



# Coventry City Council

Supporting Case for Homes in Multiple  
Occupation (HMOs)

Article 4 Direction

August 2022

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# 1. Introduction

1.1 This study provides the evidence to support the designation of an Article 4 Direction for Houses in Multiple Occupation (HMOs) in parts of Coventry and the HMO Development Plan Document (DPD). An Article 4 Direction is made under the Town & Country Planning General Permitted Development (England) Order 2015 (as amended) and removes Permitted Development Rights. Article 4 Directions do not stop development, they mean that planning consent must be sought for matters which would otherwise not need an application (i.e. 'Permitted Development'). Article 4 Directions are intended for use in exceptional circumstances and must be supported by robust evidence which demonstrates harm to local amenity and the suitable planning of the area.

1.2 HMOs are an important source of low cost, private sector housing for those on low incomes, seasonal workers, students, and those seeking temporary accommodation. HMOs tend to arise in areas with good access to public transport (in particular bus routes) and local services as well as large single family dwelling houses that can be sub-divided into much smaller and more affordable accommodation.

1.3 However, HMOs tend to concentrate in areas that provide such conditions raising concerns about their impact. HMOs and their concentration can be associated with the following issues:

- poor standards of accommodation
- loss of local character
- reduction in environmental quality
- increased noise complaints
- increased anti-social behaviour
- loss of single family dwelling houses
- increased levels of crime
- increased pressures on car parking
- dominance of private renting
- increased pressure upon local services
- changes to local retail provision

1.4 Housing tenure is changing nationally and in Coventry. Levels of home ownership have fallen whilst private renting has increased and an increasing number of people are finding it more difficult to buy their own home. The delivery of affordable housing has therefore never

been more important. Demand for housing in the city has increased for a number of reasons including:

- the increasing affordability gap as housing costs continue to rise faster than household incomes;
- the more cautious approach to mortgage lending which has resulted in lower income multiples being approved for mortgages and the need for larger deposits to secure a mortgage;
- the difficulties for individuals in getting onto the property ladder and facing more limited housing choices leading to a greater reliance on the private rented sector;
- the changes to welfare reform that make the private rented sector less accessible for those on the lowest incomes;
- the cautious approach of investors and housing developers following economic market fluctuations; and
- the increased reliance on the planning system to deliver affordable housing through S106 funding.

1.5 Within this context, there is greater pressure for more affordable HMO accommodation. The planning system has an important role to play in managing this pressure whilst protecting and enhancing the qualities that make Coventry such a distinctive place where people want to live. This study will demonstrate the effects on amenity arising from HMOs across the city and therefore will justify the designation of an Article 4 in parts of Coventry to ensure that all proposals for new HMOs in these areas are assessed through the planning system.

1.6 The Government defines a HMO<sup>1</sup> as:

*“ Your home is a house in multiple occupation (HMO) if both of the following apply:*

- *at least 3 tenants live there, forming more than 1 household*
- *you share toilet, bathroom or kitchen facilities with other tenants*

*Your home is a large HMO if both of the following apply:*

- *at least 5 tenants live there, forming more than 1 household*
- *you share toilet, bathroom or kitchen facilities with other tenants*

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<sup>1</sup> [www.gov.uk/private-renting/houses-in-multiple-occupation](http://www.gov.uk/private-renting/houses-in-multiple-occupation)

*A household is either a single person or members of the same family who live together. A family includes people who are:*

- *married or living together - including people in same-sex relationships*
- *relatives or half-relatives, for example grandparents, aunts, uncles, siblings*
- *step-parents and step-children”.*

1.7 Currently, planning permission is not needed to change the use of a house to a HMO with 3-5 residents, which is known as permitted development. The effect of any prospective article 4 direction covering HMOs will be that, within any designated article 4 area, planning permission will be required for this change of use, i.e. a small HMO (3-5 residents).

## 2. Policy Context

### Coventry Local Plan

2.1 The Coventry Local Plan was adopted in 2017 and policy H11 sets out the Council's planning policy approach to Homes in Multiple Occupation below (see fig 1).

*Figure 1: Coventry Local Plan, Policy H11*

#### **Policy H11: Homes in Multiple Occupation (HiMO's)**

The development of purpose built HiMO's or the conversion of existing homes or non-residential properties to large HiMO's will not be permitted in areas where the proposals would materially harm:

- a. the amenities of occupiers of nearby properties (including the provision of suitable parking provisions);
- b. the appearance or character of an area;
- c. local services; and
- d. The amenity value and living standards of future occupants of the property, having specific regard to internal space and garden/amenity space.

### **Coventry, Solihull and Warwickshire Strategic Housing Market Assessment (SHMA)**

2.2 The SHMA assessments have shown that the housing market in Coventry is generally focused towards smaller, lower value properties relative to the wider housing market area and national trends. For example, 71% of all Coventry homes are within Council Tax bands A and B compared to Nuneaton where the figure is 60% and the national average of 44%. Likewise, just 10% of the city's existing housing stock is classified as detached. The Council is expecting this data to be comprehensively updated through the joint 2022 Housing and Economic Development Needs Assessment (HEDNA) later in the year. However, at present, the Council is currently planning for 24,600 additional new homes between 2011 and 2031. Any new residential schemes coming forward during this period that comprise 25 homes or 1 hectare or more will be expected to provide 25% of affordable homes<sup>2</sup>.

2.3 In addition to the provision of new affordable housing, the Council was advised to investigate how better use of the existing housing stock could be made to meet housing need (recognising that the Council does not own/manage stock such investigations would need to be conducted with its stock owning, housing association partners).

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<sup>2</sup> [www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017](http://www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017)

2.4 There is also a clear role for policy to seek to encourage investment and improve standards within the Private Rented Sector (PRS). The Council already has an important planning and licencing enforcement role and should work to develop ways to improve the housing offer for households seeking private rented homes.

### **Coventry Housing Strategy**

2.5 The Coventry Housing and Homelessness Strategy was approved in 2019 covering the period up to 2024 and it identifies the following priorities:

- The Council will meet the duties placed upon it by the Homelessness Reduction Act 2017 and the Housing Act 1996 (as amended).
- Preventing Homelessness will be a corporate priority across all sections of the Council, and the Council will work in partnership with partners, providers and other stakeholders to prevent homelessness and support households that do become homeless.
- We will develop a clear partnership approach to street homelessness.
- We will adopt the Pathways model to prevent homelessness wherever possible, and support people that do become homeless. The aim of the model is to change systems where necessary in order to 'design out homelessness'
- Commit to working with the Multiple Complex Needs Board and embed the Making Every Adult Matter (MEAM) approach to removing barriers and effecting systems change and allocating resources in order to improve services to the most marginalised people affected by homelessness, including rough sleepers.
- Develop further measures to tackle rough sleeping and support vulnerable people who are (or are at risk of) rough sleeping, understanding the reasons for non-engagement and developing appropriate 'challenge and support' policies
- Include people with lived experience in future service design and improvement (Experts by Experience).
- Maximise opportunities arising from the West Midlands Combined Authority Homelessness Task Force – with the aim of designing out homelessness.
- Develop, implement and monitor a Housing First service in Coventry (under the West Midlands Combined Authority Homelessness Task Force project which has received funding from the Ministry for Housing, Communities and Local Government).
- Increase the range of housing options available for people who are homeless or at risk of homelessness - see the wider housing development themes below.

2.6 Themes 2 and 3 of the Strategy specifically address HMOs by committing to:

*'Commission research into the HMO (Houses in multiple occupation) sector, including assessing the impact of HMOs on local communities, and the effect that additional purpose-built student accommodation is having on the student housing market'.*

## **HMO and the Planning Use Classes Order**

2.7 The current Use Classes were last updated on 1 September 2020<sup>3</sup>. Uses are grouped into classes B, C, E, F and sui generis (a use like no other and not within a specified class).

2.8 HMOs fall within both Use Class C3(c) and C4. Legislation sets out when planning permission is or is not required for changes to the use of land and buildings, and the circumstances under which such changes can be undertaken. A Use Class C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger. A Use Class C4 HMO is one that is a small shared house occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

2.9 Directions are made under the Article 4 Direction of the Town & Country Planning General Permitted Development Order. They remove Permitted Development Rights. Article 4 Directions do not stop development, they mean that planning permission is required for development that would have been Permitted Development, had the Article 4 Direction not been introduced. Article 4 Directions are intended for use in exceptional circumstances where evidence suggests that development under Permitted Development rights such as the spread of HMOs harms local amenity or the proper planning of an area.

## **Coventry Household Surveys Residents' Survey 2021**

2.10 The Coventry Household Survey has been a mechanism for monitoring Coventry residents' views of quality of life in the city and has incorporated questions to better understand residents' perceptions of their health and wellbeing, cultural participation and transport choices. The survey asks questions on a number of issues including housing and the environment, the key findings revealing the following:

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<sup>3</sup> [www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](http://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)



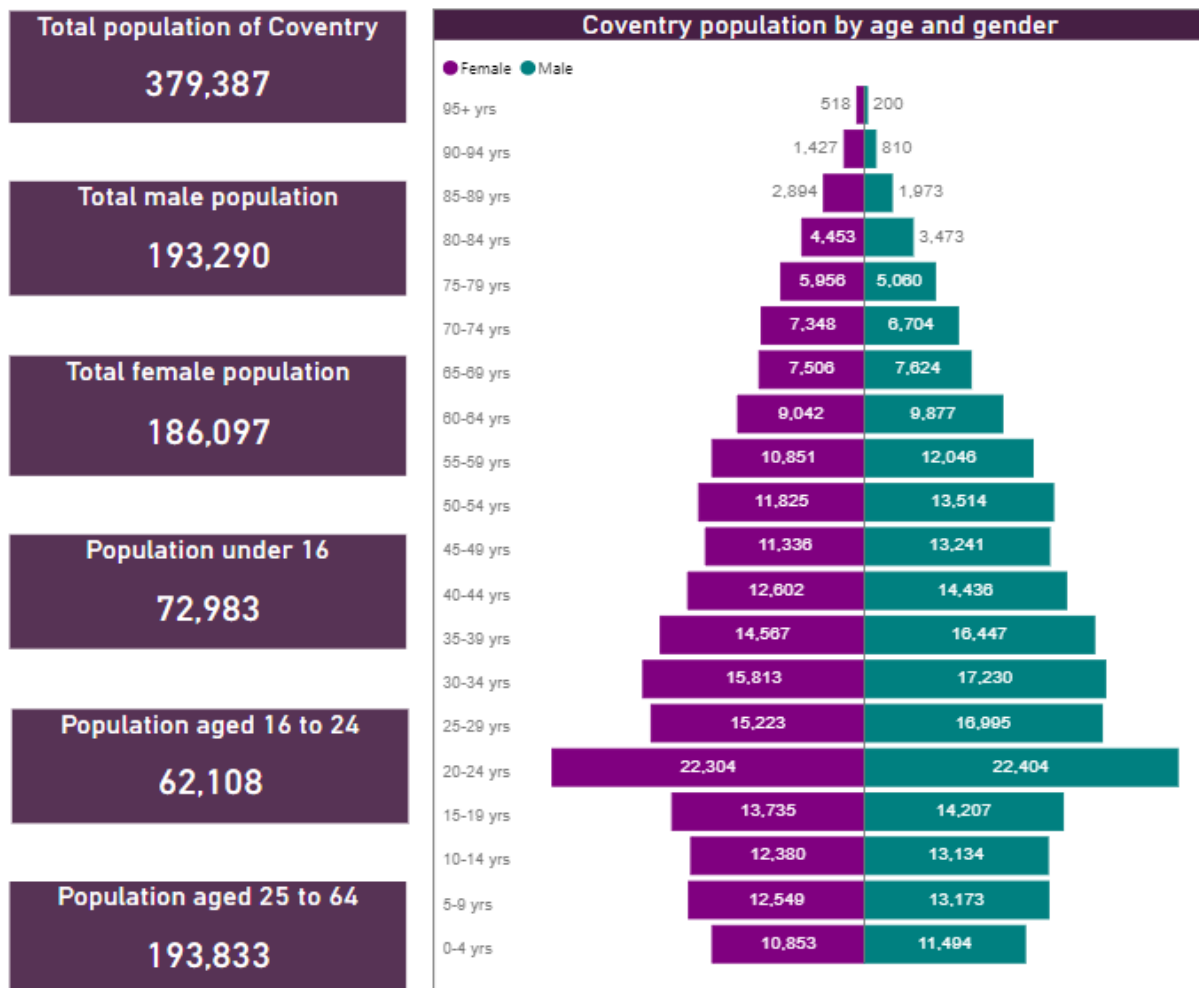
- 50% stated that it was likely they would move house in the next 4 or 5 years. The most common reasons related to moving was due to wanting a larger property or moving to a more desirable location (both 43%). This question was not included in the 2018 survey.
- Around three out of ten would like to move somewhere in their neighbourhood or elsewhere in Coventry (both 28%). The remaining 44% would like to move to somewhere outside Coventry. Popular locations included: Warwickshire (particularly Kenilworth, Leamington Spa and Nuneaton), Leicestershire, Cornwall, Devon and Wales.
- When asked what the main barriers for residents are to make their homes more energy efficient, around half (51%) stated the cost of making these improvements are too high. This question was not included in the 2018 survey.

### 3. Evidence

#### Population and Demographics

3.1 Coventry had a population of 379,387 residents in mid-2020 – see figure 2<sup>4</sup>. It is the ninth largest city in England by population. The city has seen a sustained increase in its population over the past ten years. This is due to natural change (more births than deaths) and international migration. Indeed, in recent years, Coventry’s population is thought to have grown by 1.75%, putting the city in third place of all local authority areas, after Tower Hamlets and Barking and Dagenham.

Figure 2: Coventry population by age



Source: Coventry City Council

<sup>4</sup> [www.coventry.gov.uk/facts-coventry/population-demographics](http://www.coventry.gov.uk/facts-coventry/population-demographics)

3.2 Just over one-fifth of Coventry's population, or 79,765 (21.5%) are children and young people under the age of 18 years. This is slightly higher than the national (England) rate (21.4%) but lower than the regional (West Midlands) rate (21.9%) and the metro area (West Midlands Combined Authority) rate (23.8%). It is, however, higher than the sub-regional (Coventry and Warwickshire) rate (20.8%).

3.3 Of Coventry's children and young people population, 22,757 are under-five; 28,844 are around primary school aged (ages 5-10); 20,684 are around secondary school aged (ages 11-15); and 7,480 are around sixth-form/college aged (ages 16-17). The young average age is partly because Coventry is home to two large universities – Coventry and Warwick. The City is one of the top 20 towns and cities in the UK in terms of the proportion of the population who are students.

3.4 In terms of the adult population, Coventry is home to 241,525 (65%) adults of prime working age (18-64), plus 50,231 people (13.5%) over the age of 65. This is partly because of the city's high number of students – 32% of the city's economically inactive population is explained by students (18,900 of 59,500), compared to a regional average of 28%.

3.5 The student population means there is continually a large population aged 18 – 24, this age group makes up 14.3% of the population compared to the England average of 8.8%.

There are other reasons why Coventry is a relatively young city, including:

- A number of European economic migrants, who are more likely to be younger, have moved and are moving to the city;
- In the 1970s and 1980s many young people left the city looking for work meaning that there are relatively fewer older people today than might be expected;
- Up until five years ago the annual number of births was increasing as a trend. The number of births has now stabilised and has fallen from a high of around 4,800 to around 4,600 and
- Some established middle aged residents move out of Coventry to more rural areas.

3.6 Continuing a recent trend, the average age of Coventry's residents reduced between mid-2015 and mid-2016. The population of 0-15 year olds increased by 1.9%, 16-64s increased by 2.6% and older people aged 65 and over by 0.6%. However, with life expectancy increasing the population of residents aged 65+ is likely to increase faster than younger age groups in the future. The working age population increased by the most, particularly due to growth amongst 18-24s and 25-34s partly the result of the growing universities. Coventry University

in particular has been growing and the number of full-time students enrolled there continued to increase between 2015 and 2016.

3.7 ONS reported in 2014 that overall for the UK as a whole, the proportion of the population born outside of the UK was 13% (8.3 million of 63.7 million). In Coventry the figures for 2014/15 were reported to be 24% non UK born, almost twice the national average.

3.8 According to the 2011 Census, Coventry as a local authority has experienced the greatest population migration since 2001, second only to London. The increasing diversity of populations in Coventry is creating new challenges for housing, health and social care systems, which need to adapt in order to remain responsive and ensure delivery of effective and culturally sensitive services while promoting equity, social cohesion and inclusiveness. To achieve the City's aim of reducing inequalities within the City, and in response to the City's Marmot role, addressing migrant health was a clear priority.

3.9 The 2011 Census tells us that 1 in every 5 people living in Coventry (21%) were born outside the UK. People move in and out of the city every year, including students studying at the city's two universities from both the UK (37,580) as well as an estimated 19,160 overseas students (2016-2017 figures) 14,035 students enrolled from Non-EU countries and 5,125 from EU countries. The 2011 also shows us that areas around the city centre and to the south east of the city were the most popular places for EU migrants to live, while the city centre and areas to the North East and South West are the most popular for non-EU migrants. Figures 3 and 4 provide the city wide profile.

Figure 3: Non EU migrants as a percentage of the total population

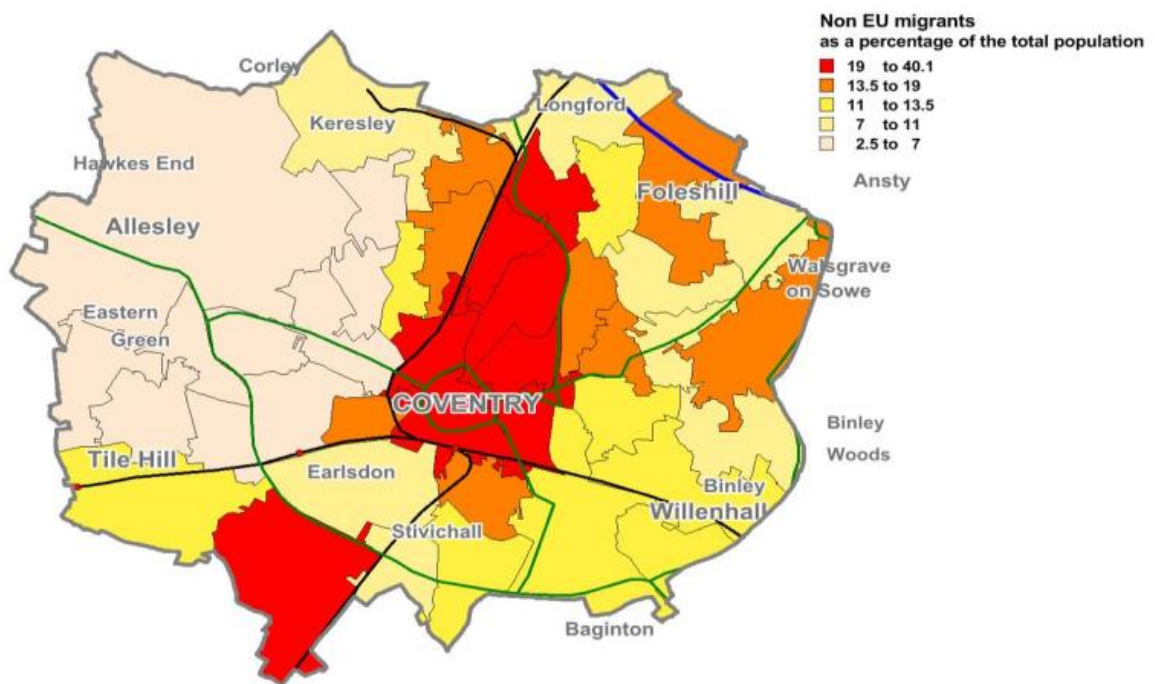
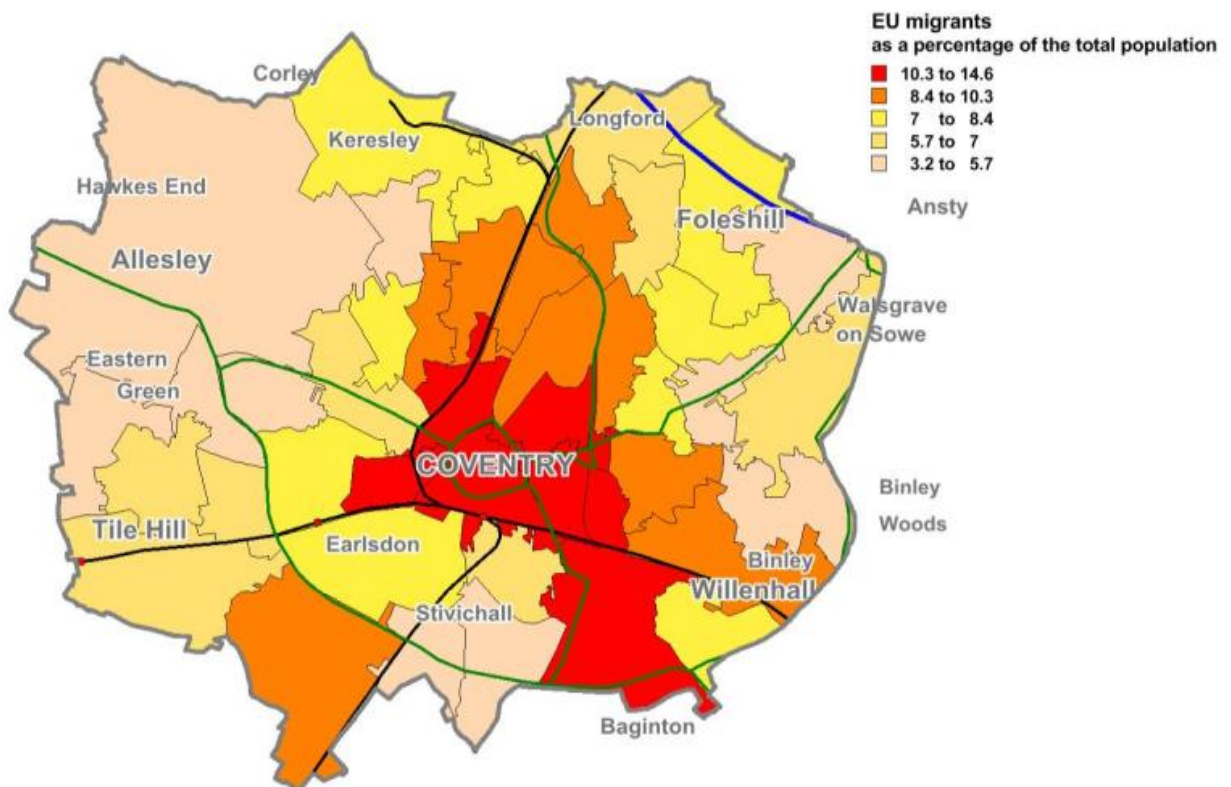


Figure 4: EU migrants as a percentage of the total population



3.10 The city has experienced high levels of migration into certain wards and as a result, has seen further demand on already stretched public services. This, has in turn, placed extra pressure on the existing housing stock and the likelihood is that a large number of migrants will seek affordable accommodation in HMOs across the city.

3.11 The composition of migrants is changing. In recent years, there has been an increase in new students coming from China and a decrease in new workers coming from Poland. In the last few years, the most common countries of origin for GP registrations for people newly resident in Coventry are, in order, China, India and Romania; but for National Insurance Number (NINo) registrations, they are, in order, Romania, India and Poland. The fact that China is significantly the highest out of GP registrations but not amongst the highest amongst NINo registrations suggests that a large number of the new arrivals from China are students. The number of people from Poland newly registering for a NINo has been on a decreasing trend recently.

3.12 Newly arrived communities do not change the city's overall health profile; however, there may be a number of specific health needs. Barriers to access should be delivered by a culturally competent health and social care workforce, one that makes use of the rich community assets in the city.

3.13 For more information and graphical representations for population and demographics, please visit: [www.coventry.gov.uk/facts-coventry/population-demographics](http://www.coventry.gov.uk/facts-coventry/population-demographics) and <https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna/4>

## Housing in Coventry

3.12 Table 1 below provides an overview of the headline housing statistics for Coventry with a comparator suite of data for the West Midlands and England.

Table 1: Housing headline statistics

Statistic	Coventry Headline Statistics		West Midlands Region	England	Period
<b>Housing</b>					
Total number of dwellings in the city (% of dwellings privately owned)	140,610	82.3%	81.1% ↔	82.7% ↔	Apr-18
Vacant dwellings (% of all dwellings)	3,569	2.5%	2.6% ↔	2.6% ↔	Oct-18
Homelessness - no of households accepted as homeless & in priority need	194				Jan 2019-Mar 2019
Average house price	£193,750	£180,000	£221,000 ↓	£280,000 ↓	Feb-22

### Reading the Tables

- ↓ indicates the Coventry rate is notably lower than the comparator
- ↑ indicates the Coventry rate is notably higher than the comparator
- ↔ indicates the Coventry rate is not notably different to the comparator
- Green indicates Coventry is doing better than the comparator
- Red indicates Coventry is doing worse than the comparator
- Black indicates that the difference is neither positive or negative

- Data updated
- Data not updated
- Data of Census 2021 required

Source: Coventry City Council

### Coventry Homefinder

3.13 Coventry Homefinder is the choice based letting system by which social housing in the city is allocated. In September 2021, a new policy was introduced and all applicants were required to re-apply, so their circumstances could be assessed against the new qualifying criteria and band system.

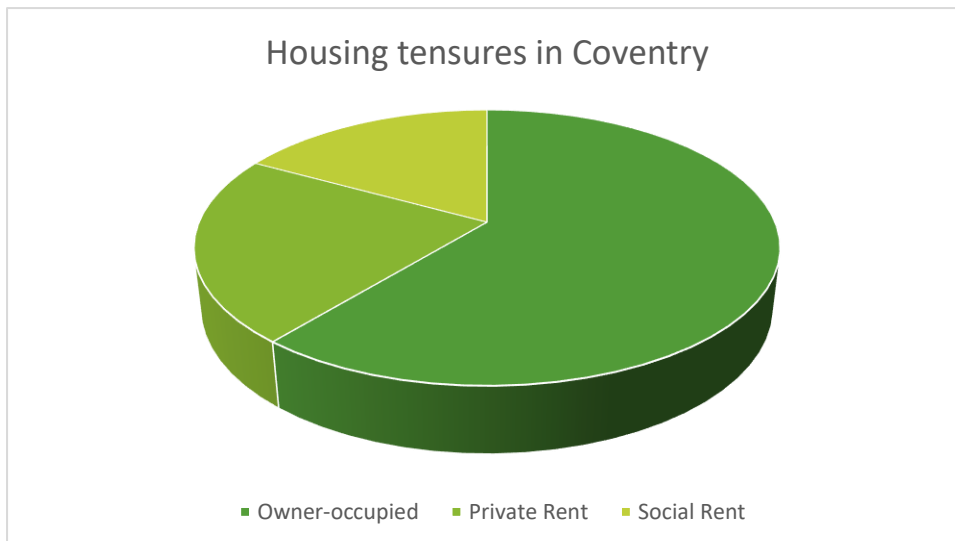
3.14 Prior to the new policy, there were approx. 13,500 households on the register, and around 3,500 of those were assessed as being in housing need under the policy (in the priority bands). The new policy means that only those with an assessed housing need can register. The current number of live applications is just under 4,400. However, the re-registration process is still ongoing so there are a number of applications waiting to be verified. As a result, it is expected the number of live applications to increase as these are processed.

3.15 During 2020/21, 1,133 properties were advertised and let through Coventry Homefinder. Almost half (47%) were studio or one-bedroom properties suitable for single people or couples, 37% had two bedrooms, and 15% had three bedrooms. Only 16 properties were advertised that had four or more bedrooms. There were, on average, 232 bids placed per property advertised.

### Housing tenures

3.16 The proportion of properties in Coventry that are in the private rental market has increased. The 2011 census showed that 20% of properties were privately rented, up from 11% in 2001. The Office for National Statistics (ONS) estimates that in 2020, 22% of properties in Coventry were privately rented – see figure 5.

Figure 5: Housing tenure



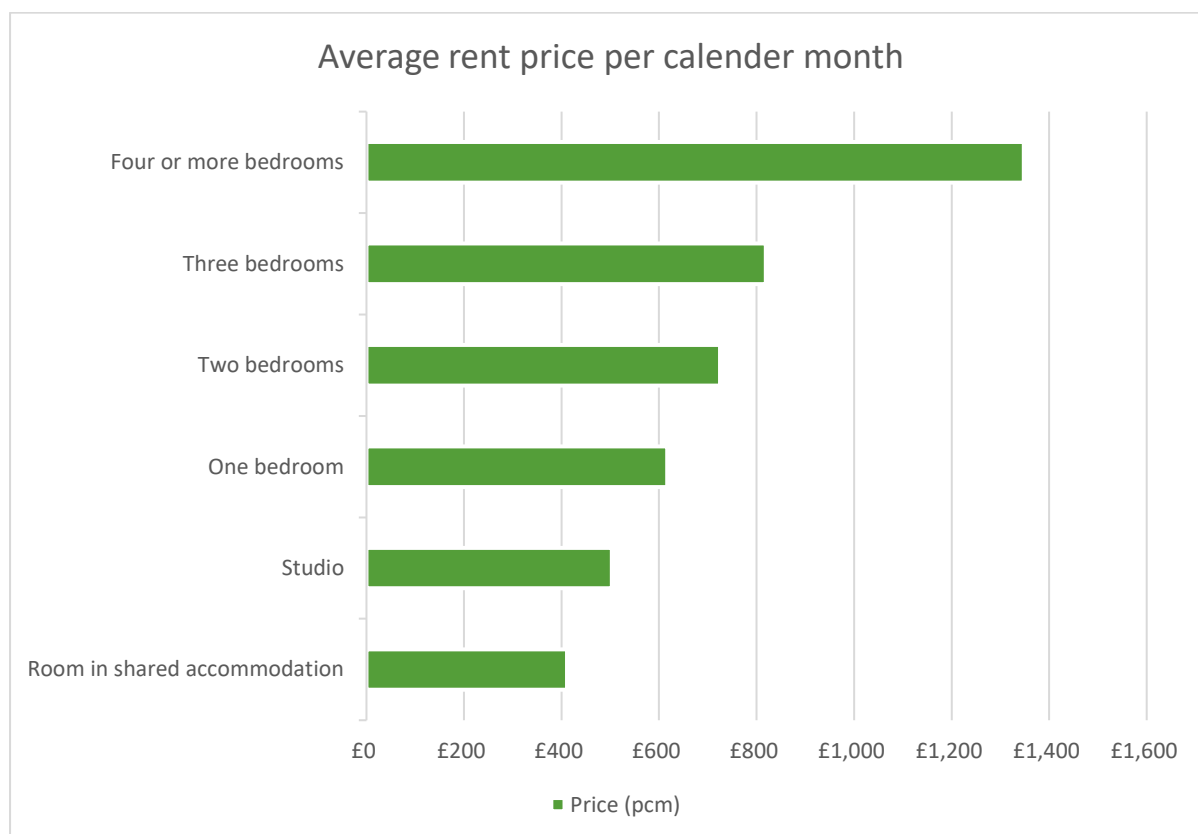
Source: Coventry City Council, Housing Strategy

### Housing Affordability - Private Rented Sector

3.17 Affordability of home ownership remains challenging. The average rent for a private rented property in Coventry is now £724 per month (September 2021). This has increased from £657 per month in Sept 2019.



Figure 6: Average rents for different sized properties, Sept 2021



Source: Coventry City Council, Housing Strategy

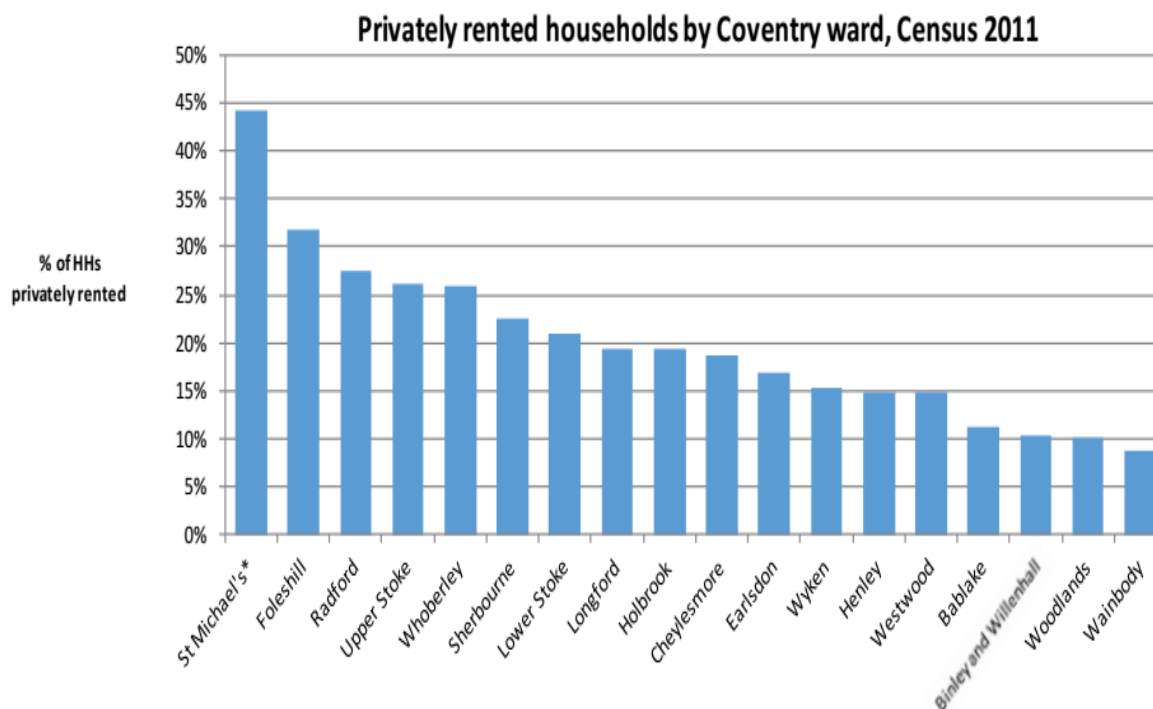
3.18 The Local Housing Allowance determines the most that an eligible household can claim for housing costs in the private rented sector through housing benefits or the housing element of Universal Credit. The current LHA rates for Coventry are:

- Shared accommodation: £77.50pw (equivalent to approx. £336pcm)
- 1 bedroom accommodation: £112.77pw (approx. £489pcm)
- 2 bedroom accommodation: £132.33pw (approx. £573pcm)
- 3 bedroom accommodation: £155.34pw (approx. £673pcm)
- 4 bedroom accommodation: £201.37pw (approx. £873pcm)

### Ward specific housing data

3.19 The 2011 Census indicates that St Michael's (44%) has over double the national average of households (17%) living in private rented accommodation. St. Michael's has the highest proportion of households living in the private rented sector in the city, with 44% compared with the next highest, Foleshill with 32%. Figure 7 below shows the overall level of private rented households across the city by ward. It is interesting to note that of those wards with the highest concentrations of HMOs, they also feature in the highest number of households in the private rented sector, notably, St.Michaels, Upper Stoke, Whoberley, Sherbourne and Lower Stoke.

Figure 7: private rented sector



Source: Census, 2011

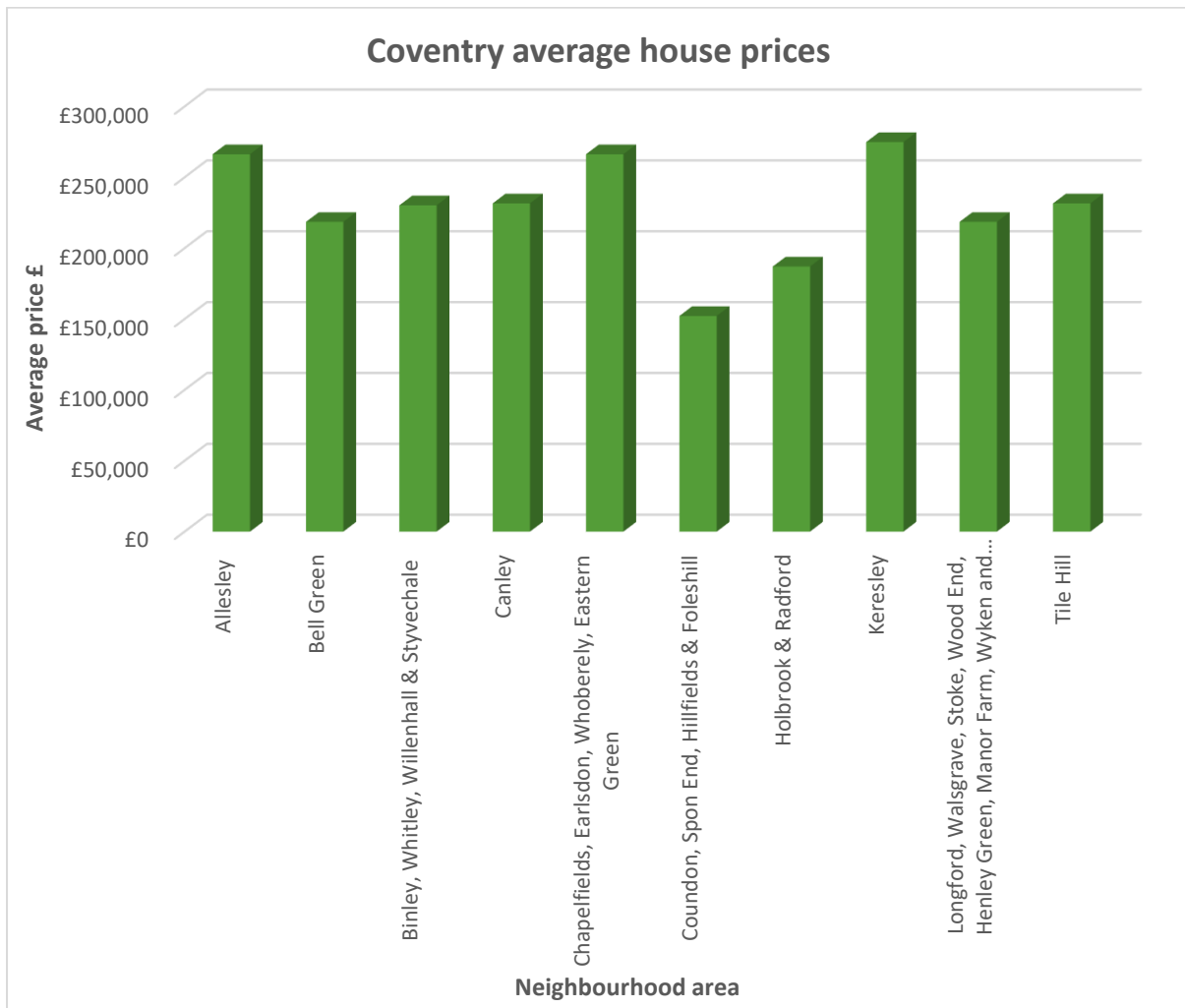
### Housing Affordability – Home ownership

3.20 The lower quartile property price for Coventry is £155,000 and the average property price is £219,500 (June 2021). Affordability of home ownership has continued to worsen, with the ratio of lower quartile house price to lower quartile earnings rising from 6.06 in 2015 to 7.11 in 2020. Semi-detached houses sold for an average of £247,130, terraced houses sold for an average for £184,136 and flats sold for an average of £126,919. Overall, house prices in the region went up by 7.3% since 2020<sup>5</sup>. Figure 8 below shows the average price of properties across the neighbourhoods of Coventry.

3.21 There remains a housing shortage in Coventry with an estimated 14,000 households on the waiting list for housing there is a particular need for larger 3 and 4 bedroom properties. Affordability is also a major concern issue. As can be seen from Figure 4 the average house price for property has increased considerably over the past 10 years in all property types.

<sup>5</sup> <https://www.coventrytelegraph.net/news/coventry-news/average-house-price-coventry-warwickshire-22777131>

Figure 8: average house price in Coventry



Source: [www.coventrytelegraph.net/news/coventry-news/average-house-price-coventry-warwickshire-22777131](http://www.coventrytelegraph.net/news/coventry-news/average-house-price-coventry-warwickshire-22777131)

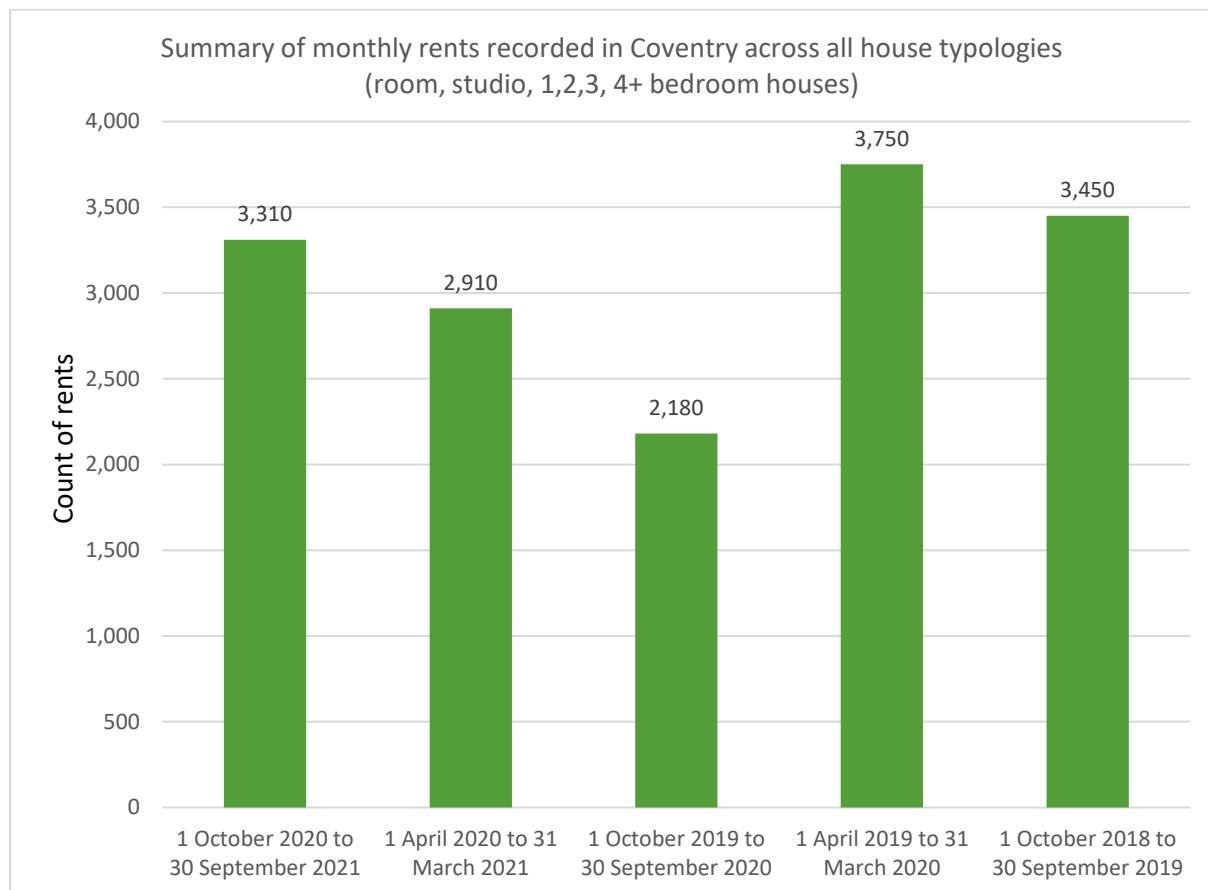
3.22 The growth and increase in the size of the Private Rented Sector (PRS) has been a significant change in the housing market in Coventry. The Office of National Statistics (ONS) reported in 2015 that there were estimated to be 34,326 households in the PRS in Coventry. HMOs are a major concern for the Council with the Census 2011 suggesting that HMOs currently make up a quarter of the PRS. The trend over many years has been for the HMO stock to grow steadily within the City.

3.23 The Council has produced a Housing Strategy which recognises that, amongst other things, there is limited social affordable housing available in the City making it clear that the private rented sector will need to play a greater role in meeting housing needs in the City. Landlord licensing is part of a wider set of measures to enable landlords to provide good quality housing within their communities and Additional Licensing of HMOs will help alleviate

the housing situation in HMOs by setting and maintaining minimum standards across the city in the most vulnerable sector of Coventry's private rental market.

3.24 Additional Licensing has required all private landlords with HMOs in designated areas of the city to apply for a licence for each property before they can be let to tenants. In order to become a licence holder a landlord has to meet certain standards. Figure 9 below represents the median monthly rental prices for the private rental market in Coventry for all bedroom categories calculated using data from the Valuation Office Agency and Office for National Statistics<sup>6</sup>.

Figure 9: summary of monthly rents recorded in Coventry across all house typologies (room, studio, 1,2,3, 4+ bedroom houses)



Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>

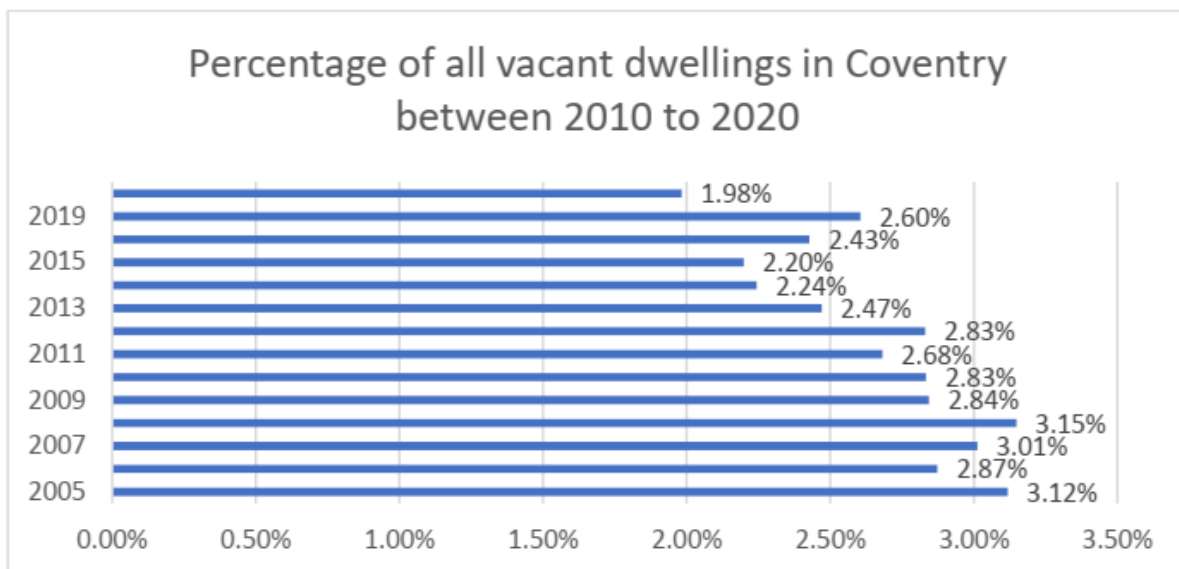
<sup>6</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>

## Vacant Homes<sup>7</sup>

Since 2010, the number of vacant dwellings in Coventry was steadily decreasing to levels of around 3,189 properties in 2016. In 2017 however, the numbers began to increase to the point where in 2019 there were 3,830 vacant dwellings. These levels exceed those seen for a number of years in the city.

As can be seen from figure 10 below the percentage of vacant dwellings has decreased steadily since 2005, only rising again in 2018/19 and then dropping back off again in 2020 to 2%. This would suggest that the average number of vacant dwellings is below both the national average and the slightly higher average for the West Midlands. The levels are also significantly better than those for previous years in Coventry.

Figure 10: percentage of all vacant dwellings in Coventry 2010-2020

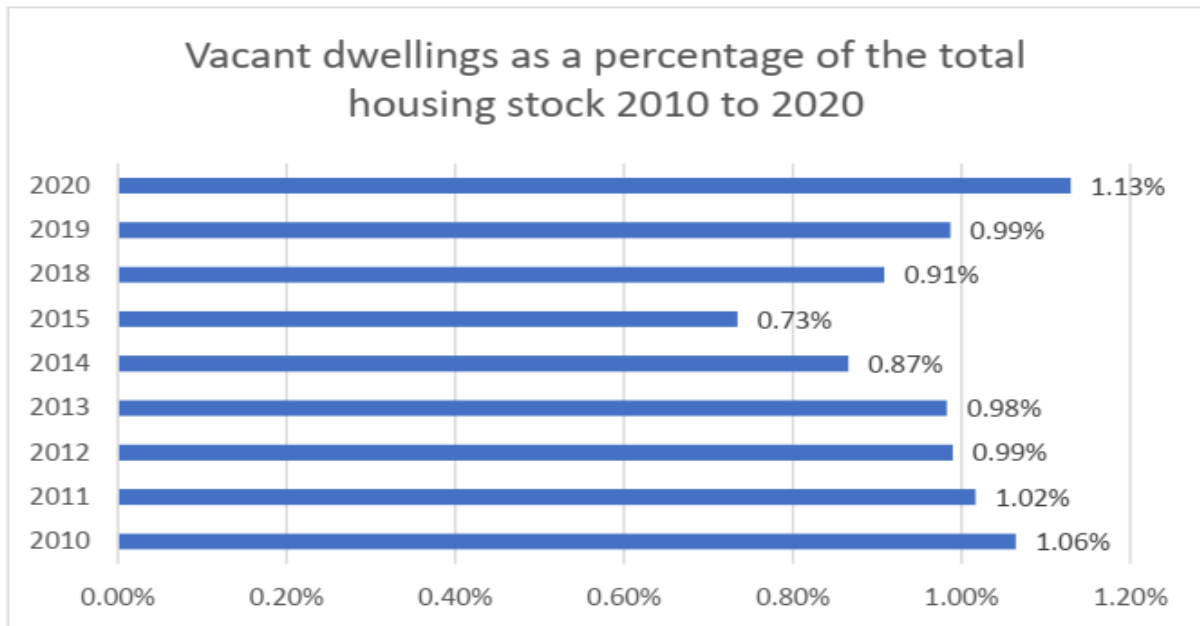


The figures for long-term vacant dwellings as a percentage of the total housing stock in Coventry and the total number of vacant dwellings it can be evidenced that the picture is somewhat different. The average vacant dwellings as a percentage of the total number of dwellings in Coventry at 1.3% is above the national and regional average of 0.9%.

Figure 11 below provides the percentages of all vacant dwelling in Coventry in each year between 2010 and 2020 as a percentage of the total housing stock. This shows that, in the case of long-term vacant dwellings, although there was a decline in percentages between 2010 and 2015 over the last five years there has been a considerable increase to record levels now in 2020.

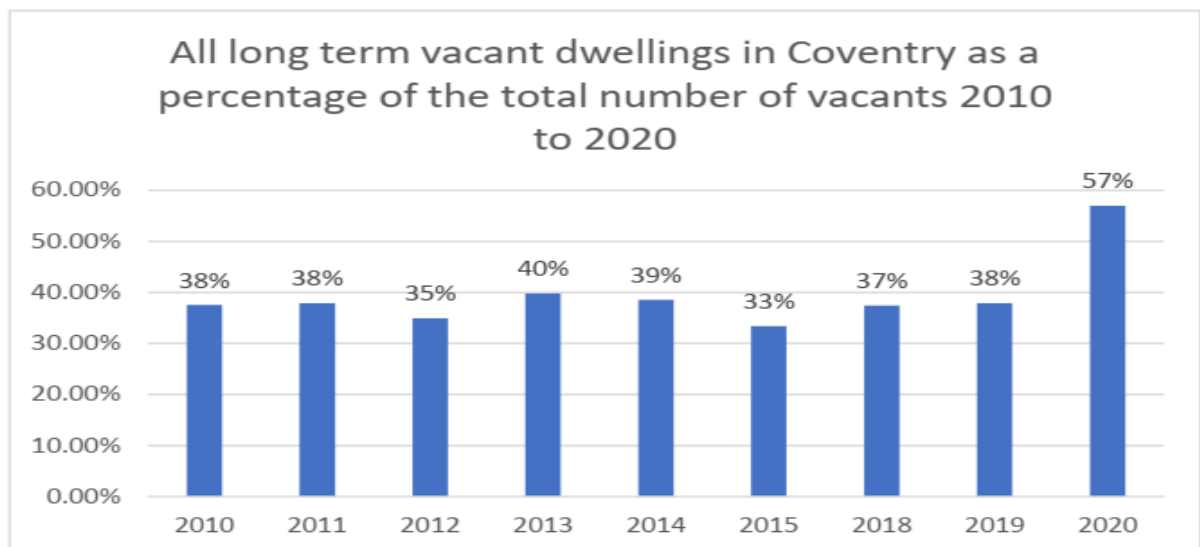
<sup>7</sup> Coventry City Council

Figure 11: all vacant dwellings in Coventry as a percentage of the total housing stock 2010 to 2020



Furthermore, when we consider the number of long-term vacant dwellings as a percentage of the total number of vacant dwellings this also increases significantly for 2020. As can be seen from Figure 12 below the current percentage of long term vacant dwellings as a proportion of the total number of vacant dwellings is now estimated to be 57% which means that approximately 1,661 or over half of all vacant dwellings have been empty for 6+ months or more.

Figure 12: all long-term vacant dwellings in Coventry as a percentage of the total number of vacant dwellings 2010 to 2020



## Diversity

Coventry is an ethnically diverse city, with around one-third (33%) of the population from minority ethnic groups compared to 20% for England as a whole. The largest minority ethnic group are Asian/Asian British communities, making up 16.3% of the city's population; including 8.8% with an Indian background.

The next largest minority group are people with a White Other background, who make up 4.9% of the population. Coventry's population with a Black African background has grown to 4%, which is now more than double the English average (1.8%). The largest numbers of new communities are from Polish, Nigerian, Somali, Cameroonian, Chinese and Roma communities.

The city's population is expected to become more diverse: among schoolchildren, 48.7% of pupils are from ethnic backgrounds other than White British, including 9.3% Black African, 8.9% Asian Indian and 7.5% White Other – see figure 13. In addition, 50 first languages are spoken in Coventry schools by 50 or more children. The most common first languages spoken are English (67.1%), followed by Panjabi (3.9%); Polish (3.9%); Urdu (3.1%); Romanian (1.7%); and Bengali (1.6%). The city is expected to become even more diverse, with nearly half of Coventry pupils from BME backgrounds. According to the latest school census, 52% of Coventry's school children are from a BME background, up from 38% in 2011. The biggest population growth in school children is seen in Black African, Asian Other and White Other groups.

Figure 13: Coventry's school population



For more information and graphical representations for diversity, please visit:

[www.coventry.gov.uk/facts-coventry/population-demographics/3](http://www.coventry.gov.uk/facts-coventry/population-demographics/3) and

<https://www.coventry.gov.uk/facts-coventry/joint-strategic-needs-assessment-jsna/4>

## Deprivation

Coventry's relative deprivation, as measured by the English indices of multiple deprivation (IMD) 2019 has generally improved compared to the previous release in 2015. According to the extent measure, which measures the proportion of the local authority district's population living in the most deprived lower-layer super output areas (LSOA) in the country, Coventry is ranked 81<sup>st</sup> out of 317 local authorities (with 1 being the most deprived), compared to 59<sup>th</sup> in 2015.

The English Index of Multiple Deprivation (IMD) is a quantitative measure of multiple deprivations, experienced by people living in an area in English local councils, commissioned by the Department for Communities and Local Government. It is recognised as one of the best indicators of deprivation. It scores all neighbourhoods in England according to the 'multiple deprivation' experienced by their residents using 37 separate indicators of deprivation combined, including measures of:

- Income
- Employment
- health deprivation and disability
- education, skills and training
- barriers to housing and services
- crime
- living environment.

The information for each neighbourhood is then scored and ranked relative to others in England. St. Michael's ranks within the top four most deprived wards within Coventry and in the 7% most deprived wards in England (Table 2).

In total, 28 of the city's 195 LSOAs are among the country's 10% most deprived, that is, 14.4% of LSOAs compared to 10% across England overall (fewer neighbourhoods compared to 18.5% of LSOAs in 2015). Over one-third (37%) of Coventry children live in low-income families (after housing costs) in 2017/18, according to figures from the Child Poverty Action Group published May 2019. This however masks significant differences between wards, for instance, 58% of children in Foleshill live in low-income families (after housing costs) compared to 18% in Wainbody.



Table 2: Index of Multiple Deprivation – Coventry wards, 2015

Coventry wards	IMD: Overall (2015) - score	Rank across all England wards (1 = most deprived, 7,529 = least deprived)	Rank within Coventry
Foleshill	49.8	169	1
Binley & Willenhall	41.2	410	2
Longford	39.1	505	3
St Michael's	39.0	517	4
Henley	38.8	531	5
Radford	35.0	788	6
Upper Stoke	30.1	1,230	7
Holbrook	28.3	1,425	8
Lower Stoke	26.9	1,583	9
Westwood	26.0	1,697	10
Sherbourne	20.5	2,626	11
Wyken	20.3	2,656	12
Cheylesmore	19.6	2,789	13
Woodlands	19.4	2,845	14
Whoberley	18.1	3,125	15
Bablake	16.8	3,447	16
Earlsdon	9.3	5,988	17
Wainbody	9.2	6,036	18

Source: LGInform; Local Government Association

Coventry's life expectancy at birth is 82.4 years for females and 78.3 years for males. Life expectancy in Coventry is lower than the national average, but it is at the level expected given the city's level of deprivation.

However, there remains a wide inequality gap, for example, a man from the most deprived area can expect to die 11.1 years younger than one from the least deprived area; and for a woman, the difference is 9.5 years. Premature mortality (deaths under the age of 75) is higher in Coventry because of higher rates of premature mortality from cardiovascular disease, cancer and respiratory disease. Compared to other places, the premature mortality rate amongst Coventry men due to cardiovascular disease is particularly high.

For more information and graphical representations for deprivation, please visit: [www.coventry.gov.uk/factsaboutcoventry](http://www.coventry.gov.uk/factsaboutcoventry)

## Planning Enforcement

The maps below (figures 14, 15 and 16) show the geographic distribution of enforcement complaints the Council's planning department has received in relation to HMO properties over the past three years (2019 to 2021). The complaints are clustered in their highest numbers primarily in the St. Michaels, Whoberley, Sherbourne, Westwood and Lower Stoke wards with Holbrooks, Foleshill and Wainbody wards also experiencing significant complaints.

Below are a small number of examples of enforcement complaints received and managed by the Council's planning department. These illustrate the concerns that local residents have when properties convert to HMOs and that in many cases the lack of planning powers the Council has to manage these effectively where no planning application is initially required (for small HMO).

### **Friars Road, St. Michaels**

Planning application approved in 2015 for single story rear extension to both dwellings (30 & 32) under same ownership, however no application submitted for HMO, letter sent to landlord requesting application is submitted.

### **Ribble Road, Lower Stoke**

Complainant raised issue about the conversion to a HMO and that this would cause unacceptable noise. Inspection confirmed this was a five room HMO and planning permission is not required.

### **Walsgrave Road, Lower Stoke**

Complainant raised issues for the change of use to HMO including trespass, unauthorised removal of neighbours fence and unguarded excavations.

### **Mowbray Street, St. Michaels**

Complainant raised issue about the conversion to a HMO but investigations found it was a five person HMO and no planning application was required due to it being classed as permitted development.

### **Holbrook Lane, Holbrooks**

Complainant raised issue about the conversion to a HMO and that this would cause unacceptable amenity issues. Inspection confirmed this was a five room HMO and planning permission is not required.

Figure 14: HMO enforcement complaints 2019-2021

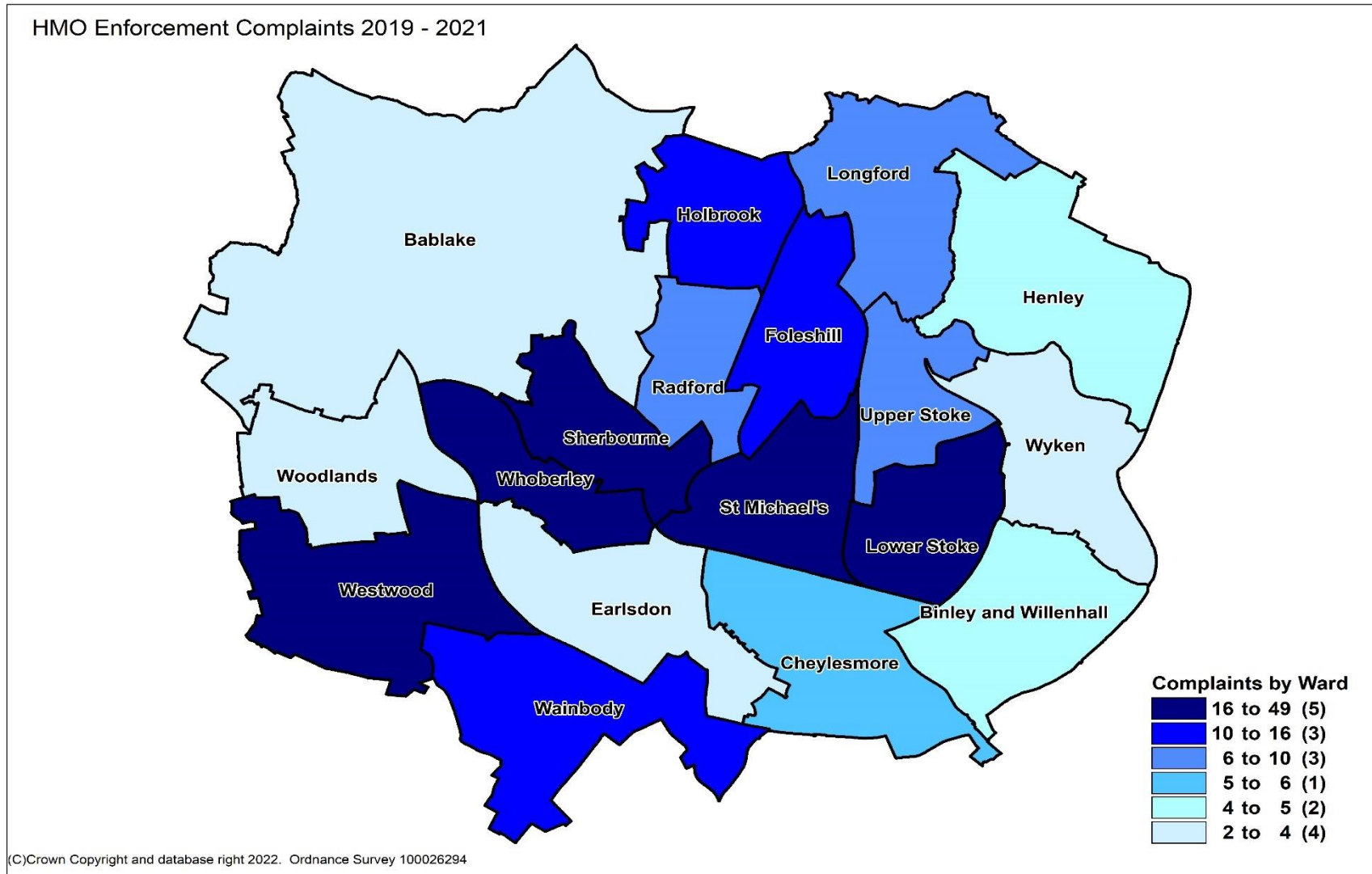


Figure 15: HMO enforcement complaints heat map 2019-2021

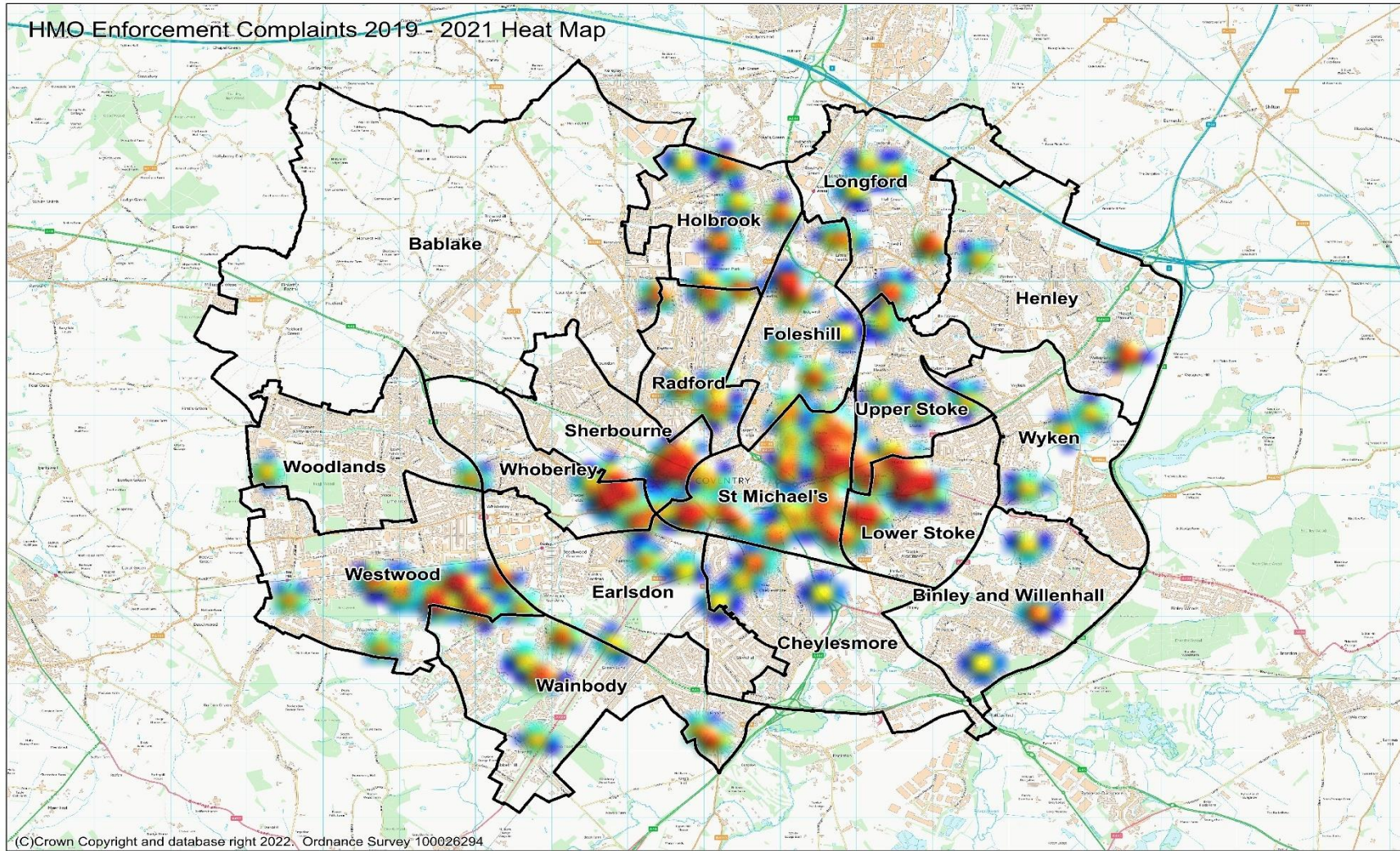
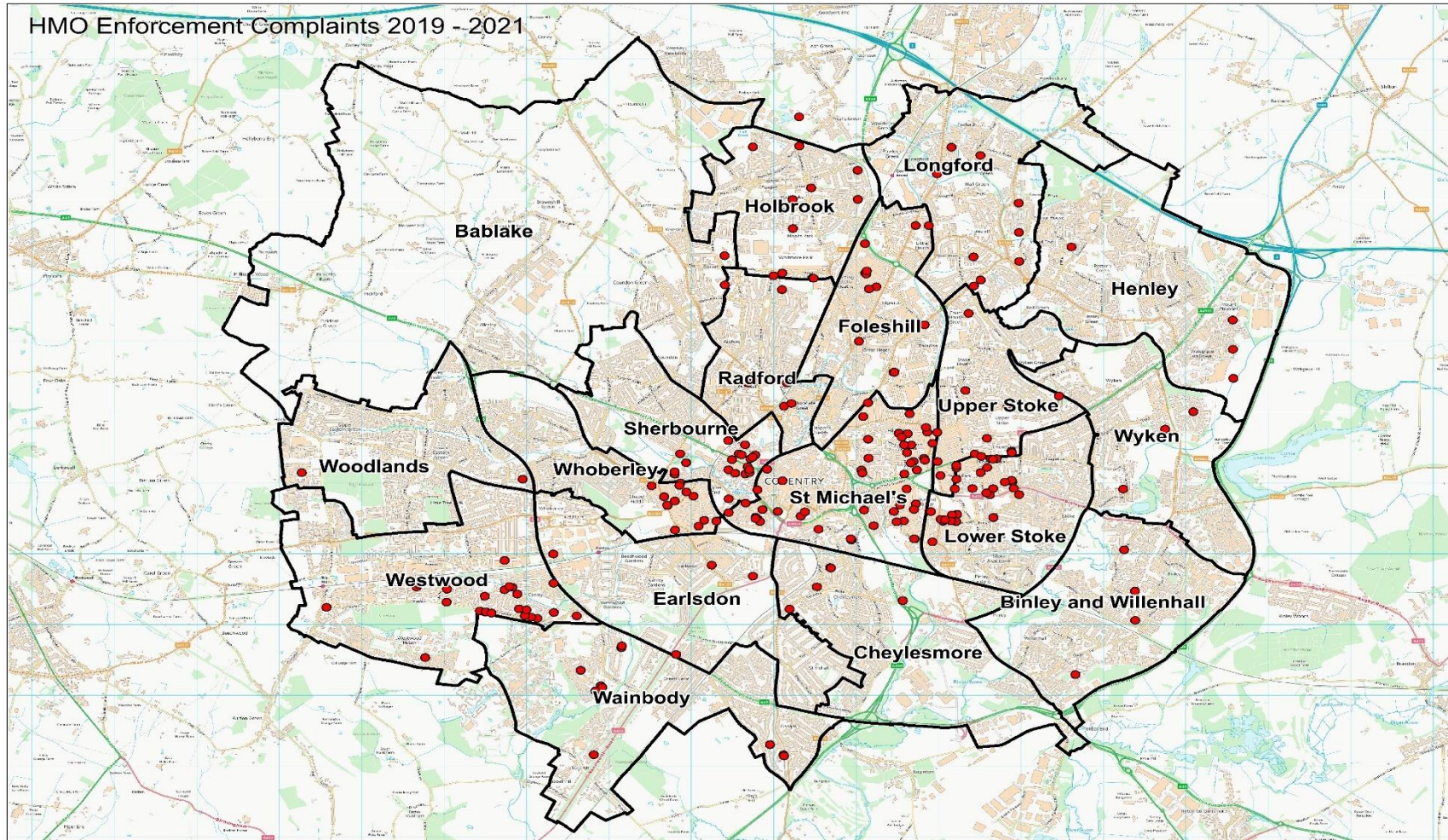


Figure 16: Concentration of HMO enforcement complaints 2019-2021



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## Crime

The overall crime rate in Coventry in 2021 was 40 crimes per 1,000 people. This compares favourably to the West Midlands's overall crime rate, coming in 13% lower than the West Midlands rate of 45 per 1,000 residents<sup>8</sup>.

In October 2021, Coventry had the worst crime rate in the West Midlands for bicycle theft, with 4 crimes reported and a crime rate of 0.01 per 1,000 inhabitants. October 2021 was also a bad month for Coventry residents, when it was the West Midlands's highest rates for burglary, recording 4 crimes at a rate of 0.01 per 1,000 residents. Coventry recorded 9 reports of criminal damage and arson during December 2021, making its crime rate of 0.02 the worst for criminal damage and arson in the West Midlands that month.

The most common crimes in Coventry are violence and sexual offences, with 7,305 offences during 2021, giving a crime rate of 19. This is 82% lower than 2020's figure of 13,263 offences and a difference of 15.59 from 2020's crime rate of 35. Coventry's least common crime is theft from the person, with 109 offences recorded in 2021, a decrease of 104% from 2020's figure of 222 crimes.

Figures 17 and 18 show the levels of recorded anti-social behaviour and all crime rates per 1,000 residents respectively. The data shows that St. Michaels, Henley, Lower Stoke, Foleshill, Wyken, Sherbourne and Willenhall have the highest instances of recorded crime in. The darker colour shows the areas in which the highest number of crimes are recorded. These areas are generally the same areas which have higher density homes, greater levels of deprivation and more unemployment. Figures 17 and 18 also show that the geographic spread of anti-social behaviour has a similar pattern to crime in general.

This is supported by the data in table 3 which shows Willenhall has the highest rates of recorded crime in Coventry, followed by Central Coventry in second place, and Foleshill East as the third highest area. Coventry's lowest rate neighbourhoods are, in order, Allesley Green & Lower Eastern Green, Allesley Park, and Binley.

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<sup>8</sup> <https://crimerate.co.uk/west-midlands/coventry>

Table 3 – Crime rates in Coventry’s neighbourhoods

<b>Neighbourhood</b>	<b>Crime Count</b>	<b>Crime Rate</b>	<b>Danger Rank</b>
Allesley Green & Lower Eastern Green	115	20	37th
Allesley Park	111	19	38th
Ash Green & Keresley End	513	60	Fourth
Barras Heath	208	30	27th
Bell Green	464	55	Ninth
Binley	204	22	36th
Canley & Westwood Heath	375	43	13th
Cannon Park & University	257	26	31st
Central Coventry	1,238	71	Second
Chapelfields	225	31	25th
Cheylesmore Daventry Road	248	27	28th
Clifford Park	449	57	Sixth
Copsewood	367	34	24th
Coundon	142	23	34th
Earl Place & Lime Tree Park	171	26	30th
Eastern Green & Tanyard Farm	227	26	32nd
Finham Park	141	24	33rd
Foleshill East	759	62	Third
Foleshill West	445	57	Seventh
Hillfields	884	56	Eighth
Holbrooks	391	41	14th
Little Heath	349	48	11th
Longford	389	48	12th
Lower Stoke & Gosford Park	527	41	15th
Naul's Mill & Bishopsgate Green	677	58	Fifth
Radford East	296	35	20th
Radford West	271	38	19th
Ravensdale	339	41	16th
Sherbourne	331	34	23rd
Stivichall & Finham	238	27	29th
Stoke Heath	455	49	Tenth
Tile Hill	354	40	17th
Walsgrave & Woodway Park	289	34	21st
Whitley & Tollbar End	417	39	18th
Whitmore Park	211	34	22nd
Whoberley	184	23	35th
Willenhall	570	76	First
Wyken Croft	181	30	26th

Crime and anti-social behaviour can have an impact in causing low demand in areas. This may force property owners to look at alternative means at letting properties, such as subdividing into smaller accommodation. This can perpetuate the issues that already exist in these areas and further create issues of low demand.

For more information and graphical representations on crime statistics, please visit:

<https://crimerate.co.uk/west-midlands/coventry>



Figure 17: Levels of recorded ASB in Coventry

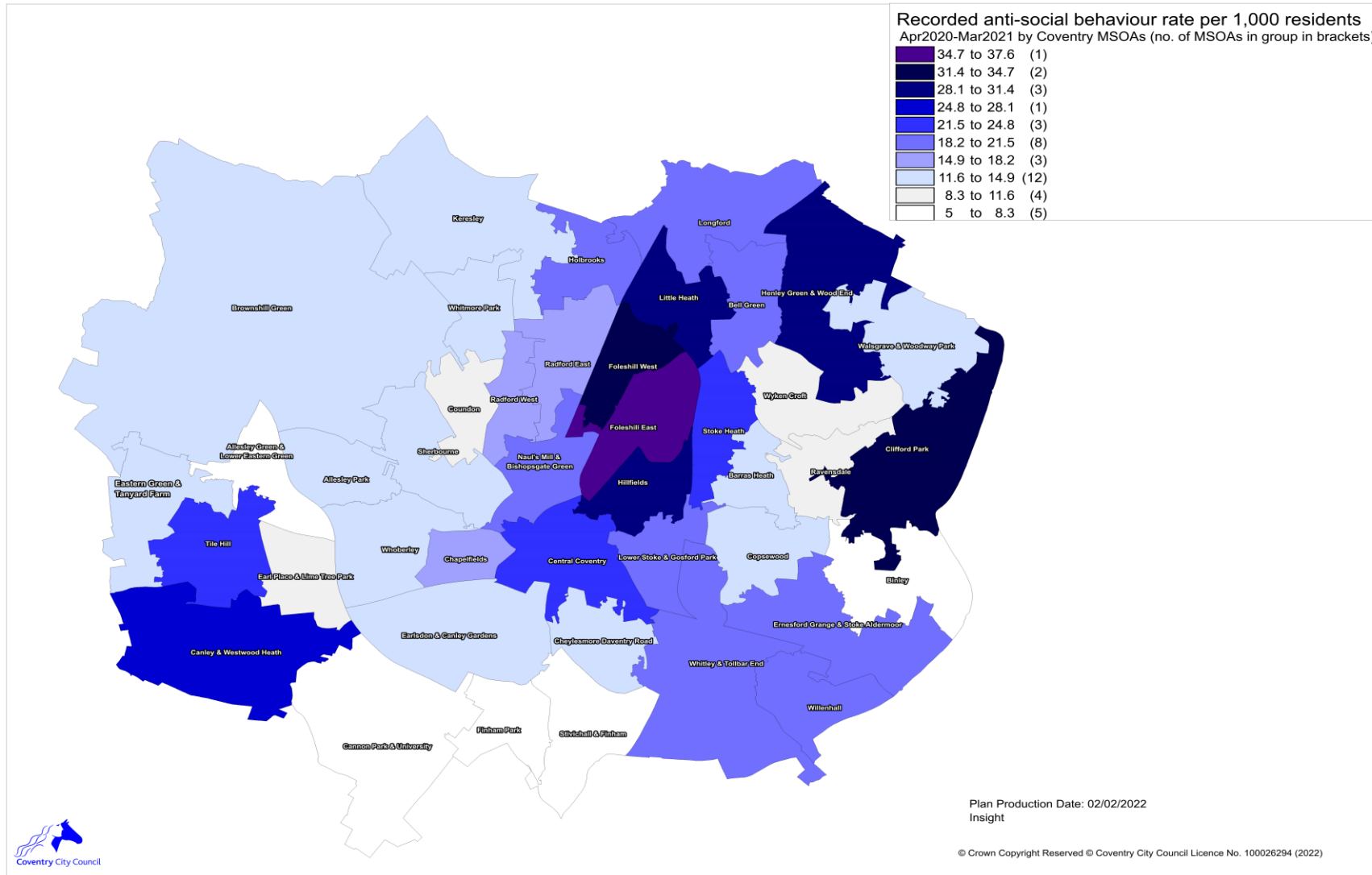
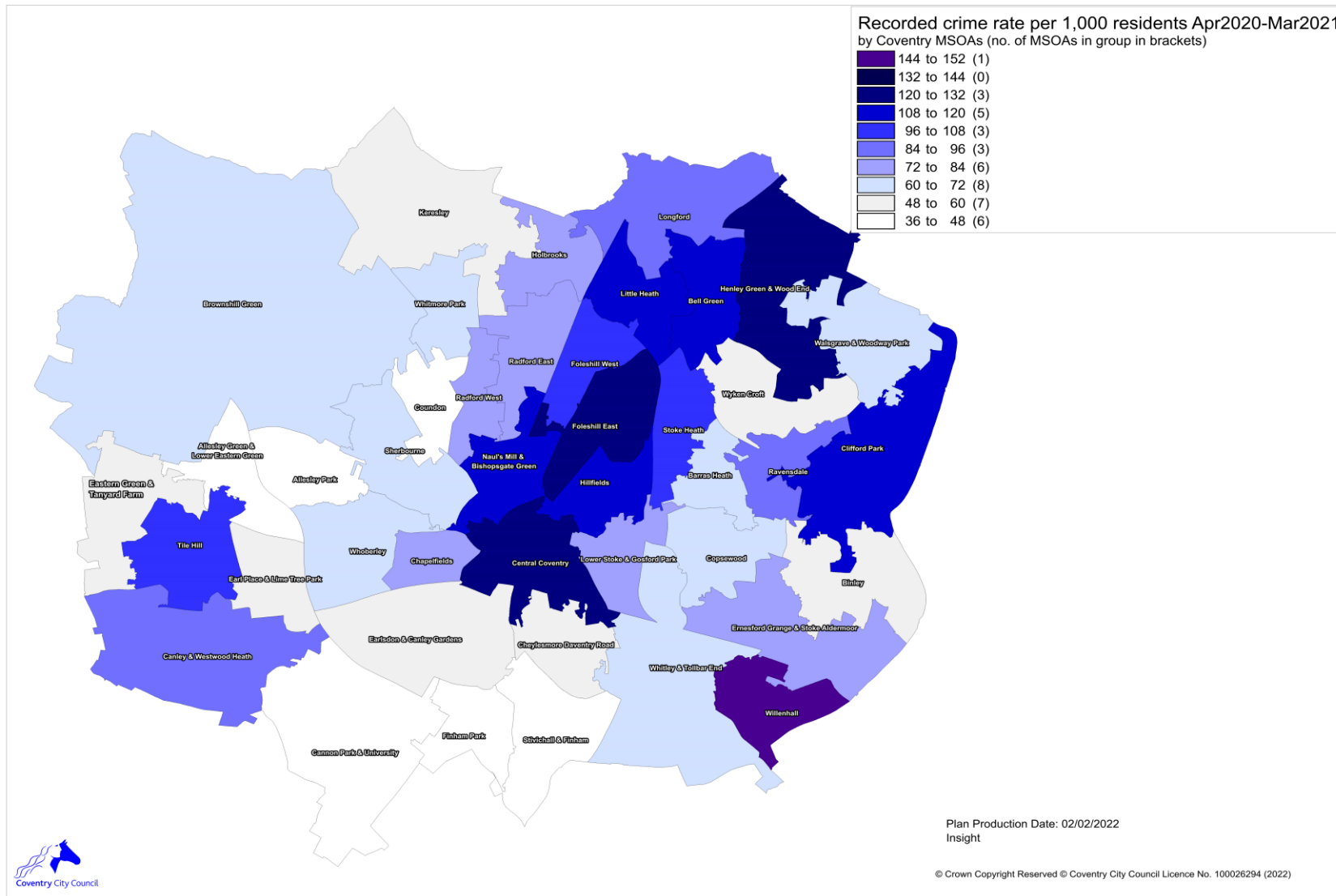


Figure 18: Levels of overall recorded crime in Coventry



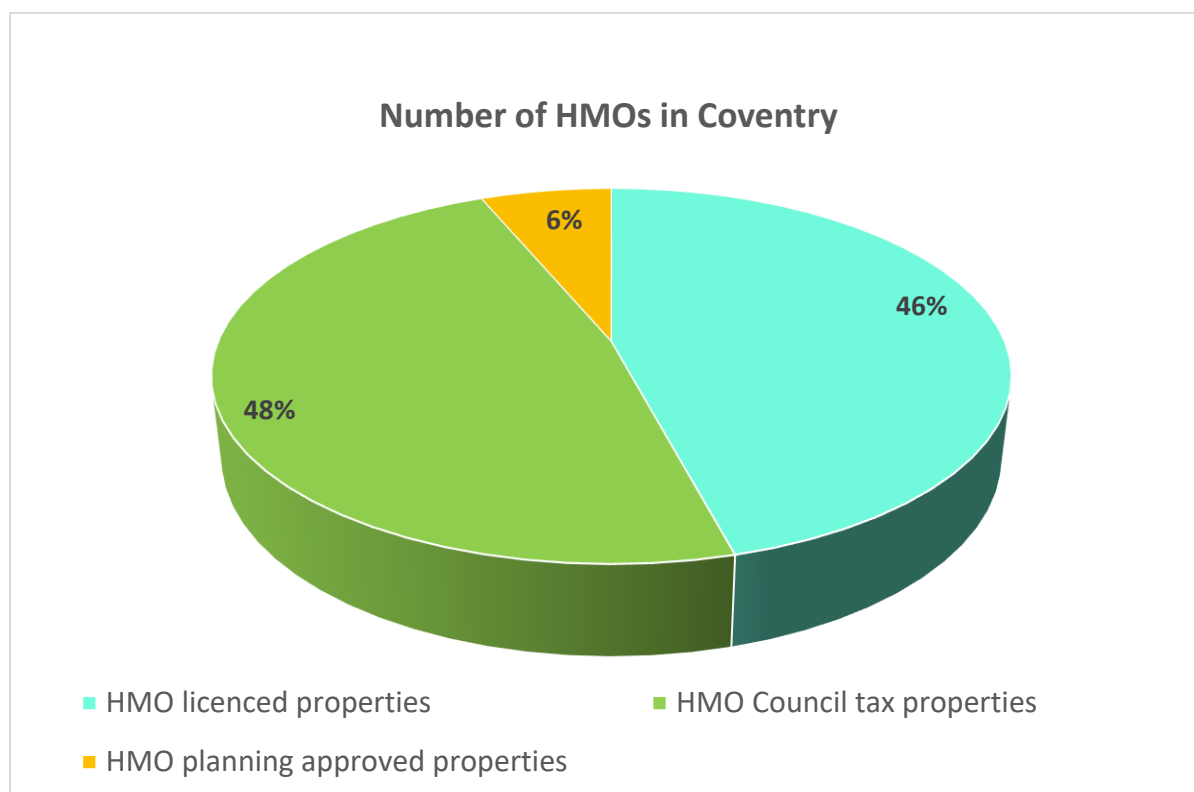
## City wide mapping of HMOs

For the purposes of the proposed Article 4 Direction covering HMOs, a city-wide assessment of the numbers and distribution of existing HMOs was undertaken in February 2022 using the following data sources:

- Council tax records – properties with student exemptions (excluding purpose built student accommodation and self-contained flats)
- Licensing records – properties licensed as an HMO
- Planning records – properties with C4 or Sui Generis planning consent or issued with a Certificate of Lawful Development

As of February 2022, there are a total of 4,066 individual HMOs identified across the city. Of these, 1,864 were identified from the HMO licensing data, 257 from previous planning approvals including C4 HMOs and 1,945 have been identified from council tax records. These have been recorded and added to the mapped data, see figure 19.

Figure19: Total number of HMOs in Coventry



Source: Coventry City Council

Figure 20 shows the city-wide distribution of HMO properties across the city that have been identified through the mapping exercise, categorised by the data sources described above. It

is intended that this mapped data will become a 'live' dataset which is kept continually up to date. The maps only show a snapshot of the HMOs identified as of February 2022. The accompanying inset maps in figures 20, 21, 22, 23 and 24 focus on those areas of the city that experience the highest concentrations of existing HMOs.

### **HMOs in Coventry**

Based upon the data and evidence within this report together with the findings from the 2022 HMOs in Coventry report, it is clear that the properties, in many cases, are giving rise to one or more particular challenges either for those occupying the HMOs or for members of the public. It is estimated that Coventry is one of the top ten authorities having the highest number of HMOs in England and Wales with 4,066 HMOs as of February 2022 which is equivalent to approximately 24% of the total PRS stock.

Overall, HMOs have been identified in almost every part of the city with particular concentrations in several wards including Westwood, Wainbody, Whoberley, St.Michaels, Lower and Upper Stoke, Sherbourne and Radford. Only the north west of the city (Bablake) has a relatively sparse distribution of HMOs. The maps below focus in on the areas of the city where greater concentrations of HMOs have been identified.

### **Site visits and meetings**

As part of the research for this evidence document, officers undertook visits in areas of the city where the mapping exercise showed higher proportions of HMOs. This has helped to confirm the impacts that have been identified by complainants and include the following observations (see photographic evidence below):

- High concentrations of vehicles parked in front of properties and on-street;
- Removal of front gardens and walls to accommodate vehicular parking;
- Some HMOs were poorly maintained resulting in a degradation of the quality of the local environment and raising questions about the quality of the living environment for the inhabitants;
- Higher numbers of refuse bins cluttering streets and pavements;
- Property frontages cluttered with 'rooms to let' signs, multiple satellite dishes, electricity and gas meters, doorbells and occasionally multiple front doors;
- Streets where it appears the same landlord/ company has converted a number of properties to HMOs in close proximity to one another.

Photographic evidence of the above can be found below. Such impacts appeared to be magnified where an area also contained large concentrations of self-contained flats and other types of communal accommodation. Issues with HMOs are often raised at Council planning committee meetings and have been the subject to the Homes and Neighbourhoods Overview and Scrutiny three times in the last 18 months. In addition, local residents' groups and associations have engaged with planning officers through meetings regarding their concerns about HMOs for a number of years suggesting the issues evidenced above are continuing to be of significant concern.

Figure 20: Concentration existing HMOs – licenced applications, licenced and council tax properties, February 2022

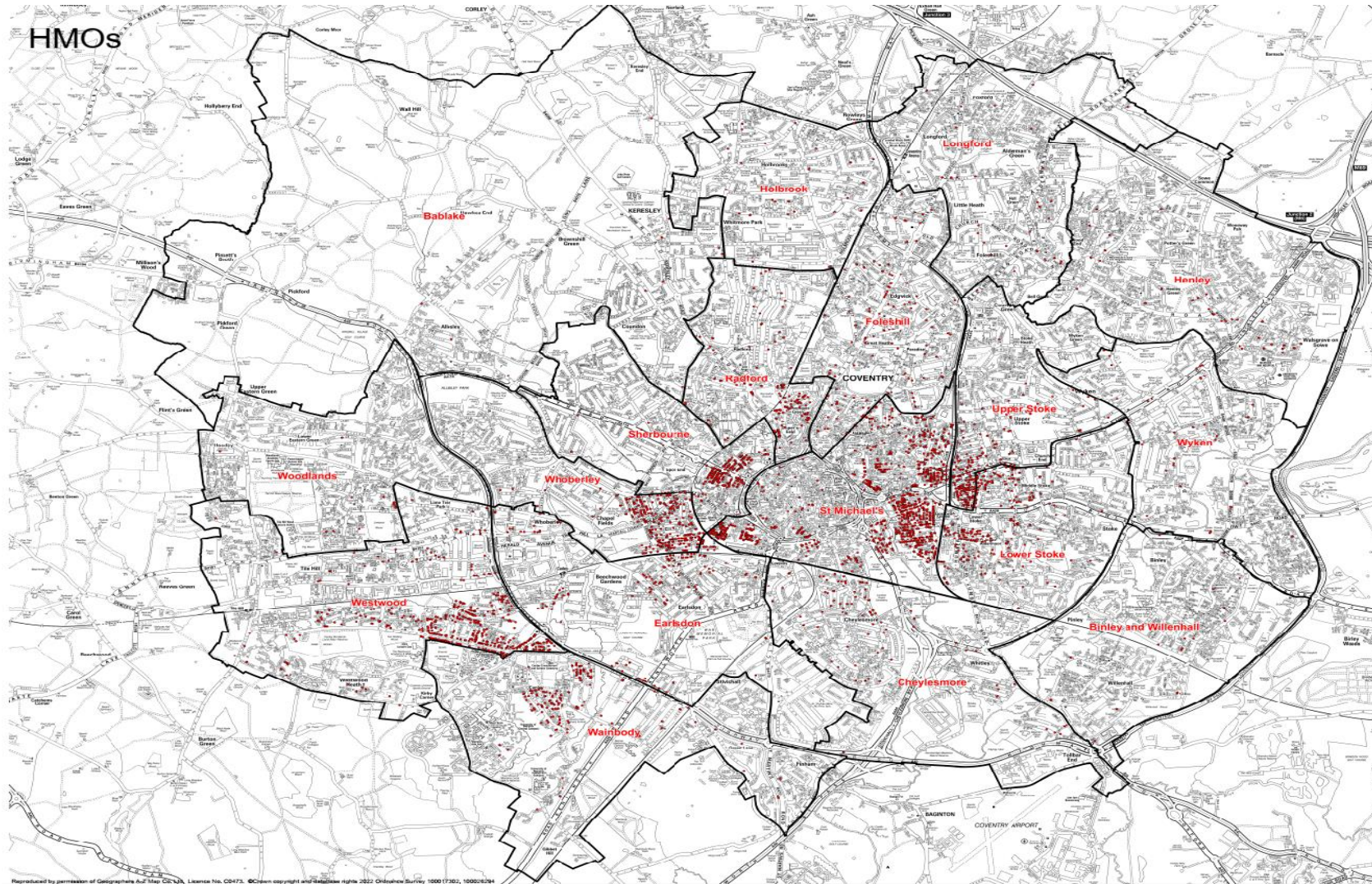
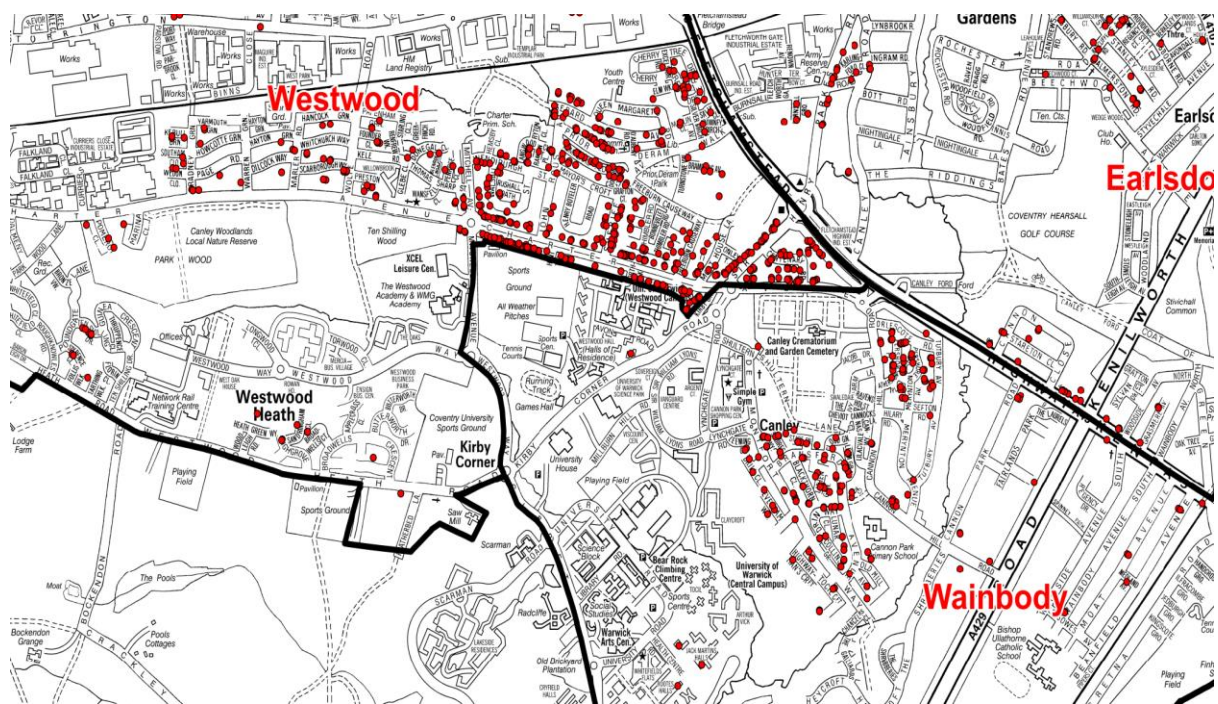


Figure 21: HMO concentrations: Westwood and Wainbody



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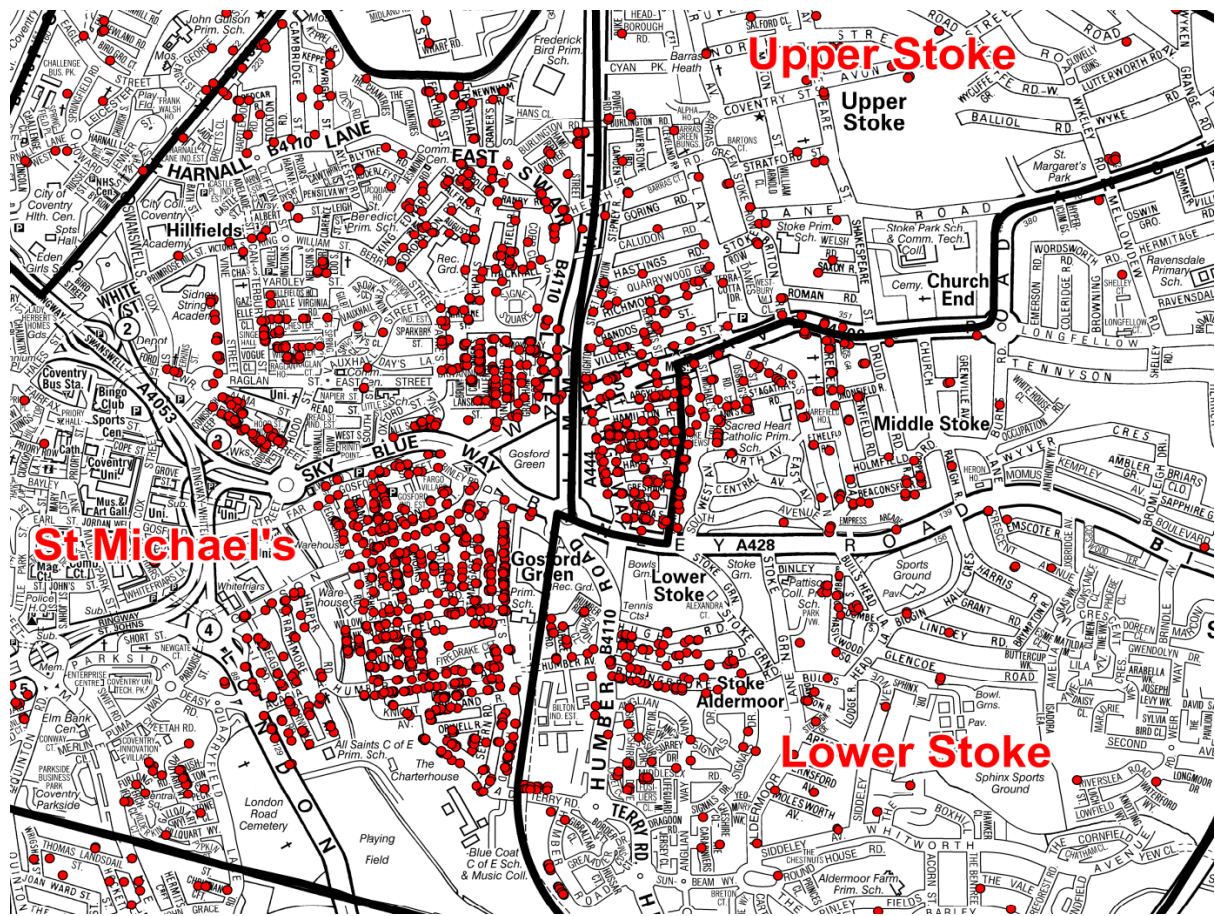
A typical street scene of existing HMO properties in Westwood ward







Figure 22: HMO concentrations: St. Michaels and Upper and Lower Stoke



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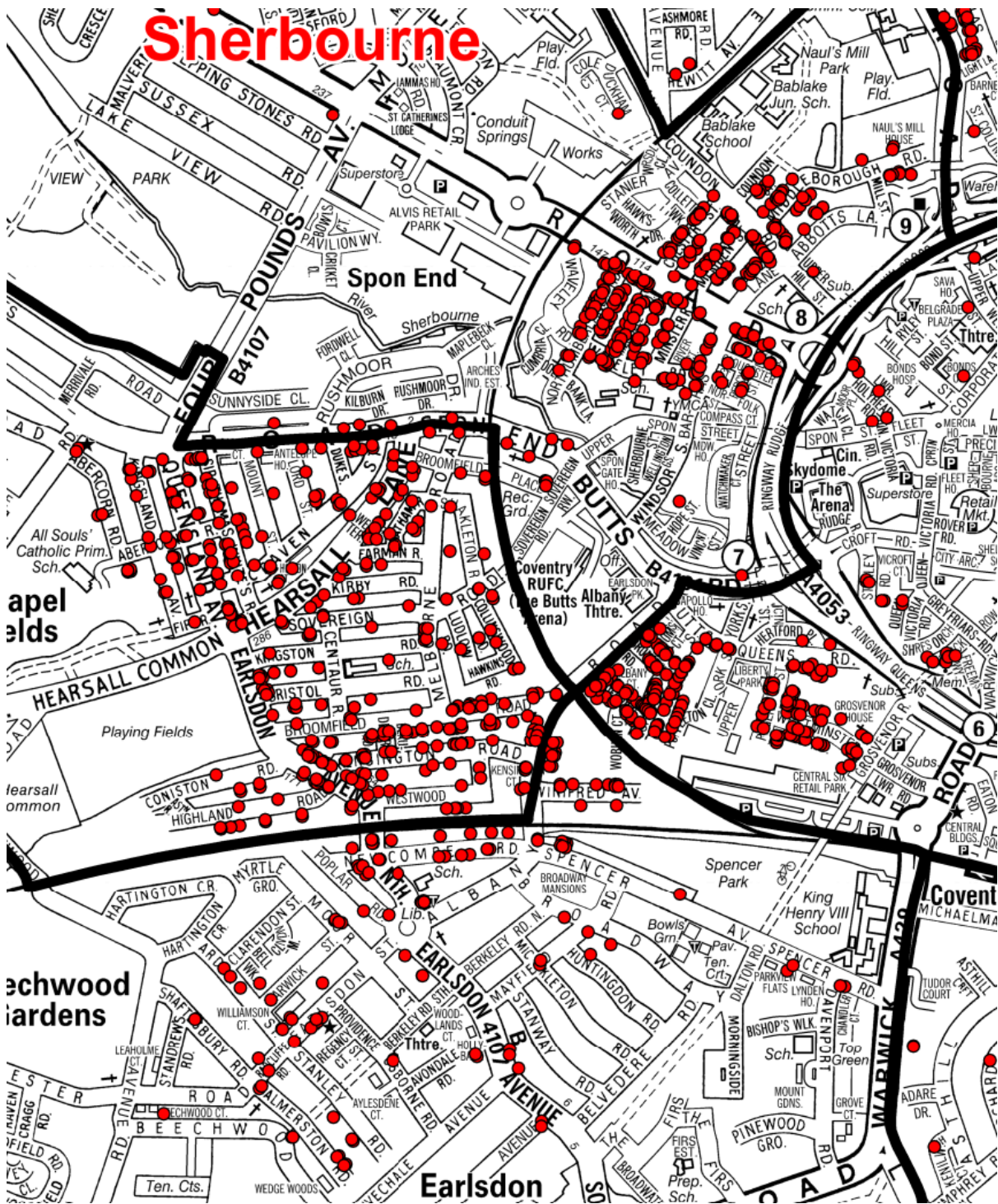
A typical street scene of existing HMO properties in St. Michael's ward





Amenity issues associated with a concentration of HMO properties, St. Michael's ward.

Figure 23: HMO concentrations: Sherbourne



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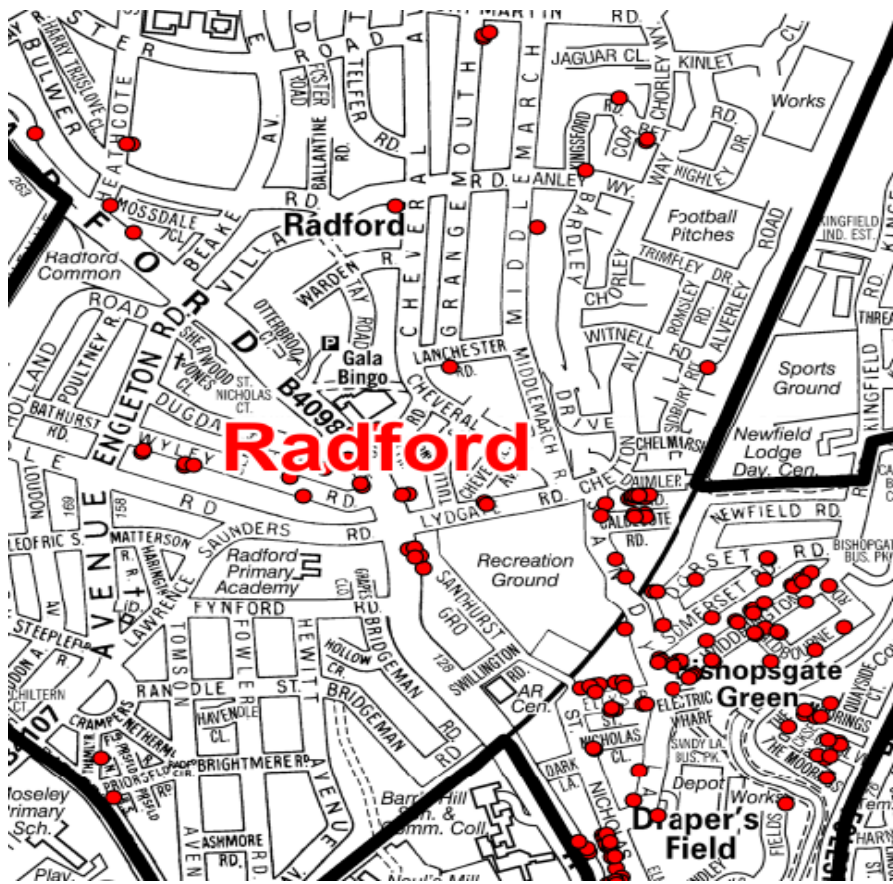
A typical street scene of existing HMO properties in Whoberley and Sherbourne wards





Amenity issues associated with a typical suite of Coventry HMO properties, Sherbourne.

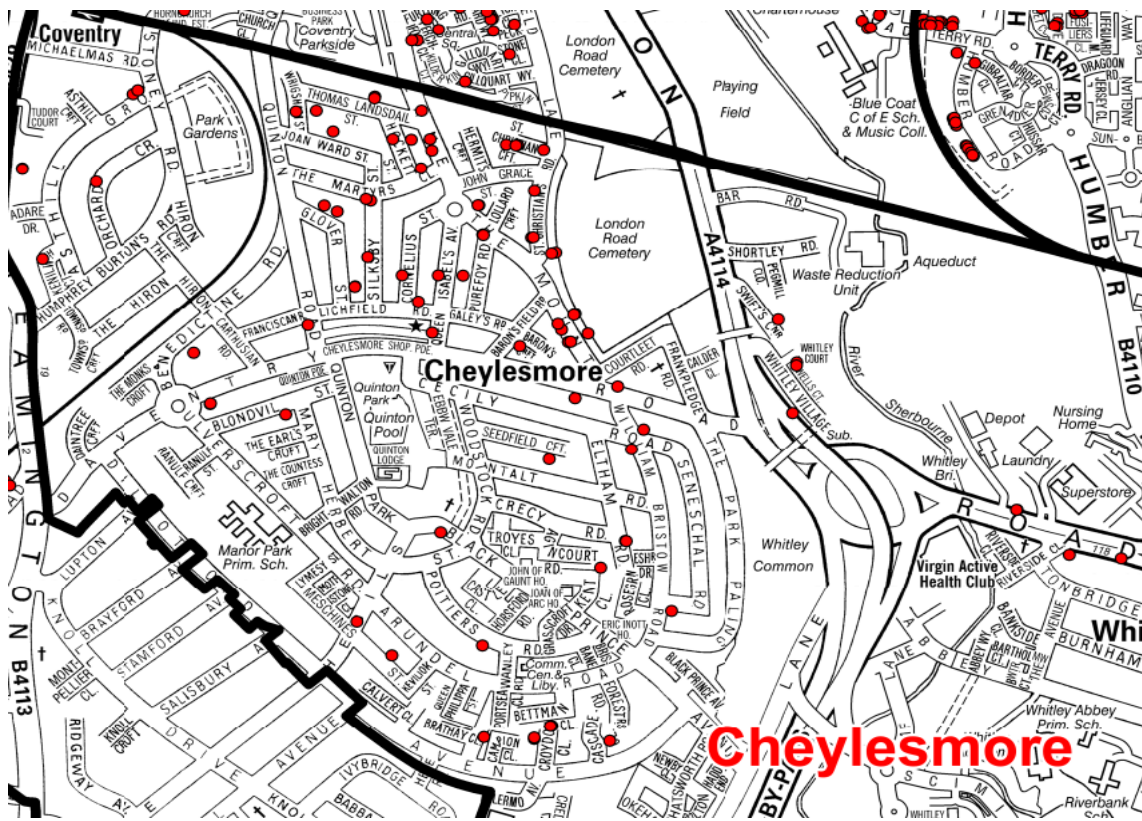
Figure 24: HMO concentrations: Radford



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Figure 24: HMO concentrations: Cheylesmore



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## Amenity Issues in Coventry

Fly tipping, noise, anti-social behaviour, dog fouling, unsightly gardens, land and property and vermin issues can have an impact in causing low demand in existing residential areas. This may force property owners to look at alternative means at letting properties, such as subdividing into smaller accommodation. This can perpetuate the issues that already exist in these areas and further create issues of low demand and with higher numbers of HMOs, this can lead to increased levels of waste thus causing the potential to attract higher numbers of vermin (rats). Figures 25, 26, 27, 28, and 29 show the city-wide geographic distribution of such amenity issues described above.

Figure 25: Fly tipping incidents

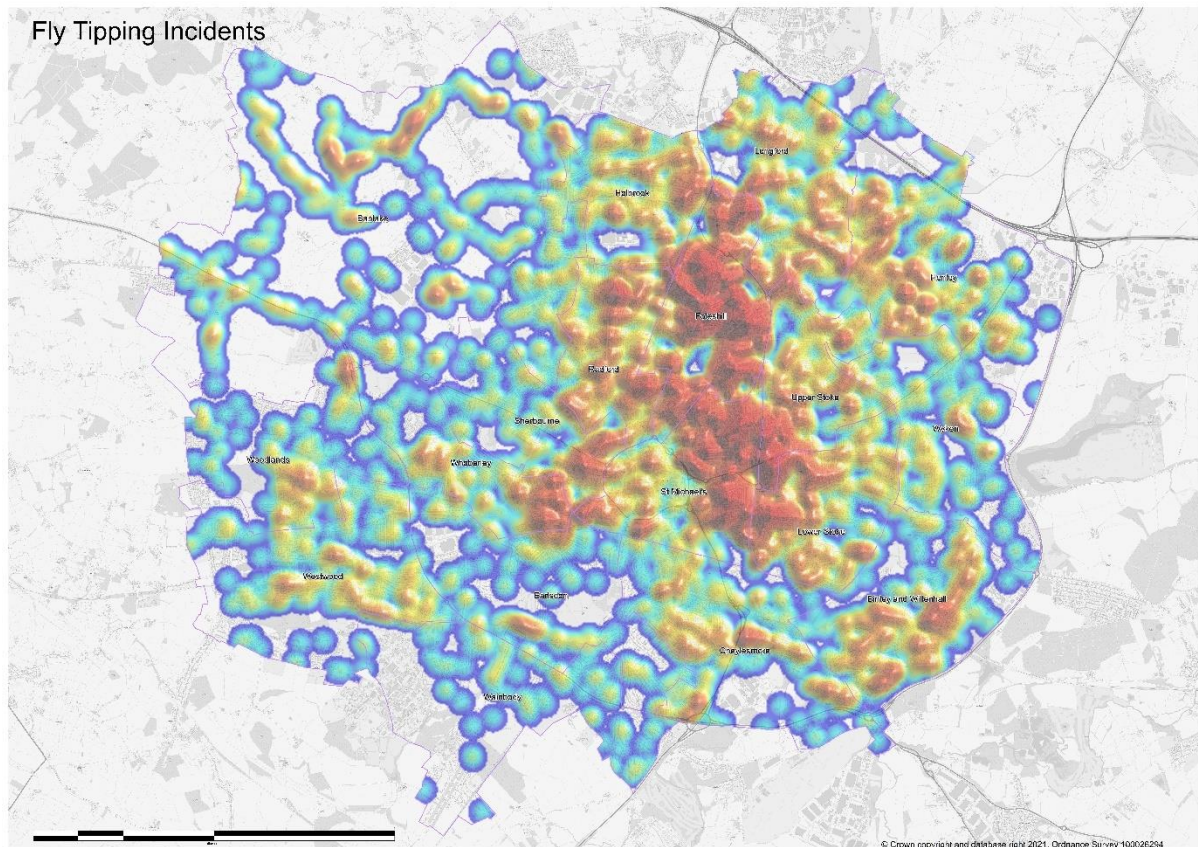




Figure 26: Reported noise incidents

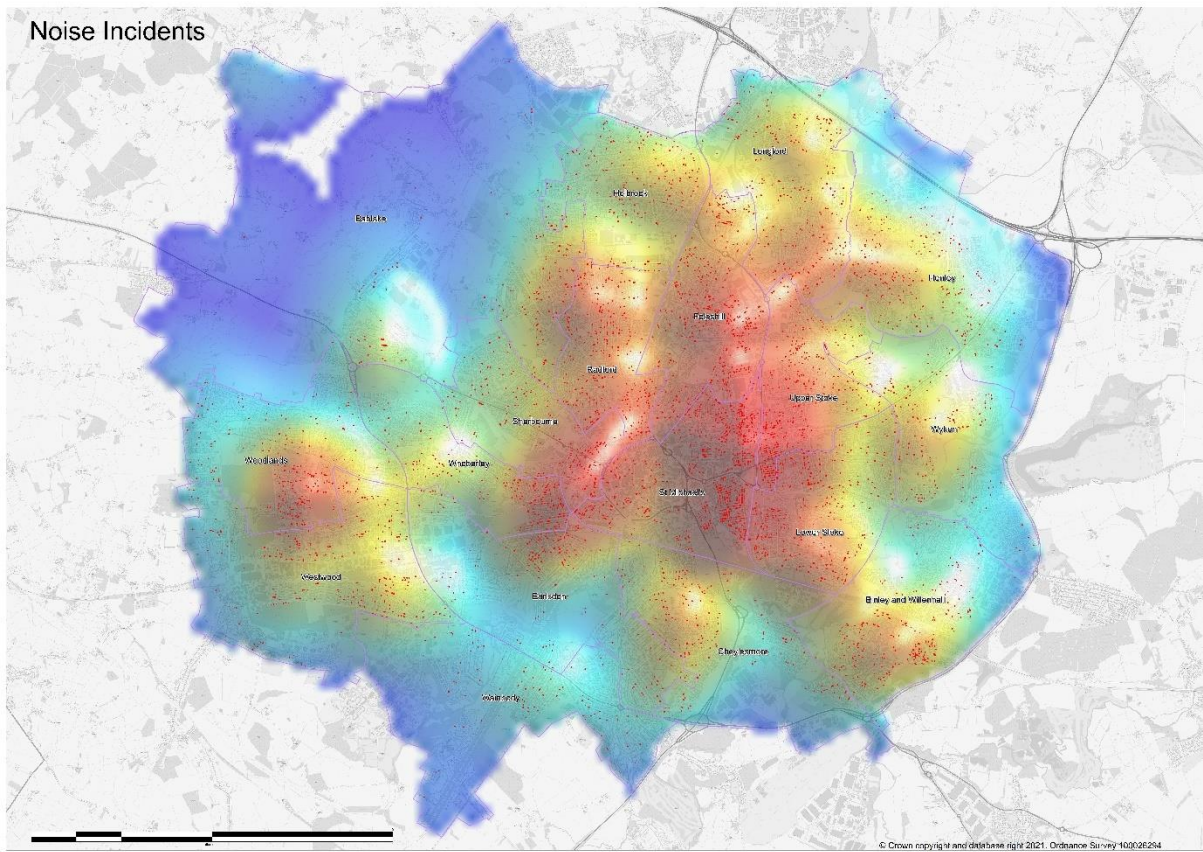


Figure 27: Rat infestation incidents

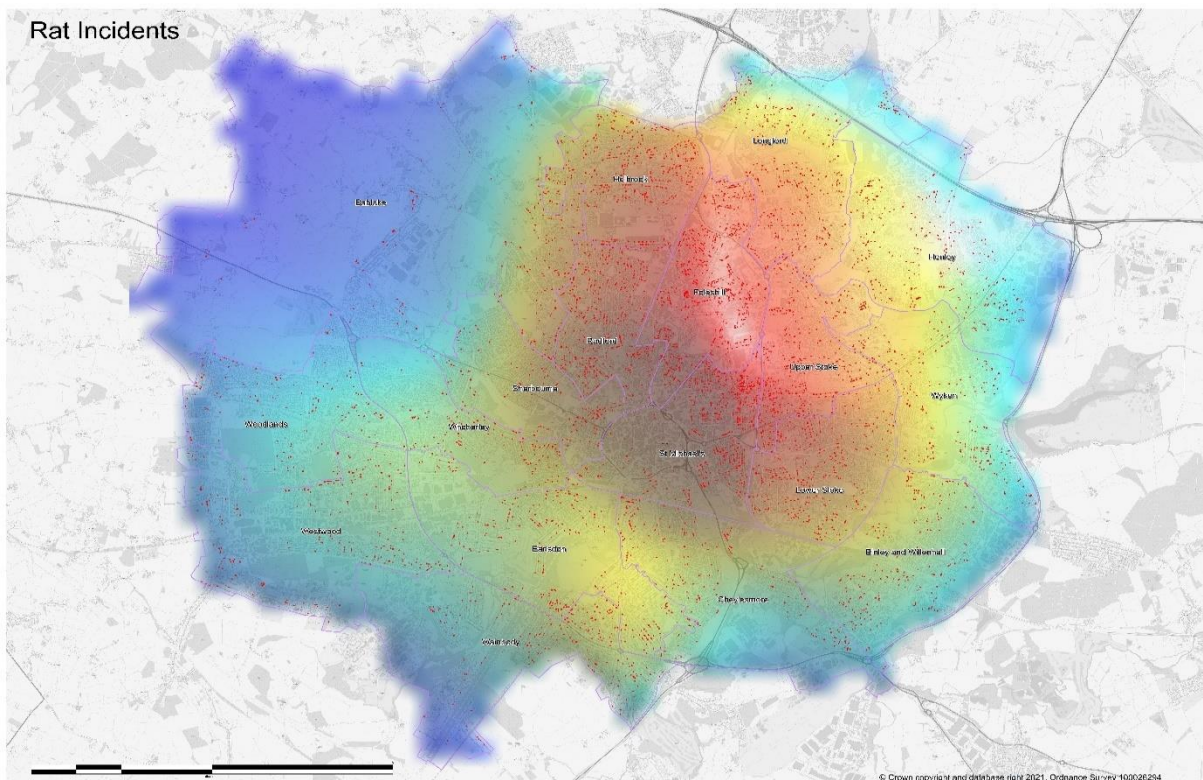


Figure 28: Incidents of reported unsightly gardens, land and property

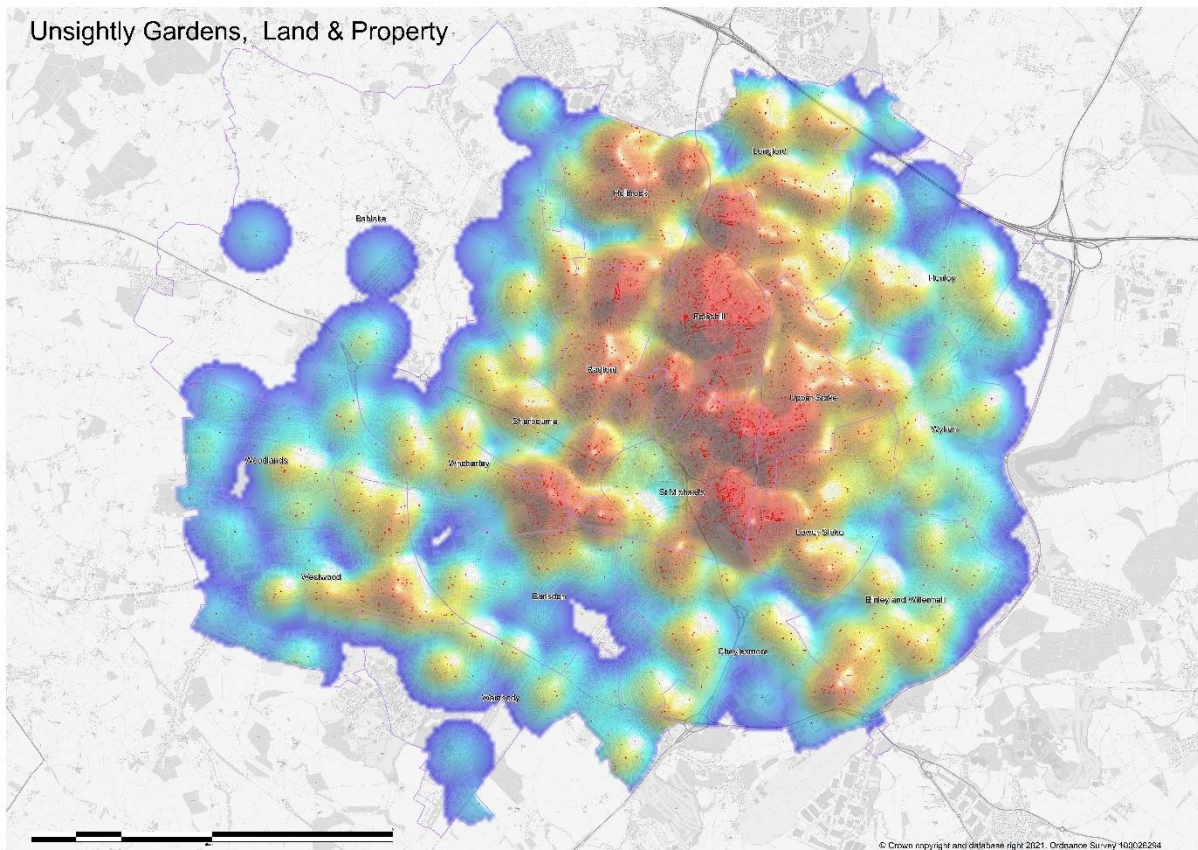
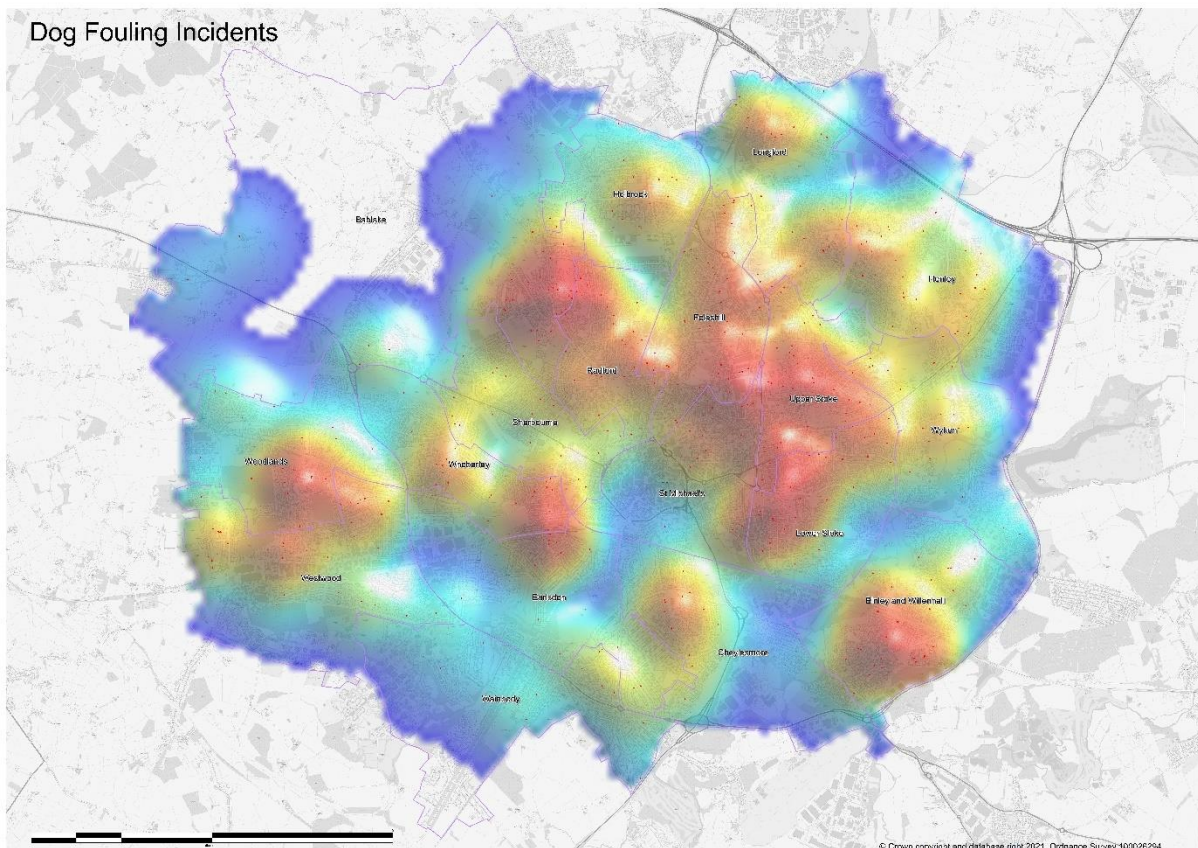


Figure 29: Dog fouling incidents



## 4. Conclusions

4.1 The information presented in this report identifies clear pockets of environmental, economic and social challenges in some parts of Coventry. These demonstrate the potential for harm to amenity in these areas if the Council continue to provide permitted development rights for property owners to convert their homes into Houses of Multiple Occupation (HMO) (six individuals or less). HMOs provide for a far more intensive use of residential areas and result in a much larger population living in areas already of high density. This often leads to conflict and tension due to lack of space, pollution, poor environment and services being stretched. Residents of HMOs are often short-term tenants and transitory and the perception is that they have less stake in the local neighbourhood when compared to the longer term residents.

4.2 Whilst the Council do not consider that all HMOs will cause or exacerbate the social, economic or environmental challenges in Coventry, it does consider that in certain parts of the city there is the potential for harm to amenity. Therefore, the Council considers it is justified in these areas that permitted development rights to convert dwelling houses to a small HMO will be removed, through the making of an Article 4 Direction.

4.3 The removal of permitted development rights will mean a proposal to convert to a HMO will require planning permission for a small HMO. This will allow the Council to fully assess the impact of the proposal on existing and future residents, neighbouring residents and the neighbourhood as a whole. It will also allow the Council, if it were minded to approve the proposal, to require certain improvements through condition, such as bin stores, sound insulation, parking arrangement provision and other matters that can be conditioned and enforced, where necessary.

4.4 The areas that the Council considers it appropriate to remove permitted development rights and would benefit from being within an Article 4 designation would be in the following wards:

- Cheylesmore
- Earlsdon
- Foleshill
- Lower Stoke
- Radford
- St. Michaels

- Sherbourne
- Wainbody,
- Whoberley
- Westwood
- Upper Stoke

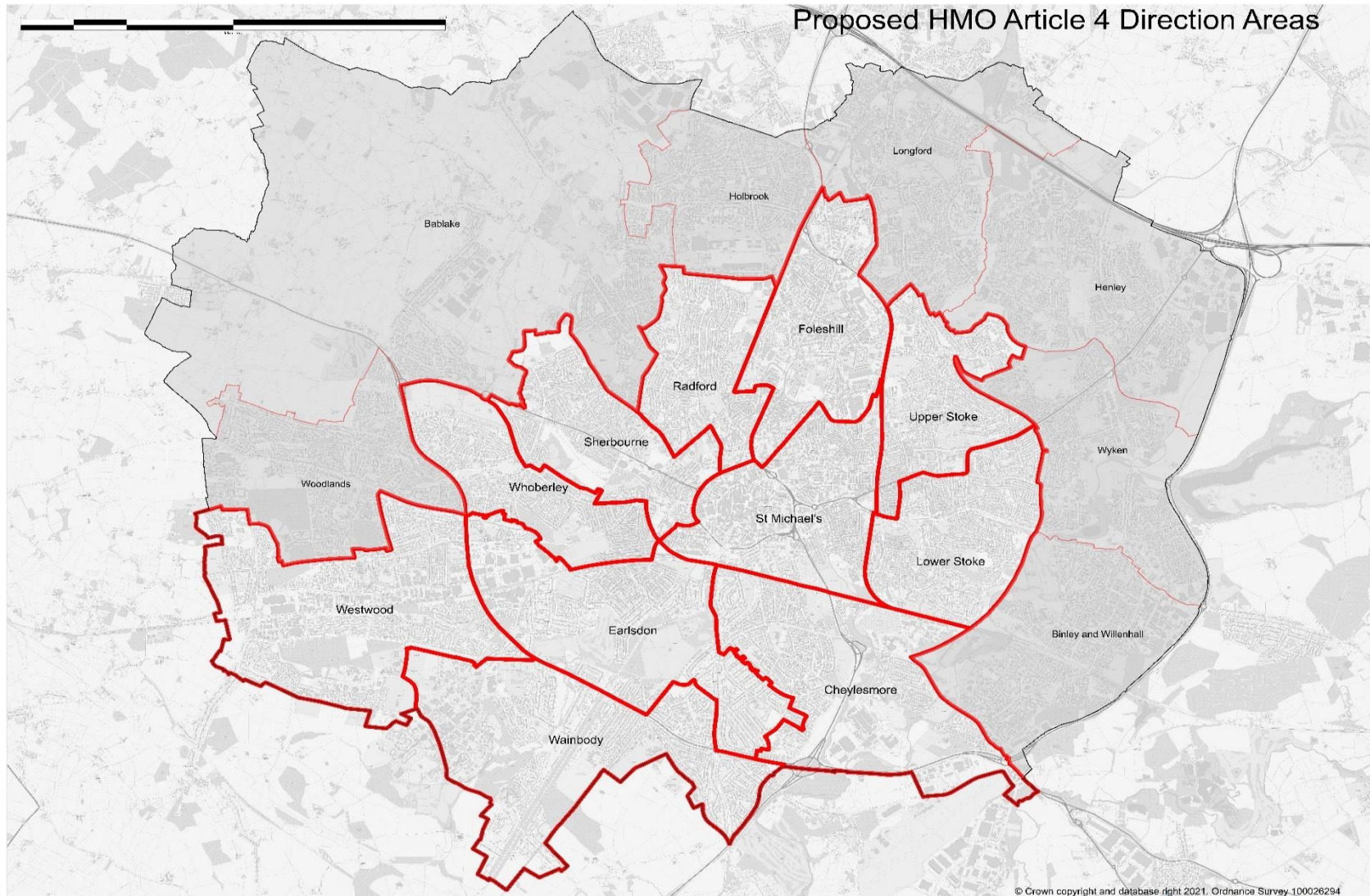
These areas are identified in Appendix 1. The rationale is based on a review of the available evidence on HMO density, an analysis of Lower Super Output Area (LSOA) data and local community feedback that links issues such as anti-social behaviour back to the intensity of HMO concentrations. This approach also considers the issue of displacement, ensuring that developers cannot simply move a few yards down the road from an existing hot spot and renew the HMO development process. A ward based approach also offers easily understood boundaries in that existing ward boundaries are well established and generally well understood. Specific justifications for the removal of permitted development rights to convert to a HMO is as follows:

- The identified wards have a greater proportion of its population under 30 years of age. This demographic would be more likely to live in smaller accommodation.
- The identified wards also has a higher proportion of its population who are single person households. These households are also much more likely to live in smaller accommodation.
- The identified wards have a greater proportion of households that privately rent. HMOs are mostly privately rented accommodation.
- The identified wards have the highest affordable housing requirement in the city.
- The identified wards have a much higher proportion of its housing stock as terraced homes. These are often smaller homes that can be easily converted to small HMOs. They are often in high density areas in which people are already living in close proximity to their neighbours.
- The identified wards are characterised by larger Victorian terraced and semi-detached homes with smaller terraced homes on back streets.
- House prices, generally, in the identified wards are broadly lower in value than those in other parts of the city.
- The identified wards have higher levels of overcrowding than other areas the city, such as Bablake. These are areas that also have are also characterised by higher density homes.

- The areas of Coventry that have the most areas in the 10% most deprived nationally include Wainbody, Whoberley, St.Michaels, Lower and Upper Stoke, Sherbourne and Radford.
- The unemployment rates in the identified wards are higher than in other parts of the city.
- A greater proportion of residents in the identified wards have lower qualification levels than other parts of the city.
- The identified wards have a greater proportion of their working age population in lower paid employment types, such as sales, care and unskilled labour. Lower wages in these areas impacts on the choice and quality of accommodation that people have access to.
- The number of vacant homes is highest in the identified wards compared to the rest of the city. The provision of large numbers of HMO accommodation may be suppressing demand for other housing stock in these areas. Low demand for homes may make owners consider subdividing their property to HMOs which will exacerbate the issues.
- The identified wards have the highest rates of homes that are in poor condition (i.e. do not meet the 'decent' standard). Across Coventry, the rates of non-decent homes are markedly higher in the private rented sector than owner-occupied.
- The identified wards experience the highest rates of housing standards service requests due to poor housing and property conditions.
- Generally, the identified wards experience the greater instances of environmental and social problems, including crime, anti-social behaviour, nuisance neighbours, rowdy behaviour, fly tipping and dog fouling. These issues can be made worse by overcrowding and poor quality homes.
- The identified wards have the largest number of complaints in relation to HMOs and planning enforcement. Many of the complaints cannot be resolved due to the conversion of the HMO being permitted development.

4.5 It is considered that these issues are long term problems that have many causes. These issues create a situation which makes these areas suitable for large numbers of smaller homes to be converted to HMOs through permitted developments rights. In turn, this potential for conversions to HMOs is likely to exacerbate many of the issues listed above. It is therefore considered important that the Council seek to manage HMOs to ensure that the potential impact is considered.

## Appendix 1: Proposed HMO Article 4 Direction areas



If you need this information in another format or language,  
please contact us

**Telephone: (024) 7683 1109**

**e-mail: [planningpolicy@coventry.gov.uk](mailto:planningpolicy@coventry.gov.uk)**