

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)
Regulation 19: Summary of Representations

DPD:

Organisation/ Respondent / agent	Section	Complies with Duty to Cooperate?	Legally Compliant?	Sound	Respondent changes	Does respondent wish to appear at EIP	Representation (summary)	CCC response	CCC suggested proposed change to DPD
Paul Liggins (ACWCS)	None	Yes	Yes	Yes	None	No	My comment on this document covers one simple point, car parking, HMO's are notorious for causing parking issues, it should be incumbent on the owner/ landlord to ensure/supply adequate parking is available to the inhabitants that do NOT impact on local neighbours parking requirements, three or more cars parked adjacent to one property can cause great inconvenience to local neighbours	Policy HMO4 already addresses this point.	No change.
Phyllis Hyde	None	Yes	Yes	Yes	None	No	It is not the job of ordinary citizens or local businesses and organisations to judge this. You have access to legal advice and using a public consultation for this is pointless and a lost opportunity if you are really interested in getting feedback on the policies.	Public consultation is a legal and statutory requirement for all DPDs of which this DPD has been subject to in accordance with the relevant legislation and Councils SCI.	No change.
Liz Boden (Historic England)	Policies HMO1 and HMO4	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Historic England welcomes the references within the DPD to the historic environment. We suggest clarification of the phrasing within	Agreed.	Suggested change to delete the word 'historic' and

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							Policies HMO1 and HMO4 to make clear that proposals for the provision of HMOs should avoid harming the significance of heritage assets (both designated and non-designated), including effects on their setting. In addition, we suggest that amending the phrasing of the policies from 'historic assets' to 'heritage assets' would better reflect the wording of the NPPF.		replace with 'heritage' and insert the words '(both designated and non-designated), including effects on their setting' in policies HMO1 and HMO4.
David Swanson (Cannon Park Community Association)	Para 5.4	Yes	Yes	Yes	The statement should define small HMOs as properties for 6 OR LESS UNRELATED OCCUPANTS.	No	There is an incorrect statement in Para 5.4 on Page 15 of the DPD which states that a small HMO relates to properties proposed for LESS THAN 6 UNRELATED OCCUPANTS IN A SINGLE DWELLING.	Agreed	Suggested minor change to remove '6' and replace with '7' in Paragraph 5.4.
George Moore	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	A 10% top limit is, in my view, too high. In the popular areas, mostly near the Universities as the map in Appendix 1 clearly shows, the number is already above this. And the number of examples of sandwiching are likely to be too high. I agree that being a landlord is not the money spinner it once was in Coventry. National Planning and Taxation changes have seen to that. As have Coventry's Licensing	A single threshold has been set at 10% which is considered to be a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover,	No suggested change.

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							<p>Schemes which deserve praise – even though they were belated. But when landlords sell up in my street their houses are no longer suitable for families because the original conversions to HiMOs have been crude and it would be very expensive to make family homes of them again. They are often advertised as a house with X number of bedrooms. They are therefore generally bought by another HiMO landlord. As I understand it the DPD will not change this situation. Sandwiching considerations seem to me to be the best way to go forward. A 10% overall numerical limit on the number of HiMOs in any Article 4 designated Ward would not solve the problem of very high density HiMO streets or areas within that Ward – though it would help those areas where the number was below 10%. If the DPD is adopted there might well be a flood of Planning Applications before it becomes effective. The DPD needs a stern holding procedure to block this. The language of the DPD is very legalistic. I understand why.</p>	<p>research based on similar size cities across the country which have already implemented a policy intervention of a 10% threshold to address HMO challenges, this suggests that the threshold would be appropriate and reasonable. In terms of the human ‘cost’ referred to the council needs to balance managing the amount of HMO provision in areas where there are particularly high concentrations and any negative impacts arising</p>	

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							But there is little effort to consider the human cost of the excessive number of HiMOs in any locality. The DPD deals thoroughly and effectively with such issues as parking, littering, noise and general threats to amenities. It is less effective in considering the total collapse of community cohesion. Whole areas have become fragmented in all sorts of ways. My own Residents' Association which was once flourishing and effective has now ceased to be! There is simply no longer a community of residents. There is a mention of this sort of issue in the Sustainability document but it would be helpful to see it beefed up a bit. An Article 4 could well be an effective tool in helping to sustain communities.	from this (including the potential fragmentation of communities, as mentioned) with the need to recognise that HMOs provide essential housing for some sectors of the community and policy aims to ensure that this is of decent quality.	
Janet Vaughan	Unanswered	Yes	Yes	Yes	Unanswered	No	No response.	N/A	N/A
Tim Brown (Coventry Society)	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	HMO and private rented sector market: Nationally, there is evidence that 'good' buy to let landlords are exiting the market (due to reasons such as taxation changes and the proposed Renters Reform Bill). Has the DPD, therefore, factored in this	The DPD is based on sound and robust evidence – please refer to https://www.coventry.gov.uk/d	No suggested change.

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							<p>trend so that it takes account of potential planning issues when a new landlord buys existing HMOs and attempts to increase the number of tenants? DPD and the proposed Article 4 Direction to remove permitted development rights for small HMOs: The DPD will only be effective if it is linked with the Article 4 Direction covering eleven wards (and see above). Introduction of the DPD: We are concerned that there may be a surge of planning applications by landlords prior to the date when the DPD becomes effective. We urge that the Council addresses this issue. Although the issue of the adequacy of accommodation for tenants is covered in policies HMO1 and HMO4, it is disappointing that this is not discussed in detail in chapter four. The health and well-being of low income and often vulnerable tenants should be a major concern. Policy HMO1: No comments as we support this policy. Policy HMO2 concentrations and thresholds: (a) We are disappointed that the threshold is set at 10% or more within 100m of an application. This is</p>	<p>downloads/download/7399/evidence-base---houses-in-multiple-occupation-hmos The Council will determine planning applications in accordance with its statutory legal duties and responsibilities. Whilst the DPD and the Article 4 Direction are separate legal procedures, they are linked because once the PD rights are removed by the A4, the policies of the DPD will be applied. In terms of the concentrations, a single</p>	

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							<p>extremely generous – for example 10% of large HMOs would equate as a bare minimum to seventy people which would have major impacts on local amenities and community sustainability. We suggest that the threshold should be reduced to 5%. Policy HMO2 concentrations and thresholds: (b) There are many neighborhoods where the 10% (or 5%) threshold is already exceeded within 100m. The Council should, therefore, be exploring planning and other policy options to reduce the number of HMOs in these situations. Without this commitment, areas that already exceed the threshold will not benefit from this DPD. Policy HMO3: No comments as we support this policy. However, we would like it confirmed that the sandwiching policy applies alongside the threshold and concentration policy i.e. a planning application for an HMO must be considered jointly against both policies and would be rejected if it fails one of or both policies. Policy HMO4: No comments as we support this policy Assessment process – 6.3. calculations: Stages 2 & 3 note that</p>	<p>threshold has been set at 10% which is considered to be a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover, research based on similar size cities across the country which have already implemented a policy intervention (10% threshold) to address HMO challenges, also suggests that the threshold would be appropriate and reasonable. This type of policy has already been found</p>	

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							<p>accurate data on HMOs is lacking. The real number of HMOs is likely to be higher because of HMOs that, for instance, have not been licensed. This supports our suggestion for a lower threshold of 5% (see above). Also we recommend that when an application is submitted, consultation should involve informing all residents within the 100m zone including a request for their views on whether the details of existing HMOs are correct. This would provide valuable information for the licensing team.</p>	<p>sound through examination as explained in the Council's supporting evidence base document. All policies within the HMO DPD will be used to assess planning applications. Planning application consultations for all HMO proposals will be carried out in accordance with the Councils established practice - https://www.coventry.gov.uk/planning-2/planning-process</p>	
Charlotte Laban	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Policy HM04 should include a reference to flood risk. HMOs often	CCC agree that a reference to	CCC would potentially

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(Environment Agency)							<p>have ground-floor sleeping accommodation. This puts those on the ground floor at the highest risk of flooding. Therefore, in areas within the 1 in 100 year plus climate change HMOs should:</p> <p>1. When they are new build, have finished floor levels 600mm above the 1 in 100 year plus climate change level. 2. When they are change of use, raise finished floor levels to 600mm above the 1 in 100 year plus climate change. If this is not possible, a water exclusion strategy and flood resistant construction should be put in place and there should be no ground floor sleeping. This will help residents in HMOs be safer from fluvial flood risk.</p>	<p>the water exclusion strategy in the policy would provide added value but not the specific figures for raising floor levels as it is not considered necessary to apply such detail in policy given that each case is dealt with on its merits and such specific matters can also be dealt with by condition and/or existing building regs. Also, CCC don't believe this is actually necessary and certainly not for new build proposals</p>	<p>agree to include an additional point to Policy HMO4 (h) but we believe the EA already fulfils its statutory duty to consider proposals within flood zone 3 and therefore we do not consider it proportionate or reasonable to make specific reference to detailed figures specifying the need to raise floor heights within the policy. We would suggest a second sentence be added at the end of para 5.16 to read 'HMOs often have</p>

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								because in any event, CCC has not, to its knowledge, ever had proposals for new build HMOs, they are always change of use proposals. The council considers that such a policy might be better considered through the Local Plan Review process where it could be applied to a range of building typologies and considered in the 'round' rather than singling out a particular type of use.	ground-floor sleeping accommodation which puts those on the ground floor at the highest risk of flooding. Specific policy requirements in this regard are therefore considered necessary to help residents in HMO accommodation safer from fluvial flood risk'.
Dave Carter	Policy HMO1	Yes	Yes	No	THE FOLLOWING SUGGESTED	Yes	The PCCWM supports the principle of Policy HMO1, that there should be	Agreed.	

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(Office of Police and Crime Commissioner for West Midlands)					<p>REVISION: "c) there will be no demonstrably adverse impact on the amenity of neighbouring properties or the character and appearance of the area by way of character, appearance, highway safety including parking and historic assets and their setting. The proposal must also meet the criteria in policy HMO4. d) there will be no demonstrably adverse impact on the amenity of neighbouring properties. The proposal must satisfy the criteria in policy HMO4." In addition, subject to the above</p>		<p>clear standards against which future applications for HMOs should be considered. Furthermore, that these standards should include adequate provisions to design out crime, which is specifically addressed within the representation on Policy HMO4. Notwithstanding these points, the earlier representation set out concerns regarding duplication between Policies HM01 and HM04 and these concerns do not appear to have been addressed and there is a resultant lack of clarity. It remains important that duplication/ cross-over risks are avoided. In order to reduce the likelihood of this happening, it is suggested that Policy HMO1 could be amended as suggested.</p>		

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					revision, it is suggested that in principle support to the rationale for clear standards against which future applications for HMOs is agreed.				
	Policy HMO2	Yes	Yes	No	POLICY HMO2 – CONCENTRATIONS AND THRESHOLDS Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported permitted. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO	Yes	The PCCWM notes that the reasoned justification (paragraph 5.10) states that ‘For neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted’. This is a clear policy intent. However, the policy wording is not as explicit, stating only that the application would not be ‘supported’ – it is suggested that the policy wording could be strengthened in line with the reasoned justification to state would not be ‘permitted’.	Agreed.	Minor suggested change to delete the word ‘supported’ and replace with ‘permitted’.

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					applications will be considered against the other Policies in this DPD and all other relevant policies.				
	Policy HMO3	Yes	Yes	Yes	N/A	No	The PCCWM supports the principle of Policy HM03 which deals with “sandwiching” and consider this would serve to prevent the over-concentration of HMOs at the neighbourhood/street level, as affecting individual residents, supporting a better balance and integration of HMO occupancy within a residential area, reduce the potential for crime and disorder, and enhance community safety.	Noted.	N/A
	Policy HMO4	Yes	Yes	No	AMEND: “g) All proposals will be expected to demonstrate how the relevant ‘Secured By Design’ standards have been met.” TO: “g) All proposals will be expected to demonstrate how the relevant	Yes	This policy sets out criteria against which the amenity and design impacts can be assessed. The earlier comments by the PCCWM requested that the policy should make reference to consultation with Design Out Crime Officers (DOCO) and pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures	Agreed that secured by design principles referenced in the policy adds value but not the inclusion of the reference to the Design Out Crime Officers (DOCO) at the pre-application	CCC suggest an amendment to point (g) to read: All proposals will be expected to demonstrate how the relevant ‘Secured By Design’ principles have been met

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					<p>‘Secured By Design’ standards principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.”</p>		<p>are maintained. The latest version of the policy has been amended to include an additional criterion, “All proposals will be expected to demonstrate how the relevant ‘Secured by Design’ standards have been met.” The explanatory text also encourages pre application discussions. The PCCWM welcomes these additions but, at the same, also continue to request that pre-application discussions and submission of an appropriate management plan should be made to strengthen the policy approach. The justification for this is as follows. Secured by Design (SBD) and Designing Out Crime (DOC) are the most sustainable and therefore the most cost-effective of all crime reduction interventions, with little or no evidence of displacement of crime and far more likely to lead to benefits to surrounding areas. Over the past two decades, independent, academic assessments have demonstrated that developments which attain the Secured by Design (SBD) award maintain long term, sustainable reductions in recorded crime. The</p>	<p>stage as this would potentially add to the length of time to an already constrained time period for planning application determination.</p>	<p>including the preparation of a management plan to demonstrate how the crime prevention measures will be maintained.”</p>

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							<p>flagship project, 'The Four Towers' at Duddeston Manor, in nearby Birmingham has maintained a 98.7% reduction (as based on the figures for 1988) in domestic burglary for over 20 years, whilst reductions in other property crime categories replicate the research findings of others. Policies which support the need for development to be SBD would accord with the requirements of the NPPF. The 'broken windows theory' links disorder and incivility within a community to subsequent occurrences of serious crime. Any visible signs of crime and civil disorder, such as broken windows, vandalism, loitering, public drinking, and transportation fare evasion, can create an urban environment that promotes even more crime and disorder (Wilson & Kelling, 1982). The PCCWM has evidence that where there is a lack of maintenance, this can quickly lead to a spiral of decline/neglect if not addressed quickly and effectively. The PCCWM believes the need to design out crime and ensure its continued maintenance in all new</p>		

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							<p>developments and redevelopments is a cornerstone to successful sustainable communities including with HMO properties. Examples of crime prevention initiatives of particular relevance to HMO developments include the need for:</p> <ul style="list-style-type: none"> • Adequate lighting for internal and external communal areas and access(es). • Doors into internal private spaces to be of external access door standard to provide safe and secure areas for individuals in their homes reducing opportunities for theft, intimidation, violence, disorder and fear of crime. • Controlled and regulated access into the properties, including into any separate buildings within the shared communal outdoor space to reduce the risk of unauthorised entry with associated opportunities for crime. The PCCWM is concerned that HMOs can provide an unsafe environment for residents within these developments if they fail to meet SBD Standards and/or if they are not properly maintained to a standard which will reduce the risk of crime, antisocial behaviour, and the 		

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							fear of crime. The earlier representation also suggested that bedroom space standards to DCLG 2015 standards should be adopted. The revised document does not take this comment on board, continuing to rely on the Council's Licensing Standards adopted in 2020. No further comment is made in this respect.		
Sian Thuraisingam (Chapelfields Area Residents' and Traders' Association (CARTA)	All	Yes	Yes	Yes	None.	Unanswered	None.	Noted.	None.
Keith Struthers	Paragraph 5.4	Yes	Yes	No	The last part of paragraph 5.4 should read " less than 7 unrelated occupants in a single dwelling ".	No	Paragraph 5.4 is factually incorrect as it refers to 6 unrelated occupants rather than 7.	Agreed.	Suggested minor factual change to remove '6' and replace with '7' in Paragraph 5.4.
Emily Bond (Natural England)	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	Unanswered	We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural	The SA/SEA process has already screened the requirement for a HRA and the	No suggested change.

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							<p>England has a statutory duty to protect. We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected. Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.</p>	<p>results can be found here: https://coventrycitycouncil.inconsult.uk/HMORegulation19/consultationHome In any case, the Responsible Authority (CCC) as represented by the Ecology Team confirms that it does not consider there are any environmental issues arising from the HMO DPD.</p>	

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SA/SEA:

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Phyllis Hyde	Unanswered	It is not the job of ordinary citizens or local businesses and organisations to judge this. You have access to enfusion advice and using a public consultation for this seems pointless and a lost opportunity if you are really interested in getting feedback on the policies.	Noted.	No suggested change.
Liz Boden (Historic England)	Issues and Framework	We are also pleased to see that protecting and enhancing the historic environment and its setting is identified as a key sustainability issue and that this is encompassed within SA Objective No 8, which we especially note has been strengthened to encompass the setting of heritage assets, following our previous comments on the SA Scoping Report. We also welcome the wide range of sub-objectives/assessment criteria relating to the historic environment, which are included under this SA objective. In relation to SA No 13 Energy, Historic England welcomes the inclusion of the new sub-objective 'Improve energy efficiency of historic buildings', which we suggested adding in our response to the consultation on the SA scoping Report	Comments of support noted.	No suggested change.
	Assessment of the Draft DPD	In relation to the assessment of the draft DPD Historic England is pleased to see that in the assessment of potential impacts those on the historic environment have been considered separately (SA No 8b) from those on landscape, local countryside and open spaces (SA No 8a), as this has improved the focus of the SA on the historic environment.	Comments of support noted.	No suggested change.
	Sustainability Context & Summary Baseline Characterisation	We particularly welcome reference to the need to consider the implications and effects of climate change on the historic environment in this section of the DPD and we consider that the document sets out a comprehensive baseline in relation to the historic environment and landscape.	Comments of support noted.	No suggested change.
	SA of HMO DPD	'SA of Options for Concentrations and Thresholds' – in relation to the summary of the assessment of the DPD's proposed concentrations and thresholds for SA objectives Nos 8a and 8b (Table 4.1 and paragraph 4.8) Historic England considers that the determination of possible major positive effects (++) for the 5% threshold may be too optimistic and indeed it is not possible to be certain that minor positive (+) effects would definitely result from the 100m concentration. Therefore, it is considered that the addition of a '?' would better reflect this uncertainty for the 100m concentration.	The council accepts the suggestions for table 4.1 that the minor positive assessments should include some uncertainty. The council also can accept that maybe major positive uncertain was optimistic but	No change suggested for policy approach as set out in the DPD.

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		<p>In relation to the summary of the assessment of the DPD’s policies on SA objective No 8b (Table 4.2 and paragraph 4.28) it is noted that minor positive effects (+) have been determined for Policy HMO2, whereas the other policies have been assessed as ‘neutral / no impact’ (0), or uncertain as to neutral / no impact (0?). Historic England notes that the intention of policies HMO1 and HMO4 appear to be to ensure no adverse effects on the historic environment and thus we would concur with the SA’s assessment in relation to these policies. However, in relation to the assessment of Policy HMO2, whilst introducing limits for thresholds and concentrations of HMOs should result in minor positive effects (+), again we consider that this is not definite and therefore we consider that the addition of a ‘?’ would better reflect this uncertainty. We consider that this is also the case in relation to the assessment of the effect of proposed Policy HMO2 on SA Objective 8a, as this has also been assessed as a minor positive (+). In relation to the assessment of policies HMO1 and HMO4 on this objective, Historic England considers that the determination of ‘neutral / no impact’ is reasonable, given the protection afforded by these policies to landscapes and townscapes. However, with regard to policy HMO3, we consider that the determination of minor positive effects (+) is not a guaranteed outcome and therefore again we consider that the addition of a ‘?’ would better reflect this uncertainty. This opinion is based on the information provided by you in the documents dated March 2023 and December 2022 and, for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific proposals which may subsequently arise from this, or later versions of the DPD which is the subject of this consultation, and which may, despite the SA, have adverse effects on the historic environment.</p>	<p>it does include uncertainty and we were trying to identify some nuanced relative differences between the options. So, even if we were to take a ++? to a +?; and change the + and + to a +? and a +? – (there are no significant negative effects) but indications for some positive effects with uncertainty. We note however, that this point has not suggested any further measures that could enhance effects or provide more certainty or anything useful for the plan itself. The historic environment is only one factor in the SA. The SA is only one piece of evidence that informs decision-making for plan-making. The important bit for SEA regs compliance is paras 4.10-4.11 – outline of reasoning which we note this representation has not commented on. Also, the council is happy to accept that in table 4.2, + could change to +? For policies HMO2 & 3. So, the council would agree that such</p>	

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			changes are not substantial enough to revisit the proposed policy approach. SA/SEA is all about significant effects and it does allow for considering the uncertainty of predicted effects.	
Emily Bond (Natural England)	Unanswered	It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.	Noted.	No suggested change.