INTRODUCTION

Why an HMO Subject Plan?

There is growing concern at the increasing number of Houses in Multiple Occupation (HMOs) and the concentration of such accommodation in certain parts of the Coleraine Borough Council area.

Local community groups and the media have highlighted the impact that such accommodation and associated issues are having on the amenity of these areas. Some of the issues relating to HMOs have been raised through the work of the Balanced Communities in Coastal Settlements Review Group and the HMO Working Group, both chaired by Council Officers.

Issues associated with concentrations of HMOs include: -

- Lack of community integration;
- Detrimental impact on residential amenity as a consequence of night time entertainment at residences and in adjacent areas;
- Late night street noise and disturbances, particularly as persons return on foot from other places to residences;
- Service delivery problems such as waste / refuge collection and public transport provision;
- Localised prevalence of unsightly ‘To Let’ boards;
- Neglected appearance of dwellings and their overall curtilages;
- Dumping of house clearance material, sometimes during but mainly at the end of university terms;
- A greater incidence of crime, especially burglaries and a higher perceived fear of crime; and
- Increased parking demand and the associated pressure on existing on-street parking availability.

The Draft Northern Area Plan 2016 (NAP), published in May 2005, set out criteria for Conversion of Buildings for Multiple Occupation
under Policy HOU 6. Representations received during public consultation on NAP suggested the policy did not go far enough in addressing the issues related to HMOs and in particular, lacked a spatial dimension.

A Subject Plan that specifically addresses the issues of HMOs within Coleraine Borough is considered the best method of developing and implementing planning policies for the Borough, particularly for those areas where HMOs are concentrated.

The HMO Subject Plan will cover Coleraine Borough Council area and is intended to run parallel with the ongoing preparation of NAP. The Subject Plan will provide planning policy on the specific topic of HMOs in Coleraine Borough Council area for the period up to 2016.

The Department of the Environment (DOE) published a “Notice of Intention” to prepare an HMO Subject Plan for the Coleraine Borough Council area in regional and local press, commencing on 22nd February 2006.

What is an HMO?

In May 2004 the Housing Executive introduced a Statutory Registration Scheme for HMOs. The scheme defined an HMO as “a house occupied by more than two qualifying persons, being persons who are not all members of the same family”.
Registration with the Housing Executive will be dependant on meeting criteria in relation to management of the property, compliance with physical standards (including safety standards) and any adverse impact the proposal will have upon the amenity or character of the area.

Following publication of the Planning (Use Classes) Order (Northern Ireland) 2004, all new proposals for HMOs (as defined by Article 143 (1) of the Housing (NI) Order 2003) now require planning permission.

The Issues Approach

This Issues Paper is prepared in accordance with the requirements of Article 5 (3) of The Planning (Northern Ireland) Order 1991. It is intended to guide and encourage debate and discussion focused on those issues of significance, which will shape the preparation of the Draft Plan. For ease of use, this Paper sets out a series of issues. (See page 15).

The Planning Service, an Agency within the Department of the Environment, has prepared this Issues Paper.

Partnership Working

The issues surrounding HMOs are diverse and therefore need to be tackled in a multi-disciplinary way through partnership with other relevant bodies. Planning policy represents only one strand of a comprehensive strategy for addressing the issues associated with HMOs. Such a strategy should embrace planning policy, alternative opportunities of meeting housing needs, area management, new design solutions, service infrastructure and service provision if the issues are to be fully addressed.

The Coleraine Borough HMO Subject Plan is being co-ordinated through an Inter-Agency Steering Group. The Planning Service and other key agencies such as the Environmental Health Department of the Council, the Housing Executive, the University of Ulster, the Police Service of Northern Ireland and the Roads Service are represented on the group. The Housing Executive will provide a housing market analysis of the Coleraine Borough to inform the preparation of the Subject Plan. Through the Plan, Planning Service
will develop and subsequently implement spatial and land-use planning policies for HMOs.

Plan Purpose

The Coleraine Borough HMO Subject Plan will: -

• Consider the possibility of limiting the number of HMOs within defined areas (% capping);

• Endeavour to accommodate housing need in relation to the HMO issue;

• Consider ways of improving the quality of the environment in areas where HMOs are concentrated; and

• Seek to facilitate planning policies or mechanisms which will lead to an improvement in residential amenity of areas where HMOs are concentrated.

In addition, and as part of the partnership approach, Planning Service will also consider: -

• The potential demand for the provision of purpose built and managed student accommodation in suitable areas; and

• The role HMOs could play in regeneration.
Coleraine Borough HMO Subject Plan 2016

Private Rented Property Tenure by Ward for the 'Triangle' Area

- Settlement Development Limit (Draft NAP 2016)
- NIHE HMO Area
- HMO Property (Oct 2005)

HMO Areas for Portstewart:
1. Harryville
2. The Warren
3. Burnside
4. Mill Road

Private Rented Property Tenure by Ward:
- 5 - 66
- 67 - 139
- 140 - 296

(Source: 2001 Census)
REGIONAL POLICY CONTEXT AND GUIDING PRINCIPLES

Regional Development Strategy (RDS)

The Subject Plan for Houses in Multiple Occupation will be developed within the context of the RDS. The RDS seeks to promote sustainable patterns of development and recognises the development of balanced communities should be encouraged by promoting a mix of housing tenures and types. Also, the creation of quality built environments can contribute to the achievement of safe, complete and balanced communities.

Planning Policy Statement 7 (Quality Residential Environments)

This highlights the need for residential development in urban areas to respect its immediate setting in order to avoid a level of intensification, which can adversely affect local townscape character and identity.

Planning Policy Statement 12 (Housing in Settlements)

This provides planning control principles for housing within the context of the Strategic Planning Guidelines contained in the RDS. Its objectives include:

• Management of housing growth in relation to housing need;
• Achieving more sustainable patterns of residential development;
• Promoting the provision of higher density urban housing; and
• Encouraging the development of balanced local communities.

Policy HOU 6 of Draft Northern Area Plan 2016

This identifies the criteria for granting planning permission for the conversion of buildings to multiple occupation. The policy
also highlights that provision of this type of housing should be controlled in order to ensure that the accommodation is of a satisfactory standard, and that there is no adverse impact on the amenity of neighbouring properties and the character of the surrounding area.

**Sustainable Development**

The United Kingdom has embraced the principle of sustainable development based on stewardship of the environment and has widened the concept to include economic and social considerations. Consequently, preparation of the Subject Plan will include the objectives of social progress that meets the needs of everyone and effective protection of the environment.

**New Targeting Social Need (New TSN)**

New Targeting Social Need (currently under review) involves tackling social exclusion by targeting efforts and resources towards people, groups and areas objectively defined as being in social need. Whilst Planning Service is not a major spending Agency, it is a function of the Subject Plan to facilitate development and create a land use framework that will allow investment to take place.

**Strategic Environmental Assessment**

The policies and proposals contained within the Plan may be subject to a Strategic Environmental Assessment.

**Equality of Opportunity**

The Northern Ireland Act 1998 has placed the following statutory requirement on each public authority: -

1. To carry out their functions with due regard to the need to promote equality of opportunity: -

   (a) Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
(b) Between men and women generally;
(c) Between persons with a disability and persons without; and
(d) Between persons with dependants and persons without.

2. Without prejudice to its obligations under subsection 1 above, a public authority shall, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Department will seek to ensure that the Plan meets the provisions of the Northern Ireland Act 1998.

RECENT TRENDS

The two principal factors that have driven the growing need and demand for HMO accommodation in Northern Ireland are:

- The changing demographic profile; and
- The increasing intake of students into higher education.

The following analysis focuses on Coleraine Borough Council area. The most significant concentrations of single person households, private renting and HMOs can be found in the Coleraine, Portrush and Portstewart ‘triangle’ area.

Demographic Change

Trends in GB have exhibited an increasing number of single person households due to lifestyle preferences, postponement of families and relationship breakdown.

In 1998, approximately 27% of households in GB were single persons. According to the 2001 Census, this figure had risen to 30%. The 2001 census also recorded that 27% of households in Northern Ireland were single persons and that 14% of households in the Coleraine Borough were single persons. Between 1991 and 2001 the number of single person households under pensionable age doubled in Northern Ireland. Over 50% of all single person households are now under pensionable age.
Student Intake

Within the Coleraine Borough Council area, student housing in the form of HMOs is concentrated in the ‘triangle’ area. Government policy has seen a significant increase in the number of students in higher education over recent years. However, the University of Ulster (UU) has indicated that increasing numbers of students are living with parents and/or taking part-time courses, reducing the need for term-time accommodation. It is believed this trend may continue if “top-up” fees are introduced, commencing in the 2006/07 academic year. During the 2003/04 academic year the University of Ulster at Coleraine had approximately 5,500 registered students, of which 2,623 had a term-time address within the ‘triangle’ area of Coleraine, Portrush and Portstewart. The University does not anticipate any significant increase in student numbers between 2004/05 and 2008/09.

Private Rented Sector

HMOs are most often found in the private rented sector. This sector plays a vital role in the overall housing market and provides accommodation for those who are unable, or would prefer not, to access home ownership or the social rented sector.
In 1991 the Census recorded that private renting represented only 5.8% of all tenures in Northern Ireland. By Census 2001, this figure had risen to 9.2%. Private renting tends to be concentrated in urban areas.

Census 2001 recorded that there were 1,957 households rented from a private landlord or letting agency within the Coleraine Borough Council area. This represents 9.1% of all household tenure in the Council area and approximately 5% of Northern Ireland’s private rented accommodation. Census 1991 recorded that there were 1,094 households rented privately. This represented 6.2% of all household tenure in the Council area. There has been approximately a 79% increase in private rented accommodation in the Council area between 1991 and 2001.

The private rented sector in Northern Ireland now makes a significant contribution to meeting housing need and rising demand and particularly where affordability is an issue.

As the trend of rising house prices continues, affordability may become a greater issue.
HMOs

The introduction of the Housing Executive’s Statutory Registration Scheme has made it easier to record the distribution of HMOs. Their geographic pattern very much emulates the distribution of the private rented sector and single person households. According to information supplied by the Housing Executive (Oct 2005), there are approximately 11,000 HMOs in Northern Ireland. Within the Coleraine Borough Council area there are approximately 1,300 HMOs, which equates to almost 12% of the regional total, with the greatest concentration being in the ‘triangle’ area and particularly Portstewart.

Number of HMOs by Location

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of HMOs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portstewart</td>
<td>626</td>
</tr>
<tr>
<td>Portrush</td>
<td>357</td>
</tr>
<tr>
<td>Coleraine</td>
<td>240</td>
</tr>
<tr>
<td>Remainder of Coleraine Borough Council area</td>
<td>87</td>
</tr>
<tr>
<td>Coleraine Borough Council area</td>
<td>1,310</td>
</tr>
</tbody>
</table>

Source: NIHE (Oct 2005)
THE ISSUES

The aim of this Paper is to promote debate on issues, which are likely to influence the preparation and development of the HMO Subject Plan. The format is designed to highlight major opportunities and constraints for comment.

This Paper presents a range of issues to which there may be a variety of responses. Its purpose is to encourage debate on the relevant issues; therefore, it does not contain predetermined solutions.

The issues raised in this Paper are not exhaustive. Comment on any issue of relevance to the Subject Plan is welcomed, whether or not it is referred to in this Paper. All representations received by the Department in relation to relevant issues will be given consideration in the preparation of the Draft Subject Plan.

Where an issue cannot be addressed by planning policy, it will be referred to the Inter-Agency Steering Group for consideration.

1. The Housing Market and HMOs

A Housing Need Assessment, prepared by the Northern Ireland Housing Executive, was published as a technical supplement to the Draft Northern Area Plan 2016. The Assessment considered housing trends across a number of housing categories, many of which are
relevant to those parts of the Coleraine Borough where HMOs are concentrated. This included an analysis of social housing, the private rented sector, student accommodation and affordable owner occupied housing.

The Assessment highlighted a number of trends: -

- The Coleraine, Portrush and Portstewart ‘triangle’ has a concentration of HMOs providing student accommodation;
- A significant increase has occurred in the private rented sector in Coleraine Borough between 1991 and 2001;
- There are emerging affordability issues in Coleraine Borough;
- The NIHE have declared a large HMO area in Portstewart, which will focus grant aid and improvement to standards;
- Concentration of second homes in the ‘triangle’ area; and
- Student numbers residing in the triangle area have decreased from 1989/99 to 2003/04 and no significant increase is envisaged.

What is the likely future demand for HMO accommodation and what factors will influence this?

What other housing needs are there in areas where HMOs are currently concentrated?

How do the different categories of Housing Need relate to one another?

Could the student village concept help meet student needs and what opportunities are there for such developments?

What impacts will the housing need from migrant workers have?

What role can HMO development play in regeneration?
2. Spatial Policy

The Draft Northern Area Plan 2016 did not designate specific areas in relation to the future control of HMOs. It is recognised that a spatial plan will not, in itself, deal with all of the issues presented by over-concentration of HMOs, but it will have the potential to limit the level of HMO provision in particular areas.

The Housing Executive has identified HMO Action Areas as part of its statutory registration scheme for HMOs. These could represent the basis for planning policy designations.

Should future HMO development be concentrated or dispersed?

What criteria should be applied in identifying areas where further HMO development may be restricted?

Should the HMO Subject Plan include policies to control HMO development outside those areas where HMOs are concentrated?

Should a percentage limit be introduced on the proportion of HMOs in certain areas?

Are there any other means by which the Plan could address spatial policy issues?
3. Balanced Communities

Both the RDS and the Draft Northern Area Plan 2016 state the importance of having balanced communities. Under the RDS, Strategic Planning Guideline HOU 6.1 states ‘Provide a housing choice by achieving a mix of housing tenures and house types which will help create more balanced communities’.

The concentration of HMOs has altered the residential profile of some neighbourhoods, in particular within the ‘triangle’ area where many students choose to live. As a result, long-term residents can feel marginalised and their quality of life can be adversely affected.

This can potentially lead to tension between the ‘host’ community and new residents. Local services such as schools and community facilities may be under threat as their customer base changes significantly.

In what ways can the Plan promote more balanced communities in areas where HMO ‘s are concentrated?

4. Area Amenity

HMO accommodation is often characterised by short-term tenancies. The high turnover means that residents seldom see themselves as part of that community. As a consequence, they may not have a long-term commitment to the area, and as a result, community pride and cohesion suffer.

HMO accommodation can become untidy when responsibility for its upkeep is shared. This, coupled with regular changes of tenancy and higher than average levels of wear and tear, can have an impact on the physical fabric of such dwellings.

The high level of turnover also gives rise to:

- Numerous and often unsightly ‘To Let’ boards; and
- Illegal dumping when tenancies change.
How can the negative impact of HMOs on the physical appearance of an area be reduced?

What can planning policies do to encourage owners, landlords, agents and short-term residents to address the issues that can damage a residential area’s amenity?

5. Physical Infrastructure

There are various issues associated with physical infrastructure requirements in areas where HMOs are concentrated. These include:

- The provision of adequate services, particularly waste disposal in areas with relatively high densities of population;

- The additional demands on parking provision. In some instances the provision in areas where HMOs are concentrated is limited to incurtilage parking or in some cases only on-street parking.

What measures should be taken to upgrade utilities in areas where HMOs are concentrated?

Are there any ways in which the provision of parking can be improved in areas where HMOs are concentrated?
6. Anti-social Behaviour

Areas with a high concentration of HMOs often experience above average levels of anti-social behaviour. Residents, both short-term and long-term, not only suffer the nuisance such behaviour brings but often feel intimidated and concerned for their personal safety. The anti-social activities associated with HMO areas include: -

- Drinking in the street and other forms of anti-social behaviour;
- Damage to property and parked cars;
- Noisy house parties;
- High incidences of disturbance from revellers returning home; and
- Burglaries and muggings.

**Are there any particular ways in which the built environment contributes to anti-social behaviour in HMO areas?**

**Are there any ways in which the planning system can help reduce anti-social behaviour in areas where HMOs are concentrated?**
Other Issues

There are a number of issues in relation to HMO areas which fall outside the remit of the Subject Plan and may be taken forward by the appropriate bodies. Area Management within HMO areas is an important consideration for their future development. The social lifestyle associated with HMOs, particularly those occupied by young singles and students, can give rise to a higher incidence of littering, dumping of materials, increased refuse collection and disposal, noise pollution and crime (such as drinking on the streets, burglaries and vandalism). The improper disposal of litter and refuse tends to increase with frequent changes of tenancy. There are various strands to area management, which include:

- **Management of Street Cleaning / Refuse Collection and Disposal**: The Technical Services / Building Control Department of Coleraine Borough Council is responsible for dealing with street cleansing, refuse collection and disposal.

- **Management of Noise Control**: The Environmental Health Department of Coleraine Borough Council is responsible for pollution and noise control.

- **Management of Crime / Vandalism / Anti-Social Behaviour**: The PSNI are responsible for policing.

- **Management of Community Safety**: Wardens schemes may be used in areas where high concentrations of HMOs give rise to significant and persistent adverse effects such as anti-social behaviour, crime, environmental damage and deterioration in public order. Wardens schemes aim to reduce crime, fear of crime and anti-social behaviour, and in doing so improve the quality of life for residents, students and the private sector alike. The setting up, management and funding of wardens schemes involves a number of agencies including the Housing Executive.
**NEXT STEPS**

Comment is invited on the issues raised in this paper and on any other matters, which may be relevant to HMO planning issues. Comment must be submitted no later than **5.00 PM on Monday 10 July 2006**.

Comment can be submitted in the following ways:

1) **Written comment to:**
   
   Coleraine Sub-Divisional Planning Office  
   Coleraine Borough HMO Subject Plan  
   County Hall  
   Castlerock Road  
   Coleraine  
   BT51 3HS

2) **By e-mail to:**
   
   divisional.planning.office.coleraine@nics.gov.uk

3) **By fax to:**
   
   (028) 7034 1434

**Note:** The Issues Paper will also be available through the Planning Service website at [http://www.planningni.gov.uk](http://www.planningni.gov.uk)

One or more events will take place at which members of the public or other interested parties will be able to participate in order to comment and discuss the Issues. These events will be advertised as appropriate and chaired by consultants appointed by the Department. The consultants will submit a report to the Department, which will collate the views recorded at these events.

All views expressed and recorded by 10 July 2006 together with those conveyed through the consultant’s report, will be considered in the preparation of the Subject Plan.

It should be noted that all representations received may be available for public inspection during the plan preparation process.