Houses in Multiple Occupation

Interim Planning Guidance Note

Adopted 24.03.2026

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1. Introduction

1.1 Houses in Multiple Occupation (HMOs) provide small, affordable, flexible and safe accommodation for a wide variety of people including single people, students, low paid and seasonal workers, those on short term contracts and are an essential part of the housing market. They can also offer temporary accommodation for people who are saving to purchase a home.

1.2 Houses that provide accommodation for at least 3 people who are not all members of the same family are known as HMOs. In Flintshire these are usually created through the conversion of buildings, either currently residential or in other uses.

1.3 Poorly located and designed HMOs can lead to problems, both for the occupants and for neighbours, due to the more intensive nature of accommodation within an HMO. These issues can affect living standards and include, noise, disturbance, loss of privacy and inadequate living accommodation. Similarly, an over-concentration of HMOs, or those that are poorly located, can harm the character of an area.

1.4 Given the emerging trend for the development of HMOs in Flintshire, and particularly in certain locations such as Deeside, the Council has produced this interim policy guidance note. It aims to advise prospective applicants about the requirements of the Local Planning Authority (LPA) and for relevant information and evidence to be prepared and submitted in support of planning applications for HMOs, in order to properly consider the planning implications . It is important to state that the Public Protection legislation sets out additional standards and requirements which will not be addressed in this note. Applicants will need to consult FCC's Community and Business Protection Department for the full requirements.

1.5 The Adopted Local Development Plan (LDP) includes Policy HN7 Houses in Multiple Occupation. This criteria-based policy aims to ensure that the development of an HMO does not cause significant detrimental effects to the building, locality or community. This Interim policy guidance note includes additional guidance in respect of each criterion and adds more details on how the Council intends to manage the development of HMOs. This Interim policy guidance note will be used in the determination of any planning application for the development of HMOs within Flintshire. Given the present lack of a licensing scheme for smaller HMOs, the evidence does not exist to inform and justify the identification of a 'threshold' of the number of HMOs in an area, beyond which harm would occur. When an additional licensing scheme is developed in Flintshire this will facilitate the mapping of the location of the HMOs. Once this is available, a revised SPG will be prepared and consulted upon. Until such time, this document represents an interim policy guidance note.

2. Definitions

2.1 The definition of what constitutes an HMO primarily relies on legislation concerning the private rented sector i.e. Housing Act 2004. In simple terms, an HMO is defined as a property where occupants share one or more basic amenities (i.e. a toilet, personal washing facilities or cooking facilities), and is occupied by 3 or more people who do not form a single household and occupy the property as their only or main residence. There is also a requirement that rent is payable by at least one occupant of the property.

2.2 The table below shows an extract from the Town and Country Planning Use Classes Order for Wales, relating to the use classes which are relevant to this interim guidance note. For each use class the table provides a description of that use and any permitted change to another use.

A Guide to Use Classes Order in Wales - Classes C3, C4, C5, C6 and Sui Generis Town and Country Planning (Use Classes) Order 1987 (as amended)		
Use Class	**Description**	**Permitted Change**
Class C3 - Dwellinghouses, used as sole or main residences	Use as a dwellinghouse, as a sole or main residence and occupied for more than 183 days in a calendar year by - (a) a single person or by people to be regarded as for ming a single household, (b) not more than six residents living together as a single household where care is provided for residents, (c) not more than six residents living together as a single household where no care is provided to residents (other than a use within Class C4)	Permitted changes to Class C5 Permitted change to Class C6 Permitted change to a mixed-use combining use as a dwellinghouse within Class C3 with a use falling within Class C6 between the new use classes, C3, C5 and C6 Permitted change to a mixed-use combining use as a dwellinghouse within Class C5 with a use falling within Class C6 Development is not permitted if it would result in the use as two or more separate dwellinghouses falling within Class C3, Class C5 or Class C6 of any building previously used as a single dwellinghouse

A Guide to Use Classes Order in Wales - Classes C3, C4, C5, C6 and Sui Generis Town and Country Planning (Use Classes) Order 1987 (as amended)		
Use Class	Description	Permitted Change
Class C4 - House in multiple occupation	Use of a dwellinghouse by not more than six residents as a "house in multiple occupation" (HMO). Large HMOs (of more than six people) are unclassified and therefore sui generis	Permitted change to Class C3
Class C5 - Dwellinghouses, used otherwise than as sole or main residences	Use as a dwellinghouse, otherwise than a sole or main residence and occupied for 183 days or fewer by - (a) a single person or by people to be regarded as forming a single household, (b) not more than six residents living together as a single household where care is provided for residents , or (c) not more than six residents living together as a single household where no care is provided to residents (other than a use within class C4)	Permitted change to Class C3 Permitted change to Class C6 Permitted change to a mixed use combining use as a dwellinghouse within Class C5 with a use falling within Class C6 Permitted change to a mixed use combining use as a dwellinghouse within Class C3 with a use falling withing Class C6 Development is not permitted if it would result in the use as two or more separate dwellinghouses falling within Class C3, Class C5 or Class C6 of any building previously used as a single dwellinghouse
Class C6 - Short-term lets	Use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation	Permitted change to Class C3 Permitted change to Class C5 Permitted change to a mixed used combining use as a dwellinghouse within Class C3 with a use falling within Class C6 Permitted change to a mixed used combining use as a dwellinghouse within Class C5 with a use falling within Class C6

A Guide to Use Classes Order in Wales - Classes C3, C4, C5, C6 and Sui Generis Town and Country Planning (Use Classes) Order 1987 (as amended)		
Use Class	Description	Permitted Change
Class C6 - Short-term lets	Use of a dwellinghouse by not Use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation	Development is not permitted if it would result in the use as two or more separate dwellinghouses falling within Class C3, Class C5 or Class C6 of any building previously used as a single dwellinghouse
Sui generis - No class specified	Includes: (a) Includes large houses in multiple occupation (HMO) (more than six people sharing), (b) as a theatre, (c) as an amusement arcades or funfair, (d) as a launderette, (e) for the sale of fuel for motor vehicles, (f) for the sale or display for sale of motor vehicles, (g) for a taxi or vehicle hire business, (h) as a hostel, (i) as a scrap yard, (j) for any work registerable under the alkali, etc. Works Regulation Act 1906, as a waste disposal installation, (k) as a betting office	No permitted change, except - (a) motor vehicle sales to Class A1. (b) Permitted changes of use from use as a betting office to Class A1, mixed use for any purpose within Class A1 and as a single flat, Class A2; and mixed use for any purpose within Class A2 and as a single flat (c) Permitted changes of use from mixed use as a betting office and as a single flat to Class A1, mixed use for any purpose within Class A1 and as a single flat, Class A2, mixed use for any purpose within Class A2 and as a single flat; and use as a betting office

National

3.1 Whilst the current version of Planning Policy Wales (PPW) (Edition 12 February 2024) does not make specific reference to the development of HMOs, the Welsh Government have recognised that the over-development of HMOs in an area can have significant detrimental effects. Welsh Government carried out extensive research in 2015 entitled 'Houses in Multiple Occupation: Review and Evidence Gathering':

www.gov.wales/sites/default/files/publications/2018-11/houses-in-multiple-occupation-hmos-review-report-on-findings.pdf

3.2 This research focussed on areas with significant concentrations of students, but nevertheless acknowledged more generally that the concerns emanating from the number of HMOs in an area increase, once the concentration of such households exceeds a certain threshold (10%). The difficulty that arises from applying this to Flintshire is that only HMOs with 5 or more occupiers in building of 3 storeys or more, are subject to mandatory licensing. This is compounded by the fact that before 2016, the development of small HMOs was permitted development and as such did not require planning consent. Since Flintshire does not have an additional licensing scheme currently it is therefore not possible at present to accurately map where they are located.

3.3 Community and Business Protection has secured funding to develop and introduce an additional licensing scheme therefore the process of establishing a full licensing scheme is underway. This will apply to smaller HMOs than those covered by the Mandatory licensing described in para 3.2. Once this system is operational, it will enable the identification of areas of high concentrations of HMOs. At that point, this interim policy guidance note will be reviewed to consider implementing threshold controls on Houses in Multiple Occupation (HMOs). By way of an example, a system of threshold control will enable an assessment of how many HMOs exist within a 50-metre radius of any proposed new HMO. If the concentration of HMOs within that 50-metre radius reaches 10% or more, planning permission may be denied. However, until the evidence is available, this is a system based on a threshold % withi a defined area, cannot be introduced into this interim policy guidance note. Instead, the interim planning guidance note can provide useful advice and assistance regarding the application of HN7 to any new HMO applications.

3.4 In February 2018, the Cabinet Secretary for Energy, Planning and Rural Affairs wrote to all local authorities to remind them of the powers they have to manage HMOs (weblink below). The letter clearly emphasises that the management of HMOs is a local issue where LPAs should make informed decisions on what is best for their area and develop suitable and evidenced policy responses to help achieve this.

https://www.gov.wales/sites/default/files/publications/2018-11/local-authority-powers-houses-in-multiple-occupation.pdf

3.5 It is evident from the preceding paragraphs that the way in which HMOs are defined differs between planning and housing legislation. This Interim Planning Guidance Note seeks to focus on HMOs requiring planning permission in terms of applying the planning considerations within policy HN7 of the LDP. However, the introduction of an additional licensing scheme alongside the mandatory licensing scheme will contribute to an evidence base which will aid planning decisions.

Local

3.6 The Flintshire Local Development Plan (LDP) was adopted in January 2023 and sets out the main land use policy guidance for the County. This plan includes a number of relevant policies as set out in Appendix 2, but the main policy is:

HN7: Houses in Multiple Occupation

Within defined settlement boundaries, proposals to convert an existing building into self-contained accommodation, bedsits or houses in multiple occupation (HMO) will only be permitted if:

a. Conversion is possible without major alterations or extensions which would significantly alter the character and appearance of the building and locality;

b. The scale and intensity of use would be compatible with the existing building and adjoining and nearby uses;

c. The proposal includes on-site parking, or it can be demonstrated that it does not have an adverse effect on local parking provision;

d. The proposal includes a drying area, bin storage and cycle parking, and provides for the amenity of future occupants;

e. The cumulative impact of development would not adversely affect the character of the locality or residential amenity;

f. The proposed HMO does not result in either more than two HMOs side by side or an existing residential property sandwiched between HMOs.

3.7 The main planning issues to consider with proposals for HMOs are the suitability of the existing building, impact of the development on the character of the area with regard to the living conditions for neighbours, future occupiers, and parking provision, as well as considering the cumulative effects of HMO development. Each of the criteria in Policy HN7 is important to ensure that conversion to an HMO creates reasonable

accommodation for the future occupants and does not result in planning harm. The policy, and this interim policy guidance note, clearly focuses on the conversion of existing buildings to HMOs as this is the most likely form of development but is also applicable to a proposal for a new build HMO.

4. Detailed Guidance

a) Suitability of Building to Accommodate an HMO

4.1 Criterion a. of policy HN7 states 'Conversion is possible without major alterations or extensions which would significantly alter the character and appearance of the building and locality'. It aims to ensure that the existing building is suitable and appropriate to be successfully converted into an HMO. Where proposals to convert dwellings to HMOs include extensions and/or alterations or where extensions to existing HMOs are proposed, the works should conform with the requirements in policy HN5 House Extensions and Alterations i.e.

a. is subsidiary in siting, scale and form to the existing dwelling, and does not represent an overdevelopment of the site;

b. respects the existing dwelling and surroundings in terms of design and materials;

c. will not have an unacceptable impact on the living conditions of occupiers of adjoining developments.

4.2 Regard should also be had to the guidance in the Extensions and Alterations to Dwellings Supplementary Planning Guidance (SPG), particularly in respect of separation distances and daylight standards. The conversion of a building to an HMO should be possible without altering the character and appearance of both the building itself and the locality.

4.3 In addition to considering the suitability of a building in terms of its external character and appearance, it is also necessary to ensure that the building is internally able to provide a satisfactory standard of residential accommodation to comply with Houses in Multiple Occupation (HMO) Minimum Standards. This is a matter for the Council's Community and Business Protection department, and it would be beneficial for anyone proposing an HMO to seek guidance on the relevant standards before submitting a planning application. Adhering to the relevant standards will also assist in ensuring that the HMO will receive the appropriate HMO license. See Appendix 3 HMO Register and Licensing Requirements.

b) Scale and Intensity of development

4.4 Criterion b. of policy HN7, states 'The scale and intensity of use would be compatible with the existing building and adjoining and nearby uses'. Converting to an HMO will result in an increased intensity of use and it is vital that both future occupants and nearby residents have reasonable levels of living standards. For example, for occupants of some HMOs the bedroom provides their only private space and thus they are likely to spend more time in the bedroom than might be the case in a family home. As such, in those cases, a lack of reasonable outlook from the bedroom would create an oppressive environment for those residents.

4.5 In HMOs each bedsit should have at least one opening window with a reasonable outlook and prospect. Similarly, at least one opening window in communal habitable rooms should have a reasonable outlook. For new build proposals, the LPA considers that a reasonable outlook comprises a minimum distance of 12 metres between a main window in a habitable room and a blank wall (or a wall with a window of a non-habitable room). To ensure privacy there should be a minimum distance of 21 metres between a main window in a habitable room and another window in a habitable room.

4.6 It is recognised that these standards may not be achievable in some of the urban areas, particularly when the creation of a HMO involves the conversion of older housing stock. In these instances, the Council will consider the outlook and prospect of the accommodation as a whole, including both bedrooms and communal habitable rooms. The Council will also have regard to the previous use of rooms within conversion schemes and determine whether the proposal will result in any greater harm.Each case will be assessed on its merits and must consider the living conditions of both the occupants of the proposed HMO and the occupants of adjoining houses and other land uses.

Basement Accommodation

4.7 Proposals for basements to be used as HMOs, in areas at risk of flooding, will resisted in accordance with the updated guidance in Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion. Applications must be accompanied by a Flood Consequences Assessment and consultation will be undertaken with NRW to establish whether the risks of flooding can be satisfactorily managed. Flood risk considerations will apply to all HMO proposals in areas at risk of flooding and not just basements, given the intensification of residential use. Planning permission will only be granted where there is no known flood risk, or where flood risk has been managed to the satisfaction of both Natural Resources Wales (NRW) and the Council. In most cases basements are unlikely to be considered acceptable for conversion to HMO accommodation.

4.8 When considering whether there is a reasonable outlook from a window in a habitable room in a basement the Council will consider the function of the space to which it looks onto. For example, it would not be considered appropriate if the window looks directly onto a bin storage area or an area for parking or directly onto the public highway or footway. Basements can be used for storage, laundry rooms, bicycles or other uses.

c. Access and parking

4.9 Criterion c. of Policy HN7 states ''the proposal includes on-site parking or it can be demonstrated that it does not have an adverse effect on local parking provision'. Often HMOs occur in areas of high-density housing where there is only a limited provision of on-street parking. The policy aims to ensure that the increased demand for parking does not impact on local parking provision and highway safety in the surrounding area. Residents of HMOs may not own a car and so it is important that HMOs are located in sustainable areas that have good access to facilities and services using a variety of means of travel including walking, cycling and public transport.

4.10 The Applicant will need to carefully consider how many car parking spaces are required by the development and provide a plan of the site showing the layout of the spaces as part of any planning application. The explanation to policy HN7 references a car parking standard of 0.4 spaces per bedsit. This standard is based on Residential Car Parking Research carried out by the Department of Communities and Local Government in 2007 and has been referenced by Planning Inspectors in recent appeal decisions. Off-street parking is advised as this will assist in controlling the effects that the development of HMOs can have on on-street parking, particularly in dense urban residential areas such as terraced streets, where existing residents rely on this form of parking with no reasonable alternatives available.

4.11 Applicants must clearly explain how the parking requirements of their proposed HMO can be reasonably accommodated without detriment to the existing circumstances in the local area. Most HMOs are created by residential conversions so it is important to take into consideration whether the HMO use would bring any harmful detriment when compared with the parking likely to be generated by the existing residential use, or what parking would be required by the parking standards SPG. For example, a 4 bed house would generate a parking requirement of 3 spaces but the conversion of the house to a 6 bed HMO would result in a parking requirement of 2.4 spaces, so there is no overall detriment in terms of parking. Any proposal which provides either no parking or reduced levels of parking must be accompanied by a sustainability statement explaining why this is justified having regard to the nature of the HMO, the availability of local services and facilities and means of travel by walking, cycling and public transport.

4.12 The provision of on-site car parking areas can harm the character and appearance of heritage assets, particularly where they are at the front of buildings or involve the removal of traditional boundary walls and features. In all cases car parking should be sensitively designed and respect the character and appearance of an area whilst providing for safe vehicular parking and vehicular movements.

d. On-site Facilities and Outdoor Amenity Space

4.13 Criteria d. of policy HN7 states 'the proposal includes a drying area, bin storage and cycle parking, and provides for the amenity of future occupants' and seeks to ensure that HMOs have adequate provision for these essential domestic requirements. It is important that residents have access to an area of private outdoor amenity space. This is usually provided as a communal area that is available for all residents of the HMO to use. This space is intended to provide an area for residents not just for drying clothes but for informal recreation/socialising.

4.14 The table below sets out the minimum requirement for amenity space for Houses in Multiple Occupation. These standards reflect that bedsits are almost always occupied by a single person and rarely will children live in them. Nevertheless, the standards below will help ensure that occupiers of an HMO building will have sufficient private outdoor space.

Table 4: Planning Policy HMO Minimum Amenity Space Requirements

Size of HMO proposal	Amenity Space standard
3 bedsits	Minimum of 20m2
Each additional bedsit above three	+10m2 per bedsit

4.15 The amenity space must be accessible to all residents and be well designed and laid out and suitable to meet the needs of the occupants. The standard can be met either by provision of a communal area (such as a rear garden), a private space or a combination of these. Any amenity space would need to be carefully assessed against the effects on the living standards of adjoining occupiers in terms of overlooking and loss of privacy. Areas to the front of a building that are not private and areas intended for parking and bin stores should not be included in the calculation. Long narrow spaces should not be included in a calculation of available amenity space as they are not considered to provide useable space.

4.16 Justification will be required by applicants if lower than standard provision of amenity space is proposed and this will only be acceptable subject to the two following criteria:

- The proposal is within easy walking distance to a local centre, where the benefits of being close to community facilities (such as green spaces, open spaces, or recreational facilities) and public transport are significant;
- The re-use of an otherwise vacant building has wider significant community or regeneration benefits.

4.17 Applicants must take all opportunities to maximise amenity space within the proposals. This may include for example the removal of existing extensions and outbuildings. Extensions to properties to increase accommodation will not be permitted if this would result in an inadequate amount of amenity space.

Bin Stores

4.18 A suitable space for refuse and recycling bins must be provided, for all of the occupants of the building. Bins should be located in a bin compound or in a location easily accessible to the kerbside. Where possible, the bin store should be to the side or rear of the property out of public view and where it will not be a nuisance. Where it is necessary for bins to be stored at the front of the property, the bin store should be designed to fit in with the street scene. Bin stores should not create dark recessed areas which could encourage misuse, vandalism or pest control problems. Where a development affects a heritage asset, the bin store should, where possible, be out of sight from the road. Facilities for waste and recycling storage should be clearly marked on the plans and may be controlled by planning condition to ensure that they remain in-situ in perpetuity. Applicants are encouraged to consult with Streetscene to establish the waste and recycling storage /collection requirements relative to the size of the proposed HMO.

4.19 The Applicant must also include secure cycle parking facilities within the site. This is especially important due to the low levels of car ownership associated with HMOs. Unless the developer demonstrates to the Council's satisfaction that this is not possible, one secure cycle parking space should be provided for every HMO bedroom, bedsit unit or self-contained flat within the building. Details should be provided as part of any planning application and may be controlled by planning condition to ensure that they remain in-site in perpetuity.

e. and f. Reducing the impact on the character of the locality and residential amenity.

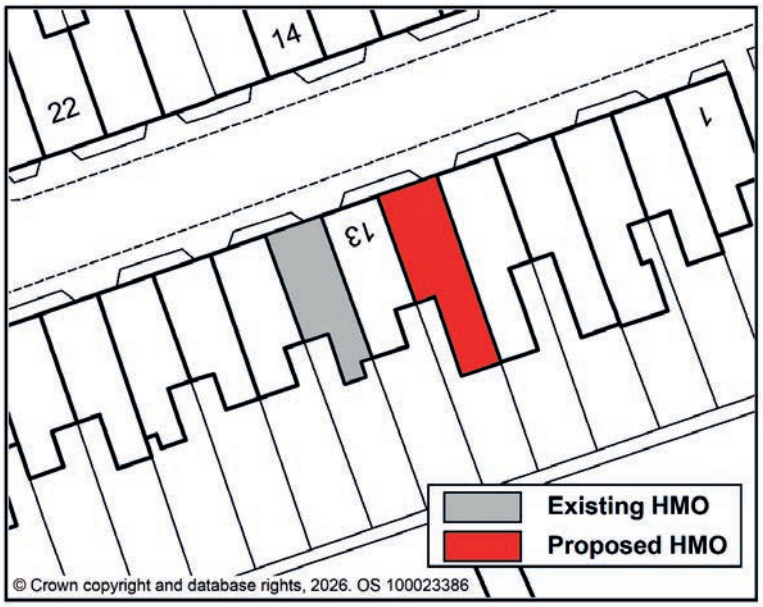
4.20 Permitting the conversion of a building into an HMO can help bring back into viable use an otherwise vacant property. However, it can also have the potential to cause a nuisance to existing neighbouring residents. Additionally, an over proliferation of HMOs

in a local area can have a negative impact on residential amenity and change the character of an area for the worse.

4.21 Criterion e. of policy HN7 states, 'the cumulative impact of development would not adversely affect the character of the locality or residential amenity.' and aims to address the detrimental impact that can result when several HMOs are located close together, and an additional HMO is proposed. Criterion f. states 'The proposed HMO does not result in either more than two HMOs side by side or an existing residential property sandwiched between HMOs.' and seeks to provide more specific and practical guidance on the location of proposed HMOs. The conversion of a property into an HMO has the potential to adversely impact on its immediate neighbours and the character of an area and these impacts will increase cumulatively with each successive proposed HMO. The following examples in the form of illustrations are intended to provide practical and common-sense ways of reducing the potential harm on existing properties/neighbours within close proximity to a proposed HMO. The present lack of a full HMO licensing system means that it is not known where all HMOs are located, however, this evidence base will improve over time. Determination of a planning application will be assisted by the applicant providing information on the number and location of HMOs in the vicinity of the application site and a statement as to how they consider the proposed HMO will comply with the requirements of Policy HN9 and this Interim Guidance Note. The case officer will still need to assess such information against known data sources and a visit to the building and surroundings to assess whether the proposed HMO is policy compliant.

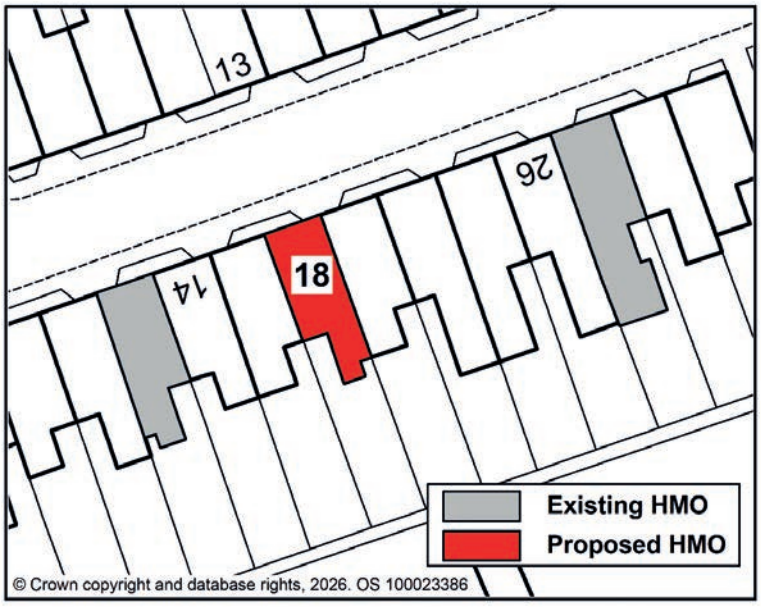
4.22 The Council will not permit the following when considering applications for conversions to HMOs:

a). A non-HMO property will not be allowed to be 'sandwiched' between two HMOs.

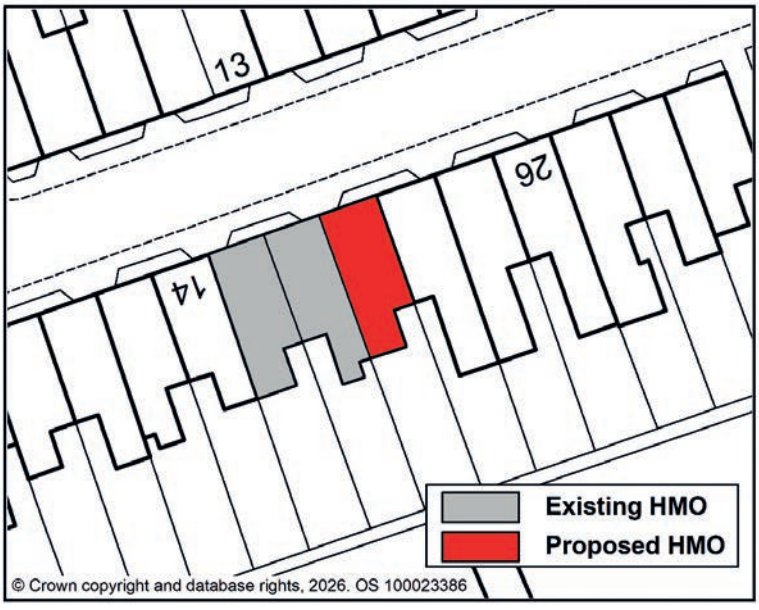


4.23 In the example above, the proposed HMO at number 11 would result in a neighbouring non-HMO property, no 13, being sandwiched between two HMOs. **This would not be acceptable.**

4.24 However, in the example below the proposed HMO (at number 18) would not result in a non-HMO property being sandwiched between two HMOs. The two non-HMO properties would only have an HMO on one side, not both sides. **This would be acceptable in principle.**



b). Adjoining HMO's



4.25 In the example above the proposed HMO would result in a row of three HMOs. **This would not be acceptable.**

4.26 These restrictions apply to all house types, including terraced, semi-detached and detached properties. These restrictions will not apply if the properties (including the curtilage) are separated by a road (minimum of 5.5m) suitable for vehicles or an area of undeveloped land (that is at least 5.5 wide).

Protected Species and Biodiversity Compliance

4.27 All HMO development proposals, must ensure full compliance with relevant wildlife protection legislation. This includes, but is not limited to, the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017.

The Council will expect all proposals to demonstrate due regard to biodiversity conservation in line with national and local policy objectives.

Water Quality and Phosphates Compliance

4.28 Some areas of Flintshire fall within the River Dee and Bala Lake Special Area of Conservation (SAC) catchments, where nutrient enrichment, particularly from phosphates, poses a risk to water quality and ecological integrity. The Council therefore must ensure that development proposals do not adversely affect the integrity of these protected sites.

4.29 In accordance with LDP Policy EN15 (Water Resources) and the wider requirements of the Habitats Regulations, proposals for HMOs must demonstrate that adequate foul drainage arrangements are in place and that no deterioration in water quality will result. Where relevant, applicants may be required to submit information on wastewater treatment, connection to mains drainage, or mitigation measures to ensure phosphate neutrality. The Council will continue to work with NRW and Dŵr Cymru Welsh Water to ensure that the potential impacts on designated sites are fully considered.

Appendix 1
Useful Contacts and Links

For Planning Development Management **(01352 703331)**

Web: www.flintshire.gov.uk/planning
Email: planningadmin@flintshire.gov.uk

For Planning Policy **(01352 703213)**
Web: www.flintshire.gov.uk/planningpolicy
Email: developmentplans@flintshire.gov.uk

For Heritage and design issues **(01352 703218/ 703297)**
Web: www.flintshire.gov.uk/conservation
Email: conservation@flintshire.gov.uk

For Building Control **(01352 703417)**
Web: www.flintshire.gov.uk/buildingcontrol
Email: bcadmin@flintshire.gov.uk

For Highways Development Control **(01352 704617)**
Web: www.flintshire.gov.uk/highwaysdc
Email: highwaysdc@flintshire.gov.uk

For Community and Business Protection **(01352 703440)**

Housing and Pollution Control
Web: www.flintshire.gov.uk/houseinmultipleoccupationlicense
Email: housingenforcement@flintshire.gov.uk

The postal address for all of the above is:
Flintshire County Council, Ty Dewi Sant, St Davids Park, Ewloe, CH5 3FF

For Housing Strategy either **01352 703721** or **01352 702121** and ask for Housing Strategy. Postal address, Flintshire County Council, Chapel Street Flint, Flintshire, CH6 5BD.

Procedures

Pre-application advice

This SPG has demonstrated that this type of development involves a number of issues that will need to be addressed before submitting a planning application. An applicant is therefore strongly encouraged to use the Council's pre-application advice service. Information about the service, what information is needed and what fees are charged for pre-application advice can be found at

www.flintshire.gov.uk/en/Resident/Planning/Pre-application-Planning-Advice.aspx

Appendix 2
Flintshire Local Development Plan Policies

HN7: Houses in Multiple Occupation

Within defined settlement boundaries, proposals to convert an existing building into self-contained accommodation, bedsits or houses in multiple occupation (HMO) will only be permitted if:

a. Conversion is possible without major alterations or extensions which would significantly alter the character and appearance of the building and locality;

b. The scale and intensity of use would be compatible with the existing building and adjoining and nearby uses;

c. The proposal includes on-site parking or it can be demonstrated that it does not have an adverse effect on local parking provision;

d. The proposal includes a drying area, bin storage and cycle parking, and provides for the amenity of future occupants;

e. The cumulative impact of development would not adversely affect the character of the locality or residential amenity'.

f. The proposed HMO does not result in either more than two HMOs side by side or an existing residential property sandwiched between HMOs.

This policy adds greater detail to Strategic policies STR6 Services Facilities and Infrastructure, and STR11 Provision of Sustainable Housing Sites. With recent legislative changes relating to HMO's the County has seen a significant increase in the number of planning applications for HMO's. A HMO is a dwelling or other building which is converted into letting rooms which are occupied by 3 or more unrelated persons who share facilities such as kitchen and bathroom.

The Local Housing Market Assessment identified a need for accommodation for smaller households across the County. Where this includes the conversion of an existing property the preference will be for the conversion of properties into self-contained accommodation. However it is recognised that HMOs can form an important part of the housing stock and meet particular housing needs. That said, HMOs are a more intensive form of accommodation which can have impacts on a building, locality and community. This is particularly the case where certain areas of the County are seeing a growing number of properties converted to HMOs and this can give rise to cumulative impacts. Too many flats / HMOs in one area can alter the character of established residential areas, resulting in an impact on community cohesion and residential amenity. For example large numbers of flats or HMOs can lead to problems such as a shortage of on street parking and bin storage issues. Applicants should therefore calculate the requirement for off street car parking using the figure of 0.4 car parking spaces per unit. This figure is based on

Appendix 2
Flintshire Local Development Plan Policies

Residential Car Parking Research carried out by the Department of Communities and Local Government in 2007 and is used by Inspectors when considering appeals. Also such areas are often associated with low levels of owner occupation which in some instances can lead to lower standards of property maintenance and associated environmental degradation issues. Furthermore, the cumulative impact of flats/HMOs can have a detrimental impact on creating mixed and balanced communities by reducing the number of family homes available within an area.

In the case of business premises it must be established that the building is no longer required for employment purposes and Policy PE6 provides further guidance on this. In line with national planning guidance the conversion of upper floors above retail and commercial properties can add to the vitality and viability of town centres but in the case of ground floor premises within Primary Shopping Areas, proposals will need to be assessed against Policy PE8. A buildin should be capable of being converted into a HMO without the need for alterations or extension which would lead to the over intensification of the use or harm the character and appearance of the building and locality.

The policy therefore seeks to ensure that proposals for HMOs are assessed as to their appropriateness. The building itself must be suitable for conversion without extensions or alterations that would change its character and appearance. The scale and intensity of the proposal relative to the building itself and the locality needs to be compatible and not give rise to harmful impacts. Proposals should ideally have on-site car parking or where this is not possible, the proposal should demonstrate that there would be no adverse impact on local parking provision. Consideration should be given by the applicants to the sustainability of the location in terms of availability and proximity to public transport and public off street parking. Proposals should make on-site provision for clothes drying area, bin storage and cycle parking as well as appropriate amenity space for residents. Further detail is set out in a Supplementary Planning Guidance Note.

STR4: Principles of Sustainable Development, Design and Placemaking

To promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable placemaking design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change.

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Flintshire Local Development Plan Policies

To achieve this, all development should:

i. Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;

ii. Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;

iii. Be accessible and connected, allowing ease of movement;

iv. Make the best use of land, materials and resources;

v. Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision in residential contexts;

vi. Incorporate new, and connect to existing green infrastructure, promoting biodiversity;

vii. Incorporate where possible on-site energy efficiency and renewable energy generation;

viii. Ensure there is capacity and availability of infrastructure to serve new development;

ix. Manage water and waste sustainably;

x. Ensure that it supports and sustains the long term well being of the Welsh language

PC2: General Requirements for Development

All development should:

a. Harmonise with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape;

b. Not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution;

c. Take account of personal and community safety and security in its design and layout;

Appendix 2
Flintshire Local Development Plan Policies

d. Maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles;

e. Not have an unacceptable effect on the highway network or highway safety as a result of problems arising from traffic generation, inadequate and poorly located parking spaces, servicing and maneuvering;

f. Not result in or be susceptible to problems related to foul and surface water drainage, land stability, contamination, flooding, or pollution of light, air and water, either on or off site.

PC3: Design

All new development should:

a. Be of a high quality, distinctive and inclusive design which respects and enhances the site and its surroundings in terms of its siting, layout, scale, height, design, density, use of materials and landscaping, and creates a sense of place;

b. Retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity and ecological connectivity;

c. Ensure that new materials are appropriate, durable and sympathetic to the character and context of the site;

d. Protect and enhance the townscape, architectural, historic and cultural built environment;

e. Incorporate suitable provision of space about dwellings, amenity space, landscaping and planting;

f. Create attractive, accessible and safe and healthy places with natural surveillance, visibility and sensitive lighting;

g. Incorporate Sustainable Urban Drainage Schemes to bring about multiple benefits as an integral part of the development;

h. Protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/noise.

Appendix 3
HMO Register and Licensing Requirements

In addition to requiring planning permission, most HMOs will also need a separate licence from Community and Business Protection, Housing and Pollution Control team. Licensed HMOs are subject to conditions that require landlords to take all reasonable steps for the satisfactory management and maintenance of good physical standards of HMOs. These include mandatory conditions requiring certificated inspections for gas, electrical and fire safety, as well as specifying maximum occupancy numbers. There are also conditions requiring the licence holder to prevent anti-social behaviour. Breaching licence conditions can ultimately result in landlords being prosecuted and their licence being revoked. Licensing requirements are entirely separate to the requirement for planning permission, and it is made explicitly clear in national planning policy that the planning system must not duplicate the controls of other regulations in making decisions on planning applications.

Link to FCC Houses in Multiple Occupation (HMO) Minimum Standards

www.flintshire.gov.uk/en/Resident/Housing/Housing-Policies-and-Procedures/Houses-in-Multiple-Occupation-HMO.aspx

Appendix 4

Impacts of Interim Guidance Note on Welsh Language

The Flintshire Local Development Plan (LDP) was adopted on 24/01/23. The adopted LDP now represents the statutory

Local Development Plan for the County and should be read alongside Future Wales:

The National Plan. The LDP has been prepared in the context of Planning Policy

Wales and Development Plans Manual 3. The Plan covers the 15 year period ending on 31/03/30.

An Integrated Impact Assessment was a key part of the Plans preparation and was published at key stages including Preferred Strategy stage in 2017 Deposit in 2019 for the plans Examination in Public and in January 2023 when the plan was adopted. All the policies in the plan were assessed and impacts on the Welsh Language were considered.

See this link to the IIA 2023:-

www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Final-Sustainability-Appraisal-Report.pdf

The IIA evidences that policy HN7 would have a positive rather harmful effect on the Welsh Language.

As part of the Deposit LDP a consultant was employed to carry out further work to consider the Welsh Language in Flintshire. Subsequently the Background Paper No 12 Welsh Language, was produced which addressed the issues and carefully considered the implications of the LDP policies on the Welsh language. The consultant's report is included in the background a paper.

www.gov.wales/sites/default/files/publications/2018-11/local-authority-powers-houses-in-multiple-occupation.pdf

This demonstrates how, as the plan progressed, the Welsh Language was considered.

There have also been several opportunities for people to comment on the issue at each engagement and consultation stage as the Plan has progressed.

The issue of Welsh Language was not referenced in the Inspectors' Report as being a key issue.

The Council has set out in the LDP an intention to prepare a series of Planning Guidance Notes

The interim planning guidance note does not set out new policy but expands upon

Appendix 4
Impacts of Interim Guidance Note on Welsh Language

and gives guidance on policy HN7 in the LDP and as explained above, the impact of those policies on the Welsh Language has already been considered and examined, and the Plan found to be sound. Consultation being carried out at the present time therefore only relates to the additional clarification and guidance in the interim planning guidance note and should not bring about any additional implications for the Welsh Language.

Houses in Multiple Occupation

The interim document provides guidance on the assessment of planning applications for HMOs. It aims to support consistent decision-making while helping to manage the impact of HMOs on local communities.

Impacts on the Welsh Language

HMO development can bring about positive and negative effects as set out below:

Positive Impacts

The regulation of HMOs can help to preserve the character of communities, including Welsh speaking ones, by preventing an over concentration of one type of housing and promoting balanced demographics.

HMO development can provide lower-cost housing options, particularly for single people or young adults. This allows local Welsh speakers to remain in their communities, reducing the need to relocate for housing.

Negative Impacts

In areas with high percentages of Welsh speakers, a high number of HMO developments may disrupt language continuity. However, most HMO development within Flintshire tends to occur in larger settlements and urban areas such as Buckley, Shotton and Connah's Quay,and these are areas with low levels of Welsh speaking. Additional HMOs would therefore be unlikely to be harmful to the Welsh Language.

Neutral Impacts

The guidance primarily deals with planning and housing regulation, careful implementation and supporting SPG should ensure that new HMO development has neutral effects.

Representor	Comments	Change Sought	Response	Recommended Changes
Brynford Community Council	The Community Council has no objections to the draft HMO guidance note.	None	Noted	None
Hope Community Council	The Community Council objects to the proposed standard of 0.4 parking spaces per bedsit. It underestimates actual car usage, particularly in areas with limited public transport, and risks causing overflow parking on nearby streets, leading to congestion, safety issues, and restricted access for emergency and service vehicles. The Community Council urges a revision to better reflect real-world parking needs.	Increase in the minimum parking standard for HMOs, the proposed rate of 0.4 spaces per bedsit is too low and should be revised to reflect realistic parking demand and prevent negative impacts on surrounding streets.	Not accepted. The current standard of 0.4 spaces per bedsit has been in use for some time and represents the most reliable evidence available on parking needs for HMOs. This figure has also been accepted by Planning Inspectors in several appeal decisions, giving it established weight as a material planning consideration. It is also important to note that Policy HN7 is applied to proposed HMO development within settlement boundaries, which are therefore likely to be sustainable locations with access to public transport and local services. In this context, the 0.4 spaces per bedsit rate is seen as appropriate. Furthermore, paragraph 8.30 of the supporting text to Policy HN7 already	No change

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Comments and Responses to updated Interim Guidance Note

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Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			refers to this parking standard, so it would not be appropriate to revisit it through this guidance note. The Interim planning guidance note cannot change the policies within the LDP, the purpose of the interim planning guidance is to provide more detailed guidance on those policies and not to introduce any changes to the existing policy wording. Each HMO application will still need to demonstrate that it is in a sustainable location and will not cause highway safety issues. An important consideration is comparing the parking demand associated with a HMO compared to the parking demand arising from the continued existing use of a building. The Council's Highways and Development Management Officers will assess each proposal on its individual merits to make sure parking and access are suitable.	

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Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Holywell Town Council	The Town Council suggests a waste management agreement should be in place with private landlords to regulate recycling and address fly tipping issues. Replacing the individual collections required under the existing procedure. Para 4.18 Bin Stores. They state HMOs would not suit a High Street environment due to parking regulations and conservation requirements and that heritage and tourism should also be considered where appropriate.	Replace Council bin collections with waste management agreements. Avoid giving permissions to proposed HMO development on High Streets, ensure heritage and tourism are given closer consideration.	Not accepted. The focus of the interim guidance note is to ensure that a HMO conversion should include enough conveniently located space for storing waste and recycling bins in a tidy and practical way. The Council has a dedicated webpage here www.flintshire.gov.uk/en/Resident/Bins-Recycling-and-Waste/Landlords-Waste-Information.aspx relating to waste information for landlords and letting agents which indicates that waste is presently collected from rental properties by the Council. In this context, it would not be appropriate for the interim guidance note to introduce the need for private waste management agreements or arrangements. The Interim Guidance Note seeks to focus on planning matters. High Street locations are among the most sustainable places in the	No change.

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			County, with good access to shops, community facilities, services, and public transport. There is often unused space above shops or commercial premises where allowing appropriate residential use can help make town centres more vibrant and support local regeneration. Each proposal would need to be assessed on its individual merits against the suite of LDP policies, including HN7 and this interim guidance note. Where a proposal involves a listed building or a building within a conservation area, any potential impact on the historic environment would be carefully assessed by the Council's Conservation Officer to make sure heritage assets are properly protected.	
Hawarden, Broughton and Bretton Community Councils	The Council raises concerns about the proposed 10% threshold for HMOs in an area, viewing it as too high and potentially harmful	**1. Revising HMO Density Thresholds** Reduce the current 10% threshold for HMOs in any area.	**1. Partly accepted.** The document explains that it is interim guidance until such time as the evidence of the location of HMOs is	That the following changes are made to para 3.3 for clarification: • That the beginning of the 4th sentence is amended to read **'By way**

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	to community cohesion, particularly in higher-density neighbourhoods. They call for a lower limit and clearer guidance on how flats are factored in, to avoid over-concentration. They also suggest redefining the "area" from a 50-metre radius to 200 metres to better reflect local context. Further recommendations include requiring at least three non-HMO properties between HMOs, stricter limits in small streets (e.g. only one HMO in a cul-de-sac of six homes), capping occupancy at four people per HMO, and ensuring proper local oversight and management. The Council also emphasises the need to protect older buildings, prevent harm to property values, and require developer investment in local services. They stress that the interim policy must not exceed limits expected in the final guidance.	**2. Expanding the Assessment Radius** Increase the current 50-metre radius used to measure HMO concentrations to 200 metres. **3. Increase Separation Between HMOs** Introduce a rule that there must be at least three non-HMO houses between HMOs. **4. Restricting HMOs on Smaller Streets** Only allow one HMO on small streets or cul-de-sacs. **5. Setting Occupancy Limits** Limit HMOs to a maximum of four occupants. **6. Improving Management and Monitoring** Require better local management and monitoring of HMOs. **7. Protecting Heritage and Character Buildings** Do not allow HMO conversions that would harm older or historic buildings.	available to identify concentrations and to allow an assessment of an approach based on % thresholds and radius. For context, the interim guidance note explains that a 10% threshold is based on Welsh Government research, which provides an evidence-based and tested standard. This figure has been applied in other areas and accepted by Planning Inspectors, ensuring consistency and fairness in decision-making. In order to provided further clarity it is recommended that para 3.3 is amended to make it clear that the % threshold / radius approach is not yet in place. **2. Not accepted** As above, it is stressed that the reference to a radius is an example and does not presently form part of policy HN7 nor the interim planning guidance note. The	**of example,** a system of threshold control will.....' That the 6th sentence be amended to read 'However, **until the evidence is available, this a system based on a threshold % within a defined area,** ~~is fully functional~~, **cannot be introduced into** this interim policy guidance note. Instead, the interim planning guidance note can provide useful advice and assistance regarding the **application of HN7 to** any new HMO applications.

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		8. Managing Community and Market Impacts Recognise that high HMO levels can lower property values and discourage long-term residents. Include controls to reduce these impacts. **9. Require Developer Contributions** Make developers contribute to local services and infrastructure (such as waste collection, parking, or community safety) where HMO developments increase local demand. **10. Aligning Interim and Final Policy Approaches** Make sure the Interim Guidance does not go further than what is expected in the final HMO policy.	appropriateness of a % threshold and radius can only be assessed once evidence relating to the location of HMOs is available. Expanding the area to 200 metres would appear to make it harder to resist new HMO proposals, as there would be more baseline properties to measure the number of HMOs against. This could make existing concentrations appear smaller. Further consideration will be given, once evidence is available, as to the most appropriate % threshold and radius with which to effectively manage local impacts. **3. Not accepted** This requirement would not be consistent with criterion (f) of the existing policy and would be more restrictive than the policy wording. The interim guidance note must align with adopted policy to remain defensible and proportionate.	

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			4. Not accepted This issue will be reviewed once data from Public Protection is available. The Council intends to revisit the interim guidance when more detailed information on HMO concentrations and impacts is available. **5.Not accepted** A local occupancy cap, restricting all HMOs to no more than 4 occupants, cannot be imposed, as national legislation and planning guidance permit larger HMOs. The key planning consideration is that each proposed HMO is considered on its individual merits against policies in the LDP and this guidance note. **6. Not accepted** Management and monitoring are primarily controlled through Public Protection and Housing licensing, rather than through the planning system. However, planning conditions can sometimes be used to establish good management practices where necessary and appropriate.	

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Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			7. Not accepted / Noted Proposals affecting listed buildings or buildings within conservation areas are assessed by the Council's Conservation Officer. The impact on heritage assets is already a key consideration in determining any HMO planning application. **8. Not accepted** Property values are not a material planning consideration. Planning decisions must focus on issues such as design, living conditions, parking, and the character of the area, rather than potential changes to property prices. **9. Not accepted** Planning obligations (developer contributions) can only be required where there is clear evidence of harm to local infrastructure, and any contribution must be directly related to and proportionate to that impact. The interim guidance is written to ensure that HMO	

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			developments do not create such harm in the first place. 10. Not accepted The document is clearly identified as interim guidance, based directly on the adopted policy HN7 criteria. Once sufficient evidence on HMO concentrations is available, the guidance will be reviewed. It would be inappropriate to introduce new limits at this stage without the necessary supporting data.	
NRW	NRW support the reference to TAN 15 on flood risk but advise and recommend clarifying that residential development should avoid ground-floor accommodation as well as basements, in line with TAN 15's guidance on highly vulnerable development. NRW also suggests expanding the reference to include Risk Management Authorities. They note the SPG does not currently address protected species and	There should be a clearer reference to TAN 15 with its full title and explicit guidance that residential development should avoid ground-floor accommodation due to flood risk. There should be reference to Risk Management Authorities along with 'The Council' in para 4.22, the addition of requirements to address protected species in line with wildlife legislation, and consideration of the impact of foul	Accepted. Strengthening references to TAN 15, Risk Management Authorities, protected species legislation, and water quality within SACs would improve clarity and ensure the guidance aligns with existing national policy and environmental duties. It would not be appropriate to add 'Risk Management Authorities' to Para 4.22 as this paragraph (and	**Change wording in para 4.7 to**: Proposals for basements to be used as HMOs, in areas at risk of flooding, will be ~~carefully assessed against the level and type of flood risk and must satisfy~~ **resisted in accordance with the updated guidance in TAN15 Technical Advice Note ~~(TAN) 15~~: Development, Flooding and Coastal Erosion**. After paragraph 4.26 insert a new heading and

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	emphasize that all developments must comply with relevant legislation, including the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Furthermore, NRW highlights that parts of Flintshire lie within the River Dee and Bala Lake Special Area of Conservation (SAC) catchments, and under the Habitats Regulations, planning authorities must consider impacts on water quality from foul drainage. NRW advises that these considerations be incorporated into the SPG.	drainage on water quality within Special Areas of Conservation.	subsequent paragraphs) is concerned with the location of HMO's relative to existing HMOs and does not reference flood risk.	paragraph: **Protected Species and Biodiversity Compliance** **All HMO development proposals, must ensure full compliance with relevant wildlife protection legislation. This includes, but is not limited to, the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017.** **The Council will expect all proposals to demonstrate due regard to biodiversity conservation in line with national and local policy objectives.** After paragraph 4.26 insert a new heading and paragraph: **Water Quality and Phosphates Compliance** **Some areas of Flintshire fall within the River Dee and Bala Lake Special Area of Conservation (SAC) catchments, where nutrient enrichment, particularly from phosphates, poses a risk to water quality**

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				and ecological integrity. The Council therefore must ensure that development proposals do not adversely affect the integrity of these protected sites. In accordance with LDP Policy EN15 (Water Resources) and the wider requirements of the Habitats Regulations, proposals for HMOs must demonstrate that adequate foul drainage arrangements are in place and that no deterioration in water quality will result. Where relevant, applicants may be required to submit information on wastewater treatment, connection to mains drainage, or mitigation measures to ensure phosphate neutrality. The Council will continue to work with NRW and Dŵr Cymru Welsh Water to ensure that the potential impacts on designated sites are fully considered.

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Saltney Town Council	The Town Council states there is poor property management waste and recycling issues over populating communities.	None specified	These matters have been raised in other comments and addressed in responses.	No change
Shotton Community Council	Shotton Community Council The Council recognises that Houses in Multiple Occupation (HMOs) provide valuable and flexible housing options but is concerned about their rapid growth in Shotton, particularly in densely populated streets where parking and waste issues already exist. It supports the Draft Interim Guidance Note and measures to manage HMO development through minimum living standards, appropriate waste arrangements, and improved parking considerations. To maintain neighbourhood balance and character, the Council also supports limits on HMO clustering and local concentration thresholds.	**1. Role and Context of HMOs** The Council recognises that HMOs provide important and flexible housing options but has serious concerns about their rapid growth in Shotton, particularly in densely populated terraced streets already experiencing parking and waste management challenges. **2. Support for the Draft Interim Guidance Note** The Council supports the Draft Interim Guidance Note and its proposed measures to manage and limit further HMO development in appropriate areas. **3. Minimum Standards and Living Conditions** The Council fully backs the introduction of minimum standards for room sizes, shared facilities, outlook,	**1. Noted / Not accepted.** Welcomes the recognition that HMO's have a role to play in meeting the need for small and flexible housing units and acknowledge the need for proposals to be carefully assessed. These points have been highlighted in previous comments, waste collection arrangements are beyond the remit of planning but when considering a HMO conversion proposal, there must be sufficient space which is conveniently located for waste storage. Policy HN7 regarding HMO development applies to locations within settlement boundaries and so in sustainable locations where there is access to public transport, encouraging less reliance on private car usage.	No change

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Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		and privacy to ensure acceptable and consistent living conditions for all occupants. **4. Waste Management and Larger HMOs** The Council believes that larger HMOs (accommodating six or more residents) should have their waste treated as business waste, reflecting the greater volume generated and the associated pressure on local waste services. **5. Parking and Highway Impacts** Parking remains a major concern. The Council considers that current guidance underestimates actual car ownership and use levels among HMO residents, particularly on streets with limited off-road parking capacity. **6. Limiting Clusters and Density Thresholds** The Council supports restricting the clustering of HMOs by limiting them to no more than two adjoining properties and preventing residential	**2. Noted / Not accepted** The objective of policy HN7 and the supporting interim guidance note is not to 'limit' further HMO development, but to ensure that the land use planning considerations of each proposal are properly assessed in a consistent manner against Policy HN7 and this guidance document. **3. Noted / Not accepted** References to minimum standards for room sizes are not included in the document as these are a matter for licensing rather than planning. This is explained in para 4.3 of the guidance note which states that 'In addition to considering the suitability of a building in terms of its external character and appearance, it is also necessary to ensure that the building is internally able to provide a satisfactory standard of residential accommodation to comply with Houses in Multiple Occupation (HMO)	

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		dwellings from being located between two HMOs. It also supports introducing a 10% concentration threshold within a 50-metre radius to protect Shotton's neighbourhood character and maintain a balanced housing mix.	Minimum Standards. This is a matter for the Council's Community and Business Protection department'. **4. Not accepted.** This is covered in the response to Holywell Town Council. **5. Not accepted.** This is covered in the response to Hope Community Council. **6. Noted.** However, the interim guidance note does not yet introduce a % threshold nor radius approach as this cannot be done until evidence of HMO locations is available. See response to Hawarden, Broughton and Bretton Community Council above.	
Cllr S Bibby (Shotton West), Cllr D Evans (Shotton East and Higher) and Cllr R Davies (Shotton East and Higher)	We wish to provide our perspective on the ongoing development of Houses in Multiple Occupation (HMOs) and their impact on the community of	We recognise that waste management remains a serious issue in areas with a high concentration of HMOs. While we support the policy outlined in the Draft Interim Guidance	**1. Not Accepted.** The focus of the interim guidance note is to ensure that any HMO conversion should include enough conveniently located space for storing waste	No Change.

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	Shotton. While HMOs can serve an important role in offering flexible accommodation options, particularly for single individuals, students, and temporary workers, there are significant concerns regarding their proliferation in certain areas of the town. A substantial number of HMO conversion applications have been submitted for properties located in densely populated streets characterised by Victorian and Edwardian terraced housing. These neighbourhoods already contend with challenges such as limited off-road parking and issues related to waste management. The increase in HMOs and flat conversions has only intensified these existing problems. Furthermore, there is a prevailing sentiment among residents that the rapid growth of HMOs is fundamentally altering the character of Shotton. In light of these concerns, we fully support the	Note, we believe that larger HMOs, specifically those accommodating six or more individuals, should have their waste treated as business waste, reflecting the volume and nature of refuse generated. **2. Access and Parking** We feel that the current guidance does not adequately address these parking concerns. The Draft Interim Guidance Note references policies requiring applicants to provide details on parking provisions and to justify reduced levels of parking through sustainability statements, based on research from the Department of Communities and Local Government. However, we believe that these requirements do not reflect the realities experienced in communities surrounding HMOs. In practice, a six-bedroom HMO could generate six or more vehicles, even though the policy's calculations	and recycling bins in a tidy and practical way. The Council has a dedicated webpage here: www.flintshire.gov.uk/en/Resident/Bins-Recycling-and-Waste/Landlords-Waste-Information.aspx relating to waste information for landlords and letting agents which indicates that waste is presently collected from rental properties by the Council. It would not be appropriate for the interim guidance note to introduce or require commercial waste collection measures for larger HMOs. **2. Not accepted.** The current standard of 0.4 spaces per bedsit has been in use for some time and represents the most reliable evidence available on parking needs for HMOs. This figure has also been accepted by Planning Inspectors in several appeal decisions, giving it established weight in planning terms. It is also important to	

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	implementation of measures aimed at limiting further HMO development. We broadly agree with the content of the Draft Interim Guidance Note and wish to present additional observations and suggestions for consideration. We express full support for the proposed requirements regarding minimum standards for room sizes, amenity space, and bathroom facilities within HMOs. Enforcing these standards will help ensure that all occupants reside in accommodation that provides sufficient space and amenities, thereby preventing overcrowding and promoting a reasonable quality of life. We fully endorse the proposals set forth in the Draft Interim Guidance Note relating to outlook and privacy. Ensuring that all accommodation, including those in basements and roof spaces, provides adequate privacy and access to	might suggest otherwise. The assumption that the availability of local services and public transport will meaningfully reduce private vehicle use is viewed as flawed, given the continued reliance on private cars. The increasing number of HMOs has led to more vehicles being displaced into back alleys, resulting in obstructions and disrupting waste and recycling collections.	note that Policy HN7 is applied to HMO development within settlement boundaries, which are therefore likely to be sustainable locations with good access to public transport and local services. Because of this, the 0.4 spaces per bedsit rate is seen as appropriate. Furthermore, paragraph 8.30 of the supporting text to Policy HN7 already refers to this parking standard, so it would not be appropriate to revisit or amend it through this guidance note. Interim policy guidance cannot change the policies within the LDP. The purpose of the interim policy guidance is to provide more detailed guidance on those policies and not to introduce any changes to the existing policy wording. Each HMO application will need to demonstrate that it is in a sustainable location and will not cause highway safety issues.	

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	outdoor amenity space is essential for maintaining resident well-being. We fully support the proposal that no more than two HMOs should be situated side by side, and that existing residential properties should not be sandwiched between HMOs. We also endorse the introduction of threshold controls to assess the concentration of HMOs within a 50-meter radius of any proposed new development. Specifically, if HMOs account for 10% or more of properties within this radius, planning permission may be declined. While we appreciate that this measure may only be feasible with the introduction of a full licensing scheme, currently under development by Community and Business Protection at Flintshire County Council, we support these efforts as a means to preserve the character and amenity of Shotton's neighbourhoods.		The Council's Highways and Development Management Officers will assess each proposal on its individual merits to make sure parking and access are suitable. This will involve a comparison of the parking generated by the existing / previous residential or other use of a property compared with the parking generated by a HMO to determine whether there is any increase in parking demand.	

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Officer Change	In 3rd sentence of para 1.4 replace 'different' with 'additional' to improve the reading of the sentence. The sentence will now read 'It is important to state that the Public Protection legislation sets out different additional standards and requirements which will not be addressed in this note'.			
Officer Change	In 2nd sentence of para 4.5 add at the beginning of the sentence 'For new build proposals…' to clarify that separation distances are more applicable to new build proposals that to existing older housing stock, where it may not be possible to satisfy them. The sentence will read **'For new build proposals,** ~~T~~the LPA considers that a reasonable outlook comprises a minimum distance of 12 metres between a main window in a habitable room and a blank wall (or a wall with a window of a non-habitable room).			
Officer Change	In para 4.6 replace first sentence with 'It is recognised that these standards may not be achievable in some of the urban areas, particularly when the creation of a HMO involves the conversion of older housing stock' to improve the reading of the sentence. The sentence will read ~~'These standards are generally applicable to new build proposals and in many urban parts of Flintshire these standards may not be achievable, particularly with conversions of older housing stock~~ **It is recognised that these standards may not be achievable in some of the urban areas, particularly when the creation of a HMO involves the conversion of older housing stock'.**			
Additional Officer Change	In order to better explain the relationship between housing and planning regimes in relation to HMOs and the introduction of the additional licensing scheme, make the following changes: Para 3.3 add after first sentence the following text '**This will apply to smaller HMOs than those covered by the Mandatory licensing described in para 3.2'.** Add a new paragraph after 3.4 **'It is evident from the preceding paragraphs that the way in which HMOs are defined differs between planning and housing legislation. This Interim Planning Guidance Note seeks to focus on HMOs requiring planning permission in terms of applying the planning considerations within policy HN7 of the LDP. However, the introduction of an additional licensing scheme alongside the mandatory licensing scheme will contribute to an evidence base which will aid planning decisions'.**			
Change arising from scrutiny committee	NRW made representations in respect of flood risk matters and requested that references to 'Risk Management Authorities' be included in the IPGN. However, the officer response to that representation noted that as para 4.22 is not related to flood risk it would not be appropriate to include this wording in para 4.22. It should therefore be deleted from para 4.22. Delete in para 4.22 the words ~~**'and Risk Management Authorities'**~~			