

Equality impact Assessment

Project Information	
Project Name	Implementation of an Article 4 Direction to restrict permitted development rights for Houses in Multiple Occupation (HMOs)
Service Area	Planning Policy
EIA Author	Aaron Roberts, Senior Planning Policy Officer
Date EIA drafted	23 rd April 2026
ID number	PPC001

Executive summary	
	<p>The committee report that this EIA is attached to considers the implementation of an Article 4 Direction to control Houses in Multiple Occupation (HMO) in Three Rivers.</p> <p>A House in Multiple Occupation (HMO) is a property with at least three tenants, forming two or more households and sharing certain facilities (such as a kitchen and bathrooms).</p> <p>The change of use of a building from its use as a dwellinghouse ("C3" of the Use Class Order) to its use as an HMO that is to be occupied by six or less residents, is currently automatically granted planning permission by virtue of Class L of Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (as amended) ("the GDPO").</p> <p>An Article 4 Direction is a planning tool used by Local Planning Authorities to remove permitted development rights for certain forms of development across a specific area or across the whole council area. Following the removal of permitted development rights, the grant of planning permission is required for the restricted form of development.</p> <p>The potential future reduction of HMO accommodation as a result of the Article 4 Direction might reduce options of relatively affordable housing for those with a protected characteristic and more vulnerable groups.</p>

Mitigations		
Protected Characteristic	Potential Issue	Mitigating Actions
Age	HMOs can be an important source of housing for many residents, particularly younger residents and young professionals who may otherwise not find alternative affordable accommodation in district. Increased control may impact the supply of further HMOs.	Once adopted the emerging Local Plan will enable the provision of a larger quantum of affordable accommodation.
Disability	The potential future reduction of HMO accommodation being created as a result of the proposal might reduce specialist housing options for co-living adults with physical, learning or mental disabilities.	Once adopted the emerging Local Plan will enable the provision of a larger quantum of affordable accommodation.

Gender reassignment (or affirmation)	No specific impact identified	
Pregnancy or maternity	No specific impact identified	
Race	The potential future reduction of HMO accommodation being created as a result of the proposal might reduce options of relatively affordable housing for households which can disproportionately include people from ethnic minorities.	Once adopted the emerging Local Plan will enable the provision of a larger quantum of affordable accommodation.
Religion or belief	No specific impact identified	
Sex	The potential future reduction of HMO accommodation being created as a result of the proposal might reduce options for specialist housing such as for women fleeing domestic abuse.	Once adopted the emerging Local Plan will enable the provision of a larger quantum of affordable accommodation, including specialist housing.
Sexual Orientation	No specific impact identified	
Marriage and Civil Partnership	No specific impact identified	
The council recognises other communities may be vulnerable to disadvantage, this includes carers, people experiencing domestic abuse, substance misusers, homeless people, looked after children and care leavers, (ex) armed forces personnel.	The potential future reduction of HMO accommodation being created as a result of the proposal might reduce options of relatively affordable housing for households which can disproportionately include other communities that may be vulnerable to disadvantage and their access to the affordable accommodation provided by HMOs	Once adopted the emerging Local Plan will enable the provision of a larger quantum of affordable accommodation.

Actions Planned

The proposal won't necessarily prevent future HMOs from occurring, rather, it will mean that planning permission is required to convert a dwelling into a HMO. While this might restrict/reduce the supply of future HMOs (which can act as a more affordable housing option) that would otherwise not have required planning permission, there are a number of measures through the emerging Local Plan that seek to address the provision of affordable housing and other housing options across the district. Additionally, the council's Housing Strategy and duty to homelessness prevention seek to ensure the provision of a range of housing options including for low-income people and people with specialist needs.

The potential negative impacts identified need to be balanced against the potential positive impacts that

the proposal would have in terms of ensuing greater planning control over new HMOs, for example ensuring that concentrations of HMOs do not occur and limiting the adverse impacts on the character and amenity of the area and local residents. Additionally, reducing the risks of unsuitable HMO accommodation (due to greater planning scrutiny) could also benefit occupants of HMOs.

The council has a statutory duty to provide advice, prevent homelessness, and secure emergency accommodation for eligible residents who are homeless or threatened with homelessness. As such the council would be able to monitor and recognise if the proposal causes problems for tenants who are identified as being potentially impacted, and has a number of services in place to respond.

Additional Information

Sign off:

Equalities Lead Officer	Date
Shivani Davé	19/05/2026

