

Planning Policy Guidance Note: Houses in Multiple Occupation (HMOs)

Approach to HMO Decision Making and Weight to be Given to Emerging Policy H6: Housing with Shared Facilities (Houses in Multiple Occupation)

Purpose

This note sets out how Royal Greenwich will assess planning applications for Houses in Multiple Occupation (HMOs) based on the development plan and emerging Policy H6 Housing with Shared Facilities (Houses in Multiple Occupation), as set out in the Royal Borough of Greenwich Regulation 19 Publication Draft Local Plan.

Development Plan

The current development plan in Royal Greenwich is made up of the London Plan 2021 and the Core Strategy with Detailed Policies 2014, and (where relevant) the Lee Neighbourhood Plan 2024. The Core Strategy with Detailed Policies will be replaced by the emerging draft Local Plan, once it has undergone Examination in Public and been adopted by the Council.

In the absence of an adopted Core Strategy policy specifically addressing HMOs, the Council has had limited policy basis to manage the cumulative impacts arising from their proliferation. It is considered that emerging Policy H6 now represents a reasonable basis against which to judge HMO proposals as this policy has been consulted on as part of the local plan and there are no significant unresolved objections. The weight to be given to this policy will be in accordance with the guidance set out in the NPPF and National Planning Guidance.

Emerging Policy H6

This note relates specifically to policy clauses 1-3, which govern proposals for Houses in Multiple Occupation (HMOs), rather than the policy clauses relating to Large-Scale Purpose-Built Shared Living.

Draft Local Plan Policy H6 sets out the following criteria in relation to HMOs:

1. *Proposals for Houses in Multiple Occupation (HMOs) will only be supported where they do not lead to an overconcentration in the local area. An overconcentration is where three or more of the nearest ten properties are HMOs.*
2. *Where proposals would not lead to an overconcentration, they will be supported where:*
 - a. *the original property has a gross internal area of 130sqm or more;*
 - b. *they provide an acceptable living environment for future occupants by complying with the requirements of the Council's Standards for Houses in Multiple Occupation and the requirements of our Urban Design Guide;*
 - c. *they provide adequate refuse and recycling storage, and one cycle parking space per occupant;*
 - d. *they are car-free in areas covered by Controlled Parking Zones (CPZs) and in areas not covered by CPZs, the development would not lead to on-street parking problems aggravating the safety and free flow of traffic and pedestrians in the area;*
 - e. *they are appropriately located in areas that are well-connected to local services by walking, cycling and public transport;*
 - f. *they are accompanied by a robust management plan to manage the operation of the HMO.*
3. *Development proposals that result in the loss of an HMO, or the self-containment of any part of an HMO, will be refused unless it can be suitably demonstrated that:*
 - a. *the existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; or*
 - b. *any replacement use includes housing provision that meets an identified local need such as family housing, with at least the equivalent amount of residential floorspace re-provided.*

Weight of Policy H6 in decision-making

This note has been prepared to set out the material weight that may be afforded to emerging Policy H6 when determining planning applications for HMOs.

Policy DM4 of the National Planning Policy Framework (2026) states that:

When preparing and considering development proposals, relevant policies in emerging development plans may be given weight according to:

- a. *The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*

- b. The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c. The degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).*

Stage of Preparation

Policy H6 forms part of the Regulation 19 Publication Draft Local Plan, which was subject to public consultation from Monday 27th July 2026 to Sunday 6th September 2026.

The policy has been informed by evidence gathering and Regulation 18 public consultation and is intended to form part of the submitted Local Plan.

In accordance with NPPF Policy DM4(a), the advanced stage of preparation supports the application of meaningful weight to the policy as a material consideration.

Extent of Unresolved Objections

Representations were received for Draft Policy H6 during the Publication Draft Local Plan consultation. A review of these representations indicates that many respondents were supportive of the overall objectives of the policy, including protecting family housing stock, managing concentrations of HMOs and ensuring appropriate standards of accommodation.

The principal unresolved objections relate not to the overall principle of the policy, but to specific aspects of its implementation, including:

- concerns that the proposed overconcentration threshold is insufficiently restrictive and should be strengthened;
- requests for alternative methods of measuring HMO concentrations;
- concerns that the Regulation 19 approach represents a weakening of the overconcentration controls previously consulted upon at Regulation 18;
- suggestions that additional matters should be considered within the assessment of HMO concentrations, including the treatment of unlicensed HMOs and other shared housing not captured by HMO licensing requirements;
- requests for amendments or additional requirements relating to sound insulation, monitoring, parking, cycle parking and management arrangements; and

- requests for clarification of policy wording and implementation, including the definition of key terms and how concentration assessments would be undertaken.

Notably, a significant proportion of objections argued that the policy should be more restrictive rather than less restrictive. Many respondents considered that stronger controls on HMO clustering were required and proposed tighter concentration thresholds or additional safeguards.

There were no objections to the underlying principle of managing HMO concentrations, protecting the borough's stock of family housing, or requiring HMOs to achieve appropriate standards of accommodation.

Accordingly, while unresolved objections remain and will be considered through the examination process, the outstanding representations are not significant and principally concern the detail of the policy approach and the most appropriate methodology for assessing HMO concentrations, rather than the overall objectives of the policy itself. Notably, no representations argued that the policy was too restrictive in its approach to managing the concentration of HMOs or to the introduction of a size threshold to protect smaller family-sized homes.

Compliance with National and Regional Planning Policy

The Royal Greenwich Local Plan will be examined against the 2024 NPPF and conformity tested against the 2021 London Plan, once submitted for Examination in Public.

National Policy

Policy H6 is considered to be consistent with the plan-making policies of the NPPF 2024. Although the NPPF 2024 does not explicitly mention HMOs, there are a few sections which are relevant.

For example, paragraph 96 of the NPPF 2024 promotes healthy, inclusive and safe communities that encourage social interaction, community cohesion and healthy lifestyles. As a form of higher occupancy housing, HMOs can contribute to housing choice and shared living opportunities, while policies that guide their location and concentration can help to ensure that they are provided in a manner that supports balanced communities, sustainable travel patterns and access to local services.

The emerging policy's approach of directing HMOs towards accessible locations is consistent with paragraph 110 of the NPPF, which seeks to focus development in sustainable locations and promote a genuine choice of transport modes. Given the higher occupancy levels associated with HMOs, ensuring access to public transport, local services and sufficient cycle parking can help minimise car dependency, encourage active travel and support sustainable patterns of development.

Policy H6 recognises the role HMOs play in meeting housing needs whilst seeking to ensure that conversions do not result in harmful concentrations that adversely affect residential amenity or community balance. The policy also seeks to safeguard family-sized housing stock, ensure acceptable living standards for occupants and support sustainable transport objectives.

In addition to the requirement for the policy to align with the NPPF 2024 for the purposes of plan-making, the new NPPF (August 2026) is a material consideration in decision making. HMOs, in line with the draft policy and this guidance note, will also achieve the objectives of policy HO5 'Meeting the needs of different groups', and Policy HO7 'Meeting the Need for Homes' as they will contribute to addressing housing need as identified in The Local Housing Needs Assessment.

Regional Policy

Furthermore, Policy H6 is consistent with London Plan Policy H9, which is currently the only HMO specific development plan policy, and recognises the role of HMOs in meeting local and strategic housing needs and states that HMOs of a reasonable standard should generally be protected.

Supporting Evidence

A Houses in Multiple Occupation (HMO) Evidence Base Paper has been prepared to support the policy and this guidance note. This sets out the need for the policy and the evidence underpinning its approach.

Conclusion

The current development plan does not contain explicit policy to manage applications for Houses in Multiple Occupation (HMOs). Emerging Policy H6 in the Royal Greenwich Publication Draft Local Plan therefore provides a reasonable basis of assessment of such proposals, having undergone public consultation.

Having regard to Policy DM4 of the National Planning Policy Framework, emerging Policy H6 has reached an advanced stage of plan preparation and is supported by a robust evidence base.

Whilst objections have been received through the Regulation 19 process, these are not significant in that they largely seek stronger controls on HMO concentrations, rather than opposing the principle of the policy itself.

Accordingly, emerging Policy H6 should be afforded significant weight in the determination of planning applications, with the precise weight afforded in individual cases depending on the relevance of the policy to the proposal and the nature of any remaining unresolved objections.

The weight to be attributed to the policy will be set out in each officer report.