

Housing Select Committee Agenda

Monday, 17 December 2018
7.30 pm, Committee Room 4
Civic Suite
Catford
SE6 4RU

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Part 1

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Housing Select Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Monday, 17 December 2018.

Janet Senior, Acting Chief Executive
Thursday, 6 December 2018

Councillor Susan Wise (Chair)	
Councillor Peter Bernards (Vice-Chair)	
Councillor Tom Copley	
Councillor Aisling Gallagher	
Councillor Leo Gibbons	
Councillor Silvana Kelleher	
Councillor Olurotimi Ogunbadewa	
Councillor Stephen Penfold	
Councillor Bill Brown (ex-Officio)	
Councillor Juliet Campbell (ex-Officio)	

MINUTES OF THE HOUSING SELECT COMMITTEE

Wednesday 31 October 2018, 7.30pm

Present: Councillors Peter Bernards (Vice Chair), Tom Copley, Aisling Gallagher, Leo Gibbons, Silvana Kelleher, Olurotimi Ogunbadewa and Stephen Penfold.

Apologies: Susan Wise (Chair)

Also Present: Margaret Dodwell (Chief Executive, Lewisham Homes), Cllr Paul Bell (Cabinet Member for Housing), David Austin (Head of Corporate Resources), David Syme (Strategic Planning Manager), Madeleine Jeffery (Private Sector Housing Agency Manager), Jeff Endean (Housing Strategy and Programmes Manager), Kevin Sheehan (Executive Director for Customer Services), and John Bardens (Scrutiny Manager).

1. Minutes of the meeting held on 18 September 2018

Resolved: the minutes of the last meeting were agreed as a true record with the following amendment:

- 1.1 Under the declarations of interest, Cllr Olurotimi Ogunbadewa to be recorded as a board member of Phoenix Housing instead of Lewisham Homes.

2. Declarations of interest

The following non-prejudicial interests were declared:

- Cllr Peter Bernards is a board member of Lewisham Homes.
- Cllr Olurotimi Ogunbadewa is a board member of Phoenix Housing.
- Cllr Silvana Kelleher is a Lewisham Homes tenant.
- Cllr Aisling Gallagher is a Lewisham Homes tenant.

3. Responses from Mayor and Cabinet

There were no responses.

4. Lewisham Homes business plan 2019-2022

Margaret Dodwell (Chief Executive, Lewisham Homes) introduced the report. The following key points were noted:

- 4.1 Lewisham Homes is developing its business plan for the next three years. It has engaged with residents, staff, staff unions, council officers, the Mayor, and local MPs.
- 4.2 As the council's housing-delivery company, Lewisham Homes' business plan will be aligned with the priorities of the council.

- 4.3 The business plan will include working in partnership with local organisations, such as health partners, to promote independent living, reduce social isolation, and improve access to employment.
- 4.4 The Chief Executive of Lewisham Homes will be meeting with the Director of Public Health for Lewisham to see how public health can be advanced through the housing agenda.
- 4.5 Finding ways to generate more income to fund tenancy sustainment and other discretionary activities is another key part of the business plan.
- 4.6 Lewisham Homes is taking into account the findings of the Hackitt report – which was commissioned by government following the Grenfell Tower fire to make recommendations on the future regulatory system.
- 4.7 Lewisham Homes is exploring opportunities for creating more homes by adding more stories on top of existing buildings – commonly known as ‘top-hatting’. This process could involve the use of modern methods of construction.
- 4.8 In order to deliver new homes, partnership working may involve joint ventures with housing associations, private contractors and other organisations.
- 4.9 Lewisham Homes wants to ensure that it is adding social value through its development programme by, for example, creating apprenticeships.

The committee asked a number of questions. The following key points were noted

- 4.10 Repairs are one of the most important issues for residents and fall within a number of areas of the draft business plan. The use of smart technology in assets, such as lifts for example, will be explored further as a way of improving services for residents.
- 4.11 Inclusivity training will be provided to the Lewisham Homes leadership team.
- 4.12 The committee noted Lewisham Homes’ responsibility to help tenants tackle anti-social behaviour and suggested that more detail on this should be included in the business plan.
- 4.13 The committee asked about the impact of the Government’s announcement to remove the cap on borrowing against the Housing Revenue Account (HRA).
- 4.14 The Cabinet Member for Housing informed the committee that a briefing on the lifting of the HRA cap, and what this enables, will be provided to all members once the detail has been worked through.
- 4.15 The committee will have the opportunity to scrutinise the business plan again in early 2019.

Resolved: the committee noted the draft business plan.

5. The budget

David Austin (Head of Corporate Resources) introduced the report. The following key points were noted:

- 5.1 The council's Medium Term Financial Strategy identified the need for continued cuts to be made to the council's budget over the coming four years.
- 5.2 This report sets out £21m of cuts proposals against the target of £30m cuts in the two years to 2020/21 - £17m in 2019/20 and £13m in 2020/21.
- 5.3 The proposals are aligned to the 10 corporate objectives and Lewisham 2020 strategy.
- 5.4 Officers will be developing and returning with further cuts proposals for the second year (2020/21).

Jeff Endean (Housing strategy and Partnership Manager) introduced budget cut proposal **CUS9**: *Cost reductions in homelessness provision – income generation and net budget reductions*. The following key points were noted:

- 5.5 CUS9 comprises two proposals. The first is focused on generating income by investing in further developments like PLACE/Ladywell, which generate a net financial return to the council.
- 5.6 The proposal is to generate £460k of income from five temporary accommodation projects. This will also provide at least 90 new purpose-built homes as alternative to nightly paid accommodation.
- 5.7 One of the five projects is to provide homes for adults with learning disabilities, which would allow residents currently housed outside of the borough to be brought back to Lewisham.
- 5.8 The second part of CUS9 is focused on reducing the number of households in nightly-paid accommodation through a number of measures, including the delivery of further council-developed alternatives like PLACE/Ladywell.
- 5.9 This part of the proposal is planned to save £641k over 2019/20 and 2020/21.
- 5.10 The committee also noted proposal COM9, *cut to intensive housing advice and support service*, and queried whether reducing this service could lead to more people falling into the cycle of homelessness, which could end up costing the council more.
- 5.11 Officers informed the committee that risk would be mitigated by the council's work on the Homelessness Trailblazer project and extra investment in the Housing Options Centre and Single Homeless Intervention and Prevention services. As part of the Homelessness Reduction Act, the council is switching

its focus to homelessness prevention and training frontline staff to support and advise residents at a much earlier stage.

- 5.12 Officers agreed to report back on the implementation of COM9 in six months to see how the pressures have changed and how the council has coped with the new arrangements.

Resolved: the committee noted proposal CUS9 and agreed to receive an update on the implementation of proposal COM9 six months after implementation.

6. Lewisham local plan

David Syme (Strategic Planning Manager) introduced the report. The following key points were noted:

- 6.1 The council is currently undergoing a review of the Lewisham local plan.
- 6.2 The local plan sets out a strategy for development in the borough over the next 15 years, with a particular focus on housing needs and the infrastructure and community facilities necessary to meet these.
- 6.3 The current local plan has delivered significant investment in homes, infrastructure and jobs, but most of the sites identified have now been built or have planning approval.
- 6.4 There have been significant changes in regional planning policy, with the draft London Plan, and in national policy, with the new National Planning Policy Framework.
- 6.5 The key challenge in relation to housing will be meeting the significant increases in housing targets set to be required by regional and national policy.
- 6.6 The draft London plan increases the borough's housing target by almost 50% - from 1,385 to 2,117 homes per annum. This equates to more than 20,000 new homes over the next ten years that have to be delivered. Lewisham's historical delivery rate is around 1,500 units a year.
- 6.7 The new NPPF introduces a new housing delivery test, which introduces tough sanctions on those councils that are not meeting their housing targets. By 2020, if the council falls below 75% of the housing target, it will be classified as a council with the presumption in favour of sustainable development. This means that the council's ability to refuse planning applications on local issues, and defending appeals from developers, becomes much weaker. The council would be assessed on national planning policy and there is a presumption in favour of sustainable development that meets the national policy. This is a significant risk for the council going forward.

- 6.8 The draft figures for April 2017 to March 2018 from the annual monitoring review, which provides data on, among other things, completions, approvals, Community Infrastructure Levy (CIL) revenue, and s106 agreements, shows a significant reduction in the number of homes completed.
- 6.9 The local Lewisham Strategic Housing Market Assessment (SHMA) identifies the housing need within the borough, for example, students, older people, people with disabilities, families, and sets out the mix of housing that needs to be provided. This document will provide much more detail on affordable housing.
- 6.10 The draft SHMA is expected to be published by mid November 2018.
- 6.11 The council is bidding for new funding through the Mayor of London's Homebuilding Capacity Fund, which provides funding to support councils to develop the capacity to deliver new approaches to increasing housing supply. Councils can bid for up to £750,000 for two years.

The Chair proposed to suspend standing orders to continue the meeting. The committee agreed to suspend standing orders.

- 6.12 The committee noted that new NPPF introduces a requirement to carry out viability tests of local affordable housing targets at the local plan stage and queried what impact this would have on the council's affordable housing target.
- 6.13 Given Lewisham's historical housing delivery rate, the committee expressed some concern about new regional and national housing targets and the consequences for local planning decisions of not meeting these.

Resolved: the committee noted the report and agreed to receive a report on the Lewisham Strategic Housing Market Assessment (SHMA) once published.

7. Housing assistance policy refresh

Madeleine Jeffery (Private Sector Housing Agency Manager) introduced the report. The following key points were noted:

- 7.1 The council's housing assistance policy sets out how the council will target financial support and assistance to those in the private housing sector who are not able maintain their own home due to age, disability, vulnerability, lack of resources or lack of knowledge.
- 7.2 The key aims of the policy are to improve health outcomes, promote independent living, delay and reduce the need for long-term care and support, improve the sustainability of private sector homes, and bring empty homes back into use.

- 7.3 Last year, the council improved nearly 100 homes through this policy, with a 95% satisfaction rate.
- 7.4 The committee noted the significant difference between the discretionary fund that is budgeted and that which is spent and queried why this was.
- 7.5 Officers explained that the difference between the budget and spend of the discretionary fund was due to number of reasons, including capacity within the team, backlogs, and awareness of the scheme among residents.
- 7.6 One of the key challenges with the housing assistance policy is to better target the support to the people who need it. A key part of this is improving communications and raising awareness of the scheme.
- 7.7 The Cabinet Member for Housing offered to provide a briefing on the housing assistance scheme for councillors, which they can share with their constituents.
- 7.8 The committee also asked how many empty homes had been brought into use through this scheme. Officers agreed to provide the statistics on this. Officers noted that they are seeing an increase in the number of empty homes.

Resolved: the committee noted the report; agreed to receive a briefing for councillors on the housing assistance policy; and agreed to receive statistics on the number of empty homes brought back into use through the policy.

8. New Homes Programme

Jeff Endean (Housing Strategy and Programmes Manager) introduced the report.

Resolved: the committee noted the report.

9. Select Committee work programme

John Bardens (Scrutiny Manager) introduced the work programme.

- 9.1 The committee agreed to receive a report on the Lewisham Strategic Housing Market Assessment (SHMA) at its meeting in December.
- 9.2 The committee agreed to amend to work programme to receive a report on the Lewisham Housing Strategy in March rather than January.

Resolved: the committee agreed the work programme.

10. Referrals to Mayor and Cabinet

There were no referrals.

The meeting ended at 22.10pm

Chair:

Date:

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Housing Select Committee			
Title	Declarations of Interest	Item No.	2
Contributor	Chief Executive		
Class	Part 1 (open)	17 December 2018	

Declaration of interests

Members are asked to declare any personal interest they have in any item on the agenda.

1 Personal interests

There are three types of personal interest referred to in the Council's Member Code of Conduct:-

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests

2 Disclosable pecuniary interests are defined by regulation as:-

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member's knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:-
 - (a) that body to the member's knowledge has a place of business or land in the borough; and
 - (b) either
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

(3) Other registerable interests

The Lewisham Member Code of Conduct requires members also to register the following interests:-

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25

(4) Non registerable interests

Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

(5) Declaration and impact of interest on members' participation

- (a) Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take no part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- (b) Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph (c) below applies.
- (c) Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- (d) If a non-registerable interest arises which affects the wellbeing of a member, their family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.

- (e) Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

(6) Sensitive information

There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

(7) Exempt categories

There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-

- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
- (b) School meals, school transport and travelling expenses; if you are a parent or guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor;
- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception)

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HOUSING SELECT COMMITTEE		
Report Title	Article 4 Direction for Lewisham’s southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO’s (Use Class C4)	
Key Decision	YES	Item No. 4
Ward	Bellingham, Downham, Whitefoot and Grove Park	
Contributors	Executive Director for Customer Services	
Class	Part 1	Date: 17 December 2018

1. Purpose

- 1.1. The purpose of this report is to provide a summary of the Lewisham HMO Review and Evidence Paper Update (November 2018), to inform the committee of officers recommendation to use of an Article 4 Direction covering Lewisham’s southern wards of Bellingham, Downham, Whitefoot and Grove Park to better manage the impact of small HMO’s within the boroughs southern wards and to set out the process, legal and financial implications of doing so.

2. Summary

- 2.1 A small scale House in Multiple Occupation (HMO) is a property where between 3 and 6 unrelated individuals share basic amenities as bathroom or kitchen. A small scale HMO falls within Use Class C4 of the Use Classes Order 1987 (as amended).
- 2.2 Current legislation allows a family dwelling (Use Class C3) to change to a small HMO (Use Class C4) without planning permission, by utilising ‘permitted development’ rights.
- 2.3 It is accepted that HMO’s can be an important source of low cost, private sector housing for those on low incomes, students and those seeking temporary accommodation as part of a balanced mix of housing.
- 2.4 However, negative impacts can arise from a high concentration of HMOs within particular areas. Guidance produced by DCLG, Housing in Multiple Occupation and possible planning response (2008) noted the following negative impacts that can be experienced in such circumstances:
- Anti-social behaviour, noise and nuisance;

- Imbalanced and unsustainable communities;
 - Negative impacts on the physical environment and streetscape;
 - Pressures upon parking provision;
 - Increased crime;
 - Growth in private rented sector at the expense of owner-occupation;
 - Pressure upon local community facilities and restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.
- 2.5 In response to increasing concern from Council Enforcement Officers, Councillors and local residents regarding the creation and concentration of poor quality HMO particularly within Lewisham's southern wards the Council carried out a review of the quality and spatial distribution of small scale Houses in Multiple Occupation (HMO) in the borough. (See Appendix 1)
- 2.6 In establishing an evidence base, the accurate identification of the quantity and spatial distribution of HMOs in the borough is problematic due to several factors. These include:
- The expansion of permitted development rights to allow conversion of a C3 dwelling house to Class C4
 - Unauthorised development
 - Underreporting of conversion
 - The different definitions of HMOs used by different Council/government departments
- 2.7 However, an indicative picture of the range of HMOs was built up by assessing data from the following sources:
- Planning application completions data
 - 2001 and 2011 census (Office for National Statistics)
 - Licensed HMO Council Tax records
 - Planning Enforcement cases
 - Benefits Data
- 2.8 The review concluded that whilst the data sets above did not suggest a significant increase of HMOs within the borough it did demonstrate a change in the spatial distribution of HMOs with a significant increase and clustering of HMOs within the boroughs southern wards.
- 2.9 This was further verified by street surveys carried out by the council from October 2017 focused on three Lewisham wards Bellingham, Downham and Whitefoot. Further details can be found in Appendix 1.
- 2.10 These southern wards which have traditionally had the lowest proportion of HMO's in the borough are unsuitable locations for high concentrations of HMO's due to their:
- High levels of deprivation
 - Poor public transport accessibility
 - Suburban character with a high concentration of family homes

- 2.11 Within these wards numerous properties within recent years have been extended and then converted to a small HMO using permitted development rights.
- 2.12 An Article 4 Direction made under the Town and Country Planning (General Permitted Development) Order 2015 (referred to hereafter as GDPO) removes these permitted development rights that would otherwise have been available to the property. It is important to note that an Article 4 Direction merely removes the permitted development right, it does not remove the right of a person to make an application for planning permission to carry out the development. Any such application would be determined in accordance with the development plan unless material considerations indicate otherwise.
- 2.13 The National Planning Policy Framework (NPPF) 2018 paragraph 53 states that.

The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities).

- 2.14 This report recommends the use of an Article 4 Direction for Lewishams Southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4). The making of an Article 4 Direction is considered to be in compliance with the NPPF and would enable the Council to better manage the impact of small HMO's within the boroughs southern wards. See Appendix 2 and 3

3. Recommendations

- 3.1 The Housing Select Committee is asked to note the content of this report, the supporting documents and the recommendations that will be put to the Mayor and Cabinet January 16th 2019.

Recommendations to Mayor and Cabinet:

- 3.2 Approve the making of a non-immediate Article 4 Direction for Lewisham's southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4) such direction to come into force 12 months after notice of the direction is published.
- 3.3 Authorise officers to carry out consultation in accordance with Section 6 of this report.
- 3.4 Note the financial and legal implications of making the Article 4 Direction set out in Section 7 and 8.

4. Policy Context – Article 4 Directions

- 4.1 The government's on-line national planning practice guidance (NPPG entitled "When is permission required?") sets out guidance on the use of Article 4 Directions.
- 4.2 An Article 4 Direction can be used to remove specific permitted development rights in all or parts of the local authority's area. It does not restrict development altogether, but instead ensure that development requires planning permission. A planning application for the proposal would need to be submitted that would then be determined in accordance with the development plan.
- 4.3 Article 4 Directions must apply to all uses within the relevant use class and it cannot restrict changes within the same use class.
- 4.4 The NPPG states that an Article 4 Direction to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the wellbeing of the area. It also states that in deciding whether an Article 4 Direction would be appropriate, local planning authorities should identify clearly the potential harm that the direction is intended to address (NPPG paragraph 038).
- 4.5 The process for making a non-immediate Article 4 Direction is as follows:
- **Stage 1** (the current stage) - the council decides whether to go ahead and make a Direction setting a date in the Notice for when the Direction will come into force which must be at least 28 days and no more than 2 years after representations can first be made, which is usually after the last publication/service date.
 - **Stage 2** – Publication / Consultation stage.
 - **Stage 3** – On the same day that notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction.
 - **Stage 4** – Confirmation Stage - the council cannot confirm the Direction until after a period of at least 28 days from publication/service of the Notice. Once a Direction has been confirmed, the council must give notice of the confirmation in the same way as it gave notice of the initial direction, and must specify the date that the direction comes into force. A copy of the direction as confirmed must also be sent to the Secretary of State.

5. Planning applications

- 5.1 If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine any proposal in accordance with the development plan unless material considerations indicate otherwise. In Lewisham's case, the development plan includes the London

Plan, the Core Strategy, the Development Management Plan, the Site Allocations Plan and the Lewisham town centre Local Plan.

5.2 The relevant policy relating to Homes in Multiple Occupation (HMOs) in the Lewisham Development Management Plan is **DM Policy 6 Houses in multiple occupation (HMO)**

1. The Council will only consider the provision of new Houses in Multiple Occupation where they:

- a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher*
- b. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood*
- c. do not result in the loss of existing larger housing suitable for family occupation, and*
- d. satisfy the housing space standards outlined in DM Policy 32.*

2. The Council will resist the loss of good quality Houses in Multiple Occupation.

3. The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

6. Consultation

6.1 Consultation on the confirming of the Article 4 Directions will comply with the provisions set out in the GPDO. Notice of the Direction will be made by:

- Local advertisement in the press.
- Site notices placed in visible locations for a period of at least 6 weeks.
- The requirement for written notifications can be waived as it is considered impracticable due to the number of owner or occupiers within the area.
- The document will be made available on the Council's website as well as in a number of convenient locations including Planning reception and local libraries.

6.2 Following consultation and within 6 months, a report recommending whether the Direction should be confirmed will be reported back to Mayor and Cabinet.

7. Financial Implications

7.1 The cost of making an Article 4 Direction can be met through existing budgets. A maximum expenditure of £1,000 is estimated.

7.2 There may be financial implications arising from the need to deal with future planning applications for change of use from C3-C4 which would have otherwise be covered under permitted development. This will be managed

within the existing planning budget. As of 17th January 2018 Lewisham now charges fees for applications covered by Article 4 Directions.

- 7.3 Section 108 of the Town and Country Planning Act 1990 includes a provision that compensation can be sought where (i) the LPA makes an Article 4 Direction, (ii) an application is made for planning permission to carry out development that would formerly have been permitted by the GPDO and (iii) the LPA refuses that application or grants permission subject to conditions differing from those in the GPDO.
- 7.4 However, where 12 months' notice is given in advance of a direction taking effect (non-immediate Article 4 Direction) there will be no liability to pay compensation (provided that the development authorised by the new changes had not started before the notice was published).

8. Legal Implications

- 8.1 The council's Constitution (November 2018) provides that the terms of reference for the Housing Select Committee is to:
- (a) review and scrutinise decisions made or other action taken in connection with the discharge of the Council of its housing function
 - (b) make reports or recommendations to the authority and/or Mayor and Cabinet with respect to the discharge of these functions
 - (c) make recommendations to the authority and/or Mayor and Cabinet proposals for housing policy
 - (d) to review initiatives put in place by the Council with a view to improving, increasing and enhancing housing in the borough, making recommendations and/or report thereon to the Council and/or Mayor and Cabinet
 - (e) To establish links with housing providers in the borough which are concerned with the provision of social housing

Therefore, Select Housing Committee is fulfilling its terms of reference by reporting and making its recommendations to Mayor and Cabinet on this Article 4 which will improving, increasing and enhancing housing in the borough.

- 8.2 Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various convention rights may be engaged in the process of making, considering and confirming Article 4 directions such as Article 1 of the First Protocol of the Convention.
- 8.3 The European Court has recognised that 'regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole'. Both public and private interests are to be taken into account in the exercise of the council's powers and duties

as a local planning authority. Any interference with a convention right must be necessary and proportionate.

- 8.4. The council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of all of the owners have been considered under the Human Rights Act 1998, in particular those contained within Article 1 of the First Protocol the Convention which relates to the protection of property, Article 6 (Right to a fair trial) and Article 8 (Right to private and family life).

9. Crime and Disorder Implications

- 9.1 There are no direct implications relating to crime and disorder issues.

10. Equalities Implications

- 10.1 The Equality Act 2010 (the Act) brings together all previous equality legislation in England, Scotland and Wales. The Act includes a public sector equality duty which covers the following nine protected characteristics: age; disability; gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 10.2 The Council must in the exercise of its functions, have regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - Foster good relations between people who share a protected characteristic and those who do not.

- 10.3 The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.

- 10.4 HMOs are most frequently occupied by low income, vulnerable and transient people. The proposal for an Article 4 Direction, if confirmed, will assist in delivering better quality housing and regulate their concentration improving the living conditions for occupants and those nearby.

11. Environmental Implications

- 11.1 A Strategic Environmental Assessment (SEA) Screening Assessment has been carried out and concludes that the proposed use of the Article 4 Direction is unlikely to have any significant effects. See Appendix 4

12. Conclusion

- 12.1 This report recommends the use of an Article 4 Direction for Lewishams Southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4). The making of an Article 4 Direction is considered to be in compliance with the NPPF and would enable the Council to better manage the impact of small HMO's within the boroughs southern wards.
- 12.2 The Housing Select Committee is asked to note the content of this report, the supporting documents and the recommendations that will be put to the Mayor and Cabinet January 16th 2019.

Recommendations to Mayor and Cabinet:

- 12.3 Approve the making of a non-immediate Article 4 Direction for Lewisham's southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4) such direction to come into force 12 months after notice of the direction is published.
- 12.4 Authorise officers to carry out consultation in accordance with Section 6 of this report.
- 12.4 Note the financial and legal implications of making the Article 4 Direction set out in Section 7 and 8.

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Supporting documents

- Appendix 1:** HMO Review and evidence paper November 2018
Appendix 2: Article 4 Direction
Appendix 3: Plan indicating extent of Article 4 Direction
Appendix 4: Draft SEA screening report



Lewisham HMO Review and Evidence Paper

Update November 2018.

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1.1 Introduction

- 1.1 This paper has been written in response to continued concern from Councillors and local residents in regard to the number of Houses in Multiple Occupation (HMO) in certain areas of the London Borough of Lewisham (LBL).
- 1.2 A report was written in 2016 which reviewed HMOs within the borough and whether or not an Article 4 Direction should be implemented to prevent this type of conversion in certain areas. It concluded that there was insufficient evidence to support an Article 4 Direction being implemented.
- 1.3 As part of this paper the Council have undertaken an update of the 2016 report and have updated and reviewed the evidence on HMOs. The paper also sets out the context for the review, providing an overview of relevant national, regional and local policy and a review of the mechanisms available to the Council to address the issues arising from the perceived concentrations of HMOs. It will assess whether there is now sufficient evidence to justify the implementation of a borough-wide or locally focused Article 4 Direction to prevent further conversion of homes into HMOs.

2016 review

- 1.4 In 2016, the Council carried out a review of the quantity and spatial distribution of HMOs in the borough. The review looked at whether there was sufficient evidence to demonstrate sufficient harm was arising from a concentrations of HMOs in order to justify the imposition of an Article 4 Direction to restrict such conversions.
- 1.5 The 2016 review was undertaken in response to concern from Council Enforcement Officers, Councillors and local residents regarding the creation of poor quality HMO particularly within the Bellingham, Downham and Whitefoot wards.

2018 review

- 1.6 Due to continued concern from Councillors and local residents, the Council have undertaken an update of the 2016 report. The purpose of the 2018 report is
 - 1) To update the data sets on the quantity, and spatial distribution of small scale HMOs.
 - 2) To review the mechanisms that the Council has to tackle this perceived problem.
 - 3) To ascertain whether there is now sufficient evidence to justify the implementation of an Article 4 Direction.

Evidence

- 1.7 For the 2016 review, an indicative picture of the range of HMOs was built up by assessing data from the following sources:
 - Planning application completions data
 - 2001 and 2011 census (Office for National Statistics)
 - Licensed HMOs
 - Council Tax records

- Planning Enforcement cases
- Benefits Data

1.8 For the 2018 review, the same sources were reviewed again apart from census data as this will not be next updated until 2021 by the Office for National Statistics. Streets surveys carried out by the Council in the wards of Bellingham, Downham and Whitefoot were also drawn upon to supplement the data sets outlined above.

- 1.9 In establishing an evidence base for 2016 and 2018 the accurate identification of the quantity and spatial distribution of HMOs in the borough was problematic due to several factors, the primary ones being:
- the expansion of permitted development rights to allow conversion of a C3 dwelling house to Class C4;
 - unauthorised development; and
 - under-reporting of conversions.

2. HMO definitions

2.1 HMOs are defined in a number of ways by different Council and government departments. This is an issue in itself for making the accurate identification of the quantity and spatial distribution of HMOs in the borough problematic.

2.2 A 2008 report by the Ministry of Housing, Communities and Local Government (MHCLG)¹ recognises that:

“HMOs consist of a variety of property types including: bedsits, shared houses, households with lodger, purpose-built HMOs, hostels, guesthouses, bed and breakfast establishment and self-contained flats, although not all of these accommodation types fall within the planning definition of an HMO or a housing definition of an HMO as defined under the 2004 Housing Act. However, it should be noted that despite the legal definitions of what constitutes an HMO, some properties such as shared houses where up to 5 or so individuals live together, are often regarded by some stakeholders as houses in multiple occupation (Paragraph 2.1) “

2.3 The definitions of a HMO within the planning, housing, council tax and census context are set out below:

Planning

2.4 Planning law² divides HMO types into two categories:

- A small HMO is defined as a dwelling that is occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom. A small HMO is classified as a ‘C4’ use within the Use Class Order, 2015. Single family dwellings

¹ Evidence Gathering – Housing in Multiple Occupation and possible planning responses Final Report (2008)

² The Town and Country Planning (Use Classes) Order 1987 (as amended) and The Town and Country Planning, (General Permitted Development) (England) Order 2015.

(classified as C3 use) are permitted to change use to a C4 use and vice-versa without the need to gain planning permission according to The Town and Country Planning, (General Permitted Development) (England) Order 2015.

- A large HMO is defined as a property that is occupied by more than 6 unrelated individuals that share basic amenities such as a kitchen or bathroom. A large HMO is classified as Sui Generis (a use that does not fall in any Class). The creation of a large HMO requires planning permission.

Housing

2.5 In summary, the definition of a HMO according to the Housing Act, 2004 is a building or part of a building that:

- *“is occupied by more than one household and where more than one household shares, or lacks an amenity, such as a bathroom, toilet or cooking facilities;*
- *is occupied by more than one household and which is a converted building, but not entirely into self-contained flats (whether or not some amenities are shared or lacking);*
- *and or, is converted into self-contained flats, but does not meet as a minimum standard the requirements of the 1991 Building Regulations (known as S275 HMOs), and at least one third of flats are occupied under short tenancies.”*

2.6 In addition to the above, the Housing Act, 2004 also requires a HMO to be licensed where it is either 3 or more storeys in height or is occupied by more than 5 people that form more than one household.

Council Tax

2.7 The Council Tax (Liability for Owners) (Amendment) Regulations 1992 define a HMO as any which:

- Was originally constructed or subsequently adapted for occupation by persons who do not constitute a single household; or (and prior to 1 April 1995).
- is inhabited by a person who, or two or more persons each of whom, is either: the tenant of, or has a licence to occupy part only of the dwelling (e.g. a single room) or; has a licence to occupy the dwelling, but is not liable (whether alone or jointly with other persons) to pay rent or license fee in respect of the dwelling as a whole.

3. Policy and legislative context

National

National Planning Policy Framework

3.1 The National Planning Policy Framework 2018 (NPPF) does not set out explicit guidance on HMOs. Although Paragraph 61 states *“size, type and tenure of housing needed for different*

groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers²⁵, people who rent their homes and people wishing to commission or build their own homes.”

Evidence Gathering – Housing in Multiple Occupation and possible planning responses 2008 (MHCLG)

3.2 This guidance was produced as a direct response to the problems associated with high concentrations of HMOs. Despite the document noting that positive regeneration impacts can result from such a housing concentration, such as improving the local environment and introducing a new population and life into an area, it also notes that the following negative impacts can also be experienced:

- anti-social behaviour, noise and nuisance;
- imbalanced and unsustainable communities;
- negative impacts on the physical environment and streetscape;
- pressures upon parking provision;
- increased crime;
- growth in private rented sector at the expense of owner-occupation;
- pressure upon local community facilities and restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.

3.3 It must be noted that this 2008 MHCLG report was largely concerned with the impacts arising from a high concentration of student HMOs and to a lesser extent migrant workers. Therefore, the generalisation of such impacts, in particular, anti-social behaviour, noise, nuisance and increased crime, to HMOs occupied by other social groups such as young professionals and low to medium vulnerable adults must be treated with caution.

3.4 The 2008 MHCLG document also identifies good practice in authorities that seek to manage HMO and tests the efficacy of planning policy in addressing the negative impacts identified above.

Planning Use Classes

3.5 Important changes affecting HMOs took place in 2010. The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010 (SI 653) came into force on 6 April 2010 and its main effect was to amend Class C3:

Prior to the amendment Class C3 read as below:

Dwellinghouses

Class C3 Use as a dwellinghouse (whether or not as a sole or main residence) by-

a single person or by people living together as a family, or by not more than six residents living together as a single household (including a household where care is provided for residents).

Post the amendment:

Class C3. Dwellinghouses

Use as a dwellinghouse (whether or not as a sole or main residence)- 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).

Interpretation of Class C3

For the purposes of Class C3(a) “single household” shall be construed in accordance with section 258 of the Housing Act 2004.”

Class C4. Houses in multiple occupation

Use of a dwellinghouse by not more than six residents as a “house in multiple occupation”.

Interpretation of Class C4

For the purposes of Class C4 a “house in multiple occupation” does not include a converted block of flats to which section 257 of the Housing Act 2004 applies but otherwise has meaning as in section 24 of Housing Act 2004.

After the publication of the 2010 amended Use Classes Order, the MHCLG then published ‘Changes to planning regulations for dwelling houses and houses in multiple occupation’ (2010) which further explained that “For the purposes of C3(b) and (c) single household is not defined in the legislation.” (Paragraph 1) and “*Furthermore, C3(b) continues to make provision for supported housing schemes, such as those for people with disabilities or mental health problems.*” (Paragraph 4).

3.6 The Town and Country Planning (General Permitted Development) (Amendment) (England)

Order also highlights the tenure types and types of management arrangements that are excluded from C4 (HMO between 3 and 6 unrelated individuals):

- “*Social housing is excluded from C4 as are care homes, children’s homes and bail hostels. Properties occupied by students which are managed by the education establishment, those occupied for the purposes of a religious community whose main occupation is prayer, contemplation, education and the relief of the suffering are also excluded. Some of these uses will be in C3, others will be in other use classes or fall to be treated as sui generis.*” (Paragraph 30)
- “*Properties containing the owner and up to two lodgers do not constitute a house in multiple occupation for these purposes.*” (Paragraph 31)

3.7 In the document 'Changes to planning regulations for dwellinghouses and houses in multiple occupation' Annex A Guidance on Classes it gives the following guidance in regard to large HMOs:

- *"Large houses in multiple occupation – those with more than six people sharing – are unclassified by the Use Classes order and are therefore considered to be 'sui generis'" (Paragraph 16)*
- *Although the control limit of six persons defines the scope of the C3 (b) and (c) dwellinghouses and C4 houses in multiple occupation classes, this does not imply that any excess of that number must constitute a breach of planning control. A material change of use will occur only where the total number of residents has increased to the point where it can be said that the use has intensified so as to become of a different character or the residents in relation to C3 no longer constitute a single household." (Paragraph 17)*

Regional

3.8 The 2016 London Plan and the 2017 Draft London Plan clearly acknowledge the role that HMO play in London's housing market. Paragraph 3.55 of the 2016 London Plan states that:

"Shared accommodation or houses in multiple occupation is a strategically important part of London's housing offer, meeting distinct needs and reducing pressure on other elements of the housing stock, though its quality can give rise to concern. Where it is of reasonable standard it should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of houses in multiple occupation"

3.9 The 2017 Draft London Plan has not changed its position on HMOs.

3.10 Achieving high standards of residential quality and design are matters that the 2016 London Plan seeks to deliver through Policy 3.5 Quality and Design of Housing Developments, in that *"housing developments should be of the highest quality internally, externally and in relation to the context and to the wider environment."*

3.11 This position is supported by paragraph 3.4.3 of the Mayors Housing SPG, 2016 which affirms that *"the Mayor is working with a range of stakeholders to support boroughs in taking local action and enforcing against illegal conversions/developments including beds in sheds"*.

3.12 With regards to housing mix, the 2016 London Plan Policy 3.9 Mixed and Balanced Communities seeks a mix of tenures and household incomes within communities *"particularly in some*

neighbourhoods where social renting predominates and there are concentrations of deprivation”.

- 3.13 The Mayor’s Housing SPG, 2016 also advises that a careful balance needs to be struck *“between local concerns, such as those to protect large houses for local family occupation, and the contribution they can make to meeting strategic and local needs if converted to HMOs”* (paragraph 3.4.2).
- 3.14 It is important to consider that non-self-contained housing units (which can include HMOs) contribute towards the borough’s housing delivery against the Mayor’s Housing targets. This point is raised in Paragraph 1.1.38 of the Mayor’s Housing SPG, 2016.
- 3.15 In the Council’s response to the 2017 Draft London Plan we welcomed the recognition in Policy H12 of quality concerns over some HMOs. We also noted that there are wider issues around HMOs and how these are being used to house some of the most vulnerable residents in the borough. Whilst beyond the role of planning we encouraged the Mayor to review these issues and provide strategic support.
- 3.16 The Council is also concerned that the presumption in favour of infill development in Policy H2 (Small sites) and more specifically encouraging conversions of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre could exacerbate the proliferation of poor quality, small HMOs.

Local

- 3.17 The provision and retention of good quality housing is recognised and encouraged by the Council through both strategic and detailed planning policies within the Core Strategy 2011 and Development Management Local Plan 2014 (DMLP)
- 3.18 For example, Core Strategy Policy 1 – housing provision, mix and affordability sets out the overarching borough housing requirements in accordance with the areas identified in Section 6 of the document. The Core Strategy is clear that any *“development should result in no net loss of housing”*. While DMLP Policy 15 – High quality design for Lewisham states that amongst other criteria the Council will apply national and regional policy, ensuring sites are sensitive to the local context and respond to local character in order to ensure development is of a high quality.
- 3.19 Policy DM 6 of the DMLP sets out the Council’s specific policy approach on HMOs and is set out below:
- “1. The Council will only consider the provision of new Houses in Multiple Occupation where they:*

- a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher*
- b. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood*
- c. do not result in the loss of existing larger housing suitable for family occupation, and*
- d. satisfy the housing space standards outlined in DM Policy 32.*

2. The Council will resist the loss of good quality Houses in Multiple Occupation.

3. The self-containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floor space is satisfactorily re-provided to an equivalent or better standard.”

3.20 One of the purposes of DM Policy 6 is to protect family housing unless environmental issues such as noise and lack of amenity space render the retention of a single dwelling unsuitable. However, these exceptions are subject to accordance with the plan’s design policies and a minimum floor space of 130 sqm.

3.21 Currently there is no policy in the Development Management Local Plan or Core Strategy which controls the growth and spatial distribution of HMOs.

4. Council mechanisms to control or deal with HMOs

Article 4 direction

4.1 The issuing of an Article 4 Direction would remove the “permitted development right” for converting a single dwelling house into a small HMO and would require that planning permission is granted before a change could be made.

4.2 An Article 4 Direction does not preclude applications for small HMOs being approved, however, the applicant would have to demonstrate that there is a specific need in the area, that the application would not “harm” the character of the area, that the accommodation is of a high standard then the application may be deemed acceptable alongside any other relevant DM policies within adopted local plan at the time.

4.3 An Article 4 Direction has no control over the management of an HMO.

4.4 The MHCLG³ produced guidelines in 2009 on possible planning responses to HMOs. Paragraph 44 of this document advised that: “If in a particular area it was considered that a local concentration of HMOs was giving rise to problems the local planning authority for that area could use existing powers and issue an article 4 direction removing the permitted development right for a defined area.

³ Houses in multiple occupation and possible planning responses (MHCLG, 2009)

4.5 Paragraph 157 of the 2018 NPPF states *“the use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area”*.

4.6 This is reinforced by the 2017 National Planning Policy Guidance (NPPG) which states that *“the potential harm that the direction is intended to address should be clearly identified”* (Paragraph 038). However, the 2018 NPPG makes no reference to article 4 directions.

4.7 If “harm” can be clearly and sufficiently identified, it is recommended that an Article 4 Direction made under Town & Country Planning (General Permitted Development) Order 2015 is implemented which suspends particular permitted development rights that otherwise would be available under that order.

4.8 There are two types of Article 4 directions under the 2015 Order:

- An immediate Direction withdraws permitted development rights with immediate effect; however a local planning authority may be liable to pay compensation to a landowner when PD rights are removed by an immediate Article 4 Direction. All claims for compensation must be made within 12 months of the date on which the planning application for development formerly permitted is rejected.
- A non-immediate Article 4 requires a 12 month interval after the end of the statutory consultation period (which must be conducted by the Council) and before the Direction comes into force. Therefore, a non-immediate Article 4 Direction is implemented to reduce the likelihood of any compensation claims against the Council.

4.9 There are other measures that the Council can employ to control the growth and spatial distribution of HMOs, such as incorporating thresholds into any future development management policies regarding HMOs if a need to do this is justified. Planning applications for the conversion of residential properties into HMOs can be directly assessed against such thresholds at either a street level, ward level or borough level.

Planning enforcement

4.10 It is the responsibility of the Enforcement Team within the Council’s Planning Service to take action against landlords/owner of properties whom have breached planning control by changing the use of C3 (dwelling houses) properties to large HMOs (6 or above unrelated individuals) without obtaining planning permission.

4.11 Guidance within the 2018 NPPF on planning enforcement is as follows:

“Effective enforcement is important to maintain public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. They should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the

implementation of planning permissions, investigate alleged cases of unauthorised development and take action where appropriate.” (Paragraph 58).

4.12 The Council does not have a local enforcement plan in place, although Lewisham’s Planning Enforcement team carry out its function in accordance with the ‘Planning Enforcement Charter – April 2013’. This charter sets out detailed guidance for residents regarding how the Council undertakes the enforcement of breaches of planning control. The general procedural approach of this charter is to act on a priority level of investigation.

4.13 Unlawful conversion of properties to HMOs would tend fall under 2nd Category Priority Cases. Paragraph 4.4 of the Enforcement charter defines this as *“where works or uses are causing a significant and continued harm to amenity”*. However, if there are a number of similar cases within an area such as a High Street or Conservation Area, then these may be treated as a greater priority than the individual breach. The priority will be determined according to the collective impact.

Licensing

4.14 Not all HMOs need to be licenced although where they can be mandatory, additional and selective licences are tools that Council can employ to deal with poorly managed HMOs. Lewisham’s mandatory and additional licence schemes have the following criteria:

Mandatory

4.15 By law, an HMO must have a mandatory licence if it is:

- three or more storeys high;
- has five or more people in more than one household; and
- shares amenities, such as bathrooms, toilets and cooking facilities.

4.16 HMOs that fall into the mandatory category are considered a large HMO under the Licensing scheme.

4.17 There has been an increase in the number of properties in Lewisham which are required to hold mandatory licences after the criterion requiring a premises to be three storeys or more was removed and came into force in October 2018. It is estimated that there will be an additional 400 licensable properties.

Additional License

4.18 Since February 2017 an additional licence is required for any HMOs above commercial premises.

4.19 This is called the ‘additional licence’ because the Council has imposed this on types of HMOs that do not meet the criteria for a mandatory licence. There is potential to extend the additional licensing scheme to help manage a wider range of HMOs. For example, an additional licence scheme could be applied to HMOs occupied by particular social group such as students.

Selective License

4.20 Licensing of other residential properties that are not subject to either mandatory or additional HMO license can be covered under a selective licensing scheme. This is where the council may declare that certain areas, for example where there is high demand for housing and/or antisocial behaviour, are appropriate for selective licensing. This licensing would cover all forms of private rented housing, including HMOs.

4.21 There is currently no selective scheme implemented by Lewisham Council. Officers however are currently working on a business case for a targeted selective licensing scheme for presentation to Mayor & Cabinet in the autumn if a positive case is found.

The process of licensing and how this helps tackle poorly managed HMOs

4.22 In 2007 the MHCLG⁴ published guidelines aimed at landlords and managers who manage a HMO. The document explains which HMOs are required to be licensed and what other responsibilities there are in relation to the management of HMOs. The council must give a licence if it is satisfied that the:

- HMO is reasonably suitable for occupation by the number of people allowed under the licence
- proposed licence holder is a fit and proper person
- proposed licence holder is the most appropriate person to hold the licence
- proposed manager, if there is one, is fit and proper
- proposed management arrangements are satisfactory, the person involved in the management of the HMO is competent and the financial structures for the management are suitable.

4.23 The licence will specify the maximum number of people who may live in the HMO. It will also include the following conditions, which apply to every licence:

- a valid current gas safety certificate, which is renewed annually, must be provided
- proof that all electrical appliances and furniture are kept in a safe condition
- proof that all smoke alarms are correctly positioned and installed
- each occupier must have a written statement of the terms on which they occupy the property, for example a tenancy agreement.

4.24 The following conditions may also be applied:

- restrictions or prohibitions on the use of parts of the HMO by occupants
- the landlord or manager must take steps to deal with the behaviour of occupants or visitors
- to ensure that the condition of the property, its contents, such as furniture, and all facilities and amenities, bathroom and toilets for example, are in good working order
- to carry out specified works or repairs within a particular time-frame
- a requirement that the responsible person attends an approved training course.

⁴ Licensing of Houses in Multiple Occupation in England - A guide for landlords and managers (2007)

Licensing Enforcement

4.25 The document ‘Licensing of Houses in Multiple Occupation in England - A guide for landlords and managers (2007) also outlines which tools a council possess to enforce a HMO licence scheme. In other words, if a property does not have a HMO licence and is required to do so the council can take the following action:

- *“the landlord or property manager can be prosecuted by council with potential fines up to a £20,000 plus costs.”* (Paragraph 6.1)
- *“make an interim management order on the building (and it can apply for a rent repayment order, in certain circumstances).”* (Paragraph 6.2)

5. Evidence - quantity and spatial distribution of HMOs

5.1 To understand the quantity and spatial distribution of HMOs the following sources of data have been used to provide an indication of the changes in that have occurred in that period:

- Census data has been compared for the years 2001 and 2011. *It should be noted that Census data is 7 years old and in some instances is inconsistent. Furthermore, not all shared houses are necessarily HMOs. As such, it does not provide a current or wholly accurate indication of the quantity and spatial distribution of HMO in the borough.*
- The 2016 evidence (which gives figures for 2015)
- Planning and Enforcement Records
- Licensing Records

2001 and 2011 Census Data

5.2 Over the period between 2001 and 2011 the number of households in the Borough rose by 6648 from 109 443 households to 116 091 households which is a 7% increase.

5.3 The number of shared dwellings rose by 447 from 788 to 1285, which was an increase of 63%. Appendix 1 shows the borough-wide household breakdown for the Census years 2001 and 2011.

5.4 The greatest increases in shared households have been in the following wards (see table 1).

- Lee Green (5 → 123);
- Brockley (57 → 134); and,
- Telegraph Hill (68 → 122)

5.5 During this period household owner/occupation has decreased by 6%, as has the number of people in shared ownership properties and in properties being rented by the Council whilst there have been increases in private renting, with the greatest increase being in accommodation rented from private landlords or letting agencies which has risen 11% (see table 2).

Table 1:

Total Number of Households in 2001 and 2011 by Ward					
	2001		2011		
Ward					
	All Households	Shared	All Households	Shared	Total Change in Shared Households
Bellingham	5911	37	6107	12	-25
Blackheath	6376	49	6423	52	+3
Brockley	5906	57	7435	134	+77
Catford South	5661	39	5712	81	+42
Crofton Park	5905	16	6263	27	+11
Downham	6150	0	6061	10	+10
Evelyn	6059	89	6883	96	+7
Forest Hill	6396	66	6506	67	+1
Grove Park	6274	6	6182	39	+33
Ladywell	6338	41	5762	43	+2
Lee Green	5423	5	6320	123	+118
Lewisham Central	6118	82	7722	96	+14
New Cross	6711	70	6576	114	+44
Perry Vale	6353	40	6707	86	+46
Rushey Green	6090	59	6257	77	+18
Sydenham	6934	55	6793	48	-7
Telegraph Hill	6250	68	6855	122	+54
Whitefoot	5588	9	5527	8	-1

Totals	109443	788	116091	1235	+447
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Table 2:

Tenure	Total Percentage of Households in 2001 by Tenure		Total Percentage of Households in 2011 by Tenure	
	No. of Dwellings	% of Housing Stock	No. of Dwellings	% of Housing Stock
Owner Occupied	52119	49	49228	42
Shared Ownership	1712	1.6	1436	1.2
Rented from Council	28536	26.6	18084	15.6
Rented from Housing Association	9654	9	17968	15.5
Rented from Private Landlord/Letting Agency	13143	12	26665	23
Other	2248	2	2710	2.3
Totals	107412	100	116091	100

Licensed HMOs

5.6 In December 2015 there were 196 properties licensed as a large HMO. As of December 2017, there were 254 properties licensed as either a large or additional HMO. Table 3 shows the year in which those HMO licenses were issued.

5.7 The 2016 evidence paper identified that on a borough-wide level, the number of HMO licensed each year since 2010 had increased. The 2016 evidence paper went on further to highlight that those increases have fluctuated, for instance, between 2014 and 2015 this number decreased with only 27 new licenses being issued.

5.8 This inconsistent pattern has continued beyond 2015 with 17 new licenses being issued in 2016 and 44 in 2017.

5.9 Furthermore, the sizeable rise of licenses being issued in 2017 may reflect the introduction of the additional license Scheme by Lewisham Council rather than a genuine substantial increase of HMOs.

5.10 The previous evidence paper identified those wards which had the greatest number of licensed HMO were (See table 4):

- Evelyn (36);
- Telegraph Hill (31); and
- Brockley (25).

5.11 As of 2017 the wards with the highest number of licensed HMOs remain the same:

- Evelyn (39);
- Telegraph Hill (33); and
- Brockley (29).

5.12 The 2016 evidence paper identified 108 streets had licensed HMO present in 2015. This has increased to 133 streets in 2017.

5.13 The 2016 evidence paper identified 33 streets had more than 1 licensed HMO as of 2015. As of 2017 this has increased to 39 streets.

5.14 The previous evidence paper identified streets which had the greatest number of licensed HMOs in 2015 were:

- New Cross Road (11);
- Pepys Road (9); and
- Lee High Road (8).

5.15 As of 2017 this has remained the same (See appendix 2):

- New Cross Road (16);
- Lee High Road (12); and
- Pepys Road (9).

Table 3:

Number of Large HMO Licenses Issued According to Year		
Year	No. of Large HMO Licensed	Total
2007	3	3
2008	3	6
2009	7	13
2010	9	22

2011	16	38
2012	31	69
2013	57	126
2014	43	169
2015	27	196
2016	17	213
2017	41	254

Table 4:

Distribution of Licenses HMOs by Ward		
Ward	Number of HMO	
	As of 2015	As of 2017
Bellingham	0	1
Blackheath	4	6
Brockley	25	29
Catford South	7	11
Crofton Park	11	17
Downham	2	5
Evelyn	36	39
Forest Hill	5	11
Grove Park	5	7
Ladywell	7	9
Lee Green	9	10
Lewisham Central	16	20
New Cross	11	17
Perry Vale	8	10
Rushey Green	13	20

Sydenham	4	7
Telegraph Hill	31	33
Whitefoot	2	2
Total	196	254

Council Tax records

5.16 In a HMO where tenants are paying rent for individual rooms on individual tenancy agreements, it is the landlord who is liable to pay Council Tax. Council tax records identified that in August 2015 there were 1173 HMO properties HMO according to their definition of a HMOs outlined in para 2.5. As of March 2018, the number properties identified as an HMO from this indicator has decreased by 9% to 1067.

Private Rented HMOs

5.17 Council tax records however included care homes and properties managed by organisations such as housing associations, homeless charities, universities and housing cooperatives. As such it was considered appropriate to focus on private-rented HMOs where a private landlord manages the property.

5.18 The number of private rented HMOs decreased by 16% from 988 properties in 2015 to 822 in 2018 (See table 5).

5.19 The 2016 evidence paper identified those wards which had the greatest number of private rented HMOs as of August 2015 were:

- Lewisham Central (96);
- Brockley (88); and
- Telegraph Hill (84).

5.20 As of March 2018, this has changed to (see table 5):

- Lewisham (96);
- New Cross (68); and
- Crofton Park (64).

5.21 As of August 2015, 476 streets in the Borough had a private HMO present. As of March 2018, this has decreased to 441 streets.

5.22 As of August 2015, 199 streets had more than 1 private HMO present. As of March 2018, this has decreased to 157 streets.

5.23 As of August 2015, the streets which had the greatest number of private HMOs were:

- New Cross Road (26);
- Lee High Road (18); and
- Bromley Road (15).

5.24 As of March 2018, the streets which had the greatest number of private HMOs remained the same (see appendix 4):

- New Cross Road (17);
- Lee High Road (14); and
- Bromley Road (12).

Table 5:

Distribution of Private Rented HMO by Ward		
Ward	Number of HMO	
	As of August 2015	As of March 2018
Bellingham	36	29
Blackheath	24	18
Brockley	88	63
Catford South	60	39
Crofton Park	70	64
Downham	31	33
Evelyn	43	45
Forest Hill	38	30
Grove Park	25	26
Ladywell	69	54
Lee Green	42	19
Lewisham Central	96	96
New Cross	82	68
Perry Vale	44	26
Rushey Green	78	19

Distribution of Private Rented HMO by Ward		
Ward	Number of HMO	
	As of August 2015	As of March 2018
Sydenham	46	48
Telegraph Hill	84	61
Whitefoot	32	38
Total	988	822

Non-private Rented HMOs

5.25 Housing associations, housing cooperatives, hostels, supported housing, purpose-built student accommodation and nursing homes have all been classified as non-private rented HMOs - where a private landlord does not manage the property.

5.26 The number of non-private rented HMOs has increased from 185 in 2015 to 245 in 2018. This represents a shift in the proportion of HMOs managed outside of the private-rented sector from 16% in 2015 to 23% in 2018.

5.27 Although council tax records indicate these properties as HMOs, this does not necessarily mean that they classify as a HMOs in planning terms. Therefore, the class use of these specified non-private rented HMOs and whether planning permission is required to change the use from C3 (dwelling house) are outlined below:

- Hostels would require planning permission as it falls under Sui Generis.
- HMOs managed by housing cooperatives classify as C4 (HMOs) in planning terms so whether planning permission is required depends on whether 6 or more unrelated individuals occupy the property.
- There is ambiguity over of the class use HMOs managed by housing associations; some will be in C3, others will be in other use classes or fall to be treated as sui generis.
- Supported housing would not require planning permission as it falls within the same class a dwelling house but of a different variation – C3 (b).
- Nursing homes would require planning permission as it has a different class use of C2 (Residential Institutions)
- Purpose built student accommodation would require planning permission as it has different class use of C2 (Residential Institutions).

Planning and completions data

5.28 Data obtained from the planning records for the period 2016 to 2017 highlighted only 9 approvals for Lawful Development Certificates relating to small HMO's. This is a minor increase

from the 2016 HMO Evidence Paper which highlighted there were no approvals relating to small HMOs for the period of 2010 to 2015.

Planning Enforcement Cases

5.29 Data obtained by the Enforcement Team indicates that there was a total of 54 HMO cases recorded in 2015. This has decreased to 22 recorded HMO cases in 2016 and then to only 11 cases in 2017 (see table 6).

5.30 However, it is important to note that the data can only be treated as indicative for two reasons. Firstly, conversions of residential properties to small HMO fall within permitted development rights and as such are only brought to the attention of Enforcement Officers via complaints or chance inspections of neighbouring properties. Secondly, there is no current systematic method of monitoring HMO.

5.31 The 2016 Evidence Paper identified wards which had the greatest number of recorded HMO enforcement cases in 2015 were:

- Bellingham (19);
- Whitefoot (18); and
- Rushey Green(4).

5.32 Of the 2016 and 2017 recorded cases this has remained the same (see table 7):

- Whitefoot (11);
- Bellingham (4); and
- Rushey Green (4)

5.33 The 2016 evidence paper identified there were 33 streets where an HMO case was present in 2015. Of the 2016 and 2017 recorded cases this decreased to 28 streets.

5.34 The 2016 evidence paper identified there were 13 streets where more than one HMO case was present in 2015, 13 of them had more than 1 HMO. Of the 2016 and 2017 recorded cases this has decreased to only 5 streets.

5.35 The 2016 evidence paper identified streets which had the greatest number of recorded HMO enforcement cases in 2015 were:

- Boundfield Road (6);
- Castillon Road (4); and
- Longhill Road and Firhill Road (3).

5.36 Of the 2016 and 2017 recorded cases this has changed to (see appendix 4):

- Bampton Road (2), Boundfield (2), Castillon Road (2), Knaphill Road (2) and Waters Road (2).

Table 6:

Year	No. of HMO Enforcement Cases
2010	2
2011	5
2012	7
2013	10
2014	29
2015	54
2016	22
2017	11

Table 7:

Ward	Number of HMO	
	2015	2016 and 2017 Combined
Bellingham	19	4
Blackheath	1	0
Brockley	2	1
Catford South	2	1
Crofton Park	1	0
Downham	1	0
Evelyn	0	1
Forest Hill	0	1
Grove Park	0	1
Ladywell	3	2
Lee Green	0	2
Lewisham Central	3	2
New Cross	0	2

Perry Vale	0	2
Rushey Green	4	4
Sydenham	0	0
Telegraph Hill	0	1
Whitefoot	18	9
Total	54	33

Benefits Records

5.37 The previous paper identified that at January 2016 there were a total of 37 HMOs in the Borough in which residents were receiving benefits. As of March 2018, this increased by 75% to 65 HMOs (see table 8).

5.38 In 2016 the wards which had the greatest number of HMOs were:

- Bellingham (18);
- Whitefoot (11); and
- Rushey Green (4).

5.39 As of 2018 this has remained the same with:

- Bellingham (31);
- Whitefoot (19); and
- Rushey Green (4).

5.40 In 2016 there were 26 streets where a HMO case was present. This has increased to 36 streets in 2018.

5.41 In 2016 there were 10 streets which had more than 1 HMO present. This has increased to 16 streets in 2018.

5.42 In 2016 the streets which had the greatest number of HMOs in 2016 were:

- Boundfield (3); and
- Adolf Street (2), Brookehouse Road (2), Catford Hill (2), Firhill Road (2), Ghent Street (2), Longhill Road (2), Oak Cottage Close (2), Stanstead Road (2) and Waters (2).

5.43 As of 2018 this has changed to:

- Firhill (5), Playgreen Way (5) and Waters Road (5)
- Boundfield Road (4), Castillion Road (4), Longhill Road (4), Brookehowse Road (4); and Catford Hill (4).

5.44 In each case there were no more than six housing benefit claimants at each identified property and therefore the lack of recording through Planning is likely to be because that planning permission is not required as small HMOs permitted development rights. They would also not appear on license register due to their size. It is worth is worth, however, noting none of the properties indicated by benefits data as HMOs appeared on council tax records as HMOs where the landlord is liable to pay council tax.

Table 8:

Distribution of HMOs as Indicated by Benefits Data		
Ward	Number of HMO	
	As of August 2015	As of March 2018
Bellingham	18	31
Blackheath	0	0
Brockley	0	0
Catford South	0	2
Crofton Park	0	0
Downham	0	0
Evelyn	0	0
Forest Hill	0	0
Grove Park	1	1
Ladywell	0	0
Lee Green	2	1
Lewisham Central	1	3
New Cross	0	1
Perry Vale	0	3
Rushey Green	4	4
Sydenham	0	0
Telegraph Hill	0	0
Whitefoot	11	19
Total:	37	65

5.45 Figure 1 below has mapped the HMOs which have been identified by benefits data. It shows there has been a proliferation of HMOs where housing benefit at a shared accommodation rate are paid.

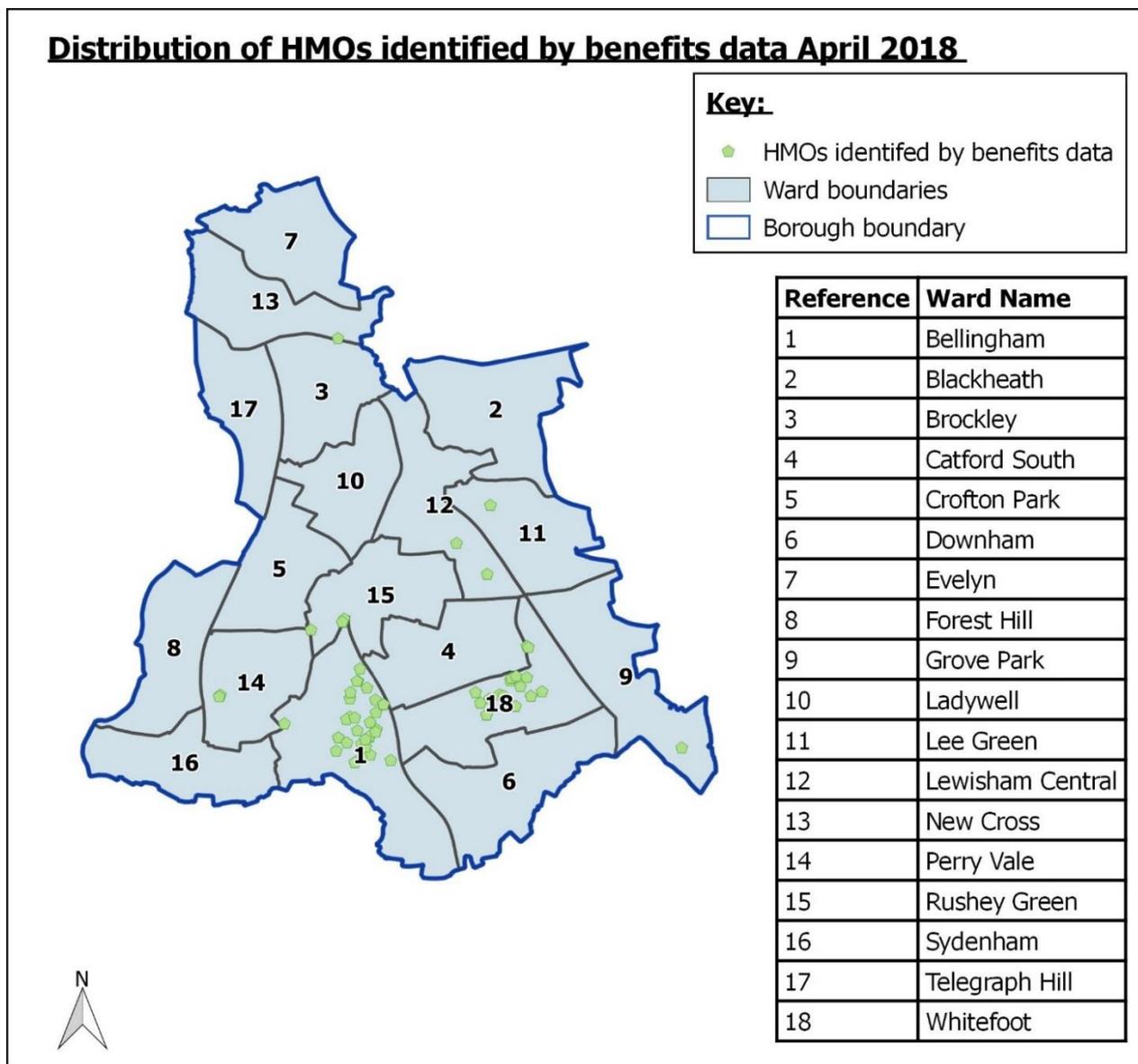


Figure 1

6. Street Surveys

6.1 To supplement the data above the Council has carried out monthly street surveys from 22/01/2018 to 24/01/2018 focused on three wards Bellingham, Downham and Whitefoot following community reports of nuisance and from the data sets above which highlighted that there was a high number of houses converted into HMO's in these areas. Fourteen streets were targeted with officers gaining access to properties to carry out inspections.

6.2 The aim of the street surveys were to:

- identify properties operating as HMO's but not licensed;

- investigate community reports of concentrations of 2 storey HMOs (currently not licensable) being developed in 3 bedroom terrace houses in these wards by companies with no local connection and for use by “vulnerable” residents referred to by other Boroughs;
- gain information and intelligence from community members on issues like anti-social behaviour, fly tipping, and drug misuse.

6.3 This briefing below summarises the most recent survey carried out from 22nd to 24th January 2018.

The results:

- Officers visited 1,800 properties (10% of total properties within the 3 wards) over the 3 days and access was gained (during the survey) into 1,123 properties (6% of total properties within the 3 wards).

Quantitative

6.4 Quantitative results from survey:

- 16 x new licensable 3 storey HMO’s identified and in the process of being licensed.
- 50 x HMO’s with further visits being undertaken to assess if licensable.
- 12 x (2 storey) HMO’s that will be licensable when the mandatory scheme extension rolls out in the next financial year. All of these were originally traditional 3 bedroom houses. The typical internal arrangements of these conversions were a shared kitchen, five bedrooms each with an en-suite bathroom and very limited cooking facilities within each rooms.
- 5 other “properties of interest” identified, which included;
 - Whitefoot ward - A brothel, which was reported to the Police & Crime Enforcement Regulations team for investigation.
 - Bellingham ward - 3 properties where out-buildings have been rented out and occupied as a residential premises (beds in sheds).
 - Bellingham ward - 1 property identified as being used for drug taking and dealing activities.
- A total of 78 HMO were identified within this sample survey.

6.5 Given the relatively small survey sample, 1,800 properties visited (10% of total properties within the 3 wards) over the 3 days and access gained into 1,123 properties (6% of total properties within the 3 wards) it is fair to assume that the numbers of HMO within these wards may be considerably higher than those indicated in the data sets outlined section 5. Whilst acknowledging the streets surveyed were in high-risk localities if these figures were scaled then the 3 wards could accommodate over 400 HMO (78 HMO identified having surveyed 6% of properties within the 3 wards would mathematically scale up to 468 HMO). Further evidence is required to verify this.

Qualitative

Qualitative feedback by ward:

Downham Ward:

6.6 Officers reported a high level of satisfaction reported amongst residents, very low levels of fly-tipping and anti-social behaviour and a feeling of a “close community”. There was a high incidence of properties occupied by families that were either privately owned or renting from Phoenix Housing Trust. The level of reported disrepair within the actual dwellings was low.

Whitefoot Ward:

6.7 Officers reported a reasonable level of satisfaction reported by its residents, but with slightly higher instances of fly-tipping and anti-social behaviour. In terms of tenure profile there was a real mix of privately owned and social housing. The level of reported disrepair within the actual dwellings was low.

Bellingham Ward:

6.8 Officers reported a noticeable increase in residents’ complaints with a high number of reports about fly-tipping, antisocial behaviour and criminal activity. In terms of tenure profile there was a high number of elderly residents renting properties from Phoenix Housing Trust. There was also the highest concentration of converted 3 bedroom houses to HMOs in this ward. There were some vulnerable tenants housed within these properties. Officers also witnessed criminal activity during the survey which was reported and there were 2 arrests by the Police. The victim was an elderly resident.

Other feedback

6.9 Officers reported that a high percentage of the occupants they interviewed, where they gained access to HMOs reported they had “substance abuse, mental health issues or had recently been released from prison”. They had all been referred to the property managing agents by other Boroughs or charitable organisations. The companies themselves have no local connection with Lewisham.

6.10 A council tax search was undertaken of 20% of the HMO’s identified in the survey. The search showed that the council tax was paid by the occupants making identification of the landlord more difficult. The occupants interviewed reported that they either received housing benefit or had their rent paid by their housing authority. There were higher levels of reported ASB in areas where there was a concentration of HMOs.

6.11 As part of this review, views of local residents and stakeholders in the community were also obtained in the form of surveys and complementary community forum regarding an increase in small HMOs in Bellingham and Whitefoot - 7 surveys were received. The concerns raised also reiterated the pressure a coming from a change demographic and increase in households; from

excessive noise and waste negatively impacting on residential amenity to increased pressure on third sector organisations (voluntary and community organisations).

7. Summary on the quantity and spatial distribution of HMOs

- 7.1 The majority of wards within the borough have not seen a substantial increase in HMOs and, in fact, a decrease has been observed in most wards as indicated by council tax records. Furthermore, a change in the spatial distribution of HMOs both between wards and within wards on a street level cannot be observed from these specific data sets.
- 7.2 However, the data sets, which do show an increase in HMOs are licensing and benefits data. Licensing data shows an increase of 60 HMOs since 2015, this increase is proportionately distributed amongst wards which have historically had a high presence of HMOs such as Lewisham Central, New Cross and Brockley. Moreover, as outlined in para 5.9, the increase indicated by licensing data may not reflect a genuine increase of HMOs but rather the introduction of the additional licensing implemented by Lewisham Council in 2017.
- 7.3 Of concern however the substantial increase in HMOs is identified through the benefits records data (Shared Accommodation Rate claims) clustered within the southern wards of the borough and in particular Bellingham and Whitefoot as illustrated in figure 1. Bellingham, Downham, Whitefoot and Grove Park have traditionally had the lowest presence of HMOs within the borough as indicated by 2001 and 2011 census data, HMO licenses and council tax records.
- 7.4 This increase of HMOs within the borough's southern wards has been verified by Street Surveys that identified a total of 78 HMO within targeted streets in Bellingham, Downham and Whitefoot wards. Given the relatively small survey sample it is fair to assume that the number of HMOs within these wards may be considerably higher than those indicated in the data sets outlined section 5 of this document.
- 7.5 The Shared Accommodation Rate (SAR, previously the Shared Room Rate) was introduced in 1996 and originally limited the Housing Benefit that a single person under the age of 25 could receive the average rent level charged for a room in a shared house. As part of the October 2010 Spending Review the Government announced that the SAR would be extended to cover single claimants up to age 35 from April 2012. This change was brought forward to 1 January 2012 and was implemented by The Housing Benefit (Amendment) Regulations 2011 (SI 2011/1736)⁵.
- 7.6 A growth in the number of HMOs occupied by housing benefit claimants can in part be attributed to this expansion in the number of people whom are entitled to SAR. It is reasonable

⁵ House of Commons Library: Housing Benefit: Shared Accommodation Rate, Wilson (2014)

to assume that such changes to housing benefit legislation are likely to have expanded the HMO market by adding to the proportion of the rental population whom can only afford a room in a shared house. In effect, opportunities for landlords seeking to purchase single-family dwellings and convert them into HMOs has also likely have widened following this expansion in potential HMO occupants.

7.7 Why the growth in the number of HMOs occupied by shared housing benefit claimants has been concentrated in Bellingham and Whitefoot can in part be explained by the relatively low property values in these wards. Figure 2 demonstrates that in December 2017 Lewisham’s southern wards (Bellingham, Whitefoot and Downham) and Grove Park to east fell within the borough’s lowest median price bracket paid for existing dwellings - £330,000- £379,850. This, combined with house prices rising rapidly throughout the borough (as identified in the July 2018 draft Private Rented Market in Lewisham 2018 paper), strengthens financial incentives for landlords seeking to purchase single-family dwellings and convert them into small HMOs within Lewisham’s southern wards and Grove Park.

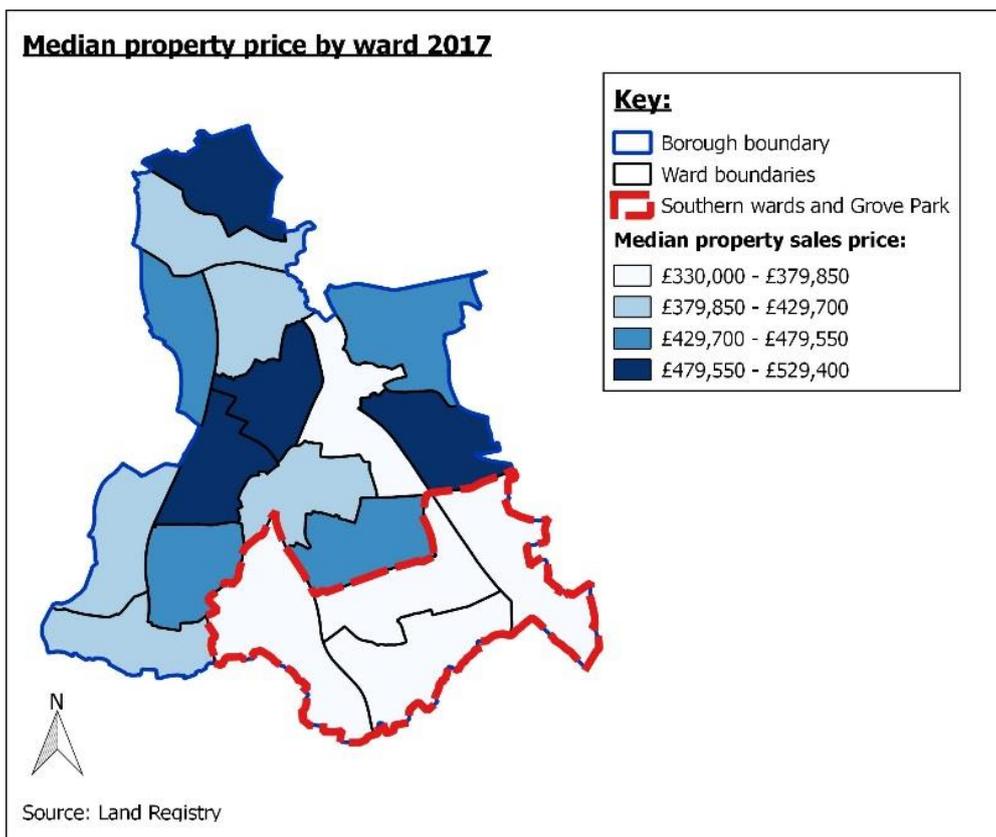


Figure 2

8. Impact on Lewisham’s southern wards and Grove Park arising from a growth in small HMOs

- 8.1. An over concentration of HMOs may result in harmful impacts as highlighted in paragraph 3.3: anti-social behaviour and nuisance; imbalanced and unsustainable communities; negative impacts on the physical environment and streetscape; pressures upon parking and provision; increased crime and growth in the private sector at the expense of private ownership.
- 8.2 There are certain characteristics particular to Lewisham’s southern wards and Grove Park which must be examined and which may mean that a proliferation of HMOs affect them to a greater extent than in other wards and will make them less able to cater for or cope with substantial conversion of its single dwelling housing stock into small HMOs.

Deprivation

- 8.3 The growth of HMOs identified by benefits data has occurred within the borough’s most deprived areas in particular within the wards of Bellingham and Whitefoot as indicated in figure 3, using the 2015 Multiple Deprivation Index (comprised of employment, health deprivation and disability, education skills and training, barriers to housing and services, crime and living environment). Large areas of Downham and Grove Park are also some of the most deprived areas in the borough. The negative impacts associated with an over-concentration of HMOs are likely to be amplified in these areas. Or to put it differently, areas with high levels of deprivation are less in the position to withstand or deal with the negative impacts often associated with an over-concentration of HMOs.
- 8.4 It is also important to recognise the growth in HMOs within Lewisham southern wards are housing low-income residents seeing these properties wards were identified by housing benefits data. HMO growth of this particular nature may reinforce spatial inequalities or concentrations of disadvantage that exist within the borough.

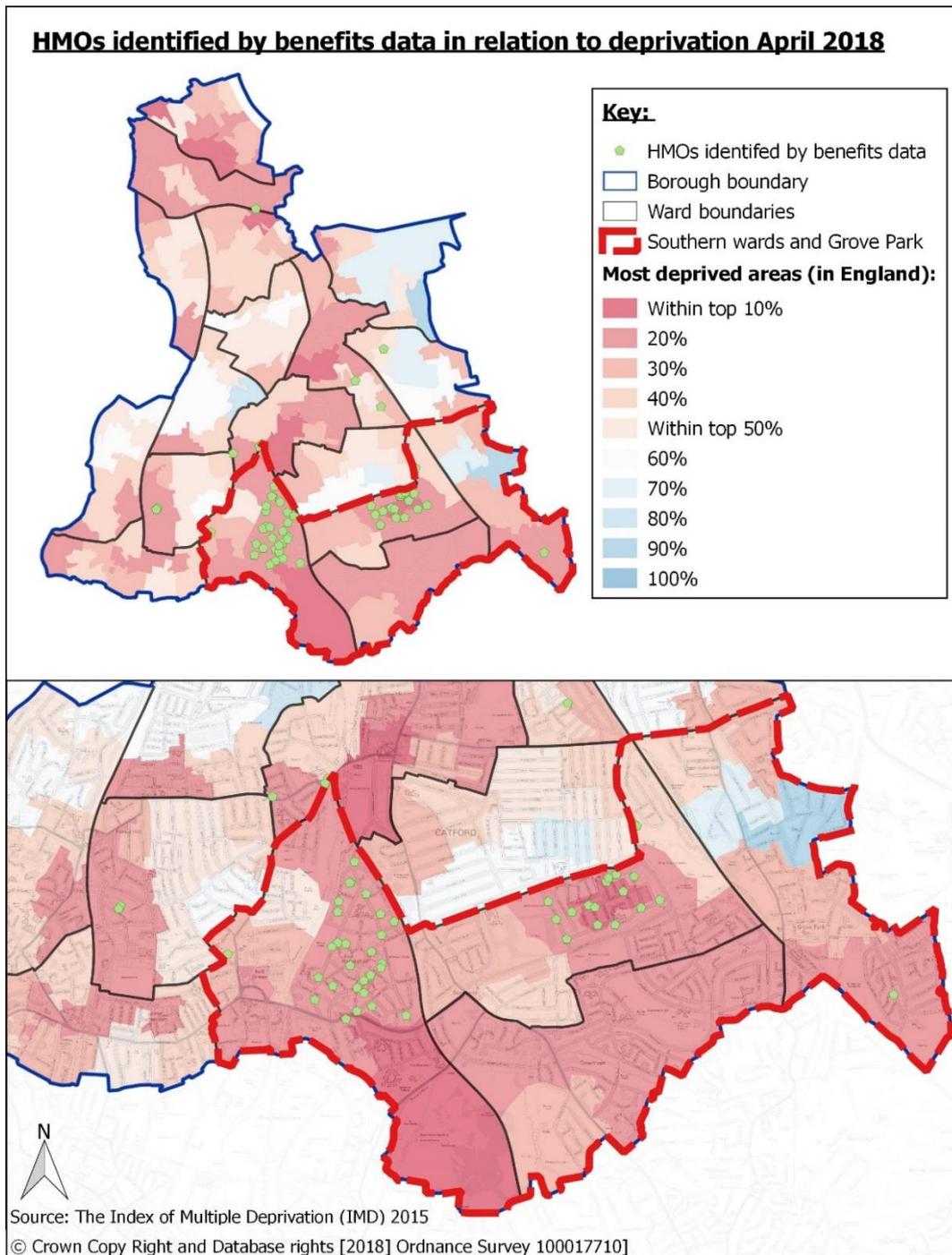


Figure 3

Transport Connectivity

8.5 Within Lewisham’s adopted 2014 DMLP DM Policy 6 – Houses in multiple occupation (HMO), the Council will only consider the provision of new HMOs where they are located in an area with a public transport accessibility level (PTAL) of 3 or higher. The recent growth however of small HMOs identified in Whitefoot and Bellingham fall in low PTAL of either one or two as illustrated in Figure 4. This figure also illustrates the majority of Bellingham, Whitefoot, Downham and Grove Park fall within a PTAL level below 3.

8.6 An uncontrolled growth of HMOs in these areas of poor public transport accessibility undermines the Council's ability to ensure sustainable communities.

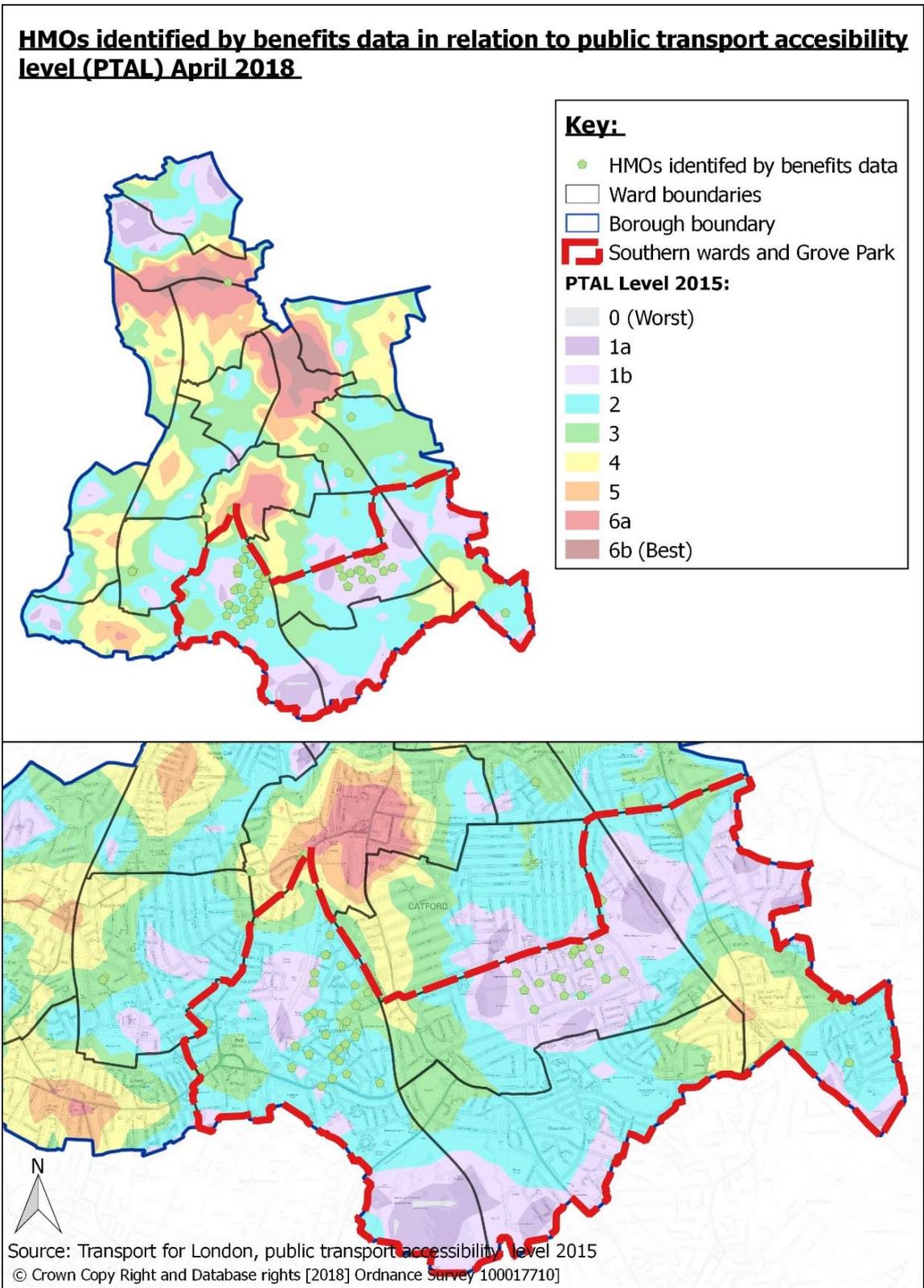


Figure 4

8.7 The draft 2018 Character Study highlights some issues that poor transport connectivity and in effect a car reliance already presents to the streetscape of Lewisham’s southern wards:

“Most of the houses ... were not planned with car ownership in mind and as a result car parking is accommodated in an ad hoc manner often dominating the streetscapes. Many streets have parked cars often on both sides of the road and many front gardens have been converted to provide off road parking. The loss or reduction of front gardens to provide parking often has a detrimental effect on the quality of the streetscape as garden vegetation is lost, boundary hedges are removed and the frontage line of properties is broken by the creation of new crossovers. (P.92) ”

8.8 An increase in the number of households from the conversion of C3 dwellings into small HMOs will exacerbate this issue by increasing the number of cars per street

Suburban Character

8.9 Lewisham southern wards can be said to have a suburban characterisation in terms of its population density, household composition predominance of family housing typologies, as is shown in the photographs below.



Figure 5

Source: Draft Lewisham Character Study 2018

8.10 Lewisham’s DMLP 2014 DM Policy 6 states that - Houses in multiple occupation (HMO) states that the Council will only consider the provision of new HMOs where they do not do not result in the loss of existing larger housing suitable for family occupation.

8.11 A change of use of a single family house to a HMO would reduce the number of available family dwelling homes within the borough, particularly in a place where prices are more affordable such as Bellingham, Downham, Whitefoot and Grove Park, limiting the availability of such stock.

8.12 Figure 6, illustrates Lewisham southern ward have the borough’s highest proportion of households with a child - between 38% and 41%. An uncontrolled change of C3 dwellings into small HMOs could, therefore, pose the greatest character change in terms household composition relative to other areas in the borough.

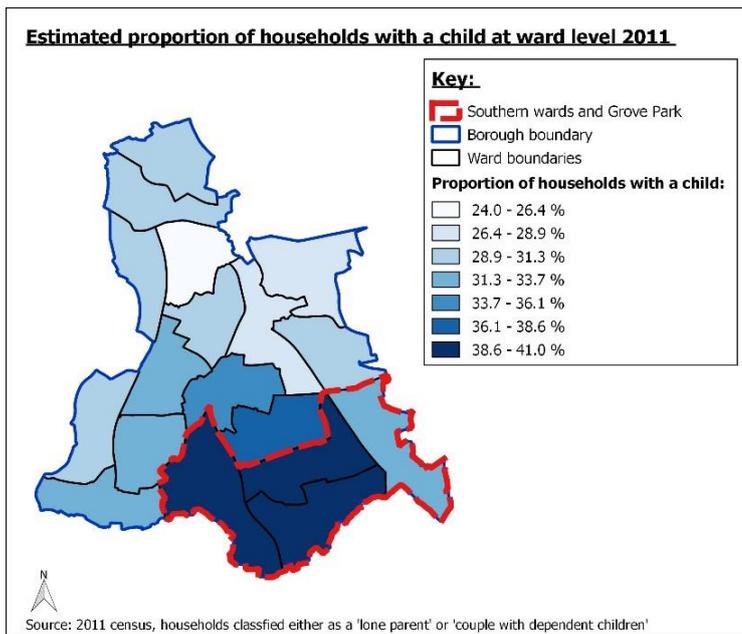


Figure 6

8.13 Figure 7 shows Lewisham's southern wards and Grove Park have a relatively low level of population density compared to rest of the borough. These wards have nearly half the amount of people per hectare than in Lewisham Central, Deptford and Evelyn. This is due to its particular housing typology and streetscape, in that the housing stock is mainly 2-3 storeys high, is predominantly made up of houses with gardens and the road widths are generous (See Figure 8). There are also large estates within these wards which have specific and regular characters, such as the Bellingham Estate.

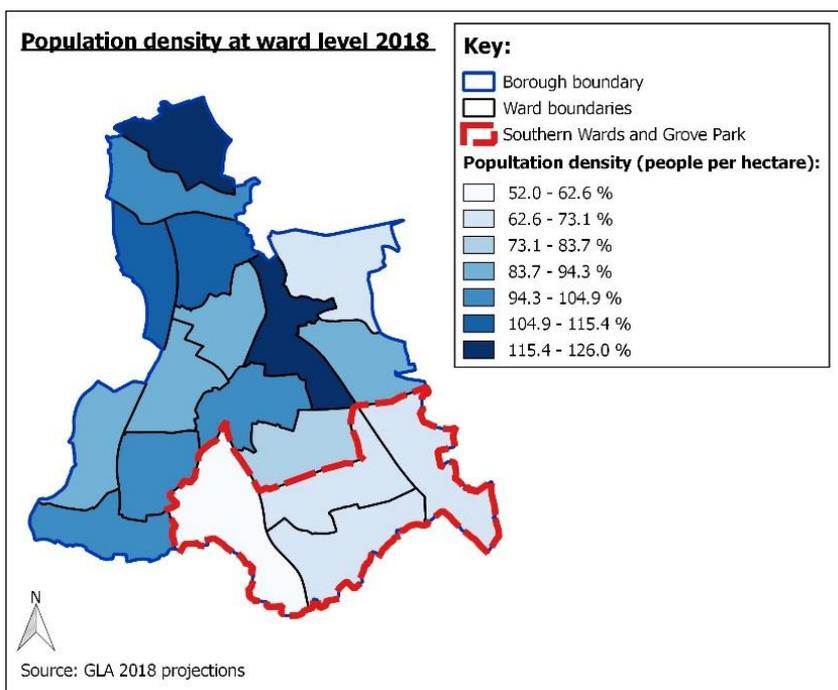


Figure 7

Figure 8: 3D illustration of Lewisham's Southern wards and Grove Park's typology:



Source: Draft Lewisham Character Study 2018

8.14 Intensification, increase in population and change to the household type is noticeable as a result of small HMOs in the southern wards. Any further uncontrolled change of C3 dwellings into small HMOs will further undermine the character of these area and be more likely to adversely affect the living conditions of neighbours. The draft Characterisation Study 2018 recommends:

“Any intensification of the borough's lower density areas will need to come hand in hand with improvements to public transport provision to reduce the reliance on the car, particularly in areas in the south of the borough. Similarly, there are areas with opportunities for new development but better shops and services would need to be delivered alongside any intensification”p.96

9. Conclusions

- 9.1 On the strength of the data that has been discussed in this paper, the implementation of a borough wide Article 4 Direction which restricts HMOs cannot be justified as an increase in HMOs at borough wide level to the point where it is having an adverse impact on the borough's character or on the living conditions of nearby residents cannot be observed.
- 9.2 As outlined in section 7, there has been a substantial increase in HMOs identified through housing benefits records clustered within the southern wards of the borough and in particular within Bellingham and Whitefoot. This increase of HMOs has been verified by Street Surveys targeted streets in Bellingham, Downham and Whitefoot wards which have traditionally had the lowest presence of HMOs alongside Grove Park.
- 9.3 Owing to their strong suburban character, high levels of deprivation and low PTAL, it is considered that Lewisham's southern wards and Grove Park are not able to cater for or cope with negative impacts and needs associated with any further conversions of dwelling houses into HMO.

10. Recommendations

- 10.1 Given the above, an Article 4 direction to remove permitted development rights to prevent changes from C3 dwelling houses to small HMOs in Lewisham's southern wards (Bellingham, Whitefoot and Downham) and Grove Park is recommended. This will help the Council to ensure that any further growth in small HMOs in these wards is monitored and their impact assessed. It also offers the opportunity to mitigate some elements of an HMO (such as refuse storage arrangements) through the planning application process
- 10.2 It is also recommended that a selective or additional licence scheme is explored to support any Article 4 Direction to deal with any rise HMOs in the borough's southern wards and Grove Park.
- 10.3 The development management policy on HMOs within the incoming 2019 Local Plan should deal or cover with the overconcentration of HMOs.
- 10.4 Finally, Council-wide monitoring system which facilitates cross-departmental data sharing and a better understanding of HMOs should be developed. It can be used to as part of a robust evidence to support future Article 4 Directions and extensions to existing licencing.

11. Appendices

Appendix 1:

Total Number of Households in 2001 and 2011 by Type			
	2001	2011	Total Change
Unshared Dwelling: Whole House or Bungalow: Detached	3212	3771	+559
Unshared Dwelling: Whole House or Bungalow: Semi-detached	14073	15328	+1255
Unshared Dwelling: Whole House or Bungalow: Terrace (inc. end of terrace)	34436	32780	-1656
Unshared Dwelling: Whole House or Bungalow: Total	51721	51879	+158
Unshared Dwelling: Flat, Maisonette or Apartment: Purpose-Built Block of Flats	35559	41459	+5900
Unshared Dwelling: Flat, Maisonette or Apartment; Part of a Converted or Shared House (Including Bed-Sits)	19591	19692	+101
Unshared Dwelling: Flat, Maisonette or Apartment: In Commercial Building	1692	1774	+82
Unshared Dwelling: Flat, Maisonette or Apartment: Total	56842	62925	+6083
Unshared Dwelling: Caravan or Other Mobile or Temporary Structure	92	52	-45
Unshared Dwellings: Total	108655	114856	+6201
Shared Dwellings: Total	788	1235	+447
Total Number of Households	109443	116091	+6648

Appendix 2:

Licensed HMOs 2015		Licensed HMOs 2018	
Road	No of HMO	Road	No of HMO
New Cross Road	11	New Cross Road	16
Pepys Road	9	Lee High Road	12
Lee High Road	8	Pepys Road	9
Alloa Road	7	Alloa Road	7
Trundleys Road	6	Hither Green Lane	7
Evelyn Street	5	Scawen Road	7
Hither Green Lane	5	Evelyn Street	6
Queens Road	5	Trundleys Road	6
Scawen Road	5	Queens Road	5
Plough Way	4	Breakspears Road	4

Shardeloes Road	4	Deptford High Street	4
Bellingham Road	3	Honor Oak Park	4
Breakspears Road	3	Perry Vale	4
Drakefell Road	3	Plough Way	4
Grove Street	3	Shardeloes Road	4
Jerningham Road	3	Baring Road	3
Lewisham Way	3	Bellingham Road	3
St Donatts Road	3	Brockley Road	3
Sydenham Road	3	Chudleigh Road	3
Amersham Road	2	Drakefell Road	3
Baring Road	2	Grove Street	3
Bartram Road	2	Jerningham Road	3
Brockley Road	2	Lewisham Way	3
Deptford High Street	2	St Donatts Road	3
Enterprize Way	2	Stanstead Road	3
Enterprize Way	2	Sydenham Road	3
Erlanger Road	2	Amersham Road	2
Grierson Road	2	Bartram Road	2
Honor Oak Park	2	Bromley Road	2
Rosenthal Road	2	Enterprize Way	2
Stanstead Road	2	Erlanger Road	2
Troutbeck Road	2	Erlanger Road	2
Verdant Lane	2	Fordel Road	2
Arran Road	1	Geoffrey Road	2
Avon Road	1	Grierson Road	2
Avondale Road	1	Lewisham High St	2
Belmont Hill	1	London Road	2
Bovill Road	1	Rosenthal Road	2
Boyne Road	1	Troutbeck Road	2
Brockley Rise	1	Verdant Lane	2
Bromley Road	1	Westdown Road	2
Brookmill Road	1	Arran Road	1
Burnt Ash Hill	1	Avon Road	1
Burnt Ash Road	1	Avondale Road	1
Canonbie Road	1	Bampton Road	1
Capstan Road	1	Barmeston Road	1
Carholme Road	1	Belmont Hill	1
Catling Close	1	Bovill Road	1
Chudleigh Road	1	Boyne Road	1
Clifton Rise	1	Brockley Rise	1
Cold Blow Lane	1	Brockley View	1
Cooper's Lane	1	Brookmill Road	1
Courthill Road	1	Brownhill Road	1
Cranfield Road	1	Burnt Ash Hill	1

Darthmouth Road	1	Burnt Ash Road	1
Devonshire Road	1	Camlan Road	1
Doggett Road	1	Canadian Ave	1
Farley Road	1	Canonbie Road	1
Faversham Road	1	Capstan Road	1
Florence Road	1	Carholme Road	1
Fordel Road	1	Catford Broadway	1
Gellatly Road	1	Catling Close	1
Geoffrey Road	1	Clifton Rise	1
Gilmore Road	1	Cobland Road	1
Glenwood Road	1	Cold Blow Lane	1
Gosterwood Street	1	Cooper's Lane	1
Greenland Mews	1	Courthill Road	1
Halesworth Road	1	Cranfield Road	1
Heather Road	1	Culverly Road	1
Hospital Way	1	Darthmouth Road	1
Lewisham High St	1	Deptford Church Street	1
Lewisham Park	1	Devonshire Road	1
Lewisham Road	1	Doggett Road	1
London Road	1	Ennersdale Road	1
Lucas Street	1	Farley Road	1
Malham Road	1	Faversham Road	1
Manor Avenue	1	Firhill Road	1
Manor Park Parade	1	Florence Road	1
Marler Road	1	Gellatly Road	1
Mayow Road	1	Gilmore Road	1
Montacute Road	1	Glenwood Road	1
Montem Road	1	Gosterwood Street	1
Morden Hill	1	Greenland Mews	1
Morley Road	1	Haddington Road	1
Mount Pleasant Road	1	Halesworth Road	1
Murillo Road	1	Havelock Walk	1
Musgrove Road	1	Hazeldon Road	1
Nettleton Road	1	Heather Road	1
Neuchatel Road	1	Hospital Way	1
Old Road	1	Kneller Road	1
Ommaney Road	1	Lewisham Park	1
Pattenden Road	1	Lewisham Road	1
Pearfield Road	1	Lucas Street	1
Ravensbourne Road	1	Malham Road	1
Sandhurst Road	1	Manor Avenue	1
Sevenoaks Road	1	Manor Park Parade	1
Shell Road	1	Marler Road	1
Silverdale Road	1	Mayow Road	1

South Park Crescent	1	Montacute Road	1
Springbank Road	1	Montem Road	1
Sunderland Road	1	Morden Hill	1
Tressillian Crescent	1	Morley Road	1
Tressillian Road	1	Mount Pleasant Road	1
Upper Brockley Road	1	Murillo Road	1
Vicars Hill	1	Musgrove Road	1
Waller Road	1	Nelson Mandela Road	1
Warwickshire Path	1	Nettleton Road	1
Westdown Road	1	Neuchatel Road	1
Winn Road	1	Newlands Park	1
		Old Road	1
		Ommaney Road	1
		Pattenden Road	1
		Pearfield Road	1
		Ravensbourne Park	1
		Ravensbourne Road	1
		Rushey Green	1
		Sandhurst Road	1
		Sangley Road	1
		Sevenoaks Road	1
		Shell Road	1
		Silverdale Road	1
		South Park Crescent	1
		Springbank Road	1
		Sunderland Road	1
		Tressillian Crescent	1
		Tressillian Road	1
		Upper Brockley Road	1
		Vicars Hill	1
		Waller Road	1
		Warwickshire Path	1
		Winn Road	1
		Winterstoke Road	1
		Wood Vale	1

Appendix 3:

Private Rented HMO 2015	Private Rented HMO 2018
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Road	No of HMO	Road	No of HMO
New Cross Road	26	New Cross Road	17
Lee High Road	18	Lee High Road	14
Bromley Road	15	Bromley Road	12
Brownhill Road	14	Pepys Road	10
Hither Green Lane	12	Sydenham Road	10
George Lane	11	Brockley Road	9
Sydenham Road	11	George Lane	9
Breakspears Road	10	Honor Oak Park	9
Pepys Road	9	Verdant Lane	9
Sanford Walk	9	Malpas Road	8
Brockley Road	8	Hither Green Lane	7
Hospital Way	8	Hospital Way	7
Jerningham Road	8	Brownhill Road	6
Malpas Road	8	Burnt Ash Hill	6
Rochdale Way	8	Catford Hill	6
Verdant Lane	8	Jerningham Road	6
Burnt Ash Hill	7	Muirkirk Road	6
Devonshire Road	7	Stanstead Road	6
Honour Oak Park	7	Barriedale	5
Lewisham High Street	6	Breakspears Road	5
Lewisham Way	6	Deptford High Street	5
Loring Road	6	Drakefell Road	5
Stanstead Road	6	Lewisham High Street	5
Waller Road	6	Loring Road	5
Wickham Road	6	Sandhurst Road	5
Barriedale	5	St Fillans Road	5
Bellingham Road	5	Wickham Road	5
Deptford High Street	5	Alloa Road	4
Downham Way	5	Baring Road	4
Drakefell Road	5	Bellingham Road	4
Elswick Road	5	Catford Broadway	4
Erlanger Road	5	Courthill Road	4
Muirkirk Road	5	Devonshire Road	4
Queen's Road	5	Downham Way	4
Rosenthal Road	5	Inchmery Road	4
Vesta Road	5	Laleham Road	4
Wells Park Road	5	Lewisham Way	4
Wildfell Road	5	Queens Road	4
Algernon Road	4	Sevenoaks Road	4
Baring Road	4	Spring Bank Road	4
Catford Broadway	4	Tranquil Vale	4
Catford Hill	4	Waller Road	4
Courthill Road	4	Wildfell Road	4

Crescent Way	4	Abinger Grove	3
Dacres Road	4	Algernon Road	3
Ermine Road	4	Avignon Road	3
Grove Street	4	Bence House	3
Halesworth Road	4	Bexhill Road	3
Inchmery Road	4	Bridge House	3
Kirkdale	4	Crescent Way	3
Laleham Road	4	Culverley Road	3
Marischal Road	4	Doggett Road	3
Murillo Road	4	Elswick Road	3
Perry Vale	4	Endwell Road	3
Sandhurst Road	4	Erlanger Road	3
Sevenoaks Road	4	Ermine Road	3
Shardeloes Road	4	Glenville Grove	3
Stondon Park	4	Grove Street	3
Tresillian Road	4	Halesworth Road	3
Trundleys Road	4	Holme Lacey Road	3
Woolstone Road	4	Joseph Hardcastle Close	3
Alloa Road	3	Kirkdale	3
Argnask Road	3	Lessing Street	3
Avignon Road	3	London Road	3
Bargery Road	3	Longton Avenue	3
Bartram Road	3	Marischal Road	3
Boyne Road	3	Murillo Road	3
Brookdale Road	3	Ommaney Road	3
Burghill Road	3	Overcliff Road	3
Campshill Road	3	Rainsborough Avenue	3
Chudleigh Road	3	Riverview Park	3
Clarendon Rise	3	Rushey Green	3
Davenport Road	3	Stondon Park	3
Doggett Road	3	The Woodlands	3
Endwell Road	3	Trundleys Road	3
Evelyn Street	3	Tyrwhitt Road	3
Joseph Hardcastle Close	3	Waldenshaw Road	3
Lessing Street	3	Whitefoot Lane	3
Lewisham Park	3	Wood Vale	3
Loampitt Hill	3	Woodyates Road	3
London Road	3	Woolstone Road	3
Longton Avenue	3	Ardgowan Road	2
Manor Avenue	3	Argosy House	2
Manwood Road	3	Arngask Road	2
Ommaney Road	3	Athelney Street	2
Ravensbourne Road	3	Bargery Road	2
Riverview Park	3	Bartram Road	2

Rushey Green	3	Beechfield Road	2
Southend Lane	3	Beecroft Road	2
Springbank Road	3	Blashford Street	2
St Asaph Road	3	Boone Street	2
St Donatts Road	3	Bovill Road	2
The Woodlands	3	Brockley Barge	2
Tyrwhitt Road	3	Brockley Rise	2
Undercliff Road	3	Camplin Street	2
Upper Brockley Road	3	Campshill Road	2
Waldenshaw Road	3	Chinbrook Road	2
Whitburn Road	3	Clarendon Rise	2
Whitefoot Lane	3	Colfe Road	2
Wood Vale	3	Cranfield Road	2
Abinger Grove	2	Darfield Road	2
Adolphus Street	2	Dartmouth Road	2
Alverton Street	2	Davenport Road	2
Ardogwan Road	2	Dressington Avenue	2
Arlington Close	2	Egmont Street	2
Avon Road	2	Elverson Road	2
Beecroft Road	2	Elwis House	2
Bell Green Lane	2	Engleheart Road	2
Belmont Park	2	Evelyn Street	2
Blackheath Rise	2	Fairlawn Mansions	2
Blashford Street	2	Felday Road	2
Bovill Road	2	Florence Road	2
Brockley Grove	2	Foxberry Road	2
Brockley Rise	2	Greenland Mews	2
Camplin Street	2	Hatcham Park Mews	2
Canadian Avenue	2	Hatfield Close	2
Canobie Road	2	Hazelbank Road	2
Carholme Road	2	Howson Road	2
Champion Road	2	Hyndewood	2
Churchdown Road	2	Killearn Road	2
Cranfield Road	2	Ladywell Road	2
Crofton Park Road	2	Lawrie Park Road	2
Culverley Road	2	Lewisham Park	2
Dalrymple Road	2	Lewisham Road	2
Darfield Road	2	Lindal Road	2
Dartmouth Road	2	Loampit Hill	2
Deals Gateway	2	Loampit Vale	2
Deptford Church Street	2	Ludwick Mews	2
Dressington Avenue	2	Manor Avenue	2
Egmont Street	2	Micheldever Road	2
Elfida Crescent	2	Milton Court Road	2

Elmer Road	2	Moorside Road	2
Elsiemaud Road	2	Morden Hill	2
Elverson Road	2	Nelgarde Road	2
Engleheart Road	2	Newlands Park	2
Ewhurst Road	2	Pendrell Road	2
Felday Road	2	Pentland House	2
Florence Road	2	Perry Hill	2
Fordmill	2	Perry Vale	2
Foxberry Road	2	Polecroft Lane	2
Friendly Street Mews	2	Rangefield Road	2
Gosterwood Street	2	Ravensbourne Road	2
Grangemill Road	2	Recreation Road	2
Greenland Mews	2	Riddons Road	2
Hatcham Park Road	2	Ringstead Road	2
Hatfield Close	2	Rolt Street	2
Hazelbank Road	2	Rosenthal Road	2
Hyndewood	2	Silvermere Road	2
Jodane Street	2	Southend Lane	2
Keedonwood Road	2	St Donatts Road	2
Killearn Road	2	Tressillian Road	2
Kilmorie Road	2	Troutbeck Road	2
Ladywell Road	2	Undercliff Road	2
Lawrie Park Road	2	Venner Road	2
Lethbridge Close	2	Walsham House	2
Lewisham Road	2	Wells Park Road	2
Lindal Road	2	Westbourne Drive	2
Loampit Vale	2	Ackroyd Road	1
Lochaber Road	2	Addey House	1
Lovelinch Close	2	Addington Grove	1
Ludwick Mews	2	Adolphus Street	1
Malham Road	2	Alanthus Close	1
Manor Park	2	Albacore Crescent	1
Marvels Lane	2	Albyn Road	1
Mayow Road	2	Algiers Road	1
Melrose Close	2	Allerford Road	1
Micheldever Road	2	Alverton Street	1
Milton Court Road	2	Amersham Grove	1
Moorside Road	2	Amersham Road	1
Morden Hill	2	Amyruth Road	1
Moremead Road	2	Ansford Road	1
Morley Road	2	Arabin Road	1
Nelgarde Road	2	Ardley Close	1
Newlands Park	2	Arica Road	1
Old Road	2	Arran Road	1

Overcliff Road	2	Balder Rise	1
Pascoe Road	2	Bamford Road	1
Penderry Rise	2	Bankhurst Road	1
Penerley Road	2	Bankwell Road	1
Perry Hill	2	Barnes House	1
Polecroft Lane	2	Barville Close	1
Rangefield Road	2	Batavia Mews	1
Ringstead Road	2	Bayes Close	1
Sandrock Road	2	Bearstead Rise	1
Shifford Path	2	Beck Close	1
Silvermere Road	2	Bedivere Road	1
Slaithwaite Road	2	Beech Close	1
St Fillans Road	2	Belgravia Gardens	1
St Germans Road	2	Belmont Hill	1
Troutbeck Road	2	Bishopsthorpe Road	1
Vancouver Road	2	Blackheath Rise	1
Venner Road	2	Boones Road	1
Ventnor Road	2	Boundfield Road	1
Waldram Park Road	2	Bousfield Road	1
Warwickshire Path	2	Boyne Road	1
Westbourne Drive	2	Brandram Road	1
Westwood Hill	2	Brangbourne Road	1
Wisteria Road	2	Braxfield Road	1
Woodyates Road	2	Broadfield Road	1
Ackroyd Road	1	Brocklehurst Street	1
Addington Grove	1	Brockley Cross	1
Albyn Road	1	Brockley Grove	1
Algiers Road	1	Brockley Hall Road	1
Allerford Road	1	Brockley View	1
Amblecote Road	1	Burghill Road	1
Amersham Grove	1	Burnt Ash Road	1
Amersham Road	1	Bush Road	1
Amyruth Road	1	Canadian Avenue	1
Arabin Road	1	Capstone Road	1
Ardley Close	1	Carholme Road	1
Ardoch Road	1	Casella Road	1
Arica Road	1	Castlands Road	1
Arran Road	1	Champion Road	1
Ashby Road	1	Charleville Circus	1
Athelney Street	1	Church Rise	1
Balder Rise	1	Churchdown	1
Bamford Road	1	Clayhill Crescent	1
Bankhurst Road	1	Cliff Terrace	1
Bankwell Road	1	Cliffview Road	1

Barville Close	1	Cobbsthorpe Villas	1
Batavia Mews	1	Cold Blow Lane	1
Batavia Road	1	College Park Close	1
Bayes Close	1	Columbine Way	1
Beadnell Road	1	Comerford Road	1
Bearstead Rise	1	Concorde Way	1
Beckenham Hill Road	1	Conisborough Crescent	1
Bedivere Road	1	Coopers Lane	1
Beech Close	1	Corona Road	1
Beechfield Road	1	Crantock Road	1
Belmont Hill	1	Creekside	1
Bexhill Road	1	Cricketers Walk	1
Bird in Hand Mews	1	Croft Street	1
Bishopsthorpe Road	1	Crofton Park Road	1
Blessington Road	1	Crutchley Road	1
Blythe Vale	1	Czar Street	1
Boone Street	1	Dallinger Road	1
Boones Road	1	Dalrymple Road	1
Boundfield Road	1	Danescombe	1
Bousfield Road	1	Datchet Road	1
Brangbourne Road	1	Davenport House	1
Braxfield Road	1	Dene Close	1
Broadfield Road	1	Deptford Broadway	1
Brocklehurst Street	1	Douglas Way	1
Brockley Hall Road	1	Downderry Road	1
Brockley View	1	Drake Road	1
Brookbank Road	1	Dryfield Walk	1
Brookmill Road	1	Duncombe Hill	1
Burnt Ash Road	1	Dundalk Road	1
Bush Road	1	Dunfield Road	1
Calmont Road	1	Durnford House	1
Capstone Road	1	Dyneley Road	1
Carswell Road	1	Eastern Road	1
Casella Road	1	Ector Road	1
Castlands Road	1	Edric Road	1
Cedar House	1	Egmont Street	1
Charleville Circus	1	Elderton Road	1
Childeric Road	1	Elfrida Crescent	1
Church Rise	1	Elmer Road	1
Clare Road	1	Elmer Road	1
Clayhill Crescent	1	Elsiemaud Road	1
Cliff Terrace	1	Elsinor Road	1
Cliffview Road	1	Ericson House	1
Clifton Rise	1	Etta Street	1

Clowders Road	1	Evans Road	1
Cold Blow Lane	1	Evelina Road	1
Colfe Road	1	Evelyn Street	1
Columbine Way	1	Ewart Road	1
Comerford Road	1	Ewhurst Road	1
Concorde Way	1	Falkland House	1
Conington Road	1	Farley Road	1
Conisborough Crescent	1	Faversham Road	1
Coopers Lane	1	Finch House	1
Cordwell Road	1	Finland Road	1
Corona Road	1	Firhill Road	1
Crantock Road	1	Florence Terrace	1
Creekside	1	Fordmill Road	1
CroftStreet	1	Forestholve Close	1
Crutchley Road	1	Foxborough Gardens	1
Czar Street	1	Francemary Road	1
Dallinger Road	1	Frankham Street	1
Danescombe	1	Further Green Road	1
Datchet Road	1	Geoffrey Road	1
Daubney Tower	1	Gilmore Road	1
De Frene Road	1	Girton Road	1
Dene Close	1	Gladiator Street	1
Deptford Broadway	1	Glenfarg Road	1
Douglas Way	1	Gosterwood Street	1
Downderry Road	1	Grangemill Road	1
Drake Road	1	Granville Park	1
Dryfield Walk	1	Greystead Road	1
Duncombe Hill	1	Haddington Road	1
Dundalk Road	1	Harmon House	1
Dunfield Road	1	Hatcham Park Road	1
Dyneley Road	1	Hathway House	1
Eastdown Park	1	Havelock Walk	1
Eastern Road	1	Hawkins Way	1
Ector Road	1	Hazel Grove	1
Edward Place	1	Hazeldon Road	1
Elderton Road	1	Heathfield House	1
Eliot Bank	1	Henry Cooper Way	1
Ellerdale Street	1	Hexal Road	1
Etta Street	1	Highclere Street	1
Evelina Road	1	Highland Terrace	1
Ewart Road	1	Hillbrow Road	1
Excelsior Works	1	Homecroft Road	1
Exeter Way	1	Honley Road	1
Farley Road	1	Horsmonden Road	1

Finland Road	1	Iceland Wharf	1
Firhill Road	1	Idonia Street	1
Florence Terrace	1	Inglemere Road	1
Fordel Road	1	Iona Close	1
Foxborough Gardens	1	Kangley Bridge Road	1
Francemary Road	1	Keedonwood Road	1
Frankham Street	1	Kentwell Close	1
Frensbury Road	1	Knapmill Road	1
Further Green Road	1	Knowles Hill Crescent	1
Gaynesford Road	1	Lanier Road	1
Gellatly Road	1	Launcelot Road	1
Gibbon Road	1	Lawrie Park Gardens	1
Giffin Street	1	Leahurst Road	1
Gilmore Road	1	Lethbridge Close	1
Gladiator Street	1	Leylang Road	1
Glenfarg Road	1	Limes Grove	1
Glenville Grove	1	Littlebourne	1
Granville Park	1	Littlewood	1
Greystead Road	1	Lochaber Road	1
Haddington Road	1	Longhedge House	1
Hafton Road	1	Longhill Road	1
Handen Road	1	Lynch Walk	1
Hatcham Park Mews	1	Malham Road	1
Havelock Walk	1	Mallory Close	1
Hawkins Way	1	Malyons Road	1
Hazel Grove	1	Manor Park Parade	1
Henry Cooper Way	1	Manwood Road	1
Hexal Road	1	Margarets Road	1
High Level Drive	1	Marvels Lane	1
Highclere Street	1	Mayow Road	1
Hillbrow Road	1	Medusa Road	1
Hilly Fields Crescent	1	Melrose Close	1
Holme Lacey Road	1	Minard Road	1
Holmesley Road	1	Monk Terrace	1
Homecroft Road	1	Monson Road	1
Honley Road	1	Montacute Road	1
Horsmonden Road	1	Monument Gardens	1
Howson Road	1	Moremead Road	1
Hunsdon Road	1	Morley Road	1
Hurtsbourne Road	1	Musgrove Road	1
Idonia Street	1	Naomi Street	1
Inglemere Road	1	Nash Road	1
Iona Close	1	Nettleton Road	1
Jennifer Road	1	Nightingale Grove	1

John Williams Close	1	Northover	1
Jutland Road	1	Northwood Road	1
Kangley Bridge Road	1	Old Bromley Road	1
King Alfred Avenue	1	Old Kent Road	1
Kingfisher Mews	1	Oldstead Road	1
Knapmill Road	1	Otford House	1
Kneller Road	1	Otto Close	1
Knowles Hill Crescent	1	Pagnell Street	1
Lanier Road	1	Parbury Road	1
Lausanne Road	1	Parker Terrace	1
Lawn Terrace	1	Parkfield Road	1
Lawrie Park Gardens	1	Pasture Road	1
Le May Avenue	1	Paynell Ct	1
Leahurst Road	1	Peak Hill Gardens	1
Lewisham Hill	1	Penderry Rise	1
Leylang Road	1	Peters Path	1
Limes Grove	1	Pitfold Close	1
Littlewood	1	Poplar House	1
Longhill Road	1	Princethorpe Road	1
Longhurst Road	1	Radford Road	1
Longton Grove	1	Ravensbourne Park Crescent	1
Maylons Road	1	Raymond Close	1
Medhurst Drive	1	Reculver Road	1
Medusa Road	1	Reigate Road	1
Melfield Gardens	1	Reservoir Road	1
Millmark Grove	1	Romney Close	1
Minard Road	1	Round Hill	1
Monson Road	1	Royal Parade	1
Montacute Road	1	Ryecroft Road	1
Monument Gardens	1	Saltwood House	1
Mount Pleasant Road	1	Sandpit Road	1
Musgrove Road	1	Sandrock Road	1
Nash Road	1	Sangley Road	1
Nettleton Road	1	Saxton Close	1
Noel Terrace	1	Scawen Road	1
Northover	1	Sedgeway	1
Northwood Road	1	Selden Road	1
Old Kent Road	1	Selworthy Road	1
Oldstead Road	1	Shardelous Road	1
Oslac Road	1	Shell Road	1
Otto Close	1	Shifford Path	1
Pagnell Street	1	Shipman Road	1
Parbury Road	1	Shroffold Road	1
Park Close	1	Slaithwaite Road	1

Park Crescent	1	South Park Crescent	1
Park Rise Road	1	South Road	1
Parkfield Road	1	Southerngate Way	1
Pasture Road	1	Southview Road	1
Peak Hill Gardens	1	Sprules Road	1
Pincott Place	1	St Asaph Road	1
Pitfold Close	1	St Georges Parade	1
Plough Way	1	St Germans Road	1
Queensthorpe Road	1	St Swithuns Road	1
Radford Road	1	Strafford House	1
Rainsborough Avenue	1	Summerfield Street	1
Ravensbourne Park	1	Sunderland Road	1
Raymond Close	1	Sussex Mews	1
Recreation Road	1	Swallands Road	1
Reculver Road	1	Tack Mews	1
Reigate Road	1	Tanners Hill	1
Reservoir Road	1	Tarleton Gardens	1
Riddons Road	1	The Works	1
River House	1	Thornford Road	1
Rolt Street	1	Thornsbeach Road	1
Romney Close	1	Thriffwood	1
Ronver Road	1	Torridon Road	1
Round Hill	1	Tressillian Crescent	1
Royal Parade	1	Trundleys Terrace	1
Rutland Walk	1	Tyson Gardens	1
Ryecroft Road	1	Upper Brockley Road	1
Sandpit Road	1	Vancouver Road	1
Sangley Road	1	Ventnor Road	1
Saxton Close	1	Vicars Hill	1
Scawen Road	1	Warwickshire Path	1
Sedgeway	1	Water Lane	1
Shackleton Close	1	Wearside Road	1
Shearman Road	1	Westwood Hill	1
Shell Road	1	Whitburn Road	1
Shipman Road	1	Whitcher Close	1
Shorndean Street	1	Whitefoot Terrace	1
Shroffold Road	1	Wild Goose Drive	1
South Park Crescent	1	Winlaton Road	1
South Road	1	Winterbourne Road	1
Southerngate Way	1	Wisteria Road	1
Southview Road	1	Wittersham Road	1
Sportsbank Street	1	Woodbank Road	1
Sprules Road	1	Woodfield House	1
St Margarets Road	1	Woodham Road	1

St Mildreds Road	1	Woodland Mews	1
St Swithuns Road	1		
Staunton Street	1		
Stoney Croft Close	1		
Summerfield Street	1		
Sunderland Road	1		
Sussex Mews	1		
Swallands Road	1		
Sydenham Park	1		
Tack Mews	1		
Tanners Hill	1		
Tarleton Gardens	1		
Taymount Rise	1		
Thomas Dinwiddy Road	1		
Thornford Road	1		
Thornsbeach Road	1		
Thriffwood	1		
Tranquil Vale	1		
Tressilian Crescent	1		
Trundleys Terrace	1		
Turnham Road	1		
Valentine Court	1		
Vicars Hill	1		
Walsham Road	1		
Water Lane	1		
Wearside Road	1		
Wellmeadow Road	1		
Whitcher Close	1		
Whitefoot Terrace	1		
Wild Goose Drive	1		
Windlass Place	1		
Winlaton Road	1		
Winterbourne Road	1		
Wittersham Road	1		
Woodham Road	1		

Appendix 4:

HMO enforcement cases 2012-2015		HMO enforcement cases 2016-2017	
Road	No of HMOs	Road	No of HMO
New Cross Road	11	Bampton Road	2
Pepys Road	9	Boundfield Road	2
Lee High Road	8	Castillon Road	2
Alloa Road	7	Knapmill Road	2
Trundleys Road	6	Waters Road	2
Evelyn Street	5	Adolf Street	1
Hither Green Lane	5	Allerford Road	1
Queens Road	5	Alloa Road	1
Scawen Road	5	Arcus Road	1
Plough Way	4	Battersby Road	1
Shardeloes Road	4	Breakspears Road	1
Bellingham Road	3	Bromley Road	1
Breakspears Road	3	Brownhill Road	1
Drakefell Road	3	College Park Close	1
Grove Street	3	Crutchley Road	1
Jerningham Road	3	Davenport Road	1
Lewisham Way	3	Eastdown Park	1
St Donatts Road	3	Erlanger Road	1
Sydenham Road	3	Farley Road	1
Amersham Road	2	Firhill Road	1
Baring Road	2	Halesworth Road	1
Bartram Road	2	Hawstead Road	1
Brockley Road	2	Hazelbank Road	1
Deptford High Street	2	Horncastle Road	1
Enterprize Way	2	Lewisham Way	1
Enterprize Way	2	Marischal Road	1
Erlanger Road	2	Ringmore Rise	1
Grierson Road	2	Whitefoot Lane	1
Honor Oak Park	2		
Rosenthal Road	2		
Stanstead Road	2		
Troutbeck Road	2		
Verdant Lane	2		
Arran Road	1		
Avon Road	1		
Avondale Road	1		
Belmont Hill	1		
Bovill Road	1		
Boyne Road	1		
Brockley Rise	1		
Bromley Road	1		

Brookmill Road	1
Burnt Ash Hill	1
Burnt Ash Road	1
Canonbie Road	1
Capstan Road	1
Carholme Road	1
Catling Close	1
Chudleigh Road	1
Clifton Rise	1
Cold Blow Lane	1
Cooper's Lane	1
Courthill Road	1
Cranfield Road	1
Darthmouth Road	1
Devonshire Road	1
Doggett Road	1
Farley Road	1
Faversham Road	1
Florence Road	1
Fordel Road	1
Gellatly Road	1
Geoffrey Road	1
Gilmore Road	1
Glenwood Road	1
Gosterwood Street	1
Greenland Mews	1
Halesworth Road	1
Heather Road	1
Hospital Way	1
Lewisham High St	1
Lewisham Park	1
Lewisham Road	1
London Road	1
Lucas Street	1
Malham Road	1
Manor Avenue	1
Manor Park Parade	1
Marler Road	1
Mayow Road	1
Montacute Road	1
Montem Road	1
Morden Hill	1
Morley Road	1
Mount Pleasant Road	1

Murillo Road	1
Musgrove Road	1
Nettleton Road	1
Neuchatel Road	1
Old Road	1
Ommaney Road	1
Pattenden Road	1
Pearfield Road	1
Ravensbourne Road	1
Sandhurst Road	1
Sevenoaks Road	1
Shell Road	1
Silverdale Road	1
South Park Crescent	1
Springbank Road	1
Sunderland Road	1
Tressillian Crescent	1
Tressillian Road	1
Upper Brockley Road	1
Vicars Hill	1
Waller Road	1
Warwickshire Path	1
Westdown Road	1
Winn Road	1

Appendix 5:

HMO identified by Benefits Data 2016		HMO identified by Benefits Data 2018	
Road	No of HMO	Road	No of HMO
Boundfield Road	3	Firhill Road	5
Adolf Street	2	Playgreen Way	5
Brookehowse Road	2	Waters Road	5
Catford Hill	2	Boundfield Road	4
Firhill Road	2	Castillon Road	4
Ghent Street	2	Longhill Road	4
Longhill Road	2	Brookehowse Road	3
Oak Cottage Close	2	Catford Hill	3
Stanstead Road	2	Athelney Street	2
Waters Road	2	Elfrida Crescent	2
Athelney Road	1	Fifield Path	2
Castillon Road	1	Ghent Street	2
Cordwell Road	1	Hither Green Lane	2
Elfrida Crescent	1	Oak Cottage Close	2
Fordmill Road	1	Randlesdown Road	2
Grangemill Road	1	Adolf Street	1
Hither Green Lane	1	Ardley Close	1
Lee High Road	1	Cordwell Road	1
Longdown Road	1	Crutchley Road	1
Overdown Road	1	Fordmill Road	1
Playgreen Way	1	Grangemill Road	1
Randlesdown Road	1	King Alfred Avenue	1
Riddons Road	1	Knapmill Road	1
South Park Crescent	1	Lee High Road	1
Southend Lane	1	Longdown Road	1
Swallands Road	1	Mount Pleasant Road	1
		New Cross Road	1
		Overdown Road	1
		Riddons Road	1
		South Park Crescent	1
		Southend Lane	1
		Stanstead Road	1
		Swallands Road	1
		Tanstead Road	1
		Whitefoot Lane	1

**ARTICLE 4 DIRECTION FOR LEWISHAM'S SOUTHERN WARDS OF BELLINGHAM,
DOWNHAM, WHITEFOOT AND GROVE PARK**

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)
(ENGLAND) ORDER 2015**

DIRECTION MADE UNDER ARTICLE 4(1)

WHEREAS THE LONDON BOROUGH OF LEWISHAM being the appropriate local planning authority within the meaning of article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended ("the Order") is satisfied that it is expedient that development of the descriptions set out in the First Schedule below should not be carried out on the land shown edged red (for identification purposes only) on the Plan in the Second Schedule unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 (as amended)

NOW THEREFORE the said Council in pursuance of the power conferred on it by article 4(1) of the Order hereby directs that the permission granted by Article 3 of the Order shall not apply to development on the said land of the descriptions set out in the First Schedule below

This Direction shall come into force on (date one year after date of making direction)
if confirmed

FIRST SCHEDULE

In respect of the Land described in the Second Schedule:

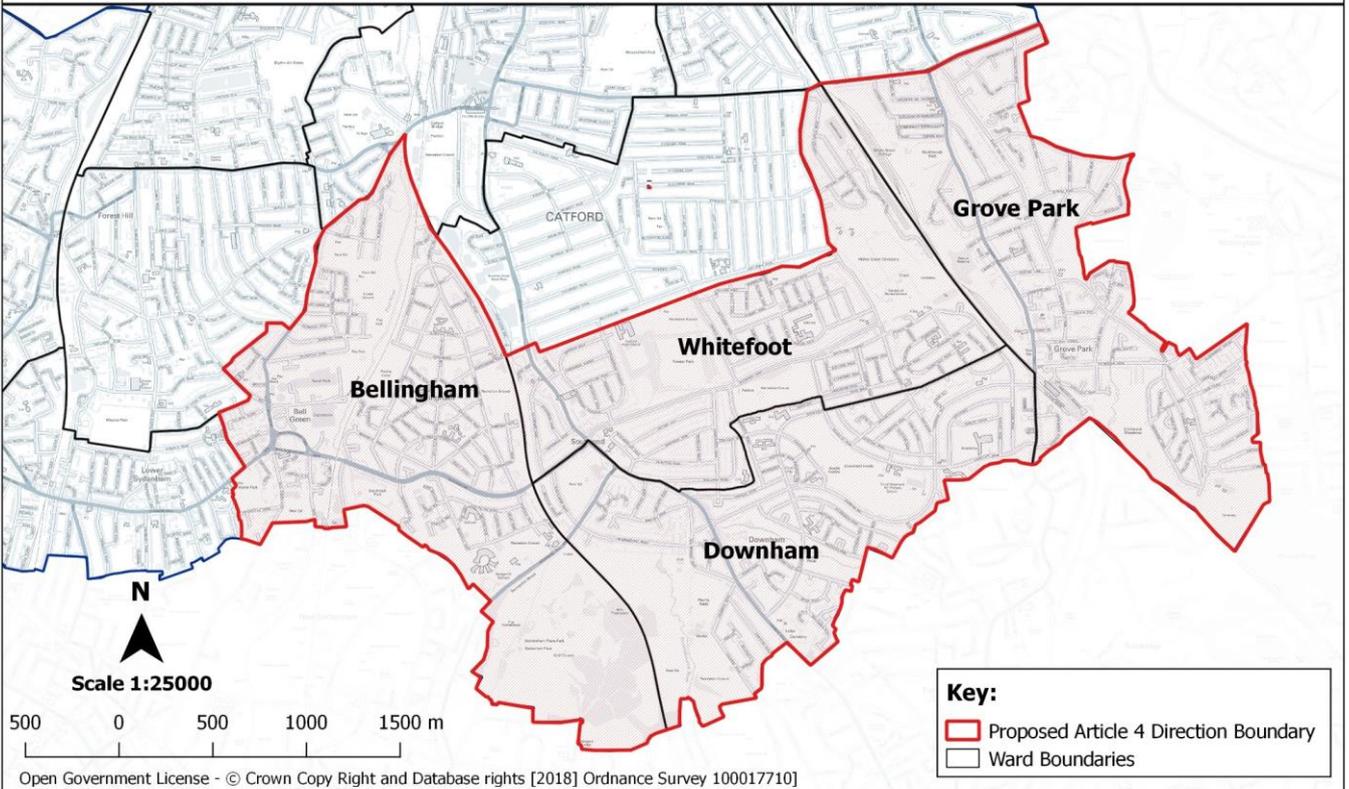
Schedule 2 Part 3 of the Order – Changes of Use

1. Class L. ***Development consisting of a change of use of a building***

(b) from a use falling within Class C3 (dwellinghouses) of the Schedule to the Use Classes Order, to a use falling within Class C4 (houses in multiple occupation) of that Schedule.

SECOND SCHEDULE

Area covered by Article 4 Direction



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Date: November 2018
Author: Strategic Planning Team

London Borough of Lewisham 

Made under the COMMON SEAL OF)
THE MAYOR AND BURGESSES OF THE)
LONDON BOROUGH OF LEWISHAM)

On

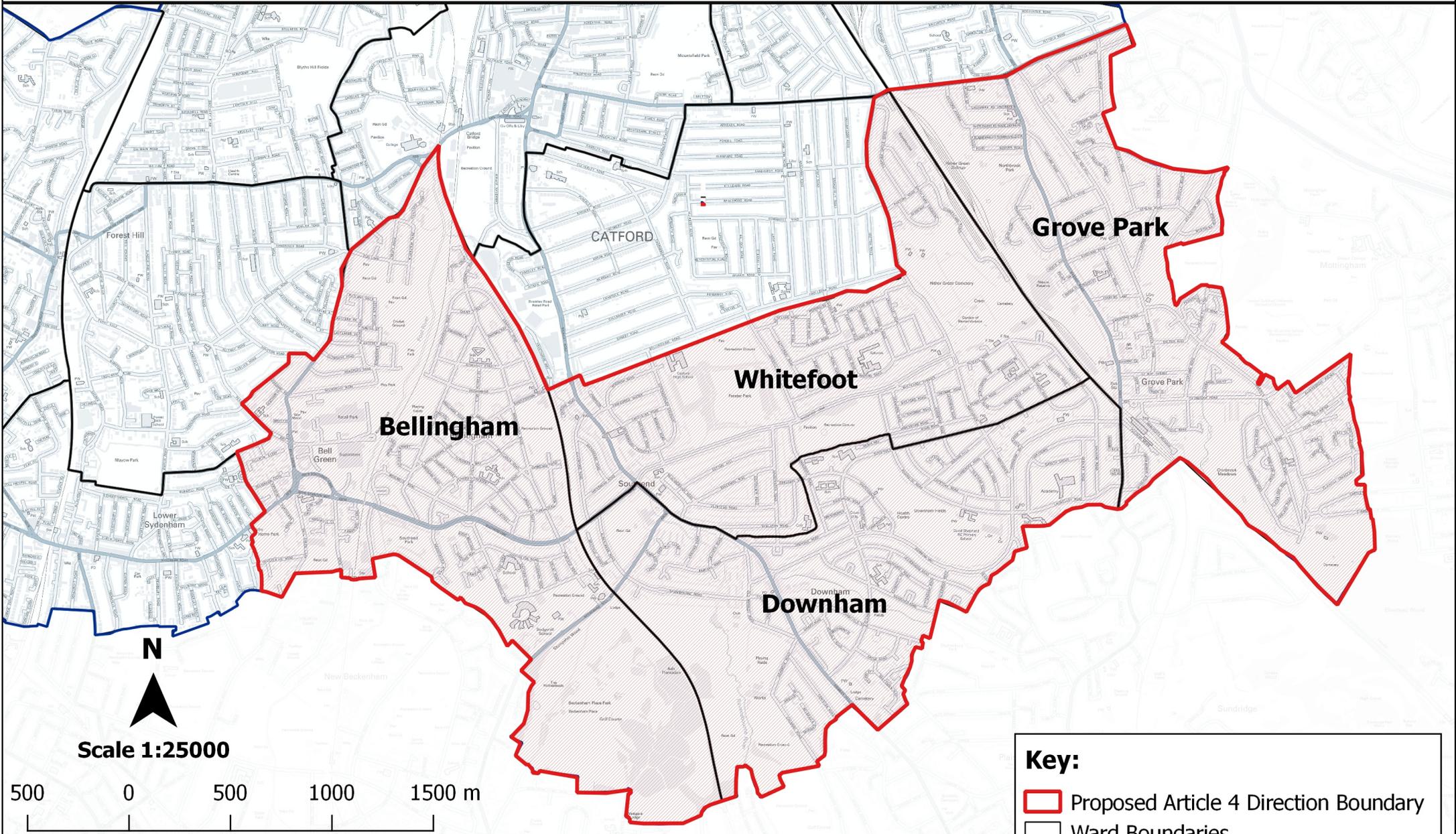
In the presence of:-

Confirmed under THE COMMON SEAL OF)
THE MAYOR AND BURGESSES OF THE)
LONDON BOROUGH OF LEWISHAM)

ON

In the presence of:-

Area covered by Article 4 Direction



Key:

-  Proposed Article 4 Direction Boundary
-  Ward Boundaries

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Date: November 2018
Author: Strategic Planning Team

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DRAFT

Strategic Environmental Assessment (SEA) Screening Assessment

Article 4 Direction for Lewisham's southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4)

Prepared by:
London Borough of Lewisham

For consultation with statutory consultants

05 December 2018

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3.0	Scope	3
4.0	Assessment of Environmental Effects	4
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1 Introduction

- 1.1 This Screening Assessment report has been prepared to determine whether a Strategic Environmental Assessment (SEA) is required for the use of an Article 4 Direction for Lewisham's southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4), in line with the Strategic Environmental Assessment Directive (Directive 2001/42/EC), transposed into law by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 1.2 Recognising that the Article 4 Direction will withdraw permitted development rights and require planning permission to be sought in accordance with our development plan unless material considerations indicate otherwise, the council is required to consider whether the Article 4 Direction has the potential to result in significant environmental effects, particularly where such effects may not have already been assessed during the preparation of the council's statutory Development Plan.
- 1.3 This Screening Report has been prepared in accordance with Regulation 9 of the SEA Regulations 2004.
- 1.4 This is a draft screening assessment for consultation with the prescribed statutory consultation bodies. A final determination will be published by the council having regard to all representations received.

2 Scope of the Article 4 Direction

- 2.1 The proposed Article 4 Direction will cover Lewisham's Southern wards of Bellingham, Downham, Whitefoot and Grove Park and withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4).
- 2.2 The making of an Article 4 Direction is considered to be in compliance with the NPPF and would enable the Council to better manage the impact of small HMO's within the boroughs southern wards.

3 SEA Screening Procedure

3.1 The SEA screening procedure generally comprises of 6 stages, as detailed below:

1. Preliminary Assessment: to determine whether screening is necessary;
2. Assessment of likely Environmental Effects: if screening is required the an assessment of the likely environmental effects, including any significant effects, will be undertaken in accordance with the SEA Regulations 2004;
3. Draft Screening Report: a draft screening report will be prepared summarising the results of Stage 2 and including a draft determination as to whether the SPD is likely to have significant environmental effects;
4. Consultation with statutory bodies.
5. Final Screening Report: consideration to be given to the responses from the three statutory bodies and then a final version of the screening report prepared confirming:
 - a. The result of the screening;
 - b. Responses from the consultation bodies;
 - c. The final determination, and
 - d. The statement of reasons if no SEA is required
6. Final Screening Report made publically available: the Council will issue the Final Screening Report to each of the three statutory consultees and make it publicly available for inspection.

3.2 This is the stage 3 report, with the current consultation being stage 4.

4 Assessment of Environmental Effects

4.1 The council, as the “responsible authority”, must determine whether the plan or programme (in this case, the use of an Article 4 Direction) is likely to have significant environmental effects. The criteria for determining the significance of effects are set out in Schedule 1 of the SEA Regulations 2004, which are set out in the Table 4.1 below. The proposal has been assessed against each of these criteria and the results are also detailed in Table 4.1.

Table 4.1 - SEA Screening Assessment

SEA Directive Criteria		Assessment	Likely Significant Effects?
1. Characteristics of the plan or programme			
(a)	the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>It is not considered that this programme will significantly influence or set the framework for other projects or activities. The Article 4 Direction is not a statutory development plan document or a strategic plan, and does not set a framework for allocating resources.</p> <p>The proposed Article 4 Direction is a targeted intervention focussed on a discreet area, which will help give effect to the adopted spatial development strategy for the borough.</p>	No
(b)	the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The National Planning Policy Framework (NPPF) 2018 paragraph 53 states that.</p> <p><i>The use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities).</i></p> <p>The HMO review Nov 2018 demonstrates a change in the spatial distribution of HMOs with a significant increase and clustering of HMOs within the boroughs southern wards.</p> <p>These southern wards which have</p>	No

		<p>traditionally had the lowest proportion of HMO's in the borough are unsuitable locations for high concentrations of HMO's due to their:</p> <ul style="list-style-type: none"> • High levels of deprivation • Poor public transport accessibility • Suburban character with a high concentration of family homes <p>Within these wards numerous properties within recent years have been extended and then converted to a small HMO using permitted development rights.</p> <p>The making of an Article 4 Direction is considered to be in compliance with the NPPF and would enable the Council to better manage the impact of small HMO's within the boroughs southern wards.</p> <p>It is important to note that an Article 4 Direction merely removes the permitted development right, it does not remove the right of a person to make an application for planning permission to carry out the development.</p> <p>In Lewisham's case, the development plan includes the London Plan, the Core Strategy, the Development Management Plan, the Site Allocations Plan and the Lewisham town centre Local Plan.</p>	
(c)	<p>the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;</p>	<p>The use of an Article 4 Direction will help ensure that the impact of small HMO's within the boroughs southern wards are better managed.</p> <p>And that HMOs are in appropriate, sustainable locations in line with DM Policy 6 Houses in multiple occupation (HMO) as part of a balanced mix of housing.</p> <p>The relevant policies relating to Homes in Multiple Occupation (HMOs) in the Lewisham Development Management Plan are</p>	No

		<p>policy DM Policy 6 Houses in multiple occupation (HMO)</p> <p><i>1. The Council will only consider the provision of new Houses in Multiple Occupation where they:</i></p> <ul style="list-style-type: none"> <i>a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher</i> <i>b. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood</i> <i>c. do not result in the loss of existing larger housing suitable for family occupation, and</i> <i>d. satisfy the housing space standards outlined in DM Policy 32.</i> <p><i>2. The Council will resist the loss of good quality Houses in Multiple Occupation.</i></p> <p><i>The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.</i></p>	
(d)	environmental problems relevant to the plan or programme;	It is not anticipated that any environmental problems will be introduced or intensified as a result of the proposed Article 4 Direction.	No
(e)	the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	<p>The concentration of HMOs in inappropriate locations can often lead to negative impacts.</p> <p>Guidance produced by DCLG, Housing in Multiple Occupation and possible planning response (2008) noted the following negative impacts that can be experienced in such circumstances:</p> <ul style="list-style-type: none"> • anti-social behaviour, noise and nuisance; • imbalanced and unsustainable communities; • negative impacts on the physical 	No

		<p>environment and streetscape;</p> <ul style="list-style-type: none"> • pressures upon parking provision; • increased crime; • growth in private rented sector at the expense of owner-occupation; • pressure upon local community facilities and restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population. <p>The making of an Article 4 Direction would enable the Council to better manage the impact of small HMO's within the boroughs southern wards.</p>	
2. Characteristics of the effects and of the area likely to be affected			
(a)	the probability, duration, frequency and reversibility of the effects,	The impact of the Article 4 is likely to be overwhelmingly positive, with the document having the potential to have positive impacts in the short, medium and longer term.	No
(b)	the cumulative nature of the effects	<p>Once in place the Article 4 Direction will be relevant to all properties that fall within the proposed area, and only where an application for a change of use to a small HMO is made.</p> <p>The Article 4 Direction will enable the council to better manage the impact of small HMO's within the area and is expected to have a positive cumulative impact, however these are not considered to result in likely significant environmental effects.</p>	No
(c)	the trans-boundary nature of the effects of the SPD	There are no trans-boundary effects anticipated from the proposed Article 4 Direction.	No
(d)	the risks to human health or the environment (for example, due to accidents)	HMOs are most frequently occupied by low income, transient people. The proposal for an Article 4 Direction will assist in delivering better quality HMOs and regulate their concentration improving the living conditions for occupants and those	No

		<p>nearby.</p> <p>There are no anticipated risks to human health or the environment.</p>	
(e)	<p>the magnitude and spatial extent of the effects</p> <p>(geographical area and size of the population likely to be affected),</p>	<p>The proposed Article 4 Direction will cover four wards (1006ha in size) and an estimated population of 62,550.</p> <p>The extent of the Article 4 Direction is limited to a contained local area, and it is not considered to be significant in the wider context of the borough and sub-region; the proposal is not considered to result in likely significant environmental effects.</p>	No
(f)	<p>the value and vulnerability of the area likely to be affected due to:</p> <p>i) special natural characteristics or cultural heritage</p> <p>ii) exceeded environmental quality standards or limit</p>	<p>The majority of the area does not contain any significant special natural characteristics or statutory designated heritage assets.</p> <p>There are a number of Sites of Importance Nature Conservation (SINC) and also Metropolitan Open Land (MOL). The Article 4 Direction is not expected to have any significant impact on these assets.</p>	No
(g)	<p>the effects on areas or landscapes which have a recognised national, Community or international protection status</p>	<p>There are a number of Sites of Importance Nature Conservation (SINC) and also Metropolitan Open Land (MOL). The Article 4 Direction is not expected to have any significant impact on these assets.</p>	No

5 Draft Determination

- 5.1 The screening assessment detailed in table 4.1 indicates that the use of an Article 4 Direction for Lewisham's southern wards of Bellingham, Downham, Whitefoot and Grove Park to withdraw permitted development rights for the change of use from dwelling house (Use Class C3) to small HMO's (Use Class C4), will not result in any significant environmental impacts. It is noted that the SEA Regulations 2004 do not specify the nature of effects (i.e. positive or negative) that would give rise to a full SEA. However, this assessment has identified that the Article 4 Direction is unlikely to generate significant environmental effects by itself, and there are no negative effects on the environment anticipated. The spatial extent of the Article 4 is limited to a contained area of the borough, and will enable the council to better manage the impact of small HMO's within this area.
- 5.2 Any effects resulting from higher tier planning documents including the 'parent policies' relevant to HMOs have already been considered and assessed by a separate full SEA through the Development Plan process.
- 5.3 The Article 4 Direction does not propose any new policies, or the amendment of existing policies, and will not allocate resources or direct other higher level plans and programmes.
- 5.4 In conclusion, the draft determination is that a SEA will not be required.

Next Stage

- 5.5 The draft determination is that a SEA will not be required for the Article 4 Direction. However, before a final determination is made it will be necessary to:
- 1 Consult on this draft determination with statutory consultees
 - 2 Prepare a final screening report, which is to be made publicly available.

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Housing Select Committee		
Title	Homelessness Reduction Act: progress update	
Wards	All	
Contributor	Executive Director for Customer Services	Item: 5
Class	Part 1 (open)	17 December 2018

1 Purpose

- 1.1 This report provides an update to Housing Select Committee following the introduction of the Homelessness Reduction Act (HRAAct) in April of this year.
- 1.2 The report provides an overview of the HRAAct and the changes that it has brought to the homelessness services provided by the council, including a summary of the impact on the numbers of households being assisted by Lewisham Council.
- 1.3 The report also provides an update to members on the progress being made linked to our work as a Trailblazer borough, having received additional funding from the Government to tackle homelessness.

2 Recommendations

- 2.1 It is recommended that Housing Select Committee note the contents of the report

3 Background and context

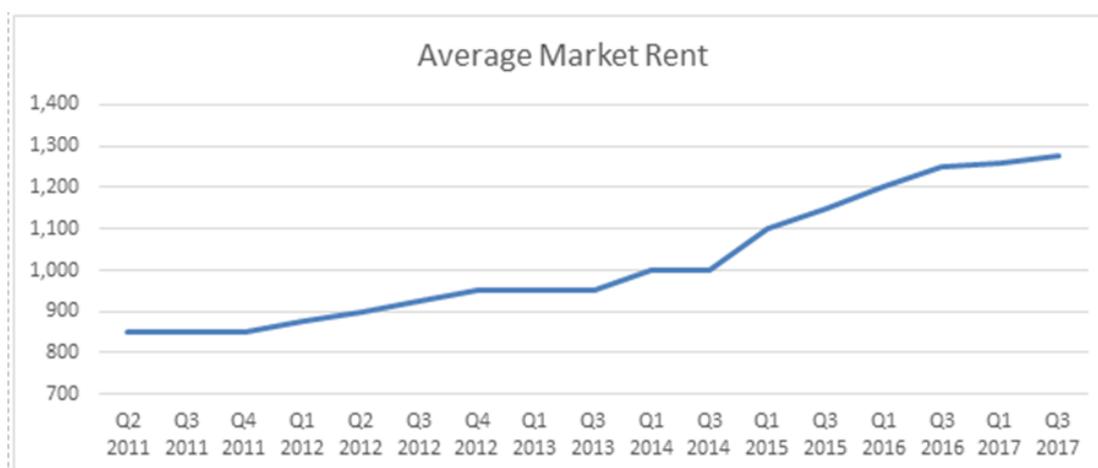
- 3.1 There were almost 80,000 households in Temporary Accommodation across England at the end of March 2018. This represents a 44% increase since March 2013 when there were slightly over 55,000 households in Temporary Accommodation.
- 3.2 Over 54,500 households were in Temporary Accommodation arranged by London Boroughs at the end of March 2018, almost 70% of the total number of placements across the country. The number of households placed by London Boroughs has increased by 36% since March 2013.
- 3.3 The number of Homeless acceptances has remained broadly stable during the past 5 years. Between 52,000 and 59,000 homeless acceptances were made every year between 2012/13 and 2017/18, in London this was between 15,000 and slightly over 19,000 acceptances.
- 3.4 In recent years, the loss of an Assured Shorthold Tenancy has become the most prevalent reason for Homelessness across England, but especially in London.
- 3.5 27% of households accepted as Homeless in England in 2017/18 had become homeless due to the termination of an Assured Shorthold Tenancy, rising to 31% of all acceptances in London. This is a slight decrease from a high point in 2015/16 when 40% of all acceptances were due to the termination of an AST, but is considerably above historic rates.

- 3.6 Following the introduction of the Housing (Wales) Act 2014 which compels Welsh authorities to assist those threatened with homelessness at an early point and to assist any homeless person to find accommodation amongst other changes, a private members bill sponsored by Bob Blackman MP was brought to parliament with a view to achieving similar changes in England.
- 3.7 The Homelessness Reduction Bill was supported by numerous organisations and by the Government, and received royal assent in April 2017 and came into force as the Homelessness Reduction Act on the 3rd April 2018. The act represents the most significant change in Homelessness legislation in a generation.

4 Homelessness in Lewisham

- 4.1 Across London a number of factors including Welfare Reform, a lack of new affordable properties and the increasing cost of housing have all had a substantial impact in the increase in Homelessness since 2010.
- 4.2 The cost of housing in Lewisham has become unaffordable for many. House prices in Lewisham increased 82% between June 2011 and April 2018, and market rents increased by 50% between 2011 and the end of 2017, as shown in graph 1.

Graph 1: Average Market Rent in Lewisham



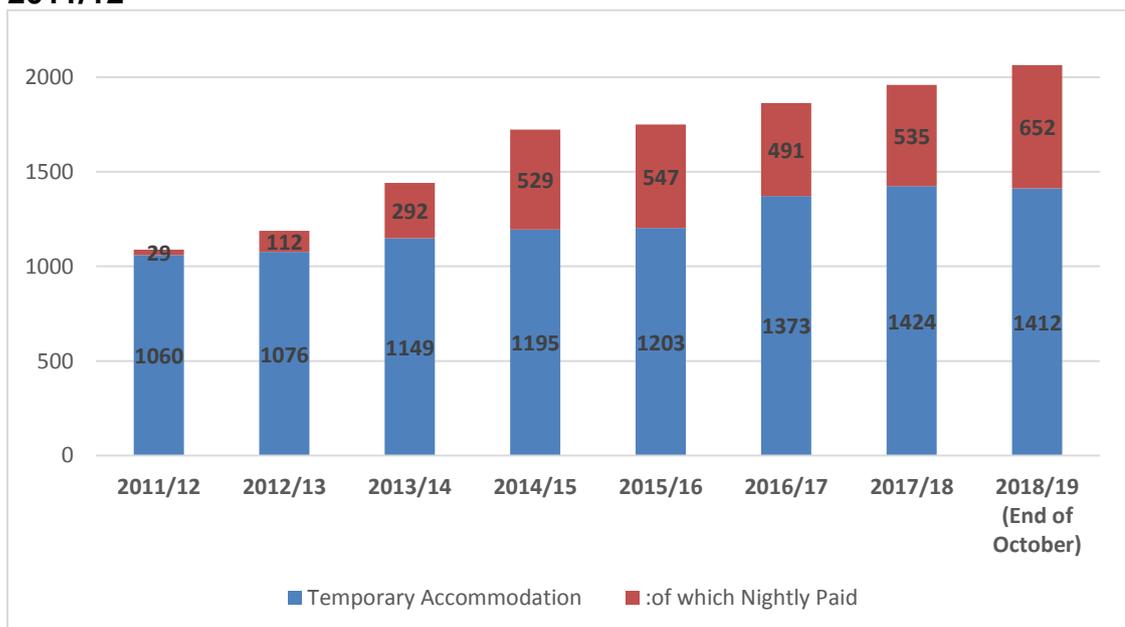
- 4.3 The government increased the Local Housing Allowance (LHA) rates in parts of Lewisham from the start of April 2018 to reflect the rapid increase in rental costs since the LHA freeze was introduced. However, there remains a significant shortfall between the LHA rate applicable in Inner South East London, which most of Lewisham is covered by, and the median market rent in the borough, as shown in chart 1.

Chart 1: Local Housing Allowance and Shortfall to Median Market Rent



- 4.4 Since 2013/14 the main reason for homelessness in Lewisham has been the loss of rented accommodation, largely as a consequence of the termination of an Assured Shorthold Tenancy (AST). In 2015/16 and 2016/17 this represented over 50% of all homelessness acceptances in the borough.
- 4.5 Between 2010/11 and 2017/18 there was a 45% decrease in the number of lets available to households on the Housing Register and a 110% increase in the number of households in Temporary Accommodation. 2,064 households were in temporary accommodation as at the end of October 2018, almost double the number of lets that were available during the course of the previous year. The changes since 2011/12 are shown in chart 2 below. The lack of affordable alternative forms of Temporary Accommodation mean this has largely been realised as an increase in Nightly Paid over this period. The recent increase in the use of Nightly Paid accommodation is explored further in the section on the impacts of the HRA Act.

Chart 2: Numbers in Temporary Accommodation & Nightly Paid since 2011/12



- 4.6 As a consequence of this rapid increase in the number of households in Temporary Accommodation there has been a rapid rise in costs. Gross expenditure on Temporary Accommodation has increased by 178% since 2010/11, and was almost £25m in 2017/18. Net expenditure, which is largely the result of the increased usage of Nightly Paid accommodation at rates above the LHA cap, increased by 23% over the same period and was almost £2.3m in 2017/18.
- 4.7 A wide ranging approach has been developed to mitigate and minimise costs, including but not limited to an expansion of the Temporary Accommodation portfolio to reduce the need for Nightly Paid accommodation, a renewed focus on prevention and relief activity and Pan-London work to regulate the costs of Temporary Accommodation.
- 4.8 The Council is also joining Capital Letters, a Pan-London approach to procurement of homes which seeks to make use of various available funding strands and the increased LHA that private properties attract to source accommodation for authorities to utilise as an alternative to Temporary Accommodation. Recruitment and setup for Capital Letters will commence in early 2019 with a launch by the summer.
- 4.9 Monitoring through the London Inter-Borough Accommodation Agreement (IBAA) shows that over 1,600 Temporary Accommodation placements were made into Lewisham during 2017/18, of which almost 500 placements were made by the Council. Other boroughs that made a significant number of placements in Lewisham were Southwark, Bromley and Lambeth.

5 The Homelessness Reduction Act

- 5.1 The HRAct has expanded the duties of the Local Authority in regard to the prevention and relief of homelessness. This includes providing a free, comprehensive advice and information service to all who approach including all of the following:
- Advice on preventing Homelessness.
 - Advice on the rights of those that are homeless or threatened with homelessness.
 - Advice on securing accommodation when homeless, in some instances the Council will be responsible for providing temporary accommodation in such instance.
 - Advice on the duties of local authorities, help that may be available for the household either within the authority or elsewhere, and how to access that help.
- 5.2 Central to the act are changes that require authorities to undertake more extensive activity to prevent or relieve homelessness for a longer period of time. The period within which a household may be considered at risk of homelessness has been extended to 56 days from 28 days, and includes any household that has been served a section 21 notice regardless of expiry date, and the local authority now acts under the 'prevention' and 'relief' duties.

- 5.3 The local authority has a legal duty to act under the prevention duty when an applicant is threatened with homelessness and is eligible. The authority must proactively work with eligible households for 56 days, or longer where appropriate, working to try and ensure that the applicant does not become homeless. Some example activities undertaken under the prevention duty include but are not limited to:
- Liaising with the Landlord/Family member the applicant currently resides with to support the applicant to remain in their existing home.
 - Working with the household to identify and source affordable alternative accommodation.
 - Referrals to appropriate alternative services that may assist the household to remain in their existing accommodation or to find alternative accommodation.
- 5.4 The relief duty is applicable where an eligible household is homeless. The Local Authority must take reasonable steps to help the applicant secure accommodation that is available for at least six months. There is a 56 day period in which the authority has a legal duty to proactively work to relieve homelessness. 'Help to secure' does not mean that the authority has to source and provide accommodation, but that it should try to agree reasonable steps for itself and the applicant which could result in accommodation being found.
- 5.5 Where a household is deemed to not be co-operating with the steps required of them in their personal housing plan, the prevention and relief duty can be discharged before the 56 day period has elapsed. Where a household is deemed to be unintentionally homeless and in priority need, they are required to be given a final offer of accommodation in this instance.
- 5.6 The HRA Act does not change the main housing duty, except in instances of non-co-operation as mentioned above. Authorities will still owe the main housing duty to those who are unintentionally homeless, and in priority need. This would apply after the relief duty has come to an end in appropriate cases.
- 5.7 The prevention and relief duty outlined above are applicable to all eligible households. Receipt of assistance under these duties are not dependent on determining priority need or unintentionality.
- 5.8 Authorities are required to provide detailed assessments and personalised housing plans that capture the circumstances that led to homelessness or the threat of homelessness, what the applicant needs and what would be suitable, whether the applicant needs support to obtain and sustain their accommodation and actions that the authority and the applicant will take to prevent or relieve their homelessness.
- 5.9 A duty to refer also came into force on the 1st October 2018, requiring certain named public bodies to refer households that are homeless or at risk of homelessness to the appropriate local authority for support as per the above.

- 5.10 To support the implementation of the Act, £72.7m of funding was announced by the Government covering the three year period up to and including 2019/20. The Government envisage that the savings delivered from an expanded prevention and relief offer and a reduction in presentations will be self-sustaining, and no further funding is currently on offer past 2019/20.
- 5.11 Lewisham will receive £1.24m of funding over the three year period as part of the above settlement, London boroughs in total will receive £30.2m. However, modelling undertaken by London Councils indicates that the Act will cost at least £77m in London alone in its first year.
- 5.12 To support the service in meeting the requirements of the act, 8 new staff have been recruited across the Housing Solutions service with the funding allocated by the Government. The remaining funding will be used to complement and improve our existing IT solution, and on other work to enhance and support the ability of the team to deliver against the act.

6 The impact of the HRAct

- 6.1 To support the implementation of the act, Lewisham has worked closely with homeless households and external partners to develop a bespoke personal housing plan that captures the information required under the act in a way that works most effectively for the household.
- 6.2 A customer facing portal has been acquired that allows households to access their case remotely, reducing the need for households to come into the office to make minor changes or provide documentation, and changes have been made to council systems to accommodate these new requirements.
- 6.3 In line with Southwark, who trialled the legislation during 2017/18, interviews have been found to take twice as long under the new legislation. Appointments are now booked in for two hours where previously they would be booked in for one hour. The substantive reason for this increase is the extensive data gathering requirement of the H-CLIC return, which has replaced the P1E as the statutory return to government with regards to local authority activity under Homelessness legislation.
- 6.4 The 56 day prevention duty and 56 day relief duty mean that a smaller number of decisions have been made with regards to the main housing duty in the year to date than in comparative periods. This is because a decision cannot be effected until these duties have elapsed, as authorities will be working extensively with households during these periods to prevent or relieve homelessness.
- 6.5 To enable the service to understand demand following the implementation of the act, modelling has been developed that takes account for the above, and includes reasonable assumptions regarding the likely acceptance rate based on the acceptance rate in previous years for the same cohort.
- 6.6 It is envisaged that circa 930 decisions would be made accounting for this time lag, of these approximately 630 households would be accepted as homeless.

- 6.7 The modelling indicates that circa 1,060 decisions would be made during the course of the year without accounting for the aforementioned time lag. Of these approximately 730 households would be accepted as homeless.
- 6.8 This represents a decrease in the number of decisions made compared to recent years. 1,310 decisions were made in 2016/17 and 1,147 decisions were made in 2017/18.
- 6.9 Between 2013/14 and 2016/17 the Council accepted between 710 and 770 households as homeless per annum. In 2017/18 this decreased to slightly over 600. Whilst the current projection for 2018/19 is higher than the acceptance rate in 2017/18, this reflects a return to a similar pattern that was seen over the previous 4 years.
- 6.10 The increased acceptance rate observed following the implementation of the Act and an increase in the number of single applicants who are eligible for temporary accommodation has led to a sharp increase in the number of households in Nightly Paid accommodation.
- 6.11 At the end of October 2018 there were 652 households in Nightly Paid accommodation. As at the end of March 2018 there were 532 households in Nightly Paid accommodation. Following the implementation of the act there has been an increase of 76% in the number of single households in Nightly Paid accommodation, where the number of families in Nightly Paid accommodation has increased much more gradually over this period.
- 6.12 As at the end of October 2018, staff had a caseload of over 1,200 applicants. Of these slightly over 60 had not yet been accepted as being owed the prevention duty but were being worked with, almost 700 were owed the prevention duty and 500 were owed the relief duty.
- 6.13 This caseload is being managed by 19 Housing Solutions Officers working directly with households across SHiP and HOC. An additional 8 members of staff are being recruited to ensure more manageable caseloads across the service and extensive work is being undertaken via the Trailblazer programme to transform the service in line with the changes introduced by the HRAct, as detailed in section 7 of the report.
- 6.14 The Council has also formed a partnership with Crisis. Crisis is working alongside 5 local councils to help implement the HRAct, and more broadly with other councils and stakeholders to share learning and expertise. Lewisham is one of these Councils, which allows staff to learn from other authorities, share best practice and receive valuable input from staff at Crisis.

7 Lewisham as a Trailblazer borough

- 7.1 The Council was awarded almost £1m of Trailblazer funding from MHCLG to develop innovative ways to prevent homelessness. Every Lewisham household should have a stable and affordable home where they feel safe, so that they can be healthy, independent and in charge of their own futures.
- 7.2 The Trailblazer programme aims to increase the number of successful homelessness preventions, so households have access to stable and affordable homes. The programme contains a number of work strands to achieve this: service change including staff development, partnerships and messaging, early intervention and prevention, and data analytics.
- 7.3 The culture change and staff development has focused on changing the skills used in interviews with clients to create collaborative conversations. These conversations form the basis of clients' Personal Housing and Wellbeing Plans, which outlines the steps both the client and the Council will take to prevent or relieve homelessness.
- 7.4 To encourage clients to have the confidence to self-help, the borough trained all of the frontline housing solutions officers in motivational interviewing and coaching techniques. Officers are using these techniques during assessments to provide clients with the opportunity to reflect on their own abilities and how these can be used to resolve their housing issues. All staff within Strategic Housing have also attended training provided by Mary Gobar International, focussing on putting the customer at the centre of all activity. The housing needs team is now taking part in an innovative forum theatre training package by Cardboard Citizens designed to further develop these skills and make using them standard practice.
- 7.5 The management team are monitoring how successfully these skills are used through regular practice observations of a sample of interviews. The team are currently averaging a score of 78% in terms of how well motivational interviewing skills are used in assessments - this marks a considerable change as these skills were previously unused. This is reflective of the ongoing impact of the training and staff development that has been undertaken to transform the service to meet the demands of the act.
- 7.6 The partnerships and messaging work includes reviewing the information, advice and guidance provided via leaflets and webpages, and working with partners to provide households at risk of homelessness with a consistent message. Meetings are taking place with partners so they are aware of the way the Housing Needs service is changing the way it works. This includes conversations about early identification of people may face homelessness, advice they're provided with and the new duty to refer.
- 7.7 From 1 October 2018, the Homelessness Reduction Act places some organisations under a duty to refer to a local housing authority where they consider that one of their service users may be homeless or at risk of homelessness, and agrees to the referral. The Housing Needs service is taking this as an opportunity to develop better working relationships with partners so the people of Lewisham get the same, useful information when they face homelessness and are signposted to the right services at the right time.

The following services are listed in the regulations as public authorities with a duty to refer:

- prisons (public and contracted out)
- youth offender institutions and youth offending teams
- secure training centres (public and contracted out) and colleges
- probation services (community rehabilitation companies and national probation service)
- jobcentre plus
- accident and emergency services provided in a hospital
- urgent treatment centres, and hospitals in their capacity of providing in-patient treatment
- social service authorities.
- The Ministry of Defence in relation to members of the Royal Navy, the Royal Marines, the regular army and the Royal Air Force.

The service is also engaging with partners that are not subject to the so-called 'duty to refer', such as organisations in our voluntary and community sector and GPs, as these partners will naturally also encounter families and individuals facing homelessness.

- 7.8 A new approach to prevention of homelessness has been developed under the Trailblazer Programme by focusing on employment. Housing Needs has set up an employment project with the JobCentre to support households who are at risk of homelessness or already homeless to find employment or training opportunities. A small project team with officers across the Council and including two Employment Advisors are working with two cohorts of clients; both households affected by the benefit cap as well as those who have approached the Council's Housing Needs service for assistance. So far 117 households have worked with the service: 16 clients are now in vocational or upskilling training to lead to employment, and 17 clients have moved into work. One person supported into work had been unemployed for over 6 years and 3 people had been unemployed for more than 10 years. These households will also be supported to find stable and affordable accommodation where they feel safe, with households having a better opportunity to find a home that suits their needs due to their increased income.
- 7.9 The Council is also embarking on an ambitious analytical project using Council data to explore the reasons for homelessness in Lewisham. This work will inform a risk model to be deployed by the Council to enable the service to identify households at risk of homelessness, and deploy preventative tools, at the earliest possible opportunity.
- 7.8 In the coming months, the programme is developing the way the service gets feedback from its customers and learns from their comments learn to ultimately deliver services that work better for them. The front-door of the service (webpages, call centre and walk-in service) is also being reviewed by looking at whether these access point provide a good service to customers and whether they are a good use of staff time.

8 Financial implications

- 8.1 This report provides an update to Housing Select Committee following the introduction of the Homelessness Reduction Act (HRA) in April 2018 and as such, there are no direct financial implications arising from this report.

9 Legal implications

9.1 This report provides an update to Housing Select Committee following the introduction of the Homelessness Reduction Act (HRAct) in April 2018. The main duties imposed by the Homelessness Reduction Act are laid out in section 5 of this report. There are no further legal implications arising from this report.

10 Crime and disorder implications

10.1 There are no crime and disorder implications arising from this report.

11 Equalities implications

11.1 This report provides an update to Housing Select Committee following the introduction of the Homelessness Reduction Act (HRAct) in April 2018 and as such, there are no direct equalities implications arising from this report.

12 Environmental implications

12.1 There are no environmental implications arising from this report.

13 Background Documents and Report Originator

13.1 If you have any queries relating to this report please contact Rachel Dunn on 020 8314 6713.

Housing Select Committee			
Report Title	New Homes Programme	Item No	8
Contributors	Head of Strategic Housing		
Class	Part 1	Date	November 2018

1. Purpose of paper:

- 1.1. This report provides an update on progress of the delivery of the 500 new homes in the New Homes, Better Places programme and the broad strategy for the delivery of a further 1,000 new social homes.

2. Recommendations:

- 2.1. It is recommended that Housing Select Committee review and note the report.

3. Background:

- 3.1. The Lewisham Housing Strategy 2015-2020 contains four priorities:

- Helping residents at times of severe and urgent housing need
- Building the homes our residents need
- Greater security and quality for private renters
- Supporting our residents to be safe, healthy and independent in their home

- 3.2. London faces one of the most significant housing shortages since the end of the Second World War. In line with our strategy priorities, Lewisham Council acknowledges the challenges faced by our residents and is committed to tackling those with the greatest housing need.

- 3.3. In July 2012 the Council embarked on a programme to build 500 new social homes in response to a series of on-going housing policy and delivery challenges, most notably an enduring under-supply of new affordable homes available to the Council to meet housing demand.

- 3.4. A series of update reports has subsequently been considered by both Mayor and Cabinet, and Housing Select Committee, outlining progress in meeting the target of starting 500 new Council homes for social rent in 2018.

- 3.5. The Council has set a target of a further 1000 social homes by 2022.

4. New Homes update

Edward Street

- 4.1 On 1st November 2018, the Council's proposed development at Edward Street was granted planning permission.
- 4.2 This application will provide 34 new homes for use as temporary accommodation for homeless households on the site of a former ball court which is currently underutilised and in a poor state of repair.
- 4.3 As well as providing new temporary accommodation units, Edward Street will all provide new community/commercial spaces on the ground floor to benefit the local community. The final uses will be established through further consultation with local people, but based on the engagement that has taken place so far officers are investigating the provision of space for a community nursery, and affordable office space that can be targeted at small business, start-ups and the voluntary sector.
- 4.4 The development is one of four modular scheme to come forward following on from the success of PLACE/Ladywell. This is widely considered an exemplar scheme that provided new housing units for 20 per cent lower cost than other new build projects in the programme, in approximately two thirds of the standard construction time.

Building Council Homes for Londoners Bid

- 4.5. In September, a paper was noted by the Housing Select Committee that enabled officers to progress with submission of a bid to the Greater London Authority (GLA) for grant funding and to central Government for additional Housing Revenue Account (HRA) borrowing to enable the direct delivery of new council homes.
- 4.6. It has now been confirmed that the Council was successfully awarded £37.7m in grant funding for 384 dwellings.
- 4.7. Whilst this is around £20m less than originally bid, the shortfall can be made up out of Right to Buy receipts, section 106 payments and additional HRA borrowing, meaning that there should be no significant impact to the new build programme. The GLA have commended officers on the strength of the bid, noting that our per unit grant rate (just over £98k unit) is one of the highest in London.
- 4.8. It should also be noted that in recent weeks, the Government has confirmed that the HRA cap has been lifted for all boroughs. Officers are looking at the implications and potential opportunities that this may facilitate with regard to the new build programme.

5. Financial implications:

- 5.1 The Council's current 30 year financial model for the Housing Revenue Account (HRA) includes provision for up to 500 new units, for social rent purposes, at an average cost of £190k each (adjusted annually for inflation) over the first 10 years of the model.
- 5.2 The delivery of the HRA Social Units from the New Homes Better Places programme will be funded from this provision.
- 5.3 The delivery of the Temporary Accommodation schemes, such as Edward Street, will be funded through the use of RTB 1-4-1 receipts and General Fund Prudential Borrowing.
- 5.4 Work continues on the identification and financial impacts of the individual sites associated to the delivery of the new 1,000 additional homes target.
- 5.5 The final funding allocation, under the Building Council Homes for Londoners programme, has been confirmed as £37.7m from the GLA to support the provision of an additional 384 dwellings. The difference between the original grant application of £57.5m and the final allocation of £37.7m will be made up from the use of retained RTB 1-4-1 receipts.
- 5.6 The government has also announced the abolition of the HRA borrowing caps with effect from 29th December 2018. Future HRA borrowing will now be assessed under the Prudential Borrowing regime.
- 5.7 The financial implications of the schemes associated with the 1,000 homes programme will be reported on individually as and when they are sufficiently developed and brought forward for approval by Mayor and Cabinet.

6. Legal implications:

- 6.1 The Council has a wide general power of competence under Section 1 of the Localism Act 2011 to do anything that individuals generally may do. The existence of the general power is not limited by the existence of any other power of the Council which (to any extent) overlaps the general power. The Council can therefore rely on this power to carry out housing development, to act in an "enabling" manner with other housing partners and to provide financial assistance to housing partners for the provision of new affordable housing. In accordance with General Consent A3.1.1 of The General Housing Consents 2013 the Council may dispose of dwelling houses on the open market at market value.
- 6.2 Some of the proposals set out in this report are at an early stage of development. Detailed specific legal implications will be set out in subsequent reports to Mayor & Cabinet. Section 105 of the Housing Act 1985 provides that the Council must consult with all secure tenants who are likely to be substantially affected by a matter of Housing Management. Section 105 specifies that a matter of Housing Management would include a new programme of maintenance, improvement or demolition or a matter which affects services or amenities provided to secure tenants and that such

consultation must inform secure tenants of the proposals and provide them with an opportunity to make their views known to the Council within a specified period. Section 105 further specifies that before making any decisions on the matter the Council must consider any representations from secure tenants arising from the consultation. Such consultation must therefore be up to date and relate to the development proposals in question.

- 6.3 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.4 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 6.5 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 9.3 above.
- 6.6 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 6.7 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>

<https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

7. Equalities implications

7.5. The provision of new social housing in the borough has a positive equalities impact. Households on the Council's Housing Register are more likely to have a protected characteristic than the wider population as access to the register is limited to those most in housing need.

8. Crime and Disorder implications

8.5. There are no crime and disorder implications arising directly from this report.

9. Environmental implications

9.5. Any environmental implications from the delivery of new homes are considered and addressed on a scheme by scheme basis through the design and planning process. There are therefore no additional environmental implications arising directly from this report.

For further information please contact Jeff Endean, Housing Strategy and Programmes Manager, on 020 8314 6213.

Project	Ward	Number of New Council Homes	Number of Council Home Residents	Next decision/stage	Target Planning Dates		Target Start on Site	Target Completion Dates
					Submission	Approval		
Completed schemes								
Mercator Road	Lewisham Central	6	28	Complete				
Slaithwaite Community Room	Lewisham Central	1	2	Complete				
Forman House	Telegraph Hill	2	6	Complete				
Angus Street	New Cross	1	5	Complete				
Dacre Park South - Phase 1	Blackheath	7	22	Complete				
PLACE/Ladywell	Ladywell	0	0	Complete				
Hamilton Lodge	Forest Hill	0	0	Complete				
Hazelhurst Court	Downham	60	120	Complete				
Wood Vale	Forest Hill	9	36	Complete				
Honor Oak Housing Office	Telegraph Hill	5	20	Complete				
SUBTOTAL		91	239					
Schemes on site								
Dacre Park South - Phase 2	Blackheath	18	73	On site				Jul-18
Forster House (Nuthatch House)	Whitefoot	24	74	On site				Feb-19
Woodbank	Whitefoot	4	18	On site				Mar-19
Longfield Crescent	Forest Hill	27	109	On site				Sep-18
Dacre Park North	Blackheath	5	20	On site				Mar-19
Camoshill Road	Lewisham Central	34	68	On site				Feb-19
<i>On-site subtotal</i>		112	362					
CUMULATIVE SUBTOTAL		203	601					
Schemes awaiting start on site								
Rawlinson House	Lewisham Central	1	2	Tenders to be issued			Sep-18	Jun-19
Kenton Court	Bellingham	25	96	Tenders to be issued			Dec-18	Dec-19
Hawke Tower	New Cross	1	2	Tenders to be issued			Sep-18	Jun-19
Somerville Estate Phase 1	Telegraph Hill	23	101	Tenders to be issued			Dec-18	Jun-20
Marnock Road	Crofton Park	6	30	Tenders to be issued			Sep-18	Dec-19
Pepus Housing Office	Evelyn	5	25	Tenders to be issued			Sep-18	Jun-19
Endwell Road	Telegraph Hill	9	37	Tenders to be issued			Sep-18	Dec-19
Grace Path	Sydenham	5	25	Tenders to be issued			Dec-18	Jun-19
Stanstead Road	Perry Vale	4	8	Tenders to be issued			Dec-18	Dec-19
Algernon Road	Ladywell	4	20	Tenders to be issued			Dec-18	Jun-20
Church Grove	Lewisham Central	5	26	Tenders to be issued			Dec-18	Dec-19
Mayfield	Lee	50	226	Tenders to be issued			Dec-18	Dec-19
Silverdale Hall	Sydenham	6	27	Tenders to be issued			Dec-18	Jun-19
Forest Estate	Forest Hill	17	71	Tenders to be issued			Dec-18	Jun-20
Edward Street	New Cross	34	158	Tenders to be issued			Dec-18	Jun-20
Home Park	Bellingham	31	115	Tenders to be issued			Dec-18	Dec-19
<i>Awaiting start subtotal</i>		226	625					
CUMULATIVE SUBTOTAL		429	1226					
Schemes awaiting planning consent								
Brasted Close	Sydenham	0	0	Planning decision		Jul-18	Dec-18	Dec-19
Bampton Estate	Perry Vale	50	100	Planning decision		Jul-18	Mar-19	Jun-20
Hillcrest Estate (High Level Drive)	Withdrawn							
<i>Awaiting planning subtotal</i>		50	100					
GRAND TOTAL		479	1326					

Housing Select Committee			
Title	Select Committee work programme		
Contributor	Scrutiny Manager	Item	9
Class	Part 1 (open)	17 December 2018	

1. Purpose

To advise Members of the proposed work programme for the 2018/19 municipal year and to decide on the agenda items for the next meeting.

2. Summary

- 2.1 At the beginning of the municipal year, each select committee drew up a draft work programme for submission to the Business Panel for consideration.
- 2.2 The Business Panel considered the proposed work programmes of each of the select committees on 24 July 2018 and agreed a co-ordinated overview and scrutiny work programme. However, the work programme can be reviewed at each Select Committee meeting so that Members are able to include urgent, high priority items and remove items that are no longer a priority.

3. Recommendations

3.1 The Committee is asked to:

- note the work plan attached at **Appendix B** and discuss any issues arising from the programme;
- specify the information and analysis required in the report for each item on the agenda for the next meeting, based on desired outcomes, so that officers are clear about what they need to provide;
- review all forthcoming key decisions, attached at **Appendix C**, and consider any items for further scrutiny;

4. The work programme

- 4.1 The work programme for 2018/19 was agreed at the Committee's meeting on 5 July 2018.
- 4.2 The Committee is asked to consider if any urgent issues have arisen that require scrutiny and if any existing items are no longer a priority and can be removed from the work programme. Before adding additional items, each item should be considered against agreed criteria.
- 4.3 The flow chart attached at **Appendix A** may help Members decide if proposed additional items should be added to the work programme. The Committee's work programme needs to be achievable in terms of the amount of meeting time available. If the Committee agrees to add additional item(s) because they are

urgent and high priority, Members will need to consider which medium/low priority item(s) should be removed in order to create sufficient capacity for the new item(s).

- 4.4 Items within each Select Committee work programme are linked to the Council's corporate priorities. Work is currently underway to develop a new corporate strategy, which will give corporate expression to the priorities of the new administration. Once developed, scrutiny work programmes can be adjusted to reflect the new corporate strategy and corporate priorities, if required. It is expected that the new strategy will be approved at full Council in November 2018.

5. The next meeting

- 5.1 The following reports are scheduled for the meeting on 31 January 2019:

Agenda item	Review type	Link to Corporate Priority	Priority
Proposed rent and service charge increases	Standard item	Decent homes for all	Medium
Lewisham Homelessness forum	Standard item	Decent homes for all	Medium
New Homes Programme	Standard item	Decent homes for all	Medium

- 5.2 The Committee is asked to specify the information and analysis it would like to see in the reports for these items, based on the outcomes the Committee would like to achieve, so that officers are clear about what they need to provide for the next meeting.

6. Financial Implications

There are no financial implications arising from this report.

7. Legal Implications

In accordance with the Council's Constitution, all scrutiny select committees must devise and submit a work programme to the Business Panel at the start of each municipal year.

8. Equalities Implications

- 8.1 The Equality Act 2010 brought together all previous equality legislation in England, Scotland and Wales. The Act included a new public sector equality duty, replacing the separate duties relating to race, disability and gender equality. The duty came into force on 6 April 2011. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 8.2 The Council must, in the exercise of its functions, have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between people who share a protected characteristic and those who do not.
- foster good relations between people who share a protected characteristic and those who do not.

8.3 There may be equalities implications arising from items on the work programme and all activities undertaken by the Select Committee will need to give due consideration to this.

9. Date of next meeting

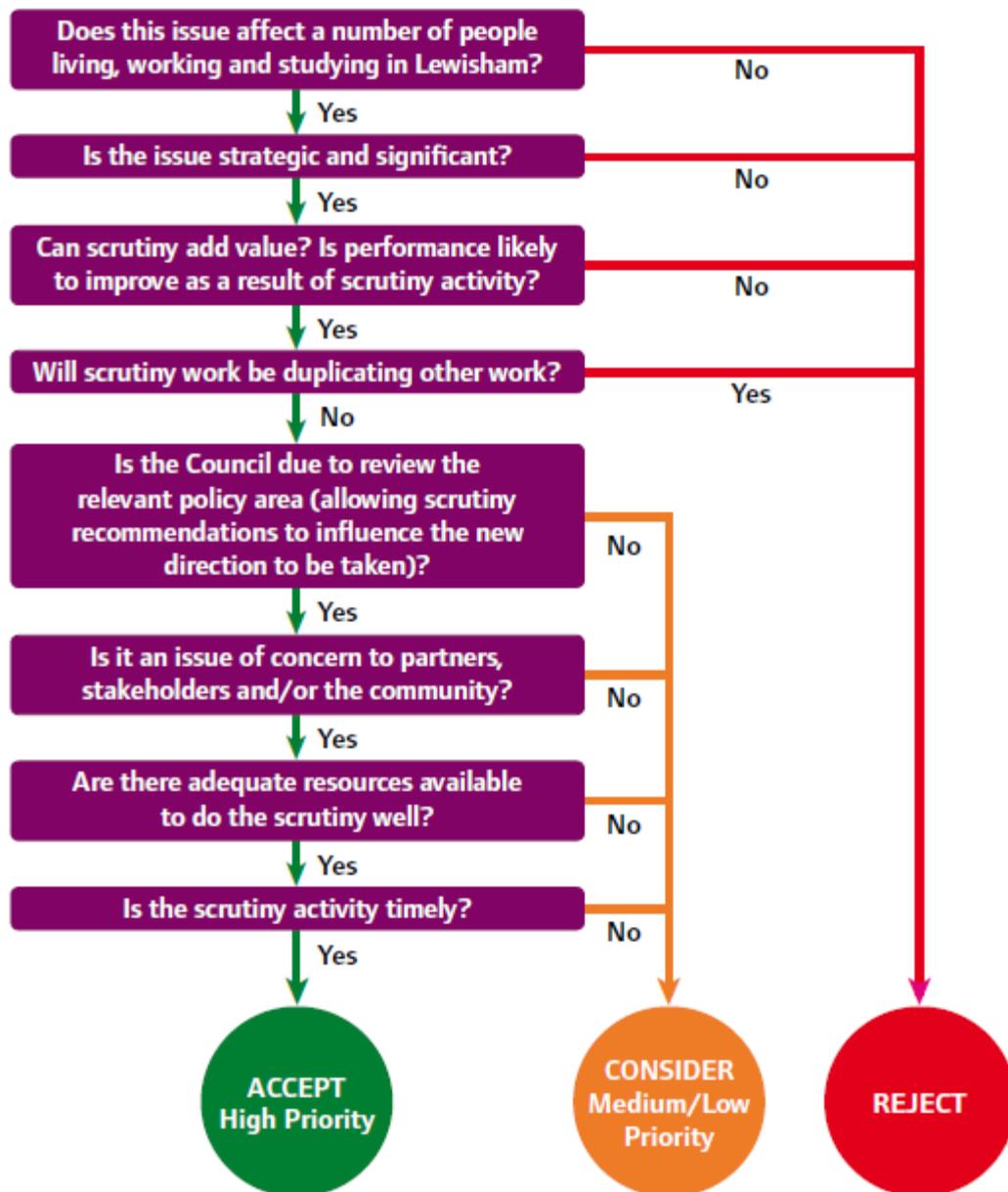
The date of the next meeting is Thursday 31 January 2019.

Background Documents

Lewisham Council's Constitution

Centre for Public Scrutiny: the Good Scrutiny Guide

Scrutiny work programme – prioritisation process



Housing Select Committee work programme 2018/19

Programme of work

Work item	Type of item	Priority	Strategic priority	Delivery deadline	05-Jul	18-Sep	31-Oct	17-Dec	31-Jan	06-Mar
Lewisham Future Programme	Standard item	High	CP6	Ongoing			Savings			
New Homes Programme	Standard item	Low	CP6	Ongoing						
Election of the Chair and Vice-Chair	Constitutional req	N/A	CP6	Jul						
Committee work programme 2018/19	Constitutional req	High	CP6	Jul						
Housing in Lewisham overview	Standard item	Low	CP6	Jul						
Lewisham Homes	Performance monitoring	Low	CP6	Jul	Annual report & business plan					
Brockley PFI	Performance monitoring	Low	CP6	Jul	Annual report & business plan					
Milford towers leasing arrangements	Standard item	High	CP6	Jul						
Landlord licensing	Standard item	High	CP6	Sep						
Capital Letters – Collaborative Part London Accommodation Procurement Initiative	Standard item	High	CP6	Sep						
Engaging residents on estate redevelopments	Standard item	Medium	CP6	Sep						
Building Council Homes for Londoners: Lewisham funding bid	Standard item	Medium	CP6	Sep						
Lewisham Homes business plan	Standard item	Medium	CP6	Oct						
Lewisham Local Plan	Standard item	Medium	CP6	Oct						
Housing Assistance Policy refresh	Standard item	Medium	CP6	Oct						
Lewisham HMO Review and Evidence Paper	Performance monitoring	Medium	CP6	Dec						
Fire safety in tall buildings	Performance monitoring	Medium	CP6	Dec						
Homelessness Reduction Act progress update	Performance monitoring	Medium	CP6	Dec						
Housing delivery models review update	Policy development	Medium	CP6	Dec				Update		
Proposed rent and service charge increases	Standard item	Low	CP6	Jan						
Housing and mental health review update	Policy development	Medium	CP6	Mar						
Proposals for private rented sector licensing in Lewisham	Standard item	High	CP6	Mar						
Lewisham's Housing Strategy	Policy development	High	CP6	Mar						
Annual lettings plan	Standard item	Low	CP6	Mar						

	Item completed
	Item ongoing
	Item outstanding
	Proposed timeframe
	Item added

Meeting Dates:					
1)	Thursday	5 July	4)	Monday	17 December
2)	Tuesday	18 September	5)	Thursday	31 January
3)	Wednesday	31 October	6)	Wednesday	6 March

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FORWARD PLAN OF KEY DECISIONS

Forward Plan December 2018 - March 2019

This Forward Plan sets out the key decisions the Council expects to take during the next four months.

Anyone wishing to make representations on a decision should submit them in writing as soon as possible to the relevant contact officer (shown as number (7) in the key overleaf). Any representations made less than 3 days before the meeting should be sent to Kevin Flaherty, the Local Democracy Officer, at the Council Offices or kevin.flaherty@lewisham.gov.uk. However the deadline will be 4pm on the working day prior to the meeting.

A "key decision"* means an executive decision which is likely to:

- (a) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates;
- (b) be significant in terms of its effects on communities living or working in an area comprising two or more wards.

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
October 2018	Budget Cuts	21/11/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Amanda De Ryk, Cabinet Member for Finance, Skills and Jobs (job share)		
August 2018	Cross Borough Procurement - Capital Letters	21/11/18 Mayor and Cabinet	Kevin Sheehan, Executive Director for Customer Services and Councillor Paul Bell, Cabinet Member for Housing		
May 2018	Lewisham Park CAA and Article 4 Direction	21/11/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and		
October 2018	Mental Health Voluntary Sector Integrated Advocacy Service Contract	21/11/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
October 2018	Mental Health Voluntary Sector Integrated Dementia Service Contract	21/11/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
October 2018	Mental Health Voluntary Sector Integrated Prevention and Recovery Service Contract	21/11/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best,		

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			Deputy Mayor		
October 2018	Care at Home: arrangements for integrating health and care services	21/11/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
October 2018	Neighbourhood CIL Strategy	21/11/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
October 2018	Main Grants Programme 2019 - 2023	21/11/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Jonathan Slater, Cabinet Member for Community Sector		
October 2018	Treasury Mid-Year Review 2018/19	21/11/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Amanda De Ryk, Cabinet Member for Finance, Skills and Jobs (job share)		
October 2018	Financial Forecasts	21/11/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Amanda De Ryk, Cabinet Member for Finance, Skills and Jobs (job share)		

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October 2018	Sydenham School Instrument of Government	21/11/18 Mayor and Cabinet	Sara Williams, Executive Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School Performance		
May 2018	Amendments to the Constitution	28/11/18 Council	Kath Nicholson, Head of Law and		
November 2018	Demolition Contract award for SEND School Expansion Projects	04/12/18 Overview and Scrutiny Education Business Panel	Janet Senior, Executive Director for Resources & Regeneration and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	Achilles Street Redevelopment Proposals Part 1 & 2	12/12/18 Mayor and Cabinet	Kevin Sheehan, Executive Director for Customer Services and Councillor Paul Bell, Cabinet Member for Housing		
August 2018	Ladywell Playtower Project Update and Approval of Changes to Original Proposal	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
October 2018	Housing Assistance Policy	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Paul Bell, Cabinet Member for		

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			Housing		
October 2018	Semi Independence Accommodation and Support Framework for Children's Social Care	12/12/18 Mayor and Cabinet	Sara Williams, Executive Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	Inward Investment Projects	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
August 2018	Council Tax Reduction - Consultation 2019-20	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Amanda De Ryk, Cabinet Member for Finance, Skills and Jobs (job share)		
October 2018	Provision of Homecare Services (Lead Provider) Extension of Contract	12/12/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
October 2018	Award of contracts Vulnerable Adults Assessment Service , Young Persons Specialist Service and Mental Health Specialist Service	12/12/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
October 2018	School Minor Works	12/12/18	Sara Williams, Executive		

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	Programme 2019/20	Mayor and Cabinet	Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	Parking Contract Extension and Proposed Floating Car Club Permit	12/12/18 Mayor and Cabinet	Kevin Sheehan, Executive Director for Customer Services and Councillor Brenda Dacres, Cabinet Member for Parks, Neighbourhoods and Transport (job share)		
October 2018	Lewisham Brownfield Land Register 2018	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
October 2018	Public Health cuts consultation outcome and proposals	12/12/18 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
November 2018	Corporate Strategy	12/12/18 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		
November 2018	Annual Complaints Report	12/12/18	Kevin Sheehan,		

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		Mayor and Cabinet	Executive Director for Customer Services and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		
November 2018	ACM Cladding Remediation Fund Approval	12/12/18 Mayor and Cabinet	Kevin Sheehan, Executive Director for Customer Services and Councillor Paul Bell, Cabinet Member for Housing		
November 2018	Award of a Printing Services Contract for the ICT Shared Service Authorities	12/12/18 Mayor and Cabinet	Kevin Sheehan, Executive Director for Customer Services and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		
October 2018	Planning Service Annual Monitoring Report (AMR) 2017-18	16/01/19 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
November 2018	Gambling Statement	16/01/19 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Joani Reid, Cabinet Member for Safer Communities		
November 2018	Adoption of Charter against Modern Slavery and Approval	16/01/19 Mayor and Cabinet	Aileen Buckton, Executive Director for		

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Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	of 1st Annual Modern Slavery and Human Trafficking Statement		Community Services and Councillor Joani Reid, Cabinet Member for Safer Communities		
November 2018	Adoption of Perry Vale and Christmas Estate Conservation Area Article 4 Direction and Conservation Area Appraisal	16/01/19 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
November 2018	Contract Award Carers Specialist Information Advice and Support Service	16/01/19 Mayor and Cabinet	Aileen Buckton, Executive Director for Community Services and Councillor Chris Best, Deputy Mayor		
May 2018	2 PCSA Contract Awards for Stage 1 of two SEND school expansion projects	16/01/19 Mayor and Cabinet	Sara Williams, Executive Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School Performance		
November 2018	Corporate Strategy	16/01/19 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		
August 2018	Council Tax Reduction - Consultation 2019-20	23/01/19 Council	Janet Senior, Executive Director for Resources & Regeneration and Councillor Joe Dromey,		

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			Cabinet Member for Finance, Skills and Jobs (job share)		
October 2018	Council Tax Base	23/01/19 Council	Janet Senior, Executive Director for Resources & Regeneration and Councillor Joe Dromey, Cabinet Member for Finance, Skills and Jobs (job share)		
November 2018	Neighbourhood CIL Strategy	23/01/19 Council	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		
October 2018	Greenvale expansion phase 1: demolition contract award report	29/01/19 Executive Director for Resources and Regeneration	Janet Senior, Executive Director for Resources & Regeneration and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	Chelwood Nursery Expansion	29/01/19 Executive Director for Resources and Regeneration	Janet Senior, Executive Director for Resources & Regeneration and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	Rockbourne Community Centre Refurbishment	29/01/19 Executive Director for Resources and	Janet Senior, Executive Director for Resources & Regeneration and		

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		Regeneration	Councillor Brenda Dacres, Cabinet Member for Parks, Neighbourhoods and Transport (job share)		
November 2018	Lewisham Transport Strategy and Local Implementation Plan 2019-2041	06/02/19 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Councillor Brenda Dacres, Cabinet Member for Parks, Neighbourhoods and Transport (job share)		
November 2018	Determined Admission Arrangements 2019-20	06/02/19 Mayor and Cabinet	Sara Williams, Executive Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School Performance		
October 2018	New Woodlands Remodelling Contract Award	19/02/19 Executive Director for Resources and Regeneration	Janet Senior, Executive Director for Resources & Regeneration and Councillor Chris Barnham, Cabinet Member for School Performance		
May 2018	Stillness School Kitchen and Dining Hall Contract	26/02/19 Executive Director for Children and Young People	Sara Williams, Executive Director, Children and Young People and Councillor Chris Barnham, Cabinet Member for School		

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			Performance		
November 2018	Annual Budget 2019-20	27/02/19 Council	Janet Senior, Executive Director for Resources & Regeneration and Councillor Joe Dromey, Cabinet Member for Finance, Skills and Jobs (job share)		
November 2018	Adoption of Charter against Modern Slavery and Approval of 1st Annual Modern Slavery and Human Trafficking Statement	27/02/19 Council	Aileen Buckton, Executive Director for Community Services and Councillor Joani Reid, Cabinet Member for Safer Communities		
August 2018	Lewisham Strategic Heat Network Business Case	13/03/19 Mayor and Cabinet	Janet Senior, Executive Director for Resources & Regeneration and Mayor Damien Egan, Mayor		

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