

London Borough of Lewisham – Period of Representation for Article 4 Direction on Small HMOs

Appendix 4 – Schedule of Representations

Consultation date 18/01/2023 – 01/03/2023

Consultation date 30/09/2022 – 05/12/2022 (Consultation null and void due to error in making the Article 4 Direction)

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**Table of Representations for consultation held
between 18/01/2023 and 01/03/2023**

Submission ref	Are you a resident of the London Borough of Lewisham? - Resident?	If you answered yes, which ward do you live in?	Are you a Landlord/ Occupier/Tenant?	What do you think about the proposed Article 4 Direction on Small HMOs for the remainder of the borough?	Any comments you would like to add?	Officer comment	Action
CS2301	Yes	Deptford	Tenant	Very Positive	N/A	Support noted	No action taken
CS2102	Yes	Perry Vale	Owner/Occupier	Very Positive	Restrictions should also apply on change of use from commercial GL residential, which is harming the character of the area and preventing public-facing commercial initiatives from proceeding.	Support noted	No action taken
CS2303	Yes	Lee Green	Owner/Occupier	Very Positive	N/A	Support noted	No action taken
CS2304	Yes	Ladywell	Owner/Occupier	Very Positive	Conversion of houses from C3 to C4 should definitely	Support noted	No action taken

					be subject to planning permission.		
CS2305	Yes	Evelyn	Tenant	Very Positive	<p>With the construction of multiple sites close to us - on Evelyn Street next to Deptford Green Primary School and on Grinstead Road & Trundleys Road - we in [REDACTED] are concerned for the extra pressure on infrastructure. Grove Medical has already increased staff and hours to improve its service but it can't expand further. Likewise, buses have recently been reduced in frequency and unless these new dwellings provide workspace for hybrid workers, I can almost foretell logistical chaos. As it is we sample</p>	<p>Support Noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p>	No action taken

					<p>this on a small scale in [REDACTED] where HMOs have popped up, mostly unapproved by Lewisham Council and often when these dwellings have been completed, there's little anyone seems to be able to do to get 'renovations' reversed. Many HMOs are rented to young professionals or students who most often don't own a vehicle but the impact of waste management, both refuse and drainage, is already having a serious impact on the stability of this small 56 house community. It's not that we don't want to embrace newcomers. On the contrary, we want them to have as</p>		
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					good a lifestyle as is possible and I don't see that this is possible if the percentage of living space per capita is consistently reduced by turning one-bedroom houses into HMOs.		
CS2306	Yes	Catford South	Owner/Occupier	Very Positive	N/A	Support noted	No action taken
CS2307	Yes	Catford South	Tenant	Very Positive	HMOs have always been a huge issue, from disturbances of peaceful environment to dumping rubbish everywhere around surrounding streets. Keeping the area and historical characteristics protected for peaceful families is a step in the right direction.	Support Noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	No action taken
CS2308	Yes	Catford South	Owner/Occupier	Very Positive	All HMO applications should be rejected for the	Support noted	No action taken

					<p>following reasons :-</p> <ol style="list-style-type: none"> 1. Multiple occupancy engenders conflict between tenants because individuals within a household have personal and conflicting intentions and responsibility. 2. The landlord, because he does not live within the same dwelling, is only really interested in the income it generates for himself. 3. The landlord is unlikely to be living in the same HMO premises so that he will not be bothered about the environmental state or noise pollution caused by the HMO residents. Such activity will only drive down the general condition of the area, as well as 	<p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The negative characterisation of residents who live in HMOs has not been considered.</p>	
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					<p>drive away conscientious residents, which will have a further downward affect on the upkeep of the area by future residents.</p> <p>4. Such tenants are only likely to be living in the area for a short period of time as they will move on to other areas for better housing or work reasons and thus will not be bothered on the presentation of the property.</p> <p>Furthermore, on moving out, the HMO residents are likely to further deteriorate the area by depositing unwanted furniture and bedding on street corners. Frequently there are beds and mattresses</p>		
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					discarded at the top of Daneby Road, SE6. If you wish to see the deteriorated state of a three bedroom HMO, please come and visit [REDACTED] and compare it with the general upkeep of other houses in the same road.		
CS2309	Yes	Evelyn	Occupier	Very Positive	The sooner the better.	Support noted	No action taken
CS2310	Yes	Evelyn	Owner/Occupier	Very Positive	This is a good step to stop more family homes being lost to bedsits.	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	No action taken
CS2311	Yes	Forest Hill	Tenant	Negative	This policy will restrict the housing availability in the	Objection noted	No action taken

					<p>market for young people who often share with unrelated people in properties which are often completely suitable.</p> <p>3 unrelated people sharing a 3 bedroom house/apartment should be able to choose any property on the market.</p> <p>This policy will inevitably push sharers out of the borough making housing even more costly. It may also prove ineffective if renter's circumvent the rules.</p> <p>I don't feel this policy recognises the needs of young, single people on modest/average incomes who need</p>	<p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p>	
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					<p>to share to live in the borough.</p> <p>Licensing and minimum standards for Small HMOs should be all that is required, rather than letting local people oppose non-nuclear households living on their streets.</p>		
CS2312	Yes	Evelyn	Tenant	Positive	N/A	Support noted	No action taken
CS2313	Yes	Catford South	Occupier	Very Positive	<p>Total over concentration of them in our area. Every second house that is sold seems to be converted to one. As soon as completed there is anti social behaviour, domestic disputes, fighting, loud music. One was recently burned out near us after a fight between residents.</p>	<p>Support Noted</p> <p>Officers will not comment on individual cases. Some text has been redacted due to what is deemed personal/sensitive information.</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but</p>	No action taken

					Impossible to contact landlords, always saying it's someone else's responsibility	to better manage and monitor the impact of small HMOs throughout the Borough.	
CS2314	Yes	Rushey Green	Owner/Occupier	Very Positive	Article 4 should be in place everywhere. Why are cash hungry landlords able to destroy family homes to create low quality rooms and charge a premium for them.	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough The Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council.	No action taken
CS2315	Yes	Crofton Park	Tenant	Negative	Since the introduction of the small HMO rule I have struggled hugely to find	Objection noted. Officers will not comment on specific cases	No action taken

					<p>adequate housing in lewisham.</p> <p>It's been difficult to find any small HMO properties for me and my two flatmates. This was, in part, due to many landlords choosing not to accept 3 friends living in a property and reserving the housing for couples and families because they did not want to apply for a HMO license.</p> <p>I think it's unfair that the council is able to stop young people like me from getting adequate housing when this is already so difficult in London.</p> <p>Additionally, many three bed properties were advertised as being</p>	<p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough</p> <p>The Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council.</p>	
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					<p>for only two friends or couples. In the former case, we are simply reducing the number of rooms available for rent in lewisham. This restricts supply and further increases the price of rent.</p> <p>It would be interesting if the council looked into the impact on rent prices and the actual availability of small HMOs since lewisham council introduced the HMO policy.</p> <p>This new policy simply increases the amount of paperwork required and as such landlords choose to rent to richer, more affluent people who can afford the rent on just two salaries instead of three.</p>		
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CS2316	Yes	Hither Green	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	No action taken
CS2317	Yes	Catford South	Owner/Occupier	Very Positive	This area needs no more HMOs	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough	No action taken
CS2318	Yes	Lewisham Central	Tenant	Very Positive	Given the arrival of the new student specific facilities there is now enough provision for them. Throughout the borough there appears to not be sufficient available accommodation for family units especially for larger or growing families.	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	No action taken

						The London plan acknowledges that HMOs are an important source of low cost housing within the private rented sector for a number of groups including students	
CS2319	Yes	Lewisham Central	Landlord	Very Negative	Having high quality HMOs is key to gentrification. Young professionals from the City and Canary Wharf come to live in Lewisham. They bring energy and spending power to the area. We need more young professionals living in the Borough. They are healthy, use the NHS less and are net contributor to the borough.	Objection noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	No action taken
CS2320	Yes	Catford South	Owner/Occupier	Very Positive	Although I support providing housing for people in all situations, the	Support noted The purpose of the Article 4 Direction is	

					degradation of family homes through their conversion into unsafe, unregulated HMOs must be addressed.	not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough The Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council	
CS2321	Yes	Grove Park	Owner/Occupier	Very Positive	N/A	Support noted	No action taken
CS2322	Yes	Lee Green	Owner/Occupier	Very Positive	Any chance you can stop new small HMOs this year in 2023? Potentially you are fuelling a last minute surge in conversions by having the change go through in 2024. Plus we should have the right to object.	Support noted The decision to make a non-immediate Article 4 direction was to reduce the likelihood of compensation claims against the Council.	No action taken

CS2323	Yes	Rushey Green	Owner/Occupier	Very Positive	<p>I support it because I am experiencing the effects of illegal HMO conversion by Stef and Phips and subsequent negligence of landlord in [REDACTED]</p> <p>Really poorly worded question - do you support or object and not a yes or no answer!</p>	<p>Support noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough</p> <p>The Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council</p>	No action taken
CS2324	No	Hither Green	Landlord	Very Negative	<p>This will remove housing availability for young people and students who can't afford to rent exclusive property. This prices them out of the borough it also prevents their independence and leaving home.</p>	<p>Objection noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small</p>	No action taken

						HMOs throughout the Borough	
CS2325	Yes	Deptford	Owner/Occupier	Positive	Generally supportive with additional safeguards to protect small vulnerable families of fewer than 3 (e.g. single carer + 1)	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough	No action taken
CS2326	Yes	Rushey Green	Owner/Occupier	Very Positive	We live 2 doors away from a HMO on a close which is very badly maintained. With the rest of the close occupied by a large proportion of young families and elderly residents, the amount of rubbish and poorly maintained garden and property is evident and	Support noted Officers will not comment on specific cases The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small	No action taken

					negatively impacts on the close itself. For example, there was a recent fire in the property, and a broken window has been boarded and not fixed.	HMOs throughout the Borough	
CS2327	Yes	Brockley	Owner/Occupier	Positive	It is wrong that these conversions happen with no scrutiny possible by the Local authority. However, the sort of landlord who exploits the vulnerable is more likely to be able to find his way through the Planning Maze than people who are clubbing together to get through the Cost of Living Crisis and end up on the wrong side of the system, because they do not know to call themselves a single household and have a few	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough The Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council	No action taken

					locks for privacy. The application process for becoming an HMO needs to be responsive to the circumstances of the people involved.		
CS2328	Yes	Rushey Green	Owner/Occupier	Very Positive	<p>I made early presentations in response to the previous representation period in 2022, and would like my comments to be taken into account by the Council when considering whether to confirm the new direction, please confirm this in writing.</p> <p>*comments submitted in previous consultation are available to view in the schedule of comments</p>	Support noted	No action taken

CS23329	Yes	Brockley	Owner/Occupier	Very Negative	<p>Our borough has a high concentration of students whom need accommodation and hence this proposal will greatly decrease the amount of properties available for them as owners would likely be put off by having to go through the full planning process due to the time, cost & uncertainty of outcomes.</p> <p>As a result, rents will increase as more people fight for lesser availability and only add to the cost of living issue.</p>	<p>Objection noted</p> <p>There is no evidence to show that rents will increase due to the implementation of an Article 4 direction on small HMOs in the Borough.</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough</p>	No action taken
CS2330	Yes	Deptford	Owner/Occupier	Very Positive	we have non approved HMO's in our neighbourhood placing additional	Support noted	No action taken

					burden on the services & infrastructure to the cost of all residents and not to the landlords who just pass on any costs to the tenants forced to live in sub standard accommodation	Officers will not comment on specific cases The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough	
CS2331	Yes	Lee Green	Owner/Occupier	Very Positive	N/A	Support noted	No action taken

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between 30/09/2022 and 05/12/2022**

Submission ref	Are you a resident of the London Borough of Lewisham? - Resident?	If you answered yes, which ward do you live in?	Are you a Landlord/ Occupier/Tenant?	What do you think about the proposed Article 4 Direction on Small HMOs for the remainder of the borough?	Any comments you would like to add?	Officer comment	Action
CS01	Yes	Lee Green	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS02	Yes	Deptford	Owner/Occupier	Positive	N/A	Support noted No comment submitted by the respondent	None
CS03	Yes	Forest Hill	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS04	Yes	Telegraph Hill	Occupier	Very Positive	At present, you can convert a family house into an HMO without planning permission. The Council has policies on converting family houses into flats. So this same scrutiny should	Support noted If made the Article 4 direction on small HMOs will require any conversion of a family home into a small HMO to	None

					apply in relation to HMOs as well, which can drastically alter the 'feel' of a neighbourhood and the experience of neighbours living nearby, without any consideration currently. I support the move by Lewisham.	be granted planning permission.	
CS05	Yes	Lee Green	Owner/Occupier	Very Positive	I'd be happy if you brought it in sooner. We need to ensure rogue landlords don't have more time to buy up properties in the borough.	Support noted The decision to make a non-immediate Article 4 direction was to reduce the likelihood of compensation claims against the Council.	None
CS06	Yes	Ladywell	Owner/Occupier	Positive	N/A	Support noted No comment submitted by the respondent	None
CS07	Yes	Rushey Green	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS08	Yes	Evelyn	Owner/Occupier	Very Positive	This should have been introduced cross-borough when it was brought in for southern wards. The delay and now the necessity to wait another year mean	Support noted Since the Lewisham HMO Review and Evidence paper 2018 the evidence has become much stronger in support of	None

					countless homes are lost to greedy HMO landlords.	introducing an Article 4 direction across the whole borough as outlined in the Lewisham HMO Review and Evidence paper 2022.	
CS09	Yes	Bellingham	Owner/Occupier	Positive	I broadly support the aims of the direction. If anything, I would have liked it to have come in force earlier. My ward (Bellingham) consists mainly of family housing, a large part of which is also social housing. Across the Borough, there is a demand for this type of housing that outstrips supply. We already have a large number of small HMOs which I consider inappropriate for this type of housing.	Support noted On the 18 th September 2019 Mayor and Cabinet approved the confirmation of a non-immediate Article 4 Direction on Small HMOs in the South of the Borough including the Bellingham ward. This Article 4 Direction came into force on the 7 th March 2020.	None
CS10	Yes	Catford South	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS11	Yes	Hither Green	Owner/Occupier	Very Positive	A 3 bed house on my road [REDACTED] was purchased in 2021 and quickly turned into a HMO of 6 units by [REDACTED]. The building process required no permission and	Support Noted. Officers will not comment on individual cases. Some text has been redacted due to what is deemed	None

					has caused structural issues to the adjacent homes at huge emotional and financial stress to the owners. I was aghast this could happen without permission or consultation. Tenants, clearly with vulnerabilities, were moved into the house around 4 months ago and recently caused a fire in the house which has caused huge concern to all local residents. No developer should be able to act in this way and leave home owners and local residents helpless against this type of activity.	personal/sensitive information.	
CS12	Yes	Evelyn	Owner/Occupier	Very Positive	Our Deptford Park petition of 2021 strongly supported better control of HMOs in the area, in the face of developers buying up 3 bed Victorian family houses and converting them. There is significant demand for short term accommodation for transient individuals willing to pay £800-1000 a month so this is not necessarily	Support noted If implemented the Article 4 Direction will assist the new Additional HMO licensing Scheme, covering most HMOs that has been recently introduced by the Council.	None

					providing accommodation for those with limited income. Where there is no control with respect to concentrations of HMOs in a given road or area and where is no effective process to inspect and licence unlicensed properties then the only alternative is to control the expansion at planning level.		
CS13	Yes	Deptford	Owner/Occupier	Very Positive	<p>I and my husband live on [REDACTED]. It has historically been a wonderful neighbourhood with families and a community. More latterly houses that are purchased and turned into HMOs can result in noise, poor house maintenance and high turnover of people who have no interest in the community or the area. This is not always the case however, and we understand some rentals and affordable residential is needed. It's a balance though, and certainly there</p>	<p>Support Noted</p> <p>Some text has been redacted due to what is deemed personal/sensitive information.</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p>	None

				<p>are already enough in the road.</p> <p>The general outcome of HMOs include: Rubbish & bins left blocking the pavement Flytipping Noise Parking problems Properties in poor repair Anti-social behaviour</p> <p>Myself and my neighbours who are involved in the local community love living in this area, and we look after our houses and contribute to the overall improvement of the area. We are all concerned with a potential downward trend of care for the area. We want to limit this by restricting the possibility/numbers of people who buy houses, rent them out as 6 individuals, don't maintain the houses, or live in the area and therefore have no interest in the impact on the local community.</p>		
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					The houses are over 100 years old, and are wonderful if looked after. They do need a lot of care and it's sad to see some that are crumbling. Generally owner-occupiers do the necessary care of these buildings so they will last for another 100 years.		
CS14	Yes	Evelyn	Owner/Occupier	Very Positive	The proliferation of HMOs in the area does nothing to improve the life of residents. The amount of waste generated from these properties puts a strain on the utilities. Some of the houses have more than two bins. The residents generally do not fit in with local residents who take a pride in their properties.	Support Noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	None
CS15	Yes	Deptford	Owner/Occupier	Very Positive	Local roads now have more HMOs than residents. It's been a free for all causing parking issues & overflowing bins as no individual renters are taking responsibility for bins	Support Noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of	None

						small HMOs throughout the Borough.	
CS16	Yes	Evelyn	Owner/Occupier	Very Positive	<p>As stated the statistics documented are unlikely to reflect the true numbers of HMOs in the borough eg evidence from residents, numbers of bins, over occupancy suggests the true number is probably at least 25% higher.</p> <p>Licensing was suspended during lockdown and there is clearly a backlog, this in addition to those properties that appear not to have been licensed in the first place.</p> <p>While there is a acknowledged need for some low cost accommodation a significant amount of HMOs in the borough seems to be just serving the needs of a transient population, some of which have homes elsewhere. The demographics of many areas have been slewed away from families and</p>	<p>Support noted</p> <p>Section 7 of the Lewisham HMO Review and Evidence paper, May 2022 highlights the data sets available to officers in informing the recommendation to implement the Article 4 direction.</p>	None

					<p>balanced communities to what could now be described as dormitory areas. The demographics of Lewisham and London generally have changed dramatically evidenced by falling primary school rolls in many areas. HMOs have contributed to this.</p> <p>The ASB issues related to HMOs are well documented and there is a financial cost of this to the council, as well as a social cost to communities.</p> <p>In the evidence paper HMOs per ward are documented in absolute numbers, this can be misleading as true concentration depends on the % of HMOs in relation to the number of family homes available for such a conversion. eg para 7.22 table 5 has no such % calculations and therefore does not give a true picture.</p>		
CS17	Yes	Deptford	Owner/Occupier	Very Positive	N/A	Support noted	None

						No comment submitted by the respondent	
CS18	Yes	Deptford	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS19	Yes	Evelyn	Owner/Occupier	Very Positive	<p>I own my house, family house on a victorian terrace street. My house is in the middle of two HMO properties either side of me. There is a huge amount of overflowing rubbish from their bins, the street is overflowing with smelly rubbish since the black bins are only collected every 2 weeks.</p> <p>Noise of parties is ok once in a while, I'm not a prude but when I'm trying to put my primary school children to bed their house continues noise late into early hours during the weekdays.</p> <p>There is overcrowding in these hmos and these people smoke marijuana in their tented rooms, which</p>	Support noted Officers will not comment of specific cases during this consultation. The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.	None

					<p>means the smell goes into my house if I open my house windows. My childrens bedroom smells which is not any patent wants.</p> <p>I bought my house here 10 years ago for a quieter family residential property, but since then most of the street is now hmo.</p>		
CS20	Yes	Evelyn	Occupier	Very Positive	<p>The houses here are great family Victorian homes adjacent to the wonderful deptford park which is a great space for all and all with a deep history attached. Family's and the elderly residents are often being hoodwinked into selling to new family's only to find out the purchasers are developers who then rip out and destroy the traditional character and features of the buildings . These HMO's become short term high turn around lettings which destroy the neighbourly values and also leads to constant fly tipping,</p>	<p>Support noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p>	None

					The sheer scale and number of new developments in the immediate surrounding area should warrant a great reduction in the need for HMO's and the ability to secure a traditional family home		
CS21	Yes	Forest Hill	Tenant	Very Negative	<p>I feel that this policy will in the medium/long-term reduce the availability of housing options for young people and disproportionately impact people that do not have the means to rent individually or rent with one other person.</p> <p>It will inevitably and disproportionately lead to rise in rents for students in the borough and younger people. With rents as high as they are, this will make the borough unaffordable for these people to live in.</p> <p>There isn't enough housing as it is and it is unclear to me what this policy achieves - it certainly</p>	<p>Objection noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p>	None

					doesn't improve the availability of housing or the cost of it which should be a priority for the council over homeowner concerns over parking.		
CS22	Yes	Evelyn	Occupier	Very Positive	We have a HMO next to us. We have had problems with noise late at night. It takes away a feeling of having neighbours you can develop a relationship with.	Support Noted	None
CS23	Yes	Evelyn	Tenant	Very Positive	family housing in social housing blocks should be taken back if a leaseholder has turned into a HMO	Support Noted	None
CS24	Yes	Evelyn	Owner/Occupier	Very Positive	This is important for retaining a balance of homes in the area - flats, high quality HMOs/house shares, family houses etc.	Support Noted	None
CS25	Yes	Ladywell	Landlord	Negative	There will be no real way of telling. People won't apply for status. Friends will have to pretend to be a family to get a better houses etc. Need to make clear if applies to lodgers. You will lose lots of high quality	Objection noted The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of	None

					accommodation if you put people off having lodgers.	small HMOs throughout the Borough. The introduction of the HMO Article 4 direction will be assisted by the introduction of a additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough.	
CS26	Yes	Evelyn	Owner/Occupier	Very Positive	<p>The development of multiple HMOs in our area (Deptford Park) is adversely affecting the area:</p> <p>Some of the current issues include increases in littering, general untidiness, fly tipping and noise.</p> <p>It also raises longer term concerns about homogenisation, unbalancing and weakening of a sense the community, with a loss of families and children. This trend has already been exacerbated by the planning of, building and future occupation of multiple small flats and</p>	<p>Support noted</p> <p>The focus of the consultation is to determine the support for the implementation of an Article 4 direction on Small HMOs across the Borough.</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>Officers will not comment on other development</p>	None

					student accommodation in North Deptford. Current amenities are already under strain as the local population balloons without any significant increase in local amenities or publicly owned open space.	that is being undertaken throughout the Borough.	
CS27	Yes	Evelyn	Owner/Occupier	Very Positive	Loss of family homes to landlords is a blight on the area.	Support Noted	None
CS28	Yes	Evelyn	Owner/Occupier	Neutral	<p>This should have been done a long time ago in the meantime many homes have been poorly converted and too many people occupying the space.</p> <p>Even with planning needed I would hope there must be a special reason it's granted.</p> <p>There are way too many legal and illegal HMO's in the area. Destroying the character of the family homes.</p> <p>With the new EPC rules coming in I doubt any of these Victorian homes</p>	<p>Support noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough.</p>	None

					<p>would classify as band C even after the necessary updating.</p> <p>With all the new development in Evelyn where us the infrastructure to hold so many people.</p>		
CS29	Yes	Catford South	Landlord	Very Positive	<p>This feels like a very necessary step towards ensuring controlled development of HMOs across the borough. Many residential streets near where I live on the Corbett estate have seen single family houses converted into HMOs with very small spaces and few facilities for residents. Most have no allowance for outside space and interior spaces hardly have room to accommodate more than a single bed. Furthermore companies such as Stef & Philips Ltd have been negligent in their handling of proper construction and civil law processes, ignoring the need for party wall agreements and any</p>	<p>Support noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>If there is a continued example of inappropriate development or issues</p>	None

					<p>correspondence with neighbours during the conversion process. Their contractors have been hostile to adjacent neighbours and caused damage to neighbouring properties due to a lack of care and quality management on site. When occupied, HMOs managed by these companies often have inadequate refuse collection facilities leading to fly tipping and unsightly streets due to residents littering and bins overflowing. We are seeing drainage problems due to Victorian sewage infrastructure being unable to handle the uplift in capacity when a 2 bedroom house is converted into a 5 person HMO. These rooms are meant to be single occupancy, but in the absence of proper monitoring of properties from the likes of Stef & Philips, there are often multiple people staying and visiting in each room,</p>	<p>around anti-social behaviour please inform the Councils Planning Enforcement team, the Councils Private Sector Housing Enforcement team or for anti-social behaviour contact the Met police via their non-emergency helpline.</p>	
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					<p>adding to the load on services within and outside the property. Tenants themselves are often vulnerable or not well vetted by these companies and we have faced confrontations with neighbouring tenants at Stef & Philips property who have been using illegal drugs in the front of the property, seen a tenant get arrested with a big police presence on the street which caused alarm, had noise issues and witnessed abusive behaviour from tenants to neighbours. These properties need to be located close to services, whether these are health or social care related and residential areas such as the Corbett estate which offer very little other than schools and housing are not appropriate for such residents in comparison to urban areas close to town/neighbourhood centres. Proper planning permission requirement will</p>		
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					give the council the leverage to better determine what areas are and aren't appropriate for this type of housing. As well as to hold developers to higher standards in designing and building these HMOs. It also allows due process for neighbours to firstly be aware of such developments being planned and then to object to a proposal if they feel it will negatively impact on a street. This can then be considered in the decision making process, rather than the ad hoc free for all we are currently experiencing.		
CS30	Yes	Deptford	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS31	Yes	Evelyn	Owner/Occupier	Very Positive	In the Evelyn Ward the use of HMOs is out of control and, in recent years, there have been numerous family homes that have been gutted and repurposed to house 7 rooms or more. Each room being a tiny bed	Support noted	None

					<p>sit with en-suite and no shared space for people to live. Not only this provides subpar accommodation (small and cramped) for the occupiers at a massive profit for the landlords, but it also destroys (often permanently) family homes. There is a real lack of 3+bedrooms properties in Evelyn. This forces people to live out of the area and children are forced to change schools. Schools are under subscribed here as a result. There is a real lack of 'community' in recent years due to the transitional nature of HMOS and the huge rents people are forced to pay. There's are issues with rubbish removal, parking spaces, lack of bike hangers as these houses/flats are now occupied by double (if not triple) the amount of people they were designed to do. Whilst having some HMOs is important to provide a mixture of options for those renting, in</p>		
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					this area the situation is unsustainable. Prices have been pushed up to such a point that neither people buying or renting can sustain it.		
CS32	Yes	Rushey Green	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS33	Yes	Lee Green	Owner/Occupier	Very Positive	N/A	Support noted No comment submitted by the respondent	None
CS34	Yes	Lewisham Central	Occupier	Very Positive	Enforcement is key, whilst my road, a conservation area with Article 4 designation going back to 1976, enforcement is non-existent. Education and enforcement is key. There only remain a handful of owner occupied premises in Lewisham Town Centre and the council needs to enforce what regulations already exist.	Support noted	None
CS35	Yes	New Cross Gate	Owner/Occupier	Very Positive	we have seen a good deal of properties not fit for purpose rented out on new X rd. Being a landlord is	Support noted The purpose of the Article 4 Direction is to better	None

					<p>equivalent to a pyramid scheme-resting on the hardship or need of others. Everyone deserves affordable, fit housing. A neighbour lives in a shed in the garden- that no legal body monitors. Planning permission would put some people off from doing the illicit-our neighbour did not apply.</p>	<p>manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>The officer would also like to note that the generalisation made on landlords within this comment is incorrect and the Council supports Landlords who provide a high standard of housing product.</p>	
CS36	Yes	Catford South	Tenant	Very Negative	N/A	<p>Objection noted</p> <p>No comment submitted by the respondent</p>	None
CS37	Yes	Perry Vale	Owner/Occupier	Very Positive	I think this kind of control is essential to protect the welfare of Lewisham residents, and to ensure proper amenities/services	Support noted	None

					are in place to service any HMO.		
CS38	Yes	Brockley	Owner/Occupier	Very Negative	<p>Removing these PD rights will exasperate the already shortage of rental properties especially for areas where there are large student populations.</p> <p>This will not help owners in particularly small landlords or owners whom may become “accidental landlords” as they will now have more expense submitting planning applications and as a result rentals becoming more and more unaffordable.</p> <p>In addition, would this not put more unnecessary pressure on the Local Council planning department whom are already likely to be overstretched.</p>	<p>Objection noted</p> <p>The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p>	None
CS39	Yes	Grove Park	Owner/Occupier	Very Positive	Important to have these measures in place.	Support noted	None
CS40	Yes	Lee Green	Owner/Occupier	Very Positive	N/A	Support noted	None

						No comment submitted by the respondent	
CS41	Yes	Rushey Green	Owner/Occupier	Very Positive	Rushey Green has a high concentration of HMOs and this article 4 will help reduce the amount of poor quality HMOs coming to Catford.	Support noted	None
CS42	Yes	Catford South	Owner/Occupier	Very Negative	<p>All HMO applications should be rejected for the following reasons :-</p> <ol style="list-style-type: none"> 1. Multiple occupancy engenders conflict between tenants as individuals have personal and conflicting intentions and responsibility. 2. The landlord is only really interested in the income it generates for himself. 3. The landlord is unlikely to be living in the same HMO premises so that he will not be bothered about the environmental state or noise pollution caused by the residents. Such activity will only drive down the 	<p>Objection noted</p> <p>The purpose of the Article 4 Direction is better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough.</p> <p>The Council recognises the value that HMOs have in serving distinct needs on a national, regional and local level. The intention</p>	None

				<p>general condition of the area, which will have a further downward affect on the upkeep of the area by future residents.</p> <p>4. Such tenants are only likely to be living in the area for a short period of time as they will move on to other area for better housing or work reasons and thus will not be bothered on the presentation of the property. Furthermore, on moving out are likely to further deteriorate the area by finding were to deposit unwanted furniture and bedding on street corners.</p> <p>Currently there are two beds discarded at the top of Daneby Road, SE6. If you wish to see the deteriorated state of a three bedroom HMO, please come and visit No 106 Daneby Road, Catford SE6 and compare it with the general upkeep of other houses in the same road.</p>	<p>of the Article 4 direction is not to exclude HMOs from the housing market.</p>	
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CS43	Yes	Catford South	Occupier	Very Positive	I live in a ward that has recently been very adversely affected by the rise in HMO development. This is causing an imbalance in the type of housing in the area. It is very important that residents have a say in the type of development that happens in their area. Yes there is a place for HMOs but not this rate to convert as many houses as a developer can purchase (and they have the spending power) An Article 4 will force all developers to go through planning allowing residents to have their say.	Support noted	None
CS44	Yes	Lee Green	Owner/Occupier	Very Negative	N/A	Objection noted No comment submitted by the respondent	None
CS45	Yes	Lee Green	Tenant	Negative	It is a lot of information and I have concerns, if it in fact means that landlords cannot create badly converted small spaces for shared occupation then this is a good idea. Is this an issue in the area or is this another source of	Objection supported The purpose of the Article 4 Direction is not to exclude HMOs from the housing market but to better manage and monitor the impact of	None

				<p>controlling what people do. Bearing in mind people due to housing crisis, and it is a crisis when people do not move around as much the prices are sky high and they cannot find larger accommodation for their families so they stay and improve where they are, that stops the once natural movement of people. The people who can afford move into the area and then complain about its character i.e. the messy market then move out as they can afford to, the ones who live and were born and bred and cannot afford to move out for various financial reasons are left with the changes that are made, it seems to appease the more affluent. I have seen this in various areas over the years, Surrey Docks still has the same vibe with an addition of the affluent, both moving along side by side as it should be - but frequenting different</p>	<p>small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>The evidence that supports the making of this Article 4 direction is presented in the Lewisham HMO review and evidence paper (2022). Lewisham is committed to providing a range of different housing products that will benefit both current and future residents.</p>	
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					drinking holes/restaurants being the only difference.		
CS46	Yes	Sydenham	Owner/Occupier	Positive	N/A	Support noted No comment submitted by the respondent	None
CS47	Yes	Forest Hill	Owner/Occupier	Very Negative	High Density living increased even more; increased vehicles per household; increased health risk with increase refuse; impact on neighbouring properties due to increase residency under one roof.	The respondent has noted that they are very negative regarding the making of the article 4 direction, however their comment would suggest that they are in fact supportive of this initiative. The intention of the Article 4 direction is to better manage and monitor the impact of small HMOs and is not intended to trigger an increase of small HMO properties across the borough that are miss managed	None
CS48	Yes	Perry Vale	Landlord	Very Positive	I think it's a good idea not to have too many HMOs, also that they shouldn't be concentrated in one area.	Support noted The purpose of the Article 4 Direction is not to exclude HMOs from the	None

					And also that they should be of good quality.	housing market but to better manage and monitor the impact of small HMOs throughout the Borough. The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough	
CS49	Yes	Perry Vale	Owner/Occupier	Positive	N/A	Support noted No comment submitted by the respondent	None
CS50	Yes	Forest Hill	Owner/Occupier	Very Positive	N/A	Support noted	None
CS51	Yes	Sydenham	Owner/Occupier	Very Positive	I think that the housing stock should be made available to buy, rather than be used to house multiple people in tiny cramped often poorly renovated 3 bedroom houses, converted to accommodate 6 people. The rents on these places can be up to £1000/room	The purpose of the Article 4 Direction is to better manage and monitor the impact of small HMOs throughout the Borough. The introduction of the HMO Article 4 direction will be assisted by the introduction of an	None

					<p>which means a lot of profit for companies with poor quality of life for resident and communities</p>	<p>additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>The Council recognises the value that HMOs have in serving distinct needs on a national, regional and local level. The intention of the Article 4 direction is not to exclude HMOs from the housing market</p>	
CS52	Yes	Catford South	Owner/Occupier	Very Positive	<p>Far too many HMO's in the area, this law is needed to stop our borough becoming a money tree for greedy landlords.</p>	<p>The purpose of the Article 4 Direction is not to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p>	None

CS53	Yes	Telegraph Hill	N/A	Very Positive	<p>Note that this consultation is being completed on behalf of the Telegraph Hill Society, a residents' association covering the Telegraph Hill Conservation Area.</p> <p>We have been concerned for a number of years over the loss of large family houses in the north of borough. Should the proposals in the draft Local Plan go through, which advocates subdivision of smaller properties than was previously allowed, we believe this will get worse.</p> <p>We have no objection to HMOs - indeed we find them preferable from a conservation viewpoint to conversion of properties into flats - as HMOs can be much more readily re-converted into single dwellings than flats can be and therefore they do not reduce the potential stock of larger family houses in the way flat conversion</p>	<p>Support noted</p> <p>Draft Local Plan Policy H02.E has been amended to make clear that the gross conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where the gross internal floor space of the existing original dwelling is 130 sq. metres or greater. Specifying 'the original' dwelling mitigates the issue raised regarding the conversion of HMOs into flats</p>	None
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					<p>does.</p> <p>However the Council interprets its policies (in a way which we believe is wrong) to allow conversion of HMOs into flats arguing that an HMO is not family accommodation. The lack of control over smaller HMOs therefore means, as we have seen, a "loophole" whereby a developer can convert a family house into an HMO without planning permission and then get the Council to agree to the conversion to flats as no family home is lost. This is clearly wrong.</p> <p>Since the Council does not seem willing to change its views on HMO to flat conversion, we strongly support bringing smaller homes into the planning framework by way of an Article 4 direction. It will not close the loophole, but will, at least, allow the level of the problem to be monitored and give an</p>		
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					<p>opportunity for the case to be argued that the property should remain a family home or revert to a family home if it ceases to be an HMO.</p> <p>(We have not answered the remaining questions as they are either not applicable to the Society or cannot be answered in the format they are presented.)</p>		
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Comment Ref	Submitted Comment	Officer comment	Action
Resident	<p>Most London boroughs are now confirming Article 4 Direction for change to HMO's which means they have removed permitted development for changes to HMO.</p> <p>I'm sure your aware of the reasoning behind this which I have outlined below:</p> <ul style="list-style-type: none"> • Poor standards of accommodation • Loss of local character • Reduction in environmental quality • Increased noise complaints • Loss of single family dwelling • Increase pressure on car parking • Increased levels of crime <p>The local area is experiencing unprecedented development with 13500 flat being built so retaining family houses with a garden should be a priority.</p> <p>We don't need any further HMO, just better management of the exist HMO's.</p>	<p>Noted</p> <p>The purpose of the Article 4 Direction is to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>The Council recognises the value that HMOs have in serving distinct needs on a national, regional and local level. The intention of the Article 4 direction is not to exclude HMOs from the housing market</p>	None
TFL	Thank you for consulting Transport for London (TfL). I can confirm that we do not wish to make any representations	Noted	None

National Highways	<p>Dear Lewisham Strategic Policy Team,</p> <p>Thank you for your e-mail of 2nd October 2022 inviting National Highways to comment on the above consultation.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We have reviewed the Article 4 Direction on small HMOs and are satisfied that the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109).</p> <p>Thank you again for consulting with us and please continue to advise us of other relevant consultations via our inbox planningse@nationalhighways.co.uk.</p>		
Culverly Green Residents	<p>This is something that the Culverly Green Residents Association very much welcome as we know that not only in our immediate area this has been a cause of concern but in our adjoining roads such as Thornsbeach, Callendar and Daneby. It is our view that each such applications must be scrutinised as to the cumulative effect it is having on</p>	Support noted	None

	<p>surrounding properties. This can only be done through developers having to apply for Planning permission. We are very aware of the effect the present proliferation of HMO's has had on the Corbett estate and very much welcome this move by the council and look forward to it being implemented at the end of next September as do many residents of the borough.</p>		
Resident	<p>I am writing to express my opposition to London Borough of Lewisham's proposal to withdraw permitted development rights from HMOs across the borough.</p> <p>I have grown up in Lewisham and I love living here. However, I can only afford to stay in my home town because of the supply of HMOs. I would be completely unable to afford a one-bedroom flat for myself.</p> <p>For single persons and couples, renting in Lewisham is getting harder and harder. Supply is not keeping up with demand. The rental market is shrinking, as landlords are selling up their homes. This is pushing up rents, deposits and creating bidding wars among would-be tenants.</p> <p>I fear that this proposal would provide additional steep hurdles for landlords who are willing to provide accommodation for people on low to medium incomes like me. Landlords would need to go through a lengthy planning process in a stretched planning department and perhaps, contend with fierce local opposition and planning committee decisions.</p> <p>I fear that councillors are pushing this Article 4 directions because of feedback from residents which amounts to class-</p>	<p>Objection noted</p> <p>The purpose of the Article 4 Direction is to better manage and monitor the impact of small HMOs throughout the Borough.</p> <p>The introduction of the HMO Article 4 direction will be assisted by the introduction of an additional HMO Licensing Scheme. Together these initiatives will improve the quality of HMOs in the Borough</p> <p>The Council recognises the value that HMOs have in serving distinct needs on a national, regional and local level. The intention of the Article 4 direction is not to exclude HMOs from the housing market</p> <p>The evidence supporting the proposal of the Article 4 direction is robust and can be reviewed in the Lewisham HMO Review and Evidence paper (2022)</p>	None

	<p>based prejudices regarding HMOs for providing accommodation to low-income individuals. HMOs bring the wrong sort of neighbour to an area, thus harming its 'character'...</p> <p>I think a balance does needs to be struck, and I support Lewisham Council's landlord licensing scheme to maintain standards in the private rented sector.</p> <p>If Lewisham Council wants to help families get onto the local housing ladder, they need to building a lot more one bedroom flats to bring down the prices - so me and my flatmates can rent our own places and the 'family home' we occupy can be rented or sold to a family. We need to end the seller's market that forces tenants to accept bad landlords.</p> <p>I hope my feedback will be taken on board and offers some food for thought for your planning policy colleagues.</p>		
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