



Lewisham HMO Review and Evidence Paper

Update November 2018.

Table of Contents

1. Introduction.....	P.3
HMO review 2016.....	P.3
HMO review 2018.....	P.4
2. HMO definitions	P.4
3. Policy and legislative context.....	P.5
National.....	P.5
Regional.....	P.8
Local.....	P.9
4. Council mechanisms to deal and control HMOs	P.10
Article 4 direction	P.10
Planning enforcement.....	P.11
Licensing.....	P.12
5. Evidence - quantity and spatial distribution of HMOs	P.14
2001 and 2011 census data	P.14
Licensed HMOs.....	P.16
Council tax records	P.19
Planning and completions data.....	P.21
Planning enforcement cases.....	P.21
Benefits records.....	P.24
6. Street survey	P.26
Quantitative.....	P.27
Qualitative	P.28
7. Summary on the quantity and spatial distribution of HMOs	P.29
8. Impact on southern wards and Grove Park arising from a growth in small HMOs.....	P.31
9. Conclusions.....	P.37
10. Recommendations.....	P.37
11. Appendices.....	P.38
Appendix 1.....	P.38
Appendix 2.....	P.38
Appendix 3.....	P.42
Appendix 4.....	P.53
Appendix 5	P.56

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 license 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.

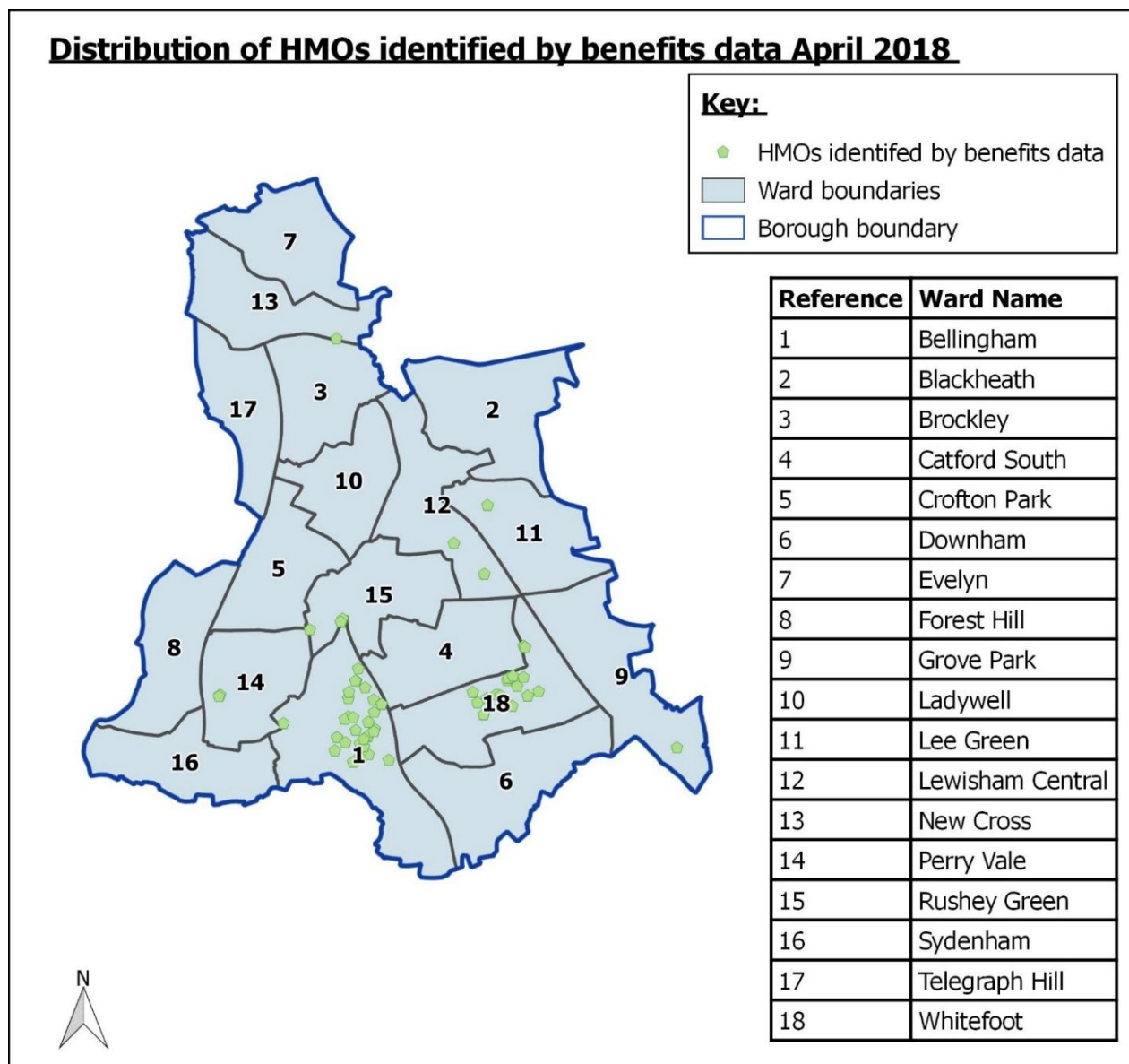


Figure 1

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.

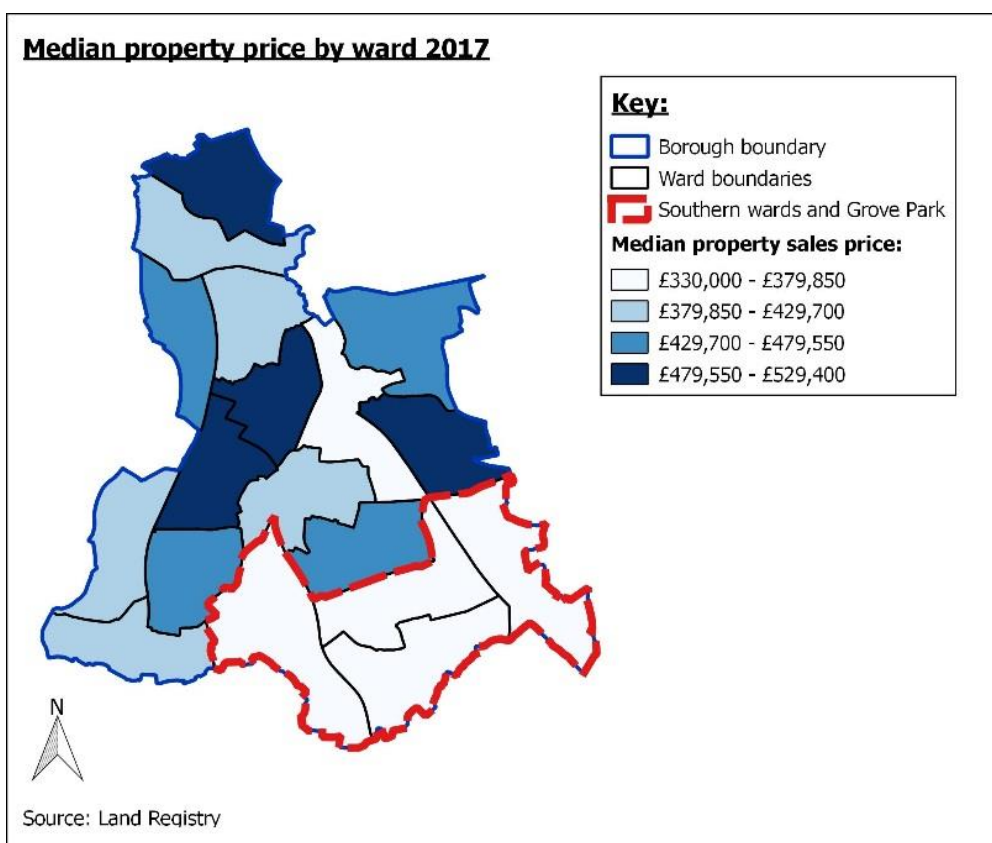


Figure 2

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.

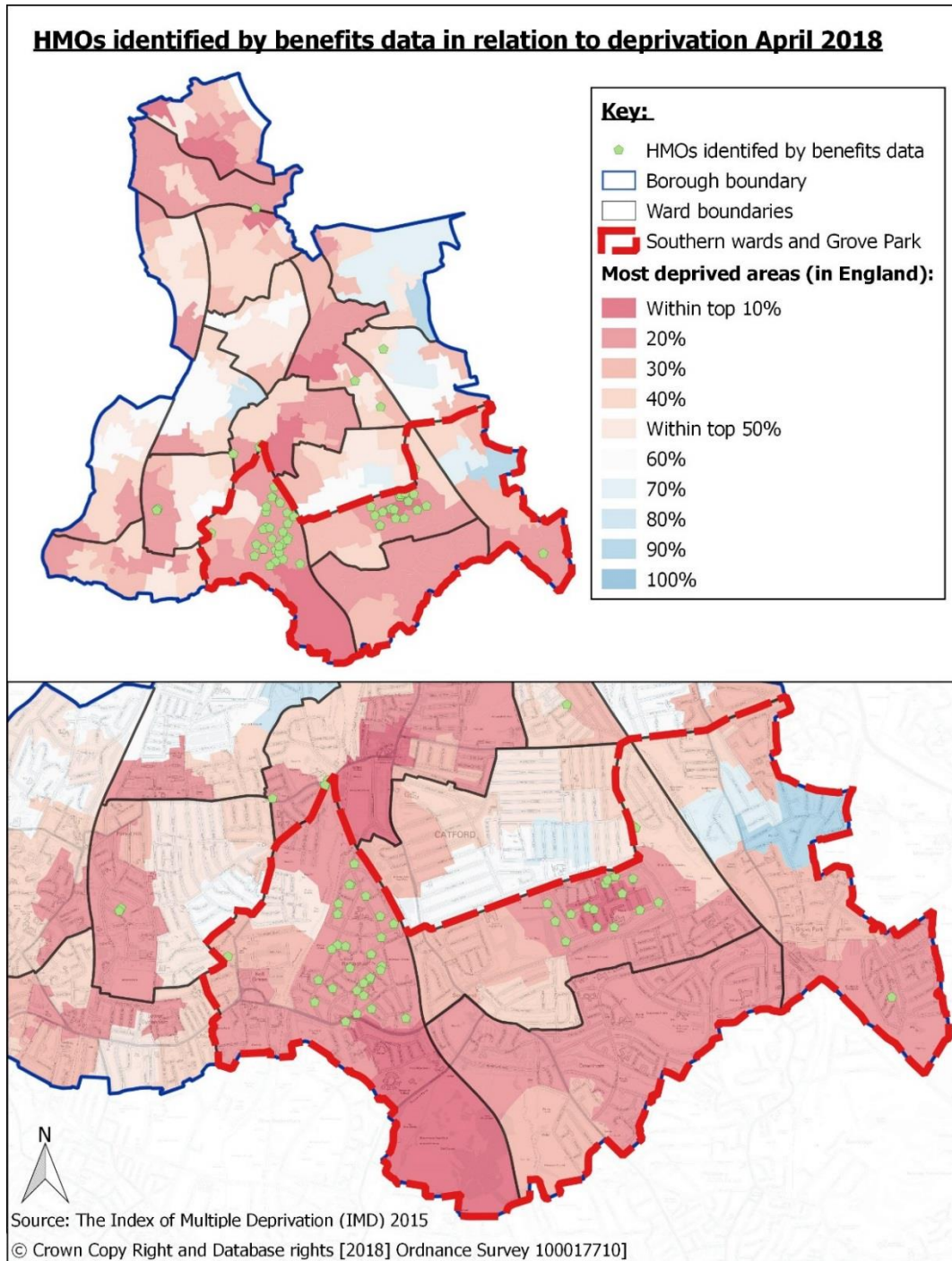


Figure 3

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.

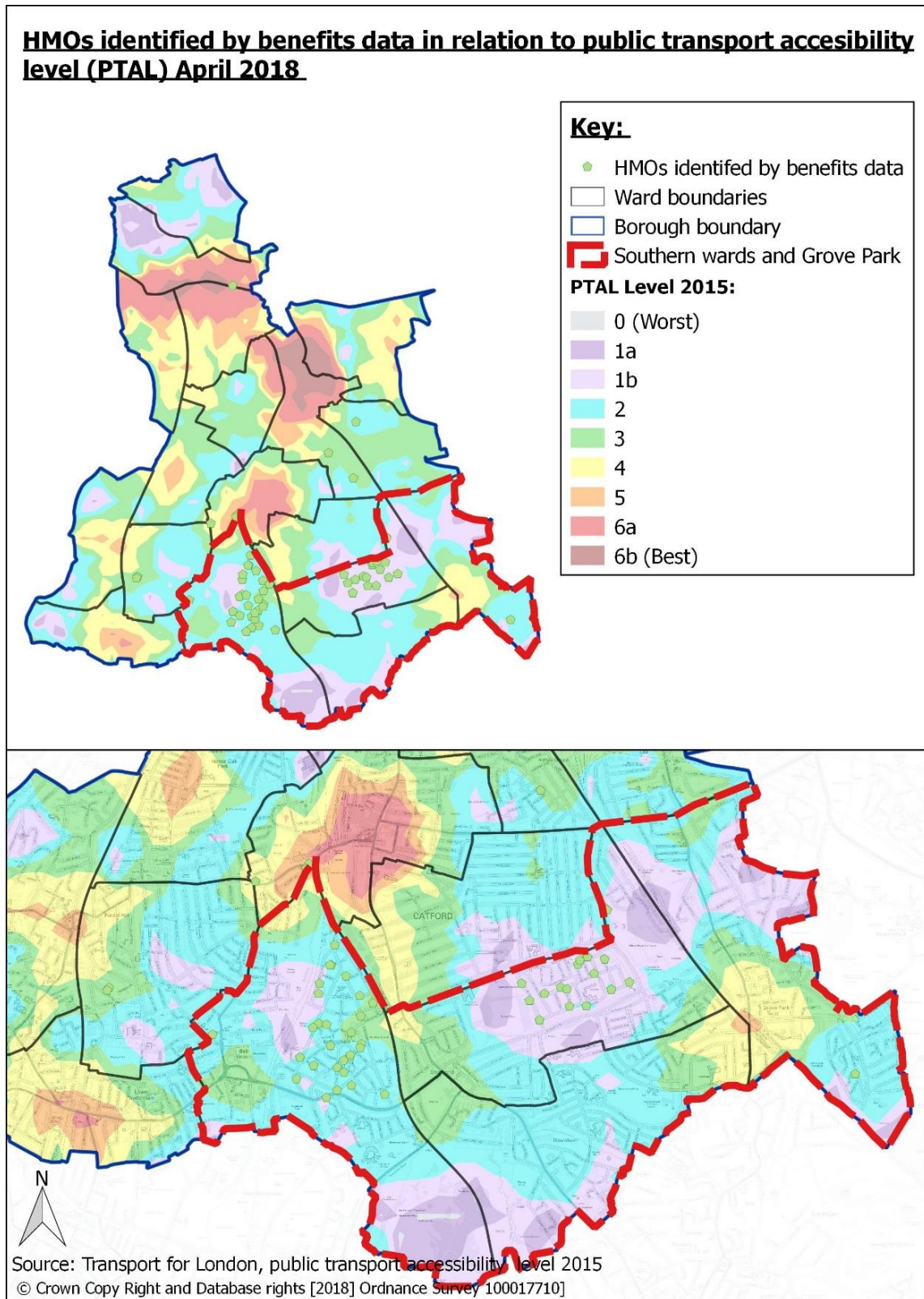


Figure 4

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.

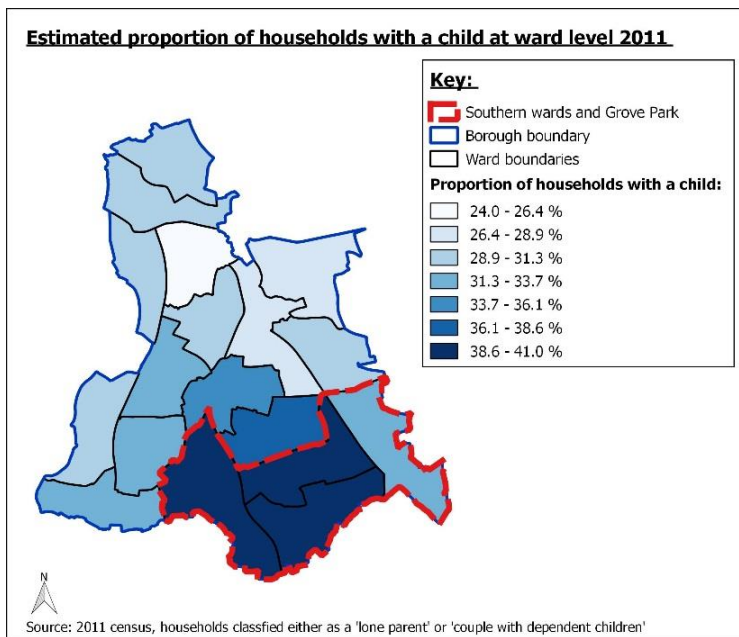


Figure 6

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.

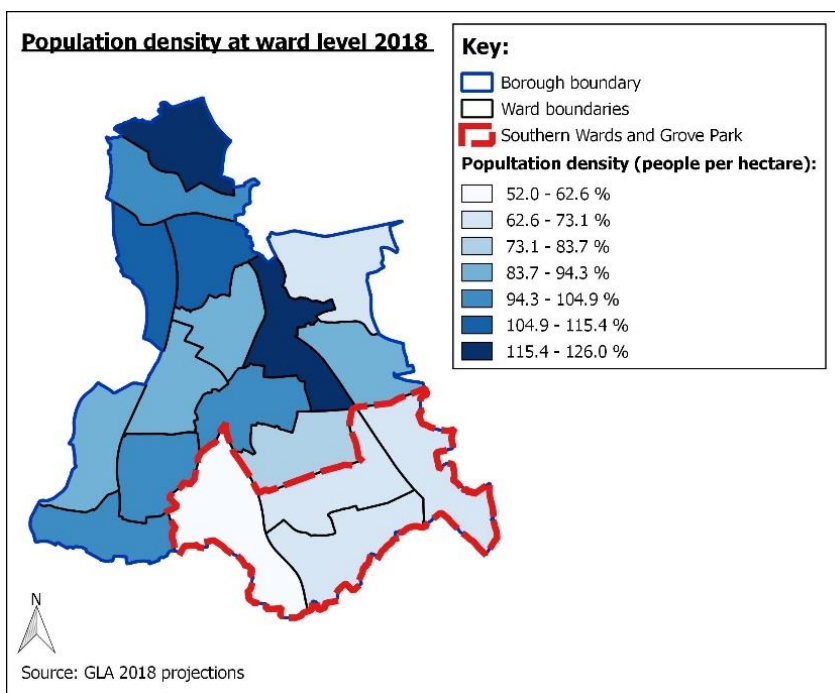


Figure 7

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
Dowderry 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
Darhmouth 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

