

## Appendix 5: Schedule of representations made and responses

| Point | Which ward do you live in? | Do you have any comments regarding the proposed Article 4 Direction on small HMOs in Lewisham's southern wards? - Comments   | Comment Category | Responses  |
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|       | <b>Residents</b>           |  |                  |  |
| 1     | Bellingham                 | I fully support of the change as this area has been heavily affected by HMOs and the council should manage and regulate it as it led to an immense problems with increase in crime | Support          | Noted.   |
| 2     | Lewisham Central           | There are too many poor quality houses of multiple occupation across Lewisham.   | General Comment  | The extension of the mandatory licensing scheme will help to overcome the issue with poor quality HMOs and subsequently drive up standards.  |
| 3     | Whitefoot                  | Why is it just the Southern wards? It seems a sensible idea for the whole borough.   | General Comment  | Paragraph 9.1 of the 2018 HMO Research and Evidence paper addressed this concern:<br><br><i>"On the strength of the data that has been discussed...., 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</i> |

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|   |           |   |                 | <i>is having an adverse impact on the borough's character or on the living conditions of nearby residents cannot be observed."</i>   |
| 4 | Whitefoot | It is very important that this is passed. There are too many Hmos. That is not adequate waste disposal for 6 separate households living in a very small converted property .  | Support         | Noted.   |
| 5 | Whitefoot | I am in complete agreement with it, it's a shame that it takes nearly a year to come into force. Many people around here invest in their properties and make family homes and along comes houses being converted as halfway houses, bedsits that are poorly maintained, creating social issues and devaluing property in the area, which is unfair to the people in the community that have personal investments in family homes. | Support         | Noted.   |
| 6 | Catford   | Excellent news, however the catchment area should also be extended to the historic Corbett Estate (Catford) as the justification also applies here, i.e. low public transport and accessibility, suburban character and loss of family housing, and high levels of deprivation.   | General Comment | The evidence available which is widely used and robust does not support the argument that Corbett Estate has similarly high levels of deprivation. Using the 2015 Multiple Deprivation Index, only 13% of Corbett Estates area falls within the third most deprived areas in England. Whereas in |

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|          |           |   |                 | <p>Bellingham this is 93%, 70% in Whitefoot, 100% in Downham and 67% in Grove Park. Furthermore, the Characterisation Study and other population density statistics do not support the assertion that Catford South, including Corbett Estate, has a similar strong suburban character and typology - please see section 7 and 8 of HMO evidence paper.</p> <p>The rationale for excluding Catford South in part also owed to its higher median property value (see figure 2 Evidence and Review Paper). Paragraph 7.7 of HMO review paper explained growth of small HMOs in a concentrated manner could be attributed the boroughs southern wards lower property values.</p> |
| <b>7</b> | Whitefoot | HMOs should have to be licenced nationwide. They are often notorious for overcrowding and poor living | General Comment | The extension to the mandatory licensing scheme will help improve   |

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|    |            | conditions, and put lots of strain on public services.   |                 | the quality of more HMOs.   |
| 8  | Whitefoot  | I think article 4 is need in the Whitefoot ward . I have been living on my street for twenty one years. It was a quiet clean street mainly consist of small family houses. In recent years however. Several of these houses have been converted into HMOs . This has change the whole area completely. Anti social behaviour has increased significantly. Tenants often leave their personal belongings on the streets or in their front gardens especial when they vacating the property. Crime has also increased. | Support         | Noted.  |
| 9  | Bellingham | The proposals do not go far enough. HMOs are not an acceptable form of housing for human beings and the negative impacts on the neighbouring properties of these types of property conversions can never be justified.<br><br>The proposed Article 4 Direction is a start but, in addition to preventing future such developments, something needs to be done to decrease the number of existing HMOs.   | General Comment | The purpose of the Article 4 Direction is to better manage and monitor the impact of Small HMO's through the planning process. The intention is not to exclude HMOs from the housing market; national, regional and local government all recognise the value HMOs have in serving distinct needs. |
| 10 | Whitefoot  | Fully support the direction. There are far too many HMOs in our area, and one main reason for that is that HMO conversions are controlled in other London Boroughs, so a disproportionate number are set up here.<br><br>I would like the Article 4 direction to   | Support         | As outlined in Section 7 of the Mayor and Cabinet report, it was decided to approve the making a non-immediate article for Article 4 Direction to reduce  |

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|           |           | come into force immediately, or at least much sooner than the proposed date of 7 March 2020.  |                 | the likelihood of compensation claims against Council. |
| <b>11</b> | Whitefoot | HMO's<br>1. Increase in anti-social behaviour<br>2. Homes which are not fit for habitation<br>3. Exploitation of the vulnerable tenant<br>4. Erosion of community spirit<br><br>and must be controlled, by implementing the Article 4.  | Support         | Noted.   |
| <b>12</b> | Whitefoot | There are far too many HMO's popping up on our street. As young, working homeowners, we are considering selling up and moving. Many of our neighbours are feeling the same. This will have a negative impact on the local area which I believe the council are looking to improve.  | General Comment | Noted.   |
| <b>13</b> | Whitefoot | Long overdue,urgently needed.<br><br>Areas are been damaged and run down by high numbers and concentration of hmos .  | Support         | Noted.   |
| <b>14</b> | Whitefoot | They should be stopped, there are far too many.   | General Comment | Noted.   |
| <b>15</b> | Catford   | Unfortunately HMO's have already destroyed our local community and atmosphere in our area. We have one next door and they have filled the house with ex drug addicts who frighten my family members, and other members of the street. One member of the HMO resorted back to drugs and set the house on fire, terrifying my daughter, and made us feel unsafe in our home. We have also | General Comment | Noted.   |

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|           |           | had them knocking on our door in the middle of the night asking for money and cigarettes and alcohol. There are ambulances and police outside the house every other week in the middle of the night, waking us who have to go to work the next day. The whole community feel like they are being pushed out of the neighbourhood and feel the council is not trying to protect our families.   |                 |   |
| <b>16</b> | Whitefoot | Hope it improves the look of the area. Some landlords don't maintain the area they rent and tenants aren't interested in doing so. It's making the local area look very untidy   | General Comment | Noted.  |
| <b>17</b> | Whitefoot | I would be on favour of bringing this Direction into force as soon as possible. My own experience with the two HMOs on my street has been poor - one HMO was used for illegal activity (and was raided by police) and the other has piles of garbage in front, which spills into the street.   | Support         | Noted.  |
| <b>18</b> | Whitefoot | <p>I agree that the number of HMOs in the area is out of proportion and would like to see a complete freeze on the conversion of houses into to HMOs full stop. I don't think the proposed Article 4 Direction goes far enough.</p> <p>What about those who have already been granted planning permission or in the process of applying?</p> <p>The neighbourhoods consists of families, many of which have vulnerable members.</p> <p>The quality and upkeep of the HMOs that exist on my road are awful. The</p> | General Comment | Part of this concern was addressed in response to point 9 above. Also, the extension of the mandatory licensing scheme will help to address the issue with poor quality HMOs and subsequently drive up standards. |

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|           |           | <p>owners have no interest in the tenants or the impact the HMO has on the surrounding community. On my road, tenants lost power because rats had chewed through the cabling and nothing was done until it was highlighted to a neighbour who intervened.</p> <p>There is a lack of housing for families in Lewisham, Family homes should NOT be converted into multi-occupancy residences full stop. The area is already deprived. Don't make it worse.</p>   |         |        |
| <b>19</b> | Whitefoot | <p>I think there should be planning permission required - there a few we are aware of that definitely have antisocial activity and we are concerned for those living next door etc and also for our children playing outside on our road. We know people need housing but HMO should be regulated so that the residents are not exploited and the neighbourhood negatively impacted.</p>   | Support | Noted. |
| <b>20</b> | Whitefoot | <p>I support this proposal. I believe in affordable housing and protecting vulnerable citizens but I am concerned about the quality of accommodation that can come out of converting what are mainly small single family homes into chopped up apartments that will likely have access to only one shared toilet. This area of suburbia was designed with single families in mind and basic things like waste bins and suage disposal (often of 1930s quality) are not sustainable for excessive use in the households.</p> <p>There has been a huge increase in housing in Whitefoot with the</p> | Support | Noted. |

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|           |           | Excalibur construction and Catford has seen a great increase in new build housing. Other more affluent parts of the borough (Brockley, Ladywell, Forest Hill), with larger and nicer houses that are spaced further apart would be better suited for the HMO purposes.   |                 |        |
| <b>21</b> | Catford   | We want control on the explosion of HMOs   | General Comment | Noted. |
| <b>22</b> | Whitefoot | I support the use of article 4 to limit the number of HMO's appearing in the ward. These are mostly small terrace house which are not suitable for multiple occupancy. It is unfair on the tenant to expect them to live and pay rent to reside in sub standard accommodation. For neighbours it has meant more noise, more anti-social and drug dealing is clearly evident. Houses are also being modified and look out of character with those around them.  | Support         | Noted. |
| <b>23</b> | Whitefoot | I think there is a real need to monitor single dwelling houses from being turned into HMOs. So I fully support Article 4 direction on small HMOs in Lewisham southern wards. I live three doors away from two houses that have multiple tenants and sadly there is nothing but problems from these two houses. This includes antisocial behaviour, issues with rubbish -not enough bins being provided for the amount of people living in each property. Also the landlords of some of these properties have no interest in keeping the houses in a good state as the turnover of tenants is so great. Sadly the majority are in desperate need of housing so will take anything that is available. I would also support | Support         | Noted. |

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|    |           | a move towards monitoring existing properties that have already been developed in this way.  |         |        |
| 24 | Whitefoot | <p>Dear Lewisham Council, it has recently been brought to our attention you are contemplating the introduction of Article 4 in relation to small HMO's within certain Lewisham wards.</p> <p>Personally, as a homeowner living within one the flagged wards, this would be greatly welcomed.</p> <p>Whilst we understand the country as a whole are struggling to meet the requirements of housing people, surely it is prudent that this is done in a managed way to ensure existing communities are not changed by the blight of ever increasing HMO's to once established family areas.</p> <p>We are proud life-long Lewisham residents and business owners within the borough. In our formative years, we lived in Deptford - its mixed housing stock, people of all ages and backgrounds formed a wonderful foundation. After nearly two decades and in a position to purchase our own home, it was our strong wish to remain within the borough, purposely choosing to locate to the quieter family orientated <b>XX</b></p> <p>After several years we, like so many others, have invested a great deal of time, money and effort in our home – we have an established community, friendly neighbours, an area to be proud off.</p> <p>With the ever-increasing numbers of HMO's, it feels like this community is being fractured. Often HMO tenants unfortunately do not simply blend in to the community - there is the</p> | Support | Noted. |

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|           |           | <p>constant coming and going of new occupants. As a generalisation, abodes are transformed from family units to crude factory-farm like premises - the evidence of which can often be seen by the overflowing bins. These sites, tend to look rundown, disheveled, unloved and unkempt – which is hardly surprising when the LL is looking to maximising their rental yield.</p> <p>We very much hope that you, Lewisham Council, are able to permanently put steps in place to manage the already overconcentration of HMO's within the area.</p> <p>Kind Regards <b>XX</b></p> |         |        |
| <b>25</b> | Whitefoot | <p>Yes. I think it's a great idea. The rubbish spilling out of the bins outside 3 of the HMOs on our street, <b>XX</b>, is simply out of control and often blocks the pavement altogether, meaning I have to push my buggy along on the road. The properties are all run down, and there has been a noted increase in anti social behaviour since a new halfway house was established (namely my and my neighbours' cars being broken into).</p>   | Support | Noted. |
| <b>26</b> | Whitefoot | <p>I agree with the proposal to restrict development of HMOs in these areas.</p>   | Support | Noted. |
| <b>27</b> | Whitefoot | <p>I support the Article 4 Direction.</p> <p>We live next door to a house that used to be a family home and now has unrelated renters. The increase in noise has been an issue.</p> <p>There are several HMOs in our street.</p>   | Support | Noted. |

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|           |           | <p>They are unmaintained properties and look like slums. Rubbish is scattered around them and the bins overflow causing a health hazard. I have personally witnessed a drug deal taking place outside them.</p> <p>This is not an appropriate area for HMOs, children have to walk by these houses daily. It is a family area and not suitable for transient and challenged residents. These people need to live somewhere, but it should be an area with appropriate support in place, not a family street.</p> <p>This Article 4 Direction is essential for this area.</p> |         |        |
| <b>28</b> | Whitefoot | <p>Most houses in these wards are unsuitable for HMOs.</p> <p>They are usually small family homes consisting of 2 or 3 bedrooms in tightly knit communities. Adapting these to HMOs has so far benefitting nobody except greedy, selfish, profitmaking landlords/owners, who are never contactable when problems arise.</p> <p>The sooner this problem is resolved the better.</p> <p>Why does this need to wait till 7 March next year!!!!<br/>It needs to be implemented NOW!</p>  | Support | Noted. |
| <b>29</b> | Whitefoot | I agree with the council and they should be stopped  | Support | Noted. |
| <b>30</b> | Whitefoot | I moved into <b>XX XX</b> on <b>XX XX</b> and had no idea prior to this that the neighbouring property <b>XX</b> is an HMO with 6 flats. It has been a most  | Support | Noted. |

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|           |           | <p>unwelcome surprise.</p> <p>The residents are perfectly agreeable but the property is just not suitable to house so many people. The walls are paper thin and we hear constant noise.</p> <p>It has made our lives pretty miserable and we will be forced to go through the stress and expense of moving far sooner than we originally planned.</p> <p>It may be too late for us but the rules need to be changed.</p> <p>Kind regards<br/><b>XX</b></p>   |         |        |
| <b>31</b> | Downham   | It's becoming quite a problem. I live on Further Green and there are at least 3 houses on the road which seemed over crowded, rundown and dirty. It is very confusing and a problem.   | Comment | Noted. |
| <b>32</b> | Whitefoot | The uncontrolled proliferation of HMOs is resulting in hotspots emerging such as Oak Cottage Close, which has overnight seen a huge growth in incidents of housefires requiring fire brigade attendance, antisocial behaviour and noise nuisance, and unlicensed debt collectors hammering on doors in the middle of the night. There is an urgent need for HMO conversion to become subject to planning approval in order for the council to exercise control over the distribution and design of HMOs. | Support | Noted. |
| <b>33</b> | Whitefoot | I think its a good idea. Too many HMOs in the area. Houses are not   | Support | Noted. |

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|    |                                      | looked after and bring the look of the neighbourhood down.  |           |  |
| 34 | Whitefoot                            | Ask yourself would you like an HMO next door door to your house No of course you wouldn't so why do the councillors allow this to go on .Your all guilty allowing these HMO to go ahead with never a thought to who you are upsetting in South Park Crescent we are surrounded with them Thankyou very much I hope they get permission in your street.Article 4 a bit like shutting the stable door after the horse has bolted. Should of been done years ago | Comment   | Please see response to point 9.  |
|    | <b>Organisations</b>                 |   |           |  |
| 35 | Residents Landlord Association (RLA) | Certain sections of the community need HMO accommodation in small HMOs, only the PRS provides this kind of accommodation. Tenants needing this kind of accommodation can only find it by renting from a private landlord. As Class C4 is directed solely at the PRS imposing an Article 4 Direction to restrict/ban small HMOs will have a direct impact on supply. If supply is reduced, this will have the consequence of driving up rent levels.           | Objection | It is accepted that HMO's can be an important source of low cost, private sector housing for those on low incomes, students and those seeking temporary accommodation as part of a balanced mix of housing.<br><br>However, Lewisham's southern wards which have traditionally had the lowest proportion of HMO's in the borough are |

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|           |     |   |           | <p>unsuitable locations for high concentrations of HMO's due to their:</p> <ul style="list-style-type: none"> <li>-High levels of deprivation</li> <li>-Poor public transport accessibility</li> <li>-Suburban character with a high concentration of family homes</li> </ul>   |
| <b>38</b> | RLA | <p>These restrictions do nothing to reverse the negative impact shared houses can have on an area if anything they put areas without an HMO Population at higher risk as new HMOs will be on the lookout for new areas</p>  | Objection | <p>We consulted neighbouring boroughs and received no objections or concerns.</p>   |
| <b>39</b> | RLA | <p>It is the RLA's view that restrictive planning policies coupled with Article 4 directions will prove to be a grave disservice to local economies and communities. Proposals such as those for Article 4 directions are often measured by residents in a local community calling for such measures. By acceding such calls, Lewisham council is overlooking the overall economic and housing needs for the borough.</p> | Objection | <p>Article 4 directions should not be interpreted as a restrictive planning policy; it is rather a mechanism to better manage and monitor the impact of HMOs. Similarly, then, this Article 4 direction does not overlook the diverse needs of HMOs but instead aims to ensure a better balance between residents seeking HMOs with those seeking family dwellings.</p> |

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| 40 | RLA | Instead of local authorities adopting this new form of regulation, it would be better to address problems that may occur where there are high concentrates of HMOs through other existing wide range of powers at their disposal, including those used for tackling anti-social behaviour and waste disposal. | Objection | <p>This Article 4 direction is not being introduced in isolation. It is a planning initiative that complements the work our licensing and private rented sector team aiming to drive up standards within the HMO market.</p> <p>The assertion that article 4 directions are a disservice to local economies is unsubstantiated; LA's who have already implemented an Article 4 direction on small HMOs within the past ten years have not reported a negative local economic impact.</p> |
| 41 | RLA | Existing HMOs come in all shapes and sizes. Often, they are older larger properties which are now too big and have been sub-divided. The traditional bedsit, however, has been in decline. Often concerns centre on shared houses lived in by groups of younger people.                                       | Objection | Section 3 HMO Research and Evidence Paper acknowledges and makes clear the diversity of HMO market and the needs it serves.  |
| 42 | RLA | The Use Classes are based on the concept of the family but in many respects particularly with this kind of accommodation, the concept of family communities is out of date  | Objection | The Council is not responsible for defining land use classes – this is set by the MHCLG.   |

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| 43 | RLA | families have moved away from these properties, as they no longer meet their needs. Instead, private landlords have invested substantially in these properties and have sustained the areas rather than allowing them to become derelict.   | Objection | Article 4 directions do not prevent landlords from investing in disused family dwelling housing. Under this Article 4 direction family dwelling housing can still be converted into small HMOs providing they meet the criteria set out in DM policy 6, or any other relevant policy in the local plan at the time. |
| 44 | RLA | Article 4 Direction will reduce the supply of small HMOs in areas where there are demand and a need for them. As always with the law of supply and demand, this will lead to increases in rents in those areas, particularly if they are close to places of work such as for example hospitals. Pushing up rental levels will not help those who want this kind of accommodation  | Objection | It is not the aim of the Article 4 direction to reduce the supply of HMOs but rather ensure future supply is located in appropriate areas and avoids overconcentration.   |
| 45 | RLA | One of the problems of spreading HMOs around the towns and cities is the adverse impact on the environment. Now, they tend to be concentrated e.g. near to local universities and hospitals. Where student accommodation is close to a university or college, students are able to walk and easily access such institutions. If instead, HMOs are located around a city then there will be increasing demand for travel by car to get to their place of work or | Objection | The intention of this Article 4 direction is to ensure small HMO are located in areas with good public transport accessibility and, therefore, have a positive environmental impact by a reducing reliance on cars.   |

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|           |   | college. It is not a very desirable consequence use of Article powers   |           |   |
| <b>46</b> | RLA                                     | If there are difficulties in an area, local authorities already have other extensive other powers to deal with, for example, anti-social behaviour and waste management. Lewisham council can work with private landlords to deal with these concerns wherever they arise. Very importantly, these can have an immediate impact rather than waiting for much longer planning processes to operate, if they work at all. Accreditation schemes for local landlords can also be utilised and used in conjunction in tackling the issues cited in the Review and Evidence Paper put forward as part of the consultation process. | Objection | The council is using its other powers - please see response to point 40.  |
|           | National Approved Letting Scheme (NALS) |   |           |   |
| <b>49</b> | NALS                                    | We welcome the detailed nature of the council's evidence base and the acknowledgement that a borough wide HMO Article 4 Direction cannot be justified based on available evidence at the current time.  | Noted.    |   |
| <b>50</b> | NALS                                    | We note the council's admission that there is currently no local enforcement plan in place and that the council currently operates their planning enforcement activity under a charter which indicates unauthorised conversions would be categorised as Priority 2. Within the report there is no link to the charter and so it is unclear what this means in practice. If  | Noted.    | We do have a regime in place with respect to planning enforcement - planning service enforcement Charter, Aril 2013. In addition, the HMO licensing scheme requires |

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|    |      | <p>the council is to strengthen planning restrictions for new HMOs, it is important that there is an appropriate enforcement regime in place. Otherwise, compliant landlords and agents will comply the requirements whilst rogue operators continue to operate in breach of the law with limited risk of enforcement action being taken.</p>  |         | <p>such HMOs to be licensed in any event (5 occupants or more) and any which seek a license after the introduction of the Article 4 can be investigated by referral from PSH.</p>  |
| 51 | NALS | <p>The report notes that most HMOs occupied by five or more people now require licensing, regardless of the number of storeys, following the change to the licensing rules on 1 October 2018. Lewisham have gone further by requiring all HMOs above commercial premises to be licensed. As such, an enforcement regime is already in place for a significant proportion of HMOs in the borough.</p> | Noted.  | <p>Please see response to point 40.</p>  |
| 52 | NALS | <p>Whilst census data indicates an increase in shared accommodation between 2001 and 2011, this still equates to just 1% of the housing stock which indicates a relatively low level. Of the three wards highlighted with the largest increase, none of them are the wards where an HMO Article 4 Direction is being proposed.</p>   | Comment | <p>Paragraph 5.1 of the research evidence paper infers census data should be treated with caution as it is <i>"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."</i></p> |

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| 53 | NALS | <p>In addition, data on wards and individual streets with the highest concentration of licensed HMOs does not correlate to the four wards in the south of the borough and no ward is shown as having more than 39 licensed HMOs. The four southern wards combined account for just 15 licensed HMOs, less than 6% of all licensed HMOs in the borough, which is below average when compared to all wards.</p> | Commented | <p>It is worth mentioning that the HMO research and evidence paper must be read and interpreted as a whole rather than take single facts out of context and drawing conclusions.</p> <p>Licensing data does not give a full picture of the quantity of HMOs as it only included HMOs with 5 or more people over 3 floors and HMOs above commercial premises.</p> <p>Yes, it can be observed the streets with the highest number of HMOs were New Cross, however, the justification for an Article 4 Direction is not to prevent the conversion to HMOs in areas where they are most prominent. The rationale to introduce an Article 4 Direction in the southern wards was outlined in the conclusion of the</p> |
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|    |      |   |           | research and evidence paper.  |
| 54 | NALS | <p>Council Tax data included in the report indicates the total number of HMOs decreased by 9% between 2015 and 2018, whilst the number of private rented HMOs had decreased by a larger 16%. Once again, the wards with the highest concentration of HMOs according to Council Tax records does not correlate to the four wards in the south of the borough. Whilst Bromley Road has moved into the top 3 streets with the most Council Tax recorded HMOs, we understand it is a very long road and so 12 HMOs along its entire length is not exceptionally high. The four southern wards combined account for just 15% of all Council Tax recorded HMOs in the borough, which is below average for the borough</p> | Objection | <p>Please see the above response. Furthermore, paragraph 6.10 of HMO research and evidence paper infers council tax records should be treated with caution owing to inaccuracies identified in the street survey.</p> |
| 55 | NALS | <p>Data from the planning enforcement team shows a significant 80% reduction in HMO enforcement cases between 2015 and 2017, with just 11 cases throughout the borough in 2017.</p>   | Objection | <p>Paragraph 5.30 of the evidence and research paper dealt with this point.</p>   |
| 56 | NALS | <p>Housing benefits data only identifies 65 HMOs borough wide and whilst it indicates 40 HMOs across two of the southern boroughs, this remains a relatively low level and there is no indication that these properties are clustered in a particular part of the ward. We note there were no benefit</p>   | Objection | <p>The justification to introduce an article 4 direction in the wards Grove Park and Downham was outlined in section 8</p>  |

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|    |      | claims associated with HMOs in Downham and only 1 in Grove Park, which indicates very few HB-tenants living in HMOs in those wards  |           | of HMO evidence and Review Paper.   |
| 57 | NALS | We note that the data summarised in the report has been further strengthened by a street survey conducted over three days in January 2018 in Bellingham, Downham and Whitefoot but not in Grove Park. It is not known how the addresses were selected or whether this was a random sample.  | Objection | Fourteen streets were visited in 3 wards selected due to community reports of nuisance and from previous work carried out by the planning team in 2016 which highlighted that there was a high number of houses converted into two story HMO's in these areas. The Crime Enforcement & Regulations team has also reported a concentration of properties with occupants using some shared facilities in properties in these areas. |
| 58 | NALS | It is not known how the addresses [from the Street Survey] were selected or whether this was a random sample. During these visits, access was gained to 1,123 properties which identified 78 HMOs, comprising approximately 7% of the properties visited. The report does not specify how these 78 HMOs were distributed across the three wards and whether any high concentrations were identified in particular areas within those wards. | Objection | Please see the response to point 57.  |

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| 59 | NALS | The street survey results were accompanied by qualitative feedback indicating high levels of satisfaction in Downham and reasonable levels of satisfaction in Whitefoot. Only in Bellingham were there concerns about fly-tipping, ASB and crime, although there is no other published qualitative or quantitative data to draw any conclusions of a causative link or correlation with HMOs in that locality.                | Objection | Agreed, however, we included the Grove Park and Downham to avoid displacing unmanaged growth of HMOs to these areas. Please also see the response to point 56. |
| 60 | NALS | The report notes that some HMO occupants had been released from prison, suffered from substance abuse or mental health issues and were placed there by other boroughs or charities. There is no indication how many of the 78 HMOs fell into this category and we would argue this is more of a housing management rather than planning issue. There is no indication these properties were in poor repair or poorly managed. | Objection | Please see the response to point 40.   |
| 61 | NALS | We understand there was a small amount of consultation with seven local residents, although do not think the sample size is statistically significant to draw any conclusions. We note there is no mention of any associated discussion with landlord and letting agent associations, or landlords and agents operating within that locality.   | Objection | Landlords and letting agents have had an opportunity to respond to this consultation.  |
| 62 | NALS | Examining the data sets in more detail identifies no high concentration of HMOs in the southern four wards. We have taken the opportunity to summarise the situation on a ward by ward basis below: Grove Park. Census shows shared accommodation significantly below the borough   | Objection | The Ministry of Housing Communities and Local Government have been notified regarding the Article 4 Direction and raised no objections                         |

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|    |      | average, HMOs identified from HMO licensing and Council Tax data are both below the borough average, HB data identified just one HMO, there has only been one HMO planning enforcement case and the council has not undertaken any street survey in this ward. As such, we do not believe this meets the evidence test needed to introduce an HMO Article 4 Direction.   |           | to the evidence base.  |
| 63 | NALS | We believe the evidence base is also weak for Downham. Census shows shared accommodation significantly below the borough average, HMOs identified from HMO licensing and Council Tax data are both significantly below the borough average and there were no HMO planning enforcement cases. Whilst there has been a street survey in this ward, the council has not revealed how many HMOs were identified in this ward and whether there were any pockets within the ward that demonstrate a high concentration of HMOs. | Objection | <p>There not being data to indicate a growth of small HMOs in Downham does not undermine the reason for the Article 4 Direction to apply here.</p> <p>The justification for its inclusion was to avoid displacing the growth of small HMOs to the adjacent ward which has also traditionally had the lowest proportion of HMO's in the borough and are unsuitable locations for high concentrations of HMO's due to their:</p> <ul style="list-style-type: none"> <li>• High levels of deprivation</li> <li>• Poor public transport accessibility</li> <li>• Suburban character with a high</li> </ul> |

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|    |      |   |           | concentration of family homes   |
| 64 | NALS | These results do not correlate with the conclusion in para 9.2 of the council's report that says there has been a substantial increase in HMOs in the four southern wards. At most, there has been an increase in two wards, but this is taken from very low baseline data. | Objection | Paragraph 9.2 did not say 'there has been a substantial increase in HMOs within the boroughs 4 southern wards'. This is a misquotation. However, it is agreed the sentence could have been more explicit that the increase only pertains to Bellingham and Whitefoot. |