



Report for:	Cabinet 18 September 2012	Item Number:	
Title:	Declaration of an Article 4 Direction for Houses in Multiple Occupation (HMOs) in East Haringey		
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Lead Officer:	Nick Powell, Head of Carbon Management and Sustainability		
Ward(s) affected: Seven Sisters, Tottenham Green, Tottenham Hale, West Green, Bruce Grove, White Hart Lane, Northumberland Park, Noel Park, Woodside, Bounds Green, Haringay and St Ann's.	Report for Key/Non Key Decisions:		

1. Describe the issue under consideration

- 1.1 A House in Multiple Occupation (HMO) is a single family dwelling where facilities such as bathroom or kitchen are shared by three or more unrelated individuals. Current planning legislation allows a family dwelling (Use Class C3) to change to a small HMO of three to six people (Use Class C4) without planning permission.
- 1.2 This report proposes the use of an Article 4 Direction to withdraw these 'permitted development rights' to enable the Council to better manage the impact of small HMOs, ensure they are of a high standard if and where they are approved, and protect the important stock of family accommodation. This proposal will be supported by new Development Management Plan policies against which planning applications for HMOs will be determined.
- 1.3 This proposal is one of a suite of tools available to the Council to raise standards in the private sector.
- 1.4 Furthermore, the proposal will support the presumption in favour of sustainable development as set out in the recently published National Planning Policy Framework (NPPF) by asking for planning applications to be made to change from a family dwelling to a small HMO.



1.5 The evidence to support this proposal is set out in Appendix 2 of this Report.

2. Cabinet Member introduction

2.1 In Haringey there is growing concern that there is a loss of family accommodation and a growing over-concentration of HMOs often offering low quality accommodation for occupiers and reducing the availability of family housing in the rental sector. This report sets out a proposal to introduce an Article 4 Direction to manage these issues better. The Article 4 Direction cannot be applied retrospectively meaning that conversions will be permitted right up to the date on which the Direction takes effect; this is anticipated to be later in 2013. However, once it takes effect planning permission *will* be required from the Council before a single family dwelling can be used as small HMO.

2.2 This proposal responds to recommendation of the HMO conference held in November 2011. It also builds on the work that Haringey Council has undertaken over the last three years which has included increased political leadership through the corporate HMO working group, the creation of the planning enforcement team, and more recently additional licensing measures centred on Harringay Ward and proposals for a further additional licensing scheme in Tottenham. This work has also extended to engagement through the landlord accreditation scheme, close partnership working with the police and fire service. Continued partnership working with local communities and organisations will be essential to the overall success of this proposal.

3. Recommendations

- i. note the current joined up partnership working already in place to better manage private sector housing in the borough, as outlined in paragraph 2.2 above;
- ii. make a Direction under Article 4 (1) of the Town and Country Planning (General Permitted Development) Order 1995, as amended, removing permitted development rights for changes of use from use class C3 to use class C4 in the following wards:
 - Seven Sisters;
 - Tottenham Green;
 - Tottenham Hale;
 - West Green;
 - Bruce Grove;
 - White Hart Lane;
 - Northumberland Park;
 - Noel Park;
 - Woodside;
 - Bounds Green;



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- Haringay; and
 - St Ann's.
- iii. specify in the making of the notice a date of not less than 12 months later for it to come into effect;
 - iv. authorise the Director of Place and Sustainability to carry out the statutory procedure for making an Article 4(1) Directions including undertaking the necessary consultation; and
 - v. note that subject to the outcomes of this consultation, a further report will be made to Cabinet to confirm the Direction.

4. Other options considered

- 4.1 **No Article 4 Direction:** The use of single family dwellings as small HMOs would continue to be permitted development and would not be subject to Haringey's planning policies. This is likely to result in a continued expansion of small HMOs and we would not have the ability to apply planning policy requirements for space and amenity standards.
- 4.2 **Voluntary compliance by developers with the Council's planning policies related to HMOs:** While there are many good landlords who would comply, in cases where there was low or no co-operation, the use of single family dwellings as small HMOs would continue to be permitted development and would not be subject to Haringey's planning policies. This would mean that in areas of the borough that have been identified as having poor quality HMO's, occupants would be exposed to low standards of accommodation. It would also mean the overall levels of conversion of family housing could not be monitored.

5. Background information

- 5.1 The private rented sector plays a vital role in helping to meet the growing demand for affordable housing in London, and it provides a flexible tenure choice. Private sector housing accommodates 22% of Haringey's population; this is higher than the average for London (14%) and nationally (9%). Housing in Multiple Occupation (HMO) is an important source of lower cost housing within the private rented sector.
- 5.2 The growing demand for low cost private rented accommodation has unfortunately been exploited by some landlords renting out accommodation which offer very poor living conditions for occupiers and over intensifying the use of small single family dwelling houses. HMO accommodation has been identified by the Council's Private Housing teams as being the subject of a disproportionately high level of complaints about private sector housing particularly in East Haringey (discussed later in this report). Improving HMO standards is therefore a key Council objective.



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- 5.3 In addition, a continued and unchecked expansion in the use of single family dwellings as small HMOs further reduces the availability of family housing – protection of which is also a key Council objective. The Council’s emerging Local Plan Strategic Policies also sets out the Council’s objective to create mixed and balanced communities and seeks to protect family housing and ensure that an adequate mix of dwelling sizes is delivered as part of new developments (Policy SP2 Local Plan: Strategic Policies, 2012). The creation of mixed and balanced communities is also a central aim of the Council’s Housing Strategy (2009- 2019).
- 5.4 In response, the Council is continuing to pursue a holistic multi-agency approach to improving private sector housing involving the police and the fire brigade and cross departmental working encompassing the Council’s planning, enforcement, council tax and housing benefit functions. The Council’s Housing Improvement Team (Private Sector Housing) has already implemented an ‘Additional Licensing Scheme’ for HMOs centred on Harringay Ward requiring the licensing of smaller HMOs and some conversions. A further scheme for five wards in Tottenham is currently being consulted upon.
- 5.5 The Council is also reviewing its existing planning policy approaches related to HMOs which will be subject to consultation as part of Haringey’s Development Management Policies later this year.
- 5.6 This report presents proposals for the implementation of an Article 4 Direction to bring small HMO development under planning control. This represents just one element of a wider programme of work to improve standards in the private sector generally, and for HMOs in particular, and to ensure the protection and expansion of family housing.

HMOs - what can Planning Policy do?

- 5.7 The London Plan 2011 Policy 3.8 advocates that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. It identifies HMOs as a strategically important part of London’s housing offer and advocates their protection where they are of reasonable standard. The London Plan 2011 also requires that in considering proposals which might constrain HMO 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 HMOs.
- 5.8 Haringey’s Unitary Development Plan (UDP), 2006 Policy HSG6 Houses in Multiple Occupation (set out in Appendix 1) highlights the role of HMOs in meeting housing need and seeks to ensure they are of an appropriate size and appropriately located. It also seeks to manage their impacts on the character and amenity of surrounding areas. Critically, it seeks to ensure that HMO accommodation is limited to single family dwellings of over 120 square metres and only takes place outside of restricted conversion areas and areas where there are already more than



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20% of properties in HMO use. The Council's Housing Standards Supplementary Planning Document (2008) provides further guidance on the application of this policy).

- 5.9 At present the Council has **no control** over the use of single family dwelling houses as small HMOs. This is because a family dwelling (Use Class C3) can now change to a small HMO with up to six people (Use Class C4) as “permitted development”, i.e. without the need for planning permission. The Government has recognised that there are some exceptional local circumstances in which Local Authorities may wish to withdraw these permitted development rights. The mechanism through which this is achieved is an Article 4 Direction. The effect of an Article 4 Direction is not to prevent future HMO development; but to make it subject to the need for planning permission and therefore the assessment against relevant planning policies in the Local Plan.
- 5.10 Whilst well managed HMOs provide housing flexibility and meet the need for low cost rental accommodation, the over concentration of this type of use can lead to reductions in the availability of family housing. At present UDP 2006 policy related to small HMOs or indeed future planning policies related to HMOs cannot be applied to small HMOs as they are permitted development. The proposal outlined in the remainder of this report for an Article 4 Direction would control the development of small HMOs by requiring planning permission for their change of use from a single family dwelling. In doing so, this would support the presumption in favour of sustainable development, as set out in the recently published NPPF.

HMOs - what can Licensing do?

- 5.11 The 2004 Housing Act introduced the mandatory licensing of privately rented homes that have three or more storeys and are occupied by five or more people forming two or more households. The owner of a HMO which meets these criteria has a legal obligation to apply to the local authority for a licence.
- 5.12 Licensing enables a local authority to control to some extent the standards of accommodation in HMOs and the management of those HMOs, and also allows the authority to refuse a licence where relevant standards are not met. The Act also gave local authorities the power to designate additional licensing schemes requiring the licensing of smaller HMOs and some conversions where a local authority consider that a large percentage of non-mandatory licensable HMOs in an area are being managed badly, and that this is causing problems for the tenants of those HMOs or is having a detrimental effect on the neighbourhood in some way.
- 5.13 The Council has operated an Additional Licensing Scheme centred on Haringay Ward since 1 October 2011 and is currently consulting on the designation of a scheme to introduce a further Additional Licensing Scheme within the following wards: Northumberland Park; Bruce Grove ; Tottenham Green; Tottenham Hale;



Seven Sisters (see map 1 below for the proposed extent). This consultation closes on 28 September 2012.

Justification for HMO Article 4 Direction

5.14 The National Planning Policy Framework (NPPF), 2012 states that the use of Article 4 Directions should be limited to situations where this is *necessary to protect local amenity or the wellbeing of the area and using an Article 4 Direction power must support the presumption in favour of sustainable development* (paragraph 200). Further Government Guidance on the use of Article 4 Directions is set out in Replacement Appendix D to Circular 9/95: General Development Consolidation Order 1995, revised June 2012 (Circular 9/95). Circular 9/95 stipulates that planning authorities should only consider making Article 4 Directions *in exceptional circumstances where evidence suggests that the exercise of permitted development rights would harm local amenity or the proper planning of an area. In so doing they should identify clearly the potential harm that the direction is intended to address* (paragraph 2.1).

5.15 An assessment of HMO development in Haringey reveals evidence of the following issues:

- A. There is an over concentration of HMO accommodation in east Haringey, this effect is compounded in some areas by the already high level of house conversions to self contained flats, resulting in a loss of single family dwelling houses.**

In Harringay ward 40% of the housing stock along the roads in the Haringey Ladder has changed from single family dwellings into self contained smaller units or use as a House in Multiple Occupation (HMO). The extent of conversions is not limited to Harringay ward, there are already indications of higher numbers of conversions of family units to HMO's elsewhere in Haringey and it is estimated that there could be up to 10,000 HMOs in Haringey (Haringey Housing Standards Supplementary Planning Document, 2008).

Larger HMO's are spread throughout the borough with a particular concentration in Harringay ward which also has the highest number of Mandatory licensed HMOs¹ 64 of a total of 271 (July 2011). Identifying the location of smaller HMOs is more difficult due to the absence of a requirement for the licensing of or planning permission for small HMOs. However, Council Tax data on properties classed as HMOs, planning applications and analysis of names on the Electoral Register and Council Tax register indicate the presence of a significant concentration of HMO development across east Haringey (see Appendix 2, Figure 4).

¹ Mandatory HMO licensing applies to the whole of England and Wales and requires the licensing of an HMO if: it comprises 3 or more storeys; it is occupied by 5 or more persons living in 2 or more households; and it is not fully converted into self-contained units of accommodation.



B. The quality of some HMO accommodation is low and frequently provides a very poor standard of accommodation for occupiers.

From 2006 – July 2012, a total of 686 complaints about HMOs were received by the Council's Housing Improvement team. These were overwhelmingly centred on wards in east Haringey where the housing sizes are typically smaller than west Haringey and levels of owner occupancy are lower. Complaints were highest in Harringay ward where the number and density of HMOs is highest. The poor conditions of HMO development in Harringay ward has already prompted the introduction of an Additional Licensing Scheme under the Housing Act 2004, with a further scheme proposed for wards in Tottenham (the boundaries of these schemes are shown on Map 1 below). Planning enforcement action related to HMOs (and the related issue of house conversions) is overwhelmingly concentrated in east Haringey (see Appendix 2, Figure 8).

C. The clustering of HMO accommodation has an adverse impact on the amenity and wellbeing of surrounding occupiers.

The Government published a report in 2010, 'Evidence Gathering – Housing in Multiple Occupation and possible planning response', which sets out how to respond to the challenges of high concentrations of HMOs. The report identifies various impacts that occur as a result of high concentrations of HMOs, including noise and nuisance, anti-social behaviour, and imbalanced and unsustainable communities. Research undertaken to support the introduction of the Additional Licensing Scheme for HMOs in Haringey Ward in 2011 highlighted issues of noise and illegal dumping often associated with high concentrations of private sector rented housing.

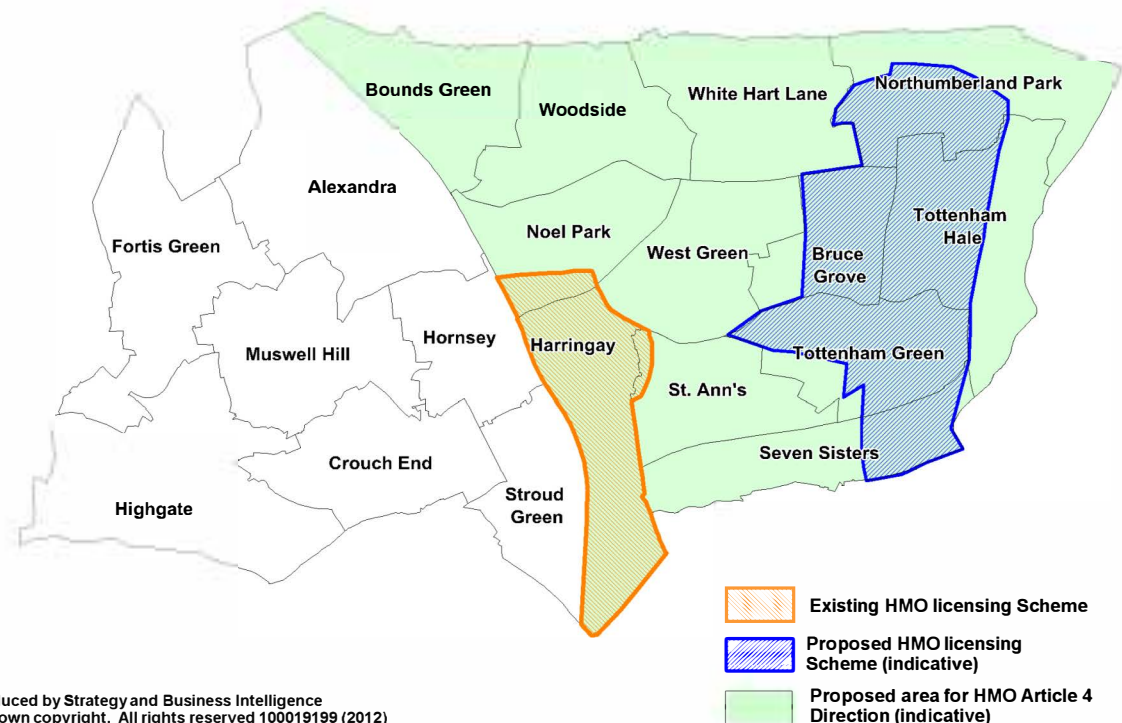
5.16 Further evidence related to points (A) to (C) above is included in Appendix 2.

5.17 The issues outlined in paragraph 5.6 combine to create a particularly acute planning problem in east Haringey which is impeding the Council's objectives (as discussed in paragraphs 5.5 to 5.7 above). Specifically, unrestricted conversion of family houses to small HMOs in east Haringey is causing harm by producing communities within which there is a lack of balance in housing mix, and placing additional housing pressure on existing family housing through unrestricted conversions and resulting in poor standards of accommodation. These effects are contrary to the Council's own planning policy and housing strategy objectives which are to ensure:

- (1) mixed and balanced communities and the protection of family housing
- (2) high quality HMO accommodation that provides a good standard of accommodation for occupiers.



- 5.18 There is a current and projected demand for family housing and a need to protect single family dwelling houses. Parallel to (and to some extent competing with this) this there is an increased demand for low cost HMO accommodation – partly fuelled by changes to housing benefit which will mean 25 – 35 years olds will be moved to the shared accommodation rate. This raises the risk of an even greater clustering and over concentration of HMOs and over intensification in the use of individual dwellings.
- 5.19 The exceptional circumstances – required in the Government’s NPPF, 2012 to justify an Article 4 Direction – are set out in the evidence in Appendix 2 and it is recommended that an Article 4 Direction to remove permitted development rights for small HMOs (C4 Use Class) is implemented in east Haringey.
- 5.20 The evidence set out in Appendix 2 identifies those wards where there is an over concentration of HMOs and the problems associated with their clustering, such as, the loss of family housing, noise and disturbance. The proposed extent of the Article 4 Direction is all wards east of the East Coast Railway line as illustrated below. Making this Direction will support the presumption in favour of sustainable development because it will require planning applications to be made from a C3 (dwelling house) to a C4 (small HMO).



Map 1: Proposed Extent of Article 4 Area related to Small HMOs (Planning Use Class C4) and Existing and Proposed Additional Licensing Scheme (under the Housing Act 2004)



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5.21 The Article 4 Direction could complement the Additional Licensing measures currently in place in Haringey ward and proposed in Tottenham which seek to ensure *existing* HMOs are of an acceptable standard and offer a good living environment for occupiers.

Procedural Risks and Costs

5.22 In procedural terms there are two main types of Article 4 Direction that can be made:

- Immediate directions where permitted development rights are withdrawn with immediate effect; and
- Non-immediate directions where permitted development rights are only withdrawn *after consultation* and upon confirmation of the direction.

5.23 For a period of up to 12 months from making an Article 4 Direction, compensation may be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. However, if twelve months prior notice of the withdrawal of permitted development rights is given then there is no ability to claim compensation. Government guidance is clear on this point and states:

“Compensation may only be claimed if an application for planning permission is submitted within 12 months following the effective date of the direction (and, if 12 months prior notice of the withdrawal of permitted development rights is given, there is no ability to claim compensation” (Replacement Appendix D to Circular 9/95: General Development Consolidation Order 1995 (June 2012), paragraph 6.5)

5.24 The likely level of compensation risk arising from making an Article 4 Direction without this notice period in Haringey is difficult to quantify given the extent of the area. This is because there is risk of claims for compensation whenever a developer can demonstrate an *intention* to make use of permitted development rights that allow a single family dwelling to be used as a HMO. The level of compensation claim is difficult to estimate but could be into the millions of pounds.

5.25 The advantages and disadvantages of the immediate and non immediate are summarised below:

Immediate Direction	Non-Immediate Direction
Advantages	Advantages
The control over small HMOs is immediate.	If a 12-month notice period is employed there is no risk of compensation claims.
Disadvantages	Disadvantages
Exposes the Council to compensation claims for a 12 month period.	No ability to exercise control for the duration of the notice period and could encourage the use of permitted



	development rights and accordingly increase the number of small HMOs during this period.
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5.26 Under the Article 4 Direction, any planning fees associated with planning applications for a change of use from single family dwellings to small HMOs **cannot** be collected. Enforcement action (prosecutions and issue of enforcement notices) often leads to compliance with the limitation on a small HMO C4 use. At present this attracts a fee; often the investigation alone will precipitate compliance and a change to a small HMO. It is estimated that there could be as many as 30 planning applications per year² within the Article 4 area which would not generate a fee. Based on the fee for planning applications (or certificates of lawful development) related to large HMO this would equate to a loss of fees of £10,050. The costs of processing these applications would need to be absorbed in full by the Council. Additional enforcement action will also be needed. For the first 2 to 3 years this will be funded by a one off additional revenue allocation (see paragraph 6.1).

5.27 In addition to the cost of processing applications there will be a need for sustained resourcing of the planning enforcement team to ensure effective implementation. The move towards a more integrated enforcement action between the Council’s planning and licensing functions is likely to increase workloads from referrals for planning enforcement action.

Process for Introducing HMO Article 4 Direction

5.28 An indicative timescale for introducing an Article 4 Direction, allowing for a non immediate 12 month notice period, is presented below.

Timeframe	Task
September / October 2012:	Make the Article 4 Direction giving local and national notice and consulting for 6 weeks. Consultation will be designed to meet statutory requirements and Replacement Appendix D to Circular 9/95: General Development Consolidation Order 1995, revised June 2012 (Circular 9/95 and will be undertaken in line with the Council’s Statement of Community Involvement (2011). Opportunities for joint consultation with the concurrent proposals for an additional licensing scheme in Tottenham will be undertaken where appropriate.
Late 2012/	Report to Cabinet on results of consultation and after taking into

² In 2011, the Council received 5 planning applications related to change of use of single family dwellings to HMOs in 2011, but based on enforcement investigations it is estimated this number could expand significantly. Newham Council are rolling out a borough wide direction to removed permitted development rights for HMOs and have estimated an additional 50 additional planning applications.



Early 2013:	account the consultation responses a decision will be taken on whether to confirm that the Article 4 Direction will come into effect
Autumn 2013 onwards:	Once the Article 4 Direction takes effect, regularly monitor and review the appropriateness of the Article 4 Direction, considering whether the original rationale for the directions remains valid.

5.29 As indicated above, the process for introducing an Article 4 Direction includes a requirement for a (minimum) six week public consultation. There is a requirement to repeat consultation, prior to confirmation, if there are significant changes to the proposed Article 4 Direction.

Benefits and Limitations

5.30 The effect of the Article 4 Direction is that planning permission will be required for use of a single family dwelling as a small HMO. It will not mean that such planning applications for small HMOs will necessarily be refused, but it will be subject to the need for planning permission.

5.31 It is important to be aware of the limitations of the Article 4 Direction; these are listed below.

- The Article 4 Direction cannot be applied retrospectively to existing HMO development and permitted developments rights can be used right up to the date on which the notice takes effect (estimated to be Autumn 2013). This means that the impacts of the Article 4 Direction will not be immediate;
- The Article 4 Direction does not apply to the related but distinct issues of house conversions; these are already subject to the need for planning permission and will be determined by the Council in the usual way.

5.32 The Article 4 Direction *will* however allow greater control via planning - to determine the appropriateness of *new* small HMOs on a case by case basis (section 10 of this report outlines emerging policy approaches). Part of the benefit is that if permission is granted it can be granted with appropriate conditions to ensure that they are of an adequate standard.

5.33 The Article 4 Direction will not solve all problems – its benefits will not be immediate and its impacts are restricted to *future* small HMOs. However, it could have an important role in protecting family housing and improving HMOs as one of a suite of measures being pursued by the Council to raise housing standards in private sector.

5.34 In order to be effective, a continued approach of integrated enforcement across the Council is necessary. In particular, planning enforcement activity in the proposed Article 4 Direction Area and the overlap with the Additional licensing



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scheme in Harringay Ward and potentially in Tottenham Wards demand a coordinated approach. Development of a focussed programme of proactive small area based enforcement activity over an extended time period will be necessary. The planning and prioritisation of work as part of this cross departmental enforcement programme will be usefully informed by intelligence collated as a result of research on this Article 4 Direction and in support of the proposed Additional Licensing Scheme in Tottenham.

Action by other London Boroughs

- 5.35 A borough wide Article 4 Direction to remove permitted development rights related to small HMOs has already been implemented by Barking and Dagenham Council; this came into effect in May 2012. Newham Council is currently consulting on a borough-wide proposal and preliminary consultation on this issue was undertaken by Enfield Council over the summer. Appendix 4 provides further detail.

6. Comments of the Chief Finance Officer and financial implications

- 6.1 As part of the 2012-13 budget process, the Council agreed a budget for a Tottenham Regeneration team which included monies to tackle HMO and additional planning enforcement activities. The costs of producing and implementing the recommendations within this report has been funded by an additional one off revenue sum of £100,000 per annum for three years. This will be shared with Private Sector Housing Team who are increasing Additional Licensing for HMOs in some Tottenham wards. There is a risk that pressure on the planning budget will increase as they will be required to process planning applications for which no fee will be received, this is the impact of an Article 4 Direction, and there will be additional HMO enforcement costs. The associated costs of this will be monitored over time.

7. Head of Legal Services and legal implications

- 7.1 The Council needs to be satisfied that using Article 4 Direction powers is necessary to protect local amenity or the wellbeing of the area and must support the presumption in favour of sustainable development and that furthermore there are exceptional local circumstances which leads the Council to wish to withdraw these permitted development rights to respond to local circumstances
- 7.2 Following the making of the Article 4 Direction the results of the consultation exercise must be taken into account before deciding to confirm the Direction.
- 7.3 The making of a non-immediate direction will avoid having to pay compensation but Members must be aware that the 12 month delay may encourage property owners to make use of the permitted development rights to change to a small HMO during that period.



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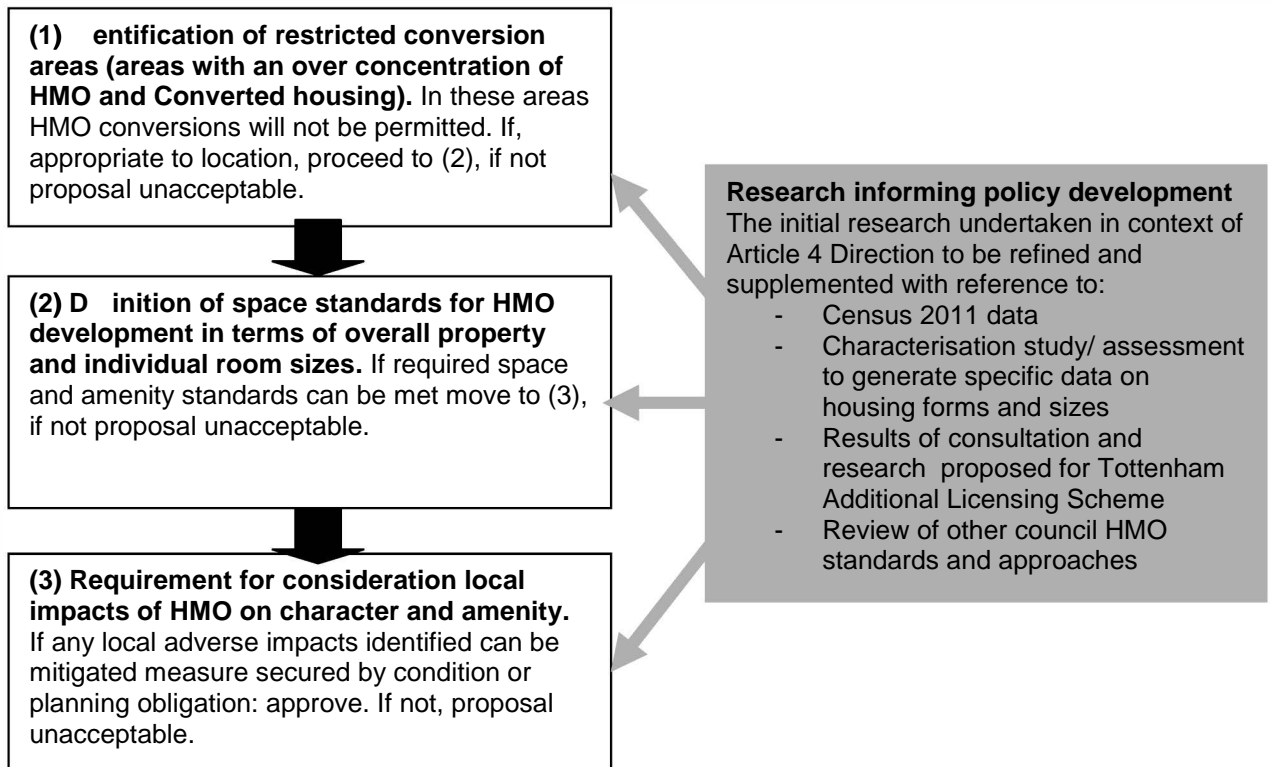
8. Equalities and Community Cohesion Comments

- 8.1 An initial Equalities Screening has been carried out. A full Equalities Impact Assessment (EqIA) is also recommended in connection with this proposal for an Article 4 Direction for small HMOs; this will be undertaken in late 2012/ early 2013. This should incorporate the results of consultation on the proposal - if approved for consultation by Cabinet - and be used to inform the final decision by Cabinet on whether to adopt the Article 4 Direction. The Equalities Screening is a background paper to this Report and is available on request.

9. Head of Procurement Comments – N/A

10. Policy Implication

- 10.1 A strong and effective policy is essential when determining planning applications for small HMOs to ensure the Council's housing needs, and the objective of creating a sustainable community are met. In the intervening period between making and confirming the Article 4 Direction, new planning policies for HMOs in Haringey will be developed as part of Haringey's forthcoming Development Management Policies Document.
- 10.2 The new policies on HMOs will apply to all large HMOs across the borough as well as small HMOs in the Article 4 Direction area. New policies will also be developed related to conversion of single family dwellings to self contained flats – although it must be noted that this already requires planning permission and is therefore not affected by the Article 4 Direction proposed. This will review and update the current UDP Policy HSG6 (as set out in Appendix 1). The shape of this emerging policy approach and sources that it will be informed by is presented below:



10.3 The approach outlined above is indicative only at this stage and will be informed by an Equalities Impact Assessment and Sustainability Appraisal and will be the subject of consultation later in 2012. The Development Management Policies Document will also be the subject of an Independent Examination in Public prior to adoption which is anticipated to be in 2013. It is intended that these updated planning policies be in place on or shortly after the Article 4 Direction comes into effect.

11. Use of Appendices

- 11.1 **Appendix 1:** Haringey Unitary Development Plan (2006) Policy HSG 6 Houses in Multiple Occupation
- 11.2 **Appendix 2:** Haringey HMO and Planning Policy Development Research Paper, August, 2012.
- 11.3 **Appendix 3:** Replacement Appendix D to Circular 9/95: General Development Consolidation Order 1995 (June 2012)
- 11.4 **Appendix 4:** Other London Borough HMO Planning Approaches, August 2012



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12. Local Government (Access to Information) Act 1985

1. Draft Initial Equalities Impact for HMO Article 4 Direction Proposal, August 2012
2. Cabinet Report on Proposed Changes to the Regulation and Licensing of Houses in Multiple Occupation (HMOs), including the Introduction of an Area Based Additional Licensing Scheme, 7 July 2011
3. Evidence Gathering – Housing in Multiple Occupation and possible planning responses (DCLG 2008)