

[REDACTED]

From: [REDACTED]
Sent: 08 January 2019 14:02
To: DPD (Planning Service Area)
Subject: Article 4 - HMOs

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam

I'd like to make my objections heard about Redbridge council not falling into line with other councils re HMO's. I understand that Redbridge has not implemented Article 4 Direction and hence no planning permission is required to turn smaller dwellings into 6 person HMOs. The borough is already over developed and resources and infrastructure are being stretched beyond what is reasonable.

PLEASE NOTE MY OBJECTION.

Yours

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 07 January 2019 18:45
To: DPD (Planning Service Area)
Subject: Article 4 (1) Direction for London Borough of Redbridge

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ewan

We are writing to you with regard to the consultation document regarding the Article 4 (1) Direction implementation proposal.

Both my wife and I strongly support the implementation of Article 4 (1) Direction.

We have read " London Borough of Redbridge Planning Policy H M O Research Paper, December 2018 " and it is very evident that HMOs have been a blight on the borough.

The fact that the Council do not know how many HMOs there are currently in the borough does not bode well - Quote from the research paper "the mapping shows only a fraction of the estimated number of HMOs in the borough".

The document highlights how detrimental HMOs have been to local communities and documents how incidents of crime, anti social behaviour, litter etc have increased in the areas where HMOs have opened.

We live opposite a very large building (The Old Rectory plus two adjoining flats on Buckingham Rd E18 2NH). This building would make four, large, family sized homes , which the council is in desperate need of. However the owner is in the process of converting the entire development into small HMOs.

This will have a devastating effect on the local community and yet the owner has no interest in this fact, and is trying to obtain licenses to use them as HMOs so that he can maximise / squeeze as much money as possible out of his asset. He has no concerns regarding the effect 24 additional people, on an already congested road, will have on the community.

We therefore strongly support the Council regarding their proposal of introducing Article 4 (1) Direction.

In fact, we believe the Council has a moral duty to suspend further developments of HMOs until they have " got their house in order " re managing and controlling where HMOs can be built and in addition the council should carry out a feasibility study as to what effect an HMO will have on the local community.

The fact that Redbridge are giving unscrupulous property developers / landlords another year to ruin the lives of local communities strikes us as not only being negligent but appears to be Redbridge favouring the developer over local residents who pay rates in the expectation that the Council will look after their welfare.

We quite understand and support the fact that people require places to live. However they deserve quality housing and somewhere to call home. To provide them with a room in a HMO with a group of other strangers does not meet their needs. HMOs are "holding places " not homes.

To allow HMOs to be developed unhindered for another year strikes us as being negligent as the research document has already forewarned us as to what to expect. We therefore urge Redbridge Council to liaise with the Secretary of State highlighting the need for Article 4 (1) Direction to be implemented immediately and not on 6th December 2019.

Yours sincerely

A solid black rectangular redaction box covering the signature area.

Sent from my iPad

[REDACTED]

From: Prab Paul [REDACTED]
Sent: 21 January 2019 18:00
To: DPD (Planning Service Area)
Cc: [REDACTED]
Subject: Article 4 consultation period

Follow Up Flag: Follow up
Flag Status: Flagged

Hi

As a local landlord I wanted to express my concern about withdrawing permitted development rights for small houses in multiple occupation (HMOs) in the C4 use class.

I think there is an overwhelming need for such houses and introducing the requirement to seek planning permission will seriously hinder the availability of much needed Tom's.

Please can my email be acknowledged as received.

[REDACTED]

From: [REDACTED]
Sent: 19 January 2019 12:09
To: DPD (Planning Service Area)
Subject: Article 4 Direction

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

I am writing with regard to the fact that Redbridge is one of the last remaining boroughs of London to implement Article 4 Direction.

The fact that any developer can turn any dwelling into a small HMO without planning permission will severely strain the area of South Woodford's infrastructure.

Already our roads are packed with parked commuters cars using South Woodford station for example.

Therefore I ask you strongly to implement Article 4 like the majority of other boroughs to stop Redbridge becoming one of those places that 'used to be a nice place to live'.

Many thanks,

[REDACTED]

[Redacted]

From: [Redacted]
Sent: 16 January 2019 18:09
To: DPD (Planning Service Area)
Subject: Article 4 Direction C4 HMOs

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,
Can I ask why it will take 12 months after consultation to implement the changes to Article 4 Direction?
Will it not be a case of application after application being pushed through prior to the change date?
I understand that our borough is one of the last to implement the changes, is this correct and why hasn't the change been implemented?
Can you confirm how many applications you have received since the Government recommended the change?
Which wards in Redbridge have received the most applications?
Also, how many owners who live outside of Redbridge are trying to force HMO status on to actual residents?
You need to do the right thing by your residents and act quickly to implement the change, not wait until December 2019, that is unless you have the money to build schools, Doctors etc, so that the infrastructure can cater for increased occupancy.
Kind regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Disclaimer

This e-mail and any attached files are intended for the named addressee only. It contains information, which may be confidential and legally privileged and also protected by copyright. Unless you are the named addressee (or authorised to receive for the addressee) you may not copy or use it, or disclose it to anyone else. If you received it in error please notify the sender immediately and then delete it from your system.

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 08 January 2019 22:04
To: DPD (Planning Service Area)
Subject: Article 4 Direction C4 HMOs

Follow Up Flag: Follow up
Flag Status: Completed

Here are my comments regarding the non-immediate, Borough wide Article 4(1) Direction that the Council is proposing. I am a Newbury ward resident who is becoming more and more frustrated by the unsociable behaviour of some of the residents living in a number of unregistered HMOs in my street. I am therefore all in favour of the Council taking borough wide action, but am peeved that it will not take effect until December (if agreed). That is giving people almost another year to convert even more houses without needing to obtain permission. Why can't the Direction be effective immediately it is agreed?

The road I live in has an alleyway at the back of our houses and it is always having rubbish dumped in it by neighbours. Today a number of fridges, freezers and broken fence panels were dumped under my private parking port. The access alleyway has had a car blocking it for a few days, so the dumper must have used their back garden gate for access. A normal house doesn't need more than one fridge freezer, so I assume they are from an HMO. A large old hob is leaning against the wall of one of my neighbour's houses, with an empty "new hob" box on the pavement outside and I presume they are having a new kitchen fitted! Some of the houses seem to have three or four cars, all parked in the street because they use their rear garages for other things. Will the directive resolve this type of things?

So, assuming the Council agree, the direction will take effect in December. But what happens about all the HMOs that have already been converted without permission - That is the problem that really needs addressing!

[REDACTED]

From: [REDACTED]
Sent: 12 January 2019 20:52
To: DPD (Planning Service Area)
Subject: Article 4 Direction for HMOs

There are not the resources nor infrastructure to support more residents in this area. The parking alone in my area is already horrendous. The more HMOs there are the more people will be attracted to the area causing chaos with more people being accommodated in already densely populated streets.

I believe that most London Boroughs have already implemented planning permissions for all HMOs including even smaller ones.

Why wasn't permission required in Redbridge? More developers will therefore be concentrating on the boroughs where permission is not required yet. It seems to me that permissions should be implemented now as a matter of urgency and not delayed until 6th December 2019.

[REDACTED]

Sent from Samsung tablet.

[Redacted]

From: [Redacted]
Sent: 07 December 2018 08:45
To: DPD (Planning Service Area)
Subject: Article 4 Direction for the area of LBR HMOs

Follow Up Flag: Follow up
Flag Status: Completed

I am totally opposed to your changing dwelling houses to multi occupation houses.

[Redacted]

[Redacted]

Please note that this message may contain confidential information. If you have received this message by mistake, please inform the sender of the mistake by sending a reply, then delete the message from your system without making, distributing or retaining any copies of it. Although we believe that the message and any attachments are free from viruses and other errors that might affect the computer or IT system where it is received and read, the recipient opens the message at his or her own risk. We assume no responsibility for any loss or damage arising from the receipt or use of this message. Please note that any advice or guidance provided relates only to our own products and is therefore not independent.

[REDACTED]

From: [REDACTED]
Sent: 11 December 2018 08:59
To: DPD (Planning Service Area)
Subject: Article 4 Direction for small HMOs

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

I would like to vote in favour of an Article 4 Direction. Please let me know if there is another process I need to go through to cast my vote.

I have read the research on this and also see evidence of the damage unlicensed and unregulated HMOs can do to the local community. I believe that a proper consultation on each new HMO would be helpful.

I also think more action should be taken to make sure that landlords who ignore the rules face the intended consequences.

Kind Regards,

[REDACTED]

Sent from my iPhone

[Redacted]

From: [Redacted]
Sent: 09 January 2019 11:42
To: DPD (Planning Service Area); Mohammed Khalil
Subject: Article 4 Direction for the area of London Borough of Redbridge

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir

We have 4 HMO properties that were converted between 2015 -2017. The properties were gutted out and conformed to building regs for which we have all certification.

We also have licenses for them.

Are we suppose to do anything about them as I am not clear at the moment and seek your advise as to what course of action we must take.

The properties in question are:

[Redacted]
[Redacted]
[Redacted]

Regards

[Redacted]
[Redacted]
[Redacted]

[Redacted]

From: [Redacted]
Sent: 20 January 2019 15:54
To: DPD (Planning Service Area)
Subject: Article 4 Direction HOMs

Follow Up Flag: Follow up
Flag Status: Flagged

I am writing to express concern about the current permitted development of HMOs in the local area, without the need for planning permission. I urge you to fall into line with the vast majority of boroughs and require planning permission on all HMOs (including small HMOs) with immediate effect. Over-development of existing residential dwellings is putting undue pressure on local infrastructure and resources which is a threat to the existing community.

Thank you
[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 19 December 2018 12:19
To: DPD (Planning Service Area)
Subject: Article 4 Direction in Redbridge

Dear sirs,

As the Ward Coordinator for Churchfields NHW and a resident directly affected by the impending exploitation of this planning loophole by virtue of the fact that a large family home in our street is in the process of being split into 4 separate flats which were declared in the planning applications to be three 2 bedroom and one 3 bedroom dwellings we now find that it is intended to be a series of 'small hmo's' thus potentially housing 24 people in a property originally intended for two families.

We are losing family homes in this area and the indiscriminate basis upon which small HMO's can be created without any planning consent and therefore without due consideration being given to the actual impact that this sort of housing bring to an area is completely untenable.

It is my submission that an IMMEDIATE moratorium should be imposed making ALL HMO's, regardless of size, subject to obtaining appropriate planning permission. Furthermore I submit that notification of these applications must be given to at least the surrounding 12 properties, being three deep on each side of the proposed development including across the street.

The impact of HMO's on all issues of crime, anti-social behaviour and infrastructure strain is well documented and to allow this situation to continue for another 12 months is ludicrous.

Article 4 Directions should be in place for Redbridge with immediate effect, and the granting of planning consent for these developments should be limited to areas which are not primarily family residential. In particular the Churchfields area should be deemed an area where NO HMO's of any size will be permitted in order to preserve the family residential nature of this area.

I look forward to hearing from you in this regard.

Regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 04 January 2019 16:54
To: DPD (Planning Service Area)
Subject: Article 4 Direction re HMO's

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Policy Team,

I am writing to express my concern that the Article 4 Direction re Homes of Multiple Occupation has not been implemented in Redbridge and urge you to implement the Direction as soon as possible.

Experience has shown that HMO 's have a negative impact on an area. It is common for residents living in HMO's to have little regard for maintaining a clean and tidy immediate environment, the increased number of people often creates additional noise and parking difficulties. Frequently people living in HMO's are transient and have no interest in investing in the wider community.

Furthermore the increase in numbers of people living in an area places an additional strain on already overstretched resources and infrastructure such as health, education, social care and transport services.

I hope that you will take these comments into account and implement the Article 4 Direction.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

From: Keith Taylor [REDACTED]
Sent: 04 January 2019 21:36
To: DPD (Planning Service Area)
Subject: Article 4 Direction

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir or Madam,

It has brought to my attention about the Council and the adoption of Article 4 (1) Direction. I am astounded that Redbridge considers it fit to allow the unchecked implementation of (small) HMO's without any permissions required. Is Redbridge a borough cash rich with the infrastructure in place to accommodate the extra population or does it see this as a way out of filling just one of the many voids the council is failing to rectify. It is an unfortunate fact that allowing HMO's unchecked will bring about many problems for residents: crime, noise, parking, rubbish, uncivil behaviour let alone further pressure put on police, schools, doctors, dentists, roads. When and only then that you have all that sorted out should you legitimately consider lifting HMO constraints.

This is a complete no brainer - the council must implement Article 4 with no delay or risk cementing a growing view that there is corruption in the council with personal gain being put before what is good for the Borough. Do the right thing.

Yours faithfully

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 31 January 2019 19:54
To: DPD (Planning Service Area)
Subject: Article 4 Direction

Categories: Red Category

To whom it may concern,

I am strongly opposed to the fact that Redbridge does not implement an Article 4 Direction. Redbridge appears to be at the mercy of HMO developers who simply want to make money. Why is Redbridge Council supporting this? Surely it is reckless not to have any control over these developments?

As a resident of Buckingham Road in South Woodford, I am currently being directly affected by a single residential dwelling being turned into a HMO. This puts incredible pressure on an already overloaded infrastructure.

Please consider my plea, along with those presented to you by other residents and please consider our wishes above the needs of greedy developers. I chose to live in Redbridge for the quality of life and ease of access to local amenities. I love living here, but the pressure on local services is becoming unbearable.

Yours sincerely,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 24 January 2019 14:53
To: DPD (Planning Service Area)
Subject: article 4 HMO Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,
I am writing in support of the proposed introduction. There is a wealth of evidence from numerous specific examples of poor practice, something which many other London Boroughs have wisely already reacted to. I fail to see why Redbridge should have poorer safeguards.

Regards,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 29 January 2019 19:39
To: DPD (Planning Service Area)
Subject: Article 4 objection

To whom it may concern,

As the owners of [REDACTED] E18 [REDACTED] we would like to register our objective to have Redbridge fall into line with immediate effect the need to have planning permission and consent for any dwelling to be used as a HMO.

This should apply to all forms of HMO's to ensure this already over populated borough and road do not get further occupied and have an even greater drainage on already stretched public services.

These types of occupancies should be given the same focus, approval levels and attention as any other decision of such magnitude that will affect the area and community.

The fact this is standard in most other boroughs proves it is a required piece of legislation and one that needs rectifying immediately to ensure this possible loophole doesn't have an adverse impact and is exploited for pure financial gain to the detriment of home owning residents.

Please acknowledge receipt of this email and advise of any further action we can take to ensure this is brought in with immediate effect.

Kind regards

[REDACTED]

[Redacted]

From: [Redacted]
Sent: 03 January 2019 15:57
To: DPD (Planning Service Area)
Subject: Article 4(1) Direction

Follow Up Flag: Follow up
Flag Status: Flagged

Attn : Planning Policy Team

As a resident living within the demarcated area , I completely support the suggested change that HMO`s should not be constructed in LBR without a planning application under part III of the Town and Country Planning Act 1990 (as amended) . I understand that this will bring LBR into line with most other London Boroughs.

Your sincerely

[Redacted]

[Redacted]

This message and any attachments are confidential.
If you have received this message in error please delete it from your system.
If you require any assistance please notify the sender. Thank you.

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 04 January 2019 15:14
To: Ewan Coke
Cc: [REDACTED]
Subject: Article 4

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ewan

I understand Redbridge council are now discussing the introduction of Article 4, which ensures all HMOs require planning permission. I live at [REDACTED] [REDACTED] Nos 49,49a and 49b. Our neighbour who lived there for 22 years, decided, at the beginning of the year to turn what were two flats into an HMO for 12 people and the family home into another place for 12 people.

This was done by subterfuge, which I will not bore you with, and has caused total disruption and mayhem in our road much to the dismay of elder residence (of which I am one) and parents walking their children to school etc.

We understand Redbridge went for an article 4 some years ago and it was stopped by someone at Westminster, I would like to know why it did not go through then and cannot say how urgent it is that it goes through now before another community has to go through the absolute hell that we are going through. The future is a worry when two years ago a planning application for extra floors on flats in Buckingham Road was turned down because of the parking, too many people etc.

I can only hope the article 4 goes through as a priority to keep the character of South Woodford and the community that we value.

Thank you.

Best wishes

[REDACTED]

[Redacted]

From: [Redacted]
Sent: 07 January 2019 18:56
To: DPD (Planning Service Area)
Subject: Borough-wide, non-immediate Article 4(1) Direction for London Borough of Redbridge

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam, I would like to comment on the above consultation taking place on HMO licensing and whether to remove the "permitted development" rights for small HMOs.

Living opposite a HMO in [Redacted] IG6 [Redacted], I find it quite absurd that planning permission is not required in order to create a HMO of up to 7 people. I have seen from experience, that many of the residents do not stay long and there is a never-ending string of new tenants. At least 4/5 of the tenants have a car and considering there is only parking for 2 cars, there is extra demand on local parking. They also do not have pride in the property, it's just a temporary base and they are not planning on staying long. The houses in Trelawney Road are 1930's 3 bedroom houses. The property owners feel by adding as large an extension as they can get away with, converting the loft space, and even renting out the small box room which can only accommodate a single bed, they then have rental accommodation for 6 individuals. Residents should be notified in the same way as if you wanted to build an extension of a certain size, about a property owner wanting to create a HMO next door to you. I had to gain planning permission to build a detached garage which took some time, why can a property owner basically create a mini block of flats without requiring any planning permission.

Yours faithfully
[Redacted]

[CC]Personal[/CC]

This message and any attachment are confidential and may be privileged or otherwise protected from disclosure. If you are not the intended recipient, please notify the sender immediately and delete this message and any attachment from your system. Do not copy them or disclose the contents to any other person.

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 22 January 2019 14:40
To: DPD (Planning Service Area)
Subject: Borough-wide, non-immediate Article 4(1) Direction for London Borough of Redbridge

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam,

As a resident of Redbridge, and having read the Council's publication 'London Borough of Redbridge Planning Policy HMO Research Paper' (December 2018), I wish to register my support for the implementation of a borough-wide Article 4 Direction to remove permitted development rights for the conversion of family dwellings into small houses of multiple occupation (HMOs) (Use Class C4).

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 24 December 2018 15:50
To: Ewan Coke; DPD (Planning Service Area)
Subject: Borough-wide Article 4(1) Direction for HMOs

I am writing to register my strong support for the implementation of a borough-wide, non-immediate Article 4 (1) Direction for Houses in Multiple Occupation (HMO), on which comments are sought up until Thursday, 31 January 2019.

My understanding is that the Article 4(1) Direction, if confirmed by the Secretary of State, would have the effect of giving the Council the ability (through requiring submission of a planning application) to control the operation of small HMOs under the C4 use class that have 6 or less occupants. HMOs tend to be considered properties occupied by unrelated individuals who share basic amenities such as a kitchen or bathroom. Under the General Permitted Development Order (2015) a single family dwelling house (C3) can convert to a small HMO without needing to apply for planning consent. The need to introduce the Direction results from changes made in 2010 by the Coalition Government which had the effect of extending permitted development rights so that planning permission is not required to change a dwelling house (C3) to an HMO (C4) accommodating up to six people. With respect to large HMOs – those accommodating more than 6 people - these are classed as Sui Generis and therefore already require planning consent. The Council should therefore already have enforcement powers to take any necessary action where there is evidence to demonstrate that there are more than 6 people and that a material change of use has occurred.

Over the 25 years that I have lived in Redbridge there has been a steady erosion in the number of detached, semi-detached and terraced housing through conversion to flats or in some cases conversion to HMO. In summary, I consider that the cumulative impact of HMOs to have a negative impact sufficient to justify the Council using powers under Article 4 of the General permitted Development Order (GDO) to remove the permitted development rights which currently enable a change of use from C3 (dwelling house) to C4 (HMOs).

HMOs tend to concentrate in areas and their concentration can be associated with the following issues:

- poor standards of accommodation •
- loss of local character •
- reduction in environmental quality •
- increased noise complaints •
- increased anti-social behaviour •
- loss of single family dwelling houses •
- increased levels of crime •
- increased pressures on car parking •
- dominance of private renting •
- increased pressure upon local services •
- changes to local retail provision

Therefore, in order to seek to have some control over potential negative impacts that may arise, it is important that the Council is able to control the spread of HMOs through the planning system. With over 17,000 new households estimated to need accommodating in Redbridge over the next c10 years, the planning system has an important role to play in managing this pressure whilst protecting and enhancing the qualities that make Redbridge such a distinctive place where people want to live. Whilst intended for use in exceptional circumstances, it is important to remember that Article 4 Directions do not stop development; they mean that planning permission is required. I have little doubt that in making the case to justify confirming this Article 4 Directions the Council will be able to provide compelling evidence to demonstrate that the spread of HMOs harms local amenity and / or the proper planning of the area.

I note that, if confirmed, the Direction withdrawing permitted development rights for this class of development, would not come into effect until 6th December 2019. I appreciate that to avoid the possibility of successful compensation claims, it is prudent for the Council to advance this Article 4(1) Direction as a non-immediate one, and in so doing it is necessary to allow a whole year to elapse from the date of making the direction. However, I am concerned that considerable further damage is likely to be done across the Borough as a result of this delay during which it will be possible to make such changes without the need to obtain planning permission.

The causes and potential effects of HMOs are very well explained in policy LP6 and supporting reason justification text of the Council's recently adopted development plan. Picking up on what is said in this local plan policy, in supporting the Article 4(1) Direction I would comment as follows:

1) The high demand for homes has seen an increase in HMOs across the Borough. Housing tenure patterns in the borough have changed over the last 10 years with a significant growth in the private rented sector and a reduction in home ownership. Considerable damage has already resulted in the subdivision of former substantial family houses into bedsits. It is therefore very important to protect the existing housing stock, particularly larger homes in the borough and ensure they provide a range of homes in terms of size. The traditional source of HMOs tends to be larger, older single family dwelling houses. I would estimate that well over half of Redbridge's housing stock was built before 1945 with, notwithstanding the proliferation of flats in the last 20 years, much of the housing stock still comprising houses, either suburban, suburban terrace or urban terrace.

2) In terms of meeting national space standards, it is important that new housing units provide satisfactory living conditions for both the benefit of occupiers and neighbours. the Council should have the power to ensure that gross floor area of the property exceeds 130 sq.m where two units are proposed and exceeds 180 sq.m where three or more units are proposed.

3) The Council needs to have the ability to ensure that significant loss of character or amenity to a neighbourhood does not arise as a result of increased traffic, noise and/or general disturbance.

4) The Council needs the ability to ensure that appropriate car and cycle parking provision are provided in accordance with London Plan standards. A concentration of such forms of housing can have a detrimental effect on the character and amenity of an area where a high number of dwelling conversions and HMOs often causes a cumulative impact of added pressure on off street car parking and local services e.g. waste disposal and collection.

5) The continual erosion of the borough's existing larger housing stock poses serious issues for maintaining a mixed housing offer in many predominantly residential neighbourhoods, and ensuring the adequate provision of larger family units. The Council needs to ensure that an appropriate mix of housing is achieved, this needs to be balanced against the need for larger homes. Furthermore, the loss of existing family size housing is often difficult to offset through the provision of family size housing in new development as this new higher density developments will predominantly be located in town centres and / or areas in close proximity to a high level of public transport accessibility. By their nature, dwelling conversions and buildings in multiple residential occupation are more intensely used. Given this, it is best to locate them in areas with good public transport accessibility which are in close proximity to local shops and services. Areas outside of these centres are more appropriate to family living and the provision of larger homes. Confirmation of the Article 4 will be important power in assisting the Council to increase the provision of larger homes in new build housing schemes whilst continuing to resist the loss of existing larger homes should ensure the housing stock remains balanced and provides housing choice in the Borough.

██████████

████████████████████

██

[REDACTED]

From: [REDACTED]
Sent: 04 January 2019 17:27
To: DPD (Planning Service Area)
Subject: For The Planning Policy Team

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam,

I am writing to state that I support the suggested change that HMO's should not be built in the Borough of Redbridge without a planning application under part 111 of the Town and Country Planning Act 1990 (as amended). I am aware that most other London Boroughs have already done this and as I live in the Borough of Redbridge I am appalled that Redbridge is lagging behind.

Yours faithfully,

[REDACTED]



Virus-free. www.avast.com

[Redacted]

From: [Redacted]
Sent: 16 January 2019 20:17
To: DPD (Planning Service Area)
Cc: [Redacted]
Subject: HMO - Buckingham Road

Follow Up Flag: Follow up
Flag Status: Completed

I have lived in South Woodford all my life, initially on Buckingham Road where my Mother still resides and now in Carnarvon Road. We've seen an increase in crime across the area, traffic is almost always at a standstill on the High Road, schools and doctors facilities are overrun and still the new housing developments continue. There are currently three on Buckingham Road alone – including the HMO.

HMO's on Buckingham Road (or anywhere else) are completely inappropriate. They will increase the issues residents already deal with on a daily basis and only benefit the landlord's bank account at the expense of everyone who lives around them.

I urge you to put a stop to this and invoke Article 4 (1) as a priority.

Your Sincerely,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 05 January 2019 12:27
To: DPD (Planning Service Area)
Subject: HMO Buckingham Road

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Planning Team, re Article 4 Direction

As a resident of Buckingham Road I am extremely concerned regarding the change of use for number 49, 49a and 49b . Initially planning permission was given to convert two properties into 3 or 4 dwellings, Once permission had been obtained Mr Bhanot immediately changed the conversion into a houses of multi-occupancy of 24 single (double if the rooms are large enough) bedsits which I gather is legal in terms of planning which shows the present weakness in the planning laws. Legal as it may be in all respects this is out of all proportion in a residential street of mainly semi-detached houses. It is well documented that HMOs create many problems in the community as they house transient residents who have no regard for the neighbour hood with issues of crime and antisocial behaviour. Recently a property is up for sale at the other end and advertised as being suitable for development. perhaps another HMO? Local infrastructure cannot support this density of population, It seems that by refusing to interfere in a development by a greedy landlord exploiting a weak and ineffective planning policy this kind of scheme is allowed to ruin a quiet residential street. The extraordinary length of time to alter present planning on HMOs for bringing Redbridge in line with other boroughs is another example of a council that is frightened of upsetting a few influential members of the public who know how to manipulate the system. It is for examples like this, which certainly are being repeated over the Borough, that Article 4 Direction should be implemented IMMEDIATELY .

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 24 January 2019 20:17
To: DPD (Planning Service Area)
Subject: HMO Developments in our borough

Follow Up Flag: Follow up
Flag Status: Flagged

I'm writing to express my concern about why the Article 4 (1) Direction has not been implemented in Redbridge.

We don't believe that this type of development should be allowed within normal residential areas unless it is very carefully reviewed because of the additional pressures on local facilities, parking, change in change of character of the area and impact on the environment.

We wholeheartedly express my concerns and would like my views expressed during the consultation.

Best regards

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 08 January 2019 15:49
To: DPD (Planning Service Area)
Subject: HMO in Buckingham Rd

Follow Up Flag: Follow up
Flag Status: Flagged

Since I moved to South Woodford in the early 80's, it was a very pleasant place to live. But over the last 10 years or so, it has become unbearably congested. Too many buildings are being erected. The traffic is at a standstill. The schools are over subscribed and getting a doctors appointment could take 4 weeks. Simply put, this area is over crowded and is slowly being destroyed. Now we have the nightmare of HMO's with unscrupulous home owners turning their homes into bedsits whilst the home owners themselves are moving out to more pleasant gated communities. Leaving us in Buckingham Road and surrounding areas with all the problems that will arise from this type of dwelling. I urge you to put a stop to this and invoke article 4(1) as a priority.

Regards
[REDACTED]

[Sent from Yahoo Mail for iPad](#)

[REDACTED]

From: [REDACTED]
Sent: 09 January 2019 13:50
To: DPD (Planning Service Area)
Subject: HMO Redbridge Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Hello,

We moved to Redbridge to come and live in a community, and have settled in the neighbourhood. We now discover that is possible, and the only London borough to do this, to build multiple homes on one plot.

Not only does this impact the neighbours and parking, but it is already difficult to get on the central line at ANY time of the morning as it is, without adding several families per plot of land.

Please address the concerns of the community and make this change sooner rather than later.

Many thanks,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 05 January 2019 11:23
To: DPD (Planning Service Area)
Subject: HMO

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam

I am very much against allowing houses of multiple occupancy within Monkams. This will be extremely detrimental to this residential area. There is not the infrastructure to support perhaps an influx of younger families. Parking is already a hazard and problematical in this area.

I also wonder what sort of regulations apply re houses taking in lodgers? Eg number [REDACTED]. Sometimes there are extra cars parked as a result of this.

Yours faithfully

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 11 January 2019 07:24
To: DPD (Planning Service Area)
Subject: HMOs Consultation

Follow Up Flag: Follow up
Flag Status: Completed

To Whom it May Concern,

I believe that Redbridge should require planning permission on ALL (including small) HMOs irrespective of size immediately and not wait until the proposed date of 6th December 2019.

May I respectfully ask for a reason why this article has not been adopted previously as most other London boroughs have?

I am very concerned about the over-development of our borough and the impact that this has on the already over-stretched resources that are the result of this over-development.

I look forward to your response.

Yours faithfully,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 05 January 2019 19:47
To: DPD (Planning Service Area)
Subject: HMO's in Prospect Road

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Redbridge Council,

It is encouraging to see the implementation of Article 4 which requires landlords to obtain planning permission before converting properties to HMO's.

I note that the article says landlords MAY face prosecution if they don't apply for planning permission. They have a YEAR to set up MORE HMO's before the article is enforced!
Who will ENFORCE Article 4 even if the council do get round to implementing it?

Seems to be a bias towards the comfort and well being of landlords.

I note that it is too late for [REDACTED], a bungalow, that I understand has been converted into a 6 bedroom HMO.

As you know, car parking is at a premium in Prospect Road and I expect this HMO will make the situation even worse.

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 11 December 2018 19:53
To: DPD (Planning Service Area)
Subject: London Borough of Redbridge Borough-wide Article 4 Direction for House of Multiple Occupation

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs,

On behalf of the Support Oakfield Society, I am responding to the invitation sent to us on the 6th December to make representations regarding the Article 4 Direction for Houses in Multiple Occupation.

Our view is that it is not in the public interest that at present someone can convert a dwelling house into an House in Multiple Occupation (HMO) as a 'permitted development', i.e. without the need to submit a planning application.

We support the intention to revoke this. The Article 4 Direction is a good initiative.

HMOs by definition are owned by private landlords rather than owner-occupiers. HMOs fuel house prices in Redbridge and restrict the supply of suitable housing for families.

We believe that it is clearly sensible to require a planning application to be submitted and approved in order to permit the change of use.

We assume that permitted development presumably will continue to allow loft extensions and ground floor rear extensions.

Would you kindly acknowledge this email and include it in the supporting comments in the consultation.

Yours sincerely,

[REDACTED]
Support Oakfield Society

The Support Oakfield Society comprises over 5,700 members interested in the promotion and protection, preservation and enhancement of local amenities that further the social wellbeing, cohesion and interests of the diverse community of Redbridge.

[REDACTED]

From: [REDACTED]
Sent: 07 January 2019 20:30
To: DPD (Planning Service Area)
Subject: New regulations for small.HMOS

Follow Up Flag: Follow up
Flag Status: Completed

I fully support this plan.

I live in a road in Goodmayes where a number of houses are being used as such . People and cars are.always coming and going. None of the residents of these houses stay very long so there is no.chance of.them. integrating into the neighbourhood. We have no idea of who they are . It.causes additional strain on the car.parking situation in the road and extra rubbish. We do not know who contact when there are problems as we don't know who.owns the properties or who in managing them . If they were licenced via the council then complaints could made.

Regards

[REDACTED]

Sent from my Samsung Galaxy S5 - powered by Three

[REDACTED]

From: [REDACTED]
Sent: 15 January 2019 17:40
To: DPD (Planning Service Area)
Cc: [REDACTED]
Subject: Planning Regulations on Houses of Multiple Occupation

Dear Planning Policy Team,

We need to express our view that, like most other London boroughs, Redbridge should require planning permission to be sought by potential developers of ALL HMOs, with immediate effect, including those classified as small. At the moment many residents view Redbridge Council as a "loose cannon" among London boroughs with the potential to encourage "fat cat" developers to inflict lasting damage on the environment and dwindling resources of our borough. As we write, we bear in mind the disastrous proposals currently in place for property in Buckingham Road, South Woodford. We urge the Council to implement the wishes and well being of those they are charged to represent rather than the few whose only aspiration is the promotion of personal wealth. By doing so the Council would reassure residents of our borough that their welfare is being safeguarded and that the door to misuse of power, as well as the potential for corruption, is closed!

[REDACTED]

From: [REDACTED]
Sent: 21 January 2019 11:09
To: DPD (Planning Service Area)
Subject: possible HMO in Buckingham Road, E 18

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

I shall come straight to the point. What reason to delay when there has been sufficient obfuscation and behind the scenes manoeuvring already re. the proposed HMO in Buckingham Road, South Woodford?

Virtually all other boroughs in London have now implemented the Article4 Direction relating to HMO's. Redbridge lags behind, enabling the owners of 49, 49 A and B to proceed (to their personal advantage and to the very considerable detriment of those living in the area) without planning permission.

Surely to prove its integrity and basic honesty in matters relating to the proposed HMO in Buckingham Road Redbridge must needs fall in line and act to adopt the amendment immediately. No further overdevelopment and erosion of facilities can be allowed.

Yours faithfully,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 20 January 2019 11:58
To: DPD (Planning Service Area)
Subject: Re: Article 4 (1) Direction for London Borough of Redbridge

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sirs,

We are writing to you with regard to Article 4 (1) Direction implementation proposal.

Initially it should be clear that both myself, [REDACTED] and my wife, [REDACTED], support the implementation of Article 4 (1) Direction.

Having read the "Redbridge Planning Policy HMO Research Paper, December 2018" it is clear that Houses for Multiple Occupation (HMO) are regarded by Redbridge as highly undesirable and to be avoided, an opinion we share. It is therefore with considerable concern that we also read in the same document that the borough has no idea how many HMOs there are in the borough. This reinforcing the need for the speedy implementation of council control of such housing.

The document also demonstrates that local communities have seen an increase of crime, anti social behaviour, litter, fly tipping etc. where HMOs have been introduced. A strong argument for introducing stronger controls.

We live in Buckingham Road. [REDACTED] where The Old Rectory, a large house with two attached flats, sees the owner busy converting the whole property into four small HMOs. A total of twenty four double bedsits, this in a street already over congested by traffic, overcrowded with parking and in an area in need of family housing, not HMOs . We do understand that people require homes in which to live. However, what is required are family homes, not rooms in HMOs where people live alongside and sharing facilities with numerous other strangers.

We have an additional concern in that the council currently intend to make no decision regarding Article 4 (1) Direction until December 2019. This leaves an open door for twelve months in which the borough could be blighted by those intent on profit rather than community.

For all the above reasons we strongly support the council in implementing Article 4 (1) immediately rather than in December 2019.

Yours,

[REDACTED]

Sent from [Mail](#) for Windows 10

[REDACTED]

From: [REDACTED]
Sent: 14 December 2018 12:40
To: Ewan Coke
Subject: RE: Article 4 Direction for the area of London Borough of Redbridge
Attachments: Ack letter - Redbridge administrative area_.docx

Dear Mr Coke

My apologies again, if you have received my earlier email please dis-regard it and refer to the correspondence attached.

Kind regards



**Ministry of Housing,
Communities &
Local Government**

[REDACTED]
Planning Casework Officer – Team C
Planning Casework Unit
5 St Philips Place, Colmore Row, Birmingham B3 2PW.

Please note my working days are Wednesday – Friday, should you require assistance while I am out of the office please contact PCU, details provided below.

PCU General Enquiries: pcu@communities.gov.uk **Telephone:** 0303 44 48050
Visit us on GOV.UK: <https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government> **Twitter -** <https://twitter.com/mhclg>

From: [REDACTED]
Sent: 14 December 2018 12:20
To: 'Ewan Coke' [REDACTED]
Subject: RE: Article 4 Direction for the area of London Borough of Redbridge

Dear Mr Coke

Apologies for the delay in responding to you, the department underwent an IT upgrade last week which has led to us experiencing some delays in processing casework.

Thank you for sending through notification of making the Article 4 Direction. Please refer to the correspondence attached.

Should you have any queries please contact me.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 10 January 2019 12:36
To: DPD (Planning Service Area)
Subject: RE: HOMs

Dear Redbridge.

I'm live in Redbridge and I would like to express my concern about why the Article 4 has not been adopted yet in our borough.

Kind regards,

[REDACTED]

[Redacted]

From: Mesha Kullar
Sent: 28 February 2019 14:04
To: [Redacted]
Cc: DPD (Planning Service Area)
Subject: RE: Landlord Forum Follow Up - Article 4 Direction consultation process

[Redacted]

Thank you for your e-mail. I have copied in the planning department so they can include your feedback in their consultation report.

With best wishes

Mesha

From: [Redacted]
Sent: 26 February 2019 08:39
To: Mesha Kullar [Redacted]
Subject: Re: Landlord Forum Follow Up - Article 4 Direction consultation process

Thanks Mesha,

As a small landlord I found the evening very informative and thanks to Redbridge for organising a great event.

Its such a shame that landlords are loosing the flexibility of letting as they wish, either to families or individuals who want to share. Generally speaking working individuals and families can only afford to rent a shared house to sustain high outgoings. Large families that tend to be on benefits or council introduced can be a burden on the state and landlords as they invariably wreck the property. People show more respect and appreciation when they have earned a living rather than given it. No disrespect to genuine customers.....

Regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 22 February 2019 12:52
To: DPD (Planning Service Area)
Subject: Re article 4

Dear sir/madam

As it transpired & noted in the landlord forum meeting on 20/2/19 that the consultation process by the council regarding Article 4 direction did not reach the landlords present in the meeting , I would like the cabinet to note my concerns as follows.

1. There is already too much pressure on landlords to carry on with their rental business due to ever increasing regulations.
2. It is unnecessary to put more pressure on the landlords by way of further Intervention by the council.
3. Many landlords like me are already the victims of unnecessary/ unjustified checks by the council's housing standards officers due to the favours they return to the rich developers.
4. I feel that unnecessary financial burden (many landlords struggling to run business) will be placed on the landlords by way of fees will drive them away from the business.
5. This will effect the housing stock as landlords would not be investing due to heavy costs involved . I fact they should be encouraged to invest to improve their property standards as required .
6. Council should be concentrating on wisely spending the money realising that time is hard and is becoming hard for the public rather than raising the money.

So I strongly urge the cabinet members to withdraw the article 4.

Regards

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 06 December 2018 16:14
To: Ewan Coke
Subject: RE: London Borough of Redbridge Borough-wide Article 4 Direction

Dear Ewan
what prompted you to send me this please?

[REDACTED]

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Ewan Coke [REDACTED]
Date: 06/12/2018 12:13 (GMT+00:00)
To:
Subject: RE: London Borough of Redbridge Borough-wide Article 4 Direction

Dear Consultee,

RE: Article 4 Direction for the area of London Borough of Redbridge

Please find attached details of a borough-wide, non-immediate Article 4 Direction for Houses in Multiple Occupation, for which an eight-week period of consultation begins today, Thursday, 6 December 2018, and will continue until Thursday, 31 January 2019. You will find attached the following PDF docs:

- Letter of Notification
- Notice of Making and Article 4 Direction
- Copy of Article 4 Direction

The letter of notification contains details of the Article 4 Direction consultation period and how to submit your comments on the implementation of the Direction to the Council. You are advised to read all the attached documents carefully.

If you have any questions about the contents of this email or the consultation process please do not hesitate to contact the Planning Policy Team at dpd@redbridge.gov.uk.

Yours sincerely,

Ewan Coke

Senior Planning Officer

Property, Planning and Regeneration

Chief Executive's Department

London Borough of Redbridge

11th floor Lynton House,

255-259 High Road

Iford, Essex IG1 1NN

LONDON BOROUGH OF REDBRIDGE DISCLAIMER

This email contains proprietary confidential information some or all of which may be legally privileged and/or subject to the provisions of privacy legislation. It is intended solely for the addressee.

If you are not the intended recipient, an addressing or transmission error has misdirected this e-mail; you must not use, disclose, copy, print or disseminate the information contained within this e-mail.

Please notify the author immediately by replying to this email. Any views expressed in this email are those of the individual sender, except where the sender specifically states these to be the views of the London Borough of Redbridge.

This email has been scanned for all viruses and all reasonable precautions have been taken to ensure that no viruses are present.

The London Borough of Redbridge cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

[REDACTED]

From: [REDACTED]
Sent: 06 December 2018 12:38
To: Ewan Coke
Subject: Re: London Borough of Redbridge Borough-wide Article 4 Direction

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Red Category

Ewan, thanks for this email. Could you kindly in plain english explain what these docs are trying to convey. Your response is greatly appreciated.

Regards

Sazid Patel
[REDACTED]

Get [Outlook for Android](#)

From: Ewan Coke
Sent: Thursday, December 6, 2018 12:13:34 PM
Subject: RE: London Borough of Redbridge Borough-wide Article 4 Direction

Dear Consultee,

RE: Article 4 Direction for the area of London Borough of Redbridge

Please find attached details of a borough-wide, non-immediate Article 4 Direction for Houses in Multiple Occupation, for which an eight-week period of consultation begins today, Thursday, 6 December 2018, and will continue until Thursday, 31 January 2019. You will find attached the following PDF docs:

- Letter of Notification
- Notice of Making and Article 4 Direction
- Copy of Article 4 Direction

The letter of notification contains details of the Article 4 Direction consultation period and how to submit your comments on the implementation of the Direction to the Council. You are advised to read all the attached documents carefully.

If you have any questions about the contents of this email or the consultation process please do not hesitate to contact the Planning Policy Team at dpd@redbridge.gov.uk.

Yours sincerely,

Ewan Coke

Senior Planning Officer

Property, Planning and Regeneration

Chief Executive's Department

London Borough of Redbridge

11th floor Lynton House,

255-259 High Road

Ilford, Essex IG1 1NN

LONDON BOROUGH OF REDBRIDGE DISCLAIMER

This email contains proprietary confidential information some or all of which may be legally privileged and/or subject to the provisions of privacy legislation. It is intended solely for the addressee.

If you are not the intended recipient, an addressing or transmission error has misdirected this e-mail; you must not use, disclose, copy, print or disseminate the information contained within this e-mail.

Please notify the author immediately by replying to this email. Any views expressed in this email are those of the individual sender, except where the sender specifically states these to be the views of the London Borough of Redbridge.

This email has been scanned for all viruses and all reasonable precautions have been taken to ensure that no viruses are present.

The London Borough of Redbridge cannot accept responsibility for any loss or damage arising from the use of this email or attachments.

[REDACTED]

From: [REDACTED]
Sent: 10 December 2018 15:24
To: Ewan Coke
Cc: DPD (Planning Service Area)
Subject: Re: London Borough of Redbridge Borough-wide Article 4 Direction
Attachments: Letter of Notification to households Dec 2018.pdf; Notice of Making an Article 4 Direction for HMOs Nov 2018.pdf; Article 4 Direction Copy.pdf

Hi Ewan,

Thank you your e-mail.

I am trying to understand everything in the letters attached, however the text is not quite plain English. Probably for a solicitor all this makes sense, however I find it difficult to understand what is actually happening.

Does Redbridge council is considering to allow permission to build on Green Belt and this is a consultation?

Kind regards
[REDACTED]

On Thursday, December 6, 2018, 12:07:38 PM GMT, Ewan Coke [REDACTED] wrote:

Dear Consultee,

RE: Article 4 Direction for the area of London Borough of Redbridge

Please find attached details of a borough-wide, non-immediate Article 4 Direction for Houses in Multiple Occupation, for which an eight-week period of consultation begins today, Thursday, 6 December 2018, and will continue until Thursday, 31 January 2019. You will find attached the following PDF docs:

- Letter of Notification
- Notice of Making and Article 4 Direction
- Copy of Article 4 Direction

The letter of notification contains details of the Article 4 Direction consultation period and how to submit your comments on the implementation of the Direction to the Council. You are advised to read all the attached documents carefully.

If you have any questions about the contents of this email or the consultation process please do not hesitate to contact the Planning Policy Team at dpd@redbridge.gov.uk.

Yours sincerely,

Ewan Coke

Senior Planning Officer

Property, Planning and Regeneration

Chief Executive's Department

London Borough of Redbridge

11th floor Lynton House,

255-259 High Road

Ilford, Essex IG1 1NN

[REDACTED]

From: [REDACTED]
Sent: 19 January 2019 08:50
To: DPD (Planning Service Area)
Subject: Redbridge Houses of Multiple Occupation

Follow Up Flag: Follow up
Flag Status: Flagged

Hi with regards to the above subject, I live in the Redbridge area on the Churchfields estate. We already have a house in Buckingham Road applying for HMO to which I strongly object.

It is absolutely ludicrous that small family homes are being converted to HMO's in our borough where the infrastructure is already struggling to cope. Schools, Doctors surgeries etc are all at breaking point already, parking is becoming more and more difficult and allowing greedy landlords to convert family homes to HMO's should not be allowed, and our council need to protect us from this happening

Regards

[REDACTED]

Sent from my iPhone

[Redacted]

From: [Redacted]
Sent: 14 January 2019 14:44
To: DPD (Planning Service Area)
Subject: Redbridge Council - Article 4 Direction

We are writing to register our concern that Redbridge council has not adopted Article 4 and as such support it's immediate adoption now as opposed to 6th December 2019, as we believe that such a delay would leave an open goal for HMO developers. This in turn may lead to over-development of the borough, negatively impacting on already overstretched resources and infrastructure.

We trust our views will be considered and look forward to hearing what the Council proposes to allay it's residents fears in this matter.

Kind regards

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 19 January 2019 08:50
To: DPD (Planning Service Area)
Subject: Redbridge Houses of Multiple Occupation

Follow Up Flag: Follow up
Flag Status: Flagged

Hi with regards to the above subject, I live in the Redbridge area on the Churchfields estate. We already have a house in Buckingham Road applying for HMO to which I strongly object.

It is absolutely ludicrous that small family homes are being converted to HMO's in our borough where the infrastructure is already struggling to cope. Schools, Doctors surgeries etc are all at breaking point already, parking is becoming more and more difficult and allowing greedy landlords to convert family homes to HMO's should not be allowed, and our council need to protect us from this happening

Regards

[REDACTED]

Sent from my iPhone

[REDACTED]

From: [REDACTED]
Sent: 06 December 2018 18:56
To: Ewan Coke
Subject: Re: London Borough of Redbridge Borough-wide Article 4 Direction

I do not understand why this mail has been sent to me. We do not live in or own or operate any house or houses in multiple occupation.

[REDACTED]

[REDACTED]

-----Original Message-----

From: Ewan Coke [REDACTED]
Sent: Thu, Dec 6, 2018 12:04 pm
Subject: RE: London Borough of Redbridge Borough-wide Article 4 Direction

Dear Consultee,

RE: Article 4 Direction for the area of London Borough of Redbridge

Please find attached details of a borough-wide, non-immediate Article 4 Direction for Houses in Multiple Occupation, for which an eight-week period of consultation begins today, Thursday, 6 December 2018, and will continue until Thursday, 31 January 2019. You will find attached the following PDF docs:

- Letter of Notification
- Notice of Making and Article 4 Direction
- Copy of Article 4 Direction

The letter of notification contains details of the Article 4 Direction consultation period and how to submit your comments on the implementation of the Direction to the Council. You are advised to read all the attached documents carefully.

If you have any questions about the contents of this email or the consultation process please do not hesitate to contact the Planning Policy Team at dpd@redbridge.gov.uk.

Yours sincerely,

Ewan Coke
Senior Planning Officer
Property, Planning and Regeneration
Chief Executive's Department
London Borough of Redbridge
11th floor Lynton House,
255-259 High Road
Ilford, Essex IG1 1NN

[Redacted]

From: [Redacted]
Sent: 04 January 2019 17:50
To: DPD (Planning Service Area)
Subject: Response to consultation on Article 4 Direction C4 HMOs

Follow Up Flag: Follow up
Flag Status: Flagged

Status: Private resident

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Dear Sir/ Madam,

I support the proposed the Article 4(1) Direction. The supporting evidence demonstrated saome of the potential consequences of such residential developments. If they are needed, their impact will clearly vary between locations and it is right that the council, representing nearby residents and the community as a whole, has powers to limit them to appropriate locations.

Yours faithfully,

[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 07 January 2019 16:28
To: DPD (Planning Service Area)

Follow Up Flag: Follow up
Flag Status: Completed

Hi Ewan I would like to email my support for the banning of small HMO's in the Redbridge area. Being on the same road as a current small HMO build (four adjoining buildings / Buckingham Rd) I know first hand the effect these HMO's have on residential areas.

I would appreciate if I could be kept up to date on the Article 4 direct for houses in multiple occupation 31st Jan 2019 initiative.

[REDACTED]

[Redacted]

From: [Redacted]
Sent: 10 January 2019 17:30
To: DPD (Planning Service Area)
Subject: ****URGENT NO TO BUCKINGHAM RD HMO****

Follow Up Flag: Follow up
Flag Status: Completed

Hi Redbridge,

I am writing to enquire why article 4 direction on HMO has not been implemented to be in line with the other London Boroughs.

I cannot express my utter disgust at how a council employee has capitalised on this insider information and decided to create a HMO in a residential area with full hindsight that Redbridge will implement this on the 6th Dec 19.

Pls advise if all internal approvals have been granted in accordance to your internal protocols and all necessary sign offs have been obtained.

Pls note that my in-house legal council will looking at your response.

I look forward to hearing your response.

Regards

[Redacted]

This email is private and confidential. If you received this email in error please delete it and notify us immediately and do not use, rely on, distribute or disclose it. Emails and their contents may be monitored for regulatory compliance, training, and other purposes. Emails are insecure and may contain viruses. We cannot accept responsibility for these risks.

We take our data protection and privacy responsibilities seriously and our privacy notice explains how we collect, use and share personal information in the course of our business activities. It can be accessed [here](#).

[Redacted]



[REDACTED]
[REDACTED]
JAN
Dear Sir / Madam

Houses of Multiple Occupation

Article 4 (1) direction

I am writing to urge that Redbridge Council falls into line with other councils, in that planning permission is required for all HMOs, and that this policy should come into effect immediately rather than 6 December 2019.

I am concerned that many properties have been developed in 5th Woodford, and in general spoiling the character of it. Plus the amount of cars causing problems with parking, it is over packed now.

I hope that this letter is taken into consideration

Yours Faithfully
[REDACTED]



Ministry of Housing,
Communities &
Local Government

Mr Ewan Coke
Senior Planning Manager
London Borough of Redbridge

By email: [REDACTED]

Please ask for: [REDACTED]
Tel: [REDACTED]
[REDACTED]

Our ref: PCU/A4D/W5780/3218089

Date: 14 December 2018

Dear Mr Coke

The Town and Country Planning (General Permitted Development) (England) Order 2015
London Borough of Redbridge – administrative area

I refer to your email dated 6 December 2018 notifying the Secretary of State that above-mentioned Direction was made on 3 December 2018.

You are reminded to advise the Secretary of State about confirmation of the Direction in those circumstances as set out in the regulations. It would also be helpful to know if the Council decides in due course not to confirm the Direction.

Yours sincerely

[REDACTED]

[REDACTED]

Planning Casework Officer

Seven Kings & Newbury Park Residents Association

Putting the people of Seven Kings and Newbury Park first and caring about our community.

Committee Members: Chairman - David Stephens; Vice-chairman – vacant; Secretary - vacant
Treasurer - Mark Hollebon; Membership Secretary and Press & Publicity Officer - Mark Kennedy;.

c/o

email:

Planning Policy Team
Front Office, Floor 11
Lynton House
255-259 High Road
Ilford IG1 1NN

25 January 2019

Dear Sir/Madam,

The Houses in Multiple Occupation Article 4(1) Direction 2018

I refer to your Letter of Notification of 6th December 2018 and accompanying documents relating to the above Article 4(1) Direction.

The Residents Association has given full consideration of the Direction and supports its implementation.

Yours faithfully



David Stephens, Chairman



Proposed HMO Article 4 Direction in the London Borough of Redbridge

National Approved Letting Scheme (NALS) Consultation Response

31 January 2019

An Introduction to NALS

NALS is an accrediting organisation for lettings and management agents in the private rented sector. NALS was established in 1999, by the Empty Homes Agency, with backing from the Royal Institution of Chartered Surveyors (RICS) the Association of Residential Lettings Agents (ARLA) and the National Association of Estate Agents (NAEA). NALS provides an overarching quality mark, easily recognised by consumers, with minimum entry requirements for agents.

NALS agents are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Agents must provide evidence that they continue to meet NALS criteria on an annual basis to retain their licence. The scheme operates UK wide and has 1500 firms with over 2000 offices, including a number of agents within the London Borough of Redbridge.

NALS was recognised by the GLA as an approved body for the London Rental Standard. We are also a co-regulation partner with Liverpool City Council and a recognised training provider under the Rent Smart Wales scheme.

NALS also administers the SAFEagent campaign (www.safeagents.co.uk), the purpose of which is to raise consumer awareness of the need to ensure that landlords and tenants should only use agents who are part of a Client Money Protection Scheme which offers reimbursement in the event that an agent misappropriates their money. The campaign is recognised by Government and SAFEagent is referenced in their How to Rent guide (www.gov.uk/government/publications/how-to-rent).

We very much welcome the opportunity to contribute to this consultation exercise.

Overview

We understand that Redbridge Council recently made a non-immediate HMO Article 4 Direction that applies borough wide and will have the effect of withdrawing permitted development rights for a single-family property (use class C3) to be converted to a small house in multiple occupation (HMO) with between 3 and 6 occupants (use class C4).

We understand that the council are currently consulting on the HMO Article 4 Direction and that if it is confirmed, it will come into force on 6 December 2019.

In preparing this response, we have studied the council's Planning Policy and Research Paper dated December 2018 and we thank you for sharing the information.

Observations on Redbridge Planning Policy and Research Paper

We welcome your finding that HMOs are an important part of the private rented sector and can provide a good standard of affordable accommodation.

Whilst you mention how some HMOs can have a negative impact on a local community, many of these factors can be properly addressed under the council's borough wide mandatory HMO and additional licensing schemes, together with other associated housing enforcement powers.

It is important to note that the HMO Article 4 Direction will only impact on new HMOs created after the implementation date. In addition, once planning permission has been granted, any issues regarding crime and anti-social behaviour, housing condition or property management would be addressed using other enforcement powers.

The research paper says that "*a significant proportion of privately rented properties are HMOs*" and estimates there are approximately 11,250 HMOs in the borough. This is indeed a very high figure although we understand this is based on statistical modelling carried out in 2014. It is unclear if this has been verified by other means.

In referring to other data sources including the census (2011), ONS (2006-2016), selective licensing evidence base (2016) and predictive tenure intelligence model (2017), whilst this helps to illustrate the nature, geographical spread and growth in the private rented sector, it makes no specific reference to HMOs.

The HMO-specific data contained in the report is limited. It says the predictive tenure intelligence model has identified 651 HMOs out of a sample size of 3,600 rented properties, representing around 18%. It does not indicate how many of these properties fall within planning use class C4 and the percentage is far lower than the 50% HMO prediction in the 2014 statistical modelling exercise.

Planning records account for just 160 HMOs with 363 enforcement cases opened in ten years, which seems relatively low for a borough with over 20,000 private rented homes.

We would have expected the borough wide mandatory HMO and additional licensing schemes to be the main source of information as all HMOs have required licensing since 13 April 2017. However, against the projection of 11,250 licensable HMOs, the report indicates only 332 HMOs have been licensed.

If there are only 332 licensed HMOs 18 months after the licensing scheme started, this suggests the 2014 statistical modelling commissioned by the council may contain a high margin of error. Alternatively, it would suggest over 95% of HMO landlords have failed to comply with the licensing scheme. Given the reliance on the statistical modelling data to justify this planning intervention, we would welcome

further clarification on this point as it is fundamental to the business case being presented.

The ASB and crime data in Part 4 acknowledges there is no breakdown of the data for HMOs. Whilst there is reference to crime levels in areas that have a higher concentration of HMOs it is unclear how imposing planning restrictions on all new HMOs will help to reduce burglary or prostitution, which are two of the key issues highlighted.

Part 5 makes reference to housing conditions and overcrowding but acknowledges the council has no direct evidence relating to HMOs. These issues can be addressed using existing enforcement powers under the Housing Act 2004.

Part 6 suggests an important driver for this planning intervention was a resident petition from 2017 with 180 signatures. Within the issues highlighted, confusion about planning rules, illegal HMOs, health, safety, sanitation and fire safety can all be addressed using powers under the Housing Act 2004 and by publishing clear guidance to explain HMO planning rules.

Making reference to council tax not being collected is of limited relevance, as landlords are responsible for most HMO council tax payments and can already be pursued in the event of non-payment.

Likewise, the reference to illegal pavement crossovers on residential properties can be enforced using existing highway enforcement powers.

Whilst Part 7 of the report highlights the shortage of family accommodation, one of the strengths of the private rented sector is its ability to adapt to the changing nature of housing demand. Due to the lack of affordable accommodation, many tenants are reliant on shared accommodation in order to live, work and study in London. Reducing access to shared accommodation risks aggravating the housing crisis for single people who have less opportunity to obtain social housing.

Having reviewed the evidence base compiled by the council, we do not agree it is reasonable to conclude “...HMOs very probably exist in high numbers borough-wide” and that this provides adequate justification for following the proposed course of action.

HMO Article 4 Direction will reduce flexibility in the housing market

Whilst bedsit-HMOs are often perceived to be most problematic, the planning system does not differentiate between different types of HMO.

For example, a house comprising five bedsitting rooms occupied by five individuals who do not know each other, do not socialise together and eat, live and sleep in their own room is in the same use class as five students on one tenancy agreement who moved in as a group and have chosen to live together as friends.

If the HMO Article 4 Direction is confirmed, both scenarios would be equally affected, which in turn would significantly reduce the flexibility in the housing market.

At present, NALS' letting and managing agents work closely with private landlords to advise on the most appropriate letting model in order to meet housing demand. When a property becomes available for letting, it is not unusual for a house or flat to alternate between a single family let and shared accommodation according to the needs of the housing market and without any physical alterations to the property.

Implementing an HMO Article 4 Direction disrupts this flexibility. Once implemented, if an NALS' agent is approached by three sharers for a property previously let to a family, they could not be given a tenancy without first seeking planning permission, which would involve an unacceptable delay.

Likewise, if a family express an interest in a property previously let to sharers, the landlord may reject their offer so they do not lose established use. If the landlord accepts the single-family tenancy, the property would revert to use class C3 with a further planning application needed if the property is let to sharers in the future.

Adopting a more targeted area-based approach

If an HMO Article 4 Direction is to be implemented, we would encourage the council to consider more limited geographical coverage to target those areas with a higher concentration of HMOs. This would require planning consent for small HMOs in perceived hot-spot areas, whilst allowing a more flexible approach in other parts of the borough.

There are already many examples of council's operating in this way. For example, Haringey Council has an HMO Article 4 Direction covering the east of their borough, Hillingdon Council has an HMO Article 4 Direction covering two wards and Southwark has two HMO Article 4 Directions covering just two streets.

We would request that the council give this idea further consideration.

Regulation of letting agents

To achieve better overall regulation of the private rented sector and improve consumer protection, it is important the council takes a holistic approach that extends far beyond the proposed HMO planning restrictions.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, a further requirement was introduced requiring agents to display all relevant landlord and tenant fees, the redress scheme they belong to and whether they belong to a client money protection scheme, both in-store and on the company's website.

To assist councils in regulating the private rented sector and effectively utilising these enforcement powers, we developed the NALS Effective Enforcement Toolkit. Originally published in June 2016, the toolkit has recently been updated in conjunction with London Trading Standards. The toolkit can be downloaded free of charge from the NALS website (<https://www.nalscheme.co.uk/latest-nals-effective-enforcement-toolkit-stamps-out-rogues/>).

Should you wish to discuss any aspect of this consultation response, please do not hesitate to contact me. Can you also please confirm the outcome of the consultation exercise in due course.

Isobel Thomson
Chief Executive



Tel: [redacted]
Email: [redacted]
Website: www.nalscheme.co.uk

31 January 2019

Response to Redbridge Council's proposal for Article 4 Direction

January 2019

Introduction

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents more than 40,000 individual landlords from around the United Kingdom. We provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. We seek a fair legislative and regulatory environment for the private rented sector, while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. We thank Slough Council for providing us with the opportunity to comment on the selective licensing proposal.
5. The National Landlords Association (NLA) would like to thank the Redbridge Council for including us in your consultation but would like to highlight some concerns with regard to the Direction made by the Council under Article 4 (1) of the Town and Country Planning (General Permitted Development) Order 1995.
6. The introduction of an Article 4 Direction will have an impact on the housing market in Redbridge. This can be seen from the introduction in other councils, reducing supply of shared housing.
7. An Article 4 Direction is undoubtedly a powerful tool for local authorities when used appropriately. However it should be considered as an option of last resort, rather than another tool to be applied liberally and especially across all wards within a Local Authority. The example in Bath and North East Somerset council highlights how the implementation of an Article 4 Direction¹ has stopped residents selling their property. It does not convert houses back from shared housing but rather crystallises the existing housing stock.

Use Class C4

8. It is our view that the introduction of Use Class C4, in relation to HMO accommodation, is unnecessary and serves only to create greater confusion and bureaucracy for the private rented sector. The Government 'Planning Portal' determines that:
*"The purpose of the planning system is to ensure that development plans and planning applications contribute to the delivery of sustainable development. This means that the right development is in the right place and at the right time."*²

¹ <http://www.bathchronicle.co.uk/Bath-family-trapped-Oldfield-Park-student-housing/story-20923538-detail/story.html>

² The Planning Portal, <http://www.planningportal.gov.uk/>, July 2010

9. This statement defines the rationale governing permitted development which is an important tool for managing reasonable and justifiable development. However, it is the NLA's contention that the establishment of a small HMO (as defined by the recent regulations) does not represent a substantial change of use in terms of the burden imposed on local infrastructure. The usage of local services is unlikely to be greatly different for a property shared by three unrelated renters than a family with teenage dependents. This position is supported by the recent Lancashire planning appeal Ref: 100-067-072 which stated:

*"The continued use of an end of terrace house in Lancashire as a house in multiple occupation was allowed, an inspector reasoning that noise should be little different from that made by a typical family. The next-door neighbours referred to disturbance from televisions, people moving around the property and doors slamming, claiming that it extended well into the evening on occasion. However, the inspector reasoned that in properties in family use many bedrooms occupied by children, and particularly teenagers, contained televisions and audio equipment. Thus, whilst tenants might be inconsiderate on occasion, the same could be said of any type of occupier. Moreover, she found no evidence to support the generalised assertion that occupiers of an HMO were intrinsically more disposed to coming and going in the late evening or early morning hours than occupiers of other property types. She acknowledged that some tenants could work on a shift basis or during night time hours but given the limited number of occupants she did not consider that the comings and goings would be materially different from that associated with a typical household."*³

10. Therefore, the NLA does not believe the justification put forward by the Redbridge Council for introducing further demarcation into existing housing stock for the purpose of controlling the legitimate use of property.

HMOs and Shared Housing

11. The trends in future UK housing demographics along with the current state of housing finance and supply of affordable housing especially with the changes to Welfare, point to a greater need for shared housing/HMO-type housing in and around the city of Redbridge. The flexibility and affordability that HMOs and shared housing provide are critical for many who either cannot afford or do not want the liabilities involved in owning their own home or indeed living on their own.
12. In addition to young professionals and students, migrants make up an important part of the shared housing market the UK. For obvious economic reasons and for flexibility, shared housing is an important source of housing for these groups. However, demand is not static.
13. The characteristics of HMO's appeal to certain groups due to the transient nature. These households are not intended to 'grow roots' or stay in the same home for a generation. HMOs and shared housing are popular amongst certain socio-economic groups precisely because they provide a fluid housing option. To remove this housing provision will have a detrimental impact on the economic and social impact of communities.
14. The NLA believes that the council also has not taken into consideration the impact of the introduction of Universal Credit and the increased requirement of shared housing.
15. Too often local residents fall into the fallacy that it is the house itself rather than the household which causes an issue. They build up a 'general feeling' about areas of particularly dense shared housing, without looking to see whether particular problems have been dealt with. This aggregation of issues, particularly grievances and 'general feelings' about a community can quickly make residents feel that a 'tipping point' has been reached.
16. This problem is compounded where residents are not made aware of any specific action taken by a landlord or local authority against a particular household and so are ignorant of any work being done to tackle issues important to them. A council or landlord could be building a case against a tenant which takes time while another resident which redress immediately. The introduction of Article 4 Direction will not alter this process and builds false hope, as a solution.

³ Planning Appeal Decision Ref: 100-067-072, A Roland (Inspector), 2010

<http://www.compasssearch.co.uk/compass/faces/casebook2.jsp>

17. The NLA agrees that some landlords, most often due to ignorance rather than roguish intent do not use their powers to manage their properties effectively. Equally councils do not use the powers they have to enforce unacceptable behaviour in the community. The NLA would recommend that rather than an Article 4 Direction is introduced, a more appropriate response would be to identify issues and assist landlords to develop the required knowledge and skills to improve the sector.

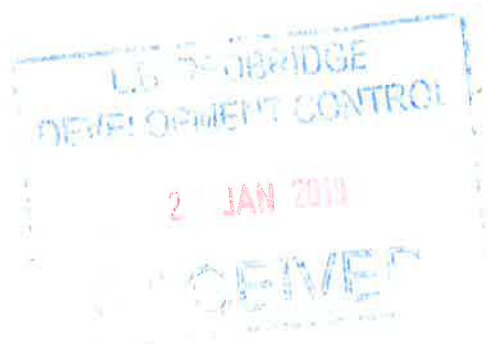
Justification

18. Redbridge Council faces a shortage of housing with high levels of demand across all tenures, including a considerable need for rented accommodation. As providers of private residential accommodation, landlords base their business plans on existing population and expected future demand. They are well placed to react to changes in demand with greater flexibility than social housing providers or the market for owner-occupied property.
19. The proposed Article 4 Direction is likely to erode the ability of landlords in Redbridge to react to changing circumstances and the needs of the local community by removing the general permissions currently available for development. This measure will act as a distorting influence on the City's housing market as property with implied permission through existing use will be regarded as premium investment assets by landlords offering shared housing. While the presence, or lack of, C4 designated properties in certain localities will diminish the stability of property values according to consumer demand.
20. Further, the Department for Communities and Local Government Replacement Appendix D to Department for the Environment *Circular 9/95: General Development Consolidation Order 1995* (978 0117531024)⁴ of November 2010 states at Paragraph 2.4 "there should be particularly strong justification for the withdrawal of permitted development rights".

Conclusion

21. The impact of the introduction of an Article 4 Direction in other cities in the UK has seen shared housing stay shared and an increase in rents due to a shortage of shared housing when there is a demand for it.
22. The NLA would like the council to develop a map of where HMO's can be developed in Redbridge and the number in each ward? We look forward to a response in relation to these matters.
23. Again, the NLA would like to thank the Redbridge Council for the opportunity to respond to this consultation and hope you find our comments useful.

⁴ Available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1759738.pdf>



Planning Policy Team
London Borough of Redbridge
11th Floor, Lynton House
255-259 High Road
Ilford
IG1 1NN

22 January 2019

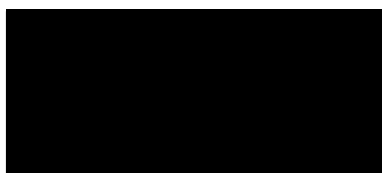
Dear Sirs

I am concerned to learn that LBR – unlike most other London Boroughs - has not adopted what is known as an 'Article 4 Direction'.

I understand there is now a consultation period in process and I would strongly lend my support to extending planning permission to include HMOs of any size.

It is imperative that residents have the ability to challenge any projects which could lead to overdevelopment and destruction of the local area.

Yours faithfully



24 JAN 2019

21-1-19

Dear Sir/Madam,

RECEIVED

I am writing to give you my full approval for the implementation of Article 4 on 6th December 2019.

I confess to a vested interest in this matter as the property next door to mine is in the process of being converted to an HMO, which has caused great disruption and anxiety to the local community. However, despite this personal interest I believe it is imperative that Article 4 is implemented by a council that has already allowed far too many HMO's to blight the area and the lives of the people it purports to serve.

Yours Sincerely,

[Redacted Signature]