



Haringey Council

APPENDIX 2

Haringey HMO and Planning Policy Development Research Paper, August, 2012



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1. INTRODUCTION

- 1.1 HMOs are defined as a “single dwelling house or self contained flat in a house organised in such a way that it becomes occupied by a number of separate households” (Haringey Unitary Development Plan, 2006, page 80).
- 1.2 This paper provides a summary of the research on Houses in Multiple Occupation (HMOs) in Haringey undertaken to inform:
- the development of a new planning policies for Houses in Multiple Occupation (HMOs) in Haringey; and
 - the decision on whether to make an Article 4 Direction to remove the current permitted development rights that allow a single family dwelling to be used as a small HMO (for 3- 6 people) without planning permission.
- 1.3 Under planning law different types of properties are identified as different classes. These are defined in the Planning Use Class Order. The Planning use Class Order differentiates between small and large HMOs.
- 1.4 A planning Use Class C4 Houses in multiple occupation (small HMO) is the use of a single family dwelling by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom. Large HMOs of 6 or more occupants are Sui Generis – and require generally planning permission¹. Currently changes of use between single family dwelling houses (Planning Use Class C3) and Small HMO's (Planning Use Class C4) do not need planning permission as this is 'permitted development'. However, the Government has given Councils the power, through the use of an Article 4 Direction, to remove this these permitted development rights
- 1.5 It is important to be aware of the different definitions between planning and licensing legislation. Under the Housing Act 2004, a HMO means a building (or part of a building, such as a flat), that:
- is occupied by more than one household and where more than one household shares, or lacks an amenity, such as a bathroom, toilet or cooking facilities;
 - is occupied by more than one household and which is a converted building, but not entirely into self contained flats (whether or not some amenities are shared or lacking);
 - is converted self contained flats, but does not meet as a minimum standard the requirements of the 1991 Building Regulations (known as s275 HMOs), and at least one third of flats are occupied under short tenancies.
- 1.6 Licensing of HMOs under the Housing Act, 2004 is mandatory for properties let out that are of three or more storeys high; have five or more people in more than one household and share amenities such as bathrooms, toilets and cooking facilities. 'Additional Licensing' schemes can be introduced to require licensing of smaller HMOs. Haringey has such as scheme in operation

¹ While permission is generally required for 6 or more units this is not automatic as Government guidance stipulates there must, in addition, be a material change from use as a Single Family Dwelling.



2. BASELINE RESEARCH ON HMOS IN HARINGEY

(A) Quantum and Spatial Distribution of HMOs

Census 2001 Data on Accommodation Types

- 2.1 In 2001 25.9 % of households lived in part of a shared or converted house including bedsits Figure 1 below shows the numbers of different types of housing by ward based taken from the 2001 census. The outputs of the 2011 Census will allow changes to the types of accommodation over time to be fully analysed. However, the research presented in the remainder of Section (A) indicates some growth in the quantum shared accommodation – both in the number of HMOs and in related but distinct issue of conversions of single family dwellings to self contained flats along with significant clustering particularly in east Haringey.

All household spaces	Number of all household spaces which are of accommodation type:			Number of all household spaces which are of accommodation type:			
	Whole house or bungalow:			Flat maisonette or apartment:			Caravan or other mobile or temporary structure
	Detached	Semi-detached	Terraced (including end-terrace)	Purpose built block of flats or tenement	Part of a converted or shared house (including bed-sits)	In a commercial building	
Harringay	105	348	1,405	544	2,098	152	3
Noel Park	152	400	2,114	1,101	943	131	23
West Green	126	355	1,835	1,485	1,014	63	5
St Ann's	139	292	2,156	1,320	927	174	5
Tottenham Green	191	420	1,716	1,952	938	123	10
Bruce Grove	191	429	2,112	902	1,338	98	15
Tottenham Hale	178	418	1,961	2,169	465	53	7
Seven Sisters	176	443	1,866	1,691	916	79	5
Woodside	134	510	1,875	1,229	1,131	109	0
Bounds Green	98	624	1,204	1,793	1,243	93	5
White Hart Lane	209	854	2,363	1,026	190	43	6
Northumberland Park	175	351	1,548	2,387	688	92	7
Alexandra	121	748	1,403	700	1,404	42	0
Fortis Green	278	900	1,177	1,388	1,105	138	3
Muswell Hill	106	583	1,351	820	1,462	132	0
Highgate	346	436	875	1,406	1,988	136	3
Crouch End	116	429	830	1,751	2,234	209	3
Hornsey	71	207	1,329	1,292	1,720	99	5
Stroud Green	51	228	957	979	2,735	58	0
Haringey	2,963	8,975	30,077	25,935	24,539	2,024	103

Figure 1: Household Accommodation Types (Percentage), Census 2001

Identification of Conversions to HMOs in Haringey

- 2.2 Accurate identification of the total number of HMOs (and growth in HMO development) in different areas of Haringey is not straightforward. A picture of the spatial distribution and density of HMOs across Haringey has been built up via available data on HMOs licensed under the Housing Act 2004, Council tax data, planning applications related to HMOs and to lesser degree data from the electoral register. This data is invariably incomplete, due to under reporting and/or unauthorised development, despite a focused programme of engagement and enforcement



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under both the planning and licensing regime in connection with Council tax. This – along with differences in definition – account for the inconsistencies in the datasets presented below.

2.3 In 2010 a street based survey was undertaken in Harringay ward² to support the roll out of the Additional Licensing Scheme. This survey revealed that 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). It identified that 42% (501) of the properties visited were potentially used as HMOs (as defined under the Housing Act 2004). The percentage of properties visited which were shared/bedsit type HMOs was just under 9% (102) and the proportion which were found to be potential s257 HMOs³ was just under 34% (399). This issue is not limited to Harringay ward, in 2008 the number of HMOs was estimated to be 10,000 (Housing Standards Supplementary Planning Guidance, 2008).

Mandatory and Additional Licensing of HMOs under the Housing Act 2004

2.4 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. In July 2012, there were 271 mandatory licensed HMOs in Haringey. This is an increase from 255 in 2011. A further 18 have been licensed so far under the additional licensing scheme which was implemented in Haringey last year. The bar chart below in Figure 2 illustrates the number of licensed HMOs in Haringey.

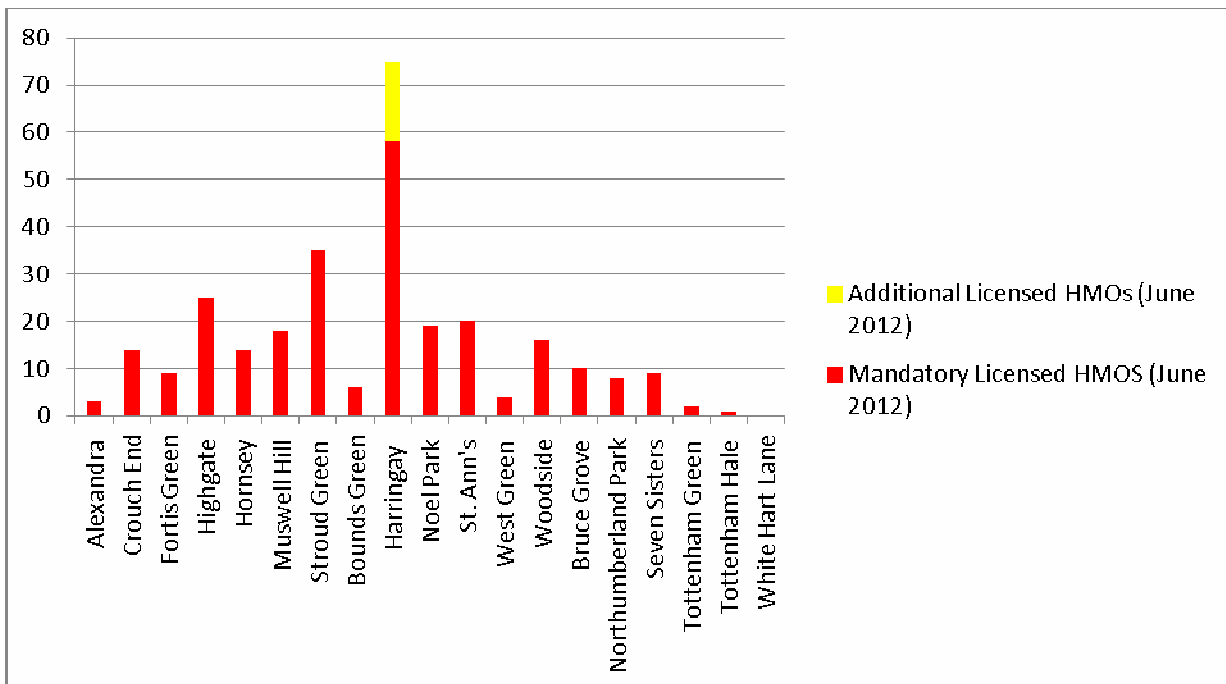


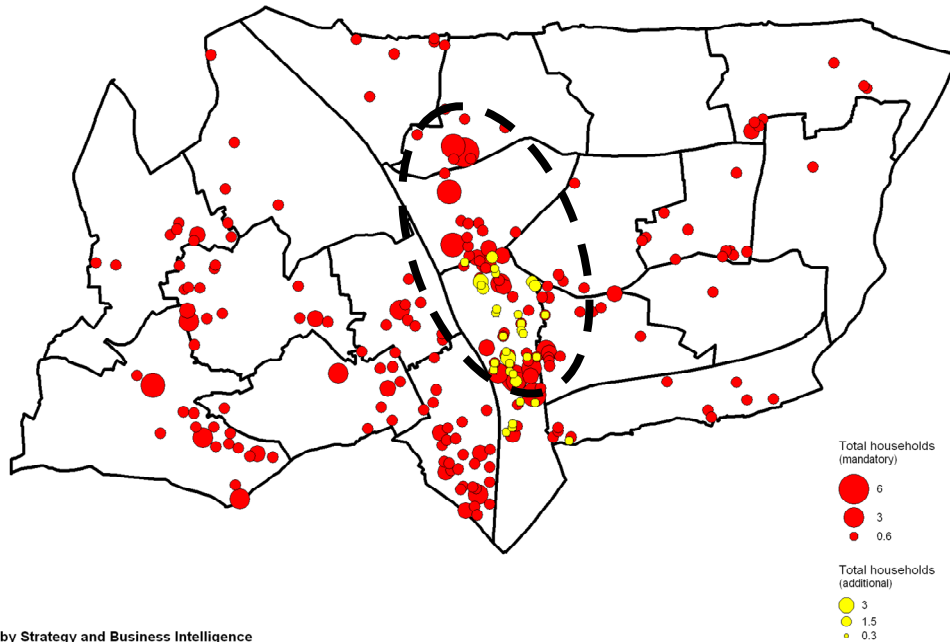
Figure 2: Licensed HMOs under Housing Act, 2004 (August, 2012)

² The outcomes, reported in 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 Converted self contained flats that do meet as a minimum standard the requirements of the 1991 Building Regulations



2.5 Figure 3 below more clearly illustrates the spatial distribution of these across the borough. And highlights a very large cluster of HMOs centred in Harringay ward.

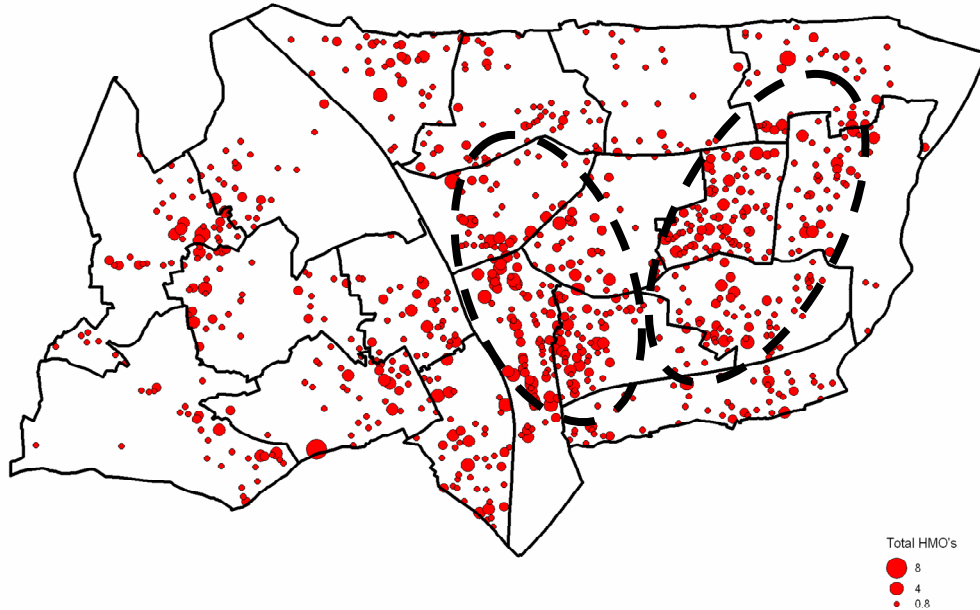


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Figure 3: Licensed HMOs under the 2004 Housing Act in Haringey. Note: Mandatory Licenses are shown in red and properties licensed under the additional centred on Harringay ward are shown yellow.

Council Tax 'Class C' HMOs

2.6 Council tax records are useful for capturing the spatial location of smaller HMOs. In July 2012, there were 1260 Council tax properties classified as HMOs, referred to as Tax Class C properties. The definition of a HMO for the purposes of Council Tax is different from that used in relation to planning use classes and the Housing Act 2004 and captures 2 or more occupants. Despite these limitations it provides a useful indication of the spatial distribution and in some areas clustering of HMOs as illustrated on Figure 4.



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Figure 4: Distribution of Properties Classified as HMOs for Council Tax Purposes, 2011

Surname Analysis of Council Tax Accounts

2.7 An analysis of Council tax data has been undertaken of households with 3 or more different surnames recorded on the Council Tax account. This data needs to be treated with caution as different surnames do not necessarily mean occupation by different households or unrelated individuals. This data suggests a growth in HMO development in east Haringey (and reduction in some parts of west Haringey). Figure 5 lists this analysis.



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01/04/2007		01/04/2008		01/04/2009		01/04/2010		01/04/2011		/04/2012	
Ward	Total	Ward	Total	Ward	Total	Ward	Total	Ward	Total	Ward	Total
Harringay	188	Harringay	208	Harringay	228	Harringay	243	Harringay	259	Harringay	256
St. Ann's	158	St. Ann's	173	St. Ann's	157	St. Ann's	190	St. Ann's	193	St. Ann's	226
Woodside	138	Woodside	137	Woodside	135	Noel Park	150	Noel Park	166	Noel Park	176
Highgate	118	Crouch End	123	Noel Park	134	Stroud Green	124	Woodside	144	Woodside	169
Noel Park	115	Noel Park	123	Highgate	130	Seven Sisters	123	Seven Sisters	137	West Green	158
Seven Sisters	110	Seven Sisters	122	Stroud Green	129	Crouch End	122	Stroud Green	134	Stroud Green	153
Crouch End	109	Highgate	118	West Green	123	Highgate	116	West Green	134	Seven Sisters	148
Stroud Green	105	West Green	108	Crouch End	121	Woodside	116	Highgate	120	Crouch End	137
Bounds Green	100	Stroud Green	106	Bounds Green	116	West Green	113	Crouch End	115	Highgate	129
West Green	98	Bounds Green	98	Seven Sisters	116	Tottenham Green	99	Bounds Green	113	Tottenham Green	112
Tottenham Green	92	Alexandra	93	Muswell Hill	99	Bounds Green	98	Tottenham Green	105	Bounds Green	108
Muswell Hill	91	Muswell Hill	92	Tottenham Green	98	Muswell Hill	91	Bruce Grove	98	Bruce Grove	98
Alexandra	84	Hornsey	85	Bruce Grove	95	Bruce Grove	90	Hornsey	90	Hornsey	97
Fortis Green	83	Tottenham Green	80	Hornsey	87	Hornsey	90	Fortis Green	74	Muswell Hill	85
Bruce Grove	72	Fortis Green	77	Fortis Green	81	Fortis Green	72	Muswell Hill	73	Alexandra	84
Hornsey	64	Bruce Grove	73	Alexandra	78	Alexandra	70	Alexandra	71	Fortis Green	67
Tottenham Hale	45	Tottenham Hale	55	Tottenham Hale	57	Tottenham Hale	45	Tottenham Hale	55	Tottenham Hale	61
White Hart Lane	29	White Hart Lane	38	White Hart Lane	36	White Hart Lane	23	White Hart Lane	25	White Hart Lane	30
Northumberland	20	Northumberland	15	Northumberland	14	Northumberland	20	Northumberland	19	Northumberland	24
Grand Total	1819	Grand Total	1924	Grand Total	2034	Grand Total	1995	Grand Total	2125	Grand Total	2318

Figure 5: Tables by ward of the estimate number of HMOs.

NB: The households included are those where there are 3 or more different surnames recorded under the Council Tax Account on the council tax system. The table count is for a specific date, 1st April for each year until the last date which is 1st April 2012



HMO Planning Applications

- 2.8 The planning applications register related to HMOs is only partial as it does not pick up on small HMOs, which are permitted development and therefore do not require planning permission. There has typically been an average of 3.4 applications per year since 2008 with a peak of 10 in 2008. These have been overwhelmingly located in east Haringey.

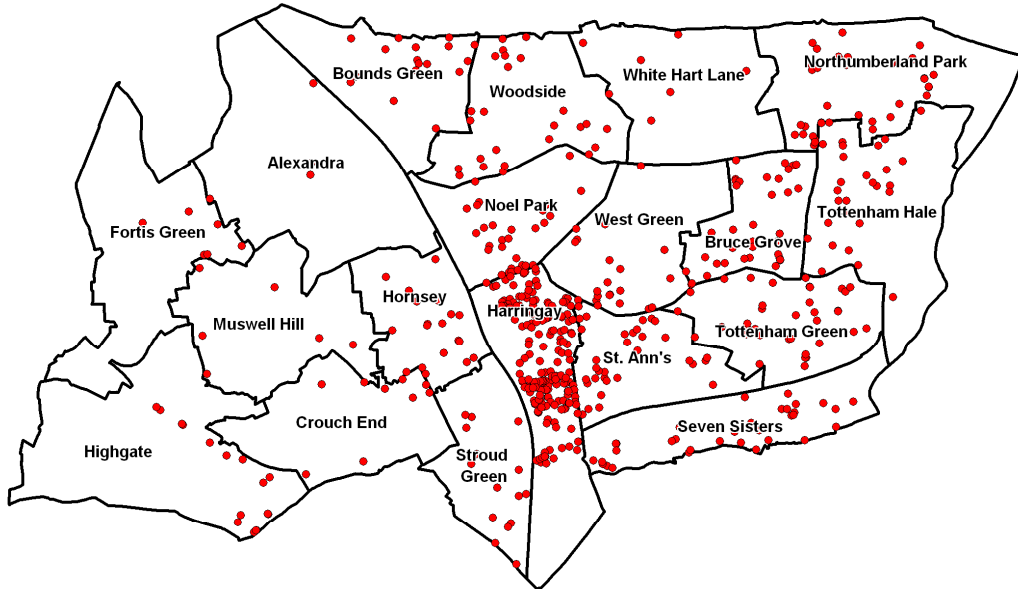
(B) Standards of HMO Accommodation

- 2.9 Housing in Multiple Occupation (HMOs) have been identified by the Council's Housing Improvement Team as the subject of a disproportionately high level of complaints about private sector housing as a whole⁴.

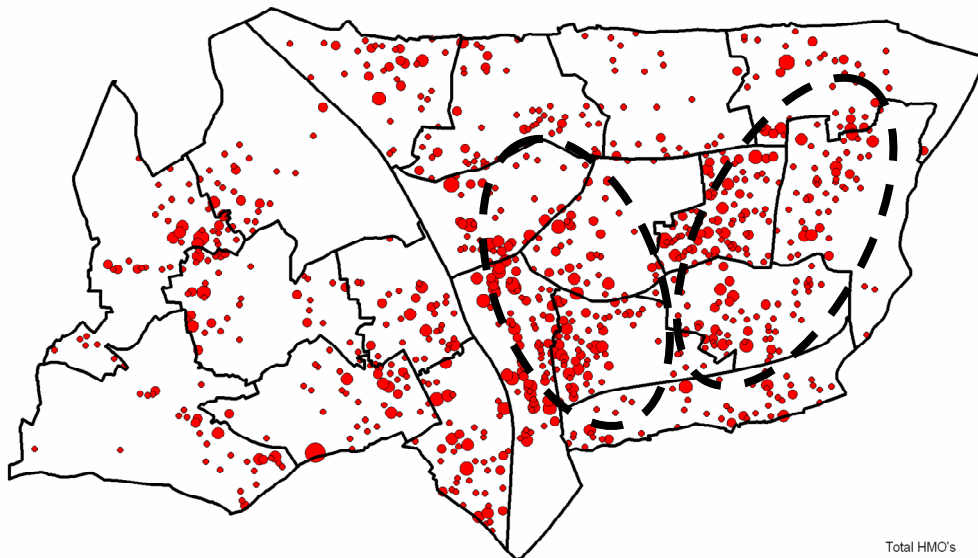
Complaints about HMOs to the Housing Improvement Team

- 2.10 Complaints specifically identified as HMO related from 2006 – July 2012 are shown on Figure 6 below (the Distribution of Properties Classified as HMOs for Council Tax Purposes, 2011). There were 686 complaints in total over this period. Haringay Ward accounted for almost 222 of these complaints. The Housing Improvement Team estimate that this under-represents the actual number of complaints related to HMOs - with several being coded as a different category of complaint.

⁴ Interview with Private Sector Housing Team, 31 July 2012



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Total HMO's
● 8
● 4
● 0.8

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Figure 6: Complaints received by the Council about HMO development (2006- July 2012) is the top map and the distribution of Properties Classified as HMOs for Council Tax Purposes, 2011 shown for comparison below.



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- 2.11 The extremely poor condition of some HMOs has prompted the roll out of an additional licensing scheme centred on Harringay ward which seeks to lift the quality of HMO accommodation. A similar additional licensing scheme for Tottenham is – at the time of writing this report – the subject of public consultation. The emerging research supporting the roll out of an additional licensing scheme in Tottenham suggests a high prevalence of HMOs that are of poor quality and/ or are unsafe. In the current consultation this has been clearly linked to the over intensification in the use of smaller Victorian terraces as HMOs. The photograph below (Figure 7) illustrates the type of poor quality private rented housing that the Housing Improvement Team (Private Sector) regularly comes across in the course of its work in Tottenham.



Figure 7: Cramped conditions in a HMO not meeting space standards. This room below was home to a family of 5 in an HMO with 4 other families.

- Planning enforcement action against unauthorised development*
- 2.12 Planning enforcement action related to unauthorised HMO development and conversions is overwhelmingly related to the east of the Haringey, representing the majority of the total of 355 enforcement notices⁵ served from January 2008 to July 2012. The permitted development rights for small HMOs raise particular planning enforcement challenges. Proving occupancy of more than six unrelated occupants and demonstrating a material change of use is especially challenging in light of the permitted development rights for small HMOs and in the absence of any obvious physical conversions. The spatial distribution of planning enforcement notices served related to HMOs and House Conversions only is illustrated on Figure 8 below.

⁵ Note this figure does not relate to total enforcement investigations which far exceed this number just the notices served based on the Council's Enforcement Register (and excluding withdrawn notices).

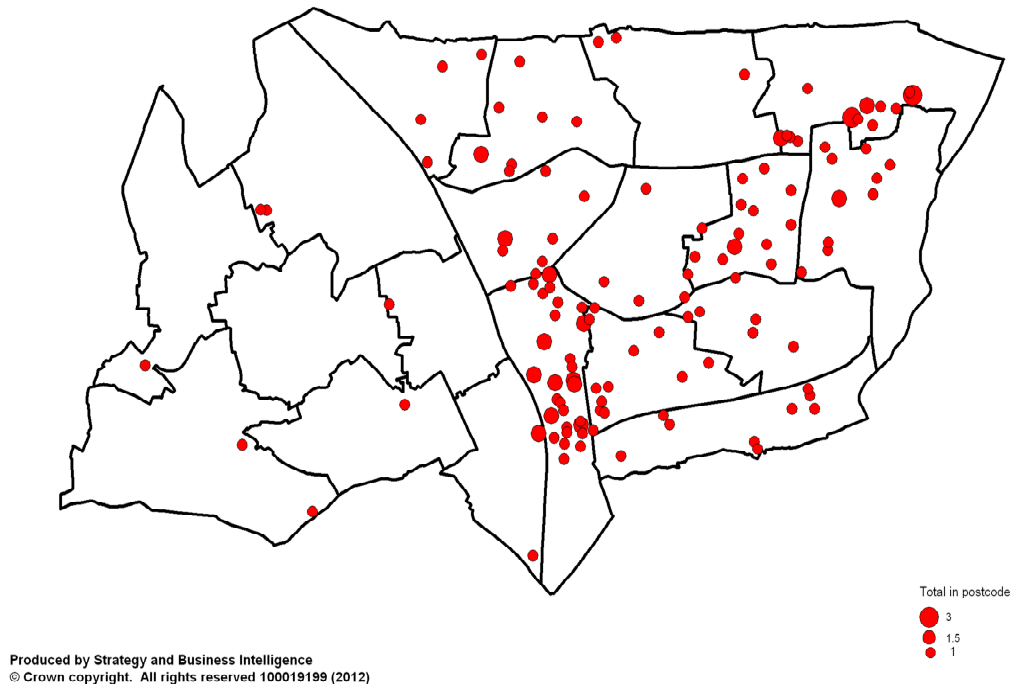


Figure 8: Planning Enforcement Action Related to Authorised House Conversion and Use of Single Family Dwellings as HMOs (from January 2008 to July 2012)

(C) Impacts of HMO Clustering

Impacts of HMOs

2.13 The Government published a report, Evidence Gathering – Housing in Multiple Occupation and possible planning response which sets out how to respond to the challenges of high concentrations of HMOs in 2010. The report identifies the following impacts that occur as a result of high concentrations of HMOs, the issues highlighted include:

- Anti-social behaviour, noise and nuisance
- Imbalanced and unsustainable communities
- Negative impacts on the physical environment and streetscape
- Pressures upon parking provision
- Increased crime
- Growth in private sector at the expenses of owner-occupation
- Pressure upon local community facilities, and
- Restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.

2.14 It is noted that many of the complaints about HMOs discussed under paragraph 2.12 above are frequently from neighbouring residents rather than the occupiers of HMOs themselves. Impacts of HMOs on neighbouring occupiers are a particular issue in areas with a significant cluster of HMOs and where the use of smaller properties is over intensified. This impact is compounded where there is also a high level of conversion of houses to flats. This type of problem of over intensifications, notably parking impacts, informed the Council's Unitary Development Plan 2006 policy approach on HMOs.



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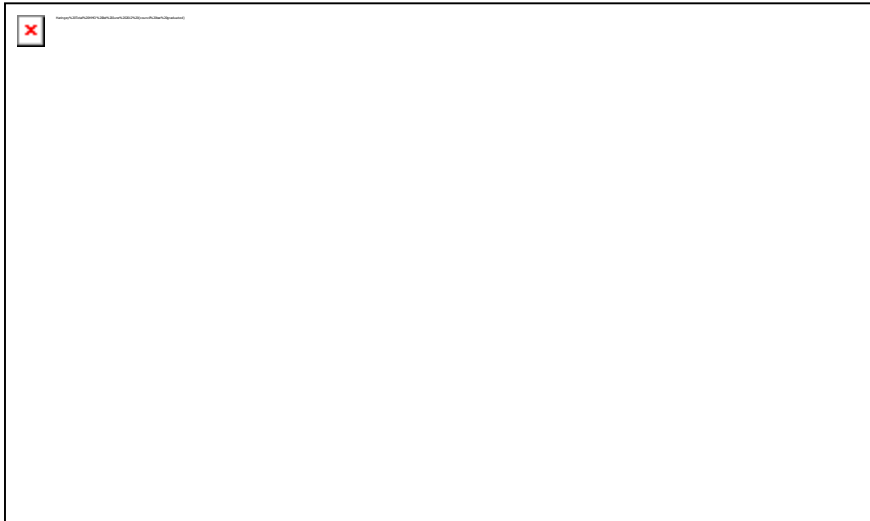
2.15 Research to support Additional Licensing of HMOs in Harringay ward⁶ highlighted some of these social and environmental impacts. Complaints about illegal dumping were highest in areas with high private rented and HMO development as shown on **Figure 9**. A similar pattern emerges with reference to crime and noise complaints.

⁶ Appendix 1 to 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

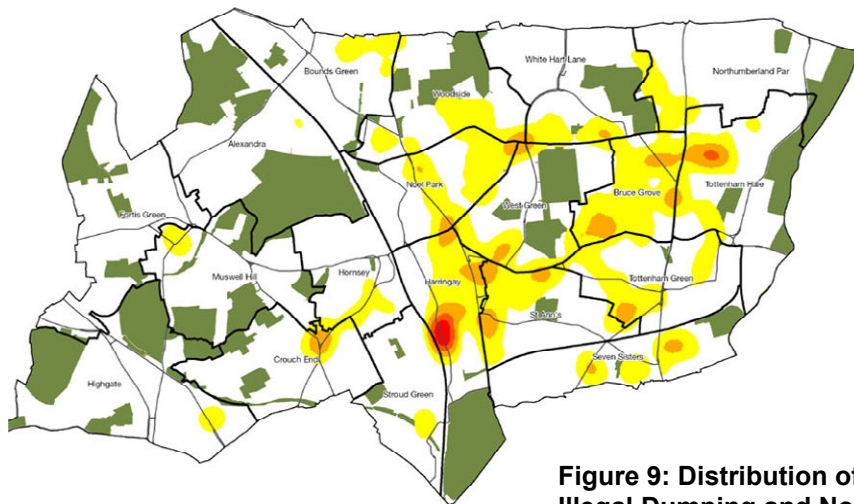


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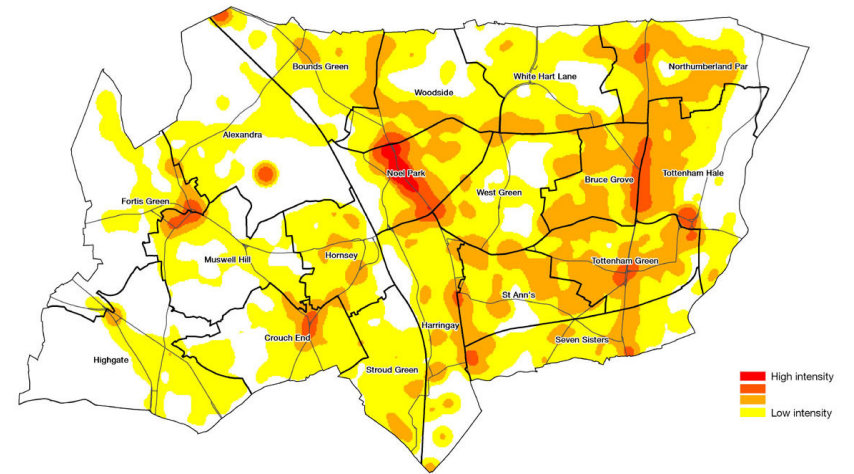
Distribution of Properties Classified as HMOs for Council Tax Purposes, 2011



Commercial & Domestic Dump Hotspots, 2011



Total Notifiable Offences (All Crime) Hotspots, 2011



Council Noise Calls, 2011

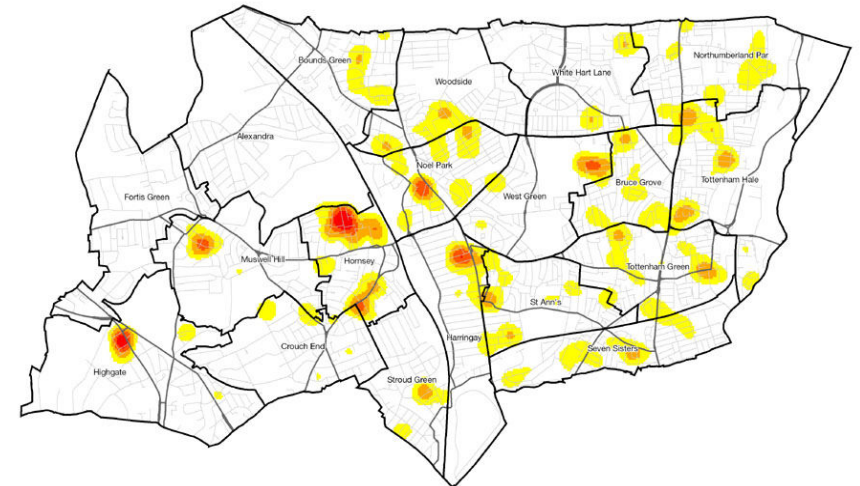


Figure 9: Distribution of HMOs and Spatial Pattern of Crime, Illegal Dumping and Noise Calls, 2011



Local Community Concerns about HMO Clustering

2.16 In Harringay ward there has been significant local concern about HMO impacts. It is clear from residents' meeting reports (e.g. Harringay and St Ann's Area Forum Meetings) that HMOS are perceived to have had a negative impact on the locality. However, the concern is much broader than just Haringey ward. Haringey Council HMO Conference held in November 2011, which included a range of stakeholders, identified the need for greater controls to help better manage HMO standards and impacts. A key recommendation arising from this Conference was to encourage the Council to consider the use of the Article 4 Direction to remove permitted development rights for HMOs.

Need for Family Housing/ Single Family Dwellings and HMO Demand

2.17 The Council's Strategic Housing Market Assessment 2009/10 identifies a need for larger family units in the market and social housing sector identified a need for a range of housing units over up to 2015. The range of housing need was spread across all unit sizes but a particular demand for family housing (3+ units) was evidenced in the market with a demand for 1,248 units and social housing need for a further 730 units.

2.18 The existing demand associated with family accommodation is evidenced in the profile of demand of those in greatest housing need, in bands A-C on the council's housing register (see Figure 12 below). Although focussed on the social housing sector, it serves to illustrate in general terms the particular need for low cost rental family accommodation in wards in east Haringey.

2.19 The figures show that across Haringey there are 4,393 households registered in Bands A-C, of which 1,822 (41.5%) require family accommodation (3 bed or more). The majority (76%) of the demand for family accommodation is in the east of the borough.

Ward	BEDSIZE_REQUIRED									Sub Total	Total
	1	2	3	4	5	6	7	9	Family Housing (3+ only)	All Sizes	
Harringay	38	79	53	8	1			1	63	180	
West Green	32	72	87	20	6				113	217	
Noel Park	28	85	86	25	3	1			115	228	
St. Ann's	53	92	68	21	2	3			94	239	
Tottenham Green	75	127	72	15	2	1			90	292	
Bruce Grove	73	169	98	27	4				129	371	
Tottenham Hale	48	108	135	35	6	1			177	333	
Seven Sisters	33	67	81	23	4	2			110	210	
Woodside	35	79	101	24	5				130	244	
Bounds Green	29	58	59	16	3				78	165	
White Hart Lane	46	70	75	32	8	1			116	232	
Northumberland Park	63	124	131	29	5		1		166	353	
Stroud Green	32	25	30	10	1				41	98	
Hornsey	27	57	45	7	1				53	137	
Crouch End	19	14	4	1	3				8	41	



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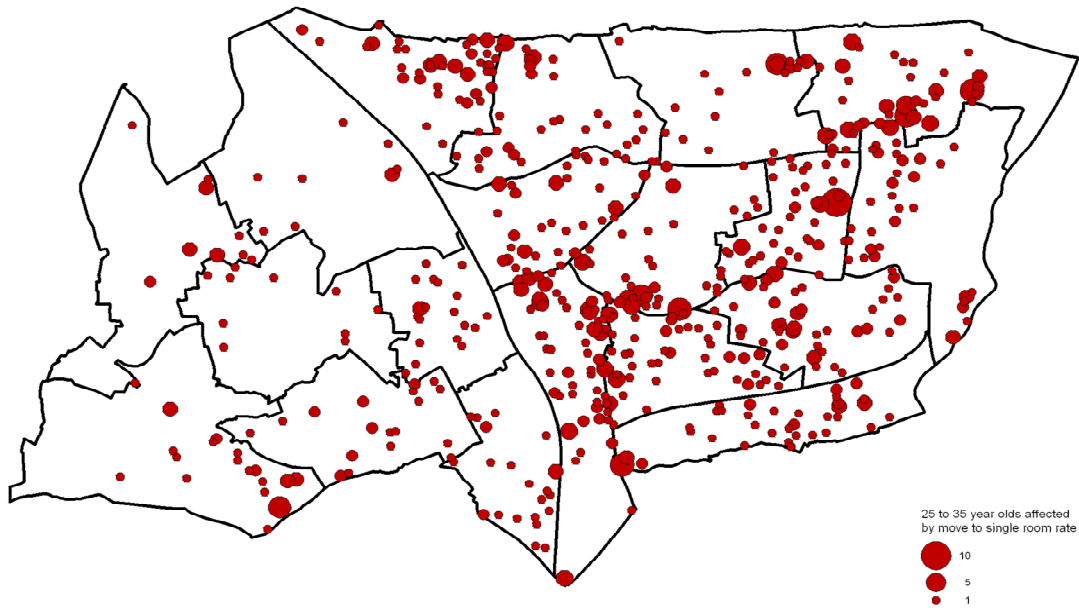
Highgate	17	15	11	2					13	45
Muswell Hill	13	7	7	2					9	29
Fortis Green	18	16	12	4					16	50
Alexandra	10	12	16	2	1				19	41
#N/A	195	411	237	43	2				282	888
Grand Total	884	1687	1408	346	57	9	1	1		4393

Figure 12: Housing need by unit size, housing register bands A to C (August, 2012)

- 2.20 Alongside this need for family housing are a number of factors fuelling demand for low cost private rented accommodation – such as HMOs. This has resulted in part from a sharp rise in the number of migrant workers coming to Haringey. Between 2002/3 and 2010/11, the Department for Work and Pensions completed just over 91,000 new national insurance registrations for overseas nationals in Haringey (the 4th highest in London). It was found that 67% of these migrant workers recorded the Parliamentary Constituency of Tottenham as their home.
- 2.21 Welfare Reform could have further implications for the demand for low cost, particularly smaller, private rented accommodation. Restrictions on the amount of Housing Benefit that can be claimed by single people under the age of 35 have also substantially increased the demand for shared housing in the private rental sector. Single people from 25 to 35 were previously eligible for the one bedroom rate but can now only claim under the shared accommodation rate. Since January 2012, the introduction of the Shared Accommodation Rate impacted on 846 claimants in Haringey between the ages of 25 and 35. Figure 13 below illustrated the spatial distribution of those individuals affected.
- 2.22 Further changes to the Welfare System are due to be implemented in 2013, and could lead to an increase in the demand for smaller private rented accommodation, including HMOs.
- 2.23 The Benefit Cap planned by the Government will limit the total amount that workless households will be able to receive in benefits to £350 a week for a single person and £500 for all others. It is part of the Welfare Reform Bill which will see the implementation of a single payment known as the Universal Credit (UC).
- 2.24 A new ‘bedroom tax’ will cut the amount of housing benefit that people can get if they are deemed to have a spare bedroom in their council or housing association home. From April 2013 all claimants who are deemed to have at least one spare bedroom will have their housing benefit cut by 14% and those who have two or more spare bedrooms will have their benefit cut by 25%.
- 2.25 These changes could result in households being unable to pay their rent and potentially lead to an increase in downsizing to smaller accommodation. This could result in increased demand for smaller private rented accommodation, including HMOs.



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2.26

Figure 13: Distribution of 25 to 35 years olds on housing benefit projected to be moved from January to August 2012 to the "shared accommodation rate" (2011)



3. SUMMARY & CONCLUSIONS

Evidence of Harmful Impact of unmanaged HMO Growth

3.1 The key implications of the research outlined above are summarised below:

- 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 evidence in Harringay ward which also has the highest number of Mandatory licensed HMOs⁷ 64 of a total of 311 (in 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 and an analysis of names on the Council Tax register indicate the presence a significant and growing concentration of HMO development across east Haringey (see Figure 4 and 5).

- 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. Planning enforcement action related to unauthorised HMOs (and the related issue of house conversions) is overwhelmingly concentrated in east Haringey (see Figure 8). 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.

⁷ 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.



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.

Need for a Mix of Housing Types and Balanced Communities

- 3.2 HMOs are an important source of lower cost housing within the private rented sector. However this needs to be balanced against the current demand for family accommodation in Haringey. Increased demand for HMO accommodation and the current permitted development rights for small HMOs could impede Council objectives to protect family housing. Changes to the Welfare System are likely to increase demand for HMO accommodation. These changes could contribute to increasing the possibility of landlords seeking to use of small single family dwellings as HMOs.
- 3.3 At the strategic level the one likely effect these trends is to reduce the availability of family housing *and* increase the risk of even greater clustering of small HMOs. At the level of individual dwelling level these trends also increases the risk of this use becoming over intensified and overcrowded – with consequent impacts on the amenity of surrounding occupiers. The lower house prices and smaller house sizes in east Haringey suggest that these problems are at greatest risk of worsening in this part of the borough.

Recommendation to make an Article 4 Direction Covering East Haringey

- 3.4 Accordingly it is suggested that an Article 4 Direction to control HMOs should include all wards east of the East Coast Railway line.
- 3.5 The proposed boundary is informed by the following considerations:
- The west of the borough has higher house prices and higher levels of owner occupancy compared to the east (Housing Strategy, 2009 – 2019). These factors are likely to combine to make it less accessible to landlords seeking to maximise returns by over intensifying the use of single family dwellings.
 - The west of the borough typically has large housing sizes. Areas with high numbers of HMOs such as Stroud Green have a higher number of large HMOs which are already subject to the need for planning permission as well as being subject Mandatory licensing (see Section 2, Figure 7 above).
 - Numbers of HMOs are, as expected, lower in areas in Northumberland Park and White Hart Lane where there are high levels of social housing – but there has been significant growth in private sector housing in this location and enforcement action related to HMOs and house conversions indicates that this area should be included (see Annex



Haringey Council

1). In addition, houses multiple occupancy can be found within dense areas of social housing; for example, Homes for Haringey has 1582 registered leaseholder sublets, 96 of which are known multiple sublets (i.e let to more than one person).

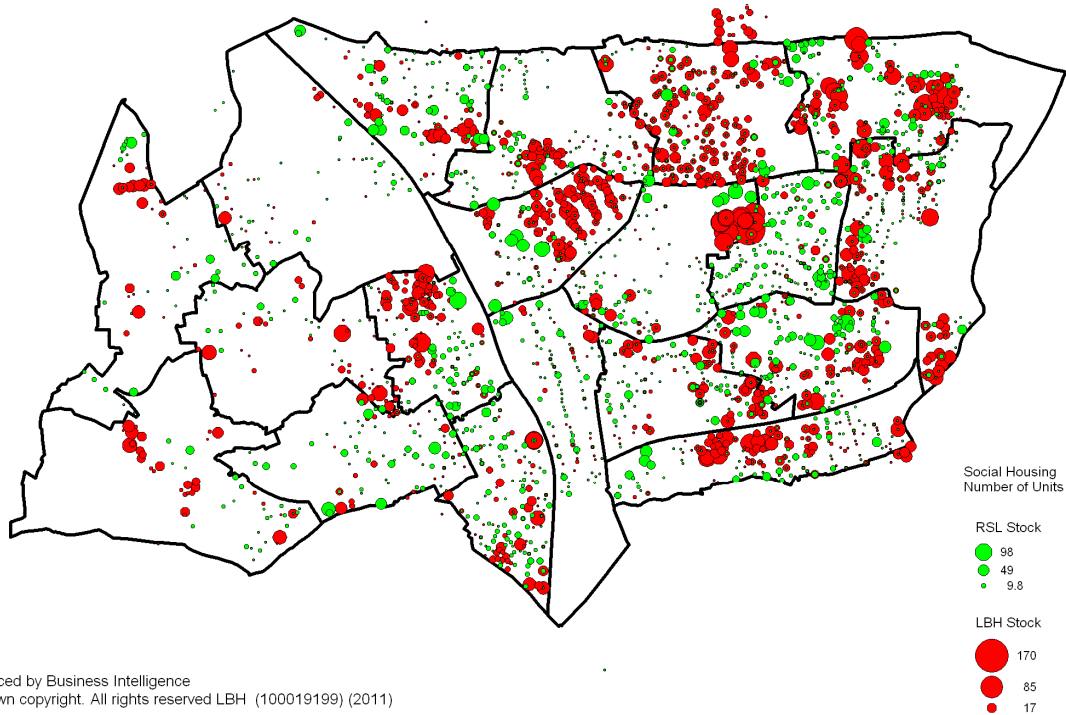
- Enfield Council is currently consulting on the roll out of an Article 4 Direction to removed permitted development rights related to HMOs. The exact extent of which is still to be decided – but could cover the whole of the London borough of Enfield⁸. There is small risk that this could displace HMO development into Haringey in the absence of similar controls.

⁸ Barking and Dagenham Council who implemented have made an Article 4 remove HMO permitted development rights across their borough and which came into effect in May 2012. Newham Council, who are at making an Article 4 Direction to control HMOs



ANNEX 1

The areas of east Haringey with the lower numbers of HMOs in east Haringey (that is wards east of the East Coast Railway Line) have higher concentrations of social housing. The distribution of social housing in Haringey is as shown on the map below.

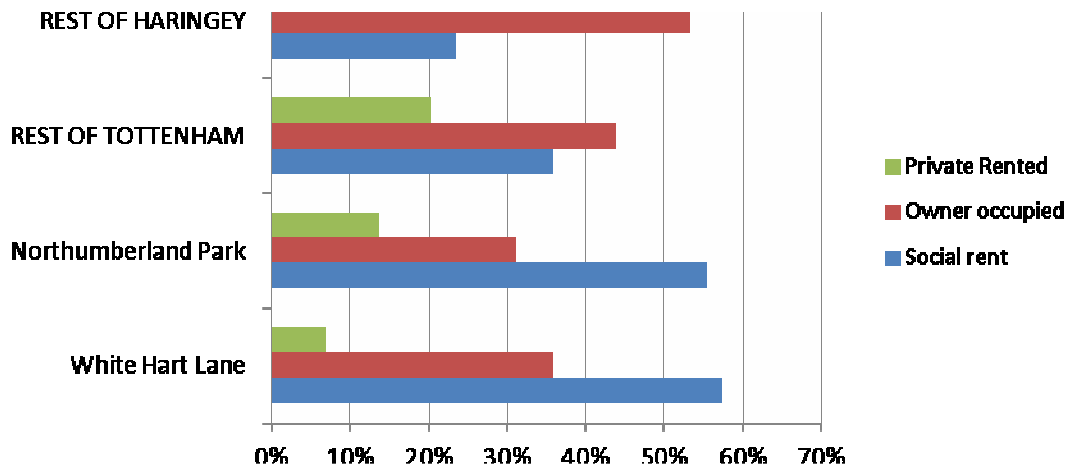


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Map 1: Distribution of Social Housing Units in Haringey (2011)

In 2001, the highest levels of social rented housing were in the White Hart Lane and Northumberland Park wards as set out below. But there is evidence of growth of private housing (and possibly HMO development) in this location.

	Social rent	Owner occupied	Private Rented	Total
White Hart Lane	2550	1591	309	4450
Northumberland Park	2710	1522	665	4897
REST OF TOTTENHAM	11809	14504	6737	33050
REST OF HARINGEY	10821	24623	10846	46290



Source: Census Data, 2001

Until the publication of the 2011 Census data, it is difficult to determine the degree to which the tenure mix in these wards has changed. However, there is evidence of growing private rented accommodation in these wards. However, the number of housing benefit claimants in each ward suggests there has been a substantial increase in private rented housing during the last decade:

- In 2001 there were 665 private rented homes in Northumberland Park; in 2011, Housing Benefit was being claimed by 1,139 private tenants
- In 2001, there were 309 private rented homes in White Hart Lane; in 2011, Housing Benefit was being claimed by 968 private tenants

This suggests even higher levels of private housing in this part of the borough as not everyone living in private rented accommodation will be receiving housing benefit. The enforcement action related to House Conversions and HMOs in these wards also suggest growing pockets of private rented accommodation in these wards.