

APPENDIX 1 – Schedule of Consultation Responses

Summary of Consultation Activity

The consultation for the HMO Article 4 Direction ran from 28 May to 30 August 2015. The consultation for Additional Licensing ran from 25 June to 23 October 2015. The consultations employed a range of methods to target as many stakeholders (such as residents, landlords, letting agencies) as possible. Consultation material for the Additional Licensing and the Article 4 Direction was separate but sign posted to the others consultation webpage.

A total of 66 responses were made by 13 respondents. The respondents included private landlords, residents affected by HMOs, resident amenity societies and industry bodies; the Residential Landlords Association and the National Landlords Association.

In order to reach relevant stakeholders for both the Additional Licensing and the Article 4 Direction the following approach was undertaken:

- A mail-out of more than 3,600 flyers addressed to landlords of HMOs/Suspected HMOs in Barnet advertising the Additional Licensing consultation which cross referenced the Article 4 Direction.
- Informing the Residential Landlords Association, the National Association of Estate Agents, the Association of Residential Letting Agents, the National Landlords Association (including meeting with their local representative) and the London Landlord Accreditation Scheme and UK Landlord Accreditation Partnership bodies, and encouraging them to contact their members via emails and newsletters to encourage their participation in the consultation.
- Press releases were placed in the Barnet Press at different stages of the consultation period. This has a combined readership of almost 100,000 people. Additionally there were also subsequent mentions on websites associated with landlords and letting agencies.
- The consultation was advertised on the Planning consultation webpage. There were almost 1,300 people visiting the webpage over the consultation period. The consultation was also advertised with other websites associated with Barnet as well as councils adjacent to Barnet.
- An advert was placed in Barnet First publicising the Additional Licensing and HMO Article 4 Direction consultation. Barnet First is distributed to over 135,000 households across the borough.
- The London Property Licencing website publicised the HMO Article 4 Direction consultation.
- Email campaigns with the official Middlesex University student accommodation service and the Middlesex University student union.
- Emailing more than 200 estate/letting/managing agents, and following-up with visits to their offices and personal meetings with staff in many cases and where possible.
- Emailing more than 2,500 businesses in Barnet.
- Emailing circa 700 contacts on the planning policy consultation database
- The publicity with regards Additional Licensing included link to an online consultation questionnaire and associated information on the consultation, support telephone number and email address through which respondents could ask questions about the consultation and request paper versions of the consultation questionnaire, including in languages other than English.

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1	Richard Morawetz	<p>I support the proposed implementation of HMO Article 4 in Barnet. An HMO adjacent to our own property demonstrated that the council has very little control over their quality. The property was purchased in April 2013 using an off-shore company</p> <ul style="list-style-type: none"> • The developer built a second story rear extension without authorisation, as shown in appendix 1. This was rented out for several months, so effectively the council was unable under current legislation to prevent the rental of a property that was built without authorisation. Eventually, after an appeal to the Planning Inspectorate was rejected, the second story extension was demolished, although the process took about a year. • The garden was generally not maintained (appendix 2) and the fence was left in a state of disrepair. • The property was initially advertised as 7 flats for up to 9 people (appendix 3), although the neighbours were informed that the council ultimately restricted the number of tenants to 5 people. • The flue was placed just above the front door; appendix 4 shows the flue emission being pumped out in front of the house. • When the first tenants moved in, doors were slamming in each room at all hours of the night, until the council finally requested that dampeners be placed on the doors. • Very soon after the first tenants moved in, mould appeared in our dining room wall, due to a bathroom with leaking pipes on the other side. We had to remove a section of the wall and wait for it to dry (appendix 5), which remains the case more than a year after the initial tenants moved in. <p>One would hope that any new legislation would give the council</p>	<p>We welcome this support. Confirmation of the Article 4 together with the Additional Licensing Scheme will help the Council to better manage HMOs within Barnet.</p>

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		greater authority to act on such situations or to prevent them altogether.	
2	Tom Dawson	The instigation of the Article 4 Direction is an unnecessary sledgehammer against small HMOs. By definition these are not major developments as they may only accommodate up to 6 individuals. Many of the suggested benefits of the Direction are not relevant as they are controlled under other legislation, or will not go away simply because HMOs are controlled. Additionally, some of the arguments made in support of the Article 4 Direction do not hold water. I believe that the proposal is ill-conceived and should be abandoned.	The Council considers that there are good planning reasons for ensuring that all HMOs are managed through the planning system. The Local Plan recognises the contribution of HMOs to housing supply and highlights their impact on the character and amenities of the surrounding area.
3	Tom Dawson	Poor standards of accommodation. This is not relevant as it is already controlled under other legislation	The Councils housing standards for HMO were approved at Housing Committee on 1 February 2016. Local Plan policy makes reference to the need to meet the relevant housing standards for HMO.
4	Tom Dawson	Loss of local character. The character of 'buildings' is already governed by planning legislation. The character of an 'area' may change through the introduction of HMOs but these properties are located in areas where there is a demand for them from single people who cannot afford larger houses. They should not be ignored – Provision of small HMOs should not be regulated as they serve a need for those residents of the borough who depend upon them for their accommodation. The London Borough of Barnet is not a museum – change will occur and if that is a change from the larger family houses which have little demand, to HMOs in some cases then that is progress.	The Article 4 is not a blanket ban on HMOs. Alongside considerations of character and impact on amenity the Local Plan recognises the contribution of HMOs to meeting housing need.
5	Tom Dawson	Reduction in environmental quality. It is difficult to see how the change from a single family house to an HMO can affect the quality of the environment. There is perhaps a degree of snobbery in this statement, or an attitude of 'Not in my back yard' Nimbyism.	There is a link between poorly managed HMOs and environmental quality with those landlords who do not maintain their properties, leaving tenants at risk and leading to nuisances which affect neighbouring premises. The Council seeks to address this through the Additional Licensing Scheme as a more enabling approach to assist landlords in providing a higher standard of accommodation.benefitting

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			the occupying tenants and wider local community.
6	Tom Dawson	Increased noise complaints. This is not relevant as it is controlled under separate legislation. Noise is often created by the young, but this is not dependent upon their being housed in HMOs.	Noise is an aspect of environmental quality and can create an impact so is a material consideration in planning decisions. The Council will seek to address anti-social behaviour through the Additional Licensing Scheme by requiring landlords to investigate complaints of anti-social behaviour as a condition of their licence and take reasonable steps to resolve the problem. Further guidance is being drafted for landlords and tenants that will explain what such reasonable steps might be.
7	Tom Dawson	Increased anti-social behaviour. This is not relevant as it is controlled under separate legislation. Anti-social behaviour is more associated with individuals and their behaviour than it is with the type of house that they live in. Anti-social behaviour will not go away just because an HMO is controlled, but rather through education and employment. Map 13 (Anti-social behaviour and noise complaints) shows that the incidence of these complaints is spread evenly across the borough and does not appear to be associated in particular with those areas where HMOs are known to exist.	Crime and anti-social behaviour are a key concern of local residents. The planning system plays an important part in making places safer and reducing the opportunity for crime and disorder. The Council will seek to address anti-social behaviour through the Additional Licensing Scheme by requiring landlords to investigate complaints of anti-social behaviour as a condition of their licence and take reasonable steps to resolve the problem. Further guidance is being drafted for landlords and tenants that will explain what such reasonable steps might be.
8	Tom Dawson	Loss of single family dwelling houses. There is a reducing demand for larger houses by single families. These are suitable for HMOs and should be allowed to change according to demand.	The Article 4 is not a blanket ban on HMOs and planning decisions will be based Local Plan policy which considers various factors including amenity impacts as well the need for HMO. A key ambition of the Local Plan is to ensure a variety of sizes of new homes to meet housing need. Maintaining and increasing the supply of family housing is a priority in Barnet and this commitment was reaffirmed by the Housing Strategy agreed by the Housing Committee on 19 October 2015.
9	Tom Dawson	Increased levels of crime. This is not relevant as it is controlled under separate legislation. The planning system should be used to help 'design out crime' through good design, but the planning system should not be used to try to design out those people who	As stated above the confirmation of the Article 4 together with the Additional Licensing Scheme will help the Council to better manage HMOs within Barnet and therefore help to address such issues as levels of crime. We consider that this can be done through a higher

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		wish to live in an HMO. The 'young and transient social groups' will not go away because there is no HMO. They will not change their habits simply because of an Article 4 Direction. You cannot expect crime to reduce simply by controlling HMOs. That is short-sighted and illogical. What is needed to reduce crime levels is an increase in the provision of jobs for the unemployed, as has been shown many times.	standard of accommodation.benefitting the occupying tenants and wider local community.
10	Tom Dawson	Increased pressures on car parking. Many single people who depend upon HMOs cannot afford a car. In areas near stations or on bus routes for example car parking is often less of an issue. Single people must live somewhere and an HMO is an affordable option. Car parking is a problem in many areas, with or without HMOs. Any increase in car numbers will be limited to those areas where HMOs are present as a high proportion of the total number of dwellings. This is reflected in other areas such as shopping streets and areas with larger numbers of flats for example. Car ownership and parking issues are a problem in many areas of the borough. Consider the number of streets with residents' bays or yellow lines, both of which make parking difficult for other users such as visitors and delivery drivers for example. In your document Appendix 1 Supporting the case for an Article 4 Direction it states that the 2011 census shows that 28.7% of households did not own a car or van. The proportion of HMO occupiers owning a van is likely to be very high as you can be certain that the more affluent homeowners each owned more than one car. This has been confirmed in the conclusions to the Appendix document. The argument for increased pressure on parking in the vicinity of HMOs is clearly flawed.	HMOs can contribute towards increased parking stress within an area. The supporting evidence clarified that known concentrations of HMO did not demonstrate clear parking stress across a Controlled Parking Zone although streets with high levels of parking permits could be identified. Both HMOs and housing are capable of housing a number of occupants who may own motor vehicles. This is an issue that should be considered through the planning process.
11	Tom Dawson	Dominance of private renting. There is an increase in the demand for private renting. The borough should not try to prevent individuals or families from renting. If the market demands private rented accommodation the borough must allow that to increase. It is not right for the planning system to attempt social engineering.	The Local Plan seeks to promote housing choice. The private rented sector forms part of that choice.
12	Tom Dawson	Changes to local retail provision. Retail will always follow the	There is a concern that the character of areas can change when local

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		market but cannot be tied specifically to HMOs. The numbers of HMOs are small when compared to the overall housing stock and are insignificant in the changes to retail activity. This is more closely tied to Internet shopping and changing shopping habits. A proliferation of small shops to serve the single people living in HMOs will not be a bad thing. It gives opportunity to small shop keepers who have had a difficult time with the increase in Supermarket power.	shops change. This can be associated with the effects of HMOs as much as it can be with the gentrification of an area.
13	Tom Dawson	increased pressure upon local services. The increased pressure comes from the additional number of people. However there is likely not to be an increase in schooling, or children's' services as most HMO users are single people without children. There may be an increase in certain services, but if not associated with HMOs these same pressures will appear elsewhere. The controlling of (and by inference reduction in) small HMOs will not result in the individuals requiring fewer services.	Services such as health and refuse collection in particular will be put under pressure from increases in the population. This pressure may be exacerbated by people living in substandard HMO accommodation.
14	Tom Dawson	The management issues. Those issues identified in association with HMOs and shown in your Fig 2 of the Supporting Case for Borough Wide Article 4 Direction might equally be found in privately rented flats and privately rented houses properties. To suggest that this is a reason for the Direction is to take the issue out of context with that in the wider borough.	Management issues are one of a number of factors that help build a convincing case for supporting the Article 4 Direction. The tenants of a HMO can potentially have a greater cumulative impact on a wider area than the occupants of other housing types, particularly where a concentration occurs. The Council is also working with landlords to address the issues in the private rented sector. This is highlighted in the Housing Strategy.
15	Tom Dawson	Litter related problems. It is noted that the litter complaints charted in your Map 7 are not as closely associated with HMOs as they are with town centres and busy streets. There are wide areas where there are no recognised HMOs and yet there is a severe littering problem. You will not control litter by controlling HMOs. The issue lies with the education of those who cause litter and their sense of pride in a location.	. The tenants of a HMO can potentially have a greater cumulative impact on a wider area than the occupants of other housing types, particularly where a concentration occurs. Litter again is one of a number of factors associated with the management of HMOs.
16	Tom Dawson	Complaints to planning. Of the 7500 complaints received relating to planning enforcement and HMOs a very small proportion (possibly 200) are shown on your Map 10 as related to HMOs.	Para 5.7 highlights the steadily rising number of complaints about HMOs and related issues. The types of development, both flat conversions and use of outbuildings are often associated with

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		This seems almost insignificant and does not require an Article 4 Direction to crack this small nut. Beds in Sheds and Studio / Flat conversions are not to be included in the total of complaints regarding HMOs. Further, the number of HMO complaints has dropped from 1/3rd of those complaints tabulated (Table 7) in 2010 to less than 1/4th of the total number of complaints recorded in 2014. Is the problem actually diminishing rather than getting worse?	potential HMO and indicate activity therefore we consider complaints about all three to be related to development of poor quality accommodation. The Article 4 is not a blanket ban on HMOs and planning decisions will be based Local Plan policy which considers various factors including amenity impacts as well the need for HMO.
17	Tom Dawson	Reduction in single family accommodation. There is an increase in demand for small units of accommodation. HMOs are one source of suitable accommodation for residents of Barnet Borough, alongside small flats and studios. This is reflected in the census figures showing a reduction of 3.4% of family accommodation since 2001. A reduction of less than a quarter of one percent per year. The control of HMOs through an Article 4 Direction will not help to fulfil the demand for an increase in the proportion of small units of accommodation for residents of the borough.	The Local Plan highlights that HMOs are an important source of low cost, private sector housing for students, those on low incomes and those seeking temporary accommodation. This will be a consideration when applying Policy DM09 to future applications for small C4 HMOs. A key ambition of the Local Plan is to ensure a variety of sizes of new homes to meet housing need.
18	Luke Winham	Further bureaucracy is unnecessary and unwelcome	There are landlords within Barnet who do not maintain their properties, leaving tenants at risk and leading to nuisances which affect neighbouring premises. It is on this basis that it is necessary to introduce both an Article 4 Direction and Additional Licensing in the borough. It provides the Council with a means to manage the supply and quality of HMOs. The Council is currently working on guidelines and provisions to streamline the licensing application and associated processes to ensure that the scheme is as straightforward as possible.
19	Luke Winham	Not necessary and private rented flats and houses can equally suffer the issues that HMO's suffer.	The Council is also working with landlords to address the issues in the private rented sector. This is highlighted in the Housing Strategy. The Council is currently working on guidelines and provisions to streamline the licensing application and associated processes to ensure that the scheme is as straightforward as possible.
20	Luke Winham	Freedom of choice will be restricted.	The Local Plan seeks to promote housing choice, this commitment was reaffirmed by the Housing Strategy agreed by the Housing

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			<p>Committee on 19 October 2015. Applying Local Plan Policy DM09 to future applications for small C4 HMOs can help it make a balanced planning decision which considers housing need as well as issues of impact on amenity and character.</p> <p>Through additional licensing the Council is encouraging improving standards for HMO.</p>
21	Luke Winham	More paperwork for everyone	<p>There are landlords within Barnet who do not maintain their properties, leaving tenants at risk and leading to nuisances which affect neighbouring premises. It is on this basis that it is necessary to introduce both an Article 4 Direction and Additional Licensing in the borough. It provides the Council with a means to manage the supply and quality of HMOs. The Council is currently working on guidelines and provisions to streamline the licensing application and associated processes to ensure that the scheme is as straightforward as possible.</p>
22	Mill Hill Preservation Society	We support your proposals since they will, in principle, necessitate developers wishing to adapt their properties for multiple occupation having to apply for planning permission, however large or small the proposed modification. However, we are not sure how far this can be taken in practice. For example, if a householder shifts or inserts a partition to create another room without applying for planning permission, will you ever be aware of this? What will be the mechanism for advising all the householders in the Borough that they are in an Article 4 Direction? Many householders in existing Article 4 Directions are not aware they are in one. What will be the penalties if a householder ignores the Article 4 Direction?	<p>We welcome this support. There are several definitions of HMO as set out in Appendix 1 of the supporting case for the Article 4 Direction. The planning definition relates to occupation of the property by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom.</p> <p>The method for advising householders that they are in an Article 4 Direction would be to place newspaper adverts in the Barnet Press for a period of time to make residents aware of this situation. The Article 4 will be noted against every residential property in the borough so a purchaser is made aware when a local search is carried out in London Borough Barnet.</p> <p>Small HMO which existed before the Article 4 comes into force on 29 May 2016 will be encouraged to seek a Certificate of Lawfulness whilst new small HMO developed after this date will require planning permission. Unlawful HMOs will be subject to enforcement action.</p>
23	Mill Hill Preservation	Recent relaxations in planning control have enabled householders to erect quite substantial buildings in their gardens, ostensibly as	The Council's Planning Enforcement team will investigate any suspected breaches of planning and will seek to rectify any unlawful

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	Society	summerhouses, studios, offices, etc., but which could be used as habitable accommodation. Will you have the resources to monitor whether this has already happened for existing outbuildings and whether it is likely to happen for proposed outbuildings?	development. Regarding the Additional Licensing scheme it is intended that the costs will be met from licence fee income and that the scheme will therefore be self-financing.
24	Mill Hill Preservation Society	We readily accept that multiple accommodation can present the social problems that your consultation document identifies, particularly overcrowding to an unacceptable level in the 21st century. However, we think more should be done to insist on developers providing a greater allocation of affordable housing when they undertake major redevelopments in areas such as Millbrook Park and Colindale. Mill Hill has given up an immense amount of land to development in recent years. We think that more should have been allocated to affordable housing.	The Council's policy on affordable housing is clearly set out in the Local Plan. The maximum reasonable amount is required on site subject to viability.
25	G. Pearson Estates	The proposal should not be borough wide, the council already know the problem areas and they have identified them in their survey reports. There is no reason whatsoever as to why the council cannot just introduce the scheme for specific areas.	There is potential for new HMO across the Borough. The Article 4 seeks to manage new C4 HMOs so a boroughwide approach is considered most appropriate.
26	G. Pearson Estates	The council have more than adequate grounds for enforcing breach of planning or non-compliance at the current stage but they do not however have the ability or the funds to enforce the current laws and regulations and a proposal to licensing will not make it any easier to enforce.	The Council's Housing Committee which approved the Additional Licensing Scheme 1 February 2016 highlighted the current fragmented approach to enforcement in relation to HMOs. Additional Licensing was sought instead of increased enforcement as a more enabling approach to assist landlords in providing a higher standard of accommodation and benefitting the occupying tenants and wider local community. The Council recognises that there may be additional burdens for the planning enforcement service following confirmation. However, the Article 4 Direction effectively reinstates the position that existed in the borough prior to 1st October 2010. The impact of the change arising from the Article 4 Direction will be monitored and subject to volumes a request for additional resources may be made.
27	G. Pearson	As usual there is no indication as to what the supposed cost is	The fees for additional licensing cannot be used for councils to make

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	Estates	going to be. No doubt the landlords will have no choice but to pass the cost on. No it will not be self-financing as the landlords will have to find the fees from somewhere and this appears yet again to be another money making scheme which the council appear to be wanting to impose.	profit, or be used towards anything other than the administration of the licensing scheme. The fee structure is not intended to be punitive. The Additional Licensing scheme costs will be met from licence fee income and the scheme will be self-financing. The Council has assessed the risk of rent increases due to the Additional Licensing scheme as being low and there has been no evidence from other boroughs with discretionary schemes that this has been the case. The Council will not require a fee for any planning application to convert a dwelling house into a small C4 HMO.
28	G. Pearson Estates	You will be well aware that a similar scheme in Enfield was rejected on the grounds that it should not be enforced across the whole borough.	The judgement made on Enfield's application for additional and selective licensing was considered to have not been lawfully consulted on.
29	G. Pearson Estates	This is another tear of bureaucracy - it is wholly unwarranted and unnecessary. The council already have powers of enforcement where complaints are made of overcrowding. The council appear at the current moment unwilling to enforce breaches of planning and building regulation approvals and yet are prepared to spend considerable sums of money in trying to implement a new scheme and yet appear incapable of enforcing the current laws and regulations.	The Additional Licensing scheme was sought as a more enabling approach to assist landlords in providing a higher standard of accommodation and benefitting the occupying tenants and wider local community. The Council is currently working on guidelines and provisions to streamline the licensing application and associated processes to ensure that the scheme is as straightforward as possible. Without the Article 4 Direction the Council is unable to manage small C4 HMOs which can be converted from single dwelling houses without the need for planning permission. The Article 4 Direction effectively reinstates the position that existed in the borough prior to 1st October 2010.
30	Sally Jacobs	I would like to place on record that this household strongly objects to houses meant for family homes being altered into bedsits. Having seen it in operation in this road where parking is a little difficult, although they have paved the whole front garden, adding once again to the flooding problem, there are four vans plus three cars to one house. I notice that extra bins have been allocated so how much extra Council Tax does this landlord (tenants) pay in relation to a "normal" household? The other worry is fire hazard.	The Additional Licensing scheme was sought as a more enabling approach to assist landlords in providing a higher standard of accommodation and benefitting the occupying tenants and wider local community. The purpose of the Article 4 Direction is to ensure that all proposals for new HMO are considered within planning.

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		With one staircase and rooms in the loft space as well as the other two floors where is the fire escape? Another factor is the more this is allowed to progress the surrounding properties will decrease in value. I have spoken to many other people in this area and they are of the same opinion, but of course, were not aware of the changes about to be made. Many, many times the word consultation is banded about which usually means the decision has been made! As for it helping to solve the housing crisis it will add to it when occupants of these rooms start a family and will demand to be rehoused. I sincerely believe the Council have not thought this through, but have their mind on extra revenue.	Where HMOs are required to have a licence under the Housing Act 2004, conditions generally require fire safety measures which protect the existing stairwell as the means of escape, except where other circumstances dictate that an alternative or secondary means of escape are necessary. In other situations, similar fire safety precautions for HMOs and other residential buildings can and in some instances must be dealt with, each case being dealt with according to risk. New work may require Building Regulation consent to provide fire safety precautions.
31	Historic England	We do not have any have substantial comments on the proposed Article 4 Direction. We note that the justification for the Direction to control HMOs includes reference to their impact on the character of streets, for instance, through the additional demand for parking. The storage of rubbish is another matter which can affect the quality of neighbourhoods. These are matters over which the Council will have control and will be able to manage appropriately as a result of the Article 4 Direction. In the case of refuse bins, it will be helpful to provide guidance for suitable storage solutions where HMOs are acceptable in principle.	The Council publishes guidance for architects and developers on the requirements for refuse and recycling facilities and is required for all scales of new residential development in the borough.
32	Historic England	It may be worth noting that in other ways the shared use of a house, as an alternative to formal sub-division into self-contained units, can be sympathetic to the character of the interior and avoid the proliferation of flues on the outside elevations. These matters are of particular importance where a building is listed.	Through applying Policy DM09 to future applications for small C4 HMOs the Council can consider impact on amenity and character. The Council will also use CS5 -Protecting and enhancing Barnet's character to create high quality places and DM01- Protecting Barnet's character and amenity to assess the impact of a HMO and to ensure that any HMO respects the character of an area and is not detrimental to the local amenity.
33	Residential Landlords Association	Using planning to tackle social problems is ineffective. The RLA is aware that in certain areas there has been concern as a result of the presence of small HMO accommodation. However, calling for the adoption of planning laws to deal with any problems is not the right approach. It remains the case that problems are caused not	Introducing an Article 4 Direction to manage HMOs through the planning system supports the implementation of an Additional Licensing Scheme as part of an effective borough-wide strategy to better regulate HMOs in Barnet.

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		by the material existence of HMOs but by the behaviour of tenants inside, and planning laws will not be able to reverse changes in areas. Rather, if there are problems then these should be dealt with by intensive area management and the better enforcement of existing legislation to combat anti-social behaviour and environmental concerns. This has been tried successfully and, importantly, it provides an immediate solution to local problems, where they exist. You clearly have in depth knowledge of where HMOs are in the Borough as demonstrated in your case for the Article 4 direction, so why not intensively focus resources in these areas as opposed to introduce a Borough wide scheme that restricts development rights? Or at least target one area and see how successful the scheme is before introducing the direction borough wide.	For example one part of Additional Licensing will seek to address anti-social behaviour through the Scheme by requiring landlords to investigate complaints of anti-social behaviour as a condition of their licence and take reasonable steps to resolve the problem. Further guidance is being drafted for landlords and tenants that will explain what such reasonable steps might be. Boroughwide Article 4 Directions for HMOs have been successfully implemented in a range of local planning authorities including Barking and Dagenham, Enfield, Newham and Waltham Forest
34	Residential Landlords Association	On street parking. Regarding the parking issues in Barnet, it is not necessarily the case that just because there are 5 – 6 individuals in a house, that they will have more cars per household than a family. Particularly those who will be struggling to pay the prices of rent in the Capital, a car may be a luxury that not all can afford. Therefore wouldn't it be more sensible to assess this in areas where this problem is most prevalent as opposed to Borough wide planning restrictions?	HMOs can contribute towards increased parking stress within an area. The supporting evidence clarified that known concentrations of HMO did not demonstrate clear parking stress across a Controlled Parking Zone although streets with high levels of parking permits could be identified. Both HMOs and housing are capable of housing a number of occupants who may own motor vehicles. This is an issue that should be considered through the planning process.
35	Residential Landlords Association	Monitoring. There is no suggestion of any kind of effective monitoring for the success or otherwise of the proposed scheme. Should LB of Barnet Council proceed with these new planning restrictions there needs to be put in place a monitoring regime; agreeing with stakeholders the various measures which will indicate whether or not the desired outcomes for communities are achieved.	The Article 4 Direction will be monitored to measure its impact on HMOs. Results will be highlighted in the Authorities Monitoring Report
36	Residential Landlords Association	Outcomes. You do not specify with any detail what the desired outcomes of the proposed planning restrictions are. No targets or objectives are set other than vague references to how a less concentrated area of HMOs will result in more stable communities.	The outcomes for new HMO are clearly set out in Policy DM09.

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		If anything, a proposal of this kind stigmatises the area concerned. There is no suggestion that there are any particular problems of overcrowding so how can one see any result from this? As to requiring the upgrading of properties, this can be dealt with by a programme of inspections and the use of HHSRS powers.	
37	Residential Landlords Association	Maintaining 'sustainable neighbourhoods' One of the arguments for restricting the number of HMOs in Wards / Boroughs is the very general assumption that HMOs cause a loss of community due to the transient nature of some residents, which is a dated and inaccurate opinion. The fact is that populations have shifted and demographics have changed - a fact poorly reflected by the current Use Classes. In many areas where there is a concentration of HMOs, landlords are making intensive use of the existing stock in places where it might be otherwise underutilised and poorly maintained. HMOs also provide a vital service to the economies of many of our towns and cities. This kind of accommodation is key to the mobility of the workforce, especially young workers. HMOs are not just occupied by students, but with rising rents and difficulties with getting a mortgage, are increasingly required by professional working people.	An Article 4 Direction will help manage the growth of small HMOs therefore mitigating their impact on local amenity and improving the quality of such accommodation as well as their surrounding neighbourhood. Residents of HMOs are attracted by access to public transport and local services as well as affordable accommodation. They provide a convenient means of securing accommodation for students, people on housing waiting lists and others seeking temporary accommodation as well of those on low incomes.
38	Residential Landlords Association	The impact on the Under 35s access to shared housing. Local authorities are under a duty to meet demand for housing. A key issue that you rightly address in your supporting case is the increase in demand from the Under 35 age group who need access to shared housing because: they choose to; of the benefit cap and extension of the Shared Accommodation Rate from 25 – 35; they are priced out of buying a home; or, they are still on a social housing waiting list. We suspect that these issues are prominent in the London borough of Barnet as they are symptomatic of such high demand and lack of supply of housing in capital at the moment. A recent APPG (All Party Parliamentary Group) on the PRS, report recommended that Local Authorities should be allowed to use "flipping". Flipping would mean once a	In order to manage small HMOs (C4) the Article 4 Direction has been introduced for planning to consider issues including impact on amenity and character that arise from the development. Allowing HMOs to flip between uses ie convert from C4 to C3 Dwelling House and back again without recourse to planning is the opposite of what the Council is trying to achieve with this Direction.

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		landlord had received permission for a building to be used as a HMO it would be in force indefinitely enabling them to flip the use of the property from HMO to family use and back to HMO again, if they so wish. This would avoid the situation faced in some areas whereby HMOs remain empty because landlords do not want to have to go through the planning application process if they decide to let the property to a family.	
39	Residential Landlords Association	It also suggested that legislation designed to tackle anti-social behaviour is properly enforced, rather than simply reaching for planning powers to start with. We feel that where occupants of shared housing cause repeated trouble and fail to respond to warnings about their behaviour, universities, students unions, landlords and the local police should ensure that robust action is taken against such tenants, with a much swifter process to evict them where need be. (Full report Appendix 1)	<p>Crime and anti-social behaviour are a key concern of local residents. The planning system plays an important part in making places safer and reducing the opportunity for crime and disorder.</p> <p>The Council will seek to address anti-social behaviour through the Additional Licensing Scheme by requiring landlords to investigate complaints of anti-social behaviour as a condition of their licence and take reasonable steps to resolve the problem. Further guidance is being drafted for landlords and tenants that will explain what such reasonable steps might be.</p>
40	Residential Landlords Association	The cost. With the current cutbacks facing local authorities is this something which a local planning authority should be embarking on at all? You make no mention of cost in your supporting documents. This leaves many questions such as will LB of Barnet have the resources to implement a full Borough wide scheme and deal with the consequent planning applications? How will this cost be met? Shouldn't local resources be better utilised, for example to actually deal with problems as they arise with better tenant education on refuse collection and more effective enforcement, for example ? This could include better enforcement of the complaints that you mention in your Case for HMOs without permission. There is the argument that those Landlords who just 'flip' the use of dwellings without consent already, will just continue to do so unless there is effective enforcement and proactive inspections to see that HMOs have sought the necessary permissions.	<p>Boroughwide Article 4 Directions for HMOs have been successfully implemented in a range of local planning authorities including Barking and Dagenham, Enfield, Newham and Waltham Forest.</p> <p>The Council recognises that there may be additional burdens for the planning enforcement service following confirmation. However, the Article 4 Direction effectively reinstates the position that existed in the borough prior to 1st October 2010. The impact of the change arising from the Article 4 Direction will be monitored and subject to volumes a request for additional resources may be made</p> <p>The Additional Licensing Scheme approved by Housing Committee in February 2016 sets out how licensing fees will finance implementation, it is intended that the costs will be met from licence fee income and that the scheme will therefore be self-financing. The fees for licensing cannot be used for councils to make profit, or be used towards</p>

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41	Residential Landlords Association	<p>Local plans If an Article 4 Direction is made, local plans will have to say where smaller HMOs are encouraged, if they are to be banned or restricted in certain areas. To meet need, other areas will have to be designated to encourage small HMOs instead. Local Authorities cannot duck this obligation to say where else in their areas the need for shared accommodation is to be met. There is no reference to any alternative sites for HMOs in Barnet. This will also be almost impossible for you to do seeing as you have proposed a direction in the whole of the borough. How quickly planning applications can be turned around will depend on resources and as such could lead to a backlog of people waiting for shared housing provision when demand is currently so high. The resulting lack of supply of shared housing in Barnet as a result of the proposed directions and the problems that this would cause, including an increase in risking homelessness, would be totally disproportionate to the kind of issues referred to in the Consultation.</p>	<p>anything other than the administration of the licensing scheme.</p> <p>In reviewing the Local Plan the Council will be informed by evidence on the housing market area in particular the Strategic Housing Market Assessment (SHMA). This evidence will inform the direction of the Local Plan with regard to addressing housing needs.</p>
42	Residential Landlords Association	<p>The RLA reiterates its objection to the proposed scheme. We strongly believe that in the first instance, before even contemplating removing development rights, the Council should look for a more imaginative solution. What is really needed, as mentioned previously, is some improved area management for the problems that you at the moment are merely anticipating. Once you have established where the problem is through effective local data, street by street property inspections can be carried out. HHSRS powers can be used to effect improvements, if voluntary co-operation will not work. Rather than implementing Article 4 Direction, time would be far better spent "out on the street" looking at properties and making sure that any that are needed are brought up to standard. Landlord accreditation can also be used to ensure that HMO management is of a high standard. These and other measures have an immediate impact and address the current position whereas the Article 4 direction may only prevent new</p>	<p>The Council considers that a boroughwide Article 4 Direction combined with an Additional Licensing Scheme is the right approach for Barnet. Such Directions have been successfully implemented in a range of local planning authorities including Barking and Dagenham, Enfield, Newham and Waltham Forest. We will monitor the impact of the Article 4 Direction in terms of planning applications for C4 HMOs and planning enforcement complaints</p> <p>Whilst the Council appreciates the value of landlord accreditation and the higher standards of management that these encourage, we believe it is not a substitute for licensing and notes that these are voluntary schemes which are likely only to attract the better landlords and agents to membership. That said we see that licensing and accreditation in tandem is important and we will continue to support and encourage membership of the London Landlords Accreditation Scheme (LLAS) and other similar schemes.</p>

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		HMOs (and even this is questionable). Again, if these planning restrictions are to go ahead we would recommend that Local Authorities like LB of Barnet should be allowed to use "flipping", if demand changed in the Borough and more HMO accommodation is needed. As we explain earlier in this document this would avoid the situation faced in some areas whereby HMOs remain empty because landlords do not want to have to go through the planning application process again if they decide to let the property to a family.	
43	Residential Landlords Association	Appendix 1 In October 2014, the APPG on the PRS chaired by the RLA and Oliver Colville MP, published its report 'Access to private rented housing for the under 35s' which looks at implications of Article 4 directions on the supply of private rented shared housing for this age group. You can read the full report here - http://rla.org.uk/policyhub/wp-content/uploads/2014/10/PRS-access-for-U35s_Full-Written-Evidence_Oct.14.pdf	As stated above the review of the Local Plan will be informed by the SHMA. This evidence will improve our understanding of the role of the private rented sector in addressing housing needs in Barnet, including housing younger people.
44	New Barnet Community Association	I am writing on behalf of NBCA to support the proposals set out in your consultation documents.	The Council welcomes this support
45	New Barnet Community Association	We are seeing, and suffering from, more use of family dwellings as HMOs including premises previous thought to be too small but such as the rewards no of overcrowding a house even the smallest houses are being misused. There are too few bins so rubbish is either fly tipped, put into neighbour's bins at night or dumped. Gardens and forecourts are neglected and the property becomes run down. Builders are not seen modifying the premises so they are unlikely to comply with legislation thus increasing Fire and Health hazards to the occupiers and neighbours. We have had one doss house burnt out in Victoria Road over the past six months. The sooner some control is exercised over these properties the better.	By ensuring that all new HMOs will require planning permission together with the Additional Licensing Scheme the Council will have more powers to manage HMOs in Barnet. In February 2016 the Housing Committee approved new standards for HMOs as part the Additional Licensing Scheme.
46	National	The National Landlords Association (NLA) exists to protect and	The Council is not in the process of producing a stock condition

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	Landlords Association	<p>promote the interests of private residential landlords. With more than 60,000 individual landlords from around the United Kingdom and over 100 Local Authority associates, we provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector. The NLA seeks 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. The ability to introduce additional licensing is a powerful tool. If used correctly by Barnet Council it can resolve specific issues. The NLA has supported many local authorities with the introduction of a proportional licensing scheme, as it will benefit landlords, tenants and communities. In the Government procedural document - 'Approval steps for Additional and Selective Licensing Designation in England', it states that in order to apply for Licensing a local housing authority "will have to show how such a designation will be part of the overall strategic borough wide approach, and how it fits with existing policies on Homelessness, Empty homes, Regeneration and Anti-social behaviour." As the council is in the process of producing a stock condition survey, why has the council produced a consultation before a report has delivered its findings? Your consultation document also does not point out how it would fit in with the strategies.</p>	<p>survey.</p> <p>The strategic matters were outlined in our FAQ 18 „How does the proposed Additional Licensing Scheme fit in with the Council's Housing Strategy? And FAQ 19 „What else is the Council doing in its overall approach to problems in the private rented sector (PRS)?"</p> <p>The proposed Additional Licensing Scheme is an integral part of the Council's Housing Strategy 2015-2025 and an element of one of our key priorities in sustaining quality, particularly in the private rented sector. Alongside an intention to implement an Article 4 Direction which withdraws permitted development rights which allow the conversion of dwelling houses to small HMOs without planning permission, Additional Licensing has been looked at as part of a review into the way in which HMOs are regulated within the borough. This complements the other key priorities the Strategy contains including: increasing the housing supply; delivering homes that people can afford; preventing and tackling homelessness; providing suitable housing to support vulnerable people; and, delivering efficient and effective services to residents.</p> <p>The Strategy considers how Barnet's future housing needs will be met. Barnet's Housing Needs Assessment (HNA) indicates that the borough has a potential need for an additional 27,000 dwellings over this period. The majority of Barnet's growth will be focused on Brent Cross/Cricklewood, Colindale, and Mill Hill East, where there is capacity to deliver 20,000 new homes by 2029. The development of Brent Cross/Cricklewood will deliver 7,500 new homes over the next 20 years. Colindale will make the largest housing contribution to the borough over the next 10 years, with approximately 10,000 new homes, and the regeneration of Mill Hill East will provide more than 2,000 new homes over the next 15 years. The Council's largest estates in Grahame Park, West Hendon, Stonegrove/Spur Road and Dollis Valley are being regenerated. Dilapidated, poor quality housing</p>

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			<p>is being replaced with modern, high-quality mixed-tenure accommodation. The regeneration of Barnet's biggest estates will see 3,000 existing council dwellings replaced with 7,000 mixed tenure homes.</p> <p>The strategy also sets out the Council's ambition to build new affordable homes on council housing land. This programme is already underway, the first new council houses in Barnet for over 20 years were completed in March 2014 and 40 more are currently on site. The Council is also progressing plans to provide hundreds of new mixed tenure homes on its own non-housing land and other public sector sites, which will be funded through the sale of market housing.</p> <p>The Council has identified 60 sites which have the potential to deliver hundreds of new homes on its own land over the next decade. This will focus on building new affordable homes for rent on existing pockets of council housing land, mixed tenure homes on other sites, and a range of other projects including new extra care housing for older people and starter homes for ownership...</p> <p>This response continues further in section 4 of the 'Councils Response to Consultation Comments' on the Additional Licensing consultation webpage on the Barnet engage consultation portal: https://engage.barnet.gov.uk/ The response was considered and responded to as part of the consultation on the Additional Licensing Scheme which was approved by the Housing Committee in February 2016.</p>
47	National Landlords Association	One of the dangers of the proposed additional licensing scheme could be the costs are passed through to tenants, thus increasing cost for those who rent in an area, along with the cost of the council. Thus increasing costs to Barnet residents especially the most vulnerable.	<p>There is no evidence from other boroughs with discretionary schemes, that this has been the case. It has been suggested in research carried out for the London Borough of Camden by the LSE that many landlords set rents with reference to the local market and not their outgoings. In our Report into the potential internal and cross boundary</p>

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			effects of a proposed Additional Licensing Scheme for houses in multiple occupation in Barnet", we have assessed the risk of rent increases due to the scheme as being low. This is contained in Appendix 5 of the Housing Committee report.
48	National Landlords Association	In many places such as Newham, Oxford and Bath where they introduced in addition to the additional licensing an article 4 direction, it has restricted the number of shared housing that is available. This has resulted in the council looking to house many local people outside the council's boundary. This policy could also have an impact on house prices in the area, those with permitted development rights having a premium. this has been seen in other areas	<p>. The experience of other local planning authorities who have implemented Article 4 Directions and Additional Licencing on HMOs is that there has been no significant effect upon the supply of shared housing following confirmation. The Council is not aware of any evidence that the introduction of such mechanisms have singly led to price increases in a rising market among other inflationary factors. The introduction of an Article 4 Direction does not mean that once having applied for permission, an application to convert a house to a HMO will be refused as a matter of policy. It is also worth noting that no fees will be charged for making a planning application under the Direction.In relation to additional licensing in particular, the various risks have been considered in a „Report into the potential internal and cross boundary effects of a proposed additional licensing scheme for Houses in Multiple Occupation (HMOs) in Barnet". This can be found in Appendix 5 to the Housing Committee report.</p> <p>We will be monitoring the impact of the Article 4 Direction and commissioning new housing evidence to support the review of the Local Plan</p>
49	National Landlords Association	Areas that have seen the introduction of additional licensing have seen mortgages withdrawn, (Nat West and RBS). This could have an impact on the housing market. This could increase the cost to tenants and the council in the areas that it is introduced. What analysis has been undertaken of this and potential change to the market?	The Council are not aware of any specific cases of this kind although we would advise landlords to check the terms of their mortgages to see if there are any restrictions. If in doubt, they should contact their lender for further advice.
50		The increase in the activity will increase the demand on the council, what provision has the council made and how much additional resources has the council allocated i.e. staff answering phones, enquires, lack of property, etc.?	The financial details for the scheme can be found in the Housing Committee report.

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51		<p>The council should consider alternative schemes such as the Home Safe scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives which the council has not reviewed. This is a management of the landlords and tenants, thus management of the whole situation which would be a more appropriate outcome. This would also save the council money.</p>	<p>Whilst the Council appreciates the value of schemes such as Home Safe and SEAL and the higher standards of management that these encourage, it does not see them as being a substitute for licensing and notes that these are voluntary landlord/agent accreditation/self-regulation schemes which are likely only to attract the better landlords and agents to membership. In Doncaster the Home Safe Scheme is an aid to compliance and is run alongside an area based selective licensing scheme. The Council encourages membership of the London Landlords Accreditation Scheme. Currently, there are 522 landlords accredited with the LLAS in the borough.</p>
52	National Landlords Association	<p>In addition to young professionals and students, migrants make up an important part of the shared housing market in Barnet. For obvious economic reasons and for flexibility, shared housing is an important source of housing for these groups. However, demand is not static. Thus the impact of these policies will have an impact on the lower economic groups within Barnet. What measures are the council taking to mitigate these issues which includes increases in housing costs.</p>	<p>The Council agrees that HMOs are an important source of housing for certain groups. We consider that there will be minimal impact on housing costs associated with Additional Licensing in Barnet but will monitor the situation.</p> <p>The confirmation of the Article 4 Direction effectively reinstates the position that existed in the borough prior to 1st October 2010. It does not stop planning applications for new small or large HMOs. Applications for small HMOs will not require a planning fee.</p>
53	National Landlords Association	<p>The impact of schemes such additional licensing with article 4 directions have put houses that are shared at a premium, which has added value to them staying shared. The Council's policy will prevent new entries into the market, thus creating a monopoly. Thus properties that have shared usage will have higher value than those that do not. Landlords will not be inclined to return them to family use, as they have higher value in shared usage and will wish to preserve that status.</p>	<p>A licence granted under an Additional Licensing Scheme is unlikely to add any special value to an HMO that would specifically lead to the type of inertia described and the Council cannot see how its introduction will prevent new HMO entries where there is market for them. Our experience with mandatory HMO licensing is that houses fall into and out of the present licensing regime constantly, often changing from one type of residential occupation to another for reasons unconnected with licensing and the introduction of a wider licensing framework is not expected to change this. Please also see our response to representation 46 above.</p>
54	National Landlords Association	<p>The use of additional licensing which is landlord/property based, will not resolve many of the issues which are caused by tenants – they are tenant based issues. Landlords have limited powers in addressing these as any direct action by the landlord to address issues such as ASB can be stated as being harassment by the</p>	<p>Whilst we appreciate that licensing will not necessarily make tenants better behaved, the Council regards it to be important that the landlords act reasonably to deal with any tenant anti-social behaviour within the licensing framework. The proposed condition concerning this requires no more than to investigate complaints of ASB and to</p>

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		tenant.	take reasonable steps to resolve the problem and demonstrate that they have procedures in place to accommodate this as part of their management practice. We are drafting guidance to both landlords and tenants about what such reasonable steps might be with examples and to ensure that all parties will know what is expected of them.
55	National Landlords Association	The NLA believes that any regulation of the private rented sector needs to be balanced. Additional regulatory burdens must focus on increasing the professionalism of landlords, the quality of private rented stock and driving out the criminal landlords – who blight the sector. It should be the shared objectives of all parties involved to facilitate the best possible outcomes for landlords and tenants and as such good practice should be recognised and encouraged in addition to the required focus on enforcement activity. In light of the current economic climate. The last thing good landlords need is regulations or licensing schemes; particularly where there appears to be limited direct and immediate benefit to landlords or tenants. This is evidenced by the schemes that have been introduced elsewhere.	The Council believes that Additional Licensing will increase the focus on professionalising landlords helping to drive up standards, whilst at the same time ensuring that the basic health and safety standards set out in licence conditions are effectively communicated and enforced. The rigorous enforcement regime, which is an integral part of the proposed licensing framework, will serve to make rogue landlords more identifiable and therefore more easily targeted. Further and better data is being and will continue to be gathered and we will encourage and share intelligence about HMOs and their landlords with our partners and other stakeholders. If introduced, we will also promote the scheme widely with the public and provide advice about how they can contact us about properties of concern to them. The resultant shift in emphasis will be towards landlords being more aware of and fulfilling their responsibilities through the operation of the scheme. At the same time, bad landlords or those who are not fit and proper persons will be forced to leave the sector. The Council does not intend good landlords to be the focus of its attention. The Council is not aware of any substantial evidence that licensing regimes do not work. Please also see our response to representation 57 below.
56	National Landlords Association	The changes will make it advantageous for landlords to hold on to a shared house rather than let it go back into family use. This policy as has been seen in other parts of the country will see crystallisation of shared housing and a block on new shared housing. This will increase the cost of those renting shared housing, as you will be stopping new entries into the market and those with shared housing will be hesitant to return a shared house	Please see our response to representation 52 above. The confirmation of the Article 4 Direction effectively reinstates the position that existed in the borough prior to 1st October 2010. It does not stop planning applications for new small or large HMOs. Applications for small HMOs will not require a planning fee.

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		to family use as they will not get conversation back.	
57	National Landlords Association	The introduction of additional licensing will require resources to be allocated to the area it to work i.e. tenant information officers, landlord liaison officers, anti-social behaviour staff, community workers and enforcement staff. This will create added cost to Barnet Council which cannot be met through licensing fees. The NLA would be willing to work with the council with the provision of Tenant Information Packs, Assured Short Hold Tenancies, and support services for landlords to improve the efficiency of the homes in the area. But this would need to be complemented by resources by the council to tackle the issues the council has highlighted.	It is intended that the costs of the scheme will be met from licence fee income and that the scheme will therefore be self-financing
58	National Landlords Association	The changes to welfare allowances, how much resource has the council allocated to help vulnerable residents with increased costs due to these policies? Not only with the costs of the licence but also the increase in rent?	Whilst the Council believes that there is only a low risk of increases in rents generally resulting from Additional Licensing if introduced in Barnet, we will monitor the situation during the course of the scheme as part of ongoing evaluation and take this into account in assessing the performance of the scheme and any impact it may have.
59	National Landlords Association	Clarification on the council's policy, in relation to helping landlords when a section 21 notice is served is required, with the proposed additional licensing scheme? It would be useful if the council could put in place a guidance document which would outline the council's position in helping landlords remove tenants who are causing anti-social behaviour. The NLA would like further explanation on how the council will work with landlords to mitigate the tenants that leave a property early but where they still have a tenancy, thus the tenant is liable for council tax but the property is empty? If a landlord has problems with a tenant, how will the council help the landlord?	The Council will always work with landlords to try to resolve any problems they have and give advice provided it is within their remit. The Council is drafting guidance to both landlords and tenants about what „reasonable steps“ might be in relation to dealing with anti-social behaviour as well as other matters. Exemptions to council tax apply in certain limited circumstances and do change from time to time. Further and up-to-date information can be found here
60	National Landlords Association	The ability for a landlord to enforce the law against the tenant that is causing anti-social behaviour is through the civil court where the burden of evidence is different to that of a criminal court. Although	The Council is aware that possession proceedings can take some considerable time although the point made assumes that the tenant will deliver up the accommodation at the end of the tenancy. Where

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		this is lower, the length of this process will often exceed the period of the tenancy. Why will a landlord continue to prosecute a person who is no longer a tenant? A landlord also risks the tenant causing damage to their property if they start legal proceedings against the tenant. Equally if a landlord has started a process, this will not appear on any council document, thus how will the council expect to measure this?	this is not the case, proceedings are inevitable where the landlord wants to recover possession. In addition proceedings can be taken for waste involving wilful damage in addition to lawful treatment of the tenant's deposit in such situations. Where the landlord has begun the process of possession, there will be a trail of relevant associated documents and suitable copies of such documents will be accepted by the Council as evidence or part of the evidence showing that anti-social behaviour matters are being dealt with appropriately.
61	National Landlords Association	The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not use their powers to manage their properties effectively. A more appropriate response would be to identify issues and assist landlords to develop the required knowledge and skills to improve the sector through schemes such as the NLA Accredited Landlord Scheme. This can allow Barnet Council to target the criminal Landlords – a joint approach is required.	Whilst the Council appreciates the value of landlord accreditation and the higher standards of management that these encourage, we believe it is not a substitute for licensing and notes that these are voluntary schemes which are likely only to attract the better landlords and agents to membership. That said we see that licensing and accreditation in tandem is important and we will continue to support and encourage membership of the London Landlords Accreditation Scheme (LLAS) and other similar schemes as well as to continue to assist and support landlords with any questions they have and give advice where we can.
62	National Landlords Association	There does not appear to be any evidence of research into the impacts of this policy on property prices or lack of property being available. In other parts of the country where this policy has been introduced we have seen people being frozen out of the housing market and rental prices increasing, while creating a monopoly.	There is no evidence from other boroughs with discretionary schemes, that this has been the case. It has been suggested in research carried out for the London Borough of Camden by the LSE that many landlords set rents with reference to the local market and not their outgoings. In our Report into the potential internal and cross boundary effects of a proposed Additional Licensing Scheme for houses in multiple occupation in Barnet", we have assessed the risk of rent increases due to the scheme as being low. This is contained in Appendix 5 to the Housing Committee report. We are not aware of any research or reliable evidence of any significant effect upon the supply of shared housing brought about by Additional Licensing, Article 4 directions or indeed a combination of both. Neither are we aware of any evidence that the introduction these devices have been singled out as having led to price increases in a

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			<p>rising market among other inflationary factors. The introduction of an Article 4 Direction does not mean that once having applied for permission, an application to convert a house to a house in multiple occupation will be refused as a matter of policy. It is also worth noting that no fees will be charged for making a planning application under the Direction.</p>
63	National Landlords Association	<p>The risk of introducing additional licencing on the number of shared housing is likely to increase the costs for those who rent, as it prevents new entries into the market. Thus a more erudite approach to dealing with nuisance and a separate policy to tackle the criminal landlords would be more applicable in resolving the issues. Enforcement against those landlords that do not meet housing standards is required. This policy will increase the costs of the council.</p>	<p>Being a licence holder is a signal to tenants that a potential home will meet minimum safety standards. One of the scheme's objectives is to provide a reasonable, simple and unambiguous set of basic health and safety standards and to create clear expectations of what is required between all the parties (landlords, tenants and the Council). The implementation of a rigorous enforcement policy is essential to the success of the proposed scheme along with continuous evaluation and development of the inspection programme, licensing processes and measures of the scheme's success. Rogue landlords will be more identifiable and therefore more easily targeted within this licensing framework. The Council does not intend good landlords to be the focus of its attention.</p> <p>There is no evidence from other boroughs with discretionary schemes, that this has been the case. It has been suggested in research carried out for the London Borough of Camden by the LSE that many landlords set rents with reference to the local market and not their outgoings. In our Report into the potential internal and cross boundary effects of a proposed Additional Licensing Scheme for houses in multiple occupation in Barnet", we have assessed the risk of rent increases due to the scheme as being low. This is contained in Appendix 5 to the housing committee report.</p> <p>We are not aware of any research or reliable evidence of any significant effect upon the supply of shared housing brought about by Additional Licensing, Article 4 directions or indeed a combination of both. Neither are we aware of any evidence that the introduction these</p>

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			<p>devices have been singled out as having led to price increases in a rising market among other inflationary factors. The introduction of an Article 4 Direction does not mean that once having applied for permission, an application to convert a house to a house in multiple occupation will be refused as a matter of policy. It is also worth noting that no fees will be charged for making a planning application under the Direction.</p> <p>In relation to additional licensing in particular, the various risks have been considered in a „Report into the potential internal and cross boundary effects of a proposed additional licensing scheme for Houses in Multiple Occupation (HMOs) in Barnet”. This can be found in Appendix 5 to the housing committee report.</p>
64	National Landlords Association	The root cause of housing demand is a lack of housing and there needs to be more houses built, demand is outstripping supply in Barnet.	We appreciate the difficulties associated with the housing market in Barnet and indeed the rest of London. These are addressed by the Council's Housing Strategy 2015-2025. Please also see our response to representation 46 above.
65	Catherine Davies	<p>I chose the house in we live in because it is in a conservation area, which was made up of single family dwellings. I thought it would be a great place to bring up my family.</p> <p>I thought that the idea of a conservation area was to protect the character of it. Unfortunately the house next door (33) was sold to a woman who doesn't live there. Instead she has rented it out to individuals (more than 6) and there does not seem to be anything that we can do about it. All of those tenants have moved out now and so she is re letting it again. I have just found out that apparently the owner is allowed to have 6 unrelated tenants as it is classed as a small HMO. I don't understand this as I thought that if a property has 3 floors then there should not be more than 5 unrelated people in there without an HMO licence. The problem with this is that the house only has 4 bedrooms so this means that all rooms are let including the front sitting room. When the previous tenants lived there, there were 2 beds in the sitting room and the</p>	By ensuring that all new HMOs will require planning permission together with the Additional Licensing Scheme the Council will have more powers to manage HMOs in Barnet.

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		<p>blinds were closed most of the time. The tenants left cigarette butts on the pavement in front of their house and ours. There was litter and smashed bottles. Some of the tenants had friends who urinated in the bushes opposite our house. There was so much footfall in the hall which disturbed us as they came in and out at all times of the day and night and would slam the front door. All of these things change the character of our once lovely conservation area. It is breaking up our community because these tenants don't care about our community. We would take parcels for them if they weren't in but they wouldn't even answer their door. They hid behind locked doors and closed blinds. That is not a community is it? We are used to having neighbours here who we get to know and help but by allowing these houses to be let out as HMO's it will destroy this neighbourhood. There are more and more HMO's creeping into the Terraces and I have noticed a decline in the look of the street. This really saddens me and makes me feel that I need to move. If you have read this, I thank you for reading and hope you consider my views.</p>	
66	Francine Harper	<p>I am the neighbour on the other side of Gratton and we have had horrible noise problems from number 33. Late night noise and in the summer our garden was unusable. We managed to speak to the tenants and came to some agreement which helped but now they are gone and we don't know who will move in next. Our lives are being ruined here by these HMO's – please do something about them.</p>	<p>We welcome this support. Confirmation of the Article 4 together with the Additional Licensing Scheme will help the Council to better manage HMOs within Barnet</p>
67	Thor Portess and Bob Parker	<p>I would just like to clarify that no action is required with regard to "Established Use" C4 following your Council's implementation of the above Article 4. May I ask you to confirm for the records that no action is required in respect of a property consisting of 5 bedsits on 2 floors bathroom/toilet separate toilet shared kitchen at 6 Ossulton Place N2 0SB which has been in use C4 since March 2013.</p>	<p>The Council's advice is that in principle the use would be lawful. For formal confirmation of established C4 HMOs it is recommended that an application for a Certificate of Lawfulness is submitted.</p>

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