

Item No. 8.	Classification: Open	Date: 8 October 2013	Meeting Name: Planning Committee
Report title:		Public consultation on making a non-immediate Article 4 Direction to withdraw the permitted development rights granted by Schedule 2, Part 3, Class I of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) on Henshaw Street, SE17, East Walworth	
Ward(s) or groups affected:		All	
From:		Director of Planning	

RECOMMENDATIONS

That the planning committee:

1. Approves public consultation on making a non-immediate Article 4 Direction (Appendix A) to remove permitted development rights granted by Schedule 2, Part 3, Class I of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) which allows a change of use from a dwellinghouse (use class C3) to a house in multiple occupation (use class C4) and vice versa on Henshaw Street, SE17 (Appendix B).
2. Note the equalities analysis of the proposed Article 4 Direction (Appendix D).

BACKGROUND INFORMATION

Legislation

3. On 1 October 2010 changes were made to the Town and Country Planning (General Permitted Development) Order 1995 (as amended) which granted a permitted development right allowing a change of use from use class C3 (dwellinghouse) to use class C4 (houses in multiple occupation) without the need for a planning application. The Government's broad definition of the C4 Use Class is 'small shared houses or flats occupied by between three and six unrelated individuals who share basic amenities' (Circular 08/2010).
4. The change to legislation has meant that any change of use between a dwellinghouse and a small HMO has been able to occur without the need for planning permission.
5. The Housing Act 2004 in sections 254-259 defines an HMO as follows:
 - An entire house or flat which is let to three or more tenants who form two or more households and who share a kitchen, bathroom or toilet.
 - A house which has been converted entirely into bedsits or other non-self-contained accommodation and which is let to three or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities.

- A converted house which contains one or more flats which are not wholly self contained (i.e. the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by three or more tenants who form two or more households.
- A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies.

Over-concentration of HMOs on Henshaw Street

6. Henshaw Street (Appendix B) is located in the northern part of the borough, in the East Walworth Ward. Situated close to the amenities of Elephant and Castle town centre, and within walking distance to underground and mainline rail links from Elephant and Castle and good bus links, it is an extremely well connected area, with a public transport accessibility level (PTAL) of 6a.
7. Complaints were received by the council from residents of Henshaw Street throughout 2010 and 2011 in relation to noise and other anti-social behaviour in connection with the large number of properties on the street in use as HMOs.
8. Further investigation in regard to these complaints and the number of HMOs on the street was carried out by the council during May and June of 2012. Efforts have been made to address problems with noise disturbance and anti social behaviour through Southwark Mediation, working with some landlords and residents. While this has produced some results, these have only been in cases where landlords are willing to go further than what is required of them by law.
9. The residents of Henshaw Street have provided a signed petition from 31 households in the street requesting that an Article 4 Direction be introduced to restrict any further permitted development from a dwellinghouse to an HMO. Residents believe that an Article 4 Direction will stop further harm occurring from additional HMOs, and, over time, may lead to a reduction in the number of HMOs present on the street.
10. Further details about the over-concentration of HMOs in Henshaw Street and their impact can be found in paragraphs 24-30 of this report.

Article 4 Directions

11. An Article 4 Direction can be used to remove specific permitted development rights in all or parts of the local authority's area. It would not restrict development altogether, but instead ensure that development requires planning permission. A planning application for the proposal would need to be submitted that would then be determined in accordance with the development plan.
12. The National Planning Policy Framework (NPPF) advises that the use of Article 4 Directions to remove national permitted development rights should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area (paragraph 200).
13. The process for confirming a non-immediate Article 4 Direction is as follows:

- Stage 1 (the current stage) – The council decides whether to go ahead and introduce a Direction setting a date in the Notice for when the Direction will come into force which must be at least 28 days and no more than 2 years after representations can first be made, which is usually after the last publication/service date;
- Stage 2 – Publication / Consultation stage. The council:
 - a) publishes the notice of direction in a local newspaper
 - b) formally consults with the owners and occupiers of every part of the land within the area or site to which the Direction relates over a period of at least 21 days
 - c) and places the notice up on site for 6 weeks;
- Stage 3 – On the same day that the notice is given under Stage 2 above, the council refers its decision to the Secretary of State who has wide powers to modify or cancel a Direction.
- Stage 4 – Confirmation Stage – The council cannot confirm the Direction until after a period of at least 28 days from publication/service of the Notice. Once a Direction has been confirmed, the council must give notice of the confirmation in the same way as it gave notice of the initial direction, and must specify the date that the direction comes into force. A copy of the direction as confirmed must also be sent to the Secretary of State.

Compensation

14. In some circumstances the council can be liable to compensate developers or landowners whose developments are affected by Article 4 Directions. Local planning authorities are liable to pay compensation to landowners who would have been able to develop under the permitted development rights that an Article 4 Direction withdraws, if they:
 - Refuse planning permission for development which would have been permitted development if it were not for an Article 4 Direction; or
 - Grant planning permission subject to more limiting conditions than the GPDO would normally allow, as a result of an Article 4 Direction being in place.
15. In the above circumstances compensation is payable almost as if the council had granted planning permission for the development and had then subsequently revoked it. Compensation may also be claimed for abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights. ‘Abortive expenditure’ includes works carried out under the permitted development rights before they were removed, as well as the preparation of plans for the purposes of any work.
16. Loss or damage directly attributable to the withdrawal of permitted development rights would include the depreciation in the value of land or a building(s), when its value with the permitted development right is compared to its value without the right.
17. However, no compensation is payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
 - The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) Regulations 2013 (the permitted development rights cited in Schedule 2, Part 3, Class I is included in this list)
 - The permitted development right is withdrawn in the prescribed manner

- Notice of withdrawal is given in the prescribed manner:
 - Not less than 12 months before it takes effect
 - Not more than the prescribed period.
18. Permitted development rights granted by Schedule 2, Part 3, Class I are a prescribed development, which means that compensation will only be payable for 12 months from the date that the Direction comes into force. If the authority gives 12 months notice before bringing the Direction into force, which this report is recommending, no compensation would be payable. As mentioned in paragraph 13 above the council can confirm a Direction between 28 days and 2 years after the Direction has first been published/consulted upon.

Planning applications

19. If permitted development rights are withdrawn and planning permission is required, the council would be obliged to determine the proposal in accordance with the development plan unless material considerations indicate otherwise. In Southwark's case, the development plan includes the London Plan, the Core Strategy, saved policies in the Southwark Plan and adopted area action plans. The relevant saved policy in the Southwark Plan is 4.7 Non Self-contained housing for identified user groups. It should be noted that an Article 4 Direction would not apply retrospectively and would not necessarily reduce the current number of HMOs, and would also not necessarily mean that applications for new HMOs would be refused.
20. In addition, it should be noted that where submission of a planning application is required as a result of withdrawal of permitted development rights through an Article 4 Direction, the council cannot charge a planning application fee.

KEY ISSUES FOR CONSIDERATION

21. As is noted above, the NPPF advises that the use of Article 4 Directions to remove permitted development rights should be limited to situations where it is necessary to protect local amenity or the wellbeing of the area. Further guidance on the use of Article 4 Directions is set out in Replacement Appendix D to DoE Circular 9/95: General Development Consolidation Order 1995 which was issued in June 2012. This states that an Article 4 direction would be appropriate only in those exceptional circumstances where evidence suggests that the exercise of permitted development rights would harm local amenity or the proper planning of the area.
22. Government guidance on planning regulations relating to changes of use for dwellinghouses and houses in multiple occupation is set out in Communities and Local Government Circular 08/2010. Paragraph 2 of the Circular states that ...'A high concentration of shared homes can sometimes cause problems, especially if too many properties in one area are let to short term tenants with little stake in the local community.'
23. In summary, local authorities are advised to provide evidence of the harm that would result from further uncontrolled HMO development on the amenities of an area and on the proper planning of an area. Examples of potential harm are set out in the guidance with those pertinent to the control of HMOs being the undermining of visual amenity and the undermining of local objectives to create or maintain mixed communities.

Evidence from the community of the concentration of HMOs in Henshaw Street and beyond

24. In light of the government's objectives through the Localism Act (2011) of handing power back to local communities to protect and promote important environmental and social interests it is considered that evidence brought forward by the residents of Henshaw Street about the social harm caused by high numbers of HMOs is material to any consideration of the making of Article 4 directions. In making such directions the council would be seeking to act in the wider interests of its communities.
25. Henshaw Street itself is a cul-de-sac, with access from Balfour Street to the south west, and no through route (Appendix B). The street measures approximately 200 metres in length and accommodates 78 three storey terraced properties, of which 77 are in use as single houses, and one has been converted into flats. The streets immediately surrounding Henshaw Street, namely Chatham Street, Searles Road, Darwin Street and Balfour Street exhibit, in part, a similar type, size and age of property to Henshaw Street. However these surrounding streets are not as in tact as Henshaw Street, also accommodating more modern houses and blocks of flats.
26. The excellent transport connections and close proximity to places of employment and study has made Henshaw Street attractive to landlords looking to let out properties on a room by room basis, or a whole house to a group of people.
27. Evidence provided by residents of Henshaw Street to date, and the follow up investigation by the Planning Enforcement team during 2012 has provided a comprehensive picture of the number of HMOs on the street. Initial data from the residents of Henshaw Street put the number of properties in use as HMOs at 42 of the 78 properties on the street, accounting for 54% of the street. Using Land Registry details and Planning Contravention Notices further information was requested regarding the use of these 42 properties. Responses were received in relation to 32 of the 42 properties contacted, a response rate of 76%. 29 of the 32 responses met the criteria of a HMO. In total, 29 properties have been confirmed to be in use as a C4 HMO (37%) (Appendix C).
28. Further information received in 2013 from residents of Henshaw Street suggests that the number of HMOs has increased and residents suggest a higher figure of 40 properties (51%) in use as a HMO. This is considered to be a very high concentration of HMOs for one particular street. Although Southwark has no policy identifying an acceptable level of HMOs in any particular street or area, other local authorities have adopted thresholds of 10%.
29. Data has been obtained from Private Sector Housing and Public Health teams which identifies the use of residential properties in the borough. It is a record of properties that they have visited/inspected through necessity rather than a full survey or record of the borough's residential properties. This data is not a complete record. However it is considered that it provides a good overview of HMOs across the borough.

Table 1 - By Postcode Area

SE1	SE4	SE5	SE8	SE11	SE14	SE15	SE16
428	2	343	27	37	2	472	318

SE17	SE19	SE21	SE22	SE23	SE24	SE26	
222	18	21	312	5	42	3	

Table 2 - By Ward

Brunswick Park	Camberwell Green	Cathedrals	Chaucer	College	East Dulwich	East Walworth
131	126	141	72	67	133	146

Faraday	Grange	Livesey	Newington	Nunhead	Peckham	Peckham Rye
97	117	96	90	110	78	141

Riverside	Rotherhithe	South Bermondsey	South Camberwell	Surrey Docks	The Lane	Village
64	125	83	65	125	156	86

30. The breakdown by postcode district area and ward above suggests that HMOs are more concentrated in particular areas of the borough. SE1 and SE15 list the highest number of HMOs, however these postcode areas cover larger areas than others and are not fully contained within Southwark's boundaries. Looking at HMO data by ward produces similar conclusions. The data indicates that the East Walworth ward contains the second highest number of HMOs in the borough.

Harm caused by high concentrations of HMOs

31. The 2010 report by DCLG "Evidence Gathering – Housing in Multiple Occupation and possible planning responses" 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:
- 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 rented sector at the expenses of owner-occupation
 - pressure upon local community facilities
 - restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.
32. Common complaints in regards to HMOs relate to noise, anti-social behaviour, refuse arrangements and transports considerations such as parking and cycle storage. In addition HMOs are often seen to increase the amount of residents living at a property, with a C4 HMO permitting up to six inhabitants, and introduce a more transient population to an area. Analysis of complaints from residents of Henshaw Street show that they have mainly been concerned with an increase in noise, nuisance and anti-social behaviour as a result of the high concentration of HMOs in the street. During follow up meetings with residents concerns were also raised over the impact of such a

concentration of HMOs on the local community, due to a more transient, mainly student, population occupying the HMOs.

33. A high concentration of HMOs reduces the provision of purpose built family sized dwellings within the borough's housing stock.

Contribution of HMOs to Housing Needs

34. Across Southwark HMOs form a significant part of the private rented housing stock. The Southwark Private Sector House Condition Survey 2008 estimated that there were 3,650 HMOs in the borough.
35. They can provide residential accommodation to identified groups, sometimes in need of support or care, individuals on housing benefit, and general housing to individuals such as students or young professionals. Following recent reform to housing benefits, the entitlement for a single, childless adult under the age of 35 is a single room in shared house as opposed to a self-contained unit.
36. HMOs are sometimes no more than a change in the mode of occupation of the property, where for example a group of unrelated students or friends sign an Assured Shorthold Tenancy (AST) for the whole property. HMOs that have undergone internal conversion are usually let out on a room by room basis, with the landlord or estate agent responsible for finding new tenants and, who beyond the shared facilities may have little interaction with each other.
37. In London the contribution of HMOs to general housing provision is considered significant. This is due to a number of factors:
- people wanting basic accommodation during the week
 - the affordable nature of renting a room rather than a self contained unit
 - the attractiveness to landlords, as a result of the often minimal physical changes needed to a property, and that the conversion to a 6 person HMO, including any internal works, does not need planning permission.
38. The London Plan 2011 Policy 3.8 advocates that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. It identifies HMOs as a strategically important part of London's housing offer and advocates their protection where they are of reasonable standard. The London Plan 2011 also requires that in considering proposals which might constrain HMO provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.
39. However, the council must ensure that HMOs are spread out appropriately across the borough and measures are put in places to control the development of further HMOs in those areas where there are higher numbers of HMOs and a high number of complaints. This will help to ensure that local objectives to create more mixed, balanced and cohesive communities are not undermined.
40. Southwark's Strategic Housing Market Assessment (SHMA) (2008) and Housing Requirement Study identify that there is a need for more family housing in the borough across all tenures. The SHMA shows there is 60% need for 3 bedroom plus dwellings when modelled against the London Plan targets. The SHMA also shows a need for 2

bedroom dwellings, particularly within market housing. 2 bedrooms dwellings also frequently provide homes for families in need of larger dwellings due to the deficit of 3 bedroom plus homes.

41. The last London SHMA refers to the failure to provide enough larger homes has seen over-crowding among families grow by a third over the decade to 2007. At the moment, as identified in Southwark's Housing Requirements Study 13,986 households live in overcrowded accommodation.
42. The creation and maintenance of mixed, balanced and sustainable communities is a strategic objective of the Core Strategy. Policies within the document seek to promote housing choice and aim to prevent concentrations of particular housing types that may limit housing choice in an area or harmfully erode the mix and balance of a community. In particular, Core Strategy policies 6 and 7 require all new residential development to provide a mix of housing tenures, types and sizes. Policy 8 sets out the approach to new student housing. Our strategy is to work with local universities and colleges to make sure that new student housing is built where it is needed. The council encourage student housing in town centres and places with good public transport accessibility. However the policy requires provision of 35% affordable housing within student housing schemes. This is to encourage wider conventional housing in addition to encouraging student housing where it does not harm the local character and is supported by local educational institutions. Southwark has the highest amount of specialist purpose build student accommodation and overall when combined with private bed spaces, the borough accommodates the second largest number of student homes in London.

Current controls over HMOs

43. The Housing Act 2004 introduced mandatory licensing, which placed a duty on local authorities to license all HMOs that are three storeys and over, and are occupied by five or more people forming two or more households. Private Sector Housing and Public Health are the responsible sections in the council for HMO Licensing.
44. The properties on Henshaw Street are three storeys high. However, the investigation into the properties during 2012 showed that the vast majority of these properties were occupied by no more than four people, meaning that they fall short of the mandatory licensing threshold of five people. Local authorities can, at their discretion, apply to the Secretary of State to extend licensing (additional licensing) to smaller types of HMOs.
45. Private Sector Housing and Public Health also have adopted HMO Standards, which apply to all HMOs, licensable or not. These standards place requirements upon landlords relating to issues such as fire safety, state of repair, room size, light, noise, security, food safety, minimum facilities, and management of the property.

Other Local Authorities

23. A borough wide Article 4 Direction to remove permitted development rights related to small HMOs has already been implemented by Barking and Dagenham Council, Enfield Council and Newham Council.

Conclusions

46. An Article 4 Direction can be made if the council is satisfied that it is expedient that development should not be carried out unless planning permission is granted on application. In determining whether it is expedient the council should have regard to material considerations including the advice given in Replacement Appendix D to Circular 09/95 (DCLG, June 2012). As noted the advice given by the government is that local authorities should only consider making Article 4 Directions in exceptional circumstances. Such exceptional circumstances exist in the case of the proposed Article 4 Direction which are the subject of this report.
47. Class I of the GPDO grants permitted development rights to change from a dwellinghouse to an HMO and vice versa. It is not possible to withdraw permitted development rights for selective developments within a Class in the GPDO and if permitted development rights are withdrawn, both the above changes would require planning permission. Overall it is considered that the potential for harm generated by change of use from a dwellinghouse to an HMO significantly outweighs the benefits gained by enabling occupiers to exercise permitted development rights to change from an HMO to a dwellinghouse.

Consultation

48. Consultation on the Article 4 Direction will comply with provisions set out in Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2010. Notice of the Direction will be made by:
 - Local advertisement in the press;
 - At least two site notices placed on Henshaw Street for a period of at least 6 weeks; and
 - Written notification sent to every owner/occupier on Henshaw Street, specifying a period of at least 21 days in which representations can be made.
49. Following expiry of the consultation period a report recommending whether the Direction should be confirmed will be reported back to planning committee.

Community impact statement

50. Concerns have been expressed by residents of Henshaw Street on the impacts associated with the concentration of HMOs on the street, and, more broadly the undermining of the general amenity and quality of life of the permanent residents of the area. A petition from 31 residents of Henshaw Street on the making of an Article 4 direction was received by the council.
51. It is clear from the problems which have been identified and the concerns expressed by residents that further uncontrolled HMO expansion on Henshaw Street would result in further harm to the owner occupiers living on the street. In the circumstances, the council would wish to control the development of further HMOs in this area where there is a high number of HMOs and a high number of complaints.
52. Officers do not consider that either the process or direct outcome of introducing an Article 4 direction raises any equalities issues. Affected parties would only include those required to submit a planning application i.e. existing or prospective landlords on

Henshaw Street. Such an action could not be construed as discriminatory against any protected characteristic or disadvantaging to any particular group. Overall the equalities analysis (Appendix D) resulted in a positive impact on the protected characteristic groups as a result of the implementation of the Article 4 Direction. On the basis of the evidence available, the council will be seeking to encourage a broader mix of housing over the long term and to reduce the problems associated with a concentration of HMOs. An inability to control further changes of use to HMOs will therefore undermine local objectives to create more mixed, balanced and cohesive communities.

Financial implications

53. There are no immediate direct financial implications arising from the recommendations. All prior preparatory and background work feeding into the report was undertaken existing establishment staff. The cost of the consultation process including the staffing resources, collation and evaluation of responses will be contained within planning budgets with no call on other council resources.
54. However, as noted in the report, should the decision be made to refuse planning permission for development that otherwise would have been granted by Schedule 2, Part 3, Class I the landowner/developer will have a period of 12 months in which they can make a claim to the council for compensation, from the date when the Direction comes into force. Any compensation may relate either to a depreciation in the value of land or buildings which results from failure to gain planning permission or to abortive expenditure.
55. By giving 12 months notice before bringing the Direction into force, the council will remove its liability to pay compensation. If the council were to introduce the Direction with immediate effect there would be a risk that it would make the council liable to compensation claims.
56. The recommendation in this report is for the adoption of a non-immediate article 4 Direction so no compensation claims or any further financial implications are anticipated.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Legal Services (SH/09/13)

57. Planning committee is being asked to approve the making of a non-immediate Article 4 Direction to withdraw the permitted development rights granted by Schedule 2 Part 2, Class I of the GPDO 1995 (as amended). Part 3F of the Constitution under the section titled "Matters reserved for decision by the planning committee" at paragraph 3 reserves to planning committee any authorisations under Article 4 of the Town and Country Planning Permitted Development Order. This therefore confirms that planning committee has authority to take these decisions.
58. Section 108 of the Town and Country Planning Act 1990 (as amended) specifies the circumstances under which compensation is payable for the refusal or a conditional grant of planning permission which was formerly granted by a development order or a local development order. Replacement Appendix D of Circular 9/95 published in June 2012 states at paragraph 6.4 that all claims from compensation must be made within

12 months of the date on which the planning application for development formerly permitted is rejected or approved subject to conditions.

59. Section 108 has been recently amended to deal with those circumstances where permission granted under a development order has been withdrawn for development of a 'prescribed description' which is defined in section 2 of the Town and Country Planning (Compensation) (England) Regulations 2013. The effect of these new provisions is to limit the circumstances where compensation is payable for "prescribed description" development. In cases where notice of the withdrawal of the permitted development rights was published at least 12 months before the direction took effect NO compensation will be payable, even if the claim was made within 12 months of the direction coming into effect. As this Direction relates to development of a "prescribed description" and the council is giving more than 12 months notice of the Article 4 Direction the council would not need to pay any compensation.

Human rights and equalities

60. Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way which is incompatible with the European Convention on Human Rights (ECHR). Various Convention rights may be engaged in the process of making and considering the Article 4 Direction, including under Articles 1 and 8 of the First Protocol. The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the council's powers and duties as a local planning authority. Any interference with a Convention Right must be necessary and proportionate.
61. The council has carefully considered the balance to be struck between individual rights and the wider public interest. The rights of all of the owners of land in Henshaw Street have been considered under the Human Rights Act 1998, in particular those contained within Article 1 of the Convention which relates to the Protection of Property and Article 8 of the Convention, which protects private and family life, home and correspondence and both have been taken into account by the council in the consideration of consulting upon the making of this non-immediate Article 4 Direction. The effect of the Article 4 Direction will not be to interfere with the existing development rights enjoyed by the residents of Henshaw Street as the Article 4 Direction does not have retrospective effect. It will only affect future planning applications made in respect of a change of use from a dwellinghouse (use class C3) to a House in Multiple Occupation for not more than 6 people (use class C4) by ensuring that an express application for planning permission is made. The effect of the Article 4 Direction being made will be to reduce harm to the amenity of existing residents and to also encourage a balanced and mixed community. The council considers that the advantages of making the Article 4 Direction substantially outweigh the disadvantages to those residents who will no longer be able to benefit from the permitted rights granted for any future change of use.
62. In consulting upon the introduction of the non-immediate Article 4 Direction the council has had regard to its public sector equality duty (PSED) under s.149 of the Equality Act 2010.
63. The PSED is only one factor that needs to be considered when making a decision and may be balanced against other relevant factors. The council also took into account other relevant factors in respect of the decision, including financial resources and

policy considerations. In appropriate cases, such countervailing factors may justify decisions which have an adverse impact on protected groups.

Strategic Director of Finance and Corporate Services (CE/MD/13/09)

64. The financial implications in paragraphs 53 to 56 above are noted, and it is recognised that the cost of the consultation can be contained within existing departmental budgets. No further costs are expected at this stage: as this is a non-immediate direction no compensation will be payable to any party affected by this decision.

BACKGROUND DOCUMENTS

Background Documents	Held At	Contact
Saved Southwark Plan 2007	http://www.southwark.gov.uk/info/856/planning_policy/1241/the_southwark_plan	planningpolicy@southwark.gov.uk
The Core Strategy 2011	http://www.southwark.gov.uk/info/200210/core_strategy	planningpolicy@southwark.gov.uk
Residents' Petition	160 Tooley Street, SE1 2QH	planningpolicy@southwark.gov.uk

APPENDICES

No.	Title
Appendix A	Draft Article 4 Direction
Appendix B	Henshaw Street map
Appendix C	Henshaw Street HMOs
Appendix D	Equalities analysis

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Tim Cutts, Team Leader, Planning Policy		
Version	Final		
Dated	28 September 2013		
Key Decision?	Non-key		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments sought	Comments included	
Director of Legal Services	Yes	Yes	
Strategic Director of Finance and Corporate Services	Yes	Yes	
Cabinet Member	Yes	No	
Date final report sent to Constitutional Team		28 September 2013	