

# Planning Committee

09 December 2025



<b>Title</b>	Houses in Multiple Occupation (HMOs)
<b>Purpose of the report</b>	<ul style="list-style-type: none"><li>To make a decision</li></ul>
<b>Report Author</b>	Matthew Churchill, Principal Planning Officer Liz McNulty, Planning Enforcement Officer Fidelma Bahoshy, Joint Senior Environmental Health Manager Susan Turp, Principal Environmental Health Officer
<b>Wards Affected</b>	Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East wards
<b>Exempt</b>	Staines, Stanwell North, Ashford North & Stanwell South
<b>Exemption Reason</b>	These wards are already subject to an Article 4 Direction restricting the permitted development right to convert a dwelling house into a small HMO.
<b>Corporate Priority</b>	Community Addressing housing needs Environment Services
<b>Recommendations</b>	<b>The Planning Committee is asked to note:</b> <ul style="list-style-type: none"><li>The contents of this report.</li><li>To consider whether to confirm the Article 4 Direction made on 05 March 2025 in respect of the Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East Wards, having regard to the representations made.</li></ul>

Reason for Recommendation	<p>In April 2024, members of the Council's Corporate Policy and Procedures Committee determined that a 'non-immediate' Article 4 Direction should be made to remove the permitted development right to convert a dwelling house into a small House of Multiple Occupation (HMO) across three wards in Spelthorne where the most complaints relating to HMO's had been received; Ashford North &amp; Stanwell South, Staines and Stanwell North. This followed previous assessments of HMOs in 2018 and 2020, where it was agreed that there was insufficient evidence to create an Article 4 Direction.</p> <p>The 'non-immediate' Article 4 Direction covering the three wards was made on 21 August 2024. It was then resolved at planning committee on 08 January 2025, having reviewed the available evidence and representations received during the required consultation period, that the Article 4 Direction should be confirmed, which was undertaken on 18 February 2025. The Article 4 Direction then came into effect on 29 August 2025. Consequently, planning permission is now required to convert a dwelling house into a small HMO in those three wards.</p> <p>At planning committee on 08 January 2025, the Council also resolved to make a further 'non-immediate' Article 4 Direction that would remove the permitted development right to convert a dwelling into a small HMO in all the remaining wards in Spelthorne that were not already covered by the first Article 4 Direction; Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East.</p> <p>The second Article 4 Direction was made on 05 March 2025. In accordance with the procedure set out in the <i>Town and Country Planning (General Permitted Development) Order 2015 (as amended)</i>, members must now decide, having regard to responses received during the consultation period, whether to confirm the Direction. Should it be confirmed, it would come into effect on 13 March 2026, meaning that planning permission would be required to convert a dwelling house into a small HMO in those ten wards on or after that date.</p> <p>The HMO data for the borough has also now also been reassessed with one year's additional data contained in this report.</p>
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## 1. Summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"><li>In 2018, 2020 and 2024, Planning and Environmental Health data was assessed to determine whether an Article 4 Direction should be served in respect of restricting HMOs. It was agreed in the earlier years that there was insufficient evidence to justify taking this action. However, in April 2024, it was resolved that an Article 4 Direction should be made in respect of three wards where the most HMO complaints had been received; Ashford North &amp; Stanwell South, Staines and Stanwell North. The Article 4 Direction was made on 21 August 2024 and came into effect on 29 August 2025. Following a resolution at planning committee on 08 January 2025, a further Article 4 Direction was made on 05 March 2025, that covers the ten remaining wards in Spelthorne, although this has not yet been confirmed. A further one year's assessment of HMO data has now been undertaken.</li></ul>	<ul style="list-style-type: none"><li>Planning and Environmental Health services have a duty to investigate complaints and to ensure that the licencing process is properly enforced.</li></ul>
This is what we want to do about it	These are the next steps
<ul style="list-style-type: none"><li>Members, having regard to representations received during the consultation period, must decide whether to confirm the Article 4 Direction made on 05 March 2024, covering the ten wards in the borough not already subject to the first Article 4 Direction.</li></ul>	<ul style="list-style-type: none"><li>If the Article 4 Direction is confirmed, it will come into effect on 13 March 2026 across the ten relevant wards.</li><li>If the Article 4 Direction is not confirmed, a further report will be presented to the Planning Committee by December 2026 assessing an additional year's HMO data.</li></ul>

- 1.1 Under Schedule, 2 Part 3, Class L of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), it is possible to

convert a dwelling House (C3 use) into a small HMO (C4 use) without planning permission. A small HMO is occupied between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

- 1.2 It is possible to make an Article 4 Direction under the Town & Country Planning (General Permitted Development) (England) Order 2015 (As amended) to remove the permitted development right to convert a dwelling house into a House of Multiple Occupation (HMO) in certain areas, regardless of the number of occupants.
- 1.3 It is important to note that an Article 4 Direction does not stop development, rather it means that planning permission is required for a specific development that without the Article 4 Direction, would not normally require planning permission (i.e. it would constitute permitted development). Article 4 Directions are intended for use in exceptional circumstances where evidence suggests that development under Permitted Development rights harms local amenity or the proper planning of an area.
- 1.4 The introduction of an Article 4 Direction removing permitted development rights to convert dwellings into small HMOs was previously considered by the former O&S Committee in November 2018 and January 2020, where it was agreed that given the available data, evidence was insufficient at that stage to justify the introduction of an Article 4 Direction.
- 1.5 However, in April 2024, the Council's Corporate Policy and Resources Committee determined that a 'non-immediate' Article 4 Direction should be made to remove the permitted development right to convert a dwelling house into a small HMO (occupied between three and six individuals), across three wards in the borough where the Council had received the most complaints namely; Staines, Ashford North & Stanwell South, and Stanwell North.
- 1.6 The 'non-immediate' Article 4 Direction covering those three wards was made in August 2024. Before a 'non-immediate' Article 4 Direction comes into effect, it must be confirmed having regard to any representations received during the relevant consultation period. At a planning committee meeting on 08 January 2025, members having reviewed the available evidence, including representations received during the consultation period, resolved to confirm the Article 4 Direction. It was then confirmed on 18 February 2025 and came into effect across the three wards on 29 August 2025. This means that planning permission is now required to convert a dwelling house into a small HMO in those three wards.
- 1.7 At the planning committee meeting on 08 January 2025, it was also decided that a second 'non-immediate' Article 4 Direction should be made to remove the permitted development right to convert a dwelling into a small HMO across all remaining wards in Spelthorne, namely; Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East.

- 1.8 The second 'non-immediate' Article 4 Direction was made on 05 March 2025, and members must now consider having regard to representations received during the consultation period, which have been included in **Appendix 1**, whether to confirm the second Article 4 Direction covering all remaining wards in Spelthorne. Should the Article 4 Direction be confirmed it will come into effect on 13 March 2026.
- 1.9 This report uses Planning and Environmental Health data over the past year to update the data presented in the report to planning committee on 08 January 2025. It includes a spatial analysis, by ward, of the numbers and types of HMOs which exist and the extent of the investigations undertaken in Spelthorne by the Planning Enforcement team.

## **2. Key issues**

- 2.1 Under planning legislation, The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the UCO) sets land use activities into various use classes. Uses are grouped into Classes B, C, E, F and *sui generis* (a unique use not within a specified Use Class) and within each group, there are further subdivisions of use classes. Planning permission is normally required to change from one use class to another although there are exceptions where the legislation does allow some changes between uses (The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)).
- 2.2 Dwellings fall within Use Class C3 of the UCO. Houses in multiple occupation (HMOs) are contained within both Use Class C4 or *sui generis*. Class C4 defines a small HMO as:
- Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.*
- 2.3 An HMO larger than this (i.e. with 7 or more unrelated people) is classed as a '*sui generis*' use for which planning permission is always required.
- 2.4 In the ten wards in Spelthorne not already covered by the first Article 4 Direction, planning permission is not required to change from a Class C3 dwelling house to Class C4 HMO (subject to that property retaining the relevant permitted development rights). It is also permitted to change a Class C4 HMO property back to a Class C3 dwelling house without planning permission.
- 2.5 However, converting dwellings to an HMO, when classed as *sui generis* (i.e. seven or more occupants) requires planning permission in both the area subject to the first Article 4 Direction and the remaining ten wards. Likewise, a conversion from a large HMO to any other use will also require planning permission.
- 2.6 Directions are made under the Article 4 Direction of the Town & Country Planning General Permitted Development Order which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area. They remove Permitted Development Rights for certain

types of specified development in certain areas but cannot be used to restrict changes between uses in the same use class of the Use Classes Order. Article 4 Directions do not stop development; they simply mean that planning permission is required for the specified development which, without the Article 4 Direction would be permitted development (i.e. does not require planning permission).

- 2.7 Article 4 Directions are intended for use in exceptional circumstances where evidence suggests that development under Permitted Development rights, such as the spread of HMOs, harms local amenity or the proper planning of an area.
- 2.8 The Planning Practice Guidance (PPG) advises that all Article 4 Directions should be applied in a measured and targeted way. They should be based on robust evidence and apply to the smallest geographical area possible. Requirements for removing permitted development rights compels the planning authority to demonstrate that the removal is necessary to protect local amenity or the wellbeing of a particular geographic area. The potential harm that the Article 4 Direction is intended to address will need to be clearly identified, and there will need to be a particularly strong justification for the withdrawal of permitted development rights relating to, amongst other things, a wide area (e.g. those covering a large proportion of or the entire area of a local planning authority).
- 2.9 The PPG further advises that if a local planning authority makes an Article 4 Direction, it can be liable to pay compensation to those whose permitted development rights have been withdrawn, but only if it then subsequently:
- refuses planning permission for development which would otherwise have been permitted development; or
  - grants planning permission subject to more limiting conditions than the General Permitted Development Order
- 2.10 The grounds on which compensation can be claimed are limited to abortive expenditure or other loss or damage directly attributable to the withdrawal of permitted development rights.
- 2.11 In procedural terms there are two types of Article 4 Directions: -
- Non-Immediate Direction – permitted development rights are withdrawn 12 months from service of the direction after a period of consultation.
  - Immediate Direction – permitted development rights are withdrawn immediately but must be confirmed within six months after a period of consultation. The Council becomes liable for abortive expenditure or other loss or damage attributable to withdrawal of the permitted development rights, if a subsequent application is refused. The 'other loss or damage' would include the difference in the value of the site and would expose the Council to potentially significant financial liability.
- 2.12 Consequently, compensation would be payable in some circumstances to those whose Permitted Development (PD) rights are withdrawn if the Local Planning

Authority (LPA) imposed what is known as an “Immediate” Article 4 Direction and then refused planning permission for that which would otherwise have been PD; or granted permission subject to more limiting conditions than would have been applied by the General Permitted Development Order (GPDO). However, if the Council is providing 12 months’ prior notice of the removal of PD rights in respect of HMOs (known as a “Non-Immediate” Article 4 Direction), then there is no ability to claim compensation.

- 2.13 The circumstances in which an immediate direction can restrict development are limited. Immediate directions can be made in relation to development permitted by the General Permitted Development Order, where the development presents an immediate threat to local amenity or prejudices the proper planning of an area. Immediate directions can also be made in relation to certain types of development in conservation areas. In all cases the local planning authorities must have already begun the consultation processes towards the making a non-immediate Article 4 Direction. Consequently, if the Article 4 takes effect less than one year from issue, compensation can be payable to affected landowners.
- 2.14 In this instance, the Council made a non-immediate Article 4 Direction covering ten wards Spelthorne, which the Council must now consider whether to confirm the Direction.
- 2.15 A local planning authority must, as soon as practicable after confirming an Article 4 Direction, inform the Secretary of State. The Secretary of State does not have to approve Article 4 Directions and will only intervene when there are clear reasons for doing so. The Secretary of State has the power to modify or cancel Article 4 Directions at any time before or after they are made but will not use their powers unless there are clear reasons why intervention at this level is necessary.
- 2.16 It should be noted that planning applications required by Article 4 Directions were previously exempt from planning application fees, but this exemption has been removed and a planning fee is payable. The current fee would be £588 per application. In addition, a HMO licence fee may also be payable should it meet the HMO licensing requirements, that is if the property is an HMO with 5 or more occupants where there is sharing of basic amenity.

### **3. Options analysis and proposal**

- 3.1 At a time when house prices remain high and access to finance limited, sharing a dwelling with others will continue to be an attractive option. HMOs fulfil a vital role in providing accommodation for individuals and are an essential part of the housing stock. The cost of living in an HMO is cheaper than self-contained accommodation, which is beyond the affordability of many residents. HMOs provide an essential tenure of housing and are an important element of the Council’s housing stock.
- 3.2 However, there are concerns that as well as providing much needed affordable accommodation to residents, HMOs can also have negative effects. Impacts, either real or perceived from complaints received include the following:

- Noise and accumulations / waste management
  - Anti-social behaviour
  - Imbalanced and unsustainable communities
  - Negative impact on the physical environment
  - Allegations of unsafe practices during construction and concerns about substandard building works
  - Pressures upon parking provision
  - Growth in private rented sector at the expense of owner-occupation
  - Increased crime, and
  - Pressure upon local community facilities.
- 3.3 All planning enforcement investigations undertaken relating to HMOs which did not require planning permission because they contained six residents have been recorded.
- 3.4 The Committee report in April 2024 considered four years of Planning and Environmental Health data:
- 01/10/19 – 30/09/20
  - 01/10/20 – 30/09/21
  - 01/10/21 – 30/09/22
  - 01/10/22 – 30/09/23
- 3.5 The report presented to planning committee in January 2025, considered all planning enforcement investigations between 01/10/2023 - 30/09/2024.
- 3.6 This report considers an additional year: **01/10/24 - 30/09/25**.
- 3.7 The results for the most recent year, 1 October 2024 – 30 September 2025 are shown by wards in the tables further below. Several investigations listed were inspected by the Planning Enforcement officers and it was established they were not HMOs at all.

Table 1 - HMO Investigations by Planning Enforcement by ward where Planning Permission was not required as it was Permitted Development between 1 October 2024 and 30 September 2025

Ward	Referred by EH (not a complaint)*	Total numbers of Investigations**	Numbers of Households	Number of investigations as a % of households
Ashford North & Stanwell South	2	4	3785	0.11%
Ashford Town	1	3	3465	0.087%



Shepperton Town	0	1	3384	0.03%
Staines South	1	4	2998	0.13%
Laleham & Shepperton Green	0	1	3607	0.03%
Sunbury Common	2	6	3504	0.17%
Riverside & Laleham	1	1	2918	0.03%
Ashford Common	1	4	3565	0.11%
Stanwell North	3	3	3517	0.09%
<b>Average</b>			<b>3,416</b>	<b>0.087%</b>
<b>Total</b>	<b>11</b>	<b>27</b>		

\*Referred by EH due to licence application

\*\*Numbers refer to complaints per property

In the last year, there were twenty-seven investigations undertaken by planning enforcement, eleven of which were referred by Environmental Health following an application for a licence.

3.8 There are four main reasons the use of an alleged HMO under investigation is lawful:

- C3 residential use – not an HMO
- C4 small HMO permitted use – a maximum of six occupants in an HMO
- Lawful SUI GENERIS use – more than 6 occupants in an HMO and has the required planning permission for this use
- No confirmed HMO use – zero occupants of a dwelling house

Table 2 - Reasons Planning Permission was not required between 1 October 2024 and 30 September 2025

By Ward & Reason	Count of Reason Planning Permission Not Required
<b>Ashford North &amp; Stanwell South</b>	4
C4 small HMO permitted use	<b>3</b>
C3 residential use - not an HMO	1
<b>Ashford Town</b>	3
C4 small HMO permitted use	<b>1</b>
C3 residential use - not an HMO	1
Lawful SUI GENERIS use – large HMO	1
<b>Shepperton Town</b>	1
C4 small HMO permitted use	<b>1</b>

<b>Staines South</b>	4
C4 small HMO permitted use	<b>1</b>
C3 residential use - not an HMO	3
<b>Laleham &amp; Shepperton Green</b>	1
C4 small HMO permitted use	<b>1</b>
<b>Stanwell North</b>	3
C4 small HMO permitted use	<b>2</b>
C3 residential use - not an HMO	1
<b>Sunbury Common</b>	6
C4 small HMO permitted use	<b>3</b>
C3 residential use - not an HMO	2
Lawful SUI GENERIS use – large HMO	1
<b>Riverside &amp; Laleham</b>	1
C4 small HMO permitted use	<b>1</b>
<b>Ashford Common</b>	4
C4 small HMO permitted use	<b>2</b>
C3 residential use - not an HMO	1
Lawful SUI GENERIS use – large HMO	1
Total HMO investigations Not Requiring Planning Permission	27
<b>Total HMO Investigations - C4 small HMO permitted use</b>	<b>15</b>

- 3.9 Of the **27** HMO investigation that did not require planning permission received **15** related to HMOs which were permitted development. Therefore, **15** investigations is the relevant figure in the consideration of an Article 4 Direction. However, **5** of the **15**, are situated in wards where an Article 4 Direction came into effect on 29 August 2025. This data is shown in a ward map attached as **Appendix 2**.

Table 3- HMO Permitted Development Investigations/Complaints as a % of households 2024-25

Ward	No. of small HMO C4 permitted use investigations **	No. of households	Number of investigations as a % of households*
Ashford North & Stanwell South*	3	3785	0.79%
Ashford Town	1	3465	0.03%
Shepperton Town	1	3384	0.03%
Staines South	1	2998	0.03%
Laleham & Shepperton Green	1	3607	0.03%
Stanwell North*	2	3517	0.06%
Sunbury Common	3	3504	0.035%
Riverside & Laleham	1	2918	0.03%
Ashford Common	2	3565	0.06%
<b>Total</b>	<b>15</b>		

\*These two wards are already subject to an Article 4 Direction, but the small C4 HMOs were lawfully implemented prior to the date the Article 4 Direction came into effect.

**3.10** Table 3 above shows that over the past year; five wards were subjected to one investigation each relating to an HMO which was a permitted C4 use and one of these cases was referred by EH following a licence application. Two of the wards in the table above are already subjected to an Article 4 Direction that came into effect in August 2025. There were no HMO investigations which were a permitted C4 use in the past year in four borough wards. The number of investigations/complaints as a % of the number of households is exceptionally low; between 0.03% and 0.79%.

**3.11** Table 4 below shows the number of HMO investigations undertaken by planning enforcement for the year 01/10/24 – 30/09/25 as a percentage of the total complaints received. These relate to HMOs which were a permitted C4 small HMO use. It can be seen that the % of planning enforcement investigation relating to HMOs is low, comprising an average of just 4.09% of all complaints received.

Table 4 – HMO Planning Enforcement investigations/complaints received compared with total

Planning Enforcement complaints received 01/10/2024 – 30/09/2025

Year	No. of HMO PD complaints/investigations	Total number of Planning Enforcement	Number of HMO Planning Enforcement
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		complaints received	complaints received as a % of total complaints
01/10/2024 – 30/09/2025	15	366	4.09%

- 3.12 The number of planning applications for HMOs (containing seven or more residents) by ward which were determined between 1 October 2024 and 30 September 2025 are set out in table 5 below. A full list of the site details is contained as **Appendix 3** to this report and the information is also portrayed in the maps contained in **Appendices 4 and 5**. Of the eleven applications, nine were refused permission and two were approved.

Table 5 - Planning applications for HMOs by ward determined between 1 October 2024 and 30 September 2025

Ward	Numbers of planning applications approved	Numbers of planning applications refused
Ashford Common	1	1
Ashford East	0	1
Ashford North & Stanwell South	0	4
Ashford Town	0	1
Halliford and Sunbury West	0	0
Laleham and Shepperton Green	0	0
Riverside and Laleham	0	0
Shepperton Town	0	0
Staines	0	1*
Staines South	0	1
Stanwell North	0	0
Sunbury Common	0	0
Sunbury East	1	0
<b>Grand Total</b>	<b>2</b>	<b>9</b>

\*Allowed on appeal

- 3.13 Table 6 further below shows the number of HMO enforcement investigations over the past six years 2019-2025 by ward. This information is also shown by ward map in **Appendix 6**. This is a combination of the data in this report for the past year and the data for the five previous years contained in the 08 January 2025 committee report covering 2019-2024. Ashford North and Stanwell South, Stanwell North and Staines (coloured green) are already the subject of an Article 4 Direction.

Table 6 HMO Permitted Development Investigations by Planning Enforcement 2019-2024 by ward (six years data)

<b>By Ward &amp; Reason</b>	<b>PP Not Required</b>
Ashford Common	5
Ashford East	5
<b>Ashford North &amp; Stanwell South</b>	<b>11</b>
Ashford Town	8
Halliford and Sunbury West	0
Laleham and Shepperton Green	1
Riverside and Laleham	4
Shepperton Town	1
<b>Staines</b>	<b>6</b>
Staines South	4
<b>Stanwell North</b>	<b>11</b>
Sunbury Common	7
Sunbury East	2
<b>Total PD Investigations</b>	<b>65</b>

- 3.14 The Planning Officers and Planning Enforcement Officers work closely with the Environmental Health Officers and Environmental Health Regulatory Officers who are responsible for the licensing of HMOs that fall within Spelthorne Borough Council's mandatory HMO licensing scheme. The two Departments share information about licence applications and planning applications as well as intelligence about potential HMOs.
- 3.15 A licence for an HMO is required from Environmental Health under the mandatory scheme in the following circumstances:
- The dwelling is occupied by five or more people who form two or more households; and
  - all or some of the occupants share bathroom, toilet, or kitchen facilities.
- 3.16 It should be noted that before the licensing regime change (which was from the October 2018) a licence was only required for HMOs in three or more storey buildings. Consequently, a much larger number of HMOs now fall within the Environmental Health licensing process.
- 3.17 When determining whether to grant a licence for an HMO, Environmental Health are not able to take into consideration whether or not the property has or requires planning permission to operate as an HMO. Environmental Health does, however, consult with Planning on any licence applications received where Planning Consent would apply (currently for properties with 7 or more occupiers) and notify them when granting a licence so that Planning can take appropriate enforcement action for unlawful development. Environmental Health also strongly advise HMO licence applicants to contact Planning where Planning Permission isn't in place and may be required.

- 3.18 Additionally, since 1 April 2024 when Environmental Health moved to a risk-based system to determine the duration of an HMO licence, the absence of planning consent for an HMO of 7 or more occupants has become a criteria resulting in a high score in the risk assessment. This would in turn lead to the licence being granted for the minimum period of one year. If the licence holder applied for a renewal on expiry of the year, Environmental Health would again liaise with Planning to ensure that either planning consent was in place, or if not, that appropriate enforcement action could be taken.
- 3.19 The following table shows the number of HMOs licensed by Environmental Health, by ward as well as the number of potential HMOs that have come to the attention of Environmental Health through complaints and enquiries.

Table 7 - Number of HMOs that have been licensed as of 30 September 2025, and the number of potential HMOs brought to the attention of Environmental Health between 1 October 2024 and 30 September 2025, by Ward.

Ward	Number of licensed HMOs* (as of 30 Sept 2025)	Potential HMOs** (2024-2025)
Ashford Common	12	5
Ashford East	11	5
Ashford North & Stanwell South	35	21
Ashford Town	18	16
Halliford and Sunbury West	0	1
Laleham and Shepperton Green	4	2
Riverside and Laleham	6	1
Shepperton Town	1	3
Staines	18	4
Staines South	5	4
Stanwell North	18	18
Sunbury Common	18	18
Sunbury East	3	1
<b>Grand Total</b>	<b>149</b>	<b>99</b>
<p>*Note this includes licence renewals that are in the system being processed</p> <p>**This 'Potential HMOs' data has recently been extracted from the EH database for the years shown. The data relates to all service requests and enquiries which indicate the properties might be HMOs. From analysis of the data at this time it is not known if they are HMOs and if so whether need to be licensed. It does not indicate if the allegation has been substantiated.</p>		

- 3.20 The information shows that the highest number of licensed HMOs is within the wards Ashford North & Stanwell South, then Staines, then Ashford Town and then

Stanwell North and Sunbury Common. Ashford Town is the ward with the biggest increase (by 4) of licensed HMOs in the last year. The wards subject to an Article 4 Direction are marked in **green**.

- 3.21 Maps showing the distribution of licensed HMOs throughout Spelthorne and then the distribution of licensed HMOs by ward are included as Appendix 7 to this report. The maps were created in November 2025 based on the information on the number of licensed HMOs as of 30 September 2025.
- 3.22 Environmental Health have noted a continued increase in the number of potential HMOs during the period 1 October 2024 to 30 September 2025. In the last year, the number of potential HMOs has increased from 70 to 99 as can be seen in Table 8 below. This could be as a result of some landlords deciding to create HMOs before August 2025 when the Article 4 declaration across 3 wards came into effect following the decision made at the April 2024 committee meeting, as well as an anticipation from landlords that this would be further extended to the remaining wards, in addition to an increased awareness from residents following the subsequent consultation relating to this. Environmental Health introduced an online "Report It" form to enable residents to report any concerns more easily and it is likely that this has increased the number of reports received.

Table 8 – Showing the comparison between number of potential HMOs brought to the attention of Environmental Health over the last three years by Ward

Ward	Potential HMOs		
	2022-2023	2023-2024	2024-2025
Ashford Common	4	2	5
Ashford East	5	6	5
Ashford North & Stanwell South	0	14	21
Ashford Town	4	6	16
Halliford and Sunbury west	1	1	1
Laleham and Shepperton Green	0	1	2
Riverside and Laleham	1	6	1
Shepperton Town	1	1	3
Staines	1	1	4
Staines South	1	4	4
Stanwell North	4	22	18
Sunbury Common	1	4	18
Sunbury East	0	2	1
<b>Grand Total</b>	<b>23</b>	<b>70</b>	<b>99</b>

- 3.23 Environmental Health have also noted an increase in HMO licence applications, which may also be a result of landlords wanting to establish HMOs in advance of August 2025. In the past year (1 October 2024 to 30 September 2025), we received 115 HMO licence applications, compared to last year where the figure was 77 and in 2022/2023 the number received was 33.

- 3.24 For the period 1 October 2024 to 30 September 2025, Table 9 below provides a summary of the complaints relating to known HMOs received by Environmental Health about matters relating to accumulations of rubbish, antisocial behaviours (ASB), noise, rats, mice and overgrown gardens. It should be noted that there is some overlap of complaints received by Planning and Environmental Health. The complaints included in this data refer to HMOs that are licensed or for which Environmental Health have received a licence application that is pending (whether or not they had at the time of the complaint). The data does not include complaints about properties that were vacant where building works were taking place which may have related to their use changing to become an HMO.

Table 9: Complaints received by Environmental Health about known HMOs between 1 October 2024 and 30 September 2025

Ward	No. of Complaints	No. of Households in Ward	No. of complaints as a % of households	Complaint Type
Ashford Common	7	3565	0.2%	accumulations, noise. ASB, rats
Ashford North and Stanwell South	10 (5 about same property)	3785	0.3%	accumulations. Noise, ASB
Ashford Town	7	3465	0.20%	accumulations
Ashford East	5	3206	0.15%	Rats, accumulations
Laleham and Shepperton Green	2 (both about same property)	3607	0.05%	accumulations
Riverside and Laleham	3	2918	0.1%	Noise, ASB
Halliford and Sunbury West	2	2692	0.07%	Accumulations, noise
Shepperton Town	2	3384	0.05%	Accumulations, noise
Staines	2	5736	0.03%	Accumulations, ASB
Staines South	4	2998	0.13%	Accumulations, ASB
Stanwell North	5 (about same address)	3517	0.14%	Accumulations
Sunbury East	6 (2 about same address)	3372	0.2%	Noise, accumulations,
Sunbury Common	10	3504	0.3%	Accumulations, ASB
<b>Grand Total</b>	<b>65</b>	<b>41805</b>	<b>0.2%</b>	

- 3.25 Table 10 below provides data on the total number of complaints received by Environmental Health relating to residential properties in general (includes HMOs and single occupation properties) about accumulations, ASB, noise, rats and mice



and overgrown gardens. It also shows what percentage of these complaints relate to HMOs.

Table 10: Relevant complaints received by Environmental Health about all residential properties (whether HMOs or properties in single occupation) between 1 October 2024 and 30 September 2025.

Total no. of relevant complaints received	All complaints as a % of households	HMO complaints as a % of households
831	1.98	0.2%

#### **4. Environmental Health controls of HMOs**

- 4.1 Environmental Health have powers under various legislation such as the Environmental Protection Act, the Prevention of Damage by Pests Act and the Anti-social Behaviour, Crime and Policing Act 2014 to deal with noise and other nuisance; accumulations of rubbish; and along with our colleagues in Community Safety, to address complaints about anti-social behaviour (ASB) These powers apply to all residential properties in the Borough including licensed and unlicensed HMOs. There are also requirements under The Management of Houses in Multiple Occupation (England) Regulations 2006 that apply to all HMOs which include such matters as rubbish disposal and untidy gardens as well as conditions within the property.
- 4.2 Additionally, licensed HMOs are subject to programmed inspections to check compliance with relevant legislation and licence conditions relating to fire safety, amenities, and management. These licence conditions include matters that might adversely impact on nearby residents, particularly in relation to anti-social behaviour and accumulations of rubbish.
- 4.3 Spelthorne's HMO licence condition for ASB has recently been revised and strengthened following discussion with our Community Safety team, where it was agreed that HMO landlords should be taking more responsibility to manage anti-social behaviour from the residents of their HMO. A landlord guide to ASB has also been produced and is available on our website. The condition is as follows:
- The Licence Holder must take all reasonable and practicable steps for preventing and dealing effectively with anti-social behaviour (ASB)\* by people occupying or visiting the premises; and for preventing the use of the premises for illegal purposes. These steps must include:
    - **Written contract**  
Ensuring that the tenancy agreement or terms of occupancy contains a clause holding the occupants responsible for any anti-social behaviour by themselves and/or their visitors, and that this clause is drawn to the attention of occupants when they take up residence.

- **Dealing with complaints**

Responding to complaints of anti-social behaviour that concern occupiers of the premises or their visitors. Where anti-social behaviour is discovered, the Licence Holder must inform the tenant responsible in writing of the matter within 2 days and warn them of the consequences of its continuation, which could include eviction. If the ASB continues, the Licence Holder must put further measures in place such as set up an acceptable behaviour contract\*\*.

- **Prohibition of use of outbuildings**

Ensuring that all outhouses, garages, and sheds are kept secured and used for their intended purpose. The Licence Holder must not allow them to be occupied as individual habitable rooms, kitchens, or bathrooms.

*\*ASB is behaviour causing harassment, alarm, or distress to one or more people who are not in the same household as the perpetrator. It covers a wide range of unacceptable behaviour, such as playing loud music, shouting, and screaming, threatening or abusive behaviour, taking/selling drugs, using racist or homophobic language, allowing the build-up of refuse in the property or garden, parking illegally or inappropriately.*

*\*\*For further information, visit the Council's website (<https://www.spelthorne.gov.uk/article/16974/Antisocial-behaviour>) or refer to Spelthorne's landlord guide to ASB.*

#### 4.4 Spelthorne's HMO licence condition for rubbish is as follows:

Ensure that waste bins, which are provided by the Council in line with our bin allocation policy, are made available for all residents of the accommodation. Ensure that suitable refuse bins are provided within the accommodation including within all kitchens. Additional arrangements should be made for the storage and disposal of household waste from the property to ensure compliance with Spelthorne Borough Council's refuse and recycling disposal scheme. For further details about the scheme please go to <https://www.spelthorne.gov.uk/rubbishwasterecycling> or contact Neighbourhood Services on 01784 446411 or email at [neighbourhoodservices@spelthorne.gov.uk](mailto:neighbourhoodservices@spelthorne.gov.uk).

## 5. **New risk-based HMO licensing scheme**

### 5.1 In April 2024, the HMO licensing scheme changed to a risk-based system so that the duration of a new or renewal HMO licence is determined by the landlord's level of compliance, the condition of the property, and the risks posed by the HMO to its occupants and neighbours.

- Landlords who provide well-managed, safe accommodation, to a good standard, will receive a 5-year licence.
- Properties calculated as being medium risk by virtue of confidence in management and the level of property defects found during inspection will receive a 3-year licence.

- Properties calculated as being of high risk will only receive a 1-year licence.
- 5.2 The purpose of the changes to the mandatory scheme is to drive up standards by rewarding compliant landlords with the maximum licence period while those less compliant landlords of HMOs of a poorer standard that take more Council resource (for example by needing to be inspected more frequently), will be granted a shorter licence meaning they pay more.

## **6. Additional HMO Licensing**

- 6.1 Another option (other than Article 4) is to increase the scope of HMOs that would need to be licensed by way of setting up an additional licensing scheme. This would require all HMOs of 3 or more occupants within certain or all areas of the Borough to have a licence from the Council to operate. There however needs to be a strong evidence-based reasoning for invoking the Scheme and it is necessary to demonstrate that other strategies to address the problems have been implemented. The current data we have is not sufficient to warrant making such an application.
- 6.2 Currently only Woking are introducing additional licensing across the whole Borough from 05 January 2026 for five years. The scheme requires all HMO properties with 3 or 4 tenants from 2 or more households to be licensed. No other Surrey authorities have either an additional licensing scheme or an Article 4 direction in place for HMOs, and this includes Runnymede and Guildford who as university boroughs would be expected to have a significantly greater HMO population.

## **7. Consultations**

- 7.1 The following officers have been consulted on the consideration of whether an Article 4 direction should be made in respect of HMOs.

### Strategic Lead • Housing Options

- 7.2 The Council's Group Head of Community Well-being has confirmed that previous comments in the report to committee dated 08 January 2025 still remain relevant. These were as follows:
- 7.3 *"At a time when house prices remain high and access to finance limited, sharing a dwelling with others will continue to be an attractive option. HMOs do fulfil a vital role in providing affordable accommodation for individuals and they are an essential part of the housing stock."*
- 7.4 *The housing benefit system is complex and most people under the age of 35 who do not live with a partner or children, will usually only be able to claim for a single room in a shared house. This is called the Local Housing Allowance shared accommodation rate (SAR), unless they fall in some exceptional categories, such as they are a care leaver, they have previously lived in a homeless hostel for at least 3 months, receiving the care component of Disability Living Allowance or*

*Personal Independence Payment, are victims of domestic abuse or modern slavery, and a few other exceptions.*

- 7.5 SAR limits the amount of housing support available through the benefits system for most single private renters under the age of 35. The SAR was introduced in 1996 and originally limited the Housing Benefit a single person under the age of 25 could receive to the average rent level for a room in a shared house. As part of the October 2010 Spending Review the Government announced the SAR's extension to cover single claimants up to age 35 from April 2012. This change was brought forward to 1 January 2012.*
- 7.6 Universal Credit has been replacing Housing Benefit for working-age households since 2013 and retains the SAR in calculations of housing support.*
- 7.7 In 2017, the Government abandoned plans to use Local Housing Allowance (LHA) to calculate rental support in the social rented sector, so the SAR does not apply to people aged 35 and under renting from a local authority or registered housing association.*
- 7.8 The SAR has been controversial since its introduction. Prior to its extension to the under-35s, draft regulations, an Impact Assessment and an Equality Impact Assessment were published and referred to the Social Security Advisory Committee (SSAC) for consultation. The Impact Assessment said around 20% of the 1-bedroom LHA caseload (at March 2010) would receive, on average, £41 per week less benefit than under the previous rules.*
- 7.9 The extension to under 35s was expected to affect around 63,000 people. Since its introduction, commentators and campaigning organisations have continued to point to shortages of shared rooms available to young benefit claimants, and shortfalls between benefit levels and rent.*
- 7.10 Organisations such as Crisis have been calling for Government to invest in Housing Benefit "so that covers the true cost of rents".*
- 7.11 Due to the financial pressure, HMOs are in high demand and remain the only affordable options on privately rented market to those on housing benefit under the age of 35. However, the cost of rooms in HMO accommodation is also unaffordable for many. Whilst Spelthorne does not have enough of HMOs to meet the demand, at the same time many people do not want to share due to the poor quality of HMOs, even if they can't afford to cover the rent, despite support given by Rentstart. Nevertheless, the Strategic Lead, Housing Options advises that whilst HMOs are not the first choice for those looking for housing, given there is a lack of housing options and given we are experiencing a housing crisis, Housing Options would definitely not want to lose HMOs as an option. HMOs are helpful and numerous placements are made with the help of our Rentstart colleagues every month".*

#### Neighbourhood Services

- 7.12 The Neighbourhood Services Department has made the following comments:*

- 7.13 *"The Environmental Health service works closely with Neighbourhood Services to ensure effective waste management for Houses in Multiple Occupation (HMOs). HMOs are treated as single dwellings for domestic waste purposes and are provided with one 240-litre rubbish bin and one 240-litre recycling bin, both collected fortnightly, along with a weekly curbside food waste bin. Where this provision is insufficient, landlords are required to arrange a commercial waste collection service to manage the additional waste, which operates alongside the Council's domestic collection. The Council offers its own commercial waste service through SDS Ltd, though landlords are free to choose any licensed operator. In practice, Neighbourhood Services may share SDS's details with landlords or, at the landlord's request, pass their information to SDS for direct contact. Currently, around a dozen HMOs make use of SDS Ltd's commercial waste service".*

#### Community Safety Manager

- 7.14 The Council's Community Safety Manager has been consulted and has confirmed that their comments presented in the Committee report on 08 January 2025, still also remain relevant. The comments were as follows:

*"Spelthorne Borough Council's Community Safety Team does manage a range of complaints regarding HMOs. While it is true that the complaints are not disproportionately high in relation to other complaints of anti-social behaviour, the nature of the complaints can often be complicated, particularly in HMOs where there is a short-term occupancy and a high turnover of tenants. It has been found that many of the total complaints in relation to HMOs relate to a small number of venues. Persistent re-offending is common in cases such as these. The Community Safety Team manages anti-social behaviour in partnership with other statutory partners under the Crime & Disorder Act 1998. When managed by the police, the full range of criminal law can be utilised. Often, cases are managed by the Community Safety Team by either warning or prosecuting offenders under S.43 Anti-Social Behaviour, Crime & Policing Act 2014. This allows authorised officers to issue a 'Warning Notice' to rectify behaviour that is having a detrimental effect, of a persistent or continuing nature, on the quality of life of those in the locality. Failure to comply with the warning will lead to the issue of a Community Protection Notice that places conditions on the suspected party. If these conditions are not met, the Community Safety Team will prosecute. This method has been used on both landlords and tenants alike and is generally successful.*

*What has been noticed, however, is the lack of responsibility of some landlords when managing anti-social behaviour within their own HMO. It is clear in some cases that the landlord feels that they can solely rely on public services without the need to take remedial action in the first instance. This attitude often leads to an increase in anti-social behaviour as can be evidenced in some local cases. It has been found that some landlords appear to extricate themselves from such responsibilities. Good examples of landlord management include ASB clauses within tenancy agreements, posted acceptable conduct notices and expedient action to tackle ASB".*

### Consultation on the Article 4 Direction made for the ten wards

- 7.15 In accordance with statutory procedures, consultation was undertaken following the making of the Article 4 Direction on 05 March 2025 for the wards of Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East. Site notices advertising the Article 4 Direction were placed in each ward, and the Article 4 Direction was displayed at the Council Offices and on the Council's website. A total of two letters of representation were received during the consultation process. These letters are attached **Appendix 1** to this report with personal details redacted.
- 7.16 The main issues raised in the letters of support for the creation of an Article 4 Direction are summarised as
- The Article 4 Direction should cover the whole of Spelthorne.
  - Numerous HMOs are popping up.
  - Concerns over the HMO construction process.
  - HMO's have resulted in criminal and anti-social behaviour
  - Parking concerns.
  - Concerns over the wait to bring in the Article 4 Direction.
- 7.17 Members of the Planning Committee are required, having regard to the comments above, to make a decision on whether or not to confirm the Article 4 Direction made in March 2025 in respect of Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East Wards.

## **8. Options for Article 4 Direction**

### Article 4 Direction Made in March 2025

- 8.1 **(i) To confirm the existing Article 4 Direction made in March 2025 in respect of the Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East wards.**
- 8.2 **(ii) To not confirm the existing Article 4 Direction made in March 2025 in respect of the Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West, Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East wards, and to continue to monitor HMOs and to review if the position changes within one year (December 2026)**

### Commentary

- 8.3 At planning committee on 08 January 2025, members resolved to serve an Article 4 Direction on the ten remaining wards in Spelthorne, not already covered by the first Article 4 Direction that came into effect on 29 August 2025. The purpose of the direction would be to remove the permitted development right to convert a dwelling house into a small HMO occupied between 3 and 6 individuals. As required by Schedule 3 of the *Town and Country Planning (General Permitted Development) Order 2015 (as amended)*, the Local Planning Authority in deciding whether to confirm a direction made under Article 4, must take into account any representations received during the specified consultation period. These have been included at **Appendix 1**.
- 8.4 This report has also presented an additional year of data to that provided by the Council's Planning, Planning Enforcement, and Environmental Health Teams in the report presented before Planning Committee on 08 January 2025, during which members resolved to make the Article 4 Direction.
- 8.5 Members must determine whether to confirm the Article 4 Direction. In the event that it is not confirmed a further year's data will be reported to Planning Committee in December 2026.

## **9. Financial Management Comments**

- 9.1 An introduction of an Article 4 Direction with immediate effect would have financial implications associated with the (a) for abortive expenditure (such as expenditure incurred in the preparation of plans); and, (b) for depreciation of land value where the loss is directly attributable to the removal of permitted development rights – this would include loss of future profit.
- 9.2 The work associated with the confirmation an Article 4 Direction include site notices and notification. This involves mainly resources from Planning Development Management (PDM) and Legal Services.
- 9.3 There will also be additional resource implications for PDM associated with an increase in planning applications if an Article 4 Direction was confirmed for small HMOs (for 3 – 6 occupants which currently do not need planning permission). It is not known how many additional planning applications will be received as a result of serving a borough wide Article 4 Direction. Table 7 above shows the number of potential HMOs that have come to the attention of Environmental Health (EH) through complaints and enquiries. This totals 99 for the past year. However, an HMO licence through EH is only needed for 5+ occupants whereas an Article 4 HMO would require any HMO with 3 – 6 occupants to submit an application.
- 9.4 There would be further resource implications for PDM enforcement officers. The number of complaints / investigations relating to a property being occupied by three or more tenants from different households with shared facilities across the borough, which has a total of 41,805 households (2021 census), is potentially enormous. The planning enforcement officers (of which there are three 3(fte) are already stretched by dealing with close to 400 complaints a year, some of which are very complex cases.

## **10. Risk Management comments**

- 10.1 There are risk management considerations associated with an Article 4 Direction including financial risks and possible judicial review proceeding (see legal comments below).

## **11. Procurement Comments**

- 11.1 There are no procurement issues.

## **12. Legal Comments**

- 12.1 The decision of the LPA to make an Article 4 Direction can be subject to judicial review proceedings. If the proceedings are successful, the Article 4 Direction could be quashed.
- 12.2 Judicial review is the procedure by which the courts examine the decisions of public bodies to ensure that they act lawfully and fairly. On the application of a party with sufficient interest in the case, the court conducts a review of the process by which a public body has reached a decision to assess whether it was validly made.
- 12.3 A claim for judicial review can be made on the following grounds:

### **12.3.1 Illegality**

Illegality arises when a decision-maker:

- Misdirects itself in law.
- Exercises a power wrongly.
- Acts [ultra vires](#), in purporting to exercise a power that it does not have.

### **12.3.2 Irrationality**

A decision may be challenged as irrational, if:

- It is outside the range of reasonable responses of a public authority (this is sometimes phrased as being "so unreasonable that no reasonable authority could ever have come to it", using the standard of [Wednesbury unreasonableness](#)). The courts are very reluctant to find that a decision was irrational, particularly where the decision-maker is an expert.
- The decision-maker took into account irrelevant matters or failed to consider relevant matters.

### **12.3.3 Procedural unfairness**

This ground arises, if the decision-maker has not properly observed:

- The relevant statutory procedures, such as a failure to consult or to give reasons.
- The principles of natural justice in the decision-making process (for example, if the decision-maker has shown bias or has failed to hear an affected party).

### **12.3.4 Legitimate expectation**



A public body may, by its own statements or conduct, be required to act in a certain way, where there is a legitimate expectation as to the way in which it will act.

- 12.4 Accordingly, to make sure that the Council is not exposed to any possible judicial review challenges it is critical that a decision on making an Article 4 Direction not only complies with any legal requirements but is also based on strong and robust evidence so that the authority is able to defend and justify making such decision.

### **13. Other Considerations**

- 13.1 There are no other considerations.

### **14. Equality and Diversity**

- 14.1 The Public Sector Equality Duty was created by the Equality Act 2010 in order to harmonise the previous race, disability and gender equality duties and to extend protection to the protected characteristics of age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. In summary, the Council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

- 14.2 Having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

- 14.3 The Council's Corporate Plan and Equality Diversity and Inclusion Statement of Intent provide an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.

### **15. Sustainability/Climate Change Implications**

- 15.1 There are no sustainability/climate change issues.

### **16. Timetable for implementation**

- 16.1 It is recommended that committee either:

- Confirm the existing Article 4 Direction made in March 2025 in respect of the Ashford Common, Ashford East, Ashford Town, Halliford and Sunbury West,

Laleham and Shepperton Green, Riverside and Laleham, Shepperton Town, Staines South, Sunbury Common, and Sunbury East wards. This would come into effect on 13 March 2026.

- Not confirm the Article 4 Direction and continue to monitor the number of investigations relating to HMOs which are permitted development in the ten remaining wards and to bring back a further report to the Planning Committee by December 2026

## **17. Contact**

- 17.1 For any queries regarding the Planning Enforcement aspect of HMOs, please contact Richard Jones, Planning Enforcement Team Leader on [r.jones@spelthorne.gov.uk](mailto:r.jones@spelthorne.gov.uk)
- 17.2 For Planning matters, please contact Simon Rowberry, Planning Development Manager on [S.Rowberry@spelthorne.gov.uk](mailto:S.Rowberry@spelthorne.gov.uk) [mailto:](#)
- 17.3 For queries relating to Environmental Health, please contact Fidelma Bahoshy, Joint Senior Environmental Health Manager or Susan Turp, Principal Environmental Health Officer on [s.turp@spelthorne.gov.uk](mailto:s.turp@spelthorne.gov.uk)  
[f.bahoshy@spelthorne.gov.uk](mailto:f.bahoshy@spelthorne.gov.uk)

## **18. Appendices:**

Appendix 1 – Representations received during consultation period

Appendix 2 - Ward Map of investigations of HMOs which did not require planning permission 2024 – 2025

Appendix 3 - Table of HMO planning applications determined 2024 - 2025

Appendix 4 - Planning Applications approved by ward 2024 - 2025

Appendix 5 - Planning Applications refused by ward 2024 – 2025

Appendix 6 - Ward Map of investigations of HMOs which did not require planning permission 2019 – 2025

Appendix 7 - Maps showing distribution of licensed HMOs by ward\*

Appendix 8 – Report to Committee 09 December 2024

*\*based on data collected on licensed HMOs in Nov 2025*