

# EXECUTIVE

Thursday, 4th April, 2024  
6.30 pm





# EXECUTIVE

## ROOMS 2 & 3, BURNLEY TOWN HALL

Thursday, 4th April, 2024 at 6.30 pm

This agenda gives notice of items to be considered in private as required by Regulations (4) and (5) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

Members are reminded that if they have detailed questions on individual reports, they are advised to contact the report authors in advance of the meeting.

Members of the public may ask a question, make a statement, or present a petition relating to any agenda item or any matter falling within the remit of the committee.

Notice in writing of the subject matter must be given to the Head of Legal & Democracy by 5.00pm on the day before the meeting. Forms can be obtained for this purpose from the reception desk at Burnley Town Hall, Manchester Road or at the Contact Centre, Parker Lane, Burnley or from the web at: [Request to Speak form](#) . You can also register to speak via the online agenda. Requests will be dealt with in the order in which they are received.

There is limited space to accommodate members of the public. You are advised to contact [democracy@burnley.gov.uk](mailto:democracy@burnley.gov.uk) in advance of the meeting.

## **AGENDA**

### **1) *Apologies***

To receive any apologies for absence.

### **2) *Minutes***

5 - 10

To approve as a correct record the Minutes of the last meeting.

### **3) *Additional Items of Business***

To determine whether there are any additional items of business which, by reason of special circumstances, the Chair decides should be considered at the meeting as a matter of urgency.

### **4) *Declaration of Interest***

In accordance with the Regulations, Members are required to declare any personal or personal and prejudicial interests they may have and the

nature of those interests in respect of items on this agenda and/or indicate if S106 of the Local Government Finance Act 1992 applies to them.

**5) Exclusion of the Public**

To determine during which items, if any, the public are to be excluded from the meeting.

**6) Right To Speak**

To consider questions, statements or petitions from Members of the Public

**7) Urgent Executive Decision - Local Authority Housing Fund - Temporary Accommodation** 11 - 18

To note the urgent decision taken by the Chief Executive.

**8) Article 4 Direction - Houses in Multiple Occupation** 19 - 38

To receive an update on consultation carried out, and consider granting approval to confirm the proposed Article 4 Direction.

**9) Additional Local Authority Housing Fund Round 3 (LAHF R3) for Temporary Accommodation** 39 - 42

To consider granting approval to accept an additional £134,800 from the Department for Levelling Up, Housing and Communities ('DLUHC') to deliver a further two homes for continued use as temporary accommodation.

**MEMBERSHIP OF COMMITTEE**

Councillor Afrasiab Anwar (Chair)  
Councillor Margaret Lishman (Vice-Chair)  
Councillor Howard Baker

Councillor Scott Cunliffe  
Councillor Lubna Khan  
Councillor Jack Launer

**PUBLISHED**

Monday, 25 March 2024

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## EXECUTIVE

BURNLEY TOWN HALL

Wednesday, 13th March, 2024 at 6.30 pm

### PRESENT

### MEMBERS

Councillors A Anwar (Chair), M Lishman (Vice-Chair), H Baker, S Cunliffe and J Launer

### OFFICERS

Rob Dobson	– Chief Operating Officer
Paul Gatrell	– Head of Housing & Development Control
Carol Eddleston	– Democracy Officer

### ALSO IN ATTENDANCE

Councillor J Harbour

#### 89. Apologies

Apologies for absence were submitted on behalf of Councillor Lubna Khan and Chief Executive Lukman Patel.

#### 90. Minutes

The minutes of the last meeting, held on 15<sup>th</sup> February 2024, were approved as a correct record and signed by the Chair.

#### 91. Additional Items of Business

There were no additional items of business.

#### 92. Declarations of Interest

Councillors Afrasiab Anwar and Howard Baker declared a prejudicial interest in Minute 98 [agenda item 10] Selective Licensing – Consultation on Future Proposals. They indicated that they would leave the meeting for the duration of the item in accordance with the Code of Conduct for Members.

### **93. Exclusion of the Public**

Exclusion of press and public was as set out in the agenda.

### **94. Right To Speak**

No questions, statements or petitions had been received from members of the public or elected members.

### **95. Executive Appointments to PATROL Joint Committee and Town Board**

PURPOSE:

1. To amend Executive Member representation on the Parking and Traffic Regulations Outside London (PATROL) Joint Committee.
2. To agree Executive Member appointments to the Town Board.

REASONS FOR DECISION:

1. The Council's appointment to the Parking and Traffic Regulations Outside London (PATROL) Joint Committee needs to be amended to reflect recent changes to the Executive.
2. On 27<sup>th</sup> February 2024 Full Council approved the addition of the Town Board to the Council's list of Outside Bodies. Whilst it falls to Full Council to appoint the Opposition Member to the Board, it falls to the Executive to appoint its representatives.

DECISION:

The Executive resolved to:

1. Appoint Councillor Howard Baker, as Executive Member for Community and Environmental Services, as Burnley Borough Council's representative on the Parking and Traffic Regulations Outside London (PATROL) Joint Committee.
2. Appoint Councillor Afrasiab Anwar, as Leader, and Councillor Scott Cunliffe, as Executive Member for Sustainable Development and Growth, as the Executive Member representatives on the Town Board.

### **96. The Borough's Cultural Framework 2023-27**

PURPOSE:

To seek endorsement of the Cultural Framework (Appendix 1).

REASON FOR DECISION:

To commit the council to an agenda for cultural strategy development which is shared by all local stakeholders.

DECISION:

The Executive resolved to endorse the framework and associated action plans.

## **97. Road Map to Net Zero**

PURPOSE:

To enable the Council to meet its aim of minimising the carbon impact of its business operations.

REASONS FOR DECISION:

1. To ensure Members have access to relevant information to assist them to prioritise actions and resources to minimise the carbon impact of the Council's business operations.
2. To enable Members to plan the Council's Road Map to Net Zero.

DECISION:

The Executive resolved to approve the Road Map to Net Zero Report as a working document to be reviewed and updated periodically (Appendices A and B).

## **98. Selective Licensing - Consultation on Future Proposals**

Councillors Afrasiab Anwar and Howard Baker left the meeting at this point.

PURPOSE:

1. To approve the consultation and evidence gathering for the proposal to designate six areas for selective licensing. The draft case proposal document (attached as Appendix 1) sets out the Council's reasons for proposing to designate the below areas for Selective Licensing. The draft proposed designation area maps and street lists are attached as appendices.
  - a. Trinity (Appendices 2 and 3)
  - b. Queensgate (Appendices 4 and 5)
  - c. Gannow (Appendices 6 and 7)
  - d. Daneshouse and Stoneyholme (Appendices 8 and 9)
  - e. Padiham (Appendices 10 and 11)
  - f. Lyndhurst Road Area (Appendices 12 and 13)
2. To approve the proposed Fee and Charging Structure for consultation. (Appendix 14).
3. To approve the proposed Staffing Structure for consultation. (Appendix 15).

REASONS FOR DECISION:

1. To enable the statutory consultation of residents, landlords and stakeholders in the proposed areas.
2. To ensure the consultation includes a proposed fee structure, proposal documents and agreed proposed boundaries and consultation area to assist in the delivery and analysis of the statutory consultation.
3. To enable any issues to be addressed and evaluated before presenting the final proposal for the proposed selective licensing areas to the Executive Committee in August 2024.

**DECISION:**

The Executive resolved to:

1. Approve the carrying out of consultation in relation to the following areas proposed for selective licensing:

- a. Trinity
- b. Queensgate
- c. Gannow
- d. Daneshouse and Stoneyholme
- e. Padiham
- f. Lyndhurst Road Area

2. Authorise the Head of Housing and Development Control:

- a. To approve for consultation the final proposed fee structure, staffing structure, case proposal document, proposed designation boundaries and areas for consultation, dates for consultation, Fit and Proper Person Criteria and Licence Conditions; *and*
- b. To carry out consultation in relation to those areas proposed for selective licensing (authorising such officers for that purpose as may be necessary).

3. Approve the appointment of a Project Assistant at Grade 8 (subject to ongoing Job Evaluation) for the period April 2024 to January 2025.

4. Approve the in principle upfront payment for statutory notices of designation in local newspapers, should the schemes be approved by the Secretary of State.

**99. Exclusion of the Public**

Councillors Afrasiab Anwar and Howard Baker returned to the meeting.

Members determined to exclude the public from the meeting before discussion took place on Minute 100 [agenda item 12] Disabled Facilities Grant – Social Care Capital Projects on the grounds that in view of the nature of the business to be transacted if the public were present there would be a disclosure to them of exempt information within the meaning of Schedule 12A of the Local Government Act 1972.



## 100. Disabled Facilities Grant - Social Care Capital Projects

### PURPOSE:

To seek approval to utilise Disabled Facilities Grant on two identified social care capital projects.

### REASON FOR DECISION:

To provide first class facilities and services for disabled residents and visitors to the borough.

### DECISION:

The Executive resolved to:

1. Approve the use of Disabled Facilities Grant as detailed in this report to support the provision of a new footbridge and passenger lifts at Manchester Road Railway Station for the benefit of residents and visitors to Burnley.
2. Approve the use of Disabled Facilities Grant as detailed in this report to support the installation of a Changing Places Toilet and create a new disabled access (integrated platform lift) to Towneley Hall through the main entrance to improve access and enhance the visitor experience for residents and visitors.

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# URGENT OFFICER DECISIONS- EXECUTIVE DECISIONS

Thursday, 7th March, 2024  
10.00 am





# URGENT OFFICER DECISIONS- EXECUTIVE DECISIONS

Thursday, 7th March, 2024 at 10.00 am

## AGENDA

1) *Local Authority Housing Fund (LAHF) for Temporary Accommodation* 3 - 8

PUBLISHED

7<sup>th</sup> March 2024



## URGENT EXECUTIVE DELEGATED DECISION BY THE CHIEF EXECUTIVE

BURNLEY TOWN HALL

### PRESENT

**OFFICERS** Carol Eddleston - Democracy Officer

<b>2. Local Authority Housing Fund (LAHF) for Temporary Accommodation</b>
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#### Purpose:

To seek approval to accept the additional funding from the Home Office to deliver a further three homes for continued use as temporary accommodation for general housing needs purposes.

#### Reasons for Decision:

1. To reduce the ongoing revenue cost of temporary accommodation as the Council will no longer pay the annual lease cost to the property owners.
2. To have control of the temporary accommodation to ensure the properties are maintained to a good standard, well managed for homeless families and remain in use as temporary accommodation for as long as the Council determines there is a need.
3. To increase the number of Council owned temporary accommodation properties by three taking the total to twenty including the six from the Rough Sleeping Accommodation.

#### Decision:

That the Chief Executive using urgency powers under Part 3 of the Constitution (Executive Functions), and following consultation with the Executive Member, delegate authority to the Head of Legal & Democratic Services to agree and sign the addendum to the Council's existing MOU with the Home Office to deliver the additional funding from the Local Authority Housing Fund 23-24 for the purposes of acquiring a further three empty properties to use as temporary accommodation for general housing needs.

In accordance with, and following the requirements set out in Paragraph 16 of Part 4.2 of the Constitution regarding the agreement of the Chair of the Scrutiny Committee, it is stated that in the opinion of the Chief Executive, this decision is an urgent one to ensure that external funding is secured and is therefore not subject to call-in.

Decision made by: Lukman Patel, Chief Executive

Date: 7<sup>th</sup> March 2024

Decision published on: 7<sup>th</sup> March 2024

**URGENT DECISION BY THE CHIEF EXECUTIVE OFFICER**



<b>DATE</b>	<b>5.03.24</b>
<b>PORTFOLIO</b>	<b>Housing &amp; Development Control</b>
<b>REPORT AUTHOR</b>	<b>Wilma Waddingham</b>
<b>TEL NO</b>	<b>01282 477242</b>
<b>EMAIL</b>	<a href="mailto:wwaddingham@burnley.gov.uk"><u>wwaddingham@burnley.gov.uk</u></a>

**Additional Local Authority Housing Fund (LAHF) for Temporary Accommodation**

**PURPOSE**

1. To seek approval to accept the additional £201,000 from the Home Office do deliver a further three homes for continued use as temporary accommodation for general housing needs purposes.

**RECOMMENDATION**

2. It is recommended that the Chief Executive using urgency powers under Part 3 of the Constitution (Executive Functions) agrees to:
3. Endorse this report
4. Delegate authority to the Head of Legal & Democracy Services to agree and sign the addendum to the Council's existing MOU with the Home Office to deliver the additional funding from the Local Authority Housing Fund 23-24 for the purposes of acquiring a further three empty properties to use as temporary accommodation for general housing needs.
5. That call in be waived by the Executive following agreement with the Chair of Scrutiny due to the urgency of this decision to ensure the Council receive the Home Office funding.

**REASONS FOR RECOMMENDATION**

6. To reduce the ongoing revenue cost of temporary accommodation as the Council will no longer pay the annual lease cost to the property owners.
7. To have control of the temporary accommodation to ensure the properties are maintained to a good standard, well managed for homeless families and remain in use as temporary accommodation for as long as the Council determines there is a need.

8. To increase the number of Council owned temporary accommodation properties by three taking the total to twenty including the six from the Rough Sleeping Accommodation.

## **SUMMARY OF KEY POINTS**

9. As a result of the Covid 19 pandemic and the Governments instruction of “everyone in”, the Council rapidly secured additional temporary accommodation through lease agreements with accredited private landlords. Following the Pandemic, the properties continue to be in high demand for temporary accommodation from families requesting assistance under the Council’s statutory homelessness duties.
10. Homelessness legislations states that families should not be accommodated in B&B accommodation, or if this proves unavoidable, should be housed there for no more than 6 weeks. To achieve this objective, it has been necessary to increase the number of family properties the Council has available for homeless households.
11. To meet the increasing demand for family accommodation the Council has extended the leases on the properties from accredited landlords. This has been successful, and fewer families have been placed into B&B accommodation.
12. To support Councils the Home Office implemented a Local Authority Fund 23-24, allocating initial funding and inviting each local authority to submit a validation form. Burnley received an initial capital allocation of £469,000 to deliver 6 homes. To date the Council have delivered 2 of these homes with the remaining 4 completing by the end of March/April 2024.
13. In January 2024 the Home Office invited further expressions of interest for additional LAHF funding that may become available. Further funding has become available, and the Council were informed on the 29<sup>th</sup> February 2024 that they have been awarded a further £201,000 to deliver an additional three homes by August 2024 to use as temporary accommodation for general housing needs.
14. The additional three homes can be delivered through the empty homes project but funded through LHAF and the Council’s Asylum Seekers Fund.
15. To receive this additional funding the addendum to the MOU requires signing and returning to the Home Office by the 11<sup>th</sup> March 2024.

## **FINANCIAL IMPLICATIONS AND BUDGET PROVISION**

16. It is estimated from the current market valuations that the cost to acquire and renovate the three additional homes will be £270,000. These properties will be funded through the



Home Office Local Funding 23-24 of £201,000 and the remaining from the Council's Asylum Seekers Fund.

#### **POLICY IMPLICATIONS**

17. There are no direct policy implications. This scheme will be delivered within the Councils existing policy framework which supports the Prevention of Homelessness Strategy.

#### **DETAILS OF CONSULTATION**

18. Councillor Gail Barton, Chair of Scrutiny

#### **BACKGROUND PAPERS**

19. None

#### **FURTHER INFORMATION**

**PLEASE CONTACT:**

**Wilma Waddingham 01282 477242**

**ALSO:**

**Clare Jackson 01282 477231**

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## ARTICLE 4 DIRECTION: HOUSES IN MULTIPLE OCCUPATION (HMOs)

### REPORT TO THE EXECUTIVE



<b>DATE</b>	<b>4<sup>th</sup> April 2024</b>
<b>PORTFOLIO</b>	<b>Sustainable Development and Growth</b>
<b>REPORT AUTHOR</b>	<b>Pete Milward</b>
<b>TEL NO</b>	<b>Ext. 3296</b>
<b>EMAIL</b>	<a href="mailto:pmilward@burnley.gov.uk">pmilward@burnley.gov.uk</a>

### PURPOSE

1. The purpose of this report is to:
  - Update the Executive with the results of the consultation on the proposed Article 4 Direction, undertaken in October/November 2023; and
  - Seek Executive approval to confirm the Article 4 Direction which will remove the permitted development rights for the change of use from Use Class C3 (dwellinghouses) to Use Class C4 (Houses of Multiple Occupation (HMO) in the nine wards of the Borough, as illustrated on the plan accompanying the Direction. If confirmed, the Direction will become effective on 14 October 2024.

### RECOMMENDATION

2. It is recommended that the Executive:
  - i) approve the confirming of a non-immediate Article 4 direction to remove permitted development rights for changes of use from individual dwellinghouses to smaller houses in multiple occupation in line with the procedure set out in paragraph 16.
  - ii) authorise the Director of Economy and Development to prepare the necessary documentation and carry out the notification of the confirmation as required by the Regulations and set out in paragraph 16.

### REASONS FOR RECOMMENDATION

3. The Houses in Multiple Occupation and Small Flats SPD (2022) highlighted that, should the need arise, the Council could consider an Article 4 direction to better manage the creation of small HMOs and their impacts on the amenity of certain areas. The background report appended to the previous Executive report on 20 September 2023<sup>1</sup> demonstrated the need to introduce an Article 4 direction.

<sup>1</sup> Executive meeting 20<sup>th</sup> September 2023. Minute 40  
<https://burnley.moderngov.co.uk/documents/g3405/Printed%20minutes%2020th-Sep-2023%2018.30%20Executive.pdf?T=1>

## SUMMARY OF KEY POINTS

### Background

4. The [background report](#) appended to the Executive Report on 20 September 2023 outlined the extent of current houses in multiple occupation (HMOs) in the borough; the current legislative and policy position in respect of HMOs; the justification for introducing a non-immediate Article 4 direction to remove the permitted development rights that allow the conversion of a single dwellinghouse into a small house in multiple occupation; and the process for doing so.

### Making of, and Consultation on, the Article 4 Direction

5. On 20 September 2023, the Executive approved the making of the Article 4 Direction and the accompanying public consultation. The Direction was 'made' on 13th October 2023, triggering the commencement of the 12-month lead in period required to introduce non-immediate Directions. A copy of the ['made' direction and accompanying map](#) is available on the Council's Website.
6. A 6-week public consultation subsequently took place between Friday 13 October and Friday 24 November 2023. Consultation and publicity were undertaken in accordance with the requirements of Schedule 3 of the GPDO 2015, and included:
  - Notification to the Secretary of State
  - Press notice in Burnley Express
  - Approximately 20 Site Notices displayed across the wards included within the Article 4 boundary
  - Information on the Council website
  - Information 'on deposit' at the Contact Centre and Burnley and Padiham Libraries
  - Press release
  - Email and postal notification to statutory undertakers and selected consultees from the Local Plan consultation database

### Results of Consultation

7. The Council received 21 comments, which are presented in the accompanying Consultation Report at Appendix A The Consultation Report details how the Council have considered each of the comments received, and what action, if any, is recommended as a result.
8. Of the 21 comments received, 18 either raised no comment or gave support for the introduction of the direction, 1 supported the direction but considered that the area covered by the direction should be enlarged, and 2 objected to the introduction of the direction.
9. It is considered that no changes are required to the Direction and it can proceed to be confirmed as originally proposed, without amendment.

### Confirmation of the Direction

10. It is therefore recommended, as at paragraph 2, that the Executive approve the confirmation of a non-immediate Direction under Article 4 of the Town and Country

Planning (General Permitted Development) Order (GPDO) 2015 (as amended) to remove the permitted development rights granted by Schedule 2 Part 3 Class L(b) of that Order, which allows a change of use from a dwellinghouse (C3) to a house in multiple occupation with between 3 and 6 occupants (C4), and which will apply to the wards of the borough as listed below:

- Trinity ward;
- Bank Hall ward;
- Daneshouse with Stoneyholme ward;
- Rosegrove with Lowerhouse;
- Gannow ward;
- Gawthorpe ward;
- Queensgate ward;
- Brunshaw ward; and
- Rosehill with Burnley Wood ward

11. The full rationale and key issues to support the confirmation of the direction are as presented and detailed in the earlier Background Report and summarised in Executive Report, dated 20 September 2023.
12. Based on the above and the consideration of the comments received, it is considered that the introduction of a new Article 4 Direction, to cover the wards identified, will give the Council more effective planning control to restrict the otherwise unregulated conversion of dwellinghouses to HMOs. It is expected that such interventions can seek to help rebalance communities and address the cumulative and detrimental impacts of HMOs on the Borough and local amenity.

### **Procedure and Powers for Making an Article 4 Direction**

13. Whilst the Council can confirm all Article 4 Directions, the Secretary of State (SoS) must be notified at both the preliminary ('making the notice') and final ('confirming the notice') stages.
14. The SoS was notified of the making of the Direction on 13 October 2023, with the intent that the non-immediate Direction should then take effect 12 months later (from 14 October 2024). The response received was as follows: *"We will only contact you if any additional information is required and you should continue with any processes associated with introducing the Article 4 direction. An Article 4 direction does not require the approval of the Secretary of State in order to come into force, however, please note that the Secretary of State has the power to modify or cancel an Article 4 direction at any time before or after it is confirmed. The Secretary of State will only intervene when there are clear reasons for doing so."* No additional information has been requested to date.
15. It is therefore considered appropriate to continue to progress with the confirmation of the direction. However, continuation does carry a minor risk of modification or cancellation of the direction, should the SoS subsequently decide to intervene. Recent interventions elsewhere by the SoS has resulted in modifications of Directions, rather than cancellations.

## Next Steps

16. Should Executive approve the confirming of a non-immediate Article 4 direction, the timeline thereafter would be as follows:
- April 2024: The Article 4 will be confirmed. The Council then must, as soon as practicable after a direction has been confirmed:
    - (a) give notice of such confirmation and the date on which the direction will come into force; and
    - (b) send a copy of the direction as confirmed to the Secretary of State.
  - 14 October 2024: The Article 4 direction comes into force.

## FINANCIAL IMPLICATIONS AND BUDGET PROVISION

17. The limited costs associated with making, consulting on, confirming and monitoring, if approved, the Article 4 direction will be met within existing budgets. A non-immediate Article 4 direction as recommended giving 12 months' notice, avoids the potential for compensation claims from owners and developers as a result of abortive works.
18. When the Article 4 Direction comes into force, the Council is likely to receive an increased number of Change of Use applications which in turn may lead to planning appeals; and there may be an increase in enforcement activity. The Council will receive income from planning application fees towards meeting these additional costs.

## POLICY IMPLICATIONS

19. When in force, the Article 4 Direction will require planning applications to be submitted which will then be considered with regard to Burnley's Local Plan and the Houses in Multiple Occupation and Small Flats Supplementary Planning Document; and any other material planning considerations.

## DETAILS OF CONSULTATION

20. None

## BACKGROUND PAPERS

21. [Article 4 Direction: Houses in Multiple Occupation \(HMOs\): Report to Executive, 20 September 2023](#)  
[Background Document: Article 4 Direction for the removal of permitted development rights for the change of use from Use Class C3 \(dwellinghouses\) to C4 Houses in Multiple Occupation \(HMOs\) October 2023](#)  
[Burnley-Council-HMO-Article-4-Direction-Made-October-2023.pdf](#)

## FURTHER INFORMATION

<b>PLEASE CONTACT:</b>	<b>Pete Milward</b>
<b>ALSO:</b>	<b>Elizabeth Murphy</b>



## Consultation Report:

Article 4 Direction for the removal of permitted development rights for the change of use from Use Class C3 (dwellinghouses) to C4 Houses in Multiple Occupation (HMOs)

Draft for Executive: April 2024

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**Contact:**

Policy & Environment  
Development and Growth  
Town Hall  
Burnley  
BB11 9SA

E-mail: [localplan@burnley.go.uk](mailto:localplan@burnley.go.uk)



# 1 Consultation and Publicity

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1.1 The Council are proposing to introduce a new non-immediate Article 4 Direction to remove permitted development rights relating to the change of use from a dwellinghouse (Use Class C3) to a House of Multiple Occupation (HMO) (Use Class C4).

1.2 Introducing a non-immediate Article 4 Direction is a two-stage process, first to 'make' and then 'confirm' the direction. The first stage of 'making' the Direction involves the Council carrying out local consultation within the areas where the proposed Direction will take effect. This provides the opportunity for stakeholder groups, local residents, property owners and property agents to make comments on the proposed Direction. In addition to this local consultation the Council is also required to notify the Secretary of State of the proposal.

1.3 The Council's Executive confirmed their approval for the 'making' of the Direction, and the subsequent consultation period, at its meeting on 20 September 2023.

1.4 The Article 4 Direction was 'made' on the 13 October 2023. In accordance with legislative requirements, the Secretary of State was notified of the Direction on the same day (via email notification). The following publicity and consultation then followed:

- Press notice – published in the 'Burnley Express' on 13 October 2023;
- Site notices – over 20 site notices were displayed across the Borough (typically 2-3 notices in each ward within the Article 4 Boundary). They were posted 13-16 October 2023, and then, in accordance with requirements, re-checked during the consultation period to ensure the notices had not been taken down or de-faced. Details of the Site Notice locations is included in Appendix A;
- On deposit – All materials, including the Direction and accompanying maps of the proposed Direction area, the Notice of Direction and the Background Report were placed 'on-deposit' at the Council's Contact Burnley Offices and Burnley and Padiham Libraries;
- Council Website – All materials, including the Direction and accompanying maps of the proposed Direction area, the Notice of Direction and the Background Report were available on the Council website at: <https://burnley.gov.uk/planning/planning-permission/do-i-need-planning-permission/article4/article-4-direction-houses-in-multiple-occupation/>;
- Email and Letter Notifications - were sent to: the Crown and Statutory Undertakers, statutory consultees, general and public consultees (selected from the Local Plan database); and
- Press release – released to local media. Included by the Burnley Express on 13 October 2023 (<https://www.burnleyexpress.net/news/people/consultation-on-proposals-to-tighten-hmo-rules-gets-underway-in-burnley-4370945>).

1.5 Consultation was open for a 6-week period from Friday 13 October 2022 to Friday 24 November 2023. Views were invited by post or email.

## **2 Consideration of all comments received through the consultation**

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2.1 The Council must consider all comments received during the consultation. A total of 21 comments were received through the consultation – 18 either raised no comment or gave support for the introduction of the direction, 1 supported the direction and considered that the area covered by the direction should be enlarged and 2 comments objected to the introduction of the direction.

2.2 To demonstrate how the Council has considered each representation, this section details a summary of each of the comments received during the consultation period, and then provides the recommendations in response.

2.3 There were no comments received that would require a material change to the proposed Direction. Therefore, there is no reason why the Council cannot proceed to confirm the Direction and the date on which it will become effective.

**Table 1: Consideration of Comments Received**

Organisation or Consultee	Comment	Recommended Response
2Let Burnley	Agree to stop future developments as it can lead to anti social behaviour along with parking issues in built up areas.	<p>Comment and support noted.</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning application, it will allow the Council to consider whether the specific proposal is acceptable or not.</p>
Resident AG	<p>I am a resident in Gannow area, on my street alone there are at least 4 current HMO's. Not all full, thankfully, if they were and you expect each resident to have a vehicle, the amount of traffic and need for parking is beyond the capacity of the street or those nearby. Then we have to consider the noise pollution, the current HMO's often have parties, going into the early nights. Every time another house becomes empty or goes up for sale the residents in the houses that use them as houses dread the thought of yet another HMO. On the nearby streets, including Woodbine Road, Windsor St, Oak St, ivory Street and Lionel Street all have at least 3 HMO's on those streets, this is over crowding. I support the ruling of HMO's to seek permission to have rooms of 3 or more, as the current model is based on residential homes in London, it is not fit for purpose in towns like Burnley</p>	<p>Comment and support noted</p>
Resident AM	<p>I would like to vote in agreement of the removal of the "permitted development rights". Far too many houses are being used for HMO purposes! I rent my property and I recently had to move, trying to find a property to rent that was still used as an original single dwelling was a very frustrating time. Also the rent that is being asked by landlords</p>	<p>Comment and support noted</p>

	for the properties that have been left as non HMO, have massively increased due to supply and demand.	
Individual AW	No to HMO's	<p>Comment and support noted .</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning application, it will allow the Council to consider whether the specific proposal is acceptable or not.</p>
Resident CR	I've just been reading your proposals in the Burnley Express regarding new planning permission on HMO's. Does this include Coal Clough with Deerplay Ward as this ward is not mentioned. If it doesn't that is ridiculous as plenty are being created on Coal Clough Lane itself. It's bringing house prices down and scaring families from moving into the area.	<p>Coal Clough with Deerplay Ward is not included. The Council is content that the boundary chosen for the article 4 is the most appropriate based on the evidence collated and the fact that the National Planning Policy Framework (NPPF) states that, in all cases, Article 4 Directions must “be based on robust evidence and apply to the smallest geographical area possible”. If confirmed, and when the article 4 is in force, the Council is committed to monitoring the effectiveness of the article 4 particularly with regard to the displacement of HMOs to other parts of the Borough.</p> <p>No change proposed.</p>
Fr. Frost St Matthews Church	In response to your review of HMO I would like to stop them being implemented in our town and particularly in my Parish. This area is surrounded by complex issues and the HMO's can open place vulnerable people and families in even worse situations. You will know our parish is blighted with issues such as child poverty, crime, domestic violence	<p>Comment and support noted.</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning</p>

	and addiction and I am clear in my mind the removal of all HMO's would only be a positive move to ease some of these issues.	application, it will allow the Council to consider whether the specific proposal is acceptable or not.
Resident HC	<p>The house next door to me has just been turned into an H.M.O, supposedly for 4 people. This was done with no consultation to the residents surrounding the house at all. How the destruction of a much-needed family home has been allowed is beyond comprehension.</p> <p>The surrounding houses and flats contain many elderly, ill, vulnerable, and special needs residents. Both the Borough Council and Calico Know this.</p> <p>The terrible weeks/months of the conversion have been indescribable, the noise is sometimes 100 Decibels inside my house. [Personal and family health issues described] I had to constantly go round there to complain as these houses are prefabs and can hear any undue noise, so it's been horrific. The owner has not installed sound proofing between that house and mine.</p> <p>I've researched the effects of these H.M.Os in other towns i.e.,</p> <ol style="list-style-type: none"> <li>1. Sharp rise in crime/ robberies/ violence</li> <li>2. Filth and rubbish all over.</li> <li>3. Alarming aggression.</li> <li>4. Filthy language</li> <li>5. Drug use.</li> <li>6. Drug dealing including targeting vulnerable people.</li> <li>7. Human excrement in yards and gardens.</li> <li>8. Inappropriate approaching of schoolgirls.</li> <li>9. Sharp rise in noise and disturbing the peace.</li> </ol> <p>The people who live around here, live in peace and quiet as they're entitled to. There are no police on the estate in the night or day to keep us safe. People are very frightened in the bungalows for the elderly/ sick/ vulnerable. [Family health issues mentioned]. I'm also very frightened.</p>	<p>Comments and support noted.</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning application, it will allow the Council to consider whether the specific proposal is acceptable or not. The lack of consultation referred to was due to the national permitted development right rather than the "Council's rules". Removal of the PD right will allow the Council to consult neighbours when a small HMO is proposed.</p>

	<p>We have a quiet relatively safe area here at [redacted]. We are totally defenceless against the trouble to come.</p> <p>Burnley already has enormous social problems. The Councils' rules ensured none of us were consulted and seems the council don't even care. Would you like your area to be turned into a dangerous slum. Or perhaps your elderly parents' areas? Some resident didn't even know what was happening.</p> <p>The rules need to be changed very quickly, not in a years' time. I also wish to know how you will be policing this area as well as the so called Police force.</p>	
Historic England	Thank you for consulting Historic England on the above article 4. At this stage we have no comments to make.	Noted
Resident JB	I am writing to SUPPORT the removal of permitted development rights for change of use C3 Dwellinghouses to C4 HMO. I don't believe in taking family homes and returning them to a Victorian era of living standards. These HMO developments cause nothing but trouble for local residents.	<p>Comment and support noted.</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning application, it will allow the Council to consider whether the specific proposal is acceptable or not.</p>
Individual JH	There's too many houses turning into HMOs. People can't buy or rent house's in their area, as soon as a house's come up for sale its snapped up by developer's. They're not interested in the community, just making four or five times the money if the rented them to families! They'll be bring the area down like they did when they just started renting out to anyone and spoiling the areas.	Comment and support noted
Individual JW	I wish to support councillor John Harbour in proposals to limit multiple occupants in one residence. I feel that the requirement for planning will allow the council to monitor number and ensure the town doesn't become a bedsit town. This issue could lead to wider issues re management of housing, maintenance and general development. The	<p>Comment and support noted.</p> <p>It is important to note however, that the Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning</p>

	council could be then vigilant to poor landlords etc. Please don't allow freedom in this area or the town could decline and the level of anti social behaviour could escalate.	application, it will allow the Council to consider whether the specific proposal is acceptable or not.
Lancashire County Council (Highways)	The Local Highway Authority have no objection and welcome the opportunity to comment on these types of applications.	Noted
Lancashire County Council (LLFA)	Thank you for consulting the Lead Local Flood Authority on the above consultation. Please accept this email as confirmation that we have no comments to make regarding the article 4 direction	Noted
Lancashire County Council (School Planning)	<p>LCC's School Provision and Sufficiency Team welcomes the above which would enable better management of the educational impact on Burnley Borough Council's future planning applications. From the Article 4 Consultation document we note:</p> <p>"A1.20 To be an HMO the accommodation has to be used by persons as their only or main residence. It is usually apparent if this is the case, but secondary legislation specifies certain situations where the nature of occupation is less clear cut. These include:</p> <ul style="list-style-type: none"> <li>• a refuge, that is a building or part of a building used by a voluntary organisation for temporary accommodation for people who have left their home as the result of domestic violence</li> <li>• occupation by asylum seekers and their dependents, where the accommodation has been provided under section 95 of the Immigration and Asylum Act 1999 and the accommodation is provided by a private landlord under contract to or on behalf of UKVI</li> </ul> <p>A1.21 A hostel or night shelter providing accommodation to homeless people may be an HMO because, even if the accommodation is overnight, it is the occupants' only residence. Rent (or consideration) must be paid for the HMO definition to apply."</p>	Comment and support noted.

	In order for LCC and The School Provision & Sufficiency Team to mitigate its statutory obligation to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire if they want one as stipulated in Section 14 of the Education Act 1996, we would request that Burnley Borough Council acknowledge that school aged children may be included in the above criteria. Although contributions are not sought in respect of planning applications for Student accommodation, contributions are sought in respect of affordable housing and 1 bedroom accommodation.	
Network Rail	Network Rail has no comments.	Noted
Resident PB	<p>With regards to Trinity ward. There are daily issues with ASB and minor crime committed by younger persons and public order by adults. This can often be heard constantly for 1 to 3 hours at a time. More so during dry weather. Most neighbours do not report these matters as they believe little or nothing can or will be done which does not make it worth the risk of repercussions</p> <p>A few properties with a large number of occupants attract large numbers of visitors who stand in the street getting intoxicated on drugs or alcohol becoming increasingly disorderly especially during good weather. This appears to be due to the large number of low value rental properties in the vicinity. Which attracts persons with alcohol and or drug addictions.</p> <p>A lot of the rental properties are neglected on the outside. Due to the design of Victorian houses combined with modern insulation, heating methods, mortar and plaster combined and cavities filled with soot, mortar and building rubble most properties suffer damp issues. Most of the back alleys are used for dumping and council trucks load up every week with it. There have been regular problems with rat infestations in the past. The roads with larger garden fronted terraces which have HMOs on them have insufficient parking. Cars especially taxis and delivery vehicles often block these roads as there is nowhere to pull up. There are regular road rage incidents where vehicles unable to pass meet head-to-head.</p>	Comments and support noted



	<p>[Comment about new residents coming to the borough]. Whilst this has been good for the town centre and helped solve empty property issues there has been no noticeable increase in local amenities. I suspect during this time been a sharp population increase with the curve having been steeper since the census.</p> <p>For the above reasons I believe it is essential that the council has control over small HMO'S in this area.</p>	
Padiham Town Council	Padiham Town Council wishes to express its support for the proposed changes to the rules around Houses in Multiple Occupation and that these will need planning approval in future	Support noted.
Resident RC	<p>I have recently moved to Burnley and live in Trinity Ward. I have a professional background in social housing management, having obtained the professional qualification of the Chartered Institute of Housing. I welcome and support the proposals to make an Article 4 declaration to ensure that small HMOs will now be subject to planning approvals. I would also hope that other actions might follow to help create sustainable and balanced communities. Trinity Ward clearly experiences high levels of environmental degradation and other indicators point to deprivation and inequality. Whilst these issues are broader than simply enhancing HMO regulation this proposal gives an additional tool to develop an effective ward strategy.</p>	Comment and support noted
Individual SA	<p>There are pros and cons in this debate as with all cases.</p> <p>I strongly oppose the council plan to remove permitted development rights for the change of use from Use Class C3 (dwelling-houses) to C4 (HMOs).</p> <p>The change of use will deal with the housing shortage and bring down rental prices for those struggling without council interference.</p>	<p>It is recognised that HMOs provide a form of low-cost housing, particularly for younger people and people on low incomes. They also provide flexible accommodation for people with short-term housing requirements. The Council is not aware of a shortage of HMOs. The Article 4 Direction is not intended to prevent all future small HMOs, but rather, by requiring a planning application, it will allow the</p>

		<p>Council to consider whether the specific proposal is acceptable or not.</p> <p>No change proposed.</p>
The Coal Authority	<p>Our records indicate that within the Burnley area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.</p> <p>It is noted however that this current consultation relates to an Article 4 Direction and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this proposed removal of PD rights.</p>	Noted
Woodberry Management	<p>I do not deal with any HMO's however I do have regular residential tenants on streets that do have HMO's.</p> <p>Notwithstanding various issues this causes, as you are well aware, overall they feel that the alternative is much much worse! They are currently very concerned about the rising demand and many associated costs for landlords that inevitable causes their rents to be increased.</p> <p>This is especially true once they move to other houses in this the Salford area. As you are aware the rents have dramatically increased over the past year. I worry that this measure would have a double negative impact further exacerbating an already serious shortage of suitable residential accommodation at affordable costs.</p> <p>This would be firstly as the new HMO landlord would have increase costs obtaining reports, time spent working on this and longer vacancy period whilst sorting. These costs would inevitably have to be passed onto tenants as the landlords are already working on extremely tight margins.</p> <p>Furthermore, some properties would no longer be suitable for HMO's and some landlords may decide it is not worth the bother. Instead of helping the current serious</p>	<p>The need for planning applications for HMOs within the article 4 boundary is necessary to better manage the number of HMOs in these areas and mitigate some of the issues attributed to their concentration.</p> <p>It is important to remember that when in force the article 4 will not rule out all new HMOs; any refusal of planning permission would need to be justified.</p> <p>The cost of a change of use application is not considered to be prohibitive to the likelihood of HMOs coming forward.</p> <p>It is recognised that HMOs provide a form of low-cost housing, particularly for younger people and people on low incomes. They also provide flexible accommodation for people with short-term housing requirements. The Council is not aware of a shortage of HMOs.</p>

	<p>shortage of suitable residential accommodation available – this would act in the opposite manner creating a greater shortage that automatically by default also causes rents to increase!!</p> <p>For the above reasons I feel that for the sake of the residents of Burnley this is not a good idea overall</p>	<p>The identification of properties unsuitable for a change of use to a HMO is judged to be a positive outcome of the proposed article 4.</p> <p>No change proposed.</p>
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## Appendix A – Site Notice Locations

<b>Gawthorpe</b>	Padiham Town Hall	Outside Best One Shop (Hapton Street)
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced	Site Visit Conducted 2/11/23 Notice still in place
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Notice Had Been Removed Notice Replaced.
<b>Gannow</b>	Outside Tim Bobbin	Kiddrow Lane (opposite Health Centre and Pharmacy)
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice still in place	Site Visit Conducted 2/11/23 Notice still in place
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Notice still in place
<b>Rose Grove</b>	Rosegrove Lane (outside Gillys Barbers at No 29)	Accrington Road outside Farmfoods
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Notice Storm Damaged Notice Replaced
<b>Trinity</b>	Accrington Road (outside Cohens Chemist No 155)	Coal Clough Lane Block with Oddies on
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice still in place	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice Storm Damaged Notice Replaced	Site Visit Conducted 16/11/23 Had Been Removed Notice Replaced
<b>Rosehill with Burnley Wood</b>	Outside Rose and Crown PH Manchester Road	Parliament Street (outside Parliament News)
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced	Site Visit Conducted 2/11/23 Notice still in place
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice Storm Damaged Notice Replaced	Site Visit Conducted 16/11/23 Notice still in place
<b>Daneshouse with Stoneyholme</b>	Colne Road Opposite Duke of York	Outside Old Red Lion PH (Town Centre)
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice still in place	Site Visit Conducted 2/11/23 Notice still in place
		Site Visit Conducted 09/11/23 Notice had been Removed Notice Replaced
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Notice still in place
<b>Bank Hall</b>	Briercliffe Road Outside Link Bridge Centre	Lyndhurst Rd Outside Belly Busters (No 68)
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice still in place	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced

2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Had Been Removed Notice Replaced
<b>Queensgate</b>	Briercliffe Shopping Centre	Colne Rd Outside KFC
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced	Site Visit Conducted 2/11/23 Notice still in place
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice Storm Damaged Notice Replaced	Site Visit Conducted 16/11/23 Notice still in place
<b>Brunshaw</b>	Brunshaw Rd outside Tesco Express	Brunshaw Road at the junction with Mizpah Street
1 <sup>st</sup> Site Visit	Site Visit Conducted 2/11/23 Notice Had Been Removed Notice Replaced	Site Visit Conducted 2/11/23 Notice still in place
2 <sup>nd</sup> Site Visit	Site Visit Conducted 16/11/23 Notice still in place	Site Visit Conducted 16/11/23 Notice Storm Damaged Notice Replaced



## REPORT TO EXECUTIVE



<b>DATE</b>	<b>04.04.24</b>
<b>PORTFOLIO</b>	<b>Leadership</b>
<b>REPORT AUTHOR</b>	<b>Clare Jacson</b>
<b>TEL NO</b>	<b>01282 477231</b>
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## Additional Local Authority Housing Fund Round 3 (LAHF R3) for Temporary Accommodation

### PURPOSE

1. To seek approval to accept the additional £134,800 from the Department for Levelling Up, Housing and Communities ('DLUHC') to deliver a further two homes for continued use as temporary accommodation.

### RECOMMENDATION

2. To delegate authority to the Head of Legal & Democratic Services to enter into an agreement with the DLUHC to deliver the Local Authority Housing Fund Round 3 25/26 as per the report.

### REASONS FOR RECOMMENDATION

3. To reduce the ongoing revenue cost of temporary accommodation as the Council will no longer pay the annual lease cost to the property owners.
4. To have control of the temporary accommodation to ensure the properties are maintained to a good standard, well managed for homeless families and remain in use as temporary accommodation for as long as the Council determines there is a need.
5. To increase the number of Council owned temporary accommodation properties by two taking the total to twenty-two including the six from the Rough Sleeping Accommodation.

## SUMMARY OF KEY POINTS

6. As a result of the Covid 19 pandemic and the Governments instruction of “everyone in”, the Council rapidly secured additional temporary accommodation through lease agreements with accredited private landlords. Following the Pandemic, the properties continue to be in high demand for temporary accommodation from families requesting assistance under the Council’s statutory homelessness duties.
7. Homelessness legislations states that families should not be accommodated in B&B accommodation, or if this proves unavoidable, should be housed there for no more than 6 weeks. To achieve this objective, it has been necessary to increase the number of family properties the Council has available for homeless households.
8. To meet the increasing demand for family accommodation the Council has extended the leases on the properties from accredited landlords. This has been successful, and fewer families have been placed into B&B accommodation.
9. To support Councils the Home Office and DLHUC implemented a Local Authority Fund 23-24, allocating initial funding and inviting each local authority to submit a validation form. Burnley received an initial capital allocation of £469,000 to deliver 6 homes. To date the Council have delivered 2 of these homes with the remaining 4 completing by the end of March/April 2024.
10. In January 2024 the Home Office invited further expressions of interest for additional LAHF funding that may become available. Further funding has become available, and the Council were informed on the 29<sup>th</sup> February 2024 that they have been awarded a further £201,000 to deliver an additional three homes by August 2024 to use as temporary accommodation for general housing needs.
11. On the 7<sup>th</sup> March 2024 the Council received an initial funding allocation from LAHF R3 of £134,800 capital funding and £1,000 revenue funding to deliver 1 home for temporary accommodation for general housing needs. The other home for temporary accommodation for a family that is part of the Government's Afghan Relocations and Assistance Policy (ARAP), for Afghan citizens who worked with the UK Government in Afghanistan and that are deemed eligible by the Ministry of Defence.
12. To receive this additional funding the validation form must be completed by the 28<sup>th</sup> March 2024 then the MOU requires signing and returning to DLHUC.

The table below summaries the funding received or allocated regarding the Local Authority Housing Funds:

\*The remaining 11 temporary accommodation units were funded through other sources.

Round	Amount	Properties	Delivered By
1	£469,000	3 general housing needs 3 resettlement	March 2024
2	£201,000	3 general housing needs	August 2024
3	£134,800 Capital £1,000 Revenue	1 general housing need 1 resettlement	24/25 can run into 25/26



## **FINANCIAL IMPLICATIONS AND BUDGET PROVISION**

13. It is estimated from the current market valuations that the cost to acquire and renovate the 2 additional homes will be £160,000. These properties will be funded through the £134,800 LAHF R3 allocation and the remaining from the Council's Asylum Seekers Fund.

## **POLICY IMPLICATIONS**

14. There are no direct policy implications. This scheme will be delivered within the Councils existing policy framework which supports the Prevention of Homelessness Strategy.

## **DETAILS OF CONSULTATION**

15. None

## **BACKGROUND PAPERS**

16. None

## **FURTHER INFORMATION**

**PLEASE CONTACT:**

**Wilma Waddingham 01282 477242**

**ALSO:**

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