



m.e.l
research

**Consultation on additional
(HMO) licensing and selective
licensing in Haringey**

Haringey Council

Final Report

March 2018



Project details and acknowledgements	3
Outline of the headline findings	4
Executive Summary.....	5
Introduction.....	8
Background.....	8
Public consultation	8
Results	12
Feedback from public meetings & other responses	33
Appendices	38

Project details and acknowledgements

Title	Consultation on Additional (HMO) housing licensing in Haringey
Client	Haringey Council
Project number	17142
Author	Karen Etheridge and Adam Knight-Markiegi
Research Manager	Karen Etheridge

M·E·L Research would like to thank the council for their support with the consultation. We would also like to thank residents, tenants, landlords and agents in the borough and neighbouring boroughs for taking part in the consultation.

M·E·L Research

2nd Floor, 1 Ashted Lock, Birmingham Science Park Aston, Birmingham. B7 4AZ

Email: info@melresearch.co.uk

Web: www.melresearch.co.uk

Tel: 0121 604 4664



Outline of the headline findings

This summary shows the headline findings from a consultation that was undertaken in Haringey on a proposal to introduce Additional (HMO) Licensing across the borough and Selective Licensing in selected parts of the borough. In total, 607 respondents took part in the survey with further feedback gathered from four public meetings. The consultation period spanned 12 weeks (11th December 2017 to 5th March 2018). The main method of consultation was an online survey which was hosted independently by M·E·L Research.

Key Headlines

Proposal for borough-wide Additional (HMO) Licensing in Haringey

Table 1: Responses to borough-wide Additional (HMO) Licensing proposal (overall/by respondent group)

	Overall	Landlords	Residents	PRS tenants
Support proposal for Additional Licensing	70%	45%	80%	77%
Do not support Additional Licensing	22%	39%	14%	16%
Don't know	8%	15%	6%	7%
Positive impact	53%	21%	65%	59%
Negative impact	19%	34%	12%	16%
No impact	18%	29%	14%	15%

Overall, support for a borough-wide Additional Licensing scheme is quite strong (70% in support). Opposition to the scheme is highest amongst landlords (39%), whilst residents are most in favour (80%). Around half of all respondents (53%) feel it will have a positive impact on them, with residents again most positive (65% positive), whilst landlords are most negative (34% negative).

Proposal for Selective Licensing in parts of Haringey

Table 2: Responses to Selective Licensing proposal in parts of Haringey (overall/by respondent group)

	Overall	Landlords	Residents	PRS tenants
Support proposal for Selective Licensing	57%	27%	67%	70%
Do not support Selective Licensing	36%	66%	26%	21%
Don't know	8%	7%	7%	10%
Positive impact	43%	11%	53%	54%
Negative impact	31%	61%	22%	22%
No impact	15%	17%	15%	13%

Support for a Selective Licensing scheme in parts of Haringey is fairly well supported (57% overall), but less so than an Additional Licensing scheme. PRS tenants are most in favour of the scheme (70%), whilst two thirds of landlords are opposed to it (66%). Six out of ten landlords (61%) feel it will have a negative impact on them, whilst over half of PRS tenants and residents feel it will be positive (54% and 53% respectively).

Executive Summary

This summary provides the main findings from the consultation undertaken in Haringey on the proposals to introduce Additional Licensing for Houses in Multiple Occupation (HMOs) across the whole borough of Haringey, and Selective Licensing in 29 areas across the borough. An online survey was used as the main method of consultation, which was hosted independently by M·E·L Research. The consultation ran for 12 weeks from 11th December 2017 to 5th March 2018. In total, 607 responses were received. Qualitative feedback was recorded at four different public meetings, and also via written responses submitted by interested parties.

The results include support for and likely impact on respondents for a proposal that the council is considering introducing to improve the private rented sector:

- Implement an Additional (HMO) licensing scheme across the whole of the borough.
- Implement a Selective Licensing scheme in 29 areas of the borough (see Appendix A for map).

The consultation also looked at views on the proposed licensing costs and conditions.

Key findings

1. Borough-wide Additional Licensing scheme

- Support for a borough-wide Additional Licensing scheme is strong, with seven out of ten (70%) respondents in support and over half (53%) feel it will have a positive impact on them.
 - The most common reason respondents give for *supporting Additional Licensing* is that it will **create better living conditions and better maintained properties**.
 - The most common reason respondents give for *not supporting a scheme* is that it will **raise rents and/or reduce housing stock**.
- When we look at support for Additional Licensing by the different respondent types, we find that:
 - Residents of Haringey are most supportive of a scheme being introduced (80% in support), with 65% feeling it will have a positive impact on them.
 - Landlords are least in favour of Additional Licensing, with under half (45%) in support, whilst just slightly fewer (39%) say they do not support it. Around a third (34%) say it will have a negative impact on them.
- Just under six out of ten (57%) believe the **Additional Licence fees are reasonable**, whilst a slightly smaller proportion (53%) feel the other fees/charges for the scheme are reasonable. Just under three out of ten (28%) feel the licence fee is unreasonable.
 - Residents are again most positive about the licence fee, with 68% saying it is reasonable.
 - Landlords are significantly more negative, with half (51%) saying it is unreasonable.

- Just under six out of ten respondents (58%) agree that the **Additional Licensing conditions are reasonable**, and that they will help improve the standard of private rented housing.
 - Both residents and PRS tenants are supportive of the conditions (68% and 65% respectively feel they are reasonable).
 - Landlords are much more negative, with only a quarter (25%) agreeing they are reasonable, whilst just under half (45%) do not agree.

2. Selective Licensing scheme in 29 areas of the borough

- Support for a Selective Licensing scheme is fairly strong, with 57% of respondents in support and 43% saying it will have a positive impact on them. However, support is lower than it is for Additional Licensing
 - The most common reason respondents give for *supporting Selective Licensing* is again that it will **create better living conditions and better maintained properties**.
 - The most common reason respondents give for *not supporting a scheme* is also that it will **raise rents and/or reduce housing stock**.
- When we look at support for Selective Licensing by the different respondent types, we find that:
 - Residents and privately renting tenants are most supportive of a scheme being introduced, with 70% and 67% in support and over half (53% and 54% respectively) say it will have a positive impact on them.
 - Landlords are least in favour of Selective Licensing (much less so than Additional Licensing), with two thirds (66%) saying they do not support it. Six out of ten (61%) also say that it will have a negative impact.
- Around half of respondents (51%) believe the **Selective Licence fees are reasonable** and that the **other fees/charges** for the scheme (48%) are reasonable. Over a third (36%) feel the licence fee and other fees/charges are unreasonable.
 - Residents and PRS tenants are both positive about the licence fee, with six out of ten (61%) saying it is reasonable.
 - Landlords are very negative, with over two thirds (68%) saying it is unreasonable.
- Just under half of respondents (48%) agree that the **Selective Licensing conditions are reasonable**, and that they will help improve the standard of private rented housing. However, over a third (35%) do not agree.
 - Both residents and PRS tenants are supportive of the conditions (58% and 59% respectively feel they are reasonable), although slightly less so than for Additional Licensing.
 - Landlords are much more negative, with only a fifth (19%) agreeing they are reasonable, whilst over six out of ten (63%) do not agree.

3. Other comments about the proposals or ideas

Respondents were asked whether they had any other comments about the proposals, or whether they had any other ideas about what the council could do to improve housing in the Private Rented Sector. The most common response is that licensing is a good idea and will ‘**create better living conditions /better maintained properties**’, with a similar number saying that it is positive and will ‘**offer better protection to tenants and landlords**’. The most common idea is for the council to ‘**enforce and police using existing powers**’ they have, rather than introducing licensing.

Feedback from the public meetings is slightly different in focus from the survey results (which were mainly attended by landlords), as landlords feel strongly that they are being **unfairly penalised and taxed by the council**, that the council should purely **focus on targeting bad landlords using their existing powers** and that **the schemes will not work to tackle bad/rogue landlords**, as they will just continue to operate under the radar.

Introduction

Background

Haringey Council is proposing to introduce two new housing licensing schemes:

1. **Additional Licensing** – A borough wide scheme that will require all HMOs in Haringey to be licensed. This will include the category of HMO which is often referred to as a section 257 HMO. Section 257 HMOs are where the building was converted into self-contained flats before the 1991 Building Regulations came into force on 1st June 1992 and have not been subsequently improved to at least the 1991 standards.
2. **Selective Licensing** – a scheme that will require all other privately rented properties located in the 29 LSO areas to be licensed.

As part of the licensing considerations, Haringey Council commissioned M·E·L Research, as an independent research organisation, to produce an independent report on the consultation, along with running a number of public meetings to present the proposals to interested parties, and gather feedback on the proposals.

Public consultation

The public consultation took place over a 12-week period (11th December 2017 to the 5th March 2018). An online survey was used as the principle method of consultation, with paper copies of the questionnaire and a telephone helpline available for those who wished to complete the survey either way. An email address was also provided by the council to gather any written comments or feedback that have been analysed and included in the appendices.

The survey was promoted by the Council to interested parties within the borough, such as landlords, agents, tenants, residents, local businesses and third sector organisations. It was also promoted to neighbouring boroughs and encouraged neighbouring local authorities to promote the survey to landlords, residents, tenants and other businesses who may wish to take part in the consultation. A full list of all activities taken to promote the consultation is below:

- Email to 600 landlords/Letting Agents operating in Haringey Council
- Letter to every household within the proposed 29 Selective Licensing areas (approximately 30,000)
- Approximately 36,000 letters to identified private sector properties in the borough.
- Leaflets, Posters and paper questionnaires distributed to Libraries.

- Information available on the Council's website
- Officers gave presentations and took part in Q&A sessions at 4 Public Meetings, Borough wide Neighbourhood Watch Meeting and local Neighbourhood Watch meetings.
- 9 drop in sessions held at various locations, days and times across the borough.
- Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents.
- Press release and consultation picked up by:
 - Local: Ham and High, Parikiaki, Tottenham independent
 - National: BBC Newsround
 - Trade Press: Residential Landlord Association, Landlord Today, Housing 24.
- Bridge Renewal Trust promoted the consultation through weekly e-bulletin and social media.
- Details of the consultation sent to HFH Resident' Associations and all Neighbourhood Watch representatives.
- Article in Haringey People Magazine – distributed to all households in the borough.
- Regular reminders with links to the consultation were posted out via Social Media.
- 2 appearances in Haringey People extra – emailed to 40,000 subscribers.

In addition, four public meetings were held with interested parties who signed up to attend, and qualitative views were gathered, which are presented in the report.

Proposals

The consultation focused on the degree to which respondents support the proposal being considered by the council, along with the likely impact they are to have on respondents around:

- Implement an Additional (HMO) licensing scheme across the whole of the borough.
- Implement a Selective Licensing scheme in 29 areas of the borough (see Appendix A for map).

The consultation also looked at views on the proposed licensing costs and conditions.

Statistical significance and profile of respondents

An online survey was completed by 607 respondents, with 10 of these being from respondents outside of the borough. Based on a total estimated population (2016 mid-year estimates - over 18s) of 215,981 in the borough, the results provide a confidence interval of +/-4% based on a 50% statistic at the 95% confidence level. This means that if 60% of the sample supported any proposal then the real figure, had the whole borough been interviewed, lies somewhere between 56% and 64%. The data has not been weighted.

A breakdown of respondent types is provided in the table below.

Table 3: Respondent profile to the online survey

Respondent profile	Number	% of responses
A resident of Haringey	451	74%
A landlord with a property (or number of properties) in Haringey	135	22%
A landlord living outside of Haringey with a property (or number of properties) in Haringey.	59	10%
An agent, managing properties in Haringey	16	3%
A business operating in Haringey	10	2%
A community group or charity operating in Haringey	8	1%
A resident / landlord / business in a neighbouring borough to Haringey	12	2%
Other	12	2%

(multiple answers possible)

Public meetings

Four public meetings were hosted by M·E·L Research, to introduce the proposal to anyone interested in finding out more about the proposal and to share their views. Council officers were present at each of the public meetings, with a Question and Answers session included as an opportunity for attendees to ask the council any questions about the proposals, as well as provide them with an opportunity to feedback views and concerns. The dates, times, venue and approximate number of attendees for each meeting are presented below.

Table 4: Public meeting attendees

Date/time	Venue	Approx. no of attendees
16 th January 2018 – 7.30pm	Jacksons Lane	31
18 th January 2018 – 7.30pm	Northumberland Park Resource Centre	15
23 rd January 2018 – 6.30pm	Haringey Civic Centre	30
14 th February 2018 – 3pm	Haringey Civic Centre	23
TOTAL	-	99

Reporting conventions

We have used the term 'landlord' in this report to collectively refer to both landlords and/or their managing agents.

Owing to the rounding of numbers, percentages displayed visually on graphs or charts in the report may not always add up to 100% and may differ slightly when compared with the text. The figures provided in the text should always be used. For some questions, respondents could give more than one response (multiple choice). For these questions, the percentage for each response is calculated as a percentage of the total number of respondents and therefore percentages do not add up to 100%.

The consultation findings have been analysed overall and by type of respondent (landlord/agent, privately renting tenant or resident). Results for neighbouring boroughs are included in the overall figures, and provided separately as Appendix 7 responses (10 responses in total).

Results

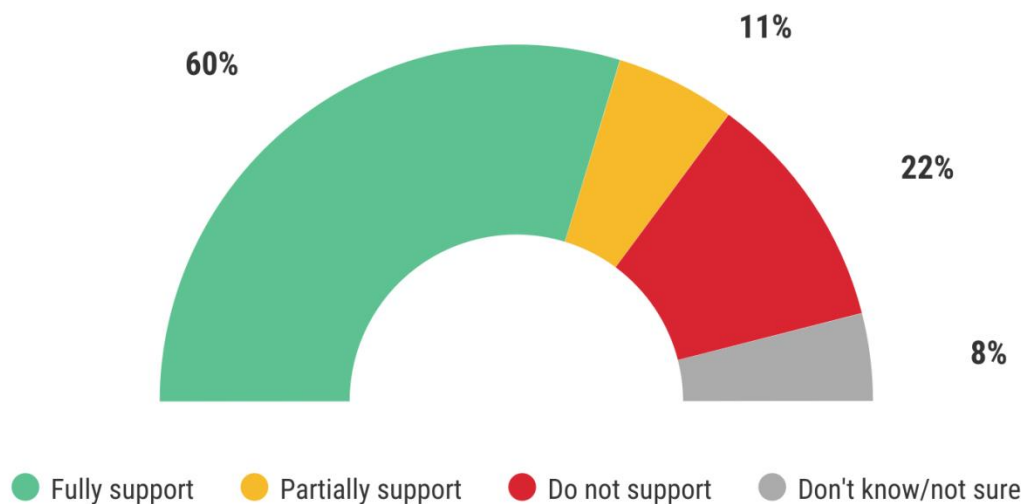
This section of the report presents the results from the consultation.

Introduce Additional (HMO) licensing across the borough

The Council are proposing to introduce a borough-wide scheme, which would require all Houses in Multiple Occupation (HMOs) in Haringey to be licensed.

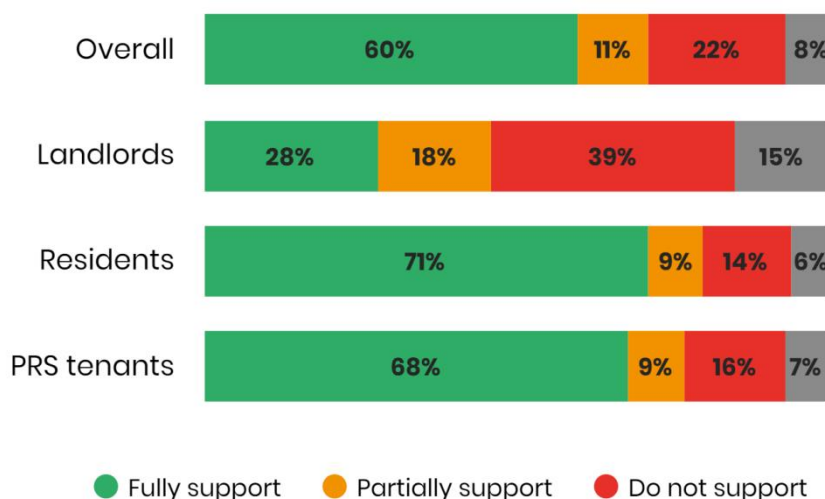
Around seven out of ten respondents (71%) support the proposal to introduce a borough-wide Additional Licensing scheme, whilst around a fifth (22%) do not support it.

Figure 1: Support for introducing Additional (HMO) Licensing across the borough (overall)



Residents living in Haringey are very supportive of the scheme being introduced (80% in support). This is closely followed by around three quarters (77% in support) of tenants who are privately renting properties in Haringey. Landlords are much less in favour, with 45% in support and 39% who do not support the proposal; 15% of landlords said they did not know or were unsure.

Figure 2: Support for introducing Additional (HMO) Licensing across the borough (by respondent type)

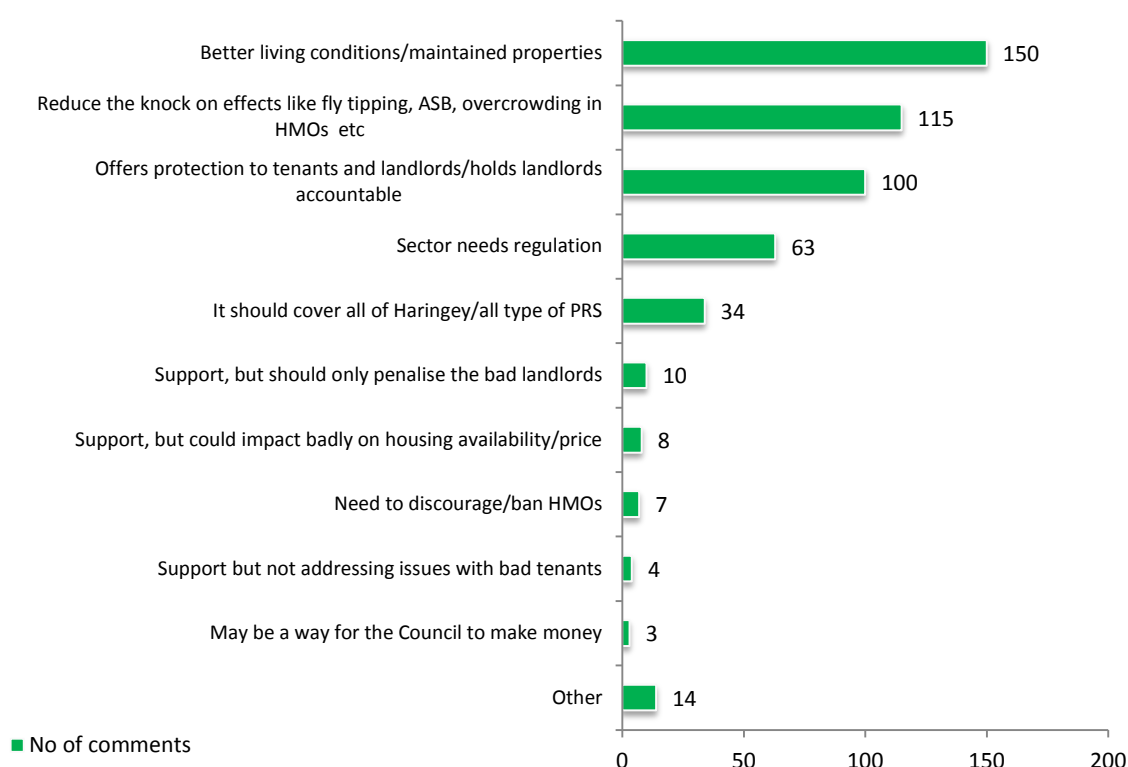


Comments on support for Additional Licensing

Reasons for supporting an Additional Licensing scheme

Respondents who say they support the introduction of an Additional Licensing scheme were asked to give their reasons why. 351 respondents commented. However, frequently there were several reasons given in each comment, so each 'reason' is coded separately. The most common reason cited for supporting Additional Licensing is that it will create 'better living conditions and better maintained properties' (150 comments), followed by reducing things like 'fly tipping, ASB and overcrowding in HMOs' (115 comments) and 'offering protection to tenants and landlords' (100 comments).

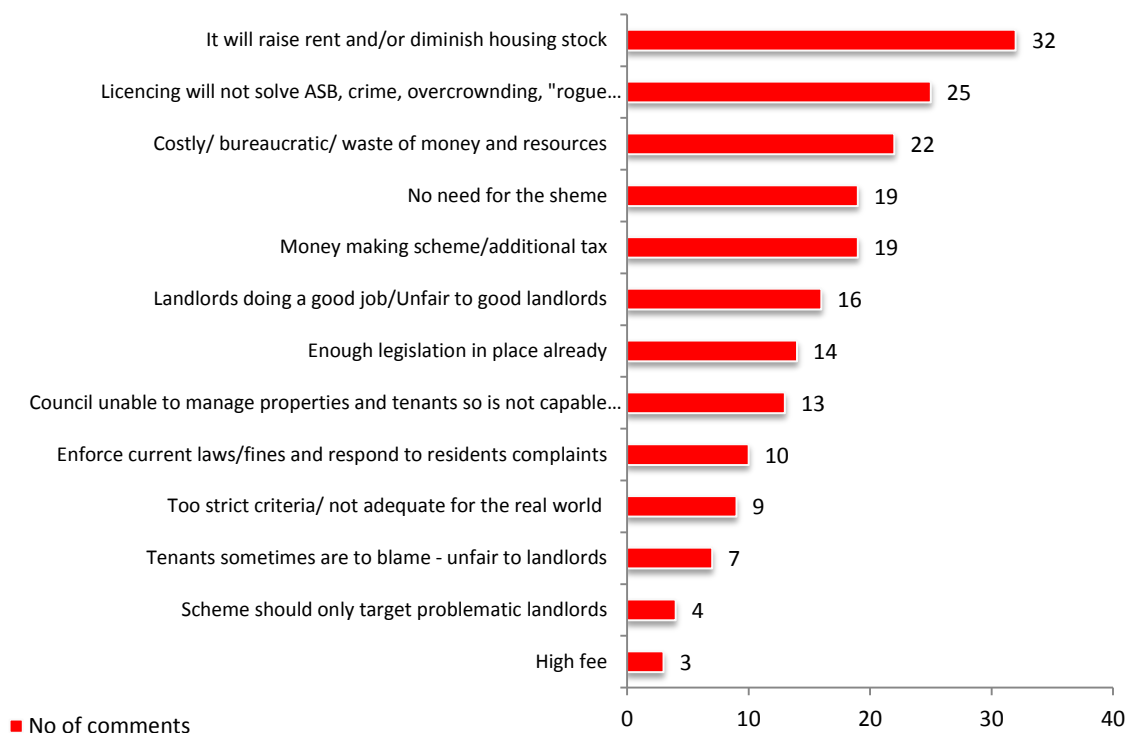
Figure 3: Reasons for supporting the introduction of Additional (HMO) Licensing (coded comments)



Reasons for opposing an Additional Licensing scheme

Respondents who say they do not support an Additional Licensing scheme were also asked to give their reasons why. 109 respondents commented. The most common reason cited is that it will 'raise rents and/or reduce housing stock' (32 comments), followed by licensing will not be able to 'solve ASB, crime, overcrowding, rogue landlords and other issues' (25 comments). This is followed by 22 comments around licensing being a 'waste of money and resources'.

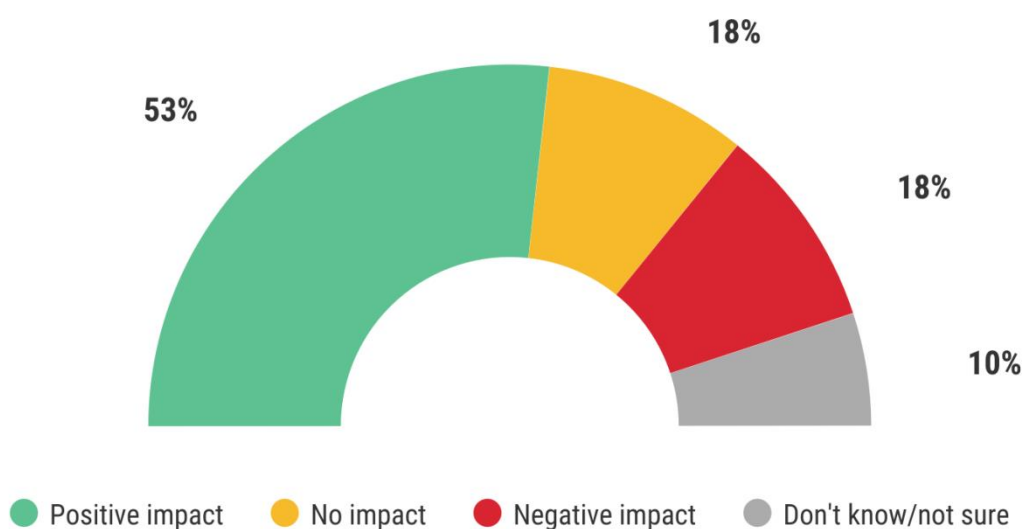
Figure 4: Reasons for not supporting the introduction of Additional (HMO) Licensing (coded comments)



Likely impact on respondents

Around half of respondents (53%) feel that introducing Additional Licensing will have a positive impact on them, whilst one in five (18%) feel it will have a negative impact. One in five feel it will have no impact (18%).

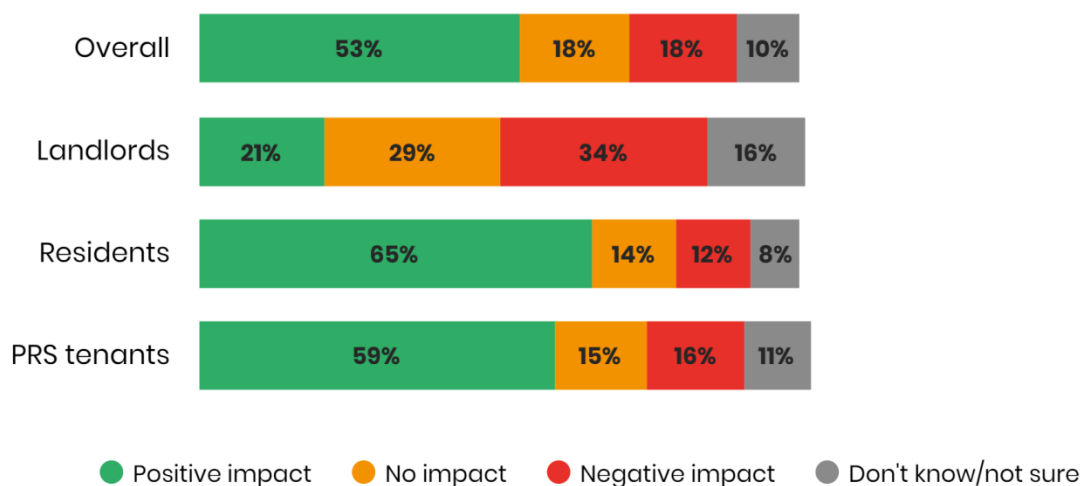
Figure 5: Likely impact of introducing Additional Licensing on respondents (overall)



Residents are again most positive, with two thirds (65%) saying Additional Licensing will have a positive impact, and only 12% saying it will have a negative impact. Around six out of ten (59%) of privately renting

tenants feel it will have a positive impact, whilst one in six (16%) feels it will be negative and a similar proportion feel it will have no impact (15%). One in three landlords (34%) feel it will have a negative impact, although three out of ten (29%) feel it will have no impact on them.

Figure 6: Likely impact of introducing Additional Licensing on respondents (by respondent type)



Comments on the impact of Additional Licensing

Reasons why Additional Licensing will have a positive impact

Respondents who said Additional Licensing will have a positive impact on them were asked to say why. 235 respondents commented. The most common reason is that respondents feel it will 'positively affect neighbours and local area by tackling ASB, fly tipping and overcrowding' (107 comments), followed by it resulting in 'better quality housing/living conditions' (97 comments) and that it 'holds landlords to account' (71 comments).

Reasons why Additional Licensing will have a negative impact

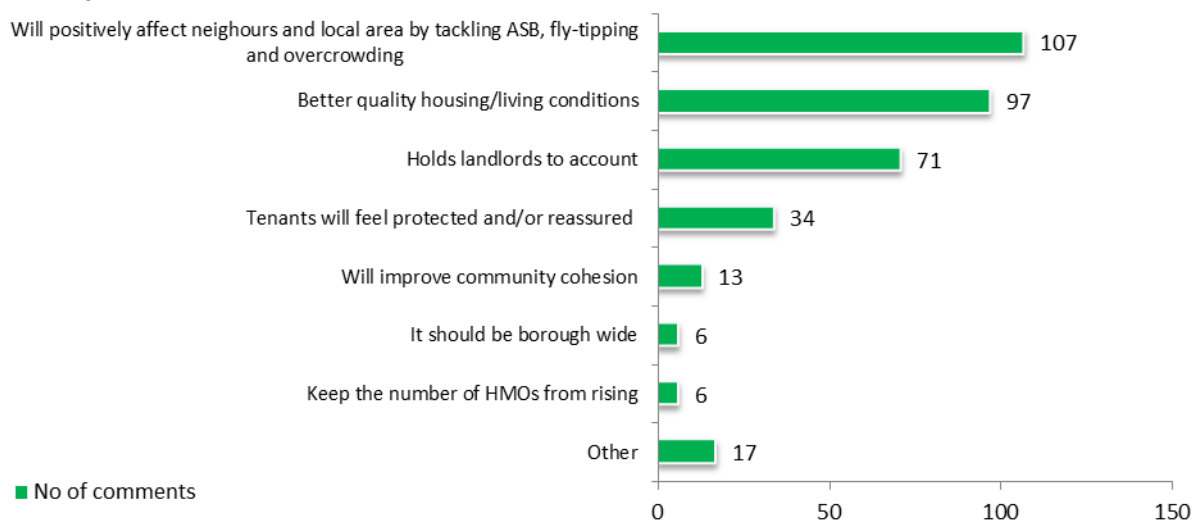
87 respondents provided comments on why they think Additional Licensing will have a negative impact on them. The most common reason is that it is 'unfair and costly to landlords (especially small/good landlords)' (41 comments), followed by 'costs will be passed onto tenants' (30 comments) and that there will be 'less available housing' (17 comments).

Reasons why Additional Licensing will have a no impact

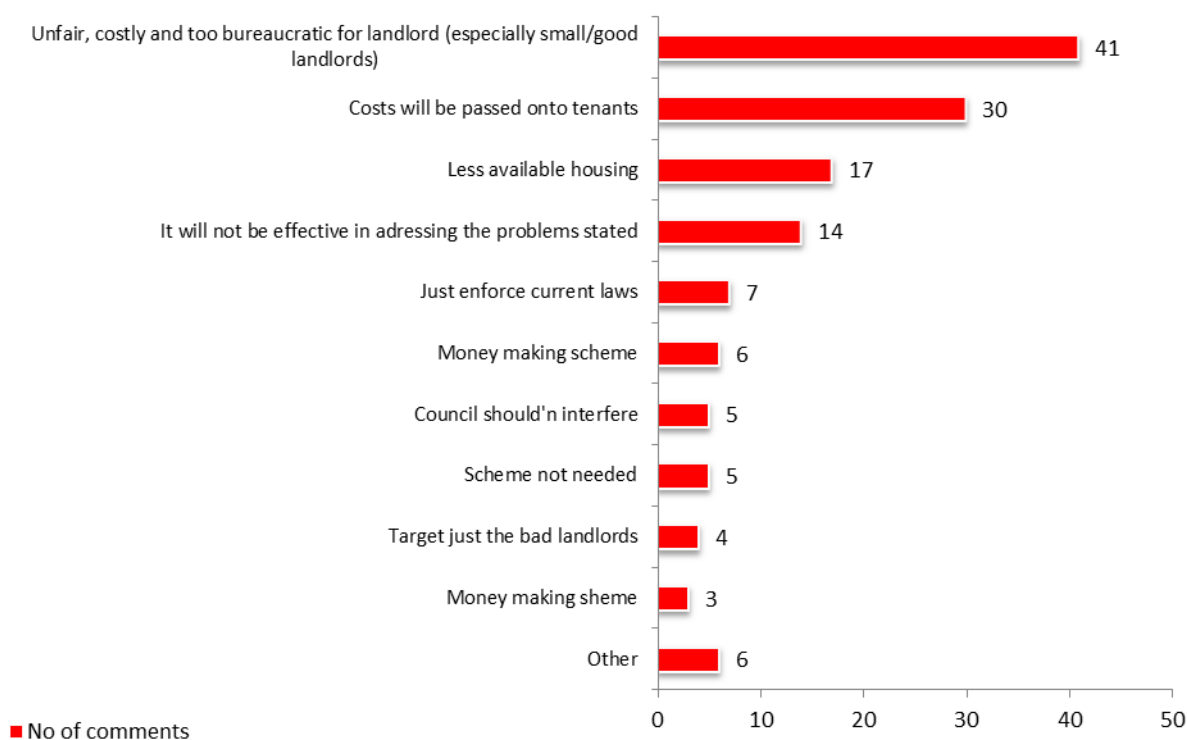
Finally, those who said that licensing will have no impact were asked to give reasons why. The most common reason given is that it will have 'no impact on me personally' as they don't rent/own an HMO (48 comments), followed by the scheme 'will not solve the problems' (10 comments) or that their 'property is already in good condition' (8 comments).

Figure 7: Comments on reasons given for impact (coded comments by positive, negative and no impact)

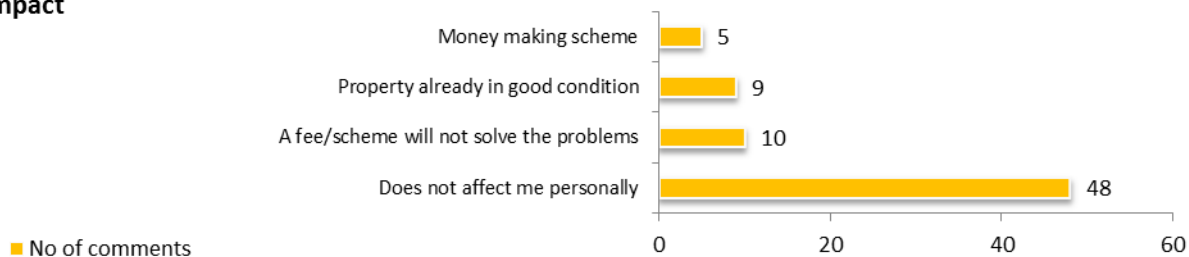
Positive impact



Negative impact



No impact

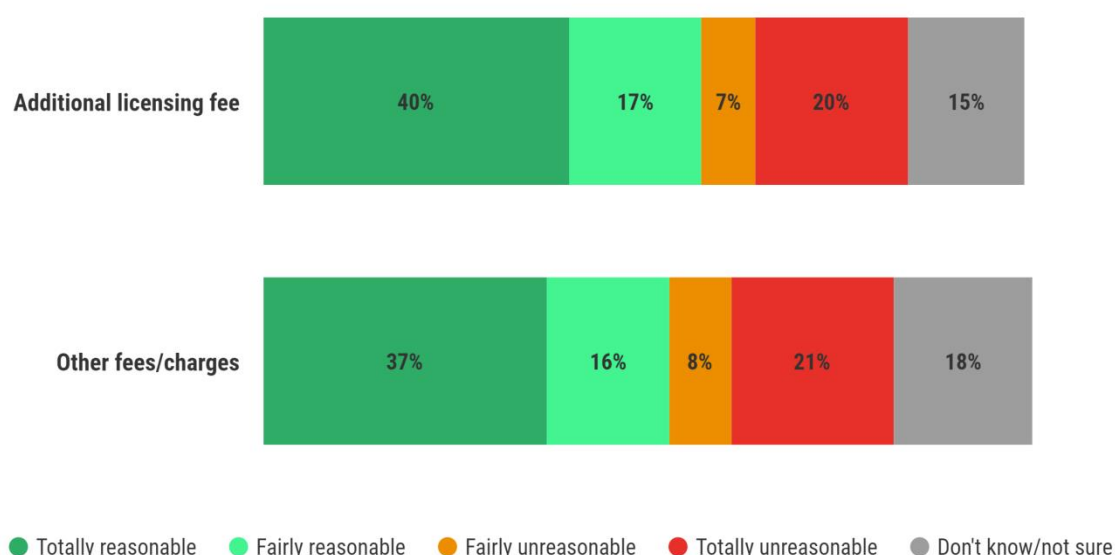


Additional Licensing fees

As part of the consultation, respondents were asked to comment on the proposed fees for the Additional Licensing scheme of £208 for a five year licence (excluding any discount or Additional costs). Further information on how the fees have been calculated was provided within the consultation document.

Respondents were asked a number of questions around the licensing fee, and the other fees and charges associated with the licence. Just under six out of ten (57%) respondents feel that the proposed Additional Licensing fee is reasonable. Around three out of ten (28%) think it is unreasonable. Results are similar when asked about the 'other fees/charges' for the Additional Licensing scheme, with over half (53%) saying they are reasonable and three out of ten (29%) saying they are unreasonable.

Figure 8: How reasonable are the proposed Additional Licensing fee and other fees/charges (overall)?



Residents are most positive about the licence fee, with around two thirds (68%) saying it is reasonable, and one in five (20%) saying it is unreasonable. Privately renting tenants are similarly positive, with 63% saying it is reasonable and 18% unreasonable. Landlords are significantly more negative about the proposed cost of the Additional licence, with around half (51%) saying it is unreasonable. Around a quarter (27%) feel it is reasonable.

Results are similar for the other fees/charges for Additional Licensing, although a slightly higher proportion of respondents from each group (i.e. landlords, residents and PRS tenants) say they don't know and slightly fewer feel they are reasonable.

Figure 9: How reasonable are the proposed Additional Licensing fee and other fees/charges (by respondent type)?



Comments on Additional Licensing fees

Reasons why Additional Licensing fees and other fees/charges are reasonable

Respondents who said that the licence fee is reasonable, were asked to say why. 202 respondents made comments. The main reasons given are that the licence fee is 'affordable in relation to the rental income' (66 comments), followed by it being affordable and 'justifiable for landlords to be responsible' (46 comments) and that it will 'cover the cost of managing/enforcing the scheme' (37 comments).

163 respondents said that the other fees/charges are reasonable. More often than not, respondents referred to their response to the previous question as to why they said this, so the top responses are the same (43, 39 and 23 comments respectively).

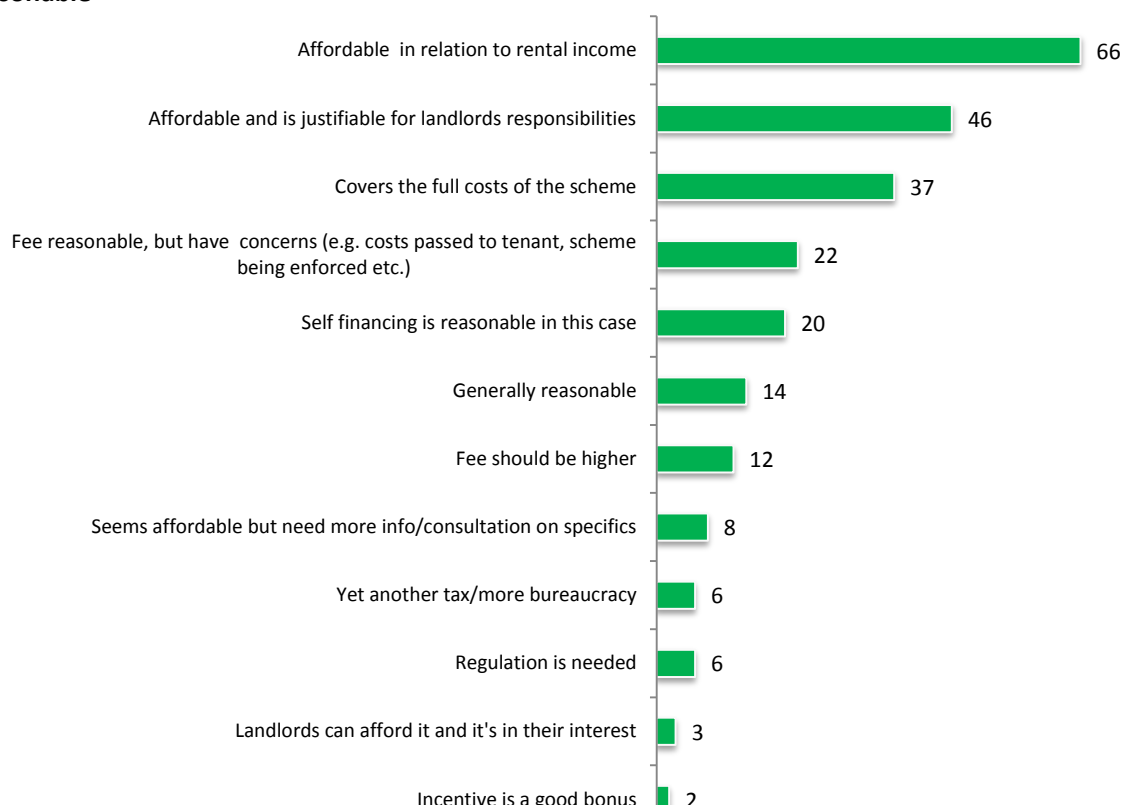
Reasons why Additional Licensing fees and other fees/charges are unreasonable

Those who said the licence fee is unreasonable were asked to give reasons why. 121 respondents made comments. The most common reason given is that it is 'expensive in light of the new tax/expenses regulations for landlords' (34 comments), followed closely by it being a 'money making scheme' (33 comments) and that it will impact on 'affordability for tenants/costs will be passed on/less housing available' (24 comments).

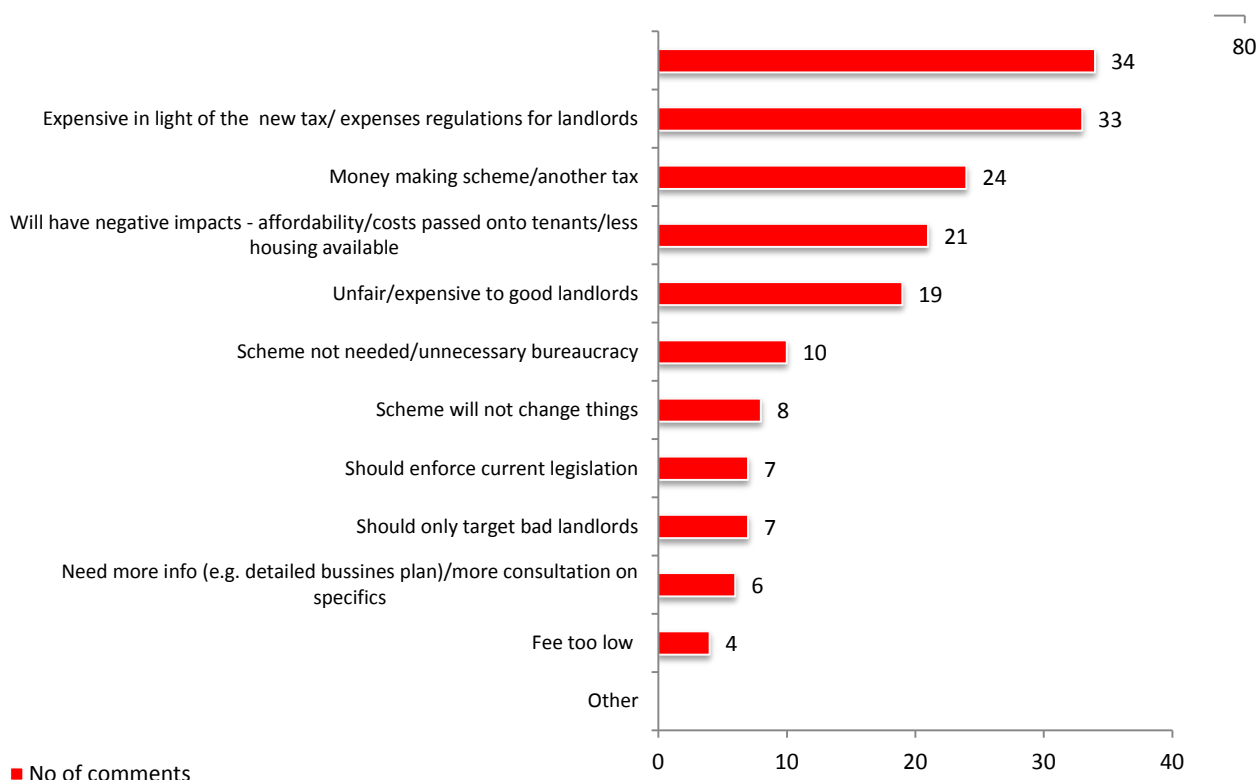
Reasons were again almost identical when respondents were asked why they felt that the other fees/charges were unreasonable (119 respondents). The same top 3 reasons were cited (33, 29 and 25 comments respectively).

Figure 10: Comments on whether licence fee is reasonable/unreasonable (coded comments by response)

Reasonable



Unreasonable



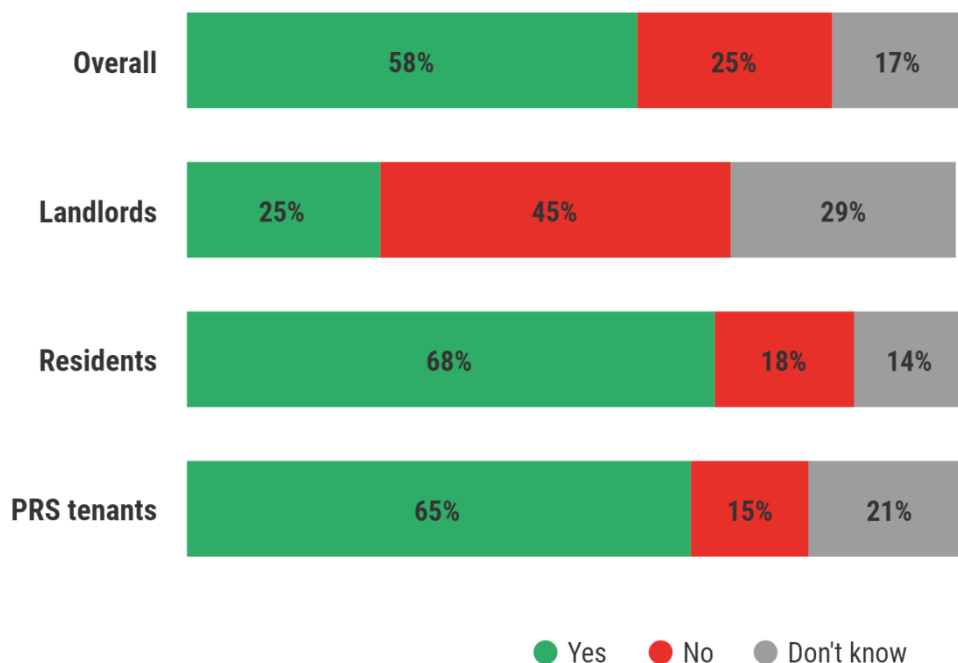
■ No of comments

Additional Licensing conditions

The last question asked respondents whether they feel the Additional Licensing conditions (provided as a separate document) are reasonable, and whether they will help to improve the standard of private rented housing.

Just under six out of ten respondents (58%) agree that the Additional Licensing conditions are reasonable, and that they will help improve the standard of private rented housing, whilst a quarter (25%) said they did not agree.

Figure 11: Are the Additional Licensing conditions reasonable and will improve standard of PRS housing (overall and by respondent type)



About two thirds of both residents and PRS tenants (68% and 65% respectively) feel that Additional Licensing conditions are reasonable and will improve housing. One in eight residents (18%) said they are not reasonable, similar to PRS tenants (15%). Landlords are far more negative, with only a quarter (25%) agreeing they are reasonable/will help improve housing, whilst just under half (45%) do not agree. However, around three out of ten landlords (29%) said they don't know, suggesting that they are perhaps unsure what impact licensing has on improving housing.

Comments on Additional Licensing conditions

Reasons why Additional Licensing conditions are reasonable and will improve standards

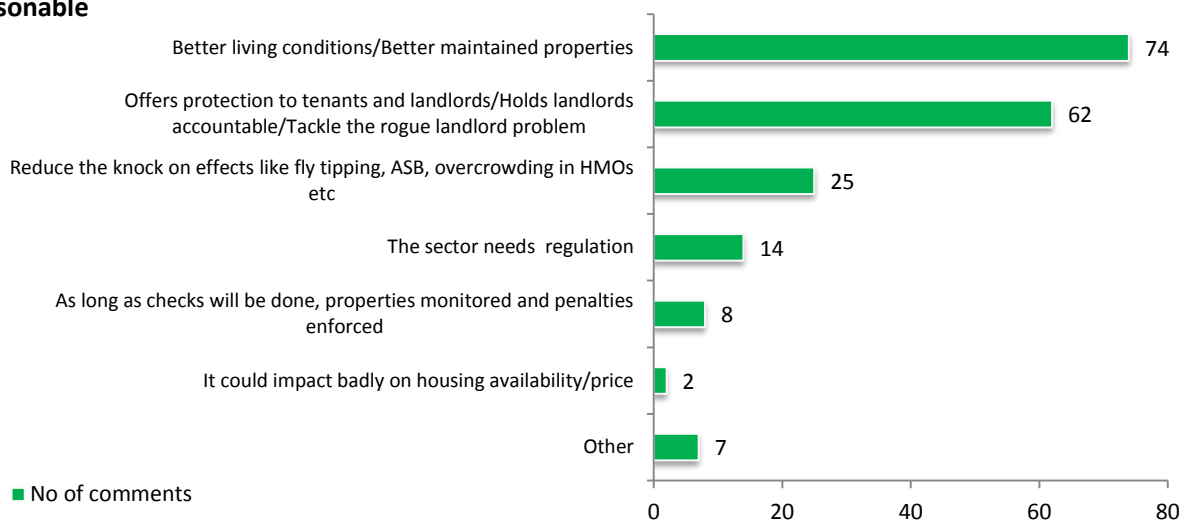
Respondents who said that the additional licensing conditions are reasonable and will improve standards of private rented housing were asked to give their reasons why. There were 140 valid comments to the question, although many referred to their previous comments. The most common responses are that the conditions will create 'better living conditions/better maintained properties' (74 comments), followed by them 'offering protection to tenants and landlords' (62 comments) and that they will 'reduce the knock on effects such as ASB, flytipping etc...' (25 comments).

Reasons why Additional Licensing conditions are unreasonable and will not improve standards

104 valid comments were provided by respondents, as to why the licensing conditions are unreasonable and will not improve standards of private made comments. Again, many referred to their previous comments. The most common reason is that the conditions are 'unfair/unnecessary burden to good landlords' (31 comments), that the 'scheme will not change/improve things' (26 comments) and that the council should 'enforce current legislation' (23 comments).

Figure 12: Comments on whether licence conditions are reasonable/unreasonable (coded comments by response)

Reasonable



Unreasonable

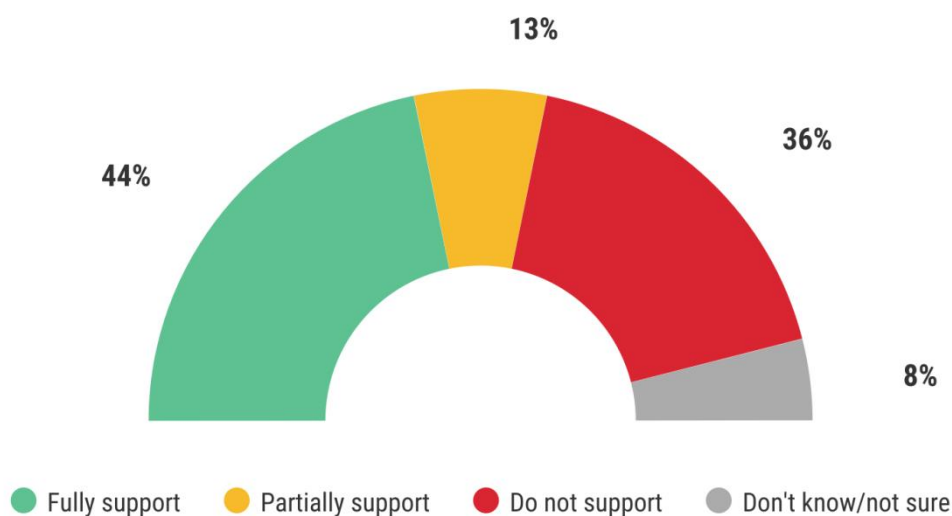


Introduce Selective Licensing in selected areas of Haringey

The Council are proposing to introduce a Selective Licensing scheme, which would require all other privately rented properties in 29 selected areas in Haringey to be licenced.

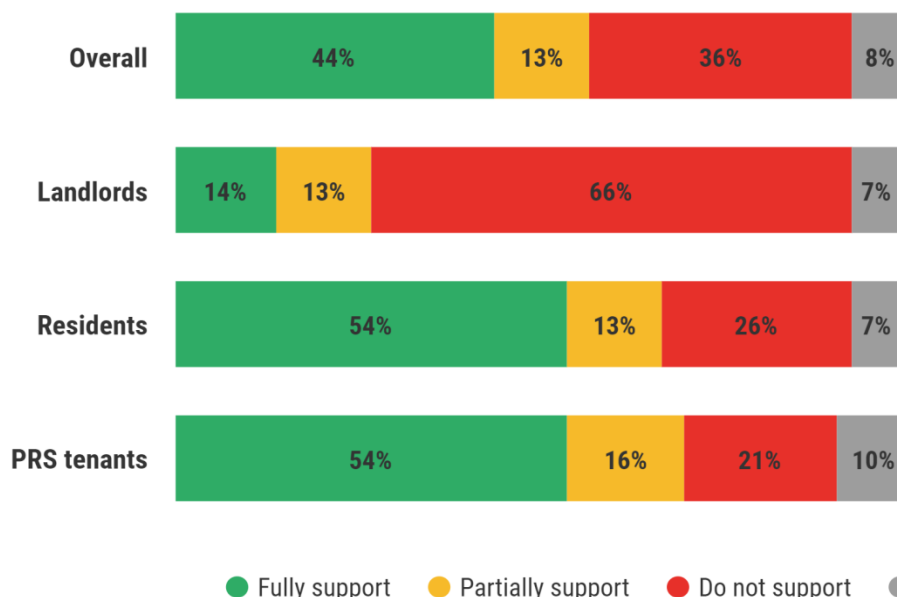
Support for introducing Selective Licensing in parts of the borough is reasonably well supported, with over half of respondents (57%) saying they support it. Over a third however (36%), do not support the proposal. This shows that support for Selective Licensing in Haringey is not as high as it is for Additional (HMO) licensing.

Figure 13: Support for introducing Selective Licensing in parts of Haringey (overall)



Tenants (privately renting) and residents show similar levels of support, with 70% and 67% respectively in support. However, over a quarter of residents (26%) do not support the proposal. Landlords are more negative about a Selective Licensing scheme, with two thirds (66%) saying they do not support the proposal, which is significantly higher than the other two respondent groups. Only a quarter of landlords (27%) support the proposal. These figures show that Selective Licensing is not as well supported as Additional Licensing by any of the respondent groups, but in particular by landlords.

Figure 14: Support for introducing Selective Licensing in parts of Haringey (by respondent type)

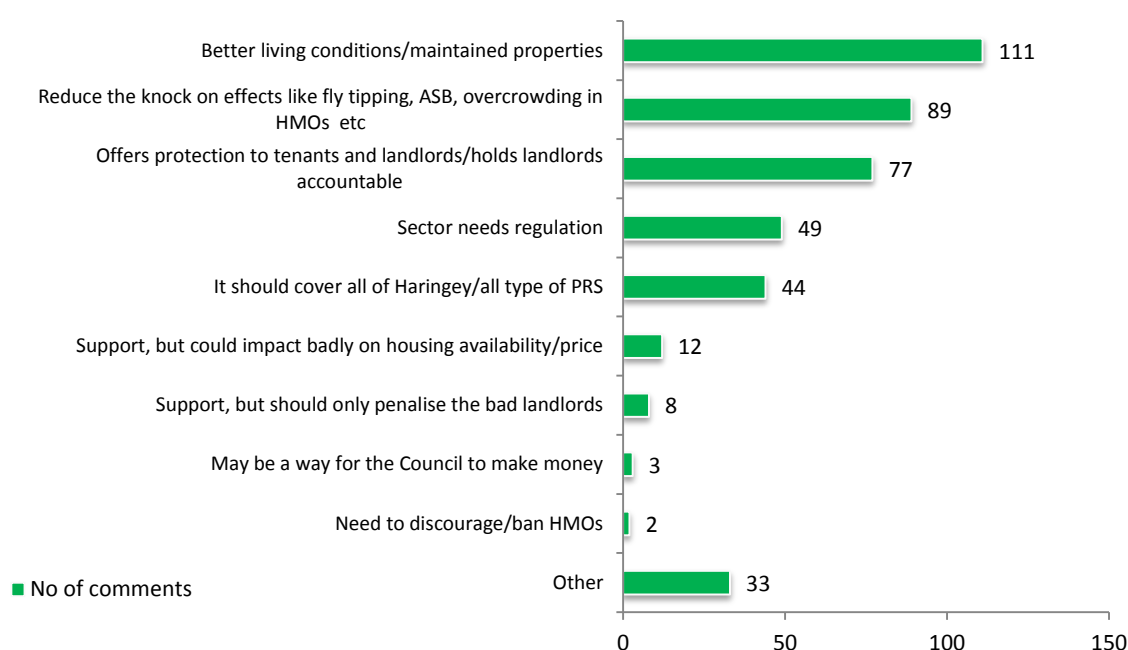


Comments on support for Selective Licensing

Reasons for supporting a Selective Licensing scheme

Respondents who say they support the introduction of a Selective Licensing scheme were asked to give their reasons why. 282 respondents commented. The most common reason cited are the same as those given for Additional Licensing (many respondents referred to their previous comments as their response to this question too) and that it will create 'better living conditions and better maintained properties' (111 comments), followed by reducing things like 'fly tipping, ASB and overcrowding in HMOs' (89 comments). This is followed by licensing 'offers protection to tenants and landlords' (77 comments).

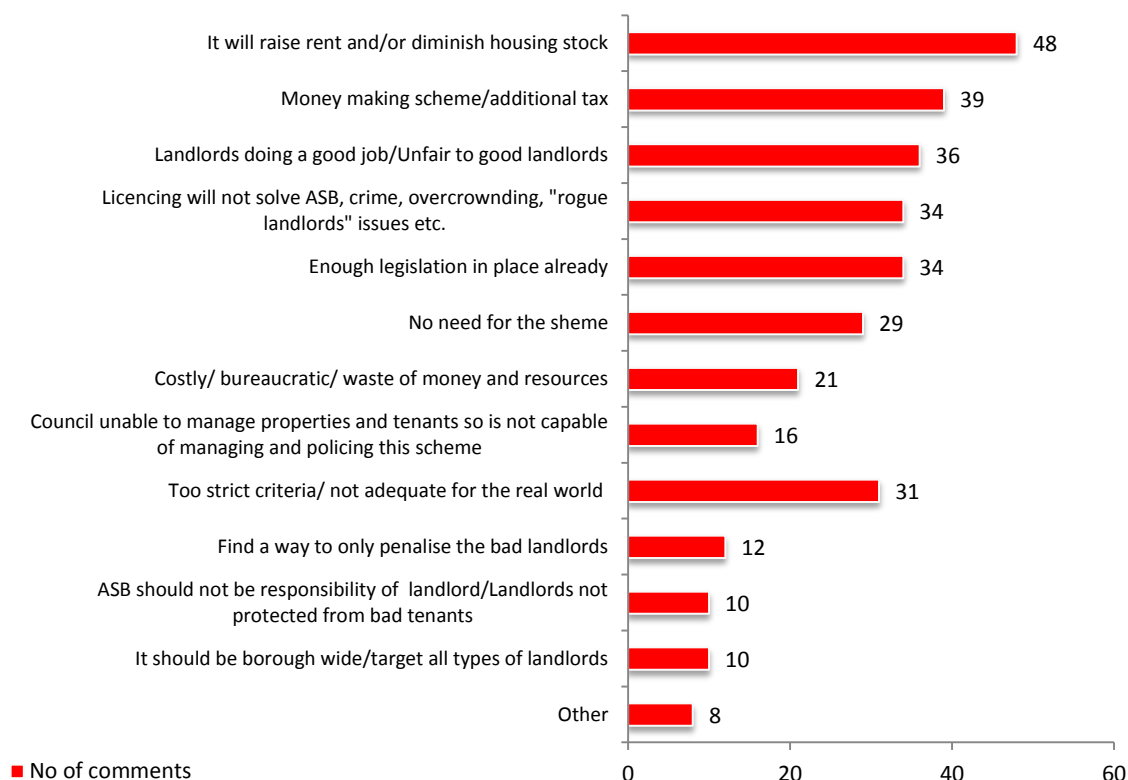
Figure 15: Reasons for supporting the introduction of Selective Licensing (coded comments)



Reasons for opposing a Selective Licensing scheme

Respondents who say they do not support a Selective Licensing scheme were also asked to give their reasons why. 181 respondents commented. The most common reason cited is that it will 'raise rents and/or diminish housing stock' (48 comments), followed by it being a 'money making scheme/another tax' (39 comments) and that it is 'unfair to landlords/already doing a good job' (36 comments).

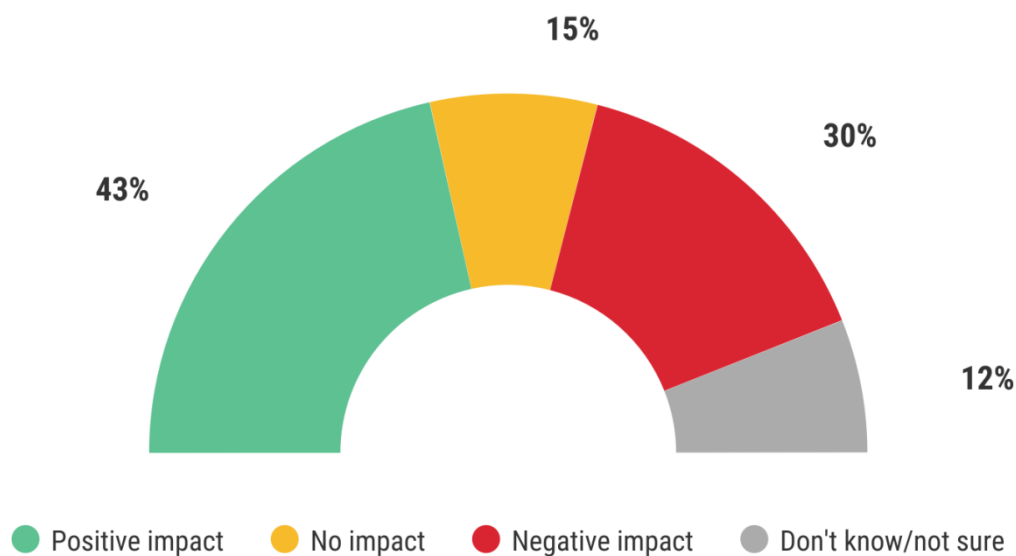
Figure 16: Reasons for not supporting the introduction of Selective Licensing (coded comments)



Likely impact on respondents

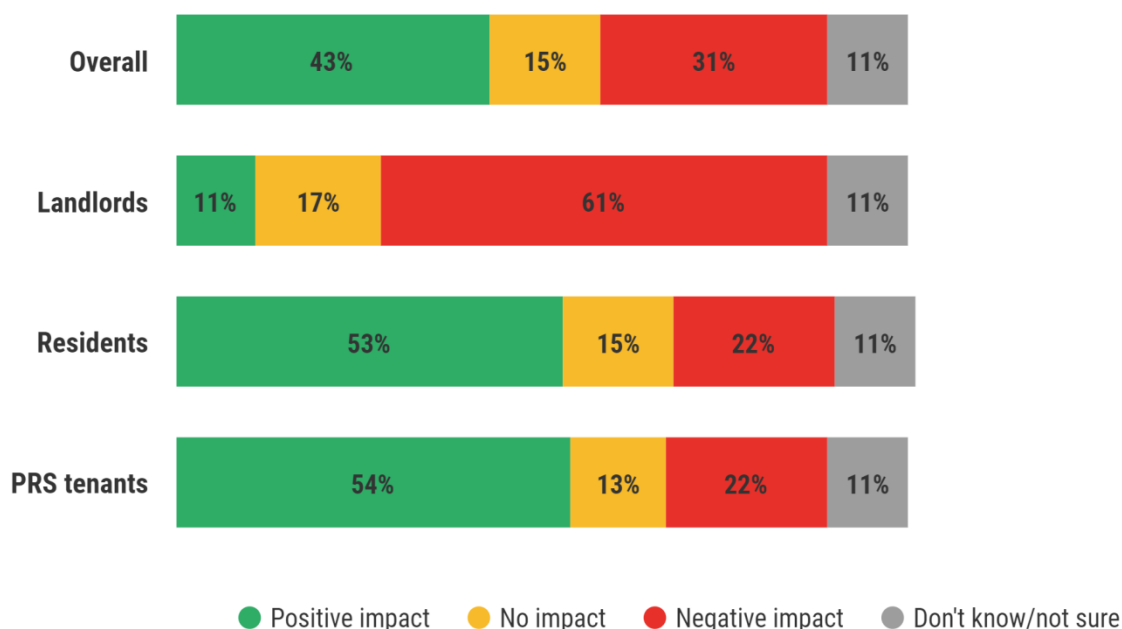
Respondents were asked what impact, if any, introducing a Selective Licensing scheme will have on them. Just under six out of ten respondents overall (58%) feel it will have a positive impact. However, three out of ten (30%) feel it will have a negative impact.

Figure 17: Likely impact of introducing Selective Licensing in Haringey (overall)



Residents and PRS tenants are again most positive, with 53% and 54% respectively saying a Selective Licensing scheme will have a positive impact on them. However, around one in five for both groups (22%) feel it would have a negative impact on them. Landlords are very much negative, with six out of ten (61%) saying it will have a negative impact on them and only one in ten (11%) saying it will have a positive impact on them.

Figure 18: Likely impact of introducing Selective Licensing in Haringey (by respondent type)



Comments on the impact of Selective Licensing

Reasons why Selective Licensing will have a positive impact

Respondents who said Selective Licensing will have a positive impact on them were asked to say why. 182 respondents commented. Many of the reasons are the same as those for Additional Licensing. The most common reason is that respondents feel it will 'positively affect neighbours and local area by tackling ASB, fly tipping and overcrowding' (85 comments), followed by it resulting in 'better quality housing/living conditions' (73 comments) and that it 'holds landlords to account' (50 comments).

Reasons why Selective Licensing will have a negative impact

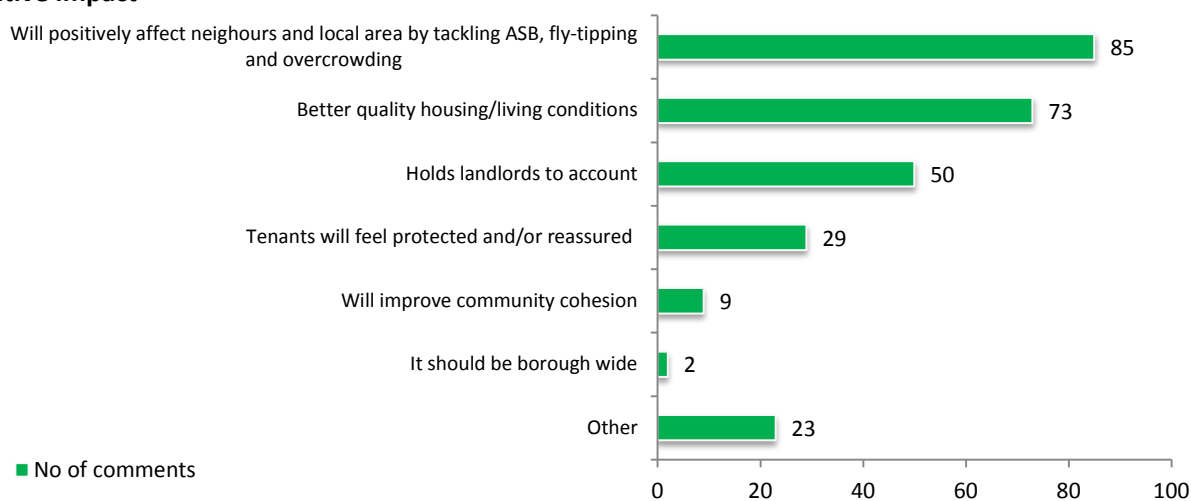
154 respondents provided comments on why they said that Selective Licensing will have a negative impact on them. Again, many referred to their previous comments for Additional Licensing. The most common reason is again that it is 'unfair and costly to landlords (especially small/good landlords)' (77 comments), followed by 'costs will be passed onto tenants' (47 comments) and that there will be 'less available housing' (21 comments) and that it will not be 'effective in addressing the problems' (also 21 comments).

Reasons why Selective Licensing will have a no impact

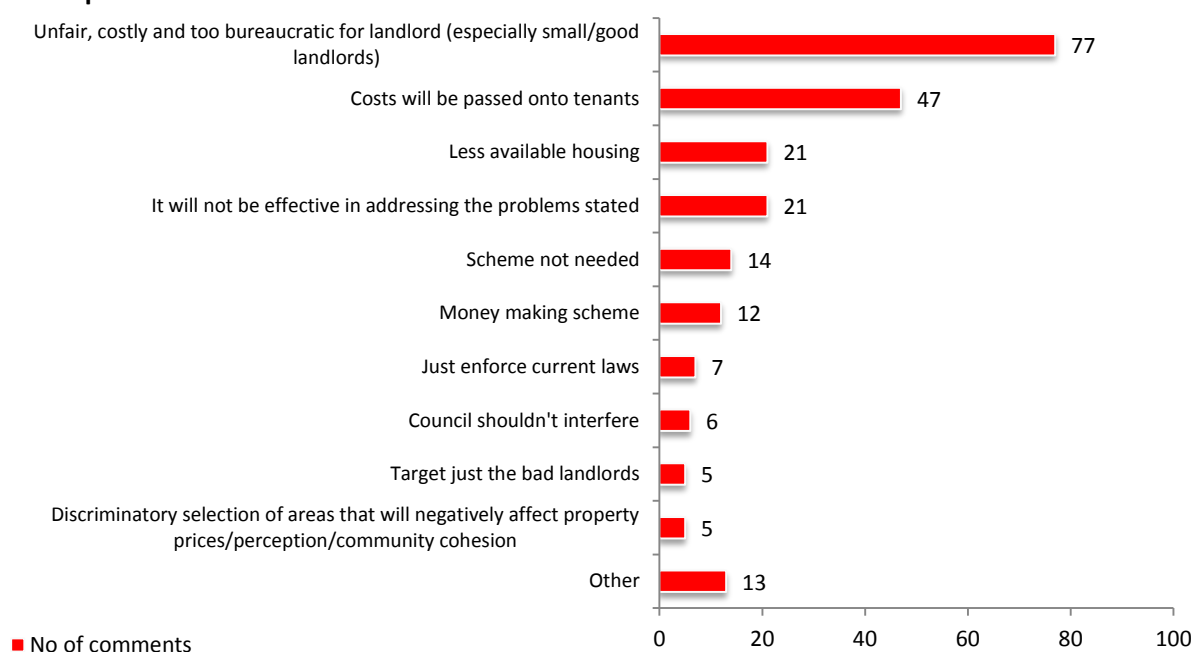
Finally, those who said that licensing will have no impact were asked to give reasons why (66 responses provided). Again, comments are often the same as those made to the question around Additional Licensing. The most common reason given is that it will have 'no impact on me personally' as they don't rent/live in a selective licence area or own a property (27 comments), followed by a scheme 'will not solve the problems' (16 comments) or that their 'property is already in good condition' (11 comments).

Figure 19: Comments on reasons given for impact (coded comments by positive, negative and no impact)

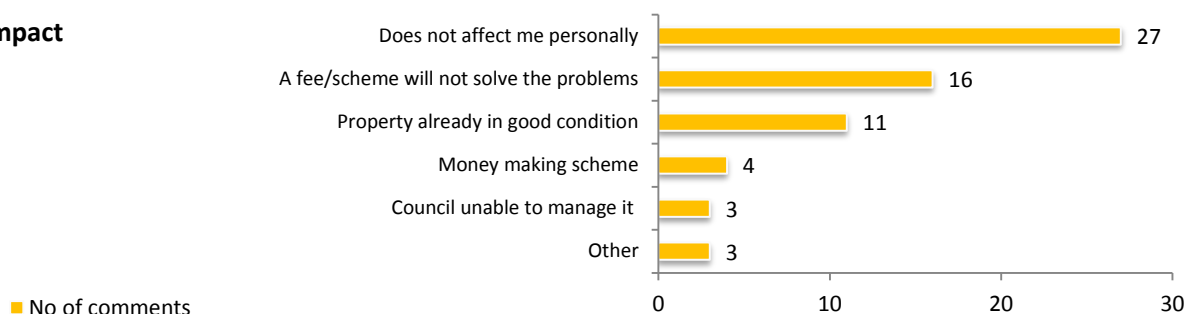
Positive impact



Negative impact



No impact

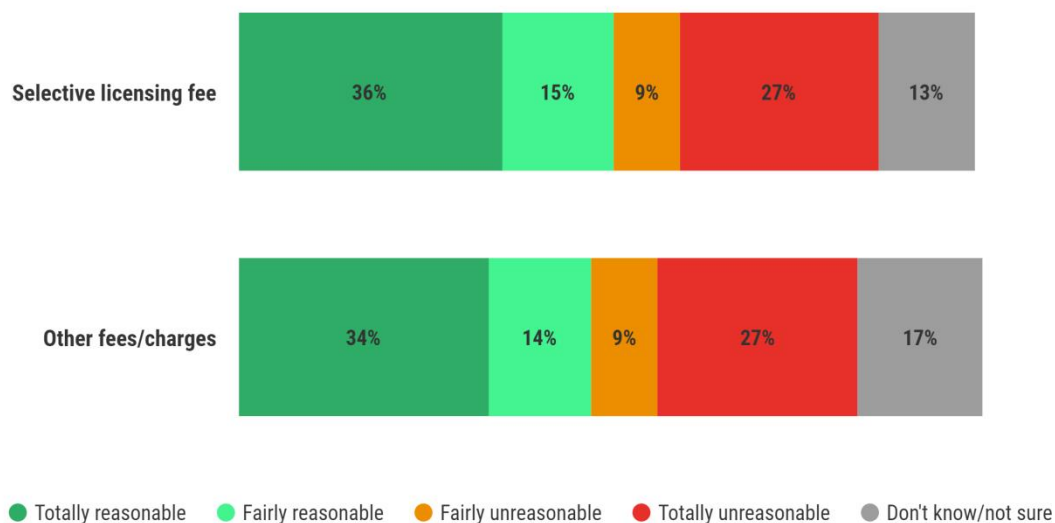


Selective Licensing fees

Respondents were asked to comment on the proposed fees for a Selective Licensing scheme of £500 for a five year licence (excluding any discount or Additional costs), along with a question about other fees and charges associated with the scheme.

Around half of respondents (51%) feel that the proposed Selective Licensing fee is reasonable. However, over a third (36%) feel it is unreasonable. Views are very similar when asked how reasonable respondents feel the other fees/charges are (48% reasonable and 36% unreasonable), with a slightly higher proportion saying that they don't know/are not sure (17%).

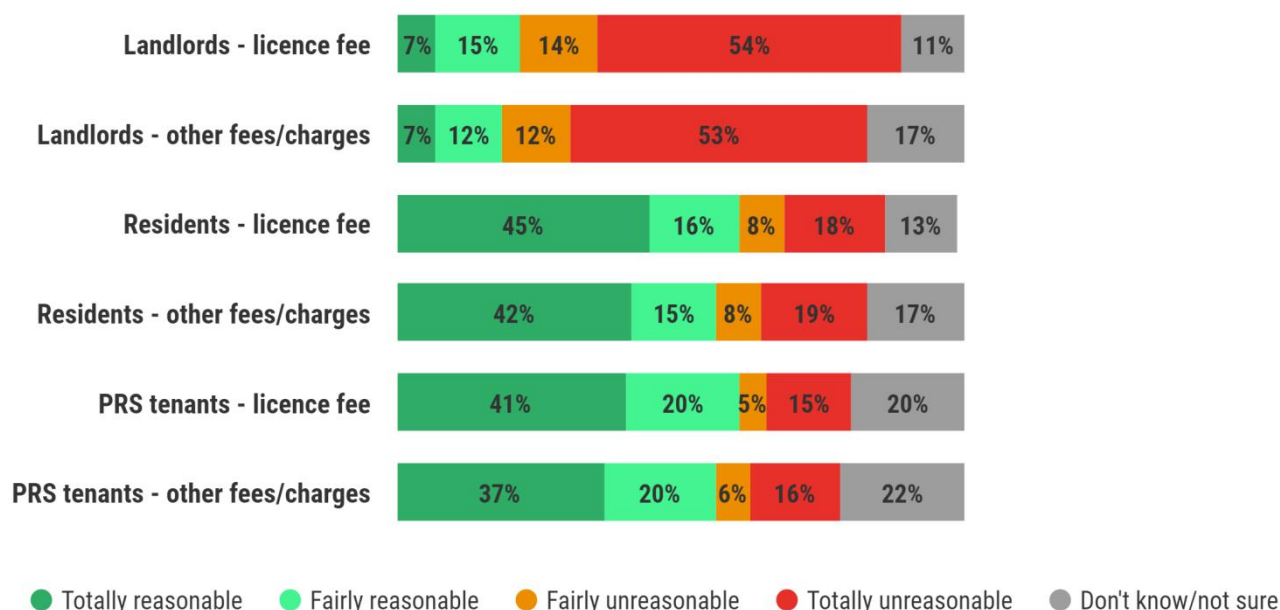
Figure 20: How reasonable is the proposed Selective Licensing fee and other fees/charges (overall)?



Residents and PRS tenants share similar views, with six out of ten respondents from each group (61%) saying the Selective Licence fee is reasonable. However, around a quarter of residents (26%) feel it is unreasonable, compared to a fifth of PRS tenants (20%). Landlords are very negative about the cost of the fee, with around two thirds (68%) saying it is unreasonable (54% of which feel it is totally unreasonable), whilst only a fifth (22%) feel it is reasonable.

Results are similar for the other fees/charges for Selective Licensing, although a slightly higher proportion of respondents across all groups say they don't know, whilst slightly fewer feel they are reasonable.

Figure 21: How reasonable is the proposed Selective Licensing fee and other fees/charges (by respondent types)?



Comments on Selective Licensing fees

Reasons why Selective Licensing fees and other fees/charges are reasonable

Respondents who said that the licence fee is reasonable, were asked to say why. 167 respondents made comments. Again, we see comments often identical to those made for Additional Licensing. The main reasons given are that the licence fee is 'affordable in relation to the rental income' (45 comments), followed by it being affordable and 'justifiable for landlords to be responsible' (36 comments) and that it will 'cover the cost of managing/enforcing the scheme' (29 comments).

151 respondents said that the other fees/charges are reasonable. The top 3 reasons given are the same as above: that the other fees/charges are 'affordable in relation to the rental income' (34 comments), that they are affordable and 'justifiable for landlords to be responsible' (also 34 comments) and that they will 'cover the cost of managing/enforcing the scheme' (26 comments).

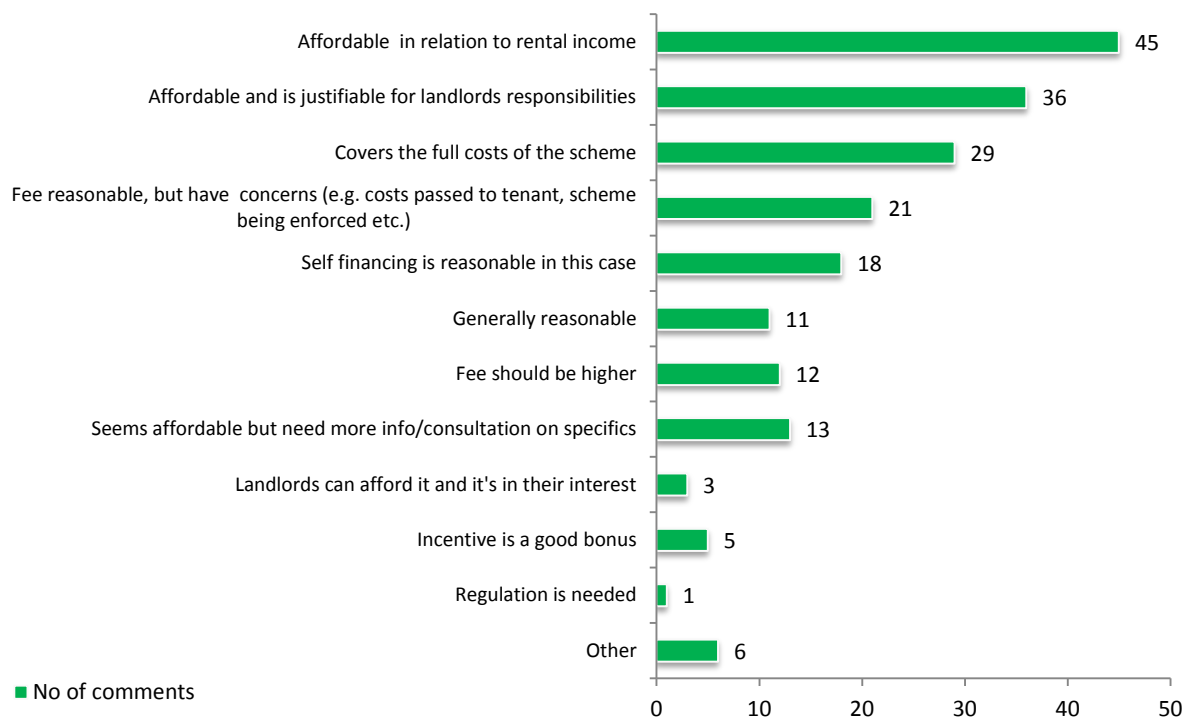
Reasons why Selective Licensing fees and other fees/charges are unreasonable

Those who said the licence fee is unreasonable were asked to give reasons why. 144 respondents made comments. The most common reason given is that it is a 'money making scheme/another tax' (41 comments) followed by it being 'unfair/expensive in light of the new tax/expenses regulations for landlords' (39 comments), and that it will impact negatively on 'affordability for tenants/costs will be passed on/less housing available' (34 comments).

144 respondents said that the other fees/charges are unreasonable. The top reasons given are very similar to above: that the scheme is a 'money making scheme/another tax' (36 comments), that it will 'impact negatively on 'affordability for tenants/costs will be passed on/less housing available' (29 comments). This is followed by it being 'unfair/expensive in light of the new tax/expenses regulations for landlords' (26 comments).

Figure 22: Comments on whether licence fee is reasonable/unreasonable (coded comments by response)

Reasonable



Unreasonable

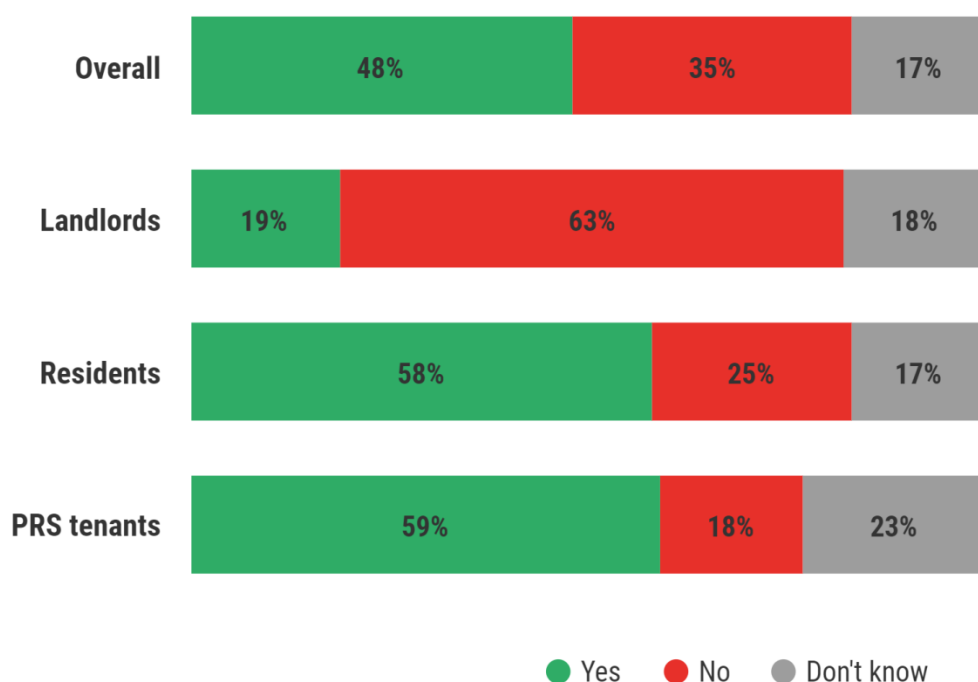


Selective Licensing conditions

Respondents were asked whether they feel the Selective Licensing conditions (provided as a separate document) are reasonable, and whether they will help to improve the standard of private rented housing.

Just under half (48%) of respondents agree that the Selective Licensing conditions are reasonable, and that they will help improve the standard of private rented housing, whilst around a third (35%) said they did not agree.

Figure 23: Are the Selective Licensing conditions reasonable and will they improve standard of PRS housing (overall and by respondent type)?



Just under six out of ten residents and PRS tenants (58% and 59% respectively) feel that the Selective Licensing conditions are reasonable and will improve housing. A quarter of residents (25%) say they are not reasonable, which is slightly higher than PRS tenants (18%). Landlords are again far more negative, with only a fifth (19%) agreeing they are reasonable/will help improve housing, whilst over six in ten (63%) do not agree. These figures show that Selective Licensing is viewed more negatively than Additional Licensing, in terms of the conditions and belief that it will help to improve the standard of private rented housing.

Comments on Selective Licensing conditions

Reasons why Selective Licensing conditions are reasonable and will improve standards

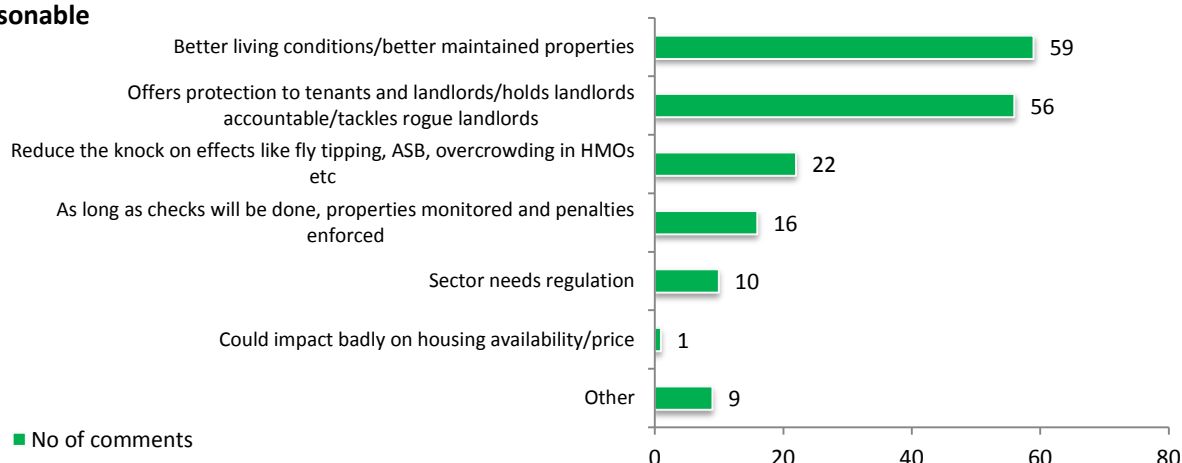
Respondents who said that the selective licensing conditions are reasonable and will improve standards of private rented housing were asked to give their reasons why. 124 valid comments were made, although many referred to their previous comments and are not necessarily specific to the conditions. The most common responses are the same as those given for additional licensing: that they will create 'better living conditions/better maintained properties' (59 comments), followed by them 'offering protection to tenants and landlords' (56 comments) and that they will 'reduce the knock on effects such as ASB, flytipping etc...' (22 comments).

Reasons why Selective Licensing conditions are unreasonable and will not improve standards

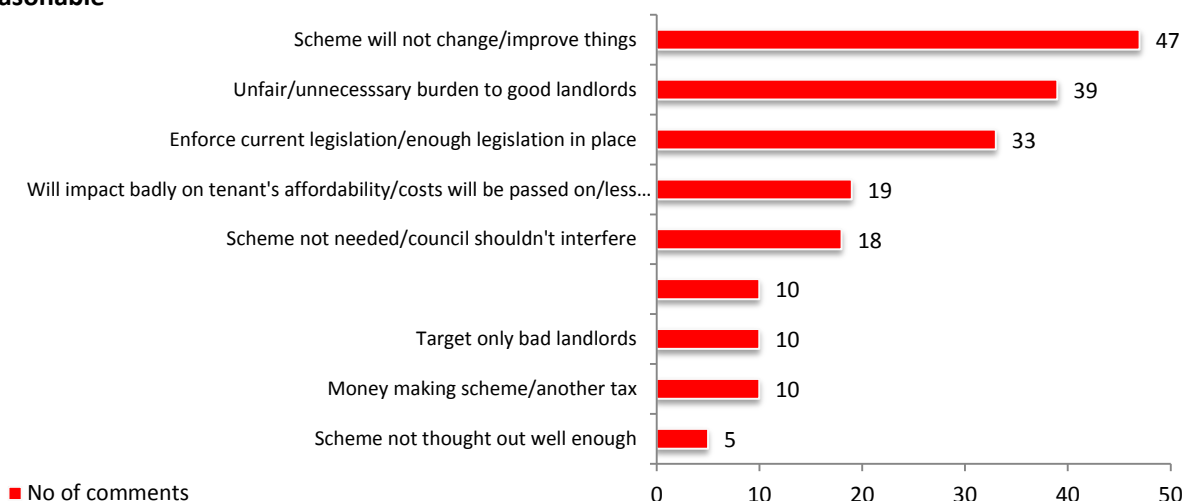
142 valid comments were given by those who said that the licensing conditions are unreasonable and will not improve standards of private rented housing. Again, many referred to their previous comments and the scheme in general rather than specifically about the conditions. The most common reason given is that they 'will not change/improve things' (47 comments), followed by them being an 'unfair/unnecessary burden to good landlords' (39 comments), and that the council should 'enforce current legislation' (33 comments).

Figure 24: Comments on whether licence conditions are reasonable/unreasonable (coded comments by response)

Reasonable



Unreasonable



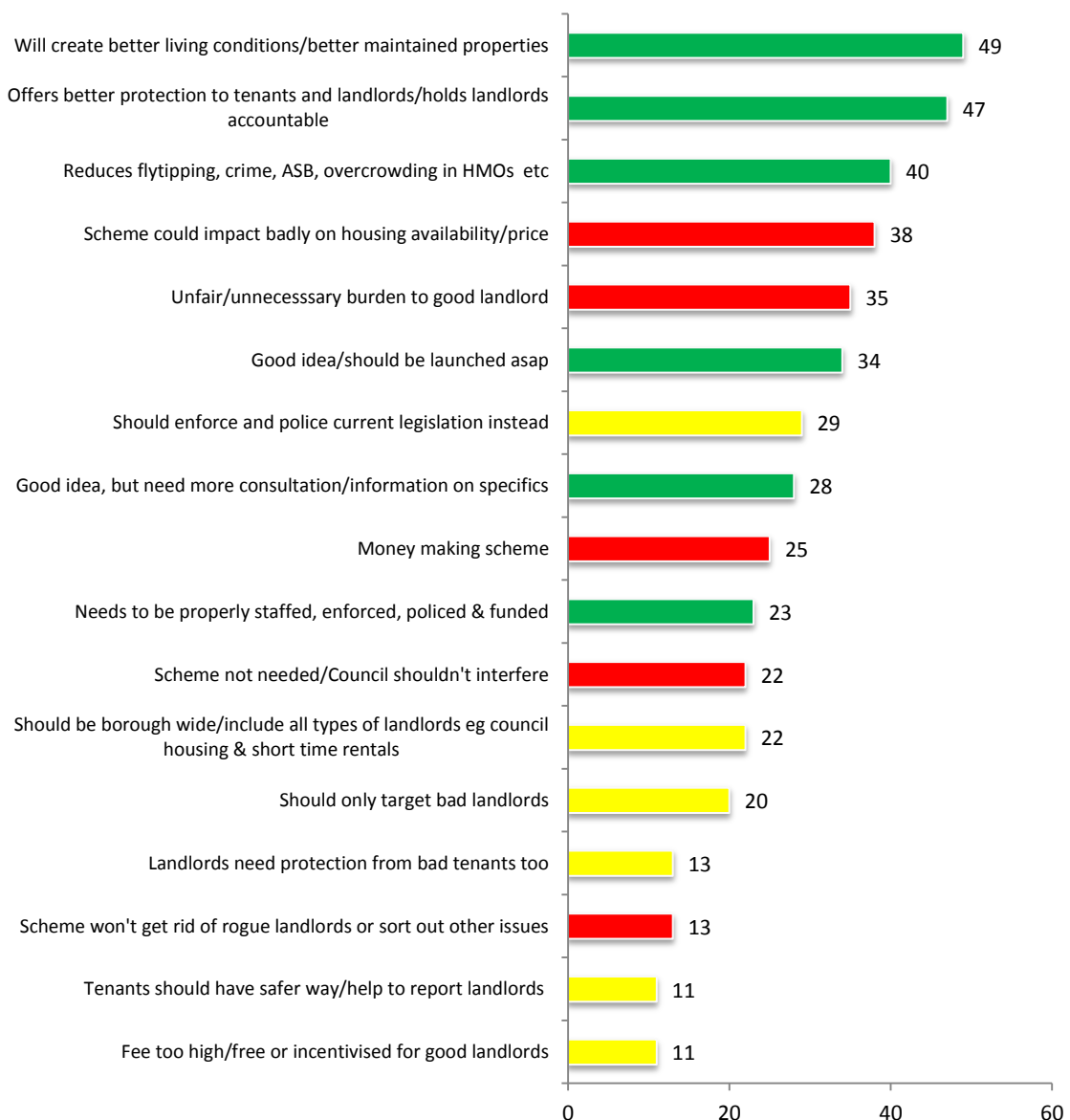
Any other suggestions/comments

Finally, respondents were invited to add any further thoughts they had on either the consultation as a whole or any ideas on what else the council may want to consider. In total, 237 valid comments were analysed and coded by 'theme'. Where fewer than 10 comments were made, these have not been included in the analysis.

A graph of the most common responses coded by theme, is presented below. Codes highlighted in green show positive comments about the scheme and in red where they are negative. Codes in yellow are suggestions/ideas on what the council should do. The most common response is that licensing is a good idea and will 'create better living conditions /better maintained properties' (49 comments), with a similar number saying that it is positive and will 'offer better protection to tenants and landlords' (47 comments). This is followed by it being positive in 'reducing flytipping, ASB, crime, overcrowding etc...' (40 comments).

A full breakdown of individual responses has been provided to the council. Please note that many of the responses simply say 'refer to my previous point' and have been repeated across many of the free text sections, therefore there is repetition.

Figure 25: Further comments on the consultation or ideas that the council could consider (overall)



Feedback from public meetings & other responses

M·E·L Research facilitated four public consultation meetings across Haringey during the consultation period, in Highbury, Northumberland Park and the Civic Centre. Some were targeted specifically at landlords and agents, while others had a more mixed audience, including tenants and local residents. There were also a number of written responses to the consultation. Below is a summary of the views from both the written responses and the feedback from the public meetings.

Overall support or disagreement

- Unsurprisingly, there were split views from different types of stakeholder. Landlords generally opposed either licensing scheme, particularly the Selective Licensing one as proposed. Local residents were most vocal in their support, though the fewer tenants present were broadly in support of the licensing schemes.
- Support for Additional Licensing was stronger than support for Selective Licensing. Lots of people were confused about the difference between the two schemes, the locations and types of occupation that would be included. Many preferred a borough-wide Selective Licensing scheme. That way, all privately let properties would fall within the same scope across the borough. If not, because LSOAs are being used, they can sometimes seem arbitrary and occasionally cut a road in half or leave out known problem streets.
- Landlords across the meetings felt that the schemes would be unfair on them, penalising them financially for the impact of rogue landlords, who would evade licensing. Others felt it unfair on smaller landlords with fewer properties, not just the fee but the accompanying investment needed in properties to bring them in line with the licensing requirements.
- There was wide confusion over the definition of an HMO, particularly for properties that may sometimes fall within the definition of an HMO and sometimes not. For example, if a two-bedroom property was let originally to a couple, that counts as a family dwelling. But if the spare room is let to a third person sharing facilities, that property becomes an HMO. There was also some confusion among landlords about which conversions counted as self-contained and which didn't, therefore falling within the HMO definition.

Impact on the private rented sector

- Local residents were the most supportive of the licensing schemes, usually because they were currently being affected by the behaviour of private tenants in their immediate neighbourhood. There were repeated complaints about rubbish and fly-tipping, unkempt properties, high turnover, noise nuisance, broader ASB etc. The residents were most hopeful that the licensing schemes will make a difference.
- Tenants, in contrast, had more mixed views about the likely impact. They believed that the increased cost would be passed down to them in higher rents, especially in year 1 of the schemes, as it's an immediate cost to the landlord rather than spaced out over the five-year licence. Though they'd value improvements to their neighbourhoods, some questioned the actual impact either licensing scheme would have on the local area.
- Landlords were the most sceptical about the impact either licensing scheme would have on the private rented sector in Haringey. In one group, almost entirely with landlords, the sole benefit was if the schemes

got the bad landlords out of the way, as they give the whole sector a bad name. However, most landlords across the meetings questioned if this would happen.

- Admittedly, rogue landlords are least likely to come to such public meetings; the landlords present believed themselves the good landlords. Landlords called the schemes, especially those likely to be affected by Selective Licensing, as a “tax on good landlords” to pay for LB Haringey to tackle the impact of rogue landlords. If not, landlords described them as added protection for bad tenants who complain, don’t pay rent and game the system until they’re evicted. If so, this is a loss of income for the landlords during this time.
- A lot of participants wanted to see an improvement in rubbish and fly-tipping. If the licensing can improve this, they would see an immediate benefit. In fact, some people would prefer funding to be targeted at rubbish removal, a very visible impact.
- A few people hoped that Additional Licensing would stop landlords converting properties into HMOs with tiny rooms, e.g. letting out the lounge and converting the attic, because of extra conditions and extra financial cost of the fee.
- Landlords spoke about the potential negative impact from the licensing schemes, particularly the loss of rental properties in Haringey, especially HMOs. If the cost increases to let these out within the law, then HMOs may become unaffordable, they argued. The schemes could even deter new landlords from entering the market. And what might the market for HMOs look like in future, anyway, others said.
- Another potential downside is that increasing the cost of private renting in Haringey may make it unaffordable for tenants to live there, thus forcing them to move somewhere else.
- There were also concerns about what happens once bad tenants are evicted. Would they receive homelessness support, for example, which then costs Haringey Council more? Some of these tenants may well be deemed intentionally homeless, though.
- One final worry about the impact of Selective Licensing as proposed was that it “stigmatises” the designated areas as bad areas, which will affect desirability, mortgage lending (particularly buy to let mortgages) and property prices. The NLA suggests that this could deter investment in these areas as well as reduce the number of mortgage lenders willing to lend on properties in the area, whilst also being likely to increase car and house insurance premiums.
- There were questions about the evidence, both to decide about designations but also about the impact licensing has. Several people queried the correlation rather than association of ASB and private renting, while others weren’t swayed by the thin evidence on the impact of licensing within Haringey or elsewhere.
- Generation Rent identified the positives that licensing has brought, by highlighting Newham Council. In contrast to Haringey, Newham have undertaken 1,914 more inspections and actioned 600 more prosecutions than Haringey in the last 2 years (2015-17), suggesting that this is down to licensing.

Costs/fees

- There was less discussion about the fees. While some landlords were against any extra cost for them, see as “an extra form of taxation”. One landlord at the Northumberland Park meeting, however, thought the cost was pretty low, especially when expressed per year (£50 in his case).
- Landlords were concerned that the total cost would become expensive for HMOs. One landlord suggested a fee of £50 per room would be more reasonable.

- As noted above, landlords and tenants felt the extra cost of fees but also Additional work needed would eventually end up in higher rental costs, so an impact on affordability. One landlord said explicitly that he would increase rents.
- There were worries about how the fees would change – increase – over time, within the five-year scheme but beyond that too.
- There were several suggestions for discounts for accredited landlords or other good, compliant landlords.
- Others suggested banding fees, e.g. based on the number of properties you're licensing, the number of units within HMOs or for better, compliant landlords.
- Some landlords believed that licensing would lead to loss of income, either because rent may be repaid if a licensable property doesn't have a licence or because bad tenants are playing the system and lodging false complaints. There was ill-feeling about loss of income if the problem was considered the tenant's responsibility, e.g. not disposing of rubbish properly or loud music.
- Some questioned whether the fee will cover enough inspections rather than based simply on the level of fees charged by other boroughs. There was a concern that the admin cost, time and backlog would take up council resources, which then aren't directed at tackling bad landlords but simply administering the new schemes. The NLA and a number of landlords questioned whether the costs would cover inspections for every single property, which would need to happen to ensure properties meet the standards required.
- One person suggested starting with the cost of sorting out the problems and then working back to decide right fee.
- One more suggestion was using fines around HHSRS to pay for this. Another was to increase council tax instead.

Areas included/excluded from the Selective Licensing area

- There were 11 written responses (out of 18) that were from residents, landlords and tenants living in Milton Park (Highgate Ward). All 11 respondents object to the Selective Licensing scheme being considered for Milton Park, particularly as the scheme is only proposed for the even numbered side of the road.
- Respondents question the evidence upon which Milton Park's inclusion (even numbered side of the road) has been based, citing that it is a 'prosperous' part of the borough, with little/no crime, ASB or litter. The comments particularly question why the one side of the road has been singled out to be included in the Selective Licensing scheme, whilst the other side has been excluded.
- In contrast, the response from Haringey Citizens/Generation Rent suggest that there are many issues with the PRS in Seven Sisters, this has not been included within the Selective Licensing area, citing St Ignatius Primary School and St Ignatius Church as having experienced 'numerous cases of rogue landlords in the Seven Sisters area'. They urge that Seven Sisters is therefore considered for inclusion.

Alternatives to licensing

- There were a number of alternatives suggested in place of licensing or amending the proposed licensing schemes. Two stand out: use existing powers and make the Selective Licensing scheme borough-wide.

- Many respondents suggested simply using existing powers. “Don’t we have enough laws already?” one said. If anything, they wanted better enforcement using the current legislation, including unannounced property visits, more door-knocking and taking court action. The NLA cited Haringey Council having only prosecuted 7 landlords and serving 33 improvement notices in 2016, suggesting this is either because there is no problem in Haringey, or that they are not using the powers they have.
- With Selective Licensing, the most popular alternative from many people was for a borough-wide scheme. That way, all privately let properties would fall within the same scope across the borough instead of what is seen as “random” areas. This was seen as fairer and would also bring down the total cost, so would reduce the fee.
- Many suggested landlord accreditation schemes should be sufficient, as these lay out similar standards which landlords sign up to adhere to.
- Targeting problem tenants themselves was suggested to be something that the council should do, rather than just landlords, as tenants are often the cause of the problems rather than the property themselves. The NLA asked that the council develops a strategy that includes action against any tenants who are persistent offenders. Several residents who attended the public meetings were there because they similarly suffer from persistent problem neighbours who are privately renting properties.
- Haringey Citizens/Generation Rent suggested (in addition to selective licensing) that Haringey should sign up to the Mayor of London’s rogue landlord checker, an online database that allows tenants to check if their potential landlord has been convicted of a housing offence in the last year.
- Other alternatives are:
 - Increase the level of fines within the existing system to deter rogue landlords
 - The landlord paying a deposit to Haringey Council, used as security
 - Provide information to tenants about what a landlord should be doing, to put power in tenants’ hands
 - Do nothing, effectively leave for the market to resolve the problems; is this simply the council acting as a “nanny state”, a local resident said
 - Work involvement from councillors on the ground, similar to residents encouraging other neighbours to complain
 - Tackle the symptoms (e.g. rubbish, fly-tipping) rather than the cause, so using the funds to remedy the issues rather than enforce conditions
 - Install CCTV with the money, providing evidence to prosecute people, e.g. for fly-tipping
 - Involve the police more with ASB
 - Rely on planning rules, e.g. Article 4 Direction needed to convert to an HMO in east Haringey
 - Collect information about let properties and landlords through the council tax
 - Gain information from Inland Revenue or Housing Benefit records on landlords.

Other comments

- The NLA queried whether the Council had considered how licensing will tackle 'rent-to-rent', subletting and Airbnb, which are done by the tenants themselves, without the landlord's knowledge.
- There were several queries over definitions. As well as those included above, some wondered about the relationship between licensing and planning, including retrospective planning permission and how this relates to the definition of an HMO. There were several questions about how many units would need to be licensed within an HMO. Is it the number occupied at the time or the total possible? Would refunds be given if licensed units then become vacant? There were questions about live-in landlords. A final query was about whether minimum room sizes will be introduced this year and who will be affected most, e.g. students.
- There was some ill-feeling about Haringey Council, such as the lack of council action in tackling previous PRS-related complaints from residents, as well questions over the difference these licensing schemes would make. Would they have teeth? What extra enforcement would take place? In fact, some local residents would like to be involved in the scheme, potentially to police it alongside Haringey Council.
- There were several discussions and comments via the written responses about who is responsible for things. Is it really private landlords' responsibility to tackle the behaviour of their tenants, e.g. ASB? Isn't it better for the tenants to be held responsible for this themselves, people argued. Some queried what happens with ASB among social rented tenants and homeowners, questioning the fairness in approach proposed with PRS licensing.
- A few people spoke about the licensing standards or conditions. They should include about maintaining property, bins/fly-tipping, property conditions, gas checks and extra penalties for people repeatedly breaking the law.

Appendices

Appendix 1: Map of proposed Selective Licensing areas

Appendix 2: Consultation document

Appendix 3: Survey

Appendix 4: Email and written responses to consultation

Appendix 5: National Landlords Association response

Appendix 6: Haringey Citizens/Generation Rent response

Appendix 7: Neighbouring borough responses to survey (marked up questionnaire)

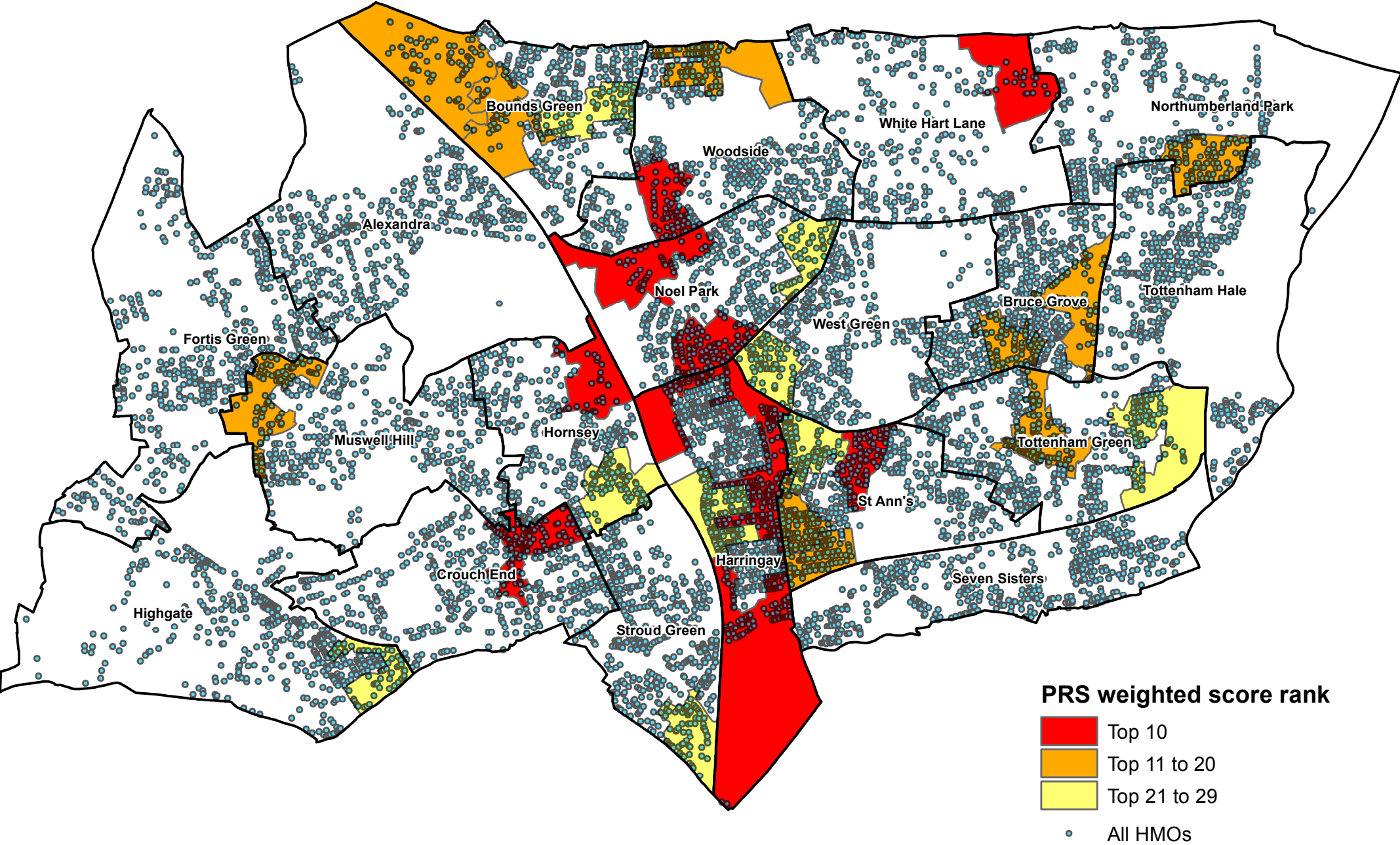


m.e.l
research



Appendix 1: Map of proposed Selective Licensing areas

All HMO properties overlaid on top 29 PRS weighted score by LSOA



Appendix 2: Consultation document

Additional and Selective Licensing – Consultation proposal

What is property licensing?

There are three types of licensing schemes councils can use to regulate private rented properties in their boroughs. Two of the schemes relate to Houses in Multiple Occupation – often referred to as HMOs. An HMO usually has a shared kitchen, bathroom and sometimes a shared living room (*known as amenities*).

Mandatory Licensing – Since 2004, all councils have had to run a licensing scheme for large HMOs. Any HMO that has three or more storeys with five or more people living as two or more households and sharing amenities has to be licensed.

Additional Licensing – Councils can introduce Additional Licensing to cover any other type of HMO in their area.

Selective Licensing – this type of scheme covers **all other** privately rented properties.

Why is Haringey considering licensing?

The number of private rented properties in Haringey has increased by over 45% (over 10,000 properties) between 2001 and 2011. The private rented sector now makes up a third of all housing in the borough.

A well-managed private rented sector is important as many more residents are now living in private rented homes. Many landlords provide decent accommodation and abide by the rules. However, we know that some landlords rent out properties that are in poor and often unsafe condition. As a council, we often receive complaints from residents about the condition and poor management of private rented properties in their area. Rubbish dumping, loud noise and general anti-social behaviour (ASB) are among the most common complaints we receive.

Similarly, we receive complaints from tenants living in rented properties. Ongoing problems with cold and damp, outstanding repairs, lack of basic amenities and security measures often feature in the list of complaints. These problems are common place in HMO type properties.

Haringey already has two licensing schemes – a Mandatory Scheme for larger HMOs and a scheme in the Tottenham area for smaller HMOs. We know from running these schemes that there is a need to put compulsory measures in place to secure an improvement in our private rented housing stock.

We want to improve the standard and safety of private rented housing and address anti-social behaviour, as this will benefit private tenants, landlords and greatly improve the generally appearance of the borough.

Introducing licensing will:

- Help us to work with landlords, offering them guidance and support to ensure that homes are safe and well managed.

Additional and Selective Licensing – Consultation proposal

- Promote a professional approach to management amongst private landlords.
- Allow us to more easily take action against landlords who provide poor standard of accommodation and whose tenants cause a persistent level of anti-social behaviour.
- Improve the local environment such as less dumping of household rubbish.
- Added protection for tenants and the council no longer relying on the tenant or neighbours to report poor property conditions.
- Allow us to employ more staff to check that the properties meet the licensing conditions, without increasing the cost to the tax-payer. Licensing schemes are self-funding.

Existing powers available and alternative action.

Existing powers available to the council are largely reactive with officers responding to tenants' complaints. Many tenants are reluctant to complain through fear of retaliation. Although current enforcement activity has been successful in resolving problems in individual properties, it is not felt to have raised the standard of the private rented sector generally. Responding to complaints often involves more than one council department, using various pieces of legislation. This is time consuming and often means that problems are not resolved quickly.

Through our existing licensing schemes, we know where private rented properties are and more importantly who the landlord or managing agent is. This means that we can be proactive in checking that properties are up to standard and that important safety measures, such as up to date gas safety certificates, are in place.

We did consider whether it could take any other course of action. This included:

- **Do nothing and continue with existing legal powers** - Existing powers available to the council are largely reactive with officers responding to tenants' complaints.
- **Voluntary Accreditation** - A voluntary accreditation schemes relies on the willingness of landlords to sign up to it. This will not address the problem of rogue landlords or inexperienced landlords as they are unlikely to sign up.

Having considered all the other options available, we believe that the two proposed licencing schemes are the best tools available to tackle problems of poor housing conditions and property related anti-social behaviour (ASB).

How licensing fits with the Council's wider plans.

Our Housing Strategy supports the growth of the private rented sector in Haringey and the improvement of our existing housing stock to benefit all households.

Additional and Selective Licensing – Consultation proposal

Schemes such as licensing can improve the quality of the sector by eliminating poor management practices and property conditions and reducing ASB that can adversely affect a neighbourhood.

We have ambitious plans to regenerate the borough, provide more housing and improve the condition of existing housing. We believe that good quality housing is a basic right of every resident.

Our plans for regenerating Tottenham and Wood Green will greatly transform the borough; landlords will benefit as these areas will continue to grow and thrive. Licensing will make a big difference and contribute to achieving the council's aims.

We know that homelessness is an issue in Haringey – we have thousands of households living in temporary accommodation because they are homeless. The main reason for homelessness is loss of a private rented tenancy. Licensing will tackle poor management that leads to households losing their homes and becoming homeless. It will also help to build a relationship between the council and landlords and identify those who may be willing to work alongside our homelessness team to provide temporary accommodation.

Problems with anti-social behaviour (ASB), crime and fly tipping.

We have spent many months analysing: complaints; information we hold on private rented properties and information held by other partners such as the police. The information has been used to look at how problems in Haringey compare with other boroughs, whether there is a link between private rented properties and incidents of crime and ASB and to identify those parts of the borough that experience more problems than average. The information has told us that:

- Crime and ASB rates in Haringey are above the national and local average.
- Fly tipping (rubbish dumping) is costing the Council approximately £3 million per year.
- 18 out of 19 wards in the borough have above average rates of private rented stock.
- Approximately, 35,500 properties in Haringey are now privately rented and approximately 50% of the 35,500 properties are HMOs.

Please read our [analysis of high level ASB, crime, etc. \(PDF, 2.4MB\)](#) for more details.

When we considered whether there was a link between complaints, crime, ASB and private rented homes, the information told us that of the:

- 19,942 noise complaints received – 80% related to private rented properties.
- 13,585 incidents of environmental crime recorded (rubbish dumping etc.) – 49% related to private rented homes.
- 1,041 complaints of serious breaches of health and safety property conditions (Category 1&2 complaints) received, 69% related to homes that were privately rented.

Additional and Selective Licensing – Consultation proposal

(above relate to one year's data between January 2015 and December 2016)

Having considered all the data, the council came to the conclusion that all HMOs in the borough needed to be licenced. However, in considering whether there was a case for introducing Selective licensing for all other types of private rented properties, we felt that, based on the evidence, a scheme was needed for some of the properties but not all.

In deciding which properties should be considered for a Selective licensing scheme, the council agreed the priority areas based on the criteria below:

- Areas with equal to, or higher than, the London average for private rented properties – this is currently 26%, significantly higher than the national average of 19%.
- Areas scoring the highest for poor housing conditions, ASB and crime.

In order to target those areas in greatest need, we applied the above criteria to Lower Super Output Areas (LSOAs). LSOAs are recognised geographical areas and are most noticeably used for conducting the Census.

The use of the LSOA framework does mean that in some instances the areas chosen either split streets in two or have other irregular boundaries. We did consider reworking the boundaries, but to do this would mean applying a level of subjectivity to a process that has been wholly evidence based. It would also make it more difficult to measure the success of the scheme over time.

The above process highlighted 29 areas that all have a higher than London average number of private rented properties and a significant and persistent problem with private rented property related ASB. We are therefore suggesting that the 29 LSOAs should make up a selective licensing scheme.

Please refer to the [maps detailing the roads/areas included within the proposed 29 Selective Licensing Areas \(PDF, 5.4MB\)](#) for more details.

What is Haringey hoping to achieve by introducing a borough wide licensing scheme for HMOs and a smaller scheme for all other private rented properties?

Our main driver for extending our additional licensing scheme borough wide and introducing a smaller selective licensing scheme is to improve housing conditions. We also want to improve the quality of life for residents by tackling ASB and environmental crime associated with poorly managed private rented properties. Our aim is that over the five-year period of the licensing schemes, the following outcomes will be achieved:

- Improved housing conditions

Additional and Selective Licensing – Consultation proposal

- A reduction in significant persistent problems caused by anti-social behaviour, including environmental crimes such as fly tipping.
- Reduced levels of property related crime such as burglary.
- An increase in good landlords and an elimination of rogue landlords

We believe that licensing will make a significant contribution to improving the borough and provide an added layer of protection for private tenants.

The Council's proposal

The Council is proposing two schemes:

Additional Licensing – A borough wide scheme that will require all HMOs in Haringey to be licensed. This will include the category of HMO which is often referred to as a section 257 HMO. Section 257 HMOs are where the building was converted into self-contained flats before the 1991 Building Regulations came into force on 1st June 1992 and have not been subsequently improved to at least the 1991 standards.

Selective Licensing – a scheme that will require all other privately rented properties located in the 29 LSO areas to be licensed,

Licensing Conditions – The conditions are a set of standards that landlords have to follow for both the condition of the property and the way the property is managed. Most of the conditions contain standards that landlords should already be following such as issuing a tenancy agreement at the start of the tenancy and ensuring that annual gas safety checks are carried out.

Licensing fees.

In setting the licence fee we have estimated how much it will cost to run the scheme. The council cannot make a profit from the scheme, but it must charge enough to make sure that all costs are covered.

A licence would normally be granted for a five-year period and no further fees would be payable during that time. A licence cannot be transferred to another person; therefore, a change of licence holder would require a new application for which the full fee would be charged.

The council will offer a **50% discount** for those applications made during the first three months of the scheme, before the designation comes into force. For example, the full cost of a selective licence for a five-year period is £500. This will reduce to £250.

The fees are detailed overleaf:

Additional and Selective Licensing – Consultation proposal

Fee Schedule

Type of licence	Cost	Annual Equivalent	Weekly Equivalent
Selective Licensing fee for a five-year licence - applicants applying during the first three months of the scheme being introduced. (<i>50% discount</i>)	£250	£50.00	96p
Selective Licensing fee for a five-year licence – applicants applying after the three-month period.	£500	£100	£1.92.
Additional Licensing fee - for a five-year licence - applicants applying during the first three months of the scheme being introduced. (<i>50% discount</i>)	£104	£20.80	£40p
Additional Licensing fee for a five year licence – applicants applying after the three month period.	£208 per unit of accommodation	£41.60	80p

Other fees may apply, again these have been calculated to ensure that the scheme is cost neutral. Additional costs could include: a fee if the landlord wants to make a paper application or if the landlord needs assistance with completing an application form.

Other fees

	Cost
Paper applications	£100
Assistance with completing the application form	£60
Assistance with completing the application form, including the drawing of floor plans (<i>HMOs only</i>)	£390
Change of licence holder – new application fee	£500 Selective licensing / £208

Additional and Selective Licensing – Consultation proposal

	per unit of accommodation for HMOs
Temporary Exemption Notice.	£30.00

Refund Policy – if the Council refuse a licence application, the landlord will not receive a refund.

Duration of the licence – Licences will usually last five years. However, a licence may be issued for a shorter period where poor management and property conditions are identified. Where this applies the full fee will be payable.

Factors that will be taken into account when issuing a licence for a shorter period include:

- landlords who have failed to licence voluntarily
- failing to have planning permission
- Council tax arrears
- providing false information.
- for failing to manage their property effectively

This variation will be applied along with any enforcement action that is required and will result in the property requiring re-licensing when that time period has expired.

The licensing fee pays for the staff to administer and enforce the scheme. It also part funds services and activities such as legal support, communication and management. We also recognise that being a landlord can be difficult. For this reason, we have built the cost of supporting landlords into the scheme. This will include helpful information and two dedicated members of staff to work alongside landlords. The estimated costs and income associated with the scheme for the five-year period are detailed in the tables below:

Estimated cost of running the licensing schemes for five years.

Expenditure Type	Estimate Total for 5 years
Staff Costs (inc Corporate overheads administration, inspection and enforcement)	£7,423,866
IT costs	116,313
Communications	
Legal costs	250,000
Support and Resources	1,020,774
Total	£8,810,953

Additional and Selective Licensing – Consultation proposal

Estimated fee income received

	No. of Licences issued	5 year total
Year 1	8,383	3,841,384
Year 2	3,819	2,861,930
Year 3	881	700,078
Year 4	752	621,258
Year 5	911	786,302
Total	14,745	8,810,953

How will the scheme be delivered?

Our overriding priority for introducing the scheme is to significantly improve property conditions in the private rented sector.

We want to ensure that good landlords can self-certify that their property meets the required standard and receive a light touch approach to checking that they are compliant. Where the council receives information to suggest that the property is not compliant, more robust checks will be carried out. We intend to inspect all HMO properties over the period of the scheme and all other properties if they are flagged as high risk or problematic properties.

The scheme also covers providing advice and assistance to landlords and offering guidance to help them meet their legal responsibilities. Our aim is to work with landlords, to secure improvement and support the sector to thrive.

Consultation

We are carrying out a consultation for a 12- week period, starting on 11th December 2017 and finishing on 5th March 2018. During that time an on- line short questionnaire will be available to complete and a number of drop in sessions will be held throughout the borough. Three public meetings will take place and the feedback received through the questionnaire responses and public sessions will be evaluated by an independent outside agency – M.E.L. Research Ltd. The results of the consultation exercise will be made publicly available.

The council's web site will include all the details about the public consultation, including the dates and locations of drop in sessions and meetings.

Additional and Selective Licensing – Consultation proposal

For anyone wishing to contact the council during the public consultation can do so by emailing: PropertyLicensing@haringey.gov.uk or telephoning 020 8489 6934.

Appendix 3: Survey

Private Rented Properties – Licensing consultation

We want your views on our proposal to introduce two new property licensing schemes to improve the local environment and the housing conditions of renters in the private sector.

The survey will take around 5 minutes to complete.

The consultation opens on 11th December 2017 and closes on 5th March 2018. The results and final recommendations will be reported back to Cabinet in June 2018. If you have any queries please email PropertyLicensing@haringey.gov.uk

What is property licensing?

Local Councils can choose to require private landlords or their agents to obtain a licence to rent out their property. A licence usually lasts for five years and landlords have to keep their property safe and well maintained as well as deal with any problems associated with the property such as dumped rubbish, untidy gardens or anti-social behaviour.

There are three types of licensing schemes:

Mandatory Licensing – Since 2004, all councils have had to run a licensing scheme for large houses in multiple occupation (HMOs). Any HMO that has three or more storeys with five or more people living as two or more households and sharing amenities has to be licensed.

Additional Licensing – Councils can introduce Additional Licensing to cover any other type of HMO in their area.

Selective Licensing – this type of scheme covers all other private rented properties.

Further information about the different types of licensing can be found [here](#).

Landlords have to pay a licensing fee for each property they rent out. The licensing fee covers the cost of the scheme and allows the council to employ staff to check the condition of private rented properties in the area and make sure that the correct management arrangements are in place. The fee can also be used to support landlords by offering them advice and guidance.

Haringey already has two licensing schemes – A Mandatory licensing scheme and an Additional licensing scheme in the Tottenham area.

The Council believes that extending their current licensing scheme to cover all HMOs in the borough as well as introducing a Selective Licensing Scheme for all other privately rented properties in smaller areas across the borough will:

- Improve the living arrangements of many private sector tenants by improving the condition of properties.
- Reduce property related crime, anti-social behaviour and rubbish dumping.
- Support good landlords and remove rogue landlords from operating in the borough.
- Improve the image of an area, making it a desirable place to live.

Additional and Selective Licensing Questionnaire

Q1 Which of the following best describes you? (Please tick all that apply)

- ☐ A resident of Haringey
- ☐ A landlord with a property (or number of properties) in Haringey
- ☐ A landlord living outside of Haringey with a property (or number of properties) in Haringey.
- ☐ An agent, managing properties in Haringey
- ☐ A business operating in Haringey
- ☐ A community group or charity operating in Haringey
- ☐ A resident / landlord / business in a neighbouring borough to Haringey
- ☐ Other (Please specify below)

Q2 Which of the answers best describes your housing tenure? (Please tick one box only)

- ☐ Owned or buying with a mortgage
- ☐ Rented from Housing Association, Trust or the Council
- ☐ Renting from a private landlord
- ☐ Living with family or friends
- ☐ Owner renting out a spare room
- ☐ Homeless
- ☐ Living in temporary accommodation
- ☐ Other (Please specify below)

Q3 Which area of Haringey do you live in? (Please tick one of the following)

This will help us see where responses are coming from in Haringey.

- ☐ N2
☐ N4
☐ N6
☐ N8

- ☐ N10
☐ N11
☐ N13
☐ N15

- ☐ N17
☐ N18
☐ N22

Q4 Which area of Haringey do you operate a business or organisation in? (Please tick all that apply)

This will help us see where responses are coming from in Haringey.

- ☐ N2
☐ N4
☐ N6
☐ N8

- ☐ N10
☐ N11
☐ N13
☐ N15

- ☐ N17
☐ N18
☐ N22

Q5 Which area of Haringey do you have/manage properties in? (Please tick all that apply)

This will help us see where responses are coming from in Haringey.

- ☐ N2
☐ N4
☐ N6
☐ N8

- ☐ N10
☐ N11
☐ N13
☐ N15

- ☐ N17
☐ N18
☐ N22

Q6 Where do you live? (please state which borough)

Scheme proposal

Haringey's proposal for introducing Additional and Selective Licensing includes:

• **Additional Licensing** – a borough wide scheme that will require all HMOs in Haringey to be licensed.

Please click on the link to find further information on the type of HMO included: [Type of HMO included within the proposed Additional Licensing Scheme](#)

• **Selective Licensing** – a scheme that will require all other privately rented properties located in 29 selected areas, to be licensed.

Please click on the link to find further information on the 29 areas: [Proposed Selective Licensing Areas](#)

- **A set of conditions that all landlords have to follow** – the council believes that the conditions will lead to better managed properties, a reduction in anti-social behaviour (specifically untidy front gardens and dumping of rubbish) and an improvement in living conditions for tenants.

Please click on the links below to find further information on the Licensing Conditions.
[Additional Licensing Conditions HMOs](#)
[Selective Licensing Conditions](#)

- **A license fee that all landlords will have to pay** – the fee will cover the cost of running the scheme. The council cannot make a profit from the scheme.

The Schemes

Q7 To what extent would you support the proposal to implement a... (Please tick one box only for each scheme)

	Fully support	Partially support	Do not support	Don't know/not sure
Q7a. To what extent would you support the proposal to implement a Borough wide Additional (HMO) licensing scheme?	☐	☐	☐	☐
Q7b. To what extent would you support the proposal to implement a Selective licensing scheme in the 29 areas?	☐	☐	☐	☐

Q8 Please tell us the reason for your answer about a borough wide Additional licensing scheme in the box below.

Q9 Please tell us the reason for your answer about a Selective licensing scheme in the box below.

Q10 What impact, if any, do you feel implementing a... (Please tick one box only for each scheme)

	A positive impact	No impact	A negative impact	Don't know/not sure
Q10a. What impact, if any, do you feel implementing a Borough wide Additional (HMO) licensing scheme would have on you?	☐	☐	☐	☐
Q10b. What impact, if any, do you feel implementing a Selective licensing scheme would have on you?	☐	☐	☐	☐

Q11 Please tell us the reason for your answer about a borough wide Additional licensing scheme in the box below.

Q12 Please tell us the reason for your answer about a Selective licensing scheme in the box below.

The Licensing Fee

(In setting the licence fee the Council has estimated how much it will cost to run the scheme)

Please click [here](#) for more information on the license fees

Q13 To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? (Please tick one box only for each scheme)

	Totally reasonable	Fairly reasonable	Fairly unreasonable	Totally unreasonable	Don't know/not sure
Q13a. To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? - Additional licensing scheme (HMOs) fees	☐	☐	☐	☐	☐
Q13b. To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? - Additional licensing scheme (HMOs) <u>other</u> fees/charges	☐	☐	☐	☐	☐

Q13c. To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? -
Selective licensing scheme fees

☐☐☐☐☐

Q13d. To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? -
Selective licensing scheme other fees/charges

☐☐☐☐☐

Q14 Please tell us the reason for your answer about fees for a borough wide Additional licensing scheme in the box below.

Q15 Please tell us the reason for your answer about other fees/charges for a borough wide Additional licensing scheme in the box below.

Q16 Please tell us the reason for your answer about fees for a Selective licensing scheme in the box below.

Q17 Please tell us the reason for your answer about other fees/charges for a Selective licensing scheme in the box below.

The Conditions

(a set of licensing standards all landlords must adhere to for both the management and condition of the property)

Q18 Do you feel that the licensing conditions are reasonable and will improve the standard of private rented housing? (Please tick one box only for each scheme)

Yes No Don't know

Q18a. Do you feel that the licensing conditions are reasonable and will improve the standard of private rented housing? - Additional licensing scheme (HMOs) conditions

☐ ☐ ☐

Q18b. Do you feel that the licensing conditions are reasonable and will improve the standard of private rented housing? - Selective licensing scheme conditions

☐ ☐ ☐

Q19 Please tell us the reason for your answer about a borough wide Additional licensing scheme conditions in the box below.

Q20 Please tell us the reason for your answer about a Selective licensing scheme conditions in the box below.

Other suggestions and comments

Q21 Please use the box below to provide any other comments or suggestions on the proposals. (100-word limit)

Public meetings and drop in sessions

Q22 If you are interested in attending one of the public meetings (places will be reserved on a first come first served basis) or consultation drop in sessions at various locations across the borough, please provide your name and email address below:

(This information will be passed onto the council to get in touch with you)

Name:

Email
address:

Q23 Haringey Council will publish the results of the consultation on their website. If you wish to be notified when the results are available, please provide your name and email address below:

(This information will be passed onto the council to get in touch)

Name:

Email
address:

Q24 Alternatively, if you are unable to provide an email address, please provide your postal address below:

(This information will be passed onto the council to get in touch)

Address:

About you

Haringey Council are committed to make Haringey a fair and equal borough. In order to do this, we are collecting equality monitoring data to understand inequalities in the borough. This helps the council to demonstrate how they meet their legal duties under the Equality Act 2010. All data collected is for monitoring purposes only and is held under the Data Protection Act 1998.

Q25 How old are you? (Please tick one box only)

- ☐ Under 20
- ☐ 21-24
- ☐ 25-29
- ☐ 30-44
- ☐ 45-59
- ☐ 60-64
- ☐ 65-74
- ☐ 75-84
- ☐ 85-89
- ☐ 90 and over
- ☐ Prefer not to say

Q26 Are you....? (Please tick one box only)

- ☐ Male
- ☐ Female

Q27 Does your gender differ from your birth sex? (Please tick one box only)

- ☐ Yes
- ☐ No
- ☐ Prefer not to say

Q28 Are you pregnant? (Please tick one box only)

- ☐ Yes
- ☐ No

Q29 Have you had a baby in the last 12 months? (Please tick one box only)

- ☐ Yes
- ☐ No

Q30 What is your marital status? (Please tick one box only)

- ☐ Single
- ☐ Married
- ☐ Co-habiting
- ☐ Separated
- ☐ In a same sex civil partnership
- ☐ Divorced
- ☐ Widowed
- ☐ Prefer not to say

Q31 Are you...?

- ☐ A refugee
- ☐ An asylum seeker
- ☐ Neither of the above

Q32 What country or region are you a refugee/asylum seeker from?

Q33 Which of the following best describes your sexual orientation? (Please tick one box only)

- ☐ Bisexual
- ☐ Gay/Lesbian
- ☐ Heterosexual/Straight
- ☐ Prefer not to say

Q34 What is your ethnic background? (Please tick one box only)

- | | | | |
|--|----|--|----|
| ☐ White: British | 01 | ☐ Asian: Indian | 13 |
| ☐ White: Irish | 02 | ☐ Asian: Pakistani | 14 |
| ☐ White Other: Gypsy/Roma | 03 | ☐ Asian: Bangladeshi | 15 |
| ☐ White Other: Greek/Greek Cypriot | 04 | ☐ Asian: East African Asian | 16 |
| ☐ White Other: Turkish | 05 | ☐ Asian Other (please specify) | 17 |
| ☐ White Other: Kurdish | 06 | ☐ Black: African | 18 |
| ☐ White Other: Irish Traveller | 07 | ☐ Black: Caribbean | 19 |
| ☐ White Other: (please specify) | 08 | ☐ Black Other (please specify) | 20 |
| ☐ Mixed: White and Black Caribbean | 09 | ☐ Chinese or other ethnic group: Chinese | 21 |
| ☐ Mixed: White and Black African | 10 | ☐ Any other ethnic background (please specify) | 22 |
| ☐ Mixed: White and Asian | 11 | ☐ Prefer not to say | 23 |
| ☐ Mixed Other (please specify) | 12 | | |

please write in below

Q35 Please tick the box that best describes your first language. (Please tick one box only)

- ☐ Albanian
- ☐ Arabic
- ☐ English
- ☐ French
- ☐ Lingala
- ☐ Somali
- ☐ Turkish
- ☐ Other (please specify)

Disability

Under the Equality Act 2010, a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day-to-day activities. Haringey Council accepts the social model of disability. However, in order to be able to identify and respond to your specific needs, it is important to know what kind of disability you have.

Q36 Do you consider yourself to be a disabled person? (Please tick one box only)

- ☐ Yes
- ☐ No

Q37 **[If yes] Is your disability related to any of the following...?** (Please tick all that apply)

- ☐ Blindness or partial loss of sight
- ☐ Deafness or partial loss of hearing
- ☐ Developmental disorder
- ☐ Learning disability
- ☐ Long term illness or condition
- ☐ Mental ill health
- ☐ Physical disability
- ☐ Other disability (please write in below if you wish)

Thank you for taking the time to complete this questionnaire.

Appendix 4: Email and written responses to consultation

Appendix 4: Written responses to the consultation

Please note that names and references to an individual person or property have been removed. Where Organisational responses have been received, these names have been included.

Response 1

Madam/Sir,

I write to strongly object to the proposal by Haringey Borough Council (HBC) to impose selective licensing to private rented properties located in 29 LSO areas within the Borough. I particularly object to inclusion of the LSO containing the even side of Milton Park which is patently absurd and unfair. The basis for my objection is set out in full below and I ask that these significant concerns are considered as part of the formal consultation.

I agree that it is important to maintain a well-managed private rental sector that seeks to maintain the same high standards throughout the sector and in all locations and reduce problems caused by anti-social behaviour, fly tipping and property related crime; and increase good landlords and eliminate rogue landlords.

There is no evidence to indicate that these problems are more characteristic of the areas identified for inclusion in the selective licensing scheme than anywhere else. More specifically, the evidence provided as part of this consultation lacks clarity in terms of its methodology and cannot be considered sufficiently specific to dictate the inclusion or exclusion of one street over another, let alone individual properties on any given street.

This is the case in relation to Milton Park in Highgate Ward. The evidence provided for Highgate Ward suggests this is an area with a mean index score well below the Borough average (63 compared to 100) and which sits joint fourth with Crouch End Ward in terms of the best performing Wards when measured against all of the selected criteria. Despite this, a section of the Ward has still been included in for proposed selective licensing, including even numbered properties along one side of Milton Park. Aside from my concerns regarding the flawed approach of such a scheme as noted above, there can be no justification for selecting even numbered properties and omitting odd numbered properties on the street. This is absurd, unfair, and discriminatory in explicitly labelling specific properties as having a higher potential to attract anti-social and criminal activity. Rather than direct extensive time and finance towards seeking to implement this fundamentally flawed selective licensing scheme, HBC should be seeking to effectively and comprehensively implement the measures already within their remit through planning, building control, and environmental protection to all properties within the Borough.

Selective licensing in this manner is both unjustified and discriminatory and it distracts from the overarching objective of improving the condition of properties throughout all housing sectors across the Borough.

Response 2

Subject: Selective Licensing and borough-wide Additional Licensing

Dear xxx,

I am registering my objections in respect of the above.

Response 3

Subject: Milton Park (Licensing Consultation Objection)

Dear xxx,

Further to xxx's email on behalf of the Milton Park Neighbourhood Watch Group, we would also like to submit our objection to Milton Park's inclusion in the selective-licensing scheme on a personal basis.

Our reasons are the same as laid out in the email below. We believe that the data is flawed and that Milton Park has been included in error. Whilst the underlying data has not been shared with residents, we believe that scrubbing it for the type of anomalies described would see Milton Park being removed from the proposal.

We are home owners rather than landlords on Milton Park, and we broadly agree with landlord licensing, however, incorrectly including Milton Park in the Haringey scheme means that Haringey won't be directing resource and rolling-out licensing / protection to an area / tenants that really need it.

Kind regards,

Subject: Re: Milton Park (Licensing Consultation Objection)

Dear xxx,

Thank you for the response; however, it does not provide the detail needed to scrutinise and properly analyse how the even-numbered properties of Milton Park have ended up in your proposal. For the purpose of the consultation period, please note that, as the local Neighbourhood Watch Coordinator, I object to Milton Park being included in Haringey's selective-licensing programme.

Milton Park is a small community where a lot of the neighbours know each other and where we have some very long-standing residents who have been here for decades. The conclusions in your report are simply not ones we recognise here on the ground, especially the comments on crime / ASB. In addition to this feedback from the residents, this is the feedback from our Met. Police Safer Neighbourhood Team:

"...from our point of view (Highgate SNT) Milton Park is not an area where we get notified about many anti-social behaviour type problems... Normally with ASB, we would be notified from either the person suffering from it, and or another authority such as council or housing association etc so we don't often miss these incidents."

Somewhere the data on Milton Park is flawed. Without seeing the underlying data, I would hazard a guess that two things are skewing it:

- 1) the even-numbered properties back onto the Parkland Walk, which has incidences of fly-tipping and crime that should be excluded from any property analysis (and certainly not assigned to a property within 25m).
- 2) In addition, the even-numbered side of the road houses St Mungos, which is a specialist charity that aims to help people with enduring mental health problems who want to live independently in the community (but, as a result, has had some incidences of ASB). Again, this is an anomaly that should be excluded from your data.

As per my initial email, I am broadly supportive of licensing in order to protect tenants; however, by incorrectly including Milton Park, you are missing out on including addresses that are genuinely in need of this sort of licensing.

At a minimum, the data needs to be scrubbed for any anomalies such as those I have mentioned above. In addition, I am happy to arrange a tour for you and our local Safer Neighbourhood Team so you can see what an incredibly standard residential street Milton Park is, and why it should not be included in Haringey's licensing scheme.

Kind regards,

xxxx

Response 4

Subject: Objection to Milton Park, Highgate, N6 proposals

Dear xxx,

I am emailing in response to the consultation on property licensing in Milton Park, N6

I wish to record strong objections to the proposed selective licensing area centred on the even-numbered side of Milton Park N6 for the following reasons:

1. To impose restrictions and charges on the owners of rented property on the even-numbered side of Milton Park only and not on the uneven numbered side is discriminatory and illogical; why not both sides of the street?

2. To impose restrictions and charges on the owners of rented property in Milton Park only and no other road in the Milton's' (Milton Road, Milton Avenue and Langdon Park Road) of which it forms a part, is again discriminatory, illogical and quite probably improper
3. I understand from contact that I have had with fellow residents of Milton Park that Haringey Council claims that the purpose of the licensing area is to deal with problems of substandard property, antisocial behaviour or crime.

What evidence does the council have to support these claims?

There is no evidence that the even side of Milton Park is more prone to such problems than the uneven numbered side, the rest of the Milton's or the majority of the rest of Haringey which is not being proposed for licensing. And to imply that landlords and tenants on the even side of Milton Park are a source of crime and antisocial behaviour, or that their property is more likely to be substandard than elsewhere, is quite probably discriminatory and defamatory.

- Do you have statistics from the Metropolitan Police in Haringey Borough to support your assertion that more crime is committed in the odd numbered properties in Milton Park? And If there is extra crime in the area, how much of it is committed by people living in council owned properties, of which there are a few in the Milton's?
Having lived on the even side of Milton Park for 30 years now I would contend that the police are called more often to incidents in Milton Road & Milton Avenue than they are in Milton Park, and that most of the incidents in Milton Park relate to the hostel that Haringey Council runs in conjunction with St. Mungo's at 88 Milton Park. However, you appear to be forgetting the problems there are associated with that building
 - Have Haringey Council inspected every even numbered building on Milton Park, because to my knowledge the council have not inspected the building I live in at 80 Milton Park nor have we received a request for them to do so?
If Haringey Council have inspected even numbered buildings, will they supply the residents of those buildings with copies of their findings that will back up their assertion that they are in a sub-standard condition?
If you speak to local estate agents they will tell you that contrary to the councils' assertion, the properties on the even numbered side of Milton Park and which back onto Parkland Walk are generally in better condition than in Milton Road and Milton Avenue. In fact, Milton Park is regarded as the best road out of the three Milton roads to own a property in and this is reflected in property prices.
4. I have no received no correspondence from nor a visit from Haringey Council officials to discuss their proposals which is surely in breach of the councils' charter to explain and fully consult with residents before making any changes
 5. I understand from xxx that that Haringey Council have not responded to requests from Milton Park residents for the methodology and data underpinning their targeting of the even side of Milton Park in December 2017. This is surely in breach of the council's consultation charter which requires you to give residents a proper say in the decision - making process and provide enough information to help them make an informed decision on the neighbourhood in which they live. It is certainly contrary to the requirement for open, accountable local government and in my view this probably amounts to a charge of maladministration.
 6. As I understand it Haringey Council is legally obliged to carry out its work in a way that is fair, logical and supported by independently verifiable evidence. Unfortunately, because of the lack of transparency regarding this process and the significant gaps in the methodology you have followed it cannot be argued that you have done so.

To conclude I am requesting that Haringey Council takes into account the concerns of Milton Park, N6 residents before making a final decision on this scheme and specifically, takes account of my own personal objections.

Response 5

Subject: Objection to Selective licensing in Milton Park

Dear xxx

I am writing in response to the consultation on property licensing in Haringey, with particular reference to Milton Park.

I strongly object to the proposed selective licensing area centred on the even-numbered side of Milton Park N6 as from what I've read there's no clear reasoning or factual data behind the move.

I've lived in the area for four years and have never encountered any anti-social behaviour in the street, let alone only on the even-numbered side of the road! To suggest one side of Milton Park is guilty of being home to rogue landlords and anti-social behaviour is laughable.

The maps provided on the council website as part of this consultation point to be fact that the Miltons in general sees very little crime, ATB or any other factors you were evaluating compared to other areas of Haringey so to be lumped in with them beggars belief.

Please, may you reconsider your proposed designation of Milton Park within this selective licensing programme.

Response 6

Subject: Property licensing: response to consultation Milton Park

Dear xxx and Property Licensing consultation

I am writing in response to the consultation on property licensing.

I wish to record my strong objection to the proposed selective licensing area centred on the even-numbered side of Milton Park N6 for the following reasons:

1. To impose special obligations, restrictions and charges on the owners of rented property on the even-numbered side of Milton Park only and no other road in the Miltons area (Milton Road, Milton Avenue and Langdon Park Road) of which it forms part is unfair, unreasonable and unwarranted.
2. The council claims that the purpose of the licensing area is to deal with problems of substandard property, antisocial behaviour or crime. There is no evidence that the even side

of Milton Park is more prone to such problems than the other side, the rest of the Miltons or 80% of the rest of Haringey (which is not proposed for licensing). I have lived on the even side of Milton Park for 9 years and I have never experienced any such problems. Is crime from the Parkland Walk being included on our road as the basis for this?

3. The two sides of Milton Park are self-evidently in the same area as each other so the singling out of one side, but not the other, to be in a licensing area is illogical and improper.

4. To imply that landlords and tenants on the even side of Milton Park are a particular source of crime and antisocial behaviour, or that their property is more likely to be substandard than elsewhere, is discriminatory and defamatory.

5. Any designation of a selective licensing scheme must be carried out in a way that is fair, logical and supported by independently verifiable evidence. For the current consultation to be meaningful it would have been essential for the Council to be fully clear and transparent about the way it came to its conclusions, from the beginning, and provide the means by which its conclusions could be verified by affected parties. My neighbours have requested this information but it has not been provided. .

Response 7

Subject: Property licensing: response to consultation

Dear xxx

I write regarding the consultation on property licensing.

I strongly object to the proposed selective licensing area centred on the even-numbered side of Milton Park N6. This is unfounded and arbitrary, with no obvious justification. I hope the Council will reconsider.

Response 8

Subject: SELECTIVE LANDLORD LICENSING PROGRAMME...

NO...NO...NO...

...it is unreasonable to impose charges on even-numbered properties in Milton Park.

...there is no evidence of anti social behaviour or crime associated with these properties ...I have been resident in Milton Park since 1976 and am mystified as to how this programme has been promulgated.

Response 9

Subject: Selective Licensing - Milton Park

Dear Sir or Madam,

I have recently discovered that Haringey Council is going to introduce a Selective Licensing Scheme in my area. I am a flat owner in Milton Park N6 and I live in the property. Based on your criteria the licensing scheme is to be introduced in areas "scoring the highest for poor housing conditions, ASB and crime." Deeming an area as "scoring the highest for poor housing conditions, ASB and crime" will affect property prices in the neighbourhood. I am not aware that Milton Park meets such criteria.

I would like to see evidence that Milton Park where I live is an area of "poor housing conditions, ABS and crime" with stats higher than average for "a significant and persistent problem with private rented property related ASB."

If your decision is based on flawed evidence and will affect the property prices I will seek compensation for financial losses caused by introducing the scheme.

Response 10

Subject: Selective Licensing Consultation

Dear xxx

Re: Selective Property Licensing

I am an owner of a rented property in Milton Park and therefore will be affected by the proposed Selective Licensing.

I strongly object to the new scheme that is being posed on the owners of rented properties on the even side of Milton Park. The predicted model used is utterly baseless and amounts to discrimination to one side of residents over the other. Additionally none of the other roads such as Milton Road and Milton Avenue in the Miltons have been included in this scheme.

I attended the first consultation in Jackson Lane in January 2018 and questioned the basis on which the decision was made to include the even side of Milton Park in the scheme. The response from both the Council Officers and the Consulting firm was very generic and answers were neither specific nor informative.

By single outing the even numbered properties in Milton Park, the Council is implying that these properties are sub-standard and prone to crime and anti-social behaviour. This is totalling discriminative, defamatory and un-substantiated and also discriminates renters over owner occupiers.

Furthermore the Council's proposed Selective Licence requirements would incur additional burden to the landlords in the form of time, effort and monetary costs, these costs would ultimately be passed on to the tenants which is exactly what the Council is trying to minimise.

To have our property under such a scheme will render our property less attractive than some of the other properties around the same area to both future potential buyers and renters.

We as landlords are already complying with tenants referencing (to protect our most valuable asset), EPC, Gas Safety, Tenancy Deposit, Right-to-Rent, How-to-Rent along with the current additional requirement to have Minimum Energy Efficiency Standard (MEES).

We are well aware of our role as landlords within the Private Rented Sector (PRS), we do not need the Council to tell us how to run our business by imposing new requirements that deviates from already established practice in PRS such as requiring one week's notice to enter property, character referencing etc.

I request a prompt reply detailing the rationale behind the selection process to include the Milton Park, with full transparent and justifiable reasoning.

Response 11

Subject: Selective Licensing proposal: Even numbered side of Milton Park

Dear xxx,

I am writing as the owner of a first floor flat in xx Milton Park. I rent out my flat to a single tenant, a very pleasant middle aged woman who has been living there under yearly assured shorthold tenancy agreements for around 5 or more years. Before that my flat was rented to the same tenant for around 9 years. Prior to renting out the flat I lived there with my family before I moved abroad for work reasons. Ever since I have owned it, the other flats in the building have either been rented out to stable and respectable, professional tenants or occupied by the owners and family members.

I am worried about the proposal to designate the even numbered buildings in Milton Park as a Selective Licensing Area. In the approximately 16 years since I have owned my flat I have not encountered antisocial behaviour, crime or flytipping etc more that one would find in any other nice part of north London. In fact over the last few years when I have visited the property I have noticed that the cleanliness of the area and external condition and decoration of the buildings has considerably improved, and property owners are investing in improving their properties. This is the case with all parts of the "Miltons" roads, including the even numbered side of Milton Park.

I therefore fail to understand why this side of the road has been singled out in this way. There appears to be no justification for it in Haringey's consultation documents.

I am very concerned that if one side of the road is designated in this way it will lead to a lowering of the value of those properties. As a result there would be a decrease in the amount that building owners will be willing to spend on improving those properties. It could lead to a very unfortunate slow-down or reversal of the improvement of the area which we have welcomed in the last few years. Indeed, as an owner of the building's freehold we have been discussing improvements to no.xx Milton Park. The thought that the building has in effect been condemned in this way would seriously effect our actions.

Our concern is heightened by the unfairness in designating only one side of the road in this way without any proper explanation or justification.

Please take my comments into account as part of the consultation process.

Response 12

Subject: London Borough of Haringey – Property Licensing Consultation – Public Meetings

Thank you for your reply. I accept your apology, but I know that from the responses I received I was not the only disgruntled recipient.

Just to spell the situation out once again. A paper copy of the questionnaire is no good, I am NOT currently in the UK and I have filled out the on-line questionnaire. What I hope to do is to email a letter to someone, somewhere where my opinion will be heard 'Loud and Clear'.

I am very much anti this licence scheme for small private landlords that are renting, most via reputable agents, and offering high quality accommodation for 3 sharers, who undertake a Assured Shorthold Tenancy as a small profession group.

I feel that Haringey's proposal is an extremely bad idea and invention to generate more money for the borough. I assure you that this will jump up and bite you as many small professional, but caring and law abiding landlords will withdraw their properties from the rental market, making an even greater shortage of good stock for the professional tenants in our Capital.

Please in the meantime would you ensure that this email is passed on to the relevant counsellors or staff members who have drummed up this absurd proposal.

Response 13

Subject: Additional and Selective Property Licensing ("Licensing") Consultation

We refer to your undated letter delivered by hand and received from the tenants this week.

Given the Council has our details from the Council Tax Register and the same are easily available from the Land Registry, please explain why your letter was not delivered directly to us as Landlord if it is landlord's opinions that you wish to elicit. Such delivery would have allowed easier communication with us. If it is only non-landlord's views you want, then please explain what sort of balanced consultation you are trying to hold. As a result of what looks like selecting the recipients before looking at the picture, we are left with the feeling that your letter is merely to go through the motions of a consultation, rather than to seek landlord's opinion properly, widely and openly. We trust this is not the case and would be obliged to receive your assurances in respect thereof.

Turning to the subject matter of the letter, we would strongly like to urge Haringey councilors and directors of policy to consider the unintended consequences and the harm that such Licensing implementations could do to areas like Crouch End and to drop this ill-proposed action.

Contrary to what we are sure to be your expectations, by introducing Licensing, we respectfully suggest that you will not change the face of Haringey or any part of it for the following reasons:

1. existing HMOs will still remain in the condition they are currently if they are owned by persons who have scant regard for the law anyway. Such persons are beyond reach by your registration and Licensing proposals. They are able to undercut landlords like us who are members of national bodies and who are accredited. (NB we are accredited because we want to be members and accredited, voluntarily, not forced to be)
2. Making Landlords join schemes mandatorily just breeds discontent and antagonism toward the Council
3. Landlords who are already giving a good service to their tenants and who will register to be licensed because they are forced to register, by contrast to those landlords described in para.1, will find that their costs of running their property will increase. This is not only due to the application fees which you will impose, but also in relation altering their property to comply with arbitrary and questionable “standards” as well as to ongoing increases in running costs. These costs will inevitably be passed on to the tenants by ways of increased rent.
4. Occupiers of tenanted properties are generally happy with their accommodation and do not wish to suffer disruption for the installation of pointless measures eg (having spoken to tenants directly elsewhere) window restraints that restrict window opening, fan extractors when opening windows will do, and so on. Such tenants certainly do not wish to pay for the introduction of these measures that they do not want either.
5. Landlords are already responsible for keeping their property safe and to have insurance thereon to cover such matters; why duplicate this?
6. If landlords are to be registered why stop there? Why not have all the plumbers, decorators and handymen that the landlords use in maintaining their property registered also? Following your argument’s logic, this will raise standards throughout (as well as prices) so that the tenants will benefit. This is plainly nonsense.
7. Merely legislating against things or requiring registration is not going to stop things happening. There are many rules on the statute book already covering the aspects you mention: why is the Council not enforcing those rather than introducing new measures?
8. Landlords are not a legitimate means to impose social order on others: if tenants are making a nuisance of themselves, the Police or the Council Noise Patrol is the proper arm to exercise control. Given that a Landlord cannot enter into a property without his tenants’ consent but they can sublet it (even contrary to the provisions of a tenancy agreement) to others, or via AirBnB, who may be noisy and untidy, how can a Landlord effectively control what happens inside or outside his property and why should he be responsible for tenants who are exercising their free-will. By the measures you seek to impose, you are making landlords responsible for the activities in the property over which they have no control and have no tools to implement apart from costly, lengthy and uncertain in outcome court action. Such action is surely for the Police to pursue and the Council to enforce directly against those who are carrying on the nuisance.

9. You may prevent more HMOs from emerging but existing ones will still remain as frozen communities - no closer to reverting to family areas (if that is the ultimate aim) than they are now.

We propose instead that the future lays with other solutions such as the Council and colleges educating tenants to consider what impact their actions have upon others, how to live sensibly, cleanly and sanitarily in accommodation, the Council fining the noise-maker or rubbish-dumper directly.

We say this because, underlying all this, it is Haringey Council's own responsibility to provide a sanitary, safe and non-threatening environment. Further, instead of assisting by making available (directly or indirectly) satisfactory rented housing for local people (whose income level or chosen lifestyle rely on a plentiful supply of affordable, and often shared, housing), the Council is effectively pricing those very people out of accommodation. This is for what looks very much like ideological reasons.

If it becomes too expensive for three sharers in a property, either a sub-tenant will be taken in by them surreptitiously or the displaced person (ie the flat reduces to a two-person) will now be looking for accommodation elsewhere and the pressure on accommodation will grow not decrease. In either scenario you will have achieved exactly the opposite of what you intended to do by this ill-thought-out scheme.

This continues into the longer term, particularly in the student community – many of whom chose to stay on in Haringey after graduation, to begin their career with local business, and still then need a low-cost housing option until they have cleared the heavy debt of their education, and for low income earners, too, for whom renting is the only choice.

If councillors and policy chiefs feel they have a problem with tenant behaviour or the management of properties in certain areas there are other ways of dealing with this than by changing introducing registers or new planning laws. Organisations like the *National Landlords Association* or the *Residential Landlords Association*, of which we are a member, recognise an inherent danger in such licensing or creating 'no-go HMO zones' where the abhorrent spectre of social engineering would seek to deny sections of society the freedom to live where they choose.

The result is that we can only see losers the Licensing proposals are adopted. Please don't make it impossible, or even more difficult than it is, for private sector landlords to provide affordable homes, this is especially the case in these difficult economic times when most people need all the help they can get.

Yours sincerely

Glencourt Properties

Response 14

Subject: For inclusion in private rented properties licensing consultation

I write to strongly object to the proposal by Haringey Council to introduce selective licensing for privately rented properties.

Kindly acknowledge this email and confirm that it will be included in the comments objecting to the proposal.

The reason for my objection is that the well meant intentions that you are seeking can be achieved through existing powers made available to the council.

It is simply unfair and discriminatory to identify 29 areas within the borough which you consider to be more at risk without providing detailed evidence to support your assertions.

I rent out two flats on the even numbered side of Milton Park and it is simply absurd and indeed insulting to suggest that my tenants are somehow responsible for more antisocial behaviour and criminality than those who live in even numbered houses on the street.

I understand from other individuals who live in Milton Park that their repeated requests for you to provide the detailed analysis and assumptions on which you have selected part of Milton Park for inclusion in the selective licensing scheme have not been forthcoming and this only leads to greater suspicion as to the motives behind your intentions. Therefore, in the interests of transparency, please publish this information as a matter of urgency.

As you will be aware, Milton Park is one of the most prosperous areas within our borough and yet it seems to have been targeted by yourselves when other less prosperous areas such as Wood Green and Tottenham have been left out of your proposals.

This only reinforces the view that the council is misguided in its approach to matters.

In conclusion, Haringey Council has sufficient powers available to it within existing legislation to tackle the issues that it perceives to be in existence across the borough and with this in mind any form of licensing of private landlords, whether selective or otherwise, is unnecessary and prejudicial.

Response 15

Re: Consultation on Selective Property Licensing

I have recently returned to London from business abroad and have noted the leaflets you have circulated regarding the above.

In this instance it reeks of yet more stealth taxes by our borough much the same as parking control zones where, for example, in my own locale the restrictions between 10 am – 12 am are worthless and only, for a short while each day, give us any opportunity of parking anywhere near our homes.

In this instance, I have knowledge of letting institutions operating in Haringey whose very modus operandi is far from an example of the need for such licensing but, in fact, very much the reverse and where their standard of care for tenants and general administration can only be applauded as an example to all; this being where young relatives have come to London wishing to live somewhere near to us and have taken up tenancies locally and where the rapport, ethics and management of the Landlords has been second to none – even to the point, in fact, where the Landlords issue statements quarterly showing the tenancy security deposits accruing interest. The firm also have accreditation with the NLA.

On speaking with them, off the cuff so to speak, they mentioned that a similar licensing scheme in Newham eventually meant Landlords passing on the licensing and extra admin costs down the line to the tenants and this is certainly not what is required of our borough council.

Diligence in this arena of housing is clearly needed to root out those operators who create this atmosphere where concern is heralded about poor liaison with tenants, lack of attention to standards, and health & safety but NOT in an all encompassing scheme which will foist licensing payments on operations with good standards of care and management who will understandably pass down the chain to local tenants those same costs.

Repeated layers of regulation have already given excellent protection for tenants and any licensing scheme must not penalize those operators who are welcomed in our area to set standards but should be geared towards regulating those who cannot operate in providing good standard accommodation at a fair price in these days where becoming a home-owner is so difficult for the young professional generation.

Appendix 5: National Landlords Association response

National Landlords Association

Response to Haringey Borough Council's proposal for selective licensing

March 2018

Introduction

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents more than 72,000 individual landlords from around the United Kingdom. We provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. We seek a fair legislative and regulatory environment for the private rented sector, while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. We thank Haringey Borough Council for providing us with the opportunity to comment on the selective licensing proposal.

Executive summary

5. Having considered the evidence presented, and having undertaken our own evaluation of the circumstances faced by the residents of Haringey, our position can be summarised by the following brief points:
 - Landlords have very limited authority when dealing with matters related to antisocial behaviour, especially if it happens outside the curtilage of the property.
 - The council has failed to provide evidence of a direct link between recorded housing crime and the private rented sector.
 - The scheme will lead to a further displacement of problem tenants in Haringey.
 - Selective licensing will have the effect of stigmatising the designated area.

- The documentation provided fails to indicate that sufficient funding will be available to support the introduction of licensing. Can the council guarantee that every house will be inspected as outlined in law?
- The council has failed to say how it will prevent malicious claims of antisocial behaviour being made, which could result in tenants losing their tenancies. Can this be provided?
- The document says that Haringey Borough Council will use all its legal powers. However, if it were to use the powers it already has, this would solve the issues and it would not then require selective licensing. In 2016, it prosecuted only 7 landlords and served only 33 improvement notices.
- The council has not published its strategy for dealing with chaotic and antisocial tenants. This should run in conjunction with the current proposal.
- The council has failed to say how the proposal will tackle rent-to-rent and subletting, or even Airbnb.

6. We contend that the flaws in the process and proposals, as outlined above, must be rectified before this application is progressed. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be repeated (if permissible) to ensure engagement with all relevant stakeholders.

General feedback on proposals

7. Licensing is a powerful tool. If used correctly by Haringey Borough Council, it could resolve a number of specific issues. We have supported many local authorities in the introduction of licensing schemes that benefit landlords, tenants and the community. However, in this case, the council's lack of evidence does not support its arguments for the introduction of licensing.
8. We believe that any regulation of the private rented sector must be balanced. Additional regulatory burdens should focus on increasing the professionalism of landlords, improving the quality of the private rented stock and driving out the criminals who act as landlords and blight the sector. These should be the shared objectives of all the parties involved, in order to facilitate the best possible outcomes for landlords and tenants alike. Good practice should be recognised and encouraged, in addition to the required focus on enforcement activity. This is not the case here.
9. In addition, the proposal does not take into account rent-to-rent or those who exploit people (both tenants and landlords). Criminals will always play the system. For instance, there is no provision for landlords who have legally rented out a property that has later been illegally sublet. The council is not allocating resources to tackle the problems that criminals may cause. Often, landlords are victims, just as much as tenants. What support will the council provide for landlords to whom this has happened?
10. Newham reorganised the council services needed to deliver their licensing scheme. Here, a joined-up coordinated approach within the council will also be required. Additional costs in relation to adult social care along with children's services and housing will undoubtedly be incurred if the council's goal is to be achieved. Yet there is no evidence from the council that this reorganisation will be done – can this be provided?
11. The issue of overcrowding is difficult for a landlord to manage if it is the tenant that has overfilled the property. A landlord can tell a tenant how many people are permitted to live in the property, and that the tenant is not to sublet it or allow additional people to live there. But beyond that, how is the landlord to manage this matter without interfering with the tenant's welfare? Equally, how will the council assist landlords when this problem arises? It is impractical for landlords to monitor the everyday activities or sleeping arrangements of tenants. Where overcrowding does take place, the people involved know what

they are doing and usually are criminals, not true landlords. The council already has the powers necessary to deal with this problem. This also raises concerns for the NLA as this is not currently being undertaken by the council.

12. The proposal fails to address the link between homelessness and the effect that licensing will have on tenants in Haringey. This impact on tenancies due to a selective licensing scheme is absent from the document.
13. Landlords are usually not experienced in the management of antisocial behaviour and do not have the professional capacity to resolve tenants' mental health issues or drug and alcohol dependency. If there are allegations about a tenant causing problems (e.g. antisocial behaviour) and a landlord then ends the tenancy, the landlord will have dispatched their obligations under the selective licensing scheme, even if the tenant has any of the above issues. This just moves the problems around Haringey if the tenant seeks rehousing elsewhere in the area, but does not actually help the tenant, who could even become lost in the system. There is no obligation within selective licensing for the landlord to resolve an allegation of antisocial behaviour. Rather, a landlord has a tenancy agreement with a tenant and this is the only thing that the landlord can legally enforce.
14. Haringey Borough Council has many existing powers. Section 57(4) of the Housing Act 2004 implies that a local authority must not make a designation 'unless (a) they have considered whether there are any other courses of action available to them [...] that might provide an effective method [for Haringey Borough Council to deal] with the problem or problems in question'. The council already has powers that can be used to rectify the problems and, hence, the ability to tackle many of the issues that it wishes to overcome in all parts of Haringey. These include:
 - criminal behaviour orders
 - crime prevention injunctions
 - interim management orders
 - empty dwelling management orders
 - improvement notices (for homes that do not meet the Decent Homes Standard)
 - litter abatement notices (section 92 of the Environmental Protection Act 1990)
 - fixed penalty notices or confiscation of equipment (sections 8 and 10 of the Noise Act 1996)
 - directions regarding the disposal of waste (e.g. section 46 of the Environmental Protection Act 1990)
 - notices to remove rubbish from land (sections 2–4 of the Prevention of Damage by Pests Act 1949).
15. In the last year, the council has prosecuted only 7 landlords and served only 33 improvement notices. Therefore, it either does not have the problems it claims to have – as it is not resolving many issues! – or it is failing to use its existing powers. It would be better if the council were to use the powers that already exist to solve issues that it claims exist before undertaking new licensing.
16. At the commencement of a tenancy, the landlord outlines the tenant's obligations in relation to noise (and other matters, such as waste disposal, compliance with relevant laws and having consideration for neighbours). Throughout the period of a tenancy, the landlord can manage a tenant only to the extent of their mutually agreed contract for living in the rented property – not a tenant's activities in the street outside the property or in neighbouring streets. In the case of a noise complaint, the council would have to inform the landlord that the tenant was being excessively noisy. The landlord then has the right either to warn the tenant or to end the tenancy. If the allegation is false or disingenuous, how is the landlord to know? If the same allegation is made on more than one occasion, the landlord may end the tenancy based

on an unproven allegation or because the council says that there is a problem. This does not solve the problem but rather moves it around the borough if the tenant seeks rehousing elsewhere in the area. The same applies to household refuse and antisocial behaviour issues. The tenant could be labelled as guilty without having faced a trial. Under the reference condition of selective licensing, a guilty judgement can be made without an accusation being tested by a court.

17. The ending of a tenancy will be a way for a landlord to resolve an allegation of antisocial behaviour, even if it is malicious. This will not resolve the issue of high tenancy turnover; it will actually exacerbate it.
18. The introduction of licensing is likely to increase costs for tenants without solving the problems that the council is trying to target. It will likely move the issues around the borough and displace them to new landlords if tenants move to other properties in the area. The issues would be better resolved by a more erudite approach to deal with nuisance and a separate policy to tackle criminals acting as landlords.
19. Often when tenants are nearing the end of their contract/tenancy and are in the process of moving out, they will dispose of excess household waste by a variety of methods. This includes putting waste out on the street for the council to collect. This is made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with a large number of private rented sector properties need to consider a strategy for the collection of excess waste at the end of tenancies. We would be willing to work with the council to help develop such a strategy. One example is the Leeds Rental Standard, which works with landlords and landlord associations to resolve issues.
20. One of the arguments the council has put forward is that selective licensing is being introduced due to the size of the PRS. Can the council clarify: a) is it the council's policy to reduce the PRS in these areas; and b) where does the council wish to see PRS grow in the borough?

Negative impacts of discretionary licensing

21. One of the dangers of the proposed selective licensing scheme is that the costs will be passed on to tenants. This would increase costs both for those who rent in Haringey and for the council. The increased costs to Haringey residents would particularly hit those most vulnerable and least able to tolerate even a marginal increase in their cost of living. Also, the council has failed to explain that, as well as the council's costs for the licence, landlords will likely cover their increased costs by raising rent prices. The failure to explain this shows a lack of understanding of how the private rented sector works. The lack of housing to rent in Haringey is already seeing the council offer £4,000 plus to landlords outside of Haringey to take tenants. This policy will only increase costs to the council, and tenants.
22. Areas that have been subject to the introduction of selective licensing have seen lenders withdraw mortgage products, thereby reducing the options available to landlords who are reliant on finance. Downstream, this increases overheads for landlords and tenants. The lenders that withdraw mortgage availability from a landlord will appear on that landlord's credit history. Other mortgage lenders will then likely put a higher cost on the landlord, which will undoubtedly ultimately reach the tenant.
23. Defining areas of Haringey Borough as problem zones in the consultation will not encourage lending or investment in those areas. This stigmatisation will be reflected in property values within these zones. Haringey Borough Council, by proposing to introduce licensing, is implying that there are social problems, which could deter investment in those areas. The council does not acknowledge the impact that the stigmatisation of discretionary licensing will likely have. It will, for instance, likely increase all car and house insurance premiums, but the council has not told Haringey residents about this. We assert that failure to provide such information indicates a substandard and, ultimately, superficial consultation exercise.

24. One of the council's reasons appears to be a contradiction: it wishes to increase the rents that landlords will receive in the area, while at the same time it expects them to sell their properties. One of the council's aims in the consultation document is to reduce the number of privately rented properties. Why would landlords sell their properties when the council is trying to make them more profitable for landlords?
25. The social housing sector has made many efforts to remove problem tenants (see table below). How does the council expect landlords to solve these tenants' issues when the social sector has failed? Many of the tenants who have been removed from the social sector are now living in the private rented sector without any support. This selective licensing policy will have a greater impact on those people who are evicted from social housing, as they will not be able to access the PRS as they will fail the reference check (mandatory condition).

Mortgage and landlord possession statistics 2016 ¹			
Year (calendar)	Landlord type		Claims issued
	Private*	Social	
2016	54,583 (39.7%)	82,789 (60.3%)	137,372 (100%)
*includes all accelerated claims			

Current law

26. A landlord currently has to comply with over 100 pieces of legislation, and for many, the laws with which the private rented sector must comply can be easily misunderstood. A landlord is expected to give the tenant a 'quiet enjoyment' of the property. Failure to do so could result in a harassment case being brought against the landlord. The law within which landlords must operate is not always fully compatible with the aims of the council. For example, a landlord keeping a record of a tenant could be interpreted as harassment.
27. Licensing is introduced to tackle specific issues. Many of these are related to tenants, and have been identified by the council. The challenge for local authorities is to work with all the people involved and not simply to blame one group – e.g. landlords. We are willing to work in partnership with the council to develop tenant information packs, assured shorthold tenancies and the accreditation of landlords, along with targeting the worst properties in a given area.
28. We would also argue that a problem that is restricted to only a few poorly managed and/or poorly maintained properties would not be appropriately tackled by a licensing scheme applied to all – it is not proportionate. In many situations, the council should consider enforcement notices and management orders. The use of such orders would deliver immediate results. So why, instead, does the council wish to address it over a period of five years and through a licensing scheme? A targeted, street-by-street approach, working on specific issues in a coordinated manner with other relevant agencies, such as community groups, tenants and landlords, would have a much greater and quicker impact.
29. We would also like to see the council develop a strategy that includes action against any tenants who are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket licensing scheme that would adversely affect all professional landlords and tenants alike, while leaving criminals able to operate covertly. Many of the problems are caused by mental health or drink and drug issues. Landlords cannot resolve these issues and these issues will require additional resources from the council to resolve.

¹ www.gov.uk/government/statistics/mortgage-and-landlord-possession-statistics-october-to-december-2016
 National Landlords Association Limited (by guarantee) registered in England number 4601987. The Landlords Association Limited (by guarantee) registered in England number 4336449. VAT Reg. No. 884 7388 60. Both companies are registered at Skyline House-2nd Floor, 200 Union Street, London SE1 0LX

30. In relation to the reduction of antisocial behaviour and the authority that landlords have to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract; they cannot manage behaviour (NB: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords who are confronted with serious antisocial behaviour in one of their properties will be to seek vacant possession. In many instances, they will need to serve a section 21 notice, rather than a section 8 notice, identifying the grounds for possession. The former is simpler and cheaper and repossession (at present) is more certain. No reason need be given for serving a section 21 notice and, in this case, the perpetrator tenant can hypothetically approach the local authority for assistance to be rehoused (NB: Homelessness Guidelines cl 8.2). Crucially, no affected party needs to offer evidence against an antisocial householder, thereby reducing the risk of intimidation, harassment and, ultimately, unsuccessful possession claims. The issue of antisocial behaviour will, thus, not appear as a factor in the repossession. However, when providing evidence to support a licensing application, the document should clarify the position of all the relevant issues under landlord and tenant law.

Requests for supplementary information

31. We are extremely concerned about the gaps in evidence and justification that occur throughout the licensing proposal.
32. We would like clarification on the council's policy in relation to helping a landlord when a section 21 notice is served, the property is overcrowded or the tenant is causing antisocial behaviour, as per what the council says in the consultation. What steps will the council take to support the landlord? It would be useful if the council were to put in place a guidance document before the introduction of the scheme, to outline its position regarding helping landlords to remove tenants who are manifesting antisocial behaviour.
33. We would like a breakdown of antisocial behaviour complaints over the last five years, subdivided into antisocial behaviour that has proven to be housing-related and for the different housing sectors (owner, social and private rented).
34. We would like to know what consideration the council has given to homelessness, where these tenants cannot access the private rented sector.
35. The council has failed to say what additional services will be provided for mental health. This will have an impact on adult social care budgets for the council – and this budget is already under pressure. How much money has been allocated from the council to meet this?
36. Finally, we would like a breakdown of the numbers of orders and powers listed in paragraph 14 that Haringey Borough Council has used over the past five years.

Appendix 6: Haringey Citizens/Generation Rent response

TACKLING ROGUE LANDLORDS IN HARINGEY - THE COMMUNITY CASE FOR SELECTIVE LICENSING

Introduction

During a Haringey Citizens listening campaign in 2017, the issue of poor conditions and rogue landlords in the private rented sector was a consistent issue for people in Haringey. This report examines the state of the Private Rental Sector (PRS) in Haringey and shows why a selective licensing scheme would benefit tenants, and more broadly the borough. Recent rapid expansion of the PRS has left the sector needing increased regulation. Because landlords, through lack of knowledge of standards or in some cases deliberate criminal activity, have left many people experiencing adverse housing conditions. Other London boroughs such as Newham have successfully implemented both additional and selective licensing schemes. This report makes the case for such licensing to be implemented in Haringey, alongside further measures.

This report will be submitted into Haringey Council's Private Rented Property Licensing Consultation running between 11 December 2017 until 5 March 2018.

Decent housing for all

Everyone has the right to a standard of living adequate for the health and well-being of themselves and their family - including housing. However, London is suffering from a housing crisis which is acutely felt by residents in Haringey. Genuinely affordable, good quality housing allows people to participate in society secure in the knowledge they can live in a safe and stable environment that allows the opportunity to learn and grow. Authorities have the responsibility to using all powers available to them to take action to improve the housing market, which is essential to improving physical and mental health and tackling anti-social behaviour.

Haringey Citizens is an alliance of civil society institutions acting to build power for the common good to create local and regional social change, powered by the community organising charity Citizens UK. Generation Rent campaigns for professionally managed, secure, decent and affordable private rented homes in sustainable communities.

What is the problem in Haringey?

Residents are frustrated at a lack of action being taken by the local authority to tackle rogue landlords in the private rented sector. One solution being explored by local authorities such as Haringey is selective landlord licensing.

An area can introduce selective licensing if it can demonstrate some of the following criteria; high levels of deprivation and crime, raised levels of migration, higher levels antisocial behaviour not tackled by private sector landlords and poor property conditions - all of which Haringey falls under.

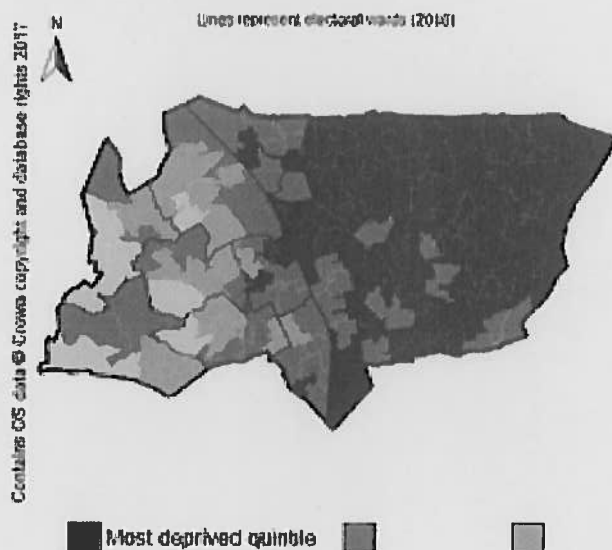
Haringey is home to people some of most deprived neighbourhoods in England, particularly in the east, as shown in image 1. Deprivation is a lack of social and economic capital, and those with highest levels of deprivation experience poorer health outcomes. With regards to migration, the 2011 census showed that 45% of Haringey residents are foreign born, which is far greater than the 2015 national average of 13% (Office for National Statistics, 2015) and proportionately bigger than the London average of 37% (Krausova & Vargas-Silva, 2013). Moreover, in 2015/16 Haringey had 101.8 incidents of crime and anti-social behaviour per 1000 people, which is far higher than the national average of 70 per 1000 people (London Borough of Haringey, 2017).

Nationally the latest statistics show that 28% of PRS homes did not meet the Decent Homes Standards in 2015 (Department for Communities and Local Government, 2017). There is roughly 33,500 PRS homes in Haringey (Haringey Council, 2017), therefore it can be estimated that 9380 PRS homes fail to meet desired standards. It is also estimated that 17% of PRS homes nationally contain a category 1 hazard equating to 5695 PRS homes in Haringey (Department for Communities and Local Government, 2017). Category 1 hazards are problems which can be found within a home that produce a serious or imminent risk to health of the occupant/s. These are outlined in the Hazard Health and Safety Rating System (HHSRS) as shown in the appendix.

Local institutions such as St Ignatius Primary School and St Ignatius Church have been experiencing numerous cases of rogue landlords in the Seven Sisters area. Seven Sisters remains an area of high socio-economic deprivation, with a third of households in the privately rented sector. However, under the Council's proposals for Selective Licensing - Seven Sisters isn't included. Haringey Citizens would like to see more of Seven Sisters included in the Selective Licensing Scheme to ensure some of the most deprived families are included.

Deprivation: a national view

The map shows differences in deprivation in this area based on national comparisons, using national quintiles (fifths) of the Index of Multiple Deprivation 2015 (IMD 2015), shown by lower super output areas. The darkest coloured areas are some of the most deprived neighbourhoods in England.



This chart shows the percentage of the population who live in areas at each level of deprivation.

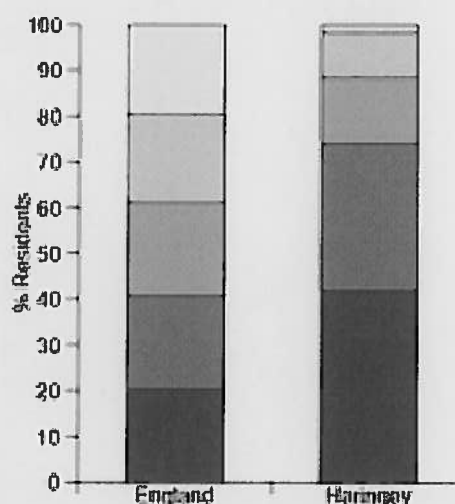


Image 1- Deprivation in Haringey. This shows that the majority of the electoral wards in east Haringey house some of the most deprived people in the country.

Potential solutions - Overview of licensing schemes

In England there are three different types of Licensing. Two types concern only Houses of Multiple Occupancy (HMO). A HMO is a property which contains common amenities (normally bathrooms, kitchens, stairwells) and are occupied by 3 or more non-related people/ families.

- **Mandatory Licensing** - This is obligatory licensing of Houses of Multiple Occupation (HMO) which meet the criteria that they have three or more floors and house five or more unrelated families/individuals.
- **Additional Licensing** - This form of licensing contains provisions to apply licences to HMOs that do not comply with the Mandatory Licensing criteria. This is in place in a lot of London boroughs as seen in image 4.

- **Selective Licensing** - Allows councils to licence all private rental sector properties that are not classified as HMO's, this can be done by streets, wards or entire boroughs.

There is a mixed picture in London where local authorities use these powers available to them to different extents, this is illustrated in image 2.

Despite the issues relating to deprivation, higher levels of migration, level of antisocial behaviour and poor quality housing conditions, Haringey Council is currently not using all of the powers available to them to tackle these problems. They currently only operate an additional licensing scheme for houses of multiple occupancy (HMOs) in the Tottenham area and operate the mandatory HMO licensing which applies throughout England and Wales.



Image 2, (Future of London, 2017)

Newham, the trail blazer for property licensing

In 2013, Newham became the first London Borough to implement a borough wide selective landlord licensing scheme for non-HMO properties, in addition to the mandatory HMO licensing scheme and additional HMO licensing. Newham initially charged £500 for selective licences, renewable after 5 years and offered discounts for early applications and for multiple properties. Newham licensed 24,400 landlords in the first 3 years of selective licensing roll out. During this period they collected £500,000 in rent repayment orders and managed to reclaim £1.3million in evaded council tax. By the end of 2016 they had issued 38,941 licences in all the schemes (London Property Licensing, no date). Their self-financing scheme is worth £12million over 5 years. Crucially, income from the scheme has gone into paying more officers to tackle housing issues (Quinn, no date).

It was found that licence-less landlords were 4 times more likely to have poor property standards than those with the licence. Full information about terms and conditions of individual licences can be viewed in the appendix 3, it states provisions accounting for repairs, antisocial behaviour and overcrowding. Information on individual licences issued to can be accessed on a database on Newham councils' website ensuring tenant and councils know where to contact landlords. Since the implementation of the scheme in Newham there has been a reduction in ASB and wastes in gardens and 81% of residents agree that it has been beneficial in improving conditions (Newham Council, 2015). Newham have just been granted an extension to their licencing scheme ensuring it will be enforced until 2023, licence prices have increased to £800 (London Property Licensing, 2017).

When comparing action taken in Newham to that of Haringey in the last 2 years (illustrated in image 3), Newham have made 1,914 more HHSRS inspections and actioned 600 more prosecutions. The estimated percentage of the 33,500 PRS households in Haringey that have been inspected in the last two years is just 2%. Haringey have also decreased the number of houses being inspected by 63% from 2015/16 to 2016/17. These statistics highlight what licensing can do; increasing the number of inspections allows property improvements to be made, and lead to prosecution of the most serious cases.

2015-2016	2016-2017	2015-2016	2016-2017
Total Number of NHSRS surveys = 495	Total Number of NHSRS surveys = 183	Total Number of NHSRS surveys = 1920	Total Number of NHSRS surveys = 861
Total Number of Prosecutions = 10	Total Number of Prosecutions = 7	Total Number of Prosecutions = 286	Total Number of Prosecutions = 331

Image 3. Haringey v Newham inspection and prosecution totals (provided by the Liberal Democrat Party from Freedom of Information Requests). Other statistics can be seen in appendix 2.

The Benefits of Licensing

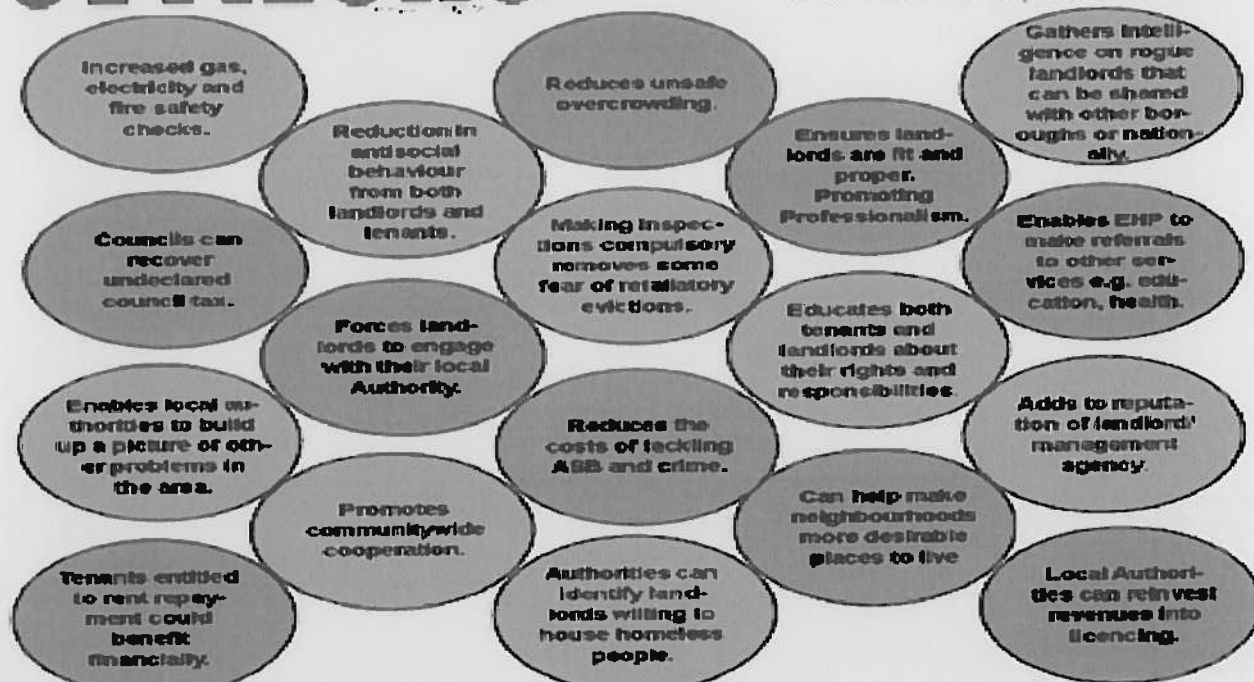


Image 4. Benefits of licencing schemes. Adapted from (Murphy & Mitchell, 2006).

Supporting proactive enforcement

Selective licensing is an important tool to support better enforcement and oversight of the private rented sector, but in order for it to be most effective, local authorities need an enforcement strategy to sit alongside it, and need to show political will to genuinely change conditions in the sector.

Since April 2017, environmental health teams have been able to issue civil penalties for certain housing offences, including poor conditions, in the private rented sector. These powers may often be more suitable than taking court action, because they avoid costly and lengthy legal processes, and the local authority is able to retain all of the money from a penalty, effectively incentivising and self-funding enforcement.

The Mayor of London has just launched his rogue landlord checker, an online database that allows tenants to check if their potential landlord has been convicted of a housing offence in the last year. This empowers tenants, providing them with vital information before they enter a tenancy, and also acts as a deterrent to landlords who may otherwise flout the law.

Currently the database only covers some London boroughs - those who have voluntarily signed up to share their data. Haringey is not currently one of those boroughs, but as part of its moves to improve its private rented sector and tackle rogue landlords, should be looking to be involved as soon as possible.

Recommendations from Haringey Citizens

- Introduction of a selective licensing scheme to cover some of the most deprived areas of Haringey.
- Sign up to the Mayor of London's Rogue Landlord and Agent Checker upon its launch.
- Haringey Council should publicly commit to proactively using civil penalty powers, and have this strategy and commitment passed at a meeting of full council.
- Haringey Council should seek to work together with Environmental Health Departments at Universities - such as Middlesex - to identify houses who are breaking licensing laws.
- Using the revenues from landlord prosecutions, Haringey Council should introduce a landline that residents can anonymously use to safely report their landlord.
- Haringey Council to re-examine the consultation to re-consider including parts of Seven Sisters into the Selective Landlord Licensing Scheme.

Summery

The powers to tackle poor housing conditions are available to local authorities but in Haringey they are not maximised. Introducing areas of selective licensing gives opportunity to inspect housing conditions, give relevant advice, enforce changes and prosecute those responsible where necessary and thus long term drive up the standards of the private rented sector in Haringey.

Acknowledgements

Edhen Soady, Middlesex University

References

Department for Communities and Local Government (2017). *English Housing Survey, Private rented sector, 2015-2016*. London: Department for Communities and Local Government.

Future of London, (2017). *Private Landlord Licensing, A Growing Trend*. Available at: <https://www.futureoflondon.org.uk/2017/10/25/private-landlord-licensing-growing-trend/>. (Accessed: 26/11/2017).

Haringey Council, (2017). *Haringey's Housing Strategy, 2017-2022*. London: Haringey Council.

Krausova, A. & Vargas-Silva, C. (2013) BREIFING. London: Census Profile. Oxford: University of Oxford.

London Borough of Haringey, (2017). *Additional and Selective Licensing - Evidence Base*. Available at: http://www.haringey.gov.uk/sites/haringeygovuk/files/property_licensing_-_6_evidence_base.pdf. Accessed: 29/11/2017)

London Property Licensing, (no date). *London Borough of Newham*. Available at: www.londonpropertylicensing.co.uk/newham. (Accessed: 23/11/2017)

London Property Licensing, (2017). *Newham Council's Selective Landlord Licensing Scheme Extended Until 2023*. Available at: www.londonpropertylicensing.co.uk/newham. (Accessed: 23/11/2017)

Moore, T. & Dunning, R. (2017) *Regulation of the Private Rented Sector in England Using Lessons from Ireland*. York: Joseph Rowntree Foundation.

Murphy, J & Mitchell, S., (2006). *Shelter, Selective Licensing for Local Authorities, A Good Practice Guide*. London: Shelter.

Newham Council, (2014). *Private rented property licencing in Newham: Success of the scheme*. London: Newham Council Communications.

ONS - Office for National Statistics (2015). *Population by Country of Birth and Nationality Estimates Frequently Asked Questions*. London ONS

Public Health England (2017). *Haringey, Unitary authority, Health Profile*. London: Public Health England.

Quinn, A., (no date). *Property Licensing and Smart Enforcement in Newham*. London: Newham Council.

Appendices



Appendix 1: The 29 hazards of the Housing Health and Safety Rating System.

Asset Skills. (2006), *Essential information For Landlords and Agents*. Exeter: Asset Skills.

1 Damp and mould growth

Caused by dust mites, mould or fungal growths caused by dampness and/or high humidities. It includes threats to mental health and social wellbeing caused by living with damp, damp staining and/or mould growth.

Most vulnerable:
14 years or less

2 Excess cold

From sub-optimal indoor temperatures.



Most vulnerable:
65 years plus

3 Excess heat

Caused by excessively high indoor air temperatures.

Most vulnerable:
65 years plus

4 Asbestos (and MMF)

Caused by exposure to asbestos fibres and manufactured mineral fibres (MMF).



Most vulnerable:
no specific group

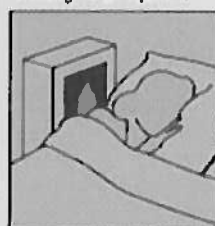
5 Biocides

Threats to health from those chemicals used to treat timber and mould growth in dwellings. Insecticides and rodenticides to control pest infestations (e.g. cockroaches or rats and mice), these are not considered for the purposes of the HHSRS.

Most vulnerable:
no specific group

6 Carbon monoxide and fuel combustion products

Hazards due to excess levels of carbon monoxide, nitrogen dioxide, sulphur dioxide and smoke in the dwelling's atmosphere.



Most vulnerable:
60, 65 years plus. NO₂, SO₂ and smoke, no specific group

7 Lead

Threats to health from the ingestion of lead. **Most vulnerable:** under 3 years

8 Radiation

This category covers the threats to health from radon gas and its daughters, primarily airborne, but also radon dissolved in water. While rare, leakage from microwave ovens might also be considered. Evidence of health risks from low-level exposure to electro-magnetic fields from phone masts have not, to date, been proven.

Most vulnerable:
all persons aged between 60 and 64 years who have had lifetime exposure to radon

9 Uncombusted fuel gas

The threat of asphyxiation due to fuel gas escaping into the atmosphere within a dwelling.

Most vulnerable:
no specific group

10 Volatile organic compounds

VOCs are a diverse group of organic chemicals which includes formaldehyde, that are gaseous at room temperature, and are found in a wide variety of materials in the home.

Most vulnerable:
no specific group

11 Crowding and space

Health hazards linked to a lack of living space for sleeping and normal family/household life.

Most vulnerable:
no specific group

12 Entry by intruders

Problems keeping a dwelling secure against unauthorised entry and the maintenance of defensible space.



Most vulnerable:
no specific group

13 Lighting

Threats to physical and mental health linked to inadequate natural and/or artificial light. It includes the psychological effect associated with the view from the dwelling through glazing.



Most vulnerable:
no specific group

14 Noise

Threats to physical and mental health caused by noise exposure inside the dwelling or within its curtilage.

Most vulnerable:
no specific group

15 Domestic hygiene, pests and refuse

Health hazards due to poor design, layout and construction to the point where the dwelling cannot be readily kept clean and hygienic; access into, and harborage within, the dwelling for pests; and inadequate and unhygienic provision for storing and disposal of household waste.



Most vulnerable:
no specific group

THE EFFECT
OF THE
DEFECT

Housing Health and Safety
Rating System hazards as
defined in the 2005
Regulations



16 Food safety

Threats of infection due to inadequate facilities for the storage, preparation and cooking of food.

Most vulnerable:
no specific group

17 Personal hygiene, sanitation and drainage

Threats of infection and threats to mental health associated with personal hygiene, including personal washing and clothes washing facilities, sanitation and drainage.

Most vulnerable:
children under 5

18 Water supply

The quality and adequacy of the water supply for drinking and for domestic purposes such as cooking, washing, cleaning and sanitation. Also threats to health from contamination by bacteria, protozoa, parasites, viruses, and chemical pollutants.

Most vulnerable:
no specific group

19 Falls associated with baths etc

Falls associated with a bath, shower or similar facility.

Most vulnerable:
60 years plus

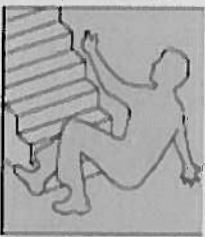
20 Falling on level surfaces etc

Falls on any level surface such as floors, yards and paths. It also includes falls associated with trip steps, thresholds, or ramps, where the change in level is less than 500mm.

Most vulnerable:
60 years plus

21 Falling on stairs etc

Falls associated with stairs, steps and ramps where the change in level is greater than 500mm. It includes falls on internal stairs or ramps within the dwelling, external steps or ramps within the outlying of the dwelling, internal common stairs or ramps within the building, access to the dwelling, and to shared facilities or means of escape in case of fire. It also includes falls over guarding (balustrading).



Most vulnerable:
60 years plus

22 Falling between levels

Falls from one level to another, inside or outside a dwelling, where the difference in levels is more than 500mm. For example, falls out of windows, falls from balconies or landings, falls from accessible roofs, into basement wells, and over garden retaining walls.

Most vulnerable:
under 5 years

23 Electrical hazards

Hazards from electric shock and electricity burns, including from lightning strikes.



Most vulnerable:
under 5 years

24 Fire

Threats from uncontrolled fire and associated smoke. It includes injuries from clothing catching alight, which appears to be common when people attempt to put out a fire. It does not include clothing catching alight from a controlled fire by reaching across a gas flame or an open fire used for space heating.

Most vulnerable:
60 years plus

25 Flames, hot surfaces etc

Burns or injuries caused by contact with a hot flame or fire, and contact with hot objects or hot non-water based liquids, and scalds - injuries caused by contact with hot liquids and vapours. It includes burns caused by clothing catching alight from a controlled fire or flame.

Most vulnerable:
under 5 years

26 Collision and entrapment

This category includes risks of physical injury from trapping body parts in architectural features, such as trapping limbs or fingers in doors or windows. Most vulnerable under 5 years. It includes (colliding with) objects such as architectural glazing, windows, doors, low ceilings and walls.



Most vulnerable:
10 years over

27 Explosions

Threat from the blast of an explosion, from debris generated by the blast, and from the partial or total collapse of a building as the result of an explosion.

Most vulnerable:
no specific group

28 Position and operability of amenities etc

Threats of physical strain associated with functional space and other features at dwellings.



Most vulnerable:
60 years plus

29 Structural collapse and falling elements

The threat of the dwelling collapsing, or of an element or a part of the fabric being displaced or falling because of inadequate fixing or disrepair, or as a result of adverse weather conditions. Structural failure may occur internally or externally.

Most vulnerable:
no specific group

Appendix 2. - These tables show the statistics compiled by the Liberal Democrats. Comparing Haringey and Newham boroughs.

Table (1). Haringey. This table shows number of inspections, category one hazards found and legal action taken by Haringey council in the past two years.

	2015/2016	2016/2017	Year on year change
Total number of inspections using the HHSRS	495	183	-312
Total number of category 1 hazards found	229	73	-156
Total number of improvement notices served	118	33	-85
Total number of prohibition notices served	25	20	-5
Total number of hazard awareness notices served	-	0	-
Number of housing prosecutions made by the local authority	10	7	-3

"-" means not recorded

Table (2). Newham. This table shows number of inspections, category one hazards found and legal action taken by Newham council in the past two years.

	2015/2016	2016/2017	Year on year change
Total number of inspections using the HHSRS	1920	861	-1059
Total number of category 1 hazards found	-	384	-
Total number of improvement notices served	58	101	+53
Total number of prohibition notices served	10	20	+10
Total number of hazard awareness notices served	0	0	-
Number of housing prosecutions made by the local authority	286	331	+45

"-" means not recorded

Appendix 7: Neighbouring borough responses to survey (marked up questionnaire)

Private Rented Properties – Licensing consultation

We want your views on our proposal to introduce two new property licensing schemes to improve the local environment and the housing conditions of renters in the private sector.

The survey will take around 5 minutes to complete.

The consultation opens on 11th December 2017 and closes on 5th March 2018. The results and final recommendations will be reported back to Cabinet in June 2018. If you have any queries please email PropertyLicensing@haringey.gov.uk

What is property licensing?

Local Councils can choose to require private landlords or their agents to obtain a licence to rent out their property. A licence usually lasts for five years and landlords have to keep their property safe and well maintained as well as deal with any problems associated with the property such as dumped rubbish, untidy gardens or anti-social behaviour.

There are three types of licensing schemes:

Mandatory Licensing – Since 2004, all councils have had to run a licensing scheme for large houses in multiple occupation (HMOs). Any HMO that has three or more storeys with five or more people living as two or more households and sharing amenities has to be licensed.

Additional Licensing – Councils can introduce Additional Licensing to cover any other type of HMO in their area.

Selective Licensing – this type of scheme covers all other private rented properties.

Further information about the different types of licensing can be found [here](#).

Landlords have to pay a licensing fee for each property they rent out. The licensing fee covers the cost of the scheme and allows the council to employ staff to check the condition of private rented properties in the area and make sure that the correct management arrangements are in place. The fee can also be used to support landlords by offering them advice and guidance.

Haringey already has two licensing schemes – A Mandatory licensing scheme and an Additional licensing scheme in the Tottenham area.

The Council believes that extending their current licensing scheme to cover all HMOs in the borough as well as introducing a Selective Licensing Scheme for all other privately rented properties in smaller areas across the borough will:

- Improve the living arrangements of many private sector tenants by improving the condition of properties.
- Reduce property related crime, anti-social behaviour and rubbish dumping.
- Support good landlords and remove rogue landlords from operating in the borough.
- Improve the image of an area, making it a desirable place to live.

Additional and Selective Licensing Questionnaire

Q1 Which of the following best describes you? (Please tick all that apply)

- 0 (0%) A resident of Haringey
- 0 (0%) A landlord with a property (or number of properties) in Haringey
- 0 (0%) A landlord living outside of Haringey with a property (or number of properties) in Haringey.
- 0 (0%) An agent, managing properties in Haringey
- 0 (0%) A business operating in Haringey
- 0 (0%) A community group or charity operating in Haringey
- 10 (100%) A resident / landlord / business in a neighbouring borough to Haringey
- 0 (0%) Other (Please specify below)
- 0 (0%)

Q2 Which of the answers best describes your housing tenure? (Please tick one box only)

- 0 (0%) Owned or buying with a mortgage
- 0 (0%) Rented from Housing Association, Trust or the Council
- 0 (0%) Renting from a private landlord
- 0 (0%) Living with family or friends
- 0 (0%) Owner renting out a spare room
- 0 (0%) Homeless
- 0 (0%) Living in temporary accommodation
- 0 (0%) Other (Please specify below)
- 0 (0%)

Q3 Which area of Haringey do you live in? (Please tick one of the following)

This will help us see where responses are coming from in Haringey.

0 (0%) N2

0 (0%) N10

0 (0%) N17

0 (0%) N4

0 (0%) N11

0 (0%) N18

0 (0%) N6

0 (0%) N13

0 (0%) N22

0 (0%) N8

0 (0%) N15

Q4 Which area of Haringey do you operate a business or organisation in? (Please tick all that apply)

This will help us see where responses are coming from in Haringey.

0 (0%) N2

0 (0%) N10

0 (0%) N17

0 (0%) N4

0 (0%) N11

0 (0%) N18

0 (0%) N6

0 (0%) N13

0 (0%) N22

0 (0%) N8

0 (0%) N15

Q5 Which area of Haringey do you have/manage properties in? (Please tick all that apply)

This will help us see where responses are coming from in Haringey.

0 (0%) N2

0 (0%) N10

0 (0%) N17

0 (0%) N4

0 (0%) N11

0 (0%) N18

0 (0%) N6

0 (0%) N13

0 (0%) N22

0 (0%) N8

0 (0%) N15

Q6 Where do you live? (please state which borough)

7 (100%)

Scheme proposal

Haringey's proposal for introducing Additional and Selective Licensing includes:

• **Additional Licensing** – a borough wide scheme that will require all HMOs in Haringey to be licensed.

Please click on the link to find further information on the type of HMO included: [Type of HMO included within the proposed Additional Licensing Scheme](#)

• **Selective Licensing** – a scheme that will require all other privately rented properties located in 29 selected areas, to be licensed.

Please click on the link to find further information on the 29 areas: [Proposed Selective Licensing Areas](#)

• **A set of conditions that all landlords have to follow** – the council believes that the conditions will lead to better managed properties, a reduction in anti-social behaviour (specifically untidy front gardens and dumping of rubbish) and an improvement in living conditions for tenants.

Please click on the links below to find further information on the Licensing Conditions.

[Additional Licensing Conditions HMOs](#)

[Selective Licensing Conditions](#)

• **A license fee that all landlords will have to pay** – the fee will cover the cost of running the scheme. The council cannot make a profit from the scheme.

The Schemes

Q7 **To what extent would you support the proposal to implement a...** (Please tick one box only for each scheme)

	Fully support	Partially support	Do not support	Don't know/not sure
a. Borough wide Additional (HMO) licensing scheme?	2 (20%)	1 (10%)	6 (60%)	1 (10%)
b. Selective licensing scheme in the 29 areas?	1 (10%)	2 (20%)	7 (70%)	0 (0%)

Q8 **Please tell us the reason for your answer about a borough wide Additional licensing scheme in the box below.**

5 (100%)

Q9 **Please tell us the reason for your answer about a Selective licensing scheme in the box below.**

6 (100%)

Q10 **What impact, if any, do you feel implementing a...** (Please tick one box only for each scheme)

	A positive impact	No impact	A negative impact	Don't know/not sure
a. Borough wide Additional (HMO) licensing scheme would have on you?	3 (30%)	1 (10%)	6 (60%)	0 (0%)
b. Selective licensing scheme would have on you?	3 (30%)	0 (0%)	7 (70%)	0 (0%)

Q11 Please tell us the reason for your answer about a borough wide Additional licensing scheme in the box below.

6 (100%)

Q12 Please tell us the reason for your answer about a Selective licensing scheme in the box below.

6 (100%)

The Licensing Fee

(In setting the licence fee the Council has estimated how much it will cost to run the scheme)

Please click [here](#) for more information on the license fees

Q13 To what extent do you feel the fees are a reasonable figure if the licensing schemes were to be introduced? (Please tick one box only for each scheme)

	Totally reasonable	Fairly reasonable	Fairly unreasonable	Totally unreasonable	Don't know/not sure
a. Additional licensing scheme (HMOs) fees	1 (10%)	2 (20%)	1 (10%)	5 (50%)	1 (10%)
b. Additional licensing scheme (HMOs) <u>other</u> fees/charges	1 (10%)	1 (10%)	1 (10%)	6 (60%)	1 (10%)
c. Selective licensing scheme fees	1 (10%)	1 (10%)	1 (10%)	6 (60%)	1 (10%)
d. Selective licensing scheme <u>other</u> fees/charges	1 (10%)	1 (10%)	1 (10%)	6 (60%)	1 (10%)

Q14 Please tell us the reason for your answer about fees for a borough wide Additional licensing scheme in the box below.

4 (100%)

Q15 Please tell us the reason for your answer about other fees/charges for a borough wide Additional licensing scheme in the box below.

4 (100%)

- Q16 Please tell us the reason for your answer about fees for a Selective licensing scheme in the box below.
4 (100%)
- Q17 Please tell us the reason for your answer about other fees/charges for a Selective licensing scheme in the box below.
4 (100%)

The Conditions

(a set of licensing standards all landlords must adhere to for both the management and condition of the property)

Q18 Do you feel that the licensing conditions are reasonable and will improve the standard of private rented housing? (Please tick one box only for each scheme)

	Yes	No	Don't know
a. Additional licensing scheme (HMOs) conditions	2 (20%)	7 (70%)	1 (10%)
b. Selective licensing scheme conditions	2 (20%)	7 (70%)	1 (10%)

- Q19 Please tell us the reason for your answer about a borough wide Additional licensing scheme conditions in the box below.
4 (100%)
- Q20 Please tell us the reason for your answer about a Selective licensing scheme conditions in the box below.
4 (100%)

Other suggestions and comments

Q21 Please use the box below to provide any other comments or suggestions on the proposals. (100-word limit)

4 (100%)

Public meetings and drop in sessions

Q22 If you are interested in attending one of the public meetings (places will be reserved on a first come first served basis) or consultation drop in sessions at various locations across the borough, please provide your name and email address below:

(This information will be passed onto the council to get in touch with you)

Name: 1 (100%)

Email address: 1 (100%)

Q23 Haringey Council will publish the results of the consultation on their website. If you wish to be notified when the results are available, please provide your name and email address below:

(This information will be passed onto the council to get in touch)

Name: 2 (100%)

Email address: 2 (100%)

Q24 Alternatively, if you are unable to provide an email address, please provide your postal address below:

(This information will be passed onto the council to get in touch)

Address: 0 (0%)

About you

Haringey Council are committed to make Haringey a fair and equal borough. In order to do this, we are collecting equality monitoring data to understand inequalities in the borough. This helps the council to demonstrate how they meet their legal duties under the Equality Act 2010. All data collected is for monitoring purposes only and is held under the Data Protection Act 1998.

Q25 How old are you? (Please tick one box only)

- 0 (0%) Under 20
- 0 (0%) 21-24
- 0 (0%) 25-29
- 1 (10%) 30-44
- 7 (70%) 45-59
- 1 (10%) 60-64
- 0 (0%) 65-74
- 0 (0%) 75-84
- 0 (0%) 85-89
- 0 (0%) 90 and over
- 1 (10%) Prefer not to say

Q26 Are you....? (Please tick one box only)

- 3 (30%) Male
- 7 (70%) Female

Q27 Does your gender differ from your birth sex? (Please tick one box only)

- 0 (0%) Yes
- 10 (100%) No
- 0 (0%) Prefer not to say

Q28 Are you pregnant? (Please tick one box only)

- 0 (0%) Yes
- 7 (100%) No

Q29 Have you had a baby in the last 12 months? (Please tick one box only)

- 0 (0%) Yes
- 7 (100%) No

Q30 What is your marital status? (Please tick one box only)

- 2 (20%) Single
- 5 (50%) Married
- 0 (0%) Co-habiting
- 0 (0%) Separated
- 1 (10%) In a same sex civil partnership
- 1 (10%) Divorced
- 0 (0%) Widowed
- 1 (10%) Prefer not to say

Q31 Are you...?

- 0 (0%) A refugee
- 0 (0%) An asylum seeker
- 10 (100%) Neither of the above

Q32 What country or region are you a refugee/asylum seeker from?

0 (0%)

Q33 Which of the following best describes your sexual orientation? (Please tick one box only)

- 0 (0%) Bisexual
- 1 (10%) Gay/Lesbian
- 5 (50%) Heterosexual/Straight
- 4 (40%) Prefer not to say

Q34 What is your ethnic background? (Please tick one box only)

2 (20%) White: British	01	1 (10%) Asian: Indian	13
1 (10%) White: Irish	02	0 (0%) Asian: Pakistani	14
0 (0%) White Other: Gypsy/Roma	03	0 (0%) Asian: Bangladeshi	15
0 (0%) White Other: Greek/Greek Cypriot	04	0 (0%) Asian: East African Asian	16
0 (0%) White Other: Turkish	05	0 (0%) Asian Other (please specify)	17
0 (0%) White Other: Kurdish	06	0 (0%) Black: African	18
0 (0%) White Other: Irish Traveller	07	1 (10%) Black: Caribbean	19
1 (10%) White Other: (please specify)	08	0 (0%) Black Other (please specify)	20
0 (0%) Mixed: White and Black Caribbean	09	0 (0%) Chinese or other ethnic group: Chinese	21
0 (0%) Mixed: White and Black African	10	0 (0%) Any other ethnic background (please specify)	22
0 (0%) Mixed: White and Asian	11		
0 (0%) Mixed Other (please specify)	12	4 (40%) Prefer not to say	23
please write in below			
0 (0%)			

Q35 Please tick the box that best describes your first language. (Please tick one box only)

- 0 (0%) Albanian
- 0 (0%) Arabic
- 8 (80%) English
- 1 (10%) French
- 0 (0%) Lingala
- 0 (0%) Somali
- 0 (0%) Turkish
- 1 (10%) Other (please specify)
- 0 (0%)

Disability

Under the Equality Act 2010, a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day-to-day activities. Haringey Council accepts the social model of disability. However, in order to be able to identify and respond to your specific needs, it is important to know what kind of disability you have.

Q36 Do you consider yourself to be a disabled person? (Please tick one box only)

0 (0%) Yes

10 (100%) No

Q37 [If yes] Is your disability related to any of the following...? (Please tick all that apply)

0 (0%) Blindness or partial loss of sight

0 (0%) Deafness or partial loss of hearing

0 (0%) Developmental disorder

0 (0%) Learning disability

0 (0%) Long term illness or condition

0 (0%) Mental ill health

0 (0%) Physical disability

0 (0%) Other disability (please write in below if you wish)

0 (0%)

Thank you for taking the time to complete this questionnaire.