

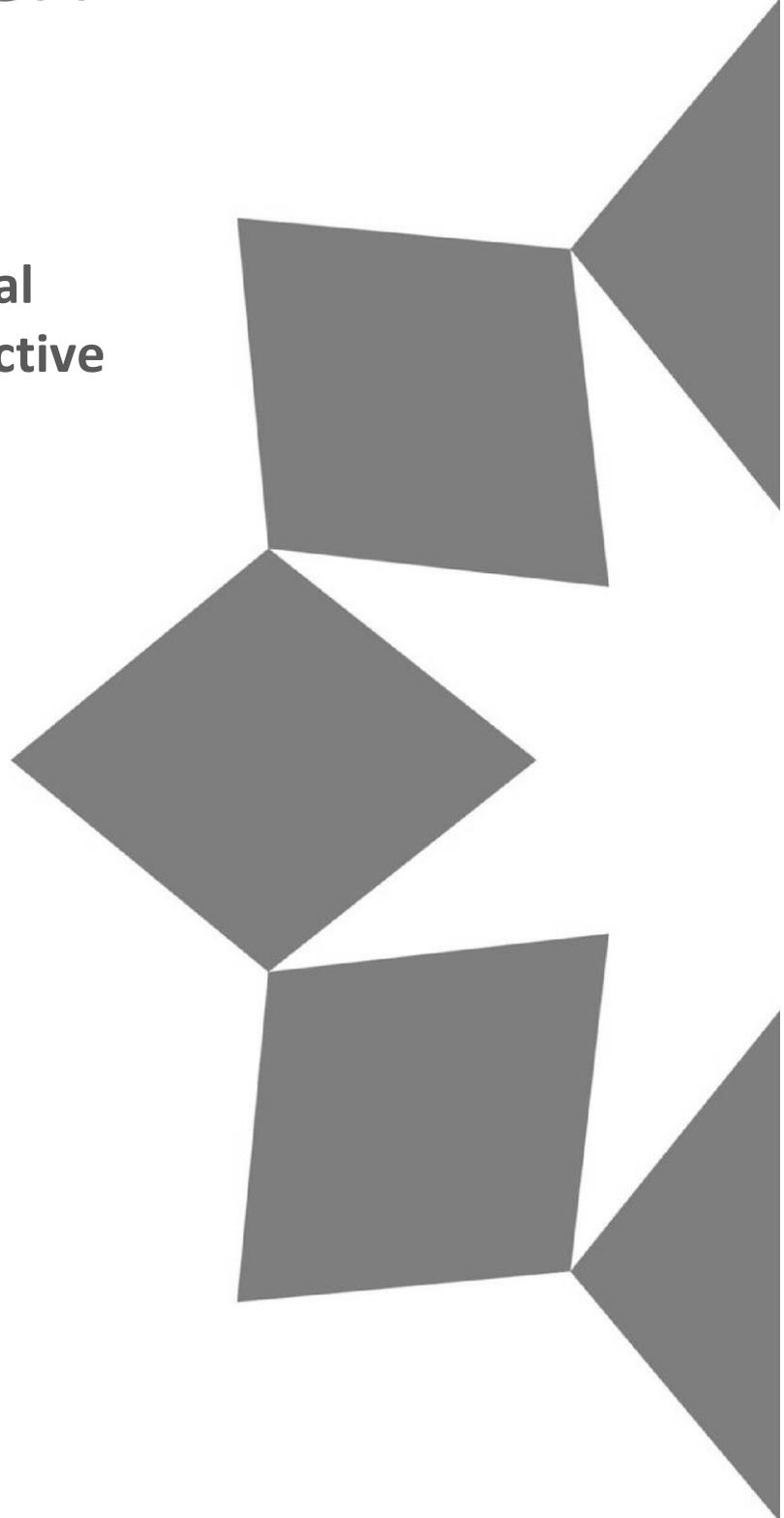


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**Consultation on additional
(HMO) licensing and selective
licensing in Haringey**

Haringey Council

**Final Report
March 2018**





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Title	Consultation on Additional (HMO) housing licensing in Haringey
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Project number	17142
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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.

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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).

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 fee 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

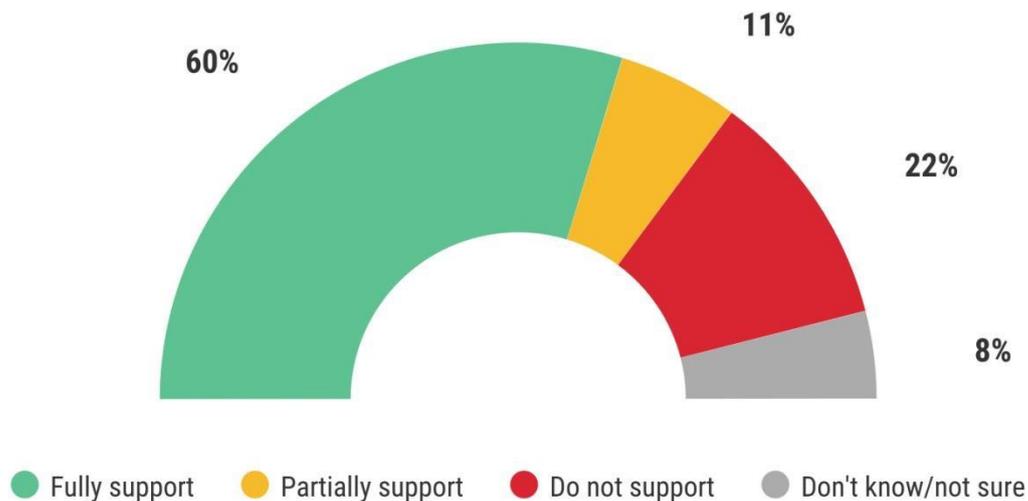
This section of the report presents the results from the consultation.

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.

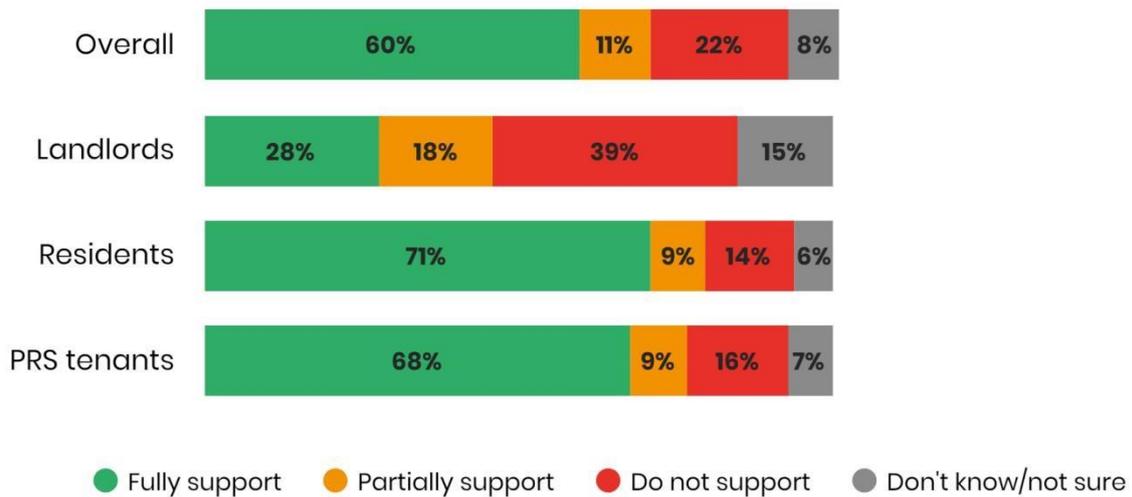
Around seven out of ten respondents (71%) support the proposal to introduce a borough-wide Additional Licensing scheme, whilst around a fifth (22%) do not support it.

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)

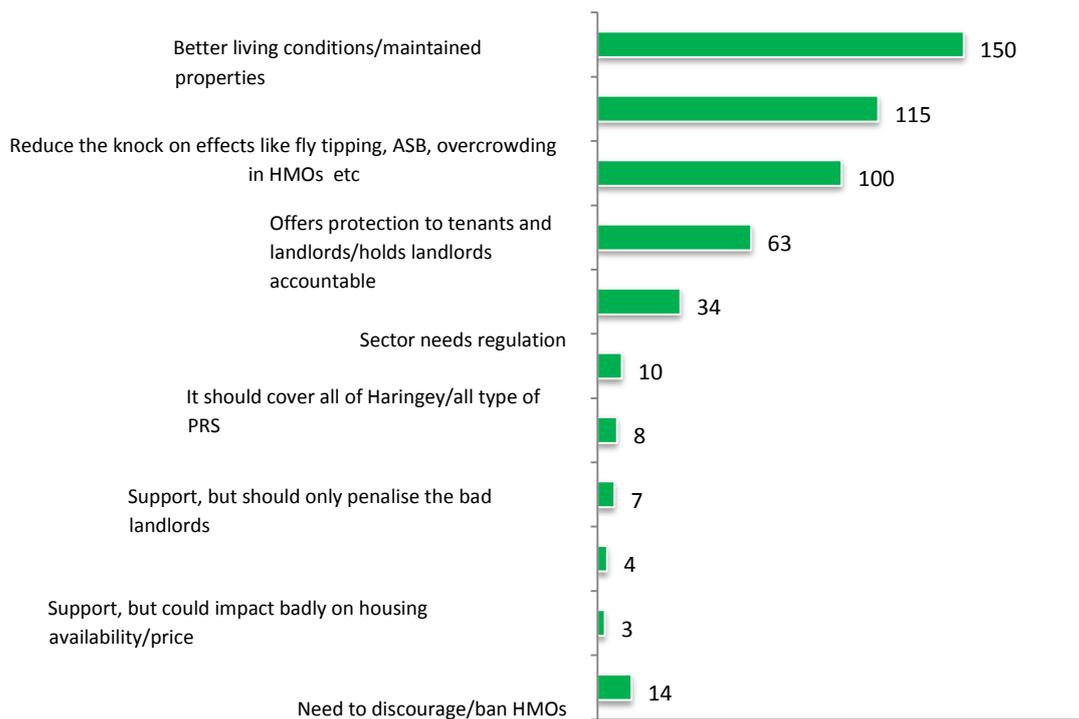


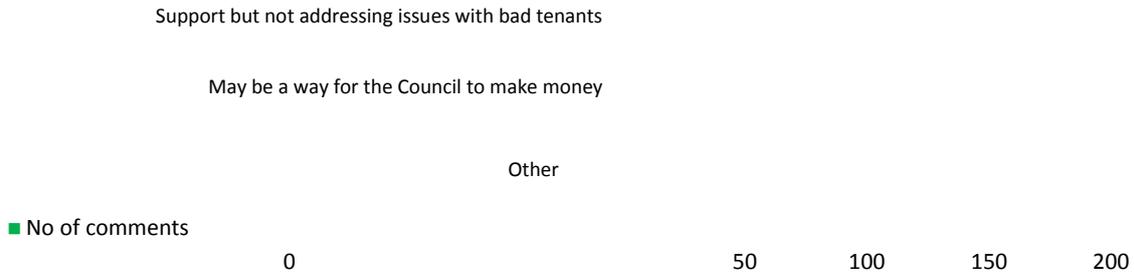
Comments on support for Additional Licensing

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)

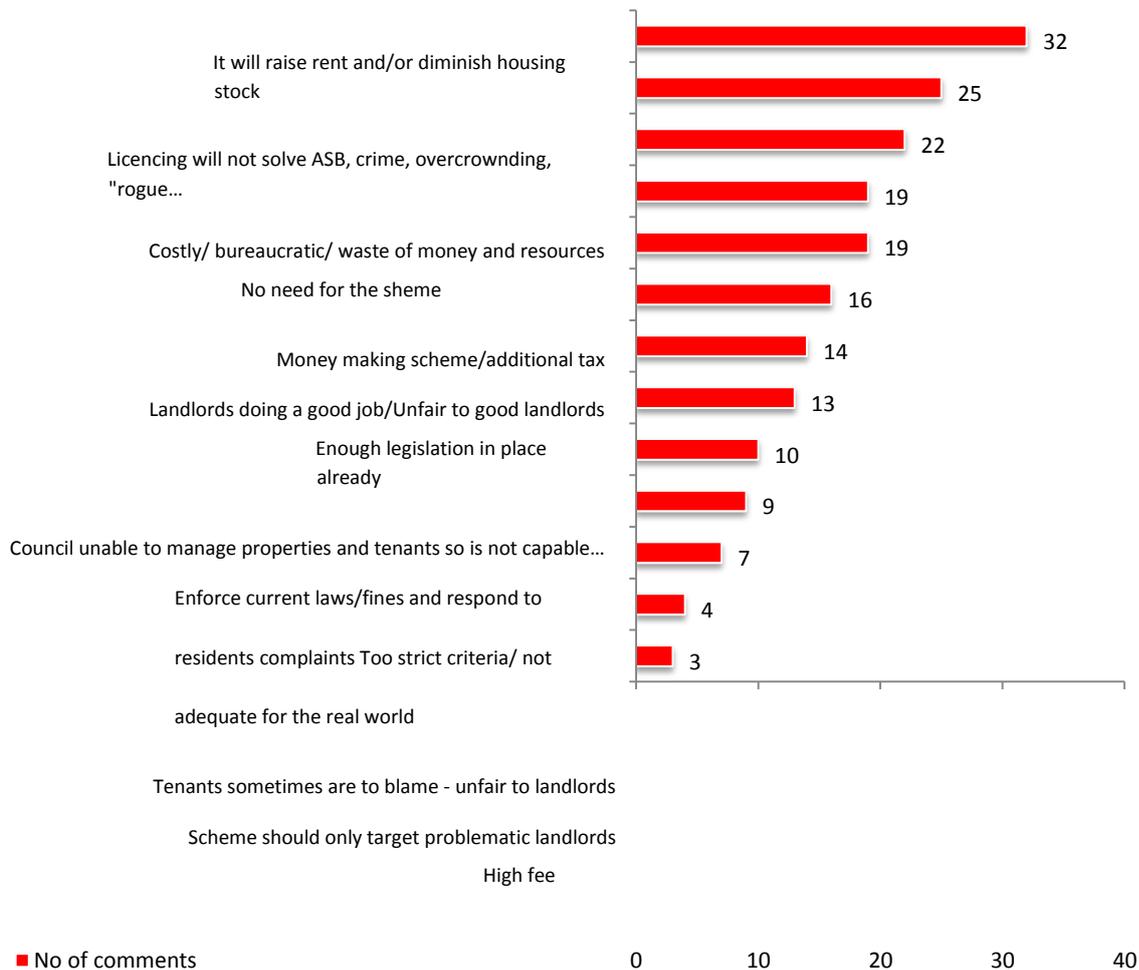




Reasons for opposing an Additional Licensing scheme

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’.

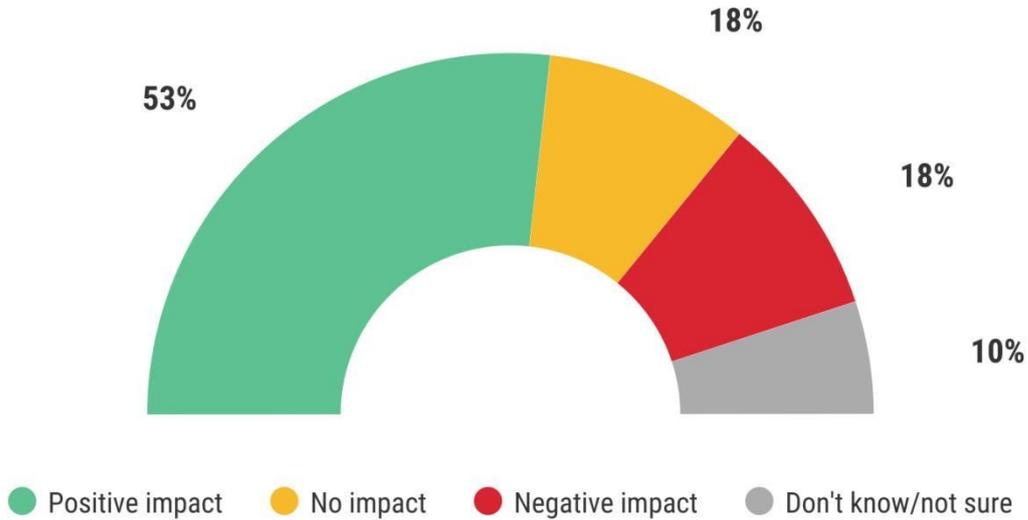
Figure 4: Reasons for not supporting the introduction of Additional (HMO) Licensing (coded comments)



Likely impact on respondents

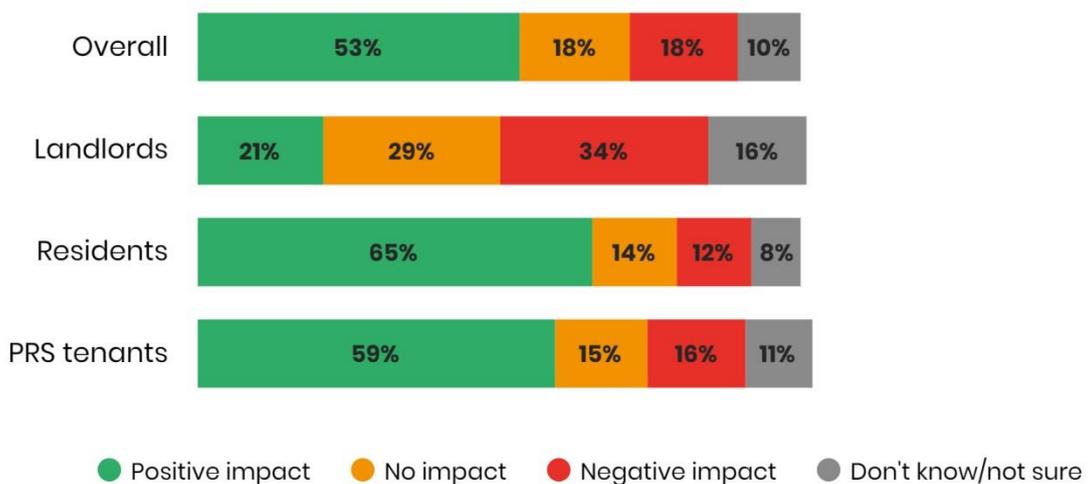
Around half of respondents (53%) feel that introducing Additional Licensing will have a positive impact on them, whilst one in five (18%) feel it will have a negative impact. One in five feel it will have no impact (18%).

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

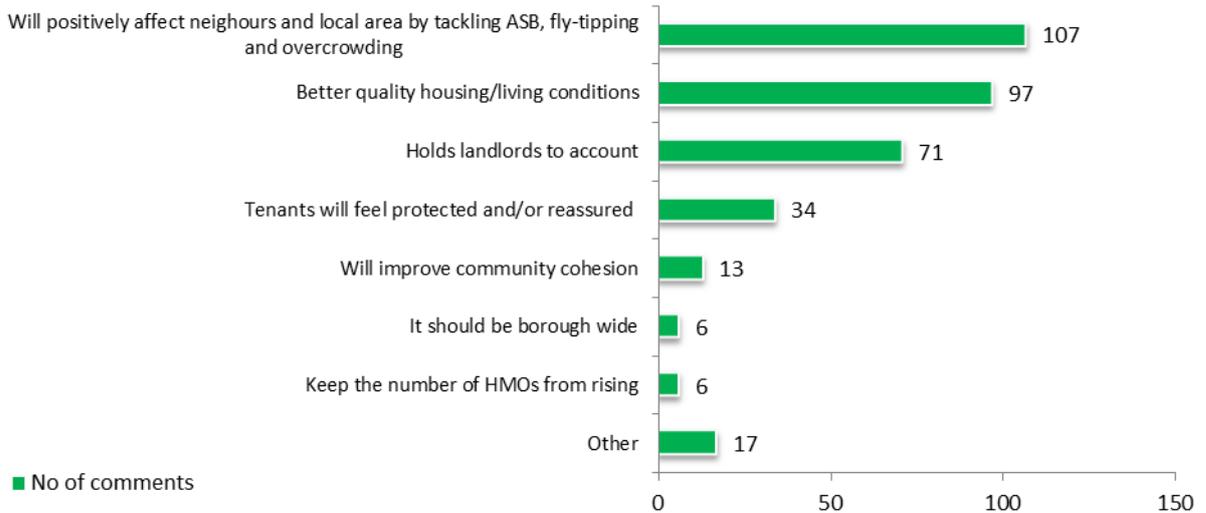
87 respondents provided comments on why they think Additional Licensing will have a negative impact on them. The most common reason is that it is 'unfair and costly to landlords (especially small/good landlords)' (41 comments), followed by 'costs will be passed onto tenants' (30 comments) and that there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

Reasons why Additional Licensing will have a no impact

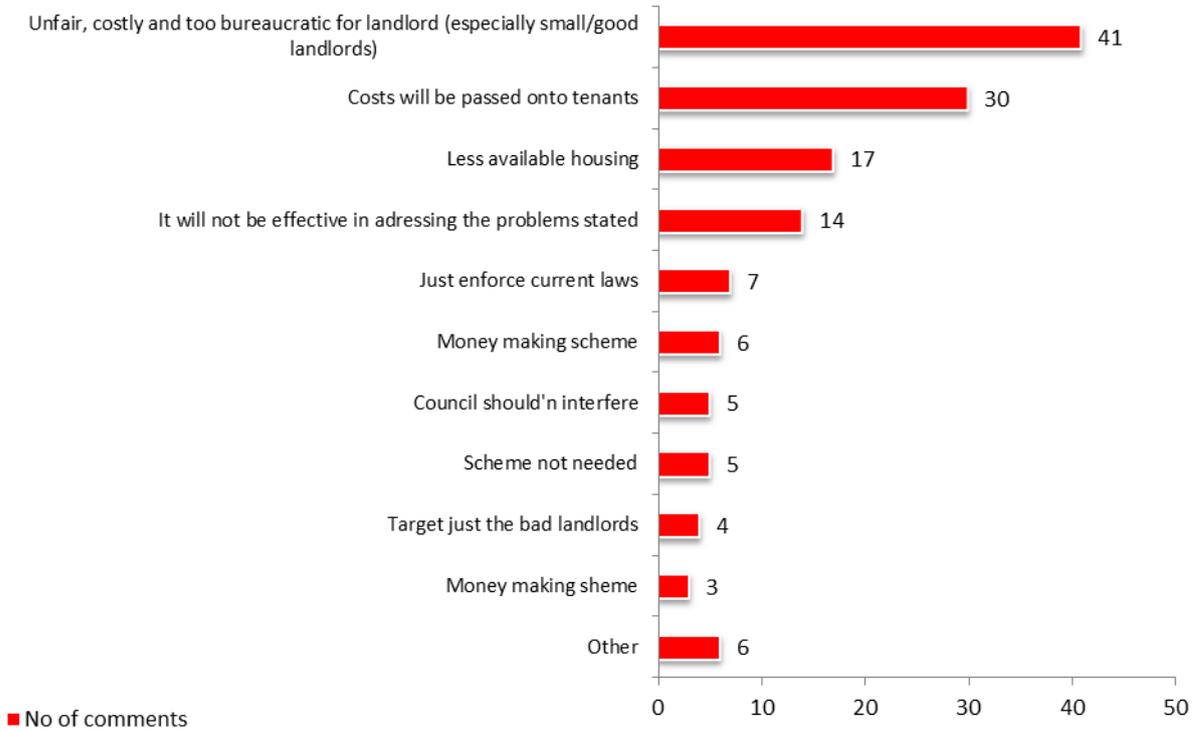
Finally, those who said that licensing will have no impact were asked to give reasons why. The most common reason given is that it will have 'no impact on me personally' as they don't rent/own an HMO (48 comments), followed by the scheme 'will not solve the problems' (10 comments) or that their 'property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

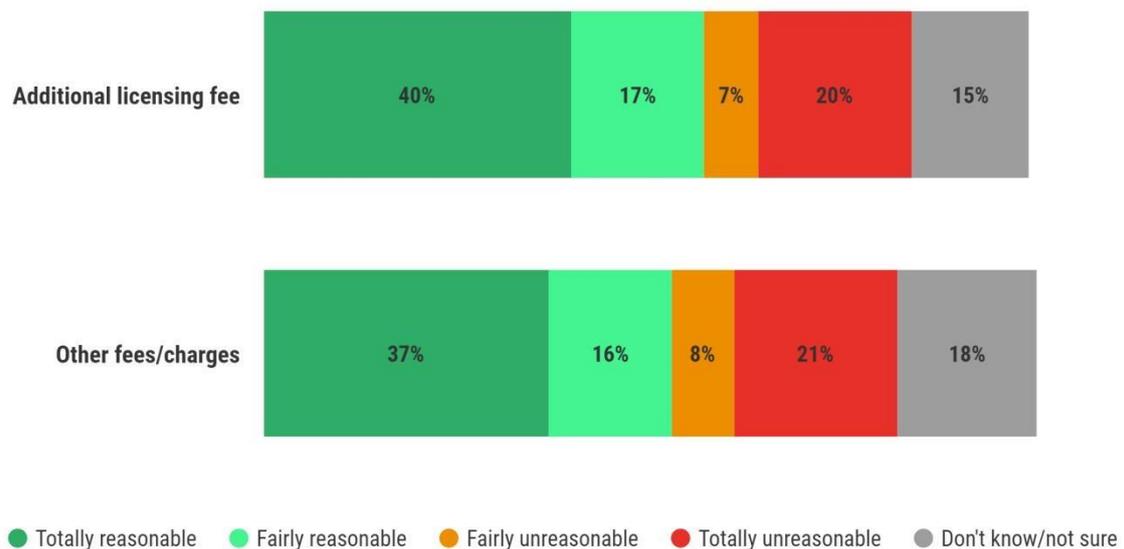


Additional Licensing fees

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.

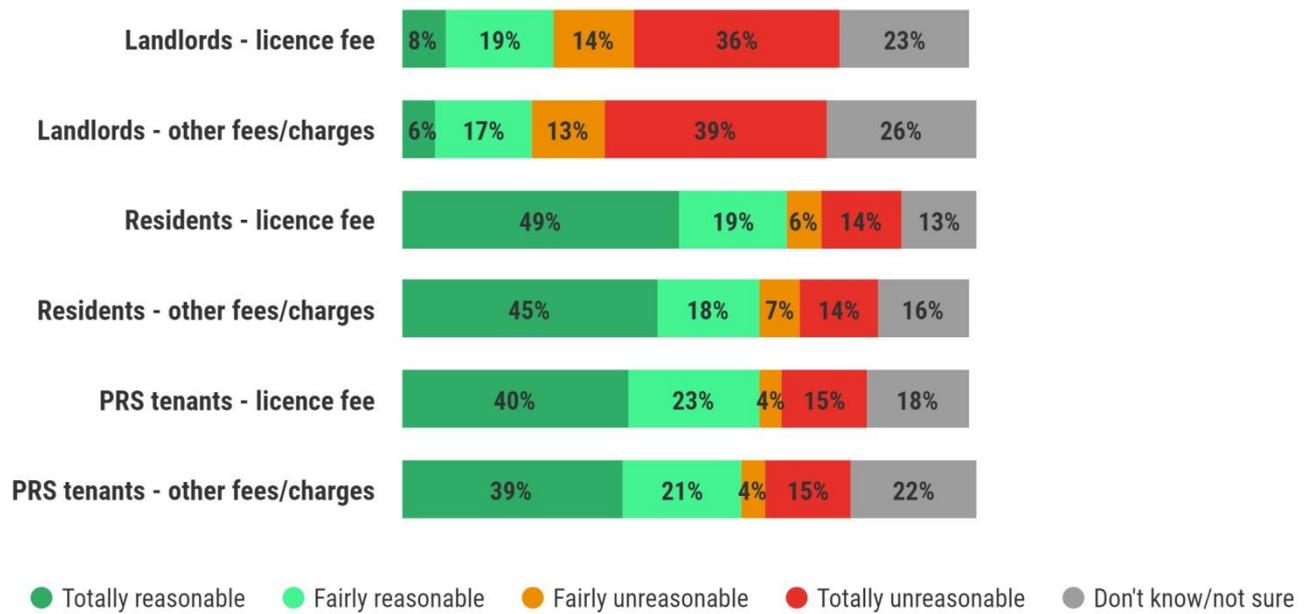
Figure 8: How reasonable are the proposed Additional Licensing fee and other fees/charges (overall)?



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).

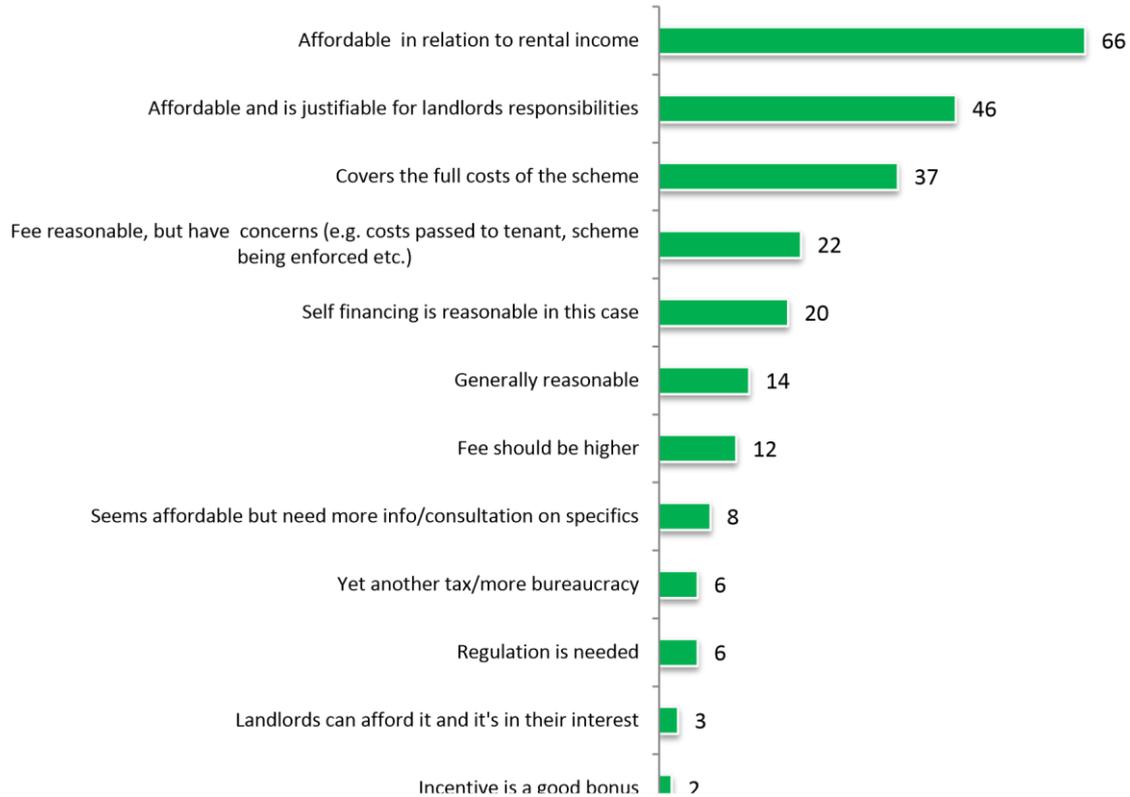
Reasons why Additional Licensing fees and other fees/charges are unreasonable

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).

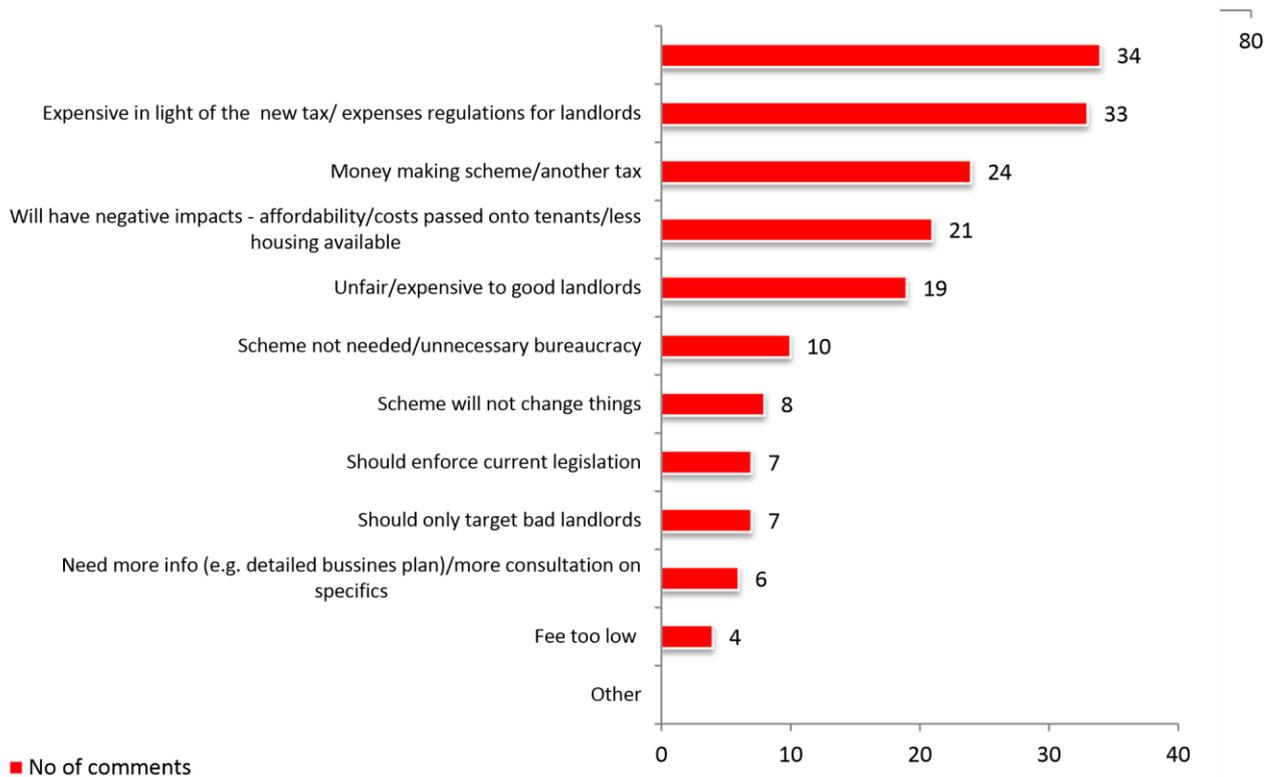
Reasons were again almost identical when respondents were asked why they felt that the other fees/charges were unreasonable (119 respondents). The same top 3 reasons were cited (33, 29 and 25 comments respectively).

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

Reasonable



Unreasonable

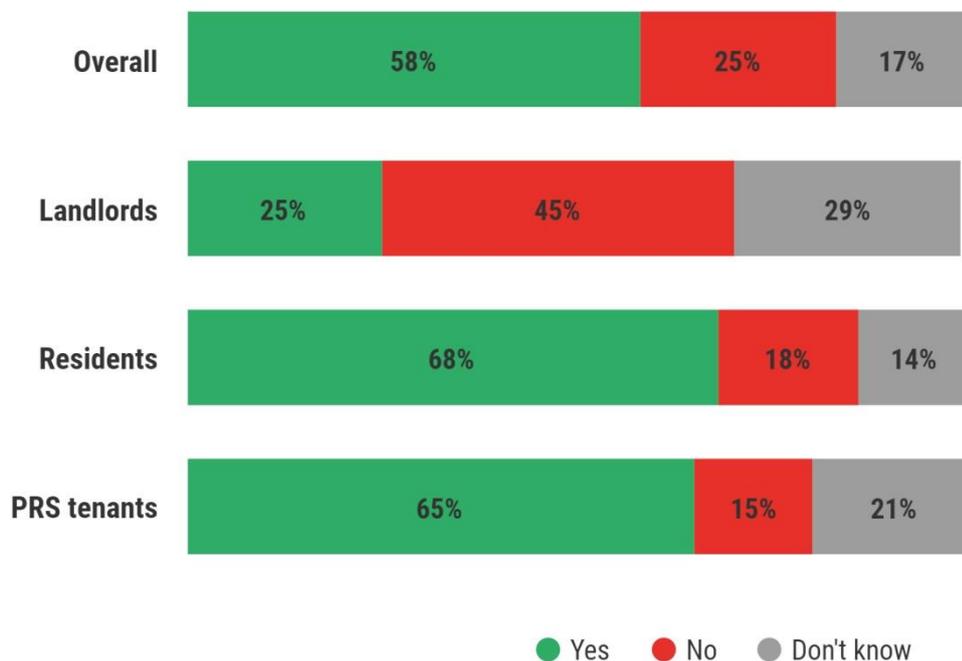


Additional Licensing conditions

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

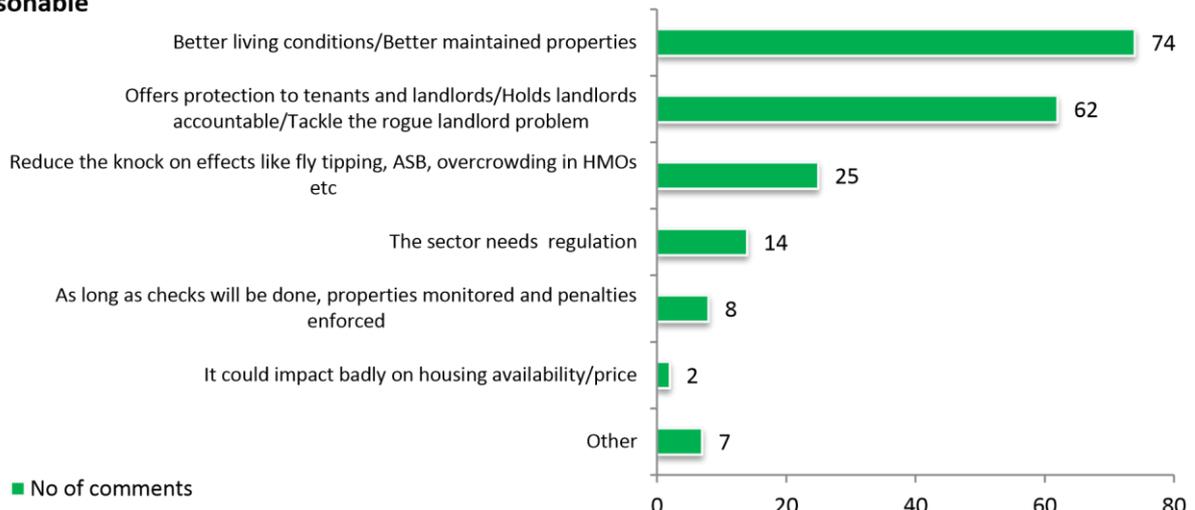
Respondents who said that the additional licensing conditions are reasonable and will improve standards of private rented housing were asked to give their reasons why. There were 140 valid comments to the question, although many referred to their previous comments. The most common responses are that 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

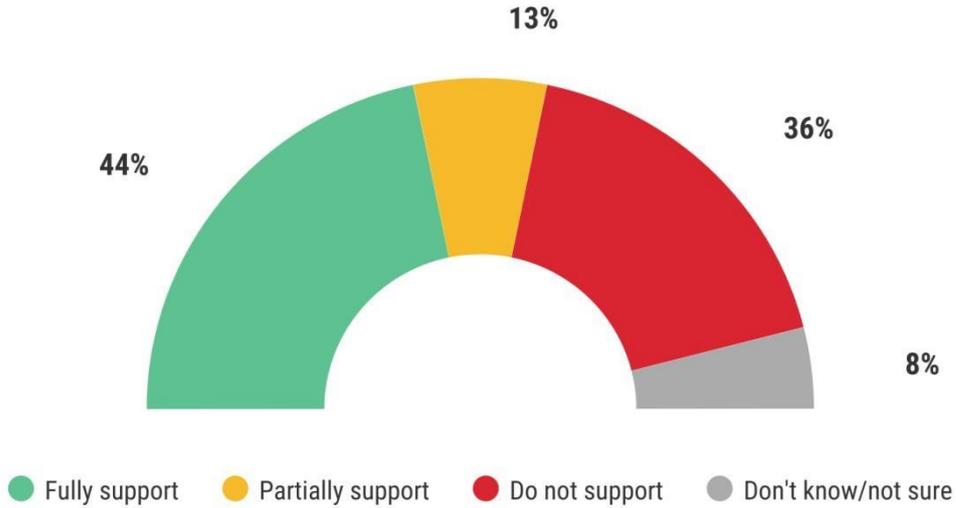


Introduce Selective Licensing in selected areas of Haringey

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.

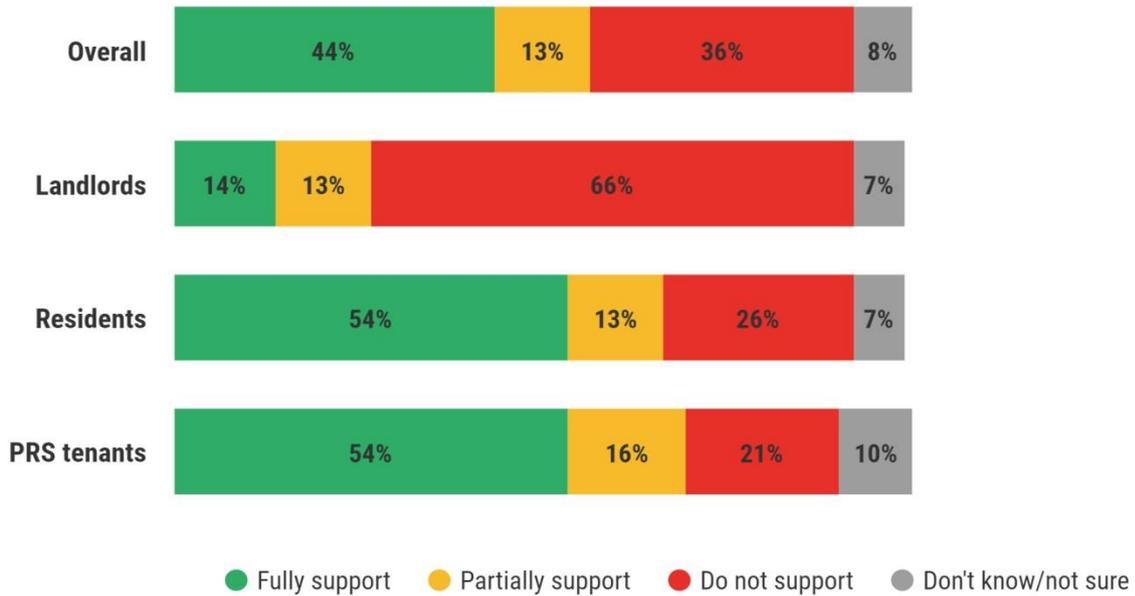
Support for introducing Selective Licensing in parts of the borough is reasonably well supported, with over half of respondents (57%) saying they support it. Over a third however (36%), do not support the proposal. This shows that support for Selective Licensing in Haringey is not as high as it is for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



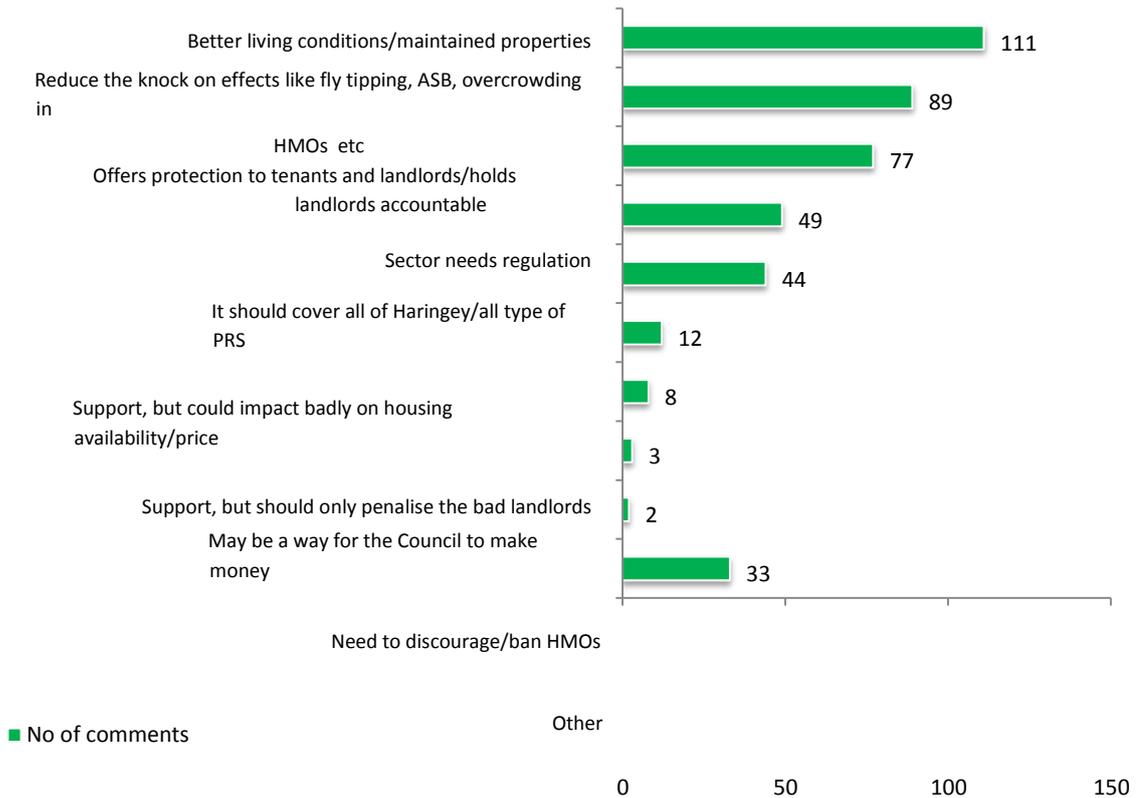
Comments on support for Selective Licensing

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).

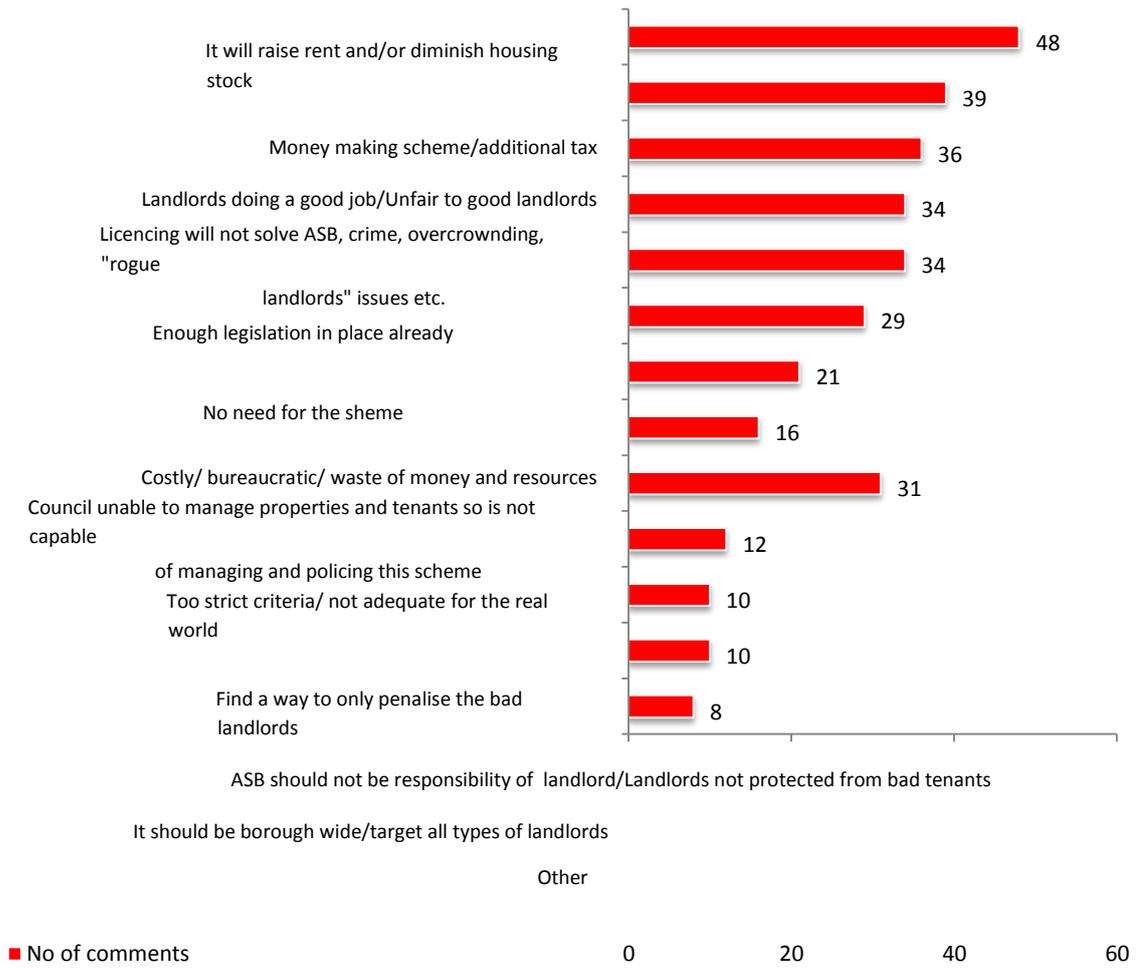
Figure 15: Reasons for supporting the introduction of Selective Licensing (coded comments)



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).

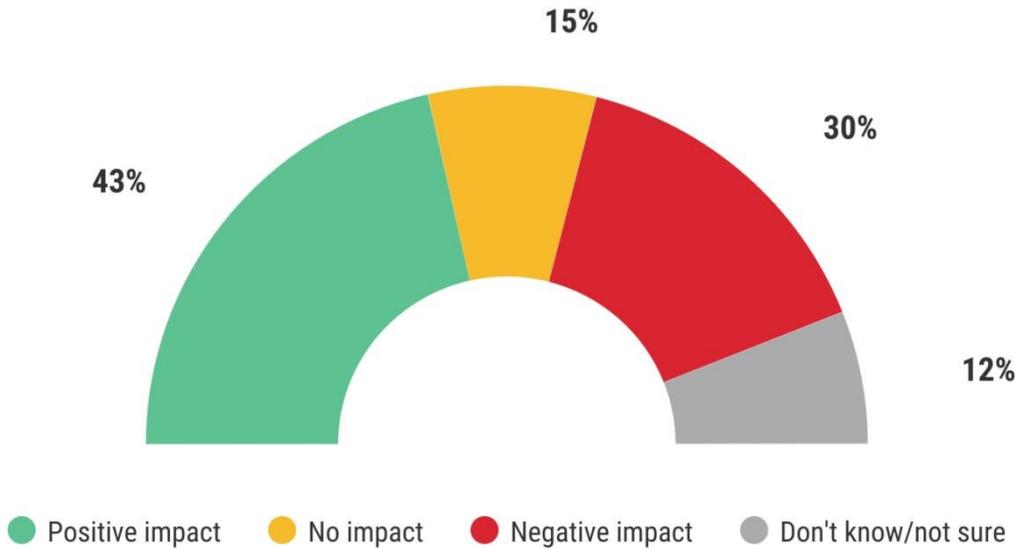
Figure 16: Reasons for not supporting the introduction of Selective Licensing (coded comments)



Likely impact on respondents

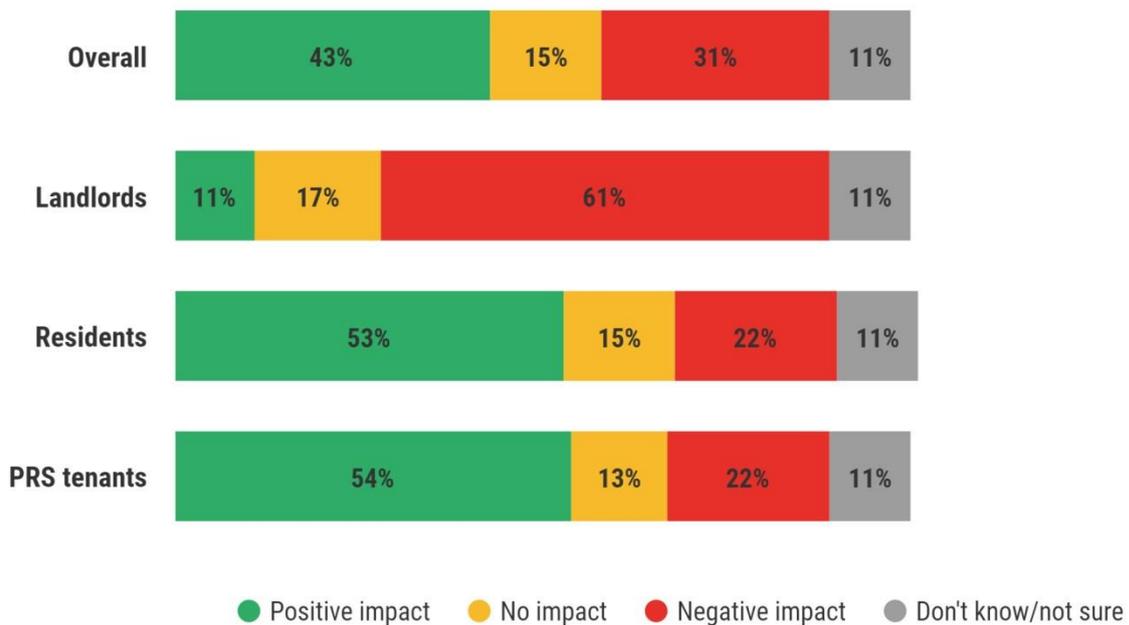
Respondents were asked what impact, if any, introducing a Selective Licensing scheme will have on them. Just under six out of ten respondents overall (58%) feel it will have a positive impact. However, three out of ten (30%) feel it will have a negative impact.

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

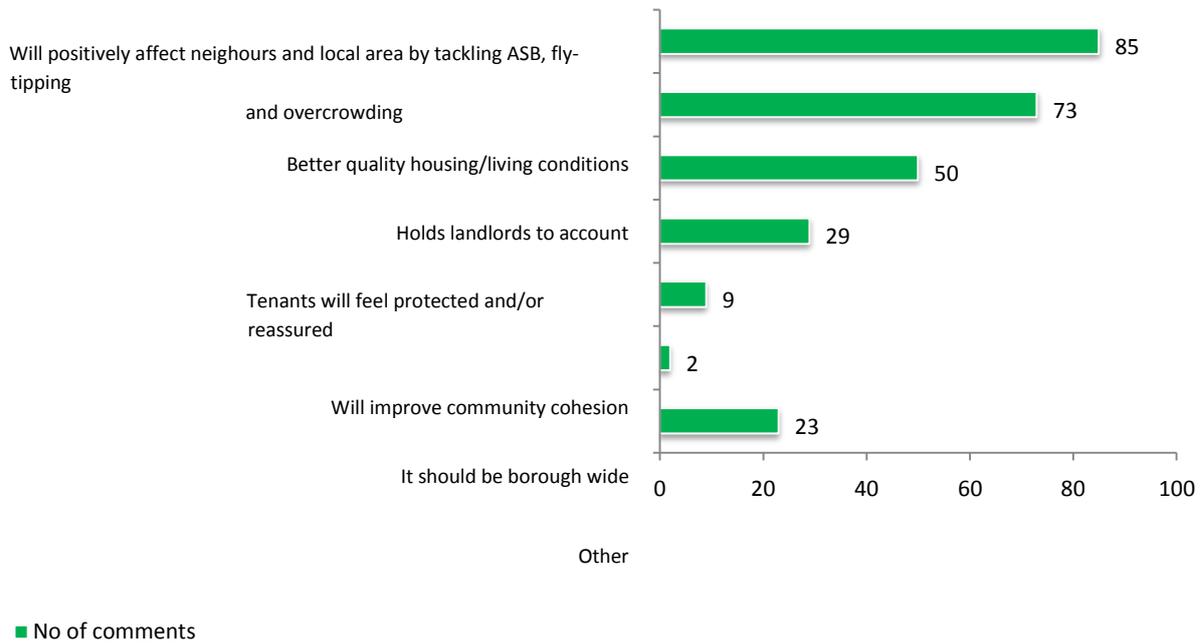
154 respondents provided comments on why they said that Selective Licensing will have a negative impact on them. Again, many referred to their previous comments for Additional Licensing. The most common reason is again that it is 'unfair and costly to landlords (especially small/good landlords)' (77 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

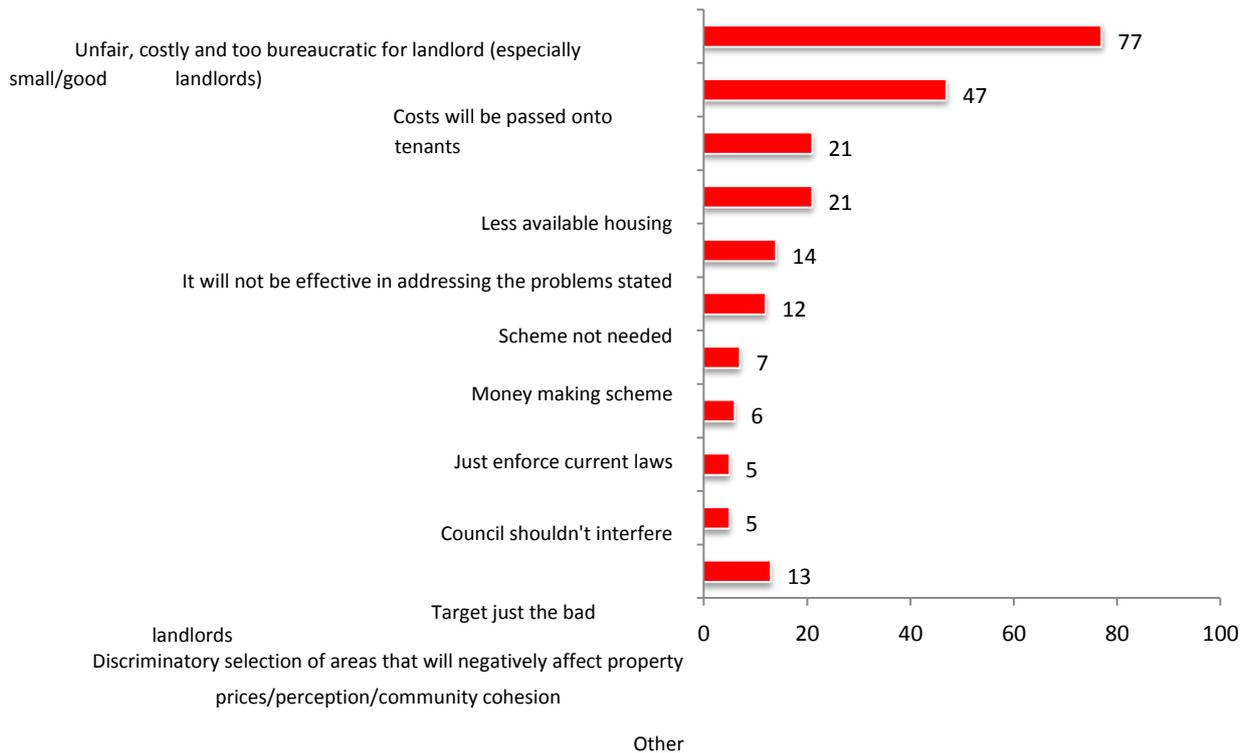
Finally, those who said that licensing will have no impact were asked to give reasons why (66 responses provided). Again, comments are often the same as those made to the question around Additional Licensing. The most common reason given is that it will have ‘no impact on me personally’ as they don’t 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

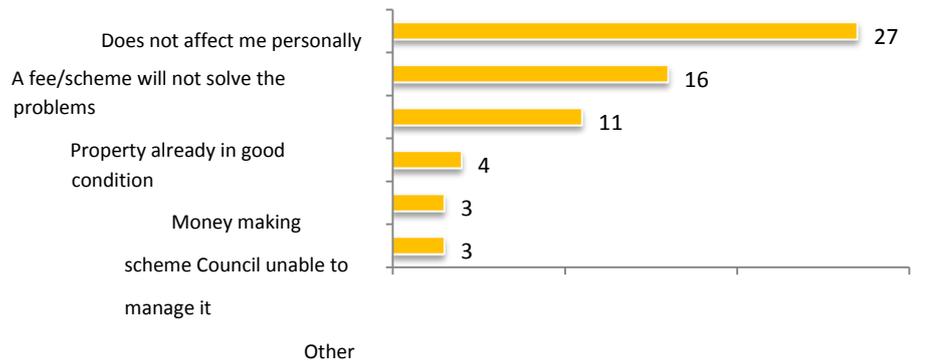


Negative impact



■ No of comments

No impact



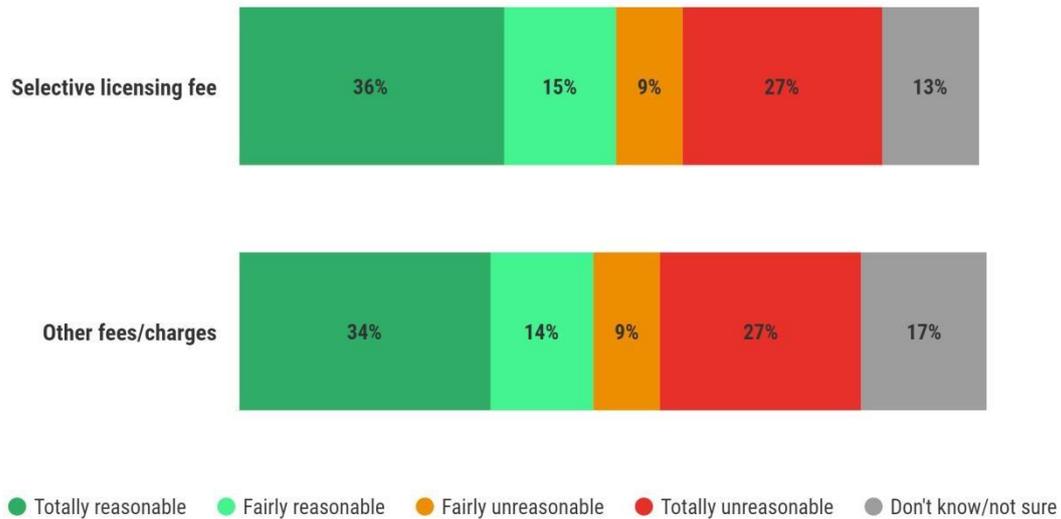
■ No of comments

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%).

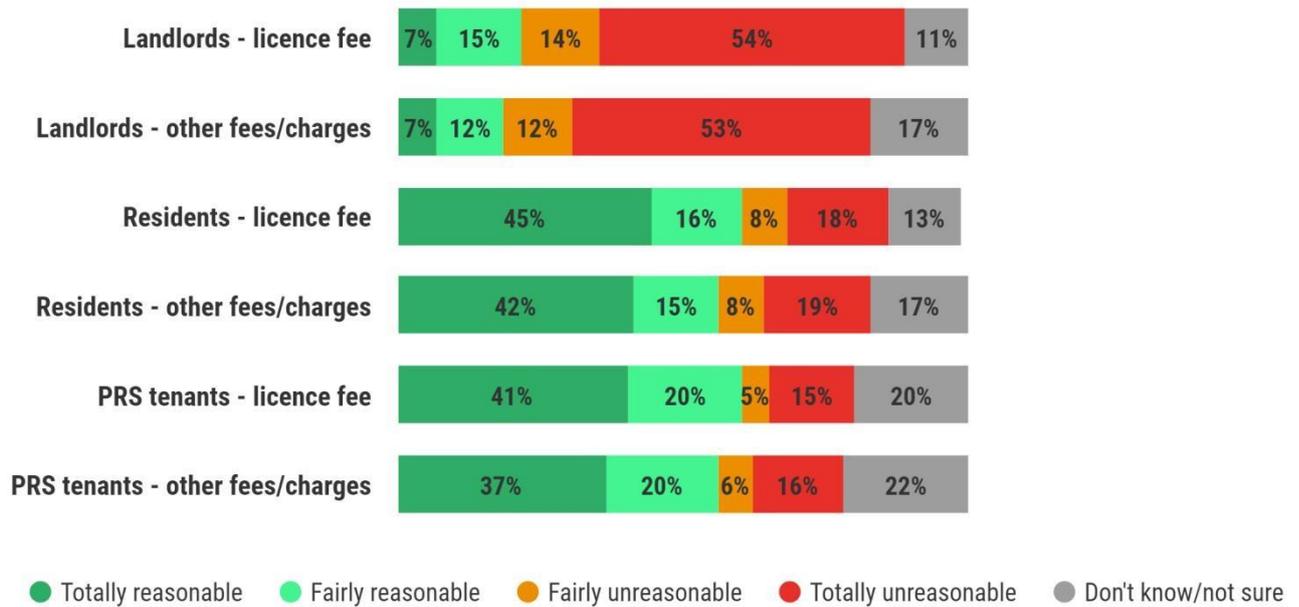
Figure 20: How reasonable is the proposed Selective Licensing fee and other fees/charges (overall)?



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).

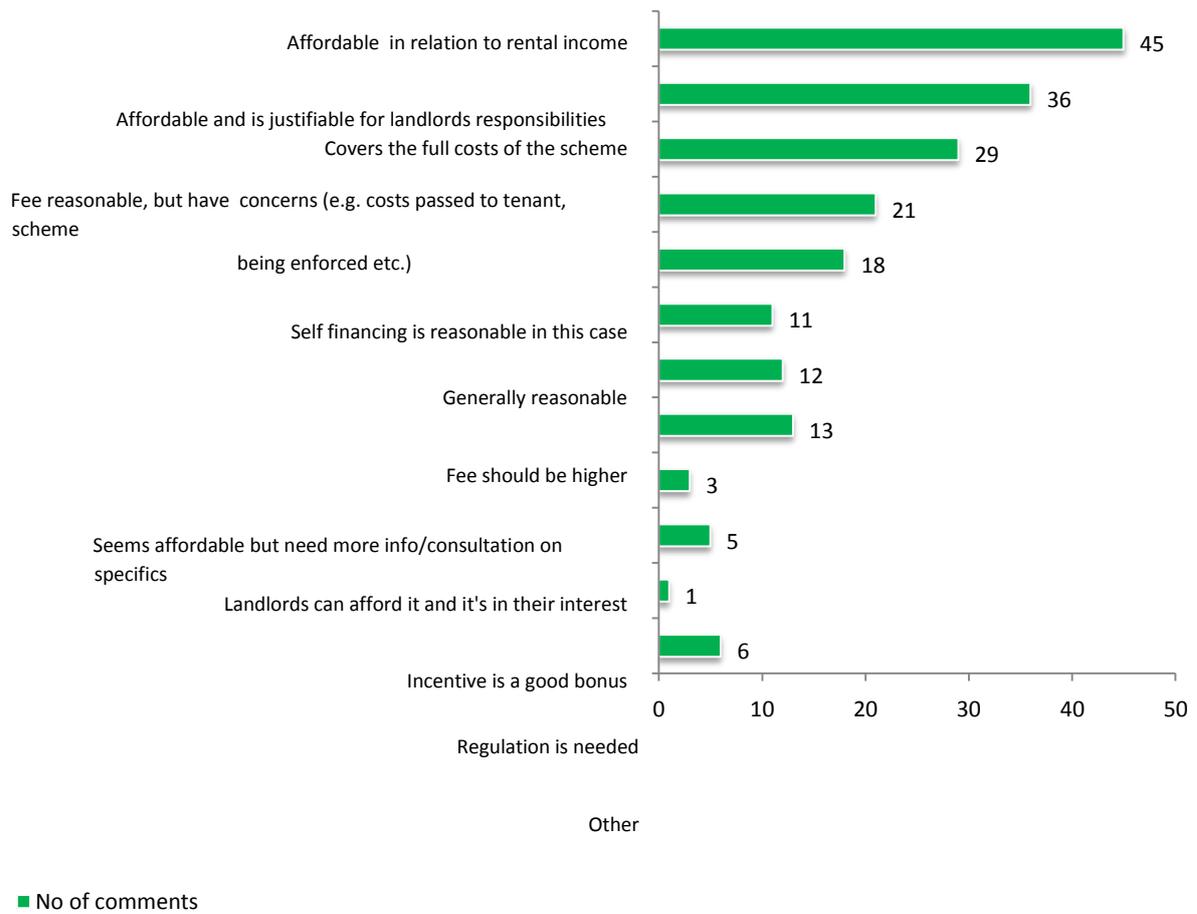
Reasons why Selective Licensing fees and other fees/charges are unreasonable

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).

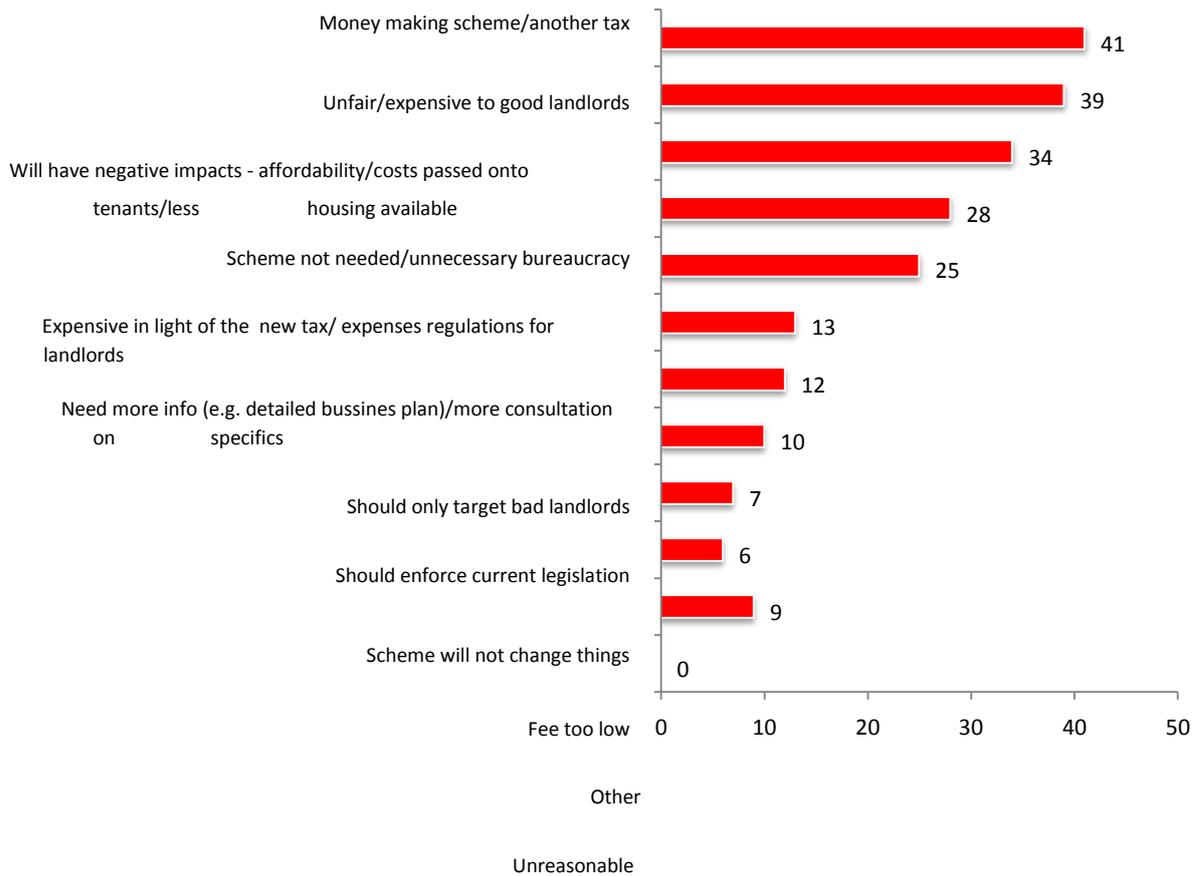
144 respondents said that the other fees/charges are unreasonable. The top reasons given are very similar to above: that the scheme is a 'money making scheme/another tax' (36 comments), that it will 'impact negatively on 'affordability for tenants/costs will be passed on/less housing available' (29 comments). 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



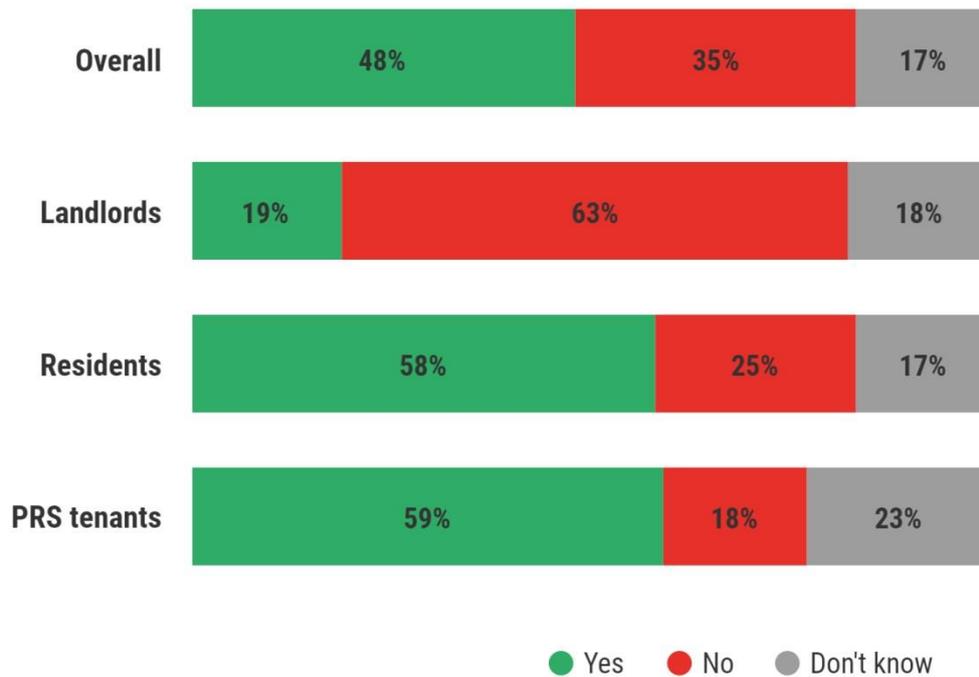
■ No of comments

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

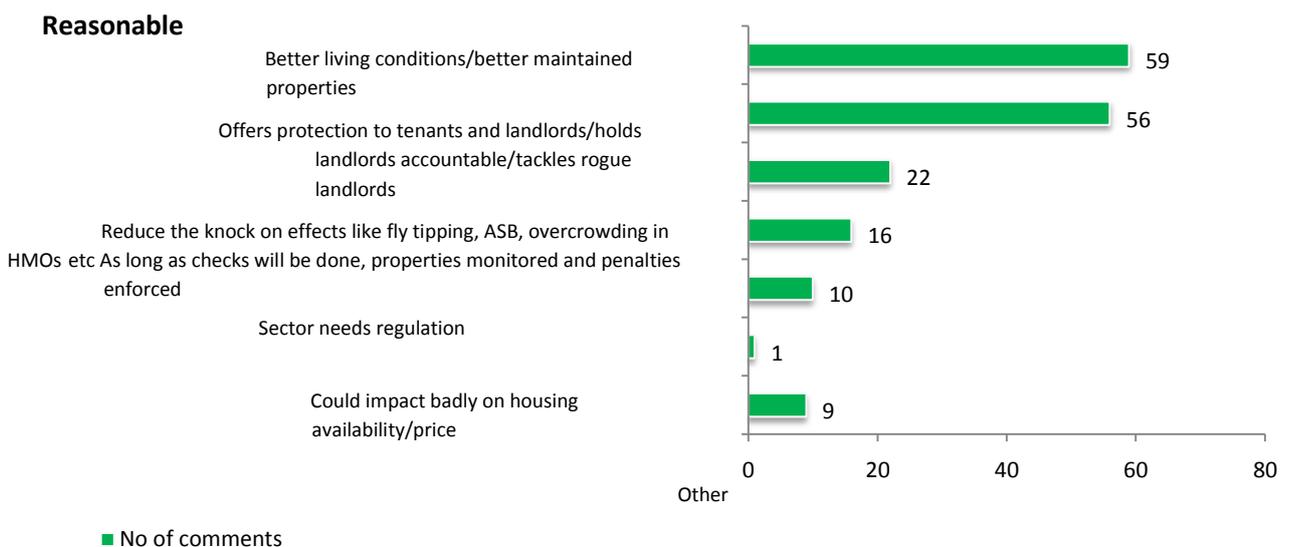
Reasons why Selective Licensing conditions are reasonable and will improve standards

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

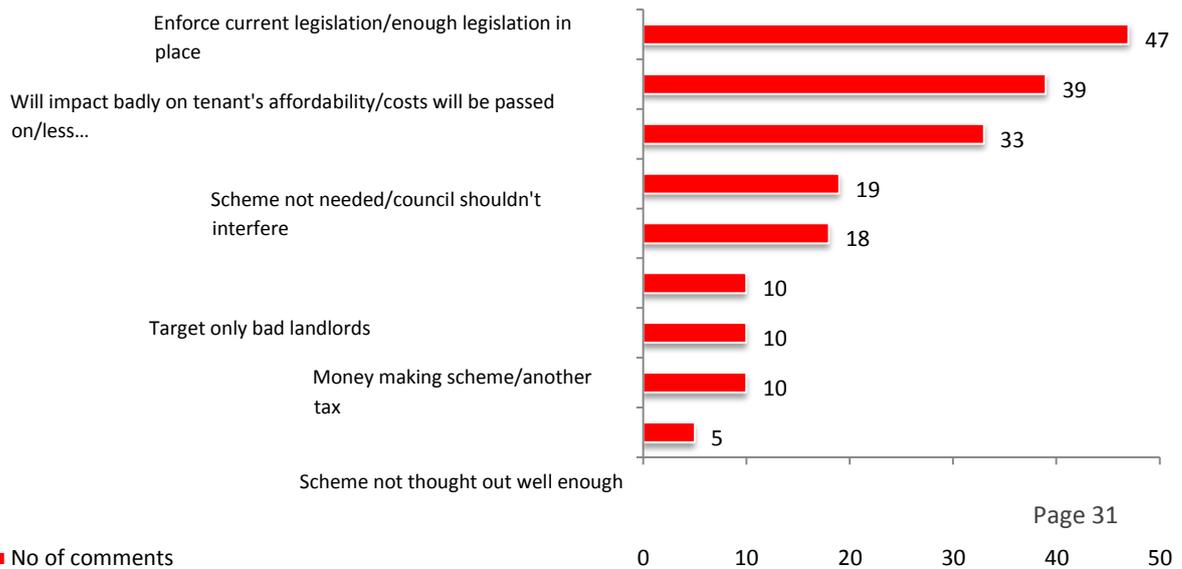
142 valid comments were given by those who said that the licensing conditions are unreasonable and will not improve standards of private rented housing. Again, many referred to their previous comments and the scheme in general rather than specifically about the conditions. The most common reason given 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)



Unreasonable

- Scheme will not change/improve things
- Unfair/unnecessary burden to good landlords



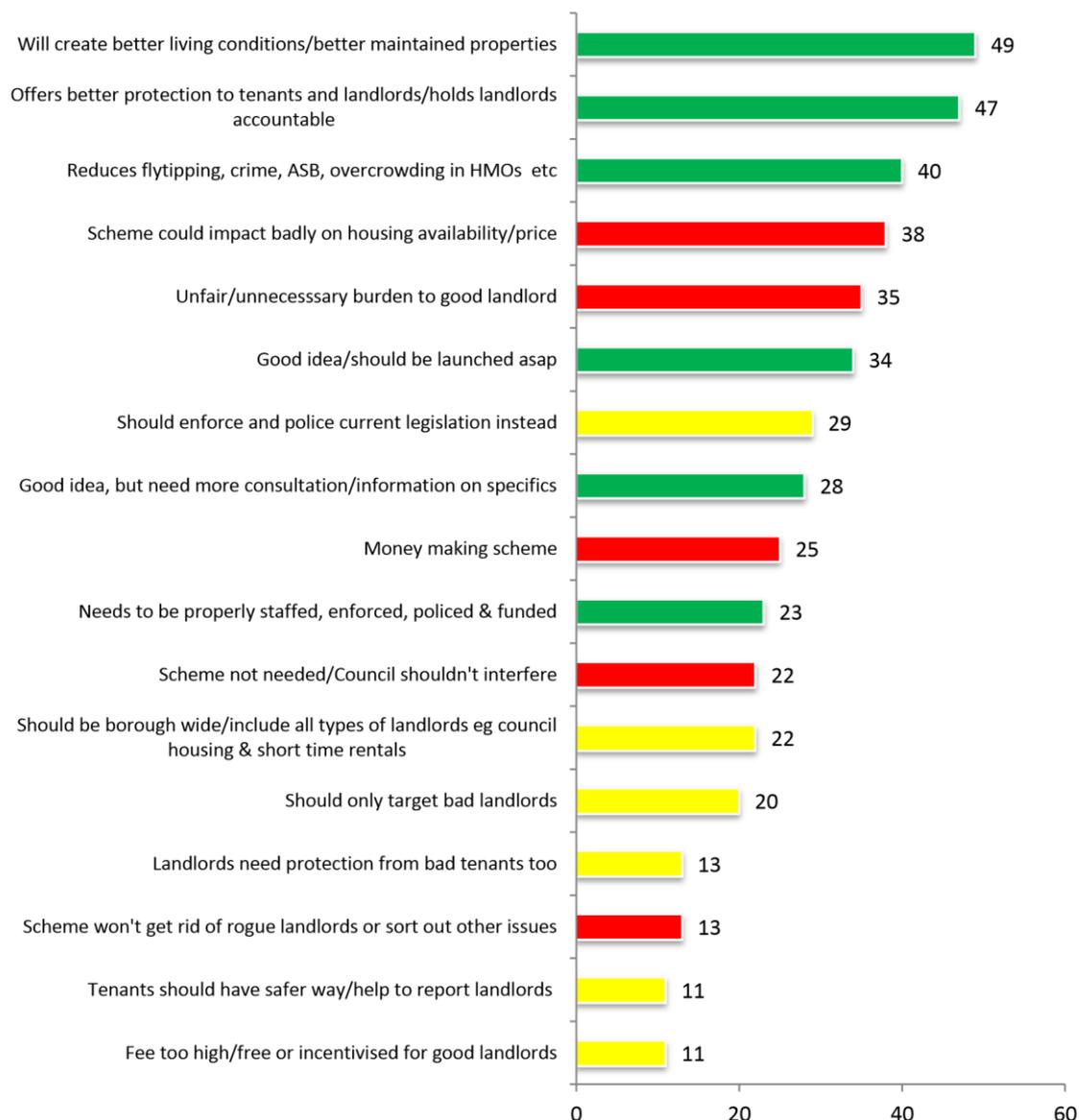
Any other suggestions/comments

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

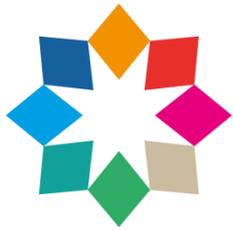
- Provide information to tenants about what a landlord should be doing, to put power in tenants' hands
- Do nothing, effectively leave for the market to resolve the problems; is this simply the council acting as a "nanny state", a local resident said
- Work involvement from councillors on the ground, 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)**



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