

London Borough Haringey. Selective Property Licensing

Appendix 1

Evidence Report



Proposed Selective Licensing Scheme

Evidence Report 2021

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1. Introduction

Haringey Council identifies the private rented sector (PRS) as having an important and long-term role in meeting the housing needs of the borough. Many households who would traditionally meet their housing needs in other sectors are now renting privately.

Haringey has seen a significant increase in its PRS, recent data modelling estimates that the borough has just under 44,000 privately rented dwellings. Alongside this growth, Haringey like many other urban boroughs has noted an increase in the prevalence of problems such as poor property conditions, poor landlord management, increased anti-social behaviour (ASB) and correlated deprivation in areas containing high concentrations of privately rented properties.

Haringey Council is focused on improving the management and maintenance of this sector to ensure residents, tenants and professional landlords are protected. Improving property conditions is one of the principal objectives. We are committed to reducing the level of hazards within our PRS dwellings so we can improve the level of decency for our tenants.

One of the key powers available to Council's to improve these practices is selective licensing. An option taken by an increasing number of authorities facing similar challenges to address problems associated with a large and growing PRS, especially in areas of low income and deprivation.

We want to work with landlords to address poor property conditions and help them to comply with our licensing conditions. We will continue to offer support on the professional management of properties through landlord's forums, the council website, in person or online. We will however follow the Council's enforcement policy to target those landlords who choose to flout the law and not comply.

Selective licensing was introduced in Part 3 of the Housing Act 2004. Part 3 of the Act allows local authorities to designate an area of their district as subject to selective licensing for up to five years. Such a designation requires all private rented properties within the area (excluding properties falling within certain exemption criteria) to be registered with the authority for an associated fee.

The council considers that a targeted selective property licensing scheme within the borough would assist the local authority in combating the growing issues that are being experienced in the PRS. The council has seen how licensing schemes can have an advantageous effect on the rented market, help drive up standards for tenants, make landlords and agents more accountable, tackle the minority of criminal landlords and help reduce the burden on council services.

Haringey Council has commissioned data driven research to identify and quantify the distribution PRS properties that exist within our borough, to establish where they are and how this sector impacts on the wider community. The research has been used to identify wards within the borough that are experiencing the most serious problems directly linked to private rented properties.

Haringey Council's preference would be to introduce a borough wide selective licensing scheme to ensure that housing standards across all PRS properties are raised and that all residents are protected. However, Government regulations and guidance for the introduction of selective licensing mandates that local authorities must meet strict criteria before an area can be lawfully introduced.

Based on the research the council has undertaken and our comprehension of the Selective Licensing of Houses Regulations Order 2015 and associated guidance, Haringey Council has decided to consult on a proposal to introduce selective licensing to private rented properties within the following 14 wards out of the borough 19 total wards, comprised of 2 separate designations, including.

- Northumberland Park
- White Hart lane
- Bruce Grove
- Seven Sisters
- Tottenham Hale
- Tottenham Green
- West Green
- St Anns
- Bounds Green
- Woodside
- Noel Park
- Harringay
- Hornsey
- Stroud Green

This consultation paper outlines our proposal, the reasons for the proposal and seeks to obtain your views on what we are suggesting.

Our proposal is still in the formative stages and we will listen carefully to the results of the consultation before deciding about how to proceed.

We look forward to hearing from you.

You can participate by.

Completing our online survey www.haringey.gov.uk/propertylicensingconsultation

Attending one of our workshops please email. haringeyprs@melresearch.co.uk

Anyone with a disability or who needs extra help completing a questionnaire can request support by calling freephone 0800 0730 348

A paper copy of the consultation is also available on request by emailing or by calling freephone 0800 0730 348 or by emailing haringeyprs@melresearch.co.uk

2. Proposed Selective Licensing Areas

It is our proposal to introduce selective licensing under the following statutory grounds; -

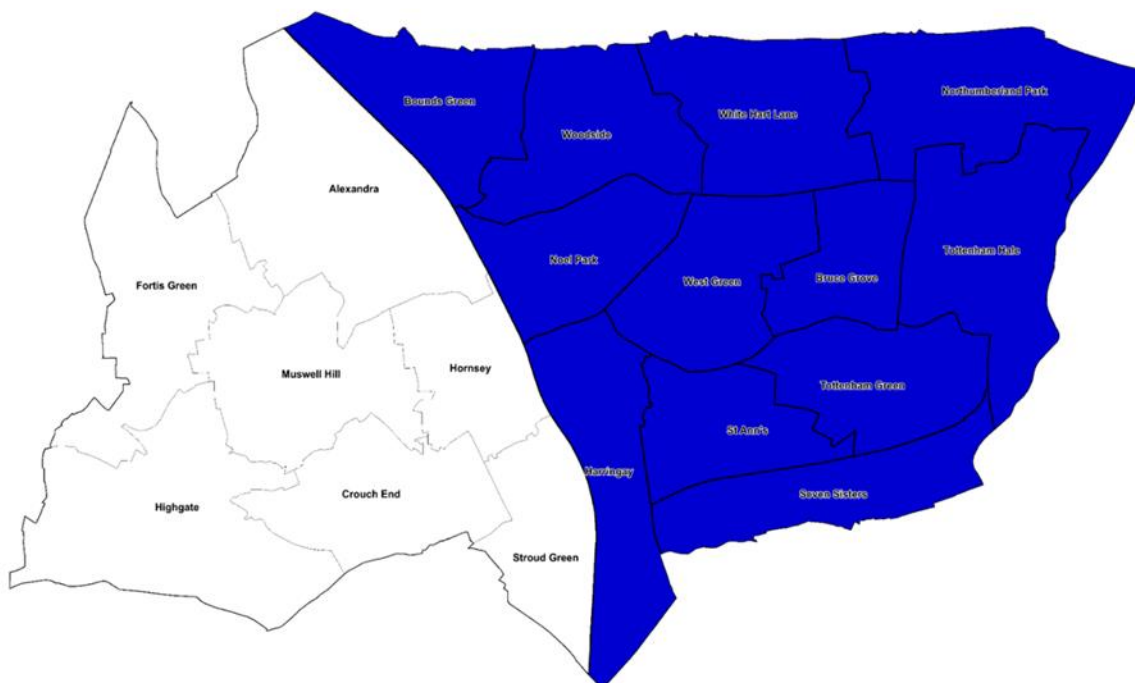
- A significant proportion of the stock is privately rented and that this stock is in:
 - Poor property condition
 - Suffers from Anti-Social Behaviour, all which is impacted by
 - High Levels of Deprivation.

The data shows that 14 wards out of the 19 wards in Haringey consistently meet the criteria for selective licensing in that:-

- They contain a high proportion of privately rented homes compared to the national average (19%)¹.
- Housing conditions within those wards are poor and the scheme through property inspections will allow the Council to improve this.
- The areas are experiencing a significant and persistent problem caused by anti-social behaviour, which private sector landlords are failing to address.
- The areas within the designation have the added factor of experiencing significant deprivation amongst its population.

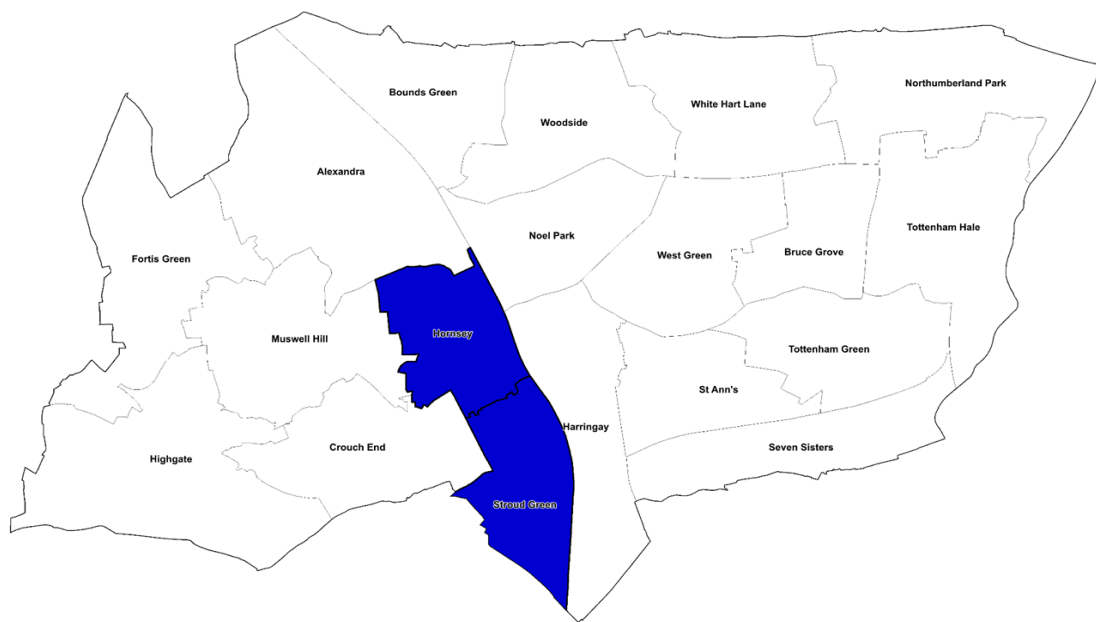
It is proposed that the Council introduces selective licensing within 14 wards in total. All wards will be subject to the same proposal however the wards will make up two designations based on the criteria above both of which will be considered on their own merits for the purposes of gaining secretary of State approval.

DESIGNATION 1 – 12 Wards



DESIGNATION 2 – 2 wards

¹ EHS Headline 2019-20, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf



3. Our Proposed Selective Licence Conditions

The selective licensing property Conditions proposed to be included in the scheme can be viewed in full on the Council website. Licence conditions can be Mandatory or Discretionary. The Mandatory conditions are required by law under the housing Act 2004 Schedule 4 and are not subject to consultation. The discretionary conditions do form part of our consultation and will be used to deal with property management and safety.

Please see Council website for full coverage of our proposed Licence conditions.

www.haringey.gov.uk/propertylicensingconsultation

4. Our Proposed Licensing Fee

The proposed selective licensing fee is £600. The fee will be split into two parts.

Part A of the fee is for the application for a licence and covers the cost of administration, processing, and validation of the application. If the licence is successful, a further fee, Part B will be charged before the Licence is issued. This fee covers the other costs incurred by the council under the licensing scheme. The fee split will be determined post consultation. A discount will also be given to Landlords and agents who are registered with a recognised accreditation scheme. This discount can only apply if the licence holder is the accredited member.

Please see Council website for full coverage of our proposed fee.

www.haringey.gov.uk/propertylicensingconsultation

5. Borough Profile

Population

The Borough has a population of 271,222 residents, Haringey has a young ethnically diverse population. 67% of the population are from BAME or other white ethnic groups. Over 180 languages are spoken in the borough, and 30% of residents have a language other than English as their first language. 36% of the borough's population is aged 18 or under; 13% is 65 or over. In terms of the borough's households, 32% are one person households, 16% are couples with dependent children and 11% are lone parents with dependent children.².Haringey the State of our Borough 2021

Housing & Homelessness

Haringey has the third highest rate of households in Temporary Accommodation in London, and the population outnumbers the availability of housing by approximately 12,000 people. Just more than 3,000 households in Haringey (25 per 1,000 households) are living in temporary accommodation (statutory homeless). This is the third highest rate in London, and despite decreasing, it is 80% higher than the London level (14 per 1,000).³.Haringey the state of our Borough 2021

Health

Life expectancy in the borough is in line with the London average, though there are stark differences among different groups, and between different parts of the borough. Healthy life expectancy is 15 years less in Northumberland Park, in the north-east of the borough, than it is in Highgate, in the west.⁴ Haringey the state of our Borough 2019

Impact of Covid19 & Health

Over 10,000 residents in NHS extremely vulnerable 'Shielded Group' in Haringey in 2021. Older people, BAME communities, people with disabilities, and people from disadvantaged socio-economic background have been more affected by the covid-19 virus in terms of illness and deaths. The local economy will be severely impacted in terms of (un)employment and business viability, and Poverty will increase, though the full extent of the increase is not yet known.⁵ Haringey the state of our Borough 2021

Deprivation

Haringey is a borough with high deprivation levels. It is the 4th most deprived borough in London, and 49th most deprived in England (of 317), when measured by Indices of Multiple Deprivation (IMD). This is particularly the case in the east of the borough.⁶The English Indices of Multiple Deprivation 2019.

Crime, antisocial behaviour, and environment

15% of Haringey residents feel unsafe in their local area after dark. Residents living in North Tottenham, West Green and Bruce Grove are most likely to say they feel unsafe, residents living in Crouch End and Muswell Hill are the least likely to say this. 33% of residents dislike the amount of litter in their local area, and 15% of resident's dislike that their area is dirty or run down.⁷ Haringey the state of our Borough 2019

Haringey is not unique in the challenges that face it, High crime, Anti-Social Behaviour, poor housing conditions and inequalities caused by high levels of deprivation are issues that the local authority is striving to tackle. As an authority we know we cannot achieve these outcomes in isolation and have the benefit of excellent partnering arrangements with the Police, Fire Services, Voluntary Sector

² Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

³ Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

⁴ Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁵ Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

⁶ The English Indices of Multiple Deprivation 2019. <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

⁷ Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

Organisation such as Bridge Renewal Trust and an ambitious Planning and Regeneration Directorate.

6. Evidence Summary

Residential Tenure

The private rental market is a growing sector within Haringey. In the 2011 census the private rented sector (PRS) in Haringey was listed as 32,095. Recent research (Metastreet 2019) has suggested that this figure has grown. Haringey PRS is now 43,775 dwellings, this is an increase of 36% from 2011 census.

Of the 108,915 residential dwellings (2019) in Haringey (Figure 1):

- Owner Occupation - 35,253 (32.4%),
- Social Housing - 29,887 (27.4%)
- Private Rented Sector - 43,775 (40.2%)

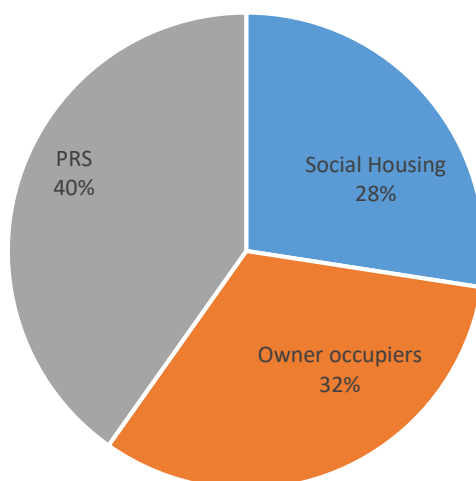


Figure 1. Tenure split as percent of total residential dwellings 2019

The median monthly private rent in Haringey is £1,500 (12 month rolling period to Q2 20-21). This was previously £70 less than the London average but is now £65 above it. The mean private rent is now £1,644 a week. Median private rent has increased by 17.4% in the last 4 years, a higher rate than local authority rents (5.5%) and London private rent (10.3%) ⁸ Haringey the state of our Borough 2021

Private Rented Sector

The evidence show Haringey has high level of renting across the borough. All wards in Haringey have above national average levels of private renting (19%⁹). The black horizontal line indicates the 19% threshold (Figure 2 & Map 1).

⁸ Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

⁹ The English Indices of Multiple Deprivation 2019. <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

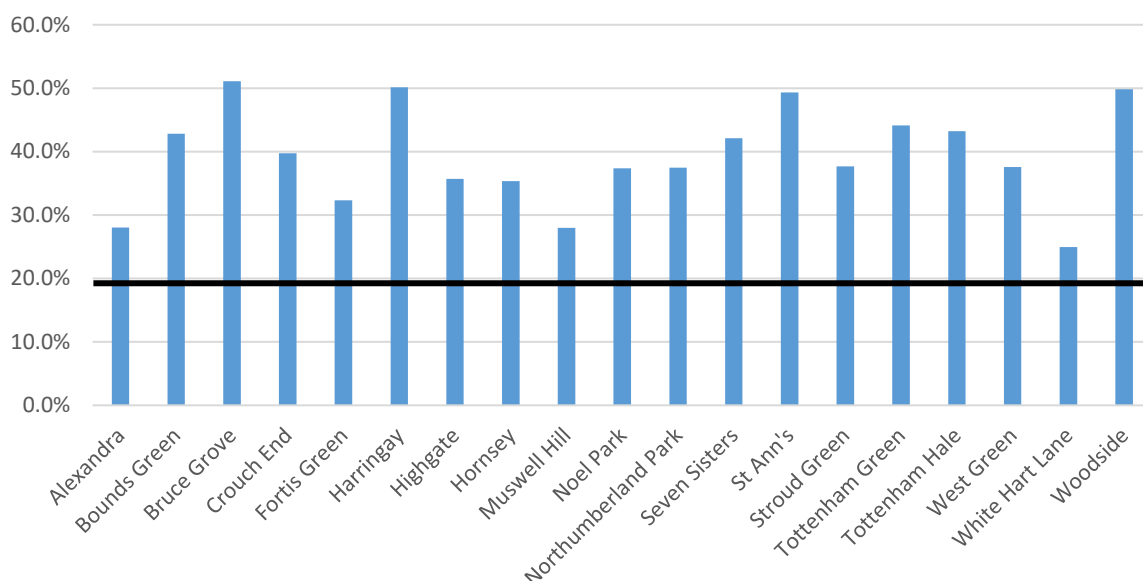
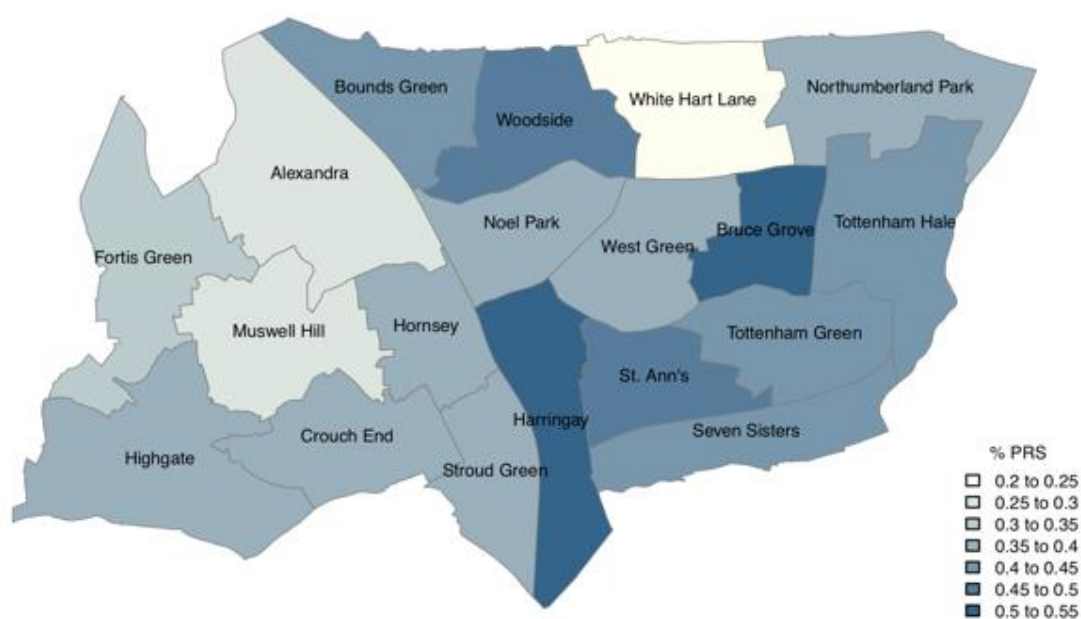


Figure 2. Percent PRS Map by ward



Poor housing condition

The Housing Health and Safety Rating System (HHSRS) is a risk-based assessment that the Council uses to identify hazards in privately rented dwellings. The most serious hazards are called Category 1 hazards and where these exist in a home, it fails to meet the statutory minimum standard for housing in England.

Figure 4 below show that Haringey is predicted to have 11,771 properties that are likely to have category 1 hazard, this equates to 27% of the privately rented dwellings within our borough. The national average which is 13 % as of 2020 .¹⁰

¹⁰ EHS Headline 2919-20, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

As you will see from the data below all wards in Haringey have property condition which is above the national average and therefore could be included within a proposed designation If the scheme were to be based on property condition alone.

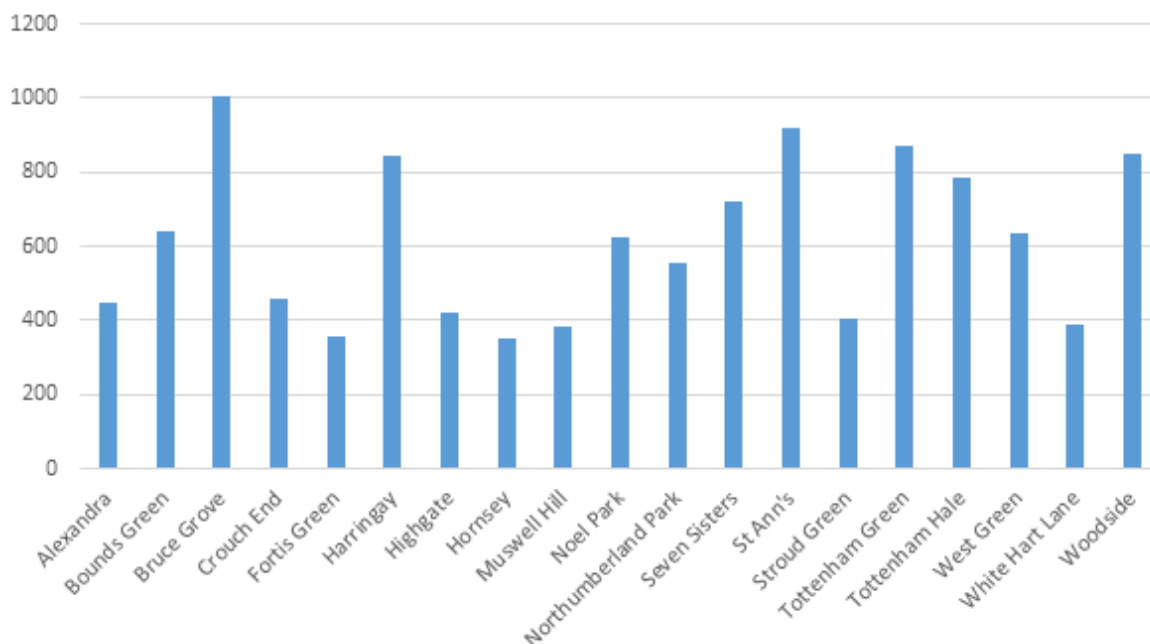


Figure 3. Predicted numbers of properties with at least 1 Category 1 hazard by ward.

PRS & Antisocial Behaviour

The Council is aware and appreciates that most landlords who let their properties do so responsibly, however poor property conditions and anti-social behaviour (ASB) including environmental ASB such as poor waste management or non-recycling of waste continue to be a problem.

Our borough continues to experience significant levels of ASB and property related ASB such as noise, poor waste management, littering and tenant behaviour. This chart below shows the incidents of ASB in relation to PRS dwellings in each ward.

Property related anti-social behaviour affects everyone including neighbouring residents and community stakeholders. Our waste partners report to us that privately rented homes are more likely to be responsible for poor waste management. Haringey spends more than £3 million a year dealing with fly- tipping - money that could be spent on other vital services.

Research show that significant level of ASB can be linked to the PRS (Figure 4) over a persistent period (5 years).

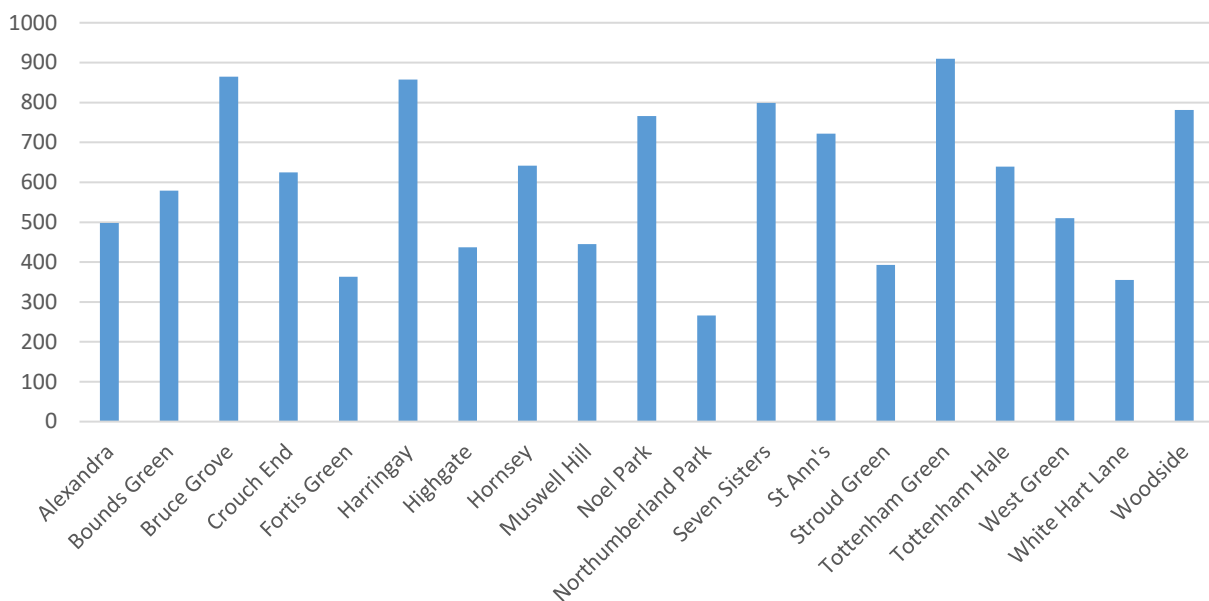


Figure 4. Number of ASB incidents linked to PRS properties by Ward (5 years)

Deprivation

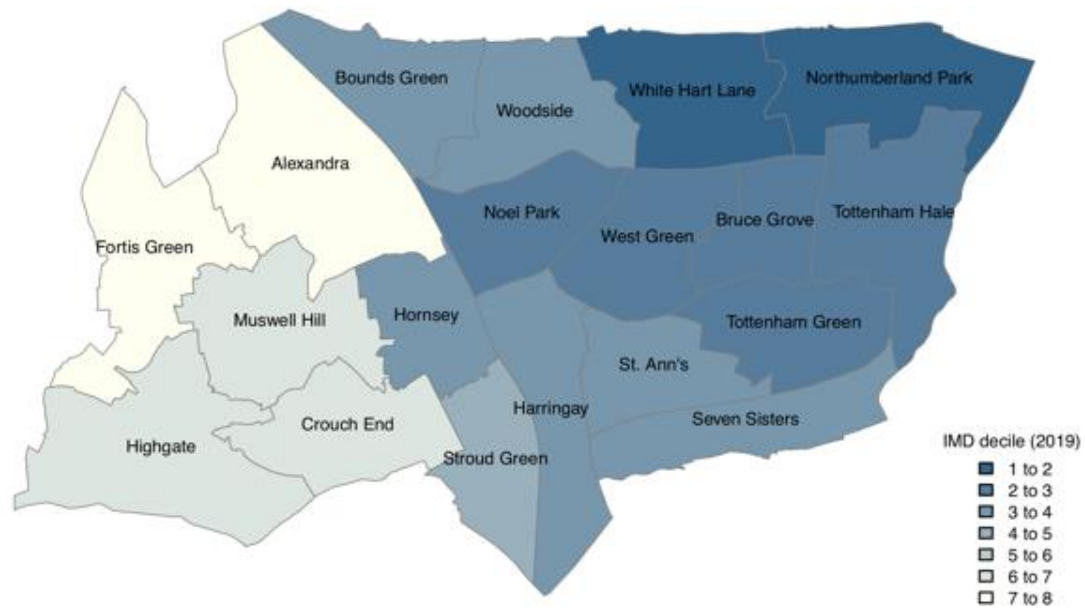
Deprivation is the consequence of a lack of income and other resources, which together can be seen as living in poverty. Deprivation can be measured and evidenced in various ways. The Indices of Multiple Deprivation 2019 (ID2019) are the Government's primary measure of deprivation for small areas (known as LSOAs) in England. The Index of Multiple Deprivation (IMD), combines measures across seven distinct aspects of deprivation: -

- Income,
- Employment,
- Education,
- Health,
- Crime,
- Barriers to Housing and Living environment.

Haringey is a borough with high deprivation levels. It is the 4th most deprived borough in London, and 49th most deprived in England (of 317), when measured by Indices of Multiple Deprivation (IMD). This is particularly the case in the east of the borough – over half of the Lower Super Output Areas (small areas that make up a ward), in the east are in the 20% most deprived in the country. By contrast, Highgate, Fortis Green, Muswell Hill, Alexandra and Crouch End wards have no Lower Super Output Areas in this category. ¹¹ The English Indices of Multiple Deprivation 2019.

The map below shows the wards which are the most deprived in Haringey. The darker the blue colour the more deprived the area.

¹¹ The English Indices of Multiple Deprivation 2019. <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>



Map 2. Distribution of deprivation (IMD 2019) by ward (Map by Metastreet)

The graph below (Figure 5) shows the levels of deprivation for each ward in Haringey. 1.0 on the graph represents the most deprived 10% areas in the borough, 5.0 represents 50% most deprived areas in the borough and so on.

The IMD data shows that Highgate, Crouch end, Muswell Hill, Fortis green and Alexandra wards are significantly above the national average.

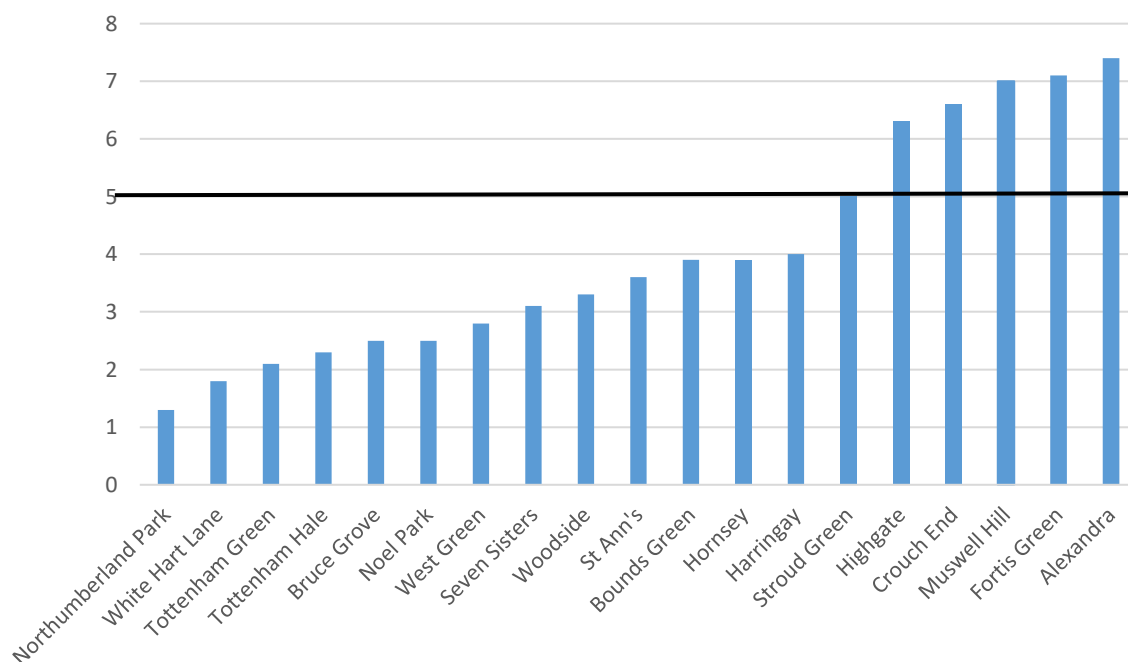


Figure 5. Distribution of Average IMD (2019) decile by ward (Source: ONS 2019) Black horizontal line is national average (5.0)

Why are some Wards are not being included in the selective licensing scheme?

The table below identifies by ward:

- Above 19% PRS stock
- Evidence of significant levels of poor property condition
- Significant and persistent levels of ASB
- Below average Indices of Multiple Deprivation ranking

Ward	% PRS	Poor Property Condition	Significant and Persistent ASB	IMD Ranking
Alexandra	✓	✓	✓	x
Bounds Green	✓	✓	✓	✓
Bruce Grove	✓	✓	✓	✓
Crouch End	✓	✓	✓	x
Fortis Green	✓	✓	✓	x
Harringay	✓	✓	✓	✓
Highgate	✓	✓	✓	x
Hornsey	✓	✓	✓	✓
Muswell Hill	✓	✓	✓	x
Noel Park	✓	✓	✓	✓
Northumberland Park	✓	✓	✓	✓
Seven Sisters	✓	✓	✓	✓
St Ann's	✓	✓	✓	✓
Stroud Green	✓	✓	✓	✓
Tottenham Green	✓	✓	✓	✓
Tottenham Hale	50%	✓	✓	✓
West Green	44%	✓	✓	✓
White Hart Lane	50%	✓	✓	✓
Woodside	51%	✓	✓	✓

The wards highlighted in orange are those wards which meet some of the qualifying criteria but not all. We have considered the impact that deprivation has on inequality and the ability to achieve change in areas where there are existing factors such as, socio and economic influences contributing to a wider housing problem. We have therefore used this data to highlight those areas of the borough where we feel there is the greatest level of need and where we are likely to have the greatest impact based on our limited resources.

Through this consideration we are of the opinion that the 5 wards which are above the 5.0 decile could not be justifiably at this time. The five wards which have not been included in our proposal are:

- Alexandra
- Muswell Hill
- Fortis Green
- Highgate
- Crouch End

We will continue to keep these wards under review and seek to introduce selective licensing if the evidence suggest they would qualify for selective licensing. Moreover, we will continue to use our existing powers and other alternative options to deal with the issues of poor property conditions and property related ASB within these wards to ensure that those tenants and residents experiencing these issues also receive a service. These actions will be reactive and based on complaints from tenants and the public. They will be dealt with using our existing procedures and any landlord failing to comply will be subject to the Council existing enforcement policy.

7. What is Property Licensing?

Under the Housing Act 2004, there are three forms of licensing relating to private sector housing available to local authorities.

- Mandatory Licensing of certain HMOs
- Additional Licensing – HMO's
- Selective Licensing – Any other private rented dwelling

All licensing schemes are intended to address the impact of poor-quality housing, rogue landlords and anti-social tenants. In an area subject to licensing, all private landlords must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action.

Licensing Statutory Provisions

A licensing scheme designation lasts for five years from the date the designation becomes operational. A scheme may be renewed following the appropriate legal authorisations.

Property Licensing denotes through a prescribed process how a property should be controlled and managed. This is monitored through the property licence by Council Officers.

Subject to limited exemptions, a valid licence must be held by the appropriate responsible person, typically the landlord or managing agent in respect of all privately rented properties in such a designated area.

A licence holder must be fit and proper, the property must meet all legal standards, be in good condition and managed effectively.

All of these requirements are stipulated as 'conditions' of holding a property licence. It is an offence for a licence holder to fail to comply with any of the licence conditions throughout the licence period. Failure to licence or comply with licence conditions can result in Civil Penalty enforcement or prosecution.

The legislation allows Local Authorities to set and charge an appropriate fee to Licence applicants. The fee must be reasonable and reflective of the scheme in operation. Following recent case law, the fee is now required to be paid in two parts. Part A, which covers the processing of the application and the remainder, Part B, which can support the associated costs of compliance with the Licensing Conditions. All selective licence fee income is ring fenced for the administrative and operational cost of operating the licensing scheme.

Selective Property Licensing

Selective Licensing is an additional tool that local authorities can seek approval to use alongside their normal enforcement powers in order to target specific issues that are affecting the local authority and its community.

Selective licensing would allow the local authority to regulate landlords to manage this sector more effectively. There are several factors through which selective licensing helps to achieve effective change:

- It focuses resources on areas of concern whilst simultaneously generating revenue to contribute to the costs involved.
- It provides clearly defined offences (licensed/unlicensed) which simplifies enforcement - and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences.
- There is no 24-hour notice requirement for access before an inspection for licensing purposes. This is particularly important where criminal ('rogue') landlords are present.
- The proactive inspection approach frequently brings other problems to light.
- Licensing provides a clear driver for effective engagement between landlords and local authorities and drives up landlord awareness of their responsibilities.
- The pre-designation process focuses local authority minds on the development of clear, transparent and robust enforcement practices.
- Selective licensing encourages the development of effective intelligence-gathering mechanisms to support compliance by identifying unlicensed properties and then targeting those problematic properties.
- Promotion of joint working within the authority and other agencies - fire and rescue service, police, border control/immigration, social services, HMRC etc.

Making a Designation

A local housing authority may only make a designation if the area to be considered has a high proportion of property in the PRS. In England this is 19% of the total housing stock.

In addition to the above for selective licensing to be considered, one or more of the following six statutory grounds must be met:

- i. Is an area of low housing demand (or is likely to become such an area)?
- ii. Is experiencing a significant and persistent problem caused by anti-social behaviour and that some or all the private landlords letting premises in the area are failing to take appropriate action to combat that problem.
- iii. Is experiencing poor property conditions in the privately rented sector.
- iv. Is experiencing or has recently experienced an influx of migration and the migrants occupy a significant number of properties in the privately rented sector.
- v. Is suffering high levels of deprivation affecting those in the privately rented sector.
- vi. Is suffering high levels of crime affecting those in the privately rented sector.

The Housing Act 2004 also requires the local authority to demonstrate the following outcomes as part of its process of delivering a selective licensing initiative.

- Ensure that the exercise of the power is consistent with their overall Housing Strategy.
- Adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behaviour affecting the PRS as regards combining licensing with other action taken by them or others.
- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of achieving the objectives that the designation would be intended to achieve.
- Consider that the making of the designation when combined with other measures taken by the authority alone or with other persons will significantly assist them to resolve the problem identified (whether or not they take any other course of action as well).
- Take reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made.

Where the proposed designation covers either 20% of the total geographic area of the authority or 20% of the total privately rented stock (based on census figures), the designation requires approval by the Ministry for Communities and Local Government (MCHLG).

Selective Licensing applications to the MCHLG require local authorities to first demonstrate the evidence for their concerns as well as look at alternative approaches and consult widely.

Our proposal due to the size of the area to be designated in terms of geography and the size of the private rented stock to be included, will require the approval of Secretary of State.

Property to be included in our scheme

The type of property that will be subject to selective licensing will be any privately rented dwelling that contains a single household. A single household can be defined as the following:

- a family, e.g., a couple (whether married or not and including same-sex couples) or
- persons related to one another.
- an employer and certain specified domestic employees, a carer and the person receiving care, a foster parent and foster child.

Exemptions from Selective Licensing

There are a number of exemptions to selective licensing scheme including:

- a) properties licensable as an HMOs under mandatory or the proposed additional HMO licensing.
- b) properties let by a local authority or a Registered Provider (RP), traditionally known as a not-for-profit Housing Association.
- c) properties already subject to a management order.
- d) properties subject to a temporary exemption notice.

- e) owners who reside in property they own as their main residence (owner occupiers).
- f) holiday lets; and tenancies under a long lease and business tenancies.
- g) Any building which is occupied principally for the purposes of a religious community whose principal occupation is prayer, contemplation, education or the relief of suffering.
- h) Student accommodation directly managed by educational institutions, e.g., halls of residence.
- i) properties managed by a charity registered under the Charities Act 2011 and which—
 - a. is a night shelter, or
 - b. consists of temporary accommodation for persons suffering or recovering from drug or alcohol abuse or a mental disorder.

8. What we want to Achieve

Our selective licensing scheme aims to compliment the wider work of our borough wide HMO licensing Scheme, so that any privately rented property within the approved designation/s regardless of its status will need to be licensed with the Local Authority and comply with the Councils Licensing condition's.

Ultimately Improving property conditions and making landlords more accountable for the behaviour of their tenants is the overall objectives of this scheme.

The scheme is not in a position to alter the deprivation status of the wards identified within a designation, but we do aim to improve the barriers for those residents living in the PRS facing inequality. Strategic partnerships and involving the Council's wider Connected Communities service will hopefully enable us to identify residents in need and assist them in accessing other council services that can help improves their lives.

Improving property conditions, management and driving up standards in our PRS will contribute towards building stronger, safer more sustainable communities in Haringey. Communities which can contribute positively to Haringey and the local community is something we are committed to achieving.

The objectives of our proposed schemes are summarised in the delivery plan below.

OBJECTIVE	OUTCOME	ACHIEVEMENT
Improve Property Condition of all single family private rented accommodation.	Reduce the number of Housing hazards	How many properties will have improved conditions through our actions.
Improve the management standards of all single family private rented accommodation	Improve compliance through licensing of property standards.	Ensure that all licensable properties are licensed to ensure they know the licensing conditions that apply to them.

		Undertake targeted compliance checks in respect of property licensed under the selective licensing scheme.
Reduce the levels of ASB from privately rented single family dwellings.	Reduce repeat ASB incidence in licensed premises by 10% over the lifetime of the scheme	Collaborative working with frontline workers dealing with poor waste management to prevent missed collections and waste contamination and fly tipping. Document checks to ensure landlords are complying with ASB conditions.
Assist private sector tenants living in areas of deprivation to access Council & Voluntary services.	Ensure that Tenant engagement is a key part of the scheme.	Officers provide tenants with information and sign posting to support their housing and wider needs. Councils, services, connected communities and the Voluntary sector are aware of the scheme and know how to sign post people.

9. Alternative options

We have considered several other courses of action or alternative approaches to selective licensing. We do not believe however that either individually or collectively they would prove effective, or be as an effective means of tackling poor housing conditions and ASB in the borough. None of the options can deliver the scale of improvement that we believe is required in the PRS. Below outlines the alternative approaches that we have considered and explains why they are not sufficient to meet our objectives.

Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers

- Formal notices can be served that require improvements to be carried out. Councils can carry out work in default if a notice is not complied with. Landlords also risk being prosecuted if they do not comply with the notice.
- Formal action is generally a slow process with appeal provisions against most types of notices served, which can significantly delay the time for compliance. These powers do not place any obligation on landlords to be *proactive* in improving conditions. Work in default can be effective but is expensive and time consuming for the Council, with the risk that not all costs are recovered. Successful prosecutions do not themselves secure improvements in property conditions and the Council's prosecution costs are often not met in full. Further, the Council's powers under Part 1 do not enable it to regulate the management of the property.

Voluntary Accreditation schemes to facilitate improvement in property conditions and Management standards

- For those landlords who take part, accreditation can improve the ability to effectively manage a property.
- This requires voluntary landlord engagement. Rogue landlords are unlikely to attend/engage in these initiatives. We have tried such schemes through registration and training in the past and they have been resource intensive, take up has been poor and they are difficult to manage.

Depend on existing Enforcement Powers and Tools

- This relies on reactive responses to complaints.
- Resource intensive, it doesn't provide any incentive to landlords to improve their property and the outcome can be lengthy and costly process.

Better use of ASB powers and joining up with ASB enforcement officers

- Formal notices can be used to address ASB identified by officers on an individual level. If complied with they can resolve an issue and are often issued as a financial penalty.
- Rely heavily on another council service proactively and or reactively identifying perpetrators and evidence gathering. Notices are often not targeted at a landlord but the tenant which doesn't put any responsibility on the landlord to manage their properties or prevent re-occurrence. It is also resource intensive.

10. Licensing and our wider borough strategies

Haringey's Borough Plan

Haringey adopted a new Borough Plan in 2019 to set the Council's priorities over the 4-year period to 2023. The Borough Plan is centred around five key priorities:

- Housing,
- People,
- Place,
- Economy and
- Your Council.

Licensing the PRS clearly relates to Housing. The Housing Priority's overarching objective is for 'a safe, stable, and affordable home for everyone, whatever their circumstances'. The Borough Plan commits to 'working together to drive up the quality of housing for everyone' and specifically to 'Improve the quality of private rented housing and the experience of those living it, including by expanding landlord licensing and associated enforcement'. The Borough Plan commits to the Council introducing selective licensing for non-HMO homes in the borough.

It is important to note that the benefits that the Council expects to stem from the introduction of selective licensing will also help meet other priorities expressed in the Borough Plan. By reducing anti-social behaviour and creating more attractive streetscapes, it will contribute to making Haringey a safer, cleaner, and more attractive borough – as expressed in the Place Priority. And ensuring that homes are safe, warm and in good condition will help Haringey's residents, young and old, live more fulfilled, happy and healthy lives – objectives of the People Priority.

The Borough Plan also commits to the principles of equality of opportunity, fairness, and quality of life for all. Ensuring that more private landlords are licensed helps promote fairness across housing tenures in the borough and narrows the gap in quality of life that may exist between, and within, different housing tenures.

[Haringey's Housing Strategy](#)

Haringey's current Housing Strategy 2017-2022 also commits the Council to improving conditions in the PRS, stating that 'we will use our statutory powers to drive up quality in the PRS, whether selective, additional or mandatory licensing or other enforcement powers'. And a focus on, and commitments to, private renters will continue to be a focus in the new housing strategy currently under development.

Our new Housing Strategy will outline the role of the Private Housing Sector

At a regional level, the Mayor of London's Housing Strategy includes a strong focus on the PRS, and on councils' powers to improve the experience of private renters. Specifically, 'The Mayor wants councils to have the tools and resources they need so that private renters can expect consistently decent standards. He wants better regulation through property licensing and landlord registration... He will also support councils to run well-designed property licensing schemes. Haringey's proposed selective licensing scheme and its place within a range of complementary enforcement powers has been developed through close engagement with the GLA and neighbouring boroughs on good practice in improving the PRS.

[Connected Communities](#)

Haringey's pioneering integration programme, Connected Communities, began in September 2018. Connected Communities is a programme set up to improve access to council and voluntary services and support in Haringey to encourage residents to live their version of a good life. Connected Communities can provide anyone in the borough support with:

- Housing
- Benefits and financial advice
- Council Tax
- Employment
- English lessons (Adult learning)
- Parenting and childcare
- Linking in with community activities
- Applying for the EU settlement Scheme
- Anything else!

We have four Housing Connected Community officers who work alongside our Private Sector Housing Officers, to provide support to tenants who are finding their housing situation challenging. Whether that be sustaining a tenancy due to personal issues, not having financial means, harassment from landlord or other tenants or they are experiencing other influencing factors. This partnership arrangement allows PRS officers to focus on improving standards while the tenants' wider needs are addressed.

[Haringey's Homelessness Strategy](#)

Haringey's Homelessness strategy 2018-2021 is up for review but the guiding principle within this strategy is around prevention. The best way to prevent homelessness is to prevent it happening in the first place. The aim of achieving this was for all members of our partnership including homeless people themselves to play a role and take responsibility for this. New ways of integrating

homelessness prevention work with other services who meet people in housing need or who are at risk, enables the council to intervene early and more effectively.

Private Sector Housing is a partner service that plays an integral role in prevention of homelessness. We will continue to work collaboratively with our housing need partners to prevent tenants in the private sector from becoming homeless. Through our Connected Community Housing Officer and the Private Sector Housing Enforcement Officers we aim to intervene early, work with landlords and agents to resolve any issues and to sustain tenancies when and where we can.

[Haringey's Empty Homes Policy](#)

The Council revised its empty homes policy in July 2020. The new document sets out the key priorities and issues concerning empty homes in the borough. It provides a coordinated approach for the Council to adopt and a framework for Council officers to follow, it ensures our residents and stakeholders are clear on our policy and the actions we can take, and how residents can access our services. The Policy aims to target those homes which have been left empty the longest, which blight communities, attract Anti-social Behaviour and or crime. The policy reinforces our use of powers and when and how these will be used. As part of our Licensing programmes empty homes in our borough will be targeted within the designations to ensure a co-ordinated approach to improving communities.

[Community Safety Strategy \(2019-2023\)](#)

The Community Safety Strategy presents the Haringey Community Safety Partnership's approach and priorities to achieving a reduction in crime and anti-social behaviour in Haringey up to 2023.

The strategy is supported by a comprehensive strategic assessment that draws on data from across the partnership to identify trends, patterns, and drivers relating to crime and anti-social behaviour.

The strategy is informed by extensive consultation and engagement with partners across the system, with community groups, and with Haringey residents and businesses. The outcomes that the Community Safety Partnership seeks to achieve through the strategy are a reflection both of the data and what we have heard through this engagement activity.

The Community Safety Strategy aims to improve the quality of life in the borough by focussing partnership action on six outcome areas:

- Violence and high harm crimes
- Violence against women and girls
- Exploitation (including child sexual exploitation, child criminal exploitation, County Lines, trafficking, extremism, and modern slavery)
- Public confidence
- Victims of crime and anti-social behaviour
- Reoffending

A Community Safety Action Plan sets out the specific actions that community safety partners will take forward to address the issues identified in the strategy corresponding to the six outcome areas.

[11. Housing Stock Research Methodology](#)

The council have commissioned residential stock-modelling in 2019. The approach is based on council and open source data in combination with machine learning to provide insights about the prevalence and distribution of housing tenure and a range of housing factors.

Metastreet's Tenure Intelligence (Ti) has been used by a number of authorities to understand their housing stock and relationships with key social, environmental and economic stressors, including Waltham Forrest, Enfield, Croydon, Oxford, Liverpool and Southwark.

To ensure that Haringey Council could have confidence in the results of the study a validation process was undertaken. Predictions provided in 2019 for every property in the borough were matched to PRS tenant service requests received by the council after the study had completed. These randomly selected addresses were used to validate the predictive accuracy of the Metastreet model. Of the 330 PRS tenant service requests used as part of the validation test, Metastreet Tenure Intelligence predicted 86% correctly.

The housing models are developed using unique property reference numbers (UPRN) as keys, which provide detailed analysis at the property level. Data records used to form the foundation of this data include:

- Council tax
- Housing benefit
- Electoral register
- Private housing complaints and interventions records
- Other council interventions records
- ASB complaints and interventions records
- Experian Mosaic records & Energy Performance data

12. For Further information and details of the consultation

Supporting documentation can be found at www.haringey.gov.uk/propertylicensingconsultation

The Council welcomes view from all Haringey residents especially private tenants, landlords, letting agents with property in the borough and anyone or any organisation with an interest in the PRS. Our consultation is being run by M·E·L Research, an independent research company.

You can participate by.

Completing our online survey www.haringey.gov.uk/propertylicensingconsultation

Attending one of our workshops please email. haringeyprs@melresearch.co.uk

Anyone with a disability or who needs extra help completing a questionnaire can request support by calling freephone 0800 0730 348 A paper copy of the consultation is also available on request by emailing or by calling freephone 0800 0730 348 or by emailing haringeyprs@melresearch.co.uk

