

# London Borough Haringey. Selective Property Licensing

Appendix 3

Consultation Analysis & Outcome Report



Consultation on selective licensing of private rented property in Haringey

**Haringey Council** 

**December 2021** 



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# **Project details and acknowledgements**

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Project number	20172
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This project has been delivered to ISO 9001:2015, 20252:2019 and 27001:2013 standards.



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# **Executive summary**

This report presents the findings of the public consultation on Haringey Council's proposals to introduce a targeted selective licensing scheme in Haringey to tackle the growing issues that are being experienced in its private rented sector (PRS) and allow the Borough to manage the sector more effectively by regulating landlords.

The Council proposed to introduce the scheme within 14 wards out of the borough's total 19 wards, comprised of two separate designations, to address the specific problems faced within each designation area.

The consultation ran for 16 weeks from 17<sup>th</sup> May to 5<sup>th</sup> September 2021 and sought to gather local views on the proposals, including the proposed licensing conditions, fees, and alternatives that the Council could consider. The Council commissioned M·E·L Research, an independent research company, to deliver the consultation survey and independently analyse and interpret the results.

The consultation also looked at respondents' experiences of issues in the borough around property conditions, deprivation, and anti-social behaviour.

A variety of consultation methods were used to allow interested parties to share their views on the proposals and adaptations were made in light of the ongoing COVID-19 pandemic. These methods included an online survey, a postal survey, remote public workshops, stakeholder interviews, a freephone number for verbal feedback, and an email address for written feedback and queries.

The Council promoted the consultation extensively through various communication channels, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops. Seven stakeholders were interviewed. Finally, 36 individuals or organisations responded with formal written submissions to the consultation.

## **Key findings**

## 1. Selective Licensing scheme

Table 1: Summary of online and postal survey responses on proposal (overall/by respondent group)

	Overall	Residents	Landlords / agents	Private tenants	All other respondents
Base	956	335	204	375	42
Agree with selective licensing in designated areas	56%	67%	13%	67%	69%
Disagree with selective licensing in designated areas	34%	26%	79%	19%	19%
Positive impact on proposed areas	58%	67%	15%	70%	74%
Positive impact on nearby areas	46%	54%	12%	54%	69%
Positive impact on you / your business / organisation	43%	54%	8%	50%	55%
Anti-social behaviour is a problem	75%	80%	57%	79%	86%
Deprivation is a problem	73%	77%	51%	80%	83%
Poor quality housing is a problem	72%	77%	44%	83%	83%
Agree with proposed licence fees	51%	61%	16%	60%	67%
Disagree with proposed licence fee	40%	30%	80%	29%	19%
Proposed discounts to fees are reasonable	51%	49%	36%	59%	57%
Proposed discounts to fees are unreasonable	24%	23%	44%	16%	10%
Agree improve quality of neighbourhood	62%	73%	23%	72%	86%
Agree improve property safety and standards	67%	76%	30%	78%	81%
Agree improve management standards	66%	75%	28%	76%	81%

NB. Where people identified themselves as belonging to more than one group (such as resident, private tenant etc...), we have assigned respondents to one principal group (prioritised by landlords/agents first, followed by private tenants, residents and then grouped all other respondents). Therefore, the base sizes are lower than those shown in Table 5.

In summary, the **selective licensing scheme proposal** was supported by over half of respondents who took part in the survey (56%), whilst around a third disagreed with the proposal (34%). Around two thirds of residents and private tenants were supportive of the proposal (67% each), whilst the majority of landlords and agents disagreed with the proposal (79%). 69% of all other respondents were also supportive of the proposal.

Overall, results show that a similar proportion (58%) also felt that the **scheme would have a positive impact on the proposed area**. Around half of all respondents (46%) felt the proposed scheme would have a positive impact on **other nearby areas**, and 43% felt the proposed scheme would have a positive impact **on themselves and/or their business or organisation** (43%). Residents, private tenants and all other respondents were positive across the board, whilst landlords and agents were negative across the board, feeling that it would have either a negative impact or no impact.

Over half of respondents (51%) supported the **level of licence fee**, whilst four in ten disagreed (40%). Similarly, over half (51%) agreed that the **proposed discounts on the licence fee were reasonable**, although a lower proportion felt they were unreasonable (24%). Again, support was stronger amongst residents, private tenants and other respondents, regarding the fee and proposed discounts, and weaker amongst landlords and agents.

When asked about whether the proposed licensing conditions would help improve the quality of the neighbourhood, property safety and standards, and also management standards, support was positive overall (with between 62% and 67% agreeing), although around a quarter (24-27%) disagreed. Support was stronger amongst other respondents (between 81% - 86% agreed), as well as residents and private tenants (at least seven in ten agreed). Most landlords and agents disagreed (59%-64%).

## 2. Alternatives to licensing and other comments

At the end of the survey respondents were given the chance to provide any other comments on the proposals or any alternatives that the Council could consider. The most common response was that it was vital to regularly monitor the scheme and have checks in place to enforce the scheme (71 responses), followed by a need to have improved living conditions, standards and safety, better monitoring and control and/or protection for tenants (47 responses). Following on from this, a similar number of comments were generally in agreement with the scheme (45 responses).

#### 3. Stakeholder views

In total, feedback was gathered from 7 stakeholder interviews. The stakeholders interviewed are listed in Appendix 4. Stakeholders were generally in favour, although some felt that it was vital to **inspect properties before licensing** and enforce the scheme, whilst others felt having the scheme would ensure that unlicensed landlords would be more easily identifiable and therefore enforcement could be more focused on finding and dealing with these. Most stakeholders felt that

the **fees were reasonable**, whilst the NRLA felt they were too low to have a proper inspection and enforcement element.

## 4. Views from the public meetings and written responses

Feedback was also gathered via written responses and public meetings. Some of the key points from these sections within the report are summarised here.

Some tenants and residents felt that **landlords need to be held to account** and there are clearly issues being experienced with overcrowding, ASB, crime and poor property standards, that landlords are not dealing with or acknowledging.

However, when we look at tenants who responded, some felt that **their landlord was doing a good job** and therefore questioned why the scheme was needed, whilst others were concerned that the **fees were going to be passed onto tenants** via rent increases.

Some tenants, residents and landlords questioned the possible **impact that this may have on the sector**, as landlords may choose to sell up, which could reduce the number of available rental properties.

## 5. Experiences in Haringey

The survey contained a section of questions which looked to understand views and experiences of respondents around three key issues that the selective licensing proposal is looking to improve. The key headlines from each of these is provided below:

#### **Housing conditions in Haringey**

The most commonly felt problem around housing conditions in Haringey was the **poor state of repair of private rented properties** (73% felt this was a problem), followed by **poorly maintained outside spaces in private rented properties** (71% felt this was a problem). When asked where in Haringey these problems were felt to be a concern, around a third (32%) said the **whole borough**, although around a fifth (21%) said this wasn't applicable (i.e. they didn't feel this was an issue in the wards or didn't know). The 14 wards that the proposed scheme would cover were ranked by respondents as the top 14 wards where these were an issue.

#### **Deprivation in Haringey**

Over eight in ten (82%) respondents felt that there are problems with **areas not being clean and well maintained in Haringey**, followed by three quarters (75%) who felt **poor quality housing** is a problem.

#### **Antisocial behaviour in Haringey**

The most significant problem felt by respondents was leaving rubbish in gardens/on the street (87% felt it was a problem), followed by alcohol or drug-related activity or noisy, rowdy or inconsiderate neighbours (both 79%). When asked where in Haringey these problems were felt to be a concern, around four in ten (39%) said the whole borough. The 14 wards that the proposed scheme would cover were again ranked by respondents as the top 14 wards where these were an issue.

## **Summary of findings**

Just over half of all respondents supported the key aspects of the proposed licensing scheme, including the proposed designated areas, the proposed licence fees and proposed discounts. Most private tenants, residents and 'other' respondents agree with the proposal to introduce a selective licensing scheme in 14 wards in Haringey. Most felt that it will have a positive impact on the proposed areas, and over half felt it is likely to have a positive impact on nearby areas and on them/their business or organisation. The majority of these groups also felt that the proposed conditions are likely to improve a variety of aspects, such as the quality of the neighbourhood, property safety and standards and management standards.

Conversely, the vast majority of landlords/agents disagreed with all aspects of the proposals, from the scheme proposal across 14 wards, the proposed licence fees and the discounts (although the discounts were slightly more supported than the other elements). The vast majority of landlords and agents felt that the scheme will have a negative impact or no impact on Haringey and the conditions were unlikely to improve standards.

Over half of respondents from the groups, including landlords agreed that anti-social behaviour is a problem in Haringey, as is deprivation. A much higher proportion of residents, private tenants and other respondents felt the problems to be worse than landlords/agents did.

The majority of stakeholders interviewed were supportive of the licensing scheme – these were predominantly people working within the Council or people working with private rented tenants. Several felt that it was vital to inspect properties before licensing and that the Council has to enforce the scheme, not just issue licences.

The majority of written responses were not in favour of the scheme, with a number highlighting concerns about the evidence base, as well as querying the inclusion of specific wards within the proposals. The three London boroughs that replied were supportive of the scheme.

Lastly, views from public meeting attendees were mixed, although most expressed concerns about fees being passed onto tenants in the form of rent increases.

# Introduction

## **Background**

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, significant and persistent anti-social behaviour (ASB) and correlated deprivation in areas containing high concentrations of privately rented properties.

Haringey Council is considering introducing a targeted selective licensing scheme, under Part 3 of the Housing Act 2004, to help tackle these problems in areas of the borough where they feel there is the greatest level of need.

Before making any decision, the Borough commissioned M·E·L Research to gather local views, in particular from local landlords, private tenants, agents, residents, businesses and organisations inside Haringey and beyond.

## **Proposals**

Haringey is proposing to introduce a selective licensing scheme in 14 wards of the borough through two designation areas, with known issues around poor property conditions, anti-social behaviour and deprivation. These are:

Bounds Green Northumberland Park Tottenham Green

Bruce Grove Seven Sisters West Green

Harringay St Anns White Hart Lane

Hornsey Stroud Green Woodside

Noel Park Tottenham Hale

Under the scheme, landlords of private rented properties within the proposed designation areas will be required to obtain a licence to rent out their property to a single-family household or two unrelated sharers (excluding properties falling within certain exemption criteria). Landlords will be charged an associated fee for registration and the scheme will run for a five-year period.

The consultation focused on the degree to which respondents agreed or disagreed with the proposal to introduce the selective licensing scheme, the impact the proposed scheme would have on respondents and Haringey more generally, as well as views on the proposed licence fees, discounts, and conditions. It also looked at respondents' experiences of issues in the borough, around property conditions, deprivation and anti-social behaviour.

## **Public consultation**

The public consultation took place over a 16-week period (17<sup>th</sup> May to the 5<sup>th</sup> September 2021). An online survey was used as the principal 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 to gather any written comments or feedback that have been analysed and included in the appendices.

Throughout the consultation, the response rate and demographic profile of respondents was periodically reviewed. The Council responded by extending the consultation period by 4 weeks from the original end date of 8<sup>th</sup> August 2021 to maximise participation from key stakeholders, including protected and vulnerable groups.

## **COVID-19** pandemic

The start of the consultation coincided with the commencement of 'Step 3' of the Government's roadmap for lifting the national lockdown in England (which had been in place since 6<sup>th</sup> January 2021). The roadmap had been announced on 22<sup>nd</sup> February 2021 by the Prime Minister and two phases of lockdown easing had already been completed prior to the launch of the consultation.

Step 3 saw the Government relax their previous guidance on outdoor gatherings by increasing the limit of people allowed to mix outdoors from 6 people (or two households) to 30 people. Formerly prohibited indoor social gatherings were legalised for 6 people (or two households) and indoor venues reopened.

In line with the Housing Act 2004, 80(9), the Council developed a communications plan to ensure all persons who were likely to be affected by the proposals had an opportunity to take part in the consultation. The plan leveraged a variety of communications channels to maximise the Council's reach despite the pandemic restrictions, including a widely publicised digital advertising campaign and direct marketing letters/e-mails to key stakeholder groups.

As the Government's planned easing of the pandemic restrictions was to be kept under review, the Council took the decision to not schedule any 'in person' promotional activities. This decision was reinforced by the limited availability of COVID-safe venues across the Council's locations that would allow for the required social distancing measures. As a result, all consultation events were held online. Various provisions were also made to ensure that digitally excluded stakeholders still had an opportunity to share their views, including reaching out to local community and outreach groups and writing directly to 44,000 private tenants. The table below provides a high-level overview of the consultation activities undertaken and the level of restrictions at the time of their delivery.

Table 2: Timeline of pandemic restrictions and consultation activities

From	COVID-19 restrictions/announcements	Consultation activities		
17 <sup>th</sup> May 2021	<ul> <li>Entered step 3 of the Government's roadmap for lifting the lockdown in England:</li> <li>Limit of 30 people allowed to mix outdoors.</li> <li>'Rule of six' or two households allowed for indoor social gatherings.</li> <li>Indoor venues reopened, including pubs, restaurants, and cinemas.</li> <li>Up to 10,000 spectators allowed to attend outdoor-seated venues like football stadiums.</li> </ul>	<ul> <li>Digital: Launched digital advertising and social media campaigns; set-up a dedicated consultation webpage and signposted the consultation across the Council's website; and a campaign was launched across London Property Licensing's platforms.</li> <li>Direct marketing: Letters and emails sent targeting landlords, letting agents, and managing agents.</li> <li>Non-digital: Published a press release, distributed leaflets and posters to customer centres, libraries, resource hubs and local businesses; and, displayed adverts on 22 billboards across the borough.</li> </ul>		
14 <sup>th</sup> June 2021	Prime Minister announced that the planned step 4 of the easing of restrictions in England on 21 June 2021 would be delayed by 4 weeks to combat the rising cases of the Delta variant.	<ul> <li><u>Digital:</u> Regular posting and monitoring continued across all digital and social media campaigns; and two online public workshops were held.</li> </ul>		
21st June 2021	<ul> <li>30 people cap on weddings was abolished.</li> <li>All other step 3 restrictions remained in place.</li> </ul>	<ul> <li><u>Direct marketing:</u> Letters sent targeting Haringey Council leaseholders and their tenants, households indicated to be renting privately and Council employees.</li> <li><u>Non-digital:</u> Commenced reaching out to partner organisations to ask them to promote the consultation to their client groups and staff; attended virtual stakeholder meetings to encourage participation; placed adverts in Haringey People Magazine and Enfield Independent; and,</li> </ul>		

		continued displaying adverts on 22
		billboards across the borough.
19 <sup>th</sup> July 2021	Entered step 4 of the Government's roadmap for lifting the lockdown in England:  • All legal limits on social contact were removed, and the final closed sectors of the economy reopened (e.g. nightclubs).	billboards across the borough.  Digital: Regular posting and monitoring continued across all digital and social media campaigns; one more online public workshop was held; and, conducted 7 remote partner interviews.  Direct marketing: Letters sent targeting existing HMO licence holders.  Non-digital: Continued reaching out to partner organisations to ask them to promote the consultation to their client groups and staff;
		continued attending virtual stakeholder meetings to encourage
		participation; and, continued displaying adverts on 22 billboards across the borough.

#### **Communication channels**

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 interested parties in neighbouring boroughs.

As there was no existing selective licensing scheme in place, the Council did not have the benefit of an existing mailing list for their key stakeholder groups. To help spread the word far and wide, the Council collaborated with local partner organisations and other internal departments to promote the consultation.

In addition, targeted communications and accommodations were made throughout the consultation to reach the diverse communities that Haringey serves, including:

Translations of direct marketing communications offered

Connected Communities asked to facilitate participation for persons with accessibility needs

Officers attended the Multi-Faith Forum to encourage leaders to promote the consultation within their communities

Council consulted the Haringey Together Citizens Panel

Contact was made with various local community groups to encourage them to promote the consultation to their client groups, such as:

Cypriot Centre

Embrace UK

Haringey Migrant Support Centre.

A full list of all activities taken to promote the consultation is below:

Table 3: Communications activities (within the borough)

i. Communicati	ons targeted within the borough
Direct marketing	<ul> <li>Letter to approximately 44,000 households indicated to be renting privately</li> </ul>
	in the borough – 21 June 2021
	<ul> <li>Letter to 4,352 Haringey Council leaseholders (and their tenants, where</li> </ul>
	applicable) – 17 June 2021
	<ul> <li>Letter to 175 managing agents operating in the borough – 28 May 2021</li> </ul>
	<ul> <li>Email to 196 landlord/letting agents with an existing HMO licence in the</li> </ul>
	borough and a registered email address – 26 May 2021
	<ul> <li>Letter to approximately 1,400 existing HMO licence holders in the borough</li> </ul>
_	– 24 August 2021
Partner	• Email to over 50 partner organisations between 9 July 2021 and 24 August
	2021
	Letter to landlord associations – 26 May 2021
	Mailshot to Connected Communities and team meeting attended on 15
	June 2021  Mailshot to Yearly Years (they also attended the above meeting on 15 June
	<ul> <li>Mailshot to Yearly Years (they also attended the above meeting on 15 June 2021)</li> </ul>
	<ul> <li>Mailshot to the Multi-Faith Forum and forum attended on 27 July 2021</li> </ul>
	Mailshot to Neighbourhood Watch and Safer Neighbourhood Panel and
	meeting attended on 27 July 2021
	<ul> <li>Local Citizens Advice Bureau promoted the consultation public workshops</li> </ul>
	on their Facebook and Twitter accounts on 31 May 2021 and 21 June 2021.
	They also promoted the consultation as part of the research interviews that
	they undertook for their recent report on the private rented sector in
	Haringey
	<ul> <li>Haringey Adult Learning Service promoted the consultation in their</li> </ul>
	newsletter – June 2021
	<ul> <li>7 partner interviews held on the week commencing 30 August 2021</li> </ul>
Digital	<ul> <li>Information made available throughout the Council's website for the</li> </ul>
	entire consultation period and a dedicated webpage was created
	<ul> <li>Regular reminders with links to the consultation were posted out via social</li> </ul>
	media between 18 May 2021 – 3 September 2021
	<ul> <li>33 posts on Facebook, with over 8400 impressions, 2 reactions and</li> </ul>
	8 shares.
	• 34 tweets on Twitter, receiving a total of 20 re-tweets, 2 quote
Dugge Q Madia	tweets, 29 likes and 8 comments
Press & Media	Advert in Haringey People Magazine in June-July edition - distributed to all
	households in the borough (Approx. 117,000 per edition)  Advert in Haringey People Extra on 27 August and 3 September 2021 –
	emailed to 4,500+ subscribers.
	emanea to 4,500+ substitue is.

	<ul> <li>Adverts displayed on digital screens around the borough -22 locations (shown here)</li> <li>Over 1000 leaflets were distributed at the Council Customer Services centres, libraries, resource hubs and local businesses – 19 May 2021.</li> <li>Posters were displayed within the Council Customer Services centres – 19 May 2021</li> </ul>
Internal	<ul> <li>Email to all Homes for Haringey employees – June 2021</li> <li>Advertisement on the Haringey Council staff intranet news board – 14 July</li> </ul>
	2021  Email to all council members -23 June 2021

**Table 4: Communications activities (outside of the borough)** 

ii. Communicati	ons targeted outside of the borough and beyond
Partner	<ul> <li>Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents – 25 June 2021</li> </ul>
Digital	<ul> <li>Programmatic digital call-to-action adverts displayed across a wide-range of platforms throughout the consultation period - with over 700,000 impressions and an interaction rate of over 2,000. The click-through rate was 0.7%, which is above the national average for display ads of 0.3-0.6%. Website and social media placements included but were not limited to:</li></ul>
Press & Media	<ul> <li>entire consultation period and a dedicated webpage was created</li> <li>Press release and consultation picked up by:</li> </ul>
1 1 C33 & Wicula	Local: Advert displayed in the Enfield Independent on 14 July 2021.
	Distribution of 8,000 per edition.
	<u>Trade Press:</u> Several adverts were displayed on the London Property
	Licensing webpage (in a variety of formats) between 8 June and 5 September 2021.

In addition, three public meetings were held with interested parties who signed up to attend an online workshop, with 27 attendees, and qualitative views were gathered, which are presented in the report.

# **Profile of respondents**

An online survey was completed by 956 respondents, with 5 of these being from respondents having no connection with Haringey (i.e. do not reside, work, let a property or operate a business in Haringey). A breakdown of respondent types is provided in the table on the next page.

Table 5: Respondent profile to the online survey

Respondent profile	Number	% of responses
Resident	489	51%
Private landlord	195	20%
Letting agent	11	1%
Managing agent	15	2%
Private tenant	381	40%
Work in Haringey	78	8%
Business in Haringey	26	3%
Other	34	4%
No connection	5	1%

(Multiple answers possible)

## **Reporting conventions**

Owing to the rounding of numbers, percentages displayed on 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 <u>text</u> 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 usually add up to 100%.

Where free text questions were asked, comments have been coded against common themes. Where there are less than 5 comments attributed to a theme, they have been included under 'other'.

The results in the report by sub group are presented by landlord/agent, resident, private tenant and all other respondents (grouped together from all other groups, due to small numbers in each). Where people identified themselves as belonging to more than one group, we have assigned respondents to one principal group (prioritised by landlords/agents first, followed by private tenants, residents and then by business in Haringey, work in Haringey, no connection and other').

The number of respondents to each question is presented as 'N=' throughout the report.

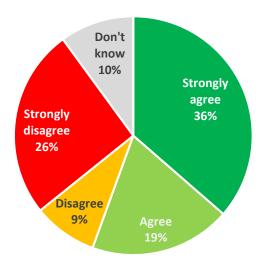
# **Survey responses to Selective Licensing proposal**

In total, we received 956 responses, made up of 950 from the online survey and 6 postal surveys. The profile of respondents is shown in Appendix 3. Below is a summary of these responses combined. The Council will consider and respond to the comments from the survey, along with those from the written responses, in the Council's response to representations, which will be published alongside the final proposal considered by the Council's Cabinet.

## **Selective Licensing Scheme**

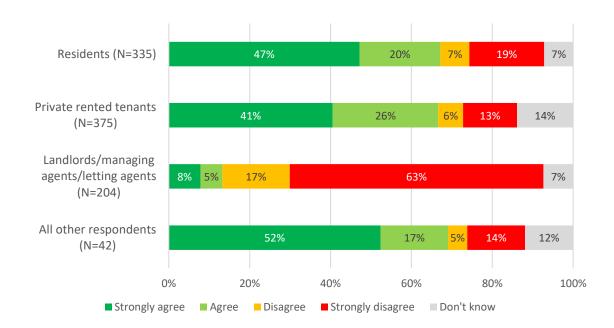
Overall, around over half (56%) of survey respondents agreed with the proposal to designate the proposed areas for Selective Licensing, with over a third (36%) strongly agreeing and a further 19% agreeing. In contrast, over a third (34%) of respondents didn't agree, with a quarter of these strongly disagreeing (26%).

Figure 1: Level of agreement with the proposal to designate the specified areas for Selective Licensing (N=956)



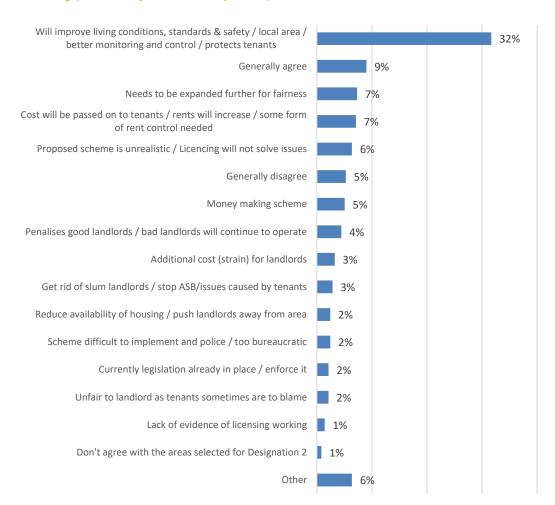
As shown below by respondent type, support for the proposal to introduce selective licensing was strongest among **residents and private tenants** (67% agreeing), as well as all other respondents (69% agreeing), with a higher proportion of other respondents strongly agreeing (52%). In contrast, **the majority of landlords/agents** disagreed (79%), with most 'strongly disagreeing' (63%).

Figure 2: Level of agreement with the proposal to designate the specified areas for Selective Licensing (by respondent type)



All respondents were then asked to provide their reasons why they agreed or disagreed with the proposed scheme. Comments show that the most common reasons for agreeing included **improving living conditions**, standards & safety, the local area, better monitoring and control, and protecting tenants (313 respondents), followed by agreeing with the scheme (89 respondents). The most common reasons for disagreeing included costs will be passed on to tenants/rents will increase/rent control is needed (70 respondents) and that the proposed scheme is unrealistic/it will not solve the issues (63 respondents). A proportion of those who did not agree with licencing and those who agreed with licensing felt that the scheme should be extended further for fairness (72 respondents).

Figure 3: Survey comments around why respondents agreed or disagreed with introducing Selective Licensing (themed by common responses)



# Impact of the scheme

The survey then asked whether respondents felt the proposed selective licensing scheme would have an impact (positive, negative or none) on the proposed areas, other nearby areas and them individually and/or their business or organisation.

Over half (58%) of respondents felt the proposed scheme would have a positive impact on **the proposed areas**, 18% felt it would have a negative impact and a further 11% felt it would have no impact.

Around half of respondents (46%) felt the proposed scheme would have a positive impact on **other nearby areas**, whilst equal proportions felt it would have a negative impact or no impact on other nearby areas (17% each).

Finally, fewer respondents felt the proposed scheme would have a positive impact on **themselves** and/or their business or organisation (43%), with 22% stating that they felt it would have a negative impact. 15% felt it would have no impact at all.

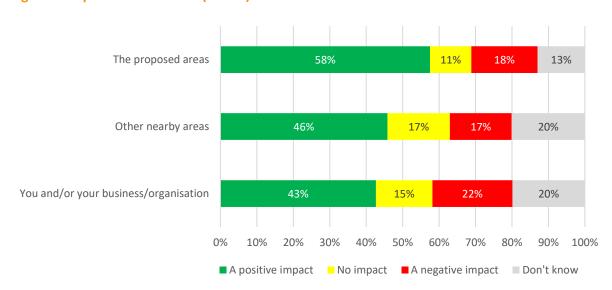


Figure 4: Impact of the scheme (N=956)

When broken down by type of respondent, the views vary. In summary:

The majority of Landlords and agents believe that the proposal would have either no impact or a negative impact on the proposed areas, other nearby areas and themselves and/or their business or organisation. Just under six in ten (59%) felt it would have a negative impact on them and their business/organisation.

In contrast, the majority of **residents and private rented tenants** have similar views about the impact of the proposed scheme, particularly around the impact on the proposed areas (67% and 70% respectively felt it would be positive). Around half also felt the scheme would positively impact on other nearby areas and individuals and/or organisations.

All other respondents were most positive about the impact of the proposed scheme, particularly around the impact on the proposed area (74% felt it would be positive).

Figure 5: Impact of proposed scheme on the proposed areas (by respondent type)

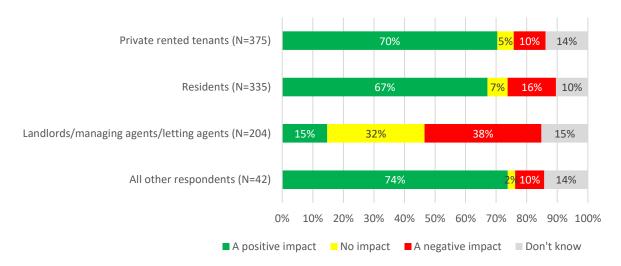


Figure 6: Impact of proposed scheme on other nearby areas (by respondent type)

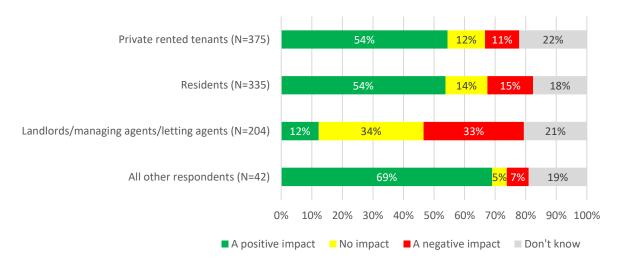
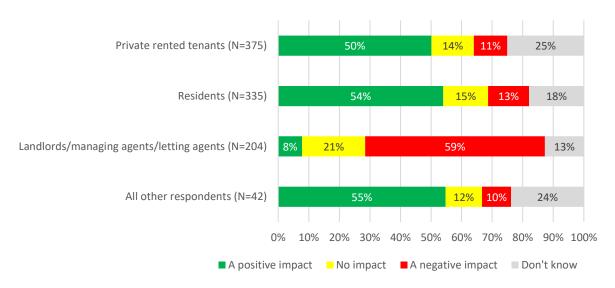


Figure 7: Impact of proposed scheme <u>on you and/or your business/organisation</u> (by respondent type)



# Problems in the proposed areas

The survey then asked whether respondents felt certain issues were a problem in the proposed areas for the selective licensing scheme.

Across each of these issues, around seven out of ten or more respondents stated them as a problem, ranging from 72% for **poor quality housing** up to 75% for **anti-social behaviour**, with over half (53%) stating poor quality housing as a major problem.

However, around one in six did not know whether deprivation (17%) or poor quality housing (16%) were problems and one in seven (14%) didn't know whether anti-social behaviour was a problem.

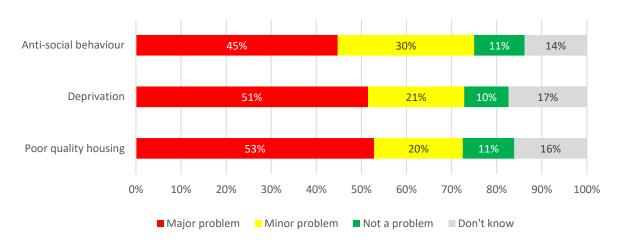


Figure 8: Extent of problems within the proposed areas (N=956)

When broken down by type of respondent, the views vary, as shown in the charts below. In summary:

**Residents and private tenants** were more likely to believe that these are major or problems in the proposed areas, compared to **landlords and agents**. Greater proportions of these respondents also believed these were major problems as opposed to minor problems. Poor quality housing was rated as being the largest 'major' problem by both private tenants and residents (66% and 61% respectively).

More **landlords and agents** believed that these problems were not a problem in the proposed areas or didn't know if they were a problem, compared to private tenants and residents. This was greatest for poor quality housing, with over half (56%) who felt it wasn't a problem/did not know, compared to tenants and residents (17% and 23% respectively).

All other respondents were more negative than all other groups, particularly around ASB, with 87% stating this was a problem in the proposed areas.

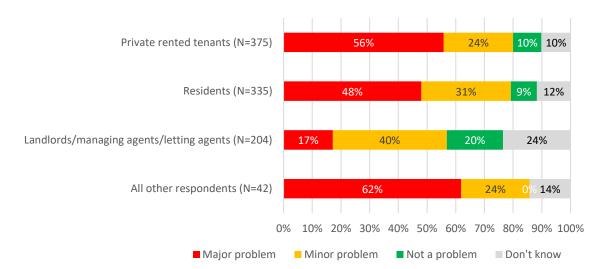


Figure 9: Extent of problem with ASB within proposed areas (by respondent type)

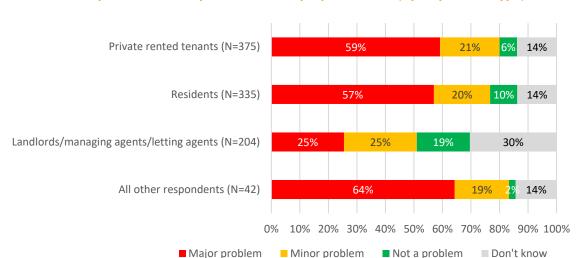
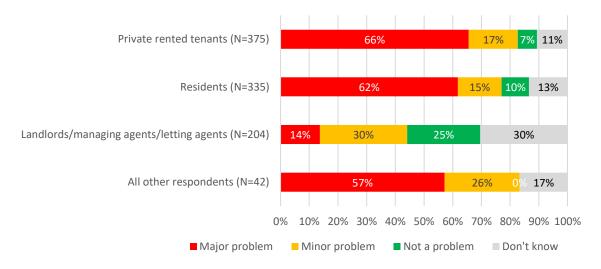


Figure 10: Extent of problem with deprivation within proposed areas (by respondent type)



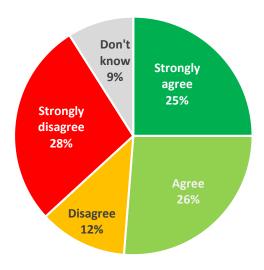


# **Licensing fees**

Under the proposed scheme (subject to specified exemptions), all landlords would be required to obtain a licence for each of their properties. The Council would charge a fee for a licence of up to 5 years for each property. Based on current costs, those applying before the designation comes into force would pay an 'early bird' discounted fee, whilst those applying after a designation comes into force would pay £600 per property. A further £50 discount would be available for those with landlord accreditation.

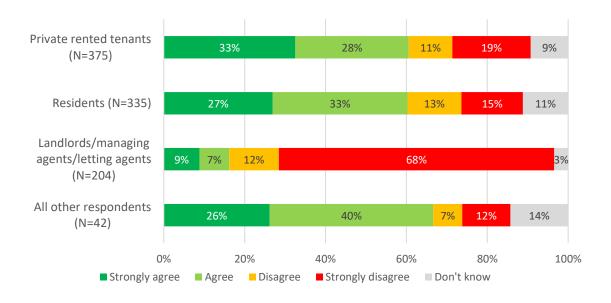
Around half of respondents (51%) agreed with the proposed fee, with 25% agreeing strongly and 26% agreeing. This compares to four in ten (40%) who disagreed, with 28% disagreeing strongly.

Figure 12: Level of agreement with the proposed licensing fees (N=956)



When we look at respondent type, six in ten **residents and private tenants** (61% and 60% respectively) agreed with the proposed licence fees, with around three in ten disagreeing. **Landlords/agents** on the other hand were not in favour, with eight in ten (80%) disagreeing with the proposed fee, whilst only 16% agreed. All other respondents were most positive, with two thirds (67%) agreeing.

Figure 13: Level of agreement with the proposed licensing fees (by respondent type)



The survey then asked respondents if they had any comments about the proposed fees. The most common response was negative and that the **costs may be passed on to tenants, rents will increase, rent control is needed** (161 respondents). The next most frequent theme was **disagreeing/not in** 

favour (133 respondents), followed by those who positively felt that the fees were appropriate, reasonable, will have a positive impact (77 respondents).

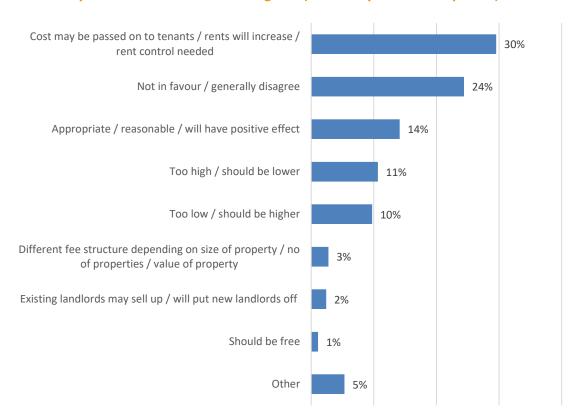
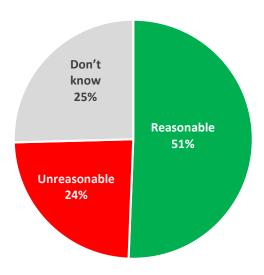


Figure 14: Survey comments about the licensing fees (themed by common responses)

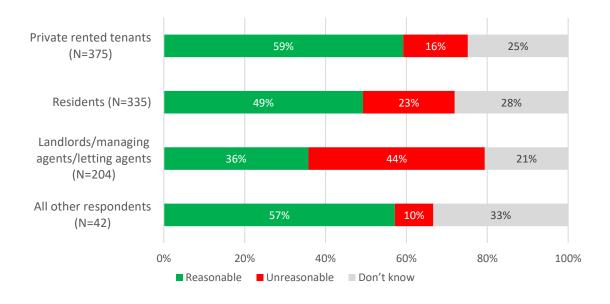
The survey also asked whether respondents felt the proposed discounts to the license fees were reasonable or unreasonable. Half (51%) of respondents thought the discounts were reasonable, whilst around a quarter (24%) felt they were unreasonable. A further quarter (25%) stated don't know.

Figure 15: Are the proposed discounts to the licence fees reasonable or unreasonable? (N=956)



When we look at results by respondent type, a higher proportion of **private rented tenants** (59%) felt the discounts proposed were reasonable, compared to residents (49%) and landlords/agents (36%). 44% of **landlords/agents** felt the proposed discounts were unreasonable. Over half of all other respondents (57%) felt the discounts were reasonable.

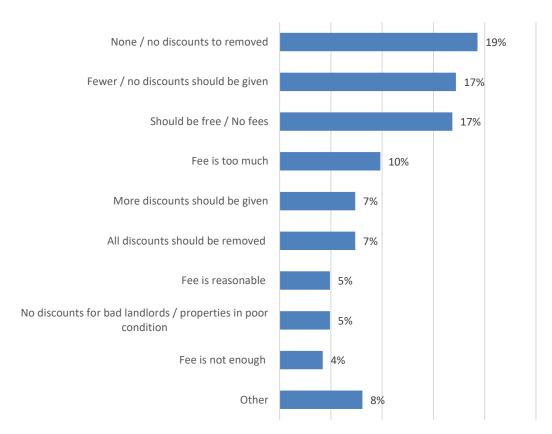
Figure 16: Are the proposed discounts to the licence fees reasonable or unreasonable? (By respondent type)



The survey then asked respondents to provide some further free text responses specifically around the discounts. The first asked respondents if they had any comments about whether there were any

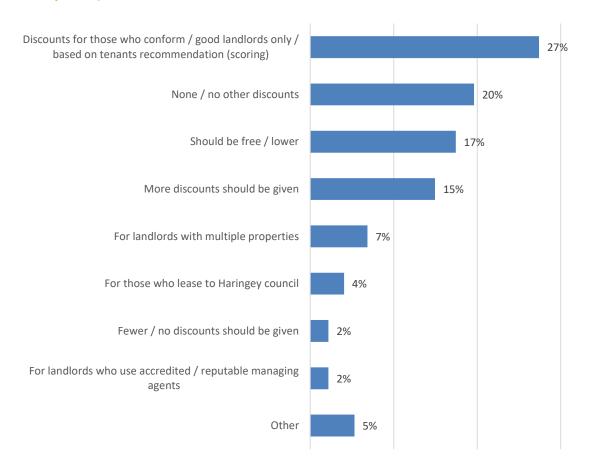
discounts that should be removed. The most common response was that **none of the discounts should be removed** (55 respondents), followed conversely by **fewer discounts or no discounts should be given** (49 respondents) and the **scheme should be free/no fees** (48 respondents).

Figure 17: Survey comments on whether any discounts should be removed (themed by common responses)



Secondly, respondents were asked to provide suggestions on any additional discounts that the Council could consider. The most common response was to provide discounts for **those that conform/good landlords only/those who tenants recommend** (88 respondents). This was followed by **none/ no other discounts** (63 respondents) or that it should be **free/lower** (56 respondents).

Figure 18: Survey comments on whether any additional discounts could be considered (themed by common responses)



## **Licence conditions**

The final questions in the consultation looked at the proposed selective licensing scheme conditions, which is aimed at ensuring licensed properties are safe and well managed.

The survey asked respondents to state the extent to which they agreed or disagreed that the proposed conditions would **improve the quality of the neighbourhood**, **improve property safety and standards** and **improve management standards**. Over six out of ten (62-67%) respondents agreed with the proposed licence conditions to improve these aspects, although around a quarter (24-27%) disagreed, with most strongly disagreeing.

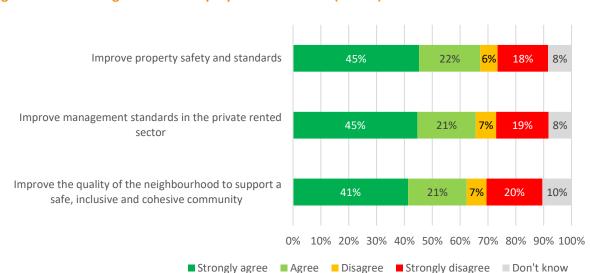


Figure 19: Level of agreement with proposed conditions (N=956)

When broken down by type of respondent, support for the proposed conditions varies, as shown in the charts below. In summary:

- Support was strong from residents and private tenants, with at least seven in ten in agreement with the proposed conditions to improve the quality of the neighbourhood, property safety and standards and management standards.
- On the other hand, most **landlords and agents** disagreed with the proposed licence conditions, (with between 59%-64% disagreeing).
- All other respondents were most positive, with over eight in ten in agreement that the conditions would improve the various aspects.

Figure 20: Level of agreement with proposed conditions to improve the quality of the neighbourhood (by respondent type)

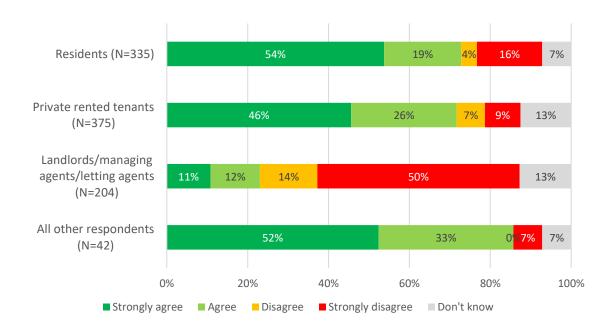


Figure 21: Level of agreement with proposed conditions to improve property safety and standards (by respondent type)

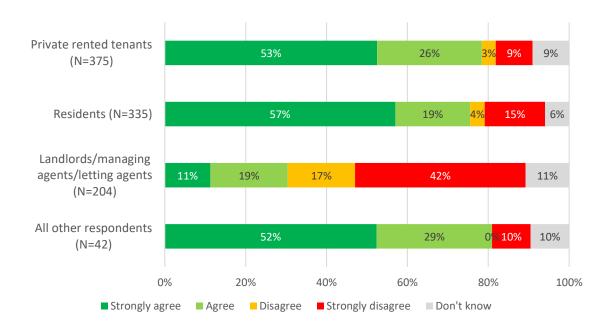
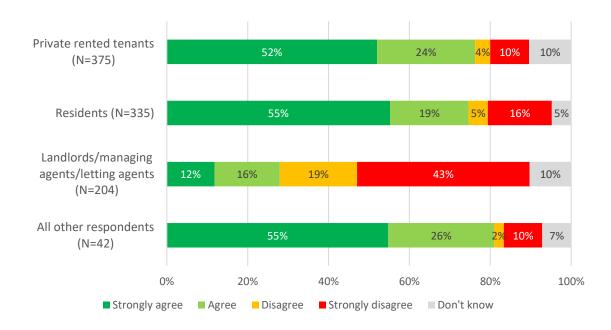
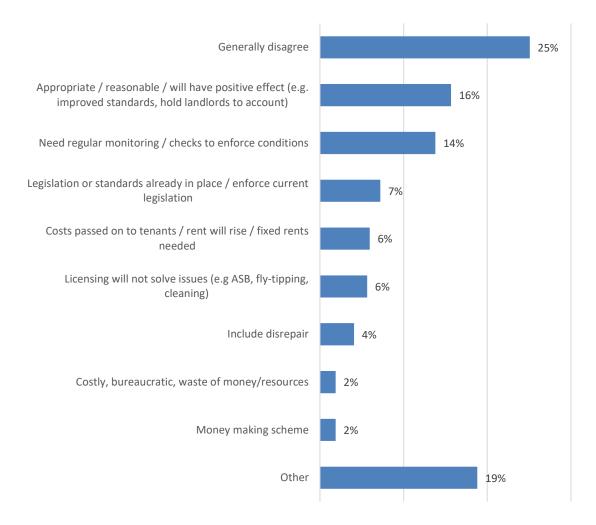


Figure 22: Level of agreement with proposed conditions to improve management standards (by respondent type)



Respondents were asked if they had any specific comments about the proposed licence conditions or any suggestions for alternative or additional conditions. The most common response was to **disagree** with the scheme/conditions as a whole (80 comments). This was followed by 50 respondents who felt that the conditions were appropriate, reasonable, will have a positive effect (e.g. to improve standards and/or hold landlords to account). Following this, 44 respondents mentioned a need for regular monitoring and checks to enforce the conditions set out in the proposals.

Figure 23: Survey comments about the proposed licence conditions and other suggestions for alternative/additional conditions (themed by common responses)

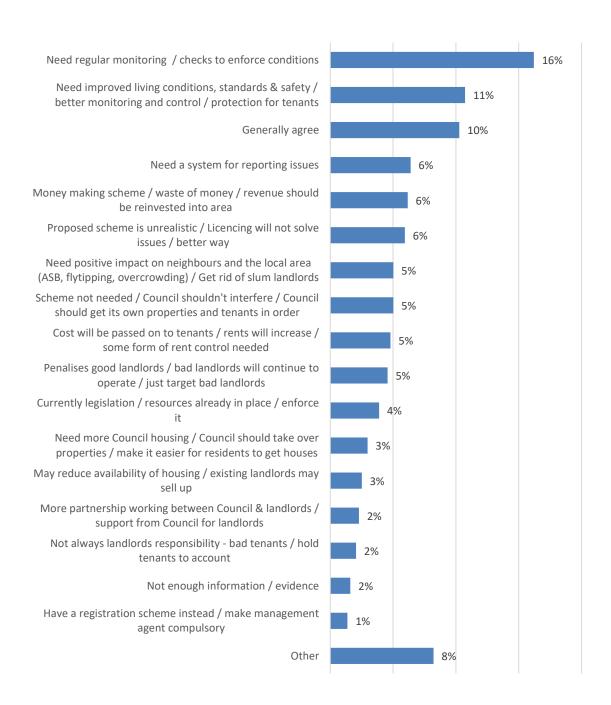


### Other comments and suggestions

At the end of the survey, respondents were given the chance to provide any other comments on the proposals or any suggestions for alternative ways of dealing with problems in the areas or any ideas for improving the proposed scheme. These are shown below, mirroring many of the open-ended comments already seen in this report.

The most common was that it was vital to regularly monitor the scheme and have checks in place to enforce scheme (71 responses), followed by a need to have improved living conditions, standards and safety, better monitoring and control and/or protection for tenants (47 responses). Following on from this, a similar number of comments generally agreeing with the scheme (45 responses).

Figure 24: Survey comments for 'any other comments on the proposal/ suggestions on alternatives (themed by common responses)



# **Public meetings**

Three public meetings were held as part of this consultation, all online due to the COVID-19 restrictions, on the 5<sup>th</sup>, 16<sup>th</sup> and 21<sup>st</sup> July 2021. These offered people the chance to hear and see the proposals outlined by Haringey Council, to ask questions and to put forward their views. In total, 27 people attended the meetings, whilst 41 booked to attend. Here is a summary of the key points.

### Scheme overall

A few participants asked how landlords are going to be forced to come forward and how the Council will ensure that not just good landlords take part in the scheme.

Some participants were unclear who would need a licence, the cost if you have a number of properties, and whether it would affect properties already licensed under the Additional/Mandatory (HMO) schemes.

Some were unsure what the licence conditions covered (such as whether there would be minimum sized rooms required) or whether families would be evicted if the property/room sizes/number of households in a property do not meet the criteria set.

### **Proposed wards**

Some participants asked why some areas were in and others not when the evidence proposed showed mixed evidence that could include/exclude wards (for example Hornsey being in, but Crouch End being out).

### **Fees**

A few participants commented that the costs to landlords will be passed to tenants in rent increases, therefore making it not just a tax on landlords, but on renters.

Some questioned how the fees were calculated and how many staff need to be employed to run the scheme/enforce it.

### **Impact**

Some questioned the negative impact that this may have on landlords, and suggested that some may leave the sector, therefore reducing the number of properties available to rent.

One tenant asked how the Council is going to protect the scheme from hurting tenants, as they will be affected by fees being passed onto them and also any retaliations if they do complain to the Council about their landlord.

One participant asked how impact is going to be measured (such as what KPIs are going to be in place), whilst another asked whether the Council will track changes in private rental availability as a result of the scheme.

## Stakeholder views

We spoke to 7 stakeholders representing mainly the Council and those who work with tenants in Haringey. 5 other stakeholders were invited to take part in an interview. The list of these organisations is provided in Appendix 4. Here is a summary of their views.

#### Views overall

- Haringey Council's ASB and Enforcement team were in favour of the scheme, particularly if the Council are able to identify who the landlord/responsible person is and deal directly with them. They would prefer working with landlords, ensuring they understand what they need to do and they have provided tenants with the information they need.
- Haringey's Cabinet member felt the scheme was something that was supported by most Councillors and needed to tackle PRS housing standards in Haringey. They felt that it would be extremely important that if it were to go ahead that both landlords/agents and tenants should be made aware of it.
- Citizens Advice welcome the scheme and felt that the private rented sector has been neglected for years. They felt that there are some assumptions around the PRS that are incorrect in Haringey and a lack of understanding of the reality of the sector, and that there needs to be much greater engagement with the sector.
- The NRLA said they would support something if it was deliverable and was delivered. However, they felt that if Haringey want to improve the area and tackle the underlying problems, then this needs to be inspection led and they have to inspect all the properties. They had little confidence that this would be the case, nor that the Council could deliver it with the resources that they could afford with the budget.
- Cambridge House was supportive of the scheme, although felt that it would be better to do a borough wide scheme (as bad landlords can own properties anywhere). They support it because regulation is weak, and licensing is the only tool that local authorities have to be proactive. They did feel however, that there should be an inspection of all properties before granting a licence.
- Haringey's Public Health team felt housing is a crucial indicator of poor health and inequalities, so improved housing is extremely important to tackle these issues. Poor housing and low incomes are among the factors with the greatest negative impact on health in some of the most deprived areas of Haringey, therefore they felt licensing is important to tackle these issues and make landlords raise poor standards and more easily identify criminal landlords. They felt it was a positive response to improving the health of residents.
- Haringey Council's Waste team were also supportive of the scheme and felt that licensing brings some responsibility on landlords and brings them on board, as it is in their interest to have a nicer street scene and a better reputation of their neighbourhood.

### **Proposed area**

The NRLA believed that local targeted approaches were most effective, especially those based on evidence, rather than broad brush approaches.

A number of stakeholders felt that a borough wide scheme would be easier to deliver, as all landlords renting properties to private tenants would need to have one form of licence or another, and would reduce confusions about areas, roads, wards etc where only specific licensing exist. Others however, felt that it would be difficult to justify as some areas don't have the same problems with the private rented sector as other areas in the borough.

Haringey Council's Waste team felt that fly tipping is more of a problem in the East side of the borough, particularly around white goods, furniture particularly when moving out and the PRS is a big part of the problem, therefore they felt that placing some responsibility on landlords is really important.

The Public Health team felt that the inequalities in the borough shouldn't be widened by excluding the West of the borough to such an extent, as there could be hidden pockets of deprivation that the Council isn't aware of, as most Council activities focus on the East side of the borough. However they recognised that the evidence isn't showing that a borough wide scheme would be feasible and therefore could be rejected.

### **Fees**

All stakeholders felt that the fee was affordable for landlords. One said it was a 'pittance' compared to the rent levels that are charged in the borough, whilst another felt the fee is not the issue, it is the fact that the local authority is involving themselves in their business matters that landlords don't like.

Citizens Advice said that they liked the idea of rewarding landlords for coming in early to the scheme. They felt that the fees would be passed onto tenants from a small proportion of landlords, not all, as they have seen evidence of that elsewhere. However, they were also concerned that it would not cover the inspection/enforcement that would be required for such a sizeable scheme.

The NRLA didn't feel the fees stacked up and were too low. They also suggested the way these had been laid out was incorrect, for example Part A and Part B of the fees, where they felt there was little evidence that they had split the fee. A discount within a fee was also questioned and felt this was illegal (under Gaskin ruling). They felt there could be better ways to reduce the burden on landlords (like a monthly direct debit).

They also felt that the Council would not have enough resources to deliver the scheme, therefore they felt the scheme was effectively a tax on landlords.

### Licence conditions

The ASB and Enforcement team for the Council believed that landlords can't be told to deal with all these issues alone (dealing with ASB and rubbish etc...) and should not be expected to (but work

in partnership with the appropriate agencies), but they need to do the minimum that is required of them.

This was echoed by Haringey Council's Waste Management team, who felt that they couldn't bring landlords to task for some issues, such as fly tipping, but need them to adhere to the basic requirements (keep their land clear and have adequate waste storage). They felt that licensing gives them another tool, but the first port of call would be to tackle the perpetrator and then speak to the landlord if they couldn't. The team highlighted the need to bring landlords on board to deliver their ambitions for a clearer street scene.

### Impact of the licensing scheme

- Citizens Advice referenced schemes in other areas of London that have worked successfully including Croydon and Newham but felt any licensing scheme needs to be part of a wider approach.
- They also felt that there is not a significant amount of evidence that Haringey uses enforcement powers enough, and that a licensing scheme needs to be part of an approach, not a panacea itself.
- The NRLA didn't feel that Haringey can deliver the scheme because there were not enough resources to do this properly as an inspection-led regime. They also felt that evidence from the other schemes was that Haringey don't do the inspections.
- Haringey Council's ASB and Enforcement team felt that the impact could be great if they can work directly with landlords as soon as issues are identified. There needs to be a collaborative approach, rather than a dictatorial approach to get things improved. Enforcement should only happen as a very last resort.
- One concern raised by Citizens Advice was that there could be a negative impact, or perceived negative impact within some communities around insecure immigration status if licensing is seen as a tool for immigration to use. This could mean very vulnerable groups that the scheme needs to help may be more reluctant to engage.
- Cambridge House Safer Renting who deal with private rented tenants felt that having a proactive approach to enforcement is vital from an equalities perspective. Many minority ethnic groups are not being reached via a reactive enforcement approach, so this will improve if a proactive approach is taken.
- Haringey Council's Public Health team had come across some very poorly managed private rented properties (including one bedroom flats which clearly didn't meet standards), mainly housing vulnerable tenants at the bottom end of the market.

### **Alternatives**

Cambridge House – Safer Renting felt that there are limited local tools available to local authorities as a viable option. They didn't feel that co-regulation had been shown to work to deal with poor landlords, and only typically involved the landlords that were already engaged. They therefore felt that Article 4 direction and licensing were the only credible tools available to use to 'regulate' the private rented sector.

### **Wider comments**

- Citizens Advice felt strongly that there needs to be a better dialogue with local landlords for schemes to work. They also felt that some of the assumptions about the PRS need to be challenged particularly amongst local politicians, particularly as there are a lot of young and vulnerable people living in the PRS in the borough.
- They also felt that there needs to be much greater communications and publicity going out to tenants, as most seemed to be unaware of their rights.
- They also felt that it would be useful for the Council to set out its enforcement strategy, as they have a lot of discretion about whether they are going to take more informal or formal measures. Also setting targets on no of inspections etc would be useful.
- The NRLA felt that there is enough evidence around what schemes have worked and in what context they suggested Leeds and Great Yarmouth were examples of how selective licensing can work and suggested that Haringey speak to them. They felt that inspection-led regimes are those that are most likely to succeed as they target all properties, not just giving a licence (NB they are happy to speak directly to Haringey regarding any of these points).
- They also felt energy efficiency would need to be built in at some point, as this is coming round the corner.
- Cambridge House Safer Renting suggested focusing resources as part of the licensing scheme on dealing with rubbish/litter on main streets/thoroughfares would help to raise standards.
- They also felt that streamlining the application/paperwork processes for landlords/agents may help and also cut down admin time for the Council.
- The Public Health team felt that bad landlords are less likely to licence their property, but that would then make it easier to identify problem properties which haven't been licensed and allow Council resources to be more targeted in dealing with these. They also felt that vulnerable tenants would be more likely to feel confident that they could report bad landlords and substandard properties, as they are less likely to have a licence.
- Finally, most of the Haringey Council teams mentioned different strategies that they are working on, which support the improvement of neighbourhoods and standards across the borough, which include supporting the private rented sector landlords and tenants to know their responsibilities and give the Council more power to deal with issues proactively.

# **Written responses**

We also received written responses from 36 individuals or organisations either via email or letter. The organisations that submitted formal responses are listed in Appendix 5. We have summarised these into themes below and included the full response as a separate Appendix. The Council will consider and respond to the representations in the written responses in the Council's response to representations, which will be published alongside the final proposal considered by the Council's Cabinet.

### **Penalising good landlords**

The majority of landlords who submitted written responses to the consultation were objecting to the scheme. Many felt they were being financially penalised (by being required to licence their property and pay a fee) because of a minority of bad landlords, who were unlikely to licence their properties anyway.

"Bad landlords get away with providing poor accommodation and bringing in this policy will not change that, the council should put their efforts in to dealing with them rather than penalising good landlords".

This view was supported by a couple of tenants who felt their experience of landlords had been positive and felt they shouldn't have to be paying more money.

"... all this does is decrease any profit made by the landlords who sign up to the scheme - who are probably the ones who run them properly; which in turn makes it difficult for the landlords to reinvest in properties to help the upkeep unless they increase rents in line with the fees (which goes back to the cost continues back to the tenant... My personal experience to date is that landlords have been brilliant because I choose a property that looks well kept".

### **Rent increases**

A number of comments were around concerns with fees being passed onto tenants in the form of rent increases, which will affect those who are already struggling and could force them into a more difficult financial situation:

"[The] scheme is likely to cause hardship and deprivation by forcing rents up and leading to increased homelessness at a time when the economy is already struggling. The 600 fee is high, and it is likely that landlords will recover the cost by increasing the rental price".

Others felt that adding increased costs onto landlords will result in some pulling out of Haringey and this will mean rents could increase if fewer properties are available to rent:

"Licencing will only reduce the number of landlords / up their costs which ups the costs to tenants".

### Landlords need to be held to account

Most agree that there are unscrupulous landlords that need to be dealt with. A number of tenants provided responses supporting the scheme and suggested that whilst they had requested repairs to be made, these requests were not being dealt with. They also didn't know where to go for help/support to deal with this.

"I have all sorts of problems getting the landlord to do the most basic repairs I would like some info who could help me deal with it etc. Main problem is draughty old fashioned windows and it is impossible to heat it goes straight out and I have come up in the morning to 5C in the winter. I would like to add my voice to the various issues you are trying to tackle".

One landlord was also supportive of the scheme, saying that it would create a more level playing field in areas across all private rented properties and for landlords:

"As a landlord I'm highly supportive of a licensing scheme - for all landlords, not just landlords of HMOs. It would set clear guidelines for me and tenants, and reassure my tenants about the experience they should expect".

### Issues with social housing

Several respondents felt that licensing was not enough to deal with the issues it is looking to tackle and that there were much larger social issues that needed to be addressed, particularly around a lack of social housing and poor social housing stock.

"... much of what I have experienced is not as a result of the Private Rented sector, but a lack of investment & neglect from the local council and government over the decades. Moving in poverty stricken families into the area then forcing them into the private rented sector instead of providing them with the social housing they need and deserve to give them stability of knowing they have a permanent home".

Others felt that just trying to target the private rented sector was insufficient and that homeowners and also social housing should be equally held to account for the same problems:

"I can understand that you would like to eliminate certain behaviours by bettering the condition of properties, but this should apply to all tenanted properties NOT JUST PRIVATELY RENTED... "

One landlord put more blame on the social housing sector, managed by the Council, than the private rented sector.

"Landlords who rent out sub standard properties are rare, in fact council managed properties are far more neglecting than those in the private rental sector".

### Scheme wards/questioned

A number of respondents queried the evidence around the selection of the 14 wards. Some felt that this was too wide and 'scattered' and felt it would be better to have a pilot area to test the scheme on first. They also felt that some wards don't really meet some of the criteria, such as deprivation.

"If they are going to do this they should start with something very local to see if it works in the areas worst affected. Some of the wards are not very highly deprived like Stroud Green or St Ann's or West Green - it is too broad-brush".

Another respondent questioned the inclusion of their ward particularly around private rented tenants (or at least those who are not HMO tenants) being responsible for the reported levels of ASB:

"I would like my view to be represented that I don't believe antisocial behaviour is such a problem in my ward- West green and I think it is social tenants who cause the most trouble. Not small flats with professional couples - who make up tenants in properties that aren't HMO".

### **Council should use existing powers**

A number of respondents felt that the Council already has the powers at its disposal to deal with the issues raised and questioned why a scheme is needed.

"Councils already have the authority to tackle low standard accommodation and take action against offenders. Clearly they are failing in their duty".

One respondent felt that the Council should not be making landlords responsible for things like fly tipping and ASB which are the responsibility of the Council and other authorities.

"I would like to express opposition to any proposed landlord licensing scheme in Haringey and attempting to make Landlords responsible for illegal dumping of rubbish and antisocial behaviour. These are offences which the Council and Police should be directly responsible for, not Landlords who should only be responsible for ensuring their properties are well-maintained. I find it utterly cynical and disgraceful that the Council is attempting to shift their responsibilities in law enforcement and waste management to Landlords in a scheme which would likely backfire long-term as Landlords decide to sell their properties, evict their tenants, and also pass on higher rents due to licensing".

### **Evidence and consultation questioned**

Finally, a couple of respondents questioned the evidence and data upon which the business case has been based, as well as the consultation. A response from the Haringey Leasehold Association criticised the evidence and felt it did not meet the legislation for selective licensing, citing the data used is not recent enough and that the evidence doesn't show a correlation to the private rented sector:

"... the evidence does not show that this [ASB] is correlated with PRS. It is just asserted that levels are high but there is no comparison with complaints from the social sector for instance".

Another respondent also argued that the data regarding ASB did not show a strong correlation with the private rented sector or how it compares to other types of tenure:

"Supporting documents on the Council website suggest a strong correlation between private rented property and anti-social behaviour, but seem to offer no evidence for this being a greater problem than in Council or housing association properties, for instance... are there any ASB statistics for non-privately rented property?"

All responses to the consultation have been provided to the Council.

# **Experiences in Haringey**

The opening section of the survey looked to understand views and experiences of respondents around some key issues in Haringey that the selective licensing scheme is looking to improve within the private rented sector. These included:

Housing conditions in Haringey

Deprivation in Haringey

Antisocial behaviour in Haringey

This section looks at responses to each of these in turn.

### **Housing conditions in Haringey**

The Council believes that introducing selective licensing will help them to tackle issues of poor property conditions in the 14 wards.

Respondents were given a list of issues associated with poor housing conditions and property management, and asked to state the extent to which they felt they were a problem in Haringey.

The most commonly felt problem was with the poor state of repair of private rented properties (73% felt this was a problem), followed by poorly maintained outside spaces in private rented properties (71% felt this was a problem) and poor management of the property (70%). Between 14-18% of respondents did not feel/did not know that these were problems in Haringey.

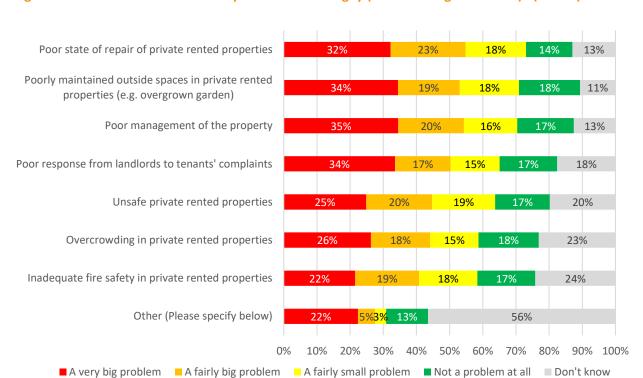


Figure 25: To what extent are these problems in Haringey (Poor housing conditions)? (N=956)

Respondents were then asked to state which wards in Haringey they felt these issues were a concern (multiple choice). The most popular response was the 'whole borough' (32%) followed by around a fifth (21%) who said this wasn't applicable (i.e. they didn't feel this was an issue in the wards or didn't know). Seven Sisters (18%), Harringay (17%) and Tottenham Hale (14%) were the top three wards selected by respondents. Muswell Hill (3%), Alexandra and Fortis Green (2%) were the bottom three, with very few stating these have problems.

The 14 wards that the proposed scheme would cover, were ranked as the top 14 wards. However, the proportions for several are very low, in particular Noel Park (7%), Hornsey (7%), Woodside (6%), Stroud Green (5%) and Bounds Green (4%).

Table 6: Where in Haringey are these issues a concern (Poor housing conditions)? (Multiple choice) (N=956)

Ward	%	Within proposed scheme?
Whole borough	32%	-
Seven Sisters	18%	Υ
Harringay	17%	Y
Tottenham Hale	14%	Y
West Green	13%	Y
White Hart Lane	13%	Y
Bruce Grove	12%	Υ
St Ann's	12%	Y
Tottenham Green	12%	Y
Northumberland Park	12%	Υ
Noel Park	7%	Y
Hornsey	7%	Y
Woodside	6%	Υ
Stroud Green	5%	Y
Bounds Green	4%	Y
Crouch End	3%	N
Highgate	3%	N
Muswell Hill	3%	N
Alexandra	2%	N
Fortis Green	2%	N
Not applicable	21%	-

Respondents were then asked whether they had experienced these issues in Haringey in the past 5 years. Around a third (35%) of respondents said that this was not applicable (or they had not experienced this), whilst 36% said they had experienced this in the home they live in and three in ten (30%) said they had in a neighbouring property/one nearby.

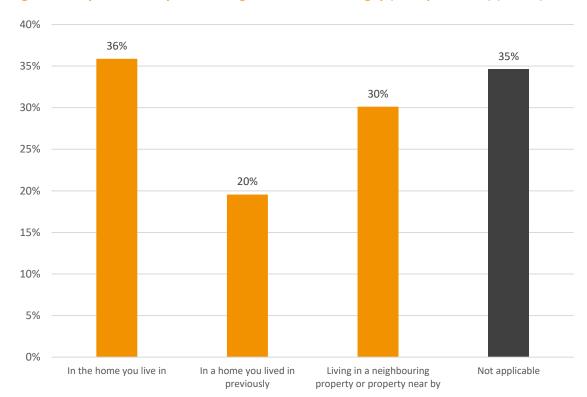


Figure 26: Experiences of poor housing conditions in Haringey (Multiple choice) (N=956)

### **Deprivation in Haringey**

Deprivation is one of the criteria that the Council has used for selective licensing. The Government's Indices of Multiple Deprivation (IMD) shows that Haringey is the 4th most deprived borough in London, and 49th most deprived in England (of 317), with the concentration in the east of the borough, where the majority of the proposed scheme is focused.

Respondents were given a list of issues associated with deprivation, and asked to state the extent to which they felt they were a problem in Haringey. Over eight in ten (82%) of respondents felt that there are problems with areas not being clean and well maintained in Haringey, followed by three quarters (75%) who felt poor quality housing is a problem. Just over half (55%) felt that fuel poverty is a problem in Haringey. Between 10-34% of respondents did not feel/did not know that these were problems in Haringey, with the highest proportion being around fuel poverty.

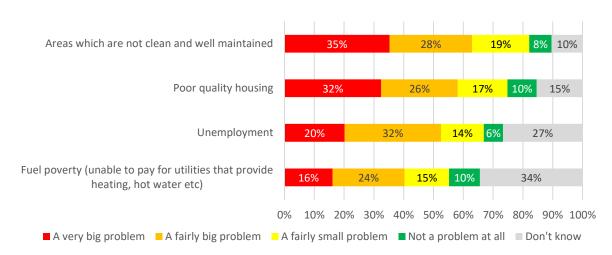


Figure 27: To what extent are these problems in Haringey (Deprivation)? (N=956)

### **Antisocial behaviour in Haringey**

Antisocial behaviour (ASB) is the final criteria that the Council has used for selective licensing. Respondents were given a list of issues associated with ASB, and asked to state the extent to which they felt they were a problem in Haringey.

The most significant problem felt by respondents was leaving rubbish in gardens/on the street (87% felt it was a problem), followed by alcohol or drug-related activity or noisy, rowdy or inconsiderate neighbours (both 79%). Abandonment of cars was felt to be the least problematic issue, with just under half (46%) responding.

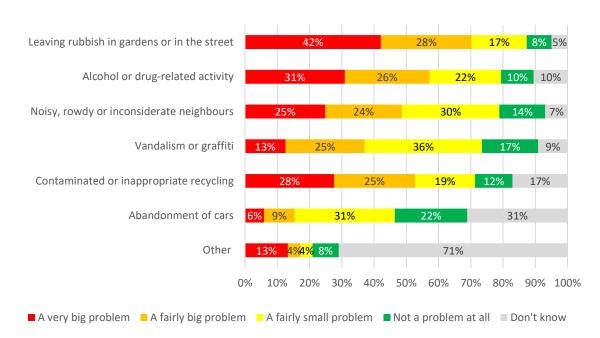


Figure 28: To what extent are these problems in Haringey (ASB)? (N=956)

Respondents were then asked to state which wards in Haringey they felt these issues were a concern (multiple choice). The most popular response was the 'whole borough' (39%) followed by a fifth who said Seven Sisters (20%), followed by Harringay (17%), Tottenham Hale, West Green and Tottenham Green (all 15%). The top 4 wards are the same as those given for the previous question around property conditions. 14% of respondents did not feel these issues were applicable in any of the wards. Muswell Hill (3%), Crouch End (3%), Highgate, Alexandra and Fortis Green (all 2%) were at the bottom, with very few stating these have problems.

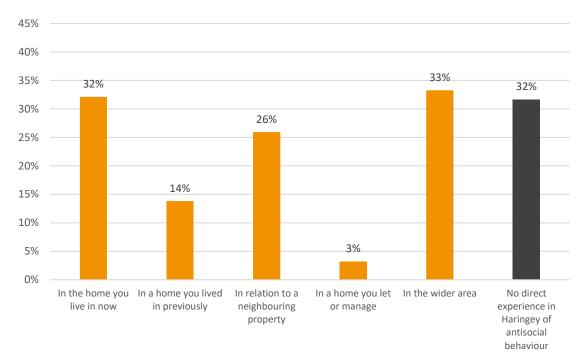
The 14 wards that the proposed scheme would cover were again ranked as the top 14 wards, although the proportions who felt there were issues in some wards were very low. These included Noel Park (8%), Hornsey (7%), Woodside (6%), Bounds Green and Stroud Green (5%).

Table 7: Where in Haringey are these issues a concern (ASB)? (Multiple choice) (N=956)

Ward	%	Within proposed scheme?
Whole borough	39%	-
Seven Sisters	20%	Υ
Harringay	17%	Υ
Tottenham Hale	15%	Υ
West Green	15%	Υ
Tottenham Green	15%	Υ
White Hart Lane	13%	Υ
St Ann's	13%	Υ
Bruce Grove	12%	Υ
Northumberland Park	11%	Υ
Noel Park	8%	Υ
Hornsey	7%	Υ
Woodside	6%	Υ
Bounds Green	5%	Υ
Stroud Green	5%	Υ
Muswell Hill	3%	N
Crouch End	3%	N
Highgate	2%	N
Alexandra	2%	N
Fortis Green	2%	N
Not applicable	14%	-

Respondents were then asked whether they had directly experienced ASB issues in Haringey in the past 5 years. A third (33%) of respondents said they had experienced them in the wider area, whilst 32% said it was in the home they live in now. Around a third of respondents (32%) said they had no direct experience of ASB in Haringey.





# Appendices

Appendix 1: Map of proposed licensing scheme

**Appendix 2: Survey questions** 

**Appendix 3: Demographic profile of respondents** 

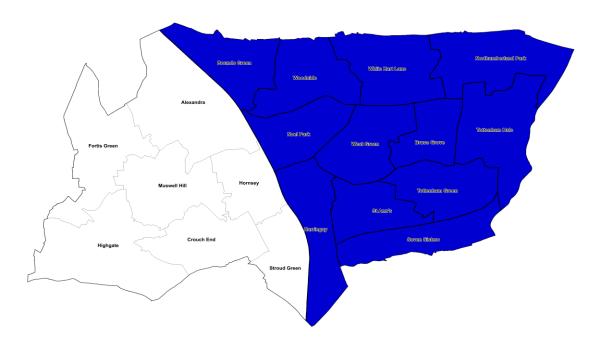
**Appendix 4: Stakeholder organisations interviewed** 

**Appendix 5: Written responses to consultation (separate document)** 

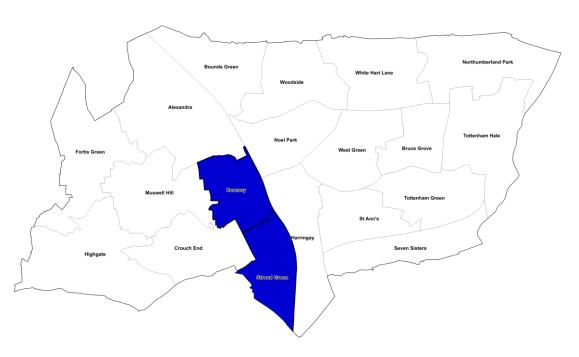
**Appendix 6: Example advertising materials** 

# Appendix 1: Maps of proposed licensing scheme

## **Designation 1**



## **Designation 2**



# **Appendix 2: Survey questions**

# Consultation on licensing private rented property in Haringey



Haringey Council is currently considering the introduction of a property licensing scheme within parts of the borough with known issues around poor property conditions, anti-social behaviour and deprivation.

- Bounds Green
- Bruce Grove
- Harringay
- Hornsey
- Noel Park

- Northumberland Park
- Seven Sisters
- St Anns
- Stroud Green

- Tottenham Hale
- Tottenham Green
- West Green
- White Hart Lane
- Woodside

Before making a decision, the Council wants to hear your views about the proposal and any alternatives we could consider. The Council would specifically like to hear from private tenants, landlords, letting and managing agents, residents and businesses or organisations operating in Haringey and surrounding areas.

You can see full details, including supporting documents, at www.haringey.gov.uk/propertylicensingconsultation

If you have any questions, then please email haringeyprs@melresearch.co.uk or call freephone 0800 0730 348

This should take no more than 10 minutes.

#### The closing date for the consultation is 5th September 2021.

The consultation is being run by M·E·L Research, an independent research company. Information you provide will only be used for research purposes and you will not be personally identifiable in any reports, however organisations may be identifiable. M·E·L Research work to the Market Research Society code of conduct.

We will hold all information securely and strictly in line with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Please visit the following to read our privacy notices: www.melresearch.co.uk/page/privacypolicy

### Section 1: Licensing private rented property in Haringey

Which of the following best describes you? <i>Please select all that apply</i>
O Resident
O Private landlord
O Letting agent
O Managing agent
O Private tenant
O Work in Haringey
O Business in Haringey
O Other (please specify)
O No connection
What is your full postcode? This information will not be used to identify you. The information will only be used to help the Council to understand if there are differing views
from respondents in different areas.

### Section 2: Housing conditions in Haringey

Haringey is committed to providing good quality, safe housing for all its residents. One of the principal aims of the selective licensing proposal is to improve property conditions for those living in the private rented sector. Approximately 27 % of Haringey's privately rented homes are likely to have disrepair that is serious enough to cause harm to those tenants who live there. Failure to effectively manage private sector housing can adversely affect the health, safety and wellbeing of tenants and can have a wider impact on the local community.

For further information on the condition of property in the Private Rented Sector in Haringey read their evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at:

https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence\_report\_for\_consultation\_final.pdf

Selective licensing can be used to tackle issues of poor property condition when it is identified that,

- a significant number of properties in the private rented sector are in poor condition, and
- are adversely affecting the character of the area, and/ or
- the health and safety of their occupants.

If an area is experiencing the above, as part of a wider strategy to tackle housing conditions, the local housing authority may consider it appropriate to make a selective licensing scheme so that it can prioritise enforcement action, whilst ensuring through licence conditions that the properties are properly managed to prevent further deterioration.

**S2Q1**. To what extent do you consider any of the following to be a problem in Haringey?

### Please tick one box for each row

	A very big problem	A fairly big problem	A fairly small problem	Not a problem at all	Don't know
Poor state of repair of					
private rented properties					
Unsafe private rented					
properties					
Overcrowding in private					
rented properties					
Inadequate fire safety in					
private rented properties					
Poor response from					
landlords to tenants'					
complaints					
Poor management of the					
property					
Poorly maintained outside					
spaces in private rented					
properties (e.g. overgrown					
1 1					
garden)					
Other (Please specify below)					
<u> </u>	issues causin	g problems?			
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y	ou think thes				
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough	ou think thes ☐ Highgate			Stroud Green	1
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough  Alexandra	ou think thes □ Highgate □ Hornsey	e issues are a		Stroud Greer Tottenham G	i reen
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough Alexandra Bounds Green	ou think thes □ Highgate □ Hornsey □ Muswell H	e issues are a	_ _	Stroud Greer Tottenham G Tottenham H	i reen
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough  Alexandra  Bounds Green  Bruce Grove	ou think thes ☐ Highgate ☐ Hornsey ☐ Muswell H ☐ Noel Park	e issues are a	_ _ _ _	Stroud Greer Tottenham G Tottenham H West Green	n ireen ale
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough Alexandra Bounds Green Bruce Grove Crouch End	ou think these □ Highgate □ Hornsey □ Muswell H □ Noel Park □ Northumb	e issues are a	_ _ _ _	Stroud Greer Tottenham G Tottenham H West Green White Hart L	n ireen ale
Other (Please specify below)  If other: What is are the other  S2Q2. Where in Haringey do y  Whole borough Alexandra Bounds Green Bruce Grove Crouch End Fortis Green	ou think thes ☐ Highgate ☐ Hornsey ☐ Muswell H ☐ Noel Park	e issues are a lill erland Park	_ _ _ _ _	Stroud Greer Tottenham G Tottenham H West Green	reen lale ane

Select all that apply

	In	the	home	VOL	live	in
_	111	uic	1101110	y O U	11 V C	

☐ In a home you lived in previously

	Living in a neighbouring property or property near by
O	Not applicable

### **Section 3: Deprivation in Haringey**

Deprivation is the result of a lack of income and other resources, which together can be seen as living in poverty and it can be measured and evidenced in various ways. The Government's way of measuring deprivation is to use a range of measures that include the categories below:

Income, Employment, Education, Health, Crime, Housing and Living environment

The Government's measure of deprivation shows that 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). The Council believes that those experiencing deprivation are likely to have or suffer from a range of other inequalities and due to this will fall into societies vulnerable categories or those in need. Accessing services for these residents is difficult and can lead to many fearing the consequences.

Using deprivation as a criterion within Haringey's selective licensing proposals allows the Council to focus resources in areas where they will have greatest need and the IMD indicator has therefore been used to identify this.

For further information on deprivation in Haringey read the evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at: https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence\_report\_for\_consultation\_final.pdf

# **S3Q1**. To what extent do you consider any of the following to be a problem in Haringey? Please tick one box for each row

			A fairly	Not a	
	A very big	A fairly big	small	problem	Don't
	problem	problem	problem	at all	know
Fuel poverty (unable to pay					
for utilities that provide					
heating, hot water etc)					
Unemployment					
Poor quality housing					
Areas which are not clean					
and well maintained					

### Section 4: Antisocial behaviour in Haringey

Haringey's vision is to be a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. The Council wants tenants to feel safe, but also neighbourhoods to not be affected by tenant

behaviour whether that be noise, rowdy behaviour, drug related offences or litter and waste issues.

The table below indicates the number of privately rented dwelling and the number of ASB incidents associated with privately rented dwelling within that ward.

Ward	No. PRS.pr	Incidents of ASB
Tottenham Green	2849	910
Bruce Grove	3068	865
Harringay	2870	858
Seven Sisters	2486	799
Woodside	2797	781
Noel Park	2059	766
St Ann's	2774	722
Hornsey	2007	642
Tottenham Hale	2566	639
Crouch End	2315	625
Bounds Green	2544	579
West Green	2022	510
Alexandra	1238	498
Muswell Hill	1243	445
Highgate	1850	437
Stroud Green	2000	393
Fortis Green	1649	363
White Hart Lane	1236	355
Northumberland Park	2287	266
Grand Total	43,775	11,711

The data analysis identifies significant and persistent levels of PRS related ASB, which the Council believes is an indication that landlords are failing to take action to combat the problem.

Designating a scheme will provide only one of a few measures that will be taken in partnership with other professionals to lead to a reduction in ASB and repeat offending.

For further information on Anti-Social Behaviour in Haringey read the evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at:

https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence\_report\_for\_consultation\_final.pdf

S4Q1. To what extent do you consider any of the following to be a problem in Haringey? **Please tick one box for each row** 

						,
		A very	A fairly	A fairly	Not a	
		big	big	small	problem	Don't
		problem	problem	problem	at all	know
Noisy, rowdy or in	considerate					
neighbours						
Vandalism or graff	iti					
Alcohol or drug-re	lated activity					
Leaving rubbish in	gardens or in the					
street						
Contaminated or i	nappropriate recycling					
Abandonment of o	cars					
Other (Please spec	cify below)					
S4Q2. Where in Hai	ringey do you think these	e issues are	e a concern	? Select a	ll that appl	у
O Whole borough	☐ Highgate	☐ Stro	oud Green			
☐ Alexandra	☐ Hornsey	☐ Tot	tenham Gr	een		
Bounds Green	☐ Muswell Hill	☐ Tot	tenham Ha	le		
☐ Bruce Grove	☐ Noel Park	☐ We	st Green			
Crouch End	☐ Northumberland Par	rk 🚨 Wh	ite Hart Lar	ne		
Fortis Green	☐ St Ann's	☐ Wo	odside			
☐ Harringay	Seven Sisters	O Not	applicable	<u>.</u>		
<b>\$4Q3</b> . In the last 5 y	years, have you had dired	ct experier	nce in Harin	gey of anti	social	

**S4Q3**. In the last 5 years, have you had direct experience in Haringey of antisocial behaviour...? **Select all that apply** 

In the home you live in now
In a home you lived in previously
In relation to a neighbouring property
In a home you let or manage
In the wider area

lacksquare No direct experience in Haringey of antisocial behaviour

### Section 5: The proposed area for the Selective Licensing scheme

The Council is proposing to designate the following 14 wards:



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

<b>S5Q1</b> . To what extent do you agree or disfor Selective Licensing? <b>Please select on</b>	_	he proposa	I to designate the	e specified wards
<ul><li>Strongly agree</li><li>Agree</li><li>Disagree</li><li>Strongly disagree</li><li>Don't know</li></ul>				
Please tell us the reason for your answer				
Section 6: Impact and Problems				
<b>S6Q1</b> . What impact, if any, do you think t	the proposed	d scheme wo	ould have on:	
Please tick one box for each row				
	A positive	No	A negative	Don't

<b>S6Q2</b> . Thinking about the proposed areas for the licensing scheme, how much of a problem do you
think each of the following issues are: Please tick one box for each row

impact

impact

impact

know

	Major problem	Minor problem	Not a problem	Don't know
Anti-social behaviour				
Deprivation				
Poor quality housing				

### **Section 7: Proposed licence fees**

The proposed areas
Other nearby areas
You and/or your

business/organisation

Licensing 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 Licencing Conditions. All Selective licence fee income is ring fenced for the administrative and operational cost of operating the licensing scheme.

Under the proposed scheme (subject to specified exemptions), all landlords would be required to obtain a licence for each of their properties. The Council would charge a fee for a 5-year licence for each property. Fees must be reasonable and must only contribute to the costs of the scheme. The Council cannot make a profit from the fees or use the fees to subsidise other services.

Based on current costs, the proposed fees for a 5-year license are:

- > Early bird Selective Licensing fee of £250 which would be for those applying before the designation comes into force.
- > Full Selective Licensing fee for those applying after the designation comes into force would be £600 per property.

There would be a further £50 discount for those with landlord accreditation.

The Council considers the proposed fees to be reasonable and not excessive. The proposed fees are based on an estimate of the actual cost of the scheme, divided by the number of properties estimated to be licensed. Experience from operating previous schemes has been used for the fee setting process. The fees will be subject to review in accordance with the Council's usual fee setting process.

Further details of the fee structure can be found in the proposed fee structure document or View Selective Property Licensing Proposed Fee Structure at:

https://www.haringey.gov.uk/sites/haringeygovuk/files/selective\_property\_licensing\_proposed\_fee\_structure\_0.pdf

CTO4. The liberty that the contract of the contract of the contract of the for Calculate at the contract of th
<b>S7Q1</b> . To what extent do you agree or disagree with the proposed fee for Selective Licensing? <b>Please select one only</b>
O Strongly agree
O Agree
O Disagree
O Strongly disagree
O Don't know
If you have any comments about the fees, please provide these below.
<b>S7Q2</b> . Do you think the proposed discounts to the licence fees are reasonable or unreasonable? <b>Please select one only</b>
O Reasonable

O Unreasonable
O Don't know

	<u> </u>		a be removed?		
<b>7Q4</b> . Are th	ere additional	discounts that	could be consi	dered?	

### **Section 8: Proposed licence conditions**

Selective Licensing conditions can be used for regulating the management, use or occupation of the house concerned. Except so far as they directly relate to a failure to manage the property, matters relating to disrepair cannot be addressed through licence conditions and will continue to be addressed, by the Council, using existing enforcement powers.

The licence will include conditions aimed at ensuring licensed properties are safe and well managed. A copy of the proposed conditions can be found at: <a href="https://www.haringey.gov.uk/sites/haringeygovuk/files/proposed\_selective\_licence\_conditions.pdf">https://www.haringey.gov.uk/sites/haringeygovuk/files/proposed\_selective\_licence\_conditions.pdf</a>

**S8Q1**. To what extent do you agree or disagree with the draft licence conditions to regulate the following? **Please tick one box for each row** 

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Improve the quality of the					
neighbourhood to support a safe,					
inclusive and cohesive community					
Improve property safety and					
standards					
Improve management standards in					
the private rented sector					

ection 9: Other Comments or Suggestions	
<b>9Q1</b> . Do you have any further comments about the Sel ny suggestions for alternative ways of dealing with pro	
ny suggestions for afternative ways of dealing with pro-	blefils in the area of any ideas for
9Q2. Would you be interested in attending one of our	
lease check this box and make sure you have left your email	address at the end of this section
lease check this box and make sure you have left your email  Yes I would be interested – provide email address be	address at the end of this section
lease check this box and make sure you have left your email	address at the end of this section
lease check this box and make sure you have left your email  Yes I would be interested – provide email address be	address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested – provide email address be  No	address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested — provide email address be  No  PQ3. If the Council decides to go ahead with Selective I	address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested – provide email address be  No	address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested — provide email address be  No  PQ3. If the Council decides to go ahead with Selective I	address at the end of this section low: Licensing in the proposed areas would you
Please check this box and make sure you have left your email  Yes I would be interested – provide email address be  No  PQ3. If the Council decides to go ahead with Selective I ke them to contact you with details of the scheme?	address at the end of this section low: Licensing in the proposed areas would you email address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested – provide email address be  No  PQ3. If the Council decides to go ahead with Selective I ke them to contact you with details of the scheme?  Please check this box and make sure you have left your expressions.	address at the end of this section low: Licensing in the proposed areas would you email address at the end of this section
Please check this box and make sure you have left your email  Yes I would be interested – provide email address be  No  PQ3. If the Council decides to go ahead with Selective I ke them to contact you with details of the scheme?  Please check this box and make sure you have left your expression.  Yes I would be interested – provide email address be	address at the end of this section low: Licensing in the proposed areas would you email address at the end of this section

### Section 10: About you

Thank you for providing your feedback on this consultation.

Finally, it would be really helpful to find out a bit more about you. This is to understand the views of different groups of people living in and around the borough.

<ul> <li>What is your gender? Please select one only</li> <li>Male</li> <li>Female</li> <li>I describe myself another way</li> <li>Prefer not to say</li> </ul>	
What is your ethnic background? Please select	one only
<ul> <li>White: British</li> <li>White: Irish</li> <li>White Other: Gypsy/Roma</li> <li>White Other: Greek/Greek Cypriot</li> <li>White Other: Turkish</li> <li>White Other: Kurdish</li> <li>White Other: Irish Traveller</li> <li>White Other: (please specify)</li> <li>Mixed: White and Black Caribbean</li> <li>Mixed: White and Black African</li> <li>Mixed: White and Asian</li> <li>Mixed Other (please specify)</li> </ul>	<ul> <li>Asian: Indian</li> <li>Asian: Pakistani</li> <li>Asian: Bangladeshi</li> <li>Asian: East African Asian</li> <li>Asian Other (please specify)</li> <li>Black: African</li> <li>Black: Caribbean</li> <li>Black Other (please specify)</li> <li>Chinese or other ethnic group: Chinese</li> <li>Any other ethnic background (please specify)</li> <li>Prefer not to say</li> </ul>
How old are you? Please select one only	
<ul> <li>○ Under 20</li> <li>○ 21-24</li> <li>○ 25-29</li> <li>○ 30-44</li> <li>○ 45-59</li> <li>○ 60-64</li> <li>○ 65-74</li> <li>○ 75-84</li> <li>○ 85-89</li> <li>○ 90 and over</li> <li>○ Prefer not to say</li> </ul>	

### **Disability:**

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

Do you consider yourself as a person who h	nas a disability? Please select one only
O Yes	
O No	
O Prefer not to say	
[IF YES] Is your disability related to any of th	ne following? Please select all that apply
☐ Blindness or partial loss of sight	☐ Long term illness or condition
Deafness or partial loss of hearing	☐ Mental ill health
<ul> <li>Developmental disorder</li> </ul>	☐ Physical disability
☐ Learning disability	☐ Other disability (please write in below if you wish)

# This is the end of the survey. Thank you for your time. Please send this back in the Freepost envelope enclosed.

If you would like more information about who we are and how we use the information provided please see our privacy policy at: https://melresearch.co.uk/page/privacypolicy. This includes information on your privacy rights, including the right to withdraw your consent at any time.

If you would like more formation about Haringey Council privacy statement. This is located at: https://www.haringey.gov.uk/contact/privacy-statement.

# Appendix 3: Demographic profile of respondents

### By gender

	Number of respondents	Percentage of total	Haringey benchmark comparison*
Male	354	37.03%	49.5%
Female	431	45.08%	50.5%
I describe myself another way	24	2.51%	
Prefer not to say	147	15.38%	
Total	956	100%	100%

<sup>\*</sup> Source: 2011 Census

### By age band

	Number of respondents	Percentage of total	Haringey benchmark comparison*
Under 20	1	0.10%	24.9%
21-24	17	1.78%	7.4%
25-29	91	9.52%	11%
30-44	310	32.43%	28%
45-59	253	26.46%	16.4%
60-64	38	3.97%	3.6%
65-74	71	7.43%	4.9%
75-84	18	1.88%	2.9%
85-89	1	0.10%	0.6%
90 and over	2	0.21%	0.3%
Prefer not to say	154	16.11%	
Total	956	100%	100%

<sup>\*</sup> Source: 2011 Census

### By disability

	Number of respondents	Percentage of total
Yes	108	11.30%
No	677	70.82%
Prefer not to say	171	17.89%
Total	956	100%

### By ethnic group

	Number of respondents	Percentage of total	Haringey benchmark comparison*
White: British	414	43.31%	34.7%
White: Irish	29	3.03%	2.7%
White Other: Gypsy/Roma	2	0.21%	0.1%
White Other: Greek/Greek Cypriot	19	1.99%	
White Other: Turkish	14	1.46%	
White Other: Kurdish	5	0.52%	
White Other: Irish Traveller	1	0.10%	
White Other: (please specify)	137	14.33%	23%
Mixed: White and Black Caribbean	9	0.94%	1.9%
Mixed: White and Black African	4	0.42%	1.0%
Mixed: White and Asian	13	1.36%	1.5%
Mixed Other (please specify)	13	1.36%	2.1%
Asian: Indian	16	1.67%	2.3%
Asian: Pakistani	0	0.00%	0.8%
Asian: Bangladeshi	4	0.42%	1.7%
Asian: East African Asian	0	0.00%	
Asian Other (please specify)	5	0.52%	3.2%
Black: African	26	2.72%	9.0%
Black: Caribbean	21	2.20%	7.1%
Black Other (please specify)	7	0.73%	2.6%
Chinese or other ethnic group: Chinese	8	0.84%	1.5%
Any other ethnic background (please specify)	19	1.99%	4.8%
Prefer not to say	190	19.87%	
Total	956	100%	100%

<sup>\*</sup> Source: 2011 Census

### By respondent type

Respondents could tick more than one option.

	Number of respondents	Percentage of total
Resident	489	51%
Private landlord	195	20%
Letting agent	11	1%
Managing agent	15	2%

Private tenant	381	40%
Work in Haringey	78	8%
Business in Haringey	26	3%
Other (please specify)	34	4%
No connection	5	1%
Total	956	100

### By postcode sector

	Number of respondents	Percentage of total
Within Haringey	900	94.1%
Outside of Haringey	50	5.2%
Unidentifiable/blank	6	0.6%
Total	956	100

NB. Results have been analysed by the outward code. Respondents with postcode areas that cover parts of Haringey have been categorised as 'within Haringey'.

# Appendix 4: Stakeholder organisations interviewed

We spoke to 7 stakeholders representing the following range of organisations and interests in Haringey:

NRLA (landlord agency)

Citizens Advice Haringey (tenant advice)

Cambridge House – Safer Renting (tenant support)

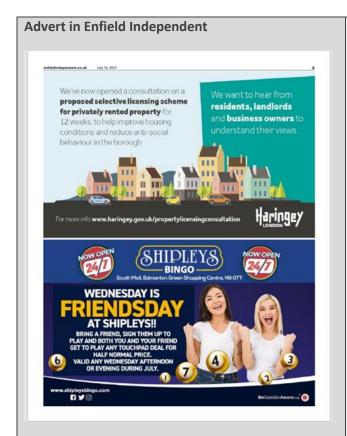
Haringey Council teams including:

- ASB and Enforcement (Environment & Neighbourhoods)
- Waste and ASB
- Public Health

Councillor (with portfolio for housing)

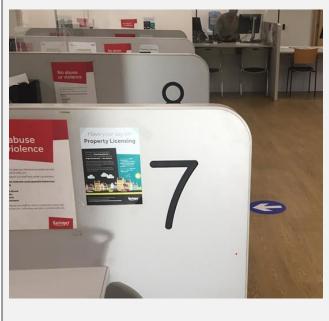
# Appendix 5: Written responses to consultation (separate document)

## **Appendix 6: Communication visuals**





A4 poster displayed within Council Customer Services centres



A5 leaflet distributed to Council customer services centres, libraries, resource hubs and local businesses



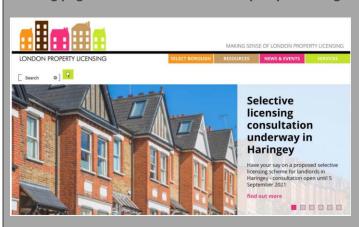
## Digital advert across various websites and platforms



#### Advert promoting the consultation extension on Twitter



#### Landing page advert on the London Property Licensing website



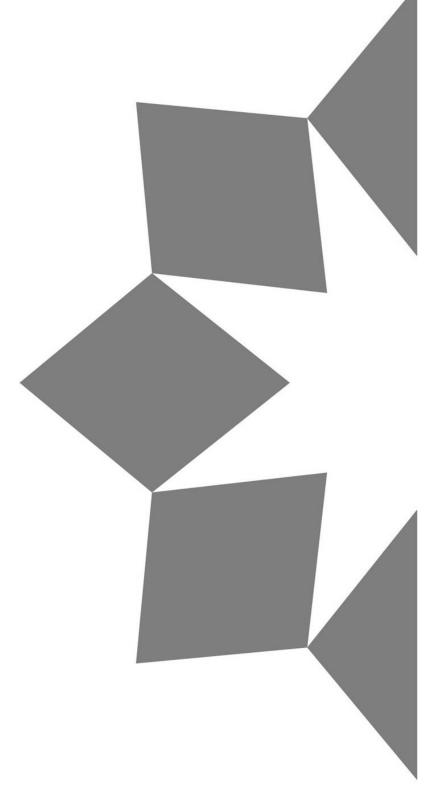
#### Digital banner advert displayed across various websites and platforms



#### Workshop advert on Facebook







# Appendix 5: Written responses to consultation (verbatim)

#### **London borough responses**

Response 1 (21/07/21)

Dear Stephen,

Re: Private Rented Property Licensing Schemes – London Borough of Enfield Consultation Response

Thank you for providing the opportunity to comment on your consultation to introduce a selective licensing schemes in the London Borough of Haringey.

Enfield Council supports the introduction of your proposed Selective Licensing scheme. We consider the proposed scheme will improve the conditions of private rented properties for your residents by resolving issues such as poor property conditions, poor property management and anti-social behaviour in areas of high deprivation.

Having reviewed the evidence, it clearly shows the need for licensing to improve standards in the private rented sector in Haringey. The evidence demonstrates that licensing has provided additional enforcement powers will help tackle these issues by requiring all landlords to sign up to licence conditions that help ensure they adopt a responsible approach to management of their properties and identify those landlords whose management arrangements are inadequate. We are of the view this could not be achieved by using existing powers alone. We consider the new proposals will continue to make improvements in Haringey's private rented sector by identifying those private rented properties that are managed ineffectively.

It is clear that if the proposed schemes were not adopted that this may limit the authority's ability to tackle compliance issues in a growing private rented sector.

Enfield believes that the private rented sector has an important role to play in the housing market. We consider licensing benefits both tenants and landlords. It can have a positive effect for landlords; from area improvements that potentially have a positive impact on property values and tenancy turnover. Tenants benefit from improved living conditions and better managed properties.

We consider that property standards and safety would be improved in Haringey's implementation of the proposed selective licensing scheme and will complement the additional licensing scheme that has already been introduced.

Yours sincerely.

Cllr Nesil Caliskan Leader of the Council

#### Response 2 (03/08/21)

Dear Stephen,

Thank you for inviting me to respond to your consultation in relation to proposals to introduce two selective licensing designations to cover 14 of Haringey's 19 wards. Please accept my apologies for the delay in getting back to you.

The London Borough of Havering, having recently made a selective licensing designation itself, is fully supportive of such a scheme to improve the management and standards in private rented sector homes and to reduce anti-social behaviour.

The current housing market is buoyant with increasing property prices and growing demand for homes to rent in the private sector, particularly across London, which can result in a ready supply of tenants who are willing to rent even the worst condition homes. Property licensing promotes better regulation of this sector and places greater responsibility upon landlords to not only manage the properties they let out better, but to also intervene as necessary to reduce anti-social behaviour caused by tenants.

Another great benefit of property licensing is to enable local authorities to carry out pro-active property inspections. This allows disrepair and hazards to be identified and addressed without the necessity for tenants to first make a complaint. Tenants who are living in the worst condition housing are often the most vulnerable and are also less likely to complain about poor living conditions for fear of retaliation or eviction by their landlord. Proactive property inspections will safeguard tenants from this form of retaliation

Most London authorities operate some form of property licensing scheme, which can only serve to improve the sector by driving out the rogue landlord element and encourage greater professionalism among landlords.

The Council is happy for you to include this letter of support with your application to MHCLG.

Kindest regards,

Damian

**Councillor Damian White** 

**Leader of Havering Council** 

**Ward Councillor for Squirrels Heath** 

#### Dear Mr McDonnell,

#### **Haringey Selective Licensing Consultation 2021**

Thank you for your letter of the 25<sup>th</sup> June 2021 seeking Newham's views on Haringey's private rented sector (PRS) discretionary licensing consultation, and I am responding on behalf of Mayor as lead cabinet member for Housing.

As well completing your online survey and informing our 25,000 private landlords concerning your proposals The Mayor of Newham would like to extend her support to your initiative to introduce selective licensing across most of the wards in your borough.

Here in Newham we will soon also be considering a further "3<sup>rd</sup> generation" application to Government for our own selective licensing scheme. Over the last 8 years we have found the framework of discretionary licensing across the PRS the most effective way to protect vulnerable PRS tenants as well as holding private landlords to account when needed. I am sure if you are able to secure the Secretary of State's consent Haringey tenants will also benefit from those protections provided by licensing rented homes. This will be of the utmost importance to all of us if we are to begin to address the devastating negative effects of this pandemic on our most vulnerable communities.

Yours sincerely

Cllr Shaban Mohammed

**Lead Member for Housing Services** 

Canning Town North Ward.

**Margaret Zincraft on Behalf of Councillor Mohammed** 

**Cabinet Support Officer** 

**Mayor's Office** 

**London Borough of Newham** 

#### **Landlord/Letting Agent/Managing Agent responses**

#### Response 4 (25/08/21)

Dear Sirs

We accidentally picked up a letter send to License Holder, xxx. An absolute miracle that were received this with the all the mistakes in the address and post code.

We currently hold licences in Haringey so should be on their database. In fact I am in regular email contact with Haringey Licensing team and have not been contacted by them in this regard.

I have in the past taken part in major consultations with London Councils. I find them a waste of time and money. While the council have a DUTY to consult, they do not have an obligation to implement the findings.

However I want to make my feelings clear.

Landlords have a duty to ensure that all properties they rent are safe and well maintained. Councils already have the authority to tackle low standard accommodation and take action against offenders. Clearly they are failing in their duty. Since the first lockdown officers have not been visiting properties where licensing applications have been made. Covid is the excuse given.

My concerns are that responsible landlords are being penalised financially in what is a hard time for landlords and forced to incur the cost of a license without any benefit whatsoever. If guidelines were more readily available to landlords then they would of course take note. A lot of of the issues relation to lack of maintenance is lack of enforcement action. From my many years of experiences in property management, the quality of properties on offer are of a good standard. Landlords who rent out sub standard properties are rate, in fact council managed properties are far more neglecting than those in the private rental sector.

I have no doubt that regardless of the result of the consolation selective licensing in the five wards mentioned in the letter is inevitable.

Kind Regards,

XXX

#### Response 5 (26/08/21)

Hi

I have recently had to apply for a selective license for my property in Enfield as their scheme starts in September and I have now received a letter from Haringey asking for my feedback on the new Selective Licensing scheme you are looking to release in the borough for Privately Rented properties, so I immediately visited your website to issue my feedback (<a href="https://www.haringey.gov.uk/propertylicensingconsultation">www.haringey.gov.uk/propertylicensingconsultation</a>).

My first concern is that the feedback you are requesting from me, is based on a pre-configured questionnaire which will direct me down a certain route.

Many of the questions I cannot answer with any sincere response based on my personal knowledge.

I can of course read the reports you have provided on the page and answer based on the information you have fed me, but that wouldn't be honest or fair feedback.

I know the Haringey borough well and have lived there and worked there in the past, much of what I have experienced is not as a result of the Private Rented sector, but a lack of investment & neglect from the local council and government over the decades.

Moving in poverty stricken families into the area then forcing them into the private rented sector instead of providing them with the social housing they need and deserve to give them stability of knowing they have a permanent home.

The private rented sector is just that, it's an individuals right to purchase additional properties with their hard-earned money and rent them out as business venture to earn an income from and generate some capital from as a long-term investment.

Why does the government now see landlords as targets to generate income from?

- Why does the government believe that they can tell landlords how much rent they can charge or how long they must rent for?
- Why does the government eviction process victimise landlords, even if they are not at fault?
- They don't with any other business, so is this fair?

I can understand a need to know which properties are privately rented in your borough, as this would be very useful information to have.

I can understand that you would like to eliminate certain behaviours by bettering the condition of properties, but this should apply to all tenanted properties NOT JUST PRIVATELY RENTED...

I can understand that this is an easy way to claim £600/property from each of your private landlords.

I recently had to apply for an HMO license for my property, which for the last 3 years, I haven't needed it as I have family living in my property, but I wasn't offered a refund for not needing it. I have not renewed the HMO license, but will now apparently require a selective license.

Selective licensing is just a new way to claw in some extra money from for the rest of the rented properties in your borough.

- I don't understand what you will be doing for the money, apart from updating a database.
  - o Will you be sending out inspectors to regularly check the registered properties?
- I don't understand how you will monitor who has applied and who hasn't, how will you enforce it?
  - Will you be scouring the property portals or speaking with local agents to provide you updated lists of properties that should be applying for licenses?
- I don't understand how this positively impact rented properties or remedy anti-social behaviour in the area.
  - Yes you will know whether they have smoke alarms
  - Yes you will know approximately how many tenants in each property (if the applicants don't lie).
  - Yes you will know the sizes of the rooms or whether they have a valid EPC, Gas & Electric certificate

#### But... how will that help?

The residents of Haringey (and all deprived boroughs nationwide) need stability, social housing, recreation for the youth, as well as simple things like food, heat & water.

With any property licensing, the government & councils always manage to word the requirements in such a way to conveniently exclude the properties owned and managed by you. "All properties in the area that are privately rented to single households (or two sharers) will need to have a licence to be legally let."

I don't see why this should be the case.

I have seen many council owned properties in bad states of repair or requiring maintenance.

I pride myself on providing properties that people are happy to live and call a home & react swiftly at the report of a problem, yet I am tarred with the same brush as landlords who abuse the system.

I hope this feedback helps and is taken into consideration.

Many thanks

XXX

#### Response 6 (02/09/21)

Dear Sir/Madam

First of all I have only just received this letter from Haringey Council with regards to the new proposed licensing scheme, please see attached, it was sent to the wrong address.

I object most strongly to the this new scheme, it is just another excuse to raise funds for the council which will not benefit anyone at all except create more bureaucracy for everyone concerned. I have run very successful HMO's in the borough for the last 20 years to a very good standard, yet every license renewal costs me money for minor petty improvements and renewal fees.

Bad landlords get away with providing poor accommodation and bringing in this policy will not change that, the council should put their efforts in to dealing with them rather than penalising good landlords. Haringey along with many councils are the worst culprits in not providing good accommodation. You only have to walk round any social housing developments to see this, Grenfell is a classic example of how poorly council tenants are treated.

XXX

#### Response 7 (03/09/21)

Sorry I wasn't able to fill in your online form. I am a committee member of the Haringey Leaseholders Association. We represent some 4,500 Right to Buy leaseholders in Haringey about a third of whom rent out their properties. So these people are in the PRS I believe.

I am also sending in my comments as an individual. There didn't seem to be any way to send these comments other than sending them to you. I hope you will take them into consideration.

#### (information from attachment)

LBH's proposal does not meet the conditions for selective licensing according to the legislation and the subsequent order.

First they have to show that there is a high proportion of PRS. They use the 19% figure for PRS in England as a benchmark but the relevant figure is the London figure which is 28% according to the English Housing Survey. They say that LBH is higher than this at 34% but that figure dates from 2018 so it is not up-to-date (p10 of the state of the borough document). Since then there has been Brexit and Covid so it could be very wrong. They also say that there are 44,000 PRS dwellings in the borough but this is an estimate derived from modelling from Metastreet. But there is no link to any information about how Metastreet reached their conclusions so we have no evidence to show that this figure is correct. Some of the data they are relying on goes back to the 2011 census. This is not relevant enough.

So they have not shown evidence that they meet this first condition.

Then they have to show that the areas affected meet at least one of several other possible conditions. On p14 of their report they suggest that almost all of the borough meets three conditions: poor housing, antisocial behaviour and deprivation and that five wards are excluded because they don't meet all three. But this is not how it works. If all the wards meet even one condition properly then all are eligible. Unless a condition is properly met by a ward it is not eligible at all. Sort-of meeting three conditions is not enough.

Poor housing: In order to meet this condition LBH have to show that there is a risk of health and safety hazards. But all they do is refer to a risk-based assessment from their Health and Safety system without showing us how this works. So this is unevidenced. What the hazards actually are is not said just that they are category 1. Nor have they carried out a review as required by the Order.

Anti-social behaviour: the evidence does not show that this is correlated with PRS. It is just asserted that levels are high but there is no comparison with complaints from the social sector for instance. It is likely that these would be much worse as PRS residents are happier than social tenants. LBH say that ASB is correlated with deprivation but the graph on page 12 shows that the most deprived area Northumberland Park has the lowest level of ASB problems in PRS and that Highgate has a relatively high rate despite having no deprivation. There is no consideration of whether certain ASB problems are not down to repeat offenders.

Moreover the main ASB problem seems to be poor waste disposal / fly-tipping but that is not enough of an issue to justify such a massive and draconian scheme. There are existing powers for dealing with this as LBH plan to do for the five excluded wards in the west of the borough.

Deprivation: since 2015 deprivation has been going down in Haringey according to the state of the borough report. Life expectancy is better than English average. Haringey does very well in education much better than the London average. Youth offending is down to poor parenting or the death of a parent not poor housing and anyway on p19 LBH admit that the scheme will not help with deprivation. But they have to be able to show that it will help with that to meet the strict conditions of selective licensing.

Additionally LBH are supposed to show that other steps they are taking are going to combine to make a difference but they haven't detailed any. Nor have they aderquately explained why the existing powers they have are not enough to deal with the main problem of litter / waste disposal. Basically this is a way for them to raise revenue that will be additional to existing resources for dealing with cleaning up the borough (and additionally other things). But that is a misuse of the scheme which is supposed to be specifically and carefully targeted. In addition it is not supposed to be automatically introduced for the maximum term of 5 years. Clearly this is something LBH want to have permanently in place. If they are going to do this they should start with something very local to see if it works in the areas worst affected. Some of the wards are not very highly deprived like Stroud Green or St Ann's or West Green. It is too broad-brush.

Moreover the scheme is likely to cause hardship by forcing rents up and leading to increased homelessness at a time when the economy is already struggling. The 600 fee is high and landlords will just put it on the rent.

LBH are seeking to deflect from the problems in the socially rented sector for which they have much more direct responsibility. P10 of the state of the borough report shows that the real story is the collapse of the social housing sector and the high rates of dissatisfaction within it. Between 2015 and 2018 the number of social tenants fell from 81k to 55k while PSR only increased by 17k. PSR are significantly happier than social tenants so most of the ASB seems to be coming from the socially rented sector and not from PSR.

This proposal shows an ideological bias against landlords. The HLA has a significant proportion of landlord leasholders (about one -third) so we should send in this contribution to the consultation.

#### Response 8 (04/09/21)

**Dear Gavin Douglas** 

We feel that the propsed extra licencing is unnecessary as most properties with couples or families generally look after the proeprty themselves including early reporting of any problems. As it's their home, they have a need to keep us informed. HMO have a didn't mindset as the communal parts are generally less of a concern to each indiviual tenant. With that said our properties are very well looked after by both HMO and private family tenants. Thereffore this seems like another money making scheme where prosicution of rogue landlords would not penalise us all. We want all properties in LOndon and even the UK fit for purpose and would like all tenants to live in quality accommodation but the councils need to target landlords that break the law and stop creating new costs for us. We have seen the admin fees disappear without a consulation and mortgage relief also.

Regards

XXXX

#### Response 9 (05/09/21)

**HLA (Haringey Leaseholders Association)** 

LBH's proposal does not meet the conditions for selective licensing according to the legislation and the subsequent order.

First they have to show that there is a high proportion of PRS. They use the 19% figure for PRS in England as a benchmark but the relevant figure is the London figure which is 28% according to the English Housing Survey. They say that LBH is higher than this at 34% but that figure dates from 2018 so it is not up-to-date (p10 of the state of the borough document). Since then there has been Brexit and Covid so it could be very wrong. They also say that there are 44,000 PRS dwellings in the borough but this is an estimate derived from modelling from Metastreet. But there is no link to any information about how Metastreet reached their conclusions so we have no evidence to show that this figure is correct. Some of the data they are relying on goes back to the 2011 census. This is not relevant enough.

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Park has the lowest level of ASB problems in PRS and that Highgate has a relatively high rate despite having no deprivation. There is no consideration of whether certain ASB problems are not down to repeat offenders.

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Additionally LBH are supposed to show that other steps they are taking are going to combine to make a difference but they haven't detailed any. Nor have they aderquately explained why the existing powers they have are not enough to deal with the main problem of litter / waste disposal. Basically this is a way for them to raise revenue that will be additional to existing resources for dealing with cleaning up the borough (and additionally other things). But that is a misuse of the scheme which is supposed to be specifically and carefully targeted. In addition it is not supposed to be automatically introduced for the maximum term of 5 years. Clearly this is something LBH want to have permanently in place. If they are going to do this they should start with something very local to see if it works in the areas worst affected. Some of the wards are not very highly deprived like Stroud Green or St Ann's or West Green. It is too broad-brush.

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This proposal shows an ideological bias against landlords. The HLA has a significant proportion of landlord leasholders (about one -third) so we should send in this contribution to the consultation.

**Individual responses** 

Response 10 (01/07/21)

#### **Dear Private Sector Housing Team**

#### **Reference: Selective Property Licensing Consultation**

I refer to your letter dated 23rd June 2021 a copy of which is attached.

You made an incorrect assumption that I am a tenant in private rented accommodation in Haringey. I am a private tenant. I rent in the county of Herefordshire. I own property in London, and these are professionally let to tenants by my agents.

You have requested my views about selective property licensing for your consultation. In my opinion as a tenant in the private housing, the private sector works well and landlords follow good market practices set by government and many laws updated regularly, e.g., recent regulatory requirements to certify electrical installations in both private and public sector rental properties are safe. There has been an increase in fire safety following the Grenfell disaster. Councils throughout the UK must work harder to improve fire safety. As a council, you must focus on improving the Haringey Homes public sector housing stock. Therefore, as a council you must not inflict selective property licensing on a private sector market that works. This would simply be another tax for private sector landlords to pay.

#### Yours faithfully

#### Response 11 (05/07/21)

Dear Mr Malcolm,

I should like to comment upon Haringey's proposal to introduce a selective property licensing scheme. I have tried participating in the consultation exercise via the council's website. However, it turned out to be a box-ticking exercise, and the questions were irrelevant to the comments I have to make. I am, therefore, sending this email instead.

I should add that I am writing on behalf of my son who is the owner of the xx floor flat at xxxx N4. To be precise, my son owns the lease, and Haringey the freehold of the building. I have a financial interest in the flat. I am therefore, I believe, qualified to send this comment.

Anyway, my comment is as follows.

It is, of course, only right that Haringey should be taking steps to ensure that privately owned accommodation in buildings for which they own the freehold meets an acceptable standard. It's obvious, too, that landlords have a responsibility for keeping their property in good repair. However, it is a responsibility which runs two ways, for the council itself has a responsibility for ensuring that buildings they own freehold are maintained in good condition. It is my view, then, that any license should specify penalties to be incurred by the council should it fail to meet its own responsibilities. I assume these would be financial penalties.

My reason for emphasising the point is that I am only too aware of how negligent the council can be, having experienced the council's half-hearted attempts, spanning a spanning a period of ten years, to deal

with the problem of water leaking into the flat at xxx from the flat above. (Actually, I gather that the problem has now been fixed, - but for how long?)

Yours Sincerely,

XXX

#### Response 12 (13/07/21)

This has recently been brought to my attention. I live in Bounds Green and was very surprised to see Bounds Green among the 14 proposed areas. Where does it sit in the English Indices of Deprivation 2019?

Xxx

#### Response 13 (16/07/21)

.... I can't attend today's meeting as I am working. I teach so I'm not able to stop and join a meeting. I would like my view to be represented that I don't believe antisocial behaviour is such a problem in my ward- West green and I think it is social tenants who cause the most trouble. Not small flats with professional couples - who make up tenants in properties that aren't HMO.

I may be free next Wednesday depending on my timetable.

To me this seems like the council making money and taking advantage of their position.

Kind regards,

XXX

#### Response 14 (23/07/21)

Had a letter requesting feedback re licencing scheme.

Sounds like another level of bureaucracy and administration being implemented by the council rather than common sense use of the council's time. I am sure that there will already be legislation in place to prevent people littering and preventing anti social behaviour, both tenanted and owned properties it is not the tenants fault it is the people with low social cohesion. If the time was spent by the council creating a sense of community by fostering a sense of community rather than grabbing money from landlords through licencing or running events it would be a better place to live. What about creating more local markets or providing better street cleaning services / dealing with the homeless near the sainsburys superstore?

Licencing will only reduce the number of landlords / up their costs which ups the costs to tenants.

#### Response 15 (24/07/21)

Dear Lynn Sellar,

Thank you for your letter dated July 2021 inviting the Tenants of the property to participate in the Selective Property Licencing Scheme survey.

There are no private tenants at xxx at this time and it's rather concerning you have been led to believe by Haringey Council that there are.

In my honest opinion and from my experience dealing with the council over the years, I can tell you that Haringey Council as an entity is dysfunctional, unreliable, disorganised, corrupt, vindictive and just outright cruel, much like the current government.

Requiring landlords to obtain a licence from Haringey Council before renting their properties sounds like a power & money grab to me, and is in my opinion the worst idea since the inception of Low Traffic Neighbourhoods. Current legilsation and regulation already give the council too much power (and not just with regard to private property) which they, the Council frequently abuse to the detriment of residents. Giving this Council more power is frankly irresponsible and unwise, and I am firmly against this scheme (or any other scheme which gives this Council more power - see previous paragraph).

If the Council really wanted to improve anything in the borough, they could provide new & **improve existing services**, as opposed to provide **governance** and seek more **powers to control** which this scheme clearly aims to do.

In order to achieve improvement of any kind however, empathy, understanding, hard work, altruism and a move away from the Councils current **corporate disposition** would be required (growing a heart would be a good start).

You may or may not wish to include this opinion in your survey - the choice is entirely up to you - but I kindly ask that you remove this property from your list of properties housing private tenants.

Yours Sincerely,

Xxx

#### Response 16 (24/07/2021)

As a landlord I'm highly supportive of a licensing scheme - for all landlords, not just landlords of HMOs. It would set clear guidelines for me and tenants, and reassure my tenants about the experience they should expect.

Hope that's helpful!

All the best,

XXX

#### Response 17 (24/07/2021)

Dear Madams/Sirs if Haringey council,

We received on Friday 23rd July 2021 the attached letter to inform us of a consultation on a "Licensing scheme for landlords in Haringey".

We have been renting this property for the last 3 years and we would not be in favour of this Licensing Scheme in Haringey to becime effective.

Yours sincerely

XXX

#### Response 18 (25/07/21)

Dear Sir or Madam,

I am insufficiently informed about conditions in other parts of the Borough to complete the questionnaire. I live in privately rented accommodation in xxx, a small 1930s purpose-built block of 14 flats in the Highgate ward (postcode xxx). I am generally satisfied with the management of the block. My only real complaint is about the rent increases, which take place every two years and which invariably exceed the rate of inflation.

Yours sincerely,

XXX

#### Response 19 (25/07/21)

Haringey initially said they would introduce selective licencing in fortis green Northwood n6 and n10

The affluent residents objected and this did not go-ahead

they are now dividing the borough as a rich man poor man zone rather than treat all the residents fairly and unify the borough

very few people can afford to buy property in n10 n6 and n8 and ally pally n22

Ally pally is the sister borough of Bowes park, this is victimisation at its worst

avoid being subjective and either introduce selective licencing boroughwide or not at all

there are numerous sole occupancy studios with youngsters paying £100 per month council tax and yet mansions in highgate pay £ 250 PCM

this is another injustice, so the income from a studio flat with a single occupant will generate  $\pounds$  1100 for licencing and £1000 for council tax only in the area that is victimised the rents will undoubtedly increase .

these studios help youngsters work from home safely and not spread the virus in shared offices and undergrounds and buses.

and all the mansions in the affluent areas with numerous studio conversions will be exempt from the £1100 licencing fee

i hope they will treat the entire borough fairly, it has also been observed ith planning, if the affluent object it does not go through. Haringey love segregating the residents rather than levelling the disparity between comprehensive and Pvt school areas.

see this is very important to take a lesson from mother nature as with the pandemic and floods and level out the disparities, Haringey workers are the best, i hope the politicians will see that consistency is required

#### Response 20 (from same respondent as 19) (23/08/21)

The graphs show that bounds green has low levels of ASB compared to Hornsey and crouch end

there is no evidence to state that residents live in substandard accommodation

Tenants are moving out of London as it is cheaper with WFH to live outside London and work remotely

until such time that the entire borough/ country is subject to selective licencing, I would urge the council to remove bounds green ward from the list as there is a danger that it will become a ghost wars as more and more tenants move out of London. landlords will use this as an excuse to put up the rent in what is effectively a clean well rin sister ward to Ally Pally

we have lovely restaurants like the vrisaki and Middleton road won an award for best Sunday market., hairdressers all run by dare i say immigrants the same as Muswell hill fortis green and Hornsey park lane Northwood hall n6

i have lived here since 1969 and i have not taken kindly to the fact that the council has ignored that the ASB is on par with the elite crouch end i

i will write to the minister and the mayor to either introduce selective licencing to the whole borough or employ someone to revisit the criteria by

inspecting all the properties in Haringey to check the quality of housing, and whether immigrants indulge in antisovial behaviour

it is astonishing to say bounds green has immigrants, most of the shops and landlords are Greek and as a nation, they have very high standards in respect of managing their rented properties and restaurants, dry cleaners, hairdressers et

Does this mean that if the Afghan Asylum seekers settle in Muswell hill the area will be tarnished with the same brush as bounds green.?

i cannot believe a lovely borough like Haringey is insinuating that immigrants and Asylum seekers bring housing and letting standards down, , if the stats for asbo exclude housing association tenants, bounds green would be the best ward in the borough.

please please reconsider and exclude bounds green lest we become the Bronx of Haringey!!

#### Response 21 (24/07/21)

Dear Eldridge,

I hope you are well.

I have just filled in the consultation. Although I don't believe we are affected as we are an owner occupier landlord. However, I am making a number of points which are summarised below:

#### Start:

I live on one of these wards and haven't witnessed any antisocial behaviour by residents. I can only speak for myself. A government report\* in 2014 found poverty (particularly child poverty) and homelessness is driven by family breakdown so supporting marriages would make more difference than landlord licensing which will drive up the cost for everyone for the sake of weeding out a 'minority of criminal landlords'. Unfortunately, Haringey planning and building control is not very responsive. I'm still waiting for an answer to an querry I submitted a couple of months ago - in the meantime, the maintenance problem is getting worse.

I didn't see any evidence in the (landlord licensing) report that those areas that have used landlord licensing have benefitted from more satisfied and better behaved tenants. The landlord licensing scheme in Liverpool was discontinued after running for 5 years for eg: there weren't many tenant accommodation complaints. Plus the council already has powers to regulate housing safety and public disturbance (building regs, landlord electricity/gas certs etc).

With the shortage of (social) housing in the borough, the council should be finding ways of attracting more landlords / supporting them not deterring them. If you have held voluntary sessions which don't have a good take up, maybe you are not doing it right. Maybe consult the target group about what support would help them to improve.

Stop

blessings

XXXX

\* Cm\_8781\_Child\_Poverty\_Evidence\_Review\_Print pp 26, 27, 63 (or put in search 'marriage')

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/2853 89/Cm 8781 Child Poverty Evidence Review Print.pdf

#### Response 22 (from same respondent as 21) (25/07/21)

Dear Eldridge,

I've had a look at most of the docs relating to this proposal.

As this landlord license concept is **concerned mainly with problem tenants** and the issues they cause in neighbourhoods ('management' rather than 'property maintenance'- since property maintenance/ safety is already legislated by building regs etc) and the ability of landlords to keep the problem of ASB tenants under control, I would suggest the best way to support landlords in this is to make it easy for them to evict antisocial tenants.

From what happened to us, you have an idea that no landlord wants to have problem tenants, but once this has happened, what can be done to 'evict' them. You saw how hard it was for us and this was with our dear lady who the council had sent to us and even the officers had difficulty moving her on - how on earth can landlords do any better?

A landlord license doesn't even attempt to tackle this juggernaut of a problem. My suggestion is that the council needs to use its powers to 'support' landlords to evict ASB tenants - this is a win win for neighbourhoods and a win win for landlords.

Blessings

#### Response 23 (25/07/21)

Dear Sir/Madam,

Thank you for your recent communication regarding the above mention scheme.

I am not a tenant and my family have owned this house since 1974. However, I would like to comment on the scheme as both xxx and xxx are privately rented HMOs.

I think your licensing scheme is a good idea for many reasons. Some of the rented properties on my house and in appalling condition, but people live there as it's cheap.

Without mentioning the specific property on xxx Avenue, earlier this year a mother of four almost lost her life and the lives of her children and the smoke alarm was faulty and a fire started on the stairs. Her children managed to get out and she didn't. Thankfully observant neighbours saw the children on the streets, called 999 and were able to get help. The mother assumed all four kids had died and the children assumed their mother had died. It was very emotional.

The landlord was aware the smoke alarm didn't work, it was hanging from the ceiling, as proof he had a smoke alarm. This was very careless.

Again, I will not mention the house number on this road, a group of tenants living on xxx Avenue always put the wrong rubbish in their bins, not because they don't understand or cannot read/write, but because they can and they don't care. When their rubbish isn't collected, they place it at the top of the road. They also place unwanted furniture there too. Now other households have seen this and now do the same. The top of our road, across the road from xxx Mini Mart has become the local dump. It's disgusting.

Also, I feel a lot of landlords scrap the bottom of the barrel to find tenants, rather than observing the area and finding suitable tenants. It's frustrating. We have a lot of anti-social behaviour for this reason. They don't live locally and they assume it's only Tottenham so they put all sorts of unsuitable characters here.

We have constant loud music, feral behaviour, excessive street rubbish and much more, because landlords are greedy for the rent.

There is also a lot of overcrowding. It's unbelievable. I've observed so many pest control vans visit my road often, it's disgusting.

Tottenham needs a revamp and it won't get that until landlords start renting to better tenants. Whilst scraping the bottom of the barrel is appealing, as it's quick occupancy, therefore quick rent. They do not consider the impact of their tenants on the current setup/environment.

Regards

XXX

#### Response 24 (26/07/21)

Dear Sir/Madam,

I received a letter in the post regarding the proposed Selective Property Licensing Scheme over the weekend, and I would just like to register my opposition not just to the proposal but also to the way the consultation is being carried out.

- First of all, I would like to know why only Tenants are being sent letters to provide feedback on the proposed licensing scheme, since Landlords would be the parties responsible for paying for licensing and bearing the license conditions?? I would like to register such a method of consultation as extremely unfair to Landlords and unbalanced in favour of tenants who of course are most likely to respond in favour of licensing since they would not be bearing the costs of licensing and likely are not aware or interested in long-term consequences which would likely negatively affect the private rental market.
- Secondly, I would like to express opposition to any proposed landlord licensing scheme in Haringey
  and attempting to make Landlords responsible for illegal dumping of rubbish and antisocial
  behaviour. These are offences which the Council and Police should be directly responsible for, not
  Landlords who should only be responsible for ensuring their properties are well-maintained. I find
  it utterly cynical and disgraceful that the Council is attempting to shift their responsibilities in law
  enforcement and waste management to Landlords in a scheme which would likely backfire longterm as Landlords decide to sell their properties, evict their tenants, and also pass on higher rents
  due to licensing.
- Thirdly, I should like to enquire whether the proposed licensing scheme would also include short holiday letting such as via AirBNB or homeowners who may let out a room in their home?

The majority of landlords take on huge financial risks as it is when letting out a property since they often suffer default of rental payments, high repair bills, mortgage debt, and fraudsters or bad tenants who leave rental properties in shambles for landlords to clean up and repair. Yet the weight of the law remains heavily in favour of tenant rights at the expense of private landlords, who the government and local councils are keen to take advantage of and tax like money cows.

I certainly hope that this proposed landlord licensing scheme does not pass, though in my experience the fact that it has reached this point suggests strongly to me that results of the consultation will likely mean little since Haringey is likely already set on approving their proposed licensing scheme.

I have therefore placed my rental property back on the market for sale today.

Yours,

XXX

#### Response 25 (26/07/21)

Lynn Sellar - Private sector Housing Team,

Hope this email finds you well.

I have received a letter Ref: Selective Property Licencing Consultation.

The letter was refer to the tenant living the property but we are the owner of the property of xxx N15 since 2004.

I have filled in your online survey though decided to also send you an email explaining some of the problems of private landlords in our road and anti social behaviour, and noise.

We have lived here very happily until 2018 as quiet neighbourhood of 2 bedroom maisonette. ( Max occupancy of 2 -3 )

Our side of the street are Privately owned but the situation start to change since the winter of 2018.

One night in 2018 a few people moved in the middle of the night (after 00:00) to No xxx.

They blacked out windows and added Ventilators on the window of both front and rear of the house.

We have lost a track of how many people living in the house as every day different people were in and out all day, one time we counted 7 people (including a young child and a dog)

**No xxx** Start to have a loud Cheer and banging table / wall and stamping the floor (playing cards or some sort of betting behaviour) every evening after 23:00 until early in the morning of 07:00.

We informed to be quiet but did not change just got worse.

2019 Christmas eve, their behaviour got worse and we had to call the Police.

Also during lockdown they had a BBQ Party with more than 15 people in the garden ( do not know how many in the house ).

Based on their strict religious rules being, Orthodox Jewish Men, I cannot believe they watch Violent movies with guns and swearing in high volume....

One of their loft hatch is open all day 365 days with thunderstorm / Freezing weather this behaviour puzzles us.

Recently, our shared Leaseholder **No xxx** decided to move out from London and start to rent the property.

We had a great relationship with previous tenants, until this year April 2021, the tenants moved out due to ASB (Anti-Social Behaviour) of No xxx (their next door neighbours)

Owner of No xxx decided to use Property Agent (Cousins) who told me in person the people who is going to move in are working for Haringey council.

We are so please but it was not quite true....

The new tenants moved in with loud music with so many people.

We have posted several ASB (Anti-Social Behaviour) to Haringey Council due to Noise Nuisance ( A amplifier with Mariachi Band ) and illegal dumping ( even translated how to recycle in Spanish/ Colombian language )

We do not know who and how many people actually living below us now.

As well as this problems of tenants of the rented property,

Parked cars with Car Alarm going off a day and a night.

Several parked scooters in the area run by several families (xxx road / xxx Road) for deliveries stand outside gathering talking and beeping (very loud). does not feel safe area anymore, as so many private landlords renting small maisonettes houses to large noisy Columbian families, with massive overcrowding problems and anti social behaviour.

Makes working from home very hard to concentrate and hard to relax in the evenings and the weekends.

**Your Sincelerey** 

#### Response 26 (28/07/21)

Good evening? Thank you for you for the letter you posted to my address.

First of all this is a very good decision you have made. So far so good it is very important to involve the landlord as well to take whole responsibility of their property from homeless people who come into the flats corridors to sleep, drink and do smoke weed in our building.

We have young children and this is very unsafe for me and my children.

Kind regards

Xxxx

#### Response 27 (31/07/21)

dear lynn sellar

I received your standard letter and as I have all sorts of problems getting the landlord to do the most basic repairs I would like some info who could help me deal with it etc. Main problem is draughty old fashioned windows and it is impossible to heat it goes straight out and I have come up in the morning to 5C in the winter. I would like to add my voice to the various issues you are trying to tacke.

kind regards

xxx

#### Response 28 (01/08/21)

#### Licensing for privately rented properties

Dear Sir/Madame,

My name is xxxx and I am a private tenant within Haringey borough. I have received a letter about consultation for licensing of privately rented properties.

I would like to suggest few points about this matter:

- 1) The price of the licence will be passed onto tenants via rent increase.
- 2) xxxxxxxx
- 3) It will negatively affect people from the poorest background, as it stands, it is already hard to find privately rented properties for people on state benefits and it will make it even more challenging.
- 4) It will not stop illegal rental but will make it easier to be tracked down.

Kind regards,

xxx

#### Response 29 (01/08/21)

Dear Miss sallar,

You been living to this address

for 13 years. I have no problem

with my landord, they provide

me anything I need. I'm happy

at this address, they consiment

near bus stop, shops, dentist my

surgery is in Philip kame.

I'm IT yes add. I got asthma

and heart deseast, I'm fine

no problem with other tenants

win happy with my landord.

If hope this will help you with

your survey.

your sinessly

#### Response 30 (02/08/21)

Dear Ms Sellar

#### Proposed selective property licensing scheme

I've received the Council's letter, addressed to me as "The Tenant", about the proposed property licensing scheme. Although I've responded to the online questionnaire, I had additional questions that I'd be grateful if you'd answer.

#### Anti-social behaviour (ASB)

Supporting documents on the Council website suggest a strong correlation between private rented property and anti-social behaviour, but seem to offer no evidence for this being a greater problem than in Council or housing association properties, for instance. What's the evidence for this assertion and are there any ASB statistics for non-privately rented property?

#### Screening and enforcement

The proposal gives no information about how the Council intends to assess licence applications (especially in terms of an applicant's fitness to be a licensee): does it include compulsory inspection of all private

properties, or financial or credit checks and examination of rental agreements? What are the criteria for refusal and will there be an appeal process? Or does licensing effectively depend on self-certification that all conditions are being met?

Crucially, there's no information on enforcement measures after a licence is granted. As the scheme and licences would last for five years, how will the Council continue to monitor and check that licence conditions are still being fulfilled after the initial application is made? Will there be annual inspections of all rented property across the whole borough to ensure that, for instance, smoke alarms are still working or that repairs are being done? What sanctions are proposed for landlords found to be in breach of their licence, over and above measures already available to the Council? (The background documents argue that these are too difficult, expensive and time-consuming to enforce.) Can a licence be revoked and what sanctions are there to prevent a landlord without one renting out a property anyway?

#### Identification of properties and consultation

As I said above, the letter I received was addressed to me as "The Tenant", despite the fact that I've owned my flat for over thirty years. I realise the letter is a circular, but this suggests that the Council cannot accurately distinguish privately rented properties from those such as mine that are owner-occupied. The letter specifically asks for tenants' views, so how are private landlords being consulted?

#### **Fees**

The proposed fee structure shows discounts for early registration and for landlords registered with a "recognised accreditation scheme". There's no list of such schemes in the proposals and, given my previous point about property identification, how are landlords supposed to know about either discount? How will the Council check accreditation?

Licences are to be issued for a five-year term under a scheme that only lasts five years, but no fees are shown for new landlords applying in years two - five. Will a potential landlord in, say, year three have to pay £600 for a licence only lasting two years? This looks like a major disincentive to applying for a licence after the start of the scheme and likely to lead to increasing evasion or failure to register as time goes by.

#### **Overall proposals**

I understand the problems of poor-quality, badly-maintained properties and exploitative landlords in Haringey and see why a licensing scheme is attractive to the Council. But an effective scheme needs enforcement and sanctions, both of which the published proposal lacks. If the scheme relies on landlords self-referring, it's highly likely that "good" landlords will register while "bad" ones will continue as at present, knowing they won't be caught. If enforcement relies solely on complaints by tenants or neighbours, it's hard to see it as any improvement on existing systems which the Council says hinder it in taking action.

As it happens I also rent out a separate flat in my house (as an owner-occupier I'd presumably be exempt from licensing); the conditions shown in the consultation documents are all included in my existing tenancy agreements and the contract with the letting agents I use, both of which are already legally enforceable, so licensing seems to add little if anything to this. LB Haringey appears to have no way of identifying my dual role as both a property owner and landlord in the same building and I believe this and the other queries above undermine the premise of the licensing scheme as currently proposed.

I'd therefore be grateful for your responses to the points and questions I've raised and look forward to hearing from you shortly.

#### Response 31 (03/08/21)

Dear Sir/Madam,

In response to the Property Licensing consultation, I wanted to ask how it would actually benefit the area? The only things stated on Haringey's page is that they believe it would benefit the area... by simply charging landlords more money... What I want to know is - what exactly does this money go towards? Simply stating that it would help 'support' landlords understand their responsibility is an absolute farce of an excuse. There's the internet that can help people understand responsibilities. HMO's are charged fees already and now there's a proposal of any type of private rented sector... by the same people who also want to help the so-called lay person with their rents. It's ridiculous if some of these charges don't get passed on to the tenants so thus driving the rental costs up.

Obviously all this does is decrease any profit made by the landlords who sign up to the scheme - who are probably the ones who run them properly; which in turn makes it difficult for the landlords to reinvest in properties to help the upkeep unless they increase rents in line with the fees (which goes back to the cost continues back to the tenant... in a time re: covid - is this really socially ethical and morally right with the loss of jobs?) With charges left, right and centre, I really wonder what the actual intention is; To gentrify the area? To diminish all possibility for people who don't want the large bills of having to pay for an apartment or whole house... so therefore fazing out possibilities for people to save money by renting by the room??

Clarification needs to be made on the following;

- -Do licensed HMO's get charged a second fee with this new licensing?
- -What does the money actually go towards?
- -What would happen if a property is not well looked after what does the council actually do?
- -Where is the actual local support for landlords when tenants are being difficult?
- -What about people who are renting rooms in their home is the same needed there?

Personally, I feel this needs to go back to the drawing board. My personal experience to date is that landlords have been brilliant because I choose a property that looks well kept.

Regards,

 $\mathbf{X}\mathbf{X}\mathbf{X}$ 

#### Response 32 (04/08/21)

I have a property in Crouch End which I rent out. I do not agree with your proposal to license landlords, as it adds a further layer of cost and burden onto the good landlords who always take the blame for a small unscrupulous minority of rogue Landlords. This ultimately puts the rent up to tenants. You should instead, create a system whereby dissatisfied tenants can make direct representation to the Council to have their situation investigated.

In other words, don't penalise the many because of the few. There are more equitable ways of dealing with this problem.

#### Response 33 (09/08/21)

Dear Sirs,

IP write oin respect of your consultation that is taking place. I am a property solicitor with numerous years experience. I am passionate about the local communities and feel that there are numerous arrears of improvement which the landlord are ignoring to take into consideration. As a tenant of a private landlord i feel that landlord are frankly getting away with murder.

They are getting penalised and being held to account as they should be as evidenced by the Grenfell tower disaster. Although various consultation are taking place the tenants lives are being put at risk due to the lack of response of some of the employees of the public and private sector.

Areas of improve are firesafety standers, lack of improvement of housing disrepair building in both public and private sector, lack of legal representation and advise for those with substantial disrepair needs access to support as a private tenant my landlord often fails to stick to appointments, he targets people who are muslims and has others who work for him with his employees. Arears of outstanding repair are such as firesafety regulay checks, lack of electrical checks, poor water quality, dry rot, black mold, damp, poor water quality and pressure, lack of recycling, building repairs, cheap materials and substandard contractors which landlord only wishes to pay at minumum price and for minimal hours. lack of planning and asbestos control, lack of insullation, damp and cracks throughout both vertical and horizontal. A very cocky and non shoddy landlord who has the support of other officals in the public sector who do not wish to carry out works as they have said they dispose of people and use public spending for there own use. They bully employees and we as tenants suffer.

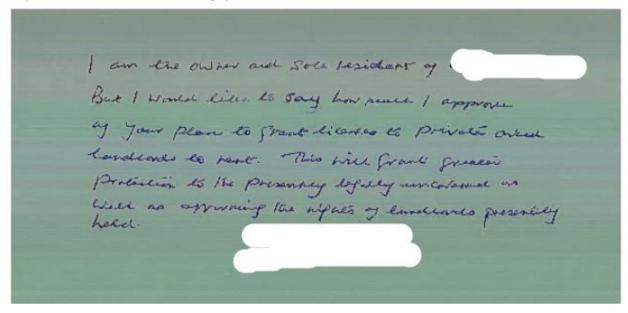
I am sorry for delay in sending this but was in accident and emergency due to head injury and various other islamophobic injuries sustained due to the systematic targetting of these thugs.

Kind regards xxxx

#### Response 34 (received from Haringey on 13/08/21)

E HO	10.22 0112
107-17-1	Dear Strl Madam,
0	Do NOT have a
100	Noperty licensing scheme for anyone in
	harrigely since you are just abusine
-	at me so do not approach
	my home EVER Do not have a
	liceway schene for any landlord
Mary A	in the brough in case you alrest
Et an	them Jalso, Have Jel FREE
	for landbord and tenant untitled your
	control one then as you will in
0	just say it wrong all then and the
	Houseako do NOT evit my in too-4
- 15-10	
	make mensamous tenant, ever oo not
10-	yours fouthfully

#### Response 35 (received from Haringey on 13/08/21)



#### Response 36 (25/08/21)

Dear xxx

I hope you are keeping well.

I wasn't sure which officers to contact about this but there is a property licensing consultation going on at the moment. Letters have been sent to properties in the Miltons and Archway Road. However when you click onto the consultation survey Highgate is not listed as one of the wards which are being consulted on. This is causing some confusion.

Has Highgate been missed off the survey list or have letters been sent in error.

I would like to strongly lobby for the Miltons and Archway Rd to be included. We have many very poor quality private rental flats, very transient residents, and a high rate of anti-social behaviour and repeated bin contamination.

I look forward to hearing from you.

Kind regards

XXX