

# Additional HMO Licensing Scheme 2024-2029

# Appendix 4

# **Consultation Findings Report.**



**Consultation on additional licensing of private rented property in Haringey** 

**Haringey Council** 

Draft report February 2024



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## **Project details and acknowledgements**

Title	Consultation on additional licensing of private rented properties in Haringey
Client	Haringey Council
Project number	23222
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M·E·L Research would like to thank Haringey Council for their support with the consultation. We would also like to thank residents, tenants, landlords, agents and stakeholders for taking part in the consultation.

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 new borough-wide additional licensing scheme in Haringey.

The consultation ran for 11 weeks from 27<sup>th</sup> November 2023 to 12<sup>th</sup> February 2024 and sought to gather local views on the proposals, including the proposed licensing conditions, fees, variations to the licence, and alternatives that the Council could consider. The Council commissioned M·E·L Research, as an independent research consultancy, to deliver the consultation survey and independently analyse and interpret the results.

The consultation also looked at respondents' experiences of HMOs, accommodation and maintenance of private rented properties in the borough.

A variety of consultation methods were used to allow interested parties to share their views on the proposals. These included an online survey, 3 public workshops (2 online and 1 in person took place, although a further session was offered), stakeholder interviews, a freephone number for verbal feedback or to request a paper copy of the survey, 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 328 survey responses. 21 people attended three public workshops. Six stakeholders were interviewed. Finally, 13 individuals or organisations responded with written submissions to the consultation.

## **Key findings**

#### Additional Licensing scheme proposals

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

	Overall	Residents	Private tenants	Landlords /agents	Other
Base	328	67	35	178	48
Agree with the proposal for renewing the additional licensing scheme	47%	84%	37%	26%	79%
Disagree with the proposal for renewing the additional licensing scheme	45%	10%	54%	66%	8%
Agree the proposed conditions will improve the quality, standards and management of HMOs	50%	85%	34%	30%	85%
Disagree the proposed conditions will improve the quality, standards and management of HMOs	40%	7%	49%	60%	6%
Agree the proposed licence fee of £1,331 for a 5- year licence is reasonable	29%	55%	26%	10%	67%
Disagree the proposed licence fee of £1,331 for a 5-year licence is reasonable	58%	25%	66%	80%	13%
Agree the licence period should be reduced if there is evidence for officers to do so	52%	85%	37%	36%	77%
Disagree the licence period should be reduced if there is evidence for officers to do so	27%	6%	31%	39%	10%

NB. Where people identified themselves as belonging to more than one group (such as owner occupiers, private tenant etc...), we have assigned respondents to one principal group (prioritised by private tenants first, followed by landlords, agents, owner occupiers, social housing tenants and then by businesses in Haringey, and 'other'). Therefore the base sizes are lower than those shown in Table 4. There were then grouped into smaller categories presented in the table above and throughout the survey,

The proposal for renewing the additional licensing scheme was supported by just under half of respondents who took part in the survey (47%). A similar proportion (45%) disagreed with the proposal, with most of these (37%) strongly disagreeing.

The proposal received higher levels of support from residents (84%) and other respondents (79%). Landlords/agents and private tenants were more likely to disagree with the proposal (66% and 54% respectively).

Overall, half of respondents (50%) **agreed that the proposed licensing scheme conditions would lead to an improvement in the quality, standards and management of HMOs**. However, 40% did not believe that the conditions would lead to an improvement, with most of these respondents (30%) strongly disagreeing. Agreement that the licensing conditions would lead to an improvement was higher among other respondents and residents (both 85% in agreement). Greater levels of disagreement were found amongst landlords/agents (60%) and private tenants (49%).

When asked questions relating to **proposed conditions around property management**, the majority of respondents viewed the proposals as reasonable:

- 85% viewed the requirement for landlords to ensure that any repair or improvement work or pest treatment is to be undertaken by a competent person as reasonable.
- 79% viewed the requirement for landlords to ensure that that the exterior of the HMO is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly as reasonable.
- 74% viewed the requirement for landlords to take quicker action when complaints are made by tenants as reasonable.
- 72% viewed the requirement for landlords to ensure that that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only as reasonable.

Support for each of the four elements of the proposed conditions was higher amongst residents and other respondents.

When asked questions relating to **proposed conditions around waste management**, **again** the majority of respondents viewed the proposals as reasonable:

- 79% viewed the requirement for landlords to make sure that tenants are provided with adequate facilities for the disposal of refuse and recycling as reasonable.
- 75% viewed the requirement for landlords to make sure that regular checks are carried out to ensure that the common areas, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities as reasonable.
- 72% viewed the requirement for landlords to make sure that new tenants are, within 21 days of the start of their occupation, given information on waste and recycling as reasonable.
- 69% viewed the requirement for landlords to make sure that old furniture, bedding, rubbish or refuse from the HMO is not left on, or immediately outside, the HMO or private land as reasonable.
- 69% viewed the requirement for landlords to make sure that any type of waste which the Authority does not routinely collect, such as hazardous waste is disposed of in a safe and lawful manner as reasonable.
- 67% viewed the requirement for landlords to make sure that waste such as old furniture, bedding, rubbish or refuse from the HMO is not left outside the HMO or in its vicinity as reasonable.

Support for each of the six elements of the proposed conditions was again higher amongst residents and other respondents.

When asked for their views on the **proposed fee** of £1,331.00 **to cover the cost of administering**, **resourcing**, **and maintaining the delivery of the licensing scheme** during its five-year period, less than one third of respondents (29%) agreed that this was a reasonable fee. Over half (58%) disagreed, with 46% strongly disagreeing. Other respondents displayed the highest level of support for the proposed fee (67% in agreement), followed by residents (55% in agreement). 80% of landlords/agents and 66% of private tenants did not agree that the fee is reasonable.

Over half of respondents (52%) agreed that the **licence period should be reduced** if there is evidence for officers to do so. 27% disagreed and 21% did not feel able to express an opinion. A higher proportion of residents (85%) agreed that the period should be reduced, compared to 37% of private tenants and 36% of landlords/agents.

#### Alternatives to licensing and other comments

At the end of the survey, respondents were given the chance to provide any further comments on the proposals or any alternatives that the Council could consider. From a total of 297 comments, the most common cited was that the scheme is **unfair to landlords and bad for tenants** (36 comments), generally **disagreeing with the proposed scheme** (31 comments) and that the Council should **focus on tackling unlicensed HMOs and rogue landlords** (30 comments).

#### Views from the public meetings

Feedback was also gathered via three public meetings. Many of the participants were landlords or came from this perspective. Some of the key points from these sections within the report are summarised here.

- Most landlords felt that they were being penalised for a small number of bad landlords. Some felt that the Council should target criminal landlords, either as a priority for the scheme or as a better way of using existing resources
- Some landlords felt that there should be further discounts for landlords who are already licensed, for Part 1 of the licence fee associated with processing the application, as much of the information will be the same
- Questions were raised around the level of support that would be provided to landlords, particularly around helping them with more difficult tenants
- Many landlords felt that the compliance checks were very helpful to them and asked for more detailed feedback be given, for example in why they had passed their checks or further improvements that they may want to consider
- Wider issues around Haringey were highlighted by a number of landlords, particularly around the impact of wider schemes such as the ULEZ and local parking permit costs, as they are having an impact on the availability of reliable tradespeople to work in Haringey to do work on their property. The cost of parking was mentioned across a number of groups, with landlords asking for some considerations to be made by the Council more widely around the cost impact on them.

#### **Stakeholder views**

In total, feedback was gathered from 6 stakeholder interviews. These were a mixture a mixture of public sector organisations, a third sector organisation, a national landlord association and a local letting agent. The stakeholders interviewed are listed in Appendix 4. Key points from the responses are provided here.

• Stakeholders were largely supportive of the proposed scheme and felt that something needs to be in place to raise standards. However, all agreed that the scheme needs to be enforced to have any real impact. Most felt that there were no real viable alternatives available to the Council.

- Most felt that a borough-wide scheme was fair and easier to understand from a landlord and tenant perspective. Conversely, the NRLA felt that a smaller, evidence-based scheme focusing on key problematic areas, would most likely have a greater impact as resources would be focused rather than being spread too thinly across a wide area.
- A number of stakeholders felt that the Council had not delivered the compliance/enforcement side of the existing scheme and therefore questioned whether a new scheme would be any different and have any impact.
- Stakeholders working in the housing space felt that awareness raising amongst all parties in the sector was crucial, to get organisations, landlords, residents working together to identify and deal with substandard properties. Others felt that more support was needed from the Council and other local agencies for landlords, to help them deal with issues that they are less equipped to deal with, such as problem tenants and ASB issues.

#### Written responses

In total, 13 written responses were provided. Most of these were from the letting agent/landlord perspective. Themes from the responses are largely similar to those that came out of the public meetings and stakeholder interviews. A summary of key points includes;

- Landlords felt that the scheme is penalising good landlords and that some were considering whether it was financially viable for them to continue due to licensing and other financial pressures that they are now under. A number of respondents felt that the financial pressures across the board were leaving landlords with little alternative but to pass increased costs onto tenants in rent increases, which contradicts that Council's commitment to providing more affordable housing.
- Greater support from the Council for landlords to deal with problem tenants, along with a review
  of parking costs for compliance requirements for licence holders (such as when additional works
  need to be done on properties), and a list of local vetted tradesmen were suggested by a number
  of respondents.
- Discounts on licence fees for existing licence holders, those with multiple properties, or bigger discounts for accredited licence holders were also suggested.
- A lack of compliance and enforcement actions taken via the existing scheme was highlighted by some of the organisations from the landlord/agent sector. There were questions about the resourcing capacity that would be available through a new scheme to deliver on this front.
- A number of respondents asked the Council to think more long term about the housing market in Haringey, and to focus on building more affordable and social housing, rather than just focusing on the private rented sector.

#### **Experiences of HMOs in Haringey**

The survey contained a section of questions which looked to understand views and experiences of respondents regarding HMOs in Haringey. The key headlines are provided below:

#### HMO accommodation in Haringey

Respondents were asked to state the extent to which they agreed with a number of statements relating to **HMOs in Haringey.** 

- 30% agreed that most HMOs are in a good state of repair, 29% disagreed.
- 29% agreed that most HMOs have good waste management systems, 29% disagreed.
- 29% agreed that HMO accommodation is not a major contributor to fly tipping in the borough,
   27% disagreed.
- 28% agreed that most HMOs are well managed, 29% disagreed.
- 25% agreed that noise and ASB is managed well by HMO landlords, 30% disagreed.

Agreement with the statements was highest amongst private tenants and lowest amongst residents.

From a list of issues provided, three quarters of respondents (75%) said that they have not experienced any of the **issues with their accommodation** (this includes all respondents to the survey, not just those who had lived in private rented accommodation). Amongst those who have experienced issues, the most commonly experienced were damp and mould (15%), poor property conditions (13%) and overcrowding (11%).

Over one third (37%) of respondents agreed that **landlords in Haringey maintain their properties to a good standard**. A smaller proportion (24%) did not agree and notable proportions selected either neither agreed nor disagreed (17%) or felt unable to answer the question (22%).

Private tenants were the most likely to agree that landlords in Haringey maintain their properties to a good standard (57%). Around six in ten residents disagreed that this is the case (61%).

## Introduction

#### Background

Haringey has seen a significant increase in private rented sector; recent data modelling estimates that the borough has just under 44,000 privately rented dwellings. Alongside this growth, Haringey has noted an increase in the prevalence of problems such as poor property conditions and poor management, with correlations to smaller Houses in Multiple Occupation (HMOs) that do not fall under the statutory mandatory licensing scheme.

Haringey Council is considering introducing a new borough-wide additional licensing scheme, covering smaller Houses in Multiple Occupation (HMOs), which do not fall under the existing Mandatory licensing scheme.

Before making any decision, the Council 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 Council is proposing to introduce a new borough-wide additional licensing scheme of HMO properties that are privately rented, where 3 or 4 non-related tenants share an amenity, such as a bathroom or kitchen. The proposal covers Section 257 HMOs, which is a house which is now a converted block of flats where the standard of the conversion does not meet the relevant building standards (Building Regulations 1991) and where fewer than two-thirds of the flats are owner-occupied.

Under the scheme, landlords of private rented properties that fall under the remit of the scheme will be required to obtain a licence to rent out their property (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 additional licensing scheme, as well as views on the proposed licence fees, discounts, and conditions. It also looked at respondents' views of HMOs in the borough and experiences of issues in their accommodation.

### **Public consultation**

The public consultation took place over a 11-week period (27<sup>th</sup> November 2023 to the 12<sup>th</sup> February 2024). 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, with the Council's Communications team pushing out targeted communications to increase participation.

#### **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.

The Council sent out emails to all registered landlords who have licenses from the mandatory, additional or selective licensing schemes currently in place. To help spread the word far and wide, the Council collaborated with local partner organisations and other internal departments to promote the consultation.

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

Communications	
Direct marketing	<ul> <li>Email to 127 managing agents operating in the borough on 4 December 2023.</li> <li>Email to 220 landlord/letting agents registered with L.B Haringey landlord forum.</li> <li>Email to approximately 6726 existing licence holders in the borough on 7 December 2023.</li> <li>Leaflet advertising consultation distributed to tenant's properties which were being inspected as part of current additional HMO licensing scheme.</li> <li>Advertised consultation at Hermitage and Gardens Week of Action between 29 January and 2 February. Leaflet distribution, paper copies of survey, staff to promote and answer any questions.</li> </ul>
Partner	<ul> <li>Email to 22 commissioned partner organisations on 8 December 2023.</li> <li>Email to 64 Community partner charities and or organisations on 8 December and 16 January 2023.</li> <li>Email to landlord representative bodies on 6 December 2023.</li> <li>Mailshot to Connected Communities on 8 December and 18 December 2023.</li> <li>Mailshot to Neighbourhood Watch and Safer Neighbourhood Panel on 18 December 2023 and 17 January 2024.</li> <li>Email to Haringey Residents Associations week of 22 January 2024.</li> <li>Raised at ladder community Safety Partnership week of 22 January 2024.</li> <li>Local Citizens Advice Bureau agreed to promote to their clients.</li> <li>Haringey Reach and Connect &amp; Public Voice London Promoted via their staff and service users – direct contact 7 December 2023.</li> <li>6 partner interviews held throughout the duration of the consultation.</li> <li>Haringey Landlord Forum held on 5 February 2024.</li> <li>Letter to all London Local Authorities – 5 December 2023</li> </ul>
Press & Media	<ul> <li>Press release was distributed on 27 November 2023 to Local, Trade and National press. Delivered to a total of 471 contacts.</li> <li>Media coverage received:         <ul> <li>https://haringeycommunitypress.co.uk/2023/11/28/residents-invited-to-have-their-say-on-hmos/</li> </ul> </li> </ul>

#### Table 2: Communications activities (within the borough)

	<ul> <li>https://www.landlordtoday.co.uk/breaking-news/2023/11/london-borough-hmo-licensing-scheme-goes-out-to-consultation</li> <li>https://www.hamhigh.co.uk/news/23975980.haringey-landlord-must-repay-20k-rent-unlicensed-hmo/</li> <li>https://www.standard.co.uk/news/london/tottenham-landlord-haringey-hmo-licensing-rent-repayment-b1125646.html</li> <li>Advert placed in:         <ul> <li>Ham and High w/c 22 January 2024</li> <li>Independent: w/c 8 January, 29 January and 5 February</li> <li>Haringey Community Press: December and January edition (monthly)</li> </ul> </li> </ul>
Digital	<ul> <li>Information made available on the Council's website for the entire consultation period through a dedicated webpage.</li> <li>Regular reminders with links to the consultation were posted out via social media between 27<sup>th</sup> November 2023 and 12<sup>th</sup> February 2024.         <ul> <li>20 posts on Facebook</li> <li>20 tweets on Twitter, receiving a total of 3300 view, around a reach of 267,000 and 779,000 impressions.</li> </ul> </li> <li>Feature on the council's homepage carousel between 15 January 2024 and 25 January 2024.</li> <li>Feature in Haringey People Extra which is mailed to 12,000+ subscribers:         <ul> <li>1 December</li> <li>5 January</li> <li>2 February</li> <li>Adverts displayed on 32 digital screens around the borough between 7 December 2023 and 31 December 2023.</li> </ul> </li> <li>Advertising banner on the council's website from 6 December 2023 to 12 February 2024.</li> <li>Web Display, Meta, Snapchat, and Google Search call-to-action adverts between 27 December 2023 and 12 February 2024. This resulted in:         <ul> <li>Over 3,600,000 impressions</li> <li>Over 18,000 clicks</li> <li>A click through-rate of 0.51%</li> <li>Website placements included but were not limited to:                  <ul> <li>theguardian.com</li> <li>sky.com</li> <li>dailymail.co.uk</li> </ul> </li> </ul></li></ul>
Internal	<ul> <li>Advertisement on the council's staff intranet news board between 6 February 2024 – 12 February 2024.</li> <li>Feature on the council's internal digital screens between 12 January 2024 and 12 February 2024.</li> </ul>

In addition, three public meetings were held with interested parties who signed up to attend an in person or online workshop. In total, 21 attendees participated in the meetings, and qualitative views were gathered, which are presented in the report. A meeting was offered in December as an online event, but no attendees took part.

## **Profile of respondents**

An online survey was completed by 328 respondents. A breakdown of respondent types is provided.

Respondent profile	Number	% of responses
Owner occupier	63	19%
Private tenant	35	11%
Social housing tenant	4	1%
Landlord	165	50%
Letting or managing agent	13	4%
Business owner in Haringey	1	0%
Other	47	14%
	(1)	Aultiple answers nessible)

#### Table 3: Respondent profile to the online survey

(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.

The results in the report by sub group are presented by landlord/agent, resident (owner occupier and social housing tenants living in Haringey), private tenant and all other respondents (grouped together from business owner and 'other' groups, due to small number). Where people identified themselves as belonging to more than one group, we have assigned respondents to one principal group (prioritised by private tenants first (due to this being a small group), followed by landlords, agents, owner occupiers, social housing tenants and then by business in Haringey, and 'other').

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

## Survey responses to Additional Licensing proposal

In total, we received 328 responses. The profile of respondents is shown in Appendix 2. Below is a summary of these responses. 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.

#### **Additional Licensing Scheme**

Overall, just under half (47%) of survey respondents agreed with the proposal for renewing the additional HMO licensing scheme, with over a third (35%) strongly agreeing and a further 12% agreeing. A similar proportion (45%) of respondents disagreed, with the majority of these in strong disagreement (37%).

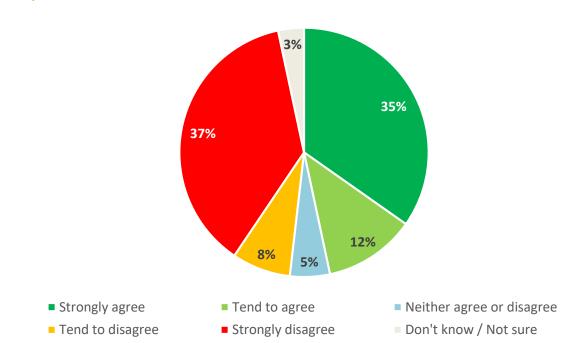
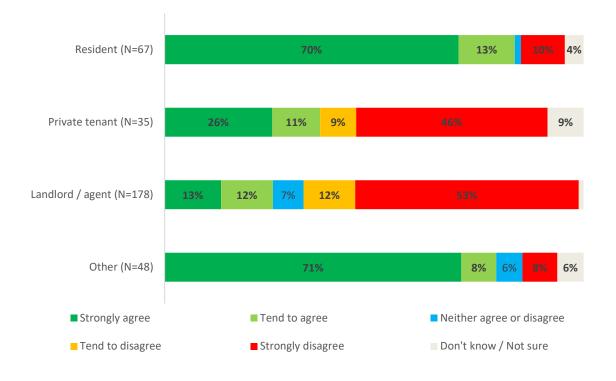


Figure 1: Level of agreement with the proposal for renewing the additional (HMO) licensing scheme for Haringey (N=328)

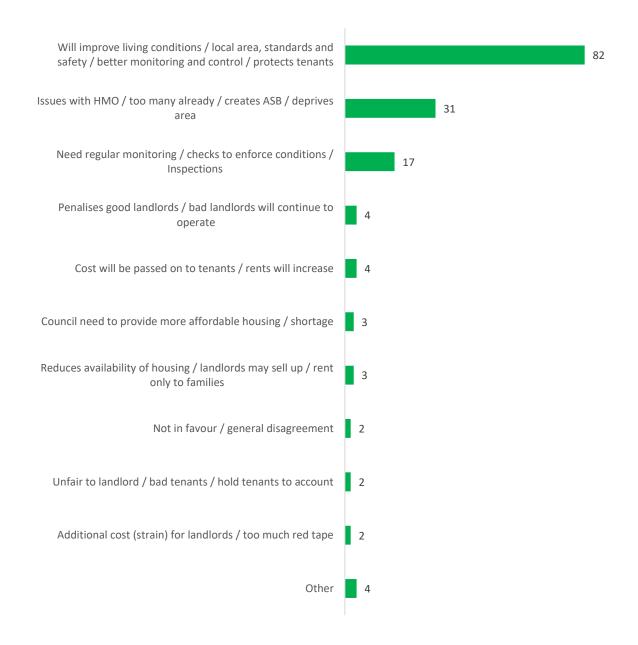
As shown by respondent type in the figure below, support for the proposal to renew the scheme was higher among **residents** (84% agreed) and **other respondents** (79% agreed). Higher levels of disagreement were cited by **landlords/agents** (66% disagreed) and **private tenants** (54% disagreed).

Figure 2: Level of agreement with the proposal for renewing the additional (HMO) licensing scheme for Haringey (by respondent type)



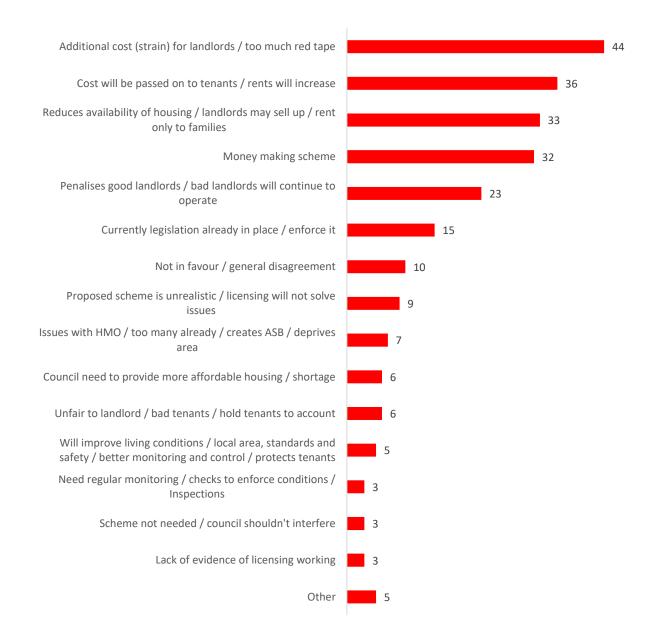
All respondents were then asked to provide their reasons why they agreed or disagreed with the proposed scheme. Comments show that the most common reasons provided by those who agreed with the proposed renewal of the additional licensing scheme (from 152 comments) included the scheme will **improve living conditions and the area generally** (82 comments), followed by **issues with HMOs and the impact they have needing to be addressed** (31 comments) and the **need to regularly monitor/inspect HMOs** (17 comments).

## Figure 3: Survey comments around why respondents agreed with introducing Additional Licensing (themed by common responses)



The most common reasons for disagreeing with the proposed renewal of the scheme (240 comments) included the additional costs (strain) for landlords and too much red tape (44 comments), that the costs will be passed onto tenants and rents will increase (36 comments) and that it will reduce the availability of housing and landlords will sell up (33 comments).

## Figure 4: Survey comments around why respondents disagreed with introducing Additional Licensing (number of comments themed by common responses)

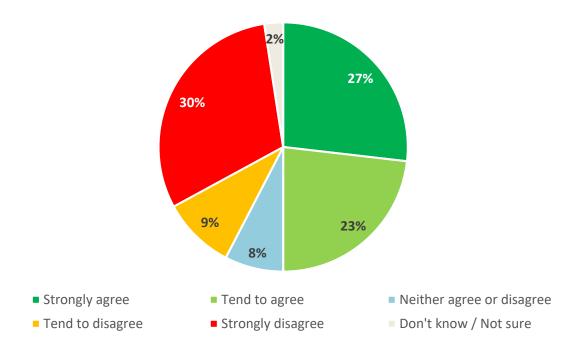


#### **Licence conditions**

The next section in the consultation looked at the proposed additional 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, standards** and **management of HMOs**. Half of respondents (50%) felt that the conditions would lead to an improvement (27% strongly agreed and 23% agreed). Four in ten (40%) did not believe that the conditions would lead to an improvement, with most of these respondents (30%) strongly disagreeing.

Figure 5: Level of agreement that the proposed licence conditions will improve the quality, standards and management of HMOs (N=328)



Agreement that there would be an improvement in quality, standards and management was higher among **other** respondents and **residents** (both 85% agreed), with greater levels of disagreement amongst **landlords/agents** (60% disagreed) and **private tenants** (49% disagreed).

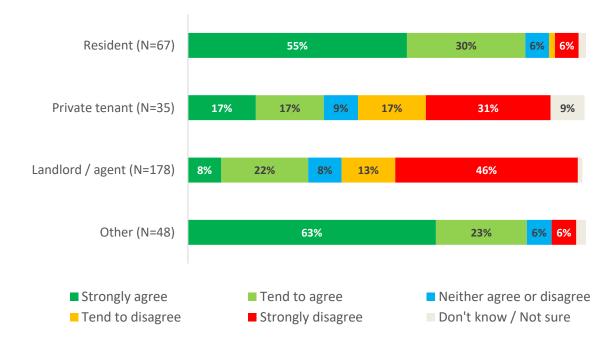


Figure 6: Level of agreement that the proposed licence conditions will improve the quality, standards and management of HMOs (by respondent type)

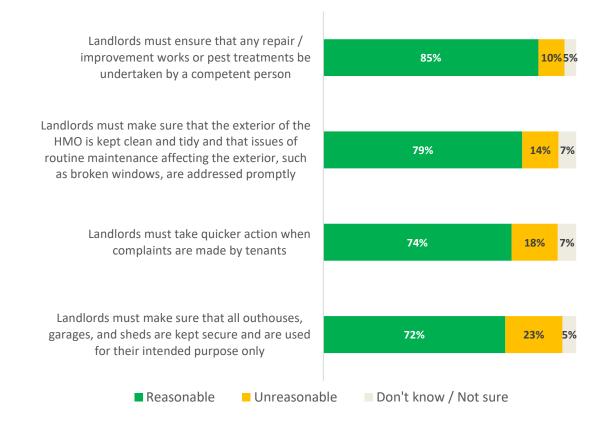
#### **Property management**

Respondents were asked to state how reasonable they found four elements of the proposed licence conditions regarding **property management**:

- Landlords must take quicker action when complaints are made by tenants.
- Landlords must ensure that any repair / improvement works or pest treatments be undertaken by a competent person.
- Landlords must make sure that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only.
- Landlords must make sure that the exterior of the HMO is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly.

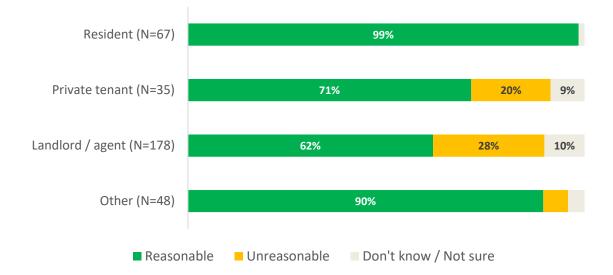
The majority of respondents saw each element as reasonable, with the greatest levels of support recorded for landlords ensuring that **any repair or improvement work or pest treatment is to be undertaken by a competent person** (85% felt it reasonable). The statement receiving the lowest levels of agreement was that landlords should make sure that **all outhouses**, garages, and sheds are kept secure and are used for their intended purpose only (72%).

Figure 7: Level of agreement that elements of the proposed conditions regarding property management are reasonable or unreasonable (N=328)



By respondent type, the view that landlords should take quicker action when complaints are made by tenants is a reasonable requirement was highest among residents (99%) and lowest amongst landlords/agents (62%).





By respondent type, the view that landlords should ensure that any repair / improvement works or pest treatments be undertaken by a competent person is a reasonable requirement was highest among **residents** (97%) and lowest amongst **private tenants** (77%).

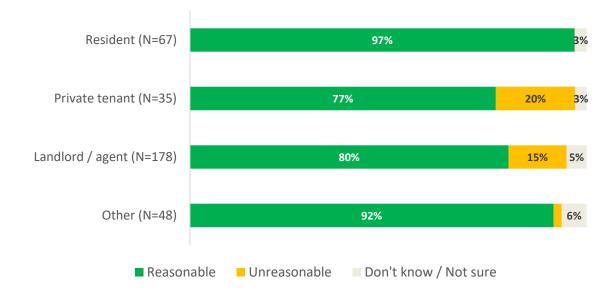
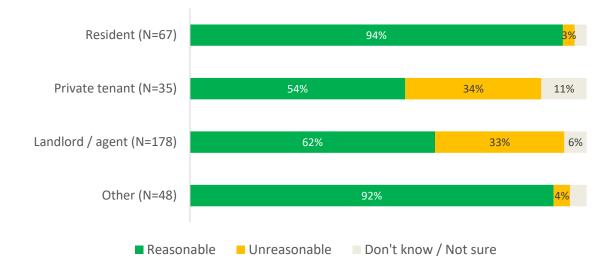


Figure 9: Landlords must ensure that any repair / improvement works or pest treatments be undertaken by a competent person (by respondent type)

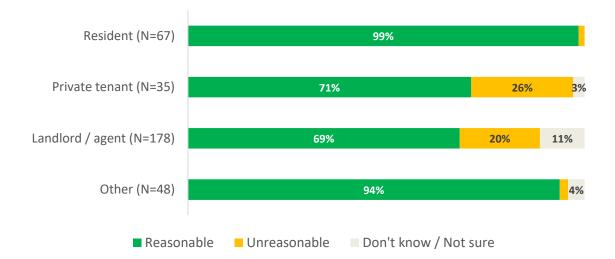
By respondent type, the view that landlords should ensure that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only, was highest among residents (94%) and other respondents (92%), and lowest amongst private tenants (54%).

Figure 10: Landlords must make sure that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only (by respondent type)



By respondent type, the view that landlords should ensure that that the exterior of the HMO is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly is a reasonable requirement was highest among **residents** (99%) and lowest amongst **landlords/agents** (69%).

Figure 11: Landlords must make sure that the exterior of the HMO is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly (by respondent type)



#### Waste management

Respondents were asked to state how reasonable they found elements of the proposed licence conditions regarding **waste management** (shown on the chart below).

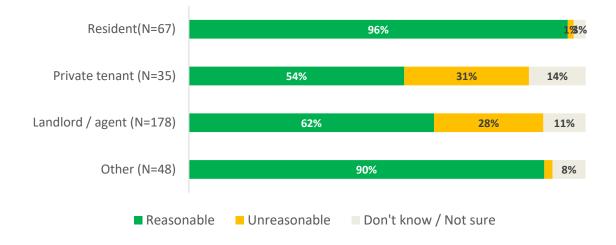
Between 69% and 79% perceived each element to be reasonable, with greater levels of support recorded for landlords ensuring that **tenants are provided with adequate facilities for the disposal of refuse and recycling** (79% reasonable). The statement receiving the lowest levels of support was that landlords should make sure that **waste such as old furniture, bedding, rubbish or refuse from the HMO is not left outside the HMO or in its vicinity** (67%).

Figure 12: Level of agreement that elements of the proposed conditions regarding waste management are reasonable or unreasonable (N=328)



By respondent type, the view that landlords must make sure that new tenants are, within 21 days of the start of their occupation, given information on waste and recycling was highest among residents (96%) and lowest amongst private tenants (54%).

Figure 13: Landlords must make sure that new tenants are, within 21 days of the start of their occupation, given information on waste and recycling (by respondent type)



The view that landlords must make sure that tenants are provided with adequate facilities for the disposal of refuse and recycling was highest among residents (99%) and lowest amongst landlords/agents (69%).

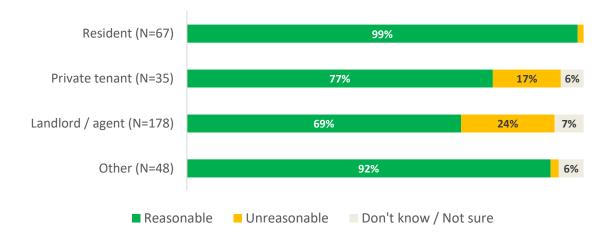
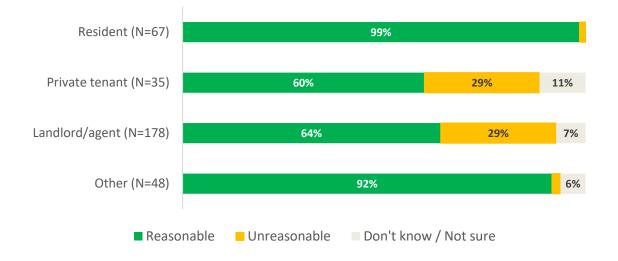


Figure 14: Landlords must make sure that tenants are provided with adequate facilities for the disposal of refuse and recycling (by respondent type)

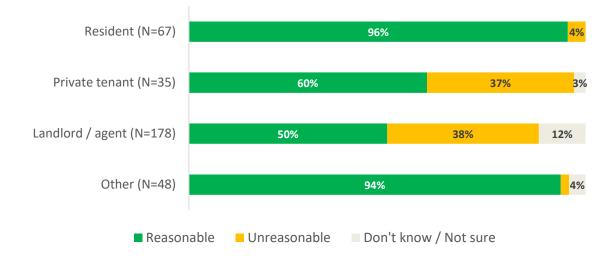
The view that landlords must make sure that regular checks are carried out to ensure that the common areas, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities was highest among **residents** (99%) and lowest amongst **private tenants** (60%).

Figure 15: Landlords must make sure that regular checks are carried out to ensure that the common areas, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities (by respondent type)



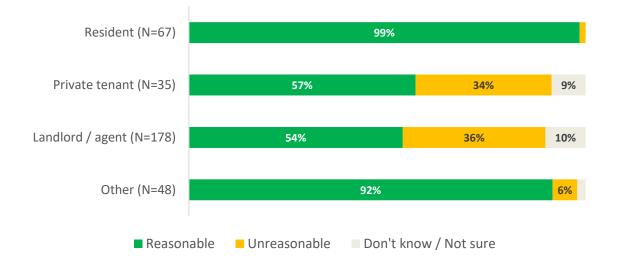
The view that landlords must make sure that waste such as old furniture, bedding, rubbish or refuse from the HMO is not left outside the HMO or in its vicinity is a reasonable requirement was highest among residents (96%) and lowest amongst landlords/agents (50%).

Figure 16: Landlords must make sure that waste such as old furniture, bedding, rubbish or refuse from the HMO is not left outside the HMO or in its vicinity (by respondent type)



By respondent type, the view that landlords must make sure that any type of waste which the authority does not routinely collect, such as hazardous waste is disposed of in a safe and lawful manner is a reasonable requirement was highest among **residents** (99%) and lowest amongst **landlords/agents** (54%).

Figure 17: Landlords must make sure that any type of waste which the authority does not routinely collect, such as hazardous waste is disposed of in a safe and lawful manner (by respondent type)



Views that landlords must make sure that old furniture, bedding, rubbish or refuse from the HMO is not left on, or immediately outside, the HMO or private land is a reasonable requirement was highest among residents (96%) and lowest amongst landlords/agents (56%).

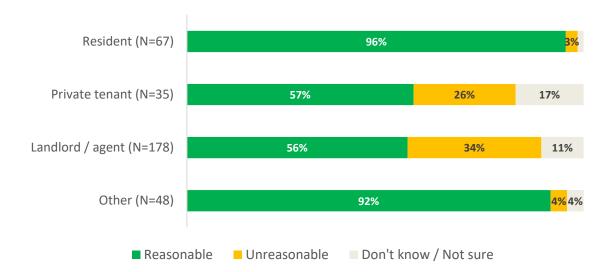
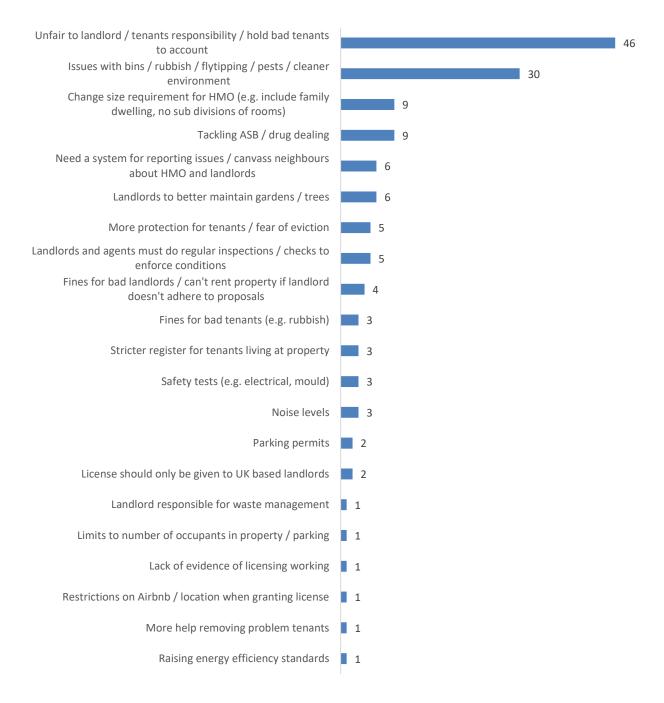


Figure 18: Landlords must make sure that old furniture, bedding, rubbish or refuse from the HMO is not left on, or immediately outside, the HMO or private land (by respondent type)

Respondents were asked if they had any other conditions that they would like the Council to consider. In total, there were 142 relevant comments that addressed the question. Although not specifically relating to actual conditions, the most common response was that the licence conditions were **unfair to landlords and that the tenants also had a responsibility/bad tenants should be held to account** (46 comments). This was followed by conditions needed around **bins, rubbish, flytipping and keeping the environment clean** (30 comments).

## Figure 19: Survey comments about other conditions that the Council could consider (themed by common responses)

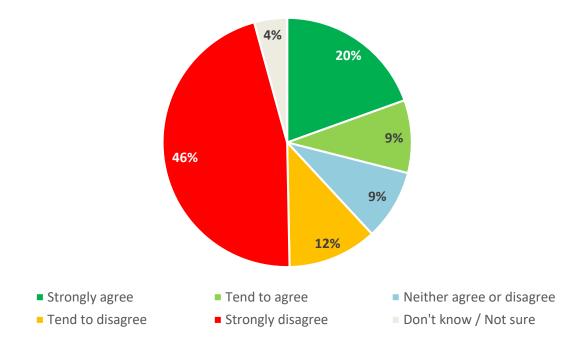


#### **HMO Licence fee**

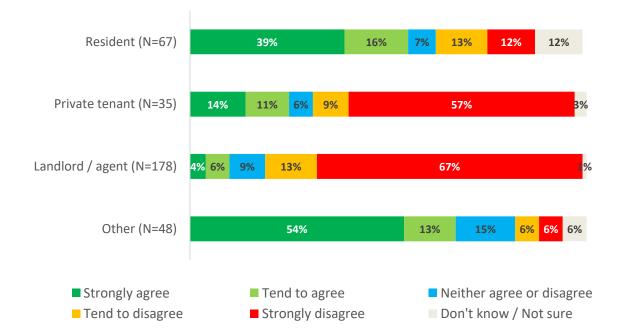
Local Authorities have the power to charge a fee for licensing to cover the cost of administering, resourcing, and maintaining the delivery of the licensing scheme during its five-year period. The proposed fee is £1,331.00 for up to 5 years. Respondents were asked whether they agreed that the fee is reasonable

Under one third (29%) of respondents agreed that the proposed fee is reasonable. Over half (58%) disagreed, with 46% disagreeing strongly.





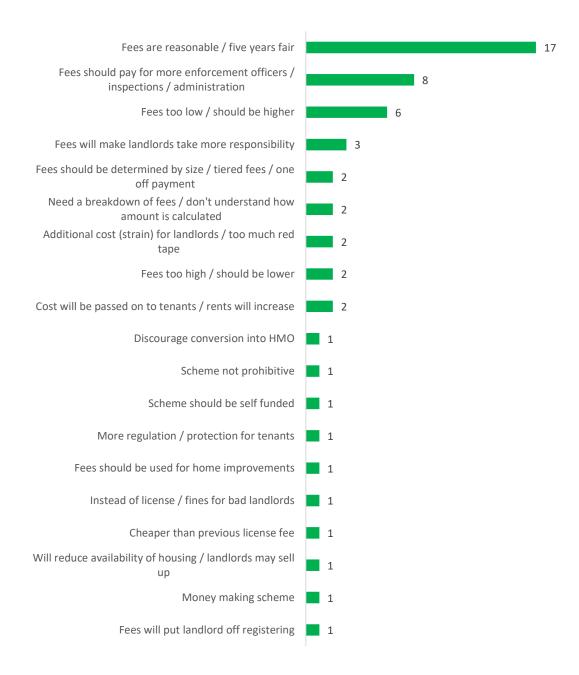
When we look at respondent type, the strongest level of support for the proposed fees is found amongst **other** respondents (67% agreed) followed by **residents** (55% agreed).



#### Figure 21: Level of agreement with the proposed licensing fees (by respondent type)

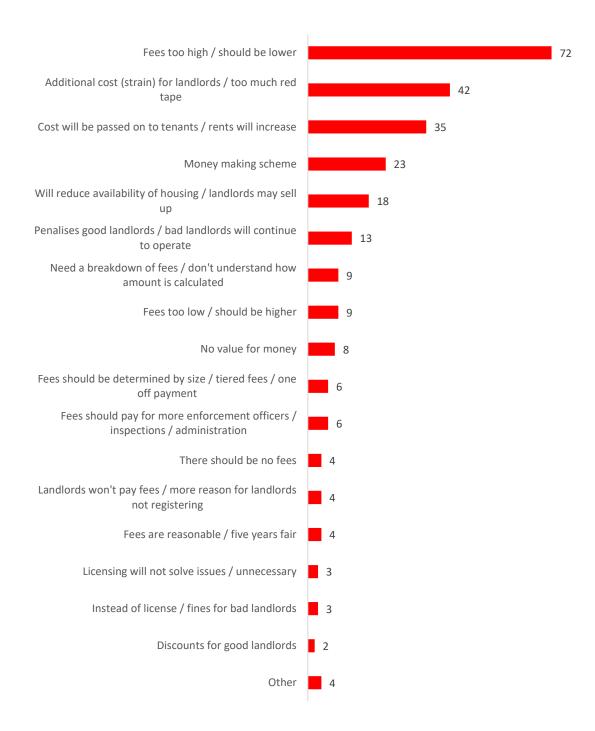
The survey then asked respondents to provide reasons for their answer. For those who agreed with the proposed fee (54 comments provided), the most common response was that the **fees are reasonable/fair over 5 years** (17 comments), that the fees should **pay for more enforcement officers/inspections** (8 comments) and that **fees were too low and should be higher** (6 comments). All comments have been coded and provided in the chart below.

# Figure 22: Survey comments around reasons for agreeing with the proposed licence fee (number of comments themed by common responses)



For those who disagreed with the proposed fee (265 comments provided), the most common response was that the **fees are too high and should be lower** (72 comments), followed by the fees being an **additional cost/strain on landlords/too much red tape** (42 comments) and that the **costs will be passed onto tenants** (35 comments).

## Figure 23: Survey comments around reasons for disagreeing with the proposed licence fee (number of comments themed by common responses)



The survey also asked whether respondents agreed or disagreed that the licence period should be reduced, if there is evidence for officers to do so. Over half (57%) agreed with the reduction and 27% disagreed. Two in ten (21%) did not feel able to express an opinion.

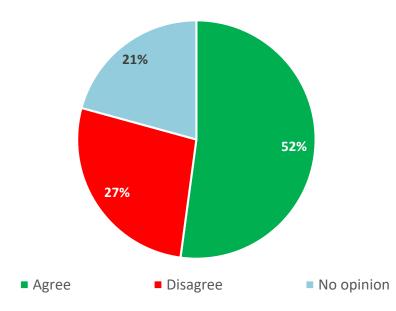
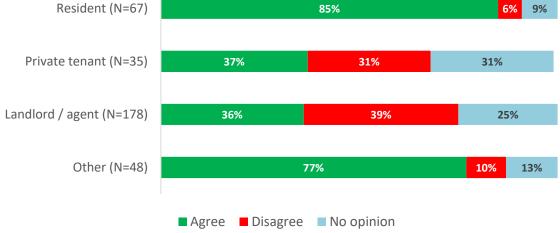


Figure 24: Do you agree or disagree that the licence period should be reduced if there is evidence for officers to do so? (N=328)

When we look at results by respondent type, a higher proportion of **residents** (85%) felt the period should be reduced, compared to 37% of **private tenants** and 36% of **landlords/agents**.

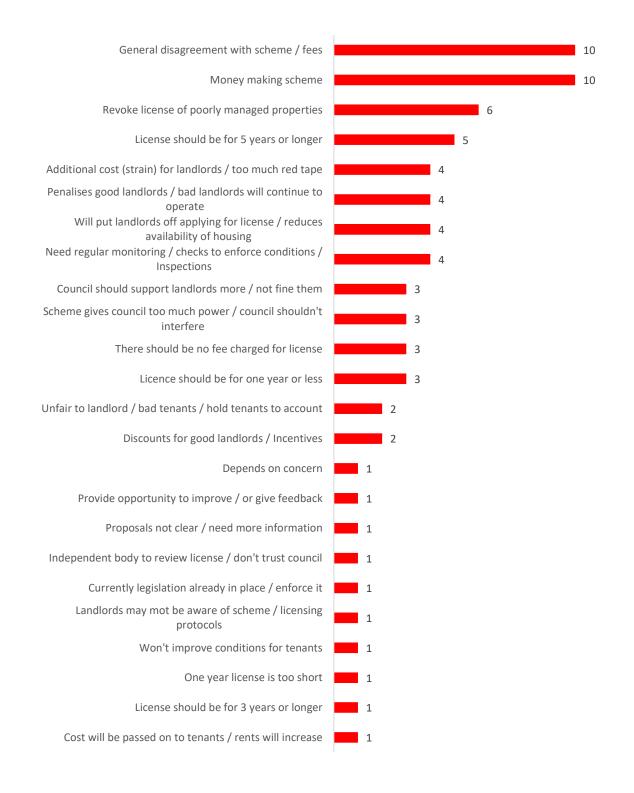


Figure 252: Do you agree or disagree that the licence period should be reduced if there is evidence for officers to



The survey then asked respondents who disagreed that the licence period should be reduced if there is evidence to do so, to provide reasons why they disagreed. From 73 comments, the most common response given was that they generally disagreed with the scheme and fees, and that it was a money making scheme (10 comments each ), followed by the Council should revoke the licence of poorly managed properties (6 comments)

# Figure 26: Survey comments if disagreed with the variation of licence period (number of comments themed by common responses)

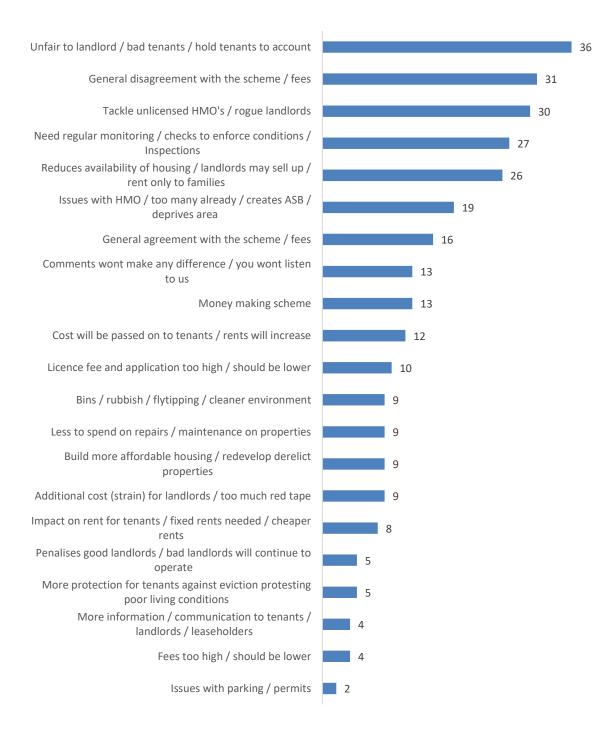


#### **Other comments and alternatives**

At the end of the survey, respondents were given the chance to provide any further comments on the proposals or any alternatives that the Council could consider. These are shown in the chart below.

From a total of 297 comments, the most common cited was that it was unfair to landlords and bad for tenants (36 comments), that they **generally disagreed with the proposed scheme** (31 comments) and that they Council should focus on tackling unlicensed HMOs and rogue landlords (30 comments).

#### Figure 4: Further comments or alternatives that the Council could consider(themed by common responses)



## **Public meetings**

Four public meetings were offered as a part of the consultation, with 2 proposed to be held online and 2 in person at Council offices (on the 11<sup>th</sup> December 2023, 10<sup>th</sup> January 2024, 25<sup>th</sup> January 2024 and 7<sup>th</sup> February 2024). The first online consultation had no participants in attendance. The final event was due to be in person, but with only 2 attendees interested in attending, this was moved to online to encourage a wider number of participants.

The meetings 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, 21 people attended the meetings, whilst 54 had booked to attend.

A summary of the key points is provided here:

#### **Tackling criminal landlords**

- A number of participants asked how the Council is going to find/target those who are unlikely to licence under the scheme. One landlord asked what resources/ evidence the Council has to help them identify where HMOs in the borough might be.
- Others felt that the scheme is just to make money out of good landlords who will always come forwards, but will do little to catch those who don't.

#### **Tenant/landlord responsibilities**

- There were questions across a number of the groups as to why and how landlords can be accountable for tenants behaviours and actions. One example given was around tenants taking out fire safety measures that landlords are required to install (such as batteries for sensors) and whether that would then be marked as non-compliant for the landlord during an inspection.
- Others felt that tenant rights are highly regarded and protected compared to landlords. One landlord said that there seemed to be little support for them if they had bad tenants and felt that the Council should do more to help them.

#### **Fees**

- A couple of landlords asked whether there would be a discount for landlords who already have a licence with the existing scheme, as the Council would already have much of their documentation on properties already licenced and had done the compliance check.
- One participant said that the Council states in its report that its ambition is to provide affordable housing in the borough, but they questioned how requiring landlords to potentially pay thousands of pounds extra every year in licences, upgrades, improvements, parking etc will only end up making rents less affordable, as they will inevitably have to pass the costs onto tenants.

• One landlord asked whether they could receive a discount on the fee if their managing agent is accredited, as they pay for them to manage it.

### **Compliance checks**

- A number of landlords said that they had found the compliance visits helpful in knowing what they needed to do in terms of improvements to their properties and felt reassured that they were providing a good service/accommodation to their tenants.
- A few landlords across the groups said that they had received no constructive feedback from their compliance visit, and didn't know whether there were any problems with their property.
- One landlord said that they had not received feedback for one property, but more recently had received feedback and found it very useful and had made some updates based on that.
- Another landlord said that they had received two compliance checks and the first said they had passed and the second that they had failed, with no idea why that had changed.
- Another landlord said that they are not a professional landlord, therefore it would be helpful for the inspection report to include suggestions/improvements that could be made to their property, as it would give landlords an idea of what they need to do.
- One participant commented that they felt the Council does not have enough inspectors to carry out compliance checks and asked what plans the Council has in place to carry out checks for the proposed scheme.

### Type of licence required

- There were a few landlords who had properties in the existing selective licensing scheme and had questions about whether they would need an additional or selective licence going forwards, or both.
- One landlord felt that it was very harsh if they did require a licence for both schemes for only one property (potentially a Section 257 flat). They also suggested that this may have an unintended consequence of reducing the amount of rental properties if landlords decide to sell up if they are having to pay on two fronts and potentially make updates to the property as well.

### Wider points around Haringey Council issues

 One landlord said that they were taking an increased financial hit due to having to pay ULEZ and Haringey parking costs for tradespeople to visit their properties to improve the properties, which they felt were unfair for them to have to pay for. They suggested that tradespeople are now frequently turning work away in Haringey due to the increased costs of working in the area and they as landlords were having to pay inflated rates/additional costs to secure the work, or were simply unable to source reliable people to do work on their properties. This was agreed by other landlords in the group.

- One landlord suggested that the Council should provide a list of vetted and regulated tradespeople that landlords can use to help them find the right people to do work on their properties, rather than leave it all down to landlords to source.
- Parking and the cost of parking in Haringey was an issue that was echoed by a number of landlords. One landlord said that they felt £22 per day to pay for a permit for anyone to visit the property was very high and there should be some form of exemption or discount if you have a licenced property.
- One landlord said that they own properties within 2 housing association properties and they were
  not looked after at all, yet they were being asked to do a lot more to their property than all the
  others in the same block. This was felt to be very unfair.

# **Stakeholder views**

We spoke to 6 stakeholders, a mixture of public sector organisations, a third sector organisation, a national landlord association and a local letting agent. The list of these organisations is provided in Appendix 4. Here is a summary of their views.

### **Views overall**

- Citizens Advice felt the scheme is needed and wanted much wider engagement with local landlords in the borough who provide a much needed service to residents. They felt that there were some negative perceptions that are being bandied about landlords in the borough, and they felt that the Council needs to deal with matters realistically and licensing is one way of dealing with substandard properties.
- The NRLA, although not completely opposed to additional licensing, felt that the Council has not shown enough evidence that they have been delivering the compliance aspects through the existing additional licensing scheme. They felt that the Council has to properly resource and undertake compliance checks of all properties, and subsequent enforcement actions to ensure they can evidence a positive impact.
- Similarly, Cousins Estate Agents felt that licensing works well when enforced and brings landlords 'into the fold to do what they need to do' but that the Council should support landlords to make improvements and when they have problematic tenants. They also felt that the Council should target bad landlords as a priority, rather than go for the more compliant landlords, which they felt just gives the Council some 'easy wins' rather than deal with the real criminal landlords.
- All other stakeholders interviewed were generally supportive of the scheme, but all were keen that the enforcement side needs to be an integral part of the scheme and needed to be delivered to see improvements.
- The Metropolitan Police also felt that licensing acts well as a deterrent and that the threat of potentially losing a property is often enough to get many people to react.

## Borough-wide or targeted scheme?

- Almost all stakeholders felt that a borough-wide scheme would be fairer and would make it easier for all landlords to comply, rather than having a smaller or targeted scheme, which can cause confusion for landlords and tenants alike. Many of those working across the borough felt that there were issues with poor housing standards across Haringey, not just in specific areas.
- Conversely, the NRLA believed that a more targeted, evidence-based approach, focusing on problem areas in the borough would be more beneficial and more achievable for the Council to manage, than a borough-wide scheme.
- Cousins Estate Agents felt that it would be unfair to target the less affluent areas in the borough and could create a greater divide between the 'haves and have nots'.

 Citizens Advice said that there are a lot of transient young people and professionals who move around the borough and have short term leases, therefore by having a universal scheme they could expect every privately rented property in Haringey to be adhering to the same standards.

#### Fees

- The majority of stakeholders felt that the licence fees were relatively reasonable, particularly when compared to some other London local authorities.
- The NRLA felt that it was important to provide a discount to accredited landlords.

#### **Licence conditions**

- Cousins Estate Agents felt that it was unfair to put all the responsibility and accountability for tenants behaviours on the shoulders of landlords. They felt more support should be provided by the Council for landlords who have problem tenants or limited recourse, particularly when they have provided the right facilities but tenants are just ignoring them or refusing to cooperate.
- Most other stakeholders felt that the conditions were reasonable and would help to keep tenants safe and should expect a decent standard of living.

## Impact of the existing licensing scheme

- The NRLA and Cousins Estate Agents questioned the degree to which the existing additional licensing scheme has had a positive impact on improving the PRS. Cousins Estate Agents felt that they had only seen licensed landlords targeted for improvements rather than the Council tackling the issue of unlicensed properties. However, the NRLA did appreciate that Covid-19 would have had an impact on the number of inspections that could have taken place during that period.
- The NRLA felt that Haringey had not delivered the volume of compliance checks that it needed to through the current scheme and that Haringey was towards the bottom of the list of local authorities in terms of enforcement action taken against problem properties. They felt that if poor property conditions were such a big problem in Haringey, they would expect the enforcement actions taken to reflect this rather than the bulk action being around not having a licence.
- Citizens Advice felt that the Council often is more passive in its approach to addressing issues with landlords than it should be, and that it should be firmer in the action that it takes against landlords. For example, they often raise issues with the Council that are having a very negative impact on tenants (such as rodents in houses or cookers not working) and the Council simply emails the landlord to ask them to sort the problem, with no other follow up action evident. They felt that the actions should be proportionate to the issues, rather than just a blanket approach.
- Conversely, Cousins Estate Agents felt that the Council often takes a firm line with landlords over the most minor issues, rather than trying to deal with them in a more supportive way.

## **Need for enforcement action**

- All stakeholders mentioned the need for compliance checks and enforcement as a crucial part of the licensing scheme to have any credibility and impact.
- The NRLA questioned the resources that the Council could put into the new scheme as they have not delivered the compliance checks or level of enforcement actions they need to. They wanted to know how it would be resourced in terms of Environmental Health Officers/Inspectors, rather than just processing licences. They urged the Council to think carefully about the scale of the task with the resources and capacity they are likely to have, given there is a national shortage of qualified EHOs.
- London Fire Brigade felt that the Council should also have a spot check regime to make sure landlords and keeping properties clean, tidy and habitable rather than just a one off compliance check.

### Support required for landlords

 Cousins Estate Agents felt that the Council should provide more support to landlords via the scheme, not just stand on the side of tenants. They felt that most landlords are compliant but were relatively powerless themselves to take action against tenants who refuse to comply, and that they may be found at fault themselves for tenants actions and behaviours. They felt that they are going to be in a very difficult position when Section 21s are abolished.

#### Awareness raising needed for any new scheme

- One stakeholder (relatively new to post) was not aware of the additional licensing scheme already
  in place, which they felt would have been helpful to know as they could have worked more closely
  with the Council/other agencies to identify problem properties that they encounter. They
  therefore felt it would be important to publicise the scheme to all organisations and support
  agencies working in the housing sector in Haringey, so that they could act on problems as they
  found them.
- Similarly, the Metropolitan Police felt there was a greater need for joined up/integrated working across agencies, particularly ASB and licensing.

#### **Alternatives**

Most stakeholders felt that there were no real viable alternatives to licensing at the present time.
 Citizens Advice felt it to be the most practical tool that the Council can use now and make a difference immediately, if used with enforcement.

- The Metropolitan Police felt that licensing allowed the Council to be proactive rather than just having the powers to only be reactive.
- The NRLA felt that the better alternative to a borough-wide scheme is to have a small scale scheme, like Manchester City Council for example, where they just concentrate on one or two problematic areas at a time, which would allow them to inspect a much higher number of properties on a number of occasions throughout the 5 year period and drive up standards. They could then look at other areas to target once the scheme has finished.
- Cousins Estate Agents felt that improvements are often made in areas where there are good neighbourhood watch schemes or a strong community safety partnership, which helps to identify the substandard properties/illegally let properties and it is those that report them to the Council. They felt that these areas tend to have better results than areas where there is no neighbourhood watch scheme.

### Wider comments

 Citizens Advice and Cousins Estate Agents felt that the Council needs to prioritise building more social housing in the long term and have a clear strategy for doing so, rather than relying on the private rented sector to fill the void.

# Written responses

We also received written responses from 13 individuals or organisations either via email or letter. We have summarised these into themes below and included the full responses in Appendix 4. 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

All landlords who provided a response to the consultation object to the proposed scheme. The financial pressures that they are already under means that some have said they are already selling up or considering doing so, due to the additional costs they are incurring across multiple fronts.

## **Rent increases**

Landlords and some other organisations who submitted responses said that landlords are being left with little alternative but to pass on the cost of licence fees and fees associated with compliance requirements onto tenants, therefore making the affordability of the sector even worse. Organisations and landlords stated that this may have an impact on the availability of property if people cannot afford increased rents and landlords cannot afford to operate. Propertymark suggested that rents may then go up further if there are fewer properties but the same level of demand, or that many will be priced out of living in Haringey.

# **Criminal landlords need to be targeted**

Many felt that the criminal landlords should be the ones targeted as a priority, not landlords who are trying to be/are compliant. Many felt that Council resources and budgets would be much better spent finding the criminal landlords than undertaking administering a scheme.

# **Support for landlords**

A number of landlords reported concerns around parking, and the impact this is having on the supply of good tradespeople to help support the upkeep/improve the standards of rental properties in Haringey. It was reported that landlords need tenants to request parking permits for tradespeople to park (at a cost of £22 a day) outside or near their properties to get work done, which can be problematic and an inconvenience on tenants. They suggested that the Council supports landlords in this matter and that it would be helpful to have a register of vetted tradespeople who were willing to work in Haringey. One suggested the Council could look to provides their own tradespeople to support landlords.

Others were concerned that the impact of Section 21 being abolished could have a huge impact on their ability to manage problematic tenants and therefore further support from the Council would be good considering the licensing cost to them.

Support available to landlords is highlighted as a missing gap in some of the other written responses, particularly around dealing with ASB caused by tenants, ensuring tenants deal with waste effectively etc... They suggest that the Council and other partners provide greater levels of support to landlords to help them deal with issues which they are often ill equipped to deal with (such as tenants who have drug/alcohol issues or mental health issues).

## Fees

Propertymark suggested a discount for landlords who own multiple properties and therefore require multiple licences. Safeagent suggested that there should be a fee discount for licence renewals as there would be less work involved if there are no changes. They have also suggested bigger discounts for accredited licence holders. This was echoed by other landlords who provided written responses.

# Scope of HMO properties in the scheme

Safeagent suggested that including Section 257 HMOs may be problematic for agents/landlords to identify whether their property may need to be licensed, and it may also have a wider impact on long leaseholder-owners (such as service charge increases or difficulties to sell on should they wish to move). They asked the Council to consider their stance on these in a new scheme.

# Impact of existing scheme

Propertymark and Safeagent suggest that the existing additional licensing scheme has not evidenced a positive impact, due to a lack of compliance checks and enforcement actions, and therefore express concerns that a further scheme will continue in the same vein given the size of the borough and number of properties that they need to inspect/potentially take action against.

# Additions to consider in proposals

Response 2 details a number of additional considerations and conditions for the Council to include in the consultation proposals. These include communication requirements for landlords when undertaking any form of works, along with measures to address ASB issues. They also ask the Council to consider the potential impact of the Renters Reform Bill and other legislation that may need to be incorporated into the proposed scheme. The full response has been provided for the Council to consider the list of recommendations.

Safeagent has also provided a list of suggestions to improve/fine tune the wording of the licence conditions. This is provided as Response 4.

# Wider considerations

A number of responses suggest that Council needs to focus on building more social and affordable housing, rather than focusing solely on the private rented sector.

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

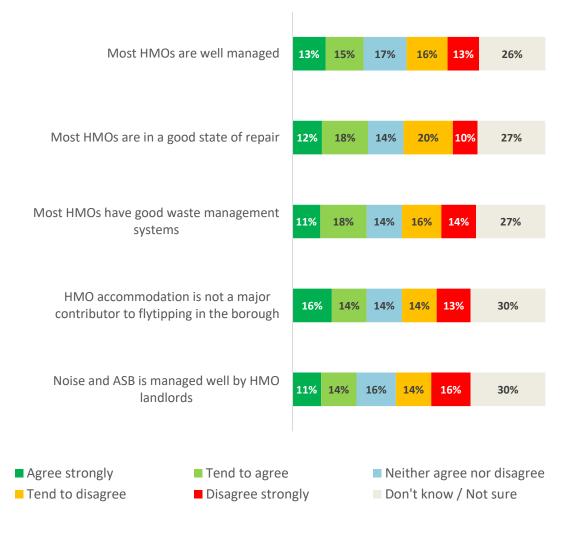
# **Experiences in Haringey**

The last section of the survey looked to understand views and experiences of respondents regarding HMOs in Haringey.

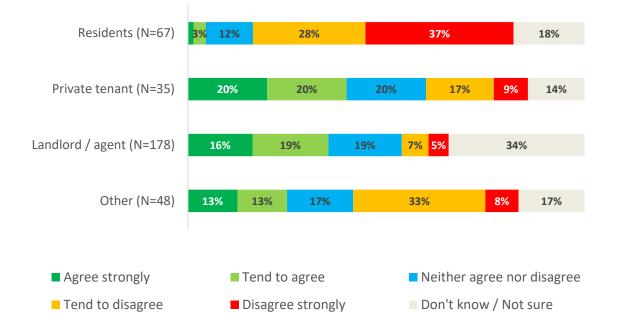
Respondents were asked to state the extent to which they agreed or disagreed with five statements on HMO accommodation in Haringey (shown in the chart below).

For each statement, approximately three in ten respondents agreed, and a similar proportion disagreed. In the region of four in ten selected either a neutral response to the statement, or did not feel able to comment.

#### Figure 28: Level of agreement with statements relating to HMOs in Haringey (N=328)



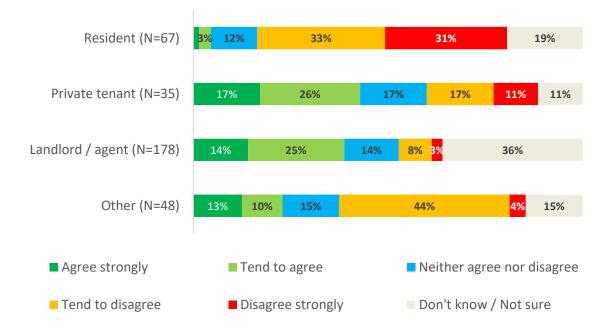
By respondent type, agreement that most HMOs are well managed was highest amongst **private tenants** (40%) and lowest amongst **residents** (4%).



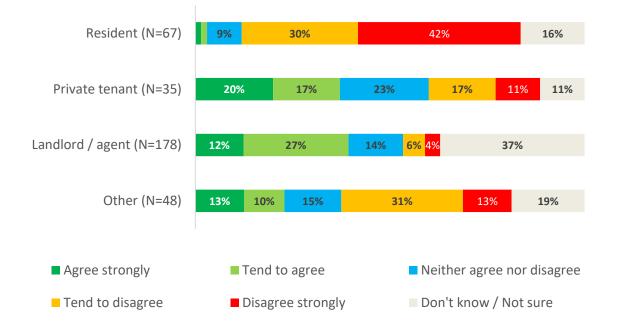
#### Figure 29: Most HMOs are well managed (by respondent type)

By respondent type, the view that most HMOs are in a good state of repair was highest amongst **private tenants** (43%) and lowest amongst **residents** (4%).

#### Figure 30: Most HMOs are in a good state of repair (by respondent type)



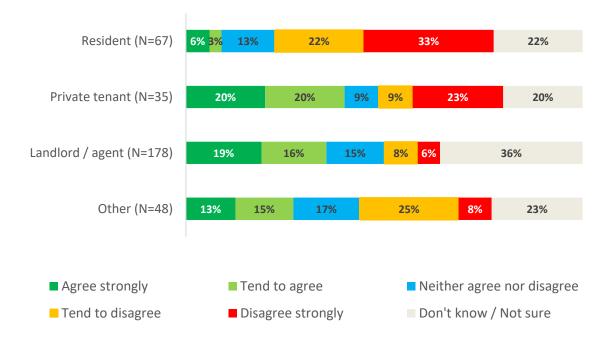
By respondent type, the view that most HMOs have good waste management systems was highest amongst **landlords/agents** (39%) and lowest amongst **residents** (3%).



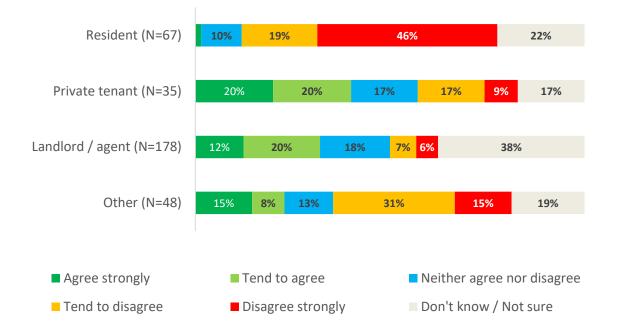
#### Figure 31: Most HMOs have good waste management systems (by respondent type)

Agreement that HMOs do not contribute significantly to fly tipping was highest amongst **private tenants** (40%) and lowest amongst **residents** (9%).

#### Figure 32: HMO accommodation is not a major contributor to fly tipping in the borough (by respondent type)



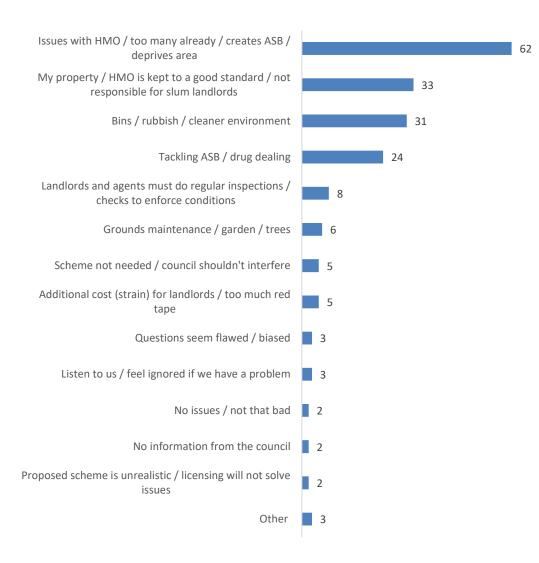
By respondent type, the view that noise and ASB is managed well by HMO landlords was highest amongst **private tenants** (40%) and lowest amongst **residents** (1%).





Respondents were then given the opportunity to expand on their responses to the previous questions around HMOs in Haringey, or provide examples of their own experiences. From the 189 comments provided, the most common responses were around **HMOs in general causing issues like ASB and that there are too many in Haringey** (62 comments), followed by properties and HMOs being kept to a good standard (33 comments) and that there have been issues with **bins/rubbish** (31 comments)

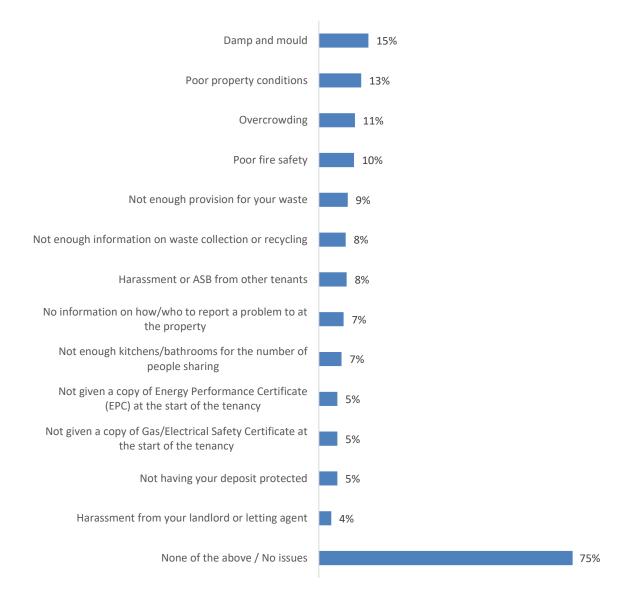
# Figure 34: Survey response to experiences of HMO accommodation in Haringey (number of comments themed by common responses)



Respondents were given a list of issues and asked to state whether they had experienced any of the issues in their accommodation. It should be noted that all respondents were invited to answer this question, not just those that live in HMO or private rented properties.

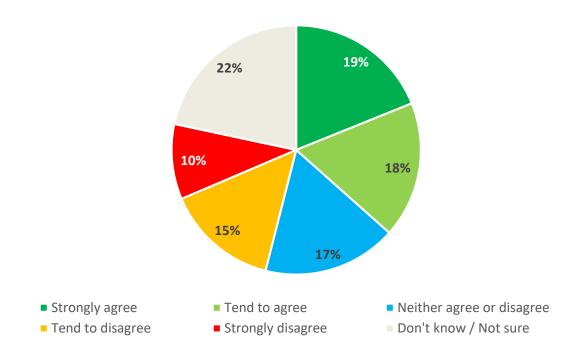
Three quarters of respondents selected **none of the above/ No issues**. Amongst those who did select one of the issues provided, the most commonly selected responses were damp and mould (15%), poor property conditions (13%) and overcrowding (11%).

#### Figure 35: Please indicate which of the following you have experienced with your accommodation. (N=328)



Finally, respondents were asked to state the extent to which they agreed that landlords in Haringey maintain their properties to a good standard.

Over one third (37%) agreed that this is the case, whilst a smaller proportion (24%) did not agree. Notable proportions selected either a neutral response (17%) or felt unable to answer the question (22%). Figure 36: Level of agreement that landlords in Haringey maintain their properties to a good standard (N=328)



By respondent type, **private tenants** were the most likely to agree that landlords in Haringey maintain their properties to a good standard (57%). The proportion of **residents** agreeing that this is the case is notably lower (4%).

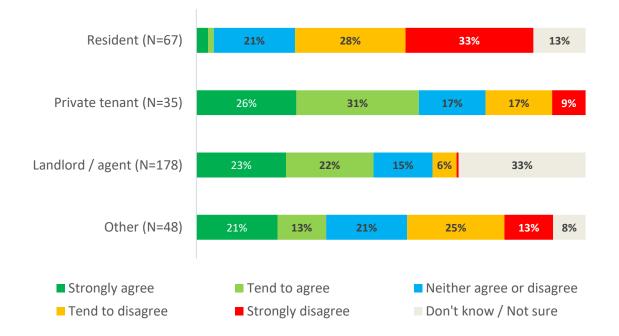


Figure 37: Level of agreement that landlords in Haringey maintain their properties to a good standard (by respondent type)

# Appendices

- **Appendix 1: Survey questions**
- **Appendix 2: Demographic profile of respondents**
- **Appendix 3: Stakeholder organisations interviewed**
- **Appendix 4: Written responses to consultation (separate document)**

# **Appendix 1: Survey questions**

# Haringey Additional Licensing consultation



This survey is conducted following the Code of Conduct of the Market Research Society. The information you provide in this survey will be used for research purposes only.

Our privacy notice which explains how we store and process data can be found on our website at https://melresearch.co.uk/page/privacypolicy.

#### Section 1: All about you

The first set of questions will allow us to understand who is responding to the survey.

Q1. Which of the following best describes you? Please select all that apply.

- Owner occupier
- Private tenant
- Social housing tenant
- Landlord
- Letting or managing agent
- □ Business owner in Haringey
- Other (please specify) \_\_\_\_\_

Q2. If you are a resident in Haringey, please tick which ward you live in. Select one only.

- O Alexandra Park O Northumberland Park
- O Bounds Green O Seven Sisters
- O Bruce Castle O South Tottenham
- O Crouch End O St Anns
- O Fortis Green O Stroud Green
- O Harringay O Tottenham Central
- **O** Hermitage and Gardens **O** Tottenham Hale
- O Highgate O West Green

- **O** Hornsey
- **O** White Hart Lane
- O Muswell Hill O Woodside
- O Noel Park O I am not a resident of Haringey

#### Q3. If you are a tenant in Haringey, please state which best describes the property that you

rent. Please select one only

- **O** I rent a room in an HMO with 4 or more tenants and share facilities.
- **O** I rent a room in an HMO with 4 or less tenants and share facilities.
- **O** I rent a studio or bedsit
- ${\bf O}$  I rent a self-contained flat
- **O** I rent a whole house with my family or another unrelated person.
- **O** I am a lodger
- ${f O}$  Other

#### Q4. If you manage any privately let property, which of the following best describes you?

Please select one only

- O Landlord who manages their own property
- **O** Landlord who uses a managing agent
- **O** Letting agent
- ${\mathbf O}$  Managing agent
- Not applicable (please go to Section 2)
- O Other interested party (please specify) (please go to Section 2)

# Q5a. If you are a <u>landlord or managing agent</u>, do you own/manage properties in Haringey?

Please select one only

- **O** Yes (please answer Q5b)
- **O** No (please go to Section 2)

# Q5b. How many properties of the following types do you own/manage in Haringey? Please tick one box for each row

	None	1 to 5 properties	6 to 10 properties	11 to 20 properties	More than 20 properties
Single occupancy dwellings					
Houses in multiple occupation: 3 to 4 persons					

	None	1 to 5 properties	6 to 10 properties	11 to 20 properties	More than 20 properties
Houses in multiple occupation: 5 or more persons					
Other					

**Q6. If you are a landlord or managing agent, how long have you been renting property for?** Please select one only

O Less than a year

**O** 1 to 5 years

O 5 to 10 years

O More than 10 years

**Q7. If you are a landlord or managing agent, do you belong to a professional body?** Please select one only

O Yes (please stipulate which one)\_\_\_\_\_

O No

#### Section 2: Additional (HMO) Licensing proposal

The Council is seeking views on the proposed redesignation of the Additional (HMO) licensing scheme for,

Smaller Houses in Multiple Occupation (HMO) that are privately rented with three or more nonrelated tenants sharing a kitchen or bathroom. (sec 254 HMO) A house which is now a converted block of flats where the standard of the conversion does not meet the relevant building standards (Building Regulations 1991) and where fewer than two-thirds of the flats are owner-occupied.

The proposal is for the scheme to be borough wide. If the scheme is approved, it would last 5 years from the date it became operational.

Please read the **consultation document** for full details of the proposal (Have Your Say document).

Q8a. To what extent do you agree or disagree with the proposal for renewing the additional (HMO) licensing scheme for Haringey? Please select one only

- ${f O}$  Strongly agree
- ${\bf O}$  Tend to agree
- **O** Neither agree or disagree
- ${\bf O}$  Tend to disagree
- **O** Strongly disagree
- O Don't know / Not sure

Q8b. Please tell us the reason for your answer.

#### Section 3: Licence conditions

As part of licensing, landlords must adhere to a set of licence conditions. They must ensure that the HMO is safe for the occupants, free from any disrepair and is well managed. Councils can use licence conditions to hold landlords to account. Landlords must take action in order to comply with the licence conditions when issues arise at an HMO property. Failing to comply with the licence is an offence which can mean prosecution or a fine.

We have identified areas where we believe our current additional HMO licence conditions need to be strengthened. We have therefore produced a new set of licence conditions that landlords would need to follow if a new licensing scheme was approved.

Please read the details of the proposed new HMO licence conditions (Appendix 2).

# Q9. To what extent do you agree or disagree that the proposed licence conditions will improve the quality, standards and management of HMOs? Please select one only

- **O** Strongly agree
- **O** Tend to agree
- **O** Neither agree or disagree
- ${\bf O}$  Tend to disagree
- **O** Strongly disagree
- O Don't know / Not sure

# Q10. How reasonable or unreasonable are the following elements of the proposed conditions regarding property management? Please tick one only for each row

	Reasonable	Unreasonable	Don't know / Not sure
Landlords must take quicker action when complaints are			
made by tenants			
Landlords must ensure that any repair / improvement			
works or pest treatments be undertaken by a competent			
person			
Landlords must make sure that all outhouses, garages,			
and sheds are kept secure and are used for their			
intended purpose only			
Landlords must make sure that the exterior of the HMO			
is kept clean and tidy and that issues of routine			
maintenance affecting the exterior, such as broken			
windows, are addressed promptly			

# Q11. How reasonable or unreasonable are the following elements of the proposed conditions regarding waste management? Please tick one only for each row

	Reasonable	Unreasonable	Don't know / Not sure
Landlords must make sure that new tenants are, within 21			
days of the start of their occupation, given information on			
waste and recycling			
Landlords must make sure that tenants are provided with			
adequate facilities for the disposal of refuse and recycling			
Landlords must make sure that old furniture, bedding, rubbish			
or refuse from the HMO is not left on, or immediately outside,			
the HMO or private land			
Landlords must make sure that any type of waste which the			
Authority does not routinely collect, such as hazardous waste			
is disposed of in a safe and lawful manner			
Landlords must make sure that regular checks are carried out			
to ensure that the common areas, gardens and yards are free			
from waste, which could provide harbourage for pests and/or			
is a nuisance and/or is detrimental to the local amenities			

	Reasonable	Unreasonable	Don't know / Not sure
Landlords must make sure that waste such as old furniture,			
bedding, rubbish or refuse from the HMO is not left outside			
the HMO or in its vicinity			

# Q12. Are there any other conditions that you would like the Council to consider including within the licence conditions?

#### Section 4: HMO licence fee

The Housing Act 2004 gives local authorities the powers to charge a fee for licensing which is to cover the cost of administering, resourcing, and maintaining the delivery of the licensing scheme during its five-year period.

The proposed fee is £1,331.00\* for up to 5 years. For more information about the fees, please read further information in our **Fees document** (Appendix 3).

\*In 2025/26 the fee will go up (normally by inflation)

# Q13. To what extent do you agree or disagree that the proposed licence fee for a 5-year licence (£1,331) is reasonable? Please select one only

- **O** Strongly agree
- ${\bf O}$  Tend to agree
- ${f O}$  Neither agree or disagree
- ${\mathbf O}$  Tend to disagree
- **O** Strongly disagree
- O Don't know / Not sure

#### Section 5: Variation of licence periods

Licences can last up to a period of five years. Where the Council has determined that there is cause for concern regarding premises or management arrangements, or when a landlord fails to apply for a licence voluntarily, the Council may determine that the licence should be granted for a shorter period.

The Council are proposing to only issue a licence for 1 year in these circumstances.

# Q15. Do you agree or disagree that the licence period should be reduced if there is evidence for officers to do so? Please select one only

- Agree (go to next section)
- O Disagree (Please answer Q16)
- **O** No opinion (go to next section)

Q16. If you disagree, please state why in the box below.

## Any further comments

Q17. If you have any further comments on the proposals, or any alternatives that you think the Council could consider, please write them below.

#### Section 6: Your experiences of Haringey

We know that Houses in Multiple Occupation provide a much-valued source of accommodation and is often the only affordable option for many people looking to rent in Haringey. As a result, there is often more demand for this property type, rents remain high and tenant turnover is commonplace.

We would like to know more about your experience of this sector through the next set of questions.

Q18. Thinking about HMO accommodation in Haringey, to what extent do you agree or disagree with the following statements? Please tick one option for each row

	Agree strongly	Tend to agree	Neither agree nor disagree	Tend to disagree	Disagree strongly	Don't know / Not sure
Most HMOs are well managed						
Most HMOs are in a good state of repair						
Most HMOs have good waste management systems						
HMO accommodation is not a major contributor to flytipping in the borough						
Noise and ASB is managed well by HMO landlords						

Q19. Please use the free text box to expand on any of your answers above, or if you would like to give examples of your experiences.

## Q20. Please indicate which of the following you have experienced with your

accommodation. Please select all that apply.

- Poor fire safety
- Not enough kitchens and bathrooms for the number of people sharing
- Overcrowding
- Damp and mould
- Poor property conditions
- □ Harassment or ASB from other tenants
- □ Harassment from your landlord or letting agent
- Not enough provision for your waste
- □ Not enough information on waste collection or recycling
- lacksquare No information on how or who to report a problem to at the property
- □ Not given a copy of Gas/Electrical Safety Certificate at the start of your tenancy
- □ Not given a copy of Energy Performance Certificate (EPC)at the start of your tenancy
- Not having your deposit protected
- ${f O}$  None of the above / No issues

# Q21. To what extent do you agree or disagree that landlords in Haringey maintain their properties to a good standard? Please select one only

- **O** Strongly agree
- **O** Tend to agree
- **O** Neither agree or disagree
- ${\bf O}$  Tend to disagree
- **O** Strongly disagree
- O Don't know / Not sure

#### Section 7: Further information

#### **Public meetings**

The Council will be running a number of public meetings to discuss the proposal and gather your feedback.

#### Q22a. Would you be interested in attending one of our public meetings? Please select one only

• Yes (please answer Q22b and Q22c)

**O** No (please go to the next section)

Q22b. Please indicate from the list of dates below which you would prefer to attend. Please select one only.

• Wednesday 10th Jan 2024 - 6:00pm-7.30pm: In person public meeting (River Park House, Wood Green, N22)

O Thursday 25th Jan 2024 - 3:00pm-4.30pm: Online public meeting

• Wednesday 7th February 2024 - 6:00pm-7.30pm: In person public meeting (River Park House, Wood Green, N22)

**O** Inform me of any further sessions

#### Q22c. Please provide your email address here if you would like to attend a meeting

### Keeping you informed about the proposal

# Q23. If the Council decides to go ahead with the proposed scheme, would you like them to contact you? By selecting 'Yes' you are consenting to having your email address provided to the Council so that they are able to contact you directly.

**O** Yes, I would be interested (please answer Q23b)

**O** No (please go to Section 8)

#### Q23b. Please provide your email address here.

#### Section 8: 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.

#### Q24. Which age group applies to you?

O Under 16	<b>O</b> 50 to 59
------------	-------------------

- **O** 17 to 21 **O** 60 to 74
- **O** 22 to 29 **O** 75+
- **O** 30 to 39 **O** Prefer not to say
- **O** 40 to 49

#### Q25. Please tick the box that best describes your sex. Please select one only

- **O** Male
- $\mathbf{O}$  Female
- O I use another term (please specify)\_\_\_\_\_
- **O** Prefer not to say

Trans is an umbrella term to describe people whose gender identity is not the same as, or does not sit comfortably with, the sex they were regarded to be at birth.

#### Q26. Do you consider yourself to be trans? Please select one only

- **O** Yes
- O No
- **O** Prefer not to say

Under the Equality Act 2010, a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day- to-day activities.

#### Q27. Are you disabled? Please select one only

- O Yes
- O No
- **O** Prefer not to say

# Q28. Please tell us which of the following impairment groups apply to you. Please select all that apply

- Visual Impairment
- Hearing Impairment
- Physical Impairment
- Mental health/mental distress issues
- Deaf / BSL User
- Learning difficulties
- □ Long term health condition / hidden impairment
- Neurodiverse
- Other (please specify)\_\_\_\_\_
- **O** Prefer not to say

#### Q29. How would you describe your national identity? Please select one only

- O Afghan O Irish
- O Australian O Italian
- ${f O}$  Bangladeshi  ${f O}$  Jamaican
- O British O Kosovan
- O Bulgarian O Lithuanian
- O Chilean O Northern Irish
- O Chinese O Polish
- O Colombian O Romanian
- O Cypriot O Scottish
- O Ecuadorian O Somali
- O English O Spanish
- O French O Turkish
- O German O United States
- O Ghanaian O Welsh
- O Hungarian O Any other National Identity. E.g. Canadian (please specify)\_\_\_\_\_
- $\mathbf{O}$  Indian

#### Q30. Please tick the box that best describes your ethnic group.

#### Asian or Asian British

- **O** Bangladeshi
- **O** Chinese
- $\mathbf{O} \text{ Indian}$
- **O** Pakistani
- O Any other Asian background (please specify)\_\_\_\_\_

#### Black, Black British, Caribbean, or African

- **O** African
- ${f O}$  Caribbean

O Any other Black, Black British, Caribbean, or African background (please specify)\_\_\_\_\_

#### Other ethnic group

- O Arab
- **O** Kurdish
- **O** Turkish
- **O** Any other ethnic group (please specify)\_\_\_\_\_

#### Mixed or multiple ethnic groups

- **O** White and Asian
- ${f O}$  White and Black African
- **O** White and Black Caribbean
- O Any other Mixed or Multiple background (please specify)\_\_\_\_\_

#### White

- O English/Welsh/Scottish/ Northern Irish/British
- O Irish
- **O** Gypsy or Irish Traveller
- O Roma
- O Any other White background (please specify)\_\_\_\_\_
- Prefer to self-describe (please specify)
- **O** Prefer not to say

#### Q31. Which of the following best describes your sexual orientation? Please select one only

O Bi

- O Gay / Lesbian
- **O** Heterosexual / Straight
- O I use another term (please specify)\_\_\_\_\_
- **O** Prefer not to say

#### Q32. How would you describe your religion or belief? Please select one only

- **O** Atheist
- ${f O}$  Buddhist
- **O** Christian
- $\mathbf{O} \; \text{Hindu}$
- ${f O}$  Jewish
- O Muslim
- **O** Rastafarian
- O Sikh
- O Prefer to self-describe (please specify)\_\_\_\_\_
- old O No Religion
- **O** Prefer not to say

#### Q33. Are you pregnant? Please select one only

- O Yes
- O No
- ${f O}$  Prefer not to say

#### Q34. Have you had a baby in the last 12 months? Please select one only

- **O** Yes
- O No
- **O** Prefer not to say

#### Q35. Please tick the box that best describes you. Please select one only

- O Single O Separated
- O Married O Divorced
- O Co-habiting O Widowed
- O Civil Partnership O Prefer not to say

#### Q36. Please tick which of the following benefits you receive, if any. Please select all that apply.

Universal Credit	Income-related Employment and Support Allowance
Income-based Jobseeker's Allowance	(ESA)
(JSA)	Council Tax Reduction Support
Working Tax Credit	Income Support
Child Tax Credit	<b>O</b> None of the above
Pension Credit	O Prefer not to say
Housing Benefit	

#### Q37. Which of these qualifications do you have?

Tick every box that applies if you have any of the qualifications listed. If your UK qualification is not listed, tick the box that contains its nearest equivalent. If you have qualifications gained outside the UK, tick the 'Foreign qualifications' box and the nearest UK equivalents (if known).

**O** No formal qualifications

Level 1 - e.g. 1-4 GCSEs, Scottish Standard Grade or equivalent qualifications

Level 2 - e.g. 5 or more GCSEs, Scottish Higher, Scottish Advanced Higher or equivalent qualifications

Level 3 - e.g. 2 or more A-levels, HNC, HND, SVQ level 4 or equivalent qualifications

Level 4 or above - e.g. first or higher degree, professional qualifications or other equivalent higher education qualifications

□ Other qualifications - e.g. other vocational / work related qualifications and non-UK / foreign qualifications

**O** Prefer not to say

#### Q38. Please tick the boxes that best describe your preferred language.

- Akan Japanese
- Albanian
  Kurdish
- □ Arabic □ Lithuanian
- Bengali Persian/Farsi
- Bulgarian Delish
- □ BSL User □ Portuguese
- 🗅 Chinese 🛛 🖨 Romanian
- English Russian
- □ Filipino □ Somali
- □ French □ Spanish
- German German
- Greek Urdu
- 🛛 Gujarati 🔹 🖓 Yiddish
- □ Hungarian □ Other (please specify)\_\_\_\_\_

# Appendix 2: Demographic profile of respondents

#### By gender

	Number of respondents	Percentage of total
Male	139	42%
Female	133	41%
I use another term	1	<0.5%
Prefer not to say	55	17%
Total	328	100%

#### By age band

	Number of respondents	Percentage of total
Under 16	0	0
17 to 21	0	0
22 to 29	19	6%
30 to 39	60	18%
40 to 49	66	20%
50 to 59	75	23%
60 to 74	62	19%
75+	5	2%
Prefer not to say	41	13%
Total	328	100%

## By disability

	Number of respondents	Percentage of total
Yes	14	4%
No	252	77%
Prefer not to say	62	19%
Total	328	100%

# By ethnic group

	Number of respondents	Percentage of total
Bangladeshi	0	0%
Chinese	1	0%
Indian	15	5%
Pakistani	1	0%
Any other Asian background	2	1%
African	6	2%
Caribbean	13	4%
Any other Black, Black British, Caribbean, or African background	1	0%
Arab	1	0%
Kurdish	0	0%
Turkish	2	1%
Any other ethnic group	6	2%
White and Asian	1	0%
White and Black African	0	0%
White and Black Caribbean	3	1%
Any other Mixed or Multiple background	4	1%
English/Welsh/Scottish/ Northern Irish/British	135	41%
Irish	15	5%
Gypsy or Irish Traveller	0	0%
Roma	1	0%
Any other White background	28	9%
Prefer to self-describe	4	1%
Prefer not to say	89	27%
Total	328	100%

# By respondent type

Respondents could tick more than one option.

	Number of respondents	Percentage of total
Owner occupier	63	19%
Private tenant	35	11%
Social housing tenant	4	1%
Landlord	165	50%
Letting or managing agent	13	4%
Business owner in Haringey	1	0%
Other	47	14%
Total	328	100%

# **Appendix 3: Stakeholder organisations interviewed**

We spoke to 6 stakeholders representing the following range of organisations and interests in Haringey:

- NRLA (landlord agency)
- Cousins Estate Agents
- Citizens Advice Haringey (tenant advice)
- Metropolitan Police
- Engage Haringey (part of Riverside)
- London Fire Brigade

# Appendix 4: Written responses to consultation (separate document)

# Appendix 5: London Property Licensing promotional campaign



## London Borough of Haringey

## **Additional Licensing Consultation**

London Property Licensing was asked to assist in promoting the London Borough of Haringey (LBH) additional licensing consultation to raise awareness amongst landlords and letting agents and increase participation.

The promotional activity took place between 12 December 2023 to 12 February 2024 in a variety of formats centered around the award-winning London Property Licensing (LPL) website:

www.londonpropertylicensing.co.uk

It is the only website dedicated to providing simple, impartial and expert advice on property licensing and explaining the licensing requirements across every London Borough. The website reaches out to landlords based throughout the UK and those based abroad.

Since launching in April 2015, the website has received over 1.7 million views (Source: Google Analytics, 2015 - 2023).

The activity undertaken to promote the licensing consultation is outlined below:

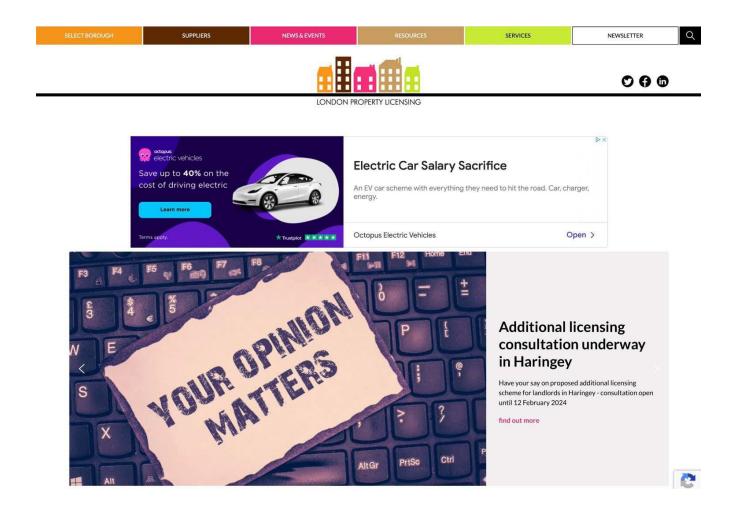
#### 1. Banner Advertising

A 300x250 pixel banner advert promoting the licensing consultation was placed on the home page and eight London borough pages<sup>1</sup> from 12/12/2023 to 12/02/2024. Anyone clicking on the advert was taken directly to the council's licensing scheme webpage.



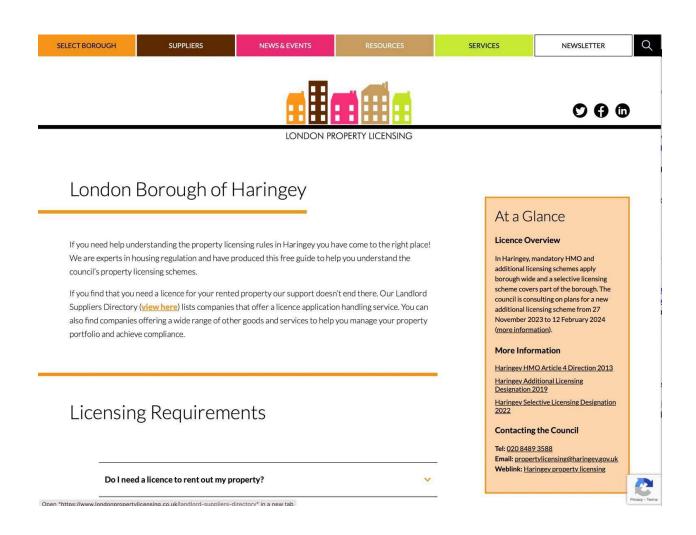
<sup>1</sup> Barnet, Camden, Enfield, Hackney, Haringey, Islington, Waltham Forest & Westminster.

From 15/12/2023 to 12/02/2024, high profile scheme promotion was achieved by inserting a banner headline attached to one of the rotating landscape images at the top of the LPL home page. The banner headline had a hyperlink to the LPL Haringey additional licensing consultation webpage.



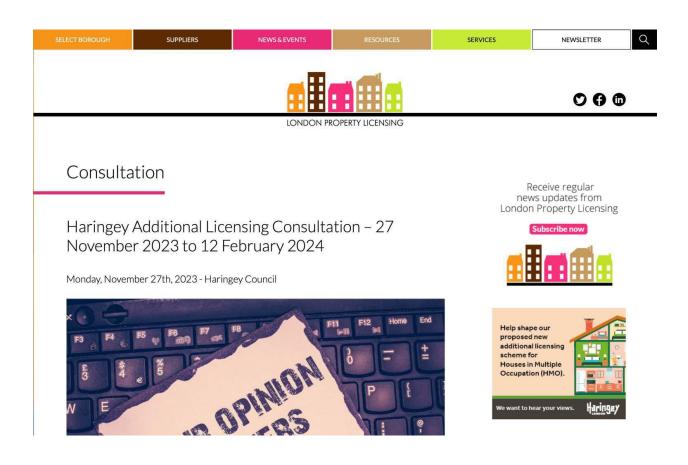
#### 2. LPL Haringey webpage

On 12/12/2023 the LPL Haringey webpage was updated with information about the licensing consultation and a direct link to the council's website in the 'At a Glance box' to encourage people to find out more information.



#### 3. Consultation listing

From 13/12/2023 to 12/02/2024 a LBH licensing consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultations page and on the same eight borough pages listed above. The listing summarised the purpose of the consultation and explained how people could take part.



Separate listings were added for the consultation events held on 10 January, 25 January and 7 February 2024.

#### 4. News article

A news article about the additional licensing consultation was published on 15/12/2023 and promoted via social media and the newsletter.

#### 5. LPL Newsletter

A regular newsletter is sent out to people who have requested updates on housing regulation and property licensing schemes. The newsletter is widely distributed to landlords, letting agents, organisations, local authority officers and government officials.

The new licensing scheme was promoted in newsletters distributed on 20/12/2023 and 31/01/2024 with each newsletter sent to between 3,711 and 3,717 people.

#### 6. Social Media Promotion

Tweets about the council's licensing consultation were published on the LPL Twitter feed (@lplicensing) on average every 12 - 14 days, timed to cover mid-week and weekends with and a variety of morning, afternoon and evening posts between 14/12/2023 and 11/02/2024.

During this period, the LPL Twitter feed had over 2,300 followers, generating impressions, likes and retweets.

On 04/01/2024, a post about the licensing consultation was published on the LPL LinkedIn page and on 16/01/2024 a post about the licensing consultation was published on the LPL Facebook page.

#### Summary

The promotional activity undertaken has helped to raise awareness of the council's additional licensing consultation amongst landlords, letting agents, property investors, local authorities and businesses associated with the private rented sector.

Whilst the promotional activity can help to raise awareness, it is not possible to measure how many people participated in the consultation exercise as a direct consequence of the promotional activity undertaken.

Should you wish to explore any further promotional activity in the future, please do not hesitate to get in touch.

#### **Contact details**

For more information, please contact:

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23 February 2024



