

Appendix 1

London Borough of Haringey

Additional and Selective Licensing

Evidence Base

October 2017

Content Page

Section	Title	Page Number
1	Forward	3
2	Introduction – Licensing the private sector	4 – 5
3	Haringey's proposal – selective and additional licensing	6 – 9
4	Why the Council is considering a borough wide additional licensing and a part borough selective licensing scheme.	10 – 13
5	Alternative options considered	14
6	Haringey's demographics and the housing stock	15 – 18
7	Links to other strategies	19 – 25
8	Methodology	26 – 42
9	Conclusion	43 – 44

1. Forward

Haringey is part of North London, covers an area of 30 square kilometres and shares its borders with six other London boroughs. Clockwise from the north they are: Enfield, Waltham Forest, Hackney, Islington, Camden and Barnet. Some of Haringey's more familiar local landmarks include: Alexandra Palace, Bruce Castle and Tottenham Hotspurs. Of surprise to many visiting Haringey for the first time, the borough includes large areas of wood land and green spaces. In contrast, it has a busy network of roads and bus routes, is served well by public transport and has many successful local businesses - On many fronts it is a thriving borough.

The geographical contrasts are matched by the contrasts in its demographics. Areas in the west of the borough such as Highgate, Muswell Hill and Crouch End are among the most prosperous in the country, whereas in the east of the borough some wards are classified as being among the most deprived in the country. Regeneration is a key priority for the borough and many of these areas will undergo a significant change in the coming years. Our residents come from many different cultures and we are proud of our diverse communities, many of whom have chosen to settle and remain in Haringey.

Haringey is a place of great opportunity. Growth is at the heart of our ambition and we recognise that the changes affecting the borough provide both exciting opportunities and significant challenges.

Demand for housing is at an all-time high and Haringey needs a wide range of homes, in terms of size, type and tenure to meet the diversity of current and future needs. Rather than compromise the housing standards and conditions of both new and existing housing to meet the ever increasing demand, we want to ensure that all who live in our borough have access to decent, secure housing.

We need more homes, but those homes need to be of a high quality. We believe that a safe, warm and well maintained home should be available to all and not influenced by the person's level of income or background. We want the private sector, which makes up a third of Haringey's housing, to thrive and be part of that offer.

Equally we need to improve peoples' surroundings and their local environment by reducing crime and anti-social behaviour. This includes fly-tipping, rubbish left on the highway and untidy front gardens. All blight communities and become a barrier to creating homes and communities where people choose to live. This type of anti-social behaviour contributes to a perception of an area being unsafe which can subsequently encourage further disorder and crime.

We consider that extending our additional licensing scheme and introducing a selective licensing scheme are the best tools available to tackle problems or poor housing management practices and conditions. Licensing will become part of a wider strategic approach to drive up living standards for all, improve the environment and make Haringey the best place to live in London.

Councillor Peray Ahmet

CABINET MEMBER FOR ENVIRONMENT.

2. Introduction - Licensing the private sector

2.1. Background information

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

2.2. Mandatory Licensing of certain HMOs.

All local authorities are obliged to run a licensing scheme covering Houses in Multiple Occupation (HMOs) that have three or more storeys and are occupied by five or more people who are not living together as a single household.

2.3. Additional Licensing – HMO

Local authorities can introduce a discretionary additional scheme for other types of HMOs not subject to mandatory licensing in part or whole of the area within its district.

2.4. Selective Licensing

A discretionary selective licensing scheme covers all other private sector dwellings and can be introduced in part or whole of the borough.

All licensing schemes are intended to address the impact of poor quality housing, rogue landlords and anti-social tenants. In an area subject to licensing, all private landlords must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action. Schemes run for a maximum period of five years and a fee is payable for each license.

2.5. Statutory conditions and evidence

2.6. Additional HMO Licensing

Under Part II of the Housing Act 2004, local authorities can designate areas or the whole of the area within their district as subject to additional licensing in respect of some or all of the HMOs in its area that are not already subject to mandatory licensing.

Before making an additional HMO licensing designation for a particular type of HMO, or for a particular area, the local authority must:

- Consider that a significant proportion of the HMOs in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to problems either for those occupying the HMOs or for members of the public.
- Consider whether there are any other courses of action available to them that might provide an effective method of dealing with the problem or problems in question.
- Consider that the making of the designation will significantly assist them to deal with the problem or problems.

2.7. Selective Licensing

Under Part III of the Housing Act 2004, local authorities can designate areas or the whole of the area within their district as subject to selective licensing in respect of privately rented properties, provided certain conditions are met.

Changes in legislation in April 2015 mean that local authorities are now required to obtain approval from the Secretary of State for any selective licensing scheme that would cover more than 20% of their geographical area or would affect more than 20% of private rented houses in the local authority area.

In order for selective licensing to be considered one or more of the following 6 statutory grounds have to be met:

The area:

- i. Is an area of low housing demand (or is likely to become such an area)
- ii. Suffers from or has a significant and persistent problem caused by anti-social behaviour not being adequately addressed by landlords of privately rented accommodation.
- iii. Is experiencing poor property conditions.
- iv. Is experiencing or has recently experienced an influx of migration.
- v. Is suffering high levels of deprivation.
- vi. Is suffering high levels of crime.

Criteria iii – vi can only be applied where the area contains a high proportion of private sector dwellings. The national average is currently 19%.

2.8. Conditions for both Additional and Selective Licensing.

For both additional and selective licensing, there is also a requirement on the local authority to:

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

3. Haringey's Proposal – Selective and Additional Licensing

Our main driver for introducing a selective licensing scheme and extending our additional licensing scheme is to improve housing conditions and the quality of life for residents by tackling ASB and environmental crime associated with poorly managed private sector properties. Our aim is that over the 5-year period the licensing schemes will offer the following outcomes:

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

Based on the evidence outlined in section 7 of this report, Haringey is proposing to implement a 5-year licensing scheme as follows:

3.1. Houses in multiple occupation – HMOs

A borough wide additional licensing scheme to include **all** HMOs that are currently excluded from the mandatory licensing scheme.

For the purpose of this scheme, HMOs will include the category of HMO which is often referred to as a section 257 HMO. Section 257 HMOs are where the building was converted into self-contained flats before the 1991 Building Regulations came into force on 1st June 1992 and have not been subsequently improved to at least the 1991 standards. It could also include conversions done without complying with then current Building Regulation (i.e. without Consent); in this case the 1991 deadline does not apply. The purpose of bringing this group of properties into the HMO category is to give local authorities extra powers to ensure good management and standards of safety. It is recognised that a significant proportion of conversions were constructed well before modern Building Regulations required proper fire safety measures, including smoke detection.

The inclusion of section 247 HMOs will result in every HMO in the borough being regulated through a licensing regime.

3.2. Selective licensing scheme – single dwelling properties.

In order to target the areas in greatest need, we are proposing a partial selective licensing scheme covering 20% of the geographical area. The areas identified are based on Lower Super Output Areas (LSOAs) – 29 LSOAs have been selected for the scheme. More information on LSOAs can be found in section 7 of this report.

The introduction of a borough wide additional licensing scheme will capture all HMOs – the dwellings that present the greatest risk. The pepper potted coverage of a selective licensing scheme will target single dwelling properties flagged problematic and complement the additional scheme.

A map detailing the designation of both schemes is attached (**To be included**)

3.3. Licensing fees

Financial modelling has been carried out to establish the operating cost of the scheme over a 5-year period. The fee for an additional licence will be £208 per unit of accommodation and the fee for selective licensing will be £500 per property. An early bird discount of 50% will be offered for a period of 3 months before the designation comes into force. This is intended to recognise those landlords who take their responsibilities seriously and apply for a licence at the earliest opportunity.

A higher fee will be charged to landlords who fail to licence their property and have sought to evade the licensing process or have come to the notice of the Council for failing to manage their property effectively.

The proposed schedule of fees and associated charges is set out below:

Selective Licensing	
Selective Licensing fee for a 5- year licence - applicants applying before the licensing designation comes into force (50% discount)	£250
Selective Licensing fee for a 5-year licence – applicants applying after the designation comes into force.	£500
Additional Licensing (HMOs outside of the Mandatory Licensing scheme)	
Additional Licensing Fee for a 5-year licence - applicants applying before the licensing designation comes into force (50% discount)	£104. Per unit of accommodation
Additional Licensing fee for a 5-year licence – applicants applying after the designation comes into force.	£208. Per unit of accommodation
Other Fees (fees apply to both Selective and Additional licensing unless otherwise stated.	
Paper applications	£100
Assistance with completing the application form	£60
Assistance with completing the application form, including the drawing of floor plans (<i>HMOs only</i>)	£390
Change of licence holder – new application fee	£500 Selective licensing / £208 per unit of accommodation for HMOs

Application refused by the council – no refund	
Temporary Exemption Notice	£30.00
Variation of Licence period* (<i>see below</i>)	£500 Selective licensing / £208 per unit of accommodation for HMOs

** Variation of Licence*

The licence period may also be varied from 1 year to 5 years depending on the level of compliance. The full licencing fee will be payable whatever the duration of the licence. Factors taken into account will be e.g.

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

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

3.4. Licence Conditions

The Housing Act 2004 requires that every licence must include certain mandatory management conditions. Councils also have the power to include other discretionary conditions which they consider appropriately for tackling the problems associated with private sector dwellings.

The proposed conditions are attached as appendix 1a and 1b

3.5. Penalties for non-compliance

It is a criminal offence to let out a property in a designated licensing area without a license, or for failure to comply with any condition of the licence. Failure to apply for or obtain a licence could lead to prosecution and an unlimited fine or, as an alternative to prosecution, the issue of a fixed penalty notice with a financial penalty of up to £30,000.

The level of any financial penalty issued will be based on factors including:

- Severity of the offence,
- Culpability and track record of the offender,
- Harm caused, or the potential for harm to be caused, to the tenant(s),
- An appropriate and proportionate punishment of the offender,
- A suitable deterrent to committing the offence,

- Removal of any financial benefit the offender may have obtained as a result of committing the offence.

In addition, the Council or the tenants of the property could apply to the First Tier Tribunal (Property Chamber) for a Rent Repayment Order, requiring the landlord to repay an amount equivalent to up to twelve months of any rent received in respect of a property.

If a license applicant or property manager has been convicted of a specified criminal offence or issued with a financial penalty, s/he may be considered as not '*fit and proper*' to hold a licence and may be refused a licence. Similarly, in such cases, an existing licensee may have their licence revoked. In cases where the person applying for the licence is not considered fit and proper and the property is to continue to be rented, an alternative, unrelated person will have to apply to be the licence holder. If a suitable licence holder cannot be found then the council may have to take over management of the property itself by, for example, making an interim management order under Part 4 of the Housing Act 2004.

3.6. Support for Landlords

The proposed operating model and fee structure includes the following support for landlords:

- Outreach officers will work with landlords and private tenants to provide advice and assistance.
- A dedicated web page will be set up with helpful standard letters/tenancy agreements and signposts to independent organisations that provide support and assistance to landlords.

4. Why the Council is considering a borough wide additional licensing scheme and a part borough selective licensing scheme.

We know that there has been a dramatic increase in the number of private rented properties within Haringey. We estimate that we have approximately 35,500 private sector dwellings. Much of the sector provides decent accommodation and is reasonably well managed and plays an important key role in the provision of accommodation to meet homelessness. However, there are problems associated with parts of the sector arising from poor management and property conditions and related problems of anti-social behaviour. Poor property conditions are particularly prevalent within HMOs. We know that Increasingly more and more smaller houses are being poorly converted into shared accommodation, these properties are problematic and currently fall outside of the Mandatory Licensing scheme.

The rise in the private rented sector within Haringey is mirrored nationally with the majority of all boroughs reporting an increase in private sector accommodation. The change in tenure is also accompanied by the change in the type of private sector landlords. The proportion of part time landlords – those who supplement their day job with rental income has reached its highest level. The National Landlords Association (NLA) estimate that part time landlords now make up more than 70% of the sector – the sector no longer consists of experienced landlords who are aware of and fully understand their obligations to their tenants.

An increasing number of our residents, many of whom are vulnerable, either live in private rented property or live adjacent to it. Failure to effectively manage private sector housing can adversely affect the health and safety of tenants and can have a wider impact on the local community. In addition to poor management, a number of landlords positively exploit their tenants and often the public purse through housing benefit, by renting substandard and dangerous accommodation.

The private sector traditionally offered an alternative to social housing or home ownership. For many the private sector was seen as a short term need while they waited for an offer of council owned accommodation or were in a financially stronger position to take their first steps onto the property ladder. The increase in house prices, reduction in social housing and reduced access to mortgage funding means that this is no longer the case. Increasingly, private sector accommodation now provides a longer term or “life” home for many residents.

The continued growth in the population of Haringey, the lack of alternative housing solutions for many, means that the private rented sector will continue to play a significant role in providing accommodation. More than ever, the sector needs to be properly managed and supported to fulfil its important role.

Licensing imposes a set of standards/conditions, makes it easier for officers to gain access into a property and can allow the tenant to make a complaint without being identified. A licensing scheme can also play a much needed role in supporting landlords. Resourcing support and guidance to landlords; low level mediation between tenants and landlords and adopting a risk based approach to compliance and enforcement are all necessary as part of a scheme that offers a carrot and stick approach.

Also, the introduction of Selective and Additional licensing will enable a significant change in the way that ASB and poor management associated with the private sector is tackled. Through licensing we will know who is responsible for the management of properties that are rented out and who in the first instance is responsible for dealing with problems associated with the dwelling. It also introduces an added protection for private sector tenants. Licensing has the potential to make significant improvements to housing standards and the local environment.

We believe that licensing offers the following benefits:

4.1. The benefits for a private landlord

- Good landlords will be rewarded for their responsible letting practices by paying a reduced fee for the service and receiving a light touch inspection and compliance approach.
- Creation of a level trading environment for private sector landlords.
- Their reputation will be enhanced by holding a licence, while those bad landlords who have given private renting a poor status, will either be made to bring their properties up to the standard of the others or risk losing the right to let their properties.
- Landlords can promote their licensed status and find it easier to attract tenants who know that a licensed property is well managed and safe.
- Better management and tenancy agreements will enable the landlord to have better control over the property and will be supported in dealing with tenants who commit anti-social behaviour.
- Advice and guidance will be available on all aspects of private renting especially those landlords who are inexperienced from a dedicated discretionary licensing team of officers.

4.2. The benefits for private tenants

- Enhanced protection for vulnerable tenants living in HMO accommodation, by ensuring, for example, that the accommodation has adequate amenities, space standards and fire safety.
- Protection from possible retaliatory eviction as licensing enables the proactive checking of properties and management practices, rather than relying on the tenant to report poor conditions.
- The standards imposed will ensure that the landlord is not permitted to have more tenants than recommended for the size of the property and the facilities provided so tenants can be assured that they are not living in cramped overcrowded accommodation.
- Advice and guidance will be available to tenants so that they can understand their rights to a decent home.
- Added protection for tenants as a result of better landlord management practices and greater protection from unlawful eviction.

4.3. The benefits for the community

- There is no cost to the tax payer as the scheme is self-funding.
- Reduce the number of overcrowded properties that can lead to anti-social behaviour especially relating to noise and rubbish.
- The register of landlords / managing agents will be made public and can be accessed by neighbours who wish to report anti-social behaviour and by the Police when they are dealing with these individuals.

4.4. Existing Additional Licensing Schemes.

Since the introduction of the Housing Act 2004, two additional licensing schemes have been introduced within the borough – Harringay ward (now expired) and the Tottenham scheme. The schemes include smaller HMO's and self-contained flats which have been unlawfully converted without planning and building regulation approval. This type of accommodation is problematic within Haringey and generally tend to be overcrowded, poorly constructed and often unsafe. Through the operation of the Harringay scheme 527 properties were licensed. Where poor property conditions were identified, these were remedied through a combination of working alongside the landlord offering guidance and enforcing the licensing conditions. Issues identified included:

- **Fire/Mean of Escape** - 483 (92%) lacked adequate means of escape and fire safety measures.
- **Security** - 289 (55%) lacked adequate security measures to front/rear doors and windows and the actual room doors of the individual rooms.
- **Heating** - 141(27%) lacked adequate heating within the property and individual rooms. This ranged from no heating at all, expensive systems, no heating controls and key meter issues.
- **Management** - 373 (71%) lacked adequate management. Such as fire alarm not working, fire equipment damaged, heating and hot water broken down, dirty conditions to common parts, poor waste arrangements, failing to deal with anti-social issues and general lack of dealing with basic repairs.
- **Kitchen Provision** - 82 (16%) lacked adequate kitchen facilities e.g. inadequate numbers of cookers, sinks, work surfaces and kitchen cupboards/refrigerators.
- **Bathroom provision** - 22 (4%) lacked adequate bathroom facilities such as insufficient bathrooms for the number of occupants, lack of wash hand basins or additional separate toilets required.

The Harringay Licensing scheme has enabled us to gain access into properties and tackle severe health and safety breeches and poor management practices. It has made it easier for us to identify portfolio landlords who own multiple substandard housing units across the borough. The scheme has also led to the development of a cross-service approach to the licensing process. Following receipt of a licensing application, services are now contacted and consulted on issues relating to that particular property. This has greatly improved cross-service working and problem solving.

Landlords and managing agents often feedback that they feel disadvantaged because they believe that unscrupulous landlords appear to go undetected. The Harringay scheme has

demonstrated to compliant landlords and managing agents that poor quality properties and unlawful management practices will be addressed.

5. Alternative options considered.

Before introducing an additional Licensing and/or selective licensing we are obliged to consider whether or not there are other courses of action we can take to effectively deal with the problem. We have considered the following:

5.1. Mandatory HMO Licensing only

Through our mandatory HMO licensing scheme, we will continue to identify properties that require licensing – it will run alongside the proposed additional licensing and selective licensing schemes. However, mandatory HMO Licensing will only apply to those HMOs which are three or more storeys, occupied by five or more people forming two or more households. This type of HMO makes up only a small percentage of the overall HMO stock within the borough. It will not tackle the problems associated with other types of HMO accommodation, many of which are in poor condition.

5.2. Designate an Additional Licensing scheme only

We could designate just an additional licensing scheme to deal with the smaller HMOs across the area. However, this would exclude non HMO private sector dwellings that we have identified as causing a problem. Through our evidence gathering, we have identified areas where the number of private sector dwellings is high – equal to or above 26% of the overall housing stock - and have above average problems such as crime, ASB and fly tipping.

5.3. Do nothing and continue with existing legal powers.

Existing powers available to the council are largely reactive with officers responding to tenants' complaints. Many tenants are reluctant to complain through fear of retaliatory eviction. Although current enforcement activity has been successful in remedying problems in individual dwellings, it is not felt to have raised the standard of private sector dwellings generally. Responding to complaints often involves coordinated investigation and enforcement by numerous departments, using various pieces of legislation, before a final resolution is obtained.

5.4. Voluntary Accreditation

Although the voluntary accreditation scheme is helpful in driving up standards, it relies on the willingness of landlords to sign up to it. It is likely therefore that conscientious landlords will continue to support the scheme, but that rogue landlords will remain difficult to identify and will avoid joining the scheme, preferring instead to operate with the minimum regulation "under the radar"

We believe that the combination of a borough wide additional licensing scheme with a targeted selective licensing scheme will achieve the maximum benefit and best outcomes for the private tenants in the borough.

6. Haringey – Demographics and the Housing Stock.

6.1. Haringey's People

Haringey is an exceptionally diverse and fast-changing borough. We have a population of 267,540 according to 2014 Office for National Statistics Mid-Year Estimates. Almost two-thirds of our population, and over 70% of our young people are from ethnic minority backgrounds, and over 100 languages are spoken in the borough. Our population is the fifth most ethnically diverse in the country.

The borough ranks among the most deprived in the country with pockets of extreme deprivation in the east. Haringey is the 30th most deprived borough in England and the 6th most deprived in London.

The population of Haringey is growing and is estimated to reach 286,900 by 2020, an increase of 5.9% from 2015. By 2025 – 5 years later, it is estimated that the population will reach 300,600, an increase of 10.9% from 2015.

Population growth locally is due to higher annual births than annual deaths, and net migration gain driven by high annual international migration. Haringey has a proud history of new migrant communities living within its area, this has resulted in a vibrant and diverse borough. The top three countries for new international migrant national insurance number allocations are Romania, Bulgaria and Italy.

The table below details some key headlines from the 2011 Census:

Households	<ul style="list-style-type: none">• Increase in lone parent households, now accounting for over 10% of households. Of these around 50% are not in employment.• A third of Haringey's households are one person households.
Ethnicity and Identity	<ul style="list-style-type: none">• A decline in the White British population, but less than the decline seen across London.• 3rd highest proportion of White Other of all London boroughs.• Some of the highest levels of households with mixed identities in the country.• 45% of residents were born outside Britain, the main nationalities being: Polish, Turkish, Jamaican, Irish, Ghanaian and Somali.• 5.1% of residents have lived in the UK for less than 2 years, higher than the London average.• Christian and Muslim are the main religions and a quarter of residents have no religion.
Health	<ul style="list-style-type: none">• Similar to the London average over 4 in 5 residents consider themselves to be in good or very good health, but 14% of residents report they have a condition that limits their day to day activities.

Housing Tenure	<ul style="list-style-type: none"> Home ownership has decreased to 38.9%; the London rate remains considerably higher than Haringey at 48.3%. The proportion of households that are privately rented has seen a major increase to 31.5%. This is amongst the highest of all London Boroughs. Over occupancy is up significantly, with 16.3% of households now over occupied by at least one bedroom. This is much higher than the London rate of 11.6%.
Qualification and Labour Market.	<ul style="list-style-type: none"> Significant reduction in the proportion of residents over 16 with no qualifications. A reduction in full time workers and a big increase in part time and self-employed workers. More people have never worked or are long term unemployed than in the London average.

6.2. Overview of housing in Haringey

The type of housing tenure in the borough has changed significantly in the period between the 2001 and the 2011 Census. In 2001 the overall number of properties totalled 92,170, this increased to 101,955 in 2011. Owner occupied properties accounted for 45.8% in 2001, decreasing to 38.8% by 2011. The table below confirms that the number of private rented properties has increased in the borough by 45.6% during the 10-year period.

Change in tenure type – 2001 to 2011

Tenure group 2011	Number	Change 2011 v 2001		
		%	+/-	+/- (%)
Owner occupied	39,603	38.8	-2,637	-6.2%
Social housing	27,242	26.8	-648	-2.3%
Private renting	32,095	31.4	10,055	45.6%
Living rent free	1,482	1.5		
Total	101,955	100	9,785	10.6%

6.3. House prices, affordability and demand

Demand for housing has reached such high levels in Haringey that to address both projected newly arising need and the current backlog, Haringey's 2014 Strategic Housing Market Assessment (SHMA) identified that between 2011 to 2026 over 20,000 new homes are needed.

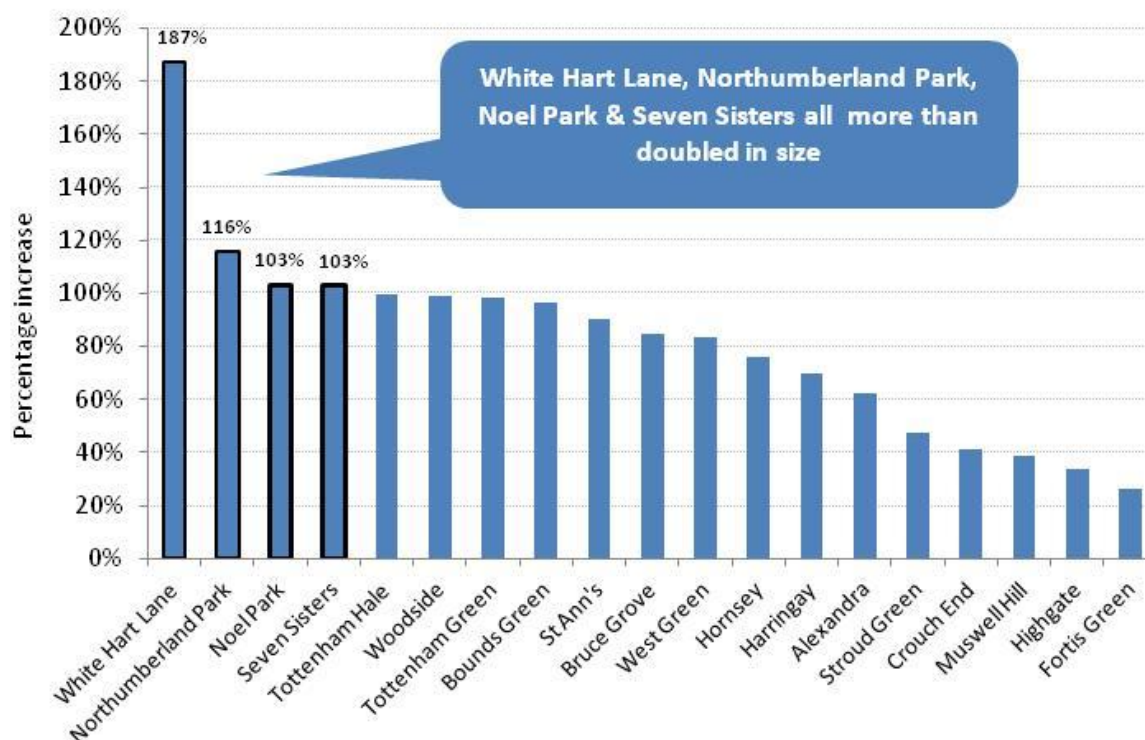
Even if we could meet the demand for housing, for many owning a property is becoming increasingly unaffordable. An estimated median household income in Haringey of around £35,400 means that an average two-bedroom flat costing £440,947 is too expensive.

The demand for owner occupied housing is matched by the demand for social housing. The Council currently has a duty to over 3000 homeless households – the second highest number of homeless households in temporary accommodation in London. Increasingly, social housing is becoming an option only for those in the most acute need.

6.4. The private sector

The private sector in Haringey is growing; a third of our residents already rent privately. Lettings of private rented homes in Haringey now outnumber lettings becoming available through the Council or Housing associations. As the graph below illustrates, the increase in the private sector between the 2001 and 2011 Census has been a feature in all wards within the borough.

Increase in the private sector by ward level



Nationally the private rented sector makes up 19% of the total housing stock in England and 26% in London. In Haringey the borough average is 31% with 18 of the 19 wards scoring above the national average and 15 wards scoring above the London average. Harringay ward in the south east of the borough is now made up of over 45% private sector dwellings. Overall, the growth in the private rented sector between the 2001 and 2011 Census is 45.6%

Private rent levels are also rising sharply in Haringey with the average weekly rent for a two-bedroom property (measured in June 2016) being £430. 4485 private sector tenants in the borough are in receipt of housing benefit.

There is a growing demand for low cost private rented accommodation. This is partly fuelled by the Government's welfare reforms and the rise in migrant workers coming to Haringey. In 2015/16 the Department for Work and Pensions completed just over 15000 new national insurance registrations for overseas nationals in Haringey. This demand has, in itself, created a housing market that is very lucrative for rogue landlords.

Restrictions on the amount of Housing Benefit that can be claimed by single people under the age of 35 has substantially increased the demand for shared HMO type housing. We estimate that up to 50% of the total number of private sector dwellings in the borough are now HMOs. Many are smaller HMOs that have been poorly converted; often carried out without planning permission.

The increase in the number of people renting privately has increased the demand for advice and assistance. An analysis of tenants contacting the Housing Advice Centre over a 3-year period confirmed that nearly 4000 tenants had approached the service. Queries included unlawful eviction, harassment and rent arrears. In 2015/16, there were 603 new statutorily homeless households of which 60% were evicted from a private rented property. In over half these cases, the landlords ended the tenancy without declaring any grounds relating to a breach of tenancy.

6.5. Conclusion

It is clear that access to social and affordable housing will remain scarce. The ability for our residents to buy their own home has decreased over the years. Reduced access to mortgage funding, the need for a sizable deposit and the average house price for a two - bedroom flat costing £440,947 against an average household income of around £35,400, means that home ownership is for many no longer a reality.

The continued growth in the population of Haringey, the lack of alternative housing solutions means that the private rented sector will continue to play a significant role in providing accommodation. We know that many of our households are on low income – levels of deprivation in Haringey are high. We also know that overseas migrants tend to strongly rely on the private sector market, a report by the Joseph Rowntree Foundation estimated that nationally 75% of migrants use private sector accommodation.

Low cost shared accommodation offers a good solution to those who are unable to rent larger properties or who live alone. But the property needs to be of a reasonable condition and offer a safe environment. The level of case work picked up by the Housing Advice Centre suggests that many landlords either lack the necessary experience and expertise needed to manage properties or wilfully neglect their responsibilities. The demand for private sector accommodation is such, that even properties in the poorest of conditions can be readily let – demand heavily outstrips supply.

More than ever, the sector needs to be properly managed and supported to fulfil its important role.

7. Links to other strategies

Extending our Additional Licensing scheme to cover the remaining HMOs in the borough and introducing selective licensing to part of the borough will complement and work alongside the Council's other strategies and priorities. We do not see licensing as a panacea to remedy all that is wrong or needs fixing in the borough. Rather it is part of a wider ambitious set of plans that will, over time, improve the lives of our residents. All our strategies have clear inter-linked aims and all recognise that decent housing is the bedrock of people's lives and leads to improved community relations, less anti-social behaviour, increased job prospects and better health outcomes.

7.1. The Council's Housing Strategy

Haringey's Housing Strategy sets out the strategic direction for housing activity in the borough, including housing need, supply and approach to quality and management of existing and new stock. Our 2017 to 2022 Housing Strategy recognises that the housing landscape has changed significantly, and that radical change is necessary to meet the demand for quality housing.

Haringey's housing strategy has four key strategic objectives:

- Achieve a step change in the number of new homes being built.
- Improve support and help to prevent homelessness.
- Drive up quality of housing for all residents.
- Ensure that housing delivers wider community benefits.

To meet the need for more homes we will require developers to provide up to 40% on site affordable housing on schemes of ten units or more. To further encourage a thriving private rented sector, we will support *private rented housing development* through:

- Encouraging new sources of private investment to enable the development of new high quality purpose built private rented accommodation.
- Promote with developers of large schemes the inclusion of private rented accommodation as part of an overall mix of housing.
- Covenant new private rented development for an appropriate period to ensure it remains available long term.

Haringey's ambitious growth agenda is equally matched in its commitment to ensure that the borough's existing homes are maintained and managed to the highest standards.

The Council has most control over its own stock of 16000 rented properties and 4500 leasehold properties. As at 31st March 2017, 79.85% of the Council's stock met the Government's decent homes standard, and through the Council's Capital investment programme and reactive repair service, the stock will continue to be well maintained and improved.

In terms of our role with Housing Associations we will continue to achieve shared high standards for managing homes, based on common management standards such as housing management, repairs and customer care.

In terms of the private rented sector, our priority is to improve the quality and reliability of homes in this sector. To meet this priority, we have committed to continue encouraging private rented sector landlords and lettings agents to sign up with the London Landlord Accreditation Scheme. We have also committed to use our statutory powers, including the various options for licensing schemes.

Haringey's Housing Strategy recognises that housing is interlinked with a number of other issues. Some of these are particularly relevant to the private rented sector and the effect well-maintained, good quality housing has on the borough as a whole. Our priorities include promoting independence, health and wellbeing, and providing stable, safe well-managed homes in decent environments. We have committed to improving health by tackling poor quality homes in the private sector and especially the private rented sector, where the highest levels of serious repairs and hazards occur.

7.2. How does licensing help?

The priorities for the private rented sector articulated in the Council's Housing Strategy go hand in hand with licensing. Interventions such as licensing can bring about an uplift in the quality of the sector through eliminating poor management practices and property conditions and reducing ASB that can adversely affect a neighbourhood. It offers private sector tenants added protection and supports a thriving, much needed, private rented sector through working with landlords to address concerns, raising awareness of good practice and driving out rogue landlords.

7.3. Empty properties

The Council takes a dual track approach of advice and assistance to help owners return their property into use, combined with tough enforcement interventions where the owner refuses to engage or is unwilling or unable to take action. The number of empty properties has reduced as a result of the above and the buoyancy of the housing market in Haringey.

7.4. How does licensing help?

Licensing will help us to identify empty properties more easily. Through enforcing housing conditions and educating landlords, we will improve the private sector offer in Haringey. A thriving private sector should lead to less properties becoming vacant for longer periods.

7.5. Physical, social and economic regeneration.

Haringey's wide ranging regeneration plans not only seek to improve the physical environment but aim to build community resilience and offer residents and businesses the personal, social and economic tools to overcome challenges. Plans include:

- **Tottenham Regeneration**

Tottenham is the next chapter of London's regeneration story. It's one of the first of the Mayor's flagship housing zones and is already seeing the benefit of more than £1billion of public and private investment to transform the area. Our aim is to deliver at least 10,000 new homes and 5,000 new jobs by 2025.

Underpinning the vision are the following 7 strategies for success:

- **World-class education and training** – to complement our outstanding rated schools we will attract new schools and new providers – including a major educational institution.
- **Improved access to jobs and business opportunities** – working to attract major investment and to deliver local business growth to provide new jobs in and for Tottenham.
- **A different kind of Housing Market** – an ambitious programme of estate renewal and a range of houses at a range of prices to ensure that people get access to a quality home.
- **A fully connected community with even better transport links** – Crossrail 2 and further rail improvements will see high frequency rail services connecting Tottenham with central and other parts of London.
- **A strong and healthy community** – Tottenham's community is its strength. We will build an even stronger community pride and provide better and more connected public, voluntary and youth services.
- **Great places** – through investment and bold planning measures we will create great town centres, public spaces and streets.
- **The right investment and high quality development** – we will work with the local community to ensure that any investment is of the highest quality and best design.

Through the Housing Zone, the Council will seek to place an emphasis on accelerated delivery and supporting an increased range of housing options in Tottenham. In support of this, the proposed delivery target for the Housing Zone is a 50:50 split between private and affordable provision. The private provision includes an emphasis on home ownership and on supporting an improved private rented sector.

- **The Haringey Development Vehicle (HDV)**

The HDV is a proposed 50/50 partnership between Haringey Council and property developer Lendlease to oversee the transformation of council-owned land and assets and deliver thousands of new homes and opportunities to the borough. The HDV is expected to deliver more than 6,000 new homes during the coming 15-20 years, alongside other major improvements such as new schools, health facilities, open spaces and town centres.

- **Wood Green Regeneration**

Wood Green is the borough's biggest town centre and although already a thriving shopping and eating place, we believe it has massive potential. Planned improvements to the

Piccadilly Line will increase capacity by 2025 and further investment is also planned on the Great Northern Line which runs through nearby Alexandra Palace. We are also hopeful that Crossrail 2 will include Wood Green.

Our local plan highlighted Wood Green as a growth area; it will also be confirmed as a new opportunity area in the next London Plan. Our regeneration plans for the area include:

- Revitalizing and refreshing the town centre
- Bringing more restaurants, cafés and places to socialise whether in the day or the evening
- Creating more welcoming public spaces
- Making the most of Wood Green's location for our neighbours in Alexandra Palace and the rest of London
- Building 7,700 new homes that current and future residents can afford
- Redeveloping unused industrial sites and other utilities to create local and London-based businesses
- Creating 4,000 jobs
- Making Wood Green one of the best places to shop, eat and drink in London
- Making residents proud to live in Wood Green

- **Economic Development and Growth - A plan for jobs, growth and prosperity.**

Matching our ambition for physical regeneration is our ambition for economic growth and our approach is that any benefit brought about by our major regeneration programmes translate into great opportunities and prosperity for our residents. Haringey's Economic Development and Growth Strategy sets out a vision to carve out a unique role for the borough within London; securing our own economic future and contributing to the capital's too.

Our long-term aim for the borough is to ensure that, by 2030, we are:

A fully employed borough, by which we mean:

- 75% of Haringey's working age population is in work.
- Residents' full time earnings are in line with London averages for bottom quartile and median earners.
- The proportion of working age residents qualified to NVQ Levels 3 and 4 is increased from 65% (2013 figures) to 70%.

A more dynamic borough, by which we mean:

- The number of jobs in Haringey has increased by 20,000 from the 2011 London Plan baseline position.
- The profile of Haringey-based jobs changes so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly skilled sectors, such as sustainable technology, digital design and skilled/craft manufacturing.
- The number of jobs per square metre of employment land has increased by 20%, reflecting a shift to more intensive and productive employment.

7.6. How does licensing help?

Licensing will complement our regeneration plans by ensuring that more people have access to decent accommodation. Failing standards identified through compliance checks will be addressed through guidance and enforcement of the housing conditions.

Landlords will benefit from the Council's regeneration plans – the sector will continue to grow and thrive in a borough where people will choose to live. Under licensing landlords will have to take the same responsibility for their properties as they would for any other business - landlords will have to either improve their practice or leave the market. Improved landlord practices should reduce the number of evictions and unplanned moves. Populations should be less transient and improvements for the borough should become more sustainable, benefiting the better landlords, tenants and Haringey as a whole. Licensing supports our regeneration aims.

7.7. Homelessness and temporary accommodation

Within London, Haringey has the second highest number of households living in temporary accommodation because they are homeless. The main reason for homelessness in Haringey is loss of a private rented sector tenancy. Often because households experience financial difficulties that lead to rent arrears or because a landlord's wish to charge increased rents that are not affordable for the current tenant.

Our focus is on sustaining current housing where practical and preventing housing problems escalating to crisis point. This usually means sustaining licences or existing tenancies in the private rented sector. Where appropriate we work closely with each person or family in housing crisis to assist with benefits, gaining employment or financial management advice to prevent homelessness through rent arrears.

In addition, we build relationships with local landlords and offer a range of packages and incentives to enable households to move into or remain in the private rented sector.

Where homelessness cannot be prevented, we provide emergency temporary accommodation. Competition for affordable good quality private sector housing provides a significant challenge for Haringey. We maximise the supply of temporary accommodation and work closely with landlords and managing agents within Haringey to provide private sector leased accommodation and annexes (nightly-charged self-contained accommodation)

7.8. How does licensing help?

Licensing, by raising standards of management and property conditions will further help to increase the supply of good quality homes in the private rented sector. At the same time, it can address instances of poor management that may lead to households losing their homes and presenting as homeless. Licensing also helps the Council to build a relationship with local landlords and identify those who may be willing to work alongside the council's homelessness team to enable easier access to temporary accommodation.

More importantly, licensing offers additional protection for assured short-hold tenants. Licensing precludes a landlord from serving a notice under section 21 of the Housing Act 1988 (notice requiring possession) if the landlord has failed to licence the property.

7.9. Crime, Anti-Social Behaviour and fly tipping

Last year the Council brought together a number of enforcement activities under one management umbrella and increased front line resources in this area. Promoting partnership working, the unit now operates under an area based structure that geographically mirrors the three Metropolitan Police Cluster Areas. Three newly created Enforcement Manager posts play a pivotal role in coordinating services, using intelligent led data and information to tackle hot spot areas.

Fly-tipping remains a top priority for our residents. During the first three months of 2017 over 2,700 fly-tips were reported by residents in Haringey. These reports are up by 29% on the same period last year. Fly-tipping costs taxpayers in Haringey more than £3million a year.

Supporting our joined up enforcement model and to tackle the increasing problem of fly tipping and littering the Council has engaged the services of Kingdom Security Ltd. Kingdom provide a uniformed warden service offering a visible deterrent against littering and an enforcement function through the issuing of Fixed Penalty Notices (FPNs) A responsive service is deployed to tackle:

- Litter enforcement.
- Dog fouling.
- Timed collection enforcement.
- Fly tipping and trade waste enforcement.

The above are largely governed by the Community Safety Partnerships' annual Strategic Assessment findings and the delivery of MOPAC 2017 priorities.

Burglary, Property Crime and Anti-Social Behaviour are all high priorities for the Police in Haringey. Together with partners, they work to combat and reduce these issues, which are often more acutely observed in denser housing settings with higher turnover of residents.

Property marking schemes using invisible smartwater DNA solutions have proved very effective in reducing and detecting property crime and has led to successful prosecutions of those handling stolen goods in the Borough.

Prolific offenders are monitored and supported to tackle their re-offending while being intrusively supervised to prevent, deter and detect crime.

The Police, council and housing associations work closely together to tackle anti-social behaviour, sharing information and using the powers and lever of the various agencies to effect a change in behaviour and reduce the impact of crime and ASB.

7.10. How does licensing help?

We know through our evidence gathering that there is a significant and persistent problem with ASB directly linked to private sector properties. Licensing will support existing anti-social behaviour initiatives by requiring landlords to take action against their tenants, by ensuring that household waste is correctly disposed of and that front gardens are maintained and free from rubbish.

Licensing will give the Council additional powers to deal with housing related crime. The existence of a landlord register will make it easier for the both the Police and the Council to trace the owner of the property.

7.11. Article 4 Planning

In 2013 Haringey implemented an Article 4 direction to manage the growing trend of over concentrations of HMOs in the east of the borough and the resulting loss of single family dwelling houses. Prior to the Article 4, current planning legislation allowed a family dwelling to change to a small HMO without planning permission. Through the Article 4 the Council is able to better manage the impact of small HMOs and ensure that through the planning application process, they are meeting high standards.

7.12. How does licensing help?

Planning policy plays an important role in tackling poor housing design and the Article 4 direction has been helpful to halt the growing concentrations of HMO in the east of the borough. Licencing will ensure that property and tenancy management practices are improved. Our compliant checks and inspections will identify landlords who choose to operate unlawful HMO's in breach of planning and building control regulations.

7.13. Conclusion

From the aims within our Housing Strategy to Planning Policy and our regeneration plans we are striving to improve the quality of housing in the borough. Licensing will complement this aim.

Through our work with Housing Associations and through the management of our own housing stock we can promote good housing management and ensure that tenants have protected rights and enjoy a safe, warm and decent environment to live. We believe that licensing will go some way to ensuring that private tenants are afforded the same.

We will no longer tolerate fly-tipping and we will be proactive in reducing ASB and crime through working closely with our partners. Licensing conditions will enable us to set clear standards of behaviours for both landlords and tenants.

We want to see health in-equalities reduced and more people accessing decent accommodation when unfortunate enough to find themselves homeless. We know that some of the borough's most vulnerable tenants live in privately rented accommodation, we believe that licensing will add an additional layer of protection and go some way to improving their lives.

8. Methodology

In order to meet the requirements of the Housing Act 2004 for introducing additional and selective licencing (as outlined in section 2 of this report) the local authority must establish:

- The existence of a significant and persistent problem of anti-social behaviour (selective licensing only)
- That problems of ASB are directly related to private sector properties (selective only)
- That some or all private sector landlords who have let premises in the area (whether under leases or licence) are failing to take action to combat the problem.
- A significant proportion of the HMOs in the borough are being managed sufficiently ineffectively.

For the purposes of the above, we have analysed data at both a ward level and a Lower Super Output Area (LSOA). In order to establish a true picture of how all the statutory grounds (as outlined above) impact on Haringey, we gathered together all available appropriate data sets and analysed them accordingly.

8.1. Ward level analysis – Stage 1

Haringey is made up of 19 wards. Wards offer a recognisable geographical area and are typically used by local authorities to analyse and compare data within the borough boundary.

8.2. The size of the private sector housing

Census data was used as a basis for assessing both the total number and growth of the private sector. The 2011 census identified just over 32,000 private sector dwellings across the borough.

8.3. Supporting data

Data to establish the extent of ASB, crime, immigration deprivation and housing conditions within the private rented sector in Haringey was sourced from the following:

- Council held records – Environmental reports – fly tipping, litter, flyposting, graffiti and reports of problems with pest (mice, rats, bed bugs etc.)
- ASB and noise reported to both the Council and the local Police.
- Crime reports – Haringey crime recorded by the Metropolitan Police Service.
- Housing Conditions - Complaints about private sector properties, including the condition, safety and management problems together with category 1 and 2 (high risk) reports.
- London Fire Brigade incidents.
- IMD 2015 - The index of multiple deprivation report for 2015 was used to establish the level of deprivation in the borough.
- National Insurance Registrations (NINOs) were used to establish levels of overseas migration.

Data was then analysed from April 2014 to March 2017 as follows:

- Duplicates were removed and an equal weighting applied to each indicator.

- A ward index score was generated for each indicator to identify high scoring wards relative to the borough average.
- The average index score across all indicators was then calculated to identify the top scoring wards.
- The priority of each ward was based on the number of incidents – the more incidents of crime, ASB, complaints etc. the higher the priority.

The table overleaf details the findings and represents the following: -

- The scores entered under each indicator by ward represent the ranking.
- An index score of 100 indicates that the ward has an average rate when compared with the borough average.
- Any score above 100 indicates that there is a higher than average rate – this suggests that the area suffers from a higher number of incidents.
- A score below 100 indicates a lower than borough average – fewer incidents.

Also listed in the table for each ward are:

- The estimated ratio of private sector dwellings within each ward.
- The percentage of Haringey area (Hectares).
- The number of private sector dwellings at the last census count in 2011.
- The borough percentage of private sector dwellings.

Example – Northumberland Park.

For example, if we consider the ward of Northumberland Park and look at the ranking under each heading, the findings are:

- It ranks above average (scores are over 100) for: deprivation; overseas migration; crime; London Fire Brigade incidents; ASB reported to the Police; housing conditions, environmental crime, noise and problems with pests.
- 24% of all properties in the ward are private sector dwellings.
- The area covered by the ward of Northumberland Park makes up 6.4% of the overall size of Haringey.
- It has 1435 private sector properties which accounts for 4% of the overall number of private sector properties in the borough.

Ward	IMD (Deprivation) Rank	NINO (Migration – oversees)	Crime	LFB Incidents	Police CAD ASB	Cat 1&2 (H&S) Index	Private sector housing complaint	Enviro Crime	Noise Index	Pest Index	% (ward level) ratio of PRS	Mean Index	% of Haringey Area (Hectares)	PRS count (2011 Census)	Borough % of Census PRS count
Northumberland Park	175	137	149	193	157	314	183	83	100	229	24%	172	6.4%	1,435	4%
Tottenham Green	145	153	177	139	171	358	127	138	129	129	28%	167	4.6%	1,779	6%
Noel Park	127	162	222	95	175	136	110	174	141	82	27%	142	4.2%	1,620	5%
Bruce Grove	134	144	100	107	103	178	170	116	90	82	30%	122	3.1%	1,758	5%
St Ann's	108	183	90	99	91	206	116	119	84	93	33%	119	3.7%	1,938	6%
Harringay	97	167	103	92	120	95	105	123	124	44	42%	107	5.3%	2,493	8%
Woodside	102	143	97	76	80	118	115	145	98	83	34%	106	5.0%	2,021	6%
White Hart Lane	153	83	100	74	98	136	93	87	96	129	17%	105	5.7%	888	3%
West Green	121	122	107	103	119	0	90	102	72	211	26%	105	4.7%	1,441	4%
Tottenham Hale	138	136	120	88	108	0	97	78	107	128	24%	100	6.5%	1,416	4%
Seven Sisters	109	124	92	122	102	49	94	84	102	118	31%	99	4.4%	1,838	6%
Bounds Green	96	96	85	92	100	0	75	106	85	75	30%	81	4.7%	1,895	6%
Hornsey	91	27	77	145	90	0	68	89	139	64	26%	79	3.6%	1,585	5%
Stroud Green	70	55	63	98	74	85	32	86	84	114	30%	76	3.7%	1,661	5%
Crouch End	47	39	70	87	72	0	91	88	103	38	35%	63	4.9%	2,169	7%
Highgate	51	45	62	83	42	31	87	71	101	56	35%	63	8.4%	1,966	6%
Muswell Hill	45	29	71	81	82	0	26	74	105	67	28%	58	5.6%	1,372	4%
Fortis Green	47	41	60	75	69	81	26	66	58	39	31%	56	6.7%	1,703	5%
Alexandra	44	16	56	50	47	0	141	35	72	64	22%	53	8.8%	1,117	3%

8.3. Ward Findings

The analysis of the data at a ward level confirmed that:

- There has been a 45.6% increase in private rental households in Haringey between 2001 and 2011
- All wards have experienced an increase in private sector dwellings between 2001 and 2011.
- 33% of households in Haringey are privately rented. This is 14% more private rental properties than the national average of 19%*.
- Of the 19 wards, 11 wards have 30% or more private sector dwellings with only 1 ward – White Hart Lane -scoring below the national average of 19%.
- Northumberland Park and Tottenham Green score highest, at 3 times the average, for category 1 and 2 complaints.
- Noel Park has the highest ranking for crime (over twice the London average) and ASB and environmental crime.
- The top 4 priority wards overall are: Northumberland Park, Tottenham Green, Noel Park and Bruce Grove.
- Of the 10 wards with an overall score of 100 or below, 8 attract an above average ranking for at least one of the indices, with two wards scoring above average for 6 of the 10 indices.

8.5. Persistent and Significant

The ward level data was further examined to ensure compliance with DCLG guidance and to test whether problems associated with private sector dwellings were both significant and persistent. DCLG guidance suggests that the following categories are used for crime and ASB:

- **Crime** – Burglary, criminal damage and arson, theft (excluding theft from shops and handling stolen goods).
- **ASB relating to tenants' behaviour** – neighbour nuisance, noise, animal related problems, vehicle related nuisance
- **Environmental crime** – Graffiti, fly tipping and litter around the property.

In addition to the above, we further analysed complaints received directly from the public relating to private sector dwellings and category 1 & 2 hazards.

In order to prove that there is a significant and persistent problem, we were able to make a direct match to a private sector dwelling where a Unique Property Reference Number (UPRN) was available. A UPRN is a unique 12-digit number assigned to every property in the borough. Where we were unable to use a UPRN (for example incidence of fly tipping) we applied a 25 metre buffer around the property. Crime data is only available at a borough level and therefore comparisons were made with the national average. Where available, we analysed 3 years' worth of data to consider the trend.

8.6. Crime and Anti-Social Behaviour

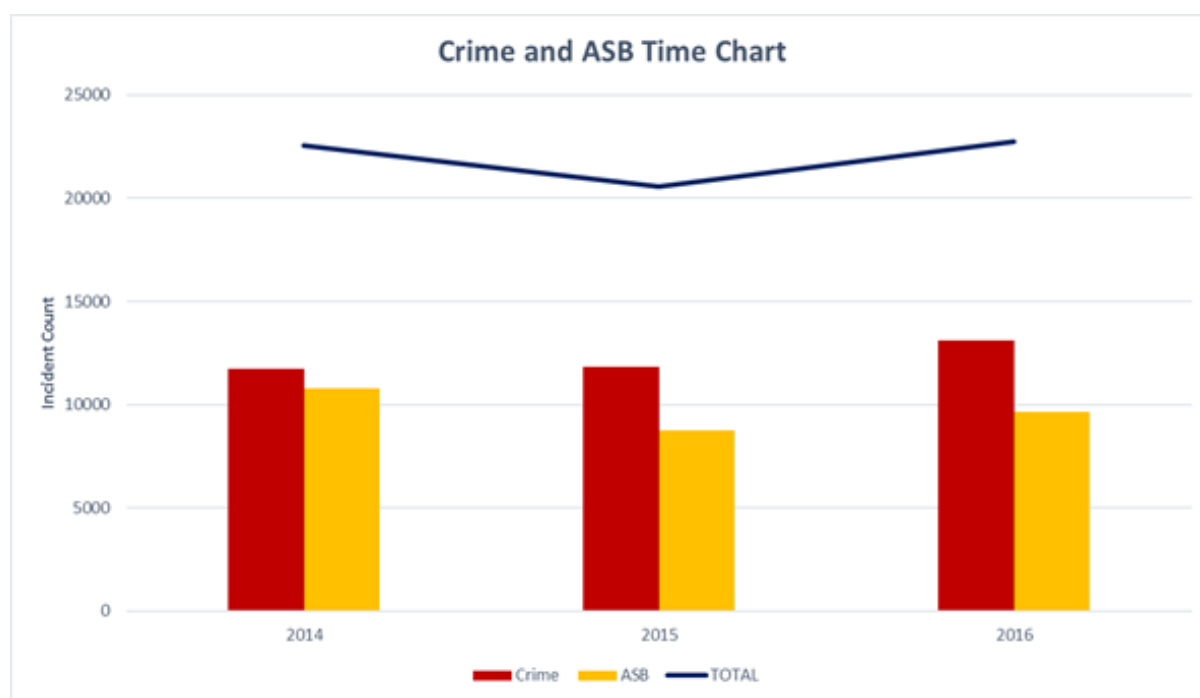
The overall crime and anti-social behaviour (ASB) rate in Haringey is above that of the national average. For overall recorded crime i.e. Total Notifiable Offences (TNO), there were an average of 101.8 incidents per 1,000 people in Haringey, compared to 70.0 per 1,000 people nationally, in 2015-16.

This is also the case for several sub-categories of crime; the domestic burglary rate in Haringey was recorded at 6.8 per 1,000 people, which is double that of the national average (3.4 per 1,000 people). Overall theft offences were recorded at a rate of 38.7 per 1,000 people in Haringey, compared to 30.8 per 1,000 people nationally. When theft from shops and handling stolen goods are removed from this category, Haringey's rate of 31.3 per 1,000 people remains above the London average (29.9 per 1,000 people).

Haringey's recorded rate of criminal damage and arson - 8.1 per 1,000 people, is slightly below the national average of 9.5 per 1,000 people.

The rate of anti-social behaviour reported to the police in Haringey is above that of the London average, with 34.9 incidents reported annually per 1,000 residents, compared to 33.7 for London.

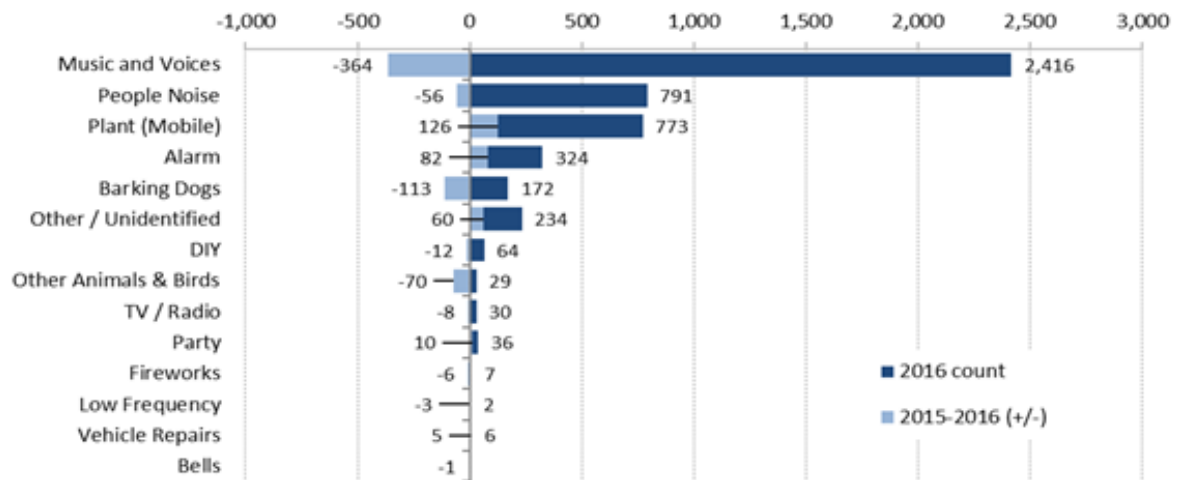
As shown in the time chart below, recorded crime (burglary, theft and criminal damage) and ASB levels have remained relatively consistent between 2014 and 2016. A small reduction was experienced in reports made in 2015, but these increased once again in 2016.



8.7. Noise complaints

Noise complaints received directly by the Council were analysed between the period January 2016 to December 2016. The total number of complaints recorded during this period totalled 19,942. From the total we extracted and analysed complaints recorded as: private rented; unknown and blank - the number of complaints totalled 15,923, (80%) of the overall total.

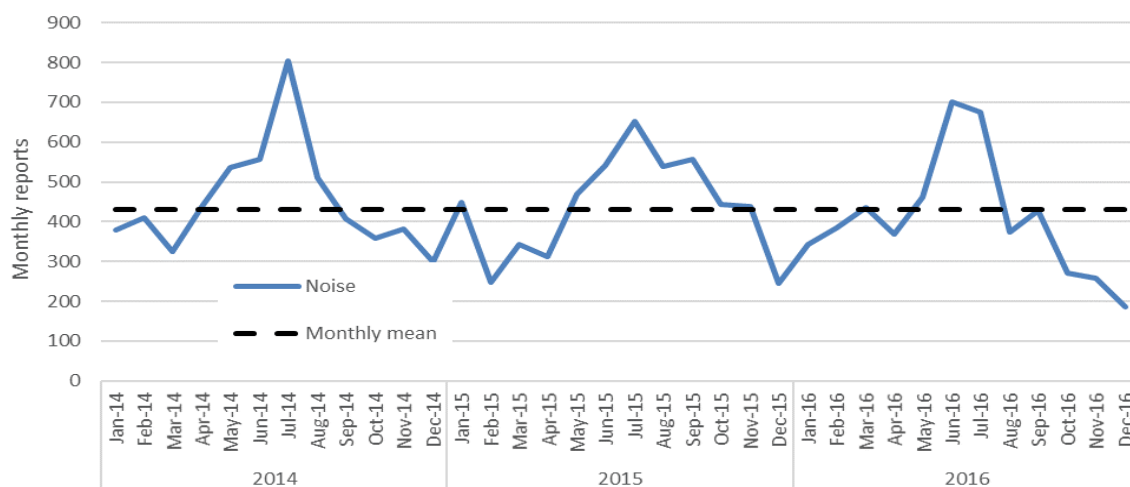
Noise complaints: Jan 16 – Dec 16



Removing data relating to machinery and public address systems left a total of 15,522 complaints. Of these, music and voices accounts for over half (53%) of all complaints over the period. This is more than three times higher than the next highest ranked complaint for people noise (16%). These two complaint types alone comprise almost 7 out of 10 of all complaints from private rented properties for this period.

The graph below illustrates the trend over a 3-year period. Over the 3 years 15,000 noise complaints were received, averaging around 431 per month. The volume of complaints peaks during the summer months and although showing a slight reduction over the period levels remain high.

Monthly trend for Noise complaints: Jan 14 – Dec 16

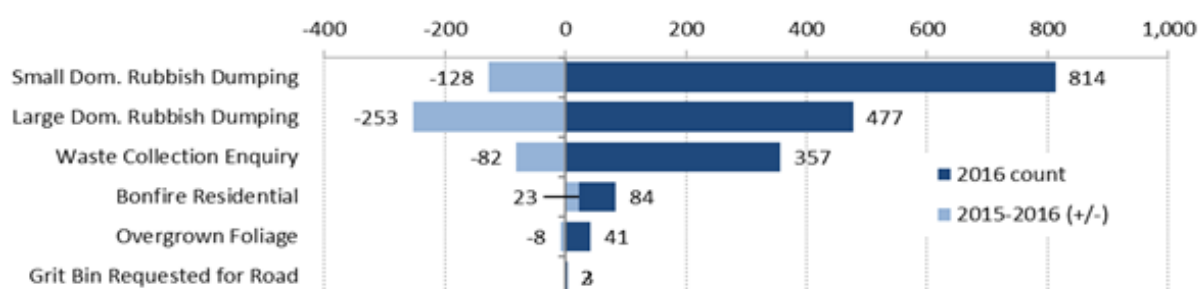


8.8. Environmental Crime

Reports of environmental crime/queries were analysed from January 2016 to December 2016, a total of 13,585 recorded complaints were received. Of the 13,585, we could confidently identify 6,641 relating to private sector dwellings.

The graph below details the findings:

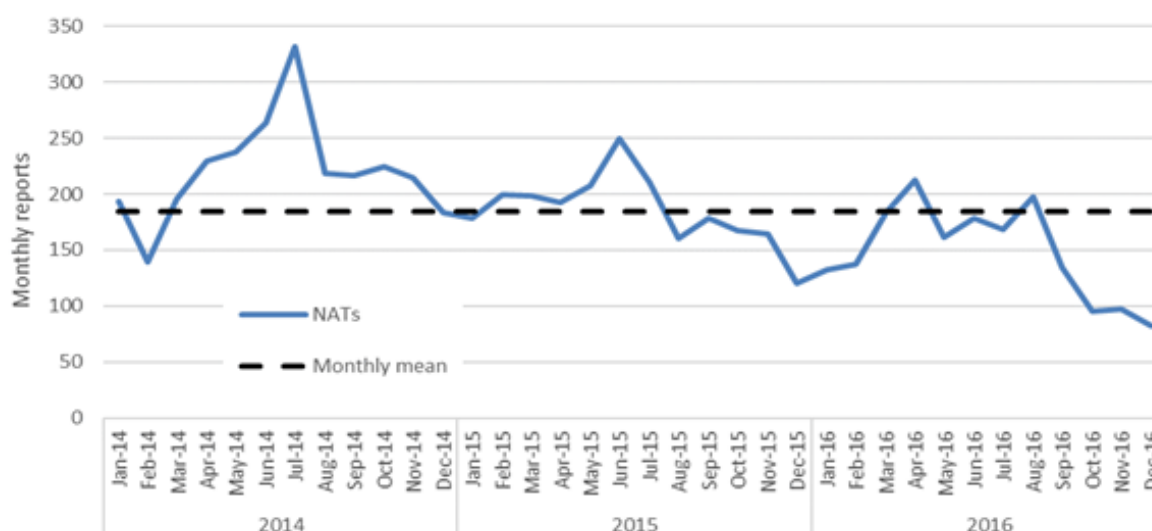
Environmental crime/queries January 2016 to December 2016.



The above confirms that small domestic rubbish dumping and large domestic rubbish dumping account for nearly three-quarters (72%) of all complaints.

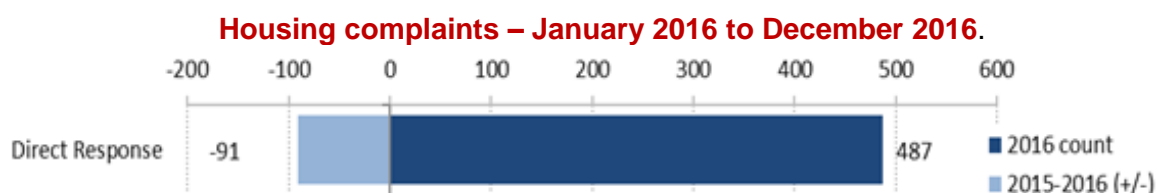
Analysis over a 3-year period confirms a decline in the number of complaints, but domestic rubbish dumping makes up the majority of complaints with seasonal peaks in the summer period.

Monthly trends - January 2014 to December 2016



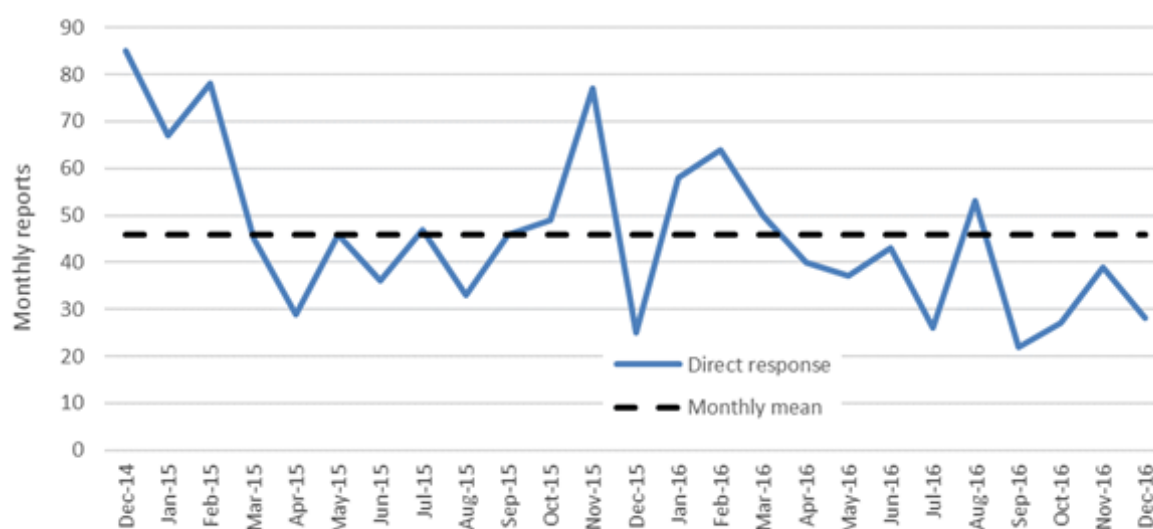
8.9. Housing Conditions

Three data sets were evaluated to assess poor housing conditions: housing disrepair; Category 1 & 2 hazards and pest control. For the period January 2016 to December 2016, 1,904 housing complaints were received. Of those, 1,150 (59%) related to housing disrepair.



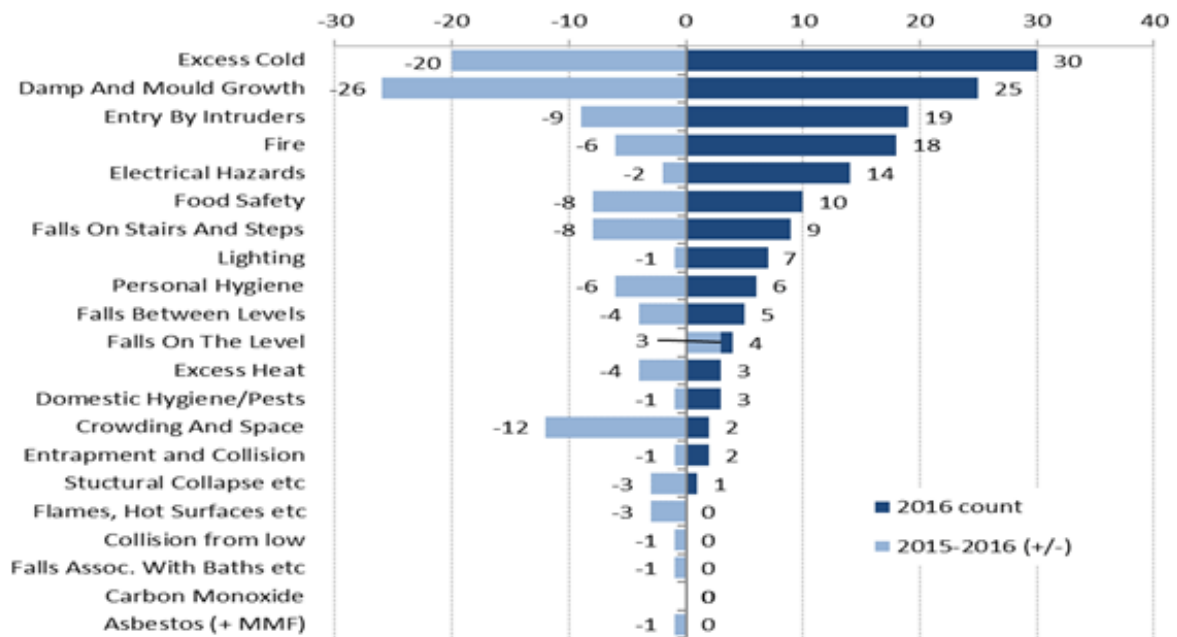
Analysing the data over a 3-year period confirms that on average 46 reports are received monthly. Again, seasonal peaks are evident with the majority of complaints received during the winter months. A dip sample confirms that the majority relate to damp and lack of heating.

Housing disrepair monthly trends - January 2014 to December 2016



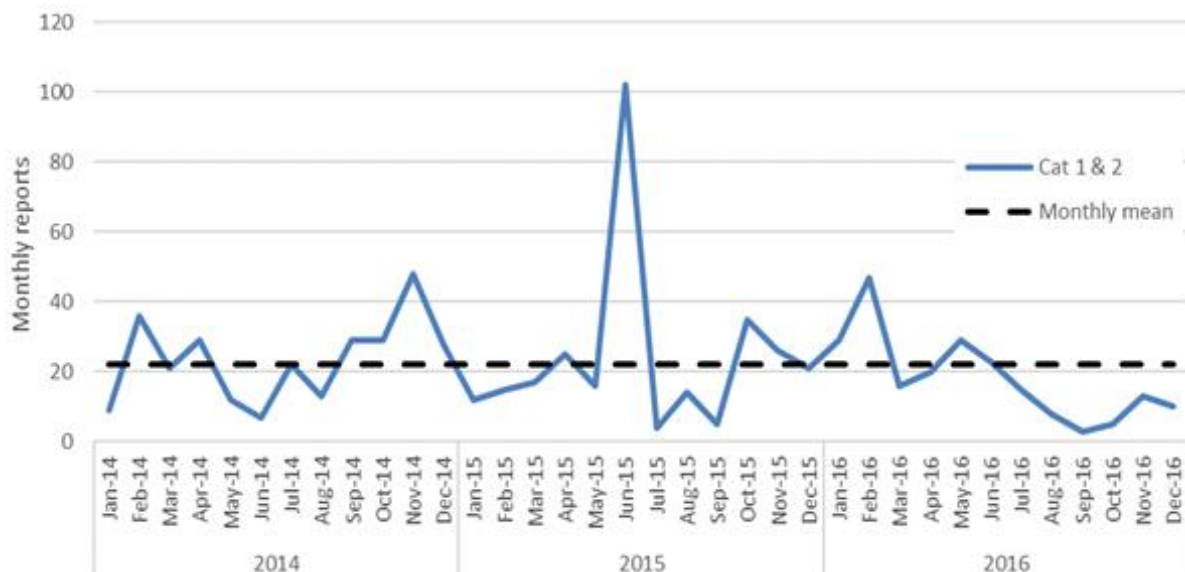
1,041 category 1 & 2 hazards were recorded between January 2016 and December 2016. 719, 69% related to private sector dwellings. The two most common types were excess cold (19%) and damp and mould growth (16%). Entry by intruders and fire are ranked third and fourth highest with 12% and 11% respectively. Collectively these four hazards make up over 58% of all hazards.

Category 1 & 2 Hazards – January 2016 to December 2016



The monthly trend illustrated in the graph below, shows an overall consistent level of reporting over the three years with three distinct peaks for November 2014, June 2015 and February 2016. The main spike in June 2015 related to 102 reports, more than four times the monthly average of 22 and driven mainly by reports of excess cold (19), damp & mould growth (15), fire/entry by Intruders (8) and electrical hazards.

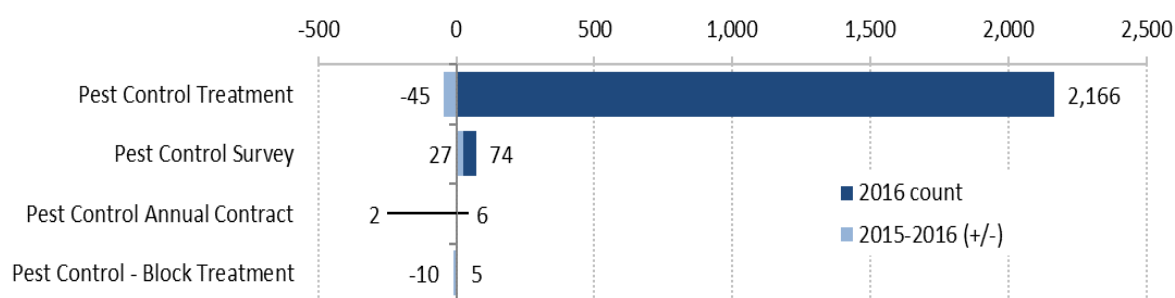
Category 1 & 2 Hazards monthly trends - January 2014 to December 2016



Pest control complaints received during January 2016 and December 2016 confirmed a total of 7,168 recorded incidents made up of 26 types: bed bugs; cockroaches; fleas; mice/rats; pigeons and wasps. Mice complaints account for 41% followed by complaints about rats at

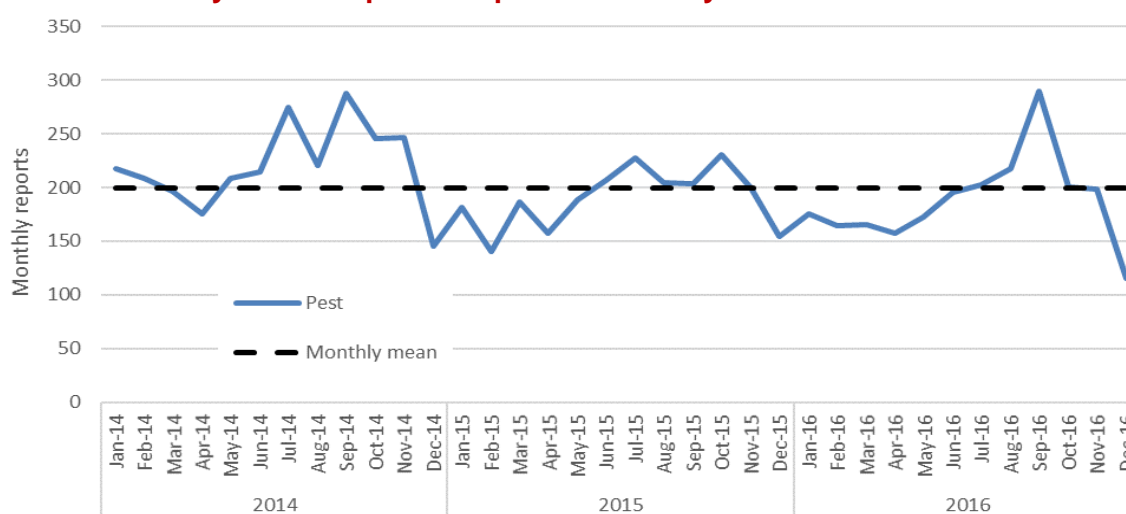
6%. Collectively these two types make up over half (57%) of all pest complaints for the period. Cockroaches and bed bugs make up a further 16% and 12% respectively.

Pest control complaints: January 2016 to December 2016



Over a 3-year period, 7,000 pest control complaints were received, averaging 199 per month. The trend shows the pattern to be seasonal with raised activity levels during the summer period from July to September each year.

Monthly trend for pest complaints: January 2014 – December 2016



8.10. Ward conclusion

Analysis of data at a ward level was useful and confirmed that the growth in the private sector was borough wide. It also suggested that at various levels, crime, ASB, poor housing conditions, deprivation and migration were having a significant impact in nearly all of the wards. Where national and comparable data was available, it confirmed that levels within Haringey were significant and trends measured over a 3-year period proved that the problems were persistent.

This was helpful in supporting a borough wide additional licensing scheme for HMOs.

However, equally weighting the data and analysing it at a ward level has limitations when establishing whether there is sufficient evidence to support a selective licensing scheme for single family dwellings. The above ward level findings would suggest that 4 wards should make up a selective licensing programme. Yet we know from our analysis and local intelligence that whole wards are not classed as hot spot areas for crime ASB and problems associated with private sector dwellings. Instead, Haringey has pockets of problems across the borough with both good and badly managed single family dwellings existing across the 19 wards.

In addition, the Housing Act requires us to ensure that any selective licensing scheme complements the Council's Housing Strategy and any other initiatives and plans to improve the local area.

For this reason, we decided to further refine our data and apply a weighting (in line with the Council's priorities) and selected a smaller geographical area for analysis, to identify the areas in greatest need.

8.11. Lower Super Output Areas – Stage 2 Analysis.

Our analysis for stage 2 included:

- Establishing an up to date figure for the size of the private sector in Haringey.
- Identifying the location of private sector dwellings and the split between HMOs and single family dwellings.
- Identifying the objectives for a selective licensing scheme and how it dovetails with the Council's other strategies and plans.
- Establishing the areas of need for a selective licensing scheme.

Growth of the private rented sector.

Evidence suggests that the private sector has continued to grow in Haringey since the 2011 Census. In order to establish an up to date figure for the size of the private sector in Haringey, data was extracted from the following source:

- Haringey Council Tax records
- Housing benefit records
- Known licensed houses in multiple occupation (HMO)
- Council properties sold under the right to buy where the leaseholder obtained permission from the council to rent out their home.
- Planning applications involving HMOs
- Complaints made to the Housing Improvement team
- Noise complaints relating to residential properties.

Through this exercise, we identified approximately 35,500 private sector dwellings – a noticeable increase since the 2011 Census of 32,000.

8.12. Location of private sector dwellings and the split between HMO and single family dwellings.

The exact location of private sector properties was established by using a Unique Property Reference Number (UPRN) Where no UPRN was available, we used a predictive model that has been tested extensively by other boroughs. The methodology uses a range of property indicators to assign a probability that a property is private rented or not. For example, claiming housing benefit, occupant turnover, changes of ownership and entitlement to Council Tax Benefit (now called Council Tax Reduction Scheme). The risk factors are considered appropriate as Housing Benefit is associated with renting and low income; occupant turnover and changes of ownership are associated with transient populations and multiple people with different surnames are usually associated with multiple households.

The risk factors for identifying HMOs are as follows:

- No current CTRS (Council Tax Reduction Scheme) recipient at address: A property not receiving CTRS is estimated to be 3.1 times more likely to be HMO status than a property receiving CTRS. A possible explanation for this is that properties receiving CTRS tend to be older person households or owner occupied rather than a landlord.
- Change in Council Tax liable surname between 2013 and 2014: This is proxy for ownership turnover
- Two or more changes in electoral roll registrants between 2012 and 2015: Properties in which the surnames of at least one current registrant at an address were not present at the start of the period
- Three or more adults at an address 2015: This is the most predictive of all the risk factors selected

The risk factors for single family rented properties are as follows:

- No CTRS recipient at address: A single family privately rented household is less likely to receive CTRS but more likely to receive Housing Benefit.
- Change in Council Tax liable surname between 2013 and 2014: This is proxy for ownership turnover
- Two or less adults at address: Two or less adults at an address are predictive of single family status rather than HMO status.
- Housing Benefit recipient at address: Rented single family households can be partly identified by their Housing Benefit status. This is the strongest of the four predictive risk factors

Through this exercise (high risk categories added to the known private rented sector of 6,787) we were able to locate 27,723 private sector dwellings, 11,883 are likely to be HMO and 9,053 are likely to be single dwellings. This is less than the 35,000, the main reason being lack of recent data for the following;

- Two or more changes in electoral roll registrants was only available between 2012 and 2015
- Three or more adults at an address on the electoral roll was only available for 2015
- Change in Council Tax liable surname only available between 2013 and 2014

8.13. Growth of HMOs and the case for additional licensing

The map overleaf details the spread of HMOs across the borough. A red dot indicates that the private sector property is highly likely to be a HMO, a green dot indicates that the property is a licensed HMO and a blue dot indicates that it is a known HMO. Traditionally the distribution of HMOs, particularly smaller HMOs not subject to mandatory licensing have been concentrated in the East of the borough. However, the map shows that there is now a concentration of HMOs in the West of the borough. The West typically has larger houses that lend themselves to conversion to HMO properties. Officers estimate that the number of HMOs in the borough could be as high as 50% of the overall total of private sector dwellings.

Many HMOs operate under the radar and consist of some of the poorest housing conditions in the borough. Traditionally HMOs present a higher level of risk to the occupants, due to the size, layout of the building and more intensive use of electrical and cooking appliances; increasing the risk of fire. Our current licensing scheme has uncovered poorly managed buildings, absent landlords and appalling housing conditions. They are often occupied by some of our most deprived and vulnerable residents. A borough wide additional licensing scheme would increase our powers and go some way to improving the lives of the residents.

All HMO properties by type



8.14. Selective licensing - priority and weighting

The data used to inform ward level analysis was equally weighted – this means that all the accepted criteria for introducing selective licensing received the same priority ranking.

However, our main driver for introducing a selective licensing scheme is to improve housing conditions and the quality of life for residents by tackling ASB and environmental crime associated with poorly managed private sector properties. Furthermore, any scheme should complement the investment the borough is making in regenerating areas, attracting growth and supporting improved living standards for all.

With this in mind we agreed that any licensing scheme should offer the following outcomes, in order of priority:

- Improved housing conditions
- A reduction in significant persistent problems caused by anti-social behaviour, including environmental crimes such as fly tipping.
- Reduced levels of property related crime.

In order to ensure that a selective licensing scheme delivers the desired outcomes we applied the following weighting:

PRIORITY 1		PRIORITY 2		PRIORITY 3	
Indicator	Multiplying factor	Indicator	Multiplying factor	Indicator	Multiplying factor
Housing conditions (cat 1 & 2)	X2	Noise	X1.5	Crime	X1
Complaints about private sector properties.	X2	Fly-tips	X1.5		
Environmental Complaints	X2	ASB	X1.5		
HMO complaints	X2				
Pests	X2				

8.15. Targeting areas of need

In order to achieve the targeting of areas in greatest need, we analysed the data at a Lower Super Output Area (LSOA) level. LSOAs are recognised geographical areas which average approximately 700 households – Haringey has 145 LSOAs. The Office of National Statistics (ONS) collects and analyses economic and demographic data at an LSOA level across the country to compare differences across boroughs and other regions. LSOAs are most noticeably used for conducting the census.

Having identified the 145 LSOAs in Haringey we applied the weighted data. We then identified the priority areas based on:

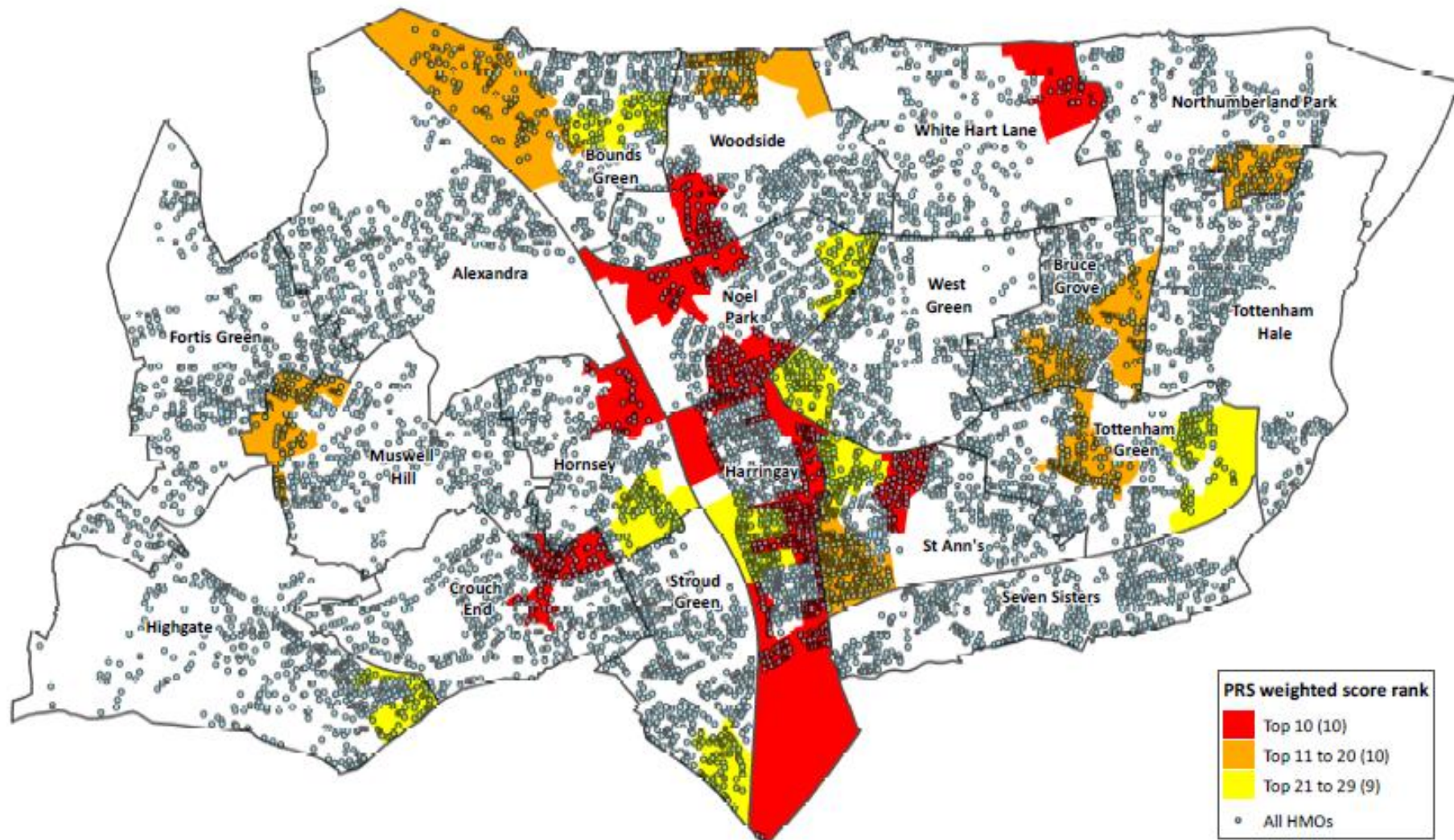
- LSOAs with equal to or higher than the London average for private sector dwellings – this is currently 26%, significantly higher than the national average of 19%.
- LSOAs scoring the highest for poor housing conditions, ASB, crime and environmental crime.

The map overleaf details the results.

At this stage there is no evidence to support a blanket wide selective licensing scheme, but evidence does suggest that there are pockets of problems in need of addressing. The 29 LSOA areas have the highest number of private sector dwellings and are the most problematic areas in terms of: poor housing conditions, problems with ASB, environmental crime and crime reported to the Police.

The pepper-potted coverage of a selective licensing scheme will target single dwelling properties flagged problematic in each ward and complement the borough wide additional scheme.

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



9. Conclusion

Through our evidence building, we believe that we have satisfied the legislative test for introducing a selective licensing scheme to selective areas in the borough and extending our additional licensing scheme borough wide. The key findings of our various data analysis are summarised below:

9.1. Growth in the private rented sector.

- There has been a 45.6% increase in private rental households in Haringey between 2001 and 2011. 33% of households in Haringey are now privately rented. This is 14% more private rental properties than the national average of 19%*.
- We estimate that the number of private sector households stands at 35,500 and up to 50% could be HMOs.

9.2. Poor Housing Conditions

- For the period January 2016 to December 2016, 1,904 housing complaints were received. Of those, 1,150 (59%) related to housing disrepair.
- 1041 category 1 & 2 (high risk) hazards were recorded between January 2016 and December 2016, 69% related to private sector dwellings. The two most common types were excess cold (19%) and damp and mould growth (16%).
- Pest control complaints received during January 2016 and December 2016 confirmed a total of 7,168 recorded incidents relating to private sector dwellings.

9.3. ASB and Noise

- The rate of anti-social behaviour reported to the police in Haringey is above that of the London average, with 34.9 incidents reported annually per 1,000 residents, compared to 33.7 for London.
- Noise complaints received directly by the Council between January 2016 to December 2016. totalled 19,942. From the total we extracted and analysed complaints recorded as: private rented; unknown and blank - the number of complaints totalled 15,923, (80%) of the overall total.

9.4. Environmental Crime

- The number of environmental crime incidents recorded between January 2016 to December 2016 totalled 13,585. 6,641 related to private sector dwellings. 72% of all environmental complaints relate to small domestic rubbish dumping and large domestic rubbish dumping.
- Dealing with fly-tipping costs the tax payers in Haringey £3 million per year.

9.5. Crime

- The overall crime and anti-social behaviour (ASB) rate in Haringey is above that of the national average.
- During 2015-16 the overall recorded crime in Haringey i.e. Total Notifiable Offences (TNO) averaged 101.8 incidents per 1,000 people, compared to 70.0 per 1,000 people nationally.
- During the same period, the domestic burglary rate in Haringey was recorded at 6.8 per 1,000 people, which is double that of the national average.
- Theft offences are high in Haringey - recorded at a rate of 38.7 per 1,000, compared to 30.8 per 1,000 people nationally.