Appendix 3:

Summary of Evidence

Houses in Multiple Occupation identification and location

Overview of data relating to known HMOs

The following analysis is based on available data concerning addresses identified as HMOs in the London Borough of Havering.

HMO locations

The council has obtained information about the location of HMOs in the borough from:

- its Housing Benefit system (where credit is paid to individuals in shared accommodation or HMOs known on the Public HMO Register);

- the Public HMO Register,

- Liberty Housing properties;

- its database of addresses suspected of being HMOs, and

- data from council tax records for shared accommodation and bedsits.

These sources yield the following information:

- the Public HMO Register lists addresses confirmed and registered as HMOs;

- Housing Benefits lists properties in respect of which Housing Benefit is paid and which are identified as HMOs or shared accommodation, but not on the Public HMO Register;

- council tax list properties recorded on the council tax register as being HMOs, bedsits or shared accommodation:

    o HM1 HMOs are bedsits known to be HMOs, but which fall outside the mandatory licensing regime;

    o HM2 HMOs are HMOs, as defined by section 257 of the 2004 Act, which fall outside the mandatory licensing regime; and

    o HM3 HMOs are shared houses, which are known to be HMOs but fall outside the mandatory licensing regime.

- Liberty Housing lists properties, which are HMOs;

- Data on suspected HMO's has been obtained using a Tenure Intelligence System (TIM's) which has predicted HMO's on the basis of combined information held in Data Warehouse.

Some addresses appear on multiple lists. These are **not** 'double-counted' in the table below. Those on official lists (HM1, 2, 3, Liberty Housing and Public HMO Register) have been removed from the Benefits, Council Tax and Suspect, unconfirmed lists. A total of 233 confirmed HMO addresses have been considered as part of this data exercise.

Table 1: Distribution and type/category of HMO by ward

Ward	Benefits	Council Tax	HM1 – Bedsit HMO's	HM2- Section 257	HM3- Shared House HMO	Public Register (Licensed HMO's)	Liberty Housing	Total	Suspected *(updated TIMS data)	Grand Total
Brooklands	4	11	9	2	5	1		32	57	89
Cranham		1			1			2	6	8
Elm Park	1	3	1		2	7		14	23	37
Emerson Park		1			1		1	3	17	20
Gooshays	6	4					1	11	57	68
Hacton	1	1	3					5	13	18
Harold Wood	1	2			3	4	1	11	30	41
Havering Park	2	5	1		2	3	2	15	27	42
Heaton	5	8	2		2	1	4	22	63	85
Hylands			3		1			4	18	22
Mawneys	1	2	4		1			8	20	28
Pettits	1	3	1				1	6	21	27
Rainham & Wennington	3	2	1	1	3	1	3	14	46	60
Romford Town	4	12	20	4	4	10	1	55	80	135
South Hornchurch	6	7	2		1			16	34	50
Squirrels Heath		2	2		1	4		9	22	31
Saint Andrews		1	3				1	5	19	24
Upminster		1						1	7	8
Totals	35	66	52	7	27	31	15	233	560	793

The HMOs identified fall outside of the 2004 Act's mandatory licensing regime. Whilst these properties are spread throughout most wards in the borough, they are concentrated in Romford Town (55) and Brooklands (32) in particular, where the majority are HM1 (Bedsits).

The Harold Hill area (Heaton, Gooshays and Harold Wood wards) contains 19% of HMOs known either to the Public HMO Register, Liberty Housing or Housing Benefit records; and the highest proportion of suspected HMOs currently being investigated by planning are also in Harold Hill.

Harold Hill, which is a key area of concern, has approximately 13,000 properties, with 429 sales being made in the previous 12 months (according to Right Move) and 46 rentals advertised, including house-shares and room renting (according to Right Move).

Whilst the planning investigations into unlawful HMO conversions may be an emerging issue, it should be stressed that the significant majority of properties in Harold Hill are unaffected by these developments.

The map below shows the distribution of the aforementioned categories of HMO, with clear clusters of properties notable in Brooklands, Romford Town and Heaton wards. Please refer to the table above for number breakdown. There are also high concentrations of HMOs are located in the areas of Central Romford and Harold Hill.

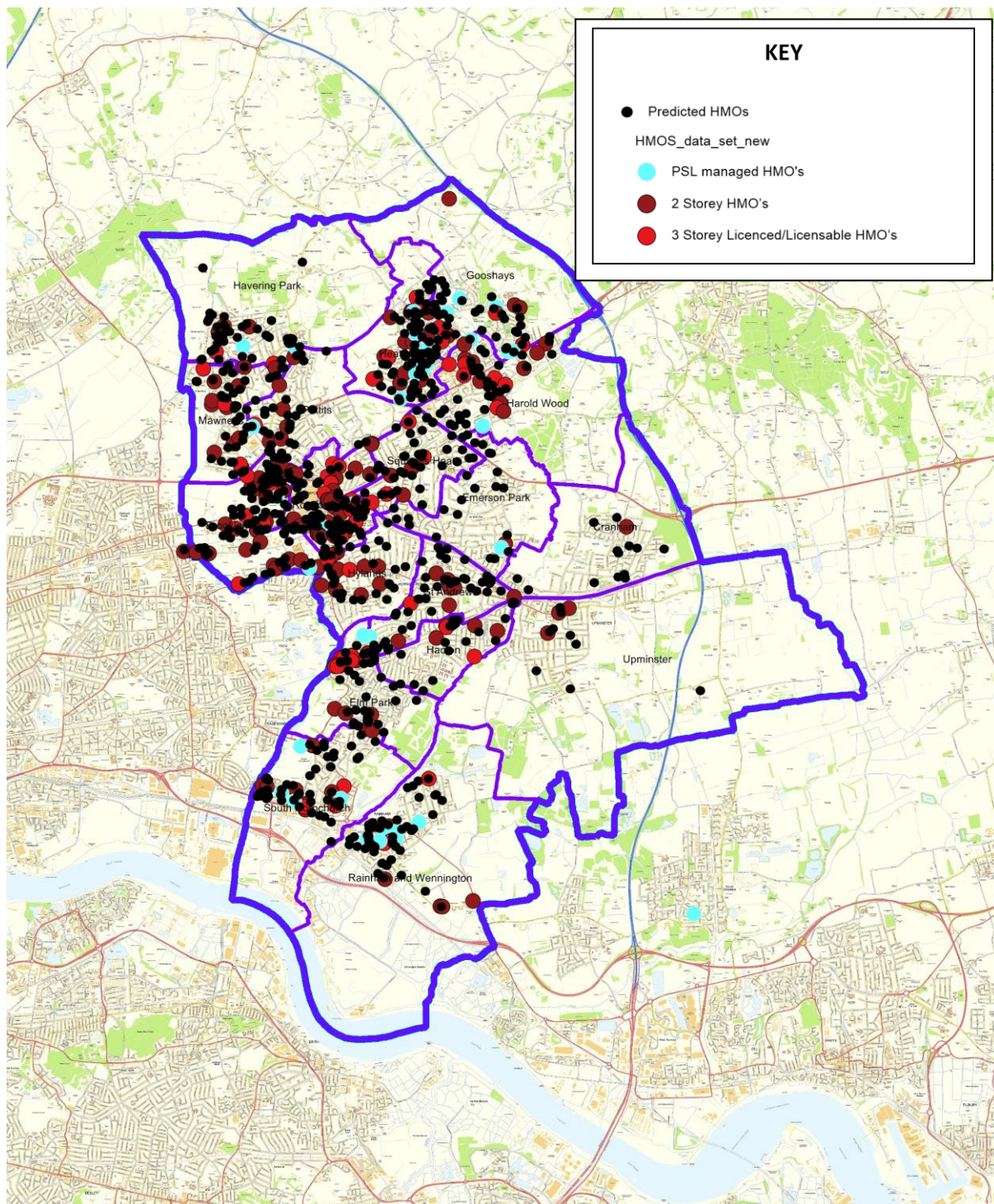# Figure 1: Approximate locations of all HMO's in Havering

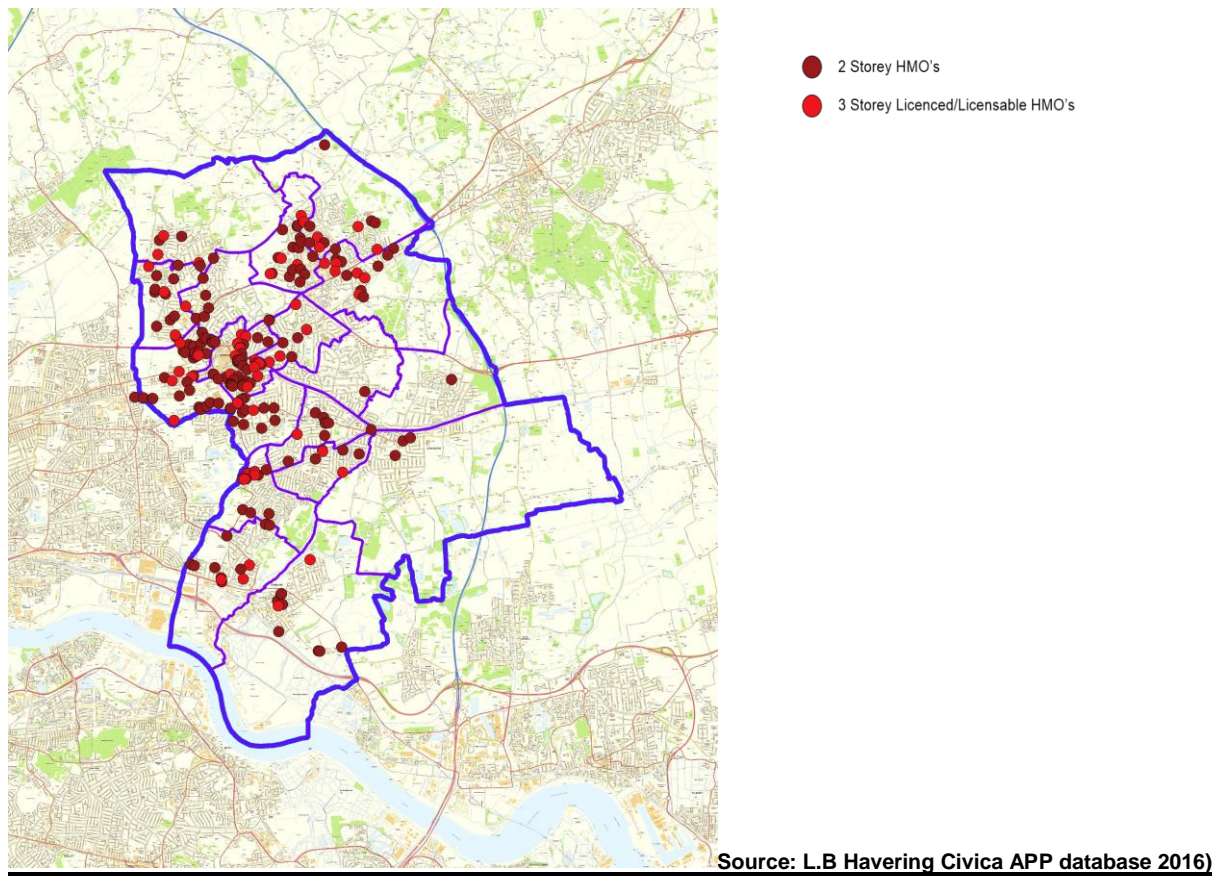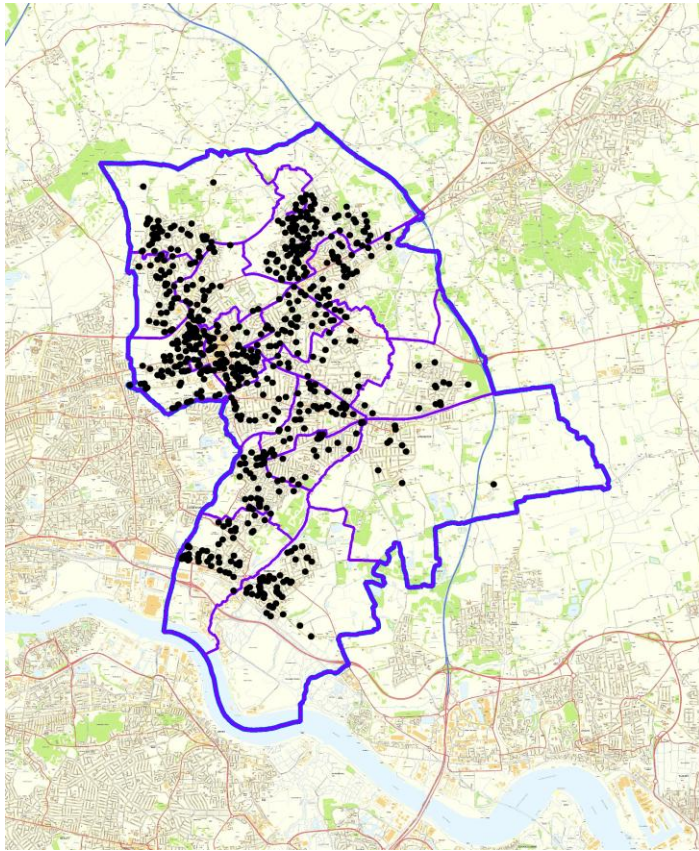**Figure 2: Approximate locations of Known HMO's in Havering**

Legend:
- 2 Storey HMO's
- 3 Storey Licenced/Licensable HMO's

Source: L.B Havering Civica APP database 2016)

Figure 3: Approximate locations of unconfirmed (predicted) HMO's in Havering

Source: Tenure Intelligence Model Nov 2016

Supporting data relating to incidents of crime and ASB

Crime and ASB at HMOs

The council has cross-referenced the HMO addresses it has identified with data about noise nuisance (collated by the council), 999 calls to the police and reported and recorded crimes (from the Metropolitan Police).

Due to the different methods of recording address data, the council has retrieved this information manually by searching for each address in each database. The data retrieved covers the 2014-15 financial year (April 2014 to March 2015).

Table 2 overleaf shows the total number of records for noise complaints, police calls for service and police calls for domestic violence, as well as the total crime and crime-related incident records, for which the venue was a HMO.

While the total number of known HMOs accounts for less than 0.3% of all properties in the borough (233 of approximately 100,000), it should be noted that this figure is likely to be vastly underestimated due to the number of unconfirmed but predicted HMOs that exist. However, on the basis of the lower figure, HMOs remained proportionately over-represented in all cross-referenced areas, especially domestic violence and noise complaints. It should be noted that this analysis is based only on what is known to the recording agencies. The council acknowledges that incidents of crime, noise and anti-social behaviour can go unreported.

A small number of addresses were identified as being significant contributors to police calls for service, with two HMO addresses generating more than 10 calls each. This may be indicative of a larger problem associated with occupants who reside in this type of short term accommodation and further supports the council's desire to ensure that all its HMOs are covered by the licensing proposal.

Table 2: Noise complaints, police calls for service, police calls for domestic violence and total crime and crime-related incident records for 2014-15 for HMOs.

Category	No. premises	Noise complaints	Police calls (exc. Domestic Violence)	Police calls - domestic violence	Crimes recorded
HMO Public Register	31	2	11	10	13
Benefits list	35	-	17	25	14
Council Tax	66	-	14	5	9
HM1 HMO Bedsits	52	-	22	23	21
HM2 HMO Section 257	7	-	1	7	10
HM3 HMO Shared House	27	1	2	4	23
Liberty Housing	15		5	2	9
Total known HMOs	233	3	72	76	102

Source: CRIS

Table 3: Number of properties affected for 2014-15 (%)

Category	No. premises	Noise complaints *No. of properties affected (%)*	Police calls (exc. domestic violence) *No. of properties affected (%)*	Police domestic violence calls *No. of properties affected (%)*	Crimes Recorded *No. of properties affected (%)*
HMO Public Register	31	2 (6%)	4 (13%)	6 (19%)	9 (29%)
Benefits list	35	-	4 (11%)	6 (17%)	8 (23%)
Council Tax	66	-	9 (14%)	5 (8%)	8 (12%)
HM1 HMO Bedsits	52	-	8 (15%)	9 (17%)	9 (17%)
HM2 HMO Section 257	7	-	1 (14%)	1 (14%)	3 (43%)
HM3 HMO Shared House	27	1 (4%)	2 (7%)	3 (11%)	11 (41%)
Liberty Housing	15		3 (20%)	2 (13%)	7 (47%)
Total	233	3 (1.3%)	31 (13%)	32 (13%)	55 (24%)

Source: CRIS

Data held on CRIS is taken directly from reports entered by Police Officers, and its primary function is to record steps taken in ongoing police investigations. The data used here has been taken directly from the CRIS system, and has not been subjected to quality-assurance procedures which are carried out on crime figures which are released as official information.

Of the data taken from CRIS, there were around 20,000 crimes reported in Havering in each year. The lists of HMOs have been compared against the 'venues' recorded for every crime report recorded in each year; so this report deals with incidents which occurred within an address, rather than incidents report by residents of that particular address. For example, a crime report where a resident of an HMO reports a break-in to their car while parked in their office car park would not be counted by this report, however a report of a break in to that same person's room at the HMO would be included, as the HMO is the venue which the crime occurred at.

There are some instances when mistakes such as incorrect placement of spaces, or addresses with multiple sections, could throw the search method used. When considering 20,000 crime reports each year, it was not practical to check each piece of information for accuracy; however these inaccuracies would, if anything, mean that the number of offences in HMOs were higher than discussed in this report, as certain addresses may not have been included in automated counting and comparison processes. The reasons mentioned above again means that the data is not reliable, and should be taken as an indication of levels rather than undisputable fact.

Table 4 displays the number of HMOs in each class which were recorded as the venue of a crime, and of these, how many crimes were recorded from these addresses.

Table 4. Number of HMOs in each class recording crimes, and the total number of crimes these are responsible for							
Year		2014		2015		2016	
Category	Total no. of HMOs In category	No. HMOs at which crimes were recorded	Total no. crimes recorded at these HMOs	No. HMOS at which crimes were recorded	Total no. crimes recorded at these HMOs	No. HMOs at which crimes were recorded	Total no. crimes recorded at these HMOs
Suspected HMOs	560	136	262	126	222	114	208
HMO 2 Storey	202	36	72	28	60	38	84
HMO 3 Storey	31	8	12	15	36	12	30

In 2014, 17.% of the 2-storey HMOs were the venue of a crime. This figure was 25% for the 3-storey HMOs, and 24% for the suspected HMOs.

In 2015, 13.% of the 2-storey HMOs were the venue of at least one crime; 48% of the 3-storey HMOs, and 22.0% of the suspected HMOs.

In 2016, 19% of the 2-storey HMOs saw at least one crime; 38% of the 3-storey HMOs, and 20% of the suspected HMOs saw at least one crime.

Table 5 breaks down the figures in table 4, to show the varying levels of demand generated by HMOs in each class; for example the majority of suspected HMOs in 2014 (650 of 786) were not recorded as the venue of any crimes. Eighty three of the suspected HMOs were recorded as the venue of one crime, twenty-eight recorded as the venue of two crimes, ten as the venue of three crimes, and so on.

No. of crimes reported at each HMO	Suspected HMOs 2014	Suspected HMOs 2015	Suspected HMOs 2016	2 Storey HMOs 2014	2 Storey HMOs 2015	2 Storey HMOs 2016	3 Storey HMOs 2014	3 Storey HMOs 2015	3 Storey HMOs 2016
1	83	77	79	17	17	24	5	7	8
2	28	24	18	9	3	4	2	4	2
3	10	15	5	5	3	4	1	1	
4	6	4	4	4	3	2		1	
5	2	3	2			2			1
6	2	2	2	1	1			1	
7	2	-		1					
8		-	1			1		1	
9		1	1						
10	1				1				
11	1								
12	1								
13									1
15						1			
16			1						

Table 5. Levels of crime reported by HMOs, by year

A further analysis of the number of properties affected reveals that almost a quarter of HMOs were linked to reported incidents of crimes; and that rates of burglary per 100 households were one and a half times higher at HMOs than the borough average.

Of all HMOs identified, 15% had made calls to the police about domestic incidents or domestic abuse. There was a higher incidence of such calls from properties whose residents were in receipt of housing benefit (38% of these properties reported domestic abuse to the police) and where the HMO was either on the Public HMO Register (19%) or classed as a bedsit (17%).

Of all crimes and crime-related incidents recorded at HMOs, 45% related to domestic disputes or domestic abuse (46 of 102 offences reported and recorded). This correlates with domestic violence calls.

Other types of crime were generally reported at a lower than average rate for Havering.

The data for two addresses was omitted from the above tables, due to an excessively high numbers of calls for the properties concerned.

Approximately 85% of those residing in HMOs were British born. HMO residents were also more likely to be male, predominantly under 30 (where data was available), with just 33% of occupiers being female.

The list of names was cross-referenced with crime records, on which a named suspect had been identified. 27 HMO occupants had been suspected of at least one crime in the previous 12-months, in which time, cumulatively, they had been suspected of 45 offences. The largest proportion of these offences was for violence or domestic violence (17 persons), followed by theft and serious acquisitive crimes (4 persons), drugs offences (4 persons) and criminal damage (3 persons).

HMO occupants suspected of crimes were not concentrated in any single area of Havering. A breakdown by area revealed that Romford (RM1, RM7) and Rainham (RM13) had the highest number of suspects, with 8 people each. They were followed by Hornchurch (RM11, RM12) with 5, Harold Hill (RM3) with 4, and Collier Row (RM5) with 2.

Whilst these numbers are relatively low, it is notable that, in the 12 month period considered, an HMO occupant was seven times more likely to be accused of a crime than a non-HMO occupant. The 27 HMO occupants suspected of offences reported to police in that 12 month period represented 16.8% of all HMO occupants. Borough-wide, the average is 2.4%.

This demonstrates that a disproportionately higher concentration of those with an offending history are found in HMO accommodation.

This may be explained by the fact that access to other housing is more limited for offenders; and because of affordability. The trend is troubling nonetheless; and six addresses identified by the council accommodated more than one person with previous criminal involvement.

HMO correlation with burglary hotspots

There is a strong correlation between the location of HMOs in the borough and areas where the incidence of burglary is disproportionately high.

40% of all reported household burglary in the 12-months period to September 2016 took place in 25 areas in the borough. These areas make up just 7% of the borough's geographical area and contain 20% of the borough's housing stock. Within these locations are 74% of our known HMOs (198 dwellings). Intelligence reports have identified two HMOs used by persons identified as prolific burglars.

It is noteworthy that, according to numerous burglary studies[1] rates of burglary are higher in areas of private renting and areas with multiple HMOs. This is because the transient nature of the population in these locations, with many residents staying for a short term only, enables offenders to operate with greater anonymity than they might in more established communities.

Significant concentrations of HMOs in small geographical areas may, therefore, lead to elevated levels of crimes such as household burglary and vehicle crime. Total notifiable offences reported to and recorded by the Metropolitan Police within Havering have increased by 4.7% over the past five years, whilst over the 12 month period to September 2016 there had been a rise of 10.2%. Latest crime data from the Metropolitan Police is not yet available beyond July 2017 so the last full 12 month period cannot be reported on at this time.

Incidents of anti-social behaviour

The largest volume of ASB incidents, from available data, in Havering are reported to the Metropolitan Police (92%), not including Environmental Crime and ASB reported to the London Borough of Havering. When these are factored in (flytipping, graffiti, noise, abandoned vehicles) then the Metropolitan Police reports account for 42% of the total and local authority environmental crime and ASB accounts for 58%.

Figure 4 below provides a breakdown of all police ASB calls made in Havering and how they were categorised in the 12-month rolling period to September 2016. Most incidents are recorded as '*Rowdy and Inconsiderate Behaviour*' (26%), an ambiguous category covering a range of behaviours, predominantly groups causing noise and making complainants feel intimidated. '*ASB – Nuisance*' follows with 18%, rising 188% since the previous assessment, or over 550 additional records. This type category has been used predominantly in capturing calls regarding unauthorised traveller sites at a number of open spaces across the borough. Neighbour disputes, harassment and noise, invariably interlinked, and substance misuse related ASB feature highly.

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(1) [1] Higgins, A. and Jarman, R. (2015) Safe as Houses? Crime and changing tenure patterns, The Police Foundation. Jacobson, J. (2003) The Reducing Burglary Initiative: planning for partnership, Home Office, London. Bottoms and Wiles 1988 – This refers to "Crime and Housing Policy: A Framework for Crime Prevention Analysis". Enson and Stone 1999 – This refers to "Campus crime: A victimisation study", Journal of Criminal Justice. Bernasco and Luykx 2003 – This refers to "How do residential burglars select targets". Tilley et al 2004 - This refers to the "Handbook of Crime Prevention and Community Safety", an edited book
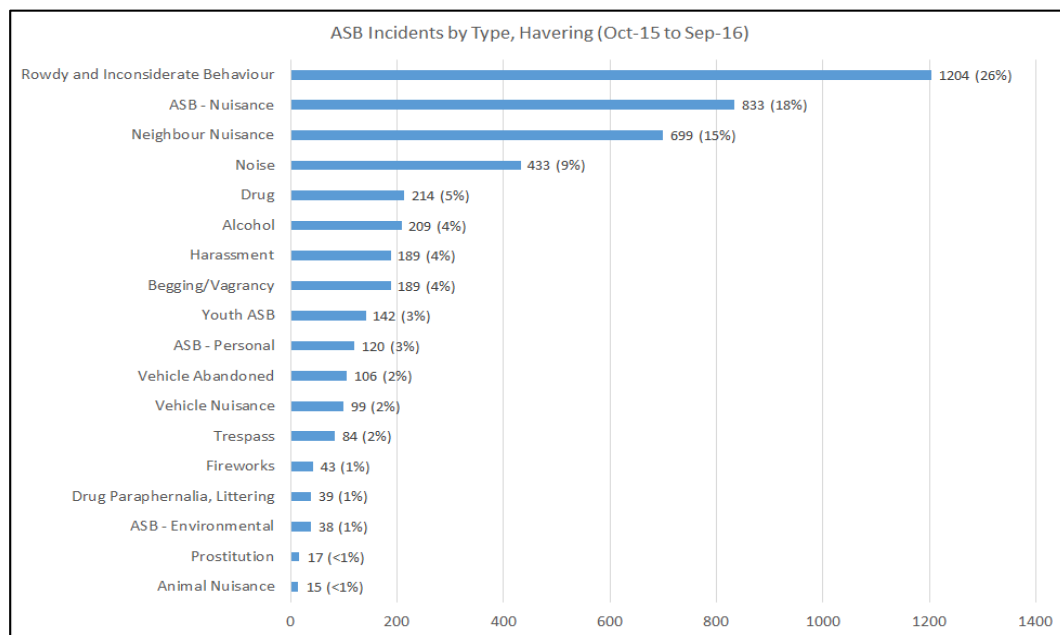
Figure 4 Breakdown of ASB calls by incident type

This section identifies those areas of Havering where crime, disorder, ASB and substance misuse are most problematic. The maps below show hotspots for total recorded crime, household crime, all motor vehicle crime and personal crime (violence, sexual and robbery offences) in Havering. There were 17,456 offences recorded in the 12-months to September 2016, the highest concentrations were located in areas of the highest pedestrian and vehicular traffic, such as transport hubs and business districts (map 1). Around a third of all crime in Havering occurs in business districts, transport hubs, shopping and retail areas.

There were almost 4,750 household crimes in Havering (burglary, criminal damage and vehicle crimes at home addresses). Hotspots were more widespread across the borough, with highly concentrated pockets of offending in Heaton and Gooshays to the north, Elm Park, South Hornchurch and Rainham & Wennington to the south, and Brooklands ward in the centre of the borough – see map 2.

There were over 6,600 personal crimes (robbery, violence and sexual offences). These were highly concentrated within town centre and retail areas. The most concentrated hotspots are Romford Town Centre, which accounts for more than half of robbery and sexual offences in Havering, Hornchurch Town Centre and Harold Hill – see map 3
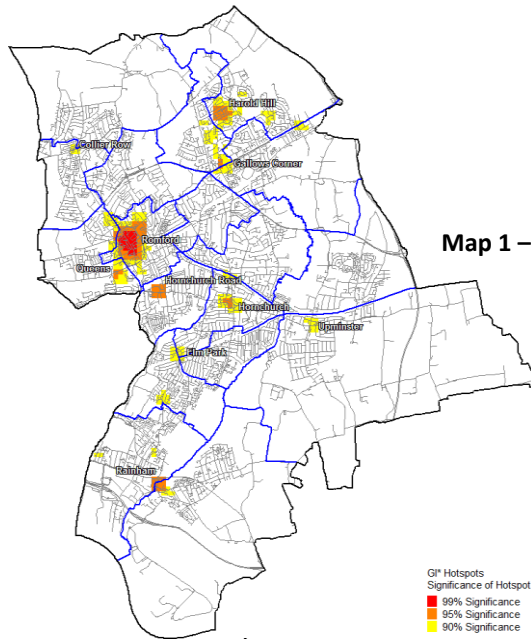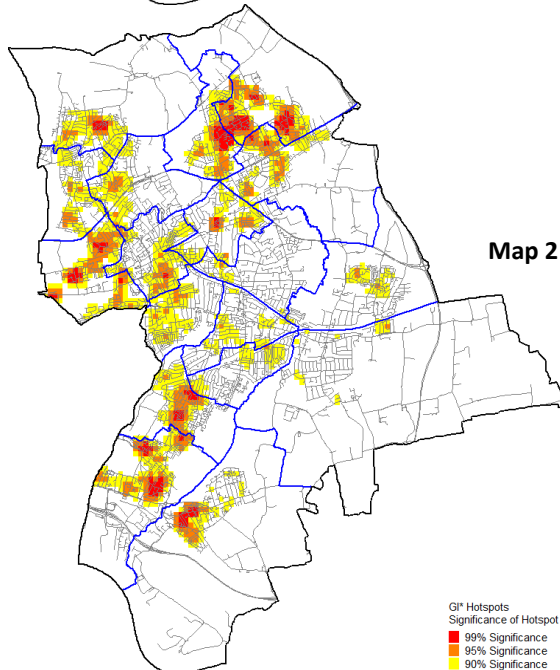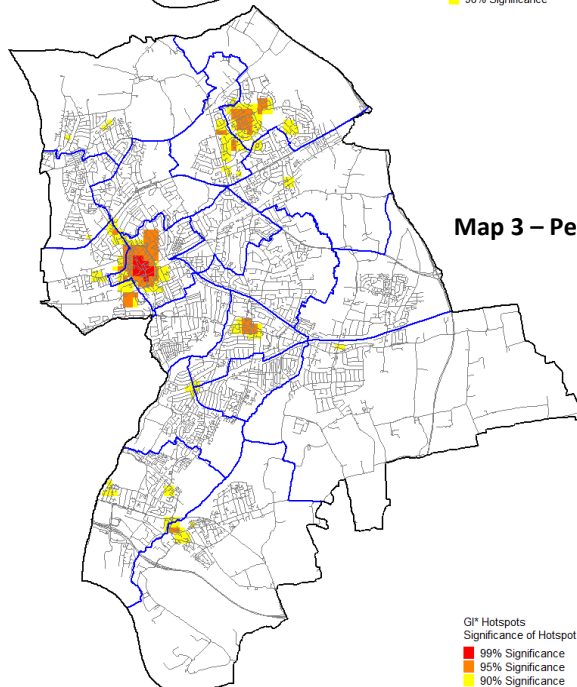
Maps 1-3:

Map 1 – Total Notifiable Offences;

GI* Hotspots
Significance of Hotspot
- 99% Significance
- 95% Significance
- 90% Significance

Map 2 – Household Crime

GI* Hotspots
Significance of Hotspot
- 99% Significance
- 95% Significance
- 90% Significance

Map 3 – Personal/Violent Crime

GI* Hotspots
Significance of Hotspot
- 99% Significance
- 95% Significance
- 90% Significance

Table 6 as an overview shows the top 10 volume wards for a selection of crime types in Havering. Romford Town ward is the largest contributor to total notifiable crime in Havering, with 3,517 offences in the previous 12-months (20% of all crime in Havering). It is also worth noting that Romford Town ward has the 22nd (down from 15th) highest crime rate of all wards London wide, ranking as high as 9th for violence with injury and within the top 20 for business crime. Gooshays and Brooklands wards rank within the worst 20% of London wards by rate of crime for a number of offence categories - Violence, Vehicle Crime, Burglary and Criminal Damage. Burglary, Vehicle Crime and Criminal Damage are the only offence categories in Havering where three or more wards rank within the worst 20% of all London wards (Brooklands, Gooshays, Heaton, Harold Wood, Rainham & Wennington, Romford Town and South Hornchurch make up these wards which feature in the worst 20% for at least one of the aforementioned categories of crime). In contrast, there are eight wards which are within the safest (lowest rates of crime) 20% in London, which are Cranham, Elm Park, Emerson Park, Hacton, Havering Park, Pettits, Squirrel's Heath and Upminster.

Table 6: Top 10 Wards, by volume, for selected areas of crime in Havering, 12-months to Sep-16 (Metropolitan Police ward data)									
Violent Crime		Burglary		Motor Vehicle Crime		Other Theft & Handling		Total Notifiable	
Romford Town	1,185	Gooshays	173	Brooklands	183	Romford Town	1,346	Romford Town	3,517
Gooshays	608	South Hornchurch	144	Rainham & Wennington	181	St. Andrews	255	Gooshays	1,500
Brooklands	542	Brooklands	137	Harold Wood	158	Hylands	253	Brooklands	1,393
Heaton	400	Squirrel's Heath	131	South Hornchurch	155	Gooshays	246	South Hornchurch	1,074
South Hornchurch	368	Romford Town	126	Gooshays	154	Upminster	203	Heaton	978
St. Andrews	339	Pettits	119	Romford Town	143	Brooklands	199	Harold Wood	942
Harold Wood	296	Cranham	106	Mawneys	122	Mawneys	194	Rainham & Wennington	928
Rainham & Wennington	268	Harold Wood	106	Heaton	117	Rainham & Wennington	193	St. Andrews	926
Havering Park	271	Hylands	99	Havering Park	105	Harold Wood	172	Hylands	812
Hylands	220	Upminster	95	Hylands	99	Pettits	140	Mawneys	743

Source: Havering Community Safety Partnership Strategic Assessment 2016

Evidence of problematic and poorly-managed HMOs

Over approximately the last five years the council has operated a proactive inspection programme for non-licensable HMOs, most of which are 2-storey buildings. The programme's objectives included:

- providing the council with knowledge about the quality of accommodation afforded by smaller HMOs;
- helping landlords to improve HMOs, their management and fire safety; and
- encouraging compliance with the HMO Management Regulations.

The programme revealed unsatisfactory management practices in a significant number of cases. It identified that the majority of non-licensable HMOs contravened one or more of the HMO Management Regulations' requirements, did not meet fire safety standards set out in LACORS guidance or did not satisfy minimum space or facility standards adopted by east London authorities. The ward locations of those premises are shown in figure 5 and the overall level of compliance detected is illustrated in figure 6 below.

Figure 5: Number of HMOs included in sample, by ward

Brooklands	17	**Gooshays**	9	**Hylands**	3	**Romford Town**	12
Cranham	1	**Havering Park**	3	**Mawneys**	4	**South Hornchurch**	8
Elm Park	3	**Heaton**	16	**Pettits**	3	**Squirrels Heath**	2
Emerson Park	3	**Harold Wood**	8	**Rainham & Wennington**	6	**Upminster**	3
Saint Andrews	0	**Hacton**	0				

Figure 6: Results of proactive risk assessment inspections of two storey HMOs in Havering 2013 - 2016
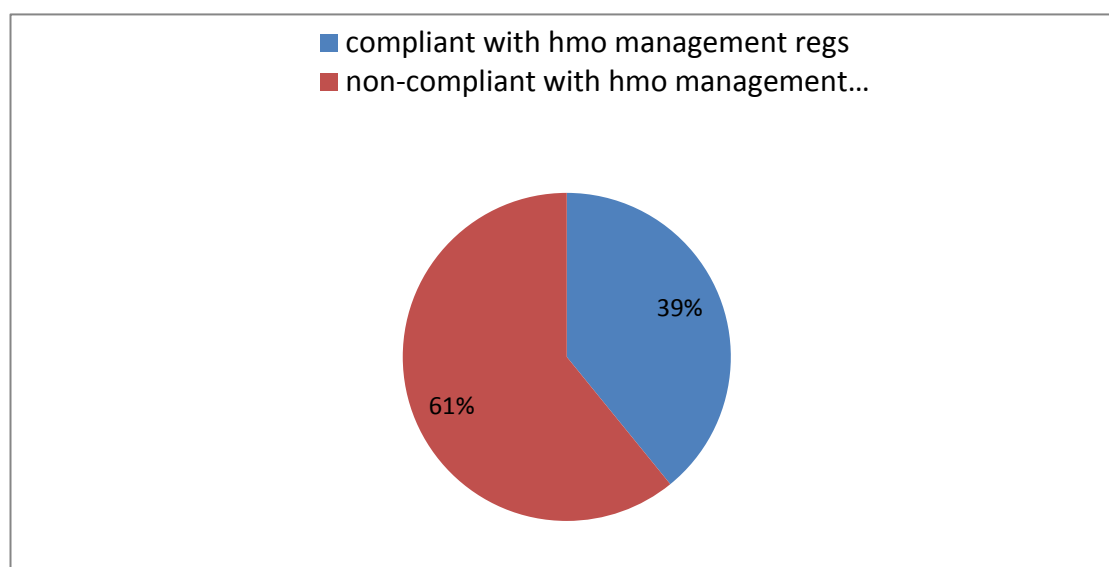
During these inspections a number of specific issues were assessed, including:

- fire safety (fire alarms, means of escape, protection of escape routes);
- number and adequacy of standard amenities (W/C, basin, bath/shower kitchen sink and cooking facilities);
- gas and electrical safety;
- disrepair; and
- management controls.

Table 7 illustrates the nature of deficiencies, identified by type and ward location, from an inspection sample of 78 non-licensable HMOs. A significant number of individual premises were deficient in multiple categories.

Table 7: summary of results

Ward	No. fully compliant	No gas safety certificate	Poor fire safety	Disrepair	Inadequate amenities	Poor management
Brooklands	4	3	5	2	1	3
Cranham	1	0	0	0	0	0
Elm Park	3	0	1	0	0	0
Emerson Park	1	0	0	0	0	0
Gooshays	3	3	3	3	1	0
Harold Wood	1	3	3	2	1	1
Havering Park	1	1	2	0	0	1
Heaton	5	1	8	5	0	7
Hylands	2	1	1	0	0	0
Mawneys	2	0	1	0	0	2
Pettits	0	1	1	0	1	0
Rainham & Wennington	1	3	4	1	0	2
Romford Town	3	4	5	0	3	3
Saint Andrews	0	0	0	0	0	0
South Hornchurch	1	2	3	1	1	3
Squirrels Heath	1	0	0	0	0	0
Upminster	0	2	3	1	1	1
% of sample total	**37**	**30**	**51**	**19**	**11**	**29**

Figure 7 below illustrates the year-on-year rise in HMO linked complaints received by the council's Environmental Health Department. The number has increased three-fold in the five year period 2012-2017.

Figure 7 - Total number of complaints linked to HMOs received by Environmental Health Department by year
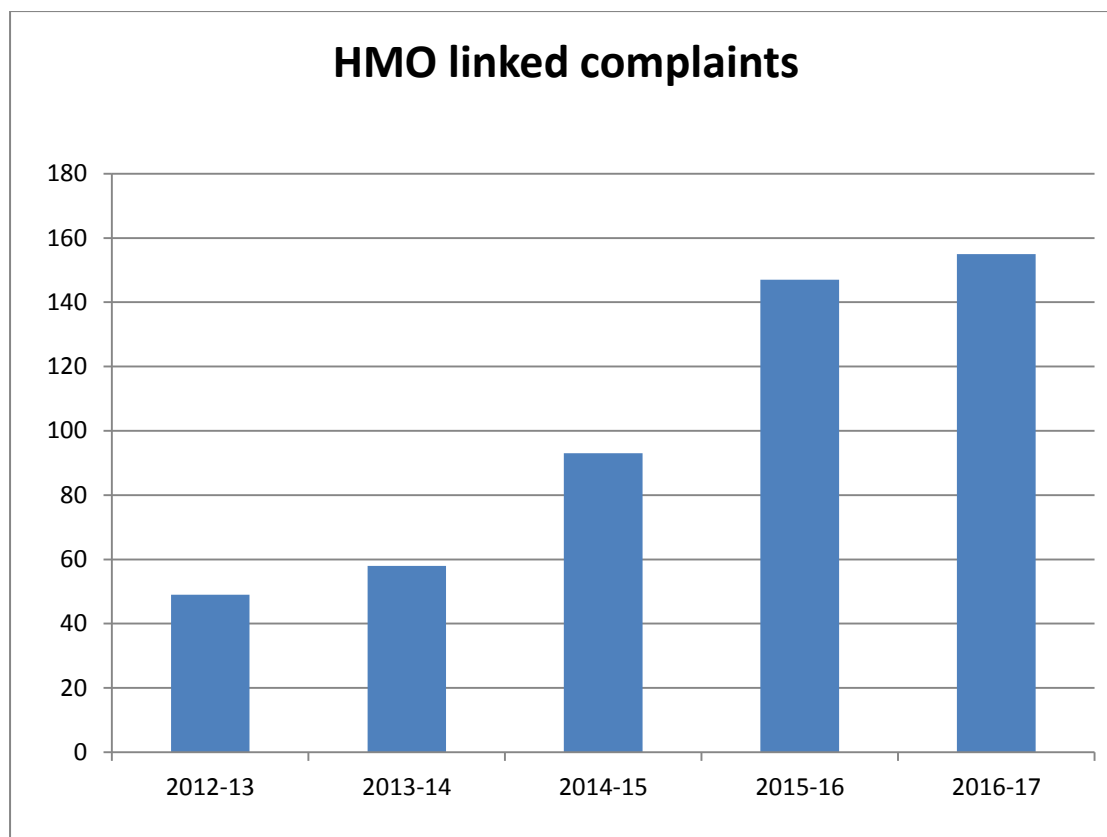
Source: LBH Civica APP database 2016

A further analysis of this increase in the number of complaints has been broken down into ward areas. The results are shown in figure 8.

Almost all wards of the borough have seen an increase in the overall number of HMO linked complaints received per year between 2012 and 2017. The wards with the most significant increase in the number of complaints are Brooklands, Gooshays, Harold Wood, Heaton, Romford Town and Squirrels Heath. Only Upminster and Pettits wards have seen a reduction in the number of reports from 2012 to 2017, albeit several other wards have insignificant numbers of reported complaints overall.

Figure 8 – complaints received within Environmental Health linked to non-licensed HMOs by year and ward area (Source: LBH Civica APP database 2016)
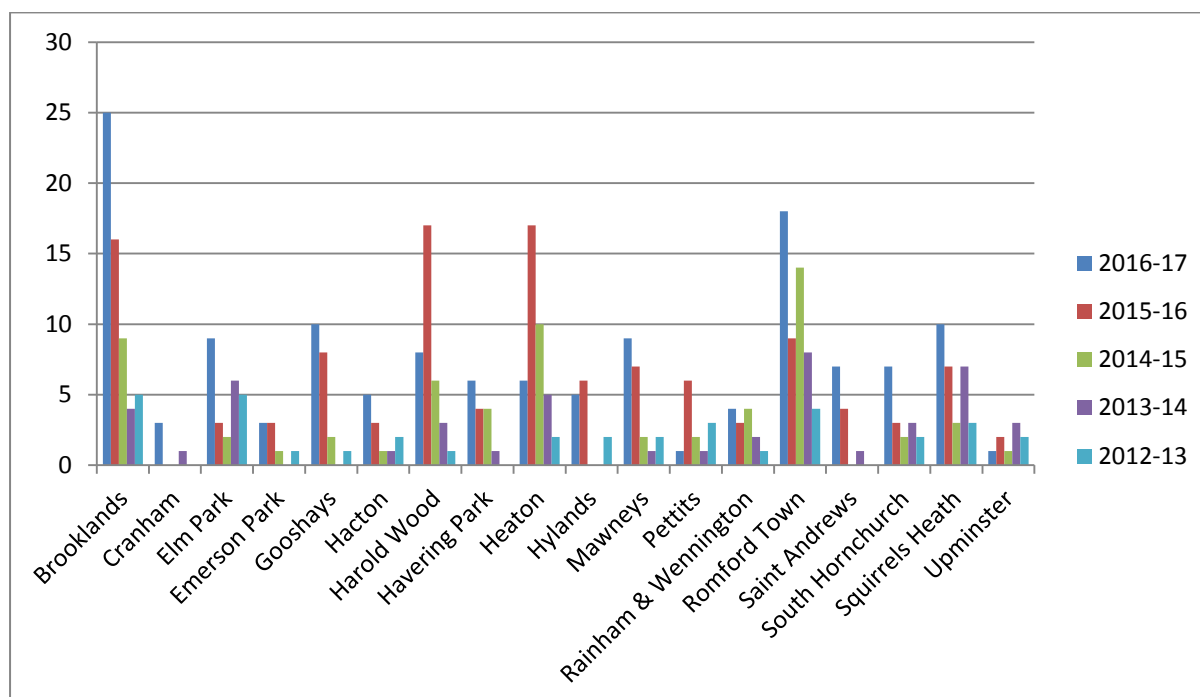

Figure 9 below shows the level of occupancy in known two-storey (non-licensable) HMOs from sample inspections of 78 premises. On the basis of this sample, 33% of HMOs in Havering are likely to remain outside the scope of licensing if the Government's proposal to extend mandatory HMO licensing is implemented. Although not all of the occupancy levels of known HMOs have been recorded, it is quite likely that a similar proportion of predicted (unknown) HMOs will be occupied by less than five persons and therefore fall outside current and proposed mandatory licensing requirements. This could amount to around 400 premises borough wide based on known and predicted HMO data.

Figure 9- Level of occupancy in HMOs
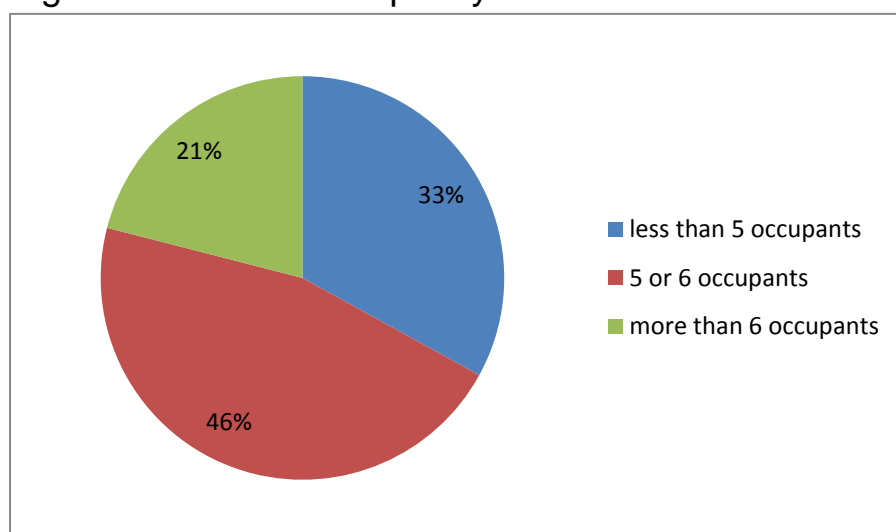
The ward locations of known HMOs that would fall outside the extended mandatory HMO licensing requirement are illustrated in figure 10.

Figure 10- Location of sample HMOs falling outside mandatory licencing