



Havering Council

**Property Licensing Schemes
Implementation Evidence Report**

October 2025

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Executive Summary

This report presents a comprehensive analysis and evidence to support Havering Council's proposal to introduce a selective licensing scheme for all privately rented homes (excluding HMOs) within 7 out of 20 wards to address the prevalence of poor housing conditions, and a borough-wide additional HMO licensing scheme.

The proposed schemes are a proactive measure designed to raise housing standards within the private rented sector, ensure tenant safety, and foster safer, more cohesive communities. Landlords in the designated areas will be required to obtain a licence, meeting specific conditions that guarantee the quality and safety of rental properties. By instituting clear accountability, the schemes are expected to drive improvements in property maintenance, reduce anti-social behaviour, and safeguard vulnerable tenants from exploitation and unsafe living conditions.

Aligned with Havering Council's broader strategic objectives and consistent with national and local housing policies, the proposed property licensing schemes aim to raise housing standards, protect vulnerable residents, and foster safer, well-managed communities. The introduction of the schemes will directly support key priorities around wellbeing, placemaking, and environmental sustainability.

This report outlines the rationale behind the proposals, including the evidence of current challenges in the private rented sector and the legislative framework underpinning the schemes. It also highlights the expected outcomes and benefits, including enhanced housing standards, improved tenant welfare, and the promotion of community regeneration. The selective and additional licensing schemes represent a targeted, strategic response towards addressing the challenges faced by both tenants and landlords in the most affected areas of Havering, and is a vital step towards delivering the council's long-term vision of creating "The Havering you want to be part of" .

1. Introduction

The London Borough of Havering is an outer London borough located on the northeastern boundary of Greater London. It covers an area of 112.3km² and borders Essex to the north and east, the unitary authority of Thurrock to the southeast and the London Boroughs of Redbridge and Dagenham & Barking to the west and Bexley to the southwest across the river Thames.

Havering is a largely suburban area and one of the greenest of London boroughs as well as being the third largest.

Between the last two censuses (held in 2011 and 2021), the population of Havering increased by 10.4%, from around 237,232 in 2011 to around 262,000¹ in 2021.

GLA projections suggest that Havering’s population is set to slowly grow from the 2021 census figure – by 2031 it is expected to reach 277,880 continuing that growth trend with 279,865 forecast by 2041².

Consistent with the long term and nationwide trend, the private rented sector (PRS) in Havering has grown steadily from 11% in 2011 to 19% in 2024 (Figure 1).

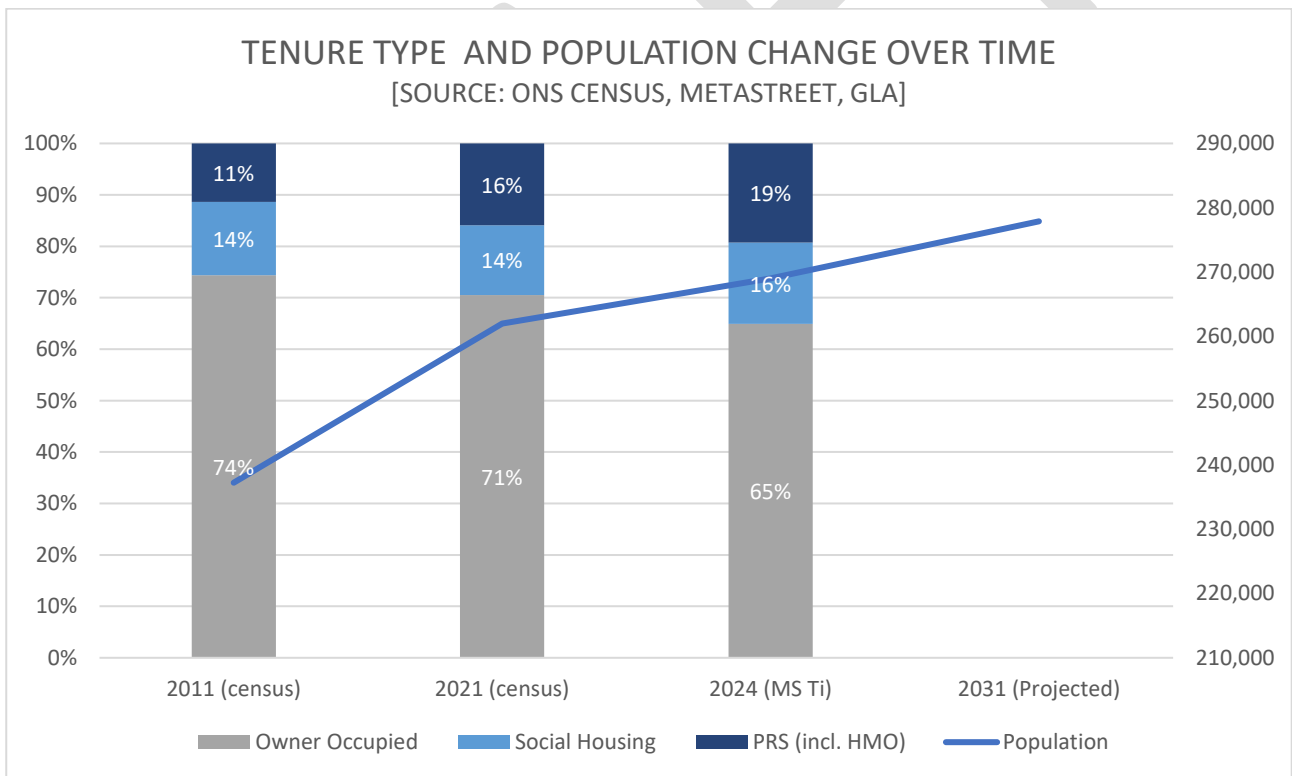


Figure 1: The change in housing stock in Havering from 2011 to 2024

Tenure modelling carried out in October 2024 predicts Havering’s PRS to have increased as a proportion of all housing stock at 19% from the previous census in 2021 (Figure 1). The percentage of PRS properties in each ward ranges between a maximum of 44.6% (St. Albans) and a minimum of 9.1% (Cranham) (Figure 2). Therefore, 7 out of 20 wards in the borough have a

¹ [Havering population change, Census 2021 – ONS](#)

² [GLA Population Projections \(london.gov.uk\)](#)

higher percentage PRS than the national average in 2024 (19%). The average rate of PRS across all wards is 19.3%.

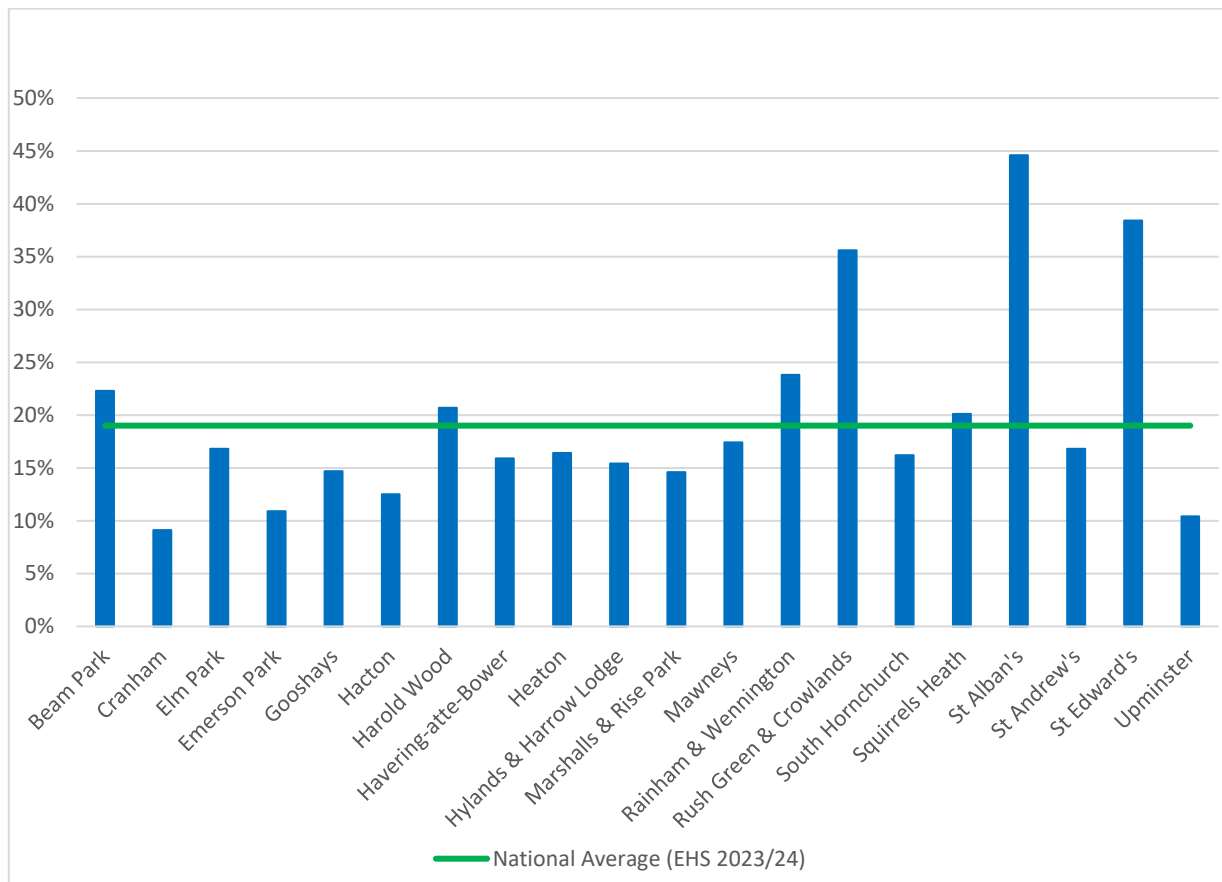


Figure 2: Percentage of PRS in all wards [Source: Metastreet 2024]

The growth of the private rented sector has gone hand in hand with huge increases in rent across London over the last 20 years. This has resulted in residents not being able to afford and access decent, affordable housing. Havering has above average rents nationally with 33.2% of median earnings used to pay rent. This is lower than the London average of 46.4% but higher than the average for England of 24.9%.

Havering Council is on a journey dedicated to tackling some of the most serious issues facing its vulnerable residents in the PRS. In addition to the national mandatory HMO licensing scheme, in 2018, Havering implemented an additional HMO licensing scheme covering 12 wards (Scheme 1) which ran from 2018 to 2023 and a further additional licensing scheme (Scheme 2) running from 2021 to 2026 covering the remaining 6 wards, to ensure safety standards for tenants living in small houses in multiple occupation (HMOs).

Havering also have a current Selective Licence scheme for Brooklands and Romford Town (2021 – 2026). As a result of the ward changes in May 2022 these are now 3 wards: Rush Green and Crowlands, St Alban's & St Edward's (2021-2026). The Council's licensing schemes have made some progress in improving property standards for residents living in the PRS and demonstrate the Council's commitment to robust enforcement of standards. The pilot selective licensing scheme and the previous additional HMO scheme have demonstrated the importance of these schemes but also shone a light into how much work is still to be done.

2. Proposals for a selective licensing scheme

A proposed selective licensing scheme is the next phase of a strategic plan to make targeted improvements to the PRS where poor property conditions remain prevalent. As such, the Council is using the legislative tools available to ensure that those living in the PRS are not left behind with its plan to improve all housing in the borough. To achieve this, the Council is adopting a strategic approach to private sector licensing across the borough and is proposing to introduce a selective licensing scheme consisting of a single designation, covering 7 of the 20 wards in the borough, and a borough-wide additional licensing scheme.

The proposed seven wards in the selective licensing designation are:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Alban's
- St Edward's

These wards are experiencing high levels of poor housing conditions.

3. Proposed selective licensing scheme designation area

3.1 Metastreet and ONS Census 2021 data

To understand the current state of Havering's housing stock, Metastreet Ltd. were commissioned to undertake an independent detailed review across the borough and assess housing stressors relating to key tenures, particularly the PRS. A stock-modelling approach based on metadata and machine learning was used to provide predictive insights about the:

- Current levels of PRS properties in Havering and tenure change over time
- Levels of serious housing hazards in the PRS (Category 1 / high Category 2 hazards)
- Other housing related stressors including service demand, population and deprivation linked to the PRS.

The detailed methodology used to create tenure intelligence is outlined on page 20 of the Housing stock and stressors report, **Appendix 1**.

The data from this review has been used as the foundation for the designation and was the data which Havering used for its scheme consultation.

On the 28 June 2022, the Office for National Statistics (ONS) released Census 2021 population and household estimates, and on 5th January 2023, housing datasets (incl. accommodation type, tenure, rooms and bedrooms, central heating). Therefore, where available, Census 2021 data sets have been provided as a useful comparator to the Metastreet data.

It should however be noted that the data will not be identical as there is a range of error (as is the case with all mathematical models). Also, the census was taken in March 2021, during the third national Covid lockdown. This is likely to have had a significant impact on London's PRS student population, young people on furlough, and migrant workers who may have temporarily relocated to family homes outside of London, resulting in these populations not being properly recorded by the census. The cross-party group, London Councils warns that the number of Londoners is likely to have been significantly undercounted with the census data suggesting that London's total population in March 2021 was almost 300,000 (3%) lower than the ONS previous population projection for 2021³. Whilst some of the Metastreet and Census data differs, both datasets demonstrate that Havering's proposals are robust.

3.2 Options Appraisal

To ensure the decision-making process regarding the inclusion and exclusion of specific wards in the selective licensing scheme was both robust and evidence-based, several datasets and methodologies were employed. The proposed scheme is therefore based on a combination of quantitative data from the Housing Stock and Stressors Report and qualitative insights from officers with localised knowledge.

The primary dataset used to assess housing conditions across the borough was the Housing Stock and Stressors Report. This report is essential for identifying areas where the conditions of rented properties may pose significant risks to tenants. The Council paid particular attention to the

³ <https://www.local.london/census-2021/> + <https://www.onlondon.co.uk/census-figures-for-london-should-be-treated-with-extreme-caution-says-cross-party-body/>

severity and frequency of predicted hazards within each ward. Wards predicted to have higher levels of serious hazards (those that exceed national averages) were prioritised for inclusion in the selective licensing scheme. Conversely, wards that did not exhibit high levels of housing hazards, even with substantial numbers of private rented properties, were considered for exclusion.

Qualitative insights from officers with localised knowledge who are familiar with the local area and the conditions within individual wards, provided valuable context that allowed for a more nuanced interpretation of the data. This insight was crucial in refining the scope of the selective licensing scheme.

Having carefully considered the evidence the Council is proposing to introduce a selective licensing scheme consisting of a single designation, covering 7 of the 20 wards in the borough. The proposed designation equates to 34.5% of the borough's geographical area. Refer to Table 1 below.

| | Ward | Area km2 [LBH Ward Data 2024] | No. of PRS properties including HMOs [Census 2021] | No. of PRS properties including HMOs [Metastreet 2024] |
|-------------------------------------|---------------------------------------|--|---|---|
| Designation | Beam Park | 2.04 | 237 | 758 |
| | Harold Wood | 9.08 | 1,006 | 1241 |
| | Rainham & Wennington | 18.76 | 896 | 1301 |
| | Rush Green & Crowlands | 3.75 | 1,567 | 2235 |
| | Squirrels Heath | 2.98 | 1,171 | 1366 |
| | St Alban's | 1.09 | 1,233 | 1625 |
| | St Edwards | 1.83 | 1,292 | 1948 |
| Wards excluded from scheme | Cranham | 5.29 | 484 | 494 |
| | Elm Park | 4.12 | 861 | 1108 |
| | Emerson Park | 3.51 | 290 | 387 |
| | Gooshays | 7.79 | 811 | 1018 |
| | Hacton | 1.80 | 354 | 499 |
| | Havering-atte-Bower | 10.87 | 754 | 979 |
| | Heaton | 3.23 | 855 | 1153 |
| | Hylands & Harrow Lodge | 2.95 | 637 | 899 |
| | Marshalls & Rise Park | 3.96 | 536 | 765 |
| | Mawneys | 3.02 | 777 | 1006 |
| | South Hornchurch | 2.95 | 565 | 643 |
| | St Andrew's | 2.88 | 1,070 | 1093 |
| | Upminster | 22.54 | 619 | 494 |
| | Totals | 114.44 | 16,015 | 21082 |
| | Total in selective scheme designation | 39.5 | 7,402 | 10474 |
| | % in selective scheme designation | 34.5% | 46.2% | 49.7% |

*Figures are correct to 2 d.p.

Table 1: Geographical area and percentage (%) PRS by ward

According to Metastreet data, the designation in this application will cover 49.7% of private rented properties in the local authority area, including HMOs (Table 1). Census data shows it to be marginally lower at 46.2%.

3.3 The exclusion of thirteen wards from the selective licencing scheme

The thirteen wards of Cranham, Elm Park, Emerson Park, Gooshays, Hacton, Havering-atte-Bower, Heaton, Hylands & Harrow Lodge, Marshalls & Rise Park, Mawneys, South Hornchurch, St Andrew's and Upminster, are currently not being included in the selective licensing scheme proposals. Although these wards have the high levels of housing hazards that are observed in other parts of the borough, the proportion of PRS falls below the 19% threshold required for consideration under the selective licensing criteria. As such they do not meet the necessary conditions to be included within the selective licensing designation,

3.4 General Approval 2024

With effect from 23 December 2024 a new General Approval came into force and local housing authorities in England are no longer required to obtain confirmation from the Secretary of State before implementing a selective licensing scheme of any size. The local housing authority must, however, still satisfy all statutory requirements contained in Part 3 of the Housing Act 2004.

4. Overview of proposed scheme designation

4.1 Number of properties affected

The proposed selective licensing scheme designation covers 7 out of 20 wards in the borough. Metastreet tenure modelling data (2024) predicts that there is a total of 21,082 PRS properties in the borough of which 10,474 properties would fall within the scheme designations (Table 1).

Census 2021 shows the total number of privately rented properties (including HMOs) in the borough to be lower at 16,015 of which an estimated 7,402 would fall within the selective licensing scheme. Excluding known HMOs (370) this equates to an estimated 10,104 properties which will be affected by the scheme.

Havering's PRS inevitably includes a proportion of temporary accommodation procured by other Councils and charities; the number of properties is often difficult to measure due to the varied procurement pathways and nature of accommodation e.g., houses for victims of domestic abuse. This has been mitigated against as Havering is signed up to the pan-London temporary accommodation inspection service, 'Setting the Standard', which separately inspects properties used by local authorities as temporary accommodation to ensure that this accommodation is safe and in good condition. The Private Sector Housing team is informed of any temporary accommodation properties that have category 1 hazards, and PHS officers work closely with colleagues in the Temporary Accommodation team, regularly discussing issues or properties that require joint action.

4.2 Types of properties affected

A local authority's property age profile can have an impact on housing conditions. Havering has a high number of residential properties (41.9%) built pre-Second World War (see Figure 3 below). It is highly likely that a significant number of these properties suffer from category 1 hazards, such as excess cold, poor fire prevention, mould and damp. There is a gradient of risk with the age of the property, the risk being greatest in dwellings built before 1850, and lowest in the more energy efficient dwellings built after 1980⁴.

⁴ [Housing Health and Safety Rating System, Operating Guidance, 2006](#)

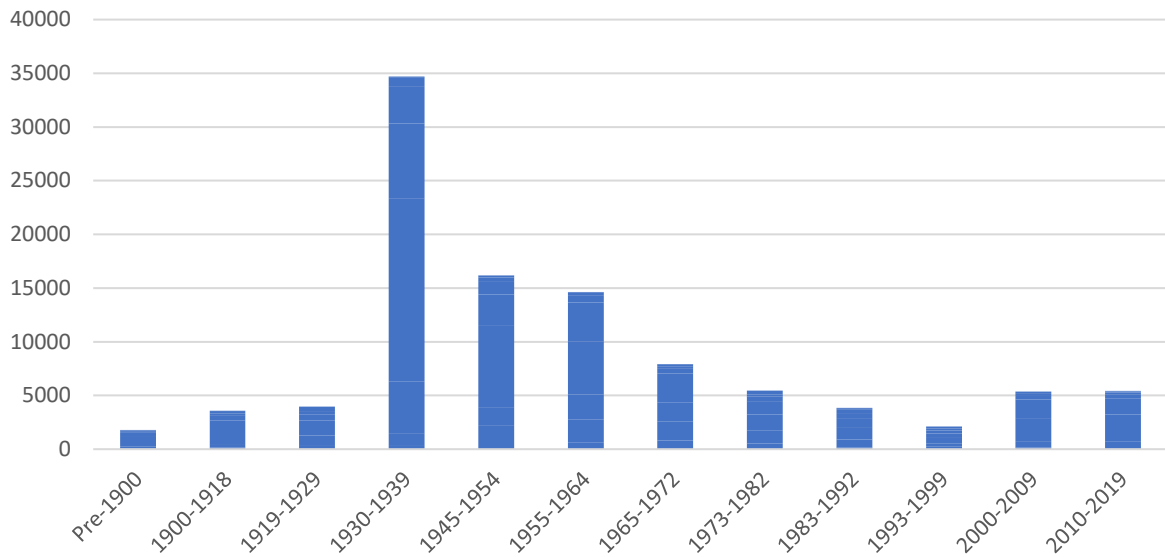


Figure 3: The age profile of Havering's housing stock (%) for all tenures
 [Source: Valuation Office Agency 2019]

The most common private rented property type in the borough is houses (Figure 4) which make up 47% of the housing stock, followed closely by flats at 43% whilst bungalows are the least common type of properties at 4%.

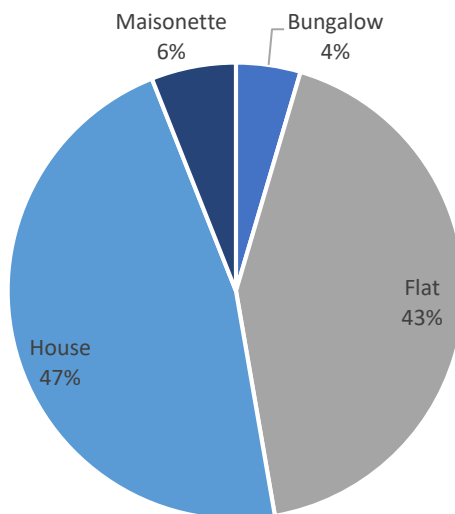


Figure 4: Types of private rental property in Havering as a percentage of the total

4.3 Designation map

The proposed area covers the 7 wards highlighted in yellow on the map below. The wards represent two geographically coherent areas incorporating central and southwestern parts of the borough.

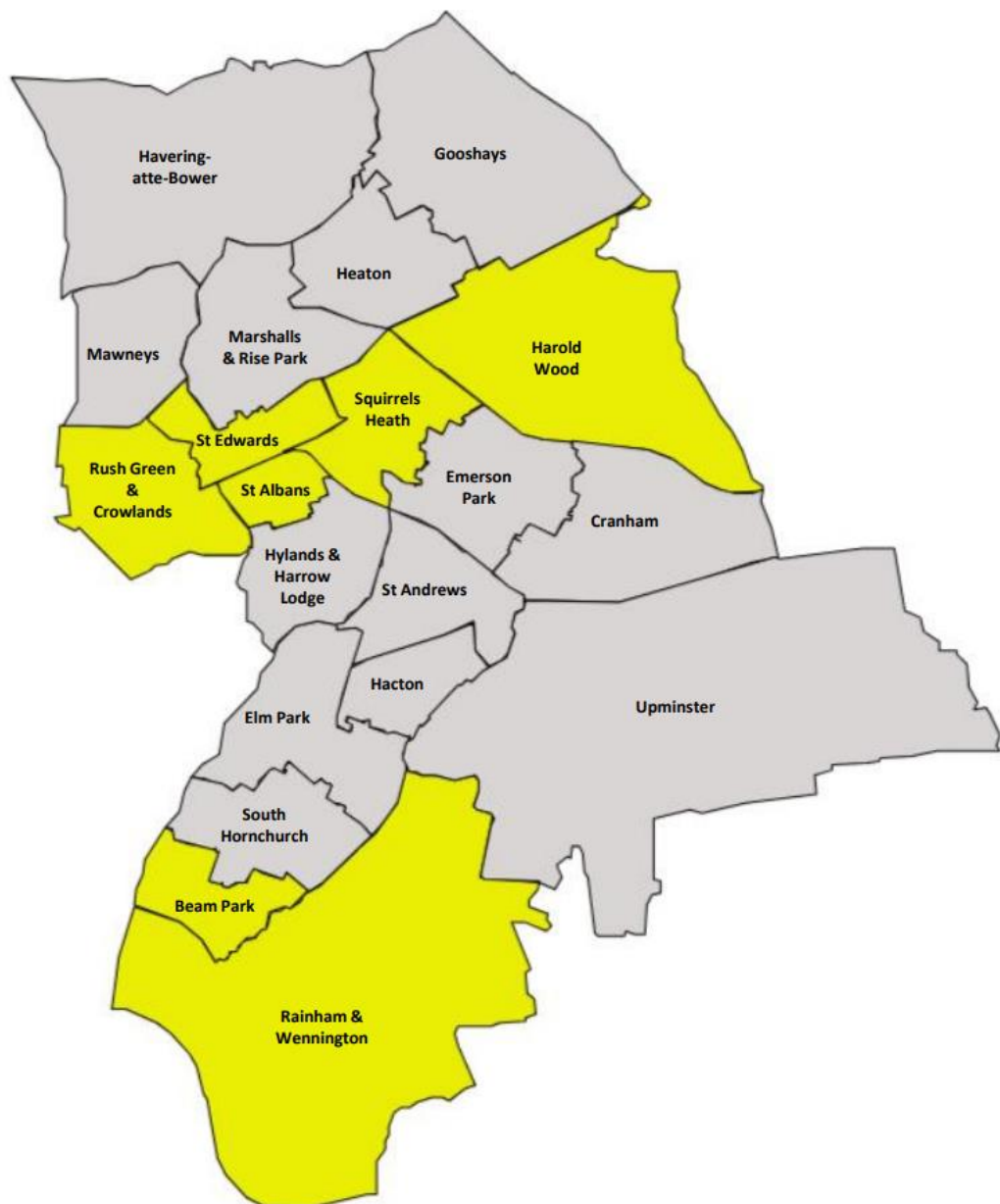


Figure 5: Ward map of Havering with proposed designation

4.4 Other licensing schemes currently operating in the borough

Mandatory HMO licensing scheme

Havering currently operates the national mandatory HMO licensing scheme. There are currently 382 licensed mandatory HMOs operating in the borough. The Council works proactively through communication, publicity, and enforcement so that all mandatory HMOs are licensed.

Additional HMO licensing scheme

In addition to the national mandatory HMO licensing scheme, Havering has implemented two additional licensing schemes. The first scheme was introduced on 1 March 2018 across 12 wards. This scheme expired on 28 February 2023. A second additional licensing scheme was introduced on 25 January 2021 and applied to the remaining wards not designated in scheme 1. This scheme expires on 24 January 2026.

Both scheme designations applied to all HMOs that do not fall within the scope of mandatory HMO licensing, including all properties shared by three or four people who are not related and share facilities. This includes flats within purpose-built blocks that were previously exempt from licensing under mandatory licensing and section 257 HMOs.

Selective Licensing

Selective licensing is another type of discretionary licensing available to local authorities under Part 3 of the Housing Act 2004. It, requires those managing or having control of other privately rented accommodation - excluding those already licensed by HMO schemes, to obtain a licence to let their property. This includes, but is not necessarily limited to, properties rented to either an individual, a single family or two unrelated sharers.

In January 2021, Havering also introduced a Selective Licensing scheme covering Brooklands and Romford Town. As a result of the ward boundary changes in May 2022 these areas are now represented by 3 wards: Rush Green and Crowlands, St Alban's & St Edward's. This scheme will expire at the same time as the HMO additional licensing scheme 2 – 24 January 2026.

Since the introduction of these licensing schemes, more than 4,070 licences have been granted.

| Licence type | Licences granted |
|--------------|------------------|
| Mandatory | 382 |
| Additional | 241 |
| Selective | 3,453 |
| Total | 4,076 |

Table 2: Property Licences granted in Havering

5. The legislative framework

5.1 Conditions for introducing selective licensing

Part 3 of the Housing Act 2004 (the Act) sets out the framework for licensing private rented properties in a local housing authority area. Under section 80 of the Act a local housing authority can designate the whole or any part or parts of its area as subject to selective licensing. Where a selective licensing designation is made, it applies to privately rented housing in the area. A selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions. The area is one experiencing:

- low housing demand (or is likely to become such an area)
- a significant and persistent problem caused by anti-social behaviour
- poor housing conditions
- high levels of migration
- high level of deprivation
- high levels of crime

Should a local authority be considering designating an area on the following grounds:

- poor housing conditions and/or
- migration
- deprivation
- crime

Then the local housing authority may only make a designation if the area has a high proportion of housing in the private rented ⁵sector. Nationally the private rented sector currently makes up 19% of the total housing stock in England. The actual number of privately rented properties in each area may be more or less than this, and if it is more than 19%, the area can be considered as having a high proportion of privately rented properties.

It is also a statutory requirement that the properties referred to are occupied either under assured tenancies or licences to occupy.

Before designating a selecting licensing scheme, the Council must also be satisfied that:

- the proposed designations are consistent with the overall housing strategy,
- a co-ordinated approach is adopted in dealing with homelessness, empty properties, regeneration and ASB associated with privately renting tenants
- there are no alternative courses of action available that would achieve the objectives that the designation is intending to achieve, and
- can demonstrate how licensing will work in conjunction with existing initiatives (such as landlord accreditation) and partnerships.

⁵ <https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities>

5.2 Consultation requirements

Section 80(9) of the Housing Act 2004 requires that when considering designating a selective licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, for a period of at least 10 weeks and consider any representations made in accordance with the consultation and not withdrawn.

5.3 Duration and notification of a licensing scheme

If a designation is confirmed, it cannot come into force until three months after it is made. The introduction of the scheme may be delayed up to an additional 3 months, if need be, to prepare for the scheme's implementation. This is to avoid an excessive delay between the consultation and the scheme's introduction, to ensure consultation requirements are met and persons who are likely to be affected by the designation have been consulted.

Section 59 of the Act requires local housing authorities to publish a notice of the designation once it has been confirmed. A local housing authority must:

- publish a notice within the designated area within seven days of the designation being confirmed.
- notify all those consulted on the proposed designation within two weeks of the designation being confirmed.

A designation ceases to have effect no later than 5 years after the date on which it comes into force.

5.4 Providing data to MHCLG

Local authorities must provide data to MHCLG at the start and end of selective licensing schemes. At the commencement, they need to report the scheme's dates, location, type (new/renewal), number of PRS properties, proportion of PRS stock covered, designation criteria, and licensing fees. At the end, they must report the total number of licenses issued, value of fees, costs, and how the scheme addressed its objectives, including performance against KPIs, case studies, or review outcomes.

5.5 Local authority review of a selective licensing scheme

Section 84 (3) of the Act requires local housing authorities to review the operation of a designation made by them from time to time. As part of the best practice guidance included in the General Approval, local authorities are requested to publish the outcome of any reviews that they undertake in respect of the selective licensing scheme(s) in a timely manner on their website. If following a review, they consider it appropriate to do so, they may revoke the designation.

5.6 Proposed Scheme Criteria

The Council is proposing to designate its selective licensing scheme under the following criteria:

| Designation | Designation Criteria |
|-------------|-------------------------|
| 1 | Poor housing conditions |

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6. Demonstrating compliance with legislative criteria: Poor Housing Conditions

6.1 Criterion: Poor Housing Conditions

A selective licensing scheme being proposed under the poor housing conditions criteria must provide evidence of the following:

- (a) that the area contains a high proportion of properties in the private rented sector, in relation to the total number of properties in the area
- (b) that the properties referred to in sub-paragraph (a) are occupied either under assured tenancies or licences to occupy
- (c) that having carried out a review of housing conditions under section 3(1) of the 2004 Act, the local housing authority considers it would be appropriate for a significant number of the properties to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises
- (d) that the local housing authority intends to carry out such inspections as referred to in sub-paragraph (a), with a view to carrying out any necessary enforcement action; and
- (e) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

Poor housing conditions is a criterion for the designation

The proposed designation has high levels of poor housing conditions and meets the statutory requirements for this criterion in the legislation and guidance cited above. To satisfy the requirements for designating an area for selective licensing on the grounds of poor housing conditions, the Council must show that:

The area contains a high proportion of properties in the PRS, in relation to the total number of properties in the area.

All wards in the proposed designation have a high proportion of properties in the PRS when compared with the average in England of 19%⁶. Overall, 19.3% of the housing stock in the entire borough (including HMOs) is privately rented and the proposed designation contains 49.7% of the privately rented housing stock.

In accordance with Metastreet tenure modelling, the wards in the designation have a predicted PRS in the range of 20.1% (Squirrels Heath) to 44.6% (St Alban's); which is higher than the English Housing Survey national average (England) of 19%.

⁶ [English Housing Survey - 2023/24 - Intro and Key Findings](#)

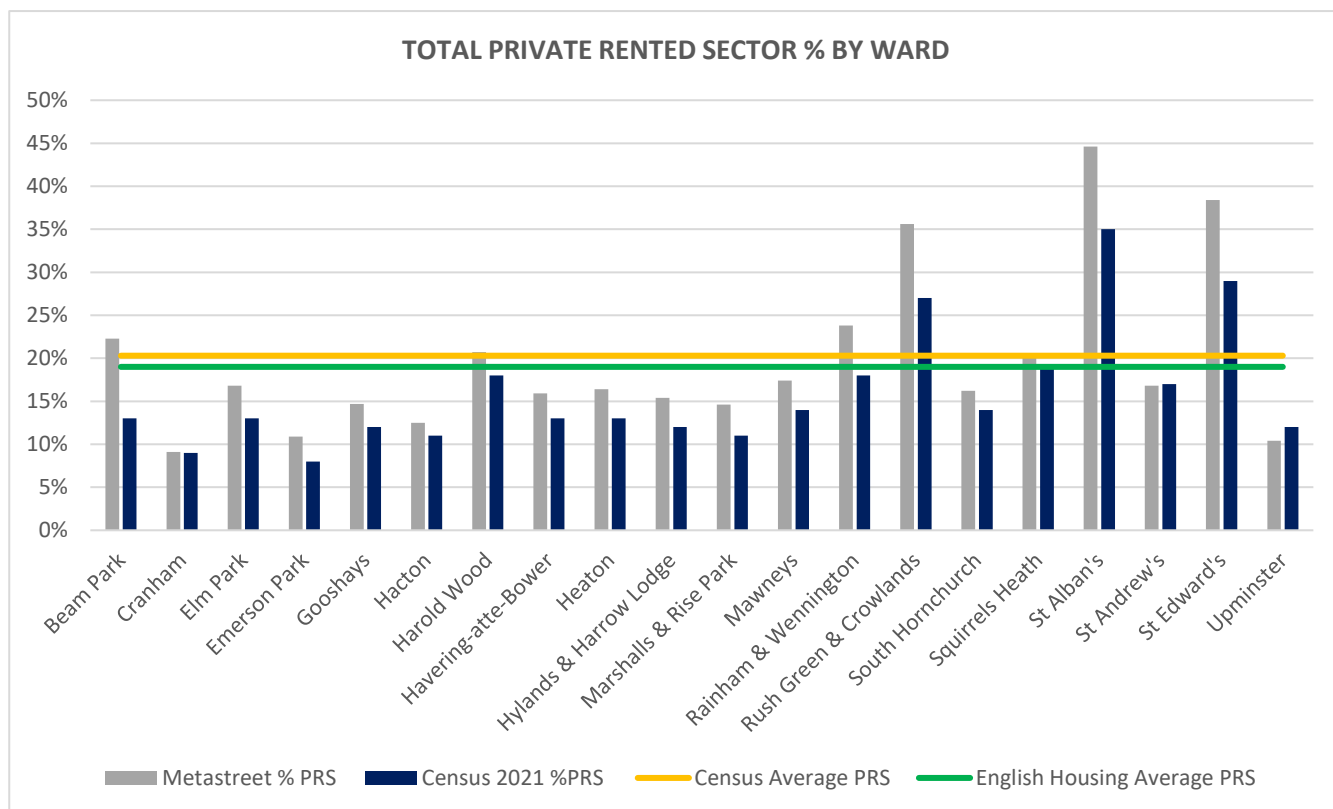


Figure 6: PRS percentage of total housing stock by ward

| Ward | Metastreet [2024] | |
|------------------------|--------------------------------------|---------------------------------|
| | No. of PRS properties including HMOs | % PRS properties including HMOs |
| Beam Park | 758 | 22.30% |
| Harold Wood | 1,241 | 20.70% |
| Rainham & Wennington | 1,301 | 23.80% |
| Rush Green & Crowlands | 2,235 | 35.60% |
| Squirrels Heath | 1,366 | 20.10% |
| At Alban's | 1,625 | 44.60% |
| St Edward's | 1,948 | 38.40% |
| Total | 10,474 | 49.68% |

Table 3: Total Percentage (%) of PRS properties in designation – Source: Metastreet

Have homes which are let on assured tenancies or licences

Although no formal data is available, since the Housing Act 1988, Assured Shorthold tenancies are the most common type of tenancy in the private rented sector. The Council's Housing Needs Service and Private Sector Housing Teams day-to-day on the ground experience supports this finding as most tenants they deal with are assured shorthold tenants. Based on the professional experience of officers, the council are satisfied that a high proportion of private rented properties in the borough are rented out as assured tenancies or licences.

That having carried out a review of housing conditions under section 3(1) of the Act, the local housing authority considers it would be appropriate for a significant number of the properties in the private rented sector to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises, with a view to taking any necessary enforcement action.

By reviewing the housing conditions under section 3(1) of the Act, it was found that the 7 wards across Havering have high levels of poor housing conditions. The Housing Stock and Stressors report demonstrates that 2,192 (21%) private rented properties (excluding HMOs) in these 7 wards are predicted to have a serious hazard (category 1 and high scoring category 2 hazards), compared to the national average of 10%. This is impacted further by a lack of affordable housing and high rents as a proportion of median earnings, meaning tenants often don't have a choice when it comes to living in sub-standard accommodation.

Havering considers it appropriate to inspect a significant number of these properties to determine whether category 1 or 2 hazards exist and then take the necessary enforcement action to remediate the hazards identified. The Council's existing powers rely on tenant complaints and therefore cannot proactively inspect properties and work with landlords to improve property standards in the borough at the scale the Council believes is needed. This licensing scheme would allow the Council to prioritise enforcement action under Part 1 of the Act and use licence conditions under Part 3 to ensure that the properties are properly managed to prevent further deterioration of the PRS.

The Council will improve properties in the designation using a combination of informal and formal actions, including the service of statutory housing and public health notices, civil penalties and prosecutions for the worst and most severe cases, alongside other Council strategies.

That making the designations will, when combined with other measures taken in the area by the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

Making these designations, combined with enforcement, licence conditions, other Council strategies and joint working with partners, will contribute to an improvement in general housing conditions in the area. (See sections 6, 7, 8, 9, 11 and 12).

6.2 Review of housing conditions

An independent Housing Stock Report was commissioned by the Council in exercise of its duty to review housing conditions in its area under section 3(1) of the Act (Appendix 1). A stock-modelling approach based on metadata and machine learning was used to provide predictive insights about the prevalence and distribution of serious hazards (category 1 and high scoring category 2 hazards) in the borough's private rented sector. The model used data including previous housing complaints and enforcement activity, energy performance data, and other property-related data indicating poor property conditions.

The housing stock review found that in these proposed 7 wards, 2,192 properties (excluding HMOs) are likely to have at least one serious hazard. Due to the nature of these types of hazards, they will be endangering the health and safety of the properties' occupants. According to the English Housing Survey Headline Report 2023-24, 10% of privately rented dwellings have at least one serious category 1 hazard, assessed using the Housing Health and Safety Rating system (HHSRS) under Part 1 of the 2004 Housing Act. All the 7 wards in the designation have levels of

serious housing hazards that are above the national average of 10%⁷. This is shown in Figure 7 and Table 4 below. From the experience of council officers, these properties are also highly likely to also have at least one category 2 hazard.

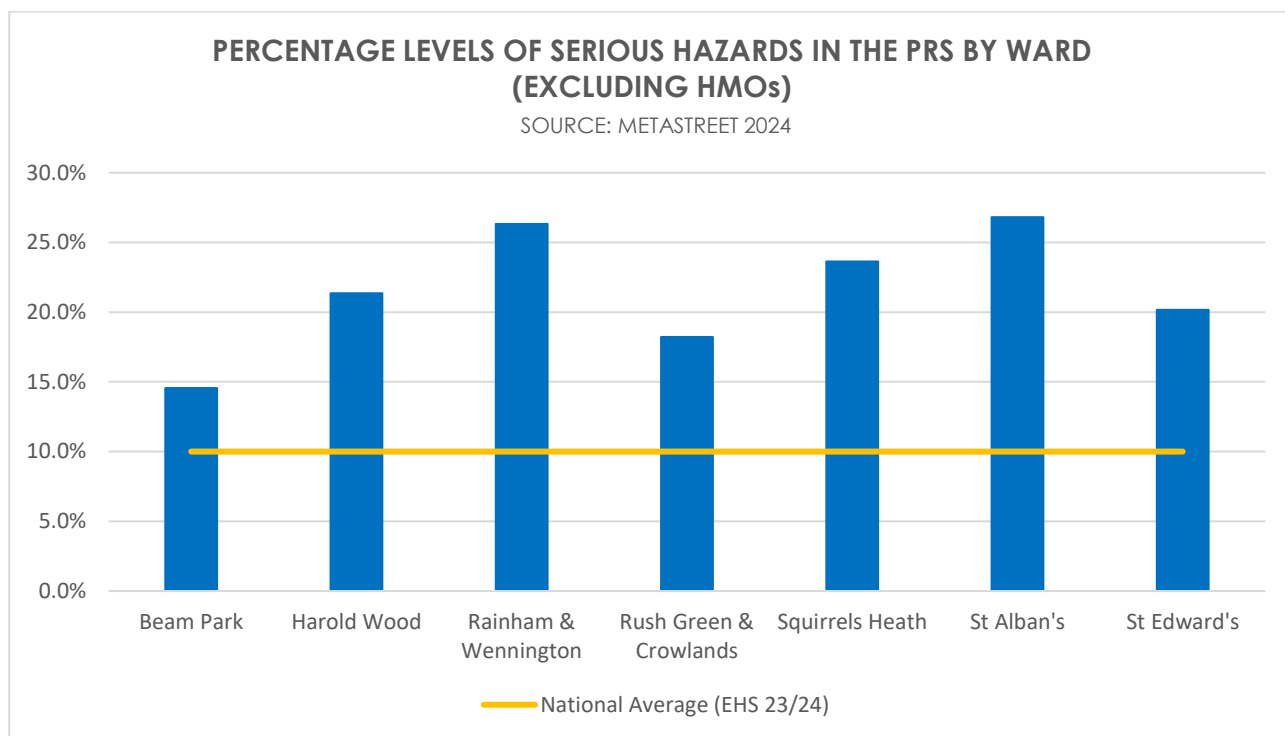


Figure 7: Predicted levels of serious hazards in the PRS by wards proposed in the scheme (excluding HMOs)

| Levels of predicted PRS and serious hazards in designation area [Source: Metastreet 2024] | | | | |
|--|------------------------|-----------------------------|--|--|
| Ward | % PRS (excluding HMOs) | No. of PRS (excluding HMOs) | % of PRS with at least 1 serious hazard (excluding HMOs) | No. of PRS with at least 1 serious hazard (excluding HMOs) |
| National average | 19% ⁸ | | 10% ⁹ | |
| Beam Park | 21% | 728 | 15% | 106 |
| Harold Wood | 20% | 1194 | 21% | 255 |
| Rainham & Wennington | 23% | 1242 | 26% | 327 |
| Rush Green & Crowlands | 34% | 2146 | 18% | 391 |
| Squirrels Heath | 19% | 1320 | 24% | 312 |
| St Alban's | 43% | 1570 | 27% | 421 |
| St Edwards's | 37% | 1884 | 20% | 380 |
| Total | 49.4% | 10084 | 21.7% | 2192 |

⁷ [English Housing Survey 2023 to 2024 - Headline Findings](#)

⁸ [English Housing Survey 2023 to 2024: headline findings on demographics](#)

⁹ [English Housing Survey 2023 to 2024 - Headline Findings](#)

Table 4: Levels of predicted PRS (%) and serious hazards in designation area

6.4 Damp and mould

Damp and mould are one of 29 hazards assessed under the HHSRS. The HHSRS is a tool used to assess risks in residential properties. Hazards assessed at the most dangerous level using issued Government guidance are classified as 'category 1'. All other assessable hazards that are judged to be significantly worse than average are 'category 2' hazards. Local authorities have a duty under the Act to take enforcement action on category 1 hazards and a power to take enforcement action on category 2 hazards.

Damp and mould are critical indicators of **poor housing conditions**, with far reaching consequences for both property integrity and human health. These issues compromise the structural soundness of buildings by causing rot, decay and long term damage to walls, ceilings and fixtures. At the same time, damp and mould pose significant health risks - exacerbating respiratory illnesses, triggering allergies, and causing mental health issues like anxiety and depression. This could be due to worries about the health impacts of damp and mould, the stress of living in unpleasant living conditions and the loss or damage of personal belongings. This combination of structural deterioration, health hazards, and emotional distress, creates an unsafe and unhealthy living environment.

Everyone is vulnerable to the health impacts of damp and mould, but people with certain health conditions, children and older adults are at greater risk of more severe health impacts. In 2022, the media reported widely on poor conditions caused by damp and mould in social and private rented housing. This was primarily prompted by highlighting the tragic case of two-year-old Awaab Ishak who died in 2020 due to prolonged exposure to mould in his home.

Certain groups are more likely than others to live in homes with damp and mould¹⁰. This includes:

- people with a long-term illness
- people who struggle to heat their homes and/or are experiencing fuel poverty
- people on low incomes
- people with disabilities
- people from ethnic minority backgrounds
- people living in temporary accommodation.

6.5 Overcrowding

Overcrowding is a secondary impact of housing unaffordability. A household is classified as overcrowded if it has fewer bedrooms than it needs to avoid undesirable sharing, based on the age, sex and relationship of household members. 13.6% of privately rented households within Havering are overcrowded. This is slightly lower than the London average of 15%¹¹ but higher than the average for England of 8.5%¹² (Figure 8).

Overcrowding contributes to poor housing by increasing wear and tear on properties, elevating the risk of disease transmission due to close contact, making it harder to maintain hygiene and control pests, and exacerbates hazards such as damp and mould due to the increased laundry and cooking activities required to cater to more people in a confined space. This strain can lead to

¹⁰ [Understanding and addressing the health risks of damp and mould in the home](https://www.gov.uk/government/consultations/understanding-and-addressing-the-health-risks-of-damp-and-mould-in-the-home) GOV.UK (www.gov.uk)

¹¹ [Census 2021](https://www.census.gov)

¹² [Overcrowding and under-occupancy by household characteristics, England and Wales](https://www.ons.gov.uk/peoplepopulationandcommunity/healthandcare/articles/overcrowding-and-under-occupancy-by-household-characteristics-england-and-wales) - Office for National Statistics

more frequent and more severe problems in the building's structure and systems: insulation and ventilation cannot generally cope with the extra demand. The HHSRS states that 'crowded conditions can result in a moisture burden above that which the dwelling is designed to safely deal with, and this can be a cause of condensation and high humidities, giving rise to associated health risk'¹³. Ultimately this worsens the overall living conditions for the residents.

Evidence indicates that **poor housing conditions** and overcrowding negatively affect physical and mental health and can also have a major impact on educational achievement. For example, children's education may be affected by overcrowding directly, through a lack of space for homework, as well as indirectly because of school absences caused by illness¹⁴.

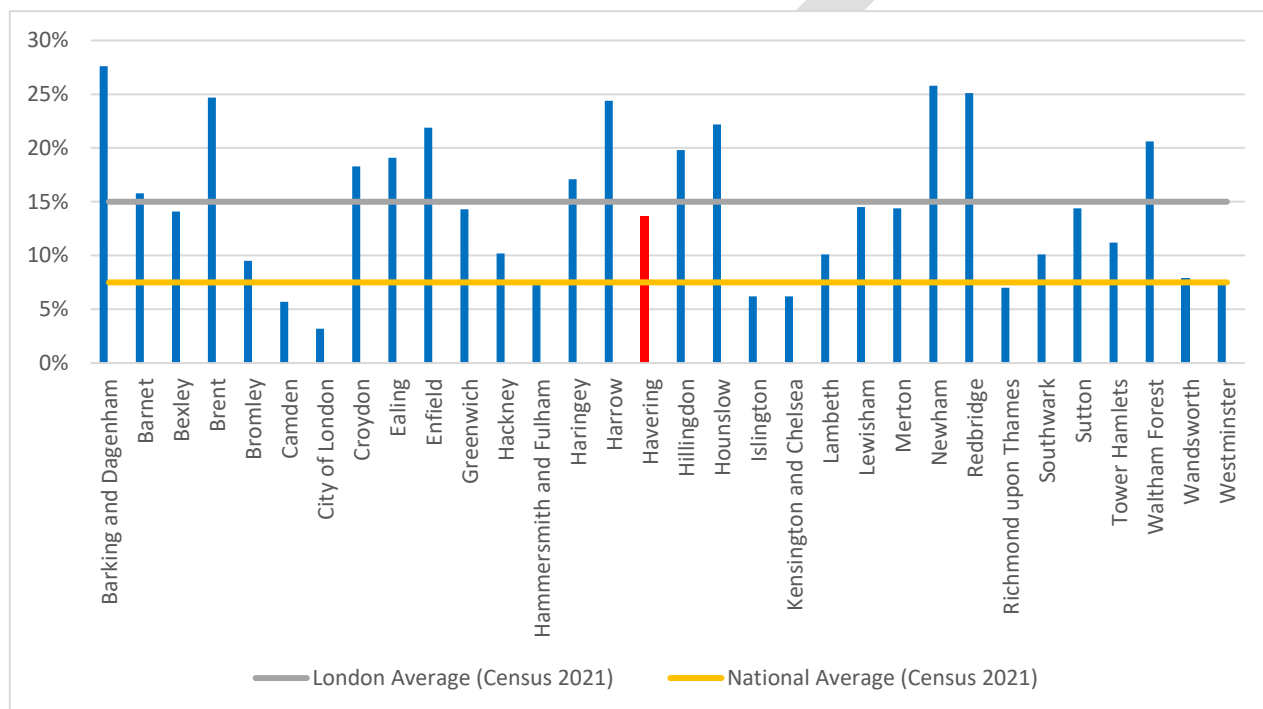


Figure 8. Percentage of overcrowded PRS properties by London borough (Census 2021)

6.6 Fuel Poverty

Whilst energy prices in the UK are no longer near the extreme highs seen in late 2022 and early 2023, energy prices remain high and unaffordable for many. With growing pressure on household finances because of increasing energy costs and wider concerns about the cost of living, there are reports that households are choosing between “heating or eating” over the winter months.

Fuel poverty worsens **poor housing conditions** by forcing people into homes that are not energy efficient and where they cannot afford adequate heating. This leads to cold, damp, and poorly maintained properties, increasing health issues like asthma and making homes colder and more costly to run. The cycle of fuel poverty is driven by low household income, high energy costs, and poor energy efficiency, creating a mutually destructive relationship between occupants and their living space.

¹³ [HHSRS Guidance](#)

¹⁴ [The impact of bad housing on children's lives \(Shelter\)](#)

6.7 Minimum Energy Efficiency Standard (MEES)

An EPC rating is an assessment of a property's energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property; G indicates low efficiency.

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC rating of A-E to be compliant. Currently in Havering 13.9% of PRS properties have an E to G rating with 1.2% having an F and G rating¹⁵. The statistical evidence shows that there is a continuous relationship between indoor temperature and vulnerability to cold-related deaths¹⁶. The colder the dwelling, the greater the risk. The percentage rise in deaths in winter is greater in dwellings with low energy efficiency ratings. Therefore, the F and G properties present a serious risk to the occupants' health, particularly if over the age of 65.

Not only does poor energy efficiency contribute to poor housing conditions by causing low indoor temperatures, the mismanagement or implementation of efficiency measures can lead to problems like poor indoor air quality and damp and mould growth. Specifically, efforts to improve energy efficiency by reducing ventilation without adequate mechanical systems can trap moisture and pollutants, causing health hazards and structural issues. Additionally, if energy efficiency measures are not coupled with affordable energy and sufficient heating, it can lead to fuel poverty and cold, unhealthy living conditions.

6.8 Age and type of properties

As described at section 4.2 above, a high proportion of properties in Havering were built pre-Second World War (43%) and as such are at a greater risk of being in disrepair and having both category 1 and 2 hazards.

6.9 Levels of housing complaints and service requests in the designated wards

Whilst the Housing Stock and Stressors report is an estimate of the number of housing hazards that are likely to be present in these wards, the number of actual housing complaints and the resulting statutory notices are additional evidence of the level of severe issues in the designation. Complaints and service requests made by PRS tenants to the council about poor property conditions and inadequate property management are a direct indicator of low quality PRS. Havering received 1,219 complaints and service requests from PRS tenants (excluding HMO tenants) in these seven wards over the period 2021-2024.. Rush Green & Crowlands (148) and St Alban's (134) had the highest number of complaints and service requests (Figure 9).

¹⁵ [Housing Stock Condition and Stressors Report \(Metastreet 2024\)](#)

¹⁶ [Housing Health and Safety Rating System](#)

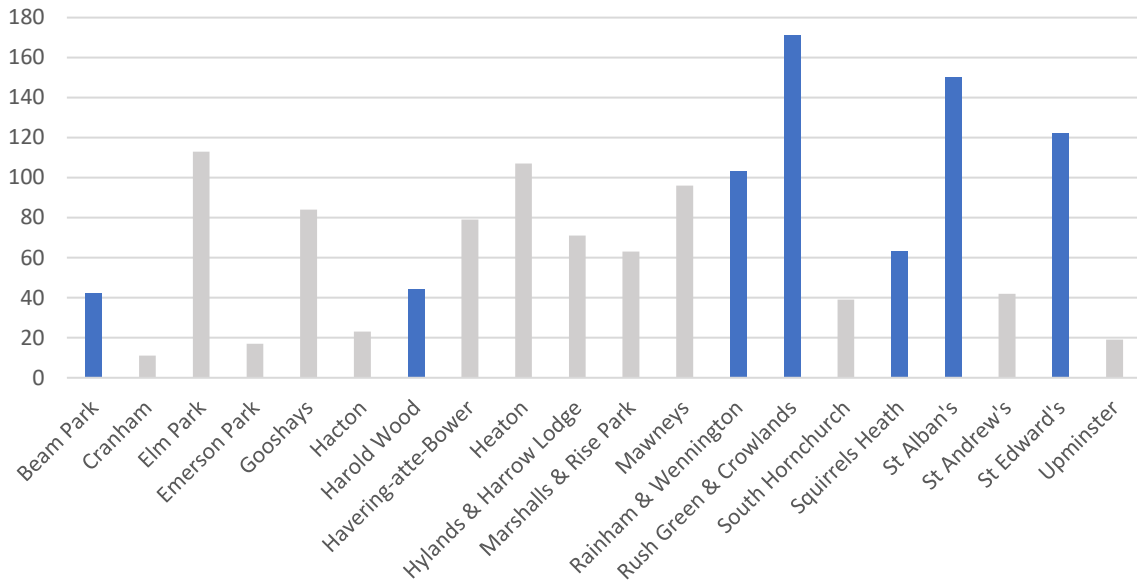


Figure 9. Complaints linked to PRS properties (Excl. HMOs) by ward (Source Metastreet 2024)

6.10 Public perception of poor housing conditions

During the consultation on selective licensing, Havering Council asked respondents for their views on problems related to the borough as a whole and within the private rented sector.

Respondents were asked to what extent they believed that poor property conditions were a problem in the borough. 31%, stated that they thought that poor property conditions were a very big or a fairly big problem, 42% thought poor property conditions were not a very big problem and 28% thought they were not a problem at all (Figure 10).

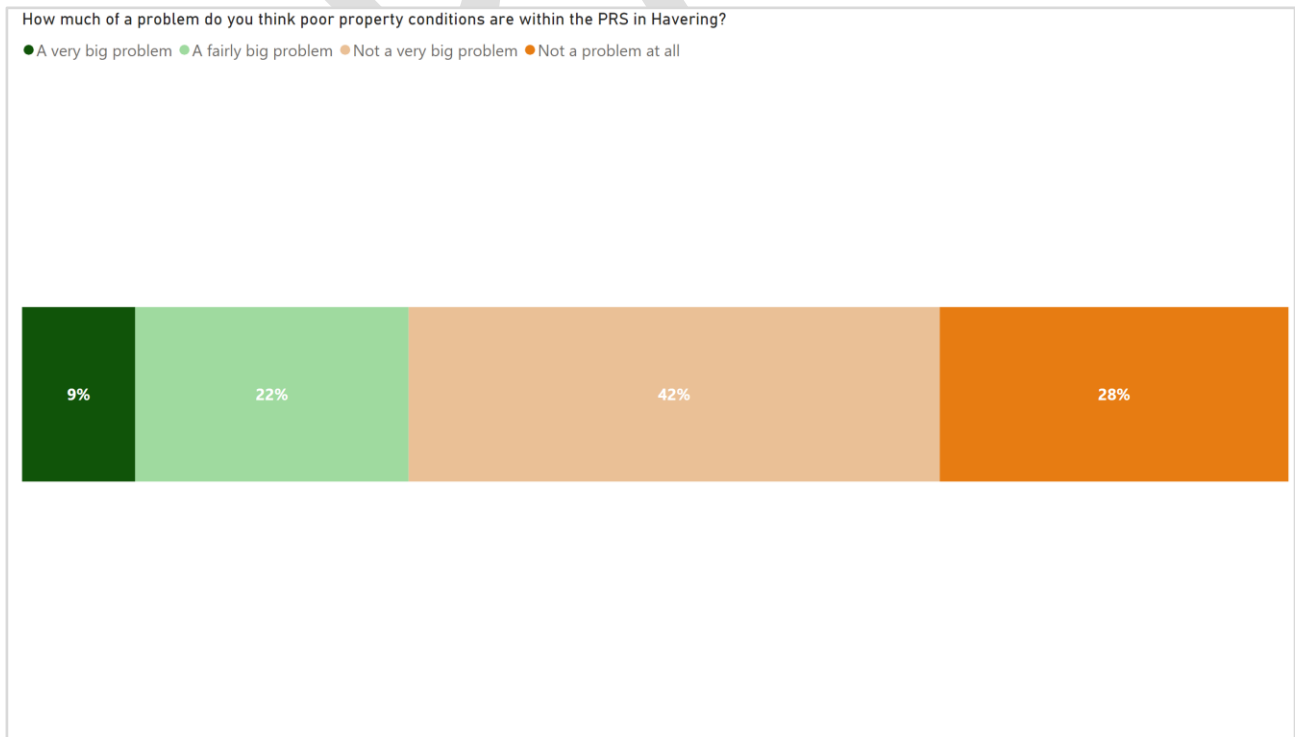


Figure 10: Respondents views on poor property conditions in Havering

Looking at responses by stakeholder group, there is disparity between the views of landlords, letting and managing agents and those of residents or businesses and other stakeholders; where 93% of landlords, letting and managing agents viewed poor property conditions as not a very big problem or not a problem at all, only 53 per cent of residents or local businesses concurred. However, 66 per cent of other stakeholders held the opposing perspective and viewed poor property conditions as a fairly big or very big problem. (Figure 11).

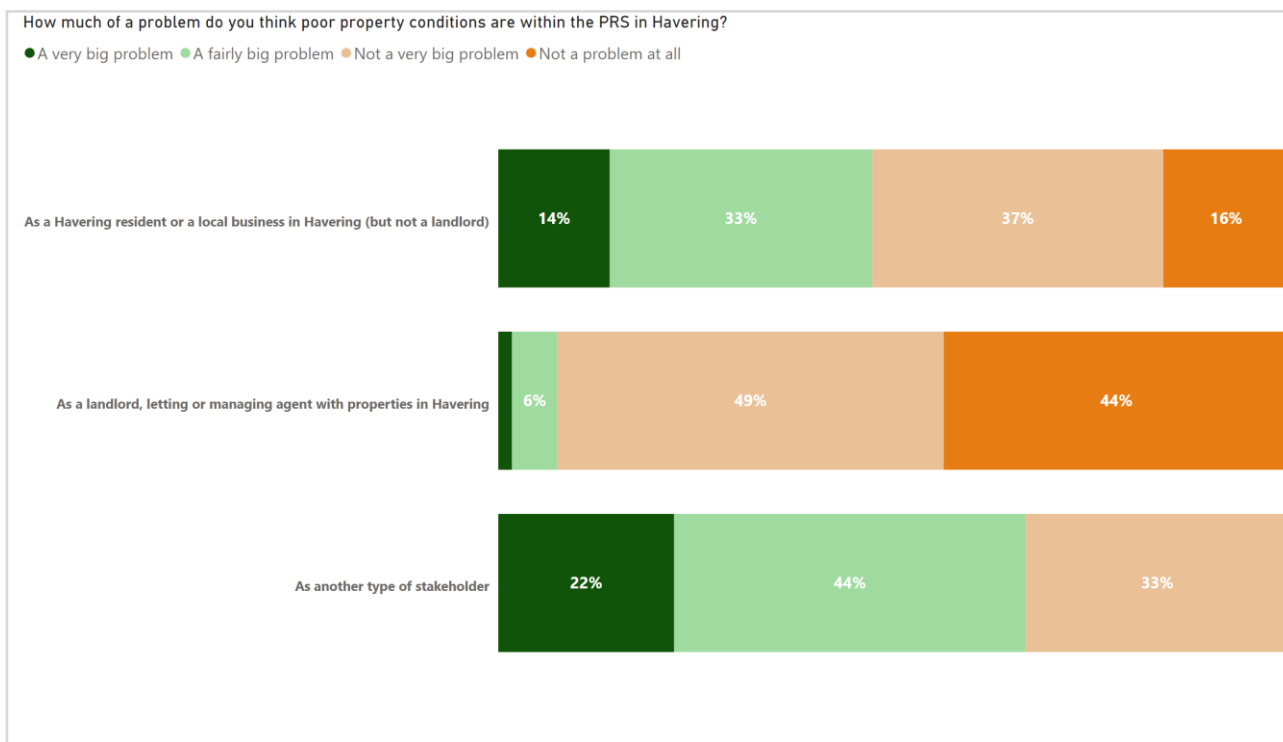


Figure 11: Respondents views on poor property conditions in Havering by stakeholder type

Respondents were also asked their views on issues related particularly to the private rented sector. Respondents were asked to what extent they believed that the physical condition of private rented properties were a problem in the borough. 39% of respondents either agreed or strongly agreed, while 34% of respondents disagreed or strongly disagreed (Figure 12).

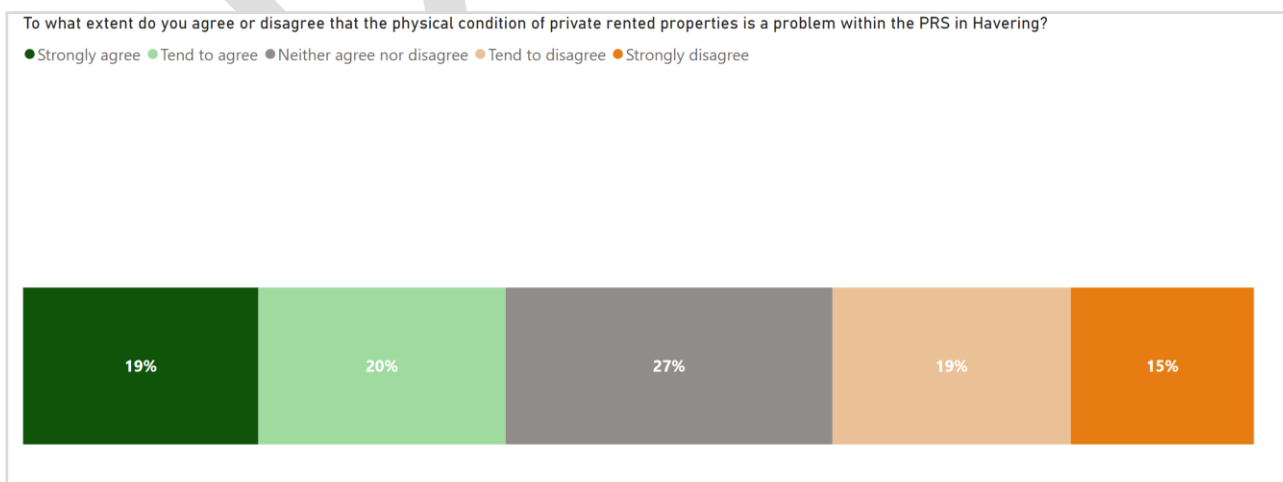


Figure 12: Respondents views on the physical condition of PRS in Havering

When looking at the respondent type, of respondents who were either residents or businesses 65% either agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. In contrast only 4% of landlords or agents agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. 66% of all other stakeholders thought it was a very big or fairly big problem (Figure 13).



Figure 13: Views on physical conditions of PRS properties being a problem in Havering by respondent type

Respondents were asked to what extent they agreed that poorly maintained properties were contributing to the decline in some areas in Havering. 49% of respondents either agreed or strongly agreed, while 33% of respondents disagreed or strongly disagreed (Figure 14).

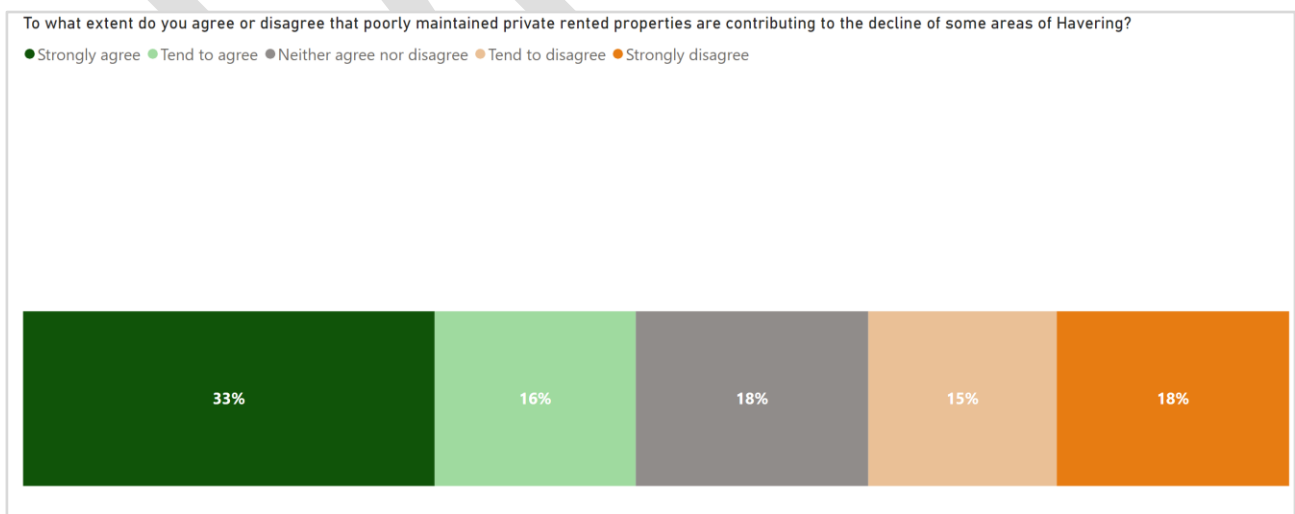


Figure 14: Views on poorly maintained PRS properties in Havering

When looking at the respondent type, of respondents who were either residents or businesses, 75% either agreed or strongly agreed that poorly maintained properties were negatively impacting some areas in Havering. In contrast only 14% of landlords or agents agreed or strongly agreed that the physical condition of private rented properties is a problem in Havering. For the group that encompassed all other stakeholders, 66% thought it was a very big or fairly big problem (Figure 15).



Figure 15: Respondents views on property maintenance in the PRS

When asked whether poorly managed private rented properties were negatively impacting some areas in Havering, 49% either agreed or strongly agreed (Figure 16).

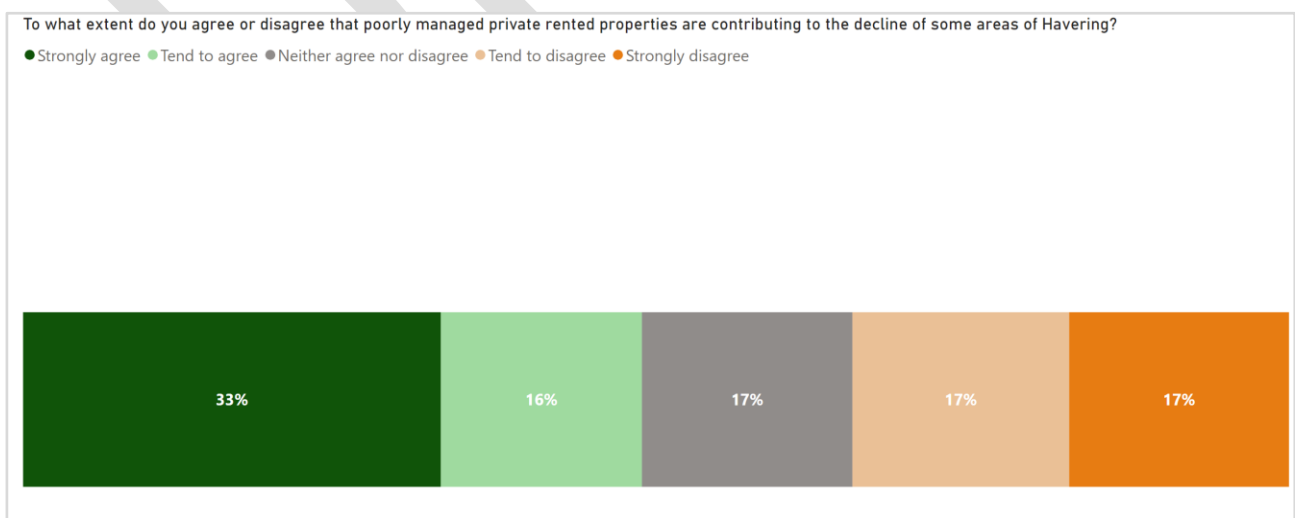


Figure 16: Respondents views on poorly managed PRS properties in Havering

When looking at the respondent type, of respondents who were either residents or businesses, 76% either agreed or strongly agreed that poorly managed properties were negatively impacting some areas in Havering. In contrast only 14% of landlords or agents agreed or strongly agreed that the poor management of private rented properties is a problem in Havering 55% of the other stakeholders who were neither residents or businesses nor landlords, letting or managing agents with properties in Havering, thought it was a very big or fairly big problem (Figure 17).

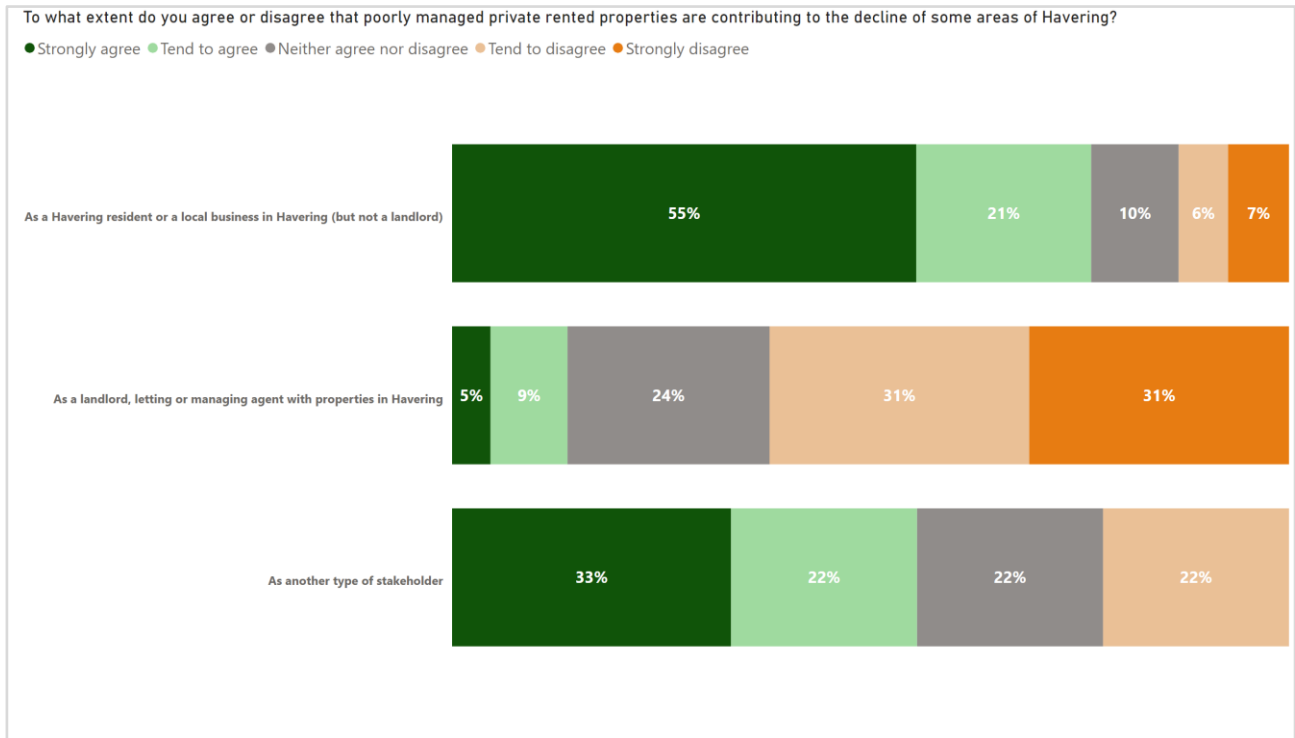


Figure 17: Respondents views on the management of PRS properties

The consultation results indicate a consensus among respondents that there are significant issues with private rented properties in the borough, including poor physical condition, inadequate maintenance and poor management. The results also highlight the difference between landlord's perception of property conditions and the management of private rented homes and the lived experience of all other stakeholders. It is likely that this stems from their differing perspectives on licensing schemes. Tenants see licensing schemes as beneficial, providing an added layer of protection that can lead to improved living conditions, while landlords often perceive them as an extra regulatory burden. Despite these opposing views, the licensing scheme aims to balance the interests of both tenants and landlords. The scheme seeks to protect tenants from substandard living conditions while also providing clear guidelines for landlords to follow in managing their properties.

6.11 Inspections to be carried out with a view to carrying out any necessary enforcement

The review of housing conditions under section 3(1) of the Act, identified a significant number of properties in the PRS that need to be inspected with a view to determining whether any category 1 or 2 hazards exist on the premises and taking any necessary enforcement action for remediation. Within the designated area, it is predicted that 2,192 private rented properties (excluding HMOs) have at least one serious hazard.

The designation of these wards will allow Havering Council to deal with some of the worst property conditions in the borough at scale. The Private Sector Housing team would have targets to inspect, intervene and improve sub-standard dwellings.

It is the Council's intention to risk assess all applications. Higher risk properties will be prioritised for inspection by officers to check for hazards and compliance with licence conditions. The Council will take the full range of necessary enforcement actions, including the additional regulatory controls afforded by property licensing, to improve poor property conditions.

The objectives for the scheme state that the Council will improve housing conditions in the PRS and improve management standards in PRS properties. All private rented property licence applications will receive a desk-based risk assessment. Compliance inspections will be undertaken in at least 70% of selectively licensed properties and 100% of HMO properties over the five-year life of the scheme. It is anticipated that this will lead to at least 70% of properties being improved via compliance inspections alone and subsequent enforcement action where required.

It is also the Council's intention to inspect all properties when a complaint of poor conditions and disrepair is received and to take any necessary enforcement action to remediate any hazards identified. Through this inspection regime the Council will ensure that any Category 1 and 2 hazards identified are remediated and licence conditions complied with. This will achieve a general improvement of property conditions in the designated area within the lifetime of the designation. See case study 1 below.

Case study 1: Unlicensed property brought into compliance

Background

The Private Sector Housing Team received a complaint from a tenant regarding significant disrepair in their rented property. The tenant described a persistent leak from the first-floor bathroom, causing water damage to the kitchen below, including damp, mould, and water seeping through the light fixture. Despite repeated attempts to inform the landlord and request repairs, no action was taken. Council officers' initial investigations revealed the property, located in a selective licensing area, was unlicensed, with no application submitted.



Hazards identified

On inspection, the property was found to have several hazards identified under the Housing Health and Safety Rating System (HHSRS), including a category 1 hazard of damp and mould and category 2 hazards of electrical safety, structural collapse and falling elements, flames and hot surfaces, and food safety.



Council action

The Council served a Housing Act 2004 improvement notice and comprehensive schedule of works requiring the landlord to address the category 1 and 2 hazards. A licence application was pursued and the Council considered a range of additional enforcement actions in relation to the licensing non-compliance.

Outcome

The landlord complied with the notice which led to significant improvements in the property, bringing it up to the required standard. A selective licence application was also received.

The proposed selective licensing scheme would continue to ensure that action is taken against those landlords who choose to neglect their tenants and properties. We shall robustly enforce against any landlords who fail to obtain a licence, who deliberately fail to comply with licensing conditions, or whose properties present serious housing hazards.

6.12 How the Council will use selective licensing to improve general housing conditions in the area

The confirmation of the scheme will allow the Council to have a robust enforcement framework and will enable the Council to provide the enforcement capability necessary to achieve the scheme objectives, improving general housing conditions in the area. The selective licensing scheme will form part of a wider strategy for the Council in improving the PRS in the area and ensuring that safe and decent housing is accessible to people on a range of incomes in a market that is well regulated and offers appropriate protection to tenants. The scheme would form part of a coordinated approach in connection with dealing with homelessness, empty properties, regeneration and anti-social behaviour associated with privately renting tenants.

The legal framework of the licensing scheme enables property issues to be dealt with more effectively:

- The licence application process requires the management arrangements for each licensable home to be confirmed, a nominated Licence Holder to be identified and for key parties involved in the letting/management of the licensed property to pass a 'fit and proper person' test.
- A granted licence is accompanied by a set of conditions which place obligations on the Licence Holder (or another nominated party) in relation to the management, use or occupation. These conditions, for example, currently include requirements to carry out 6-monthly inspections of the rented home to identify any problems relating to its condition and management and to take prompt action to investigate complaints relating to disrepair or pest infestation.
- The Council's Private Sector Housing Team receives approximately 580 service requests each year, many of which relate to reported poor housing conditions in privately rented homes. In most cases the rented home is licensed, and through licensing, the Council has a 'go to' party in the form of the nominated Licence Holder to which most complaints are immediately referred to as part of a triage process.
- Licensing data also enables the ready identification of interested parties should it be necessary to take formal enforcement action although, in most cases, the effective operation of the licensing regime means that property-related defects are remedied informally. In this regard, whilst the Council recognises that there are limitations on what a landlord can be required to do as a condition of a selective licence, it is the case that the evidenced failure of a landlord/Licence Holder to maintain their rented property such that formal action (such as the service of a Notice under Part 1 of the Housing Act – HHSRS) is needed will adversely impact on their ability to be regarded as a fit and proper person able to hold a licence or a full term licence.

The Council will work with, advise and support landlords to address poor property conditions, and achieve compliance with the licence conditions. This will be done through a combined effort as a local authority working in partnership with external partners such as the London Fire Brigade, Justice for Tenants, Safer Renting, the Citizen's Advice Bureau and the Police as well as other Council departments, to identify properties that need improvement.

Poor property conditions can exacerbate factors that make deprivation worse. The licensing inspection regime will enable the Council to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly. For those whose properties fall below the legal requirement and who ignore the advice and support of the Council, the Private Sector Housing team will work with Trading Standards (currently responsible for enforcement of The Domestic Minimum Energy Efficiency Standard (MEES) Regulations) to bring them into compliance.

As outlined in section 6.5 above, overcrowding is another element that makes poor property conditions worse. Selective licensing not only helps the council to identify properties at risk of becoming overcrowded, but sets maximum household occupancy rates, where the property would not be suitable for occupation by multiple households. Where Havering Council find properties are overcrowded, they will work with landlords to reduce occupancy to safe levels, referring tenants to the Council's Housing Solutions Service, or to Citizens Advice for further guidance on their legal rights, their eligibility for housing support and around how to find alternative accommodation, where appropriate.

Communicating the availability of advice and support to landlords is paramount, and the Council has committed to holding two landlord forums per year to update all licensed landlords on changes in legislation, Council policy and other general information and guidance.

The council recognise that having accredited landlords is also key to raising standards in the private rented sector and have actively encouraged all landlords to become accredited to achieve a level of housing knowledge and competence before letting a home. The Council will continue to work with the London Landlord Accreditation Scheme (LLAS) to provide training for landlords. As of 2025, Havering had 1,165 landlords accredited to LLAS, and the Council is expecting to see this number rise following the introduction of a selective licensing scheme.

Where needed and when landlords do not comply with the Council's licensing conditions, fail to license or whose properties present serious housing hazards, the Council will intervene and improve a significant number of these properties, and ensure compliance with licence conditions in properties through a combination of informal and formal enforcement action.

A key objective of the scheme is to increase awareness in tenants on the minimum standards to be expected in rented accommodation. The Council will deliver an education campaign to make renters aware of licensing, tenancy rights and responsibilities and services available. By educating tenants on how to deal with issues that arise in their properties this will also lead to general improvements in the PRS. See case study 2.

Licence conditions:

The conditions that the Council proposes to include in licences granted under the selective licensing scheme are listed in Appendix 4. These will be used to improve the management of properties, support the proactive maintenance of properties, ensure compliance with property standards, and prevent a further deterioration in rented properties in the area.

All licences will contain the mandatory licence conditions in accordance with the Housing Act 2004, Schedule 4. In addition to the mandatory conditions, the Council will include discretionary licence conditions related to the standard and management of properties. Examples of these discretionary conditions include the following:

Condition 9.1

(The Licence Holder must ensure) that prompt action is taken to investigate and effectively address reports of disrepair or pest infestation at the house. The Licence Holder must ensure, in particular, that a written response is made to any such report within 21 days of receipt, stating the action that has been or will be taken.

Condition 9.14

Ensure that the exterior of the house is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly.

Condition 12.5

Ensure that inspections of the house are carried out at least every six months to identify any problems relating to the condition and management of the house. The Authority may increase the frequency of such inspections if it has good reason to be concerned about the condition or management of the house. The records of such inspections shall be kept for the duration of this licence. As a minimum requirement the records must contain a log of who carried out the inspection, date and time of inspection and issues found, and action(s) taken. Copies of these must be provided to the Authority within 21 days on demand.

The Council will use selective licensing, including specific licence conditions imposed under Section 90 of the Act, to bring about an improvement in general housing conditions in the area using a combination of informal and formal actions, including the service of statutory housing and public health notices, civil penalties and prosecutions for the worst and most severe cases, alongside other Council strategies.

Making this designation will, when combined with other measures taken in the area, such as working as a multidisciplinary team alongside internal and external stakeholders including the London Fire Brigade, Home Office, Police, HMRC, [Justice for Tenants](#), Planning Enforcement, Community Safety, Social Services, Housing Needs and Council Tax, will allow the Council to identify areas and properties of concern and continue to improve property conditions in the designated area within the lifetime of the scheme and to prevent further deterioration in the area.



Case study 2: Collaborating with partners to protect the safety and wellbeing of tenants in the PRS

Background

A healthcare professional, following a visit to a tenant, raised concerns about significant disrepair in the tenant's private rented property. The tenant was reluctant to pursue the matter himself due to fears of eviction. Back-office checks confirmed that the property was licensed. Council officers were able to make immediate contact with the licence holder to arrange an inspection of the property.



Hazards identified

On inspection, the property was found to have serious disrepair including a leak from the bathroom to the kitchen, security concerns with the ground-floor windows and rear doors, a trip hazard in the kitchen, a slug infestation, a faulty electrical socket, and potential structural problems with the flank wall.



Council action

A post-inspection letter was sent to the landlord, setting out the issues within the property. The landlord responded promptly, indicating their commitment to addressing the concerns. Remedial works were initiated immediately to rectify the disrepair and ensure the property met all necessary safety standards.



Outcome

Remedial works were completed within the specified timelines. The tenant now has the benefit of replacement windows throughout, a new rear door, new fitted kitchen. The flank wall issue was highlighted on a structural engineer's report to be not significant but works recommended were complied with.

Licensing enables the Council to work with, advise and support landlords to address poor housing conditions and achieve compliance with licence conditions. Additionally, licensing plays a crucial role in educating tenants about their rights and how to deal with issues that arise in their properties. We will continue to collaborate with partners to help protect the safety and wellbeing of tenants in the PRS

7. Proposals for an additional HMO licensing scheme

7.1 Proposed scheme designation area

The evidence base demonstrates that the criteria for a borough-wide additional licensing scheme is met in that a significant proportion of the borough's HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public.

Evidence shows that a significant proportion of HMOs in the borough are being managed ineffectively, proven by the cumulative presence of serious housing hazards.

An additional HMO licensing scheme is proposed that will apply to all wards in the borough. Subject to approval, the scheme will come into force in 2026 and last for a period up to five years.

An additional HMO licence will be required for properties that are HMOs rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities. This excludes HMOs that require a mandatory HMO licence. Multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat are included.

The proposed additional HMO scheme will also apply to converted building HMOs, known as section 257 HMOs. These are properties:

- That have been converted into self-contained flats
- Where the conversion did not comply with the relevant Building Regulations in force at that time and still does not comply; and
- Where less than two thirds of the flats are owner occupied.

There are some types of buildings which are exempt from HMO licensing by law. These include buildings controlled by public sector bodies (for example, housing associations), some buildings occupied by students, and some owner-occupied buildings. A full list of exemptions can be found at Housing Act 2004 (legislation.gov.uk).

7.2 Evidence to support the Council's proposals to implement an additional HMO scheme?

During analysis in preparation for this proposal, HMOs in Havering were divided into two main groups, **known** HMOs (licensed by the authority under Part 2, Housing Act 2004,) and **predicted** HMOs (shared amenity HMOs with 3 or more occupants).

The known HMO group meet the following standards:

- Dwellings inhabited by either three (Additional) or five (Mandatory) or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. This regulation applies irrespective of the number of floors.

The predicted HMO group are based on the following standard:

- Dwellings inhabited by three or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. The property type is not considered.

Havering's HMO population is made up of known HMOs that share basic amenities (410) and predicted HMOs (454). The total HMO population in Havering is therefore calculated to be 864.

The HMO population is distributed across all wards. Rush Green & Crowlands (89) has the most HMOs (Figure 18 and Figure 19).

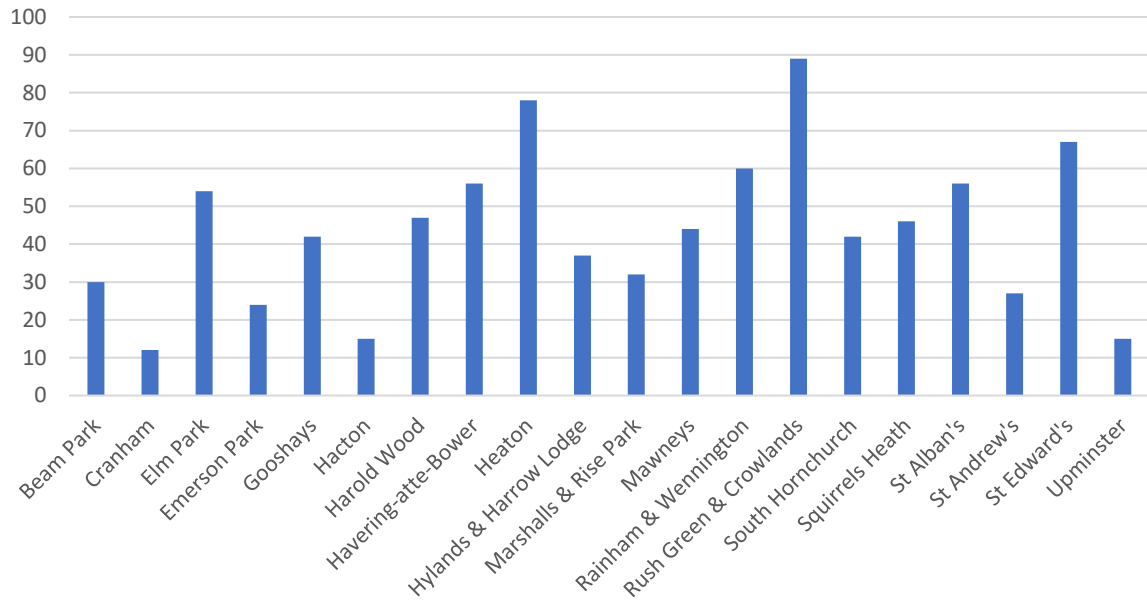


Figure 18. Number of HMOs by ward (known and predicted) (Source Ti 2024)

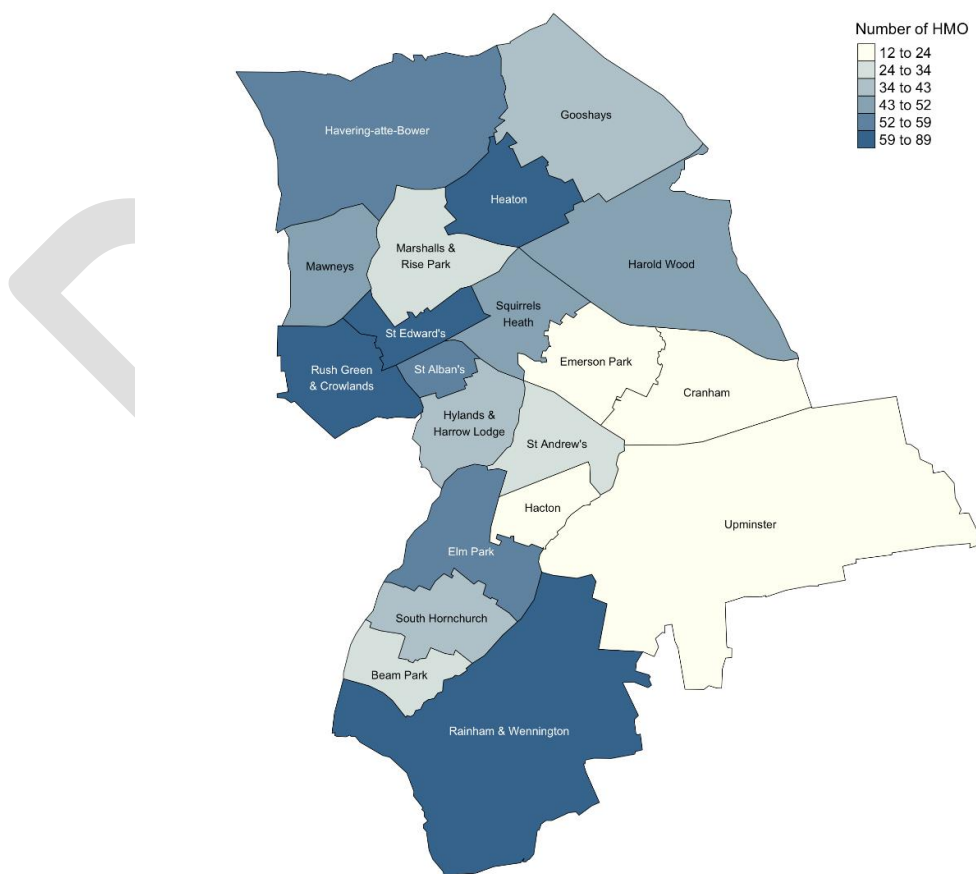


Figure 19: Distribution of shared HMOs (known and predicted) (Source Ti 2024, map by Metastreet)

To introduce an additional licensing scheme, the local authority must consider that a significant proportion of the HMOs in the area are being managed ineffectively, giving rise to, or likely to give rise to, one or more particular problems, either for those occupying the HMOs or for members of the public.

The evidence base demonstrates that the criteria for a borough-wide additional licensing scheme is met in that a significant proportion of the borough’s HMOs are being poorly managed and are giving rise, or are likely to give rise, to problems affecting their occupiers or members of the public.

Poor housing conditions are prevalent in Havering’s HMOs. The evidence shows that 426 HMOs in Havering are predicted to have serious hazards (Category 1 and high-scoring Category 2). This represents nearly 50% of all HMOs in Havering and is more than quadruple the national average of 10%.¹⁷ (Figure 20)

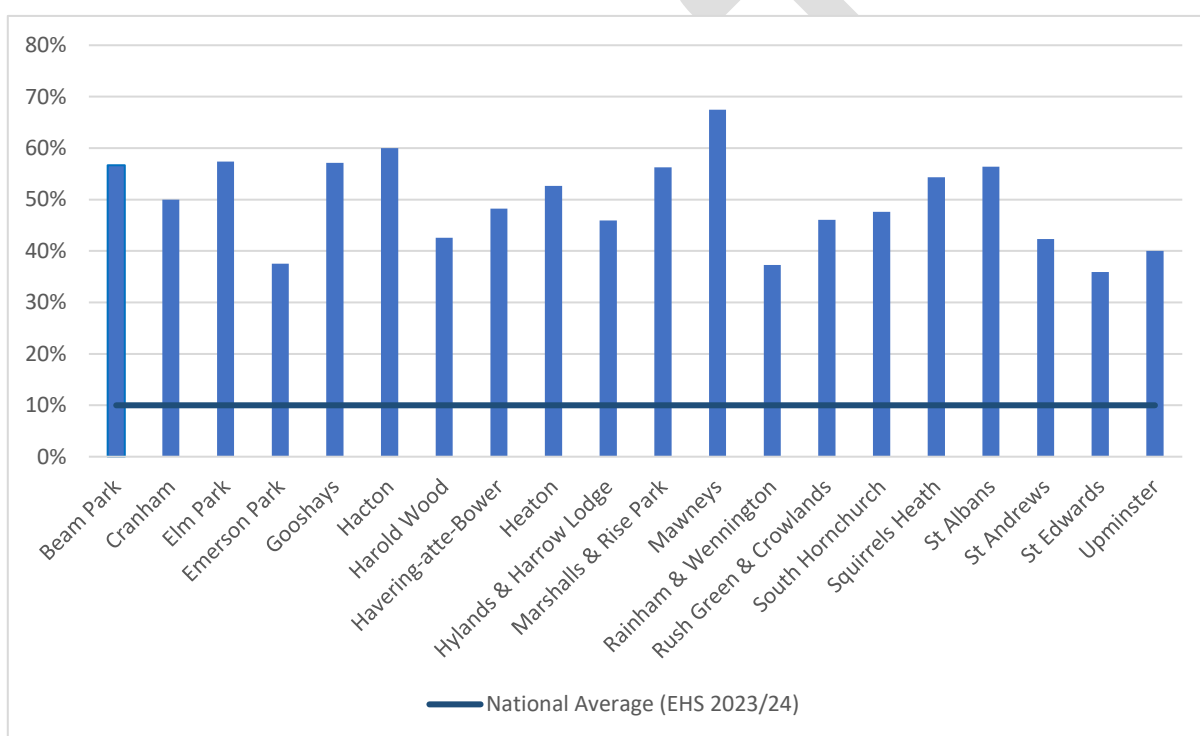


Figure 20. Predicted percentage of HMOs with serious hazards by ward (HSCR 2024)

Between 2021-2024 Council officers identified 1254 hazards (Category 1 & 2, HHSRS) during inspections of known HMOs. Therefore 43% of HMOs inspected were found to have at least 1 hazard (Category 1 & 2, HHSRS). Council officers identified the most hazards in HMOs in Heaton (257) and Havering-atte-Bower (115). (Figure 21)

¹⁷ [English Housing Survey 2023 to 2024: headline findings on demographics and household resilience. - GOV.UK](https://www.gov.uk/government/statistics/english-housing-survey-2023-to-2024-headline-findings-on-demographics-and-household-resilience)

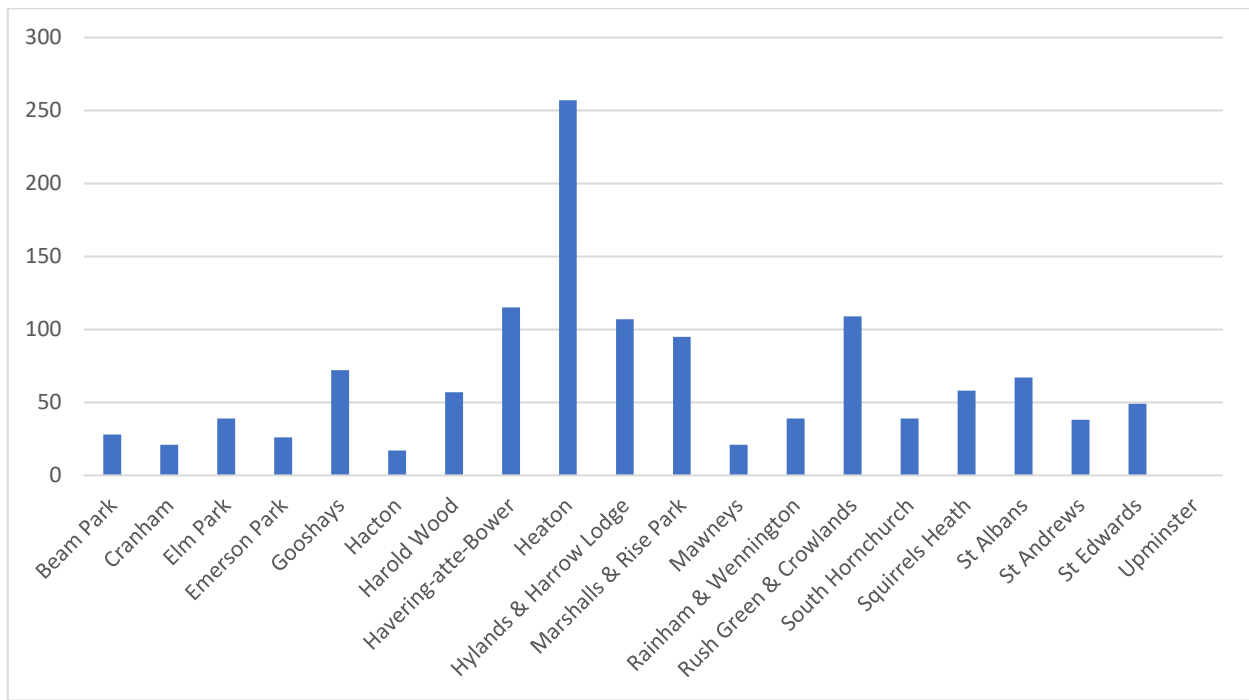


Figure 21. All hazards identified through inspections of HMOs by ward (HSCR 2024)

Complaints made by tenants and others to Havering Council about poor housing conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs. Between 2021- 2024, Havering received 240 complaints linked to HMOs distributed across all wards with Elm Park (29) and Mawneys (28) having the highest levels.(Figure 22)

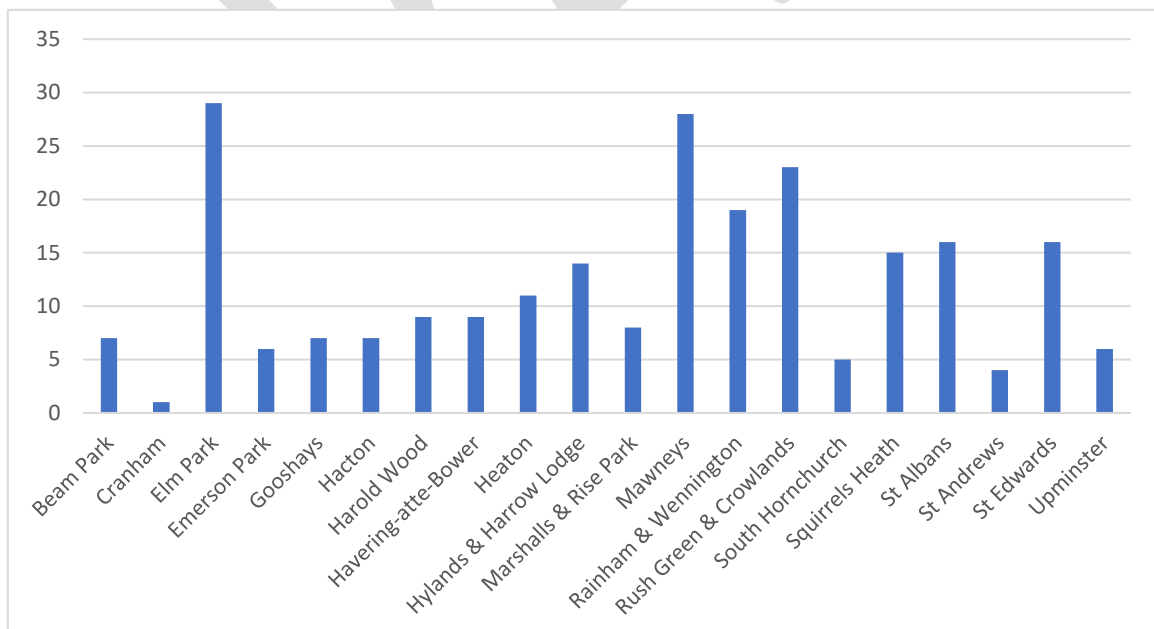


Figure 22: Complaints linked to HMOs by ward (HSCR 2024)

Responding to complaints in HMOs has required a significant number of Council interventions, representing a drain on Council resources. Between 2019-2024, the Council has issued HMOs with 167 housing and statutory housing and public health notices. St Albans (18) and Rush Green & Crowlands (16) required the most statutory notices on HMOs.(Figure 23)

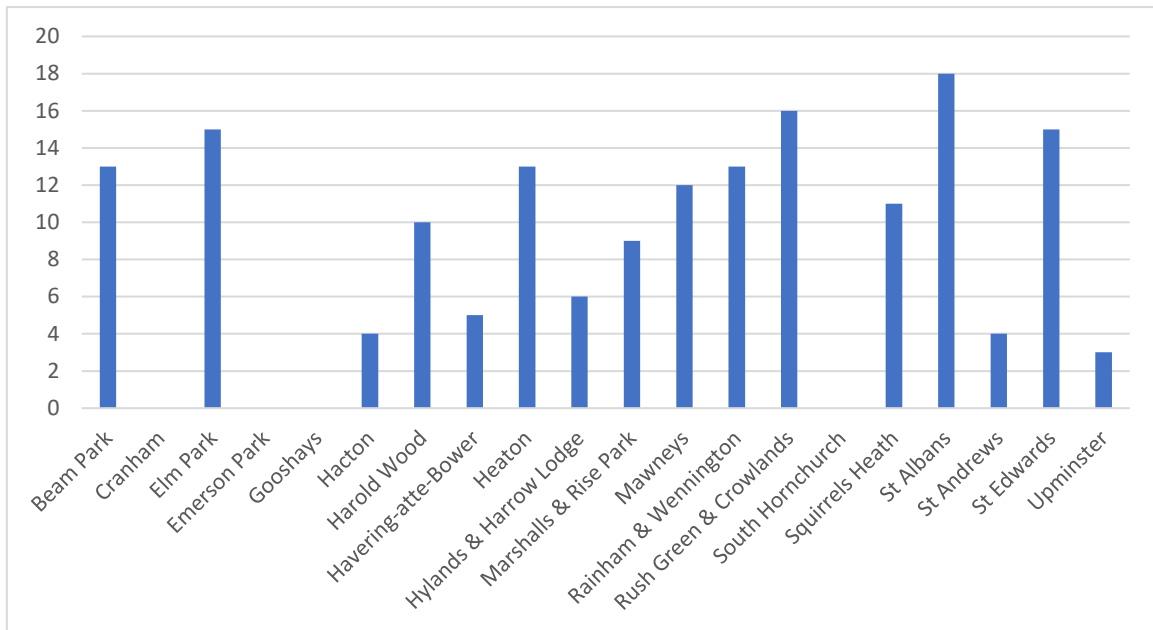


Figure 23. HMO statutory housing and public health notices served by ward (HSCR 2024)

7.3 Public perception on additional licensing scheme outcomes proposals

During the consultation on additional licensing, Havering Council asked respondents for their views on whether they thought an additional HMO licensing scheme in Havering would help to achieve the certain outcomes:

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree

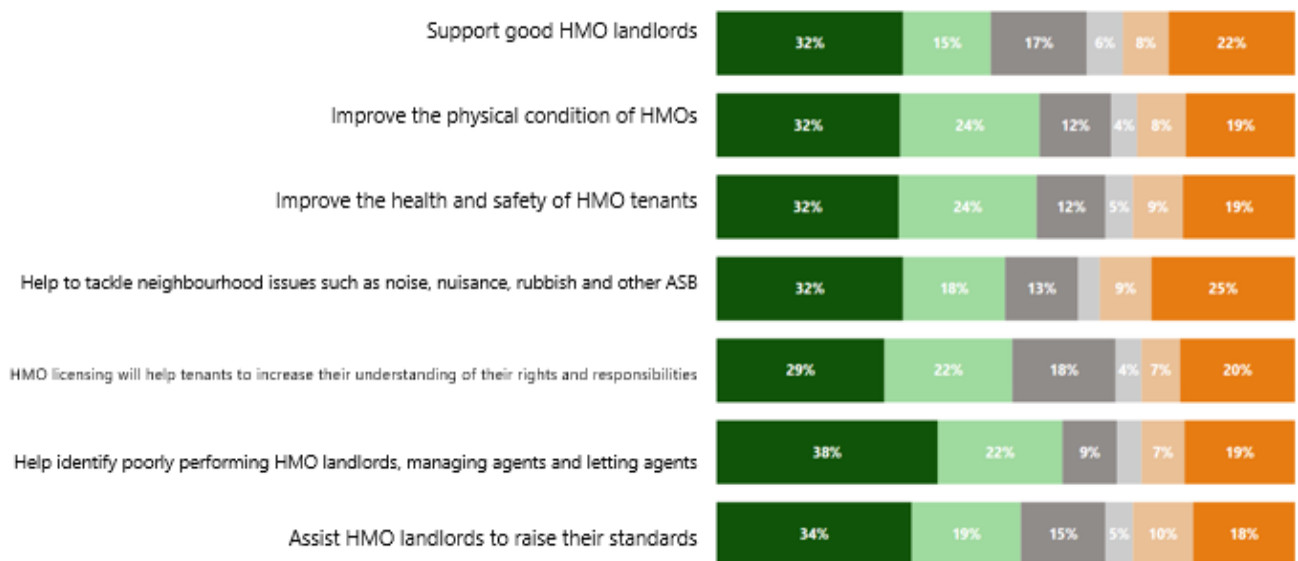


Figure 24: Respondents views on additional licensing scheme outcomes

Support good HMO landlords

A majority of respondents, **47** per cent, either agreed or strongly agreed, while **30** per cent either disagreed or strongly disagreed. **23** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of HMOs

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. Almost **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of HMO tenants

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **34** per cent either disagreed or strongly disagreed. **16** per cent said they neither agreed nor disagreed or didn't know.

Help tenants to increase their understanding of their rights and responsibilities when living in an HMO

The majority of respondents, **51** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. **22** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing HMO landlords, managing agents and letting agents

The majority of respondents, **60** per cent, either agreed or strongly agreed, while **26** per cent either disagreed or strongly disagreed. Nearly **14** per cent said they neither agreed nor disagreed or didn't know.

Assist HMO landlords to raise their standards

The majority of respondents, **53** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. Nearly **20** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is some polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders. However the consultation results indicate overall strong public support that the introduction of the additional HMO scheme will improve the condition, safety, and management of HMOs.

That making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, lead to a reduction in, or the elimination of, the problem.

7.4 How the council will use additional licensing to improve poor conditions and management standards in the area

The introduction of an additional licensing scheme will strengthen the Council's ability to regulate the condition and management of HMOs within the PRS. The Council will utilise the regulatory framework, as outlined in Section 6.13, to address poor housing conditions and improve management standards across HMOs in the borough.

This scheme will form part of a wider strategic approach to improving the PRS, ensuring that safe and decent housing is accessible to residents across a range of income levels, within a market that is well-regulated and offers appropriate protections to tenants. It will also support the Council's broader objectives in tackling homelessness, reducing the number of empty properties, and addressing anti-social behaviour associated with privately rented accommodation.

Through the additional licensing process, the Council will be able to:

- Identify and hold accountable those responsible for HMO property management;
- Enforce compliance with licence conditions;
- Take appropriate action where standards are not met.

The Council will expect property management issues identified during an inspection to be resolved within a reasonable period, depending on the severity of the issue, improvement notices, overcrowding notices and prohibition orders are formal notices that may be issued to bring about improvements in properties. Landlords who fail to license their properties could also receive a civil penalty or may be prosecuted.

In addition to enforcement, the Council will adopt a proactive approach to improving standards by supporting landlords and educating tenants. Landlords will be provided with guidance and access to resources to help them meet their legal obligations and implement best practice in property management. Tenants will be informed of their rights and responsibilities, empowering them to raise concerns and contribute to the upkeep and safety of their living environment.

All licences issued under the scheme will include the mandatory conditions set out in Schedule 4 of the Housing Act 2004. In addition, the Council will apply discretionary conditions deemed necessary to regulate the management, use, occupation, and physical condition of HMOs. The proposed discretionary conditions are detailed in Appendix 5.

The Council will employ a combination of informal and formal enforcement actions, including the service of statutory housing and public health notices, civil penalties, and prosecutions in the most serious cases. These actions will be aligned with other Council strategies to ensure a coordinated and effective response.

The designation of this scheme, alongside other measures in the area, will enable the Council to work as part of a multidisciplinary team with internal departments and external stakeholders—including the London Fire Brigade, Home Office, Police, HMRC, Justice for Tenants, Planning Enforcement, Community Safety, Social Services, Housing Needs, and Council Tax. This collaborative approach will allow the Council to identify areas and properties of concern and continue to drive improvements in housing standards and tenant outcomes across the borough.

8. Licensing and wider council strategies

The licensing proposals are set in the context of the council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB.

Licensing is part of the overall housing strategy

8.1 Havering Corporate Plan

Havering Council's Corporate Plan 2024-2027 focuses on three priorities:

- **People** - Supporting residents to stay safe and well: Aims to enhance health, support youth, and protect vulnerable groups by promoting preventive healthcare, mental health support, and improved care for at-risk children.
- **Place** - A great place to live, work and enjoy: Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability.
- **Resources** - Enabling a resident-focused and resilient Council: Emphasises digital transformation, better data use, and efficient resource management, including updating systems and enhancing service transparency.

A selective licensing scheme will contribute to the Council's priorities and assist in achieving its key ambitions and deliver better standards for private renters. Licensing schemes promote healthier, safer neighbourhoods, sustainability through energy efficiency standards, and equality by ensuring safe, healthy living conditions for all residents regardless of tenure.

8.2 Havering Housing Strategy

The Council is currently developing a new Housing Strategy. The draft strategy recognises there are many housing challenges facing Havering and seeks to address these challenges in the following way:

- Set out a plan to meet the diverse and evolving housing requirements of Havering informed by the latest data and projections.
- Focus is on the provision of new homes to keep up with the rising costs and affordability challenges of PRS.

The draft Housing Strategy identifies the need to provide better standards for private renters. Eliminating poor performing private sector landlords throughout the borough remains a priority, and the Council will seek to implement new licensing measures to drive improvements into this crucial part of the borough's housing offer.

The local authority has sought to adopt a co-ordinated approach with existing policies in connection with dealing with homelessness, empty properties, regeneration* and anti-social behaviour associated with PRS tenants, regarding both:

- combining licensing with other courses of action available to them, and***
- combining licensing with measures taken by others i.e., other organisations working in the area.***

****Applicable to selective licensing scheme only***

8.3 Preventing and resolving homelessness

Licensing is vital to preventing and resolving homelessness. Like many Councils, , Havering has a growing homelessness challenge and is under increasing pressure to find suitable temporary accommodation for families. There is also an inequity challenge, with a disproportionate rate of homeless families in temporary accommodation being from a Black and Multi Ethnic background¹⁸. In order to address the scale of the challenge surrounding homelessness the council will continue to deliver its [Prevention of Homelessness and Rough Sleeping Strategy](#) which comprehensively sets out Havering's approach, based around four objectives:

Objective 1: End long-term rough sleeping

Objective 2: Reducing the number of people in temporary accommodation

Objective 3: Supporting people who become homeless

Objective 4: Provide good value, integrated services that deliver excellent customer care.

The Council recognises the vital role of the private rented sector in providing a wider housing offer for Havering's residents. Through the implementation of private property licensing schemes, the Council will be able to ensure improved conditions and management standards in private rented housing. Licensing schemes will also enable us to offer greater protection to tenants in the private rented sector. In collaboration with partner agencies, we shall work to reduce the prospect of unlawful evictions, which in turn will help to both avoid and reduce homelessness in the borough.

Through property licensing, vulnerable residents who may be at risk of homelessness may be identified and referred to the Housing Advice Team, who will work with tenants to keep them in their current accommodation or help them find alternative housing. Tenants at risk will also be signposted to the Council's webpages which provides comprehensive guidance for those facing the threat of [homelessness](#).

In addition, by working with landlords to improve their professionalism and understanding of their legal obligations, and by educating tenants education about their rights and responsibilities, the Council is able to support the sustainment of tenancies in the PRS and contribute to reducing homelessness in the borough.

8.4 Identifying and tackling empty properties

As part of the draft Housing Strategy, the Council have made a commitment to making better use of existing homes. The Council recognises that empty properties are a wasted resource for both the community and the owner and can cause a variety of issues such as reducing the supply of housing and attracting ASB. Bringing empty properties back into use is a priority for the Council

¹⁸ [The fight for home is a fight against racism - Shelter England](#)

and clamping down on those landlords that keep homes empty for years on end is a key step to increasing the supply and availability of affordable homes in the borough.

Empty properties attract nuisance and ASB, so work done to bring empty properties up to standard and back into use as liveable homes is complimentary to the objectives of property licensing and other Council strategies such as homelessness and ASB reduction

8.5 Reducing Anti-Social Behaviour in the PRS

As outlined in the Havering Corporate Plan 2024 – 27, the Council are committed to working with tenants, residents and external partners to ensure that steps are taken to tackle ASB. The borough's Corporate Plan vision is one where Havering is 'A great place to live, work and enjoy' and where the Council 'Seeks to improve public safety, provide affordable housing, and maintain public spaces, focusing on safety initiatives and environmental sustainability'.

The property licensing designations are vital in supporting the Council's multi-agency approach to tackling and reducing ASB by obliging landlords and property managers to be proactive in dealing with any ASB arising in their properties

To tackle ASB problems, we have made it conditional on all private landlords who hold licences under the additional HMO or selective licensing schemes to prevent and combat ASB associated with properties they manage. Section 57(5) of the Housing Act 2004 gives a definition of ASB for the purposes of licensing under Parts 2 and 3 of the Act.

Additional and Selective Licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.

8.6 Supporting regeneration goals

Havering Council has developed a comprehensive regeneration strategy aimed at transforming various areas within the borough to enhance community living, infrastructure, and economic vitality. Key components of the regeneration programme include:

- building modern, energy-efficient homes and well-connected neighbourhoods that are right for our borough
- providing new, high quality Council housing and increasing the amount of family-sized homes
- providing infrastructure to support new homes
- increasing opportunities for home ownership for Havering residents
- supporting healthy communities, fit for future generations
- supporting and investing in our local economy to create a thriving place
- protecting and celebrating our history and heritage
- The Council are also committed to improving the existing housing stock in the borough.

Private property licensing schemes will act as a regulatory tool to ensure that landlords in regenerating areas maintain high property standards, supporting regeneration goals of creating more sustainable, inclusive, and well-maintained communities.

9. Licensing and other measures and initiatives

Combining licensing with other courses of action available to them

The Council will continue to use a multi-agency approach and will continue to use Part 1 of the Act, and all other public health and housing legislative powers available in conjunction with selective licensing.

9.1 Working with and supporting good landlords and agents

The Council understands the vital role that private landlords play and provide several services to support landlords in meeting their obligation to provide good quality rental accommodation for their tenants. This includes the following:

- Dedicated navigation page for [private sector landlords](#) – This provides information and advice on;
 - Applying for a landlord licence
 - Landlord accreditation scheme
 - Gas safety certificates
 - Carbon monoxide and smoke alarms
 - Schemes on offer for private sector landlords
 - Benefit information for landlords
 - Bulky waste removal from your rental property
 - Tenant and landlord disputes
- Landlord Forum – Landlord forums are free to attend and held periodically. They provide an opportunity for landlords, agents and property professionals to keep ahead with the latest developments in local and national updates relating to private rental standards and for landlords and agents to share experiences of renting accommodation in Havering.

9.2 Supporting private rented sector tenants

The Council provides help and support to tenants living in private rented accommodation including the following:

- **Online support** - Comprehensive information is available to tenants on the Council's dedicated [webpages](#) which provides information on:
 - Why rent privately?
 - Private rented tenancies
 - Rent arrears prevention
 - Evictions
 - Tenant and landlord disputes
 - Intermediate rent
 - Rent to buy

9.3 Combining licensing with measures taken by others local organisations in the area

Selective Licensing is not a solution, but a key tool to be used with other initiatives and partnerships to tackle issues affecting the PRS. There are a range of partnerships and collaborations that need to be working effectively to support these designations of selective licensing in the applicable areas.

Havering Council will continue to build on the good working relationship with their internal and external partners that has been established as part of the licensing schemes to date, and business as usual private sector enforcement.

The Private Sector Housing team works collaboratively with partner organisations and neighbouring local authorities to support vulnerable tenants, combat rogue and criminal operators and to create a safer and better community for its residents. Key partners include the London Fire Brigade, with whom the team take a coordinated approach to tackling problematic properties, and the Metropolitan Police, where criminal activities such as modern-day slavery are identified. Officers also work closely with resident associations, providing support in cases where building managers are neglecting repair responsibilities.

The council has been working in partnership with Safer Renting, an organisation that helps to prevent homelessness, by intervening in tenant harassment and illegal evictions. Over the past four years, the council have also referred tenants to our partner organisation, Justice for Tenants, to help Havering renters navigate the complex legal process of obtaining Rent Repayment Orders (RROs) against their landlords. The Private Housing Team has subsequently provided evidence in support of several cases, resulting in successful RRO settlements.

With the aim of seeking to assist landlords and improve the PRS, the council will also continue to actively promote Landlord Accreditation Schemes including the London Landlord Accreditation Scheme (LLAS) and provide discounts to accredited landlords.

Working in partnership to help identify and disrupt modern slavery and human trafficking

The implementation of selective and additional licensing schemes in an area, complemented by routine monitoring of properties and proactive campaigns to uncover unlicensed properties not only ensures property standards are improved but also aids in identifying and addressing other potential issues in the designated area.

There is an intrinsic link between slavery and housing; not all rogue housing will involve slavery, but virtually all cases of slavery will involve some form of substandard housing. Cases of slavery have been discovered when councils have investigated noise complaints or reports of 'beds in sheds'; therefore, regulation of private rented sector housing, including licensing schemes, can and has been used effectively to disrupt slavery¹⁹.

In its most recent statement on Modern Slavery, the Council states it is committed to working collaboratively with all relevant organisations across all sectors to support the residents of Havering, who have been affected by Modern Slavery. The Council also works closely with neighbouring boroughs, and the Care Quality Commission (CQC) sharing intelligence and reciprocating with boroughs²⁰.

¹⁹ [Councillor guide to tackling modern slavery](#)

²⁰ [Havering Modern Slavery Statement 2025](#)

Expanding property licensing to cover a wider section of the private rented sector would strengthen the Council's ability to proactively gather intelligence, monitor housing conditions, and respond more swiftly to concerns around exploitation, safety, and wellbeing. The new Additional and Selective licensing schemes will provide the Council with an essential tool for improving housing standards and supporting vulnerable residents across the borough.

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10. Alternatives to licensing that have been considered

Before pursuing selective and additional licensing scheme proposals, Havering council gave consideration to a wide range of actions that may have been effective in tackling poor housing conditions and raising management standards in the PRS. The Private Sector Housing team have considered other courses of action, or alternatives, to the property licensing proposals, but do not believe that, individually or collectively, they provide an effective, or as effective means of tackling poor housing conditions and poor management standards in the borough. Table 5 shows the alternatives that the council have considered and explains why they are not sufficient to meet our objectives.

| Alternative Measure | Strengths | Weaknesses |
|---|---|--|
| Do nothing | N/A | Evidence has shown that the areas proposed for selective and additional licensing are subject to conditions that require intervention. In line with the Council Plan commitments, and the need to ensure the PRS is properly managed and regulated, the option of doing nothing is not an option. If no action is taken the problems experienced in the relevant wards and across the borough are likely to continue. |
| Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers | <p>Following an investigation, formal statutory notices can be served that require improvements to be carried out to a property.</p> <p>Councils can carry out work in default if a notice is not complied with.</p> <p>Landlords risk being prosecuted if they do not comply with the notice, or the Council can impose a civil penalty on the person responsible.</p> | <p>The powers do not place any obligation on landlords to be proactive in improving conditions. Formal action is generally slow, with appeal provisions against most types of notices served, which can significantly delay the time period for compliance.</p> <p>Work in default can be effective, but it is expensive and time-consuming to the Council, with the risk that not all costs are recovered.</p> <p>Successful prosecutions and civil penalties do not in themselves secure improvements in property conditions and the Council's costs in pursuing legal action are often not met in full.</p> |
| Rely on prosecutions and civil penalties for housing offences | Provides landlords with a disincentive to | These powers do not place any obligation on landlords to be proactive in improving conditions. Successful |

| Alternative Measure | Strengths | Weaknesses |
|---|--|--|
| | keep properties in poor conditions. | prosecutions, or the imposition of civil penalties, do not in themselves secure improvements in property conditions. The absence of licensing significantly reduces the scope of the Council to impose civil penalties in respect of identified housing breaches. |
| Wider promotion of voluntary accreditation schemes to facilitate improvement in management practices and standards | For those landlords who take part, accreditation can increase their knowledge and competence and their ability to effectively manage a property. | This requires voluntary landlord engagement, and rogue operators are unlikely to attend/engage in such schemes. |
| Improvement grants to improve sub-standard properties | Grants subsidise improvement works, improving standards and giving benefits for landlords and tenants. | Generally, there are few grants available, and the Council has very limited scope to offer grants through successful external funding bids. In the most part, grant awards would fund improvements that the landlord should be carrying out to meet their legal obligations. Any grant scheme would be discretionary and would rely on voluntary landlord engagement. |
| ASB powers | Formal notices can be served at addresses identified as having ASB issues. This can resolve ASB at the particular address. | Action would generally be taken against the tenant in occupation. The powers do not place any obligations on landlords to be proactive in managing their properties to prevent or reduce the likelihood of ASB occurring. |
| Renters Rights Bill (Introduced to Parliament September 2024) | Will give the Council greater enforcement and investigatory powers. | Does not put in place a proactive approach to housing standards and still relies on tenants complaining and landlords being upfront about issues. |

Table 5: The alternatives to licensing that have been considered by the Council

Each of the above powers or measures support the Council in achieving the objectives of selective and additional licensing, but none of them, either individually or collectively, can achieve the objectives that Havering intends to deliver through the proposed licensing schemes.

11. Licensing Scheme Objectives

Licensing is a crucial part of the council's comprehensive strategy to improve the PRS and deliver better standards for private renters. The council has implemented a range of initiatives and methods to achieve this goal, and licensing is one of them. Selective and additional licensing schemes would place the responsibility on landlords to inform the council that their property is licensable and to ensure that they meet the required standards with the council's support. The council can then prioritise its resources effectively to deal with the properties of most concern and target enforcement actions to those landlords who fail to license their properties and/or breach licence conditions.

Property licensing gives the Council the capability, through significantly increased staffing resources, to undertake a large programme of proactive audit inspections and greater opportunities to work with both internal and external partners to bring about the improvements that are necessary. Havering Council has seen through their existing licensing schemes that such interventions enable them to detect and tackle hazards much more effectively. However, further work needs to be done in educating those landlords outside of existing licensing regimes in improving the management of their properties.

The council propose to use licensing to improve the standard of property management in the PRS, to ensure that PRS properties meet minimum health and safety standards and to keep their residents safe.

The council have identified a number of key scheme objectives (Table 6), which they are committed to meeting over the life of an approved schemes. Outcomes will be reviewed and details published on the council's website, in line with the best practice guidance included in the General Approval.

| Objective | Performance Indicator | Outcome |
|--|---|---|
| 1. Improve housing conditions in the PRS by eliminating poor property standards | <ul style="list-style-type: none"> • 100% of all licence applications desk-based risk assessed • 70% of all selective licensed properties and 100% of all HMO licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • At least 75% of licensable properties licensed over 5 years • All Category 1 and high scoring category 2 hazards mitigated where statutory notice has been served. | <ul style="list-style-type: none"> • Licensed properties are monitored, and licence conditions robustly enforced and complied with • Poor Housing Conditions are improved with category 1 & high scoring category 2 hazards resolved (including issues such as damp and mould) • Improved health, safety and welfare of tenants in the PRS • The Council will gain increased knowledge of the private rented sector in the borough. This will enable targeted enforcement and support for landlords |

| | | | |
|----|--|--|--|
| 2. | Improve management standards in PRS properties | <ul style="list-style-type: none"> • 70% of all selective licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • 100% of all HMO licensed properties inspected at least once during the duration of the licence, informed by a data-led risk assessment • Take appropriate enforcement action against those landlords who fail to license or breach licence conditions • 2 landlord forums per annum | <ul style="list-style-type: none"> • Landlords actively manage their properties or be enforced against • Absentee or unfit landlords employ an agent to actively manage their properties to ensure compliance • Prevention of overcrowding through better management of property occupancy • Greater number of landlords become accredited improving the professionalism of landlords in the PRS • Engagement with landlords improved • Landlords are kept informed of latest legislation and good practice • Responsible landlords will become more involved in Council licensing schemes and receive information and support • Irresponsible landlords will be forced to improve their properties or be enforced against |
| 3. | Increased awareness for tenants of the minimum standards to be expected in rented accommodation and what their other rights are when renting in the PRS | <ul style="list-style-type: none"> • Deliver an education campaign to make renters aware of licensing, tenancy rights and responsibilities and services available • Work with third parties to provide additional advice and support with tenancy rights • Tenant Forums to be set up, learning from experience of other Councils | <ul style="list-style-type: none"> • Information for tenants on the local licensing scheme advertised and third-party support for tenants made available • Dedicated tenants' advice section created on web site • Officers to provide tenants with information and sign posting to support their housing and wider needs • Improved tenants' support through work with third parties. • Renters know their rights and responsibilities and have greater awareness of and access to Council services that can support them • Tenants will see economic benefits such as reduced heating costs, bringing them out of fuel poverty |

Table 6: Council objectives, expected outcomes and targets in relation to PRS licensing

12. Compliance and Enforcement

To achieve the council's objectives, the selective and additional licensing schemes will need robust enforcement plans to ensure compliance, and therefore realising the positive outcomes detailed above.

12.1 Compliance with existing schemes

In addition to the national mandatory HMO licensing scheme, in 2018 Havering implemented an additional HMO licensing scheme in 12 wards and in 2021 a second additional HMO licensing scheme in a further 6 wards. Also, in 2021 Havering introduced a selective licensing scheme (in two wards, which became three wards following boundary changes) to improve safety standards for tenants living in the PRS.

The selective licensing scheme was implemented in the wards of Brooklands and Romford Town, which because of the boundary ward changes in May 2022 became three wards (Rush Green and Crowlands, St Alban's & St Edward's) and applies to properties rented to an individual, a single family or two unrelated sharers.

The Council implemented a robust inspection and enforcement regime, that has ensured that licences are applied for, valid applications processed and there is compliance with the conditions of licences issued.

Nearly 250 properties were licensed under the additional HMO scheme and 3,627 under the selective licensing pilot scheme.

| Licence type | Licences granted |
|--------------------------|------------------|
| Mandatory | 386 |
| Additional | 241 |
| Selective (pilot) | 3,627 |
| TOTAL | 4,254 |

Table 7: Licence figures for licensing schemes in Havering

Through the licensing schemes, the council has been able to improve basic standards, often in the most dangerous housing at the bottom end of the housing market, where some of the most vulnerable people in society live. Licences have conditions attached which must be complied with, allowing the council to regulate the PRS, improve housing conditions, and foster better management standards.

All licence applications receive a desk-based risk assessment. This has enabled the council to impose a level of 'self-regulation' in the PRS, as landlords will not be granted a licence unless they are able to demonstrate at the time of application that they are a 'fit and proper' person to be the licence holder and also that the property complies with fire, gas and electrical safety conditions.

As part of the licensing process properties are risk assessed and prioritised for compliance inspections. Properties identified as high risk will be inspected before a licence is granted, ensuring that potential issues are addressed promptly. Additionally, the council leverages intelligence gathered from the licensing database to identify applications that have been initiated but remain incomplete. This strategic approach forms the basis for tasking days, during which these properties are visited to verify their licensing status and action taken to ensure where appropriate licence applications are completed and submitted.

In the last 12 months over 360 inspections have been undertaken using an intelligence-driven approach. Licensing requires landlords to proactively manage their properties and take reasonable action to rectify any identified problems to ensure compliance with licence conditions. The Private Sector Housing team have employed a range of enforcement tools at their disposal, including issuing statutory notices, such as improvement notices, notices relating to civil penalties and prohibition orders, encompassing the full scope of Housing and Environmental Health legislation. This has resulted in much-needed improvements and raised the standards of poor accommodation across the borough, benefiting many tenants.

12.2 Measures to ensure compliance with the new scheme

Administration of licences

During the additional HMO and selective licensing schemes, Havering had a team of officers engaged in assessing, processing, and issuing licences in the borough. This enabled Havering to build an experienced licensing team and streamline processes for the administration of licences and the inspection of properties. Havering has a fully integrated online application form with online payment system that is fully integrated with its case management system.

The Council recognises the importance of ensuring that all applications are processed and decisions on whether to grant or refuse a licence are made within a reasonable period of time. Management processes are in place, including the use of IT dashboards and performance reports enabling progress to be effectively monitored and managed. During the lifetime of the two additional licensing schemes and the selective licensing scheme, Havering has processed in the region of 4500 licence applications. On receipt of a complete application and appropriate fee, the applicant and all interested parties are notified whether they propose to grant or refuse a licence. This is followed by a 21-day consultation period which gives the applicant, and all interested parties the chance to make representations. At the end of the consultation period the licence will be granted, ensuring that part B payments are collected without significant delay. The median average time taken from receiving an application to issuing a full licence is approximately 4 months.

The Council will ensure that it is adequately resourced to maintain this level of service. To manage the influx of applications generated by the introduction of the new licensing schemes, it is the Council's intention to recruit additional processing officers, should the scheme be approved at Cabinet.

Monitoring compliance

Lessons learnt from existing licensing schemes will be used to shape the Council's overall approach to ensuring compliance is achieved in any new designation. Several robust methods are

already in place and Havering Council will continue to use these methods to ensure that landlords comply both in terms of becoming licensed and complying with their licence conditions in accordance with the Council's enforcement plan.

Measures that are in place to monitor compliance include:

- Dashboards have been set up to monitor all applications received, at a ward and street level providing detailed, real-time insights into application trends and statuses. This allows for efficient tracking and management of applications, ensuring that any issues or non-compliance can be quickly identified and addressed.
- Using land registry and deposit protection scheme data to target unlicensed properties in the designated areas. Applications received will be monitored against this database to detect streets/areas with low application rates.
- On receipt of application, properties/applications are risk assessed. Those properties with the highest risk factors are prioritised for inspection.
- The reporting of unlicensed properties by members of the public, visiting professionals and tenants is actively encouraged via various communication methods. This is complemented with an online tool that allows for the easy recognition of unlicensed properties and online reporting for those that are found not to be licensed.

Steps to encourage compliance

To encourage compliance with the new scheme, Havering will also implement the following measures:

- Regular Messaging Reviews - collaborating with corporate communications to continuously review and update messaging.
- Public Posters - displaying posters in public buildings to inform landlords and tenants about the scheme and encourage applications.
- Mail Shots to Agents – sending targeted mail shots to managing and letting agents to inform their client base.
- Targeted Letters - sending letters to designated areas, especially high-risk streets, urging tenants to check if their property is licensed and to inform their landlord or the council.
- Digital Communications - using digital channels to reach both in-borough and out-of-borough landlords. This was particularly successful at reaching both types of landlords during the consultation and will be used again to highlight the scheme requirements and promote successful enforcement outcomes such as prosecutions and civil penalties.



12.3 Measures that will be in place where there is non-compliance

The Council will use intelligence gathered via licence applications and service requests, to target enforcement action towards the minority of landlords who fail to invest in their properties or meet their legal obligations.

The Private Sector Housing Enforcement Policy, provides details on how the enforcement tools provided by the Housing Act 2004 and the Housing and Planning Act 2016, will be used fairly and consistently to achieve improvements in housing, health and the environment in the Borough. In accordance with the enforcement policy an opportunity will be given to landlords to be self-

regulating, wherever possible and to put things right when things go wrong. The Council will therefore focus its enforcement activity where this self-regulation fails.

Once an audit or inspection has led to the identification of non-compliance with licence conditions, the Council offer advice or a warning in the first instance, but only if the breach is not so serious as to require immediate enforcement action to address high risk or very harmful situations. However, if there is a history of non-compliance, a persistent breach, or low confidence of compliance, the Council will not hesitate in taking robust enforcement action using all enforcement powers available, including notices, prohibition orders, emergency remedial action (ERA), financial penalties, legal action (such as banning orders), and prosecution.

Where the Council is unable to grant or revoke a licence, the Council may use its powers to make an Interim Management Order to take over the management of the property. Additionally, for any period where an unlicensed property is found to be rented, the Council may use its powers to make an application for a Rent Repayment Order limited for up to 12 months while the offence is being committed. The details of all landlords who have been prosecuted shall be publicised on the London Rogue Landlord and Agent database.

Whilst the licensing schemes to date have enabled the Council to begin to make real progress in raising standards in the private rented sector, the evidence is that there is still much more to do. Table 8 below summarises the Councils' enforcement outcomes that have been achieved through its existing licensing schemes and the measures in place to tackle non-compliance.

| Activity | Number |
|-----------------------------------|--------|
| Statutory Notices served | 866 |
| Prosecutions | 5 |
| Civil Penalties Intentions/Finals | 55 |

Table 8: Enforcement action for non-compliance (2020 - 2025)

Through the administration and enforcement of the licensing schemes, the Council has also been able to place greater onus and responsibility on licence holders to prevent ASB in their rented homes, to investigate any reported ASB incidents and to take appropriate action to address any evidenced issues.

In recent research published in BMJ Open, researchers from the School for Public Health Research have found that the licensing of private rented housing in London is associated with less ASB and with less calls being made regarding ASB concerns²¹.

The council has collaborated with multi-agency partners, including the fire service, police, Community Safety team, and Planning Enforcement teams to address various issues. As demonstrated by case study 2 earlier in the report. This collaborative approach has proven effective in enhancing community safety and improving property conditions.

²¹ Impact of selective licensing schemes for private rental housing on mental health and social outcomes in Greater London, England: a natural experiment study Petersen J, et al. BMJ Open 2022

As demonstrated above, the licensing schemes have enabled the Council to make a real and notable difference in driving up improvements for Havering's most vulnerable. The tragic death of Awaab Ishak demonstrates the need to focus our attention on relentlessly addressing standards through robust enforcement measures.

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13. Consultation

Sections 56(3) and 80(9) of the Housing Act 2004 requires that when considering designating an additional or selective licensing area the local housing authority must take reasonable steps to consult persons who are likely to be affected by the designation, and consider any representations made in accordance with the consultation and not withdrawn.

Havering Council undertook an extensive public consultation, widely publicised using various channels of communication, for 12-weeks between 14 April 2025 and 6 July 2025. The consultation sought views from all those that are likely to be affected by the proposed schemes both within and outside of the borough, including residents, private tenants, private landlords, letting agents, managing agents, businesses, and other stakeholders.

13.1 Consultation methods

The consultation used the following methods and was promoted through the council's communications channels and local and regional media:

| Consultation Method | Response |
|------------------------|--|
| Online survey | An open access online survey (incorporating both a quantitative approach and qualitative responses through free text boxes) which received a total of 403 responses. |
| Public forums | Two virtual public forums were held for landlords, residents and other stakeholders and attended by 143 people. |
| Other written feedback | The council accepted feedback on the proposed licensing schemes by email or written response. Responses were received from three stakeholder organisations. |

Table 9: Summary of methods used for consultation on selective licensing

A dedicated phone and e-mail address were also available to residents, landlords and other stakeholders to ask questions about the proposals and consultation or receive help to respond to the consultation. 31 emails were received and responded to during the consultation period.

13.2 Communication channels

The council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals. Various activities were undertaken to engage all stakeholder groups, both within and outside the borough. Key activities included:

- Updating the council website homepage with a news article and a link to the consultation on 14 April and 4 July 2025
- A press release to announce the start of the consultation was published on 14 April 2025
- A press release to announce the consultation would soon close was published on 4 July 2025
- The press release was linked to relevant housing web pages

- Approximately 300 leaflets were distributed at food banks and children centres
- A direct email was sent to 16 faith groups
- A direct email was sent to key stakeholders including all London councils, neighbouring borough councils, landlord accreditation and membership organisations, housing charities, emergency service commanders and integrated care boards on 24 June 2025.

13.3 Reaching the digitally excluded

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Posters and leaflets were sent to the following foodbanks

- Collier Row and Romford
- Harold Hill
- Rainham

Paper copies of the consultation were available at the following locations within the borough from 14 April 2025:

- Collier Row Library
- Elm Park Library
- Gidea Park Library
- Harold Hill Library
- Harold Wood Library
- Hornchurch Library
- Rainham Library
- Romford Library
- South Hornchurch Library
- Upminster Library.

Reaching out to local community and outreach groups to ask them to share the consultation with the groups they interact with via the Live Well Havering Network and sharing with the following organisations:

- Collier Row Children's Centre
- Elm Park Children's Centre
- Ingrebourne Children's Centre
- Rainham Village Children's Centre
- St Kilda Children's Centre
- Acorn Specialist Children's Centre
- Avelon Road Centre
- Yew Tree Resource Centre

- Collier Row and Romford Foodbank
- Harold Hill Foodbank
- Rainham Foodbank

The following organisations were included on the press release distribution list:

- Generation Rent
- Justice for Tenants
- Flat Justice
- Cambridge House
- Age UK Redbridge, Barking & Havering
- Reform
- Crisis
- Forward Trust
- Shelter
- Renters Rights London
- Refugee Council
- Central YMCA
- Citizens Advice Havering

13.4 Reaching out-of-borough landlords

Additional effort, was also made to ensure that landlords who are resident outside the borough were also advised of the consultation exercise, activities included:

- An out of home campaign with adverts added to Global, Clear Channel and JC Decaux media sites displayed in the neighbouring boroughs of Bexley, Barking & Dagenham, Epping, Brentwood, Thurrock and 24 bus routes leaving Dartford Bus garage.
- Details of the consultation was sent via direct emails to all Leader's offices, Chief Executives, Regulatory and Housing services at all London borough Councils
- A thorough digital marketing campaign was also undertaken which targeted landlords living outside the borough.

13.5 Consultation results

The consultation reached a good representative section of those who may be affected by the designation, with a total of 403 responses to the consultation survey being received.

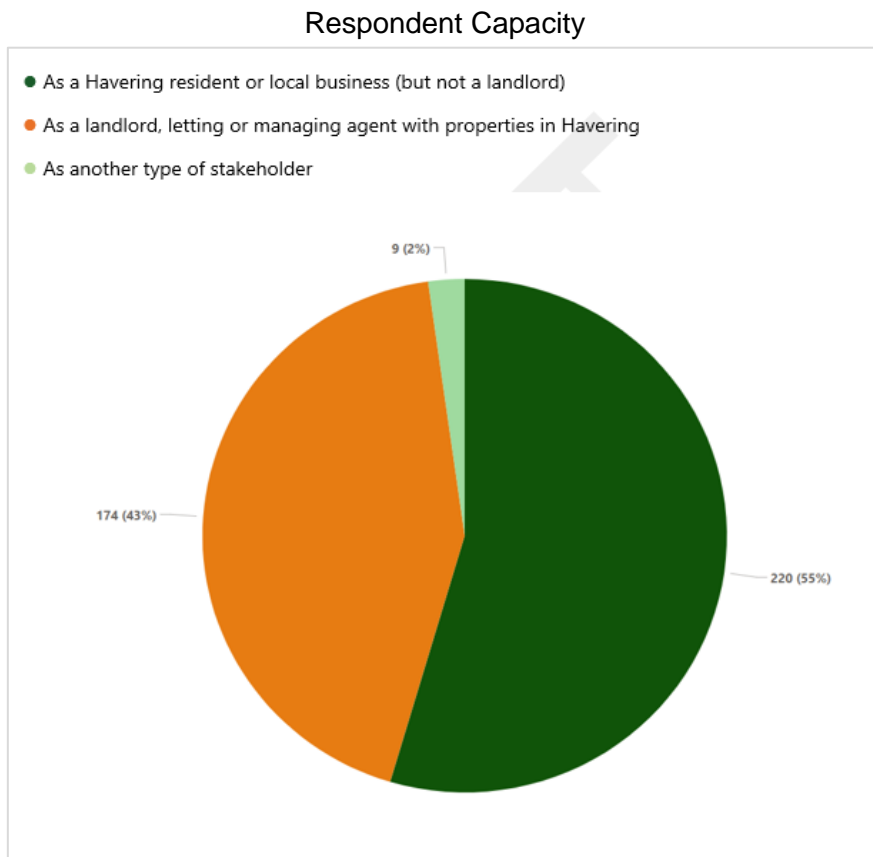


Figure 25: Level of engagement of landlords and agents versus residents (including private tenants) or business

Landlords, letting or managing agents who responded to the consultation were asked if they lived in Havering. Of the **174** landlords, letting or managing agents who responded to this question, **94 (54 per cent)** said they lived in Havering, and **80 (46 per cent)** said they lived outside of Havering. The survey responses confirm that the consultation reached landlords living outside the borough as well as those resident in Havering.

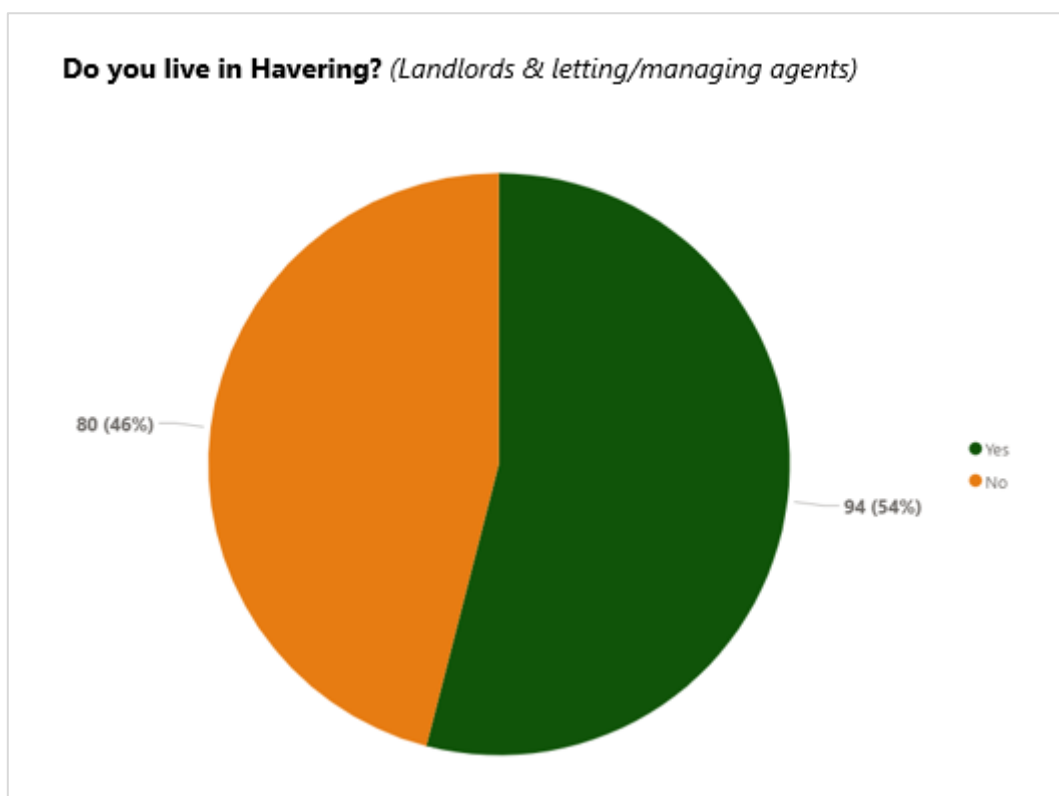


Figure 26: Location of landlords/agents (in or out of the borough)

Key consultation findings

The consultation looked at the level of support for introducing an additional HMO and a selective licensing scheme and sought views on the proposed licence conditions, associated fees, potential discounts, scheme objectives and the respondents' perceptions of the issues of poor property conditions anti-social behaviour (ASB) in the borough. The results are summarised in Table 10 below. The table does not show the 'don't know/neither agree nor disagree' categories, therefore the percentages do not total 100%.

| Selective Overall | | Landlords, letting or managing agents | Residents (including private tenants) and businesses | Other stakeholders |
|--|----------------------|---------------------------------------|--|--------------------|
| Total consultation survey responses | 403 responses | 174 responses | 220 responses | 9 responses |
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Agree with selective licensing proposal | 41% | 11% | 63% | 78% |

| | | | | |
|---|------------|-----|-----|-----|
| Disagree with selective licensing proposal | 47% | 75% | 27% | 11% |
|---|------------|-----|-----|-----|

| | | | | |
|--|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Agree with proposed selective licensing conditions | 44% | 12% | 67% | 67% |
| Disagree with proposed selective licensing conditions | 38% | 62% | 20% | 0% |

| | | | | |
|---|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Selective licensing fee is about right | 21% | 4% | 33% | 44% |
| Selective licensing fee is too low | 18% | 0% | 32% | 11% |
| Selective licensing fee is too high | 52% | 93% | 20% | 22% |

| Additional HMO Overall | | Landlords, letting or managing agents | Residents (including private tenants) and business | Other stakeholders |
|--|----------------------|--|---|---------------------------|
| Total consultation survey responses | 403 responses | 174 responses | 220 responses | 9 responses |

| | | | | |
|--|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Agree with additional HMO licensing proposal | 59% | 45% | 69% | 89% |
| Disagree with additional HMO licensing proposal | 31% | 36% | 28% | 0% |

| | | | | |
|--|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Agree with proposed additional HMO licensing conditions | 47% | 24% | 65% | 78% |
| Disagree with proposed | 26% | 32% | 21% | 0% |

| | | | | |
|--|--|--|--|--|
| additional HMO licensing conditions | | | | |
|--|--|--|--|--|

| | | | | |
|--|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Additional HMO licensing fee is about right | 21% | 10% | 29% | 56% |
| Additional HMO licensing fee is too low | 22% | 4% | 36% | 11% |
| Additional HMO licensing fee is too high | 45% | 76% | 21% | 11% |

| Scheme Objectives | | Landlords, letting or managing agents | Residents (including private tenants) and business | Other stakeholders |
|--|----------------------|--|---|---------------------------|
| Total consultation survey responses | 403 responses | 174 responses | 220 responses | 9 responses |

| | | | | |
|--|----------------------|---------------|---------------|-------------|
| Total responses to the question | 403 responses | 174 responses | 220 responses | 9 responses |
| Agree with scheme objectives | 43% | 15% | 64% | 67% |
| Disagree with scheme objectives | 37% | 60% | 20% | 22% |

Table 10: Summary of key consultation findings

13.6 Views on the proposed selective licensing scheme

The results of the consultation show that 41% of respondents agree with the proposal for selective licensing and 47% disagree, with views strongly polarised between stakeholder groups. Residents (including private tenants) and business and other stakeholders are more in favour of the proposals with 63% and 78% respectively agreeing. Landlords are opposed to the proposals with 75% disagreeing.

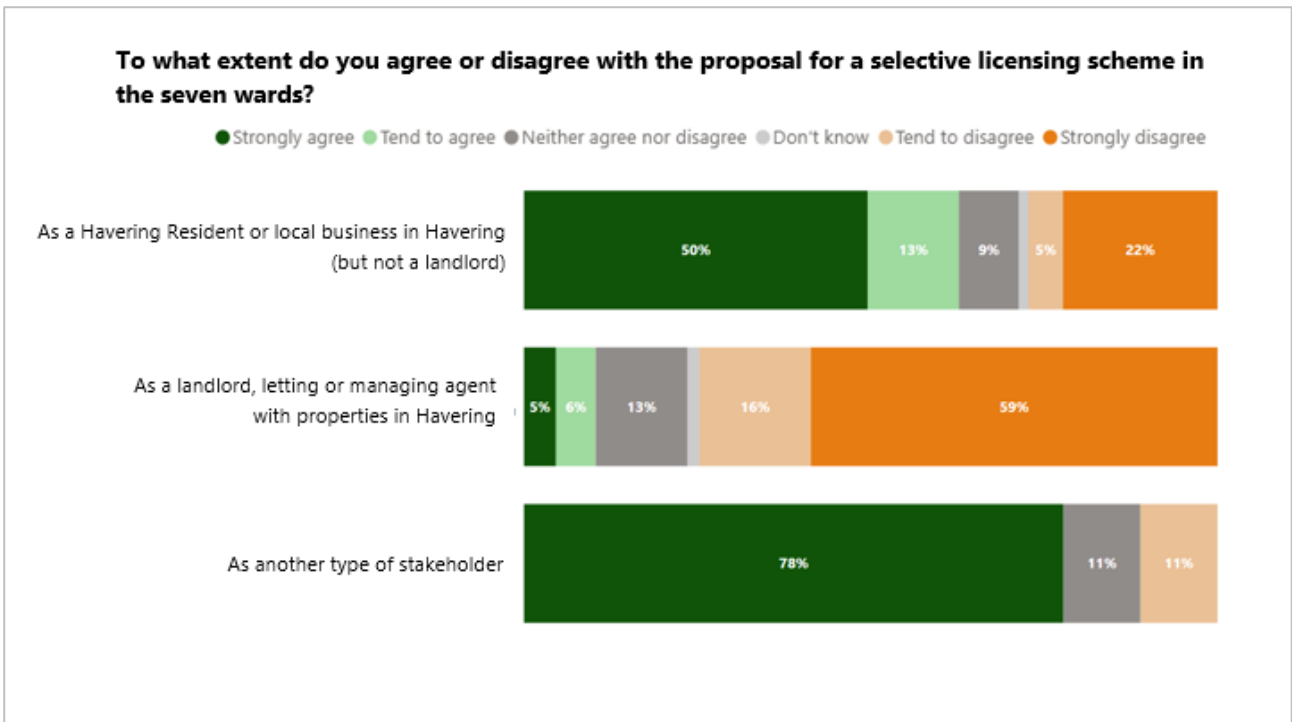


Figure 27: Respondents views on the selective licensing proposal by stakeholder group

13.7 Views on the proposed additional HMO licensing scheme

The consultation results show 59% of respondents agree with the proposal for additional HMO licensing scheme and 31% disagree although views were less polarised between stakeholder groups. Residents (including private tenants) and business and other stakeholders are more in favour of the proposals with 69% and 89% respectively agreeing with 45% of Landlords also agreeing and 36% disagreeing.

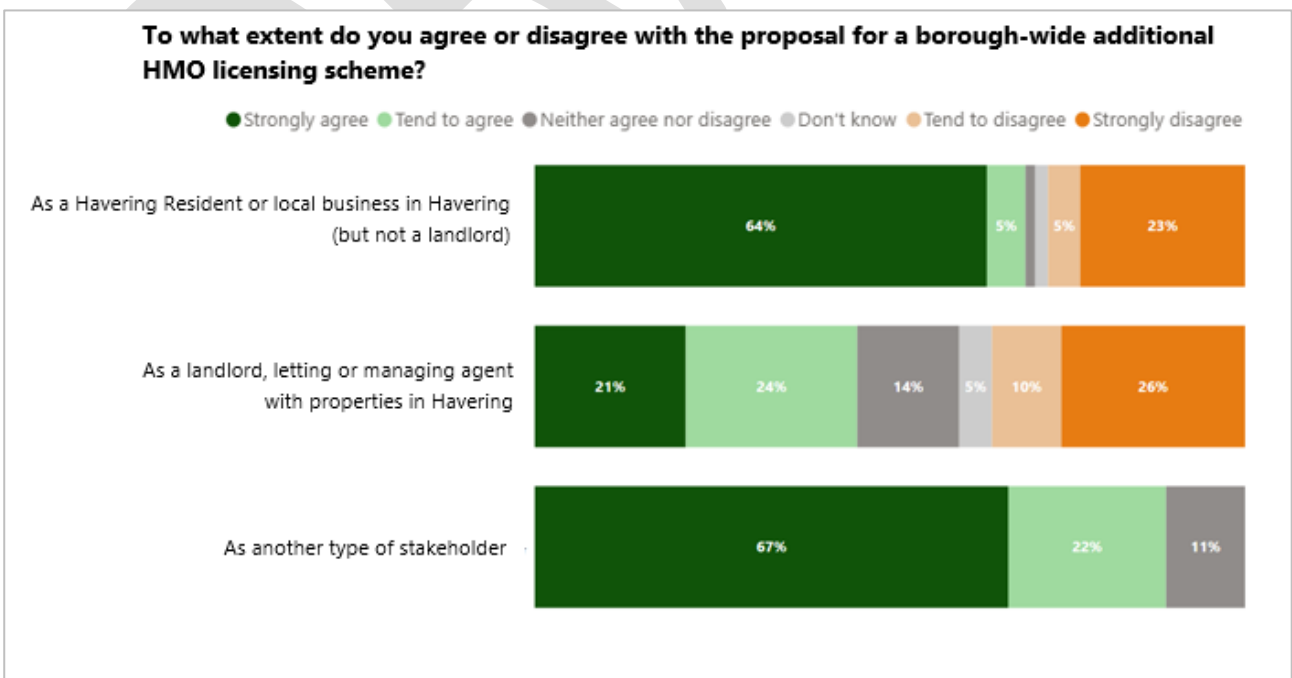


Figure 28: Respondents' views on proposed additional HMO licensing scheme by stakeholder group

13.8 Views on the proposed selective licensing scheme conditions

The consultation asked respondents for their views on the proposed selective licensing scheme conditions. The overall majority of respondents, 44% agreed with the proposed licence conditions, while 38% of respondents disagreed.

Looking at the responses by stakeholder group, residents (including private tenants) or local businesses and other stakeholders are in favour, with the majority, **67** per cent, of each group agreeing, whereas landlords, letting and managing agents are opposed, with **62** per cent disagreeing with the selective licensing conditions.

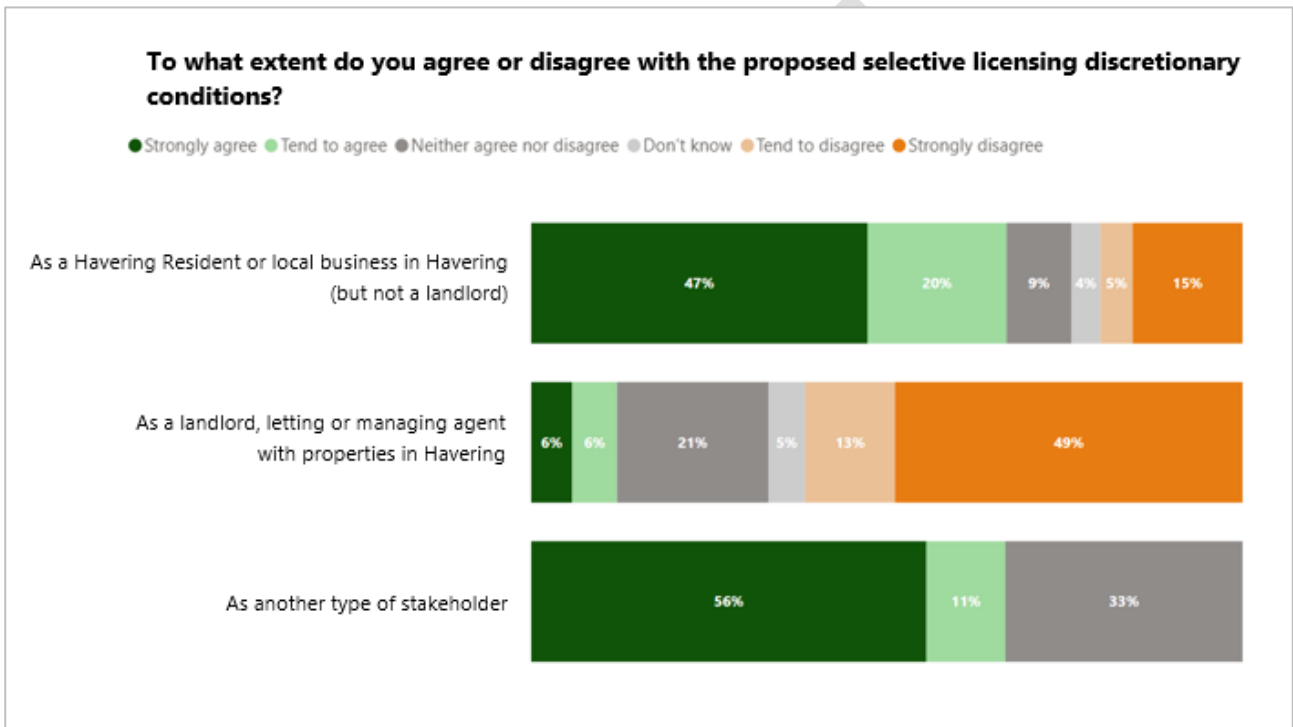


Figure 29: Respondents' views on selective licensing discretionary conditions by stakeholder group

13.9 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licensing scheme conditions. Most respondents, **47** per cent, agreed with the proposed additional HMO licence conditions, while **26** per cent of respondents disagreed. A proportion of respondents **27** per cent, neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents (including private tenants) or local businesses and other stakeholders are in favour, with the majority, **65** per cent and **77** per cent of each group respectively, agreeing with the additional HMO licensing conditions. Landlords, letting and managing agents had more mixed views, with **32** per cent disagreeing, **24** per cent agreeing with the additional HMO licensing conditions, and **43** per cent saying they neither agreed nor disagreed, or didn't know.

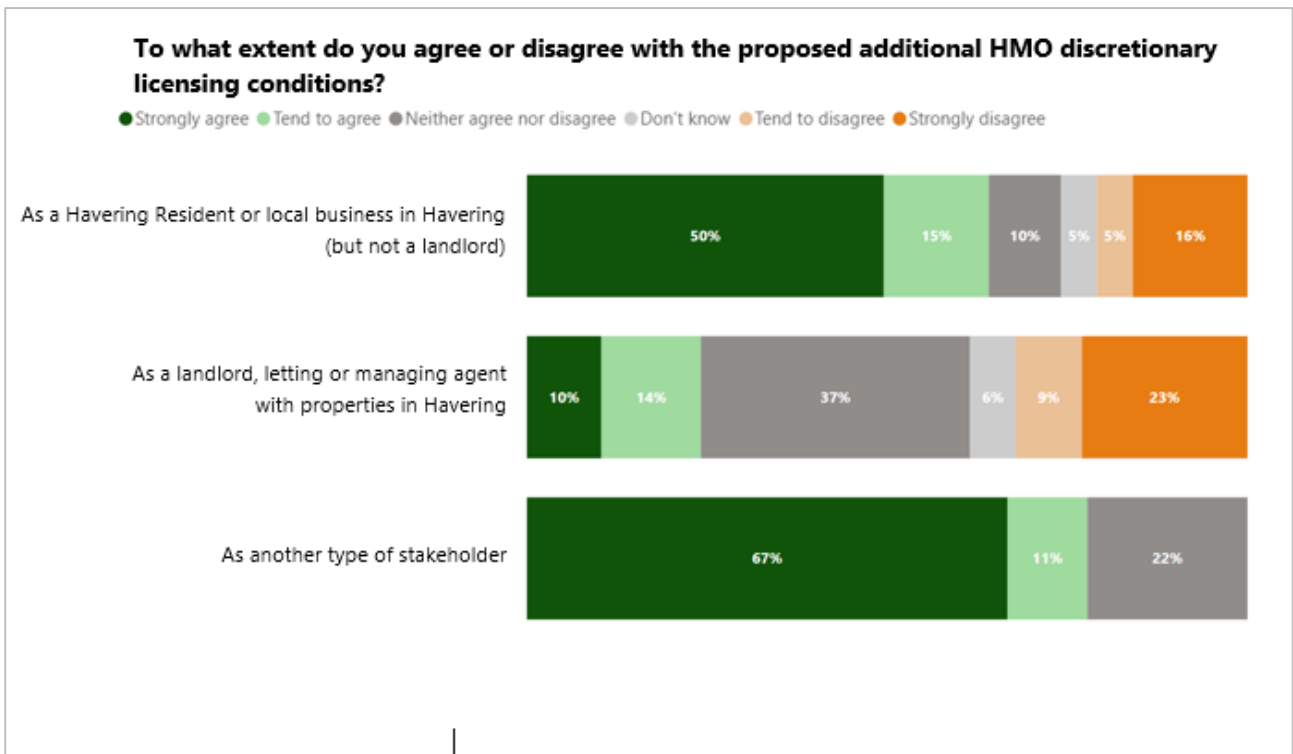


Figure 30: Respondents' views on additional HMO discretionary licensing conditions by stakeholder group

13.10 Views on the proposed selective licensing scheme fee

Respondents were asked how reasonable they feel the proposed selective licence fee of £950 for a five-year licence is. Most respondents, **52** per cent, said that they thought that the fee is too high, as opposed to **39** per cent who thought it was 'about right' or too low. Landlords, letting and managing agents were consistent in responding that the fee is too high, with **93** per cent selecting this option; the other stakeholder groups had more positive responses with **65** per cent of residents or local businesses and **55** per cent of all other stakeholders responding that the fee is 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**20** and **22** percent respectively) responded that the fee is too high.

What are your views on the proposed selective licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high

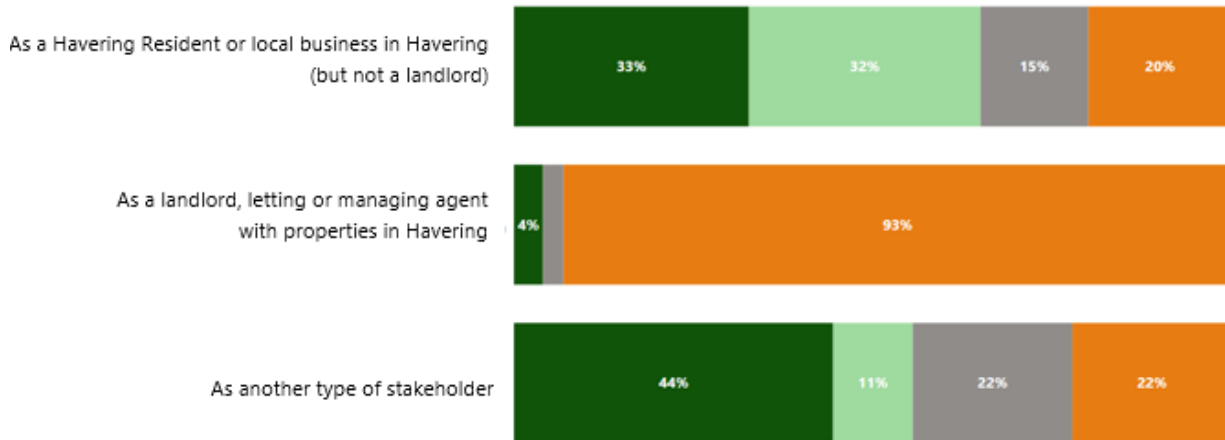


Figure 31: Respondents' views on the proposed selective licensing fee by stakeholder group

13.11 Views on the proposed additional HMO licensing scheme fees

Respondents were also asked how reasonable they feel the proposed additional HMO licence fee of £1400 for a five-year licence is. Most respondents, **45** per cent, said that they thought that the fee is too high. However, **43** per cent of respondents thought the fee was either 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **76** per cent selecting this option; the other stakeholder groups had more positive responses, with **65** per cent of residents or local businesses and **67** per cent of all other stakeholders responding that the fee is either 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**21** and **11** percent respectively) responded that the fee is too high.

What are your views on the proposed additional HMO licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high

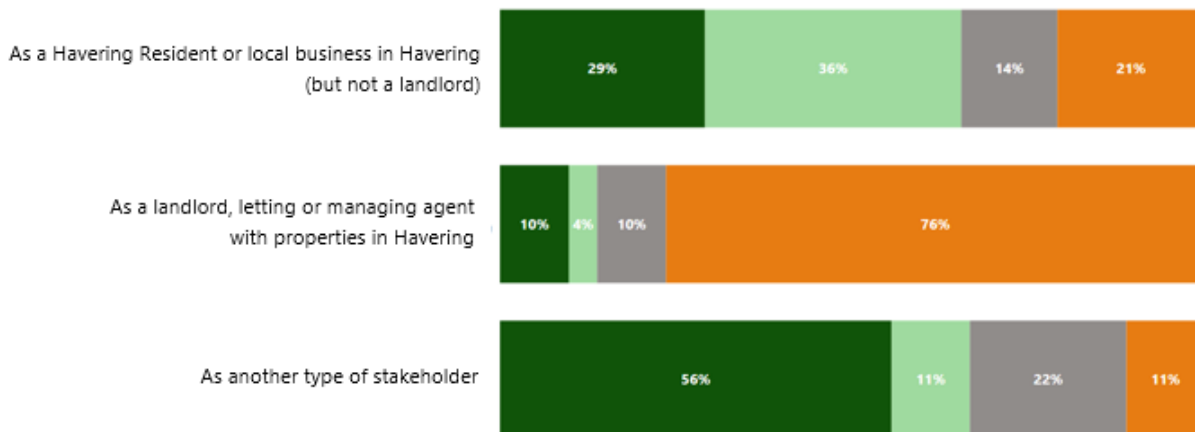


Figure 32: Respondents' views on proposed additional HMO licensing fee by stakeholder group

13.12 Views on the proposed licensing scheme discounts

| Nature of discount | Amount (Selective) | Amount (Additional) |
|-------------------------------|--------------------|---------------------|
| Accredited landlord | £100 off Part B | £100 off Part B |
| EPC C and above rating | £75 off Part B | £75 off Part B |
| Multi-dwelling | £100 off Part A | £100 off Part A |

Table 11: Proposed scheme discounts consulted on

Respondents were asked how reasonable they felt the proposed licensing fee discounts (shown in the table above) were.

Looking at the results by stakeholder group, around **75** per cent of landlords, letting and managing agents viewed the accredited landlord and EPC discounts as too low. When considering the multi-dwelling discount, a slightly lower proportion, **61** per cent, viewed the discount as too low.

Residents or local businesses views on the discounts are more positive, with over **50** per cent stating they viewed the accredited landlord, EPC multi-dwelling discounts as about the right level or too high, with only around **25** per cent viewing them as too low.

The responses of other stakeholders were more mixed for the Accredited landlord discount, with **44** per cent saying they were about the right level or too high, **33** per cent responding, ‘don’t know’, and **22** per cent saying they were too low. Views on the EPC and multi-dwelling discounts were more favourable, with the majority, **56** per cent, saying they were about the right level.



Figure 33: Respondent's views on fee discount by stakeholder group

The evidence shows that Havering Council has gone above and beyond the reasonable steps required to ensure they have consulted with those that are likely to be affected by the proposed schemes, and the consultation exceeded the statutory 10-week consultation period in accordance with the legislation and guidance.

As a result of the feedback and representations received during the public consultation several changes have been made to the scheme, as detailed below.

13.13. Response to representations

The Council has carefully considered all responses, feedback and representations made during the consultation. The consultation report and the response to the consultation will be published on the Council website and are also attached as Appendices 2 and 3.

14. Fees

The proposed fee structure is as follows:

14.1 Fee structure

Licence applicants will be required to pay a fee for each property that needs a licence. Several proposed discounts are outlined below. The proposed fee would be payable in two parts. The first part (Part A) would be payable upon submission of the application for the costs of processing and the administration in determining the application. Should the application be refused or rejected by the council or withdrawn by the applicant this first Part A payment will not be refunded. The second part (Part B) would be payable once the application has been assessed and the decision is made to grant the licence. This will cover the administration, management, and enforcement of the licensing functions for the schemes.

The proposed selective fee is £950 per property, and the proposed additional HMO fee is £1,400 per property. The fee would cover a licence for its duration of 5 years.

The Councils approach to the payment of licence fees is consistent with the judgment in the *Gaskin vs Richmond* case.

| Licence Type | Part A Fee | Part B Fee | Total Fee |
|----------------|------------|------------|---------------|
| Selective | £570 | £380 | £950 |
| Additional HMO | £840 | £560 | £1,400 |

Table 12: Licence fee structure

14.2 Discounts

The Council has considered a range of measures to ease any financial burden on good landlords in the borough. The reasons for proposing these discounts and the effect of the discount on total selective licence fee payable is detailed in Table 13 below.

| Category | Discount | Description | Justification | Total selective licence fee after discount | Total additional HMO licence fee after discount |
|---------------------|-----------------|---|---|--|---|
| Accredited Landlord | £100 off Part B | <p>Licence holder or managing agent is accredited under one of the following schemes:</p> <ul style="list-style-type: none"> • London Landlord Accreditation Scheme (LLAS) • National Residential Landlords Association (NRLA) • UK Association of Letting Agents (UKALA) <p>Or a member of the following schemes:</p> <ul style="list-style-type: none"> • Association of Residential Letting Agents (ARLA) • Safeagent | <p>Accreditation schemes require landlords and agents to demonstrate their expertise, ability and commitment to managing properties according to the highest standards.</p> <p>The discount recognises those landlords and agents who have taken a proactive approach to the management of their properties and tenancies.</p> | £850 | £1,300 |
| EPC rating C | £75 off Part B | Properties must have an EPC rating of C | <p>Properties with a C and above rated Energy Performance Certificate (EPC), including new builds, are less likely to encounter significant disrepair issues. Consequently, they require fewer inspections and enforcement actions to maintain property standards.</p> <p>Properties with an EPC rating of C or above are generally</p> | £875 | £1,325 |

| | | | | | |
|--|---|---|---|--|---|
| | | | <p>in better condition and less likely to have hazards such as damp, mould, and excess cold. As a result, these properties require fewer inspections and less enforcement action to ensure that property standards are met.</p> <p>This reduction in required resources is reflected in the discount provided to properties with a C or above EPC rating. The aim is to encourage property owners to improve the energy efficiency and overall condition of their properties, which in turn leads to a safer and healthier living environment for tenants.</p> <p>This also aligns to the Council's strategic commitment to climate change.</p> | | |
| Multiple leaseholds within the same freehold | £100 off Part A Part A fee will be payable at the full relate for the first flat. Discount will be applied in respect of applications relating to the 2 nd , 3 rd properties etc. | Applicable where multiple properties are: <ul style="list-style-type: none"> a. In common ownership and management control. b. Contiguous with each other in the same block or building c. All applications made at the same time. | There will be efficiencies in processing applications that relate to multiple units under the same ownership and control within the same building, which will result in cost savings. | £875 (for second, third etc eligible flat in a block) | £1,300* (for second, third etc eligible flat in a block) |

*Discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.

Table 13: Summary of fee discounts offered for selective licensing

Discounts will be determined on receipt of full application and all supporting documents.

Discounts **will not** be applicable where the council has:

- made two requests for additional supporting documents, or
- served a warning letter for failure to license the property
- unlicensed properties brought to their attention

Discounts Applied - Practical Examples

The following examples below illustrate the calculation of the total amount payable for a selective licence after discounts are applied, using a selective licence fee of **£950 (£570 for Part A; £380 for Part B)**.

Scenario A

| Scenario A | Property | Discount | Part A | Part B | Total Fee |
|---|----------|------------------------|-------------|-------------|-------------|
| Landlord has one property with an EPC rating of B | 1 | Part B reduced by £100 | £570 | £280 | £850 |
| | | Total | £570 | £280 | £850 |

Scenario B

Applicants may qualify for more than one discount concurrently, see example in scenario B:

| Scenario B | Property | Discount | Part A | Part B | Total Fee |
|---|----------|---|---------------|-------------|---------------|
| Landlord is accredited and has three properties. Each property is in a different part of the designated area. Properties 1 and 2 have and EPC rating of D. Property 3 has an EPC rating of C. | 1 | Part B reduced by £100 (£100 ACLL) | £570 | £280 | £850 |
| | 2 | Part B reduced by £100 (£100 ACLL) | £570 | £280 | £850 |
| | 3 | Part B reduced by £200 (£100 ACLL) + (£100 EPCB) | £570 | £180 | £750 |
| | | Total | £1,710 | £740 | £2,450 |

Scenario C

Applicants may also apply for a multi-dwelling discount where multiple properties in the same building are owned and under the control of the same person. A multi dwelling discount will be applied in respect of applications relating to the 2nd, 3rd properties etc.

| Scenario C | Property | Discount | Part A | Part B | Total Fee |
|---|----------|--|--------|---------------|-------------|
| Landlord is accredited and has four properties, 3 of which are in the same building, which has been converted into self-contained flats. Property 1 has an EPC rating of D. Properties 2, 3 and 4 have an EPC rating of C. | 1 | Part B reduced by £100 (£100 ACLL) | £570 | £280 | £850 |
| | 2 | Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB) | £470 | £180 | £650 |
| | 3 | Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB) | £470 | £180 | £650 |
| | 4 | Part A reduced by £100 (£100 MD) Part B reduced by £200 (£100 ACLL) + (£100 EPCB) | £470 | £180 | £650 |
| | | Total | | £1,980 | £820 |

Table 14: Examples of scenarios where discounts are applied

14.3 Instalment payments

The licence fee is payable in two instalments. The first instalment (Part A) payable when the application is submitted and the second instalment (Part B) payable once the application has been assessed and the decision to grant the licence made.

14.4 How the fee has been calculated

In setting the fee the Council has had regard to the Provision of Service Regulations 2009 and the Housing Act 2004 which confirms that when fixing fees the local authority may consider all costs incurred by the authority in carrying out their functions.

The calculation of fees takes account of the cost of setting up the licensing scheme, processing the applications, of administering any licences subsequently granted and, more generally, exercising its functions under Parts 2 and 3 of the 2004 Act. As such, the cost includes (but are not exhaustive):

- (a) Scheme set up cost – costs associated with the initial development of the licensing regime, including the cost of consultation and publishing policies, promotional material, publicity, development of application forms, web material, staff recruitment, and training.
- (b) Administration costs - staff time taken to process the application, data inputting, assessment of application, consulting with interested parties and other stakeholders, considering representations, determining license conditions, printing, postage, stationery, telephones, computers, IT licensing software, maintenance of public register, provision of advice and guidance.
- (c) On Costs – recharges for payroll, accommodation including heating, supplies, and services connected with the licensing function such as Finance, Legal and HR. Staff training.
- (d) Compliance and Enforcement costs - costs associated with initial licensing inspection, responding to complaints, compliance revisits, travel, equipment, stationery, data inputting, and on-costs.

The administration of the scheme is such that it is intended to be self-financing over the life of the scheme. The fees that are being applied are set at a level where the revenue from the fee will cover the cost incurred and will not generate a profit.

The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that the council expect to be licensed during the lifetime of the schemes and the numbers of those properties that are expected to be eligible for discounts. The fee will be reviewed annually as part of the Council's fees and charges process.

14.5 Benchmarking against other Councils

The Council recognises that the licence fee is higher than the current London average of £720 (Source: London Property Licensing, 2024). However, it is important to note that the fees for many of these current schemes are based on historical financial modelling conducted several years ago. These models do not account for the rising costs incurred by the council in recent years. As such, Havering's proposed fee reflects an adjustment to accommodate these increased costs.

It is also noted that several London Boroughs have recently commenced consultation for new schemes with proposed fees £900 and above. This suggests that the costs of operating a selective licensing scheme in London are significantly rising. Outside of London, licence fees have also risen.

Table 15 below provides a benchmark of Havering's proposed licence fees against a sample of Council's both within and outside of London.

| Local Authority | Selective licensing fee | Additional HMO fee |
|-------------------|-------------------------|--------------------|
| Newham | £750 | £1,250 |
| Wandsworth | £850 | £1,450 |
| Lambeth | £923 | £1,560* |
| Hackney | £925 | £1,400 |

| | | |
|-------------------------------|--------|-----------|
| Southwark | £945 | £1,365.10 |
| Havering | £950 | £1,400 |
| Barking & Dagenham | £950 | £1,400 |
| Westminster | £995 | £1,540 |
| Middlesborough Council | £998 | N/A |
| Leicester Council | £1,290 | N/A |

* Based on 3 lettings

Table 15: Benchmarking of selective licence fees against other Councils

Havering's selective licensing fee is relatively in proportion to its additional HMO licence fee when compared with other London boroughs running both schemes. It is also important to note that newer schemes will tend to have a higher fee to account for inflationary cost increases.

The proposed fee structure for licence applications is attached at **Appendix 6**.

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15. Conclusion

Havering's proposed additional and selective licensing schemes represents a carefully considered and well-supported strategic approach designed to address persistent challenges within the private rented sector. With a strong foundation based on robust evidence and clear objectives, the schemes aims to tackle poor housing conditions and ineffective property management, , ultimately improving the lives of tenants and supporting community safety.

The council has adhered to statutory requirements, including undertaking a thorough and comprehensive consultation in line with the Housing Act 2004. This process involved engaging with a wide range of stakeholders, including landlords, tenants, community groups, and other relevant parties, to gather feedback and ensure that the scheme addresses local needs and concerns. The consultation process not only demonstrates compliance with legal obligations but also provided the opportunity for the council to consider representations received and make changes to its proposals, ensuring it is both fair and responsive to the community's needs.

The legal justification for the schemes is robust, with the proposals firmly grounded in national and local housing legislation. This provides a solid legal framework for the licensing process, ensuring that the council's actions will withstand scrutiny and deliver meaningful benefits for local communities. The clear legislative backing enhances confidence in the schemes, offering clarity for landlords, tenants, and the wider community about the standards and expectations set.

By requiring landlords in designated areas to obtain a licence, the schemes will create a clear framework of accountability for property maintenance and tenant welfare. This will directly contribute to improved housing standards, reduce the risk of tenant exploitation, and foster safer, more cohesive communities.

In conclusion, the evidence shows that the proposed additional and selective licensing schemes area well-justified measure that will provide significant benefits for the residents of Havering. The schemes form a vital part of the council's strategic approach to deliver long-term improvements in housing quality, social cohesion, and regeneration, ensuring that the borough's future is marked by an improved quality of life for all.

16. Appendices

| Appendices | Document |
|-------------------|--|
| Appendix 1 | Housing stock and stressors report (Metastreet, 2025) |
| Appendix 2 | Consultation Report, 2025 |
| Appendix 3 | Council response to comments received during public consultation |
| Appendix 4 | Selective Licence Conditions |
| Appendix 5 | Additional Licence Conditions |
| Appendix 6 | Schedule of Fees, Charges and Discounts |