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**Consultation on licensing
private rented property in
Enfield**

Enfield Council

Report

December 2019



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Project details and acknowledgements

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1. Executive Summary

This summary provides the main findings from the consultation undertaken on Enfield Council's proposals to introduce Selective Licensing in 14 wards (Bowes, Chase, Edmonton Green, Enfield Highway, Enfield Lock, Haselbury, Jubilee, Lower Edmonton, Palmers Green, Ponders End, Southbury, Southgate Green, Turkey Street and Upper Edmonton), and Additional Licensing for Houses in Multiple Occupation (HMOs) across the whole borough of Enfield.

A variety of methods were used to consult with landlords, tenants, residents, businesses, stakeholders and other interested parties. These included an online survey, which was hosted independently by M·E·L Research, along with a face to face survey, which was representative of residents in the borough (by wards, age and gender). Four public meetings were held, a feedback form was provided for written responses, along with an email address for any written responses and queries, along with a freephone number.

The consultation ran for 13 weeks from 28 August to 29 November 2019. In total, 1,861 responses were received: 794 from the online survey and 1,067 from the face to face survey. Qualitative feedback was recorded at four public meetings, via 35 written responses submitted by interested parties and via 10 stakeholder interviews/responses.

The results include support for a proposal that the Council is considering introducing to improve the private rented sector:

- Implement a Selective Licensing scheme in 14 wards of the borough (in 2 separate designations)
- Implement a borough-wide additional (HMO) licensing scheme across the whole of the borough.

The consultation also looked at views on the proposed licensing conditions, fees and alternatives that the council could consider. We also asked respondents who were not in support of the proposals to provide reasons for their views and to identify any likely impact that each licensing scheme would have on them.

Key findings

1. Selective Licensing scheme in 14 wards

Table 1: Responses to Selective Licensing proposal (overall responses/by respondent group)

	Overall	Landlords	PRS tenants	Residents	Other
Base	1,855	440	362	1,208	25
Agree with Selective Licensing proposal	69%	18%	81%	86%	80%
Disagree with Selective Licensing proposal	25%	73%	11%	10%	16%
Base	1,849	435	363	1,026	25
Agree with proposed Selective Licensing conditions	71%	23%	82%	88%	80%
Disagree with proposed Selective Licensing conditions	21%	63%	9%	7%	12%
Base	1,828	437	365	25	1,031
Selective Licensing fee is reasonable	53%	10%	57%	69%	76%
Selective Licensing fee is not reasonable	43%	89%	36%	26%	20%

- Support for the Selective Licensing proposal is strong overall with around seven out of ten (69%) respondents agreeing with the proposal. A quarter disagree (25%).
 - Residents are most supportive of the proposal, followed closely by private rented tenants (86% and 81% agreeing);
 - Landlords are least in favour of Selective Licensing, with around three quarters (73%) disagreeing with the proposal, and only one in five (18%) agreeing. This is much higher than for Additional Licensing;
 - The most common reason respondents give for disagreeing with the proposal is that it is a **money-making scheme** (96 comments from 400 respondents).

- Around seven out of ten respondents (71%) agree with the proposed **Selective Licensing conditions**, whilst a fifth (21%) disagree.
 - Residents are most supportive of the proposed conditions (88% agree);
 - Landlords are most strongly opposed to the conditions, with around six out of ten disagreeing (63%).

- Over half of respondents (53%) feel the proposed **Selective Licence fee is reasonable**. However, four out of ten (43%) feel the licence fee is not reasonable.
 - Support is strong amongst 'other' respondents and residents (76% and 69%), whilst lower amongst private rented tenants (57%);
 - Landlords are much more negative, with 89% saying they are not reasonable.

2. Borough-wide Additional Licensing scheme

Table 2: Responses to borough-wide Additional Licensing proposal (overall/by respondent group)

	Overall	Landlords	PRS tenants	Residents	Other
Base	1,860	439	365	1031	25
Agree with Additional Licensing proposal	72%	30%	81%	87%	76%
Disagree with Additional Licensing proposal	20%	56%	9%	9%	16%
Base	1,853	437	363	1,028	25
Agree with proposed Additional Licensing conditions	73%	28%	83%	89%	84%
Disagree with proposed Additional Licensing conditions	19%	54%	9%	7%	12%
Base	1,833	428	361	22	1,022
Additional Licensing fee is reasonable	53%	12%	57%	69%	77%
Additional Licensing fee is not reasonable	41%	84%	36%	26%	18%

- Support for a borough-wide Additional Licensing scheme is also strong overall with around seven out of ten (72%) respondents agreeing with the proposal. One in five disagree (20%).
 - Residents are most supportive of the proposal, followed closely by private renters (87% and 81% agree);
 - Landlords are least in favour of Additional Licensing, with over half (56%) disagreeing with the proposal, and only three out of ten (30%) agreeing;
 - The most common reason respondents give for disagreeing with the Additional Licensing proposal is also that they feel it is a **money-making scheme** (96 comments from 400 respondents).

- Around three quarters of respondents (73%) agree with the proposed **Additional Licensing conditions**, with half (51%) strongly agreeing. Around a fifth (19%) disagree.
 - Residents are most supportive of the proposed conditions, followed closely by private rented tenants (89% and 83% agree);
 - Landlords are most strongly opposed to the conditions, with over half disagreeing (54%).

- Over half of respondents (53%) feel the proposed **Additional Licence fee is reasonable**. However, four out of ten (41%) feel the licence fee is not reasonable.
 - Support is very strong amongst residents and 'other' respondents (69% and 77%), whilst slightly lower amongst private rented tenants (57%);
 - Landlords are much more negative, with 84% saying they are not reasonable.

3. Alternatives to licensing

The top four themes suggested as alternatives to consider instead of licensing schemes, are around doing more with the tools and powers that the Council already has (1,046 comments from 707 respondents). These include:

1. The Council could do more checks and inspections (110 comments);
2. Better enforcement action to be taken (83 comments);
3. Having an easier method for reporting problems with landlords/properties (74 comments);
4. The Council should make better use of their existing powers (70 comments).

4. Other comments about the proposals

Respondents were asked whether they had any other comments to add about the proposed licensing schemes (888 comments were received from 681 respondents). The most common comments were that;

1. Agree in general with the proposed schemes (328 comments);
2. Fees should be altered (such as offer incentives/reduced/free) (72 comments);
3. Concern that there could be rent increases (69 comments).

5. Stakeholder views

In total, 10 stakeholders were interviewed and/or provided a written response (free text) to the consultation. Almost all stakeholders are concerned where the costs for licensing would end up, with many feeling they will be passed onto tenants. There is a clear divide across almost all areas, between public/third sector stakeholders and landlord/agent associations. Public/third sector stakeholders are generally in favour of both proposals and the need to regulate the private rented sector, more in favour of Additional than Selective Licensing, whilst landlord/agent associations do not support licensing and suggest there is little evidence that they work.

There were also mixed views on the scope of the schemes, with some public/third sector organisations feeling that both schemes should be borough-wide to avoid the risk of confusion, whilst landlord/letting agent associations feel that the Council should be much more targeted and start off small (if they are going to do this at all). Other alternatives suggested by landlord/letting agent associations that the Council could consider, included a delivery partner route, co-regulation or collaboration with other agencies to tackle specific issues such as anti-social behaviour (ASB).

6. Views from the public meetings and written responses

Four public meetings were held (two for landlords/letting agents and two for private rented tenants and residents), with 241 attendees. Feedback was also received via 35 email responses/feedback forms. Feedback is largely from landlords, as most attendees were landlords, as were the written responses. Key comments are that landlords feel that they **cannot be held accountable for tenant behaviour**, particularly around ASB, that **licensing is an unnecessary and unfair tax on landlords**, the vast majority of whom provide decent accommodation, and that the **Council should target rogue landlords** instead of taking a blanket approach. Many felt also that the **Council should tackle issues arising from social housing tenants**, rather than private rented tenants.

2. Introduction

Background

The number of people living in Enfield's private rented sector has almost trebled since 2001, with renting from private landlords now the fastest growing housing tenure. An estimated 34% of Enfield's homes are now privately rented with a growing number of families with children living in the sector.

The Council recognises that many landlords operating in the borough take their responsibilities seriously and provide well managed rented homes that are maintained to a good standard. But there are also widespread issues of disrepair and housing hazards in the private rented sector and poorly managed properties that give rise to significant and persistent ASB, especially compared to homes in other sectors.

Enfield Council is considering introducing licensing schemes to help tackle these problems. As part of the considerations, the Council has consulted on proposals to designate the borough, or a large part of it, as subject to two licensing schemes for private rented properties, under Parts 2 and 3 of the Housing Act 2004. It is proposed, subject to legislative requirements, that these would both come into effect in the summer of 2020.

Proposals

The consultation focused on the degree to which respondents agree or disagree with the proposal being considered by the Council around introducing:

- Selective Licensing covering 14 wards in two designations (Bowes, Chase, Edmonton Green, Enfield Highway, Enfield Lock, Haselbury, Jubilee, Lower Edmonton, Palmers Green, Ponders End, Southbury, Southgate Green, Turkey Street and Upper Edmonton); and
- A borough-wide Additional Houses in Multiple Occupation (HMO) Licensing scheme.

The consultation also looked at views on the proposed licensing fees and conditions and alternatives that the Council could consider.

Public consultation

The consultation ran for 13 weeks from 28 August to 29 November 2019. A variety of methods were used to promote the consultation across a wide range of communication channels, to inform those who may potentially be affected by the proposals. A variety of consultation methods were used to allow interested parties to share their views on the proposals. These are detailed below.

Methods of promotion

The consultation used the following methods to publicise and promote the consultation as widely as possible. These were undertaken by the Council and partners:

1.1 Landlord and stakeholder discussions events:

- One event called the Council Housing Leaseholder Forum using a similar format as the public meeting was held on 3 Oct 2019 at Enfield Civic Centre 20 landlords, letting agents and landlord representative bodies attended the event (most of whom were different attendees to those that attended landlord and letting agent public meetings on the 30 September and 30 October).

1.2 Resident/tenant discussion events:

- One quarterly event, Customer Voice Enfield with residents and tenants was supported on Wednesday 20 November, 6pm-8pm, 12 participants attended, of whom 5 were leaseholders and 7 were residents
- Two local forums, the Enfield Society and the Haselbury, Lower Edmonton and Upper Edmonton area forum, with local residents and tenants were supported on 2 October and 25 September respectively. The Enfield Society meeting had 11 attendees, and the Haselbury, Lower Edmonton and Upper Edmonton area forum has 25 attendees.

1.3 Stakeholder Engagement:

Over 2500 stakeholders were directly informed about the consultation. These included councillors and MPs, all neighbouring and nearby London boroughs, public sector and community/voluntary organisations, social housing associations, local letting agents, tenant and landlord representative bodies all were directly contacted via and invited to respond to the consultation. This included emails, letters, e-newsletter and bulletin correspondence, and follow-up letters/emails along with calls to key stakeholders to periodically inform them to participate.

In total, 30 such stakeholders responded via email with comments and queries, including formal responses by letter from the Greater London Authority, a Greater London Assembly member, Hackney Council, Waltham Forest Council, Haringey Council, GMB Union and ARLA Propertymark.

- **Landlords** – 2,132 contacted on 4 September, and 1,936 contacted again between 8th and 14 October - landlords on the council's database that opted to receiving relevant communication from the council.
- **Councillors** – 154 (for all London Borough and neighbouring boroughs - Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Broxbourne, Camden, Ealing, Enfield, Epping Forest, Greenwich, Hackney, Hammersmith & Fulham, Haringey, Harrow, Havering, Hertsmere, Hillingdon, Hounslow, Islington, Kensington & Chelsea, Kingston, Lambeth, Lewisham, Merton, Newham, Redbridge, Richmond, Southwark, Sutton, Tower Hamlets, Waltham Forest, Wandsworth, Welwyn Hatfield, Westminster)

- **MP's** – 79 (For all London and neighbouring boroughs)
- **Chief Executives** – 36 (For all London and neighbouring boroughs)
- **Greater London Authority**
- **London Councils** (represents 32 boroughs and City of London)
- Neighbouring and London Boroughs
 - **Neighbouring:** Waltham Forest, Barnet, Haringey, Broxbourne, Epping Forest
 - **Other London Boroughs:** Redbridge, Brent, Barking and Dagenham, Newham, Welwyn and Hatfield, Hackney
- **Public Sector and community/voluntary organisations:** Eight (Shelter, Generation Rent, Citizen Advice Enfield, North London Credit Union, London Fire Brigade, UK Border Agency, Police and National Trading Standards)
- **Housing Associations** - 32
- **Local letting agents** - 93
- **Tenant and landlord representative bodies:**
 - Two tenants' associations – The Tenant's Voice and London Renter's Union.
 - Three Landlord Associations – National Landlords Association (NLA), Residential Landlords Association (RLA) and the Accredited Residential Landlords Association (ARLA)
- **Local Residents Groups** - The Federation of Enfield Residents' & Allied Associations
- **Dedicated Council Newsletters:** -in total 144,216 subscribers targeting all stakeholder groups of residents, tenants and businesses
 - News from the Council
 - Information for Council Tenants & Leaseholders
 - Cycle Enfield
 - Improving Enfield
 - Jobs and Training
 - Waste & Recycling
 - Enjoy Enfield
 - Information for Local Businesses
 - Have Your Say
- A dedicated phone line and two email address were available to residents, tenants, landlords and letting agents to ask questions about the proposed schemes and consultation or receive help to respond to the consultation. 83 inbound emails and 45 phone calls were received, and relevant responses are included within this report.

Communication Channels

The consultation was promoted through the council's communications channels and a host of local, regional and national on and offline media. Communications were targeted at local residents, tenants, landlords, stakeholders, voluntary organisations and businesses within Enfield.

1. Local door drops of A5 leaflets issued to 127,000 residents and 5,000 businesses on between 7 and 15 September
2. Every Enfield household leaflet drop alongside the waste info pack on 9 September
3. 13 quarter/ full page local press adverts placed with 3 newspapers (Parakiaki, Enfield independent and Enfield Dispatch) 29 August (2 adverts) 5 September and 27 September (2 adverts), 3 October, 24 October, 31 October and 14 November (2 adverts). With a total distribution of 47,000 local households and estimated readership of 238,068 (print only).
4. 5 articles in Council digital newsletters, reaching 52,584 subscribers issued on 29 August, 4 October, 17 October, 31 October and 4 November
5. 7 banner ads in Council digital newsletters reaching 35,917 subscribers placed on 16 September, 4 October, 7 October, 8 October, 9 October and 24 October.
6. Periodic internal communication with over 2,000 council staff messaging on plasma screens, in staff newsletters and distributing A5 leaflet information.
7. 5-week large outdoor poster campaign (clear channel) across 23 sites within Enfield, from 23 September until 21 October
8. Social Media Activity (both paid and organic) went live from the 4 October until and continued until week ending 29 November. Paid social media posts were targeted to landlords and tenants to raise awareness of the consultation and the public meetings during the initial stages of the consultation. Following the public meetings, the paid for posts were reviewed and re-targeted at private rented tenants, to encourage a greater response rate to the questionnaire from that group.
9. Organic social media posts were targeted at landlords, residents and tenants, using a variety of messaging, designs and videos to direct people to complete the online survey throughout the 13 weeks of the consultation.
10. 56 twitter posts and 28 Facebook posts 517 clicks, 73 re-tweets/shares and 162 likes.
11. Facebook and Twitter social media platform promotion at a local level targeting local residents, tenants and landlord accounts. 4 Facebook Ads and 1 Facebook Boosted Post reached 166,508 generating 2,372 link clicks. 3 Twitter Ads had 176,566 impressions and generated 896 link clicks
12. >1,300 A5 leaflets placed at GP surgeries, Enfield Town Post Office, Age UK, Dugdale centre, Edmonton Police Station, Enfield Food Bank and distributed at 4 public meetings and resident forums, from the 30th September to 13th November
13. >200 A3 and A4 posters for libraries/children centres/leisure centres/health centres and surgeries /community offices/ job centres/ park notice boards were posted, emailed and delivered from the 23 September to 28 October

14. 6 large outdoor banners placed at Forty Hall fence line, Groveland's Park fence line, Pymmes Park fence line, Bury Lodge fence line, Delhi Garden fence line, and Broomfield fence line from the 29 October to 29 November
15. 6 Pull up banners placed at John Wilkes House, Enfield Civic Centre, Ordanance Road Surgery, and job centres in Edmonton, Enfield Chase and Palmers Green from 18 October to 29 November
16. > 100 A5 leaflets handed out to passers-by within Enfield at town centre and two train stations between w/c 28th October.

Communications targeted at residents, tenants, stakeholders, voluntary organisations and businesses in neighbouring boroughs and beyond.

17. A 9-week digital campaign ran from 30th September until the end of the consultation, with a reach of 67,609 and 238,875 impressions, resulting in 1,176 clicks. The click through rate (CTR) for the full campaign was 0.49% which is higher than the industry average for display ads of 0.35%;

The campaign was geographically targeted at London boroughs, with the initial target audience of landlords and letting agents;

The audience who had already engaged in LBE's Enfield Let campaign (a campaign about letting your property to Enfield Council);

The audience who had visited and landlord or housing related pages on the council's website ;

The campaign was reviewed at the halfway point and retargeted towards those who had clicked on any of the campaign adverts but did not complete the questionnaire. The artwork for the campaign was also refreshed three times during the campaign to provide a fresh but consistent look and further engage the audience;

In addition to the core digital campaign, the Council also advertised on the council's website, including using the i-bar adspace, which is only used for high priority campaigns. The i-bar advertisement resulted in 655,798 impressions and 991 clicks;

18. 14 x ¼ and ½ page local press advertisements placed in six neighbouring and national newspapers:
 - Asian Post – National newspaper with a distribution of 45,000 and readership of 125,000(print only). 1 advert on 30 August;
 - Avrupa – A London-wide Turkish newspaper with a distribution of 12,500 and readership of 10,000 (print only). 2 adverts on 29 August and 24 October;
 - Barnet Borough Times – Covering Hendon, Finchley, Barnet, Potters Bar, Edgware and Mill Hill, with a distribution of 30,000 and a readership of 47,000 (print only). 3 adverts on 5 September, 26 September and 14 November;
 - Harrow Times – Distribution of 35,000 and a readership of 80,000 (print only) in Harrow. 3 adverts on 5 September, 3 October (full page) and 24 October;
 - Your Local Guardian Waltham Forest – Covering Walthamstow, Leyton and Leytonstone with a distribution of 7,846 and a readership of 17,840 (print only) 2 Adverts on 5 September and 17 October;
 - Epping Forest Guardian – Covering Epping Forest, with a distribution of 11,000 and a readership of 26,620 (Print only). 2 adverts on 5 September and 17 October.

19. Press release to local, regional, national and industry media (for example LBC, BBC London (radio and TV), the Evening Standard, the Jewish Chronicle, Enfield Independent, Enfield Dispatch, London Greek Radio, London Turkish Radio and London Live) outlets was issued on the 28th August 2019.
20. Enfield Council consultation page went live on Wednesday 28th August 2019.

Consultation methods

A variety of methods were used to consult with landlords, tenants, residents, businesses, stakeholders and other interested parties. These included an online survey, which was hosted independently by M·E·L Research, along with a face to face survey, which was representative of residents in the borough (by ward, age and gender). Four public meetings were held (two for landlords and agents, and two for private rented tenants and residents), a feedback form was provided for written responses, along with an email address for any written responses and queries, and a freephone number. Stakeholder interviews were also undertaken to get wider views from local and national organisations working within the sector.

In total, the consultation generated 1,861 responses to a survey, 35 written responses and 10 stakeholder interviews/responses. In total, there were 241 attendees across the four public meetings. Of those who took part in the online survey, 5 responses to the survey were from respondents outside of the borough. These have been included within the overall analysis and results provided separately in Appendix 5.

1. Online survey

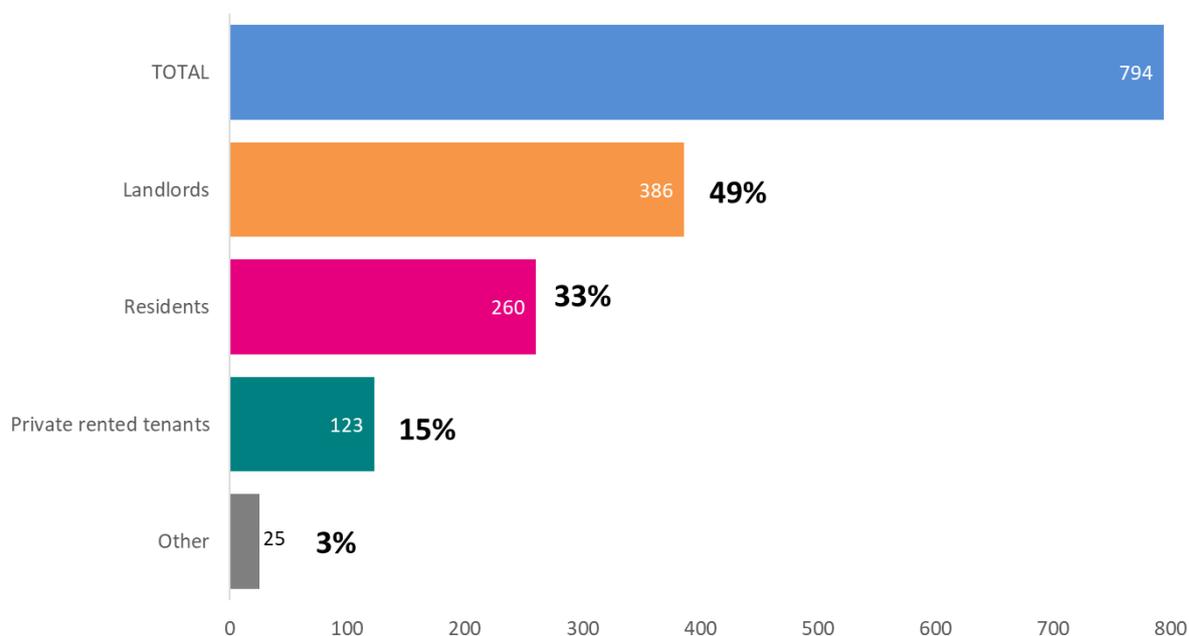
The online survey was open to all interested parties to have their say on the proposals. In total, there were 794 responses to the online survey. The profile of respondents to the online survey appears to show a high proportion of landlords (and agents), when compared to other groups in the borough, such as residents and private rented tenants (49% of respondents to the online survey). For the purposes of this consultation, results have been grouped to show respondents as 'landlords', which includes both landlords and letting/managing agents, 'private renting tenants', 'residents' and 'Other'. This includes the following descriptions:

- Own or manage a business
- Represent a business organisation
- A community group or charity
- 'Other'.

Where people identified themselves as belonging to more than one group, we have assigned respondents to one principal group (prioritised by landlords/agents first, followed by private renting tenants, residents and then 'other').

The chart below shows the breakdown of respondents by profile:

Figure 1: Respondent profile to online survey (n=794)



2. Residents survey

A face to face survey was undertaken by trained M·E·L Research interviewers, with 1,067 residents across the borough. M·E·L Research is a licensed user of CACI Ltd's InSite GIS software, which includes the latest version of Royal Mail's Postcode Address File (PAF).¹ Using PAF, we drew a stratified (by Ward) random sample of starting addresses from which to conduct the survey, with interviewers conducting between five and six interviews clustered around starting address.

M·E·L Research then used 2011 Census data and the latest ONS mid-year population projections (2018) as the sampling frames to set quotas for the collection of a representative sample of residents. Quotas were set for gender and age bands for each Ward.

The table below shows the breakdown of respondents by this profile:

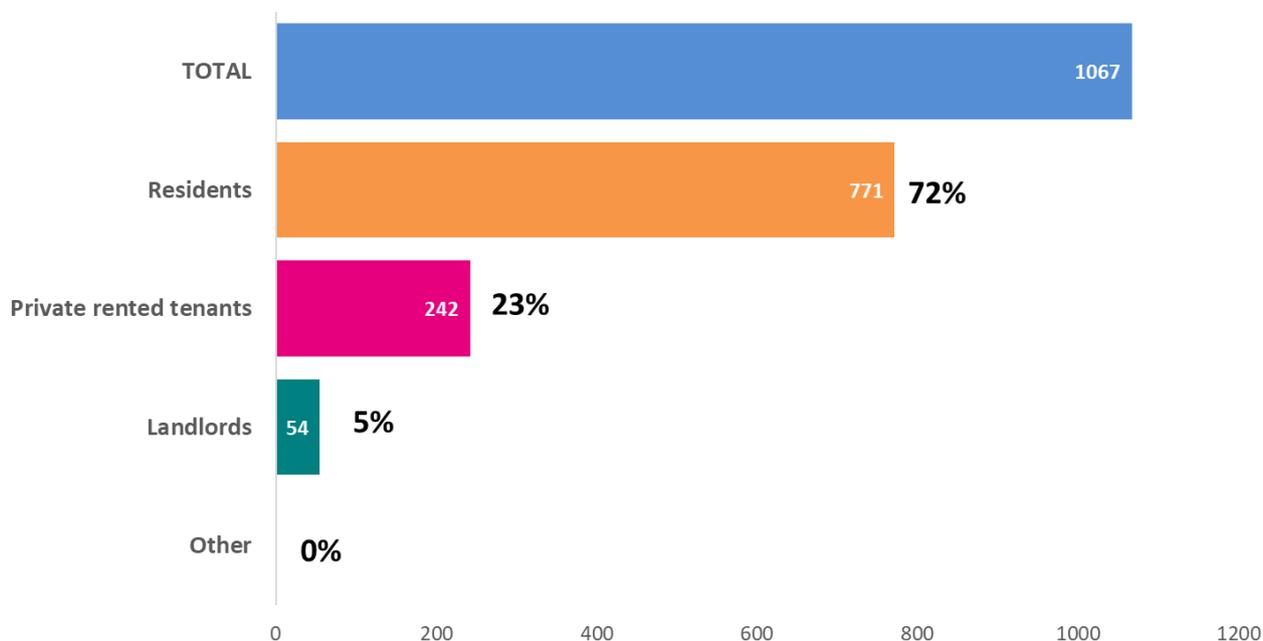
¹ PAF is a database which contains all known "Delivery Points" and postcodes in the United Kingdom, covering over 29 million Royal Mail postal addresses and 1.8 million postcodes.

Table 3: Respondent profile to face to face residents survey (by demographics) (n=1.067)

Ward / Respondents	Total	Age Group																Gender	
		19 or under	20-24	25-29	30-34	35-39	40-44	45-49	50-54	55-59	60-64	65-69	70-74	75-79	80-84	85+	Prefer not to say	Male	Female
Bowes	50	3	4	3	7	5	5	3	4	2	6	5	1	1	1	0	0	27	23
Bush Hill Park	47	3	3	3	5	5	5	2	7	3	3	3	1	2	2	0	0	28	19
Chase	45	4	2	3	5	7	3	4	4	2	4	1	3	3	0	0	22	23	
Cockfosters	45	0	6	1	8	2	6	3	5	4	3	0	1	4	2	0	19	26	
Edmonton Green	62	3	5	9	3	12	2	10	1	6	1	7	2	1	0	0	31	31	
Enfield Highway	55	5	2	8	3	3	7	3	7	2	2	1	2	0	2	3	27	28	
Enfield Lock	59	3	4	5	8	4	8	6	4	2	5	4	3	2	1	0	30	29	
Grange	44	3	5	4	4	4	3	1	5	3	4	1	5	2	0	0	22	22	
Haselbury	56	4	4	3	6	3	7	7	2	4	6	4	1	3	2	0	29	27	
Highlands	43	3	6	2	4	6	4	5	2	3	3	4	1	0	0	0	19	24	
Jubilee	52	1	5	5	5	8	2	4	7	5	3	4	3	0	0	0	23	29	
Lower Edmonton	55	3	5	8	4	7	3	8	2	4	0	6	2	2	1	0	28	27	
Palmers Green	51	1	5	3	7	7	2	4	6	5	3	4	3	1	0	0	26	25	
Ponders End	50	4	2	3	7	6	4	8	1	4	3	2	2	1	2	1	25	25	
Southbury	51	1	7	6	5	4	7	5	2	3	4	2	2	0	1	1	24	27	
Southgate	49	3	4	4	4	5	5	3	7	4	2	2	2	2	0	2	26	23	
Southgate Green	45	1	5	5	4	3	5	2	7	4	2	3	2	1	1	0	22	23	
Town	48	1	4	4	6	5	5	2	6	5	1	4	2	0	2	1	25	23	
Turkey Street	50	3	5	5	6	3	4	5	3	5	2	2	4	1	2	0	24	26	
Upper Edmonton	65	6	6	6	7	5	5	6	4	10	1	4	3	0	2	0	34	31	
Winchmore Hill	45	4	2	2	7	2	7	5	3	3	2	5	1	0	1	0	22	23	
TOTAL	1067	59	91	92	115	106	99	96	89	88	60	68	46	26	22	8	1	533	534

The chart below also shows the profile of respondents to the face to face survey by whether they are identified as a landlord/agent, private rented tenant, resident or ‘other’.

Figure 2: Respondent profile to face to face residents survey (n=1,067)



3. Stakeholder consultation

Enfield Council identified a range of stakeholders to be consulted on the proposals. All 13 organisations were contacted by email/phone and invited to take part. In total, 10 organisations were either interviewed or provided written responses to the proposals.

Table 4: Stakeholder profile

Stakeholder profile	Number spoken to	Number providing written responses
Fire and Rescue	1	-
Metropolitan Police	1	-
Landlord/letting agent associations	4	3
North London credit union	1	-
Citizens Advice Bureau	1	-
Safer Renting	1	-
London Assembly	-	1
TOTAL	9	4

Responses from the interviews/written responses have been analysed and key themes identified in Section 4 of the report.

4. Public meetings

Four public meetings were hosted by M·E·L Research, to introduce the proposal to anyone interested in finding out more about the proposal and to share their views. These were largely set up to focus on specific groups - two meetings for landlords and agents, and two groups for tenants and residents. Council officers were present at each of the public meetings, with a Question and Answers session included as an opportunity for attendees to ask the council any questions about the proposals, as well as to provide them with an opportunity to feedback views and concerns. The dates, times, venue and approximate number of attendees (more came than were booked on) for each meeting are presented below.

Table 5: Public meetings information

Date/time	Venue	Approx. no of attendees
30 September (7-9pm)	Dugdale Centre, Enfield	98
7 October (7-9pm)	Dugdale Centre, Enfield	36
30 October (9.30-11.30am)	Green Towers, Edmonton	23
30 October (7-9pm)	Green Towers, Edmonton	84

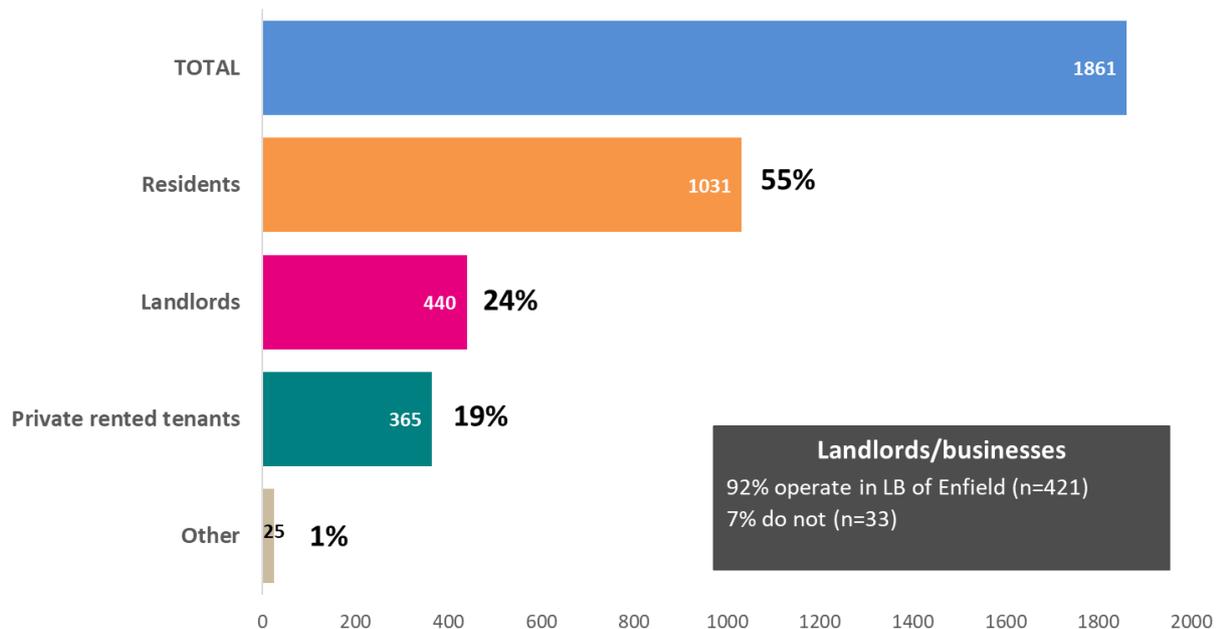
5. Written feedback/responses

In addition, respondents were asked to submit written responses if they wished. They could do this either by a feedback form online, by email, by letter or by telephone. In total, 35 written responses were submitted via the online feedback form or email. These have been included and analysed in the report and inserted in the Appendices. This excludes written responses from stakeholders.

Overall profile of respondents

A full breakdown of respondent types (across the online and face to face surveys) is provided in the chart below.

Figure 3: Respondent profile to consultation (by group) (n=1,861)



Reporting conventions

Owing to the rounding of numbers, percentages displayed visually on graphs or charts in the report may not always add up to 100% and may differ slightly when compared with the text. The figures provided in the text should always be used. For some questions, respondents could give more than one response (multiple choice). For these questions, the percentage for each response is calculated as a percentage of the total number of respondents and therefore percentages do not usually add up to 100%.

The consultation findings are presented throughout the report as an overall figure (using combined results from the face to face and online surveys, as the principal survey tools for the consultation), and then by type of respondent (landlord/agent, privately renting tenant, resident and other) to show differing views across the borough. Results by methodology are provided in Appendix 5 (by face to face survey, and online survey methods). Responses from those living outside of Enfield are included within the overall results and provided separately in Appendix 6 (5 responses in total).

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

3. Survey results

This section of the report presents the results from the surveys, with overall results combining online and resident survey responses.

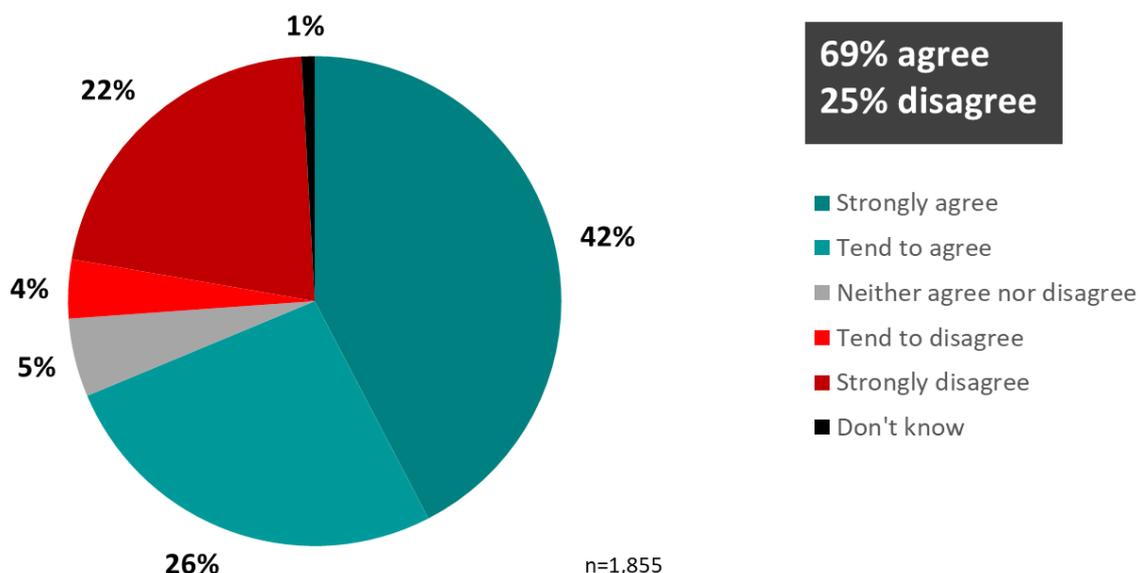
1. Views on the proposed Private Rented Property schemes

a. Proposal to introduce Selective Licensing in targeted areas

The Council is proposing to introduce a Selective Licensing scheme, which would require all privately rented properties in 14 wards of Enfield to be licensed, which are not covered by either the Mandatory Licensing scheme or the proposed Additional Licensing scheme (which cover Houses in Multiple Occupation (HMOs)). These would be in two designations, with 13 wards in one designation (Bowes, Edmonton Green, Enfield Highway, Enfield Lock, Haselbury, Jubilee, Lower Edmonton, Palmers Green, Ponders End, Southbury, Southgate Green, Turkey Street and Upper Edmonton); and Chase ward in another designation.

Overall, around seven out of ten respondents (69%) agree with the proposal for Selective Licensing, with 42% strongly agreeing. A quarter (25%) disagree.

Figure 4: Levels of support for introducing a Selective Licensing scheme (overall) (n=1,855)



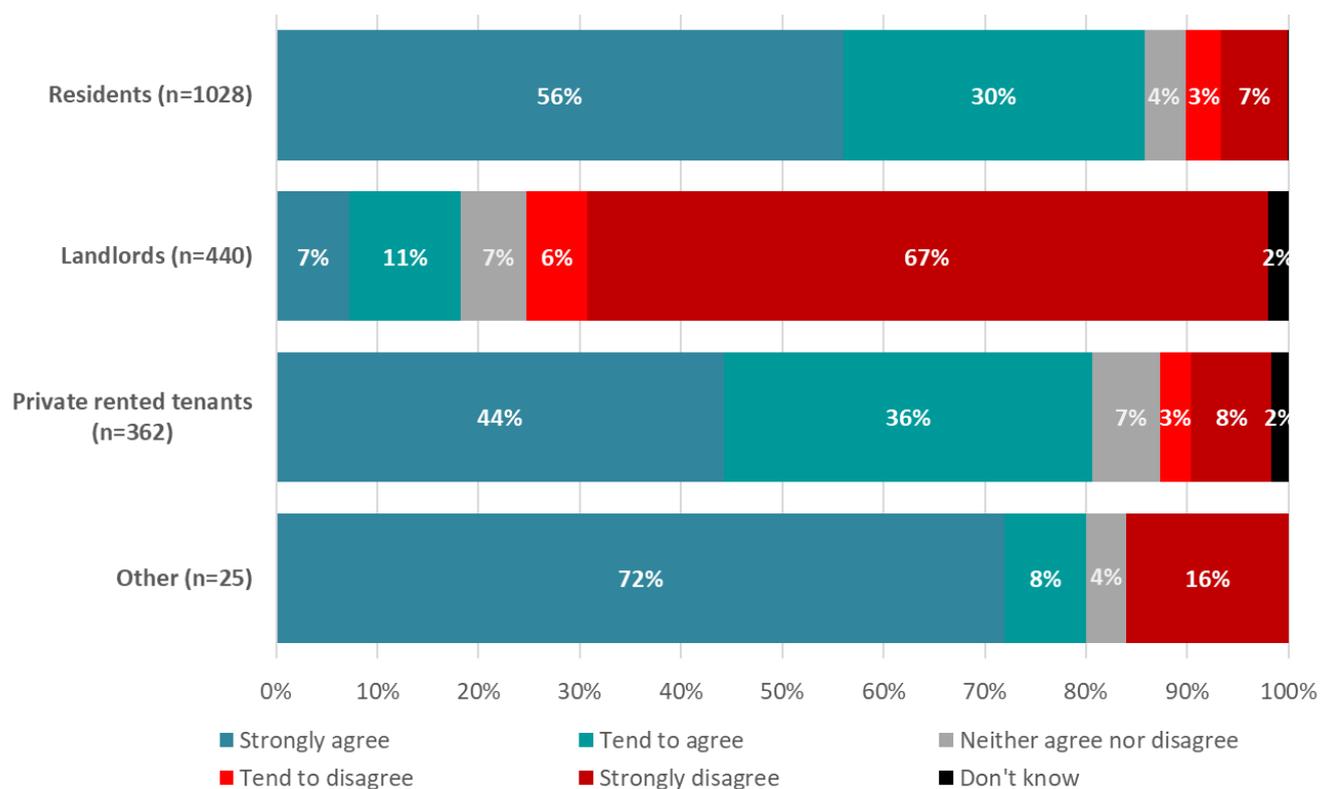
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- Residents are more strongly in favour of the proposal than other groups, with 86% agreeing;

- Private rented tenants and 'other' respondents are also in favour, with over eight out of ten agreeing (81% and 80% respectively);
- Landlords are most strongly opposed to the proposal, with around three quarters (73%) disagreeing. This is 17% points higher than for Additional Licensing.

Figure 5: Levels of support for introducing a Selective Licensing scheme (by group)



NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

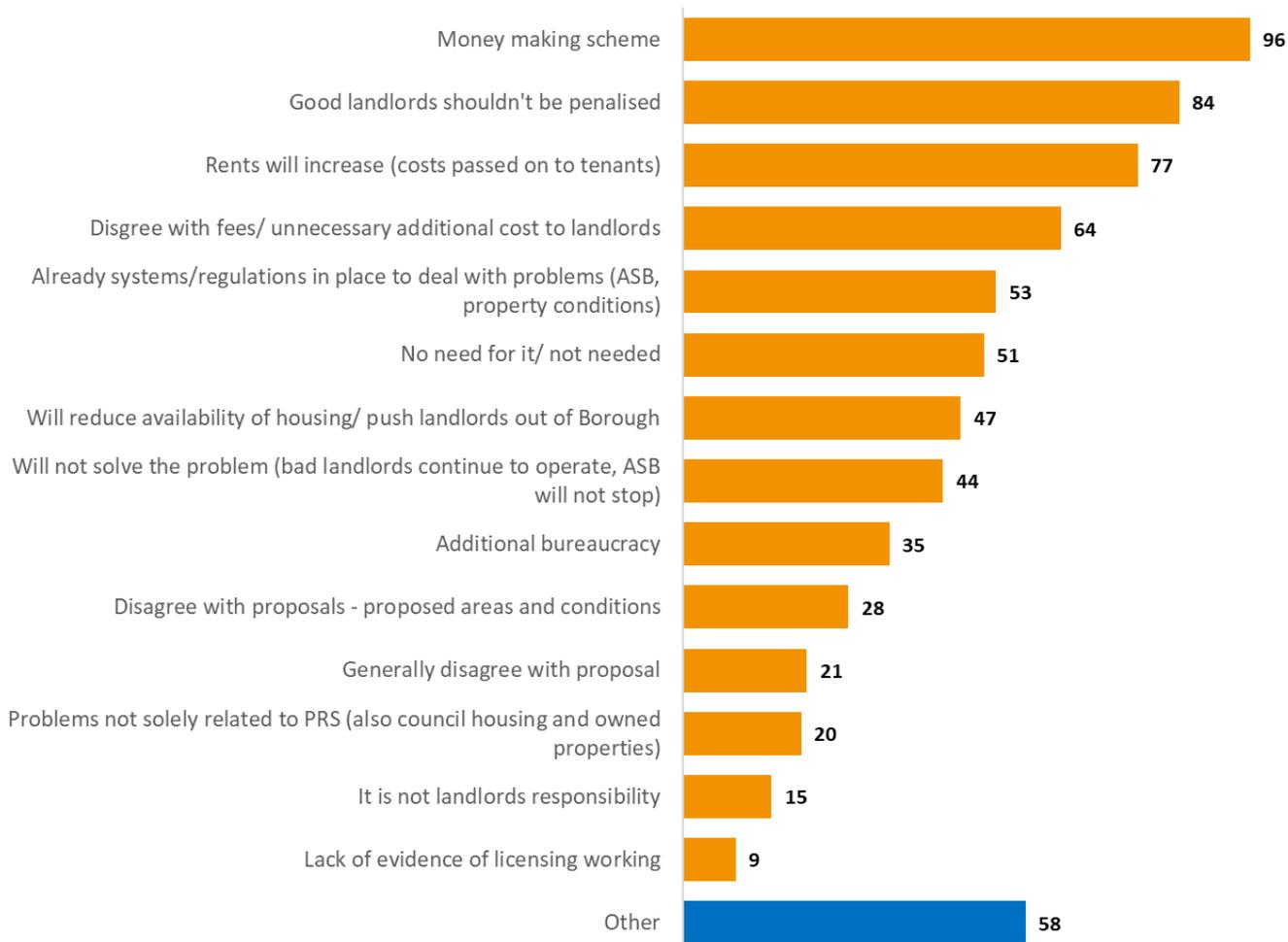
Reasons for opposing a Selective Licensing scheme

Respondents who said they disagreed with the proposed Selective Licensing scheme were asked to give their reasons. For all free text responses throughout the report, each response was looked at coded into one or more 'theme'. Comments that were not relevant to the question were excluded from the analysis. In total, 702 comments were identified and coded into key themes, from 400 respondents. 535 comments were from 286 landlords, 119 comments from 77 residents, 29 comments from 29 private rented tenants and 10 comments from 8 'other' respondents. Themes which received fewer than 5 comments were grouped under 'other'.

Key themes for opposing the Selective Licensing proposal are that they feel it is a **money-making scheme** (96 comments), **rents will increase** (costs passed onto tenants) (84 comments), and that **good**

landlords shouldn't be penalised (also 77 comments). The chart below shows all themes with the number of comments received.

Figure 6: Reasons for not supporting Selective Licensing scheme proposals (no of comments coded by theme)



(702 comments)

When we look at the top reason given by group, we find that both residents and private rented tenants feel that rents will increase (costs will be passed onto tenants). The number of comments is provided in brackets.

Table 6: Top reason for not supporting Selective Licensing scheme proposal (by group)

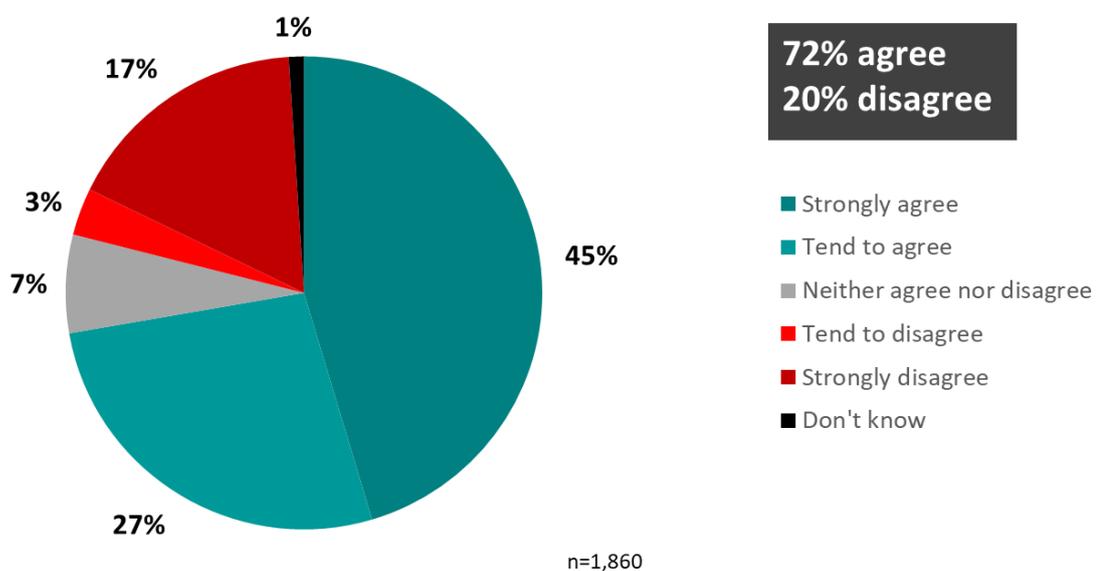
Residents	Landlords	Private rented tenants
Rents will increase (costs passed onto tenants) (19)	Money-making scheme (78)	Rents will increase (costs passed onto tenants) (14)

b. Proposal to introduce Additional Licensing across the borough

The Council is also proposing to introduce a borough-wide Additional Licensing scheme, which would require all Houses in Multiple Occupation (HMOs) to be licensed that do not fall under the Mandatory Licensing scheme.

Overall, seven out of ten respondents (72%) agree with the proposal for Additional Licensing, with a fifth (20%) disagreeing. Just under half (45%) strongly agree with the proposal. Support is slightly higher (3%) than for Selective Licensing.

Figure 7: Support for introducing a borough-wide Additional Licensing scheme (overall) (n=1,860)

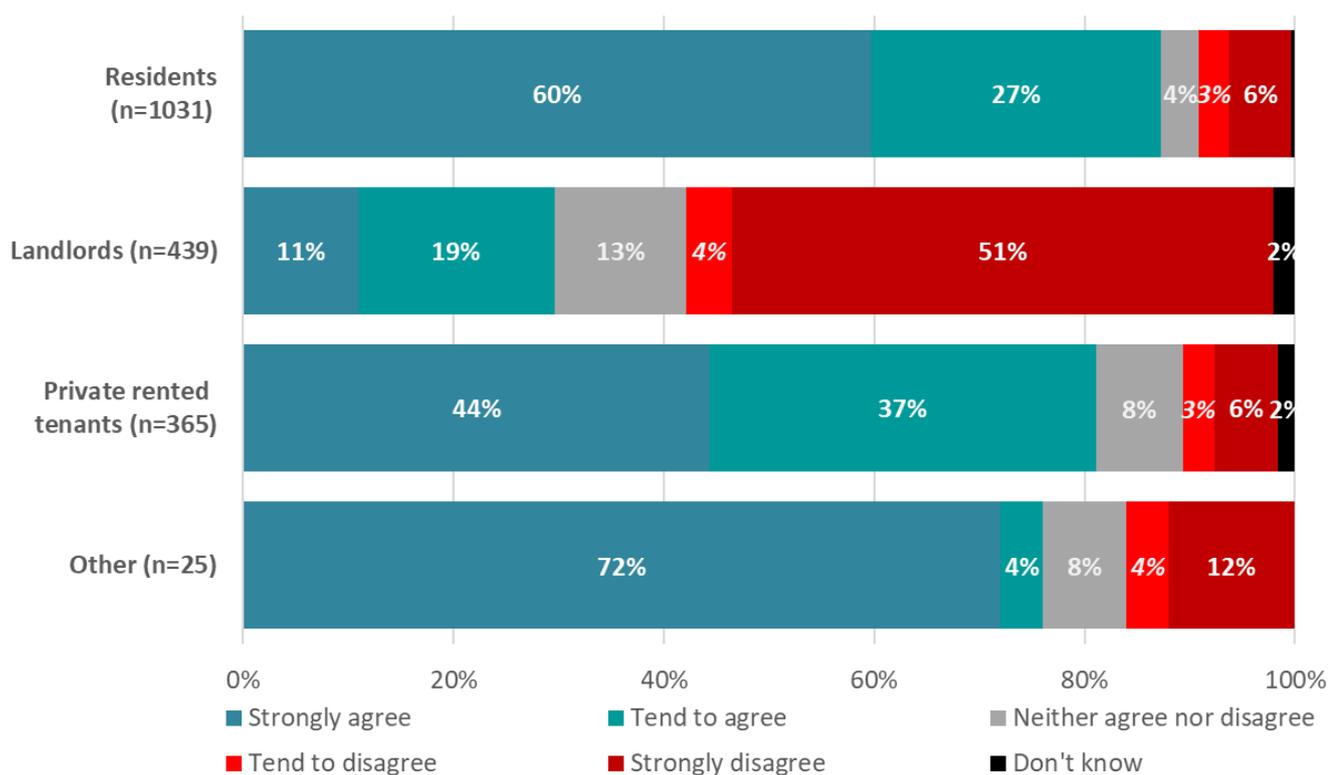


NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- Residents are again more strongly in favour of the proposal than other groups, with 87% agreeing;
- Private rented tenants and 'other' respondents are also in favour, with 81% and 76% respectively agreeing;
- Similarly, landlords are most strongly opposed, with over half (56%) disagreeing. Three out of ten landlords (30%) agree with the proposal.

Figure 8: Support for introducing a borough-wide Additional Licensing scheme (by group)



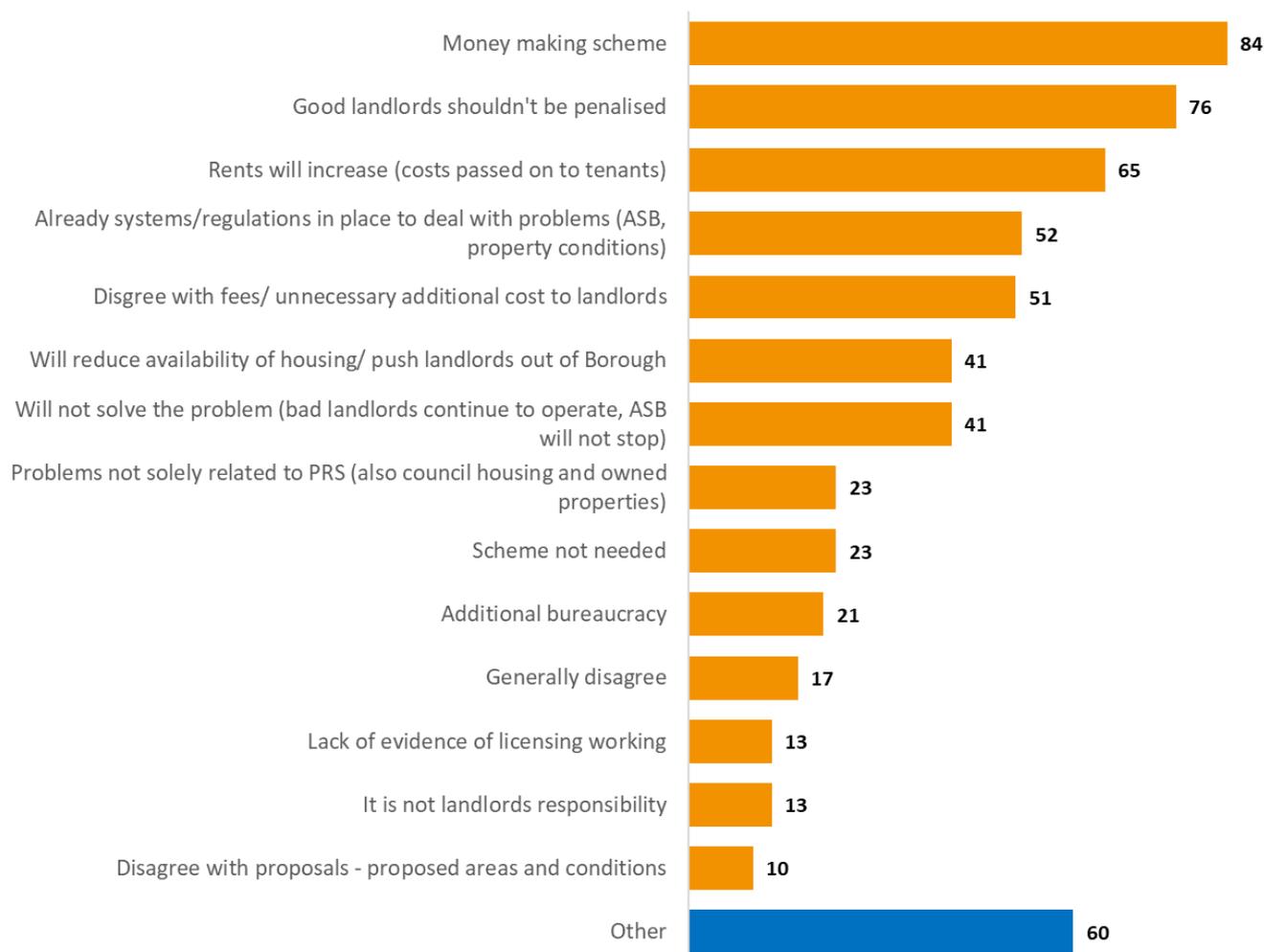
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

Reasons for opposing an Additional Licensing scheme

Respondents who said they disagreed with the proposed Additional Licensing scheme were again asked to say why they disagree. Comments that were not relevant to the question were excluded from the analysis. In total, 591 comments were identified and coded into key themes (from 330 respondents). Of these, 422 comments were identified from 218 landlords, 122 comments from 75 residents, 40 comments from 31 private rented tenants and 7 from 'other' (6 respondents). Any themes with fewer than 5 comments received were grouped under 'other'.

Key themes for opposing Additional Licensing proposals are similar to those for Selective Licensing, in that they feel it is a **money-making scheme** (84 comments), **good landlords shouldn't be penalised** (76 comments) and that **rents will increase** (costs will be passed onto tenants) (65 comments). The chart below shows all themes with the number of comments received.

Figure 9: Reasons for not supporting the introduction of Additional Licensing (no of comments coded by theme) (591 comments)



When we look at the top reason given by group, each have a different reason for not supporting the proposal. The number of comments is provided in brackets.

Table 7: Top reason for not supporting Additional Licensing scheme proposal (by group)

Residents	Landlords	Private rented tenants
Money making scheme (21)	Good landlords shouldn't be punished (65)	Rents will increase (costs passed onto tenants) (13)

c. Alternative suggestions for Enfield Council to consider

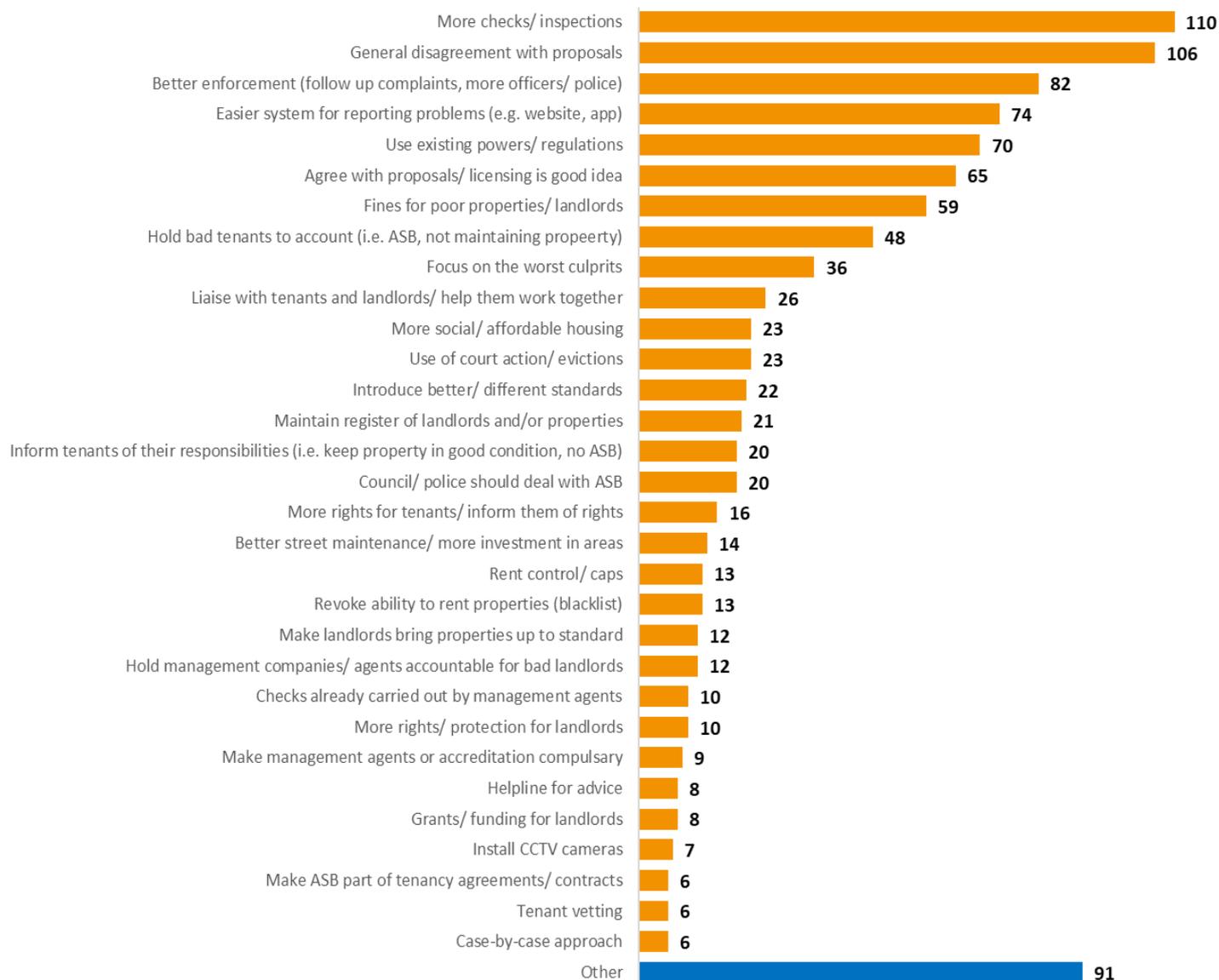
The final question in this section provided respondents with a free-text box to provide any suggestions they may have for alternative ways the Council can address poor property conditions and management, anti-social behaviour and deprivation in private rented properties in the borough.

In total, 1,046 comments have been identified and coded into themes (from 707 respondents). Any comments that were not relevant to the question were not included in this analysis. 534 comments were from 337 landlords, 335 comments from 243 residents. 136 comments from 99 private rented tenants and 41 comments from 28 'other' respondents.

Themes that receive fewer than 5 comments were put under 'Other'.

Key themes for alternative suggestions are that respondents feel the **Council should do more checks and inspections** (110 comments), they **generally disagree with the proposals** (106 comments), that **better enforcement action should be taken** (for example following up on complaints, more officers/police) (82 comments), having an **easier method for reporting problems** (such as via a website, app etc) (74 comments), or that the **Council should use their existing powers** (70 comments).

Figure 10: Ideas on alternative ways the Council can address PRS issues (no of comments coded by theme) (1,046 comments)



When we look at the top suggestion given by group, each have a different suggestion. The number of comments is provided in brackets.

Table 8: Top idea on alternative ways the Council can address PRS issues (by group)

Residents	Landlords	Private rented tenants
Agree with the proposals/licensing is a good idea (44)	Use existing powers/regulations (45)	More checks/inspections (27)

2. Views on licence conditions

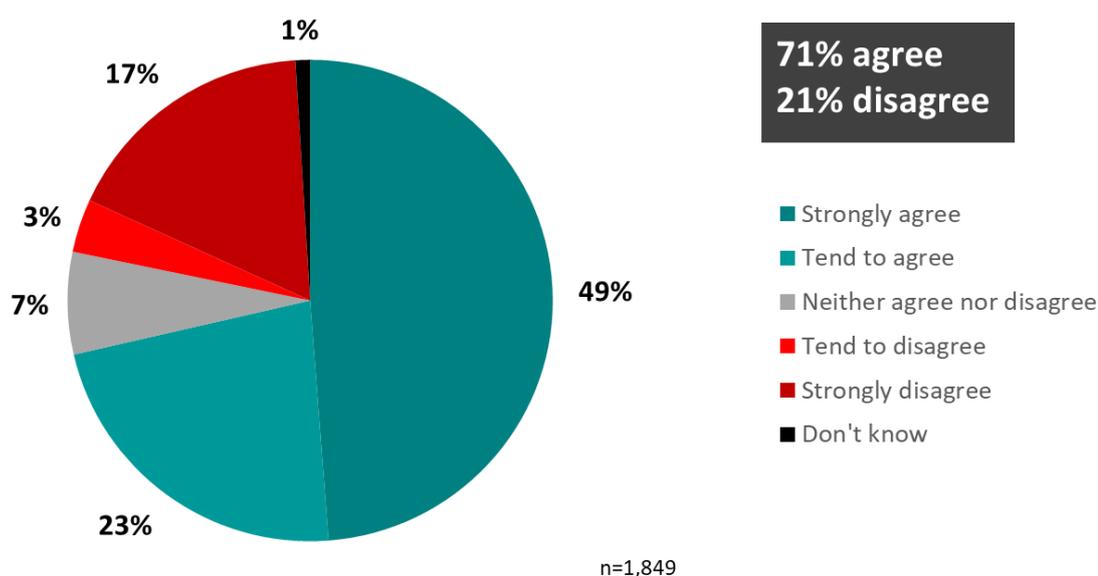
The consultation sought the views of respondents on a set of proposed licence conditions, for both Additional and Selective Licensing schemes. Links or further information about the sets of conditions were provided within the consultation documents.

a. Selective Licence conditions

Respondents were firstly asked the extent to which they agree or disagree with the Selective Licence conditions (provided as a separate document).

Overall, around seven out of ten respondents (71%) agree with the proposed Selective Licence conditions, with around half (49%) strongly agreeing with the proposal. Around a fifth (21%) disagree.

Figure 11: Do you agree or disagree with the proposed Selective Licence conditions (overall) (n=1,849)

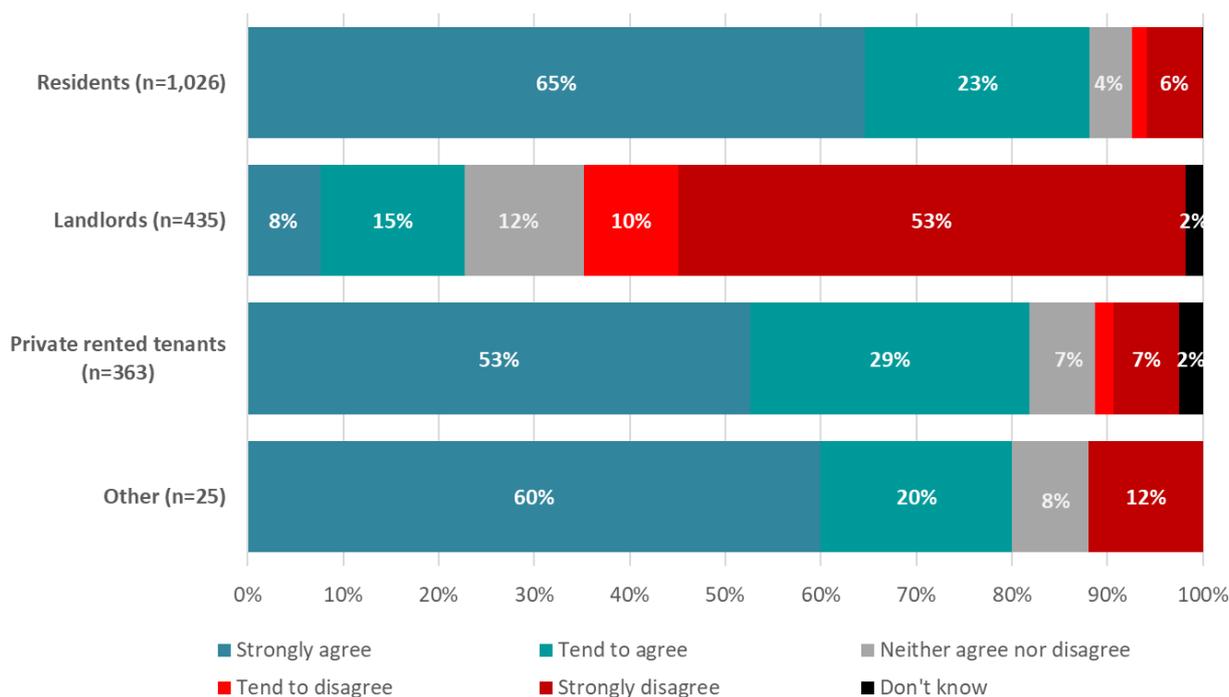


NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- Residents are the most supportive of the proposed licence conditions, with 88% agreeing;
- Private rented tenants and 'other' respondents are also supportive, with 82% and 80% respectively agreeing with the conditions. 9% of private rented tenants and 12% of 'other' respondents disagree;
- Landlords are most strongly opposed to the proposed Selective Licence conditions, with around six out of ten (63%) disagreeing. This is 9% points higher than for Additional Licensing (54% disagree). 22% agree.

Figure 12: Do you agree or disagree with the proposed Selective Licence conditions (by group)



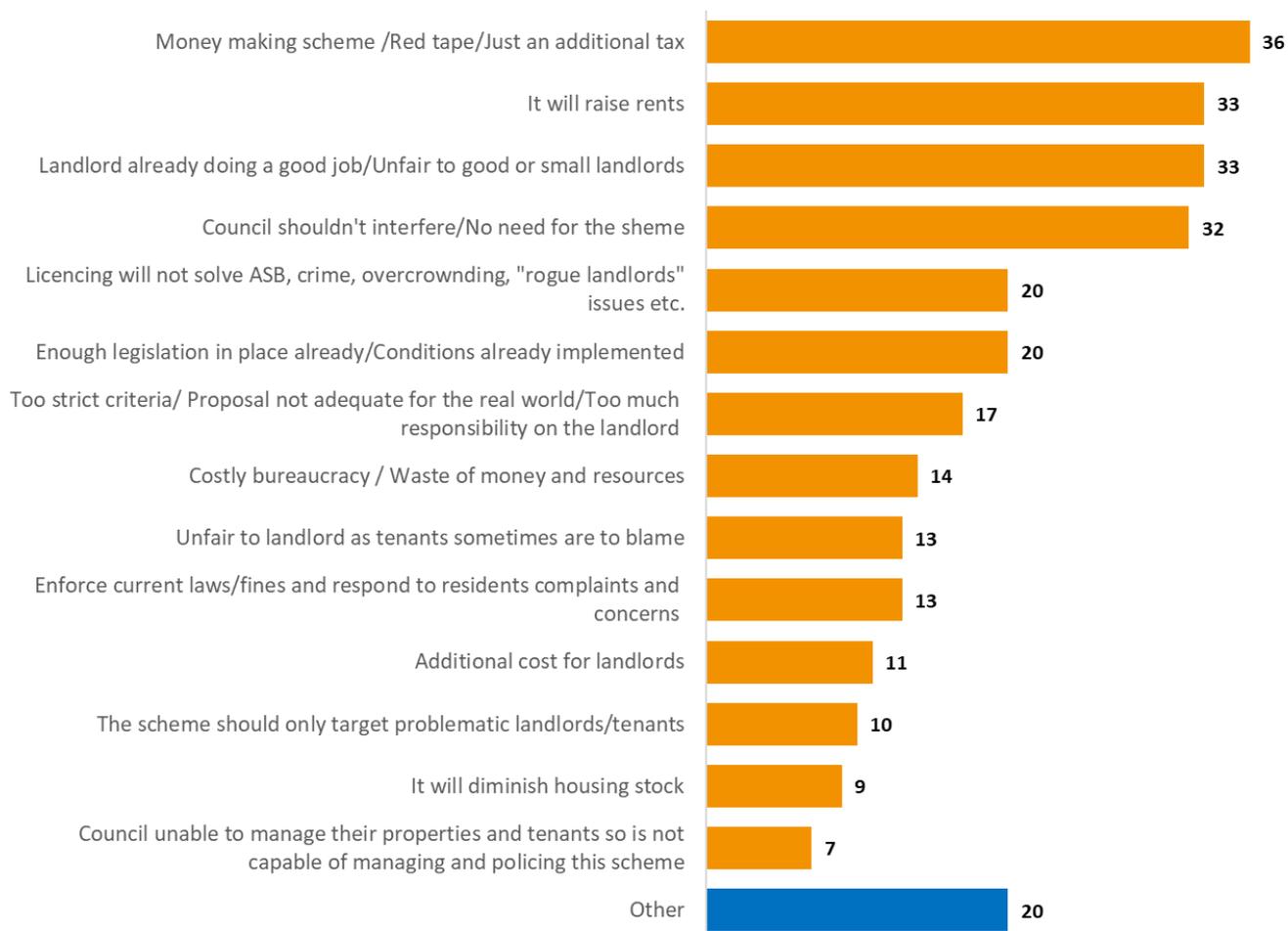
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

Reasons for disagreeing with Selective Licence conditions

Respondents who said they disagreed with the proposed Selective Licence conditions were asked to give their reasons. In total, 288 comments were identified and coded into key themes (from 193 respondents). 215 comments were from 140 landlords, 39 comments from 29 residents, 28 comments from 20 private rented tenants and 6 comments from 4 ‘other’ respondents. Themes which received fewer than 5 comments were grouped under ‘other’.

Key themes for disagreeing with the proposed Selective Licence conditions are that it is a **money-making scheme/tax** (36 comments), that it will **raise rents** and that it is **unfair to good landlords** (33 comments each) and that it the **scheme is not needed/council shouldn’t interfere** (32 comments). The chart below shows all themes with the number of comments received.

Figure 13: Why do respondents disagree with Selective Licence conditions (no of comments coded by theme) (288 comments)



When we look at the top reason given by group, each have a different reason for disagreeing with the proposed licence conditions. There are two reasons for landlords which both received 28 comments each. The number of comments is provided in brackets.

Table 9: Top reason for disagreeing with Selective Licence conditions (by group)

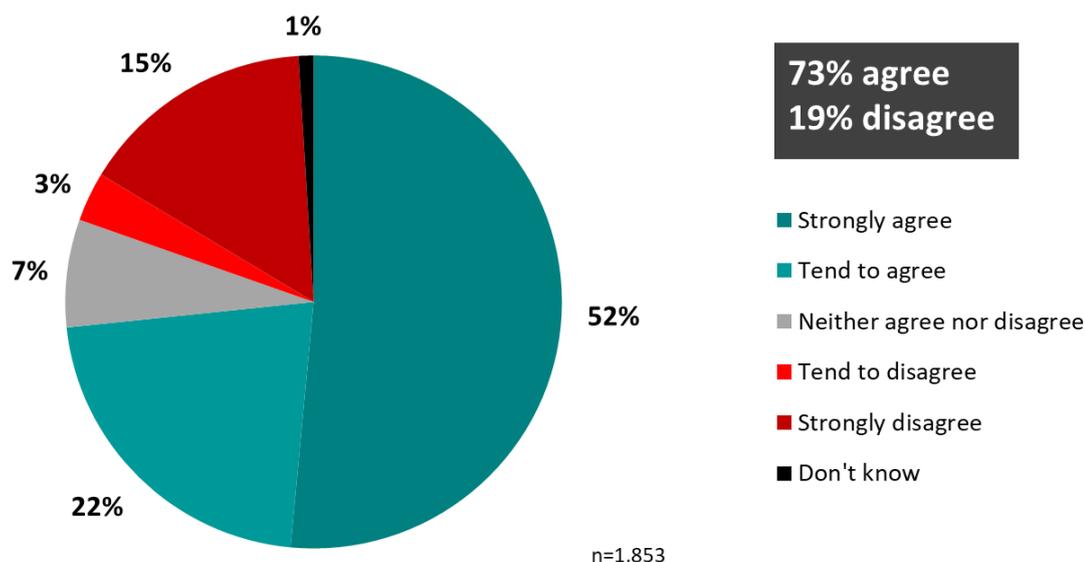
Residents	Landlords	Private rented tenants
Council shouldn't interfere/No need for the scheme (7)	Money making scheme /red tape/an additional tax <u>and</u> Landlord already doing a good job/unfair to good or small landlords (28 each)	It will raise rents (10)

b. Additional Licence conditions

Respondents were then asked to what extent they agree or disagree with the proposed Additional Licence conditions (provided in a separate document).

Overall, around three quarters of respondents (73%) agree with the proposed Additional Licensing conditions, with around half (51%) strongly agreeing. Around a fifth (19%) disagree.

Figure 14: Do you agree or disagree with the proposed Additional Licence conditions (overall) (n=1,853)

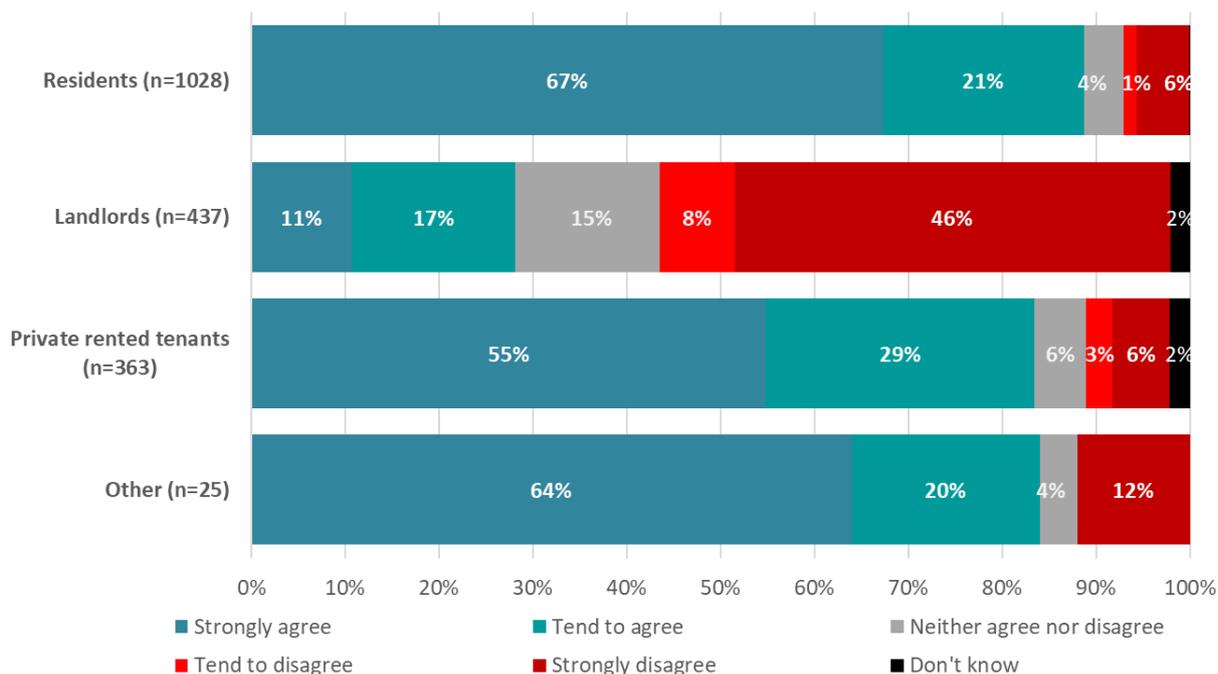


NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- Residents are again the most supportive of the proposed licence conditions, with 89% agreeing;
- Private rented tenants and 'other' respondents are also very supportive, with 83% and 84% respectively agreeing with the conditions. 9% of private rented tenants and 12% of 'other' respondents disagree;
- Landlords are again most strongly opposed to the proposed licence conditions, with over half (54%) disagreeing. Just over a quarter (28%) agree with the proposed conditions.

Figure 15: Do you agree or disagree with the proposed Additional Licence conditions (by group)



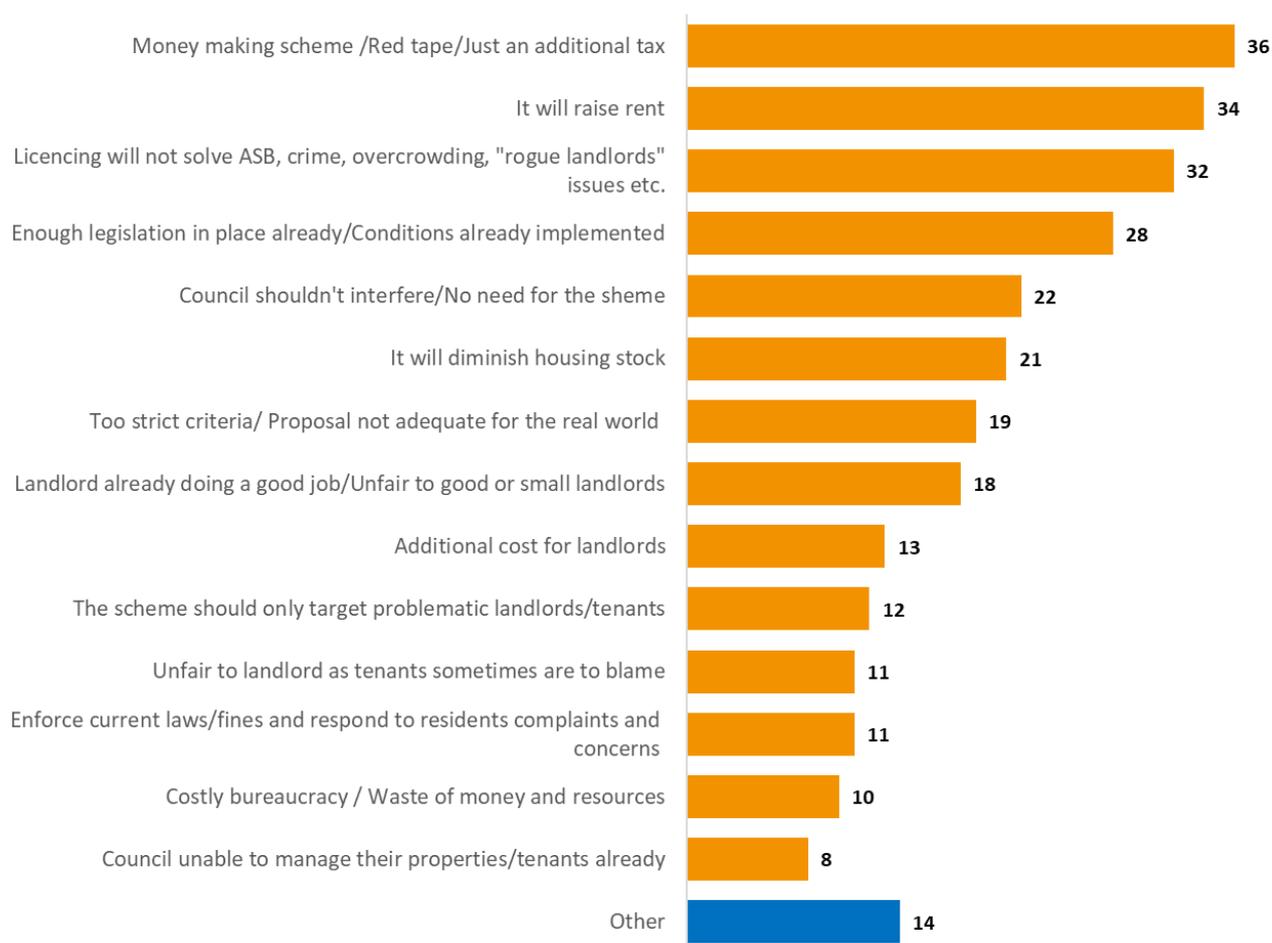
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

Reasons for disagreeing with Additional Licence conditions

Respondents who said they disagreed with the proposed Additional Licence conditions were asked to give their reasons. In total, 289 comments were identified and coded into key themes (from 191 respondents). 208 comments were from 139 landlords, 44 comments from 29 residents, 33 comments from 23 private rented tenants and 4 comments from 3 ‘other’ respondents. Themes which received fewer than 5 comments were grouped under ‘other’.

Key themes for disagreeing with proposed Additional Licence conditions are that respondents feel it is a **money making scheme/tax** (36 comments), it will **raise rents (and pass onto tenants)** (34 comments), and that **licensing will not solve these problems** (such as ASB, crime, overcrowding, rogue landlords etc) (32 comments). The chart below shows all themes with the number of comments received.

Figure 16: Why do respondents disagree with Additional Licence conditions (no of comments coded by theme) (289 comments)



When we look at the top reason given by group, both residents and landlords feel that it is a money-making scheme, whilst private rented tenants feel it will raise rents. The number of comments is provided in brackets.

Table 10:Top reason for disagreeing with Additional Licence conditions (by group)

Residents	Landlords	Private rented tenants
Money making scheme /red tape/ additional tax (7)	Money making scheme /red tape/ additional tax (25)	It will raise rents (12)

3. Views on proposed licence fees

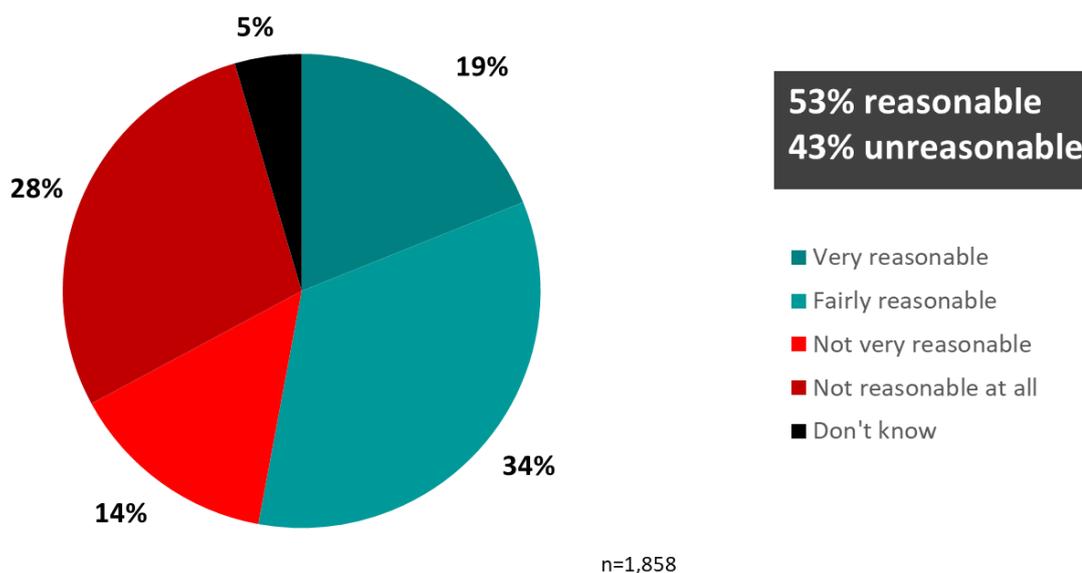
The consultation also sought views on the proposed licence fees for Selective Licensing and Additional Licensing. Links to documents or further information about the fees were provided within the consultation documentation.

a. Selective Licence fees

Respondents were firstly asked how reasonable they feel the proposed fees for a Selective Licensing scheme of £600 for a five-year licence.

Overall, over half (53%) feel they are reasonable, with around a third (34%) saying they are fairly reasonable. However, around four out of ten (43%) feel they are not reasonable, with 28% saying they are not reasonable at all.

Figure 17: How reasonable is the proposed Selective Licence fee? (overall) (n=1,858)



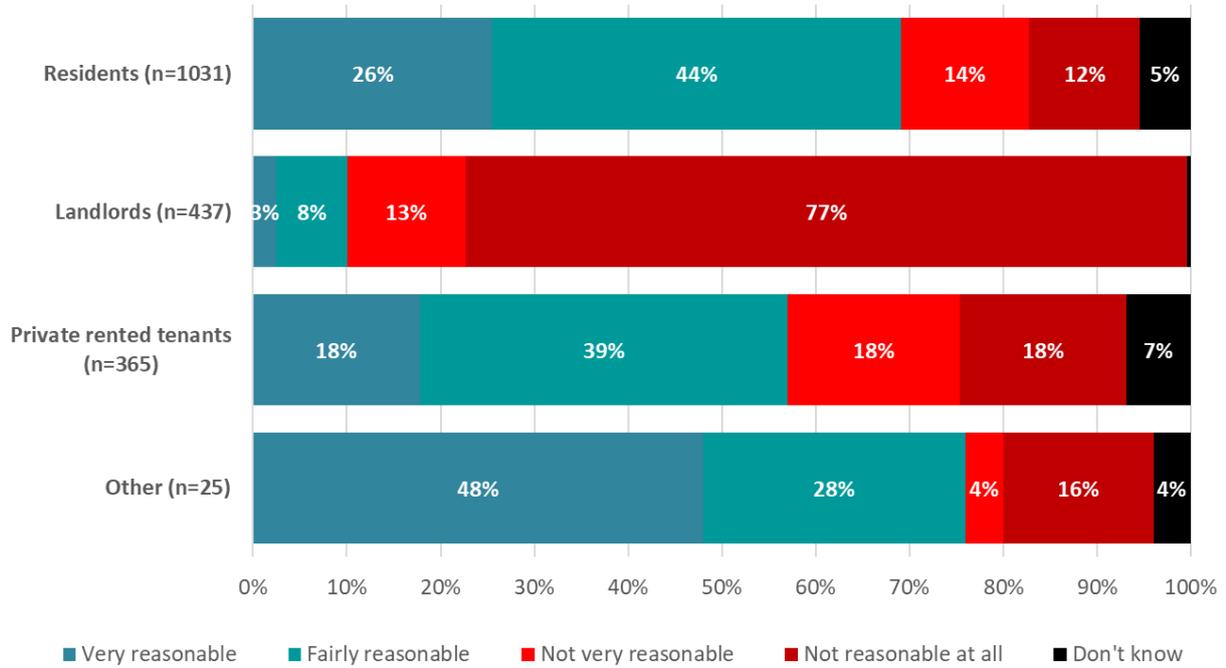
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- 'Other' respondents are most supportive of the proposed fees, with three quarters (76%) saying they are reasonable;
- Residents are also supportive, with around seven out of ten (69%) saying they are reasonable;
- Results for Selective Licence fees are the same for private rented tenants as they are for Additional Licence fees, with 57% saying they are reasonable and 36% not reasonable;

- Landlords are most strongly opposed to the proposed fees, with almost nine out of ten (89%) saying they are not reasonable. This is 5% points higher than for Additional Licence fees (84% not reasonable). Only one in ten (10%) feel they are reasonable.

Figure 18: How reasonable is the proposed Selective Licence fee? (by group)



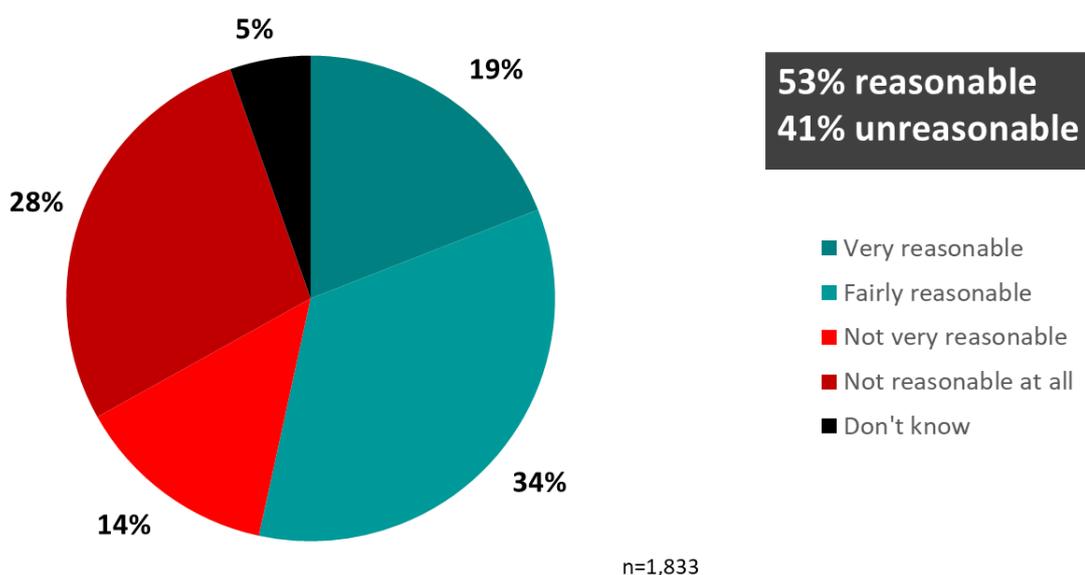
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

b. Additional Licence fees

Respondents were asked how reasonable they feel the proposed fees for an Additional Licensing scheme of £900 for a five-year licence.

Overall, results are fairly similar to views on the Selective Licence fees, with over half of respondents (53%) saying the proposed Additional Licence fees are reasonable, with a third (34%) feeling they are fairly reasonable. Four out of ten (41%) feel they are not reasonable, with almost three out of ten (28%) saying they are not reasonable at all.

Figure 19: How reasonable is the proposed Additional Licence fee? (overall) (n=1,833)

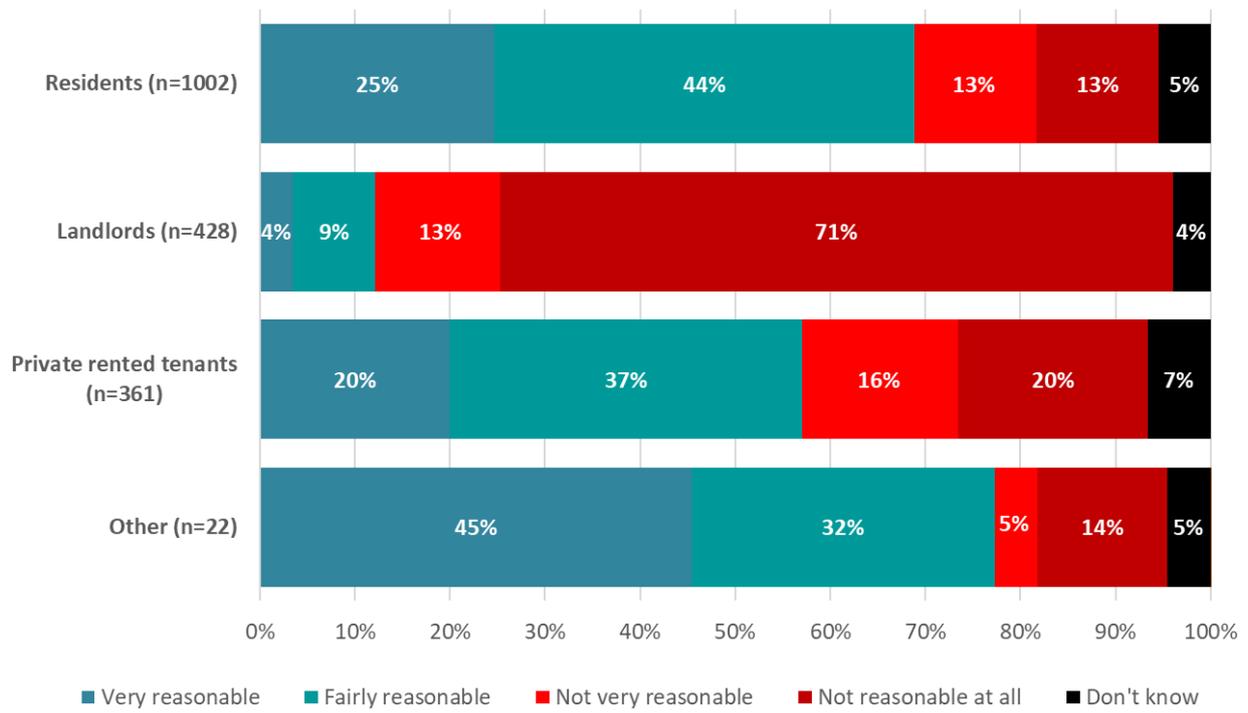


NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

When we look at responses by group, we can see the following differences:

- Again, we see 'other' respondents most supportive of the proposed fees, with around three quarters (77%) saying they are reasonable;
- Residents are also supportive, with around seven out of ten (69%) saying they are reasonable;
- Although a relatively high proportion of private rented tenants feel fees are reasonable (57%), a higher proportion feel they are not reasonable (36%), compared to residents and 'other' respondents.
- Again, landlords are most strongly opposed to the proposed fees, with 84% saying they are not reasonable. Around one in ten (12%) feel they are reasonable.

Figure 20: How reasonable is the proposed Additional Licence fee? (by group)



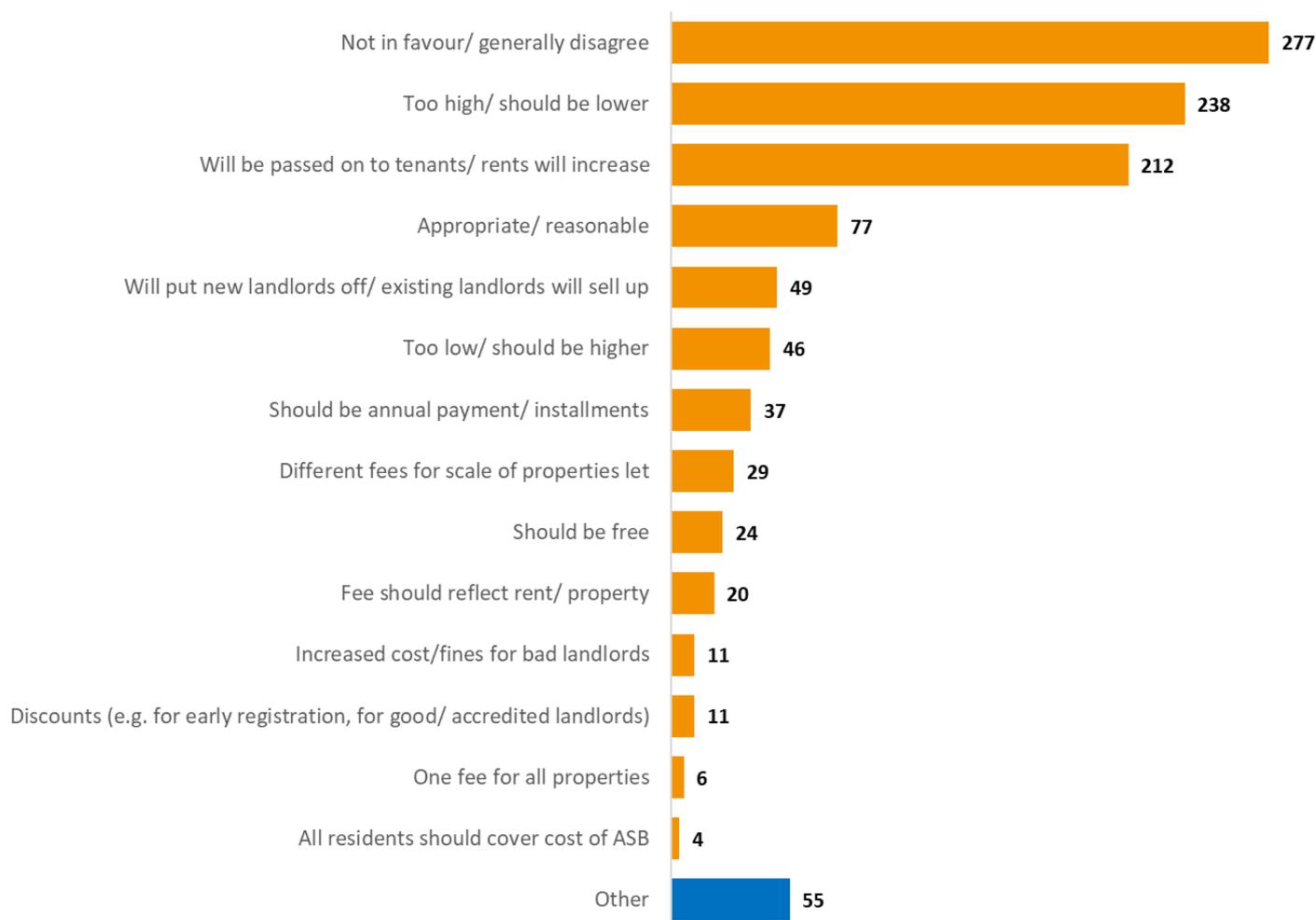
NB. Due to the rounding of numbers, % may not add up to 100%. Please refer to the % in the text.

c. Comments on Licence fees

All respondents were invited to provide any other comments they had around the proposed licence fees for Additional or Selective Licensing. Comments that were not related to the question were removed. In total, 1,096 comments were provided which have been coded into common themes (from 899 respondents). 444 comments were from 390 residents, 435 comments were from 324 landlords, 193 comments from 166+ private rented tenants and 24 comments from 19 'other' respondents.

These show a mixture of positive and negative views, along with some suggestions for the Council to consider, regarding fees. All themes are presented in the graph below. The most frequent comments were that respondents **generally disagree with/not supportive of the fees** (277 comments). This was followed by feeling that **fees are too high** (238 comments) and concerns that the **fees will be passed onto tenants** (i.e. rents will increase) (212 comments). Other themes received notably lower comments from respondents.

Figure 21: Comments on licence fees (no of comments coded by theme) (1,096 comments)



When we look at the top comment given by group, both residents and landlords feel that it is a money-making scheme, whilst private rented tenants feel it will raise rents. The number of comments is provided in brackets.

Table 11: Top comment on licence fees (by group)

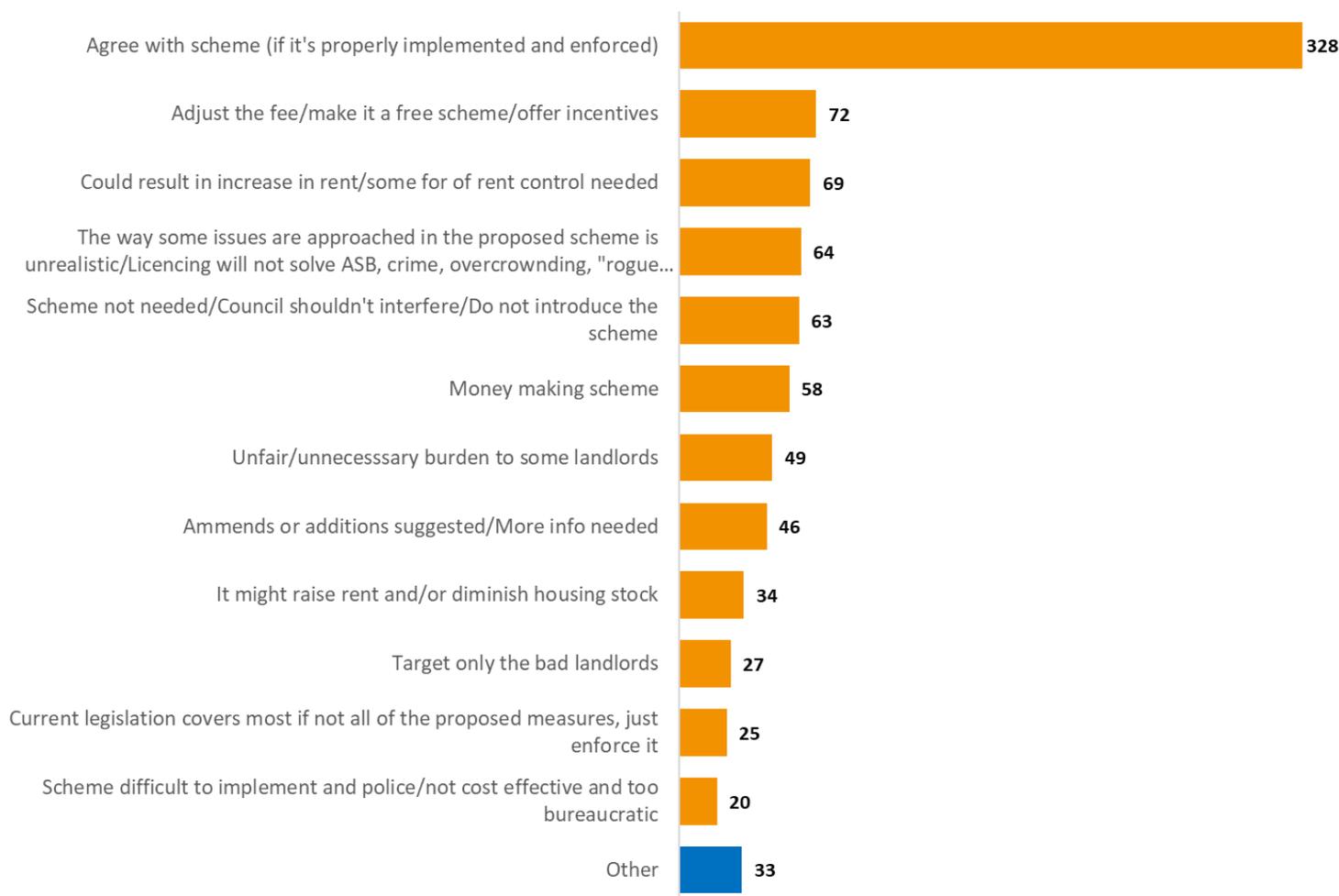
Residents	Landlords	Private rented tenants
Fees too high – should be lower (103)	Not in favour/ generally disagree (170)	Will be passed on to tenants/ rents will increase (84)

4. Any other comments about the proposed schemes

Finally, respondents were invited to add any further comments they would like to make about the proposed licensing schemes. In total, 888 relevant comments were analysed and coded by theme (from 681 comments). 397 comments were from 353 residents, 312 comments were from 188 landlords, 164 comments from 126 private rented tenants and 15 comments from 14 'other' respondents. Where fewer than 5 comments were made, these were included in 'other'. All key themes are presented in the chart below.

The most common comment by far was that respondents **generally agree with the proposed schemes** (if they are properly implemented/enforced) (328 comments). This is followed by comments saying that the **fees should be different** (72 comments), with some saying incentives should be offered and others saying they should be free. 69 comments were around a concern that **licence fees would be passed onto tenants** via raised rents.

Figure 22: Further comments on the proposed licensing schemes (no of comments by theme) (681 comments)



When we look at the top comment given by group, both residents and private rented tenants agree with the scheme (as long as its properly implemented and enforced), whilst landlords feel that the scheme is not needed, and the Council shouldn't interfere.

Table 12: Top comment on proposed licencing schemes (by group)

Residents	Landlords	Private rented tenants
Agree with scheme (if it's properly implemented and enforced) (236)	Scheme not needed/Council shouldn't interfere/do not introduce the scheme (40)	Agree with scheme (if it's properly implemented and enforced) (67)

4. Stakeholder views

This section draws together the headline findings from the stakeholder interviews. In total, 10 stakeholders responded to the consultation invitation, either by telephone interviews or a written response. Comments have analysed and grouped into themes. These are presented below.

Key themes

Support or oppose proposed schemes

In general, public and third sector stakeholders were largely in support of both proposals. More so Additional Licensing than Selective Licensing. Several said that landlords often don't know what they should be doing, and licensing would make sure that they are clear about what standards they need to meet. All landlords/letting agents associations were opposed to the proposals, with some recognising that in the current financial climate, the Council is limited in resources and licensing can therefore provide funding.

Need to regulate the private rented sector

Almost all public/third sector stakeholders' welcome regulation of private rented housing sector. Many feel that there are most definitely issues with housing in this area, HMOs, which tend to house people on lower incomes and those who are more vulnerable and more open to exploitation. Landlords/letting agents associations, on the other hand, feel that the Council already has a whole raft of powers already at their disposal which are to be used to regulate the sector. Most stakeholders working in the third sector felt that tenants will be more likely to report things that they are currently not doing if licensing was brought in, as they would be able to find out whether their home should be licensed or not. However, some do fear eviction if they complain so the council should find a way for tenants to report issues privately.

Landlords' accountability for tenants

There is a mixture of views here, with some feeling that landlords should be more accountable for their properties and their tenants, whilst others feel that they cannot be accountable for the actions of other people. Again, the split in views is largely between public/third sector stakeholders and landlord/letting agent associations. Several said that landlords should ensure that tenants look after the properties in terms of rubbish and ASB, as they feel that some landlords turn a blind eye to what their tenants are doing and leave them completely to their own devices. However, others stated that ASB is a criminal offence and should just be left to the police to deal with and landlords cannot be held to account. In terms of rubbish, landlord/letting agent associations were against landlords doing anything other than

letting tenants know what is expected of them, but should not go any further than that, as they do not have the powers to do so.

Licensing schemes' scale

Again, views were divided here on the scale of the scheme. Some of the public/third sector stakeholders felt that the schemes should both be borough-wide to ensure that there is little to confuse landlords and tenants about which types of properties and in which wards different schemes apply. One stakeholder felt that wards are not a great way to define boundaries for any scheme because in many, some parts of a road are in one ward and other parts in another. Also, one side of the street may be in one ward and the other side in another.

Others felt that unscrupulous landlords could try to move their businesses into other wards where licensing is not in place, therefore borough-wide schemes would restrict their options of displacing the problem elsewhere within Enfield or neighbouring authorities without licensing.

Landlord/letting agent associations and a few other public/third sector stakeholders were of the view that both schemes proposed are too large for the Council to have a realistic chance of having any impact, and they should really start smaller (although landlord/letting agent associations are in principal opposed licensing schemes). A few suggested that the Council should have more of a gradual or rolling approach, starting with between 1-3 wards at a time and then introducing another 1-3 wards once it's working properly (a few years down the line) and the Council is certain that it is having the desired impact.

Fees and discounts

Most stakeholders felt that the fees themselves were relatively reasonable. Several felt that there should be some levels of discounts, such as early bird discount, as this would be an incentive for many to get their applications in early. The landlord/letting agent associations felt there should be a discount for those already in some form of accredited scheme or use managing agents in a scheme, as they should have most of the checks and paperwork in place.

Costs passed to tenants

Almost all stakeholders said they were concerned about where the costs for licensing would end up. Many felt that these could potentially be passed onto tenants, via increases in rent. Some felt that landlords may not be able to do this due to market forces dictating what rent can be charged in the area.

One questioned whether an Article 4 directive for planning was also going to be introduced at the same time, as this would most definitely push rents up and not necessarily standards, as the market will be limited. One third sector stakeholder said that tenants they had spoken to are concerned about costs being passed onto them.

Concern about other negative effect on tenants (such as homelessness)

Many stakeholders highlighted concerns about possible consequences of licensing schemes, which could see people made homeless, either as a result of landlords selling up, evicting tenants or if rents are increased and some people are no longer able to afford to pay their rent, particularly those who are on benefits/low income. One felt that if evictions/homelessness rates go up, this could have the opposite desired effect and put an even greater burden on public services and public money.

Licence conditions

Most comments around specific licence conditions were from landlord/letting agent associations. Some felt that the licence conditions were not appropriate, or they needed further consideration. Most of the landlord/letting agent associations highlighted that Selective Licensing cannot include any conditions on the property conditions but can only focus on management standards. Specific conditions were highlighted as being a cause for concern. These include

- 2.3 around the tenancy deposit scheme (one felt this is incorrect);
- 3.5 – two stakeholders felt that this cannot be included for Selective Licensing as it is about property conditions;
- 3.11 around Fire Safety;
- 4.1- one was not sure how landlords could enforce this, and that the Council should be more practical about what landlords can do and cannot;
- 7.2 one questioned whether it is lawful to ask for names/addresses of children living in a property;
- 8.2 around council tax – one felt that this may not reflect council tax legislation.

Scheme management and enforcement

Almost all stakeholders said that the licence schemes will only be impactful if it is enforced and the Council acts against landlords who do not comply. Without this it would only be a paper exercise and result in little changes being seen in terms of property conditions and management standards.

Evidence base questions

A few the landlord/agent associations questioned the evidence base that the proposals are based on. This was particularly directed at whether the evidence for the private rented sector contains properties

covered by the mandatory licensing scheme (i.e. HMOs with 5 or more people from 2 or more households). Other questions around the evidence base include what time period the data is based on.

Implementation concerns

Many of those interviewed said that it was unclear how the schemes would be rolled out and had concerns about the resourcing of these schemes. Most landlord /letting agent associations said that other schemes have been extremely under-resourced and if levels of staffing are insufficient then the council could be swamped in dealing with the application paperwork, rather than any inspections and enforcement etc... Examples of other schemes where this has happened were given, such as Liverpool and Nottingham.

Monitoring and evaluating the effectiveness of the scheme

A few landlord/letting agent associations felt that the Council's objectives should be reviewed, and specific numbers put on targets rather than percentages, to make them more transparent and measurable. Suggestions included things like a target number of properties they want to licence and inspect. They also felt that the Council should be transparent on what the scheme is achieving, if it were to go ahead, such as reporting on the number of properties it has licenced, how long it takes on average for a licence to be granted, the number of enforcement actions taken etc.. One felt that there should be some form of annual report on the scheme, which would help provide transparency and let others see whether the scheme is having a positive impact, and that could help landlords be more receptive of licensing.

Other approaches to improve private rented sector

Other suggestions around what the Council could consider, either as an alternative or addition to licensing, include the following:

Delivery partners

One alternative suggested would be to use a delivery partner, whereby the council can then concentrate on the issues they are looking to tackle like sub-standard housing and overcrowding etc and get a partner to do the paperwork elements.

Co-regulation

Several stakeholders felt that co-regulation would be a better approach such as in Liverpool. Here, ARLA members got a 50% discount and ARLA did the admin/processing for their members. This helps to remove some of the administrative burden on the Council.

Collaborative partnership with other agencies

Another suggestion was that there could be a collaborative approach with partners/other schemes, such as the London Rental Standard or for ASB Homestamp in the West Midlands, where the council is working as part of a multi-agency approach to tackle and resolve the issues.

Other queries/comments

Other queries and comments included things like the schemes causing confusion between what type of licence landlords would need in the areas where Selective Licensing has been proposed (such as some properties within the same block falling under different schemes).

5. Public meetings/written responses

M·E·L Research facilitated four public consultation meetings in Enfield during the consultation period, in Enfield Town and Edmonton Green. Two events were targeted specifically at landlords and agents, and two were targeted specifically at residents and private renting tenants. However, the latter groups tended to have a mixture of residents and landlords. The table below shows the meetings, audience and number of attendees per meeting.

Table 13: Public meetings information

Date/time of meeting	Target audience	Venue	Approx. no of attendees
30 September (7-9pm)	Landlords/agents	Dugdale Centre, Enfield	98
7 October (7-9pm)	Private rented tenants/residents	Dugdale Centre, Enfield	36
30 October (9.30-11.30am)	Private rented tenants/residents	Green Towers, Edmonton	23
30 October (7-9pm)	Landlords/agents	Green Towers, Edmonton	84
TOTAL	-	-	241

In total, there were 241 attendees across the four meetings and 35 written responses submitted (via email or feedback form). Most of these attendees were landlords, therefore many of the comments were from this group and many fewer from other groups. It should be noted that Council Officers were present at every meeting and that most of the sessions were taken up by a Question and Answer session following on from a presentation about the proposals. During each public meeting, Council Officers attempted to address all questions posed by attendees or directed them to the consultation documents for further information (often when there were specific questions about the proposed licence conditions, fees etc). The Frequently Asked Questions document and consultation pages were checked, updated and republished after most meetings to address some of the most common questions highlighted.

Below is a summary of the key themes that came out from both the written responses and the feedback from the public meetings.

Landlords' accountability for tenants' behaviour

Many of the comments across all four meetings were around tenants' behaviour and the focus on ASB and rubbish/litter problems from private rented properties, and how landlords were being held accountable for these issues. Several landlords said that they felt the responsibility to deal with these issues like ASB was being passed down to landlords, when they should be dealt with by other

organisations. There were concerns about how far the Council was going to go with this, as landlords often attempt to speak to their tenants about issues such as rubbish, but they are effectively powerless to do anything other than this. Landlords shared examples about negative experiences they have had with difficult tenants and how hard and costly it had been to deal with these issues. This was echoed in several written responses which detailed problems the landlord had with tenants and that they had little support in dealing with them from any organisation. Many felt that the balance of power is much more heavily weighted towards tenants' rights compared to landlords' rights over their own properties, and that licensing was another step in this direction.

However, a small number of residents also shared their experiences of landlords letting houses get run down and being inadequate, not dealing with issues that tenants were causing such as ASB and that the Council had also not helped them deal with any of these problems.

Unnecessary/unfair tax on landlords

Again, many landlords' and agents' comments were centred around the private rented sector being penalised from all directions, and restrictions being placed on what they can and can't charge, what tax relief can be claimed and licensing being an additional financial burden on them. Some felt that landlords are effectively paying for Council staff and that the financial burdens of the Council are being passed onto them. A few comments were that this should be paid by everyone via Council Tax if this is for the good of the Enfield community at large. Many feel that if licensing is needed, it should be free of charge and the proceeds from taking financial action against rogue landlords could pay for the scheme.

Targeting rogue landlords

Many comments/questions throughout the meetings and via submitted feedback, particularly from landlords, were around why the Council is not targeting 'rogue' landlords, rather than having a blanket approach. Comments centre on the fact that there are only a very tiny proportion of rogue landlords and that many landlords, do not fall under this category. Many landlords felt that unlicensed – rather than licensed – landlords will continue to be the problem, still operating under the radar and evading their duties. There were also questions from different groups about how the Council intends to target and find rogue landlords, if they currently can't deal with them.

Enforcement powers already available to Council

Many landlords said during the public meetings and via feedback forms, that the Council already has the powers to deal with the issues they have identified and that these need to be used more effectively, rather than introducing new 'schemes' and additional costs.

Licensing scheme in practice

A number of attendees questioned how the scheme would work and what can landlords expect to get for their fee, such as when would the scheme start; how long would landlords have to apply for a licence; how many inspections is the Council proposing to make on their properties; what advice/support will they get for the fee; does the licence fee need to be paid upfront; would there be any discounts for owning several properties; will every property be inspected; what happens if the makeup of the tenants changes from year to year – would they need a different licence each time; how does planning come into this; how would tenants report bad landlords; can there be a tenants blacklist if there is going to be a landlords list?

Evidence base for licensing proposals

There were several questions around the evidence base, where the information has been pulled from and the statistical model used. A number of queries were raised about how data can be attributed specifically to private rented properties, as many are next door to owner occupied properties, social housing etc. There were also queries about the time period for the data and how the figures are being compared to the overall population or the private rented sector population in the borough. There were also a few questions posed about how licensing fits alongside other strategies and delivery teams, such as homeless strategies, planning, ASB and other agencies such as the Police, Fire and Rescue etc. Some felt that it was unfair to target the areas in Selective Licensing if other areas area also demonstrating high levels of ASB etc. and that it was the poorer areas where tenants have less money that were going to be hardest hit. There were also a few comments/queries about the data being based on projections or predictions, rather than actual data, which they suggested was not therefore real evidence about the extent of the problem, but a suggestion that there was a widespread problem. A few comments/queries sent via feedback and email asked specific questions about the data used and the model used.

Evidence that licensing works

There were a few questions across the meetings about evidence that licensing works and how the Council is going to measure whether the schemes are working. There were a few challenges posed to the Council about how licensing was going to deal with some of the issues the Council was looking for the schemes to deal with, such as deprivation, which is more of a social than a housing issue.

Licence fee levels

There were mixed views about the licence fees – some felt that although they were not very high, it was a high expense to have to pay upfront. Some said that the fees were higher than in other London boroughs, whilst others felt that fees were extremely low in comparison to what profits landlords make in Enfield.

Licence fees passed onto tenants

Tenants and residents said that they were concerned that licence fees would be passed onto tenants and that licensing would increase rents. Several landlords said that they would have no choice but to pass the licence fees onto their tenants. Several comments from tenants were about how well their landlords look after them, therefore they feel licensing is unfair and that ultimately the fees will just hike up their rents so they will be worse off as a result.

Social housing/council tenants more problematic

Many felt that social housing causes a lot of problems in Enfield and that these should be looked at as a priority, before the private rented sector. There were also comments from several landlords during the meetings and via feedback forms that tenants they provided housing to were Council tenants and therefore they were vetted by the Council, as were the tenants and they still caused problems/damage.

Types of properties covered by licensing

There were several queries about whether certain types of properties or arrangements would be covered under licensing, such as if a landlord rents their property to council tenants, other housing association tenants, or to other council tenants, for example.

Appendices

Appendix 1: Maps of proposed licensing schemes

Appendix 2: Survey questions

Appendix 3: Email and written responses to consultation

Appendix 4: Stakeholder written responses to consultation

Appendix 5: Responses by methodology (face to face survey and online survey)

Appendix 6: Responses from outside of Enfield

Appendix 7: Demographic profile of respondents

Appendix 8: Communication visuals



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