

Islington Together: for a more equal future

SELECTIVE LICENSING

Public consultation on new proposals for private rented housing licensing scheme

Full Consultation Document

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1 Foreword

- 1.1 The need to secure good quality, genuinely affordable homes for our residents has never been greater. Islington Council believes that nobody should ever be without a decent roof over their heads, and we will also work to eliminate rough sleeping and support people experiencing homelessness. We want to make sure that we use our power and influence in other areas to stand up for private renters and all others in our communities to ensure equity in access to decent, safe, and affordable homes.
- 1.2 The shortage of affordable housing continues to be a real concern for Islington residents, as the nationwide housing crisis is being acutely felt in the country's inner cities. We know that this means far too many residents fall victim to rogue landlords and far too many young people being brought up in the borough are facing the reality of being unable to afford to continue to live in the communities into which they were born.
- 1.3 At a time when the demand for low-cost accommodation is high, not just in Islington, but across London and nationally, it falls upon local authorities to ensure that the standard of accommodation is of a satisfactory standard, regardless of the cost. It must be safe, not overcrowded and not impact upon the health and wellbeing of those who live in it. The accommodation should also not have an adverse impact upon the neighbourhood in which it is located, through poor visual impact caused by poor management, or the anti-social behaviour of those living in or visiting the accommodation.
- 1.4 The private rented sector in Islington is significant, with around 30% of the housing stock being privately rented¹. The evidence we have gathered demonstrates that, although many privately rented properties are perfectly satisfactory and landlords and tenants behave responsibly, there is a significant amount of privately rented housing that is not up to standard. This evidence has led us to believe that the most effective way to improve this situation is by implementing a new selective licensing scheme for private rented properties.
- 1.5 The new scheme will cover new wards of Finsbury Park, Tollington and Hillrise and replace the existing selective licensing scheme for Finsbury Park ward. It is the most practical next phase in our plan to improve property standards across the borough.
- 1.6 Alongside existing initiatives and our partners, this scheme will enable our officers to apply conditions and, where necessary, to secure improvements and more readily target those who do not maintain and manage their properties properly.
- 1.7 We invite all interested parties, including tenants, landlords, agents, businesses, voluntary organisations, and other residents to let us know what they think of our proposals, and I am certain that you will agree that this is the correct course of action to make Islington a safer, healthier, and altogether even better place to live than it already is.

¹ [LB Islington Private Sector Analysis 2021](#)

2 Introduction

- 2.1 Under the Housing Act 2004, there are three types of licensing scheme relating to private sector housing available to local authorities:

Mandatory licensing of certain houses in multiple occupation (HMOs)

- 2.2 All local authorities are required to operate a mandatory licensing scheme for houses in multiple occupation (HMOs) that are occupied by five or more people who are not living together as a single household and who share kitchen and/or bathroom facilities.

Additional licensing of HMOs

- 2.3 Local authorities can introduce a discretionary additional licensing scheme² for other types of HMOs not subject to mandatory licensing, in part or the whole of the area of its district. Islington introduced a borough wide additional licensing scheme³, which came into force on 1 February 2021, following the expiry of an earlier scheme covering all HMOs located on Caledonian Road and Holloway Road. This latest scheme applies to houses and flats that are let to three or more people who are not all members of the same family where three and certain converted flats covered by Section 257 of the Housing Act 2004.

Selective Licensing

- 2.4 A discretionary selective licensing scheme⁴ covers all other privately rented properties and can be introduced in part, or across the whole of a borough. The law requires that, where a proposed selective licensing designation is either greater than 20% of the geographical area of the borough, or covers more than 20% of the private rented properties within the borough, then following consultation, the scheme must be submitted to the Secretary of State for Levelling Up, Housing and Communities for approval⁵. Islington already has a selective licensing scheme in the existing Finsbury Park ward⁶, which came into operation on 1 February 2021.
- 2.5 In an area subject to licensing, all private landlords of properties that meet the scheme criteria, must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action. Schemes run for a maximum period of five years and a fee is payable for each licence.

² Housing Act 2004, [Section 56](#)

³ <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/communityandliving/information/adviceandinformation/20202021/20201207publicnoticeboroughwideadditional.pdf>

⁴ Housing Act 2004, [Section 80](#)

⁵ [The Housing Act 2004: Licensing Of Houses In Multiple Occupation And Selective Licensing Of Other Residential Accommodation \(England\) General Approval 2015](#) Paragraph 6.

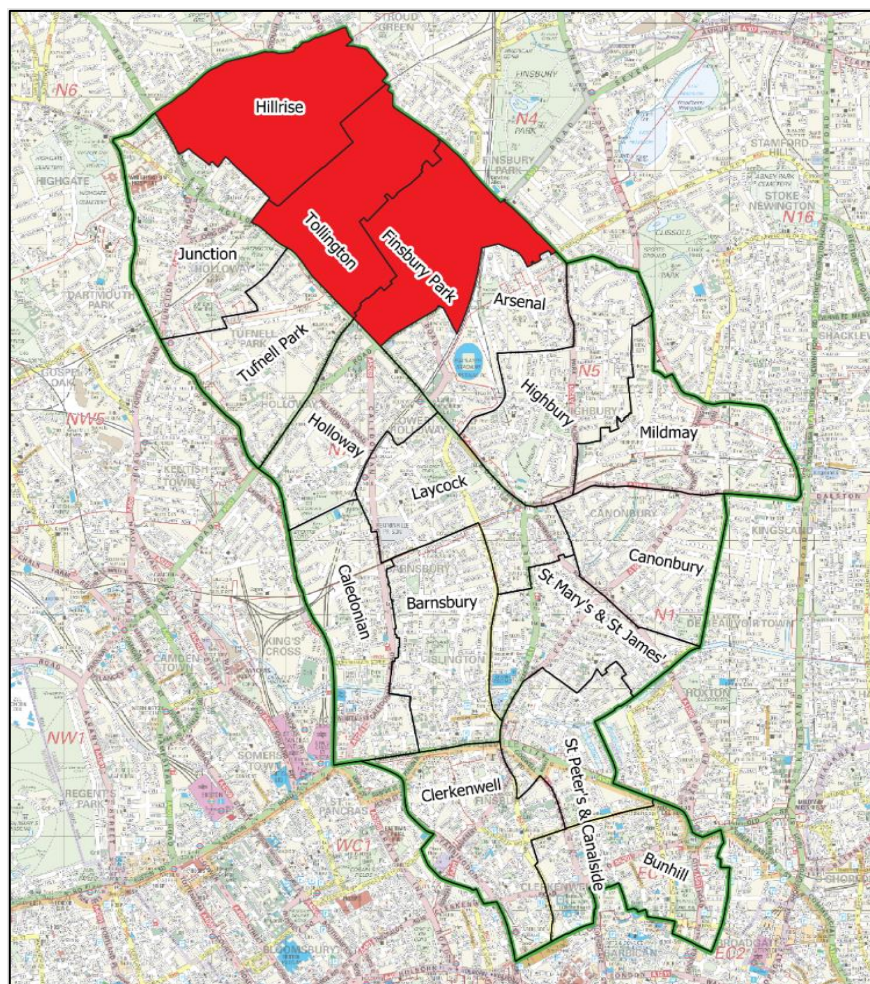
⁶ <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/communityandliving/information/adviceandinformation/20202021/20201207selectivelicensingdesignation20201.pdf>

3 Islington's selective licensing proposal

- 3.1 Islington Council is consulting on a proposal to designate a selective licensing scheme covering the new wards of Hillrise, Tollington and Finsbury Park and the revoke the existing Finsbury Park selective licensing scheme.

[Appendix 1](#) contains a list of all streets covered by the designation.

- 3.2 Map 1 shows the areas proposed to be included in the designation shaded in red.



Map 1. Areas covered by the proposed designations.

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- 3.3 The Local Government Boundary Commission for England is introducing new ward boundaries and ward names in Islington, which will take effect from May 2022. These changes impact the existing designation for selective licensing of Finsbury Park ward. The new Finsbury Park ward will include areas that are currently not part of the ward, and areas of the current ward will become part of the new Tollington ward. The existing designation definition of the area to which the scheme applies, as currently worded, will therefore become outdated, inaccurate, and confusing in its current format.
- 3.4 Islington Council proposes to designate a new selective licensing scheme covering the new Finsbury Park, Tollington and Hillrise wards and revoke the existing designation for Finsbury Park ward.

- 3.5 The effect of the new designation will be that all properties currently covered by the Finsbury Park designation will continue to be included in the new selective licensing scheme. Existing licences will remain in force under the new scheme, so there will be no change for landlords or tenants of existing licensable properties. The proposed scheme will cover less than 20% private rented properties in the borough which means that the council can make this decision without Secretary of State approval.
- 3.6 The selective licensing scheme will apply to all houses and flats located within the three new wards set out in paragraphs that are rented to either:
- a single person
 - two people sharing
 - any number of persons forming a single household.
- 3.7 Houses in Multiple Occupation that require a mandatory or additional HMO licence are exempt from selective licensing.

Licence Applications

- 3.8 The licensing process will require the applicant to:
- apply for a licence which will require providing details of the management and safety arrangements;
 - pay an application fee;
 - meet a 'fit and proper person' test to confirm the suitability of the applicant to hold a licence;
 - comply with specific licence conditions contained in Appendix 3;
 - provide copies of safety certificate such as gas safety, electrical safety, fire alarms and emergency lighting, management arrangements, tenancy agreement and floor plans.
- 3.9 On receipt of a complete application the council will carry out a series of checks before issuing a draft licence. The applicant will have the opportunity to comment on the draft licence before a full licence is issued. Properties will be risk assessed and prioritised for inspection during the 5-year life of the licence. The highest risk properties will receive an inspection first and the aim will be to inspect all licenced properties during the lifetime of the licence.
- 3.10 The licence inspection will verify the information provided on the application form, compliance with licence conditions and an assessment of the housing health and safety hazards under [Part 1 of the Housing Act 2004](#). Where defects are observed action will be taken to rectify the situation.

Licensing Objectives

- 3.11 Licensing allows the council to implement a proactive approach to identifying private rented properties and undertaking a risk- based approach to tackling poor housing conditions and raising standards in private rented housing.
- 3.12 By placing the onus on property owners to inform the council that they have a property that is in scope of the scheme to submit a licence application, the council is able to target

resources on identifying landlords that evade licensing, and those that need to take action to bring their properties up to standard.

3.13 The key licensing objective for this proposed licensing scheme is to improve property conditions in privately rented properties within the designated wards by:

- creating a clear set of rules that all landlords must follow
- providing standards for poor performing landlords to help them improve
- deterring unsuitable landlords, for example, those with certain criminal records or previous poor history as a landlord, from entering or remaining in the private rented property market
- encouraging absent or inexperienced landlords to use reputable agents to manage property on their behalf
- improving waste management and recycling
- enabling the council and tenants to more readily identify landlords
- assuring tenants that licensed accommodation is managed to a reasonable standard
- making it easier for tenants to complain about poor housing standards without fear of eviction
- creating a level playing field for landlords who treat their tenants fairly
- recognising responsible landlords who are members of a landlord accreditation scheme by offering a reduced application fee
- prioritising the council's enforcement resources towards identifying and tackling landlords who need to improve the way they manage their properties.

4 Considerations for introducing selective licensing schemes

- 4.1 Islington has an important and growing private rented sector (PRS) that provides affordable housing options for local people. It recognises that most landlords operate professionally, however, the council is concerned about the level of privately rented properties that fail to meet satisfactory levels of property management and the resultant low quality of housing in certain areas of the borough.
- 4.2 Improving the quality of housing in the private rented sector is key to the council's housing strategy. The council considers that introducing new selective licensing scheme for additional wards is the best tool available to tackle problems of poor property conditions due to substandard management practices in the private rented sector. Licensing is part of a wider strategic approach to drive up living standards for all, improve the environment and make Islington the place of choice to live in London.
- 4.3 The proposed selective licensing scheme primarily seeks to address high levels of poor property conditions in the borough. The potential for licensing to combat anti-social behaviour, crime and deprivation further supports the proposal.
- 4.4 Following an extensive analysis of property conditions and other considerations in the private rented sector, the data clearly shows nine wards which would benefit most from selective licensing. Those wards are Finsbury Park, Junction, Tollington, Caledonian, Hillrise, Laycock, Tufnell Park, Arsenal and Holloway.
- 4.5 The council intends to take a phased approach to selective licensing, starting with a scheme covering less than 20% of the borough, thus not requiring approval from the secretary of state, before proposing further schemes.
- 4.6 A selective licensing scheme is already in operation in Finsbury Park and in some of Tollington ward. The new scheme will cover Finsbury Park, Tollington and Hillrise. These wards were chosen to make the scheme as clear and practical as possible, covering a simply defined geographical area (the North East of the borough), including all areas with an existing selective licensing scheme, whilst remaining below the 20% threshold.

Housing Strategy

- 4.7 The [Housing Strategy 2021-2026](#) outlines the council's approach to housing, including the provision of affordable homes, homelessness, new build, net carbon zero and the private rented sector for the next 5 years. The strategy states the council's commitment to standing up for private renters by using its licensing powers to set and maintain housing conditions in this sector. Islington wants to ensure that all privately rented properties in the borough offer residents a choice of safe, quality and well managed accommodation.
- 4.8 The strategy recognises the high number of complaints coming from the private rented sector in Islington. It outlines the measures the council are taking to tackle rogue landlords: providing advice, serving improvement notices, and promoting high standards of professionalism amongst landlords and managing agents through forums, campaigns and accreditation schemes.
- 4.9 The strategy sets out an intention to build on the successes of existing licensing schemes, extending selective licensing to other areas where evidence dictates it is the most

appropriate form of action. Islington's schemes will contribute to a clearer regulatory framework across London, directly supporting the Mayor of London's Housing Strategy.

- 4.10 In addition to the Housing Strategy, Islington has considered how the selective licensing proposals complement other council strategy including the council's overarching strategic plan.
- 4.11 We recognise that to achieve these priorities and ambitions there is a need for a robust and coherent regulatory framework in which this market operates.
- 4.12 Islington has identified that problems in the private rented sector of poor property and tenancy management and associated crime and anti-social behaviour are distributed across the borough and are not exclusive to a particular type of rented property. To tackle these issues, we are proposing that alongside the existing borough wide additional licensing scheme for Houses in Multiple Occupation, we replace the selective licensing scheme in Finsbury Park ward with a selective licensing scheme across three of the seventeen new wards. We have gathered data that provides clear evidence of significant issues, primarily in relation to poor property conditions, but supported by evidence of deprivation, ASB and crime. The introduction of these schemes will assist the council in tackling these issues and significantly contribute to the improvement of the private rented sector.

Selective Licensing Criteria

- 4.13 The Selective Licensing of Houses (Additional Conditions) (England) Order 2015 sets out the requirements for designating a selective licensing scheme.
- 4.14 The first requirement is that the area must have a high proportion of private rented properties⁷. Government guidance⁸ suggests any area with more than the national average would indicate a high proportion, which according to the English House Survey for 2019-20 was 19%⁹. The data for Islington shows that 30% households in the borough are in the private rented sector and that the percentage of privately rented properties in each of the new wards ranges from 22.5% to 41.2%. Therefore, subject to meeting the other relevant criteria, every ward would be eligible for inclusion in a selective licensing scheme.

The full data set is contained in [Section 8](#).

- 4.15 The next requirement is that the area covered by the proposals must be seen to be suffering from problems and that these problems are attributable to at least one of the following criteria:
- poor property conditions¹⁰
 - a significant and persistent problem caused by anti-social behaviour¹¹
 - high levels of crime¹²

⁷ The Selective Licensing of Houses (Additional Conditions) (England) Order 2015. <https://www.legislation.gov.uk/ukdsi/2015/9780111131435>

⁸ Selective licensing in the private rented sector. A Guide for local authorities. Department for Communities and Local Government. <https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities>

⁹ English Housing Survey Headline Report, 2019-20

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

¹⁰ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – [Article 4](#)

¹¹ Housing Act 2004. Section 80 (6) (a)

¹² The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – [Article 7](#)

- high level of deprivation¹³
- high levels of migration¹⁴
- low housing demand (or is likely to become such an area)¹⁵.

4.16 In considering the relevant criteria, data has been analysed at borough level, ward level and at the level of smaller areas known as Lower Super Output Areas (LSOAs), depending upon the detail of data available for each of the criteria.

4.17 We believe that the level of poor property conditions meets the requirement to designate a selective licensing scheme in the proposed wards. Levels of anti-social behaviour, crime and deprivation further support a decision to introduce selective licensing. Migration and low housing demand do not contribute to the decision to introduce the new scheme.

Poor Property Conditions

4.18 The council analysed the data that it collects on poor property conditions in the PRS and concluded that the new wards of Finsbury Park, Tollington, Hillrise, Junction, Tufnell Park, Holloway, Arsenal, Laycock and Caledonian, have the lowest standards. Properties are frequently found to be suffering from issues such as:

- disrepair
- damp and mould
- poor, inadequate, or missing facilities
- poor layout
- risk of falls
- inadequate prevention of entry by intruders
- overcrowding
- gas safety.

4.19 The council received 3,168 complaints about properties in the PRS (excluding specific HMO related complaints) between September 2014 and March 2020 ranging from disrepair to nuisance such as accumulations of refuse and pest infestations. The highest numbers of complaints were in the new wards of Finsbury Park, Caledonian, Junction, Tollington, Laycock, Arsenal, Hillrise, Holloway and Tufnell Park.

4.20 Although tenant's complaints are a strong indicator of poor conditions the main indicator is the presence of what are known as category 1 and category 2 hazards¹⁶. There are 29 hazards which can present a risk to the health and safety of tenants which, when risk assessed, determines the extent to which the council should take action to remove or reduce the hazard.

4.21 Data indicates that the number of properties with category 1 and the highest risk category 2 hazards (bands D & E) and the number of such hazards identified in each property inspected by council officers were greater in the nine wards identified above.

¹³ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – [Article 6](#)

¹⁴ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – [Article 5](#)

¹⁵ Housing Act 2004. [Section 80](#) (3) (a)

¹⁶ Housing Act 2004. Section 2

- 4.22 A further indicator of poor housing conditions is that the hazards identified during complaint investigations were so serious that they warranted the service of a formal enforcement notice requiring works to be undertaken within a specified time. The greatest number of properties requiring enforcement action for hazards identified were in the nine wards listed above.
- 4.23 The age of a property can be a contributory factor as older properties tend to require a higher level of maintenance to the external fabric of the building, are not so well insulated which means there is a higher risk of damp, condensation, and excess cold. The Department for Levelling Up, Housing and Communities explicitly considers the age of building components, alongside component condition, to determine whether a dwelling is in a reasonable state of repair and therefore 'decent home'.¹⁷ The majority of components are considered old after 40 years and all components are considered old after 80 years.
- 4.24 Unfortunately, data on the age of properties is only available for existing ward boundaries but correlating this data again the new ward boundaries indicate that new wards of Laycock, Tollington, Tufnell Park, Finsbury Park, Hillrise, Arsenal, Junction, Caledonian and Holloway have a sizeable number of properties built before 1945.
- 4.25 A report by Shelter in 2014, titled "Can't complain: why poor conditions prevail in private rented homes"¹⁸ suggested that up to 61% of private renters have experienced at least one of the following in the last 12 months: mould or damp, leaking roofs or windows, electrical hazards, animal infestations or gas leaks¹⁹. The report suggests one in eight tenants experiencing problems do not report poor conditions because they fear retaliatory eviction. The council's own estimates suggest there could be at least **18.7%** of privately rented properties in Islington with category 1 or 2 hazards based upon the analysis of complaint and enforcement data for the PRS discussed in [Section 8](#).
- 4.26 The introduction of selective licensing covering three wards will enable the council to systematically carry out inspections to identify hazards and compliance with licence conditions and to secure improvements.
- 4.27 Where action is required to remedy category 1 and 2 hazards the council will use the most appropriate enforcement powers to seek remediation, including the service of Improvement Notices, Prohibition Orders, Prosecutions and Civil Penalties.
- 4.28 The council expects that selective licensing will encourage most landlords to proactively work towards providing and maintaining their properties to the required standard and the provision of a set of clear licence conditions makes will facilitate this objective.
- 4.29 In the proposed scheme licence conditions will cover:
- dealing with defects and disrepair
 - gas safety
 - electrical safety
 - pest control management
 - carbon monoxide detectors

¹⁷<https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance>

¹⁸ https://landlordlawblog.co.uk/wp-content/uploads/2014/03/6430_04_9_Million_Renters_Policy_Report_Proof_6_opt.pdf

¹⁹ YouGov 2014, base 4544 private renting English adults. Jointly commissioned by Shelter and British Gas

- smoke alarms
- regular checks on the internal and external parts of the building.

4.30 We believe that the level of poor property conditions meets the requirement to designate a selective licensing scheme in the proposed wards.

Anti-social behaviour (ASB)

4.31 Anti-social behaviour can have an adverse impact upon on the health, safety and wellbeing of tenants, neighbours and local neighbourhoods. ASB can take many forms, but in the context of selective licensing the council has focused on analysing data relating to²⁰:

- intimidation and harassment of tenants or neighbours
- noise, rowdy and nuisance behaviour affecting persons living in or visiting the vicinity
- animal related problems
- vehicle related nuisance
- anti-social drinking or prostitution
- illegal drug taking or dealing
- graffiti and fly posting
- litter and waste within the curtilage of the property.

4.32 A total of 62,400 cases of ASB were reported to the council or the police during 2019 and 2020 relating to a wide range of sources. Whilst not all ASB can be directly linked to private rented properties, at least 5% of ASB cases during this two-year period were linked to PRS properties.

4.33 Data indicates that seven wards meet several trigger indicators to justify ASB being a supporting factor in the proposal to include these seven wards in the selective licensing designation. These seven wards were Tollington, Finsbury Park, Tufnell Park Caledonian, Hillrise, Junction and Arsenal.

4.34 Although ASB is not the primary reason for selective licensing, licence conditions can set management standards to assist landlords play their part in helping to mitigate against ASB associated with the PRS, for example:

- obtaining reference checks for proposed tenants checks
- tenancy conditions and management arrangement relating to antisocial behaviour by tenants and their visitors
- waste management and recycling facilities
- undertaking regular property inspections.

Crime

4.35 A high level of crime is not exclusive to any one part of the borough but some of the wards selected for inclusion in selective licensing are above average for specific types of crime. For this reason, crime is a supporting factor for two of the three wards that that are being considered for selective licensing. Finsbury Park, in which crime in general is high and Tollington that has relatively high levels of residential burglary.

²⁰ [Selective licensing in the private rented sector. A Guide for local authorities.](#) Department for Communities and Local Government

- 4.36 Although crime is not the primary reason for selective licensing, licence conditions can set management standards to assist landlords play their part in helping to protect properties from entry by intruders including maintaining entrance doors, locks and door entry systems, door, and window key management arrangements.

Deprivation

- 4.37 To show that deprivation is a relevant criterion for the area proposed for a selective licensing designation, it must be demonstrated that the area is suffering from an elevated level of deprivation, which affects a considerable number of the occupants of private rented properties²¹.
- 4.38 Deprivation indices consider the following factors when comparing against other neighbourhoods:
- the employment status of adults,
 - the average income of households,
 - the health of households,
 - the availability and ease of access to education, training and other services for households,
 - housing conditions,
 - the physical environment,
 - levels of crime.
- 4.39 The most deprived households tend to live in the poorest accommodation. A recently published study, *The Evolving Private Rented Sector: Its Contribution and Potential*, by Julie Rugg and David Rhodes (*The 2018 Rugg Report*)²² states, “As the proportion of households living in the PRS increased, so the level of deprivation also tended to increase within each region, the most deprived areas had the largest PRS.”
- 4.40 Although the 2019 Index of Multiple Deprivation shows that Islington has improved from being the 11th most deprived borough in the country in 2011 to the 53rd most deprived²³, Islington remains a deprived borough and is the 6th most deprived in London. The rank of deprivation has shown Finsbury Park, Hillrise, Tufnell Park, Laycock, Arsenal and Holloway to be amongst the new wards with the highest levels of deprivation either across the board or in specific domains, such as access to housing, income, and environment.
- 4.41 Although deprivation is not the principal reason for designation, the high levels of deprivation in Finsbury Park and Hillrise is a strong supporting factor.
- 4.42 Licences under the designation will help to ensure that properties are responsibly managed and thereby contribute to an improvement in the well-being of the occupants and the wider community in those wards and surrounding areas and so contribute to a reduction in deprivation.

²¹ Selective licensing in the private rented sector A Guide for local authorities. Department for Communities and Local Government

²² <http://www.nationwidefoundation.org.uk/wp-content/uploads/2018/09/Private-Rented-Sector-report.pdf>

²³ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Migration

- 4.43 The 2018 Rugg & Rhodes Report stated that “Eighty per cent of recent migrants to the UK from overseas live in the PRS, and this proportion is higher in London; lower-income migrants are often disadvantaged in the PRS as a consequence of housing rights and responsibilities and language difficulties; there are concerns that ‘right to rent’ regulation is further disadvantaging migrant renters who may be more likely to fall into the more informal and shadowy PRS”
- 4.44 The Office for National Statistics mid-year population estimates²⁴ show that between 2018 and 2019 14 out of 16 wards in Islington experienced an increase in population. The Department for Levelling Up, Housing & Communities (formerly MHCLG) guidance suggests that an increase of greater than 15% in a 12-month period is an indicator of high levels of migration²⁵. The highest increase was in Holloway Ward, which was 3.9%.
- 4.45 The analysis of data migration in section 8 indicates that migration is not a supporting factor in the proposal to designate 3 wards for selective licensing.

Low housing demand

- 4.46 Islington is not an area of low housing demand and so this not a relevant factor in the proposal to designate 3 wards for selective licensing

Conclusion

- 4.47 Following consideration of the above criteria the council are of the firm belief that the introduction of a selective licensing scheme in three wards in the proposed designation will be the most effective way to deal with improving housing conditions in the private rented sector.
- 4.48 Additional and selective licensing schemes are an integral part of the councils Housing Strategy and Islington Together Strategic Plan. Working alongside mainstream services and council initiatives selective licensing will enable the council to regulate the privately rented sector in Islington and systematically identify and tackle poor housing conditions.
- 4.49 The three wards selected for inclusion in the proposed selective licensing scheme meet the property licensing criteria and the council will proceed to the consultation stage on this basis.
- 4.50 All other criteria have been considered but the data indicates that ASB, crime and deprivation are material considerations in some of the wards selected but they are not the primary reason for proposing selective licensing to introduce a new selective licensing scheme.
- 4.51 Table 1 shows the wards that have been shown to have high, or above mean average issues against the criteria of property conditions, ASB, crime and deprivation. The three

²⁴<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>

²⁵ Selective licensing in the private rented sector A Guide for local authorities. Department for Communities and Local Government

wards in the proposed designation all feature against property conditions and at least two other criteria.

Table 1. Wards matched against criteria for selective licensing.

| New ward | Property conditions | ASB | Crime | Deprivation |
|------------------------|---------------------|-----|-------|-------------|
| Finsbury Park | x | x | x | x |
| Caledonian | x | x | x | |
| Hillrise | x | x | | x |
| Laycock | x | | x | x |
| Tufnell Park | x | x | x | x |
| Arsenal | x | x | x | x |
| Junction | x | x | x | |
| Holloway | x | | x | x |
| Tollington | x | x | x | |
| Bunhill | | x | x | x |
| Canonbury | | x | x | x |
| Clerkenwell | | x | x | |
| St Mary's & St James' | | | x | |
| Highbury | | x | x | |
| Mildmay | | x | x | |
| St Peter's & Canalside | | x | | |
| Barnsbury | | | | |

5 Alternative options considered

- 5.1 The council's preferred approach is to improve housing conditions in the private rented sector by using licensing powers to set standards, for landlords to be required to apply for a licence and for robust enforcement action to be taken against landlords that fail to licence or provide accommodation that meets the required standard.
- 5.2 Alternative options for identifying and dealing with properties in the PRS that are not safe or managed effectively have been considered.

Make no changes to the current approach

- 5.3 In 2019 the Finsbury Park selective licensing scheme consultation indicated that over 64% of respondents were supportive of proactively licensing privately rented properties and to improve the housing standards in the private rented sector and to hold rogue landlords to account.
- 5.4 The council could continue to operate the selective licensing scheme in the current ward of Finsbury Park and for all other parts of the borough tackle poor conditions in the private sector when tenants contact the council to complain about their accommodation. This approach relies on tenants being aware and confident that they can seek the council's help without any concern that such an approach could damage their relationship with their landlord.
- 5.5 It is neither effective for tenants nor efficient for the council to rely on complaints to improve housing conditions in the private rented sector. Many properties go under the radar because tenants are afraid or reluctant to complain and any proactive inspection programme needs to be intelligence led to identify and target the worst properties.
- 5.6 A licensing regime requires properties to meet a minimum standard, for landlords to apply for a licence and the council to target the highest risk properties for inspection first. Licensing properties in the selected area creates a level playing field where tenants can be assured that landlords will maintain properties to certain standards, that the council will regulate through the imposition of conditions and taking enforcement action when required.
- 5.7 Once the new ward boundaries are introduced in May 2022, the existing designation for Finsbury Park will become contradictory and confusing. The designation as it stands refers to both a boundary marked on a map, which clearly shows the streets in scope, and the designation also states it applies to Finsbury Park ward, which will not have the same boundaries after May 2022. Revocation of the existing scheme and a new designation based on the new boundaries, incorporating the whole of the new Finsbury Park ward in addition to the proposed inclusion of Tollington and Hillrise will eliminate this contradiction and any confusion arising.

Introduce different area-based schemes to the ones proposed

- 5.8 The law requires that certain criteria are met for a selective licensing designation to be made. The council is required to consider the law and guidance issued by government and ensure that its proposals are consistent with them. Once the 20% threshold for either the geographical area of the borough or the total number of properties covered by a selective

scheme is reached, any decision to extend selective licensing beyond this will require approval from the Secretary of State.

- 5.9 Whilst the council's strategy for the private rented sector is to set and maintain housing standards through licensing it recognises that there should be a phased approach, based on evidence, with the worst areas selected for licensing first. The data indicates that the new wards of Finsbury Park, Tollington and Hillrise are three of the wards where property licensing could have the greatest effect.
- 5.10 A selective licensing scheme is already in place in Finsbury Park and part of Tollington ward. For the new scheme, Finsbury Park, Tollington and Hillrise wards were chosen to make the scheme as clear and practical as possible, covering a simply defined geographical area (the North East of the borough), including all areas with an existing selective licensing scheme, whilst remaining below the 20% threshold.

Encourage more voluntary landlord accreditation

- 5.11 Islington promotes the London Landlord Accreditation Scheme (LLAS) and Accreditation and Training for Landlords and Agents Scheme (ATLAS)²⁶.
- 5.12 This is a voluntary scheme where landlords sign up to a national code of conduct and are supported with training and on-going professional development opportunities comply with the law and provide safe, decent quality homes.
- 5.13 There are approximately 1000 accredited landlords in Islington signed up to ATLAS. Experience has shown that whilst good landlords are willing to participate in accreditation, a significant proportion of landlords are not prepared to engage with voluntary accreditation schemes. For this part of the sector, effective licensing and enforcement is the appropriate course of action.
- 5.14 The council will continue to promote landlord accreditation alongside the introduction of any discretionary licensing schemes.

Alternative options conclusions

- 5.15 The options outlined above do not offer an effective alternative to improving property conditions in the selected wards.
- 5.16 Selective licensing enables the council to set standards to improve and maintain private sector housing conditions. Licensing requires the landlord and managing agent to meet "fit and proper person" criteria to obtain a licence and this in turns deters rogue landlords from operating in private rented sector. There is no practical alternative to a selective licensing scheme.

²⁶ <https://www.londonlandlords.org.uk/>

6 Proposed licence fee structure

- 6.1 The 5-year licence fee will be £800 per licensable property. For licence applicants who are members of an accredited landlord scheme the fee is £725. Full details of all the fees can be found in [Appendix 2](#).
- 6.2 The fee has been set on a cost recovery basis and, to comply with legal requirements, will be in 2 parts; part 1 will cover the cost of administering the licensing scheme and part 2 will cover the costs of monitoring and enforcement.
- 6.3 The part 1 fee will be payable when the application is submitted. Part 2 will become payable when the application has been validated and the draft licence is ready to be issued. If the council refuses an application the applicant is only liable to pay the part 1 fee.
- 6.4 The income raised from the scheme is ring-fenced, which means that it can only be used to cover costs associated with selective licensing over the five years of the scheme. It cannot be used to raise income for other council functions.

7 Conditions

- 7.1 Each new licence granted would be subject to a set of licence conditions, including mandatory conditions for selective licences set out in [Schedule 4](#) of the Housing Act 2004.
- 7.2 The Licence conditions can be found in Appendix 3.

8 The evidence

- 8.1 The council has undertaken an extensive review of all available data, both from within its own organisation and that more widely available, in relation to both the local, regional and national picture in reaching its conclusion that the proposed selective licensing scheme are the most appropriate correct course of action to take. Key data sources include:
- 2011 Census data
 - Office for National Statistics (ONS)
 - Greater London Authority (GLA Datastore)
 - Islington Council data.
- 8.2 This section begins with an analysis of Islington as a borough, followed by an analysis of each of the criteria to be considered for a selective licensing scheme, broken down by ward.

8.1 PART A: The London Borough of Islington – Geography

- A1. Islington is a north-central, inner London borough. The southern part of the borough borders the City of London and the London boroughs of Camden to the west, Hackney to the east and Haringey to the north.
- A2. Islington is a borough of great strengths: thriving businesses; excellent transport links; outstanding services; and most importantly, a rich and wonderful diversity of people, cultures and communities. But despite these strengths, many people are in danger of being left behind. Poverty, mental ill-health and anxiety about the future, lack of access to good jobs, poor air quality and housing conditions, prejudice, racism and injustice are holding people back.
- A3. Islington is small, and densely populated, with a growing, diverse, and young population, which was estimated to be 244,372²⁷ in 2021. It is a borough of stark contrasts, where many children and older people are living in poverty. Islington has the highest level of child poverty in London (28%) and ranks 4th highest in London for poverty among older people.
- A4. Islington is the third smallest London local authority after City of London and Kensington & Chelsea, at 14.8 square kilometres, or 6 square miles²⁸, accounting for only 0.9% of the London geographical area. Only 13% of the borough's land is green space: this is the second lowest proportion of any local authority in the country.
- A5. Table 2 below shows the area of London boroughs and the population density.

²⁷ <https://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough>

²⁸ <https://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough>

Table 2. Islington area and population compared to London.

| Borough | Square kilometres | % London geographical area | Population |
|-------------------------------|--------------------------|-----------------------------------|-------------------|
| Tower Hamlets | 19.8 | 1.3% | 331620 |
| Islington | 14.8 | 0.9% | 244372 |
| Hackney | 19.0 | 1.2% | 292023 |
| Kensington and Chelsea | 12.1 | 0.8% | 161552 |
| Lambeth | 26.8 | 1.7% | 342250 |
| Westminster | 21.5 | 1.4% | 262317 |
| Hammersmith and Fulham | 16.4 | 1.0% | 195981 |
| Camden | 21.8 | 1.4% | 259344 |
| Southwark | 28.9 | 1.8% | 332679 |
| Newham | 36.2 | 2.3% | 366943 |
| Wandsworth | 34.3 | 2.2% | 337783 |
| Haringey | 29.6 | 1.9% | 291330 |
| Lewisham | 35.1 | 2.2% | 320574 |
| Brent | 43.2 | 2.7% | 346437 |
| Waltham Forest | 38.8 | 2.5% | 292788 |
| Ealing | 55.5 | 3.5% | 369685 |
| Greenwich | 47.3 | 3.0% | 294837 |
| Barking and Dagenham | 36.1 | 2.3% | 221495 |
| Merton | 37.6 | 2.4% | 214740 |
| Redbridge | 56.4 | 3.6% | 316288 |
| Harrow | 50.5 | 3.2% | 263484 |
| Hounslow | 56.0 | 3.6% | 286947 |
| Kingston upon Thames | 37.3 | 2.4% | 184660 |
| Sutton | 43.8 | 2.8% | 213340 |
| Barnet | 86.7 | 5.5% | 411275 |
| Croydon | 86.5 | 5.5% | 403461 |
| Enfield | 80.8 | 5.1% | 346635 |
| Bexley | 60.6 | 3.9% | 256845 |
| Richmond upon Thames | 57.4 | 3.7% | 203312 |
| City of London | 2.9 | 0.2% | 8164 |
| Hillingdon | 115.7 | 7.4% | 319467 |
| Havering | 112.3 | 7.1% | 265930 |
| Bromley | 150.1 | 9.5% | 339466 |
| TOTAL | 1,571.9 | 100% | 9,298,024 |

A6. Map 2 shows the location of Islington in north-central London.

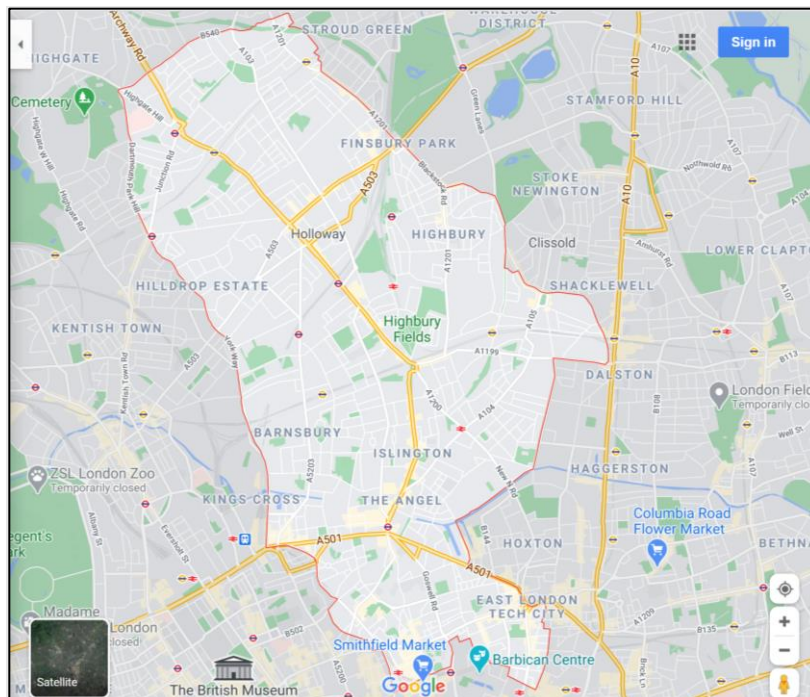


Map 2. London borough map.

- A7. Highbury Fields is the largest green space, part of only 13%²⁹ green space within the borough, which is the second lowest proportion of any local authority in the country and far lower than outer London boroughs such as Barking and Dagenham where approximately a third of the borough is green space.

Map 3 shows the borough boundary and green spaces.

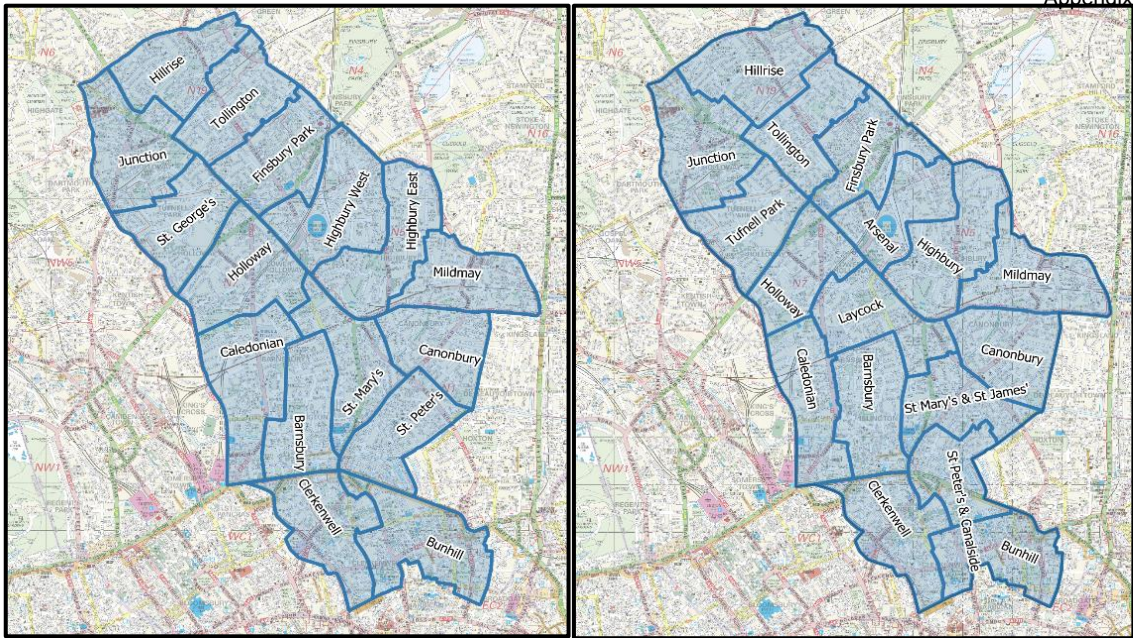
²⁹ Islington Strategic Plan 2021 <https://democracy.islington.gov.uk/documents/s25785/Appendix%20A%20-%20Strategic%20Plan.pdf?>



Map 3. Google maps search page showing Islington boundary.

- A8. Islington currently has 16 wards. The largest existing wards by area are Caledonian, Bunhill and Highbury West. However, the Local Government Boundary Commission has introduced changes that will take effect from the council elections in May 2022.³⁰ The changes bring about an increase in the number of wards to 17. The boundaries of all wards will change, with some significant changes resulting in several current wards splitting across two or more new wards. Map 4 shows the ward boundaries before and after the changes. Highbury becomes the largest ward.

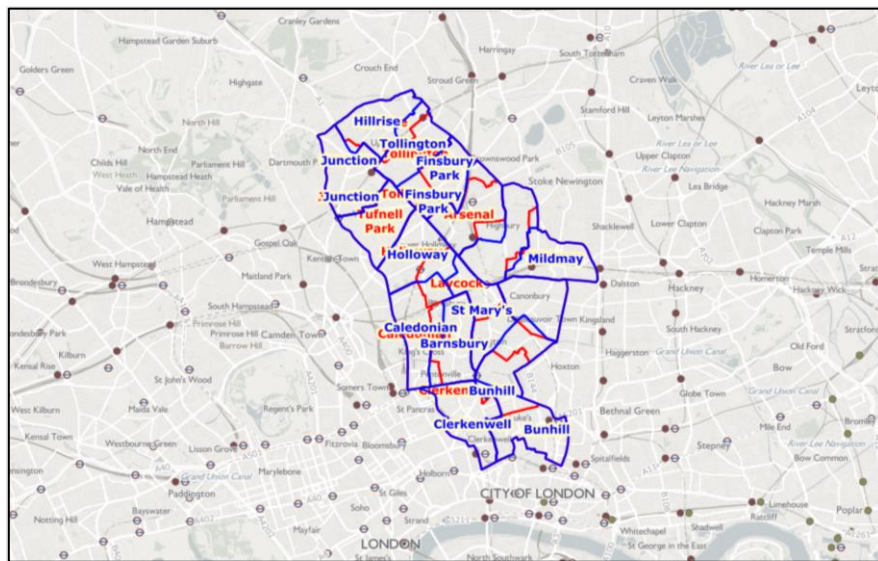
³⁰ The London Borough of Islington (Electoral Changes) Order 2020 has determined a number of Ward boundary changes which come into effect at the local elections in May 2022.



Map 4. Existing wards (left) and new wards in Islington.

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- A9. Map 5 shows the before and after boundaries overlaid on a single map, with the red being the new ward boundaries and the blue the existing boundaries.



Map 5. New wards overlaid on old wards.

Table 3. New ward names.

| New wards |
|------------------------|
| Barnsbury |
| Bunhill |
| Caledonian |
| Canonbury |
| Clerkenwell |
| Finsbury Park |
| Highbury |
| Arsenal |
| Hillrise |
| Holloway |
| Junction |
| Mildmay |
| Tufnell Park |
| St Mary's & St James' |
| St Peter's & Canalside |
| Tollington |
| Laycock |

A10. In terms of geographical area, Figure 1 shows Highbury is the largest new ward, followed by Junction and Hillrise. St. Peter's & Canalside is the smallest new ward.

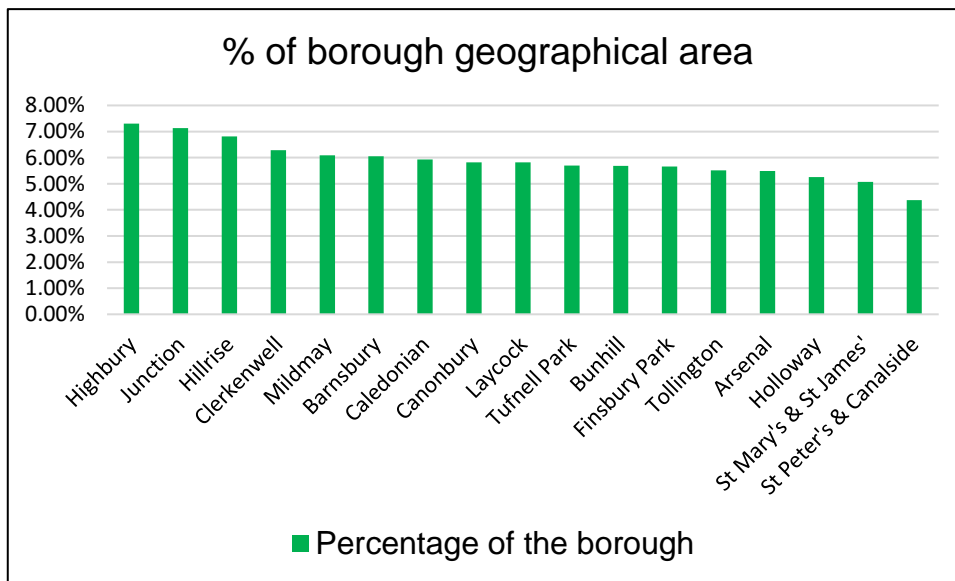


Figure 1. Percentage of geographical area of Islington by ward.

8.2 PART B: The London Borough of Islington – Population

- B1. Although the 3rd smallest London borough by area, in 2020 Islington was estimated to be the second-most densely populated local authority area in England and Wales,³¹ at 2.8 times the London average and more than 38 times the national average.

The estimated population of 242,827 in 2020, which equates to 16,097 people per square kilometre.

Figure 2 below shows the relative population density compared to other London boroughs.³²

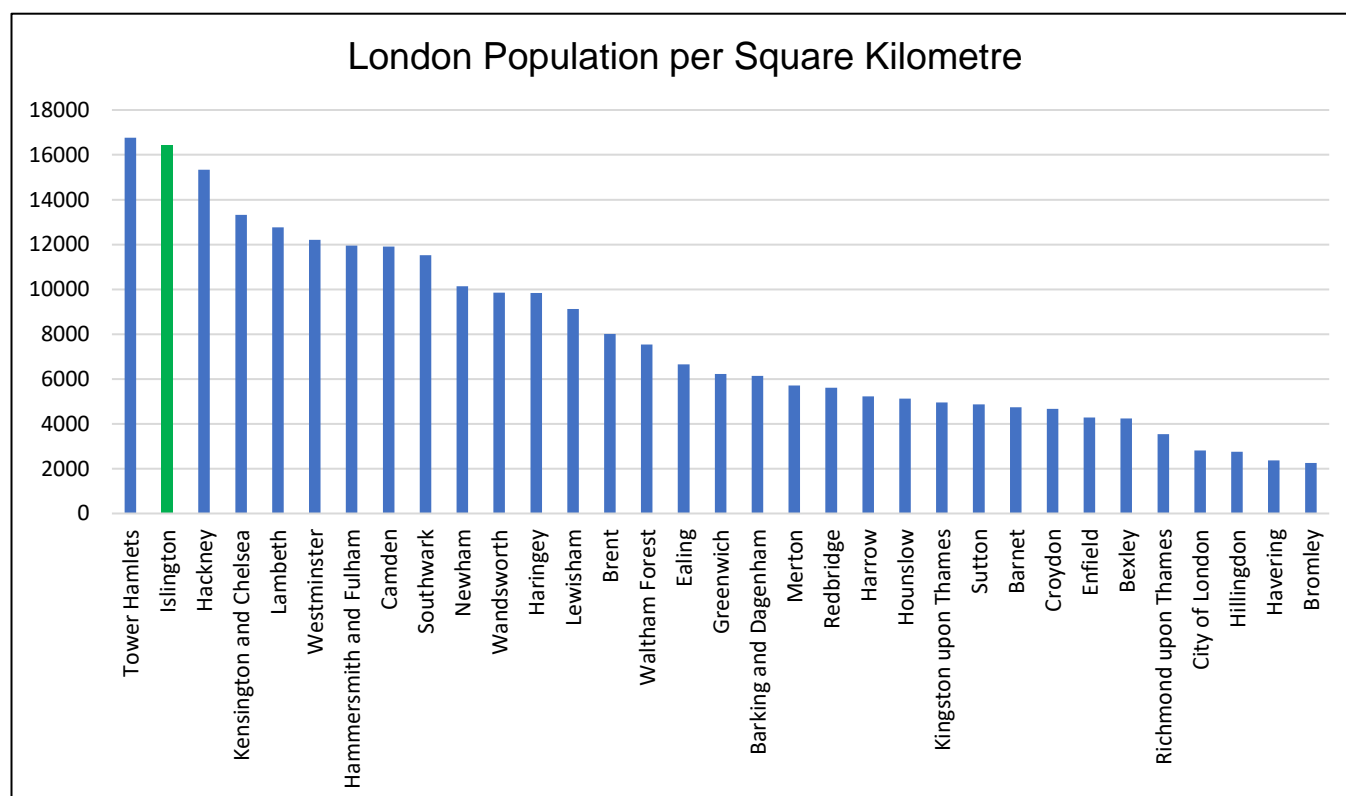


Figure 2. Population density of London boroughs.

- B2. The population of Islington has risen steadily over the last 10 years. In 2009 it was estimated to be 191,821. Table 4 below shows the area of all London boroughs and their population densities.

³¹ Land Area and Population Density, Ward and Borough. Published by: Greater London Authority <https://data.gov.uk/dataset/a76f46f9-c10b-4fe7-82f6-aa928471fcd1/land-area-and-population-density-ward-and-borough>

³² Source - GLA Population Estimates 2021. <https://data.london.gov.uk/dataset/land-area-and-population-density-ward-and-borough>

Table 4. Islington area and population density compared to London.

| Borough | Population per square kilometre | Square kilometres |
|------------------------|---------------------------------|-------------------|
| Tower Hamlets | 16764.3 | 19.8 |
| Islington | 16448.7 | 14.8 |
| Hackney | 15330.1 | 19 |
| Kensington and Chelsea | 13325 | 12.1 |
| Lambeth | 12765.7 | 26.8 |
| Westminster | 12208.2 | 21.5 |
| Hammersmith and Fulham | 11951.9 | 16.4 |
| Camden | 11902.4 | 21.8 |
| Southwark | 11526.5 | 28.9 |
| Newham | 10137 | 36.2 |
| Wandsworth | 9858.2 | 34.3 |
| Haringey | 9842.8 | 29.6 |
| Lewisham | 9120.4 | 35.1 |
| Brent | 8013.3 | 43.2 |
| Waltham Forest | 7544.5 | 38.8 |
| Ealing | 6655.7 | 55.5 |
| Greenwich | 6228.9 | 47.3 |
| Barking and Dagenham | 6134.3 | 36.1 |
| Merton | 5707.4 | 37.6 |
| Redbridge | 5606.1 | 56.4 |
| Harrow | 5221.4 | 50.5 |
| Hounslow | 5126.1 | 56 |
| Kingston upon Thames | 4955.8 | 37.3 |
| Sutton | 4865.6 | 43.8 |
| Barnet | 4741 | 86.7 |
| Croydon | 4664.1 | 86.5 |
| Enfield | 4288.3 | 80.8 |
| Bexley | 4239.7 | 60.6 |
| Richmond upon Thames | 3541.6 | 57.4 |
| City of London | 2811.4 | 2.9 |
| Hillingdon | 2761.1 | 115.7 |
| Havering | 2367 | 112.3 |
| Bromley | 2261.1 | 150.1 |
| TOTAL | | 1,571.9 |

B3. Population density is only available for existing wards. Density is even, with the most densely populated areas are St. Peters, Finsbury Park, Bunhill and Mildmay wards. Table 5

shows the GLA population and density estimates per Islington ward for 2021. Bunhill has the largest population and Clerkenwell has the smallest population.

Table 5. Population, size, and density of existing Islington wards.

| Existing ward | Population | % borough population | Square kilometres | % borough geographical area | Population per square kilometre |
|---------------|----------------|----------------------|-------------------|-----------------------------|---------------------------------|
| St. Peter's | 15725 | 6.4% | 0.81 | 5.5% | 19413.58 |
| Finsbury Park | 17124 | 7.0% | 0.916 | 6.2% | 18694.32 |
| Bunhill | 19598 | 8.0% | 1.089 | 7.3% | 17996.33 |
| Mildmay | 14703 | 6.0% | 0.826 | 5.6% | 17800.24 |
| Highbury West | 18942 | 7.8% | 1.082 | 7.3% | 17506.47 |
| Tollington | 14700 | 6.0% | 0.847 | 5.7% | 17355.37 |
| Holloway | 17189 | 7.0% | 1.009 | 6.8% | 17035.68 |
| Barnsbury | 14127 | 5.8% | 0.83 | 5.6% | 17020.48 |
| St. George's | 14240 | 5.8% | 0.846 | 5.7% | 16832.15 |
| Canonbury | 13511 | 5.5% | 0.807 | 5.4% | 16742.26 |
| Hillrise | 13475 | 5.5% | 0.825 | 5.6% | 16333.33 |
| St. Mary's | 13689 | 5.6% | 0.869 | 5.8% | 15752.59 |
| Caledonian | 16768 | 6.9% | 1.138 | 7.7% | 14734.62 |
| Clerkenwell | 13121 | 5.4% | 0.935 | 6.3% | 14033.16 |
| Highbury East | 14006 | 5.7% | 1.004 | 6.8% | 13950.20 |
| Junction | 13453 | 5.5% | 1.028 | 6.9% | 13086.58 |
| TOTAL | 244,371 | | 14.861 | | 16,038.00 |

- B4. Figure 3 shows the population density of existing wards, with St. Peter's ward being the most densely populated and Junction the least populated.

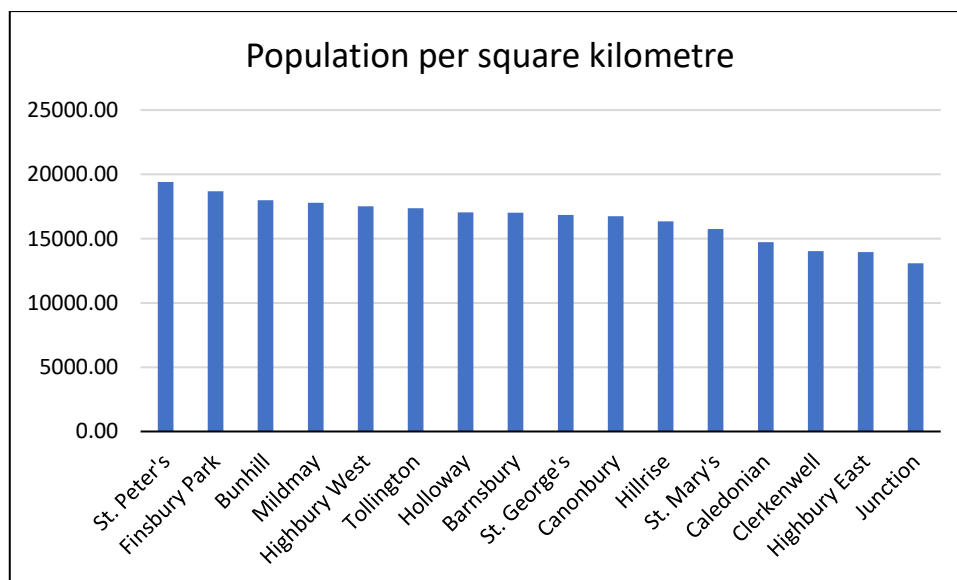


Figure 3. Population of Islington wards per square kilometre.

- B5. Islington's population profile in terms of relationship status is different compared to London and England, with 60% of residents recorded as single compared to 44% in London and

35% in England. The percentage of people recorded as single in Islington increased from 54% in 2001. The equivalent figure was 41% in London and 30% in England in 2001

- B6. The largest category for household composition in Islington is one person households at 31% (2011 Census). This had remained unchanged since 2001 (32%).
- B7. It is estimated that the population of Islington will grow by 3% (7,000 people) between 2020 and 2030.
- B8. Islington has the highest level of child poverty in London (28%) and ranks 4th highest in London for poverty among older people.
- B9. Even before the pandemic, Islington ranked the 5th highest in London for loneliness, with 1 in 6 adults living with a diagnosed mental health condition.

8.3 PART C: The London Borough of Islington – Housing stock and tenure

C1. The most recent stock condition survey (SCS) in Islington was in 2008³³. Relevant findings from that stock condition survey were as follows:

- the most common dwelling type was self-contained flats within converted pre-1919 terraced houses;
- around 90% of the PRS was in self-contained flats;
- 62.3% of private sector properties (excluding properties managed by Registered Social Landlords (RSLs) are pre-1919 stock ([Error! Reference source not found.](#)). This compares with 24.9% nationally and 34.2% in London at that time.

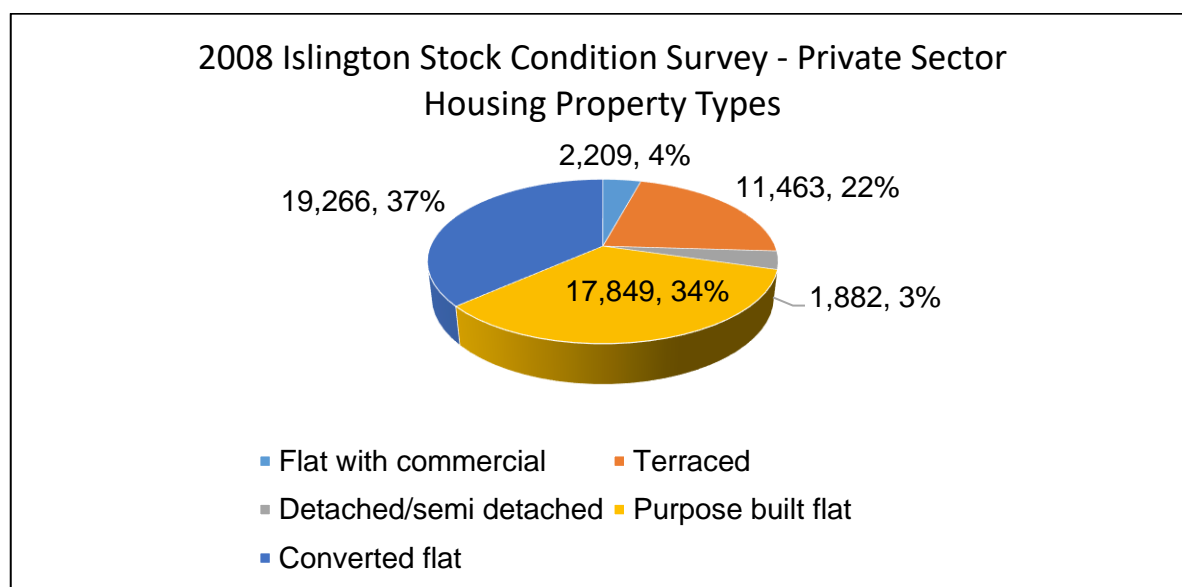


Figure 4. Housing property types – 2008 SCS.

C2. Research for the SCS indicated that:

- 3,547 (15.7%) PRS dwellings had at least one category 1 hazard and 9.5% had a category 2 hazard in band D and 11.2% in bands E to I;
- estimated costs to remedy category 1 hazards in the PRS was an average of £4,407 per dwelling and a borough-wide cost of £15.6m;
- estimated total cost of dealing with disrepair of PRS properties across Islington was £135.8m;
- vulnerable and support needs households in the private sector had considerably higher average basic repair costs at £2,628 and £4,356 per dwelling respectively;
- 29.6% of dwellings in the PRS failed the Decent Homes Standard;
- the average cost of remedying non-decent homes in the PRS was estimated to be £4,628 and for vulnerable households this figure was £6,421;
- 1,585 vulnerable households lived in non-decent accommodation in the PRS, which was 45.8% of all vulnerable households in the PRS;

³³ 2008 Stock Condition Survey. A comprehensive review of private housing in Islington. In partnership with Fordham Research.

- there were 2,653 converted buildings in the borough, containing 8,685 self-contained flats;
- there were 5,512 flats or houses in multiple occupation (Section 254 HMOs);
- in terms of energy efficiency, the average Standard Assessment Procedure (SAP) rating for the PRS in Islington was 61 (out of 100) and older dwellings typically demonstrated lower SAP ratings;
- 22.1% of all private sector households in the borough were in fuel poverty, rising to 35.4% of vulnerable households.

C3. There were 119,429 residential dwelling listed in the Islington Local Land and Property Gazetteer (LLPG) in September 2021.

C4. The 2011 Census showed the proportion of different tenures³⁴ shown in Table 6. Highbury West had the largest number of residential properties, followed by Bunhill and Holloway. Hillrise had the lowest number. Highbury West had the highest number of privately rented properties at 2,316, whilst Hillrise had the lowest at only 1,021. Wards with the highest level of social renting were Bunhill and Holloway. The wards with the highest level of owner occupation were Highbury East and Highbury West.

Table 6. Tenure of housing stock by ward – Census 2011.

| Ward | Owned: Total | Social rented: Total | Private rented: Total | Total stock |
|---------------|---------------|----------------------|-----------------------|---------------|
| Barnsbury | 1757 | 2132 | 1512 | 5401 |
| Bunhill | 1418 | 3173 | 1961 | 6552 |
| Caledonian | 1383 | 2733 | 1822 | 5938 |
| Canonbury | 1586 | 2694 | 1257 | 5537 |
| Clerkenwell | 1531 | 2237 | 1401 | 5169 |
| Finsbury Park | 1413 | 2711 | 1996 | 6120 |
| Highbury East | 2156 | 1629 | 1368 | 5153 |
| Highbury West | 2047 | 2339 | 2316 | 6702 |
| Hillrise | 1665 | 2294 | 1021 | 4980 |
| Holloway | 1488 | 3084 | 1737 | 6309 |
| Junction | 1605 | 2443 | 1449 | 5497 |
| Mildmay | 1598 | 2739 | 1360 | 5697 |
| St George's | 1822 | 2063 | 1413 | 5298 |
| St Mary's | 1494 | 2290 | 1642 | 5426 |
| St Peter's | 1843 | 2243 | 1333 | 5419 |
| Tollington | 1758 | 2538 | 1629 | 5925 |
| TOTAL | 26,564 | 39,342 | 25,217 | 91,123 |

³⁴ <https://www.nomisweb.co.uk/census/2011/ks402ew>

Table 7. Tenure of wards by percentage Census 2011.

| Ward | Owned: Total | Social rented: Total | Private rented: Total |
|----------------------|-------------------------|---------------------------------|----------------------------------|
| Barnsbury | 32.5% | 39.5% | 28.0% |
| Bunhill | 21.6% | 48.4% | 29.9% |
| Caledonian | 23.3% | 46.0% | 30.7% |
| Canonbury | 28.6% | 48.7% | 22.7% |
| Clerkenwell | 29.6% | 43.3% | 27.1% |
| Finsbury Park | 23.1% | 44.3% | 32.6% |
| Highbury East | 41.8% | 31.6% | 26.5% |
| Highbury West | 30.5% | 34.9% | 34.6% |
| Hillrise | 33.4% | 46.1% | 20.5% |
| Holloway | 23.6% | 48.9% | 27.5% |
| Junction | 29.2% | 44.4% | 26.4% |
| Mildmay | 28.0% | 48.1% | 23.9% |
| St George's | 34.4% | 38.9% | 26.7% |
| St Mary's | 27.5% | 42.2% | 30.3% |
| St Peter's | 34.0% | 41.4% | 24.6% |
| Tollington | 29.7% | 42.8% | 27.5% |

- C5. Table 8 shows the estimated PRS numbers and density for the new wards. The ward with the greatest density of PRS properties per square kilometre was St. Peter's & Canalside.

Table 8. Density of PRS by Islington ward.

| Ward | Private rented properties | Area in sq.km. | PRS density. Properties per sq. km. |
|------------------------|---------------------------|----------------|-------------------------------------|
| Arsenal | 2440 | 0.81 | 3000 |
| Barnsbury | 2010 | 0.90 | 2241 |
| Bunhill | 2523 | 0.84 | 2994 |
| Caledonian | 2669 | 0.88 | 3039 |
| Canonbury | 1695 | 0.86 | 1965 |
| Clerkenwell | 2259 | 0.93 | 2427 |
| Finsbury Park | 2489 | 0.84 | 2967 |
| Highbury | 2061 | 1.08 | 1907 |
| Hillrise | 1617 | 1.01 | 1602 |
| Holloway | 2006 | 0.78 | 2579 |
| Junction | 1844 | 1.06 | 1747 |
| Laycock | 1587 | 0.86 | 1842 |
| Mildmay | 2135 | 0.90 | 2369 |
| St Mary's & St James' | 2057 | 0.75 | 2740 |
| St Peter's & Canalside | 2032 | 0.65 | 3135 |
| Tollington | 2404 | 0.82 | 2945 |
| Tufnell Park | 1814 | 0.84 | 2148 |
| TOTAL | 35642 | 14.81 | 2407 |

- C6. As a borough with few open spaces, Islington, with 69.8 dwellings per hectare, is the second-most dense London borough for dwellings and over three times the London average and one and a half times the inner London average³⁵. There were estimated to be 103,740 dwellings in 2019, only the 20th highest in London³⁶, although the 2021 LLPG shows 119,429. The dwelling density per ward based upon the Census 2011 is in Table 9.

³⁵ Department for Levelling Up, Housing & Communities. <https://data.london.gov.uk/dataset/number-and-density-of-dwellings-by-borough>

³⁶ DCLG. <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Table 9. Dwelling density per ward. Census 2011.

| Ward | Total dwellings | Square kilometres | Dwellings per square kilometre |
|----------------------|-----------------|-------------------|--------------------------------|
| Highbury West | 6702 | 0.846 | 7922.0 |
| Holloway | 6309 | 0.81 | 7788.9 |
| Tollington | 5925 | 0.825 | 7181.8 |
| Mildmay | 5697 | 0.807 | 7059.5 |
| Caledonian | 5938 | 0.847 | 7010.6 |
| Canonbury | 5537 | 0.869 | 6371.7 |
| Clerkenwell | 5169 | 0.83 | 6227.7 |
| Bunhill | 6552 | 1.082 | 6055.5 |
| Hillrise | 4980 | 0.826 | 6029.1 |
| Barnsbury | 5401 | 0.916 | 5896.3 |
| St George's | 5298 | 0.935 | 5666.3 |
| Finsbury Park | 6120 | 1.089 | 5619.8 |
| St Peter's | 5419 | 1.004 | 5397.4 |
| St Mary's | 5426 | 1.028 | 5278.2 |
| Highbury East | 5153 | 1.009 | 5107.0 |
| Junction | 5497 | 1.138 | 4830.4 |
| TOTAL | 91,123 | 14.861 | 6,131.7 |

- C7. The median rent in Islington for all size lettings between 1 April 2020 and 31 March 2021 was £1,733, which is higher than the average for London at £1,572. The median rent in Islington from 2018-2019 was the 6th highest in London.³⁷
- C8. In 2019/20, on average, households in the private rented sector spent 32% (including housing benefit) of their income on rent; social renters spent on average, 27%. Some 8% of private renters were either currently in arrears or had been in the previous 12 months, compared with 22% of social renters.³⁸
- C9. The PRS has been expanding, not through any significant increase in supply but by replacing owner occupation (down from 3.3% between 2011 and 2016) and meeting the demands of a reduced supply of social housing (down 3%). However, there was a slight reversal towards owner occupation, with a reduction in the PRS from 2017 to 2018 to 29,800 properties, a trend that was reflected across London.³⁹ Islington had the 12th highest number of PRS properties in London in 2018. The PRS represented 27.4% of the housing stock in 2018, up from 25.6% in 2013. Islington has determined the likely percentage of PRS in 2021 to be 29.8%.
- C10. The PRS increased by around 5,700 properties over the period 2013 to 2018, an increase across all housing tenures in Islington, of 15.4%.⁴⁰

³⁷ Valuation Office Agency, June 2019.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/809641/London.pdf

³⁸ English Housing Survey 2019/20.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

³⁹ Office for National Statistics. Housing Tenure by Borough. <https://data.london.gov.uk/dataset/housing-tenure-borough>

⁴⁰ Office for National Statistics. Housing Tenure by Borough. <https://data.london.gov.uk/dataset/housing-tenure-borough>

- C11. According to the 2011 Census, every ward in Islington had greater than 20% of the properties in the PRS, ranging from 20.5% in Hillrise ward to 34.56% in Highbury West ward. Current data indicates the new Hillrise ward has 22.5% and the new Caledonian ward is now the highest at 41.2%.
- C12. 34% of Islington's population live in social housing, compared to 22.3% across London. This is the third highest percentage in London (2018).⁴¹
- C13. Islington Council owns and manages more than 35,400 council properties. In May 2018, the stock comprises 25,349 tenanted and approximately 11,000 leasehold properties. It was suspected that 889 of these are sublet and between April 2015 and March 2021 and possession was obtained for subletting 346 properties.
- C14. Partners for Improvement in Islington manage 6,342 tenanted and leasehold street properties and 3,103 properties are managed by Tenant Management Organisations
- C15. There were 29,161 housing benefit claimants in Islington in 2021, with a total of 1,727 confirmed to be in the PRS and a further 460 claimants living out of borough. Figure 5 shows the number of claimants per new ward. The highest number of claimants are in Finsbury Park and Tollington wards.

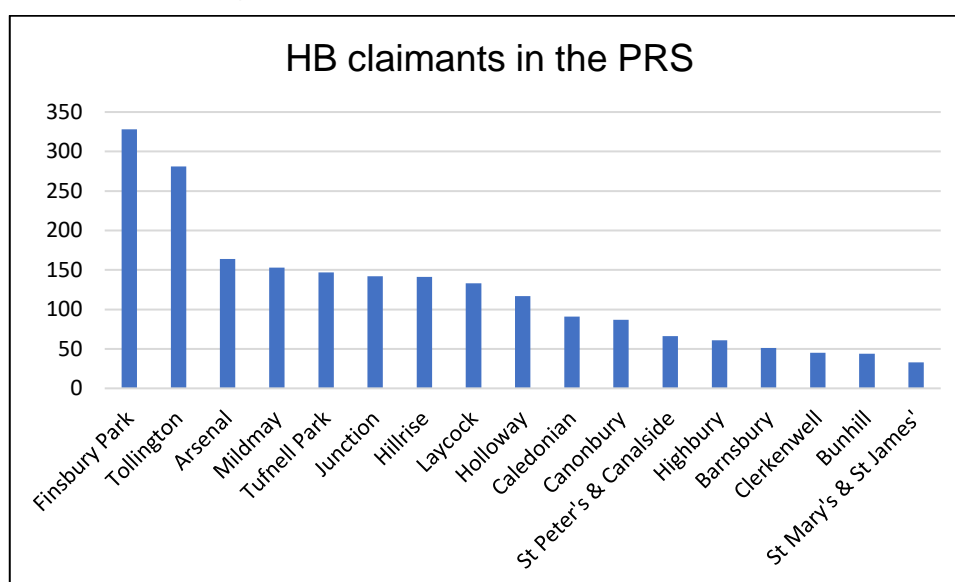


Figure 5. Housing benefit claimants in the PRS by ward.

Property age profile

- C16. Older properties tend to have the greatest problems relating to housing conditions and disrepair. Around 49% of dwellings in Islington were built pre-1939. Table 10 shows the number of properties across different build periods.⁴²

⁴¹ Office for National Statistics. Housing Tenure by Borough. <https://data.london.gov.uk/dataset/housing-tenure-borough>

⁴² <https://data.london.gov.uk/dataset/property-build-period-isoa>

Table 10. Number of properties in Islington in different build periods.

| Build period | Number of properties |
|--------------|----------------------|
| Pre 1900 | 38,360 |
| 1900 to 1918 | 8,060 |
| 1919 to 1929 | 1,450 |
| 1930 to 1939 | 3,000 |
| 1945 to 1954 | 5,610 |
| 1955 to 1964 | 6,250 |
| 1965 to 1972 | 7,100 |
| 1973 to 1982 | 10,740 |
| 1983 to 1992 | 2,410 |
| 1993 to 1999 | 3,160 |
| 2000 to 2009 | 9,790 |
| 2010 to 2012 | 3,980 |
| Unknown | 3,730 |
| TOTAL | 103,640 |

C17. Figure 6 shows the cumulative total of all dwelling build periods by existing ward. Pre-1900 is by far the most common build period, with more in this age band than any other across every ward. Barnsbury, Clerkenwell, Finsbury Park, Highbury East, Highbury West, Mildmay, St. George's, St. Mary's and Tollington each have over 3,000 pre-1945 properties.

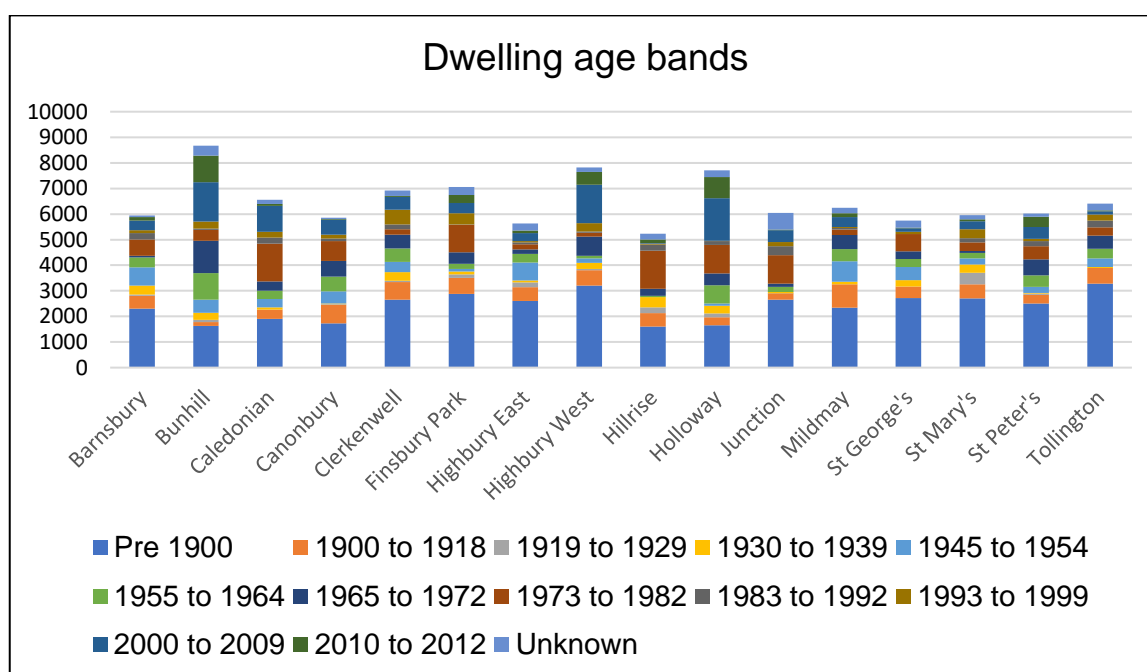


Figure 6. Dwelling age bands per ward.

C18. Figure 7 shows the percentage of all dwellings per ward that were built pre-1945. Ten out of sixteen wards have over 50% of dwellings in these older age bands. Clearly the property profile across Islington is one of older properties. The link between older properties and higher levels of disrepair leads us to believe that there are high numbers of properties across the borough that are likely to have issues of disrepair, including those in the PRS.

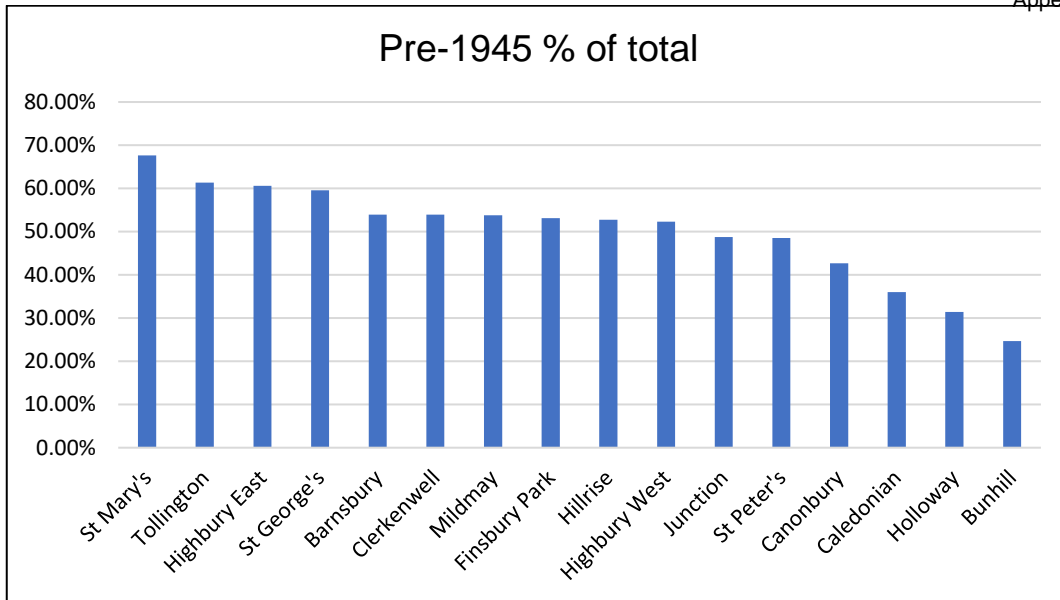
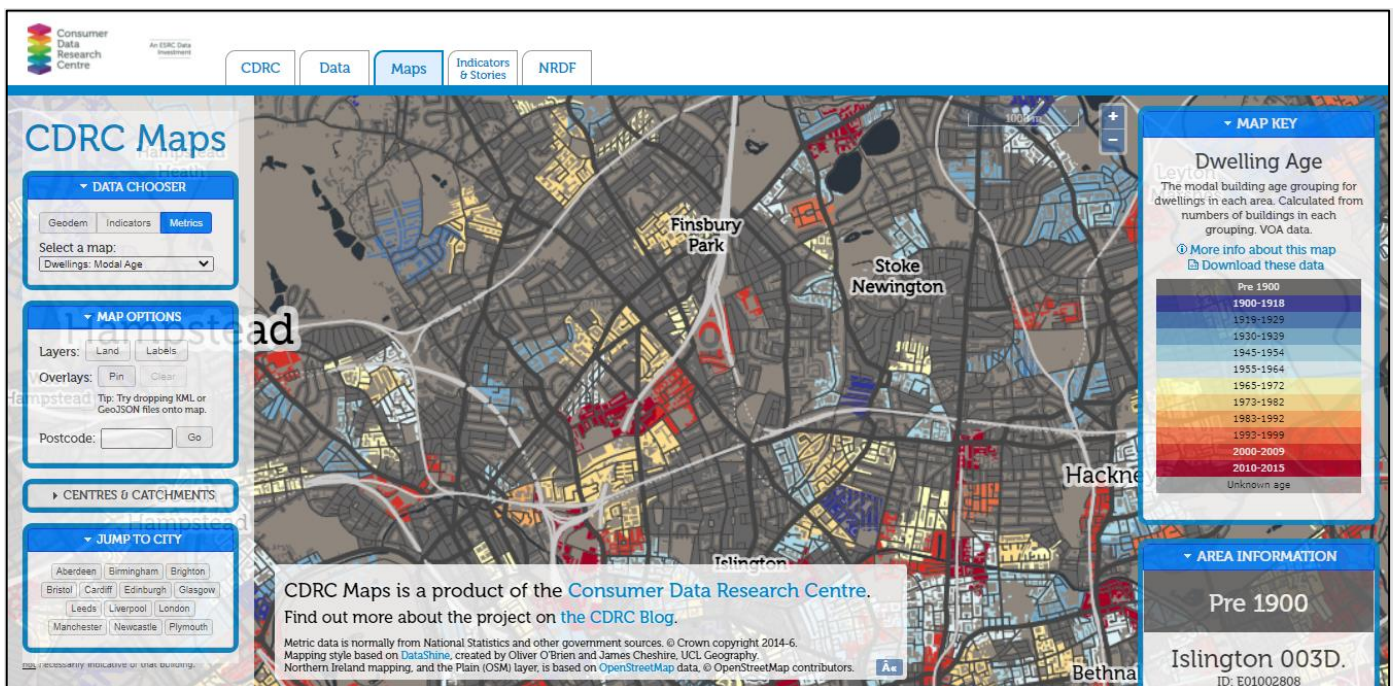


Figure 7. Pre-1945 properties by ward.

C19. Data from the Consumer Data Research Centre⁴³ provides dwelling age indication on maps. Map 6 shows pre-1900 dwellings in dark grey. There significant areas of dark grey across the localities that include Junction, Hillrise, Tollington, Tufnell Park and Arsenal Wards. Indeed, dark grey is the most common shading in all these wards. Holloway and Caledonian have less pre-1900 properties by comparison, but still had 1,660 and 1,910 properties respectively in the 2011 Census.



Map 6. CDRC Map indicating dwelling age to the north of the borough.

⁴³ <https://maps.cdrc.ac.uk/#/metrics/dwellingage/default/BTTTTFT/14/-0.1157/51.5598/>

Identification of the PRS

- C20. The PRS is made up of houses in multiple occupation (HMOs) and other privately rented properties let to single families and those occupied by no more than two persons who do not form a single household. For the purposes of this consultation report, a PRS property that is not an HMO is described as a Single Family Occupied property (SFO) and this description will also include properties occupied by two households.
- C21. To estimate the current size and location of PRS properties the 2011 Census data has been used as a baseline dataset and supplemented by:
- council records, such as housing benefit, council tax and electoral registration;
 - the three national registered tenancy deposit schemes (TDS);
 - properties on the Environmental Health database that have already had some form of intervention from the council.

Identification of HMOs

- C22. To identify the numbers of SFOs that any selective licensing scheme would apply to, it is necessary to identify which PRS properties are HMOs. Potential HMOs were identified from the following sources:
- the HMO licence register and applications database
 - TDS records with three or more deposits held for one address
 - council tax records of properties exempt due to being occupied by persons in full time education and where there are three or more different surnames on the Electoral Register (likely student lets)
 - TDS records where there are three or more different surnames on the Electoral Register
 - other council data sources.
- C23. Analysis of the data sets shows that there are approximately **6151** HMOs in the borough.
- C24. Table 11 shows the estimated numbers of privately rented properties that are HMOs in each of the new ward boundaries and the percentage of dwellings that are estimated to be HMOs in each ward.

Table 11. Estimated numbers of HMOs.

| Ward | Estimated number of HMOs | Total housing stock | Percentage of HMO |
|------------------------|--------------------------|---------------------|-------------------|
| Tollington | 577 | 7174 | 8.0% |
| Finsbury Park | 447 | 7652 | 5.8% |
| Highbury | 443 | 7043 | 6.3% |
| Arsenal | 423 | 6818 | 6.2% |
| Mildmay | 423 | 7279 | 5.8% |
| Hillrise | 421 | 7190 | 5.9% |
| Tufnell Park | 420 | 6601 | 6.4% |
| Junction | 378 | 7070 | 5.4% |
| Canonbury | 354 | 6644 | 5.3% |
| St Mary's & St James' | 348 | 6635 | 5.2% |
| Caledonian | 344 | 6475 | 5.3% |
| Holloway | 330 | 6729 | 4.9% |
| Barnsbury | 285 | 6700 | 4.3% |
| Laycock | 272 | 6532 | 4.2% |
| St Peter's & Canalside | 235 | 8204 | 2.9% |
| Clerkenwell | 232 | 7056 | 3.3% |
| Bunhill | 219 | 7627 | 2.9% |
| TOTAL | 6,151 | 119,429 | 5.2% |

Identification of SFOs

- C25. The estimated number of SFO properties were identified using the following sources:
- housing benefit records where the property is identified as privately rented
 - TDS records with no more than two deposits held for the address
 - other council data sources
 - Environmental Health database of complaints and intervention
- C26. The analysis of the data indicates that there are an estimated **29,491** SFOs in the borough. The LLPG holds records of 119,429 residential addresses, so the number of potentially SFO private rented properties is approximately **24.7%** of the dwelling stock in the borough.
- C27. Table 12 shows the numbers of the identified potential SFOs by new ward. The greatest numbers are in Caledonian Ward.

Table 12. Number of potential SFOs by ward.

| Ward | Estimated number of SFO's | Total housing stock |
|------------------------|---------------------------|---------------------|
| Arsenal | 2017 | 6818 |
| Barnsbury | 1725 | 6700 |
| Bunhill | 2304 | 7627 |
| Caledonian | 2325 | 6475 |
| Canonbury | 1341 | 6644 |
| Clerkenwell | 2027 | 7056 |
| Finsbury Park | 2042 | 7652 |
| Highbury | 1618 | 7043 |
| Hillrise | 1196 | 7190 |
| Holloway | 1676 | 6729 |
| Junction | 1466 | 7070 |
| Laycock | 1315 | 6532 |
| Mildmay | 1712 | 7279 |
| St Mary's & St James' | 1709 | 6635 |
| St Peter's & Canalside | 1797 | 8204 |
| Tollington | 1827 | 7174 |
| Tufnell Park | 1394 | 6601 |
| TOTAL | 29,491 | 119,429 |

- C28. The estimated number of HMO's and SFOs indicates that there are **35,642** properties that are privately rented. There were 25,217 in the 2011 Census which suggest that there has been an increase in the numbers of PRS properties of some 10,425 (41.3%). The PRS, including HMOs amounts to **29.8%** of all housing stock in the borough.
- C29. Table 13 compares the estimated number of PRS properties (both SFOs and HMOs) with the data from the 2011 Census, and the percentage change. All data is based on existing ward boundaries. Every has seen at least a 17% increase in PRS. Caledonian Ward has seen the largest increase at 71%. There has been an overall increase of 41.34% in the numbers of PRS properties in 10 years.

Table 13. Comparison of 2021 PRS with 2011 Census.

| Ward | Potential HMOs | Potential SFOs | Total potential PRS 2021 | PRS Census 2011 | PRS Percentage change |
|---------------|----------------|----------------|--------------------------|-----------------|-----------------------|
| Barnsbury | 254 | 1551 | 1805 | 1512 | 19.4% |
| Bunhill | 316 | 3029 | 3345 | 1961 | 70.6% |
| Caledonian | 417 | 2699 | 3116 | 1822 | 71.0% |
| Canonbury | 322 | 1287 | 1609 | 1257 | 28.0% |
| Clerkenwell | 234 | 2016 | 2250 | 1401 | 60.6% |
| Finsbury Park | 569 | 2423 | 2992 | 1996 | 49.9% |
| Highbury East | 392 | 1507 | 1899 | 1368 | 38.8% |
| Highbury West | 548 | 2548 | 3096 | 2316 | 33.7% |
| Hillrise | 323 | 872 | 1195 | 1021 | 17.0% |
| Holloway | 398 | 1988 | 2386 | 1737 | 37.4% |
| Junction | 366 | 1440 | 1806 | 1449 | 24.6% |
| Mildmay | 405 | 1517 | 1922 | 1360 | 41.3% |
| St George's | 420 | 1394 | 1814 | 1413 | 28.4% |
| St Mary's | 352 | 1863 | 2215 | 1642 | 34.9% |
| St Peter's | 326 | 1786 | 2112 | 1333 | 58.4% |
| Tollington | 509 | 1571 | 2080 | 1629 | 27.7% |
| TOTAL | 6,151 | 29,491 | 35,642 | 25,217 | 41.3% |

2018 Property Survey

- C30. In addition to the analysis of council data sources as a means of identifying how many PRS properties there are in Islington, a physical survey was conducted during 2018 to provide some direct evidence of both the numbers of PRS properties and also the condition of the properties and any problems associated with them.
- C31. The existing Finsbury Park ward was selected for this survey – a ward where there was a known high level of PRS properties from the 2011 Census and one that was also known to have high levels of property complaints. Later in this consultation document, the findings of this survey are used to extrapolate likely numbers of PRS properties that may have problems associated with them.
- C32. The survey identified a total of 338 properties for investigation, selected at random, based upon a list produced from council tax records that indicated likely PRS (a total of 1,443 properties) and from a list of properties registered with one of the tenancy deposit schemes.
- C33. Of the 328 properties surveyed, entry was gained to a total of 114 PRS properties. For these properties, a survey form was completed to gather data such as tenure, occupancy and any problems associated with the property. For those properties where entry was not gained, an external assessment was used to identify where possible the tenure and any external problems, such as disrepair, general condition, and any refuse within the curtilage.
- C34. As previously mentioned earlier in this document, the existing Finsbury Park ward was subsequently designated for a selective licensing scheme. Table 14 shows the break-down of the tenure/occupancy type of the properties found in the survey and the projected

number across the ward, based upon the total number of dwellings identified in the 2011 Census for Finsbury Park, where 1,996 out of . (This is based upon the existing Finsbury Park ward boundary.)

Table 14. Number of property types in Finsbury Park survey and projected total numbers.
Number of properties surveyed: 328
Number of properties where entry gained or data gathered: 314

| | Number identified | Percentage of sample where data gathered | Projected number for ward based upon Housing Stock (2011 Census) |
|------------------------------|--------------------------|---|---|
| HMOs identified S254 | 30 | 9.5% | 581 |
| HMOs identified S257 | 33 | 10.5% | 643 |
| SFO PRS properties - not HMO | 114 | 36.3% | 2,222 |
| Owner occupied or other | 137 | 43.6% | 2,668 |

C35. Looking at the 2021 PRS analysis for the existing ward of Finsbury Park, the number of S254 HMOs estimated from the survey appears to be accurate. The SFO projection for Finsbury Park from the survey appears to be a slight underestimate, with the 2021 PRS analysis indicating around 2,423 SFOs.

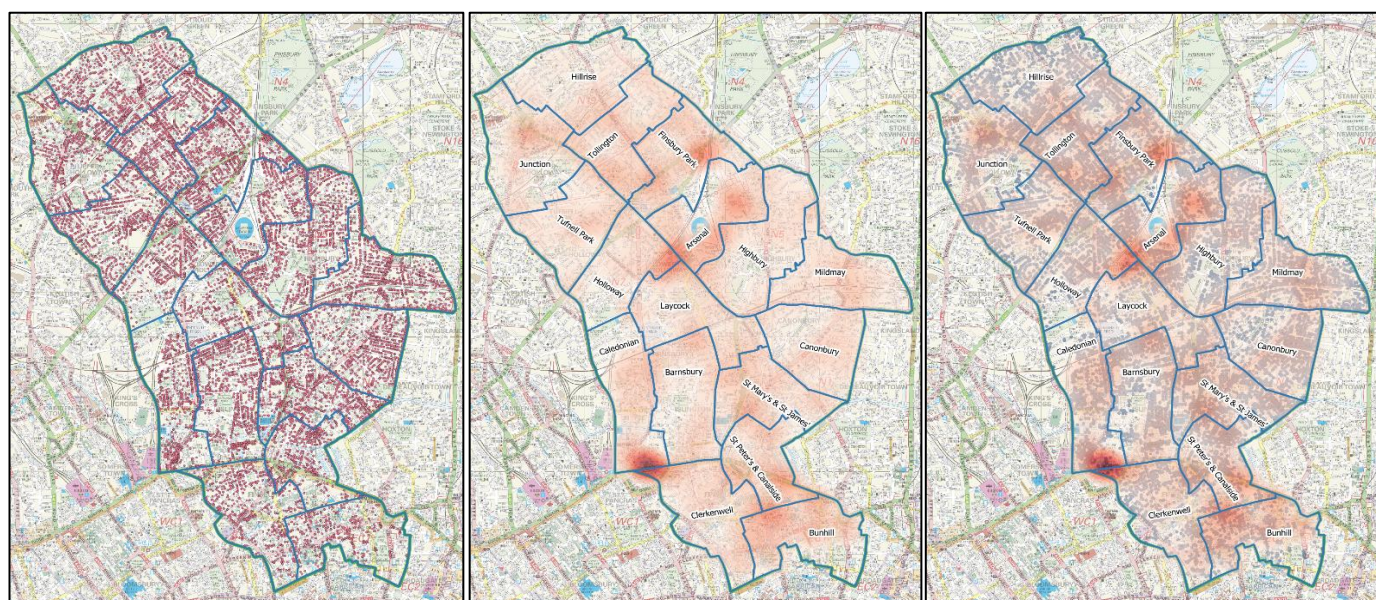
Total PRS 2021 Estimate

C36. Table 15 shows the predicted number of PRS properties per new ward established from the PRS analysis alongside the number of dwellings recorded on the council's local land and property gazetteer (LLPG). The overall percentage of PRS for Islington is estimated to be 29.84%, with Caledonian ward having the highest at 41.22% and Hillrise ward the lowest at 22.49%.

Table 15. Potential PRS properties and percentage per new ward.

| Ward | Potential PRS | Total Dwellings (LLPG) | PRS % |
|------------------------|---------------|------------------------|--------------|
| Arsenal | 2440 | 6818 | 35.8% |
| Barnsbury | 2010 | 6700 | 30.0% |
| Bunhill | 2523 | 7627 | 33.0% |
| Caledonian | 2669 | 6475 | 41.2% |
| Canonbury | 1695 | 6644 | 25.5% |
| Clerkenwell | 2259 | 7056 | 32.0% |
| Finsbury Park | 2489 | 7652 | 32.5% |
| Highbury | 2061 | 7043 | 29.3% |
| Hillrise | 1617 | 7190 | 22.5% |
| Holloway | 2006 | 6729 | 29.8% |
| Junction | 1844 | 7070 | 26.0% |
| Laycock | 1587 | 6532 | 24.3% |
| Mildmay | 2135 | 7279 | 29.3% |
| St Mary's & St James' | 2057 | 6635 | 31.0% |
| St Peter's & Canalside | 2032 | 8204 | 24.8% |
| Tollington | 2404 | 7174 | 33.5% |
| Tufnell Park | 1814 | 6601 | 27.5% |
| TOTAL | 35,642 | 119,429 | 29.8% |

C37. Map 7 shows the distribution of the PRS identified through this analysis as heat maps set on the new ward boundaries. The left-hand map shows the PRS properties as red dots. The middle map shows the concentrations of properties with orange shading as a heat map indicating the level of concentration of cases. The right-hand map shows the heat map overlaid on the dots. It should be noted that multiple dwellings in one building result in dots upon dots. The 'hot' area in the heat map in the south of Caledonian ward is due to multiple student accommodation buildings.



Map 7. Potential PRS mapped on new wards.

8.4 PART D: Proportion of property in the PRS

- D1. To show that the proportion of property in the private rented sector is a relevant criterion for the area proposed for a selective licensing designation, it must be demonstrated that the area has a high proportion of property in the private rented sector.⁴⁴
- D2. Guidance suggests that a high proportion of PRS properties would be more than the average proportion in the most recent English Housing Survey. The current English Housing Survey puts the national average of PRS properties at 19%.⁴⁵ Therefore, if privately rented properties account for greater than 19% of the total housing stock, the area can be considered as having a high proportion of PRS.
- D3. Looking at the profile of the borough, from the 2011 Census⁴⁶, the whole borough contained 27.46% PRS. Table 16 shows the number and percentage of PRS properties per ward as per the 2011 Census.

Table 16. Number and percentage of PRS by ward - Census 2011

| Ward | PRS - Number 2011 Census | Total Dwellings | PRS - % 2011 Census |
|---------------|--------------------------|-----------------|---------------------|
| Barnsbury | 1512 | 5401 | 28.0% |
| Bunhill | 1961 | 6552 | 29.9% |
| Caledonian | 1822 | 5938 | 30.7% |
| Canonbury | 1257 | 5537 | 22.7% |
| Clerkenwell | 1401 | 5169 | 27.1% |
| Finsbury Park | 1996 | 6120 | 32.6% |
| Highbury East | 1368 | 5153 | 26.6% |
| Highbury West | 2316 | 6702 | 34.6% |
| Hillrise | 1021 | 4980 | 20.5% |
| Holloway | 1737 | 6309 | 27.5% |
| Junction | 1449 | 5497 | 26.4% |
| Mildmay | 1360 | 5697 | 23.9% |
| St George's | 1413 | 5298 | 26.7% |
| St Mary's | 1642 | 5426 | 30.3% |
| St Peter's | 1333 | 5419 | 24.6% |
| Tollington | 1629 | 5925 | 27.5% |
| TOTAL | 25,217 | 91,123 | 27.67% |

- D4. Breaking the borough down into wards, every ward had greater than 19% PRS, ranging from 20.5% in Hillrise ward to 34.56% in Highbury West ward, meaning that every ward could individually be considered for designation.
- D5. The analysis of likely PRS properties in [Part C](#) identified 29.8% PRS when compared against the number of dwellings on the LLPG. **Error! Reference source not found.** shows the numbers and percentages of PRS by existing ward from that estimation.

⁴⁴ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 - Article 3 (1) (a)

⁴⁵ English Housing Survey 2019-20

⁴⁶ <https://www.nomisweb.co.uk/census/2011/ks402ew>

Table 17. Analysis of percentage of PRS per existing ward - 2021 estimate

| Ward | Private Rented - 2021 estimate | Total Dwellings - 2021 estimate | PRS % - 2021 estimate |
|---------------|--------------------------------|---------------------------------|-----------------------|
| Barnsbury | 1805 | 6449 | 28.0% |
| Bunhill | 3345 | 11187 | 29.9% |
| Caledonian | 3116 | 8139 | 38.3% |
| Canonbury | 1609 | 6270 | 25.7% |
| Clerkenwell | 2250 | 6919 | 32.5% |
| Finsbury Park | 2992 | 8697 | 34.4% |
| Highbury East | 1899 | 6334 | 30.0% |
| Highbury West | 3096 | 8873 | 34.9% |
| Hillrise | 1195 | 5728 | 20.9% |
| Holloway | 2386 | 8665 | 27.5% |
| Junction | 1806 | 6882 | 26.2% |
| Mildmay | 1922 | 6743 | 28.5% |
| St George's | 1814 | 6601 | 27.5% |
| St Mary's | 2215 | 6904 | 32.1% |
| St Peter's | 2112 | 8069 | 26.2% |
| Tollington | 2080 | 6969 | 29.9% |
| TOTAL | 35,642 | 119,429 | 29.8% |

- D6. Table 18 presents the PRS percentage against the new wards. Taking Finsbury Park ward as an example, the ward boundary changes result in the number of both total dwellings and PRS properties reducing compared with the existing boundaries in [Error! Reference source not found.](#) above. The percentage of PRS in this ward also reduces under the new boundaries. On the other hand, for example, for Hillrise ward, the number of total dwellings and PRS increases under the new ward boundaries and the percentage of PRS also increases. These variations are seen across the borough due to the boundary changes and the increase in number of total wards.

Table 18. Analysis of percentage of PRS per new ward.

| Ward | Private Rented | Total Dwellings (LLPG) | PRS % |
|------------------------|----------------|------------------------|--------------|
| Arsenal | 2440 | 6818 | 35.8% |
| Barnsbury | 2010 | 6700 | 30.0% |
| Bunhill | 2523 | 7627 | 33.1% |
| Caledonian | 2669 | 6475 | 41.2% |
| Canonbury | 1695 | 6644 | 25.5% |
| Clerkenwell | 2259 | 7056 | 32.0% |
| Finsbury Park | 2489 | 7652 | 32.5% |
| Highbury | 2061 | 7043 | 29.3% |
| Hillrise | 1617 | 7190 | 22.5% |
| Holloway | 2006 | 6729 | 29.8% |
| Junction | 1844 | 7070 | 26.1% |
| Laycock | 1587 | 6532 | 24.3% |
| Mildmay | 2135 | 7279 | 29.3% |
| St Mary's & St James' | 2057 | 6635 | 31.0% |
| St Peter's & Canalside | 2032 | 8204 | 24.8% |
| Tollington | 2404 | 7174 | 33.5% |
| Tufnell Park | 1814 | 6601 | 27.5% |
| TOTAL | 35,642 | 119,429 | 29.8% |

- D7. The following designation is being considered against the 2021 PRS analysis undertaken for this consultation according to the new ward boundaries.
- D8. Table 19 shows the expected percentage of PRS in the designation, the new wards of Finsbury Park, Hillrise and Tollington, using the 2021 PRS analysis. These wards are both individually and collectively above 19% PRS. At just under 30% this area has a high percentage of PRS properties.

Table 19. Percentage of PRS in the proposed Designation 1.

| New ward | Number of expected PRS properties | Total dwellings on LLPG | PRS as % of total housing in ward area |
|-----------------|-----------------------------------|-------------------------|--|
| Finsbury Park | 2489 | 7652 | 32.5% |
| Hillrise | 1617 | 7190 | 22.5% |
| Tollington | 2404 | 7174 | 33.5% |
| Combined | 6,510 | 22,016 | 29.6% |

Proportion of property in PRS - Conclusions

- D9. Analysis of the recently gathered PRS analysis demonstrates that each of the proposed designation areas and the wards within them individually have greater than 19% PRS and so are suitable for designation in accordance with Article 3 (1) (a) of the Selective Licensing of Houses (Additional Conditions) (England) Order 2015.

8.5 PART E: Poor Property Conditions

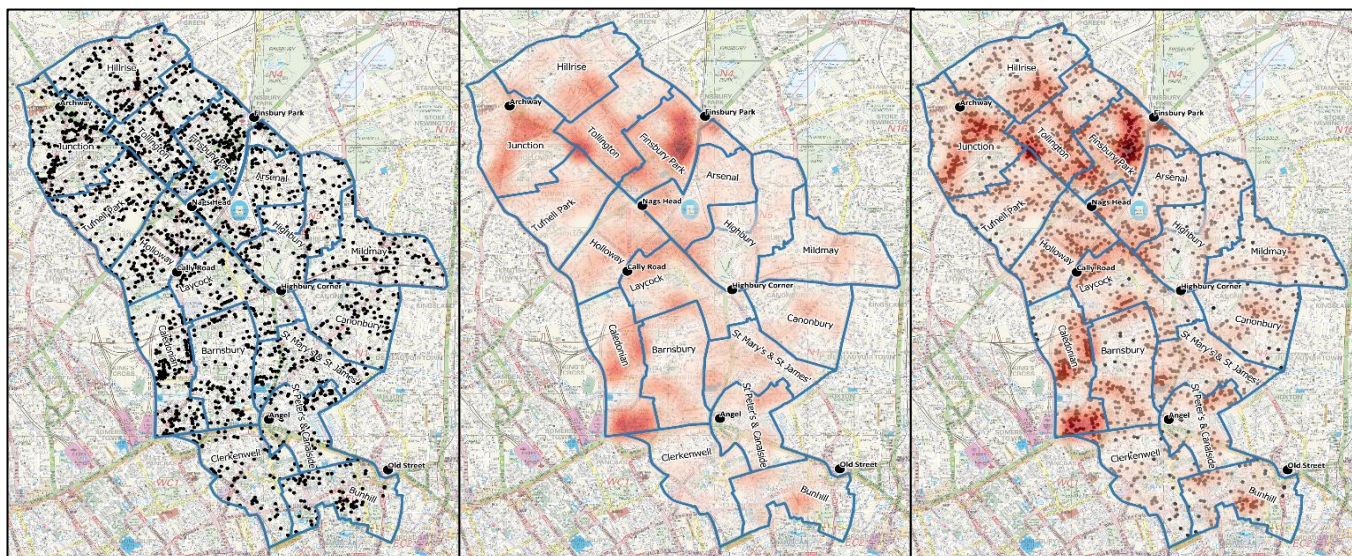
- E1. To show that poor property conditions is a relevant criterion for the designation of a selective licensing scheme, it must be demonstrated that the local housing authority considers it would be appropriate for a considerable number of the properties referred to in article 3(1)(a) to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises. The local housing authority must intend to carry out such inspections with a view to carrying out any necessary enforcement action⁴⁷⁴⁸
- E2. The guidance⁴⁹ suggests that a significant number of properties in the private rented sector should be in poor condition and are adversely affecting the character of the area and/or the health and safety of their occupants. Authorities should consider the following factors to help determine whether there are poor property conditions in their area:
- the age and visual appearance of properties in the area and that a high proportion of those properties are in the private rented sector;
 - a significant number of properties in the private rented sector need to be inspected in order to determine whether any of those properties contain category 1 or 2 hazards (more than a small number, although it does not have to be a majority of the private rented stock in the sector).
- E3. In terms of the age of properties, the Census 2011 indicated that 45% of properties in Islington were built before 1919. The English Housing Survey 2019-2020 shows that in England the private sector had the highest proportion of older dwellings with 23% of properties being built pre-1919. Islington therefore has a significantly higher proportion of older properties, which tend to suffer more issues in terms of poor conditions. With an average level of private renting in Islington at almost 30%, it is reasonable to predict that there is a high proportion of those properties that are older and so in poor condition. Indeed, 45% of the projected private sector in Islington would mean 16,039 pre-1919 properties being privately rented. The full analysis of the age profile of dwellings can be found in [Part C](#), paragraphs C16 – C19 and the levels of private renting in [Part C](#), paragraph C36.
- E4. In order to establish if there are a significant number of properties that need to be inspected for category 1 or 2 hazards, the council first looked at the following available data from between the period September 2014 and March 2020. The end date was selected because inspection activity after March 2020 was severely impacted by the pandemic and so is not representative and data could be distorted.
- E5. The council's database was used to review the information available about the condition of private rented properties:
- the numbers and proportions of complaints about the condition of private rented properties, looking at;
 - disrepair etc. including overcrowding

⁴⁸ Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – Article 4 (a)

⁴⁹ Department for Communities and Local Government. Selective licensing in the private rented sector A Guide for local authorities

- nuisance affecting both occupiers and neighbouring premises, including pests, rubbish, and drainage;
- the numbers and proportions of category 1 and 2 hazards found;
- the numbers and proportions of properties requiring enforcement actions;
- the numbers and proportions of properties where enforcement notices were served;
- projections based upon the findings of the 2018 Finsbury Park ward survey.

E6. **Error! Reference source not found.** shows the distribution of all known SFOs that have had a complaint, inspection, or enforcement, mapped on the new ward boundaries. The left-hand map shows the cases in black dots. The middle map shows the concentrations of cases, with orange shading as a heat map, the darkest areas are those with the highest concentration. The right-hand map shows the heat map overlaid on the dots. It can be seen the greatest concentrations are to the north and west of the borough.



Map 8 All SFO properties that have had a complaint, inspection, or enforcement on the EH database, mapped on new wards.

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Complaints

- E7. Between September 2014 and March 2020, the council received **3,168** complaints about poor housing conditions in the PRS. A rate of approximately 10% of the PRS, based upon 2011 Census numbers of PRS properties.
- E8. Table 20 shows the number of complaints received across the borough during this period. Although it has fluctuated and decreased in 2017/18, there are persistently around 500 plus complaints across the borough.

Table 20. Total number of complaints 2014-2020.

| Year | Number of complaints received |
|---------------------------------|-------------------------------|
| 2014 (Sep-Dec) | 258 |
| 2015 | 574 |
| 2016 | 523 |
| 2017 | 516 |
| 2018 | 566 |
| 2019 | 568 |
| 2020 (Jan-Mar) | 163 |
| Average per annum | 549 |
| Total (5 years 7 months) | 3,168 |

E9. Figure 8 shows the combined total number of property complaints per ward. The borough average number of complaints was 186 per ward which is shown as the green horizontal line. Finsbury Park, Junction, Caledonian, Tollington, Laycock, Hillrise, Arsenal and Holloway were either average or above average. In each ward 'condition of housing' was by far the most frequent type of complaint, accounting for 71%, with complaints about 'pests' the second highest at 8.2%.

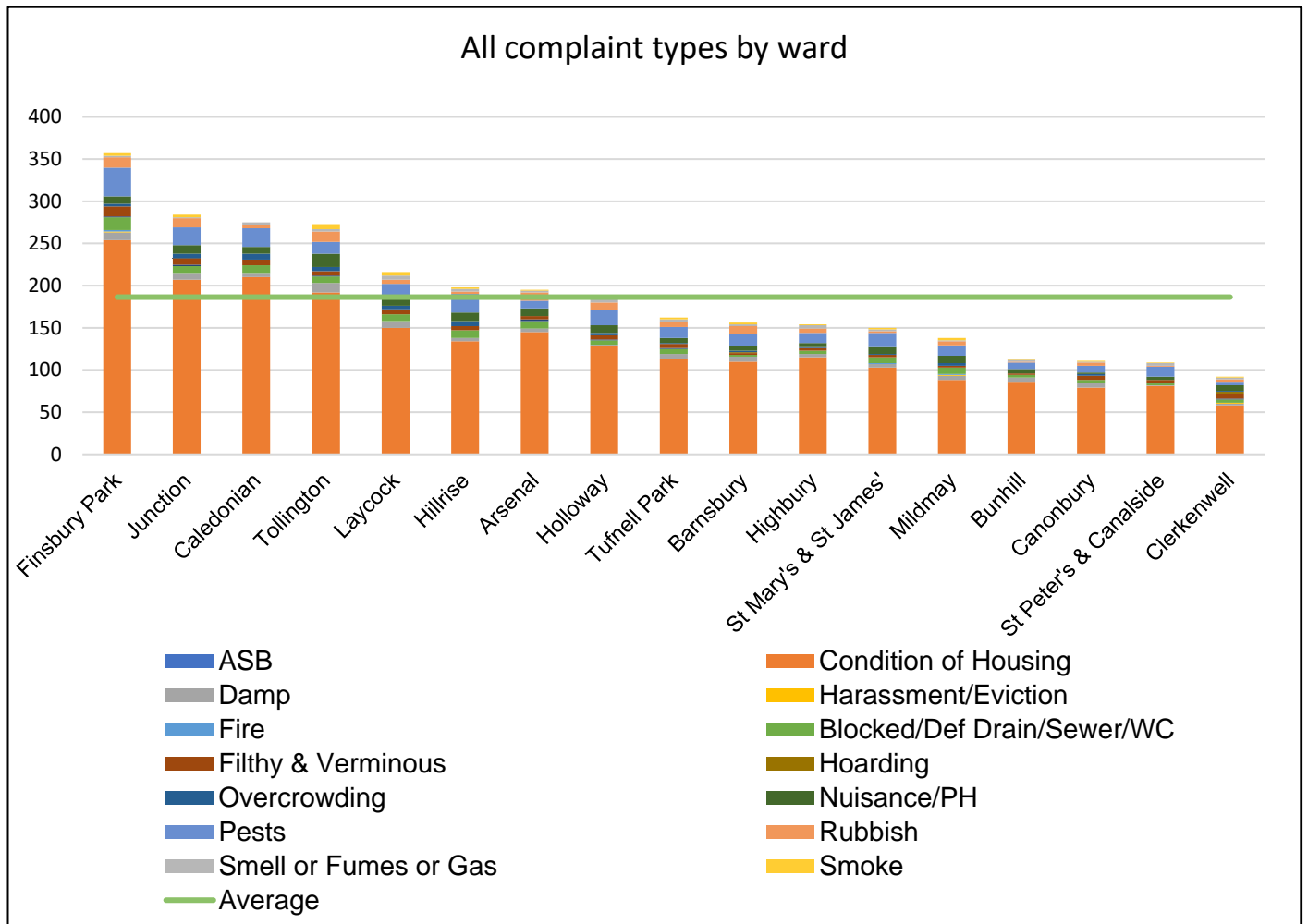


Figure 8. Total number of complaints by ward.

Complaints about disrepair, damp, fire and overcrowding

- E10. **2,390** complaints were made about disrepair, damp, fire and overcrowding at **2,005** unique addresses. Of these complaints, in **1,985** cases the investigating officer identified an issue that required follow up action, ranging from informal advice to formal action such as serving statutory notices or prosecution. A further 49 properties were still under investigation and had no outcome recorded at the time of the data analysis. However, based upon those that did have an outcome recorded, there were **83%** of complaints that required some action, even if it was resolved informally. **906** cases required some form of formal intervention, meaning that **38%** of all properties complained about in relation to poor conditions resulted in a formal action.
- E11. Figure 9 shows the number of all complaints about conditions (property condition, damp, overcrowding and fire) by ward. The seven wards of **Finsbury Park, Caledonian, Junction, Tollington, Laycock, Arsenal and Hillrise** (highlighted red) were above the average of 140 complaints per ward.

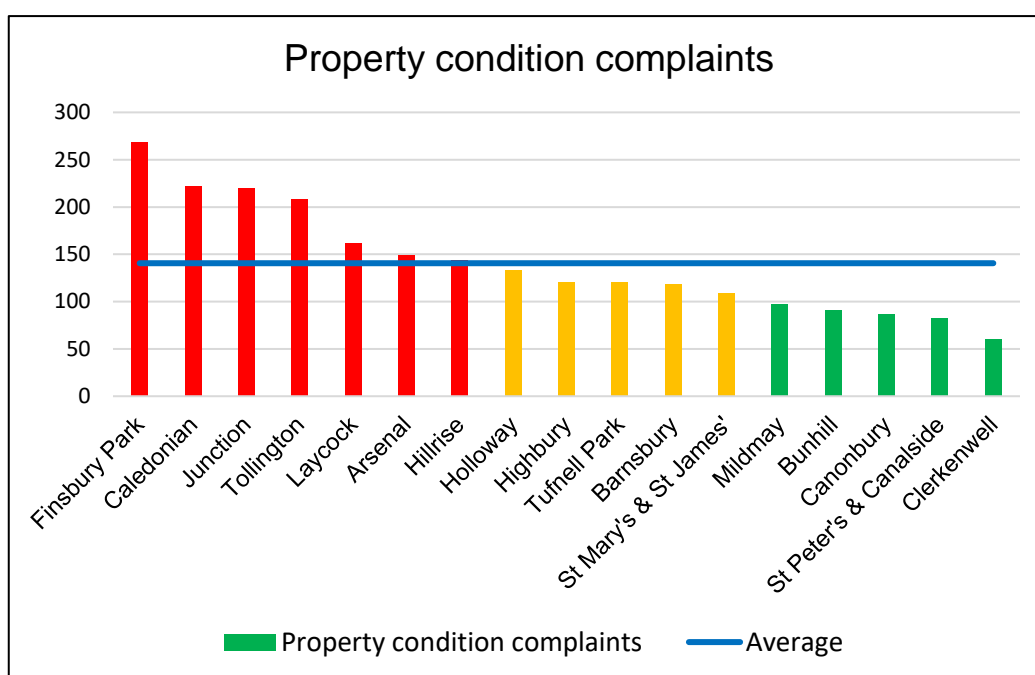


Figure 9. Property condition complaints by ward, including disrepair, damp, overcrowding and fire.

- E12. Figure 10 shows the condition complaints by ward for unique addresses. The average is 117 addresses per ward, with the same seven wards above average (highlighted red). Finsbury Park had 39 properties with repeat complaints, down to St. Mary's & St. James' with 21 repeats.

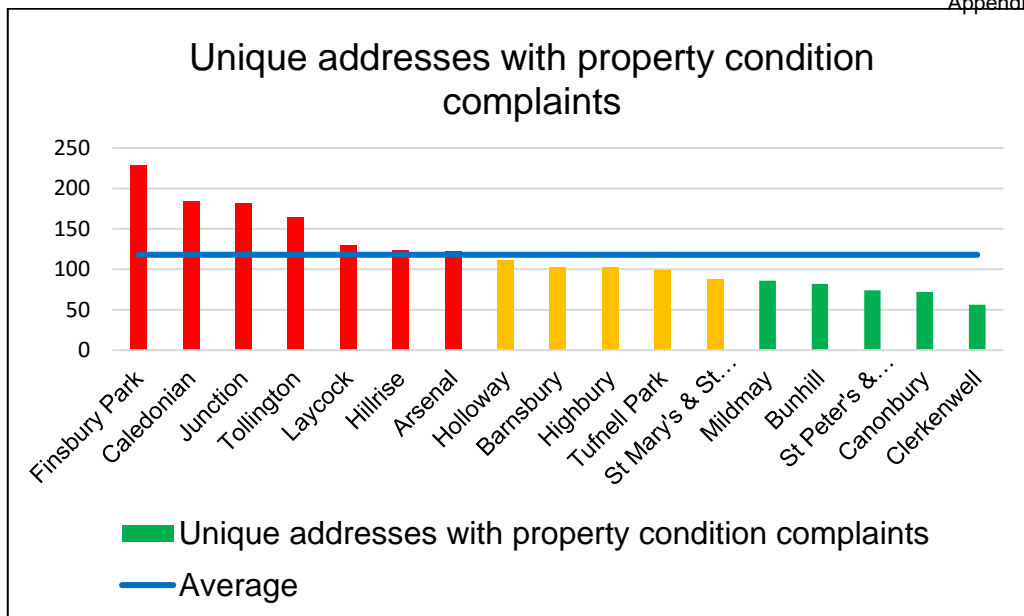


Figure 10. Unique addresses with property condition complaints by ward.

- E13. Following inspection in response to a complaint, if an issue is identified that requires rectification, the council will take follow up action. Follow-up action can take the form of informal advice or warnings, to service of statutory notices requiring works, and/or prosecution. Of the 83% of complaints where some action was required, the number of cases per ward is shown in Figure 11. The average number of cases requiring landlord action was 116 per ward (blue horizontal line).
- E14. Finsbury Park, Caledonian, Junction, Tollington, Laycock, Hillrise and Arsenal (highlighted red) above average.

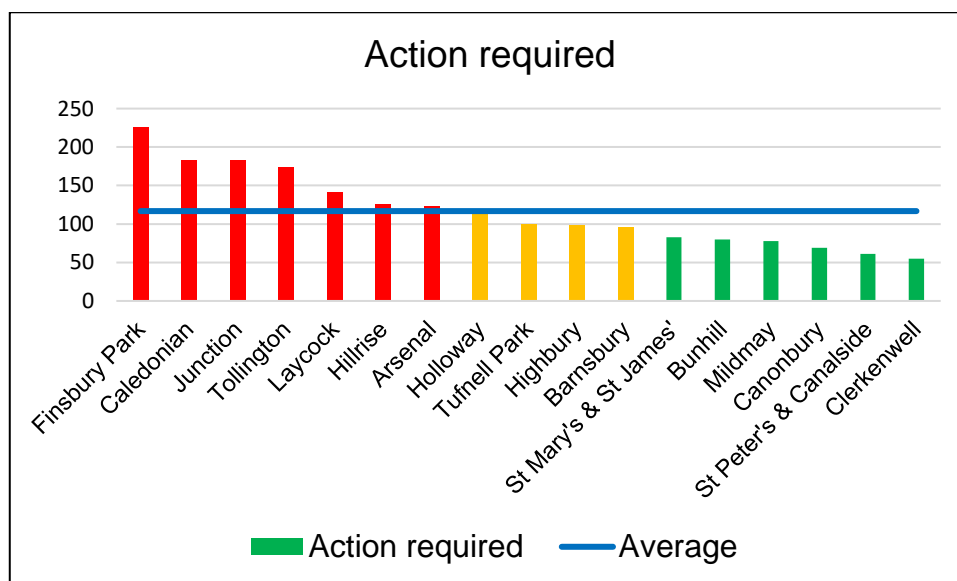


Figure 11. Number of property condition complaints requiring either formal or informal action to rectify an issue, per ward.

- E15. Figure 12 shows the number of cases resulting in formal action, such as the service of an Improvement Notice or prosecution per ward. The average number of cases resulting in formal action was 53 per ward (blue horizontal line).

E16. **Finsbury Park, Junction, Tollington, Caledonian, Laycock, Hillrise and Arsenal** (highlighted red) were at or above average for the number of cases.

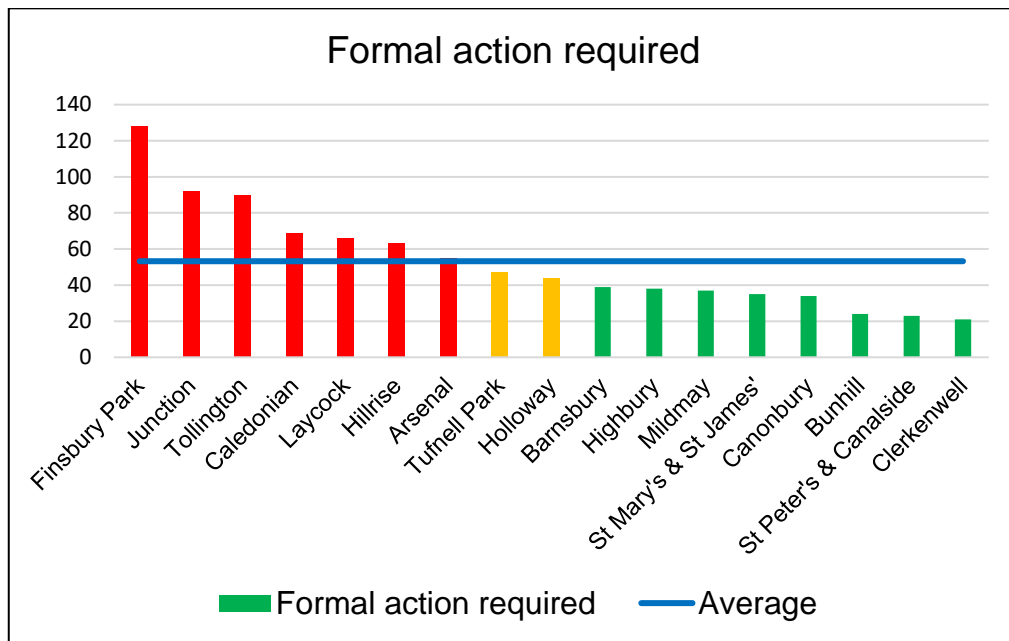


Figure 12. Cases of property condition complaints that led to formal action.

E17. Table 21 shows a summary of property condition data by ward. The wards that were at or above average for the different data sets analysed are highlighted in red. The wards that were consistently above average against all indicators, were **Finsbury Park, Caledonian, Junction, Tollington, Laycock, Arsenal and Hillrise.**

Table 21. Wards above average for data relating to property condition complaints.

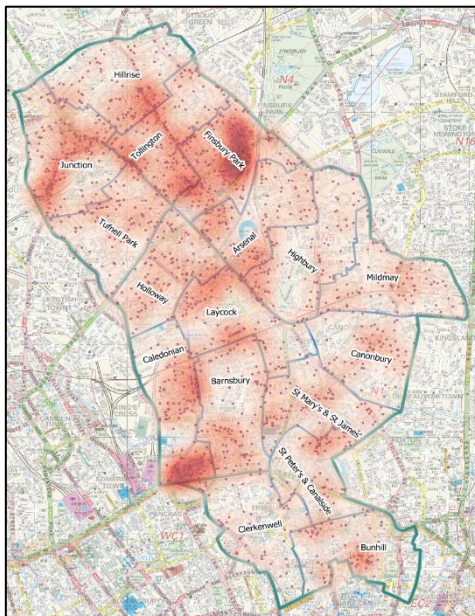
| Ward | Overall Number of complaints | Unique Number of complaints | Follow up action required | Formal enforcement action taken |
|-----------------------------------|------------------------------|-----------------------------|---------------------------|---------------------------------|
| AVERAGE | 140 | 117 | 116 | 53 |
| Finsbury Park | 268 | 229 | 225 | 128 |
| Caledonian | 222 | 184 | 183 | 69 |
| Junction | 220 | 181 | 183 | 92 |
| Tollington | 208 | 164 | 173 | 90 |
| Laycock | 162 | 130 | 141 | 66 |
| Arsenal | 149 | 122 | 123 | 55 |
| Hillrise | 144 | 123 | 125 | 63 |
| Holloway | 133 | 111 | 113 | 44 |
| Highbury | 120 | 102 | 98 | 38 |
| Tufnell Park | 120 | 99 | 100 | 47 |
| Barnsbury | 118 | 102 | 95 | 39 |
| St Mary's & St James' | 109 | 88 | 83 | 35 |
| Mildmay | 97 | 86 | 78 | 37 |
| Bunhill | 91 | 82 | 80 | 24 |
| Canonbury | 87 | 72 | 69 | 34 |
| St Peter's & Canalside | 82 | 74 | 61 | 23 |
| Clerkenwell | 60 | 56 | 55 | 21 |

- E18. An alternative method of looking at this data is to consider the number of unique addresses with property condition complaints as a percentage of the number of PRS properties in each ward (based upon the 2021 PRS analysis). Using this method, the average percentage is 5.63%. Table 22 shows six wards (highlighted red) that are above average. These wards are **Finsbury Park**, **Caledonian**, **Junction**, **Tollington**, **Laycock**, and **Hillrise**.

Table 22. Wards above average for the number of unique addresses with property condition complaints, as a percentage of the PRS and the total in Islington.

| Ward | PRS | Number of unique addresses with property condition complaints | Unique addresses with property condition complaints % of PRS | % Total of the unique addresses with property condition complaints in Islington |
|-----------------------------------|------|---|--|---|
| AVERAGE | | 117 | 5.6% | 5.9% |
| Finsbury Park | 2489 | 229 | 9.2% | 11.4% |
| Caledonian | 2669 | 184 | 6.9% | 9.2% |
| Junction | 1844 | 181 | 9.8% | 9.0% |
| Tollington | 2404 | 164 | 6.8% | 8.2% |
| Laycock | 1587 | 130 | 8.2% | 6.5% |
| Hillrise | 1617 | 123 | 7.6% | 6.1% |
| Arsenal | 2440 | 122 | 5.0% | 6.1% |
| Holloway | 2006 | 111 | 5.5% | 5.5% |
| Barnsbury | 2010 | 102 | 5.1% | 5.1% |
| Highbury | 2061 | 102 | 5.0% | 5.1% |
| Tufnell Park | 1814 | 99 | 5.4% | 4.9% |
| St Mary's & St James' | 2057 | 88 | 4.3% | 4.4% |
| Mildmay | 2135 | 86 | 4.0% | 4.3% |
| Bunhill | 2523 | 82 | 3.3% | 4.1% |
| St Peter's & Canalside | 2032 | 74 | 3.6% | 3.7% |
| Canonbury | 1695 | 72 | 4.3% | 3.6% |
| Clerkenwell | 2259 | 56 | 2.5% | 2.8% |

E19. The property condition complaints analysis shows that the seven wards of **Finsbury Park, Caledonian, Junction, Tollington, Laycock, Hillrise** and **Arsenal** are consistently above average, whilst the four wards of **Holloway, Barnsbury, Highbury** and **Tufnell Park** are consistently at least 75% of the average. Map 9 shows the distribution of unique property condition complaints over the period by new ward. The cases are shown as dots and the concentrations in orange shading.



Map 9 Distribution of unique property condition complaints 2014-2020 by new ward.

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Nuisance relating to poor condition of property

E20. Of the total **3,168** complaints about private rented properties mentioned above, **778** were about issues relating to nuisance issues such as pests, defective drainage, accumulations of rubbish etc. at **712** unique addresses.

626 (80%) cases required remedial action by the landlord, ranging from informal advice to formal action such as serving statutory notices or prosecution.

165 cases (21%) required formal enforcement action,

E21. Figure 13 below shows the numbers of total nuisance complaints per ward. The average number of nuisance complaints per ward was 45.

Finsbury Park, Tollington, Junction, Hillrise, Laycock, Caledonian, Holloway, and Arsenal (shaded red) being at or above average.

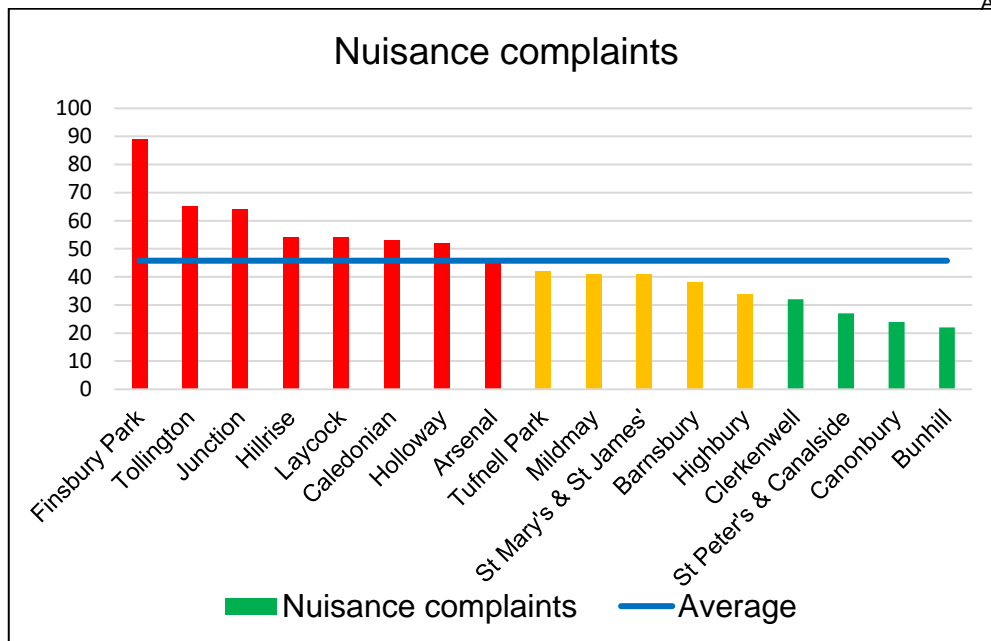


Figure 13. Total nuisance complaints per ward.

- E22. Analysis of the unique source addresses for nuisance complaints is shown in Figure 14. The average number of unique addresses was 40 per ward. **Finsbury Park, Tollington Junction, Laycock, Caledonian, Hillrise** and **Holloway** are at or above average (highlighted red).

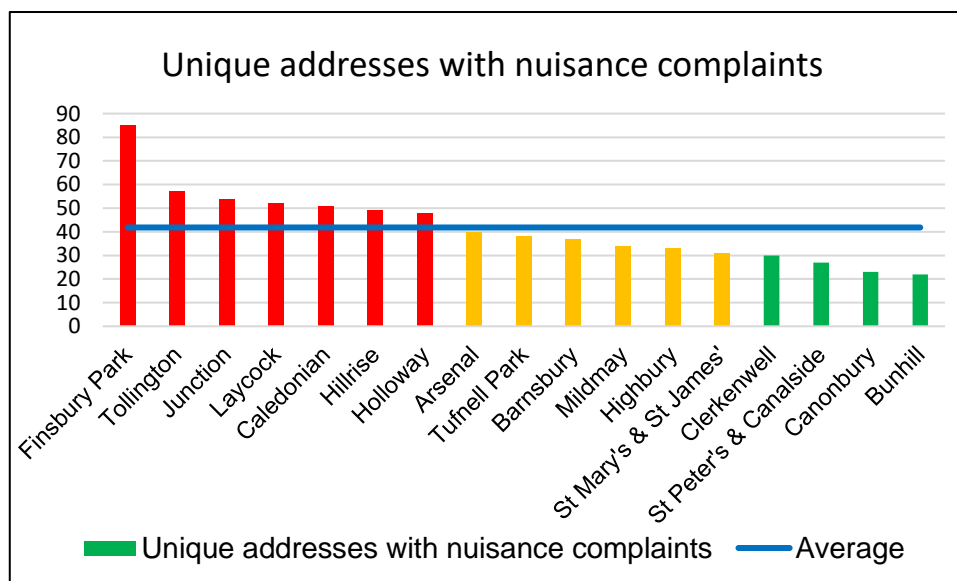


Figure 14. Unique addresses with property nuisance complaints by ward.

Pests

- E23. According to the latest British Pest Control Association (BCPA) Annual Survey⁵⁰, Islington had the 11th highest number of bed bug complaints per head of population in the country

⁵⁰ British Pest Control Association. National Survey 2016.

https://bpca.org.uk/write/MediaUploads/Documents/Research/BPCA_National_Survey_2016.pdf

with 0.88 per 1,000 people, compared to 0.49 for London and 0.2 nationally. Bed bugs are frequently associated with poor property conditions in the PRS.

- E24. For mice complaints, Islington was 7th highest nationally and second in London with 1,511 callouts, or 7.33 per 1,000 head of population, an increase of 32% on the previous year. For London, the average was 2.26 and nationally 1.21 per 1,000 people. Mice are also frequently associated with poorly managed PRS properties.
- E25. As previously mentioned, complaints about pest infestations in private rented accommodation was the second highest type of complaint received, with a total of 259 complaints solely about pests. Pest complaints are frequently combined with other more general complaints about properties and so the number of specific pest complaints may be under representative. Figure 15 shows the total number of pest complaints received over the period 2014-2020. **Finsbury Park, Caledonian, Hillrise, Junction, Holloway, Laycock** and **St Mary's & St. James'** are above average.

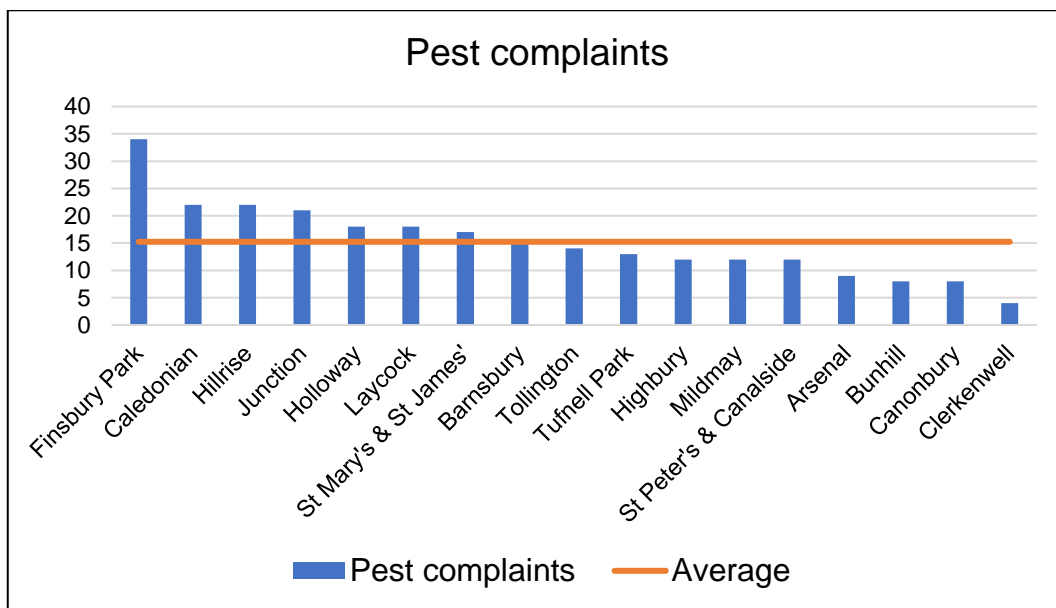


Figure 15. Number of pest complaints received relating to the PRS.

- E26. Looking in more detail at the complaints where landlord action was required, the total number of all nuisance complaint cases per ward is shown in Figure 16. Eight wards were above the average of 36 cases. **Finsbury Park, Junction, Laycock, Tollington, caledonian, Holloway, Hillrise** and **Arsenal** were above average (highlighted red).

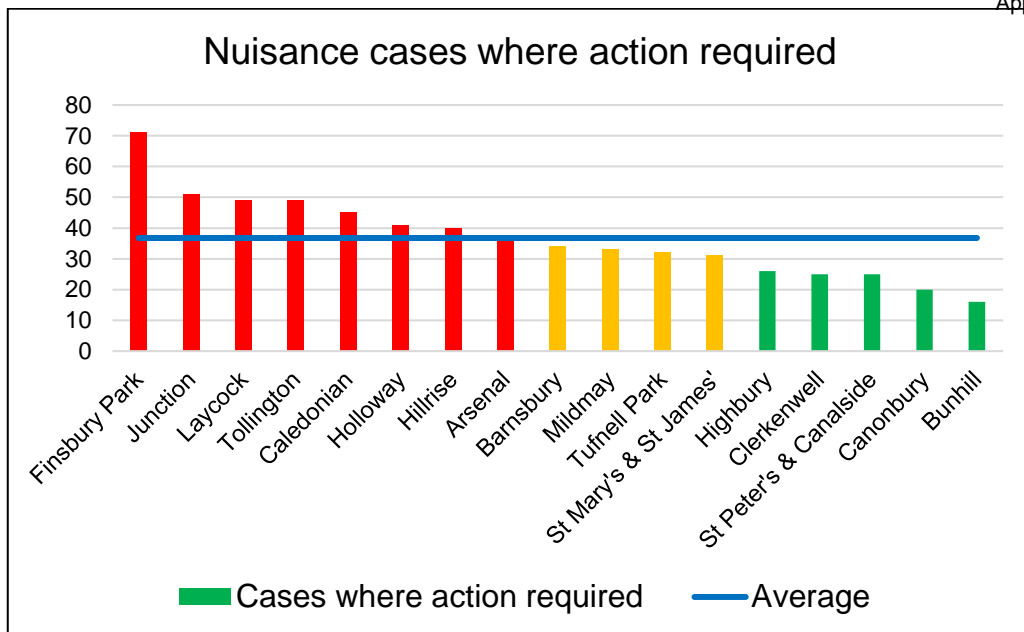


Figure 16. Number of property nuisance complaints per ward requiring formal or informal action to resolve the issue.

E27. Figure 17 shows the number of cases per ward that required formal enforcement action to remedy the nuisance.

E28. **Finsbury Park, Laycock, Hillrise, Tufnell Park, Caledonian, Barnsbury, Holloway and Mildmay** are above average (highlighted red).

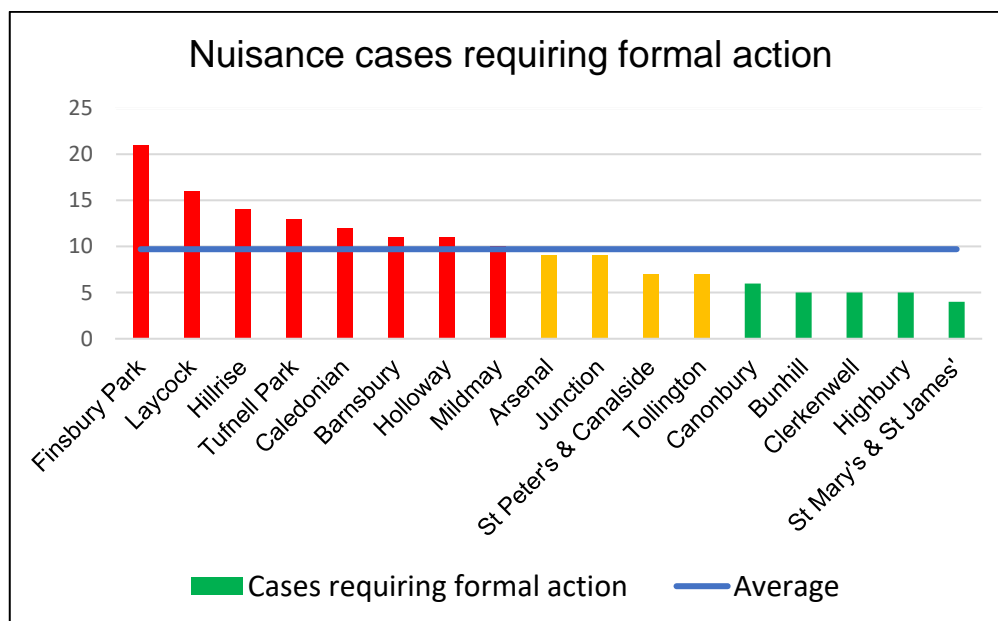


Figure 17. Cases of property nuisance complaints that led to formal action.

E29. Table 23 summarises the above datasets for nuisance by ward. **Finsbury Park, Tollington, Junction, Hillrise, Laycock, Caledonian, Holloway, Arsenal, Tufnell Park, Mildmay and Barnsbury** are all above average for the number of nuisance complaint cases where formal action was taken.

Table 23. Wards above average for data relating to nuisance complaints.

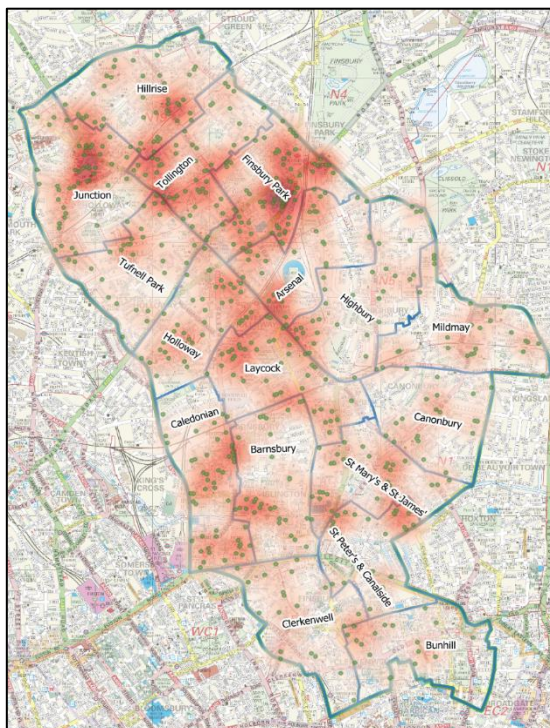
| Ward | Total Number of nuisance complaints | Number of unique addresses with nuisance complains | Number of nuisance complaint cases where action required | Number of nuisance complaint cases where formal action taken |
|-----------------------------------|-------------------------------------|--|--|--|
| AVERAGE | 45 | 41 | 36 | 9 |
| Finsbury Park | 89 | 85 | 71 | 21 |
| Tollington | 65 | 57 | 49 | 7 |
| Junction | 64 | 54 | 51 | 9 |
| Hillrise | 54 | 49 | 40 | 14 |
| Laycock | 54 | 52 | 49 | 16 |
| Caledonian | 53 | 51 | 45 | 12 |
| Holloway | 52 | 48 | 41 | 11 |
| Arsenal | 46 | 40 | 37 | 9 |
| Tufnell Park | 42 | 38 | 32 | 13 |
| Mildmay | 41 | 34 | 33 | 10 |
| St Mary's & St James' | 41 | 31 | 31 | 4 |
| Barnsbury | 38 | 37 | 34 | 11 |
| Highbury | 34 | 33 | 26 | 5 |
| Clerkenwell | 32 | 30 | 25 | 5 |
| St Peter's & Canalside | 27 | 27 | 25 | 7 |
| Cannonbury | 24 | 23 | 20 | 6 |
| Bunhill | 22 | 22 | 16 | 5 |

E30. Table 25 shows the number of unique addresses with nuisance complaints as a percentage of the number of PRS properties in each ward (based upon the 2021 PRS analysis). The average percentage is 2%. Seven wards (highlighted red) are above average, these were **Finsbury Park, Tollington, Junction, Laycock, Hillrise, Holloway** and **Tufnell Park**. A further six wards are at least 75% of the average (highlighted orange).

Table 24. Wards above average for the number of unique addresses with nuisance complaints as a percentage of the PRS and the total number of nuisance complaints in Islington.

| Ward | PRS | Number of unique addresses with nuisance complaints | Property nuisance complains – % of PRS | % unique addresses with nuisance complaints |
|------------------------|------|---|--|---|
| AVERAGE | | 41 | 2.0% | 5.9% |
| Finsbury Park | 2489 | 85 | 3.4% | 12.0% |
| Tollington | 2404 | 57 | 2.4% | 8.0% |
| Junction | 1844 | 54 | 2.9% | 7.6% |
| Laycock | 1587 | 52 | 3.3% | 7.3% |
| Caledonian | 2669 | 51 | 1.9% | 7.2% |
| Hillrise | 1617 | 49 | 3.0% | 6.9% |
| Holloway | 2006 | 48 | 2.4% | 6.8% |
| Arsenal | 2440 | 40 | 1.6% | 5.6% |
| Tufnell Park | 1814 | 38 | 2.1% | 5.3% |
| Barnsbury | 2010 | 37 | 1.8% | 5.2% |
| Mildmay | 2135 | 34 | 1.6% | 4.8% |
| Highbury | 2061 | 33 | 1.6% | 4.6% |
| St Mary's & St James' | 2057 | 31 | 1.5% | 4.4% |
| Clerkenwell | 2259 | 30 | 1.3% | 4.2% |
| St Peter's & Canalside | 2032 | 27 | 1.3% | 3.8% |
| Canonbury | 1695 | 23 | 1.4% | 3.2% |
| Bunhill | 2523 | 22 | 0.9% | 3.1% |

E31. The analysis of nuisance complaints demonstrates that eleven wards are consistently above average or at least 75% of the average for the measures. Map 10 shows the distribution of unique nuisance complaints over the period by new ward.



Map 10 Distribution of unique nuisance complaints by new ward.

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Poor property conditions - Category 1 and 2 hazards

- E32. Residential properties with one of 29 hazards are risk assessed using the housing health & safety rating system (HHSRS).⁵¹ A hazard is any risk of harm to the health or safety of an actual or potential occupier of a dwelling or HMO which arises from a deficiency.⁵² Under the Housing Act 2004, where local authorities consider it is appropriate to determine whether hazards exist on a premises, they are required to inspect the premises and assess the risk.⁵³ The risk assessment classifies each hazard as either category 1, or category 2 hazards. Category 1 hazards are more serious and require the council to take action to reduce or remove the risk.⁵⁴ Category 2 hazards are less serious, and the council has option to take action.⁵⁵
- E33. The results of 570 HHSRS assessments relating to SFO properties under the health and safety rating between 2014 to 2020 were analysed. The full data set for this period was unavailable due to a change in record keeping protocol during this period. Figure 18 shows the number of HHSRS inspections at unique addresses per ward, with the average being 31 per ward. **Finsbury Park, Caledonian, Tollington, Junction, Hillrise** and **Arsenal** are above average (highlighted red).

⁵¹ <https://www.gov.uk/government/publications/hhsrs-operating-guidance-housing-act-2004-guidance-about-inspections-and-assessment-of-hazards-given-under-section-9>

⁵²

Housing Act 2004. [Section 2](#)

⁵³ and Fol Risk

Housing Act 2004. [Section 4](#)

⁵⁴ Housing Act 2004. [Section 5](#)

⁵⁵ Housing Act 2004. [Section 7](#)

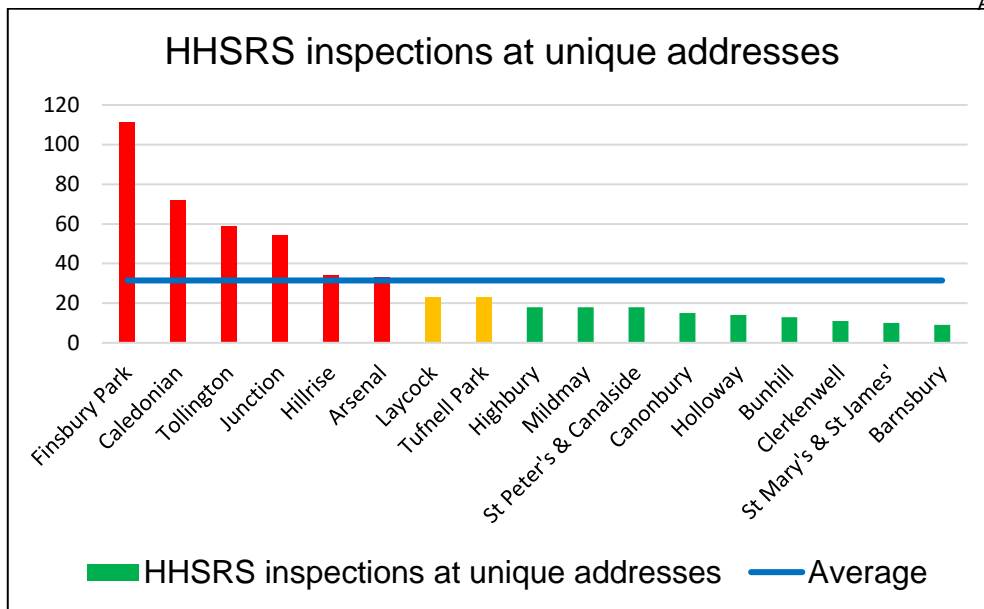


Figure 18. HHSRS inspections at unique addresses by ward 2014-2020.

E34. In total of **1,445** hazards were identified indicating that there was on average **2.5** hazards per property inspection. Figure 19 shows all category 1 and 2 hazards by ward. The average was 85 per ward. **Finsbury Park, Tollington, Caledonian, Junction, Hillrise and Arsenal** were above average (highlighted red).

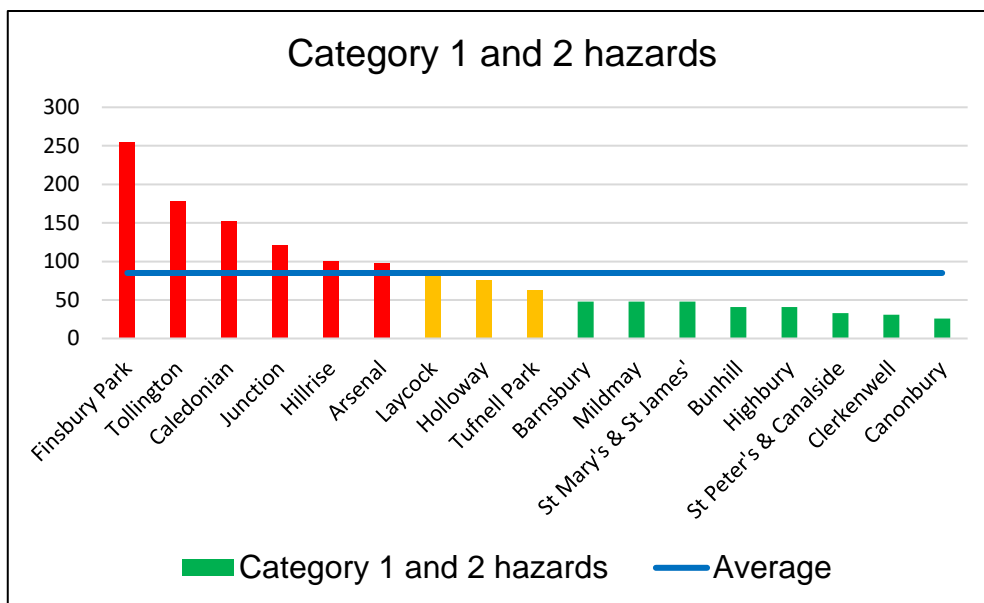
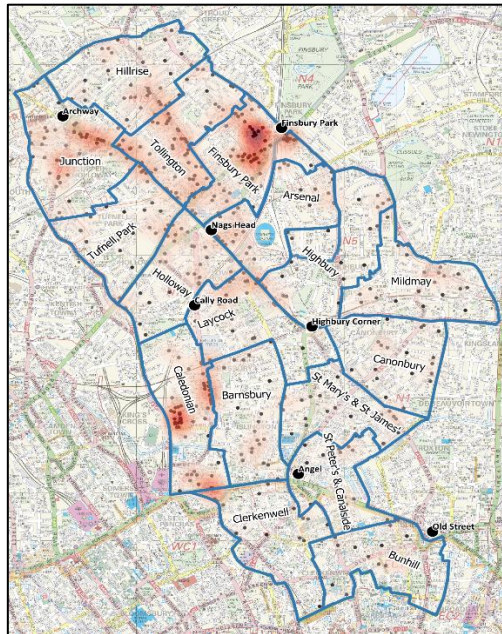


Figure 19. All hazards identified by ward.

E35. Map 11 shows the distribution of category 1 and category 2 hazards over the period by ward. The cases are shown by the black dots, with the red shading indicating the concentration of cases.



Map 11 Distribution of category 1 and 2 hazards by ward.

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E36. The most serious hazards requiring urgent attention are category 1 hazards. These present a serious risk to a person's health and safety. There were a total of **525** category 1 hazards found, with an average of 30.9 per ward. Figure 20 shows the distribution of category 1 hazards per ward. The same six wards (highlighted red) feature as having above average numbers.

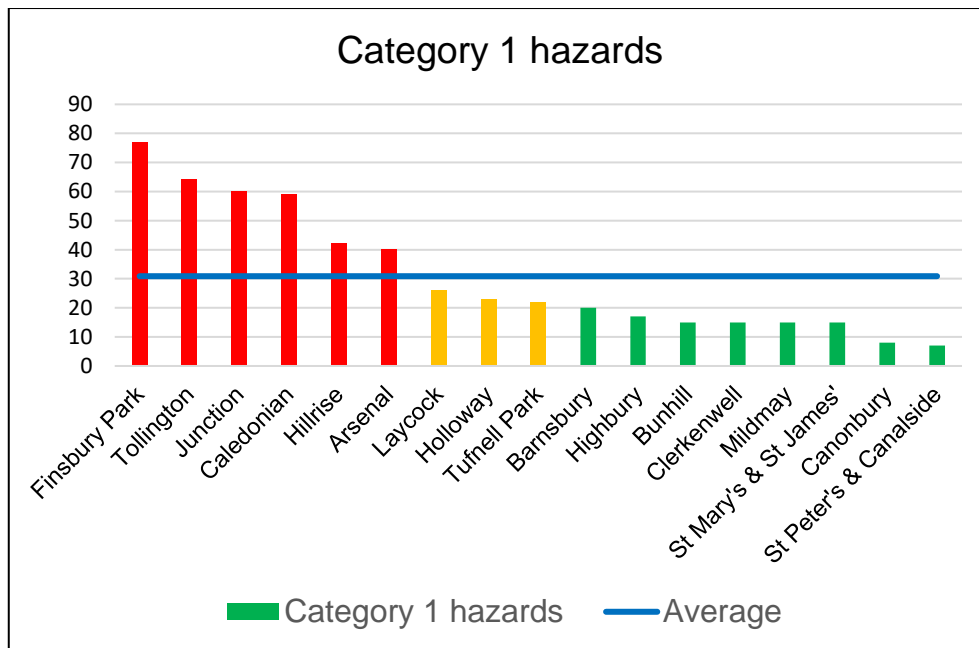


Figure 20. All category 1 hazards by ward.

E37. These hazards were found in a total of **223** different properties, an average of 13.1 per ward. Figure 21 shows the number of unique addresses with category 1 hazards. The same wards had the highest numbers as in the case of all category 1 hazards (highlighted red).

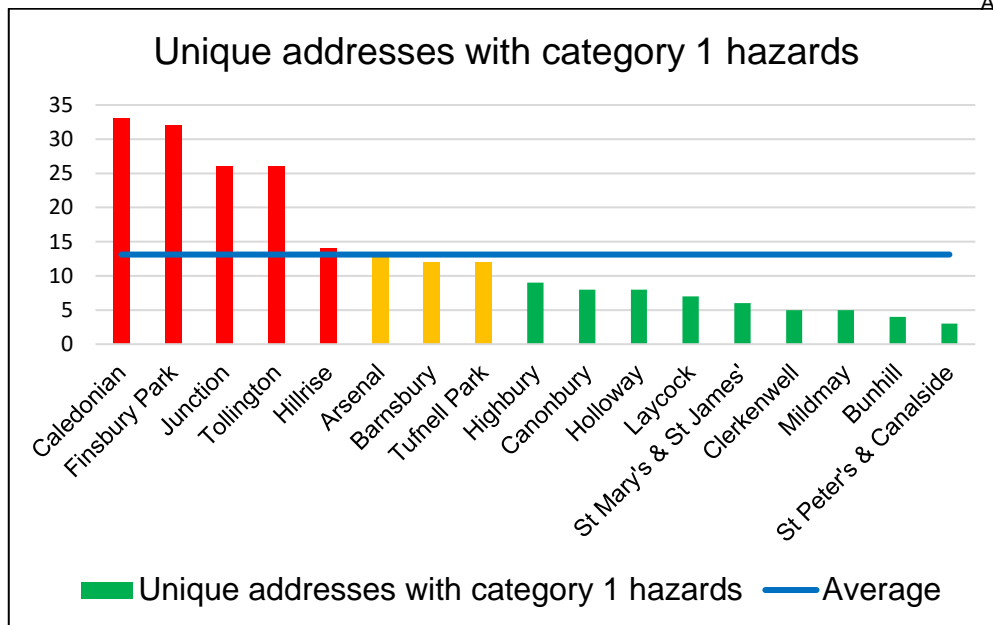


Figure 21. Unique addresses with category 1 hazards by ward.

E38. Table 25 shows the top category 1 hazard types found across all wards. By far the greatest number related to 'Fire' and 'Excess Cold.'

Table 25. Top category 1 hazard types.

| Hazard | Number of category 1 hazards |
|---------------------------|------------------------------|
| Fire | 144 |
| Excess Cold | 138 |
| Damp And Mould Growth | 53 |
| Falls On Stairs And Steps | 47 |
| Crowding And Space | 27 |
| Falls Between Levels | 17 |
| Personal Hygiene | 14 |
| Entry By Intruders | 13 |
| Falls On The Level | 13 |
| Lighting | 13 |
| Electrical Hazards | 12 |

E39. Category 2 hazards are those which require attention but are less serious and urgent than category 1 hazards. The highest two category 2 bands (D and E) were examined. **537** hazards were classified as high category 2. The average was 31.6 per ward. Figure 22 shows the numbers of band D and E category 2 hazards by ward. Seven wards were above average (highlighted red) and three wards had at least 75% of the average (highlighted orange).

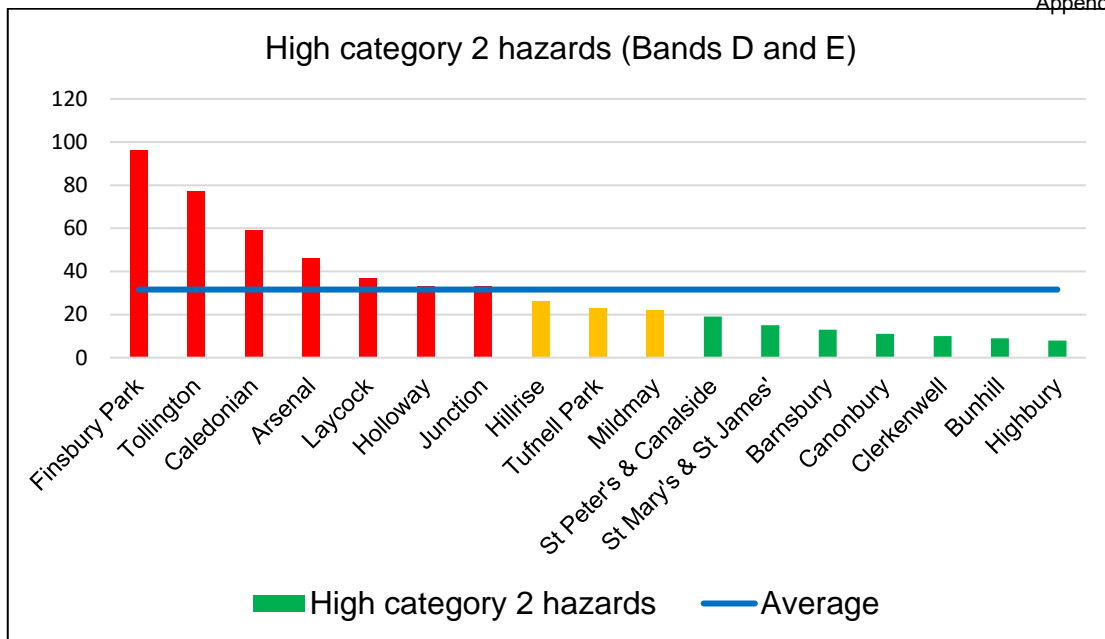


Figure 22. High category 2 hazards per ward.

- E40. Category 2 hazards were found in a total of **335** different properties, an average of 19.7 per ward. Figure 23 shows the number of unique addresses with high category 2 hazards. The same wards (all but Tufnell Park) were either above average or at least 75% of the average, as was the case for all high category 2 hazards.

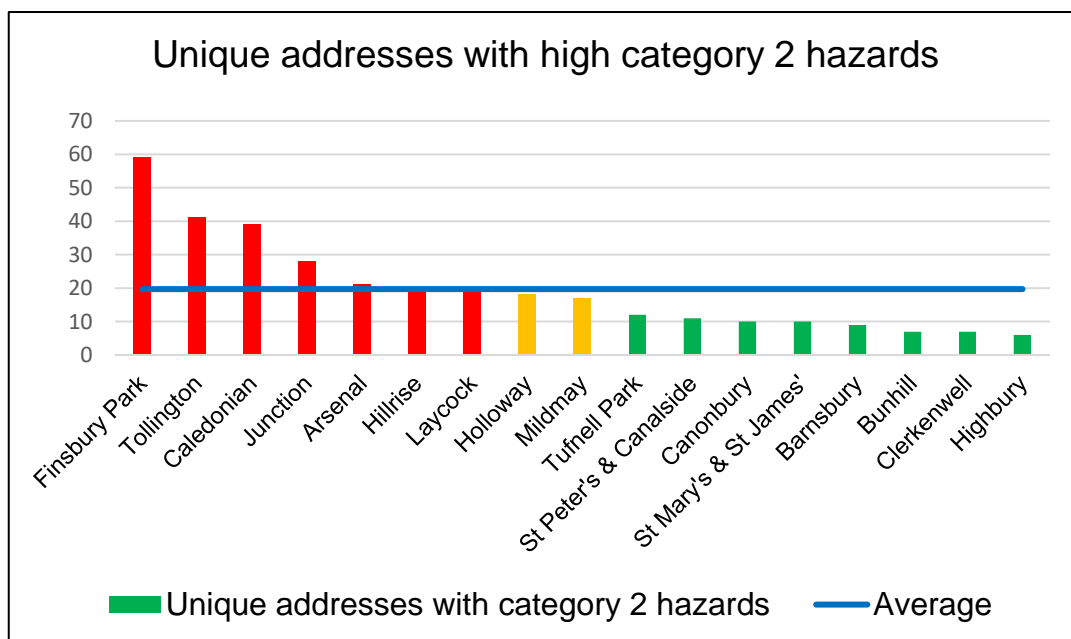


Figure 23. Unique addresses with high category 2 hazards.

- E41. Table 26 shows the top high category 2 hazard types found across all wards. By far the greatest number related to fire and damp and mould growth.

Table 26. Top high category 2 hazard types.

| Hazard | Number of high category 2 hazards |
|--------------------------|-----------------------------------|
| Fire | 121 |
| Damp and mould | 107 |
| Falls on stairs | 36 |
| Personal hygiene | 35 |
| Excess cold | 31 |
| Food safety | 30 |
| Electrical hazards | 27 |
| Entry by intruders | 27 |
| Falls on the level | 22 |
| Domestic hygiene & pests | 16 |

E42. Figure 24 shows the combined data sets for category 1 and 2 hazards.

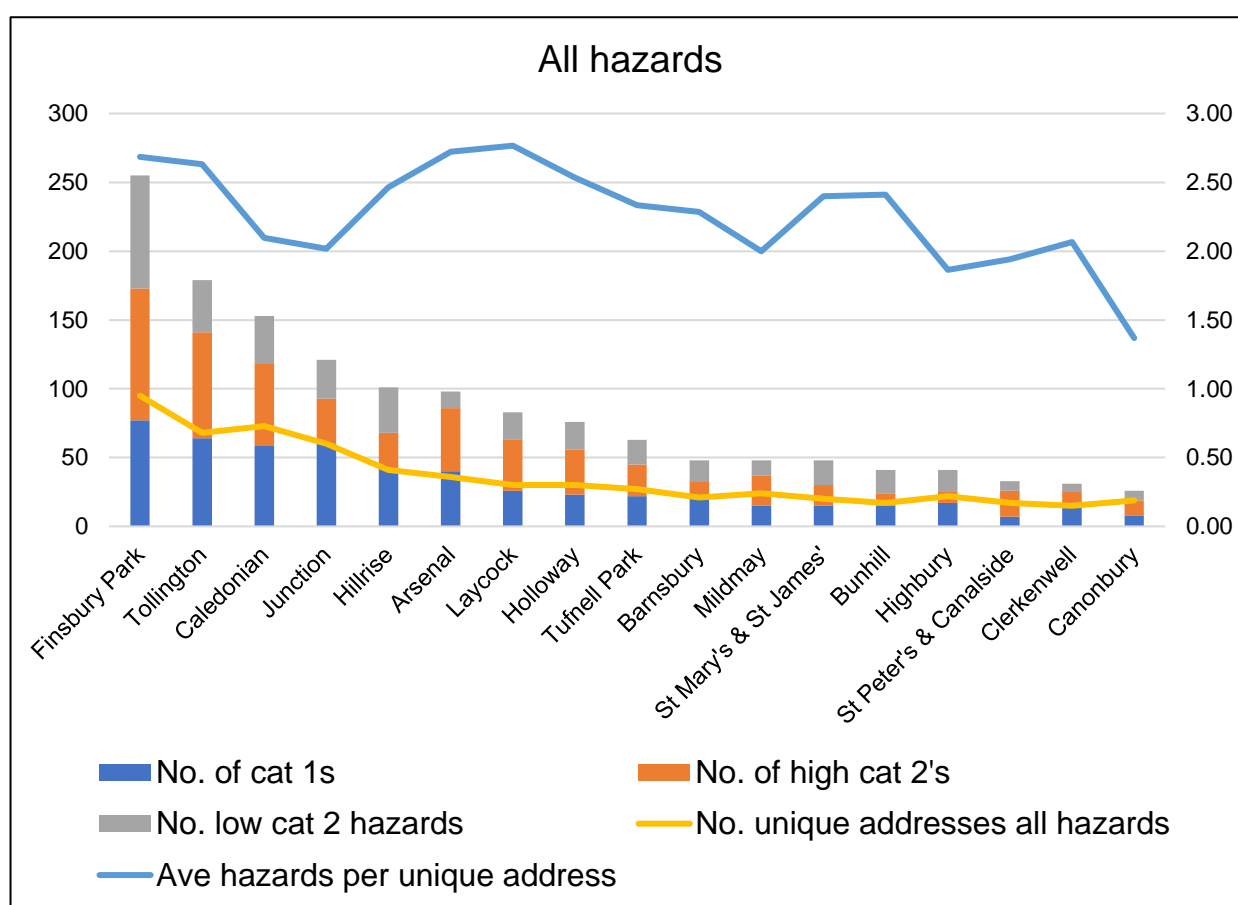


Figure 24. Total hazards per ward and average number of hazards per property.

E43. Table 27 shows numerical data on category 1 and 2 hazards. Finsbury Park, Tollington, Caledonian, Junction, Hillrise, Arsenal are above average and shaded in red, Laycock Holloway and Tufnell Park are slightly below average and shaded in orange

Table 27. Summary of wards above average for hazard criteria indicating poor property conditions.

| Ward | Total number of hazards | Number of unique addresses with hazards | Number of category 1 hazards | Number of high category 2 hazards | Number of Low category 2 hazards |
|-----------------------------------|-------------------------|---|------------------------------|-----------------------------------|----------------------------------|
| AVERAGE | 85 | 36 | 30 | 31 | 24 |
| Finsbury Park | 255 | 95 | 77 | 96 | 82 |
| Tollington | 179 | 68 | 64 | 77 | 38 |
| Caledonian | 153 | 73 | 59 | 59 | 35 |
| Junction | 121 | 60 | 60 | 33 | 28 |
| Hillrise | 101 | 41 | 42 | 26 | 33 |
| Arsenal | 98 | 36 | 40 | 46 | 12 |
| Laycock | 83 | 30 | 26 | 37 | 20 |
| Holloway | 76 | 30 | 23 | 33 | 20 |
| Tufnell Park | 63 | 27 | 22 | 23 | 18 |
| Barnsbury | 48 | 21 | 20 | 13 | 15 |
| Mildmay | 48 | 24 | 15 | 22 | 11 |
| St Mary's & St James' | 48 | 20 | 15 | 15 | 18 |
| Bunhill | 41 | 17 | 15 | 9 | 17 |
| Highbury | 41 | 22 | 17 | 8 | 16 |
| St Peter's & Canalside | 33 | 17 | 7 | 19 | 7 |
| Clerkenwell | 31 | 15 | 15 | 10 | 6 |
| Canonbury | 26 | 19 | 8 | 11 | 7 |

Enforcement actions – statutory notices

- E44. This section analyses data on cases where there was an issue that required formal enforcement action to deal with conditions at the property, such as notices served under the Housing Act 2004, Public Health Act 1936, or Environmental Protection Act 1990.
- E45. There were **898** notices served between 2014 and 2020. Figure 25 shows the distribution of these notices by ward. The average was 52 notices per ward, with **Finsbury Park, Junction, Tollington, Tufnell Park, Caledonian, Hillrise, Arsenal, Holloway and Laycock** above average (highlighted red).

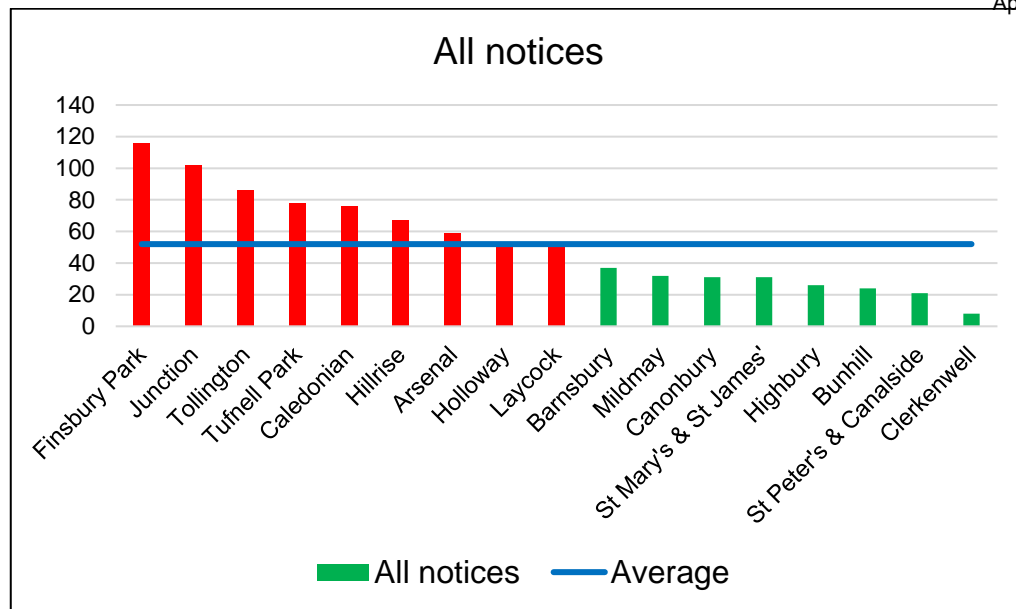


Figure 25. All notices served by ward.

- E46. Of the 895 notices served, these related to **684** unique addresses, meaning there was an average of **1.3** notices served per property. The average number of unique properties with notices per ward is 40. In Figure 26, eight wards were above average (highlighted red).

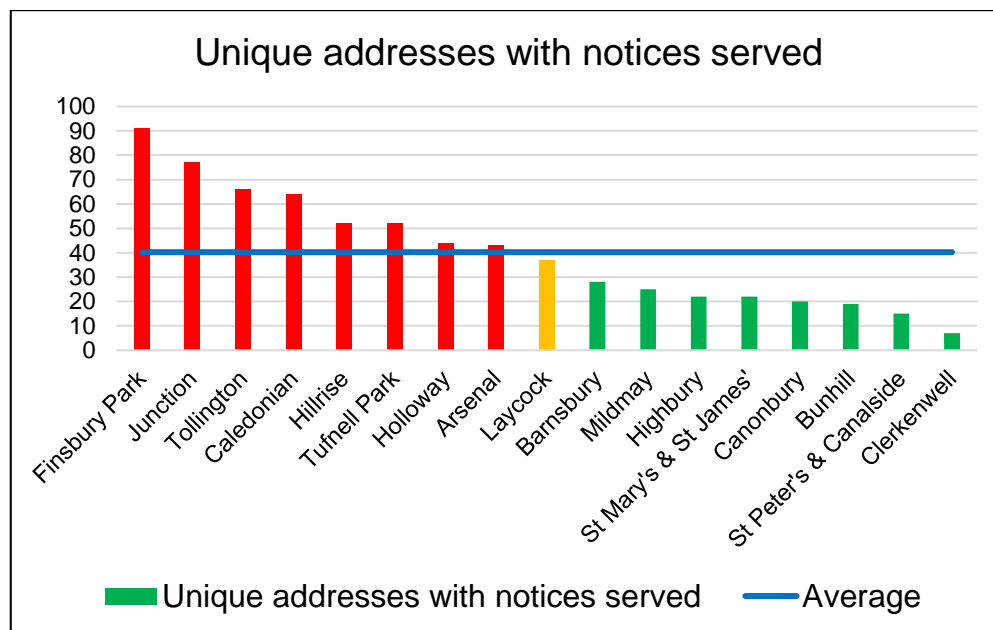
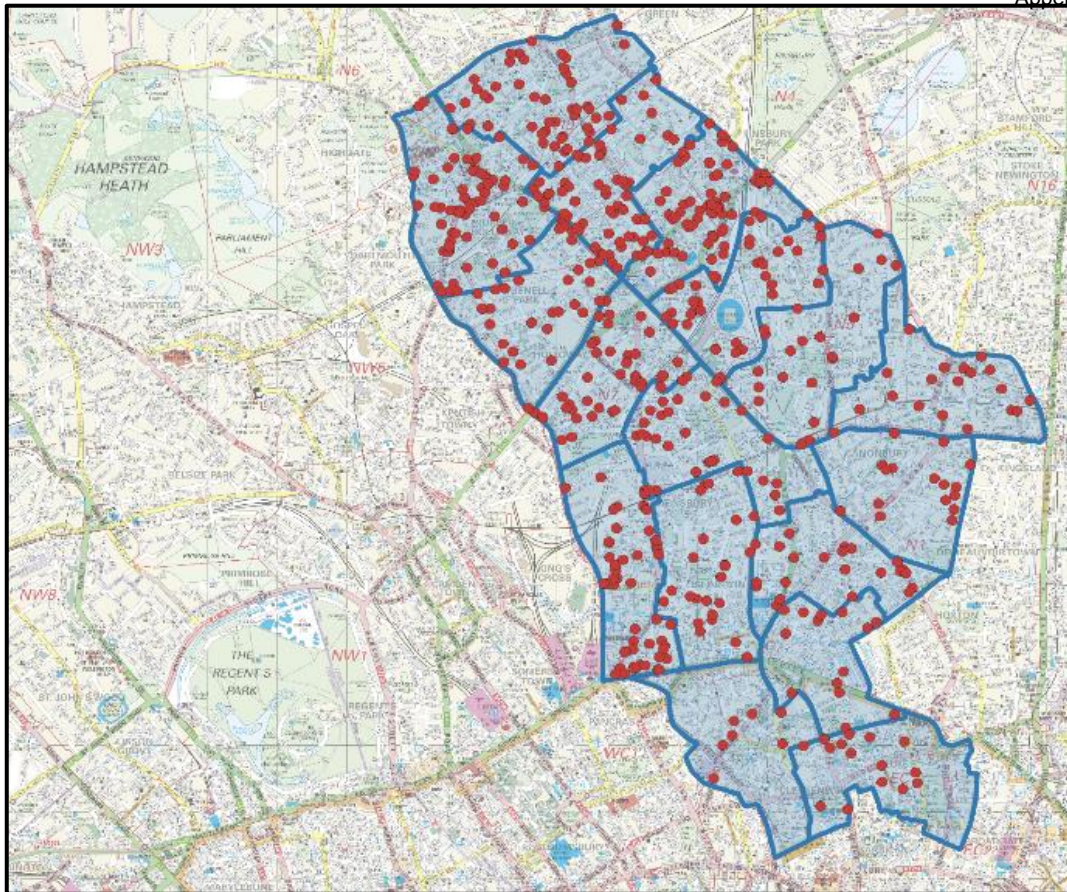


Figure 26. Unique addresses with notices served per ward.

- E47. Map 12 shows the distribution of the properties subject to all notices on the new ward boundaries.



Map 12 Distribution of all notices on new ward boundaries.

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E48. Housing Act notices deal directly with issues such as removing or reducing category 1 and 2 hazards and overcrowding. Looking solely at Housing Act notices served, there were **502** in total. Table 28 shows the numbers of each category of major notice type.

Table 28. Major Housing Act notices served by type.

| Notice type | Number served |
|----------------------------------|---------------|
| Improvement Notice | 272 |
| Hazard Awareness Notice | 119 |
| Overcrowding Notice | 41 |
| Prohibition Order | 28 |
| Suspended Prohibition Order | 25 |
| Suspended Improvement Notice | 13 |
| Emergency Prohibition Order | 2 |
| Emergency Remedial Action Notice | 1 |
| Closing Order | 1 |

E49. Figure 27 shows the Housing Act notices by ward. The average is 29, with Finsbury Park, Junction, Tollington, Caledonian, Tufnell Park and Hillrise all above average (highlighted red). Arsenal, Holloway and Laycock are at least 75% of the average (highlighted orange).

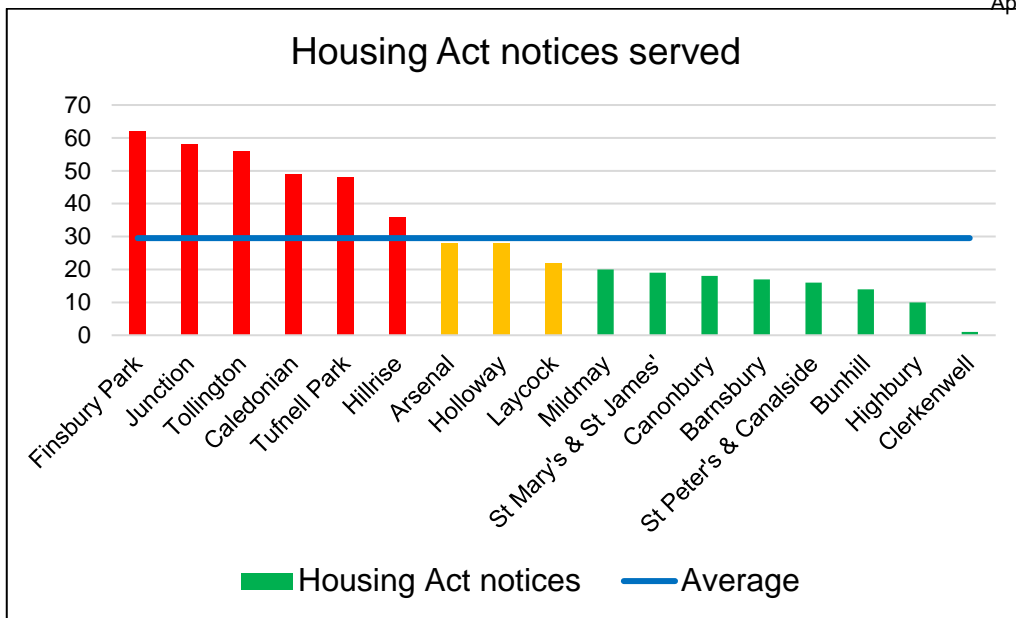


Figure 27. Housing Act notices per ward.

E50. Figure 32 shows the ward distribution of the **424** unique addresses where Housing Act notices were served

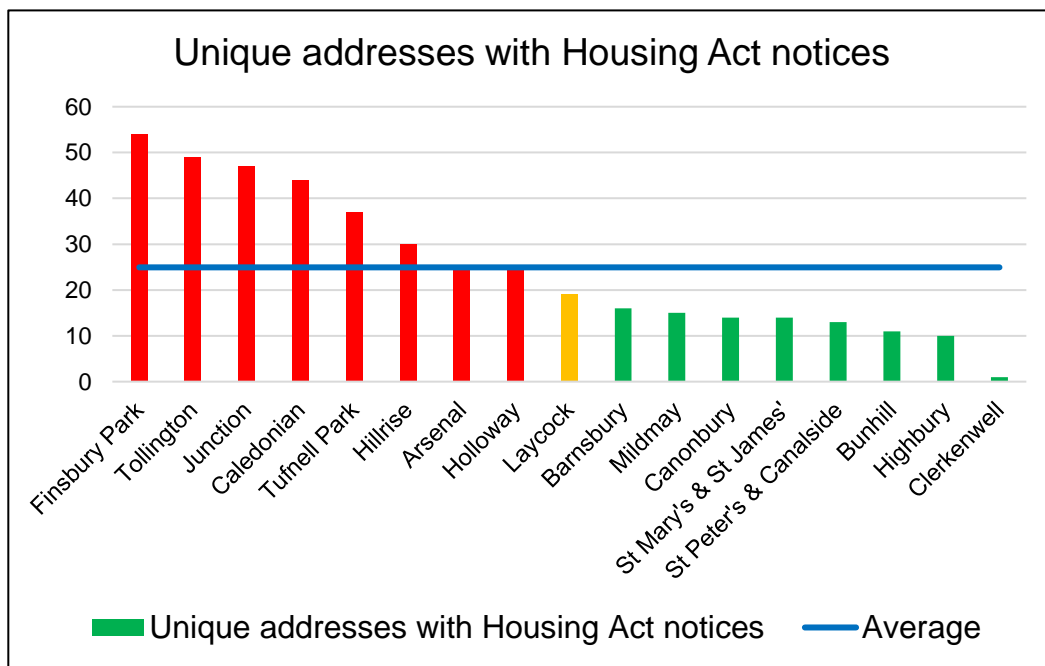
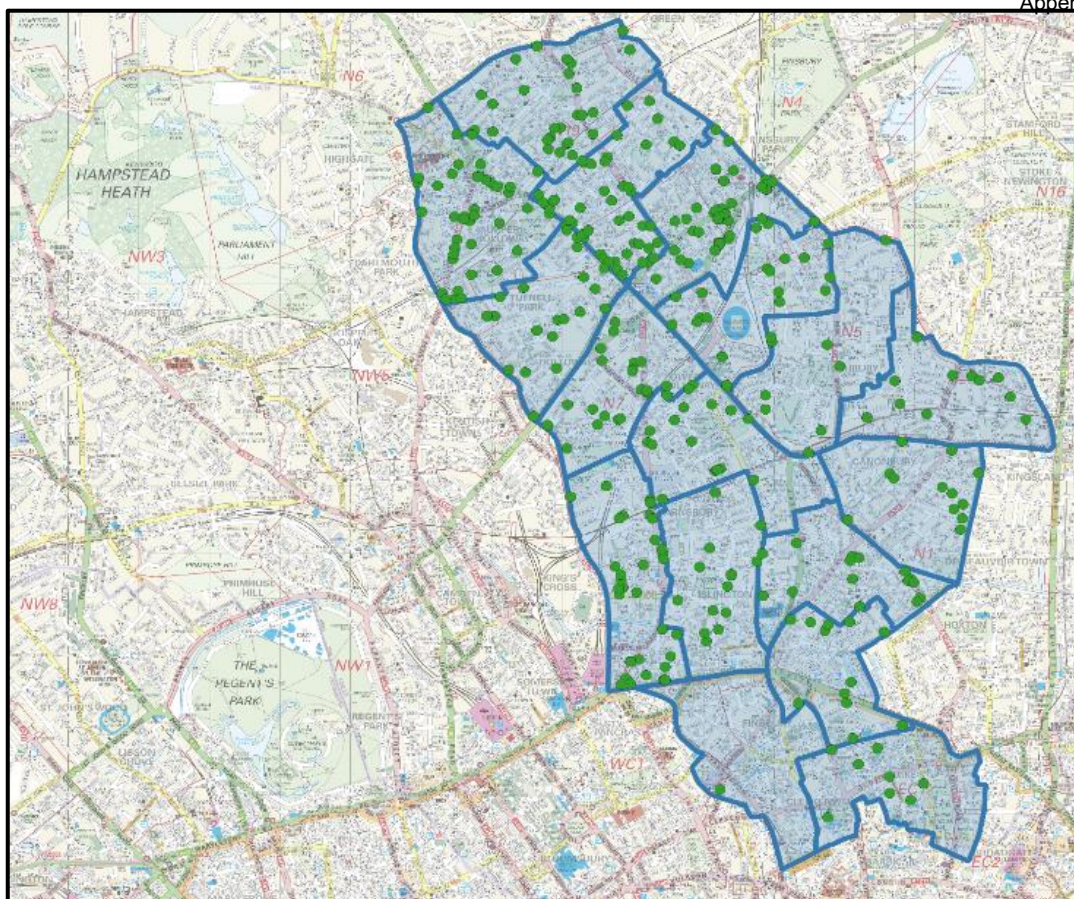


Figure 28. Unique addresses with Housing Act notices by ward.

E51. Map 13 below shows the distribution of the properties subject to Housing Act notices.



Map 13 Distribution of Housing Act notices on new ward boundaries.

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E52. Some inspections identify poor conditions that can be remedied under other legislation, such as the Building Act 1984, Environmental Protection Act 1990, and the Public Health Act 1936. There were **393** notices meeting this description that required the landlord undertake remedial action to improve conditions in the property. Table 29 shows the top 5 categories of these types of notices.

Table 29. Top categories of miscellaneous notices served relating to property conditions.

| Notice type | Number served |
|---------------------------------------|---------------|
| Environmental Protection Act | 153 |
| Prevention of Damage by Pests Act | 114 |
| Building Act 1984 | 42 |
| Public Health Act 1936 | 30 |
| Community Protection Act Final Notice | 26 |

E53. Figure 29 shows the number of miscellaneous notices per ward, with an average of 23. Nine wards were at or above average (highlighted red).

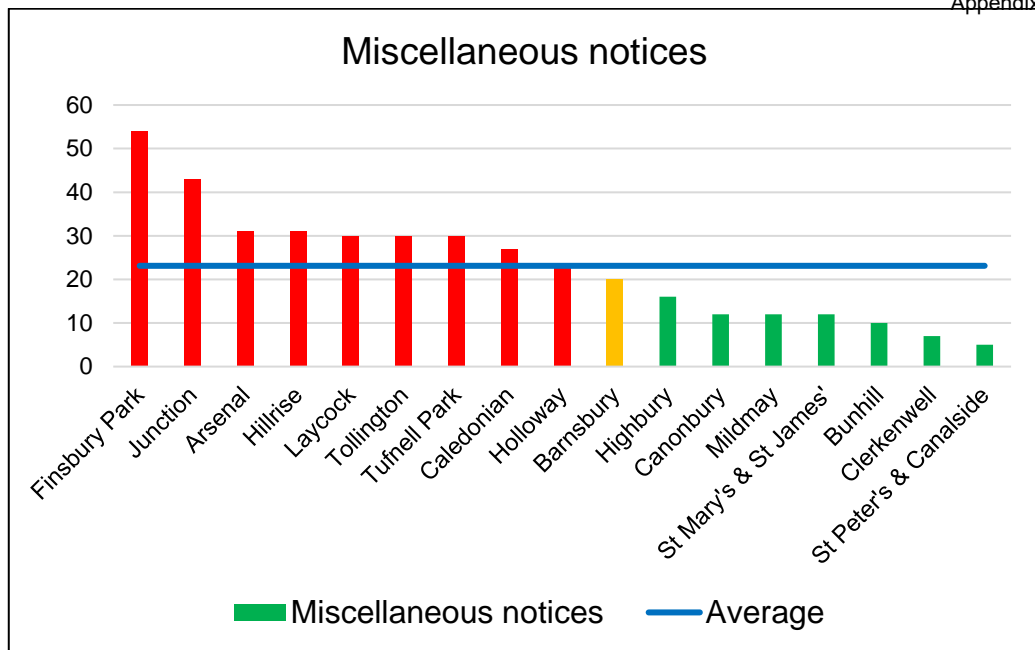
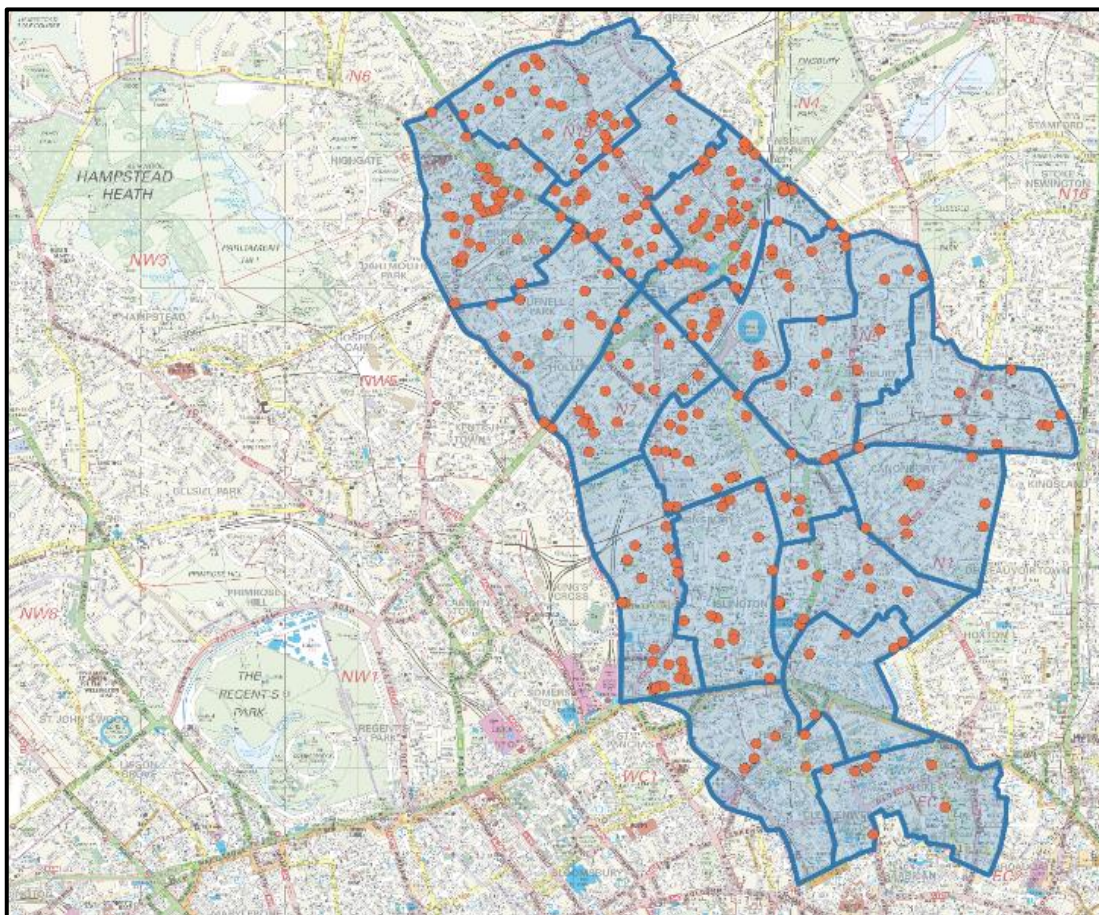


Figure 29. Total of miscellaneous notices related to property conditions per ward.

E54. Map 14 below shows the distribution of the properties subject to miscellaneous notices on the new ward boundaries.



Map 14 Distribution of miscellaneous notices on new ward boundaries.

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E55. Table 30 provides a summary of all Notices served by ward. **Finsbury Park, Junction, Tollington, Tufnell Park, Caledonian, Hillrise, Arsenal, Holloway** and **Laycock** are consistently above average for all notice indicators.

Table 30. Summary of wards above average for enforcement notices.

| Ward | Total number of notices served | Number of unique addresses with notices served | Number of Housing Act notices | Number of unique addresses with Housing Act notices | Number of miscellaneous notices |
|-----------------------------------|--------------------------------|--|-------------------------------|---|---------------------------------|
| AVERAGE | 52 | 40 | 29 | 25 | 23 |
| Finsbury Park | 116 | 91 | 62 | 54 | 54 |
| Junction | 102 | 77 | 58 | 47 | 43 |
| Tollington | 86 | 66 | 56 | 49 | 30 |
| Tufnell Park | 78 | 52 | 48 | 37 | 30 |
| Caledonian | 76 | 64 | 49 | 44 | 27 |
| Hillrise | 67 | 52 | 36 | 30 | 31 |
| Arsenal | 59 | 43 | 28 | 25 | 31 |
| Holloway | 52 | 44 | 28 | 25 | 23 |
| Laycock | 52 | 37 | 22 | 19 | 30 |
| Barnsbury | 37 | 28 | 17 | 16 | 20 |
| Mildmay | 32 | 25 | 20 | 15 | 12 |
| Canonbury | 31 | 20 | 18 | 14 | 12 |
| St Mary's & St James' | 31 | 22 | 19 | 14 | 12 |
| Highbury | 26 | 22 | 10 | 10 | 16 |
| Bunhill | 24 | 19 | 14 | 11 | 10 |
| St Peter's & Canalside | 21 | 15 | 16 | 13 | 5 |
| Clerkenwell | 8 | 7 | 1 | 1 | 7 |

Finsbury Park ward property survey

E56. In 2018 the council conducted a sample survey of 314 properties in Finsbury Park. Of the 114 properties occupied by single family households 54% of these properties were found to have conditions of concern.

Table 31 shows the findings of the survey

Table 31. Issues found in SFOs in Finsbury Park Survey.

| Issue | Number of properties identified | Percentage of SFO properties with issues |
|---|---------------------------------|--|
| External condition issues | 27 | 24% |
| Internal condition issues | 31 | 27% |
| Inadequate amenities | 0 | 0% |
| Overcrowding | 4 | 4% |
| Property management issues | 27 | 24% |
| Lock of gas safety certificate | 23 | 20% |
| No fire alarms | 10 | 9% |
| Occupier does not feel safe from intruders | 4 | 4% |
| No written tenancy agreement | 1 | 1% |
| Property converted without building regulation compliance | 14 | 12% |
| Any issues | 62 | 54% |
| Total number of SFOs identified | 114 | 100% |

Property Conditions Conclusions

- E57. All available data on property conditions in the private rented sector has been considered in this section. Most of this data is based on complaints and referrals from tenants however not all tenants will feel confident about complaining about their living conditions, some will be afraid of repercussions if they complain, such as retaliatory eviction, harassment or increased rents and other may know how to complain. The only exception is a small survey conducted in Finsbury Park which indicated that 54% tenants survey reported poor property conditions of concern.
- E58. The data indicates that poor property conditions can manifest in any part of the borough, but these are the wards that consistently rank above average the various dataset analysed:
- Finsbury Park
 - Junction
 - Tollington
 - Caledonian
 - Hillrise
 - Laycock
 - Tufnell Park
 - Arsenal
 - Holloway
- E59. Overall poor property conditions in the private rented sector tend to be concentrated in the north and west of the borough. The existing and proposed wards Finsbury Park contain some of the worst privately rented accommodation and poor property data supports extending the area of the borough covered by selective licensing to the adjoining new wards of Tollington and Hillrise in the first instance. Further consideration should be given to extending selective licensing to the six other wards at the earliest opportunity.

8.6 PART F: Anti-Social Behaviour

- F1. To show that anti-social behaviour is a relevant criterion for the designation of a selective licensing scheme, it must be demonstrated that the area is experiencing a significant and persistent problem caused by anti-social behaviour (ASB).⁵⁶
- F2. Guidance⁵⁷ suggests the authority should consider whether private sector landlords in the designated area are not effectively managing their properties to combat incidences of anti-social behaviour caused by their tenants, or people visiting their properties and in particular the area suffers from anti-social behaviour because of this failure, or because that failure significantly contributes to that problem.
- F3. For these purposes, the guidance suggests ASB can include:
- intimidation and harassment of tenants or neighbours
 - noise, rowdy and nuisance behaviour affecting persons living in or visiting the vicinity
 - animal related problems
 - vehicle related nuisance
 - anti-social drinking or prostitution
 - illegal drug taking or dealing
 - graffiti and fly posting
 - litter and waste within the curtilage of the property.
- F4. Data has been gathered from both the police and the council's database of ASB complaints.
- F5. The police provided data on begging and vagrancy, fireworks, noise, rowdy/nuisance neighbours, rowdy or inconsiderate behaviour, vehicle nuisance, inappropriate use or inconsiderate behaviour, drugs and other ASB.
- The numbers of ASB calls to the police was available for
- 1st January 2019 to 31st December 2019
 - 1st January 2020 to 31st December 2020
- F6. The top 6 wards for police ASB reports were Finsbury Park, Junction, Tollington, Laycock Clerkenwell and Caledonian. The increase in ASB calls to the police is thought to have been triggered by Covid 19 lockdown. Table 32 shows the data by ward.

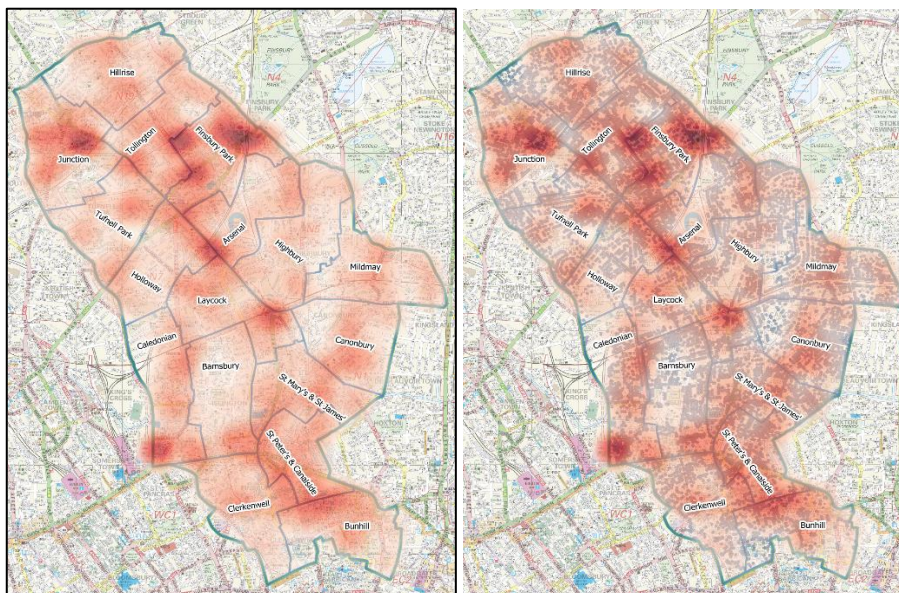
⁵⁶ Housing Act 2004, [Section 80\(6\)](#)

⁵⁷ Department for Communities and Local Government. Selective licensing in the private rented sector A Guide for local authorities

Table 32. Numbers of ASB calls to the police by ward.

| Ward | Total ASB calls to Police in 2019 | Total ASB calls to Police in 2020 | Percentage Increase | Total cases |
|------------------------|-----------------------------------|-----------------------------------|---------------------|---------------|
| Finsbury Park | 659 | 1,214 | 84% | 1,873 |
| Junction | 530 | 992 | 87% | 1,522 |
| Tollington | 542 | 901 | 66% | 1,443 |
| Laycock | 524 | 911 | 74% | 1,435 |
| Clerkenwell | 510 | 812 | 59% | 1,322 |
| Caledonian | 518 | 774 | 49% | 1,292 |
| Bunhill | 469 | 742 | 58% | 1,211 |
| St Peter's & Canalside | 435 | 751 | 73% | 1,186 |
| St Mary's & St James' | 455 | 704 | 55% | 1,159 |
| Holloway | 429 | 660 | 54% | 1,089 |
| Hillrise | 317 | 741 | 134% | 1,058 |
| Arsenal | 323 | 673 | 108% | 996 |
| Mildmay | 311 | 665 | 114% | 976 |
| Highbury | 342 | 617 | 80% | 959 |
| Tufnell Park | 281 | 604 | 115% | 885 |
| Barnsbury | 335 | 519 | 55% | 854 |
| Canonbury | 246 | 603 | 145% | 849 |
| TOTAL | 7,226 | 12,883 | 78% | 20,109 |

- F7. Map 15 shows the distribution of the police ASB calls. The left-hand map shows the cases as a heat map and the right-hand map shows the heat map overlaid on the dot map of PRS properties.



Map 15 Police ASB cases 2019-2020.

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- F8. Table 33 shows the types of complaint reported to the police in 2019 and 2020. The highest category was rowdy or inconsiderate behaviour and 9.9% of these complaints were in **Finsbury Park** ward. **Finsbury Park** had the highest number of complaints in the categories of begging / vagrancy, fireworks, rowdy or inconsiderate behaviour, drugs and other ASB. **Tollington** ward had the highest numbers of noise and rowdy / nuisance neighbours. **Canonbury** and **Hillrise** jointly had the highest numbers of vehicle nuisance / inappropriate use.

Table 33. ASB complaints to the police - complaint types.

| Category | Total police ASB complaints 2019 & 2020 |
|--------------------------------------|---|
| Begging / vagrancy | 965 |
| Fireworks | 262 |
| Noise | 1,948 |
| Rowdy / nuisance neighbours | 2,604 |
| Rowdy or inconsiderate behaviour | 7,712 |
| Vehicle nuisance / inappropriate use | 380 |
| Drugs | 3,077 |
| Other ASB | 3,161 |
| TOTAL | 20,109 |

- F9. Figure 30 shows the trend of ASB calls to the police between 2015 and 2021. The levels have been consistent, with a peak around the time of the first COVID-19 lockdown in the spring of 2020.

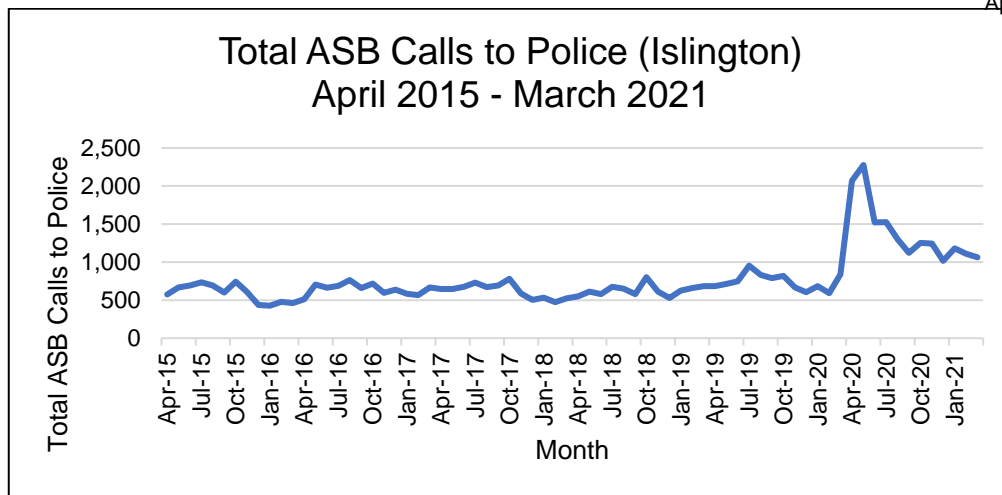


Figure 30. ASB calls to police long-term trend.

F10. The council also receives complaints about anti-social behaviour and data was available on animal problems, drugs, environmental, neighbours, noise, rowdy/inconsiderate behaviour, anti-social street drinking, vehicle nuisance or inappropriate use, and other ASB.

The numbers of ASB calls to the council was available for

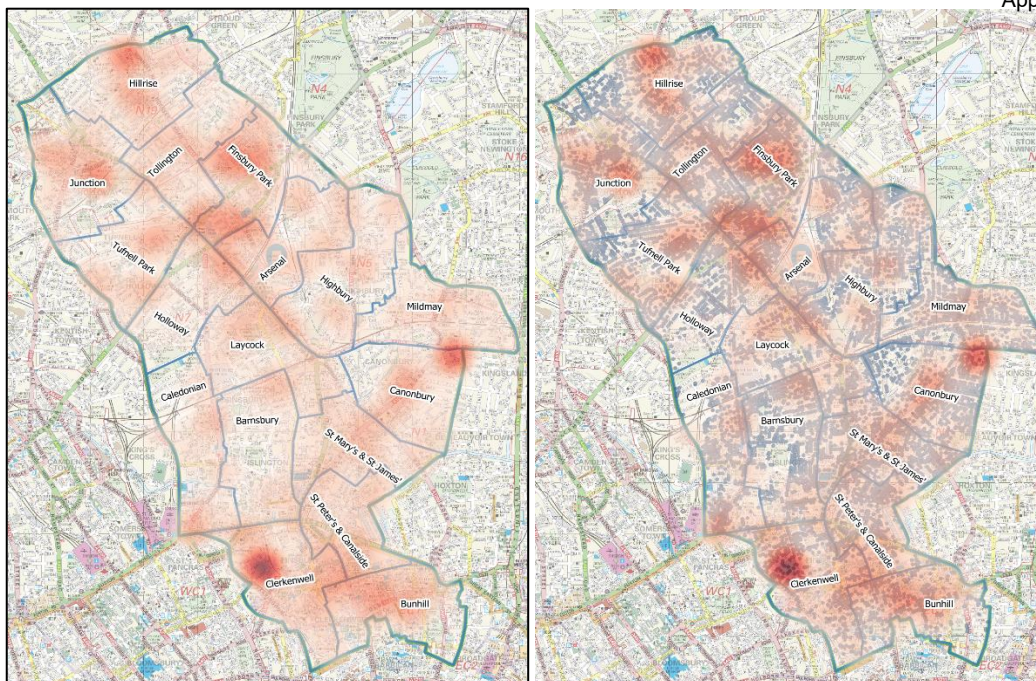
- 1st January 2019 to 31st December 2019
- 1st January 2020 to 31st December 2020

The top 6 wards ASB complaints to the council were Clerkenwell, Finsbury Park, Bunhill, Hillrise Junction and Canonbury. The increase in ASB calls to council is thought to have been triggered by Covid 19 lockdown Table 40 shows the data by ward.

Table 34. Number of ASB calls to the council by ward.

| Ward | Total ASB calls to the council in 2019 | Total ASB calls to the council in 2020 | Percentage increase | Total cases |
|------------------------|--|--|---------------------|---------------|
| Clerkenwell | 1,552 | 2,258 | 45% | 3,810 |
| Finsbury Park | 1,284 | 2,414 | 88% | 3,698 |
| Bunhill | 1,394 | 1,521 | 9% | 2,915 |
| Hillrise | 956 | 1,920 | 101% | 2,876 |
| Junction | 915 | 1,841 | 101% | 2,756 |
| Canonbury | 877 | 1,827 | 108% | 2,704 |
| Arsenal | 936 | 1,565 | 67% | 2,501 |
| St Peter's & Canalside | 988 | 1,459 | 48% | 2,447 |
| Highbury | 1,060 | 1,340 | 26% | 2,400 |
| Laycock | 938 | 1,290 | 38% | 2,228 |
| Tufnell Park | 937 | 1,254 | 34% | 2,191 |
| St Mary's & St James' | 1,037 | 1,119 | 8% | 2,156 |
| Tollington | 797 | 1,332 | 67% | 2,129 |
| Mildmay | 837 | 1,212 | 45% | 2,049 |
| Caledonian | 807 | 1,077 | 33% | 1,884 |
| Barnsbury | 805 | 993 | 23% | 1,798 |
| Holloway | 777 | 972 | 25% | 1,749 |
| TOTAL | 16,897 | 25,394 | 50% | 42,291 |

F11. Map 16 shows the distribution of the LB Islington ASB cases. The left-hand map shows the cases as a heat map and the right-hand map shows the heat map overlaid on the dot map of PRS properties.



Map 16 Distribution of ASB calls to the council 2019-2020.

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F12. Table 35 shows the numbers and type of ASB complaints to the council in 2019 and 2020. The highest category of complaint was neighbour nuisance with 18,161 recorded calls. 9.8% of these complaints were in **Clerkenwell** ward. **Finsbury Park** had the highest number of complaints in the categories of 'rowdy or inconsiderate behaviour,' vehicle nuisance / inappropriate use and other ASB.'

Table 35. ASB complaints to the council - complaint types and wards with highest numbers.

| Category | Number of complaints | Highest ward | 2 nd highest ward | 3 rd highest ward |
|---|----------------------|------------------------|------------------------------|------------------------------|
| Animal problems | 1481 | Canonbury | Hillrise | Highbury & Clerkenwell |
| Drugs | 3121 | Hillrise | Finsbury Park | Laycock |
| Environmental ASB (graffiti etc.) | 1809 | Tollington | Bunhill | Arsenal |
| Neighbour nuisance | 18161 | Clerkenwell | Finsbury Park | Junction |
| Noise | 10645 | Bunhill | Clerkenwell | Finsbury Park |
| Rowdy / inconsiderate behaviour | 4360 | Finsbury Park | Hillrise | Arsenal |
| Street population (drinking etc.) | 724 | St Peter's & Canalside | Laycock & Clerkenwell | Caledonian |
| Vehicle nuisance / inappropriate use | 621 | Finsbury Park | St Peter's & Canalside | St Mary's and St James' |
| Other ASB | 1369 | Finsbury Park | Junction | Highbury |
| TOTAL | 42,291 | Finsbury Park | Clerkenwell | Bunhill |

F13. Table 36 shows the combined numbers of ASB complaints to the police and council over two years. The police and council received the highest number of complaints about ASB in Finsbury Park, Clerkenwell, Junction, Bunhill and Hillrise (highlighted in red)

Table 36. Total number of ASB calls over 2019 and 2020.

| Ward | Council ASB complaints 2019-2020 | Police ASB complaints 2019-2021 | Total ASB complaints |
|-----------------------------------|----------------------------------|---------------------------------|----------------------|
| Finsbury Park | 3,698 | 1,873 | 5,571 |
| Clerkenwell | 3,810 | 1,322 | 5,132 |
| Junction | 2,756 | 1,522 | 4,278 |
| Bunhill | 2,915 | 1,211 | 4,126 |
| Hillrise | 2,876 | 1,058 | 3,934 |
| Laycock | 2,228 | 1,435 | 3,663 |
| St Peter's & Canalside | 2,447 | 1,186 | 3,633 |
| Tollington | 2,129 | 1,443 | 3,572 |
| Canonbury | 2,704 | 849 | 3,553 |
| Arsenal | 2,501 | 996 | 3,497 |
| Highbury | 2,400 | 959 | 3,359 |
| St Mary's & St James' | 2,156 | 1,159 | 3,315 |
| Caledonian | 1,884 | 1,292 | 3,176 |
| Tufnell Park | 2,191 | 885 | 3,076 |
| Mildmay | 2,049 | 976 | 3,025 |
| Holloway | 1,749 | 1,089 | 2,838 |
| Barnsbury | 1,798 | 854 | 2,652 |
| TOTAL | 42,291 | 20,109 | 62,400 |

F14. Table 37 shows the ward data on:

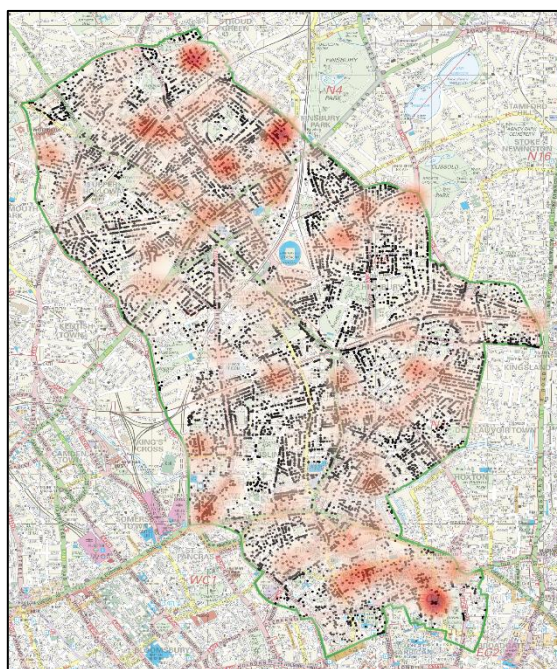
- the number numbers of ASB calls to the council that could be directly related to an PRS property;
- the percentage of all complaint properties that were private rented;
- the percentage of the unique PRS addresses in each ward with an ASB complaint;
- the average number of complaints per PRS property.

The wards with the highest number of ASB complaints relating to PRS properties were **Bunhill, Finsbury Park Hillrise Tollington** and **Caledonian**.

Table 37. Number of ASB complaints at PRS properties and as a percentage of the PRS over 2-year period.

| Ward | ASB complaints relating to PRS properties | Other ASB complaints (incl. street level) | % ASB complaints about PRS properties | Number of unique properties |
|--------------------------|---|---|---------------------------------------|-----------------------------|
| Bunhill | 449 | 2466 | 15.4% | 144 |
| Finsbury Park | 402 | 3296 | 10.9% | 119 |
| Hillrise | 345 | 2531 | 12.0% | 109 |
| Tollington | 268 | 1861 | 12.6% | 124 |
| Caledonian | 248 | 1636 | 13.2% | 110 |
| Canonbury | 238 | 2466 | 8.8% | 104 |
| Mildmay | 220 | 1829 | 10.7% | 97 |
| Tufnell Park | 216 | 1875 | 9.9% | 111 |
| Arsenal | 207 | 2294 | 8.3% | 89 |
| St Peter's and Canalside | 206 | 2241 | 8.4% | 114 |
| Clerkenwell | 206 | 3604 | 5.4% | 106 |
| Highbury | 202 | 2198 | 8.4% | 86 |
| Junction | 201 | 2555 | 7.3% | 96 |
| Barnsbury | 188 | 1610 | 10.5% | 98 |
| Laycock | 180 | 2048 | 8.1% | 86 |
| St Mary's and St James' | 179 | 1977 | 8.3% | 106 |
| Holloway | 127 | 1622 | 7.3% | 67 |
| TOTAL | 4082 | 38209 | 9.7% | 1766 |

- F15. Map 17 shows the council ASB complaints related to PRS addresses. The black dots indicate all PRS addresses, and the red areas indicate PRS ASB complaint hotspots.



Map 17. Council ASB complaints relating to the PRS.

ASB – Conclusions

- F15. ASB complaints are widespread across the borough and have significantly increased in 2020, although this is thought to be due to the COVID-19 lockdowns. Every ward has had over 2,500 complaints in the two years 2019 and 2020, with Finsbury Park and Clerkenwell having has double this amount. Elevated levels of ASB are not exclusive to any one part of the borough, with Clerkenwell and Bunhill in the south and Finsbury Park, Junction and Hillrise in the north being the six wards with the most complaints.
- F16. The 4,082 cases of ASB that have been linked to 1,766 PRS properties, amounting to 9.65% of all ASB and 4.95% of all PRS properties have linked ASB complaints.
- F17. Around one in fifteen PRS properties in the new ward of Hillrise have had an ASB complaint to the council in the last 2 years. Bunhill, Finsbury Park, Tollington and Caledonian wards also have high levels of ASB associated with PRS properties.
- F18. As 8.5 PART E: Poor Property Conditions above explains, wards to the north and west of the borough have been found to have evidence of poor property conditions in the PRS. The evidence for ASB in part correlates with this, although other wards, such as Bunhill and Canonbury appear to have an issue with ASB but do not suffer as high levels of poor property conditions in the PRS.
- F19. ASB is therefore a supporting factor in designating the proposed wards but is not the principal reason.

8.7 PART G: Crime

- G1. To show that crime is a relevant criterion for the area(s) proposed for a selective licensing designation, it must be demonstrated that “the area suffers from high levels of crime, that the criminal activity affects those living in the properties in a proposed selective licensing scheme or other households and businesses in the area and that making a designation will, when combined with other measures taken in the area by the local housing authority, other persons together with the local housing authority or by the police, contribute to a reduction in the levels of crime in the area, for the benefit of those living in the area.”⁵⁸.
- G2. Guidance suggests the authority should have regard to whether the area has displayed a noticeable increase in crime over a relatively short period, such as in the previous 12 months; whether the crime rate in the area is significantly higher than in other parts of the local authority area; or whether the crime rate is higher than the national average. In particular, the local housing authority may want to consider whether the impact of crime in the area affects the local community and the extent to which a selective licensing scheme can address the problems.
- G3. The licensing scheme must be part of a wider strategy to address crime in the designated area and can only be made if a high proportion of properties in that area are in the private rented sector. In particular the local housing authority should consider:
- whether the criminal activities impact on some people living in privately rented accommodation as well as others living in the areas and businesses therein;
 - the nature of the criminal activity, e.g., theft, burglary, arson, criminal damage, graffiti;
 - whether some of the criminal activity is the responsibility of some people living in privately rented accommodation.⁵⁹
- G4. Islington Police recorded 23,189 total notifiable offences during the period between 1 April 2020 and 31 March 2021, representing a 24% decrease in crime compared to the same period in 2019/20. The significant reductions can be partly attributed to the COVID-19 lockdowns.
- G5. Metropolitan Police statistics for the years 2019 and 2020⁶⁰ also showed a decrease in all recorded crime of 16.6% in Islington, compared with a 14.2% decrease for the whole of London. For residential burglary, which significantly affects the local community, there was a decrease of 20.6% compared to 21.8% for London.

Table 38 shows the total number of crimes by type for existing ward for the period between 1 April 2019 and 31 March 2020. Bunhill ward had the highest total crime numbers (3,249 cases).

⁵⁸ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 – [Article 7](#)

⁵⁹ Selective licensing in the private rented sector - A Guide for local authorities

⁶⁰ Metropolitan Police. https://data.london.gov.uk/dataset/recorded_crime_summary

Table 38. Total crime by Home Office (major and minor) categories by existing Islington wards.

| Crime Category | Barnsbury | Bunhill | Caledonian | Canobury | Clerkenwell | Finsbury Park | Highbury East | Highbury West | Hillrise | Holloway | Junction | Mildmay | St Georges | St Mary's | St. Peter's | Tollington | Total |
|------------------------------------|-----------|---------|------------|----------|-------------|---------------|---------------|---------------|----------|----------|----------|---------|------------|-----------|-------------|------------|-------|
| Burglary | 81 | 265 | 154 | 139 | 209 | 163 | 191 | 180 | 82 | 139 | 175 | 132 | 124 | 167 | 134 | 165 | 2500 |
| - Residential | 50 | 109 | 89 | 121 | 85 | 96 | 138 | 141 | 74 | 108 | 136 | 120 | 105 | 80 | 76 | 126 | 1654 |
| - other | 31 | 156 | 65 | 18 | 124 | 67 | 53 | 39 | 8 | 31 | 39 | 12 | 19 | 87 | 58 | 39 | 846 |
| Criminal damage | 102 | 124 | 110 | 102 | 87 | 109 | 74 | 111 | 77 | 103 | 110 | 83 | 62 | 117 | 72 | 98 | 1541 |
| Drugs | 128 | 85 | 142 | 49 | 77 | 123 | 101 | 113 | 61 | 83 | 72 | 57 | 57 | 139 | 100 | 53 | 1440 |
| Fraud / Forgery | <5 | 8 | 5 | <5 | <5 | 6 | 5 | 5 | <5 | <5 | 7 | <5 | <5 | 6 | <5 | 8 | 73 |
| Other accepted crime | 142 | 199 | 189 | 141 | 155 | 194 | 131 | 188 | 197 | 232 | 184 | 155 | 109 | 186 | 165 | 178 | 2745 |
| Other notifiable offences | 41 | 20 | 62 | 23 | 23 | 31 | 25 | 28 | 15 | 32 | 25 | 26 | 22 | 45 | 26 | 21 | 465 |
| Robbery | 98 | 201 | 77 | 39 | 87 | 159 | 123 | 118 | 37 | 45 | 119 | 104 | 78 | 120 | 121 | 51 | 1577 |
| Sexual Offences | 32 | 54 | 43 | 10 | 34 | 36 | 23 | 29 | 22 | 29 | 27 | 21 | 27 | 40 | 27 | 18 | 472 |
| Theft / Handling | 881 | 1771 | 998 | 479 | 1133 | 1121 | 851 | 683 | 328 | 483 | 674 | 659 | 424 | 1637 | 984 | 559 | 13665 |
| Violence against the person | 456 | 522 | 593 | 260 | 391 | 643 | 393 | 479 | 302 | 454 | 397 | 374 | 284 | 606 | 381 | 424 | 7059 |
| Total | 1965 | 3249 | 2373 | 1244 | 2199 | 2585 | 1917 | 1934 | 1124 | 1603 | 1890 | 1614 | 1189 | 3063 | 2013 | 1575 | 31537 |

- G6. Police statistics for the years 2018 and 2019 show an increase in all crime and residential burglary in Islington of 5.8% and 26.4% respectively. This compares with the whole of London, which had an increase of 9.7% in all crime, but a decrease of 0.2% in residential burglary. What we cannot know is whether crime levels will increase again to similar levels as 2018/19 once the pandemic is over.

Figure 31 shows the long-term crime trend between April 2015 and March 2021. This covers the following crime types:

- violence against the person
- sexual offences
- robbery
- burglary
- vehicle offences
- theft
- arson and criminal damage
- drug offences
- possession of weapons
- public order offences
- miscellaneous crimes against society.

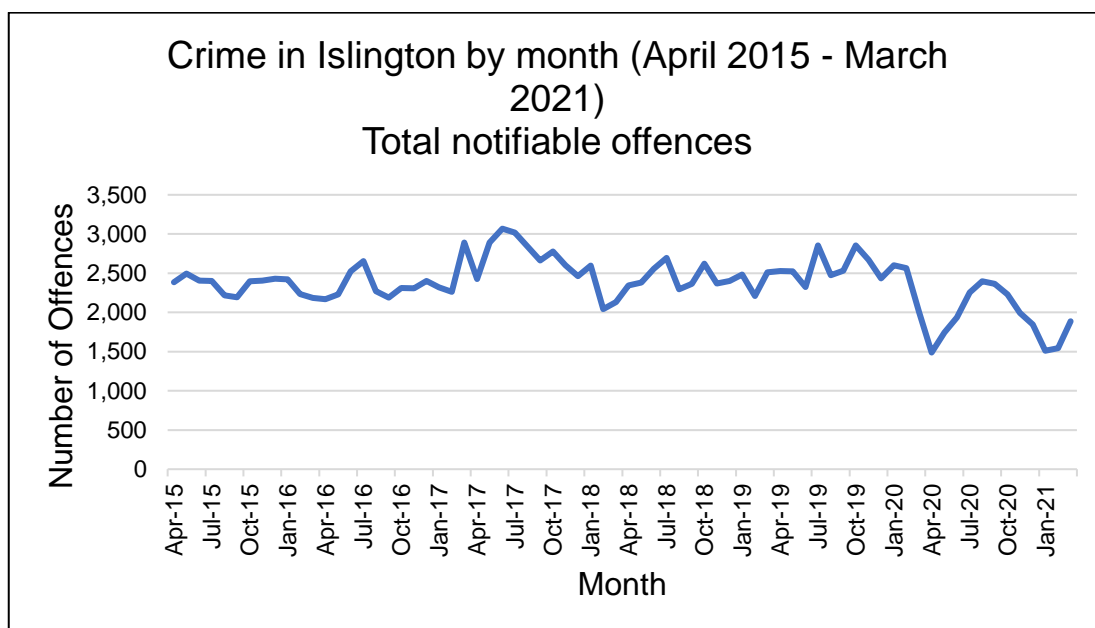


Figure 31. Islington long term crime trend.

- G7. Based on the Home Office crime types for 2020/21, Islington is ranked highly across the London for personal robbery (6th out of 32 boroughs) – partially driven by pedal cycle enabled crime, theft, and handling (7th out of 32 boroughs).
- G8. There has been a 14% increase in robbery offences in Islington in the past 12 months, compared to the same period the previous year, although levels are lower than earlier in 2018. A group who were known to be offending in the north of the borough were identified and the necessary support and enforcement measures were put in place. Figure 32 shows the long-term trend for robbery in Islington.

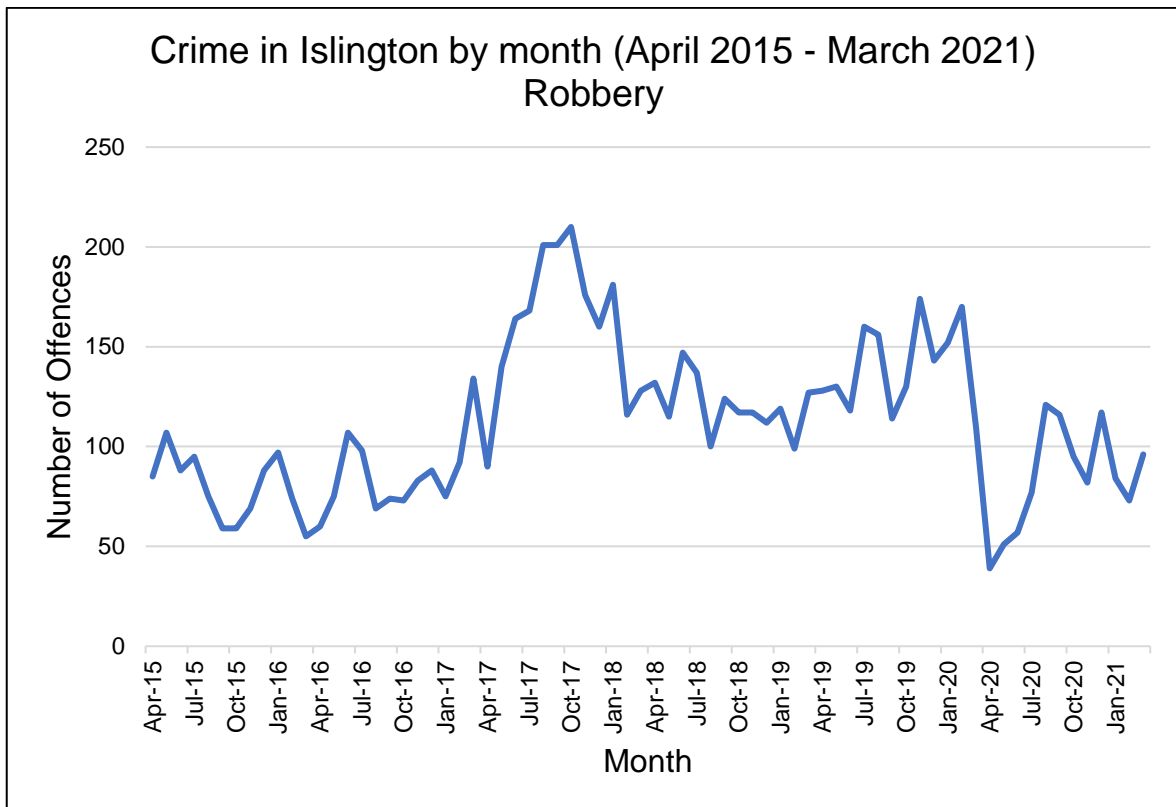


Figure 32. Islington long term robbery trend.

G9. Islington has also recorded an increase in public order offences. Some of this can be attributed to an increase in neighbour complaints, also tensions raised due to COVID-19 (i.e., people not wearing masks) and street-based harassment. Figure 33 shows the long-term trend in public order offences.

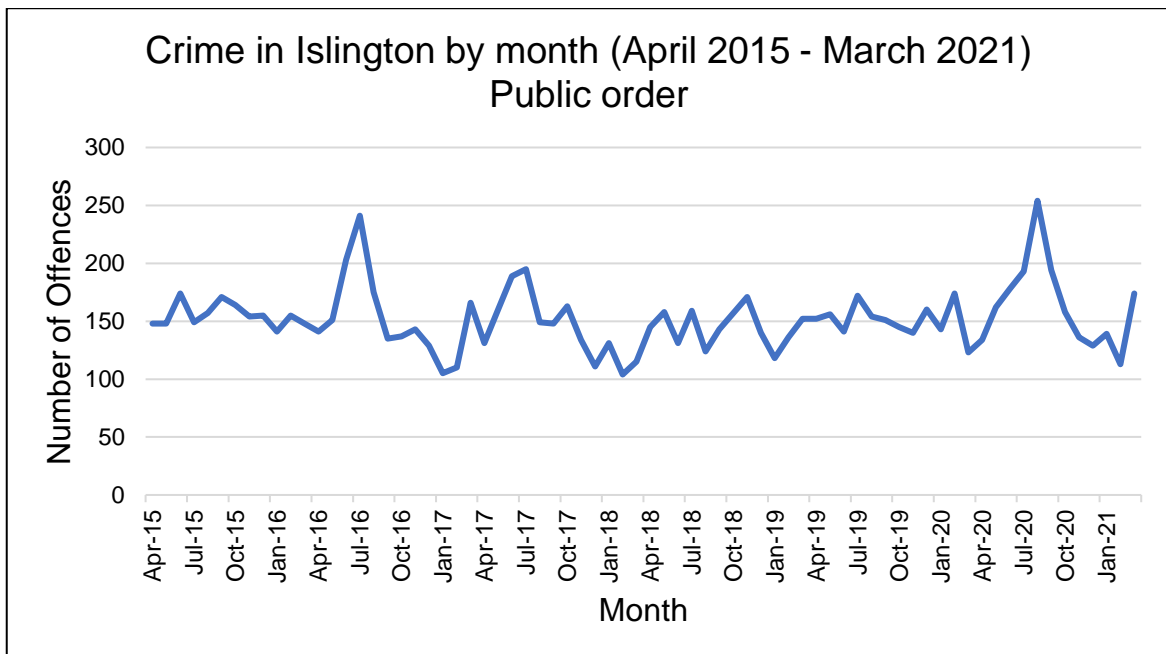


Figure 33. Islington long term public order trend.

- G10. Islington has recorded significant reductions in the volume of moped related crime, however, is still ranked 3rd out of 32 London Boroughs. Islington is ranked 2nd out of 32 boroughs for pedal cycle enabled crime, which is still a high-volume category of crime on the borough linked to theft snatches and robberies.
- G11. Islington has recorded significant reductions in youth violence (a 35% reduction), recording reductions higher than the rest of London which was 31% reduction, however there are still some significant ongoing tensions among groups of young people on the borough. Islington has recorded a 5% reduction in knife crime (non-domestic) where the victim was aged between 1 and 24. Across London there have been a larger reduction of 25%.

Figure 34 shows the long-term trend for violence against the person.

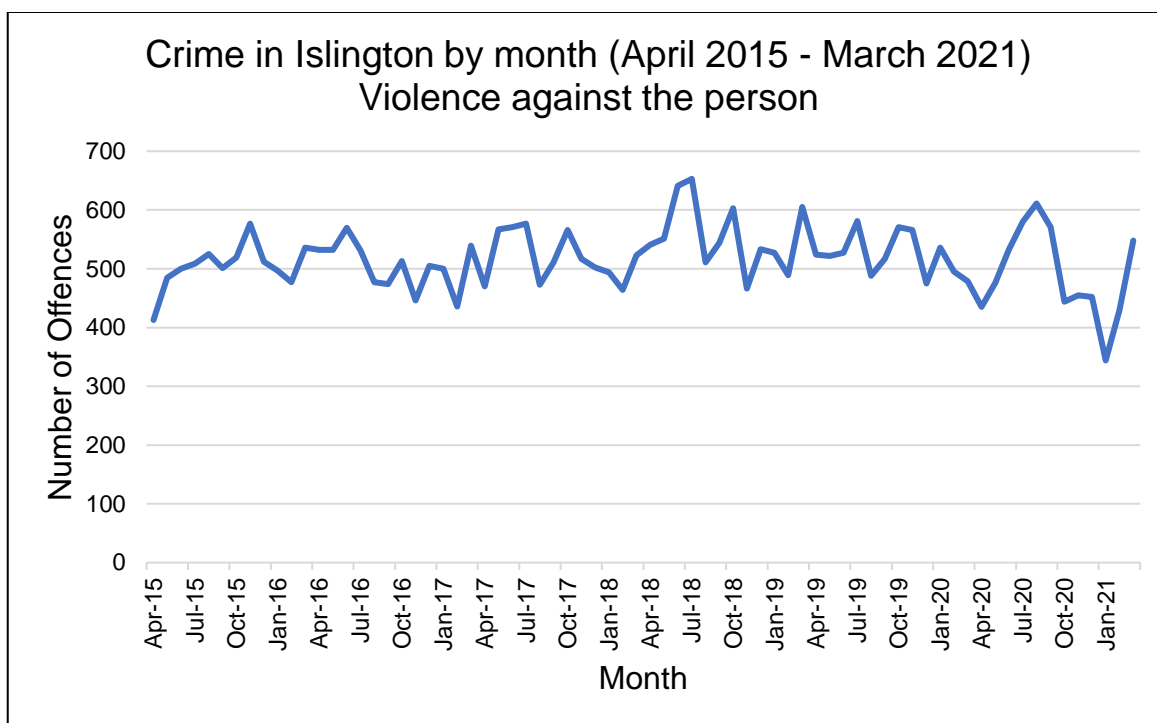


Figure 34. Islington long term violence against the person trend.

- G12. Islington has recorded a 2.5% increase in detections of domestic abuse offences and was ranked 1st out of 32 for the highest level of detections for the 12-month period between 1 April 2020 and 31 March 2021.
- G13. As mentioned above, residential burglary reduced by around one fifth in 2020. Figure 35 shows the long-term trend in burglary in Islington.

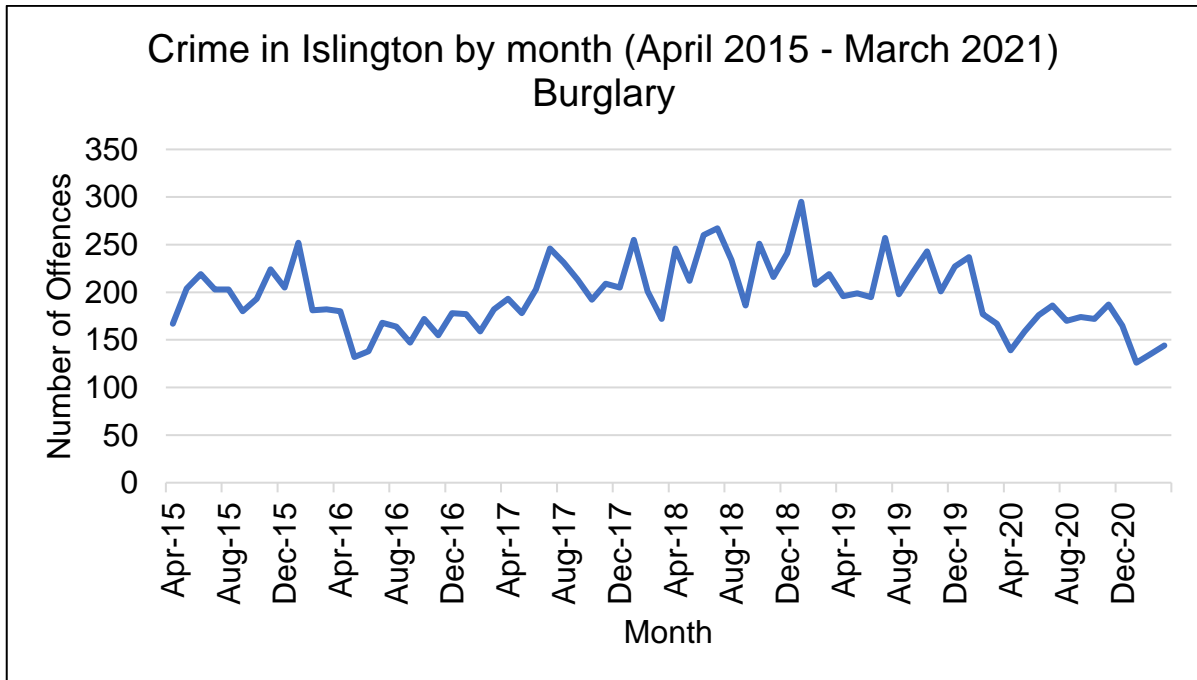


Figure 35. Islington long term burglary trend.

G14. Figure 36 shows the long-term trend in theft, Figure 37 in sexual offences, Figure 38 vehicle offences, Figure 39 criminal damage and arson, Figure 40 drug offences and Figure 41 possession of offensive weapons trend.

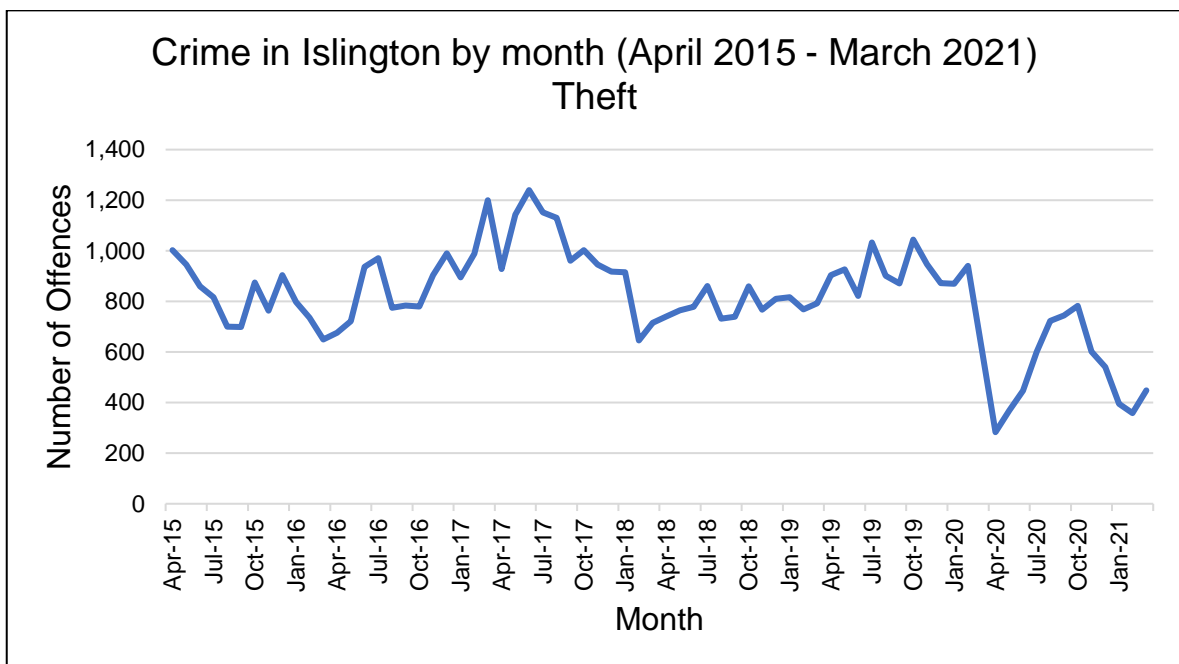


Figure 36. Islington long term theft trend.

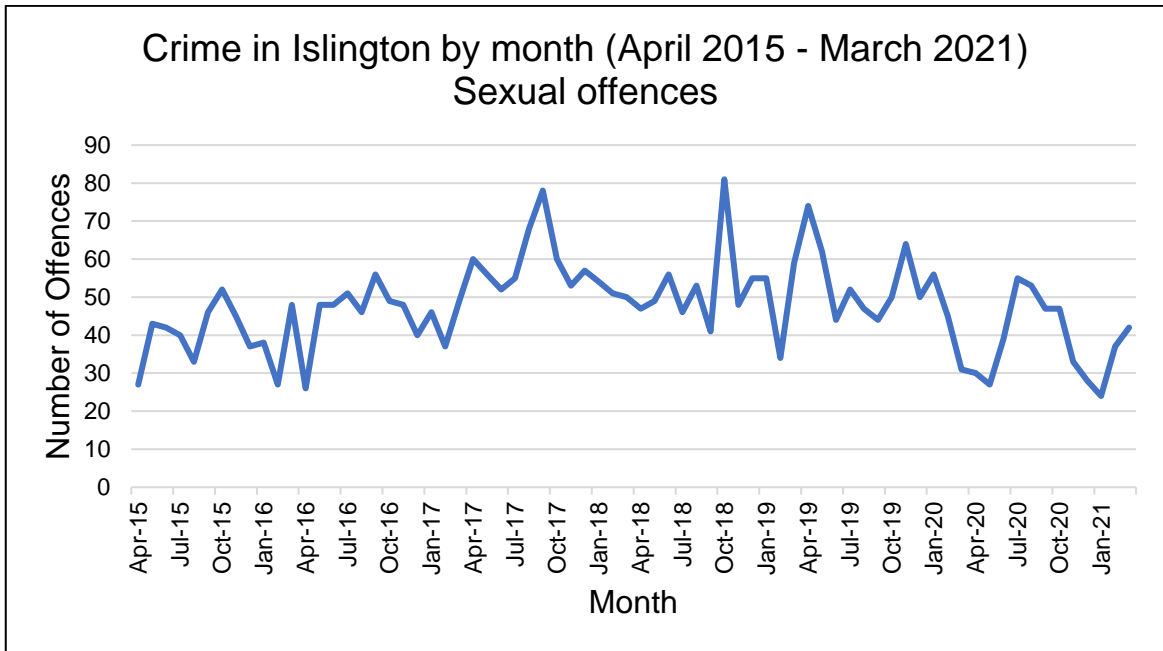


Figure 37. Islington long term sexual offences trend.

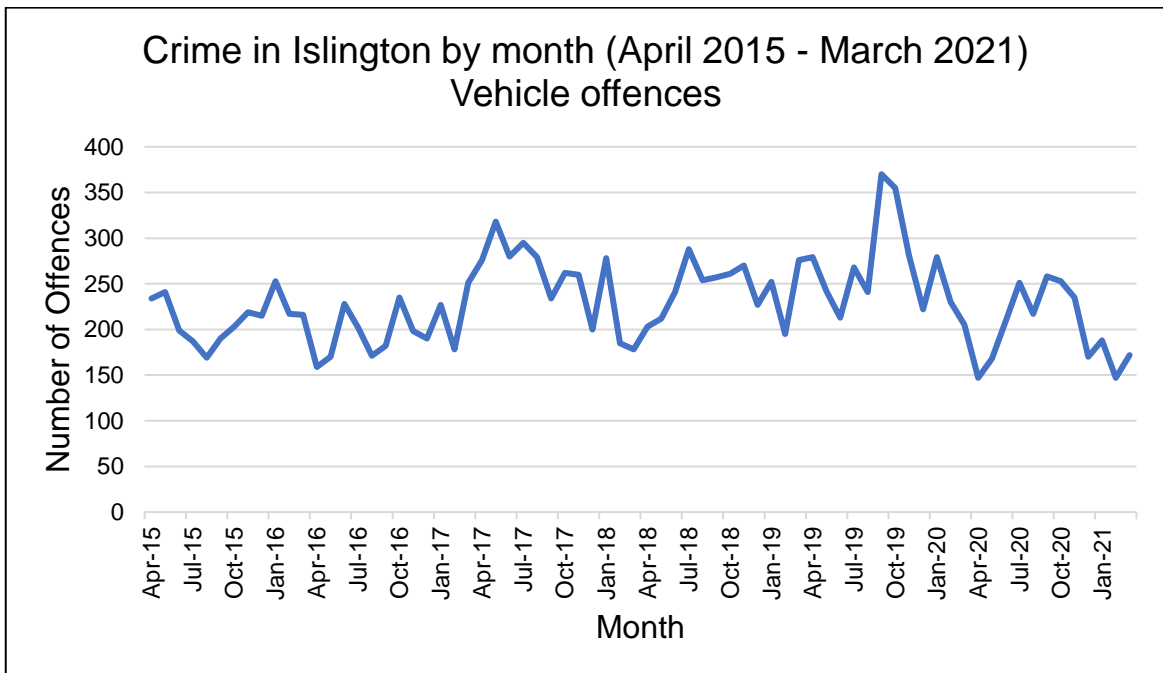


Figure 38. Islington long term vehicle offences trend.

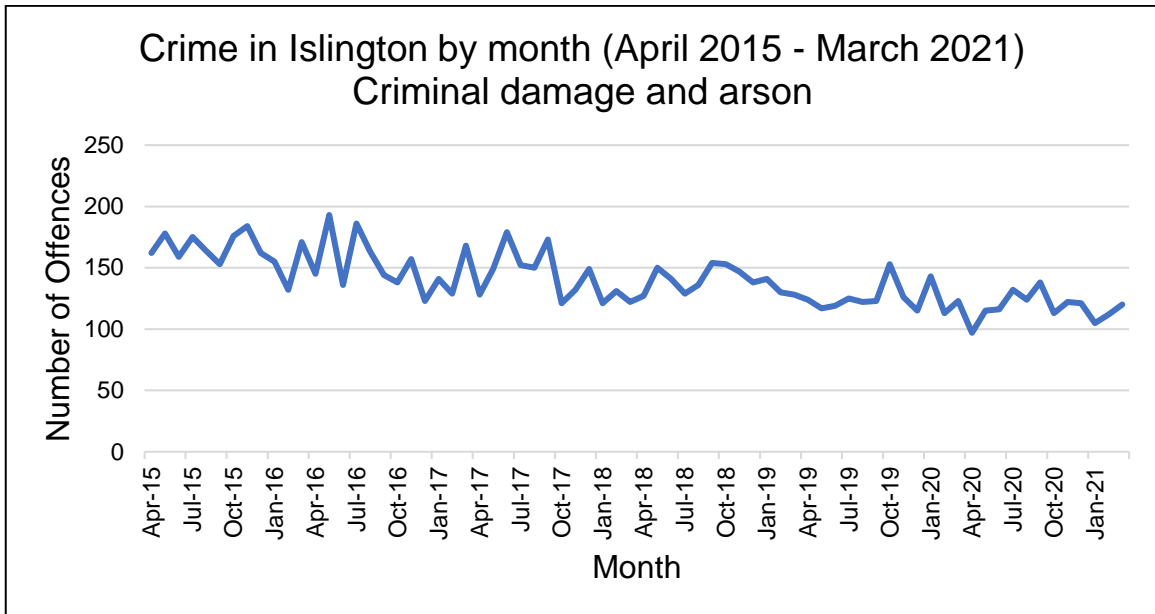


Figure 39. Islington long term criminal damage and arson trend.

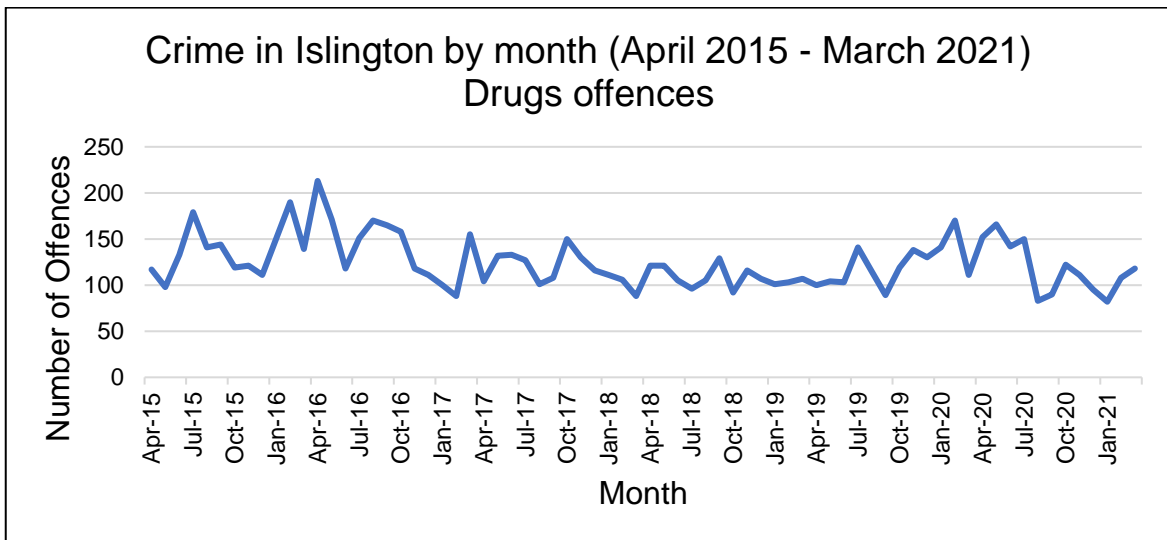


Figure 40. Drug offences by month.

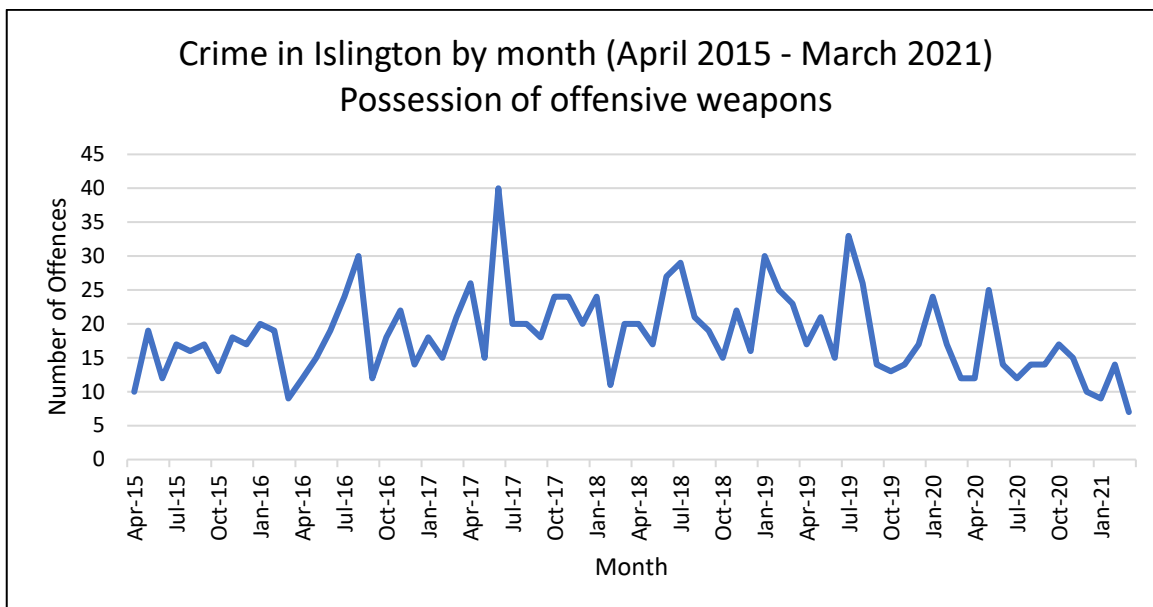


Figure 41. Islington long term possession of offensive weapons trend.

- G15. Crime statistics have reduced nationally due to the COVID-19 pandemic, with fewer residential burglaries due to people staying at home. In analysing crime data and the PRS, it is more indicative therefore to look back at the previous 12 months for a more representative position.
- G16. Data was analysed for the two full calendar years of 2019 and 2020. The new ward of **Finsbury Park** recorded the highest volume of crime in the borough in 2020 (2,526 offences), whilst the new ward of **St. Mary's & St. James'** had the highest total across the two years. **Canonbury** was the only ward that recorded an increase in crime in 2020 compared to 2019, however, the ward still recorded the fifth lowest overall volume. Bunhill recorded the largest reduction in crime in 2020 compared to 2019 (-34%). Table 39 shows the total crime per new ward for 2019 and 2020 across the relevant categories for consideration for selective licensing. Those above average are highlighted in red.

Table 39. Crime cases in 2019 and 2020 per new ward.

| Ward | Crime in 2019 | Crime in 2020 | Percentage Change | Crime cases 2019 & 2020 |
|------------------------|---------------|---------------|-------------------|-------------------------|
| St Mary's & St James' | 2,803 | 2,342 | -16% | 5,145 |
| Finsbury Park | 2,551 | 2,526 | -1% | 5,077 |
| Bunhill | 2,697 | 1,782 | -34% | 4,479 |
| Clerkenwell | 2,413 | 1,808 | -25% | 4,221 |
| Laycock | 2,155 | 1,997 | -7% | 4,152 |
| Caledonian | 2,232 | 1,588 | -29% | 3,820 |
| Junction | 1,895 | 1,730 | -9% | 3,625 |
| St Peter's & Canalside | 1,851 | 1,392 | -25% | 3,243 |
| Mildmay | 1,666 | 1,576 | -5% | 3,242 |
| Tollington | 1,755 | 1,443 | -18% | 3,198 |
| Barnsbury | 1,785 | 1,311 | -27% | 3,096 |
| Highbury | 1,601 | 1,477 | -8% | 3,078 |
| Hillrise | 1,449 | 1,230 | -15% | 2,679 |
| Tufnell Park | 1,309 | 1,219 | -7% | 2,528 |
| Canonbury | 1,242 | 1,281 | 3% | 2,523 |
| Arsenal | 1,241 | 1,103 | -11% | 2,344 |
| Holloway | 1,198 | 1,041 | -13% | 2,239 |
| TOTAL | 31,843 | 26,846 | -16% | 58,689 |

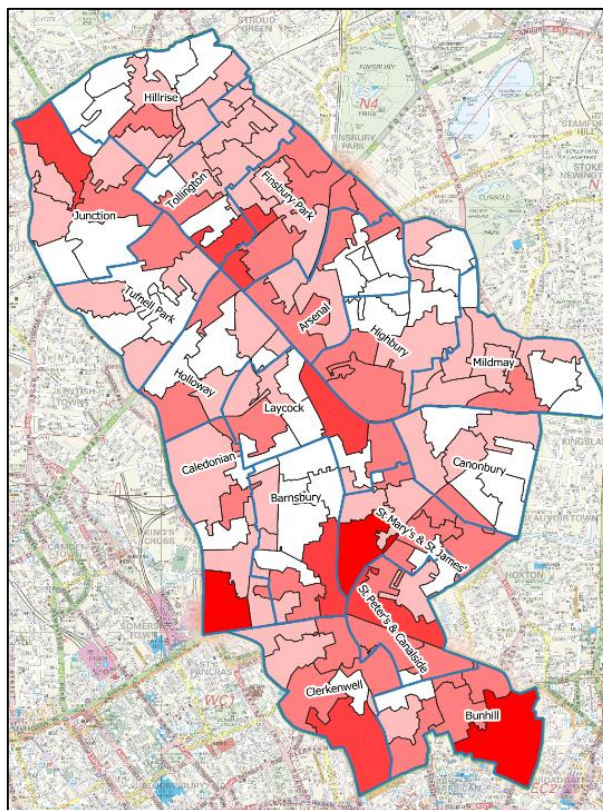
G17. Table 40 shows the numbers of offences against each offence type and the three wards with the highest numbers of offences per category. Theft and handling had the most offences (23,780), followed by violence against the person (14,254) over the two years. **Finsbury Park** had the highest number of offences for drugs, robbery, and sexual offences. **St. Mary's & St. James'** was in the top three wards in all but two categories.

Table 40. Offence types and three wards with highest numbers of cases over 2019 & 2020.

| Category | Number of offences | Highest ward | 2 nd highest ward | 3 rd highest ward |
|------------------------------------|--------------------|---------------|------------------------------|---------------------------------|
| Burglary | 4743 | Clerkenwell | Highbury | Bunhill |
| Criminal damage | 3013 | Junction | Finsbury Park | St Mary's and St James' |
| Drugs | 2905 | Finsbury Park | Caledonian | St Mary's and St James' |
| Other accepted crime | 5658 | Hillrise | St Mary's and St James' | Finsbury Park |
| Other notifiable offences | 877 | Caledonian | Finsbury Park | St Mary's and St James'/Laycock |
| Robbery | 2601 | Finsbury Park | Junction | Bunhill |
| Sexual offences | 858 | Finsbury Park | St Mary's and St James' | Caledonian |
| Theft and handling | 23780 | Bunhill | St Mary's and St James' | Finsbury Park |
| Violence against the person | 14254 | Finsbury Park | St Mary's and St James' | Laycock |

G18. Police data is not available for crime in relation to specific addresses and so it is not possible to correlate crime data with PRS data.

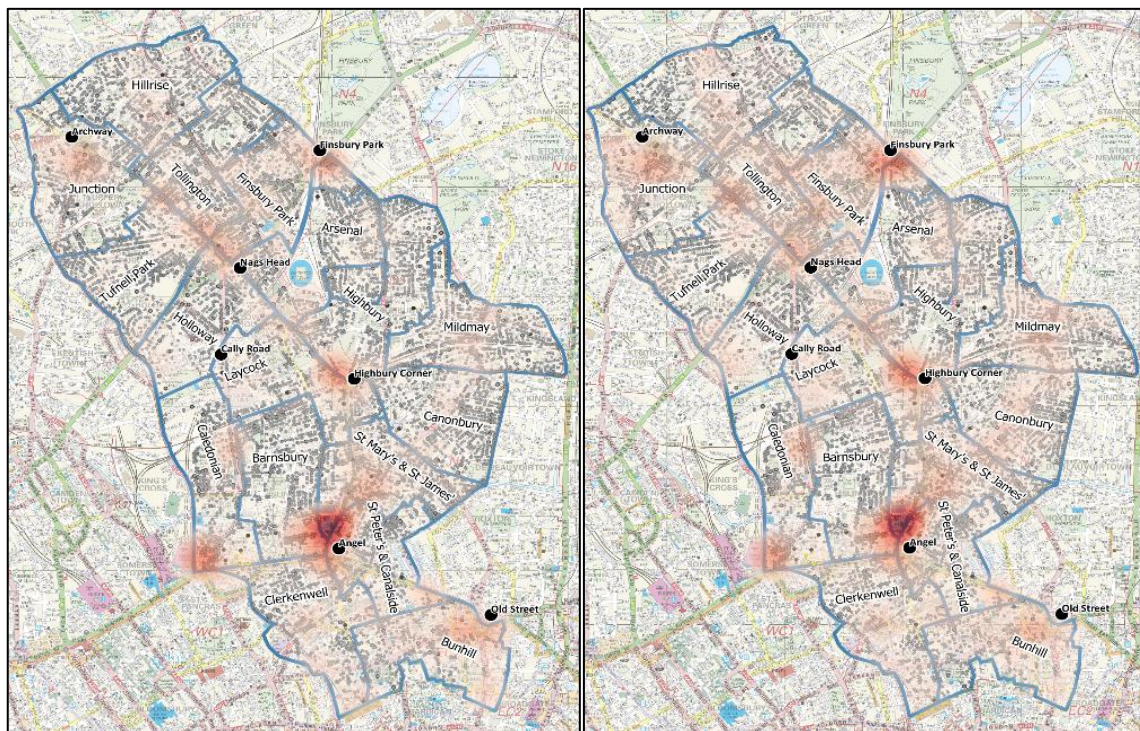
G19. Map 18 shows the distribution of volumes of crime by Lower Super Output Areas (LSOA) overlaid on the new ward boundaries from the 2019 data. The LSOAs with the highest numbers are shaded in the darkest red. It can be seen that every ward has areas where crime levels are high. Crime levels are highest in the south of the borough.



Map 18 Distribution of all crime (volume) across LSOAs in Islington.

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G20. Map 19 shows the distribution of crime offences by grey dots and concentrations overlaid by the red heat shading. 2019 crime is on the left and 2020 on the right. There are high concentrations around areas such as Angel, Highbury Corner and Finsbury Park. Although numbers were higher in 2019, the distribution is very similar.



Map 19 Distribution of 2019 and 2020 crime offences.

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Crime – Conclusions

- G21. High levels of crime are not exclusive to any one part of the borough. Criminal offences are widespread, although they decreased in 2020, which is thought to be due to the COVID-19 lockdowns. Every ward has had over 2,200 offences in the two years 2019 and 2020, with **St. Mary's & St. James'** and **Finsbury Park** having double this amount.
- G22. As the data for 2019 to 2020 is not representative due to COVID-19, it is more relevant to consider the data from 2018 to 2019. There was an increase in Islington for overall crime less than the London average, but a much higher increase in burglary compared to the London average. There is no doubt that the area suffers from high levels of crime and that the criminal activity will affect those living in the PRS. Islington displayed a noticeable increase in crime over a brief period (between 2018 and 2019). The crime rate in the wards of **St. Mary's & St. James', Finsbury Park, Bunhill, Clerkenwell, Laycock, Caledonian** and **Junction** is significantly higher than in other parts of the local authority area.
- G23. As Section 8.5 – PART E explains, wards to the north and west of the borough have been found to have evidence of poor property conditions in the PRS. The evidence for crime in part correlates with this, although other wards, such as St. Mary's & St. James', Bunhill and Clerkenwell appear to have high levels of crime, but do not suffer as high levels of poor property conditions in the PRS.

Crime is therefore a supporting factor in designating the proposed wards but is not the principal reason.

8.8 PART H: Deprivation

- H1. To show that deprivation is a relevant criterion for a selective licensing designation, it must be demonstrated that the area is suffering from a high level of deprivation, which affects a significant number of private renters and 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, contribute to a reduction in the level of deprivation in the area⁶¹.
- H2. These are the relevant indicators of deprivation:
- the employment status of adults
 - the average income of households
 - the health of households
 - the availability and ease of access to education, training and other services for households
 - housing conditions
 - the physical environment
 - levels of crime.
- H3. The following data has been taken from the English Indices of Deprivation 2019 - Index of Multiple Deprivation (IMD).⁶²
- H4. The Indices of Multiple Deprivation (IMD) 2019, ranked Islington as the 53rd most deprived local authority area in England (out of 317 local authorities), using the rank of average score method. This was down from being the 24th most deprived in the previous IMD in 2015. Islington is now the 6th most deprived local authority in London, down from 5th in 2015. Islington has the tenth highest level of income deprivation affecting children, and fourth highest in England for income deprivation affecting older people.

Index of Multiple Deprivation – Overall rank

- H5. The country is divided into 32,844 Lower Super Output Area (LSOAs) and there are 123 LSOAs in Islington. All LSOAs are given an overall rank based upon the level of deprivation across all the indices, where the area ranked 1 is deemed the most deprived in the country and the area ranked 32,844 is the least deprived.
- H6. The most deprived LSOA in Islington is in Junction ward and the least deprived LSOA is Islington Holloway ward
- H7. Table 41 lists the existing wards in order of 2019 IMD ranking, with the most deprived at the top. Wards with a higher ranking compared to 2015 are highlighted red and those with a lower ranking are highlighted green.

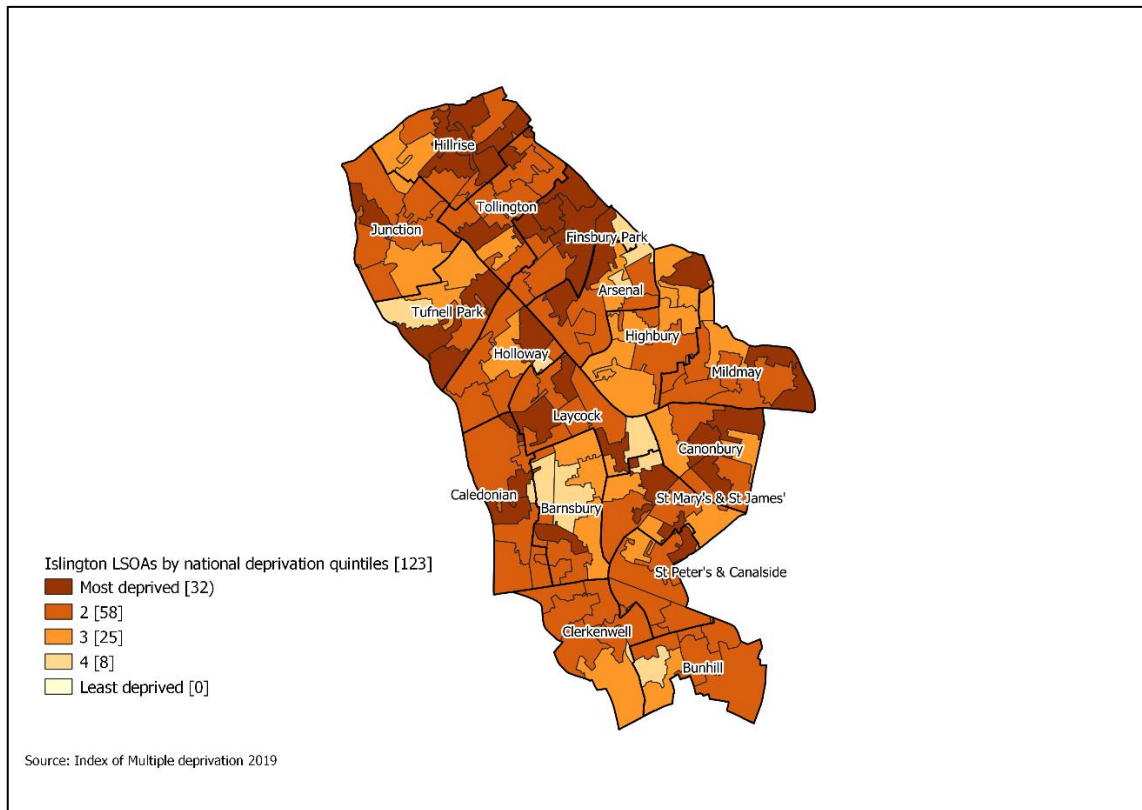
⁶¹ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 - [Article 6](#)

⁶² <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Table 41. Rank and average deprivation score using the 2019 IMD,

| Rank in 2019 | Existing ward | Average 2019 IMD score |
|--------------|---------------|------------------------|
| 1 | Finsbury Park | 34.4 |
| 2 | Junction | 30.9 |
| 3 | Tollington | 30.8 |
| 4 | Caledonian | 30.2 |
| 5 | Hillrise | 30.2 |
| 6 | Holloway | 29.2 |
| 7 | Mildmay | 29.0 |
| 8 | St George's | 28.4 |
| 9 | Canonbury | 28.3 |
| 10 | St Peter's | 27.3 |
| 11 | Clerkenwell | 25.9 |
| 12 | St Mary's | 25.6 |
| 13 | Barnsbury | 24.0 |
| 14 | Highbury West | 24.0 |
| 15 | Bunhill | 23.7 |
| 16 | Highbury East | 20.8 |

- H8. Map 20. Map of Islington LSOAs, by national deprivation quintiles, 2019 IMD. shows the 123 LSOAs shaded according to the national deprivation quintiles, where the darkest shaded LSOAs are the in the most deprived 20% nationally with an overlay showing the new ward boundaries.



Map 20. Map of Islington LSOAs, by national deprivation quintiles, 2019 IMD.

H9. Although LSOA boundaries are not matched to the new ward boundaries, however, it has been possible to translate the IMD 2019 quintiles to the new wards with reasonable accuracy. Figure 42 shows the total number of LSOAs in the 1st quintile, (ie 20% most deprived nationally) per new ward and the total number of LSOAs in each ward. 32 out of 123 LSOAs are in the 1st quintile nationally. **Finsbury Park** had the most, followed by **Hillrise**.

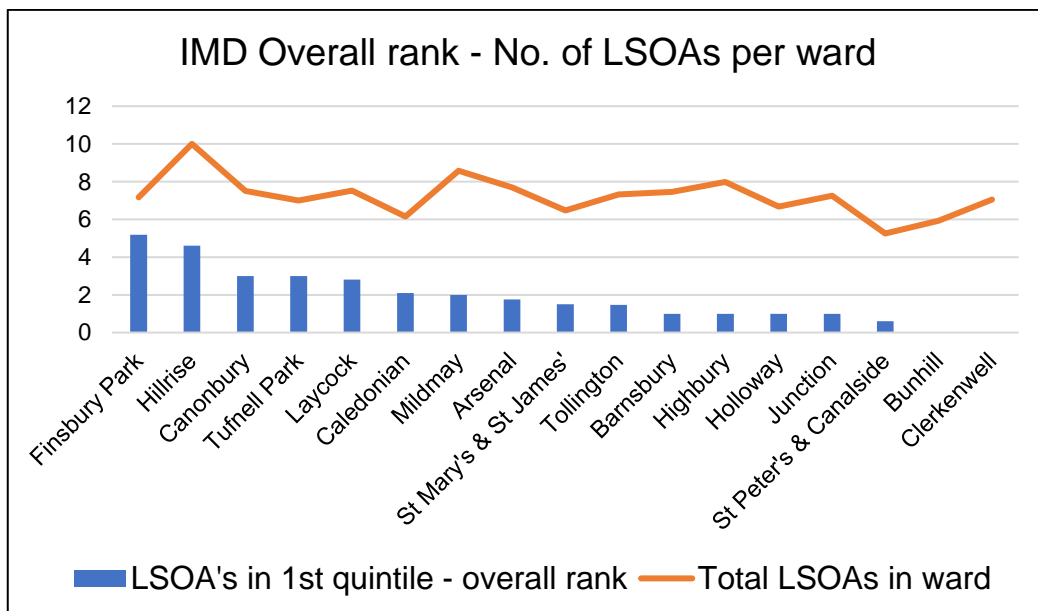


Figure 42. Number of LSOAs in top 20% most deprived areas nationally.

IMD – Employment rank

- H10. This domain measures the proportion of the working age population in an area involuntarily excluded from the labour market.
- H11. Figure 43 shows that **Hillrise**, **Finsbury Park** and **Tufnell Park** wards are the most deprived for this domain.

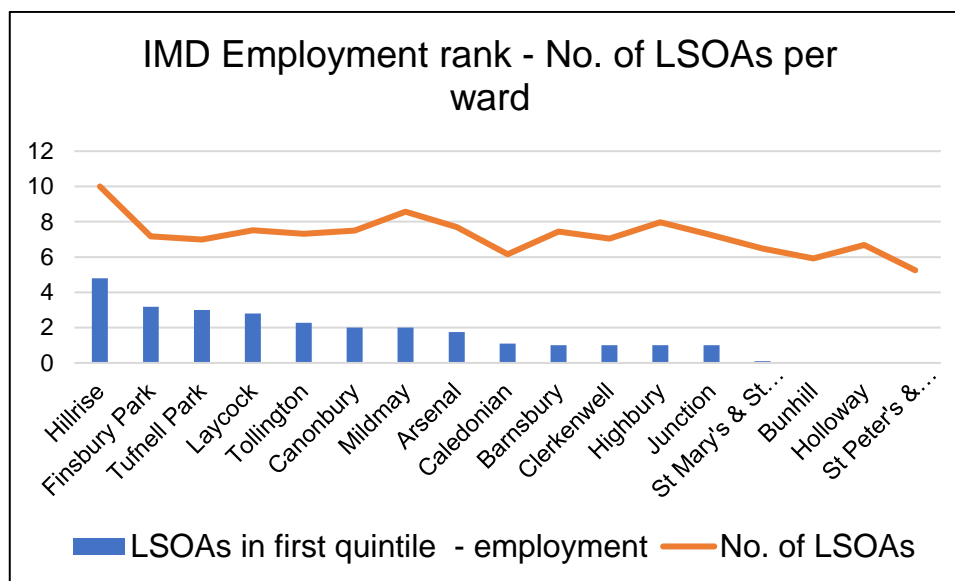


Figure 43. Number of LSOAs in top 20% most deprived for employment.

IMD – Income rank

- H12. This domain measures the proportion of the population experiencing deprivation relating to low income.
- H13. Figure 44 shows that **Hillrise** and **Finsbury Park** wards have most LSOAs in the top quintile.

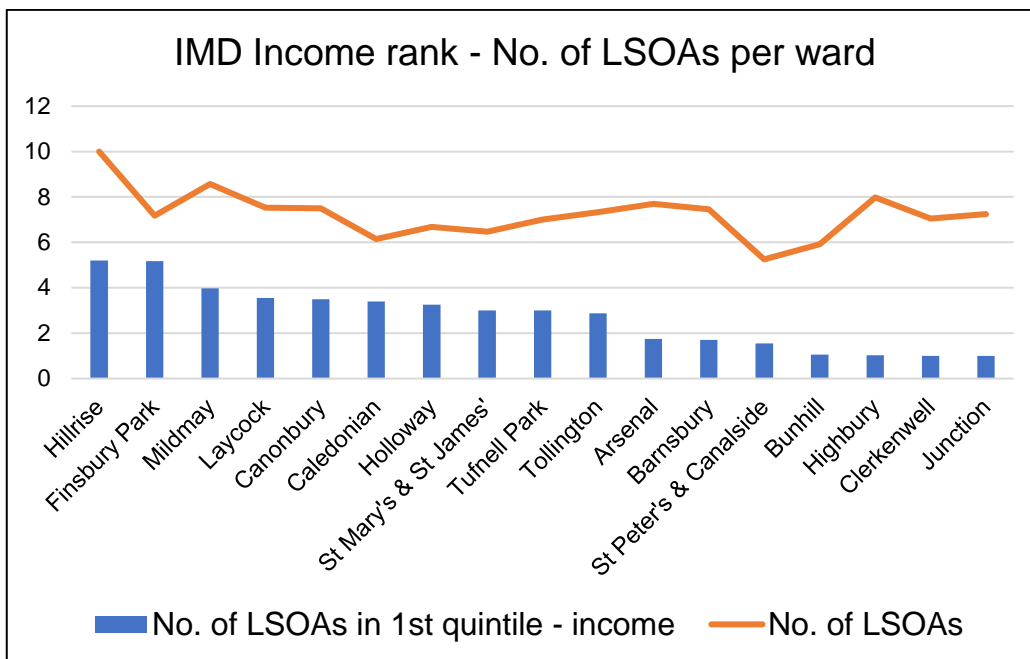


Figure 44. Number of LSOAs in top 20% most deprived for income.

IMD – Health and disability rank

- H14. This domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health.
- H15. Figure 45 shows **Mildmay, Tufnell Park, Hillrise** and **Laycock** wards are the most deprived areas for health and disability.

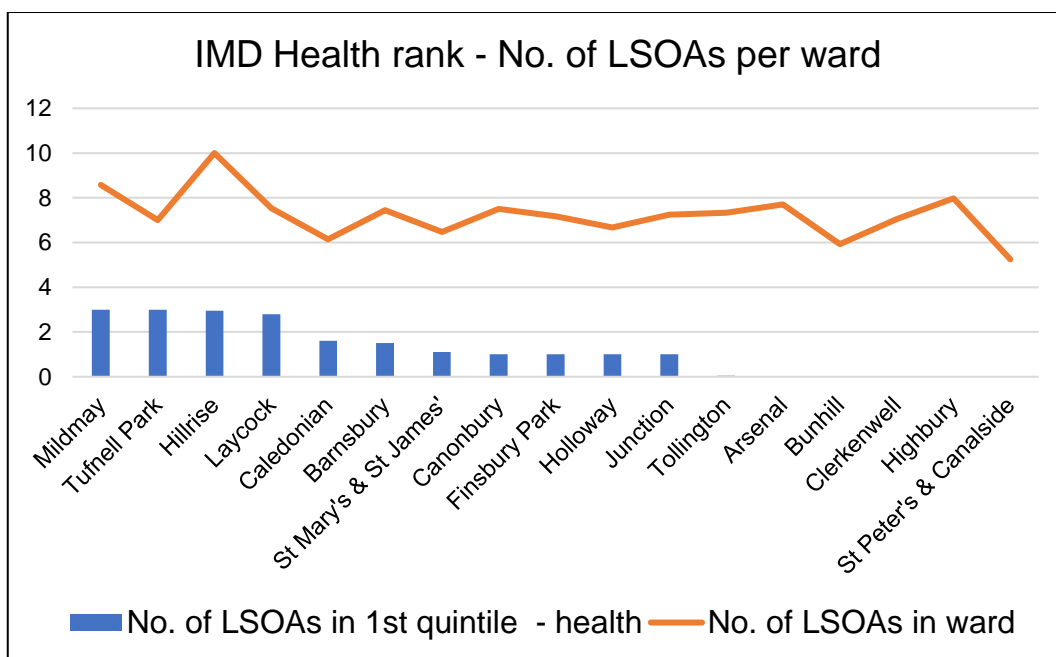


Figure 45. Number of LSOAs in top 20% most deprived for health.

IMD – Ease of access to education and training

- H16. This domain measures the lack of attainment and skills in the local population.

H17. For the education and training index, one LSOA, located in the St. Mary's & St. James' and St. Peter's & Canalside wards. is in the 1st quartile (top 25%)

IMD – Barriers to housing and services

H18. This domain measures the physical and financial accessibility of housing and local services.

H19. There are 32 out of 123 LSOAs across the borough falling into the most 20% deprived band for this domain. Figure 46 shows the number of LSOAs in the 20% most deprived for barriers to housing per ward. **Holloway, Arsenal, Finsbury Park, Bunhill and Tufnell Park** have the most LSOAs in the 1st quintile.

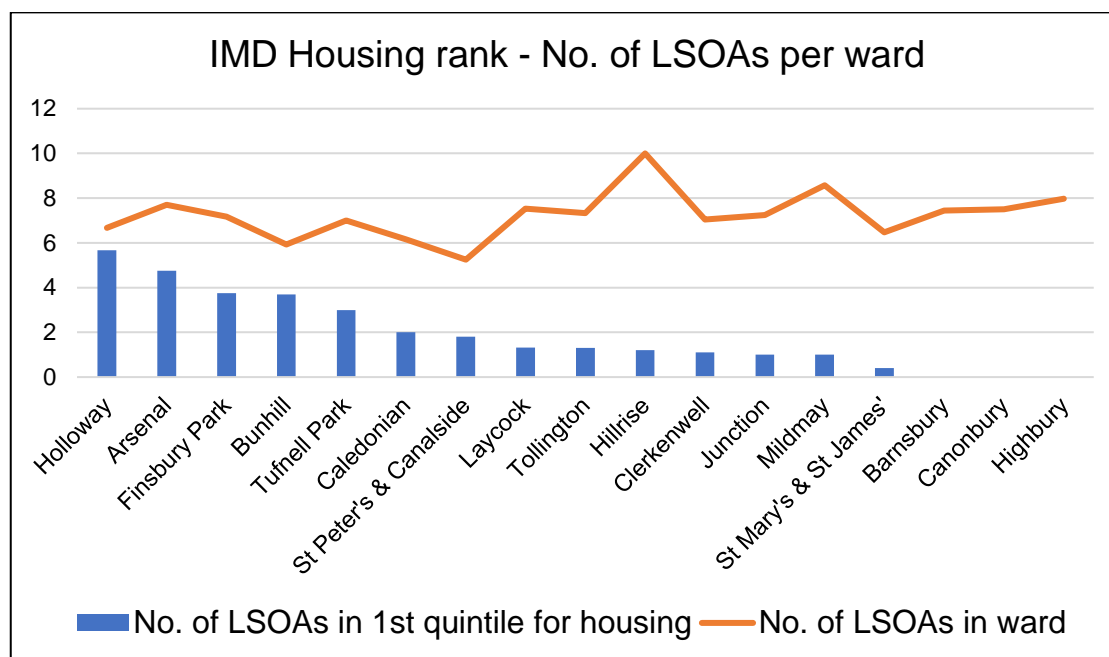


Figure 46. Number of LSOAs in top 20% most deprived for barriers to housing and services.

IMD – Living Environment

H20. This domain measures the quality of both the indoor and outdoor local environment.

H21. 60 out of 123 LSOAs in Islington are in the most deprived 20% nationally for this domain. Figure 47 shows all LSOA's in St. Peter's & Canalside ward fall within this band. An LSOA in Arsenal ward is the 79th most deprived nationally for this index. **Arsenal, Clerkenwell, St. Peter's & Canalside, Bunhill, St. Mary's & St. James'** and **Junction** wards are the most deprived for the living environment.

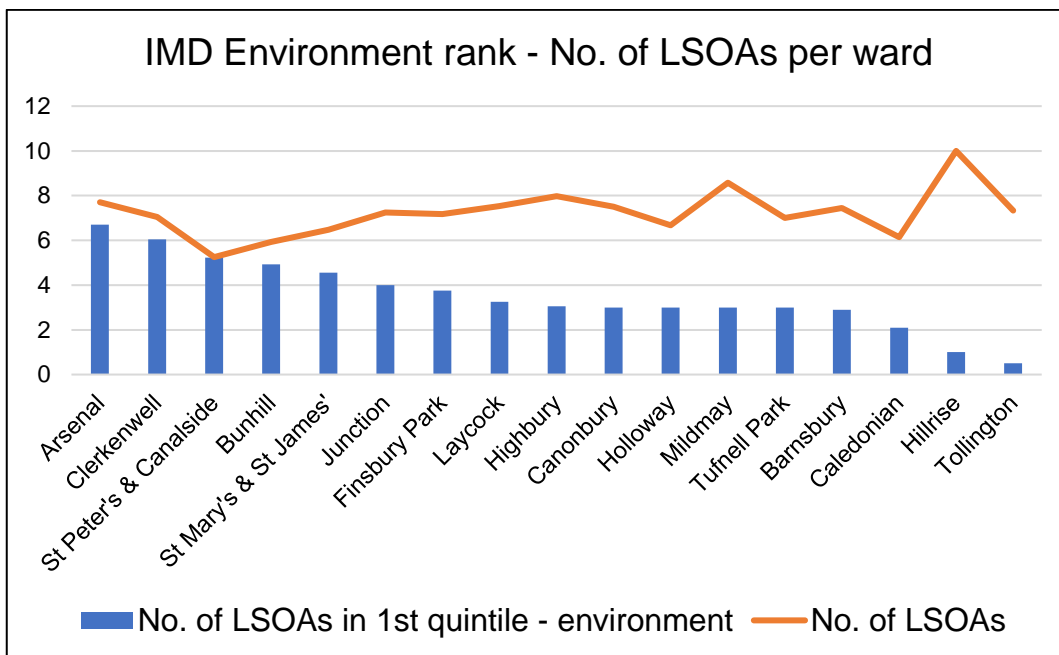


Figure 47. Number of LSOAs in top 20% most deprived for the living environment.

IMD – Crime

H22. This domain measures the risk of personal and material victimisation at local level.

H23. 55 out of 123 LSOA's in Islington that fall within the 20% most deprived areas nationally for this domain. **Junction, Tollington, Finsbury Park, Canonbury, Laycock and Tufnell Park** wards are the most deprived for crime. One LSOA in Junction ward is the 176th most deprived for crime nationally.

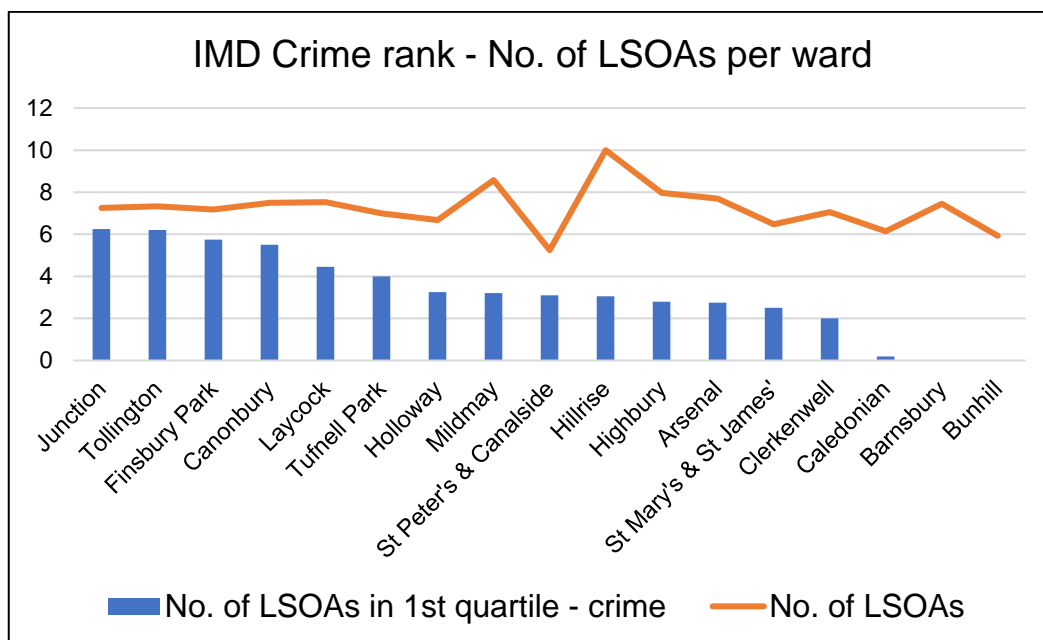


Figure 48. Number of LSOAs in top 20% most deprived for crime. Deprivation – Conclusions

H24. There are areas of deprivation throughout Islington with a concentration of LSOA areas in the top 20% nationally located in the North and North East of the borough.

H25. Deprivation is a supporting factor in the proposal to include the new wards of Finsbury Park and Hillrise in the selective licensing designation.

8.9 PART I: Migration

11. To show that migration is a relevant criterion for the designation of a selective licensing scheme, it must be demonstrated that the area has recently experienced or is experiencing an influx of migration into it.⁶³
12. Guidance suggests that migration refers to the movement of people from one area to another. It includes migration within a country and is not restricted to migration from overseas. Authorities should consider whether the area has experienced a significant increase in the size of the population over a brief period. In assessing this, the local housing authority should consider whether net migration into the designated area has increased the population of the area.
13. The guidance goes on to suggest a population increase of around 15% or more over a 12-month period would be indicative that the area has or is experiencing an elevated level of migration into it.
14. Table 42 shows the change in mid-year population estimates for each ward in 2018 and 2019.⁶⁴ Although there has been a population increase it was below the 15% threshold.

⁶³ The Selective Licensing of Houses (Additional Conditions)(England) Order 2015 - [Article 5 \(a\)](#)

⁶⁴Office for National Statistics.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/lowersuperoutputareamidyearpopulationestimates>

Table 42. Population increase 2018-2019 by ward.

| Ward | 2018 mid-year population estimate | 2019 mid-year population estimate | % Increase |
|---------------|-----------------------------------|-----------------------------------|-------------|
| Holloway | 19047 | 19787 | 3.9% |
| Bunhill | 18992 | 19660 | 3.5% |
| St Peter's | 13967 | 14298 | 2.4% |
| Finsbury Park | 17813 | 18208 | 2.2% |
| St Mary's | 13301 | 13553 | 1.9% |
| Caledonian | 16148 | 16390 | 1.5% |
| Highbury West | 18782 | 19041 | 1.4% |
| Highbury East | 13471 | 13646 | 1.3% |
| Clerkenwell | 13257 | 13386 | 1.0% |
| Canonbury | 12969 | 13064 | 0.7% |
| Junction | 13063 | 13150 | 0.7% |
| Barnsbury | 13752 | 13836 | 0.6% |
| Mildmay | 14449 | 14476 | 0.2% |
| St George's | 12968 | 12980 | 0.1% |
| Tollington | 14429 | 14422 | -0.1% |
| Hillrise | 12734 | 12570 | -1.3% |
| TOTAL | 239,142 | 242,467 | 1.4% |

15. To aid understanding of population growth and migration the following data has been analyse over a longer timeframe
- Population growth
 - Internal migration
 - International migration
 - New National Insurance Registrations (NINos) for overseas migrants.
 - New GP Registrations for overseas migrants

Population growth

16. The population of Islington increased by 30,000 (17%) between 2001 and 2011, to 206,100 residents.
17. The ONS 2018 estimate for the population of Islington in 2021 is 247,717. This is an increase of approximately 20.2% (41,617 people) since 2011.
18. ONS population growth estimates for the 10 years from 2018 to 2028 for England is 4.9%. 8.7% growth is projected for Islington in same period and 8.4% for London as a whole.

19. Looking at the mid-year population estimates over a five-year period between 2014 and 2019⁶⁵ by ward, Table 43 shows that Bunhill ward had the highest percentage increase over 5 years of 19.7%, with six wards above the average population increase for Islington.

Table 43. Percentage change in population estimates 2014-2019.

| Ward | Mid 2019 | Mid 2014 | Increase | % increase |
|---------------|----------------|----------------|---------------|------------|
| Bunhill | 19,660 | 16,431 | 3,229 | 19.7 |
| Holloway | 19,787 | 16,924 | 2,863 | 16.9 |
| Finsbury Park | 18,208 | 15,745 | 2,463 | 15.6 |
| Highbury West | 19,041 | 16,684 | 2,357 | 14.1 |
| St Peter's | 14,298 | 12,539 | 1,759 | 14.0 |
| Barnsbury | 13,836 | 12,480 | 1,356 | 10.9 |
| St Mary's | 13,553 | 12,538 | 1,015 | 8.1 |
| Highbury East | 13,646 | 12,643 | 1,003 | 7.9 |
| Clerkenwell | 13,386 | 12,445 | 941 | 7.6 |
| Junction | 13,150 | 12,433 | 717 | 5.8 |
| Caledonian | 16,390 | 15,551 | 839 | 5.4 |
| Tollington | 14,422 | 13,723 | 699 | 5.1 |
| Mildmay | 14,476 | 13,791 | 685 | 5.0 |
| Hillrise | 12,570 | 12,087 | 483 | 4.0 |
| St George's | 12,980 | 12,614 | 366 | 2.9 |
| Canonbury | 13,064 | 12,777 | 287 | 2.2 |
| TOTAL | 242,467 | 221,405 | 21,062 | 9.5 |

110. Figure 49 shows the population growth trend based upon mid-year estimates for Islington from 1999 to 2019.

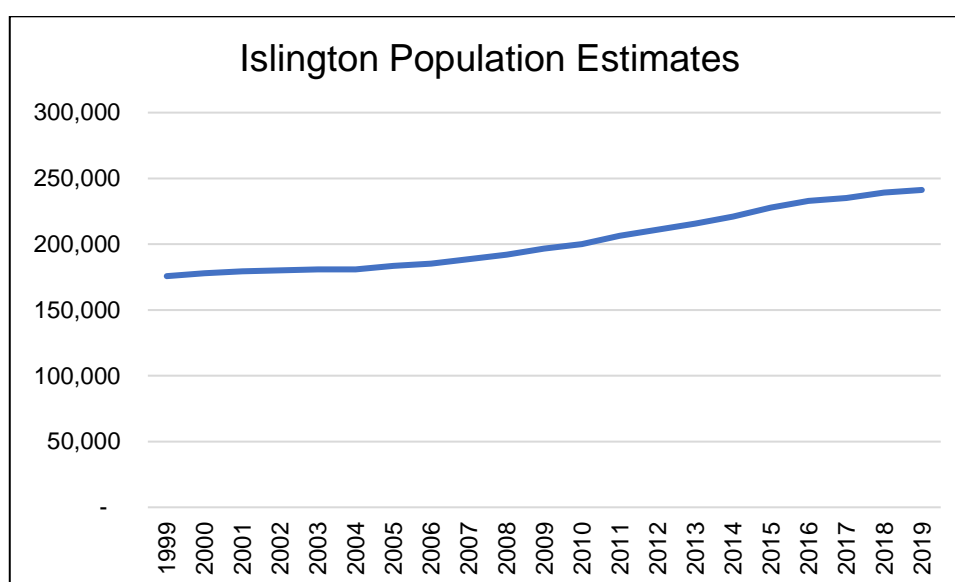


Figure 49. Population growth in Islington 1999-2019.

⁶⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>

Internal migration

- I11. Figure 50 shows the internal migration between other parts of the UK and Islington between 2009 and 2019. Inflow and outflow both increased over the 10 year period but outflow was greater than inflow which meant that there was net negative internal migration in Islington.

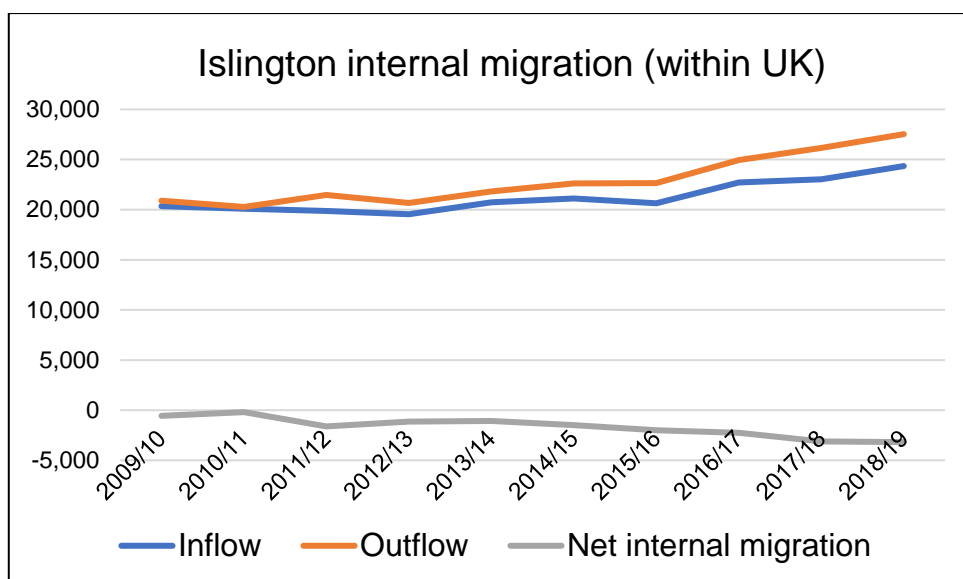


Figure 50. Internal migration (within UK) to Islington 2009-2019.

Overseas migration

- I12. In 2020, 35% of Islington residents were born outside of the United Kingdom compared to 35% in London as a whole and 14.8% in England⁶⁶. According to the ONS, in 2019, Islington had the 5th highest net international migration of people in London and is more than twice the average for London.⁶⁷
- I13. Figure 51 shows the Islington population estimates for non-UK born people from 2010 to 2019, showing a steady increase from below 60,000 to over 80,000. Although there was a dip in 2017 to 2018, numbers have increased sharply in 2019 showing there is significant international migration into Islington.⁶⁸

⁶⁶ ONS. Population of the UK by country of birth and nationality

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/populationoftheunitedkingdombycountryofbirthandnationality>

⁶⁷ <https://data.london.gov.uk/dataset/migration-indicators>

⁶⁸ ONS. <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom>

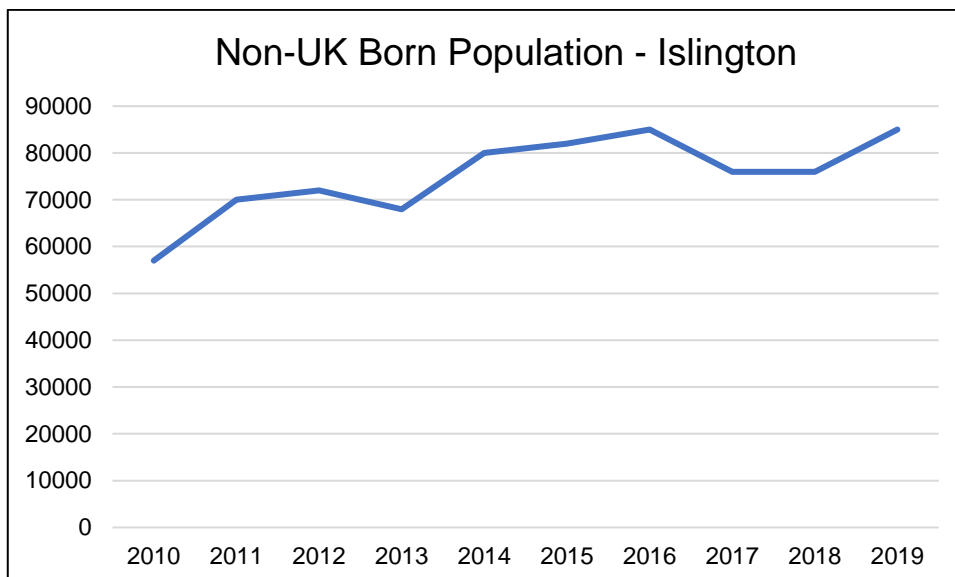


Figure 51. Non-UK born population estimates for Islington 2010-2019.

I14. Figure 52 shows the inflows and outflows and net international migration for Islington over the period 2010-2019.

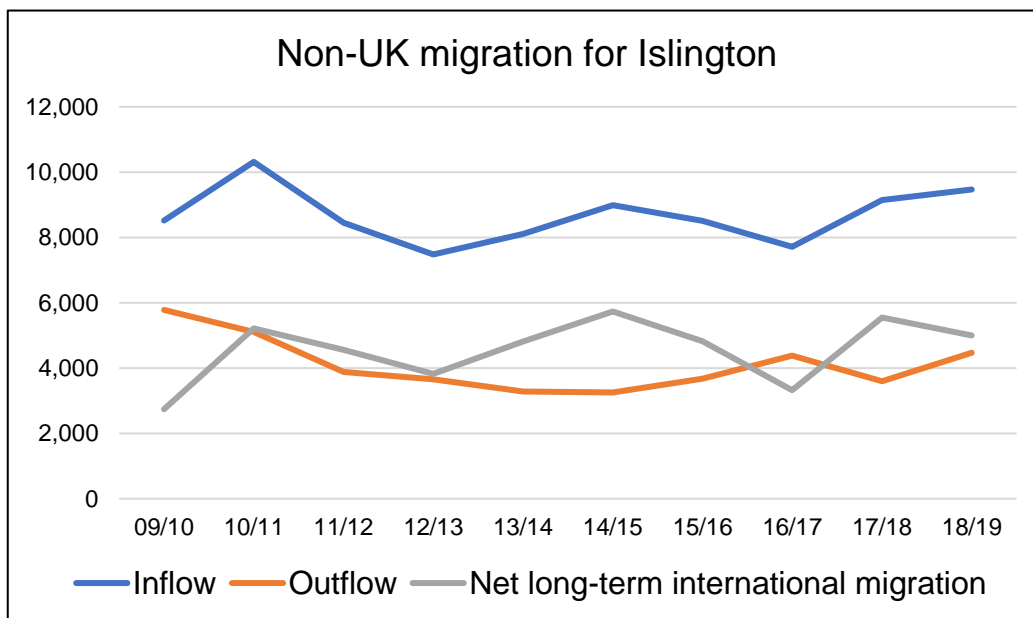


Figure 52. Non-UK international migration for Islington 2010-2019.

New National Insurance Registrations (NINOs)

I15. A recognised indicator of migration is the increase in NINOs for overseas migrants.

I16. Figure 53 shows the NINOs registrations in Islington between 2010 and 2019.

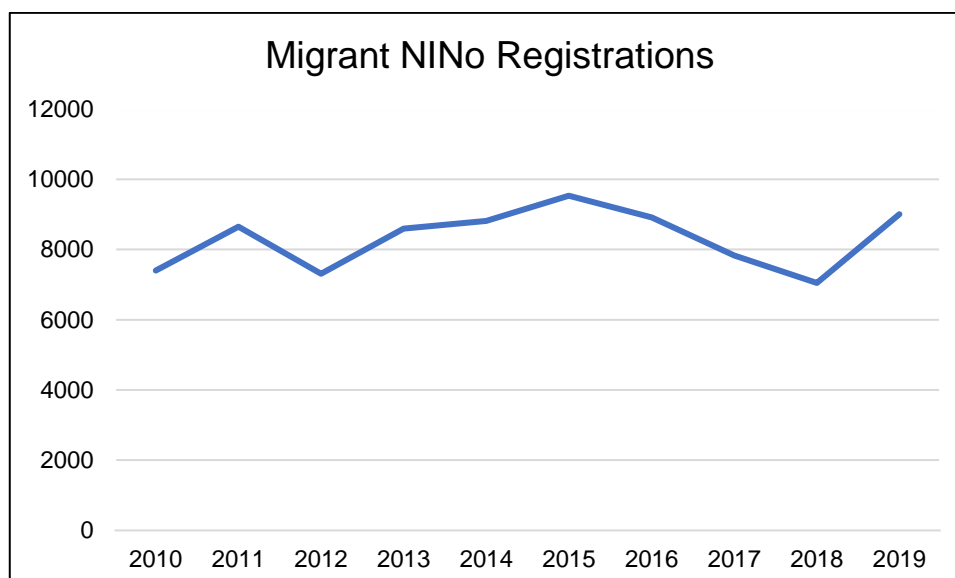


Figure 53. Migrant NINo registrations 2010-2019.

New GP registrations

117. Figure 54 the new migrant GP registrations over the same period. This shows a different picture to NINOs, in that there has been a steady increase over the same period, with the total in 2019 the highest ever in Islington at 9,739⁶⁹, the 13th highest in London and in increase of 5.6% from 2018 and almost 70% over the 10-year period.

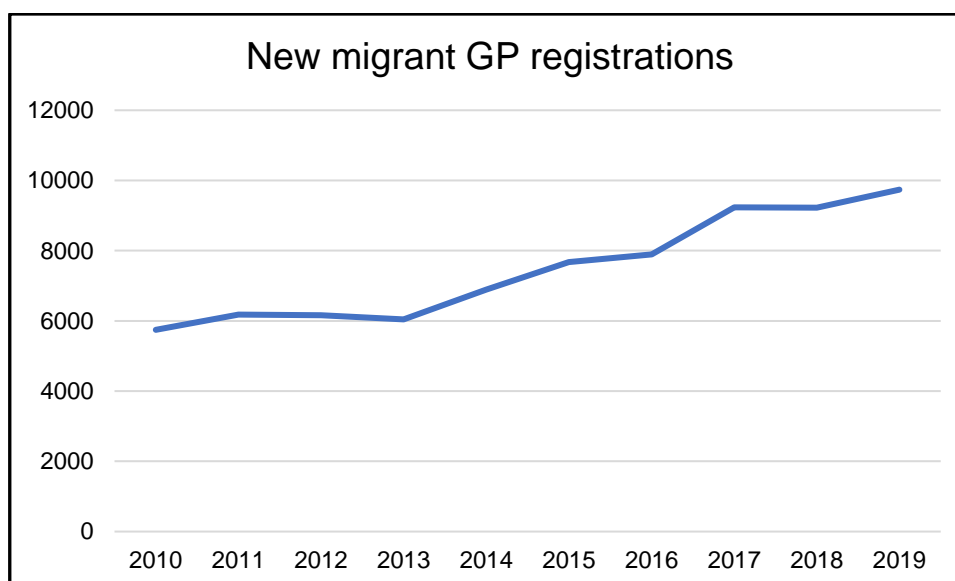


Figure 54. New migrant GP registrations for Islington 2010-2019.

Migration – Conclusions

118. In summary, the existing **Holloway** and **Bunhill** wards show the highest level of population increase. The lack of ward level data does not allow for a more detailed analysis of correlation with other data on the PRS at ward level.

⁶⁹ <https://data.london.gov.uk/dataset/migration-indicators?resource=e138b1ab-f276-422d-8695-03f3e2500790>

- I19. Migration is not a criterion that has been selected to support the proposal to introduce selective licensing in the new wards of Finsbury Park, Hillrise and Tollington.

8.10 PART J: Low Housing Demand

- J1. To show that low housing demand is a relevant criterion for the designation of a selective licensing scheme, it must be demonstrated that the area is, or is likely to become, an area of low housing demand.⁷⁰
- J2. When deciding if an area is suffering from, or likely to become, an area of low housing demand, it is recommended that local housing authorities consider the following factors⁷¹:
- the value of residential premises in the area, in comparison to the value of similar premises in other areas which the authority considers to be comparable (whether in terms of type of housing, local amenities, availability of transport);
 - the turnover of occupiers of residential premises (in both rented and owner-occupied properties);
 - the number of residential premises which are available to buy or rent, and the length of time for which they remain unoccupied;
 - the general appearance of the locality and the number of boarded up shops and properties.
- J3. There is no evidence that the circumstances suggested in the guidance are an issue in London and so do not apply in Islington. Therefore, this criterion will not be considered further.

⁷⁰ Housing Act 2004 [Section 80\(3\)](#)

⁷¹ Department for Communities and Local Government. Selective licensing in the private rented sector A Guide for local authorities https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418551/150327_Guidance_on_selective_licensing_applications_FINAL_updated_isbn.pdf

8.11 PART K: Council or Secretary of State Approval

- K1. Islington Council has general approval to introduce a selective licensing scheme that covers less than 20% of properties in the private sector or less than 20% of the geographical area of the borough. Any scheme that exceeds these limits will require approval from the Secretary of State for Levelling Up, Housing & Communities.⁷²
- K2. Table 44 shows the numbers and percentage of the total PRS per new ward based upon the 2021 PRS analysis. The proposed wards that will be covered by the selective licensing designation are in red and in total they cover 18.26% of the PRS properties in the borough.

Table 44. Number and percentage of PRS per new ward.

| New ward | Estimated number of PRS properties | PRS % of borough total |
|--------------------------|------------------------------------|------------------------|
| Caledonian | 2669 | 7.5% |
| Bunhill | 2523 | 7.1% |
| Finsbury Park (1) | 2489 | 7.0% |
| Arsenal | 2440 | 6.9% |
| Tollington (1) | 2404 | 6.7% |
| Clerkenwell | 2259 | 6.3% |
| Mildmay | 2135 | 6.0% |
| Highbury | 2061 | 5.8% |
| St Mary's & St James' | 2057 | 5.8% |
| St Peter's & Canalside | 2032 | 5.7% |
| Barnsbury | 2010 | 5.6% |
| Holloway | 2006 | 5.6% |
| Junction | 1844 | 5.2% |
| Tufnell Park | 1814 | 5.1% |
| Canonbury | 1695 | 4.8% |
| Hillrise (1) | 1617 | 4.5% |
| Laycock | 1587 | 4.5% |
| TOTAL | 35,642 | 100.00% |

- K3. Table 45 shows the area of the new wards in square kilometres. The proposed wards that will be covered by the selective licensing designation are in red and in total they cover 18% of the geographical area of the borough.

⁷² The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2015

Table 45. Area of new wards.

| Ward | Area in square km | Percentage of the borough |
|------------------------|-------------------|---------------------------|
| Highbury | 1.08 | 7.3% |
| Junction | 1.06 | 7.1% |
| Hillrise (1) | 1.01 | 6.8% |
| Clerkenwell | 0.93 | 6.3% |
| Mildmay | 0.90 | 6.1% |
| Barnsbury | 0.90 | 6.1% |
| Caledonian | 0.88 | 5.9% |
| Canonbury | 0.86 | 5.8% |
| Laycock | 0.86 | 5.8% |
| Tufnell Park | 0.84 | 5.7% |
| Bunhill | 0.84 | 5.7% |
| Finsbury Park (1) | 0.84 | 5.7% |
| Tollington (1) | 0.82 | 5.5% |
| Arsenal | 0.81 | 5.5% |
| Holloway | 0.78 | 5.3% |
| St Mary's & St James' | 0.75 | 5.1% |
| St Peter's & Canalside | 0.65 | 4.4% |
| TOTAL | 14.81 | |

- K4. The estimated total number of PRS properties in Islington is 35,645. The estimated number of PRS properties in the new wards of Finsbury Park, Tollington and Hillrise is 6510. The total percentage of the borough PRS in these three wards for the proposed designation is **18.26%**.

Table 46. Percentage of PRS in proposed designation.

| New ward | Estimated number of PRS properties | % of total PRS |
|-----------------|------------------------------------|----------------|
| Finsbury Park | 2489 | 7.0% |
| Hillrise | 1617 | 4.5% |
| Tollington | 2404 | 6.7% |
| Combined | 6510 | 18.3% |

- K5. Table 47 shows the geographical area of the new wards for the designation is **18.00%** of the total borough and so the proposed three new wards are not greater than 20% of the borough total.

Table 47. Area of proposed designation.

| New ward | Area in square km | Percentage of the borough |
|----------------------|--------------------------|----------------------------------|
| Finsbury Park | 0.84 | 5.67% |
| Hillrise | 1.01 | 6.82% |
| Tollington | 0.82 | 5.51% |
| TOTAL AREA | 2.66 | 18.00% |

- K6. The proposed designation therefore contains less than 20% of the borough's total PRS and is less than 20% of the total geographical area of the borough.

Percentage of the PRS – Conclusions

- K7. The proposed selective licensing designation for the new wards of Finsbury Park, Tollington and Hillrise under the poor property conditions criterion are below the 20% threshold which means that Secretary of State approval will not be required.

8.11 Part L: Aggregate analysis

- L1. Poor property conditions provided the clearest evidence to support selective licensing with deprivation, ASB and crime providing supporting evidence in several wards.
- L2. Having gathered the property data and assessed its relevance to the criteria for selective licensing, a methodology was devised to draw together all the relevant property condition data contained in Section 8
- L3. There was a total of 41 data sets relating to poor property conditions:
 - 27 were numerical data sets;
 - 14 were data sets expressed as a percentage of the PRS.
- L4. The numerical data sets are listed in Table 48 below.

Table 48. Numerical data sets for poor property conditions

| Number | Numerical category |
|--------|---|
| 1 | Total number of all property condition complaints |
| 2 | Number of unique addresses with property condition complaints |
| 3 | Total number of property condition complaints resulting in formal or informal action |
| 4 | Percentage of total property condition complaints requiring formal or informal action |
| 5 | Total number of property condition complaints requiring formal action |
| 6 | Percentage of total property condition complaints requiring formal action |
| 7 | Total number of all nuisance complaints |
| 8 | Number of unique addresses with nuisance complaints |
| 9 | Total number of nuisance complaints resulting in formal or informal action |
| 10 | Percentage of total nuisance complaints requiring formal or informal action |
| 11 | Total number of nuisance complaints requiring formal action |
| 12 | Percentage of total nuisance complaints requiring formal action |
| 13 | Total number of category 1 and category 2 hazards |
| 14 | Number of unique addresses with category 1 or category 2 hazards |
| 15 | Total number of category 1 hazards |
| 16 | Number of unique addresses with category 1 hazards |
| 17 | Total number of high category 2 hazards (bands D & E) |
| 18 | Number of unique addresses with high category 2 hazards |
| 19 | Average number of category 1 and category 2 hazards per address |
| 20 | Total number of interventions |
| 21 | Number of unique addresses with an intervention |
| 22 | Percentage of hazards with an intervention |
| 23 | Total number of notices served |
| 24 | Number of unique addresses with notices served |
| 25 | Total number of Housing Act notices served |
| 26 | Number of unique addresses with Housing Act notices served |
| 27 | Total number of notices served under the Environmental Protection Act and other legislation |

- L5. Each data set was scored for each ward using an index, where 1 equalled the borough average for that criterion. A ward which was average across all data sets would achieve a score of 27. Table 58 below shows the results with eight wards being above average.

Table 49. Combined index score for poor property numerical data sets.

| Ward | Total of all numerical indices |
|-----------------------------------|---------------------------------------|
| Finsbury Park | 57 |
| Tollington | 42 |
| Caledonian | 41 |
| Junction | 40 |
| Hillrise | 31 |
| Laycock | 29 |
| Arsenal | 29 |
| Tufnell Park | 27 |
| Holloway | 26 |
| Barnsbury | 21 |
| Mildmay | 20 |
| St Mary's & St James' | 18 |
| Highbury | 18 |
| Canonbury | 17 |
| St Peter's & Canalside | 16 |
| Bunhill | 16 |
| Clerkenwell | 14 |

- L6. Fourteen data sets were analysed and expressed as a percentage of the PRS in the ward. These are listed in table 59 below.

Table 50. Data sets expressed as a percentage of the PRS

| Number | Category |
|--------|---|
| 1 | Total number of property condition complaints as a % of the PRS in the ward |
| 2 | Number of unique addresses with property condition complaints as a % of the PRS |
| 3 | Number of property condition complaints with action required as a % of the PRS |
| 4 | Number of property condition complaints with formal action as a % of the PRS |
| 5 | Total number of nuisance complaints as a % of the PRS in the ward |
| 6 | Number of unique addresses with nuisance complaints as a % of the PRS |
| 7 | Number of nuisance complaints with action required as a % of the PRS |
| 8 | Number of nuisance complaints with formal action as a % of the PRS |
| 9 | Number of unique addresses with category 1 and category 2 hazards as a % of the PRS |
| 10 | Number of category 1 hazards as a % of the PRS |
| 11 | Number of high category 2 hazards as a % of the PRS |
| 12 | Number of unique addresses with an intervention as a % of the PRS |
| 13 | Number of unique addresses with notices served as % of the PRS |
| 14 | Number of unique addresses with Housing Act notices served as a % of the PRS |

- L7. Each data set was scored for each ward using an index, where 1 equalled the borough average for that criterion. A ward which was average across all data sets would achieve a score of 14. Table 60 below shows the results with eight wards being above average.

Table 51. Combined index score for poor property data expressed as a percentage of the PRS

| Ward | Total of all % of PRS Indices |
|------------------------|-------------------------------|
| Finsbury Park | 27 |
| Junction | 25 |
| Hillrise | 21 |
| Laycock | 20 |
| Tollington | 19 |
| Caledonian | 18 |
| Tufnell Park | 15 |
| Holloway | 14 |
| Arsenal | 12 |
| Barnsbury | 11 |
| Mildmay | 10 |
| Canonbury | 10 |
| Highbury | 9 |
| St Mary's & St James' | 9 |
| St Peter's & Canalside | 8 |
| Bunhill | 6 |
| Clerkenwell | 6 |

- L8. Having analysed the data for each ward both numerically and as a percentage of the PRS for that ward, seven wards were consistently ranked above average with Arsenal and Holloway below average in one of the two rankings.
- L9. The final analysis was to combine the index score for both numerical data and percentage data for each ward. With 41 data sets, an average ward would have total index score of 41. Table 61 below shows the results with nine wards being above average.

Table 52. Total index score for both numerical data and data expressed as a percentage of the PRS.

| Ward | Total Index |
|-----------------------------------|--------------------|
| Finsbury Park | 84 |
| Junction | 65 |
| Tollington | 62 |
| Caledonian | 59 |
| Hillrise | 52 |
| Laycock | 50 |
| Tufnell Park | 43 |
| Arsenal | 42 |
| Holloway | 41 |
| Barnsbury | 33 |
| Mildmay | 31 |
| Highbury | 28 |
| St Mary's & St James' | 28 |
| Canonbury | 27 |
| St Peter's & Canalside | 24 |
| Bunhill | 22 |
| Clerkenwell | 20 |

9 Links to other strategies

A Fairer Islington: Our Commitment 2018-22

- 9.1 Islington wants to ensure that all privately rented properties in the borough offer residents a choice of safe, quality and well managed accommodation. Our corporate vision was set out in the A Fairer Islington Our Commitment 2018-22.

“We have a clear vision to make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.”

Our priorities within the plan that are applicable to private sector housing include the following:

Delivering decent and genuinely affordable homes for all

- Increase the supply and choice of genuinely affordable homes
 - Make it easier for families to find a property that meets their needs, helping people to down-size when they no longer need a large property and supporting those in overcrowded conditions to move to a more suitable home
- Prevent homelessness and support rough sleepers
- Improve housing conditions for private tenants
 - Introduce a new landlord licensing scheme in Finsbury Park and Seven Sisters Road and investigate the feasibility of a borough wide landlord licensing scheme
 - Take action against rogue landlords and letting agents who treat tenants unfairly, and offer advice to private tenants

Creating a safe and cohesive borough for all

- Make sure fewer young people are victims or perpetrators of crime
- Reduce levels of crime and anti-social behaviour
 - Reduce the level of crime and ASB in partnership with the police and the local community
 - Maintain our anti-social behaviour hotline, working with the police and using tenant action to address local issues
- Keep consumers informed and safe
 - Use our licensing powers to take action against businesses who fail to follow the rules

Making Islington the best place for all young people to grow up

- Always keep children and young people safe and secure and reduce the number of children growing up in poverty
- Making Islington a welcoming and attractive borough and creating a healthy environment for all
- Keep the streets clean and promote recycling
- Ensuring our residents can lead healthy and independent lives
- Safeguard and protect older and vulnerable residents
- Help residents to live independently

Islington Strategic Plan 2021

9.2 The Islington Strategic Plan 2021⁷³ sets out a number of ambitions, one of which is:

“With a growing population and the price of housing continuing to far outweigh wages in London, ensuring access to good quality housing that is safe and genuinely affordable for everyone in Islington is an essential priority for us in creating a fairer future for our borough.”

One of the core components of this ambition is to stand up for private renters:

“We want to see a private sector that ensures safe and dignified living conditions for all by operating good standards of management and providing good quality, affordable accommodation. We will monitor standards and take action against rogue landlords and letting agents and any poorly performing housing associations and where appropriate, will work with the police to address criminal behaviour by landlords to stamp out exploitative behaviour, inequalities and protect the rights of our residents.”

Homelessness and Rough Sleeping Strategy

9.3 The Council also has a stand-alone strategy for homelessness⁷³. Chapter 8 addresses the private rented sector and states:

The private rented sector (PRS) can be seen as both a source of homelessness, but also as a potential resolution. This can be evidenced consistently as one in four homelessness acceptances in Islington are of households that have become homeless because of the loss of private rented sector accommodation.

Private landlords are also increasingly less inclined to lease properties to councils or let to tenants at LHA rates as they have access to alternative tenants willing to pay higher rents.⁷⁴

However, as there are insufficient numbers of homes becoming available for social rent, the PRS must be utilised, both as temporary and settled accommodation. To that end we work with landlords to:

- improve their professionalism through advice, assistance and education, through the London Landlord Accreditation Scheme;
- find suitable and affordable accommodation, rather than bed and breakfast accommodation, through lease agreements with private landlords;
- invest in energy efficiency and renewable technologies, to support vulnerable households facing fuel poverty in conjunction with the council’s SHINE network.

The joint work with landlords noted above runs alongside activities conducted by the council’s Residential Environmental Health team to raise standards of accommodation through licensing and other enforcement methods.

⁷³ <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/housing/businessplanning/strategies/20202021/20201214homelessnessandroughsleepingstrategy201923.pdf>

⁷⁴DCLG, Homelessness Roundtable, 4 December 2012

The Safer Islington Partnership (SIP)

- 9.4 The partnership co-ordinates work on crime reduction and community safety in Islington. The council is a lead authority in this partnership along with the Police, London Fire Brigade, health sector, probation services and representatives from voluntary, community, faith, and business sectors.

The current priorities for the Partnership are:

- youth crime
- hate crime
- anti-social behaviour
- violence against women and girls.

- 9.5 Every year the partnership carries out a strategic assessment of crime in the borough, this is then used to determine local priorities

Appendix 1 – List of streets included in the proposed selective licensing scheme.

This is a list of streets that would be included in the proposed licensing scheme but as some streets extend into other wards or neighbouring borough not all properties in these streets will be covered by the proposals.

Should the council decide to implement the scheme more detailed information on property addresses in scope will be provided.

| FINSBURY PARK |
|----------------------|
| ALLERTON WALK |
| AMBLER ROAD |
| ANDOVER ROAD |
| ANNETTE ROAD |
| ARTHUR ROAD |
| ATHELSTANE MEWS |
| AXMINSTER ROAD |
| BERKELEY WALK |
| BERRIMAN ROAD |
| BESANT WALK |
| BIGGERSTAFF STREET |
| BIRNAM ROAD |
| BLACKSTOCK MEWS |
| BLACKSTOCK ROAD |
| BOLTON WALK |
| BOWMAN'S MEWS |
| BRISSET WAY |
| CAREW CLOSE |
| CARVILLE STREET |
| CHAPMAN PLACE |
| CHARTERIS ROAD |
| CITY NORTH PLACE |
| CLIFTON TERRACE |
| COLERIDGE ROAD |
| CORKER WALK |
| DURHAM ROAD |
| EBURNE ROAD |
| FALCONER WALK |
| FONTHILL MEWS |
| FONTHILL ROAD |
| GOODWIN STREET |
| HANMER WALK |
| HATLEY ROAD |
| HEATHER CLOSE |

| |
|----------------------|
| HERCULES PLACE |
| HERTSLET ROAD |
| HOLLOWAY ROAD |
| HORNSEY ROAD |
| ISLEDON ROAD |
| KINLOCH STREET |
| LAZAR WALK |
| LENNOX ROAD |
| MAYTON STREET |
| MEDINA GROVE |
| MEDINA ROAD |
| MINGARD WALK |
| MORAY MEWS |
| MORAY ROAD |
| MORRIS PLACE |
| NEWINGTON BARROW WAY |
| PAKEMAN STREET |
| PARKSIDE CRESCENT |
| PLAYFORD ROAD |
| PLIMSOLL ROAD |
| POOLES PARK |
| PRAH ROAD |
| RAY WALK |
| RIXON STREET |
| ROCK STREET |
| RODEN STREET |
| ROMILLY ROAD |
| ROTH WALK |
| SALTERTON ROAD |
| SELDEN WALK |
| SEVEN SISTERS ROAD |
| SIDINGS MEWS |
| SIX ACRES ESTATE |
| SONDERBURG ROAD |
| ST THOMAS'S ROAD |
| STACEY STREET |
| STATION PLACE |
| STEVE BIKO ROAD |
| STROUD GREEN ROAD |
| THANE VILLAS |
| THANE WORKS |
| THISTLEWOOD CLOSE |
| TILTMAN PLACE |
| TODDS WALK |

| |
|---------------------|
| TOLLINGTON PARK |
| TOLLINGTON PLACE |
| TOLLINGTON ROAD |
| TOMLINS WALK |
| TRAVERS ROAD |
| VAL MCKENZIE AVENUE |
| VIVIAN COMMA CLOSE |
| WELLS TERRACE |
| WESLEY CLOSE |
| WHADCOAT STREET |
| WOODBIDGE CLOSE |
| WOODFALL ROAD |
| WYCOMBE MEWS |
| YONGE PARK |

HILLRISE

| |
|----------------------|
| AMY GRIFFITHS COURT |
| ARCHWAY ROAD |
| ASHBROOK ROAD |
| ASHLEY ROAD |
| ASHMOUNT ROAD |
| BARBARA RUDOLF COURT |
| BARNFIELD CLOSE |
| BEACHCROFT WAY |
| BEAUMONT RISE |
| BLYTHWOOD ROAD |
| BUXTON ROAD |
| BYWORTH WALK |
| CALVERLEY GROVE |
| CARDINALS WAY |
| CHARLES STREET |
| CHEVERTON ROAD |
| COACH YARD MEWS |
| CORNWALLIS ROAD |
| COURTAULD ROAD |
| CRESSIDA ROAD |
| CROMARTIE ROAD |
| CROUCH HILL |
| DAISY DOBBINGS WALK |
| DICKENSON ROAD |
| DRESDEN ROAD |
| DUNCOMBE ROAD |
| EDITH CAVELL CLOSE |

| |
|------------------------|
| EDITH TURBEVILLE COURT |
| ELLA ROAD |
| EMILY HEARTWELL COURT |
| FAIRBRIDGE ROAD |
| FITZWARREN GARDENS |
| FLORENCE CANTWELL WALK |
| GLADSMUIR ROAD |
| GRENVILLE MEWS |
| GRENVILLE ROAD |
| GRESLEY ROAD |
| HANLEY ROAD |
| HANNAY LANE |
| HARBERTON ROAD |
| HATCHARD ROAD |
| HAZELLVILLE ROAD |
| HEATHVILLE ROAD |
| HENFIELD CLOSE |
| HETTY REES COURT |
| HIGHCROFT ROAD |
| HIGHLANDS CLOSE |
| HILLRISE ROAD |
| HOLLAND WALK |
| HOLLOWAY ROAD |
| HOLLY PARK |
| HORNSEY LANE |
| HORNSEY RISE |
| HORNSEY RISE GARDENS |
| HORNSEY ROAD |
| JESSIE BLYTHE LANE |
| JUTLAND CLOSE |
| LAMBTON MEWS |
| LAMBTON ROAD |
| LOTUS MEWS |
| LOUISE AUMONIER WALK |
| LYSANDER GROVE |
| LYSANDER MEWS |
| MARIE LLOYD GARDENS |
| MARIE STOPES COURT |
| MARLBOROUGH ROAD |
| MARY KINGSLEY COURT |
| MIRANDA ROAD |
| MIRIAM PRICE COURT |
| MOUNT VIEW ROAD |
| MOWATT CLOSE |

| |
|--------------------|
| MULKERN ROAD |
| NEW ORLEANS WALK |
| NICHOLAY ROAD |
| NUGENT ROAD |
| NYTON CLOSE |
| ORMOND ROAD |
| PAROLLES ROAD |
| PARTINGTON CLOSE |
| PILGRIMS WAY |
| PORTER SQUARE |
| PROSPERO ROAD |
| SANDERS WAY |
| SCHOLEFIELD ROAD |
| SHAFTESBURY ROAD |
| SPEARS ROAD |
| ST JOHN'S WAY |
| SUNNYSIDE ROAD |
| SUSSEX WAY |
| TRAYS HILL CLOSE |
| TRINDER GARDENS |
| TRINDER ROAD |
| TURPIN WAY |
| VICARAGE PATH |
| WARLTERSVILLE ROAD |
| WESTACOTT CLOSE |
| WHITEHALL PARK |
| ZOFFANY STREET |

TOLLINGTON

| |
|------------------|
| ALEXANDER ROAD |
| ALMINGTON STREET |
| AXMINSTER ROAD |
| BAVARIA ROAD |
| BIRNAM ROAD |
| BLENHEIM COURT |
| BOWMAN'S MEWS |
| BOWMAN'S PLACE |
| BRACEY MEWS |
| BRACEY STREET |
| BRYETT ROAD |
| CHAPEL WAY |
| CHRISTIE COURT |
| CORBYN STREET |

| |
|-------------------------|
| CORNWALLIS ROAD |
| CORNWALLIS SQUARE |
| CROUCH HILL |
| DAVENANT ROAD |
| DULAS STREET |
| EBURNE ROAD |
| EMPIRE SQUARE |
| EVERLEIGH STREET |
| EVERSHOT ROAD |
| FONTHILL ROAD |
| FORTNAM ROAD |
| HANLEY GARDENS |
| HANLEY ROAD |
| HERCULES PLACE |
| HERCULES STREET |
| HERCULES YARD |
| HOLBROOKE COURT |
| HOLLOWAY ROAD |
| HORNSEY ROAD |
| INGLEBY ROAD |
| JAPAN CRESCENT |
| KINGSDOWN ROAD |
| KIVER ROAD |
| LANDSEER ROAD |
| LEEDS PLACE |
| MANOR GARDENS |
| MARLBOROUGH ROAD |
| MARLBOROUGH YARD |
| MARRIOTT ROAD |
| MITFORD ROAD |
| MONTEM STREET |
| MOUNT PLEASANT CRESCENT |
| MOUNT PLEASANT MEWS |
| ORMOND ROAD |
| PAVILLION MEWS |
| PINE GROVE |
| POMOJA LANE |
| REGINA ROAD |
| RICKTHORNE ROAD |
| RINGMER GARDENS |
| ROADS PLACE |
| SALTERTON ROAD |
| SEARLE PLACE |
| SEVEN SISTERS ROAD |

| |
|-------------------|
| SPARSHOLT ROAD |
| STANLEY TERRACE |
| STONENEST STREET |
| STROUD GREEN ROAD |
| SUSSEX CLOSE |
| SUSSEX WAY |
| THORPEDALE ROAD |
| TOLLINGTON PARK |
| TOLLINGTON PLACE |
| TOLLINGTON WAY |
| TUFNELL PARK ROAD |
| TURLE ROAD |
| TURLEWRAY CLOSE |
| VINCENT PARADE |
| WEDMORE GARDENS |
| WHEWELL ROAD |
| WINDSOR ROAD |
| WRAY CRESCENT |

Appendix 2 – Schedule of proposed licence fees

Selective Property Licence Fees

1 April 2021 to 31 March 2023

The application fee is in two parts:

Part 1: covers the cost of processing the application

Part 2: covers the cost of running and enforcing the licensing scheme

Standard Application Fees

Part 1: £450.00 per house

Part 2: £350.00 per house

Total: £800 per house

Reduced Rate Application Fees

(For applicants accredited under the London Landlords Accreditation Scheme, or other recognised accreditation scheme.)

Part 1: £410.00 per house

Part 2: £315.00 per house

Total: £725.00 per house



Appendix 3 – Proposed property licence conditions

Selective Licence Conditions

Housing Act 2004 Section 90

1 Permitted occupation

- 1.1 A new resident must not be permitted to occupy the house or any part of the house if that occupation exceeds the following maximum permitted number of persons for the property:
- one household or
 - two households of no more than two people
- 1.2 A new resident means a person who was not an occupier of the house at the date of the issue of the licence

2 Tenancy management

- 2.1 Provide all tenants with a written statement of the terms on which they occupy the property and the arrangements in place to deal with repairs and emergency issues.
- 2.2 Protect any deposit taken under an assured short-hold tenancy by placing it in a statutory tenancy deposit scheme. Provide the tenant the prescribed information about the scheme being used at the time the deposit is taken.
- 2.3 Obtain references from prospective tenants before entering into any tenancy agreement with them. No new occupants shall be allowed to occupy the accommodation if they are unable to provide a reference. The licence holder must retain all references obtained for occupants for the duration of this licence.
- 2.4 Provide suitable emergency (including out of hours response) and management arrangements.
- 2.5 When requested provide the council, in writing, details of the tenancy management arrangements that have been, or are to be, made to prevent or reduce anti-social behaviour by persons occupying or visiting the property.
- 2.6 Conduct an inspection of the property at least every 6 months to identify any problems relating to the condition and management of the property and check that common parts and external areas are free from waste. Keep a written record of the inspection specifying the:

- name of person conducting inspection
- date and time of inspection
- issues identified
- action taken

2.7 Take prompt action to address anti-social behaviour arising from the conduct of occupants or visitors to the property by complying with the following requirements:

- On receipt of a complaint of anti-social behaviour concerning a visitor or occupant of the property do not ignore nor fail to take action and take appropriate action to monitor the allegation.
- Inform the occupants in writing about any allegation of anti-social behaviour within 14 days of receipt and consequences of its continuation.
- Where the anti-social behaviour continues after 28 days from receipt of the complaint, visit the property within 7 days and issue a warning letter advising the behaviour is not acceptable, that they are responsible for the conduct of all occupants and visitors, the impact on the local community and the consequences of its continuation.
- Take formal steps under the written statement of terms for occupation if after 14 days of giving the warning letter the anti-social behaviour is unresolved.
- Notify the appropriate authorities of anti-social behaviour suspected to involve criminal activity.
- Keep a written record of any meetings, telephone conversations or investigations and copies of correspondence regarding anti-social behaviour for 3 years.
- Attend any case conferences or multi-agency meetings arranged by the council or police upon request.

3 Property management

3.1 Take appropriate steps to remedy any disrepair reported by occupants.

3.2 Take immediate action to deal with any pest problem or infestation at the property and ensure that a treatment programme is carried out to eradicate the pest infestation. Records shall be kept of such treatment programmes.

3.3 Any gas installation and gas appliance shall be kept in a safe condition, at all times. All work on gas appliances must be carried out by a Gas Safe registered engineer.

3.4. A current valid gas safety certificate from a Gas Safe registered engineer obtained within the last 12 months, or a Gas Safe Installation Certificate if the boiler was installed in the last 12 months shall be provided to the council annually.

3.5 The electrical installation in the property shall be maintained in a safe condition. Where requested by the council provide, within 28 days, an electrical installation report issued by a competent person within the last 5 years.

- 3.6 All electrical appliances made available by the licence holder shall be kept in a safe condition. Where requested by the council provide, within 28 days, a written declaration to the safety of such appliances.
- 3.7 All furniture made available by the licence holder shall be kept in a safe condition. Where requested by the council, provide within 28 days, a written declaration as to the safety such furniture. All upholstered furniture, covers, fillings, cushions and pillows shall comply with current fire safety requirements.
- 3.8 A smoke alarm shall be installed on each storey of the house (which includes half-landings) on which there is a room used wholly or partly as living accommodation.
- 3.9 Each smoke alarm installed in any room in the house shall be kept in proper working order.
- 3.10 Where requested by the council, provide a written declaration confirming the positioning and condition of smoke alarms.
- 3.11 Install a carbon monoxide alarm in any room in the property used wholly or partly as living accommodation (including a hall, landing bathroom or WC) and contains a solid fuel burning combustion appliance.
- 3.12 Any carbon monoxide alarm installed in any room in the property shall be kept in proper working order.
- 3.13 Where requested by the council provide written statement, within 28 days, confirming the positioning and condition of any carbon monoxide alarms.
- 3.14 Provide and maintain adequate security measures to prevent access by intruders and ensure that:
- The access to the property, such as locks, latches and entry systems are maintained in good working order, at all times.
 - The front door of the property is fitted with a mortice lock (thumb turn) or equivalent, to a five-lever security level.
 - Where window locks are fitted, the keys are provided to the relevant occupants.
 - Where a burglar alarm is fitted to the property, the occupants are informed in writing about the circumstances under which the code for the alarm can be changed and are given details on how this can be arranged.
 - Where previous occupants have not returned keys, the relevant locks will be changed prior to new occupants moving in.
- 3.15 Within 7 days of the start of occupation provide written information to all occupants on the arrangements for the storage and disposal of household recycling and waste. This information must be provided in a clear and easy to understand format which occupants can refer to.
- 3.16 No refuse shall be kept in the front or rear garden other than in an approved storage container for that purpose. Old furniture, bedding, or rubbish from the property must not be left immediately outside the property nor on private land.

- 3.17 Carry out regular checks to ensure that occupants are complying with the storage, recycling and disposal of waste arrangements and warn occupants if they, or their visitors, are not using the waste and recycling facilities provided or are leaving waste outside the property.
- 3.18 Provide adequate facilities for storing, recycling, and disposing waste for the number of occupants so that bags or loose refuse or waste for recycling are not stored outside the property. Ensure that these containers provide for the adequate separation of recyclable, garden (where applicable), food and residual waste.

4 Documents to be supplied to tenants

- 4.1 Either provide to all tenants at the start of the tenancy or display in the common parts of the property:
- a copy of the licence to which these conditions apply
 - a notice with the name, address and emergency contact number of the licence holder or managing agent for the property
 - a copy of the current gas safety certificate
 - a copy of a valid electrical inspection condition report
 - a copy of a valid portable appliance test certificate (PAT) covering all electrical appliances supplied within the property
 - a copy of a valid test certificate for the automatic fire alarm system (dated within the last 12 months)
 - a copy of a valid test certificate for the emergency lighting system (dated within the last 12 months)
 - an appropriate Energy Performance Certificate (EPC)

Note: Landlords cannot grant a new tenancy after 1 April 2018 where the EPC is band F or G. After 1 April 2020 landlords must not continue to let a let property where the EPC is band F or G.

5 Financial management

- 5.1 No person other than the licence holder or the agent named on the licence may collect or receive rental monies from the occupants of the property. The licence holder and/or agent may pass on the rental monies to any third parties as required.
- 5.2 Where rents are collected or received from occupants, payment must be recorded and all occupants receive a receipt for the payment, unless the occupant is an assured short-hold tenant and pays their rent via bank standing order or direct debit. The licence holder must keep a copy of all such records and receipts and must provide the council with a copy of the same within 28 days of any request to inspect them.

6 Material change of circumstances

- 6.1 The licence holder must inform the authority within 21 working days of any material changes in their own circumstances and, within 21 days of becoming aware of them, of any known material change in the circumstances of any person managing or involved in the management of the property, such as details of:

- unspent convictions not previously disclosed to the authority that may be relevant to the licence holder or the property manager or the status of either of them as a 'fit and proper person,' including in particular, a conviction in respect of any offence involving fraud or dishonesty, violence, drugs, or any offence listed in Schedule 3 of the Sexual Offences Act 2003.
- a finding by a court or tribunal against the licence holder and/or the property manager that he or she has practiced unlawful discrimination.
- a contravention on the part of the licence holder or property manager relating to housing, public health, environmental health, or landlord and tenant law, which has led to civil or criminal proceedings and a judgment or finding being made against him or her.
- information about any property the licence holder or property manager owns or manages, or has owned or managed:
 - i. which has been made subject to a control order under section 379 of the Housing Act 1985, in the five years preceding the date of the application; or
 - ii. which has been the subject of any enforcement action described under Part 1 sections 5(2) or 7(2) of the Housing Act 2004, concerning category 1 and category 2 housing condition hazards; or
 - iii. in relation to which a local housing authority has either refused to grant a licence under Part 2 or 3 of the Housing Act 2004, or has revoked a licence; or
 - iv. which has been the subject of an interim or final management order under the Housing Act 2004.

7 General requirements

- 7.1 Where requested in writing provide written copies of any information or records required by these conditions to the council within 28 days of the date of the request.
- 7.2 Arrange for access to be granted at any reasonable time and must not obstruct council officers carrying out their statutory duties including the surveying of the property to ensure compliance with licence conditions and any relevant legislation.
- 7.3 When requested provide the council the names and numbers of individuals accommodated in the property.
- 7.4 When requested provide the council with a plan of the property showing the location and size of all rooms (in square meters), including kitchen, bathroom and WC facilities. The plan shall be provided to the council within 28 days on demand.
- 7.5 When requested provide the council within 28 days a copy of the tenancy agreement.
- 7.6 Inform the council of any change in ownership or management of the house.
- 7.7 Whilst any alteration or construction works are in progress, the work is carried out to ensure the safety to all persons occupying or visiting the premises.
- 7.8 Ensure that on completion of any works, the property shall be left in a clean and tidy condition and free from builders' debris.

8 Deviation from the licence conditions

- 8.1 Any landlord who wishes to provide accommodation that requires a licence but that does not meet the licence conditions may apply in writing for a deviation from the licence conditions. The request will be considered, and the landlord informed of the decision in writing.

Islington Council
Residential Environmental Health Team
222 Upper Street London N1 1XR
Phone: 020 7527 3205
Email: property.licensing@islington.gov.uk



Islington Together: for a more equal future

SELECTIVE LICENSING

Public consultation on new proposals for private rented housing licensing schemes.

Frequently asked questions (FAQs)

Consultation runs from 23 December 2022 to 27 March 2022

The consultation

What are we proposing?

Islington Council is now consulting on introducing a new selective licensing scheme for the licensing of privately rented accommodation to replace the existing Finsbury Park scheme, in the new wards¹ of Hillrise, Tollington and Finsbury Park.

Why are we consulting on the proposal?

The Housing Act 2004 provides for local authorities to designate discretionary licensing schemes for privately rented properties, either borough-wide, or in certain specified areas. The Act requires the council to undertake a public consultation on the proposals before the schemes are implemented.

Why is it important for us to do this?

Our research has shown that there are problems with the standard and management of privately rented properties, particularly in the northern half of the borough. Although there are many responsible landlords, there are also many who do not manage their properties well. The evidence gathered in our assessment of the private sector shows that the PRS in the selected wards has higher levels of poor property conditions than in other parts of the borough, as well as having the highest levels in at least two of the criteria of ASB, crime or deprivation. A high percentage of privately rented properties in these wards means that the council can have the biggest impact through a selective licensing scheme.

The proposed licensing schemes will enable the council to attach conditions to licences that will ensure that the private rented sector is improved, the health and safety of tenants is protected, and that anti-social behaviour and crime affecting neighbourhoods is reduced. This will bring about an improvement of the private rented sector in a way that dealing with complaints one by one doesn't achieve.

How can I find out more detail about the proposals?

Please see the full consultation document.

The consultation process

Who are you consulting with?

We will be consulting widely, with landlords, agents, tenants, residents, local businesses, regional and national landlord associations, the police, London Fire Brigade, neighbouring local authorities and all other stakeholders.

Will there be any public meetings about the proposals?

You can find out more at one of our consultation virtual drop-in sessions. Details of how you can join these will be available on our website at

www.islington.gov.uk/licensingconsultation

¹ New ward boundaries and names come into effect May 2022.

How can I respond to this consultation?

To respond to this consultation please go to the online questionnaire at: www.islington.gov.uk/licensingconsultation or if you cannot complete the questionnaire online, please contact us on 020 7527 3205 to request a paper copy of the questionnaire or another format.

If you have any questions about the consultation, or require this questionnaire in another format please contact us:

E: property.licensing@islington.gov.uk

T: 020 7527 3205

Copies of the consultation FAQs and questionnaire are also available at local libraries and 222, Upper Street, London N1 1XR.

When will the results of the consultation be published and where?

The consultation will close at midnight on Sunday 27 March 2022 and the results will be collated and published on Islington's website.

Who makes the decision to approve the scheme and if the decision is to go ahead, what's the earliest it could start?

The responses from the consultation will be considered by the Islington Council Executive, who will make a decision to either accept or reject the schemes. This should take place around June 2022, subject to the committee cycle.

If the decision is to go ahead with the schemes, then the earliest the existing selective licensing scheme for Finsbury Park will be revoked and the new scheme for the new Hillrise, Tollington and Finsbury Park wards could be expected to start, is likely to be September 2022.

Who can I contact if I have any queries about this consultation?

If you have any questions that are not answered by these questions and answers, please look at the full, detailed consultation document. This document contains all the evidence gathered and justification for the scheme in accordance with government guidance. If you have any further questions, please email your question to property.licensing@islington.gov.uk and we will provide a response.

Proposed selective licensing schemes

What is meant by 'new' wards and how do I know if my street is included?

In our proposals, we refer to 'new' wards. The Local Government Boundary Commission for England (LGBCE) has introduced changes that will take effect from the date of the council elections on 5th May 2022. See [LGBCE proposed ward boundaries](#). The changes bring about an increase in the number of wards to 17. The boundaries of all wards will change, although some only slightly.

As a guide, the new wards are approximately equivalent to the following:

| New ward name | Existing ward or wards |
|---------------|---|
| Hillrise | Hillrise plus parts of Junction and Tollington |
| Tollington | Most of Tollington plus part of Finsbury Park |
| Finsbury Park | Finsbury Park except western corner, plus part of Highbury West |

Why are you revoking the Finsbury Park selective licensing scheme when it only began in February 2021?

The boundary changes will make the existing designation both contradictory to the new boundaries and confusing for all concerned. It is the most appropriate course of action to revoke the existing scheme and to include the area it covers in the new proposed designations.

How would the new scheme work?

All private landlords with residential property within the proposed scope of the scheme would need to apply for a licence for each property they let. The licence would come with conditions that would require the landlord to meet certain standards. In order to become a licence holder, they must pass a fit and proper person test.

What does a “fit and proper person” mean?

The council will carry out checks to make sure that the person applying for a licence is a “fit and proper person”. In deciding whether someone is “fit and proper”, the council must take into account, amongst other matters:

- a) Any offences involving fraud or other dishonesty, or violence or drugs, or any offence listed in Schedule 3 to the Sexual Offences Act 2003.
- b) Any unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in, or in connection with the carrying on of any business.
- c) Any contravention of any provision of the law relating to housing or of landlord and tenant law.
- d) Any person involved in the management of the property has sufficient level of competence to be so involved.
- e) Any person involved in the management of the house is a fit and proper person to be so involved.

The council can also decide if a person is not “fit and proper” as a result of association with other persons who would not be considered “fit and proper” where this would affect the management of a licensed property.

My property already has a licence under the Finsbury Park scheme. What will happen to that licence when the existing scheme is revoked?

Licences issued under the existing Finsbury Park scheme will remain in force for the period stated on the licence and landlords will not need to reapply for a licence. Following expiry of a licence and should a selective licensing scheme still continue to be in operation, an application for a licence renewal must be made.

Will my property be inspected by the Council?

Selective licensing does not require the mandatory inspection of every property. Inspection will be risk-based. Tenants who consider there are possible disrepair issues in their rented property will be able to contact the Residential Environmental Health Team and discuss their concerns. If there are grounds for an inspection, then we will liaise with both the landlord and tenant to arrange the inspection.

What will happen if I do not apply for a licence?

It is a criminal offence to operate without a licence in a designated area and could result in the landlord/owner being prosecuted. On conviction the landlord/owner could face an unlimited fine and any rent collected during the unlicensed period could be reclaimed by either the tenant or the council. A Civil Penalty Notice of up to £30,000 is an alternative sanction available to the local authority.

No offence is committed however if there is a genuine outstanding application for a licence on record or a Temporary Exemption Notice (TEN) is in force.

Is VAT payable on the licence fee?

No, VAT is not payable on licence fees.

Who is responsible for paying the licence fee?

The applicant, who may be the property owner, landlord or their agent, will be responsible for paying the licence fee for each property.

Is the council using licensing fees to raise money?

The fees charged will cover the costs associated with running the licensing scheme.

Will the licence fees be a disincentive for landlords and drive them out of the rental market?

The proposed fee for a licence is affordable, as it is only a small proportion of the overall rental income from a property over a period of five years. We believe that irresponsible landlords who do not keep their properties in good condition and do not manage them properly might decide to sell, in order to avoid licensing. This will however, open up their properties to people that will manage them well. Licensing will improve the image of the sector as a whole and will help encourage responsible landlords to invest in Islington.

Will the fees just be passed on to tenants through rent increases?

For a selective licence for a single family home it will be £800. This equates to £3.50 per week respectively for each five-year licence. We anticipate that this cost can be easily absorbed as part of the business model for landlords. Rents are generally market driven and do not tend to be influenced by licensing costs. Local housing market areas tend to cross borough boundaries and several of Islington's neighbours have already introduced discretionary licensing schemes and although the likelihood is low, any impact of such schemes on rent costs is likely to have already impacted Islington. We are not aware of any issues with rent increases due to licensing fees in the existing Finsbury Park scheme.

How long will the licence last?

In general, the council will aim to grant licences for the maximum term (5 years). There may be instances in which there are justifiable concerns with either:

- the condition of the property
- the management or the management arrangements
- or with the conduct (past or present) of a landlord or his associates which, whilst not leading to a conclusion that they fail the fit and proper person test, are significant enough to warrant granting a licence for a shorter term.

In every other case, the council will consider granting licences for five years, unless there are good reasons not to do so.

Following expiry of a licence and should a selective licensing scheme still continue to be in operation, a decision will be made on the standard of management of the property and the property relicensed accordingly for another five years or other period deemed appropriate. All licences continue for the term granted even when this extends beyond the life of the scheme.

I have a house in multiple occupation (HMO) in the proposed area, will it need a licence under the new scheme?

HMOs occupied by three or more people who are not a single household are generally covered by either the council's borough-wide additional licensing scheme, or the mandatory HMO licensing for larger HMOs. If not already licenced, landlords of HMOs anywhere in Islington should apply for an HMO licence and not a selective licence under these proposals. If you have an HMO licence you do not need a selective licence for the same property. Houses or flats that are occupied by just two people who do not form a single household will come within scope of selective licensing.

Aren't these conditions overly burdensome for landlords?

Many of the conditions are already mandatory for landlords and others we consider to be best practice in property management.

What happens if a landlord breaches the licence conditions?

If there are continued or serious breaches, they could be prosecuted with unlimited fines for each condition breach. Where appropriate they will be supported and given advice on how to comply with the conditions, a plan and timeframe for doing so.

A Civil Penalty Notice of up to £30,000 is an alternative sanction available to the council. A breach of licence conditions could also lead to the revocation of the licence and unless a suitable alternative licence holder could be found, the council may take over the management of the property by issuing an Interim Management Order (IMO).

What will the council do to support landlords under its proposed schemes?

The council intends to enhance its good working relationship with responsible private sector landlords as part of the proposed licensing schemes.

Specific support measures will include:

- A reduced licensing fee for properties where the landlord is accredited by the London Landlord Accreditation Scheme (LLAS), or another recognised accreditation scheme.
- A five-year licence for properties that do not raise significant concerns regarding the condition or management of them.
- Advice will be provided to landlords in relation to the licence standards.

What is an accredited landlord?

Islington actively promotes the London Landlord Accreditation Scheme (LLAS) and Accreditation and Training for Landlords and Agents Scheme (ATLAS). This is a voluntary scheme where landlords undergo training and sign up to a Code of Conduct which requires certain standards of management and maintenance. LLAS and ATLAS is a valuable scheme for engaging with well-meaning landlords. It provides support and imparts the knowledge necessary for them to run their businesses effectively, comply with the law, and provide safe, decent quality homes. There are also other recognised landlord accreditation schemes. Details can be found at <https://www.anuk.org.uk/schemes-near-you> .

Why don't you just use existing powers to deal with bad landlords?

We already do a number of things to improve the management of private rented properties and to tackle crime and anti-social behaviour in the borough. We will continue to use all our existing powers and work closely with other agencies. However, licensing will help us take a more proactive, targeted approach. We will have a dedicated, self-financed team in place to deal with service requests and complaints about properties within the scope of the schemes.

What is the existing selective licensing scheme in Islington?

Since 1 February 2021, a selective licensing scheme has been in place in the existing Finsbury Park ward. This scheme is in place for a period of 5 years and is due to expire after 31st January 2026. This designation applies to all houses and flats located within the existing Finsbury Park ward and rented to either:

- A single person
- Two people sharing (regardless of their relationship to one another)
- Any number of persons forming a single household (family).

What have you learnt from the existing selective licensing scheme in Finsbury Park and the borough-wide additional licensing scheme?

These schemes only came into effect in February 2021 and so it is too early to draw any conclusions. However, the lessons learned from the operation of the previous additional licensing scheme in Caledonian Road and Holloway Road were taken into account in drawing up our proposals for these schemes.

Why are you introducing other selective licensing schemes when you only previously designated Finsbury Park ward?

Although the evidence supported the introduction of the scheme, Finsbury Park was initially selected for designation as a pilot, before considering introduction of a scheme in further wards. The evidence we have gathered this time supports the case for designation of the additional wards now proposed. The systems we have

now put in place for the Finsbury Park scheme can readily be scaled up to deal with a greater number of properties in scope.

My property is in the existing Finsbury Park scheme but will be in another ward once the new boundaries are introduced. What will this mean?

Any property already licenced or subject to selective licensing under the existing scheme that won't be in the new Finsbury Park ward will fall into the new Tollington ward. As the new Tollington ward will be included in the proposed new scheme, then these properties will still fall within scope of selective licensing.

My property is not in the existing Finsbury Park scheme but will be within the new Finsbury Park ward boundary after the changes. What will this mean?

Some streets in the existing Highbury West ward will come under the new Finsbury Park ward after the changes, these streets will come within the scope of the proposed new scheme for Hillrise, Tollington and Finsbury Park.

Will all properties in these wards have to be licensed?

The following properties/circumstances do not require a licence:

- Owners who reside in a property they own as their main residence (owner-occupiers)
- Homes let to tenants of registered housing providers (housing associations)
- Those places specifically excluded from the legislation such as care homes, etc
- Student accommodation directly managed by educational institutions, e.g. halls of residence (but not those where students have tenancies with private landlords)
- HMOs that require licensing through Islington's additional or mandatory HMO licensing schemes
- Homes subject to management orders and prohibition orders
- Households that act as host families for foreign students studying for a short period
- Homes with lodgers

Full details of all exemptions are set out in [The Selective Licensing of Houses \(Specified Exemptions\) \(England\) Order 2006](#)

What evidence do you have that selective licensing will help?

In a great number of local authority areas, selective licensing has proved to have had a substantial impact on landlord and agent behaviour and improved their engagement and relationship with them.

I'm a tenant of a property within the designated area for selective licensing. How will it affect me?

Selective Licensing requires landlords to adhere to a number of conditions as part of their licence. Officers from Islington Council may inspect the property to ensure the conditions are complied with, it is in a satisfactory condition and that any hazards present are appropriately addressed by your landlord. This provides you with the

reassurance that checks have been carried out to ensure that the property is of a suitable standard and suitable for occupation.

I'm not a tenant but I do live in the areas proposed for designation so how would it affect me?

Selective licensing aims to ensure that privately rented properties in your area are being properly managed and will enable the council to take enforcement action against a wider range of properties, where necessary. The additional controls will assist in addressing issues such as property condition or anti-social behaviour and should result in benefits to all residents, businesses and visitors to the local area.

Implementation of the schemes

When will these schemes come into effect?

The council will make a designation, on a date to be determined, after the consultation concludes. The designation will state that the schemes will commence three months later.

Selective Licensing

Response to Consultation

Background

Islington Council's Residential Licensing team has undertaken a public consultation on proposals for a new selective licensing scheme. Respondents were asked to consider the proposals laid out in the Full Consultation Document and summarised in the Summary Consultation Document.

The proposed scheme would, in essence, require landlords and lettings agents to hold licences for all rented properties in the new wards of Finsbury Park, Hillrise and Tollington. Currently, only the old ward of Finsbury Park is subject to selective licensing. In all other wards a licence is only required for Houses of Multiple Occupation (HMOs).

We would like to thank respondents who took the time to share their views, all of which have been carefully considered in the drafting of this response. This document will set out the consultation process, the key points raised by respondents and the council's response.

The consultation process

Process

Islington Council launched a public consultation on its proposed selective licensing scheme, in accordance with requirements in The Housing Act 2004, and sought to gather local views on the proposals, including the proposed licensing conditions, fees, and alternatives that the council could consider.

The consultation ran for just over 13 weeks and ran from 23 December 2021 and closed on 27 March 2022, and well exceeded the minimum consultation period of 10 weeks. The consultation was circulated to key stakeholders including landlords, tenants, local faith groups via letters and emails, advertised through council communication channels and published on the Islington Council website.

The consultation mainly took the form of an online, sixteen question survey, including an open final question. Respondents could also write in by email and letter. Alongside the consultation survey, Islington published a Full Consultation Document, a Summary Consultation Document and a set of FAQs to fully outline the proposed scheme, the evidence and the justification for the scheme. Islington also held three online information sessions, at which officers were present to answer questions and record concerns raised. Although well-advertised, these were not well attended.

Breakdown of responses-key points

Thank you to everyone that took the time to complete the survey and contact us directly. We received a total of 68 responses to the survey as set out in Figure 1, and two separate written responses from landlord organisations, which along with the final open question, are discussed separately. Respondents were asked to complete questions based on whether they were a landlord or a tenant, so some questions are only answered by one particular group only. Some questions allowed respondents to choose more than one answer.

It has to be said that the consultation wasn't well responded to, despite a well-structured press and social media campaign, and letters/emails to the affected stakeholders. This could be due to the fact that the existing property licensing scheme has ensured that stakeholders are much more aware of property licensing as a concept and are accepting of the proposals compared with when the council first consulted on the existing scheme.



Figure 1: Respondent by type

One important finding was that the response from landlords and managing agents was significantly higher than any other group and accounted for over half of the respondents combined (54%). This has meant that the results of this consultation are skewed by the over representation of this group.

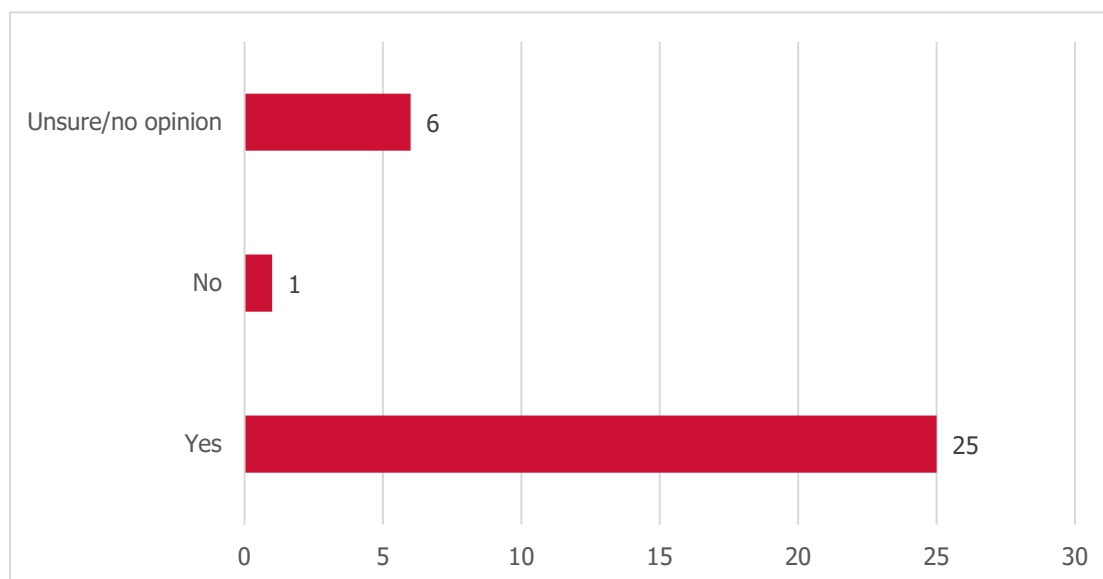


Figure 2: Is there a link between housing and poor health?

Most tenants who answered the question (78.1%) agreed that there is a link between poor housing and health (Figure 3).

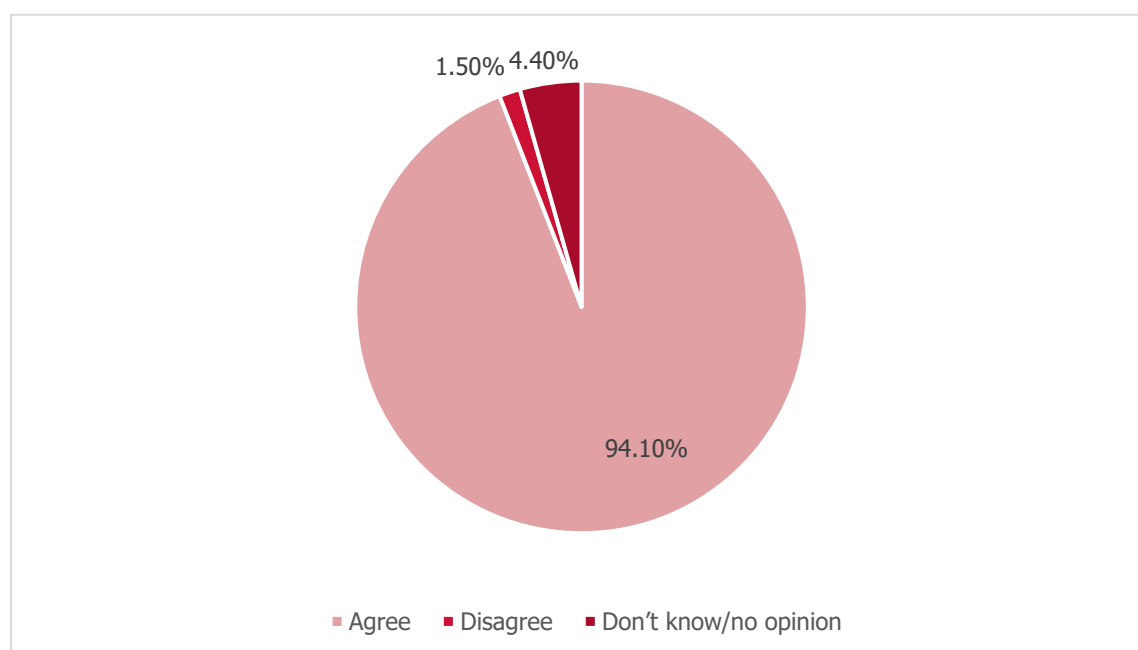


Figure 3: Should landlords and managing agents manage their properties responsibly?

Despite the different types of respondents (landlords, tenants, owner occupiers etc.), there was overwhelming agreement (94.1%) that landlords and managing agents should manage rented properties responsibly (Figure 2).

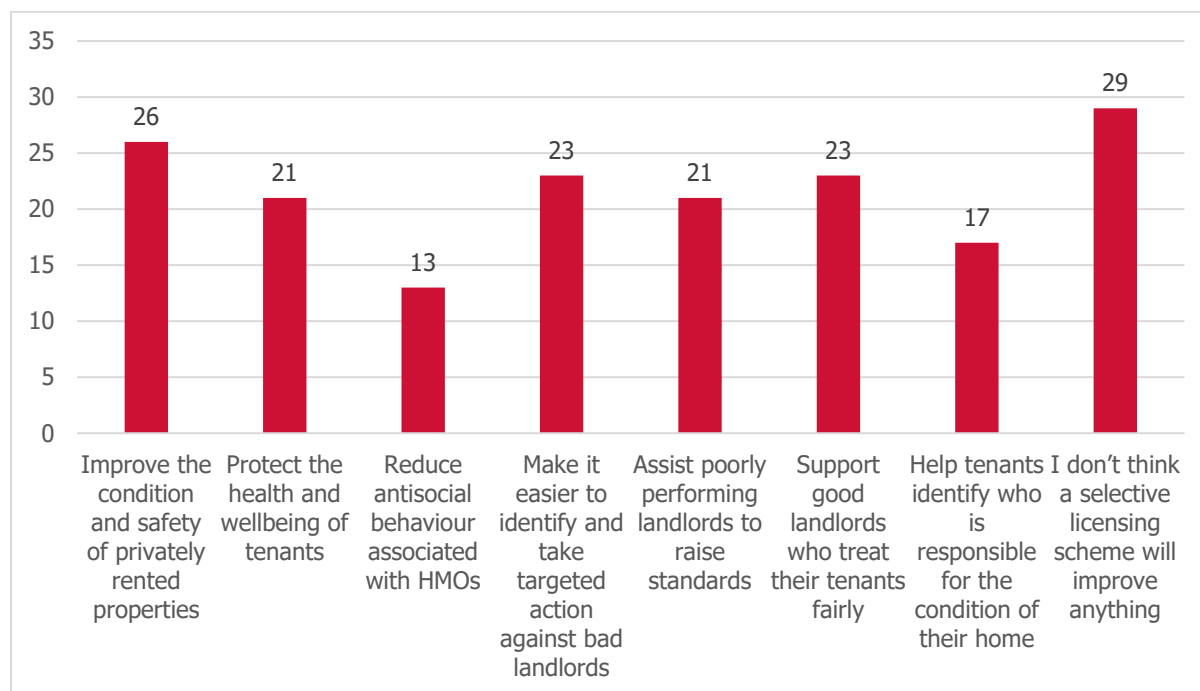


Figure 4: Which of the following issues do you think a Selective Licensing Scheme should address?

Figure 4 shows the responses to the question about issues the scheme should address. Respondents were asked to tick as many that applied. There was strong support for the scheme to improve the condition and safety of properties (47.3%); Protect the health and wellbeing of tenants (38.2%); Reduce antisocial behaviour (23.6%); Make it easier to identify and take targeted action against bad landlords (41.8%). This was balanced with support for assisting poorly performing landlords to raise standards (38.2%); supporting good landlords who treat their tenants fairly (41.8%); helping tenants identify who is responsible for the condition of their home (30.9%), and a slightly larger response for the scheme not improving anything at all (52.7%).

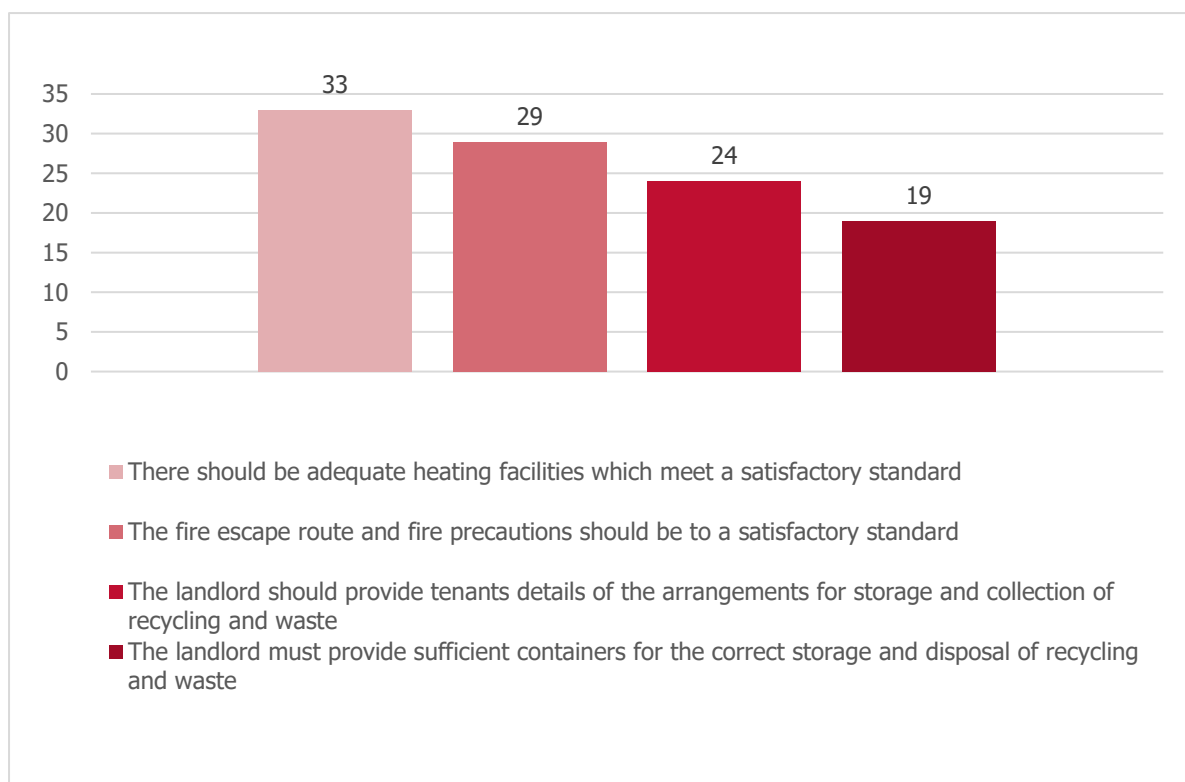


Figure 5: Opinion on proposed licence conditions

As noted in Figure 5, most respondents thought that adequate heating (33) and satisfactory fire precautions (29) should be on the licence conditions with adequate waste receptacles scoring less (19).

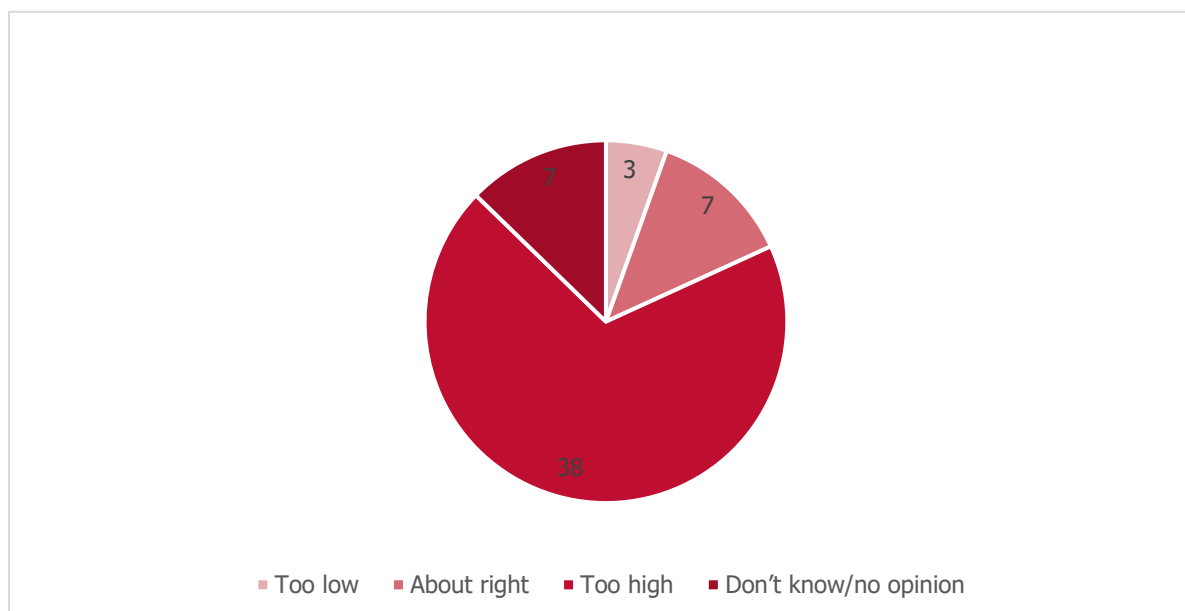


Figure 6: Licence fee

Unsurprisingly, most landlords overwhelmingly (69.1%) thought that the proposed licence fee was too high (Figure 6)

Table 1: Opinion on the proposed scheme by stakeholder type

| | Private Landlord or Managing Agent with properties in the new Finsbury Park, Tollington and Hillrise wards | Private Landlord or Managing Agent with properties elsewhere in Islington | Private Tenant living in the new Finsbury Park, Tollington and Hillrise wards | Private Tenant living elsewhere in Islington | Owner occupier or other resident in Islington | Interested voluntary, community or faith sector organisation (not a landlord) | Other, please specify |
|----------------------------|--|---|---|--|---|---|-----------------------|
| Strongly agree | 0.0% | 5.0% | 40.0% | 33.3% | 33.3% | 50.0% | 20.0% |
| Agree | 7.1% | 15.0% | 40.0% | 33.3% | 0.0% | 50.0% | 0.0% |
| Neither agree nor disagree | 21.4% | 10.0% | 0.0% | 16.7% | 33.3% | 0.0% | 0.0% |
| Disagree | 7.1% | 10.0% | 0.0% | 0.0% | 0.0% | 0.0% | 20.0% |
| Strongly disagree | 64.3% | 60.0% | 20.0% | 16.0% | 33.3% | 0.0% | 60.0% |

Table 1 shows the breakdown of opinion about the proposed scheme by the stakeholder type. Unsurprisingly landlords are overwhelmingly not in favour of the scheme, 64.3% and 60% for landlords within the proposed new wards and elsewhere in Islington, respectively. It was also interesting to note that owner occupiers were split equally between strongly agreeing (33.3%), neither agreeing or disagreeing (33.3%) or strongly disagreeing (33.3%). Overwhelming, interested voluntary, community or faith sector organisations that were not landlords, either strongly agreed (50%) or agreed (50%). When considered alongside tenants in the proposed scheme or elsewhere in the borough their combined strongly agreed and agreed responses (80%) and (66.6%) respectively, this supports the wider opinion that the proposed scheme will be well received by those that need it most: tenants.

Issues raised by respondents

The key issues raised in the open question survey responses, along with the two separate written responses are detailed below, alongside Islington Council's response. This was an important part of the survey and we welcomed those individual responses. They have been grouped, for ease of reply.

Issue 1: Respondents expressed concern that the cost of a licence could lead to increased rents and, alongside increased service charges, could potentially mean being a landlord financially unviable. Some were concerned that the scheme penalises good landlords and should get 'bad landlords' to pay for the scheme.

LBI Response: The cost of a selective licence for a single-family home (or two individual sharers) will be £800. This equates to £14.00 per month for the term of the five-year licence. We anticipate that this cost can be easily absorbed as part of the business model for landlords. Rents are generally market driven and do not tend to be influenced by licensing costs. Local housing market areas tend to cross borough boundaries and several of Islington's neighbours have already introduced discretionary licensing schemes and although the likelihood is low, any impact of such schemes on rent costs is likely to have already impacted Islington. We are not aware of any issues with rent increases due to licensing fees in the existing Finsbury Park scheme.

Issue 2: Several questions were asked about how the council intends to use the licence fee, whether the fee will contribute towards general council funding and how enforcement will be funded.

LBI Response: The fees charged will cover the costs associated with running the licensing scheme, including enforcement of the scheme for those landlords that have failed to apply for a licence.

Issue 3: Several respondents supported the proposed scheme, claiming that the scheme will help those who do not have the knowledge or confidence to report bad landlords and that lettings agencies and landlords have been getting away with low standards for too long.

LBI Response: Our property licensing scheme will create a clear and level playing field for the private rented sector across Islington. We believe that it should not be down to tenants to report issues with their home.

Issue 4: Some responses questioned the need for the scheme and whether there was evidence that licensing schemes lead to more enforcement action, particularly regarding the existing scheme in Finsbury Park. Several alternative courses of action were suggested:

- Focus on enforcing existing laws and tackle rogue landlords
- Solve the housing crisis by building more high-density flats, rather than licensing.

LBI Response: Whilst the Housing Act allows the council to improve dwellings, this largely relies upon a tenant making a complaint to the council, this not an efficient way to improve the housing conditions for renters and relies heavily on tenants reporting issues to us. The scheme will help us target resources on identifying landlords that evade licensing, and those that need to take action to bring their properties up to standard.

The council already use our existing enforcement powers to tackle rogue landlords, including the service of improvement notices, prohibition orders, civil penalty notices and taking prosecutions against the most serious cases of non-compliance. All enforcement action is proportionate and in line with our enforcement policy.

The council is actively building, as a priority, new council homes and to increase the supply of genuinely affordable, low carbon homes in Islington. More information about the council's housing strategy can be found here: [Housing Strategy 2021-2026 A Home For All \(islington.gov.uk\)](https://www.islington.gov.uk/housing-strategy-2021-2026)

Issue 5: Respondents called for the scheme to go further to address poor housing conditions. Suggestions included raising licence standards to beyond the legal minimum, stipulating a minimum water pressure in the licence conditions, widening the scheme to the entire borough and taking more action against converted buildings with illegally small units.

LBI Response: A careful balance must be found between raising standards and making the scheme impossible to comply with. As a local authority, we must be proportionate, reasonable, and fair in everything we do. Extending the property licensing schemes further than what is already proposed would mean that we would need sufficient evidence that a scheme is needed, and we would have to apply to the Secretary of State for Housing for the scheme to be approved, as combined with the current scheme, it will exceed the threshold set out in the legislation.

Issue 6: One respondent asked if a discount could be given to landlords who use an accredited agent.

LBI Response: The council are pleased to announce that there is a reduced fee for landlords that are accredited or managing agents that are accredited, providing they are either a licensee or a manager or the property.

Issue 7: One comment raised the issue of existing Finsbury Park selective licences and whether licence holders will need to reapply for their licence in 2026.

LBI Response: Existing licences will still be valid.

Issue 8: One landlord asked for more support around the requirements and is worries about the risk of accidental non-compliance.

LBI Response: A recognised accreditation scheme will often be a good option for a new or inexperienced landlord. Most accreditation schemes provide up to date training as part of the accreditation fee, and access to legal advice and support from other landlords. The licence fee for an accredited landlord is reduced to from £800 to £725.

Issue 9: Concerns were raised that the delineation between a selective and an additional HMO licence could discourage landlords from renting to couples and friends (e.g., a couple and a friend renting a two-bedroom property).

LBI Response: Thank you for highlighting this. We had not anticipated that this would be a problem. Currently, HMO licensing applies to the whole borough regardless of the size of the HMO. The cost of a license for a two-bedroom property (i.e., a couple and a friend sharing) is £288 per room (£576 in total). The cost of a selective licence in a two-bedroom property (i.e., not an HMO) is £800.

Issue 10: The NRLA made a general comment about waste management and the PRS and requested for there to be a free or low-cost scheme to remove bulky waste items left behind when tenants vacate at the end of a tenancy.

LBI Response: the council acknowledges most tenancy agreements require tenants to remove all belongings and waste when they vacate a property, and we would encourage landlords to explore options for recouping costs for waste disposal via the Tenancy Deposit Scheme (TDS) dispute resolution service. There are no current plans to reduce the cost of bulky waste collections for landlords.

Issue 11: the NRLA commented that landlords are unable to prevent ASB other than to evict a problematic tenant and that the council already has legislation to combat issues with waste disposal and ASB.

LBI Response: the council already utilises existing legislation to combat issues such as pest control, waste control management. Property licensing allows the council to target resources more efficiently. We would encourage landlords to undertake proper referencing to minimise the risk of renting their property to a problematic tenant.

Issue 12: the NRLA commented that if the scheme is approved, the council should consider providing an annual summary of outcomes to demonstrate improvements to tenants' and landlords' behaviour and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall.

LBI Response: a report is published at the conclusion of the scheme, but we will consider publishing an interim report.

Issue 13: safeagent state that there is no rationale for revoking the existing Finsbury Park selective licensing scheme and extending it and suggest a simple postcode checker to see if a property is within the scheme or not could eliminate the need to redeclare the Finsbury Park scheme once the new ward boundaries are in place.

LBI Response: once the new ward boundaries are introduced in May 2022, the existing designation for Finsbury Park will become contradictory and confusing. The designation as it stands refers to both a boundary marked on a map, which clearly shows the streets in scope, and the designation also states it applies to Finsbury Park ward, which will not have the same boundaries after May 2022. Revocation of the existing scheme and a new designation based on the new boundaries, incorporating the whole of the new Finsbury Park ward in addition to the proposed inclusion of Tollington and Hillrise will eliminate this contradiction and any confusion arising.

Issue 14: safeagent are concerned that there will be an adverse impact for those landlords who have currently applied for a licence in Finsbury Park ward and whose licences will expire before the new scheme finishes.

LBI Response: licences issued under the existing Finsbury Park scheme will remain in force for the period stated on the licence and landlords will not need to reapply for a new licence. Following expiry of a licence and should a selective licensing scheme still continue to be in operation, an application for a licence renewal must be made.

Issue 15: safeagent expressed concerns about the evidence base used to justify the scheme, including the use of a housing stock condition survey from 2008.

LBI Response: the council has undertaken an extensive review of all available data, both from within its own organisation and that more widely available, in relation to both the local, regional and national picture in reaching its conclusion that the proposed selective licensing scheme is the most appropriate course of action to take. Key data sources include 2011 Census data; Office for National Statistics (ONS); Greater London Authority (GLA Datastore); and Islington Council data. Data sets were created and aggregated to provide the worst wards in terms of the criteria specified. The council feels that there is sufficient data to support the scheme and considers that the wards of Tollington, Hillrise and Finsbury Park is where property licensing would have the greatest effect.

Issue 16: safeagent have requested that they be included in the list of accredited bodies, to enable more landlords to benefit from a discounted rate and would like to see a discount for landlords who apply for a licence early.

LBI Response: the council recognises several landlord accreditation bodies and would welcome landlords who are accredited by safeagent for the purposes of benefitting from the reduced license fee. The council considered discounts during the planning stage but opted for discounts for accredited bodies instead. We hope that this move will encourage more landlords to seek accreditation and access to the invaluable information and support services provided by accredited bodies.

Issue 17: safeagent have stated that it is important that the council implement an efficient and streamlined licence application processing system.

LBI Response: The council has invested in a public facing IT system designed to make the application process for landlords as quick and efficient as possible. The IT system provides automation of back-office systems which keeps our admin costs to a minimum and enables us to invest more income on inspection, monitoring, and enforcement. It also allows us to generate inspections and record our findings in one place.

Issue 18: safeagent made some recommendations to the licence conditions including some minor word changes and total removal of some conditions.

LBI Response: The council will carefully consider all comments and suggestions regarding rewording and removing the proposed licence conditions.

Issue 19: safeagent state that it is vital that the council maintains a well-resourced and effective enforcement team to take enforcement action against those landlords and agents that seek to evade the licensing scheme.

LBI Response: the new selective licensing scheme proposal includes a proportion of resources to enforce the scheme against those landlords that fail to apply for a licence. The council intends to train and recruiting more staff, paid for by the scheme, to process licence applications and inspect properties if the proposals go ahead

Appendices

Safeagent response

National Residents Landlord Association (NRLA) response

London Borough of Islington

27th March 2022

Dear Sir or Madam,

Property Licensing Proposal

The NRLA is an association following the merger of the National Landlords Association and the Residential Landlords Association. Our membership represents over 95,000 landlords and agents, by far the largest organisation in the sector. Members own and manage around 10% of the PRS, equating to half a million properties.

Thank you for the opportunity to respond to the above consultation to renew and introduce further selective licensing schemes in the borough. The NRLA objects to the relevance of property licensing schemes by local authorities. Although we sympathise with the aims of Islington Council, we believe that licensing does not align with the successful completion of these aims.

The NRLA seeks a fair legislative and regulatory environment for the private rented sector while ensuring landlords know their statutory rights and responsibilities.

Main Objections

Waste management in PRS properties

Often when tenants are nearing the end of their contract/tenancy and are moving out, they will dispose of excess household waste by a variety of methods. These include but are not limited to putting waste out on the street for the council to collect. This is in the hope of getting their deposit back and made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with many private rented properties need to consider a strategy for collecting excess waste at the end of a tenancy in place of selective licensing.

Suppose such a scheme is not already in place. Would the council consider a free/low-cost service for private landlords to remove numerous bunk items for when tenants vacate the property and not dispose of such waste beforehand?

Antisocial Behaviour

Landlords are usually not experienced in managing antisocial behaviour and do not have the professional capacity to resolve tenants' mental health issues or substance dependency. Suppose there are allegations about a tenant causing problems, and a landlord ends the tenancy. In that case, the landlord will have dispatched their obligations under the selective licensing scheme, even if the tenant suffers from any of the above issues.



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At the commencement of a tenancy, the landlord outlines the tenant's obligations concerning noise (and other matters such as waste disposal, compliance with relevant legislation, and consideration for surrounding neighbours). The landlord can manage a tenant only to the extent of their mutually signed and agreed contract for living in the property- not for a tenant's activities beyond this.

Islington Council has many existing enforcing powers that can rectify the identified problems as part of the council's housing strategy. These include:

1. Criminal Behaviour Orders
1. Crime Prevention Injunctions
1. Interim Management Orders
1. Empty Dwelling Management Orders
1. Improvement Notices (for homes that do not meet the Decent Homes Standard)
1. Litter Abatement Notices (Section 92 of the Environmental Protection Act 1990)
1. Fixed Penalty Notices or Confiscation of equipment (Sections 8 and 10 of the Noise Act 1996)
1. Directions regarding the disposal of waste (for example, Section 46 of the Environmental Protection Act 1990)
1. Notices to remove rubbish from land (Section 2-3 of the Prevention of Damage by Pests Act 1949)

Instead of further licensing, the council could utilise these enforcement powers and align them with the overall housing strategy the council wants for the PRS and the borough.

Conclusions

The NRLA believes that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. The sector is regulated, and enforcement is essential for keeping criminals who exploit landlords and tenants. An active enforcement policy that supports good landlords is crucial as it will remove those who exploit others and create a level playing field. It is essential to understand how the sector operates as landlords can often be victims of criminal activity and antisocial behaviour with their properties being exploited.

If the scheme is approved, the council should consider providing an annual summary of outcomes to demonstrate improvements to tenants' and landlords' behaviour and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall.

The NRLA has a shared interest with Islington Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of selective licensing is the most effective approach to achieve this aim both in the short term and long term.

Yours Sincerely,



Appendix C

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Samantha Watkin
Policy Officer
National Residential Landlords Association
Samantha.Watkin@nrla.org.uk



Proposed Selective Licensing Scheme in the London Borough of Islington

Safeagent Consultation Response

25 March 2022

An Introduction to safeagent

Safeagent is a not for profit accrediting organisation for lettings and management agents in the private rented sector. Safeagent (formally NALS) was established in 1999, by the Empty Homes Agency, with backing from the Royal Institution of Chartered Surveyors (RICS) the Association of Residential Lettings Agents (ARLA) and the National Association of Estate Agents (NAEA). Safeagent provides an overarching quality mark, easily recognised by consumers, with minimum entry requirements for agents.

Safeagent agents are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Agents must provide evidence that they continue to meet safeagent criteria on an annual basis to retain their licence. The scheme operates UK wide and has 1,500 firms with over 3,000 offices, including a number of agents within the London Borough of Islington.

Safeagent was recognised by the GLA as an approved body for the London Rental Standard. We are a recognised training provider under the Rent Smart Wales scheme and are also recognised by the Scottish Government in providing qualifications to meet the requirements of the Scottish Register.

We very much welcome the opportunity to contribute to this consultation exercise.

Overview

We understand that Islington Council is seeking to revoke the Finsbury Park selective licensing scheme that was implemented last year and designate a larger selective licensing scheme covering three council wards – Finsbury Park, Tollington and Hillrise.

In preparing this consultation response, we have carefully considered the consultation report and supporting documents published on the council's website.

Previous licensing schemes

We note that the council has operated a borough wide additional licensing scheme and a selective licensing scheme in Finsbury Park ward since February 2021.

The report says it is too early to draw any conclusions about the current selective licensing scheme that was implemented last year.

The report contains no information about the number of selective licence applications received, processed and approved over the last 12 months, nor how this compares to the number that were expected.

In the absence of any performance data about the current scheme and with the council acknowledging it is too early to draw any conclusions, we think this is the wrong time to revoke the current scheme and introduce a new larger scheme. There is no clear rationale for the council's decision.

We also have concerns about the 'passporting' arrangements between the old and the new schemes and the adverse impact this could have on landlords and agents who acted responsibly and promptly applied for licences under the current scheme. Selective licences already approved will expire in 2026/27. If a new scheme is implemented later this year, these landlords will have to reapply for a new licence, and pay another fee, in the final year of the new scheme. Effectively, the council's proposed course of action will penalise landlords and agents who have acted responsibly and already obtained a licence.

Whilst the council say this course of action is necessary to avoid the current scheme becoming outdated, inaccurate and confusing, we do not agree. As an example, Tower Hamlets Council recently renewed their selective licensing scheme based on pre-2014 ward boundaries. A change in ward boundaries does not require a new scheme. Any such concerns can be easily resolved by offering an online postcode checker to find out if a property requires licensing.

For the reasons outlined, we object to the council's proposed course of action. Instead, we would encourage the council to continue with the current selective licensing scheme for five years. The council could still consult on plans for a second selective licensing scheme that complements, rather than replaces, the current scheme.

Evidence base

Having reviewed the council's evidence base, we understand the new scheme is being introduced to address poor housing conditions, anti-social behaviour, crime and deprivation. We understand that poor housing conditions is the primary reason for scheme designation and the other factors are secondary reasons.

With poor housing conditions being the main driver, we are concerned that the council is basing their decision on a housing stock condition survey from 2008. We do not think it is reasonable to introduce a licensing scheme in 2022, based on stock condition information from 2008. The private rented sector, and Islington's housing stock, will have markedly changed in the last 14 years.

The council have also referred to property condition data from a 2018 survey of 114 single family properties in the Finsbury Park ward. That area is already covered by a selective licensing scheme. What we don't have is reliable, up to date information about housing conditions in the three proposed wards based on May-2022 ward boundaries.

Whilst service request data highlights Finsbury Park as the area of greatest concern, the six year data mapping is less compelling for the other two wards which feature in 4th and 7th place. There is also no data to show whether service requests

are trending up or down over the last six years, and it is unclear whether this data that has been published relates to the new or old ward boundaries.

Based on the published evidence base, we would encourage the council to pause and take stock. Part of the area is already subject to licensing. The council has the opportunity to demonstrate successful outcomes in that area. Meanwhile, an updated housing stock survey could be commissioned. In due course, this would put the council in a much stronger position to review options and decide on next steps.

Licensing fees

We recognise that the council need to charge a reasonable fee to cover the cost of administering and enforcing the licensing scheme.

It is important that the council implement an efficient and streamlined licence application processing system. This will help to minimise costs and keep fees at a reasonable level, thereby minimising upward pressure on the rent that is charged to tenants.

We understand the council intends to keep the same selective licensing fee that was set last year i.e., £800 for selective licenses.

We welcome the proposed £75 fee discount for accredited landlords. To encourage better management standards in the private rented sector, we request that the eligibility criteria are widened to include landlords who appoint an accredited safeagent member as the licence holder or designated manager. This will help to professionalise the lettings industry. As highlighted in the introduction, safeagent is a not for profit accrediting organisation for lettings and management agents. All our members are required to deliver defined standards of customer service, operate within strict client accounting standards, maintain a separate client bank account and be included in a Client Money Protection Scheme. Membership of safeagent can be easily verified by visiting our website: <https://safeagents.co.uk/find-an-agent/> or by contacting us by phone or email.

We would encourage the council to offer an early bird discount to landlords who apply before the start date of the scheme. To ensure landlords and agents have sufficient time to prepare such applications, we would request that the application process is launched and early bird discount offered for a three month period before the scheme comes into force.

We would also ask the council to consider what discounted rate, and streamlined licence application system, will be offered to the landlords of existing selectively licensed properties who must reapply for a new licence before the replacement licensing scheme ends.

Licence Conditions

We have studied the proposed list of standard licence conditions in the consultation report.

We have made some suggestions to help improve and fine tune the wording of the conditions. This in turn should help landlords and agents to understand and comply with the requirements.

Condition 2.2: The requirement is to provide tenants with prescribed information about any tenancy deposit within 30 days, and not at the time the deposit is taken.

Condition 2.3: From an equalities perspective, we would ask the council to clarify what happens if a prospective tenant is unable to provide a reference, and yet is reliant on the private rented sector for somewhere to live? Examples include care leavers, ex-offenders, asylum seekers and people fleeing domestic abuse. It is important that such groups retain a legal route to access affordable accommodation in private rented sector.

Condition 3.1: Selective licensing conditions can only relate to the management, use and occupation of the property. The Court of Appeal has confirmed that licence conditions cannot relate to property condition and contents (*Brown v Hyndburn Borough Council* [2018]). All conditions that contravene this requirement should be deleted or reworded to ensure compliance with case law.

Condition 3.2: We do not think immediate action is required to deal with every pest problem that occurs. This would suggest it requires an immediate out of hours response. We would encourage the council to consider a more appropriate timescale. For example, requiring steps to be taken within 14 days, or requiring action within an appropriate timescale having regard to the circumstances.

Condition 3.17: Whereas condition 2.6 requires inspections of the property and external areas every six months, this condition requires 'regular' checks, which could imply a different frequency. Consistency and clarity are important. One inspection every six months would seem reasonable for this purpose.

Condition 4.1: We think the list of documentation that must be given to the tenant is excessive. Whilst some are prescribed documents that must be given to the tenant, it is unusual for tenants in a single family property to be given fire alarm and emergency lighting test certificates and a PAT certificate. The requirement to maintain smoke alarms in good working order is already covered by other licence conditions. The note at the end of condition 4.1 is also incorrect. A property with an EPC F or G rating can still be occupied if the property is covered by a statutory exemption. Plus, licence conditions cannot relate to property condition.

Condition 7.4: We note that some councils ask for a floorplan as part of the licence application process and some do not. The council need to decide if this is a requirement. If it is made compulsory, the council should already have a copy on file in which case the condition serves no purpose.

Processing licence applications

We would ask the council to publish clear service standards setting out the timescale for processing and approving licence applications and to publish regular updates so that performance in this area can be monitored. In other boroughs, we regularly see licence approvals delayed by one year or more due to a backlog of work and inadequate resourcing.

Delivering effective enforcement

It is vital that the council maintains a well-resourced and effective enforcement team to take action against those landlords and agents that seek to evade the licensing scheme.

Without effective enforcement, new regulatory burdens will fall solely on those that apply for a licence whilst the rogue element of the market continue to evade the scheme and operate under the radar. This creates unfair competition for safeagent members who seek to comply with all their legal responsibilities. They are saddled with extra costs associated with the licence application process and compliance, whilst others evade the scheme completely.

Recognising the important role of letting agents

Letting agents have a critical role to play in effective management of the private rented sector. We would encourage the council to explore mechanisms for effective liaison with letting agents and to acknowledge the benefits of encouraging landlords to use regulated letting agents such as safeagent licensed firms.

Regulation of letting agents

To achieve better regulation of the private rented sector and improve consumer protection, it is important the council takes a holistic approach that extends far beyond the proposed licensing scheme.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant landlord and tenant fees, the redress scheme they belong to and whether they belong to a client money protection scheme, both in-store and on the company's website. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme. At safeagent we operate one of the six government approved client money protection schemes.

To assist councils in regulating the private rented sector and effectively utilising these enforcement powers, we developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the safeagent Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021. It can be downloaded free of charge from our website:

<https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-Effective-Enforcement-Toolkit-2021.pdf>

Should you wish to discuss any aspect of this consultation response, please do not hesitate to contact me. Can you also please confirm the outcome of the consultation exercise in due course.

Isobel Thomson
Chief Executive

Safeagent
Cheltenham Office Park
Hatherley Lane

Cheltenham
GL51 6SH

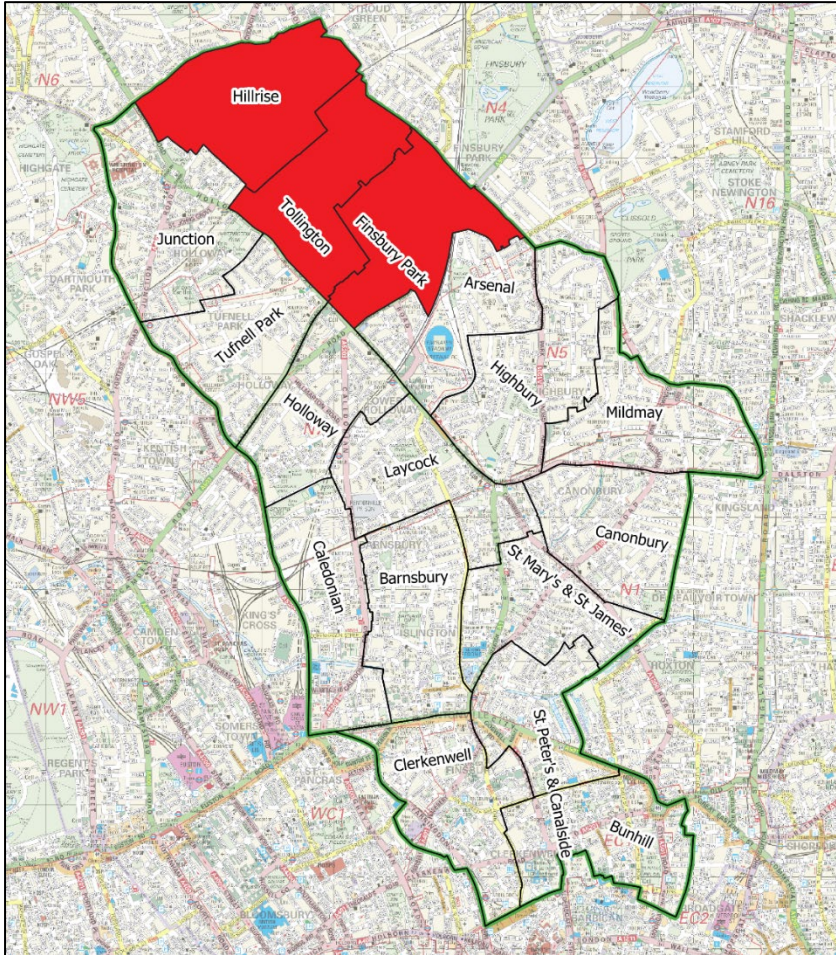
Tel: 01242 581712

Email: Isobel.Thomson@safeagents.co.uk

Website: <https://safeagents.co.uk>

Appendix D

Map showing the proposed selective licensing area





Selective Licence Conditions

Housing Act 2004 Section 90

1 Permitted Occupation

- 1.1 A new resident must not be permitted to occupy the house or any part of the house if that occupation exceeds the following maximum permitted number of persons for the property:
- one household or
 - two households of no more than two people
- 1.2 A new resident means a person who was not an occupier of the house at the date of the issue of the licence

2 Tenancy management

- 2.1 Provide all tenants with a written statement of the terms on which they occupy the property and the arrangements in place to deal with repairs and emergency issues.
- 2.2 Protect any deposit taken under an assured short-hold tenancy by placing it in a statutory tenancy deposit scheme. Provide the tenant the prescribed information about the scheme being used at the time the deposit is taken.
- 2.3 Obtain references from prospective tenants before entering into any tenancy agreement with them. No new occupants shall be allowed to occupy the accommodation if they are unable to provide a reference. The licence holder must retain all references obtained for occupants for the duration of this licence.
- 2.4 Provide suitable emergency (including out of hours' response) and management arrangements
- 2.5 When requested provide the Council, in writing, details of the tenancy management arrangements that have been, or are to be, made to prevent or reduce anti-social behaviour by persons occupying or visiting the property.
- 2.6 Conduct an inspection of the property at least every 6 months to identify any problems relating to the condition and management of the property and check that common parts and external areas are free from waste. Keep a written record of the inspection specifying:
- the name of person conducting inspection
 - date and time of inspection
 - issues identified
 - action taken
- 2.7 Take prompt action to address antisocial behaviour arising from the conduct of occupants or visitors to the property by complying with the following requirements:

- On receipt of a complaint of anti-social behaviour concerning a visitor or occupant of the property do not ignore nor fail to take action and take appropriate action to monitor the allegation.
- Inform the occupants in writing about any allegation of antisocial behaviour within 14 days of receipt and consequences of its continuation.
- Where the antisocial behaviour continues after 28 days from receipt of the complaint, visit the property within 7 days and issue a warning letter advising the behaviour is not acceptable, that they are responsible for the conduct of all occupants and visitors, the impact on the local community and the consequences of its continuation.
- Take formal steps under the written statement of terms for occupation if after 14 days of giving the warning letter the anti-social behaviour is unresolved
- Notify the appropriate authorities of antisocial behaviour suspected to involve criminal activity
- Keep a written record of any meetings, telephone conversations or investigations and copies of correspondence regarding antisocial behaviour for 3 years.
- Attend any case conferences or multiagency meetings arranged by the Council or Police upon request.

3 Property Management

- 3.1 Take appropriate steps to remedy any disrepair reported by occupants.
- 3.2 Take immediate action to deal with any pest problem or infestation at the property and ensure that a treatment program is carried out to eradicate the pest infestation. Records shall be kept of such treatment programs
- 3.3 Any gas installation and gas appliance shall be kept in a safe condition at all times. All work on gas appliances must be carried out by a Gas Safe registered engineer.
- 3.4. A current valid gas safety certificate from a Gas Safe registered engineer obtained within the last 12 months, or a Gas Safe Installation Certificate if the boiler was installed in the last 12 months shall be provided to the council annually
- 3.5 The electrical installation in the property shall be maintained in a safe condition. Where requested by the council provide, within 28 days, an electrical installation report issued by a competent person within the last 5 years.
- 3.6 All electrical appliances made available by the licence holder shall be kept in a safe condition. Where requested by the council provide, within 28 days, a written declaration to the safety of such appliances
- 3.7 All furniture made available by the licence holder shall be kept in a safe condition. Where requested by the council, provide within 28 days, a written declaration as to the safety of such furniture. All upholstered furniture, covers, fillings, cushions and pillows shall comply with current fire safety requirements.

3.8A smoke alarm shall be installed on each storey of the house (which includes half-landings) on which there is a room used wholly or partly as living accommodation.

3.9 Each smoke alarm installed in any room in the house shall be kept in proper working order.

3.10 Where requested by the council, provide a written declaration confirming the positioning and condition of smoke alarms

3.11 Install a carbon monoxide alarm in any room in the property used wholly or partly as living accommodation (including a hall, landing bathroom or WC) and contains a solid fuel burning combustion appliance.

3.12 Any carbon monoxide alarm installed in any room in the property shall be kept in proper working order

3.13 Where requested by the council provide written statement, within 28 days, confirming the positioning and condition of any carbon monoxide alarms

3.14 Provide and maintain adequate security measures to prevent access by intruders and ensure that:

- The access to the property, such as locks, latches and entry systems are maintained in good working order at all times.
- The front door of the property is fitted with a mortice lock (thumb turn) or equivalent, to a five lever security level.
- Where window locks are fitted, the keys are provided to the relevant occupants.
- Where a burglar alarm is fitted to the property, the occupants are informed in writing about the circumstances under which the code for the alarm can be changed, and are given details on how this can be arranged.
- Where previous occupants have not returned keys, the relevant locks will be changed prior to new occupants moving in.

3.15 Within 7 days of the start of occupation provide written information to all occupants on the arrangements for the storage and disposal of household recycling and waste. This information must be provided in a clear and easy to understand format which occupants can refer to

3.16 No refuse shall be kept in the front or rear garden other than in an approved storage container for that purpose. Old furniture, bedding, or rubbish from the property must not be left immediately outside the property nor on private land.

3.17 Carry out regular checks to ensure that occupants are complying with the storage, recycling and disposal of waste arrangements and warn occupants if they, or their visitors, are not using the waste and recycling facilities provided or are leaving waste outside the property.

3.18 Provide adequate facilities for storing, recycling and disposing waste for the number of occupants so that bags or loose refuse or waste for recycling are not stored outside the

property. Ensure that these containers provide for the adequate separation of recyclable, garden (where applicable), food and residual waste.

4 Documents to be displayed

4.1 Either provide to all tenants at the start of the tenancy or display in the common parts of the property:

- a copy of the licence to which these conditions apply
- a notice with the name, address and emergency contact number of the licence holder or managing agent for the property
- a copy of the current gas safety certificate
- a copy of a valid electrical inspection condition report
- a copy of a valid portable appliance test certificate (PAT) covering all electrical appliances supplied within the property
- a copy of a valid test certificate for the automatic fire alarm system (dated within the last 12 months)
- a copy of a valid test certificate for the emergency lighting system (dated within the last 12 months)
- an appropriate Energy Performance Certificate (EPC)

Note: Landlords cannot grant a new tenancy after 1 April 2018 where the EPC is band F or G. After 1 April 2020 landlords must not continue to let a let property where the EPC is band F or G.

5 Financial Management

5.1 No person other than the licence holder or the agent named on the licence may collect or receive rental monies from the occupants of the property. The licence holder and/or agent may pass on the rental monies to any third parties as required.

5.2 Where rents are collected or received from occupants, payment must be recorded and all occupants receive a receipt for the payment, unless the occupant is an assured shorthold tenant and pays their rent via bank standing order or direct debit. The licence holder must keep a copy of all such records and receipts and must provide the council with a copy of the same within 28 days of any request to inspect them.

6 Material change of circumstances

6.1 The Licence Holder must inform the Authority within 21 working days of any material changes in their own circumstances and, within 21 days of becoming aware of them, of any known and material change in the circumstances of any person managing or involved in the management of the property, such as details of

- unspent convictions not previously disclosed to the Authority that may be relevant to the Licence Holder or the property manager or the status of either of them as a 'fit and

proper person', including in particular a conviction in respect of any offence involving fraud or dishonesty, violence, drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003.

- finding by a court or tribunal against the Licence Holder and/or the property manager that he or she has practiced unlawful discrimination.
- a contravention on the part of the Licence Holder or property manager relating to housing, public health, environmental health, or landlord and tenant law, which has led to civil or criminal proceedings and a judgment or finding being made against him or her.
- information about any property the Licence Holder or property manager owns or manages, or has owned or managed:
 - i. which has been made subject to a control order under section 379 of the Housing Act 1985, in the five years preceding the date of the application; or
 - ii. which has been the subject of any enforcement action described under Part 1 sections 5(2) or 7(2) of the Housing Act 2004, concerning Category 1 and Category 2 housing condition hazards; or
 - iii. in relation to which a local housing authority has either refused to grant a licence under Part 2 or 3 of the Act, or has revoked a licence.
 - iv. which has been the subject of an interim or final management order under the Housing Act 2004

7 General Requirements

- 7.1 Where requested in writing provide written copies of any information or records required by these conditions to the council within 28 days of the date of the request.
- 7.2 Arrange for access to be granted at any reasonable time and must not obstruct Council officers carrying out their statutory duties including the surveying of the property to ensure compliance with licence conditions and any relevant legislation.
- 7.3 When requested provide the council the names and numbers of individuals accommodated in the property
- 7.4 When requested provide the council with a plan of the property showing the location and size of all rooms (in square meters), including kitchen, bathroom and wc facilities. The plan shall be provided to the Council within 28 days on demand.
- 7.5 When requested provide the council within 28 days a copy of the tenancy agreement
- 7.6 Inform the Council of any change in ownership or management of the house.
- 7.7 Whilst any alteration or construction works are in progress, the work is carried out to ensure the safety to all persons occupying or visiting the premises.
- 7.8 Ensure that on completion of any works, the property shall be left in a clean tidy condition and free from builders' debris.

8 Deviation from the Licence Conditions

8.1 Any landlord who wishes to provide accommodation that requires a licence but that does not meet the licence conditions may apply in writing for a deviation from the licence conditions. The request will be considered and the landlord informed of the decision in writing.

Islington Council
Residential Environmental Health Team
222 Upper Street London N1 1XR
Phone: 020 7527 3083
Email: property.licensing@islington.gov.uk

Selective Licence Application Fee
2024-2028

| | |
|--|-------------------------------|
| Selective licence application fee | Part I: £450.00 per dwelling |
| | Part II: £350.00 per dwelling |
| | Total: £800.00 per dwelling |
| Selective licence application fee for licence holders or managers accredited under the London Landlord Accreditation Scheme, RLA, NLA, safeAgent or ANUK | Part I: £410.00 per dwelling |
| | Part II: £315.00 per dwelling |
| | Total: £725.00 per dwelling |

Equalities Impact Assessment:

Full Assessment

Summary of proposal

| | |
|----------------------------------|--|
| Name of proposal | Extend Selective Property Licensing to all privately rented properties in Hillrise and Tollington Wards and redesignate Finsbury Park Ward for Selective Licensing |
| Reference number (if applicable) | |
| Service Area | Homes and Neighbourhoods Regulatory Services |
| Date assessment completed | Resident Impact Assessment dated 19/12/2019 reviewed and Full EIA 09/05/2023 |

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

Residential Environmental Health provides a predominantly reactive approach to improving housing conditions in the private rented sector relying on tenants having the knowledge and confidence to report poor housing conditions and management standards.

Property Licensing is a tool that can be used to provide a planned approach to improving housing conditions in the private rented sector by setting clear standards for the management, facilities and conditions of properties.

There are three Property Licensing Scheme currently operating in the borough

- Mandatory Licensing Large HMOs (5 or more households)
- Additional Boroughwide Licensing HMOs for 3 or 4 households
- Selective Licensing of all one and two person households in the private rented sector in the 'old' ward of Finsbury Park

The proposal is to extend property licensing to Tollington and Hillrise wards and redesignate Finsbury Park to reflect the ward boundaries that came into effect in May 2022

Aims and Objectives

The Selective Property Licensing Scheme is a 5 year licensing scheme intended to improve conditions for tenants renting private accommodation.

In order to identify the most appropriate areas of the borough for selective licensing we collated data from a number of sources, including council and census data, private renters complaints and enforcement. The data was published as part of the statutory consultation and is attached as appendix A to the Report recommending that selective property licensing is an appropriate tool to deal with poor property conditions in privately rented properties in Finsbury Park, Tollington and Hillrise Wards support the proposal to introduce selective licensing in these wards.

If the scheme is implemented landlords would have to:

- demonstrate that they are able to manage rented accommodation and do not have any relevant criminal convictions that could present a risk to the health, safety and welfare of tenants

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

- apply for a property licence
- comply with requirements concerning the management, use and occupation of their rented property.

Affected Groups

People directly impacted by this policy are:

- landlords providing private rented accommodation in three wards
- privately renters living in in Finsbury Park, Tollington and Hillrise wards

We estimate that 5800 private renters live in properties in these three wards. The number of landlords and managing agents will be less to reflect the fact that some will own or manage a number of properties in these wards.

Benefits

The 2021 census indicates that 29% residents live in private sector rented accommodation. The 2020/21 English Housing Survey reported that the average household spent 34% of their income on rent but this is likely to be much higher now with the cost-of-living crisis. LBI inspection data for the last three years suggests that in at least 43% properties covered by the proposed schemes require some improvement in terms of property and management standards

Benefits for landlords

Selective licensing benefits landlords, tenants and the local community by helping to ensure that all private rented property within the designated areas is managed to a satisfactory standard.

Licensing creates a level playing field for responsible landlords who meet the required standards and it helps landlords to protect the investment in their property.

Licensing enables the council to identify landlords that need to take action to bring their properties up to standard and to take robust enforcement action against the minority of rogue or criminal landlords who fail to invest in their properties and meet their legal obligations.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

Benefits for tenants

Many tenants are unaware that they can complain about poor housing conditions and others fear eviction if they complain about their landlords.

Licensing allows the council to adopt a proactive approach to identifying private rented properties and undertaking a risk based approach to tackling poor housing conditions and raising standards in private rented housing.

Licensing requires the landlord to demonstrate good management practices. If a landlord is not able to demonstrate that they are a fit and proper person to manage the accommodation a licence will not be granted.

Benefits for the local community

If privately rented properties are poorly managed, this can have a negative impact on the wider neighbourhood.

Licensing helps landlords to manage their properties effectively, including the implementation of tenancy conditions to combat anti-social behaviour, poor waste management or neighbourhood nuisance caused by their tenants or people visiting their properties.

Savings

Landlords will pay an application fee, current set at £800 per property for a five-year licence. The licensing income is used to pay the cost of employing staff to administering the scheme including managing applications, issuing licenses, inspecting properties requiring a licence and any follow-up enforcement activity.

The scheme is designed to be self- financing with 100% income generated covering the cost of setting up and implementing the licensing scheme

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

Impacts

Impacts will be predominantly external

People most impacted will be:

- Private Renters living in Finsbury Park, Tollington and Hillrise wards
- Landlords and Managing Agents renting residential property in Finsbury Park Tollington and Hillrise Wards

Impact on Private Renters

Renting residential property from landlords or managing agents who

- have demonstrated that they are able to manage rented accommodation and do not have any relevant criminal convictions that could present a risk to the health safety and welfare of tenants
- meet minimum standards for providing and managing privately rented residential accommodation
- hold a licence that clearly identifies clear information about the identity of the landlord and managing agent

Impact on Landlords and Managing Agents

- landlords who do not meet the management standards will need to employ the services of a competent managing agent to manage the property
- apply and pay for a licence – currently £800
- submit copies of the gas safety, electrical safety, fire alarms, energy performance certificates as part of their application
- comply with minimum standards for the management, use and condition of rented property
- take appropriate action to bring lettings up to the required standard

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

Key sources of useful open source data in on the private rented sector are Census 2021 and English Housing Survey.

Key headlines:

65% private renters under 45 years, 43% aged 25-34years

78% private renters are in employment

Private rents are higher in London than the rest of the country,

Private rent in London is on average £353 per week - significantly higher than social and council housing rent.

The average length of tenure in the private rented sector is 4 years, significantly lower than all other forms of tenure.

There is no published data on landlords and managing agents that can assist with the EIA.

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

When considering the designation of a selective licensing schemes the legal framework requires the council to consider the follows factors:

1. the area must have a high proportion of privately rented properties
2. poor property conditions in the private rented sector
3. a significant and persistent problem caused by anti-social behaviour
4. high levels of crime
5. high levels of deprivation
6. high levels of migration
7. low housing demand

The consultation document explained the approach to collecting and analysing relevant data and concluded that level of poor property conditions in the private rented sector in Finsbury Park, Tollington and Hillrise Wards met the requirement to designate a selective licensing. Levels of anti-social behaviour, crime and deprivation were supporting factors, migration and low housing demand did not contribute to the decision to introduce the new scheme.

The Consultation Document is published on our website

[Public consultation on new proposals for private rented housing licensing scheme \(islington.gov.uk\)](https://www.islington.gov.uk)

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|-------------------------|---------------------------|---|---|
| Age | Positive | Positive impact: Improving housing conditions for private renters | Enhanced by: robust enforcement against property owners who provide sub standard or poorly managed properties |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|--------------------------------|---------------------------|--|---|
| Disability (include carers) | Neutral | | |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|-------------------------|---------------------------|---|---|
| Race or ethnicity | Positive | Positive impact: Improving housing conditions for private renters | Enhanced by: robust enforcement against property owners who provide sub-standard or poorly managed properties |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|--|---------------------------|--|---|
| Religion or belief (include no faith) | Neutral | | |
| Gender and gender reassignment (male, female, or non-binary) | Neutral | | |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|-------------------------|---------------------------|--|---|
| Maternity or pregnancy | Neutral | | |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|-------------------------------|---------------------------|--|---|
| Sex and sexual orientation | Neutral | | |
| Marriage or civil partnership | Neutral | | |

| Characteristic or group | Positive/Neutral/Negative | What are the positive and/or negative impacts? | How will potential benefits be enhanced or negative impacts be eliminated or reduced? |
|---|---------------------------|--|---|
| <p>Other Age (e.g. elderly) (e.g. people living in poverty, looked after children, people who are homeless or refugees)</p> | <p>Neutral</p> | | |

4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

Not applicable

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

Statutory and resident engagement was carried out between Dec 2021 to March 2022.

The consultation was circulated to key stakeholders including landlords, tenants, local faith groups via letters and emails, advertised through council communication channels and published on the Islington Council website.

The consultation mainly took the form of an online, sixteen question survey, including an open final question. Respondents could also write in by email and letter. Alongside the consultation survey, Islington published a Full Consultation Document, a Summary Consultation Document and a set of FAQs to fully outline the proposed scheme, the evidence and the justification for the scheme. Islington also held three online information sessions, at which officers were present to answer questions and record concerns raised. Although well-advertised, these were not well attended.

It has to be said that the consultation wasn't well responded to, despite a well-structured press and social media campaign, and letters/emails to the affected stakeholders. This could be due to the fact that the existing property licensing scheme has ensured that stakeholders are much more aware of property licensing as a concept and are accepting of the proposals compared with when the council first consulted on the existing scheme.

Consultation feedback indicated that:

Landlords were generally not supportive of the proposal

The combined feedback from interested voluntary, community or faith sector Malini, that were not landlords, and private renters supported the proposal.

The consultation feedback, and LBI response, is published in appendix C of the report proposing the adoption of the scheme

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

| Action | Responsible team or officer | Deadline |
|-----------------------|---|-----------|
| Applications received | Property Licensing Team | Quarterly |
| Inspection Outcomes | Residential Environmental Health Managers | Quarterly |
| End of Scheme Review | Residential Environmental Health Managers | Jan 2029 |

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

| Member | Name | Signed | Date |
|-----------------------------------|----------------|----------------|-------------|
| Staff member completing this form | Janice Gibbons | Janice Gibbons | 10 May 2022 |

| Member | Name | Signed | Date |
|-----------------------------|-----------------|-----------------|------------|
| Fairness and Equality Team | Hezi Yaacov-Hai | Hezi Yaacov-Hai | 19/05/2023 |
| Director or Head of Service | Andy Opie | Andy Opie | 18/5/23 |