

**London Borough of Redbridge
Planning Policy HMO Research Paper
December 2018**

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1. Introduction

1.1 Background

- 1.1.1 The purpose of this paper is to provide evidence in support of a non-immediate borough-wide Article 4 Direction to remove permitted development rights for the conversion of family dwellings into small houses of multiple occupation (HMOs) (Use Class C4). HMOs are defined as single dwelling homes or self-contained flats in houses occupied by a number of separate households. This paper summarises and builds on collected baseline data and research already undertaken by Redbridge Council into the private rental sector (PRS) and HMOs to inform the Council's additional and selective licensing schemes.
- 1.1.2 It is included as relevant evidence regarding HMOs in Redbridge because a significant proportion of privately rented properties are HMOs, and because this evidence also helps the Council in its decision on the making of a borough-wide Article 4 Direction as part of a comprehensive, holistic and coordinated set of actions from licensing and planning services.
- 1.1.3 Planning background: Amendments to the Use Classes Order in 2010 created a new C4 Use Class for small HMOs, and an amendment to the Town and Country Planning (General Permitted) (England) Order in October 2010 permitted changes of use of a property falling within Use Class C3 (dwelling houses) of the Schedule to the Use Classes Order, to a use falling within Class C4 (small HMOs). Family dwellings can be converted to small HMOs occupied by between three and six unrelated individuals sharing basic amenities without planning permission.
- 1.1.4 HMOs are an important part of the private rental sector (PRS) that provides affordable accommodation for groups that can't afford to buy their own home. They make up a significant proportion of the private rental economy in London, and can provide a good standard of affordable accommodation for people looking to step up towards owner occupation. They are also an important element of housing provision in the capital, and broaden the choices of accommodation for an increasing population faced with a low supply of housing.
- 1.1.5 However, HMOs can also have a negative impact on the community and the local environment where they are not controlled or properly managed. The Government has given local authorities the power to remove permitted development rights for small HMOs through the use of Article 4 Directions, where there is sufficient evidence to support it. A sound evidence based case must be submitted to the Secretary of State detailing why the removal of permitted development rights is required.
- 1.1.6 The Communities and Local Government (CLG) Final Report on '*Evidence Gathering - Houses in Multiple Occupation and Possible Planning Responses*' (2010), sets out how local authorities can respond to the challenges of high concentrations of poorly managed HMOs. The guidance identifies the possible negative impacts of HMOs which include:

- Anti-social behaviour
- Unsustainable communities
- Negative impacts on streets and the environment
- Parking pressures
- Increased crime
- An increase in the private rental sector and a consequential decrease in owner occupation
- Additional pressure on local community infrastructure

1.1.7 There is concern among some residents of the borough about the impact a number of HMOs are having, especially regarding the smaller HMO's which planning are not able to control. In March 2017 the Council received a petition from local residents outlining their concerns and seeking a full and open investigation into the planning issues associated with HMOs. As a response to community concerns the Council's Houses in Multiple Occupation (HMO) Scrutiny Working Group reported to Cabinet in March 2018 with a final outcome report on HMOs. This included a review focused on the associated issues with HMO's and their cumulative impact on the Borough. Recommendation 6 of the Scrutiny Working Group Final Outcome Report was that the Cabinet Member for Regeneration, Property and Planning take forward the development of a non-immediate borough wide Article 4 Direction, and that evidence gathering commences as soon as the Local Plan has been adopted.

1.1.8 Regarding HMO definitions there are differences between planning and licensing legislation. Under the Housing Act 2004, a HMO means a building (or part of a building, such as a flat) occupied by more than one household that share or lacks an amenity, such as a bathroom, toilet or cooking facilities. The building may be occupied by more than one household where the building is converted, but not entirely into self-contained flats. The building may also be converted into self-contained flats, but does not meet as a minimum standard in the requirements of the 1991 Building Regulations (known as s275 HMOs), and at least one third of flats are occupied under short tenancies.

2. The Private Rental Sector (PRS) in Redbridge

2.1.1 Accommodation types in Redbridge: Table 1 below shows in percentages the level of different types of housing in Redbridge by ward (taken from the 2011 census). In 2011 24% of households in Redbridge were privately rented, which could include properties in all the housing types in table 1. The table shows that terraced and semi-detached housing types are predominant in the borough, however some wards have such a high level of private rental sector properties, such as Clementswood (45%) and Valentines (38%) that their conversion to HMOs is a trend that threatens the numbers of single-family housing in those wards, and others with high levels of PRS properties.

2.1.2 The research presented in the remainder of this section indicates a trend of significant growth in the private rental sector (PRS) – a significant proportion of which consists of HMOs. Census data is presented to support the overall evidence, and although this data is not as recent the paper also uses a broad range of data from more recent studies and data sources. Clearly the growth of the PRS has influenced the number of HMOs as a large subset of the private rental economy in Redbridge. The research paper shows significant concentrations of HMOs in the more built up areas of the borough, but also that HMOs are prevalent in all parts of the borough.

Table 1: Accommodation types in Redbridge 2011 (source 2011 Census).

Accommodation Types in Redbridge Wards (2011 Census Data)								
Ward	All household spaces	Percentage of all household spaces which are of accommodation type			percentage of all household spaces which are of accommodation type			
		Whole house or bungalow			Flat maisonette or apartment			Caravan or other mobile or temporary structure
		Detached	Semi-detached	Terraced	Purpose built block of flats	Part of converted or shared house	In a commercial building	
Aldborough	5121	4.9%	25.1%	43.5%	23.5%	2.2%	0.9%	0.1%
Barkingside	4427	4.2%	31.5%	40.2%	19.0%	2.8%	2.3%	0.0%
Bridge	4854	4.3%	32.5%	38.1%	20.0%	3.0%	2.1%	0.0%
Chadwell	5256	3.8%	25.9%	38.7%	29.3%	1.4%	0.9%	0.0%
Church End	5130	4.6%	26.8%	15.7%	41.5%	9.1%	2.3%	0.0%
Clayhall	4181	7.2%	48.7%	30.4%	11.5%	1.1%	1.0%	0.1%
Clem'swood	4586	7.7%	12.4%	45.0%	21.8%	9.7%	3.4%	0.0%
Cranbrook	4121	3.5%	27.8%	39.7%	15.8%	11.7%	1.4%	0.0%
Fairlop	5094	7.4%	28.8%	37.7%	21.3%	2.7%	2.2%	0.0%
Fullwell	4882	7.6%	43.7%	21.9%	23.5%	1.7%	1.6%	0.0%
Goodmayes	4242	6.3%	22.1%	42.2%	16.8%	10.3%	2.2%	0.0%
Hainault	5398	4.2%	34.8%	38.7%	20.8%	0.9%	0.3%	0.3%
Loxford	5223	8.9%	12.2%	42.8%	30.2%	4.3%	1.5%	0.0%
Mayfield	4346	10.8%	26.6%	47.3%	12.4%	2.2%	0.7%	0.0%
Monkhams	4430	28.4%	27.3%	11.9%	27.9%	3.0%	1.2%	0.3%
Newbury	5376	4.5%	17.8%	48.2%	22.3%	5.5%	1.5%	0.1%
Roding	4808	2.8%	31.1%	27.2%	30.5%	7.0%	1.4%	0.0%
Seven Kings	4864	6.1%	20.4%	42.9%	15.9%	12.3%	2.3%	0.1%
Snaresbrook	5599	7.3%	19.8%	16.5%	44.0%	10.8%	1.5%	0.0%
Valentines	4935	4.7%	31.1%	31.6%	19.3%	29.3%	1.9%	0.0%
Wanstead	4702	6.2%	31.6%	30.4%	25.7%	5.7%	0.2%	0.2%
Redbridge average	4873	6.8%	26.4%	34.7%	23.9%	6.5%	1.6%	0.1%
London Average	5419	6.2%	18.6%	23.0%	37.5%	12.7%	1.8%	0.1%

2.1.3 Existing evidence: Analysis from a key Redbridge Council study into the PRS in support of licensing schemes in the borough¹ states that in Redbridge it is roughly split 50:50 between single households and HMOs. Based on its predictive analysis it suggests that there are up to approximately 11,250 HMOs in the borough (at the time of the study in 2014). As the trend of expansion in the PRS continues numbers of HMOs can be expected to rise in all parts of the borough, particularly where there are key transport connections.

2.1.4 The PRS has expanded London-wide and census data from 2001 to 2011 shows a very sharp rise in Redbridge (table 2 below). Whereas owner

¹ 'Anti-social behaviour and the rise of the private rented sector in the London Borough of Redbridge' (2014), Dr. L Mayhew.

occupation fell by 7.6%, and social housing rose by 20.7%, there was a very large rise in PRS of 77.2%. This shows some displacement of owner occupation by the PRS.

Table 2: Changes in tenancy between 2001 and 2011 (source: 2001 and 2011 census)

Redbridge	2001	2011	Change %
Owner occupied	69,488	63,986	-7.6%
Social housing	9,354	11,289	20.7
Private rented	13,446	23,830	77.2
Total	92,288	99,105	7.4

2.1.5 Census data: The 2011 census shows that 64.6% of the housing stock in Redbridge was owner occupied, 11.4% social rented and 24% private rented. The wards in the borough with the largest PRS as a percentage of all housing include Clementswood, Valentines, Seven Kings, Loxford and Goodmayes, which saw rises between 2001 and 2011 of 29%, 14.7%, 20.1%, 13.9% and 15.5% respectively. The smallest increases were in Wanstead (4.7%), Clayhall (6.1%) and Monkams (5%), but there were increases borough-wide, including in areas with key transport hubs at Snaresbrook, Newbury, Church End and Wanstead.

2.1.6 Data for Licensing schemes: Table 3 below is taken from the Council's 'Redbridge Selective Licensing; Evidence Base' report (April 2016), and shows the 14 wards in Redbridge (60% of the borough's geographical area) where the ratio of PRS is higher than the national average of 19%. The report, which contains analysis supporting a borough-wide Selective Licensing Scheme in Redbridge also states that between 2001 and 2015 there was a 105% increase in private rental households in Redbridge, (24,717 households). This rising trend has continued as Redbridge experiences a fast growing population and low supply of new housing.

Table 3: Wards in Redbridge with high ratios of PRS ('Redbridge Selective Licensing; Evidence Base' April 2016). John Phillipson and Edward Baker

Ward	% of PRS
Valentines	45%
Clementswood	38%
Loxford	34%
Seven Kings	31%
Goodmayes	30%
Snaresbrook	27%
Newbury	26%
Cranbrook	24%
Chadwell	20%
Roding	20%
Mayfield	20%
Fairlop	20%
Church End	20%
Aldborough	21%

2.1.7 ONS data: To underscore this continued sharp rise table 4 below shows the percentage of tenure types in Redbridge between 2006 and 2016, taken from ONS data; the rise in the PRS is clear, as is the reduction in the numbers of buying through mortgages. Between the 2001 and 2011 censuses Redbridge saw a decrease of more than nine percentage points in the proportion of households who owned their accommodation with a mortgage or loan (from 44.5% to 35.4%). During this time, private renting increased from 14.6% to 24%, showing a trend of displacement of owner occupation with privately rented properties in the borough.

Table 4: tenure in Redbridge 2006-2016. Source: ONS data and the Annual Population Survey

Redbridge Tenure Types 2006-2016					
Year	Outright own	Buying with mortgage	Renting from LA or HA	Rented from private landlord	Total
2006	26,300	39,700	11,900	15,600	93,500
2007	29,700	37,200	14,100	16,600	97,600
2008	27,000	34,400	11,300	17,700	90,400
2009	29,100	39,400	10,600	18,400	97,500
2010	31,700	35,500	10,400	21,700	99,300
2011	29,100	33,500	12,000	24,800	99,400
2012	28,300	37,000	9,800	22,400	97,500
2013	28,800	36,400	8,500	25,200	98,900
2014	32,600	37,000	11,100	24,500	105,200
2015	33,100	34,000	9,000	24,800	100,900
2016	30,500	33,400	10,000	28,600	102,600

2.1.8 Property Licensing database: Table 5 on the next page shows estimated levels of PRS in Redbridge in 2017. This data is derived from the predictive tenure intelligent model database (TIM) developed by Property Licensing as part of further work on investigating the prevalence of the PRS and HMOs within the borough. The model predicts if a property is privately rented by making comparisons between known HMOs and PRS homes, and properties in the rest of the borough, identifying properties with similar profiles. It gives a percentage figure for the 'risk' of addresses being either privately rented or a HMO. The prediction data was updated in November 2017.

2.1.9 The data in table 5 indicates high and low estimates for PRS by ward, and the lower conservative estimate of 33% (predicted PRS at 35,659 units) shows an increase on the numbers of PRS properties presented above. This estimate is closer to the 2016 ONS projection of approximately 28% (around 28,600), as shown in figs 1 and 2 on page 8, and likely to be the more realistic figure.

Table 5: data taken from Property Licensing tenure intelligent model (TIM), showing high and low estimates for the private rental sector in Redbridge (2017).

Old ward name	Highest estimate		Lowest estimate		Total houses in the ward
	Predicted PRS	% of PRS	Predicted PRS	% of PRS	
Aldborough	2244	46%	1506	31%	4829
Barkingside	1916	45%	1270	30%	4277
Bridge	2096	45%	1213	26%	4651
Church End	2654	56%	1739	37%	4761
Chadwell	2779	53%	1889	36%	5222
Clayhall	1403	34%	863	21%	4074
Cranbrook	1801	45%	1276	32%	3992
Clementswood	2490	53%	2037	43%	4722
Fairlop	2443	50%	1521	31%	4917
Fullwell	2128	45%	1318	28%	4727
Goodmayes	2218	52%	1630	38%	4252
Hainault	2143	42%	1241	24%	5152
Loxford	2805	57%	2225	45%	4916
Mayfield	1928	45%	1280	30%	4275
Monkhams	1972	46%	1089	26%	4259
Newbury	2567	48%	1899	36%	5349
Roding	2085	45%	1302	28%	4681
Seven Kings	2452	50%	1846	37%	4950
Snaresbrook	2882	57%	1741	35%	5021
Valentines	2700	56%	2150	45%	4797
Wanstead	1966	45%	1125	26%	4400
Grand Total	52088	49%	35659	33%	106985

Fig 1: Redbridge household tenure data 2016 as percentages

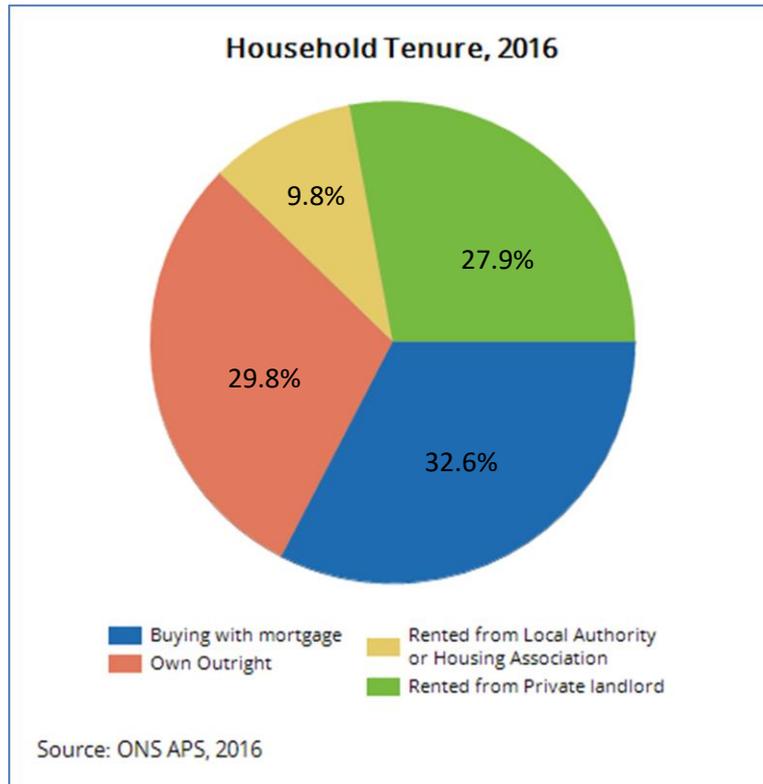
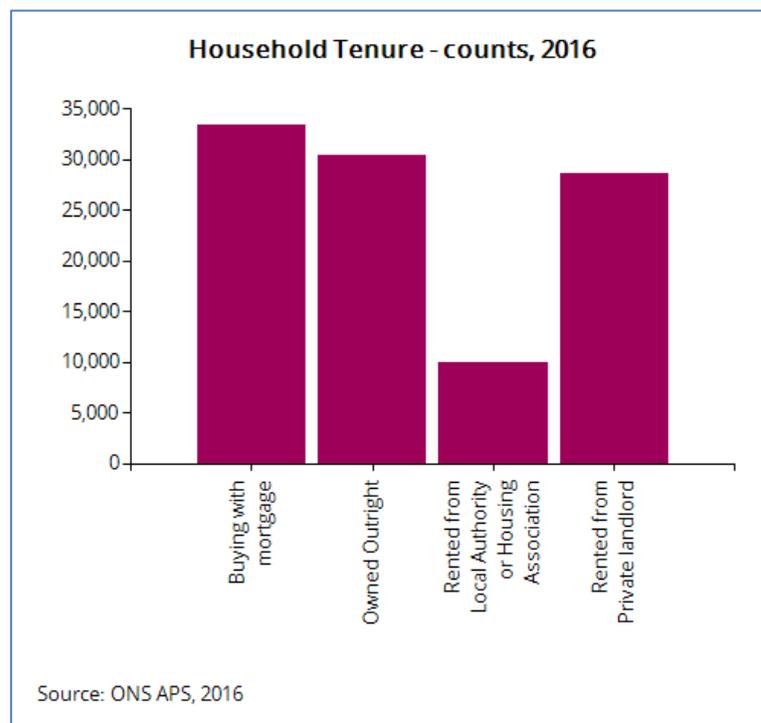
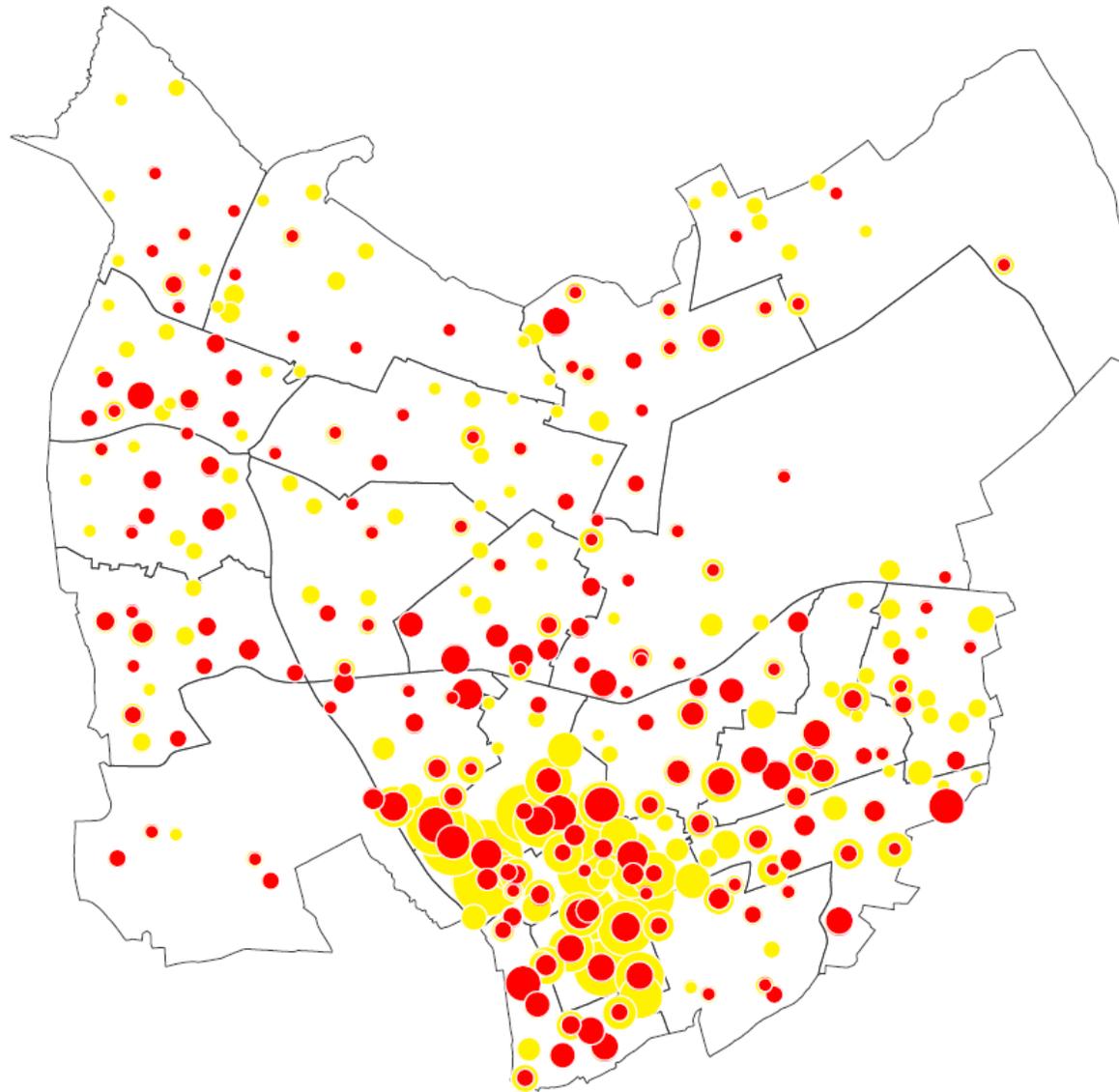


Fig 2: Redbridge household tenure data numbers 2016



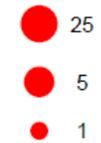
3 Quantum and spatial distribution of HMOs in Redbridge

- 3.1.1 Identifying HMOs in the borough: There is no comprehensive up-to-date information that can verify whether an individual property is owner occupied or privately rented, and we can only be sure that a property is either in the private sector, part of Council housing stock or social housing. It is also unclear whether a property is an HMO, or being rented by a single family or householder, unless verified by site visits.
- 2.1.10 This section builds a spatial picture of HMOs in the borough using data from available registered certificates for small HMOs and planning applications for large HMOs, and data from planning enforcement, property licensing, Council tax, and from the electoral register. By bringing together data from a number of service areas we can build a more accurate picture of the number and location of HMOs in the borough. The TIM database contains 3,600 addresses in the borough known to be in the PRS and shown on map 1 on the next page below, which includes 651 known HMOs. These are small numbers but the predictive model is still maturing and as it records more data it will become more accurate over time.
- 3.1.2 Planning and Enforcement data
- 3.1.3 Planning Services undertook a search of the planning register for all certificates and planning applications for HMOs over the previous 10 years (2008-2018) and found 160 cases (decisions) for small and large HMOs. This data was spatially mapped and appears on map 2 on page 11. The majority of the HMOs are located in the south of the borough where there are significant concentrations, although there are more HMOs borough wide. The Clementswood Ward (Ilford) shows the highest concentration of small HMO applications, and that ward is known to have a high volume of HMO clusters, but overall HMOs are also concentrated in Valentines, Ilford Town, Loxford, Newbury, Seven Kings and Goodmayes wards. However, there are also concentrations in wards north of the A12/Eastern Avenue road. The distribution shown only represents a fraction of HMOs in the borough because the majority of HMO conversions are not submitted to the Council as planning applications or certificates.
- 3.1.4 Map 3 on page 12 shows all registered Enforcement cases for HMOs (2008-2018, 363 cases). Again, the highest concentrations are in the south of the borough but the distributions show a borough wide issue. This is better understood when we consider that actioned cases only include identified or known breaches, and it is likely that the majority of HMO breaches in the borough are not yet identified. The cases shown on map 3 include '*beds in sheds*'; unauthorised conversions; garages to flats; large HMOs without permission; unauthorised HMOs used as guesthouses. These are categorised as priority 1 cases (significant harm) in accordance with the Planning Enforcement and Direct Action Policy. The Council would like to use additional powers to control these issues, a borough-wide Article 4 Direction for small HMOs will allow the Planning department to control the number of new small HMO's and in turn help tackle the negative effects associated with this use.

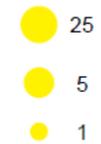


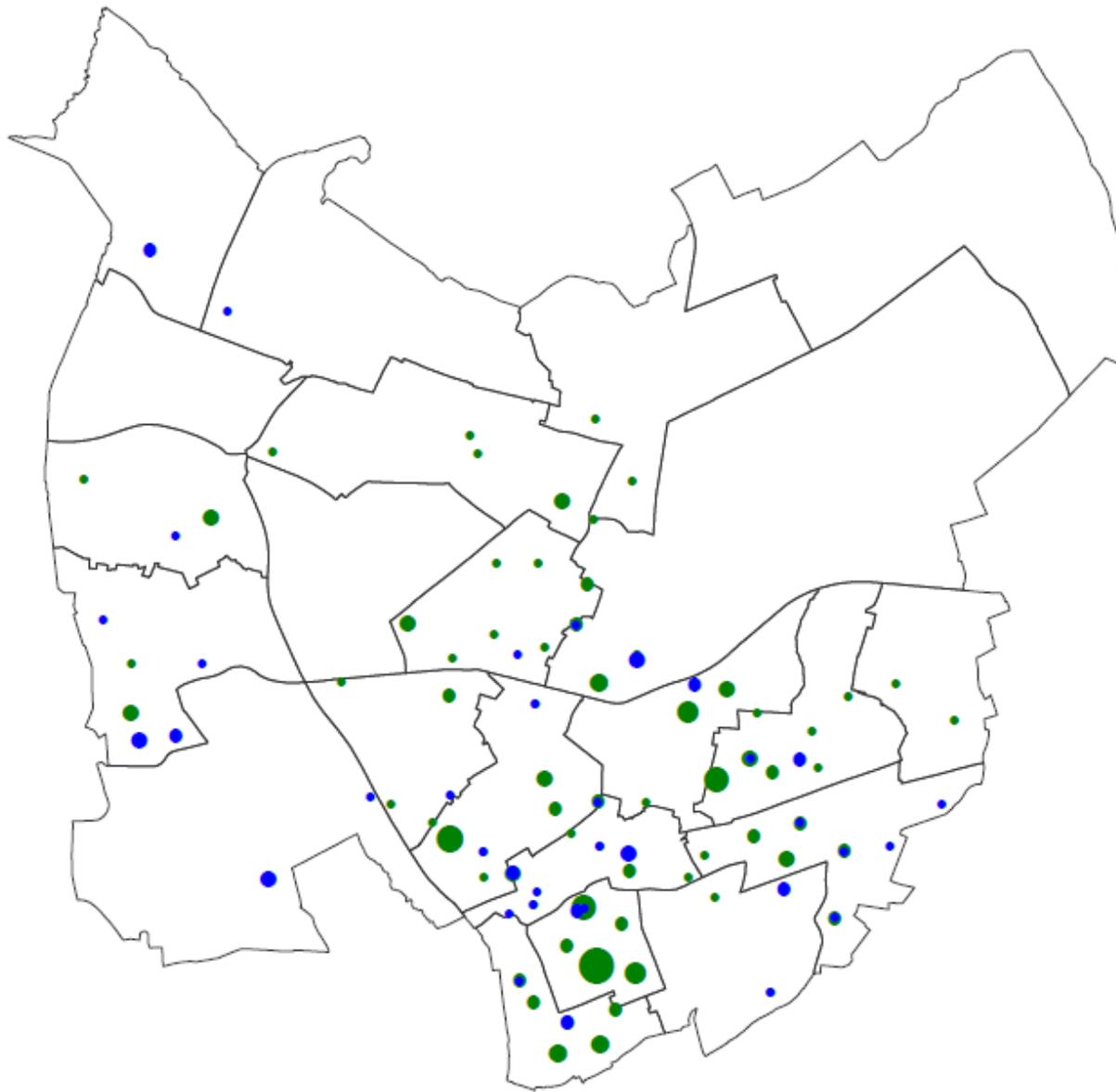
Map 1: Known PRS properties in the borough showing approximately 3,600 properties within the PRS (red and yellow dots). The red dots show concentrations of known HMOs. Data provided by Property Licensing TIM database (2018)

HMOs (count)



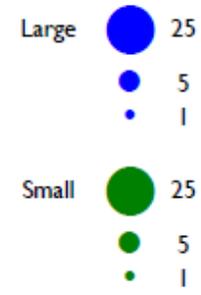
Others (count)

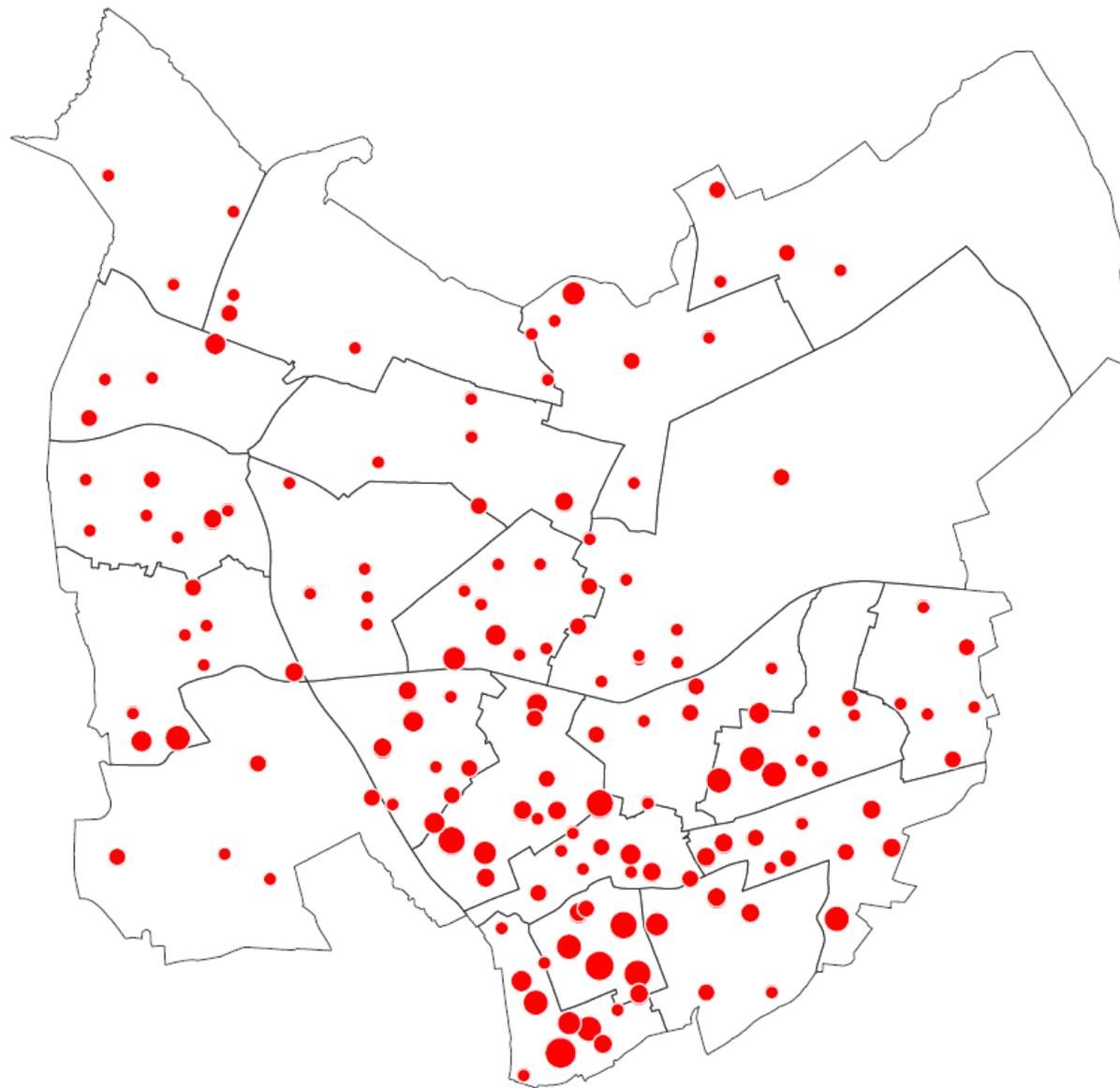




Map 2: planning application (decisions) for large and small HMOs 2008-2018.

HMOs (count)



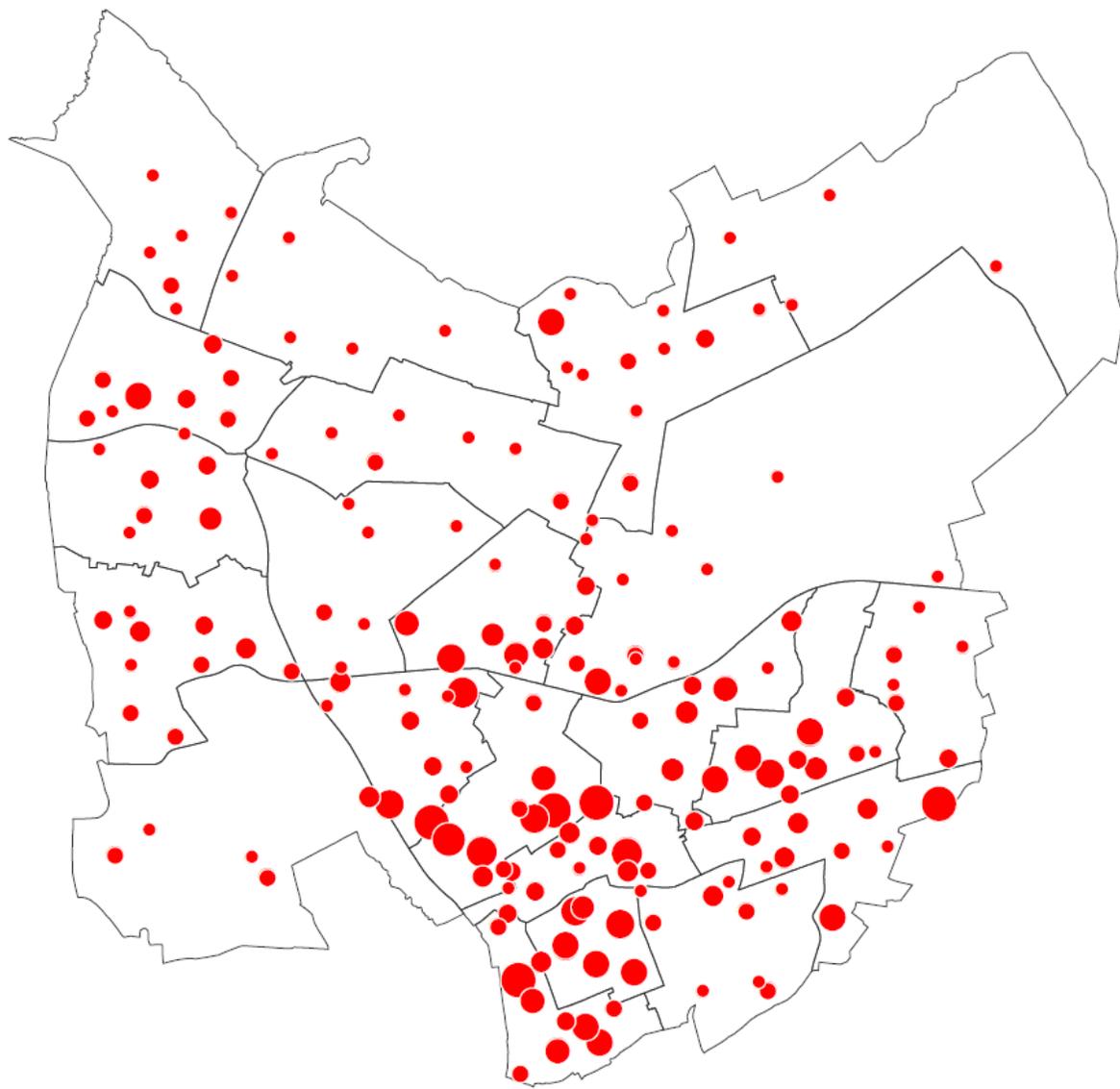


Map 3: Enforcements cases in Redbridge 2008-2018

HMOs (count)

-  25
-  5
-  1

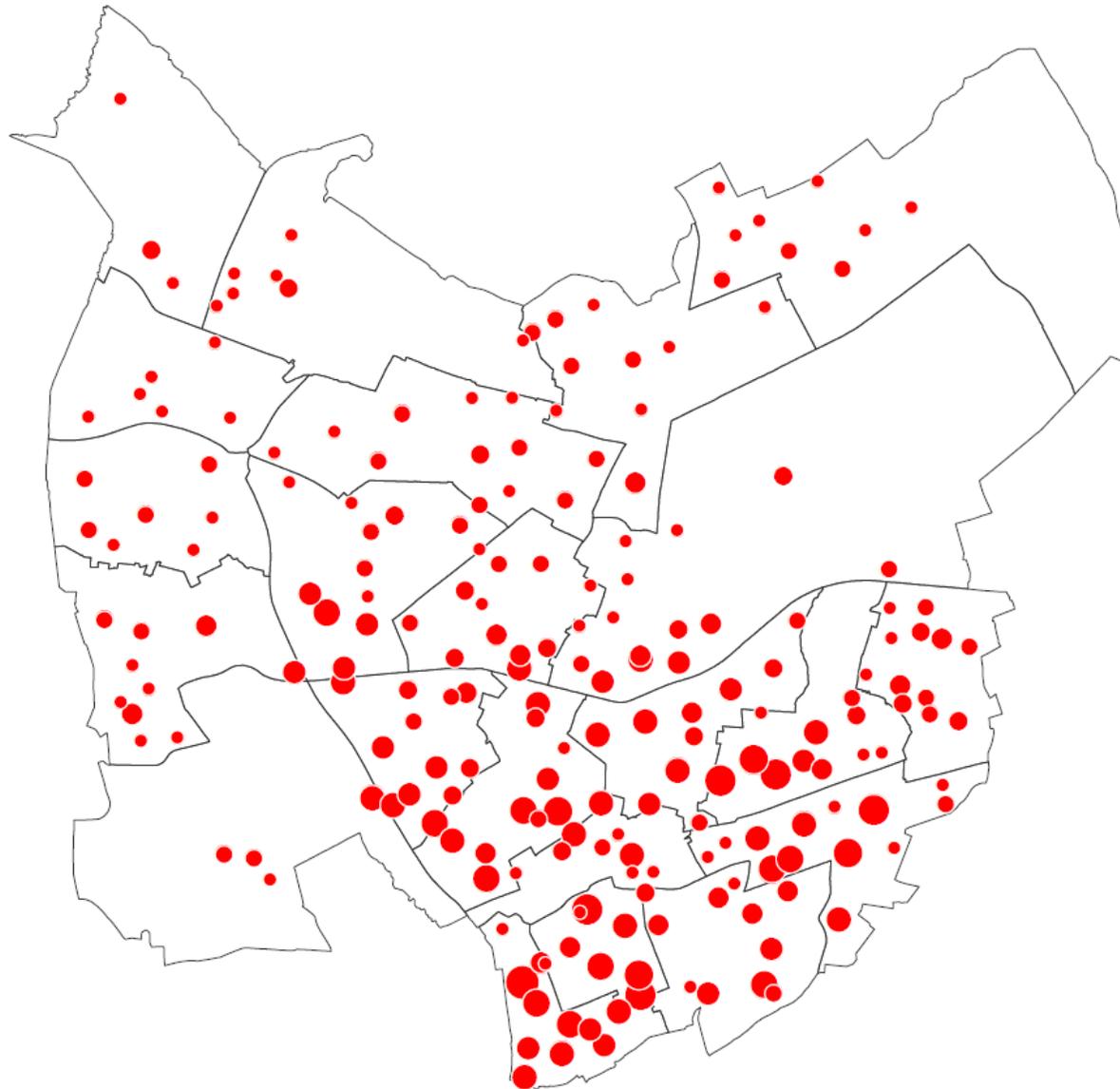
- 3.1.6. Property Licensing: Map 4 on the following page shows the Property Licensing data mentioned in section 2, showing 651 properties in the borough that are known to be HMOs. These were identified by Housing Enforcement through resident complaints and inspection visits. This is very accurate up-to-date data, and again, the distribution on map 4 shows that the majority of the known HMOs identified are within the south of the borough but there are also many in wards on and north of the A12/Eastern Avenue road. However, because the PRS in Redbridge likely consists of between 28,000 and 33,000 properties, HMOs make up a significant proportion of this number and there are far more than 651 HMOs in the borough.
- 3.1.7. Up to March 2018, there are 268 licensed HMOs on the Redbridge online licensed property register. However, the data shown on map 4 was reported in July 2018 and consists of 197 mandatory licensed HMOs, and 135 are on the additional licensing scheme (a total of 332). The remaining 319 HMOs include bedsits; shared houses; hostels/B&Bs; self-contained flats; un-licensed and suspected unlicensed HMOs. It should be considered that the HMOs on the Council's online register and the HMOs on map 4 are not all within the planning definition of HMOs.
- 3.1.8. Surname analysis of Electoral Roll and Council Tax data: Maps 5 to 6 on pages 15 and 16 respectively show the distribution of properties in the borough on the Electoral Roll and the Council Tax register with six or more different surnames. Although it is difficult to know accurately these indicators suggest a high risk of properties being HMOs.
- 3.1.9. The Electoral Roll data is shown on Map 5, and because of the number of different surnames the majority of these properties are likely to be HMOs. Fairly high concentrations are shown borough wide, but the highest numbers are in the south. Although the definition of HMOs for the purposes of Council Tax is different to the planning definition for small HMOs in the Use Classes Order, map 6 can still provide a useful indication of the spatial distribution and clustering of HMOs in the borough.
- 3.1.10. This mapped data has a reasonably high degree of accuracy and probability of consisting mostly of HMOs. What is immediately clear is that the pattern in terms of distribution is similar to the previous maps – high concentrations of HMOs in the south of the borough, with HMOs also north of the A12/Eastern Avenue. The Electoral Roll data shows approximately 556 potential HMOs and the Council Tax data shows almost 2,000, offering a very good indication of HMO locations and concentrations borough wide. It is likely that what is shown on both maps is only a small proportion of the number of HMOs in the borough, and it is reasonable to conclude that HMOs very probably exist in high numbers borough-wide.



Map 4: Known HMO - showing approximately 651 properties within the PRS that are known HMOs. Data provided by Property Licensing TIM database (2018)

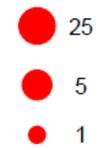
HMOs (count)

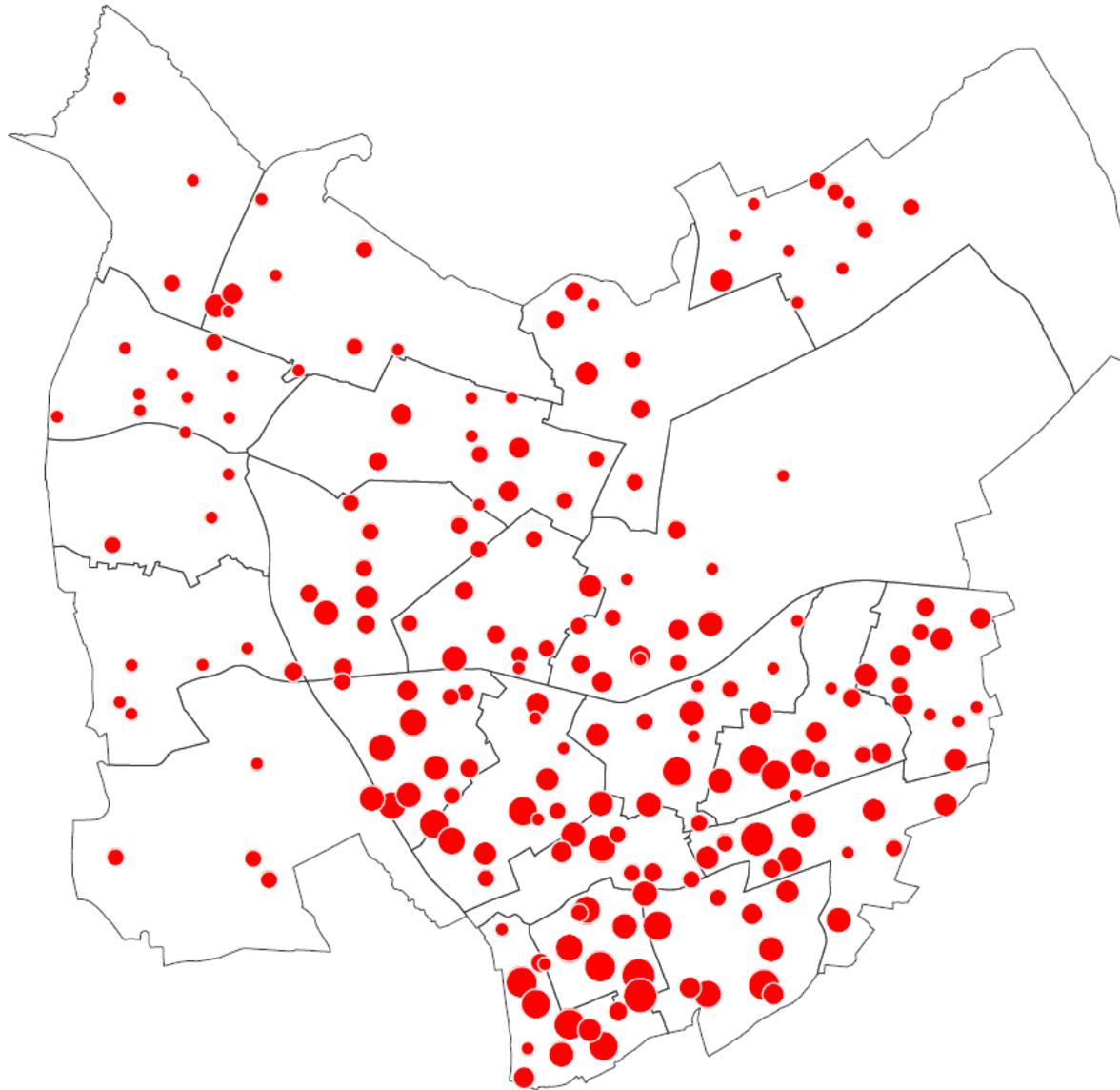
- 25
- 5
- 1



Map 5: Electoral Roll data showing 6 and more different registered surnames

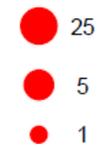
HMOs (count)





Map 6: Council Tax data showing 6 and more registered surnames

HMOs (count)



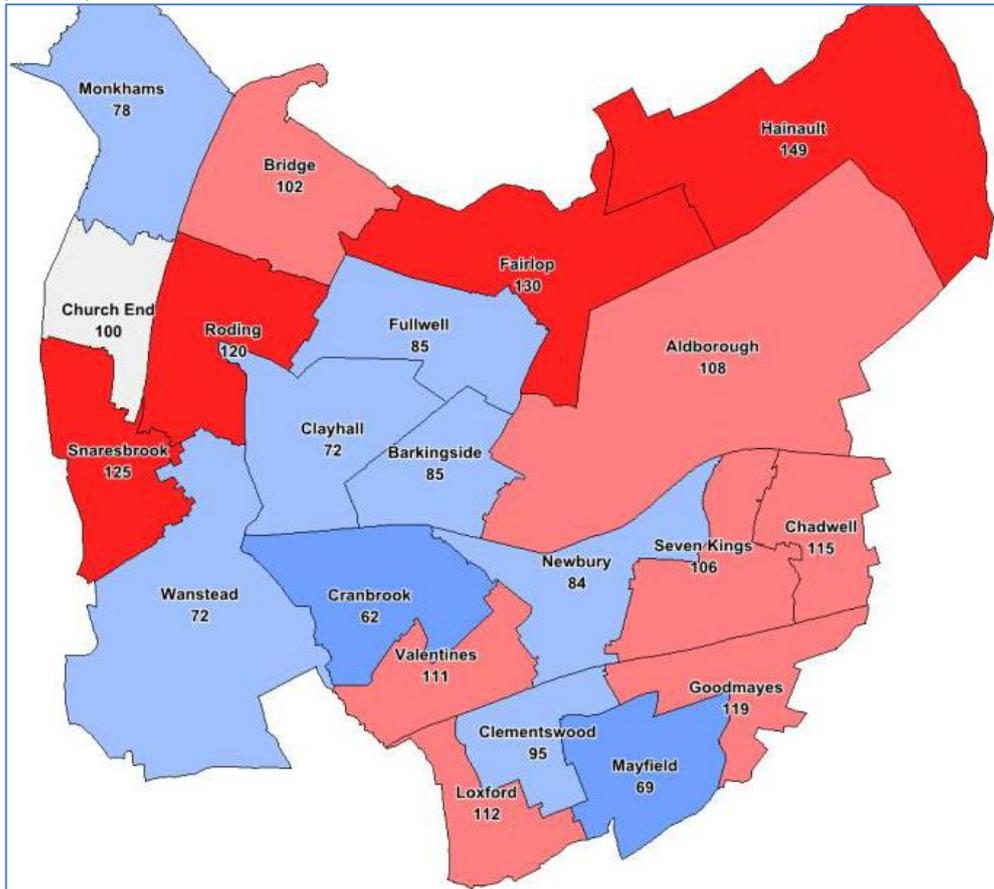
4. Anti-Social Behaviour (ASB), Crime and links to the PRS and HMOs

- 4.1.1 The following information is taken from a number of studies undertaken by the Council for the additional and selective property licensing schemes implemented in the borough. These studies looked at anti-social behaviour (ASB) and crime, its prevalence, location and its links to the PRS and HMOs. The studies indicate a strong link between private rental properties, including HMOs, and ASB and related crime, such as residential burglary. The overall finding is that instances of ASB and crime occur borough wide but are increased where there are higher concentrations of the PRS, and accordingly HMOs.
- 4.1.2 Anti-social behaviour (ASB): The key instances of ASB in the borough include noise and nuisance neighbours, fly-tipping, untidy and overgrown gardens and pest control incidences. Council research supporting licensing schemes for private rented properties has also linked ASB to the failure of private landlords within the PRS to manage properties effectively.
- 4.1.3 Redbridge Council records ASB on its FLARE database, 86% of reports are related to noise. A second database is related to enviro-crime, including fly-tipping, graffiti, fly-posting and vehicular litter; and a third database reports incidence of pest control (mice, rats, insects etc.). Police data for crime or ASB is captured through 999 and 101 calls, and the reporting system known as CRIS. It includes burglary and criminal damage to properties, which can be deemed as ASB.
- 4.1.4 Analysis of residential noise and nuisance complaints shows that 38% could be directly linked to residential properties from privately rented accommodation, which is disproportionately high compared to the percentage of the PRS in the borough (around 28-33%). Although the data does not distinguish HMOs from privately rented single households the assumption that a significant proportion of complaints relate to HMOs is reasonable considering that the PRS consists of potentially up to 50% HMOs.
- 4.1.5 Complaints about noise related ASB occur borough-wide, and of the 14 wards in the borough that have high rates of PRS properties 10 have a greater than national average number of noise nuisance complaints². This indicates a strong link between the PRS and noise related ASB. As a whole Redbridge receives an average of 12.6 noise complaints per 1,000 population which is almost double the national average. Map 7 on the following page shows the index of noise complaint incidences in each ward in 2015. It also shows a correlation with the number of HMOs in wards in the south of the borough, as shown by the data mapping in section 3, and the number of complaints in those areas, which are represented by the red areas on the map. These include Valentines (which now incorporates Ilford Town), Loxford, Seven Kings, Chadwell and Goodmayes³, although the highest number of complaints are in the north.

² The national average for noise complaints was 7.08 per 1,000 population (2016)

³ The wards on map 7 are represented under the old ward boundaries when the data was collected in 2015.

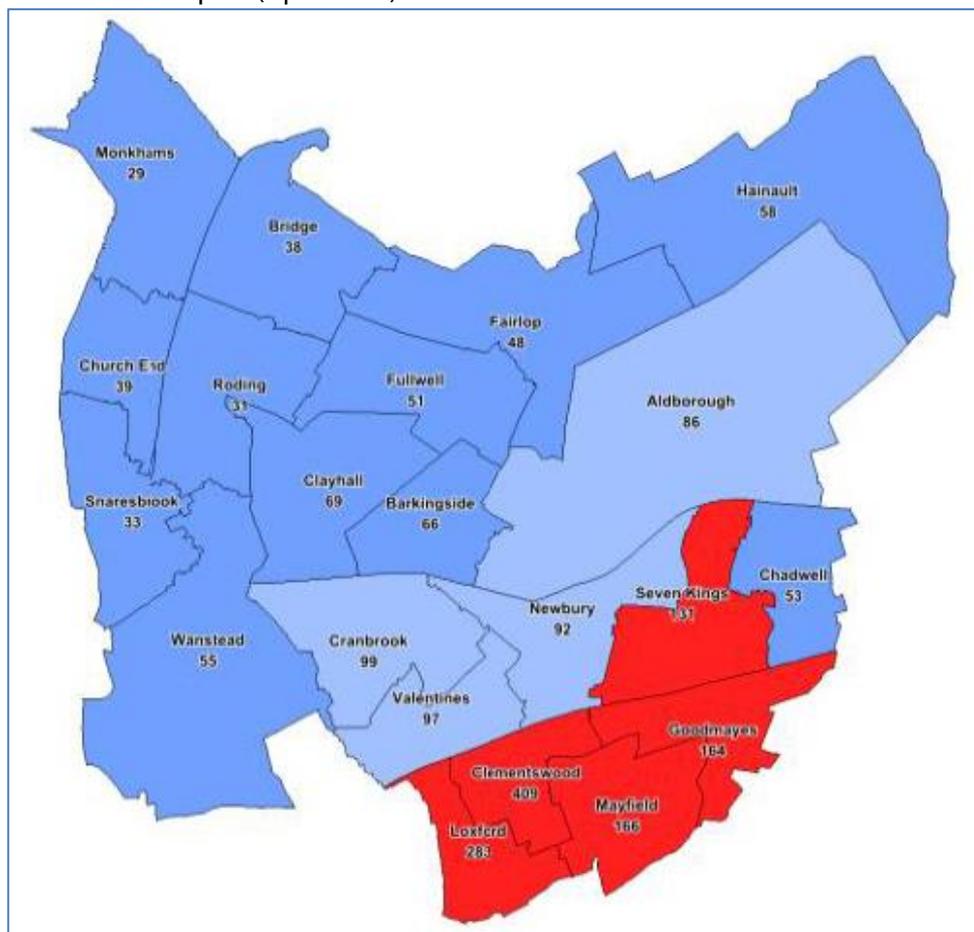
Map 7: number of noise complaints by ward ('Redbridge Selective Licensing: Evidence Base' report (April 2016))



4.1.6 Fly-tipping has also been a consistent and increasing ASB problem for Redbridge, at 77% it makes up the greater proportion of enviro-crime in the borough. Between 2013 and 2015 there were 8,157 notices issued by street scene officers in relation to environmental crime incidents, such as graffiti, fly-tipping, abandoned vehicles etc. Over 70% of these notices were issued in wards with a higher than national average of PRS properties, where the highest proportion of HMOs are likely to exist in the borough.

4.1.7 Between 2013 and 2015 85% of all fly-tipping incidents (24,771 incidents) took place in the 14 wards that have high levels of the PRS and the highest concentrations of HMOs, indicating a strong link between the PRS and HMOs and fly-tipping. Map 8 on the following page also shows fly-tipping data for the same period, and clearly there is a disproportionate concentration of fly-tipping incidents in the most southern wards in Redbridge. The ward with the biggest problem is Clementswood with an index score of 409 where fly-tipping is 4 times more likely to happen than in other wards.

Map 8: Fly-tipping index scores by borough 2013-2015 ('Redbridge Selective Licensing: Evidence Base' report (April 2016))

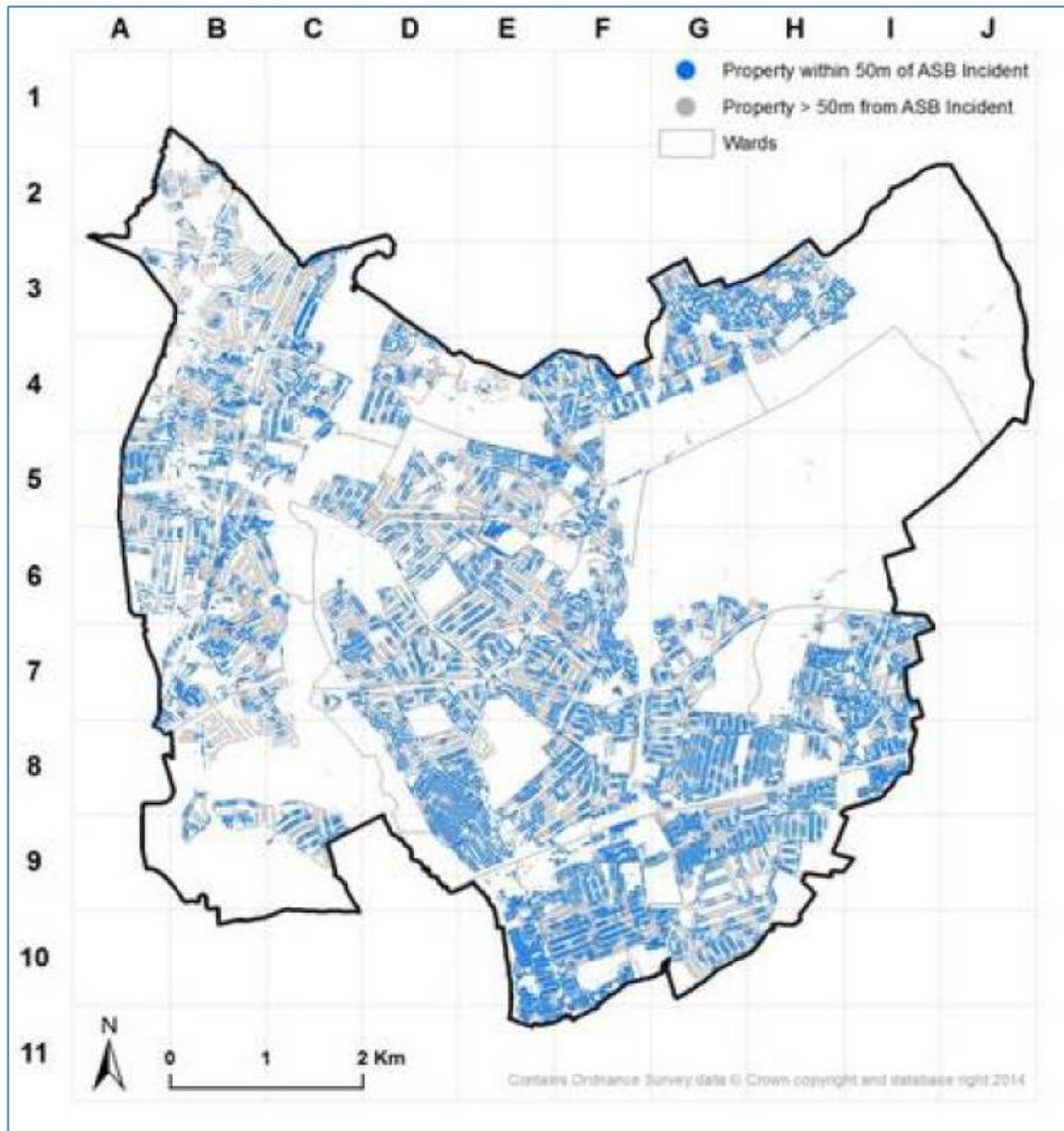


4.1.8 Geographical distribution of anti-social behaviour (ASB)

4.1.9 Council research into anti-social behaviour (ASB) and its links to the private rented sector (PRS) in Redbridge concludes that ASB is widespread in the borough although there are 'hotspots' where it is more intense. This was further demonstrated through the mapping of data recorded on the Council's FLARE database which records ASB by date, time and address. Map 9 on the following page shows residential properties in Redbridge within 50m of an ASB incident (blue areas) and those that are 50m or more away from an ASB incident (grey areas). There are 41,733 properties in Redbridge affected by ASB – a 2014⁴ study states that no area of the borough is completely immune, and higher numbers of rental properties increase the causes and incidents of ASB.

⁴ 'Anti-social behaviour and the rise of the private rented sector in the London Borough of Redbridge' (2014), Dr. L Mayhew.

Map 9: property level map in which properties that are located within 50m of an ASB incident are colour coded blue



4.1.10 In order to show a direct link between ASB and the rental status of properties the study undertook further detailed analysis by profiling risk factors at property level. The FLARE database of ASB was used again to provide a property level assessment, and 93,672 private sector properties were analysed. By profiling properties in this way a clearer picture emerged about which types of properties are at risk of ASB and their number. The study found that the average risk of ASB across all properties/tenures is 3.9%, and that some types of households are more at risk or more likely to be associated with ASB than others. Private sector benefit households for instance, which includes HMOs, has one of the highest ASB risk factors of 6.4% in terms of its association with ASB (see table 6 on the following page).

Table 6: ASB risk gradient for some types of households, based on FLARE database

Household type	ASB risk factor
Non-benefit private	3.5%
Non-benefit social	5.2%
Private sector benefit	6.4%
Benefit social	7.3%

- 4.1.11 The study used further data sets to directly identify HMOs in Redbridge using indicators such as addresses with no Council Tax Reduction Scheme recipient (CTRS); multiple changes to Council Tax liable surnames; and multiple changes to electoral roll surnames. These indicators/datasets are associated with properties at highest risk or likelihood of being HMOs, with results suggesting, as highlighted in section 2, that in 2014 there were 11,250 properties in Redbridge with a high probability of being HMOs.
- 4.1.12 A further key finding is when looking at all private properties as a group, whether rented or not, the occurrence of ASB incidences based on the FLARE database is 4.53%. However, if the data is restricted to just the highest risk HMO categories the incidences almost doubles to 8.4%. The study also found that the incidence of ASB in private rental properties with both single households and HMOs is statistically significantly higher than in the non-rented private sector.
- 4.1.13 This approach to identifying PRS properties and HMOs by profiling through the use of predictive risk factors has been used by the London Borough of Newham. They have been progressing a selective licensing scheme for over five years and have used the methodology to identify HMOs and single family private rented dwellings. The methodology is probabilistic and only gives a score of whether a property is at high risk of being privately rented or not. Nevertheless, using this methodology high risk properties (those with high scores) not registered on the Newham licensing scheme were visited and identified to a 90% degree of accuracy.
- 4.1.14 Crime: In 2017 Redbridge ranked 2nd in London for residential burglary, with a crime rate of 6.48 per 1,000 population. There were 1,516 offences recorded in 2016 which increased to 2,398 in 2017, an increase of 58%. The percentage increase for the same period in London was less at 26.7%. Residential burglary has the highest number of recorded offences in Redbridge.
- 4.1.15 Table 7 on the following page compares incidences of residential burglary in Redbridge with London, highlighting the 12 wards in the borough included in the Council's proposed selective licensing designation (scheme 2). These are also 12 of the 14 Wards in Redbridge with the highest ratios of PRS properties from table 2 above. The wards are largely in the south of the borough where there is the highest concentrations of HMOs. 50% of all burglaries in Redbridge took place in these wards in 2017, but other wards outside these areas have also had a year-on-year increase of between 25 and 40%, showing that this is a borough wide problem.

Table 7: offences and crime rate by Force Area (London), Redbridge, and Redbridge wards.

Area/proposed selective licensing designation	Residential burglary numbers of offences January-December 2016	Residential burglary crime rate (%) January-December 2016	Residential burglary number of offences January-December 2017	Residential burglary crime rate (%) January-December 2017
London	43018	3.08	54508	5.05
Redbridge	1516	4.1	2398	6.48
Aldborough	95	4.95	125	6.51
Chadwell	70	3.63	108	5.61
Church End	51	3.31	105	6.81
Cranbrook	59	3.59	104	6.33
Fairlop	77	4.76	108	6.67
Goodmayes	37	2.17	106	6.21
Loxford	68	3.35	86	4.24
Mayfield	60	3.36	103	5.78
Newbury	93	4.27	113	5.18
Roding	93	5.88	129	8.16
Seven Kings	55	2.75	102	5.09
Snaresbrook	65	4.15	122	7.79
Total designations	823	46.17	1311	74.38

4.1.16 Redbridge has also had a problem with prostitution, and in February 2016 the police shut down 11 brothels, almost the same number as those closed between March and October 2015 (12 brothels). The Redbridge Prostitution Strategy 2017-2021 is a coordinated, multi-agency prevention and enforcement strategy to address on and off-street prostitution, and is supported by a Council commissioned study that specifically explores 'indoor' prostitution. The strategy would be strengthened by a borough-wide Article 4 Direction for HMOs that put in place controls on the conversion of dwellings to small HMOs.

5. Housing Standards

5.1.1 Although there is no direct evidence relating to HMOs, through gathering information and data to support its licensing schemes Redbridge Council has produced mounting evidence of poor management and unsafe housing conditions in the PRS. The tenure intelligent model (TIM) introduced by Property Licensing shows that there are 18,000 properties with one or more category 1 hazards, 10,000 of which are within the area designated for selective licensing (selective scheme 2) – many of these properties are in wards where there are the highest concentration of PRS properties and HMOs. The evidence base shows that the PRS in Redbridge has the greatest number of health and safety hazards, - an analysis of 1,000 service requests received by the Housing Standards Team in 2017 showed that many vulnerable adults and children are living in overcrowded and dangerous conditions. There is a strong correlation between PRS properties,

including HMOs, and poor housing conditions as identified through Housing Standards service requests.

- 5.1.2 Every ward in the borough has evidence of overcrowding in the PRS above the national average (4.5%⁵ of all 23.4m households in England and Wales). Overcrowding in Redbridge averages 10.8% of all homes, with 2.2% severely overcrowded; census data shows that homes in the PRS are more than three times as likely to be overcrowded as those that are owner occupied. As a significant proportion of the PRS many of these homes are likely to be HMOs. There are currently 3,760 residents on the housing register as a result of overcrowding and over 80% of them live in the PRS, many are likely to be in HMOs.
- 5.1.3 This increased number of people in properties generates more noise and refuse which in turn causes concern among neighbours. Overcrowding in the PRS is particularly acute in wards identified as having high levels of private rental households (see table 8 below). The Council is intent on a more proactive approach to tackling this issue that requires additional controls, including a coordinated approach between licensing and planning in order to help improve conditions for PRS tenants. A borough-wide Article 4 Direction for small HMOs is part of that proactive approach.

6. **Community Concerns**

- 6.1.1 Redbridge Council received a petition from local residents on 16 March 2017 with 180 signatures that sought a full investigation into planning issues associated with HMOs. Members discussed the petition at Overview Committee on 18 May 2017. The main issues highlighted in the petition included:
- Confusion in the Council over the identification of large HMOs
 - Illegal HMOs
 - Legal HMOs – procedures for Planning Contravention Notices
 - Concentration of HMOs
 - Building and construction safety
 - Fire hazards, health and sanitation
 - Parking
- 6.1.2 The increase in HMOs in an area can also result in a transient population and residents not getting to know their neighbours. Tenants may not have investment in the property / area in the same way as if they owned the property which could result in reduced community spirit.
- 6.1.3 Other issues on roads where there are suspected HMO's include missing information from the electoral register, some HMOs with only one person listed and little or no Council Tax collected although there is a significant service requirement such as waste services.

⁵ Census 2011

- 6.1.4 Other issues and concerns conveyed to the Council from residents in South Ilford related to the condition that HMOs are kept in; sub-renting; the cost of services provided by the Council; parking issues, such as crossing footpaths to park in front gardens where there is no pavement crossover.
- 6.1.5 Residents have also been concerned about the response from the Council in terms of enforcing regulations for which they have reported mixed views to Members. It was agreed that the Council should be more proactive when dealing with concerns raised by residents.

7. Need for family housing and demand for HMOs

- 7.1.1 Redbridge Council's Strategic Housing Market Assessment (2016) states a need in the borough for larger family units in the market and affordable housing sectors as part of the borough's objectively assessed need, up to 2033. There is a need for 2-bedroom houses but a particular demand for 3 and 4-bedroom houses. For market housing the overall need for the period 2011-2033 is 31,500 units, 26,200 of which are 3 and 4-bedroom properties; and for affordable housing the overall need is 15,300 units, of which 3 and 4-bedroom houses number 9,400 homes.
- 7.1.2 This level of demand for family dwellings in market and affordable housing reflects the borough's pressing need for large, single household properties in all sectors, including those in the privately rented sector (PRS). This acute need is exacerbated where the growth trends for owner occupation and social housing are being outstripped by the growth of the PRS (see table 2 above), of which up to 50% are HMOs. Properties in the PRS are being converted to HMOs at a rate that erodes efforts to meet the burgeoning need for larger family dwellings in Redbridge.
- 7.1.3 Like the rest of London, demand for social housing in Redbridge is very high. The number of applicants registered and waiting for allocation of permanent accommodation is bigger than the Council's housing stock, and dwarfs the number of homes let each year. The chart below⁶ gives a snapshot of the availability of homes in Redbridge. It shows the total number of applicants on the housing register and the total number of lets for the last financial year which includes Housing Association properties. The PRS could help to address this situation if fewer private rental properties were converted to HMOs, but this is a housing market trend that the Council does not control, fueled by migration and a dearth of affordable housing development.
- 7.1.4 However, the Council can further manage the housing standard and condition of HMOs, making them more acceptable types of accommodation whilst mitigating their social and environment impacts, by introducing a borough-wide Article 4 Direction for small HMOs.. Considering that the trend towards an increase in the PRS and HMOs in Redbridge will continue there is a pressing need for the Council to act and implement this measure to bring about the full use of Council powers through Licensing and

⁶ Taken from Redbridge Council Housing webpage

Planning regulation. This will also bring the Council in line with the approach of its neighbouring boroughs.

Fig 4: Council housing stock, registers and lettings for 2017



8. Conclusions

- 8.1.1. The private rental sector (PRS) and HMOs have an important role in housing provision in London and in Redbridge. However, some areas have higher concentrations of HMO's with some being poorly managed which may lead to social and environmental problems within the community. Evidence suggests that the PRS consists of up to 50% of HMOs in Redbridge, which has experienced a significant rise in PRS properties since 2001 from 13,446 to up to 35,659 in 2018 - an increase of around 265%. In the south of the borough some wards consist of as much as 30-45% privately rented properties, indicating a very high conversion rate of large single-family dwellings - HMOs were estimated to number 11,250 in 2014. These trends are likely to continue as the borough experiences sharp population increases and an acute lack of affordable housing. Considering the above it is reasonable to assume that because HMOs make up a significant proportion of the PRS there are very large numbers in the borough, which are likely to continue to increase going forward.

Article 4 Directions for small HMOs have been in place in neighbouring boroughs since 2013, including Barking & Dagenham, Havering, Newham and Waltham Forest. Within this time the PRS has increased in the borough by around 141.5%, and it is possible that the Article 4 Directions in these boroughs may have contributed to this sharp rise.

- 8.1.2. Mapping exercises show that there are concentrations of HMO in certain wards, but also that there are large numbers borough-wide. However, the mapping shows only a fraction of the estimated number of HMOs in the borough. The article 4 will help to readdress the balance of the tenure make-up of the borough.
- 8.1.3. The concerns of the community also offer first hand evidence of the problems that poorly managed HMOs can cause. The submission of petitions and the large number of strong concerns conveyed to Members make it clear that there are genuine problems where there are large concentration of HMOs are those which are poorly managed. An article 4 direction will ensure the Council can better control the numbers and ensure HMO are in the right locations within the borough.
- 8.1.4. With regard to anti-social behaviour (ASB) and crime in Redbridge previous studies have made links between the PRS and HMOs. The mapped data illustrate a connection between the number of ASB complaints including noise nuisance and fly-tipping, and how they correlate with areas known to have high numbers of PRS and HMO properties. . The links between PRS/HMO properties and ASB made in previous studies, supported by the newly mapped data, makes a strong case in terms of demonstrating that such properties can cause social and environmental problems where they are not properly managed.
- 8.1.5. Unrestricted conversion of family houses to small HMOs is causing harm by creating communities within which there is a lack of balance in housing mix, and placing additional housing pressure on existing family housing through unrestricted conversions and resulting in poor standards of accommodation. These effects are contrary to the Council's own planning policy objective which is to protect existing family stock whilst ensuring diversity of type, size and tenure of housing, including affordable housing to meet local needs.
- 8.1.6. Finally, the introduction of the Article 4 Direction will allow the Council to assess and consider planning proposals for such uses, thereby promoting well managed stock within the private rented sector. The Planning Service has drafted new housing design guidance supplementary planning document (SPD) to replace the 2012 householder design guide, and this will be published for public consultation in the early part of 2019. The new SPD contains a section advising developers on what the Council expects with regard to planning applications for small HMOs, and it sets out criteria under which proposals will be considered. It will ensure that proposals for small HMOs do not result in a significant loss of local character or amenity from increased traffic, noise or general disturbance. All applications will be required to submit a management plan for the property; should respect the local character of the area; include design and safety measures that minimise crime and help avoid antisocial behaviour; create safe and secure environments; and provide acceptable standards of accommodation in terms of the quality of internal space and provision of external private and communal amenity space.