

Housing conditions including review of housing conditions

Review of Housing Conditions under Section 3(1) of the Housing Act 2004

Introduction

This review is based on field work carried out between August 2018 and June 2019 followed by a comprehensive analysis of Council and Government data by a company called Metastreet. They use this data to provide up to date tenure intelligence. Machine learning is used to generate predictive statistical models showing tenure and trends at the property level. This includes the probability of Category 1 hazards as defined by the Housing Health and Safety Rating System (HHSRS)

During field work, in addition to dealing with routine complaints and enquiries the Selective Licensing Inspection Team targeted specific geographical areas around the borough. This programme was intensified as a result of funding from MCHLG as part of the Rogue Landlords Enforcement Grant initiative.

An inspection form was designed so that the following items of information could be collected:-

- Ownership, management, and tenant details
- Compliance with licencing conditions
- Presence of Category 1 and Category 2 hazards
- Rent levels and income levels
- Whether affected by ill health, disability, or ASB.

The inspection programme was not a classical house condition survey as each inspection is a triage and appropriate action must be taken by the inspectors when required. This slowed down the rate of inspections considerably compared to a standard house condition survey whereby everything is anonymous and surveyors only pass on findings in exceptional circumstances.

Prior to the Housing Review Inspection Programme

The current selective licensing scheme began in October 2015. The initial aim was to inspect every property which had been issued a licence. However, the number of applications was much larger than had been expected so the methodology was developed of contacting those landlords and agents with the largest number of licences so that multiple inspections could be arranged. This enabled the maximum number of inspections but after 2½ years, exactly half way through the 5 year scheme, 5,734 properties had been inspected, 18% of the number licenced at the time.

By adopting a maximum numbers approach the net effect was to target the more cooperative landlords rather than potential rogue landlords. Even so, 1,544 properties were found to be unsatisfactory and requiring enforcement action. Although most enforcement was informal it is significant that 27% of properties run by cooperative agents and landlords were not up to standard and would have remained so without Council intervention.

Following the Grenfell fire in June 2017 much more attention began to be paid to tower blocks. In Croydon, there are a large (and increasing) number of high rise buildings which are occupied by high percentages of private tenants. A policy decision was made to inspect all privately rented high rise flats. This also diverted attention from rogue landlords.

In early 2018 it was decided to change the approach towards targeting areas of privately rented property with known problems associated with ASB and environmental problems. This involved the design of new inspection forms which could be uploaded for data processing. This together with staff recruitment and training meant that in summer 2018 a pilot area was chosen for intensive survey.

For the staff this was an entirely new way of working and time was needed to accumulate the necessary experience. A review of the back office functions was also found to be needed and appropriate changes were made.

It became clear that there were a lot of properties which should be licenced but were not. Also, in many cases there were multiple problems which could only be dealt with by a multi-agency approach.

At the end of 2018 it was decided to carry out a review of the private rented housing stock and then make any necessary changes to the Council's approach to selective licensing and enforcement policies.

The Housing Review Inspection Programme

The decision to carry out a review coincided with the availability of funds from MHCLG under the Rogue Landlord Enforcement Grant programme.

It was decided to target the inspection programme towards localities identified in the Council's Local Plan (Croydon Local Plan 2018). The Local Plan described a total of 98 centres many of which comprise neighbourhood shopping parades. Consequently there were a high number of flats over shops.

More than 20 such areas of varying sizes were targeted. Properties were called on without an appointment. A letter explaining the inspection was left and at least three attempts were made to gain access. No formal methods were used to obtain entry. All addresses in the area received a letter and as many addresses as possible were called at. Where access was not gained inspectors were instructed to obtain credible intelligence about whether or not a property was privately rented.

Tenure	Count
Licensable	1,228
No information	141
Owner-Occupied	104
Exempt	17
Short Term vacant	10
Long Term Vacant	1
Licensable but not licenced	9%*

*Minimum number as not all have been fully checked in the office.

Crowding

Crowding, as opposed to overcrowding is one of the hazards included in the HHSRS.

From the HHSRS Operational Guidance Issued by the Government

Crowding covers hazards associated with lack of space within the dwelling for living, sleeping and normal family/household life... People who live in crowded conditions also tend to suffer multiple deprivation, and separating the effect of poverty from crowding is difficult... Lack of space and overcrowded conditions have been linked to a number of health outcomes, including psychological distress and mental disorders, especially those associated with a lack of privacy and childhood development. Crowding can result in... reduction of tolerance, and a reduction of the ability to concentrate... There should be sufficient space to provide for social interaction between members of the household, while allowing for private time away from other household members... Personal space and privacy needs are important for the individual members of the same household as well as for individuals or households sharing rooms and/or facilities. These needs vary reflecting both individual and cultural perceptions. Adolescents may need more space than the elderly. Small children need at least as much space as an adult. The need for privacy begins to develop from the age of eight and will be fully formed during puberty.

The map below shows the distribution of households comprising more than two people where there were more than one person per room.

Over the past 12 months 30% of properties which were inspected and where more than two people lived had an occupancy rate of more than one person per room.

Housing Stress

As part of the inspection tenants were asked how much rent they paid and how much income they had. While these questions were often not answered it was clear that there was usually a substantial mismatch between rent levels and the Local Housing Allowance. The situation was worse for larger families.

Dampness and Mould

This hazard is also usually an indicator of deprivation as it relates to affordable warmth. All rented property should have an Energy Performance Certificate (EPC). The Government has recently made it mandatory that an EPC rating should be at least E; the Minimum Energy Efficiency Standard.