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**Review of Licensing of Houses in Multiple Occupation
2020.**

Purpose

The purpose of this paper is to provide the findings of a review carried out on the Houses in Multiple Occupation (HMO) Licensing Scheme in operation in Oxford since 2016. Previous to this, the Council produced a similar report reviewing the HMO licensing scheme which was in operation since 2011. This review fulfils the responsibility under the legislation that, ‘*a local housing authority must from time to time review the operation of any designation made by them*’ but also provides the Council with a ‘snapshot’ of progress which will be used as a platform when considering the future renewal of the scheme.

Background

Since the introduction of citywide HMO licensing in 2011 the Private Rented Sector (PRS) has continued to grow, with an estimated 33% of the stock being privately rented¹. The private rented sector is often associated with the younger population although it also houses the more vulnerable in society.

A number of market factors such as high house prices, high demand and an increased population have resulted in an increased growth of HMOs with the current predictions suggesting there are now circa 6,900 HMOs.

The council have always been clear that Additional HMO Licensing in Oxford will be used to improve the HMO stock in the city, this continues to be a significant undertaking by the Council.

The overall purpose of the licensing scheme remains the same as it was when it was first introduced in 2011 that is to: ***‘alleviate the housing situation by setting and maintaining minimum standards across the city in the most vulnerable sector of Oxfords private rental market’***.

This is also major contributing factor to the Councils Corporate aim to “Deliver more affordable housing” by improving conditions in the Private Rented Sector in the city.

Key Outcomes

Listed below are some of the key outcomes from the review and the scheme, with further details provided in the Supporting Information section of the report.

- **Implementation of a new Fee Structure** - Following feedback from landlords and agents, during the consultation phase for the current additional HMO licensing scheme a new fee structure for HMO licensing was introduced. This was to enable the Council to concentrate on non-compliant landlords.
A compliant landlord who applied for a new licence in 2016 would have paid £707 licence fee for the length of the scheme or £307 for a renewal of a licence if the HMO was licensed under the previous scheme. A non-compliant landlord would have paid £2706 in licence fees for a new licence or £2,064 for a renewal licence in the same period.
- **Amenities and Facilities guide** – Following public consultation, a revised guidance document for HMOs was published in 2019. This outlines what the Council expects to see in HMOs in the city.
- **12,236 licences issued** over the length of the scheme relating to 3,850 properties.
- **2439**, 2 year licences and **826**, 5 year licences have been issued to compliant landlords
- Over **1,000 visits per year** are made to licensed HMOs to monitor compliance with the scheme
- The Council have received **5,392** service requests relating to HMOs of these **1,921** concerned HMOs subject to additional licensing
- **233,998** mandatory and non-standard conditions have been attached to HMO licences.
- **21,071** nonstandard conditions have been applied to deal with a HMOs below the minimum standards, with **6,795 relating to fire safety** and **11,084 relating to management and maintenance**
- An **estimated £9.327M** has been invested in the HMO stock by landlords to bring about improvements and maintenance to comply with the scheme.
- **53%** of HMOs requiring an additional licence do not comply with the scheme
- **2,460** cases relating to suspect HMOs have been investigated and 54 financial penalties have been served for operating a HMO without a licence.

Supporting Information

The National Picture

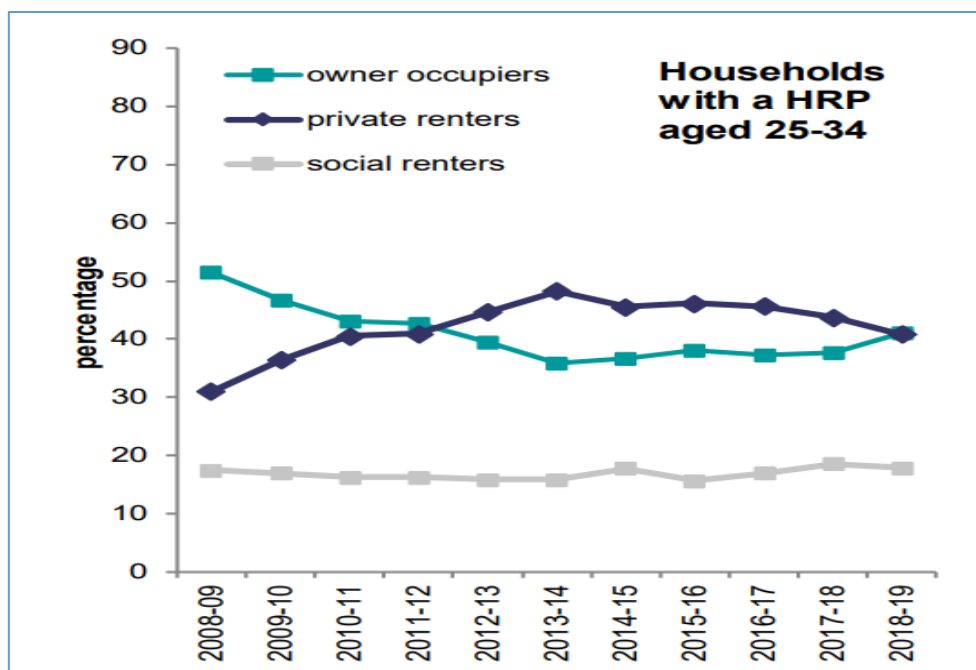
The Office for National Statistics projections indicates that there will be a population increase in the UK by 11 million over the next two decades. People are growing older and living longer. It is estimated that over the next 2 years the over 65's will increase by 7 million

The English Housing Survey 2017-18 (EHS)¹ reported, that there were 23.9 million homes in England, 20% were privately rented.

In recent data from the EHS 2018 -19² report the proportion of 25-34 year olds living in the PRS has levelled at around 41%. This value when compared to the previous decade has shown high growth as the number of 25-34 year olds living in the PRS has significantly increased from 28%. This increase has come at the expense of a drop in the number of owner occupiers for this age bracket down from 55% to 38%. As there is no real change in the number of 25-34s entering the social rented sector the decline in home ownership has directly translated into more renters for this age bracket. Considering the youthful demography of the city this particular age group makes up a significant proportion of the population at 30,000 residents or approximately 20% of the overall population (Census, 2011). When this bracket is opened up to include 20 to 24 year olds to represent the typical age of undergraduate students this proportion rises to cover 35% of the city.

The table of results, from the EHS 2018-19, below shows where the majority of 25- to 34-year-olds owned their own home in 2007-8, however those born just a decade later are now far more likely to be renting from a landlord. As can be seen the 'tipping point' appears to be between 2011 and 2012.

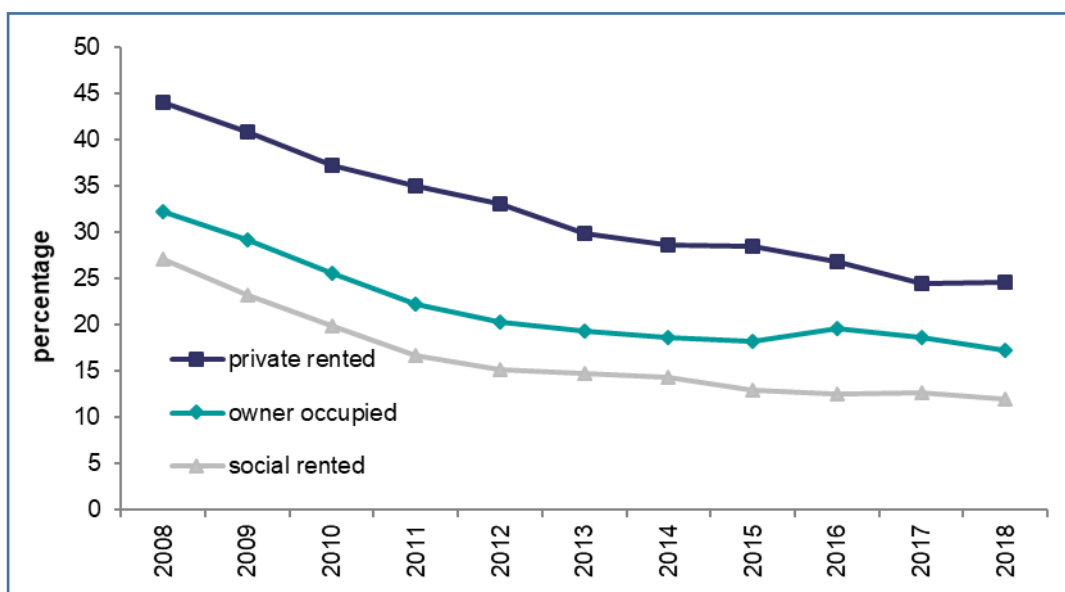
Figure 1 – Tenure profile for 25-34 year olds (EHS 2018-19)



Within the PRS over three quarters (76%) of renters were working, with 65% in fulltime work and 12% in part-time work. Smaller proportions of private renters were retired (8%), in full-time education (5%), or unemployed (3%)

Housing conditions within the PRS are poorer than that of social and owner occupied properties. Despite improvements over the years nearly 25% of properties in the PRS are considered “non-decent” and contain the highest percentage of category 1 hazards at 14%³.

Figure 2 – Percentage of “Non-Decent” properties by tenure (EHS 2008-18)



Nationally, the sector sees the greatest amount of turn over with 62% of households having lived at their address for less than three years⁴.

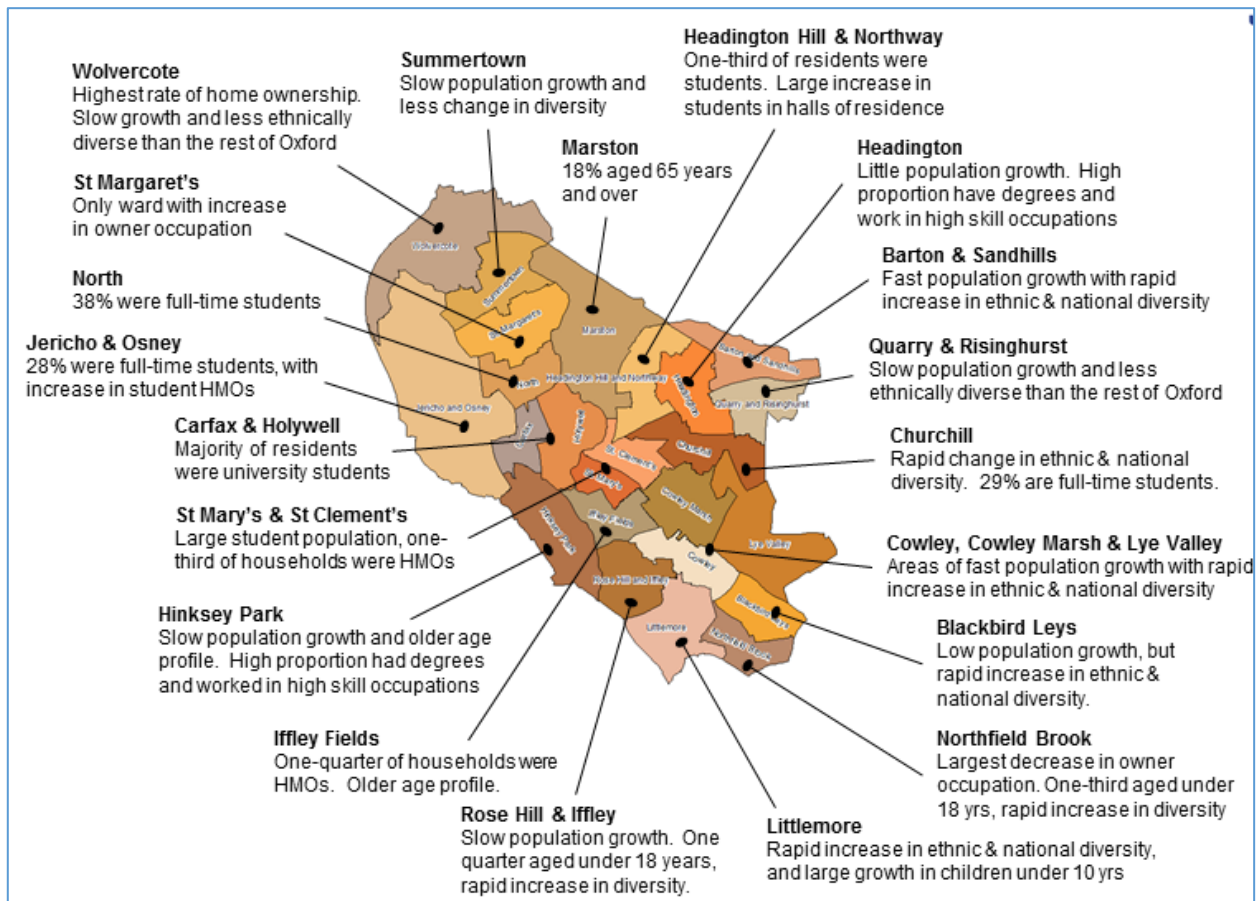
As a tenure there is little indication that the PRS will shrink in the near future with the EHS 2018-19 indicating that the percentage of PRS tenants looking to buy their own home is at its lowest point in the decade between 2008 and 2018 at 56%.

The Oxford Picture

Housing in Oxford faces enormous pressure as it has a growing population with the Office for National Statistics (ONS) midyear estimate in 2018 putting the population at 154,347 people. According to the ONS Oxford’s rate of population growth is set to steadily increase over the coming years, Oxford’s population growth is the 12th fastest in the UK, increasing by 15,000 residents each decade (OCC, 2014). However when using housing led forecasts produced by the Oxfordshire County Council which factor in additional housing market metrics, Oxford’s population is set to grow at rate prescribed higher than that of the ONS and is predicted to rise to 176,571 by 2026⁵.

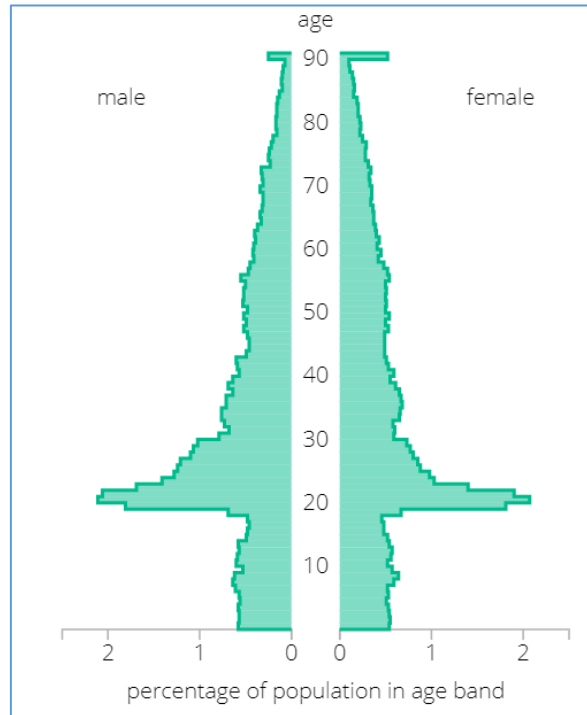
Oxford's population has increased by 12% in the last decade. Figure 3 below provides a snapshot of how this has impacted on the 24 different wards.

Figure 3 – Ward profiles



Oxford is a relatively young city in regards to the average age of occupants with a significant distribution of the population. According to Census data in 2011 34% of the population of Oxford is aged between 20-35 years. As shown in Figure 4, 33,640 of the city's population are enrolled between the two universities with a further 8,800 enrolled in part time study⁶.

Figure 4 – Distribution of population of Oxford by age (ONS 2011)



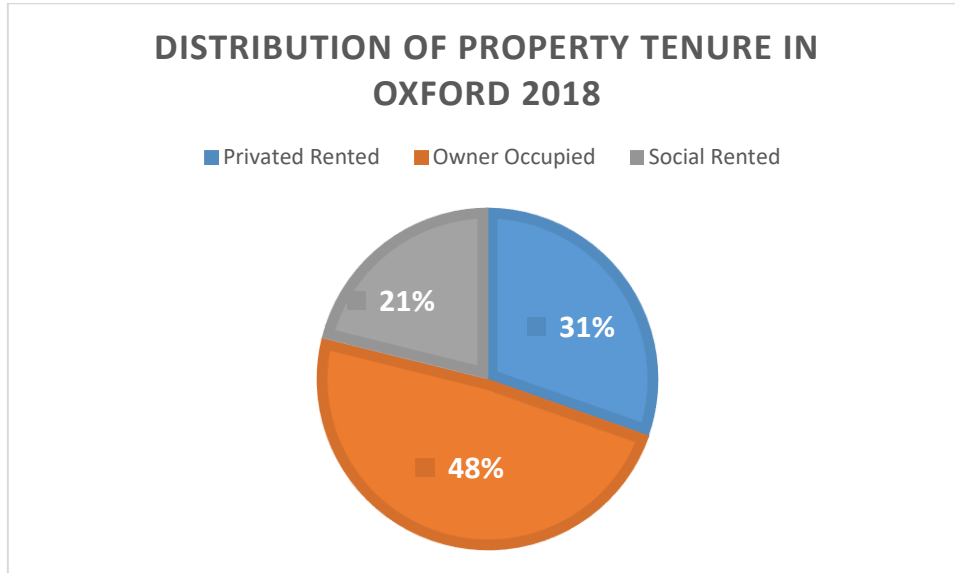
Socio-economic representation of the city is broad with both ends of the spectrum being found. While Oxford is often seen as wealthy city, an assumption which is supported by the average house prices, above average median income and high cost of living, there is a vast gulf between its residents as 10 of Oxford's 83 neighbourhood areas ('Super Output Areas') are among the 20% most deprived areas in England (IMD, 2019)⁷.

According to the Lloyds Banking Affordable Cities Review 2019 – Oxford has an average house price of £460,184, 12 times (12.6) average annual earnings in the city (£36,430) making Oxford the UK's least affordable city. High house prices create a situation where younger people and low income households are not able to access the owner occupation market leaving the Private Rented Sector (PRS) as the only viable option for accommodation.

Property tenure in Oxford City

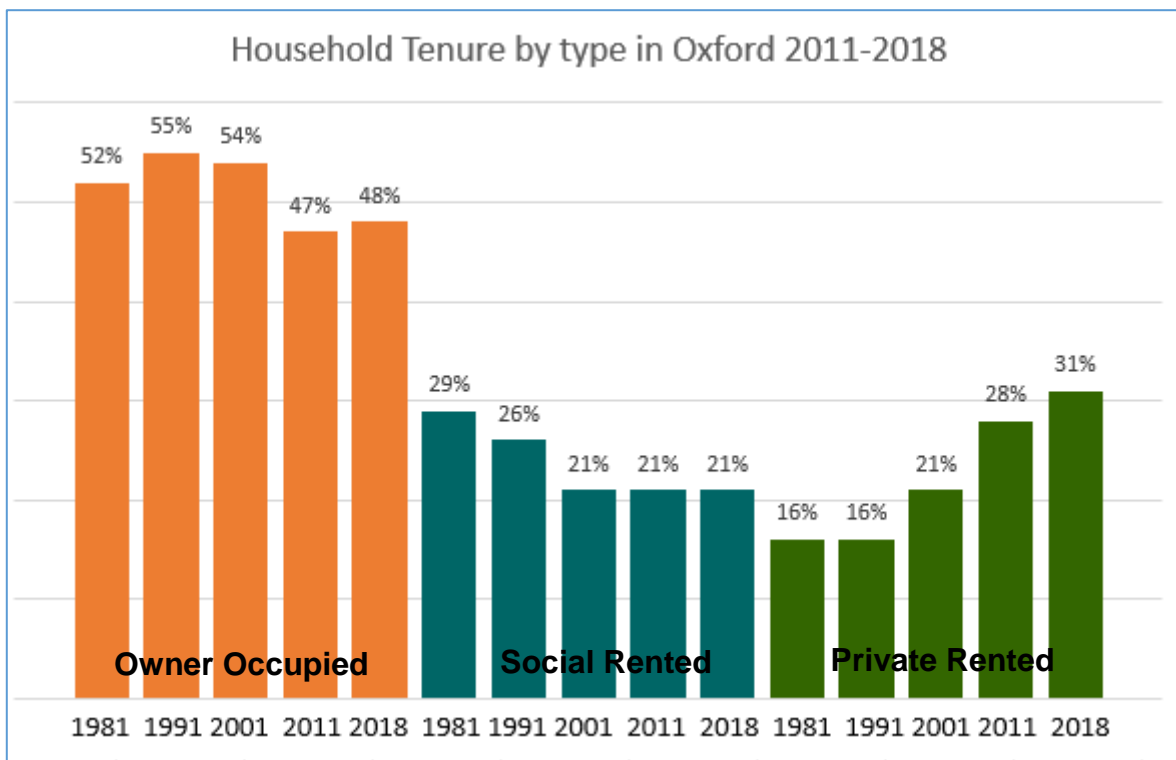
Nationally, 19.9% of properties are within the PRS but Oxford contains a significantly higher proportion of rented accommodation. Since 2011 this sector has seen growth from 28% whereas levels of home ownership have decreased slightly to represent 48% and Social Housing stock accounts for approximately 21%. As shown below in Figure 5 the PRS in Oxford represents 30.2%⁸ of the housing stock which is one the highest proportions of PRS in England based on an ONS report in 2018.

Figure 5 – Tenure profile in Oxford



This places the number of those who rent in the city greater than that of home owners. While the speed of growth in the sector has steadied in recent years it follows on from accelerated levels of growth in the PRS between the 2001 and 2011 at the expense of a shrinking number of owner occupiers.

Figure 6 – Tenure profile in Oxford over time



According to the ONS in 2018 there was an estimated 58,910 dwellings⁶ in the city, of which approximately 17,800 are contained in the PRS. HMOs represent 5,240 properties⁹ in the PRS and currently 4,100 of those are either licensed or in the process of being licensed. The difference between these two values is largely to be a result of a number of properties linked to tertiary education that are exempt from the current scheme. The proportion of the estimated HMO stock licensed by the city council has increased by 32% since during the current scheme. The stability in the overall number of estimated HMO properties is perhaps a reflection of increased links between HMO licensing and Article 4 planning functions to ensure that communities remain sustainable and cohesive by reflecting a number of tenure types.

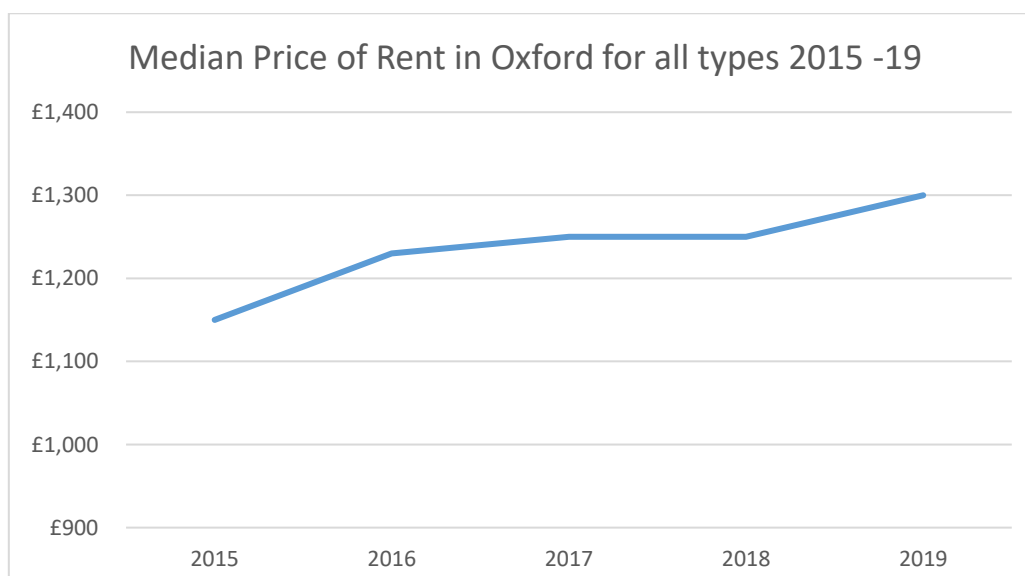
The city is also facing some of the more contemporary challenges of the housing market as some of the PRS has shifted into the short-term letting market. As many as 1,200 properties in Oxford may be listed on sites such as AirBnB which may be placing further pressures on the local housing market (OCC, 2018).

It is well known that Oxford has a long term housing shortage where demand is high and availability is low, this housing market provides an opportunity for landlords to offer less than perfect accommodation without any problems of finding a suitable tenant. Along with this, tenants often do not complain regarding conditions for fear of losing their accommodation through retaliatory eviction.

Rent

Housing in Oxford is an expensive proposition, as the city has some of the highest median rental values for properties of all sizes. The South East region of England is home to some of the more expensive private rental markets and this is reflected by median rents measuring 26% higher than the median value for all of England. Since 2015 rent has increased by 13% with median cost of renting a home costing £1,300¹⁰. Figure 7 below shows the movement of rental prices between 2015 and 2019. Although the cost of rent has continued to rise, the rate of increase is slower than that during the period prior to the initial Additional HMO Licensing Scheme.

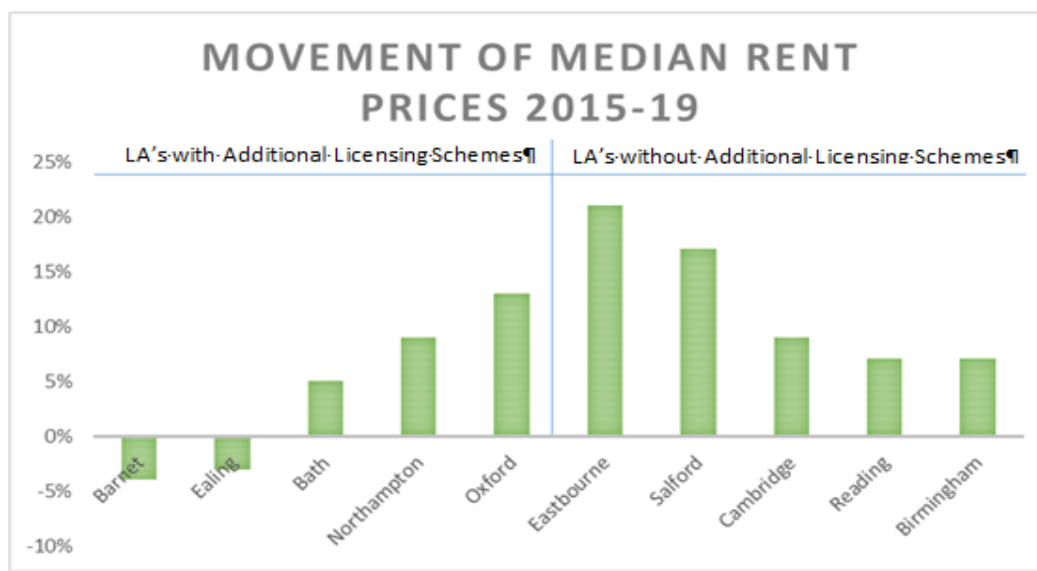
Figure 7 – Tenure profile in Oxford over time



Affordability of housing in Oxford is not likely to greatly improve in the near future as the lack of available land for development and high land values will maintain high property values. This is reflected in the reduction of homeownership and corresponds with increases in the cost of rent due to a higher demand placed on a growing rental market.

When looking across authorities there is no consistent theme of increased rent due to a licensing scheme operating within that area. In fact, several authorities have seen the cost of rent decrease despite the operation of an Additional and Selective licensing scheme. The cost of housing is a complex issue that is dependent on a number of variables and to attribute levels of rent solely on the existence of licensing schemes would be an oversimplification. See figure 8 below

Figure 8 – Comparison of Rents in Areas with and without Licensing



HMOs

HMOs provide a significant amount of accommodation in Oxford and form an important and valuable part of the Housing market. However the conditions and practices associated with them have caused concerns over a number of years. It is estimated that Oxford has one of the highest number of HMOs in England and Wales. Only the large metropolitan and unitary authorities and some London Boroughs contain more.

HMOs form an unusually high percentage of houses in the city and it is estimated that 1 in 5 of the resident population live within one, with the trend over many years being for the HMO stock to grow steadily within the City. Data from the Census 2011 suggested that HMOs currently make up 44% of the PRS, however a number of these are exempt from HMO licensing.

Planning and licensing - Since the introduction of an Article 4 Direction, which withdrew the permitted development right to change single family dwelling houses to small (C4 use class) HMOs, the growth of HMOs in key hotspot areas has been controlled via the planning process as permission will not be granted if more than 20% of the properties in a 100m area are HMOs. Whilst there is separate legislation that applies to the planning status of a HMO, the licensing process has ensured that HMO licence applicants are advised about planning requirements to operate within the law. See Table 1

Oxford has a large student population who typically live in HMOs throughout the city. Whilst there is a planning policy requiring the Universities to have no more than 3,000 students living outside of university provided accommodation, in the last year of monitoring by the city council there were 6,782 students with accommodation needs outside of university provided accommodation, since the start of the scheme 2,948 rooms have been provided by the universities.

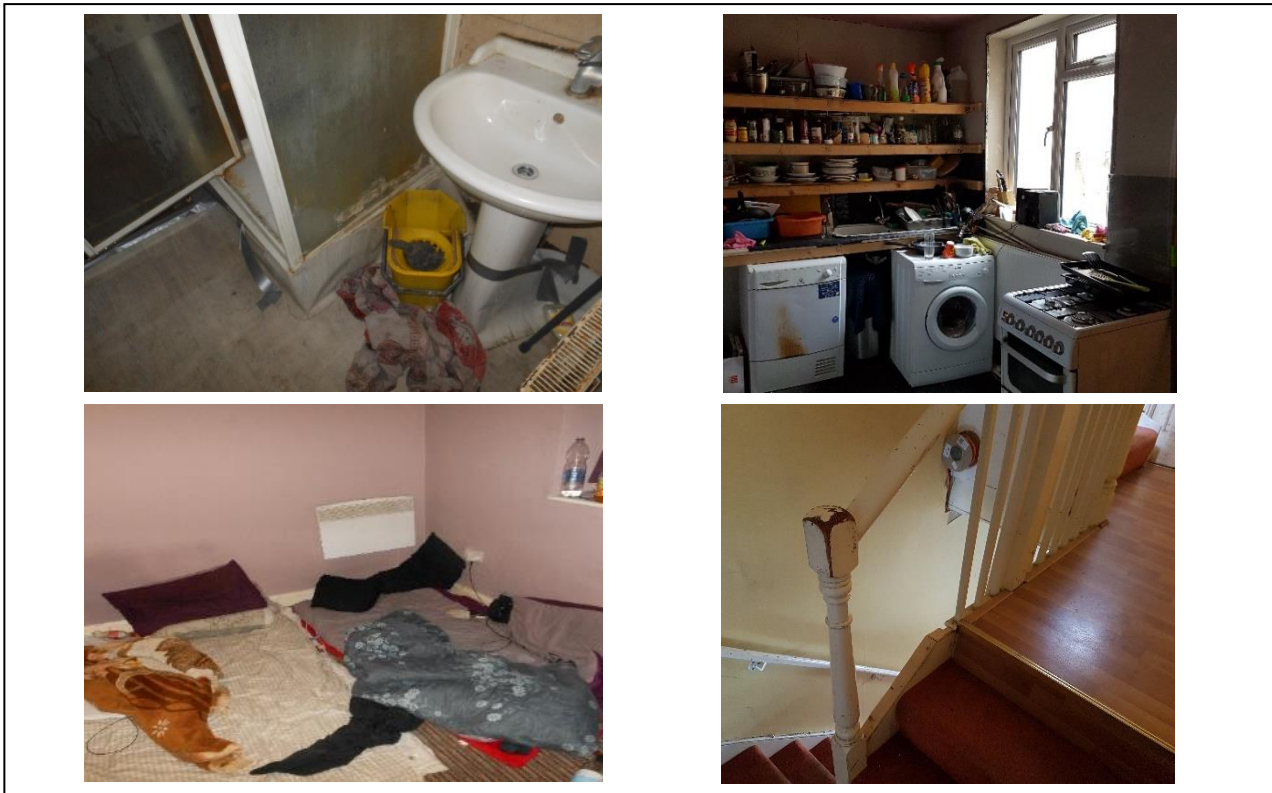
Table 1 – Planning Applications and Approvals

Year	Applications for change of use to HMO	Approvals for change of use to HMO
15/16	96	78
16/17	119	92
17/18	112	93
18/19	62	62

Living Conditions

The problems associated with living in a HMO have been well documented over the years and are well known to professionals working in the sector. Whilst it is clear that there have been improvements made to HMOs; the experience over the years, in Oxford, is that some of the worst conditions continue to be present in HMOs, especially those found lacking a HMO licence. The photographs below depict some of the conditions recently found within HMOs.

Figure 9 – Examples of Poor Conditions within HMO properties.

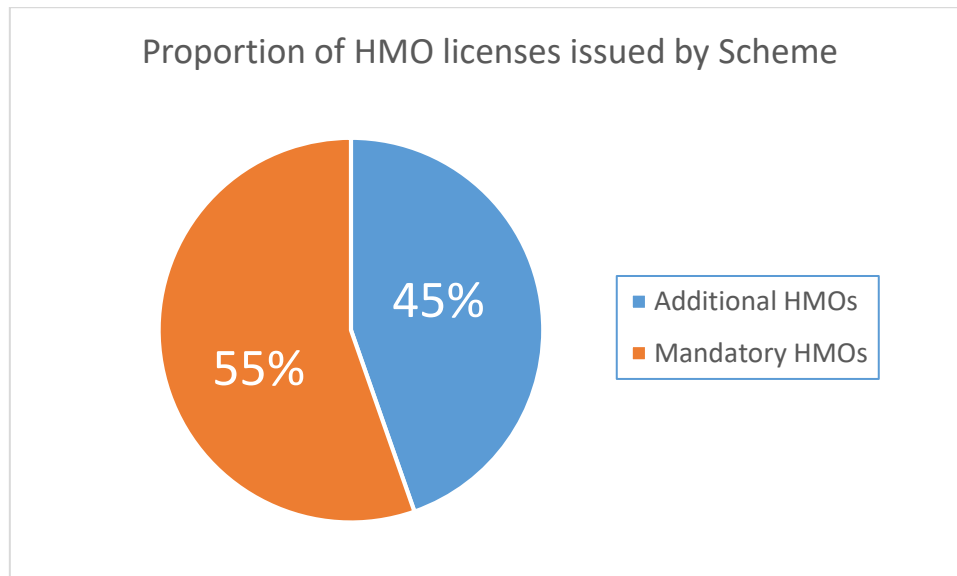


Licensing of HMOs

Mandatory Licensing of HMOs was introduced by the Housing Act 2004, initially HMOs only required a licence if they were 3 or more storeys in height with 5 or more unrelated occupiers sharing facilities. In October 2018 legislation was introduced to ensure that any property, occupied by 5 or more persons regardless of the number of storeys required a HMO licence. It is estimated that only 55% of the licensable HMO stock in the city would be subject to mandatory HMO licensing i.e. those HMOs with 5 or more occupiers.

The Council introduced a city wide HMO licensing scheme in 2011, this was implemented in two phases with all HMOs being subject to licensing as from January 2012, this scheme was renewed in January 2016. The council have always taken a robust approach to HMO licensing and has always maintained that a HMO licence is not “just a piece of paper “. HMO licensing has been used to upgrade each property to a decent standard with all licences being issued ***after an inspection*** of the HMO. This enables the Council to have a positive impact on the condition and management of approximately 4,400 properties

Figure 10 – Proportion of issued HMO licenses by Scheme



HMO licensing in Oxford is both a reactive and a proactive service, with property inspections being integral to the licensing process both initially and to check compliance. The council also investigates service requests from HMO occupiers and neighbours as well as providing help and assistance to landlords. The council investigates cases where HMOs are suspected of operating without a HMO licence, when such cases are identified a robust approach is always taken with a number of cases resulting in the landlord receiving a financial penalty.

The Council continues to take the preferred stance of applying licensing to *all* HMOs in the same way, for example that licensing applies to *all* taxis. City wide additional HMO licensing allows the Council the opportunity to make this a reality. Similar regulatory schemes apply to food businesses in the city regardless of the size of the business giving the public confidence in such businesses irrespective of their size, likewise the size of a HMO should not dictate the standards that tenants can expect.

During the current scheme a revised fee structure has been introduced, this has enabled landlords who are managing their properties to a good standard a longer licence. The growth in these licences indicates that improvements are being made to the HMO stock through the additional licensing scheme.

Processing HMO Applications

The landlord/owner has the responsibility for submitting a valid application for a HMO licence, however the council has found that even after a number of years of licensing operating in the city, reminders need to be sent to ensure that renewals are made in a timely manner so as to ensure landlords are not operating without a licence.

Since the start of the scheme in 2016, there has been on average 2,518 HMO licence applications per year. However, whilst all renewal applicants receive a reminder to renew, there remains a number (13%) who require further reminders to submit their valid application.

Since the introduction of the licensing scheme in Oxford, HMO properties have only been issued a licence following a full inspection. These initial inspections ensure that one of the critical aims of the scheme, to improve HMO stock conditions, is being met. As a part of the application process, inspections inform licence conditions with time scales set for completion proportional to the health and safety risk to the occupants. A licence is then issued for one year to ensure the landlord completes any required work and complies with standard conditions, such as sending in the gas safety certificate annually. During this year, further inspections are then made to check compliance with the conditions set on each licence. In recent years the council has encouraged the submission of photographic evidence of completed works where appropriate to increase the efficiency of the overall process. Whenever an initial inspection or compliance inspection is made this arranged by prior appointment to ensure that time is not wasted through lack of access to the property.

When renewal applications are received for existing HMO properties a decision is made as to whether or not the landlord has demonstrated compliance. If not, the landlord is restricted to a one year licence and will likely incur the higher renewal fee.

Licence conditions

Each HMO licence is granted with conditions. There are a number of conditions which must be included with every HMO licence granted, these include conditions relating to such matters as gas safety, electrical appliances, furniture, smoke alarms and details of the occupants. Since October 2018 all licences have also been required to include conditions regarding minimum room sizes and waste disposal. These are applied by all Councils across England and Wales and are often referred to as the 'mandatory conditions'.

The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 Schedule 3 sets out the prescribed standards (minimum standards) for HMOs. The Council has an adopted Amenity and Facility Guide to expand on the prescribed standards and outlines what the council considers as appropriate and necessary facilities. This guide was reviewed in 2018, in consultation with landlords and agents with the latest version published in 2019. A guide ensures consistent standards and allows landlords, agents and tenants to understand the standards they can expect in HMOs. Decisions regarding deviations from the prescribed guidance are made on a case by case basis.

During 2015 to 2019 the Council included, on average, 18 standard conditions to every licence. These comprise of the mandatory conditions the Council must include and a number of standard "discretionary" conditions are added to ensure good management of HMOs. As part of this review, the "standard discretionary" conditions applied by the council have been benchmarked with other authorities. This is to ensure that the "standard discretionary" conditions applied are generally consistent with other local authorities. The outcome of this exercise can be seen in Appendix 1

In addition, the Council also included (non-standard) discretionary conditions which covered three broad areas relating to HMOs. Of the total number of licences issued for this period, 4622 licences required non- standard discretionary conditions which equates to 38% of licences issued. See figure 10 for a breakdown of the types of conditions.

Figure 10 – Category of Non-Standard conditions included on HMO licences

Fire Safety Conditions – these are specifically over and above the mandatory conditions and would include such matter as fire separation, additional detection and providing fire safety equipment etc.



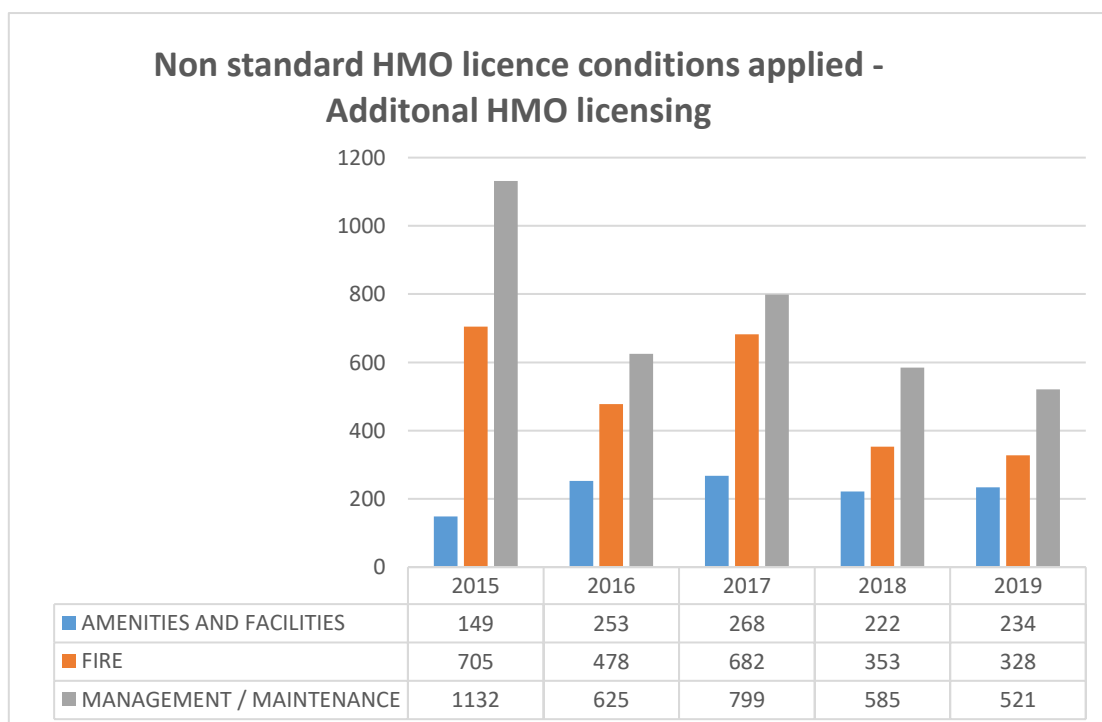
Amenities and Facilities Conditions – these conditions relate to cases where there are insufficient or not enough facilities or amenities present within the property for the number of people living there. This typically includes providing amenities such as kitchens or bathrooms and facilities within those elements. These conditions are set in relation to the Council's Amenities and Facilities Guide



Management and Maintenance Conditions – These cover disrepair and issues relating to the management of the HMO, which may not be Category 1 hazards and can therefore be addressed via the licensing process



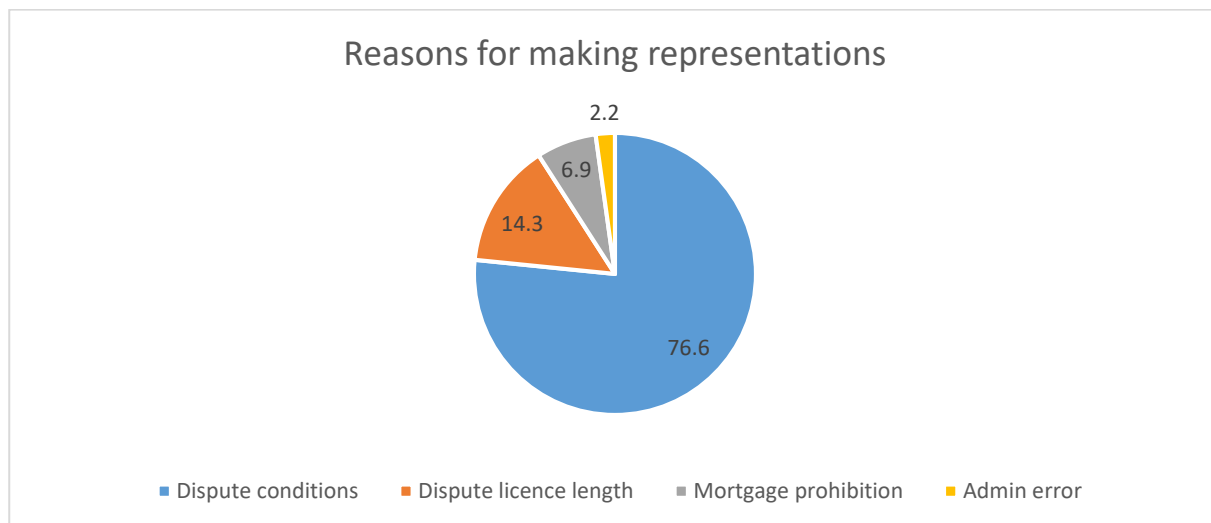
Figure 11 – Number of Non-Standard conditions included on additional HMO licences



Over the period of the HMO licensing scheme the numbers of conditions applied has reduced which indicates an improved compliance with the HMO licensing scheme. However the compliance rate, i.e. the number of non-standard conditions complied with on re-inspection, is still only 49% which means for every 10 licensed HMOs re-inspected, 5 are non-compliant. For properties with Additional HMO licences the rate of non-compliance increases to 53%.

Applicants can make representations to the council concerning the conditions that are proposed to be applied to a HMO licence before it is granted. Over the period 2015 to 2019, representations were received in relation to 449 licences which equates to 3.7% of total number of licences issued. This shows that the vast majority of landlords (96.3%) are happy with the proposed licence conditions. The reasons for making a representation can be seen in Figure 12:

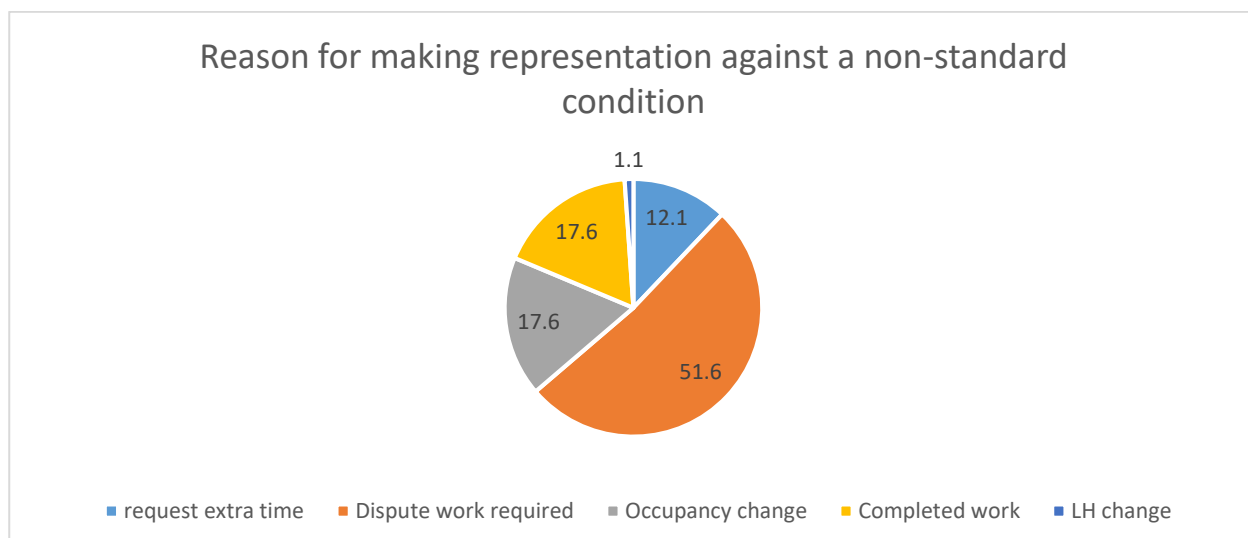
Figure 12 – Reason for making a representation regarding HMO licence



Representations relating to lack of mortgage permission for letting / HMO use are always rejected because this is considered to be outside of the HMO licensing regime. Representations relating to administrative errors are always accepted. Looking at representations received relating to licence length, 51.6% of representations are accepted demonstrating we are generally fair with our decisions relating to licence length.

Representations relating to the addition of non-standard conditions equate to 7.4% of licences with non-standard conditions added. A 25% sample was analysed to extract the representation reason.

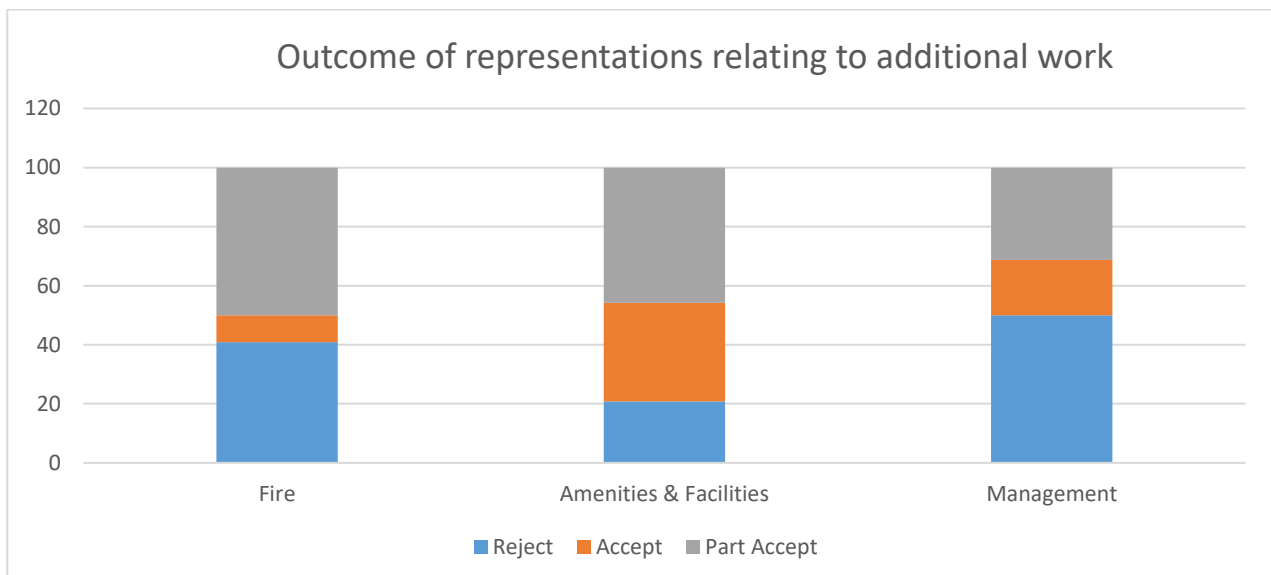
Figure 13 – Reason for making a representation against a non-standard condition



Occupancy changes, completion of work and extra time were accepted in all cases. The change of licence holder was rejected in these cases. Therefore, representations objecting to having to undertake additional work occurs in only 1% of licences with non-standard discretionary conditions demonstrating that landlords generally do not object to undertaking work and the council is fair and reasonable in the work required.

When looking at the representations by additional work type, it is work relating to provision of amenities and facilities that leads to the most representations, followed by fire and then management / maintenance. The outcome of these representations is shown in Figure 14 and there are slight differences dependent on work type. It is apparent that overall, in 62.8% of cases we either fully accept or part accept (that is, compromise is reached) the representations demonstrating the council considers the landlords' point of view.

Figure 14 – Outcome of representations relating to additional work

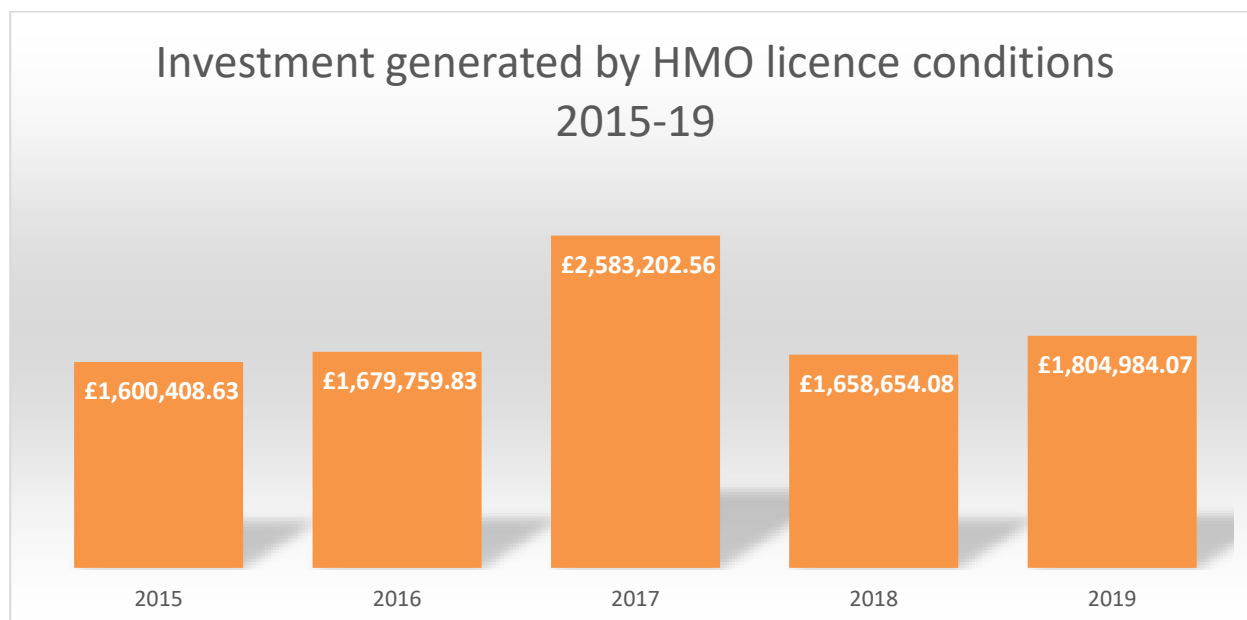


If a landlord is not happy with the conditions attached to the licence, they have a right of appeal to the First-tier Tribunal. Between 2015 to 2019, only 7 appeals were made to the First-tier Tribunal equating to 0.2% of licences with non-standard conditions.

Investment in the HMO stock

It is clear from the rate of compliance over the existing scheme that landlords are continuing to invest in the HMO stock; Figure 15 below shows an estimate of the amount per year based on the conditions applied to HMO licences. In total this amounts to £9.327M over the scheme or £1.865M per year for the 2,500 HMO licences issued, equating to an average investment per licence of £746.00

Figure 15 – Potential economic investment generated by HMO licence conditions



HMO related Service requests

The council have received 29,433 service requests since 2015 concerning regulatory matters and anti-social behaviour. Of these around 20% relate to known HMOs in the city.

Table 2 – Breakdown of service requests received per year

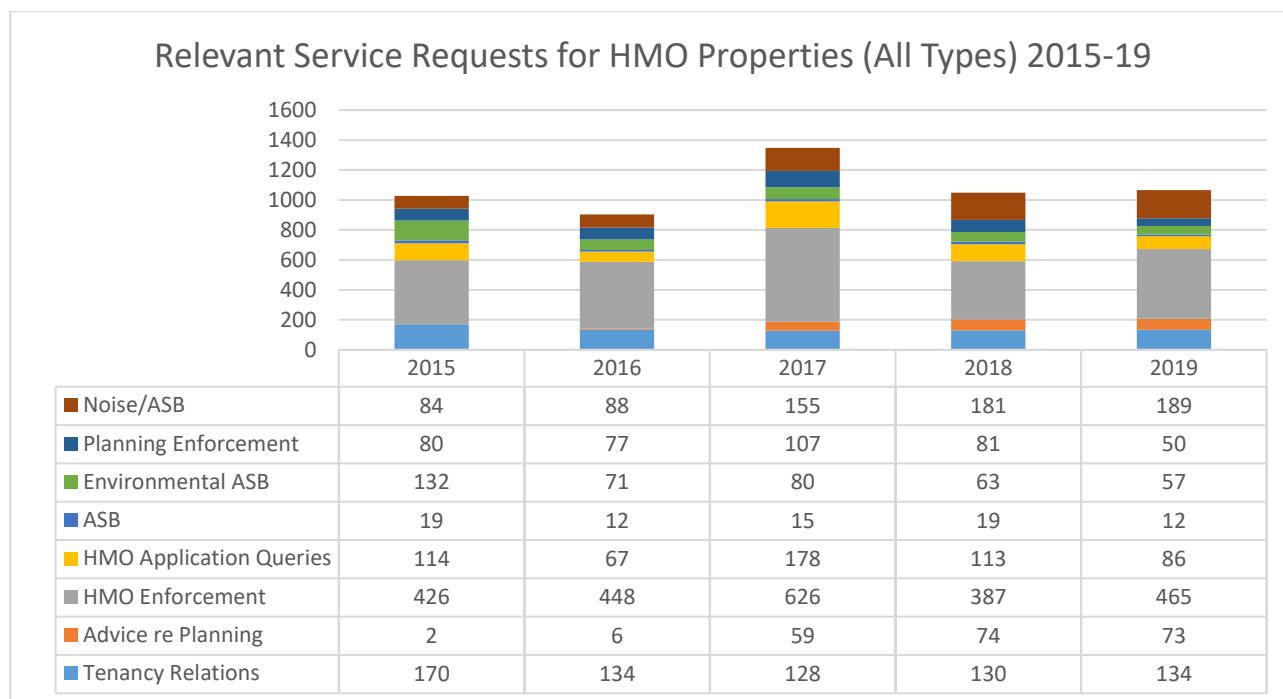
	2015	2016	2017	2018	2019
Service requests relating to HMOs	1027	903	1348	1048	1066
Service requests relating to Additional Licence HMOs	325	404	487	348	357
Percentage of HMO service requests relating to Additional HMOs	31%	45%	36%	33%	33%

It can be seen that of the service request received concerning HMOs, on average 36% of each years workload is in relation to those which fall within the additional HMO Licensing scheme. When service request were broken down by licence type it there ws no significant difference between the mandatory HMO stock and the smaller HMOs which fall into the Additional HMO licensable stock.

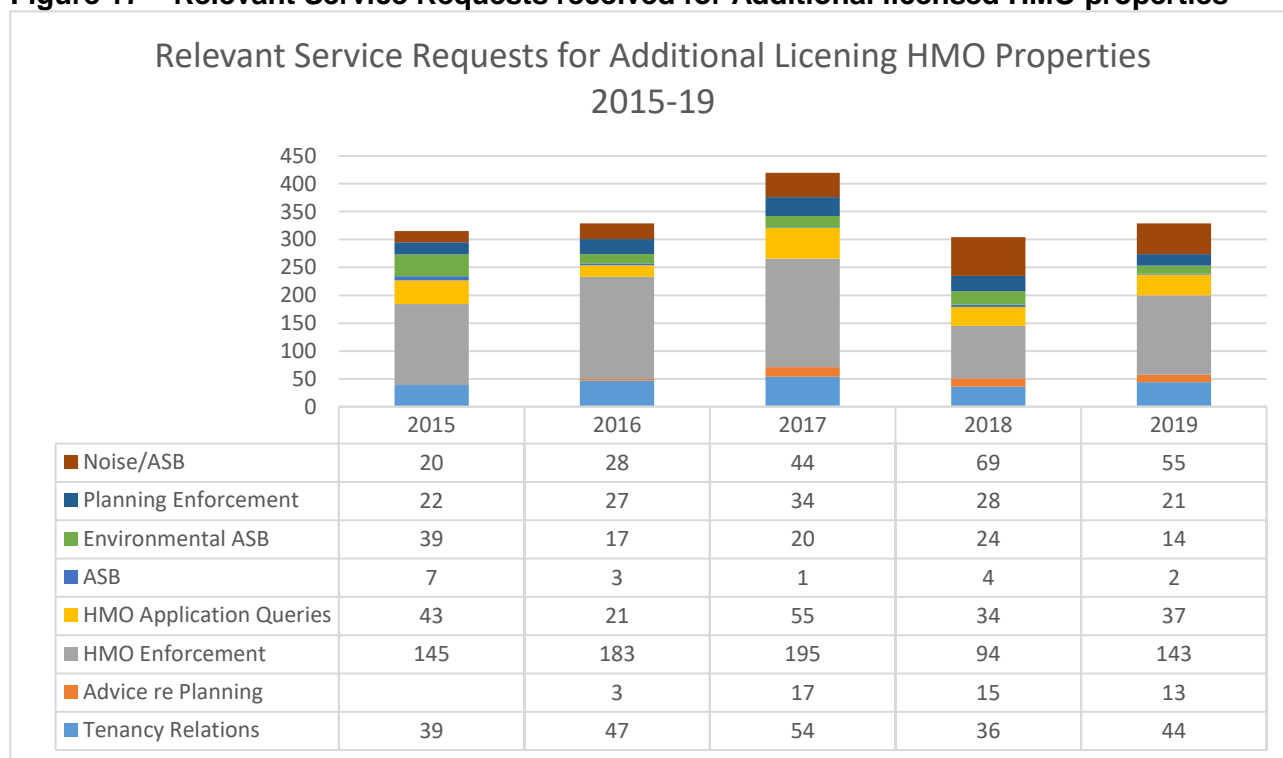
Captured in Figure 16 below is the number of relevant services requests received in relation to all licensed HMOs. There is a broad range of requests received covering such complaints which affect the community as noise and anti social behaviour (ASB) and environmental ASB. Work required to maintain the cohesiveness of communities is reflected in the number of service requests regarding

planning issues for HMO properties. Service requests for HMO enforcement, both proactive and reactive are shown as well as the work done in providing advice and assistance in ensuring the lawful protection of tenants rights.

Figure 16 – Relevant Service Requests received for HMO properties



Service requests received for known HMO properties licensed under the additional scheme closely follow the overall distribution of service request types for all HMO properties. See Figure 17

Figure 17 – Relevant Service Requests received for Additional licensed HMO properties


Other areas of the council contribute to the regulation of HMOs in the city but planning enforcement in particular plays a role in regulating HMO properties with 60% of all planning enforcement notices served in reference to HMOs

HMO Fees and Charges

A revised fee structure was introduced when the current scheme began in 2016 following comments received during the 2015 consultation on the renewal of the current scheme. Appendix 2 explains what is included in the fees. Landlords and agents were very clear that compliant landlords should not have to subsidise non – compliant landlords. Oxford City Council implemented a HMO licensing fee scheme to reflect these comments and to incentivise landlords to change their behaviour and improve management of their properties. Oxford has therefore introduced and operated a unique charging scheme for HMO licensing which reflects the costs of operating the scheme and compliant landlords are not subsidising non-compliant landlords. See Table 3 and Appendix 2 for details of the current fee categories. As part of the review the fee structure has been reviewed to ensure it is meeting its objectives and also how it compares to other similar schemes in operation.

Table 3 – Description of HMO licensing Scheme fees

Fee Category	Description
Category A	New HMO operating for more than 12 weeks without a licence
Category B	New HMO with application made within 12 weeks.
Category C	One year renewal
Category D	One year renewal classed as poor management
Category E	Two year renewal for compliant landlords
Category F	Five year renewal for Oxford City Council accredited landlords only

Fee comparison (Compliant /non- compliant landlord) – New HMO properties

If a landlord made their first application for an HMO licence in 2016 then - over the five year period of the current scheme:

- The highest fee paid would have been £2,706 for a landlord who failed to licence within 12 weeks and then was classed as poor management (Category A and D) on renewal each time.
- The lowest fee paid would have been £707 for a landlord who made their application within 12 weeks and then on renewal was given a five year (or to end of scheme) licence (Category B and Category F).

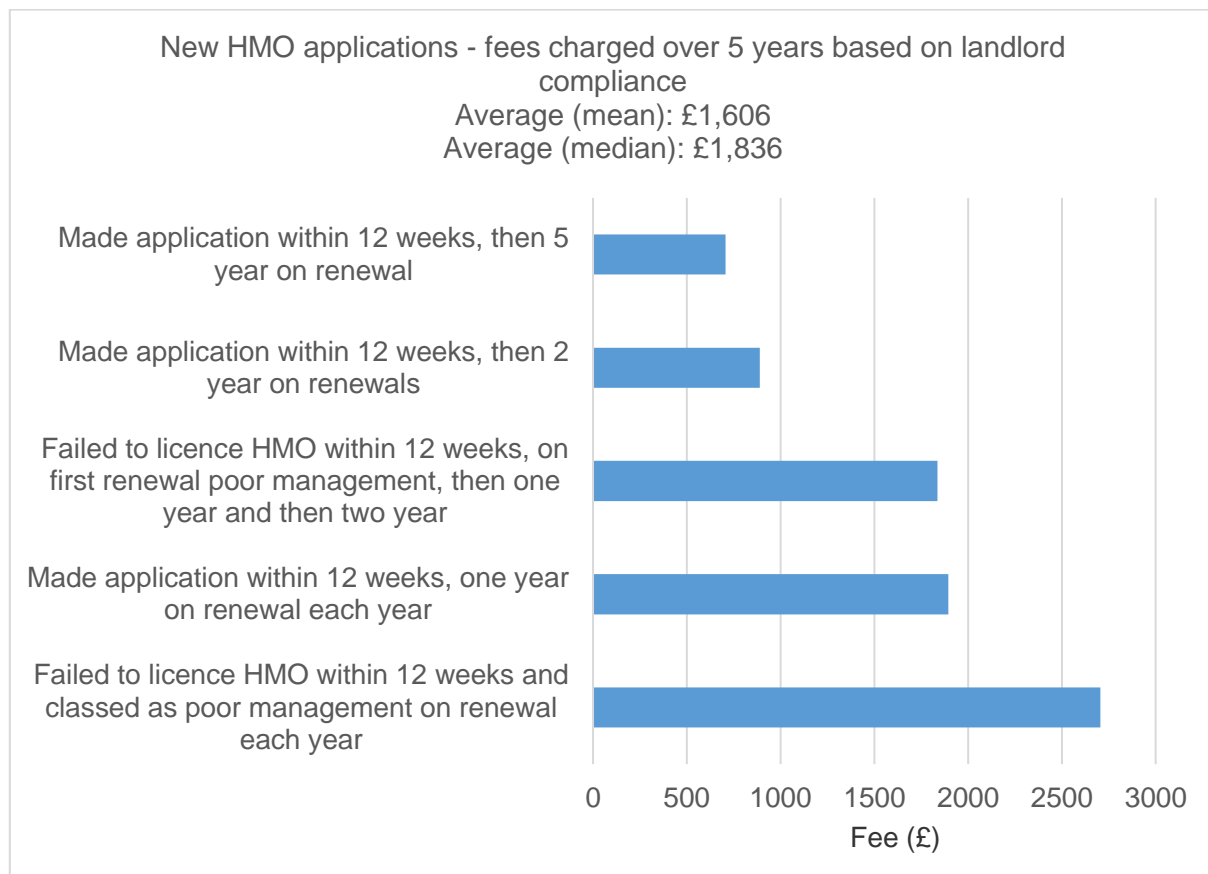
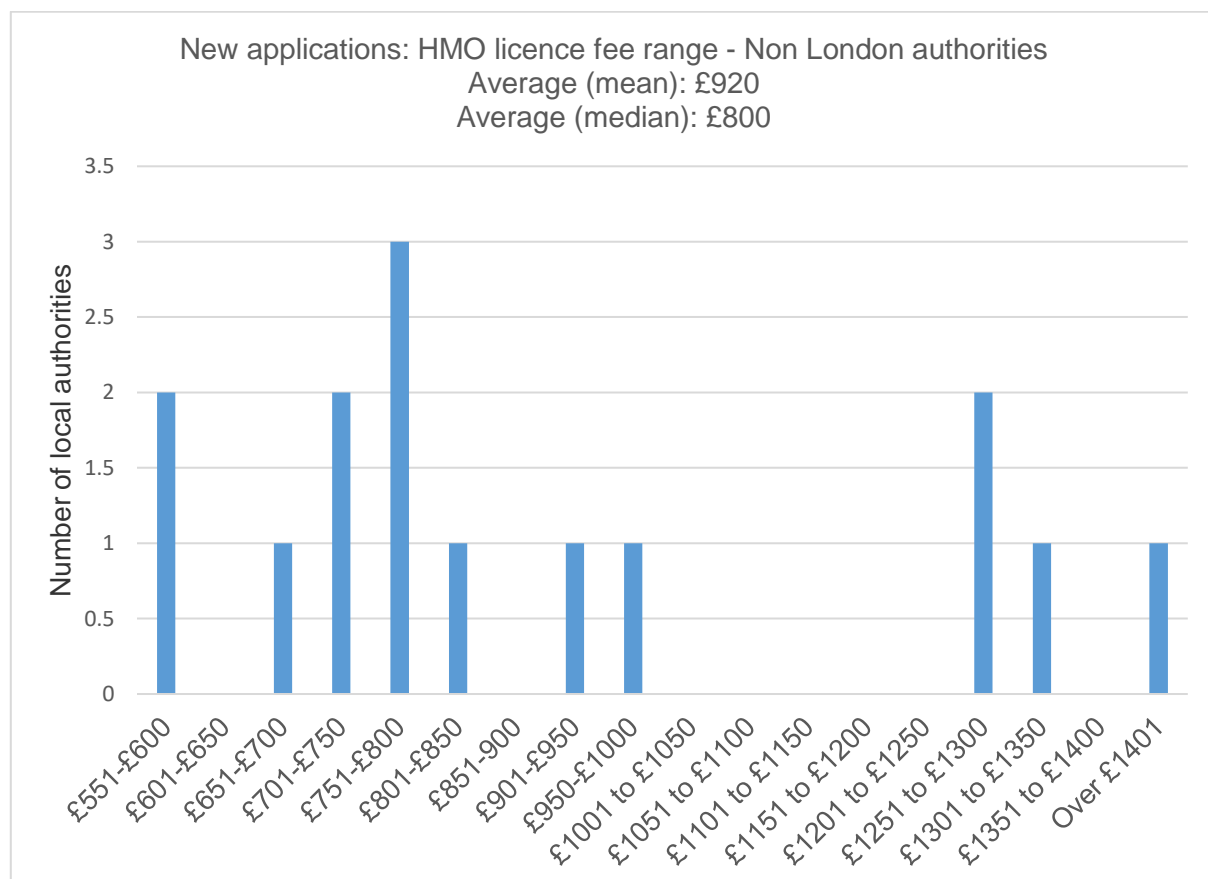
Figure 18 –HMO fees (new application)

Table 4– Breakdown of fees based on compliance with scheme

Description	Total fee over 5 years
Made application within 12 weeks, then five year on renewal	£707
Made application within 12 weeks, then two year on renewals	£890
Failed to make application within 12 weeks, on first renewal poor management, then one year and then two year on renewals	£1,836
Made application within 12 weeks, then one year on renewals	£1,895
Failed to make application within 12 weeks, then poor management on renewals	£2,706

Fee Comparison with other authorities – New HMO applications

Looking at other authorities (excluding London authorities) operating additional licensing schemes, the national average (mean) fee is £920 with median point £800. A compliant landlord in Oxford would have paid £707, less than the national average.

Figure 19– Range of New application fees for HMO across Non-London Authorities

It is clear that there are a few authorities that charge much higher fees. It is interesting to note that these areas are similar cities to Oxford, being university cities and regional employers.

- Bristol £1,420

- Nottingham £1,330
- Worcester £1,283
- Northampton £1,269

Fee comparison (Compliant /non- compliant landlord) – Existing HMO properties

As the current scheme was renewed there were a large proportion of HMOs in existence and therefore renewal fees have been analysed as part of the review

For an existing HMO, on renewal in 2016,

- The highest fee paid would have been £2,064 for a landlord who was classed as having poor management each year (Category D).
- The lowest fee paid would have been £307 for a landlord who was accredited by the council (Category F).

Figure 20 – Renewal Application Fees

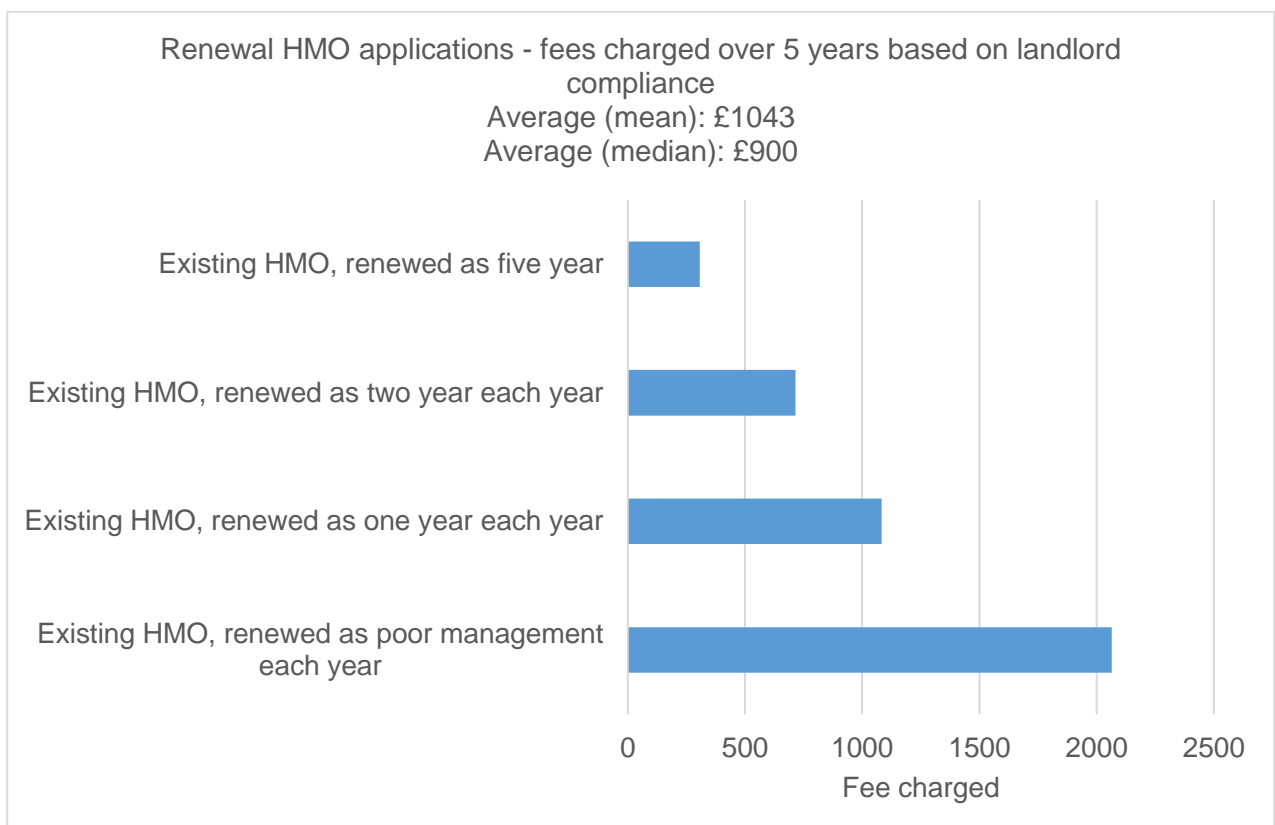


Table 5 – Breakdown of Renewal Fees

Description	Total fee over 5 years
Existing HMO, renewed as five year	£307
Existing HMO, renewed as two year annually	£716 for six years £574 for five years
Existing HMO, renewed as one year annually	£1,083
Existing HMO, renewed as poor management annually	£2,064

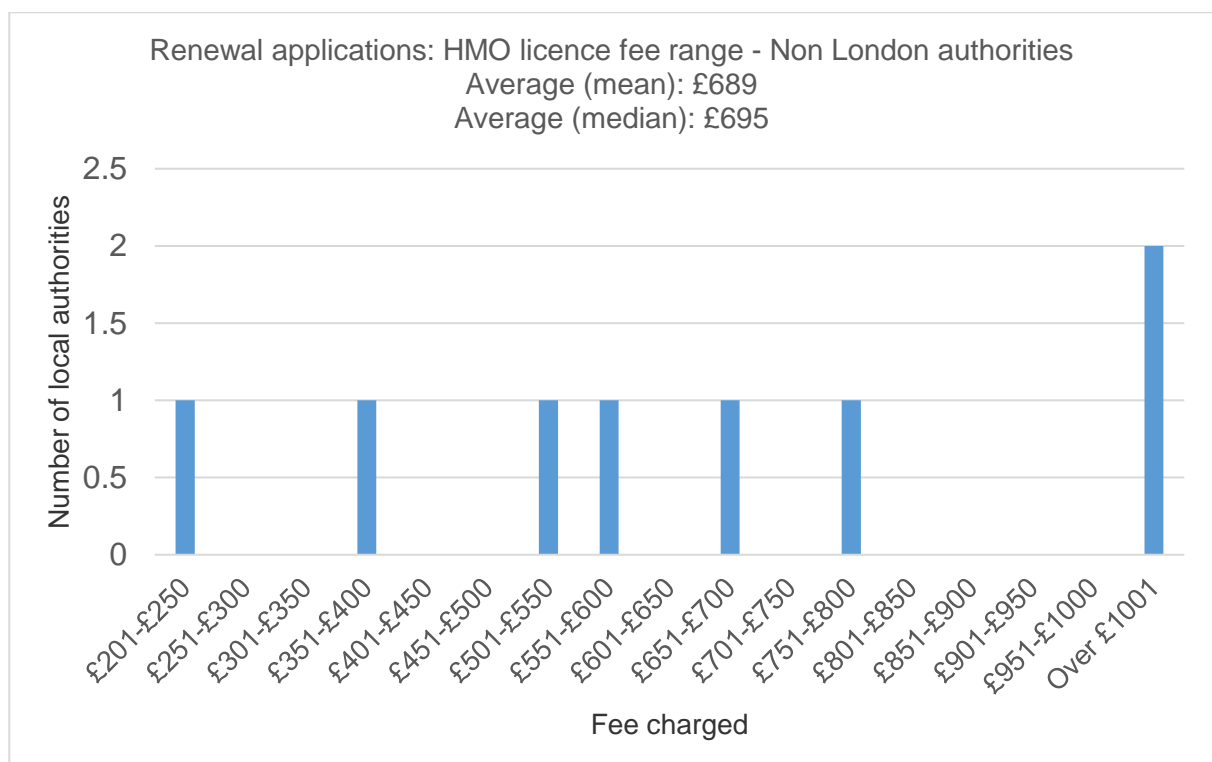
Fee Comparison with other authorities – HMO renewal applications

Looking at other authorities (excluding London authorities) operating additional licensing schemes, the national average (mean) renewal fee is £689 with median point £695.

An Oxford City Council accredited landlord would have paid £307, less than half of the national average. An Oxford City Council compliant landlord issued with two year licences (giving six licence years) would pay £716. To pro-rata to five years, the fee would be £574. The pro-rata five year fee is less than the national average.

(Note – when looking nationally, only those authorities that charged a different renewal fee were included). Two authorities charged over £1,001 – these were

- Bristol - £1,100
- Worcester - £1,181

Figure 21 – Range of Renewal application fees for HMO across Non-London Authorities

It is clear that in Oxford, over the five year period, compliant landlords pay far less than non-compliant landlords.

This demonstrates that Oxford City Council's fee scheme is set to ensure that compliant landlords do not pay more than non – compliant landlords. Oxford City Council is unique in having this type of fee structure to clearly reward compliant landlords and incentivise landlords to improve their properties and standards of management.

There is only one other comparable scheme – this exists in Hastings who operate a one, three or five year licence scheme. Hastings have a flat fee of £400 for every application. If a landlord was issued with one year licences for five years, the fee paid is £2000 however if a landlord was issued a five year licence they pay £400. Oxford's fees are similar to this.

Enforcement of the HMO Licensing Scheme

HMO licensing has applied to all HMOs across the city since 2012 and since that time it has provided a level playing field for all landlords and licence holders, this has meant that they are more accountable for the management and improvements of the HMOs in the city. The council, when it first introduced HMO licensing did not want it to be a paper exercise and were clear to be effective the scheme have to be enforced appropriately.

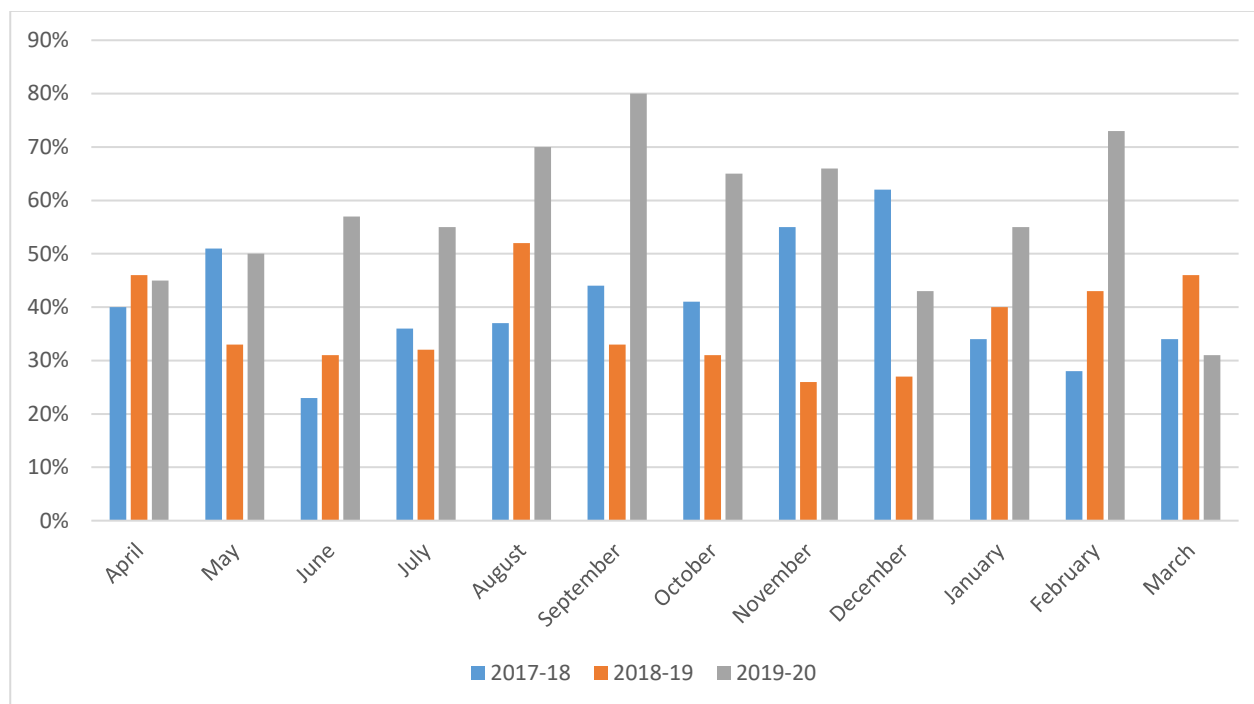
Since 2016 there have been in excess of 9,800 visits to HMOs, both reactive and proactive, to address concerns regarding HMOs and to check compliance with the licensing scheme.

Table 6 – HMO Inspections 2015-19

Visit Type	2015	2016	2017	2018	2019	Scheme Total
Compliance Visits	192	349	471	444	591	2047
Full Survey Visit	2		4	11	118	135
Representation Visits					18	18
Verification Visit	417	481	398	236	200	1732
Suspect HMO Visits	568	301	260	144	194	1467
Service Request Visits	477	431	554	224	174	1860
Grand Total	1656	1562	1687	1059	1295	7259

During the current scheme 233,998 conditions have been applied to HMO licences. These conditions inform the licence holder of the works and standards required to ensure compliance with the scheme. As discussed earlier there has been an improvement in the compliance rate with the scheme over the last few years see figure 22, however the council is still finding that over 51% of HMOs are not compliant when revisited.

Figure 22 - Compliance rates with HMO licensing



The council will always investigate cases of non-compliance it finds, including failure to licence HMOs. Investigations can result in a further licensing controls being applied through to prosecution or a financial penalty. Financial Penalties were introduced by the Housing and Planning Act 2016 in April 2017, these are now used by the council in the majority of cases. In each case Law and Governance must determine if there is sufficient and suitable evidence available, that the case is in the public interest to take action and there is a realistic prospect of a conviction if the case was to be presented to the magistrates court; meaning that such penalties are given the same level of scrutiny as previous prosecution cases.

The Council has continued to focus its resources on tracking down those landlords who are operating unlicensed HMOs. This has resulted in 2,460 investigations being carried out into such properties and 53 financial penalties or prosecutions for operating without a licence.

For HMOs that are already licensed, the council has found the possibility of a prosecution or financial penalty and loss of “fit and proper person” status and losing a licence is of great concern to most landlords. This has meant that in the majority of cases, the landlord will take steps to remedy the problems referred to them without the need for legal intervention. However, the Council has also taken formal action in a small number of cases of non-compliance with the HMO licensing scheme.

Compliance Rates for Providing Required Certificates

Engaging with appropriate contractors to conduct routine checks on the condition of the property, including obtaining legally required safety certificates, represents the bare minimum of professional property management. A key part of the application process is providing valid certification that demonstrates compliance with a number of basic property standards. Many of the certificates requested are already a legal requirement under existing legislation, such as gas, electrical and EPC certificates.

Fire safety in particular is a critical area of concern in HMOs and as such landlords are asked to provide at the point of application certificates to cover checks on the fire alarm system and emergency lighting system. Also required is a copy of the annual landlord gas safety check report a copy an electrical system conditions report undertaken within the last five years along with a separate portable appliance test (PAT) report covering the condition of electrical provided with the property. To verify the thermal performance of a property a valid Energy Performance Certificate (EPC) is a further requirement.

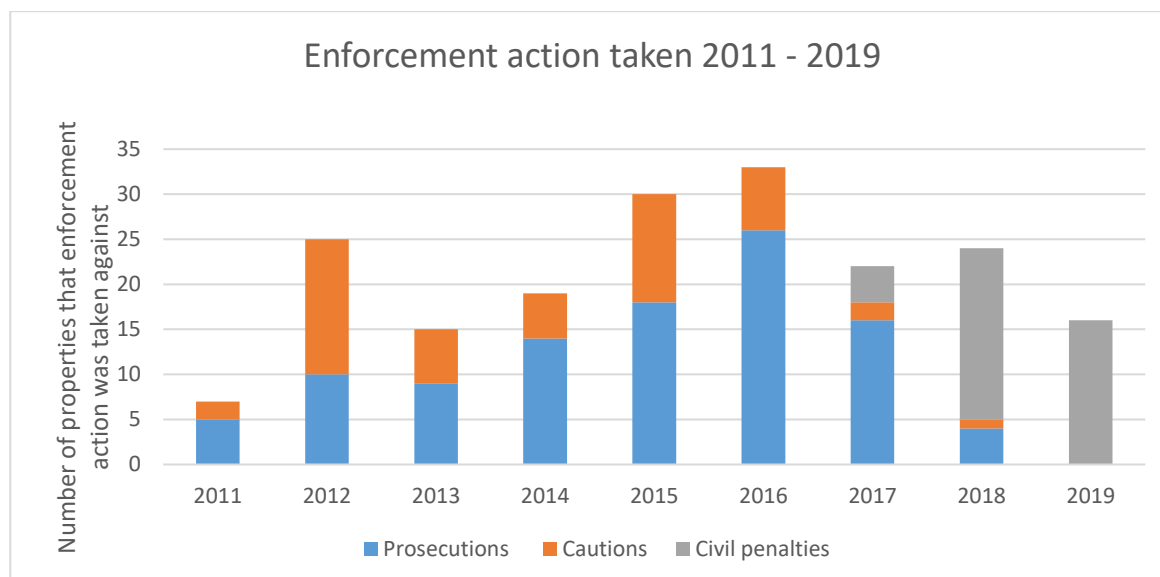
These certificates and reports give an indication of the condition of the property and how that property is being managed. If a landlord does not provide the certificate(s) requested, the council cannot refuse to grant a licence and the landlord must provide the certificate within a month of issue date. Longer licences are therefore only granted when the required certification has been provided.

Despite this compliance with the provision of valid certificates is still below an acceptable level with approximately 20% of all certificates provided being invalid (through either being out of date, unsatisfactory or not provided) which includes 9% of required certificates failing to be provided at all for applications submitted in 2019. Several certificate types have an even lower level of compliance when looking at each type individually with Emergency Lighting Certificates having the highest level of non-compliance at 29%. Where certificates are not able to be provided along with the licence application this provision may be conditioned onto the licence itself with landlords given a short timescale to provide. Landlords are also required to provide copies of new certificates and reports during the course of the license. The table below contains the compliance rates for the provision of valid reports and certificates as well as where certificates have expired and not updated.

Table 7 – 2019 Application compliance rates for the provision of certificates and reports

Certificate Type	Certificates Checked	Invalid or No Certificates	Non-Compliance %	No Certificate Provided Only	No Certificate %
Electrical Safety	2258	396	18%	166	7%
Emergency Lighting Test	942	270	29%	158	17%
Energy Performance	2254	198	9%	85	4%
Fire Alarm Test	2256	591	26%	269	12%
Landlords Gas Safety	2198	512	23%	189	9%
Portable Appliance Test	177	42	24%	1	1%
Totals	10085	2009	20%	868	9%

Figure 23 – Enforcement action taken



It is interesting to note that the majority of legal actions have been taken in relation to HMOs which fall within the Additional HMO licensing scheme. This demonstrates that a significant proportion of these HMOs are being managed by landlords who do not wish to comply with legal requirements.

Table 8 – Enforcement action by licence type

Licence Type	2016	2017	2018	2019
Mandatory	17	7	10	5
Additional	13	10	11	21

Table 9 – Enforcement action by Offence

Offence	2016	2017	2018	2019
Sec 72(1) – operating without a licence	16	16	7	14
Sec 72(3) – breach of licence conditions	3	1	5	2
Sec 234 – breach of management regulations	17	12	9	10

It is worth noting that the HMO Management Regulations apply to all HMOs irrespective of whether the property has a licence and 22 of the above cases where breaches have been investigated

apply to HMOs which require an Additional licence, such breaches would still require investigation even if the additional licensing scheme was not in operation.

Following a successful prosecution or the service of a financial penalty, the landlord could be considered not to be a “fit and proper person”, this could lead to their licence being revoked. The landlord would then need to find a suitable person to take over the licence and make a new application. If this is not possible the council will issue an interim management order and takes over control of the property if it remains as a HMO. This approach has been adopted on 3 occasions during the current scheme, however 16 cases have been dealt with where this has been a real possibility, these cases have resulted in the landlord employing a local agent to fully manage the property and the agent has become the licence holder.

The Next steps

It is clear from undertaking the review of the current scheme that additional HMO licensing in Oxford is a key method in bringing about improvements in a proactive manner to part of the HMO stock. The current Additional HMO Licensing scheme will expire on 25th January 2021, if the scheme is not renewed there will only be, based on current data, 55% of the HMOs in the city requiring a HMO licence under mandatory licensing.

In order for the Council to ‘renew’ the scheme it must proceed in accordance with the statutory process as laid out in the Housing Act 2004 and to comply with the Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2015.

Section 56 of the Act places requirements upon the Local Housing Authority when considering a designation for additional licensing of HMOs, in that the Council must:

- Consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public; and
- Take reasonable steps to consult with persons who are likely to be affected and consider any representations made in accordance with the consultation and not withdrawn; and
- Have regard to any information regarding the extent to which any codes of practice approved under section 233 have been complied with by persons managing HMOs in the area (these codes relate to University managed accommodation).

Section 57 provides further considerations for the Local Authority in that they should ensure that:

- Exercising the designation is consistent with the authority’s overall housing strategy; and
- Seek to adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behavior affecting the private rented sector as regards combining licensing with other action taken by them or others; and
- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question; and
- That making the designation will significantly assist them to deal with the problem or problems (whether or not they take any other course of action as well).

The General Approval provides the condition that any consultation period for the proposed designation should not be less than 10 weeks.

Option Appraisal

Following a detailed assessment of the data provided earlier in this review report, options for the future of additional licensing have been considered. These options seek to meet the stated aims and objectives and to deliver positive and lasting change. Whilst it is noted that there has been improvement in the HMO stock in the city it should also be noted that poor conditions and management practices are still evident in non-compliant HMOs which account for around 40% of the licensable stock.

A number of options were considered which could be applied across the city, ranging from statutory action only to complete renewal of the Scheme. It is recognised that to be effective the review should consider all possible options.

The preferred final option must:

- Be technically feasible
- Be in accordance with relevant statutory powers
- Contribute toward strategic objectives
- Be appropriate to the needs of the community
- Be financially deliverable and sustainable

The following options were considered:

Option A – Statutory Action Only. This would mean that only those HMOs which are occupied by 5 or more persons would require a HMO licence, currently these account for 55% of the licensed HMO stock – however such HMOs may reduce in number as landlords could reduce the number of lettings to avoid licensing. This option would also rely on HMO occupiers or neighbours complaining to the Council for issues to be addressed, tenants often choose to put up with poor conditions rather than risk complaining for fear of retaliatory evictions. It is unlikely this would address environmental and management issues and this would most likely lead to a continuing spiral of decline in both housing standards and the wider community, with a growing need for intervention in future years. This option could also increase the service demand to other areas eg in relation to waste and anti – social behaviour. This option would not meet the criteria for the preferred option as although it is technically feasible, it is not financially deliverable as the income receivable from any mandatory licensing scheme would not cover the cost of undertaking regulatory work in non-licensable HMO stock, this option does not contribute to the strategic aims and would make very little contribution to the aims and objectives of the scheme.

Option B – Renewal of the Scheme in certain areas of the City. This option was considered, however if the scheme was to be renewed only in certain areas of the City there would be a huge amount of inconsistency in the regulation of HMOs, in some parts of the City there are higher concentrations of HMOs but non-compliance continues to be found in all areas. Intervention to deal with excluded areas would be reduced and this could result in an increase of HMOs in the excluded parts of the City; which could lead to a loss in family homes in those parts. The Council would also have very limited powers to deal with any issues in HMOs which were not within the

licensing scheme and so this would impact on the local community and would do very little to create a sustainable and viable housing market. This approach does not address the need for a comprehensive scheme and does not provide a level playing field for all HMOs or meets all of the aims and objectives of the scheme. This option does not align fully with the council objective.

Option C – Renewal of the Scheme in its entirety. This option assumes that the existing scheme will be ‘renewed’ in its entirety, thereby licensing all HMOs in the City. This option would allow for continued engagement with landlords and agents operating in the city as well as with tenants. The Council would be able to continue to monitor the progress of the scheme and to ensure that there is an improvement in the compliance with the scheme. This option is technically feasible, financially deliverable and contributes to the corporate aims, it may not fully meet the criteria to be ‘appropriate to the needs of the community’ as some landlords, who are part of the community may not agree that a scheme of licensing was appropriate to their needs.

Option C is considered to be the best option for dealing with the whole range of aims and objectives of the scheme. The option meets all the rules in most respects and is the preferred course of action for the future of the Scheme.

Recommendations

The key findings of this review and the recommendation to renew the scheme will be presented to the cabinet meeting in September 2020.

The recommendations will include a proposal to commence a new designation for a period of 5 years.

If approved the Council will proceed with the statutory consultation for a new designation for a minimum period of 10 weeks and submit a future report to Cabinet setting out the results of the consultation and the structure of the new designation.

Appendix 1 – Benchmarking exercise re HMO conditions

A benchmarking / comparison exercise was undertaken to establish common conditions among other local authorities operating additional licensing schemes. Although there are around 32 local authorities that operate additional licensing scheme across England (including London), it was only possible to find information on there “standard” conditions for 16 authorities*. This exercise was in two parts:

- Part 1 – comparison with existing “discretionary standard” conditions on Oxford HMO licences
- Part 2 – identification of conditions not included as “standard” on Oxford HMO licences.

Part 1– comparison with existing “discretionary standard” conditions on Oxford HMO licences

Condition on Oxford HMO Licence	% authorities including this condition
Explicitly state number of occupants / households	31%
Inventory	0%
Provide electrical report	75%
Provide EPC	25%
Provide certificate / declaration annually that fire alarm system has been tested to British Standards	69%
Display copy of licence	75%
Display managers details	63%
Display fire procedure notice	31%
Keep means of escape clear	13%
Notify authority of changes including licence holder address, house changes and persons involved in management	88%

The above table demonstrates, that for the most part, Oxford City Council has conditions on HMO licences in common with other authorities.

- It appears that asking for an inventory specifically is not common, however on closer inspection many authorities include conditions around “providing information to tenants” and this includes an inventory (see below).
- Asking for an EPC is only in common with 25% of other authorities however Oxford City Council has a strong focus and emphasis on sustainability and carbon reduction and this aligns with the Council’s own corporate aims.
- Specifically stating the number of occupants / household as a condition is also less common. Oxford City Council does this to be clear the number and households is obvious to landlords and tenants.

- Conditions on displaying a fire procedure notice and keeping means of escape reasonably clear is again less common. However, this is judged to be good practice and will assist occupants in an emergency.

Part 2 – identification of conditions not included as “standard” on Oxford HMO licences.

Condition not on Oxford HMO licence	% authorities including this condition
Condition to take steps to address anti-social behaviour	94%
Condition to maintain the property	63%
Condition to undertake regular inspection (six monthly)	56%
Condition that once informed of pests at the property, being required to take steps to remove pests	63%
Condition to provide security provision (this was most commonly window locks and provision of keys to gates)	19%
Condition to obtain references from prospective tenants	38%
Condition to provide tenants with specific information, including repair timescales, and abide by tenancy law	44%
Condition to provide a rent receipt if rent paid in cash and if by BACS payment, this is the receipt	31%
Condition to have emergency arrangements in place and contact available if the licence holder is absent – that tenants should have contact details of who to contact	63%
Condition to attend training / obtain accreditation	38%

The above table shows there are some conditions that other local authorities place on licences that Oxford does not. It is proposed to include further conditions to ensure Oxford licences are similar to other authorities and improve management practices, as follows:

- Condition relating to the licence holder to take steps to address anti-social behaviour. 94% of other authorities include this as a condition. This strongly suggests that Oxford City Council should consider a condition relating to anti-social behaviour. The provision to designate an area subject to additional licensing is where a “significant proportion of HMOs are poorly managed to give rise to occupants or the community”. This condition reflects the need to manage HMOs so that they do not give rise to problems for the community. There is already the

mandatory condition relating to waste including to ensure the tenants understand the waste disposal requirements of the council. Including a condition to ask landlords to include specific items in the tenancy agreement, such as being neighbourly and outlining good behaviour to tenants will help reduce issues with noise nuisance.

- Condition to maintain the property, undertake regular inspections and to treat pests. “Maintaining property” and “pest treatment” was required by 63% of local authorities, while regular inspection was slightly lower at 56%. Again, this relates to the reason for designating an area subject to additional licensing and ensuring the HMO does not give rise to problems for occupants and the community. Including this as a condition will further improve management of HMOs. While many landlords and agents are proactive and inspect properties, maintain the property and respond to issues about pests, around 40% have been shown to be non – compliant. One of the weaknesses identified by officers is that landlords “expect” the council to tell them what is wrong rather than landlords undertaking a proactive approach. This condition will further improve management and professionalism of landlords – this reflects the government approach.
- Condition to have emergency arrangements in place and a process for when the licence holder is away. This is something that over 63% of local authorities include. The reasons for including this as a condition are similar the above point and will ensure that tenants know who to contact in an emergency. When granting an HMO licence, there must also be “satisfactory management arrangements in place” and this covers emergency arrangements and covering periods of licence holder absence. Of course, it is recognised that landlords will take holidays and most will have arrangements already in place. However, sometimes landlords are overseas for significant periods of time, for example longer than a month. In these situations, the licence holder must have adequate arrangements in place and the condition will make this clear. It is not expected that landlords will need to employ an agent – given the internet and mobile communication, it should be possible to manage the house from overseas however it is expected that in these cases that landlords have a list of contractors readily available. This condition will make this clear.
- Condition relating to obtaining references. While only 38% of authorities include this as a condition, it is noted that this condition is a mandatory condition for selective licensing. If the council implements selective licensing, similar conditions will be needed for both. It is proposed to include this as a condition. It will also help prevent issues with anti-social behaviour from tenants by ensuring tenants are proven to be responsible.
- Condition relating to providing tenants with information when they move in. 44% of authorities include this as a condition. It was noted that an inventory was normally part of this information. Other information to be provided included: copies of gas certificate, EPC, deposit information, “how to rent” guide, emergency arrangements and information around waste disposal. It is proposed to include a condition to improve management of HMOs.

- Condition relating to rent receipts. While only 31% of authorities include this as a condition, it is important that landlords keep a record of rent. Electronic payment is common now and this provides an audit trail. However, where rent is paid in cash then records need to be kept. It is therefore proposed to include a condition that rent payments in cash or cheque must be recorded and that electronic bacs payment provides a record.

It is not considered necessary to include conditions on:

- Training and accreditation. While 38% of local authorities include this as a condition, Oxford City Council's scheme is very different to most authorities. A five year licence is on offer to landlords accredited with us and so this should already incentivise landlords to obtain training / accreditation.
- Security provision. Only 19% of authorities include this as a condition. It is not considered necessary as this should be covered by a housing health and safety rating assessment or a specific condition.

*Local Authorities used in Benchmarking exercise

Council	Area	Additional licensing	Scheme researched
Bath and North East Somerset Council	South West	Yes	Yes
Blackpool Council	North West	Yes	Yes
Brighton and Hove City Council	South East	Yes	Yes
Bristol City Council	South West	Yes	Yes
East Riding of Yorkshire	Yorkshire and Humber	Yes	Yes
Doncaster Council	Yorkshire and Humber	Yes	Yes
Harlow Council	South East	Yes	Yes
Hastings Borough Council	South East	Yes	Yes
Liverpool City Council	North West	Yes	Yes
Newcastle City Council	North East	Yes	Yes
Northampton Council	East Midlands	Yes	Yes
Nottingham City Council	East Midlands	Yes	Yes
Sefton Council	North West	Yes	Yes
Slough	South East	Yes	Yes
Worcester City Council	East Midlands	Yes	Yes

Appendix 2 – HMO licence fee categories

The table below demonstrates what is included in each licence fee category.

<p>CATEGORY A – Higher charge NEW HMO application where the HMO has been operating for more than 12 weeks. The higher fee is to reflect the additional time spent generally on unlicensed HMOS. This includes the time:</p> <ul style="list-style-type: none"> • to process the application; • an inspection before the licence is granted to establish occupancy number and any additional work needed and the time to write licence conditions; • a compliance visit during the licence; • an enforcement charge – this charge is added to reflect the time spent over a five year period on unlicensed HMOs • general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs
<p>CATEGORY B - Standard NEW HMO application made within 12 weeks This category is when a NEW licence application is made promptly - it is our standard cost for a new application. This category also applies where a licence has expired and a new application is received within six weeks of the expiry date. This includes the time:</p> <ul style="list-style-type: none"> • to process the application; • an inspection before the licence is granted to establish occupancy number and any additional work needed and the time to write licence conditions; • a compliance visit during the licence; • general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs
<p>CATEGORY C – Standard RENEWAL HMO application. This category is for a RENEWAL licence - it is our standard cost for a renewal application. This applies where the landlord does not meet the criteria to receive a two or five year licence. This includes the time:</p> <ul style="list-style-type: none"> • to process the application; • a percentage cost for a five year inspection - all HMOs must be inspected once every five years • general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs
<p>CATEGORY D - non compliant RENEWAL HMO application. This category is when a RENEWAL licence application is classed as "non-compliant". This may be for a variety of reasons e.g.</p> <ul style="list-style-type: none"> • on the day of the compliance inspection, work was not completed within the timescale set; • there has been a service request that has led to work being added during the last licence; • action required by the council to resolve problems; • repeated failure to send in certificates on expiry; • other reasons to be considered non-compliant <p>This includes the time:</p>

- to process the application including time spent writing additional conditions on the licence due to the non - compliance;
- a compliance visit during the licence;
- general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs

CATEGORY E -

This category is for a RENEWAL licence - it is for landlords who are compliant and meet our two year licence criteria.

This includes the time:

- to process the application;
- two year licence ongoing administration charge - this includes receipt of certificates and other documents during the licence;
- general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs.

CATEGORY F -

This category is for a RENEWAL licence - it is for landlords who are compliant and meet our five year licence criteria.

This includes the time:

- to process the application;
- five year licence ongoing administration charge - this includes receipt of certificates and other documents during the licence and an inspection during the five years;
- general scheme costs - this charge is added to all licences to reflect ongoing costs associated with licensing, such as variations, revocations, temporary exemptions, landlord educational events, officer training, responding to service requests relating to HMOs.

References

1	English Housing Survey 2017 to 2018: private rented sector	https://www.gov.uk/government/statistics/english-housing-survey-2017-to-2018-headline-report
2	English Housing Survey 2018 to 2019: private rented sector	https://www.gov.uk/government/statistics/english-housing-survey-2018-to-2019-headline-report
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4	UK private rented sector: 2018	https://www.ons.gov.uk/economy/inflationandpriceindices/articles/ukprivaterentedsector/2018
4	ONS Research outputs: Subnational dwelling stock by tenure estimates, England, 2018	https://www.ons.gov.uk/releases/researchoutputsubnationaldwellingstockbytenureestimate2018
5	Oxfordshire County Council District Population forecasts	https://public.tableau.com/views/29thAugustPopulationForecasts/Districtpopulationforecasts?%3Aembed=y&%3Adisplay_count=yes&%3AshowTabs=y&%3AshowVizHome=no#1
6	Higher Education Student Statistics: UK, 2017/18 - Student numbers and characteristics published Jan 2019	https://www.hesa.ac.uk/news/17-01-2019/sb252-higher-education-student-statistics/numbers
7	English indices of deprivation 2019	https://www.gov.uk/government/collections/english-indices-of-deprivation
8	ONS Subnational dwelling stock by tenure estimates 2018	https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/subnationaldwellingstockbytenureestimates
9	ONS Local Authority Housing Statistics dataset, England 2018-19: Section F - Condition of Dwelling Stock	https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2018-to-2019
10	Valuation Office Agency VAO: Summary of monthly rents recorded between 1 October 2018 to 30 September 2019	https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/privaterentalmarketsummarystatisticsinengland/october2018toseptember2019