

The Private Rented Sector in Haringey: An analysis of the sector and proposals to improve it

Executive Summary

Drawing upon evidence collected over the course of Citizens Advice Haringey's casework, this report examines the problems associated with the private rented sector (PRS) in the borough, and offers recommendations as to how it can be improved.

Key Points:

- The PRS in Haringey faces a number of serious issues including poor housing conditions, poor landlord and agent practices, limited security of tenure, and an under-resourced regulatory system that can appear unappealing or confusing to those seeking redress.
- Citizens Advice Haringey supports the council's proposed selective licensing scheme. However, as an examination of enforcement numbers in London shows, establishing a selective licensing scheme cannot in itself solve all PRS-related problems. The manner in which the selective licensing scheme is implemented will be vital to its success.
- We therefore recommend that when implementing the scheme, the council should:
 - dedicate significant resources to the scheme.
 - clearly spell out its accompanying enforcement strategy and ensure it is consistently implemented.
 - establish and publicise clear and measurable targets regarding the aims of its selective licensing scheme and broader approach to the PRS.
 - compile and regularly publish data regarding the effects of the selective licensing scheme.
 - Ensure migrant welfare is prioritised under the scheme.

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1. The Private Rented Sector in England

A range of problems beset the PRS in England, and many of these have been exacerbated by the coronavirus pandemic. The most prominent problems include:

- **Poor housing conditions.** The English Housing Survey 2019-20 found that 23% of privately rented homes are 'not decent', and a Yougov survey commissioned by Shelter found that in the year preceding September 2019, 69% of private renters in England experienced disrepair or poor housing conditions. Among the most common issues were mould, damp, boiler disrepair, plumbing issues and poor insulation. These problems can pose health risks, with 9% of renters saying that their health had been adversely affected by their living conditions, and 8% of privately renting parents saying that their children's health had been adversely affected. Landlords can be uncooperative when asked to carry out repairs. Citizens Advice research found that 19% of renters who encountered disrepairs had to wait an unreasonable amount of time before their landlord carried out repairs, while a quarter were forced to spend money carrying out the repair themselves.
- **Poor landlord and agent practices.** The Yougov survey cited above found that large numbers of renters reported being subjected to poor practices from their landlords and letting agents, including:
 - Landlords/agents entering renters' homes without prior notice.
 - Landlords/agents or their representatives speaking and writing to renters in a rude, threatening or unfriendly way.
 - Landlords/agents or their representatives threatening, harassing and assaulting renters, and subjecting renters to sexual harassment and unwanted attention.
 - Landlords/agents unfairly holding on to tenancy/damage deposits, and failing to place deposits with approved government protection schemes.
 - Landlords/agents stealing and damaging renters' property.
 - Landlords/agents cutting off renters' water, gas and electricity for no good reason.
 - Landlords/agents or their representatives subjecting renters to discrimination on the basis of renters' race, nationality, gender, sexual orientation, age and disability.
 - Illegal evictions.

- **Limited security of tenure**

- Section 21 of the Housing Act 1988 allows landlords to serve an assured shorthold tenant with an eviction notice for no reason. The threat of these ‘no fault’ evictions exacerbates the problems outlined above, as tenants who complain to their landlord run the risk of losing their home as a result.
- Section 8 of the Housing Act 1988 allows landlords to serve a tenant with an eviction notice for a variety of reasons, the most common of which is rent arrears. Nationwide, the coronavirus pandemic has reduced incomes for many people, causing them to fall behind on a variety of bills including rent.
- Legislation enacted in response to the coronavirus pandemic temporarily strengthened renters’ security of tenure, by extending the notice period for possession actions and banning bailiff-enforced evictions. However, the ban on bailiff-enforced evictions expired on 31 May 2021, and it is unclear how long extensions to notice periods will remain in place. The government’s promised Renter’s Reform Bill (which is likely to propose abolishing Section 21 evictions) will not be outlined until autumn 2021.

- **A patchy, under-resourced regulatory system that can appear unappealing or confusing to those seeking redress.** In England, the PRS lacks both a national landlord register and a national regulator.

- The absence of a national regulator for the PRS means that the regulation and enforcement of private housing standards is mostly delegated to local authorities. Councils have been forced to carry out significant budget cuts as a result of the reduction in central government funding since 2010. Between 2009/10 and 2019/20, local authority spending on the regulation and regeneration of private sector housing in England fell by 70% per person. At a time when private renting has increased dramatically in many parts of the country (including Haringey), local authorities have been forced to cut the number of staff dedicated to both tenancy relations and the inspection and enforcement of PRS standards. This shifts the burden of action to secure improved PRS standards to tenants, who are often uninformed regarding their rights, or who fear retaliatory eviction by their landlord.
- The absence of a national landlord register in England means that data about the quantity and quality of landlords is patchy, limiting prospective renters’

capacity to make informed decisions about their housing situation, and restricting councils' knowledge about the state of their borough's PRS.

2. The Private Rented Sector in Haringey

The PRS supplies much of Haringey's housing. In 2019 private rented housing comprised 40% of all residential dwellings in the borough, outstripping owner-occupied (32%) and social housing (28%). Data from the Office for National Statistics shows that Haringey's private renter population is among the largest in London (see Table 2 below). Most of the problems outlined in Section 1 are present in Haringey. Table 1 shows the prevalence of housing related issues dealt with by Citizens Advice in Haringey in 2018-19, 2019-20 and 2020/21. In order to highlight the effects of the coronavirus pandemic, the start date for each year is 23 March (the date when the first national lockdown began in 2020).

Table 1. Number of housing-related issues dealt with by Citizens Advice in Haringey, 2018-19 - 2020-21

Issue	23/03/18 - 23/03/19	23/03/19 - 23/03/20	23/03/20 - 23/03/21
Anti-social behaviour	7	6	21
Fitness for human habitation	0	7	14
Harassment by landlord	13	5	45
Illegal eviction	4	10	38
Other	77	71	210
Possession Action / eviction	109	78	118
Letting agent problems	17	5	25
Rents / charges / rent arrears	116	94	157
Repairs / maintenance	38	27	107
Security of tenure	8	4	14
Suitability of Accommodation	15	10	52
Deposits / rent in advance	39	33	44
Total	443	350	845

Source: Citizens Advice data

In the two years before the pandemic, four issues dominated Citizens Advice Haringey's work in Haringey: possession action, rent, disrepair and issues related to tenancy deposits. In 2020/21, there were sharp increases in almost all housing-related issue numbers, with especially significant jumps in issues related to disrepair (see Case Study 1), rent, landlord harassment, illegal eviction and suitability of accommodation.

This increase in issue numbers is partly due to the success of Citizens Advice Haringey's Lottery funded housing project, run alongside Pro-Bono Community. Established in October 2020, the project encouraged renters aged under 35 to approach Citizens Advice Haringey with their housing-related problems. The other factor contributing to increased issue numbers has been the coronavirus pandemic (see Case Study 2). Widespread layoffs and furloughing have shrunk many renters' incomes, leading to a buildup of rent arrears. Despite legislation banning bailiff-enforced evictions and extending the notice periods for possession actions, the threat of both legal and illegal evictions has continued to concern Haringey's renters, while landlord harassment has increased sharply. Meanwhile lockdown measures and the rise in home working have increased the time renters and their children have spent at home. As a result, renters have been less willing to tolerate issues such as anti-social behaviour and disrepair.

Case Study 1

A 31 year old woman approached Citizens Advice Haringey regarding landlord harassment and her wish to make a homelessness application. The client is a mother of an eight-month-old baby. She is living in a one bedroom property, is in receipt of Universal Credit, and has never been in rent arrears. The client has had problems with pests and wastewater coming into the property through cracks in the ceiling. The wastewater leaks have caused damp walls and damaged the client's belongings. The client has photo and video evidence of the damage, but the landlord has been unwilling to make repairs.

The landlord had agreed to give the client a notice letter to leave the property because the property was unsuitable for the client and her baby. The client needed the notice letter in order for the council to rehouse her.

However, the landlord then refused to provide the notice letter, as a result of her fear that she will be unable to find a new tenant and so will lose rental income. The landlord is demanding to be paid £2000 by the client's sister, her guarantor. In addition, the landlord has subjected the client and her sister to threatening messages. The client has reported this harassment to the police, who advised her she can only take civil action.

Conclusion

This case highlights a typical case of disrepair in the PRS, and illustrates why tenants are often reluctant to seek redress - they risk retaliation from landlords via eviction or, as in this case, harassment and attempts to prevent the tenant from moving to a new home.

Case Study 2

A female tenant contacted Citizens Advice Haringey in April 2020 regarding issues with her HMO. The client had recently moved into a registered HMO property licensed for nine occupants. There are currently ten tenants in total, including four couples. Before moving in, the client was shown the property via video viewing due to covid restrictions. The client's tenancy agreement states the landlord's agency will be responsible for discretionary cleaning of the communal area.

The communal areas were dirty when the client moved in, and cleaners have not attended the property since the client moved in. The client was told that cleaners could not come due to pandemic restrictions. The client has also discovered a leak in her ceiling, which resulted in damp and mould appearing in her bedroom. Again, the landlord claimed that repairs were not possible due to the pandemic restrictions. The client has been suffering from respiratory problems due to the mould. When she complained about this to her landlord, the client was told to keep her window open at night, despite the cold.

In July 2020 the same client approached Citizens Advice Haringey again. The client had been on furlough and was facing imminent redundancy as a result of the lockdown. The client therefore wished to move to cheaper housing. The landlord cited a clause in the tenancy agreement to stop the client from ending the tenancy. The client believed she could move out prior to November 2020, before the clause came into force, and expressed concern about the lack of information that was given to her at the beginning of the Assured Shorthold Tenancy.

Conclusion

This case demonstrates how the pandemic restrictions could exacerbate disrepair and maintenance problems in the PRS. It also shows how uncertainty regarding tenancy agreements can complicate the process of moving house.

3. Improving the Private Rented Sector in Haringey

How can standards in Haringey's PRS be improved? As research by [Citizens Advice](#) and [Shelter](#) has argued, central government must lead efforts to improve the PRS in England. Action by local authorities and third sector organisations will not be sufficient: Acts of Parliament will be essential to any attempts to comprehensively reform the PRS. Citizens Advice is keenly aware of the pressure that has been placed on Haringey Council as a result of cuts to central funding since 2010, and this report does not claim that the local authority is capable of providing a panacea for all PRS-related issues. However, national reforms to the PRS are beyond the scope of this report, and as this section will show, there are measures that local authorities can take to improve conditions in the local PRS.

One such measure is to broaden the scope of the local landlord licensing scheme so that more private landlords are required to obtain a license in order to let their property. This is the strategy that has been pursued by Haringey Council in recent years. In May 2019

Haringey introduced an additional licensing scheme which requires all landlords seeking to let a house in multiple occupation (HMO) to first obtain a license. Haringey is also currently seeking to implement a selective licensing scheme, which would require all private landlords in 14 of the borough's 19 wards to obtain a license in order to let their dwelling. The potential benefits of the proposed scheme are summarised in the [Evidence Report](#). As the government's 2019 [Independent Review of the Use and Effectiveness of Selective Licensing](#) made clear, these schemes can improve standards in the PRS for the following reasons:

- Selective licensing schemes result in inspections of more properties, which leads to more enforcement action and builds local authority knowledge about the PRS.
- Selective licensing schemes clearly define PRS-related offences for licensed landlords, which simplifies enforcement. This clear guidance also helps landlords to understand their responsibilities.
- Selective licensing schemes offer tenants an uncomplicated means by which to identify and seek enforcement against unlicensed landlords. Where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences.
- There is no 24-hour notice requirement for access before an inspection for licensing purposes. This is particularly important where rogue landlords are operating.
- Income from the licensing scheme will enable the council to employ new staff with PRS-related expertise.

Citizens Advice Haringey strongly supports Haringey Council's efforts to broaden its landlord licensing scheme, via both the additional and proposed selective licensing schemes. However, an examination of local authority enforcement statistics in London shows that while a selective licensing scheme could enable more action to regulate the PRS, it should not be seen as sufficient by itself as a means of improving standards.

Table 2 underscores the need for increased enforcement action in Haringey. Based on Freedom of Information requests made by [Generation Rent](#), it shows the number of enforcement actions taken by each local authority in London in 2018-19 (for a more comprehensive set of statistics covering the years 2017-18 to 2019-20, consult the [raw data](#) provided by Generation Rent). The data shows that despite its large population of private

renters, Haringey council rarely engages in actions to enforce standards in the private rented sector. Haringey is not unique in this respect: the numbers of improvement notices it issued and prosecutions it successfully served are close to the London average. However, this is not true with regard to civil penalties: since adopting civil penalty powers in February 2019, Haringey has yet to issue a single notice of intent relating to civil penalties for housing offences, while London councils issued an average of 31 such notices in the year 2018-19. Haringey council likewise issued no rent repayment orders in 2019-20 and 2018-19. Moreover, Haringey's enforcement figures lag far behind a number of local authorities including Brent, Camden and Newham. What explains this disparity, and does it offer an insight into the efficacy of selective licensing schemes?

As would be expected, Table 2 suggests that more comprehensive licensing schemes can contribute to higher enforcement numbers. Councils which have neither additional nor selective schemes typically engage in few enforcement actions. This is true even in boroughs like Westminster, Wandsworth and Lambeth, which have large private renter populations. By contrast those councils with high enforcement numbers, such as Newham and Brent, typically operate additional or selective schemes, or both types of scheme simultaneously.

However, it is also clear that more comprehensive licensing schemes do not, on their own, result in higher levels of enforcement. A number of councils, including Hackney and Hammersmith and Fulham, report average or low levels of enforcement despite operating additional and selective schemes. Haringey's enforcement numbers in 2019-20, which were lower than in 2018-19, suggest that the adoption of an additional licensing scheme in May 2019 has not yet led to increased levels of enforcement by the council. In addition, Croydon - which only operates the mandatory HMO licensing scheme - issues many improvement notices, while Camden - which operates an additional licensing scheme but no selective licensing scheme - utilises all forms of enforcement frequently.

Energy efficiency regulation in the Private Rented Sector

Approximately a third of Haringey residents live in the private rented sector. The Haringey Housing Strategy 2017-2022, sets out an ambition to improve the quality of reliability of properties in the private rented sector, yet the energy efficiency of properties in Haringey remains a concern. Parts of the Borough including West Green and Bruce Grove also have a high proportion of Houses in Multiple Occupation (HMOs), with 10.2% of residents residing

in this property type.¹ There are currently two policies which seek to improve the energy efficiency of a privately rented property.

All domestic landlords are required to comply with Minimum Energy Efficiency Standards (MEES). This means a landlord is unable to let or continue to let a property with an Energy Performance Certificate (EPC) below Band E. However, should it cost more than £3,500 to bring a property up to this standard, the landlord is able to register for an exemption which lasts for five years. There are a range of funding options available, including self-funded, local authority grants, Energy Company Obligation and Green Deal finance. The latter third-party forms of funding are not subject to a cost cap.²

The Housing Act 2004, gives local authorities the power to take direct action against a landlord or building owner by undertaking a health and housing safety rating system (HHSRS) assessment. This is an evaluation tool used to determine risk of harm to the occupier(s) as a result of the dwelling.³ The local authority can take action in a range of ways:

- **Improvement notice.** The property owner can undertake works at their own expense or, should the local authority take action without agreement, it is able to recover reasonable expenses with interest.
- **Prohibition notice.** Prohibiting the use of part or all of the property.
- **Hazard awareness notice.** For less serious risks but those which require some attention from the property owner.
- **Emergency remedial action or emergency prohibition order.** Emergency enforcement for hazards which pose an immediate risk of harm.
- **Demolition order.**
- **Clearance order.**⁴

¹ Haringey Council (2017) '[Haringey's Housing Strategy 2017-2022](#)'.

² Department for Business, Energy and Industrial Strategy (2020) '[Domestic private rented property: minimum energy efficiency standard - landlord guidance](#)'.

³ Ministry of Housing, Communities and Local Government (2019) '[Local authority enforcement powers under the Housing Act 2004](#)'.

⁴ Ministry of Housing, Communities and Local Government (2006) '[Housing health and safety rating system \(HHSRS\) enforcement guidance: housing conditions](#)'.

4. Recommendations

A comparison of local authority enforcement statistics in London suggests that while more comprehensive licensing systems can facilitate an increase in enforcement, there are other important factors which contribute to higher enforcement numbers and improved standards in the PRS. We therefore offer the following recommendations as to how the selective licensing scheme can be implemented effectively, along with other proposals to improve the PRS in Haringey:

- **Citizens Advice Haringey supports Haringey Council's proposed selective licensing scheme. Haringey Council must dedicate significant resources to the scheme.** As noted by the [Independent Review](#), a poorly-resourced scheme may be ignored by many landlords and incapable of securing an increase in enforcement. New, skilled staff must be employed to carry out property inspections and enforcement actions. Citizens Advice therefore welcomes Haringey council's proposal to employ fifteen additional staff members to administer the selective licensing scheme, which would represent a marked improvement on the six field officers able to undertake enforcement work in 2020. There is a real danger that the costs of administering the scheme can be underestimated: the [Independent Review](#) found that only 43% of local authorities with selective licensing schemes were able to fund their scheme through license fees alone.
- **Haringey Council must clearly communicate to both landlords and tenants their rights and responsibilities under the selective licensing scheme.** Selective licensing will only be fully effective if both tenants and landlords are well-informed about the scheme. In this regard it is important to work with organisations, like Citizens Advice Haringey, who may be able to communicate the scheme effectively to residents.
- Councils have significant discretion regarding their enforcement strategy, regardless of their licensing regime. For instance, depending on the severity of the offence, they may opt to respond with informal actions or choose from a range of formal enforcement mechanisms. **This enforcement strategy must be clearly spelled out and consistently implemented.**
- **Haringey Council should establish and publicise clear and measurable targets regarding the aims of its selective licensing scheme and broader approach to**

the PRS. For example, the [Independent Review](#) (see p.27) quotes some of the targets adopted by other local authorities when implementing their selective licensing schemes.

- **Data regarding the effects of the selective licensing scheme should be compiled and published regularly.** This will allow Haringey residents and third sector organisations to assess the impact of the scheme. It will also enable the council to assess whether its targets are on course to be achieved, and by extension whether or not the current approach to implementing the scheme should be tweaked or overhauled. By regularly compiling and publicising data on the PRS, Haringey Council can gain a greater sense of whether its approach to enforcement is effective or in need of adjustment.
- **A commitment to comprehensive data compilation** and publication will also contribute to a better-informed discussion as the additional and selective licensing schemes approach their expiry dates. This will give the council a better understanding of whether or not it would be viable to expand the selective licensing scheme to encompass the five wards which will be excluded under current plans for the scheme.
- **Haringey council should ensure migrant welfare is prioritised when implementing its selective licensing scheme.** Research by [Shelter](#) (see pp.30-31) shows that selective licensing schemes can encourage collaboration between council PRS teams and immigration enforcement teams, with licensing-related property inspections leading to raids on tenants whose immigration status is unclear. Haringey Council's [Evidence Report](#) advocates selective licensing on the grounds that it can encourage 'joint working' between the local authority and agencies including 'border control / immigration'. An approach to selective licensing which prioritises this kind of collaboration would contradict the primary aim of the selective licensing scheme, which is to improve standards in the PRS. Migrants with unclear immigration status are particularly vulnerable to poor treatment by rogue landlords, and so migrant tenants are often forced to live in overcrowded, poorly maintained housing. If migrant tenants view the selective licensing scheme as a tool of the immigration authorities, they will be unlikely to use it to address their housing issues, and may lose faith in Haringey Council's other services. A selective licensing scheme which strengthens joint-working between the local authority and immigration agencies may also contradict the [Welcome Strategy](#), in which Haringey

Council pledged to 'enhance [the] safety and security of migrant communities' by improving their housing security and preventing homelessness among migrants.

- **Citizens Advice Haringey welcomes the proposed requirement of MEES** to bring up a properties EPC of Band C by 2028, but should be enforced in a more timely manner.
- We welcome proposals to increase the cost cap of MEES to £10,000. **However, a £15,000 cap would go further in achieving the aims of the regulation.** The government may wish to make sure low or no cost financial support is available to landlords to reduce any risk to housing affordability and availability.
- **Haringey Council could consider aligning action on energy efficiency with commitments for net zero by 2050** to ensure this target is met
- **The Greater London Authority could support local authorities by aggregating data on licensing and enforcement of MEES and HHSRS.** This would provide Haringey Council with a cost analysis of the benefits of enforcement.
- **Haringey Council may choose to commission a relevant third party to enforce non compliance.**
- **The government should provide greater clarity** on the undefined difference between MEES, whereby landlords are exempt based on improvements incurring financial costs, and HHSRS, whereby action can be taken against a landlord for providing inadequate housing.

Table 2. Number of PRS-related enforcement actions carried out by London local authorities, 2018-19

Local authority	2019 PRS population (households)	Licensing schemes	Improvement notices issued	Successful prosecutions of landlords or agents for PRS-related offences served by council	Notices of intent relating to civil penalties for housing offences imposed by council
Havering	11,864	Additional	13	0	132
Bexley	12,069	Selective	6	2	0
Sutton	13,029	Mandatory only	6	0	0
Barking & Dagenham	14,357	Additional and selective	77	12	12
Kingston upon Thames	15,880	Additional	0	0	9
Richmond upon Thames	17,306	Mandatory only	7	1	4
Bromley	18,310	Mandatory only	7	0	0
Merton	19,536	Mandatory only	58	0	0
Harrow	20,036	Selective	5	4	Not recorded
Hillingdon	21,486	Mandatory only	31	0	4
Greenwich	22,159	Additional	12	0	7
Redbridge	24,688	Additional and selective	35*	11*	315*
Hammersmith & Fulham	25,047	Additional and selective	9	0	0
Hounslow	25,586	Additional	6	3	2
Kensington & Chelsea	27,669	Mandatory only	2	0	0
Waltham Forest	28,612	Selective	19	13	46
Enfield	28,848	Mandatory only	44	1	0
Islington	30,444	Additional	42	7	10

Lewisham	31,431	Additional	53	4	0
Croydon	31,948	Mandatory only	256	0	8
Southwark	33,046	Additional and selective	35	8	0
Hackney	33,121	Additional and selective	17	0	0
Ealing	34,086	Additional and selective	101	4	0
Haringey	36,025	Mandatory only †	46	4	0
Brent	37,166	Additional and selective	146	31	87
Barnet	38,533	Additional	2	6	13
Camden	38,552	Additional	54	60	123
Lambeth	38,898	Mandatory only	16	3	0
Wandsworth	42,203	Mandatory only	20	0	5
Tower Hamlets	42,560	Additional and selective	13	5*	3*
Newham	44,607	Additional and selective	106	46	172
Westminster	47,973	Mandatory only	25	3	4
London Average	28,346		40	7	31

Source: Enforcement numbers were compiled by [Generation Rent](#), which sent Freedom of Information requests to all local authorities in London. PRS population numbers are from the [Office for National Statistics](#).

* As 2018-19 data was unavailable, data from 2019-20 has been used

† An additional licensing scheme was introduced in Haringey in May 2019

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