

**Wirral Council**

**Selective Licensing Business Case**

**October 2014**

**Draft**

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## **1 Forward**

Since 2001, Wirral has seen a significant increase in its private rented sector of nearly 80%. This represents both an opportunity to create a strong and sustainable housing market and offer for the Borough but also a challenge in that some of these properties are being poorly managed and are in areas with higher rates of private rented stock, suffering low demand, criminal damage, high turnover and empty properties which are all directly affecting the local neighbourhood.

By 2026 Wirral wants to see a healthy private rented sector with good quality properties and management standards. In order to achieve this there is a need to address some of the housing and related social issues which continue to affect areas especially those which are linked significantly to the private rented sector. Many landlords act responsibly and Wirral has worked in partnership over a number of years to drive up standards through the Landlord Accreditation Scheme where in total 3,752 properties have been accredited. Whilst this is impressive we need to do more. Some landlords still do not take responsibility for how their properties are managed and many tenants do not act in an acceptable manner to their neighbours and the wider community.

We will continue to use existing powers we have available to tackle irresponsible landlords and tenants and at the same time offer support and assistance to improve conditions and management practices. We are committed to building on our existing relationships with those landlords operating in the Borough, particularly those who own stock in the four areas identified with the highest percentage of private rented properties in the borough, are considered to be low demand and suffer from a high level of other socio economic factors.

It is within these distinct areas that we intend to introduce selective licensing, making a clear commitment to tenants, residents and stakeholders in these neighbourhoods to make a positive change for the future by driving up management standards and practices thus achieving our long term vision for 2026.

***Councillor George Davies Wirral Council, Cabinet Member for Neighbourhoods, Housing and Engagement***

## 2 Executive Summary

Wirral has a growing private rented sector within its housing market. There are around 23,000 privately rented properties in Wirral<sup>1</sup> and the sector is vital in meeting borough's housing needs, so it is important that what is on offer is of high quality.

Although many landlords operate professionally, Wirral Council is concerned about a number of landlords who rent properties that fail to meet satisfactory standards of tenancy and property management.

Almost one in three properties within Wirral's private rented sector fail to meet the Decent Homes Standard. This has a detrimental impact on the health and welfare of local communities. It also impacts negatively on a housing market that is already vulnerable in terms of vacant properties, low house prices and depressed rental values.

Poorly managed properties can lead to problems such as low demand, anti-social behaviour, fly-tipping, and can cause blight on the borough's neighbourhoods. Wirral Council wants to ensure that it has a good quality private rented sector, that tenants can be confident in, and believes that a Selective Licensing Scheme can play a major part in helping achieve this.

Selective Licensing is a scheme where all private landlords within a defined boundary must have a license before they can let a property out. The License will have conditions attached to ensure the properties are in good condition, safe and well managed.

For Wirral to be able to declare a Selective Licensing Scheme it must prove that there are areas of low demand or high levels of anti-social behaviour. This document makes the case for introducing Selective Licensing within 4 small geographical areas which the evidence shows are experiencing the worst symptoms of low demand and associated socio-economic factors in the Borough

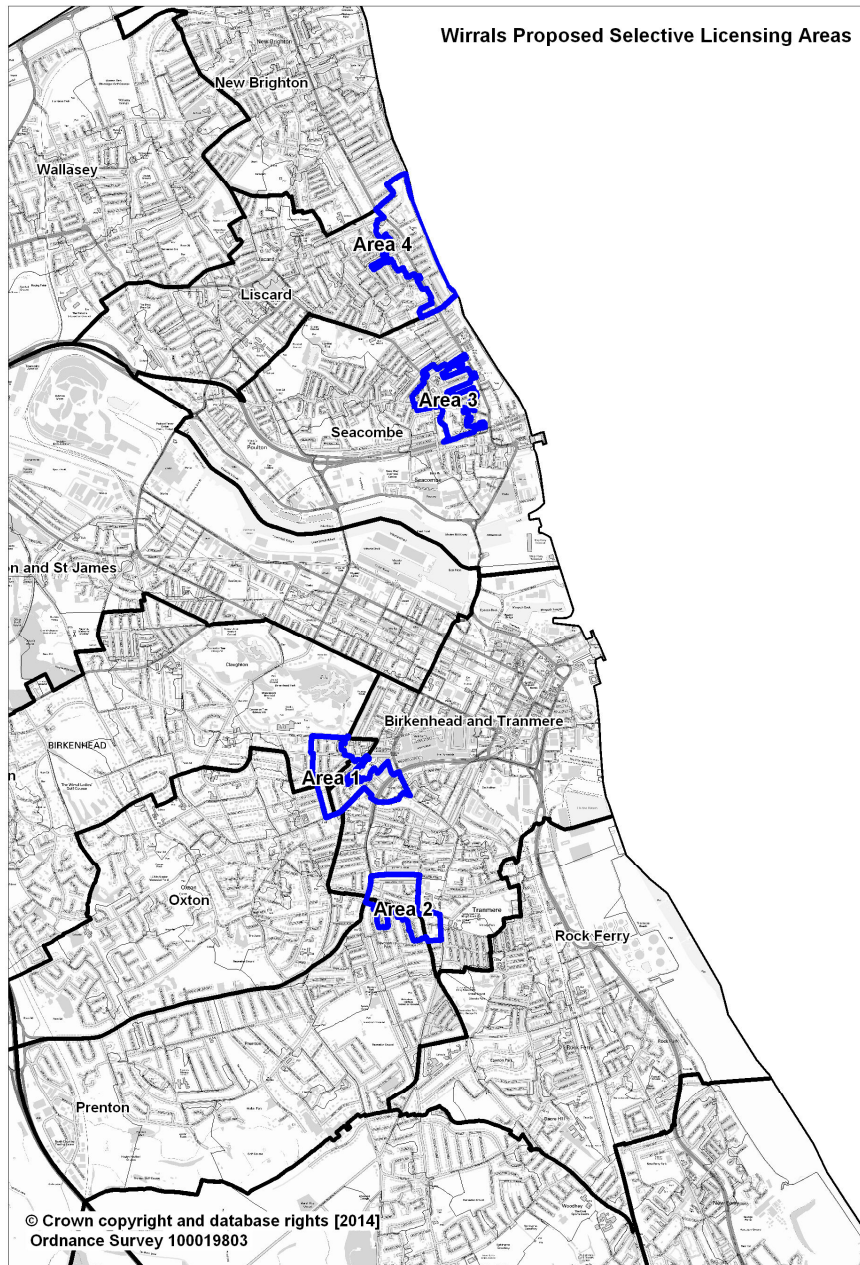
Wirral is therefore undertaking a consultation exercise to ensure that everyone who is likely to be affected by a proposed scheme has an opportunity to express their views and understands the rational or 'business case', which supports the introduction of a scheme. Information about different ways to participate in the consultation are set out in the Consultation Plan in Appendix 3.

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<sup>1</sup> 2011 Census, Office for National Statistics

### 3 Introduction

This is the Business Case to support the proposal for the introduction of Selective Licensing Schemes in four small areas of the Borough shown outlined in blue below.



These areas have been identified through an evidence-based approach using research collated by the Council's Performance and Public Health Intelligence Team. It is in these four areas that the Council wants to pilot Selective Licensing with a view to rolling out the scheme to other areas once the impact of these first areas have been fully evaluated.

Some key aspects of this evidence have been incorporated into Section 5 of this report, however a full breakdown of the methodology and findings of the evidence base can be found in Appendix 1 together with a matrix combining all the data-sets for the worst Lower Super Output Areas (LSOAs) for the Borough. The evidence, demonstrates that there is a clear link between high levels of private rented properties in the proposed selective licensing areas and low demand with it's associated socio-economic issues, as well as evidence of issues caused by the poor management of private rented properties.

Larger maps of each proposed designated area, together with a list of streets / properties included in the proposed areas are shown in Appendix 2.

#### 4 Strategic Housing Context

The Council has in its Housing Strategy 2011-2026 been clear that it needs to focus on responding to changes in the long term population of Wirral, to make better use of existing stock and to improve the quality of housing, providing a greater choice. The core theme running through each of these is the need to ensure Wirral responds to the different needs and aspirations of individuals and communities, enabling Wirral residents to thrive and achieve their full potential by working to narrow the inequalities gap.

Wirral's Strategy further sets out that the private rented sector has many advantages such as flexibility and ease of access, however it often contains many vulnerable households, has the least security of tenure, has twice as many people living in the private rented sector living in hazardous homes than the owner occupied sector and a third of all private rented homes are non decent. By 2026 Wirral wants to see a healthy private rented sector with good quality properties and management standards. Pressure on the availability of social rented homes means that supporting people to consider all available housing is essential and a good quality private rented housing offer is fundamental in meeting this.

Local Strategy / Policy	Relevant aim of strategy / policy	What Will Selective Licensing Contribute
Corporate Plan 2014-2016	Investing in Our Future	Selective Licensing contributes to addressing the need for quality, affordable and safe homes which in turn assists in driving forward improvements to the quality of life, health and levels of achievement for our residents.
Housing	Responding to changes	With the large increases in

<p>Strategy 2011-2026</p>	<p>in the long term population.</p> <p>Making better use of existing housing stock across all sectors</p> <p>Encouraging people to stay within the borough</p>	<p>single-person households set to continue and the above average increases forecast in those aged 25-34, there is likely to be an increasing demand for private rented homes. Selective Licensing will help to ensure these homes are managed well and of good quality.</p> <p>Selective Licensing will help to increase demand for housing in the proposed LSOAs and help to reduce the rate of long term empty dwellings in those areas.</p> <p>Selective Licensing will help to increase property standards within the private rented sector thereby creating attractive and desirable neighbourhoods with stable communities where people will chose to live. Compliance visits will identify and address excess cold and other hazards in the home</p>
<p>Private Sector Housing Financial Assistance Policy</p>	<p>Assisting vulnerable households to remain in their homes by removing hazards, relating to disrepair, improving their affordable warmth and bringing long term empty properties back into use.</p>	<p>Selective Licensing will help to identify those in need of assistance and target resources where they are needed most to generate improvement to the quality of the housing stock in these areas, generate confidence and protect vulnerable residents.</p>
<p>Homelessness Strategy</p>	<p>Increasing Access to the Private Rented Sector</p>	<p>Licensing will contribute in the development of a suitable private rented sector offer for all client groups, including advice</p>



		and support to both clients and landlords. In addition, following the Localism Act 2011, the Council is now able to discharge its homeless duty in the private rented sector; good quality private rented sector stock will increase the range of properties available to carry out this duty.
Affordable Warmth Implementation Plan	Improve the energy efficiency of housing	Better quality private rented housing will lead to increased energy efficiency levels. Improving home energy efficiency is a key long-term tool in reducing fuel poverty.

## 5 Wirral's Socio Economic & Housing Profile

### *Population*

Wirral has a population estimated at 320,300 as at mid-2013<sup>2</sup>. Between 2003 and 2013 the Borough's population increased by 2.1%, reversing the population decline experienced between 1991 and 2002<sup>3</sup>. However the rate of growth has been slower than that of the UK which was 7.5%<sup>4</sup>.

### *Age Profile*

Wirral's population profile differs from that of England, the North West and of Merseyside. It has a larger population of older people, both those aged 65-84 and those aged 85 and over<sup>5</sup>.

Area	0-14	15-44	45-64	65-84	85 and over
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<sup>2</sup> Wirral Compendium of Statistics 2014, Public Health, Wirral Council.

<sup>3</sup> Wirral Compendium of Statistics 2014, Public Health, Wirral Council.

<sup>4</sup> 2013 Annual Mid-year Population Estimates, Office for National Statistics, 2014

<sup>5</sup> 2013 Annual Mid-Year Population Estimates, Office for National Statistics, 2014

Wirral	17.3%	35.0%	27.5%	17.5%	2.7%
Merseyside (Met County)	16.5%	39.1%	26.2%	15.9%	2.2%
North West	17.6%	38.9%	25.9%	15.4%	2.2%
England	17.8%	39.7%	25.2%	15.0%	2.3%

The predicted change in age profile from 2012 to 2021 reflects the predictions for the North West and England in that there is likely to be a significant growth of the older population. However, Wirral is predicted to have a higher rate of growth than the North West and England of those aged 25-29 and 30-34 (3.89% and 12.00% respectively)<sup>6</sup>. In Wirral, this is currently the largest age group currently living within the private rented sector<sup>7</sup> and could therefore result in further increases in demand for private rented properties.

The table below shows the age profile of the proposed areas for selective licensing as recorded by the 2011 Census<sup>8</sup>. All areas exhibit a younger age profile than the Wirral average.

Area	0-14	15-44	45-64	65-84	85 and over
Egremont Promenade South	19.6%	36.7%	24.4%	15.8%	3.6%
Egerton North	18.7%	46.1%	24.3%	9.5%	1.5%
Seacombe Library	23.3%	43.0%	21.3%	11.3%	1.2%
Birkenhead South	19.7%	43.6%	24.5%	11.3%	0.8%

The table below shows the changes in the population and age profile, between the Censuses of 2001 and 2011, of the proposed areas compared to Wirral, the North West and England. It shows large population increases in Egremont Promenade South and Birkenhead South, which reflects the large increase in the number of single-person households in these areas (30.8% and 43.2% increases respectively from 2001 to 2011 compared to an increase of 9.9% across Wirral). It also shows a growth in the younger population (aged 15-44) in Egremont Promenade South, Birkenhead South and Egerton North.

<sup>6</sup> Population Projections Unit, Office for National Statistics, 2014.

<sup>7</sup> Wirral Private Sector Stock Condition Survey 2013

<sup>8</sup> Age by Single Year, (QS103EW), Office for National Statistics, 2011

Area	All people	0-14	15-44	45-64	65-84	85 and over
	Percentage change between 2001 and 2011					
Egremont Promenade South	17.44	7.59	11.85	53.15	-0.40	48.72
Egerton North	0.08	-14.54	8.38	5.37	-11.51	-17.39
Seacombe Library	-0.47	-13.13	-4.37	23.14	11.33	-10.53
Birkenhead South	15.86	8.83	16.38	18.58	20.41	30.00
Wirral	2.40	-8.24	-1.91	13.12	6.16	19.13
North West	4.79	-4.89	2.92	13.01	7.40	19.86
England	7.88	1.02	5.64	15.23	9.14	23.70

### Empty dwellings

The measurement used to assess the prevalence of empty dwellings in an area is dwellings that have been unoccupied and substantially unfurnished for over six months. These are known as long-term vacant dwellings. The rate of long-term vacant dwellings in Wirral in 2013 was the 2<sup>nd</sup> highest in Merseyside and was above the average for Merseyside and for England, as shown in the table below.<sup>9</sup>

Area	Rate of long-term vacant dwellings
Knowsley	1.38%
Liverpool	1.75%
St Helens	1.37%
Sefton	1.51%
Wirral	1.60%
Merseyside	1.58%
England	0.98%

As of April 2014, the rates of long-term privately owned vacant dwellings for the proposed Selective Licensing areas were as shown in the table below<sup>10</sup>. It shows three of the target areas have higher rates of long term private vacants than the Borough as a whole.

Area	Rate of long-term privately owned vacant dwellings
Birkenhead South	2.74%
Seacombe Library	5.19%
Egerton North	0.83%
Egremont Promenade South	5.87%
Wirral	1.46%

<sup>9</sup> Table 615, Vacant Dwellings by Local Authority District, Department for Communities & Local Government, June 2014.

<sup>10</sup> Council Tax data, Wirral Council, April 2014

## **Health Inequalities and Deprivation**

The main cause of health inequalities is poverty and income inequality. Living in poverty is closely related to other factors that influence health such as education, living environment, employment and lifestyle. Housing is known as one of the “wider determinants of health” which influences people’s living environment.

In 2010-12, life expectancy in Wirral was 77.9 years for men and 81.9 years for Women. This is slightly higher than for the North West but lower than that for England<sup>11</sup>. Wirral had the widest inequalities in DFLE (Disability Free Life Expectancy) of any local authority in England in 2012. Men living in the most deprived areas of Wirral can expect to spend 20 more years of their lives living with ill-health or disability than men living in the most affluent areas. For women, the difference is 17.1 years<sup>12</sup>.

The table below shows that the proposed areas for selective licensing all score worse than the average for the Borough on the Index of Multiple Deprivation (IMD)<sup>13</sup>. They are also all within the top 5% of deprived LSOAs in England and Wales.

Area	Score	IMD Rank
Birkenhead South	65.01	469 out of 34,753
Seacombe Library	62.82	610 out of 34,753
Egerton North	58.35	1003 out of 34,753
Egremont Promenade South	53.10	1676 out of 34,753
Wirral average	26.84	60 out of 326

The IMD is made up of seven individual ‘domains’ (or different dimensions of deprivation) which together make up the overall IMD. One of these domains is “Health, Deprivation & Disability” which measures premature death and the impairment of quality of life by poor health and considers both physical and mental health. Another domain, ‘Living Environment’ measures the quality of individuals’ immediate surroundings, including housing quality. The scores and ranks for these two domains for the proposed areas for selective licensing are in the table below. The areas are ranked within the top 3% of LSOAs nationally for

<sup>11</sup> Office for National Statistics, 2014

<sup>12</sup> Health Inequalities, Wirral JSNA, October 2012.

<sup>13</sup> Indices of Deprivation 2010, Super Output Areas, Neighbourhood Statistics, Office for National Statistics

Health, Deprivation and Disability and within the top 8% of LSOAs nationally for Living Environment.

LSOA	Health, Deprivation and Disability		Living Environment	
	Score	Rank out of 34,753	Score	Rank out of 34,753
Birkenhead South	2.17	189	51.70	2206
Seacombe Library	1.81	649	58.15	1305
Egerton North	1.87	535	61.71	921
Egremont Promenade South	1.74	776	50.26	2475

### **Household Incomes**

Data from 2013<sup>14</sup> (see table below) shows that in Wirral, the average annual earnings for full-time employees **living** in Wirral are higher than the North West average, at £26,697 Wirral has the highest earnings for employees in the Liverpool City Region. However, earnings for full-time employees **working** in Wirral are significantly lower than the North West and Great Britain. Wirral has the third lowest median earnings by workplace in the Liverpool City Region at £24,159 per annum. However, the difference in performance between people living and working in Wirral implies that people living in Wirral are accessing high value employment outside of the borough and people working in Wirral are not in as highly paid employment.

Area	Average Annual Pay (workplace)	Average Annual Pay (resident)
Halton	£25,221	£25,101
Knowsley	£26,524	£23,292
Liverpool	£26,786	£24,805
Sefton	£23,368	£25,546
St Helens	£23,355	£24,887
Wirral	£24,159	£26,697
North West	£25,097	£25,300

<sup>14</sup> Annual survey of hours and earnings 2013, Office for National Statistics via Nomis

Great Britain	£27,110	£27,126
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Although performing well in comparison to the Liverpool City Region authorities, Wirral continues to have a higher percentage of people claiming out of work benefits than the regional and national averages with high concentrations in deprived areas. Wirral currently has 29,580 people claiming out-of-work benefits (February 2014 latest data<sup>15</sup>); this includes Job Seekers, Incapacity Benefit/ESA and other income related benefits. This is approximately 15.1% of the working age population and has decreased by 0.6% since November 2012.

### **Fuel Poverty**

The official definition of fuel poverty using the Low Income High Costs (LIHC) indicator defines a fuel poor household where:

- They have required fuel costs that are above average; and
- Were they to spend that amount, they would be left with a residual income below the official poverty line.

Nationally, 19% of private rented households are defined as fuel poor. This is higher than in both the social rented sector (10%) and the owner occupied sector (8%)<sup>16</sup>. In Wirral, it is estimated that fuel poverty affects 19% of private rented households compared to 13% of owner occupied households<sup>17</sup>.

The rates of fuel poverty within the proposed areas for selective licensing compared to the Wirral and English averages are as follows:

<b>Area</b>	<b>Rate of fuel poverty</b>
Birkenhead South	19.7%
Seacombe Library	16.6%
Egerton North	16.6%
Egremont Promenade South	17.9%
Wirral	11.1%
Liverpool City Region	11.9%
England	10.4%

<sup>15</sup> Office for National Statistics via Nomis

<sup>16</sup> DECC 2012 Fuel Poverty Statistics, June 2014

<sup>17</sup> Wirral Private Sector Stock Condition Survey 2013

The main drivers of fuel poverty are income, fuel prices and energy efficiency. The depth and likelihood of being fuel poor increases markedly with lower energy efficiency levels. In 2012, 35 per cent of English households living in G-rated properties were fuel poor compared to only two and seven per cent living in A/B/C and D-rated properties respectively<sup>18</sup>.

### **Housing Stock Profile**

#### Number of households

The table below shows information from the 2001 Census and the 2011 Census. It shows that there has been around a 6% increase in the number of households in both Egremont Promenade South and Birkenhead South, above the Wirral average increase of around 1%. This reflects the large increase in the number of single-person households in these areas (30.8% and 43.2% increases respectively from 2001 to 2011 compared to an increase of 9.9% across Wirral). This increase is reflected in the percentage of converted / mixed use flats being significantly higher in these areas. In Egerton North and Seacombe Library there have been decreases of around 3%.

	2001	2011	% change
Egremont Promenade South	740	784	5.95
Egerton North	632	612	-3.16
Seacombe Library	680	658	-3.24
Birkenhead South	718	761	5.99
Wirral	139221	140583	0.98

#### **Tenure breakdown**

The 2011 Census reported that 15.8% of Wirral's households rented privately (22,275). This has significantly increased since 2001 when it was 8.8%. The tenure breakdown in the proposed areas, in Wirral<sup>19</sup> and in England<sup>20</sup> in 2011 was as follows:

<sup>18</sup> DECC, Annual Fuel Poverty Statistics Report, 2014

<sup>19</sup> Tenure - Households 2011 (QS405EW), ONS, 2012

<sup>20</sup> 2011 Census: Table KS402EW Tenure, ONS, 2012

The table above shows that private rented households account for over a third of the housing stock in the proposed LSOAs, far above the rate for the whole of the Borough.

Area	Owner Occupied		Social rented		Private Rented		Other	
	No.	%	No.	%	No.	%	No.	%
Birkenhead South	235	30.9%	222	29.2%	287	37.7%	17	2.2%
Seacombe Library	273	41.5%	141	21.4%	235	35.7%	9	1.4%
Egerton North	252	41.2%	122	19.9%	231	37.7%	7	1.1%
Egremont Promenade South	283	36.1%	196	25.0%	293	37.4%	12	1.5%
Wirral		67.5%		15.2%		15.8%		1.5%
England		63.3%		17.7%		16.8%		2.2%

### **Housing Types**

The 2013 Private Sector Stock Condition Survey for Wirral estimates that the private rented sector in Wirral is mainly terraced houses at 42.8%, compared to 24.8% in Wirral's housing sector as a whole<sup>21</sup>. Semi-detached houses make up the second biggest house type in the private rented sector at 24.7% (41.0% for all tenures), followed by purpose-built flats at 15.4% (11.8% for all tenures), converted and mixed-use flats at 14.3% (4.3% for all tenures) and detached houses at 2.7% (16.7% for all tenures). The table below shows a much higher proportion of converted / mixed use flats in two of the proposed Selective Licensing areas and with the stock condition survey highlighting the fact that 53% of converted / mixed use properties are non-decent, suggesting that stock condition in these areas is likely to be a cause for concern. There are also higher levels of terraced stock compared with significantly lower levels of detached and semi-detached properties.

The breakdown of house types for the proposed LSOAs compared to Wirral as a whole is as follows (all tenures):

Area	Detached	Semi-detached	Terraced	Purpose-built flat	Converted / mixed-use flat	Other
Birkenhead South	1.5%	24.4%	27.1%	23.2%	20.6%	3.2%
Seacombe	3.0%	13.4%	68.0%	6.1%	3.5%	6.0%

<sup>21</sup> Dwellings, Household Spaces and Accommodation Type, 2011 (KS401EW), ONS, 2012



Library						
Egerton North	2.9%	23.2%	52.9%	15.5%	4.8%	0.7%
Egremont Promenade South	4.7%	23.7%	34.3%	16.4%	15.1%	5.8%
Wirral	16.7%	41.0%	24.8%	11.8%	4.3%	1.4%

### ***Profile and Stock Condition of the Private Rented Sector***

The main findings from the Wirral 2013 Private Sector Stock Condition Survey with regards to the private rented sector were as follows:

- Over 40% of private rented dwellings were built before 1919, compared to 19% in the owner occupied sector;
- 40% of private rented dwellings are occupied by a head of household aged between 25 and 34;
- Just under 60% of private rented tenants had been resident in the property for under two years;
- 66% of private rented tenants were in full-time work and 12.3% were registered unemployed, in comparison to the owner occupied sector where the figures were 56% and 1% respectively;
- Rates of Category 1 Hazard failure under the Housing Health & Safety Rating System were significantly higher within the private rented sector at 19.9% of homes compared to 7.5% within the owner occupied sector;
- 32.0% of private rented homes did not meet the Decent Homes Standard, compared to 20.6% of owner occupied homes.

### ***Housing Demand***

As at 13th October 2014 there were 5,877 households registered with Property Pool Plus Wirral (the choice-based lettings system for social housing) that were currently renting from a private sector landlord and wishing to move to social housing.

The Property Pool Plus application form asks a series of questions in relation to the reasons why a household wishes to move from their current accommodation. The following table gives a breakdown of the reasons selected which directly relate to tenure for the 5,877 private sector tenants registered with the scheme (applicants may choose more than one reason):

<b>Reason for wishing to move</b>	<b>Number</b>
Threat of Eviction by Landlord	305
Repossession / Eviction	202
Unable to afford Rent	1,791
Landlord Selling Property	317
Home in poor condition	705

The Property Pool Plus application form also asks a series of questions in relation to any disrepair issues in the current accommodation. The specific questions and answers given by the 5,877 private tenants registered are shown in the table below:

<b>Questions relating to disrepair</b>	<b>Yes</b>	<b>No</b>	<b>Not Answered</b>
Are you living in a property in disrepair?	837	3,416	1,624
If yes, does the disrepair affect your health or safety?	594	854	4,429
Have you reported the disrepair to your landlord?	769	391	4,717
If yes, have you reported this to your Local Authority?	185	799	4,893

### **Rents and Sales Data**

The information in the following table is sourced from the Valuation Office Agency and provides data on monthly rents recorded between 1<sup>st</sup> April 2013 and 31<sup>st</sup> March 2014. It shows that the rents charged by Wirral's private landlords are higher than those charged in Liverpool and St Helens, higher than the Merseyside and North West averages but lower than those charged in Sefton and Knowsley and lower than the English average.

<b>Area</b>	<b>Average</b>	<b>Lower quartile</b>	<b>Median</b>	<b>Upper quartile</b>
Knowsley	£565	£497	£550	£625
Liverpool	£424	£295	£347	£500
Sefton	£556	£450	£550	£650
St Helens	£498	£425	£475	£550
Wirral	£541	£433	£525	£597
Merseyside	£497	£375	£475	£595

North West	£532	£410	£495	£600
England	£720	£465	£595	£795

### Rental data within proposed Selective Licensing areas to be inserted

The data in the table below refers to the total number of house sales for each of the proposed areas, compared to the total amount of private housing stock in that LSOA. The Wirral average was 10.90%, but as the table shows, three out of the four proposed areas had rates significantly lower than this. The same table also provides the average house prices for the proposed areas, showing that they were far below the average for the Borough.

Area	% sales 2008-12 as a proportion of private housing	Average house prices 2013/14
Birkenhead South	4.62%	£88,145
Egremont Promenade South	6.03%	£73,810
Egerton North	12.52%	£71,880
Seacombe Library	10.16%	£56,190
Wirral	10.90%	£161,200

The table below shows information from Zoopla, an advertising website which is used by some of the largest landlords and managing agents in Wirral<sup>22</sup>. It shows higher lettings and void rates for the proposed Selective Licensing areas compared to the Borough average. Longer time periods to let a property or a high lettings turnover can indicate low demand, instability and/or poor quality accommodation in an area.

Area	No. of lettings 2013/14	Combined weeks advertised prior to let 2013/14
Birkenhead South	11	179
Egremont Promenade South	10	120

<sup>22</sup> Zoopla Property Group, 2014

Egerton North	23	308
Seacombe Library	25	236
Wirral LSOA average	7	72

### ***Economic Circumstances***

Economic circumstances vary significantly between the owner-occupied and private rented sectors, with private rented households exhibiting higher levels of economic disadvantage. 34.2% of private rented households are economically vulnerable, compared to 17.3% of owner-occupied households. 58% of private rented households are on low incomes compared to 23.8% of owner-occupied households.<sup>23</sup>

### ***Business Activity***

Business start-ups are used as an indication of the level of entrepreneurial activity in an area. The business start-up rate per 10,000 of 16-64 year olds, a key measure of business activity, was less in Wirral than in the UK.

Figures on business stock per 10,000 16-64 year olds provide an indication of business density in an area, as well as the competitive pressures in an economy. Wirral's rate was less than that for the UK.

Business start-ups, closures and stock for Wirral compared to the UK are shown in the table below<sup>24</sup>.

<b>Area</b>	<b>Business Birth Rates per 10,000 16-64 yrs</b>	<b>Business Closures Rates per 10,000 16-64 yrs</b>	<b>Business Stock Rates per 10,000 16-64 yrs</b>
Wirral	49.9	43.7	414.2
UK	63.9	56.2	572.8

Birkenhead South area contains parts of the Oxtan Road and Grange Road West retail centres. Within the "Strategy for Town Centres, Retail and Commercial Leisure in the Borough" (the "RTP Report") which was produced for the Council in 2009, the Health Check Assessment reported that both retail centres were deemed to require major intervention to remain viable.

<sup>23</sup> Wirral Private Sector Stock Condition Survey 2013

<sup>24</sup> Liverpool City Region Evidence Report, Liverpool City Region Local Enterprise Partnership, August 2013.

Seacombe Library area contains part of the Seacombe retail centre which under the same report was showing significant signs of weakness or decline. The Seacombe (Poulton Road) Retail Action Plan produced by the Council in 2013 reports a vacancy rate amongst retail units of 24%. The 2011 Wirral Town Centre Strategy stated that one of the weaknesses of the Seacombe Retail Centre was a large number of poor quality residential conversions within the centre.

## **6 Why are Wirral introducing Selective Licensing?**

Over 18.6% of Wirral's private housing stock is privately rented which has increased from 13.8% in 2008. Evidence suggests that this sector is still growing and is currently unregulated. Whilst the housing conditions across the private sector are generally better than the national average in Wirral, where 77% of properties meet the decent homes standard, this rate falls to 68% in the private rented sector which is concentrated in the older, terraced and flatted housing stock. Decency levels fall to 58% in older pre-1919 properties with only 53% failing the decent homes standard in flats in converted buildings.

Wirral also has a high number of empty properties, which are concentrated in the older, terraced housing stock on the east side of the borough. Wirral has been targeting interventions in areas which have a high concentration of empty properties in recent years, but tackling this problem alone is unlikely to reverse the problem, particularly in areas which are experiencing other symptoms of low demand such as low house values and a high number of privately rented properties where the turnover households is high. This in turn contributes to a feeling of transience and instability in a neighbourhood.

Earlier this year, Wirral Council's Performance and Public Health Intelligence Team were commissioned to undertake research into a wide range of evidence from a variety of data sources to help identify areas of low demand where a Selective Licensing Scheme would be justified and where the Council could make a significant impact in specific neighbourhoods through the introduction of a scheme. The evaluation involved an analysis of 20 individual data sets (shown in appendix 1) including the number of long term empty properties, low sales values and sales rates, high numbers of private rented properties, a high turnover of private rented properties and longer than average times that privately rented properties took to be re-let as well of other socio-economic data that reflects areas suffering from low-demand.

Each of the indicators were scored between one and three points depending on their specific relevance to low demand as this is one of the main issues for which Local Authorities can apply for Selective Licensing. Consequently, all of the indicator measures used to indicate low demand were scored the highest.

All of the LSOAs in Wirral were ranked based on these indicators and the worst performing 10 LSOAs were entered onto a master matrix document. This

represented the worst 5% of LSOA in terms of the low demand criteria that was evaluated. The worst 5% of LSOAs was chosen to follow other Council interventions (e.g. Health Action Area initiative) that operate in the most deprived LSOAs.

The evidence highlighted four LSOAs that scored significantly worse than the other 5% LSOAs. The LSOA shown as scoring highest for low demand was Seacombe Library. Below this, three LSOAs scored very closely on the Matrix for low demand. These were Egremont Promenade South, Birkenhead South and Egerton North. There was a clear drop in scores with the next lowest LSOA after this, showing delineation between the worst 4 LSOA and the rest of the LSOAs on the matrix. This supported the proposal to declare 4 small selective licensing areas in each of the areas described above.

The Introduction of a Selective Licensing Scheme in specific, targeted areas of low demand would help to stabilise these neighbourhoods by declaring an intention to drive up property management practice and property standards in the private rented sector as well as aligning other interventions including targeted activity to help bring empty properties back into use, Healthy Homes and energy efficiency interventions. In addition, the use of Selective Licensing would help to solve other neighbourhood issues that are contributing to low demand within a neighbourhood through a multi-agency approach with wider public, community and voluntary sector stakeholders and residents within an area.

### ***What have we been doing to improve the Private Rented Sector?***

#### ***Property Accreditation***

Wirral has operated a Property Accreditation Scheme since 2003 which is a voluntary scheme where landlords can sign up to a code of standards and sets a minimum standard for property condition and management practice. Wirral has accredited 3,752 properties since the scheme began however due to the level of churn in the private rented sector, there are currently only 1,425 properties accredited. Whilst recognised as a successful scheme by other local authorities due to the high number of properties accredited, this still only represents just over 6% of the private rented stock in the borough. It also appeals to better landlords operating in the property market as these landlords are more willing to make the necessary investment in their properties to ensure their properties comply with the standards. The accreditation scheme also introduced a tenancy bond scheme, tenant referencing, landlord forums, newsletters and training events in an effort to support accredited landlords to let their properties in a responsible way.

Experience of running Wirral's accreditation scheme has demonstrated that poor landlords are unlikely to join a voluntary scheme, which is why the mandatory

approach using Selective Licensing powers is needed as an additional tool to address poor standards in the private rented sector.

### ***Empty Property Policy Approach***

The council also offers a range of options to aid property owners in returning their empty dwellings back into occupation.

An additional incentive for accredited landlords is the option of an Empty Property Grant for properties that have been empty for over 6 months. Whilst this assistance is available borough wide, grants have been targeted at empty properties in priority intervention areas where vacancy levels are significantly above the borough average. Two of the four proposed selective licensing areas have previously been targeted as priority intervention areas under the Government's Empty Property Cluster Programme specifically aimed at areas with clusters of long term empty properties. This has attracted empty property grant funding and other funding to bring properties back into use in these areas. Other tools used by the Council in its strategic approach to tackling empty properties include:

- Property owners are currently offered the opportunity to lease their property to a Registered Provider or Private Managing Agent who will refurbish the property before letting it and managing the tenancy.
- Owners can also sell their property to a Registered Provider or private developer through the Developers list who will then refurbish the property for sale or let.
- Should vacant property owners not wish to take up an offer of assistance from the Council to return the property to use then enforcement action has been successfully employed across a range of legislation to achieve the ultimate objective of occupying the dwelling.
- The Council have also acquired and refurbished long term vacant properties for sale to first time buyers/owner occupiers through the Home Ownership using Sustainable Empty Dwellings (HOUSED) initiative.

### ***Homelessness***

An unregulated private rented market often means an unsupported environment for the most vulnerable in society. In order to tackle some of the key problems associated with vulnerable people entering and remaining in the private housing sector the Council's Supported Housing and Homelessness Division offers a range of interventions including:

- A private rented access Scheme (PRAS) which is available to potential tenants who are vulnerable and are looking for homes in Wirral. The Scheme

provides a written bond guarantee for landlords in place of the deposit and uses additional financial initiatives such as Housing Benefit Discretionary Housing Payments to secure homes in the private sector. This scheme assists the more vulnerable households in the Borough especially those unable to raise the necessary deposit or meet their rent and helps to prevent homelessness. All tenants accommodated through PRAS are allocated a Support Worker to enable them to maintain their new accommodation. Within the last two years 221 individuals have secured homes in the private rented sector across the borough as a result of the assistance of the PRAS.

- A range of floating support services that support vulnerable people with complex needs including mental health, substance misuse and offending behaviour to remain in their own homes.

The private-rented sector makes a significant contribution to meeting the housing needs of more vulnerable households, including homeless households that the Council has a statutory duty to assist. This is where private renting directly supports the Council's Homeless Strategy. The Council works in partnership with a number of private landlords, and would like to see this service expand. Selective Licensing will ensure that the private rented sector is delivering better management standards which will enable an increased emphasis on homeless preventions linked to tenancy breakdown and will also increase the number of landlords working with the Council with well-managed, good quality accommodation

### ***Healthy Homes***

Wirral's Healthy Homes Scheme has been in operation since 2010 when it was piloted in a targeted intervention area that was experiencing high levels of empty properties, privately rented properties and multiple deprivation, including being one of the worst areas in the borough for health deprivation. The scheme employs a multi-agency approach co-ordinating services across a range of agencies and initially used council officers from a range of services including police, fire service and other agencies to undertake a door knocking approach in an effort to contact every household within the boundary area. Sub-standard privately rented properties were then brought up to standard and other services offered to provide a range of support and assistance aimed at tackling the wider determinants of poor health which included poor housing conditions.

To date the Council have completed a total of **1,403** Healthy Homes surveys and visits and made **1,941** referrals to partners. We have also completed **614** surveys under the Safe and Warm campaign which began in the winter of 2012. Referrals from health professionals including GPs ensures that Council resources are focussed on assisting those most vulnerable.



This approach would complement a Selective Licensing Scheme and offer a holistic service to improve the health and wellbeing of residents in addition to addressing low demand.

### ***Use of Existing Housing Act Powers***

In addition to the above schemes the Council uses existing enforcement powers under the Housing Act 2004 to improve housing conditions including the operation of a mandatory HMO Licensing Scheme and a reactive approach to complaints from tenants and partner agencies. Whilst these powers are effective at improving conditions, taking prosecutions and undertaking work in default are resource intensive processes. Landlords are also able to avoid prosecution by doing a small amount of the required works but delaying completion or evicting tenants and sometimes selling the property on to a new owner. In these cases, the Council may have to invest a significant amount of time into tracking down new owners before any enforcement action can be taken. Selective licensing will help to avoid this wasted time tracking down the person managing the property by making it a mandatory requirement for landlords to apply for a licence in proposed areas

### ***What alternative options have Wirral Council considered?***

All of the above initiatives have contributed to improving standards and management practices in the private rented sector and it is proposed that these services will still be used to complement Selective Licensing.

However with the rapid growth in the sector since 2001 and following changes over recent years Council enforcement activity generally has been driven by tenant or partner agency complaints to tackle poor landlords. This coupled with the fact that many tenants of poor landlords feel vulnerable to eviction, 837 of private rented tenants registered on Wirral's Housing Register said they were living in disrepair, but only 185 had complained to the Council, has steered the Council to consider the introduction of selective licensing in the worst areas suffering from low demand to ensure those neighbourhoods don't decline further.

A co-ordinated Selective Licensing approach where landlords must register, meet conditions, and where the ultimate sanction is that the responsibility of managing a property can be removed from them with a management order, represents a much clearer and stronger sanction. Wirral feels that this approach is now justified and necessary in some neighbourhoods in order to prevent these areas from spiralling into further decline. This approach will also help to empower residents and the wider community to come forward and report poor practice, knowing that there are robust sanctions in place.

A Borough wide Selective Licensing approach was considered but Wirral does not consider that the whole of the borough is experiencing low demand. Wirral

has very distinct housing markets which are clearly concentrated in small pockets in the east of the borough as evidenced in various research studies conducted in Wirral and the Merseyside Sub region into low demand. Although the former Housing Market Renewal programme has not operated since 2011 recent evidence from the Performance and Public Health Intelligence Report July 2014 still supports the fact that there is significant polarisation of the housing markets in different parts of the borough. The Council therefore needs to focus resources in the areas displaying the worst problems of low demand.

## **7.0 What is Selective Licensing?**

### ***Legal Provisions***

Selective licensing is a regulatory tool provided by the Housing Act 2004. Part 3 Section 80 of the Act allows local housing authorities to designate areas suffering from either significant and persistent antisocial behaviour and/or low housing demand. A designation can only be in force for a maximum of 5 years. By making the designation, all privately rented accommodation in the designated area not fitting into the definition of a Mandatory Licensable House in Multiple Occupation (HMO) will require a selective licence.

Owners of rented properties will be required to make an application to the Council for a licence and will need to nominate either the manager or the owner to be the licence holder. Landlords will require a licence for any properties they rent out within the designated area.

### ***License Conditions***

The licence is valid for up to 5 years and will contain a series of conditions that the licence holder will be required to comply with. These conditions will include items relating to the management of the property, fire safety and anti-social behaviour. There will also be a requirement that landlords provide references for tenants that move on from their properties. The Selective Licensing Team will be responsible for ensuring compliance with the designation. Wirral's draft Selective Licensing Conditions are attached in Appendix 4.

### ***Fit & Proper Persons***

In addition to ensuring compliance with the license conditions, Wirral Council will need to determine the proposed licence holder as a 'fit and proper' person in terms of their suitability to manage their properties before issuing a licence. In deciding for the purposes of section 88(3)(a) or (c) whether a person is a fit and proper person to be the licence holder or the manager of the house, the local housing authority must have regard to:

(a) Any offences involving fraud or other dishonesty, or violence or drugs, or any offence listed in Schedule 3 to the Sexual Offences Act 2003.

(b) Any unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in, or in connection with the carrying on of any business.

(c) Any contravention of any provision of the law relating to housing or of landlord and tenant law.

(d) Any person involved in the management of the property has sufficient level of competence to be so involved.

(e) Any person involved in the management of the house is a fit and proper person to be so involved.

### ***Enforcement of Licensing Requirement***

Where a breach of licence conditions is identified, for example misleading information on a licensing application form, the licence holder may be prosecuted with a fine of up to £5,000 per breach. Failing to apply for a licence, when a property is being let, could lead to prosecution and a fine of up to £20,000.

In addition to the above fines, Local authorities and tenants can claim back up to 12 months benefits/rents paid during the period a property has not been licensed. Ultimately landlords who continuously fail to licence a property can have control of their property taken away from them through a Management Order.

During the course of the designation the Housing Standards Team will be carrying out a programme of pro-active inspections and will take a firm approach where un-licensed properties or breaches of conditions are found, meaning that landlords in these circumstances are likely to be prosecuted. These enforcement activities will not be met from the revenue from fees and will be funded through Council investment into the Selective Licensing Team.

## **8.0 The Proposal**

### Description of proposal

The designation will be used to improve the area by raising the standard of property management of privately rented properties, improve property conditions through pro-active inspections and help to reduce the number of empty properties in the area by giving residents and local businesses confidence that the Council is focusing on improving the area through a range of complementary activities and investment.

Every privately rented flat, house or room (unless already licensed as a HMO under the existing mandatory scheme or classed as a business let such as tied accommodation) will require a licence to operate in the area and landlords will be responsible for making an application to the Council for a selective licence.

Initially it is expected that compliant landlords will apply for the relevant licence shortly after the designation, however it will be necessary to introduce a comprehensive enforcement programme to capture un-licensed properties. Enforcement will be carried out on a phased approach in order to effectively coordinate the tackling of identified problems.

### ***Licensing Fees***

The Council has identified funding to meet some of the costs involved in running the scheme however the legislation allows the Council to recover certain other costs by charging fees.

Wirral's fees will be based on the actual costs of administering a scheme in four small areas of the borough. Wirral will have regard to the fees set or proposed by other local authorities operating Selective Licensing Schemes in the region.

It is also proposed to offer the following discounts on license fees: -

- Applications made during the first 3 months of the scheme for each property
- Landlords whose properties have been accredited under Wirral's Property Accreditation Scheme
- Landlords with multiple properties

The following charges are also proposed: -

- Incomplete applications
- Finders fee (where landlords failing to licence have to be identified through additional surveys or other means).

If any details of a licence need changing then the landlord or managing agent has to apply for a variation of the licence; for example if the number of units of accommodation within a property changes, or the managing agent changes. In this instance a separate fee will be charged to vary the license.

Where the property is sold the licence is not transferable and the new owner will need to apply for a new licence. If the designation is agreed in Summer 2015, the designation will become operative in Autumn 2015. The scheme will be publicised within the designated area to maximise awareness of it.

Licenses will be applicable for 5 years unless enforcement action against the landlord has been taken within the previous two years due to poor property management practices. In this case an initial 1 year license will be issued which will be reviewed annually but can be upgraded to a full licence on meeting all the licensing conditions.

The final fee will be determined as part of the consultation process and detailed discussions with the Landlord Selective Licensing Working Group.

### ***Implementation Timetable***

November 2014	In principle approval by Wirral's Cabinet to undertake public consultation within 4 areas of the borough.
December 2014	Formal consultation begins for 10 weeks
Feb/ March 2015	Analyse consultation results & feedback
April – May 2015	Finalise scheme to take account of consultation feedback
June 2015	Preparation of report to summarise consultation findings
June 2015	Report to Cabinet for final consideration of scheme
July 2015	Notice of proposed designation to run for 3 months
October 2015	Declaration of Scheme and commencement of licensing applications
January - 2016	Commencement of Licensing scheme (three months after designation as required by the Housing Act 2004)

## **9.0 Benefits of Selective Licensing**

### ***Summary of benefits***

Selective Licensing provides the Council with the powers to regulate the private rented sector. For it to succeed in its goals of improving demand for an area and make an impact on the area as a whole, it is important that the Council supports landlords and disseminates good practice in order to achieve the best possible outcomes.

It is expected that introducing these schemes into the four selected areas will have a number of benefits to the community, landlords, tenants and owners, both directly and indirectly.

The defined aim of the scheme and a key outcome for the project is to take measures that will lead to an improvement in management and property conditions in the area during the 5 year period of the proposed designation. A benefit for landlord's, tenants and the wider community will be a dedicated point of contact within the Council's Selective Licensing Team for complaints, advice and support.

Other expected benefits include:

#### Benefits for landlords

- Improved communications with Council services
- Better understanding from landlords and managing agents of their statutory responsibilities through training and briefing sessions
- Improved reputation of private landlords
- Access to the Council's Property Accreditation Scheme and associated benefits
- Improved confidence in the market and potential growth in property values in the area
- A level playing field where all landlords in the proposed area will be required to operate to the same standard.

#### Benefits for tenants

- Better understanding from tenants about the minimum standards of property condition and management standards that they should expect
- Education for tenants in their responsibilities to behave in a tenant like manner
- Written tenancy agreements, inventories and protected deposits
- Encouragement of landlords not to take tenants with a poor reference
- Shorter void periods and less tenant turnover

#### Benefits for the community

- Improvement of the image and desirability of the area
- Fewer empty properties and associated benefits which could include reduced Anti-Social Behaviour and blight.
- An increase in the length of tenancies in the area leading to more settled communities
- Increased tenant awareness of their responsibilities to behave and act within the terms of their tenancy agreements

## **10.00 Risk Analysis**

### ***Displacement***

There is a risk that with the introduction of Selective Licensing, landlords who are keen to avoid bringing their properties up to the minimum statutory standard and

adhering to the mandatory conditions will decide to sell their properties, leave their properties empty, or decide to move elsewhere. The Council has tried to reduce the likelihood of this by declaring the initial areas as 'pilot areas' on the understanding that if successful and funding is available in the future, Selective Licensing could be extended to additional low demand neighbourhoods. The Council will also ensure that in areas where there is the potential for displacement to occur, we will raise awareness with tenants and service providers of landlord's statutory responsibilities which can still be enforced even if these areas haven't been declared as selective licensing areas.

Where landlords decide to leave their properties empty, to avoid paying a license fee and complying with management conditions, the Council's empty property strategy will ensure all long term empty properties are actively targeted for intervention and brought back into use which is the current practice for priority areas with high volumes of empty properties.

The Council will take enforcement action on all long term vacant properties that are in disrepair and causing blight in the community. Landlords with properties which have been vacant for more than 2 years will also have to pay a Council Tax Premium of 150% of the standard rate.

The Council does however want to work positively with landlords in Selective Licensing Areas and subject to resources being available, will make Empty Property Grants available to landlords to help towards the improvement costs associated with bringing their long term empty properties (vacant 6 months or more) up to the required standard. It is intended that there will be a cut off for applications for the empty property grant after 6 months of the Selective Licensing areas being declared, unless extenuating circumstances are evidenced. The Council will also try to assist in finding suitable tenants for empty properties via its Housing Options Service.

The risk of displacement in Wirral with the controls outlined above are therefore considered to be relatively low, especially as Selective Licensing Areas are already experiencing low demand making it less advantageous for landlords to sell properties quickly in these areas for a reasonable return. The Selective Licensing Team will play a key role in convincing landlords of the economic benefits of investing in their properties, renting them out responsibly and retaining them for the long term to generate an income that over time will offset the Selective Licensing Fees as well as generating confidence and greater stability in the area, creating the right conditions for the housing market in these areas to grow.

Furthermore, there is little evidence from other similar Local Authorities with Selective Licensing Schemes that displacement has occurred. Blackburn with Darwin, a similar size Council to Wirral reported that there has been no evidence

of displacement of either tenants or landlords and there is some anecdotal evidence that due to the Council's ongoing commitment to landlords, they can now let properties in the licensing areas that had previously been difficult to let. Burnley, which also had a Selective Licensing area on a similar scale to those proposed by Wirral, also reported no evidence of displacement but an improvement of management standards within the Selective Licensing area.

Selective Licensing in Leeds 'has forced a minority of landlords to 'sell their properties and leave the area' The Council also said there was less churn in the area, with evidence of less anti-social behavior: complaints about fly-tipping and graffiti had fallen. Newcastle also reported that a number of landlords had sold their properties, and that 'more reliable' landlords were now carrying out refurbishment works.

### ***Risk Register***

Other risks have been summarised in the Risk Register in Appendix 5 showing the current and proposed controls that would be implemented subject to the scheme getting approval to proceed. The risks would be managed through the Council's existing performance management framework.

## **11.00 How will we consult?**

There will be a formal consultation process on Wirral's proposed selective Licensing Proposals which will last for a period of 10 weeks which will commence subject to Cabinet Approval in November 2014.

Further information about the consultation process and how to get involved will be set out on the Council's website and everyone who is likely to be directly affected by proposals and those immediately adjacent to the proposed areas will be contacted and invited to participate in the consultation through a variety of consultation methods as set out in the Consultation Plan in Appendix 3

You can also find further information at [www.wirral.gov.uk/selectivelicensing](http://www.wirral.gov.uk/selectivelicensing)

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Or write to:

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Draft