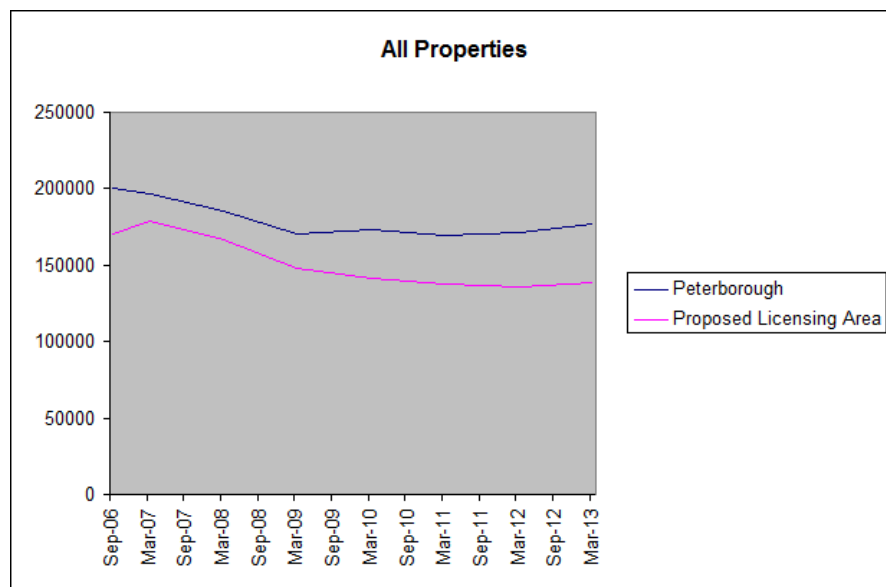


Annex A - Evidence

1. The Council proposes to introduce a Selective Licensing Scheme in the Gladstone, Millfield, New England and Eastfield areas of the City. The proposed area consists of 10933 properties. In the Gladstone, Millfield and New England area (known as the Op CanDo area) over 40% of the properties are privately rented and in the Eastfield area 33% are privately rented. The Council must satisfy a number of grounds in order to introduce Selective licensing, those being:
 - The area is, or is likely to become, an area of low demand; and
 - That making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, contribute to the improvement of the social or economic conditions in the area.
2. The Housing Act sets out a number of factors, which the Council must take into account (among other matters) when deciding if an area is, or is likely to become an area of low housing demand, as follows:
 - 2.1 The value of residential premises in the area when compared to the value of similar premises in other areas, which, the Council considers to be similar.

The value of properties in the proposed selective licensing area is lower than the value of property in the City as a whole. This is particularly so for terraced properties with nearly £30,000 difference between the proposed area and the average for a terraced elsewhere in the City.

The following charts represent the sale prices of properties over the last 7 years for the proposed selective licensing area compared to the rest of the City as a whole.



- 2.2 The turnover of occupiers of residential premises i.e. how often people move house and, the number of residential premises, which are available, to rent or buy and the length of time for which properties remain unoccupied within the area.

Between October 2012 and March 2013 the Council conducted house to house surveys across the proposed area to gather data and residents views, 3,045 households told us how long they had lived in their property. Between 2007 and 2013 there are many more people moving into the area who are privately renting their properties:

Year	Private Rented	Owner Occupied
2012 – 2013	364	3
2007 - 2011	624	225

Prior to 2007 the opposite trend was occurring and owner occupiers were predominantly moving into the area:

Year	Private Rented	Owner Occupied
2000 – 2006	116	397
1991 – 1999	18	338
1981 - 1990	3	130
1971 – 1980	1	77
1961 – 1970	1	30
1951 – 1960	0	9

The remainder of the residents were either housing association tenants or had lived in their properties prior to 1950. The table shows a significant shift away from owner occupation and towards privately rented properties within the area. Thus creating unbalanced communities.

Looking specifically at the private rented sector occupants to establish how long the tenants were staying in their homes, this table shows at the time the housing survey was conducted how long the private rented tenants had been in their homes.

Length in occupation	Number of households
0-6 months	33
6-12 months	331
1-2 years	190
2 – 3 years	202
3-5 years	195
Over 5 years	109

When there is a high turnover of occupants within an area it is difficult to build strong and supportive communities and people are more likely to have less pride and interest in their neighbourhoods.

2.3 Additional factors which the Council should also consider when deciding if an area is suffering from, or is likely to become, an area of low housing demand are:

- A lack of mixed communities in terms of tenure, for example, a high proportion of rented property, low proportion of owner occupied properties.
- A lack of local facilities, i.e. shops closing down
- The impact of the rented sector in the local community, for example poor property conditions, anti social behaviour, etc
- Criminal activity

2.3.1 The rapid influx of privately rented properties has no doubt brought with it an increase in the number of private rented sector landlords. However it is difficult to quantify the number of individual landlords who are responsible for these rented properties, let alone their professionalism and business conduct. Evidence can be gained by assessing the volume of formal complaints made which originate from within the proposed area over a four-year period.

Year (April to April)	Number of Complaints	% of total number received across the whole city
2009 – 2010	436	48%
2010 – 2011	495	56%
2011 – 2012	347	55%
2012 – 2013	544	60%

Requests for action against private landlords in 2012–13 were received at a rate of 1 complaint for every 26 houses in the proposed area. In comparison there was 1 complaint for every 163 houses across the rest of the city.

2.3.2 Two of the legal requirements for renting out property in the private rented sector are that the property must have an annual gas safety check and that if the property has been let since 2008 the landlord must have an energy performance certificate commissioned. Both of these documents should be provided to the tenant so they can ensure that the gas appliances in their property are safe and have an understanding of the energy efficiency and fuel costs associated with the house. From the Op Can Do housing survey of the 854 (62.3%) tenants who knew whether the gas had been tested 532 had seen a current gas safety certificate but 322 (37.7%) had not. Upon examining the Energy Performance Certificate national register it is established that only 33% of the privately rented houses in the proposed area have an EPC recorded whereas 62% do not.

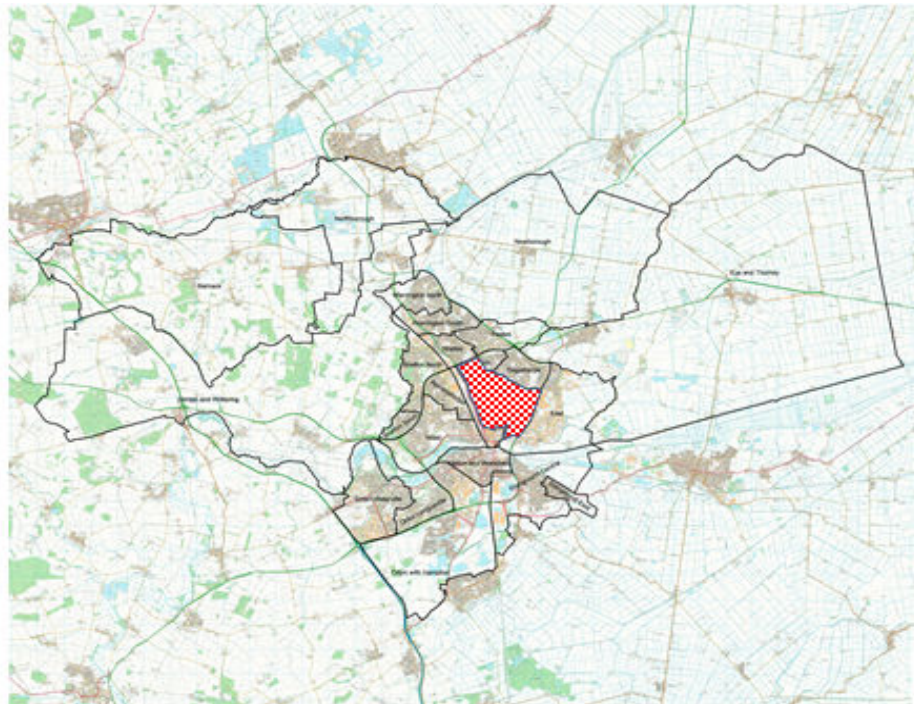
2.3.3 Many landlords will utilise established and reputable letting agents, others are individuals who self manage one or more properties and are more likely to be inexperienced individuals who have acquired properties as speculative investment opportunities to provide supplementary income and who do not take all relevant and legal considerations into account, or have the skill or knowledge to comply with all the relevant and legal considerations that come with renting properties and providing much needed homes within the area.

2.3.4 A snap analysis of the complaints received by the housing enforcement team in 2013 was undertaken to establish whether tenants had rented their properties via a letting/managing agent or directly with the landlord.

Rented via letting/managing agent	23%
Rented direct from landlord	43%

2.3.5 Activity reported from the housing enforcement team indicates that there continues to be a high demand for houses in multiple occupation (HMO) within the proposed area, which is reflected in the number of reported HMOs, these properties are often found to be overcrowded. Although statistically the numbers of complaints have dropped from the previous year, evidence indicates that overcrowding is a serious issue not only in HMO accommodation but also in single dwellings.

- 2.3.6 The city of Peterborough has 183,631 residents and 74,023 households according to the Census 2011. The proposed selective licensing area comprises Gladstone, Millfield and New England which has 28,263 residents and 10,016 households in total and Eastfield with 11,021 residents and 4,506 households.
- 2.3.7 The proposed licensing area comprises 19.6% of the city's households and 21.4% of the city's residents, whereas the rest of the city comprises 80.4% of the city's properties but housing only 78.6% of the city's population. These figures combined with the high percentage of empty properties in the area compared to the rest of the city shows clear overcrowding in the proposed area.



- 2.3.8 The significant population growth of new arrivals from Eastern Europe within the proposed area has allowed landlords to charge high rents for small properties. Families are predominantly earning low incomes, which has led to many families choosing to share their housing and split the rents, which in turn has led to overcrowding. The area is predominantly made up of Victorian and brick built terrace housing which is unsuitable for needs of multiple or large extended families.

According to the Indices of Multiple Deprivation 2010 (the latest available) the best fit wards for the proposed area feature some of the highest (worst) scores regarding overall deprivation in Peterborough. Central was determined to be the most deprived in Peterborough, North was fourth, East was sixth and Park was twelfth (due to the presence of older, luxury houses and comparatively large amounts of greenspace).

2.3.9 There are currently 306 long term empty properties in Peterborough. Of this 85 are in the proposed licensing area, which is 28% of the total across the City. This is a proportionally high number, which provides further evidence of an area in decline.

Empty homes are often magnets for ASB, arson, squatting and have a knock on affect to surrounding properties, lowering values and generally making the area a less desirable place to live. They can be a visual reminder of the need for social, economic and environmental regeneration of an area.

Of the 85 long term empty properties 16 (19%) are currently going through probate, 6 (7%) are unoccupied due to fire, police action, or repossession, 13 (15%) are undergoing refurbishment works and 6 (7%) are for sale or part way through a sale process. The remainder are being addressed through Councils Empty Homes Strategy.

2.3.10 Anti-social behaviour (ASB) has been a concern and a priority within a significant portion of the proposed selective licensing area for a number of years. This was deemed important enough that a dedicated, multi-agency approach to tackle deeply entrenched issues across a multitude of crime and ASB issues was established in March 2011 - 'Operation CanDo'.

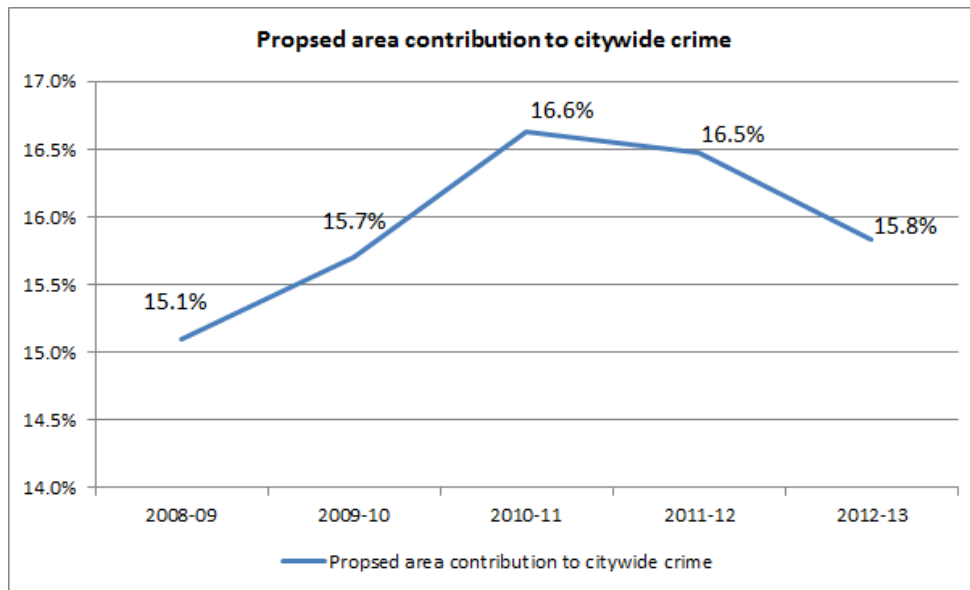
Since its launch dedicated resources from many areas such as police, neighbourhood enforcement, fire, and young people's services have worked together to improve the area. Following two years of intensive resourcing, Cambridgeshire Constabulary have a dedicated team of 9 permanent officers for the area.

There has been a demonstrable fall in the number of reported cases and calls for action, though it remains one of the biggest challenges in the City if future aspirations for the area are to be realised.

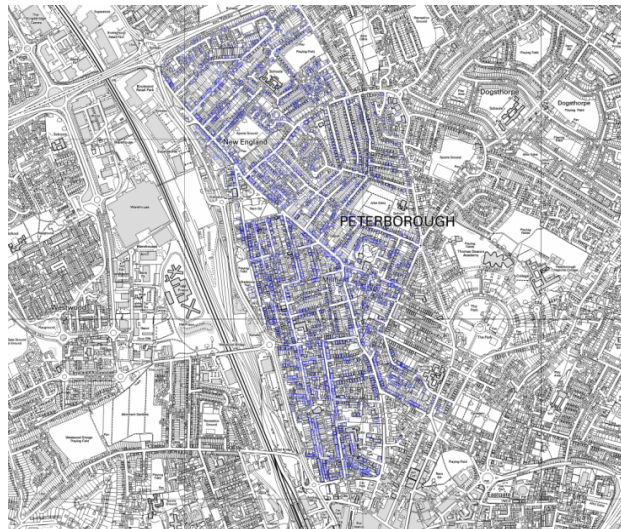
2.3.11 Crime within the proposed area has seen year on year reductions although at a considerably slower rate than the city as a whole. Peterborough as a whole recorded a reduction in crime of 22.8% between the financial years 2008/9 to 2011/2, compared with only 13.9% reduction in the proposed area. When 2012-13 data is utilised, there is an observed reduction from 2008-09 of 22.8% across the city and 25% within the proposed area.

The table below shows the number of recorded crimes for the proposed area as well as the city as a whole.

	Op Can Do area	Citywide Count
2008 – 2009	2238	22169
2009 – 2010	2155	20966
2010 – 2011	2052	18822
2011 – 2012	1926	17114
2012 - 2013	3,852	15,958



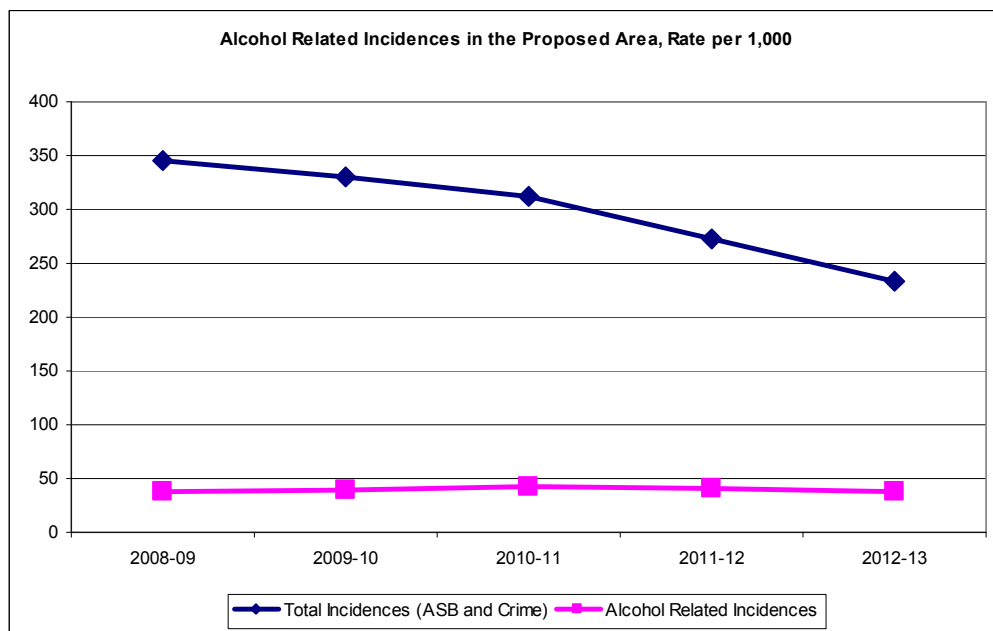
2.3.12 Between the financial years 2008/9 and 2011/2 Peterborough as a whole recorded an overall reduction in reported ASB of 35.4% with a total of 6,663 reports whereas the proposed area's reduction for the same period was 27.3%, a total of 631 reports. The reduction is related to the inception and continued development of Op CanDo. However, whilst these figures confirm the number of ASB incidents is declining across both areas they are at different rates, accordingly the proposed area's proportional contribution towards city wide ASB is increasing. The most recent year of 2012-13 shows that there has been a reduction of 46% across the city as a whole and 42% in the proposed area.



2.3.13 ASB is not limited to specific hotspots within the proposed area, it is distributed throughout the whole area and is potentially having a detrimental effect on all residents and businesses within the proposed area.

Recorded alcohol related incidents within the best fit wards for the proposed area demonstrate year on year increases as shown in the table and chart below. Incidents of alcohol related ASB are increased by 7.4% in the proposed area between from 2008/9 and 2011/2, whilst the city overall recorded a reduction of 36% for the same period. Furthermore, while the total number of incidents has recorded a downward trend, the amount of incidents with an alcohol related tag has numerically and proportionally increased.

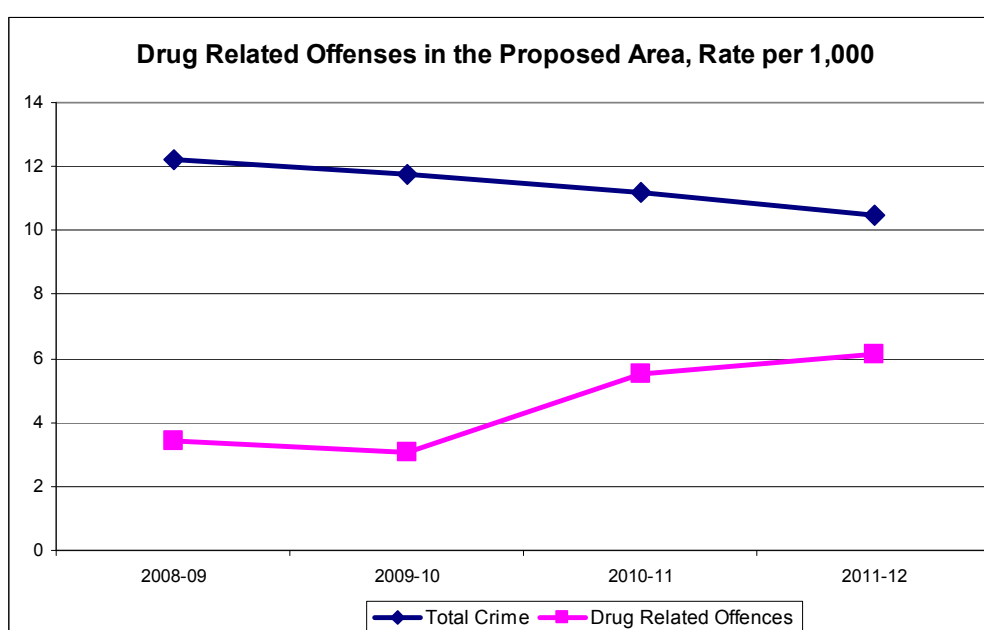
	2008 – 09	2009 – 10	2010 – 11	2011 – 12	2012 – 13
Total incidents	9,780	9,317	8,825	7,692	6,598
Alcohol tag	1,073	1,097	1,179	1,159	1,091
Percent	11.0%	11.8%	13.4%	15.1%	16.5%



(These are presented as rates per 1,000 population i.e. the numeric figure for the year divided by the population of the area recorded at the 2011 census)

An even greater increase occurred regarding drug related offences, increasing from a recorded 4% of total offences in the proposed area in 2008/9 to 9% in 2011/2, as shown in the table and chart below. However this increase in drug use offences does not follow with an increase in the number of people accessing treatment for substance misuse.

	2008 – 09	2009 – 10	2010 – 11	2011 – 12
Total offences	2238	2155	2052	1926
Drug related offences	97	86	156	173
Ratio	4%	4%	8%	9%



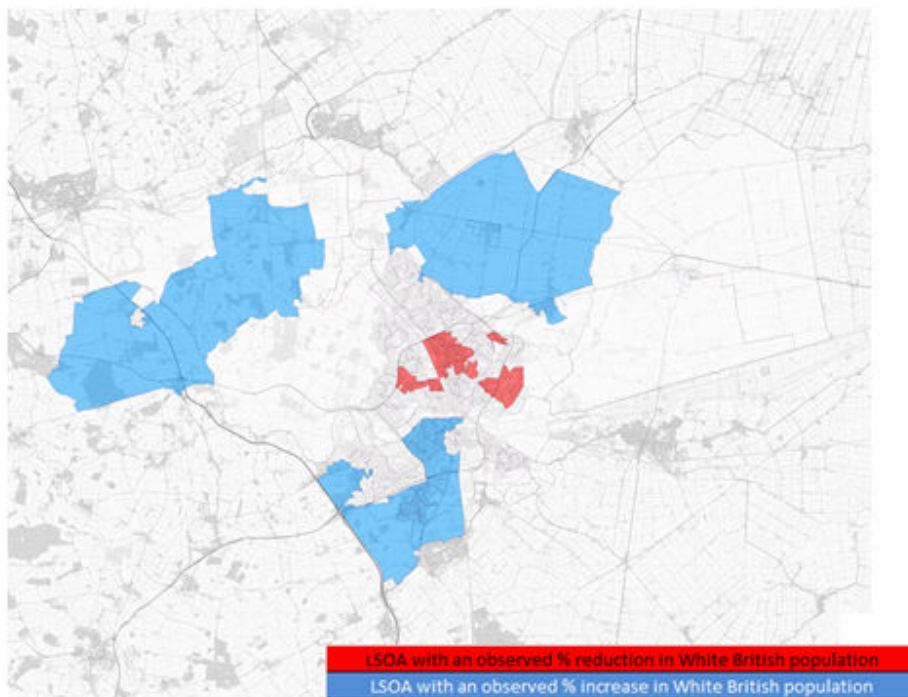
(These are presented as rates per 1,000 population i.e. the numeric figure for the year divided by the population of the area recorded at the 2011 census)

2.3.14 In addition to police recorded ASB, the Safer Peterborough Partnership also routinely monitors 19 Quality of Life indicators, which include noise complaints, flytipping and unattended bins amongst others. During the 2012/3 financial year the proposed licensing area contributed 5,157 separate calls to service from a city wide total of 20,167, over 25%.

It is important to be aware that the Crime, ASB and Quality of life figures only represent those instances that are reported to the police, local authority and partners. Therefore they do not provide a complete picture of local issues as whether an individual reports an incident is dependant on a number of factors. The proposed area is one of significant growth and a highly transient nature, with Central ward in particular experiencing a large population increase of over 37% between the 2001 and 2011 censuses. There is a clear changing demography in the area as it appears to be a first point of entry for new migrant arrivals to the city who are arguably, unlikely to be fully aware of the UK housing standards and tenancy rights and are therefore the most vulnerable to rogue landlord exploitation and poor housing conditions.

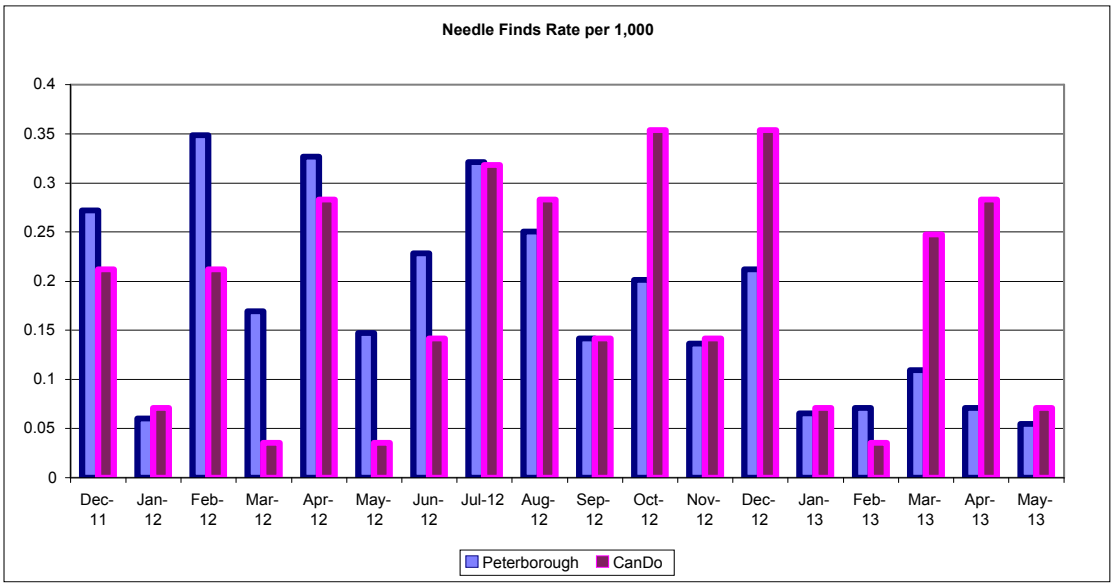
2.3.15 Between the censuses of 2001 and 2011 Peterborough recorded a total decrease in white British residents of 3,519. For recording purposes Peterborough is split into 104 areas known as lower super output areas. In 79 of those areas there was a proportional decrease in the number of white British residents and in the majority of those areas the total resident population increased, typically due to compounded increases in White Other and Asian populations. The majority of these were in urban areas.

The top ten areas that recorded a reduction in the White British population saw a comparatively high increase in other ethnicities (highlighted on the map in red). One of the areas showed a reduction of White British residents of over 71%. The areas showing a decrease in White British population but with a total overall increase are those in or immediately adjacent to the proposed selective licensing area. The areas marked on the map in blue show the top ten areas with the largest increase in White British populations and are largely rural areas of the City.



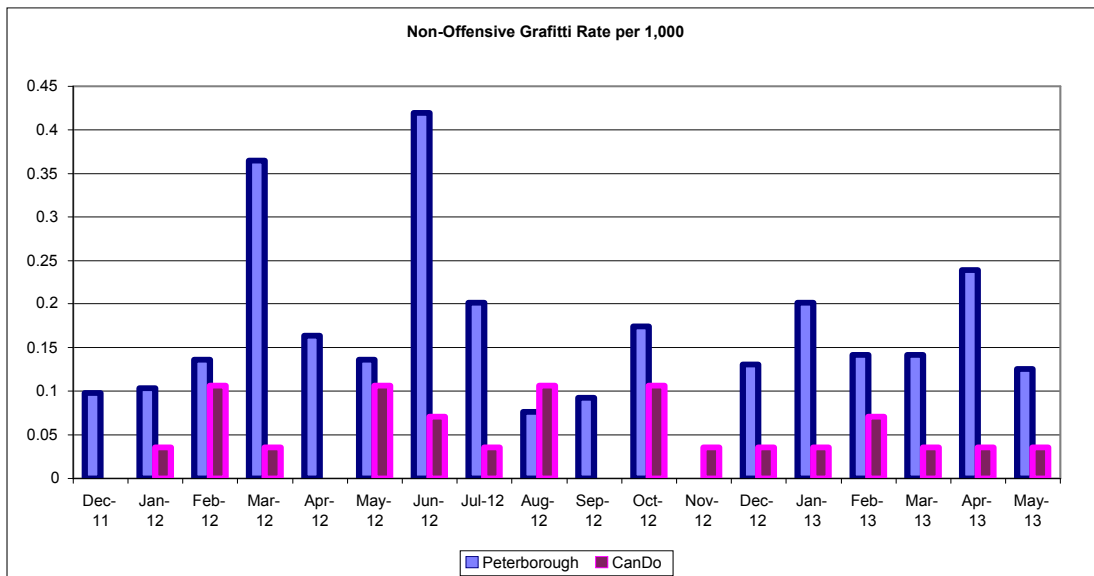
3. The Housing Act 2004 sets out a number of factors which the Council must take into account (among other matters) when deciding if an area is, or is likely to become an area of significant and persistent problem caused by anti-social behaviour:
- Crime – tenants not respecting the property in which they live and engaging in vandalism, criminal damage, burglary, robbery/theft and car crime.
 - Nuisance neighbours; intimidation and harassment, noise, rowdy and nuisance behaviour; animal related problems; vehicle related nuisance; tenants engaging in begging; anti-social drinking; street prostitution and kerb-crawling; street drugs market within the curtilage of the property.
 - Environmental crime: tenants engaged in graffiti; drugs paraphernalia; fireworks misuse in and around the curtilage of their property.
 - Some or all of the private landlords who have let premises in the area are failing to take action to combat such problems that it would be appropriate for them to take.

3.1 The following graphs show the number of needle finds each month within the Op CanDo part of the proposed licensing area compared with the rest of the City which is including Eastfield (also part of the proposed area). Finds are recorded as a spot where needles are rather than the number of needles found. The whole of the proposed licensing area is 1/5 of the size of the city's housing population with the Op Cando area representing 13.5% of the city's housing population. Yet the figures below show that most of the discarded needles came from within the proposed selective licensing area.

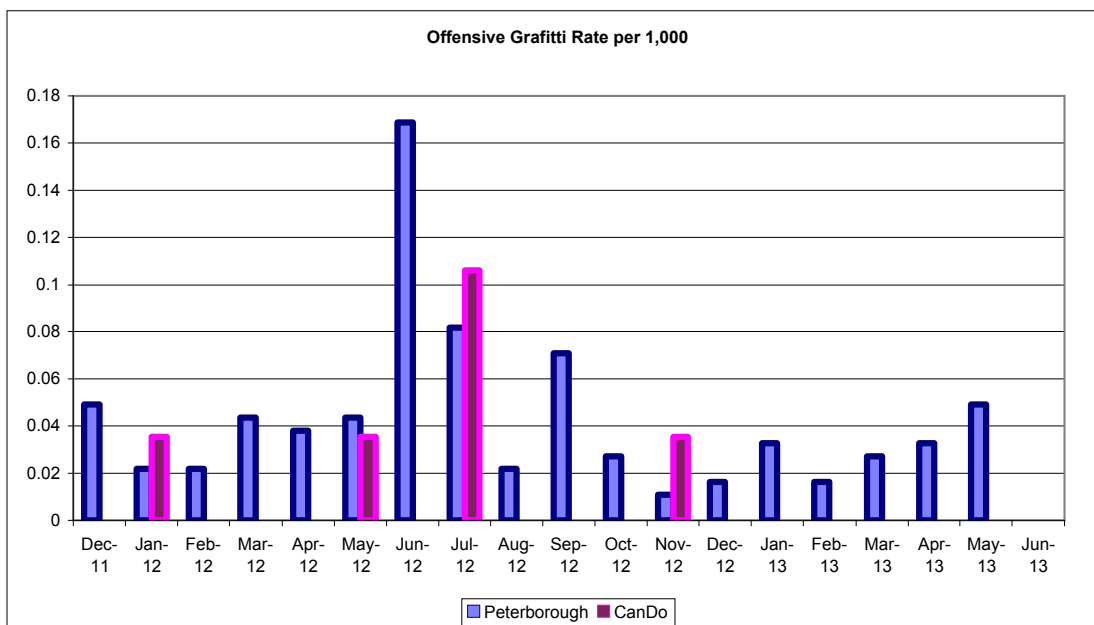


(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.2 The following graphs show the month on month changes to graffiti removal within the proposed licensing area and as a comparison to citywide graffiti removal. Residentially the size of the proposed area is 1/5th of the total residences in the city as a whole. Graffiti is therefore not deemed to be disproportionate to the rest of the city.

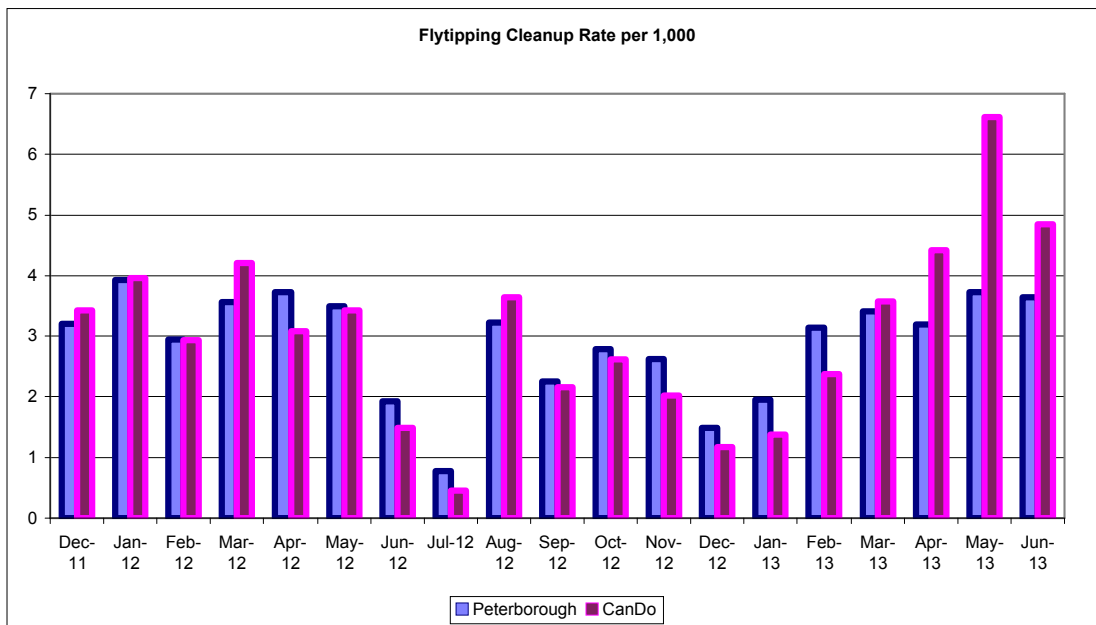


(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)



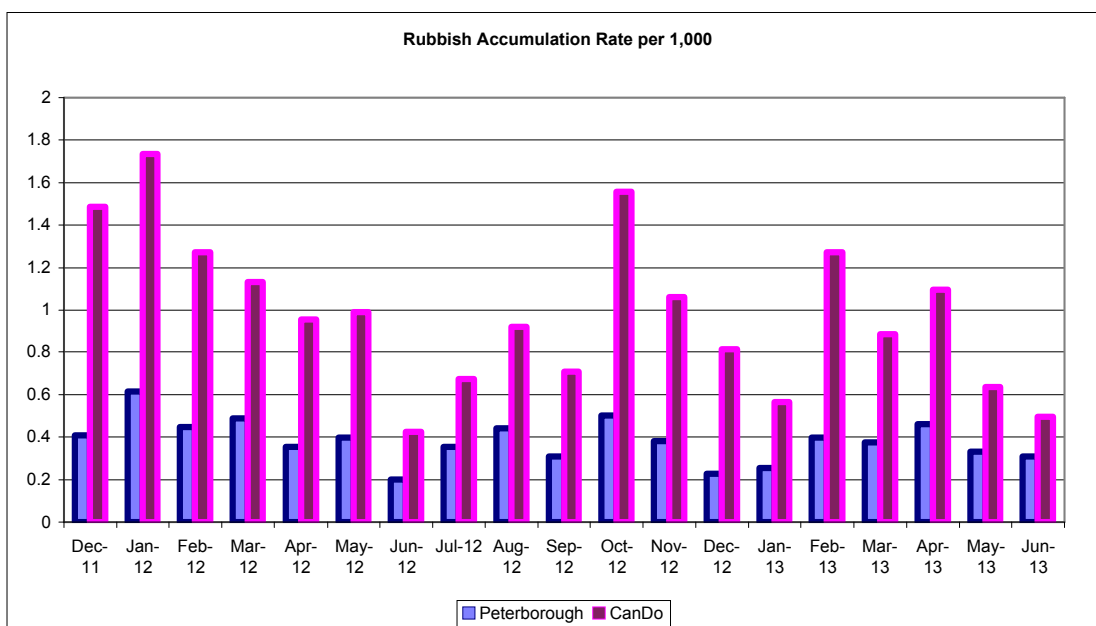
(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.3 Between December 2011 and June 2013 there were 1,634 incidents of flytipping cleared from within The Op Cando area. 10,099 were cleared for the city as a whole for the same period. The following graphs show flytipping clean up rates within the proposed area month on month in comparison to the rest of the city per 1,000 population.



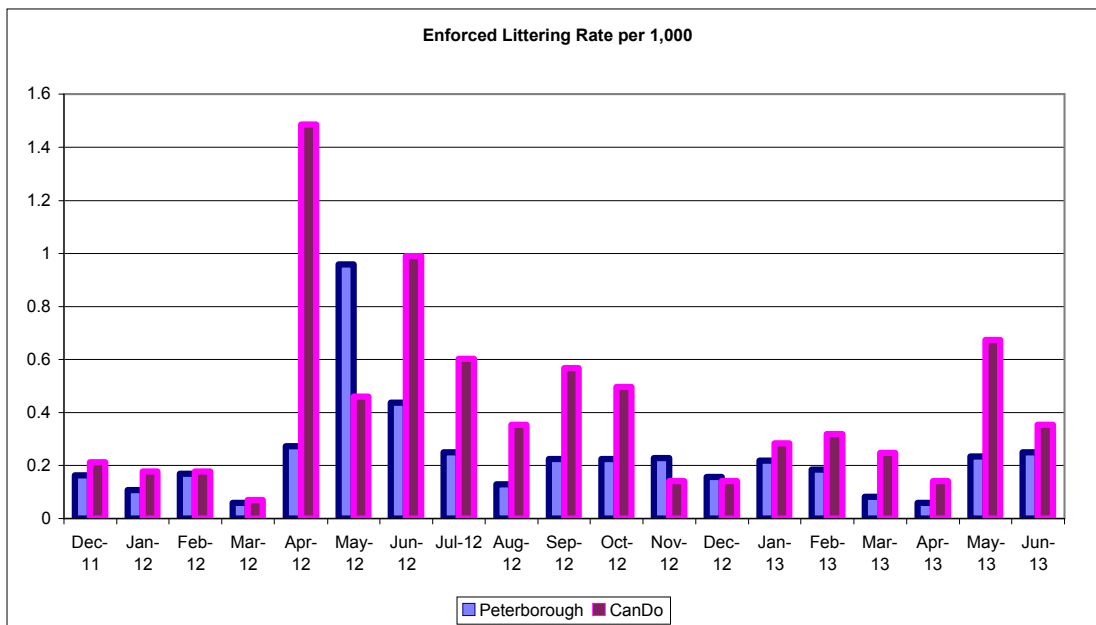
(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.4 Accumulations of rubbish which are mainly in front and back gardens of residential properties numbered 1,334 across the city between December 2011 and June 2013 with 528 accumulations being in the Op CanDo area. The chart below shows the percentage of accumulations per 1,000 population in the Op CanDo area compared to the rest of the City. The rest of the city data includes Eastfield which is part of the proposed selective licensing area. The graph clearly shows that accumulations are a huge problem within the area on a month on month basis.



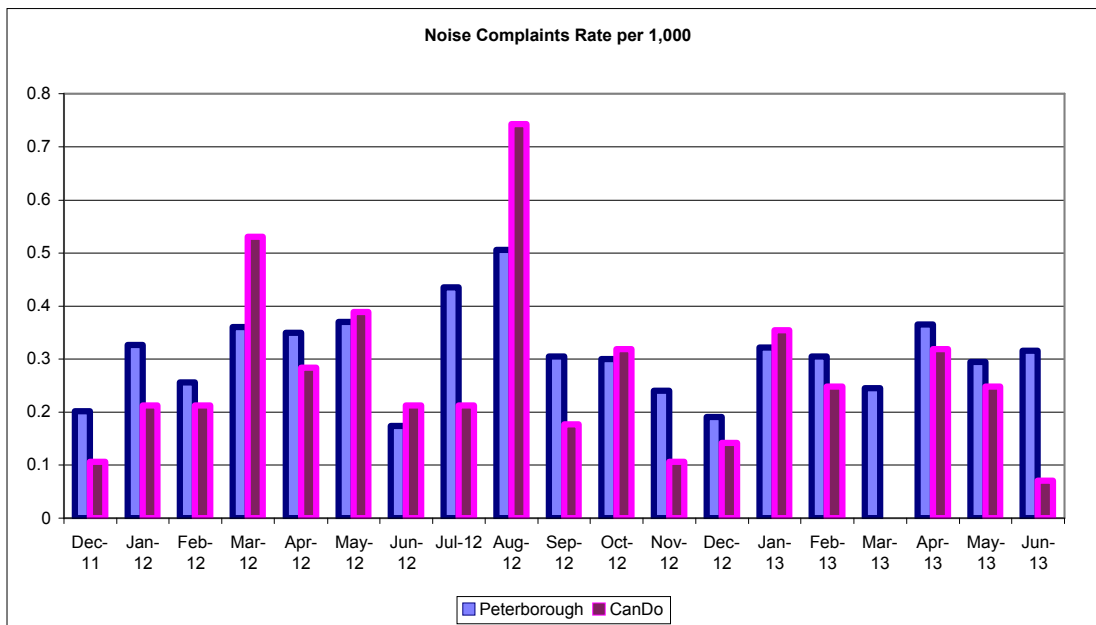
(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.5 There are 5 Neighbourhood Officers patrolling the city, the city being split into geographical areas. Two officers patrol the Op CanDo and Eastfield area of the city. In addition to dealing with accumulations and flytips the Neighbourhood Officers also issue fixed penalty tickets to people found littering in the street. In the period between December 11 and June 13 a total of 223 tickets were issued in the Op CanDo area compared with 810 throughout the city as a whole. 27.5% of all tickets were issued in the Op CanDo area. The graph below shows the proportion of tickets issued per 1,000 population compared between the Op Can Do area and the wider city area.



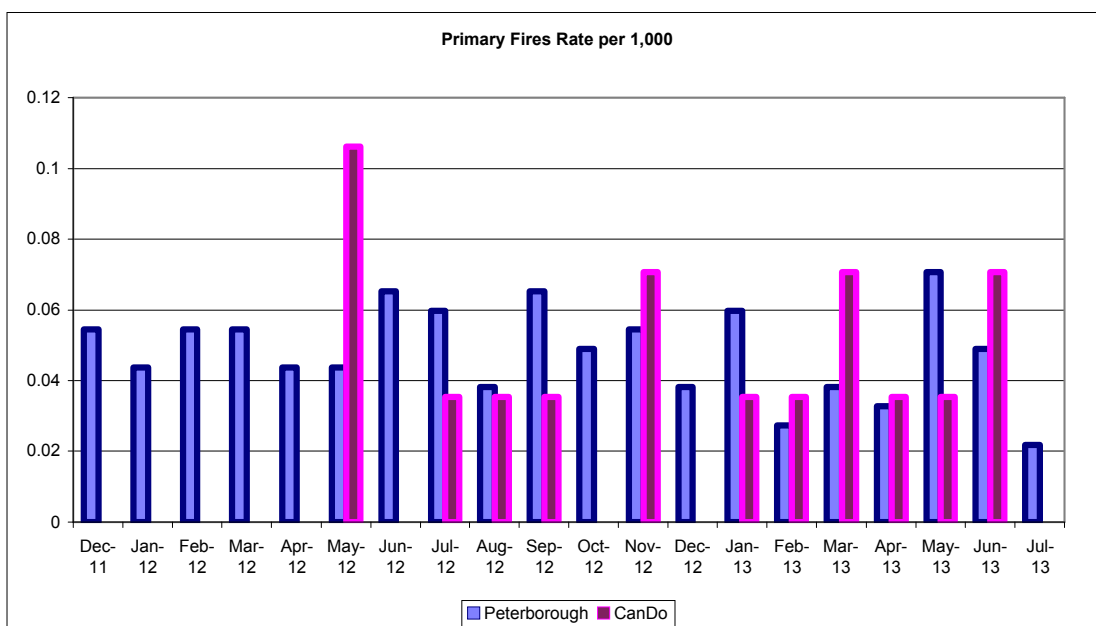
(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.6 Between December 2011 and June 2013 there were a total of 138 noise complaints from within the Op Cando area with a total of 1076 for the overall city. This equates to 12.8% of noise complaints coming from part of the proposed area. The graph below shows the percentage of complaints per 1,000 population between the Op CanDo area and the whole city. The rest of the city data includes Eastfield which is part of the proposed selective licensing area.



(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

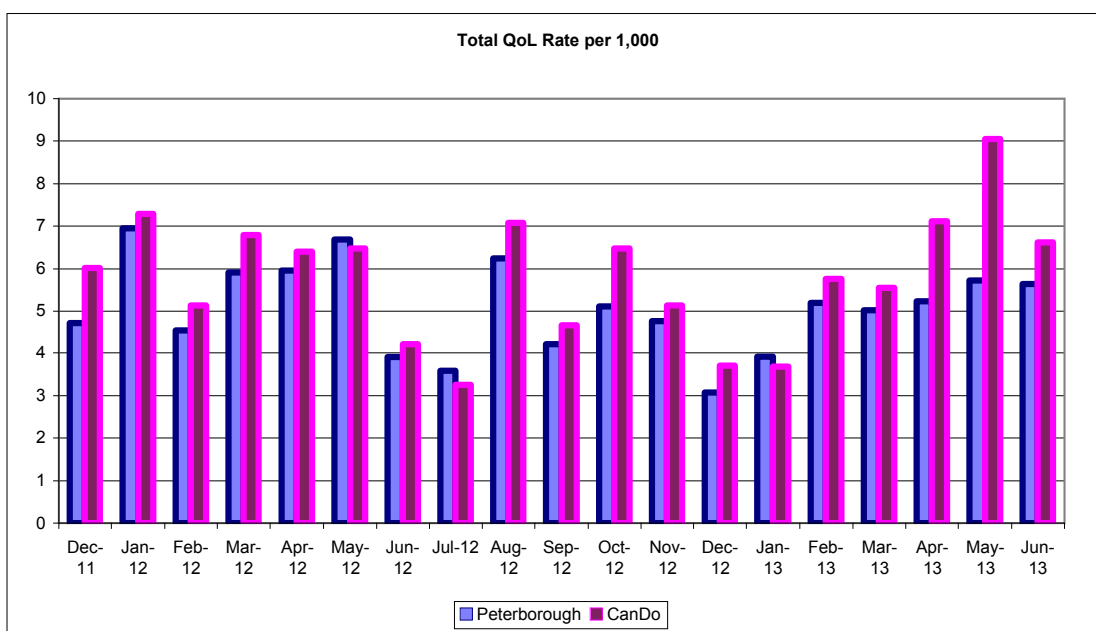
3.7 The city consists of 79,092 properties with 10,933 (13.8%) being in the proposed selective licensing area. Between December 2011 and June 2012 there were 16 primary fires within the Op CanDo area out of a city total of 173 primary fires, equating to 10.81% of the total. The graph below shows the percentage of fires per 1,000 population across the two areas over the recorded period.



(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.8 Quality of Life is a term which can be used in a wide range of contexts to evaluate the general wellbeing of individuals, communities and societies. It includes graffiti, fly-tipping, needle finds, damage to play equipment in parks and a variety of others. Data is collated and collected from both Peterborough City Council, but also various partner associations including emergency services, Enterprise Peterborough, and drug service providers.

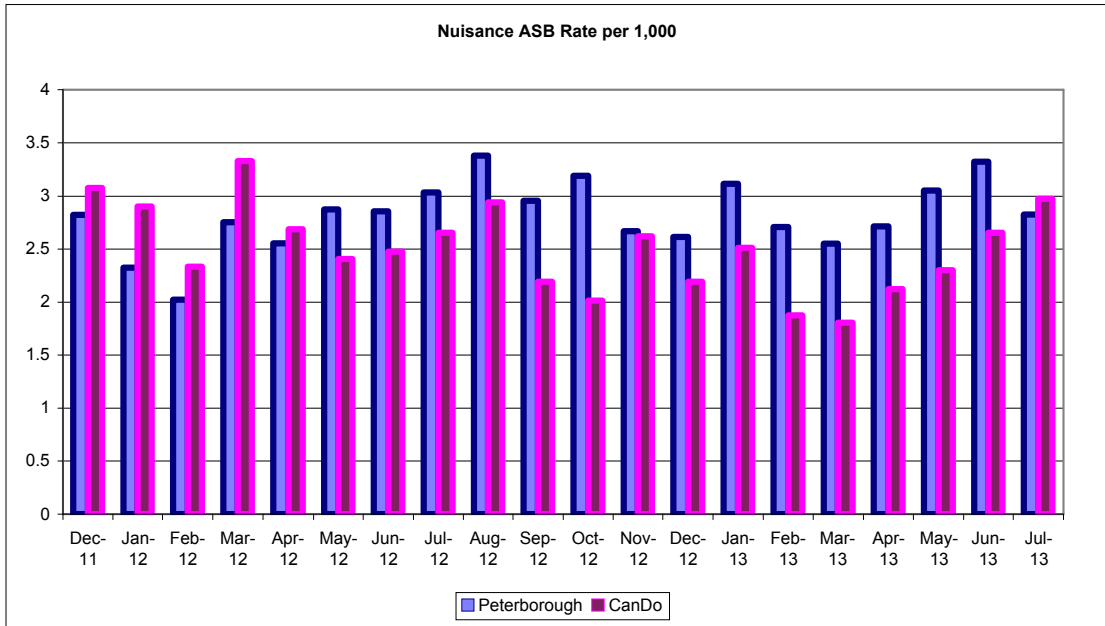
Work is continually being done by the Safer Peterborough Partnership in conjunction with the Neighbourhood Window, to improve the quality and quantity of data that is held on quality of life incidents. This has resulted in the most comprehensive directory of data from a range of agencies that has ever been held in Peterborough and will go much further than ever before to capture exactly where the issues are and investigate these appropriately.



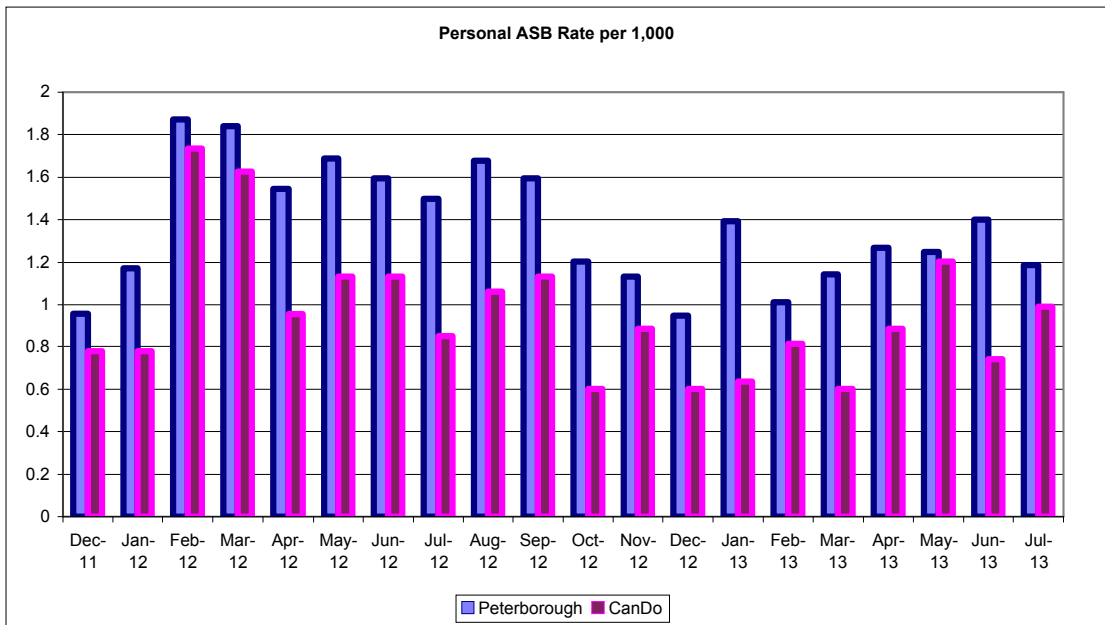
(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.9 Of the 19 indicators, there are three that have a significantly higher number of instances with a corresponding percentage of the total. These are ASB-Nuisance, ASB-Personal and Flytipping. Together these comprise 67.1% (3,458) of the Op CanDo areas issues compared to 74.4% (15,005) for Peterborough as a whole (including Eastfield).

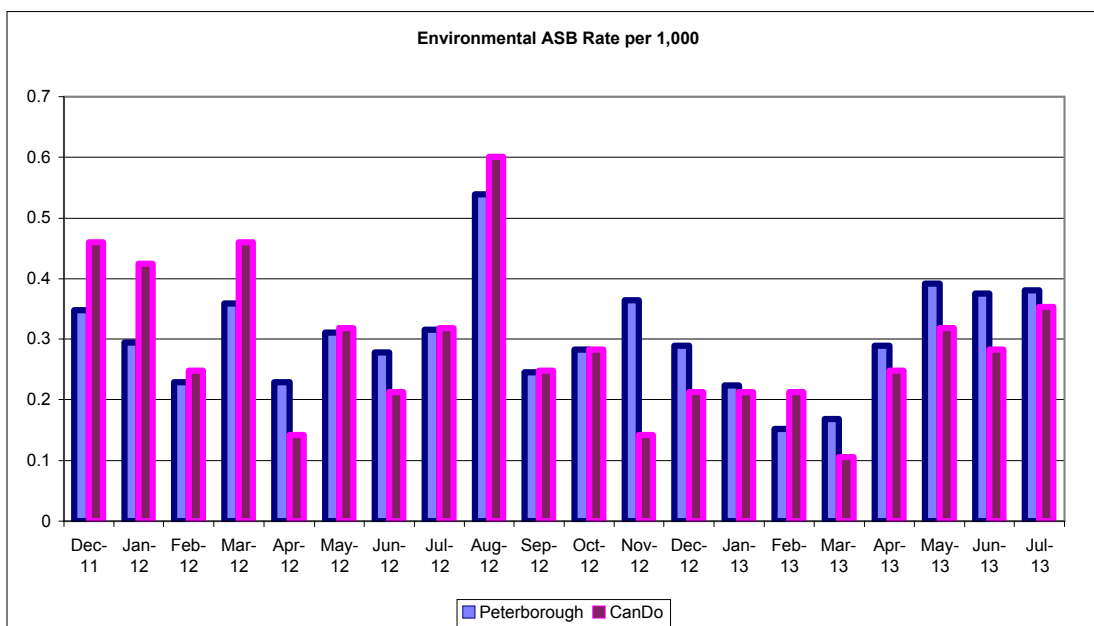
The tables below show the data for ASB-Nuisance and ASB-Personal and ASB- Environmental as a rate per 1,000 people over the Op CanDo area compared to the whole city.



(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)



(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

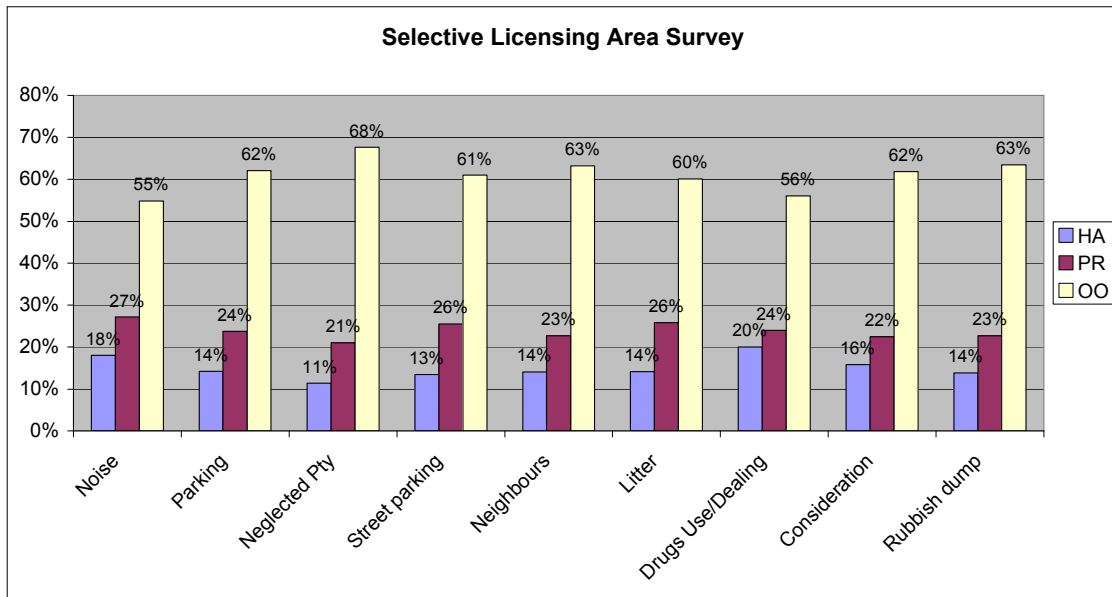


(These are presented as rates per 1,000 population i.e. the numeric figure for the month divided by the population of the area recorded at the 2011 census)

3.10 A household survey conducted by the strategic housing team highlights clear observational differences regarding the same neighbourhood between those who live in privately rented properties, social housing and owner occupiers. A total of 8392 surveys were conducted throughout the proposed selective licensing area with access gained to 3117 homes equating to 29.5% of all properties within the proposed area.

The questionnaire gave residents the opportunity to rate specifically chosen issues with a score of 1 to 5: 1 meaning that they felt the issue caused them real problems, 5 meaning that they didn't feel it was an issue at all. The issues selected were noise, parking, neglected properties, street parking, nuisance neighbours, litter drug use/dealing, consideration of others and rubbish dumping.

3.11 The following table demonstrates that residents who are living in privately rented housing did not rate the issues as highly as those living in social housing or those owning their own homes. Social housing tenants and owner occupiers have much longer term interests in their properties and neighbourhoods by virtue of longer tenancies and financial interests.



3.12 On all issues the tenants in social housing and owner occupiers thought all of the issues selected were more problematic than those living in the private rented sector. In some cases the proportion of those scoring issues as having a great impact on their lives by scoring the problems as 1 and 2 is significantly higher than the scoring by private sector tenants. This could be due to three possibilities:

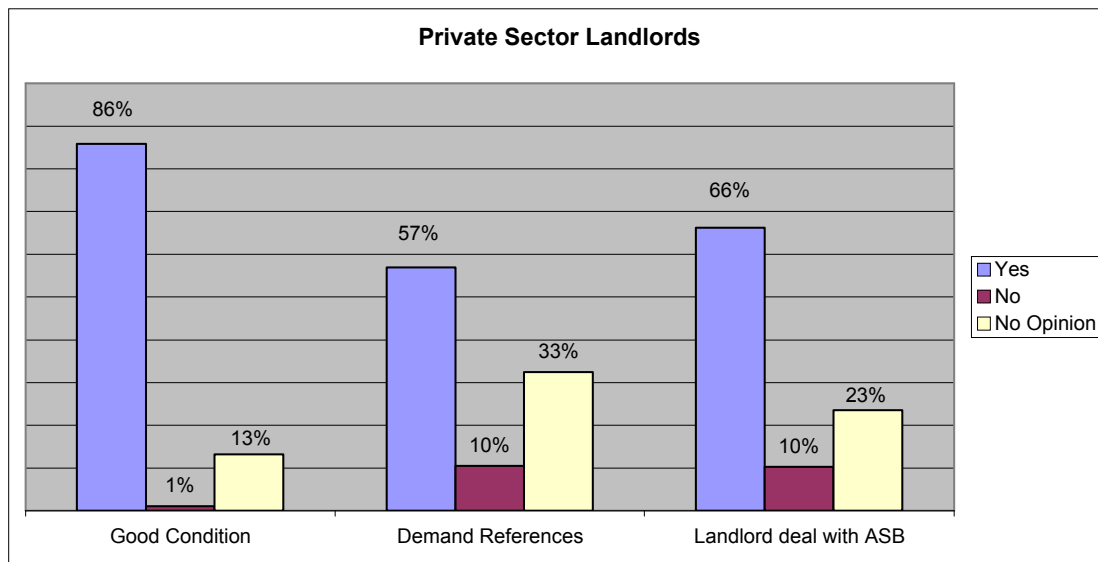
- (i) Privately renting tenants are the predominant cause of the issues selected.
- (ii) Privately renting tenants – who ultimately represent a primarily transient population – have not been exposed to the issues as much as the other respondents.
- (iii) Related to the above, privately renting tenants as migrant to Peterborough – either nationally or internationally – are used to a different social environment. There is also the possibility that they are using the area as a temporary base before moving on and therefore not concerned about their neighbourhood in the same way. Either or all of these speculations could result in a greater tolerance towards ASB and poor neighbourhoods.

Both groups scored their neighbours and general consideration of the area highly; which suggests that some of the ASB is caused impersonally i.e. flytipping, or by people not known to the complainant. The following table displays the percentage of respondents who rated their neighbours and consideration with the lowest two levels.

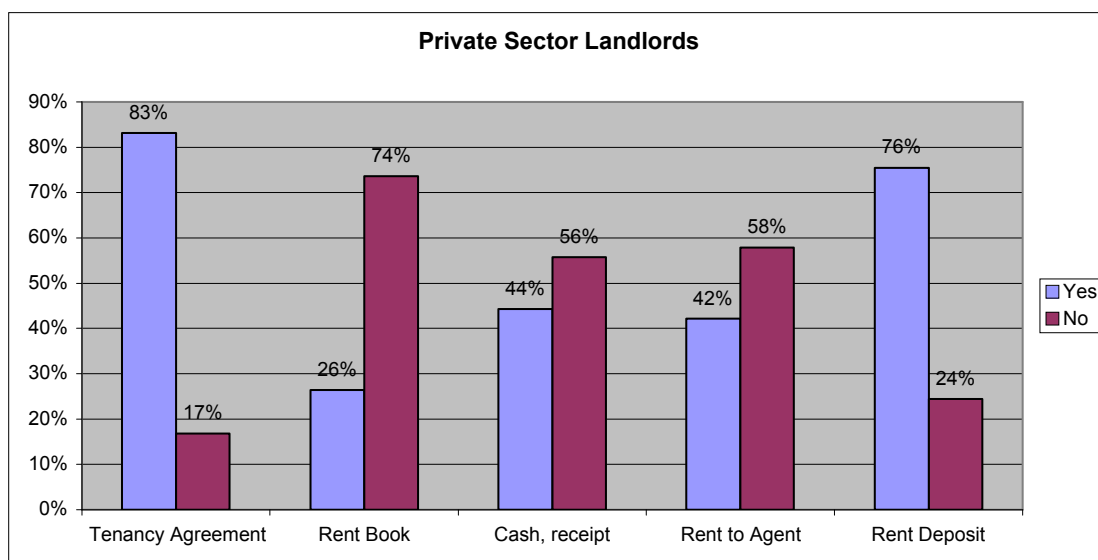
	Neighbours	Consideration
HA	12.4%	15.7%
OO	13.5%	15.1%
PR	6.8%	7.8%

3.13 The survey sought the views of residents in the private sector and what they thought about landlord responsibilities. With a view to introducing Selective Licensing the views were sought of occupants in relation to some of the issues we would seek to address via the licence conditions. Of the respondents who answered the questions an overwhelming number or

residents thought landlords were responsible for keeping their properties in a good condition, obtain references from tenants prior to them moving in and deal with anti social behaviour caused by their tenants in and around their property.



3.14 The residents who were living in private rented accommodation were asked questions about their tenancy and rental details such as whether they had a tenancy agreement, paid rent to an agent or direct to their landlord, if they paid in cash whether they got a receipt or had a rent book.



The data shows that whilst most tenants (83%) have a tenancy agreement or terms of contract 56% of those who pay their rent by cash do not get a receipt for it and therefore the money is not traceable. 76% paid a deposit when they moved in but we have no data to show whether those deposits were placed in bond schemes as is required by law.

When asked if tenants had experienced problems with their landlords 1 in 5 (19.2%) had.

Sources of Guidance and Reference

This document has been researched and drafted with due reference to the following sources of guidance and good practice.

- Approval steps for additional and selective licensing designations in England – published by the Department for Communities and Local Government
ISBN: 978 1 4098 2230 1 – Revised edition 2010
- Evaluation of the impact of HMO Licensing and Selective Licensing – published by the Department for Communities and Local Government
ISBN: 978 1 409815365
- Selective Licensing for Local Authorities – A good practice guide – published by Shelter 2006
ISBN: 97 1 903595 68 8
- Examples of good practice have been gained from other Local Authorities who have completed a Selective Licensing Consultation and had their designations subject to Judicial Review proceedings.