

**Assessment of Private Rented Sector (PRS) Selective Licensing  
and Houses of Multiple Occupancy (HMO) Additional Licensing  
requirements in the London Borough of Bromley  
October 2023**

## **1.0 Introduction**

- 1.1. Private rented properties provide an important part of the housing infrastructure for many people living in the UK. The reasons people rent property are many and varied, such as:
- Less of a financial burden, such as a smaller deposit being required, no solicitors' fees or stamp duty, no buildings insurance, and no maintenance costs.
  - Tenancy terms can vary to suit needs, so planning for a future move is easier.
  - More controls in the rental market mean tenants enjoy more legal protection.
  - No danger of incurring negative equity.
- 1.2 The Private Rented Sector also provides landlords a secure financial investment, either as a regular income or through the eventual release of capital upon sale of the property. However, the reducing amount of private rented sector properties was identified in the Housing Strategy 2019-29 as one of the three main causes of homelessness.
- 1.3 At a time when demand for housing is increasing it is important to balance the need for landlords to achieve their financial aims, whilst ensuring they deliver a good standard of accommodation that meets the requirements of renters.
- 1.4 Bromley identified that in 2020 the three main causes of homelessness in the borough were:
- Loss of private rented accommodation.
  - Parents or friends no longer willing to provide accommodation.
  - Relationship breakdown and domestic violence.
- 1.5 The Strategy made a commitment to introduce mandatory licensing for HMOs of all sizes and invest in resources to monitor and enforce this. Mandatory Licensing of HMO's currently applies to properties occupied by five or more persons from two or more households unless an exemption applies. The Housing Act 2004 sets out thresholds for the local authority to consider the introduction of discretionary licensing schemes, such as Private Rented Sector Selective Licensing or HMO Additional Licensing.
- 1.6 The Council and other public services have a range of tools to address individual incidents and issues such as ASB and crime by individuals, statutory nuisance, building repair, planning, building control and fire safety concerns through existing public service resources and their business-as-usual activities. The main purpose of PRS and HMO licensing is to set minimum standards for the license holder to achieve and sustain, and to address any identified non-compliance. The license fees cover the costs associated with administering and making relevant checks throughout the application process. They can also be used to ensure service capacity to ensure ongoing compliance.

## 2.0 Scope of Assessment

- 2.1 The purpose of this analysis is to determine if LB Bromley can evidence that it meets the requirements to introduce additional Houses in Multiple Occupation (HMO) licensing or selective licensing of private rented properties.
- 2.2 This assessment focusses on data from the 22/23 as data from previous years has become less meaningful in determining trends due to the impact of the UK leaving the EU, Covid-19 pandemic, cost of living crisis, and fluctuating interest rates.
- 2.3 The requirement for adopting HMO Additional Licensing either in the whole borough or part, is that the local authority considers that a significant proportion of a particular type of HMO are being managed ineffectively and give rise, or are likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public. The summary finding from this assessment in relation to this criterion are provided below.
- 2.4 To adopt a Private Rental Sector Selective Licensing scheme at least one of the following conditions must be met. The area:
- i) Is, or is likely to become, an area of low housing demand
  - ii) Has a significant and persistent problem of anti-social behaviour
  - iii) Has a significant number of privately rented properties in a poor condition
  - iv) Is experiencing an influx of migration. Migration refers to movement within the country or from overseas
  - v) Has high levels of deprivation
  - vi) Suffers from a high level of crime

## 3.0 UK and Regional Context

- 3.1 The Covid 19 pandemic, the cost-of-living crises and rising interest rates have impacted on the lifestyles of many people, including the housing options available to them. A House of Lords <sup>1</sup>article published on 8 March 2023 found that ‘higher inflation, interest rates and rents, coupled with a decline in average real-terms earnings, have increased housing costs for many people. Evidence suggests that the impact is being felt across all housing tenure types, but that tenants in the private and social rented sectors have been most adversely affected.’
- 3.2 The GLA Housing and Land, Housing Research Note 9<sup>2</sup> – Understanding recent rental trends in London’s private rented market – published in June 2023 sets out the recent historical context of London’s private rental sector (PRS). Some of the findings relevant to this paper are:

*1.5 The pandemic, cost of living crisis and move to a period of low economic growth has caused volatility which has made it more difficult to determine, evidence, and forecast the factors which have impacted the rental market. These same issues, however, have also exacerbated existing supply and demand issues in the market.*

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<sup>1</sup> [Through the roof? Housing and the cost of living - House of Lords Library \(parliament.uk\)](https://www.parliament.uk/library/subject/sections/house-of-lords/articles/through-the-roof-housing-and-the-cost-of-living/)

<sup>2</sup> [Housing and race equality in London: An analysis of secondary data](https://www.gla.gov.uk/research-and-analysis/housing-research-note-9/)

*7.3 NRLA's Landlord Confidence Index (survey undertaken in the third quarter of 2022) reported that increasing costs was the top reason for their members adjusting rent. Landlord costs are likely to continue rising in the medium term due to energy price and mortgage costs increasing, as well as the costs of retrofit works to improve energy efficiency.*

*7.4 Demand for privately rented homes is currently extremely high and new supply is low, therefore any decrease in the stock of rented homes would risk pushing rents even higher. Sales of rental homes to first-time buyers do simultaneously reduce both supply of, and demand for, rental housing. If, however, a shared house (a house of multiple occupation) is sold by a landlord to a single household, multiple people will require a new home, so the rental supply is likely to fall by more than the demand.*

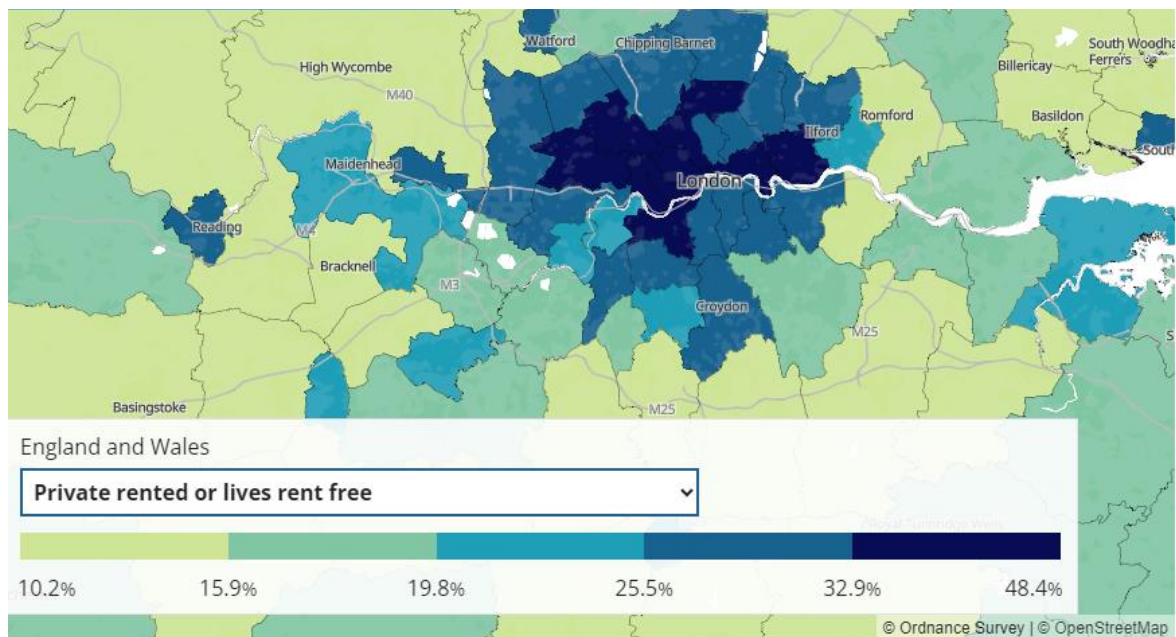
3.3 The Census 2021 highlighted the following changes in the tenure of households across England and Wales:

- A decrease in the proportion of households that owned their accommodation, to 62.5%, 15.5 million in 2021 (from 64.3%, 15.0 million, in 2011)
- An increase in the proportion of households that rented their accommodation, to 37.3%, 9.3 million, in 2021 (from 34.3%, 8.0 million, in 2011)
- A decrease in the proportion of households that lived rent free, to 0.1%, 33,000, in 2021 (from 1.4%, 315,000, in 2011)

3.4 The Census 2021 data on accommodation ownership and renting can be broken down further to show that:

- An increase in the proportion of households that owned the accommodation they lived in outright to 32.8% of households, 8.1 million (from 30.8%, 7.2 million in 2011)
- A decrease in the proportion of households that owned their accommodation with an outstanding mortgage, loan, or shared ownership arrangement to 29.7%, 7.4 million (from 33.5%, 7.8 million in 2011)
- An increase in the proportion of households that rented their accommodation privately to 20.3%, 5.0 million (from 16.7%, 3.9 million in 2011)
- A slight decrease in the proportion of households that were living in the social rented sector, for example through a local council or housing association, to 17.1% 4.2 million (from 17.6%, 4.1 million in 2011)

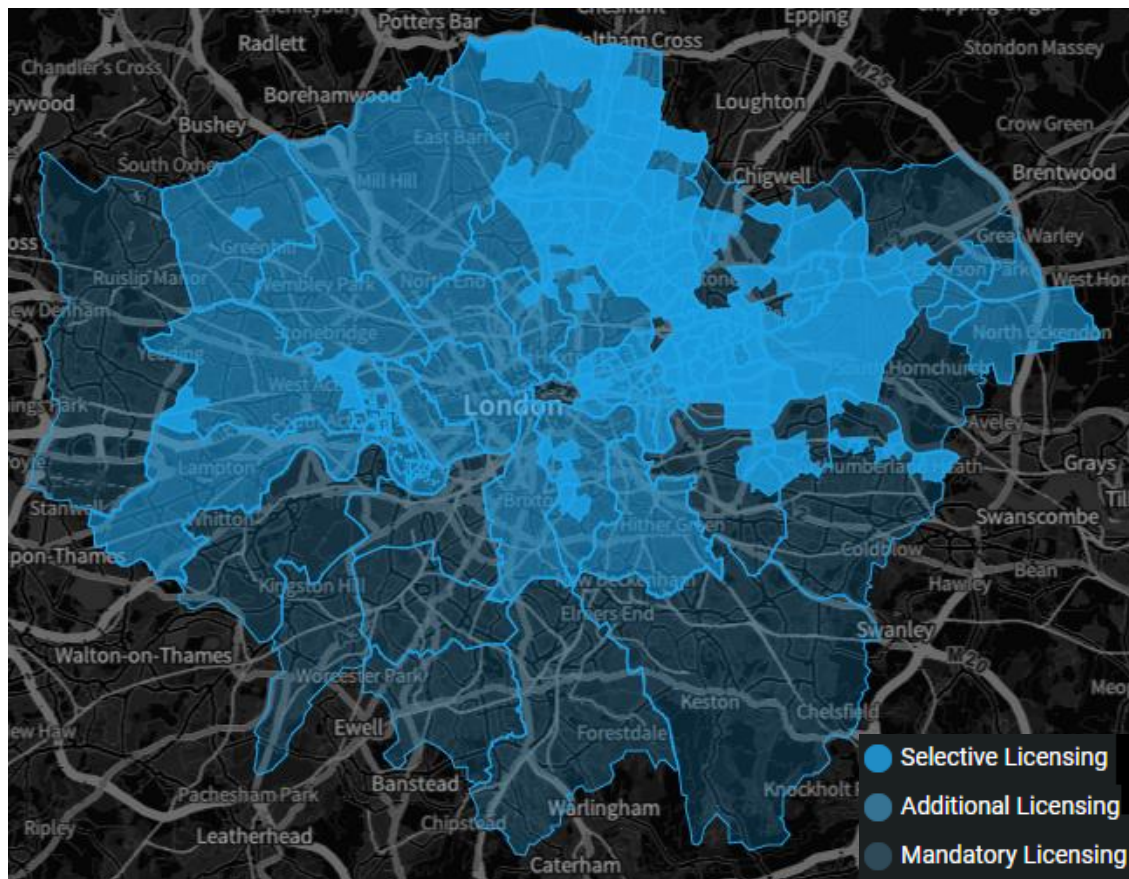
3.5 The Census 2021 shows that, within England, London had the lowest level of overall home ownership of any English region (46.8%). London also had the highest proportion of households that rented privately (30.0%) or in the social rented sector (23.1%). The following image shows the level of privately rented properties across the London Boroughs.



- 3.6 The Census 2021 also found that more adults are leaving their family home later in life and some studies indicate the average age for a person to buy their first home in London is now 35yrs.
- 3.7 The Government's White Paper, 'A fairer private rented sector', sets out the government's long-term vision for a private rented sector (PRS) that is fit for the 21st century and delivers a better deal for tenants. This includes plans to:
- Abolish Section 21 'no-fault' evictions and introduce a simpler tenancy structure
  - Apply the Decent Homes Standard to the PRS for the first time
  - Introduce a new Property Portal to help landlords understand their obligations
  - Introduce a Housing Ombudsman covering all PRS landlords and providing redress for tenants
- 3.8 Anticipated changes in legislation the Houses in Multiple Occupation (Asylum-Seeker Accommodation) (England) Regulations 2023 were laid before parliament on 30 March. They are still in draft with no date of implementation set. If implemented, the regulations will exempt HMOs that are used by the Home Office, or their approved contractors, to accommodate asylum seekers for a period of 2 years from the date the occupants are placed.
- 3.9 In London, no planning permission or licensing is required to use an entire flat, or house, as a short term or holiday let, if:
- Council Tax is paid for the property,
  - Each individual short term let is no more than 90 days,
  - The total number of let days over the calendar year is no more than 90 days.
- 3.10 Short term lets are not proactively monitored by the Authority. Investigations by Planning and Development Control are done in response to complaints and/or received intelligence. If, on investigation, substantive evidence of a breach of the

above controls is found it may result in a Planning Contravention Notice being served on the owner or operator of the property.

- 3.11 The Levelling-Up and Regeneration Bill, which is currently at Report Stage in the House of Lords, includes proposals to introduce firmer regulation to the short-term let market. The government is also actively discussing further protections for tenants in the private rented sector regarding specific issues, for example, protection from eviction and damp, condensation, and mould.
- 3.12 The following map, produced by the Greater London Authority, shows the Housing Act related licensing requirements that are currently adopted across London.



- 3.12 Locally, as can be seen from the Census 2021 data, Bromley residential patterns are not typical of the wider rental picture across the capital. Bromley has approximately 70% owner occupied and 30% rented properties. Of that 30% Bromley private rented properties account for 23,660 (17.5%), of Bromley households, and of that 17.5% properties rented through a private landlord or letting agency account for 15.8%. Other private rented property, such as shared ownership, where part mortgage and part rent are paid, and adult children living with their parent, or living rent free, account for the other 1.7%.
- 3.13 Private sector landlords have legal obligations and responsibilities to protect the safety and rights of their tenants. These include:
- **The London Borough of Bromley's HMO Adopted Standards:** all HMOs regardless of licensing must meet Bromley's adopted standards. These relate to size and amenities as well as fire precautions.

- **Gas Safety:** Landlords must ensure that all gas appliances and flues are maintained in a safe condition. This includes annual gas safety checks conducted by a Gas Safe registered engineer. Landlords must provide tenants with a copy of the Gas Safety Certificate.
- **Electrical Safety:** Landlords are required to ensure that electrical installations are safe and in good working order. Electrical safety checks by a qualified electrician may be necessary. From April 2021, new electrical safety regulations came into force in England, requiring an Electrical Installation Condition Report (EICR) to be provided to tenants.
- **Fire Safety:** Landlords should ensure that the property has adequate fire safety measures, including working smoke detectors on each floor, and that tenants have clear escape routes. Additionally, landlords are responsible for maintaining fire safety equipment and conducting fire risk assessments in certain properties.
- **Energy Performance Certificate (EPC):** Landlords are required to provide tenants with an Energy Performance Certificate (EPC) that rates the energy efficiency of the property. The EPC must be provided at the start of the tenancy.
- **Protection of Deposits:** Landlords must protect tenants' security deposits in a government-approved tenancy deposit scheme. They must also provide tenants with prescribed information regarding the deposit protection within a specific timeframe.
- **Right to Rent Checks:** Landlords must carry out right to rent checks to ensure that tenants have the legal right to reside in the UK.
- **Repairs and Maintenance:** Landlords are responsible for keeping the property in good repair and working order. This includes plumbing, heating, and structural maintenance.
- **Minimum Energy Efficiency Standards (MEES):** Landlords are required to ensure that rental properties meet minimum energy efficiency standards. Properties with low EPC ratings may not be eligible for rental.

3.14 LB Bromley's current corporate strategy 'Making Bromley Even Better' has 5 key ambitions, all of which are in whole or part, relevant to private rented sector residents, and thus, HMOs in LB Bromley, these are:

- For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home
- For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence, and making choices
- For people to make their homes in Bromley and for business, enterprise and the third sector to prosper
- For residents to live responsibly and prosper in a safe, clean, and green environment great for today and a sustainable future
- To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.

- 3.15 The Bromley Housing Strategy 2019-29 sits alongside other key corporate strategies, in particular the Local Plan. These key strategies and plans are interrelated, requiring the successful delivery of all to achieve the Council's objectives. The current Housing Strategy sets out 4 key priorities, these are:
- More homes – increasing the number of homes in Bromley
  - Better quality, more affordable homes
  - Preventing and tackling homelessness
  - Supporting vulnerable people
- 3.16 All of which are relevant, in whole or part, to the private rented sector and HMOs in Bromley. As the price of accommodation continues to increase relative to income there is an increasing need by Bromley residents for more affordable accommodation. HMOs are an important part of that element of housing provision.

#### **4.0 Assessment for Additional HMO Licensing in Bromley**

- 4.1 The requirement for additional HMO licensing, either for the whole borough, or in part, is that the Authority considers that a considerable proportion of HMOs in the borough are:
- i) Ineffectively managed, and
  - ii) Give rise, or are likely to give rise, to one or more problems for occupiers, or members of the public.
- 4.2 In 2022 Bromley put in place a Direction under Article 4 (1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended. The effect of the Direction was to remove the permitted development rights to change a single dwelling into a HMO, planning permission is now required for such a change.
- 4.3 As of 27 July 2023 Bromley has 360 HMO's that fall within the mandatory licensing scheme, a breakdown of these by Ward are shown in Appendix C.
- 4.4 Between 1 April 2022 and 31 March 2023 LB Bromley's Public Protection Division received 34 reports regarding HMOs. In the main these were prompted a) by an HMO tenant raising an issue relating to their tenancy or to the repair of the building, or b) by a concerned member of the community. 10 of the 34 reports received related to allegations that the HMOs in question were unlicensed. On investigation, 5 of the 10 were found to be Licensed HMOs, and no substantive evidence was identified to confirm the remaining 5 were HMOs.

4.5 Table 1, below, shows the breakdown of reports/complaints made by the public regarding HMOs, by Ward.

Table 1

Ward	Total Complaints	Issue raised by HMO Tenant	Issue raised by the community
Beckenham Town and Copers Cope	3	3	0
Bickley and Sundridge	1	1	0
Biggin Hill	2	2	0
Bromley Common and Holwood	2	2	0
Bromley Town	3	1	2
Chelsfield	2	2	0
Chislehurst	0	0	0
Clock House	1	1	0
Crystal Palace and Anerley	0	0	0
Darwin	0	0	0
Farnborough and Crofton	1	0	1
Hayes and Coney Hall	0	0	0
Kelsey and Eden Park	1	1	0
Mottingham Ward	0	0	0
Orpington	2	0	2
Penge and Cator	4	2	2
Petts Wood and Knoll	2	2	0
Plaistow	0	0	0
Shortlands and Park Langley	2	1	1
St Mary Cray	3	2	1
St Paul's Cray	4	3	1
West Wickham	1	1	0

4.6 LB Bromley's Public Protection Division received 111 complaints about privately rented properties between 1 April 2022 and 31 March 2023. This accounts for less than 1% of residents of the 21,415 privately rented properties available in the borough. There were no identified concentrations of complaints in any areas or wards and there is a strong indication that the vast majority of Mandatory licensed HMOs are effectively managed.

4.7 As can be seen the levels of reports/complaints regarding HMOs in each ward are objectively very low.

## 5.0 Assessment for Selective Licensing in Bromley

5.1 To introduce a selective HMO licensing scheme for the private rented sector at least one of the following circumstances must prevail. The area:

- i) Is, or is likely, to become an area of low housing demand
- ii) Has a significant and persistent problem of anti-social behaviour.
- iii) Has a considerable number of privately rented properties in a poor condition.
- iv) Is experiencing an influx of migration from within the country or from overseas.
- v) Has a high level of deprivation.
- vi) Suffers from a high level of crime.



5.2 In accordance with the government guidance<sup>3</sup>, the following factors have been assessed to establish if Bromley or any areas within it, is, or is likely to become, an area of low housing demand, resulting in properties being empty for long periods of time due to it being less desirable to renters than other areas and determine if a selective licensing scheme would improve the quality and retention of private rented properties.

- The value of residential premises in the area, in comparison to the value of similar premises in other areas which the authority considers to be comparable (for example, in terms of type of housing, local amenities, or availability of transport)
- The turnover of occupiers of residential premises (in both rented and owner-occupied properties) and
- The number of residential premises which are available to buy or rent, and the length of time for which they remain unoccupied

5.3 The most recent data available from the Office of National Statistics (ONS) for house prices<sup>4</sup>, which includes flats and maisonettes, at a Local Authority level is for the period of March 2022. This shows that house sales in Bromley were higher than neighbouring outer London boroughs, as shown in Table 2.

5.4 The average price paid for a property in the 10<sup>th</sup> percentile, most affordable, was 7.7% higher than the next highest borough, Greenwich. The total number of properties sold in Bromley in the 12 months to March 2022 was 3.5% of the total properties in Bromley.

Table 2

House Sales & Prices	Bromley	Bexley	Croydon	Greenwich	Sutton	Havering
Total households	135,832	95,300	152,946	114,052	82,348	101,277
Total sales	4,776	2,951	4,220	2,830	2,638	3,585
% of properties sold	3.5%	3.1%	2.8%	2.5%	3.2%	3.5%
Lower quartile price (the actual value of the property in the middle of the lowest 25% of house sales)	£365,000	£310,000	£313,000	£350,000	£302,000	£340,000
Mean price (The average price (total values/total sales))	£568,653	£415,115	£446,264	£504,889	£473,072	£440,899
Median price (The actual value of the property in the middle of all house sales)	£497,750	£393,700	£408,250	£440,000	£425,000	£411,500
Lowest 10% Average (10 <sup>th</sup> percentile) (average for the lowest 10% of properties sold)	£280,000	£243,000	£242,250	£260,000	£247,500	£250,000

5.5 Research<sup>5</sup> undertaken by London Councils found that ‘The proportion of properties for sale that were previously listed to rent has more than doubled in every London borough from the pre-Covid average to the average for 2022.’ The report highlights

<sup>3</sup> [Selective licensing in the private rented sector: a guide for local authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/105222/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities.pdf)

<sup>4</sup> [House price statistics for small areas in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/house-price-statistics-for-small-areas-in-england-and-wales)

<sup>5</sup> [London Councils - Supply of PRS Accommodation - Summary Report.pdf](https://www.london.gov.uk/sites/default/files/2022-03/london-councils-supply-of-prs-accommodation-summary-report.pdf)

that borough are finding it increasingly difficult to access any private rented sector housing.

5.6 The number of households<sup>6</sup> on the waiting list for social housing in Bromley in 2022 was 2,618. Bromley does now have a small stock of accommodation which it owns and rents, having built 60 homes to date with more planned through the Council's Transformation agenda. A large majority of social housing is owned and managed by housing associations and private companies.

5.7 In 2020 the three main causes of homelessness in the borough, as shown in the Housing Strategy, were:

- Loss of private rented accommodation.
- Parents or friends no longer willing to provide accommodation.
- Relationship breakdown and domestic violence.

5.8 Data from the Census 2021 showing the levels of private rented properties by Ward as a percentage of the total households is shown in Table 3.

Table 3

Ward Name	Total Number of Residential Properties (Census 2021)		Census 2021							
			Private Rented				Social Rented			
			Other private rented		Private landlord or letting agency		Rents from Council or other LA		Other Social Rented	
No.	%	No.	%	No.	%	No.	%	No.	%	
Beckenham Town and Copers Cope	8,019	5.9%	200	2.49%	2474	30.85%	55	0.69%	631	7.87%
Bickley and Sundridge	7,149	5.3%	96	1.34%	1098	15.36%	30	0.42%	515	7.20%
Biggin Hill	4,285	3.2%	56	1.31%	294	6.86%	22	0.51%	181	4.22%
Bromley Common and Holwood	7,589	5.6%	117	1.54%	1073	14.14%	133	1.75%	945	12.45%
Bromley Town	6,718	4.9%	170	2.53%	2022	30.10%	53	0.79%	583	8.68%
Chelsfield	4,392	3.2%	61	1.39%	393	8.95%	21	0.48%	222	5.05%
Chislehurst	6,268	4.6%	120	1.91%	825	13.16%	30	0.48%	417	6.65%
Clock House	7,467	5.5%	115	1.54%	1483	19.86%	91	1.22%	781	10.46%
Crystal Palace and Anerley	5,682	4.2%	98	1.72%	1741	30.64%	204	3.59%	1466	25.80%
Darwin	2,287	1.7%	67	2.93%	181	7.91%	14	0.61%	99	4.33%
Farnborough and Crofton	7,053	5.2%	91	1.29%	544	7.71%	32	0.45%	548	7.77%
Hayes and Coney Hall	5,918	4.4%	69	1.17%	439	7.42%	14	0.24%	206	3.48%
Kelsey and Eden Park	5,994	4.4%	103	1.72%	668	11.14%	40	0.67%	500	8.34%
Mottingham Ward	4,633	3.4%	101	2.18%	658	14.20%	179	3.86%	1109	23.94%
Orpington	4,729	3.5%	65	1.37%	492	10.40%	103	2.18%	647	13.68%
Penge and Cator	8,405	6.2%	145	1.73%	1867	22.21%	322	3.83%	2053	24.43%
Petts Wood and Knoll	6,910	5.1%	89	1.29%	746	10.80%	31	0.45%	229	3.31%
Plaiestow	5,494	4.0%	90	1.64%	913	16.62%	80	1.46%	803	14.62%
Shortlands and Park Langley	6,703	4.9%	109	1.63%	1368	20.41%	47	0.70%	367	5.48%
St Mary Cray	7,614	5.6%	112	1.47%	885	11.62%	220	2.89%	1393	18.30%
St Paul's Cray	6,814	5.0%	93	1.36%	724	10.63%	355	5.21%	1889	27.72%
West Wickham	5,709	4.2%	78	1.37%	527	9.23%	17	0.30%	252	4.41%
	135,832	100%	2245	1.65%	21415	15.77%	2093	1.54%	15836	11.66%

<sup>6</sup> [households-on-local-authority-waiting-list.xlsx - Microsoft Excel Online \(live.com\)](#)

- 5.9 According to Council Tax data there are currently around 350 homes in Bromley which are liable for council tax and are recorded as having been empty for two years or longer. This is 0.003% of the total number of residential properties.
- 5.10 During the period 1 April 2022 and 31 March 2023 the Council Public Protection Team received 111 complaints regarding privately rented properties, most relating to matters of disrepair, including mould and damp. Whilst complaints referred to issues which had not been resolved by the landlord in a reasonable timeframe, there was no indication of landlords or properties with repeat complaints. Table 4 shows the complaints by Ward.

Table 4

Ward	Complaint - Private Tenant
Beckenham Town & Copers Cope	5
Bickley & Sundridge	5
Biggin Hill	3
Bromley Common & Holwood	5
Bromley Town	10
Chelsfield	4
Clock House	6
Crystal Palace & Anerley	10
Farnborough & Crofton	4
Kelsey & Eden Park	5
Mottingham	5
Orpington	4
Penge & Cator	16
Plaiestow	6
Shortlands & Park Langley	5
St. Mary Cray	9
St. Paul's Cray	7
West Wickham	3

- 5.11 The number of properties available for rent within the borough boundary is not possible to establish with absolute accuracy as the information is collated by postcode and some postcodes have coverage in Bromley but are substantially in neighbouring boroughs.
- 5.12 Data obtained from [home.co.uk](https://www.home.co.uk) shows 431 properties available for rent in postcode areas BR1, BR2, BR3, BR4, BR5, BR6, BR7, SE20 and TN16 on 22 September 2023, a breakdown of the property types and rental values is shown by postcode in Table 5. Rental rates varied from an average of £575 for a room in BR5 to £5,356 for a five-bedroom property in BR3. Appendix B provides full details for all postcodes.

Table 5

	BR1		BR2		BR3		BR4		BR5		BR6		BR7		SE20		TN16	
	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent
Total properties for rent on 23/9/23	78		62		102		8		26		52		37		42		24	
Properties listed in the last 14 days	31		27		39		3		6		9		10		10		6	
Under £250	0		0		0		0		0				1		0		0	
rent £250 - £500 pcm	1		0		0		0		1		0		1		0		1	
rent £500 - £1,000 pcm	6		6		6		0		1		5		0		1		5	
rent £1,000 - £2,000 pcm	36		27		62		3		10		25		13		31		11	
rent £2,000 - £5,000 pcm	31		29		31		5		12		21		21		9		6	
rent over £5,000 pcm	5		0		3		0		2		1		1		1		1	
Property type - Room	7	£808	3	£1,227	7	£999	0	£0	2	£575	3	£900	0	£0	1	£775	0	£0
Property type - Flat	37	£1,972	25	£1,831	64	£1,856	3	£1,933	4	£1,363	19	£1,427	14	£1,832	34	£1,917	3	£2,058
Property type - House	30	£2,820	30	£2,525	28	£2,757	5	£2,540	18	£2,224	30	£2,597	20	£2,760	4	£2,906	9	£2,538
one bedroom properties	9	£1,350	6	£1,242	24	£1,438	0		4	£1,375	10	£1,309	7	£1,293	12	£1,469	4	£1,063
two bedroom properties	27	£1,936	17	£1,886	37	£1,831	1	£1,650	4	£1,525	11	£1,622	7	£2,071	16	£1,929	4	£2,556
three bedroom properties	16	£2,366	18	£2,328	13	£2,408	4	£2,150	5	£2,230	13	£2,165	10	£2,525	4	£3,861	1	£1,750
four bedroom properties	7	£2,979	11	£2,825	13	£2,915	3	£2,750	8	£2,648	10	£2,725	7	£2,771	3	£3,400	3	£4,265
five bedroom properties	8	£4,806	1	£4,000	2	£5,356	0	£0	0	£0	3	£2,900	3	£4,217	0	£0	0	£0

5.13 The LB Bromley Housing Strategy 2019-29 identified that ‘The average rent of a two bed roomed home is £1,411 per month ([www.home.co.uk](http://www.home.co.uk)). The total benefit that can be claimed for a dwelling of this size is £1,097 per month.’ As shown in the Table above this the prices for a 2-bedroom dwelling in Bromley range from £1,525 to £2,226, showing the affordability gap has increased.

5.14 International migration from mid-2019 to mid-2020 accounted for a net increase of 417 persons and domestic migration accounted for a net decrease of 961, overall net migration in Bromley equates to a net decrease of 544 persons, as shown below.

Area Name	Mid-2018 to Mid-2019				Mid-2019 to Mid-2020			
	Long-Term International Migration	Outflow	Internal (w ithin UK)	Migration	Long-Term International Migration	Outflow	Internal (w ithin UK)	Migration
London	192,920	115,511	255,299	349,291	200,389	115,844	218,902	320,283
Bromley	1,540	1,011	19,250	19,884	1,448	1,031	17,032	17,993

5.15 The National [Index of Multiple Deprivation](#) <sup>7</sup>(IMD) is the official measure of relative deprivation in England. It follows an established methodological framework measuring 39 separate indicators, organised across 7 distinct domains. The IMD measure deprivation on a ‘relative’ rather than an absolute scale, so a neighbourhood ranked 100th is more deprived than a neighbourhood ranked 200th, but this does not mean it is twice as deprived.

5.16 The seven domains of deprivation are as follows:

- The **Income Deprivation** Domain measures the proportion of the population experiencing deprivation relating to low income. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests).
- The **Employment Deprivation** Domain measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This

<sup>7</sup> [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

- The **Education, Skills and Training Deprivation** Domain measures the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and one relating to adult skills.
- The **Health Deprivation and Disability** Domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.
- The **Crime** Domain measures the risk of personal and material victimisation at local level.
- The **Barriers to Housing and Services** Domain measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability.
- The **Living Environment Deprivation** Domain measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living environment measures the quality of housing, while the 'outdoors' living environment contains measures of air quality and road traffic accidents.

5.17 However, when focussing on the IMD deciles for Barriers to Housing, whilst St Pauls Cray remains the Ward with the highest concentration of LSOAs in the 50<sup>th</sup> percentile, Mottingham, St Mary Cray, and Crystal Palace & Anerley Wards, also have over 70% of their LSOAs in the 50<sup>th</sup> percentile. A breakdown of each Ward is shown in Table 6 below.

Table 6

Ward	No. Properties	% of borough properties	LSOA's by IMD Barriers To Housing Decile										% Ward LSOA's up to 50%	% Ward LSOA's 60% Decile	
			1	2	3	4	5	6	7	8	9	10			
Beckenham Town & Copers Cope	8,019	5.90%	1	3	1	2	1							100%	0%
Bickley & Sundridge	7,149	5.30%	1	3	2	2	2	1						91%	9%
Biggin Hill	4,285	3.20%		1		2			2	1				50%	50%
Bromley Common & Holwood	7,589	5.60%	2	3	1		1	2						78%	22%
Bromley Town	6,718	4.90%		1	4	3								100%	0%
Chelsfield	4,392	3.20%	1		2	1	1	2	1					63%	38%
Chislehurst	6,268	4.60%	2	1	2	2	2	2	1					90%	10%
Clock House	7,467	5.50%		1	2	4	3					1		91%	9%
Crystal Palace & Anerley	5,682	4.20%	4	2										100%	0%
Darwin	2,287	1.70%	3											100%	0%
Farnborough & Crofton	7,053	5.20%	1	2	2	1	2	2	1					73%	27%
Hayes & Coney Hall	5,918	4.40%		3	3	1	1			2				80%	20%
Kelsey & Eden Park	5,994	4.40%		3	1	1	2	1	1					78%	22%
Mottingham	4,633	3.40%	1	1	1	2	1	1						86%	14%
Orpington	4,729	3.50%		3		2	2	1						88%	13%
Penge & Cator	8,405	6.20%	1	4	4	2	1							100%	0%
Petts Wood & Knoll	6,910	5.10%				1	3	3	1			1		44%	56%
Plaiestow	5,494	4.00%		2	1	2	1							100%	0%
Shortlands & Park Langley	6,703	4.90%		3	3	3								100%	0%
St Mary Cray	7,614	5.60%		3	5	1	2							100%	0%
St Paul's Cray	6,814	5.00%	3	3	4	1								100%	0%
West Wickham	5,709	4.20%		1	2	3	1	3						70%	30%

5.18 The Barriers to Housing and Services Domain measures the physical and financial accessibility of housing and local services. The indicators fall into 2 sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing, such as affordability. The sub-domain indicators are:

- Road distance to a post office
- Road distance to a primary school
- Road distance to a general store or supermarket
- Road distance to a GP surgery
- Household overcrowding
- Homelessness
- Housing affordability

5.19 Data relating to crime and anti-social behaviour is obtained from SafeStats and Police.UK. The level of detail available does not provide address information so it is not possible to directly link incidents to specific properties, or tenure types, therefore, information on a Ward basis has been assessed.

5.20 Whilst reported crime increased across London by 6%, in Bromley it reduced by 2% in 2022/23 when compared to the previous year. Biggin Hill, Chelsfield, Farnborough & Crofton, Kelsey & Eden Park and Mottingham Wards saw increases in crime reporting, however, the Ward boundary changes, which took effect on 5 May 2022, means that data at Ward level cannot be accurately compared with the previous year. Bromley Town, St Paul's Cray and Penge & Cator Wards remain the areas with the highest numbers of crime allegations in Bromley. Information by Ward is shown in Appendix C.

5.21 Reported incidents of anti-social behaviour reduced by 16% in Bromley, however, the Ward boundary changes that took effect on 5 May 2022 mean that the data at

Ward level cannot be accurately compared to the previous year. Some wards, Biggin Hill, Chelsfield, Darwin and Kelsey & Eden Park Wards appear to have had increases. Although St Paul's Cray and Penge and Cator Wards had significant reductions in reported ASB, 15.8% and 22.4% respectively, they remain the areas with the highest number and rates per 1,000 population in Bromley. Information by Ward is shown in Appendix C.

- 5.22 Tenants, the Council, the Police and the Fire Brigade have a range of tools available to them should they need to address individual properties or landlords as stated in paragraph 3.13.

## **6.0 Conclusion**

- 6.1 Privately rented properties account for 30% of homes in London, higher than the national average of just over 20%. In Bromley, properties rented through a private landlord or letting agency account for 15.8%. Three Wards, Beckenham Town & Copers Cope, Bromley Town and Crystal Palace and Anerley Ward, have levels of private rented sector properties that are over 30%.
- 6.2 Bromley remains an area with high demand for its properties, both for sale and rent. House sales in Bromley are higher than neighbouring outer London boroughs and the average price paid for a property in the 10<sup>th</sup> percentile, most affordable, was 7.7% higher than the next highest borough, Greenwich. The total number of properties sold in Bromley in the 12 months to March 2022 was 3.5% of the total properties available and there are low levels of properties being vacant for long periods of time.
- 6.3 Bromley had a net population decrease of 544 when considering international and domestic migration.
- 6.4 In 2022/23 Bromley Council received 111 complaints related to the private rented sector and 34 complaints related to HMO's or possible HMOs. This accounts for less than 1% of the available 21,415 privately rented properties. Most of the complaints relating to matters of disrepair, including mould and damp, however, there were no identified concentrations of complaints in particular areas.
- 6.5 The level of detail about crime allegations and ASB is not available to the Council to directly link them to specific properties or tenure types, therefore, information on a Ward basis has been assessed.
- 6.6 Whilst crime increased across London by 6%, in Bromley it reduced by 2% in 2022/23 when compared to the previous year. However, Biggin Hill, Chelsfield, Farnborough & Crofton, Kelsey & Eden Park and Mottingham Wards saw increases in crime reporting.
- 6.7 Reported incidents of anti-social behaviour in Bromley reduced by 16%. A small number of Wards, Biggin Hill, Chelsfield, Darwin and Kelsey & Eden Park, appear to have had an increased number of reported incidents when compared to the previous year, however, due to Ward boundary changes, which took effect on 5 May 2022, the data at Ward level cannot be accurately compared.
- 6.8 Fifty of the boroughs 191 Lower Super Output Areas (LSOAs) are in Deciles 1 to 5. St Paul's Cray Ward has the highest concentration of these, with no areas above

Decile 5. When focussing on the IMD Barriers to Housing domain St Paul's Cray remains the Ward with the highest concentration of LSOAs in the 50<sup>th</sup> percentile. Mottingham, St Mary Cray and Crystal Palace and Anerley Wards also have over 70% of their LSOAs in the 50<sup>th</sup> percentile.

- 6.9 Following a comprehensive review, members should note that currently Bromley does not meet the statutory tests for the introduction of an additional HMO Licensing scheme or a Private Rented Sector Selective Licensing scheme.



## Appendix A - Definition of a House in Multiple Occupation (HMO)

A property is a HMO if one of the following applies:

- a) The property is a house or flat occupied as a main residence by three or more persons in two or more households (a household can be an individual, couple or family) where the toilet, bathroom or kitchen facilities are shared by the occupiers.
- b) The building has been converted into self-contained flats where one or more of the flats has its toilet, bathroom or kitchen facilities located outside the flat across a communal hall or landing.
- c) The building was converted into self-contained flats before 1991 (or after 1991 without Building Regulation Approval), is occupied as a main residence by three or more persons living in two or more of the flats and less than two thirds of the flats are owner-occupied.

Certain types of properties are not classed as HMOs for the purpose of the Housing Act 2004 (other than for the Housing Health and Safety Rating System) and, as a result, would not be subject to an Additional HMO licensing scheme. These properties are:

- Buildings owned or managed by a public body (such as the NHS or police), a local housing authority or a registered social landlord
- Student accommodation managed directly by an educational establishment
- Buildings which are already regulated (and where the description of the building is specified in regulations), such as care homes, bail hostels etc. Domestic refuges are not exempt.
- Certain buildings that are controlled or managed by a co-operative society
- Two persons – any building occupied by only two persons in two households
- Owner occupied buildings.
- A building where the residential accommodation is ancillary to the main use of the building, for example, religious buildings, conference centres etc.

All HMOs must comply with the local authority's adopted standards for HMOs and will require a licence if it is occupied by five or more persons from 2 or more households. A household can be an individual, couple or family.

APPENDIX B – All Rental Properties available on 22 September 2023

	BR1		BR2		BR3		BR4		BR5		BR6		BR7		BR8		DA14	
	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent
Total properties for rent on 23/9/23	78		62		102		8		26		52		37		10		25	
Properties listed in the last 14 days	31		27		39		3		6		9		10		6		8	
Under £250	0		0		0		0		0		0		1		0		0	
rent £250 - £500 pcm	1		0		0		0		1		0		1		0		0	
rent £500 - £1,000 pcm	6		6		6		0		1		5		0		0		1	
rent £1,000 - £2,000 pcm	36		27		62		3		10		25		13		8		20	
rent £2,000 - £5,000 pcm	31		29		31		5		12		21		21		2		4	
rent over £5,000 pcm	5		0		3		0		2		1		1		0		0	
Property type - Room	7	£808	3	£1,227	7	£999	0	£0	2	£575	3	£900	0	£0	0	£0	1	£850
Property type - Flat	37	£1,972	25	£1,831	64	£1,856	3	£1,933	4	£1,363	19	£1,427	14	£1,832	1	£3,600	16	£1,517
Property type - House	30	£2,820	30	£2,525	28	£2,757	5	£2,540	18	£2,224	30	£2,597	20	£2,760	9	£1,828	5	£2,694
one bedroom properties	9	£1,350	6	£1,242	24	£1,438	0	£0	4	£1,375	10	£1,309	7	£1,293	0	£0	7	£1,392
two bedroom properties	27	£1,936	17	£1,886	37	£1,831	1	£1,650	4	£1,525	11	£1,622	7	£2,071	1	£1,650	11	£1,557
three bedroom properties	16	£2,366	18	£2,328	13	£2,408	4	£2,150	5	£2,230	13	£2,165	10	£2,525	7	£1,771	3	£2,217
four bedroom properties	7	£2,979	11	£2,825	13	£2,915	3	£2,750	8	£2,648	10	£2,725	7	£2,771	2	£3,000	0	£0
five bedroom properties	8	£4,806	1	£4,000	2	£5,356	0	£0	0	£0	3	£2,900	3	£4,217	0	£0	2	£3,535

	CO0		CO3		CO6		SE9		SE12		SE19		SE20		SE26		TN14		TN16	
	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent	Avail.	Ave. Rent
Total properties for rent on 23/9/23	417		34		14		46		38		83		42		76		20		24	
Properties listed in the last 14 days	163		11		7		6		12		21		10		18		7		6	
Under £250	2		0		0		0		0		0		0		0		0		0	
rent £250 - £500 pcm	2		1		0		1		0		0		0		0		2		1	
rent £500 - £1,000 pcm	41		3		0		2		0		1		1		5		3		5	
rent £1,000 - £2,000 pcm	246		19		5		22		15		40		31		29		6		11	
rent £2,000 - £5,000 pcm	114		10		7		20		23		41		9		31		9		6	
rent over £5,000 pcm	12		1		2		1		0		1		1		11		0		1	
Property type - Room	31	£762	2	£913	0	£0	2	£680	1	£1,400	1	£700	1	£775	8	£968	1	£450	0	£0
Property type - Flat	301	£1,989	17	£1,654	7	£1,984	21	£2,304	17	£1,857	58	£2,082	34	£1,917	43	£2,864	7	£1,461	3	£2,058
Property type - House	69	£2,288	14	£2,816	6	£4,324	21	£2,215	19	£2,789	22	£3,214	4	£2,906	25	£3,992	11	£2,713	9	£2,538
one bedroom properties	123	£1,453	6	£1,924	0	£0	4	£1,500	5	£1,460	14	£1,636	12	£1,469	8	£1,494	3	£1,450	4	£1,063
two bedroom properties	138	£1,987	12	£1,573	7	£2,147	13	£1,643	12	£1,843	40	£2,278	16	£1,929	21	£2,405	6	£1,648	4	£2,556
three bedroom properties	63	£2,591	5	£2,240	2	£2,125	16	£2,330	9	£2,294	9	£2,250	4	£3,861	23	£3,312	1	£3,100	1	£1,750
four bedroom properties	24	£2,905	0	£0	2	£4,498	4	£4,138	5	£3,160	13	£3,262	3	£3,400	15	£5,523	1	£2,650	3	£4,265
five bedroom properties	6	£3,717	7	£3,553	2	£4,400	1	£1,650	5	£3,350	4	£4,575	0	£0	0	£0	5	£4,000	0	£0

APPENDIX C

