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# London Borough of Brent

Houses in Multiple Occupation: Housing Stock Condition and Stressors Report

December 2024



#### **Executive Summary**

Metastreet were commissioned by the London Borough of Brent to review Houses in Multiple Occupation in the borough and assess stressors related to the private rented subtenure.

The detailed information provided in this report will facilitate the development and delivery of Brent's housing interventions and enable a targeted approach to tackling poor housing.

The main aim of this review was to investigate and provide accurate estimates of:

- Information on the number of Houses in Multiple Occupation (HMOs) as a subset of the private rented sector (PRS).
- Levels of serious hazards that might amount to a Category 1 & 2 hazard (HHSRS)
   within the HMO population.
- Other housing related stressors, including antisocial behaviour (ASB & service demand) linked directly to HMOs.
- Assist the council to make policy decisions, including a possible redesignation of property licensing schemes under Part 2 of Housing Act 2004.

Metastreet has developed a stock-modelling approach based on metadata and machine learning to provide insights about the prevalence and distribution of a range of housing stressors and factors.

The housing models are developed using unique property reference numbers (UPRN) as a data key, which provide detailed analysis at the property level.

Data records used to form the foundation of this report include but are not limited to:

Council tax	Property licensing	Other council	Tenancy deposit data
		interventions records	
Housing benefit	Private housing	ASB complaints and	Energy Performance
	complaints and	interventions records	data
	interventions records		

#### **Key Findings**

- The HMO population of Brent is calculated to be 7,131 properties.
- The HMO population in Brent is made up of two main categories; licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); predicted hidden HMOs that share basic amenities (2,209).
- The most common HMO property type in Brent are houses (70%), while bungalows are the least common property types (1%).
- Brent recorded 902 HMO complaints (one or more) at HMOs (all types) from tenants and others over a 5-year period (April 2019 – March 2024).
- There were 166 repeated complaints in Brent at All HMOs (known and hidden) for the period April 2019 – March 2024.
- There are 1,955 HMO (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 & 2 hazards, HHSRS).
- Of the known and Predicted/hidden HMO population, 27% are predicted to have at least 1 hazard (Category 1 & 2, HHSRS), more than double the PRS national average (12%).
- There were 1,525 HMOs (all types) linked to Anti-social Behaviour incidents in the period
   April 2019 March 2024.
- A total of 2,366 ASB incidents have been matched to all HMO properties (known and predicted hidden) for the period April 2019 – March 2024.
- There were 518 HMOs (all types, known and Predicted/hidden) with repeat ASB incidents over the period April 2019 — March 2024.
- Over a 5-year period (2019-24), Brent Council used its regulation powers to serve 101 Civil Penalty Notices (CPN) to HMOs (known and Predicted/hidden).
- Between April 2019 and March 2024, Brent Council served 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation.
- Between April 2019 and March 2024, Brent Council served 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation.

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## 1 Introduction & Project Objectives

Metastreet were commissioned by the London Borough of Brent to review its HMO housing stock with a focus on the following key areas:

- Distribution of HMOs
- Housing conditions of HMOs
- HMO related stressors, including Anti-Social Behaviour (ASB) & service demand.
- Quality of management of HMOs, including regulation and enforcement

The report provides the council with the evidence base for developing housing and service interventions. The report also assists with the council's responsibility to review its housing stock as set out under Part 1, Section 3 of the Housing Act 2004.

For the purposes of this review, it was decided that a ward-level summary is the most appropriate basis to assess housing conditions across Brent, built up from property level data.

Predictive tenure models (Ti) have been developed as part of this project which are unique to Brent, they include:

- Serious housing hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS A-D)
- Houses in Multiple Occupation (shared amenity HMOs, Section 254)

All data used in this report is taken from Brent's own service records over the last 5 years (April 2019 – March 2024) and other open-source property level data. An updated data frame focused on HMOs has been developed specifically for this project.

The appendices to the report contain a summary of the data and a more detailed report methodology.

#### 2 London Borough of Brent and HMOs

Brent is a London borough in North London. It covers an area of 43.2km<sup>2</sup>. It borders the London boroughs of Barnet and Harrow to the northwest, Camden to the east, Ealing to the south, with Hammersmith and Fulham to the south. Kensington & Chelsea, and the city of Westminster lie to the southeast. Districts include Wembley in the west, <sup>1</sup>[59].

Houses in Multiple Occupancy (HMO) identified as part of this study have been divided into two main categories and two separate licence types. The first category is known HMOs that share basic amenities (Housing Act 2004, Section 254) that have been licenced under either **Mandatory** or **Additional** licensing powers.

The second category are properties that are predicted **hidden** HMO that share basic amenities (Housing Act 2004, Section 254) but have not been licensed under either Mandatory or Additional licensing powers (Predicted/hidden HMOs). It is assumed that this group of properties is inhabited by three or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom.

Any HMO meeting the following criteria requires a **Mandatory licence** in Brent.

- Dwellings inhabited by five or more occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom. This regulation applies irrespective of the number of floors.
- Self-contained flats located within a building comprising up to two flats. If either or both
  flats are inhabited by five or more individuals from two or more separate households,
  licensing is Mandatory.

Any HMO meeting the following criteria requires an Additional licence in Brent.

 Dwellings inhabited by 3 or 4 occupiers, residing in two or more distinct households, and sharing common amenities like a kitchen or bathroom.

It's important to note, there are number of exemptions from HMO property licensing, including:

- Buildings managed by a local housing authority, registered social landlord, police, fire & rescue authority or health service body.
- Buildings already regulated under certain other statutory provisions (Schedule 1 to SI 2006
   Number 373).

<sup>&</sup>lt;sup>1</sup> Wikipedia, November 2024, <a href="https://en.wikipedia.org/wiki/London Borough of Brent">https://en.wikipedia.org/wiki/London Borough of Brent</a>

- Certain student halls of residence.
- Buildings occupied principally for the purposes of a religious community whose principal occupation is prayer, contemplation, education or the relief of suffering; and
- Building's owner occupied with no more than two lodgers.

Therefore, it should not be assumed that the number of HMOs is equal to the number of licensable HMOs in any given area.

#### 3 Methodology

Tenure Intelligence (Ti) uses council held and publicly available data to identify tenure and analyse property stressors, including property conditions and ASB. Metastreet has collaborated with the council to create a residential property data warehouse focused on the known and predicted HMO population. This has been developed by using a mixture of licence holder and application flags held by the authority and predictive models. Therefore, there is a very high confidence that the 'known' study group are HMOs because they have been assessed and, in many cases, inspected by the authority to establish their tenure.

The project has included linking large amounts of council and externally held data to unique property references (UPRN).

Machine learning has been used for property condition predictions based on training data taken from a contemporary sample of known outcomes. Results are analysed to produce a summary of housing stock, predictions of Category 1 and/or high scoring Category 2 hazards, HHSRS A-D.

Different combinations of risk factors were systematically analysed for their predictive power in terms of key outcomes. Risk factors that duplicated other risk factors but were weaker in their predictive effect were systematically eliminated. Risk factors that were not statistically significant were also excluded through the same processes of elimination.

It is important to note that this approach can never be 100% accurate as all large datasets and statistical models include some level of error. A more detailed description of the methodology and the specific factors selected to build predictive models for this project can be found in Appendix 2.

All specified and requested council held longitudinal data is from April 2019 – March 2024 unless otherwise specified.

Where appropriate and where the data allows, the findings for different HMO types (described previously) have been presented separately.

## 4 HMO Population: Distribution & Occupancy

The HMO population can be examined in two ways; by looking at the number of HMO properties across the various wards, and by the occupancy type (kind of property inhabited).

#### 4.1 HMO populations

The HMO population in Brent is made up of two main categories (described previously); licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); and Predicted/hidden HMOs that share basic amenities (2,209). The total HMO population in Brent is therefore calculated to be **7,131**.

Licensed HMOs (Additional and Mandatory) are spread across all wards in Brent. Wembley Park has the highest (931) number of HMO licenses (Figure 1).

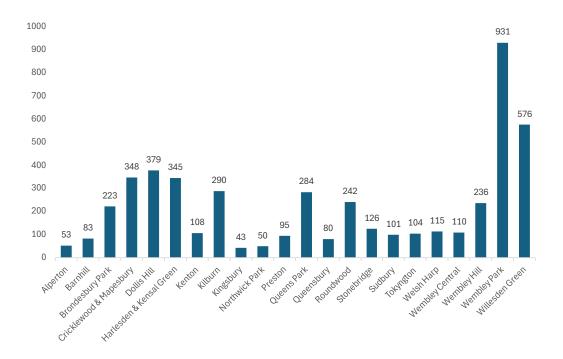
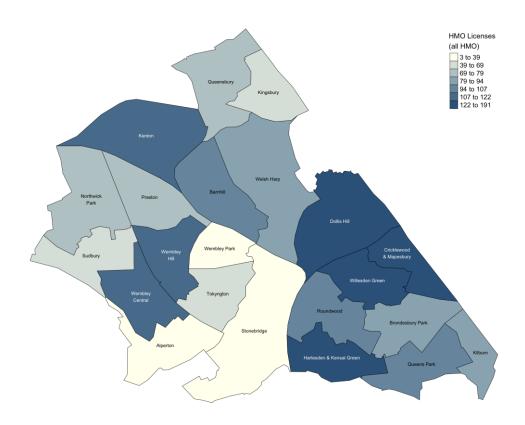


Figure 1. Licensed HMO population (Additional and Mandatory) by ward (Source Ti 2024).

HMO licenses for Additional and Mandatory HMOs are distributed throughout Brent, with a slight bias towards the eastern wards (Map 1).



Map 1. Distribution of licensed HMOs (Additional & Mandatory) by ward (Source: TI 2024, Map by Metastreet).

## 4.1.1 All HMOs

The HMO population is distributed across all wards. Wembley Park (931) has the most HMOs, whilst Alperton has the least (102) (Figure 2).

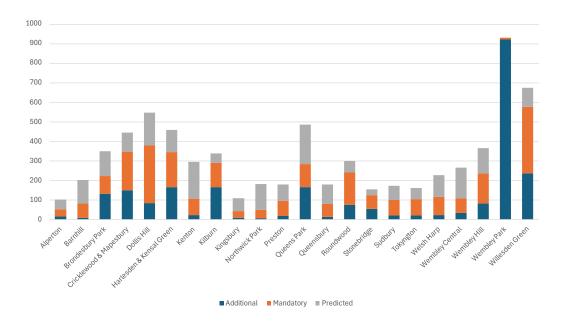
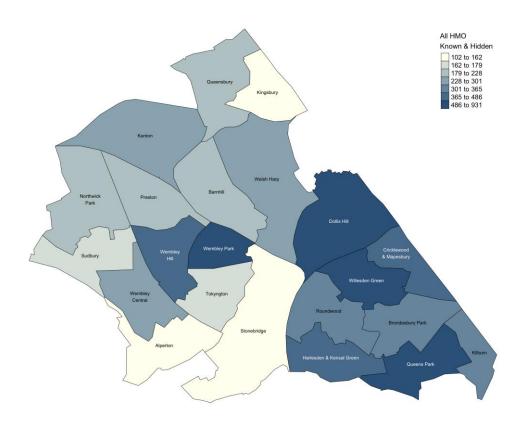


Figure 2. Total HMO population (all types) by ward (Source Ti 2024).

HMO properties are spread throughout the borough of Brent, although there are generally greater numbers in the eastern wards (Map 2).



Map 2. Distribution of All HMOs by ward (Source: TI 2024, Map by Metastreet).

## 4.1.2 Additional HMOs

Wembley Park has the most Additional HMOs (923) but is something of an anomaly (Figure 3). Other wards with substantial Additional HMOs are Willesden Green (237), Harlesden & Kensal Green (167), Queens Park (166), and Kensal (165).

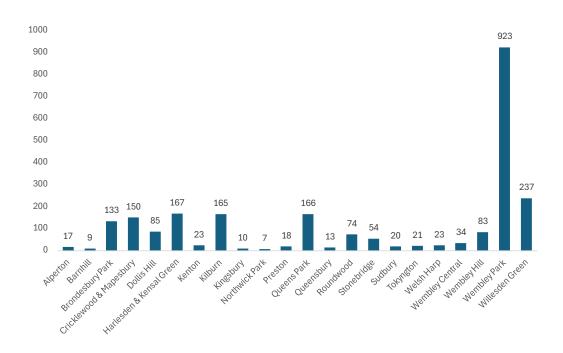
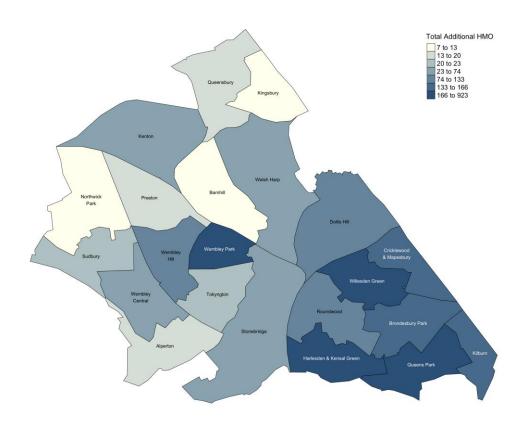


Figure 3. Number of Additional HMOs by ward (Source Ti 2024).

Although Additional HMOs are spread throughout the borough of Brent, there are more in the eastern wards (Map 3).



Map 3. Distribution of Additional HMOs by ward (Source: Ti 2024, Map by Metastreet).

## 4.1.3 Mandatory HMOs

There are similar numbers of Mandatory HMOs (2,490) and Additional HMOs (2,432). Willesden Green ward (339) has the highest number of Mandatory licences (Figure 4).

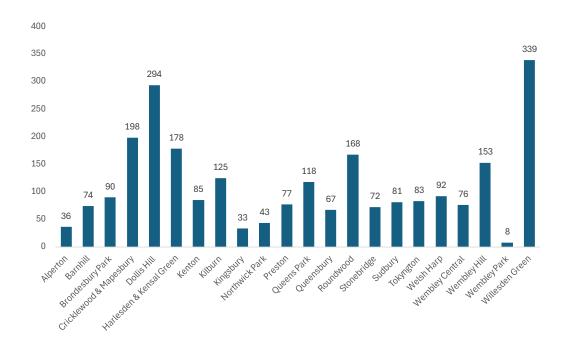
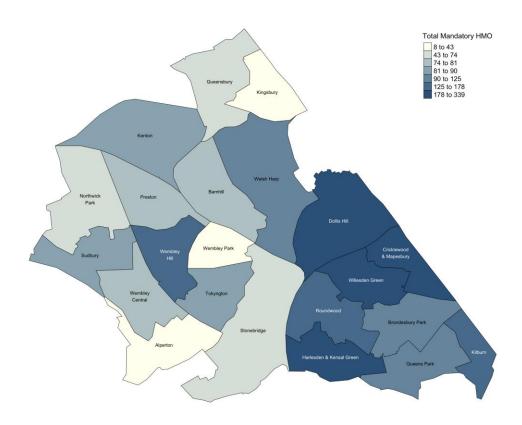


Figure 4. Number of Mandatory HMOs by ward (Source Ti 2024).

Although Mandatory HMOs are distributed across the borough of Brent, there are more in the eastern wards (Map 4).



Map 4. Distribution of Mandatory HMOs by ward (Source: Ti 2024, Map by Metastreet).

## 4.1.4 Predicted/Hidden HMOs

Predicted/hidden HMOs (2,209) make up 31% of the total. This group may either be exempt from licencing, unlicenced, or licenced as a single-family dwelling. It is not possible to identify from the data (where licensable) if the predicted hidden HMO properties would fall under Additional or Mandatory requirements. Queens Park has the highest number of Predicted/hidden HMOs (202) (Figure 5).

The predictions regarding whether a property is classified as an HMO are a critical component of the modelling exercise. Each UPRN is evaluated individually as part of the modelling process, with the model assigning a likelihood (probability) to its classification. Once the modelling has completed the

## predictions, we use a probability of 90% as a cut-off.

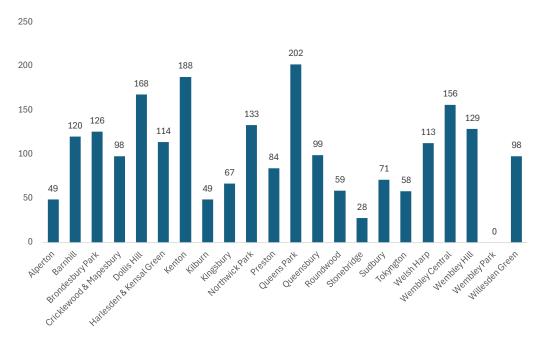
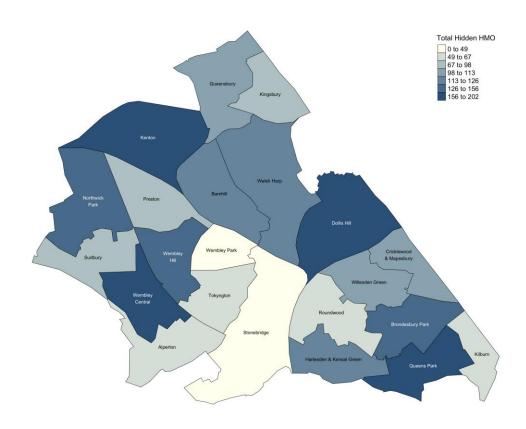


Figure 5. Number of Predicted/hidden HMOs by ward (Source Ti 2024).

Predicted/hidden HMOs are distributed across all wards (except Wembley Park, which has none); with greater concentrations not showing any geographical bias (Map 5).



Map 5. Distribution of Predicted/hidden HMOs by ward (Source: Ti 2024, Map by Metastreet).

The percentage of Predicted/hidden HMOs for each ward was calculated (Figure 6). A high percentage of Predicted/hidden HMOs would show that there are potentially many more unlicensed HMOs than in a ward with a low percentage. Northwick Park for example has the highest percentage of Predicted/hidden (therefore unlicensed) HMOs (73%).

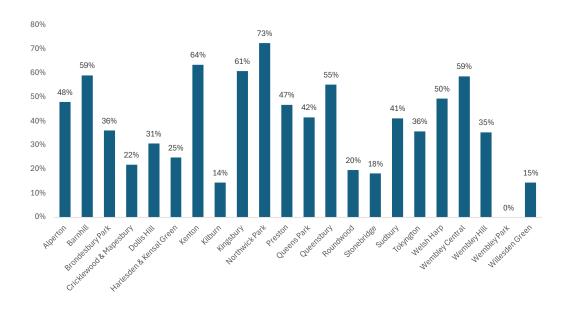


Figure 6. Percentage of Predicted/hidden HMOs by ward (Source Ti 2024).

## 4.2 Property type

HMO property type profile offers an indication of HMO makeup, density, and construction type. Inspection data and Energy Performance Certificate (EPC) records have been analysed. The most common property type in Brent are houses (70%), while bungalows are the least common property types (1%). Flats make up 26% of the HMO properties (Figure 7).

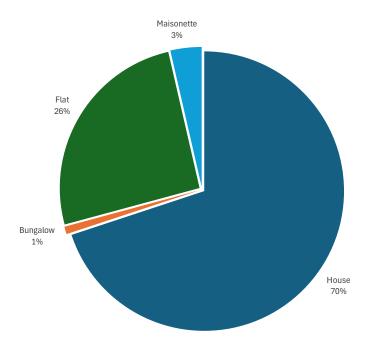


Figure 7. HMO (all types, known and hidden) property types (Source Ti 2024).

Flats and houses make up most of the housing types in Brent. Of properties for which data is available, flats make up 65% of the total (with houses 31%) (Source: Ti data from EPC). However, the proportion of flats that are HMO (Additional, Mandatory, or Predicted/hidden) is much smaller (26%), whilst the proportion of houses that are HMO is larger (70%, Figure 7).

The prevalence of houses as HMO is typical of the sector. Houses generally have more space and lend themselves to being HMOs. Thus, the higher proportion of houses as HMO when compared to the overall housing stock.

#### 5 HMO Standards & Management

Housing conditions are affected by the level of maintenance, quality of repair & management, the age of the property, thermal efficiency, and type of construction.

Proper management of HMOs is necessary to safeguard the tenants and the wider community. The HMO Management Regulations require the manager to keep all parts of the HMO safe, clean and well maintained. They also place a duty on tenants of HMOs to cooperate with the manager and not damage any fire safety equipment<sup>2</sup>. HMOs can exhibit some of the poorest housing conditions of any tenure if poorly managed. Therefore, HMO managers are required to comply with licence conditions and HMO Management Regulations. These include space standards, repair obligations, fire precautions and testing, waste management and tenancy management<sup>3</sup>.

#### 5.1 Complaints from tenants and others

Complaints made by tenants and others to Brent Council regarding poor property conditions and inadequate property management are a direct indicator of low quality and poorly managed HMOs.

#### **5.1.1** All HMOs

Brent recorded 902 complaints about HMOs (known and hidden) from tenants and others over the period April 2019 – March 2024. Dollis Hill has the greatest total number of HMO complaints (105), whilst Wembley Park (1) has the fewest (Figure 8).

<sup>&</sup>lt;sup>2</sup> The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007, <a href="https://www.legislation.gov.uk/uksi/2007/1903/contents/made">https://www.legislation.gov.uk/uksi/2007/1903/contents/made</a>

<sup>&</sup>lt;sup>3</sup> Regulating the Privately Rented Housing Sector, Evidence into Practice, Edited By Jill Stewart, Russell Moffatt, (2022) <a href="https://www.routledge.com/Regulating-the-Privately-Rented-Housing-Sector-Evidence-into-Practice/Stewart-Moffatt/p/book/9781032159690">https://www.routledge.com/Regulating-the-Privately-Rented-Housing-Sector-Evidence-into-Practice/Stewart-Moffatt/p/book/9781032159690</a>

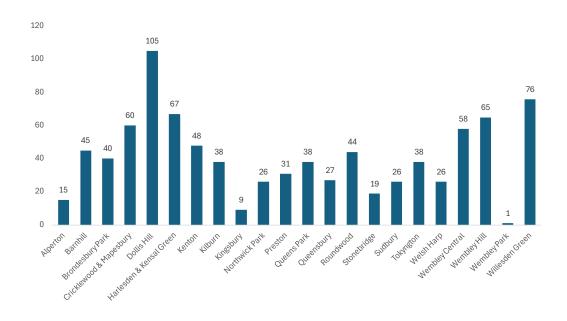
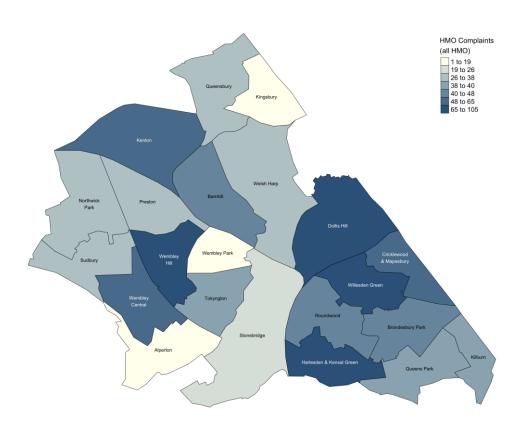


Figure 8. Number of HMO complaints (one or more) from tenants and others by ward (All HMOs, April 2019 – March 2024) (Source: Ti 2024).

Complaints are spread throughout the borough, with a slight bias towards the east (Map 6).



Map 6. Distribution of complaints (one or more) from tenants and others by ward at all HMOs (known and hidden, April 2019 – March 2024)

## 5.1.2 Mandatory HMOs

There were 441 complaints by tenants and others to Brent Council linked to Mandatory HMOs. Dollis Hill (66) has the highest number of complaints (Figure 9).

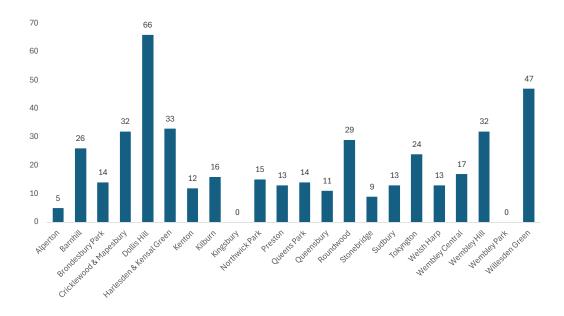
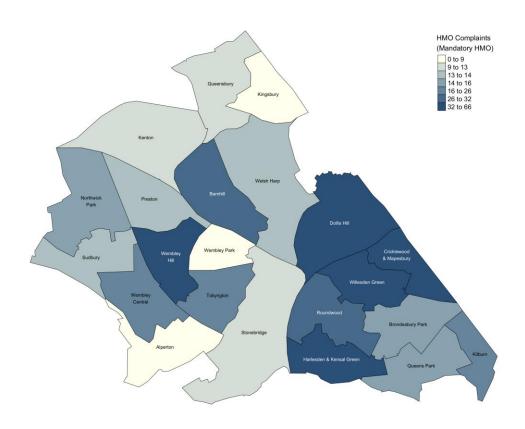


Figure 9. Number of complaints (one or more) at Mandatory HMOs from tenants and others by ward (April 2019 – March 2024) (Source: Ti 2024).

Complaints are distributed across the borough, with a bias towards the eastern wards (Map 7).



Map 7. Distribution of complaints (one or more) from tenants and others by ward at Mandatory HMOs (April 2019 – March 2024).

#### 5.1.3 Additional HMOs

There were 157 complaints made by tenants and others to Brent Council linked to Additional HMOs (Figure 10). The highest number of complaints (21) were at Cricklewood and Mapesbury.

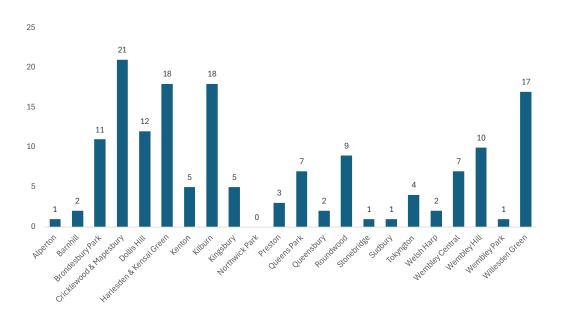
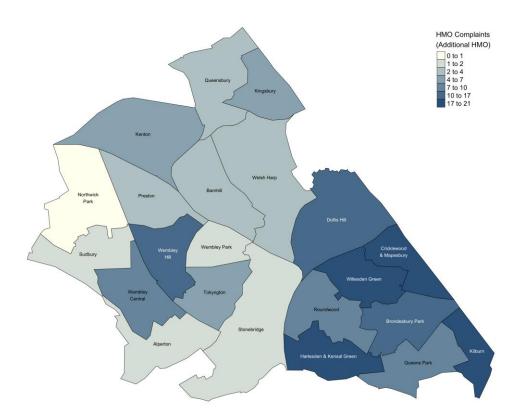


Figure 10. Number of HMO complaints (one or more) from tenants and others by ward linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024).

Concentrations of complaints come predominantly from the eastern wards (Map 8).



Map 8. Distribution of HMO complaints (one or more) from tenants and others by ward linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## 5.1.4 Predicted/Hidden HMOs

There were 304 HMO complaints made by tenants and others to the Council linked to Predicted/hidden HMOs. Wembley Central (34) has the highest number of complaints (Figure 11).

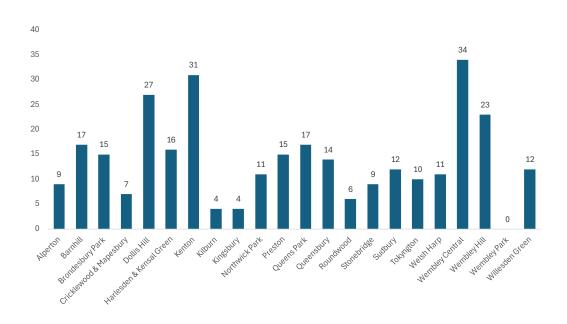
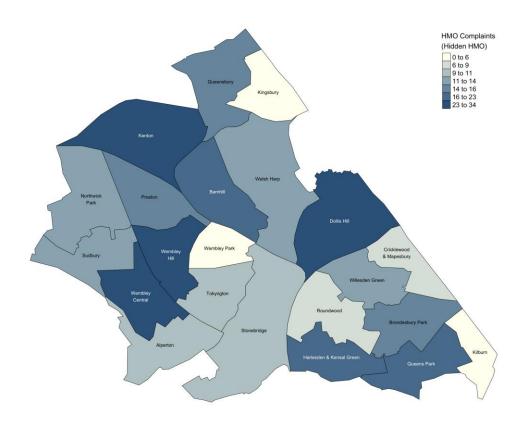


Figure 11. Number of HMO complaints (one or more) from tenants and others by ward linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024).

Complaints are distributed across the entire borough. Concentrations of complaints come predominantly from Wembley Central, Wembley Hill, Kenton, and Dollis Hill wards (Map 9).



Map 9. Distribution of HMO complaints (one or more) from tenants and others by ward at Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## **5.2** Repeated Complaints

Properties with repeated complaints could indicate that HMO managers are failing to comply with licence conditions and HMO Management Regulations.

#### **5.2.1** All HMOs

For the period April 2019 – March 2024 there were 166 repeated complaints at All HMOs (known and hidden). Dollis Hill (23) had the highest number (Figure 12).

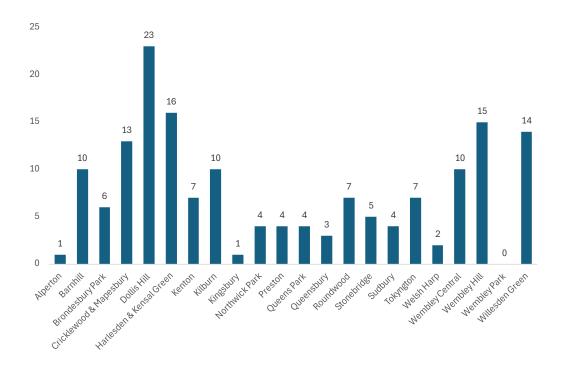
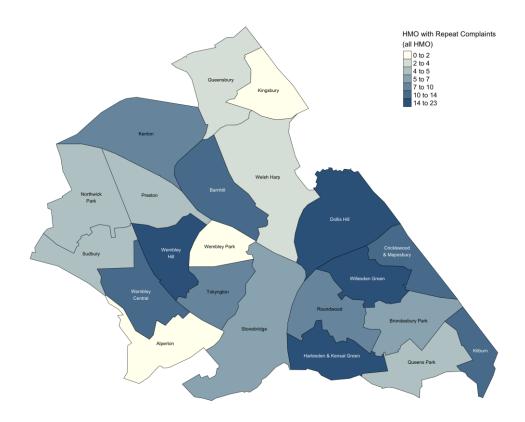


Figure 12. Number of repeated complaints from tenants and others at All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints were received across Brent, with a slight bias towards the eastern wards (Map 10).



Map 10. Distribution of repeated complaints from tenants and others at All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## 5.2.2 Mandatory HMOs

For the period April 2019 – March 2024 there were 84 repeated complaints at Mandatory HMOs. Dollis Hill (14) had the highest number (Figure 13).

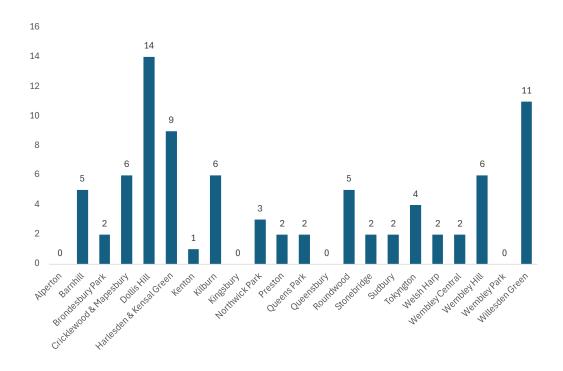
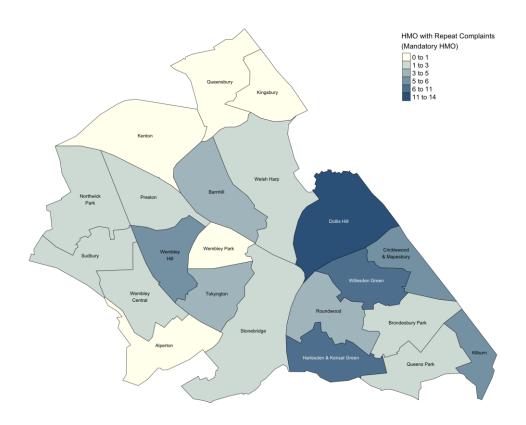


Figure 13. Number of repeated complaints from tenants and others at Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints at Mandatory HMOs were widespread in Brent, with a bias towards the eastern wards (Map 11).



Map 11. Distribution of repeated complaints from tenants and others at Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 5.2.3 Additional HMOs

For the period April 2019 – March 2024 there were 29 repeated complaints at Additional HMOs. Cricklewood & Mapesbury (6) had the highest number (Figure 14).

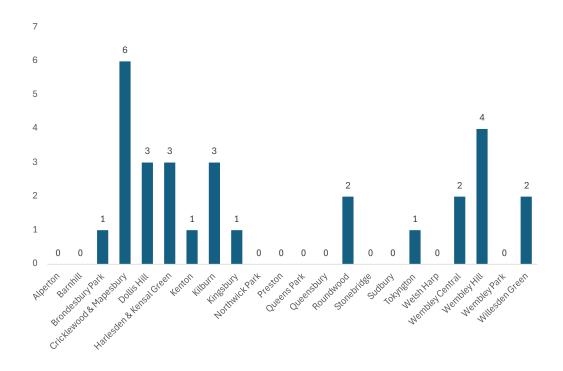
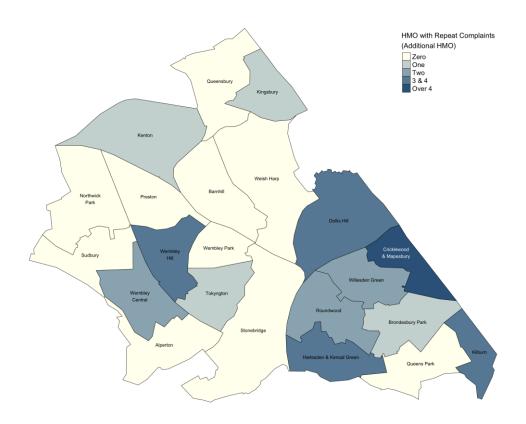


Figure 14. Number of repeated complaints from tenants and others at Additional HMOs by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints at Additional HMO were generally from the eastern wards (Map 12).



Map 12. Distribution of repeated complaints from tenants and others at Additional HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 5.2.4 Predicted/hidden HMOs

For the period April 2019 – March 2024 there were 53 repeated complaints at Predicted/hidden HMOs. Wembley Central (6) and Dollis Hill (6) had the highest number (Figure 15).

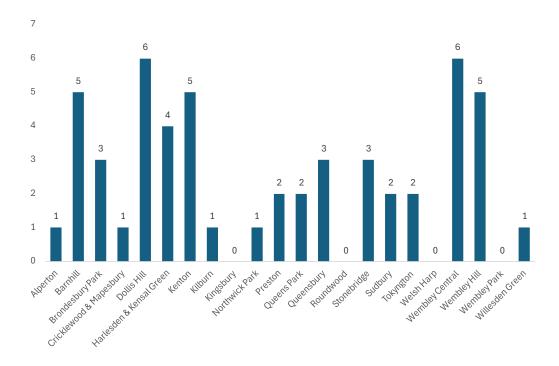
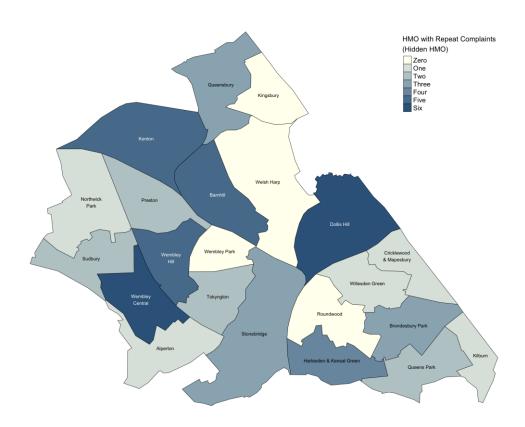


Figure 15. Number of repeated complaints from tenants and others at Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024).

Repeated complaints at Predicted/hidden HMOs were widespread throughout Brent (Map 13).

Although Dollis Hill (6) had the highest, there are other wards across Brent with similar numbers.



Map 13. Distribution of repeated complaints from tenants and others at Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

# 5.2.5 Summary

Overall, there were 902 complaints, and 166 repeated complaints. Mandatory HMOs had the most (441 & 81), with Predicted/hidden HMOs not far behind (304, 53) (Figure 16).

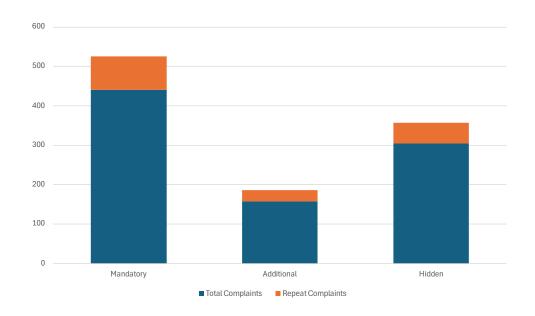


Figure 16. Number of complaints from tenants and others at HMOs April 2019 – March 2024 (Source Ti 2024).

Although the absolute numbers of complaints and repeat complaints varied between HMO types (Figure 16), the proportion of all complaints that were repeated was remarkably consistent (Figure 17). For the different HMO types the values are all around 18%, i.e. 18% of all complaints are from HMOs where there have been previous complaints.

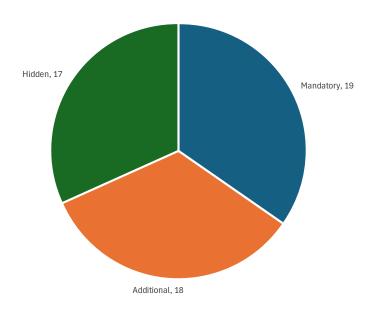


Figure 17. Percentage of all complaints that were repeated complaints, for HMO types April 2019 – March 2024 (Source Ti 2024).

#### 5.3 Predicted HMO hazards

The Housing Health and Safety Rating System (HHSRS) is a system for assessing housing conditions. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity.

Currently the HHSRS assessment identifies 29 hazard types that give rise to hazards, under 4 main public health categories; physiological requirements; psychological requirements; protection against infection; protection against accidents<sup>4</sup>. Serious hazards (Category 1 & 2, HHSRS) hazards have a physiological or psychological impact on the occupant and may result in medical treatment<sup>5</sup>.

In 2023, 12% of private rented dwellings in England had at least one Category 1 hazard; this was a higher proportion than the average for the total housing stock (8%), and significantly higher than owner occupied dwellings (9%) or social rented dwellings (4%). Furthermore, the private rented sector had the highest proportion of non-decent homes (21%)<sup>6</sup>.

Using a sample of properties that are known to have at least one serious housing hazard (see above), it is possible to predict the number of HMO properties with at least one serious hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS A-D) across the HMO population (known and predicted hidden) (Figure 17). Further details of the methodology can be found in Appendix 2.

#### **5.3.1** All HMOs

There are 1,955 HMO (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Dollis Hill (191) has the greatest number, whilst Wembley Park (3) has the fewest (Figure 18). This represents 27% of the known and Predicted/hidden HMO population, more than double the PRS national average (12%)<sup>7</sup>.

<sup>&</sup>lt;sup>4</sup> HHSRS) operating guidance, <a href="https://www.gov.uk/government/publications/hhsrs-operating-guidance-housing-act-2004-guidance-about-inspections-and-assessment-of-hazards-given-under-section-9">https://www.gov.uk/government/publications/hhsrs-operating-guidance-housing-act-2004-guidance-about-inspections-and-assessment-of-hazards-given-under-section-9</a>

<sup>&</sup>lt;sup>5</sup> Housing Health and Rating System, Operation Guidance, 2006,

 $<sup>\</sup>underline{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/15810/142631.pdf}$ 

<sup>&</sup>lt;sup>6</sup> EHS Headline 2022-2023, <a href="https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report">https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report</a>

Fig. 1 EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report

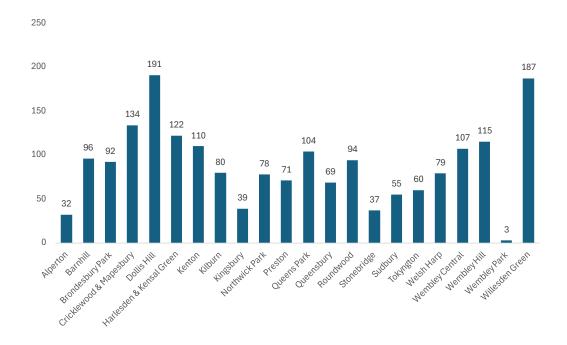
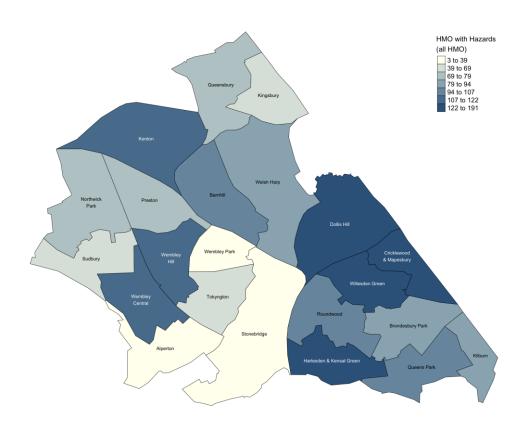


Figure 18. HMOs (shared amenities, known and hidden) with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

HMO properties (known and hidden) with predicted serious hazards are spread throughout the borough of Brent, although there is a bias towards the eastern wards (Map 14).



Map 14. Distribution of All HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

#### 5.3.2 Additional HMOs

There are 255 Additional HMOs properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Willesden Green (50) has the highest number of predicted hazards, whilst Alperton (1) has the lowest (Figure 19).

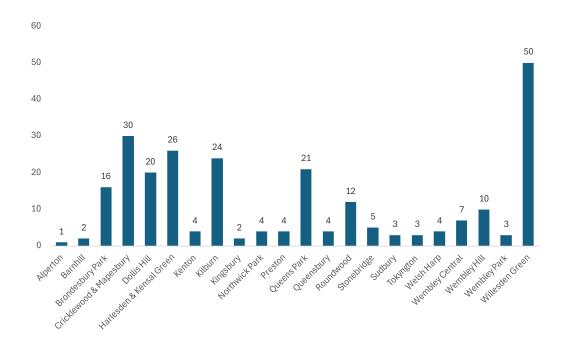
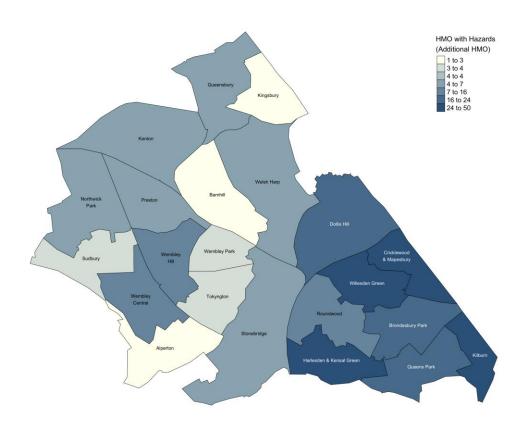


Figure 19. Additional HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

Concentrations of properties with serious hazards can be found predominantly in the southern and eastern wards (Map 15).



Map 15. Distribution of Additional HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet)

# 5.3.3 Mandatory HMOs

Mandatory HMOs with serious hazards (784) are distributed across the whole borough (Figure 20). New Willesden Green (98) and Dollis Hill (97) have the highest number of predicted hazards.

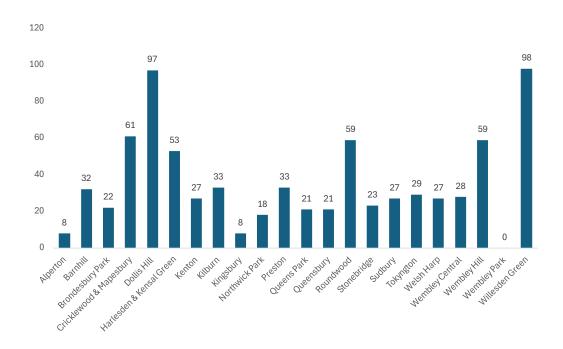
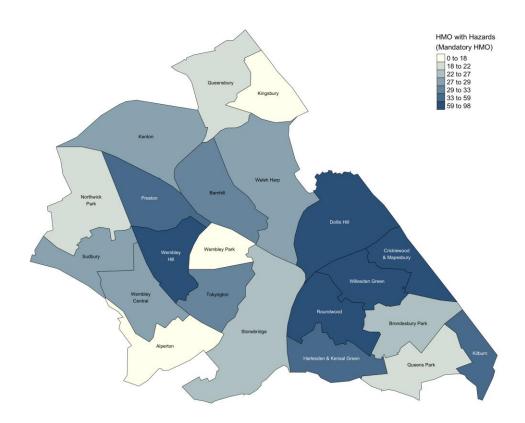


Figure 20. Mandatory HMOs with one or more predicted serious hazards predicted (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

As with other types of HMO, concentrations of properties with serious hazards can be found predominantly in the southern and eastern wards (Map 16).



Map 16. Distribution of Mandatory HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

## 5.3.4 Predicted/hidden HMOs

Predicted/hidden HMOs with serious hazards (916) are distributed across the whole borough. Kenton (79) and Dollis Hill (74) wards have the highest number of Predicted/hidden HMOs with predicted serious hazards (Figure 21).

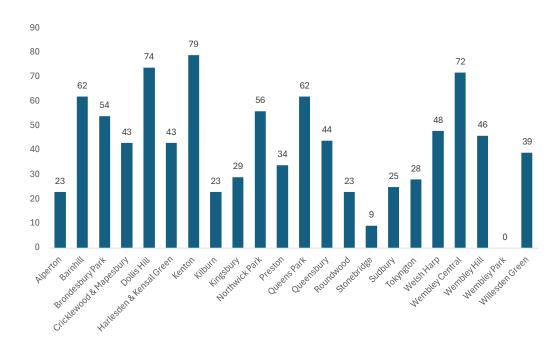
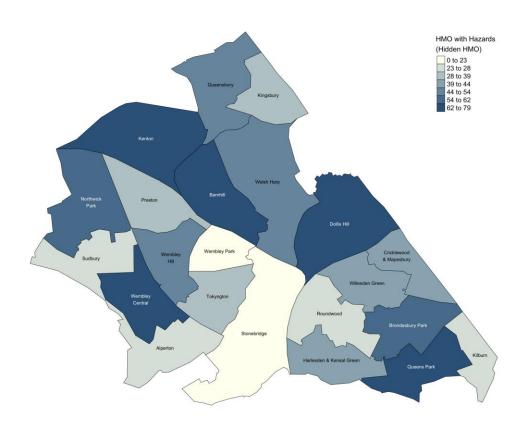


Figure 21. Predicted/hidden HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024).

Concentrations of Predicted/hidden HMO properties with serious hazards can be found throughout Brent, with hot spots in Queens Park, Dollis Hill, Kenton, Barnhill, and Wembley Central (Map 17).



Map 17. Distribution of Predicted/hidden HMOs with one or more predicted serious hazards (Category 1 and/or high scoring Category 2 hazards, HHSRS) by ward (Source: Ti 2024, Map by Metastreet).

#### 5.4 Energy performance

An EPC rating is an assessment of a property's energy efficiency. It is primarily used by buyers or renters of residential properties to assess the energy costs associated with heating a house or flat. The rating is from A to G. A indicates a highly efficient property, G indicates low efficiency.

The energy efficiency of a dwelling depends on the thermal insulation of the structure, on the fuel type, and the size and design of the means of heating and ventilation. Any disrepair or dampness to the dwelling and any disrepair to the heating system may affect efficiency. The exposure and orientation of the dwelling are also relevant.

As part of this study, 3,620 EPC ratings were matched to known HMO properties (Figure 22). All figures have been modelled from this group. The housing stock is dominated by EPC ratings C & D, with B & E ratings less so. The A, F & G ratings are the least common.

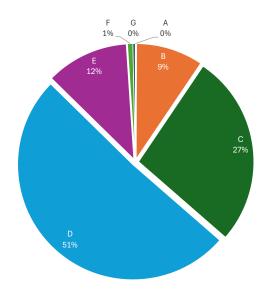


Figure 22. EPC rating distribution for HMOs (A-G) (Source: Ti 2024).

The EPC ratings are distributed around the D rating (51%), with progressively smaller contributions towards the lower and upper ends (Figure 23).

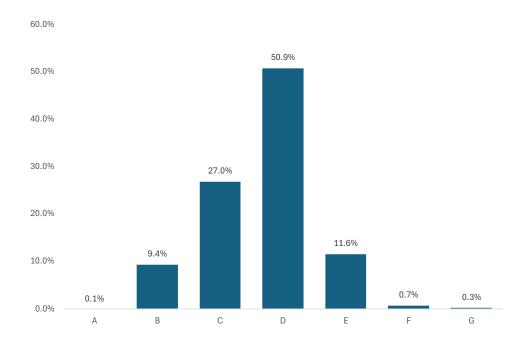


Figure 23. EPC ratings across Brent for known HMOs, showing the percentage of properties in each band (Source Ti 2024).

Ratings by property type show that bungalows fall in the C—E categories (Figure 24). Flats, show a largely even spread, with some B ratings but also E—F ratings. Houses show a wide range across all ratings A—G. There are far more houses and flats than bungalows and maisonettes.

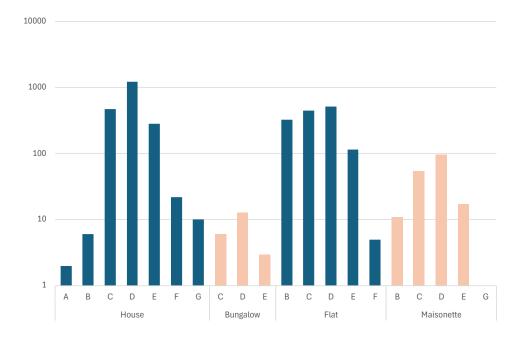


Figure 24. EPC ratings for known HMOs in Brent, split by property type (note that this is a logarithmic scale, Source Ti 2024).

Brent has 458 HMO EPC records that are E, F, & G rated (Figure 25). EPC ratings E, F, & G represent properties with the least energy efficiency. Willesden Green (76) and Cricklewood & Mapesbury (49) have the highest number of EPC ratings E-G (Figure 25).

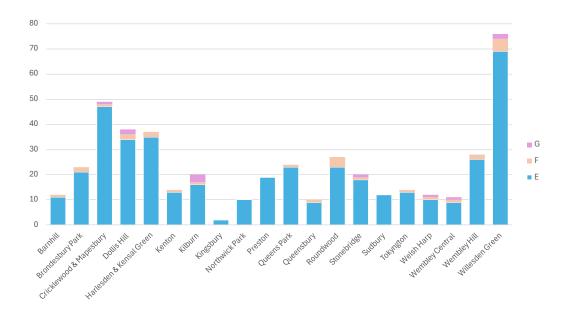


Figure 25. EPC rating (E-G) distribution for HMOs by ward (Source: Ti 2024).

The Minimum Energy Efficiency Standard (MEES) came into force in England and Wales on 1 April 2018. The regulation applies to PRS properties and mandates that all dwellings must have an EPC

rating of E and above to be compliant. It has been calculated using the matched addresses that 1.1% (102) of HMO properties (known and Predicted/hidden) in Brent have F and G rating. It is possible that these properties have been excluded from the MEES regulation requirements on technical grounds.

#### 6 HMO Anti-Social Behaviour (ASB)

ASB incidents, recorded by the council over the period April 2019 – March 2024 have been linked to HMO properties and analysed. Understanding ASB emanating from HMOs (all types) helps support the development of strategic interventions. Different assessments of ASB were recorded:

- Number of HMOs with one or more ASB incidents.
- Total number of ASB incidents.
- Repeat ASB, i.e. number of HMO with 2 or more ASB incidents.

#### 6.1 Number of HMO linked to ASB

The number of properties linked to ASB can inform as to how widespread anti-social behaviour is.

#### 6.1.1 All HMOs

Across Brent 1,525 HMO properties (all types) have recorded ASB incidents. It is important to note, where incidents could not be matched directly at the property level with HMO, ASB incidents have been discarded from this study. For example, ASB incidents investigated on a street corner that cannot be directly linked to an HMO property have been excluded. Dollis Hill (157) has the highest number of HMOs with ASB incidents (Figure 26).

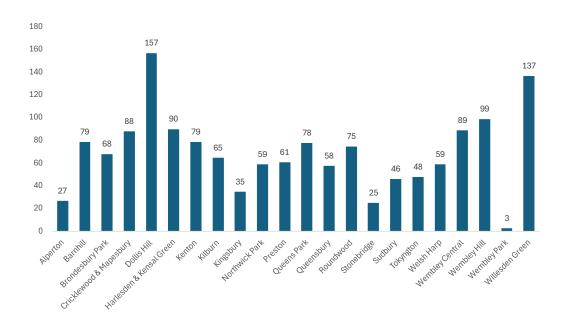
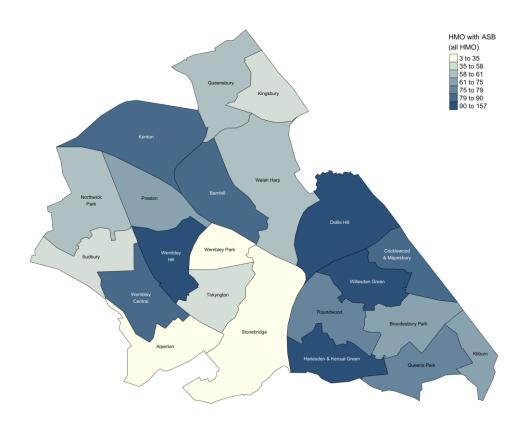


Figure 26. Number of HMOs (all types) with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

HMOs where ASB incidents occur are widespread throughout Brent, with a bias towards some of the eastern wards (Map 18).



Map 18. Number of HMOs (all types) with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

## 6.1.2 Additional HMOs

There were 206 Additional HMOs linked to ASB incidents in Brent (13.5%). Willesden Green (34) has the highest number of complaints (Figure 27).

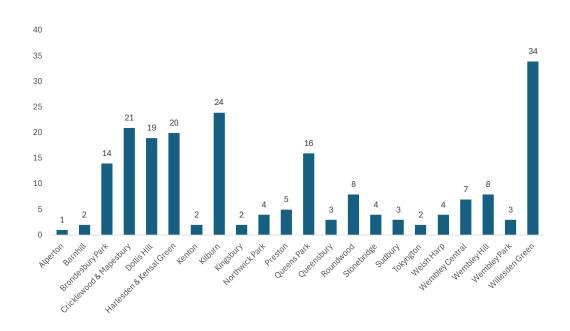
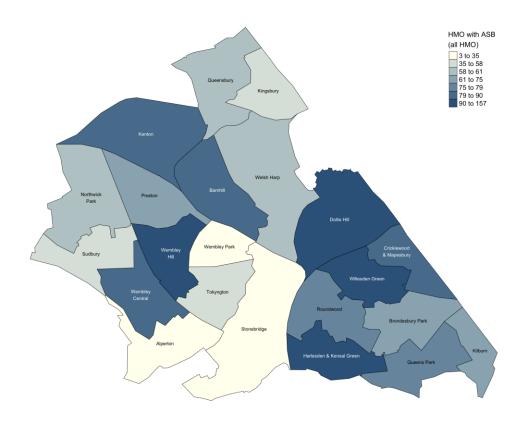


Figure 27. Number of Additional HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

ASB incidents linked to Additional HMOs are distributed across most of the borough, with hotspots in certain areas such as Dollis Hill, Wembley Hill, Willesden Green, and Harlesden & Kensal Green (Map 19).



Map 19. Distribution of ASB linked to Additional HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 6.1.3 Mandatory HMOs

There were 637 Mandatory HMOs linked to ASB incidents throughout Brent (41.8%). Willesden Green (82) and Dollis Hill (81) have the highest number of complaints (Figure 28).

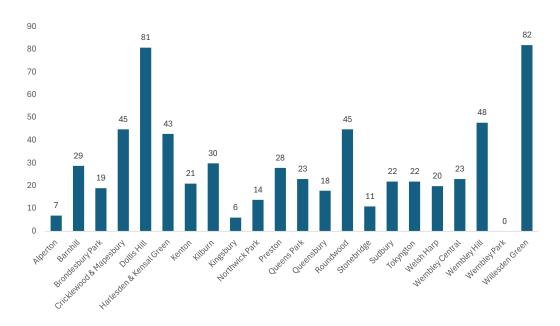
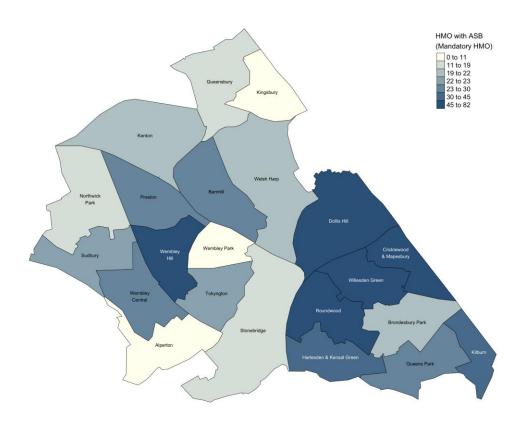


Figure 28. Number of Mandatory HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

Most wards have ASB linked to HMOs (Wembley Park is an exception) with eastern wards having higher concentrations (Map 20).



Map 20. Distribution of ASB linked to Mandatory HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## 6.1.4 Predicted/Hidden HMOs

There were 682 Predicted/hidden HMOs linked to ASB incidents (44.7%). Wembley Central has the highest number of (hidden) HMOs with ASB incidents (59), with Dollis Hill (57) and Kenton (56) not far behind (Figure 29).

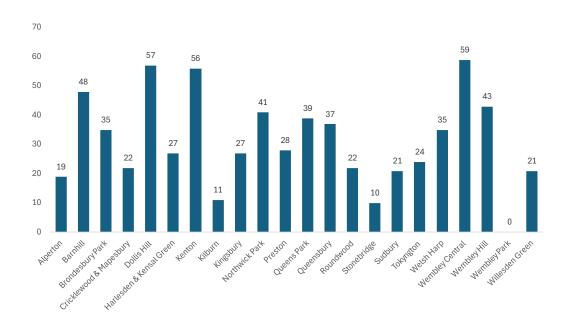
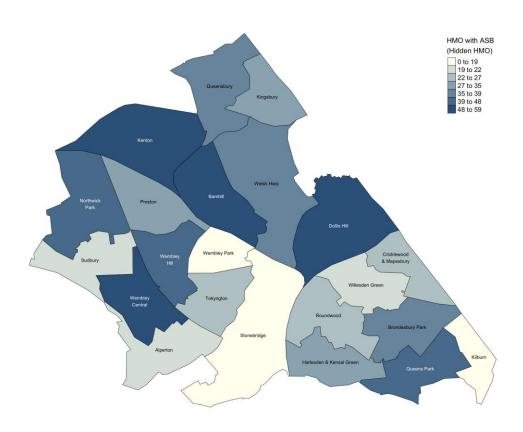


Figure 29. Number of Predicted/hidden HMOs with ASB incidents by ward (April 2019 – March 2024) (Source: Ti 2024).

All wards (except Wembley Park) have ASB linked to Predicted/hidden HMOs (Map 21). There is a slight bias towards the northern wards.



Map 21. Distribution of ASB linked to Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

#### 6.2 Total ASB incidents

The total number of ASB incidents includes properties where there were multiple incidents. As such the data show the levels of anti-social behaviour across the borough and at different kinds of HMO property.

#### 6.2.1 All HMOs

Overall, there were 2,366 ASB incidents linked to all HMOs. The most (229) were from Dollis Hill (Figure 30).

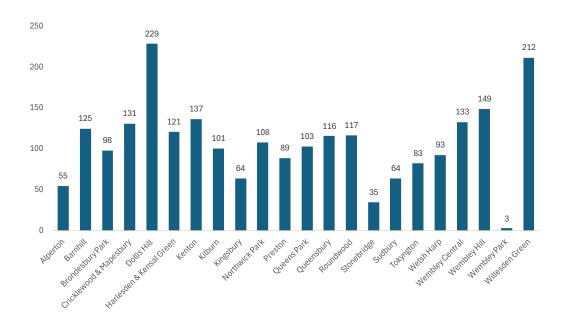
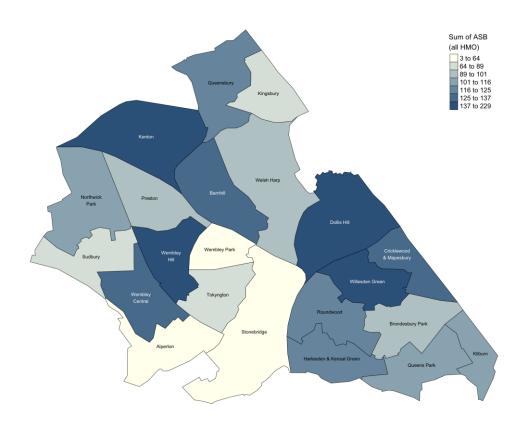


Figure 30. Total number of ASB incidents linked to All HMOs (April 2019 – March 2024) (Source: Ti 2024).

ASB incidents are widespread throughout Brent (Map 22). There are hot spots in the east (Dollis Hill, Willesden Green), north (Kenton), and Wembley Hill ward.



Map 22. Distribution of total number of ASB incidents linked to All HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 6.2.2 Additional HMOs

Of the total ASB incidents 274 (11.6%) were linked to Additional HMOs. Willesden Green had the highest (45) total number of ASB incidents (Figure 31).

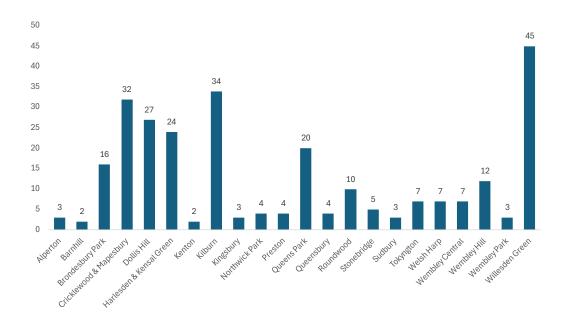
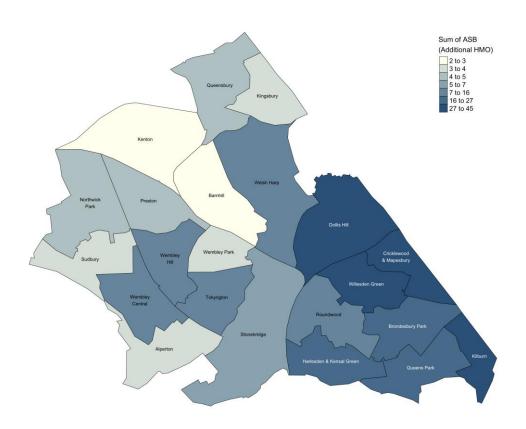


Figure 31. Total number of ASB incidents linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents in all Brent wards (Map 23). There is a slight bias towards the southeastern wards.



Map 23. Distribution of total number of ASB incidents linked to Additional HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 6.2.3 Mandatory HMOs

Of the total ASB incidents 966 (40.8%) were linked to Mandatory HMOs. Willesden Green had the highest (130) total number of ASB incidents (Figure 32).

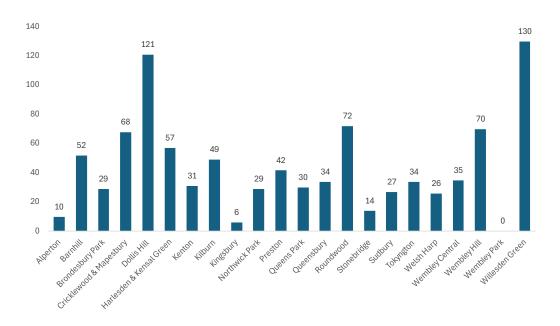
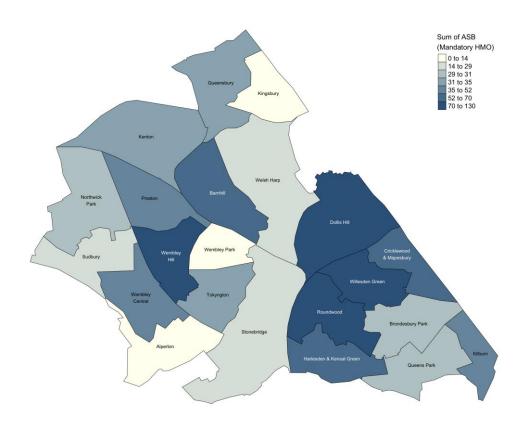


Figure 32. Total number of ASB incidents linked to Mandatory HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents linked to Mandatory HMOs in all wards except Wembley Park (Map 24). In general, there is a slight bias towards the eastern wards.



Map 24. Distribution of total number of ASB incidents linked to Mandatory HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

# 6.2.4 Predicted/hidden HMOs

Of the total ASB Predicted/hidden HMOs accounted for 1126 incidents (47.6%). Kenton ward had the highest total (104) incidents (Figure 33).

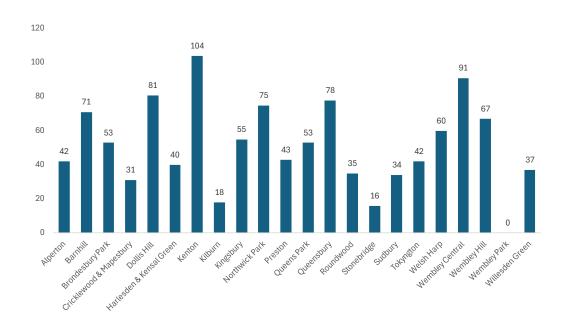
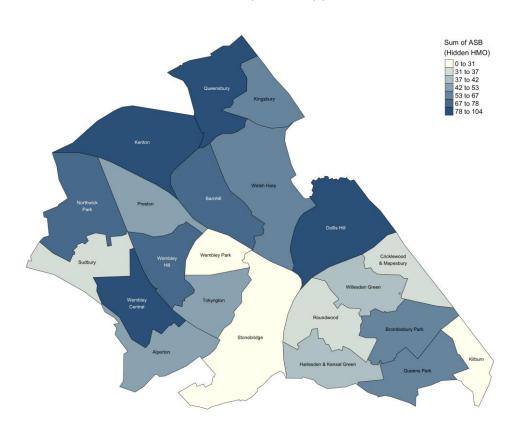


Figure 33. Total number of ASB incidents linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024).

There were ASB incidents linked to Predicted/hidden HMOs in all wards except Wembley Park (Map 25). ASB linked to Predicted/hidden HMOs seem particularly prevalent in the north.



Map 25. Distribution of total number of ASB incidents linked to Predicted/hidden HMOs (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## 6.3 Repeat ASB

Some properties are linked to multiple ASB incidents. Repeat ASB incidents (2 or more at same property) provide an indication of persistent anti-social behaviour linked to HMO properties.

#### 6.3.1 All HMOs

There were 518 HMOs (all types) with repeat ASB incidents. Dollis Hill (54), and Willesden Green (44) had the highest number of repeat ASB incidents (Figure 34).

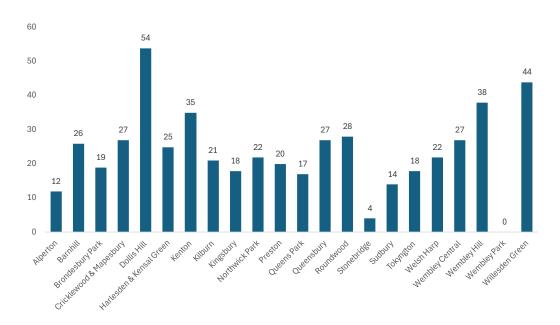
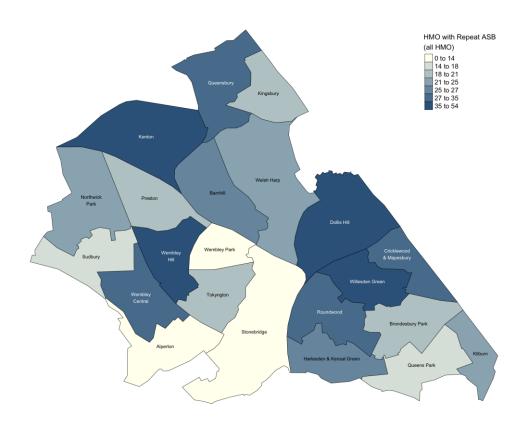


Figure 34. Number of HMOs (all types) with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Repeated ASB incidents at HMOs occurred across Brent, except for Wembley Park (Map 26). There are hotspots in the east, north, and at Wembley Hill ward.



Map 26. Number of All HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 6.3.2 Additional HMOs

There were 47 Additional HMOs with repeated ASB incidents (9.1%). Four wards contributed substantially to this total: Willesden Green, Cricklewood & Mapesbury, Dollis Hill, and Kilburn (Figure 35).

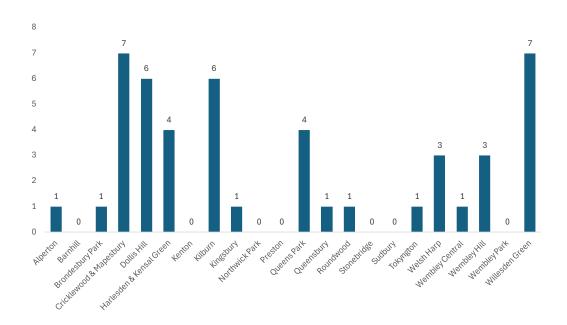
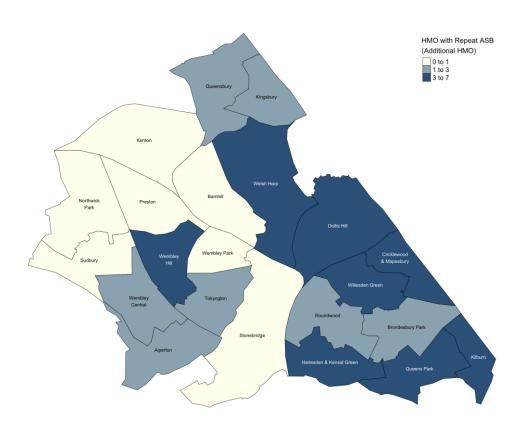


Figure 35. Number of Additional HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

The majority of the repeat ASB incidents linked to Additional HMOs are from the east and southeastern wards (Map 27).



Map 27. Number of Additional HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

### 6.3.3 Mandatory HMOs

There were 213 Mandatory HMOs with repeated ASB incidents (41.1%). Willesden Green (31), and Dollis Hill (29) were the highest (Figure 36).

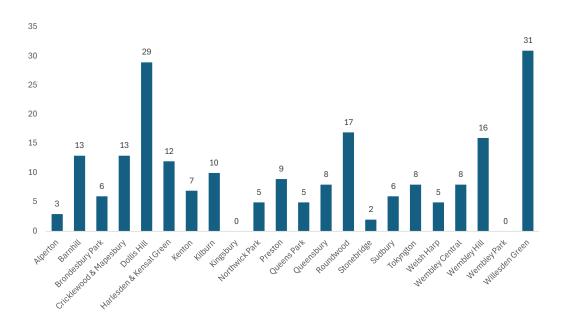
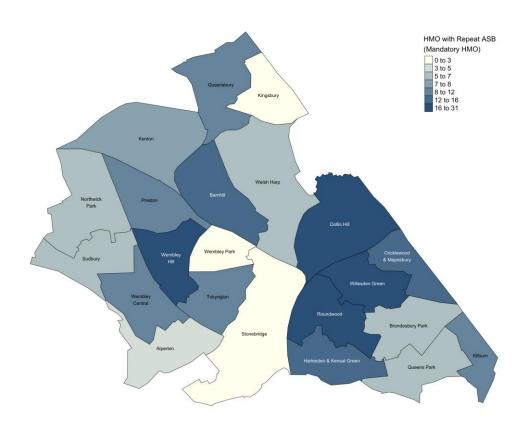


Figure 36. Number of Mandatory HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Repeat ASB incidents at Mandatory HMOs occurred throughout most of Brent (Map 28). There is a slight bias towards the eastern wards, but Wembley Hill is also notable.



Map 28. Number of Mandatory HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

# 6.3.4 Predicted/hidden HMOs

There were 258 Predicted/hidden HMOs linked to repeat ASB (49.8%). Kenton ward had the highest (28) number of Predicted/hidden HMOs with repeated ASB incidents (Figure 37).

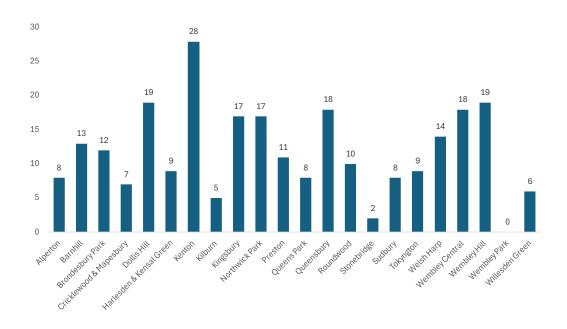
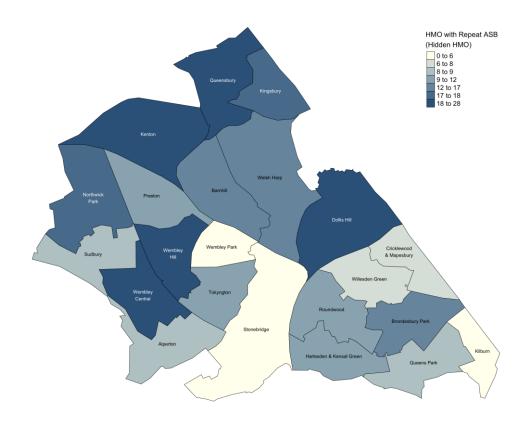


Figure 37. Number of Predicted/hidden HMOs with repeat ASB incidents (April 2019 – March 2024) (Source: Ti 2024).

Predicted/hidden HMO linked to repeat ASB incidents are widespread throughout Brent (Map 29). The distribution is uneven, with hotspots in the north (Queensbury, Kenton), west (Wembley Hill/Central), and east (Dollis Hill).



Map 29. Number of Predicted/hidden HMOs with repeated ASB incidents (April 2019 – March 2024) (Source: Ti 2024, Map by Metastreet).

## 6.4 Summary

The potential impact of hidden HMOs becomes most apparent when the proportions of the HMO types are compared to one another (Figure 38). Predicted/hidden HMOs account for about the same (45—50%) as Mandatory HMOs (41—42%, Figure 38). Additional HMOs account for much less (9—11%). Being able to identify hidden HMOs could be a helpful step in dealing with anti-social behaviour.

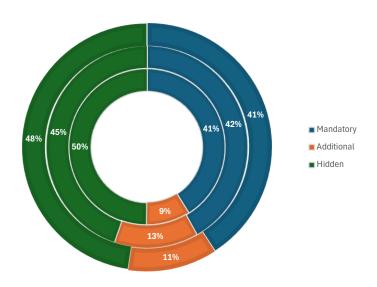


Figure 38. Relative proportions of HMO types in relation to ASB. Outer ring = HMO with ASB, Middle ring = Total ASB, Inner ring = HMO with Repeat ASB (April 2019 – March 2024) (Source: Ti 2024).

There are many types of anti-social behaviour, and council records provide insight into these. Of all the categories, the top 10 account for 95% of all recorded ASB incidents (Figure 39). Rowdy behaviour accounts for the vast majority of ASB incidents (72% of all ASB).

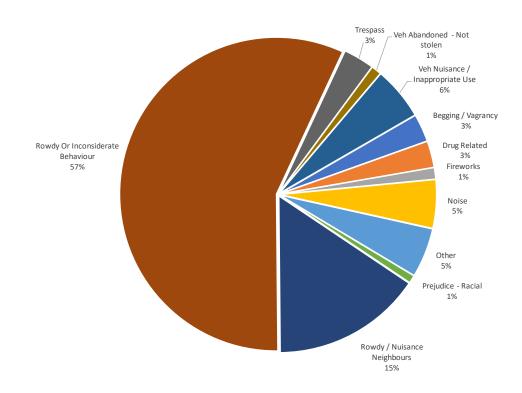


Figure 39. Categories for ASB incidents in Brent (April 2019 – March 2024) (Source Ti 2024).

## 7 Regulation and Enforcement

Brent Council uses a range of interventions to improve HMO standards, including enforcement and regulation. Enforcement includes using Housing Act and other public protection legislation to enforce standards and includes civil penalties and prosecutions.

Interventions can be a result of a complaint being made by a tenant about their accommodation or because of a proactive inspection. Regulation includes sector intervention using statutory housing and public health notices to address poor housing standards in the HMO sector. This includes notices to have HMOs repaired through to the prohibiting the use of some or all parts of a property.

#### 7.1 All HMOs

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 101 Civil Penalty Notices (CPN) to HMOs (known and hidden) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 40).

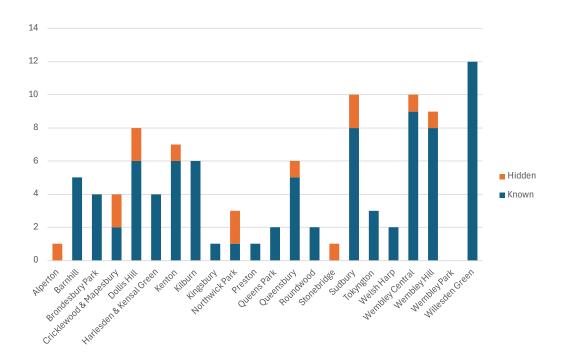
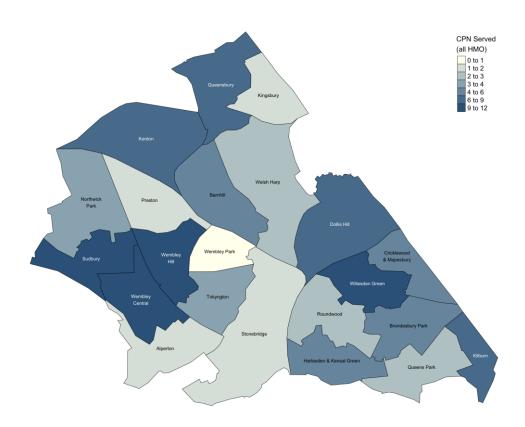


Figure 40. Regulation and enforcement interventions (CPN served) linked to All HMOs (known and hidden) by ward (April 2019 – March 2024) (Source Ti 2024).

CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 30).



Map 30. Distribution of regulation and enforcement interventions (CPN served) linked to All HMOs (known and hidden) April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

## 7.2 Known HMOs

It is most practical to look at Known HMOs (Additional and Mandatory) when considering CPNs.

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 41).

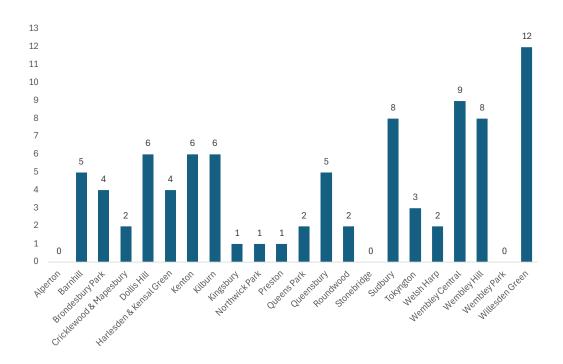
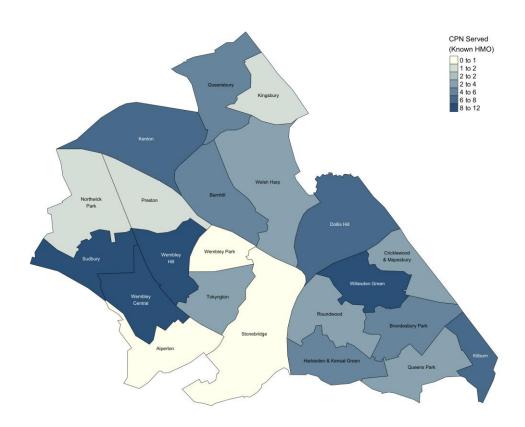


Figure 41. Regulation and enforcement interventions (CPN served) linked to Known HMOs (Additional and Mandatory) by ward (April 2019 – March 2024) (Source Ti 2024).

CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 31).



Map 31. Distribution of regulation and enforcement interventions (CPN served) linked to Known HMOs (Additional and Mandatory) April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

# 7.3 Predicted/hidden HMOs

Between April 2019 and March 2024, Brent Council used its regulatory powers to serve 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation (Figure 42).

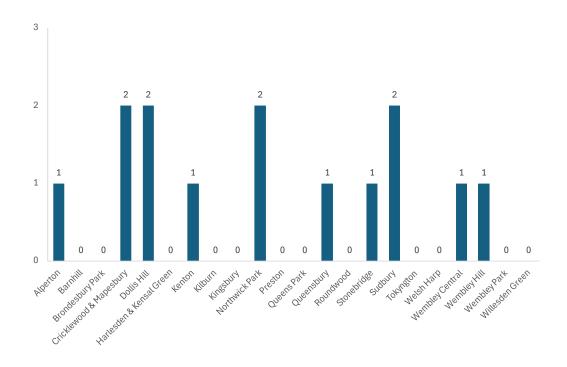
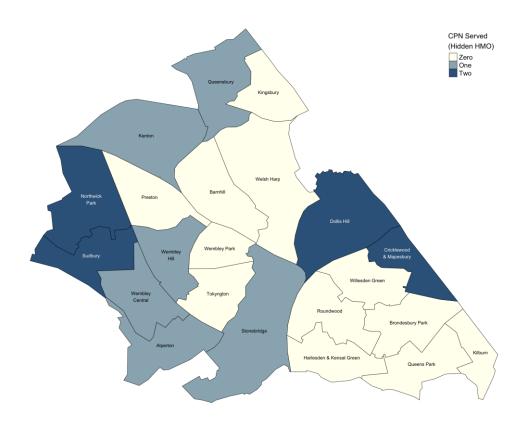


Figure 42. Regulation and enforcement interventions (CPN served) linked to Predicted/hidden HMOs by ward (April 2019 – March 2024) (Source Ti 2024).

CPNs were served across the borough of Brent, with hotspots in the west, and the east (Map 32).



Map 32. Distribution of regulation and enforcement interventions (CPN served) linked to Predicted/hidden HMOs April 2019 – March 2024 (Source Ti 2024, Map by Metastreet).

# 7.4 CPN Summary

Enforcement interventions, such as Civil Penalty Notices are seen as a last resort in the regulatory framework. The distribution between the HMO types is interesting (Figure 43).

Mandatory HMOs make up the largest proportion of CPNs served (73%), whilst Predicted/hidden HMOs account for 14%.

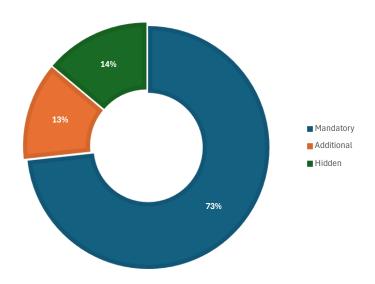


Figure 43. Proportions of CPN served to All HMOs (April 2019 – March 2024) (Source Ti 2024).

# 8 Summary

## 8.1 Population

The HMO population in Brent is made up of two main categories (described earlier); licenced HMOs (Additional and Mandatory) that share basic amenities (4,922); and Predicted/hidden HMOs that share basic amenities (2,209). The total HMO population in Brent is therefore calculated to be 7,131. The total HMO population is distributed across all wards. Wembley Park (931) has the most HMOs, whilst Alperton has the least (102) (Figure 2 & Map 2).

Additional HMOs are distributed across Brent (2,432). For this category, Wembley Park (923) has most HMOs, whilst Northwick Park (7) has the least (Figure 3 & Map 3). Mandatory HMOs are also widespread (2,490). Willesden Green ward has the highest number of Mandatory licences (339) (Figure 4 & Map 4). Predicted/hidden HMOs make up about one third of all HMOs (31%, 2,835). This group may either be exempt from licencing, unlicenced, or licenced as a single-family dwelling. It is not possible to identify from the data (where licensable) if the Predicted/hidden HMO properties would fall under Additional or Mandatory HMO requirements. Queens Park has the highest number of predicted hidden HMOs (202) (Figure 5 & Map 5).

Predicted/hidden (unlicensed) HMOs account for around one third (31%) of all HMOs across Brent (Figure 6). Northwick Park has the highest percentage of Predicted/hidden (therefore unlicensed) HMOs (73%).

The most common HMO property type in Brent are houses (70%), while bungalows are the least common property types (1%) (Figure 7).

# 8.2 Complaints

Brent recorded 902 HMO complaints (one or more) from tenants and others over a 5-year period (April 2019 – March 2024) across all HMO types (known and hidden).

There were 441 Mandatory HMOs linked to complaints by tenants and others to Brent Council. Dollis Hill (66) has the highest number of complaints (Figure 9).

There were 157 HMO Additional HMOs linked to complaints made by tenants and others to Brent Council (Figure 10). The highest number of complaints (21) were at Cricklewood and Mapesbury.

There were 304 Predicted/hidden HMOs linked to complaints made by tenants and others to the Council. Wembley Central (34) has the highest number of complaints (Figure 11).

Complaints are spread throughout the borough, with a slight bias towards the eastern wards (Map 6, Map 7,Map 8). However, when looking at Predicted/hidden HMOs the pattern becomes more divided, with concentrations of complaints predominantly from Wembley Central, Wembley Hill, Kenton, and Dollis Hill wards (Map 9).

For the period April 2019 – March 2024 there were 166 repeated complaints at All HMOs (known and hidden). Dollis Hill (23) had the highest number (Figure 12).

For the period April 2019 – March 2024 there were 84 repeated complaints at Mandatory HMOs. Dollis Hill (14) had the highest number (Figure 13).

For the period April 2019 – March 2024 there were 29 repeated complaints at Additional HMOs. Cricklewood & Mapesbury (6) had the highest number (Figure 14).

For the period April 2019 – March 2024 there were 53 repeated complaints at Predicted/hidden HMOs. Wembley Central (6) and Dollis Hill (6) had the highest number (Figure 15).

Overall, there were 902 complaints, and 166 repeated complaints. Mandatory HMOs had the most (441 & 81), with Predicted/hidden HMOs not far behind (304, 53) (Figure 16).

Although the absolute numbers of complaints and repeat complaints varied between HMO types (Figure 16), the proportion of all complaints that were repeated was remarkably consistent (around 18%, Figure 17).

## 8.3 Hazards

There are 1,955 HMOs (known and Predicted/hidden) properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Dollis Hill (191) has the greatest number, whilst Wembley Park (3) has the fewest (Figure 18, Map 14). This represents 27% of the known and Predicted/hidden HMO population, more than double the PRS national average (12%)<sup>8</sup>. Properties with serious hazards are distributed throughout Brent but there is a slight bias towards eastern wards (Map 14).

There are 255 Additional HMOs properties in Brent that are likely to have at least 1 serious housing hazard (Category 1 and/or high scoring Category 2 hazards, HHSRS). Willesden Green (50) has the highest number of predicted hazards, whilst Alperton (1) has the lowest (Figure 19, Map 15).

<sup>&</sup>lt;sup>8</sup> EHS Headline 2022-2023, https://www.gov.uk/government/statistics/chapters-for-english-housing-survey-2022-to-2023-headline-report

Although Additional HMOs with serious hazards are widespread there is a slight bias towards the eastern wards (Map 15).

Mandatory HMOs with serious hazards (784) are distributed across the whole borough (Figure 20, Map 16). New Willesden Green (98) and Dollis Hill (97) have the highest number of predicted hazards. Although Mandatory HMOs with serious hazards are widespread there is a slight bias towards the eastern wards (Map 16).

Predicted/hidden HMOs with serious hazards (916) are distributed across the whole borough. Kenton (79) and Dollis Hill (74) wards have the highest number of Predicted/hidden HMOs with predicted serious hazards (Figure 21). Predicted/hidden HMO properties with serious hazards can be found throughout Brent, with hot spots in Queens Park, Dollis Hill, Kenton, Barnhill, and Wembley Central (Map 17).

## 8.4 EPC rating

As part of this study, 3,620 EPC ratings were matched to known HMO properties (Figure 22). All figures have been modelled from this group. The housing stock is dominated by EPC ratings C & D (78%), with B & E ratings less so (21%). The A, F & G ratings are the least common (Figure 23).

Brent has 458 HMO EPC records that are E, F, & G rated (Figure 25). EPC ratings E, F, & G represent properties with the least energy efficiency. Willesden Green (76) and Cricklewood & Mapesbury (49) have the highest number of EPC ratings E-G (Figure 25). It has been calculated using the matched addresses that 1.1% (102) of HMO properties (known and Predicted/hidden) in Brent have F and G rating.

## 8.5 Anti-social behaviour

Across Brent 1,525 HMO properties (all types) have recorded ASB incidents. Dollis Hill (157) has the highest number of HMOs with ASB incidents (Figure 26). HMOs where ASB incidents occur are widespread throughout Brent, with a bias towards some of the eastern wards (Map 18).

There were 206 Additional HMOs linked to ASB incidents in Brent (13.5%). Willesden Green (34) has the highest number of complaints (Figure 27). ASB incidents linked to Additional HMOs are distributed across most of the borough, with hotspots in certain areas such as Dollis Hill, Wembley Hill, Willesden Green, and Harlesden & Kensal Green (Map 19).

There were 637 Mandatory HMOs linked to ASB incidents throughout Brent (41.8%). Willesden Green (82) and Dollis Hill (81) have the highest number of complaints (Figure 28). Most wards have

ASB linked to HMOs (Wembley Park is an exception) with eastern wards having higher concentrations (Map 20).

There were 682 Predicted/hidden HMOs linked to ASB incidents (44.7%). Wembley Central has the highest number of (hidden) HMOs with ASB incidents (59), with Dollis Hill (57) and Kenton (56) not far behind (Figure 29). All wards (except Wembley Park) have ASB linked to Predicted/hidden HMOs (Map 21). There is a slight bias towards the northern wards.

Overall, there were 2,366 ASB incidents linked to all HMOs. The most (229) were from Dollis Hill (Figure 30). ASB incidents are widespread throughout Brent (Map 22). There are hot spots in the east (Dollis Hill, Willesden Green), north (Kenton), and Wembley Hill ward.

Of the total ASB incidents 274 (11.6%) were linked to Additional HMOs. Willesden Green had the highest (45) total number of ASB incidents (Figure 31). There were ASB incidents in all Brent wards (Map 23). There is a slight bias towards the southeastern wards.

Of the total ASB incidents 966 (40.8%) were linked to Mandatory HMOs. Willesden Green had the highest (130) total number of ASB incidents (Figure 32). There were ASB incidents linked to Mandatory HMOs in all wards except Wembley Park (Map 24). In general, there is a slight bias towards the eastern wards.

Of the total ASB Predicted/hidden HMOs accounted for 1126 incidents (47.6%). Kenton ward had the highest total (104) incidents (Figure 33). There were ASB incidents linked to Predicted/hidden HMOs in all wards except Wembley Park (Map 25). ASB linked to Predicted/hidden HMOs seem particularly prevalent in the north.

There were 518 HMOs (all types) with repeat ASB incidents. Dollis Hill (54), and Willesden Green (44) had the highest number of repeat ASB incidents (Figure 34). Repeated ASB incidents at HMOs occurred across Brent, except for Wembley Park (Map 26). There are hotspots in the east, north, and at Wembley Hill ward.

There were 47 Additional HMOs with repeated ASB incidents (9.1%). Four wards contributed substantially to this total: Willesden Green, Cricklewood & Mapesbury, Dollis Hill, and Kilburn (Figure 35). The majority of the repeat ASB incidents linked to Additional HMOs are from the east and southeastern wards (Map 27).

There were 213 Mandatory HMOs with repeated ASB incidents (41.1%). Willesden Green (31), and Dollis Hill (29) were the highest (Figure 36). Repeat ASB incidents at Mandatory HMOs occurred

throughout most of Brent (Map 28). There is a slight bias towards the eastern wards, but Wembley Hill is also notable.

There were 258 Predicted/hidden HMOs linked to repeat ASB (49.8%). Kenton ward had the highest (28) number of Predicted/hidden HMOs with repeated ASB incidents (Figure 37). Predicted/hidden HMO linked to repeat ASB incidents are widespread throughout Brent (Map 29). The distribution is uneven, with hotspots in the north (Queensbury, Kenton), west (Wembley Hill/Central), and east (Dollis Hill).

Predicted/hidden HMOs account for about the same (45—50%) as Mandatory HMOs (41—42%) for all recorded ASB (Figure 38). Additional HMOs account for much less (9—11%). Being able to identify hidden HMOs could be a helpful step in dealing with anti-social behaviour.

There are many types of anti-social behaviour, and council records provide insight into these. Of all the categories, the top 10 account for 95% of all recorded ASB incidents (Figure 39). Rowdy behaviour accounts for the vast majority of ASB incidents (72% of all ASB). Note that these figures are all ASB incidents and not necessarily those linked to HMOs.

## 8.6 Civil Penalty Notices

Between April 2019 and March 2024, Brent Council served 101 Civil Penalty Notices (CPN) to HMOs (known and hidden) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 40).

Between April 2019 and March 2024, Brent Council served 87 Civil Penalty Notices (CPN) to Known HMOs (Additional and Mandatory) under housing and public protection legislation. Willesden Green had the greatest number of CPN served (12) during this period (Figure 41). CPNs were served throughout the borough of Brent, with hotspots in the west, and in Willesden Green (Map 31).

Between April 2019 and March 2024, Brent Council served 14 Civil Penalty Notices (CPN) to Predicted/hidden HMOs under housing and public protection legislation (Figure 42). CPNs were served across the borough of Brent, with hotspots in the west, and the east (Map 32).

# Appendix 1 – Ward summaries

The ward summaries show the data used to create the summary graphs and maps for the 22 wards in the borough of Brent.

Table 1. HMO overview (known HMOs, Additional) (Source Ti 2024).

Ward	HMOs	HMO complaints	Repeat complaints (2 or more incidents)	HMOs with hazards (1 or more)	HMOs with ASB (1 or more incidents)	Sum of HMO ASB incidents	Repeat ASB (2 or more incidents)	CPN served
Alperton	17	1	0	1	1	3	1	0
Barnhill	9	2	0	2	2	2	0	0
Brondesbury Park	133	11	1	16	14	16	1	0
Cricklewood & Mapesbury	150	21	6	30	21	32	7	1
Dollis Hill	85	12	3	20	19	27	6	1
Harlesden & Kensal Green	167	18	3	26	20	24	4	0
Kenton	23	5	1	4	2	2	0	2
Kilburn	165	18	3	24	24	34	6	2
Kingsbury	10	5	1	2	2	3	1	1
Northwick Park	7	0	0	4	4	4	0	0
Preston	18	3	0	4	5	4	0	0
Queens Park	166	7	0	21	16	20	4	0
Queensbury	13	2	0	4	3	4	1	0
Roundwood	74	9	2	12	8	10	1	0
Stonebridge	54	1	0	5	4	5	0	0
Sudbury	20	1	0	3	3	3	0	3
Tokyngton	21	4	1	3	2	7	1	0
Welsh Harp	23	2	0	4	4	7	3	0
Wembley Central	34	7	2	7	7	7	1	2
Wembley Hill	83	10	4	10	8	12	3	0
Wembley Park	923	1	0	3	3	3	0	0
Willesden Green	237	17	2	50	34	45	7	1
Total	2432	157	29	255	206	274	47	13

Table 2. HMO overview (known HMOs, Mandatory) (Source Ti 2024).

Alperton 36 Barnhill 74 Brondesbury Park 90 Cricklewood & Mapesbury 198 Dollis Hill 292 Harlesden & Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	26	5	8	_			
Brondesbury Park 90 Cricklewood & Mapesbury 198 Dollis Hill 294 Harlesden & Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118		5		7	10	3	0
Park 90 Cricklewood & Mapesbury 198 Dollis Hill 294 Harlesden & Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	14		32	29	52	13	5
& Mapesbury 198 Dollis Hill 294 Harlesden & 178 Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118		2	22	19	29	6	4
Harlesden & Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	32	6	61	45	68	13	1
Kensal Green 178 Kenton 85 Kilburn 128 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	66	14	97	81	121	29	5
Kilburn 125 Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	3 33	9	53	43	57	12	4
Kingsbury 33 Northwick Park 43 Preston 77 Queens Park 118	12	1	27	21	31	7	4
Northwick Park 43 Preston 77 Queens Park 118	5 16	6	33	30	49	10	4
Park 43 Preston 77 Queens Park 118	0	0	8	6	6	0	0
Preston 77 Queens Park 118	4.5	_	4.0			_	
Queens Park 118		3	18	14	29	5	1
		2	33	28	42	9	1
		2	21	23	30	5	2
Queensbury 67		0	21	18	34	8	5
Roundwood 168		5	59	45	72	17	2
Stonebridge 72	9	2	23	11	14	2	0
Sudbury 81	13	2	27	22	27	6	5
Tokyngton 83	24	4	29	22	34	8	3
Welsh Harp 92	13	2	27	20	26	5	2
Wembley				_		_	
Central 76		2	28	23	35	8	7
Wembley Hill 153	32	6	59	48	70	16	8
Wembley							
Park 8	0	0	0	0	0	0	0
Willesden Green 339	47	11	98	82	130	31	11
Total 249		84	784	637	966	213	74

Table 3. HMO overview (Predicted/hidden HMOs) (Source Ti 2024).

Ward	HMOs	НМО	Repeat	HMOs	HMOs	Sum of	Repeat	CPN
		complaints	complaints	with	with ASB	HMO	ASB (2 or	served
			(2 or more	hazards	(1 or	ASB	more	
			incidents)	(1 or	more	incidents	incidents)	
Alperton	49	9	1	more) 23	incidents) 19	42	8	1
Barnhill	120	17	5	62	48	71	13	0
Brondesbury Park	126	15	3	54	35	53	12	0
Cricklewood	98	7	1	43	22	31	7	2
& Mapesbury								
Dollis Hill	168	27	6	74	57	81	19	2
Harlesden & Kensal Green	114	16	4	43	27	40	9	0
Kenton	188	31	5	79	56	104	28	1
Kilburn	49	4	1	23	11	18	5	0
Kingsbury	67	4	0	29	27	55	17	0
Northwick Park	133	11	1	56	41	75	17	2
Preston	84	15	2	34	28	43	11	0
Queens Park	202	17	2	62	39	53	8	0
Queensbury	99	14	3	44	37	78	18	1
Roundwood	59	6	0	23	22	35	10	0
Stonebridge	28	9	3	9	10	16	2	1
Sudbury	71	12	2	25	21	34	8	2
Tokyngton	58	10	2	28	24	42	9	0
Welsh Harp	113	11	0	48	35	60	14	0
Wembley	156	34	6	72	59	91	18	1
Central								
Wembley Hill	129	23	5	46	43	67	19	1
Wembley	0	0	0	0	0	0	0	0
Park								
Willesden Green	98	12	1	39	21	37	6	0
Total	2209	304	53	916	682	1126	258	14

# Appendix 2 – Tenure Intelligence (Ti) – stock modelling methodology

This Appendix explains at a summary level Metastreet's Tenure Intelligence (Ti) methodology (Figure 44).

Ti uses big data and machine learning in combination with expert housing knowledge to accurately define outcome at the property level.

Council and external data have been assembled as set out in Metastreet's data specification to create a property data warehouse comprising millions of cells of data.

Where necessary, machine learning is used to make predictions of defined outcomes for each residential property, using known outcome data provided by the council.

Results are analysed by skilled practitioners to produce a summary of housing stock, predictions of levels of property hazards and other property stressors. The results of the analysis can be found in the report findings chapter.

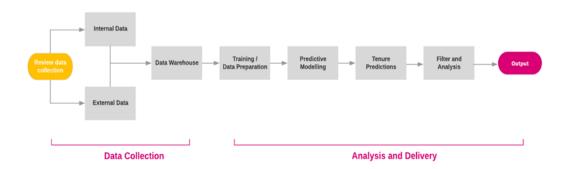


Figure 44. Summary of Metastreet Tenure Intelligence methodology.

## Methodology

Metastreet has worked with Brent to create a residential property data warehouse based on a detailed specification. All longitudinal council held data is 5 consecutive years, from April 2019 – March 2024 unless otherwise specified.

Once the property data warehouse was created, the Ti model was used to predict tenure and stock condition using the methodology outlined below.

Machine learning was utilised to develop predictive models using training data provided by the council. Predictive models were tested against all residential properties to calculate risk scores for each outcome. Scores were integrated back into the property data warehouse for analysis.

Many combinations of risk factors were systematically analysed for their predictive power using logistic regression. Risk factors that duplicated other risk factors but were weaker in their predictive effect were eliminated. Risk factors with low data volume or higher error are also eliminated. Risk factors that were not statistically significant are excluded through the same processes of elimination. The top 5 risk factors for each model have the strongest predictive combination.

Using a  $D^2$  constant calculation it is possible to measure the theoretical quality of the model fit to the training data sample. This calculation has been completed for each model. The  $D^2$  is a measure of "predictive capacity", with higher values indicating a better model.

Based on the modelling each residential property is allocated a probability score between 0-1. A probability score of 0 indicates a strong likelihood that the property tenure type is *not* present, whilst a score of 1 indicates a strong likelihood the tenure type *is* present.

Predictive scores are used in combination to sort, organise and allocate each property to one of 4 categories described above. Practitioner skill and experience with the data and subject matter is used to achieve the most accurate tenure split.

It is important to note that this approach cannot be 100% accurate as all mathematical models include error for a range of reasons. The  $D^2$  value is one measure of model "effectiveness". The true test of predictions is field trials by the private housing service. However, error is kept to a minimum through detailed post analysis filtering and checking to keep errors to a minimum.

A continuous process of field testing and model development is the most effective way to develop accurate tenure predictions.

The following tables include detail of each selected risk factors for each model. Results of the null hypothesis test are also presented as shown by the Pr(>Chi) results. Values of <0.05 are generally considered to be statistically significant. All the models show values much smaller, indicating much stronger significance.

#### Serious hazards (HHSRS) model

Numerous properties where the local housing authority has recently taken action to address serious hazards were sampled for training data. Specifically, this included Housing Act 2004 Notices served

on properties to address serious hazards. The model results show that each of the model terms is statistically significant, with the overall model having a "predictive capacity" of around 94% (Table 4).

Table 4. Serious hazard (HHSRS) predictive factors.

Risk factors selected	<u>Pr (&gt;Chi)</u> *
CURRENT_ENERGY_EFFICIENCY	2.2e-16
ASB.all.types	2.2e-16
PRS.intervention	2.2e-16
Planning_enforcement	3.272e-06
Bens.number	1.708e-08
Training data, n= 417	
$D^2$ test = 0.94	

# **HMO** predictive model

The HMO model shows that each of the 5 model terms is statistically significant, with the overall model having a "predictive capacity" of around 68% (Table 5).

Table 5. HMO predictive factors.

Risk factors selected	Pr(>Chi)
ASB.all.types	1.530e-15
NUMBER_HABITABLE_ROOMS	2.2e-16
TOTAL_FLOOR_AREA	2.2e-16
Electors_Removed_Since_2018	2.2e-16
Planning_enforcement	2.2e-16
Training data, n= 1133	
$D^2$ test = 0.68	

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