

ROGUE LANDLORDS IN LONDON:

A survey of local
authority enforcement
in the private rented
sector

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*October
2016*

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Introduction



Over the last decade London's private rented sector has more than doubled in size to become the second largest housing tenure in the capital (see figure1).

There are now almost 1 million private rented sector properties in London housing over 2 million people – around a third of the population.

For many people, living in the private rented sector works well - with short-term tenancy agreements offering them the flexibility they need to move homes quickly for new jobs or career opportunities.

For many others, however, the sector has become a tenure of last resort rather than a destination of choice.

With soaring house price inflation putting home ownership beyond an increasing number of middle-income households, a growing number of families have been left with no choice but to stay in the private rented sector.

At the same time changes to the law giving local councils more scope to place homeless households in private rented homes, combined with a desperate shortage of social rented homes, have left many low-income and vulnerable households living in the private rented sector.

Despite a huge change in the number and profile of private renters, conditions in the sector remain highly variable, with around a third of homes failing to meet the Government's Decent Homes standard.

As this survey shows, the enforcement of standards in the private rental sector by local authorities remains highly variable too – with recent cuts to local authority budgets diminishing the resources available to councils to tackle those landlords who provide poor or unsafe living conditions.

The resulting patchwork of enforcement has left thousands of Londoners at the mercy of rogue landlords.

Much of the problem lies with the lack of effective regulation in the sector and the current system of management, with the majority of properties owned by individual landlords renting just one or two properties.

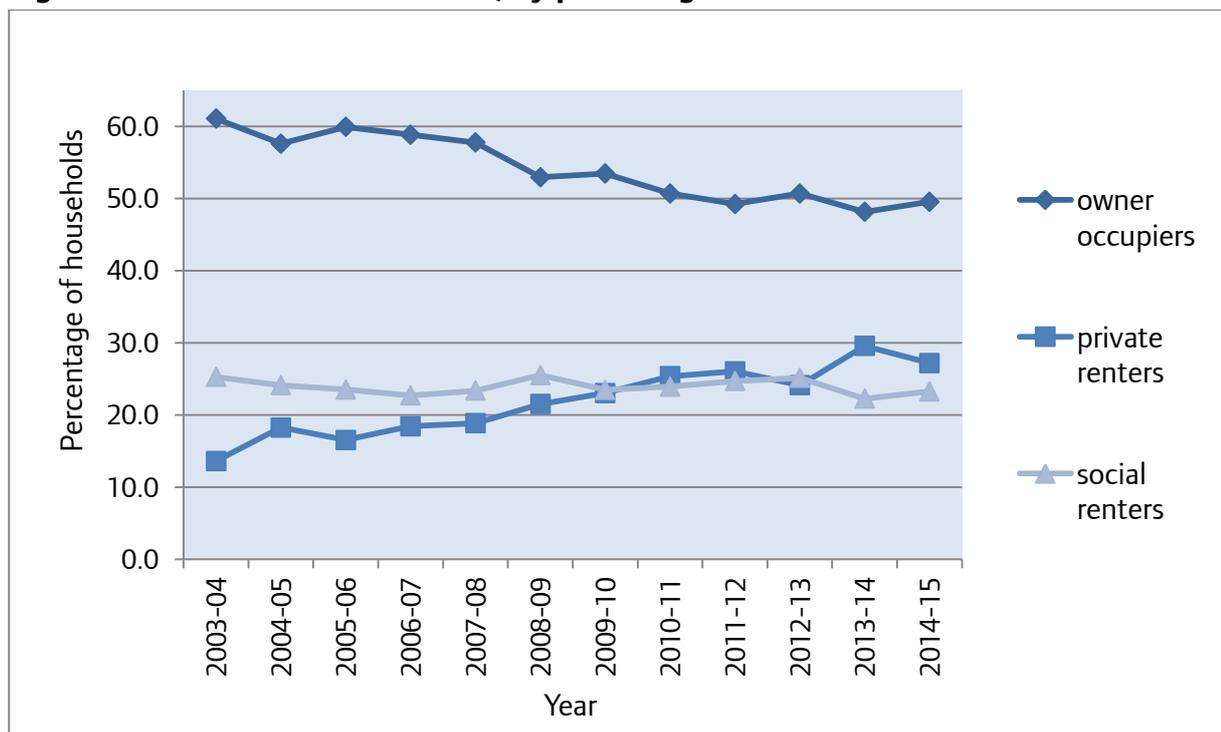
This approach may have met the needs of tenants in years gone by, but as the number and profile of households living in the private rented sector has changed, so too have the expectations of those renting privately.

If the sector is to lose its reputation as the property industry’s “Wild West”, it is clear that a proper framework of regulation and enforcement is required.

From the results of this survey I am pleased to make a number of recommendations as to how the sector could be reformed to meet the needs of modern renters, with healthier and safer standards for all, creating a tenure fit for the 21st century.

Caroline Pidgeon MBE AM
Londonwide Member of the London Assembly

Figure 1: Tenure trends in London, by percentage of households¹



Source: DCLG, English Housing Survey.

What's the problem?

Despite huge changes in the demographics of the private rented sector in recent years – with an increasing number of families, low-income and vulnerable households living in the sector – conditions remain poor: a third of homes fail to meet the Government's Decent Homes standard, with over 60 per cent of renters having experienced either damp, mould, leaking roofs or windows, electrical hazards, animal infestation or gas leaks according to a recent survey commissioned by the housing charity Shelter.²

While the exact number of rogue landlords operating in the sector remains unknown, there is a growing sense that the problem is getting worse as demand for housing (and the profits that can be made from renting out substandard accommodation) continues to increase, with one in 20 renters saying they have rented from a rogue landlord in the past twelve months.³

Families at mercy of rogue landlords

The Times, 17 October 2015

Local councils guilty of 'softly, softly approach' to rogue landlords

Research shows that authorities received 51,916 complaints about poor living conditions but inspected just 14,043 homes.....

The Guardian, 18 January 2016

Rogue landlord rented out squalid house that even had a TREE poking through the wall for £40,000 a year

- **Officials reclaiming the property visited it this week to discover a huge branch poking through one of the rooms**

Daily Mail, 29 November 2014

Rogue landlords have little to fear from 'cash-strapped' councils

The Guardian, 26 August 2015

Rogue landlords' squalid homes revealed by Newham Council

The squalid homes which rogue landlords are renting out have been revealed as part of a London council's crackdown. Newham Council says it has become the first to introduce compulsory licensing of landlords.

BBC News Website, 16 December 2013

Raids on landlords in east London uncover families in 'pest-ridden Victorian slums'

Newham Council has prosecuted more than 500 landlords since it became the first local authority in Britain to launch a licensing scheme for people renting out properties....

London Evening Standard, 19 November 2015

Rogue landlord converted single north London house into NINE flats... and raked in £100k rent a year

London Evening Standard, 15 November 2015

What's the Mayor doing?

Sadiq Khan's manifesto included a number of measures to improve conditions in the private rented sector, including:

- Setting up a London-wide not-for-profit lettings agency for good landlords, building on the work that councils have started, and ending rip-off fees for renters.
- Working alongside boroughs to promote landlord licensing schemes to drive up standards, and make the case to government for London-wide landlord licensing.
- Name and shame rogue landlords and ensure tenants have access to this information online.⁴

Since becoming Mayor, Sadiq Khan has continued to highlight the poor living conditions experienced by some private renters and repeated his intention to "get a grip on the private rented sector".⁵

Appearing before the London Assembly on 19 October 2016, the Mayor signalled his support for local authorities wishing to "crack down on bad landlords through properly enforced landlord licensing schemes", citing his letter in support of Redbridge Council's application to the Secretary of State for Communities and Local Government to implement a selective licensing scheme to protect private tenants.⁶

Although detailed proposals are yet to be published, it will be important for the Mayor's proposals to support the existing work and enforcement activity carried out by London boroughs.

The available evidence suggests that in those boroughs where borough-wide selective licensing schemes are in place, much more rigorous enforcement takes place. If the Mayor is to realise his ambition to improve conditions across the private rented sector, it will be important that these existing schemes are retained as and when they come up for renewal.

What's the Housing Health and Safety Rating System?

The Housing Health and Safety Rating System (HHSRS) allows local authorities to assess housing conditions in private rented sector properties. The system focuses on identifying potential risks and hazards to health and safety arising from any deficiencies identified in dwellings.⁷

Where deficiencies are identified, local authorities have a range of powers at their disposal to force owners and landlords to put matters right. The system was introduced under the [Housing Act 2004](#) and applies to residential properties in England and Wales.

How does the Housing Health and Safety Rating System work in practice?⁸

A local authority officer will inspect a property looking for any risk of harm to occupiers. The installations looked at during an inspection include:

- **Water, Gas and Electricity.** These items must have whatever is needed for their proper use. All equipment necessary to supply these utilities must be fully, safely and correctly installed.
- **Personal Hygiene.** This covers installations such as hand basins, showers and/or baths.
- **Sanitation and drainage.** This covers lavatories, WC basins, drains, waste pipes, rainwater goods, inlet gullies and inspection chambers.
- **Food safety.** This covers sinks, draining boards, worktops, cooking facilities, cupboards and/or shelves for storing food, cooking and eating utensils.
- **Ventilation.** This covers elements such as airbricks, trickle vents, opening lights to windows and mechanical and non-mechanical ventilation equipment.
- **Space and water heating installations.** This covers any kind of fitted space heating appliance, central heating system or water system for providing hot water. Moveable heaters, kettles and other appliances of that kind are not included.

Once the inspection is complete the officer calculates a score - using a formal scoring system – to show the seriousness of any hazards found during their visit.

A system of bands (A-J) allows the severity of different hazards to be compared, for example damp and mould against carbon monoxide. The bands range from A (scores of 5,000 or more), which is the most dangerous and life threatening, down to J (scores of nine or less), the least serious.

If an officer finds a serious hazard (i.e. one in the higher scoring bands A – C, known as a ‘Category 1’ hazard) the local authority has a duty to take the most appropriate course of action from a range of measures prescribed in the HHSRS Enforcement Guidance.⁹ These include:

- **servicing an Improvement Notice.** This is a possible course of action for dealing with Category 1 or 2 hazards and must at the very least remove any Category 1 hazards. Once the necessary work has been done, the authority must revoke the notice. Failure to carry out the required works in the Improvement Notice within the specified timeframe is a criminal offence.
- **making a Prohibition Order.** This can prohibit the use of part or all of the premises, for example where conditions are a serious threat to health and/or safety but practical repairs are not possible because of cost or other reasons.
- **servicing a Hazard Awareness Notice.** This option is in the nature of advisory action where the authority wants to draw attention to the need for improvements. It could be a possible, though unusual, response to a Category 1 hazard. The notice must give details of the hazard concerned and what action is needed to deal with it.
- **taking emergency remedial action.** Where there is a Category 1 hazard and the local authority is satisfied that the hazard involves an imminent risk of serious harm to the health or safety of occupiers, the local authority can use emergency measures to get work done or prohibit the use of the dwelling in order to protect its occupiers. Using its powers the authority can carry out immediate remedial action, and though it is possible to appeal, in practice, any appeal is likely to be heard after any action has been taken.

As the name suggests, Category 2 hazards (i.e. those in scoring bands D - J) are not considered as serious as Category 1 hazards. However it is still possible for councils to force landlords to take action to address these less severe hazards if they believe it is necessary, although the usual approach would be to encourage landlords to secure improvements to their property voluntarily before issuing any formal notice.

Local authorities have the power to make a reasonable charge as a means of recovering certain expenses incurred in taking enforcement action. There is no statutory limit but the charge needs to be reasonable.

What's Selective Licensing?

Under the Housing Act (2004) local authorities have the power to introduce a system of mandatory licensing for privately rented homes, known as 'selective licensing'.¹⁰

In order to bring in a selective licensing scheme a local authority must show that in addition to having a high proportion of property in the private rented sector the area is experiencing either low housing demand; a significant and persistent problem caused by anti-social behaviour; poor property conditions; high levels of migration; high level of deprivation; or high levels of crime.¹¹

Landlords who rent out properties in an area that is subject to selective licensing are required to obtain a licence from the local authority for each of their properties.

Recent changes

Part 3 of the Housing Act (2004) sets out the scheme for licensing private rented properties in a local housing authority area. Under section 80 of the Act, a local housing authority can designate the whole or any part of its area as subject to selective licensing.¹²

Following Government criticism of borough-wide licensing schemes (citing increased regulatory burden and costs for reputable landlords) new regulations came into effect from 1 April 2015 which require a local authority to apply to the Secretary of State for Communities and Local Government for specific approval of any scheme that would cover more than 20 per cent of their geographical area or that would affect more than 20 per cent of privately rented homes in the local authority area.^{13,14} While pre-existing licensing schemes were not affected by this change, it remains unclear whether current borough-wide schemes will be approved by the Secretary of State when local authorities apply to renew them.

Selective Licensing Schemes in London

As of October 2016, eight London boroughs had introduced selective licensing schemes – Barking and Dagenham, Brent, Croydon, Harrow, Newham, Southwark, Tower Hamlets, and Waltham Forest. Of these, four schemes operate borough-wide, with the remaining five schemes applying to selected wards or properties. However, following recent government changes it is unlikely that any new schemes will apply to an entire local authority area.

Ealing Council has already agreed to introduce a selective licensing scheme covering five wards (due to come into force on 1 January 2017) and Redbridge Council is currently consulting on two selective licensing scheme proposals, one covering two wards and the other covering an additional 12 wards.¹⁵ In addition, Brent Council is currently consulting on options to extend selective licensing to all or some of its other wards.¹⁶ A number of other boroughs are also actively considering introducing similar schemes.¹⁷

Figure 2: Selective Licensing Schemes in London

Borough	Area covered	Date of introduction	Date of expiry
Barking and Dagenham	borough-wide	1 September 2014	31 August 2019
Brent	<20 % of the local authority area (3 Wards)	1 January 2015	31 December 2019
Croydon	borough-wide	1 October 2015	30 September 2020
Ealing	<20 % of the local authority area (5 Wards)	*1 January 2017	31 December 2022
Harrow	<20 % of the local authority area (2 Wards)	**7 December 2015/ 1 June 2016	6 December 2020/ 31 May 2021
Newham	borough-wide	1 January 2013	31 December 2017
Southwark	<20 % of the local authority area (c.5,000 private rented homes across the borough)	1 January 2016	31 December 2020
Tower Hamlets	<20 % of the local authority area (3 Wards)	1 October 2016	30 September 2021
Waltham Forest	borough-wide	1 April 2015	31 March 2020

* planned date of introduction.

** dates apply to two separate selective licensing schemes introduced for Edgware Ward and Wealdstone Ward.



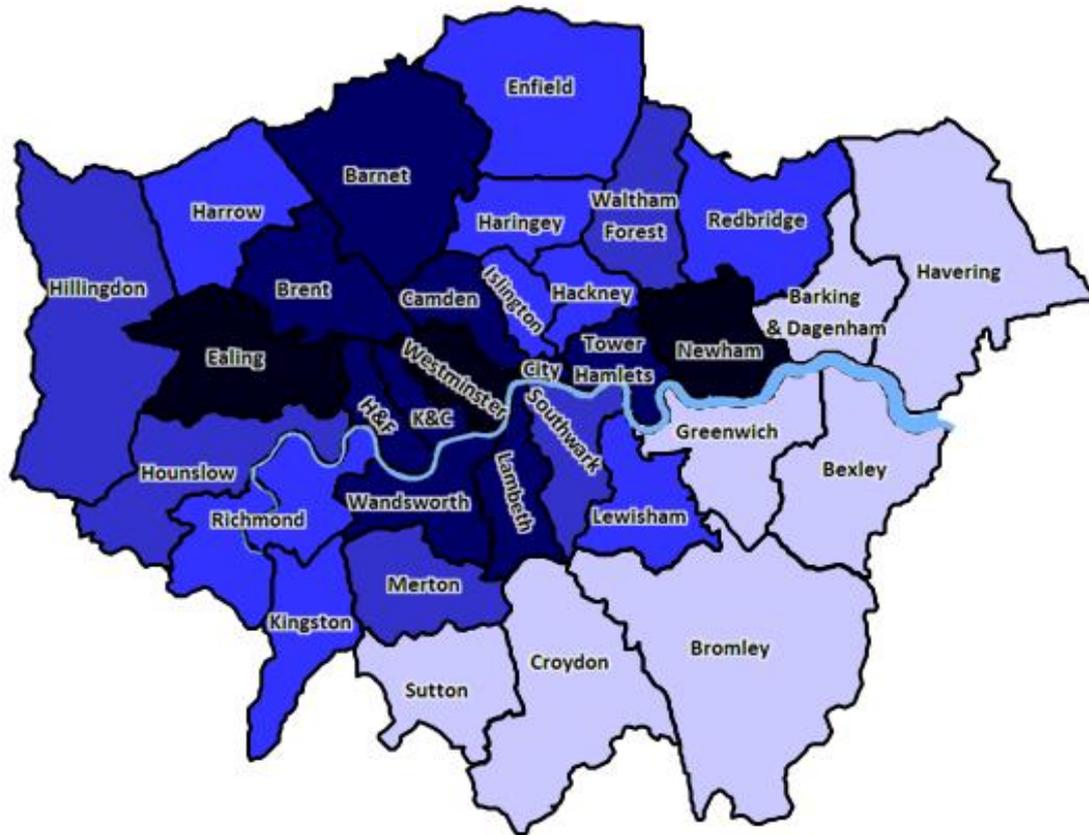
Private Rented Sector in London

Figure 3: Households living in the private rented sector, by local authority.¹⁸

	No. of households renting from a private landlord	Private rented sector (as a % of housing stock)
City of London	1,000	32.6
Barking and Dagenham	16,000	20.3
Barnet	43,000	31.1
Bexley	11,000	11.4
Brent	43,000	34.8
Bromley	18,000	14.1
Camden	35,000	32.0
Croydon	29,000	18.6
Ealing	48,000	35.0
Enfield	28,000	21.0
Greenwich	21,000	19.7
Hackney	25,000	23.3
Hammersmith and Fulham	28,000	33.1
Haringey	26,000	23.9
Harrow	25,000	24.6
Havering	14,000	13.8
Hillingdon	31,000	28.2
Hounslow	31,000	28.3
Islington	27,000	25.5
Kensington and Chelsea	25,000	33.1
Kingston upon Thames	16,000	22.4
Lambeth	47,000	34.4
Lewisham	31,000	23.6
Merton	25,000	29.3
Newham	49,000	42.5
Redbridge	27,000	24.1
Richmond upon Thames	18,000	21.9
Southwark	37,000	26.4
Sutton	17,000	20.5
Tower Hamlets	34,000	31.5
Waltham Forest	32,000	30.0
Wandsworth	42,000	31.2
Westminster	49,000	43.3
Inner London	458,000	30.9
Outer London	493,000	23.9
Greater London	950,000	26.8

Source: GLA, London Datastore

Figure 4: Density of the Private Rented Sector, by London borough. ¹⁹



Private Rented Sector (as a % of local housing stock)	
10 - 20%	
21 - 25%	
26 - 30%	
31 - 34%	
35 - 45%	

Survey Methodology

In order to assess how local authorities are responding to the growing size of the private rented sector and the need to improve conditions, a Freedom of Information (FOI) request was submitted to all 32 London boroughs asking for the following information:

- 1) The total number of inspections carried out using the Housing Health and Safety Rating System (HHSRS) in 2015/16?
- 2) The total number of Category 1 hazards – as defined by the 2004 Housing Act – found by officers in 2015/16.
- 3) The total number of improvement notices served in the course of dealing with Category 1 or 2 hazards?
- 4) The total number of prohibition orders made in the course of dealing with Category 1 or 2 hazards?
- 5) The total number of hazard awareness notices served in 2015/16?
- 6) The number of housing prosecutions taken by your local authority under the Housing Act 2004 in 2015/16?

The City of London was left out from this request as it was felt the number of residents was too low to provide any meaningful data.

A total of 32 responses were received, with every borough responding to the request.

18 boroughs were able to provide a full set of answers containing all the information sought.

Of the 14 boroughs which were unable to provide answers to every question asked, typically this was due to not recording the number of inspections carried out using the HHSRS and/or not being able to distinguish between the different categories of hazard found during visits.

This appears to indicate that in most cases London boroughs have developed good systems for recording their enforcement activity in the private rented sector and are able to identify key trends and/or areas suffering from poor housing conditions. Nevertheless, as the sector continues to grow it will be important that all boroughs follow best practice procedures, for example by recording when and where Category 1 hazards are found.

Some caution should be applied when comparing the number of formal notices served, as a number of boroughs were keen to stress that their approach involved offering informal advice to landlords to remove any hazards identified, with formal action being used as a last resort.

Summary of Results

- **A quarter** of councils in London (8 boroughs) failed to prosecute a single landlord for providing unsafe accommodation in 2015/16.
- **A further half** of London's councils (16 boroughs) prosecuted fewer than 10 landlords for providing unsafe accommodation in 2015/16.
- One council alone (Newham) was responsible for **70 per cent** of prosecutions taken under the Housing Act (2004) in London.
- Greenwich was responsible for the second highest number of prosecutions (26), accounting for **6 per cent** of all prosecutions taken under the Housing Act (2004) in London.
- **Over 4,000** Category 1 hazards (i.e. those representing the most serious risks to tenants) were identified in London's private rented sector properties in 2015/16 alone.
- On average, London boroughs inspected **one in every 54 homes** in the private rented sector using the Housing Health and Safety Rating System (HHSRS).
- There is significant variation in the level of enforcement activity by London boroughs, with some councils inspecting **one in every 10** private rented properties for hazards, and others only inspecting around **one in every 600 properties**.

Full Survey Results

Figure 5: Enforcement activity in the private rented sector in 2015/16, by local authority

Borough	Total no. of HHSRS* inspections	No. of Category 1 hazards identified	No. of improvement notices served**	No. of prohibition orders served**	No. of hazard awareness notices served**	Total no. of housing prosecutions
Barking & Dagenham	140	7	23	10	0	12
Barnet	1316	243	5	8	5	2
Bexley	-	-	15	0	0	0
Brent	476	108	70	5	23	14
Bromley	-	5	4	1	1	1
Camden	283	-	35	4	4	5
Croydon	973	171	252	5	7	0
Ealing	221	-	21	25	14	9
Enfield	375	83	39	8	50	0
Greenwich	2010	728	221	108	12	26
Hackney	238	21	16	4	1	1
Hammersmith & Fulham	-	42	6	5	0	3
Haringey	495	229	118	25	-	10
Harrow	1453	213	116	2	28	3
Havering	24	17	2	0	3	0
Hillingdon	-	-	1	2	1	-
Hounslow	932	193	12	10	3	6
Islington	442	153	75	11	7	-
Kensington & Chelsea	-	-	10	10	5	2
Kingston upon Thames	287	45	10	2	0	0
Lambeth	-	-	56	5	0	4
Lewisham	45	18	27	28	0	0
Merton	155	39	1	0	1	0
Newham	1920	-	58	10	0	286
Redbridge	668	1500	5	26	3	1
Richmond upon Thames	246	53	20	9	6	4
Southwark	-	64	222	18	2	8
Sutton	34	16	16	1	1	1
Tower Hamlets	139	54	64	7	1	14
Waltham Forest	478	307	17	15	0	6
Wandsworth	147	-	36	3	0	0
Westminster	-	-	19	9	200	5
TOTAL	13,074	4,282	1,569	366	378	411

Source: London Assembly Liberal Democrat Group

* Housing Health and Safety Rating System

** See page 7 for an explanation of these measures.

Figure 6: Ratio of HHSRS inspections to the number of households living in the private rented sector²⁰

Borough	Total no. of HHSRS inspections (2015/16)	No. of households renting from a private landlord (2014)	Ratio of inspections to PRS households
Barking and Dagenham	140	16,000	1 : 114
Barnet	1316	43,000	1 : 33
Bexley	-	(11,000)	-
Brent	476	43,000	1 : 90
Bromley	-	(18,000)	-
Camden	283	35,000	1 : 124
Croydon	973	29,000	1 : 30
Ealing	221	48,000	1 : 217
Enfield	375	28,000	1 : 75
Greenwich	2010	21,000	1 : 10
Hackney	238	25,000	1 : 105
Hammersmith and Fulham	-	(28,000)	-
Haringey	495	26,000	1 : 53
Harrow	1453	25,000	1 : 17
Havering	24	14,000	1 : 583
Hillingdon	-	(31,000)	-
Hounslow	932	31,000	1 : 33
Islington	442	27,000	1 : 61
Kensington and Chelsea	-	(25,000)	-
Kingston upon Thames	287	16,000	1 : 56
Lambeth	-	(47,000)	-
Lewisham	45	31,000	1 : 689
Merton	155	25,000	1 : 161
Newham	1920	49,000	1 : 26
Redbridge	668	27,000	1 : 40
Richmond upon Thames	246	18,000	1 : 73
Southwark	-	(37,000)	-
Sutton	34	17,000	1 : 500
Tower Hamlets	139	34,000	1 : 245
Waltham Forest	478	32,000	1 : 67
Wandsworth	147	42,000	1 : 285
Westminster	-	(49,000)	-
London	13,074	702,000*	1 : 54

*total excludes those boroughs where the number of HHSRS inspections is not known.

Recommendations

Recommendation 1

The Mayor should undertake an urgent review of conditions in the private rented sector with a view to sharing best practice among London's boroughs and encouraging a more consistent approach to enforcement across the capital.

Recommendation 2

The Mayor should work with Government to increase the resources available to councils and reduce the timescales involved in prosecuting private landlords in cases of poor property conditions.

Recommendation 3

The Mayor should ensure that his proposed database of rogue landlords includes details of all enforcement activity carried out by local authorities in London.

Recommendation 4

The Mayor should lobby Government for the power to introduce a mandatory licensing scheme for all private landlords in London, with the aim of professionalising the sector, improving conditions and removing rogue landlords from the housing market. In the short-term, the Mayor should also lobby Government to ensure that all existing borough-wide licensing schemes are renewed where this has the support of the local authority.

Recommendation 5

The Government should abolish restrictions on the size and coverage of selective licensing schemes in London.

Recommendation 6

The Mayor should encourage all boroughs to keep an up-to-date record of the number of inspections carried out using the Housing Health and Safety Rating System, including when and where Category 1 hazards are identified.

For more information about this report, or any comments relating to enforcement in the private rented sector, please contact Caroline Pidgeon on **0207 983 4362**, or email: caroline.pidgeon@london.gov.uk.

Endnotes

- ¹ DCLG, English Housing Survey Headline Report 2013-14, Section 1, Household tables: Trends in tenure, Annex table 1.2: <https://www.gov.uk/government/statistics/english-housing-survey-2013-to-2014-headline-report>
- ^{2,3} Figures derived from an online survey of 4,544 English private renters carried out by YouGov between December 2013 and January 2014. See Shelter, 'Can't complain: why poor conditions prevail in private rented homes' (2014): https://england.shelter.org.uk/_data/assets/pdf_file/0006/892482/6430_04_9_Million_Renters_Policy_Report_Proof_10_opt.pdf
- ⁴ Sadiq Khan, 'A Manifesto for all Londoners', 2016.
- ⁵ See 'How will Sadiq Khan help London's private renters?', Guardian, 02 June 2016: <https://www.theguardian.com/uk-news/davehillblog/2016/jun/02/how-will-sadiq-khan-help-londons-private-renters>
- ⁶ See the Mayor's answer to Question No.2016/3630 at Mayor's Question Time on 19 October 2016.
- ⁷ For more information see DCLG, 'Housing health and safety rating system: guidance for landlords and property-related professionals' (2006): <https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-guidance-for-landlords-and-property-related-professionals>
- ⁸ Adapted from House of Commons Library Research Briefing (SN01917) 'The Housing Health and Safety Rating System' (2015): <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01917>
- Adapted from House of Commons Library Research Briefing (SN/SP/4634) 'Selective Licensing of Privately Rented Housing (England & Wales)' (2015): <http://www.parliament.uk/briefing-papers/SN04634.pdf>
- ⁹ Office of the Deputy Prime Minister 'Housing Health and Safety Rating System Enforcement Guidance' (2006): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7853/safetyratingsystem.pdf
- ^{10,8} For more information see DCLG, 'Selective licensing in the private rented sector: a guide for local authorities' (2015): <https://www.gov.uk/government/publications/selective-licensing-in-the-private-rented-sector-a-guide-for-local-authorities>
- ¹² See Part 3 of the Housing Act (2004): <http://www.legislation.gov.uk/ukpga/2004/34/contents>
- ¹³ See DCLG, 'Review of Property Conditions in the Private Rented Sector' (2014); and the [Government Response](#) to this discussion document.
- ¹⁴ Restrictions on borough-wide selective licensing were introduced via 'The Selective Licensing of Houses (Additional Conditions) (England) Order 2015': http://www.legislation.gov.uk/uksi/2015/977/pdfs/uksi_20150977_en.pdf
- ¹⁵ See Redbridge Council's 'property licensing schemes' consultation: http://www2.redbridge.gov.uk/cms/council_tax_benefits_housing/housing/private_housing/houses_in_multiple_occupation/selective_licensing.aspx?utm_source=external%20&utm_medium=friendly_url%20&utm_campaign=prs
- ¹⁶ See Brent Council's consultation on extending its selective licensing scheme: <https://www.brent.gov.uk/council-news/september-2016/improving-the-private-rented-sector-should-brent-extend-private-rented-property-licensing/>
- ¹⁷ For more information on those councils currently considering introducing selective licensing scheme see the following website: <http://www.londonpropertylicensing.co.uk/>
- ^{18,14} GLA, London Datastore, Housing Tenure of Households, by Borough: <http://data.london.gov.uk/dataset/housing-tenure-households-borough>
- ²⁰ Figures derived from GLA, London Datastore (Housing Tenure of Households, by Borough) and responses to a Freedom of Information request submitted by the London Assembly Liberal Democrat Group.