



Mayor and Cabinet

Report title: Policies to Support the Regulation and Enforcement of the Private Rented Housing Sector in Lewisham

Date: 9 June 2021

Key decision: Yes

Class: Part 1

Ward(s) affected: All

Contributors:

Executive Director for Housing, Regeneration and Public Realm, Director of Corporate Resources, Director of Law, Governance & HR

Outline and recommendations

- Mayor and Cabinet is asked to consider three policies, all of which deal with the regulation and enforcement of private rented housing within the borough. These comprise:
 - The General Enforcement Policy
 - The Smoke and CO Alarm (England) Regulations 2015 Statement of Principles
 - The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Mayor and Cabinet is requested to agree to:
 - Adopt the General Enforcement Policy as the General Private Sector Housing Agency Enforcement Policy, including:
 - Adding a fee of £150 for the production of VAT exemption certificates to the Borough's register of fees and charges
 - Adopt the Smoke and CO Alarms Statement of Principles policy as Lewisham Council's Statement of Principles for the application of the Smoke and CO Alarm (England) Regulations 2015
 - Adopt the Electrical Safety Standards in the Private Rented Sector (England) Regulations Policy as the Private Sector Housing Agency's policy on the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
 - Permit the Director of Housing to delegate authority to carry out the functions set out in the above policies to officers within the service

Timeline of engagement and decision-making

9 June 2021

Report presented to Mayor and Cabinet

1. Summary

- 1.1. This report seeks to obtain approval to adopt three new policies within the Private Sector Housing Agency (PSHA).
- 1.2. The report highlights the policies and details how the powers and duties will enable council officers to deal with the regulation of the private rented housing sector.
- 1.3. This report considers the financial and legal implications of the proposals and makes a number of recommendations to Mayor and Cabinet.

2. Recommendations

- 2.1. Mayor and Cabinet are asked to agree to:
 - 2.1.1. Adopt the Private Sector Housing Enforcement and Licensing Policy, including:
 - 2.1.1.1. Adding a fee of £150 for the production of VAT exemption certificates to the Borough's register of fees and charges, as outlined in sections 5.9 – 5.12 of this report
 - 2.1.2. Adopt the Smoke and CO Alarms Statement of Principles policy as Lewisham Council's Statement of Principles about the application of the Smoke and CO Alarm (England) Regulations 2015
 - 2.1.2.1. Approve the proposed Civil Financial Penalties proposed at section 6.9 of this report
 - 2.1.3. Adopt the Electrical Safety Regulations Policy as the Private Sector Housing Agency's policy on the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
 - 2.1.4. Permit the Director of Housing to delegate authority to carry out the functions set out in the three policies to officers within the service

3. Policy Context

- 3.1. The contents of this report are consistent with the Council's policy framework.
- 3.2. It supports the achievements of the Corporate Strategy 2018-22 objectives for tackling the housing crisis:
 - Everyone has a decent home that is secure and affordable
 - More social and genuinely affordable housing
 - Improved standards across all housing sectors
 - Residents are supported to have a stronger voice
- 3.3. The content of this report supports the Council's Housing Strategy 2020-26:
 - Preventing homelessness and meeting housing need
 - Improving the quality, standard and safety of housing
 - Supporting our residents to live safe, independent and active lives

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4. Background

- 4.1. The Private Sector Housing Agency's remit is Lewisham's Private Rented Sector, which is approximately 32,000 properties throughout the Borough. This is 25% of Lewisham's housing stock. Officers' duties include:
- The licensing of HMOs
 - The enforcement of housing standards
 - The investigation and prosecution of landlords who illegally evict and harass their tenants
 - Bringing long term empty properties back into use
- 4.2. Stakeholders include landlords, tenants, neighbours and visitors to these properties. This policy explains when each group can expect PSHA officers' help, the circumstances in which the PSHA may refuse to get involved and when the PSHA does not have the power to assist.
- 4.3. There are situations in which the Council has to act, such as when there are category 1 hazards in a property or a property is an unlicensed HMO. There are other decisions that PSHA officers take that involve them making a choice about whether to take action. In every case where officers find a problem, there are choices that have to be made about how to respond.
- 4.4. Lewisham has a growing number of long term empty homes – similar to many other London boroughs - as people struggle to find finances to tackle long term empty dwellings. Long term empty dwellings often attract crime and anti-social behaviour and can lower the value of property in close proximity, by up to 18%, and make selling and renting homes difficult. Tackling empty homes through encouraging and supporting investors is a key aspect of the empty homes strategy.
- 4.5. In order to carry out its obligations, the PSHA is proposing to adopt three new policies, as follows:
- 4.6. The General Enforcement Policy which sets out the powers officers in the Private Sector Housing Agency can use to regulate the private rented housing sector. It describes the levels of possible intervention, ranging from signposting and advice through to emergency works in default and Emergency Prohibition Orders. It helps officers and residents to understand when and why a particular level of intervention has been used.
- 4.7. The Smoke and CO Alarm (England) Regulations 2015 Statement of Principle which establishes a basic standard of fire and CO protection in rented properties that are not Houses in Multiple Occupation. It provides powers for the Council to install appropriate alarms and issue landlords with Civil Penalty Notices.
- 4.8. The Electrical Safety Regulations Policy details the powers given to Councils, when they come into force, who they apply to and the criteria PSHA officers will use exercising them. It will help officers and members of the public understand why a particular power has been used, and promote consistency in enforcement throughout the borough.

5. General Private Sector Housing Agency Enforcement Policy

- 5.1. The Current Lewisham Council Enforcement Policy was approved in January 2016. It is to be reviewed every 5 years. The policy sets out how Council Officers will carry out their enforcement functions concerning Food Standards, Planning, Environmental Health and Environmental Enforcement. It is expected that the new PSHA Enforcement Policy will be subsumed into the general Enforcement Policy when it is next reviewed.

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- 5.2. The policy sets out the powers officers in the Private Sector Housing Agency can use to regulate the private rented housing sector. It describes the levels of possible intervention, ranging from signposting and advice through to emergency works in default and Emergency Prohibition Orders. It helps officers and residents to understand when and why a particular level of intervention has been used.
- 5.3. It does not take a “one size fits all” approach. The policy sets out four levels of enforcement activity, namely:
 - Signposting and advice
 - Informal enforcement
 - Formal (statutory) enforcement
 - Emergency enforcement
- 5.4. Officers work with all stakeholders and first try to deal with the issues informally. Matters are only escalated into formal enforcement activity, such as serving statutory notices, issuing civil financial penalties or prosecution of offenders, where informal action has failed to produce an acceptable outcome. Severe emergency powers are reserved for the most serious cases, where there is an imminent risk of serious harm to residents or visitors.
- 5.5. The policy explains the Council’s duties, landlord, tenant and agent responsibilities and the potential sanctions the council can take where attempts to work with landlords to help them comply with the law fail. It explains how the most appropriate option in each case is decided and what is taken into account when reaching this decision.
- 5.6. There will be some cases in which it is appropriate to start enforcement activity at a higher level. This might be where trying to persuade a landlord to carry out repairs would take away a tenant’s protection from retaliatory eviction, or where a landlord has behaved dishonestly, has a history of non-compliant or criminal business practices or has gained a commercial advantage by deliberately failing to live up to their responsibilities.
- 5.7. This policy sets out where PSHA officers will consider moving from the starting point of working with landlords, and what they will take into account in making this decision. It is designed to set out what the council expects from its stakeholders in the PRS, and to ensure the enforcement activity taken is consistent and proportionate when they fail to meet this standard.
- 5.8. The Policy sets out the charges to be applied to certain statutory notices and other functions where there is the power to do so.
- 5.9. Furthermore, the government has sought to encourage and incentivise those seeking to tackle long term empty dwellings with a VAT reduction bonus. Those taking on a property empty for 2 years are able to make a claim to HMRC to claw back 15% of VAT on professional fees, materials and labour costs. A zero rated incentive has been set out for dwellings empty for 10 years or more or for the conversion of office/ warehouse space into residential units.
- 5.10. The Building and Construction (VAT Notice 708) permits developers to rely upon a certificate from the Local Authority’s Empty Homes Officer to enable them to pay VAT at the reduced rate. Local Authorities are under no obligation to provide these VAT reduction certificates, however, they are a strong incentive and support to those taking on the challenge of turning around a long term empty property. As a result of its discretionary nature, the Council is entitled to charge for this service by virtue of S93 of the Local Government Act 2003.
- 5.11. Providing certificates confirming the length of time a dwelling has been empty involves 4-5 hrs of officer time. These certificates are often worth many thousands of pounds to a property investor in VAT exemptions.

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- 5.12. It is proposed that the Council begin to charge for this service. The proposed charge of £150 is based upon 4-5 hours of the Empty Home Officer's time in investigating the property and preparing the report. It is proposed that this additional charge is added to Appendix 1 – Fees and Charges Schedule of the Enforcement Policy.

6. Smoke and Carbon Monoxide Alarms (England) Regulations 2015

- 6.1. The Smoke and CO Alarm (England) Regulations 2015 [require](#) local housing authorities to publish a statement of principles before Civil Penalty Notices can be issued under this legislation. Currently, there is no document in place. Officers dealing with fire precautions in rented properties that are not HMOs are therefore not able to use the possibility of financial sanctions as a means of deterring non-compliance.
- 6.2. The Smoke and Carbon Monoxide Alarms (England) Regulations 2015 create a duty for landlords in the Private Rented Sector to provide:
- 6.2.1. a smoke alarm on every floor of a rented property that contains a room used solely or partly as accommodation,
- 6.2.2. a CO alarm in every room that contains a solid fuel burning device
- 6.2.3. and to check that these are in working order at the start of each new tenancy
- 6.3. This duty applies to all Private Rented Sector properties with the exception of:
- 6.3.1. licensed HMOs, where the provisions are mirrored in the mandatory licence conditions at [schedule 4 Housing Act 2004](#)
- 6.3.2. lodger arrangements (where tenants share facilities with the landlord and their household)
- 6.4. Where there are multiple owners of a property, for example a leaseholder and a freeholder, the “relevant landlord” is defined as the immediate landlord (the person who granted the tenancy and receives the rent).
- 6.5. There is a statutory duty on the local authority to serve a Remedial Notice where there are reasonable grounds to believe that a landlord is in breach. Serving the notice creates two further duties: on the landlord to comply with the notice and on the local authority to carry out works in default.
- 6.6. The local authority have a statutory obligation to publish a statement of principles about how these charges will be calculated.
- 6.7. The proposed statement of principles sets out what will be considered when the Council takes enforcement action against a landlord who fails to comply with the duties imposed by the Regulations.
- 6.8. The regulations empower the local authority to serve a Penalty Charge of up to £5000 where a landlord fails to comply with a remedial notice.
- 6.9. The draft Statement of Principles includes the below suggested Civil Financial Penalties:

1 st offence	£2,500 (reduced to £1,250 if paid within 14 days)
2 nd offence	£5,000 (reduced to £2,500 if paid within 14 days)
3 rd and subsequent offences	£5,000

- 6.10. These are commensurate with those proposed by comparable local authorities, which are as follows:

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LA (click for links to the policies)	1 st offence	2 nd offence	3 rd and subsequent offences
Southwark	£2,500	£5,000	£5,000
Croydon	£2,500 (reduced to £1,500 if paid within 14 days)	£4,500	£4,500
Lambeth	£5,000 (reduced to £2,500 if paid within 14 days)	£5,000 (reduced to £2,500 if paid within 14 days)	£5,000 (reduced to £2,500 if paid within 14 days)
Hackney	£5,000 (reduced to £2,500 if paid within 14 days)	£5,000 (reduced to £2,500 if paid within 14 days)	£5,000 (reduced to £2,500 if paid within 14 days)
Bexley	£500 (reduced by £150 if paid within 14 days)	£2,500	£4,500
Westminster	£2,500 (50% reduction if paid within 14 days)	£5,000	£5,000

7. Electrical Safety in the Private Rented Sector (England) Regulations 2020

- 7.1. The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 (“the electrical safety regulations”) came into force in 2020, and apply to all new tenancies from 1st July 2020 and to all existing tenancies from 1st April 2021. It applies to all properties in the Private Rented Sector, and consolidates electrical safety legislation and enforcement into one statutory instrument. It places a positive duty on landlords to prove that the electrical installations in rented properties are safe and sets out an enforcement regime where they are unable or unwilling so to do.
- 7.2. The regulations impose three primary duties upon landlords, namely:
- 7.2.1. Ensuring that minimum electrical safety standards are met during any period that the property is occupied.
- 7.2.2. Ensuring fixed electrical cables or fixed electrical equipment located on the consumer’s side of the electricity supply meter is inspected and tested at least every 5 years by a qualified person
- 7.2.3. Carrying out the first inspection and test, before the tenancy commences (new tenancies) or by 1st April 2021 (existing tenancies).
- 7.3. The Regulations provide guidance on how a landlord must demonstrate their compliance with these duties. The principle medium for doing so is the Electrical Safety Certificate. This must have been provided to all new or prospective tenants from the 2020 implementation date, and to all tenants from the 2021 implementation date. Where the certificate indicates that the electrical installations in the property are unsafe, the landlord must carry out remedial works within 28 days, and provide certification confirming that this has been done.
- 7.4. The Council’s powers under the regulations flow from the power to require landlords to produce electrical safety certificates on request. A failure to do so triggers the following powers. It should be noted that all powers save serving Remedial Action Notices and Issuing Civil Penalties require the tenants’ consent.

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- 7.5. The Remedial Notice sets out the steps that the Council require the landlord to take to make the electrical installations within their property safe. It must be served when at least one of the following applies:
 - 7.5.1. The Landlord failed to ensure safety standards
 - 7.5.2. The Landlord failed to ensure regular inspection and testing
 - 7.5.3. The Landlord failed to ensure first test and inspection carried out before a specified tenancy, or by 1st April 2021 on an existing tenancy
- 7.6. The notice sets out what the council requires the landlord to do, the timescales involved, the landlord's rights of appeal and the potential consequences of non-compliance. All other powers flow from the landlord failing to comply with a Remedial Action Notice.
- 7.7. **Urgent Remedial Action** may be taken where a report from a qualified person indicates that urgent action is necessary to keep the residents safe, the council is satisfied that it is more likely than not that the landlord is in breach of one or more of his duties under the regulations and the tenants consent to the council taking action. Notice does not have to be served on the landlord in advance, but must be served within 7 days of work starting on the property. Landlords can appeal, but appealing does not suspend the action. Tenants must be given 48 hours' notice of the time and date upon which work will start, and all qualified individuals must carry identification and authorisation.
- 7.8. **Remedial Action** must be taken where the council are satisfied that it is more likely than not that the landlord is in breach of one of their duties under the regulations, and the tenants consent. The landlord must be given 28 days' notice in writing, and has a right to appeal. If the landlord exercises their appeal rights, the notice and action are suspended until this is determined.
- 7.9. **Costs** can be reclaimed for remedial and urgent remedial action. A demand for costs must be served upon the landlord and becomes payable in 21 days. The landlord can appeal against this.
- 7.10. **Civil Penalty Notice** can be issued where there is noncompliance with the initial Remedial Notice and the landlord remains in breach of one of the duties under the regulations. The offence that triggers the penalty is the breach of duty not the noncompliance with the notice. Civil Penalty Notices can be up to £30,000. A Civil Penalty Notice can be issued concurrently to either urgent or non-urgent remedial action.
- 7.11. The Electrical Safety Regulations Policy sets out what the PSHA will consider before taking any of the possible steps under the regulations. It sets out the essential information that stakeholders can expect to be contained in Remedial Notices and Notices of Urgent and non-urgent Remedial Action.
- 7.12. It sets out the circumstances in which the PSHA will take the discretionary steps of Urgent Remedial Action and issuing Civil Penalty Notices and what is taken into account before a decision to proceed is made.
- 7.13. The Civil Penalty Notice process and the route to which the level of financial penalty is set is explained in detail in the proposed policy. The starting point and the twin concepts of the level of the landlord's culpability and the potential harm caused by the breach of duty are set out in table form. The policy describes the aggravating features that may be taken into account to raise a penalty and gives landlords a guide to that general class of factors that are likely to be successful in reducing one. It also provides information about appeal rights and timescales.

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8. Financial implications

- 8.1. There are no direct financial implications to consider so far as the General PSHA enforcement policy is concerned. The service is already set-up to do these tasks and no additional funding is being requested.
- 8.2. This report recommends that the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 is adopted as the Private Sector Housing Agency's policy on the Electrical Safety Standards.
- 8.3. It further recommends that the Director of Housing is permitted to delegate authority to carry out the functions set out in the policy to officers within the private sector housing agency service.
- 8.4. Costs incurred in complying with any enforcement notice under this policy will fall on the landlord to fund. If, for any reason, the authority has to fund remedial and urgent remedial action to bring units up to standard, these can be reclaimed from the landlord. A demand for costs must be served upon the landlord and becomes payable in 21 days.
- 8.5. The service is currently resourced to undertake these tasks and no additional funding is being requested. As such, there are no direct financial implication arising from this report.

9. Legal implications

- 9.1. M&C are being asked to adopt a number of additional policies, all of which deal with the regulation and enforcement of private rented housing within the borough. They should be read in conjunction with other strategies and policies.
- 9.2. When discharging its duties in relation to private sector housing, the Council will follow the principles of good enforcement set out in the following:
 - 9.2.1. Regulators Compliance Code
 - 9.2.2. Criminal Procedure and Investigations Act 1996 (CPIA) and associated Code
 - 9.2.3. Police & Criminal Evidence Act 1984 (PACE) and associated Codes
 - 9.2.4. The Enforcement Concordat
 - 9.2.5. Housing Act 2004
 - 9.2.6. Regulation of Investigatory Powers Act 2000
 - 9.2.7. Housing and Planning Act 2016
 - 9.2.8. Environmental Health Enforcement Policy
 - 9.2.9. Other Legislation, Regulations and statutory guidance relating to each service area
 - 9.2.10. Procedures and guidance notes within each team

10. Equalities implications

- 10.1. The [Equality Act 2010](#) (The Act) legally protects people from discrimination in the workplace and in wider society. It replaced the previous anti-discrimination laws with a single act, making the law easier to understand and strengthen protection in certain situations.
- 10.2. The Act also imposes a public sector equality duty. This means that in public bodies, of which this Council is designated, they must consider all individuals in carrying out their day-to-day work when shaping policy, in delivering services and in relation to their own employees. It also requires public bodies to:

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- Have due regard to the need to eliminate discrimination
 - Advance equality of opportunity
 - Foster good relations between different people when carrying out their activities
- 10.3. The Council recognises diversity is one of its strengths and is committed to creating a more inclusive community. Therefore, having due regard to the Act, is confirmation of the Council's commitment to eliminating all forms of discrimination against any group within the community and to actively promote an equality of opportunity and positive community partnership.
- 10.4. In 2019, the Council undertook an Equalities Impact Assessment during the Borough Wide Selective Licensing and Additional HMO Licensing consultation. This was to assess the likely impact of the private sector housing licensing and enforcement policy on all groups protected under the Act. The assessment demonstrated, the Council's commitment to undertake regular intervals the effects of the policy and where necessary to take the appropriate action to prevent even direct or indirect discrimination as a result of the policy.
- 10.5. In acknowledgment of the duty, the work undertaken to monitor landlords of private sector accommodation, and the "[fit and proper person test](#)" for licensing in particular, will help prevent unlawful practice in the form of discrimination against residents who share a protected characteristic. Hence, practical approaches to fulfilling this duty will utilise all options available. For example, there is a recognition that where residents and landlords, for whom English is not their first language, any language and literacy barriers will be mitigated by the provision of translation and interpretation services as a way of engaging all stakeholders.

11. Climate change and environmental implications

- 11.1. These policies support the Council's wider work to improve the quality and energy efficiency of homes throughout the borough. Enforcement action taken against excessively cold properties using the Housing Health and Safety Rating System could result in action to improve buildings' thermal efficiency. An Energy Performance rating of E or above is necessary for any property to be considered to be suitable for use as a HMO and is picked up during the licensing process.

12. Crime and disorder implications

- 12.1. These policies will support the Council's wider work in improving community safety throughout Lewisham. In particular, all licenses issued for HMOs in the borough contain a condition that defines antisocial behaviour and requires landlords to take steps to address this where it is caused by residents in the HMO or their visitors. The ultimate sanction for a landlord who breaks the conditions of the licence is prosecution and the licence being revoked.

13. Health and wellbeing implications

- 13.1. [The Association of Directors of Public Health Policy Position: Housing and Health 2017](#) contains the following key messages:
- Housing is a key social determinant of health across the life course.
 - Homes should be warm, safe, ventilated, not overcrowded, affordable, accessible, and provide a sense of security.
- 13.2. This is reflected in the Council's Housing Strategy, which prioritises raising housing standards throughout the borough.

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- 13.3. This policy will contribute to the wider strategy through the use of the Housing Health and Safety Rating System and the enforcement powers under the Housing Act 2004 and Environmental Protection Act 1990 to raise standards in properties where hazards or statutory nuisances are detected. All licensed properties have to comply with [Lewisham's HMO Licensing Standards](#) before a licence can be issued. This will raise the housing standards in these properties.

14. Appendices

- 14.1. Appendix 1 – The Private Sector Housing Enforcement and Licensing Policy – proposed policy
- 14.2. Appendix 2 - The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 Statement of Principles – proposed policy
- 14.3. Appendix 3 – The Electrical Safety Regulations – proposed policy
- 14.4. Appendix 4 – The Electrical Safety Penalty Charge Calculator

15. Glossary

Term	Definition
House in Multiple Occupation-“HMO”	Property where at least three people who are not from the same household live and share some facilities such as kitchens, bathrooms and toilets
HMO licensing	Process by which the Council issues licenses to HMO landlords and managers. Requires the property to be up to licensing standards and the manager or landlord to be a fit and proper person
Licensable property	Property that fits the definition for either the national mandatory licencing scheme or any local additional or selective schemes. The national mandatory scheme covers homes where 5 or more people living in 2 or more households share facilities. Lewisham runs one additional scheme at present, which covers flats above shops shared by 3 or more people living in 2 or more households.
Hazards	Dangers to health and wellbeing commonly found in properties. Housing Act 2004 sets out 29 hazards .
Housing Health and Safety Rating System-“HHSRS”	A system to assess and grade how dangerous hazards are based upon the risk they pose and the level of harm they are likely to cause.
Category 1 hazard	The most serious hazards, where the likelihood of serious harm is highest. The council has to act to prevent category 1 hazards
Category 2 hazard	Less serious hazards, where either the likelihood of harm is lower

16. Report author and contact

- 16.1. Fenella Beckman, Director of Housing Services Fenella.Beckman@lewisham.gov.uk

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17. Comments for and on behalf of the Executive Director for Corporate Resources

- 17.1. Tony Riordan, Principal Accountant, Financial Services
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18. Comments for and on behalf of the Director of Law, Governance and HR

- 18.1. Leonard Tribe, Senior Lawyer, Legal Services Leonard.Tribe@lewisham.gov.uk

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