



Promoting good private sector housing for local people

Report on Havering Council's consultation on additional HMO and selective licensing proposals

September 2025

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1. Executive Summary

Havering Council is committed to improving the standard of privately rented property in the borough and creating a fair environment for both tenants and responsible landlords, targeting rogue operators and those letting unsuitable properties, driving up standards to the benefit of all.

In order to build on the achievements of its current additional (HMO) and selective licensing schemes, the Council is proposing to introduce two new schemes when the current schemes expire on 24 January 2026.

A selective licensing scheme is proposed for all privately rented homes (excluding HMOs) within seven out of 20 wards to address the prevalence of poor housing conditions.

These wards include:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans
- St Edwards

It is a requirement of the scheme that all properties in the designated areas that are rented to a single household (e.g., a family) or two unrelated sharers (e.g., two friends living together) will need to have a licence to be legally let. The scheme can be approved by Council's Cabinet and could be implemented in early 2026.

An additional HMO licensing scheme is also proposed in all wards of the borough. This would apply to all HMOs except those that already require a mandatory HMO licence and will help to drive up standards and ensure safer and better managed HMO accommodation. This scheme would be implemented concurrently with the selective licensing scheme. Additional HMO licensing can also be approved by the Council's Cabinet and could be implemented in early 2026.

When proposing to introduce discretionary property licensing schemes, the Housing Act 2004 requires councils to take reasonable steps to consult with all persons likely to be affected by the proposed designation(s). Havering Council commissioned Cadence Innova, an independent consultancy, specialising in collaborating with local authorities, to deliver public consultations to undertake an extensive programme of consultation activities and report independently on the findings.

To help inform all stakeholders, a consultation evidence pack was developed by Cadence Innova in conjunction with Havering Council, and this, along with other relevant documents, was available for the duration of the consultation on the council's [website](#). The Council also had a dedicated phonenumber and email inbox specifically to receive comments and submissions and to communicate with stakeholders for the duration of the consultation.

The consultation ran for 12 weeks from 14 April 2025 until 6 July 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the Council's proposals, both within and outside the borough. These methods included an online survey, two virtual public meetings with landlords, tenants, residents, and landlord groups, and 135 stakeholders were directly contacted and asked for their response to the consultation. Stakeholders included local councillors, voluntary community sector organisations, tenants and resident associations, housing charities,

emergency service commanders, neighbouring boroughs and all London borough councils. The council advertised the consultation through digital and print media, as well as in-person methods.

A total of 403 survey responses was received. The survey incorporated a quantitative approach and qualitative responses through free text boxes. Qualitative feedback outside of the survey was also received at two virtual public meetings (attended by 143 people in total) and from 31 written responses from interested parties.

The consultation looked at the level of support for introducing an additional HMO and a selective licensing scheme.

The consultation also sought views on:

- the proposed licence conditions
- associated fees
- potential discounts
- scheme objectives
- perceptions of the issues of poor property conditions
- anti-social behaviour (ASB) in the borough.

In addition, the consultation garnered views on issues within the HMO tenure, including:

- management and maintenance
- health and safety
- overcrowding
- noise, nuisance and other ASB
- landlords' responsibilities.

The results of the consultation survey and the views of stakeholders gathered during the consultation are analysed fully in this report.

1.1 Key Findings

The following analysis is based on definitive responses. Where a set of responses totals less than 100 per cent, the remaining proportion of respondents answered, 'neither agree nor disagree' or 'don't know'.

Selective Overall		Landlords, letting or managing agents	Residents (including private tenants) and businesses	Other stakeholders
Total consultation survey responses	403 responses	174 responses	220 responses	9 responses

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Agree with selective licensing proposal	41%	10%	63%	78%
Disagree with selective licensing proposal	47%	75%	27%	11%

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Agree with proposed selective licensing conditions	44%	12%	67%	6 7%
Disagree with proposed selective licensing conditions	38%	62%	20%	0%

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Selective licensing fee is about right	21%	4%	33%	44%
Selective licensing fee is too low	18%	0%	32%	11%
Selective licensing fee is too high	52%	93%	20%	22%

Additional HMO Overall		Landlords, letting or managing agents	Residents (including private tenants) and business	Other stakeholders
Total consultation survey responses	403 responses	174 responses	220 responses	9 responses

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Agree with additional HMO licensing proposal	59%	45%	69%	89%
Disagree with additional HMO licensing proposal	31%	36%	28%	0%

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Agree with proposed additional HMO licensing conditions	47%	24%	65%	78%
Disagree with proposed additional HMO licensing conditions	26%	32%	21%	0%

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Additional HMO licensing fee is about right	21%	10%	29%	56%
Additional HMO licensing fee is too low	22%	4%	36%	11%
Additional HMO licensing fee is too high	45%	76%	21%	11%

Scheme Objectives		Landlords, letting or managing agents	Residents (including private tenants) and business	Other stakeholders
Total consultation survey responses	403 responses	174 responses	220 responses	9 responses

Total responses to the question	403 responses	174 responses	220 responses	9 responses
Agree with scheme objectives	43%	15%	64%	67%
Disagree with scheme objectives	37%	60%	20%	22%

1.2 Conclusions

Alongside the quantitative data from the online survey, respondents had the opportunity to express their views in free-text form in response to several questions. Therefore, the aggregate online analysis offers only a partial view. The survey data, along with the free-form text responses, virtual public meetings, and other written representation received provide vital insights.

It must also be noted that for some questions, the proportion of responses classified as 'neither agree or disagree' and 'don't know' is, in a few cases, substantial (up to 42%); though generally between 10% and 20%. This uncertainty or neutrality among respondents suggests that many may not have strong opinions or find the issues complex. In the case that respondents were unsure about any aspect of the proposed schemes or consultation, the Council invited questions and comments through a dedicated phone line, email inbox and two public forums.

A major finding was the stark contrast in views about the proposals among different stakeholder groups. While residents (including private tenants) and business and other stakeholders generally support the Council's proposals, landlords, lettings and managing agents, and their representative bodies, were generally opposed.

The aggregate online survey data does not show overall support for the Council's selective licensing proposal although there is greater support for the proposed additional HMO scheme. Nevertheless, views expressed in the free-text responses ranged from positivity that the Council is actively tackling issues prevalent in the private rented sector (PRS) such as poor housing conditions, ASB and overcrowding, to concerns that the schemes were unnecessary, burdensome, a way for the Council to generate revenue and the cost of the licence fee would be passed on to tenants.

A significant number of the attendees at the public online forums were landlords and managing/letting agents who held strong views and were negative to property licensing schemes in general. In particular, they perceived unfairness of the scheme in targeting good landlords and were

concerned about the effectiveness of property licensing schemes and the Council's own ability to achieve its objectives. The main objections, however, were to the economic costs of licensing schemes on landlords, which they felt would inevitably be passed onto tenants.

The Council received a number of written responses from various stakeholders, both supporting and opposing the council's proposals. Another borough Council was also supportive, recognising the challenges in the PRS and expressed the positive outcomes from implementing their own property licensing schemes. In contrast, landlord representative organisations such as the NRLA, Safeagent and Propertymark objected to the proposals. They argued that the council should utilise existing enforcement powers to address issues in the PRS.

2. Introduction

2.1 Background

Between 14 April and 6 July 2025, Havering Council consulted on new licensing proposals for the PRS in the borough. Property licensing is a way of ensuring safer and better standards in private rented properties.

Havering is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Havering residents, including those who are vulnerable and on low incomes. Currently, 19.3% of Havering's housing stock is in the PRS, and this is expected to continue to rise in the future.

While the majority of properties in the PRS are well maintained and safe, there is a growing number of properties that are substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These properties pose a risk to the health, safety, and wellbeing of tenants, cause issues with neighbours, and require numerous interventions from council teams that are already under pressure. It is crucial for the Council to utilise all available tools to improve the situation for tenants renting properties in this sector. Licensing plays a key role in this effort.

2.2 Proposals

The Council is proposing to introduce a selective licensing scheme for all privately rented homes (excluding HMOs) within seven out of 20 wards to address the prevalence of poor housing conditions.

These wards include:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans and St Edwards.

It is a requirement of the scheme that all properties in the designated areas that are rented to a single household (e.g., a family) or two unrelated sharers (e.g., two friends living together) will need to have a licence to be legally let. The scheme can be approved by Council's Cabinet and could be implemented in early 2026 when the current scheme expires.

An additional HMO licensing scheme is also proposed in all wards of the borough. This would apply to all HMOs except those that already require a mandatory HMO licence and will help to drive up standards and ensure safer and better managed HMO accommodation. This scheme would be

implemented concurrently with the selective scheme. Additional HMO licensing can also be approved by the Council's Cabinet and could be implemented in early 2026 when the current scheme expires.

2.3 Public consultation

The consultation ran for 12 weeks from 14 April until 6 July. In order to gather as much feedback as possible from landlords, tenants, residents and other stakeholders, the Council used several strategies to promote the consultation.

The consultation focused on the extent to which respondents agree or disagree with the Council's proposal to introduce the additional HMO licensing and selective licensing schemes.

The consultation also looked at views on:

- the proposed licence conditions
- associated fees
- proposed discounts
- scheme objectives
- the respondents' perceptions of ASB
- poor property conditions
- other issues in the PRS in the borough.

Working alongside Cadence Innova, an independent consulting firm, specialising in collaborating with local authorities to deliver public consultations, the Council launched a comprehensive communications and marketing campaign to inform all stakeholders about the Council's ongoing consultation on the proposed introduction of selective licensing and additional HMO licensing schemes, with the aim of encouraging active participation.

The communications strategy was designed to inform and educate all stakeholders about the proposed licensing scheme and its potential benefits. The marketing approach was primarily focused on digital activities and online events. However, to meet the needs of the digitally excluded, physical hard copy communications were also made available.

Communications channels

- The Council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals.
- The council undertook various activities to engage all stakeholder groups, both within and outside the borough, and to raise their awareness about the consultation. These activities included:
- Updating the council website homepage with a news article and a link to the consultation on 14 April and 4 July 2025
- A press release to announce the start of the consultation was published on 14 April 2025
- A press release to announce the consultation would soon close was published on 4 July 2025
- The press release was linked to relevant housing web pages
- Approximately 300 leaflets were distributed at food banks and children centres
- A direct email was sent to 16 faith groups

- A direct email was sent to key stakeholders including all London councils, neighbouring borough councils, landlord accreditation and membership organisations, housing charities, emergency service commanders and integrated care boards on 24 June 2025.

Using the council's social media

- 10 Facebook posts with a total of 9,738 views, 6,999 people reached, 23 likes, 22 clicks, 2 saves and 7 shares
- 20 X (formerly known as Twitter) posts with a total of 1,516 impressions, 4 likes and 2 reshares

Activities to reach out to Havering tenants and residents included:

- News about the consultation was added in Havering newsletter, Live Well Havering on 8 May 2025 to 2,200 subscribers
- News about the consultation was included in Havering newsletter, At the Heart on 25 May 2025 to 13,275 subscribers
- News about the consultation was included in Havering newsletter, Living in Havering on 20 June 2025 to approximately 65,476 subscribers
- News about the consultation was included in Havering newsletter, Living in Havering on 4 July 2025 too approximately 65,476 subscribers
- Updating the Have your say section on:
 - 18 April 2025
 - 25 April 2025
 - 2 May 2025
 - 16 May 2025
 - 20 June 2025
- Leaflets and posters were displayed at:
 - Collier Row Children's Centre
 - Elm Park Children's Centre
 - Ingrebourne Children's Centre
 - Rainham Village Children's Centre
 - St Kilda Children's Centre
 - Acorn Specialist Children's Centre
 - Avelon Road Centre
 - Yew Tree Resource Centre

Activities to reach out to landlords included three direct emails to known landlords and agents operating in the Havering. The details are:

- 3,388 on 9 May 2025
- 3,388 on 9 June 2025

- 3,688 on 11 June 2025
- An out of home campaign added to 18 bus routes leaving Romford Bus Garage

Activities to reach out to landlords outside the borough included:

An out of home campaign with adverts added to Global, Clear Channel and JC Decaux media sites ran from 9 to 22 June 2025. The sites were in the following neighbouring boroughs:

- 4 sites in Bexley
- 6 sites in Barking & Dagenham
- 4 sites in Epping
- 2 sites in Brentwood
- 3 sites in Thurrock
- 24 bus routes leaving Dartford Bus Garage

In addition, the Chief Executives of the of the following organisations were written to directly:

- National Residential Landlords Association (NRLA)
- British Landlords Association (BLA)
- iHowz
- Safeagent
- UK Association of Letting Agents.

The Accreditation Officer at the London Landlord Accreditation Scheme (LLAS) was also directly contacted.

The following organisations were included on the press release distribution list:

- NRLA
- Arla Propertymark
- Safeagents
- LLAS
- iHowz
- Letting Agent Today
- London Property Licensing website
- BLA
- Guild of Letting & Management

A digital campaign with the London Property Licensing (LPL) ran between 17 April and 6 July 2025. LPL is the award winning, leading website for informing private landlords in the UK. It is the only website dedicated to providing simple, impartial and expert advice on property licensing and explaining the licensing requirements across every London borough. The website reaches out to landlords based throughout the UK and those based abroad. Since launching in April 2015, the website has received more than 2 million views. The Havering campaign included:

- From 24 April to 6 July 20-25, a rotating banner headline at the top of the LPL home page. The banner headline had a hyperlink to the LPL Havering property licensing consultation webpage
- A pixel banner advert promoting the licensing consultation was placed on the LPL homepage, Havering borough page.

- Anyone clicking on the advert was taken directly to the council's consultation webpage
- On 17 April 2025, the LPL Havering webpage was updated with information about the licensing consultation and a direct link to the council's consultation webpage in the orange 'At a Glance box' to encourage people to find out more and take part in the consultation. This is an additional feature added during the promotional period.
- From 24 April 2025 to 6 July 2025, a licensing consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultations page and Havering borough page. The listing summarised the purpose of the consultation and explained how to take part. The consultation webpage promoted the online consultation events that took place on 14 May and 18 June 2025
- A news article about the consultation was published on 22 April 2025 and promoted via social media and the LPL newsletter.
- The Havering consultation was promoted in newsletters distributed on 30 April and 5 June 2025. The newsletter is widely distributed to landlords, letting agents, organisations, local authority officers and government officials and sent to more than 3,700 people who have requested updates on housing regulation and property licensing schemes in London.
- The LPL LinkedIn page and LPL Facebook page carried news of the consultation on 29 April 2025
- Posts about the licensing consultation were published on the LPL X (formerly known as Twitter) feed (@lplicensing) every 15 to 17 days, timed to cover a variety of morning, afternoon and evening posts throughout the consultation period. During this period the @lplicensing X feed had more than 2,300 followers, generating impressions, likes, reposts and comments.

A programmatic digital campaign ran from 19 May to 8 June 2025. Digital adverts were placed using Google Display advertising and social media channels. The adverts were strategically placed to engage with the following stakeholders:

- Landlords
- Tenants
- Parents.

This was achieved by:

- targeting people who have searched for landlord insurance, legislation, guidance and property letting on the Google advertising platform
- targeting people with an interest in property development across news and social platforms.

Analytics from the campaign are summarised below:

689,646 impressions, 2,591 clicks, 4,401 interactions, 237,007 maximum reached.

Direct emails were sent to all of the Leader's offices, Chief Executives, Regulatory and Housing services at all boroughs across London on 24 June 2025.

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Posters and leaflets were sent to the following foodbanks

- Collier Row and Romford
- Harold Hill
- Rainham

Paper copies of the consultation were available at the following locations within the borough from 14 April 2025:

- Collier Row Library
- Elm Park Library
- Gidea Park Library
- Harold Hill Library
- Harold Wood Library
- Hornchurch Library
- Rainham Library
- Romford Library
- South Hornchurch Library
- Upminster Library.

Reaching out to local community and outreach groups to ask them to share the consultation with the groups they interact with via the Live Well Havering Network and sharing with the following organisations:

- Collier Row Children's Centre
- Elm Park Children's Centre
- Ingrebourne Children's Centre
- Rainham Village Children's Centre
- St Kilda Children's Centre
- Acorn Specialist Children's Centre
- Avelon Road Centre
- Yew Tree Resource Centre
- Collier Row and Romford Foodbank
- Harold Hill Foodbank
- Rainham Foodbank

The following organisations were included on the press release distribution list:

- Generation Rent
- Justice for Tenants
- Flat Justice
- Cambridge House
- Age UK Redbridge, Barking & Havering
- Reform
- Crisis
- Forward Trust
- Shelter
- Renters Rights London
- Refugee Council
- Central YMCA
- Citizens Advice Havering

Activities to make stakeholders within the Council aware of the consultation included:

- Updating the Council website corporate homepage carousel to include the consultation
- Posting a news article about the consultation on the Council website during the first week of the consultation and again 11 weeks into consultation
- A notice was placed on the internal newsletter, Global Newsletter edition,

Using the council's social media:

- 10 Facebook posts with a total of 9,738 views, 6,999 people reached, 23 likes, 22 clicks, 2 saves and 7 shares
- 20 X (formerly known as Twitter) posts with a total of 1,516 impressions, 4 likes and 2 reshares

2.4 Consultation methods

The Council used several methods to gather feedback from stakeholders about the Council's proposals.

Online survey

An online survey was open to the general public. Respondents could also request a paper version of the survey. A total of 403 survey responses was received. The consultation survey was the main method of gathering feedback during the consultation. Respondents were asked their views on selective and additional HMO licensing, the proposed fees, discounts, licence conditions, scheme objectives and their views on issues within the borough. Their responses are analysed and broken down by stakeholder type below. A copy of the survey questionnaire can be found in Appendix 3.

Public forums

The Council held two virtual public forums to provide more information about the proposed scheme and to gather feedback from landlords, residents and other stakeholders who would be impacted by licensing. The public meetings were held over Microsoft Teams and were facilitated by Cadence

Innova. This included a presentation of the Council's proposals followed by a question-and-answer session with Council officers. These events are summarised below:

- Virtual public forum 1, 14 May 2025
- Virtual public forum 2, 18 June 2025

The above meetings were widely publicised. 48 people registered for the first event with 41 actual attendees. 142 people registered for the second event with 102 actual attendees.

Other written feedback

The Council accepted feedback on the proposed licensing schemes by email or written response. The feedback in the emails received and written responses has been analysed below. The Council received 31 email responses regarding the consultation. Three written responses were received from stakeholder organisations and can be found in full at Appendix 4.

A letter of support for the scheme was also received from another borough council, which can be found in full in Appendix 5.

3. Consultation survey results

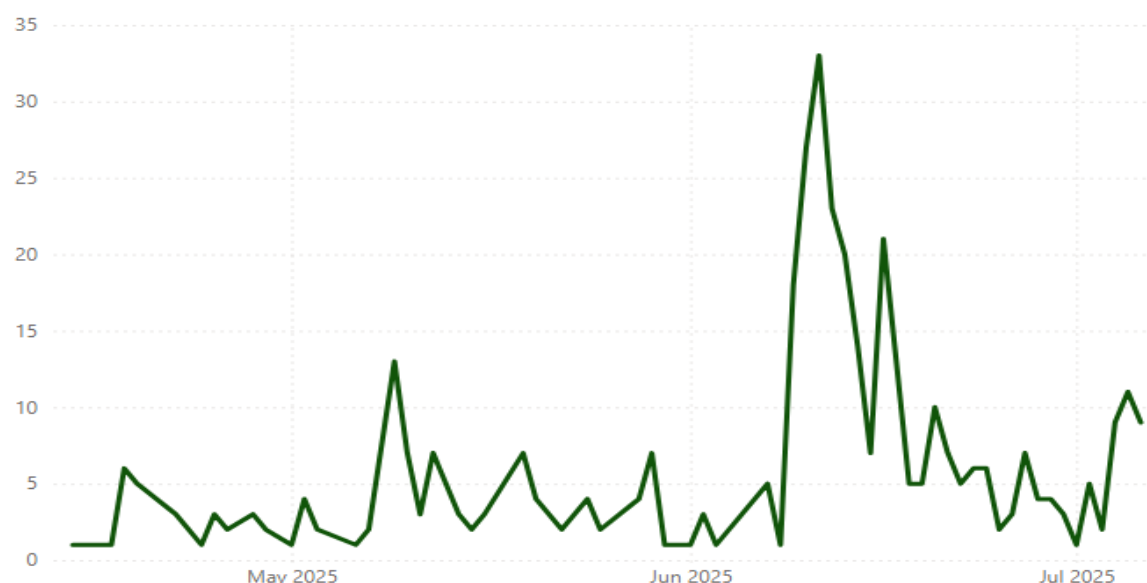
This section of the report presents the results from the consultation survey. There were **403** responses to the consultation survey.

In the following analysis, the percentages are based on the answers to the question and will state where fewer than the total 403 respondents answered the question.

3.1 Overall consultation response

The consultation ran from **14 April to 6 July 2025**, during which time, different stakeholder groups were engaged in myriad ways. The timeline of responses is shown below:

Number of respondents by date

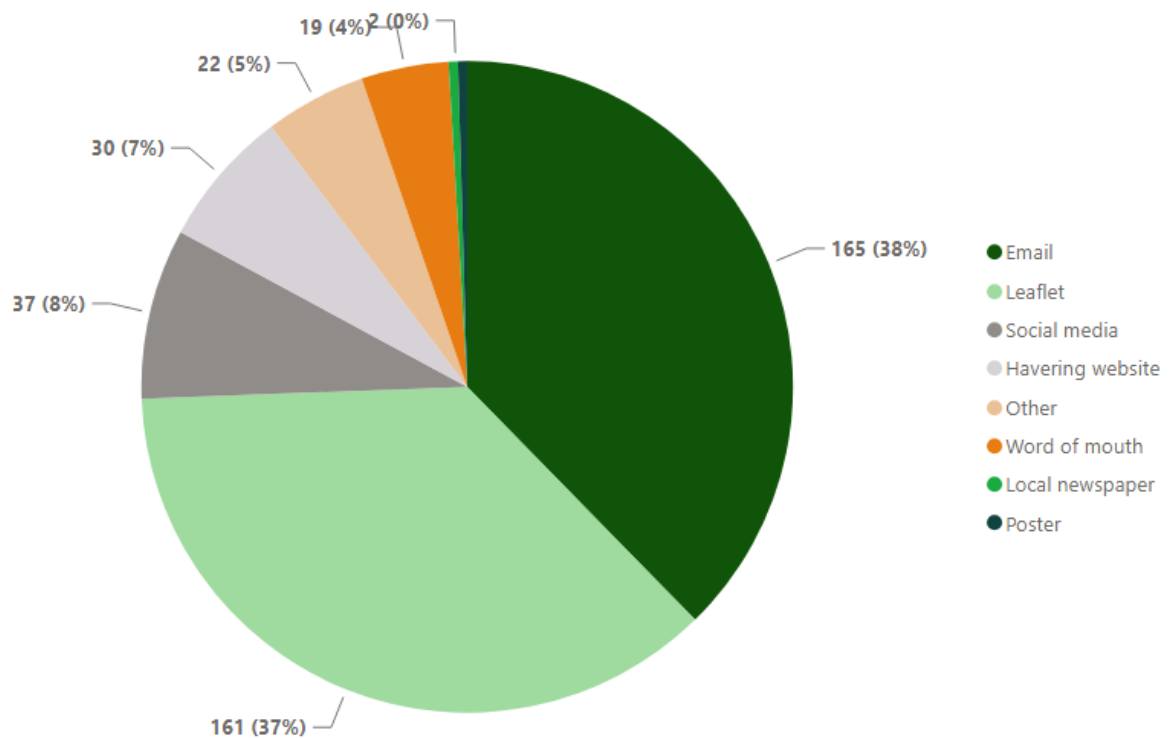


Respondents could optionally give information on the first part of their postcode, allowing for geographic analysis of responses. Of the **399** respondents who provided this information, the vast majority were Havering/London residents, though some responses came from further afield:



Respondents were also asked to give information about how they heard about the consultation. All **403** respondents answered this question, though more than one choice of answer was permitted, giving a larger total number of responses (**438**). An almost equal proportion of the responses listed email (**38** per cent of all responses from **41** per cent of respondents) or leaflet (**37** per cent of all responses from **40** per cent of respondents) as a channel by which respondents found the consultation. Another **8** per cent of responses (from **9** per cent of respondents) listed social media and **7** per cent of all responses (from **7** per cent of respondents) listed the Havering website. The remaining **10** per cent of all responses (from **11** per cent of respondents) listed other channels such as word of mouth, posters and local newspapers.

How did you hear about this consultation? *(More than one choice of answer permitted)*

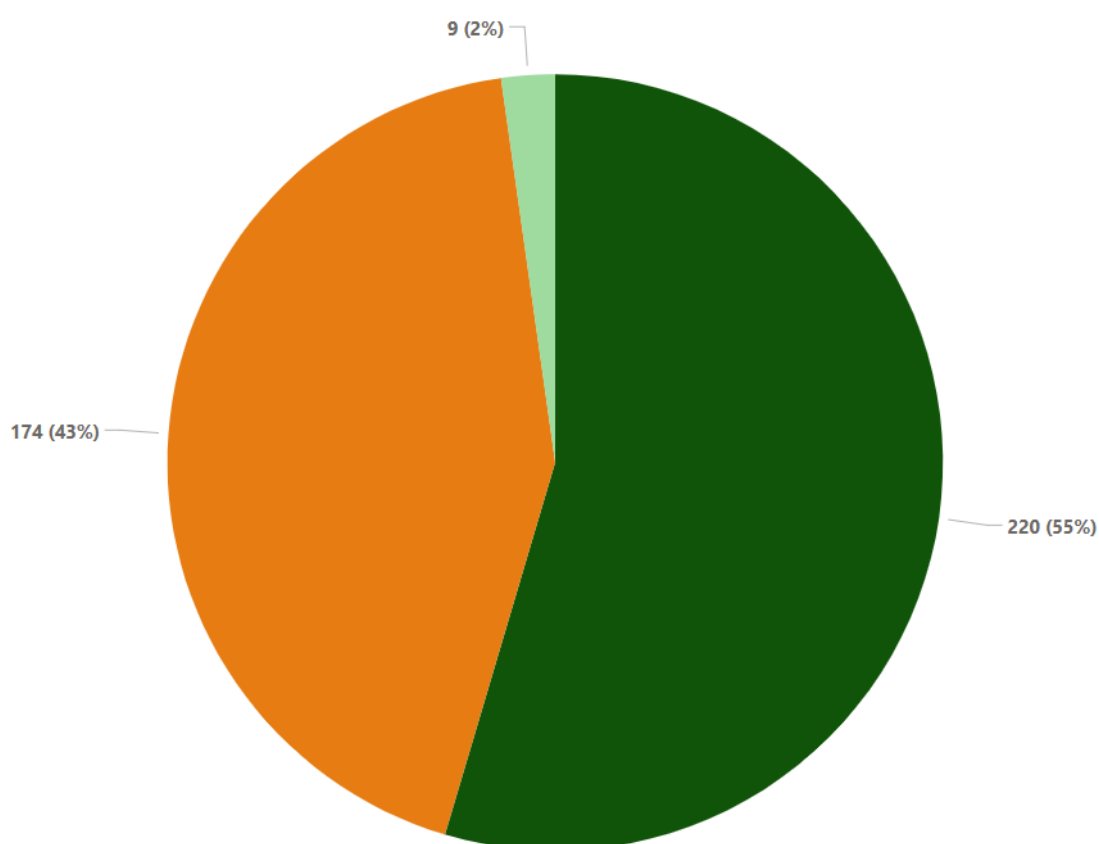


3.2 Stakeholders

All respondents to the consultation were categorised into the following stakeholder groups:

In what capacity are you responding to this survey?

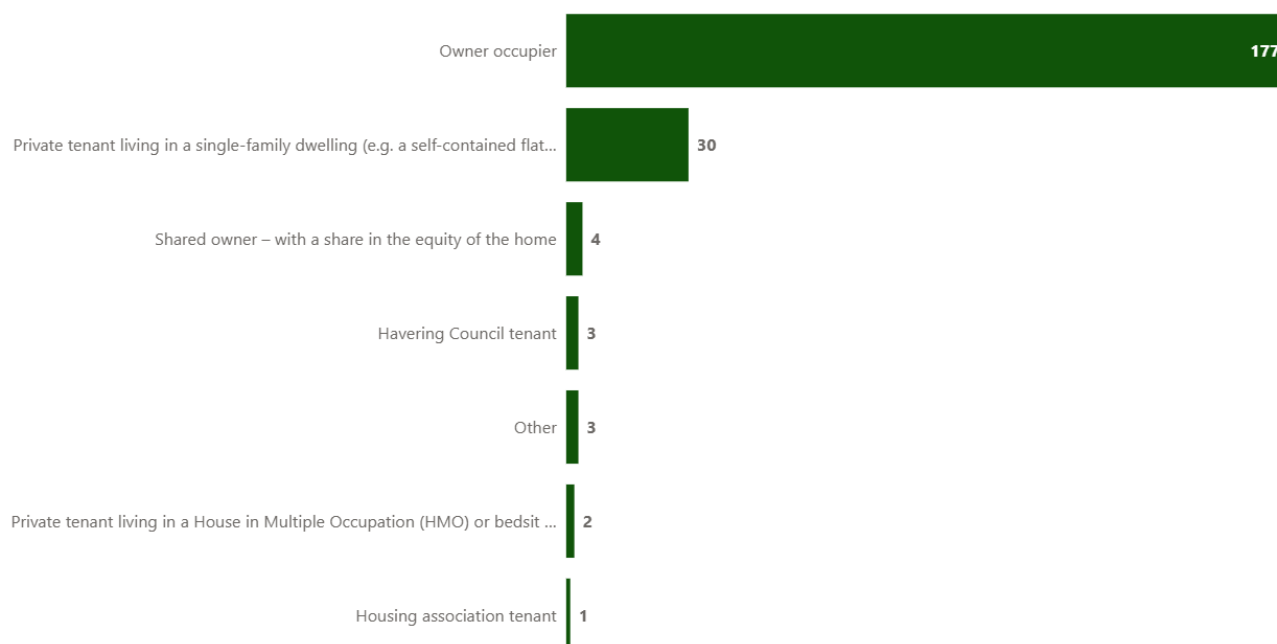
- As a Havering resident or local business (but not a landlord)
- As a landlord, letting or managing agent with properties in Havering
- As another type of stakeholder



Respondents who stated they were a Havering resident or local business, or a landlord, letting or managing agent were then asked which description would best describe them.

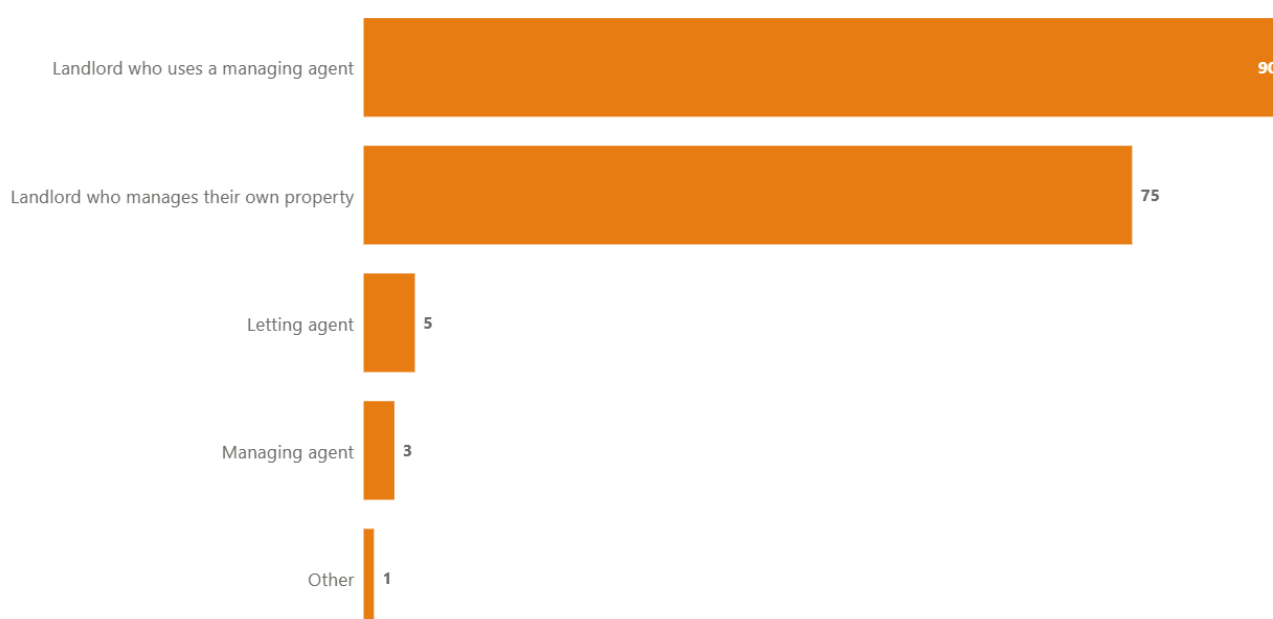
Of the **220** residents and local businesses who responded to this question, **181 (82 per cent)** said they were an owner occupier or shared owner, **32 (15 per cent)** said they were private tenants and **7 (3 per cent)** said they were another type of resident or local business.

If you are a resident living in Havering, or responding on behalf of a local business in Havering, which of the following best describes you?



Of the **174** landlords, letting or managing agents who responded to this question, **90 (52 per cent)** said they were a landlord who uses a managing agent, and **75 (43 per cent)** said they were a landlord who manages their own property.

If you are a landlord with properties in Havering, which of the following best describes you?



The **9** respondents who classified themselves as 'Another Type of Stakeholder' came from a range, including:

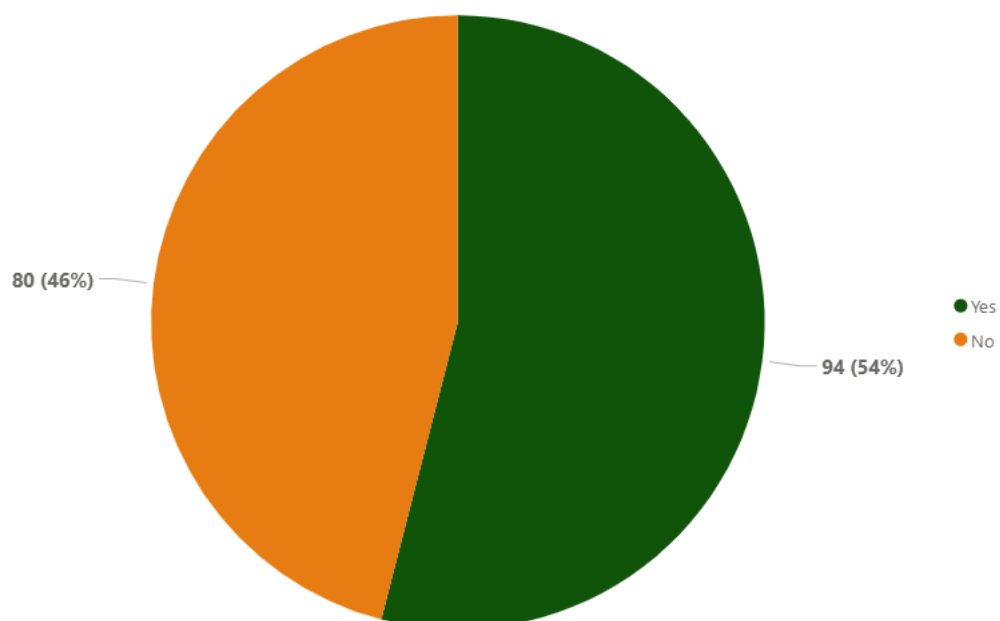
- A councillor representing the views of the people from a local ward in Havering
- A Private Renters' group covering Havering and other London boroughs
- A residents' group from Romford

The range of respondents to the consultation shows a good representation of views from different stakeholder groups.

Landlords' relationship to Havering

Landlords, letting or managing agents who responded to the consultation were asked if they lived in the London Borough of Havering. Of the **174** landlords, letting or managing agents who responded to this question, **94 (54 per cent)** said they lived in Havering, and **80 (46 per cent)** said they lived outside of Havering.

Do you live in Havering? *(Landlords & letting/managing agents)*

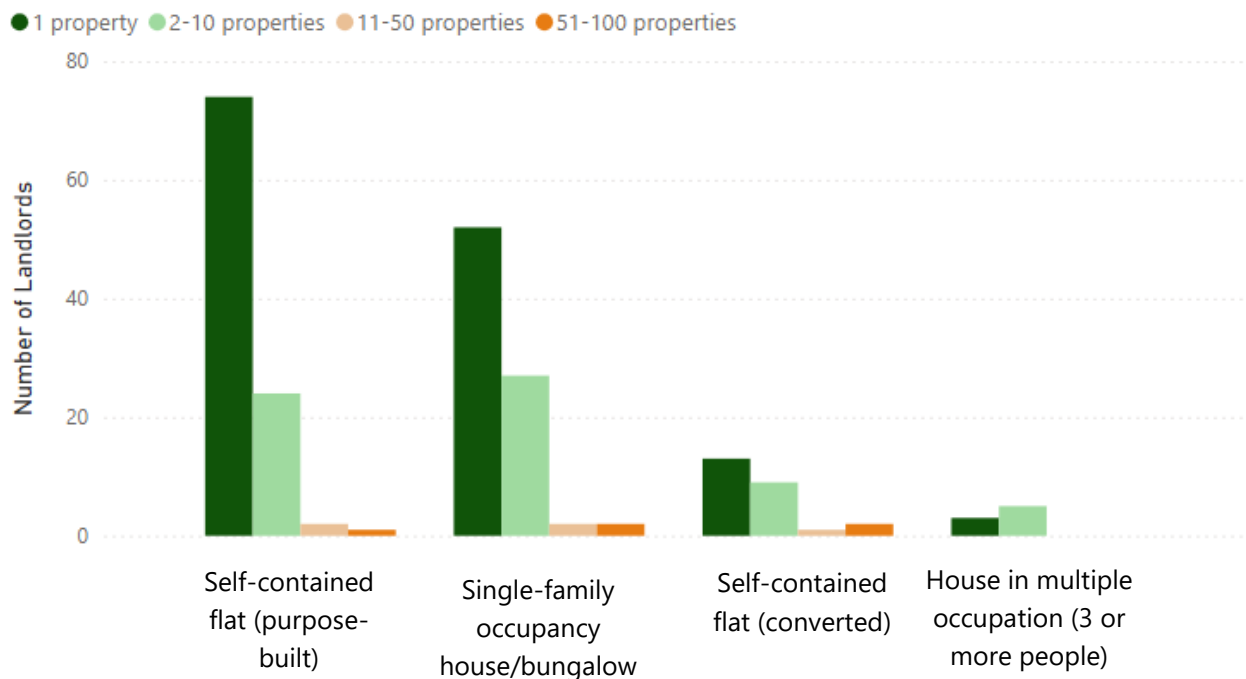


These results clearly indicate that the consultation reached landlords both within and outside the borough.

Types of property and length of ownership

Landlords, letting or managing agents were also asked about the types of properties they owned, and how long they had owned them. More landlords owned self-contained, purpose-built flats than other types of properties. The majority of landlords owned only one or a small number of properties and had done so for more than 10 years. However, a larger proportion of owner-occupiers than landlords had owned their properties for over 10 years.

Please indicate how many properties you own/manage in Havering, for each of the following types: (Landlords/letting agents)



How long have you owned property in Havering? (Owner-occupiers & Landlords/letting agents)

● Less than one year ● 1 - 2 years ● 3 - 5 years ● 6 - 10 years ● 10+ years

As an owner-occupier, how long have you owned property in Havering?



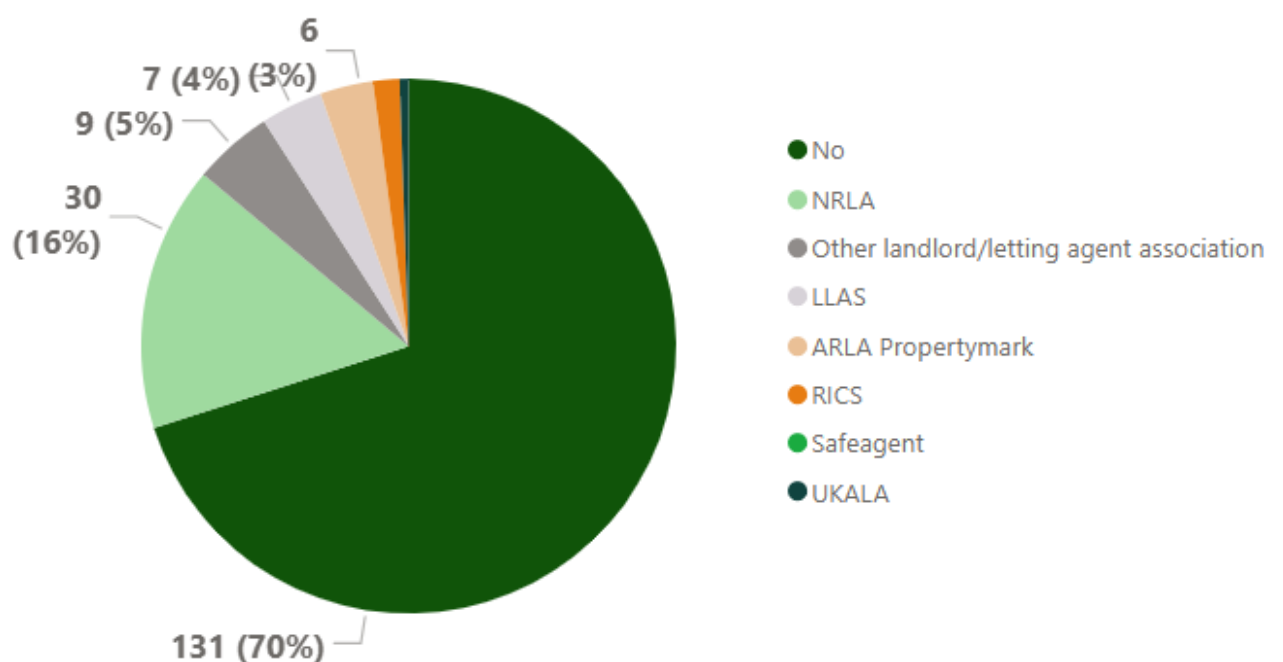
As a landlord, how long have you owned property in Havering?



Accreditation

Landlords, letting or managing agents were additionally asked whether they belonged to any accredited landlord schemes or were a member of any organisations. All landlords/letting agents (**174**) responded to this question but were allowed to indicate more than one option, giving a larger total number of responses (**187**). The majority of responses (**70** per cent of all responses from **75** per cent of respondents in this stakeholder group) indicated no accreditation with any of the listed schemes. The NRLA had the largest proportion of responses indicating membership (**16** per cent of all responses from **17** per cent of respondents in this stakeholder group).

Are you accredited or a member of any of the following organisations? (*Landlords/letting agents; more than one answer permitted*)



3.3 Views on the proposed selective licensing scheme

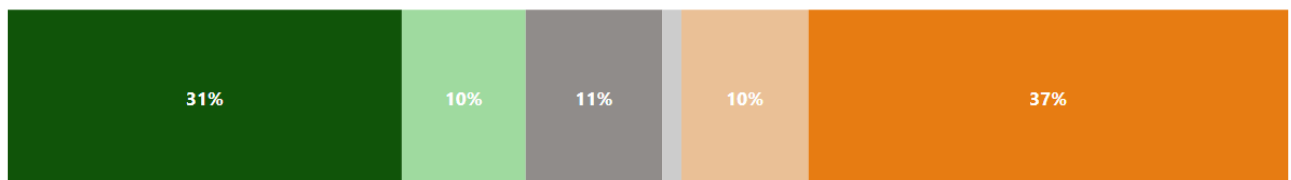
The Council is proposing to introduce one selective licensing designation which would apply to privately rented homes across the following seven wards based on the criteria of poor housing conditions:

- Beam Park
- Harold Wood
- Rainham & Wennington
- Rush Green & Crowlands
- Squirrels Heath
- St Albans
- St Edwards

All **403** respondents answered this question. A minority, **41** per cent, agree with the proposal for selective licensing and **47** per cent disagree.

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards?

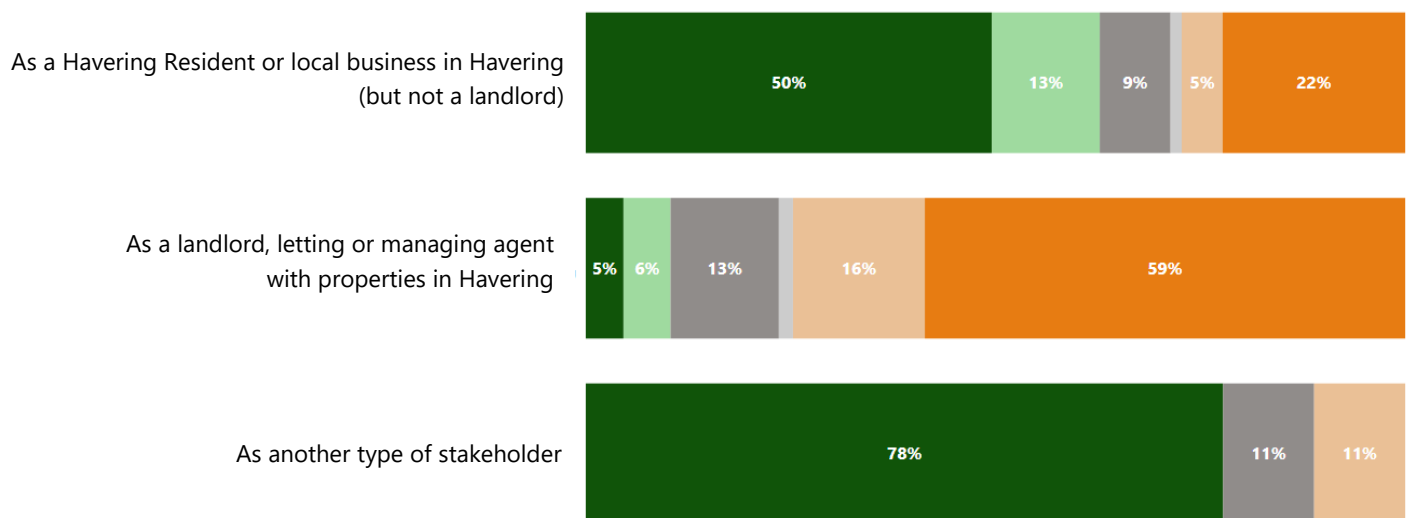
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Looking at the responses by group, landlords, letting and managing agents (*from 174 total responses*) are opposed to the proposal with approximately **75** per cent disagreeing. In contrast, other stakeholders are in favour of the proposal, with **63** per cent of residents or local businesses (*from 220 total responses*), and **78** per cent of other stakeholders (*from 9 total responses*) agreeing with the proposal.

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



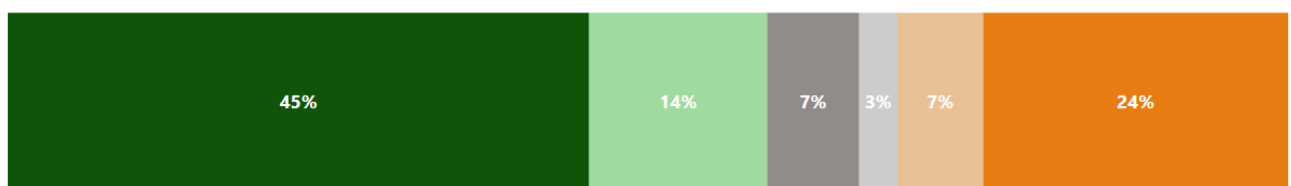
3.4 Views on the proposed additional HMO licensing scheme

The Council is proposing to introduce a borough-wide additional HMO licensing scheme. To understand the views on this proposal, respondents were asked about their opinions on this designation. This section covers the responses regarding the proposed additional HMO licensing scheme, which would apply to all smaller HMOs not currently subject to the mandatory HMO licensing scheme.

All 403 respondents who answered this question. A majority, **59** per cent of respondents, agree with the proposal for additional HMO licensing and **31** per cent disagree.

To what extent do you agree or disagree with the proposal for a borough-wide additional HMO licensing scheme?

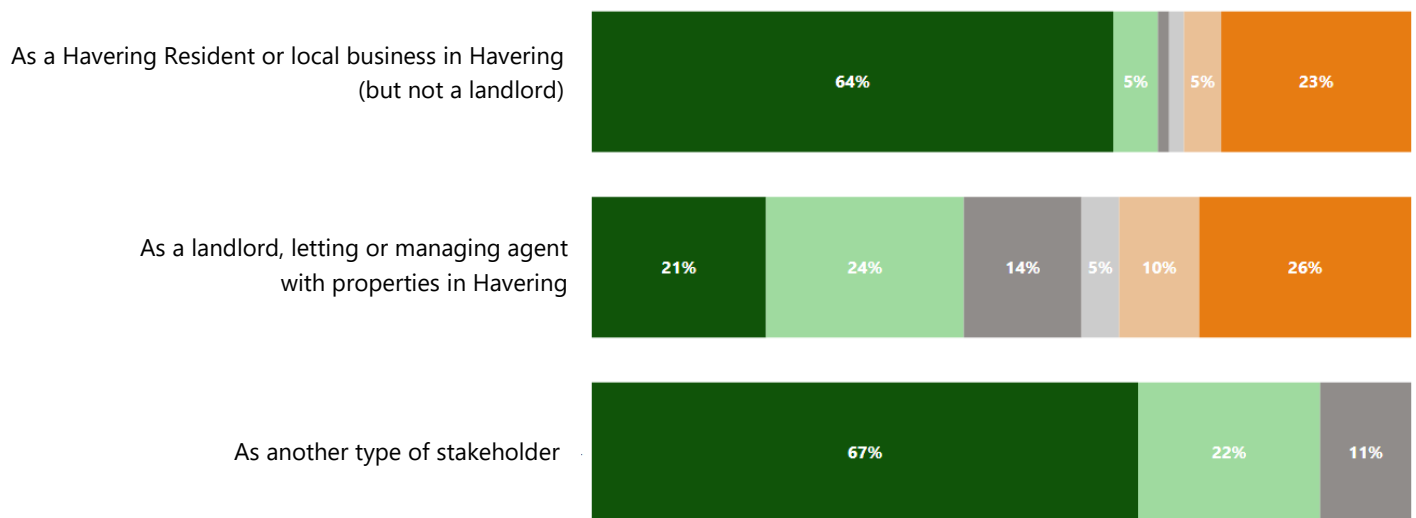
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Looking at the responses by group, all stakeholders are generally in favour of the proposal, with **69** per cent of residents or local businesses (*from 220 total responses*), **45** per cent of landlords, letting and managing agents (*from 174 total responses*), and **89** per cent of other stakeholders (*from 9 total responses*) agreeing.

To what extent do you agree or disagree with the proposal for a borough-wide additional HMO licensing scheme?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



3.5 Free text comments on the proposed schemes (for those in disagreement)

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licence schemes and if they had any further comments/considerations were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, seven major themes can be drawn out from the responses:

1. *Opposition to the scheme(s) as a whole:* many landlords and agents expressed strong disagreement with the proposed selective and/or additional HMO licensing schemes, viewing them as unnecessary, burdensome, and a way for the Council to generate revenue. They argued that existing laws and regulations are sufficient to address any issues with the property conditions and that the scheme unfairly penalises responsible landlords and will fail to remedy problems with rogue landlords.

"The selective licencing is a money making scheme for the council."

"This is a money making scheme... nobody benefits except the council."

"Landlord licences are nothing but another tax... it makes the property no safer at all."

"This sounds like a way the council is trying to make more money from landlords which I think is unfair to them."

2. *Concerns about increased costs and rents:* many landlords and agents expressed concerns that the licensing scheme will lead to increased costs, which will ultimately be passed on to tenants in the form of higher rents. They argued that this will exacerbate the already difficult housing shortage and make it more difficult for tenants to afford rental properties.

"The proposed £950 per property licensing fee is excessive... this cost will almost certainly be passed on to tenants."

"I just simply increase my rent to cover the cost of the licence which is worse for the tenant."

3. *Focus on targeting rogue landlords:* landlords suggested that instead of implementing a blanket licensing scheme, the Council should focus on targeting and penalising rogue landlords who are not complying with existing regulations. They argued that this would be a more effective approach to improving property conditions and protecting tenants and not penalise landlords who already have properties that meet high standards.

"The scheme imposes significant costs and administrative obligations on compliant landlords, penalising the majority for the actions of a few."

"Licensing schemes often penalise compliant landlords, while rogue landlords continue to operate under the radar."

4. *Utilise existing powers/legislation to target issues within the PRS:* some landlords and agents expressed that the current powers the Council has to tackle problems with poor property conditions and ASB are sufficient.

"Let's be clear: you do not fix enforcement failures by creating more red tape. You fix them by using the powers you already have — powers that councils consistently fail to exercise effectively."

"There is already a comprehensive legal framework in place... licensing merely duplicates existing legal requirements."

"Selective licensing is duplicative and punitive."

5. *Lack of faith in effectiveness of schemes and Council management:* some landlords and agents expressed scepticism about the Council's ability to effectively manage and enforce the licensing schemes. They cited examples of poor management of existing licensing schemes (both in Havering

and other boroughs) and lack of inspections as evidence that the scheme may not achieve its intended goals.

"Unless the council is willing to physically inspect every property, this scheme does not and will not make any difference."

"I have seen NO improvement/impact from the current scheme, which seems to be an additional money making exercise from a cash strapped council that doesn't care about any of its residents"

6. *Emphasis on the role of social housing:* several landlords highlighted the need for the Council to address issues with social housing, which they argued is often in poor condition and contributes to housing problems in the borough. They suggested that the Council should focus on improving its own housing stock before imposing additional regulations on private landlords

"You should worry about your own stock of social housing first and get those up to standard (and build thousands more) before picking on private landlords for non-HMO properties...If you built more social housing people would not need private rental so much."

"The questions that you are applying to landlords should apply to housing associations who are failing to maintain their properties, deal with anti-social behaviour, repairs and overcrowded properties with no recourse."

"Council should look to improve their standards first and lead by example. This just shows double standards."

7. *Licensing will drive landlords out:* several landlords expressed their concern that the schemes would force them to sell, thus reducing housing supply and making life more difficult for tenants.

"Will now sell our 2 one-bedroom flats at the earliest opportunity due to Havering Council's ridiculous bureaucracy..."

"This could contribute to the wider housing crisis by reducing the availability of rental properties."

"Landlords are selling up because they are fed up with more restrictions."

Residents/local businesses & other stakeholders

For residents/local businesses and other stakeholders, similar themes were evidenced, with a greater emphasis on increased costs for tenants:

1. *Concerns about increased costs:* many respondents expressed concerns that the proposed licensing scheme would lead to increased costs for landlords which would ultimately be passed on to tenants in the form of higher rents. They argued that this would exacerbate the already high cost of living in Havering.

"Landlords will pass any charges to the tenants..."

"All this scheme does is gives more money to the council and makes rents higher for tenants as the costs are always borne by the people downstream."

2. *Focus on enforcement and existing laws:* several respondents suggested that the Council should prioritise enforcing existing laws and regulations rather than implementing a new licensing scheme. They argued that there are already measures in place to address poor housing conditions and ASB and that the Council should focus on effectively enforcing these laws

"Rather than introducing additional licensing, I believe the council should focus on better enforcement of existing regulations. This could include more proactive inspections, targeted enforcement against known problem properties, and improved communication channels for tenants to report issues."

"The licensing scheme cannot change the behaviour of the landlords or tenants... Instead of increasing the regulation, the Council should enforce the existing laws. None of the Councils that introduced this kind of rules in the past have shown improvement in tackling antisocial behaviour or quality of private rented properties."

3. *Criticism of Havering Council's own housing management:* many respondents criticised Havering Council for not adequately maintaining its own social housing properties. They argued that the Council should address the issues within its own housing stock before targeting issues within the PRS

"The conditions of Havering council's own properties are appalling as published in the local press with conditions damp and mould. Perhaps get your own portfolio compliant first and set an example."

"Councils sold their housing stock and now some people are getting rich on that and the council are paying rent to the rich. It's a complete mess. The council should repossess and utilise any empty properties, poorly managed properties, sub-letting properties, drug growing properties (there is a lot of them) and any other way of building council house stock again."

4. *Impact on rental market and housing supply:* some respondents expressed concerns that the licensing scheme would discourage landlords from renting out their properties, leading to a decrease in the availability of rental housing. They argued that this would further worsen the housing crisis in Havering.

"This is an additional cost for landlords which they would pass on to their tenants. It would reduce the availability of private housing stock and limit the choices available to prospective tenants."

"Many good landlords have sold up, which means rents rise as a result. You put more pressure on the existing landlords, more will leave putting more pressure on council houses (which there are none)."

5. *Misconception that licensing will increase HMOs:* several respondents suggested that introducing an additional HMO licensing scheme will result in more HMOs being created, rather than regulating existing ones. This misconception has invited negative responses to the additional scheme from some residents.

"A bad idea by the Council to increase HMO in detriment to Havering residents."

"HMO's should be discouraged as they are detrimental to the area... Lots of people in an HMO do not pay their share of council tax compared to normal households but will all be using services."

"I am very strongly against HMO's in the borough, licensed or not. The council should be working to reduce the amount of HMO's in Havering."

"It will encourage more HMOs which isn't a good thing for Havering."

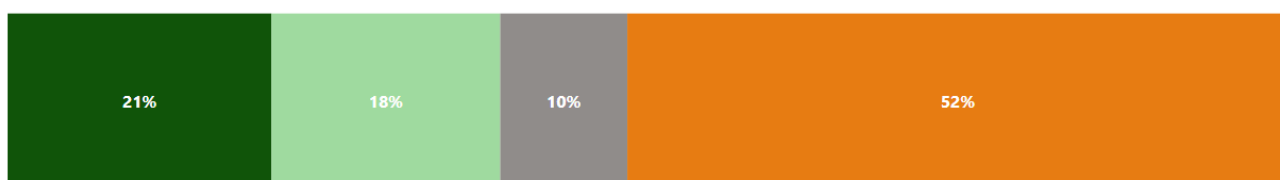
3.6 Views on the proposed selective licensing scheme fee

The consultation asked respondents for their views on the proposed licence fee for the proposed selective licensing scheme and additional HMO licensing scheme. Information about the proposed licence fees was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed selective licence fee of £950 for a five-year licence is.

What are your views on the proposed selective licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high

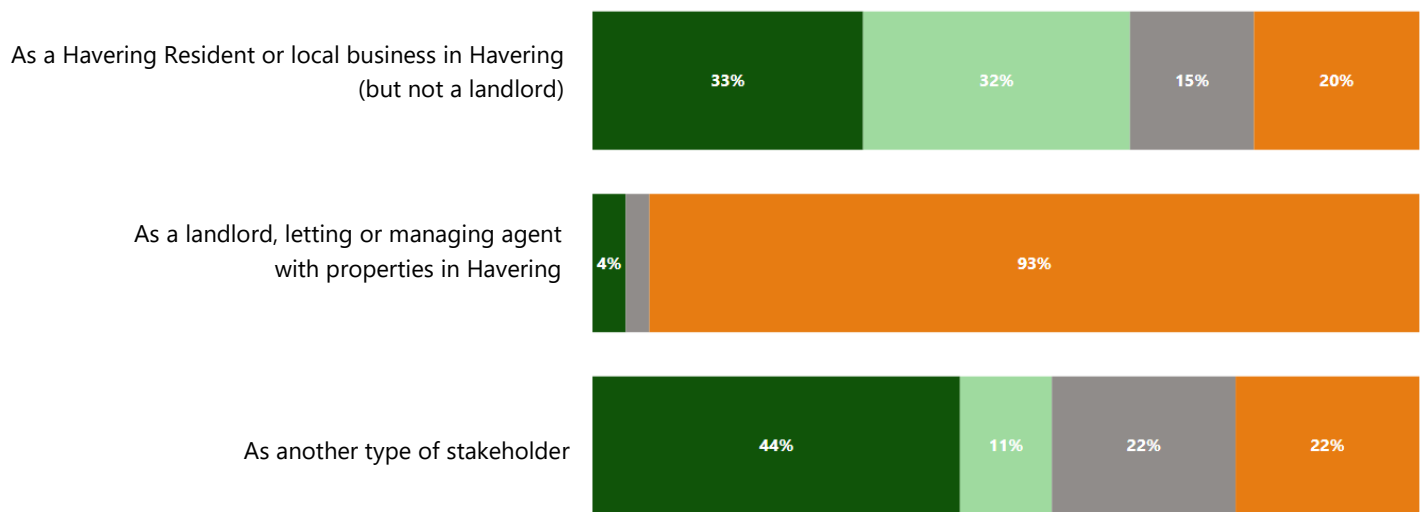


All **403** respondents answered this question. A majority of respondents, **52** per cent, said that they thought that the fee is too high, as opposed to **39** per cent who thought it was 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **93** per cent selecting this option; the other stakeholder groups had more positive responses with **65** per cent of residents or local businesses and **55** per cent of all other stakeholders responding that the fee is 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**20** and **22** percent respectively) responded that the fee is too high.

What are your views on the proposed selective licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high

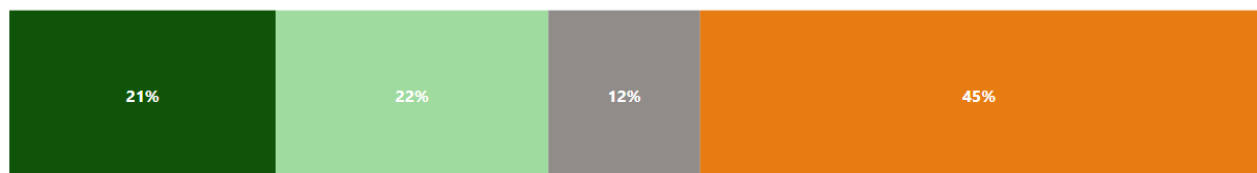


3.7 Views on the proposed additional HMO licensing scheme fees

Respondents were also asked how reasonable they feel the proposed additional HMO licence fee of £1400 for a five-year licence is.

What are your views on the proposed additional HMO licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high

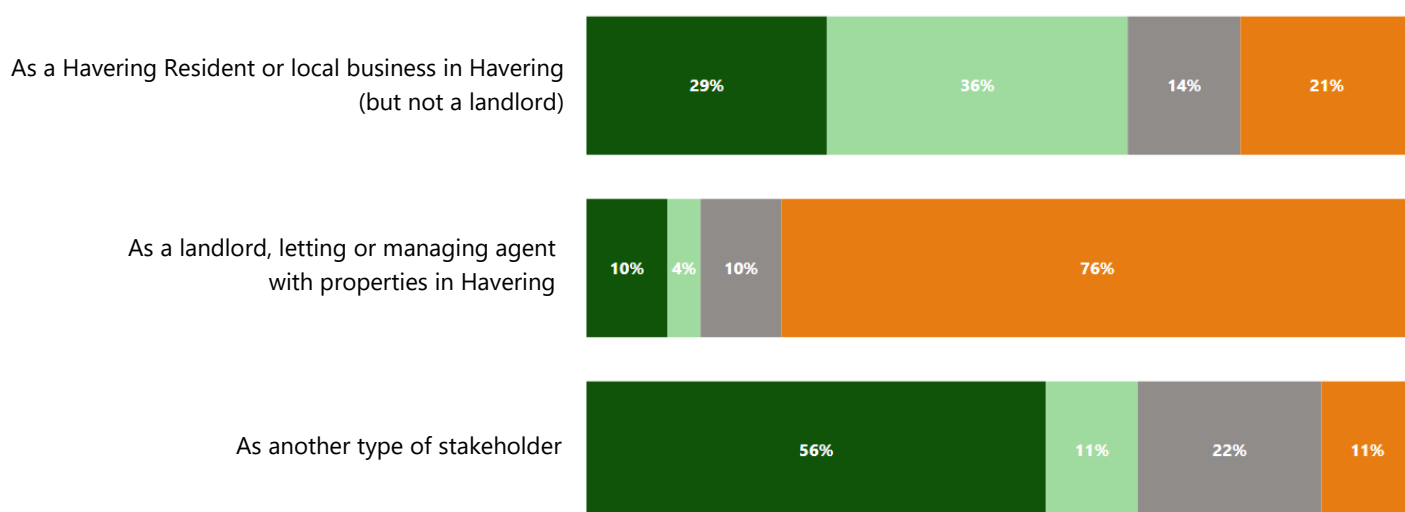


All **403** respondents answered this question. A majority of respondents, **45** per cent, said that they thought that the fee is too high. However, **43** per cent of respondents thought the fee was either 'about right' or too low.

Landlords, letting and managing agents were consistent in responding that the fee is too high, with **76** per cent selecting this option; the other stakeholder groups had more positive responses, with **65** per cent of residents or local businesses and **67** per cent of all other stakeholders responding that the fee is either 'about right' or too low. A smaller percentage from each of these two stakeholder groups (**21** and **11** percent respectively) responded that the fee is too high.

What are your views on the proposed additional HMO licensing fee?

● I think the fee is at about the right level ● I think the fee is too low ● Don't know ● I think the fee is too high



3.8 Views on the proposed licensing scheme discounts

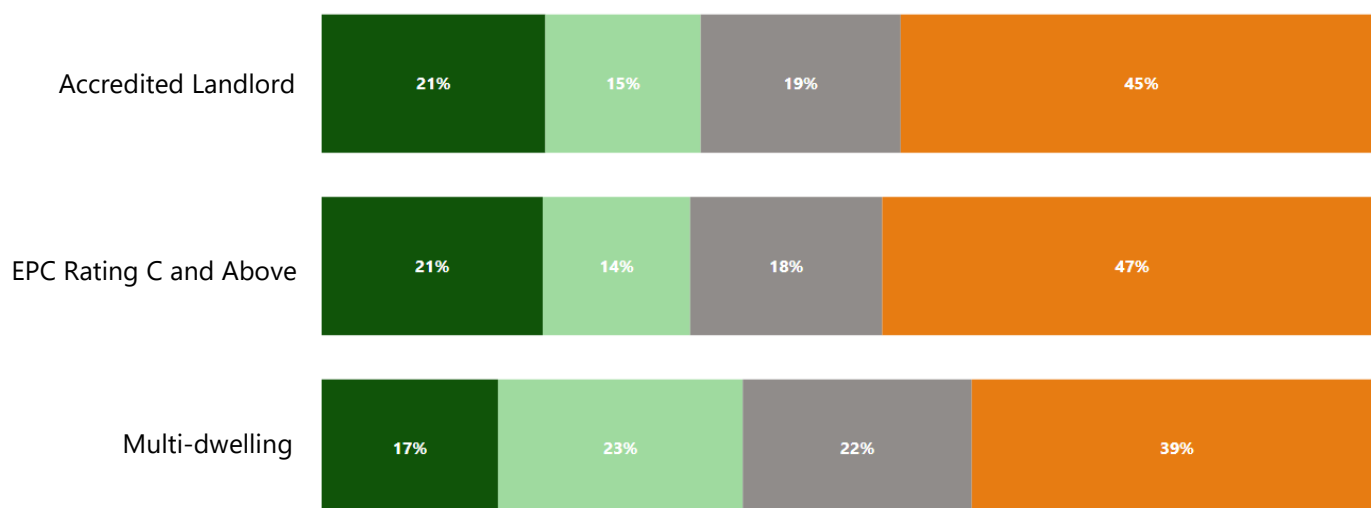
During this consultation, the Council proposed three separate discounts. The discounts proposed were accredited landlord, energy performance certificate (EPC) rating (C and above), and multi-dwelling. Proposed discounts are applicable to both selective and additional HMO applications.

Nature of discount	Amount (Selective)	Amount (Additional)
Accredited landlord	£100 off Part B	£100 off Part B
EPC C and above rating	£75 off Part B	£75 off Part B
Multi-dwelling	£100 off Part A	£100 off Part A

The consultation asked respondents for their views on each of the proposed licence fee discounts. Information about the proposed licence fee discounts was provided within the consultation documents.

What are your views on the proposed discounts?

● I think the discount is at about the right level ● I think the discount is too high ● Don't know ● I think the discount is too low



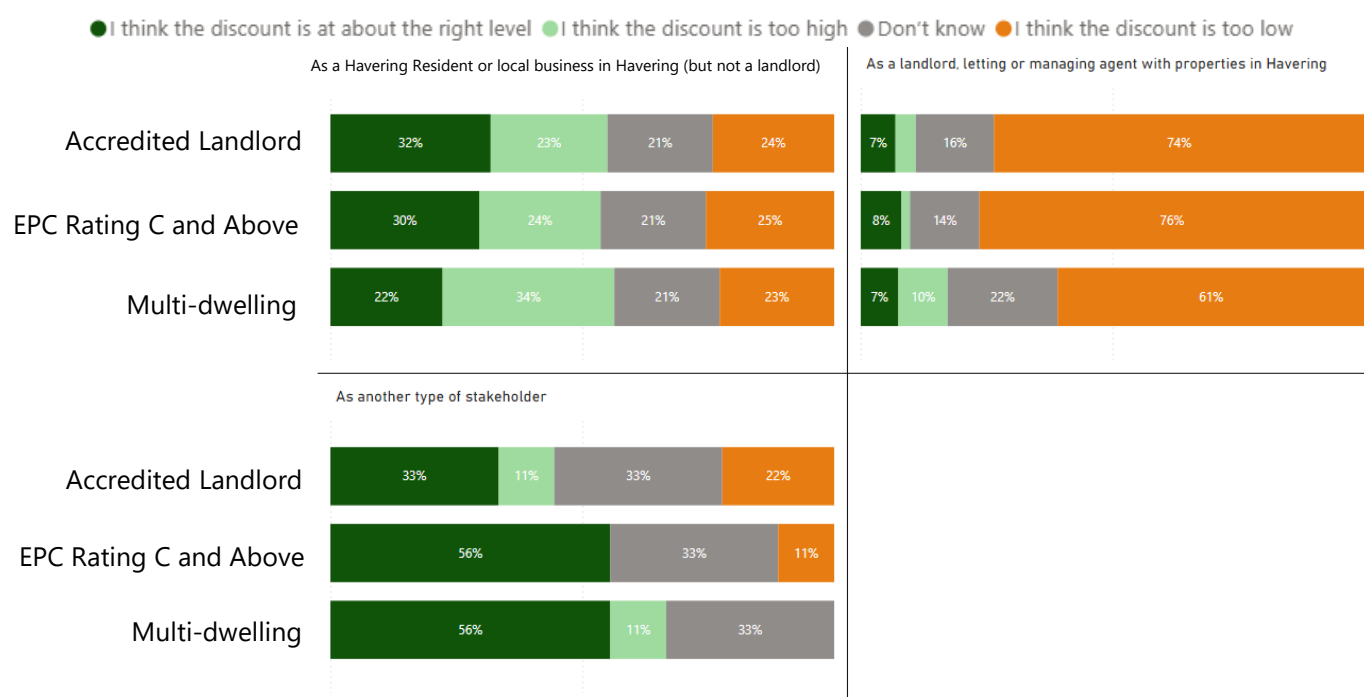
All **403** respondents shared their views on these discounts. **45** and **47** per cent respectively stated that the Accredited Landlord and EPC and discounts were too low. For the multi-dwelling discount **39** per cent stated that they felt it was too low, but **40** per cent thought it was either about the right level or too high. Around **20** per cent of respondents in each case said they didn't know.

Looking at the results by stakeholder group, around **75** per cent of landlords, letting and managing agents viewed the accredited landlord and EPC discounts as too low. When considering the multi-dwelling discount, a slightly lower proportion, **61** per cent, viewed the discount as too low.

Residents or local businesses views on the discounts are more positive, with over **50** per cent stating they viewed the accredited landlord, EPC multi-dwelling discounts as about the right level or too high, with only around **25** per cent viewing them as too low.

The responses of other stakeholders were more mixed for the Accredited landlord discount, with **44** per cent saying they were about the right level or too high, **33** per cent responding, 'don't know', and **22** per cent saying they were too low. Views on the EPC and multi-dwelling discounts were more favourable, with the majority, **56** per cent, saying they were about the right level.

What are your views on the proposed discounts?



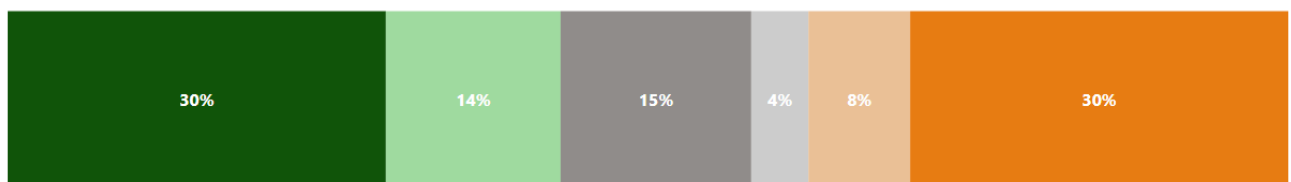
3.9 Views on the proposed selective licensing scheme conditions

The consultation asked respondents for their views on the proposed selective licence conditions. Information about the licence conditions was provided within the consultation documents.

All **403** respondents answered this question. A majority of respondents, **44** per cent, agreed with the proposed licence conditions, while **38** per cent of respondents agreed.

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?

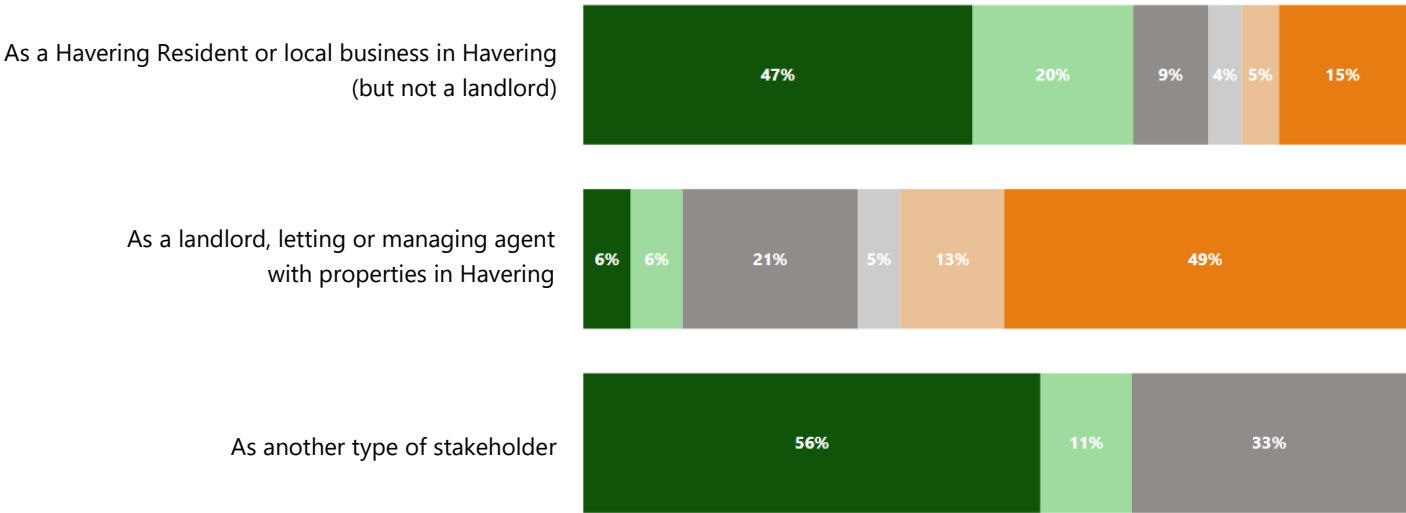
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **67** per cent, of each group agreeing, whereas landlords, letting and managing agents are opposed, with **62** per cent disagreeing with the selective licensing conditions.

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Free text comments regarding the selective licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed selective licence conditions were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, several themes emerged, but especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. *Excessive burden:* landlords voiced strong concerns that the selective licensing conditions impose unnecessary financial and administrative burdens. They argue that many of the proposed conditions duplicate existing legal requirements, increase compliance costs, and penalise responsible landlords. This, they fear, could lead to higher rents, reduced housing supply, and discourage participation in the PRS.

"For the reasons already given I do not believe that selective licencing is appropriate or warranted given existing legislation. All major conditions are covered by legislation and the discretionary conditions listed are essentially micro managing landlords and simply adding layers of bureaucracy and therefore cost to the private rental sector."

"Some landlords own small properties and this will be an additional burden."

2. *Focus on existing regulations:* several landlords argued that the proposed conditions largely overlap with existing regulations and requirements. They believed that enforcing and ensuring compliance with these existing regulations would be more effective than introducing new licensing conditions.

"There are already regulations in place and minimums to achieve. Regulation without enforcement is pointless. Enforcing existing rules and regulations may be a better starting point and less onerous for bona fide landlords who already provide properties of a high standard."

"Discretionary conditions often duplicate national laws."

"Discretionary conditions risk overregulation without clear benefit."

3. *Impact on rents:* landlords expressed concerns that the additional costs associated with meeting the selective licensing conditions will ultimately be passed on to tenants in the form of higher rents. They believed that this will further exacerbate the affordability crisis in the rental market.

"While I understand the intention behind the policy, introducing additional costs to landlords will likely result in these expenses being passed on to tenants through higher rents."

"My main concern is that this additional licensing imposes extra costs on responsible landlords who are already managing standard single-family homes. These costs will likely be passed on to tenants in the form of higher rent, which could worsen affordability and increase financial pressure on local residents."

Residents/local businesses and other stakeholders

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants and that added requirements could lead to increases in rent and decrease in supply.

1. *Focus on existing regulations:* respondents expressed their disagreement, in many cases questioning the need for additional regulations and suggested that existing laws and enforcement should be sufficient.

"The council should focus on enforcing existing laws rather than introducing more regulations that affect good landlords and increase rental costs for tenants."

"There is no need for licensing scheme in the additional wards as the landlords are already responsible and bound by contracts with tenants. The contract has all the required conditions needed to safeguard the tenants."

2. *Impact on tenants:* several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations

"The landlords just pass on the costs so you're harming local people."

"It increases costs for landlords, as well as increases cost of renting for tenants, whilst it reduces the amount of available private properties and fewer landlords."

3. *Property standards and maintenance:* several respondents noted that there should be added conditions relating landlords' responsibilities to upkeep both the inside and outside of their properties

"There should be a condition that landlords are responsive to fixing issues reported by tenants... Regular mould assessments should also be mandatory, in addition to gas and fire safety."

"Making sure the property is well kept and maintained."

"It should include damp and managing outdoor spaces. Trees and large shrubs need professional management... Tidy refuse areas too."

Respondents were also asked whether they felt that there were any other licence conditions (not already covered under the mandatory or proposed discretionary selective licence conditions) that they thought should be included. Most respondents either did not know or thought that there were not, but those who answered, 'Yes' (**11** per cent) were invited to say what conditions they thought should be added.

Are there any other selective licence conditions *(that are not already covered by a mandatory or proposed discretionary licence condition)* **that you think should be included?**

● Yes ● Don't know ● No



Suggested extra selective licence conditions		
1.	Vehicle and parking management	<p>Landlords must manage and limit the number of vehicles associated with a property, especially in areas with high vehicle ownership or permit parking. This includes:</p> <ul style="list-style-type: none"> • Restrictions on vehicle repairs and sales outside properties • Monitoring multiple vehicle ownership per household
2.	Landlord Registry and data accuracy	<p>Landlord information must be updated annually via the Land Registry to ensure accurate contact and ownership records</p>

3.10 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licence conditions. Information about the licence conditions was provided within the consultation documents.

To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree

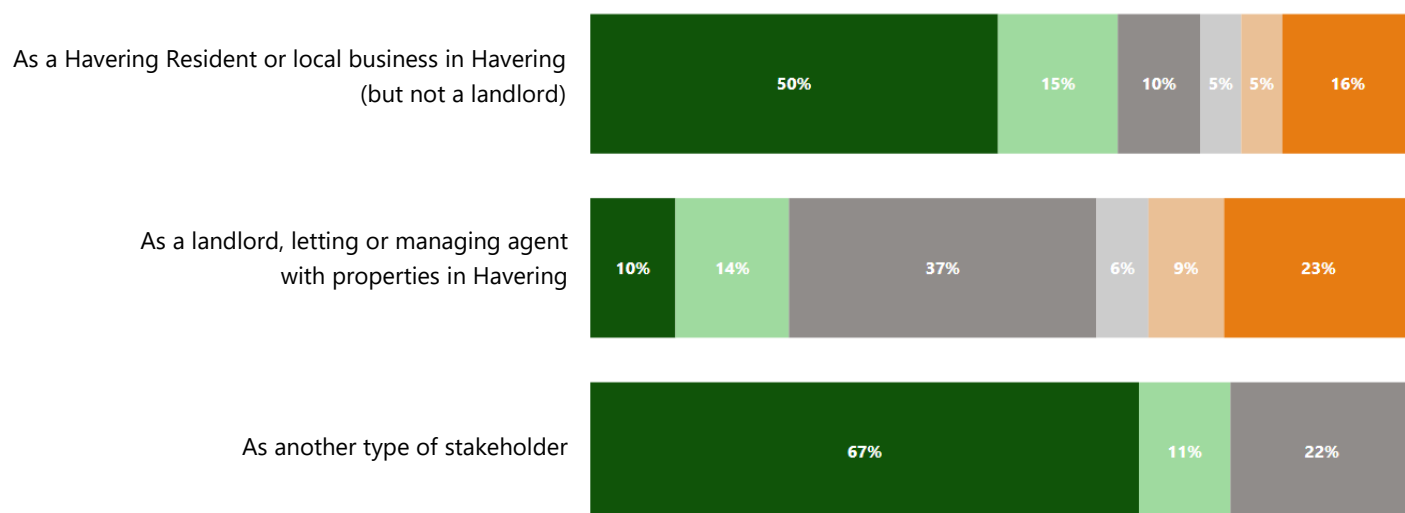


All **403** respondents answered this question. A majority of respondents, **47** per cent, agreed with the proposed additional HMO licence conditions, while **26** per cent of respondents disagreed. A proportion of respondents **27** per cent, neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **65** per cent and **77** per cent of each group respectively, agreeing with the additional HMO licensing conditions. Landlords, letting and managing agents had more mixed views, with **32** per cent disagreeing, **24** per cent agreeing with the additional HMO licensing conditions, and **43** per cent saying they neither agreed nor disagreed, or didn't know.

To what extent do you agree or disagree with the proposed additional HMO discretionary licensing conditions?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Free text comments regarding the additional HMO licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed additional HMO licence conditions were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

For landlords/agents, several themes emerged, all of which were similar to those expressed when asked about the selective licence conditions, especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. *Excessive burden*: many landlords and agents argue that the proposed additional HMO licensing conditions are excessive, place an unfair burden on responsible landlords (and in certain cases should be the responsibility of the tenant) and should not go further than national law.

"The objectives of additional HMO are already being achieved without any issues."

"These conditions are excessive and disproportionate."

"There are laws in place already, they just need to be enforced. Which is a police issue not a landlord issue. Bad landlords will always be bad landlords."

2. *Focus on existing regulations*: many landlords argued that the proposed additional HMO licensing conditions largely overlap with existing regulations and requirements, often stating that the current regulations are already too strict. They believed that enforcing and ensuring compliance with these existing regulations would be more effective than introducing new licensing conditions.

"The sector is already over regulated...Nothing will improve until there is better rental property supply, and regulation and taxation are currently forcing private residential landlords to sell up and do something else with their money."

"There is already legislation in force to deal with the majority of the discretionary conditions, we do not need more unnecessary compliance requirements on the sector."

"I believe these requirements are already in place. Whichever council department or other agency has responsibility for ensuring compliance should already be dealing with this and if they aren't they should be held to account."

"Councils already have the authority to enforce these standards, and the emphasis should be on using that power effectively."

3. *Impact on rents and supply:* landlords expressed concerns that the additional costs associated with meeting the licensing conditions will ultimately reduce the supply of PRS properties and be passed on to tenants in the form of higher rents. They believed that this will further exacerbate the affordability crisis in the rental market.

"The introduction will lead to increase in rent in the Borough and drive more people into claiming benefits."

"Adding yet more conditions risks: [...] Driving up costs, which are ultimately passed on to tenants in the form of higher rents."

4. *Targeting bad landlords:* some landlords suggested that instead of imposing licensing conditions on all landlords, the focus should be on targeting and penalising landlords who are providing inadequate housing or failing to meet their responsibilities. They believed that this targeted approach would be more effective in improving housing standards.

"Instead of broad and discretionary conditions, I recommend a focus on: Clear, evidence-based minimum standards; Proportionate regulation based on the size and risk profile of the property; Targeted enforcement against landlords who have a history of poor management or non-compliance."

"Landlords shouldn't have to pay to prove they're complying with the rules—compliance should be monitored through routine checks and proper oversight, not additional fees."

Residents/local businesses and other stakeholders

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants, and further comments on the mistaken assumption that an additional HMO licensing scheme would increase the number of HMOs in the borough.

1. *Focus on existing regulations:* respondents expressed their disagreement, citing concerns about increased costs for landlords and potential rent increases for tenants. They questioned the need for additional regulations and suggested that existing laws and enforcement should be sufficient.

"I also disagree with the proposed discretionary conditions because they often duplicate existing legal requirements, creating unnecessary complexity and scope for inconsistency."

"Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants."

"This is just a scheme to increase funds, and doesn't help people."

"Unless it is mandatory, HMO landlords will not be obliged to follow the law to ensure they provide safe and good accommodation for private tenants. The tenants need to also be vetted properly. The council needs to put more checks and stringent rules in place to monitor the current state of HMO and ensure it is enforced, hence discretionary measures or rules will not work nor will there be an incentive to enforce them."

2. *Impact on tenants:* several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations.

"I believe these measures are overly restrictive and risk doing more harm than good. Imposing additional, locally defined standards—beyond what is already required under national HMO licensing—adds unnecessary complexity and cost for responsible landlords. These discretionary conditions... may discourage investment in HMOs, reduce available accommodation for lower-income tenants, and ultimately push more people into overcrowded or informal living situations. Rather than improving quality, these extra conditions may price out both landlords and tenants, undermining housing access in the borough."

"It increases costs for landlords, as well as increases cost of renting for tenants, whilst it reduces the amount of available private properties and fewer landlords."

3. *Misconception that licensing will increase HMOs:* several respondents suggested that introducing an additional HMO licensing scheme would result in more HMOs being created, rather than regulating existing ones. They highlighted their concerns about living in close proximity to HMOs and implied a preferred emphasis on HMO planning regulation as opposed to more licensing conditions.

"Drug use, overcrowding, noise at night time is our new normal living next door to HMO property."

"Safety walking the streets is a concern. Neighbours in the street should be consulted before a HMO is approved."

"I believe that HMOs should not be allowed in residential areas... I am worried that HMOs will be popping up all over our streets creating issues for residents who have owned properties in this area for many years."

"There are too many HMOs already... Antisocial behaviour is increasing and residents who have lived here all their lives are being forced out by this!"

Respondents were also asked whether they felt that there were any other licence conditions (not already covered under the mandatory or proposed discretionary additional HMO licence conditions) that they thought should be included. Most respondents thought that there were not, but those who answered, 'Yes' (**24** per cent) were invited to say what conditions they thought should be added.

Are there any other additional HMO licence conditions *(that are not already covered by a mandatory or proposed discretionary licence condition)* **that you think should be included?**

● Yes ● Don't know ● No



Suggested extra additional HMO licence conditions

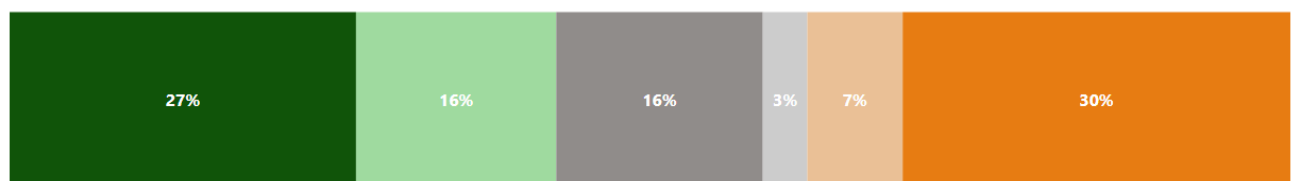
Tenant vetting and behavioural standards	Require landlords to conduct criminal background checks and vet tenants for suitability. Tenants must sign behavioural agreements covering anti-social behaviour, noise, cleanliness, and respect for neighbours.
Parking and vehicle restrictions	Limit the number of vehicles per property. Tenants must not repair or sell vehicles from the premises. Consider implementing parking control zones in HMO-dense areas.

3.11 Views on the proposed licensing scheme objectives

The consultation asked respondents for their views on the proposed licensing scheme objectives. Information about the licensing scheme objectives was provided within the consultation documents.

To what extent do you agree or disagree with the proposed licensing scheme objectives?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree

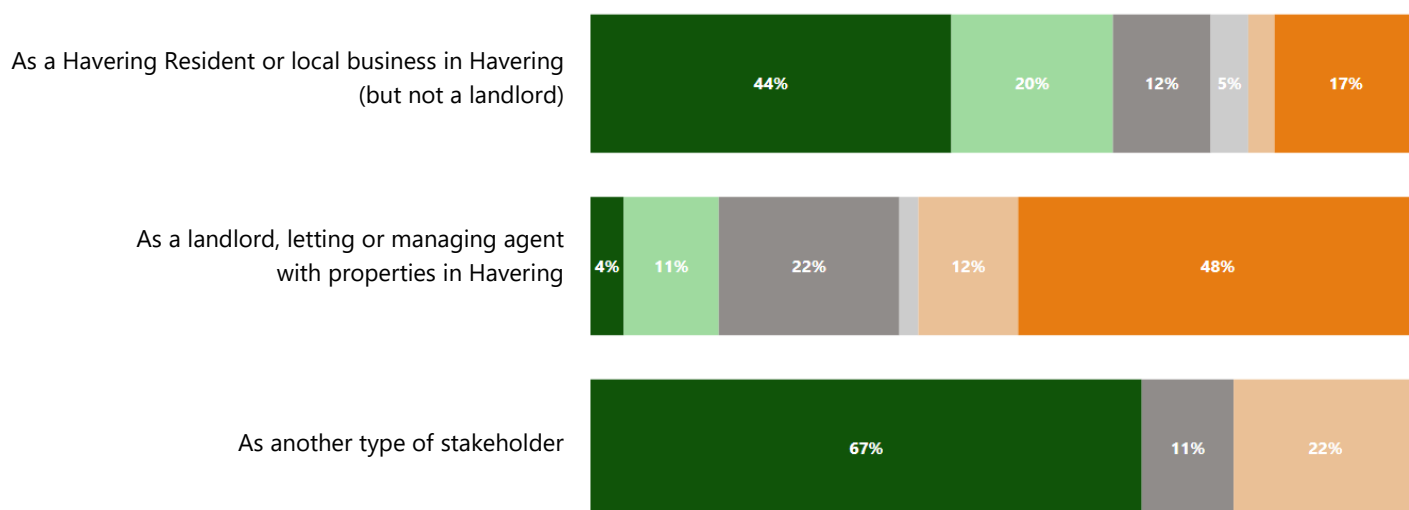


All **403** respondents answered this question. A slight majority of respondents, **43** per cent, agreed with the proposed licensing scheme objectives, while **37** per cent of respondents disagreed. A proportion of respondents, nearly **20** per cent, said they neither agreed nor disagreed or didn't know.

Looking at the responses by stakeholder group, residents or local businesses and other stakeholders are in favour, with the majority, **64** per cent and **67** per cent of each group respectively, agreeing with the licensing scheme objectives. Landlords, letting and managing agents were largely opposed, with the majority, **60** per cent, disagreeing.

To what extent do you agree or disagree with the proposed licensing scheme objectives?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



Free text comments regarding the licence objectives

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licence objectives were analysed. The analysis looked at the responses by stakeholder type. As the 'other stakeholders' group was relatively small (at 9 respondents in total), this has not been looked at separately, but comments have been incorporated into the residents/local businesses group.

Landlords/agents

Landlords/agents were broadly negative towards the licensing scheme objectives. Many argued that existing laws already cover the scheme's objectives, and that enforcement—not new fees—is what's needed. There was scepticism about the Council's ability to achieve the objectives it has set out to achieve.

1. Ineffectiveness of licensing scheme: there is scepticism about whether the licensing scheme will actually achieve its stated goals, with concerns that it is more symbolic than impactful.

"Licensing does not improve poverty, anti-social behaviour, nor crime in an area."

"Unless the objectives are met, which needs to be monitored, there is actually no point to this."

"Licensing schemes often fail to target the actual problem properties, instead burdening compliant landlords with paperwork and fees."

2. *Existing regulations are sufficient:* landlords argue that the objectives of the licensing scheme can already be achieved through existing laws and enforcement mechanisms, making the scheme redundant.

"The necessary legal tools and enforcement powers already exist, yet they are not being consistently or effectively used."

Residents, local businesses and other stakeholders

Many residents, local businesses, and other stakeholders agreed with the intentions behind the licensing objectives, but they expressed doubts about the scheme's ability to deliver these outcomes. The most common concerns included the lack of enforcement and monitoring, which undermined confidence in achieving the objectives. Additionally, there was scepticism about the Council's capacity to manage the scheme effectively.

1. *Enforcement and effectiveness concerns:* there is scepticism about whether the Council will effectively enforce the scheme or achieve its stated objectives.

"I agree that they are good objectives but I don't believe you will actually achieve them because you don't actually bother to inspect or enforce..."

"I agree with the objectives but don't see how the licensing scheme will achieve them unless properties are properly monitored."

2. *Council capability and resource issues:* stakeholders express doubts about the Council's ability to manage the scheme due to staffing, funding, and operational limitations.

"Objectives will be set but never followed through – too busy, not enough staff etc."

"Once again highlighting council's inability to manage their workload... lack of funding... lack of staff and facilitation... unrealistic expectations will not be met... the council cannot cope with this level of requirement and management ongoing."

Respondents were also asked whether they felt that there were any other licence scheme objectives (not already covered by the objectives listed) that they thought should be included. Most respondents thought either that there were not, or that they didn't know, but those who answered, 'Yes' (8 per cent) were invited to say what objectives they thought should be added.

Are there any other licence scheme objectives *(that are not already covered by the objectives listed)* **that you think should be included?**

● Yes ● Don't know ● No



Suggested extra licensing objectives	
Ensure licensing schemes deliver real impact	Licensing should not be a bureaucratic exercise or financial burden without tangible benefits. The scheme must lead to genuine improvements in housing standards and tenant wellbeing.
Support responsible landlords	Reward landlords who consistently comply with regulations through reduced fees or exemptions and provide access to a dedicated support team for tenant and property management.
Improve communication and feedback	Share regular updates and performance reports with landlords to foster transparency and help them stay informed about scheme developments and compliance deadlines.
Use licensing data proactively	Use scheme databases to alert landlords about upcoming certificate expirations (e.g., gas safety, electrical checks), helping them maintain compliance

3.12 Views on issues in Havering's PRS

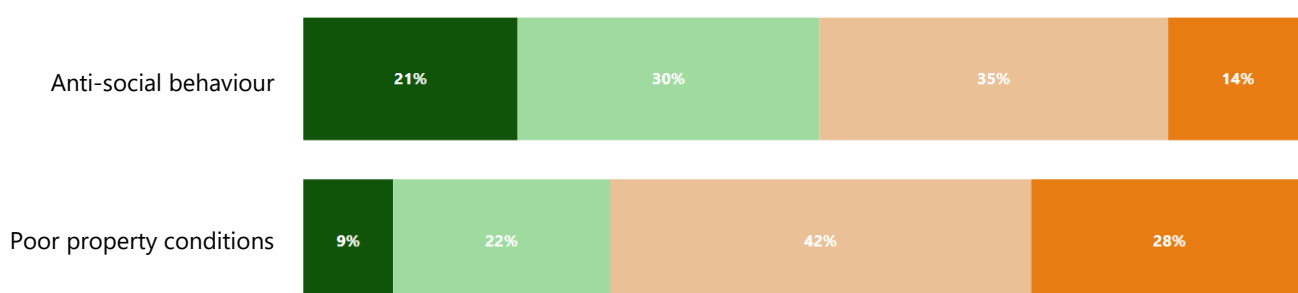
Respondents to the survey were asked their opinion of issues relating to poor property conditions and ASB in private rented properties in the borough.

Respondents were asked to what extent they believed that poor property conditions and ASB are problems in their local area of Havering.

All **403** respondents answered this question.

To what extent do you believe each of the following to be a problem in your local area of Havering?

● A very big problem ● A fairly big problem ● Not a very big problem ● Not a problem at all



Anti-social behaviour (ASB)

A majority of respondents, **51** per cent, believed that ASB was a fairly big or a very big problem, whereas **49** per cent, stated that they believed it was not a very big problem or not a problem at all.

When looking at the responses by stakeholder group, as can be seen in the graphs below, there is polarity between landlords, letting and managing agents, and residents or local businesses and other stakeholders; where only **38** per cent of landlords, letting and managing agents viewed ASB as a fairly big or very big problem, in contrast, **61** per cent of residents or local businesses and **66** per cent of other stakeholders viewed it as a fairly big or a very big problem.

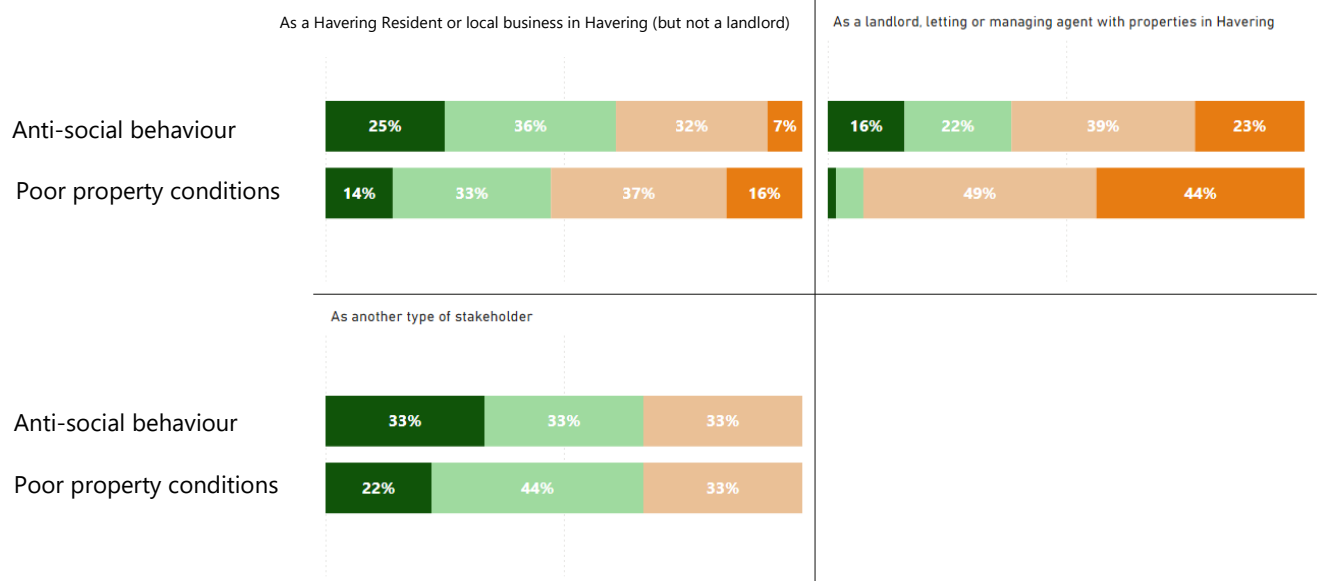
Poor property conditions

70 per cent of respondents thought that poor property conditions were not a very big problem or not a problem at all, as opposed to **31** per cent who thought they were fairly big or a very big problem.

There is also some disparity between the views of landlords, letting and managing agents and those of residents or businesses and other stakeholders when considering poor property conditions; where **93** per cent of landlords, letting and managing agents viewed poor property conditions as not a very big problem or not a problem at all, only **53** per cent of residents or local businesses concurred. However, **66** per cent of other stakeholders held the opposing perspective and viewed poor property conditions as a fairly big or very big problem.

To what extent do you believe each of the following to be a problem in your local area of Havering?

● A very big problem ● A fairly big problem ● Not a very big problem ● Not a problem at all



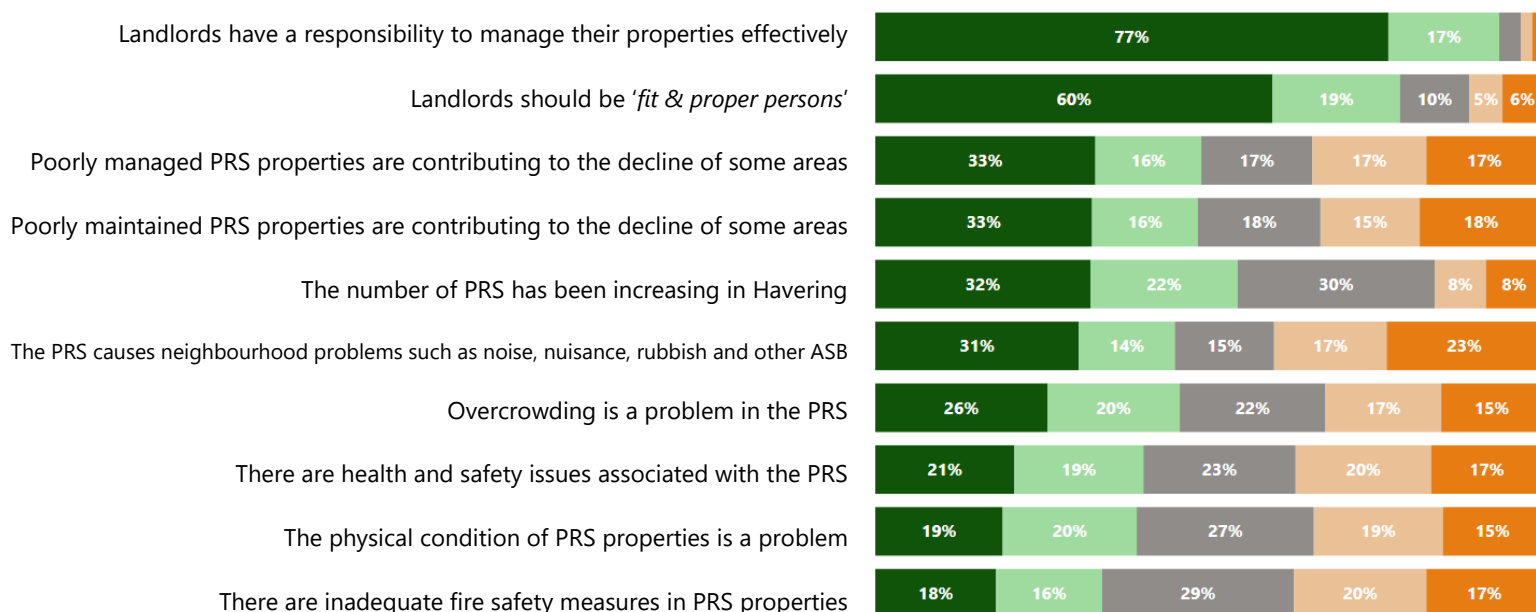
3.13 Views on the PRS in Havering

Respondents were also asked about their views on the PRS in Havering as a whole.

All **403** respondents answered this question.

To what extent do you agree or disagree with the following statements?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree



Landlord responsibility

When asked if landlords have a responsibility to manage their properties effectively, the overwhelming majority of respondents, **94** per cent, either agreed or strongly agreed.

'Fit and proper' person

When asked if landlords should be 'fit and proper' persons (e.g. have proper management or financial arrangements in place and not have convictions for certain types of offences), again, the overwhelming majority, **79** per cent, either agreed or strongly agreed.

Poorly managed properties

When asked whether poorly managed private rented properties were contributing to the decline of some areas in Havering, the responses were mixed, with **49** per cent either agreeing or strongly agreeing and **34** per cent disagreeing or strongly disagreeing.

Poorly maintained properties

When asked whether poorly maintained private rented properties were contributing to the decline of some areas in Havering, the responses were mixed, with **49** per cent either agreeing or strongly agreeing and **33** per cent disagreeing or strongly disagreeing.

Number of private rented properties

When asked whether the number of private rented properties in the borough has been increasing, **54** per cent agreed or strongly agreed, while only **16** per cent disagreed or strongly disagreed. A large proportion of respondents, **30** per cent, stated that they neither agreed nor disagreed.

Neighbourhood problems such as noise, nuisance, rubbish and other ASB

When asked whether the PRS causes neighbourhood problems, the majority, **45** per cent, agreed or strongly agreed, while **40** per cent disagreed or strongly disagreed.

Overcrowding

When asked whether there was an issue with overcrowding in private rented properties in the borough, a majority, **46** per cent, agreed or strongly agreed, while **32** per cent disagreed or strongly disagreed and **22** per cent neither agree nor disagreed.

Health and safety Issues

When asked whether there were health and safety issues with private rented properties in the borough, the responses were more mixed, with **40** per cent either agreeing or strongly agreeing and **37** per cent disagreeing or strongly disagreeing. **23** per cent neither agreed nor disagreed.

Physical condition of properties

When asked whether the physical condition of private rented properties in the borough was a problem, the responses were again mixed, with **39** per cent either agreeing or strongly agreeing and **34** per cent disagreeing or strongly disagreeing. **27** per cent neither agreed nor disagreed.

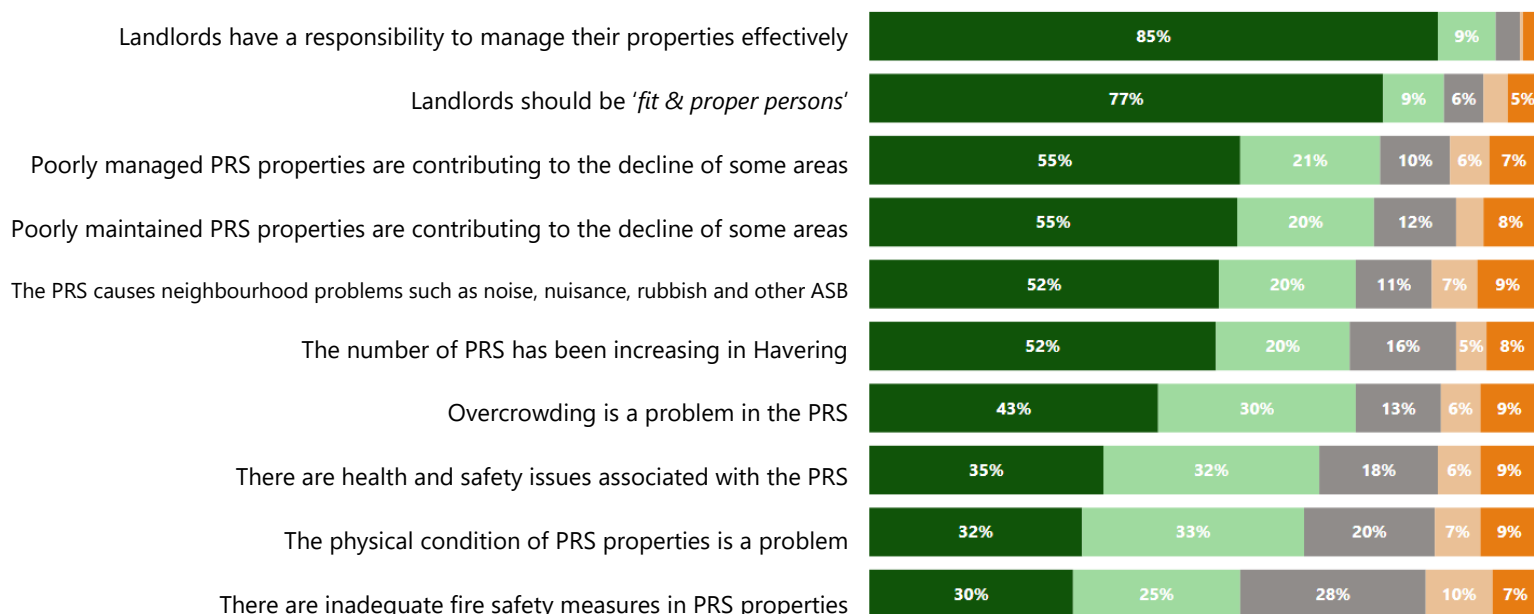
Inadequate fire safety measures

When asked whether there were inadequate fire safety measures in private rented properties in the borough, responses were again mixed. **34** per cent agreed or strongly agreed, **37** per cent disagreed or strongly disagreed and **29** per cent stated that they neither agreed nor disagreed.

Similarly, when looking at responses by stakeholder group, there is a stark contrast between landlords, letting and managing agents' perceptions of the PRS in Havering and that of residents or local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

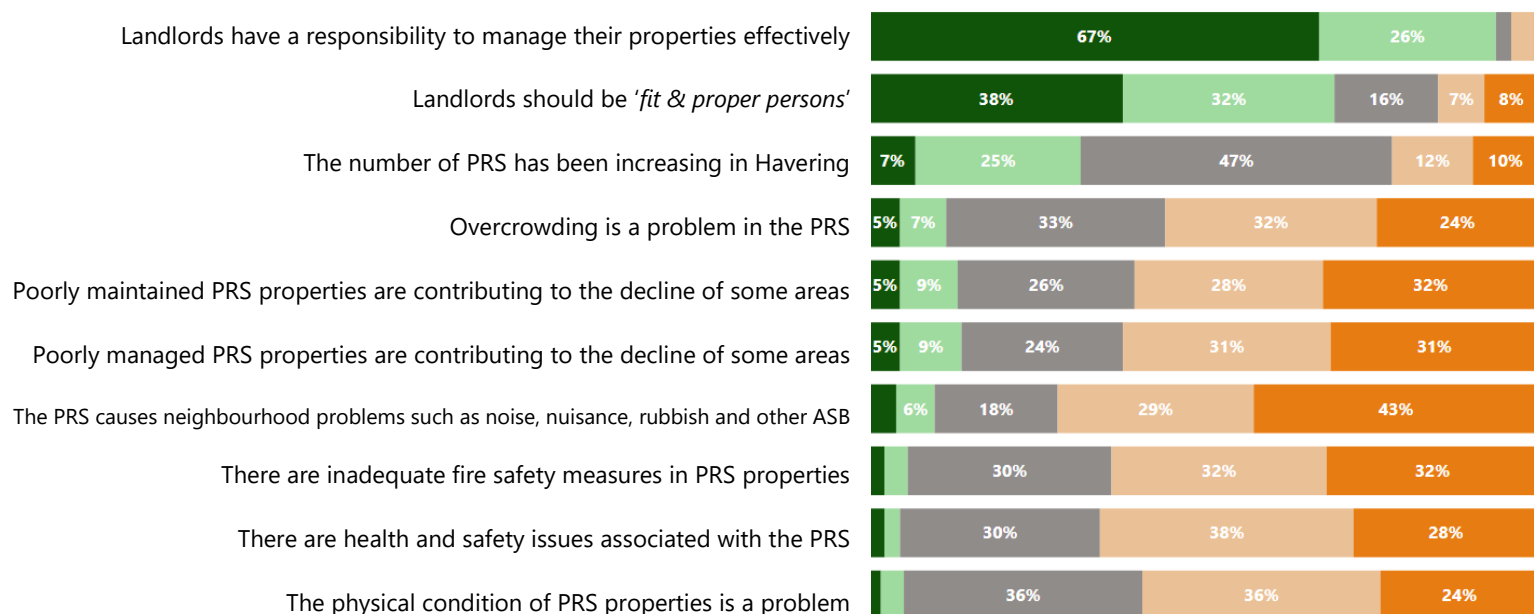
To what extent do you agree or disagree with the following statements? *(residents or local businesses)*

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree



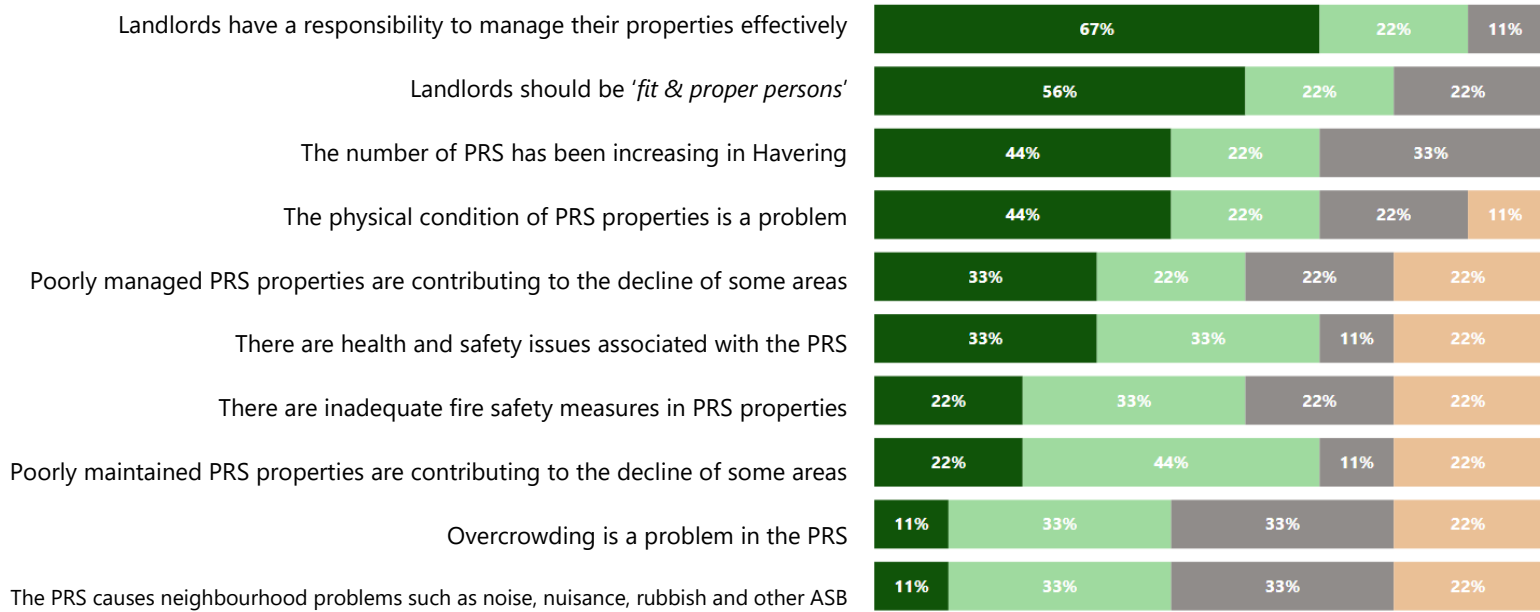
To what extent do you agree or disagree with the following statements? *(landlords, letting or managing agents)*

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree



To what extent do you agree or disagree with the following statements? *(another type of stakeholder)*

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree



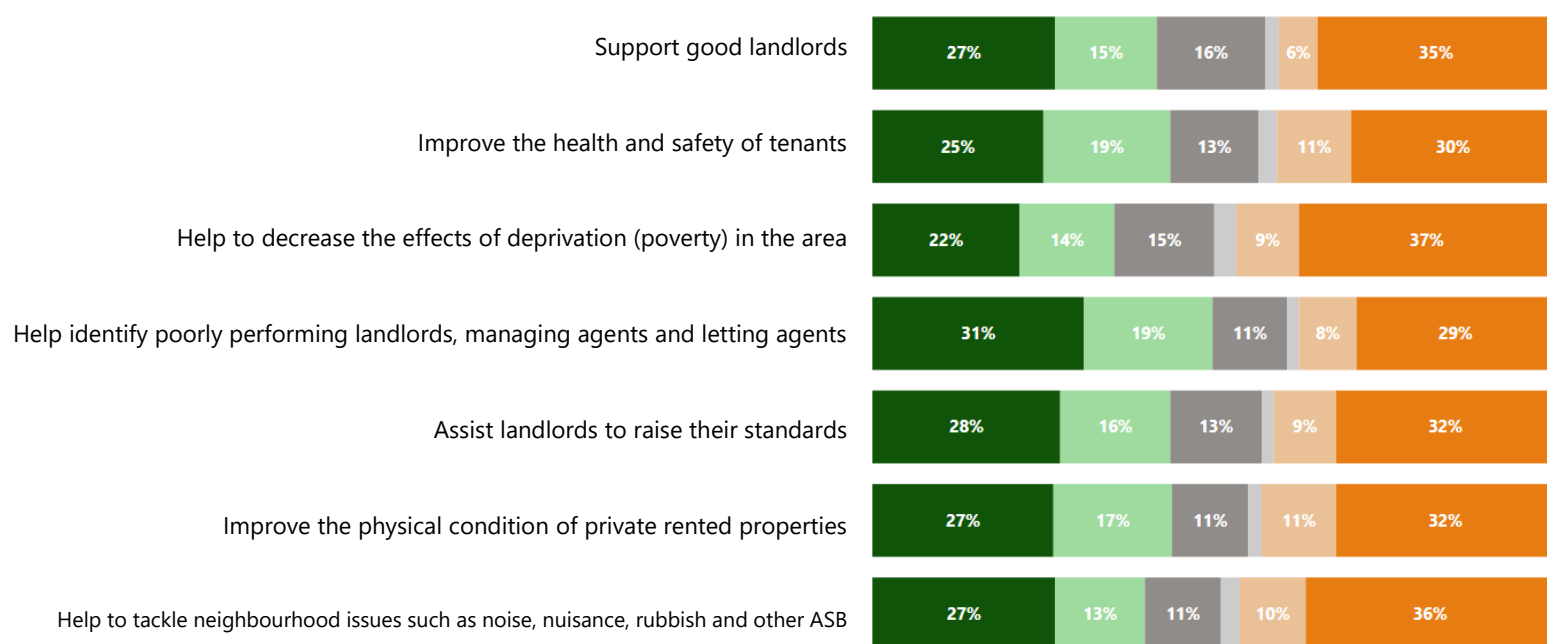
Views on selective licensing scheme outcomes in Havering

Respondents were also asked about their views on whether they thought a selective licensing scheme in Havering would help to achieve certain outcomes.

All **403** respondents answered this question.

To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



The question asked respondents to what extent they agreed that a selective licensing scheme in Havering would help to achieve the following outcomes:

Support good landlords

42 per cent, either agreed or strongly agreed, while **41** per cent said they disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of tenants

44 per cent, either agreed or strongly agreed, while **41** per cent either disagreed or strongly disagreed. **15** per cent said they neither agreed nor disagreed or didn't know.

Help to decrease the effects of deprivation (poverty) in the area

A majority of respondents, **46** per cent, either disagreed or strongly disagreed, while **36** per cent either agreed or strongly agreed. **18** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing landlords, managing agents and letting agents

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **37** per cent said they disagreed or strongly disagreed. **13** per cent said they neither agreed nor disagreed or didn't know.

Assist landlords to raise their standards

44 per cent, either agreed or strongly agreed, while **41** per cent either disagreed or strongly disagreed. **15** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of private rented properties

44 per cent, either agreed or strongly agreed, while **43** per cent either disagreed or strongly disagreed. **13** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

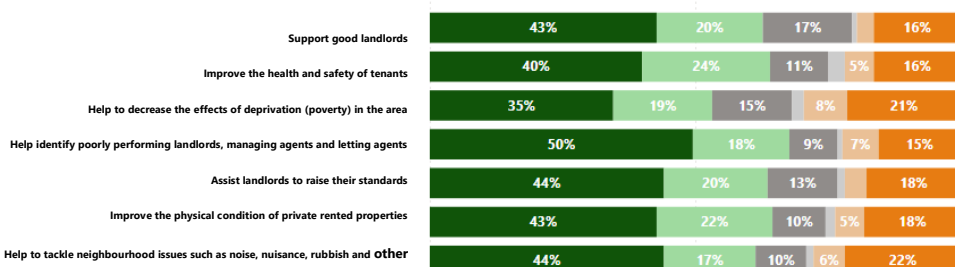
A majority of respondents, **46** per cent, either disagreed or strongly disagreed, while **40** per cent either agreed or strongly agreed. **14** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

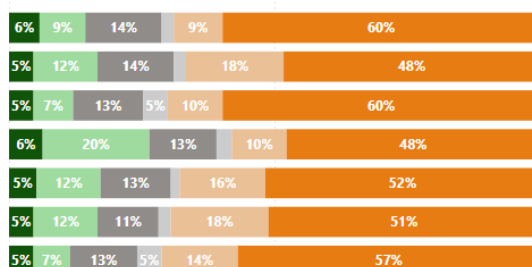
To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree

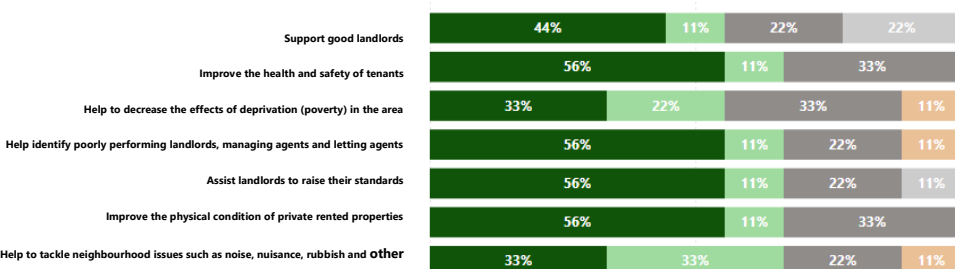
As a Havering resident or a local business in Havering (but not a landlo...



As a landlord, letting or managing agent with properties in Havering



As another type of stakeholder



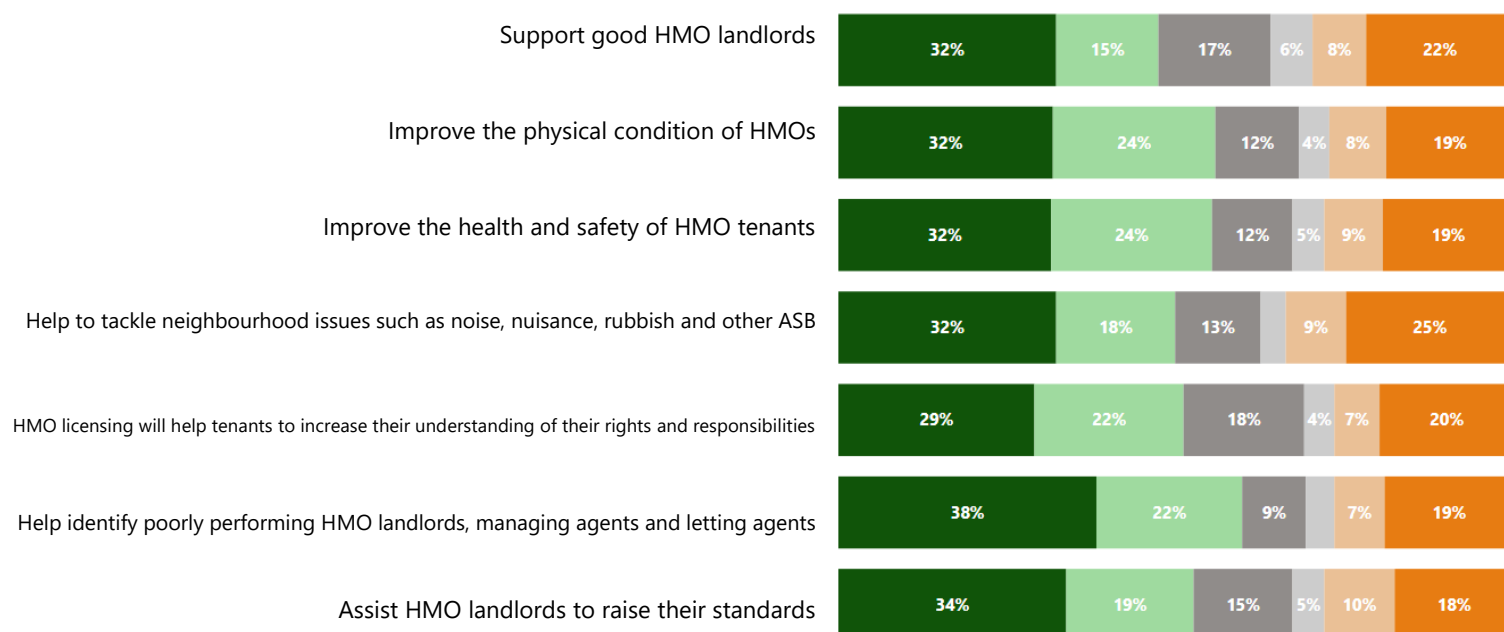
Views on additional HMO licensing scheme outcomes in Havering

Respondents were also asked about their views on whether they thought an additional HMO licensing scheme in Havering would help to achieve certain outcomes.

All **403** respondents answered this question.

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



The question asked to what extent they agreed that an additional HMO licensing scheme in Havering would help to achieve the following outcomes:

Support good HMO landlords

A majority of respondents, **47** per cent, either agreed or strongly agreed, while **30** per cent either disagreed or strongly disagreed. **23** per cent said they neither agreed nor disagreed or didn't know.

Improve the physical condition of HMOs

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. Almost **17** per cent said they neither agreed nor disagreed or didn't know.

Improve the health and safety of HMO tenants

The majority of respondents, **56** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. **17** per cent said they neither agreed nor disagreed or didn't know.

Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB

A majority of respondents, **50** per cent, either agreed or strongly agreed, while **34** per cent either disagreed or strongly disagreed. **16** per cent said they neither agreed nor disagreed or didn't know.

Help tenants to increase their understanding of their rights and responsibilities when living in an HMO

The majority of respondents, **51** per cent, either agreed or strongly agreed, while **27** per cent either disagreed or strongly disagreed. **22** per cent said they neither agreed nor disagreed or didn't know.

Help identify poorly performing HMO landlords, managing agents and letting agents

The majority of respondents, **60** per cent, either agreed or strongly agreed, while **26** per cent either disagreed or strongly disagreed. Nearly **14** per cent said they neither agreed nor disagreed or didn't know.

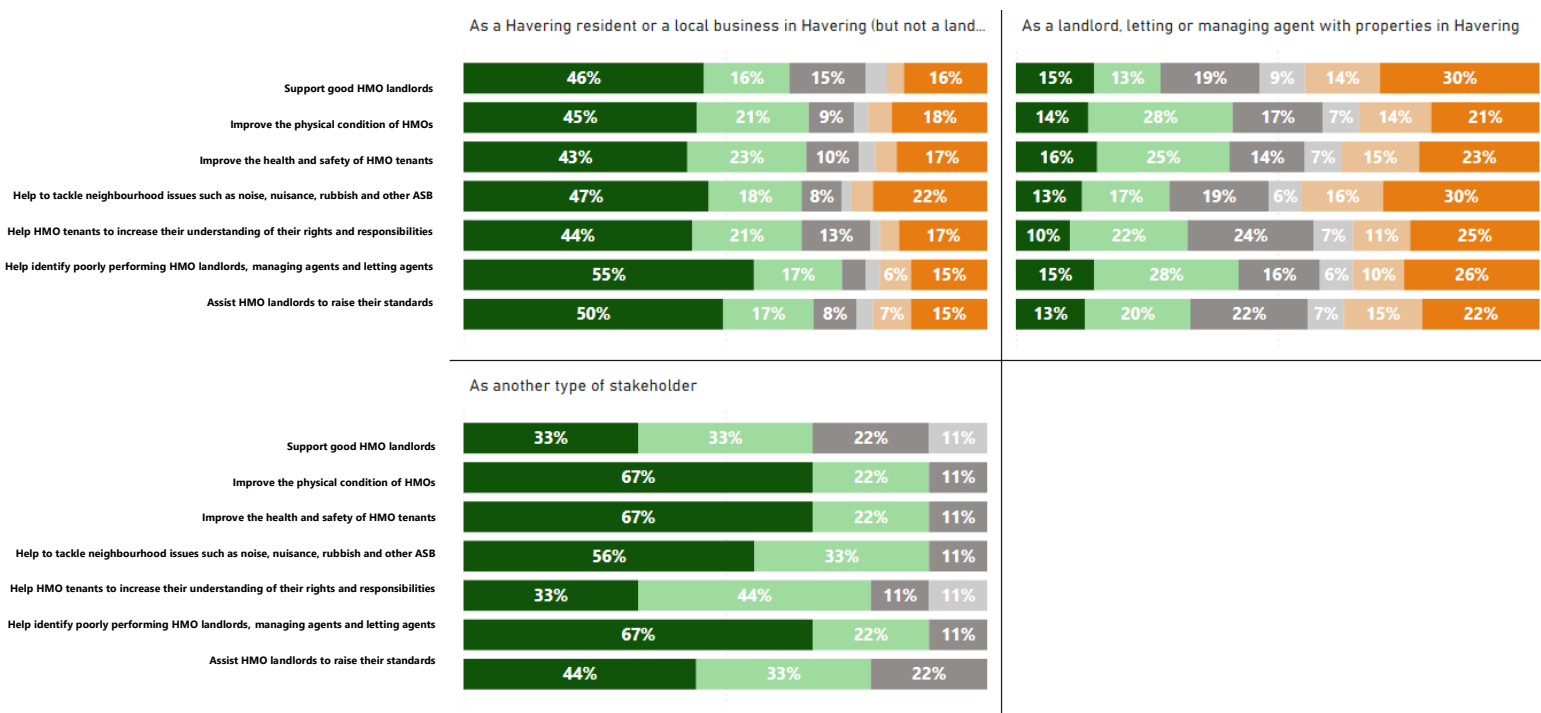
Assist HMO landlords to raise their standards

The majority of respondents, **53** per cent, either agreed or strongly agreed, while **28** per cent either disagreed or strongly disagreed. Nearly **20** per cent said they neither agreed nor disagreed or didn't know.

As is the case with many of the other questions, there is some polarity between the views of landlords, letting and managing agents and those of residents and local businesses and other stakeholders. The stakeholder breakdown is shown in the graphs below.

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Don't know ● Tend to disagree ● Strongly disagree



3.14 Alternative solutions, other comments and considerations

Open text responses were also requested to gather additional comments, and to determine whether stakeholders felt that there was anything further that the Council should consider to help improve the condition and management of the PRS in Havering.

A significant number of respondents proposed alternative solutions, such as borough-wide selective schemes, better enforcement of existing laws, and incentives for good landlords. There was also strong sentiment around the impact of HMOs on community cohesion, infrastructure, and property values. Overall, the feedback highlights a desire for a targeted, transparent, and balanced approach that supports responsible landlords while effectively addressing poor housing conditions and anti-social behaviour.

1. *Borough-wide licensing preferred over selective schemes:* many respondents argued that limiting the scheme to certain wards would displace problems and unfairly penalise landlords in specific areas.

"The scheme should be borough wide to push rogue landlords out of Havering entirely. Rogue landlords will be incentivised to move to the wards where there is no licensing scheme and the problems with property conditions and ASB will shift to other places."

"I think this scheme should be made borough wide, rather than just individual wards. It will just push the worst landlords to other wards."

"I totally agree with the licensing but find it highly discriminatory and inappropriate that this is being restricted to only certain parts of the borough."

2. *Limit the number of HMOs, which are seen as detrimental to community cohesion and infrastructure:* many residents expressed strong opposition to HMOs, citing issues like overcrowding, noise, rubbish, and ASB.

"HMOs should be discouraged as they are detrimental to the area."

"I have been forced to move out of the area because the council allowed the other half of my semi-detached house in a lovely road to be made into an HMO."

"There should not be more than one HMO allowed in a street."

3. *Targeted, intelligence-led enforcement*: instead of blanket licensing, stakeholders proposed focusing enforcement on known problem areas or landlords with a history of complaints.

"Focus on the landlords with complaints and spot check properties belonging to letting agents."

"Adopt a more intelligence-led enforcement strategy that targets properties and landlords with a proven history of substandard conditions or tenant complaints."

"Licenses should be for poorly performing landlords only and not penalise the decent landlords."

4. *Improve tenant education and reporting mechanisms*: some respondents recommended empowering tenants with better information and easier ways to report issues.

"Encourage tenants to know their rights, they have a choice to take up a tenancy or not."

"Create a direct line service where tenants can report rogue landlords to the Council."

"The council know which properties are rented out, so they can make the renters aware of their rights by emailing them the relevant information/where to access it, this wouldn't cost any money."

5. *Help with problem tenants and evictions*: some landlords feel powerless when tenants behave poorly, damage property, or refuse to pay rent. They want faster eviction processes and Council support in managing these situations.

"Landlords need protection too...The council must be fair to all parties."

"It's becoming nearly impossible to remove a problematic tenant, even in cases involving drug use, repeated antisocial behaviour, chronic late payment—or no payment at all."

"Landlords can't predict future actions of tenants... It seems to me the Licensing scheme in its iteration seems to be designed to be punitive towards Landlords while not providing support or assisting them with issues arising from problem tenants who are the ones causing a lot of what the licensing scheme is purportedly trying to prevent!"

"Some tenants feel they have a right to abuse a property simply because they are paying rent. If the local authorities had a balanced view in protecting landlords' rights as much as tenants, there would be a fairer marketplace."

6. *Improve Council support and engagement with landlords:* some landlords report poor communication and minimal engagement from the Council, even after paying licensing fees. They want meaningful support and recognition for responsible practices.

"I have been part of the selective licensing scheme for the past 4 years, and it has made no difference to the way I manage my property or the already high level of accommodation I provide to tenants. Moreover, I've received zero communication from the council during the 4 years that it has been in place - the fee was duly taken and then radio silence."

"The council should do more to support those who are actively contributing to the community—particularly landlords who are generating the income that helps sustain it."

"There is absolutely nothing about the SLL scheme that provides any support or feedback to landlords. It is all stick and no carrots."

7. *Await national reforms and EPC requirement changes:* several stakeholders referenced the *Renters Reform Bill*, *Renters Rights legislation*, and upcoming changes to *EPC ratings* in their responses. These comments reflect concerns about the cumulative regulatory burden on landlords including:

- Increased costs from overlapping national and local schemes.
- Reduced profitability and incentives to remain in the rental market.
- The risk of landlords exiting the sector, reducing housing supply.
- A call for councils to wait for national reforms to take effect before introducing additional local licensing.

"The new Renters Rights Bill will require a landlords register. What does you proposed selective licensing add to this register?"

"I also think this is unnecessary due to the removal of section 21 as part of the renters right bill where tenants are better protected and don't have to worry about speaking up and being kicked out."

"The Selective License Scheme does not help the "Good Landlords" in any way. It's simply another Tax which makes landlords reluctant to remain in the market. We have a housing crisis and most of the landlords I know will be considering selling due the renters reform bill and the tax implications so adding another tax/cost is simply going to help make that decision become more likely."

"Quite simply, this new selective license scheme and the pending EPC level increase combined with the renters reform bill will mean a mass exodus of private landlords in the borough..."

"With the change in taxation and the Renters Reform Bill coming over the horizon we have just had to sell up..."

3.15 Views supporting the proposed schemes

It is worth noting that, although the majority of the free text questions invited responses, these were only when respondents were in disagreement. There were, however, many positive comments about the scheme. Some of these are listed below:

"The parts in Appendix 3 about waste such as giving information about recycling are really good, in line with Re London recommendations."

"Hopefully the licensing schemes will improve the conditions in the private sector. There are some landlords who do not reinvest any rental monies back into the property to prevent health and safety issues."

"Any kind of regulation to support good tenants & ensure landlords are liable is good, as long as enforcement takes place by the authority."

"I think this is an excellent idea. This is the only way to approve conditions for tenants and stop poor properties being rented out."

"I agree with the scheme but in my opinion, it should apply to all areas."

"Licensing, via the conditions ensures the license holder is held accountable... ensures 'rogue' landlords face enforcement action."

"My daughter is in rented accommodation... I still think the licensing adds responsibility, quality, accountability, improvement and security to both sides."

"The sooner these fees are brought in the better."

"Please if any of these new regulations can help us in any way I am completely for it."

"I think it should be rolled out across the whole borough so that expectations are made clear to all."

4. Public meetings and written responses

Havering Council held two virtual public forums to provide information about the proposed schemes and to gather feedback from stakeholders. Feedback was also gathered through formal written responses. Below is a summary of the key themes that came out of the forums and the written submissions.

Council officers also responded to email queries that were sent as part of the consultation.

4.1 Public online forums

The Council, in conjunction with Cadence Innova, held two meetings aimed at engaging with landlords, agents and residents, to make them aware of the consultation and to gather their feedback. There was an online meeting (via Microsoft Teams) which was held on **14 May 2025** with **41** attendees (the actual number of attendees fluctuated during the meeting as attendees joined late or left early), and a further virtual event held on **18 June 2025** with **102** attendees.

Council officers were present at both public forums. Following on from a presentation about the proposals the majority of the meeting was used to undertake a question-and-answer session. Attendees had the opportunity to express their views and ask questions about the proposals. They were able to highlight areas requiring clarification and suggest matters for the council officers to consider. During each public forum, Council officers attempted to address all questions posed by attendees or directed them to the consultation documents for further information (often when there were specific questions about the proposed licence conditions, fees etc).

The main themes of the questions and views expressed were as follows, categorised by theme:

Fees & discounts

How is the £950 for a selective licence justified?

Will the licence fee be passed on to tenants?

Can the fees be paid in instalments over five years?

Why is there no early bird discount this time?

What is the estimated cost of operating the scheme?

Fairness, scope & justification

Why are good landlords being penalised for the actions of rogue landlords?

The selective licensing comes across as punitive towards landlords in wards that are going to be hit by the licensing fee

Would it not be fairer to target those landlords that have repeated offenses?

Why is the scheme not borough-wide if the aim is to improve standards?

Effectiveness & enforcement

What happens if a landlord doesn't apply for a licence?

Will every property be inspected?

What happens if a licence application is unsuccessful?

Landlords with unsatisfactory properties will probably not be on this webinar and will probably not bother to get a license. How will this be followed up?

What guarantee do we have that the licensing scheme will be set up and run correctly by the council?

Evidence and data transparency

Is it possible to see the data behind why these areas have been selected?

How does the data from private landlord complaints compare to council tenant complaints?

What evidence is there that licensing schemes are effective?

How do we request further empirical data is obtained to support this proposal?

Impact on tenants and housing supply

Will this drive up rental prices?

What happens to tenants if a landlord sells due to the scheme?

Are good tenants being penalised too?

Ultimately these costs will be passed on to tenants so this doesn't feel like it will help those who this scheme is designed to help.

Support for landlords

Will there be assistance for smaller landlords?

What happens if tenants damage the property between inspections?

Will the council buy properties from landlords who can't afford to continue?

What schemes are the council going to introduce to support landlords with terrible tenants?

Operational details and application process

How will the relevant landlords be notified of what they need to do and when in terms of registering?

How quickly do you expect to grant a licence?

Will the same 30 days period remain? And what happens if planning is not up to speed?

Legal and planning considerations

Do single households require a licence?

Are Havering able to designate areas as unsuitable for further/new HMOs for example by an Article 4 direction?

Can planning permission still be obtained for HMOs in Article 4 areas?

How does licensing relate to planning enforcement?

In summary, many landlords and agents held strong views and were negative to PRS licensing in general. In particular, they perceived unfairness of the scheme in targeting good landlords and were concerned about the effectiveness of selective licensing schemes and the council's own ability to achieve its objectives. The main objections, however, were to the economic costs of licensing schemes on landlords, which they felt would inevitably be passed onto tenants.

Though a significant number of the attendees were landlords and managing/letting agents, a number of tenants were also among the participants. The views of tenants as a group were difficult to assess in the context of the forum because they did not self-identify when posting questions to the Q&A.

4.2 Written representations

Havering Council received 31 written responses through its email inbox during the consultation period from various stakeholders including residents, landlords and landlord groups including Safeagent, the NRLA and Propertymark. A summary of key themes and concerns is listed below and the three organisations' full submissions are included in Appendix 4.

High cost: *Proposed fees (£1400 for additional, £950 for selective) are considered excessive and may deter investment in the PRS. (Safeagent) Especially affects landlords with larger portfolios in London. (Propertymark)*

Lack of transparency in fee structure: *Safeagent and Propertymark request a detailed cost breakdown to justify the fees and provide clarity on total and cumulative costs to the Council. (Safeagent), (Propertymark)*

Unfair fee structure: *Charging full fees for licenses granted for less than five years is deemed unreasonable. Pro-rata adjustments are fairer but complex. (Safeagent)*

Fee waiver suggestion: *Advocates for fee exemptions where landlords assist with homelessness duties. (Safeagent)*

Insufficient resources: *Concerns that enforcement may be underfunded, especially with the Renters' Rights Bill pending. (Safeagent)*

Need for joined-up services: *Calls for better coordination between Trading Standards and Private Sector Housing teams. (Safeagent)*

Unfair expectations: *Argues that agents and landlords should not bear disproportionate responsibility for tackling ASB, occupancy limits, mental health issues or substance abuse among tenants (Safeagent), (NRLA), (Propertymark)*

Sector differences ignored: *Warns against equating PRS responsibilities with those of publicly funded social landlords. (Safeagent)*

Lack of transparency in outcomes: *Calls for regular, detailed reporting on licensing implementation and outcomes, including detailed breakdown of previous scheme. (Safeagent), (NRLA), (Propertymark)*

Underutilisation of current powers: *The NRLA implies that better use of existing legislation could achieve desired outcomes without new schemes. (NRLA)*

Lack of support for bulky waste removal: *No current mechanism to help landlords dispose of items left by tenants. Other councils (e.g., Leeds) offer complimentary services to licensed landlords, which Havering could emulate. (NRLA)*

Lack of clarity for inspections: *No clear plan for property inspections—whether all properties will be inspected, and what methodology (e.g., risk-based or geographic) will be used. (NRLA)*

Better alternatives exist: *Suggests using council tax records to identify private rented properties and landlords, which avoids reliance on self-identification and is harder for criminal landlords to evade. (NRLA)*

Opposition to licensing as a regulatory tool: *Education-based regulatory frameworks that support landlords in improving property conditions are preferable. (Propertymark)*

Criticism of renewal: *The need to renew the scheme suggests previous objectives were unmet. (Propertymark)*

Duplication: *Overlaps with the proposed national landlord registration scheme in the Renter's Rights Bill. (Propertymark)*

Misattribution of issues: *Some problems may stem from social housing, not the PRS. (Propertymark)*

Call for targeting: *A borough-wide approach to additional HMO licensing is too broad; targeted interventions are recommended. (Propertymark)*

Payment methods and discounts: *Request for clarity on payment methods, including invoicing for agents managing multiple properties. Concern about lack of discounts for landlords with large portfolios. (Propertymark)*

Energy standards: *Concern over future EPC requirements and their impact on landlords. Clarity sought on financial grants or loans for landlords to bring older properties up to standard. (Propertymark)*

Section 21 and tenant management risk-aversion: *Licensing and legislative changes may deter landlords from accepting tenants with less-than-perfect histories. (Propertymark)*

4.3 Letter of support

During the consultation, Havering Council also received a letter in support of the council's proposals to implement the additional HMO and selective licensing schemes from Harrow Council, drawing on their current experience of implementing property licensing schemes. This letter can be found in Appendix 5.

5. Appendices

- Appendix 1 - Communications and Marketing visuals and analytics
- Appendix 2 – Survey respondent profile
- Appendix 3 – Survey questionnaire
- Appendix 4 – Full written representations
- Appendix 5 – Letter of support

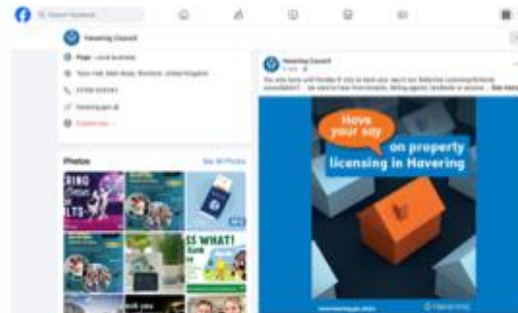
Appendix 1 - Communications and Marketing visuals and analytics



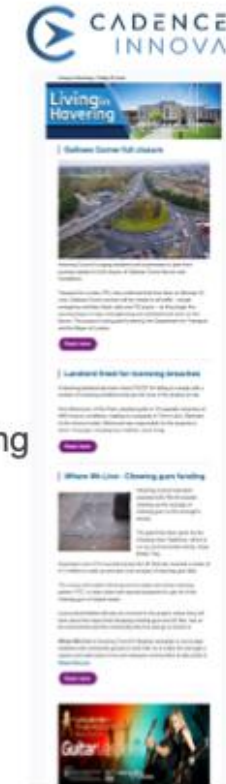
Press release



Facebook



Live Well Havering



Living in Havering

At the Heart



Children's Centre

Online articles



Property 118



The Negotiator

Property 118



London Property Licensing



Romford Recorder

Out of home

461,191 impressions



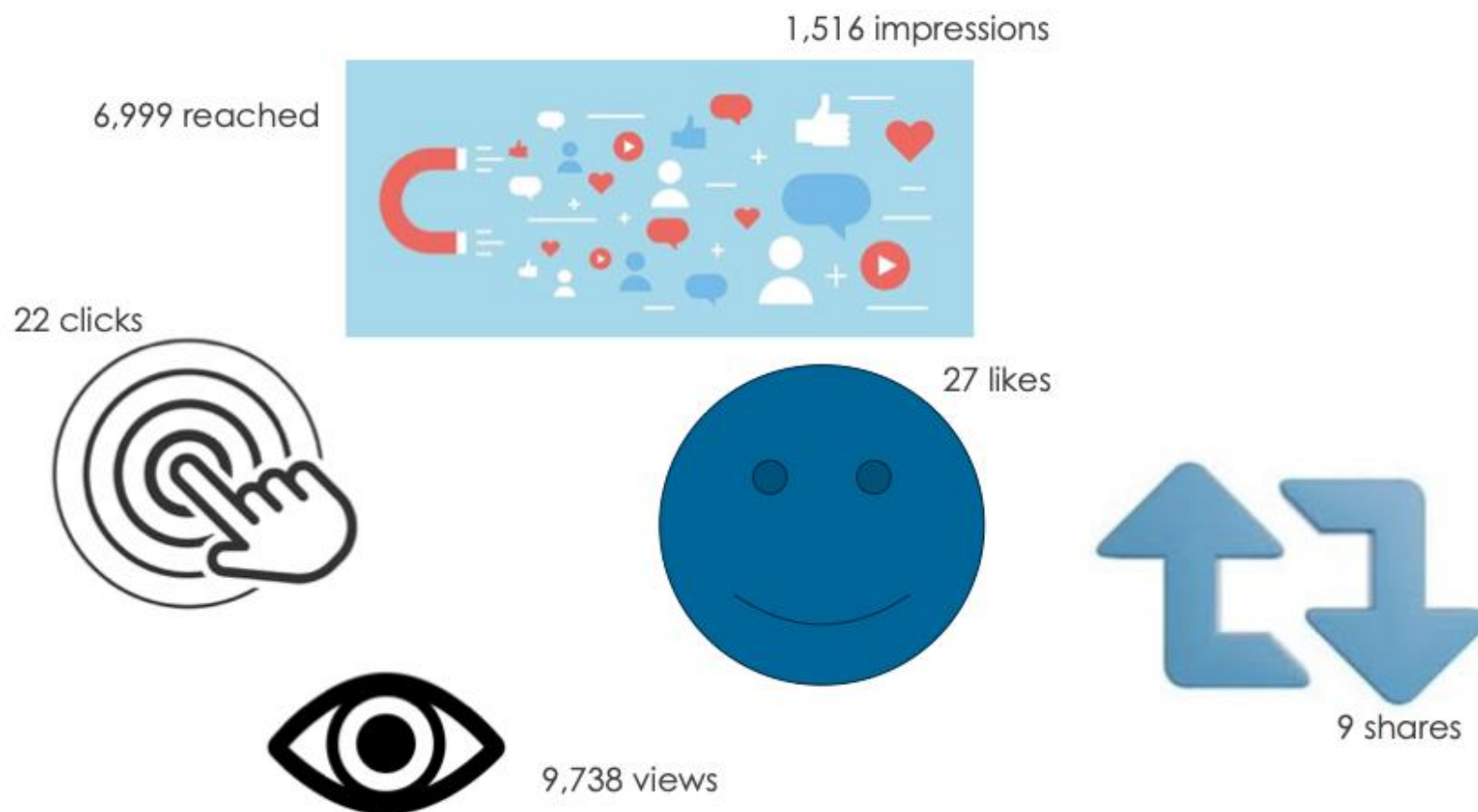
14 days

19 sites

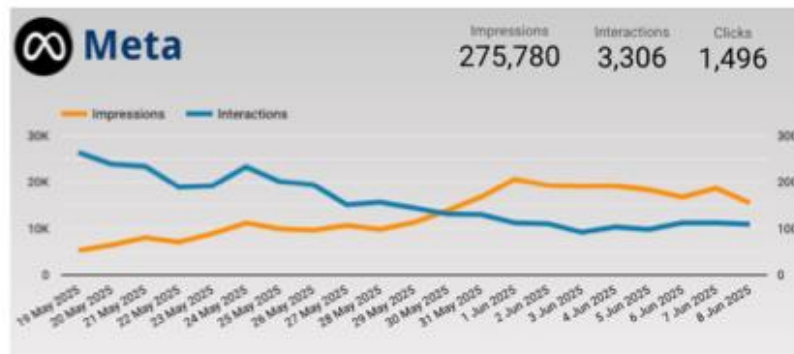
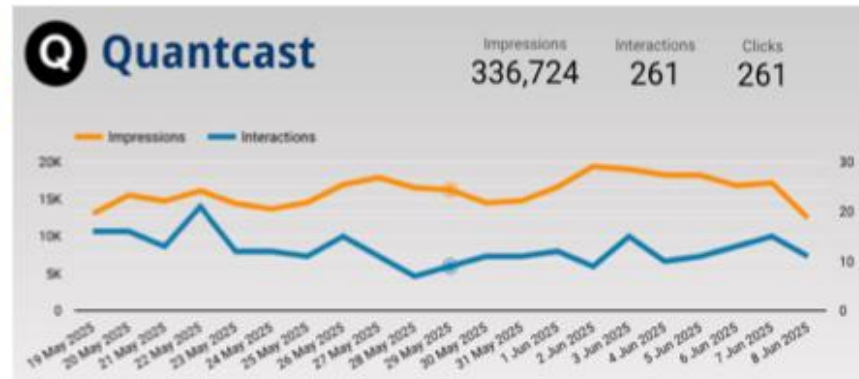


Six boroughs

Organic social media analytics



Programmatic campaign analytics



London Property Licensing campaign

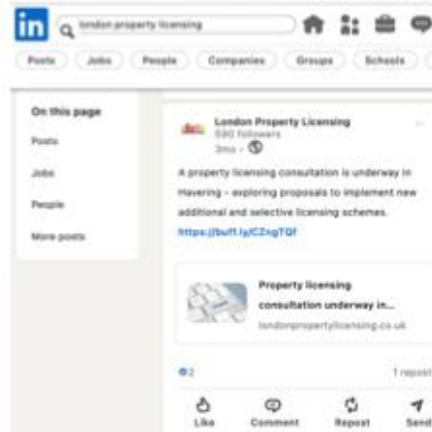
News

Property licensing consultation underway in Havering

Tuesday, April 22nd, 2025 - Havering Council



Havering Council is currently in the process of consulting on the proposed additional and selective licensing scheme for Havering. The consultation is open until 6 July 2025. We are currently consulting on the proposed additional and selective licensing scheme for Havering. The consultation is open until 6 July 2025. We are currently consulting on the proposed additional and selective licensing scheme for Havering. The consultation is open until 6 July 2025.



Home



Explore



Notifications



Messages

← Post

 **LondonPropLicensing**
@lplicensing

Time is running out to have your say on a proposed additional and selective landlord licensing scheme in Havering. The consultation closes on Sunday 6 July. Find out more and have your say buff.ly/6s42afW @LBoffHavering

10:03 AM · Jun 26, 2025 · 22 Views

London Property Licensing News

9 July 2025

Dear Marie

Tuesday 1 July heralded major changes for landlords and agents operating in Wandsworth as new additional and selective licensing schemes came into force. Hackney Council have started consulting on proposed new additional and selective licensing schemes.

You can read about recent housing and planning enforcement activity in Barking & Dagenham, Barnet and Havering - in one case a 26 week suspended prison sentence for unlawful eviction.

With more updates waiting to be uploaded to the website, the next newsletter is already looking busy.

The **London Property Licensing** website provides a vital source of simple, impartial and expert advice on property licensing with a particular focus on the London market, and it's completely free of charge. If your company is interested in sponsoring our monthly newsletter to support this vital service, please drop me a line to discuss.

Richard Tacagni MCIEH CEnvH
Managing Director

Appendix 2 - Survey respondent profile

The respondents to the consultation survey were asked if they would give their age range, gender identity, ethnic origin, and disability status. Their responses were compared with benchmarks for the borough using the 2021 census¹.

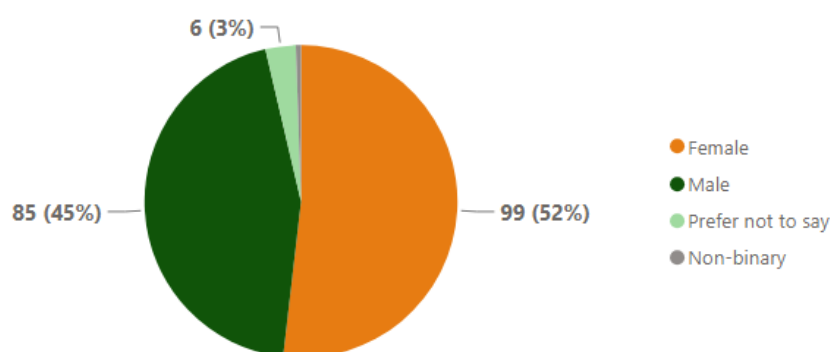
It is worth noting that for each of these equalities' questions, about half of respondents opted out of the equalities' questions altogether (**211** or **52** percent of all respondents). Of those who opted in to these questions (**192**, or **48** per cent of all respondents), a proportion for each question still chose 'prefer not to say' as their response. Therefore, fully accurate comparisons with the compulsory census data cannot always be made.

1 person who opted in to the equalities' questions chose to answer *only* the question on gender identity, and another, *all but that question*, explaining the total response number of **191** for each of the equalities' questions.

Gender identity

Of the **191** respondents who answered this question, **45** per cent said they were male, **52** per cent said they were female, **0.5** per cent said they were non-binary and nearly **3** per cent preferred not to say.

How would you describe your gender identity?



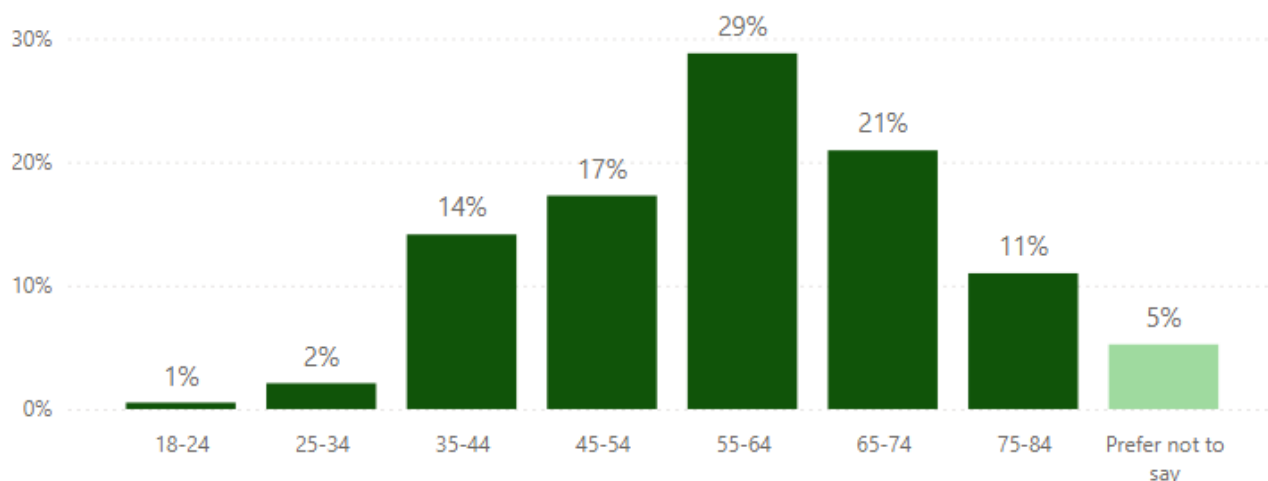
According to the 2021 Census, the population of Havering is **52** per cent female and **48** per cent male, meaning that, among those that chose to answer this question within the survey, men were slightly underrepresented (*though they may equally have chosen the response 'prefer not to say'*). It is worth noting that the comparison with census data is with the question on 'sex', rather than 'gender identity', as gender identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates².

¹ [Census - Office for National Statistics](#)

² [Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics \(ons.gov.uk\)](#)

Age

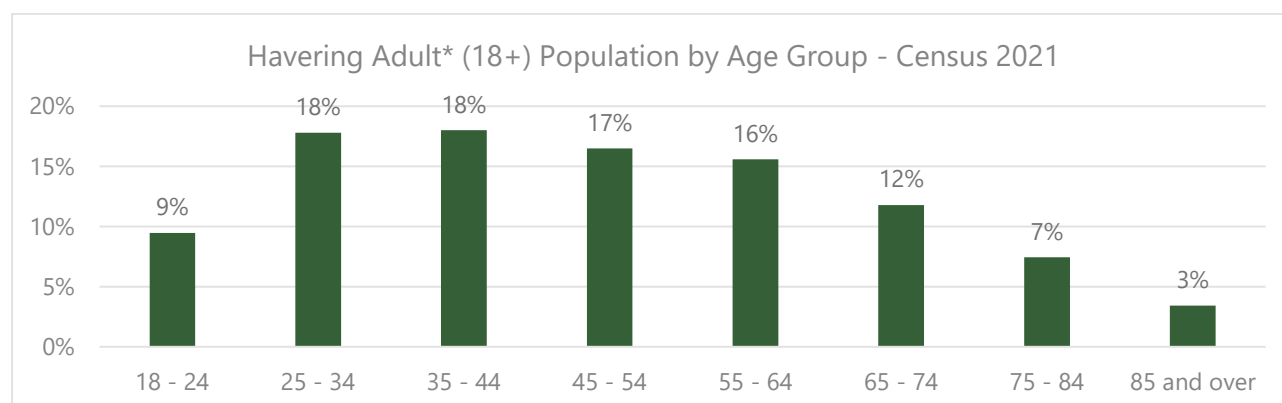
How old are you?



191 respondents answered this question.

The age group of 55 to 64 was the most represented within the consultation, with **55** responses, or about **29** per cent. The age groups 65 to 74 (**40** responses, or **21** per cent) and 45 to 54 (**33** responses, or **17** per cent) were the next largest age-demographic. The age groups 35 to 44 and 75 to 84 made up **14** and **11** per cent respectively, with the lowest proportion of respondents falling into the 25 to 34 and 18 to 24 categories (**2** and **1** per cent respectively). **5** per cent of the **191** respondents to this question preferred not to say.

Compared to the Census data for the borough, the 45 to 54 age group is accurately represented in the survey, at **17** per cent compared to the **17** per cent Census figure. The older demographics, 55 to 64, 65 to 74 and 75 to 84 age groups, are all overrepresented at **29**, **21** and **11** per cent respectively (compared to the Census figures of **16**, **12** and **7** per cent). All younger demographics (18 to 44) are underrepresented in the survey compared to the Census figures.

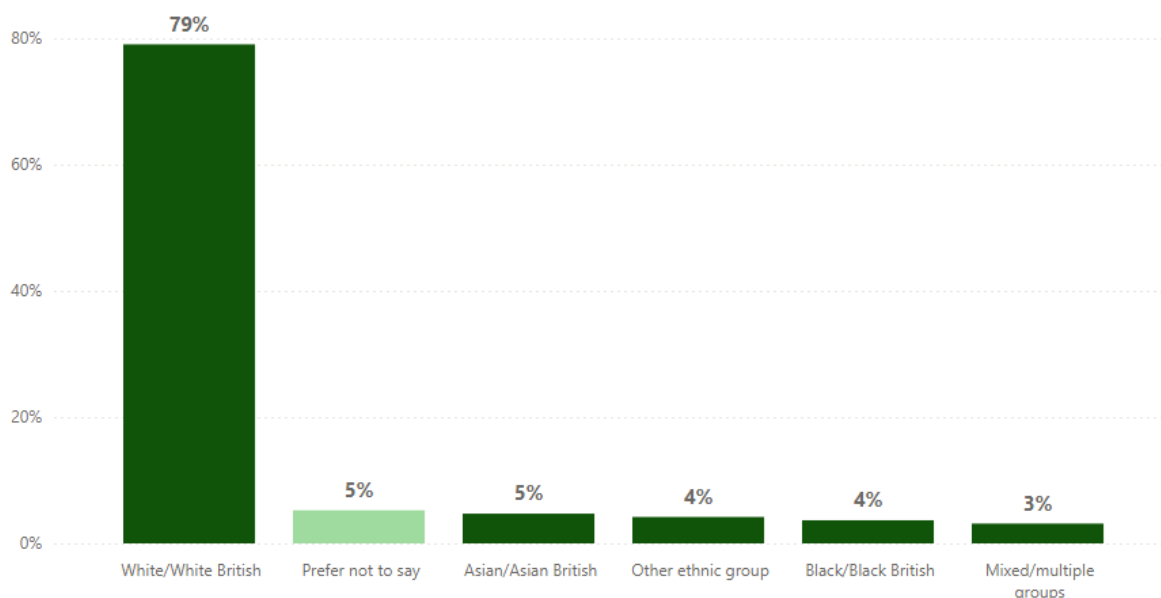


*Please note that the Census figures are the percentage of the adult, over 18-year-old usual resident population in Havering and excludes the under-18 population.

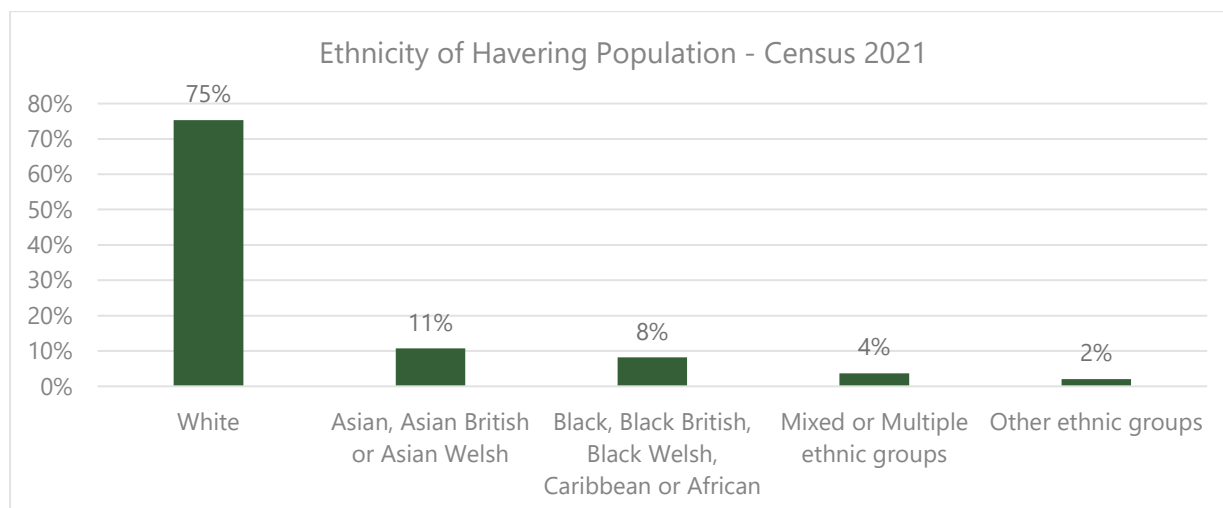
Ethnic origin

Respondents were asked about their ethnic origin, or the group to which they perceived they belonged. **191** respondents chose to answer this question.

Ethnic Origin



The 2021 Census results for Havering regarding ethnic groups are shown below:

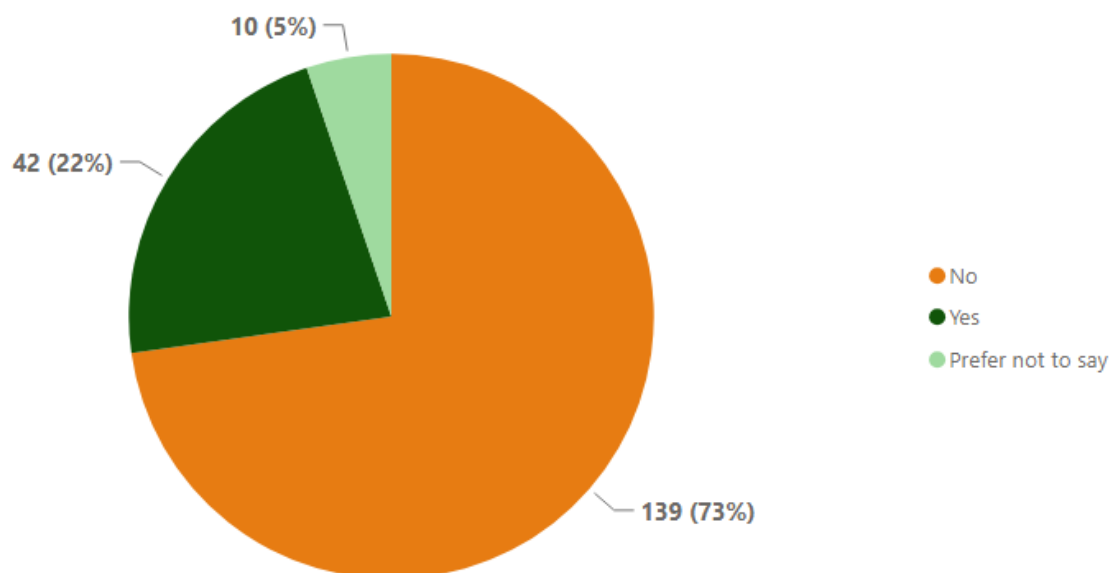


Of those who chose to give an ethnic group, the largest group of consultation respondents were people of white/white British ethnic origin (**79** per cent), which is slightly above the borough's demographic figure of **75** per cent. The proportions of Asian/Asian British (**5** per cent) and black/black British (**4** per cent) are below the borough's demographic figures of **11** per cent and **8** per cent respectively. The proportions of mixed/multiple and 'other' ethnic groups were closer to the borough census figures.

Disability or long-term health condition

Respondents were also asked if they considered themselves to have a disability, impairment or health condition. **191** respondents chose to answer this question.

Do you consider yourself to have a disability, impairment or health condition?



A small proportion (**5** per cent) of those who answered the question gave the response 'prefer not to say'.

22 per cent of the respondents to the question said they considered themselves to have a disability, impairment or health condition, which is above the **15** per cent of Havering residents who, in the 2021 census, stated that they had a disability that affects their day-to-day activities a little or a lot.

Property Licensing

LB Havering Selective and Additional Licensing Consultation Questionnaire

YOUR PRIVACY

All the information you provide will be treated in strict confidence, will only be used for the purposes of this consultation and will only be shared with Cadence Innova who have been appointed by the council as consultants on this project.

Following the consultation a public report will be produced in which feedback from individual members of the public will be anonymous, but views from organisations may be attributed in full.

You can read the Council's Privacy Notice here: [Havering data privacy notice and your information rights | Data protection | London Borough of Havering](#)

YOUR CONNECTION TO THE BOROUGH OF HAVERING

In what capacity are you responding to this survey?

PLEASE TICK ONLY ONE BOX THAT APPLIES TO YOU

☐

As a Havering resident or a local business in Havering (but not a landlord)
– please answer the red shaded question overleaf, then go to the 'Local Issues?' section

☐

As a landlord, letting or managing agent with properties in Havering –
please answer the blue shaded section overleaf, then go to the 'Local Issues?' section

☐

As another type of stakeholder – please answer the green shaded section overleaf, and following questions

Please provide the following information about yourself (where relevant) so that we can monitor the representativeness of the responses and identify trends. We will take all feedback into account, regardless of whether you provide your personal details.

INFORMATION ABOUT YOU: HAVERING RESIDENTS & BUSINESSES

If you are a resident living in Havering, or responding on behalf of a local business in Havering, which of the following best describes you? PLEASE TICK ONE BOX ONLY

☐

Private tenant living in a single-family dwelling (e.g. a self-contained flat or house)

☐

Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (e.g. toilet, bathroom, kitchen) with others

☐

Havering Council tenant

☐

Housing association tenant

☐

Owner occupier

☐

Shared owner – with a share in the equity of the home

☐

Local business in Havering (but not a landlord)

☐

Other (please specify below)

INFORMATION ABOUT YOU: LANDLORDS AND AGENTS

If you are a landlord or agent with properties in Havering, which of the following best describes you? PLEASE TICK ONE BOX ONLY

<input type="checkbox"/> Landlord who manages their own property	<input type="checkbox"/> Managing agent
<input type="checkbox"/> Landlord who uses a managing agent	<input type="checkbox"/> Registered social landlord
<input type="checkbox"/> Letting agent	<input type="checkbox"/> Other (please specify below) <input type="text"/>

Do you live in Havering?

<input type="checkbox"/> Yes	<input type="checkbox"/> No
------------------------------	-----------------------------

Please indicate how many properties you own/manage in Havering, for each of the following types. PLEASE TICK ONE BOX FOR EACH TYPE OF PROPERTY

	0	1	2-10	11-50	51-100	101+
Single family occupancy house/bungalow	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-contained flat converted	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Self-contained flat purpose built	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
House in Multiple Occupation (three or more people)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are you accredited or a member of any of the following? PLEASE TICK ALL THAT APPLY

<input type="checkbox"/> National Residential Landlords Association (NRLA)	<input type="checkbox"/> ARLA Propertymark
<input type="checkbox"/> London Landlord Accreditation Scheme (LLAS)	<input type="checkbox"/> Royal Institution of Chartered Surveyors (RICS)
<input type="checkbox"/> UK Association of Letting Agents (UKALA)	<input type="checkbox"/> Other landlord/letting agent association <input type="text"/>
<input type="checkbox"/> Safeagent	<input type="checkbox"/> No

INFORMATION ABOUT YOU: ORGANISATIONS AND OTHER STAKEHOLDERS

If you are responding on behalf of an organisation, which organisation do you represent?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Please give us the name of the organisation and any specific group or department. Please also tell us who the organisation represents, what area it covers and how you gathered the views of members.

If you are another stakeholder (e.g. with links to a neighbouring borough), please use the box below to provide full details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LOCAL ISSUES?

To what extent do you believe each of the following to be a problem in your local area of Havering? PLEASE TICK ONE BOX IN EACH ROW

	Not a problem at all	Not a very big problem	A fairly big problem	A very big problem
Poor property conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Anti-social behaviour (ASB)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about the private rented sector as a whole in Havering, to what extent do you agree or disagree with the following statements? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree
The number of private rented properties has been increasing in Havering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The physical condition of private rented properties is a problem	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There are health and safety issues with private rented properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overcrowding is a problem in private rented properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
There are inadequate fire safety measures in private rented properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The private rented sector causes neighbourhood problems such as noise, nuisance, rubbish and other antisocial behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly maintained private rented properties are contributing to the decline of some areas in Havering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Poorly managed private rented properties are contributing to the decline of some areas of Havering	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Landlords of private rented properties have a responsibility to manage their properties effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
To help with the management of private rented properties in the borough, landlords should be 'fit and proper' persons (<i>e.g. have proper management or financial arrangements in place, and not</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

have convictions for certain types of offences)

ADDITIONAL HMO LICENSING SCHEME

Havering Council, like all other councils across the country, must operate a mandatory licensing scheme for larger HMOs.

We are proposing to introduce a borough-wide additional HMO licensing scheme that will cover smaller HMOs that are occupied by three or four unrelated people in two or more households that share (or lack) toilet, washing or cooking facilities.

By implementing an additional HMO licensing scheme, the council is able to effectively deal with the poor conditions and anti-social behaviour present in smaller HMOs by requiring landlords to license their property with the council and meet certain property management conditions.

Landlords will need to obtain a licence for an HMO falling within the new scheme. A fee is charged by the council to cover the costs of processing an application, monitoring compliance with licence conditions and enforcing the scheme.

The additional HMO licensing scheme, if approved, would begin in January 2026 and would operate for five years. You can find out more about the proposed additional HMO licensing scheme at <https://www.havering.gov.uk/PRS> (see Evidence Pack)

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Havering? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Improve the physical condition of HMOs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Improve the health and safety of HMO tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help to tackle neighbourhood issues such as noise, nuisance, rubbish and other antisocial behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help tenants to increase their understanding of their rights and responsibilities when living in an HMO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help identify poorly performing HMO landlords, managing agents and letting agents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Assist HMO landlords to raise their standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support good HMO landlords	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you disagree with the proposals for an additional HMO licensing scheme, please can you explain why and what alternatives you think should be considered to address the problems?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

ADDITIONAL HMO LICENCE CONDITIONS

If an additional HMO licensing scheme is introduced, all landlords will be required to obtain a licence for any properties meeting the additional HMO criteria. The licence can contain two types of conditions: mandatory and discretionary.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements, minimum sleeping room sizes and the disposal of household waste. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use and occupation of the licensed property and its condition and contents. You can find out more about the proposed additional HMO licensing scheme conditions at <https://www.havering.gov.uk/PRS> (see Evidence Pack Appendix 2)

To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you disagree with any of the discretionary conditions for additional HMO licensing please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other additional licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below

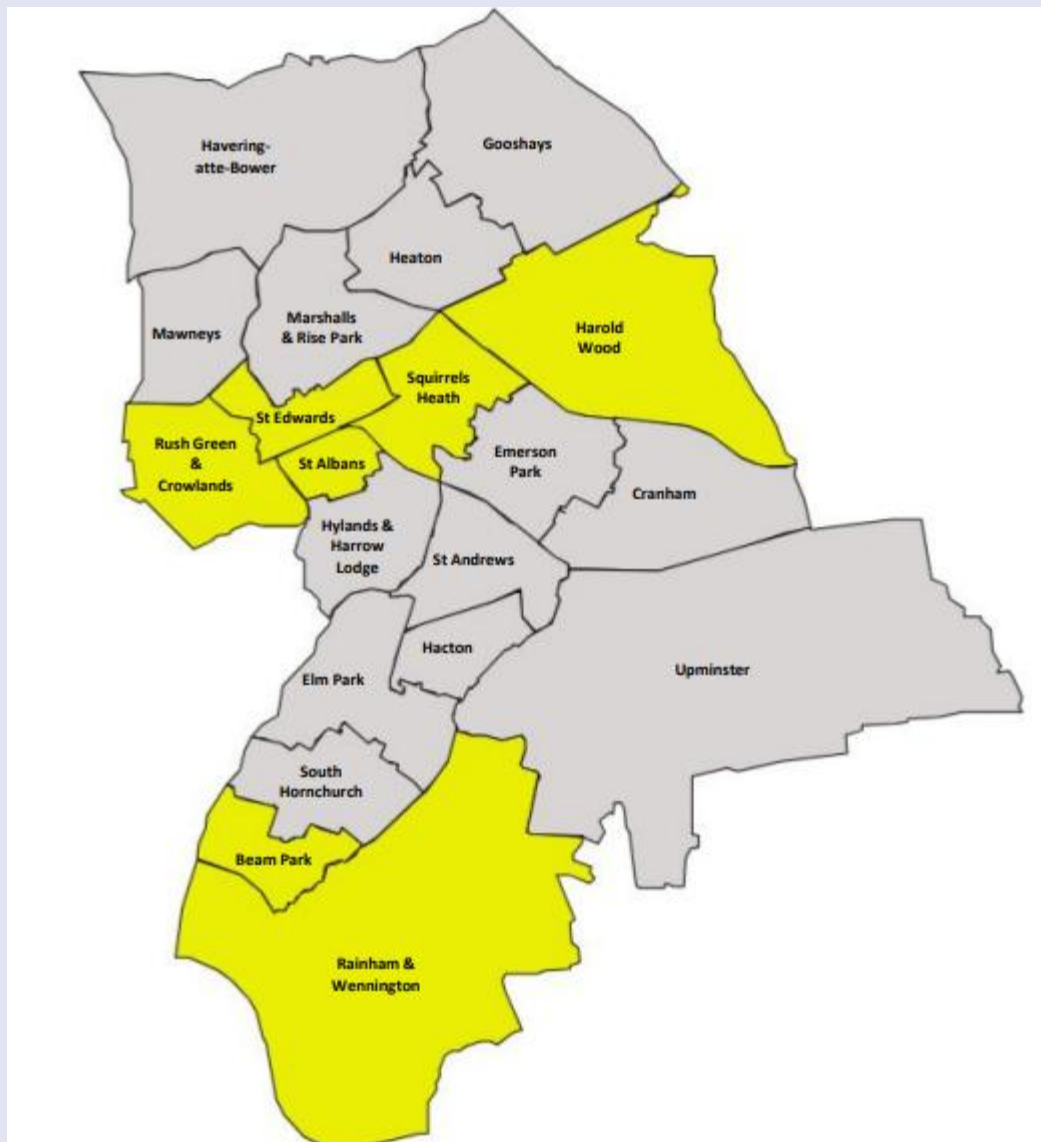
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

SELECTIVE LICENSING SCHEMES

The council is proposing to introduce a selective licensing scheme for all privately rented homes in seven wards. These wards have been chosen because they have high levels of privately rented accommodation which is in poor condition. By implementing a selective licensing scheme, the council is able to effectively deal with the poor conditions by requiring landlords to license their property with the council and meet certain property management conditions.

If approved, it is proposed that the scheme will be introduced in **January 2026**.



If the scheme is implemented, landlords will be required to apply to the council for a licence for each privately rented property they own or manage in the area. Each licence application must be accompanied by a licence fee. Conditions will be attached to each licence and landlords would be bound by these conditions.

You can find out more about the proposed selective licensing scheme at <https://haverling.gov.uk/PRS> (see Evidence Pack)

To what extent do you agree or disagree with the proposal for a selective licensing scheme in the seven wards? PLEASE TICK ONE BOX ONLY

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

To what extent do you agree or disagree that a selective licensing scheme will help to achieve the following outcomes? PLEASE TICK ONE BOX FOR EACH STATEMENT

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Improve the physical condition of private rented properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improve the health and safety of tenants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help to tackle neighbourhood issues such as noise, nuisance, rubbish and other antisocial behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help to decrease the effects of deprivation (poverty) in the area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Help identify poorly performing landlords, managing agents and letting agents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Assist landlords to raise their standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support good landlords	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you disagree with any of the above, please can you explain why and what alternatives you think should be considered to address the problems?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

SELECTIVE LICENCE CONDITIONS

If a selective licensing scheme is introduced, all landlords will be required to obtain a licence for properties meeting the selective licensing criteria. The licence can contain two types of conditions: mandatory and discretionary.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements and references. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use and occupation of the licensed property. You can find out more about the proposed selective licensing scheme conditions at <https://www.havering.gov.uk/PRS> (see Evidence Pack Appendix 3)

To what extent do you agree or disagree with the proposed selective licensing discretionary conditions?

PLEASE TICK ONE BOX ONLY

Strongly agree <input type="checkbox"/>	Tend to agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Tend to disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
---	--	---	---	--	---

If you disagree with any of the discretionary conditions for selective licensing, please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other selective licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
--	---------------------------------------	---

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENSING SCHEME FEES

The Housing Act 2004 permits the council to set licensing fees to cover the costs of administering the licensing scheme over five years. Licence fees cannot be used elsewhere in the council or used to generate a profit. As long as the licence conditions are complied with, the licence would remain valid up to a maximum of five years.

The council's proposed fees per property licence are below. The law requires that the payment is collected in two parts. The initial part of the fee (Part A) is charged to cover the cost of processing the application. If the application for a licence is successful, the remainder of the fee (Part B) will be charged before the full licence is issued. This part of the fee is a contribution to the other costs incurred by the council in running and administering the licensing scheme, for example the cost to the council for enforcement of licences. The licence fee will be kept under review at least annually.

You can find out more about the proposed licensing scheme fees, charges and discounts at <https://www.havering.gov.uk/PRS> (see Evidence Pack Appendix 4)

Scheme	Part A	Part B	Total
Additional HMO	£840	£560	£1400
Selective	£570	£380	£950

What are your views on the proposed additional HMO licensing fee?

PLEASE TICK ONE BOX ONLY

I think the fee is too high	I think the fee is at about the right level	I think the fee is too low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

What are your views on the proposed selective licensing fee?

PLEASE TICK ONE BOX ONLY

I think the fee is too high	I think the fee is at about the right level	I think the fee is too low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LICENCE FEE DISCOUNTS

The council is proposing five different discount payments against the full licence fee. Some properties will be eligible for multiple discounts: Please refer to schedule of fees, charges and discounts for more information (Evidence Pack Appendix 4).

Nature of discount	Amount (Selective)	Amount (Additional)
Multi-dwelling	£100 off Part A	£100 off Part A
EPC rating C and above	£75 off Part B	£75 off Part B
Accredited Landlord	£100 off Part B	£100 off Part B

All discounts are at the discretion of the council and will be kept under annual review.

What are your views on the proposed discounts?

PLEASE TICK ONE BOX ONLY

	I think the discount is too low	I think the discount is at about the right level	I think the discount is too high	Don't know
Multi-dwelling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EPC rating C and above	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Accredited Landlord	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

LICENSING SCHEME OBJECTIVES

As part of the planning process for any private property licensing scheme, the council must define its objectives for the schemes and set out how it plans to enforce these.

You can find out more about the proposed licensing scheme objectives at <https://www.havering.gov.uk/PRS> (see Evidence Pack)

To what extent do you agree or disagree with the proposed licensing scheme objectives? PLEASE TICK ONE BOX ONLY

Strongly agree <input type="checkbox"/>	Tend to agree <input type="checkbox"/>	Neither agree nor disagree <input type="checkbox"/>	Tend to disagree <input type="checkbox"/>	Strongly disagree <input type="checkbox"/>	Don't know <input type="checkbox"/>
---	--	---	---	--	---

If you disagree with any of the objectives for the licensing scheme, please can you explain why?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other licence scheme objectives (that are not already covered by the objectives listed) that you think should be included? If 'Yes', please state below

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
--	---------------------------------------	---

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

DO YOU HAVE ANY FURTHER COMMENTS?

Is there anything else you think the council should consider to help improve the condition and management of the private rented sector in Havering? Are there any other comments that you would like to make about the proposed additional HMO and/or selective licensing schemes?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

LICENSING DESIGNATIONS

Havering Council is legally obliged to offer to send you a copy of the licensing designation(s) before any licensing scheme is introduced. These are supporting documents that define various things including the area where licensing will be required, as well as detailing the commencement and duration of the designation(s).

Please be aware that Havering Council are the data controllers but not the data processors for this survey. Any contact details you provided will be separated from your survey response therefore you will not be identified in the results and report of findings received by the council. We will not pass your details on to any third parties. The council's Data Protection Officer can be contacted via dpo@haverling.gov.uk

Your contact details will be used by Havering Council only for the purpose of the notification under the Housing Act 2004, and of issuing the licensing designation(s), as required to fulfil the council's duties under Regulation 9 (3) - The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 – the publication requirements relating to designations made under the Housing Act 2004, require that within two weeks of a designation being confirmed or made, the local housing authority must send a copy of the notice to any person who responded to the consultation.

The contact information will not be shared, shall be retained for no more than three years after decisions have been finalised, and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. If you are dissatisfied with the processing of your information, you can raise your concern with the council's Data Protection Officer. You have a right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk). Further information can be found at [Havering Data Privacy Notice and Information Rights](#)

Please provide your name with either an email or postal address if you would like to receive a copy of the licensing designation(s)

Full name

Email address

Postal address

MORE INFORMATION ABOUT YOU

**What is the first part of your postcode?
(e.g. RM1 or RM14)**

This will help us understand views in different areas

Havering Council has a duty to promote equality and want to make sure all parts of the community are included in this consultation, but these questions are optional. All consultation responses will be taken fully into account when making decisions, regardless of whether you provide your details.

If you consider yourself disabled, please tick the box(es) below that best describe your impairment. This information helps us improve access to our services

- ☐ Sensory - e.g. mild deafness; partially sighted; blindness
- ☐ Physical - e.g. wheelchair user
- ☐ Mental Illness - e.g. bi-polar disorder; schizophrenia; depression
- ☐ Development or Educational - e.g. autistic spectrum disorders (ASD); dyslexia and dyspraxia, neurodiversity
- ☐ Learning Disability / Condition - e.g. Down's syndrome; Cerebral palsy
- ☐ Long-term Illness / Health Condition - e.g. cancer, HIV, diabetes, chronic heart disease, stroke
- ☐ Other

How did you hear about this consultation?
(tick all that apply)

- | | |
|----------------------------------|---|
| <input type="checkbox"/> Leaflet | <input type="checkbox"/> Poster |
| <input type="checkbox"/> Email | <input type="checkbox"/> Havering website |
| | <input type="checkbox"/> Local newspaper |
| | <input type="checkbox"/> Word of mouth |

☐ Other (*please specify below*)

How long have you owned property in Havering?

- | | |
|---|---|
| <input type="checkbox"/> Less than one year | <input type="checkbox"/> 6 - 10 years |
| <input type="checkbox"/> 1 - 2 years | <input type="checkbox"/> 10+ years |
| <input type="checkbox"/> 3 - 5 years | <input type="checkbox"/> Not applicable |

Appendix 4 - Full written representations

Safeagent



HAVERING COUNCIL'S SELECTIVE AND ADDITIONAL LICENSING PROPOSALS

A RESPONSE TO THE CONSULTATION FROM SAFEAGENT – JULY 2025

AN INTRODUCTION TO SAFEAGENT

safeagent www.safeagents.co.uk is a UK wide, not for profit accreditation scheme for lettings and management agents operating in the Private Rented Sector (PRS)

safeagent firms are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Firms must provide evidence that they continue to meet safeagent criteria on an annual basis, in order to retain their accreditation. The scheme includes 1700 firms, with over 2500 offices.

safeagent is an accredited training provider under the Rent Smart Wales scheme and meets the requirements for training of agents under the Scottish Government Register. safeagent also operates a Government approved Client Money Protection Scheme.

SAFEAGENT AND LICENSING

safeagent is supportive of initiatives such as Selective and Additional Licensing, providing they are implemented in a way that takes account of the Private Rented Sector (PRS)'s own efforts to promote high standards.

safeagent believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as safeagent) is essential to the success of initiatives such as Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in the House of Commons Communities and Local Government Committee report "The Private Rented Sector - First Report of Session 2013–14" ([50.pdf \(parliament.uk\)](https://www.parliament.uk/publications/50/pdf))

The same note sets out how important it is for licensing schemes to avoid being burdensome. We believe that promoting voluntary schemes - and offering discounted licence fees to accredited landlords and agents, can help to achieve this. Voluntary schemes often require members to observe standards that are at least compatible with (and are often over and above) those of licensing schemes. We believe, therefore, that if Havering Council were to allow discounts based on membership of safeagent (as well as other similar bodies) implementing and policing the licensing scheme would ultimately be less costly and more effective, allowing resources to be concentrated in the areas where they are most needed.

This is a commonly accepted approach by many English Local Authorities. We would further point out that, in Wales, the Welsh Government has recently recognised the importance of

membership of specified bodies such as **safeagent** and is offering discounted fees to members as a consequence <https://www.rentsmart.gov.wales/en/>

PROMOTING PROFESSIONALISM IN THE PRS - THE ROLE OF AGENTS

safeagent's engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making licensing, accreditation and other, often voluntary regulatory schemes work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of licensing based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local licensing arrangements.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant fees, the redress scheme they belong to and whether they belong to a client money protection scheme. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme.

At **safeagent** we operate one of the six government approved Client Money Protection Schemes. **safeagent** ensures its members maintain defined service standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also have an extensive online training offering to support their professional development. All this can be of assistance to councils who are trying to drive up standards in the PRS.

To assist councils in regulating the private rented sector and effectively utilising their enforcement powers, we have developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the **safeagent** Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021. It can be downloaded free of charge from our website:

<https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-Effective-Enforcement-Toolkit-2021.pdf>

HAVERING COUNCIL'S PROPOSALS - SPECIFIC ISSUES

Resourcing Enforcement

Robust enforcement will be essential to the success of any licensing scheme, be it Additional or Selective. Tenants will need to be confident that any enforcement action required has been (or soon will be) carried out in respect of all licensed properties. Local Authorities should be resourced to take action against lettings agents who are not part of a Client Money Protection Scheme. They should also promote the role of the relevant redress schemes to tenants of agent managed properties, taking enforcement action where an agent is not a member.

With the Renters' Rights Bill making its way through parliament, we at **safeagent** are calling on the government to make sure that Local Authority enforcement is properly resourced. We also see it as essential that there is joined up thinking between local Trading Standards services and Private Sector Housing teams. Any new powers must be backed up by the human and technical resources required to implement them. Working in partnership with

accrediting bodies and their members, it should then be possible to ensure standards across the whole of the PRS.

Partnership Working with Lettings and Management Agents

We would urge Havering Council to work closely with accredited lettings & management agents to ensure that the regulatory effort associated with the licensing schemes is focussed on the greatest risks. The highest priority should be tackling rogue landlords and agents (including *“the minority of ‘rogue’ landlords who fail to invest in their properties”* referred to in the evidence document) not policing the compliant.

Many rogue landlords and unaccredited agents operate “under the radar”. Resources should, therefore, be directed towards these serious cases. There is danger that too much time will be spent on those properties and landlords where an existing, reputable agent is best placed to ensure compliance with license conditions.

We welcome the council’s stated intention to *“work with landlords to help support them and build their professionalism”*. In pursuit of this aim, we would urge the council to fully recognise the compliance work reputable agents carry out as part of their day to day activities. We would also suggest that the council work closely with accredited agents, to proactively seek out and identify unlicensed properties.

Licensing Fees

The proposed fees of £1400 (Additional) and £950 (Selective) seem high. These sums will place considerable financial burdens on landlords that, together with the cost of compliance with the licensing schemes, may result in a significant disincentive to continued investment in the PRS. In this context, we would welcome sight of a detailed cost breakdown which would justify these figures, similar to the example we attach in our covering email.

We are pleased to note, however, that discounts are available to landlords or agents who are members of nationally recognised professional associations. We are supportive of this approach and pleased to note that **safeagent** is listed as a recognised scheme.

We would suggest that this is justified because **safeagent** members and the landlords who engage them are less likely to be non-compliant, thus reducing costs to the council. We would also suggest that **safeagent** membership mitigates the need for full compliance visits to be carried out by the council. For example, the timing and content of visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by **safeagent** agents.

In our detailed comments below, we point out some of the areas where compliance with key licencing conditions is an inherent part of the **safeagent** scheme.

Applications made within the Designation Period and Changes in License Holder

We understand from the consultation event that all licenses will be granted for a full five years. It should be clarified that any licenses granted during the designation period (including licenses granted following a change of license holder) will remain valid when the designation is renewed or comes to an end. It should also be made clear that, if a designation comes to an end, inspections and resultant remedial actions should continue to be in operation until all licenses have expired.

We have found that some local authorities charge the full license fee for periods of less than five years. In our view, that is neither fair nor reasonable. A small number of authorities make pro-rata fee adjustments. This is arguably fair but seems unduly complex.

Fee Waiver – Tackling Homelessness

We would suggest that, in cases where a private landlord is assisting the council by offering temporary or permanent accommodation to meet homelessness duties (or otherwise assist with meeting the aims of a homelessness strategy) license applications should be accepted without any fee being payable.

Empty Properties

We believe that selective and additional licensing has the potential to help increase the number of empty homes brought back into use and improved to modern standards, thus improving their potential to be let.

Lettings & management agents can assist with all this. For example, many lettings & management agents will know of empty properties in their localities of operation. Furthermore, they will sometimes have detailed local knowledge and might be able to help the council to categorise the empty property appropriately (under 6 months, over 6 months, probate, exempt, second home etc)

Agents will often be in contact with neighbours and may:

- know if the empty property is causing problems (in some cases agents' tenants and even the agents themselves may have complained) and
- be able to help the council to find relevant contact details. This will help to raise the quality of the council's data – and contribute to the prioritisation of actions.

Furthermore, agents may be able to help to bring the property back into the PRS, working with the council to allocate it to homeless people where appropriate.

LICENCE CONDITIONS

Tenant Referencing

We are supportive of the requirement that references should be obtained for prospective tenants.

Tenancy Management

safeagent agents are expected provide and fill in a tenancy agreement on behalf of the landlord. they will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement.

They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails.

At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Under **safeagent's** service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining **safeagent**, agents are asked to provide details of the number and value of the deposits they have registered with the scheme.

Agents are asked to authorise **safeagent** to contact the scheme to verify this information.

During the course of a tenancy, **safeagent** agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes. **safeagent** agents are also required to:

- have a designated client account with the bank
- operate to strictly defined Accounting Standards
- be part of a mandatory Client Money Protection Scheme.

These requirements provide additional security for client monies held, over and above the requirements of the council's licensing scheme. Again, this is an area where increased **safeagent** membership would be of benefit to the council and local tenants.

Licence Conditions Relating to the Property

We welcome Havering Council's drive to improve property standards. We believe that **safeagent's** standards go a long way to ensuring compliance with license conditions.

Under **safeagent's** service standards, **safeagent** agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that **safeagent** agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.

safeagent agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.

safeagent agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.

Thereafter, **safeagent's** standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. **safeagent** and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format.

Tenants will be fully aware of access arrangements. **safeagent** agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. **safeagent** agents will arrange to have routine

maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We would welcome any proposal that agents who are license holders should undergo training.

Membership of **safeagent** means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a *condition* of **safeagent** membership, **safeagent** offers short courses and qualifications in Lettings & Management at Levels 2 and 3 which are Ofqual recognised

safeagent offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, **safeagent's** Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the **safeagent** Foundation Lettings Course successfully also has the opportunity to use the designation 'safeagent qualified'. **safeagent** Foundation Lettings Course (Wales) is recognised by Rent Smart Wales, the Welsh Government's regulatory body, as meeting their requirements for agents to undergo training.

One advantage of this approach is that it makes it easy to ascertain (through on-line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation.

Modules available cover:

- Pre-tenancy issues
- Responsibilities and liabilities
- Setting up a tenancy
- During a tenancy
- Ending a tenancy
- General law concepts, statute vs contract
- Relationships
- Obligations
- Process
- Considerations for corporate tenants
- Continuing Professional Development (CPD)

In addition, **safeagent** provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as:

Assured Shorthold Tenancies (ASTs)
Client Money
Consumer Protection Regulations (CPRs)
Deposits
Disrepair
Electrical Appliances & Safety
Gas Appliances & Safety
Houses in Multiple Occupation (HMOs)
Housing, Health & Safety Rating System (HHSRS)
Inventories and schedules of condition
Joint Tenancies
Notice Requiring Possession

We would further suggest that discounted fees for **safeagent** agents would provide an incentive to positive engagement with training that is fully compatible with the requirements of the licensing scheme.

Anti-Social Behaviour

For our members, dealing with actual and perceived anti-social behaviour in the PRS is a day to day activity. However, in general, we have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

There may be some *correlation* between incidences of ASB and the prevalence of PRS accommodation on the area. However, correlation does not imply *causation*. The *causes* of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.

Furthermore, we would strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to manage their properties professionally cannot reasonably be expected to tackle wider social problems.

Suitability of Licence Holder

We support the requirement that the proposed licence holder should be a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like **safeagent**, who themselves apply a fit and proper person test.

All principals, partners and directors of a **safeagent** firm are asked to make the following declaration on application:

– “I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform.

If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct”

We believe this certification is broadly in line with Havering council's licensing conditions and is another example of where promotion of **safeagent** membership through discounts could help to ensure compliance. Acceptance that agents have already made a fit and proper person declaration could save 120 minutes of staff time per license application, according to the cost formulation and calculation.

Complaints

All **safeagent** firms are required to have a written customer complaints procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues.

In line with statutory requirements, all **safeagent** members must also be members of a recognised redress scheme. Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed.

Under co-regulation schemes elsewhere in the UK, **safeagent** has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, **safeagent** can report to the council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from **safeagent**. We would be happy to come to a similar arrangement with Havering Council.

MEASURING THE SUCCESS OF THE SCHEME

We believe that regular information on implementation of the scheme should be made available in a clear and consistent format. Reports to local landlord and agent forums, representative bodies and other stakeholders should include at minimum:

- The estimated number of private rented properties that require licensing under the schemes
- The number of applications received in respect of these properties
- Progress in processing (granting, querying or refusing) the licence applications received
- Analysis of the reasons for any queries or refusals and the extent to which remedial action is identified and taken as a result
- Analysis of the outcomes of ongoing inspections and the extent to which remedial action is identified and taken as a result
- Progress reports across the whole 5 year period covered by the scheme.

This should help to enable the council to work in partnership with landlords, agents, representative bodies and other stakeholders to ensure the success of the scheme.

CONCLUSION

It seems to us that many of the licencing requirements in the Havering Council schemes highlight how important it is for landlords to work with reputable agents such as **safeagent** members. Offering fee discounts to licence holders who work with a **safeagent** accredited agent will help to promote this.

safeagent would welcome a collaborative approach with Havering Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace licensing and less likely to generate complaints to the council or breaches of their licence. Discounted fees for **safeagent** members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

CONTACT DETAILS

safeagent
Cheltenham Office Park
Hatherley Lane
Cheltenham
GL51 6SH



Suite 323, Tootal Buildings,
Broadhurst House,
56 Oxford Street,
Manchester, M1 6EU

☎ 0300 131 6400
✉ info@nrla.org.uk
🌐 www.nrla.org.uk

London Borough of Havering

5th July 2025

Dear Sir or Madam,

Selective and Additional Licensing Proposals

The NRLA is an association following the merger of the National Landlords Association and the Residential Landlords Association. Our membership represents over 110,000 landlords and agents, the largest organisation in the sector.

We appreciate the chance to provide our input on the consultation concerning the continuation of selective licensing and additional licensing in Havering. The NRLA opposes the implementation of discretionary licensing by local authorities. While we understand the intentions of Havering, we believe that further licensing is not conducive to achieving these goals effectively.

The NRLA strives for a just legislative and regulatory framework for the private rented sector, ensuring that landlords are aware of their legal rights and obligations.

Main Objections

Antisocial behaviour and low housing

Landlords lack the expertise to handle antisocial behaviour and are not equipped to address tenants' mental health issues or substance abuse problems. If a tenant is causing issues and the landlord decides to terminate the tenancy, they believe they have fulfilled their responsibilities, even if the tenant is struggling with these issues. This simply shifts the problem elsewhere in the Havering area, potentially leaving the tenant neglected or vulnerable to unscrupulous landlords, impacting other residents negatively.

Additionally, overcrowding poses a challenge for landlords when tenants exceed the property's capacity. Landlords are responsible for informing tenants about occupancy limits and prohibiting subletting or additional occupants. What information and support can the council provide to support landlords in such situations?

It is unrealistic for landlords to monitor tenants' daily activities or sleeping arrangements. When it comes to addressing antisocial behaviour, landlords can only enforce the terms of the contract; they cannot control tenants' behaviour.

Company No. 12187275

Waste management

It is worth exploring, if such a mechanism is not already in place, a cost-effective or complimentary service to assist private landlords in removing bulky items left behind by tenants upon vacating the property. This could potentially streamline the process and prevent waste from being discarded prematurely. Councils such as Leeds City council offer such a service to its licenced landlords and has reduced fly tipping as a result.

Existing Enforcement Powers and Activity

The council possesses a variety of housing enforcement legislation that can be used to address substandard conditions in the PRS, including the Housing, Health, and Safety Rating System (HHSRS). These enforcement powers are currently at the disposal of the local authority and do not necessitate consultation prior to implementation.

Inspection regime and licence processing

Does the council intend to inspect every property at least once throughout the lifetime of the scheme after a licence has been in place for a period, and what kind of inspection regime will the council adopt i.e. street by street or by risk assessment? Does the council have a set timescale in place for the processing of licences.

Conclusions and alternatives

The NRLA holds the belief that a thriving private rented sector is necessary for local authorities to complement the existing housing options in an area. This sector offers a diverse range of housing types that can cater to the needs of both residents and landlords in the city. It is crucial to regulate this sector and enforce necessary measures to prevent criminals from exploiting landlords and tenants. Implementing an active enforcement policy that supports reputable landlords is of utmost importance as it will eliminate those who take advantage of others and establish a fair and level playing field.

The NRLA proposes the utilisation of council tax records to identify the tenures utilised by the private rented sector and the landlords responsible for these properties. Unlike discretionary licensing, this approach does not require landlords to self-identify, making it more challenging for criminal landlords to operate unnoticed. By adopting this method, the council would not need to immediately consult and implement changes.

If the proposed scheme is approved and put into action, the council should provide an annual summary of outcomes to showcase the improvements in tenants' and landlords'



Suite 323, Tootal Buildings,
Broadhurst House,
56 Oxford Street,
Manchester, M1 6EU

☎ 0300 131 6400
✉ info@nrla.org.uk
🌐 www.nrla.org.uk

behaviour and the impact of licensing on the designated area throughout the scheme's duration. This would enhance overall transparency.

While the NRLA shares a common interest with Havering in ensuring a high-quality private rented sector, it strongly disagrees that further selective and additional licensing is the most effective approach to achieve this goal in both the short and long term.

Yours Faithfully,

██████████
Senior Policy Officer
National Residential Landlords Association
████████████████████

Company No. 12187275

Havering Council – Additional and selective Licensing Consultation 2025
Consultation on a proposal to reintroduce a borough-wide Additional Licensing scheme for the
London Borough of Havering and to expand the selective licensing scheme to Seven wards
Response from Propertymark
May 2025

Background

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Overview

2. Havering Council are proposing an additional Licensing scheme for small Houses in multiple occupation (HMOs) covering all wards which is due expire in January 2026. A seven-ward expansion of the Selective Licensing scheme is also proposed to include: Beam Park, Harold Wood, Rainham & Wennington, Rush Green & Crowlands, Squirrels Heath, St Albans and St Edwards as the Council believes that they meet the criteria and would benefit from the adoption of scheme.

Summary

3. Thank you for the opportunity to respond to the consultation on reintroducing a borough-wide additional licensing scheme and the expansion of Havering's selective licensing scheme in the London Borough. Propertymark is supportive of efforts made by local authorities to improve housing stock within the private rented sector (PRS). However, we do not think that licensing is the best method to achieve this aim. Accordingly, we object to your proposal. Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected. We oppose this proposal on several grounds which are set out below.

Licensing structure

¹ <https://www.propertymark.co.uk/>

4. **Scope of the scheme** – It is disappointing that Havering Council must renew their previous additional licensing scheme for a further five years. This clearly demonstrates that the aims and objections from the previous scheme were not met, and they should find a new way of improving standards. Furthermore, we think that both proposed schemes on a local authority level would be duplicative with the provisions of a national landlord's registration scheme being proposed in the Renter's Rights Bill as outlined in the King's Speech² and is currently at the Report Stage in the House of Lords.³ We would be grateful if Havering Council would clarify if this would be the final phase of the additional licensing scheme as we have intelligence of some local authorities considering a third phase. Additionally, some of the justifications for the scheme would not be from a direct consequence of issues within the PRS, but other housing tenures. We note that in some communities within the London Borough of Havering, the percentage of social housing is greater than the percentage of PRS housing. Therefore, it is likely that any social problems within this area are contributed by social housing. Essentially, using a borough-wide scheme is difficult to find the root cause of issues and the Havering should consider targeting their scheme.
5. **Costs of the scheme** – We hope that Havering Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.
6. **Fees** – The fees criteria⁴ are complicated and is subject to different levels of fees depending on several criteria including bed spaces. We think this could be misinterpreted by some landlords. With fees of up to £950 for an additional licence and £1,400 for a selective license, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also high when compared to other local authority licensing schemes including £650 in Newcastle⁵ and £550 in Liverpool.⁶ The fee is also higher compared to fees for many additional licenses schemes in London Boroughs where costs are typically high. We welcome the inclusion of discounts for

² The King's Speech 2024 - GOV.UK (www.gov.uk)

³ <https://bills.parliament.uk/bills/3764>

⁴ General document

⁵ Fees and Charges.pdf (newcastle.gov.uk)

⁶ Fees, discounts and exemptions - Liverpool City Council

landlords who are members of an accredited landlord's scheme, properties that have achieved EPC C and multiple properties. We are also pleased to see that the council will offer a discount to landlords and agents who are members of accredited membership organisations but would be grateful for clarity if that would extend to Propertymark members. Propertymark members can demonstrate that they are suitably qualified, have access to regular training and meets compliance and regulatory standards, so encourage the Council to consider discounts for Propertymark member letting agents. We also note that there is no discount for additional licensed properties which specifically disadvantages landlords with large portfolios. We would welcome clarity on how agents can pay fees and would recommend that in some instances agents may wish to pay by invoice especially if they are administering many property licenses.

7. **Impact of cost-of-living and landlords** - Regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by ongoing mortgage costs, the cost-of-living crisis and the impact fees could have on the ability of landlords to improve standards. Our members have also told us that a common concern from landlords on licensing schemes is that the costs can be extremely high for landlords especially those, as we have just highlighted, as having larger portfolios of properties. These costs are especially high for landlords operating in London Borough's such as Havering.
8. **Impact on supply of homes** - Exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS⁷ found 53% of buy to let properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019. In addition to these concerns, those landlords who remain in the market, often have less money to improve conditions from increased costs. If the decision to operate a borough-wide additional licensing scheme and expand the selective licensing scheme across Havering is approved in areas that are already low demand, then there is a concern that landlords currently operating within these areas could invest in neighbouring local authority areas or exit the market altogether. This could result in fewer housing options for people living in Havering communities meaning some people might be forced to find housing options outside the area, change employment or break social ties within the community.

⁷ [A shrinking private rented sector | Propertymark](#)

9. **Unintended Consequences** – We are pleased to see that Havering Council acknowledge that the PRS is an important and increasingly growing tenure that is home to many people living within the Borough and estimated to make up 19.3% of the borough's housing market and continues to grow⁸. Renting in Havering can be expensive with a median rent in some Havering post codes being £1,400 per calendar month (September 2024⁹.) It is likely that many low waged and people in receipt of benefits access the PRS in Havering live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis. We previously outlined the possibility that further legislation could reduce the housing options of the most vulnerable from landlords exiting the market there could be further implications on the rent level for those landlords who remain. As is the general law of supply and demand, if the supply of PRS property reduces, the cost of rent for the remaining properties is likely to rise. With the current demographics of persons accessing the PRS in Havering, there is a very real danger that many low-income families will be priced out of living in the area.

Improving standards

10. **Property condition** – Large parts of Havering are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Havering Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.
11. **Energy efficiency** - Since 1 April 2020, landlords in England and Wales can no longer let or continue to let properties covered by the Minimum Energy Efficiency Standards if they have an Energy Performance Certificate (EPC) rating below E, unless they have a valid exemption in place. The current UK Government are making provisions for revised energy efficiency standards for landlords to meet EPC C by 2030. According to the consultation document "Havering has a slightly lower proportion of households in fuel poverty (9.3%) than the London average (12%). 3 These figures are likely to significantly change at the next point of publishing as a result of the 2022 acute

⁸ [Havering Council Selective and Additional Licensing Consultation - London Borough of Havering Council - Citizen Space](#)

⁹ [London rents map | London City Hall](#)

fuel price increases¹⁰ However, only a very small number of properties would be below EPC E, and these may be exempt.

12. **Current enforcement** – Havering Council is experienced in the implementation of Licensing Schemes with the previous schemes. We would be grateful for some clarity on the performance of previous schemes. For example, how many working days did it take for a typical licence application to be processed and issued? The Council also highlight some of the key statistics on their enforcement activity including warning letters, prosecutions, and civil penalties issues. We would be grateful if this data could be broken down by years. We would also be grateful for clarity on the reasons for issuing civil penalties for example, how many were for over-crowding, banning orders or for simply not obtaining the correct license.

13. We would like clarity on the number of hazard warning letters were sent, notices and civil penalty notices issued broken down by year from the previous schemes. We would also welcome clarity on what the Council's future enforcement policy will entail. How will the Council educate landlords to ensure they are complaint, and for those landlords who struggling with the management of properties, will the Council recommend landlords discharge their duties to Propertymark registered agents?

Engagement

14. **Engagement with landlords and letting agents** - For most cases of substandard accommodation, it is often down to landlord's lack of understanding rather than any intent to provide poor standards. We note that Havering Council did not respond to our recent Freedom of Information request on landlord engagement since 2021. Therefore, we would like clarity on how Havering Council engages with landlords and property agents including landlord forums, and training opportunities. In addition, we would welcome clarity on how the council encourages landlords and agents to be members of an accredited membership scheme such as Propertymark.

15. To strengthen this engagement, we would be very happy to support the council in engaging with our members and local property agents. A licensing scheme is a very reactive mechanism, and it is far more beneficial to have a programme of education to engage with landlords on helping them improve before a situation gets worse. We would welcome clarity on what training opportunities

¹⁰ [LB Havering PBSL Consultation Evidence Pack v1.pdf](#)

the council will provide to landlords and agents to help them understand their responsibilities and improve standards. We recognise the council have made strong efforts in this in the past with engagement via the Council's Landlord Forum and an accreditation scheme for local landlords. However, engagement is more credible over a longer more embedded period. Propertymark has a network of Regional Executives and a series of Regional Conferences that take place throughout the year.¹¹ We would be very happy to work with the council to engage with local agents over a virtual roundtable discussion on how standards can be improved.

Tackling Anti-Social Behaviour (ASB)

16. Some areas of Havering are integral to the night-time economy within the Borough. Accordingly, it is likely that Anti-Social Behaviour (ASB) is contributed from a variety of sources outside private tenants. We would like clarity on how Havering Council works with their Community Safety Teams and stakeholder partners to offer a multi-agency approach. Unfortunately, landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse. As one example, if a landlord or their agent had a tenant that was causing anti-social behaviour, the only tool that the landlord or agent could use would be to seek possession from the tenant under a Section 8 notice. While this would remedy the problem in the short-term, the tenant is likely to still occupy this behaviour and all that has been achieved is that the anti-social behaviour has moved from one part of Havering to another or another local authority area. In this context, it should be noted that with regards to reducing anti-social behaviour, landlords and their agents can only tackle behaviour within their properties. Effectively, they are managing a contract and not behaviour. Landlords and their agents are not responsible in any form for anti-social behaviour occurring outside the property. Nevertheless, we would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police, London Fire Brigade, Justice for Tenants, Safer Renting, and the Citizens Advice Bureau in reducing anti-social behaviour within communities including outcomes from the Home Office funded Safer Streets Programme which we have seen effectively delivered in other London Boroughs.

Environmental crime

17. The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. The evidence document

¹¹ <https://www.propertymark.co.uk/about-us/board-and-governance.html>

states "There is a connection between HMOs and poor waste management. All property licences contain a condition that the holder must provide adequately sized bins and sufficient recycling containers for the occupiers." However, Havering Council have provided no evidence to support the extent that particular PRS properties are impacted by both fly tipping and other environmental crimes, and as is the case in most local authorities, we suspect this is an issue on local authority highways. While we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter, within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.

Selective Licensing and Section 21

18. Propertymark would like clarification on Havering Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the council's consultation. What steps will the council take to support the landlord? It would be useful if the council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk-averse to taking tenants with a perfect reference and history. We would be willing to work with the council and develop a dispute resolution service with other local authorities.

Conclusions and alternatives

19. Propertymark thinks that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. Appropriate regulation and enforcement are essential for improving standards and removing criminals from the sector who exploit landlords and tenants. An active enforcement policy that supports good landlords and letting agents is crucial as it will remove those who exploit others and help create a level playing field. It is essential to understand how the sector operates as landlords and letting agents can often be victims of criminal activity and antisocial behaviour with their properties being exploited.
20. If the scheme is approved, the Council should consider providing an annual summary of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact

of licensing on the designated area over the scheme's lifetime. This would improve transparency overall. Propertymark has a shared interest with Havering Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of the proposed measures is the most effective approach to achieve this aim both in the short term and long term.

21. We would welcome the opportunity to work with Havering Council to further engage with our members and property agents in the local area.

Appendix 5 – Letter of support

London Borough of Harrow

From: [REDACTED]
Sent: 30 June 2025 18:54
To: [prsconsultation <prsconsultation@havering.gov.uk>](mailto:prsconsultation@havering.gov.uk)
Cc: [REDACTED]
Subject: Support for the Renewal of the Additional HMO Licensing Scheme

[REDACTED]
[REDACTED]
Dear Sir/Madam,

I am writing on behalf of The London Borough of Harrow Council to express our strong support for The London Borough of Havering's proposal to implement new property licensing schemes when the current additional (HMO) and selective licensing scheme expire. As a Greater London authority with a shared commitment to improving housing standards and supporting residents, we recognise the significant benefits that such schemes bring to communities, tenants, and local governance.

Harrow has seen the positive impact of robust HMO licensing from our own scheme. Since implementing our own Additional HMO and Selective Licensing Schemes, we have seen measurable improvements in property conditions, tenant safety, and community cohesion. The scheme has enabled us to identify and address issues such as overcrowding, inadequate fire safety measures, and poor property management, which are often prevalent in areas with high concentrations of HMOs. By requiring landlords to meet stringent standards, the scheme has not only enhanced living conditions for those who are most in need but also reduced anti-social behaviour and the strain on local services.

We understand that Havering has identified specific challenges in your area, including poor property conditions and inadequate property management. Implementing new property Licensing Schemes will provide your authority with the necessary tools to regulate these properties effectively, ensuring that landlords maintain safe, habitable, and well-managed accommodations.

Furthermore, the renewal of your scheme will complement regional efforts to uphold consistent housing standards across our authorities. Collaborative approaches to HMO regulation help prevent the displacement of poorly managed properties to neighbouring areas, ensuring a cohesive strategy for tackling housing challenges. We are confident that continuing this scheme will strengthen your ability to enforce compliance, support tenants, and enhance the overall quality of life in your communities.

Should you require any further information about our experiences with the Additional HMO Licensing Scheme, please do not hesitate to contact me at the offices below.

We wholeheartedly endorse your efforts to renew the scheme and wish you success in its implementation.

Regards

[Redacted]
[Redacted]
[Redacted]

[Redacted] www.harrow.gov.uk

London Borough of Harrow, Forward Drive, Harrow, HA3 8FL

