

# **Creating a Fairer Private Rented Sector**

## **Additional HMO and Selective licensing Consultation**

### **Havering Council's response to comments and representations received during the public consultation**

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## **1. Introduction**

In order to improve the standard of privately rented property in the borough, Havering Council is proposing to introduce an additional HMO licensing scheme which will apply to houses in multiple occupation (HMOs) across the whole borough as well as a selective licensing scheme which will apply to all privately rented properties in seven out of 20 wards of the borough. During the consultation, the Council received a range of responses regarding the proposed new schemes and the wider private rented sector in Havering. The Housing Act 2004 requires the Council to consider any representations made in accordance with the consultation which are not withdrawn. The following is the Council's formal response to these representations, which have been considered and have informed a number of changes to the proposed schemes.

## **2. Positive responses to the proposed schemes**

The council would like to acknowledge some of the comments received during the consultation in support of the proposed scheme. These have helped to validate the council's approach and highlight the strengths of the proposal, which will be built upon to make the scheme even more effective.

- Excellent scheme if borough manages it well
- This is all great but must be enforced. I walk down my road and can tell the properties that are privately rented. Scruffy and poorly maintained. This plan has synergies with the where we live initiative - if people have pride in where they live standards will increase. The house adjoining me is privately rented and is a mess that has caused issues over some years with shady landlords and low grade tenants who do not care about the neighbourhood. Have a look at XXX for an example of what I think you are looking to improve. I wholeheartedly support this initiative and look forward to seeing the plan put into action.
- I think this is an excellent idea. I am a landlord in Barking & Dagenham and have a selective licence. This is the only way to approve conditions for tenants and stop poor properties being rented out.
- 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.

## **3. Main themes from consultation feedback**

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce the selective and additional HMO licensing schemes. The consultation also looked at views on the proposed licence conditions and fees.

The consultation questionnaire featured free text boxes which provided respondents with opportunities to comment on the proposals in their own words, specifically:

- 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?
- If you disagree with any of the discretionary conditions for additional HMO licensing please can you explain why?
- 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
- If you disagree with any of the above [selective licensing scheme outcomes], please can you explain why and what alternatives you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for selective licensing, please can you explain why?
- 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
- If you disagree with any of the objectives for the licensing scheme, please can you explain why?
- 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
- 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?

The comments and feedback from the online survey, written representations received and those made during online public forum events have been analysed and categorised into themes. The council's response to these comments and themes are shown below:

### 3.1 General comments about licence conditions

The following outlines **general** comments received about the licence conditions.

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Selective Licence Condition 3</b> <b>Additional HMO Licence Condition 4</b>	There is concern about how 'acceptable references' will be defined under Selective condition 3 and Additional HMO condition 4, especially as many vulnerable populations are unlikely to have UK-based references.	<i>Point 4.1 - how are you going to deem what an acceptable reference is, for asylum seekers who are housed will likely have no references from anyone in the UK as the majority are paying traffickers to get to the UK. And to add to this - many of these people, with no references will probably be housed under your Point 2.4 d so they won't need any references.</i>	Consultation survey comments	<p>The Council agrees that the absence of references should not automatically disqualify individuals from being considered for a tenancy, particularly in cases involving vulnerable groups.</p> <p>Enforcement action is considered on a case-by-case basis and factors impacting on the ability to obtain references will be taken into consideration. However, the Council agrees to reword the condition as follows:</p> <p>No new occupiers shall be allowed to occupy the house if they are unable to provide suitable references. (References should be as a minimum, checks to ensure the tenants identity, whether they have the right to rent a property [see <a href="https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check">https://www.gov.uk/check-tenant-right-to-rent-documents/who-to-check</a> ], their ability to pay rent and their past history as a tenant.)</p> <p>The licence holder must provide evidence of such reference and checks carried out</p>

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				when requested by the Council within 14 days on demand.
<b>Misinterpretation of 'discretionary' conditions</b>	Many respondents noted that they understood the discretionary licence conditions to be optional for either the landlord to comply to or the council to impose upon a given licence.	<i>Discretionary conditions may also open the door to subjective enforcement, with different interpretations applied by different officers, leading to uncertainty for landlords and inconsistent outcomes. Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants.</i>	Consultation survey comments	<p>We appreciate the feedback received regarding the interpretation and application of discretionary licence conditions.</p> <p>To clarify, the selective and additional HMO licensing schemes include two types of conditions:</p> <ul style="list-style-type: none"> <li>• Mandatory conditions, which are required by national legislation and apply uniformly across all licences.</li> <li>• Discretionary conditions, which local authorities have the power to design and implement in response to specific local housing needs and priorities.</li> </ul> <p>While the term "discretionary" may suggest flexibility, once these conditions are adopted as part of the licensing scheme, they are not optional for landlords. They are enforceable and will be applied consistently across all licences issued under the scheme. The Council may, however,</p>
		<i>Discretionary won't hold any weight and when would the council use it. Will it fall away and be applied too late and not effective.</i>		
		<i>The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements and references should prevail. Same standard for all.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
				<p>apply additional conditions in specific cases where circumstances warrant further oversight.</p> <p>These discretionary conditions are intended to complement mandatory standards and enable the Council to address issues such as anti-social behaviour, waste management, and property upkeep more effectively.</p>
<b>Excessive burden</b>	Landlords argue that there are too many licence conditions, they are excessive and place an unfair burden on responsible landlords. They believe that the current regulations and requirements are already sufficient and that additional conditions will only increase costs and administrative work for landlords. Additionally, in many cases, respondents argued that the conditions duplicated those already required by or proposed in other legislation.	<p><i>I also disagree with the proposed discretionary conditions because they often duplicate existing legal requirements, creating unnecessary complexity and scope for inconsistency. Many of these conditions are vague, overly prescriptive, or not evidence-based, which risks turning routine property management into a bureaucratic burden.</i></p> <p><i>Discretionary conditions may also open the door to subjective enforcement, with different interpretations applied by different officers, leading to uncertainty for landlords and inconsistent outcomes. Rather than helping improve housing standards, this creates confusion and cost without clear benefits to tenants.</i></p>	Consultation survey comments	<p>The Council considers the proposed licence conditions to be comprehensive but not excessive. Many of the conditions are mandatory by law and must be included on all licences, which is beyond the Council's control.</p> <p>The licence conditions are not intended to place an unfair burden on landlords; they are intended to ensure that private rented properties meet essential safety standards. By adhering to these conditions, landlords can provide safe, habitable, homes for tenants, ultimately benefiting both landlords and the community.</p> <p>The Council acknowledges that landlords are subject to existing regulations and laws. However, the existing regulations and powers do not require landlords to declare</p>

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		<i>I strongly disagree with the proposed discretionary conditions. They create unnecessary complexity and financial burden for compliant landlords. The council should focus on enforcing existing laws rather than introducing more regulations that affect good landlords and increase rental costs for tenants. I do not support the additional conditions. They are unfair and unnecessary.</i>		<p>themselves to the council. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months.</p> <p>Whilst the Council acknowledges that many landlords operating in the borough keep their properties to a high standard, the evidence presented during the consultation shows that there are large scale issues with poor property conditions in the borough's private rented sector, that licensing can help to address. The council believes that many landlords will meet the licence conditions, and do keep their properties in good condition, but licensing enables the council to take action against those landlords who place their tenants in unsafe properties.</p>
<b>Parking conditions</b>	Respondents expressed the need for restrictions on street parking, particularly around HMOs	<i>HMO should address parking restrictions, a house containing up to 4 people can have strain on parking down a street</i>	Consultation survey comments	While the Council understands the frustration caused by parking issues, it is not feasible to impose conditions to limit the number of vehicles per property or



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		<p><i>Must be some sort of considerations made around parking. If there is a house with multiple adult tenants then there are potentially multiple cars also. On streets with permit parking, and limited parking multiple HMOs impact parking - especially where there are not allocated spaces.</i></p> <p><i>Parking restrictions, though. It always practical, would be very useful. Potentially reviewing the need to add parking control zones where HMOs exist.</i></p> <p><i>At the very least there needs to be conditions that HMO tenants cannot repair or sell vehicles from the property.</i></p>		<p>require off-street parking, as such restrictions exceed the legal scope of the Housing Act 2004 and the licensing regime.</p> <p>Parking considerations are however taken into account when an owner applies for planning permission to convert a property into an HMO. However, monitoring and enforcing vehicle limits or off-street parking requirements would be highly challenging. It would necessitate significant resources and continuous oversight, which are not currently available.</p>
<b>More conditions required</b>	There were also comments that there should be more conditions, and these should be stricter.	<i>Rent should be affordable for anyone on the minimum wage and a basic pension. The council pay private landlords too much cash over the odds ... it's time the council took control of all the housing stock.</i>	Consultation survey comments	<p>The Housing Act 2004 specifies mandatory conditions that must be applied to all licences. The council can only impose other discretionary conditions in order to deal with the management, use and occupation of the licensed property and additionally for HMOs its condition and contents.</p> <p>Whilst the Council appreciates the request to include other licence conditions these</p>

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		<i>The person's living in HMOs should also be responsible decent, people with no criminal background, no junkies, drunks, or antisocial tenants in our neighbourhood.</i>		fall outside the scope of the Housing Act 2004 and cannot be included.
		<i>Make Land Registry update the landlord info every year. Any addresses they give is years out of date.</i>		

## 3.2 Fees, discounts and the financial impact of the schemes

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Cost of licence fee</b>	Respondents expressed concern that the proposed selective and/or additional HMO licence fee is too high and will create an unnecessary financial burden on landlords which could be passed on to tenants.	<i>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 Newcastle and £550 in Liverpool.</i>	PropertyMark letter, Safeagent letter, Consultation Survey Responses, Public Forum Q&A	<p>The proposed fee has been calculated based on the cost of setting up and operating the licensing schemes. The aim is to ensure that the costs are covered by the expected income from the number of licence applications that the Council anticipates under the proposed designations. Councils are not permitted to make a profit from licensing schemes and careful consideration and financial modelling has gone into the licence fees and discounts.</p> <p>A selective licence obtained without any discounts will cost a one-off fee of £950 for a 5-year licence, which equates to less than £4 per week. An additional HMO licence obtained without any discounts will cost a one off-fee of £1,400 for a 5-year licence, which equates to less than £5.50 per week. The Council has also elected to offer a number of discounts to eligible landlords in order to reward and incentivise high property management standards.</p>
		<i>How is the £950 justified? Current national average licensing is £700 some London borough charge as low as £600, the scheme should be design not for profit</i>		
		<i>Also the cost of hmo considering the hugely bigger profit on it is not reflected in the fee, 850 discounted or 950 full price is massive for someone like me with one rented property, it doesn't make financial sense.</i>		
		<i>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</i>		

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		<i>significant disincentive to continued investment in the PRS.</i>		<p>Whilst the Council recognises that the licence fee is a cost to the landlord, this is not considered unaffordable compared to the average rental income obtainable in Havering at present. According to ONS the average monthly rental price in Havering is currently £1522<sup>1</sup>, meaning the selective licence fee would represent around a 1% reduction in rental revenue for the average property and additional HMO licence fee around a 1.5% reduction in rental revenue for the average property.</p> <p>The Council notes that the boroughs mentioned in the Propertymark submission are not neighbouring Havering. The total cost of an HMO licence in Liverpool is £1283 and not the £550 referenced.</p> <p>In regard to Newcastle, the fee of £650 quoted is for part 2 of a selective licence or part 2 of a renewal of a mandatory HMO licence; the whole fee for an additional HMO licence in Newcastle is £1000. Given the average monthly private rental cost in Newcastle was £1097 in April 2025, and the average for</p>

<sup>1</sup> [https://www.ons.gov.uk/visualisations/housingpriceslocal/E09000016/#rent\\_price](https://www.ons.gov.uk/visualisations/housingpriceslocal/E09000016/#rent_price)

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				<p>Havering was £1522 for the same period, as a proportion of average monthly rent, Havering's licence fee is lower than Newcastle's.</p> <p>The proposed selective licence fee is in line with many other London councils, including Southwark (£900) and Lambeth (£923). The Council is aware of a number of schemes which were recently consulted on where the proposed fees are in line or higher than Havering's, for example Westminster (£995 for a selective licence) and Barking &amp; Dagenham (£950 for a selective licence). This suggests that the costs of operating a property licensing schemes are significantly rising.</p> <p>The proposed additional HMO licence fee is also in line with many other London councils and lower than some council's including Lambeth (£1,518), Westminster (£1,510) and Merton (£1,450 to £1,550). In boroughs where councils have also invoked a 'fee-per-bedroom' financial model, many landlords will end up paying considerably more than Havering's flat-fee for their additional HMO licence.</p>

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				The Council is committed to ensuring the fees are fair and proportionate, and they will be reviewed throughout the schemes to ensure this remains the case.
<b>Costs of implementing the scheme and value for money</b>	Concern about whether the scheme is the most cost-effective method of improving the PRS.	<i>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.</i>	Propertymark letter	The licence scheme is designed to be cost neutral and will not make a profit; the fee has been designed to be as low as possible whilst ensuring the cost of the licensing scheme is covered.
<b>Money making schemes</b>	Respondents expressed a belief that licensing is merely a means for the council to generate revenue, rather than a genuine effort to improve housing standards.	<i>Don't bring this is, you're just trying to make money and you don't bother inspecting the properties.</i> <i>These are all excuses to place additional costs on landlords which will be passed onto tenants</i>	Consultation survey comments	Under the law, the Council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the

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		<i>Another revenue generator for a broken council. Poorly thought of scheme and ineffective real-world results that make private landlords want to exit the sector.</i>		<p>expected income from the number of licence applications the Council anticipate, under the proposed designations.</p> <p>The fee will be kept under annual review to ensure the schemes remain cost neutral.</p>
<b>Increased financial pressure on landlords</b>	Landlords already under financial pressure due to interest relief removal and mortgage rises.	<i>Anther cost landlords cant afford. Already I make a loss on my property and am thinking of selling.</i>	Consultation survey comments, Public Forum Q&A, PropertyMark letter	<p>We are mindful of financial pressures that landlords may currently be under. Landlords are encouraged to claim reasonable business expenses related to rental properties which may help reduce your tax bill. The costs of licence fees can be claimed against annual tax bill.</p> <p>The Council is proposing a number of discounts and support measures for property improvements and balance the financial strain landlords will experience while maintaining fair and safe housing standards for tenants.</p>
		<i>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 stand</i>		
		<i>This does not reward people who try to plan for their future and take risks, we are being hit with section 24, EPC standards, some people have day job which brings them to the higher tax bracket on which they pay higher tax on turnover due to section 24 not on profit, high interest rates, many landlords who are not in LTD companies do not even make a profit and now council</i>		

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		<i>going to hit us with a £950 fee, landlords are selling already and this will push some more landlords to sell making less properties available to rent and push rents even higher, time frame proposed do not allow landlords to adjust their plans we are locked with mortgages and with new renters bills we won't be able to vacate the property if we want to sell and get out private rented sector.</i>		
<b>Cost of raising standards of older properties</b>	Concern about the cost to landlords of raising the standard of pre-1919 housing stock, particularly in relation to energy-efficiency, and a request for clarity over available grants and loans	<i>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.</i>	PropertyMark letter	<p>The Council recognises the challenges associated with upgrading older properties, particularly in relation to meeting energy efficiency standards. While the Council does not currently offer grants specifically targeted at supporting landlords to improve older housing stock, we note that only 1.2% of private rented sector (PRS) properties in the borough fall below the current Minimum Energy Efficiency Standard (MEES) of EPC rating E.</p> <p>We encourage landlords to explore national funding opportunities and schemes that may be available to support energy efficiency improvements. Where possible, the Council will continue to signpost landlords to</p>



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				<p>relevant resources and provide guidance on compliance with MEES regulations.</p> <p>We remain committed to working collaboratively with landlords to improve housing quality across the borough, while being mindful of the financial pressures involved.</p>
<b>Additional costs will be passed on to tenants</b>	Respondents expressed concerns about the costs associated with licensing and how it would increase rents for tenants.	<i>Adding £1000 to is going to add this to the rent. Completely unnecessary not needed money making scheme. If for the last six years my tenants had an issue they can go to the deposit scheme or citizens advice. They don't need your license.</i>	Consultation survey comments, Public Forum Q&A	From administering its property licensing schemes, the Council has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere.
		<i>All that will happen will be rents will increase more than they have.</i>		This is supported by the findings from the many other Councils in London and nationally that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market.
		<i>Any costs for the Landlord will be passed on to the tenants at the next rent review making renting even more unaffordable for lots of people</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
		<i>Maybe they mean that good tenants will be penalised by having to increase rent to cover this licence</i>		If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can be challenged by the tenant via the Residential Property Tribunal.
<b>Effect on rental supply</b>	Concerns licensing could reduce the supply of rental properties as some landlords sell up due to extra costs/burden.	<i>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.</i>	Consultation survey comments, PropertyMark letter	From administering its current licensing schemes, the Council has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere.
		<i>The fees are excessive and disproportionate to the actual cost of running such a scheme. They risk pushing landlords out of the sector, reducing the supply of rental properties, and driving up rents — ultimately hurting the very tenants the scheme claims to protect.</i>		<p>This is supported by the findings from the many other Councils in London and nationally that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market.</p> <p>If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can</p>

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		<i>Landlords are already feeling the financial 'pinch' and this tax will be another burden on us and drive more landlords out of the market thus decreasing the availability of rental properties and increasing rents due to massive demand and low supply.</i>		be challenged by the tenant via the Residential Property Tribunal.
<b>Impact on low-income families</b>	Concern that an unintended consequence of licensing could be that low-income families will be priced out of Havering	<i>Renting in Havering can be expensive with a median rent in some Havering post codes being £1,400 per calendar month (September 2024.) 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.</i>	Propertymark letter	As detailed previously, both the selective and additional HMO licence fees make up a relatively small proportion of the average monthly rental income in Havering (the selective licence equates to less than £4 per week over the 5-year scheme and the additional HMO licence equates to around £5.50) and therefore should not have an impact on rents charged in a competitive market. However, if landlords want to increase the rent, there are procedures which must be followed and any increase above market rents levels can be challenged via the Residential Property Tribunal.
<b>Burden on and discounts/exemptions</b>	Respondents suggested that small/occasional landlords may face a greater burden than large	<i>This should only be necessary if a landlord has multiple properties</i>	Consultation survey comments,	This has been considered but is not practical in application. Ultimately all landlords have the same responsibilities

Theme	Issue	Example Comment	Comment Source	Council Response
for small and occasional landlords	portfolio operators and should be granted additional assistance/discounts	<i>Do we have any understanding of how many PRS properties in Havering are owned by larger concerns who may be able to more easily deal with additional regulatory burdens – will any assistance be available for smaller landlords?</i>	Public Forum Q&A	when letting a property be it for 6 months or 6 years, and irrespective of how many properties they own. It is crucial to maintain consistent standards across the whole sector.
		<i>I don't think you should be penalising single accidental landlords in this way.</i>		However, in common with all landlords, those landlords with fewer properties are able to take advantage of any number of the six discounts the council has proposed, and we would encourage all landlords to do so.

### 3.3 'Good' landlords and collaboration

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Negative impact on good landlords</b>	Concerns that licensing schemes drive good landlords out of the market due to increased costs and bureaucracy, leaving fewer rental properties available. Equally, respondents expressed that rogue landlords would evade the scheme with good landlords bearing the costs.	<i>Penalises good landlords and makes it difficult for landlords to continue to rent properties. This in turns forces landlords to sell and reduce the housing stock</i>	Consultation survey comments, Public Forum Q&A	<p>The council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the borough is experiencing large scale issues in the private rented sector with poor housing conditions and ASB.</p> <p>The Council's intention is to use the regulatory framework provided by additional and selective licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods.</p> <p>Non-compliant landlords will be subject to more scrutiny and put to greater cost than responsible, compliant landlords as they will be given a reduced-term licence. Furthermore, we will use robust enforcement against wilfully non complaint landlords to ensure PRS properties are protected by the licensing scheme.</p>
		<i>Bad landlords will not apply and thus the council will not implement any changes</i>		
		<i>Rogue landlords with poor properties will continue to operate outside the scheme, while good landlords will pay a fee and obtain a license with no benefits to them or their tenants.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
		<i>This does feel all landlords are being tarred with the same brush and having to pay a license fee even if they are decent landlord and run properties professionally.</i>		<p>We will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords, creating a level-playing field for responsible landlords.</p> <p>As is outlined within the consultation supporting documents, licensing schemes are expected to see benefits for good, compliant landlords as the neighbourhoods in which they have properties improve and they are offered support in managing their properties effectively, including the enforcement of tenancy conditions to combat neighbourhood nuisance caused by tenants or people visiting their properties.</p>
<b>Target rogue landlords</b>	Respondents suggested that the council should focus on targeting and penalising rogue landlords who are known to be providing substandard housing, rather than implementing a blanket scheme that affects all landlords.	<i>Enforce the rules already in place on landlords that do not do what they should and leave the good ones alone as much as possible, whatever government get involved with local or national they tend to make worse.</i>	Consultation survey comments, Safeagent letter	<p>If approved, the Council will carry out inspections to find unlicensed properties and will take action against those who refuse to licence their properties.</p> <p>An independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing)<sup>1</sup> found that licensing “provides a clearly defined offence (licensed / unlicensed) which simplifies enforcement -</p>
		<i>Fine the slum landlord and reward the proper landlords it's SIMPLE</i>  <i>But not enough money making for LBH</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
		<p><i>Licenses should be for poorly performing landlords only and not penalise the decent landlords. Focus on the landlords with compliments and spot check properties belonging to letting agents</i></p> <p><i>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.</i></p>		<p>and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences".</p> <p>Notably, in many cases, landlords may not be compliant as they are not aware of the legal requirements for or issues within their properties, and not because they are actively disregarding legislation. Licensing helps the council to work with all landlords to ensure a high standard of management and maintenance through education and collaboration.</p> <p>The council believes that licensing will enable them to work with landlords to raise standards of living in the borough and work to tackle the issues of poor housing conditions and ASB, by holding landlords to a high standard, and by carrying out inspections.</p> <p>Alongside the enforcement powers granted by licensing, the Council will also carry out a comms campaign to make landlords, tenants and residents aware of the licensing schemes, and raise awareness of how to report issues.</p> <p>1-<a href="#">Selective licensing review - GOV.UK</a></p>

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Work collaboratively with landlords</b>	Respondents suggest that the council should work collaboratively with landlords rather than treating them as adversaries, in order to improve housing standards and increase the supply of rental properties.	<p><i>1. Work closely with the good, reputable management agents</i></p> <p><i>2. Work closely with the good, reputable landlords</i></p> <p><i>3. Offer incentives/ discounts for those that comply and provide much needed good quality homes to our tenants and your residents</i></p> <p><i>4. Pursue and penalise poor performing agents and landlords</i></p> <p><i>5. Take feedback from tenants ( when do you actually consult them in all of this?)</i></p>	Consultation survey comments, Propertymark letter	<p>The Council is committed to providing robust support for landlords, and we have several measures already in place to ensure this.</p> <p>Our guidance for landlords, available on the Council's webpage, provides comprehensive information and advice to landlords to support them in meeting their obligations when letting a property.</p> <p>It is the Council's intention to use the regulatory framework provided by licensing to work with and educate landlords to bring about compliance, rather than take immediate enforcement action where non-compliance is found.</p>
		<i>The principle is wrong. Penalties are not the answer. The council should work together with private landlords in partnership to help ease the severe housing crisis</i>		



Theme	Issue	Example Comment	Comment Source	Council Response
		<i>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.</i>		<p>We particularly encourage landlords to become accredited to increase their professionalism in managing their properties. Through accreditation, landlords are able to achieve a level of knowledge and competence before letting a home, which is key to raising standards in the private rented sector. Accredited landlords will be eligible to receive a £100.00 discount on the licence fee.</p> <p>The Council will continue to provide landlords with detailed guidance on their legal obligations and responsibilities, both online and through landlord forums.</p>
<b>Work collaboratively with letting agents</b>	Respondents suggest that the council should work collaboratively with letting agents.	<i>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.</i>	Safeagent letter, Propertymark letter	The council agrees with the premise of working closely with accredited letting and management agents and is indeed open to exploring ways for effective collaboration.

Theme	Issue	Example Comment	Comment Source	Council Response
		<i>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.</i>		

### 3.4 Anti-Social Behaviour

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Landlords' responsibilities for dealing with ASB and other tenant behaviour issues</b>	Concerns were expressed about landlords' responsibilities regarding ASB and other tenant related behaviour. A feeling that this should be supported by the council and that tenants themselves have a responsibility to behave well.	<i>It's not the landlord's that cause the anti-social behaviour. They provide good quality newly fitted out house conversions but then accept unemployed tenants who have drink and/or drug problems. The government or council pay for their rent and council tax and the properties slowly but surely deteriorate because the tenants don't care or consider how much everything costs. The landlords understandably refuse to carry out repairs to damage and other problems and this has a knock on effect on the other tenants and neighbours and retail shops who suffer chronic theft levels.</i>	Consultation survey comments, Safeagent letter, NRLA letter	<p>The Council understands that it is the responsibility of all residents in the borough not to partake in anti-social behaviour.</p> <p>The Council does not expect landlords to be solely responsible for the behaviour of their tenants, but the Council would expect landlords to meet the proposed licence conditions, which lay out how to help address issues with ASB in licensed PRS properties.</p> <p>The Council will work with landlords who are experiencing issues with tenants to address issues of ASB, including guidance on how to manage ASB caused by tenants.</p>
		<i>Landlords do not have any control over how someone lives in their property. If the tenant puts the rubbish out at any time or does something to make the property look unsightly, or are antisocial, the Landlord cannot just evict them.</i>		<p>The Council would encourage landlords to include clauses in their tenancy agreements about ASB, and to manage their tenancies and ensure that ASB caused by their tenants is effectively addressed and if necessary appropriate action taken.</p>

		<p><i>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.</i></p> <p><i>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.</i></p>		<p>The licence conditions give actions which landlords should take to indicate that they are dealing with ASB associated with their properties. Evidence presented to the Council may be used in claims for possession. The Council's (ASB) officers will work in partnership to support landlords in dealing with tenants causing ASB.</p>
<b>ASB and overcrowding</b>	Difficulties for landlords to manage occupancy numbers.	<p><i>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?</i></p>	NRLA	<p>The council believes there are steps that landlords can take to determine if a property has been sublet or overfilled. Additional HMO licence condition 16.2 requires that '<i>inspections of the HMO are carried out at least every three months to identify any problems relating to the management, use and occupation of the HMO and its condition and contents</i>' and selective licence condition 12.5 requires that '<i>inspections of the house are carried out at</i></p>

				<p><i>least every six (6) months to identify any problems relating to the condition and management of the house.</i></p> <p>The NRLA's own guidance recommends that "inspections should be no less than every three months" <a href="#">The landlord's essential guide to periodic property inspections   NRLA</a></p> <p>The council does not believe that these inspections would impact the tenants' welfare.</p> <p>As stated above, the council will work in partnership to support landlords in dealing with tenants causing ASB.</p>
<b>Environmental crime</b>	Clarity over the extent to which the ASB and enviro-crime referred to in the Evidence Pack is attributable to the PRS	<p><i>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 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. 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,</i></p>	Property mark letter	<p>While it is not always possible to identify individual perpetrators of fly tipping, the licensing framework enables the Council to engage directly with landlords and managing agents to ensure that adequate waste storage facilities are provided, tenants are informed of their responsibilities, and waste management arrangements are clearly documented and monitored. This proactive approach contributes to a reduction in repeat waste-related incidents associated with licensed properties.</p> <p>We fully acknowledge that landlords cannot be held responsible for actions beyond their</p>

		<p><i>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.</i></p>		<p>control. However, through licensing, they are well positioned to set clear expectations, maintain appropriate property standards, and work collaboratively with tenants to prevent environmental issues. The Council's objective is not to assign blame, but to promote shared responsibility and improve the overall quality and cleanliness of neighbourhoods.</p>
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### 3.5 Administration of the proposed licensing schemes

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Council capability</b>	Concerns expressed in the Council's ability to manage the licensing schemes effectively, raising doubts about its implementation and impact.	<i>Unless the council is willing to physically inspect every property, this scheme does not and will not make any difference.</i>	Public forum Q&A, Consultation survey comments	<p>If the schemes are approved, the Council will enhance its enforcement capability proportionally to the number of licences anticipated. This forms part of the financial modelling of the schemes and includes implementing a recruitment and retention policy to manage the increased capacity needed for administration and enforcement of the schemes.</p> <p>Within the new scheme objectives, we have set ourselves challenging targets. Resources shall be prioritised to effectively deal with the properties of most concern and target enforcement actions to those landlords who fail to license their properties and/or breach licence conditions.</p> <p>The council will actively inspect for unlicensed properties and take action against those who refuse to license them.</p> <p>Proactive licence compliance inspections will also be conducted, and robust enforcement measures will be used against landlords who are wilfully non-compliant.</p>
		<i>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</i>		
		<i>The introduction of a borough-wide scheme will require significant administrative capacity to process applications, conduct inspections, and enforce conditions. Without a substantial increase in staffing and funding, there is a real risk that enforcement becomes inconsistent or superficial, undermining the purpose of the scheme.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Delivering effective enforcement</b>	Respondents emphasised the need for proper and efficient administration and, robust enforcement of the scheme	<i>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.</i>	Safeagent letter, Consultation survey comments	<p>The Council agrees that efficient enforcement and proactive inspections are fundamental to the success of any scheme. That is why the financial model underpinning the scheme builds in enforcement and inspection officers ensuring that visits to PRS properties are routinely conducted, and appropriate enforcement action is taken where necessary.</p> <p>While the Council remains committed to an educational and supportive approach - particularly for landlords who are willing to comply - we will not hesitate to take firm action where there is clear and wilful non-compliance. This dual approach ensures that risk within the PRS is managed effectively, and that tenants living in PRS properties are afforded the protections the licensing scheme is designed to deliver.</p>
		<i>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.</i>		
		<i>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.</i>		
<b>Use existing regulations and powers</b>	Respondents expressed they felt that the current regulations around the PRS and powers granted to the Council were sufficient to solve any issues and that any additional	<i>A more effective approach would be to enforce current legislation consistently and focus on targeted action against genuinely poor landlords, rather than imposing blanket conditions that penalise responsible landlords and</i>	NRLA letter, Consultation survey comments	The council have considered a range of alternatives to selective and additional licensing, but do not believe they are as effective in dealing with poor property conditions and ASB in the borough.



Theme	Issue	Example Comment	Comment Source	Council Response
	regulations add an unnecessary layer of bureaucracy.	<p><i>drive up costs for everyone — including tenants.</i></p> <p><i>The current laws if enforced should be sufficient to protect tenants</i></p> <p><i>The current framework—when properly enforced—is more than sufficient to ensure tenant safety, property standards, and responsible management. The issue is not a lack of regulation, but rather the enforcement of existing laws. Many problems in the private rental sector stem from a failure to target and hold non-compliant landlords accountable, not from an absence of rules.</i></p>		<p>The current powers the council has, including the use of the Part 1 Housing Act 2004, do not require landlords to declare themselves. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about.</p> <p>Formal action under the Housing Act can be a slow process, and improvements to properties can take many months. In most cases it requires the council to serve a notice and it is only if that notice is not complied with, that the council can then take enforcement action.</p>

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Renters Rights Bill</b>	The bill will provide much of what a PRSL scheme seeks to accomplish and that two parallel schemes are unnecessary.	<i>Furthermore, we think that both proposed schemes on a local authority level would be duplicitous with the provisions of a national landlord's registration scheme being proposed in the Renter's Rights Bill as outlined in the Kings Speech and is currently at the Report Stage in the House of Lords.</i>	PropertyMark letter, Consultation survey comments, Public Forum Q&A	<p>The council has carefully considered the proposals in the Renters Rights Bill. While the proposal includes valuable tools for local authorities, like the property portal, it is not a substitute for an additional HMO or selective licensing scheme.</p> <p>Additional HMO and selective licensing provide a locally tailored, systematic approach to improving housing standards. They are more than just a collection of information; they are a proactive means for local authorities to inspect privately rented housing without the need for tenant complaints. This facilitates targeted action where it is needed most, ensures property managers are fit and proper persons, and protects vulnerable tenants.</p> <p>The property portal will aid in the identification of unlicensed properties and</p>
		<i>I believe that the renters reform bill is and will raise tenant understanding of their rights.</i>		
		<i>This upcoming legislation will directly address many of the concerns selective licensing seeks to remedy — but in a more targeted and proportionate manner. Introducing a licensing scheme now, in advance of this major national reform, is premature and risks creating overlapping and confusing regulatory burdens.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
				<p>inform landlords about local activities. However, it will not directly improve property conditions and management. Certificates will still need to be checked for accuracy, and landlords can opt out of receiving notifications from the portal, limiting its impact.</p> <p>Recent government guidance<sup>2</sup> on the Bill states:</p> <p><i>Selective licensing remains a valuable tool when used appropriately and combined with other measures. It enables local authorities to target the improvement of standards and</i></p>

<sup>2</sup> <https://www.gov.uk/government/publications/guide-to-the-renters-rights-bill>

Theme	Issue	Example Comment	Comment Source	Council Response
				<p><i>safety in areas suffering from issues such as poor housing quality, high levels of deprivation and anti-social behaviour. It has the ability to drive better outcomes for local residents, tenants and responsible landlords. Our plans to deliver a Database will provide access to information about privately rented properties and tackle one of the biggest and most time-consuming barriers faced by local councils when enforcing standards – identifying poor quality and non-compliant properties and who owns them.</i></p> <p><i>We will work with local councils to gather more information about their selective licensing schemes to ensure the schemes are continuing to deliver the intended outcomes.</i></p> <p>In conclusion, while the portal and other parts of the Renters Rights Bill will provide a valuable source of information on the sector, additional HMO and selective licensing schemes are still necessary. They ensure effective regulation and improvement of the private rented sector, providing a comprehensive solution that addresses the unique challenges of each local authority area. The Council supports the implementation of both tools in tandem to achieve the best outcomes for landlords, tenants, and local communities.</p>

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Public Register</b>	Respondents emphasise the need for a publicly accessible register of landlords and PRS properties and a review system where tenants provide feedback on their rental experiences.	<i>Centrally store an online list of all HMO landlords that is open to the public.</i>	Consultation survey comments	It is a legal requirement for the Council to maintain a public register of all licensed properties in the borough. You can currently search for licensed HMO properties at <a href="#">Landlord licence public register   Havering Council</a>
		<i>The new Renters Rights Bill will require a landlords register. What does your proposed selective licensing add to this register?</i>		Information about private landlords and letting agents who have been prosecuted or fined can be found by searching the <a href="#">Mayor of London's Rogue Landlord and Agent Checker</a> . This contains information about landlords and agents who have been: <ul style="list-style-type: none"> <li>• prosecuted or fined by London boroughs for housing-related offences</li> <li>• prosecuted by the London Fire Brigade for fire safety offences</li> <li>• expelled by one of the agency redress schemes</li> </ul>
		<i>Nothing is monitored by the council, in fact they don't visit the majority of licenced properties.</i>  <i>It is a ridiculous idea just to make money, you could just as easily have a register the like of which will come in with the renters reform bill in October and the licence will not be needed.</i>		
<b>Complaint reporting methods</b>	Suggestions for measures to protect tenants such as providing a way for tenants to report issues.	<i>Create a direct line service where tenants can report the rogue landlord to the Council</i>	Consultation survey comments	There are a number of ways for tenants, to get in touch with the team to report properties they are concerned about, or

Theme	Issue	Example Comment	Comment Source	Council Response
		<p><i>Create a database of the landlords in the area instead of charging us for licenses and allow the tenants to report serious problems.</i></p> <p><i>You could create a direct service where a tenant reports a rogue landlord.</i></p>		<p>specific issues with a property. This includes a dedicated email to report issues, a licensing telephone line to speak to officers and an online reporting form on the Council's website. <a href="#">Private tenants services and information - Havering Council</a></p> <p>The council is committed to addressing complaints and will maintain this commitment within the framework of the licensing schemes. However the current process of reacting to complaints relies on complaints being made to the council and does not encourage landlords to be proactive.</p> <p>The council believes that a proactive approach will have a greater impact on improving property conditions and will increase the awareness of tenants of acceptable standards in privately rented properties.</p>
<b>Transparency and accountability in licensing outcomes</b>	If the scheme is approved an annual review should be undertaken and made publicly available.	<i>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</i>	PropertyMark, NRLA, Consultation survey comments	We agree that transparency and accountability are essential to building trust and demonstrating the value of the scheme to all stakeholders, including landlords, letting agents, tenants, and the wider community. The Council is committed to monitoring the impact of the scheme and

Theme	Issue	Example Comment	Comment Source	Council Response
		lifetime. This would improve transparency overall.		recognises the importance of sharing this information in a clear and accessible way.
		However, there is a significant lack of transparency regarding how the monies collected from landlords have been spent and how effective this expenditure has been in achieving the stated aims of the scheme.		In accordance with the Housing Act 2004, we will review the operation of any designation made from time to time. In line with best practice guidance set out in the Selective Licensing General Approval, we will publish the outcome of any reviews undertaken on our website.
		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' behaviour and the impact of licensing on the designated area throughout the scheme's duration. This would enhance overall transparency.		

### 3.6 General comments about the licensing scheme proposals

Theme	Issue	Example Comment	Comment Source	Council Response
Uneven application across borough	Suggestions that licensing should only target problem areas or properties and should not be applied broadly across the whole borough.	<i>Again this MUST cover all of Havering.</i>	Consultation survey comments, Public Forum Q&A	<p>The council can only introduce selective licensing in areas in the borough where there is evidence that the area meets the criteria as laid out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015.</p> <p>The council carried out a detail analysis of the PRS and guided by the evidence, the council has been selective in proposing which wards would be covered by the scheme. The evidence supported a selective licensing scheme based on poor property conditions in seven out of 20 wards.</p> <p>The Council will continue to monitor those wards not included in the selective licensing scheme and should the evidence change then consideration will be given to introducing a third designation.</p>
		<i>I would look to raise a formal objection if this doesn't cover the entire borough</i>		
		<i>I agree with the scheme but in my opinion it should apply to all areas. While concentrating on these seven areas, the others will continue to go downhill.</i>		
		<i>I think it should be rolled out across the whole borough so that expectations are made clear to all and that the issues are not just moved to another area and eventually the whole of Havering becomes a neglected and deprived looking area. It is already creeping in across the borough and it needs to be stopped. It is much easier to act now than trying in hindsight to remediate because the damage has already been done. It takes far too long to bring an area back up. It took the Olympics to change Stratford, we don't have that.</i>		



Theme	Issue	Example Comment	Comment Source	Council Response
		<i>The selective licensing scheme should be enforced across ALL landlords in Havering and those that demonstrate good management/maintenance over a set period of time will earn exemption from the licensing fee. Would that not be a fairer approach?</i>		
<b>Evidence base flawed</b>	Respondent raises concerns about the Metastreet predictive modelling methodology.	<i>I'm really struggling to agree that sufficient numbers and data are in the evidence pack to support a licensing scheme as the right approach compared to other options. How do we request further empirical data is obtained to support this proposal, including comparing to other sectors, other alternatives, other regions etc... Furthermore, how success will be measured?</i>	Consultation survey comments, Public Forum Q&A	<p>The Metastreet's Tenure Intelligence (Ti) methodology is clearly outlined at page 58 of the Housing Stock Condition and Stressors report (Consultation Evidence Pack Appendix 1).</p> <p>Ti uses a wide range of data and machine learning in combination with expert housing knowledge to accurately predict a defined outcome at the property level.</p> <p>Council and external data have been assembled as set out in Metastreet's data specification to create a property data warehouse. This includes various data sources and is not based solely on where 'action' has been taken by the council. All results have been carefully analysed by skilled practitioners</p>
		<i>The proposal targets seven wards based on "poor housing conditions," but the consultation documents do not provide robust, ward-specific evidence to justify this under the Housing Act 2004.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
				<p>Predictive modelling has been used in this field for almost 20 years specifically for the purpose of understanding housing stock condition as required by Housing Act 2004 Part 1, section 3. Many councils have progressed to using modelling to understand whether areas would benefit from property licensing, support the introduction of property licensing and increase property licensing compliance.</p> <p>The Council has contributed information to and thoroughly examined the predictive data produced and is confident in the reliability and robustness of the information.</p>
<b>Issues in Council and housing association properties</b>	Respondents expressed that they believed the primary issues within rented properties were primarily related to properties owned/managed by Councils and housing associations.	<i>You should look at the state of your own social housing first, but hey, that doesn't matter to you.</i>	Consultation survey comments, Public Forum Q&A, Propertymark letter	<p>The licensing proposals are set in the context of the council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB.</p> <p>Licensing is part of the council's wider strategy to improve the lives of residents in the borough.</p> <p>Like many areas, Havering is under increasing pressure to find suitable temporary accommodation for families. The</p>
		<p><i>Anti-social behaviour is caused by council tenants and emergency accommodation tenants placed in social housing. However, the council use private landlords as the scapegoat for their own failings and as a revenue generator to keep public sector workers in employment.</i></p> <p><i>Tackle social housing and council housing first before trying to go after private landlords.</i></p>		

Theme	Issue	Example Comment	Comment Source	Council Response
		<p><i>The licensing scheme is ineffective at improving standards.</i></p> <p><i>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.</i></p> <p><i>Private landlords are not the issue. Council houses are not up to scratch - poor hygiene, safety etc. However, the same rules don't apply to the council as landlords. The council don't have to comply with any regulations, whereas landlords are having to comply more and more. 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).</i></p> <p><i>Also residents are also responsible for cleaning their council houses/private rentals, as well as opening windows to reduce mould etc. They should be fined if they don't. Problem will just get worse for Havering residents if you keep attacking landlords. A lot more homelessness as a result.</i></p>		<p><i>Havering Prevention of Homelessness and Rough Sleeping Strategy 2020-25</i> comprehensively sets out Havering's approach, based around four objectives:</p> <p><b>Objective 1:</b> End long-term rough sleeping</p> <p><b>Objective 2:</b> Reducing the number of people in temporary accommodation</p> <p><b>Objective 3:</b> Supporting people who become homeless</p> <p><b>Objective 4:</b> Provide good value, integrated services that deliver excellent customer care.</p> <p>Whilst the council acknowledges that all property types may have issues with poor property conditions, licensing is a tool available for the council to use to address these issues solely in the PRS.</p> <p>Properties let by a local authority or a Registered Provider (housing association) are exempt from licensing by law and thus any issues with these types of properties must be dealt with separately.</p>

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Short-term lets</b>	Respondents expressed desire for the inclusion of short-term lets/Airbnb properties within the scheme	<i>Air b and b. Property owners must get permission from the council if they rent over a set number of days per year. Inline with London rules if they do not get permission and rent over the set number of days they should be fined. There is no deterrent at present and air b and b properties can rent illegally as the council procedure to deal with them is too slow.</i>	Consultation survey comments	<p>Properties let through Airbnb are short-term lets and do not legally fall within the licensing schemes which apply to longer term rentals. However, Airbnb properties may require planning permission for change of use if the property is rented out frequently. Generally require planning permission if let for over 90 nights per year <a href="#">Guidance on short term and holiday lets in London   London City Hall</a></p> <p>The Council will continue to monitor short-term lets and respond to issues caused by Airbnbs, such as noise complaints using appropriate legislation.</p>
		<i>SHOULD APPLY TO AIR B &amp; B LETS AND HOLIDAY LETS</i>		
		<i>SHORT TERM LETS</i>		
		<i>Air B&amp;B some are used as rentals for long periods. Should be 100 % regulated in line with rentals and HMO's</i>		
<b>Council tax as an alternative to licensing</b>	Respondents suggested the use of council tax records as an alternative to licensing	<i>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</i>	NRLA	The council has considered a range of alternatives to selective and additional HMO licensing, but do not believe they are as effective in dealing with poor housing conditions or ASB in the borough (Please see Section 13 of the Consultation Evidence Pack).

Theme	Issue	Example Comment	Comment Source	Council Response
		<i>unnoticed. By adopting this method, the council would not need to immediately consult and implement changes.</i>		
<b>Overall opposition to HMOs in the borough</b>	Respondents expressed general dissatisfaction with the state of HMOs and perceived growth in the HMO tenure within the borough	<i>Cut down on the number HMO'S . We have enough problems in Romford as it is. Just go to Romford station bus stops about 6.00pm and see what we have to put up with. It's disgraceful.</i>	Consultation survey comments	<p>HMO planning and HMO licensing are separate regimes, and their legislative requirements are quite different. Small HMOs (between 3 and 6 unrelated occupiers) have permitted development rights. The Council has no legal grounds to take action or stop the development where change of use is 'permitted'.</p> <p>Property licensing schemes do not result in increased numbers of HMOs, but they do seek to improve the management and standards of the HMO properties already in existence. The Council believes, therefore, that those areas with large numbers of HMOs will continue to see the benefits of additional HMO licensing that a further scheme would bring.</p> <p>The licensing scheme will enable issues of overcrowding within HMOs to be addressed. There are specific licence conditions relating to the maximum occupancy of both the property and the rooms within it. Licence-holders are required to inspect their properties every three months. This must include evidence of</p>
		<i>Flooding the London Borough of Havering with HMO will see a decline in the area, encouraging the wrong type of people into the borough, this will effect the cleanliness of the borough, and also increase burglaries, as you will be moving anyone in the area. Which is mainly middle class hard working people.</i>		
		<i>Just totally ban ALL HMO properties. Living near one I can say, they are not looked after, the landlords couldn't care less who lives in them, the people cause all sorts of disturbances, there is a constant stink of cannabis, there is rubbish strewn all over the place outside, lost count of the number of police attendances. they drag the standard and quality of life of all others down, this borough is looking more and more like some inner city cess pit of a dump.</i>		

Theme	Issue	Example Comment	Comment Source	Council Response
				checks that the HMO is being occupied by the level of occupancy specified in the licence.
<b>Support for landlords dealing with tenant-related issues</b>	Respondents emphasised a need for guidelines and support for landlords on how to handle tenant-related problem	<i>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.</i>	Propertymark letter	The Council will work in partnership to support landlords in dealing with tenants causing overcrowding or persistent ASB. Licensing Officers will work closely with the Homelessness Prevention team to support landlords and tenants to sustain tenancies. However, where the sustainment of tenancies is not possible landlords are advised to seek legal advice before taking steps to seek possession of their property.

Theme	Issue	Example Comment	Comment Source	Council Response
<b>Overall opposition to schemes</b>	Respondents expressed an overall disagreement the introduction of the proposed schemes	<i>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.</i>	NRLA, Consultation survey comments	<p>Whilst the Council understands that some stakeholders may disagree with the proposal to introduce selective and additional HMO licensing, the Council has provided evidence of the need for selective and additional HMO licensing to tackle persistent issues with poor housing conditions and ASB.</p> <p>The Council can only introduce selective and/or additional licensing in areas in the borough where there is evidence that the areas meet the criteria as specified by the Housing Act 2004. The council carried out a detail analysis of the evidence available and has been selective in proposing designations for areas that meet the criteria of poor housing conditions and ASB.</p>
		<i>I respectfully disagree with the proposals—not because I oppose proper oversight or high standards in the private rental sector, but because I believe the current approach misplaces responsibility. The vast majority of landlords are already responsibly managing their properties, ensuring safe, compliant, and well-maintained homes for their tenants.</i>		
		<i>In the strongest possible terms, I oppose both the introduction of this licensing scheme and the extortionate fees proposed.</i>		