

Table 1: Consultation responses from Landlords, Management Companies and Landlords Associations

After each comment a numbered Council response is given

Comments & Council Response	
Theme: Economic Considerations and Costs	
<i>Landlords' comments</i>	<ol style="list-style-type: none"> 1. <i>"The fees the Council charge are ludicrously high". How do you justify it?</i> 2. <i>"Why is there the same charge for one bedroom bedsits within a house as there is for a 5 bedroom family house?"</i> 3. <i>"The fees do not reflect the work the Council does".</i> 4. <i>"We have just paid £500 for a licence and it seems unfair to have to pay another £589 next year".</i> 5. <i>"There should be discounts for early payers or long term licensees".</i> 6. <i>"If the property changes hands does the old landlord get a refund?"</i> 7. <i>"When I paid my licence fee I wanted to see benefits including some advice on how the various regulations specifically applied to my property and it just seems like a money making scheme".</i> 8. <i>"Some landlords who signed up to the scheme in 2013 have not yet had a visit to inspect their property which makes it feel like a money making scheme".</i> 9. <i>"The new fixed penalties will be a great source of income. Will they be used to target accidental non-compliance or for the real rogue landlords?"</i> 10. <i>"The scheme needs to be low cost and efficient otherwise it can unnecessarily increase rents and drive landlords away from the much needed HMO market."</i> 11. <i>"For those already licenced a fee not exceeding £50 should be charged to update the licence"</i> 12. <i>"It looks like the Council would like to fund one or two officers to monitor the rental market and divide</i>

	<p><i>the cost of this across a number of landlords who register their HMOs.”</i></p> <p>13. <i>“The Cost should be split into a registration fee for 1 year at £100 and then £75 per year thereafter to overcome the problem of licences not being transferrable if the HMO only runs for part of the 5 year period or it is registered at the end of the 5 year period.”</i></p> <p>14. <i>“It is hard to justify £800 to externally accredit checks which could be done by the tenants, for example, documents in place for electrical safety, gas safety, EPC, PAT testing heat sensors CO detectors and smoke alarms.”</i></p> <p>15. <i>“The Licence fees should be limited to the costs of administering the licence but not the cost of enforcement and the fees must be reasonable and proportionate”. The cost of over £800 for a low risk dwelling would appear to be covering enforcement costs, not proportionate to the work involved. The work on registering the lower risk properties should therefore be outsourced to deliver results at a fraction of the cost”.</i></p> <p>16. <i>For landlords that are transitioned from an Additional to a Mandatory licence and no changes have been made to the property the fee should be a flat rate of £300. New HMOs coming into the market should pay the full fee for their first licence. Future licences for the same owner and property should also then be discounted.</i></p> <p>17. <i>“Landlords are hard pressed to charge reasonable rents due to all of the additional expenditure being enforced”. Good landlords should be rewarded by reducing council tax for the period the property remains empty between tenants and removing charges for landlords who have to dispose of rubbish left by tenants.</i></p>
<p>Councils Response</p>	<p>1. The cost of the licence has been calculated to take into account the amount of time it takes to administer the scheme which includes staff time, overheads and equipment as well as monitoring. The costs of the licences have also remained static for the past 5 years and haven’t risen with inflation. We are also proposing not to charge for services which we could charge, for example, we will continue to provide free advice for consultations on new HMO developments and will not charge for material changes to the licence. A survey of Councils</p>

across the region has shown that the cost of the Additional HMO licence is not unreasonable in that it is similar to many neighbouring councils.

2. The charge is levied on the property as a whole and for each unit of accommodation so that the cost will not necessarily be the same, the larger and higher risk the property the greater the cost. For a 5 bedroom property the total cost would be an extra £0.68 per week per tenant for the 5 year period.
3. See response 1 above.
4. The Council understand that this could be perceived as being unfair, especially for new HMO landlords and will consider whether to revise its charging policy as a result of the consultation.
5. The Council have to recover their costs for administering the scheme and therefore discounts have not been made for early payers or long term licensees. This is because the licensing approval process takes the same amount of time regardless of whether landlords pay early or have been licenced for a long period of time.
6. When a property changes hands, the legislation specifies that the licence is not transferrable so that a new licence has to be applied for. The cost of the licence cannot be calculated on a pro rata basis as it has to last for a set period of 5 years, from the date the scheme came into effect to the day it ends. The framework of the legislation therefore prevents Councils from being able to make refunds.
7. If landlords wish to receive tailored advice for their property they can request an inspection and the Council will be pleased to assist. Inspections are based on risk which means that the lower risk properties will not be automatically be inspected at the time of their license application unless the risk increases, standards deteriorate or we receive intelligence from complaints.

8. See response to 7 above.

9. The fixed penalties have been introduced nationally and will be applied in a proportionate and considered way. They will not be applied to landlords who show willingness to comply with the legislation, although ignorance of the law is no defence. We will consider each case on its merits and take into account the landlords history of non-compliance as well as the severity of the offence before issuing a penalty. It is anticipated that they would be applied in the small minority of cases where tougher enforcement action is needed to require compliance. We also have very many good landlords in Bedford who have improved their properties over the five years of the scheme and should like to thank them for their hard work in helping to raise standards locally.

10. The Council understand your concerns and accept that this could happen. However much of the research to date, indicates that the HMO housing market is likely to increase in the future and that the main driver for rent increases is the market (and a shortage in housing supply), rather than the introduction of HMO licensing schemes.

11. The Council understand your point but unfortunately a renewal fee of £50 would not cover the administration costs for processing the licence.

12. The Council will fund the scheme through existing budgets and have no plans to employ more staff as a result of extending the Additional HMO licensing scheme.

13. Unfortunately the framework of the legislation does not permit for the licence to last for less than 5 years from when the scheme came into operation which is why all licences have to be backdated to the date the designation came into effect. The administration costs for charging £75 each year for each landlord would also increase requiring extra time to invoice and chase payments rather than a one off fee which is cheaper to administer.

14. The framework of the legislation is designed to protect tenants rather than giving them the

	<p>power to deal with landlords who are not complying with the legislation. This is to avoid practices like, for example, retaliatory evictions.</p> <p>15. See response to 1 above. The Council do not intend to outsource the administration of the scheme.</p> <p>16. The Council think that this would be unfair to new landlords entering the market place which could restrict growth in this sector of the market.</p> <p>17. The Council understand your concerns but are unable to reduce the cost of the council tax whilst the property is vacant and ‘in-between tenants’. The Council have also considered your comments relating to reducing waste disposal costs for landlords and although we cannot reduce these, we welcome opportunities to work with landlords and tenants to ensure that waste is properly disposed of.</p>
Theme: Making the case	
<i>Landlords' Comments</i>	<p><i>18. The Council should not renew the scheme after 5 years.</i></p> <p><i>19. "Licensing is not the solution as it imposes a tax on good landlords and adds to the administration at the Council. Using current powers is the solution."</i></p> <p><i>20. Licensing is unnecessary, if tenants do not like their housing conditions they should move and then landlords would improve their properties.</i></p> <p><i>21. "I don't think that licensing does anything except create bureaucracy"</i></p> <p><i>22. "Tenants appear to have more rights than landlords but it is nearly always landlords who are portrayed as baddies"</i></p> <p><i>23. I do not see the need for licensing as there are already other schemes to deal with the problems licensing is trying to cover for e.g. police deal with nuisance etc. and letting agents check documents."</i></p> <p><i>24. "The HMO licensing scheme should apply to the public rented sector as well as the private rented sector."</i></p>

<p>Councillors Comments</p> <p>Residents Association Comments</p>	<p>25. <i>"Why are the tenants not licenced?"</i></p> <p>26. <i>"An assessment should be done to determine the value of the scheme for tenants."</i></p> <p>27. <i>Authorities should spend their money on dealing with concerns relating to owner occupier neighbours which is more important to tenants.</i></p> <p>28. <i>"The Consultation is a complete waste of time as the Council will implement changes and charges at their will as they always do."</i></p> <p>29. <i>"The Council should revert back to pre-2013 requirements."</i></p> <p>30. <i>"Landlords are not aware of their obligations and unwittingly fall foul of licensing. There should be a dedicated helpline. "</i></p> <p>31. <i>"The Council has not tackled the worst properties/areas first....It has gone for the soft option of upgrading blocks which are relatively well run and not done enough to tackle those blocks that are poorly managed."</i></p> <p>32. <i>It would be best for all involved for option 1 (Statutory Action Only) to be adopted. If the Council goes ahead with option 2 (Renewal of the Additional Licensing Scheme across the Borough) the following changes should be made:</i></p> <ul style="list-style-type: none"> <i>a. A licence for an HMO is only required if there are 3 or more sharers living with the landlord.</i> <i>b. Reduce the licensing requirements to only relate to fire safety</i> <i>c. Bring back the renovation grant</i> <p><i>Option 2 would also make more people homeless and reduce the sense of community with more tents appearing in parks and woods because tenants are being forced to seek lower cost accommodation which landlords cannot afford to provide in the long term.</i></p> <p>33. <i>I Request that the Council introduces Option 3 (Selective Licensing) and or Option 4(Urban Ward limited Selective Licensing) within the Midland Road area. This is because matters relating to poor housing conditions affect all types of private rented accommodation not just HMO's. I am also concerned that there are too many HMOs located in the Midland Road area and intend to press for an Article Four Direction.</i></p> <p>34. <i>We would like to request that Bedford Borough Council approach the DCLG to apply both Selective Licensing and an Article 4 Direction to the Midland Road area of town whilst still continuing with the Additional Licensing to cover all other areas. This is because of low housing demand, persistent</i></p>
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	<p><i>problems with ASB including fly tipping, street drinking, drug dealing and prostitution. There are also high levels of migration in the area, poor property conditions and high levels of deprivation and crime. The area has the highest proportion of private rented sector accommodation in Bedford. We also urge the Council to issue an Article Four Direction.</i></p> <p><i>The data presented supports a clear argument for Option 3 in Castle Ward (Midland Rd area) and possibly in future parts of Cauldwell, Harpur and Queens Park wards.</i></p>
<p>Councils Response</p>	<p>18. The Council have identified that there are still a proportion of HMOs in the Borough that are managed ineffectively. This includes evidence from complaints about rubbish, noise and antisocial behaviour associated with HMO properties. There are still a number of HMOs that have also not been licenced as landlords have tried to evade the legislation and others that still lack basic fire safety standards. With a predicted increase in the number of HMOs in Bedford there is also a need to ensure that new properties comply with the required standards.</p> <p>19. Using current powers assumes that HMOs across Bedford Borough will receive only the minimum attention other than the action the Council is required to take to deal with poor conditions i.e. Mandatory licensing and the investigation of complaints. This could lead to further prosecutions and it is likely that it will do little to address the long term strategic approach to the HMO sector locally and may lead to a spiral of decline and a growing need for intervention in future years.</p> <p>20. Unfortunately there is a short supply of affordable housing which means that it isn't easy for tenants to move to better alternative accommodation. There is therefore little incentive for the non-compliant Landlords to improve the basic standards at their properties and they can still charge high rents for poor quality accommodation.</p> <p>21. There are many examples of how HMO licensing can improve housing conditions for the poorest in society from local authorities across the Country. In Bedford since licensing has been introduced, broad compliance for management and fire safety has increased from 62% to</p>

85%. The Council are working to keep the level of bureaucracy to a minimum through on line application forms and simplifying the fee structure.

22. The Council do not wish to portray landlords as being bad. There are many good local landlords in Bedford who the Council have worked closely with over the years to provide good quality housing for tenants. There will however always be a proportion of the sector which is poorly managed and needs to be tackled through pro-active licensing schemes.

23. Licensing is important because it deals with management issues in a pro-active way requiring landlords to take steps to prevent nuisance and ASB in the first place thereby removing the need for involvement by other agencies.

24. The Council understand your views; however the legislation does not permit the public sector to be regulated through licensing as there are separate controls for this sector. The Council may however take action in public sector properties where there category 1 or 2 hazards which exist.

25. The framework of the legislation does not permit tenants to be licenced by the Council. There are however a number of pieces of legislation which are designed to support landlords in their duties and to control tenant behaviour, for example, the Management of Houses in Multiple Occupation (England) Regulations 2006 & 2007.

26. An assessment of the scheme for tenants has been conducted as part of the public consultation and will be reported to Committee on the 13th February 2018.

27. The Council can deal with certain types of complaints about owner occupied properties and if there is a particular problem or concern you can report it using the main contact number 01234 267422 or email: ehadmin@bedford.gov.uk

28. The Council is committed to listening to landlords views and in formally responding to their

comments.

29. The reasons why the Council is choosing not to revert back to pre-2013 requirements are that it will do little to address the long term strategic approach to the HMO sector locally which may lead to a spiral of decline and a growing need for intervention in future years. It also wouldn't address the new national legislation coming into effect next year which extends mandatory licensing to smaller HMO properties.
30. The Council have a dedicated helpline to deal with HMO licensing enquiries which is 01234 718516. However the Council prefer to receive landlords requests for information through the dedicated HMO licensing email address which is HMOlicensing@bedford.gov.uk. The Council also have a dedicated web site with up to date information for landlords which is www.bedford.gov.uk/HMO. The Council also organise a bi annual Landlords forum where updates are given to landlords on current topics of interest including requirements for HMO licensing.
31. The Council have targeted their approach based on risk so that the highest risk properties are dealt with first. It has also tackled many poorly managed HMOs through the service of 560 notices to improve housing conditions, 6 prosecutions totalling £28,097 and 34 formal Police and Criminal Evidence Act interviews.
32. Under the current proposals a live in landlord can have up to two lodgers residing at their property without having to apply for an Additional HMO licence. Reducing the licensing requirements so that they just relate to fire safety would not help address the problems widely associated with anti-social behaviour and overcrowding. The Council do not have the resources to bring back the renovation grant and the responsibility for keeping properties in a good state of repair is with the Landlord / owner of the property. The Council accept that an increase in homelessness might be a consequence of HMO licensing but there are many other factors which have been shown to influence homelessness. HMO licensing has not been demonstrated to increase rents which are mainly driven by market forces including higher property prices.

	<p>33. The Council accept that poor housing conditions relate to all private rented accommodation and are not just limited to HMOs. The Council do not intend to adopt a Selective Licensing Scheme in the Midland Road area of Bedford because private rented family homes often have fewer problems associated with them and are considered less of a risk in terms of structure, management and fire safety. Selective Licensing applied to a small urban area also establishes different standards across the Borough and therefore does not support a growing housing market in the Borough as a whole. Currently there is also a lack of evidence linking private rented family homes to ASB and poor management.</p> <p>34. The determination of Article 4 is a matter for the Planning Department and is separate to this consultation.</p> <p>34. & 35. See response 33 above.</p>
<p>Theme : Legal Issues & Enforcement</p>	
<p><i>Landlords' comments</i></p>	<p><i>36. When a tenant sub-lets a property and creates an HMO, will the Council issue a fixed penalty to a landlord even when landlords have to give notice of any visits as tenants are entitled to 'quiet enjoyment' in their tenancies?"</i></p> <p><i>37. "The Council should avoid imposing draconian measures on smaller properties where the situation is very different to large blocks like Grenfell Tower".</i></p> <p><i>38. "The biggest problem in the UK is lack of enforcement by the Police and Councils".</i></p> <p><i>39. "We have received absolutely zero benefit back and want to know what has happened to our money? The responsible landlords are subsidising the rogue landlords who do not pay to licence their properties which is unacceptable and an unfair tax".</i></p> <p><i>40. "You are expecting landlords to police the behaviour of their tenants and the primary purpose of a licence is to ensure that the property is structurally safe and in good condition. Tenants must accept responsibility too."</i></p>

	41. <i>“Will my s.257 HMO still be exempt under the new scheme?”</i>
Councils Response.	<p>36. This will depend upon the circumstances of the case and whether the landlord had taken all reasonable steps to ensure that their property was being managed effectively. Ignorance of the fact is no defence in law. Managing the property effectively includes making sure that the tenants do not illegally sublet. Tenants are also required to allow the manager access the property at reasonable times to undertake their management duties under the Management of Houses in Multiple Occupation (England) Regulations 2006 & 2007.</p> <p>37. The Councils standards are tailored to the risk and size of the property and agreed with the Fire Service so that they are implemented in a proportionate and consistent way.</p> <p>38. The Council takes enforcement action very seriously with landlords who wilfully fail to comply with the law relating to private rented property and HMOs. Throughout the period of the licensing scheme it has undertaken 6 successful prosecutions amounting to £28,097 in court fines including against landlords who refused to licence their properties. It has also served a total of 560 notices to improve housing conditions which includes 54 prohibition notices, emergency prohibition and emergency remedial action notices and conducted 34 formal tape recorded interviews under the Police and Criminal Evidence Act (PACE).</p> <p>39. See response to 3 above.</p> <p>40. HMO licensing includes structural safety as well as the management of the property which includes controlling tenants to reduce ASB and provide adequate provision of waste receptacles. Tenants are also required to allow the manager access the property at reasonable times to undertake their management duties and to dispose of their litter and refuse in accordance with the managers instructions outlined in the Management of Houses in Multiple Occupation (England) Regulations 2006 & 2007.</p>

	<p>41. Your s.257 will continue to be exempt under the renewed scheme so long as it still meets the 1/3rd rule in that no more than a third of the flats are let out on short term tenancies and the conversion complies with the 1991 Building Regulations.</p>
<p>Theme: Other General Comments</p>	
<p><i>Landlords' Comments</i></p>	<p><i>42. "Rubbish problems have been caused by the Councils reduction in bin collections so do not blame landlords."</i></p> <p><i>43. "ASB is not helped when the Council advises a tenant who isn't paying rent to ignore court orders and stay until the bailiffs arrive"</i></p> <p><i>44. "It is difficult seeing the benefit of fitting fire doors when the walls and ceilings are likely not to be an effective fire barrier especially in Victorian houses with lathe and plaster"</i></p> <p><i>45. I am concerned that there are blocks of converted Victorian flats that do not meet basic fire safety standards, but are not classified as a s 257 HMO.</i></p> <p><i>46. "I fail to see how three unrelated adults sharing a property would create more of a fire safety risk than a nuclear family made up of two adults and a child"</i></p>
<p>Councils Response</p>	<p>42. With the changes to the waste collection service, there is an even greater need for landlords to raise awareness with their tenants about how to use their bins correctly under the new scheme. This includes preventing the contamination of recycling bins, as well as providing enough receptacles for the waste. The Council do not intend to blame landlords, but wish to encourage them to manage their tenants to deal with their waste correctly.</p> <p>43. The Council understand your concerns; however ASB is caused by private sector tenants as well as those in the public sector and needs to be carefully managed by all landlords to help</p>

reduce overall levels. The Council recognise the concerns landlords have about the eviction process. As this is national legislation the proposed scheme cannot influence this. However we will work with landlords to ensure they understand the tenancy provisions and the eviction process and apply them correctly. The Council will where necessary and in the public interest, take action against tenants that can be shown to be in breach of their responsibilities under the applicable Management Regulations.

44. It is important in terms of fire safety especially in older Victorian flat conversions that the fire separation is adequate for floors, walls and ceilings. Old lath and plaster is acceptable as long as it isn't damaged in any way and so are timber stud partition walls with a layer of plaster board and plaster skim either side. This coupled with adequate fire detection meets the locally agreed fire safety standards with the Fire Service.
45. Although these blocks of flats do not require HMO licensing, the fire service and the Council have powers to require the owners to upgrade them for fire safety. If you have any particular concerns e.g. poor fire safety and no fire detection then please report them to us so that we can investigate and take action to improve them.
46. The legislation was designed to protect unrelated people living together rather than families because of the way they inhabit and behave in the property. Families tend to cook, eat and sleep together so are aware of each other's activities and movement and in the event of a fire are more likely to support one another. Individuals living separate lifestyles are unaware of each other's activities and behaviours so are classified as higher risk in terms of fire safety.

Table 2: Consultation responses from Tenants and Residents

After each comment a numbered Council response is given

Theme: Concerns about private rented properties including HMOs	
<p><i>Tenants / Residents / comments</i></p>	<p>47. <i>Problems with littering and throwing waste in private gardens as well as overflowing bins</i></p> <p>48. <i>Drug dealing in flats and use of alcohol and drugs in the front garden.</i></p> <p>49. <i>The state of repair of the houses is not good</i></p> <p>50. <i>“The Landlord bodes repairs”</i></p> <p>51. <i>Entrance doors are often in a bad state of decoration or repair.</i></p> <p>52. <i>Dog barking and dog mess.</i></p> <p>53. <i>“There is noise nuisance with loud music, all night parties, swearing and drinking in the street.”</i></p> <p>54. <i>Regular anti-social behaviour.</i></p> <p>55. <i>“A.S.B seems to be an ongoing issue in HMO’s near to us.”</i></p> <p>56. <i>“A.S.B and noise are a very slow process and there is no out of hours service pushing tasks towards the police when there are hardly any police left.”</i></p> <p>57. <i>Parking isn’t taken into account reducing parking space for residents.</i></p> <p>58. <i>Additional criteria including parking provision should be considered as part of Additional Licensing.</i></p> <p>59. <i>Rents are too high.</i></p> <p>60. <i>Lack of maintenance reducing the value of nearby properties</i></p> <p>61. <i>Overcrowding & subletting</i></p> <p>62. <i>Using HMOs as halfway houses is not acceptable dragging vulnerable tenants into drug use who were previously clear.</i></p> <p>63. <i>Not keeping track of properties which are being rented out by their tenants and subletting.</i></p> <p>64. <i>Landlords take advantage of the demand for housing charging high rents to tenants.</i></p>

	<p>65. <i>Waste bins are not properly placed for collection so not collected.</i></p> <p>66. <i>“There are door-less gas and electric meters outside the properties with skips or building rubbish endlessly sitting in the front garden or yard”</i></p> <p>67. <i>I want someone to take gas safety issues seriously for current properties.</i></p> <p>68. <i>Discarded appliances are left outside.</i></p> <p>69. <i>“Mailboxes for tenants in HMOs are too small and landlords attempt to get over this by asking that free newspapers and community event flyers are not left for the tenants. Tenants in HMOs are as entitled as anyone else to read the local news and get discount coupons or know about local events.”</i></p> <p>70. <i>More HMOs in the area keeps the cycle of large houses and low prices so that some areas are blighted.</i></p>
Councils Response	<p>44-67. Licensing of HMOs may help to control some of these problems which have been identified in the private rented sector. This includes requiring landlords to repair and manage their properties more effectively by imposing licence conditions relating to ASB and the adequate provision of waste receptacles. Licenses also specify the maximum number of people permitted to live in the property for the amount of space and types of facilities available thereby reducing overcrowding. Other problems are more difficult to control including adequate provision of parking spaces associated with the property, reducing rents and house prices. The Council will work closely with landlords and letting agents to discourage unreasonable fees for tenants and reduce homelessness.</p>
Theme: General views about HMO licensing	
<i>Tenants / Residents / comments</i>	<p>68. <i>“The Council (Great Denham Parish Council) discussed this at its December Parish Council meeting and supports the extension of Additional Licensing.</i></p> <p>69. <i>“I am all for a system which would force landlords to make sure their households are of sufficient</i></p>

	<p><i>quality where there was a negative impact on neighbours” but this scheme only covers HMOs and not family houses.</i></p> <p>70. <i>“There is a great need to protect poor people from slum landlords. This will only come about by inspection of properties in addition to the property licensing scheme.”</i></p> <p>71. <i>“Rogue landlords who breach licence conditions or treat their tenants poorly should not be allowed to let property which should be strongly enforced.”</i></p> <p>72. <i>“Problem families get dumped into respectable neighbourhoods which no one seems to stop or prevent”.</i></p> <p>73. <i>“Landlords can charge very high rents but neglect the maintenance of properties causing problems for tenants who are powerless to change their situation”</i></p> <p>74. <i>“ Perhaps there could be a star rating for landlords in the way that there is for food hygiene”</i></p> <p>75. <i>“I should like to see a scoring /rating system for landlords used by councils as well as registration.”</i></p> <p>76. <i>“There should be standards for renting agents as well”</i></p> <p>77. <i>“There are so many people unable to afford a mortgage; private renting or social housing is a must these days.”</i></p> <p>78. <i>“Landlords should be required to keep their properties in good repair and the council should hold them account for it.”</i></p> <p>79. <i>“Rented properties should be subject to annual/periodic unannounced inspections. Properties should be audited for fire risk, gas and electrical safety, heating, warmth, damp and mould, hygiene, state of repair and provision of basic facilities.”</i></p> <p>80. <i>“I would like to see more unannounced inspections taking place”</i></p> <p>81. <i>“I believe that in my area many properties are HMOs that have not been licenced or investigated.”</i></p>
<p>Councils Response</p>	<p>68. The Council are committed to working with Parish Councils and to ensure that the HMO licensing scheme is a success.</p> <p>69. The current Additional Licensing proposals focus on licensing HMOs although there are powers for local authorities to adopt Selective Licensing schemes for family rented properties. The Council considered the evidence available and decided that HMOs were the main sector of the</p>

private rented market to target at the moment. The Council could introduce a Selective Licensing Scheme if there was sufficient evidence to demonstrate that there was low housing demand and high levels of ASB arising from rented family homes.

70. The Council will continue to deal with rogue landlords and will target their inspection programme based on the risk at the property as well as the compliance record of the landlord. The council will also carry out spot checks to make sure that landlords are properly licenced.
71. There are now legislative powers under the Housing and Planning Act 2016 to tackle rogue landlords who have been successfully prosecuted under the Housing Act 2004 in that they can now be issued with a banning order and placed on a national register. This will prevent them from operating an HMO in the future.
72. The Council understand your concerns and consider that by good management of their properties, landlords can reduce the impact of tenants causing neighbourhood problems.
73. The Council understand your concerns but have no control over the rents landlords charge. They are committed to working with landlords to try to keep rents to a reasonable level.
74. The Council are committed to publishing a register of landlord's who have been licenced and meet minimum standards for safety and management which will enable tenants to choose their accommodation. There are no plans to introduce a star rating scheme. The reason for this is that having consulted with other local authorities these types of schemes have little impact on driving up standards in the private rented sector, mainly because of a shortage in housing supply and it being voluntary.
75. See the response to question 6 above.
76. The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc.) (England) Order 2014, requires all letting agents and property management companies to belong to an approval scheme which include The Property Ombudsman, Ombudsman Property Services and Property Redress Scheme. Tenants can complain if a poor service is received. There is also a draft Bill going through parliament that will ban unnecessary letting agent fees.
77. The Council are in agreement that the private rented sector has an important role to play in the housing market.
78. The Additional HMO Licensing scheme will support the Council in requiring landlords to keep

their properties in a good state of repair.

79. As part of their routine work the Council regularly undertake unannounced inspections of properties which are potentially unlicensed HMOs and take enforcement action against those landlords who are operating illegally. HMOs are also routinely inspected to check against the standards in the Councils Good Practice Guide including fire, gas and electrical safety as well as repair and management at the property.

80 & 81. See answer 79 above.