

HOUSES OF MULTIPLE OCCUPATION - ADDITIONAL LICENSING CONTROLS: OUTCOME OF CONSULTATION & FINAL PROPOSALS

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Papers with report	Appendix 1 – Consultation Response Analysis Appendix 2 – Additional Licensing Conditions Appendix 3 – Schedule of Fees Appendix 4 – Equality & Human Rights Impact Assessment

HEADLINES

Executive Summary

This report follows the October 2025 Cabinet report which resulted in agreement to consult on the proposed Additional Licensing Policy and proposes the implementation of a borough-wide Additional Licensing Scheme for Houses of Multiple Occupation (HMO's) for a period of 5 years.

The report details the findings of the extensive public consultation exercise which took place between 31st October 2025 and 11th January 2026 and considers the feedback made by stakeholders and consultees.

Consultation activity was extensive and included a live web survey, promotions on all Council social media channels, posters and information leaflets in libraries and retailers across the borough and two in-person consultation events for landlords and residents.

There were 1000 survey responses and 3 separate individual responses to the consultation which showed significant support for additional controls through the implementation of Additional Licensing. Consultation highlights are listed below with further detail included in the main body of the report and Appendix 1.

- 80% agree with the proposed scheme.
- 797 responses say the scheme will help improve the quality of neighbourhoods.
- 779 responses say it will help identify poorly performing landlords.
- 75% agree that landlords should meet conditions to make sure that properties are safe and well managed.
- 58% agree with the proposed fee of £1,401.
- 88% of responses were from residents.
- 3% of responses were from landlords.
- 9% of responses were from tenants.

The aim of the Additional Licensing Policy is to address concerns such as poor housing conditions, anti-social behaviour, and safety risks associated with unlicensed HMOs, while supporting the Council's broader goals to improve living conditions and communities. This report recommends the designation of an additional licensing scheme to the whole Borough.

<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: Live in good quality, affordable homes in connected communities</p> <p>This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>And the Hillingdon Housing Strategy.</p>
<p>Financial Cost</p>	<p>There are no direct costs associated with the adoption of the final policy, however implementation of the new licensing scheme will require resources to increase capacity within the Private Sector Housing Team. Resourcing will be recovered through licence fees under the new scheme.</p>
<p>Select Committee</p>	<p>Residents' Services Select Committee</p>
<p>Ward(s)</p>	<p>All</p>

RECOMMENDATIONS

That Cabinet:

- 1) **Considers the consultation responses and analysis set out;**
- 2) **Considers the Equalities Impact Assessment in Appendix 4.**
- 3) **Agrees that the Council uses powers enacted under Section 56 of the Housing Act 2004 to designate the Additional Licensing Scheme for Houses of Multiple Occupancy to the whole borough.**
- 4) **Agrees the Additional Licensing Conditions detailed in Appendix 2.**
- 5) **Agrees the final Schedule of Fees detailed in Appendix 3.**
- 6) **Notes the implementation requirements and proposed timeline.**

Reasons for recommendation(s)

The Council is committed to ensuring that homes in the private rented sector are safe, well managed and well maintained.

Houses of Multiple Occupation (HMOs) provide an important source of affordable housing in the borough, and it is acknowledged that they fulfil a need within the overall housing stock of Hillingdon.

It is recognised that poor housing conditions and poorly managed HMOs can lead to adverse impacts on local neighbourhoods ranging from poor appearance and waste issues to more serious instances of anti-social behaviour and nuisance.

The Council recognises that poor standards in the private rented sector can have a detrimental impact on the wellbeing of residents and communities and is assessing whether there is a greater need for further regulation.

Hillingdon has made commitments to residents to scope and consider additional local regulation, through an Additional Licensing scheme and / or planning controls, to control the standards and numbers of HMOs in certain areas of the borough.

These aims support our overall Council ambitions for residents:

- Safe and Strong Communities
- Thriving Healthy Households
- A Thriving Economy

Full Council passed a motion on 11 July 2024, resolving to address issues outlined below:

"That this Council recognises the problems caused by unlicensed HMOs in the borough, from anti-social behaviour to poor housing conditions. This Council is committed to ensuring good quality housing in the borough and resolves that a report be sent to Cabinet considering the sufficiency of evidence required under Part 2 Housing Act 2004 to extend licensing obligations to all properties with 3 bedrooms housing multiple unrelated occupants and to commence consultation on the implementation of this additional licensing obligation where it is justified."

The Council made a commitment to residents to consider and evidence the viability of an Additional Licensing Policy. Upon completion of the Housing Tenure Survey and consideration of the full evidence, and consulting extensively on the proposed Additional Licensing Policy, it is proposed that the final Additional Licensing Policy, conditions and fees be approved and implemented.

The Housing Tenure Survey in Hillingdon presented compelling evidence in support of introducing an Additional Licensing Scheme for Houses in Multiple Occupation (HMOs). The survey explored the characteristics of the Private Rented Sector (PRS), the extent and condition of HMOs, and the impact of housing-related issues such as serious hazards and antisocial behaviour.

It found widespread concerns around poor property management, under-regulation, and tenant safety, particularly in HMOs where serious hazards were 3 times the national average. Many properties are not currently licensed, and there are indications of significant non-compliance among landlords.

The findings highlighted the need for stronger oversight and enforcement to address poor housing conditions and recurring issues such as noise disturbances, waste problems, and repeat anti-social behaviour (ASB) incidents.

The licensing scheme aims to improve housing standards, protect tenants, reduce community disruption, and promote responsible landlord practices. It will apply to all HMOs not already

covered by mandatory licensing and will run for five years, helping to create safer, more stable neighbourhoods across the borough.

Should the Cabinet approve the Additional Licensing Policy, it should be noted that there are statutory obligations which the Council must fulfil prior to the policy taking effect. It is proposed that the full implementation date is set at 24th August 2026 to allow the statutory requirements to be complied with.

Further information on the steps required for implementation is provided in Section 6 of this report.

Alternative options considered / risk management

1. Do nothing/continue with the current arrangements. This would not meet the commitments made in the Council motion and would not have any impact on the issues arising within the private rented sector leading to that Council motion, or future implications of the Renters Rights Act. This option is not recommended.
2. Consider the use of other powers to deal with issues with HMOs, i.e. further interventions and enforcement for housing standards breaches, use of ASB and enviro-crime powers, further education and engagement with private landlords to achieve higher standards of management within the sector. This option is viable and can be used either in isolation or alongside an Additional Licensing Policy, where justified. However, the Council motion recognises that the use of existing powers has not effectively controlled the impact of HMOs on local communities.
3. The Council could consider a partial Additional Licensing Policy which applies only to certain Wards, however, the evidence demonstrates that concerns across every data set is present in all Wards.

Democratic compliance / previous authority

The Cabinet approved the recommendations related to the public consultation in October 2025 and directed that the findings of the consultation be presented to Cabinet in February 2026 to include final recommendations on the proposed Additional Licensing Policy.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

1.0 Details of the proposal

- 1.1 At the Cabinet meeting on 23rd October 2025, it was agreed to undertake a statutory consultation on the proposed borough-wide Additional Licensing Policy. The Policy Evidence Pack, full schedule of conditions and proposed licensing fees also formed part of the consultation package.
- 1.2 The proposed scheme will apply to all shared HMO's with 3 or more persons living as two or more households sharing facilities such as bathrooms and/or kitchens.
- 1.3 The October Cabinet report presented data from the Housing Tenure Survey which took place in August 2025. This provided compelling evidence of concerns in the borough linked to poor housing conditions, antisocial behaviour and the overall impact on communities.
- 1.4 It found widespread concerns around poor property management, under-regulation, and tenant safety, particularly in HMOs where serious hazards were 3 times the national average. Many properties are not currently licensed, and there are indications of significant non-compliance among landlords.
- 1.5 The findings highlight the need for stronger oversight and enforcement to address poor housing conditions and recurring issues such as noise disturbances, waste problems, and repeat ASB incidents.
- 1.6 Additional Licensing schemes provide Councils with the option to regulate HMO's further than the limitations of the mandatory scheme. By licensing HMO's, Landlords will be expected to comply with a range of conditions relating to the condition of accommodation, behaviour of tenants and impact on communities.
- 1.7 Councils have additional powers under an Additional Licensing scheme to deal with resident complaints and may carry out enforcement in cases where licence conditions are not adhered to.

2.0 Consultation Activity

- 2.1 The overarching aim of the consultation activity is to support the successful delivery of the statutory consultation required within the Housing Act 2004, which in turn, enables the Council to make a decision about the introduction of additional licensing for HMOs in Hillingdon. The aims of the activity were:
 - To inform those likely to be affected by a potential decision pending consultation and Cabinet approval on whether or not to introduce additional licensing for HMOs.
 - To capture any representations made by those impacted by a potential decision pending consultation and a Cabinet decision on whether to introduce additional licensing for HMOs.

- 2.2 The Council conducted the public consultation for 10 weeks from 31st October 2025 to 11th January 2026 and invited views on the proposed additional licensing scheme, including the scope, conditions, fees, and potential alternatives.
- 2.3 Engagement was carried out via an online survey which was heavily promoted through informative posts via the Councils social media channels throughout the consultation period. The consultation was launched via a press release. Social Media engagement activity is detailed below showing a high response rate to posts overall.
- Facebook - 5 different posts including a video:
 - 179,657 views
 - 638 link clicks
 - Instagram - 4 different posts including a video:
 - 11,085 views
 - 33 link clicks (no direct link included on Instagram so this is a push to the 'link in our bio' so not uncommon to be low)
 - Twitter/X - 5 different posts including a video:
 - 3,097 impressions
 - 39 link clicks
 - Instagram/Facebook stories - 3 posts:
 - 3,189 views
 - 43 link clicks
 - 3 posts via the Council Whatsapp channel with 2,748 followers
 - YouTube - 437 video views - Hillingdon Council managing HMOs and protecting residents (article 4 and additional licensing mentioned)
 - E-newsletter - Hillingdon People Extra - more than 35,500 recipients - included in two editions (August and November) - 282 link clicks
- 2.4 The consultation pack and links to the survey were emailed directly to statutory consultees, industry representatives, residents & tenants associations and partner organisations.
- 2.5 A feature was included in the Nov/Dec edition of Hillingdon People with details about how to respond.
- 2.6 Officers carried out two consultation events in December which targeted residents and landlords. These events included officer presentations on the scheme and provided a forum to raise concerns and questions about the proposed scheme and HMO's in general. Both events were well attended.
- 2.7 Leaflets and posters were distributed around the borough in libraries and retail locations to highlight the consultation and invite responses.

3.0 Consultation results and analysis

- 3.1 The consultation survey questions invited views on:
- Agreement/disagreement with the scheme
 - Likely impact of the scheme i.e. positive impact on housing conditions

- Suggestions for alternative measures
- Agreement/disagreement with proposed conditions
- Agreement/disagreement with proposed fees
- Suggestions to improve the condition/management of HMO's
- Free text boxes included for additional comments

3.2 A total of 1003 responses were received through the online survey, including 3 individual responses submitted via email.

3.3 Individual responses were submitted by:

- Property Mark – A professional trade body representing estate and lettings agents across the UK.
- Safe Agent – An accreditation organisation representing lettings and management agents in the private rented sector.
- Cllr Douglas Mills, Ward Councillor for Ruislip Manor Ward.

3.4 The full consultation analysis report is included in Appendix 1. A summary of responses to each question is highlighted below.

Overview –

- 80% agree with the scheme.
- 797 responses say the scheme will help improve the quality of neighbourhoods.
- 779 responses say it will help identify poorly performing landlords.
- 75% agree that landlords should meet conditions to make sure that properties are safe and well managed.
- 58% agree with the proposed fee of £1,401.
- 88% of responses were from residents.
- 3% of responses were from landlords.
- 9% of responses were from tenants.

3.5 **Question 1 – Agreement with the introduction of the scheme**

80% (812) of responses agreed that the Council should introduce the scheme. 15% (155) responded with 'no' indicating disagreement with the proposal. 5% (53) responded with 'maybe'.

3.6 **Question 2 – For those who responded 'no' to Q1, why?**

155 responses said 'no' to the scheme, however when asked why in Question 2, the majority of responses were suggesting an outright ban on HMO's with many citing community impacts, ASB, environmental concerns, financial motivation and immigration as main drivers for their opposition.

3.7 **Question 3 – positive impacts of additional licensing**

There were high response rates to this question with responders indicating that additional licensing would have a positive effect on housing conditions, safety standards,

neighbourhood impacts, tenant's rights, poor performing landlords and supporting compliant landlords.

3.8 Question 4 – Alternative measures

58% (587) respondents indicated 'yes' when asked if the Council should consider any alternative measures to additional licensing. 42% (433) respondents said 'no'.

3.9 Question 5 – State alternative measures

The 58% (587) respondents who answered 'yes' to Q4 were asked to comment on what alternatives the Council should consider. 572 comments were received to this question with a high proportion suggesting an outright ban on HMO's or limiting the number of HMO's. Many comments also suggested stronger enforcement powers, Article 4 directives, alternative housing solutions and more restrictive licensing schemes or a shorter duration for licences.

3.10 Question 6 – Further comments on the proposals

There were 459 comments received to this question with many responders voicing concerns and opinions about the impact of HMO's. Many comments promoted stricter enforcement and penalties with strong opposition to HMO's in residential areas.

3.11 Question 7 – Agreement with proposed conditions

75% (760) agreed with the proposed conditions. 11% (110) disagreed with the conditions and 14% (145) responded with 'maybe'.

3.12 Question 8 – Suggestions for improving conditions and management of HMO's

664 comments were received to this question with the majority of respondents citing strong opposition to the principle of HMO's with many stating that the Council should introduce tougher enforcement and penalties with more inspections being carried out. Other suggestions included higher Council Tax, Landlord accreditation, public reporting systems, enforcement teams funded by fees, and waste management.

3.13 Question 9 – Agreement with proposed fee

58% (587) of respondents responded with 'yes' in agreement with the proposed fee of £1401. 26% (261) of respondents responded with 'no', not in agreement. 17% (171) responded with 'maybe'.

3.14 Question 10 – For those who responded 'no' to Q9, why?

246 comments were received to this question with the majority view stating that the fee is too low and many suggestions were for a higher fee between £3000 - £10,000 per year with an extreme suggestion of £100,000. The minority view was concerned with high running costs of the licence being passed onto tenants and the impact on affordability.

3.15 Question 11 – Further comments on proposed fees

471 comments received with high levels of support for higher fees and suggestions for annual fees or tiered pricing linked to property value or rental income. A minority of responses were concerned with the cost of living pressures and landlords leaving the market if licensing costs are too high.

4.0 Comments to consultation responses and themes

- 4.1 Appendix 1 details the range of responses and themes and provides details on the Council's response to comments and suggestions made by consultees.

5.0 Links to Corporate Priorities

- 5.1 The Hillingdon Housing Strategy highlights the need to develop a more detailed understanding of the private rented sector including its condition linked to potential concerns regarding fire precautions, inadequate heating, sub-dividing of properties, overcrowding, damp and mould growth and poor housing conditions for vulnerable households. This included an action to 'gather evidence regarding the prevalence of poor conditions in the different parts of the private rented sector and consider the feasibility of different discretionary licensing options.'
- 5.2 The evidence will inform wider strategic and policy issues which the Council can consider. For example, conversions of sheds/garages/outbuildings, exploitation, modern slavery and trafficking, those arriving to the UK through Heathrow, vulnerable tenants etc.
- 5.3 The evidence from the Housing Tenure Survey has indicated 1,871 hidden HMOs, which could lead to additional Council Tax and Business Rate income streams for the Council.

6.0 Implementation

- 6.1 Should the Cabinet approve the Additional Licensing Policy, it should be noted that there are statutory obligations which the Council must fulfil prior to the policy taking effect.
- 6.2 Section 55 of the Housing Act 2004 requires the Council to make arrangements to secure the effective implementation of the licensing regime and to ensure that licence applications are determined within a reasonable time. In Hillingdon, this will require additional staffing in the Private Sector Housing Service, online application capability and changes to existing triage and case management systems.
- 6.3 Section 57 of the Housing Act 2004 requires the Council to ensure that the Additional Licensing Policy is consistent with the borough's Housing Strategy and to take a co-ordinated approach to deal with homelessness, ASB and empty properties in the private rented sector. Preparation for this is underway with Housing and ASB teams with a working group being established.
- 6.4 Section 58 of the Housing Act 2004 confirms that the designation of an Additional Licensing Policy area cannot take effect any earlier than 3 months after the designation is made.
- 6.5 Section 59 of the Housing Act requires the Council to publish a notice of the designation.
- 6.6 In order for the Council to comply with these requirements, it will need to address resourcing and system requirements within the Private Sector Housing Service to ensure that there is staffing capacity, application pathways and appropriate systems in place to effectively administer and enforce the scheme.

6.7 It should also be noted that this is a significant new policy for Hillingdon and that private rented sector landlords will need fair and reasonable notice of the scheme so that they can make applications. It is highly likely that many properties will require upgrades or other physical changes to bring them into compliance with the scheme and conditions, therefore it is reasonable to provide a time frame to complete this.

6.8 The following timeline for implementation is proposed:

Designation made
19th February 2026

Statutory 3 month period before designation can come into effect (Section 58 Housing Act 2004)
19th May 2026 (Statutory 3 month period ends)

Landlords can submit applications for new licences
20th May 2026

Deadline for landlord applications and full compliance required
23rd August 2026

Enforcement provisions commence and compliance expected
24th August 2026

7.0 Conclusion

7.1 The analysis of Housing Tenure and borough profile data results in a recommendation for a borough wide Additional Licensing Policy for Houses of Multiple Occupation (HMOs).

7.2 The consultation activity was widespread and generated over 1000 survey and individual responses with 80% of responders indicating support for implementing the policy.

7.3 The Council must now assess the resources required to implement Additional licensing and provide landlords with fair and reasonable notice of the scheme.

7.4 The Council must also consider the implications of the Renters Rights Bill, which will introduce new regulatory responsibilities and enforcement powers.

8.0 Article 4 Direction

The Council enacted an immediate Article 4 Direction on 10th December 2025 which implements significant changes regarding Planning Permissions for HMO's. The Council will now require full planning permission for the conversion of dwellings (C3 use class) to a HMO (C4 use class). This direction applies to the whole borough.

Financial Implications

Additional licensing for Houses of Multiple Occupancy is currently at a decision stage and being managed within the existing resource and as such will not require any immediate financial budget.

Approval of this new policy is being sought by Cabinet and upon this decision costs connected to these works have been assessed for budgeting purposes to ensure any operational ongoing financial impact will be fully contained within the service area.

The fee of £1,401 has been calculated to ensure full cost recovery of administration and enforcement of the scheme and the public consultation indicated significant agreement with the fee proposed.

Within the Fees and Charges schedule, it is proposed that the current £50 flat-rate discount for accredited landlords or managing agents be replaced with a 10% discount.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

Evidence shows that a significant proportion of HMOs in the borough are being managed ineffectively, proven by the cumulative presence of serious housing hazards and/or significant and persistent ASB.

For residents, the measures aim to improve housing standards, reduce anti-social behaviour, and enhance neighbourhood quality. Benefits would include better landlord accountability, safer living conditions, and more consistent enforcement.

Residents and the wider community have had an opportunity to submit their views to the Council for full consideration through a full public consultation exercise.

The Human Rights and Equalities Impact Assessment has been updated in consideration of responses to the consultation.

Consultation & Engagement carried out (or required)

A full public consultation was carried out between 31st October 2025 and 11th January 2026. Full details and findings of the consultation have been included within the body of the report and appendices.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting approval is sought for the Additional HMO Licensing Policy and associated licence conditions, together with the proposed Fee Schedule.

Furthermore, it is noted the programme to implement the Additional Policy to date has utilised existing resources to contain the costs within existing budgets, a growth provision has been included within the MTFS refresh to create the further capacity needed in advance to meet the requirements to deliver the new policy within the first year, with this amount being reversed in future years when the policy has been embedded and the full cost recovery comes in to effect.

Additionally, it is noted the new Additional Policy and Fee Schedule, has been assessed to ensure full cost recovery of the services, with the proposed fees of the scheme presented for approval within this report.

Legal

Legal Services notes the proposed implementation of the Additional Licensing Policy together with the appendices, consisting of: Consultation Response Analysis; Additional Licensing Conditions; Schedule of Fees; and Equality & Human Rights Impact Assessment. The main provisions from the relevant legal framework under the Housing Act 2004 are already included within the body of the report and referenced under the 'background papers' section.

The scheme is proposed under Part 2 of the Housing Act 2004 (Licensing of Houses in Multiple Occupation) and will permit the Council to designate areas for additional licensing of HMOs not already covered by mandatory licensing. The proposal is to implement a borough-wide additional licensing scheme.

The Council has undertaken the necessary steps to comply with the statutory requirements, including assessing the management of HMOs in the designated areas, consulting those affected, ensuring consistency with its housing strategy, and considered alternative measures.

Section 56 of the Housing Act gives the Council the power to designate areas for additional HMOs licensing if a significant proportion of HMOs in the area are managed ineffectively, leading to problems such as anti-social behaviour or poor housing conditions for occupants or the public. Extensive research has been carried out and evidence gathered to justify a borough-wide approach as presented from the Housing Tenure Survey which took place in August 2025 and referenced in the October Cabinet report. Key features of the survey identified:

- An estimated 2,537 HMOs exist in Hillingdon, of which only 666 are licensed indicating 1,871 hidden HMOs.
- 30% of HMOs in Hillingdon are predicted to have serious housing hazards, three times the national average.
- 3,850 ASB incidents linked to HMOs over five years, with repeat ASB indicating poor management.
- HMOs are dispersed across all wards, not concentrated in specific areas
- Existing enforcement powers under the Housing Act 2004 are reactive and slow, and voluntary schemes lack reach and enforceability.

Section 56(3)(a) of the Housing Act 2004 requires the Council to take reasonable steps to consult persons likely to be affected by the designation and consider any representations made during the consultation process. The consultation must include a draft proposal that clearly identifies the area to be designated, its consequences, and the likely licence conditions to be imposed. The

Council has taken reasonable steps to consult persons likely to be affected by the designation, including landlords, tenants, and other residents. The Council conducted a public consultation for 10 weeks from 31 October 2025 to 11 January 2026 and the full consultation analysis is in Appendix 1.

Section 57 of the Housing Act 2004 mandates that Councils ensure the designation aligns with their overall housing strategy and adopt a coordinated approach to address issues such as homelessness, empty properties, and anti-social behaviour in the private rented sector. The Council has ensured that the designation aligns with its overall housing strategy which highlights the need to develop a more detailed understanding of the private rented sector. Preparation is underway with the Council's Housing and ASB teams with a working group being established to ensure the Council adopts a coordinated approach to address issues such as homelessness, empty properties, and anti-social behaviour in the private rented sector.

The Council has evaluated whether alternative measures could effectively address the identified problems and conclude that the designation will significantly assist in resolving these issues. This evaluation complies with section 57(4) of the Housing Act 2004.

Regulation 9 of the Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) Regulations 2006 requires the Council to publicise the designation within seven days of its confirmation or making. The notice must be placed on a public notice board at one or more public office within the designated area, published on the Council's website, and published in at least two local newspapers.

BACKGROUND PAPERS

- [Housing Act 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- [The Licensing and Management of Houses in Multiple Occupation \(Additional Provisions\) \(England\) Regulations 2007 \(legislation.gov.uk\)](https://www.legislation.gov.uk)
- [Houses in multiple occupation and residential property licensing reform: guidance for local housing authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Cabinet update report – July 2025](#)
- [London Borough of Hillingdon - Agenda for CABINET on Thursday, 23rd October, 2025, 7.00 pm](#)
- [Additional Licensing Proposal Evidence Pack.pdf](#)
- [Article 4 Direction HMOs](#)