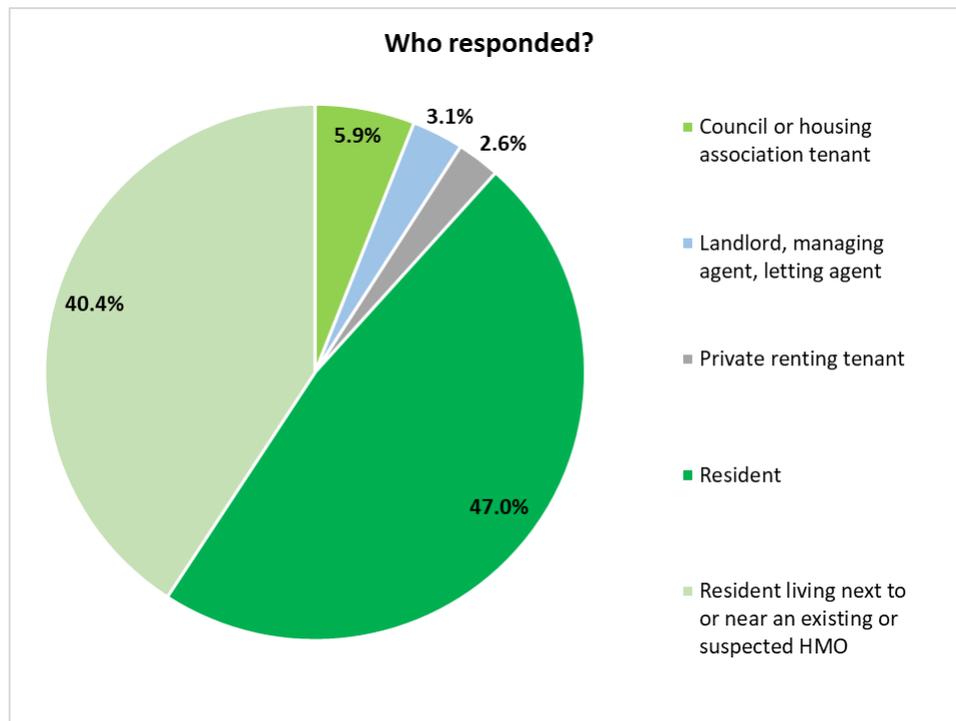


Appendix 1 - Additional Licensing Scheme for HMOs, consultation analysis

Online Consultation Outcomes

- Online for 72 days (>10 weeks), ended 11th January 2026
- 1,000 responses received
- Average time to complete 28 minutes
- 2,500 free text comments received across 6 questions

Who responded - Demographics



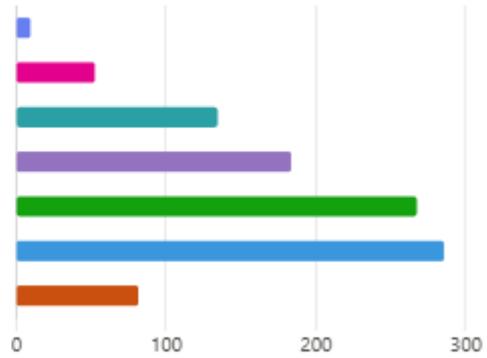
By area of borough

A good spread of responses from across the borough were received; 32% from the North of the borough, 39% from Central areas and 29% from the South:

| Area | Postal area | Responses | Where in borough? |
|---------|-------------|-----------|---|
| North | HA4 | 203 | Ruislip |
| | HA5 | 33 | Eastcote / Pinner |
| | HA6 | 27 | Northwood |
| | UB9 | 57 | Harefield |
| Central | UB10 | 222 | Ickenham and Hillingdon East |
| | UB8 | 170 | Uxbridge |
| South | UB3 | 67 | Hayes |
| | UB4 | 90 | Hayes / Yeading |
| | UB7 | 130 | Yiewsley / West Drayton / Heathrow Villages |

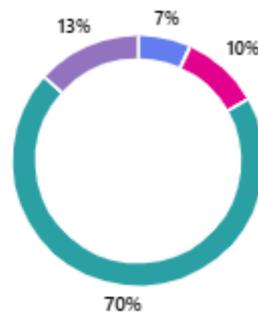
Age – 54% aged 55+

| | |
|-------------------|-----|
| Under 25 | 9 |
| 25-34 | 52 |
| 35-44 | 134 |
| 45-54 | 183 |
| 55-64 | 267 |
| 65+ | 285 |
| Prefer not to say | 81 |



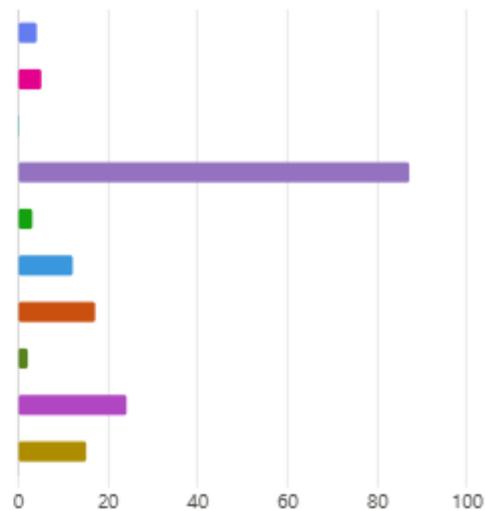
Disability – 70% answered no, with 17% saying yes and that their day-to-day activities limited a lot or a little:

| | |
|-----------------------|-----|
| Yes, limited a lot | 68 |
| Yes, limited a little | 102 |
| No | 706 |
| Prefer not to say | 135 |



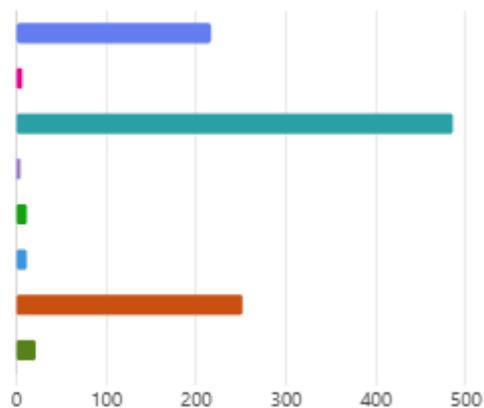
51% said they had a physical disability:

| | |
|--|----|
| Vision (e.g. due to blindness or partial sight) | 4 |
| Hearing (e.g. due to deafness or partial hearing) | 5 |
| Dual Sensory Loss | 0 |
| Physical Disability (e.g. mobility, such as difficulty walking short distances, climbing...) | 87 |
| Learning or concentrating or remembering | 3 |
| Mental Health | 12 |
| Stamina or breathing difficulty | 17 |
| Social or behavioural issues (e.g. due to neuro diverse condition such as Autism,...) | 2 |
| Prefer not to say | 24 |
| Other | 15 |



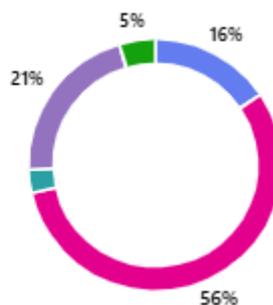
Religion - 48% of respondents stated Christian, with 25% preferring not to say:

| | |
|-------------------|-----|
| No religion | 216 |
| Buddhist | 6 |
| Christian | 485 |
| Jewish | 4 |
| Muslim | 11 |
| Sikh | 11 |
| Prefer not to say | 251 |
| Other | 21 |



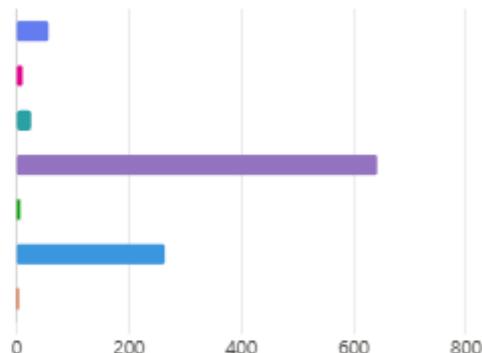
Relationship status – 56% are married, 21% preferred not to say:

| | |
|-------------------|-----|
| Single | 156 |
| Married | 560 |
| Civil Partnership | 30 |
| Prefer not to say | 210 |
| Other | 46 |



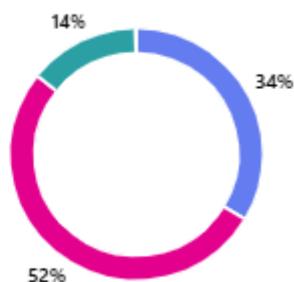
Ethnicity - 64% of respondents stated they are White, 26% preferred not to say:

| | |
|---|-----|
| Asian or Asian British ethnic group or background (Indian, Pakistani, Banglades... | 56 |
| Black, Black British, Caribbean, or African ethnic group or background (Caribbean,... | 10 |
| Mixed or multiple ethnic group or background (White and Black Caribbean,... | 25 |
| White group or background (English, Welsh, Scottish, Northern Irish or British... | 641 |
| Other ethnic group or background (Arab, any other ethnic group) | 6 |
| Prefer not to say | 263 |
| Other | 3 |



Gender - 52% are female, 34% male and 14% preferred not to say:

| | |
|-------------------|-----|
| Male | 337 |
| Female | 523 |
| Prefer not to say | 142 |
| Other | 1 |



Quick snapshot of responses

Support for the scheme

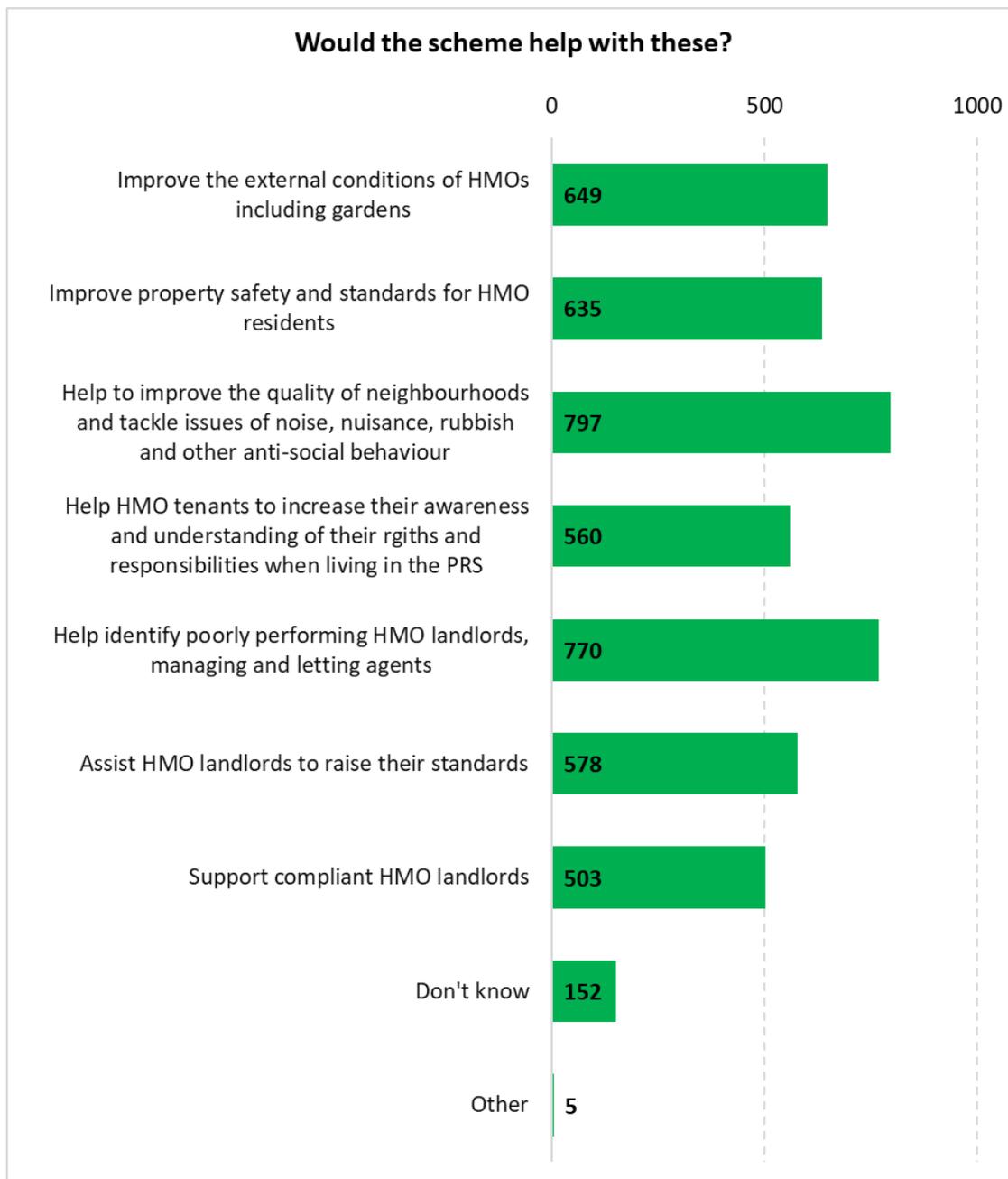
Quick snapshot of responses:

- 80% agree with the proposed scheme
- 797 of those who responded say the scheme will help improve the quality of neighbourhoods
- 770 of those who responded say the scheme will help identify poorly performing landlords
- 58% say we should consider alternative measures
- 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

Over 2,500 comments were received across the six free text boxes.

- many people 'confused' the need for responses on the licensing scheme for a general dislike of HMOs and the behaviour of residents within them
- whilst 58% agree with the proposed fee, many suggest an annual cost or a scheme based on the number of bed / residents
- concerns over safety of surrounding areas and ASB, lack of enforcement, degradation of neighbourhoods
- not many comments focus on the welfare of those who live in HMOs
- a feeling that the borough needs family sized homes, not HMOs and that landlords are 'only in it for the money'
- concerns for the density of the population and lack of infrastructure to support any growth in the population
- many also raised concerns about 'beds in sheds'
- many question the council's enforcement practices

Would an additional licensing scheme help with any of the following (all respondents)?



Key themes from consultation (all 2,500 comments) and Hillingdon's response

| Theme | Indicative comments | Hillingdon's response |
|--|--|--|
| 1 Strong opposition to HMOs in general | <p>Many respondents call for zero HMOs or a complete ban, citing concerns about:</p> <ul style="list-style-type: none"> • Safety risks (crime, drugs, violence, intimidation) • Impact on families and children, especially near schools • Loss of community cohesion and neighbourhood character <p>Emotional language reflects fear and frustration, with repeated mentions of illegal immigration and anti-social behaviour.</p> | <ul style="list-style-type: none"> • The Council recognises the frustration felt by residents concerning HMO's across the borough. However, the Council has no legal power to enact an outright ban for these properties and it is recognised that HMOs' form a crucial part of the borough housing stock, providing more affordable housing compared to other properties. • The Council is recommending the implementation of Additional Licensing so that conditions, management and community impacts can be robustly monitored and enforced where necessary. • Landlords will have to comply with HMO Licence Conditions which cover a range of compliance requirements to limit the impacts of HMO's. • The proposed additional licensing scheme will further strengthen our regulatory toolkit, enabling more effective oversight of HMOs. • Furthermore, the Council has recently enacted an immediate Article 4 Direction which now requires all proposed conversions of dwellings to HMO's, to go through the full Planning Application process. |
| 2 Safety concerns, community cohesion and neighbourhood character | <p>Many comments highlight fears about antisocial behaviour, crime, and illegal activities linked to HMOs. Examples include drug use, noise, and violent incidents.</p> <p>Waste & street scene: Persistent issues with fly tipping, overflowing bins, lack of bin storage; requests for mandatory waste plans, more bins, and fines.</p> <p>Noise & ASB: Desire for faster response routes, dedicated HMO team, and hotline/portal for anonymous reports with feedback loops to residents.</p> <p>Residents report feeling unsafe and that HMOs disrupt family-oriented neighbourhoods, causing stress and</p> | <ul style="list-style-type: none"> • The Additional Licensing scheme provides the Council with additional powers to tackle the impacts of HMO's on communities. This is done through compliance with licence conditions and enforcement actions where necessary. • The Additional Licensing scheme forms part of the Councils overall capabilities to deal with anti-social behaviour and enviro-crime. The Council has a coordinated approach to tackling anti-social behaviour and ensures that cases and information is shared between teams to work on response solutions. • Resources within the Private Sector Housing service will be scoped to ensure that the Council has the required number of professionally qualified officers to administer and enforce the scheme. |

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| | <p>lowering quality of life. Fear of loss of family housing stock and declining property values.</p> <p>Concerns about too many occupants in small properties, leading to parking issues, rubbish overflow, and pressure on local services (schools, healthcare, drainage).</p> <p>Requests for limits on the number of HMOs per street/ward and consultation with neighbours before approval.</p> <p>Calls to expand council housing, studios/hostels for single people, and non-HMO solutions.</p> | <ul style="list-style-type: none"> • There are limitations on the Councils powers to influence the private housing sector to provide more housing of a particular type, i.e. studios, hostels etc. • Licences will provide a system of regulation where checks on properties and checks on landlords will form part of the licensing process. • The enactment of the Article 4 Direction is likely to have an impact on the placement and overall number of HMO's due to the requirement for full planning permission. • HMO licensing focuses on; Property condition and layout, Landlord suitability, Management arrangements. It does not consider the number of HMOs in an area or potential nuisance, and there is no public consultation. Furthermore, the Council does not have legal power to refuse HMO applications on the basis of proximity of other HMO's, saturation of HMO's in a locality or on amenity of the local area. |
| <p>3 License design, funding and fees</p> | <p>Widespread agreement that the proposed fee (£1,401) is too low compared to landlords' profits. Suggestions range from £5,000 to £10,000 per licence, or fees based on:</p> <ul style="list-style-type: none"> • Per Room / Per Tenant Charges • Percentage of Rental Income • Annual Fees Instead of 5-Year Licences <p>Rationale: Higher fees would:</p> <ul style="list-style-type: none"> • Deter landlords from converting family homes into HMOs • Fund enforcement and inspections • Ensure only serious landlords operate HMOs | <ul style="list-style-type: none"> • The fees have been calculated in accordance with the principles set out in the Housing Act 2004, ensuring that they are cost neutral. This means that the fee structure is designed solely to recover the costs of establishing, administering and enforcing the scheme. The Council is not allowed to generate a surplus or create income to subsidise other Council services. The cost of inspections and enforcement has been built into the proposed fee. • The Council could opt to provide a different fee structure and an instalment system for licence fees, however, the Council has avoided overly complex fee structures and payment systems. Such complexity will require additional resources to manage and would ultimately lead to higher fees for applications. • The Council believes it fair and proportionate to offer a financial incentive to landlords who demonstrate good management practices and good compliance. It was proposed to introduce a discount of £50 for accredited/registered landlords, however consultation has indicated that this would not be a large enough incentive for Landlords to seek accreditation. It is proposed in the fee schedule to increase this discount to 10%, representing a monetary discount of £140.10 on the fee of £1401. |

Conditions: Mandatory **garden/externals upkeep**, bin storage, parking plans, complaint response SLAs, and landlord accreditation/training.

Penalties & Fines: Calls for substantial fines (£10,000+) for non-compliance, illegal conversions, and antisocial behaviour.

Council Costs & Resources: Concerns that enforcement will require significant funding and staffing. Many suggest fees should cover inspection costs and community impact.

Economic Impact on Tenants: Some fear higher fees will be passed on to tenants, making housing less affordable.

Affordability objections: A minority warn higher fees will be passed to tenants; some call the scheme “money-making”.
A smaller minority argues for **lower/targeted fees** and focusing only on **rogue landlords**.

Target rogue landlords, not everyone: Several argue that existing legal checks (Gas Safety, EICR) already cover core safety and the council should focus enforcement on landlords who fail these basics rather than expanding borough-wide licensing.

Opposition to borough-wide schemes: Preference from some for **targeted/selective licensing** in hotspots instead of a blanket approach.

- The Council believes that the proposed fee of £1401 represents good value for money over the 5 year licence period and should be a manageable cost for maintaining high standards of property management.
- The scheme has been proposed to apply to the whole borough. This is because of compelling data from the Housing Tenure Survey showing concerns across all data sets in every ward. If the Council were to apply the scheme to only certain wards, it would create an inconsistent scheme of regulation and could see the displacement of problem HMO’s to wards where the scheme does not apply. Therefore, the Council is committed to introducing the scheme across the whole borough.

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| <p>4 Enforcement, accountability and inspections</p> | <p>Calls for regular inspections (annual, more frequent or unannounced).</p> <p>Strong demand for strict penalties for non-compliance:</p> <ul style="list-style-type: none"> • Fines up to £30,000 • Licence revocation for repeat offenders <p>Suggestions for mandatory landlord accreditation, DBS checks for tenants, and public registers of HMOs.</p> <p>Emphasis on zero tolerance for rogue landlords and illegal conversions (eg “beds in sheds”).</p> <p>Desire for swift prosecutions, heavy fines, and licence revocation for repeat non-compliance (including waste, ASB, overcrowding, planning breaches, beds in sheds).</p> <p>Landlord accountability: Make landlords responsible (and fineable) for waste/rubbish, garden condition, parking arrangements, and ASB linked to their properties.</p> <p>Resource realism: Repeated doubts about LBH capacity to inspect / enforce HMOs; requests that fees fully fund a larger inspection/enforcement team and cross council working (Housing, Planning, ASB, Highways).</p> <p>Ideas include points-based licences, “name and shame” approaches, and bonds refundable only for clean compliance.</p> | <ul style="list-style-type: none"> • It is recognised that the introduction of Additional Licensing will place additional resource requirements on the Private Sector Housing Service. This will require additional officers who possess the skills and training to administer and enforce the scheme. • Following the outcome of the consultation, the Council will scope the additional resources required. • The Council has existing powers to deal with beds in sheds and issues with housing standards within the private rented sector. These powers provide options for substantial fines and licence revocation. The Council will consider the overall enforcement capabilities and capacity of the Private Sector Housing Team as part of the resourcing strategy for Additional Licensing. • Licences will include tailored conditions to support the proper management and operation of each HMO, reinforcing the Council’s wider efforts to improve neighbourhood standards and reduce anti-social behaviour. |
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| <p>5 Planning controls and spatial limits</p> | <p>Caps & spacing rules: Limit the number of HMOs per street/ward, set minimum distances between HMOs, and impose occupancy caps per dwelling aligned to size/amenities.</p> <p>Article 4 & planning permission: Widespread support to extend Article 4 and require planning permission for all HMOs/small HMOs; prevent conversions in family dominated residential streets.</p> <p>Location sensitivity: Some want restrictions near schools and on narrow residential roads; others suggest confining HMOs to main roads/detached houses.</p> | <ul style="list-style-type: none"> • The Council’s HMO licensing policy now considers a property's planning status. However, licensing and planning are separate legal processes with different purposes. • HMO licensing focuses on; Property condition and layout, Landlord suitability, Management arrangements. It does not consider the number of HMOs in an area or potential nuisance, and there is no public consultation. Furthermore, the Council does not have legal powers to refuse HMO applications on the basis of proximity of other HMO’s, saturation of HMO’s in a locality or on amenity of the local area. • Planning permission is required for all new HMOs under the borough-wide Article 4 Direction and allows the Council to assess; Impact on neighbours and local character, Cumulative effects of HMOs, Community input through consultation. Planning processes and consultation can consider proximity, saturation and amenity of the local area. • Landlords must comply with both regimes. A licence does not grant planning consent, and vice versa. • To ensure coordination, the Council maintains regular communication and collaboration between planning and licensing teams, helping to manage permissions and complaints effectively. |
| <p>6 Tenant / landlord vetting and behaviour</p> | <p>Calls for:</p> <ul style="list-style-type: none"> • Background checks (criminal history, immigration status) • Restrictions on all-male HMOs or high-risk occupants <p>Some suggest DBS checks and limits on occupancy per property.</p> <p>Right to rent & ID checks: Calls for proof of ID/immigration status, sometimes DBS checks (where lawful/appropriate), and clearer “fit and proper” expectations for managers.</p> | <ul style="list-style-type: none"> • The Council has carefully considered the requests for criminal background checks and immigration checks on tenants. The Council is only permitted to require DBS checks for licence holders or managers, and only where proportionate to the “fit and proper person” assessment. The Council is not permitted to require DBS checks or background checks on occupants. To do so would fall outside the statutory purpose of licensing and would amount to unlawful interference with tenants’ rights. • The Council is unable to regulate the gender mix of residents or restrict specific categories of tenant, such as all-male groups or individuals perceived as high-risk. Such restrictions would breach the Equality Act 2010 and would exceed the purpose of Part 2 of the Housing Act 2004, which is focused on property condition and management rather than tenant demographics. It is also recognised that decisions relating to tenant selection are business matters for landlords and cannot be directed through HMO licensing. |

Clear house rules & induction: Tenant **welcome packs** on rubbish, parking, noise, and community norms; visible standards posted in properties.

Calls for **clear landlord accountability** for tenant behaviour affecting the public realm (waste, noise, parking).

Some warn that holding landlords responsible for all tenant behaviour can be **legally challenging** without effective eviction routes.

- The Council acknowledges the requests for DBS checks on tenants and adjusted occupancy limits. The Council can only impose occupancy limits that are based on statutory standards, including room size requirements, levels of provision for kitchens and bathrooms, and fire safety. These limits must be evidence-based and non-discriminatory. The Council cannot set conditions relating to the personal profile, background, or characteristics of the occupants.
- Landlords retain a statutory duty to carry out Right to Rent checks. The Council can require applicants to confirm that they have systems in place to comply with these duties. However, the Council cannot require landlords to submit copies of immigration documents or conduct additional checks beyond those required under the Immigration Act 2014. Any attempt to do so would duplicate Home Office functions and could be considered discriminatory.
- The Council considers it appropriate and proportionate to require clear house rules and written tenant inductions. These measures support effective management practices and ensure that tenants understand their responsibilities in relation to waste disposal, recycling, noise, fire safety, and parking. The introduction of welcome packs and the display of key information within the property is consistent with Schedule 4 of the Housing Act 2004 and promotes compliance with the HMO Management Regulations 2006.
- The Council agrees that clear standards should be visibly displayed within HMOs. Requirements may include waste and recycling instructions, anti-social behaviour expectations, contact details for the manager, fire safety notices, and a copy of the licence. These measures provide transparency and assist both tenants and enforcement officers, reflecting good practice used by many local authorities nationally.
- The Council acknowledges public concerns regarding tenant behaviour affecting the wider community, including noise, waste, fly-tipping and parking issues. The Council can impose conditions requiring landlords to put in place appropriate management systems. These may include documented ASB procedures, evidence of prompt and reasonable steps in response to complaints, records of warnings issued to tenants, and

| | | |
|--|--|---|
| | | <p>cooperation with the Council or the police where necessary. These expectations are consistent with Schedule 4 mandatory licence conditions and the HMO Management Regulations 2006.</p> <ul style="list-style-type: none"> • The Council recognises that there are legal limits to landlord control over tenant behaviour. Licensing cannot require landlords to guarantee that no nuisance will occur, nor can it require eviction on demand or impose strict liability for all tenant actions. Landlords must comply with statutory eviction procedures set out in the Protection from Eviction Act 1977 and the Housing Act 1988. As such, licence conditions must focus on requiring landlords to take reasonable and proportionate steps, rather than achieving absolute behavioural outcomes. • In setting licence conditions, the Council must ensure that they are practical, proportionate and enforceable. The Council will require landlords to have appropriate management systems in place, including written policies, clear records, and demonstrable action when issues arise. The Council cannot impose conditions that would require policing of tenant behaviour or conditions that would be impossible for landlords to fulfil. • The Council’s approach ensures that only lawful, proportionate and evidence-based conditions are imposed. This maintains fairness for responsible landlords, supports higher management standards, and ensures that the licensing scheme remains robust, enforceable and compliant with statutory requirements. |
| <p>7 Transparency and communication</p> | <p>Residents want clear reporting channels for complaints and neighbour notifications when an HMO is proposed.</p> <p>Public registers: Publish address/owner/manager details (within legal bounds), inspection history, and a searchable HMO register.</p> | <ul style="list-style-type: none"> • The Council is committed to responding to concerns about HMOs and ensuring that both landlords and tenants play their part in maintaining safe, well-managed homes. • Residents can report suspected unlicensed HMOs or concerns about licensed properties using the Council’s online reporting tool. Reports can be made at any time of the day or night, and all complaints are reviewed and investigated in line with our enforcement policy. • There is no requirement for the Council to notify residents/neighbours of an application for a HMO licence application and it should be noted that resident comments and feedback do not form part of the licensing |

| | | |
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| | <p>Resident engagement: Consult neighbours before granting/renewing licences; provide direct contact routes to landlords/managers and the council team.</p> <p>Monitoring & reporting: Publish ward level counts, enforcement stats, and trends.</p> <p>24-hour helpline and online reporting portal for complaints.</p> <p>Feedback loops to ensure residents' concerns are acted upon.</p> | <p>process. The Planning requirements for HMO's under the Article 4 Directive will include consultation with residents and comments made will form part of the planning considerations.</p> <ul style="list-style-type: none"> The Council will publish data and licence registers in line with its statutory responsibilities under the Housing Act. |
| <p>8 Occupancy, standards and property conditions</p> | <p>Occupancy caps aligned to size/amenities; no ad hoc "hot bedding."</p> <p>Routine checks on fire safety, damp/mould, kitchens added upstairs, electrical/gas safety (noting some feel existing Gas Safe/EICR should suffice).</p> <p>External standards (gardens, boundaries, facades) to be explicitly enforced.</p> <p>Suggestions for permit limits per HMO/room, mandatory on plot parking plans, and penalties for highway obstruction.</p> | <ul style="list-style-type: none"> The Council recognises the concerns raised regarding occupancy levels and the prevention of practices such as "hot bedding." The Council is already empowered under the Housing Act 2004 to set occupancy caps linked to room sizes, amenity provision, fire safety and HHSRS considerations. These standards ensure that occupancy levels remain safe, proportionate and evidence-based. The Council is not permitted to impose arbitrary caps beyond these statutory criteria, but it will continue to assess each property to determine the maximum number of occupants that can be safely accommodated. The Council acknowledges requests for routine checks on fire safety, damp and mould, electrical and gas safety, and the regulation of additional kitchens or facilities installed on upper floors. The Council already has powers to address these issues through licensing conditions, the HMO Management Regulations 2006, HHSRS inspections, and existing statutory safety requirements including Gas Safe certification and Electrical Installation Condition Reports. The Council considers the existing inspection framework sufficient, and additional licensing will reinforce compliance with these essential safety standards. The Council notes the calls for stronger enforcement of external property standards, including gardens, boundaries and building facades. The Council |

is able to address external disrepair, waste accumulation and hazards through HMO licence conditions, the HMO Management Regulations 2006 and existing environmental health legislation. However, the Council is not permitted to set conditions requiring an HMO to match the aesthetic standards of neighbouring private dwellings, such as landscaped gardens or decorative features, as this would exceed the scope of licensing powers. The Council's remit is limited to ensuring that external areas are free from significant hazards, maintained in a safe and hygienic condition and managed in accordance with statutory expectations. As part of the scheme, the Council will continue to emphasise the importance of maintaining external areas to an acceptable standard in order to safeguard local amenity, without imposing aesthetic requirements that fall outside the legal purpose of property licensing.

- The Council has considered the suggestion that HMOs should be subject to parking permit limits or mandatory on-plot parking plans, with penalties for highway obstruction. The Council must operate within the limits of licensing powers, which do not extend to controlling public highway use or determining parking allocations beyond measures linked to property management. The Council can, however, require landlords to provide tenants with clear guidance on local parking arrangements and waste collection rules, and to take reasonable steps where parking-related complaints arise. Regulation of the public highway remains the responsibility of the relevant highways and parking services.
- Overall, the Council will continue to apply conditions that are fair, proportionate and enforceable. Conditions must relate to the safe occupation and effective management of the property. The Council cannot impose obligations that fall outside the statutory purpose of the licensing regime or that require landlords to control matters beyond their reasonable influence. This approach ensures that property standards are raised while maintaining a lawful and balanced application of additional licensing powers.

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| <p>9 Alternative measures</p> | <p>Ideas include higher council tax for HMOs, business rates for landlords, and reinvestment of fees into affected communities.</p> <p>A notable strand prefers targeted/selective licensing in problem hotspots rather than borough-wide measures; others support borough-wide but resourced to be effective.</p> | <ul style="list-style-type: none"> • The Council does not have powers to attach higher rates of Council Tax or Business Rates to HMO's as these are legislated and rated via national systems. Licence fees will cover the costs of the administration and enforcement of the scheme. • The scheme has been proposed to apply to the whole borough. This is because of compelling data from the Housing Tenure Survey showing concerns across all data sets in every ward. If the Council were to apply the scheme to only certain wards, it would create an inconsistent scheme of regulation and could see the displacement of problem HMO's to wards where the scheme does not apply. Therefore, the Council is committed to introducing the scheme across the whole borough. |
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| Individual Response from Cllr Douglas Mills, Ward Councillor for Ruislip Manor | | |
|---|---|---|
| <p>Fee Structure & Discounts</p> | <p>To encourage landlords to make more use of 'professional' letting agents we grant a 50% discount on the proposed fee. Using such agents, (properly registered with appropriate letting/managing agent bodies) makes it easier to</p> <ol style="list-style-type: none"> 1. Know who to contact 2. Names of actual tenants, who will have been confirmed as legal to have a tenancy 3. Discuss issues quickly 4. Achieve mitigation or enforce as required <p>By my maths, at £1,401 x 'hidden' HMOs we expect around £2.6m to cover a 5 year cycle. As take up will be lower, suggest fee should be £1,550, not that out of line with other Outer London Councils. Makes the 50% above discount a serious offer.</p> | <ul style="list-style-type: none"> • The Council believes it fair and proportionate to offer a financial incentive to landlords who demonstrate good management practices and good compliance. It was proposed to introduce a discount of £50 for accredited/registered landlords, however consultation has indicated that this would not be a large enough incentive for Landlords to seek accreditation. It is proposed in the fee schedule to increase this discount to 10%, representing a monetary discount of £140.10 on the fee of £1401. • The housing tenure survey has indicated that the number of HMO's which would fall under this scheme is nearer to 1000 resulting in income of £1.4million which will cover the administration, enforcement and compliance activity of the scheme over 5 years. • The fees have been calculated in accordance with the principles set out in the Housing Act 2004, ensuring that they are cost neutral. This means that the fee structure is designed solely to recover the costs of establishing, administering and enforcing the scheme. The Council is not allowed to generate a surplus or create income to subsidise other Council services. The cost of inspections and enforcement has been built into the proposed fee. |

| Individual Response from Safeagent | | |
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| Evidence base | <ul style="list-style-type: none"> • Noted significant variation on the data for ward level Category 1 hazards within HMO's, noting the highest levels in Belmore and lowest in Harefield Village and Ruislip Manor. • Noted the lack of clarity about data in relation to 'hidden HMO's' • Suggests that the evidence base does not justify a borough wide Additional Licensing scheme and that the scheme should be more targeted in problem areas. | <ul style="list-style-type: none"> • It is noted that there are varying differences in the data between wards, however concerns are present across all data sets for every ward. • To clarify, the figure provided for 'hidden HMO's' applies to all HMO's. Further modelling has suggested that there could be approx 1100 properties which would fall in scope of Additional Licensing. • The scheme has been proposed to apply to the whole borough. This is because of compelling data from the Housing Tenure Survey showing concerns across all data sets in every ward. If the Council were to apply the scheme to only certain wards, it would create an inconsistent scheme of regulation and could see the displacement of problem HMO's to wards where the scheme does not apply. Therefore, the Council is committed to introducing the scheme across the whole borough. |
| Licence fees | <ul style="list-style-type: none"> • Concerns about the financial burden on landlords • Queries the fee calculation process • Challenges the proposed discount of £50 for registered landlords and recommends a discount of 20% to encourage meaningful incentive • Requests clarification on accreditation discounts for agents, not just landlords. | <ul style="list-style-type: none"> • The fees have been calculated in accordance with the principles set out in the Housing Act 2004, ensuring that they are cost neutral. This means that the fee structure is designed solely to recover the costs of establishing, administering and enforcing the scheme. The Council is not allowed to generate a surplus or create income to subsidise other Council services. The cost of inspections and enforcement has been built into the proposed fee. • The Council could opt to provide a different fee structure and an instalment system for licence fees, however, the Council has avoided overly complex fee structures and payment systems. Such complexity will require additional resources to manage and would ultimately lead to higher fees for applications. • The Council believes it fair and proportionate to offer a financial incentive to landlords who demonstrate good management practices and good compliance. It was proposed to introduce a discount of £50 for accredited/registered landlords, however consultation has indicated that this would not be a large enough incentive for Landlords to seek accreditation. It is proposed in the fee schedule to increase this discount to 10%, representing a monetary discount of £140.10 on the fee of £1401. • We have amended discounts to include Accredited Landlord or Agent. The discount is offered if they act as the licence holder or designated manager of a licensed HMO |

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| | | <ul style="list-style-type: none"> The Council believes that the proposed fee of £1401 represents good value for money over the 5 year licence period and should be a manageable cost for maintaining high standards of property management. |
| Licence conditions | <p>Suggests re-working/clarification on the below conditions</p> <ul style="list-style-type: none"> Condition 2 – Amenity & Spaces – suggest deletion Condition 4 – Tenant references – suggest rewording to accommodate vulnerable groups Condition 6 – Complaints procedure – requests clarity Condition 7/7a – Suggests that this condition is excessive and suggests review Condition 13(c) – smoking signs – Suggests deletion as covered by primary legislation Condition 14 – External areas – Suggests clarification on responsibility external maintenance for blocks of flats Condition 17 – Compliance works – clarity needed Condition 27 – Fire safety – Queries the application of LACORS guidance Condition 31 – Absence of licence holder – amendment needed for managed properties Condition 33 – training – Awareness of training provisions Condition 34 – Display of documents - Review | <ul style="list-style-type: none"> Condition 2: comment accepted. Revised version: The licence holder must ensure that the number of occupiers permitted in the HMO is appropriate having regard to the amenities, facilities, size and layout of the property as determined by the Authority at the time of licensing. This condition supplements mandatory national minimum room size requirements and the Council’s published Amenity & Space Standards. Condition 4: comment accepted. Revised version: The licence holder must take reasonable steps to obtain references or other suitable information before granting a tenancy. Referencing must be applied fairly and must not exclude applicants who may be unable to provide conventional references, including those moving on from homelessness, prison leavers, people granted asylum or individuals fleeing domestic abuse. Where standard references are not available, the licence holder must consider appropriate alternatives, such as information provided by a previous accommodation provider, support service or relevant professional. For the purposes of this condition, a “satisfactory reference” means reasonable evidence that the applicant can engage with the tenancy agreement. Referencing processes must be carried out in a non-discriminatory manner and in accordance with the Equality Act 2010 and Right to Rent requirements. Condition 6 comment accepted. Revised version: The licence holder must provide occupiers with clear written information, such as a complaints or reporting procedure, setting out how to report repairs, property condition issues or management concerns, including acknowledgement and response times. Where a national landlord |

redress scheme applies, details of the relevant scheme must also be provided to occupiers.

- **Condition 7/7a – comment accepted. Revised version:**

Condition 7 – Anti-social Behaviour

The licence holder must take reasonable and proportionate steps to prevent and address anti-social behaviour associated with the property, including investigating complaints, keeping appropriate records and cooperating with the Council, Police or other relevant agencies where necessary.

7a – Prevention

The licence holder must ensure that occupiers are made aware of their responsibilities regarding noise, waste management and anti-social behaviour, and that tenancy agreements include appropriate behavioural clauses. Referencing processes must be fair and must not require disclosure of criminal convictions or other sensitive personal data. Property inspections must take place at reasonable intervals, typically every six months, unless more frequent visits are justified due to previous management concerns or as directed by the Authority.

7b – Action

Where the licence holder becomes aware of alleged anti-social behaviour, they must take reasonable steps to investigate, communicate with the occupiers involved, and where necessary, engage with the Council, Police or other relevant agencies. The licence holder must keep written records of any actions taken.

- **Condition 13(c) comment accepted. Revised version:**

The Licence Holder must ensure that:

- a. The common parts and areas in the premises are kept free from obstruction, in a clean condition and in good order and repair.

b. Common areas, including shared living rooms, kitchens, and hallways are not used for sleeping by tenants or their guests.

c. Where required by the Health Act 2006 and associated regulations, smoking is not permitted in any smokefree common area and at least one legible no smoking sign must be displayed in such areas.

For the purposes of this condition “common parts” means—

(i) the entrance door to the HMO and the entrance doors leading to each unit of living accommodation within the HMO; and

(ii) all such parts of the HMO as comprise staircases, lifts, passageways, corridors, halls, lobbies, entrances, balconies, porches and steps that are used by the occupiers of the units of living accommodation within the HMO to gain access to the entrance doors of their respective unit of living accommodation.

- **Condition 14 comment accepted. Revised version:**

The licence holder must take reasonable steps to ensure that external areas under their control are kept clean, safe and free from disrepair. Where the exterior of the building or communal grounds fall under the responsibility of a freeholder, managing agent or other third party, the licence holder must take reasonable steps to report any defects or issues to the responsible party and, where appropriate, request that necessary works are undertaken

- **Condition 17 comment accepted. Revised version:**

Where the Authority identifies works necessary to ensure compliance with this licence or with statutory housing standards, the licence holder must complete such works within the reasonable timescale specified in writing by the Authority.

- **Condition 27 – comment accepted. Revised version:**

The licence holder must ensure that appropriate fire safety measures are provided, maintained and kept up to date in accordance with current fire safety legislation, including the Regulatory Reform (Fire Safety) Order

2005 (where applicable), the Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022, and relevant British Standards as amended.

When determining appropriate fire precautions, the licence holder should have regard to recognised national fire safety guidance, including the LACORS “Housing – Fire Safety” guidance or any subsequent guidance issued by the Government or fire authorities.

Fire safety measures must be reviewed and updated as necessary to reflect any changes in legislation or recognised guidance during the term of the licence.

- **Condition 31 comment accepted. Revised version:**

Absence of the Licence Holder

Where the property is managed by a competent managing agent identified in the licence, this condition does not apply.

Where no managing agent is appointed, the licence holder must ensure that suitable arrangements are in place for the effective management of the HMO during any period of their absence. These arrangements must include providing occupiers with up to date contact details for the person responsible during such periods, and displaying these details in a prominent position within a common area, preferably near the entrance door.

Where the licence holder appoints a person to manage the HMO during any period of absence, they must:

- a. obtain from that person a signed declaration confirming that they understand the licence conditions by which they are bound and the consequences of failing to comply; and
- b. provide the Council with a copy of the signed declaration within 14 days of the change of circumstances.

- **Condition 33 Not applicable.**

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| | | <ul style="list-style-type: none"> • Condition 34 comment accepted. Revised version: The following documents must be displayed in a prominent position within a common area of the HMO: <ul style="list-style-type: none"> a. a copy of the current HMO licence; b. the name, address and telephone number of the licence holder or managing agent, including emergency contact details; c. a copy of the current Gas Safety Certificate (where applicable); and d. a copy of the Energy Performance Certificate. <p>These documents must be kept up to date at all times.</p> |
| Delivering effective enforcement | <ul style="list-style-type: none"> • Stresses the need for a well-resourced enforcement team to ensure fairness. • Warns that without enforcement, compliant agents bear disproportionate burdens. | <ul style="list-style-type: none"> • All noted and agreed |
| Recognised role and regulation of lettings agents | <ul style="list-style-type: none"> • Encourages the council to engage with and support regulated letting agents. • Highlights existing legal obligations for agents and Safeagent's enforcement toolkit. | <ul style="list-style-type: none"> • All noted and agreed |
| Individual Response from Property Mark | | |
| Proposed licensed area | <ul style="list-style-type: none"> • Suggests that the proposed borough wide Additional Licensing scheme will create confusion and that the scheme should be more targeted in problem areas. | <ul style="list-style-type: none"> • The scheme has been proposed to apply to the whole borough. This is because of compelling data from the Housing Tenure Survey showing concerns across all data sets in every ward. If the Council were to apply the scheme to only certain wards, it would create an inconsistent scheme of regulation and could see the displacement of problem HMO's to wards where the scheme does not apply. Therefore, the Council is committed to introducing the scheme across the whole borough. |
| Fees | <ul style="list-style-type: none"> • Concerns that the Council have not published data of a previous selective licensing scheme to evidence impact • Concerns about the financial impact on landlords • Requests clarification on accreditation discounts for agents, not just landlords. | <ul style="list-style-type: none"> • The Council has never implemented Selective Licensing and therefore cannot provide any data. • The fees have been calculated in accordance with the principles set out in the Housing Act 2004, ensuring that they are cost neutral. This means that the fee structure is designed solely to recover the costs of establishing, administering and enforcing the scheme. The Council is not allowed to |

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| | | <p>generate a surplus or create income to subsidise other Council services. The cost of inspections and enforcement has been built into the proposed fee.</p> <ul style="list-style-type: none"> • The Council could opt to provide a different fee structure and an instalment system for licence fees, however, the Council has avoided overly complex fee structures and payment systems. Such complexity will require additional resources to manage and would ultimately lead to higher fees for applications. • The Council believes it fair and proportionate to offer a financial incentive to landlords who demonstrate good management practices and good compliance. It was proposed to introduce a discount of £50 for accredited/registered landlords, however consultation has indicated that this would not be a large enough incentive for Landlords to seek accreditation. It is proposed in the fee schedule to increase this discount to 10%, representing a monetary discount of £140.10 on the fee of £1401. • We have amended discounts to include Accredited Landlord or Agent. The discount is offered if they act as the licence holder or designated manager of a licensed HMO • The Council believes that the proposed fee of £1401 represents good value for money over the 5 year licence period and should be a manageable cost for maintaining high standards of property management. |
| Engagement | <ul style="list-style-type: none"> • Encourages the Council to implement robust processes and opportunities to engage with landlords and managing agents to promote better education and compliance with standards. • Suggests that the Council should actively encourage registration with professional bodies • Suggests a programme of training opportunities and landlord forums | <ul style="list-style-type: none"> • It is the Councils intention to create better opportunities for engagement with landlords along with training and regular industry forums. These will be programmed as the resourcing and expansion of the Private Sector Housing team takes place. |
| ASB & Enviro-crime | <ul style="list-style-type: none"> • Recommends a multi-agency partnership approach to tackle ASB rather than relying on landlords to manage it. | <ul style="list-style-type: none"> • The Additional Licensing scheme provides the Council with additional powers to tackle the impacts of HMO's on communities. This is done through compliance with licence conditions and enforcement actions where necessary. |

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| | | <ul style="list-style-type: none"> • The Additional Licensing scheme forms part of the Councils overall capabilities to deal with anti-social behaviour and enviro-crime. The Council has a coordinated approach to tackling anti-social behaviour and ensures that cases and information is shared between teams to work on response solutions. • Licences will provide a system of regulation where checks on properties and checks on landlords will form part of the licensing process. • The Council believes it is appropriate to place some responsibility on landlords to play their part on managing community impacts caused by their tenants. |
| If Scheme is approved | <ul style="list-style-type: none"> • The Council should provide annual summaries of outcomes to demonstrate the impact of Additional Licensing. This would ensure transparency for stakeholders | <ul style="list-style-type: none"> • The Council will provide periodic updates and reports to demonstrate the effectiveness of the scheme. |

| Who responded | Number of responses | Do you agree with the proposed scheme? | Do you agree with the mandatory conditions? | Do you agree with the proposed fees? |
|--|---------------------|--|---|--------------------------------------|
| Landlords, managing agent or letting agents | 25 | Yes - 13 | Yes - 15 | Yes - 7 |
| Private rented sector tenants (PRS) | 26 | Yes – 16 | Yes - 17 | Yes - 14 |
| Council or housing association residents | 60 | Yes – 33 | Yes - 31 | Yes - 25 |
| Residents living next to or near an existing HMO | 407 | Yes – 350 | Yes - 322 | Yes - 252 |

Feedback from Landlords

“I just want to let out my property to good people who pay on time. Already things in place so they can complain if I do not comply”

“Existing licensing scheme is 5 years, if the council needs additional information from the landlords - it should amend the existing licensing and not complicate matters by adding to it”

“If you really want to do it, make it convenient, cheaper and quicker.”

“I don't believe this will make bad landlords register just the good ones who will then sell up making the housing issues even worse.”

“LL are under a lot of pressure due to renters right act , removal of section 21, additional tax, if you want to drive out all small landlords and allow the large Black rock faceless corporates to take over the UK and drive house prices up even further, then please go ahead.”

“Extra costs for me that I do not have.”

Feedback from PRS tenants

“Normal people have no chance of saving, and eventually this will extend to not even being able to rent in the borough due to landlords being able to charge extortionate amounts because they'd rather rent out each room.”

“A lot more checks to make sure they are being kept legal and run properly and turn up unexpectedly don't make an appointment, you can tell when they know someone is coming, things get moved made better etc and then it all goes back as before after visit”

“make it £500 and you will see landlords more willing to licence”

Feedback from residents living next to or near an existing HMO

“Make it a legal requirement for landlords to gain planning permission if they are buying a house to turn it into an HMO. To enable neighbours to have their say on how it will impact their lives by living next to an HMO and how that will affect the resale for their property in the future”

“Limits to the number of people in one premises, keeping it appropriate to that dwelling.”

“Set a number of ASB or criminal offences allowed in any one HMO. If the number of offences is reached close the HMO.”

“Control number of HMO's in same streets/areas which disrupts streets through ASB, Vehicle parking, disrespect to existing residents. Regularly checking HMO properties and building works for unapproved changes. Rubbish/fly tipping being left outside HMO properties kerbside and front gardens, there's no one in HMO's who wants to take ownership - adjacent properties to have contact information for the license owner to report instances direct.”

“We have families that need houses not just one room in an adapted house. Be more scrupulous on who is living in these HMO's in residential roads.”

“These family homes should be for families.”

Feedback from council of housing association residents

“It's not the licence it's how stringent the checks are on the tenants”

“I don't believe expanding licensing will solve the problems with poorly managed HMOs. The Council already has the powers to deal with unsafe or badly run properties and should focus on enforcing the existing rules instead of creating more fees and bureaucracy. This scheme is likely to increase costs for good landlords, which will be passed on to tenants, without guaranteeing any real improvement for residents.”

“My road has at least 12 there is no parking the litter and rubbish is overwhelming they use bikes and mopeds to work and there's always noise it's a nightmare”

“I have seen people without registered or qualified electricians and gas people. install things in the home just because they want them.”

“More robust checks and planning permissions. And more robust vetting of tenants. More robust checks to ensure no over-occupancy”

“The council should consider targeted enforcement measures rather than borough-wide additional licensing. Focusing on problem areas and limiting further HMO development in streets already saturated with HMOs would be a more effective approach.”