

Proposed Additional Licensing Scheme and Selective Licensing Scheme Consultation Responses Only

October 2017

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Introduction

This document reports on the responses to the consultation on the council's proposals to introduce a citywide Additional Licensing Scheme and a Selective Licensing Scheme in 12 wards of the city. The consultation took place over a period of 12 weeks during the summer and ended at midnight on Sunday 10 September 2017.

The council consulted with local residents, including tenants, landlords, managing agents, key interested parties (i.e. Landlord Groups, Police, Fire Service, Universities) and other members of the community including business owners and voluntary and community groups who live or operate businesses or provide services within the areas of the proposed designations. Consultation also took place in the surrounding areas (with Lewes, Eastbourne, Mid Sussex and Adur & Worthing councils) that may be affected by the introduction of the proposed schemes.

This consultation consisted of an online survey available on the council's website and available as a printed version at council public offices and the city's libraries. The survey was accompanied by an information booklet on the proposed scheme, frequently asked questions and a copy of the draft conditions.

Printed information was made available in the form of posters displayed in libraries and other public locations in the local authority's area. Postcards publicising the consultation were sent to a sample of 3,000 residents in the proposed and surrounding areas. The council also commissioned a door knocking exercise, in line with similar exercises completed in 2012 and 2015 at a sample 1,000 properties. Information relating to the consultation was circulated by email to current HMO licence holders, letting/managing agents, key interested parties, neighbouring authorities and voluntary and community groups. Officers and members also met with the local Landlords' Association and attended Local Action Group meetings.

The council publicised the consultation via press releases and social media, with an advert placed in the local online paper Brighton & Hove News throughout August 2017. News items were also placed on the council's website.

The responses to the questionnaires have been separated into nine categories

- Home owner
- Private rented tenant in Brighton & Hove
- Social housing tenant in Brighton & Hove
- Live in a shared home or HMO
- Letting/ managing agent
- Landlord of property in Brighton & Hove
- Local business
- Other
- Not stated

The responses have also been coded by bullet point to identify those responses received via the consultation portal and those via the door-to-door survey as follows:

- Consultation Portal response
- ❖ Door-to-Door survey response

In addition responses to the proposed **Selective Licensing Scheme** have also been split between people living in the 12 wards where the proposed scheme could be introduced and people living in other areas of the city or outside of the city

Before publishing the responses, we have removed any inflammatory or inappropriate comments whilst keeping the essence of the response. We have also removed duplicate responses there it has been identified that a respondent has repeated the same comment word for word

Response to the Consultation

Response to the Questionnaires

Additional licensing Scheme: A total of 785 responses were received during the 12 week consultation period:

- Consultation Portal: A total of 285 responses were received via the council consultation portal over the consultation period.
- Door-to-Door Survey: A total of 500 people across the city were interviewed by an external agency commissioned by the council during the consultation period.

Selective Licensing Scheme: A total of 793 responses were received during the 12 week consultation period:

- Consultation Portal: A total of 293 responses were received via the council consultation portal over the consultation period.
- Door-to-Door Survey: A total of 500 people across the city were interviewed by an external agency commissioned by the council during the consultation period.

Other Responses

A total of 11 emails were received during the 12 week consultation period via a dedicated mailbox PrsLicensingConsultation@brighton-hove.gov.uk.

Additional Licensing Scheme: Findings from the Questionnaires

A total of 785 responses to the questionnaire were received during the 12 week consultation period.

2b. In the past 12 months, in your local area have there been any other issues associated with HMOs and flats within HMOs?

Home owner

- A frightening number of people staying in the property in addition to what we assume are the 'official' tenants
- A large number of cars and very large white and blue vans with additional private cars which do not look fit for the road. The drivers drive very fast along the road. The drivers have at times blocked driveways, leave vans running for 20 mins unattended. The house is occupied by supposedly 6 people. There seem to be a lot more with maybe as many as 12 vehicles. Cars have been removed by DVLA. The owners remove the tyres and the body of the cars have been left on the road. This has happened twice.
- Additional crime?
- Anti social behaviour and over crowding.
- Anti social behaviour by residents. Fights on the steps, things being thrown from the top floor windows across the street and onto the pavement below, shouting, drinking on the steps, parties outside the sorting office on North Road, begging on the streets by residents, and even door to door begging late at night which is very unsettling.
- Lots of illegal HMO's running and owners lying to the council when they are reported by neighbours Licenced properties being hugely extended under permitted development which look out of character with all the other neighbouring properties. This is so the landlords can put as many people as they can in one property to increase their revenue but with additional people comes additional cars, noise and litter etc. which is causing issues for the local residents
- Badly managed/maintained properties in a conservation area. The odd party, but tenant behaviour has not been a big problem except that HMOs never seem to be given larger bins for more people!
- Car parking - not enough in our area for students who all seem to have cars
- Constant disturbance, drug dealing, anti social behaviour.
- Damage to my property from renovation to HMO next door
- Difficulty in car parking as the houses have multiple people each person with a car, and then they have visitors who also have cars. The houses were originally built as 3 bedroom houses for families, now with so many HMOs we have lost neighbours and that social interaction, community spirit is being eroded. The council has given permission for a house behind me to be increased in size from 3 beds to 7 beds. If a house is semi detached one house of the pair should not be permitted to change its dwelling status. The council does not permit building properties in our gardens unless we build with the other semi detached house owner, it should be the same rule with change of dwelling.
- Drums at all times. Being told to roll over and die
- Family homes being bought by private landlords, noise associated with building works to increase the bedrooms in these homes and when the students move in, noisy parties etc.
- Groups of people visiting - very late night music
- Hanover and Elm Grove has HEGLAT which works with HMOs and the councils. I have found their meetings to be very helpful and their collaboration has mitigated a lot of the historic problems we had with HMOs. However, the density of HMOs in our area is still too high, with streets like Washington Street coming close to 20-25% HMO occupancy
- HMO tenants causing trouble and damage in the street - police were involved.
- Household waste being left out for collection in black sacks instead of bins for collection these

- are torn open by wildlife resulting in smell and rubbish all over the street
- Increased police activity due to drug dealing in one student house.
 - Issues related to unwillingness for some occupants of HMOs being un-cooperative and disinterested in being pleasant and not rude to local residents. That is engaging in ensuring they don't offend homeowners in their manner when in outside areas; such as shouting or kicking balls at fences or walls, just being an irritating nuisance in how children are managed by family members.
 - Lack of accountability of landlords, letting agents and building managers/owners. Problems seem to get lost between these agencies and in my own experience of a privately rented HMO, nothing got done when there were serious problems.
 - Landlords allowing properties to become dilapidated but still charging huge rents
 - Loss of family accommodation. Multiple vehicles parking in small streets. Change to community feel of area.
 - Main issues have been with large groups just for weekends etc.
 - Multiple issues with so called "Party Houses". Causing huge disruption to local residents in Kemptown.
 - My area, North Laine has been blighted by the increase in number of HMOs. We now have 62 in the area and no doubt more which are unlicensed. The growth of Party Houses in particular has impacted negatively on many people's lives. These properties and Airbnb and uber properties have to be included in any future licensing of rented property. Not to do so is a cop out. The interests of residents who live in the city centre have to be considered. For too long the Council have ignored the impact of their decisions on the lives of those living in the centre (particularly in the granting of alcohol licences). HMOs cause noise and disturbance, and rubbish and illegal fly-tipping. Those residents unfortunate enough to live near a party House must dread the coming of each weekend.
 - None x 21
 - No but I think it is important that if you are renting [which I have done in Brighton] it is important that certain basic standards are adhered to.
 - No HMO's in my area
 - No just noise, rubbish and total disrespect of other people
 - Noise, rubbish, leading to lower living standards.
 - Not using recycling arrangements, large scale dumping of furniture etc. usually by communal bins whenever there is a change of tenant.
 - Numbers of cars increased significantly putting unacceptable pressure on resident parking. Appalling state of gardens with hedges growing over the pavement. Illegal HMOs not being dealt with despite repeated complaints, a simple of a relative lives there accepted but not investigated. Therefore 5 tenants in a 3 bedroom house with no landlord checks being carried out.
 - Only moans I have heard are from houses/flats used for holiday lets and Airbnbs. I have personally not had problems although where I live, holiday-makers/renters of holiday lets have not been given the rules of the street, which can (and does) impact on us
 - Parking students both sides of my house 8 cars
 - Part of the issue is that these properties were not built for the number of people now living in them. I don't mind HMOs being built / converted to, and see the need for them, but the landlords should have a duty to convert the property properly and increase the sound insulation to part E standards as part of that.
 - Rubbish and litter left outside rented properties. Poor external appearance of houses in street.
 - Short weekend lets - party houses
 - Small HMOs contain three to four households each with TV, sound systems, computers and, often amplified musical instruments or drums. Neighbours are therefore constantly faced by noise coming from different rooms. House owners are reluctant to complain because they have

to declare any complaints when they sell their own homes.

- Some but not all
- Someone running a catering business from an HMO. Refrigerated vehicles, cables running across pavements, large numbers of vehicle visits day and night.
- The increase in both the number new, and the size of already existing, HMOs has had significant impact on the nature of our small residential area.
- The maintenance of fire safety has alarmed me at times when I discover protected routes blocked or combustible items on them
- There have been no issues in my area with HMOs
- There was a fight in our street
- We moved from Hollingbury Road specifically due to the colonisation of the road by HMO landlords who were buying up properties, converting the lofts without building reg. permission, and letting them on 8 separate tenancies to students at rents of £100 per week each; they then applied retrospectively for HMO planning and building reg. permissions. Noise from late-night or even all-night parties, dirt and mess from rubbish put out too early and inadequately protected from foxes, cats and seagulls, and excessive car-parking from all those multiple tenancies made our lives, and those of some of our neighbours, a misery. The boys next door to us had violent fights and on the last night of their tenancy it sounded as though one of them was being seriously attacked by another. One of our neighbours had to move as she, her husband and their two children hadn't slept properly in a year. We decided to leave shortly after, at huge financial cost as we had completely renovated our house and had to start again.
- Why are Party Houses not included? They are the worst for loud music, parties and rubbish
- Yes, noise pollution
- Yes, there are issues around houses which are let out short-term as Party Houses.
- Yes, yes and yes. You seem to be completely forgetting about the wider issue surrounding the studentification of an area. Our doctor's surgery is closed, the local nursery has closed, and the school is massively undersubscribed which puts it at threat of closure. We have lost the heart of a community because it is full of transient residents instead of families meaning the services that the few remaining families so desperately need are not utilised and then close. Also you fail to mention parking. We have a 3 bed house with 1 car. The 4 bed HMO next door has 4 cars!!! The one on the other side of me has 3 cars.
- Yes. Some are used as party houses which results in a lot of noise. Also, when used for Hen Nights, quite often inappropriate decorations (suitable for Hens but not for children) are placed on front doors and on surrounding street furniture. For those used as student housing, at every change over there are mattresses, old sofas, microwaves, books, and any other unwanted items dumped by the communal bins which is left to residents to clean up.
- Getting appointments at Doctors are also a problem due to more people in area. Houses built as 3 bedrooms and now converted to 5 and 6 bedrooms.
- ❖ Do see discarded furniture, beds, bikes etc. in parts of the City but not here up in Rottingdean.
- ❖ No but do see them when in the City Centre sometimes.
- ❖ Not a problem here but it is in other parts of the City - anti social behaviour that is.
- ❖ Often see dumped bulky waste across the City, beds, mattresses, old furniture, bikes etc.

Private rented tenant in Brighton & Hove

- 99% of student housing here is awful. Covered in mould which is harmful to the body and can cause serious problems later down the line. Outrageous rent prices and is practically falling apart. The houses are being let by private landlords who get away with making as much money from a property without leaving it a safe place for people to live. As well as my fellow students, my friends who are full time working adults experience similar issues, where the rent is extortionate, the landlord getting away with providing outdated facilities in the house, etc.
- Crime

- Empty properties during university breaks; Rodent infestation of adjacent HMO - dispute between HMO agent and our private landlord as to responsibility for remediation (who pays for it)
- Families being priced out of the area due to HMOs sub-dividing already quite small properties and hiking up rents.
- HMO legislation is discriminatory and does nothing to address the very real issues that renters face in our city.
- HMOs negatively affect good tenants, working professionals on lower income wages who want to live in shared accommodation together. I've lived in Brighton for 5 years sharing with the same group of friends for the duration of this time and we operate as a family unit, when we lost our last rented home due to the introduction of HMOs in Queens Park we went through 4 months of utter hell trying to find a place to rent in order to stay together. I'll repeat: we are good, responsible tenants and our current and past private landlords are also good and fair landlords. If HMOs are rolled out to Central Hove we loose our home because there are 4 people, unrelated by blood but living very much as a normal family unit. We pay our bills and rent on time, our home is clean, tidy and we are on excellent terms with our neighbours. We are part of our community and we call our rental property home. My feeling is very much that HMOs are targeted at the difficult situation in Brighton & Hove concerning short-term lets for student housing and all its complexities, (parties, noise complaints, properties in a poor state of repair, rubbish, short term rental periods, etc., etc.) which I do understand and appreciate (I was once a student who lived in hellish private accommodation for 3 years in a different city) but I wish this scheme would consider the large numbers of people, working professionals in the age bracket of 25 - 40 who simply cannot or do not wish to live in a studio flat in Brighton. When we were house hunting as a group we often met landlords who thought it was odd that our group would choose to live together in a house share given our ages and varying occupations. My concern is that if HMOs are rolled out citywide you are going to loose a large number of good, decent properties and private landlords and cause a huge shortfall of 4/5 bed rental properties. This would make it impossible for me to stay in Brighton or Hove; I know it would cause similar issues for about 80% of my social circle. I'm pretty confident this will only increase demand for 1/2 bed rental properties, driving the rental prices up even higher. I really want to continue to live in Brighton, I love this place as do many of my friends but I think the HMO scheme is misguided in many respects, causing decent rental properties, good and responsible private landlords and tenants to loose out.
- Housing not meeting standards that the price would reflect- even remotely. Often illegal without the required fire alarms, locks, and working appliances. The main issue however is response times. Landlords taking weeks, almost a month to respond about a broken shower and similarly about a breaking cooker.
- I am lucky enough to be able to rent privately from a good landlord, but I work at Brighton University and have heard many people saying how difficult it is to find housing which is in habitable condition and an affordable price.
- I have heard of lots of issues of private landlords in Goldsmith Ward e.g. Bad conditions of homes, ill treatment of tenants, evictions, and overcharge on deposits.
- I have no idea.
- Immigration arrests
- Lack of parking spaces and having to pay extortionate amount of money in parking meters, poor building quality of houses means you can hear neighbours having sex, arguments, coughing, yawning, flushing toilet, changing plugs in sockets, all through the walls because they are so thin.
- None x 10
- Not in my ward but plenty of issues across the city.
- Not that I know of x 2
- One of the roles in my job is to help vulnerable clients (homeless and usually with significant

mental health needs) find private rentals. What I have seen especially in the last year and what I am hearing from landlords is studios/HMO type properties are now being let as short term holiday lets. It seems as though landlords are switching to letting properties via Airbnb and similar sites where they get more money and don't have to be so concerned about their tenants needs, and possibly not even needing to let the property out over the winter. I'm not sure if HMO licencing would cover holiday lets? I suspect not and therefore probably wouldn't solve the issues of poor maintenance or ASB which could still continue with holiday letters.

- Property licensed for 8 currently housing 9.
- Rubbish - but this is due to lack of bin storage and communal bins areas, not a fault of the landlord.
- They drive up the rent
- ❖ Bulky rubbish is the nuisance.
- ❖ Bulky waste (furniture, mattresses etc.)
- ❖ Dumped furniture, spilled boxes, drink bottles and cans.
- ❖ Old furniture, bikes, beds etc.
- ❖ Sex workers living downstairs.
- ❖ We moved into a one-bed apartment within a shared building. The ground floor flat is a brothel!

Social housing tenant in Brighton & Hove

- Both neighbouring houses and 3 houses opposite to me are rented out as 'party homes' causing large numbers of people congregating in the street, smoking, drinking and being extremely noisy over the entire weekend.
- Conversion of three bedroom flat to five bedroom student accommodation without planning or landlord consent.
- I don't believe there are HMOs near me.
- Safety of railings
- Social landlord not dealing with homophobic abuse from neighbour and ASB
- The increase in traffic and more vehicles parked on the street
- ❖ Do see litter/dumped items in other parts of the City.

Live in a shared home or HMO

- In my previous experiences and that of friends, HMOs and privately rented properties often have inadequate security protection such as locking windows, proper deadlocks on doors etc. They make it very easy for criminals to break into.
- My landlord currently puts central heating on through months of November to January which is on a timer that is on 2 hours at 5 am 2 hours at 4pm and two hours at 11 pm but still get charged for gas every week in rent
- None x 1
- Not only poorly managed but poorly maintained property
- ❖ Bulky rubbish in area

Letting/ managing agent

- No comments

Landlord of property in Brighton & Hove

- 1) Yes the council has wrongly gone along with VOA office descriptions of non-self contained bedsits without showers or WCs and the Brighton & Hove council is outrageously taxing these as Band A council tax. Outrageously unethical! Totally dishonest. 2) Plus the council has refused to allow landlords to convert archaic bedsits into family units. 3) Plus the planning department charge over £550 now to speak to a planning officer (minimum). 4) How does this assist good provision of housing stock?

- Don't know
- HMOs are not provided with enough proper bins. They are affective large children living in properties and they are not given guidance about how to keep the properties properly. Hands off landlords don't care and so us locals have to step over rubbish and deal with the consequences e.g. rats/bad appearance.
- Issues that party houses are not under the HMO regulations or any other apart from the regulations regarding environmental detriment. There should be regulations controlling party houses and also Airbnb which could likewise be party houses for those coming to Brighton for Hen and Stag parties and the like where the sole reason is to party and get drunk.
- Many. BHCC profligate spending on revolting, soiled, grimy, "licensed HMO" B&B bedsits in the form of "temporary, emergency, accommodation". Defecation in the street, antisocial behaviour, stabbing, arson, drug dealing, abuse, innumerate emergency services visits - fire engines where there is no fire, police almost daily, ambulances, when substance abusers think they have overdosed or get bored. The HMOs are lucratively sponsored by BHCC and other councils who use them for 'out-of-area' placements, yet despite all the evidence BHCC refuses to act to ensure the safety and well-being of the surrounding community. BHCC actively contributes to the demise of a maligned, ignored and neglected community through its failure to act to ensure existing HMOs is sponsors are reformed.
- Most of the rubbish on the street comes from tenants of Council owned property who feel they can leave anything on the street and someone else will deal with it - even old beds!!! My tenants know when to put the bins out and recover them. One of the biggest issues is the really poor quality recycling scheme run by BHCC which often results in paper and card etc. blowing around the street. Just look at the one-bin-takes-all recycling scheme run by Mid Sussex which is an infinitely better arrangement.
- None x 28
- No issues at all. I have no idea of the occupancy of properties in this area so cannot comment but all look well maintained. Communal bins have been a good improvement.
- No, I am a landlord and always make sure I look after my property and my tenants properly, fixing any issues immediately and being considerate of the neighbours.
- None that I'm aware of. Regarding the litter question above - litter is a problem all over the city - not just with HMO type housing. It's everywhere!!!!
- Not in my area, but I am aware of major issues in other areas such as Moulsecoomb and Hanover.
- Party house - Stag and hen houses can cause issues - These are also commercial business properties and should pay commercial rates, they should be subject to sound tests and proper L2 fire alarms systems
- Poor management. A certain landlord/managing agent always springs to mind.
- The only issue has been the council's lack of clarity on this issue and no definitive register.
- There are issues around HMOs, but I feel that the assumption that all issues can be related to the HMOs in any given area is too much of a simplification.
- There has been a huge increase in HMOs in the area, which was formally a quiet residential area, proud of its community spirit and environment. The terraced houses here are small, yet planning permission has been granted (or illegally converted and retrospective planning applied for) for chopping up these 2 bedroom houses into 5-7 bed HMOs. The implication has been increased noise, antisocial behaviour, strain on parking and refuse issues, with rubbish strewn across the street. There have been a number of these in a small area.
- Think the council should do additional rubbish collections for houses with no front garden bin storage
- We have HMOs but if managed correctly they do not create an issue. Given the paucity of property available and the fact that this is a busy city, sharers must form part of city life.
- Yes. The 2nd and 3rd floor flat is registered under HMO. The tenants of the ground floor flat,

which we do not own, repeatedly leave bulky items in the entrance hall and do not respond to requests to keep it clear. This is the principal fire escape route.

Local business

- Energy performance of flats and damp conditions
- ❖ The odd mattress appears.

Other

- For reference, the last property I rented in Brighton was until September last year in the Elm Grove area - not an HMO, but a single rented flat.
- I am not aware of any near me
- Insufficient on or off street parking provision for bicycles by BHCC causing congested pavements - Racks for Boris Bikes, but not nearly enough for local residents
- None. I'm answering here as an individual. I'm aware of issues which others in the North Laine have raised.

Not stated

- The main issue is the increase in bureaucracy and cost of renting out a property - the amount of work that was required and certification almost led me to sell the property. I may sell if this continues as it seems you will be wanting an additional registration fee - I see no improvement in the properties in my area despite the licencing scheme which has been in effect for the past 5 years. I do see increasing rents as landlords pass on their cost to tenants and an extreme shortage of properties. This is not the solution to low standard housing -and is insulting to private landlords like myself who maintain properties to a high a standard and have good relationships with our tenants.

3b. Please provide any additional comments, including any comments you have on the proposed conditions themselves.

Home owner

- 1. I was not sure the document addressed sufficiently fire safety arrangements, alarms - including for carbon monoxide, electric equipment safety checks. There appeared to be a section missing on p11. 2. The conditions concerning ratio of people to bathrooms and toilets is absolutely minimum and does not seem to take account of male/female mix of tenants.
- Although I'm not directly affected by poorly managed/lived in HMOs I am aware it is an issue for other residents so support the extension of this scheme
- Anti-Social Behaviour. Will not stop them coming home at 4 in the morning doors banging etc. load music during the day.
- Cannot believe that such measures are not already in force. As one who remembers Rachman, measures should be taken that such practices are not applicable in 2017.
- Conditions need to be tightened up on student accommodation numbers and 'party houses'
- Depends on the enforcement and how well this is managed and implemented.
- Every HMO should be licensed and charged an annual fee to offset the additional costs which are being met by council taxpayers and to regain some of the council tax lost to student HMOs
- Generally landlords in this area are good and already comply with the regulations, it is the odd few who cause the problem and I do not think that a general increase in licencing will improve this. The Council need to get out there and inspect all rental properties and penalise the landlords who are not complying. Otherwise this is just a money making scam
- Having a license will not make a difference at all. All that will happen is that the rent will have to increase greatly to cover this additional excessive cost, and the only people who gain from this will be the council.
- Hold landlords more accountable for the actions of their tenants. Insist that in the HMOs that

have expired in November have to reapply for a new license.

- I am more concerned with making landlords provide a decent standard of property for rent than I am with tenants' behaviour. Too often landlords exploit private tenants by charging huge rents for substandard properties.
- I am worried that it removes the ability of friends to rent together as we did when we were young. Houses will be considered HMOs unless they are rented by a family which seems to distort the system for single people
- I believe a tough system of licensing, planning regulations and fire risk should be applied. Especially for rental party houses in Kemptown. Responsibility for bad tenant behaviour should be passed from tenant to landlord given the short term nature of these lets. Tenants change every weekend. Therefore the Council could impose draconian fines direct to the landlord for antisocial behaviour.
- I believe that priority needs to be given to safety, space allowances, decent living conditions and security of tenure.
- I can't see any proposal to limit the numbers of HMOs in a given area. This is needed. Also at the end of a period a HMO license should finish and the house come back onto the market for rental to a family.
- I don't think it will encourage people to rent out small HMOs if all these regulations are enforced. I think furniture and furnishings should not be an issue at all - take it or leave it or replace with your own. You have to bear in mind that people rent places for what they see and like - there is no forcing anyone to live somewhere and if they don't like it after a while they should leave. As to gas, energy safety - all homes have to have a Corgi certificate of safety of gas - or similar. Shouldn't be any different if you are renting out a place in an HMO. I do think they should all have key meters - pay as you go and no surprise or unpaid bills at the end of the tenancy. The only important issue, I think, is Tackling Anti-Social behaviour. The laws should be to be able to get rid of those that infringe them pretty quickly. This applies to noise too!
- I fail to understand why the council feels it needs more control over HMO as there is sufficient legislation to cover problems, which the council does not appear to use currently.
- I have found to my cost that your licence limitations have cost me. The conditions are obviously admirable in concept. My property has reached them. I worked hard to achieve a high standard of which I am proud. However, although covered by a Headlease HMO, I am still bullied by this council. I am shocked by the lack of communication within this council. When I, as a landlord, ask for advice by email, I get no replies.
- I have rented a room in my well maintained home. I also rent another room to students, through Airbnb. I only earn a modest amount. I cannot be compared to scruffy, poorly maintained student houses. Licencing will prevent me from letting out two rooms as I won't make any money
- I have seen a fully compliant licensed HMO where the electricity supply and circuitry was so bad I had to get on to the landlord and make him sort it out otherwise I would have reported him. It was clear that the electric supply cannot have been properly inspected at the time of issuing the licence.
- I know from others' experience that if the Council backs them up they can succeed in identifying illegal or poorly-managed HMOs and get them shut down or the conditions improved. I know the Council is under pressure from budget and staff cuts, but the proposed scheme, which I note you have costed, should enable you to employ sufficient staff to enforce the proposed conditions.
- I think any charges to landlords will be passed directly onto tenants.
- I think tenants deserve a much improved quality of housing and to often people who rent out property are not thinking of the long term / quality of life of their tenants.
- I think the council needs to add the houses which are small HMOs, pre 2013, to the additional list so there is an accurate list and these tenants can be included and benefit from the standards.
- I think the council should focus on the bad properties and bad landlords and prosecuting

them/confiscating their properties. This would finance improvements in other areas as would a citywide additional licencing scheme. A citywide additional licencing scheme would need to incorporate lesser yearly fees to enable yearly visits to finance yearly re-inspections to ensure each property remains compliant as an HMO. Just because a property passes one year is no guarantee it will pass the following year and even good landlords and agents can soon become complacent. With proper management the council could apply to government for HMOs they have approved to be counted as additional housing provision under their local housing target, being as the majority of under-35s cannot afford to get on the housing ladder in any case. More effective collection of council tax from professional HMOs and central government council tax rebates from student HMO's needed. The council should exempt both universities from article 4 unless a shared house/mini hall under their scheme leaves the scheme and requires an HMO licence for ongoing private lets (both universities have excellent managed housing schemes of fewer than 100 properties each, and possess greater jurisdiction over their tenants, who are their students as well as tenants.) The city council needs to regulate Airbnb's/tax them.

- I think the proposed standards are good, and I will be glad to see these improvements for the people living in HMOs. However as said I would like to see sound insulation levels taken into account.
- I welcome the licensing of private rented housing in the City centre, to improve standards for the benefit of tenants and local residents. But in the last few years there has been a big increase in unregulated holiday lettings through web sites like Airbnb. The Environmental Health Department say HMO licensing legislation does not cover holiday properties as the length of stay of the occupiers is not long enough to qualify as a primary residence. But some landlords now let for long periods through holiday websites to avoid private sector regulation. For example, in my street there are four terraced houses let through holiday websites. The house next door is let through Airbnb.com by the owner who lives in South Africa with only a cleaner supervising the property; these houses have been let to students for periods of three months. In London, holiday lets over 90 days a year require planning permission. I suggest Brighton & Hove City Council ask Government for this 90 day planning limit so that longer periods are covered by the proposed new licences.
- I welcome these for the good of everyone including the renters.
- I wish there could be additional requirements on landlords for non HMO properties
- If it can be enforced
- If rigorously enforced and with severe penalties for breaking conditions. Would be useful to apply to other smaller rental properties, large flats (e.g. not over 2 storeys) and those occupied by families (so landlords could not avoid meeting licencing conditions by renting to families rather than friends).
- If you actually have the man power to enforce these????!!!!
- In order for there to be a response, there needs to be a problem. There is anecdote but I have not personally experienced any problems.
- In particular Tenancy Management and Utility supplies
- In principle, the proposals are a very good thing, but they depend on the council having the resources to enforce them and take action when landlords fail to meet them. They also depend on tenants feeling able to report landlord failures without fear of intimidation or eviction.
- Include a clause about ensuring tenants are reminded by landlords to their tenants, they are in a residential area and will be expected to give good regard and consideration to their activities inside and outdoors, in gardens and communal areas to respect privacy and volume of their noise from voices etc. for the benefit of other residents this includes tenants and owner occupiers living in other residences
- It all depends on whether the Council will have the courage to include Party Houses in the licensing scheme and send a message that the city will not tolerate the kind of behaviour that many have to put up with. There has to be sufficient enforcement with residents supported over

noise issues.

- It is a basic necessity that rented properties are overseen by some independent body that can ensure they are fit for purpose
- Landlords have a duty and responsibility to provide decent accommodation, not ripping tenants off. They also have a duty to ensure the neighbourhood in which they operate is not blighted by property not being properly maintained. Brighton council should have the power to enforce decent standards...it will improve quality of life for all.
- Licences need to ask a fundamental question. Is a small terraced house with three to four separate households ever viable as an HMO? At the moment neighbours are not involved in the licensing agreement or its management. The HMO is seen in isolation from the neighbours and neighbourhood. Discussions only occur with the managing agents, landlords and tenants. Yet the landlord and managing agent - who receive substantial income from the tenancy - need to pay no attention to the impact on neighbours.
- Limiting the scheme to "properties of two or more storeys" might be inadequate. We have a house next door to us that has been divided into three flats - two downstairs with one occupant each and one student flat upstairs with six occupants. It is the upstairs flat which causes problems but it is unclear if it is covered by this scheme.
- Many private landlords now belong to landlord associations such as NLA and are strongly motivated to provide good quality accommodation. Conditions are improving and tenants expect a higher standard of accommodation than offered previously (such as when I was a student in Brighton). Meeting these conditions should be a nationwide exercise and could be linked to conditions in Assured Shorthold Tenancy agreements and this will cover both tenants and landlords. Introducing licensing is a local exercise and driven by increasing revenue to the local council with little impact on actually resolving these issues.
- Not sure how it will tackle anti social behaviour and noise unless the council threaten to remove the licence Also properties need to have unplanned inspections and speak to the tenants to stop landlords covering up problems
- On the whole, the standards seem clear and reasonable. Some of the paragraphs are quite vague - e.g. under property maintenance, "repairs are undertaken within a reasonable period of time" - what is deemed 'reasonable'? Of course, this could be intentional to allow flexibility, but it could be a source of dispute between tenant/landlord/council where there are different expectations on this.
- Only if BHCC employ enough people to check / follow up
- Overcrowding. 7 bedrooms in a moderate sized family home.
- Parking and the impact on the number of cars likely to be parked at one property particularly with the development of 6 to 9 bedroom HMOs which are effectively mini hotels with no consideration on the impact this has.
- Please pay particular attention to the issue of damp which can lead to ill health in many HMOs and in my experience is not taken seriously by landlords. It should be their responsibility to maintain good or excellent standards of ventilation, heating systems and insulation.
- Policing the system is the key issue, residents do not know how to complain
- Some areas of Brighton have been taken over by HMO's. This radically changes the mix of people living in an area and impacts on families, older people and others as they are subject to disturbance and annoyance.
- The conditions are only as good as the level of enforcement of them.
- The council needs to consider the impact that Additional Licensing of HMOs has already had, 1. Massively reduced the number of rooms available in shared houses as only HMOs can now be used as shared housing. The demand from the poorest and most vulnerable is for a room in a shared house. 2. The lack of supply of rooms causing a huge increase in rents. 3. Additional licensing has caused numerous consequences that were entirely foreseeable.
- The draft proposals use subjective language i.e. good order, reasonable order etc. There needs

- to be an appointed arbiter.
- The number of tenants should reflect the size of the original property (before any extensions) and neighbouring properties to avoid situations where, say, a three bedroom house becomes a five bedroom HMO because the lounge and dining room are used for letting and is adjacent to a three bedroom family home.
 - There has been no improvement in properties that have been licensed under your schemes
 - These standards should also be applied to Party Houses.
 - They are often too expensive to register and become a burden on the individual landlord who is trying to do the right thing. Slumlords will always get around it
 - Tighter controls over management of HMOs and more effective response to issues of ASB
 - Too many loopholes - i.e. "where practicable" which will undoubtedly lead to the minimum requirement being adhered to.
 - Too many poor quality homes that are the only option for people who cannot afford to live in the city otherwise. Standards must improve. The challenge will be to avoid passing on the costs of licensing to tenants if possible.
 - Unfortunately when agencies are contacted they do not seem bothered and can be unhelpful.
 - We get problems even from houses that are immaculate inside, such as Airbnb properties. Yet these are HMOs in themselves and the ongoing parties cause many residents huge problems and stress. What is needed is police on the beat and noise teams that regularly patrol the area at night.
 - We have had to involve the Council to help us with anti-social noise levels and behaviour with previous tenants in the house next door to us.
 - We live in a free market society, local government interference should be avoided
 - Who will inspect the properties? Are there resources to see this through? Who will tackle anti-social behaviour? The proposed conditions can only be upheld with the resources to implement them.
 - Why are Party Houses not included?
 - Will the proposed standards include the requirement on landlords to address issues of damp?
 - You can have all the licensing in the world, but if it's not enforced, and history suggests it won't be, then it's worthless.
 - You don't make any mention of the inclusion of party houses in your proposal, can you please advise why? These need to be classified as businesses, use only business waste, not residential schemes and be included in your proposals.
 - ❖ A very good proposal that protects and supports the landlords and their tenants.
 - ❖ An excellent scheme for our modern and diverse City that will support the rented sector all over the area.
 - ❖ Any schemes that support and bolster the rented sector are to be supported. It is a vital part of our great City.
 - ❖ Because it supports the private rented sector, an essential and much needed to be regulated sector in the City.
 - ❖ BHCC deserve support from the public across the City for these proposals.
 - ❖ Bolsters the rented sector in the City.
 - ❖ Can only bring harmony and fairness so deserves to be supported.
 - ❖ Cannot make my mind up! Interviewer did spend quite some time explaining the proposals and answering questions but cannot come down either "for or against".
 - ❖ City needs a well regulated rental sector and this proposed scheme does that.
 - ❖ City very dependent on rented sector. It needs proper legislation and rules, and enforcement of them.
 - ❖ Dazzling range of good ideas that will protect and enhance the rented sector.
 - ❖ Detailed and important proposals to help the rented sector.
 - ❖ Essential to have a fit for purpose letting scheme in our City. This undoubtedly helps.

- ❖ Excellent proposals to support the rented sector.
- ❖ Excellent proposals to support the rented sector.
- ❖ Excellent proposals, needed and they will boost the rented sector in the City.
- ❖ Excellent proposals. Seem to have just about all the aspects (and more!) covered.
- ❖ Excellent proposals. Standards very high. Fair to all involved. Similar schemes doing well elsewhere. Support.
- ❖ Good for the renters, good for the landlords and good for the City.
- ❖ Good news! The proposals are very detailed, will be setting very high standards for the rented sector in the City.
- ❖ Good proposal that will raise the standards in the rented sector.
- ❖ Good proposals that will sustain the rented sector.
- ❖ Good proposals. The needs of all those involved taken into account. Enforcement key to the success of the scheme.
- ❖ Good scheme that will support rented sector.
- ❖ Good scheme that will support the rented sector.
- ❖ Good work by BHCC. Enforcement of the proposals will be the key.
- ❖ Helps the renters.
- ❖ I am now an owner but I was once in the rented sector in Hove. These proposals are really very good. Would be amazed if anyone could be against them. They are fair and worthy of support.
- ❖ I support these proposals. Many people will never be able to own their own place and face a lifetime of renting or being in social housing. It is essential that they are supported all the way by reasonable, fair and modern rules and regulations. This scheme will do that.
- ❖ If it helps sustain and even boost the rented sector, I am all for it.
- ❖ If other schemes are working out well, I am quite sure that these very detailed proposals will too. Support.
- ❖ Important part of the local economy.
- ❖ Important that the rented sectors across the whole City are well regulated and fair. This will do that.
- ❖ Important to safeguard all those in rented sector and these proposals do just that.
- ❖ Important to support the rented sector x2
- ❖ Important to the continued growth and achievements in the City to support the rented sector.
- ❖ Impressed by these proposals. The team of BHCC are to be congratulated. Let's make sure that all the standards and rules are fully enforced.
- ❖ Impressive. BHCC really taking this matter seriously. Good to see. These proposals will really help the rented sector across the City.
- ❖ It is needed across the whole City.
- ❖ It is very important to the well being of the City that all renters are in schemes to help keep them safe and ensure that they are fairly treated.
- ❖ It is very likely that few, if any, of the renters will ever be able to afford to buy unless they have family support or there is a massive crash in prices. So it is vital that the renters are in a scheme like this that really does support them.
- ❖ Lots of info. Proposals sound good. Support.
- ❖ Making sure rented sector functions well is essential for our City. Will encourage people to come and live in our lovely areas.
- ❖ Massive changes since the banks crashed and austerity arrived. Lots of people quite simply will never qualify for a mortgage and house prices in the City are astronomical. Given that, it is the rental sector that needs to be well regulated to protect the tenants. Enforcement of the scheme will be absolutely essential to its success.
- ❖ Modern solution to an old problem. The scheme sounds to be very well thought out and will be a boost to the City. It will encourage people to come to live here if there is PR and publicity about the proposals.

- ❖ Needed across the whole City as it is working well elsewhere.
- ❖ Needed across the whole City.
- ❖ Needed. Fair. Other similar schemes in place. Lessens the risk of homelessness. Supports a very important sector in our City.
- ❖ Needed. Fair. Supports rented sector. Will boost the City.
- ❖ Needed. Will work.
- ❖ Nobody really could object to this surely? It is a very well thought out scheme that I am quite sure will find favour.
- ❖ Not everyone can afford to buy, so supporting the rented sector is good.
- ❖ Not sure this massive amount of red tape will work. Might well result in fewer letting opportunities across the City.
- ❖ Now buying but used to rent in the City. The rental sector is vital to the continued growth and getting skilled workers to come and live here. These very detailed and well thought through proposals will certainly raise the standards and boost the City.
- ❖ Our brilliant and exciting City/economy needs to be underpinned by well thought out rules and regulations. These for the rented sector are excellent and worthy of support.
- ❖ Our City has a very large rental sector and it is important that it is well run.
- ❖ Our City has large numbers of renters who need to have as much help and support to ensure that their terms and conditions are fair, that they are not exploited and are at the lowest possible risk of becoming homeless.
- ❖ Our City is a great place to live and we must ensure that whether people are buying or renting, there is equal treatment and no stigmatisation. This scheme is a very good attempt by BHCC to focus and boost rented sector and will bring success. Similar schemes are doing well across the City and I look forward to the whole of the City being regulated in this way.
- ❖ Our City thrives on diversity in people and housing terms. Very important that we have a well run and fair rented sector and the proposals will help create that. Bit surprised some aspects of the scheme were not in place already. Encouraging that schemes in other areas are going well.
- ❖ Our City thrives with its home ownership and rented sector. We have no difficulty in encouraging people to come and live here. But we must always be seeking ways to make the rented sector safe, secure and fair. This scheme will do this.
- ❖ Our diverse City needs to be underpinned with schemes such as this one. A great idea and well done to BHCC.
- ❖ Our successful and busy City needs to have a fair and workable scheme in place to control the rented sector. These will do that.
- ❖ Out here in Rottingdean, it is a very different housing world to other parts but we all live in the same City and have shared values. This scheme will be of benefit to all those in rented sector, landlords, tenants and BHCC acting as good custodians.
- ❖ Overdue I think but glad that it may be coming to our part of the City too.
- ❖ Overdue. Fair. Works in other areas already.
- ❖ Overdue. Gives a boost to the rented sector. Lessens the chance of homelessness.
- ❖ Pleased to hear about the proposals. Important to protect the rented sector.
- ❖ Pleased to learn about this excellent scheme that gives support to the renters across the City.
- ❖ Proposals and scheme are very good and detailed. Scheme will help sustain the rented sector across the City.
- ❖ Proposed scheme sounds good. Takes notice of the needs of both landlords and tenants. Will make the City a better place to come and live in.
- ❖ Protects renters, imposes high standards on landlords, lessens the risk of homelessness.
- ❖ Really like the sound of this scheme. It seems that an awful lot of work has gone into it - it is so detailed. Well done.
- ❖ Rented sector is important and needs to be looked after.
- ❖ Rented sector is vital to the City. These proposals seem to ensure that the parties involved get a

good deal. Well done BHCC.

- ❖ Rented sector needs support and fair and equal legislation.
- ❖ Scheme is fair to landlords and tenants. It will support the very important rented sector in the City.
- ❖ Scheme sounds really good. Lots of excellent proposals.
- ❖ Schemes in other parts are going well.
- ❖ Seems to be doing well (other similar schemes) in other parts of the City and will do across the whole "patch". These are modern and reasonable proposals from BHCC that will gain wide support.
- ❖ Similar schemes in place elsewhere. Fair to landlords and tenants. Supports the rented sector in the City.
- ❖ Sounds a marvellous and well thought out scheme. The standards will be very high and the regulations will be monitored.
- ❖ Standards in the proposed scheme are very high - as they should be. Rented sector will flourish when it is introduced.
- ❖ Supports renter
- ❖ The City is a vibrant and successful place but we do need to ensure that all sections of our community get the support and help when they need it. Rents are sky high here, how people can afford them amazes me. Many in the community will never ever be able to raise a mortgage. The spectre of homelessness raises its head. Hopefully, this scheme will lessen the chances of that.
- ❖ The City needs a well regulated rental sector. These proposals will provide that. Enforcement is the key to its success.
- ❖ The reality is that post recession the long held aspiration to own your own home is never going to be possible for a significant number of people in the UK and in our City. That said, it is essential that those who are renting have the highest standards to protect them. This clearly does that and demonstrates the good work that BHCC are putting into the matter.
- ❖ The rented sector (private and social) needs to be well run, fair and meet the needs of landlords, tenants and BHCC.
- ❖ The rented sector is very important to the City. These proposals both enhance and support it.
- ❖ The rented sector needs good rules and regulations to help it run smoothly and these proposals do that.
- ❖ The standards are going to be very high - and so they should be. Rented sector is a very important part of the City and these proposals really will help.
- ❖ The whole of the City should have the same rules and regulations for the rental sector.
- ❖ These are excellent proposals and will help to support the rental sector and ensure it is fair to all concerned. Very detailed.
- ❖ These are excellent proposals. Very comprehensive. Well thought out. Creates very high standards. Worthy of support.
- ❖ These are very detailed proposals. Somebody has been working hard on them and they and BHCC are to be congratulated for that. I support this 100%
- ❖ These are very sensible and well thought through proposals from BHCC. There is a vast amount of detail to take in but I have the general conception that proposed scheme will be a benefit to the City and promote an equitable and fair rented sector that will encourage people to come and live here.
- ❖ These BHCC policies are just what our vibrant and diverse City needs. Whether you own, rent or are a landlord, we all need good schemes in place and this is.
- ❖ Think that BHCC should keep out of this one. I can see it ending up with fewer landlords and higher rents, potentially increasing homelessness.
- ❖ This area probably has very few HMOs. However, other parts of the City will have concentrations of them that provide accommodation for the lower paid and students. House prices have rocketed. "Normal" family housing is now costing many hundreds of thousands of pounds.

Important we support the rental sector and that is fair to all those involved.

- ❖ This is a very comprehensive and persuasive scheme that BHCC is proposing. It ticks all the boxes in my opinion and give a boost to the rented sector and the Citywide community.
- ❖ This might unintentionally reduce the number of landlords and hence put up rents.
- ❖ This will only result in fewer landlords, fewer properties to let and higher rents.
- ❖ Tremendous effort by BHCC to cover all aspects of the rental sector in legislation. Will boost our community/City.
- ❖ Very comprehensive proposals, well explained to me. Important that there is 100% enforcement.
- ❖ Very detailed and excellent proposals. Standards very high. Support.
- ❖ Very detailed proposals to support the rented sector.
- ❖ Very good news. Rented sector needs all the help that it can get. Scheme much needed.
- ❖ Very important that we have fair and well organised rules and regulations for the rental sector.
- ❖ Very much in favour of these BHCC proposals. The rented sector must be protected and encourage people to come and live in the City.
- ❖ Very worthwhile exercise.
- ❖ Vital that we challenge and do something about the risks that some of those in rented sector face from bad landlords, poor quality properties, unsafe equipment and in some cases even homelessness.
- ❖ We are a long way from the City Centre but still very much feel part of the culture and community. These will be boosted by this excellent BHCC scheme.
- ❖ We are owners but are keenly aware of the importance of supporting and protecting the rented sector. These proposals do the job.
- ❖ We must do all that we can to boost and support the rented sector across the City.
- ❖ We need the same "rules" across the whole City for the rented sector. This proposal does that, so I support this.
- ❖ Well done BHCC in creating these proposals. Essential that the rented sector works well and appropriately for all the parties involved and these do exactly that.
- ❖ Well done BHCC. Excellent proposals. Standards are very high. Will support the rented sector and protect the rights of all those involved.
- ❖ Well thought out proposals.
- ❖ What clever ideas! Well done BHCC.
- ❖ What well thought-out proposals these are. Very detailed, very workable and very worthwhile supporting.
- ❖ Will give the City a real boost and support the rented sector.
- ❖ Will protect and support the rented sector across the City.
- ❖ Will reduce the numbers of tenancies and hence increase the rentals.
- ❖ Will result in fewer landlords, fewer rentals and hence higher rents - not good.
- ❖ Will support the rented sector.
- ❖ Will work.
- ❖ Would prefer it if BHCC kept out of this subject. Although probably well intended, it might produce a counter-effect where there are actually less properties to rent, so the effect will be to raise rents.

Private rented tenant in Brighton & Hove

- I live in a basement flat of a converted Victorian property. There are three self contained flats (including mine) in the house. The rent money is collected by a letting agent but all other issues are dealt with by the landlord. He is fantastic and if anything is wrong he deals with it really quickly. I am concerned that any additional costs to the landlord/ letting agent will be passed on to the tenants resulting in my rent going up which I would really, really struggle to afford.
- As per a number of comments made by HMO residents it would appear there are certain Private

Landlords and Agencies who the second the HMO's were introduced in our old area of Queens Park/Hanover simply found various loopholes in the HMO scheme to continue to rent to students. Again, from what I understand of this area (thanks Hanover Community Noticeboard group on FB) I can't see much evidence HMO's have helped improve these ongoing noise, rubbish, standards issues.

- Currently landlords seem to be able to get away with anything. So the new proposals have to be a step in the right direction.
- Enforce a required response time from landlords. If say communication has been sent to the landlord and not acted or responded to within a set time frame there should be a charge for the landlord or letting agent responsible. The fine could go partly to tenants and partly to the council to cover the cost of enforcing it.
- Essential to restore neighbourhoods to a reasonable condition
- Families are at a disadvantage as renters: they often have only 1 or 1.5 incomes and in addition, they take better care of the properties and the neighbourhood. Licensing would at least make sure that landlords use the additional income to take better care of the property, thus putting HMO renters at a more equal footing with families.
- HMOs discriminate against those who, whether through choice or circumstance, do not live in nuclear family units. Although this legislation is presented as protecting those in rented accommodation, because of the cost to landlords of the licensing scheme and the reduction in the supply of rented houses, it is experienced primarily by tenants as a rent rise and shortage of properties in desirable locations. It seems ridiculous that a group of unrelated adults living together needs more state protection than a family with several children. The constant publicity around reporting HMOs has made those who have formed households with friends feel that they are not wanted in their neighbourhoods and are under surveillance. Renters in the city face very real problems such as high rents, insecurity and abysmal housing conditions, however, HMO legislation will not tackle these. Rather than focusing on properties according to the household makeup, the council should think more imaginatively about the criteria they use to regulate problematic parts of the rental market. For instance, short term tenancies are harmful to everyone - for tenants they mean regular evictions and rent rises, whilst proliferation of such tenancies disrupts and destroys communities. If the council was to focus its regulation on short term lets, it would encourage landlords to offer longer tenancies which would be beneficial to all.
- I am lucky I live in a well maintained 1 bedroom flat where if I do have any issues I can speak to the manager/office and they will sort it out. I cannot afford a higher rent for things I don't need!
- I believe all the private tenancies require better regulation, in order to protect the health and wellbeing of those living there.
- I feel extending HMO licences to smaller properties would discourage landlords from private letting altogether. As I mentioned before I'm seeing more and more holiday lets and short-term lets on the market and even less affordable private tenancies being offered. I think landlords with smaller portfolios of properties would be more disproportionately affected by the extra costs rather than larger landlords, and I feel it's usually larger landlords that tend not to be so available or manage maintenance for their tenants. Also what I find is that some landlords are letting properties within a building where they are leasing from an overall freeholder so I feel that in communal areas the Landlord may not have much power to improve overall building conditions.
- I find these proposals totally unnecessary!! They are not needed nor wanted!
- I think anything which holds private landlords to better account will be welcomed, especially if it can also help with the housing crisis.
- In a time where cuts in services seem to take priority over the general upkeep of the city it seems hard to realistically expect any improvements to be seen regardless of increased licensing fees. Further more all of the questions so far have related to HMOs. Surely if these changes are

to improve conditions surrounding landlords and tenants of HMOs only properties used as HMOs should be affected by the proposed changes. Most HMOs in the city are occupied by students. Most students who choose to spend time in Brighton and Hove are aware that costs in the city are higher than almost anywhere else in the UK it is not right to expect all residence to fork out for costs incurred by unscrupulous landlords and tenants. The cost should be met by the offenders in the same way that non-car owners do not contribute to residents parking schemes.

- It is good that it proposes to cover smaller HMOs, as these are places where landlords are bending the rules and subdividing, as not so obvious as with a large house. Property inspections and licensing are all well and good, but these conditions should have proper 'teeth' and violations should be prosecuted, with severe financial penalties for transgressors, and possible denial of future licenses. And they should not be allowed to hide behind property management companies.
- It will help people to have a better standard of living.
- It will increase my rent
- It would be a positive for tenants to have support from the council, as dealing with landlords and their managing agents can be a worry. You are often ignored, or live in fear that if the property is repaired or maintained to a decent standard, you will then be faced with the bill i.e. the rent will go up to such an unmanageable amount you will have to move. My flat is cold, damp and shabby and, very energy inefficient. We have had scaffolding to the outside of the building for over 3 years. I can't see out of my basement windows, so it's very dark. That said, I have affordable rent and don't want this to change as I would have to move out of the area. I have lived here for 17 years.
- It would bring no benefit to local residents whatsoever apart from an extra cost which is not needed. The issues that you state within this survey which to my opinion are minimal can be dealt with by the council directly contacting the landlords required. The new licencing fee would not affect the landlord of multiple properties as financially as much as local residents, which is strongly unfair, as these issues that again I see as minimal should be dealt with solely with landlords who are not meeting required standards. I live around properties such as HMOs and can strongly confirm I have never had or seen any problems within my local area. Again this would suggest it to be unfair for you to increase the price of licencing across the city when it may be the case only certain areas require work, which in-turn proves my point, that certain landlords need to be tackled under current council regulations. Does this not suggest, the council themselves are not meeting current regulations by approaching rogue landlords and dealing with them directly. How unfair to make this a city resident problem.
- It's fairly obvious that landlords will simply pass the cost of licensing on to their tenants. Rents are already high enough
- Landlords should be made accountable to mend/ fix property within a reasonable amount of time
- Sadly, most landlords will do the minimum required to let their properties. Safe, secure housing has to be a right for all tenants. Landlords must appreciate that their revenue stream is their tenants' home. Licensing will go towards improving the quality of housing provision.
- The HMO negatively impacts professional sharers; this should be taken into account. Rents in the City are very high hence the need for adult (non-students) to share the HMO negatively impacts this group.
- There is no need
- There needs to be external inspections of conditions/ or an ability to report poor conditions, outside of the landlord or the letting agent. Letting agent fees needs to be scrapped or drastically reduced. At the moment they are out of control, with tenants being charged approx. £180 for a typed word document that includes their name, which took someone 5 minutes to delete the previous tenants name and then print. Half the time the agents can't even get that right, but still including incorrect tenant details on the new contract.

- This is solely another way of gaining money into the councils coffers I think it is totally disgraceful that many people living on the pittance that they get to live on...me included....we already pay for rubbish removal u from the DWP will have the cost of the licence added to their rent I have received a letter today informing me of that. We already pay...through council tax for the removal of rubbish.
- This new licensing proposal will increase rents in an area where rents are some of the highest in the country.
- This proposal will significantly change the conditions of multiple occupancy homes due to the increased scrutiny of landlords and create accountability to ensure they provide good homes for their tenants. Currently landlords have no accountability and therefore reduce standards in order to make profit and have little to no concern over tenants' well-being. This is a significant issue across Brighton & Hove and ideally this proposal should be implemented citywide.
- This will only work if it's enforced. A wholesale look at all renting in the city I think is a more pressing priority.
- Worried that more costs will be passed to tenants already paying high rents.
- ❖ A big, big issue. The proposals are very detailed (well done BHCC) and really sound like they will keep the rented sector well in our City.
- ❖ Because it will help to protect my rights and I rent.
- ❖ Brighton and Hove is a great place to live and it is important that we have a well regulated, fair and supporting framework for the rental sector. These proposals do that.
- ❖ Bring this on! We rent. Really want this scheme to come in across the City. Our landlord is good ... but not all are so fully supportive of these proposals.
- ❖ Fair to all parties. Needed. Treats the whole City in the same way.
- ❖ Fully support. Other schemes doing well in other parts of the City. I rent.
- ❖ Good proposals that are fair to all involved. Enforcement essential. We rent.
- ❖ Helps me and all the other renters across the City. The proposal seems very fair but there is a lot of detail. Enforcement needed too.
- ❖ Highly unlikely that I will ever own my own place, so it protects me as a renter.
- ❖ I am in the rented sector and welcome all schemes to support and enhance them. This one certainly does that.
- ❖ I rent!
- ❖ I rent, so it benefits me.
- ❖ I rent, so it will protect me and support me if there are any problems/conflicts with my landlord.
- ❖ I rent, so very much in favour. The proposed scheme sounds very good. Good to have a well regulated rented sector in the City.
- ❖ I rent. Similar schemes are doing well in other parts of the City. No reasonable person could refuse to implement this.
- ❖ I rent. That said, it will give a boost to the whole City if this is adopted.
- ❖ Important that all City dwellers have support and regulations in place to boost their well-being and safety. This is a good scheme, so bring it on as soon as possible as in parts of our City there are still the sights of street sleepers and the homeless.
- ❖ In my interests as we rent.
- ❖ In the past few years, I have lived in HMOs in Brighton affected by: no hot running water, broken boilers, unresponsive landlords, severe damp and mould.
- ❖ It is overdue and much needed. Similar schemes are working well in other parts of the City.
- ❖ It will make the City a better place to live in as it supports and regulates the rented sector.
- ❖ Lots of hard work has gone into this. Well done BHCC. The proposals are very detailed and the bar is very high on the standards sought. That is excellent and will make the City a great place to come and live.
- ❖ Much needed. Fair. I rent.
- ❖ Needed. I rent.

- ❖ Rented sector very important and has to be supported/well run. This helps.
- ❖ Rented sectors need high standards and to work fairly to all parties involved.
- ❖ Scheme covers all aspects of the rental sector and the rights of all parties. Very detailed and fair.
- ❖ The rented sector across the City is very important and it is essential that it runs well for all those involved and is fair to them all too. The standards are very high and I think that the scheme will be a very big success and make the City a good place to come and rent or even be a landlord.
- ❖ The rented sector is crucial to the economy and well-being of the City, so it is important that it is fit for purpose. These proposals are.
- ❖ The rented sector is very important to the City and these proposals will give it a boost.
- ❖ This will help our City do better. When news spreads it will encourage people to come and rent, as we will have such a fair and modern scheme in place.
- ❖ Very comprehensive proposals that will help the rented sector.
- ❖ We rent x 3
- ❖ We rent so it is in our interests to support these proposals. By the way, they are very good ones.
- ❖ We rent, so it helps us. Thank you to BHCC.
- ❖ We rent, so it is in our interest and those like us.
- ❖ We rent. Scheme helps both tenants and landlords. Standards are very high.
- ❖ We rent. The proposals are very good ones that protect us and our landlord.
- ❖ We rent. We support schemes that help the rented sector whether they are in HMOs or not.
- ❖ We rent. We will probably never be able to own our home, so it is important that our accommodation is well regulated, fair and supports all those involved.
- ❖ Well done BHCC with these excellent proposals. Rented sector vital to the well being of the City and these proposals will support that.
- ❖ Well done to BHCC. This sounds a very comprehensive attempt to really get the rented sector up-to-date and make it fair, workable and a good reason for people to choose to live here.
- ❖ Wow, a lot of brilliant proposals for people like us who rent. Very modern, very detailed and I am very much in favour!

Social housing tenant in Brighton & Hove

- Gas inspection is particularly important given that council tenants are inspected on a 10 month basis but this is only effective if all properties in a block are treated similarly.
- These party homes are rented out to a minimum of 14 people per house and although I have access to a telephone number I can call for noise control, very little is done. Litter is left on the streets until at least the Monday afternoon. Landlords should be fined and pay business tax according to how much they are renting out these properties. There should also be respite for at least two months of the year, so that residents do not have to endure the noise and rubbish 52 weeks of the year.
- ❖ An excellent proposal, well worth supporting.
- ❖ Because it is modern, thorough and fair.
- ❖ Because it supports and helps the rented sector.
- ❖ Because it will help the renters individually and the rented sector generally.
- ❖ Being in social housing rather than private rental, we have always felt safer and better treated than the latter. These proposals significantly raise the bar for the landlords (and their tenants) in private rented and that is a good thing.
- ❖ BHCC to be applauded for a scheme that strikes the right balance and takes into account the wishes/roles of landlord and tenants.
- ❖ BHCC trying to do their level best to improve and encourage the rented sector in the City. These are incredibly detailed proposals. Surprised that certain of them are not already in place. Support the proposal and its swift implementation.
- ❖ Brilliant proposals. Enforcement of them is vital.
- ❖ City needs a well regulated rented sector.

- ❖ Gives support to those who are renting.
- ❖ Good rules and regulations are needed to keep the community looked after and safe. Rented sector very important to the City and these proposals will help its fairness and smooth running.
- ❖ Good scheme that will protect the rented sector and ensure its smooth running.
- ❖ Good scheme. Similar ones doing well elsewhere in the City. Rented sector and its success is vital to the future of our City.
- ❖ Great to see BHCC doing this. Excellent proposals with very high standards for both landlords and their tenants. Everything we do for the rented sector is a good thing. If it is well regulated, it will be a success. The extreme result of it not being well regulated would be homelessness.
- ❖ Great work from BHCC. These proposals are excellent and will lead to a well regulated and successful rented sector across the City.
- ❖ Helps protect the rights of the tenants.
- ❖ I welcome these very comprehensive proposals. Rented sector and its smooth running are essential to the success of our City. This scheme will achieve that.
- ❖ It is a very detailed and well thought out scheme that will protect and support private renters across the City.
- ❖ It is very detailed, covers lots of the important aspects and has my support.
- ❖ My goodness! What a detailed scheme. "No stone has been unturned". Enforcement will make or break it.
- ❖ Other schemes in place in the City. Will support the rented sector. Overdue. Fair.
- ❖ Other similar schemes seem to be doing well. It seems that we can now go City wide with these proposals.
- ❖ Our City has a large rented sector, both private and social, and any efforts made to make it easier and better for them. I support.
- ❖ Private rented sector of the City needs to be well regulated and fair to all the parties involved. This scheme seems to do just that.
- ❖ Proposals sound very good. Supports both landlords and tenants and will give a boost to the rented sector in the City.
- ❖ Rented sector is so important to the City. These proposals will support it.
- ❖ Rented sector needs all the support it can get and this scheme gives lots of that.
- ❖ Rented sector very important as is the need to help it run smoothly and fairly. These proposals do just that. Will definitely help.
- ❖ Rented sector vital to the City. Needs good and fair regulations to all involved.
- ❖ Renters are a big part of the City and all efforts should be given to make sure that they are well looked after in terms of regulations and security of tenure etc. This scheme certainly will be a big move in the right direction.
- ❖ Renters, be they private or social, need all the protection that they can get. The scheme sounds really good with very high standards being imposed.
- ❖ Scheme sounds fair to all of the parties involved. Proposals raise the bar to a very high standard. Other schemes in place too.
- ❖ Supports the rented sector. Similar schemes are doing well.
- ❖ The standards will be very high and rightly so in my opinion. The rented sector is vital to our City and all actions taken to make it better should be supported.
- ❖ These sound very well thought out proposals. Landlords must step up to the plate and do the decent things for their tenants. A good idea.
- ❖ Very comprehensive proposals. Really would like to see this adopted across the whole City.
- ❖ Vital that the rented sector is run fairly and supports all those tenants.
- ❖ We rent, so it ought to support us and give us more security. Thanks BHCC!
- ❖ We support those who rent. All for that.
- ❖ We will always be in rented sector as there is no way we will be able to raise a deposit, let alone arrange a mortgage with the current prices and our pay. Schemes like this will help us and others

who have the same sort of financial future.

- ❖ Well done BHCC for developing these ideas into a scheme. Ticks all the boxes and will sustain the rented sector right across the City once it is adopted - feel sure that it will be.
- ❖ Well done BHCC. Great proposals, bring it on.
- ❖ Will protect tenants.
- ❖ Wow! What a detailed proposal. Absolutely everything seems to have been included. Strongly in favour.
- ❖ Yes, other schemes doing well. Very detailed proposals here. Is fair to all concerned.

Live in a shared home or HMO

- I think they are much needed however I am concerned that ultimately it might further price working class people from the city. There needs to be a framework in place to ensure that costs of bringing poor quality housing up to standard is not directly passed onto, or becomes a pretext to raising rent to, people who are already struggling to meet the sky-high cost of renting in Brighton and Hove.
- I agree that the council should force landlord to maintain there properties although the rent my landlord charges isn't sky high but still believe a home should be warm I have lived in this building for 4 years and I have mental health problems and if wasn't for Homemove changes I wouldn't be here I claim ESA and PIP but for some reason this property makes it I'm not a priority.
- Concerned that my landlord will increase the rent to cover the licensing cost.
- It will only work if inspections are getting carried out and if not satisfactory followed up
- ❖ All who rent in the City will support these proposals.
- ❖ Am in the rented sector. Very pleased to hear about the proposals.
- ❖ Because it will help people like me who rent. It will also give status to the landlords to be part of the scheme and support the wider community.
- ❖ Because it will help us as we rent.
- ❖ Because the proposals are so good! Lots of time and effort has gone into this. It is fair to all parties. We rent, so it will benefit us.
- ❖ Great proposals, enforcement essential.
- ❖ Great proposals. Rented sector needs good and fair rules.
- ❖ Helps and supports people who rent.
- ❖ Helps protect and support people who rent, like us.
- ❖ Helps us as we rent.
- ❖ I am a part of the rented sector, so am all for schemes and proposals that make my life better.
- ❖ I am in the rented sector and proposals such as these will ensure that all parties in that work together to produce workable and fair practice.
- ❖ I am unlikely to ever have my own home, so it is important that conditions around my rental/tenancy are fair. The proposals do that.
- ❖ I benefit as do other renters.
- ❖ I rent
- ❖ I rent so it is in my interests!
- ❖ I rent so it well support my rights. These proposals are very good and I would be very surprised if anyone could put up a reasonable argument not to implement it.
- ❖ I rent, so all proposals that help me I will support/go with.
- ❖ I rent, so in my interest.
- ❖ I rent, so it helps me. These are very detailed standards, so thank you to BHCC for getting it all ready
- ❖ I rent, so it is in my interests to see this adopted as soon as possible.
- ❖ I rent, so it is in my interests!
- ❖ I rent, so it will help me and other renters.

- ❖ I rent, so it will help me.
- ❖ I rent, so it will help me. Will be great if all these standards are enforced.
- ❖ I rent. Proposals sound well thought out and comprehensive. Bring it on.
- ❖ I rent. Similar schemes doing well elsewhere in the City. Fair to all those involved, landlords, their tenants and BHCC.
- ❖ I rent. That said, I do not think anyone could seriously object to such a well organised and detailed BHCC scheme. Bring it on.
- ❖ In my interests, I rent. Proposals are very, very good - nobody could disagree with them?
- ❖ In our best interests as we rent.
- ❖ In our interests as we rent.
- ❖ In our interests as we rent.
- ❖ In our interests as we rent. BHCC has spent a lot of time and effort on this. The scheme is very comprehensive and will get the desired results.
- ❖ In rented sector, a very important part of our City economy, so schemes like this help me and other renters.
- ❖ In the rented sector (HMO) so these types of proposals benefit me.
- ❖ It is great for people like me, who rent but it also seems fair on the landlords and BHCC too. Bring it on.
- ❖ It will mean the whole of the rental sector across the City will be well looked after.
- ❖ Proposals are detailed and fair to both sides. Bring in as soon as possible.
- ❖ Rented sector is big and important in the City and needs to be well regulated.
- ❖ Rented sector very important to the City, so needs modern, practical and team playing from all parties involved.
- ❖ Rented sector very important to the City. Has to be well regulated. We are renters.
- ❖ Rented sector well looked after with these new schemes.
- ❖ Simple, we rent.
- ❖ Supports the rented sector
- ❖ The proposals are very detailed and seem to cover all aspects from the perspective of the tenants and the landlords - no easy thing, so well done BHCC.
- ❖ The proposals sound very good. They cover an enormous amount of issues, everything from the property itself to what goes on inside it.
- ❖ There are too many homeless and street sleepers in the City. Rents are very high. Mortgages and all that will never be an option for me. So it is very important that those in rented sector receive as much support via legislation as possible.
- ❖ Very progressive scheme that strikes the right balance for the rented sector participants. Similar schemes in place elsewhere in the City.
- ❖ We are in the private rented sector.
- ❖ We are in the rented sector, so this is very much in our interests.
- ❖ We are renters and have a good landlord but not all renters do, so that is why we support these proposals.
- ❖ We are renters and it is in our interest x 2
- ❖ We are renters, so these proposals ought to help us. They seem fair to all concerned.
- ❖ We are tenants and in an HMO, so will benefit greatly from the proposed scheme.
- ❖ We rent x 13
- ❖ We rent and live in an HMO, so a "no brainer".
- ❖ We rent and so this will help us.
- ❖ We rent our place so this will help us.
- ❖ We rent so in our interests.
- ❖ We rent, simple as that.
- ❖ We rent, so bound to support the scheme.
- ❖ We rent, so definitely in our interests. That said, the standards are very high in this scheme, so it

really ought to produce "best practice" all over.

- ❖ We rent, so helps us.
- ❖ We rent, so in our interests.
- ❖ We rent, so in our interests. That said, scheme is very well thought out.
- ❖ We rent, so it helps us if the proposals are adopted.
- ❖ We rent, so it is a no brainer. That said, proposals are well organised and thought out and will support the rented sector across the City.
- ❖ We rent, so it will help us x 2
- ❖ We rent, so it will protect and support us. Enforcement vital to the success of the proposed scheme.
- ❖ We rent, so the scheme will help us.
- ❖ We rent, so will benefit.
- ❖ We rent, so would be mad not to support this!
- ❖ We rent. Looking forward to the proposals going through as soon as possible.
- ❖ We rent. Proposals seem fair to both sides. Similar schemes doing well elsewhere. Bring it in as soon as possible.
- ❖ We rent. The proposals are good ones. Will make the City an attractive place to come and live in. Basically, a well thought out and fair scheme. We support it.
- ❖ We rent. The proposals are very comprehensive and will help the rented sector all across the City.
- ❖ We rent. The proposals are very detailed and well thought out and will work.
- ❖ We rent. The proposals are very good and to a high standard. Similar schemes are working elsewhere.
- ❖ We rent. These are excellent proposals and will help protect and support the rented sector.
- ❖ Well done BHCC for supporting the rented sector with these proposals. Please enforce all aspects.

Letting/ managing agent

- Not proven to raise standards in other licensed areas
- Licensing doesn't change landlord's behaviours in my experiencing. Those who are used to cut corners will continue to do so. I suggest a robust pre-let requirement to be introduced instead.

Landlord of property in Brighton & Hove

- A number of these conditions are already law, others not explained, i.e. licence limitations/changes. No sensible reply can be given as all are 'lumped together' and no reference made to the cost against possible benefits.
- As an HMO Owner/landlord, I agree with the scheme in principle but I can't help thinking that it is at least partly just a money making scheme by the Council to make up for the lack of council tax income coming from student-occupied properties. Some of the provisions are very heavy handed on people like me who try to be good landlords and treat their tenants as they would want their own family to be treated. The licensing fees to the council are excessive, especially on top of the costs of doing the required works.
- As someone who tries to be a good landlord they seem reasonable. As the father of a student tenant it would be great to see standards enforced.
- As the trustee for a charity owning a small HMO in East Brighton, I became aware that small improvements were needed on our property as a result of the HMO investigation, mainly to do with fire and smoke safety. It would be wise to insist on such standards throughout the City.
- Brighton and Hove City Council (BHCC) itself is a huge purchaser of some of the worst quality, revolting, slum accommodation in the city. Particularly, so called 'temporary, emergency' accommodation that is purchased from a small collection private landlords. BHCC routinely pays £40-£140 per night, per revolting bedsit, in privately owned HMOs that most of us would not

keep a dog in. Such accommodation falls so far short of what any local authority would be permitted to provide directly it defies description. There is no definition of either 'temporary' or 'emergency' and indeed much of the slum accommodation purchase is for long-term tenants. Vast sums of taxpayers' money are spent with just a handful of private landlords to procure 'temporary' accommodation without any contracts whatsoever in place; millions spent on spot purchasing. This not only leaves the system wide open to financial impropriety and corruption, it also results in complete failure of minimally acceptable accommodation standards to be set. The only 'standard' that BHCC mandates for the grimy, shabby, soiled accommodation it so abundantly purchases is for the HMOs to have an HMO licence, which is basically sets minimal standards for room size, fire safety, and damp requirements. There are no standards for amenity, decoration, cleanliness, modernity, maintenance, facilities. It is indefensible. BHCC should clean up their own back yard and set an example with the private landlords they choose to do business with before setting standards for others. It is hypocritical and shallow to do otherwise. Lead by example. Comments recently overheard regarding a 'temporary, emergency' HMO in central Hove that BHCC Adult Social Care/ Sussex Partnership NHS Foundation Trust purchase accommodation from to temporarily house mental health outpatients. The comments were complaining about the caked and dried defecate and vomit and how revolting it was for them to go there to work. People should not even be expected to visit these places in their work, much less be expected to live in such grim accommodation at the expense of taxpayers. If BHCC cared at all about standards they would start with the landlords they themselves pay eye-watering amounts of our money to for revolting, substandard accommodation. BHCC states in the consultation preamble that the by applying the additional licencing scheme the council is able to ensure, through compliance with the license conditions, landlords are providing well managed homes. HMO licensing in no way ensures provision of 'well managed homes'. HMO licensing is little more than a space/fire/damp standard. BHCC's own profligate spending of vast sums of taxpayers' money on the grimy, soiled, revolting 'temporary, emergency' accommodation HMO/B&B bedsits that are associated with a huge burden of antisocial behaviour, crime, deaths of young people and community disruption is a clear demonstration that licensing does not ensure well managed properties.

- Brighton is an expensive place to live. Rental accommodation is essential option of choice for people within our city. The HMO scheme just serves to push up rent within the sector and to intensify the feeling of victimisation of tenants.
- Bringing conditions in for HMOs will undoubtable raise standards, however it will do nothing to improve standards from non-HMO properties, and the likelihood of any improvement being cost efficient does not seem likely
- But it isn't just HMOs which are the problem. Airbnb places and Holiday Lets rented out to lots of people for weekends for stag weekends and hen weekends are more of a problem than students and sharers. The noise, rubbish and ASB from these weekenders is far worse than the HMOs.
- Good landlords already have good standards and bad landlords will ignore licensing, so conditions will not improve but council will get extra money for doing a job that is not required.
- Good landlords and good letting agents are good regardless of legislation. Bad landlords always manage to slip under the radar and legislation will do little good. Another bugbear is the council demand higher standards from the private sector than they impose on themselves.
- Heating - unlikely that most domestic heating systems will be able to achieve the standards set - i.e. raise the temperature from as low as minus 1 to the temperatures stated. Additional electrical sockets - 4 seems to be more than many bedrooms will have, or need. All of this is only any good if the council has the resources to police the conditions! Otherwise, the proposed extension of requirements for properties to have an HMO could be seen as just a money-making exercise for the council
- How would it improve anything? What is the strategy? Manpower? I thought the government was reducing employees

- I am all for more stringent conditions to ensure that the small minority cannot abuse their position and spoil things for everyone else who is prepared to re-invest in their properties for the good of the tenants and surrounding neighbours
- I am completely opposed to the principal of the additional HMO scheme anywhere in the city. It should be scrapped. It was not about important stuff to do with fire safety. It was more about trivial nonsense. It forced me to install a tiny sink in the toilet as the students couldn't be expected to walk across the landing to the bathroom sink. It forced me to remove nice carpets and fit lino. It forced me to drill a big hole in the kitchen wall so that the existing cooker hood could be changed from recirculating mode to venting outside mode. It forced me to have a heater in the kitchen despite the fridge and cooking being sufficient for warmth; the heater has never been used. So I deeply resent this sort of nanny stateism. I monitor the members of the planning committee and will ensure any supporters of this scheme will be known by any landlords I know and we will vote them off the council at the earliest opportunity.
- I have no problem with the standards but don't think they should apply to small three bedroom properties rented unfurnished, mainly to families
- I provide high quality accommodation but am not sure that the bedroom space requirements can be met in absolutely every case. Also the need for a washbasin in every bedroom could cause a real problem with all the plumbing and waste pipes that have to be routed through the house. Whilst I currently use a number of 10 year smoke alarms on the landing and in the lounge kitchen area I would need clear guidance as to what is acceptable. Also as I currently have a licence I would be looking to get a much cheaper renewal particularly as I have satisfied the current conditions. Finally I have no problem with providing Gas and electric safety certificates
- I think it's a shame that the council uses the poor behaviour of a small percentage of landlords as an excuse to raise funds for the Council during austerity measures. This is just another money-making scheme at the cost of many small and professional landlords who act properly and decently. I would like a public sector pension like many who work at the Council, I have chosen property as my pension instead which provides much needed and sensibly priced rental accommodation for the city, which in turn boosts the local economy. Landlords are not all mean and badly-behaved, I go above and beyond for my client/tenant - please consider the good ones not just the bad ones - as costs continue to be prohibitive, more small and decent landlords will leave the industry, leaving the Council with more social housing to find which they don't want to maintain or build? Why not use some of the millions you make a year from parking to fund new schemes and/or provide new employment within the Council?
- I think the HMO standards are good and sufficient already
- I think the real problem is that the majority of properties are very old with many restrictions as to what you can and can't do to improve, that's why it just gets left in bad condition but due to demands, tenants are having to accept what is available.
- I will comment on some of the aspects. The rest, I consider to be of questionable value
Overcrowding - are there really that many landlords in Brighton & Hove that cause this? Very few. From my experience, overcrowding is mostly caused by tenants sub-letting to friends, or letting friends stay, without ever speaking to the landlord. Licensing will not stop this. Gas is checked every year anyway. Fire safety - the biggest cause of fires is candles Energy efficiency - surely most landlords would by now have good loft and pipe/tank insulation. To go further than this and require walls to be insulated should be a requirement of all properties, not just those in the private sector. Waste etc. - a problem for many properties not just private sectors, Brighton & Hove is a magnet for young multicultural people. They will always "party" etc. These proposed changes will not change their lifestyles. My concern is that if this scheme is brought in, it may lead to landlords selling-up, thus reducing much needed housing stock - particularly at this end of the rental market
- If it's let unfurnished that's up to tenants' tenancy management: please refer this to property managers. As a landlord I liaise constantly but I know that whenever I inspect the rubbish is left

outside. I think -Lewes Road. - there could be more collections. Overcrowding. I have had tenants who have tried to add a boyfriend and girlfriend... crackdown... some landlords would charge extra. Anti-social behaviour is not an issue for landlords, it's an issue for police or for neighbours to bring about summons. I would evict tenants for this, but the government isn't helping with new rules. I spent £500 getting my license last year, and more charges are unfair as this plus changes in tax laws means more rent will be passed on to tenants. I take a pride in my property but as it's a main source of income due to low wages as a teacher/parent meaning a very low pension I keep having to assess if it's worth carrying on. I have had destructive dirty tenants, sneaky smokers and they have cost me a great deal of money. The licensing penalises landlords by charging them extra, and like myself on a tight budget, cannot afford to keep paying 'additional' license fees. I have had brand new fridges put outside in the garden and brought in at the end of tenancy, no deposit refund, numerous burns in a brand new carpet but was ordered to pay back the tenants, I have had rats in the garden because of rubbish left there by tenants, mould growing everywhere because they failed to report a leak and never opened windows. - how about you do addition rubbish collections The 10% allowed for tax has been taken away and mortgage payments not allowed so you will find landlords selling up if you make life too difficult. I am saying that a good house can be reduced to a hole if the tenants don't play their part and there needs to be protection for landlords as well as tenants, the government have taken that away. Licensing is a piece of nonsense which will not change much

- If one part of the building is under HMO, then all of it should be brought up to the same standard.
- If the council doesn't have the resources to prosecute effectively the scheme will be pointless.
- In large HMOs I think licensing is good provided conducted reasonably i.e. with some power of discretion particularly with listed building conversions which are hampered with planning rules. However, to roll this scheme out to multiple flats in blocks would be a complainers' heaven! Spite, vendettas and false accusations would multiply involving multiple Government Departments i.e. causing misery to work all round!
- It will be good for the tenants in a better standard of living as functional issues such as the boiler/utility supply are reasonably straightforward to manage. With regards to the issues of antisocial behaviour and impact to the general residential area, this seems to be harder to manage. Left to managing agents or landlords, it is impossible to resolve. The council need a 24 hour dedicated response team to deal with all aspects of having HMOs; dealing with refuse, antisocial behaviour and noise. Also parking permits should be limited to a reasonable number - based on the typical original number of people the house was built for. I.e. our area it is couples and small families - 2 cars a household max. These houses have been extended into 7 bed HMOs and we have two next door to one another = 14 potential cars = a whole street wiped out.
- It will be good to have more checks on all rental properties for all concerned
- It's well known that Brighton & Hove council allows poor quality accommodation conditions and abuse of tenants including illegal evictions by companies like Baron Homes.
- Landlords of HMOs will not a) look after their tenants properly or b) care a jot about the locals unless forced to. Brighton and Hove have a glut of awful landlords. As a landlord (one property) myself, my overdoing concern is that my property is safe and my tenant considerate. As a parent of a child soon to go to University, I concern myself with safety of HMOs
- Landlords who manage their and managing agents won't abide by the scheme and the properties most at risk will be missed. All the other landlord and managing agents who currently abide by regulations are penalized as a result. The council need to have a better response to complaints and work with agents and landlords to tackle problems, issue fines to tenants rather than targeting landlords all the time.
- Last scheme was officious and didn't stop unscrupulous landlords continuing to rent out substandard housing - money should have been spent on advertising to students and HMO tenants to let them know their rights further fire safety standards should apply to all rented

housing. It's odd that a family with children is less safe than a small HMO.

- Leave the conditions as they were in 2012. The housing team has not had the time to implement them let alone take on an upgraded set of conditions. - The inspectors in 2012 visiting HMO were variable. Landlords often felt that it was a gamble as to which inspector they got, there needs to be more consistency in training plus an easy to use arbitration process. Wash basins in rooms, remove this requirement.
- Licencing has proved not to be effective in the past. The root causes of problems associated with HMO housing are not addressed by imposing more penalties on the landlords. This case has been well presented by the National Landlords Association. The good landlords (which I believe are the majority in Brighton) will be further penalised while the rouges go unpunished.
- Most are covered under legislation and regulations. The proposal is another added layer of bureaucracies and I am very sorry to say revenue generating for the Council. The issue here is the rise of Airbnb which is totally unregulated and related rental income potentially not disclosed. I do not think the Council should roll out a city wide scheme. Perhaps tackle this from closer to source that is the lease should stipulate not for Airbnb, as it is in our building case. This would minimise tom, dick and harry (excuse my expression) to walk through the building for a few days or week stays, posing security risk for local residents. Rental cost is already high in the city; additional cost will most likely be passed onto tenants making it even more expensive for tenants. Perhaps, Council should try to establish a route to locate these Airbnb and privately let landlords to ensure they comply, as those going through reputable managing agents, they ensure that they meet with the standard. One thing comes to mind is, those who have contact with council for benefits, parking permit etc... council can establish if it is owner owned or tenant and next question name of managing agent, if no managing agent, that would mean mostly likely privately managed and this should be flagged with council and council take action to register or what is required. Privately managed mean both tenants are paying less and landlords too, so for the council to slap citywide fee will mean those managed via agent will cost more and those privately managed still remain less and this could potentially drive landlords to go privately and if council does not have ways to tackle this, then the standard could slip, defeating what the council's aim set out in the first place.
- My properties are at or above all the standards enumerated already
- Not always possible to put a wash hand basin in bedrooms.
- Splashback above hand wash basin is not H&S issue - what if shelving or bathroom cabinet is fitted within 300mm? Electric ventilation not necessary in kitchen if windows open.
- The additional licensing extending city wide will mean that tenants who already find it difficult to afford accommodation are going to be pushed into a more limited housing stock. This is a crisis far bigger than the problems of rubbish and noise - which should be an issue much better handled than present by the council, who is understaffed to do so. You will end up with many more homeless people, as rents go up because the accommodation is limited. It is unfair on young people who cannot afford their own home.
- The council already has more than adequate access to rules to enforce good conditions you just need to apply them. All the extra schemes will do is catch the respectable landlords as they are already compliant with the laws and as per the current HMO scheme ignore those less scrupulous landlords. Any such scheme will again just increase costs to the tenants as the landlords will pass the cost on and increase the value of the licensed properties.
- The proposal to include homes of more than 3 people is too small a number as it tends to penalise non commercial landlords like myself who are providing housing for their offspring and are not commercial organisations
- There is poor control on the standard of the private housing sector in general with poorly serviced and maintained property often with many of the buy to let type financed with large loans and no possibility of managing these properties with realistic finance costs.
- There may well be an improvement to some degree but it would depend on where the bar is set.

I contend that < 10% of private rented housing meets the required conditions met by law for such a scheme. For example what constitutes poor condition? What did the government mean and does the council wish to interpret this differently and the two views could be very different.

- This is just another tax to raise about 15m£ - If the council does this most landlords would have to increase rents so the tenants will be worse off
- This seems like nothing more than a revenue raising scheme. Brighton is a great and desirable city to live in. The larger issues are the fact that there isn't enough housing. This scheme will just restrict supply even more and marginalise more people.
- This system appears to overlap the current HMO requirements in the city, the proposed plan is unclear and seems to duplicate the costs and works completed to achieve the licence requirements that have already been in place for several years. I agree that let homes should be governed and checked but the system should not duplicate the works already completed by landlords to achieve the current HMO licence, if the homes have already been inspected, paid for and been granted a licence then why would you re-invent the wheel and start all over again!! The scheme should be applied to all HMOs, yes, but if the houses/flats have already been granted a licence for 5 years then this must be respected by the council, they should not introduce an additional scheme/charge etc. on these properties until the 5 year term is completed. This survey is asking about additional licencing the proposal states: "The proposal is to implement a citywide Additional Licensing Scheme which would apply to HMOs smaller than those to which the mandatory scheme applies. These would be properties of two or more storeys occupied by three or more people who are not from the same family and who share a kitchen, bathroom or toilet" I have more than 3 persons in my flat over more than 2 stories and have already completed the HMO process. Perhaps you understand why I find this proposal confusing. Summary HMO Licencing yes of course, but additional HMO licencing - no if the house has already been inspected.
- What evidence is there that licensing has improved the HMO stock? What evidence is there that the council are not using this scheme as a money making exercise? What evidence is there that all HMO properties were licences during the previous licensing exercise?
- Why are you doing this when my HMO already has exactly what is being proposed? What idiots at the council are wasting funds on a scheme already in place in Hove?
- You will be forcing the "bad" landlords underground, while punishing the "good" landlords, financially, and consequently, pushing the rents up. The money has to come from somewhere.

Local business

- I don't see how charging the licensee will make any difference. Also, if you are only following the national guidelines on energy performance, being EPC of E or better, this doesn't go far enough.
- ❖ As a local business, we always seek to deliver the best quality service to our customers. It is no different for the landlords; this scheme will make them have to do more of that good service. If they do not, then they will be pulled up.
- ❖ As a local business, we support all efforts being made by BHCC to help and support our customers, however, they are off housing wise. Really do hope it provides security and reduces the risks of homelessness.
- ❖ BHCC doing a good job in creating these proposals that are practical, fair, well thought through and worthy of support. Surprised that some aspects of the scheme were not already in place though.
- ❖ Comprehensive. Works in other areas.
- ❖ Excellent proposals, fair to all involved.
- ❖ Excellent proposals. Rented sector essential to the City and it has to be well regulated and fair to all those involved.
- ❖ Fair. Supports rented sector. Should suit all parties involved. Reduces risk of homelessness. Support.

- ❖ Fair. Works well in other parts of the City. Supports rented sector.
- ❖ Fully support efforts to reduce the risks of homelessness and make the rented sector fair and well run.
- ❖ Great proposals that will work and that we support.
- ❖ Helps the rented sector x 2
- ❖ Helps the tenants, landlords and the community.
- ❖ In all our interests to have a fair, well regulated and successful rented sector across the City.
- ❖ Many of our customers are in the rented sector, so we support all efforts to make their housing safe, well run and supported by these types of proposals.
- ❖ Needed. Similar schemes doing well elsewhere. Supports and protects the rented sector.
- ❖ Our business goes well supported by mix of owners and tenants that makes our City a great place to live. We want to see as much done as possible to support the rented sector in both fairness and practicality. These very detailed proposals more than do that.
- ❖ Our customers are why we are here in the Laines in the greatest City in the country. We support all schemes that help our customers, whether they are owners or renters. This scheme will do that, so we strongly support.
- ❖ Rented sector essential to our City. Needs to be fairly regulated - these proposals will do that.
- ❖ Rented sector is huge in our City and it needs to be well run and fair to all of those that are a part of it. The proposals in the scheme will more than take care of that.
- ❖ Rented sector needs to be well regulated to ensure that all those involved are doing their best to be reasonable and fair to each other.
- ❖ Rented sector very important to City, so it is vital that schemes like this are in place. They will ensure fairness between all those involved and give a boost to economy/community. A great piece of PR/advertising to encourage people to come and rent here.
- ❖ Rented sector vital to the City. The proposals will help and sustain it.
- ❖ Seems like a massive amount of new regulations to be imposed on the rented sector. I cannot support that.
- ❖ These are very detailed proposals. Well explained to us by your interviewer. We fully support the proposed scheme. Rented sector very important aspect to housing in the City. It must be well run/managed as well as being fair and taking into account all the participants views and aspirations - the landlord, tenants and BHCC.
- ❖ This area is a real mixture and shows the diversity of the City. Businesses thrive here well supported by the local community and visitors/holiday makers. There are HMOs around and generally speaking it goes well apart from some littering and noise - but this is a City. The proposed scheme is to be warmly welcomed as it will enhance and support the rented sector.
- ❖ This part of the City is vibrant and successful. Most important that we have good rules and regulations for the rented sector. These proposals do just that.
- ❖ Very good. Well thought out. Will be a success.
- ❖ We all want the City and its residents to do well. One way to achieve that is by having a well run and organised rented sector. These excellent proposals provide that.
- ❖ We are a charity shop and do our best to support the local and Citywide community. We think that these BHCC proposals are excellent. Schemes in other areas are going well and this one needs to be adopted ASAP. The fairness and smooth running of the rented sector is vital to the City.
- ❖ We are all for fairness and good rules. This scheme will deliver these.
- ❖ We see the homeless in our area quite often. It has and continues to be a problem despite all the work being done by police/council/individuals. Anything that lessens the chances of being homeless must be supported.
- ❖ We support BHCC in all their efforts to make living in the City as easy as possible for our customers, be they owners or renters. They all matter to us.
- ❖ We, as a local business, support all efforts to support the rented sector in the City. It is vital to

the economy of which we are a part.

- ❖ Well done BHCC. These are excellent proposals that set very high standards for the landlords and give rules and responsibilities to all those involved in the rented sector.
- ❖ Will help the renters

Other

- Could be more specific in certain places about the particular standards
- Cut this megalomaniac empire-building bureaucracy. We're in austerity - there's already lots of legislation to protect private tenants
- Food banks, especially over the last year, have consistently pointed to both the cost and quality of accommodation in the private rented sector as a major factor in food bank use. BHCC's annual city tracker survey also points to high levels of food poverty in the private rented sector. We therefore strongly support this initiative to improve quality of accommodation in the private rented sector. The city wide food poverty action plan, to which the council is a signatory (at <http://bhfood.org.uk/resources>) includes this action which relates to both affordability and quality: 1B.3: Via delivery of the key priorities of the Housing Strategy improving supply, improving quality and improving support- deliver action to increase the affordability of housing, reduce failed tenancies and reduce fuel poverty (food vs fuel pay-off major cause of food poverty)- especially in the private rented sector. The food poverty action plan also emphasises access to adequate cooking and food storage facilities as a means to mitigate the high levels of food poverty in the city. It is very hard to eat well on a budget without basic equipment. We also request, therefore that this opportunity is taken to ensure that cooking facilities are adequate. Currently the city's food poverty action plan includes the following action in relation to social landlords but we suggest this would be an ideal occasion to tackle this issue in relation to the private rented sector, and would therefore request you include something similar it in the new regulations: 3B.3 Encourage registered providers (social landlords) to ensure adequate kitchen provision in refurbishments/ developments (a) appropriate kitchen space (b) appliances to enable budget cooking; e.g. accommodation aimed at single people/couples includes a fridge freezer (rather than a fridge with icebox)
- I can't see the point of the proposed scheme - it does nothing to protect tenants' rights and just gives landlords an additional expense which will inevitably be passed on to the tenant as there is no provision at all for rent regulation.
- My son lives in damp, expensive private rented flat in Brighton. Landlord will not cure damp. My son has arthritis and other medical conditions. These are made worse by damp, cold flat. My son fears, if he complains the landlord will evict him.
- Vaguely worried that the tenant references will lead to the creation of new fees charged to tenants for estate agents processing these references (have had this happen before whilst moving rented properties). I'm not sure if this would still be legal with the new fees legislation. Additionally, I worry that asking for references from previous landlords may make tenants less likely to ask for help from the council when landlords do not fulfil their obligations, for fear that the landlord may make moving more difficult for them in future. Besides these concerns, the proposed conditions look excellent. Particularly the adequate ventilation in bathroom areas and proper provisions for equipment in kitchens.

Not stated

- There has been no improvement in my area in the standard of properties - bad landlords are still bad landlords and bad tenants are still messing up properties. The existing licencing is expensive and ineffective - I see no evidence that extending it would meet your professed aims.

5a. The council is proposing that the scheme will last for five years. If you think the scheme should be shorter please let us know why

Home owner

- 3 years would be better as if it is not working the sooner it can be rectified the better.
- 5 years seems about right and then review how it is working in case any 'tweaking' is required. A similar scheme should be applied to landlords letting out properties as Party Houses, as the same considerations apply.
- A yearly inspection is needed as students will have short lets, also yearly inspections will make sure that the standards are kept.
- As I already have some HMOs I do not think it is right that people like me should pay the increased amount, this should be for new HMOs. Mine should be a renewal fee
- Buildings can deteriorate rapidly in a couple of years, if badly maintained by either the landlord or the tenants, and I think it would be sensible to have a shorter period between licensing inspections.
- Do not agree with the scheme.
- Does it mean that if a landlord is seen as a 'good landlord' it is assumed that he will remain good for those five years without being checked out? If so, that is alarming!
- Have you got the manpower to enforce it?
- I agree the scheme should last for 5 years and I hope this will include re-inspections during this period.
- I believe a 5 year duration is appropriate
- I believe you will know in under 5 years whether or not your scheme is working. In which case, if it is not working you will simply delay the real solution to the actual problem and cause much more suffering.
- I hope the scheme lasts longer than this
- I recommend 3 years: This may promote more vigour of the issues which licensing intends to achieve. Five years is long enough for deterioration and landlords ignoring standards; especially the impact to neighbourhood..!
- I think it should be longer
- I think it should run for 5 years first and then be reviewed. If you find that landlords are consistently falling short of minimum standards set by their licence and fail to comply, perhaps these "bad" landlords could be put on shorter licenses. Good, compliant and thoughtful landlords should remain on 5 years. You could operate a 3 strike rule - reduced to 3 year licence, yearly licence and then disbarred.
- I think the scheme should be ongoing in order to ensure permanent tenant protection.
- I think the scheme should be shorter then problems should be able to be dealt with quicker.
- I want you to ask me how long a license should last. I want you to ask me if those impacted should be consulted about new and renewal license requests and if we should be allowed to contest the HMO license. I want you to ask me how many HMOs should be allowed within a 200 house street. If you are implementing this scheme for my benefit then these are the questions I want to you to ask me. I wanted you to deliver a leaflet through my door 3 weeks ago so I had a chance to find where you have buried, if published at all, the information I need that you are not giving me.
- If its shorter the council will charge with greater frequency - so no.
- If things need to change this is too long a timescale.
- It should be indefinite.
- Longer
- Longer - permanent
- Needs five years.
- No more HMOs

- Occupants in Student Lets change every year so residents should not be forced to wait 5 years.
- Please do not try to compare responsible homeowners who rent a room or two in their own homes to greedy, sometimes irresponsible wealthy landlords who do not live on site.
- Reducing the length of the scheme would allow it to be modified - and provide more leverage on landlords and managing agents.
- Residents have had enough disruption to their lives
- Shorter - three years at most. A lot of neglect of property and standards can happen in five years.
- The scheme should be less than 5 years as it needs to be reviewed after 2 years. Accommodation can deteriorate very quickly and a property that is suitable in 2017 can be an infested tip by 2021. Properties need to be subject to shorter review periods as this is the only way to ensure that tenants are living in suitable accommodation and we are not building a city of slum lords.
- The scheme should not be introduced, this is a leading question.
- Three years
- Waste of time - more interference in the lives of citizens by incompetent bureaucrats.
- Why are these charges so high? Clearly another income generating idea by the council that does not address the issues of housing need in Brighton and Hove.
- Yes - it definitely should be shorter - maybe every three years. HMO landlords make a huge amount of money from their properties and in the case of student HMOs there is no council tax paid by anyone on these properties. Landlords also do not pay any form of business rates and yet they are obviously running businesses. I would also argue that the fees should be higher but the council will need to regulate the rents so that costs are not immediately just passed on to the tenants in the form of higher rents.
- Yes. Who wants to be tied up in a contract that doesn't work for them?
- You would need to ensure the revenue raised is used for the intended purpose, not just another tax rise by the overspending council
- ❖ About right
- ❖ No idea
- ❖ No opinion x 14
- ❖ Perhaps after, say, three years, there might be an opportunity to take stock of how the scheme is performing with a view to tweaking it where it is necessary.
- ❖ Perhaps three years and then take a look?
- ❖ Three years and some benchmarking.
- ❖ Three years and then carry out some research to benchmark how the scheme is going.
- ❖ Three years and then lets take a look at how things are going.
- ❖ Three years and then perhaps some benchmarking/interviews to check out how the scheme is doing.
- ❖ Three years then benchmark.
- ❖ Three years then carry out more research.
- ❖ Three years then some benchmarking?
- ❖ Three years then take a look
- ❖ Three years, then take a look at how the scheme is doing.
- ❖ Two years and then some benchmarking.
- ❖ Two years, then find out how it is working in practice.
- ❖ Two years, then take a look at what is happening.

Private rented tenant in Brighton & Hove

- A lot can change in 5 years!
- Because the cost will be passed on to the tenant with little or no direct benefit to them I think it should not be implemented

- I do not think you should go ahead with this scheme at all.
- I don't agree with the Additional Licencing scheme, I think it will be counter productive. If the Council does go ahead with the scheme it really should be reduced in length of time.
- In this day and age people just cannot afford any increase in any part of their life! If my rent goes up who will pay for it? Where I live it is not broken so doesn't need fixing.
- It should be longer, not shorter.
- It should not be implemented at all because it will result in an increase in my rent and no benefit, only to the council
- It shouldn't proceed in going ahead in the first place.
- No need for the scheme
- No, if anything longer
- Ok as long as there is a mechanism to inspect and revoke at least annually. Most tenancies are 12 month Assured Shorthold.
- Shorter to see what impact they have on rents - many of these costs are passed onto tenants who are already very squeezed. Properties with 3 or less occupants should be exempt.
- Should be shorter to test if it works and that it does not cause an increase of rent to the tenants.
- The scheme should be indefinite.
- The scheme should never be introduced
- The scheme should not be put in place at all, no matter for how long!! Most of us can barely afford to pay rents as well as feed ourselves without having extra fees put on us!
- The scheme will inevitably become permanent since it is effectively being put in place as a means of generating income and not as a mechanism to improve general living standards across the city. The scheme should not be implemented under the guise of improving services and standards of living.
- These costs will be passed on to tenants who can ill afford the increase. I understand the need to control bad landlords but why should the tenants of good landlords suffer? I think that there needs to be a rethink.
- Too long.
- Why is it only 5 years? Why not longer?
- ❖ No opinion x 6
- ❖ Three years then benchmark how well it is going.
- ❖ Three years then check how it is going?
- ❖ Three years then check out how the scheme is doing.
- ❖ Three years then see it is panning out.
- ❖ Three years then take a look to see how well it is going.
- ❖ Three years, then check the outcomes and how the scheme is doing.
- ❖ Three years, then take a look again.
- ❖ Two years and carry out more research on the outcomes.
- ❖ Two years then check how we are doing.
- ❖ Two years then check out how it is going.
- ❖ Two years then some more research to check how it is getting on.
- ❖ Two years, then check how the scheme is doing?

Social housing tenant in Brighton & Hove

- No comments
- ❖ No idea
- ❖ No opinion x 2
- ❖ No thoughts
- ❖ Three years and then check the results.
- ❖ Three years then check it out to how it is going?
- ❖ Three years, then check out how it is going.

- ❖ Two years and check how it is progressing.
- ❖ Two years and then take a look at what is going well and what is not.
- ❖ Two years, then more research to see the scheme is working out in practice.
- ❖ Two years, then some checking up on how it is going.

Live in a shared home or HMO

- Don't believe the scheme will be beneficial to me as my landlord provides a good service and I don't want my rent to increase because of the scheme.
- I think that any shorter and the full benefits of such a scheme might not have time to come to fruition.
- ❖ Maybe a couple of years and then see how the scheme is going?
- ❖ No idea
- ❖ No opinion x 6
- ❖ Three years and then some benchmarking.
- ❖ Three years and then take a look to see how well it is doing.
- ❖ Three years then benchmark it.
- ❖ Three years, then check to see how it is going.
- ❖ Three years, then some more research to see how it is going and what needs to be tweaked.
- ❖ Three years, then take a look x 2
- ❖ Two years, then check it out.
- ❖ Two years, then let's see how it is going.

Letting/ managing agent

- Don't think it should be shorter
- Smaller fees but much shorter length

Landlord of property in Brighton & Hove

- 5 years is a reasonable amount of time. If shorter the renewal costs may increase rents.
- 5 years is fine
- 5 years is good
- 5 years seems reasonable.
- Again the landlord is penalised!!! Which means that the rents will go up?
- An initial period of 1-2 years to see if it makes a difference. If not, abandon it. If it does work, then go to 5 years
- Good that fee reduced for prompt payment but fee could be much reduced if landlords complete self-certification from a check list online. Form could remind landlords about specific HHSRS standards if they gave wrong answers on online form. Landlords who sell up during the 5 years should be able to get some returned.
- I don't think it should be brought in at all. It seems to me it's just another way of the council making money.
- It should be longer, as to pay hundreds of pounds for something that only lasts 5 years is again, just profiteering from the situation.
- It should be shorter and cheaper a lot can happen and standards can slip over 5 years. Why not have a cheaper one that gets renewed every year if you're looking to improve standards. Don't forget it's the tenants who will have to pay for the scheme as landlords will have to increase rents to cover their losses.
- It will only be effective if there are proper, regular, fair, inspections
- Licensing will not support landlords in any way. It will only deter landlords and reduce housing units available. To Rent Q. why would anyone want the 'hassle'? Asking landlords to join a landlords association for £70 per annum each would improve standard and keep all landlords up to date. (But you do not offer this!) . Whether your bad proposals are for 5 years or 2 years =

irrelevant

- Needs testing over shorter period as this appears to be a money making venture for the council. It needs trying out, especially as the fees are extremely high
- No - 5 years is as good as any other choice
- No - but it is not clear whether this means that every five years the Council will have another full inspection (at a similar cost), or whether the previous inspection is just allowed to roll over.
- No it should be permanent
- Not shorter fees are excessive as it is
- Scrap the whole scheme, its about petty nonsense as it does not focus on important fire safety
- Should be longer
- Start the scheme after the existing HMO scheme. 5 years is fine
- Tackle private landlords and tenants going to private landlords...go to the source. Those that are managed via managing agents are already addressing this and strict on number of occupants and standards!
- The council have not finished the licensing from November 2012, if anything it should be longer than 5 years.
- The fee should be an annual one so that properties that come onto the rental market half way through the scheme do not have to pay the full 5yr fee.
- The fees are much higher than some other local authorities and BHCC provides no transparency or auditable figures to demonstrate that this is not another revenue raising initiative being instituted by stealth. BHCC's profligate spending on slum HMO accommodation should cease before seeking to extract additional monies from landlords who offer good quality accommodation.
- The housing crisis is going to continue for at least 5 years. We need other ways of dealing with rental standards which do not require planning permission and are much more responsive to the individual houses and landlords to blame for bad standards, rather than penalising all landlords and tenants.
- The schemes should not be introduced at all as the cost of licences will be added to rents and will negate any perceived benefits. The reason for introducing these schemes is simply not correct. The city is not full of poor properties or bad landlords.
- This should be an annual fee - the rents will be ample on these properties. Each property should be reviewed annually or every two years not five.
- This whole thing is unfair. If I had seen this a few weeks ago I would have cancelled the improvements I am making to the house. I am sure other small landlords would agree
- Why 5 years? Why not have these standards all the time, it doesn't make sense to stop and start them. We heard of landlords in Lewes Road/Elm Grove who simply rented out their substandard houses to families and said they would go back to renting to students when the 5 years was up - therefore they could enjoy the rent increases that came from the previous scheme without having to do any of the work. By the way - due to the last scheme being implemented HMO house prices rose considerable as did rents - as a landlord we really benefited from the scheme. Be really clear that rent and house prices will increase.

Local business

- I don't see the purpose or effectiveness of the scheme at all. There should be a penalty for noncompliance with the regulation, not a license fee. I also don't think the Council is the right body to oversee the scheme.
- ❖ Four years and then take a look at how it is going.
- ❖ I think after, say, 3 years, you could carry out some more research to ascertain how well the scheme is going and potentially tweak any aspects that need it.
- ❖ No opinion x 4
- ❖ Three years and check how we are doing.

- ❖ Three years and then check how it is working.
- ❖ Three years, then check out how the scheme is doing.
- ❖ Three years, then some benchmarking of how the scheme is going.
- ❖ Two years, then more research?

Other

- Landlords will need to be checked every year
- Quite a lot can go wrong in a house in that time, but then the cost of having a shorter scheme is also a consideration. But in house where there is a high turnover e.g. student homes there should be early inspections. I speak as a parent of a child at university elsewhere and am aware of the problem of landlords not always dealing with problems properly!
- Seems reasonable
- There should not even be any such scheme taxpayers need their Council Tax spent more wisely and low-income tenants can't afford the costs of such a luxury scheme!

Not stated

- No comments

5c. Please provide any additional comments to explain your response on the proposed fee structure

Home owner

- A prompted renewal fee should be heavily penalised, this is the only way to ensure that landlords to not take advantage of the system. An additional £140 is pointless as someone who is prepared to have an HMO without a proper license will not have much impact on their income from the property. Also, there needs to be a fee for party houses, which you have not included in any of the proposals. Fees need to be considerably higher across the board, what you are proposing is far too low and these need to reflect the business opportunity for the landlord.
- Add fee when council needs to deal with any problem at a property
- Any fee will be passed onto the tenants
- Such a fee structure should also be applied where houses are let out as Party Houses.
- Fee should be based on full cost recovery for council or a percentage (7.5 %?) of gross rental income, whichever is greater.
- Fee structure needs to cover the cost of implementation - I assume the sums are correct!
- Fees much too high. Will lead to increase in rents
- Fine should be introduced for landlords who don't deal with Anti Social Behaviour on their property
- How have these fees been established? Are these fees based on council's time to carry out the work required? What is the actual cost per property to manage licensing? Why is the cost greater with multiple tenants? How can the public have confidence that this is not a revenue generating exercise with the effect of costs being passed onto tenants?
- I agree that fees are required to help fund inspections/compliance checks.
- I agree that the fees need to cover the council's costs, but unscrupulous landlords will try to avoid paying what they owe, others may decide to pull out of PRS. Have you examined the fee structure for any unintended consequences, such as a reduction in the number of PRS properties available, especially for students and other young adults?
- I agree with the idea of having a standard fee, prompted fee and renewal fee. However I strongly disagree with how the sliding scale is set with regards to numbers of people. The fee should not be proportionally reduced as the number of occupiers increases! This will encourage landlords to have fewer properties with more people per property. HMOs of 11-12 people are more than twice as problematic as HMOs of 2-5 people and the fee structure should reflect this. I suggest

lowering the fees for 2-5 from where they currently are, keeping 6-8 as it is, and raising those for 9-10 and 11-12 (I assume this is what is meant: the figures in the tables say 9-11 and 10-12!) with an extra £50 per person for over this amount.

- I am concerned about how they will be passed on to tenants.
- I believe that if a landlord is making money from renting, she or he should be obliged by law not only to manage the property well - thus spending some of the rental proceeds on management - but also to contribute to an enforcement scheme to prevent abuse.
- I don't know enough about the costs involved for admin to comment on the actual amounts proposed, although these seem reasonable. I am very supportive of charging more for landlords who need to be prompted, as this will hopefully encourage them to register.
- I think an open and honest break down of how the fee will be put to use would encourage good will and prompt payment.
- I think that in Hanover and Elm Grove there should be a reduction of licenses issued and that more should be done to ensure that all shared property's have licenses as half of them haven't
- I think this is a great idea, the fees are commensurate to the weight of responsibility landlords have for the health and wellbeing of their tenants. My only concern would be that there be some mechanism for detecting where landlords/letting agents are simply passing on these fees to tenants by way of rent increases etc. Not sure how this could be achieved but I think this needs some serious thought.
- I think you need an initial registration fee for new scheme incorporating first inspection cost, and then a lesser yearly re-inspection fee to ensure ongoing compliance and sufficiently resource the scheme.
- I'd want to be sure that the fees involved were proportionate to the costs of managing the license.
- If a person can evidence they are a good landlord potentially this cost can be reduced and less oversight
- If the fee is prompted it should be considerably more so that it encourages good practice, and proactive landlords are rewarded for complying
- It seems unbelievably expensive if its annual - does the fee last 5 years? If so it's not so bad!
- It was not clear how long this fee lasted. If 5 years without further checks I would not consider that would ensure maintenance of standards. I was also unclear - though perhaps I missed this - as to whether if the ownership changed the new landlord would have to reapply.
- It will not stop the noise
- It will only work as long as the fees collected cover the cost of the investigations necessary to make it viable and realistic
- It would be a concern if landlords simply pass these fees on to their tenants, which seems a significant risk. This would do nothing to improve conditions or make the landlord more responsible.
- It's not about money; it's about the willingness, about neighbourliness, about having standards and caring for people. All of which the council is actively eroding due to policies that make people think they deserve everything under the sun for nothing, that they are untouchable if they exhibit ASB because of their human rights (which come above those of their good neighbours) and the late night licensing that creates alcohol problems and drug problems across the city.
- My feeling is fees should be much higher to reflect the buildings usage. For a party house sleeping 10 or more a fee should be commensurate with the rental value. Example: income expected from 80% occupancy of 3/4 bed party house is £76,000 p.a. I would suggest fees in and around equivalent business rates. £20,000 to £30,000 p.a.
- Not fair on homeowners who live in the property and rent one or two rooms out just to make a living
- The fee is a minor expense compared to the monthly income from letting.

- The fee is too low and will not replace the council currently being lost to student HMOs
- The fee should also include for the loss of government grants for council tax on student housing.
- The fee should reflect the cost of providing the license. If it doesn't then it's probably unfair.
- The fee structure is important as it sets a standard by which we are saying this is important and significant which in turn demands a cost to administrate and enforce.
- The fees appear to be very low for a five year period.
- The fees should start at £1,000
- The landlord in front of me makes over £4000 a month in rent. You think making him pay a paltry £1170 fee is going to make him give a damn about the disgusting rubbish his students leave all over the pavement? No. Your fees are simply ridiculous, you're loosing millions due to lack of council tax yet you're charging ridiculously low licensing fees to landlords making thousands of pounds every month. Makes absolutely no sense and encourages more and more people to convert family homes to HMOs meaning you're again contributing to the family housing shortfall in Brighton.
- The renewal fee should be as much as a standard first time fee.
- There is no information about how the scheme is to be enforced. My experience is that at the moment little evidence of enforcement.
- These are high fees and will simply get passed onto the tenants
- These landlords are making huge profits from their tenants who have little other housing options available to them. The landlords are changing the character of our city and do not care about the consequences on the local population.
- Think the fees should be higher than stated for over 6 tenants
- This scheme has not taken into account bad tenants. Good landlords, and there are many, are being penalised again.
- This scheme if introduced will generate additional income for the council, and give officers a list of private landlords which it doesn't have at the moment.
- Why are Party Houses not included? Why doesn't the Council investigate the landlords/owners of the thousands of privately rented flats and houses that are used for party houses, but are not classed as HMOs, and charge them too?
- You squeeze landlords they will just pass it on to the tenants; the cost of renting is the problem.
- ❖ £100 pa seems a good deal
- ❖ A reasonable amount to pay for the landlords.
- ❖ Amount is fair and reasonable.
- ❖ Assume it covers all the costs?
- ❖ Assume that all costs involved are covered by the fee?
- ❖ Does it cover all BHCC costs?
- ❖ Fair x 23
- ❖ Fair amount to pay.
- ❖ Fair and reasonable amount.
- ❖ Fair enough
- ❖ Fine if it covers the costs.
- ❖ Good value for money
- ❖ Good value for money.
- ❖ I know that you will have worked it all out and come to the amount appropriately.
- ❖ If all costs are covered, then very well.
- ❖ If costs are covered, then fine.
- ❖ If it covers the costs, then fair enough.
- ❖ If it covers the costs, then fine.
- ❖ If it covers the costs, then fine.
- ❖ If it covers the costs.
- ❖ It sounds about right.

- ❖ Not a lot really. Will it cover all the costs for BHCC though?
- ❖ Reasonable x 5
- ❖ Reasonable amount in the time frame.
- ❖ Reasonable annual amount to pay.
- ❖ Seems a good and fair deal.
- ❖ Seems a very reasonable amount. Does it really cover all the costs?
- ❖ Seems fair
- ❖ Seems fair. Assume it covers all costs?
- ❖ Seems quite a small amount but assume it covers all the costs?
- ❖ Seems reasonable and fair.
- ❖ Seems reasonable and fair.
- ❖ Seems very fair and reasonable.
- ❖ Seems very fair.
- ❖ Somebody has to pay. It seems a very reasonable deal though.
- ❖ Someone has to pay.
- ❖ Sounds a fair price to me.
- ❖ Sounds a good deal to me
- ❖ Sounds fair x 4
- ❖ Sounds reasonable and fair.
- ❖ Very fair
- ❖ Very reasonable.
- ❖ Very reasonably priced. Not too onerous for landlords.

Private rented tenant in Brighton & Hove

- All fees will be passed on to the tenants and will result in no benefit
- Because it will only cost the poor i.e. the tenant money only to reach the greed of the council as the landlord will only pass the cost down to the poor tenant
- Considering the high fees many renters have to pay please can it be ensured that fees don't get passed onto tenants.
- I do not know enough about renting out properties to comment fairly on whether this scheme is well priced
- I have a very good private landlord. If you make the charges for licensing my landlord will be forced to increase my rent
- I think it is just more money we as tenant's will have to pay!
- I think that too many landlords currently do not take their responsibilities seriously. I think these charges will ensure that they do. It's time these landlords stopped thinking only of the 'quick buck' and started to see their responsibilities.
- I would personally charge them a lot more but am also aware that most would either pass the charge on to the tenants, or just claim it as a business expense; or both.
- Important that these fees are not passed down to tenants in any way.
- It will affect the residents living in these premises, as the landlord will increase their rent to cover the costs. Most people living in HMOs are receiving housing benefit, so therefore that cost will be increased. Thereby leaving the council taking the cost of this proposed structure from themselves. Therefore the landlord remains unaffected but the tenants struggle with increased rent and may need further government help which in turn affect every local resident when it comes to taxes. The scheme is intended for many reasons including to change the way landlords of HMOs deal with their properties, yet all it will do is harm the residents and council's pockets, the landlord remains laughing!! I can stress my point further than certain rogue landlords need to be pin-pointed, possibly publicly ashamed but certainly dealt with directly without affect the benefits of everybody else.
- It will cause rents to rise

- These costs will be passed on to tenants who can ill afford the increase. I understand the need to control bad landlords but why should the tenants of good landlords suffer? I think that there needs to be a rethink.
- Should be based on property size, value and the number of tenants.
- The fee will be added to the tenants rent...some tenants are already in receipt of housing benefit....who at the moment have capped the limit of a property many tenants are having to pay excess out of their welfare benefit and if this scheme is introduced would have to find the cost of the licence....my landlord who is a major landlord in the city have told me the increase would be £2 per week. On my rent
- The majority of private landlords are fair and treat all tenants well regarding repairs etc. required in their properties. The council should concentrate on sorting their own properties out which are in bad states, rather than picking on privately owned properties....our landlords treat us well enough!!
- There are a number of private landlords (including my old one) who will simply sell their investment property rather than pay this fee or jump through the endless application hoops. This will result in a shortage of rental properties, and given house prices in Brighton & Hove where are people on minimal or minimum wages supposed to live?
- There needs to be a categorical clause that these charges aren't passed on to the tenants
- This proposed fee structure will increase rents in an area of the country where the rents are already some of the highest in the country.
- ❖ Appropriate
- ❖ Are we sure it covers all the BHCC costs? £100 or thereabouts per year does not sound a lot of money.
- ❖ Assume that it covers all the costs involved, so that is fine.
- ❖ Fair x 10
- ❖ Fair and reasonable.
- ❖ Good value for money.
- ❖ Good value.
- ❖ I think the fee structure is very fair and transparent.
- ❖ If all the costs involved over the 5 years are covered, then fine.
- ❖ It is reasonable and fair.
- ❖ Pitched about right.
- ❖ Reasonable amount.
- ❖ Seems a reasonable cost
- ❖ Sounds a good deal
- ❖ Sounds fair x 3
- ❖ Very reasonable x 2

Social housing tenant in Brighton & Hove

- The fee structure will more likely lead to compliance and better all round experience
- The landlords are making a lot of money from their tenants and this fee should be paid so that they can be properly regulated
- ❖ £100 a year or so is not a lot.
- ❖ All sounds very reasonable.
- ❖ Does it cover ALL the costs?
- ❖ Fair x 13
- ❖ Good value x 3
- ❖ Good value for money x 2
- ❖ I am sure that you will have done your sums and arrived at the correct cost.
- ❖ If it covers the costs, then fine with that.
- ❖ Pitched about right.

- ❖ Reasonable x 2
- ❖ Reasonable amount to have to pay.
- ❖ Seems a very reasonable amount
- ❖ Seems good value. Does it cover everything?
- ❖ Sounds fair
- ❖ Very fair.
- ❖ Very reasonable
- ❖ Very reasonable amount given all the time it must have taken to write out and check through all the points in the proposal.
- ❖ Will it cover all BHCC costs?
- ❖ Will that cover all the costs? Seems very reasonable.

Live in a shared home or HMO

- It's most likely that 2 bedroom properties are let to 4 people. However landlords do get by this by having just 2 people on the tenancy agreement but openly knowing they are renting to more than 2. Landlords should not be able to increase fees for multi occupancies to cover their licencing
- What would be the implications of linking the fee to that of the rental charge? Might that help mitigate the risk of unscrupulous landlords whacking the rent straight up?
- ❖ A reasonable amount x 2
- ❖ All seems fair and reasonable to me.
- ❖ As explained, sounds reasonable and fair.
- ❖ Fair x 20
- ❖ Fee structure seems fair.
- ❖ Good value.
- ❖ If it covers all the costs.
- ❖ If it covers the costs, then fine.
- ❖ If it covers the costs.
- ❖ It seems quite reasonable to me.
- ❖ Reasonable
- ❖ Reasonable amount
- ❖ Reasonable.
- ❖ Seems fair x 3
- ❖ Somebody has to pay it and landlords do on this occasion.
- ❖ Sounds a fair amount. Will it cover all the costs?
- ❖ Sounds a good deal
- ❖ Sounds fair to me x 4
- ❖ Value for money
- ❖ Very reasonable.
- ❖ Will it cover all costs?

Letting/ managing agent

- I think that if this is the proposed costs to run a scheme at no profit, its an extremely expensive way of singling out a low % of landlords at the expense of others and shows no creative thinking to find an efficient solution

Landlord of property in Brighton & Hove

- The time taken to inspect and license a property is in no way directly proportional to the number of people who live there. Provide a full, open, transparent financial analysis that justifies such an implausible charging structure. Again the evasiveness and opaqueness If BHCC leaves many questions unanswered.

- 2 tenants is not an HMO. Unless there are teeth behind this licence then these are only empty fees passed onto tenants. If you believe this scheme to be of benefit to tenants, then provide it for free; prove its worth to tenants (who suffer the most from exploitation from HMOs). If it makes improvements for tenants, then it is value. Don't be mistaken - tenants will pay. Other problems with HMOs are the matter for other departments e.g. environment
- A standard initial fee, a higher fee for landlords who have to be chased or ignore their responsibilities. A renewal fee is fair.
- Adding further costs to a sector that has and continue to be made the villain is not the answer. It will lead to increased rents and restricted supply
- All fees will be passed on to tenants and most struggle with rents already. The council will be paying its self because of higher claims with help for rent
- All fees will be passed on to the tenant or will encourage illegal landlords. As long as everyone understands this I have no problem with the scheme. It is essential sufficient, sensible resources are put into policing the system i.e. not a bureaucratic process-driven nonsense.
- What evidence is there that licensing has improved the HMO stock? What evidence is there that the council are not using this scheme as a money making exercise? What evidence is there that all HMO properties were licences during the previous licensing exercise?
- Far too costly
- Fees are excessive, full stop.
- Fees are too high - this should not be used as an opportunity to raise revenue at the expense of landlords (landlords could be taking on additional expense in order to comply with the requirements). Should be same fee irrespective of single or multiple tenancies - what if the tenancy arrangement changes during course of the licence period (it could change several times)?
- For the work undertaken by the council, the fee is excessive. Plenty of other councils manage to charge a lot less than this for the same service.
- Good landlords will want to apply high standards.
- I agree on the understanding that my licence needs to be renewed just once per five years and that will cost me £430.
- I am a landlord that already has 7 houses that have a full license. £680 to renew that license is very expensive. For those of us that have met all the past requirements there should be a substantial discount.
- I assume that this is as well as the original HMO fee £650, but the proposal is not clear
- I do not believe that imposing fees will reduce the problems associated with HMOs.
- I do not consider that this represents the cost of the council operating the HMO scheme. The fees should be lower; otherwise this will be seen as another money-making scheme for the council, rather than an attempt to improve standards of tenanted properties.
- I do not understand how this idea will improve anything except for the council to make more money: look at what happen in London a few weeks ago!
- I feel that the fee structure should make landlords responsible by having a large penalty. The penalty is at a rate which would mean that this most would try it on and not register.
- I have already paid £500. I cried when I saw this! That's almost whole months rent. If this comes in I will be putting my small house up for sale. Outrageous for small landlords. I will not be able to let to 3 students in future why don't you just make rules clear, have an inspection scheme and fine landlords who don't comply. My renewal fee is the same as I have already paid...if that's annually it goes on the rent.
- I have lived in HMOs for years and the only way to enforce better living standards for those in social housing or poorer neighbourhoods (those most at risk) is to actually provide a legal mechanism whereby genuinely unsafe/unacceptable living standards is actually enforced. The proposal, in my view, is likely to just create more bureaucracy (of which there is already too much) which serves no one.

- I think it is just another way for the council to make money and it is overpriced. Good landlords are going to be penalised for bad landlords. Rents will rise to cover the cost and tenants will find it even more expensive to live in the city. I have been a landlord for over 20 years and have only had one occasion where tenants were making too much noise. The environment health department came out and the tenants were asked to leave.
- I think the renewal fee should be less - after all we went through the vetting process in 2012 and have actually maintained/improved the properties over time and satisfied the various conditions and certification demands which should mean that significantly less effort is required when the renewal is done.
- It is important that this is not just a money making structure.
- It is particularly unhelpful to have a difference in fee charges between say six people under one tenancy and six people under individual tenancies. This leads to choices for the duration of five years, no flexibility where six people either way all make as much mess and noise etc... A renewal fee that is lower is fairer, but that should include all the current HMO license holders.
- Just another tax!
- Many landlords are individuals, often self employed, who have one flat that they rent out with the aim of having a small pension. More and more costs are no longer allowable as expenses (unless you are a big company landlord). Small landlords are being squeezed but it is usually the bigger HMOs that visibly have these problems. Maybe the scheme should take account of the number of properties owned by the landlord, with more of the charges being levied on the larger landlords, where the problems mostly seem to occur. These costs will have to be passed on, increasing rents further. I suspect a black market of unlicensed properties will develop.
- Not sure that repeat inspections should cost the same as the original full investigation - could you have a discount for subsequent inspections every five years?
- Originally the scheme costNothing. Why is the fee still rising every time. I can only get the fee back by increasing the tenants' rent = is that understood by the council? They are forcing private sector rents up
- I think it's a shame that the council uses the poor behaviour of a small percentage of landlords as an excuse to raise funds for the Council during austerity measures. This is just another money-making scheme at the cost of many small and professional landlords who act properly and decently. I would like a public sector pension like many who work at the Council, I have chosen property as my pension instead which provides much needed and sensibly priced rental accommodation for the city, which in turn boosts the local economy. Landlords are not all mean and badly-behaved, I go above and beyond for my client/tenant - please consider the good ones not just the bad ones - as costs continue to be prohibitive, more small and decent landlords will leave the industry, leaving the Council with more social housing to find which they don't want to maintain or build? Why not use some of the millions you make a year from parking to fund new schemes and/or provide new employment within the Council? it is not up to good landlords to fund council budgets.
- Relating the fees to the input required by the Council is broadly fair.
- Renewal fees should be lower if there have been no serious issues in previous period. A discount should be applied for members of Landlord associations. Renewing licenses should also have the option for paying by instalments, if the system has to continue!
- Seems fair and should weed out any rogue operators
- Should be flat fee for all HMO sizes as council work very similar irrespective of size of HMO. Landlords who sell up during the 5 years should be able to get some returned.
- The £670 for a three tenant house is far too high compared to the £790 for a 10 -12 tenant house. There will be much more income to cover it from the larger house and, I suspect that the larger house will require a lot more of your time and attract many more complaints than a three bedroom property rented by a family.
- The cost of the proposed fees would need to be passed onto our tenants who are very happy

with the excellent accommodation and service that we provide them.

- The council might consider a smaller part fee when the application is made and the balance once an inspection date is fixed. It's not fair to get the whole fee up front when there could be a significant delay on inspection and the council has done nothing at the initial stage to justify charging a large fee.
- The fee is too high for small properties as it is more than 50% charged to largest properties which are more likely to be commercially run on profit basis. Fees will just be passed on to tenants making rents proportionally higher for tenants in smaller properties
- The fee will make it more financially difficult for all involved.
- The fees are extortionate. (Obviously) plus the public have not been advised of what Brighton & Hove council is planning this bureaucratic extravaganza. How many millions per annum? Please. The result of such an increase would be 1) deferred improvement projects 2) increased rents for tenants. But Brighton & Hove ideas of reductions are totally miserly and unhelpful. There should be 100% reductions on all licences for member of respectable landlord associations, e.g. southern landlords, the RLA or the NLA. To be a member itself denotes taking things seriously and if all landlords are members then they could be expelled for bad conduct! (Or suspended). This could remove the onus (i.e. work) for the council. (The associations would do the work for you for nothing!)
- The fees are too expensive for a half hour visit to the house and to get sent a few forms. The scheme is supposed to be non-profit so why is it so expensive?
- The figure is too high. It will lead to tenants having to pay increased rents. If it comes in, it should be much lower, say starting at £150. That way, landlords would not feel obliged to increase rents
- The level of fees is extortionate. The consultation says 30,000 homes will be affected, each paying say £600 = £18,000,000!!!! 18 million pounds - so 300 people are going to be recruited on an average salary of £30,000 plus a further £9 million to run the scheme. You have to be joking. How can you possibly justify this? It is purely and simply a money making exercise for a cash strapped council. Really unbelievable and completely unjustifiable
- The overall cost £13,500,000 is not justified, as the scheme itself appears unjustified - taking money from landlords (tenants through increased rents) appears to meet political objectives and not poor management / condition of properties.
- The renewal fee is too high. Initial inspection should ensure the HMO complies with your regulations, so the renewal should be straightforward.
- These fees are high which will increase rents for tenants
- This HMO fee is just an expensive tax on landlords that will drive up rents so that only rich students will be able to live here
- This is a money-making scam and you know it!!!! Small SFD units should not need to be licenced.
- Too expensive. I agree with the standard and prompted difference, the prompted fee could be higher but the standard fee is too high in my opinion.
- Too high for smaller properties
- Whilst this may put off careless landlords, it will also put off small, personal-service landlords, and favour large enterprises who are not known for their customer care. I'd prefer to see a performance-based scale where tenant experience could affect the price charged. It might cost more to implement, but it would be popular, fair, and less likely to price out small local business. The latter are vital to a sustainable industry and to community in Brighton.
- Why are you grouping up to 6 people in one category? Better to tie it in with the additional planning requirements for 7 people. I see very little benefit to tenants, to landlords or to local residents from charging fees for a license. Instead think about a charging mechanism to pick up additional rubbish, to deal with noise disturbance etc. if the landlord does not deal with this effectively. Some of the 'problems' in the City caused by students is as a result of bad parenting and not the landlords. There are problems with people using houses as brothels which is not

dealt with by the police. Instead set up a service which charges tenants - not landlords, a fine for their bad behaviour.

- Yet another tax! on landlords - we do not need it - we provide a valuable service to the community

Local business

- This is the wrong approach. It taxes all providers regardless of their willingness to comply. It is clearly intended as a money earning facility for the council which only evokes bad feelings.
- ❖ £100 per year seems a very good deal and gives status to those landlords in the scheme.
- ❖ A good deal
- ❖ A modest amount really.
- ❖ As explained to me, it sounds a good and fair deal for the landlords.
- ❖ Fair x 9
- ❖ Good value
- ❖ If it covers the costs, then all for it.
- ❖ It all has to be paid for, so fair enough.
- ❖ It seems to strike the right balance.
- ❖ Not a big amount for a landlord to pay out.
- ❖ Not a lot of money really for the landlord. Does it cover all of those BHCC costs including this research etc.?
- ❖ Reasonable amount.
- ❖ Reasonable and fair x 5
- ❖ Reasonable.
- ❖ Seems a reasonable amount to pay for the scheme.

Other

- Bad landlords need to be brought up to standard, good ones should be encouraged by proposals,
- Concern that landlords will pass on the fees to their tenants. There needs to be protection to ensure this doesn't happen.
- I would tend to say that the gap between the standard and prompted initial fees should be larger in order to encourage good landlords to opt into the scheme and not simply try to get away with it.
- If you are making money out of other people, the property needs to be in excellent condition and part of that is having an assessment from an outside body, given that many landlords are not totally honest in their dealings
- There should not be any such scheme - the jobsworths inside BHCC need to apply their time and our resources to more urgent issue

Not stated

- The fee should be proportional to the rent charged - it is getting to the point where there is almost no profit for small scale landlords like myself and you will be facing an even greater housing shortage if you drive us out.

5e. Please provide any additional comments to explain your response to the proposed reduction in fee

Home owner

- A nominal fee (£100 or similar) would cover the cost of the scheme and encourage everybody to register. This would give better data and access if the council are really interested in protecting tenants rather than creating a revenue scheme

- Again, I believe a break down of how and why this reduction can take place would encourage good will in the landlord/agency. If people feel this is a 'fine' on top of their usual costs, without a proper breakdown of how the money will be spent there will inevitably be bad feeling.
- Agree - many landlords aim to be professional however it can be complicated at times and regular changes are introduced. Associations also offer legal advice which is useful and keep landlords up to dates with changes.
- All landlords should be accredited and meet national standards of good practice
- As long as this does not penalise smaller landlords.
- Because they can change to party houses
- Because they earn thousands at the expense of local communities that's why!
- It would be a concern if landlords simply pass these fees on to their tenants, which seems a significant risk. This would do nothing to improve conditions or make the landlord more responsible.
- Definitely reward landlords who provide a good service but also, enforce such legislation for landlords that don't meet the minimum requirement. It's these that create a problem.
- Drives up quality of housing to incentivise this
- Every landlord should be registered and pay the same fee
- Fees should be zero in such cases
- Good landlords should not be punished - give them carrot not stick.
- I agree, provided they really do meet National Standards.
- I don't believe in landlords paying fees at all
- I don't feel the money raised through licensing will be used in direct benefit to tenants of HMO or will be used to improve/solve issues caused in areas with high proportion of HMO
- I don't know enough about such schemes to comment.
- I think a discount should only be given to landlords who continue to go above and beyond and therefore take up less of the council's time in investigating, communication and advice.
- I think incentivising landlords to be better by providing a reduced fee structure is a good idea.
- I think landlords who are conscientious and maintain high standards should be acknowledged for that - the work that they produce for the council is somewhat reduced and should be reflected in their licence fee. The council could also issue an awards system for good landlords that they can use when advertising their rentals.
- I think you should also have a Good Landlord Award for examples of best practice. Tenants could nominate, council could verify winner and Mayor could present in Grand Hotel once a year.
- If a landlord has taken the trouble to become accredited it means they are serious landlords and this should be recognised with a reduced fee
- If the other agency is supervising and assessing the house and the council isn't required to do it, then payment should be less on principle
- If this only entails meeting paperwork and paying fees it makes no difference. May ask neighbour's of HMOs to evaluate the quality of management as well as the tenants.
- It is a good idea to reward good practice, provided the accreditation process is applied transparently and consistently.
- It should be the other way around. The expectation should be that landlords and their managing agents behave responsibly - with penalties imposed on those who don't. I.e. Drivers do not pay less road tax for driving within speed limits!
- It's all about improving standards, so if landlords have already received an accreditation, then it makes sense to recognise that. Also, in theory, their properties should already be in good condition and therefore require less time to inspect and report on.
- Landlords who are already meeting good standards should not be penalised by additional costs because of a scheme that is only needed because of bad landlords.
- More likely to rule out bad landlords. But checks would have to be made regularly to make sure standards were maintained.

- No doubt the council will introduce this scheme so yes at least let some be given the opportunity to pay less.
- No fees for responsible homeowners who live in their houses if an inspection identifies that they provide good standards
- No, the fees need to be proportionate to the income the HMOs generate. Landlords choose to chop up houses in this manner in order to maximise income, so appropriate fees should be charged.
- No. Landlords should be able to afford these fees and if they can't then they should not be in business. The fees are there to support inspections, not for profit by the council, so why would landlords get dispensation?
- Nobody would agree on what is good accreditation so who could grant this. It is also administratively burdensome for the Local Authority, the quality of landlord accreditation schemes are poor just because someone goes on a course and gets a certificate does not mean they are good
- None of the accreditation schemes have any teeth.
- Sorry to labour the point, but I still don't understand why you are not proposing a similar scheme for Party Houses.
- The council should promote lets to people other than students. Student accommodation should be on-campus and not in the communities as there is a loss of community facilities etc.
- The landlords are making a lot of money renting their properties out and spoiling areas for people who live in their homes. The landlords buying properties to rent out as HMOs are depriving families of homes and pushing the price of properties up so our young families are unable to buy flats and houses. A property with an HMO is a selling point for another landlord but living next to a HMO forces the value of your home down and makes it less desirable.
- The only way this will be achieved is by unannounced inspections. Once the authority has, say, 3 such inspections which are all highly satisfactory, consideration can be given to reducing annual fee.
- The scheme should be free for landlords who provide excellent standard of accommodation and service to tenants.
- The tendency to take advantage of the council and avoid landlord responsibilities will be strong here and should be resisted.
- They should be exempt from any fee.
- This must depend on whether there is any real saving to the council. I would not support any relaxation in the council's inspection regime.
- To incentivise landlord accreditation
- We want good professional landlords not get rich quick stuff the area ones
- Why should landlord get a reduction for doing what they are supposed to be doing anyway.
- Will a reduction of fees paid mean that less investigations take place, good landlords still have to be monitored to ensure they remain good and not become complacent. They tend to have an 'out of sight, out of mind attitude' to our community
- ❖ A good encouragement to take part.
- ❖ A good incentive
- ❖ A good incentive to join in the scheme.
- ❖ A good incentive to join in.
- ❖ A great incentive to participate.
- ❖ All for using incentives.
- ❖ An encouragement to take part.
- ❖ An excellent aspect to the scheme. Quite sure it will boost participation.
- ❖ Because it will increase participation.
- ❖ Clever x 2
- ❖ Clever idea x 2

- ❖ Clever incentive
- ❖ Clever move x 2
- ❖ Clever suggestion
- ❖ Clever! Quite sure that this will be a good incentive to get more landlords to join the scheme.
- ❖ Encourages more participation.
- ❖ Encourages more to take part and that is a good thing.
- ❖ Encourages participation.
- ❖ Good encouragement to join in.
- ❖ Good enticement.
- ❖ Good idea x 10
- ❖ Good idea that encourages.
- ❖ Good idea that will encourage uptake.
- ❖ Good idea. Will encourage participation and best practice.
- ❖ Good incentive x 6
- ❖ Good incentive to take part.
- ❖ Good move that encourages participation.
- ❖ I would have thought the landlords and their national organisation should benefit in this way. Quite sure most do their job well already and will be equally happy when "bad" landlords are identified.
- ❖ Important to encourage participation. This will.
- ❖ Incentives are a good idea.
- ❖ Incentives are a very good idea.
- ❖ Incentives work
- ❖ It will encourage participation.
- ❖ Smart idea x 2
- ❖ Smart move
- ❖ Smart move. Will encourage participation.
- ❖ Smart plan
- ❖ Very good idea.
- ❖ Will boost participation.
- ❖ Will boost the numbers taking part.
- ❖ Will encourage x 2
- ❖ Will encourage maximum participation.
- ❖ Will encourage more participation x 3
- ❖ Will encourage more participation. Clearly a good idea.
- ❖ Will encourage more to join the scheme x 2
- ❖ Will encourage participation x 3
- ❖ Will work
- ❖ Would encourage participation.
- ❖ Yes, a clever idea that will increase participation in the scheme.
- ❖ Yes, always a good idea to offer inducements like that.
- ❖ Yes, an excellent incentive.

Private rented tenant in Brighton & Hove

- Absolutely, it would be a good incentive and only fair to landlords who already do look after their properties and tenants.
- All landlords should be accredited and should be treated the same.
- Any additional costs will be passed on to the tenants.
- Flat fees for all
- Good landlords should not be punished and forced to increase the tenants rent
- How would the landlord/agent schemes be regulated? Would this allow poorer standards to

- creep in due to lack of accountability - has to be properly thought through to work.
- I believe that the initial fee should be mandatory; however it could be reduced if the landlord/agent is shown to have met the criteria. Maybe the council could publish a list of the best performers to add an incentive for good practise.
 - I don't believe this scheme should go ahead in the first place.
 - I don't think this will make any difference for many private landlords, particularly the nicer, fairer ones who in my experience tend to own 1/2 rental properties. These are not 'career' landlords, simply decent people who are lucky enough to have more than one home!
 - I think incentivising good practice is the best way to improve conditions for tenants.
 - I think that's an excellent incentive. There are some awful landlords in the city, but there are also some very good ones who don't deserve to be penalised.
 - Major letting agents/HMO landlords in Brighton & Hove seem only to carry out basic maintenance after threats; Brighton & Hove council need to establish strongly the principle that minimum conditions must be maintained consistently and not allow agents/HMO landlords to rest/use their national standing to avoid their responsibilities - because that's what they do now and will continue to do so
 - No fee at all
 - No fees should be reduced, as a tenant I don't get reductions in fees for having a good history so I don't see why landlords should get breaks either particularly as they're making a business/profit out of providing homes. More fees, higher fees should reduce the number of greedy landlords who only care about the money in their pocket.
 - Only if those bodies carry out checks themselves, not if it just involved becoming a member of a society, as I think that would just incentive landlords to sign up to get a discount rather than promote improved living standards.
 - They should be treated as fairly as they treat us! No question about it!!
 - This is a business for them, they should be made to pay full rate
 - This would be an incentive to ensure best practice
 - Yes then tenant would have to pay as much
 - ❖ A clever aspect to the proposed scheme as it will encourage more participation.
 - ❖ A clever idea.
 - ❖ All for that.
 - ❖ All in favour of providing incentives and this is a good one that will encourage participation.
 - ❖ Because it will encourage participation and "best practice".
 - ❖ Clever idea that will gain more support for the proposed scheme.
 - ❖ Encourages participation x 3
 - ❖ Excellent incentive to take part.
 - ❖ Good incentive x 4
 - ❖ Good incentive to join the proposed scheme.
 - ❖ Great idea. Will encourage lots of participation and that must be a good thing.
 - ❖ Incentive that will work.
 - ❖ It is an encouragement.
 - ❖ More will take part.
 - ❖ Must help as it will encourage wider participation into the scheme.
 - ❖ The more taking an interest the better.
 - ❖ Will boost the numbers getting involved.
 - ❖ Will encourage more participation
 - ❖ Will encourage more participation and that is a good thing.
 - ❖ Will encourage more participation and that is good.
 - ❖ Will encourage participation x 3
 - ❖ Will increase participation

Social housing tenant in Brighton & Hove

- All landlords should meet these standards anyway
- As long as that is regulated by a non associated body.
- If not industry self-regulation. Tenants and tenant bodies must be included in the awarding of accreditation.
- It depends on how rigorous the accreditation scheme is
- My landlord has allegedly received awards for good practice; I am appalled and surprised by this considering the abuse and the conditions and the continued missing of deadlines for repairs and the shoddy state of repairs. I think when landlords have multiple properties all their tenants should have a say in whether the landlord gets or deserves such accreditation. Landlords should also be made to play significant compensation to tenants when health suffered due to their failures, or housing conditions.
- ❖ A clear "sweetener"
- ❖ A good idea
- ❖ All for incentives because they work.
- ❖ An encouragement to join in.
- ❖ An excellent encouragement to take part.
- ❖ Clever idea will encourage more participation.
- ❖ Encourage participation.
- ❖ Encourages landlords to join scheme.
- ❖ Encourages participation x 2
- ❖ Good idea x 4
- ❖ Good idea that will encourage more to take part.
- ❖ Good idea. Good incentive.
- ❖ Good incentive x 3
- ❖ Good incentive to join up.
- ❖ Good incentive to participate.
- ❖ Good incentive to take part x 2
- ❖ More landlords will take part.
- ❖ Will boost the numbers taking part.
- ❖ Will encourage more participation
- ❖ Will encourage more participation and that is a good thing.
- ❖ Will encourage more to participate in the scheme.
- ❖ Will encourage participation x 2
- ❖ Yes because it is an encouragement to join in and do their very best.
- ❖ Yes, a good idea to do that.
- ❖ Yes, by all means use a reduction to encourage participation.
- ❖ Yes, will encourage joining in.
- ❖ Yes, will encourage participation.

Live in a shared home or HMO

- Good landlords should be rewarded and encouraged to do well. Additional fees for those who fulfil their role well will not encourage good behaviour in all.
- My landlord is on landlord scheme and still not that great
- Ownership and responsibility for maintaining rented accommodation can be easily obscured, outsourced, loaned etc.
- ❖ A good incentive x 4
- ❖ A good incentive to participate.
- ❖ Because it will encourage more to take part.
- ❖ Clever idea
- ❖ Encourage participation x 2

- ❖ Encourages more participation.
- ❖ Encourages more to sign up.
- ❖ Good idea x 5
- ❖ Good incentive x 7
- ❖ Good incentive to join in.
- ❖ Good incentive to join the scheme
- ❖ Good incentive to sign up.
- ❖ If it encourages more participation, then go for it.
- ❖ Means more taking part, so that is a good thing.
- ❖ More will take part x 4
- ❖ Smart idea
- ❖ That is a good idea because it will encourage more participation.
- ❖ Will encourage involvement.
- ❖ Will encourage more participation.
- ❖ Will encourage participation x 5
- ❖ Will mean that more will take part.
- ❖ Worthwhile incentive x 2
- ❖ Yes, will encourage

Letting/ managing agent

- The world works on incentives. After all, what behaviours are you hoping to encourage and compliant landlords require less/no oversight

Landlord of property in Brighton & Hove

- A lot of money at present for just a do list of petty nonsense
- Accreditation will ensure HMOs are always in good condition, saving the council money on inspection and enforcement
- Renewal fees should be lower if there has been no serious issues in previous period. A discount should be applied for members of Landlord associations. Renewing licenses should also have the option for paying by instalments, if the system has to continue!
- As an accredited landlord I strongly agree. There should also be a reduction for NLA members. Also there should be a reduction for landlords that keep their properties in good order. The scheme does not take into account joint ownership, which is not very fair.
- You are assuming all landlords act unprofessionally which is insulting.
- Because this prioritises lots of tick boxing, not actual better quality of housing or a better neighbourhood. It pushes rentals into a more bureaucratic managed system where profits are of more importance than people and local landlords succumb to national rental companies.
- Depends on what obtaining an additional accreditation would involve. Landlords will not wish to incur greater costs or have more administration than necessary.
- Encourages better education and good practice.
- Good landlords should be encouraged and this encourages them in their wallets!
- Holders of the existing schemes should be charged the renewal fee even if their scheme has ended. E.g. Lewes Rd scheme.
- I am writing a long separate letter concerning discretionary licensing much applies also to extra tiers of inspectorates but 1) Inspectorates do not provide the needed extra housing units! 2) Red tape and licensing and fees will only decrease provision 3) Where are the council's own schemes for the homeless? 4) Where are the new council flats or council houses?
- I don't agree with the scheme of licensing. As a landlord when tenants say jump I say how high. I and many like me try to be as good as possible. Common sense, better property, better tenants better rent.
- I don't need to a scheme to know what is the right thing to do.

- I take great pride in my properties and would happily live in them myself. Indeed the HMO officer who came to inspect them said as much and that the scheme wasn't really directed at landlords like me. I would welcome an initial visit to ensure that the fire regulations are good and to check the overall property. Then I feel a lesser category would be appropriate, at the moment I am lumped together with "career landlords" who cram as many tenants in as possible and do no repairs. It's a very broad sweep.
- If a scheme is passed (which it should not be) then substantial discounts for good (not necessarily accredited) landlords should be applied.
- It is important not to penalize professional landlords
- License fees are too high and do not encourage good practice
- No fee for good landlords
- Not sure whether my own agent is accredited or not - I will now check!
- Of the licensing in place, certainly there should be a reduction for landlords that consistently achieve standards above the bar.
- People such as the NLA are making a business out of landlord accreditation when it is not justified. You can be a good landlord without being accredited. Registration/accreditation = more necessary cost to landlords and more money for NLA.
- All fees will be passed on to the tenant or will encourage illegal landlords. As long as everyone understands this I have no problem with the scheme. If is essential sufficient, sensible resources are put into policing the system i.e. not a bureaucratic process-driven nonsense.
- Should be a discount for landlords that belong to a landlord organisation for example the Southern Landlords Association.
- Some landlords, like myself do not use letting agents but manage the let house personally to keep down costs thereby keeping the rent fair. I'm not accredited by any 'body'. Not sure accreditation would help in any way.
- The better landlords re-invest a chunk of their profits in order to maintain good standards and tend to be long-term 'stayers' rather than rogue operators who max up profit to the detriment of tenants and landlords and as such the better ones would pay less
- The justification for this is only 2 grounds: Improve the quality of properties; avoid ASB. The council already has powers to counter both these problems. However, it is a good idea to register all landlords and properties provided you also licence the other problem areas (short term holiday lets and Airbnb's) so that you can address problem properties
- The national scheme is easily manipulated
- The scheme's aim is to improve safety and other conditions for tenants, when landlords do not set up properties according to good practice. But at present it heavy handedly penalises good landlords, and costs them unreasonable amounts of money, for no good reason. I don't know what effect it has on bad landlords; I only hope the council does the required checks.
- The standards of your scheme should meet these standards.
- There is currently no incentive from the council to be a proactively good landlord rather than one who needs to be prompted and managed every step of the way to provide the bare minimum.
- There is enough bureaucracy already with out adding any more and as an ex Letting Agent I would not trust any organisation to run such a scheme. In fact my properties are managed far better than any by the council!
- There should be a visit at a £100 cost maximum. If a landlord can prove on the day of the visit that they meet various standards (Gas cert, electrical safety, including PAT tests, ample bins provided etc.) then that fee should be waived. Every landlord can and should ensure that they have time to make sure that these basic requirements are up to date.
- There should be no fee - It is another tax
- There should not be any fee for good landlords. The proposals affect all landlords and tenants good and bad. The minority are penalising the majority under these proposals.

- There should not be any fee that can't be demonstrated has been used to improve HMO stock
- These landlords should not have to pay anything
- This would favour large landlords over smaller landlords
- Why should there be a fee at all for good Landlords? I don't see why a good landlord has to fund inspections for bad ones!
- Yes of course good landlords with a good track record should pay less, these properties require less admin and work by the council
- Yes, if you are looking to drive anything positive from this and not just a money making scheme for the council then put some consideration into encouraging people to be more professional in their approach. The problem in the city though is from tenants not landlords! Fine the people who behave badly don't put an overhead onto everyone, it's a very dictatorial approach and is not solving the underlying problem.
- You are penalising good landlords and their tenants. The cost of your proposed scheme will be passed directly on to tenants. You are ensuring that landlords do not spend money signing up to any other scheme
- You have to pay to be accredited which can be quite expensive so perhaps this should be offset against the cost of the licence to some degree.

Local business

- The national guidelines don't go far enough in terms of providing affordable and decent housing.
- ❖ A very good idea as it will boost participation and potentially encourage more landlords to come forwards.
- ❖ All for incentives and encouragements like this one.
- ❖ All for offering incentives.
- ❖ An encouragement x 2
- ❖ An incentive.
- ❖ Anything that encourages more participation in the scheme is to be welcomed.
- ❖ Boosts participation.
- ❖ Clever idea x 2
- ❖ Clever move.
- ❖ Clever. Yes will boost the numbers joining the scheme.
- ❖ Encourages uptake.
- ❖ Good idea x 2
- ❖ Good incentive x 5
- ❖ More will join the scheme.
- ❖ Nice one, good idea.
- ❖ Will encourage involvement by more landlords.
- ❖ Will encourage more to take part in the scheme and hence adopt a modern and sensible approach to an age old problem.
- ❖ Will encourage participation, a good thing.
- ❖ Will encourage participation x 2
- ❖ Will get more to "sign up".

Other

- I am not convinced landlords have sufficient integrity to regulate themselves
- Provided that these standards of good practice were similar to those of the new regulations, sure.
- The whole proposal seems to be superfluous to existing legislation requiring standards of habitation, and does nothing to protect tenants' rights. It just seems to completely miss the point. Were any tenants or tenants' groups consulted prior to this online questionnaire?
- There should be no fees (which the tenant ends up paying!) because there should be no

scheme!)

- Yes, reward honesty and good standards

Not stated

- Registering under an accredited landlord / agent scheme costs more money - there is very little money in renting properties for people with one or two houses - they also tend to take care of their properties because they are their pension fund or a previous home. I think there should be an exemption for small scale landlords or you will drive them away.

7b. Please provide additional comments to explain your response regarding online applications and payments

Additional comments from Landlords

- As long as instructions are clear and easy to understand. Would be helpful to landlords if agents are knowledgeable too and able to support the application process.
- By making it online this appears somewhat automatic making it look like another tax for landlords.
- Communicate through email not letter, a lot of landlords are not in the UK
- Computers do not build houses or provide new homes to rent (people do with their savings). As I am partially sighted don't have a computer however, I would appreciate help if this ill-advised scheme does get a go ahead (council officer are usually very good especially the staff on duty at Norton Road).
- Depends how good your website application process is.....
- For people new to the scheme the information is very confusing. It does not make clear that if you apply for an HMO halfway through the 5 years you still have to pay full price. Also with my three bedroom properties I can choose to rent them to families and not apply for an HMO. Your website makes me pay up front for an HMO before anyone visits the property to tell me how much work is needed to bring it up to standard for fire regulations (this is higher than most people have in their own homes). I have a three storey 1970s townhouse with open living room /staircase. There was some debate about having to build a large internal wall to adhere to regulations. I would need to know this before I went ahead and applied for the licence.
- Get a new website or better system of payment or even use PayPal.
- I am in tears over this
- If it is online, this would be very cost-effective, so again, it shouldn't be such a high licence cost. Why do you need to make money out of it, just let landlord's register if H&S is all you are really concerned about? Extra taxation by the back door!
- It needs to be face to face. No scheme is 'fool proof'
- I've paid before using the Council's website...it works but it's a bit clunky.
- Lower fee on application balance once an inspection date is set.
- Maintain good communications should there be any queries or anomalies
- Make application self-certifying with check lists on standards required so council know who needs early visits.
- Make your website work better if this is your main platform! There must be a phone line to deal with queries for landlords as well as tenants
- My husband can't use a computer. If I'm not around he needs to use the phone. I think many landlords are elderly and not modern technology savvy. We were encouraged to use property to finance our old age. Have you stats on the age of landlords and number of properties each owns.
- Need access to help on phone and a better website
- Not every house owner will have internet capability. Also, how are you going to contact such people in the first instance?
- Not every landlord is on the internet!!!!
- Obligatory online activity is against the individual's freedom of movement

- Obviously anybody that would have a problem paying this way couldn't answer this question! Think that through - a bit like asking - are you illiterate? If you are you can't read the question! If you are IT disadvantaged tagged you're not reading this!
- Online application - capacity to save and print as you go.
- Other forms of application and payment should be made available to me. They would be much preferred.
- Please don't require some really difficult to provide piece of information or overly onerous identity checks.
- Previous attempts for such things have always been extremely difficult to use especially when drawings have been required!
- Scrap the whole thing - it is just jobs for the boys
- The current website is not fit for purpose. The need to charge landlords needs to be demonstrated as per previous comments
- The landlords who work abroad how can they access the website?
- The online systems aren't great. Make sure you understand everything that people will need to do online e.g., increase the size of their license from 5 to 6 and how they go about paying any increases due. The current process is shockingly bad for this, even people in the PSH team haven't always known. So, make sure you understand all of your 'customer journeys' and ensure that there are clear and workable processes in place for them to meet their needs.
- There must be elderly landlords who don't have access to a PC, or even know how to use one. You must make an allowance for those people, whatever you do - make it simple. Look for example at the government website to re-tax a car. It is a delight to use!!
- Why is online important? It costs less for the council to administer but the costs are rising. Surely there should be a lower fee for using my time on line than a fee for the council to issue paperwork?
- You should certainly make it possible to do it online but what about people who can't use computers? (E.g. if blind, severely dyslexic or whatever). You need to have an alternative method available, as with everything. It is simply unfair to make people do things online when they can't.
- Your online application is unfathomable I wish to continue to come in and or post paper forms

8b. If you answered that the scheme should be introduced in 'fewer areas' please let us know which areas you feel should be covered and why

Just 2 of the 5 respondents who answered 'fewer areas' provided additional comments as follows:

- **Home owner:** Areas of intense HMO / student accommodation
- **Landlord:** High density student housing areas and central Brighton/Hove

8c. Is there anything we have not considered or, do you have any comments about the proposals to introduce additional licencing across the whole city?

Home owner

- As stated previously I am worried about single people living together being classed as HMOs and therefore the availability of housing for young people not in a family or relationship will be even further diminished
- As the fee structure stands I disagree with implementation; it will not at any benefit. Most of the terrible landlords are already known about, and they are still allowed to continue despite existing powers to stop them, and existing obligations of the council to look after its residents
- Assume this won't deter landlords operating in Brighton as we need to provide homes for those who rely on PRS. I think it is essential this scheme goes ahead to raise safety and decency for those who rely on this sector.
- Badly managed HMO's are having a detrimental impact on our city, it is the local people who are

coping with the consequences while the landlords make huge profits and pay no heed to complaints.

- But you need to go further and include party houses. I can't understand why these have not been included. When you look at the number of these growing across the city, and there does not seem to be any regulation.
- Enforcement
- Have a much bigger and quicker investigation and enforcement team. The current rules are already being flouted
- HMO rate should be raised from 10% density to 25% density in recognition of overpopulation issues in city/lack of affordable housing as per some other councils such as Bath and London Haverling, particularly if government can be persuaded to count this as extra accommodation provision in line with local housing target. In addition we have 19,000 temporary workers in the city each summer season who do not require long-term accommodation. Both universities have committed to capping their own numbers (and University of Brighton numbers set to fall anyway) so there will shortly be no further demand for student housing. Re the family housing argument, even if both universities closed down next week, few families would be able to afford to live in Coombe Road. Planning refusals should be based on number of legitimate formal objections/complaints about a property/landlord/tenants and not influenced by rumour or anti-student/anti-HMO sentiment. It is worth remembering that 70% of HMO's nationwide are professionals sharing who cannot afford to get on the housing ladder and NOT students, much as there are pockets of students in certain university towns/areas.
- I am a solicitor, admitted in 1986. I used to practice as a specialist legal aid housing solicitor in the London Borough of Southwark until October 2013. Currently, among other things, I provide training on housing issues with groups of community workers in London. I am not myself a private renter or landlord but I have extensive experience of the problems associated with private renting through my clients and currently through the community workers present at the training. I also have current and past friends who have rented in Brighton and Hove. I note that the highest proportion of non-Decent homes is in the private rented sector (28%, English Homes Survey 2015-16), and that tenants rarely complain principally because of the high demand for properties and fear of eviction (Shelter report 2014). The poor quality housing is concentrated at the cheaper end of the market where the level of housing need is highest, which also militates against tenants complaining (this is evidenced in the same report). As a result we cannot rely on the occupiers to enforce their rights to have their homes repaired; the only means for improving poor housing conditions is through local authority enforcement. Under the present regime of austerity and cuts to council services, it is hard for the environmental health departments to have any impact. A licensing scheme, the revenue from which is ring-fenced for enforcement and regulation of the scheme, will help a great deal; I am very encouraged by the evidence supplied that existing licensing of smaller HMOs has had a good effect. I therefore heartily support both the proposed schemes; that is the citywide Additional Licensing scheme and the Selective Licensing Scheme. I would also support any attempt to extend the second. The burden on a good landlord, amounting to only a hundred or so pounds a year, will be minimal.
- I cannot emphasise strongly enough the importance of including Party Houses, Airbnb and uber in the Licensing Scheme and making landlords responsible for the anti-social behaviour caused by their tenants. If such places are not included the Council have shown themselves again unwilling to put the interests of local residents before the interests of money.
- I do not trust landlords, who do not live in the same community as their HMOs, not to be complacent and will not do anything extra if someone is 'not on their case'. Their tenants, especially students, can change every year, and the whole thing starts again, trying to get them to deal with their rubbish properly and on time etc., learning to live in a very tight, close knit community, in very close proximity to their neighbours. I end up having to 'train' each new household, in our next door neighbours, every September to try and get them to accept/

understand their responsibilities re living within the community. I don't mind as I think it is worth trying to encourage community spirit but it is not my job!! I dread getting new tenant next door, my stomach churns every September, and it can really impact on the quality of my life and feel that it is completely out of my control what my life is going to be like for the next year. It's awful.

- I have been unable to find any information relating to the proposed density of HMO's in any of the documents linked to on your Private Rented Sector consultation 2017 pages. As a private owner I do not want rented accommodation next to me at all as most in my area tend to be occupied by noisy students who leave rubbish all over the pavement with impunity. Licensing rented houses is a good thing because it will limit the amount of sharers in a non licensed house, however I do not want someone to be able to buy the houses both sides of me and turn them into HMOs so what is the proposed packing density in any given area? This is a very important question yet you are not being clear about it. Why is that? I have ticked to say I strongly agree with the proposal to introduce additional licensing across the whole city - but if there are to be no limits on the packing density then I strongly disagree - so as you have not given me the information I need, I am having to change my response to don't know. I also want to be informed of an application for an HMO license (and renewals) within four houses on either side of me, and be given the opportunity to contest it. I want the property owner to pay the cost of that.
- I have concerns that landlords will pass on the cost of the licencing to tenants - either directly or via some 'admin fee' route. I would like to see mention of this in the documentation including proposals for ways to support tenants who encounter this issue. The rents charged in the city are already very high, with landlords making huge profits - this shouldn't be an excuse for them to make more money or for tenants to have to pay more to live in decent conditions.
- I should not have HMO both sides of my house
- I support the principle of additional licensing. However, an appropriate balance needs to be struck to ensure new requirements are fair to both tenants and landlords to ensure the availability of an adequate supply of decent housing in the private sector.
- I think that you should consider exemption for co-operatives where the tenants have sole responsibility for the maintenance of their property. These residents might be supported with helpful quality assurance information but ideally their costs would be kept down in order to promote cooperatives/social/low-cost housing for the city.
- I think the council should also be campaigning to get national government to reintroduce rent tribunals.
- I think the whole concept of planning permission for an HMO smacks of nanny state. Councils should be able to keep an area as a community. But 10% is too low. Other councils do 25%. I think that a home owner has the right to rent out property to whomsoever they wish. However.... landlords should be accountable to the council for the health and safety of their property
- I welcome the licensing of private rented housing in the City centre, to improve standards for the benefit of tenants and local residents. But in the last few years there has been a big increase in unregulated holiday lettings through web sites like Airbnb. The Environmental Health Department say HMO licensing legislation does not cover holiday properties as the length of stay of the occupiers is not long enough to qualify as a primary residence. But some landlords now let for long periods through holiday websites to avoid private sector regulation. For example, in my street there are four terraced houses let through holiday websites. The house next door is let through Airbnb.com by the owner who lives in South Africa with only a cleaner supervising the property; these houses have been let to students for periods of three months. In London, holiday lets over 90 days a year require planning permission. I suggest Brighton & Hove City Council ask Government for this 90 day planning limit so that longer periods are covered by the proposed new licences.

- I wish there was less interference in our lives by people who couldn't get a proper job in the commercial sector and instead want to regulate life out of existence. Another sad and pathetic attempt to regulate people's choices.
- I would like to see all rented properties inspected, but appreciate there is a limited budget, and think this is a good compromise
- I would strongly urge the Council to look again at the menace of Party Houses within the city. The current measures have been an abject failure for the last 5 years and have only seen a massive increase in party houses. Causing misery to the woefully underrepresented residents. It is time for the Council to stand with the local residents and remove them. They are destroying neighbourhoods in Kemptown, North Laines, and Hove.
- If you were serious about improving conditions you would have gone after rogue landlords, this will only increase rents and have little impact in improving housing standards
- It could be licensing can help to improve certain areas that do suffer from anti social behaviour/noise issues etc.
- It should be made transparent what standards "good landlords" have achieved and they should be reassured that meeting these criteria leads to cheaper licence fees.
- It won't surprise you to learn that I believe there also needs to be a similar licensing scheme for Party Houses.
- It's not enough to start from a position of not more than x% of HMOs in a certain radius. You need to consider the concentration in particular streets - e.g. in my street there are two next door to each other, each containing 7 tenants, and another directly opposite them (unlicensed).
- Landlords will have to raise the rent greatly to cover the massive costs proposed by this scheme. Most landlords look after their tenants very well. Unfortunately, not all tenants look after the property very well and licensing will not make any difference. A licence will not stop noise pollution or anything else. This is a very badly thought-out scheme.
- Landlords/owners of holiday flats and party houses should also pay a fee. Unfortunately there is no class use for privately rented holiday accommodation, much of which is used as hen/stag weekends, causing grief to neighbours. This should be looked into by the Council. There is legislation that can be used as other authorities use it.
- Licence letting agents and cap the rip off charges they force on tenants. Make HMO student landlords contribute towards the council tax.
- Licence whole city or problems move on to other areas
- Licencing should take into account where the HMOs are or are being proposed.
- Limiting the scheme to "properties of two or more storeys" might be inadequate. We have a house next door to us that has been divided into three flats - two downstairs with one occupant each, and one student flat upstairs with six occupants. It is the upstairs flat which causes problems but it is unclear if it is covered by this scheme.
- Maintenance of landlord standards within the licencing period and on renewal; when, who and how will checks upon standards be considered, e.g. standards stated, but how will these be regularly monitored to ensure long term licencing standards feel landlord will continue to get away with leaving things which effect neighbourhood.
- My only concern is the affect it could have on affordability, rents already far outstrip local housing allowance levels and I worry that increased landlord costs will be passed onto tenants.
- No license to be issued until planning permission obtained and safety work finish. No conservatories to be used as main shared living room.
- Not licensing - but why are HMOs allowed to pay very small amounts of Council Tax. Band C for a 6/7 bedroom property?
- Not much point spreading resources out to Patcham / Hangleton and other outlying areas - concentrate on known inner city and university areas
- Not sure why a licence has to be given just because a property has a planning application in!?
- Nothing in the license encourages an increase in the supply of disabled accessible rented

accommodation

- Only where the landlord doesn't live at the property; live-in landlords
- Please consider these issues for so called 'party houses'. When a property is in a residential area and not inhabited apart from large groups of revellers then these should need licensing and planning permission and be subject to fees and additional costs relevant to running a business.
- Private rented property is needed but the licence scheme does not involve neighbours and it is neighbours who suffer from a continuous turn around of multiple households in small terraced tenanted houses. Neighbours have no right to complain as any complaint must be declared when they sell their house. One partial solution would be for neighbours, as part of the licence agreement, to be given the opportunity to be involved with the selection of tenants. After all it is the neighbours and the new tenants that will be living next door to each other - not the managing agent and landlord.
- Scrap the whole additional licensing scheme; it's been a disaster for the supply of rooms and the cost of renting those rooms. The council should concentrate its efforts on the small number of rogue landlords and letting agents and allow the majority who provide good or excellent accommodation to get on with providing an essential public service that the council does not.
- If rigorously enforced and with severe penalties for breaking conditions. Would be useful to apply to other smaller rental properties, large flats (e.g. not over 2 storeys) and those occupied by families (so landlords could not avoid meeting licencing conditions by renting to families rather than friends).
- The effectiveness of this is down to enforcement. Good landlords, of whom there are many, will comply with the scheme. Unless there is efficient enforcement the rogue landlords will just ignore it.
- The licencing should be for all let properties regardless of the situation
- The ratio to home owners and HMO should be made tighter so there are fewer HMO's in areas.
- Tighter restrictions and more policing of property standards.
- We need to have clear guidance for those that were licenced under previous additional licensing schemes what happens to their applications and how much they are charged
- Where there is a problem, tackle it. Otherwise more legislation does little to address any real problems. Hold landlords that don't meet minimum standards to account, hold landlords partially accountable for the actions of their tenants perhaps? Where there are problems then the landlord becomes invested in ensuring that they are dealt with?
- Why are Party Houses not included? Why doesn't the Council investigate the landlords/owners of the thousands of privately rented flats and houses that are used for party houses, but are not classed as HMOs, and charge them too?
- Worried that the cost will, one way or another, be passed on to the tenant. The irresponsible landlords this scheme is targeting are the ones who aren't going to let their profit slip.
- Yes, no matter the fee or the policy unless you have enforcement you will not achieve the objective of making HMOs safe, healthy and suitable for habitation. I visit properties and when I say the conditions are unsatisfactory I am told by the owner this is not the norm, I have attended on a poor day, this is only a snapshot when the tenants have wedged doors open or stored items on the means of escape. With 50 years service in fire protection I know this is not the case and any time you visit that property unannounced the norm will be unsafe! There must be a timetable of inspections unannounced.
- You need to be able to enforce the ASB of tenants and draw up a tenant charter. I can't believe that a property, for instance, is a 'wet hostel' where residents are allowed to take drugs and drink alcohol, all of which lead to ASB. It's a callous thing to do on your behalf and creates problems for neighbours as well as the poor residents themselves who are clearly often suffering from emotional disturbances. It cannot have escaped your notice that every single day there are ambulances and police cars stationed outside the place, dealing with the problems inside. You might as well have a subsidiary of John Street police station there.

- You need to charge more so you can make sure you have the money to be able to enforce it! You should also be introducing fines for landlords not adhering to the conditions imposed.
- ❖ A no brainer. Needed and will help sort the rented sector.
- ❖ Best if BHCC kept out of this.
- ❖ Enforcement of the scheme is critical to its success.
- ❖ Excellent scheme that will boost the City.
- ❖ Glad to be able to have my say.
- ❖ Good luck.
- ❖ Good work by BHCC. Support. Thanks for taking my views.
- ❖ I particularly like aspects of the scheme to tackle anti-social behaviour such as littering and noise. Certain areas in the City are plagued by that.
- ❖ Important also that similar schemes in other parts of the City are up and running too.
- ❖ It is very comprehensive and detailed.
- ❖ Looking forward to the adoption of the scheme.
- ❖ Lots of info patiently explained by my interviewer.
- ❖ Needed across the whole City x 2
- ❖ Please introduce as soon as possible.
- ❖ Pleased to be consulted/interviewed.
- ❖ Pleased to be invited to participate.
- ❖ Pleased to be involved/interviewed. Very comprehensive proposals, well explained to me.
- ❖ Pleased to share my views.
- ❖ Proposals well explained to me.
- ❖ Schemes elsewhere have brought success. Thanks for the interview.
- ❖ Similar scheme doing well elsewhere. Really good if it is adopted across the whole City.
- ❖ Thank you for taking my views into account.
- ❖ Thank you for the interview and good luck with the proposed scheme.
- ❖ Too much red tape will result in fewer rental opportunities in the City.
- ❖ Very detailed proposals well explained to me.
- ❖ Well done BHCC. Very good scheme that will boost the City.
- ❖ Would like to see it adopted as soon as possible. Thanks for taking my views into account.

Private rented tenant in Brighton & Hove

- "These would be properties of two or more storeys occupied by three or more people who are not from the same family and who share a kitchen, bathroom or toilet" - the same standards should apply to everyone - all houses, all parts of the city, all tenants. It is ridiculous to have different, inferior standards for families. Safety is Safety
- After 10 yrs. renting in Brighton as a family, the number of available houses with 4 bedrooms has never been so low. We were nearly homeless with 3 weeks left on our current tenancy. Landlords can earn £2,500+ a month letting a low quality house to students. To let to a family, they earn less and need to keep the house in better condition. No surprise they elect to offer low quality student housing.
- Again, I reiterate the point about people working and currently living in Brighton who are self-employed, working on a minimal or minimum wage and wish to continue to live in Brighton. Studio and 1/2 bed properties are expensive, really hugely expensive and in high demand. Where can we afford to live when house-shares are the most affordable option possible, suit certain lifestyles and personality types and actually reduced waste/rubbish/fuel when small groups of people share and live communally in a family environment?
- As per the parking schemes being put in place across the city the raw data collected during the preparatory survey will not be made publically available. Only the results that the council want will be made available to the public to justify their decision. The outcome has already been chosen and these surveys are purely in place to make people feel that the final decisions are

made democratically. It is a case of casting the verdict before trying the accused which is not democratic.

- Fully support the council in this scheme
- HMOs discriminate against those who do not live in nuclear family units. Although this legislation is presented as protecting those in rented accommodation, because of the cost to landlords of the licensing scheme and the reduction in the supply of rented houses, it is experienced primarily by tenants as a rent rise. It seems ridiculous that a group of unrelated adults living together needs more state protection than a family with several children. The constant publicity around reporting HMOs has made those who have formed households with friends feel that they are not wanted in their neighbourhoods and are under surveillance. Renters in the city face very real problems such as high rents, insecurity and abysmal housing conditions, however, HMO legislation will not tackle these. Rather than focusing on properties according to the household makeup, the council should think more imaginatively about the criteria they use to regulate problematic parts of the rental market. For instance, short term tenancies are harmful to everyone - for tenants they mean regular evictions and rent rises, whilst proliferation of such tenancies disrupts and destroys communities. If the council was to focus its regulation on short term lets, it would encourage landlords to offer longer tenancies which would be beneficial to all.
- I strongly disagree with this scheme for reasons in my survey. This can be tackled in and under current regulations directly without affecting residents and the council's pocket themselves. Think about it!! It makes no sense whatsoever.
- I think it's a good plan. I know of someone who lives in a HMO and it's disgusting. They have to put extra money in a meter to get hot water. The flat is so damp their clothes have gone mouldy and repairs go for weeks without being addressed. They have to turn on their excuse for an oven for heating. It's poor show people are forced to live like this anywhere, but in Brighton we're affected by the sky-high house prices and rents that go up and up every 6 months in some cases. No wonder more and more people have to privately rent (the council obviously has so little capacity; I know families are placed in emergency accommodation in Eastbourne), and when a studio flat is 600£+ before bills more people will be forced in to bedsits and HMOs.
- I think you should be looking at rent caps as well....the rent in this area is extortionate for the properties available. Working people and families really struggle to make ends meet and if a rent cap was introduced it would help thousands of families.
- It is completely essential in my view that there is better regulation of the private rented sector, despite having no problems in my current tenancy. We declined to live in about 90% of the properties we viewed due to the level of damp/mould/otherwise unfit living conditions. We were lucky to be able to afford a slightly higher rent, but many people are not and end up with substandard accommodation as a result, whilst landlords cash in on the property boom.
- It will mean increased rents
- Licensing needs to be seen in context with social housing and opportunities for young families to rent.
- One of the roles in my job is to help vulnerable clients (homeless and usually with significant MH needs) find private rentals. What I have seen especially in the last year and what I am hearing from landlords is studios/HMO type properties are now being let as short term holiday lets. It seems as though landlords are switching to letting properties via Airbnb and similar sites where they get more money and don't have to be so concerned about their tenants needs, and possibly not even needing to let the property out over the winter. I'm not sure if HMO licencing would cover holiday lets? I suspect not and therefore probably wouldn't solve the issues of poor maintenance or ASB which could still continue with holiday letters. I feel the Additional Licencing Scheme to extend HMO licences to smaller properties would discourage landlords from private letting altogether. I think landlords with smaller portfolios of properties would be more disproportionately affected by the extra costs rather than larger landlords, and I feel it's usually

larger landlords that tend not to be so available or manage maintenance for their tenants. Also what I find is that some landlords are letting properties within a building where they are leasing from an overall freeholder so I feel that in communal areas the landlord may not have much power to improve overall building conditions.

- Still too many landlords are going to slip under the wire.
- Tend to agree, however smaller properties 3 occupants or less should be exempt. Must be ensured that these proposals do not force an increase of already unaffordable rents across the city.
- The only slight reservation I have is that it may translate in some landlords increasing rents to cover the licensing fee...
- The sooner this is introduced the better. Make Brighton & Hove a standard bearer for national good practice.
- These proposed extra charges are totally unfounded! Not wanted, not needed! As I have said before, we struggle financially as it is to keep a roof over our heads, and feed ourselves as it is. I am struggling with depression and anxiety as it is, this added pressure will only make my situation worse!!
- This proposed scheme will increase rents in the city which is already on the highest places of rent in the country.
- Yes you have not considered the mental health of some tenants.....I am an army veteran under Combat Stress, a veterans military charity. I have been diagnosed with PTSD x2 and this is never considered when prices anywhere are increased...it is all about money
- You are there to represent the residents and you propose to increase our rents by your greedy actions, this is not agreeable to the majority of the populace
- ❖ Bring in as soon as possible please.
- ❖ Bring it on as soon as possible.
- ❖ Delighted to learn more about and giving my views on this excellent proposal. Re Q10 Social media/press better.
- ❖ Excellent proposals from BHCC. Pleased to have contributed. Re Q10 Much better via social media.
- ❖ Fully support the excellent scheme. Thanks for letting me have my say.
- ❖ Fully support these excellent proposals and look forward to them being in place as soon as possible.
- ❖ Great scheme. Looking forward to its adoption soon.
- ❖ It is needed!
- ❖ Needs to be adopted as soon as possible.
- ❖ Support the scheme. Thanks for seeking my views. Thanks to very patient interviewer. Re Q10 Social media
- ❖ Thanks for asking for my views.
- ❖ Thanks for letting me have a say. Re Q10 Social media better.
- ❖ Thanks for obtaining my thoughts.
- ❖ Thanks for the interview x 2
- ❖ Thanks to my interviewer and BHCC for asking what I think.
- ❖ Very comprehensive and well outlined by my interviewer. Similar schemes seem to be doing well in other area of the City. Let's make it Citywide.

Social housing tenant in Brighton & Hove

- I agree with the scheme as long as the resources raised are used to regulate HMOs and in some way get discounts on some material, e.g. fire doors, smoke alarms, etc.
- I think that licensing should be applied across the city
- There should be greater scrutiny of social landlords. There should be prosecutions for landlords of some of the properties in the city specifically those which are short term use for people who

have been homeless, young people, vulnerable people. And example of this is a property which was allowed for many years to collect the housing benefit for property which was unfit for human habitation, poorly managed and where tenants were threatened with being made homeless or thrown out on the street if they made complaints. Landlord who coerce tenants, are responsible for damaging their physical and mental well-being through poor management, or failures in service should be prosecuted and forced to pay compensation to those who have suffered.

- ❖ Agree with the plans.
- ❖ Bring in as soon as possible x 2
- ❖ Good scheme. Support
- ❖ Looking forward to seeing this being adopted. Thanks for the interview.
- ❖ Please bring in as soon as possible.
- ❖ Thank you to the interviewer and asking for my views on the proposal.
- ❖ Thanks for the interview x 3
- ❖ Thanks for the interview. Good luck with the scheme.
- ❖ Thanks for the interview. Re Q10 Social media better.
- ❖ Thanks for the interview. Re Q10 Social media/press/radio.
- ❖ Think this will be a big success. Thanks for letting me have my say. Excellent interviewer was with me for over 25 minutes
- ❖ Very, very detailed. Well done to my interviewer.

Live in a shared home or HMO

- I agree this should take place if it improves conditions. If it doesn't then its just another way for the council to get money and some of the poorest to suffer with rent increase and not a better home
- Noise and adequate soundproofing from general living noises should have additional stipulations for HMOs. Doors and fixtures/fittings should not have an impact on those living adjacent. Property maintenance needs a lot more stipulations. For example plumbing including noise emanating from systems. Damp is a massive issue in rental properties across the city. Tenants are often blamed for misuse of rooms, not adequately venting the rooms etc. However landlords do not address any structural or physical requirements adequately enough to permanently rectify the issues. Supply of dehumidifiers as a long term solution is not adequate especially if the issue is in a bedroom.
- The scheme should for properties so 1 and 2 occupants as well as specially those are the bad ones in the city
- There should be close attention paid to ensuring that all elements of the housing is secure and does not present easy pickings for burglars and opportunist thieves. Pre-paid gas and electric top-up meters that are operated by many letting agents are grossly over-priced and are effectively an additional fuel tax on the poorest. These need to be curtailed, better regulated or ideally done away with entirely. I would like to see the onus of financial responsibility shared with landlords and for them to prove to authorities/renters that they have been keeping up with their own mortgage payments. When landlords fail to do so, those renting have very little legal protection when bailiffs turn up without notice to turf them out.
- ❖ Big thanks to BHCC
- ❖ Bring it in as soon as possible x 4
- ❖ Bring it on!
- ❖ Enforcement is the key aspect.
- ❖ Fully support the proposed scheme.
- ❖ I rent, so would be crazy not to support these proposals.
- ❖ I rent. Please adopt as soon as possible.
- ❖ In our interests to support the scheme.

- ❖ Like to see this adopted quickly.
- ❖ Looking forward to the scheme being adopted across the City. Thanks for letting me have my say.
- ❖ Looking forward to this being adopted.
- ❖ Many thanks for the interview/sharing my views.
- ❖ Pleased to be asked my views by a very knowledgeable interviewer. Re Q10 Social media please.
- ❖ Really pleased to be interviewed about this.
- ❖ Seems very comprehensive to me. Interviewer took quite a time to go through it.
- ❖ Thanks for the interview x 15
- ❖ The scheme is incredibly detailed. My interviewer and I chatted for about 40 minutes - I had a lot of questions!
- ❖ Very detailed proposals. Very patient interviewer took us through it all.
- ❖ We rent, so bound to be in favour.
- ❖ We rent, so bound to support scheme.
- ❖ We rent, so it will help us.
- ❖ We rent, so this scheme is in our favour.

Letting/ managing agent

- It's a blunt instrument to begin with. I don't agree with the concept of charging every landlord in an area based on the idea that you cannot think of nor fund anything more efficient to achieve your stated aims - which is to drive higher standards and 'catch' any properties that are poorly maintained. A 'hotline' email address would provide you with more leads at a cost that does not run into millions of pounds.

Landlord of property in Brighton & Hove

- All rental property should be brought up to a good standard. If one part of the building is under HMO, then all of it should be brought up to the same standard.
- All your questions imply that licensing is a forgone conclusion, regardless of opinion.
- In my experience, tenants with long suffering genuine issues, seldom have them fixed or have to wait years before it is done. It is not the licensing that will fix this. If unacceptable basic living conditions such as damp, no heating, leaking roofs etc. are to be fixed by poor landlords there needs to be a mechanism whereby the tenants themselves can actually go to the council, provide evidence of improper conditions, and the council impose penalties on those landlords failing to comply. This targets the problem landlords and not all the good ones.
- This scheme will probably cause resentment and problem where-ever it is introduced. Yes, sadly the council has negated its own duty to build homes for the homeless and taxing those in the private sector who do provide is disincentivising. Some tenants are irredeemably high risk 'trouble'. Q Who houses these 'hot potatoes' who get passed around. To mix a metaphor the council is proposing to confuse 'apples with oranges'. And landlords do not have the legal powers to speedily evict. Cannot justly be held to account.
- Do you have clear evidence that the existing scheme in Moulsecoomb & Bevendean has had a positive effect. Without that evidence it makes it hard to justify either retention of the existing scheme or introduction of the new scheme
- Don't know why you are asking this question as Hove has had the scheme in place for as long as I can remember
- Has any thought been given to the possibility that this might reduce the availability of rented accommodation across the city? The housing stock will remain the same, but the number available for rent may decline.
- HMO house prices will rise as will rents.
- Houses with HMO licences attract a premium price because there are planning restrictions meaning effectively no more in the 12 wards. Will this become the norm city wide?

- I am a landlord in the town with seven properties that are fully licensed under the small HMO November 2012 regulations. - In general I support the roll out of licensing to all let properties in the City, implemented correctly it would push up standards. The standards need to be applied equally to all properties including University managed houses, Housing associations, Charity accommodation, etc. - The council cannot ignore the Airbnb problem, currently Airbnb is a way round licensing and planning restrictions. Some Airbnb properties in the town are causing residents considerable distress with their loud music and parties. Properties let for more, than perhaps a month a year need to be licensed. - The councillors need to realise that the costs a landlord faces in implementing licensing will ultimately be passed onto the tenant. The councillors need to be able to justify the license fee to the constituents / tenants in their wards. - I must question how the housing team is going to manage City wide licensing, with potentially 27,000 properties to be licensed, the team has struggled with the 2,700 properties in the five wards that were licensed in November 2012. - The existing HMO standards are sufficient and my view is that there is little to be gained from changing the existing standard, again I question if the housing team has the resources to revisit every small HMO property that already has a full license. - The disappointment is that with the council's presentation in December 2016 there were still roughly 20% of the 2,700 small HMO properties still to be issued with a full license. Now this is after four years, the housing team need to make greater effort to enforce the standards, visit the properties or relax the regulations. - Reduce the price for those of us that have small HMOs that already meet the full standards and we have a full HMO license. Over £600 per property for a property that already meets the standard is excessive. - Vital that article 4 planning remains in place in the affected city wards, otherwise we will be swamped with HMO houses. - Housing team need to limit rooms in the roof or ill thought through extensions for HMO student properties. Trying to jam 6 students into a house designed for 3 or 4 makes for sub standard living accommodation. - Enforcing minimum room sizes in all properties will reduce the rental housing stock in an already crowded and expensive city. By implementing a city wide licensing the council are playing into the hands of the developers building literally thousands of new purpose built student rooms, although of a high standard these bedrooms at often £250 a week are beyond the means of most students. - Licensing is sold to the electorate on the basis of improving anti social behaviour, the landlord has few powers short of eviction to prevent anti social behaviour. If a landlord evicts a tenant for anti social behaviour that tenant will invariably, due to his poor history have to be housed by the council. - I would like to see some evidence that poor landlords have been prosecuted or that really poor properties have been brought up to a higher standard, there are no figures in the consultant reports. - As landlords we operate in a free market, tenants have an option to choose the property that best suites their needs, their price, location and standard. Property to the East or West of Brighton falls in price dramatically. - The government is talking about bringing in licensing on a country wide basis. In Brighton and Hove we should ensure that we meet possible forthcoming UK standards and not just implement a local standard. The inspectors in 2012 visiting HMO were variable. Landlords often felt that it was a gamble as to which inspector they got, there needs to be more consistency in training plus an easy to use arbitration process. - Wash basins in rooms, remove this requirement.
- I believe that you should focus on the areas that are of concern and not use such a sweeping licence scheme. A lot of small caring landlords will get caught up in this net and all the red tape it entails.
- I feel that the discrimination that the Council takes towards tenants/landlords of HMO properties would not be acceptable against any other group. Lots of people cannot afford to live in Brighton and Hove, and are pleased to live in shared housing. Licensing of some properties, and refusing them to neighbouring properties is unfairly awarding extra value to some properties, and potentially negatively affecting the value for some long-term residents if they later choose to sell.
- I would not object to the scheme, if there were no licence fees to pay.

- If this is lending for HMOs then it should apply in the areas where HMOs are prevalent. A 2- 4 person property is not an HMO. This will drive up already ridiculously high rents in our city.
- Including properties of only 3 tenants is too small and too onerous on landlords who just have one property. It penalizes non commercial landlords and doesn't help to improve rubbish and noise problem
- It sounds like the scheme would be a very blunt instrument, I don't have much faith in the council to make significant improvements.
- It's a step backwards for Brighton as a City. It will push rents up and victimise those most at need. It does not solve the underlying problem of a few tenants who have bad behaviour which needs to be dealt with directly - the landlord isn't the police force nor a surrogate parent. Their obligation should be to ensure a safe, comfortable and suitable place to live, but it can't be to control behaviour of other people - what do you actually think they can do, throw people out on the street? They don't have a legal right to do that! So stop victimising landlords and instead look about how to work together to sort out the problems in the city and think about fining those who do wrong not those who try their best to do right.
- It appears to be fairly comprehensive and fair.
- Just keep in mind that you don't need a sledgehammer to crack a nut. I think this whole scheme is excessive and is applied heavy handedly.
- Landlords will put up rents to cover licensing fees. If anti-social behaviour, landlords can only evict as they don't have powers to control tenants. Councils do have those powers and should use them. Landlords evicting tenants only moves anti-social problem to other areas and doesn't solve problem. If more houses licensed as proposed, council will be busy processing those applications and rogue landlords will operate without interference. The council should look for rogue landlords rather than punish all landlords with extra costs.
- My past experience of larger HMOs is that the council staff could be very heavy handed. This does not bring about a good relationship with private landlords who are vital to the housing supply in Brighton & Hove. Several years ago it was said that private landlords provided 70% of the housing in the city. I don't have the current figure, but it must have increased. Please take into consideration that some landlords like myself who are past retirement age will simply sell-up because they don't want to deal with further bureaucracy
- Not that I can think of. It is important that this brings standards up without punishing those who do comply and have good/high standards. Good landlords should be recognised and used as an example, without assuming all landlords are poor.
- Party houses and Airbnb both unregulated causing huge nuisance value don't pay business rates BHCC need to address this problem now
- Please listen and comment to the evidence presented by the National Landlords Association. Across the country there is no evidence to suggest HMO Licensing stops or prevents the HMO problems.
- Review fees and only cover properties of 4 bedrooms/tenants and above
- Scrap it, just have the mandatory national scheme.
- Tend to agree only if you include Holiday Let properties and Airbnb's as well which are more of a problem with ASB, otherwise tend to disagree
- The cost; if we are to suddenly find the money for the licensing it means we will not be able to carry out improvements in the same tax year.
- The definition of HMO has no place in licensing or rental properties. Properties which are two or more stores, occupied by three or more people who are not from the same family and who share a kitchen, bathroom or toilet. What is a 'family'? Being part of a family or not part of a family is irrelevant in the appraisal of accommodation standards. 'Who are not from the same family' is very discriminatory terminology and has no place in housing standards assurance. It is indefensible that families should be expected to live in accommodation of lower standard than people who are 'not in the same family'.. Whatever that means. The safety and quality

standards of all houses of two or more stories throughout the city should same standard for all people irrespective of their sexual or otherwise relationships. Further the bar should be set quite high and BHCC must lead by example in quality standards (beyond basic HMO standards) it demands of the private landlords it purchases accommodation from.

- The implication this will have on the rents!
- The proposal does not address the current issues of privately let to tenants or Airbnb and substandard properties increasing risk of health and safety and enjoyment of local residents.
- There are lots of consideration for landlords surrounding mortgages and house purchases: Which houses can or cannot become HMOs? It is not really very fair system based on 50m radius or existing usage. Mortgages are very expensive for HMOs, and much less secure driving up costs for landlords and their tenants than typical Buy-to-Let mortgages. HMOs still have a massive stigma with local residents, and are often contested just on the grounds of the label, nothing to do with the landlords' reputation or standards. Professional sharers and unusual households become HMOs when their standards of living are often much better than students and yet they are lumped under the same category - HMO. This is unfair on professionals who the have to compete with students for the same accommodation, which becomes scarcer and more expensive because of the licensing and planning rules. Planners are biased against HMOs. Families who want to house share can't have more than one tenant without being an HMO - this wastes valuable potential living accommodation in the city. HMOs can be anything from seedy bedsits (most people's conception) to very high standard rental accommodation - this isn't reflected in the now derogatory label 'HMO'. The process with licensing and planning separate is unwieldly, costly, time consuming and unfair - no actual criteria match between national HMO standards for accommodation and the planning requirements
- There is a fundamental flaw in the argument to introduce additional licensing across the city. I have seen nothing that persuades me that licensing all rented properties will drive up standards. The vast majority of landlords provide good quality rented properties, which are needed in the city to help the housing crisis. The council's attention should be focused on improving the relatively small number of poor landlords and their properties. If a licensing scheme needs to be introduced, which I doubt, the scheme should be free but if a property is found to be defective then charges should be applied at that stage against those landlords i.e. don't penalise the majority for the actions of the few. The majority of landlords want to provide a good property and service for their tenants, this proposal won't encourage those who don't to comply. In addition it certainly cannot be right that failure to license a property where one is required is a criminal offence. I am particularly concerned that the Council is only supposed to be able to charge a fee to cover its costs. By my calculation, as there are approximately 40,000 properties to be licensed at around £500 each, the income to the council will be c£20m over 5 years. This is an enormous amount of revenue for a scheme that is not needed. The city needs private landlords but this scheme will not deter the 'rogue landlords' but could well deter the good quality landlords who are already being hit by an increase in stamp duty and an increased tax burden. Please reconsider this ill thought through scheme.
- Think about the bigger picture please. Fewer Landlords mean higher rents. Money that could be spent on improvements going to the Council.
- This consultation is no more than a questionnaire, written to produce a positive response. It is extremely unbalanced and not fit for purpose.
- This is simply a revenue raising exercise. Everyone knows this
- You haven't taken on board that licensing of SFDs, if implemented, it will impact on tenants many of whom are already being faced with rent increases due to recent government policies regarding private sector landlords. If it costs, on average, £100 per year per property the tenants most landlords will pass this cost onto the tenants.
- You intend to do this, whatever the consultation process reveals and questions are biased. If you ask a question like do you want things to improve? Everyone is going to say yes. It is just a

process of getting the answers you feel you need.

- You're going to do it anyway, what I find a bit disgusting is how you value the tenants in an HMO more highly than ordinary families. Why only licence tenants from different families when there are more likely to be children in normal rented family homes? The scheme should apply to all properties that are rented out I don't know why it is selective. Some of the regulations in the current scheme are ill thought out. Sinks in every bedroom, why? Focus should be on safety, fire regs and include annual fire alarm checks and log books and PAT testing and means of escape rather than sinks in bedrooms and extra plug sockets. The council should work with Gas Safe to list online gas safety inspection certs in the same manner as EPC' so anyone can check that the house is safe online at anytime, why not have an area where parents of student tenants or tenants themselves can have a look at the electrical condition report, PAT testing, Fire log, GSI etc. For the millions of pounds the council will get from this it's probably possible to build a site to deal with this.

Local business

- I don't like the plan at all and believe it is the wrong approach
- Similar licensing required for private lettings.
- ❖ Good work BHCC. Thanks for the interview.
- ❖ Looking forward to having these excellent proposals in place across the whole City.
- ❖ Pleased to be asked my views. BHCC doing a good job here. It will ensure the smooth running of the rented sector and boost the City.
- ❖ Quite sure that this will not solve everything overnight but is worthy of support and will bring success in the medium to long term.
- ❖ Similar schemes up and running in other parts of the City mean that this will be a success too.
- ❖ Thank you for the interview.
- ❖ Thanks for getting my take on the proposals.
- ❖ Thanks for letting me have my say
- ❖ Thanks for taking my opinion into account
- ❖ Thanks for taking my views into account.
- ❖ Thanks for the interview and good luck with the scheme.
- ❖ Thanks for the interview x 3
- ❖ To be adopted as soon as possible please.
- ❖ We support the proposals.

Other

- BHCC just needs to do much better at enforcing existing national tenancy legislation, + the provision of County Court legal support for tenants.
- More council housing needed to provide homes to poorer people who struggle to be accepted by private landlords and whose rent is very expensive.
- Please note that as we are a specialist food rather than a housing organisation, we are not able to answer the questions in detail.
- There are too many rented properties and far too many underused second properties (holiday homes) which prevent young people and poorer wage earners from even being able to get flats etc. I like the concept of Airbnb, but the houses should be vetted like guesthouses are - though perhaps with less pressures on them, and be proper homes not rental properties
- We need to ensure the costs are not passed on to tenants. Landlords have shown themselves to be unscrupulous and driven by a desire to profit with very little work and cannot be trusted an inch.
- You have not considered tenants' rights, rent regulation or the regulation or prohibition of agency fees.

Not stated

- No comments

9. Please provide any further comments you have about the proposed Additional Licensing Scheme

Home owner

- An excellent initiative much needed. And of course please introduce a similar scheme for Party Houses.
- Anything to monitor HMOs is good, as long as it is maintained and not just a rubber stamp process with no teeth.
- As I have already stated, you don't go far enough with the fees charged, and in particular the exclusion of party houses. Party houses use residential facilities, waste disposal etc. and can cause a lot of noise for residents. These should be classified as HMOs and be subject to the same regulations, that is they should be licensed. For HMOs, there should be a scheme that requires landlords to show where furniture, refrigerators, freezers etc. are being dumped so as to avoid fly tipping.
- Better publicity, name and shame and prosecute poor HMO owners and put them on black lists after any prosecutions.
- Changes should meet costs
- Excellent for poorly maintained properties - usually 3 or more rooms. 2 rooms in owner / occupied properties should be excluded I hope the council will not bring owner occupiers into this scheme as they could have a worse housing situation than already exists
- Find out all those owners of accommodation that is used for party houses and charge them too.
- I don't like it - will discourage landlords to rent; the proposed term is far too long; will result in less housing available
- I have included - but think given the high rents tenants have to pay there should be higher expectations of landlords so that renting can be more safer and a more stable option for people
- I reiterate you must have regular unannounced enforcement by inspection.
- I strongly advocate for an exemption for cooperatives - we need to encourage this form of low cost housing in the city.
- I would like to know what you propose to do about one property in particular, and what charter you have for renters in HMOs.
- It is important that the council has sufficient staffing resources to enforce the scheme
- It will fail because these things always do.
- Limiting the scheme to "properties of two or more storeys" might be inadequate. We have a house next door to us that has been divided into three flats - two downstairs with one occupant each and one student flat upstairs with six occupants. It is the upstairs flat which causes problems but it is unclear if it is covered by this scheme.
- My full support if whilst improving standards of private tenancy also gives residents generally in an area confidence with HMOs being well managed by landlords. Will there be regular check on landlords? I have doubts who and how regularly will licensing standards be monitored. That is who will ensure landlords do maintain? Will it be left to reports or will there be regular checks on standards when licence issued?
- Stop it
- The scheme needs to look at small HMOs in the round. It is not just a relationship between managing agents, landlords and tenants asked to tick boxes in a licence agreement. The needs and rights and responsibilities of neighbours should be taken into account and they should be given the right to challenge the granting of licences to multiple households with multiple noise producing devices living in small terraced houses.
- This should have happened years ago. It gives protection for tenants. Tenants also need to be made aware of who they need to complain to if a property isn't up to standard. Lots of people in

these properties do not speak English as a first language or are looking for a cheap place to live and these people seem to put up with the conditions they are living in as they can't afford anything else and are not aware that there are standards that these properties have to meet.

- What is the packing density? Why have you not been clear about this?
- Why are Party Houses not included? Why doesn't the Council investigate the landlords/owners of the thousands of privately rented flats and houses that are used for party houses, but are not classed as HMOs, and charge them too?
- Would this cover hen/stag party houses?
- You need to make sure landlords are held to account for their tenants' behaviour when they take inadequate steps to combat it.

Private rented tenant in Brighton & Hove

- Another cynical scheme purely to generate more income.
- Do not allow
- HMOs discriminate against those who do not live in nuclear family units. Although this legislation is presented as protecting those in rented accommodation, because of the cost to landlords of the licensing scheme and the reduction in the supply of rented houses, it is experienced primarily by tenants as a rent rise. It seems ridiculous that a group of unrelated adults living together need more state protection than a family with several children. The constant publicity around reporting HMOs has made those who have formed households with friends feel that they are not wanted in their neighbourhoods and are under surveillance. Renters in the city face very real problems such as high rents, insecurity and abysmal housing conditions, however, HMO legislation will not tackle these. Rather than focusing on properties according to the household makeup, the council should think more imaginatively about the criteria they use to regulate problematic parts of the rental market. For instance, short term tenancies are harmful to everyone - for tenants they mean regular evictions and rent rises, whilst proliferation of such tenancies disrupts and destroys communities. If the council was to focus its regulation on short term lets, it would encourage landlords to offer longer tenancies which would be beneficial to all.
- Honestly, the thought of losing my current lovely home and having to split my non-blood-related family apart because of HMOs fills me with a mix of terror and sadness. I really hope that time is spent considering not all house-shares in Brighton & Hove are utilised by students, and not all student houses are occupied by noisy, party animals. Brighton & Hove is a community and population of such a diverse people. I've never lived in a place with so many different personalities, lifestyles, thoughts, ideas. I really believe that rolling out HMOs in this way is going to cause a huge rental housing crisis in an already expensive and hugely competitive rental housing market. I would hope you are consulting with residents in existing HMO areas to see if anything has actually improved, also speaking with smaller, local estate agents, private landlords and tenants (both student and professionals) to truly understand the pros and cons here. This is why I've taken the time to fill this survey in, I want to ensure that my circumstances are represented because I feel that it's important to remember not all larger rental properties are occupied by noisy students and not every professional over the age of 30 wants to pay over half their wages to live in a solitary shoe-box.
- I just think it will mean more money to pay
- I strongly disagree with this scheme for reasons in my survey. This can be tackled in and under current regulations directly without affecting residents, and the council's pocket themselves. Think about it!! It makes no sense whatsoever.
- I think a licencing/register for all residential use properties where the property isn't the owners' principle home should be registered with the local council. I also think a clearer understanding of the use of the property i.e. left empty, used as a holiday home by the owner, used as holiday let or privately rented should be monitored. Maybe a sliding scale of rates and penalising for under

use and incentivising for long term tenancies where the landlord manages the property well and looks after tenants should be considered.

- Only greed from the council
- Stop it
- Think it's a good idea in principle - does restrict the number of properties for professional sharers which is not so good.

Social housing tenant in Brighton & Hove

- Tenants are complaining about landlords should essentially be protected like whistle-blowers. They routinely face the fear of being made homeless, or having this situation is made worse through making complaints. Some tenants live in fear of their landlords. Some landlords both private and social housing landlords have been known to damage the physical and mental well-being of the tenants with no recourse for the tenants. There needs to be a method of reporting, and checking that these landlords are living up to their responsibilities especially those who receiving housing benefit from their tenants. The taxpayer should not be putting money into the hands of landlords who run properties that are either unfit for human habitation, or poorly managed to the point of damaging the physical and mental well-being of tenants. I would like to see a fine of up to the entire value of the property and or a prison sentence of up to 10 years for landlords who continually fail in their duties to tenants. Tenant should also be allowed to prosecute landlords under the equalities act and the human rights act.

Live in a shared home or HMO

- No comments

Letting/ managing agent

- No comments

Landlord of property in Brighton & Hove

- 2012 scheme - 88% of properties inspected and conform. No justification for re-licensing. Any problems should be resolved by other means - selective licensing - the consultation report when analysed does not justify licensing at all.
- As a landlord of a small HMO I find it odd that you did not send me this consultation or contact me via the landlord register that you hold. We have no idea what's happening with the current scheme which runs out soon. Last time I had to ask for feedback from the previous consultation under the freedom of information act.....
- Biggest loss of amenity in Queens Park area in recent time is massive new recycling bins on streets. Eyesore. Makes it look like industrial estate. Difficult to walk down street. Was already unnecessarily difficult with babies/young children when can't park anywhere near your home. Double standards. Discriminating against PRS landlords. Need to apply same standards to Council/effect of council's actions as do to PRS landlords and their tenants. Proposed scheme will mean good tenants have increased rent because others do not use existing remedies against delinquent landlords. Penalising good landlords and their tenants.
- Get some staff on board to deal with it. The last scheme was a mess, site visits took over a year.
- I am not actually against licensing in principal and am against poor standards for tenants, but am concerned about the costs. Having been through the process to license my property a couple of years ago, I am conscious that some of the requirements are over and above what I would do if I was living in the property myself and not renting it out - these works can be costly (e.g. fire doors). The standards also seem to change fairly regularly so yet more costs are incurred for the landlord.
- I feel that you need to concentrate on the larger properties and the unscrupulous landlords and the properties that have been divided up into tiny rooms to cram people in. Small time caring

property owners are getting caught up in all this and being asked to make, frankly ludicrous, costly alterations to tick boxes. A little more common sense and leeway would be appreciated from the inspectors. I have a three bedroom townhouse with three tenants. It has one bathroom/toilet and a further toilet on the ground floor. I have been told I must put a sink in the downstairs toilet which entails running pipes past a staircase from a utility room at the back of the house to the front. Bearing in mind there is a sink on the same floor and the house was built like this and has been used for 40 years. If I rented it to a family or lived there myself it would be perfectly fine but no. Apparently it is my responsibility to ensure they wash their hands - how am I supposed to police this? It has crossed my mind that I could just lock the toilet and deny access and that would be ok. Where is the common sense here?

- I have no further comments other than the cleanliness and tidiness of a rental property should be the responsibility of the tenant. Repairs, renewals and maintenance the landlords.
- I manage some properties in the existing areas covered by the additional licensing, and was happy to have the opinion of Council Officers relating to the condition of the properties. However, I think the continued pursuit of these landlords for additional fees etc. is doing nothing to improve the standard of properties that have so far ignored the scheme. There seems little point to the extension of the scheme in the in these areas, and the idea of extending it across the whole city seems like a lot of work for little return. If the scheme is intended to be cost neutral, then surely as Landlords will wish to push the costs on to the tenants it can only lead to increased rents for tenants who by definition are probably those who can least afford the increase!
- I want to be the best landlord I can be and am already an accredited landlord with the National Landlord Association. I don't need the council charging me a fee to come and check. Just give me a check list of things to do and I will ensure I am doing them. Your new fee will eventually get passed on to the tenants as extra rent, especially as the government is now taxing landlords more, so profits are reduced already.
- I'd rather spend the money and time fixing real issues at a property like fitting eco boilers, insulation, fixing wall ties not putting a silly little sink in the toilet.
- Important - A minefield! - by labelling flats as licensing letting units it may:- 1) make mortgaging and re-mortgaging more difficult because of building society rules cover 'commercial' activity; 2) ditto make mortgaging difficult if the whole city is labelled an anti-social action area! 3) Cause immense and complicated legal problems with leaseholders also may be able to forfeit leases under the new nomenclature - all 3 will reduce flats available to rent - Q. is this what you want?
- Is this scheme really necessary? There are some problem properties, but they are so few, and could be dealt with individually by existing staff or perhaps a few extra. Compared to some cities, Brighton & Hove has very few problems. You are intending to use a sledgehammer to crack a nut
- It's a money making scam - I feel very sorry for my tenants - I own 4 small BLT units in Brighton - I will pass such costs onto my tenants
- It's a waste of time and resources a scheme is already in place
- Just had HMO passed having spent £55,000 doing works over and above your HMO licensing standard to have additional conditions imposed which are not in your HMO document. How can this be?
- More common sense needed to be applied in granting HMOs - over extending properties or unsuitable areas. Also people should be able to see a list of licensed HMOs and I know there are more in our area that I imagine have not been registered.
- There is a fundamental flaw in the argument to introduce additional licensing across the city. I have seen nothing that persuades me that licensing all rented properties will drive up standards. The vast majority of landlords provide good quality rented properties, which are needed in the city to help the housing crisis. The council's attention should be focused on improving the relatively small number of poor landlords and their properties. If a licensing scheme needs to be

introduced, which I doubt, the scheme should be free but if a property is found to be defective then charges should be applied at that stage against those landlords i.e. don't penalise the majority for the actions of the few. The majority of landlords want to provide a good property and service for their tenants, this proposal won't encourage those who don't to comply. In addition it certainly cannot be right that failure to license a property where one is required is a criminal offence. I am particularly concerned that the Council is only supposed to be able to charge a fee to cover its costs. By my calculation, as there are approximately 40,000 properties to be licensed at around £500 each, the income to the council will be c£20m over 5 years. This is an enormous amount of revenue for a scheme that is not needed. The city needs private landlords but this scheme will not deter the 'rogue landlords' but could well deter the good quality landlords who are already being hit by an increase in stamp duty and an increased tax burden. Please reconsider this ill thought through scheme.

- Put fines in place for antisocial behaviour and deal with this properly. By all means give tenants some protection if their landlords don't meet standards for things like safety but the additional licensing scheme is totally the wrong 'solution'. Plus, spreading this around the city just means that wider areas deal with 'challenges'. Why not operate as in other countries and give additional support to areas popular with students, or ask the universities to be more responsible in providing liaison officers with actual powers to evict people off their courses if they receive consistent complaints.
- If one part of the building is under HMO, then all of it should be brought up to the same standard.
- Suspicion that it is primarily a money making scheme for the council.
- Terrible bureaucratic idea - more paper pushing, less engaging.
- The council is only taking action via 2 of the 6 conditions required: Poor property conditions and Anti Social Behaviour - none of the others apply. Students are in already licensed HMOs so action against ASB for noise and rubbish can already be taken, however some of the council estates are in appalling states, abandoned vehicles, rubbish etc. This proposal does nothing to counteract the ASB in normal but deprived family living areas where there seems to be no sense of community spirit to mutually clean up the area and make it nicer to live in.
- The description of the scheme says that landlords will be given assistance dealing with ASB (listed as one of the outcomes on page 4). However the detailed documents do not describe what help the council will provide. It just lists extra responsibilities for the landlord. Are any extra resources to be provided as part of the income from the scheme (e.g. noise patrol, cityclean help etc.)? There is a new condition over ceiling height and room sizes. This has been shown to be unenforceable (Nottingham vs Parr) so wonder if it should be removed or more discretion (e.g. say "rooms with sloping ceilings should provide appropriate accommodation"). Without this, think there will be number of appeals/legal costs for council and room size is something that the tenant can see/judge for themselves (unlike safety issues which they may not have the skills to judge and where regulation definitely has a place). I have a bedroom in a currently licensed property as a single room - it has a double bed, chest of drawers, wardrobe and desk/chair. It is on edge of the new rules (I haven't measured as tenants are there so can't be sure which side of 6.5m with head height) and it does provide good accommodation, especially when viewed with the rest of the house. Other areas, such as sinks, have common sense "appropriate" terms added - this should be done here (or looks like will go to appeal and be done there at cost to council/landlord and uncertainty for tenant!) There is a new request to give tenants information on waste/recycling (e.g. fly tipping penalties). I have looked on B&H website and the fly tipping page does not give these. Could the council prepare information in a standard form for this and the other information they wish to be given to tenants. Currently tenants sign to show they have seen a number of items (e.g. gas safety, rent guide) this could be added to this list.
- There has been no visibility on how the fee structure has been arrived at or how it compares

with other councils.

- This should be used for standards only not as a money making scheme.

Local business

- Excellent initiative. Good for tenants, local community and landlords.

Other

- I am very concerned about the amount of homelessness in the city. No one should be living on the streets in a civilised country. I would like to see more properties where people can live in smaller groups than hostels, which tends to exacerbate disagreements between different types of homeless needs (those with alcohol issues dislike those with drug issues for example). These homes might need some sort of warden or support system and certainly help for people to get support for other issues exacerbated by homelessness. If people could live in safer environment I think it would help them to get on their feet again and be less of a problem re sleeping in shop doorways etc. The charities are doing an excellent job, but there is so much more need than they can deal with.
- If you would like more information about our response or about the city's food poverty action plan please contact Brighton & Hove Food Partnership
- I'm so glad that the council is taking action to better the lives of residents in private accommodation. During my three years in the city I was in three different privately rented flats, and most of my friends and colleagues were in HMOs. It is so expensive to rent in Brighton, and agents and landlords sometimes use the demand to shirk their responsibilities, figuring (correctly) that if the tenant decides to take their money elsewhere, it will be easy enough to find new tenants to fill their place. Thank you for helping fight back against these practices.
- No scheme, thank you!

Not stated

- No comments

Selective licensing Scheme: Findings from the Questionnaire

A total of 792 responses were received during the 12 week consultation period:

- **Consultation Portal:** A total of 293 responses were received via the council consultation portal. This total includes 192 responses from people living in the 12 wards
- **Door-to-Door Survey:** A total of 500 people were interviewed in the 12 wards by an external agency commissioned by the council to complete the survey during the consultation period.

2b. Please provide any additional comments, including any comments you have on the proposed conditions themselves.

Home owner

Living in the 12 wards

- 8.1 needs to read "him/her" not "him" consider using gender neutral wording
- Each property should be required to display licence number on outside of property plus letting agent details
- Enforcement by landlords and the council are very difficult. Problems only come to light when neighbours report ASB for example, dumping of rubbish etc. The council needs to respond quickly and effectively to such complaints. The rest is lip service and will not make a big difference to the standard of privately rented properties. Renters also need to take responsibility for where they live and how they live and where are the standards that they are supposed to adhere to? It's very hard to get rid of tenants who do not respect their living places or their neighbours.
- Good people already do this and rubbish ones don't, doubt the scheme will affect outcomes for tenants
- I do not trust landlords and am very concerned about the state of the private rented market in the city.
- I have seen the success of the borough wide scheme operating in the LB of Newham and believe the Council's proposals form a first step to replicating that success here
- I think a body should be set up (voluntarily) to check all houses, private and lets
- I think it is difficult to raise the standard of privately rented properties, but the council should show commitment to doing so. A licensing system is an approach worth trying.
- I think the conditions are sensible and give a level of protection to tenants and landlords. I do have concerns that taking enforcement action is not one of the council's greatest strengths, so in reality, will this licence make a difference...?
- I welcome the licensing of private rented housing in the city centre, to improve standards for the benefit of tenants and local residents. But in the last few years there has been a big increase in unregulated holiday lettings through web sites like Airbnb. The Environmental Health Department say HMO licensing legislation does not cover holiday properties as the length of stay of the occupiers is not long enough to qualify as a primary residence. But some landlords now let for long periods through holiday websites to avoid private sector regulation. For example, in my street there are four terraced houses let through holiday websites. The house next door is let through Airbnb.com by the owner who lives in South Africa with only a cleaner supervising the property; these houses have been let to students for periods of three months. In London, holiday lets over 90 days a year require planning permission. I suggest Brighton & Hove City Council ask Government for this 90 day planning limit so that longer periods are covered by the proposed new licences.
- If you wanted to improve standards you would have gone after rogue landlords as a prominent housing association suggested. This is so obviously a money-making scheme whose cost will eventually be passed on to tenants. Yes a tenant's tax.
- In our street alone several landlords have increased their tenants' capacity without consulting the council and then have asked for retrospective approval once they have been caught out.

Many landlords (who live out of town) are just interested in get as much money as they can at the cost of the quality of life of those living in the vicinity of the HMO so adding additional measures is unlikely to make any difference. I feel that these proposals are not strong enough and landlords will continue to push the boundaries at the cost to those who live locally.

- Landlords need to understand that they cannot get away with charging huge rents for substandard properties
- Licence conditions must be rigorously enforced. Too many times have I seen licensed HMOs which are not up to standard and in which the occupiers are having a negative effect on the neighbourhood.
- My comment is where this leaves host families who take in language students, or indeed other students. This is an important part of the economy especially in the summer months, and there appears to be a shortage of host families. Please could it be made clear whether this would apply to them or not. I think that it ought not to apply to host families, as the main problems with HMOs do not occur when there is a permanent family residing in the property concerned.
- Please also apply these standards to people renting out properties as Party Houses.
- The Housing Act 2004 does not specify how an "area" for selective licensing should be defined. But it is clearly intended that it should be more or less homogeneous in relation to the demographic criteria referred to in Section 80. There is no reason why an area defined by a political boundary, such as a local authority ward, should be homogeneous in these respects. East Brighton ward, for example, ranges from the Whitehawk Estate in the north to the East Cliff Conservation Area in the south. Data are not normally recorded by local authority ward. A more robust and consistent evidence base is provided by the LSOA data from the ONS which many local authorities, including Blackburn, Bournemouth, East Staffordshire, Hastings, Havering, Luton, Manchester, Newcastle, Pendle, Peterborough, Scarborough, Telford, Thanet, Woking, etc. have used to justify proposals for selective licensing. It may be that a local authority ward is demographically homogeneous. But unless this can be shown on the basis of the finer evidence that freely and easily available, it is open to legal challenge whether the designated "areas" are consistent with the intentions of the Housing Act 2004.
- Private rented housing needs all the safeguards currently provided to HMOs so that tenants and neighbours are protected.
- Tackling ASB is essential, as is over crowding (as not only is it a fire risk, it can also lead to increased noise) - ASB is often a problem where we live from HMO's where unfortunately the students concerned seem to have the attitude that this is a student zone (this has actually been said to us) with no consideration that their neighbour's may have to go to work the next day or have a life of their own and would actually like to get some sleep. We have an HMO next door to us and 3 behind us. Really the high density of HMO's in this area just doesn't work, the landlords benefit and neighbours suffer. I understand there's a housing crisis but more halls of residence need to be built.
- The conditions will only be meaningful if properly enforced
- The current licensing standards are not enforced or audited hence the appalling state of the HMO housing stock where conditions in many areas are declining annually.
- The legislation alone for both landlords and tenants ensure that a property is fit for purpose. If a property is not fit for purpose, surely tenants would not be attracted to it. Tenants have strong rights these days in terms of housing and as such if they were living in unfit conditions, the council would know about it accordingly. I feel a BHCC Accreditation scheme is probably a more suitable option rather than a licensing route.
- There are plenty of measures in place without this
- There needs to be a mechanism which clearly identifies the relationship and responsibilities of the landlord, not only to their property but its relationship (and accountability) to the community in which is situated. Having experienced anti-social behaviours from two HMO's in my road, there has got to be a way of making landlords more accountable. Personally, I think the

- proposed scheme doesn't go far enough.
- This will inevitably adversely effect good landlords, forcing them to sell to less scrupulous landlords, and reduce the quality of housing available, or increase cost to renters.
 - To improve the standard there will need to be enforcement of the licence conditions to ensure compliance.
 - We lived next door to a flat which had damp from floor to the ceiling. The gardens in the rented houses have massively overgrown gardens, rubbish dumped in them.
 - Welcome conditions around waste management and property condition but are there resources to enforce these - given what I have experienced (until recently) living surrounded by rented housing in poor condition with piles of rubbish outside
 - Where a flat is leasehold it would not be within the power of the landlord to keep the outside of the property in good repair or to carry out removal of graffiti, or to keep any grounds in good condition. These are the responsibilities of the freeholder and therefore the landlord cannot be required to accept responsibility for them.
 - Why are Party Houses not included?
 - ❖ A good way to help the rented sector and the fears of homelessness. Support.
 - ❖ A very important issue for the city. BHCC are to be supported in trying to find housing solutions for us all.
 - ❖ A well thought out scheme that seems to have covered all aspects of supporting and improving the rented sector in the City.
 - ❖ Agree with the scheme
 - ❖ All in the rented sector need good rules and regulations to make sure that they are being treated fairly and their accommodation is clean, safe and fit for purpose.
 - ❖ Always more needs to be done to ensure that the rented sector in the city has appropriate support and regulations to ensure fairness, actions and equality. This proposal helps.
 - ❖ An excellent proposed scheme from BHCC, covering a huge range of important points that go into making a successful and fair rented sector in the city.
 - ❖ An important issue for our city. BHCC clearly pulling out all the stops here to reduce the risks of homelessness and to create better understanding and working practices between landlords and tenants.
 - ❖ Anything that supports equally the landlords and tenants is to be supported. These seem very good proposals.
 - ❖ As it is doing well in other parts of the city, I support the proposed scheme.
 - ❖ Benefits landlords, tenants and our local community
 - ❖ Best if BHCC kept out of this
 - ❖ Best if BHCC kept out of this one. Feel it will result in less landlords and higher rents.
 - ❖ BHCC are really trying their best I suppose but I would rather that they kept out of this matter. Could well result in fewer landlords, fewer properties to be let and hence higher rental costs.
 - ❖ BHCC are to be supported in their efforts and successes in regulating the private rented sector. It is in the interest of all tenants, landlords and the wider community that we have an efficient, well thought out scheme.
 - ❖ BHCC doing a good job on this one and are to be supported. I know that schemes are working well in other parts of the city and I am sure that they would work here too, to the benefit of landlords, tenants and the community.
 - ❖ BHCC should keep out of this. Better to leave it to the market rather than self imposed rules.
 - ❖ BHCC should let the market operate and only have a very light touch approach in the rented sector.
 - ❖ Brilliant proposals! Lots of hard work must have gone into this and it seems to have produced a sensible, fair and workable scheme. Support.
 - ❖ City council really doing their best to solve problems around the rented sector and I support their efforts.

- ❖ Despite the proposals being patiently and well explained to me, I do not support the scheme. Unnecessary red tape in my opinion.
- ❖ Do not support. In fact, I feel that the proposed scheme will end up with fewer landlords and higher rents for tenants.
- ❖ Doing nothing is not an option.
- ❖ Ensure tenants are able to raise issues. Clarify landlord's obligation.
- ❖ Essential legislation. Rented sector must be looked after well.
- ❖ Excellent BHCC proposal that I think will have overwhelming support. Our modern and inclusive city has to have modern schemes like this one to boost the community.
- ❖ Excellent BHCC proposals. Bit surprised they are not actually in place already though.
- ❖ Excellent proposals set to a very high standard that will result in a smooth running and fair rented sector across our city.
- ❖ Fair to landlords and their tenants
- ❖ From the information seems fair to both tenants and landlords. I support it.
- ❖ Fully support the scheme
- ❖ Fully support. Fair. Reasonable. Needed.
- ❖ Go for it, excellent scheme
- ❖ Good ideas in the proposals to challenge issues involving anti-social behaviour, the rented sector and homelessness. Support all efforts to do that.
- ❖ Good proposals. I support.
- ❖ Good scheme. Support
- ❖ Good thinking. Good scheme. Will benefit all sides.
- ❖ Great proposals. Similar ones already in place and boosting the rented sector.
- ❖ Great scheme. Great for landlords, tenants and the city.
- ❖ Have listened and discussed the main points with my interviewer but cannot reach firm conclusions on the scheme
- ❖ Housing policy is very complex and made around many differing needs. This proposal seems good and fair to boost the rented sector at least.
- ❖ I actually work on projects to help the homeless and those at risk of becoming homeless (not in Brighton & Hove) and do consider that these proposals are a good stab at making sure the rented sector does not have wide enough gaps for people to fall through
- ❖ I have heard about these proposals prior to the interview. I support them. The scheme is fair and well intended.
- ❖ I like the sound of the proposed scheme. It seems to be pitched down the middle and that is a good thing. Will benefit landlords, tenants, other owners and the community across the City.
- ❖ I now own but did once rent in the city. Had some difficult times with the landlords that are well addressed by this proposal.
- ❖ I once rented, now own. Certainly these proposals in the scheme would have helped me back then and will also do so for the present generation of renters.
- ❖ I own now but once rented. Wish this scheme had been in place back then. Excellent proposal that I support.
- ❖ I rented (a long time ago) and wish that these proposals were in place then. Good idea that is long overdue.
- ❖ I think that BHCC should just use current rules without more expensive consultations and red tape. Surely, the current rules are fit for purpose?
- ❖ I think the scheme is a good one and deserving of support
- ❖ If it is good enough for other areas of the city, then it is good for Preston Park
- ❖ If it is working well in other parts of the city with their schemes, it really ought to work here too, so let's go for it.
- ❖ If it works for other parts of the City, it will work here in Queens Park too.
- ❖ If similar schemes are working well in other areas of the City, bring it on here.

- ❖ Important that great effort and ideas are focused on supporting the rented sector across the City.
- ❖ Impressive proposals and I support them. Will have a positive impact on our area and the City in general.
- ❖ Is there really a need for more "red tape". Will only put up rent for tenants.
- ❖ Like the proposed scheme. Will boost our City.
- ❖ Like the sound of it, support.
- ❖ More red tape created by BHCC! Just leave it to the market, rather than interfere. This may well lead to fewer landlords and higher rentals.
- ❖ Much needed. Will give a boost to our area/City.
- ❖ Need this to be adopted as soon as possible. Excellent scheme.
- ❖ Needed and works elsewhere in the City.
- ❖ Needed over the whole City
- ❖ Needed. Overdue. Will work. Fair.
- ❖ No! BHCC should keep out of this matter. It is a commercial matter between the landlords and tenants.
- ❖ Not convinced scheme will work
- ❖ Not sure. Might it be best to leave the situation as it is?
- ❖ On balance, will be a benefit to the City.
- ❖ Our wonderful City will be helped by this scheme. Need all areas to be included though.
- ❖ Overdue. Fair.
- ❖ Overdue. Very much needed.
- ❖ Pleased that we have been chosen to have this in our area. It seems to be working well in other parts of the City and I think that it will here too.
- ❖ Probably swimming against the tide but I am not at all convinced by the case for more rules and red tape. Surely, there are enough rules in place to handle the type of issues mentioned in the documentation?
- ❖ Proposals are well worth supporting
- ❖ Proposed scheme is to be welcomed. Fairness is at the heart of the ideas. I like and support that.
- ❖ Proposed scheme is well worth supporting. Both landlords and tenants will benefit as will our local community.
- ❖ Proposed scheme sounds to be fair to "both sides"
- ❖ Reduces the risks of homelessness.
- ❖ Scheme seems to be fair and equitable to both landlords and tenants - not an easy thing to organise.
- ❖ Seems a fair deal for both the landlords and tenants
- ❖ Seems a scheme that is fair to both parties.
- ❖ Similar schemes working elsewhere, so bring them on here too.
- ❖ Strongly support scheme
- ❖ Support
- ❖ Support proposed scheme as it will bring equality in the rental market between landlords and tenants.
- ❖ Support the ideals and aspirations of the scheme
- ❖ Support the proposed scheme that is overdue. Will help the City and already works well in selected places already.
- ❖ Support the scheme. Fair. Overdue.
- ❖ Support the scheme. Long overdue if already used and working in other areas in the City. Important to keep both parties "on side" and these proposals do.
- ❖ Supports a vital part of the housing market all across the City, those who rent.
- ❖ Supports the rented sector, so important as part of our City.
- ❖ The council are clearly working very hard to develop a policy that guarantees the rights of

landlords and tenants and are to be commended for that. I support the proposal.

- ❖ The previous schemes are still working well and this proposed one will too. Will benefit both the community and the parties involved.
- ❖ The worry is that those in the rented sector, should they hit hard times, could end up homeless - BHCC to be supported on this issue.
- ❖ There is a lot to take on board and I cannot reach a quick viewpoint.
- ❖ There is an awful lot of information to digest before reaching views!
- ❖ Think BHCC should keep out of this.
- ❖ Think this will work. The proposals seem very fair, no "taking sides".
- ❖ This is so overdue. Other parts of the City have got it and so should we.
- ❖ Unsure
- ❖ Very detailed and well thought out proposals that sustain the rented sector.
- ❖ Very much needed. It will certainly help renters and flush out landlords who do little other than take money.
- ❖ Very, very aspirational. Suspect there will still be a significant minority of both landlords and tenants who, although signed up, will need chasing by BHCC.
- ❖ Well worth a go at cracking an old problem
- ❖ Will help the community
- ❖ Will probably be in the minority but I am not convinced that the proposals will make a lot of difference. Law making just for the sake of it!
- ❖ Will work and I support
- ❖ Would prefer BHCC to keep out of this one please. "Red tape" etc. will "kill" the rented sector and put up costs.

Living in other areas of the city or outside of the city

- Having once rented and now witness falling standards anything to improve conditions for both renters and their neighbours will be welcomed. I do feel however that the fees should not penalise renters as prices are too high already.
- I moved out of Hanover area as it had become a complete HMO dive! Over crowded/rubbish all over streets! Disgusting
- Licence conditions okay but it is not clear what action the council will take following inspection of the property and their opinion is that repair/improvement work is required.
- Many of the proposed conditions are beyond the control of the landlord and many are covered by other legislation.
- This further red tape will make landlords increase rents further

Private rented tenant in Brighton & Hove

Living in the 12 wards

- Afraid it will end up in an increase of already expensive rents in the city and impact upon professional house sharers.
- As long as the terms are strictly enforced.
- Council is overstretched already and unable to monitor effectively
- Depends entirely on whether enforced or not. A document in itself is just an artefact.
- Has anyone checked this with tenant organisations like Shelter, Brighton Housing Trust and considered safeguarding issues?? Have you considered these issues from the tenant side?? If you haven't consulted these organisations or considered the tenant side before creating the draft scheme policies, it is a shocking and absolute disgrace! Look at clause 1.1 where you state references must be obtained, the first clause! You immediately create a problem for anyone looking for accommodation who cannot provide references. There are any number of reasons why a tenant may not be able or may not want to provide references: - landlord may have moved away - landlord may have died - landlord may not be interested - landlord/tenant may have fallen out as tenant stood up for their right, disputed deposit or other reasons - tenant may

be in dispute with landlord. Tenants' have their own rights and should be allowed to stand up for their rights! You make tenants dependent on landlords. You make tenants more dependent on landlords. Is this right, is this fair, is this reasonable, is it proportionate? No, it is not. This is not right; it should not be like this! You should be setting basic, minimum standards, not over the top exceptional standards that create unreasonable problems. And certainly not for a basic necessity like housing and finding accommodation. I strongly object to this scheme, the way it would be implemented with 6 monthly inspections, the fact that it ignores and undermines basic fundamental tenant rights and the justification used for this intrusive regime which is biased and limited. Why should all private tenants be subject to this regime? Tenants have their own rights. Tenants have their own absolute rights. I'm not sure on what basis you assume the right to interfere in tenants' rights, tenants' rights to live in their homes. Why should all private tenants be subject to this intrusive regime with 6 monthly inspections and other random inspections? Why should all private tenants be subject to this unjustified regime, as if they have done something wrong or there is something wrong? Why should all private tenants be subject to this unjustified intrusive regime as if they are anti-social/criminals? The scheme is all about the landlords with 6 monthly and unspecified random inspections within life of licence, no consideration of tenant whatsoever in all this, their circumstances and how it affects the tenant. This scheme is overbearing and onerous. What about tenant rights, you have not considered this? What about tenant rights to live peacefully in their own homes? Why should tenants be treated like this as possible/potential anti-social criminals, subject to continuous and random unjustified inspection? The scheme is all done through the landlords, so you effectively undermine tenant rights. The costs of all this, implementing this licensing scheme, implementing housing changes, can be passed directly onto the tenant. This will lead to rent increases for those that can least afford, making rents and housing in Brighton even more impossible and unaffordable than they already are. If there is a problem, any problem at all, the tenant can simply be evicted. You don't address tenant rights, high housing costs, housing shortage that all costs can be passed onto the tenant. You cannot justify this scheme on direct housing issues so have used the trumped-up indirect issue of anti-social behaviour effectively labelling all private tenants as potentially anti-social, potential criminals, future criminals, who need to be checked-up on and inspected. The proposal has completely failed to justify that the scheme needs to be introduced across the city in 12 wards. There is no justification for this whatsoever. The Selective Licensing Scheme seems to be a cut and paste job of the 'Additional Licensing Scheme for HMOs', almost exactly the same word for word, without further justification on why licensing needs be extended to all privately rented homes. I am sure this scheme will not affect you and you would not tolerate this regime yourself. This proposal is a shocking outrageous disgraceful abuse of power.

- Having read the terms of licence I can see how this scheme would improve conditions in my home if enforced. I find that the managing agent often works on behalf of the landlord rather than the tenant and I hope that this scheme would force managing agents, as well as landlords, to comply with minimum standards.
- HMOs in some areas are the worst neighbours.
- HMO's negatively impact professional sharers that already have a very difficult time finding property to rent in the city. It should exclude 3 or less occupants.
- I can only see this as being a good thing for the city. So many local residents have been used and abused by landlords for years. More needs to be done to protect us all.
- I currently live in a flat privately rented from an individual who lives in Australia. We have just found out that our electricity system is dangerous and we are not sure who to turn to. We fear making a fuss to the landlord, because he might just get rid of us. We also feel completely unprotected regarding our deposit despite it being held in a scheme.
- I like the proposed conditions as I believe it will encourage good practice for rentals and can actually be supportive to inexperienced landlords. Generally I can see it will improve standards

for tenants and could see individuals/organisations with bad practice reduce in the sector in Brighton and Hove. I like the fact it's more generic rentals and not just targeting HMO's - what I would like to see is that it could include holiday rentals as I see that landlords are increasingly turning to short term lets where they can get more money and we could ultimately have less secure or long term tenancies for residents in the city.

- I moved to Margaret Street nearly 4 months ago I used to live above a busy pub and have experienced less disturbance than living here. There are screaming hen parties and students having loud parties until early hours I was cautioned about acceptable noise levels when I moved in and have happily stuck by them
- I think this will definitely help to tackle shoddy landlords who overcharge tenants for disgusting and unsafe properties.
- If adhered to these rules would certainly improve the safety, if not the standard overall of PRS housing and licensing is a positive idea. I have no doubt that many landlords who do not appropriately maintain and monitor the upkeep of their properties will take umbrage to many of the stipulations (that require repairs) and pass the cost of such repairs on to their tenants. This will further price people out of the already extortionate private rented sector. Some acknowledgement or provision must be made of this by the Council.
- If these proposals dissuade landlords from letting will the council pick up the slack by offering social housing
- If you could introduce rent controls also this would make a significant difference.
- It depends whether the council have the resources and motivation to enforce regulations - long-term, not just as a one-year, gimmicky initiative which gets quietly forgotten.
- It is imperative that changes are made to insure that rented accommodation is of an acceptable standard and maintained to that standard so that all tenants have a better quality of life, both physically and emotionally. Not to mention the positive affect this would invariably have on the wide community.
- It is long overdue. Many letting agents, on behalf of landlords are letting sub standard accommodation and not producing the required EPCs or replying to questions that arise over the state of the windows, or mould growth.
- It might help target so called 'rogue landlords' but what if they just pass the cost of the licence on to the tenants, thus raising the rent and making it even less affordable?
- It will mean that I incur extra cost as my rent will be increased and I am living already on a very low income. I am also aware that landlords already pay licence fees. I cannot see how I will benefit from these proposals and do not believe that it would make any difference to improving living conditions.
- Just want them to deal with dry rot in door, they have never painted exterior, we have rotting window frames, and we have some damp issues. They are supposed to be ethical landlords. They seem to waste a lot of money on fees, accountants and lawyers rather than spend on maintenance.
- Licence conditions should ensure that the property is damp/mould proofed and landlords should be able to produce proof of these works being carried out, particularly for seafront properties, where damper air and cooler conditions can cause damp/mould at all times of the year.
- Many of the conditions reflect what our letting agents for the past four years supply voluntarily, and I understand they are of above average quality as managing agents in Brighton & Hove. However, some conditions of the license do represent an improvement over what is voluntarily undertaken. If this is true at the top end of the city's PRS then I believe the license conditions could drive quality of PR accommodation up much more significantly at its lower end. The only clause over which I have immediate concerns relates to the six-monthly inspections, which chiefly relates to who these would be conducted by. Where managing agents exist as intermediaries or even themselves use third parties of even greater independence, there is little to no concern. However, I can perceive potential problems where private landlords hold a direct

contract with their tenants. Frankly I and people I know have or have had landlords we would not trust with this license obligation.

- My rent will rise if this is implemented.
- Not sure which of these conditions are not already legislated for and required by law as whenever I have moved via a letting agency these conditions have been met.... maybe the licenced is aimed at those not using agencies.
- Risk of increased rent from landlords, as well as more red tape. At the end of the day, the tenants will suffer.
- The conditions as stated appear comprehensive
- These proposals do not go anywhere near far enough to protect tenants and provide good quality housing. For example, energy efficiency; it is already required that landlords provide EPC certificates, but all this does is describe the efficiency of a given property. It does nothing to actually improve it. Until recently, I lived in a flat that had fallen into severe disrepair. The window frames had rotted away to such an extent that there were gaps of 1-2cm around the windows, through which wind and rain would enter the property. Things would blow around the kitchen, and of course during the winter the heating had to be on all day as the heat would immediately escape, resulting in an annual gas bill of £2,000. I had pots and pans in the hallway catching rain that leaked in through the skylight. I tried for three years to get the landlord to carry out repairs and he refused. Finally, when I wrote a formal complaint, he evicted me. In my mind, this landlord should not be granted a license, but I see nothing in these proposals that would prevent such a license being granted, even after such reprehensible behaviour. The requirements relating to the management of the property need to be much more specific. For example, what constitutes "good repair"? That is far too open to interpretation in my view. And crucially, it ought to be explicit that landlords cannot evict tenants because they have asked for clearly necessary repairs to be carried out. I'd also like to see this linked to the Landlords and Tenants Act. Currently, this is a pointless piece of legislation, as it cannot be enforced. My old landlord was demonstrably in breach of his obligations under the act, but was able to evict me when I pointed that out. These licenses should only be granted and/or renewed if the landlord is keeping his/her obligations under the law.
- These things are already covered by the renting contract and law. How is a landlord to control anti-social behaviour?
- They should also link in to the fees letting agents charge prospective tenants.
- Think it's an excellent idea and badly needed for tenants, landlords, council and police - safety measures by landlords for their property and tenants. I think the proposals are a very good idea, particularly tackling and addressing anti-social behaviour, which makes tenants and landlords lives a misery. Inspections of properties should be a basic legal requirement anyway-similar to Care Quality Commission inspections of care homes. I fully support proposals.
- This can't come soon enough for us. Our landlord is generally reasonable but does not take care of these buildings. Our communal areas have not been decorated/renovated for at least 40 years!!
- We have consistently had problems getting our landlords to carry out even basic and essential repairs and maintenance; current landlord tells us to move out if we don't like conditions. A mandatory scheme might offer us the possibility of better living conditions and reliable maintenance schedule, without the constant threat of eviction
- ❖ 100% behind the proposals
- ❖ A well researched and thought out proposal that seems to tick all the boxes.
- ❖ After many years, this looks to be the best scheme on offer to both landlords and tenants. It ticks all the boxes and I support the proposals.
- ❖ An excellent scheme that will go a long way towards addressing the known problems in the rented sector across the City.
- ❖ An important step forward in managing the housing strategy of the City. I support.

- ❖ Benefits house-owners, landlords and tenants.
- ❖ Benefits me and all renters. Proposal is very detailed and covers many important aspects that go towards producing a fair and well supported rental sector in the City.
- ❖ Benefits people like me that rent.
- ❖ Better to have a regulated scheme. Support.
- ❖ BHCC really trying hard to tidy up the rented sector in the City. I fully support.
- ❖ BHCC to be commended for expanding the already existing successful schemes in other parts of the City.
- ❖ BHCC trying really hard to support and boost the rented sector in the City. Good luck to them. Schemes like the proposed one will help achieve that.
- ❖ Brighton is a vibrant, multi-cultured and diverse place and it is great. It sounds like, beneath that, there are matters that still are not so good and need to be tidied up. These proposals sound very good and I support them.
- ❖ Delighted by these proposals. Will help make the rented sector better in the City. Well done BHCC!
- ❖ Essential that we develop policies that reduce the risk/chance of homelessness - still a worry in our City.
- ❖ Excellent proposal. A very important continuation of this policy by BHCC in the City.
- ❖ Excellent proposals. Just the type of support and schemes to give the rented sector a boost.
- ❖ Fair to both parties, tackles anti-social behaviour and gives a boost to the City. Already working in other parts of the City and will do here too.
- ❖ Fair. Needed. Overdue.
- ❖ For many years, the rented sector in the City has needed to be "tweaked". BHCC are now doing this and I support them.
- ❖ Fully support scheme. Works in other parts of the City and will here too.
- ❖ Fully support the proposed scheme. It will improve the rented sector of the City and, hopefully, reduce the homeless numbers.
- ❖ Giving it a cautious welcome. Concerned it will put up rents.
- ❖ Good scheme. Private renters might only be a payment away from homelessness if they come on hard times. Vital that as much support as possible is offered to those vulnerable to that situation.
- ❖ Great that we are going to have our own scheme like other parts of the City. Will have a beneficial and positive impact.
- ❖ Has worked in other parts of the City and will here in Queens Park too.
- ❖ Have always had to rent and generally it has been trouble free but it sounds like this scheme is needed for those who are having a hard time.
- ❖ Have heard about these schemes in other parts of the City. They seem to be working well, so let us go for it.
- ❖ Helps renters
- ❖ Highly likely to benefit me as I rent. That said BHCC seem to have a real commitment to the rental sector these days - thanks.
- ❖ Homelessness and the threat of it hovers over many peoples lives in these difficult times. These proposals from BHCC are to be supported as they are a genuine attempt to "make it better".
- ❖ I am a renter, so it will benefit me.
- ❖ I know about the previous two schemes across the City and think they have helped tidy up the issues. Think this will help in Queens Park too.
- ❖ I rent and it will help me.
- ❖ I rent so agreements like this will benefit me and, in theory, my landlord.
- ❖ I rent, it will help me.
- ❖ I rent so in my interest.
- ❖ I rent, so it is important that I support the proposed scheme.

- ❖ I rent, so it will cement an already good relationship with my landlord, although not all tenants have that, so the scheme will help them.
- ❖ I rent, so it will help me and all other renters. It should produce a modern, fair and well-balanced approach to the rented sector.
- ❖ I rent, so it will help me.
- ❖ I rent, so it will help people such as me. The proposed scheme sounds a good one that should work, as similar schemes are currently working in other parts of the City.
- ❖ I rent, so obviously I am in favour. Many of the points within my tenancy are in my agreement but do understand the need for all those who rent to have them all as well.
- ❖ I rent so support!
- ❖ In our interests as we rent.
- ❖ In our interests as we rent. That said, it is in the interests of the landlords too, so it is a win, win situation.
- ❖ In these times of austerity, many in the rented sector must be worried about losing their accommodation or their job that would have the same outcome - homelessness. This scheme is an honest and practical way to do something about lessening these worries.
- ❖ It is a "no brainer". Needs to be done
- ❖ It is a good scheme that works well in other parts of the City and will help in Preston Park too.
- ❖ It must help. Formal and legally binding agreements are the way forward - across the whole City too?
- ❖ Like the proposals/scheme
- ❖ Long overdue. Have been renting for 20+ years and cannot wait to see this scheme adopted.
- ❖ Long overdue. Will help landlords and tenants and give the City a boost. Why not have the whole of the City in the scheme?
- ❖ Marvellous idea. I rent and do my best to keep my side of the deal. Most but not all landlords do as well, so that will make sure they all do.
- ❖ Might it put up rents?
- ❖ Must be worth a go. Can only benefit all involved and the City.
- ❖ Needed here. Fair. Will help me.
- ❖ Needed. Fair. Helps tenants and landlords. Helps the City.
- ❖ Needed. Overdue. Support.
- ❖ Overdue. Fair. Needed.
- ❖ Overdue. Fair. Works already in other parts of the City.
- ❖ Overdue. Solves a problem. Support.
- ❖ Pleased the scheme may be coming to Preston Park. Really it is needed across the whole City.
- ❖ Proposals sound good. Work elsewhere too.
- ❖ Proposals sound very good. Pleased to be asked my thoughts. There is a lot of information to digest but my interviewer did a good job. I support the proposed scheme.
- ❖ Scheme sounds great. Might it end up putting up rents though?
- ❖ Scheme sounds very good. Better to have agreed obligations on both sides.
- ❖ Seems fair to all concerned, so let's go for it.
- ❖ Similar schemes are working well, so it makes sense to have more.
- ❖ Sounds a good proposal
- ❖ Sounds a good proposal, interesting to hear that other parts of the City have schemes in place that are working.
- ❖ Support the scheme. Better for all concerned and the community.
- ❖ The rented sector is very volatile, so new regulations will help.
- ❖ Think this is a good proposal. It seems to cover all aspects of letting etc. and will be good for all parties.
- ❖ This area has many private tenants, so it would be a great idea to have the BHCC proposed scheme adopted here.

- ❖ This is a "no brainer", long overdue and needed. I fully support the scheme.
- ❖ Used to rent in one of the designated areas in previous rounds of legislation and it did make a difference. Quite sure it will here too.
- ❖ We rent
- ❖ We rent, so this scheme will be a help and support.
- ❖ We rent. The proposals are very, very detailed and our interviewer patiently went through them. Clearly will give a boost to the rented sector.
- ❖ Well done BHCC. These are incredibly detailed proposals that really "raise the bar" and sustain the rented sector. We rent.
- ❖ Well worth supporting and I do.
- ❖ Well worth supporting. A well thought out and fair scheme.
- ❖ Will benefit me as a tenant. Works in other parts of the City and will in Preston Park too.
- ❖ Will benefit renters, landlords and the community. BHCC have an excellent scheme planned here. Well done and thank you.
- ❖ Will give a boost to the private rented sector and give great PR to the City.
- ❖ Will help me and others who rent
- ❖ Will help renters like me x 3
- ❖ Will help tenants and landlords. This is a good and fair proposal that should be supported. The rental sector and its attendant issues need to be well organised. These proposals do just that.
- ❖ Will help the private rented sector function better, helps with the problem and anti-social behaviour and is overdue.
- ❖ Will make a difference
- ❖ Will make a difference. Well done to BHCC for making these proposals.
- ❖ Will tidy up and improve the situation
- ❖ Works elsewhere in the City, will work here.
- ❖ Worried this might affect people like me who will face rent increases.
- ❖ Yes, yes, yes! Fully support

Living in other areas of the city or outside of the city

- Change the heading of 7. Removing the word 'appliances' so it is clear it covers all electrics! 7.3: I would be very relieved to have my electric wiring and sockets tested as I know they are ancient and dubious of their safety but do not want to ask. 9: this would be useful to know before moving somewhere. 12.1: yes please encourage (in particular) students and foreigners to recycle!
- Houses should be safe and free of damp. They should have kitchens with drawers and safe sockets, gas checks. The council should be responsible for flood risks if water does not go down drain as pavement too low and drain in wrong place.
- No evidence to support this.
- There is a host of legislation which protects privately renting tenants already. I am unsure how much more protection we can add for private tenants without placing unnecessary demands on the landlord. I am in particular concerned about any additional costs that would be imposed on private landlords as a result of the scheme. This is because it is my view that most of those costs will need to be borne by the tenant in the rent. Can the council give me an assurance that any costs imposed on the landlord under the scheme will not result in rent increases in Brighton & Hove or contribute to inflation in the United Kingdom?
- There is a total chaos in tenancies management and tenants' rights protection not just in Brighton & Hove but all over the UK. Every body is turning into a landlord/landlady with the sole purpose of speculating on the housing market (and on the rental housing market, in particular for those landlords/landladies newly mandated, and /or their managing agents) to make as much profits as possible on their ever lucrative lettings. They tend to use and abuse most if not all of these conditions listed above, so as to avoid any of their obligations (repairs, notifications of changes, ever mounting excessive fees and charges, property maintenance, etc.), for their

own sole advantage whenever it suits them, and they can always get away with it. The proposed licence conditions are welcome, and long overdue, to help the local authorities, in this case, Brighton Council to step in and help to put the "Letting House" and the "landlords /landladies" unregulated industry in order.

- You should be targeting rogue landlords, not everyone! Most long-term tenants (me included) go through agencies who do the job of checking the properties are of a good standard. Is this a money-making scheme?

Social housing tenant in Brighton & Hove

Living in the 12 wards

- The conditions will make landlords accountable, finally.
- I think the largest issue for tenants will be the cost of monthly rents and by how much the rent is increased by the landlord and how often.
- ❖ Because it is in everyone's interest the scheme is a success whether they own, rent or share accommodation in the City.
- ❖ Better to have formal agreements
- ❖ Better to have signed agreements between the parties
- ❖ Both sides working together = success.
- ❖ Exactly what is needed
- ❖ Fair. Equal. Solves a problem. Worth doing.
- ❖ Fully support. Already working well in other parts of the City.
- ❖ Good scheme, support
- ❖ Good scheme, well worth supporting.
- ❖ Great scheme. I know it works well in other parts of the City and will do so here too.
- ❖ Have been given all the information, need more time to consider and will give my views online.
- ❖ Important to protect the rights of tenants and root out rogue landlords.
- ❖ Impressed by the proposals
- ❖ Interviewer left information and I will need more time before I give my views and will do that online.
- ❖ Long overdue. Much needed. Gives responsibilities to both parties. A boost for the City.
- ❖ Long overdue. Needed. Support
- ❖ Long overdue. Needed. Works well in other parts of the City.
- ❖ Needed more time to think about this, will add my views to the online portal.
- ❖ Needed. Supports rented sector.
- ❖ Overdue. Fair. Helps.
- ❖ Overdue. Fair. Needed.
- ❖ Pleased to hear that this scheme may be coming to our area. Similar ones are doing well in other parts of the City. Feel sure they will do well here too.
- ❖ Proposal looks and sounds good. It is fair to all parties and should be adopted ASAP
- ❖ Proposals all good
- ❖ Rented sector must be supported because it is so important to the City.
- ❖ Rented sector needs fair and supporting legislation like this. Similar schemes are doing well elsewhere.
- ❖ Scheme seems good. Will encourage good landlords and tenants.
- ❖ Schemes like this are already working in other parts of the City and we should have them too.
- ❖ Strongly support. Fair. Overdue. Works well elsewhere in the City.
- ❖ The City has to look after all the parties involved in the rented sector and these proposals will do that.
- ❖ The City is a great place to live in. We have become a very strong community that is very tolerant of minorities, civil rights etc. This scheme very much fits into that - fully support.
- ❖ There have long been arguments and disagreements between landlords and tenants and I think

that this proposed scheme will help to alleviate these. Fully support.

- ❖ Think it will result in fewer landlords and higher rents
- ❖ Very overdue scheme, very much needed. I support.
- ❖ We must make sure that the rights of tenants are protected and this scheme is a good start.
- ❖ Will benefit landlords, tenants and the community.
- ❖ Will make the difference. Landlords and tenants all stand to gain by the implementation of this scheme.
- ❖ Works well in other parts. Should be implemented all across the City.

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- Having to pay for a licence and ensuring conditions are met in my opinion is good practise, however the process of having to apply through planning permissions to obtain one is very difficult, there is not a lot of information about it and how it works and how you get granted or declined or what the likelihood is so makes it difficult to advise clients in the best way. If this comes into force - which is highly likely - I feel there should not be a restriction on obtaining one like there is with HMO's.
- ❖ Let's face it, homelessness is not going to go away and my eyes see increased number sleeping rough or in open spaces. So we have got to get to grips with this ASAP before there are deaths.
- ❖ Will be taking part in the scheme.

Living in other areas of the city or outside of the city

- In my experience the law abiding landlords already provide quality housing. The council already have all the process and organisations in place to be able to highlight those poor landlords. Citizens' advice, Environmental health etc. This is just a way of taxing the landlords that will comply. It's so short sighted as a lot of my landlords are talking about selling any additional home they may have if this comes into place. We and our landlords already (and rightly so) have a lot of regulations to ensure they comply to with the burden of cost always being on the landlord. With the tax relief on mortgages going, extra stamp duty and now more regulations and costs what do you realistically think will happen to the market. Already less landlords are buying property to let out, if more sell the city will have less property and other than this having an affect on social housing it will increase rents. So at the end of the day although you may feel there are issues with standard in my view the scheme will just make life all that much harder for everybody.

Landlord of property in Brighton & Hove

Living in the 12 wards

- A license is not going to improve good properties that have been rented through an agent. Brighton and Hove City Council will also not be able to monitor over 20,000 properties. Rental prices are also affected by the condition of properties and achieve less rent overall. Tenants are very likely to complain if there is an issue with a property that is managed with an agent. So the majority of issues property will not be affected by whether a landlord has an agent with management. The agent is paid by the landlord to manage the condition of the property. Why does the council also need to manage the property?
- A lot of my tenants tell me horror stories about some of the properties they have lived in recently. There are two clear issues: private landlords neglecting the house and the ability and willingness of their agents to care for the houses and more importantly, promptly attend to tenants' complaints and worries. I manage my property myself and this is really significant. From the start I have a proper dialogue which continues with my tenants and we get on really well. I pride myself on this and have, to date, not had to retain any deposits or had unhappy tenants.

The agents need some investigation - they encourage landlords to ask too high rents so that their percentage can be covered. Many of them are negligent, slow to act and frankly often useless.

- As a professional landlord in contact with many other landlords who use both agencies and direct I am aware of compliance as required i.e. gas safety and therefore do not see how duplicating compliance improves the overall standard of privately rented accommodation.
- As responsible landlords who use letting agents and also rent through the council - we already meet these criteria. We see this as another charge imposed on landlords in an attempt to dissuade people from renting out properties. Recent legislation on taxation, buy to let mortgages all are penalising us. We are just trying to invest for our retirement and provide excellent housing at modest rents - which we see as a win; win for us and our tenants. This will impose further costs which reluctantly we will pass onto our tenants
- Don't feel this shouldn't implemented across the board especially for new build properties
- Every condition listed above is already covered by existing legislation. Why on earth would things improve because BHCC wants to extort money from people who let out property.
- Good landlords already manage their properties effectively. Poor landlords will only pay lip service to the scheme and are unlikely to change their ways much. In all cases, the costs will be passed on to tenants.
- I already pay a letting agency for a fully managed service that includes all of the above. What would a council scheme provide in return for my fee? As a responsible landlord who cares about keeping good tenants, I'm just not sure what this would achieve, other than to drive costs up for everyone in the chain. Why don't you set up a scheme whereby rogue landlords/tenants can be reported and investigated and then enforce strict action against them? Surely that would be a much more targeted and effective approach and would also serve as a deterrent.
- I already pay a management fee to a Letting Agent, which is inspected annual and all necessary certificates are obtained annually, so why would I need to pay the Council £500 for doing what? If my property did not meet the necessary requirements/standards the Agents would not let it
- I am concerned that the scheme penalises many landlords who are already fulfilling the conditions.
- I am sure that HMO accreditation has already improved the standard of accommodation in these 12 wards - it would be good to have the same improvements in all of the PRS. Presumably, if successful, this might be rolled out across the rest of the City at a later date.
- I currently live in the Preston Park area and let out an extremely well maintained property to single families only. It may help in some areas but is an additional burden on landlords with a single property who already offer a high standard.
- I fear the Council is trying to make more money from landlords and I struggle to see why should a landlord license a 1 bedroom flat with 1 person!!! This is a red tape exercise and a waste of time and landlords' money and we will pass the costs to the tenants. You are not doing favours to the people you are trying to help. Go after the bad landlords. You know them all and not after everyone who is trying to make a living.
- I feel it's just another way of penalising landlords. We are kind and generous landlords who keep the rents low and properties well managed. We will have to put up the rent in order to afford the fee, which would not be fair on our long standing tenants
- I have been a landlord for 25 years in the Lewes Road area and my properties have always been in very good order and comply fully with the various safety requirements and regulations. I have never known, and nor have my tenants, of any anti social behaviour in the area. In fact one of my tenants actually gave up a council flat because the council itself refused to do anything about an unruly council tenant over a considerable period of time. Brighton as a whole does not have an anti social behaviour problem and neither is the housing stock in a poor or dilapidated condition, such as is the case in the north of England, which was the whole point of the government regulation.

- I have no problem with the licence conditions but I feel they relate to larger shared properties which are already required to have an HMO licence.
- I live in Seville Street next to a row of five agent managed HMO's. Usual grumble about rubbish in the front yards and allowed to spill on the street. Bin bags ripped by gulls and food waste, tampons, condoms scattered over the pavement. Honestly, the tenants come home and just step over their mess. I call City Clean and they come along to remove large objects like old sofas etc. I take electrical junk to the tip if I am going because otherwise it is just left. The bin men will only take black bags. The agents obviously just do the six monthly check out and take no responsibility for the state of the frontages. They need to be more hands on. Next door the students change every year because the agency crowd 6 strangers together and people never sign up for a second year. They have a 'lounge' but it is in fact the cellar and only has 7" slit windows. The HMO officer inspected last year and said it was acceptable and their kitchen alone was enough to satisfy the communal space requirement. In fairness, some of the streets 4 person HMO's have a lounge. I am sure you have heard all this before from the long term residents of HMO saturated areas. Coronation Street is especially bad in term time, more than half the houses in that little street are HMO's
- I own a council leasehold property and maintain the property to a good standard. The same cannot be said of neighbouring [council tenanted] properties. This appears on the surface as a way of bringing in some additional funds - how will these be spent?
- I think it would help with rogue landlords to ensure that they contract with their tenants to cover these matters. It feels unfair of reputable landlords for the fee to be so high when many of these conditions would be included/required in an assured shorthold tenancy in any event. If a complaint is received by a neighbour, then the council could instruct a local reputable letting agency/chartered surveyor to inspect the property on its behalf and charge the landlord a fee for that inspection; the fee should be recoverable if the complaint arises due to the tenant's unreasonable conduct. This would avoid the council having to employ inspectors. The scheme should be matched with quicker court powers for landlords to obtain from a court possession orders against those tenants who are not co-operating with being a good neighbour.
- If the licence conditions bite then the accommodation is bound to be in contravention of the regulations now. If so, why aren't the Council enforcing the law now. Most landlords will be unaffected by the scheme and for them this is an unwelcome, additional burden both administratively and financially - although the tenants will be the ultimate payers, whereas now they can contact the council for free and get any problems sorted out.
- In addition to the current tax relief changes, this is going to cause only one thing, across the board increases in rents in the area. This all has to be paid for, and will be passed onto the tenants.
- It is my experience that private rented accommodation (other than HMO) in Brighton is in better condition than in many other parts of the country. Those honest landlords that already maintain their properties to a high standard and ensure that they have responsible tenants with good references will adhere to the conditions and apply for the licence. Those unscrupulous landlords that ignore housing legislation and any of the council's current and extensive enforcement powers under the Housing & Planning Act 2016 will continue to ignore this scheme as they do their other existing obligations. The council's energy will be focused on obtaining the licences from landlords rather than dealing directly with any housing issues that arise.
- It will become a paper exercise where clever and ruthless landlords confirm enough to get the licence and relax afterwards as normal - there is also the strong possibility the fees will be 'passed on' to the tenants in a disguised form which will only serve to raise all rents generally. It could also discourage the 1 off landlord from making their property available due to cost. This could lead to properties being sold to bigger landlords and produce more of a monopoly culture.
- It will simply add costs which will be passed on to tenants / increase rent. It also penalised good landlords who already provide decent / safe accommodation.

- It's a competitive market for landlords, which means that to let to good tenants at a good rent the property has to be up to standard. Low end, substandard property is regulated by other laws already in place.
- Landlords are already subject to a large number of legislative requirements, many of which are reproduced in the license conditions. The main new requirement for landlords seems to be related to anti-social behaviour. Landlords are not necessarily qualified to deal with problems of this kind. Meanwhile less responsible landlords may well continue to operate without a license, which is unfair on those who do try to comply with the regulations.
- Looks like nothing more than a revenue raising scheme. There is not any real problem here beyond the norm and this scheme will do nothing to achieve its supposed aims.
- My flat is in Hove in a block of 20 which is managed by a local firm. Every year they inspect the building and flats every month they have a fire alarm test on the system which costs the block £800 per year. The flat itself is managed by a letting agent who are regulated by National Letting Agents Association so they adhere to all the legislation regarding the letting out of flats with gas and electricity certification so why should I pay anymore for a licence which I feel I do not need. Does this apply to all Council owned properties as well?
- My flat is well maintained and the tenants can leave with a months notice so I believe it is just a money making exercise. Prospective tenants inspect properties before they rent them and can leave if they are not happy. These proposed changes will just put up the cost of renting and make it more unaffordable for people already struggling financially.
- Nationally, Selective licensing is only supposed to be used by the councils in extreme conditions. The statistics for anti-social behaviour are highly dubious. The council is being heavy handed in its dealings with private landlords once again. Such actions undertaken by this council will significantly reduce the Private Rental Sector in the area at a time when there is an acute housing shortage. Lack of housing will reduce the numbers of young professionals wishing to move to the area. As a landlord of several professional and student properties, the council will no doubt be extracting a large licence fee from landlords who are being pressed for more taxes etc.
- Penalising good landlords with a council get rich scheme will encourage them to sell to avoid the bureaucracy that already exists
- Some of these conditions are excessive and make demands of the landlord far beyond existing requirements. "Waste and recycling" and "Tackling Anti-Social Behaviour" especially put big responsibilities on landlords that did not exist before, and "Property Management" includes some very specific requirements which would be expensive to fully adhere to. If the proposed conditions are fully implemented and enforced it will be a strong discouragement to provide private rented properties in Brighton & Hove, due to the high cost. Private landlords are not a social service and if there is no profit then there is no incentive.
- Some of this will help catch out unscrupulous landlords. However, for example, EPCs are available online and can be found by anyone. Recycling information should be provided to landlords as a non resident in that area, the landlord is unlikely to be aware of the latest recycling scheme.
- The added cost and bureaucracy will put off the caring landlord. There will be fewer properties for rent and you will find that you will be left with the worst type of landlord, even if your motives are good. Beware unintended consequence!
- The consultation report, when analysed in detail, does not provide evidence to justify any selective licensing within the city.
- The Mayhew Harper Report on which the Council is basing its case for Selective Licensing, states in its conclusion on p312 "Additional Licensing in 12 current wards does not, as yet, seem to have made much of an impact on different forms of ASB," Besides, merely issuing licences does not mean that conditions will be enforced subsequently. This is evidenced by the huge number of planning breaches which the Planning Investigations and Enforcement Team is not able to

deal with at the present time.

- There are already sufficient powers for the council to deal with problem landlords and tenants.
- This appears a wide-spanning approach, where more effective, targeted use of resources may result in improved standards. The proposals allow for a "prompted fee" and it would seem targeting properties with identified shortcomings would be a more practical solution, as opposed to throwing a net over all private landlords. For private landlords of properties within purpose-built blocks of flats another tier of management responsibility already exists and it seems the proposal for this scheme add further cost, paperwork and bureaucracy for limited actual effectiveness. It is clear that the Council is under-resourced and this seems a burdensome broad shot approach.
- This is blatantly a course of action taken by the council to extract the maximum amount of money from the people within their borough
- This should provide a means of regulating party houses and Airbnb which should be included in the proposals.
- Whilst Brighton & Hove suffers from a plethora of amateur buy to let landlords who want a 100% rent return for nil investment, it also boasts a very large number of professional landlords who care about their tenants, their well being, their happiness in their homes and who spend the rent on maintaining and improving the homes they provide - They create a long term investment in property and people, not just a retirement income and stuff the tenant. You already have enormous powers which you do not use effectively. There is currently no register of landlords/rented properties in Brighton & Hove. To bring in such indiscriminate selective licensing will cost us a lot of time and money that can be better spent on our tenants and their properties. We don't mind spending the money, we just object to spending it on you instead of our tenants. As affordable housing providers for low income earners we have a finite pot - Every £500 you take out is £500 less to spend on the upgrades. The new kitchens and bathrooms instead of every 10 years now moves to every 11 years and so on. There has to be a better way!! We are aware of the problem, we own and manage over 50 units, but we recently bumped into a house where 10 out of 11 flats in the building were owned by buy to let landlords with a max of 2 units, and they would not spend one single penny doing even basic maintenance on the building until we took them to the FTT (and won). Housing in Brighton & Hove is already more expensive per £100K invested than east London is! This will only push it up. This is completely inevitable as the buy to letters will refuse to cover the costs out of their pockets! Off the top of my head - I would suggest introduce compulsory registration of rented properties and landlords' registration. then there must be a way of making all landlords (buy to letters) become accredited landlords - - - - any who don't - are then fair game for you to chase and check on, whilst we can get on with our business without having to go through an unnecessary and costly process to merely continue carrying on our business. (Needless to say we are NLA accredited, NLA registered, carry London rental standard, ombudsman, etc. etc. we have EICR's, PIR's, PATs GST's, EPC's etc. and nausea)
- ❖ A good scheme. Both parties will benefit.

Living in other areas of the city or outside of the city

- 1) Energy Efficiency is dictated by separate legislation, in particular MEES which starts from next year which will make properties un-lettable unless improvements are made. So what is the point of the council scheme. 2) How do you manage overcrowding if a tenant moves a "friend" in contrary to tenancy and licence. You have to give notice to inspect by which time the "friend" would have gone. Most of the truly overcrowded properties are run by criminals anyway and chances are that the tenants (if not indeed modern slaves) will be too scared to say anything to the council anyway. The chances of one of these properties being reported to the council is zero. 3) The vast majority of landlords will already comply with all the safety legislation (gas tests etc.) The council is basically hitting every good landlord to catch a handful of criminals. 4) All of our tenants have a direct access to a plumber and builder, who can go ahead on all emergency

works. I know that some of our tenants who have been on AST's for as long as 20 years would find 6 monthly inspections very obtrusive in to the lives. The property is their home not just an investment. 5) At a recent meeting at the Southern Landlords Association one of the councils representatives said that the council has to deal with I believe it was about 300 calls a month (maybe less) from tenants complaining about conditions, in particular damp. However most damp issues are due to condensation which is caused by the tenants' misuse of the property (lack of ventilation and lack of heating). This scheme seems to pass all blame/responsibility on to the landlord. Damp issues tend to disappear once the tenant has moved and a more intelligent one moves in. Ask any landlord, tenants causing damp and associated damage their biggest issue. 6) Regarding utilities, denying access (e.g. for non payment of rent) is illegal anyway, this scheme would make no difference. Criminals wouldn't pay any attention to it anyway.

- Although I support licensing across the 12 wards this would be a difficult scheme to implement. Needs to apply to all properties; council run, charity run, housing associations, university managed etc.
- An initial discount should be provided for landlords that invest money and time to keep their properties in very good conditions and well managed.
- Anti social behaviour in densely populated student areas has become problematic, particularly noise pollution, these conditions should help with that as long as there are proper enforcement procedures in place
- As a Brighton landlord I feel there are better ways to control anti social behaviour and rogue landlords and tenants than selective licensing in the majority of wards in Brighton & Hove. Please find below alternative suggestions and reasons why I strongly believe that trying to apply one more additional large cost to landlords on top off many additional costs to landlords which have been applied over the last 18 months will have a dramatic effect on the supply of available private rented sector property in the Brighton & Hove area. Costs such as the phased in over the next 4 years loss of mortgage interest relief which becomes a tax on turnover instead of profit and will result in a number of highly geared landlords paying over 100% tax if they retain their properties . That is why a number of such landlords have already started to sell a number of properties and will be selling more over the next 4 years therefore reducing supplies. Loss of the 10% allowance for wear and tear on furniture etc. Additional payment of a 3 % SDLT for the purchase of additional properties. Around 160 rules and regulations that landlords must adhere to all cost large sums of money to apply. For any landlord who has a few properties the cost could amount to a few thousand pounds. This might be the additional straw that breaks the camels back. There are far better ways than selective licensing of controlling rogue tenants and landlords. A far better suggestion is to work with local landlords, letting agents and landlord associations such as the NLA and SLA who are active in the area to combat rogue tenants and landlords who will not sign up to a licensing scheme anyway, otherwise you risk good landlords deciding enough is enough and selling up a number of properties thereby making the already short supply of good rental properties in the local area even less and causing additional homelessness or the council having to put up tenants in bed and breakfast accommodation as they have had to do in places such as Peterborough at a vast expense to the council and far less suitable to tenants. Here is a list of suggestions you could focus on. 1. Prioritising housing enforcement in the 3 or 4 wards with the highest number of complaints. 2. Setting up targeted action days to deal with these complaints 3. Streamlining administration support so officers can concentrate on landlord/tenant activity 4. Improving information and advice on the council's website 5. Reviewing processes for serving legal notices 6. Improving training and development for staff on new legislation. Using the current powers that councils have to deal with anti social behaviour by tenants 7. Refocusing resources on higher priority complaints and investigations 8. Setting up a new landlord/letting agent forum and update newsletters. Letting other landlords know of problem tenants causing anti social behaviour. 9. Improving the use of IT systems. 10. Improving information sharing and joint working with planning and housing benefits and local

letting agents The Housing Act 2004 offers a range of flexible powers to councils and this range will shortly be widened with changes in the Housing and Planning Act. Local Housing Authorities should take a risk based approach and focus their powers on directly addressing the real problems in the Private Rented Sector. The Royal Institution of Chartered Surveyors has given a stark warning about the cumulative effect of the additional homes stamp duty and the change to mortgage interest tax relief on the health of the private rental sector. It says the lack of listings coming to the lettings market now - indirectly helping keep rents buoyant - mask bigger problems later in 2017. It says most of the agents who contribute to RICS regular market survey suggest their landlord clients will cut back on their portfolios in the next 12 months - and the situation continues into the future. Over the next three years, 26 per cent more agents expect landlords to scale-back their portfolio it warns. Tenants face potential rent increases of between 20 and 30 per cent as a result of tax rises hitting landlords, says a former independent member of the Bank of England's Monetary Policy Committee. David Miles, now Professor of Financial Economics at Imperial College London, says he wants the current three per cent stamp duty surcharge and the imminent start of the phased reduction of landlords mortgage interest tax relief to be abandoned. Miles says rents would need to rise between 20 and 30 per cent to offset the impact of the government's measures. Rents are going to rocket when landlords all realise the impact of S24 (as they did in Ireland when they introduced something similar but less punitive) and homelessness will increase massively as tenants will not be able to afford the increased rents - which are described in some circles as a tenant tax. I agree on HMO licensing but strongly disagree on single let properties all being licensed in Brighton. You only need to concentrate on the 2 worst areas in Brighton i.e. the Lewes Road area and around the Waterloo Street area. How can the council be certain that the problems outlined in your report of November 2016 are actually caused by single let properties and not social, council or HMO housing. Please supply the evidence.

- As a landlord I already provide housing of very good quality, having recently borrowed over £100,000 to refurbish 3 flats I rent out. I have never had any complaints about the standard of my properties. The licencing fee is an additional cost which will do very little to increase the quality of housing but will instead lead to even higher rents in what is already one of the most expensive cities in the UK in which to live.
- As a landlord of a single studio property relying on rent for my retirement income (and using a reputable managing agent), I feel strongly that the cost of licensing would be prohibitive and may be forced to sell the property. Please reconsider and adapt your plans for multiple property landlords.
- Bad landlords will avoid it, as always
- Firstly the council has not achieved its objectives in the original scheme. Honest landlords like myself comply and get punished and rogue landlords get away as always the council appears lazy and only goes after the easy targets. The scheme also discriminates I am dealing with many problem neighbours whom are more often than not owner occupiers being drug users, old and vulnerable whom can not look after their houses and in some cases people whom I am guessing have mild to severe mental issues and generally harass my tenants and accuse them of all kinds of behaviour making complaints to the council all the time when it is the tenant whom is suffering. With regards to proposed licensing conditions - References - Agents already do this. Often problem tenants actually come from the council or housing association as, ironically, they can not cope so are shipped out to the private sector. As for most references - anyone with experience knows yes they can be obtained also the most easily faked part of tenant evidence. - Tenancy Management - Already covered by any decent landlord or agent - pointless duplication of something that is done already. Overcrowding - this is common sense and already in most tenancy agreements however how can a landlord agent prevent this with bad tenants again I have viewed properties for sale that tenants have moved whole extended families into 2 bed flats without landlord consent with landlords desperate to get rid of tenants and Brighton &

Hove Council not supporting evictions, hypocrisy again. Utility Supplies - Common sense again if tenants did not have a water gas or electricity supply mine would not pay the rent. Gas - this is already required by U.K. Law pointless duplication. Fire Safety - Smoke alarms are required by law again from recent events local authorities are more of an issue. Furniture and Furnishing - again required by law Energy Efficiency - again required by law. Property Management - totally hypocritical as many properties exteriors are looked after by freeholders and if Brighton & Hove Council were not so blinkered they would realise many terrible properties are privately owned and we as landlords just don't complain against them. Waste and recycling - this is laughable we have a beautiful city that the council fails to supply adequate recycling facilities for just useless boxes with mesh tops that come off and get sea gulls pulling rubbish everywhere. Every other town / city has moved to recycle bins with lids! And where they don't fit large communal recycle bins on the road. Anti Social Behaviour - again something all decent landlords do comply with and help with as we do not want this we want an easy life and happy neighbours. Most anti social behaviour I have dealt with comes from social housing in the area however we as landlords and managing agents have given up reporting to the police or council as they never do anything. With regards to overgrown gardens, please as a council get your head out of the clouds why double standard between private homes that are appealing to rental ones that are slightly overgrown

- How will the council be able to administer and actual monitor this
- I agree that landlords should keep properties safe and in good repair - we have some problems with energy efficiency. I have three properties all in a conservation area - the cost of replacing front windows with like-for-like but double glazed sashes is enormous - it would take 10 years to recoup the cost of replacement. If we are compelled to increase energy efficiency, will there be allowances to fit cheaper uPVC? Or grants to fit proper sashes? Otherwise I'll need to sell, reducing the stock of housing. I don't think I'm the only landlord in this situation. Also, one of my properties is in a block of flats where I am not the freeholder - how would I enforce getting the freeholder to improve energy efficiency?
- I already do all these so it will make no difference to my tenants.
- I am sending a long letter of objection by email courtesy of my book-keeper. In general I only approve of genuine large HMOs having licences from the council. The 28,000 new licence scheme invades privacy on a mammoth scale - for tenants as well as landlords. Also I don't believe the legal authority for this extravaganza exists
- I can see how the requirements are intended to tackle the worst behaviours in landlords and tenants. But in tackling the worse behaviours of some, the requirements on others feel unnecessary e.g. info on bin days as a requirement. Far more seriously though, you need to think carefully about the requirement for references and whether this allows landlords to discriminate. Race is the obvious concern here, especially for those newly arrived and less likely to have refs but sad to see even in Brighton & Hove homophobia and other forms of gender discrimination is still possible. You'll need to think about this requirement through the lens of your public service equality duty.
- I consider myself to be an exemplary landlord, in other words the property I have in Brighton has always been kept to a very good standard; the property is always maintained inside and out. All new rules and regulations are adhered to, and any new law addressed immediately. The new licence being proposed is simply a money spinner for the council, any rented accommodation should be checked by you obviously so rogue landlords don't slip through the net, and so that every property rented out is up to standard, I hasten to add without charging incurring high costs.
- I do not think the proposals take into account the existing powers the Council already has to issue: (i) Improvement notices for properties which do not meet Decent Homes Standard, (ii) Litter abatement notices, (iii) Noise fixed penalty notices or confiscation of equipment, (iv) Disposal of waste directions (v) Notices to remove rubbish. If the proposals were to be

introduced they should also include short term holiday lets and Airbnb rentals.

- I don't think a formal licensing system will address the issue that you are trying to resolve. In these days of social media feedback/likes and dislikes a structured/policed version of this would be a more user accessible and friendly way to I think formal licensing will be overly bureaucratic and turn in to a tick box exercise for good landlords with the less good landlords finding a way around the process.
- I don't think having a licence will increase standards
- I feel very strongly about this as a landlord of multiple properties in Brighton and Hove since 2001. There are already the laws and regulations in place to properly maintain standards in housing that are not being implemented. I would much rather that the money and resources were spent following up on bad property management from tenants and landlords. Most landlords provide good quality housing, which the council can't supply, so they are an essential part of the housing supply in the city. There are more conditions and safer homes in the Private Rental Sector than in owner occupied housing. Just implement and manage them properly.
- I have had my current tenants for 15 years, 2 single people in two properties and do not want the additional requirements or costs
- I have little experience of this; however, having read the outline of the scheme I understand its purpose. However, policing the scheme is the important element
- It is definitely time HMO landlords were kept in check...
- It will push up the costs for tenants or mean that landlords spend less on their properties - lose, lose.
- A local Letting Agent manage two properties for me in Brighton & Hove. Both these properties belong or belonged to relatives who have either passed away or are currently receiving care in a care home. For a landlord who has a small portfolio of properties which are managed by a reputable letting agent this proposal simply adds an additional headache which can easily be resolved by taking the properties out of the rented sector and elect to put them into private ownership, realising their value now.
- Poor conditions in rented property are caused by bad landlords and having yet another licencing scheme is not going to necessarily change that. We already have legislation to try and ensure that properties are safe and living conditions are to a good standard. There has been quite a lot of new regulation and taxes imposed on the PRS over recent years, some good, some bad but the main concern we have is that a further licencing scheme will just take money off good landlords with little or no affect in improving conditions in the PRS. We personally are already thinking of selling our rented properties because of tax changes so any further costs might just make that decision for us. The council must remember that if a large number of good landlords removed their property from the PRS this would create real pressure on the social and affordable housing sector. A lot of private landlords are ordinary people who invested money in 1 or 2 properties and ensure that those properties are kept in good condition not the Van Hookstratens or Rachmins of this world. Penalising these landlords will eventually lead to killing the goose that laid the golden egg.
- Reading the draft licensing conditions, they seem like a bureaucratic nightmare. Time and effort will be spent chasing good landlords and ticking boxes whilst bad landlords will be left and too difficult to tackle. You already have powers to enforce repairs
- Selective licensing should be just that. It was not proposed by government to be a blanket scheme. Virtually no other authority has applied it in this way. Most wards in Brighton do not warrant it.
- Some of the proposed conditions seem to be excessive and should be personal choice (not imposed on the landlord) such as the recycling
- The council already has more than adequate access to rules to enforce good conditions you just need to apply them. All the extra schemes will do is catch the respectable landlords as they are already compliant with the laws and as per the current HMO scheme ignore those less

scrupulous landlords. Any such scheme will again just increase costs to the tenants as the landlords will pass the cost on and increase the value of the licensed properties.

- The Council should target bad landlords not take millions of pounds from good landlords who already obey the extensive laws covering the PRS
- The evidence is weak that the current licensing scheme is effective.
- The scheme is far too expensive
- There are already in place mechanisms for tenant complaint and redress. This level of intervention I believe would be counter productive and over complicated.
- There is nothing in the draft that a good landlord doesn't already have in place and no reputable letting agent will let a property without having copies of all current required certificates. There are so many costs to landlords of non HMO properties that it's pushing the good landlord's to re think whether it's worthwhile financially, and for the amount of pressure we already have to maintain our properties to the standard we ourselves would like to live in.
- This proposal will do nothing but reduce the number of privately available rented properties in the city and push up rents. It benefits no-one and will have little measurable effect on rogue landlords whilst punishing good landlords.
- We would seriously think about selling up as we are being crucified by the government already and what will we get back from you in return for this scheme.....you will continue to tell tenants whose tenancy has expired to 'stay put till they are evicted' until you will even consider re-housing them. Get your own house in order before you pick on us again. As for no instalments for the cost of the license.....yet another attempt to punish us. We are not all a bunch of rich people you know. This would all be unnecessary if you punished the bad landlords. While we are on the subject, thought your inspection team was increased to stop contractors from charging for work not done.

Local business

Living in the 12 wards

- No comments
- ❖ A boost to the community, well regulated rentals and less anti-social behaviour.
- ❖ As a local business, we support our local community - happy to support these proposals.
- ❖ As a local charity shop, we strongly support and appreciate the tremendous support we get from local community. Very surprised to hear from interviewer the large number of proposals that I thought were already in place. Is good thing they soon will be.
- ❖ Businesses like ours do all we can to promote the City, employ local people and encourage tourism. The sight of rough sleepers does not help that mission. I support all schemes that support those in housing difficulties. Thank you BHCC
- ❖ Excellent proposals, fully support
- ❖ Fingers crossed for it to work.
- ❖ Fully support BHCC in their efforts to solve difficult housing issues in the City.
- ❖ Good ideas. Support
- ❖ Good on BHCC. These proposals certainly are very detailed and are clearly meant to keep the interests of both tenants and landlords in mind - no easy task.
- ❖ Good scheme. Amazed many of the aspects are not in place already.
- ❖ Great idea. Fully support.
- ❖ Great scheme. Really positive it will help/work.
- ❖ Helps us and others who are renters.
- ❖ I rent, so obviously, I support the scheme. But it does seem to be pitched about right to make all parties involved in the rented sector feel valued and worthy of support.
- ❖ I rent so support! Have personally always had a good working relationship with my landlord but understand that not all tenants do, so this is needed for them.
- ❖ It has to help. Legally binding on both sides, so they and our City community all benefit.

- ❖ It tidies up and works towards a better working partnership between the landlords, tenants and the community. Fully support.
- ❖ Lots of good ideas in the scheme. Still, a bit surprised that most of the actions in the proposal are not already in place, as they are needed, so support the ideas/scheme.
- ❖ Lots of pluses in the scheme. Will help tackle anti-social behaviour. Will support both landlords and tenants and will boost the local community. I support.
- ❖ Many of our customers are in the rental sector. It is huge around here. We hear their stories and sometimes they do not appear to be getting a good deal, so good luck to BHCC with these proposals.
- ❖ Many of our customers are renters. They are important to the success of our business, so it is important we support efforts like this from BHCC to help that sector.
- ❖ Must be given a try and then evaluated.
- ❖ Needed, overdue.
- ❖ Needed. Overdue. Will work here. Support.
- ❖ Needed. Will help a serious issue. Works in other parts of the City, so will here too.
- ❖ New to the area and have an excellent relationship with the landlord. Quite sure he would be keen to "sign up".
- ❖ New to the City but enjoying life here. Not all parts of the UK have such policies on housing like this one from BHCC. Great idea to bring the landlords and tenants together under a licensing scheme. Should work well.
- ❖ Our customers are a real mixture, rich, poor, owners, renters. We support any scheme that helps any one of these because it helps the whole community.
- ❖ Our customers are home owners and renters who make the City what it is. We need schemes such as this proposed one to keep and eye on what is happening.
- ❖ Proposed scheme sounds excellent. Fair to all parties and worthy of support from me.
- ❖ Scheme sounds a good idea, supporting both landlords and tenant.
- ❖ Scheme will encourage the landlords and tenants to work together for their mutual advantage and potentially impact on the curse of homelessness.
- ❖ Simply love to work at a business in Brighton. It is a brilliant place to live. Mostly good times for vast majority ... but there are still issues that needed to be sorted. I am delighted BHCC are producing these proposals for the rented sector. Support
- ❖ Sounds and is fair on both sides. Tidies up some issues and consequences of the rental market in the City.
- ❖ Sounds like a good scheme. Private rental sector is very important to the City and the more that can be done to increase/sustain it, the better.
- ❖ Support all efforts to promote better conditions/rules in the rented sector. Well done BHCC.
- ❖ Support scheme because it will help and make a difference.
- ❖ Support this. Scheme is a good effort on behalf of BHCC to help everyone involved in the rented sector.
- ❖ The City is a great place to live and work. To keep our diversity, we needed to support all, be they rich or poor. This scheme helps those who probably will never be able to own their own home, so is very much to be welcomed.
- ❖ The reasons why people become homeless are probably complex. It does seem that some are in that situation due to a "broken" rental sector - these proposals will help fix that.
- ❖ The rental sector is enormous in this ward, so there are proportionately more "at risk". I support the efforts being made by BHCC to do that.
- ❖ There is so much pressure on housing in the City. Now there are quite a number of properties here that are costing £1 to £2 million pounds and yet we have street sleepers. We have to beef up the rules on the rented sector to do something about the latter
- ❖ Ticks all the boxes and I am ticking the boxes, or rather my interviewer is, as we talk about the scheme. Support.

- ❖ Very much in favour of the scheme. Similar ones bringing success elsewhere in the City, so highly likely to work here too.
- ❖ We are a charity shop and all the volunteers care deeply for the local community, of course mostly for those who are on the margins. This scheme is to be supported.
- ❖ We are a vibrant, diverse and inclusive City, so to ensure that continues, we need to have proposed schemes like this one that will keep an eye on the very important rental sector to the benefit of landlords, tenants and the wider community.
- ❖ We support any actions and initiatives that support our local community and customers. This one certainly does that.
- ❖ We support our customers and the local community and they support us. Very keen to see the scheme agreed. It all sounds so worthwhile and needed. It works elsewhere (or versions of it do) so will work here.
- ❖ Well worth a try
- ❖ Will bring us into line with other parts of the City
- ❖ Will definitely help our customers who rent in the local community
- ❖ Working well elsewhere in the City - this type of approach needed here too.
- ❖ You cannot help but see the results of homelessness in our area. They are in doors, against shops or just sitting down. We really need to get some action. This proposal sounds a positive start. Good luck.

Living in other areas of the city or outside of the city

- No comments

Other

Living in the 12 wards

- Having had the scheme in Moulsecoomb and Bevendean ward since 2012, we have seen the benefits of having additional licensing as a means of communicating with landlords when tenants' behaviour has been problematic. The key part of the license which has been beneficial is trying to limit the number of HMOs in an area which has seen a huge increase and related anti-social behaviour.
- I have lived in rented accommodation most of my adult life and experienced it as unregulated and wholly on the side of the landlords.

Living in other areas of the city or outside of the city

- Food banks, especially over the last year, have consistently pointed to both the cost and quality of accommodation in the private rented sector as a major factor in food bank use. BHCC's annual city tracker survey also points to high levels of food poverty in the private rented sector. We therefore strongly support this initiative to improve quality of accommodation in the private rented sector. The city wide food poverty action plan, to which the council is a signatory (at <http://bhfood.org.uk/resources>) includes this action which relates to both affordability and quality: 1B.3: Via delivery of the key priorities of the Housing Strategy "improving supply, improving quality and improving support- deliver action to increase the affordability of housing, reduce failed tenancies and reduce fuel poverty (food vs fuel pay-off major cause of food poverty)- especially in the private rented sector. The food poverty action plan also emphasises access to adequate cooking and food storage facilities as a means to mitigate the high levels of food poverty in the city. It is very hard to eat well on a budget without basic equipment. We also request, therefore that this opportunity is taken to ensure that cooking facilities are adequate. Currently the city's food poverty action plan includes the following action in relation to social landlords but we suggest this would be an ideal occasion to tackle this issue in relation to the private rented sector, and would therefore request you include something similar it in the new regulations: 3B.3 Encourage registered providers (social landlords) to ensure adequate kitchen provision in refurbishments/ developments (a) appropriate kitchen space (b) appliances to enable budget cooking; e.g. accommodation aimed at single people/couples includes a fridge

freezer (rather than a fridge with icebox)

- I do think people should be allowed to have friends or family to stay for more than two weeks per year.
- My previous private tenancy included an itinerary that was not up to date. On moving day the radiator was off the wall, there was a leak in the kitchen, several windows were broken (cracked) that had not been included, the oven and fridge were faulty and there was damp in the kitchen. The flat had part central heating (i.e. there was no radiator in the kitchen) and the sash windows had not been sealed. In the winter (particularly 2010/11) ice formed in the inside of the bathroom window. The central heating system broke down on several occasions with no hot water. Although the agents responded quickly, they only repaired the system several times before having to replace the whole thing. A month prior to me moving out (in 2014) there was a major leak from the bathroom down to the flat below. When the plumber came to look there was a significant hole in the bathroom wall from where a previous pipe had been. The flat rent was £650 and rose to £700 per month. It was one bed. A licence will (in theory) tackle the issues I faced. I believe the mould, the cold and the damp caused me health problems.
- Overcrowding - I work with hundreds of young people who are living in overcrowded properties with their parents or other family members, as they cannot afford to rent privately in the city. If you bring in legal conditions around overcrowding and these people are forced to evict them, then there is likely to be a dramatic increase in youth homelessness and visible rough-sleeping in the city.
- Terms 'affordable housing' do not apply to the elderly or homeless. New builds in sensitive areas should be council only to redress the balance. Council houses provide an income to the council; private tenancies are a drain on resources due to the level of housing benefit paid out. There should be some level of rent controls, including level of increases and tenancy terms should be vastly longer.

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

3b. Please provide any additional comments, including any comments you have on the proposed licence conditions themselves

Home owner

Living in the 12 wards

- Anti social behaviour tends to be based on the actions of individuals and the clash of differing lifestyles
- Because in leasehold properties the only thing the landlord has authority to address is the ASB. I do not know what proportion of flats in the designated wards are leasehold, or share of freehold, but in either case the landlord cannot take unilateral action.
- Depends how quickly they are enforced when tenants are anti-social. Residents often have to contact landlords themselves but the HMO licensing register often only has postal address and this makes this very inaccessible.
- I agree if implemented
- I am more concerned about exploitative landlords being controlled than anti-social tenants
- I cannot see how a landlord holding a licence is going to help here. It might help HMO landlords but will most certainly not impact on private residential landlords as they can't even visit their property whenever they like for fear of "disturbing the peace". Some of the proposals suggest that there are people in this city that are "unfit" to be landlords (or letting agents). So rather than adding more wards and property types to the proposal perhaps the Housing Committee

needs to be focused on the issue at hand and deal with the problem within the existing licensing area.

- I have lived in Bonchurch Road for 19 years, in that time the population of the area has changed from being a mix of elderly couples, young families, professionals and some students to become heavily populated with students living in HMOs. Their lifestyles are generally incompatible with those who have lived here longer and noise and mess have become real problems.
- I have lived with other 'homeowners' who don't bother to maintain a falling down building. Don't bother to put post away etc. It's not all 'dodgy landlords/ladies'
- I live in a street overwhelmed with student houses as I am near the Moulsecoomb site of Brighton University: my main concern is hygiene as students seem unable to manage their rubbish.
- I live next to a rented house used for hen and stag parties so there is noise every day it is rented until late hours
- I think it will be helpful for the council to be able to identify and contact a responsible person for each rented property.
- If there are actual housing officers who neighbours can contact with proper accountability and tenants being under threat of eviction/landlords losing licences with persistent ASB then yes. Just depends what powers they will have. I would like more information.
- It all comes down to effective enforcement. Will the council be allocating enough funds and trained staff in order to fully action breaches?
- It can't make things anything worse! People who are making money from property need to be more accountable. The flat next to us had someone smoking so much weed we couldn't have our windows open. The tenant didn't care, environmental health wouldn't help us as we weren't in the block, the police wouldn't either the landlord wasn't bothered. We had two years of absolute misery. It's exactly the same with noise, the upstairs tenant next door starts Skype calls at 10pm, the landlord's solution is to ask her not to have them so close to the party wall. The landlord knows environmental health won't do anything as it's to do with construction of building and he won't do anything to try and reduce noise.
- It is absolutely imperative that the Council include Party Houses and all rented property used as Holiday Lets not just holiday let companies but also those run by Airbnb and Uber. If all private landlords are to be included in the scheme the exceptions (which are not mentioned in your leaflet) should not include the above. The Council must have the courage to take on the anti-social behaviour caused by party houses etc. which have blighted the lives of too many people in this city. It is about time that the Council consider the impact of their decisions and the lives of residents and not just put trade first all the time.
- It should not be a landlord's duty to deal with anti-social behaviour beyond complying with local authority or police requests.
- It's the council who needs to be strong on anti social behaviour. This occurs across the board in very high quality property and accommodation. It's not just a landlord problem, or poor quality housing. In the North Laine in particular we suffer greatly from party houses and this legislation will do nothing to alter this. Being good neighbours create good neighbourhoods. Yet the council itself actively encourages antisocial behaviour by ignoring party houses, failing to provide police on the beat in known problem areas, denying such problems exist, and supporting the alcohol licenses and late night licenses that both cause and aggravate many of our problems with students in HMOs and party houses.
- Neighbours must have easy and immediate recourse to council help when things are going wrong. Having a licence doesn't mean that all the problems will just go away.
- No matter what you impose on the landlord the tenants are the ones making the noise, leaving rubbish out every day and the tenants do not keep any gardens tidy whatsoever.
- Not at all
- On paper they should but will only work if quickly and adequately enforced. Having lived in an

area where repeatedly cleared up rubbish from poorly managed properties it seems unfair that council tax payer and responsible landlords should pay the price of clearing up after irresponsible landlords and tenants - any system in place should take this into account

- Overgrown gardens can be a matter of opinion. We need more vegetation and less paving-over of outside spaces. Better for the environment and we need to collect groundwater.
- Personally I don't think this have any real impact on the issue.
- The council have done a great job in bringing HMOs under control; it is now time to provide the same protection to all tenants and their neighbours.
- The increasing number of "party houses" is causing so many problems. The streets are losing the community feel during the week and become a zoo at the weekend. Some former two and three bedroom properties are now being advertised on-line as sleeping up to 26 guests!
- The licensing does not resolve the poor and inconsistent standard of management and there is also no mandatory requirement for management so properties are unmanaged. I had to take private legal action to force a property to be managed despite asking the council to intervene. A tenancy is 10 months and current laws can take 6 months to gather evidence which is a long time to resolve issues.
- The more people you have living in a cramp environment will lead to frustration and therefore disputes within the home and outside of the home especially as many do not have living space beyond a small bedroom. It also encourages excess rubbish so occupants will not take responsibility of their mess.
- This will be dependent on BHCC employing enough staff to monitor, investigate and follow up
- This won't affect who rents properties
- We need similar conditions for Party Houses
- Why are Party Houses not included?
- Will it really be enforced
- You have no evidence of this
- ❖ Again, very aspirational. Does signing a document produce less anti-social behaviour?
- ❖ All efforts to tackle anti-social behaviour are to be supported. Littering quite a problem here.
- ❖ All parties working together must help tackle anti-social behaviour.
- ❖ Anti-social behaviour (littering) is a real problem here, so it must help.
- ❖ Anti-social behaviour is an issue. This aspect of the scheme may well have a positive impact.
- ❖ Anti-social behaviour is low here but quite sure it will help other parts of the City.
- ❖ Anti-social behaviour is, in my opinion, decreasing, certainly around here, if not everywhere in the City. However, it does blight our communities and every move that is made to tackle it is to be supported.
- ❖ Anti-social behaviour not a big problem here
- ❖ Anti-social behaviour not an issue near me but clearly is in other areas so policies such as this will help to challenge that.
- ❖ Anything that stops anti-social behaviour is to be supported
- ❖ Because rules and regulations will help reduce anti-social behaviour.
- ❖ Both "sides" working together on anti-social behaviour issues will work.
- ❖ Both parties working together with the council will challenge anti-social behaviour.
- ❖ Can only help
- ❖ Can only help if responsibilities are identified and agreed with.
- ❖ Difficult one, anti-social behaviour is a real problem but the proposals might help.
- ❖ Enforcement of the proposals concerning anti-social behaviour is key.
- ❖ Excellent. Shared roles and responsibilities/dialogue are very important in tackling anti-social behaviour.
- ❖ Expect it will help tackle anti-social behaviour
- ❖ Great idea. Identifies who is responsible when problems occur.
- ❖ I support all moves that challenge anti-social behaviour

- ❖ If enforced/carried out, will help enormously.
- ❖ In everyone's interests for it to work
- ❖ It will help. As you move around the City, you can see lots of litter etc. and noise probably an issue for some as well.
- ❖ Littering and noise can be a problem, so these aspects of the scheme can only help.
- ❖ Littering can sometimes be a problem but that is pretty much nationwide these days!
- ❖ Littering is a problem, so formal agreements on recycling etc. will help.
- ❖ Littering is a real problem, so the identification of roles and responsibilities in the proposed scheme will help. Noise nuisance perhaps more difficult to "police".
- ❖ Must help x 5
- ❖ Must help address some of the problems relating to anti-social behaviour.
- ❖ Must help, shared responsibilities.
- ❖ Must help. Litter not the main problem here, it is noise.
- ❖ Must make a difference if scheme goes ahead.
- ❖ Noise can be an issue, so will help with that.
- ❖ Noise can be an issue, so will help.
- ❖ Not rocket science, will work
- ❖ Our great City needs to be well controlled and regulated to the benefit of all. This will certainly do that for the rented sector.
- ❖ Quite sure it will help
- ❖ Really hope this tackles anti-social behaviour
- ❖ Really see this helping to cut down on the problem(s)
- ❖ Rules and responsibilities defined - good. Reduction in anti-social behaviour most desired.
- ❖ Shared responsibilities = likely to be a success.
- ❖ Shared responsibility will make for less anti-social behaviour.
- ❖ Should help
- ❖ Some parts do have quite a lot of litter/bulky litter visible, so it will help with matters like that.
- ❖ Support all efforts to reduce anti-social behaviour.
- ❖ Team playing between BHCC, landlords and tenants is a great idea. Good to tackle anti-social behaviour.
- ❖ Team playing by the landlords and their tenants has to be a good thing and will, I feel, challenge anti-social behaviour.
- ❖ Team playing to challenge anti-social behaviour is always to be supported.
- ❖ Team playing to tackle anti-social behaviour problems is a great idea.
- ❖ Team working as in the proposal is an appropriate solution to anti-social behaviour.
- ❖ The onus is still on tenants to do their part and they may well ignore what the landlords say or the instruction they have been given.
- ❖ They must help, sure they will.
- ❖ Think it will reduce anti-social behaviour
- ❖ Will certainly help
- ❖ Will definitely benefit our community by reducing anti-social behaviour.
- ❖ Will help x 4
- ❖ Will help bear down on anti-social behaviour
- ❖ Will help challenge littering. Some already do a great job on this - a minority of tenants could not care less.
- ❖ Will help reduce anti-social behaviour.
- ❖ Will help reduce anti-social behaviour.
- ❖ Will help, although littering is a massive issue across the whole City.
- ❖ Will help. Terms and conditions of the scheme need to be enforced though.
- ❖ Will make little difference
- ❖ Will not make any difference

- ❖ Will not make one iota of difference
- ❖ Yes, really hoping it has an impact on anti-social behaviour.
- ❖ Yes, will bear down on anti-social behaviour.

Living in other areas of the city or outside of the city

- Anti social behaviour is a tenant issue primarily
- Anti social behaviour is beyond the control of a non resident landlord. Most landlords would prefer to rid themselves of anti social tenants. However, it is extremely difficult to evict tenants on this basis.
- It give the council powers to indirectly as well as directly enforce improvements in behaviour so cannot be a bad thing
- The council should also do more about public areas that are overgrown - parks, verges, where private property meets public
- This will only move the problem and not hit it directly

Private rented tenant in Brighton & Hove

Living in the 12 wards

- All this will do is to get the landlord and agents telling us off and controlling our life.
- It is imperative that changes are made to insure that rented accommodation is of an acceptable standard and maintained to that standard so that all tenants have a better quality of life, both physically and emotionally. Not to mention the positive affect this would invariably have on the wide community.
- As long as the terms are strictly enforced.
- As part of an overall strategy I think it would put more responsibility on landlords to ensure complaints about their tenants are dealt with properly.
- It depends whether the council have the resources and motivation to enforce regulations - long-term, not just as a one-year, gimmicky initiative which gets quietly forgotten.
- ASB for the neighbour / tenant is terrifying to address themselves and unsupported - many (and I have) suffered in silence scared of escalating the ASB, or vendettas - or revenge evictions - all this stress, worry, anxiety does lead to emotional issues, isolation and sense of powerlessness. It is not for the tenant to address ASB - it is the landlord - it is their property and their ASB tenant - the other tenants need safe guarding and feel supported, empowered and protected. I fully support the proposals-social responsibility that should enhance all tenants lives and make the role of a landlord much clearer and defined.
- Decent landlords won't have a problem with this. Agencies will be forced to ensure that they are protecting tenants and landlords alike.
- Even if the landlord is proactive on tackling ASB current legislation means it can take a long time for anything to happen for low level ASB. Would also need to ensure additional costs to police are covered if there is an enhanced expectation for them to become involved over and above Environmental health, hard to hold the landlord accountable for tenants ASB without the civil or legal recourse and resources to help them.
- Fortunately I have not experienced ASB, but I have friends who have. Their situation is intolerably.
- HMO houses have these issues despite already having to get a licence!!
- HMOs are some of the worst places for ASB. The police statistics prove this.
- HMOs may provide some guarantee that the property is up to standard, does not guarantee the types of people who move into a property.
- I think current measures probably address this issue but not too sure.
- I think that even if the landlord has to register it can still be up to the tenant to tidy rubbish and gardens, this too should be enforced.
- It will depend entirely on whether police or council are allowed act on it.
- Overgrown gardens aren't necessarily tenants' fault; if landlords require gardens to be

maintained and grass cut they need to provide equipment - most tenants won't have lawn mowers. I'd also argue that if a landlord keeps their property well-maintained, the tenant will appreciate their effort and work to ensure the property continues to look well-cared for. It's a 2-way process. If the landlord is not concerned about regular upkeep, why should the tenant, who, effectively is being exploited to extract as much profit from the property as possible without any additional investment in upkeep. Attitudes matter, and impact on the neighbourhood.

- This is a money making scheme for the Brighton council. My rent will go up; my wages have not gone up in 12 years. So why don't you all at the council take a pay cut and live on bottom of pile with the rest of us. Then you would see that this is not a good way to raise money
- Too many student houses. Only going to get worse as Sussex increases its intake.
- With regards to rubbish and gardens - this depends on a variety of factors e.g. will the landlord absorb the cost of garden maintenance etc. themselves or expect the tenant to pay - in which case you can expect no improvement.
- Yes I think it will encourage landlords to be more proactive about resolving issues or at least seeking support. There is also potential for the Council and other supportive organisations in the city to provide services to improve conditions in PRS.
- You cannot justify this scheme on direct housing issues so have used the trumped-up indirect issue of Anti-Social behaviour effectively labelling all private tenants as potentially anti-social, potential criminals, future criminals, who need to be checked-up on and inspected. The proposal has completely failed to justify that the scheme needs to be introduced across the city in 12 wards. There is no justification for this whatsoever.
- ❖ Agreements by the two "sides" will definitely help lower anti-social behaviour.
- ❖ All will benefit from this.
- ❖ Anti-social behaviour helped by these aspects of the proposal.
- ❖ Anti-social behaviour is still an issue, so this will help.
- ❖ Anti-social behaviour is to be challenged at all times.
- ❖ Anti-social behaviour, especially littering and noise is a problem around here. Any actions taken to tackle it are to be supported.
- ❖ Anything that tries to reduce anti-social behaviour is good. Littering can be a problem locally.
- ❖ Both parties involved means it is likely to work better.
- ❖ Both parties sign in, so it will make a difference
- ❖ Can only be a good idea. Roles and responsibilities shared to the benefit of the whole community.
- ❖ Can only help x 4
- ❖ Certainly will help
- ❖ Common sense really but good to have it written down and agreed.
- ❖ Do not consider there is much anti-social behaviour around here but sounds a good initiative.
- ❖ Do think this part of the agreement is a good idea.
- ❖ Everyone will do their best to comply
- ❖ Everything we do to try to lower anti-social behaviour is good. This scheme does so in a clever way.
- ❖ Good idea
- ❖ Good thinking to formalise and write down the roles and responsibilities. Anti-social behaviour is a real downer.
- ❖ Happy for all parties to work together to reduce anti-social behaviour.
- ❖ Helpful
- ❖ I do my bit but recognise that across the City littering and noise is a big issue.
- ❖ I rent and make sure recycling etc. is done properly, not all renters do so. This will help.
- ❖ I think this "problem" is diminishing here in Preston Park but this aspect of the scheme will help.
- ❖ If both sides keep to their agreement, it might help.
- ❖ Joint agreement between landlords and tenants will certainly help.

- ❖ Like it. The scheme identifies responsibilities and will definitely help.
- ❖ Litter not so much a problem actually, noise sometimes is, so a good aspect of the proposed scheme.
- ❖ Littering a problem so should help with that.
- ❖ Littering is a serious problem all across the City. This will help with that problem.
- ❖ Littering is the main problem, so scheme will help with that.
- ❖ Might help
- ❖ More of a problem with litter than the others but scheme sounds good.
- ❖ Multiple occupancy leads to arguments about who does what on recycling etc. Formal agreements on that will help.
- ❖ Must be a good idea.
- ❖ Must help x 8
- ❖ Must help lower anti-social behaviour x 2
- ❖ Must help. Shared responsibilities are a good idea.
- ❖ Must help. We all need to help reduce anti-social behaviour.
- ❖ My thoughts are that locally anti-social behaviour is on the wane but ideas like this one will help to reduce in lower levels.
- ❖ No brainer, will help
- ❖ Noise sometimes a problem, so this will help.
- ❖ Not a big issue here but it will probably help in other parts of the City that are experiencing anti-social behaviour.
- ❖ Not a big problem (anti-social behaviour) around here
- ❖ Not a lot of anti-social behaviour here except some littering - that will be addressed by the scheme.
- ❖ Not sure this is a big issue in my immediate area but where there is anti-social behaviour, this is bound to help.
- ❖ Quite sure that everyone will comply - it is in everyone's interest
- ❖ Shared responsibilities = shared success
- ❖ Support all moves to tackle anti-social behaviour.
- ❖ Support anything that aims to reduce anti-social behaviour.
- ❖ Support anything that lowers anti-social behaviour.
- ❖ Think it will help. Noise sometimes an issue but we do live in a vibrant, busy City. Littering and its control seems to be doing quite well.
- ❖ Will contribute to less anti-social behaviour.
- ❖ Will help x 8
- ❖ Will help lower anti-social behaviour which can only be a big boost to the local and City-wide communities.
- ❖ Will help reduce anti-social behaviour.
- ❖ Will help with anti-social behaviour.
- ❖ Will help, especially with littering
- ❖ Will work
- ❖ Working together will help reduce anti-social behaviour.

Living in other areas of the city or outside of the city

- 11.1 inspections every 6months is a lot, rather invasive. Less often if things are OK and no complaints from neighbours.
- I worry that these proposals will lead to landlords evicting people without recourse due to minor problems.
- If external appearance is tidy there may be less accumulation of rubbish etc..
- No evidence to support this. Current HMOs cause most problems, especially in central Hove.
- Plants are good in floods. Plants prevent houses flooding. Our neighbour's basement flooded because they had no plants. Plants are good for air. Some tenants are disabled and can't do

gardening.

- The concerns related (noise, rubbish and overgrown gardens) tend to be responsibilities of the tenants. Perhaps landlords could ensure they screen better tenants before offering tenancy's, however, the landlord is not in the property and the property is the tenant's home, not the landlords. In order to reduce instances of anti-social behaviour this in my view should be done on a case-by-case basis involving those particular tenants and their neighbours potentially through an alternative dispute resolution service such as Brighton & Hove Independent Mediation Service (BHIMS) (I must declare an interest as a Community Mediator for BHIMS but it is a cause I support and endorse in any event). It is unfair to place conditions on landlord's which in reality are the tenant's responsibilities even if a landlord who properly screens tenants could contribute to reducing noise, rubbish and overgrown gardens. It may also discourage private landlords who use letting agents because they may feel they need to have a more direct role in relation to the property and not act through a third party. This could also affect the amount foreign investment Brighton & Hove has in the property market.
- You are targeting the wrong people. Short-term tenancies (e.g. Airbnb) are the worst as they don't care about being anti-social (parties, drinking), as they are not there to deal with the aftermath. We, on the other hand (long-term tenants who are vetted by serious letting agencies) will pay the price with increased costs that will be passed on to us!

Social housing tenant in Brighton & Hove

Living in the 12 wards

- No comments
- ❖ Bound to help with that, I would have thought.
- ❖ Can only help with those issues. Some parts really do have a lot of dumped items like beds, broken furniture on the pavements.
- ❖ Definitely will help
- ❖ Helpful
- ❖ Littering is a problem, so will help.
- ❖ Must have an impact
- ❖ Must help x 2
- ❖ Must help with anti-social behaviour.
- ❖ Needed
- ❖ Noise can be a problem but I suggest problem relating to littering are diminishing. This joint approach by the landlords and tenants will continue that trend.
- ❖ Noise is the bigger issue to littering etc.
- ❖ Noise rather than littering is the main problem.
- ❖ Ought to help
- ❖ To have both sides working towards the self same objectives must be a bonus and impact on anti-social behaviour, likely to lower it.
- ❖ Will help x 5
- ❖ Will help as both parties are signing in.
- ❖ Will help lower anti-social behaviour.
- ❖ Will help with that.
- ❖ Will help, especially with littering.
- ❖ Will help. Can be a problem (litter) around here.
- ❖ Will make a big difference for the better.
- ❖ Will make little impact
- ❖ Working together will ease anti-social behaviour problems
- ❖ Yes, both "sides" working to solve anti-social behaviour matters.
- ❖ Yes, will work as the responsibilities are outlined and agreed

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- No comments
- ❖ Common sense as more regulations will only improve anti-social behaviour.
- ❖ Good idea x 2

Living in other areas of the city or outside of the city

- We manage over 700 properties and have done for over 25 years. I can count on one hand the amount of times we have had to take action over a garden that may be overgrown. I have not experienced any other issues. We have found there to be a lot more issues from a management point of view with regard to anti social behaviour (noise complaints, rubbish) from people that rent using Airbnb or holiday lets in the buildings that we look after. Yet I don't believe this is an issue that has been highlighted. It's the load stag/hen do's etc. that are causing the problem.

Landlord of property in Brighton & Hove

Living in the 12 wards

- Again I have no problem with these conditions but they relate to larger shared properties which already require an HMO. The small houses that I rent out to families unfurnished should not fall under this scheme.
- An obvious attempt to hold landlords responsible for the behaviour of private citizens. Policing the behaviour of this nature is the job of the relevant authorities, police, BHCC environmental health and social services.
- Anti social behaviour is a real issue. I have had one group of tenants who really upset the neighbours so I asked them to leave early and lost three months rent. The relationship I have with my neighbours is far more important, it is their permanent family home, than a few months rent. I make a point now of making sure our tenants meet the neighbours and that all mobile phone numbers are exchanged.
- Any proposals need to be extended to council tenants.
- I think it would help with rogue landlords to ensure that they contract with their tenants to cover these matters. It feels unfair of reputable landlords for the fee to be so high when many of these conditions would be included/required in an assured shorthold tenancy in any event. If a complaint is received by a neighbour, then the council could instruct a local reputable letting agency/chartered surveyor to inspect the property on its behalf and charge the landlord a fee for that inspection; the fee should be recoverable if the complaint arises due to the tenant's unreasonable conduct. This would avoid the council having to employ inspectors. The scheme should be matched with quicker court powers for landlords to obtain from a court possession orders against those tenants who are not co-operating with being a good neighbour. It may help if rogue landlords have terms relating to noise, rubbish disposal and maintenance in their contracts with their tenants. However, control of rubbish disposal and overgrown gardens is not limited to rental properties (or tenants/landlords) throughout Brighton & Hove, and the council should consider a city wide scheme to address general lack of maintenance by property owners and occupiers too, together with the inconsiderate dumping of large items by waste bins.
- Having lived next to 2 HMOs that BHCC and other councils profligately purchase revolting, slum, grimy accommodation from at eye watering expense to the taxpayer there is no evidence whatsoever that HMO licensing addresses any of the issues outlined. Quite the opposite. BHCC profligate spending on revolting, soiled, grimy, "licensed HMO" B&B bedsits in the form of "temporary, emergency, accommodation". Defecation in the street, antisocial behaviour, stabbing, arson, drug dealing, abuse, innumerate emergency services visits - fire engines where there is no fire, police almost daily, ambulances when substance abusers think they have overdosed or get bored. The HMOs are lucratively sponsored by BHCC and other councils who

use them for out-of-area² placements, yet despite all the evidence BHCC refuses to act to ensure the safety and well-being of the surrounding community. BHCC actively contributes to the demise of a maligned, ignored and neglected community through its failure to act to ensure existing HMOs sponsors are reformed.

- I am not aware that any of my tenants have been guilty of anti-social behaviour. Regency ward, where I live and my rental properties are located do sometimes suffer from ASB but this is largely due to the numbers of people who come from outside the ward to enjoy its entertainments facilities.
- I cannot see that this will have any bearing at all
- I can't possibly see how this would effect anti social behaviour??
- I do see how this would help - as antisocial behaviour is a police matter
- I doubt it will be particularly effective. I expect the local authority retains powers in respect of noise, rubbish or overgrown gardens already and yet the problems created by some tenants persist. Any reasonable landlord will seek to prevent these problems occurring irrespective of any additional scheme.
- I have no evidence of such behaviour to an extent that would justify selective licensing. The new recycling bins are a good addition.
- In theory I suppose it should, but I am less sure whether it would in reality. I suppose it depends how effectively the licence conditions are enforced.
- It could reduce ASB but could also just shift it to somewhere else.
- It is not the role of landlords to police anti social behaviour, and it is wrong to make them pay for this.
- It will help keep the houses in better condition when let - but will do nothing to reduce anti social behaviour by tenants - be it noise - or not caring for the properties whilst they live there - or when they leave. You are penalising the landlords but not addressing tenants anti social behaviour
- No amount of legislation will impact this.
- Noise, rubbish and overgrown gardens are rarely an issue in private rented accommodation where one person or family live as they have a common and vested interest in maintaining good relations with neighbours and up-keeping the cleanliness, look and feel of their own neighbourhood. Where rubbish is an issue, it is the responsibility of the tenant not the landlord and in many cases the responsibility of the council to provide adequate rubbish collection facilities, wheelie bins and hoppers for rubbish disposal. All the landlord can do is encourage the tenant to adhere to rubbish collection policies.
- Oh what a tangled web you weave! If only it were true. We have had a few noise problems in our time. Usually created by neighbours, only one was our tenant. A noise nuisance from an owner/lessee is virtually impossible to stop! It can take years to resolve and then it's only an ASBO - that doesn't stop them it just keeps them quiet for a few months. Nuisance tenants - we had one- we got an eviction order against them, all it did was move the problem to someone else (you rehoused them so they become your problem - but thanks I was so happy to get rid of them and get some peace back into that block!) Seriously though - noise nuisance is as much a problem caused by insufficient noise insulation in old regency buildings as it is by bad attitude - and since no-one, particularly lessees want to pay for upgrading of noise insulation - the problem doesn't go away it just moves around - I have proof of this in Somerhill Avenue, Hove. The building is so noisy you can hear everyone walk around. In dead of night it must be horrendous; so all the lessees wind each other up - one walks around at night - underneath sounds off and makes noise during day to get his own back and so it escalates - whereas a simple order from you lot to install sound insulation would solve the problems of the last 10yrs - To evict a tenant for noise nuisance - unless it is a drunken (student??) doing it every night - is unfair, and merely moves the problem onto someone else. Prosecution, fines and education surely work far better. But as landlord we find it impossible to get the help we need from you

the council and the police to take swift action to prosecute effectively (we can't) to fine (we can't) to educate (we can't) all we can do is evict - that doesn't really help anyone. Rubbish - we educate our tenants regarding rubbish. Most of them don't understand about disposing of large items, and the system has become very complicated now, especially for foreigners. Even I get confused and have to think about what happens in which area with which bins. Overgrown gardens, - that is not a hazard and not really enforceable - How on earth can you have a go at tenants for failing to maintain a garden that is not theirs by letting it get overgrown, then go up Shirley Avenue, Shirley Drive etc. and look at some of those properties and the unbelievable amount of overgrowth on their properties - that they own!!!! A good landlord will ensure that the tenant keeps the garden under reasonable control, and also that he provides an easy care garden. We have found that tenants who want a garden generally are so delighted to have outside space of any sort that at the very least they keep it clean and tidy (if not being spectacular gardeners)

- I have been a landlord for 25 years in the Lewes Road area and my properties have always been in very good order and comply fully with the various safety requirements and regulations. I have never known and nor have my tenants, of any anti social behaviour in the area. In fact one of my tenants actually gave up a council flat because the council itself refused to do anything about an unruly council tenant over a considerable period of time. Brighton as a whole does not have an anti social behaviour problem and neither is the housing stock in poor or dilapidated condition , such as is the case in the north of England, which was the whole point of the government regulation. You are inferring that there is a big problem with anti social behaviour when this is not the case. What evidence is there that what little bad behaviour that takes place is committed by tenants in the private rented sector and not council tenants and indeed home owners! The proposed licencing of property is simply a money making scheme to raise over £13 million every few years.
- Providing that there is enforcement which I doubt will occur.
- Some of these conditions relate to actions tenants should be taking, e.g. disposing of unwanted items. E.g. if a tenant moves out and leaves a mattress is it the landlords responsibility to dispose of it? If so they should be able to charge the tenant the cost of doing so plus their time to arrange. Much of this could encourage smaller less profit making landlords to sell and ensure the bigger corporate business landlords who only see the tenant as a money making opportunity, move in. The use of words such as 'reasonably' is not helpful and does to define clearly enough to both parties what reasonable is.
- Tenants are given guidelines to be adhered to regarding noise, rubbish and overgrown gardens. The only people that seem to abuse this are the large numbers of students allocated to certain areas of the City.
- Tenants are the problem here. We landlords are the first defence against any bad behaviour. Now, if you were to licence tenants that might help....
- The council already has procedures in place for all of the above and paid for through from council tax collections. Overgrown gardens are usually plants and weeds.
- The council have all the adequate powers in place to prevent: Noise, Rubbish, Overgrown gardens and indeed a plethora of estate agents signs. Once again using a hammer to crack a nut.
- The Council, the police and other authorities already have powers to deal with the problems listed above, so the question is: are these powers being exercised? Anti-social behaviour is not necessarily caused by those living in the PRS and the Mayhew Harper Report does not provide conclusive evidence that it is.
- The main cause of trouble as I understand it is mainly the student lets which are multi occupation and the unregulated Airbnb, and as far as I can understand it these do not even need gas certificates or fire alarms. My area is residential there seems to be no problems. The rubbish in small narrow streets in certain parts of Brighton is a problem but where I am it is a wide street and rubbish is not a problem. One set of conditions for everyone is not going to solve your

problem

- The problem with the above tends to be the fault of the tenant. Decent landlords will just give up. This will result in far fewer properties to rent, while bad landlords will still stay in the sector.
- The proposal does not regulate tenants who are the cause of most of these issues.
- The tenants have no motivation - in fact the opposite if their rent has gone up - to behave any better
- There should already exist a tenants charter to allow a complaint to be enforced by law whether for anti social or poor housing conditions is this proposed scheme going to be outsourced and it will mean further rent increases for all
- Unless landlords have improved means to evict troublesome tenants, there is little they can do.
- What do you really think a landlord can do beside ask the tenant to leave and give him notice. We are not responsible to how people live and can't go and tell them what to do! Use your common sense if you have one.
- When HMO's come up for sale Agents state the gross profit from the rental yield, like selling a business rather than a house in a residential street. Ones in my area sell for more than a non-HMO property. Like for instance the ones made into eight bedders. Suggestion, in areas that exceed the 10% when an HMO is sold the licence not be renewed. So the HMO can not be taken over by a new owner and continued.
- Where is the evidence that a licence scheme will reduce anti social behaviour? Landlords have very limited authority to deal with antisocial behaviour. The council already has powers to deal with anti social behaviour. How can landlords control tenants' inappropriate behaviour, for example, beyond the curtilage of the property?
- You have not explained how the proposed measures will achieve this!
- ❖ Not really an issue here but it is in other parts of the City so must help reduce the problem.

Living in other areas of the city or outside of the city

- 1) Waste and recycling in the areas where we have our properties is done communally with street bins provided by the council. Any waste in the street is as a result of the council failure to provide adequate emptying of facilities. So the scheme would make no difference 2) Landlords, beyond a letter and eviction have no powers or according to the courts no responsibility for the behaviour of another individual. Tenants can also be subject to personal feuds between each other which can lead to false claims and evictions against innocent people 3) If the Antisocial behaviour is of a criminal/vice matter then these activities will just move out to areas where there are no licensing requirements. Such matters are already illegal and subject to police action anyway. 4) Again the biggest issue of greenery being overgrown and causing an anti social issue such as access blockage is the council's failure to properly maintain its trees at the bottom of the trunks which blocks pavements, blocks views at street corners for drivers and lifts pavements making them dangerous. The scheme will not help this. 5) Most antisocial issues are caused by drunken/drug addicted homeless and holiday lets to stag/hen nights which are outside the scope of the scheme as well, but for which the council already has powers to deal with if it could be bothered.
- A blanket coverage of Brighton & Hove is not required. It will not solve your so called problems. Concentrate all your resources on the two worst areas. It is a total waste of landlords' time and money to cover virtually all the city.
- Although it may not solve the problem itself, it may reduce the extent of anti-social behaviour.
- Anti Social Behaviour - something all decent landlords do comply with and help with as we do not want this we want an easy life and happy neighbours. Most anti social behaviour I have dealt with comes from social / council housing in the area however we as landlords and managing agents have given up reporting to the police or council as they never do anything. With regards to overgrown gardens please as a council get your head out of the clouds why double standard between private homes that are massively overgrown to rental ones that are slightly overgrown or perfect stop stereotyping and discrimination against renters and landlord I'm ashamed of the

council "Brighton and Hove council, the council that likes to discriminate and stereotype" should be new slogan

- Anti social behaviour does not appear to happen where we have our properties in Westbourne Street, Lansdowne Street, Westhill Road and Connaught Road. None of our tenants have ever complained of anti social behaviour. I can imagine that there are some areas nearer the centre that may have problems although that probably includes visitors to the area.
- Anti social behaviour is a tenant problem and would be handled by the Police and through the legal system
- Anti-social behaviour is for the police to resolve. What is a licence going to do about a wild party? By the time you have revoked it, the damage has been done.
- As a company director of 2 blocks I am concerned about vendettas, feuds and false allegations which I have witnessed 1st hand over decades. Leaseholders ~gang up and many have concealed vested interest (e.g. getting a foothold into maintenance work and disparaging other leaseholders. Due to these injustices I believe your expanded scheme will be a damaging, costly and unjust ~can of worms!
- As long as there are enforcement procedures. It's no good having the rules if you don't enforce them - e.g. regular patrols
- How will the council be able to administer and actual monitor this. Can't see it covering its costs and what will happen if in breach - monies to take people to court.
- I do not see how I am suppose to police my tenants, surely that is a job for the police or you! It makes me judge and jury
- I understand that this is the aim, but as I have not seen it in action before I have no evidence that it will reduce anti- social behaviour. I hope it does.
- If you want to see an overgrown garden look no further than the nearest council house. You can't control your tenantsso don't expect us to do a better job than you! As for anti-social behaviour...as I already stated, even if we had a tenant who breached their agreement on this you would tell them to stay until eviction
- I'm not clear how the license made on landlords would affect tenants behaviours
- It is not the landlords' job to police behaviour of tenants. Our job is to provide decent housing at fair local rents. Other authorities must take responsibility for anti social behaviour.
- It will make some landlords employ a gardener but as to anti-social behaviour, this is a society problem not a landlord's. They will have to be housed somewhere. Are you proposing to house them once evicted? Merely moving the problem elsewhere.
- I've thought about this a lot and I can't see any reason why getting a landlord to have a licence will reduce or manage antisocial behaviour. Most landlords don't live near their properties or have control over who their tenants have visit their flats. Surely if you want to manage anti social behaviour of tenants then you should do something which affects the tenants not the landlords. No landlord would want an unsuitable tenant in their property so most have lots of stringent checks in place to make sure that they get good tenants. You will still have anti social people living in Brighton & Hove they may be owner occupied tenants, council tenants, Airbnb weekenders, so why is just one section of the housing being licensed. It's because the council wants to raise a load of money and they see landlords as easy pickings. This is just a poor excuse by the council to implement something that was in their manifesto and I don't believe that any landlords' comments will be taken into account.
- Landlords have few if any real powers to reduce anti social behaviour
- Licencing landlords does not control ASB - taking money from the landlords has no effect on ASB which is committed entirely by tenants of course. Taking money in fines from tenants would control ASB - do that instead.
- Needing a license won't reduce antisocial behaviour. If someone is going to be antisocial they will go ahead anyway. An overgrown garden is not exactly antisocial - what about the elderly person with mobility issues who can't manage their own garden - they are hardly being

antisocial are they?

- No, because landlords do not have the legal power to do anything about this! Sort the problem out at source, fine the tenants or any resident in the city if they do wrong, stop this nasty victimisation of landlords, it's totally unnecessary and just causing considerable bad feeling across the city. Landlords are here providing a service and the vast majority of us do this with our tenants absolute best interests at heart. Shocking how this has blown up and how a poor 'solution' which will not resolve any of the issues is being dumped on people who don't deserve it.
- Powers already exist to deal with anti social behaviour.
- There is enough legislation in place to improve standards in the PRS. It is about enforcement. Now that the law has changed and local authorities can use money from fines etc. enforcement is the key. That way the focus can be on criminal landlords and properties where problems frequently occur instead of punishing good landlords who are members of registered national bodies and provide a quality service. Any additional costs through licensing will be passed straight on through increased rents. In addition, is there a proposal to license tenants? In my experience most tenants are decent people who want to make the rented property their home while they are living there. Just as with landlords there a few tenants who have no regard for anyone else in society. Why are they not being targeted? The licensing conditions appear to shift the onus onto the landlord completely and that is unfair.
- As a landlord of a single studio property relying on rent for my retirement income (and using a reputable managing agent), I feel strongly that the cost of licensing would be prohibitive and may be forced to sell the property. Please reconsider and adapt your plans for multiple property landlords. This seems to attack responsible landlords alongside those who are irresponsible. It is simply too expensive for those relying on rent to supplement retirement income.
- Tackling these presupposes landlords care about these things. Some (many?) don't. Success here will depend on being able to back the requirements up with effective enforcement.
- Tenancy agreements cover all of the above within the Law.
- Tenants are supposed to cut gardens but often don't bother until they leave, or are checked. However, it is in their contract that the garden is maintained by them.
- The evidence from the current scheme is weak and the proposed scheme is dry poorly targeted to achieve these aims.
- The licencing scheme will not reduce anti-social behaviour at all. "Problem tenants" who are prone to commit such behaviour will instead move to an area where licensing is not in force. Licensing does not enable the council to deal with this issue any better that it does at present, it will merely have the effect of pushing the problem from one area to another.
- The schemes is far too expensive
- There is no evidence from the consultations papers that correlate ASB with tenants as opposed to home owners. Without such information it is impossible for me to agree with this statement. Have our reputable agents undertaking due diligence on tenants why would subsequent issues of ASB be penalised against the landlord.
- This was the excuse used in Hastings. This sort of behaviour cannot be controlled by landlords or is caused by landlords. It should be a Police issue to deal with any of this.
- Unless you patrol how can it work
- Where is the link between licensing and ASB? Your documents fail to make any convincing link.

Local business

Living in the 12 wards

- No comments
- ❖ A stated aim in the proposed scheme is to tackle anti-social behaviour and we support that.
- ❖ Actually think anti-social behaviour is diminishing! But this will help too.
- ❖ Again, this can be quite a problem, especially in the side streets - litter etc.

- ❖ Anti-social behaviour - littering can be a problem, so this "joint" approach in the proposals will help.
- ❖ Anti-social behaviour can be a problem here, so all measures/proposals to do something about it are to be supported.
- ❖ Anti-social behaviour is an issue and any steps that can be taken to tackle it are to be supported.
- ❖ Anti-social behaviour is an issue and support all initiatives to reduce it.
- ❖ Anti-social behaviour not a big factor round here.
- ❖ Anti-social behaviour not much of a problem around us but all attempts to lower it are to be applauded.
- ❖ Any actions that reduce anti-social behaviour are to be applauded and backed. I do.
- ❖ Any reduction in anti-social behaviour is to be supported.
- ❖ Anything that reduces anti-social behaviour is to be supported.
- ❖ Getting all sides to work together in a positive scheme like this will help tackle anti-social behaviour.
- ❖ Good aspect of the scheme.
- ❖ Good thinking. Will reduce anti-social behaviour. Littering is still a massive challenge to the City.
- ❖ Great plan, fully support
- ❖ I am up for any schemes that tackle anti-social behaviour, especially litter.
- ❖ I support any attempts to reduce anti-social behaviour.
- ❖ I would think it would help but, again, would need feedback/evaluation.
- ❖ Important that our shopping/business areas are clean and free of anti-social behaviour. This will help.
- ❖ It has to help
- ❖ Joined up approaches often bring success.
- ❖ Littering is the main problem, across the whole City, not just here. Support actions to reduce that.
- ❖ Must be a good idea.
- ❖ Must help x 6
- ❖ Must help. People will know what is legally expected of them.
- ❖ Noise and litter are a problem. The proposed scheme will help with that.
- ❖ Really would like to see this make a difference
- ❖ Shared rules and responsibilities will bring success.
- ❖ Smart idea to have the two sides working together.
- ❖ Strongly support actions to lower anti-social behaviour.
- ❖ Team playing will bring success.
- ❖ We must be doing everything we can to tackle anti-social behaviour, especially litter. This is good and I support.
- ❖ Will help tackle anti-social behaviour.
- ❖ Will work (all working together).
- ❖ Working together will bring results and lower instances of anti-social behaviour.
- ❖ Working together will bring success.
- ❖ Yes, written agreements and commitments are a good idea. Enforcement will be the key issue of course.

Living in other areas of the city or outside of the city

- No comments

Other

Living in the 12 wards

- I don't think that the HMO licensing has had enough time yet to reduce anti-social behaviour - but there is increasing evidence that residents are able to communicate with landlords. The key challenge is implementing and prosecuting landlords who have tenants who are disrespectful,

messy or anti-social.

Living in other areas of the city or outside of the city

- It will force/forcibly encourage people (landlords and agents) to take responsibility.
- Many council tenants also create these problems, as do private tenants themselves who work long hours to pay the mortgage and do no work in their gardens allowing massive weed issues for neighbours. We need the council to act against all poor residents regardless of type of housing, although making the landlords of private tenancies responsible for their tenants would help a lot.
- To a certain extent the tenants are responsible, but the landlord must keep an eye on the general conditions
- Waste and recycling - ensuring that any rubbish or unwanted goods left behind are immediately removed would help to reduce fly-tipping, but who is actually going to enforce this condition?

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

4. The council is proposing that the scheme will last for five years. If you think the scheme should be shorter please let us know why

Home owner

Living in the 12 wards

- (If I were in favour of this) then the period is acceptable although I do not think this proposal is justified.
- 2 years..... Keep them on their toes
- A lot can happen in 5 years. Damp for example spreads very quickly.
- Concentrate on building quality housing for the low paid. Use libraries 24/24 "convert" areas for free housing. The same with parks
- Five years does seem a long time. Maybe an introductory 3 year licence and if there's consistent problems it should be revoked, then if all is okay it could be extended a further two years. I guess the council does something similar for its new tenants so why should it be such a long licence for HMOs.
- Five years seems acceptable, presumably with compliance checks during that period.
- I think every three years would be more appropriate.
- I think you will know much more quickly than five years if your scheme is working or not. If it's not working, it will prevent a more efficient solution from being proposed and implemented.
- It seems about right. Please introduce a similar scheme for Party Houses.
- It would seem unlikely that the council can finance an inspection regime over 5 years for the small amount involved.
- Longer permanent
- No fees.
- Of course the scheme should be shorter so that landlords need to review their responsibilities more frequently leading to problems arising (which from my experience there will be many) are addressed in a timely manner.
- Personally I think the scheme should be shorter - 24 months max.
- Should be at least 5 years
- Sounds a reasonable period to assess its success or otherwise.
- Sounds reasonable to gather enough data over time and to let the scheme have a chance of being fully understood and used.
- The prompted fee may be a little low as an incentive to apply as failure to apply implies a

potentially irresponsible landlord

- 'The scheme will last for five years'. What does that mean? Scheme or license? I cannot see how frequently licenses need to be renewed. I think I would prefer annual license renewal, however a pro/con discussion would have been helpful. My first sight of any of this was on a leaflet yesterday - 1 day before the deadline!!!!!! Why is that? Residents' parking has been introduced in my street without any consultation on where meters will be placed etc. - I am not happy with this council and unless you start becoming more council tax payer friendly I will be voting against you at the next opportunity.
- This is about right length of time.
- This scheme is unnecessary
- Why only 5 years? It should be on going. Students are not going to suddenly disappear from Brighton. They are always going to need accommodation.
- ❖ No idea x 3
- ❖ No opinion x 13
- ❖ Shorter license period would help "nip in the bud" anti-social behaviour.
- ❖ Three years and then take a look to see how it is working out and if necessary do some "tweaking".

Living in other areas of the city or outside of the city

- Needs to be five years.

Private rented tenant in Brighton & Hove

Living in the 12 wards

- 1 year as a trial
- 1 year then review and tweak; there will always be things you won't expect that crop up. As long as you are clear about this, people won't mind; they'd rather you got it right
- 2 years pilot seems fair (a check on where this cost is passed to tenants is required). Unclear on how these fees have been decided... should be broken down into actual costs.
- 5 years will definitely have the necessary impact, and results "negative, or positive" will in 5 years be quite clear and definite. Otherwise I think the scheme should be made permanent and a legal requirement.
- Agree
- I am in disagreement with the scheme and definitely feel if it were to be implemented that it should be shorter than 5 years.
- I think 5 years sounds about right - wouldn't it be good if us tenants could get a 5-year lease to go along with it!
- I think that maybe this cost will end up being passed onto private rented tenants through rent increases.
- I think that there should not be a scheme.
- I think the fee for the 5 years is appropriate however I feel like the council should make a midpoint check during that period to ensure that the property is up to standard and have a enforcement fee (probably less than the 460 e.g. 300-400) if the landlord does not bring the property up to standard within a reasonable timeframe. Also properties fully managed by a letting agency on behalf of a landlord should be of particular interest as quite often they will come in and paint over issues to ensure they quickly re let the property.
- I'm not entirely sure what this means. Does it mean that in 5 years time licenses will no longer be required? If so then, no; it should be indefinite. Or is it that a license should last 5 years? I would say it ought to be renewed every year, or at most every two years. A property can fall into significant disrepair in a fairly short period of time, and it seems unfair that a tenant may have to wait five years before there is any incentive for the landlord to fix the problems. I also think that referencing should work both ways; landlords should require references from previous tenants as well as vice versa. Why should all the power be in the hands of the wealthy property owners?

- It shouldn't be adopted, Full stop!!
- Shorter to see what effect it has on rents and available properties for professionals in the city.
- Should be a shorter trial
- Should be reviewed annually to ensure problem households dealt with
- The fee sounds a lot. Who pays? Is that per year?
- The landlords will pass on the cost to us the tenants so not sure if this is really a good idea. Why can't the council go after bad landlords and not bother us?
- This should be on-going as properties need to be brought up to standard and ensured maintained if left standards could drop and all hard work to get them there will be undone unless inspections would be regular. Both valued depending on what works better for council and tenant more information and insight to this is required as too positive results in other countries.
- ❖ No idea x 2
- ❖ No opinion x 21
- ❖ Seems right length to me

Living in other areas of the city or outside of the city

- 3 years - too much can change in 5 years
- 5 years seems sensible particularly bearing in mind set-up costs etc.
- Five years is a good time frame for renewing a scheme once it has past its pilot period. I would suggest that five years is too long to carry out a pilot study. It is, however, a particularly uncertain time right now and what works today may not in future. I would wait until 2020 and little further guidance or clarification on the direction BREXIT is looking to take and how this may affect our housing market and foreign investment before implementing the scheme at which point 2 1/2 year pilot with built-in review mechanisms and milestones and a qualified majority of 2/3 of the sitting Grand Chamber of the Brighton & Hove City Council should be needed to agree that the scheme is fit for renewal before it should be renewed. In the event, the pilot licensing scheme for private landlord's is believed by the Council to warrant being implemented prior to 2020, I would suggest given the uncertainty a longer piloting period to counteract any abnormalities which may or may not arise once BREXIT has been given a more concrete direction (that pilot period being in my view justified for 5 years).
- I don't think it should happen at all!
- Scheme does not work. Ignores safety needs of families. Housing for families should not have lower standards than housing for 'non' families. There should be no distinction. All rental housing should be held to same high standard.

Social housing tenant in Brighton & Hove

Living in the 12 wards

- Five years is just fine. Maybe it should be longer
- ❖ Two years and check it out.

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- 5 years is fine, as long as landlords can be guaranteed to be allowed to obtain a selective licence and not have to go through planning to do it.
- ❖ No opinion
- ❖ About right

Living in other areas of the city or outside of the city

- Another tax.

Landlord of property in Brighton & Hove

Living in the 12 wards

- !!! If any work need doing has been done why not make it longer?
- A further stealth tax on landlords.
- As already stated landlords will sell so will not want a five year fee
- At that price, 5 years is a minimum. Why not an annual fee of £95?
- Five years is fine but should be subject to review if there are complaints. Do you have a complaints panel?
- For the amounts they want to charge it should be for 10 years at the same amount as they are offering now
- I do not think there should be a licence scheme.
- I don't agree with the scheme at all and cannot see that it can work as it will still be unregulated and who is going to enforce it?
- I don't think the scheme should be implemented at all
- I don't think the selective licencing scheme for private rented accommodation (excluding HMO) should take place at all. I think it is overly bureaucratic and there is very scant and dubious evidence to suggest its needed
- I think a much more appropriate response would be to target the most-effected ward for a trial and report candidly on any identified outcomes. This proposal has all the hallmarks of being rolled-out wide scale just to be identified as ineffective.
- If you have to bring in this in then a five year scheme is better to give some stability.
- Is this an annual fee? Does this fee cover 5 years? This appears to be a very ill-thought out proposal at present and I think someone at the council has a case of the Tom and Jerry pound signs rolling around their eyes!
- It seems that five years is a reasonable time to see if it does bring in improvements. However, as stated above, it should be met with a city wide scheme that encourages everyone to respect the environment and other people.
- It should be significantly shorter i.e. not be introduced. The cost is also very significant and will burden renters even more than present.
- It should last for 5 yrs. from the date the licence is granted. If I buy a property to rent out one year before the end of the scheme do I have to pay the full £460 for one year?
- It should not be introduced at all.
- It should not happen
- No - it should not be shorter. .
- The scheme should not last any time. It is a waste of time for all concerned.
- There is no ground in law for the scheme to be implemented in the first place.
- There should be a lower price for new build properties
- Two years - after that time should be clear if scheme is really making any difference to anti-social behaviour.
- Why do my fees have to be duplicated i.e. paying a Managing Agent and the Council
- Why saddle yourself with something that lasts 5 years until you know it works?
- Will visits take place annually or at the start of the five-year scheme; maybe they should take place with every new tenant.
- You are posing a question in a manner which would give acceptance to your proposed scheme if it was answered as you require. By all means inspect properties at your will but do not charge for it. It should be noted that should the council implement any form of charge this will be passed on to the tenant in the form of a rent increase. At present my own rents are well below the norm for Brighton. My properties are well maintained one bedroom flats and my tenants, who are all recipients of some type of benefit, are happy renting from me and enjoy living in the properties. Any increases in rent may make the properties unaffordable to them. I am happy to

keep my rents low and rent to recipients of benefits but not at the cost of paying out extra charges to the council.

❖ No comment

Living in other areas of the city or outside of the city

- At the end of the day it is a money making scheme
- Daylight robbery!!!!!!!!!!!!!!!!!!!!!!
- Fine, but earlier review would be sensible to drive success in the scheme by the end of the period.
- Five years is fine
- I do not think the scheme should start at all.
- I don't think there should be such a scheme. I have two lovely one bedroom flats with highly suitable tenants who are happy with their homes and do not contribute to anti social behaviour.
- I don't agree with the scheme in the first place. I would have thought that surveys/inspections related to complaints from tenants would be a much better way of ensuring good conditions in the PRS as long as the council use experienced inspectors and have sufficient to cope with complaints. Nevertheless 5 years would have to be a minimum if the scheme is introduced as anything else would look like a money making exercise by the council.
- I don't believe the scheme should be introduced at all.
- I don't think there should be a licence in the first place. But why should there be a time period on it? Why not make it a once and for all licence and why it do on every property. Surely if a landlord has multiple properties they should just have one licence. If you want to make sure they are a good landlord, let them get one licence for all their properties. If they are meeting criteria on one property, they will be doing so on all of them. Also what a biased question, assuming that it should be shorter. Why is there no longer option in the question. Just another example of why the council has already decided that they will implement this.
- I don't think there should be a scheme at all.
- I don't understand what you mean by the scheme will only last 5 years? Wouldn't it be ongoing?? Does the £460 fee sign you up for the full 5 years or will there be further payments required?
- I think the scheme is totally inappropriate on this scale. Whether for 2 years or 5 years the inappropriateness = the same. I believe it will cause huge resentment from tenants and even lead to landlords being effectively blackmailed or maligned and put on "black lists" unjustly by the council. I have seen this happen in the past with larger HMOs. With smaller home licences the potential for mischief are paradoxically worse!
- I would rather not see a scheme at all
- If it has to go ahead I believe the scheme at five years would be ok so long as there is no right to renew on the council behalf.
- It should be for longer
- It should be shorter, so the council can trial the scheme and see if it will be beneficial to the city.
- My fear is that the scheme will be extended as a money making (employment) exercise by Brighton & Hove
- No scheme would be far better.
- No, if anything for that fee it should be for a longer period e.g. 10 years
- Not clear - is this an annual fee or once every 5 years?
- Shouldn't be in place at all. If landlords are not doing their job, tenants should be able to ask the council to act as it does now.
- The scheme is far too expensive
- The scheme should be reviewed after 2 years to see what effect it is having on increasing the cost of living for tenants and keyworkers in the form of higher rents, and on anti-social behaviour and the displacement of certain types of tenants.
- The scheme should not be implemented at all - it will push up rents eventually which is surely

not in the interests of the many voters in Brighton who have to rent

- There is no explanation as to what a scheme lasting five years actually means. Does this mean that any property that is or becomes a rental property in the five year period will be subject to the charge. What happens to a property that becomes a rental property in 4 years and 11 months. Does it mean that each individual licence will last five years and then have to re-applied for or will the scheme simply disappear. Employing people to manage what seems to be described as a scheme lasting just five years will then create Human Resources issues of redeployment or redundancy and even more cost.
- This is simply another revenue generating exercise.
- Why can't it be permanent?
- Yes 0 years as in don't bother to introduce. The council has failed in the last scheme and has only now started to use its powers i.e. Remove rental boards and has still not supplied adequate rubbish and recycling collection facilities in an age when more people recycle you need better storage bins.
- You should not run the scheme at all

Local business

Living in the 12 wards

- No comments
- ❖ No idea x 5
- ❖ No opinion x 26
- ❖ Perhaps 3 years and then monitor?

Living in other areas of the city or outside of the city

- No comments

Other

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- Presumably some tenancies will be shorter - e.g. student lets, so the property may need to be checked more often to make sure it complies with the regulations?

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

5b. Please provide any additional comments to explain your response on the proposed fee structure

Home owner

Living in the 12 wards

- A similar fee structure could and should be applied to Party Houses
- Any fees raised by the scheme needs to be spent on the scheme, this will clearly generate a huge income and therefore a huge spend but on what?
- As I said this is a tenants' tax.
- Fee should cover all costs
- I think the fee should be more than the one proposed. At least £1,000 per year.
- I think the prompted fee should be higher because of the extra work involved. The difference of £120 would not be much money for some landlords who were choosing to ignore/delay the new

licensing rules.

- If landlords aren't proactive they should pay more
- It is already ~challenging to be a ~good, responsible landlady. Concentrate on: ~fining people for rubbish. It works in Singapore. Daily collections. Cut child benefit and offer free buses for all.
- It should be more with the prompted fee being higher and more prohibitive.
- Landlord's need to be called to account. The HMO in my road has a notorious landlord who has a habit of putting in retrospective planning.
- Might this fee put off landlords? We desperately need rented housing in the City and its already in very short supply
- Possibly prompt fee should be higher to discourage non compliance
- Profit is a major driver in private rented sector. The proposed fees seem very reasonable indeed.
- Should be a reduced fee for second-and-subsequent addresses for land-persons (lords, ladies or bodies corporate) who are already holding a licence satisfactorily and have not had problems. One would hope that after a first run, they would "know the ropes" and not need a lot of effort to get the property up to scratch. Similar for renewals if a no-problems licence has run its 5 years and needs reapplying. Also, how about if a single property owner is working through a reputable letting agent or company. £460 is a lot of money on top of everything else if one suddenly finds one has to be away for a period long enough not to want to leave the place empty but not long enough to sell up - for example, if one's elderly parent is given 6-9 months to live and needs you to come and care for them.
- Should be much higher to drive excellent standards. Many HMOs are now moving to Ltd companies so landlords benefit from tax breaks so the claim costs will be passed to tenants is inaccurate. Also rents are dropping due to surplus in the city.
- Suggest the fee should be based on full cost recovery or a percentage (7.5%?) of landlord's estimated gross annual income.
- That works out very cheap over 5 years. Noise/rubbish must cost the council more than that. Furthermore the hourly rates of what you pay you staff to deal with these issues must be in excess of this.
- The prompted fee should be higher to ensure proactive compliance and to ensure full costs of Council Officer actions are covered.
- The prompted fee should be higher, however given this council's lack of desire for clarity and timely consultation in all matters that may be unfair. If the rules are clear and obvious to all then the prompted fee should be higher, I do not want to pay to support lazy owners. Do you really think £140 will cover the work?
- The universities advise students that rental costs are around £6K per academic year in Brighton, a house of four will provide an income of £24K gross, presumably the landlords will pass the cost fee on to the tenants.
- These costs will be passed on to tenants, who will receive no benefit from the licence.
- This fee should not be pushed onto tenants by landlords. Consider adding such language to the documentation
- This is yet another scheme to increase the costs of landlords. It is clear there is a housing crisis and some (not all) landlords that can offer a property to the private rented sector do so. They also do it properly whether through an agency, a management scheme or personally through accreditation. However, they lose their property during this process due to the increased rights that tenants have so it is a gamble. The council has the powers to ensure rogue landlords aren't operating and therefore new licensing schemes are not required or warranted (particularly at that cost).
- This scheme is not needed
- Why are Party Houses not included?
- You need to be charging the landlords more so that they take their responsibilities seriously!!!
- You need to provide police on the beat, and ASB teams who work through the night to tackle

ASB. If your aim is to raise the standard of housing to prevent ASB, you are barking up the wrong tree. It's the alcohol and drugs, party houses and general decline in society inflamed and encouraged by council policies that make people think they 'deserve' everything for nothing that is the root cause.

- ❖ £100 per annum seems a good deal to finance the proposed scheme.
- ❖ Assume it covers the costs, so fair enough.
- ❖ Covers the costs so ok.
- ❖ Does it cover all the costs though?
- ❖ Fair x 9
- ❖ Fair, £100 per year very reasonable.
- ❖ How can the fee really be justified?
- ❖ If it covers the costs, then fine.
- ❖ If it covers the costs, then so be it.
- ❖ Makes sense
- ❖ Quite sure landlords can afford the fee.
- ❖ Seems a fair amount to me.
- ❖ Seems fair
- ❖ Seems fair enough about £100 a year
- ❖ Seems right
- ❖ Seems very fair.
- ❖ Sounds fair.
- ❖ Undecided
- ❖ Unsure

Living in other areas of the city or outside of the city

- A two tier system would be confusing. Don't believe it would have the desired effect.
- Clamp down on dodgy landlords
- This will lead to rent increase

Private rented tenant in Brighton & Hove

Living in the 12 wards

- A higher prompted fee will help ensure compliance from landlords
- A lot of landlords and tenants understand and adhere to tenancy agreements and the law itself and co-exist in well managed, peaceful properties anyway "so a standard fee is adequate" however some tenants and landlords do not understand social responsibility to others and will utilise extra council /police support which justifies and a prompted fee.
- As a private renter in Brighton for over fifteen years now, I have watched and witnessed the demise of rental market situation and have felt bewildered and angry as to why this hasn't been addressed. I feel passionately about the basic human right of shelter and the need for laws to enforce good/affordable housing for all. "If you can't afford to maintain your property then sell it to someone who can!"....that's my t-shirt slogan of the day, or the last 20 yrs. actually!
- But it would have to be ensured that the fee was paid for by the landlord, and not passed on to the tenant / avoided somehow.
- Concerned that the extra cost will be passed onto the tenant via raising the rent.
- Fee too expensive.
- I do think this may end up increasing rents as landlords will not want to pay directly so will charge tenants indirectly.
- I don't think the fees are high enough; Landlords need to understand that owning and letting out properties is about people as well as the bricks and mortar. Most of them could easily afford £1,000 per property.
- I would suggest that the prompted fee be higher to act as a deterrent to avoidance of registering for the scheme - £920 perhaps.

- I'm guessing these fees will just be passed onto the tenants. If that is spread over five years and the council actually enforce the license that won't be too bad. But I can imagine unscrupulous letting agents and landlords abusing this.
- Is this fee for the licence holder? Not clear. It should not be passed onto the tenant/s by the licence holder under any other type of fee.
- It a money-making scheme in which lower paid will have to pay more again.
- It will act as a deterrent to landlords who provide sub standard accommodation.
- Landlord will recoup costs through rent
- More red tape which will get in the way of getting good accommodation, as it will make landlords increase the rent.
- Please be mindful of the propensity of landlords to pass on the cost of any repairs to bring them up to standard / fees to the tenants. The cost for landlords who volunteer for the scheme should be much less to create a clear incentive.
- Promoted fee should be much higher to encourage registration
- Prompted fee should be much higher (£1000+) to encourage upfront disclosure.
- Risk of increased rent from landlords, as well as more red tape. At the end of the day, the tenants will suffer. It shouldn't be adopted, full stop!
- Seems quite steep but I don't have anything to compare it to
- Some landlords have many tenants and properties so these won't be as impacted as a landlord with a small property and few tenants - fee should be bases on size of the property not a flat fee.
- The costs of all this, implementing this licensing scheme, implementing housing changes, can be passed directly onto the tenant. This will lead to rent increases for those that can least afford, making rents and housing in Brighton even more impossible and unaffordable than they already are. If there is a problem, any problem at all, the tenant can simply be evicted.
- The fee seems expensive if the property is already well-managed. The cost of this could be used to put up rents.
- The license cost seems low vs. what private tenants might be charged in rent in the city, and therefore reasonable.
- These fees are appropriate if one off for the 5 years but will need to ensure the fees cover any additional burdens on the council/police/justice system. If for example the licensing system increased eviction orders will the council cover the increased costs for the court?
- We must make sure this fee isn't passed onto the tenants!!
- Yes, very straightforward and encourages landlords to register voluntarily
- ❖ £100 a year seems a good deal to me.
- ❖ £100 pa looks a good deal
- ❖ £100 pa seems very fair to me.
- ❖ Fair x 13
- ❖ It covers the costs.
- ❖ Not sure? How was the figure arrived at really?
- ❖ Reasonable amount to pay - £100 roughly per year
- ❖ Seems a reasonable cost to me.
- ❖ Seems about right
- ❖ Seems about right to me
- ❖ Seems fair £100 pa
- ❖ Seems fair and reasonable to me.

Living in other areas of the city or outside of the city

- Again, I am concerned that this price structure will be borne by private tenants and cause unnecessary increases in rent and property values and pave the way for inflation.
- Am not a landlord/lady. Concern rent may be increased to cover cost
- I worry that the cost will be passed on to tenants.
- Most landlords are rogues. Tenants are well behaved. There are no nuisances in my

neighbourhood.

- Scheme does not work. Ignores safety needs of families. Housing for families should not have lower standards than housing for 'non' families. There should be no distinction. All rental housing should be held to same high standard.
- You are targeting the wrong people. Short-term tenancies (e.g. Airbnb) are the worst as they don't care about being anti-social (parties, drinking), as they are not there to deal with the aftermath. We, on the other hand (long-term tenants who are vetted by serious letting agencies) will pay the price with increased costs that will be passed on to us! Money-making scheme for the Council, which will increase costs to the tenants, who are already paying enough.
- There needs to be some incentive on landlords to make applications proactively, so as to reduce the cost of the scheme overall by reducing the need for the council to investigate potential failures to apply

Social housing tenant in Brighton & Hove

Living in the 12 wards

- No comments
- ❖ About £100 a year looks fair. Perhaps feedback throughout the length of the scheme will give a handle on the actual amount of time BHCC devotes to the project and then charge accordingly?
- ❖ Do not really know how you can arrive at a general figure.
- ❖ Fair
- ❖ If it covers the costs, then fine.
- ❖ Reasonable
- ❖ Seems fair and reasonable.
- ❖ Sounds a good deal.

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- As a managing agent and already having to go through selective licensing in other boroughs it is very time consuming and do not feel that it is monitored in a way that justifies such a large expense. The agent or the landlord provides all the information to the council on a cyclical basis, the council does little work.
- I have no opinion on this.
- ❖ Reasonable
- ❖ Seems reasonable - if it covers all necessary costs.

Living in other areas of the city or outside of the city

- No comments

Landlord of property in Brighton & Hove

Living in the 12 wards

- £460 per flat is a huge amount of money, that you expect us to pay as a lump sum up front on a whim of yours! We just don't have it. We spend the rents as they come in on maintenance, repairs and upgrades, our budget is fully planned several years in advance. We don't do this job because we get to swan around in a Rolls Royce and go on holiday every month. We outsource our skills to other landlords and friends as builders, plumbers, electricians etc. to keep the wages etc. coming in in free time to ensure that the maximum amount of money goes back into our housing stock! To fork out £10k to you next year as a lump sum is a building that won't get its scheduled maintenance done, or three kitchens that won't get renewed.
- All the conditions in the proposal for selective licensing are all the things that good landlords (and letting agents) should be doing anyway and is enforceable by law. I do not see why

landlords need to fork out an additional £460 to prove this.

- As a landlord I pay my taxes and spend money maintaining my properties. I don't need additional costs.
- As indicated previously, I anticipate that the local authority holds powers in respect of the majority of identified matters. Any party causing the requirement for intervention should be met with meeting the costs of that intervention, thereby negating the requirement for the scheme.
- As long as the fee goes back into the housing budget and less deals are done behind closed doors, I would be happy with this
- I agree with the principle of the scheme as I think it will hopefully reduce the number of people having to cope with irresponsible landlords. However I think the fee seems rather expensive - e.g. if you have 24m2 studio flat compared to a much larger two bed flat. Also it would be good if the landlord also benefitted from the scheme. From what I have read I understand that the landlord will receive support with ASB but that seems about it.
- I do not agree with a licence scheme or the proposed fee structure
- I don't agree with a standard fee for all properties. Many properties are in very good condition and managed by agents who are being paid to maintain property standards
- I feel this is a money spinner for a council that can't raise the council tax.
- I simply think it is a waste of time and money. Focus on all of the people, particularly the growing number of women on the streets at the moment...this is a waste of time. Focus on something more important. Landlords generally won't be able to afford this and it will come back onto the tenants, and the council who pay housing benefits etc.
- I think is obvious – The whole scheme has been poorly thought out, the council should organise a meeting with landlords as a whole
- If a license is valid for 5 years, why not only charge a simple amount, like £50 only?
- If the scheme is introduced, I think there should be a reduction for landlords who are already providing good quality rental properties, as suggested below.
- If there is a fee, then those who pay it promptly should have a discount. What about landlords who have multiple properties as well. Are you going to sting them for all the fees together, thereby messing up any cash flows that they have??
- If this consultation is anything like the parking one it won't matter what our input is anyway
- In a typical oversight, in the Selective licensing scheme consultation information (PDF 68KB), you haven't even said whether the licence fee is for the proposed term of the scheme or is an annual fee!! It will simply have the effect of increasing rental prices in the private rental sector above the level of the proposed fee, which is detrimental to tenants - it will be an additional fee that the tenants end up paying.
- Is this a one-off or annual fee. Excessive if annual.
- It seems fair that those who do not co-operate with the scheme meet the higher costs involved as long as the scheme is well publicised first.
- It should be cheaper if you are already meeting these conditions/ standards by letting through the council or a reputable letting agent. We will pass these fees onto our tenants - how is that helpful to them?
- It's just an on cost for landlords which will just feed through to increase rents.
- Needs more teeth - at present structure will just end up as resentment and non compliance,
- Not applicable as the scheme is not justified.
- Only have to increase our proposed letting fees to cover costs. I don't intend to absorb the fees as a landlord.
- You are posing a question in a manner which would give acceptance to your proposed scheme if it was answered as you require. By all means inspect properties at your will but do not charge for it. It should be noted that should the council implement any form of charge this will be passed on to the tenant in the form of a rent increase. At present my own rents are well below the norm for Brighton. My properties are well maintained one bedroom flats and my tenants,

who are all recipients of some type of benefit, are happy renting from me and enjoy living in the properties. Any increases in rent may make the properties unaffordable to them. I am happy to keep my rents low and rent to recipients of benefits but not at the cost of paying out extra charges to the council.

- Should not be a fee.
- Since landlords will pass all the costs on to their tenants through increased rents, it will tend to further penalise the tenants of less scrupulous landlords.
- Some fee is justified as long as the council is pro-active.
- The £460 is a lot of money to find at one time unless there can be arrangements to pay it in instalments. There does not seem to be a big enough disincentive between the standard fee and the prompted fee to encourage landlords to register at the right time.
- The £600 price will be a rip-off for the Council if you advertise the scheme as badly as you did this consultation.
- The fee is very high for a three tenant sharing house compared to an HMO with 10-12 people, which I believe is £790. The income for the landlord on the larger house is a great deal more and, I suspect, your time and involvement would be a great deal more on a larger property. Again it should be per year rather than a set 5yr block as the property may only come onto the rental market in the last year of the scheme.
- The fees are much higher than some other local authorities and BHCC provides no transparency or auditable figures to demonstrate that this is not another revenue raising initiative being instituted by stealth. BHCC's profligate spending on slum HMO accommodation should cease before seeking to extract additional monies from landlords who offer good quality accommodation.
- There is no ground in law for such a fee structure.
- There should be a reduced fee for landlords also living in Brighton & Hove and/or they belong to a landlord/agent scheme
- This seems expensive, especially for 'accidental landlords' who do not make a profit on the property they rent out.
- Utterly outrageous that you can attempt to justify a fee of this kind for a couple of visits to a property which would last no more than a couple of hours. Whilst ticking boxes in a pre-printed report
- Way too expensive.
- What is your plan for letting everyone know if and when this is being introduced so that people have a fair opportunity to register proactively?
- ❖ No comment

Living in other areas of the city or outside of the city

- A fee of £0 would be better here is an example of where £460 could be spent every pound spent on licence fees and paperwork is a pound lost to rental and house improvements. Landlords are struggling under new tax regimes as it is £450 - buys a full structural survey for a house from a competent RICS Surveyor with recommendations and proper comments to improve the property - I now have a decent HMO inspector however the last 3 varied from average to dangerously incompetent In my opinion any inspections should be carried out by an RICS approved building Surveyor £400 - £600 buys a fully installed mains powered battery back up smoke alarm system money better spent How a fee so high can be proposed by the council scares me. If I can have a full structural survey by someone whom is actually very experienced as an RICS building Surveyor with an individual property report produced including comments and recommendations for less as an individual report shows how bad value this is if I was having 100 reports carried out I could get this down to £250 the council is making a profit that they are legally not allowed to do (please look at case against Liverpool council) and if as a council you argue a profit is not being made that is even more worrying as it shows extreme inefficiency and wasting of public funds as a council.

- Additional costs to landlords will do nothing but push up already ludicrously high rents for tenants.
- Any fee should be discounted for; a) prompt payment and early payment; b) membership of SLA/RLA etc.; c) single fee for units at single address; d) use of independent surveyors for inspections
- As long as reminders are sent to landlords when licences need to be renewed, I would agree with the increase for the prompted fee
- I don't agree with the scheme as I don't think it will achieve the aims that the council has stated. It does appear to look more like a money making scheme. A scheme inspections and fines for bad landlords would be more useful with heavy fines for unsafe or insanitary conditions.
- More daylight robbery!!!!!!!!!!!!!!
- Council should be chasing up rogue landlords, not good ones.
- Do you need to ask
- Far too expensive.
- Fee seems fair
- Fine the people behaving antisocially you are totally focusing in on the wrong area.
- Having read the conditions of the licence it would appear that I and most respected landlords are carrying out these obligations at present as they are already enshrined in legislation. The licence offers nothing that cannot be achieved through best practice when it comes to enforcement.
- I believe the fee structure to be excessive and beyond the costs of the administration of the scheme. The additional costs to landlords are likely to put upward pressure on rental levels.
- I disagree with any fee structure based on licensing all landlords whether in certain ward or City-wide. Good landlords should not have to pay to deal with the rogues - rogues should pay or all citizens. 77% of landlords (1.8 million households) nationwide say they are reliant on rental income to fund their retirement and some 95% of landlords own only one property. A proper impact assessment should consider that alongside the interests of tenants of rogue landlords and the interests of the Council. Also the impact on the rental market and whether good landlords will in time pass on the PST should be factored in.
- I don't know where they got the figures for this from. £460 is a total joke. A driving licence costs £34 or £43 if you apply by post. All you are doing with a licence is filing it. You're not implementing the law that's already in place. So £460 for someone to input some details into a computer is a total joke. It's just a money making scam for the council. Also where is the provision to pay in instalments? This was mentioned in a Southern Landlords Meeting to a council representative and they said that 'no one else does it, so we're not planning on doing so.' That's just appalling. There is no excuse why this couldn't be paid in instalments? I have 12 properties and do not have £5520 just sitting around in a bank, so won't be able to afford to pay this in one go. What is the council doing to help landlords out with this? I very much doubt that they are doing anything to help landlords.
- I think the fee is too high. It would add to landlords costs and make renting even more expensive as the cost would be passed on to tenants
- Is the £460 an annual payment? If so I do not agree - it is too much. If it is for the 5 years then it is reasonable. I am not sure I agree with the prompted fee. I think the fee should be a standard fee and then a stepped penalty system for landlords who maybe don't then meet the obligations within 3 months, 6 months, 9 months, 1 year etc.
- It appears to attack all landlords even though some of us are responsible
- It means I pay the same for my studio apartment as someone with a four bed house. The costs will have to be passed on to tenants and it means tenants in smaller properties will be hit disproportionately.
- Its much too expensive
- It's quite high if annual so needs exploring - landlords will pass onto tenants and rents will

increase

- Landlords are already experiencing higher costs in the form of higher stamp duty, a restriction in mortgage interest relief, and the abolition of the wear and tear allowance for furnished properties. The fees are going to make it even more expensive to be a landlord and will deter landlords from entering the market, leading to even higher rents for those that can least afford it. This would happen even without landlords intentionally increasing their rents, the sheer demand and restriction of supply will push rents up. At the time of writing the average (median) rent for a 1 bed flat in the city is nearly £950 per month (as advertised on Rightmove), this will push prices even higher. There should also be a reduction for multiple properties owned by the same landlord as the fit and proper person test only needs to be carried out once!
- Landlords feel that this is just another tax on them.
- Licencing landlords who manage their own property portfolio would seem to be a sensible approach as there is little or no oversight on their culpability. For occasional landlords with small portfolios who make use of and pay for the services of a reputable Letting Agent the Council could discharge its aims and responsibilities onto the agent who already have staff knowledgeable in the legal requirements that a landlord must comply with and therefore reduce the burden of cost by accepting that the agent acts as a reputable out source option..
- Money making again
- Most landlords know it is a money making and job retaining exercise for the council which is very short of money. Concentrate on the basics. Collect your unpaid £ 7.5 million council tax and business rates first.
- Not clear what it's for. Is it to cover cost of the scheme in which case ok, or will it generate income, in which case it should be lower. I'm assuming at these levels it is not intended to be a bar to entry as a landlord.
- I don't believe the scheme should be introduced at all.
- Seems very expensive and am suspicious this is just revenue earning by the back door.
- Should depend on the size of the property.
- So long as there is good evidence that the scheme is achieving its aims; the flip side is that it becomes another council tax aimed at landlords and the impact for residents is not felt.
- The costs to and obligations of private landlords are ever-increasing (e.g. abolishment of tax relief on mortgage interest - which is not a fair tax, right-to-rent checks etc.). I have always ensured that my rental properties are immaculately maintained, safe, and that any faults are rectified immediately - I am proud of being a fair and helpful landlord and would be very happy to be licensed - but I am not happy to have to pay a fee to do so. I have never passed the costs of letting a property on to the tenants, but there is no doubt that the continuing rise in costs to landlords are going to start placing an upwards pressure on rental prices if this continues.
- The fee of £460 would mean an instant bill of £7360.00, money which would be better spent on our properties. The 16 flats are in three buildings and would require very little effort on behalf of the council. There should be a discount available. Members or groups such as the SLA and NLA should also be entitled to discounts, as in other councils. The chances of the council viewing all 27,000 homes on top of the proposed additional licensing properties are zero. As such there should be a discount for properties not viewed
- The fees are extortionate, will cause "zero goodwill. The will do nothing to increase housing supply" only reduce it! They fees skimmed off the already small profit margins will:- a) lead to overwhelming pressures to increase rents; b) improvement funds being eaten into and new housing provision plans postponed indefinitely
- The prompted fee would make landlords more likely to make applications, in order to improve conditions
- The scheme is far too expensive
- There will be a public backlash to these fees, the councillors need to be clear about the benefits.
- This is probably an estimation of the average work required for each application. This does a

disadvantage of applications from landlords that fully comply with all the requirements, which surely takes less time to deal with. I would introduce a reduced fees for those applications that were made right from the beginning.

- This is simply an excuse to raise revenues and penalise landlords
- This is yet another cost to be heaped on landlords who are already heavily taxed. It will prompt landlords, such as me, who very infrequently put up rent to long-term tenants to do so. And I will.
- This scheme will cause some landlords to drop out of the rental market causing rents to rise. It may slightly improve the quality of rental properties, but the cost will be passed on to tenants. A £100 per year hike in the rents will be quite an increase, particularly for tenants in lower value properties.
- We have one rented flat on which, after tax and mortgage, we receive about £100 a month in profit and maintenance costs - this suggested fee is too high for small landlords
- Why so much? Surely if an inspection is OK it should be cheaper.
- You just want to make money, so you will make excuses to elongate the process so that you can charge the higher fee.

Local business

Living in the 12 wards

- No comments
- ❖ £100 a year? Good value, I suggest, if the scheme works out.
- ❖ £100 per year is not onerous.
- ❖ £100 roughly a year seems fair enough to me.
- ❖ Fair x 4
- ❖ It has to be paid for but £100 per annum sounds very reasonable to me.
- ❖ Not excessive
- ❖ Not sure
- ❖ Not too much is it really?
- ❖ Reasonable prices
- ❖ Seems a fair amount to charge. Is it enough?
- ❖ Seems fair to me.
- ❖ Seems fair.
- ❖ Seems reasonable. Landlords do have high profits.
- ❖ Seems very fair to me
- ❖ Sounds a reasonable fee.
- ❖ Sounds fair x 3
- ❖ Yes, sounds fair enough to me

Living in other areas of the city or outside of the city

- The prompted fee could be higher. With only £120 difference, landlords may choose to try and stall.

Other

Living in the 12 wards

- I think this needs to be more. As a community we have been regularly told that the council has had insufficient resources to enforce breaches of the HMO license. Landlords in this area make a considerable profit from renting out properties and their tenants are often difficult and anti-social requiring intervention. I would strongly support a higher fee.

Living in other areas of the city or outside of the city

- If you are making money from property, you have responsibilities for it to be safe and in good condition
- I'm not familiar enough with the fee structure that is in place elsewhere to make a detailed

comment - because presumably the council will be/ has taken this into account when establishing the proposed fee structure?

- The prompted fee should be at least double the normal fee to discourage landlords from ignoring
- The prompted fee should be based on actual cost to the council in making their enquiries and a fine for the person(s) failing to apply for the required licence.

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

5d. Please provide any additional comments to explain your response to the proposed reduction in fee

Home owner

Living in the 12 wards

- Again, this adds positive incentives for those who are good ethical landlords.
- All good landlords should not be penalised by this new system. The whole system wouldn't be needed in the first place if every landlord met the national standards of good practice.
- All landlords should be accredited and should be taking care of their properties so no fee reduction for any landlord.
- At this point isn't there duplication in the system?!
- Brighton and Hove City Council is flooded with the private rented sector, student housing and language students. It is probably about time, they had a partnership with the National Landlords Association or the Residential Landlords Association or both to promote good practice. You might even find that there are more landlords than you are aware of that are accredited landlords in Brighton and Hove.
- But this would work better if the fee was higher.
- Buy to rent landlords tend to own a portfolio of properties which does not confirm compliance with standards
- Control needs to be local and the fee should reflect the work involved. Are you saying this is a money making exercise where a portion of the fee is profit that you are prepared to decrease for local estate agent owners? No. That is not on. I want to be able to hold the council to account not give you the ability to pass the buck to other organisations with potentially shady practices and in my experience estate agent owners are some of the worst landlords in the town.
- Generally tenants of private landlords tend not to complain as this causes conflict and rent goes up or they are given notice - so they put up with sub standard conditions- we are not talking about council tenants
- Good landlords ought to receive some recognition for maintaining good standards.
- If this is just a tick boxing exercise I can imagine many would met the criteria without actually demonstrating "good practice" standards
- Many of the accreditation schemes are not worth the paper they are written on
- Most landlords want to do the right thing. You have to give some carrot and not just stick. Landlords have a lot to deal with as it is without more punishing legislation.
- No - All Landlords need to be treated the same and the same level of accountability needs to be applied.
- No reduction - otherwise all sorts of illicit practices will be conjured up to avoid this.
- Possibly this might work but might be used as a means to avoid fees
- Scheme not required
- The cost of the scheme will be the same, regardless

- The council should know that any excuse will be made not to comply with regulations that will protect tenants from the usual exploitation.
- The scheme should exist to reward good landlords, not penalise them. Suggest £200 for good landlords.
- There should be 'no fee' for good landlords
- This seems fair - ultimately good landlords will pay less and poor land lords will be penalised - encouraging them to look after the property better
- Why are Party Houses not included?
- Would this also apply to Party Houses?
- Yes - there should be an incentive to encourage good practice as in reality sadly money talks
- Yes we want good professional landlords for the benefit of tenants and The community
- Yes. A performance related scheme.
- You might consider a reduction for a landlord if you inspected all their current properties and all complied with standards and were in good habitable condition
- ❖ A clever aspect to the proposed scheme that will work.
- ❖ A good aspect of the proposal. Will get landlords "on side".
- ❖ A good idea to do this.
- ❖ A good incentive for the landlords to take part in the proposed scheme.
- ❖ A very good idea
- ❖ Again, a good move by the council to encourage more participation.
- ❖ Again, an excellent proposal x 2
- ❖ All for encouraging people to take part.
- ❖ Always a good idea to encourage and give incentives - they work!
- ❖ Clever aspect of the proposed scheme, bound to result in more uptake from landlords.
- ❖ Clever idea
- ❖ Clever idea. Will boost participation.
- ❖ Clever move that will work.
- ❖ Encouragement such as that would be a good idea
- ❖ Excellent idea
- ❖ Good idea x 8
- ❖ Good idea to get as many to join in the scheme as possible.
- ❖ Good idea, will work.
- ❖ Good idea. Will increase participation in the scheme.
- ❖ Good incentive x 2
- ❖ Helpful part of the scheme
- ❖ If it adds to the numbers taking part, then clearly a good idea.
- ❖ It is a good idea.
- ❖ It will help them "sign up"
- ❖ Landlords will certainly benefit from the proposed scheme too, so to incentivise and use national standards is a good idea.
- ❖ Like this one, will encourage participation.
- ❖ Must encourage participation
- ❖ No, all treated in the same fashion
- ❖ Smart idea x 2
- ❖ Smart idea, support
- ❖ Smart move, good idea
- ❖ Smart plan. Will encourage participation.
- ❖ Support
- ❖ Use all ways to encourage participation.
- ❖ Will certainly encourage landlord participation, so a good idea.
- ❖ Will encourage

- ❖ Will encourage landlord participation.
- ❖ Will encourage landlords to be involved and to carry out their responsibilities.
- ❖ Will encourage more participation and that is a good thing.
- ❖ Will help
- ❖ Will help participation
- ❖ Will it make any difference? Perhaps it will, so I tend to agree.
- ❖ Will obviously encourage more participation.
- ❖ Yes, another excellent aspect of the proposed scheme.
- ❖ Yes, encourage them
- ❖ Yes, encourage them to participate
- ❖ Yes, encouragement like this is a good idea.
- ❖ Yes, get them "on-side"
- ❖ Yes, it may get more landlords to "sign up"
- ❖ Yes, it would encourage more landlords to take part in the scheme.
- ❖ Yes, use every encouragement that is available.
- ❖ Yes, will encourage more participation.
- ❖ Yes, will make more join in.
- ❖ Yes, worth pursuing

Living in other areas of the city or outside of the city

- An accredited landlord is not necessarily a good landlord.
- Good landlords should not be penalised because of the poor behaviour of bad landlords
- I don't know enough about these schemes.
- Incentives for managing and maintaining a rental house to a high standard would be beneficial to the renter
- Maybe, but I would be against relaxing the inspection requirements
- Reward responsible landlords
- Yes this would be an incentive that would help both the landlord and tenant

Private rented tenant in Brighton & Hove

Living in the 12 wards

-I'd go one step further and waiver the fee to landlords who are willing to provide long term housing to people with chronic health conditions in receipt of housing benefit.
- A house is a house no matter how many people live in it or where they come from.
- A reduction for accreditation will prompt landlords to improve / maintain standards
- Depends on reduction amount, what the scheme entails etc. as there still may be loop holes to provide unsafe properties.
- It shouldn't be adopted, full stop!!
- Even if landlords are members of accredited schemes somehow they manage to offer poor standards
- Flat rate for all
- Good landlords should be rewarded.
- I don't believe landlord and agent groups have tenants best interests at heart.
- I think having the scheme across all types of tenancy could in itself be a kind of accreditation as it already sets out standards for good practice. I think it could be marketed to all landlords or agents that paying for the licence is in itself supportive because it provides conditions of good practice.
- I would be worried about landlords with many properties (as my landlord has) selling properties as a direct result of the introduction of the scheme causing more homelessness - an initial introductory reduction in fee for existing landlords may help prevent this.
- If the landlord is already meeting a national standard, why should they have to pay again?
- If they are already accredited it seems daft they should have to double up, but if the fee is set by

the council as the cost of implementing the licence then maybe there shouldn't be a reduction as the council can't afford to absorb the difference

- It is a money making scheme in which lower paid will have to pay more again. So stop spending money on wind farms, and start looking after the people of Brighton and Hove.
- Most people I know in private rented accommodation in Brighton have problems with agents as well as landlords.
- My landlord employs a lettings and managing agent to manage my flat, so the conditions in the proposed licensing scheme are already met.
- My previous letting agent was accredited however the condition of the property was shocking and it wasn't until the landlord came to see the property themselves (they lived abroad) that any issues were brought to light or resolved.
- Only if the basic fee was higher than shown above.
- Perhaps, although I feel there should be measures to remove landlords from this list if they are found to violate the terms of the license.
- Private landlords while we have to have them should be rewarded for good practice. Unfortunately in society there has to be something in it financially for people to act in a morally just way. If there is a financial incentive landlords more likely to act decently.
- There are some reliable landlords out there whose responsible attitude to tenants should be recognised.
- These landlords / tenants take their ~role and jobs seriously and already provide well managed homes they go that extra bit more for tenants and their own properties "a reduced fee would reflect and reward that good practice. Some landlords do take their role seriously and are 'fit and proper' landlords+ met national standards of good practice. Unfortunately, there are always landlords that don't care about the conditions their tenants live in+ how that impacts in their personnel lives. A higher fee/charge would be valid.
- This should not apply because it would be tantamount to self regulation which would be pointless
- Yes - this process should be targeted at landlords who fail to maintain a decent standard of accommodation not punish those who do maintain their accommodation.
- Yes as some landlords are very good and do look after property and tenants not fair they should suffer because of others.
- Yes, but only if annually appraised like other professional bodies
- ❖ Again, a clever part of the scheme. By all means, encourage participation by landlords.
- ❖ All for encouraging landlords to participate.
- ❖ All incentives like this will help
- ❖ Always a good idea to incentivise participation and feel sure that this will help
- ❖ Another excellent proposal. Can only help.
- ❖ Clever idea x 3
- ❖ Clever idea. Let's hope it helps.
- ❖ Encourage as much as possible to join scheme.
- ❖ Encouragement is a good idea x 2
- ❖ Encouragement often better than compulsion, so this is a good idea.
- ❖ Encouragement will help
- ❖ Encouragements like this will help
- ❖ Every encouragement should be used.
- ❖ Excellent aspect of the proposal.
- ❖ Gives status to the organisation who will encourage their members to take part - very smart.
- ❖ Good idea x 8
- ❖ Good idea to encourage in this way.
- ❖ Good idea to encourage landlords in this way.
- ❖ Good idea. Will encourage participation.

- ❖ Good idea. Let's get everyone "onside"
- ❖ Good incentive, support
- ❖ Helpful idea
- ❖ I am all for encouraging participation and feel sure that this will do that.
- ❖ If it makes more landlords sign up then yes, go for it.
- ❖ Incentives do work
- ❖ Incentives usually work.
- ❖ Must help
- ❖ Must help, will incentivise landlords.
- ❖ Smart idea
- ❖ Support
- ❖ Will encourage landlord participation.
- ❖ Will encourage more participation.
- ❖ Will encourage more take-up.
- ❖ Will encourage participation x 3
- ❖ Will encourage participation by landlords into the scheme and that is a good thing.
- ❖ Will encourage participation by landlords.
- ❖ Will encourage participation so it is a good thing.
- ❖ Will encourage participation, so a good thing.
- ❖ Yes, a good idea x 3
- ❖ Yes, again BHCC at their best and smartest: incentive is a good idea.
- ❖ Yes, encourage participating in the scheme by landlords.
- ❖ Yes, encourage them to participate in the scheme.
- ❖ Yes, encouragement will help
- ❖ Yes, encouragements like this one will help
- ❖ Yes, give all the encouragement you can to get people to support the scheme.
- ❖ Yes, good idea. The more status that landlords have, the better.
- ❖ Yes, keen to support idea like this.
- ❖ Yes, let's encourage them.
- ❖ Yes, let's pull out the stops to encourage landlords to join the scheme.
- ❖ Yes, use incentives to boost the scheme
- ❖ Yes, will encourage participation and living up to the new higher standards.

Living in other areas of the city or outside of the city

- I do like the idea of rewarding by carrot in principle as opposed to correcting or punishing by the sword, however, consideration should be given to what percent of reduction in each case (if it varies) or set a one-off discount which cannot be varied and also considering defining what amounts to "Good Practice" ahead of time to save argument later on.
- I think serious landlords (e.g. those who go through accredited agencies who do all the groundwork) should not be charged anything, as they are already paying for this service to the agencies in question. Otherwise, this will simply result in increased rent, which will penalise the tenants.
- I would doubt the reliability of such accreditation
- Some landlords must be fair. They should be rewarded. I am afraid to ask for repairs anymore as the landlord wants us to move. I am severely disabled and may not have long left. I cannot move. Better to live in a damaged house than be homeless.
- Sounds sensible
- You could also add an additional discount to support more secure, longer tenancies. Such as a percentage reduction according to the number of years there has been the same tenants.

Social housing tenant in Brighton & Hove

Living in the 12 wards

- Good practice that already exists should be rewarded.
- ❖ A very good and clever aspect to the scheme. Quite sure encouragement and incentives are the route to go down.
- ❖ Agree with
- ❖ Can only help
- ❖ Good idea x 4
- ❖ Good idea, will bring more "on board"
- ❖ Incentive that will help the scheme
- ❖ Must help, it will encourage participation.
- ❖ Smart idea x 2
- ❖ Use all the encouragements and incentives necessary to promote and encourage participation in the scheme.
- ❖ Will encourage more participation
- ❖ Worthwhile idea.
- ❖ Yes because that will act as an encouragement.
- ❖ Yes because that will encourage more to come forward and take part.
- ❖ Yes encourage them to participate
- ❖ Yes, a constructive idea
- ❖ Yes, as it encourages more participation.
- ❖ Yes, good idea x 2
- ❖ Yes, it will encourage participation
- ❖ Yes, will get them to sign up

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- We manage a portfolio for a large investment landlord who is conscientious and ensures their properties are maintained to a very high standard. To not give a discount or reward these type of landlords defeats the purpose of the licensing.
- ❖ Always good to offer incentives and encouragements and this aspect of the proposal does just that.
- ❖ Like that!

Living in other areas of the city or outside of the city

- No comments

Landlord of property in Brighton & Hove

Living in the 12 wards

- Accredited agents ought to be trusted by the Council to do some of the work, and should reduce the amount of work needed by the Council to licence each property.
- Again the question is posed in such a manner that answer would indicate an acceptance of the proposed selective scheme which I am against. Licensing was introduced by the government to aid councils which had problems with anti social behaviour and/or poorly run or dilapidated housing stock. None of this applies to Brighton and Hove
- All good landlords should be exempt.
- As a landlord of only one property, why should I bother to become accredited.
- If the scheme is introduced, I think there should be a reduction for landlords who are already providing good quality rental properties. A blanket fee takes no account of the fact that some landlords already provide good quality rental properties.
- BHCC fee structure lacks transparency and value for money. BHCC's own profligate spending on slum accommodation should be addressed before imposing fees and decent landlords.

- Brilliant idea. Every year I am hoping (secretly!) that someone (other than many of my tenants) will say 'thank you for being such a brilliant/understanding/careful landlord. Some recognition of meeting standards of good or even excellent practice is a good incentive
- But if such a thing is possible, what is this scheme achieving? Why don't you just partner up with an existing accreditation scheme and ask landlords to register with that?
- Every landlord should be accredited with the national landlords Association, thereby cutting out the problems of amateur landlords.
- Good landlords should be rewarded
- I am a caring landlady and would not rent out a property that I wouldn't live in myself. The HMO Officer who came to inspect my property said as much and that the scheme is not really to catch out people like me. I could easily box out the property to have 5 bedrooms instead of the 3 I have but I won't do that. I understand the need and indeed welcome an inspection to ensure the safety of my tenants but would welcome a little give and take and a lower category of checked and caring landlords.
- I am a good landlord and adhere to every legislation already and the block is well manage so do not see the need for the scheme
- I am the landlord and let the property through an agent but carry out any maintenance myself.
- I currently have a letting agent who has full management responsibility for the property. So I am already paying a considerable amount of money for someone to ensure that the tenant's rights/needs are being met.
- I don't agree with implementing the scheme, but if it is then there should be no fee to landlords who already pay out to managing agents.
- I firstly don't agree with the scheme and the fee. But if it does come into place then obviously dutiful landlords that accredit themselves through national schemes should obviously be encouraged through reduction in fee.
- I think there should be ways of either landlords being accredited or through their agents. Personally I insist that any agent I use is registered with someone such as ALARA. It should be I think potentially illegal for an agent not to be registered under such as scheme.
- If a scheme is introduced, then yes there should be a reduction in the fee for landlords who can meet national standards of good practice.
- If it is less cost for the council to administrate, the costs passed on to landlords and their tenants should be reduced.
- If landlords have proven tracks records then yes they should have a benefit
- If the scheme goes ahead I think you should give an enormous reduction to professional accredited landlords who can prove by inspection that their flats are up to scratch and maintained!! Ultimately the only people who will get hurt by this scheme are the tenants! Rents will go up, decent tenants will pay through the nose. Rubbish landlords will still escape punishment as you will be too busy chasing up your own tails. Rubbish tenants will still cut and run at the first sign of trouble and just move on. But our tenants, the cleaners, the hotel staff, waitresses, housekeepers, delivery drivers, etc. will be the ones who end up paying - Not fair!
- If using an agent most the National standard should be met
- If you look at the websites of the various Brighton companies they all make good practice promises. Then look at review sites like All Agents or better still the ones students use. The promises are often unfulfilled, so to validate accreditation a Landlords/agents track record needs looking at. People do leave good feedback if they are happy it is not just those with an axe to grind.
- I'm happy to be accredited as a good landlord, but feel you are trying to capture the rest of the landlords who don't fall into the HMO category to get something/anything out of them too. I understand the tenants' welfare is of extreme importance ...please note there are many, many good kind landlords out there who simply cannot afford this.
- It should be cheaper if you are already meeting these conditions/ standards by letting through

the council or a reputable letting agent. Why penalise the good landlords - you should charge those landlords who do not provide good housing. This scheme could be seen as a carrot to reward good housing conditions - rather than yet another stick to beat landlords with.

- Much of this seems to be about the landlord assuming further responsibilities for the behaviours of the tenant. Whether the landlord has paid a fee to be part of a scheme or not will have little or no effect on this. As to questions of property condition, tenants should be sufficiently informed and aware to know the requirements for satisfactory let.
- No relevance to the standard of an individual property whatsoever.
- Only if the Council charge me nothing.
- Or who are using a managing agent rather than doing it themselves
- As a professional landlord in contact with many other landlords who both uses both agencies and direct I am aware of compliance as required i.e. gas safety and therefore do not see how duplicating compliance improves the overall standard of privately rented accommodation.
- Should be no charges
- The premise of this question is invalid..
- The RLA stands ready to help. An accreditation scheme can replace licencing.
- This would encourage good conscientious landlords
- Who would provide the "scheme" and to agree to answer this question would mean endorsing the fee in the first place
- Yes -? It should be £0 - and it should be allowed for Letting agents to do this on behalf of owners.
- Yes and possible a reduction on subsequent licence applications if there are no recorded complaints about that landlord and their property.
- You could also consider reducing the renewal fee each time if there has been no complaints or issues with a particular landlord.
- You should only target bad landlords and not everyone.....go after the bad guys; you know who they are.....
- ❖ Great idea

Living in other areas of the city or outside of the city

- A good landlord should not have to pay anything
- Accreditation is difficult as there are no really solid schemes, but there should be a discount for landlords that belong to the Southern landlords Association.
- As stated previously I do not believe the scheme will really benefit either tenants or landlords and therefore I am opposed to it, but if it does go ahead there should at least be a discount for accredited landlords. I am in the process of becoming accredited myself.
- At present Brighton and Hove go after people who comply with licensing and in my experience do nothing for them so yes I agree but a reduction to £0 would be acceptable
- But will that be an additional cost!
- Good landlord/agents should be helped if this poor proposed scheme went ahead
- Good landlords are already paying to be a member of The Residential Landlord Association or similar and all up to date information on landlord obligations and changes to the Law etc. are emailed regularly, with regular reminders. I would resent having to pay a fee to the council to show I'm a good landlord.
- I am a member of the RLA and accredited associate member of the Institute of Residential Property Managers. If such a scheme is introduced that should be recognised with a substantial reduction in fees.
- I would prefer a local licensing scheme (without fee!) as I am not confident that such schemes are good indicators of how landlords behave in reality, and maintain their actual properties.
- I'd rather you imposed an increase (possibly escalating) for those who don't. Realise this strays into penalty, but if you are trying to change behaviours, those landlords you are worried about will not be concerned about discounts on a fee that's not very high in the first place. To be effective a system of automatic and escalating penalties would be more effective (works for

HMRC)

- If a landlord is accredited under a landlord/agent scheme, and proven to be a good landlord, then why should they need a licence as well?
- If this scheme goes ahead (and I hope wiser head will prevail) then they should be reduced by a minimum of 50% for members of respectable landlords associations “, such as S.Landlords, the RLA and the NLA, other local authorities are generous and encouraging to their landlords in the private rental sector. But Brighton & Hove only pay lip-service to cooperation” and make risible reductions for multiple properties and none for NLA members
- If you are letting a house through an agency you have already paid an introduction and management fee every month and some of the requirements are their responsibility and what you are paying them for. I think the fee associated with letting via an agent should therefore recognise that fact and be discounted.
- In fact I think that where a landlord uses the services of a accredited agent scheme, the licencing and accreditation of the agent will provide a more consistent degree of service at a more beneficial cost. As the licence fee should only equate to the cost of administering the scheme this will help reduce the financial burden and risk that such a scheme will create for the council, unless of course the financial aim is a mere smoke screen to raise additional revenue.
- It would be unfair to treat landlords with properties of different standards the same. Some landlords may have acceptable standards and others may not- it would be appropriate to distinguish between them, in order to persuade more landlords to improve their standards.
- It's not clear what this means.
- Landlord and especially agent management schemes are only as good as those who manage the scheme and again one has to rely on good agents. Some agents struggle to find good quality employees who actually know what they are doing. National standards of good practice can only be maintained by a system of survey/inspections based on complaints from tenants and carried out by the council or there appointed representatives. We employ our own contractors to ensure our properties are maintained correctly and meet national standards.
- Membership of the National Landlords Association should attract a reduced fee
- More bureaucracy - no thanks!
- No. Being a member of an organisation is no guarantee of compliance or “reasonableness”. Some people have 2 faces.
- That would be an incentive to be accredited
- The fee should be a maximum of £100 for accredited landlords. Only the good landlords will register. Do you honestly think rogue landlords will register. A lot of HMOs are not registered in Brighton & Hove especially landlords who live abroad. They do not want council interference.
- The reduction should be 100% for all landlords - it is simply a tax on business to assist employment levels in the public sector
- The scheme is far too expensive
- There could be an accredited landlord scheme on a voluntary basis where landlords could pay to be checked and go on the list. I don't agree with the compulsory nature of the scheme.
- This is a good idea - a landlord who is responsible using a reputable managing agent should not be treated the same as the other types!
- This is probably an estimation of the average work required for each application. This does on disadvantage of applications from landlords that fully comply with all the requirements, which surely takes less time to deal with. I would introduce a reduced fees for those applications that were made right from the begin.
- This will create scams for letting agents to avoid the fee - we don't use an agent and our tenants agree they get a much better service as a result
- This would provide an incentive for compliance, and would be fair
- We use a good agent and that is essential for us to know everything is done properly.
- Would encourage accreditation which wouldn't hurt

- Yes there should be a reduction as accredited landlords would already be professional
- Yes, this shows a commitment to higher standards and should be recognised. It is the rogue operators we need to target not penalise all by heavy handed blanket methods.
- Yet another scheme? Really? The discount should apply to Landlord Association members as well as they are already making efforts to improve the quality of there properties and keep on top of legislation. RICS regulated landlords/ agents should also get discounts.
- You just want to make money, so your discount would be marginal anyway.
- You're having a laugh.....who you going to give this to Hoogstraten???????????? and estate agents who already suck up big fees

Local business

Living in the 12 wards

- No comments
- ❖ A good incentive
- ❖ Again, must be a good idea
- ❖ All for encouragement.
- ❖ Clever idea x 2
- ❖ Clever idea, good incentive.
- ❖ Clever. Will encourage participation.
- ❖ Encouragement is worthwhile.
- ❖ Encouragement will help.
- ❖ Excellent idea.
- ❖ Good idea, fully support.
- ❖ Good idea. Will encourage participation.
- ❖ Good incentive x 2
- ❖ If it encourages the landlords to take part, then go for it.
- ❖ If it encourages, yes, then do it
- ❖ Incentives do work
- ❖ Incentives do work and this is a good one that will too.
- ❖ Smart idea x 2
- ❖ Smart idea that will encourage participation.
- ❖ Smart idea. We have got to get as many as possible "on side" and this aspect of the proposal does that.
- ❖ Use all ideas/incentives we can to get people taking part.
- ❖ Welcome the idea of incentives like this as it will boost the participation.
- ❖ Will boost participation.
- ❖ Will encourage compliance
- ❖ Will encourage increased participation.
- ❖ Will encourage landlords.
- ❖ Will encourage more participation and that has to be a good thing.
- ❖ Will encourage participation in the scheme.
- ❖ Will encourage participation, so I support.
- ❖ Will encourage uptake which must be a very good thing.
- ❖ Will give "status" to the scheme and encourage participation.
- ❖ Will increase the numbers taking part, so a good idea.
- ❖ Yes, if they perform to those standards then they should be encouraged.
- ❖ Yes, it will encourage the landlords
- ❖ Yes, it will give status to those organisations and will encourage their members to support the proposed scheme.
- ❖ Yes, just the kind of incentive that is needed.
- ❖ Yes, use the experts. Get them to encourage their members to buy into the scheme.

- ❖ Yes, will encourage more participation.
- ❖ Yes, will give status to the scheme.

Living in other areas of the city or outside of the city

- Perhaps there should be an Ethical Letting Agency?

Other

Living in the 12 wards

- I think this would be a brilliant idea if it was coupled with a higher fee. This would provide landlords with a greater motivation to meet national standards of good practice and ensure their tenants were respectful members of the local community.

Living in other areas of the city or outside of the city

- Only if the proposed landlord/agent scheme has the same 'minimum' conditions
- The fee is very low to start with. All landlords should be forced to meet the required standards.
- Yes, could be an incentive
- Yes, reward good landlords and stop bad ones from functioning

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

7b. If you answered the scheme should be introduced in 'more areas in the city' or 'fewer areas' please let us know which areas you feel should be covered and why

Home owner

Living in the 12 wards

- A more targeted scheme e.g. flats above commercial premises in London Road, Preston Street, Western Road etc.
- Focus should be in conservation areas or areas where houses have clearly been converted into flats specifically for renting. A quick search on Rightmove, is also a good way to see the condition that some flats are being let which is a good indication of some awful landlords and/or letting agents out there.
- Introduce the scheme right across the city, all areas, why not, if you are trying to improve the private rented sector
- The Housing Act 2004 does not specify how an "area" for selective licensing should be defined. But it is clearly intended that it should be more or less homogeneous in relation to the demographic criteria referred to in Section 80. There is no reason why an area defined by a political boundary, such as a local authority ward, should be homogeneous in these respects. East Brighton ward, for example, ranges from the Whitehawk Estate in the north to the East Cliff Conservation Area in the south. Data are not normally recorded by local authority ward. A more robust and consistent evidence base is provided by the LSOA data from the ONS which many local authorities, including Blackburn, Bournemouth, East Staffordshire, Hastings, Havering, Luton, Manchester, Newcastle, Pendle, Peterborough, Scarborough, Telford, Thanet, Woking, etc. have used to justify proposals for selective licensing. It may be that a local authority ward is demographically homogeneous. But unless this can be shown on the basis of the finer evidence that is freely and easily available, it is open to legal challenge whether the designated "areas" are consistent with the intentions of the Housing Act 2004.
- ❖ No comments

Living in other areas of the city or outside of the city

- Areas of the city where there are recognised problems such as accommodation over commercial properties and the like where often transient people live and work on the premises and fire

safety is inadequate.

- Sink housing areas and central only

Private rented tenant in Brighton & Hove

Living in the 12 wards

- Does it need to be more targeted, where poor housing conditions are widespread?
- Selective licensing is ridiculous. There should be licencing of ALL houses, in ALL wards of the city, no matter who lives in the houses. Having different, inferior requirements for families is also ridiculous; all houses, all wards, all tenants “ it should be the same for everyone. Safety is safety and should not be compromised for any subset of society.
- Should be city wide - all properties should be to the same standard regardless of where they are.
- ❖ No comments

Living in other areas of the city or outside of the city

- I can't answer which areas of Brighton & Hove should be the guinea pigs

Social housing tenant in Brighton & Hove

Living in the 12 wards

- No comments
- ❖ No comments

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- No comments
- ❖ No comments

Living in other areas of the city or outside of the city

- No comments

Landlord of property in Brighton & Hove

Living in the 12 wards

- I do not have sufficiently detailed knowledge of the real problem areas. I believe that selective licensing should only be introduced where you have a real and obvious problem which is not based on such nebulous statistics as noise nuisance reports - which come in our experience more from leasehold properties and holiday lets!!!! Than from the PRS. Such areas in Brighton & Hove are very small - I certainly doubt that Brunswick/Adelaide falls into that category - having lived in Lansdowne Place for 20yrs - I have called the noise patrol myself for three instances all of which were caused by owner occupiers. All of which I ended up resolving myself with help from neighbours by removing and tossing away their mains cut our fuses after police achieved nothing for several nights on the trot! (paying an electrician and EDF £100 each next day to have electricity restored certainly stopped them)
- I don't know enough about all the areas to say which should be included. I don't believe that Regency ward should be included.
- As indicated above I think the scheme, if considered merited, should be trialled in the worst-affected location and the impact of such a scheme measured before wider implementation.
- In my area of South Portslade, there are no anti-social problems, and yet being lumped in with other parts of Portslade that have a much higher density of rented accommodation. Feels extremely unfair that similar kinds of streets in other parts of city would not be included, and yet here in Mill Lane we are served badly by the whole of the ward being under the licensing scheme. Our property is a semi-detached family home. Just seems wrong. As said earlier, the additional costs will be passed onto tenants.

- Surely if the scheme is to improve housing for Brighton & Hove then all wards should be covered. Those wards excluded I suspect are the wards who most need to be covered.
- This should be focussed on student housing wards
- Where all the student lets are and the narrow streets in Brighton where rubbish is a problem
- ❖ No comments

Living in other areas of the city or outside of the city

- As mentioned earlier such a blanket approach was never intended by government and is probably unlawful. Brighton is attempting to introduce such a scheme that virtually no other LA in the country has found a need for.
- I have flats in the West Hill area. I do not think that it has an anti-social behaviour problem or that the properties are in a poor condition. The wards cover too wide an area. The council should target individual streets where it is considered a problem
- I would focus on those areas which raised the problems described (as I don't feel this apply in my area)
- It should be one rule for all Brighton & Hove or not at all!!
- Lewes Road and Waterloo Street area. So called problem areas
- Only those areas of older properties which may be sub-standard
- Other areas such as Woking Council where I also have a property, has used its data to analyse the street where there is an actual issue and has proposed a scheme with takes in just those few streets. Manchester Council has done the same thing targeting specific problem areas. The Brighton scheme smacks of revenue raising and an "aren't we progressive" attitude, rather than an effort to actually deal with real issues in specific areas, which the council already has powers to deal with and in most cases that this scheme will not help.
- Where are the most complaints - start there!

Local business

Living in the 12 wards

- No comments
- ❖ No comments

Living in other areas of the city or outside of the city

- No comments

Other

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- No comments

8b. Please provide additional comments to explain your response regarding online applications and payments

Landlord of property in Brighton & Hove

Living in the 12 wards

- A get rich scheme with a minimal involvement by the council
- All houses in the entire city, no matter who lives in them should be licensed. The definition of HMO has no place in licensing or rental properties; "properties which are two or more stores,

occupied by three or more people who are not from the same family and who share a kitchen, bathroom or toilet". What is a "family"? Being part of a family or not part of a family is irrelevant in the appraisal of accommodation standards. "Who are not from the same family" is very discriminatory terminology and has no place in housing standards assurance. It is indefensible that families should be expected to live in accommodation of lower standard than people who are "not in the same family"... whatever that means. The safety and quality standards of all houses of two or more stories throughout the city should same standard for all people irrespective of their sexual or otherwise relationships. Further the bar should be set quite high and BHCC must lead by example in quality standards (beyond basic "HMO" standards") it demands of the private landlords it purchases accommodation from. Linking housing standards to the relationship[s among people is complete nonsense. It is high time councils stopped being so irresponsible about with residents' safety. Brighton and Hove City Council (BHCC) itself is a huge purchaser of some of the worst quality, revolting, slum accommodation in the city. Particularly, so called temporary, emergency accommodation that is purchased from a small collection of private landlords. BHCC routinely pays £40-£140 per night, per revolting bedsit, in privately owned HMOs that most of us would not keep a dog in. Such accommodation falls so far short of what any local authority would be permitted to provide directly it defies description. There is no definition of either temporary or emergency and indeed much of the slum accommodation purchase is for long-term tenants. Vast sums of taxpayers money are spent with just a handful of private landlords to procure temporary accommodation without any contracts whatsoever in place; millions spent on spot purchasing. This not only leaves the system wide open to financial impropriety and corruption, it also results in complete failure of minimally acceptable accommodation standards to be set. The only standard that BHCC mandates for the grimy, shabby, soiled accommodation it so abundantly purchases is for the HMOs to have an HMO licence, which is basically sets minimal standards for room size, fire safety, and damp requirements. There are no standards for amenity, decoration, cleanliness, modernity, maintenance, facilities. It is indefensible. BHCC should clean up their own back yard and set an example with the private landlords they choose to do business with before setting standards for others. It is hypocritical and shallow to do otherwise. Lead by example. Comments that were recently overheard approaching a well-know temporary, emergency HMO in central Hove that BHCC Adult Social Care/ Sussex Partnership NHS Foundation Trust, purchase accommodation from to temporarily house mental health outpatients. They were complaining about the caked and dried defecate and vomit and how revolting it was for them to go there to work. People should not even be expected to visit these places in their work, much less be expected to live in such grim accommodation at the expense of taxpayers. If BHCC cared at all about standards they would start with the landlords they themselves pay eye-watering amounts of our money to for revolting, substandard accommodation. BHCC states in the consultation preamble that the by applying the additional licencing scheme the council is able to ensure through compliance with the license conditions, are providing well managed homes. HMO licensing in no way ensures provision of well managed homes. HMO licensing is little more than a space/fire/damp standard. BHCCs own profligate spending of vast sums of taxpayers' money on the grimy, soiled, revolting temporary, emergency accommodation HMO/B&B bedsits that are associated with a huge burden of antisocial behaviour, crime, deaths of young people and community disruption is a clear demonstration that licensing does NOT ensure well managed properties. BHCC profligate spending on revolting, soiled, grimy, "licensed HMO" B&B bedsits in the form of "temporary, emergency, accommodation". Defecation in the street, antisocial behaviour, stabbing, arson, drug dealing, abuse, innumerate emergency services visits - fire engines where there is no fire, police almost daily, ambulances when substance abusers think they have overdosed or get bored. The HMOs are lucratively sponsored by BHCC and other councils who use them for out-of-area placements, yet despite all the evidence BHCC refuses to act to ensure the safety and well-being of the surrounding community. BHCC actively contributes to the demise of a

maligned, ignored and neglected community through its failure to act to ensure existing HMOs sponsors are reformed.

- As I am new to this I found the information online confusing. I still don't understand the set 5 year payment. Do I have to pay in full if I join half way through. I also do not like to pay in full before anyone comes to inspect the property. As I have small houses I could chose at the moment to not have an HMO and just rent to families so I need to know how much work is involved in complying with stricter fire regulations and if it is cost effective for me. I have no way of knowing this if I can only apply online.
- As I am paying an Agent the only way this will work for me is if there is no charge to me.
- But instalment payments will help - particularly where someone is renting a property for the first time and has not yet received any rent.
- But you should note that all the people filling in this survey are clearly already online and have the access and ability to use your online services. You are simply not going to be hearing from people without this access if you are relying solely on an online survey, so these results will be skewed. This is going to be more of a problem as people age and lose access for whatever reason, e.g. lose sight, and many older people rely on rental income to supplement their pension.
- Classic example of public servants trying to ensure that their convenience is the overriding criterion for particular process being adopted. Many landlords would not have the necessary skill-set or have access to the internet. It must be available for postal applications.
- Elderly people may find internet use difficult and there should be a process where they can obtain assistance with the application at the council one stop shop
- Ensure the process is clear and not convoluted. IT system works effectively and efficiently (not always the case with public sector websites). A help line/contact details if there are technical questions/issues. Suitably secure payment process. Ability to receive a receipt/invoice for tax purposes.
- I know several older [late 70's] landlords with just a single small Hanover house that have long term tenants. I think they would like face to face help with the council as an option. NB Some older private landlords with just three bed houses sold up because of the need for a licence and the works required. It was not the three bedders that have upset local residents. Long tenants on low rents found themselves having to leave Brighton because they could not afford agency rental prices. It was an unfortunate consequence of the change from 5 to 3 persons licensing. The council does should not cause any more retired private landlords to sell up.
- I think a log in access code for all recognised HMO landlords or HMO applicants would be good.
- It makes no difference
- Just another red tape exercise and waste of money for landlords and waste of time. Go after the bad guys and stop annoying everyone in the city. Costs will only be passed to tenants. This will not solve problems and only push bad tenants to other areas. If you concerned about tenants, you offer them housing and monitor it. The recent fire in London only shows how bad Councils are and try to shift the blame to landlords who are struggling as it is.
- Other means of application and payment should be offered. This would be much preferred.
- Other non-online only processes should also be allowed.
- Please make it user friendly - this survey is a good example as it's been very easy to use. Not all of us are computer whizz kids!
- The recent placing of resident parking permits on-line shows the Council is incapable of running an online system.
- There are a number of problems with the operation of the Council's online systems at present so it should not attempt to introduce a further system whilst these are unresolved.
- This reads as if it is already intended to be implemented.
- We look after approx. 50 properties, some we own, some we look after for some elderly retired professional landlords you are asking us to find £25,000 out of a finite budget - just so you know

we charge the same or less rent for a decent, clean, ventilated, double glazed, insulated, part furnished, one bedroom flat that happily houses 2 people (£150-£161/wk) - than a single person will pay for a bedsit in the same area (£150/wk. excluding bills up to £208/wk. including bills). The bedsit building pays one license fee for all its rooms. Thus we would now be at a double disadvantage. paying a fee per unit and getting less rent for twice the space and amenities than an HMO

- Will direct-debit payments be made available?
- Yet again the question is posed in a manner that any answer gives acceptance to the council's proposal. Should the council succeed in forcing this through then I would pay either by cash or by cheque, I do not do any financial transactions on line for security reasons.
- You cannot assume that every house owner is internet-savvy - and how will you contact such owners in the first place? There ought to be some provision for the people.
- You do not explain how you will sort out malicious antisocial behaviour claims being made. What is the gain if a licence scheme results in problem tenants being moved on, no doubt being evicted through a section 21 so the new landlord will have no idea what they are taking on. The council does not inspect and manage its own tenanted properties. A licence scheme will bring about an increase in my own house and car insurance. This is will bring about an increase in tenants house and car insurance.
- ❖ I am skilled on IT but not everyone is, so you might want to bear that in mind and also offer something like a dedicated automatic telephone service for it.

Living in other areas of the city or outside of the city

- All online transactions I have done have worked well
- Email or phone support for questions regarding application. Decent supporting notes making things very clear (e.g. who can issue an electrical safety certificate) and sources of help
- Fine as long as it just needs simple info and not drawings, certificates and attachments as then I may as well do a paper form.
- How will you judge success? How will you decide if this was the best bang for such a considerable buck.? What is the second choice and why is this proposal marginally better? You seem to have ideas on how to spend money that is not yours but an idea how to judge value for money.
- I already have experience with selective licensing elsewhere. It is time consuming, costly and reduces the number of privately available properties to rent. I for one will no longer rent the property which I have been for the last 15 years. My tenants would have to find alternative accommodation. I am a good landlord, charge a fair rent below market and maintain my properties, but this additional layer of work and cost through selective licensing is too much to bear.
- I am not actually affected directly as my only property in the city is in North Portslade
- I live 5000 miles away. The internet would be the only way you could communicate with me, if this poor proposed scheme went ahead.
- I would like to know how landlords will be informed in the first place as we strongly disagree with being fined or having to pay an increased fee because I wasn't notified of a change to the licencing system. It will also help us to decide whether we wish to withdraw our properties from the PRS.
- If you insist on going ahead with this, at least have a helpdesk where someone answers the phone in under 5 mins (unlike the council tax phone line).
- It sounds as if you (the council) have pre-empted this decision already as such "if you have decided "this is not a consultation. However as I don't do computers at my age I always value the assistance of you helpful officers at Hove Town Hall
- Like I said it is a second council tax. I currently pay for maintenance to a management company. These are the people you need to get after. Massive payments for nothing, then when a repair comes up they ask for more money

- Make it work properly!
- Make payment £0 not against good property I would suggest inspecting every house in the city private and not then you will actually find bad property rather than the usual discrimination of Brighton Council.
- Make sure the thing works - Hastings was a disaster
- My experience of your website (parking vouchers) is that it's very poor and erratic - please make sure this works
- Need to ensure our agent has access on our behalf as well as us being able to complete it.
- Not every landlord is online. If you're doing it via the councils website the info will go straight into the computer system for the council and cost less to implement as the landlord is doing all the work. So why is it going to cost £460? Will this be a public record. Can people see who is a landlord? What about data protection?
- Online payment systems are not appropriate for everyone, however, they should initially be asked to pay this way. There should be a cash system for people who request it.
- The interface for making payments to BHCC for other services is one of the worst I've ever experienced. It needs to be brought kicking and screaming into the 21st century!
- There should be a provision for payments to be made using on line banking. Why do you need to have the opportunity to collect details pertaining to my banking arrangements. How long will you be retaining this data for. This is a one off payment, payable again in five years time. If you were to offer an instalment option, then I can understand the need for you to collect my banking data.
- This is highly discriminatory. Not all landlords are computer literate. This proposal would be open to challenge. There must be a paper option
- This scheme should not be implemented
- Were the scheme to be introduced I would like to see a scheme where registered managing agents could register landlords at a much reduced fee.
- What about older landlords who are not online or computer literate of which there are a number in Brighton
- Whilst the application is OK for me, I have done it for a smaller HMO (additional scheme in Central Hove) one my companies would need to pay via bank to bank transfer rather than debit card which it does not have. This may be similar for many landlords. A lot of the landlords now are also getting on a bit and can barely switch on a computer so an alternative should be offered.
- Yes, don't introduce selective licensing
- You're not getting another penny out of me for providing housing that you are incapable of providing. Have you ever tried to get a rented property when you are on benefits.....well we let to them....you should be using an incentive scheme to get us to provide housing not using a punishment. You are going to lose all the generally good small landlords and be left with the big businessesand good luck with that if you think it will improve things! Rents will be forced up yet again!

9. Please provide any further comments you have about the proposed scheme

Home owner

Living in the 12 wards

- All conditions within the proposal are all things that "fit and proper" landlords are required to do with the exception being that landlords now have to pay £450 every 5 years to the council just to prove that they are doing it with the added stress of having to provide documents/proof to the council. This seems like additional administrative work for the council with private landlords footing the bill for presumably criminal or rogue landlords. The Council already has enforcement powers to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should

continue to direct its resources at effective enforcement activity. The reality is that good landlords will apply for licenses and are likely to pass the cost on to tenants in the form of increased rents, doing nothing to address affordability. This is whilst the worst landlords “the criminal operators” will simply ignore the scheme, as they do many other regulations. The Housing and Planning Act 2016 has given local authorities substantial new powers to tackle breaches of housing legislation and drive the criminal operators from the sector. The council should wait until the impact of these new powers can be assessed before pressing on with more regulation in the form of selective licensing.

- As this will add to the landlord costs, will this be recovered through higher rents?
- Brilliant idea but it should be for shorter periods and more money. A one bed flat is 950 per month these days - the amount you are suggesting over 5 years is a pittance in comparison
- Enforce harder on externals and quality of management.
- Excellent and overdue proposal
- How long does the place have to be let out for to need a licence? - I presume "2 weeks" counts as a "holiday let" and doesn't need a licence, but is there a borderline? What if someone away for a few months lets their flat to a letting company - who needs the licence? What happens in the introduction period? - Will every land-person in the 12 wards be applying for a licence all at once, and if so, can the council really turn the applications round in a sensible time? How will this work?
- I am concerned that this scheme will reduce the overall properties available to rent in the City and will not address the central issue that we have in Housing which is lack of supply. I am not sure there is much evidence that this will drive up standards as the Landlords that will be minded to comply probably are not the ones you need to target
- I have lived in Brighton since 1983 and have lived in private rented, social housing and now own my own home. People who rent privately have a right to decent and affordable accommodation.
- I want to hear about and discuss the proposed HMO changes - but Q9 in and nothing so far!! I hope we get to that however as it took up to Q7 to tell me the licenses would be for 5 years I am not convinced we will. So I will say my piece now: I do not want any increase in HMO's. They are a blight on the city and only serve to line the pockets of those who do not give back to the community. Whilst some profit, most suffer. It should also not be permitted for estate agents to obtain licenses for their own HMO's through secondary companies as is now the case. I am extremely disappointed and annoyed that a portion of the £1514.50 I am paying to your overpaid 'executives' was not used to have a proper, timely, conversation with those of us in the city who own our properties and are not here to profit at others' expense.
- I welcome the licensing of private rented housing in the City centre, to improve standards for the benefit of tenants and local residents. But in the last few years there has been a big increase in unregulated holiday lettings through web sites like Airbnb. The Environmental Health Department say HMO licensing legislation does not cover holiday properties as the length of stay of the occupiers is not long enough to qualify as a primary residence. But some landlords now let for long periods through holiday websites to avoid private sector regulation. For example, in my street there are four terraced houses let through holiday websites. The house next door is let through Airbnb.com by the owner who lives in South Africa with only a cleaner supervising the property, these houses have been let to students for periods of three months. In London, holiday lets over 90 days a year require planning permission. I suggest Brighton & Hove City Council ask Government for this 90 day planning limit so that longer periods are covered by the proposed new licences.
- I wish to emphasise the importance of taking action to deal with the increasing negative impact on people's lives of Party Houses. These rented properties must come within the Council's Licensing scheme and landlords made responsible for the actions of those to whom they let their houses. The Council must be proactive in dealing with the impact of such houses. In the past the Council has done very little to help those whose lives are blighted by party Houses, fearing the

impact on trade. Here is an opportunity. I hope the Council takes it.

- I would also like the monitoring of the Airbnb economy. Many landlords are evading licensing by offering holiday contracts. I know of 4 people who rented a 1 bedroom flat on an Airbnb basis for 2 lets of 3 months. Obviously this is overcrowding and is not addressed in the scheme.
- I would like to know what you propose to do about tenants who abuse properties and what their scheme and requirements for being a good tenant is.
- It can only improve living conditions in Brighton and Hove for the residents
- It is vital to have some checks and measures in this massive area of concern for residents
- It should cover Goldsmid ward
- Just because a site has planning permission does not mean it is used / occupied properly. There should be ongoing reviews and no assumption that a site with existing permission should not be part of review. What about the floodgates for Planning when this is near being approved!
- May be more useful to provide clearer conditions/ extend those set out for additional licencing to smaller rented accommodation. Needs rigorous enforcement and harsh penalties to work.
- Mixed blocks of flats - where most are owner-occupied and a minority are rented out - urgently need some means of ensuring that the landlords take their responsibilities seriously. Normally leases contain conditions about not disturbing neighbours etc. but the cost of enforcing lease conditions, which have to be borne by the other Leaseholders, can easily be flouted by uncaring or obstructive landlords. This causes ongoing disturbance to both owner-occupiers and other landlords and their tenants. This scheme would go a long way to improving the experience for tenants of bad landlords and their neighbours.
- More contact details are needed on the HMO licensing register so residents can contact landlords/ agents quicker.
- No areas in the city. Yes there needs to be consideration given to online only. What about landlords that do not live in the country. It's just another tax. Why don't you concentrate on existing problems and convert shops for housing rather than introducing yet another scheme! Fine landlords now who do not provide good quality homes. You already have information via council tax etc.
- Overall I feel the universities are not taking enough responsibility for their constant expansion and it's having a negative impact on this and other areas of the city.
- Party houses!!! There are at least 3 in Margaret Street.....with 12 people in each house. They are extremely noisy, create rubbish and smoke out side at 4 in the morningUsually in large groups.....wakes everyone up.....it is antisocialand the landlords don't care.....so we need strong council regulation. Surely such party houses should not be allowed in resident roads?
- Scheme should cover short-lets - weekends. Partly nights
- Some consideration should be given to landlords who operate HMO's without licences. Retrospective HMO licence application should be discouraged and more investigation of property and length of time let unlicensed should be done.
- The council is far too inefficient to run any such scheme. It should target only those few rogue landlords or letting agents who provide a poor quality of accommodation and service to tenants, and leave the rest of the system to get on providing good quality accommodation at competitive prices to meet the great need in the city.
- The scheme is too large and therefore unworkable to spend the money generated would require the employment of 40 staff, there would be recruitment problems
- The whole scheme needs to be looked to ensure that local communities are not unduly effective by bad decisions on the council's behalf.
- This is a great idea and will help protect tenants from being further exploited by landlords
- This will only put up rents which are sky high already.
- Why are Party Houses not included? Why doesn't the Council investigate the landlords/owners of the thousands of privately rented flats and houses that are used for party houses, but are not classed as HMOs, and charge them too?

- Why is the scheme only for 5 years? Why is it going to cover only 12 wards, surely properties in all wards need to be covered by these licences?
- ❖ A "no brainer", needed and will work.
- ❖ A good scheme well worth supporting and I do
- ❖ A lot of info to absorb about the scheme. Very patient and helpful interviewer.
- ❖ A success in other parts of the City and will be here too.
- ❖ A very good and valuable scheme for the City
- ❖ About time too!
- ❖ All for it
- ❖ All in favour of it, these proposals
- ❖ All thought out proposal that I support
- ❖ Am against the scheme
- ❖ An excellent scheme that I look forward to coming into force as soon as possible.
- ❖ Best left to the market rather than a council
- ❖ BHCC to keep out of these commercial arrangements
- ❖ Clearly, lots of hard work has gone into these proposals and I hope they bear fruit.
- ❖ Despite best efforts of interviewer with facts and information, not able to decide.
- ❖ Do not support proposed scheme.
- ❖ Excellent proposal from BHCC. Very timely and will boost the City as being a good place to rent.
- ❖ Excellent proposals - fully support
- ❖ Fully support x 9
- ❖ Fully support proposed scheme, will boost/support the rental sector and challenge homelessness.
- ❖ Good idea/scheme
- ❖ Good luck!
- ❖ Good to see BHCC being proactive and consulting us on their proposals.
- ❖ Happy with the proposals
- ❖ Having weighed up the details and discussed with the interviewer, I am not convinced the scheme will work.
- ❖ Homelessness is a concern and an issue in our City. Great that BHCC are developing policies to challenge it.
- ❖ I am a home owner. Many will never be, so it is important that those who are renting "get a good deal".
- ❖ I support this well thought out and well explained to me scheme.
- ❖ Long overdue
- ❖ Long overdue. Needed. Boost for the City.
- ❖ Long overdue. Support
- ❖ Looking forward to the boost to our community once this proposed scheme is adopted.
- ❖ Need much more time before I can decide
- ❖ Needs to be done
- ❖ Not convinced on the merits of the proposed scheme. Sorry, cannot support it.
- ❖ Not sure, personally, whether it is all worthwhile but happy to accept the "majority" view.
- ❖ Overdue!
- ❖ Really hope scheme is adopted
- ❖ Strongly agree with all the proposals
- ❖ Support proposed scheme. Will help the rented sector and the wider community.
- ❖ Support the proposed scheme and look forward to it becoming agreed by the Council. Big thanks to interviewer who explained the points fairly and with patience.
- ❖ Support the scheme as detailed by the interviewer and the documentation
- ❖ Thank you for the chance to have my say; will benefit South Portslade.
- ❖ Thanks for the interview x 2

- ❖ There is lots of information to take into account when answering these questions
- ❖ These proposals that I agree with, should be adopted across the whole City.
- ❖ Understand that similar licensing schemes are up and running in other parts of the City. We need one here too.
- ❖ Will help our local community
- ❖ Wish success to the scheme but have my doubts

Living in other areas of the city or outside of the city

- Concerns about how the scheme might be resourced as the council cannot recruit qualified and experienced staff in the current climate.
- I am a solicitor, admitted in 1986. I used to practice as a specialist legal aid housing solicitor in the London Borough of Southwark until October 2013. Currently, among other things, I provide training on housing issues with groups of community workers in London. I am not myself a private renter or landlord but I have extensive experience of the problems associated with private renting through my clients and currently through the community workers present at the training. I also have current and past friends who have rented in Brighton and Hove. I note that the highest proportion of non-Decent Homes is in the private rented sector (28%, English Homes Survey 2015-16), and that tenants rarely complain principally because of the high demand for properties and fear of eviction (Shelter report 2014). The poor quality housing is concentrated at the cheaper end of the market where the level of housing need is highest, which also militates against tenants complaining (this is evidenced in the same report). As a result we cannot rely on the occupiers to enforce their rights to have their homes repaired; the only means for improving poor housing conditions is through local authority enforcement. Under the present regime of austerity and cuts to council services, it is hard for the environmental health departments to have any impact. A licensing scheme, the revenue from which is ring-fenced for enforcement and regulation of the scheme, will help a great deal; I am very encouraged by the evidence supplied that existing licensing of smaller HMOs has had a good effect. I therefore heartily support both the proposed schemes, that is the citywide Additional Licensing scheme and the Selective Licensing Scheme. I would also support any attempt to extend the second. The burden on a good landlord, amounting to only a hundred or so pounds a year, will be minimal.
- I am pleased that the council is taking the initiative here. For too long it has been too easy to spot houses that are uncared for as they have been rented out. I and many of my neighbours have personally suffered due to delinquent landlords inability to repair ancient fire alarm systems
- I would like the scheme to be city wide, but understand that national requirements mean that this can not happen.
- The cost of the scheme will inevitably be met by the tenants therefore increasing already high rental costs in the area. I believe the most effective way of improving standards in local housing is by improving supply and thereby reducing demand of properties in the area making for a more competitive market.
- This scheme does not have much thought put into and being rushed.
- Unfortunately the proposals go down the same road as other 'initiatives' in the city. Each time some kind of plan is made for only some selected areas, the problems get pushed into areas that have not been selected and eventually the whole plan has to be extended. This has become evident with the HMO Additional Licensing Scheme, whereby you are now consulting on making it citywide because a lot of HMOs started appearing in wards that were not included originally. Similarly, with residents' parking schemes, introduction in various streets and zones pushed the parking problems into places where there wasn't a problem, so that they ended up needing schemes as well. Additionally, I am totally unconvinced that the council has or could have sufficient resources to deal with this proposed selective licensing scheme, especially given ever-increasing budgetary constraints. We know that there has been a problem in the Planning Department for some considerable time (unsurprising, since the council seems to receive

approximately 70 applications per week) and anything difficult/complicated or controversial seems to consume endless amounts of officers and councillors' time, often followed by an appeal. This proposal will not work unless you have or acquire the human resource to deal with all applications in a timely and efficient manner. That is not to say the basis of the proposal is wrong or unwelcome - just that it is ill thought out and there is nothing in the documentation about resourcing. I cannot see how it will be self-financing with the level of fees suggested, since it seems to me that you would have to recruit and train many more people to run it properly, which would take a long time, and meanwhile the problems escalate into other wards - indeed, this is already happening as more and more relatively small houses are extended, subdivided and rented out, with resulting pressures on the Planning Dept..

- You are using a sledgehammer to crack a nut. Better to pursue the HMOs

Private rented tenant in Brighton & Hove

Living in the 12 wards

- Another great idea by the Council to make more money which will come from the poor tenants anyway. Don't do it.'
- Fully support scheme, think it's a brilliant idea and badly needed. Think it's an excellent idea - for all, social responsibility accountability for the council, tenants and landlords.
- Has anyone checked this with Tenant organisations like Shelter, Brighton Housing Trust and considered safeguarding issues?? Have you considered these issues from the tenant side?? I strongly object to this scheme, the way it would be implemented with 6 monthly inspections, the fact that it ignores and undermines basic fundamental tenant rights and the justification used for this intrusive regime which is biased and limited. Why should all private tenants be subject to this regime? Tenants have their own rights. Tenants have their own absolute rights. I'm not sure on what basis you assume the right to interfere in tenants' rights, tenants rights to live in their homes. Why should all private tenants be subject to this intrusive regime with 6 monthly inspections and other random inspections? Why should all private tenants be subject to this unjustified regime, as if they have done something wrong or there is something wrong? Why should all private tenants be subject to this unjustified intrusive regime as if they are anti-social/criminals? The scheme is all about the landlords with 6 monthly and unspecified random inspections within life of licence, no consideration of tenant whatsoever in all this, their circumstances and how it affects the tenant. This scheme is overbearing and onerous. What about tenant rights, you have not considered this? What about tenant rights to live peacefully in their own homes? Why should tenants be treated like this as possible/potential anti-social criminals, subject to continuous and random unjustified inspection? The scheme is all done through the landlords, so you effectively undermine tenant rights. The costs of all this, implementing this licensing scheme, implementing housing changes, can be passed directly onto the tenant. This will lead to rent increases for those that can least afford, making rents and housing in Brighton even more impossible and unaffordable than they already are. If there is a problem, any problem at all, the tenant can simply be evicted. You don't address tenant rights, high housing costs, housing shortage; that all costs can be passed onto the tenant. You cannot justify this scheme on direct housing issues so have used the trumped-up indirect issue of Anti-Social behaviour effectively labelling all private tenants as potentially anti-social, potential criminals, future criminals, who need to be checked-up on and inspected. The proposal has completely failed to justify that the scheme needs to be introduced across the city in 12 wards. There is no justification for this whatsoever. The Selective Licensing Scheme seems to be a cut and paste job of the 'Additional Licensing Scheme for HMOs', almost exactly the same word for word, without further justification on why licensing needs be extended to all privately rented homes. I am sure this scheme will not affect you and you would not tolerate this regime yourself. This proposal is a shocking outrageous disgraceful abuse of power.
- HMOs negatively impact professional sharers and this should be taken into account.

- Housing standards and safety are crucial to enable tenants to feel secure in their homes.
- I am retired with the experience of many years of renting. This scheme will support younger people against poorly performing landlords, who take advantage of their inexperience and don't like to complain.
- I do agree with the scheme I feel it could be ultimately beneficial to landlords/management companies and agents. I have seen reports regarding Newham council who are running a compulsory licencing scheme which has seen Newham ban 28 landlords, issued 2,170 notices to improve properties and recovered £2.6m in unpaid council tax. They have also passed on details of landlords not declaring tax to HMRC which is estimated 13,000 Landlords. I can see a lot of benefit to the scheme and feel the pricing structure is very straightforward. I have however seen an increase in landlords switching to holiday lets so might be beneficial for the scheme to monitor this activity also and try and maybe somehow incentivise private rentals to local residents where appropriate.
- I don't believe it will improve conditions and some landlords will increase rent to cover the costs
- I hope that conclusions drawn from the scheme, and perhaps anonymised data, will be released in five years' time.
- I think it is essential to accord with the situation of renting being the norm now for very many people.
- If the landlords are already paying a reputable agency to manage their properties, perhaps they should be exempt from this scheme. The proposed scheme could be seen as a sledgehammer to crack a nut in these circumstances. However I understand that this scheme could protect vulnerable tenants living in sub-standard accommodation, where the landlords are exploiting them, either intentionally or because they are ignorant of the standards required.
- It will be very beneficial for everyone renting the property to have reassurance in landlords because often they turn out to be aggressive, short tempered people and there are no regulations in place to ensure that the tenants entering into long contracts aren't being harassed.
- It's not going far enough or is rent capping somewhere else on your agenda? Private landlords get estate agents to assess their properties and advise rents for the "current rental market"I'm too angry to continue! I moved 3 times in 2016 and was shown around an array of overpriced, inadequate, unacceptable examples of "flats to rent" which were actually squalid hovels all priced at £750 and above! It's a disgrace! It needs sorting, now! Hopefully, if this scheme goes ahead some form of change will occur.
- Mandatory 6 month inspections seem very intrusive for a tenant. Do you force homeowners to remove graffiti? If not seems unfair to force landlords/tenants to do the same. Can anything be added to the scheme to control rents? I currently pay 43% of my income on rent and earn way above the median salary for Brighton. I work in the tech industry and will probably move away to a more affordable city as I can't continue spending so much on rent. I know my company struggles to recruit for my job role so this problem of unaffordable rent will only make the brain drain worse for Brighton.
- More red tape and risk of rent increase. I do not like it!
- Please be mindful or plan for the impact this will have on tenants if landlords pass on the costs of repairs to tenants (which they are likely to do). Further - there are some strange rules in the licence document that in many ways counter other rights to a private home and family life; e.g. the 'overcrowding' rule attempts to stipulate how long tenants can have guests/visitors to stay (to two weeks). This is arbitrary and unfair and fails to recognise that people often come to stay for more than 2 weeks - depending on where they are coming from, or what they are here to do, e.g. arrange funerals, weddings, etc.
- Provides necessary regulation to rented market but only a huge council housing building scheme can stop this housing for private property fiasco. John Stuart Mill recognised that land as a finite commodity cannot be left to market forces and needs government regulation. Council housing

for all would destroy the private rental market at the lower end and that would be a good thing. I'm renting after my marriage broke up and frankly letting agents and landlords are milking tenants and not keeping properties in good repair. It is immoral.

- Should be proposed all over the City not just 12 wards
- The scheme should be extended to social landlords too. Everyone has a right to a decent standard of living.
- The standards and rules should be the same for everyone throughout the city. Many HMOs in the city, especially with bedsits, are very scruffy, run down and tired - HMO licencing does nothing about this.
- There's nothing wrong with the proposed legislation but a policy that is adaptable and empowers everyone to use their common sense regarding issues may be more effective. References are useful but discriminate against self employed
- This is a money making scheme
- This is a promising initiative however further interventions are needed to encourage truly affordable and decent housing.
- This is a start, but I must be honest; this doesn't seem to do very much other than put existing snippets from standard tenancy agreements into a further layer of bureaucracy. If you are remotely serious about improving the often poor housing and treatment of tenants by their landlords, this needs to go much further and be much more specific.
- This scheme would ensure greater protection for all tenants while also tackling problems such as anti social behaviour for all.
- Would there be a tenancy disputes service built into the costs where the tenant does not believe the landlord is upholding the terms of the licence?
- ❖ A good scheme that will have a positive impact on the rented sector and the wider community.
- ❖ All for it
- ❖ Awful lot of information to digest before expressing opinion
- ❖ Excellent idea. Thank you
- ❖ Excellent scheme clearly explained to me and my queries answered. 100% behind the proposal.
- ❖ Favour the proposals
- ❖ Fully support proposed scheme x 14
- ❖ Fully support proposed scheme. It will make our City and community better places to live in/be in.
- ❖ Fully support the proposal and will help protect to rental sector and reduce homelessness.
- ❖ Fully support the proposed scheme and am hoping it will reduce the numbers of the homeless in our City.
- ❖ Good proposals. Support.
- ❖ Good scheme. Good luck!
- ❖ Great idea/scheme
- ❖ I rent so will benefit. Re Q10 Use social media (Facebook etc.) rather than email.
- ❖ I support the proposed scheme.
- ❖ It is a "no brainer" - much needed and wanted
- ❖ It will help me, I rent.
- ❖ Scheme should be across the whole City
- ❖ Similar schemes doing well elsewhere. Looking forward to BHCC adopting the scheme very quickly here.
- ❖ Strongly support scheme x 2
- ❖ Support x 3
- ❖ Support proposed scheme x 3
- ❖ Support these excellent proposals.
- ❖ Thanks for the interview.
- ❖ Very much looking forward to implementation

- ❖ We rent, so bound to support/appreciate this BHCC scheme.
- ❖ Worried rents will increase. Did they in the other "adopted" areas?
- ❖ Worried that this will put up rentals

Living in other areas of the city or outside of the city

- Definitely needed - given that demand for housing in Brighton and Hove far outstrips demand, the market cannot be relied upon to safeguard decent housing conditions.
- I am concerned about the timing of implementing the scheme if it is done too soon we may not have an accurate figure of the private sector housing market factors post-Brexit to take an accurate review of the private landlords licensing scheme pilot within the proposed 5 year period and may not have accurate data to determine whether that pilot should be continued going forward. I am also significantly concerned about rent increases to private tenants (and other tenants as a result later) and inflation NB: Perhaps selfishly. As I am quite happy with my relationship with Private Landlord at this time and the rent I pay per calendar month. Perhaps the Brighton & Hove City Council would be gracious to exclude the Goldsmid Ward (at least I think I am that ward. My address is Q9 of the consultation, I humbly request excluding the ward which relates to that address).
- I don't want to be homeless. Whatever keeps a home for my family and friend.
- Scheme does not work. Ignores safety needs of families. Housing for families should not have lower standards than housing for 'non' families. There should be no distinction. All rental housing should be held to same high standard. The concept is ridiculous. Most of people who died in Grenfell were in families units. Fire does not discriminate. HMO status is nonsense that ignores families
- The proposals look good in general. The costs of the license will inevitably be passed onto tenants, though, and house prices in Brighton are already barely-manageable.
- This scheme should be citywide. This scheme should roll out alongside rent caps.

Social housing tenant in Brighton & Hove

Living in the 12 wards

- I feel this is very important. As someone who has lived in some shocking private rented properties in the past. It is important to protect the residents who often have no other option than to rent privately and are not in a position to acquire another place due to the high costs of rented accommodation locally.
- ❖ A very smart scheme. Would be amazed if anyone could seriously object to it!
- ❖ All for the scheme
- ❖ Bring it on
- ❖ Everyone across the City if the scheme goes ahead.
- ❖ Fully support x 8
- ❖ Fully support implementation of the scheme.
- ❖ Fully support. Lots to take in though!
- ❖ Good luck with the proposed scheme
- ❖ Important that BHCC protects the rights of those who are renting.
- ❖ In favour of the scheme
- ❖ In the interests of both sides for this proposed scheme to go ahead.
- ❖ Long overdue. Fair. Support.
- ❖ Need more time to consider the scheme and will go online to give my views.
- ❖ Need to think more about this. Interviewer has left me the literature and I will probably visit the online portal to give my views.
- ❖ Overdue, fair, support
- ❖ Overdue. Needed. Will work. Support.
- ❖ Strongly support the implementation of the scheme
- ❖ Strongly support the proposed scheme

- ❖ Support x 2
- ❖ Support the scheme
- ❖ Thank you for allowing me to contribute. Fully support scheme.
- ❖ Thank you for inviting us to take part
- ❖ Thank you for letting me have my say.
- ❖ Very much in favour of the scheme
- ❖ Will result in fewer landlords and higher rents
- ❖ Works in other parts of the City, so will help our area too.

Living in other areas of the city or outside of the city

- No comments

Letting/ managing agent

Living in the 12 wards

- No comments
- ❖ Seems logical
- ❖ It is upsetting and worrying to see so many people around here who are homeless/street sleepers.
- ❖ Clearly needed. Support.
- ❖ Fully support the proposed scheme.

Living in other areas of the city or outside of the city

- No comments

Landlord of property in Brighton & Hove

Living in the 12 wards

- Absolutely stupid proposal which will hit tenants in the pocket and increase social inequality.
- Anything that improves the standard of the private rental sector must be applauded as the general standard of rental properties in Brighton and Hove are pretty dire.
- As a proud and caring landlady of smaller three bedroom houses I feel I am being lumped together with unscrupulous greedy 'career landlords' with vast networks of properties where they cram in as many tenants as possible and do no repairs. I have seen these first hand and agree that they need close regulation. I feel all your time and money should go there rather than a very broad brush for all of us. Could we not have an initial inspection and then be placed in a separate category.
- Councils across the country are already finding that selective licensing is not the answer. In our beautiful fun town - please, please lead the way - work with us professional landlords who do this for a living not a pension to find a better way that does not cost our tenants even more rent! We want to invest next year in more properties in Brighton & Hove. We have a waiting list of people who want to rent from us because we are fair and straight and we try our best to be good landlords. But we can only do that if we can afford to. Whilst the prospect of tax changes and licensing is making the more nebulous buy to letters sell out (thank god) it only helps us to improve our portfolio and house more low income people if we can maintain our standards and our income stream - I know you don't believe this, but £500 out of our budget is a lot of money! We are currently installing mechanical ventilation systems in all our properties to improve air quality, condensation removal etc. Each unit we install costs us £482 to supply and fit - at a minimum of 2 units per one bed flat - -
- Crucially, that there should be greater dialogue about the undoubted need for a huge amount of student accommodation in all the areas of the city with two Universities and medical and art and music schools. But also that there should be a much more rigorous inspection of mouldy properties. This is a real issue. I have had mould in one of my two properties. I have, for the second time, undertaken comprehensive re-tanking, re lining and re- lining work plus new vents and windows. A lot of my tenants tell me that this is normal for them - i.e. they are expected to

live in mouldy unhealthy conditions. Brighton houses are infamous for this but it can be ameliorated.

- I agree that the standard of maintenance of some properties in the Brighton & Hove area is very poor. I feel that this is due as much to owner occupiers not wanting to spend money on maintenance as due to landlords. I feel that the enforcement powers of the council to deal with anyone's lack of maintenance, noise, anti-social behaviour should be fully exercised and financial and staff resources given to those departments. I appreciate this will require funds and lobbying for students to pay some form of council tax would help.
- I can see there might be some advantages to the scheme, but I am concerned that it will penalise landlords who are already striving to provide a good standard of rental property.
- I think it is very important to consider the difference between privately rented houses and purpose-built flats... the proposals don't seem to acknowledge this.
- I think this scheme will end up as a nightmare and will result in an increase in homelessness in the town
- I would like to have seen a fuller discussion of the problems the council is trying to solve and a selection of alternative approaches that could achieve the best results, or at least some indication that anything else has been considered. It seems you've just jumped straight into for the one with the biggest financial windfall for the council!
- I'm a landlord with a single property privately let out in Hove and think that the proposed scheme requiring all landlords to be licensed is excessive. I try my best to be a good landlord - I pay a mainstream management company to ensure legislation and best practices are followed and I also take a personal interest in the property management too, with a good relationship with my tenant, who is happy. I understand there are some bad landlords but putting unnecessary additional burden on everyone will have negative effects. Potentially some of the aspects of the proposed scheme, which go beyond current government legislative requirements, could be very expensive. Private landlords are being squeezed heavily by new government legislation - for example, within the next few years, due to tax changes, the profit on my rental will be reduced to very little. As a result, I'm already considering whether it's worth continuing, and additional bureaucracy and expense from the local council is no encouragement. My options would be to increase rent to make it profitable again, or just stop letting the property and sell it. The overall consequence of this on the rental market will be increased rents and reduced rental availability. My tenant is a single mother, with her son, and I know they consider my flat their home. They have limited income, so rent increases are difficult, and I would hate to end their tenancy as I know they don't want to move on, but I think that the licensing scheme for me would be the final straw. Private landlords provide an important service of giving people homes in Brighton, but they need support and encouragement, not additional expense and burden.
- Is there really a link between housing crime and the private rented sector?
- Is this tax-deductible?
- It is an unnecessary and punitive charge that is going to push up rents and make the council additional revenues in times of austerity.
- Money making scheme for the council with tenants and landlords both footing the bill;
- No
- Selective Licensing is a really bad idea
- Should be limited to a much smaller area of the city. Should be focused on specific types of properties.
- Some of the regulations already in place are not even enforced by the Council
- The Council already has enforcement powers to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its resources at effective enforcement activity.
- The Council is basing its argument for Selective Licensing on just two grounds (see p3 of the

"Consultation Proposals"). The first (ASB) is undermined by the conclusion of the Mayhew Harper Report itself, and the second (poor property conditions) is based on the incorrect assumption that the property improvements required for a house in multiple occupation (e.g. larger kitchens) are comparable to those for a single family dwelling.

- The council should offer more for landlords who do sign up to this as I'm sure this will be introduced in any event regardless of what anyone tells them. The council should introduce benefits for applicants such as not being charged council tax for void periods when the property is empty between tenancies etc.
- The evidence for the scheme by the consultants does not justify it. No mention is made of rent increases against benefits.
- The Housing and Planning Act 2016 has given local authorities substantial new powers to tackle breaches of housing legislation and drive the criminal operators from the sector. The council should wait until the impact of these new powers can be assessed before pressing on with more regulation in the form of selective licensing. Good landlords will apply for licenses and are likely to pass the cost on to tenants in the form of increased rents, doing nothing to address affordability. This is whilst the worst landlords "the criminal operators" will simply ignore the scheme, as they do many other regulations. The Council already has enforcement powers to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its resources at effective enforcement activity. All the conditions in the proposal for selective licensing are all the things that good landlords (and letting agents) should be doing anyway and is enforceable by law. I do not see why landlords need to fork out an additional £460 to prove this
- The proposed license costs are quite high, and will inevitably be passed on to tenants. There should be reductions for multiple property landlords.
- The scheme should apply to any landlords that are not on the radar. Such as privately rented properties who have not advertised through an agent. This is more important for the country's security for the prevention of organised crime and illegal immigrants. Agents are checked for all of the above. A scheme is not improving properties you do not know exist.
- The selective licensing scheme has been ill thought out. The council is targeting the private rented sector as a cause for any problem occurring in Brighton. I would point out that there is probably more problems arising in the council owned properties in the city than in the private sector regarding anti social behaviour!! Of the complaints made by PRS tenants to the council regarding their rented property, how many are found to be unwarranted following investigation by council inspectors? How many complaints are made by council tenants?? Where in Brighton are all the run down and dilapidated properties such as is found in the north of England? I see that there are approximately 80 complaints regarding rented property made to the council each month, some of which will be unwarranted, this is an extremely small figure when it is compared with the 27,000 private rented properties in Brighton that the council wish to impose licencing on. If the team of council inspectors cannot get to grips with two or three complaints per day then I suggest some in house training is required. The council must know who the odd few rogue landlords are in Brighton and should deal with these, indeed they should have been dealt with long ago. The vast majority of landlords are responsible and are fully aware of their obligations toward their tenants, the law and all local regulations. Do not use a sledge hammer to crack a nut! Selective licencing will achieve very little except for improving the councils financial status by about £23 million per year. Lastly, I will not be answering the questionnaire regarding the Equality Act. I consider the questionnaire to be both racist and sexist in its very nature. The idea of the Equality Act was to make everyone equal not divide people into separate groups or types, which is what you are attempting to do.
- There are thousands of private flats in Brighton & Hove and it will be a huge bureaucratic exercise to license them all. Since the great majority of flats are fine then this will be a huge

waste of time and money. The alternative is to tackle the bad properties using existing powers. I understand the argument is that tenants do not want to complain about properties in case they are evicted but the Government has outlawed retaliatory evictions. Also there are often unintended consequences with new legislation - in the present case it seems likely that some landlords will sell up rather than deal with all this bureaucracy. This will reduce the rental housing stock.

- This scheme will achieve nothing but raise revenue for the council and the expense of landlords and tenants. This will raise rents, reduce supply and marginalize the least well off in the city. What we need is clarity not additional charges.
- Waste of time and money - clearly introduced for financial gain or ideological reasons. The only obvious consequence of the introduction of this scheme would be to reduce the stock of badly needed rental property for the lower paid residents of this city. Leading to an increase in rents and homelessness.
- Waste of time and more red tape. We will pass the costs to tenants and it will only push bad tenants to Councils as no landlord will take them. Wake up and smell the coffee.
- We (my partner and I) fully support the Residential Landlords' Association comments (letter of 5th September 2017 from Ms India Cocking). We have 2 properties in Brighton, one covered by the proposed scheme and one not - we are not clear why there is a difference. We purchased and let the flat you want to licence in 2001. Since then we have had 2 assured shorthold tenancies in that flat, one for a couple who stayed for 16 years and had 2 children while they were there. They only moved out to a house to give more space to their children so seem to have been fully content. As a retired couple we are at pains to be as good landlords as possible and even bought the freehold of the building with the other leaseholders to be able to ensure the block was properly maintained. A high proportion of our rent receipts have been ploughed back into the flat, which is kept to a high standard of maintenance. We cannot see how the proposed licence conditions have any advantage for our tenant. The only difference the licence would have made to our current tenant if it had been in operation when she moved in is that she would have been expressly directed to use the municipal waste bins in the street and call the Council to arrange the pick up of bulky items - and as the RLA have pointed out, this condition is probably illegal. Anyway, our current tenant who is a responsible adult who lived round the corner knows this well! The licence will be a burden to us as landlords and the cost will be an additional upwards pressure on the rent our current tenant pays - very unwelcome for her as she is saving to buy a property. Please do not proceed with this scheme as it may tempt us to give up letting - a most unwelcome unlooked for consequence of any licensing scheme if the PRS shrinks in Brighton with the loss of better properties as we would have no problem selling for residential use. As I have commented above, if there are bad landlords you need to tackle them directly by contacting their tenants and not imposing this cumbersome and expensive licensing scheme on hardworking and responsible landlords like us.
- We feel this is another scheme designed to make it difficult and expensive for landlords to rent in Brighton and Hove. We take great pride in providing our tenants with good quality housing at a fair price. We are not greedy money grabbing people - just a normal couple who work full time and are trying to invest for our retirement. We are being penalised in taxation, in buy to let mortgages, and have little protection from unscrupulous tenants who don't care for our properties, and In some instance's wreck the flat - and steal from us. Where is the protection for us? You do need to ensure that tenants have high quality housing - but why penalise us all for the bad behaviour of a few? If we meet these standards and let through agents - we should not be subject to more charges. We will have to pass these costs onto our tenants - and they can ill afford it. Please start valuing your landlords; most of us are providing a great service.
- ❖ No comments

Living in other areas of the city or outside of the city

- As said, it's a sledgehammer to crack a nut. Targeting rogue landlord would be a far better use of

resources. E.g. deposits, a scheme to regulate a problem that was found to hardly exist. This is similar.

- Don't do it!!
- From some of the points raised, namely the upkeep of a property pertaining to waste at a property and rodent infestation. There is an automatic assumption that this is the responsibility of the landlord whereas this can be as much due to the actions of poor hygiene of the tenant. Surely the tenant must have some responsibility for their own actions and perhaps they too should be required to pay for a licence to be able to rent. After all any charge that is incurred by landlord is likely to be passed on to the tenant by increased rent charges and an additional loading for the additional commission charges collected by the letting agents based on the rental charge.
- I am a landlord in the town with seven properties that are fully licensed under the small HMO November 2012 regulations. I also manage a flat that currently does not form part of the HMO standards. - In general I support the roll out of licensing to all let properties in the City, implemented correctly it would push up standards. The standards need to be applied equally to all properties including University managed houses, Housing associations, Charity accommodation, etc. - The council cannot ignore the Airbnb problem, currently Airbnb is a way round licensing and planning restrictions. Some Airbnb properties in the town are causing residents considerable distress with their loud music and parties. Properties let for more, than perhaps a month a year need to be licensed. - The councillors need to realise that the costs a landlord faces in implementing licensing will ultimately be passed onto the tenant. The councillors need to be able to justify the license fee to the constituents / tenants in their wards. - I must question how the housing team is going to manage City wide licensing, with potentially 27,000 properties to be licensed, the team has struggled with the 2,700 properties in the five wards that were licensed in November 2012. - The existing HMO standards are sufficient and my view is that there is little to be gained from changing the existing standard, again I question if the housing team has the resources to revisit every small HMO property that already has a full license. - The disappointment is that with the council's presentation in December 2016 there were still roughly 20% of the 2,700 small HMO properties still to be issued with a full license. Now this is after four years, the housing team need to make greater effort to enforce the standards, visit the properties or relax the regulations. - Reduce the price for those of us that have small HMOs that already meet the full standards and we have a full HMO license. Over £600 per property for a property that already meets the standard is excessive. - Vital that article 4 planning remains in place in the affected city wards, otherwise we will be swamped with HMO houses. - Housing team need to limit rooms in the roof or ill thought through extensions for HMO student properties. Trying to jam 6 students into a house designed for 3 or 4 makes for sub standard living accommodation. - Enforcing minimum room sizes in all properties will reduce the rental housing stock in an already crowded and expensive city. - By implementing a city wide licensing the council are playing into the hands of the developers building literally thousands of new purpose built student rooms, although of a high standard these bedrooms at often £250 a week are beyond the means of most students. - Licensing is sold to the electorate on the basis of improving anti social behaviour, the landlord has few powers short of eviction to prevent anti social behaviour. If a landlord evicts a tenant for anti social behaviour that tenant will invariably, due to his poor history have to be housed by the council. - I would like to see some evidence that poor landlords have been prosecuted or that really poor properties have been brought up to a higher standard, there are no figures in the consultant reports. - As landlords we operate in a free market, tenants have an option to choose the property that best suites their needs, their price, location and standard. Property to the East or West of Brighton falls in price dramatically. - The government is talking about bringing in licensing on a country wide basis. In Brighton and Hove we should ensure that we meet possible forthcoming UK standards and not just implement a local standard. - The inspectors in 2012 visiting HMO were variable. Landlords often felt that it

was a gamble as to which inspector they got, there needs to be more consistency in training plus an easy to use arbitration process. This would be just as true for selective licensing.

- I am absolutely fed up with increased demands on landlords - no periods of freedom from council tax between tenants - S24 taxation - increase stamp duty - changes to capital gains - and this 'licencing' to allow local councils to make more money.
- I rather fear that the scheme introduces a layer of control which would have little benefit for the majority of tenants and would lead to increased rents in many cases. There is a risk that it would lead to a decrease in available rental properties at a time when more are needed.
- I think you get the gist of what I think about this ridiculous scheme.....I won't pay it.....the tenants will in increased rent!
- I think where there are issues it should be brought in. If no issues and tenants are happy why bring it in. I do not want to police my tenants who I have a good relationship with. I have tried this in the past with a tenants neighbour unsuccessfully
- I would require better reasons from the council before I would consider the Selective scheme anything other than a money making exercise. The council should also reflect on what will happen if small private landlords finally get fed up with increased regulation and taxes and decide to remove their properties from the PRS. This proposed scheme is really just another tax on private landlords. I would like to think that my comments will be read and understood but I don't hold out much hope as it appears that PRS landlord bashing is very much in fashion at present.
- I would suggest it is illegal when additional licensing was introduced it was for 5 years with no replacement. The whole scheme appears to be a paper pushing exercise only dealing with issue she required by law anyway it is achieving nothing
- It seems to be financially penalising good landlords, which I feel is unjustified and unfair. There are already increased costs with being a landlord with tax changes and stamp duty charges and this is one more cost. Ultimately it will be passed onto the tenants to pay which means rents in the city will inevitably go up - pricing people out to the city boundary
- My chief concern with the scheme is that it will increase the cost of living for many in what is already one of the most expensive cities in the UK to rent a property. While some landlords may be able to absorb the licence fee into their costs, not all of them can and one consequence of the scheme is that it will deter landlords from making new purchases in the affected areas, which already have very high house prices and low rental yields. This restriction of supply in the private rented sector is going to lead to increased rents, with keyworkers being priced out of the city. The scheme has limited ability to improve standards but will sadly lead to higher rents for all.
- My properties currently make a loss as I spend a lot on maintenance of Victorian housing stock. Additional costs may make continued renting unviable. Brighton and Hove is a city that needs rented accommodation due to large transient population. Could the council consider what help it could provide in updating old housing for the 21st century. Thanks
- Needs to cover everywhere, not just a selective area, this will ensure fairness for landlords and tenants, and will stop tenants buying up cheaper properties on the outskirts, and the renting sub standard accommodation
- New tax changes will force landlords to quit the market and send rents rocketing, an MP has been warned. Changes to mortgage interest relief, which will see landlords taxed on turnover rather than profit, has been phased in from April 2017 forcing some landlords to sell up and pushing rents up rents for tenants by up to 30%. MP Dame Rosie Winterton visited Doncaster estate and letting agent Galley Properties, where director Teresa Galley and RLA vice chair Chris Town outlined the problems facing the private rented sector and what the government should do to help. Ms Galley invited Dame Rosie to the business to talk about the changes she is already seeing on the ground as a result of the tax grab “ and her fears for the future of the private rented sector. She said many landlords are already selling up, with overseas investors snapping

up the properties. According to Ms Galley these new landlords are reluctant to improve these homes, lowering standards across the board. Some homes are removed from the rental market altogether affecting supply. She said: as an estate agent we are seeing numerous landlords wanting to sell up. These are landlords with decades of experience with many tenancies lasting years and some with large portfolios. These are the very professionals that the country should be encouraging to expand but instead they are being punitively taxed and worrying about bankruptcy. The homes they are selling are often being bought up by foreign investors. the loss of a large proportion of good local landlords that take pride in and invest in their local communities can only lead to further social decay in more and more of Doncaster's suburbs. The number of people investing in the buy-to-let sector is falling at an alarming rate, while many existing landlords are selling their properties ahead of changes to mortgage interest relief, according to a senior letting agent. But with mortgage tax relief set to be phased out from April 2017 and now that the Bank of England's Financial Policy Committee has been granted greater powers over the buy-to-let market, making it harder for many property investors to get a mortgage due to new tougher mortgage affordability tests, activity levels in the sector is slowing dramatically, according to Sacha Moussaieff, director at Milton Stone. The central London agent commented: in my twenty years of agency the demand for buy-to-let property has never been so low and landlords have been driven out of the market. He also pointed out that the extra 3% stamp duty on top of additional taxes means that becoming a landlord is extremely unappealing. Moussaieff added that he fully expects to see rents rise to combat the new tax laws on rental income. Independent research carried out by AXA reveals over 40% of Landlords asked think they will be worse off after Section 24 mortgage interest relief reductions. This compares to the standard government and treasury policy script quoting only 1 in 5 landlords will be affected by the tax changes made in the Summer Budget 2015 and now coming into force. Almost half of private landlords have told AXA they are now looking to withdraw from the residential lettings sector by 2020. 21% plan to sell all their rental properties 10% are looking to reduce the number of properties in their portfolio 7% want to switch to safer commercial property ownership 8% will transfer ownership of rental property to their spouse or another family member who is in a lower tax bracket to try and stay under the section 24 penalty of being a high rate tax payer. Two in three landlords also report feeling scapegoated for the housing crisis and stigmatised by government, politicians and sections of the public for providing homes to rent. One landlord said, It's a myth that we are rich. After mortgage, tax and repairs, I don't make a profit on the two properties I own. People think landlords are fat cats who sit back and do nothing for their tenants. Head of Marketing for AXA Insurance, Gordon Rutherford said; landlords have been subject to one piece of new legislation after another in recent years, much of it very complex indeed. We see a real confusion as to what the new tax changes will mean, with government and landlords giving very different estimates of the impact. We need to remember that few landlords are professional property tycoons. Two thirds in the UK are accidental landlords. They tend to own just one rental property that they've inherited or are finding hard to sell, and they make a modest income once time and expenses are out. They do feel increasingly apprehensive, as we can see from the numbers thinking of withdrawing their properties from the rental market in the coming years. What is interesting is that the Council of Mortgage Lenders and our own experience (managing nearly 50,000 houses), show that new BTL purchases are down around 50% year on year since the second home stamp duty levy was introduced. More landlords are selling than buying, reducing the net private rental supply for the first time in decades. This will accelerate as Section 24 takes hold over the next 5 years. The governments decision to strip buy-to-let landlords of mortgage interest tax relief is expected to result in rent increases for tenants of up to 30%, as landlords, faced with significantly higher costs, are left with little alternative but to pass on at least some of the pain to tenants, according to the Residential Landlords Association (RLA). The organisation argues that the tax changes will stifle investment in the buy-to-let sector, causing a potential reduction in available rented

housing stock, as many prospective buy-to-let investors are deterred from investing in the sector while some existing landlords opt to exit the market, adding to the current supply-demand imbalance, which would also place upward pressure on rents. As the government begins to restrict mortgage interest relief for landlords and tax their turnover rather than their profit, a survey by the landlord body has shown that two-thirds of member landlords feel they will need to increase rents to cope with the new tax burden. The study also shows that 58% of members plan on cutting back investment in property. The RLA yesterday highlighted the fact that some independent experts, such as former Bank of England economist David Miles, have calculated that together with the higher stamp duty, rents would have to increase by up to 30% to enable landlords to meet their higher costs. Alan Ward, chairman of the RLA, said: today's tax increases contradict everything the government has said about needing a larger rented sector to give tenants more choice and more affordable housing. It is tenants who will be hit hardest by these punitive tax increases. Aside from likely paying more in rent, in many places they will face a growing shortage of affordable places to rent. We call on Ministers to undertake a major review of the impact of this policy and if all the predictions about its impact are right, to abolish the changes in the autumn budget.

Liverpool City Council (LCC) has issued just 2% of licensing applications (This was according to Landlord Today in February 2016) since launching its citywide landlord licensing scheme in April 2015, according to information released by the council following a Freedom of Information request (FOI) from the National Landlords Association (NLA). The news comes as the council recently announced its co-regulation partners to administer the scheme. The scheme, which is compulsory for all private landlords in Liverpool, was introduced to ensure a level of quality assurance and proper practice among landlords in the city. In order to be granted licences, landlords have to declare convictions and their properties must meet fire, electric and gas safety standards and be in a good state of repair. The licence costs £400 for a first property and £350 for every additional property. Landlords who are members of the city's accreditation scheme class or members of the Council's co-regulation partner organisations receive a 50% discount for licensing, so £200 for a licence. Carolyn Uphill, chairman of the NLA, said: these findings show that Liverpool City Council can't cope with this scheme, which is precisely what we said would happen when they proposed it almost two years ago. Quite frankly it's embarrassing. If the council can't process applications or inspect properties, then how can it improve property standards for tenants? At this rate, it will take 13 years to inspect the City's private rented housing, and 38 years to license them all, so the scheme's co-regulation partners have got their work cut out. A growing number of buy-to-let landlords are planning to sell-off their properties as the government's punitive new tax changes cause investors to quit the market, new research shows. The pending removal of landlords' mortgage interest tax relief from next month, coupled with the 3% surcharge on stamp duty introduced last year, is deterring many buy-to-let investors, according to the National Landlord Association (NLA). The fact that the government is using landlords as scapegoats for problems faced by first-time buyers by tightening buy-to-let taxes has seen the proportion of landlords looking to sell in the next 12 months more than double since July 2015, from 7% to 16%, which would drastically reduce the supply of much needed private rented homes, the study by the NLA has revealed. As well as selling up their existing properties, 84% of buy-to-let landlords now say they are no longer looking to add to their property portfolios. Consequently, the NLA predict that there will be a net reduction in property transactions by 2018, adding to the supply-demand imbalance in the market, which is likely to drive rents up. Richard Lambert, chief executive at the NLA, said: there has been a clear correlation over the past year between our findings on what landlords have told us they intend to do in terms of buying and selling in the coming year and their actual transaction activity. If the trends keep moving in the same direction, then by 2018 we'll have more experienced landlords selling than buying, contributing to a net reduction of private rented properties.

Interest in buy-to-let has been decimated over the last twelve months thanks to a stamp duty hike and tax penalties that came in last April, data revealed today 17.05.2017. The

amount lent for landlord property purchases plunged by nearly 80% between March 2016 - when there was a lending spike as property investors rushed to beat the new tax regime - and March this year. And the number of loans agreed fell by half. In its monthly report the Council of Mortgage Lenders revealed that a total of £900 million was handed out in buy-to-let loans for house purchases in March: a 79.5 per cent decrease compared with March 2016, when £4.4billion-worth of landlord loans were advanced. Meanwhile, just 71,100 loans were taken out this March 2017 compared to in the year since the tax change, compared to 142,100 loans 12 months earlier. Since April last year, those buying a buy-to-let home or a second property have been slapped with a 3 per cent stamp duty surcharge. Landlords also now pay more income tax on their BTL earnings and get less tax relief from interest paid on their BTL mortgages. This led to a significant spike in mortgage lending for house purchases in the buy-to-let sector in March 2016, before the changes kicked in on 1 April. In autumn 2015 the Department for Communities and Local Government announced £5 million of funding for councils to tackle rogue landlords. The Housing and Planning Bill 2015 contains measures to tackle rogue landlords. This includes banning orders, penalty fines, stronger checks for HMO landlords and an extension of the use of rent repayment orders to conditions cases. Landlords have been hit with numerous additional financial costs and regulations such as loss of 40% mortgage interest relief, additional 3 % stamp duty, loss of 10% wear and tear allowance, more stringent mortgage controls, potential loss of letting agents fees that agents will try and recoup from landlords, fixed wiring tests due to come in 2017, and the list goes on over the last 12-18 months and this could be the last straw that a number of landlords may decide to sell up. This will cause a greater shortage of properties to let in Brighton which already has the second highest figures for homelessness outside London. Do the council want increased tenants to be put up in B&B or cheap hotels which is all that will be available which is happening in Peterborough and around the country. I urge you to think again and work with local landlords, letting agents and landlord associations and not go down the selective licensing route which will be unlikely to solve any rogue landlord / tenant problems you may have.

- No one wants rogue landlords or unfit properties, but it seems that this is another way to hammer private landlords. Small landlords like myself really can't afford any more outgoings; we can claim less and less of our costs back year by year and every year more regulation come in that cost money. For me and many like me, it's soon going to have to be a choice of selling or raising rents. You should do more of a consultation with tenants of private landlords and get a more balanced view. I also feel that this scheme will be hard on those that play by the rules and those that don't will get away with it in the main.
- Perhaps the council would inspect all private rental properties and insist on a licence from Brighton Council if they do not conform to required standards. I don't see why private landlords should be penalised if they provide homes of a good standard.
- Please ensure you consult with national landlord groups NLA, RLA etc. who will be able to give balanced feedback about other licensing schemes around the country. Unless of course - like parking - this is just going to be treated as another cash cow.
- Re-think this crazy scheme, it does not deliver the benefits you are looking for! Work with the landlords in the City as well as the Universities to come up with a proper and workable solution that actually has the opportunity to deliver benefits. Making housing even more unaffordable in the city and continuing to fuel the fires of negativity, aggression and abuse towards landlords in the city is totally unnecessary.
- The entire cost of this will be passed to my tenants. All additional costs will also be passed to them: electrical safety, frequent inspections time cost etc. In fact, I will put it in their contract that they are responsible for these costs in the same way that they pay their council tax. After all, this licence will improve their living conditions and it is only right and proper that they should pay for their living conditions to improve.
- The fee is much too high. I have property in Hastings where the fee for NLA accredited landlords

was reduced to £150 after the consultation. By law it should only be enough to cover the admin costs of the scheme. There is a risk that a higher cost will result in rent rises and rents are high enough already.

- The justification for a comprehensive scheme (by ward or City-wide) is weak. The Council seems to be aware of this and be seeking ways to minimise the opportunity for scrutiny by the Secretary of State either of this proposal or of any proposed subsequent extension City-wide, which I suspect is the longer-term goal. It is unfair and improper to load the financial and administrative burden of a scheme to deal with rogue landlords on all landlords. A better targeted scheme might, for example, focus on those risk factors which are used as part of the analysis to justify the proposal that is RCAs and housing benefit claimants. I can see that this may be more difficult administratively difficult, it would be better justified.
- The proposed scheme paints Brighton & Hove as a den of iniquity. Municipal Brighton & Hove housing estates are the place where I would dread to walk alone at night. And private sector landlords actually have higher approval ratings from tenants than does the council itself. While private sector housing officers have much improved in the last 10 years “ an explosion of this service, according to Parkinson’s Law principles, on a gigantic scale seems un-costed and ludicrous. There are huge holes in council’s services such as decent planning advice (now not available), home care for the elderly, nursing home and decent prompt medical provision plus conservation area multiple disgraces. These should be given priority instead.
- The scheme doesn't directly affect me as my only rental property in the city is in North Portslade. But I think it would make renting more expensive for tenants so I would benefit from receiving more in rent! But I'm concerned that people who are guilty of anti-social behaviour would move to areas like North Portslade, or Shoreham where I live, or Woodingdean where I have relatives. Instead of dealing with issues like this the council is just shifting them around.
- The scheme is far too expensive – This will push up the cost of renting as the cost will be passed on to tenants. You need a much more slimmed-down approach which is less expensive to administer.
- The whole premise of this scheme is that private landlords are bad landlords and fail to take care of their tenants or their properties. I appreciate that there are some bad landlords, but they should be dealt with individually. I have always tried to keep my property in good condition. This scheme is just a way to punish private landlords for being private landlords. If you got rid of all private landlords there would be many more homeless people. As for ASB, there seems to be no link between this and punishing private landlords with an expensive licencing scheme. There is just no such link established in your proposals. There is very little information of the role of managing agents in these proposals. I live 5000 miles away from the UK. Clearly I need to use a managing agent. You would have to deal with them on a day to day basis if the scheme went ahead. How would they be involved in the scheme? To summarise I think this is an ill thought out, expensive scheme which will not meet any objectives other than punishing the private rented sector.
- There appears to be one cost for all, from a one bed flat to a family house. Is this fair? Should cost reflect type of property/rental income etc.
- This is an enormous undertaking that will be very costly to landlords. I think you should start with at most 2 wards. After a year the results should be analysed to see if the costs are justified by the improvements made and whether they could have been achieved by less costly methods.
- This is being pushed through in the absence of any proper evidence that it is required and on a biased reading of the facts that suits the Council's political views and is a scandal which will penalise landlords and then tenants with the only result being greater employment in the Council offices. Let us hope this can be stopped.
- This scheme would benefit tenants and Brighton and Hove council alike, whilst also giving landlords the assurance that they are all participating on a level playing field.
- Totally over priced

- Unnecessary extra layer of bureaucracy.
- We do need to raise standards but don't make it prohibitive for small landlords who often perform the best or you will drive in more agents and big landlords
- We own 3 properties with current HMO licences and think it should be a city wide scheme as there are still properties and landlord management which is below the standards we have to maintain. It is only right and morally proper that landlords should provide good accommodation for their tenants
- We strongly object to the imposition of this scheme and additional costs, which will ultimately be on-charged to tenants.
- When I found out about this proposed licence scheme for the city I wrote to the council etc. about it but I did not receive any information on consultation portal. I've also spoken to my letting agent and they didn't know anything about it. It's almost as if the council is trying to keep it quiet and push it through anyway. As I said it was already in their manifesto of implementing a licensing scheme, so it's in their interests to make it happen. When the labour party mentioned about having a licence for landlords as part of their election manifesto the Tory Housing minister Gavin Barwell said the licensing scheme amounted to a "tenants' tax" which would lead to landlords pushing up rents to meet the cost. If the current national housing minister can see this, they why is the council pushing ahead with it. I can guarantee that I'll be putting the cost of this onto my tenants, which is such a shame as they shouldn't be punished for this awful scheme which isn't going to do any good. I will have no choice but to do this, following on from the government's implementation of higher stamp duty for landlords, scrapping of interest rate tax relief, banning of letting agents fee and higher capital gains tax for landlords. What choice do we have. It would be nice if the council could support landlords in Brighton & Hove, who supply the majority of the housing as there is not enough social housing provided.
- Won't this scheme clash with proposed government legislation? If so what is the point?

Local business

Living in the 12 wards

- No comments
- ❖ A complete no brainer, needed and will work.
- ❖ A no brainer. Everyone in the City will support this.
- ❖ Bring it on x 2
- ❖ Excellent proposal from BHCC that we fully support.
- ❖ Fully support proposals
- ❖ Fully support the proposed scheme x 3
- ❖ Fully support the proposed scheme. Overdue. Fair. Will make a difference.
- ❖ Fully support these BHCC proposals.
- ❖ Hope this tidies up those landlords and tenants who do not play by the rules and/or cause problems for our community.
- ❖ I support the scheme
- ❖ Strongly agree with the proposals. Bring it on.
- ❖ Strongly support these excellent proposals.
- ❖ Strongly support these proposals that are fair, will suit both parties, support the rented sector and the whole community.
- ❖ Support. Completed interview due to the persistence shown by my interviewer about the need for feedback.
- ❖ Thanks for the visit from your interviewer. Good scheme. Support.
- ❖ The proposals are all good and will help our community
- ❖ We have to do more to help the rented sector and these proposals go some way towards that. The homeless situation shames our City.
- ❖ We need to try harder. BHCC proposals like this encourage us. Fully support.

- ❖ Works in other parts of the City and will here too. Fully support.

Living in other areas of the city or outside of the city

- No comments

Other

Living in the 12 wards

- The HMO licensing register needs to have more contact details for the landlords/agents - a telephone number or email is essential. Landlords should not be able to only offer postal address. Communities need to be able to contact landlords/agents in a more immediate way.

Living in other areas of the city or outside of the city

- Anything which makes the system more transparent and which exposes bad landlords has to be good for the health of the tenants and community as a whole.
- If you allow planning clauses into the licencing process the landlords will exploit the loophole and make all kinds of unintended proposals and await the declines before making new ones to frustrate the payment requirements.
- It would be a first step in regulating unscrupulous landlords.
- Please note that as we are a specialist food rather than a housing organisation, we are not able to answer the questions in detail. If you would like more information about our response or about the city's food poverty action plan please contact Brighton & Hove Food Partnership

Not stated

Living in the 12 wards

- No comments

Living in other areas of the city or outside of the city

- All a total waste of time, money and effort. Needless Red Tape. Spend Tax Payers money on something more useful like Hospitals
- There was mention of a landlords register. Are landlords' details going to be publicly available? We have been told a number of times by letting agents that we are among their best landlords but there are a lot of people out there who seem to have it in for landlords and lump us all together. Will we be able to give the letting agents address for the register or will we have to give our home address? We have a young child and am concerned that people might use the register to target landlords
- Too much bureaucracy costing low-income tenants too much money. BHCC needs to concentrate on enforcing national

Responses to the consultation by email and letter

Respondent

I believe that an inordinate amount of effort is spent controlling competent landlords whose tenants are mostly happy with conditions. Vigorous legislation and subsequent powers to deal with poor landlords, poor tenants and poor premises would be better targeted, cheaper and more to the point.

Respondent

- I do not believe there is any proven link between HMO licencing and improvement in private rented property in Brighton or anywhere else
- HMO licencing is merely a council fund raising exercise
- The council is fully aware of bad properties in the city that need action and it has all the powers required to enforce current legislation
- HMO licencing discourages supply and therefore raises rents
- Further the councils own properties are frequently sub standard as exemplified for example by

- council houses, Grenfell Towers and the West Pier
- There should be no further HMO licencing unless you can prove it works better than the current arrangements

Respondent

I am writing to express my concern regarding the proposed licensing which would dramatically and, I believe, unnecessarily affect Brighton landlords.

While I appreciate the main grounds for the licensing -

a) Poor quality of housing, overcrowding etc.; and

b) Anti Social Behaviour (ASB),

I struggle to see why this additional measure is required.

The Council already has existing powers to issue –

- improvement notices for properties which do not meet Decent Homes Standard
- litter abatement notices,
- noise fixed penalty notices or confiscation of equipment
- disposal of waste directions
- notices to remove rubbish

Furthermore, the proposed licensing doesn't include Airbnb or Short term Holiday Lets, people are only here a short time and have little concern for neighbours knowing that they will have gone again after a few days.

While the council is only supposed to charge the fees involved, it is estimated that the licensing will generate £20m over 5 years. I wonder whether there may be additional interests for the licensing other than the reasons listed. I thank you for taking my concerns on board.

Respondent

I would like to report our objection about the new licensing with a fee between 460-720 Pounds.

- The cost of the licensing will need to be passed on the tenant in some form.
- The effect will be to cause general rent across the city to rise making the city less attractive for living.
- The licensing is meant to address rogue landlords who allow overcrowding and subletting. The Council does not have the recourses to re-house tenants in overcrowded or unsuitable accommodation.
- The licensing will give the council powers to force landlords to sort out problems of noisy, disruptive or problems tenants. The easiest way is for landlord to issue a section 21 notice to evict the tenant, who then has to be re-housed. This will result in increased homelessness in the city. Landlords do not have the powers to police tenant behaviour.

Respondent

I register the objection to introduce Selective Licensing on rented properties as the effect will be to cause general rents across the city to rise making the city less attractive for living in and for doing business

Respondent

I strongly object to this scheme, the way it would be implemented with 6 monthly inspections, the fact that it ignores and undermines basic fundamental tenant rights and the justification used for this intrusive regime which is biased and limited.

Why should all private tenants be subject to this regime?

Tenants have their own rights.

Tenants have their own absolute rights.

I'm not sure on what basis you assume the right to interfere in tenants' rights, tenants rights to live in their homes.

Why should all private tenants be subject to this intrusive regime with 6 monthly inspections and other random inspections?

Why should all private tenants be subject to this unjustified regime, as if they have done something wrong or there is something wrong?

Why should all private tenants be subject to this unjustified intrusive regime as if they are anti-social/criminals?

The scheme is all about the Landlords with 6 monthly and unspecified random inspections within life of licence, no consideration of tenant whatsoever in all this, their circumstances and how it affects the tenant.

This scheme is overbearing and onerous.

What about tenant rights, you have not considered this?

What about tenant rights to live peacefully in their own homes?

Why should tenants be treated like this as possible/potential anti-social criminals, subject to continuous and random unjustified inspection?

The scheme is all done through the Landlords, so you effectively undermine Tenant rights.

The costs of all this, implementing this licensing scheme, implementing housing changes, can be passed directly onto the tenant.

This will lead to rent increases for those that can least afford, making rents and housing in Brighton even more impossible and unaffordable than they already are.

If there is a problem, any problem at all, the tenant can simply be evicted.

You don't address tenant rights, high housing costs, housing shortage and that all costs can be passed onto the tenant.

You cannot justify this scheme on direct housing issues so have used the trumped-up indirect issue of Anti-Social behaviour effectively labelling all private tenants as potentially anti-social, potential criminals, future criminals, who need to be checked-up on and inspected.

The proposal has completely failed to justify that the scheme needs to be introduced across the city in 12 wards.

There is no justification for this whatsoever.

The Selective Licensing Scheme seems to be a cut and paste job of the 'Additional Licensing Scheme for HMOs', almost exactly the same word for word, without further justification on why licensing needs be extended to all privately rented homes.

I am sure this scheme will not affect you and you would not tolerate this regime yourself.

This proposal is a shocking outrageous disgraceful abuse of power.

Please reject the 'Selective Licensing Scheme'.

Home owner

I am a home owner in the city where the neighbouring property is being let as student accommodation.

There is extensive building works at the property which is rumoured will increase the student numbers living there and it is hideous example of residential housing turned into densely packed student housing.

There is ongoing noise and antisocial behaviour from the students living in this house with late-night parties, yelling and fights in the street, police visits, etc., not to mention the state of the house itself

The situation has negatively affected my family and home.

Please, can you put forward legislation which will:

1. make landlords responsible for the well-being of young people in their accommodation (young being 18-23) as cognitive research identifies this age group as vulnerable, needing trustworthy authorities in their private lives.
2. allows neighbours of terraced, student lets to have a say on whether or not the houses can be gutted, restructured, and visibly ruined (e.g. a dividing wall in the front window) to increase the number of students.
3. makes it the landlords responsibility to provide the neighbours of their students lets information about who owns student housing and who to contact when there's anti-social behaviour; makes landlords responsible for any damage the students cause to their neighbours' lives.
4. make it a legal requirement to install sound proofing between terraced homes where one of them is a student let.
5. give the neighbours of student lets a priority to decide whether or not they want to sell their house as an HMO even if it exceeds the ratio of lets/homes in a neighbourhood -- (I'm stuck! How else can I get out of the hell that has allowed my neighbourhood to turn into for my family?)

Landlord x 2 from same London company

1st response: I write this note as a very concerned landlord in Brighton and Hove. I own two rental properties in the city, both of which are let to tenants who have had difficulties getting housing in the private sector due to their financial income and one due to a disability which has put landlords off accepting them elsewhere. They are also unable to get support from the local authority.

These new, financially penalising proposals, are simply further red tape for landlords to go through, and along with the Chancellor's stamp duty and income tax changes, will further dampen the property market in the city, as well as leaving landlords no option but to pass on the costs to their tenants.

The powers the council already has are plenty strong enough, including:

- Improvement notices for properties which do not meet Decent Homes Standard
- Litter abatement notices,
- Noise fixed penalty notices or confiscation of equipment
- Disposal of waste directions
- Notices to remove rubbish

All of the above I support as a responsible landlord, but am disappointed by the new proposals as it is to further detriment to our city. The private rental sector is integral to the success of the city, and the proposed plans will simply cause a further rise in rents, making Brighton and Hove less affordable and poorer for it. As an active member of the RICS, I will be forwarding this message with my strong disapproval to them as well for discussion

I look forward to hearing from you, and hope to see an overhaul of the plans very soon.

2nd response: I write this note as a concerned landlord in Brighton and Hove. These new, financially penalising proposals, are simply further red tape for landlords to go through, and along with the Chancellor's stamp duty and income tax changes, will further dampen the property market in the city, as well as leaving landlords no option but to pass on the costs to their tenants.

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I look forward to hearing from you, and hope to see an overhaul of the plans very soon.

Landlord

Selective Licensing

As a landlord of 11 properties in Brighton, I wish to object against the selective licensing for the following reasons:

1. The cost of licensing will and must be passed on to the tenants. This has been shown to be the case in other towns and cities
2. The effect will be to cause general rents across the city to rise making it less attractive for living in and for business.
3. The cost to the council of Housing Benefit will therefore rise.
4. The licensing is intended to address landlords who allow overcrowding and subletting. When these tenants are evicted does the council have the recourses to re-house these tenants?
5. The licensing will give the council powers to force landlords to sort out problem tenants. The easiest way will be to issue a section 21 notice to evict the tenant, who then has to be re-housed. This will result in more homelessness.
6. The tenant will be the looser as has been shown elsewhere.

Please ensure this objection is recorded

Landlord

I am a landlord of one flat which I have buy to let mortgage on and hope that one day it will act as my pension. I also work in a letting agency.

Your proposed licensing for all properties in Brighton is a waste of your time and resources and puts tenants at risk of even higher rents and fewer properties to choose from.

Licensing for large HMOs is welcome, as often houses are chopped up to make more bedrooms and pack people in. These need to be regulated to protect standards for tenants. This does not need to be done to smaller flats where there is not an overcrowding issue. Imposing more regulation and increasing costs to landlords, mostly like myself, who look after their investment and take good care of maintenance, will only increase rents to tenants which are already too inflated. Some landlords will have to sell, so the housing stock for rentals will shrink only making more problems to the tenants you want to help.

The council already has existing powers to address some of what you say are concerns:

- improvement notices for properties which do not meet Decent Homes Standard
- litter abatement notices,
- noise fixed penalty notices or confiscation of equipment
- disposal of waste directions
- notices to remove rubbish

The proposals do not include Airbnb or Short term Holiday Lets which cause untold grief to neighbours with unruly Hen and Stag parties. These people are only here a short time and have little concern for neighbours knowing that they will have gone again after a few days.

Licensing will increase the costs to tenants at a time when landlords are already feeling the pinch from reduced mortgage interest relief, increased stamp duty, loss of wear and tear allowance, and shortly the abolition of Tenancy fees by Letting Agents – all of which WILL increase rents.

I urge you not to enforce anymore additional licensing. You are barking up the wrong tree. More affordable housing needs to be built and you should be focussing on that to provide long term stable housing for residents in Brighton. I hope you will listen to these concerns.

Landlord

SELECTIVE LICENSING SCHEME CONSULTATION

– detailed response from a Brighton 'Build-to-Let' landlord

Introduction

Though genuine HMO licensing has been helpful - the current proposals represent administrative overkill, strangulation of new Development initiatives by red tape, and unwarranted invasion into personal liberties and privacy rights on a monstrous scale. Reductions of private housing provision are likely to occur due to bureaucratic disincentives making marginal projects unaffordable – with extra costs on remaining lettings passed on to tenants in inevitable higher rents.

Surely therefore **untimely, costly, unnecessary and counter-productive!**

General Dangers

Given the current scale of acute Housing shortage in the City it would seem truly untimely to engage in a new bureaucracy which would -

- (i) multiply the number of homes inspected to 28000;
- (ii) cause new Inspections for c50000+ City residents and 20000+ landlords and ltd-companies;
- (iii) necessitate cascading new work – and escalating responsibilities – into the future for an already overstretched Council – and already-over-taxed landlords;
- (iv) increase unexpected costs to Social Services and other Council departments (e.g. legal, social. Planning, pensions, staffing accommodation, Private Sector Housing etc.) – all at a time when the Council is failing to meet many of its **existing** statutory requirements.

Inadequate Resources

Enquiry to Public Sector Housing by phone suggests that it is not at all evident **which** Council Department could train, provide, sustain and pension this Additional Inspectorate – which could perhaps increase the PSH Dept tenfold! No figures seem available. And can this prospect be desirable against all the other competing priorities?

Total Costings (The Economic Case)

These have not been provided to the public (even though amounting to a possible £15m pa). And yet cost projections are surely an essential fact to be weighed and pondered within any period of 'public consultation'. **Even if** these Costs are to be mostly passed on to Others in the first instance (i.e. landlords) – can we be sure that there are no **unforeseen costs** to the Council – now or in the future/- And if landlords are hit with unexpected Costs these will inevitably lead to **higher rents** and abandoned property-improvement projects (which depend on cash flow).

Legal Basis for Selective Licensing?

To date no **convincing** legal reason has been given for introducing this Scheme to 28000 homes. The

legal 'grounds' do not seem to tally with our City. And our Councillors – so I understand – would be required to justify that our City is in a **very parlous state indeed!**

Root Causes

(a) Is Brighton and Hove truly an **anti-social-behaviour basket-case**?

(b) Have the subtleties of Real Housing Need (supply and demand, and **actual** anti-social behaviour) been fairly analysed and quantified? According to the 2015 '**Housing Strategy Document**' – the PRS is consistently the **biggest cause of homelessness**. But surely the **exact opposite** is the case!

(c) The Council has largely abnegated its responsibility to adequately provide Housing for the Homeless, the Young and the Vulnerable (i.e. those most in need, with the exception of the sick and elderly). Having itself retreated from Investment to house the 'difficult cases' it is rich indeed to blame the PRS (as the last-man-standing addressing this need).

(d) Without the PRS Homelessness would increase colossally. It is also obvious that crime (such as it is) and anti-social behaviour frequently follows the young (and some students). If Government precludes local authorities from accommodating this age group – then the PRS is left to cope. But it is a distortion of the truth to suggest that the PRS disproportionately inculcates anti-social behaviour - which the Housing Strategy paper implies! The PRS is the saviour, not the villain.

Council Reneging on its Responsibilities

Blaming the PRS for under-supply or anti-social behaviour is therefore a category-error.

It is rather the inevitable consequence of how scarce public sector resources are allocated. The Council should – even in these difficult circumstances – look at its **own** inadequacies.

Disincentives

Doubtless the Consultation was conceived with the best intentions.

But there are probable Negatives. Many involve Disincentives:

1 – Disincentive to provision of new units – Since taxation (MIRAS) benefits on developing property have already been scuppered by Government – the Council should surely ask what PRS investor or developer would choose to invest if Selective Licensing were to be introduced?!

The City's properties and land are **already over-priced** – and therefore provide much lower investment returns than comparable towns (Southampton, Eastbourne, etc.)

Further red-tape would be a project-killer.

2 – Accidental landlords put off permanently – Many properties are rented following family breakdown, change of work circumstances or bereavement. But could a 'little old granny' rent out her home for 2 years (or keep it empty?) if she was charged £600 accompanied by threats of prison? Or someone posted Overseas? What heirlooms might be condemned? And what malicious complaints could be made to the Council?!

3 – Reduction of Rooms Available – It seems reasonable and broadly fair that large HMOs should be licensed on safety grounds. However – if this scheme were to be extended to 28000 further homes – (which were not an above-average health risk) then if it were 'successful' – **even on its own terms** – then perhaps approx. 15% of rooms in the City could be condemned (as sub-sized etc.)

Given the current Housing shortage – is this seriously what the Council wants at this time?

Especially when residents of PSH usually report **more satisfaction** than those in social housing!

4 – Freehold/Leasehold Complications and Dangers – Officers will be aware that large numbers of leasehold flats are (usefully) rented out. (Sometimes due to owners abroad). But by denoting these as properties which are 'licensed for business' (i.e. renting income) the Council may precipitate **legal action by Freeholders** against their Leaseholders – resulting in distress, evictions, and possibly properties left vacant. Similarly if some properties are newly-classed as 'licensed' it may cause **some Building Societies to outlaw loans** - or restrict them – due to their various formulas.

Resulting Decrease in Provision, and Ill-Will

My own guess is that the overall result of introducing the proposed Selective Licensing would be a reduction of around **15%** in units to rent in Brighton and Hove.

I believe that the large number of people affected by the intrusion by local government into their homes, with extended bureaucratic schemes of **little discernible benefit**, would create interminable vexatious situations between citizens and the Council.

Council 'Mission-Creep'

Already the Council is colluding with the VOA in raising Council Tax on some HMO bedsits by 500%! In particular – the Revenues Dept is taxing non-self-contained bedsits without wc's or showers **as if they were self-contained flats** on band A. This is both absurd and unethical – the Council is taking away money from some of the poorest in the City under these false grounds. With such malpractices in place – what hope can there be that extended licensing would **not** formalise more injustices?

Negativity – lack of Helpful Initiatives

Absent from the Council's discussion documents are any proposals to help landlords to increase the number of homes available for purchase, development, improvement or to rent.

Example 1 – £550 to speak in person to a Council Planning Officer over new schemes involving Letting (or anything else!). My recent personal experience is that Planning Officers are adamant on this – even if the conversation is only five minutes.

Example 2 – No reduction in licensing fees for members of Landlord Associations. Some other local authorities offer 100% discounts to those belonging to accredited organisations such as Southern Landlords, the NLA or RLA. The Council **say** that they value the PRS, but rarely truly engage with providers and their representatives, and always charge the maximum fees.

Alternative Schemes for Positive Action on Student Housing

A useful and inexpensive tactic which the Council could employ would be to ask the City's Universities etc. to 'call in' (to Admin Offices) **any student reported as misbehaving** or causing anti-social behaviour, or in serious rent arrears. Universities already commonly do this in their **own** halls of residence, and can even postpone allocation of Degrees in serious cases.

The Council could also usefully encourage landlords and agents to always obtain **previous landlord references** – plus Guarantors – on **all** Lettings. And to make referencing a standard practice.

Conclusion

In short – my view is that your Consultation needs much more thought and resource before moving towards any Implementation.

Landlord

I have submitted my survey responses.

In general I am in favour of implementing licensing for properties and landlords across the entire city; my view is that it would drive up standards. However, implementing that roll out, based on the experience of the November 2012 roll out, is going to be problematic and requires much thinking about. I cannot speak for all of the Southern Landlords Association but the majority would support a roll out of licensing.

Landlord

Survey responses submitted via the consultation portal

Additional comments

My feedback on this ill-conceived proposal. How can BHCC treat families as second rate citizens? All Houses throughout the city should be subject to licensing that mandates standards higher than

those for current HMO standards. The relationships among people who live in housing are irrelevant. BHCC/Sussex partnership collaboration should start with the private landlords they purchase some of the most revolting accommodation on offer in this city from. HMO licenses do nothing to guarantee suitable accommodations standards (beyond fire safety and amp) or to diminish housing-associated problems. Thanks for the opportunity to comment

HMO licences are practically meaningless: Some of the worst properties in this city are currently licenced HMOs. Yuk, yuk, yuk.

Southern Landlords Association (SLA)

I write prior to the meeting of the New Homes Committee on Wednesday 14th June 2017.

Our Association, in one form or another, has been representing landlords in the City of Brighton & Hove for approximately 45 years. The purpose of this email is to set out reasons why our Association considers that Selective Licensing in the wards proposed is inappropriate. You will be aware of the six conditions applying to a Selective Licensing designation and that the two allege to be the reason for introducing such a scheme in Brighton & Hove are poor property condition and significant and persistent problems caused by antisocial behaviour.

It is proposed to introduce Selective Licensing in the wards where additional licensing has already been implemented. In some of those wards a very significant number of properties are already licensed under the additional licensing scheme. It follows therefore that the only remaining properties in those wards are either owner occupied or let to families. Brighton & Hove City Council have reported that the licensing of small HMOs in the city has improved both conditions and management and therefore has in effect alleged that antisocial behaviour by tenants living in small HMOs has also improved. It follows therefore that very few additional properties in most of the areas where Selective Licensing is proposed could be identified as properties either with poor conditions or more importantly that antisocial behaviour is taking place. It follows therefore that any survey in those areas is unlikely to be able to identify those properties that are owner occupied, or for that matter rented to families and therefore no assessment could accurately declare that those properties in any one of the areas where there is a multitude of small HMOs is the cause of persistent antisocial behaviour or for that matter poor conditions to justify a scheme that would involve the licensing of all rented properties.

Our Association does not believe that there is justification in introducing indiscriminate Selective Licensing in all wards that are already subject to additional licensing.

An alternative is enforcement. It is self-evident that for a Council to be able to make the case for Selective Licensing, it has to be aware of the six issues, two of which are mentioned above, on which the process has to be justified. Often, some of the issues of concern trigger others in the list so that early targeted action by the Local Authority is needed without the cost and delay of setting up a scheme for a locality. We are not convinced therefore that selective Licensing always answers these matters. Most of the six criteria for licence can be dealt with directly by taking enforcement action against individual landlords, some of whose behaviour extends beyond ignorance and negligence into direct criminality. We hope that these will be employed as a first option, leaving Selective Licensing as a means of last resort.

Impact of licensing fees on the decent landlord

Our main concern is the impact of the licence fee on the decent landlord. The fee effectively subsidises the cost of dealing with the guilty ones. This is because The Housing Act 2004 required

that Selective Licensing Schemes are self-financing. We believe that the choice of Selective Licensing as an alternative too to enforcement needs to be justified because it has the capacity to punish the innocent landlord.

This is especially so in truly selective areas because the smaller and better targeted the area is, the fewer decent landlords are caught in its net and the higher their licence fee will be, as the fixed cost of the scheme will spread across fewer landlords.

The problem of costs impacting on good landlords was recognised in the DCLG consultative response (review of property conditions in the private rented sector) published in 2014.

4.1 a major drawback of licensing is that it impacts on all landlords and places additional burdens on reputable landlords who are already fully compliant with their objectives. This creates additional unnecessary costs for reputable landlords which tend to be passed on to tenants. The majority of landlords provide a good service and the Government does not want to impose unnecessary additional costs on them or tenants who may see their rents rise as landlords' costs rise.

*The issue of costs to decent landlords shines through the message provided by central Government to quote a letter to local authorities from the Housing Minister (11th March 2015) licensing can play an important role when it is strictly focused on discrete areas with specific problems. However, the blanket licensing approach adopted by some local authorities has major drawbacks. This is because it impacts on all landlords and places additional burdens on reputable landlords who are already fully compliant with their obligations, thereby creating additional unnecessary costs for reputable landlords **which are generally passed on to tenants through higher rents**. The vast majority of landlords provide a good service and the Government does not believe it is right to impose unnecessary additional costs on them or their tenants. Such an approach is disproportionate and unfairly penalises good landlords.*

Financial constraints on landlords have significantly worsened in the 32 months since the 'review of property conditions in the private rented sector' was published. This is a matter outside the control of both the control of the Council and the landlord, but it needs to be considered as it may impact on the sustainability of the area being licensed. Should a fire sale be a consequence, there are few who could reputably take over an unprofitable enterprise.

Accreditation and other means of mitigating fees

The DCLG report 'Review of property conditions in the private rented sector' explored the advantages of accreditation as an adjunct or an alternative to licensing. *4.4 as an alternative to licensing, many Local Authorities have introduced a voluntary accreditation scheme for landlords in their area. This is an approach that we encourage. The schemes aim to raise standards by providing education and training to landlords, identifying poor practice and generally increasing levels of professionalism amongst landlords.*

4.6 whilst voluntary accreditation has been well received by landlords and has increased landlords awareness of their responsibilities, its impact has been fairly limited, as there is no requirement on landlords to join such schemes. Accreditation tends to be taken up mainly by the reputable landlords. On the other hand, knowing which landlords are accredited may help Local Authorities target action against non- accredited landlords who are failing to meet their responsibilities.

Before making a decision to designate any area for Selective Licensing, an authority must consider whether there are alternative means of addressing the issues, for example through the introduction of voluntary accreditation scheme for landlords. It must also ensure that any proposed licensing

scheme fits with its overall housing strategy and policies on homelessness and empty dwellings.

Finally, we observe that in order for a scheme to be approved, such a Selective Licensing Scheme must be shown to be coordinated with an Authority's wider strategies to deal with antisocial behaviour and regeneration.

(Explanatory note to Housing Act 2004 paragraphs 26-28)

Our Association is of the opinion that there is no justification for the implementation of Selective Licensing within the City of Brighton & Hove. The papers we have studied recommending a consultation and the justification of such schemes being introduced are not considered accurate and in any event do not identify those properties for which the scheme would be introduced. We recommend you to vote against the consultation for Selective Licensing.

Southern Landlords Association (SLA) Questions and Responses

Additional/Selective Licensing Proposals

I write on behalf of the Brighton & Hove committee of the Southern Landlords Association (SLA) seeking replies to a number of questions in relation to the proposals to introduce additional licensing throughout the city and Selective Licensing in the twelve wards already subject to Additional Licensing.

As the replies to these questions are important for our Association, in order to form an opinion on the legality of either or both schemes, an early reply will be appreciated.

Current Additional Licensing Schemes

1. How many Special Interim Management Orders (SIMOs) have been issued under the current Additional Licensing Schemes? **Response: No such Orders have been issued**
2. How many landlords have been prosecuted for serious offences associated with their properties? **Response: 26 since April 2009, with one more awaiting court hearing**
3. How many properties have been found with sheds containing beds which were being let out? **Response: No such properties have been found**
4. How many non-compliance notices have been issued? **Response: Not sure what you mean by non-compliance notices and would be grateful if you could clarify**
5. How many antisocial behaviour orders have been issued against specific tenants occupying private rented sector properties? **Response: In 2015/16 the Community Safety Casework Team received 418 reports of ASB (plus 82 relating to hate incidents) occurring in Brighton & Hove, except on council housing premises. These initial reports may be in respect of multiple incidents. Anti Social Behaviour Orders (ASBOs) have been replaced by Criminal Behaviour Orders (CBO) and ASB injunctions with the advent of the Anti Social Behaviour, Crime and Policing Act in November 2014. The Community Safety Casework Team works to address ASB and hate in the private rented sector and owner occupier properties, along with non-housing related ASB and hate across the city, and will give consideration to all enforcement options if necessary, including CBOs and injunctions. Any ASBOs still in place relate to people and are not listed by housing tenure so this data is not available.**
 - (a) If the antisocial behaviour (particularly noise) is caused by students, what procedures are in place (if any) for reporting such antisocial behaviour to the universities and if so what action does the university take against such students? **Response: If anti social behaviour is reported to the Private Sector Housing Team contact will be made with the landlord/licence holder to advise them of the issue. Both the University of Sussex and the University of Brighton are keen to receive reports of any issues with students living in the community and would welcome direct contact so they can assist where possible. Generally they will warn students**

about their behaviour and may take steps about informing their parents or even terminating university places if the behaviour continues/is particularly serious but you would need to check with the universities directly about the action that they take when informed about a particular issue.

(b) Have any students been suspended/expelled for antisocial behaviour? **Response: This information is not available to the council and you should contact the universities direct for this information**

(c) What support by the Local Authority is available to landlords for dealing with problem tenants? **Response: Landlords can contact the Community Safety Casework Team's duty service for general advice and guidance, however they are not able to give specialist legal advice so would signpost landlords to solicitors as appropriate. If the complaint is noise nuisance landlords can speak to BHCC Environmental Health Team so that they can give advice and/or open an investigation. The council is developing an information leaflet on dealing with anti social behaviour to include with licences to provide more guidance and support to landlords.**

(d) How is a landlord expected to know if a prospective tenant has a record of antisocial behaviour? **Response: Landlords could be alerted to issues with previous tenancies through seeking references**

6. Paragraph 3.12 of the report from the council (agenda item 43), it is stated that 88% of properties inspected (October 2016) - 2,629 out of 3,004 required improvements, benefiting 13,000 tenants. Did any requirement, i.e. fitting of an extractor fan, replacement of a fire blanket (usually misused by the tenant) be included as part of the 88%. In other words, was everything included in the 88%, even the most minor of faults found? In such circumstances, can you supply figures detailing properties by number with serious faults, non-serious faults or faults that would be discovered on any routine maintenance inspection? **Response: All special conditions - those conditions specific to a given property as opposed to the standard conditions that are included on every licence - were included. Some further detail is given at paragraph 3.51 of the report.**

(a) Paragraph 3.15 The Government legislated to protect tenants who justifiably complain about disrepair. What substantive evidence does the Council have to support the assumption that tenants are still frightened to complain that justifies more licensing. Does the Local Authority publicise the protection afforded to tenants and if not, why not? **Response: National research has indicated that reporting issues with disrepair still remains an issue for tenants as illustrated in Shelter's publication in 2014 'Can't complain, why poor conditions prevail in private rented homes' and more recently in March 2017 by the Citizens Advice Bureau 'A state of disrepair, why renters deserve a better deal'. The Private Sector Housing Team encourage tenants to report disrepair issues to their landlords and publicise Rent Smart as a source of information.**

7. Paragraph 13.9 states that evictions from the private rented section are consistently the single biggest cause of homelessness in the city. It then infers that by improving quality of accommodation it will reduce homelessness. Can it be explained why the local authority considers that landlords who evict tenants for rent arrears, bad behaviour, non-compliance with tenancy terms, will not evict such tenants, following the implementation of licensing. Can the Council also explain their reasoning behind assuming that this will happen, when they appear to have taken figures of evictions, rather than consulting any tenants who have left their accommodation because of poor living conditions? **Response: Paragraph 3.19 of the report states that the Homelessness Strategy 2014 identifies that homelessness from the private rented sector is consistently the single biggest cause of homelessness in the city. This could be for multiple reasons with non compliance with tenancy conditions e.g. rent arrears being one reason for this happening. Other reasons for loss of accommodation could include poor living conditions and landlords deciding to bring the tenancy to an end. Our experience to date is**

that some tenants have moved/want to move out of rented housing because of poor conditions and this may result in either a homeless application or an application to the Housing Register.

8. Paragraph 3.22. In view of this paragraph, how does the Local Authority come to the conclusion that it is the private rented sector that is causing the problems, even in those wards with under 10% PRS properties. **Response: This is outlined in the body of the report and the independent evidence commissioned from MHA appended to the report. Section 2 of the MHA report provides details on the data sources used in the research and analysis.**
9. Paragraph 3.51 The Additional Licensing Scheme in respect of five wards is due to expire in November 2017 and it is stated that 70% of landlords have complied with the licensing conditions. Why therefore is re-licensing justified when the Local Authority itself acknowledges the majority of these properties/management is up to standard. **Response: The current position is that proposals alongside the evidence to support the schemes were agreed for consultation purposes. Following closure of the consultation period a comprehensive report will be prepared for the council's Housing & New Homes Committee and that would include justification for any new scheme(s) that might be recommended for taking forward.**
10. Paragraph 3.52 (For information) The city centre scheme is due to expire in November 2020 and not 2019 as stated in that paragraph. Under what regulations does the Local Authority consider that if an additional licensing scheme is not renewed for those five wards that the properties would automatically be subject to Selective Licensing when it has already stated that 75% of the properties comply with the additional licensing conditions. **Response: Thank you for correctly pointing out that the current city centre scheme ends in 2020 not 2019. Other than those properties occupied under statutorily exempted tenancies, selective licensing covers all rented properties which are not HMOs that are required to be licensed under national or additional HMO licensing. It follows that a small HMO is exempt from any selective licensing scheme covering its area for as long as it is included in an additional licensing scheme but this exemption would cease should the additional scheme end during the life of the selective scheme.**
11. Paragraph 3.53 No disadvantages are mentioned in respect of introducing city wide additional licensing. Why has the Council not stated as a disadvantage, that the cost of the scheme is likely to be passed to tenants in additional rent. Does the Council not accept that a number of landlords will consider disposing of their properties, in view of the continual costs that they are having to bear and that this should also have been entered in the disadvantages column? **Response: Your comments are noted. Our experience to date with HMO licensing is that it has not had a material effect on the level of rents or availability of accommodation in the city.**
12. Paragraph 3.27 It is stated that where a property is known to be a licensed HMO, a request for assistance is 13.2 times more likely than other properties. When combining known and predicted HMOs, a request for assistance is 3.9 times more likely than other properties and a noise complaint is 2.8 times more likely than other properties. Can the Council explain why the conclusion from these paragraphs is that there is no significant noise nuisance from other private sector properties, i.e. single family dwellings and self-contained studios/flats that justifies any Selective Licensing in the twelve wards where it is proposed to do so. In this regard, the Local Authority should be able to identify complaints in respect of noise or other matters to individual properties and therefore is able to establish any specific area/property where such troubles require the introduction of Selective Licensing. Why has the Council not therefore listed any areas/streets/individual properties where the complaints are such as to justify Selective Licensing or Interim Management Orders for those properties? Please produce a schedule showing the properties where noise complaints are being received on a regular basis, where those properties are individual houses/self-contained flats, etc. **Response: The research indicated relative increased likelihoods of service requests from privately rented dwellings, rather than that there are no significant noise nuisance from single family dwellings or self**

contained studios/flats. The map at page 259 of the committee report papers linked the research data to geographical areas across the city. As I mentioned in 9 above, recommendations for any new scheme(s) following consultation would be part of a comprehensive further report to Housing & New Homes Committee, along with related justifications to enable Members to make decisions based on full information.

13. Paragraphs 3.29 to 3.31 No schedule has been prepared in respect of private rented sector requests for assistance or the nature of the enquiry. One would not have expected to have anywhere as near, if any at all, RFAs from owner occupiers. Can it be explained why a high concentration of private rented sector properties in area justifies either Additional or Selective Licensing. In respect of RFAs, it is clear that most occur in the late autumn/winter and many probably concern damp/condensation. Has the Council a record of all such cases and what action it has taken in respect of such matters. Does the Local Authority contact landlords where RFAs are made, to establish firstly that the tenant has contacted his/her landlord in writing and with what result? Why does the Local Authority consider that RFAs by number justify any form of licensing without being analysed in detail, as follows: a) the reason for the complaint and b) the area in which the complaint has occurred in respect of Selective Licensing proposals.

Response: Paragraph 7.4 of the 16 November 2016 committee report outlines the criteria that needs to be made in order to make a designation for a Selective Licensing Scheme. A high proportion of properties in the private rented sector in the proposed area is one consideration. Yes the council does have a breakdown of the reasons for Requests for Assistance and a snap shot for the 2016/17 financial year is enclosed for your information – 1,405 requests were dealt with during this time.

14. Pest control. Included as antisocial behaviour are notifications of pest incidents. a) Does the Council employ a pest control officer? b) Does the Council still employ an officer who visits properties and deals with matters of pest control, i.e. mice, rats, pigeons, etc. If the Council employs such a person or persons, why is it considered reasonable to consider pest incidents as antisocial behaviour and why does the Council, in view of the relative steady incidents, that this is yet another reason for implementing Additional/Selective Licensing in the city. **Response: The council does have a Pest Control Team who can be contacted to provide advice and assistance to households. Pest incidents fit into the nuisance category of ASB and is one factor amongst others such as noise and nuisance behaviour.**

15. It has been noted that in many areas where Additional Licensing has been introduced, particularly some roads in the first five wards, that vegetation is growing out of the gutters and paths, which is the Local Authority's responsibility to clean and remove. Why is it that the Local Authority is not cleaning, sweeping and removing vegetation/weeds from many streets in the additional licensed areas and what proposals are there for the Local Authority to carry out its responsibilities in this matter? **Response: Weeds are sprayed twice a year with this due to take place shortly. The council also takes account of weather conditions which can make growth much faster than anticipated and operatives are tasked with removing weeds outside of spraying times.**

16. In view of the high density of residents in certain areas and in particular the earlier wards subject to Additional Licensing, it has been noted that despite the high density of tenants, the Local Authority is supplying disposable refuse bins for each property with inadequate covers and is not collecting on a sufficient, regular basis needed for such intense occupation and that as a result, rubbish gets scattered (often by seagulls). What steps are the Local Authority taking to address the disposal of rubbish in secure containers and with a frequency necessary to meet the needs of these neighbourhoods to ensure that vermin/the street scene is not affected by such lack of action on behalf of the Local Authority? **Response: Lewis Smith, City Clean has recently made contact with the Strategic Housing Partnership representatives for the SLA and NLA about the issue of waste disposal in the city for HMO's, which we hope will be useful. Rubbish disposal bins with lids (including larger bins) can be ordered through the council's website as can**

recycling bins. If a household believes that the bin is insufficient they can contact City Clean and check whether they qualify for bigger bin. Wheelie bins for recycling have also been put in place in the city. Household rubbish is collected on a weekly basis with recycling collected on a fortnightly basis. City centre communal bins are also in place.

17. The consultants have accepted that between 2013 and 2016 there has been a (to use their words) slight drop in antisocial behaviour during that period. If one turns to the increase in private rented sector properties between 2001 and 2011, which equates to a 30% increase, and since that date has been continuing on a similar scale, the conclusion must be that antisocial behaviour in respect of noise nuisance, is not only slightly reducing but is significantly reducing and, on that basis, how does the Local Authority justify any proposal to extend Additional Licensing or introduce Selective Licensing? **Response: Your comments are noted. Paragraphs 7.3 and 7.4 of the 16 November 2016 committee report outline the criteria that would need to be met to satisfy the introduction of either an Additional Licensing Scheme or Selective Licensing Scheme in the city. Members considered a range of factors and evidence before agreeing to go out to consultation on the preferred option for extending licensing across Brighton & Hove.**
18. References. It is proposed that a condition of licensing will be that references are obtained from potential tenants. It is unusual for students, especially those attending universities from foreign countries, to be able to produce references. More importantly, homeless people often cannot provide any real worthwhile information and certainly almost all cannot produce any form of reference. a) Is it therefore reasonable to assume that landlords who at present house such people will not be able to do so in future, as it will break licence conditions. b) How does the above situation equate with Brighton & Hove City Council policy for dealing with homelessness? **Response: In the draft conditions available on the council's website we have included an additional clause under 1.2 which states: 'It is understood that in certain circumstances it may not be possible to obtain a reference i.e. where it is a first tenancy or newcomer to the UK. In these circumstances you must provide evidence that you have explained, and the tenant understands the implications of them not adhering to tenancy conditions'. This proposed condition will help deal with scenarios where the tenants are unable to provide a tenancy reference.**
19. The SLA Committee considers that the questionnaire provided is not a proper consultation document at all, for example there are no questions about ownership of rented properties in the areas, or how respondents are able (a) to identify 'rented properties' or comment on internal conditions. Please say whether a professional independent company specialising in consultations compiled the questionnaire, and if not who did. **Response: Your comments are noted. The questionnaire was compiled by an in house team of officers. The analysis of the responses will enable us to report back on differences in responses according to who is responding and their experience of the private rented sector. This analysis will be included in the consultation report which will be considered by Housing & New Homes Committee in November 2017.**

Southern Landlords Association (SLA) Questions and Responses

Additional questions and responses

1. Full details of how the costs in respect of obtaining licences are made up. **Response: The final fee structure for the new schemes if they go ahead will only be agreed at committee in November so at present we can only provide information about current fee structure. This information has been provided to the Southern Landlords Association previously but please let me know if you would like to receive it again.**
2. As the licensing proposals relate, in part, to the necessity of inspecting some 27,000 properties, what programme has been put in place in respect of these inspections, with timescales, etc.? **Response: No final programme has been established for a Selective Licensing scheme as this**

will need to be consistent with any final decision made about possible new schemes by Housing & New Homes Committee and, if necessary the Secretary of State. The proposed fees the council consulted on were based on a visit to each property.

3. Flats within large HMOs are already licensed. Is it proposed that those self-contained units within licensed HMOs will be subject, additionally, to Selective Licensing and that further fees will be required to be paid? **Response: Selective licensing does not apply to HMOs that have to be licensed under the National or any Additional Licensing Scheme.**
4. Is it anticipated that, if additional licensing is renewed in the five wards due to expire on 4th November 2017, those properties are to be re-inspected? If so, for what purpose? **Response: Yes – the proposal outlined in the consultation will be to inspect all properties subject to licensing. This will be to check on compliance against scheme conditions and standards. We have proposed a fee structure for any Additional Licensing Scheme which is in line with the national scheme. This recognises that licence applications that have been subject of an initial inspection previously will require less work due to some information already being available. Such applications under the proposed fee structure would result in a lower fee.**
5. We mentioned some time ago that the SLA was intending to set up a small representative committee of approximately three people to discuss, in particular, the licensing conditions, costs and further benefits SLA would like to see included. Our representatives are able to attend a meeting on 20th September 2017 at 11am and perhaps you would let me know whether this date and time is suitable for yourself. If not, it would be helpful if you could give me alternative dates/times. **Response: This meeting is now arranged for 27 September.**
6. Brighton & Hove City Council will be well aware, no doubt, of the very serious problems occurring in a property in May Road, Brighton which has been well publicised, with significant police involvement. It would be helpful to know whether that property is owned by the Local Authority, a housing association or a private landlord, and what action has been taken, in view of the serious matters going on and associated with that property, to close it down to ensure that no further serious crimes take place. **Response: Please find attached a link to the press release regarding a closure order recently obtained in respect of 41 May Road www.brighton-hove.gov.uk/content/press-release/action-tackle-anti-social-behaviour This press release outlines the steps taken at this property.**

Southern Landlords Association (SLA) Received 6 October 2017. Meeting held with SLA Committee Members on 25 October 2017 to discuss their proposals

SOUTHERN LANDLORDS ASSOCIATION (SLA) AMENDMENTS TO BRIGHTON & HOVE CITY COUNCIL PROPOSALS TO INTRODUCE SELECTIVE LICENSING IN TWELVE WARDS AND EXTEND ADDITIONAL LICENSING THROUGHOUT THE CITY

1. Selective licensing

That the proposal to introduce selective licensing in twelve wards does not meet the requirements set out by the Department for Communities and Local Government (DCLG) and is therefore unlawful and should not be introduced.

2. Inspections

In order that the Local Authority can concentrate on finding and dealing with any 'rogue landlords' in the city, the SLA considers that as an alternative to the Local Authority carrying out property inspections, landlords should be able to use private, professional surveyors, as has been introduced with good results in Southampton.

3. Scheme costs

The SLA considers that the fee structure should be straightforward, simple to understand and operate, and, in particular, aim to 'hit' bad landlords and be a light touch for the good, compliant

ones.

(a) Fees

Compliant fee: £560 – for any number of occupants, to include both properties let on one agreement or on individual agreements.

Non-compliant fee: £960 – for any landlord who fails to make a licensing application after four months.

(b) Discounts

Early-bird discount: A 15% reduction of the compliant fee – for members of recognised landlords' associations with Codes of Practice.

4. Additional discounts

Multiple applications by landlords

This is where one landlord has a number of licensable properties and where only one check is required of the landlord's 'fit and proper person' status: A discount of 15% for compliant landlords on all properties above the first.

5. Committee

A small committee of landlord representatives to meet with the Local Authority three-monthly for the purpose of agreeing amenity standards, progress of licensing and to agree to any alterations to licensing conditions before changes are made.

6. Amenity standards

It is proposed that there be two sets of standards: one for 'shared houses' let on one agreement and another higher standard for bedsits let on individual agreements.

A more streamlined procedure to be agreed for inspections of accredited landlords' properties and those properties for which licences are being renewed. (Less costly).

To be negotiated by the proposed committee (see paragraph 5 above).

7. Renewal fees (additional licensed properties)

- (a) It is assumed that no licence will be required to be renewed in any area before expiration of the current licence.
- (b) As no fee structure has been published in the 'questionnaire' for additional licensing, SLA is not in a position to make proposals at this point in time but expects all proposed fees to allow for the significant reduction in both management and inspection costs.
- (c) SLA will wish to agree inspection requirements and that private surveyors can be used.

8. Accreditation

- (a) SLA: The SLA supports accreditation of landlords but is well aware that, in the past, few landlords have joined accreditation schemes, mainly because there were no benefits to be gained (other than to say that you were 'accredited').
- (b) Provided real benefits can be achieved for landlords, more will wish to be accredited as part of the licensing process.
- (c) Proposal: The SLA accepts that the Local Authority has a duty to inspect (as soon as practicable) all licensed properties. Accredited landlords will be aware of their obligations to comply with the licensing standards, and therefore less intense inspection of accredited landlords' properties is necessary and should therefore justify a lower fee whether those inspections are carried out by the Local Authority or private surveyors, and they should reflect in the agreed guidance for such inspections.

The discount should be similar to the one (yet to be agreed) for inspections of properties under the additional licensing renewal scheme.

9. Application forms

The negotiating committee has been informed that Brighton & Hove City Council is amending the licensing application forms and will pass copies to the committee as soon as available (about two weeks).

Application forms have been revised for the Southampton additional licensing scheme in conjunction with SLA, and those forms are considered straightforward and fit for purpose. SLA would like Brighton & Hove City Council to look at the forms supplied by Southampton City Council, in order to obtain the most sensible application form.

10. Other matters

(a) Staggered licensing fees

SLA proposes that any landlord with five or more properties to be licensed is able to pay in five annual instalments, in order to spread the cost of licensing and to give the Local Authority income from fees spread over the five-year period of the licence. As the work will involve staff over the five-year period, it seems sensible that landlords, in order to have a sensible cash-flow situation, be able to pay in five annual payments.

(a) Transfer of licences

It is proposed that licences should be transferrable between landlords and not require the new landlord to obtain a new licence upon purchase. A simple change of owner form should be created, with a minor fee for landlords to pay the Council.

11. Summary

The SLA proposals set out above are to simplify the schemes, with the objective of making the cost to compliant landlords (the vast majority) as low as possible whilst ensuring that the financial viability of the scheme is not undermined but is paid for by those landlords who do not comply. A similar scheme has been negotiated with the SLA and operates successfully in Southampton and it is possible that the Lead Councillor for Housing would be prepared to explain it in more detail, should that be desired.

National Landlords Association (NLA)

Additional Licensing Scheme Response

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. More than 72,000 individual landlords from around the United Kingdom are members of our organization. We provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. The NLA seeks a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities.

Overview

4. The National Landlords Association (NLA) would like to thank Brighton and Hove Council for providing the opportunity to comment on the proposed introduction of additional licensing.
5. The ability to introduce additional licensing is a powerful tool. If used correctly by Brighton and Hove Council, it could resolve specific issues. Your scheme currently ends this year; this proposal should be put on hold until government has unveiled their proposal, which is in the same time frame as the council's, to avoid confusion.
6. In the Government procedural document, 'Approval steps for Additional and Selective Licensing Designation in England', it states that in order to apply for licensing a local housing authority *'will have to show how such a designation will be part of the overall strategic borough wide approach, and how it fits with existing policies on Homelessness, Empty homes, Regeneration and Anti-*

social behaviour. As the council is in the process of producing a stock condition survey, why has the council produced a consultation before a report has delivered its findings? Your consultation document also does not point out how it would fit in with the strategies.

7. One of the dangers of the proposed additional licensing scheme could be that the costs are passed on to tenants, thus increasing costs for those who rent in an area, along with the Council's costs. That would increase costs to Brighton and Hove residents, especially the most vulnerable.
8. In many places, such as Newham, Oxford and Bath where they introduced (in addition to the additional licensing) an article 4 direction, the result has been a reduction in the amount of shared housing that is available. This has resulted in the council looking to house many local people outside the council's boundary, increasing costs for tenants and the council.
9. This policy could also have an impact on house prices in the area, due to those with permitted development rights having a premium. This has been seen in other areas of the country.
10. The scheme does not take into account Airbnb or those that practice rent-to-rent. These need to be addressed, if the scheme is to work.

Resources

11. Areas that have seen the introduction of additional licensing have seen mortgages withdrawn (Nat West and RBS). This could have an impact on the housing market. It could increase the cost to tenants and the council in the areas where it is introduced. What analysis has been undertaken of this and of potential change to the market?
12. The increase in the activity will increase the demands on the council; what provision has the council made and how many additional resources has the council allocated i.e. staff answering phones, properties available etc.?
13. The council should consider alternative schemes such as the Home Safe scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives, which the council has not reviewed. This involves management of the landlords and tenants, thus management of the whole situation, which would be a more appropriate outcome. This would also save the council money.

Societal impact

14. In addition to young professionals and students, migrants make up an important part of the shared housing market in Brighton and Hove. For obvious economic reasons and for flexibility, shared housing is an important source of housing for these groups. However, demand is not static. Thus the impact of these policies will have an impact on the lower economic groups within Brighton and Hove. What measures are the council taking to mitigate these issues, which include increases in housing costs?
15. The cost to rent in Brighton and Hove is lower than in central London, a policy such as this will limit supply at the same time as pricing out local people, but shared housing will still be available to inner London Boroughs.
16. Schemes such as additional licensing have put houses that are shared at a premium, which has added value to them staying shared. The council's policy will prevent new entries into the market, thus creating a monopoly. Thus properties that have shared usage will have a higher value than those that do not. Landlords will not be inclined to return them to family use, as they have higher value in shared usage and landlords will wish to preserve that status.
17. The use of additional licensing that is landlord-/property-based will not resolve many of the issues that are caused by tenants – they are tenant-based issues. Landlords have limited powers for addressing these as any direct action by the landlord to address issues such as ASB can be called harassment by the tenant.
18. The NLA believes that any regulation of the private rented sector needs to be balanced. Additional regulatory burdens must focus on increasing the professionalism of landlords and the quality of private rented stock and driving out the criminal landlords who blight the sector. The

shared objectives of all parties involved should be to facilitate the best possible outcomes for landlords and tenants and, as such, good practice should be recognised and encouraged in addition to the required focus on enforcement activity. In light of the current economic climate, the last thing good landlords need is regulations or licensing schemes, particularly where there appears to be limited direct and immediate benefit to landlords or tenants.

Examples elsewhere

19. The changes will make it advantageous for landlords to hold on to a shared house rather than let it go back into family use. This policy, as has been seen in other parts of the country, will see crystallisation of shared housing and a block on new shared housing. This will increase the costs of those renting shared housing, as you will be stopping new entries into the market and those with shared housing will be hesitant to return a shared house to family use as they will not get conversion back.

Creating tension in relationships

20. In relation to ASB reduction and the authority a landlord has to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords who are confronted with cases of serious ASB in one of their properties will be to seek vacant possession and, in many instances, they will need to serve a Section 21 notice, rather than a Section 8 notice which identifies the grounds for possession. The former is simpler and cheaper and repossession (at present) is more certain. No reason needs to be given for serving a Section 21 notice and, in this case, the perpetrator tenant can hypothetically approach the local authority for assistance to be re-housed (ref: Homelessness Guidelines cl 8.2). Crucially, no affected party needs offer evidence against an anti-social householder, thereby reducing the risk of intimidation, harassment and, ultimately, unsuccessful possession claims. The issue of ASB will, thus, not appear as a factor in the repossession. However, in providing evidence to support a licensing application, the document should clarify, for the respondents, the position of all the relevant issues under landlord and tenant law.
21. Landlords are usually not experienced in anti-social behaviour management and do not have the professional capacity to resolve tenants' mental health issues or drug and alcohol dependency. If there are allegations about a tenant causing problems (e.g. ASB), even if the tenant has the above issues, a landlord ending the tenancy will have complied with their obligations under the additional licensing scheme. This moves the problems around Brighton and Hove but does not actually help the tenant, who could become lost within the system. There is no obligation within additional licensing for the landlord to solve the ASB allegation; rather, a landlord has a tenancy agreement with the tenant and this is the only thing that they can legally enforce.
22. This was reaffirmed in February 2017 when the House of Commons library published the briefing paper entitled 'Anti-social neighbours living in private housing (England)'. This explains: 'As a general rule, private landlords are not responsible for the anti-social behaviour of their tenants.' (<http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01012>)
23. It would be useful if the council could clarify its policies and put in place a guidance document which would outline the council's position on helping landlords remove tenants who are causing anti-social behaviour. This is worse in shared housing when a tenant has to share parts of the house with other tenants.
24. The NLA would like further explanation on how the council will work with landlords to mitigate the losses when tenants leave a property early but where they still have a tenancy. If a landlord has problems with a tenant, how will the council help the landlord? The ability of a landlord to enforce the law against a tenant that is causing anti-social behaviour comes from the civil court where the burden of evidence is different to that of a criminal court. Although the burden is

lower, the length of this process will often exceed the period of the tenancy. Why would a landlord continue a case against a person who is no longer a tenant? A landlord also risks the tenant causing damage to their property if they start legal proceedings against the tenant. If a landlord has started a process, this will not appear on any council document, so how will the council expect to measure this?

Conclusion

25. The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not use their powers to manage their properties effectively. A more appropriate response would be to identify issues and assist landlords to develop the required knowledge and skills to improve the sector through schemes such as the NLA Accredited Landlord Scheme. This would allow Brighton and Hove Council to target criminal landlords – a joint approach is required.
26. Additional licencing could reduce the amount of shared housing which would probably increase the costs for those who rent, as it would prevent new entries into the market. Thus a more erudite approach to dealing with nuisance and a separate policy to tackle criminal landlords would be more suitable for resolving the issues. Enforcement against those landlords that do not meet housing standards is required. The proposed policy will increase the council's costs.
27. Again, the NLA would like to thank Brighton and Hove Council for the opportunity to respond to this consultation and hope you find our comments useful.

National Landlords Association (NLA)

Selective Licensing Scheme Response

Introduction

1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords.
2. The NLA represents more than 72,000 individual landlords from around the United Kingdom. We provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector.
3. We seek a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities.
4. We thank Brighton and Hove Council for providing the opportunity to comment on the selective licensing proposal.

Executive summary

5. Having considered the evidence presented and having undertaken our own evaluation of the circumstances faced by the residents of Brighton and Hove, our position can be summarised by the following brief points.
 - Landlords have very limited authority to deal with matters related to antisocial behaviour, especially if it happens outside the curtilage of the rental property.
 - The council provides no evidence of any direct link between recorded housing crime and the private rented sector.
 - The scheme will lead to a further displacement of problem tenants in Brighton and Hove.
 - The documentation provided fails to indicate that sufficient funding will be available to support the introduction of licensing.
 - The council fails to say how it will prevent malicious antisocial behaviour claims being made that could result in tenants losing their tenancies.
 - The document does not take into account other local authorities placing tenants in Brighton and Hove.
 - The council fails to say how the proposal will tackle “rent to rent” and subletting.
 - The proposal does not take into account Airbnb or short-term holiday lets which are popular with stag and hen parties.

6. We contend that the flaws in the process and proposals outlined above must be rectified before this application is progressed. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be repeated (if permissible), ensuring engagement with all relevant stakeholders.

General feedback on proposals

7. The ability to introduce licensing (selective) is a powerful tool. If used correctly by Brighton and Hove Council, it could resolve specific issues. We have supported many local authorities in the introduction of licensing schemes that could benefit landlords, tenants, and the community.
8. We believe that any regulation of the private rented sector must be balanced. Additional regulatory burdens should focus on increasing the professionalism of landlords, improving the quality of the private rented stock, and driving out the criminal landlords who blight the sector. These should be the shared objectives of all the parties involved, to facilitate the best possible outcomes for landlords and tenants alike. As such, good practice should be recognised and encouraged, in addition to the required focus on enforcement activity. This is not the case here.
9. The proposal does not take into account “rent to rent”, or those who exploit others, whether tenants or landlords. Criminals will always play the system. For instance, there is no provision for landlords who have legally rented out a property that is then illegally sublet. The council is not allocating the resources to tackle the problems that criminals will cause. Often, landlords are victims just as much as tenants.
10. Neither has the council taken into account all best practice, such as how Newham Council reorganised its services and allocated additional resources to help tenants and landlords. There are many examples of best practice from other councils but the current proposal fails to reference them. The council says that it can deliver the scheme within the scheme’s fees, but this has been shown not to work across the country. Therefore, unless the council is willing to allocate sufficient resources, we believe the scheme cannot deliver what it hopes to deliver. This amounts to misrepresentation to the tenants, the community and the landlords.
11. The proposal fails to address the link between homelessness and other local authorities placing tenants in Brighton and Hove. This practice will have an impact on any selective licensing scheme, yet is absent from the document.
12. The council does not appear to be looking at Airbnb or short-term holiday lets. These are very popular in Brighton and Hove. They will not be covered by the scheme. They are used by weekend groups who can be noisy and cause nuisance, yet they are not part of the proposed selective licensing.
13. Landlords are usually not experienced in antisocial behaviour management and do not have the professional capacity to resolve tenants’ mental health issues or drug and alcohol dependencies. If there are allegations about a tenant causing problems (e.g. antisocial behaviour) and a landlord ends the tenancy, the landlord’s obligations under the selective licensing scheme will have been dispatched, even if the tenant has any of the above issues. This will move the problem around Brighton and Hove but will not actually help the tenant, who could become lost in the system. There is no obligation within selective licensing for the landlord to resolve the antisocial behaviour allegation. Rather, a landlord has a tenancy agreement with the tenant, and this is the only thing the landlord can legally enforce.
14. Brighton and Hove Council has many existing powers. Section 57(4) of the Housing Act 2004 states that a local authority must not make a particular designation... unless (a) they have considered whether there are any other courses of action available to them... that might provide an effective method of Brighton and Hove with the problem or problems in question. The council already has powers that can be used to rectify the problems and, hence, the ability to tackle many of the issues that it wishes to overcome in all parts of Brighton and Hove. These include:
 - criminal behaviour orders;

- crime prevention injunctions;
 - interim management orders;
 - empty dwelling management orders;
 - improvement notices (for homes that do not meet the Decent Homes Standard);
 - litter abatement notices (section 92 of the Environmental Protection Act 1990);
 - fixed penalty notices or confiscation of equipment (sections 8 and 10 of the Noise Act 1996);
 - directions regarding the disposal of waste (e.g. section 46 of the Environmental Protection Act 1990), and;
 - notices to remove rubbish from land (sections 2–4 of the Prevention of Damage by Pests Act 1949).
15. At the start of a tenancy, the landlord outlines to the tenants their obligations in relation to noise, (and waste disposal, compliance with relevant laws, and having consideration for their neighbours). A landlord can manage a tenant only to the extent of their mutually agreed contract for living in the rented property, not for activities in the street or in neighbouring streets. In the case of a noise complaint, the council would have to inform the landlord that the tenant was making excessive noise. The landlord then has the right either to warn the tenant, or to end the tenancy. If the allegation is false or disingenuous, how is the landlord to know? If the same allegation is made on more than one occasion, the landlord may end the tenancy based on an unproven allegation, or because the council says there is a problem. This does not solve the problem, but rather moves it around the borough. The same applies to waste and antisocial behaviour issues. The tenant could be labelled guilty without having faced a trial. Under the reference condition of selective licensing, a guilty judgement can be made without an accusation being tested by a court.
16. The introduction of licensing is likely to increase costs for tenants without solving the problems that the council is trying to target. It will likely move the issues around Brighton and Hove, and place them with other landlords. The issues would be better resolved by a more erudite approach to dealing with nuisance and a separate policy to tackle criminal landlords.
17. Often, when tenants are nearing the end of their contract/tenancy term and are in the process of moving out, they will dispose of excess waste by a variety of methods. This often includes putting it out on the street for the council to collect. This is made worse when the council does not give landlords access to municipal waste collection points. Local authorities with a large number of private rented sector properties within their boundaries need to consider a strategy for the collection of waste at the end of tenancies. We would be willing to work with the council to help develop this strategy.

Negative impacts of discretionary licensing

18. One of the dangers of the proposed selective licensing scheme is that the costs will be passed on to tenants. This would increase costs both for those who rent in Brighton and Hove, and the council. The increasing costs to Brighton and Hove residents would particularly hit those most vulnerable and least able to absorb a marginal increase in their cost of living. Also, the council has failed to explain that, as well as the council's costs for the licence, the landlords' costs will likely be covered by them increasing the rents. The failure to explain this shows a lack of understanding of how the private rented sector works. It could also result in landlords looking for tenants from other councils that are offering incentives (e.g. Haringey is offering a £4,000 incentive to landlords plus the inner London Local Housing Allowance rate).
19. Areas that have been subject to the introduction of selective licensing have seen lenders withdraw mortgage products, thereby reducing the options available to those landlords reliant on finance. Downstream, this increases overheads for landlords, and tenants' costs rise. The lenders that withdraw mortgage availability from a landlord will appear on that landlord's credit history. Other mortgage lenders will assign a higher cost on that landlord, which again will ultimately be passed on to the tenant.

20. Brighton and Hove Council, by proposing to introduce licensing, is implying that there are social problems that could deter investment in the area. The council does not acknowledge the impact that the stigma of discretionary licensing would likely have. It would increase all car and house insurance premiums, but the council has not informed Brighton and Hove's residents of this. We assert that failure to provide such information indicates a substandard and ultimately superficial consultation exercise.

Mortgage and landlord possession statistics 2016¹

Year (calendar)	Landlord type		Claims issued
	Private*	Social	
2016	54,583 (39.7%)	82,789 (60.3%)	137,372 (100%)
*includes all accelerated claims			

1 www.gov.uk/government/statistics/mortgage-and-landlord-possession-statistics-october-to-december-2016

21. The social housing sector has made many efforts to remove problem tenants. Nearly two-thirds of all court possessions (60+%) were from the social sector, see above table. How does the council expect landlords to solve these tenants' issues when the social sector has failed? Many of the tenants who have been removed from the social sector are now living in the private rented sector without any support.

Current law

22. A landlord has to comply with over 100 pieces of legislation, and the laws that the private rented sector has to comply with can be easily misunderstood. A landlord is expected to provide the tenant with 'quiet enjoyment' of the property. Failure to do so could result in a harassment case being brought against the landlord. The law that landlords have to operate within is not always fully compatible with the aims of the council. For example, a landlord keeping a record of a tenant could be interpreted as harassment.
23. Licensing is introduced to tackle specific issues. Many of these are related to tenants, not to the property or the landlord. The challenge for local authorities is to work with all the people involved and not simply to blame one group – landlords. We are willing to work in partnership with the council in developing tenant information packs, assured shorthold tenancies and accreditation of landlords, along with targeting the worst properties in an area.
24. We would also argue that a problem extending no further than a few poorly managed and/or poorly maintained properties would not be appropriately tackled by a licensing scheme, as it is not proportional. In many situations, the council should consider enforcement notices and management orders. The use of such orders would deliver immediate results. Why, instead, does the council wish to do this over five years through a licensing scheme? A targeted, street-by-street approach, working on specific issues and in a co-operative manner with other relevant agencies, such as community groups, tenants and landlords, would have a much greater impact.
25. We would also like to see the council develop a strategy that includes action against any tenants who are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket licensing scheme that would adversely affect all professional landlords and tenants alike, while still leaving criminals able to operate covertly. Many of the problems are caused by mental health and drink and drug issues. Landlords cannot resolve these issues and will require additional resources from the council.
26. The council should consider alternative schemes, such as the Home Safe Scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives that the council has not reviewed or presented in its proposal.

27. As regards the reduction of antisocial behaviour, and the authority landlords have to tackle such behaviour within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264, paragraph 1.1). In most circumstances, the only remedy available to landlords confronted with cases of serious antisocial behaviour in one of their properties will be to seek vacant possession. In many instances, they will need to serve a section 21 notice rather than a section 8 notice, identifying the grounds for possession. The former is simpler and cheaper, and repossession (at present) is more certain. No reason need be given for serving a section 21 notice, and in this case the perpetrator tenant can hypothetically approach the local authority for assistance with rehousing (ref: Homelessness Guidelines cl 8.2). Crucially, no affected party needs to offer evidence against an antisocial householder, thereby reducing the risk of intimidation, harassment, and ultimately unsuccessful possession claims. The issue of antisocial behaviour will thus not appear as a factor in the repossession. However, in providing evidence to support a licensing application, the document should clarify for the respondents the position of all the relevant issues under landlord and tenant law.

Requests for supplementary information

28. We are extremely concerned about the gaps in evidence and justification that occur throughout the licensing proposal. **Response: Your comments have been note**
29. We would like clarification on the council's policy in relation to helping a landlord when a section 21 notice is served. It would be useful if the council could put in place a guidance document before the introduction of the scheme, to outline its position regarding helping landlords to remove tenants who are causing antisocial behaviour. **Response: We are planning to introduce some guidance to be issued with licences to outline actions/steps that can be taken by landlords and the support that is available. Once a draft has been produced we'd welcome your feedback so we can ensure it is as useful as possible for landlords.**
30. We would like further explanation of how the council will work with landlords to mitigate the issue of tenants leaving a property early but where they still hold a tenancy. **Response: We'd be grateful if you could clarify this request as it doesn't seem to directly relate to the selective licensing proposal.**
31. We would like a breakdown of antisocial behaviour complaints for the last five years, subdivided into antisocial behaviour that is proven to be housing-related, and subdivided by housing sector (owner, social, and private rented). **Response: The Community Safety Team receives approximately 700-800 new enquiries every year relating to the private sector, owner occupier, emergency placements and non-housing related. This figure is not broken down further into specific tenures. The council housing department has received 3,553 ASB calls over the past 5 years.**
32. We would like to know what consideration the council has given to homelessness, when tenants cannot access the private rented sector. **Response: The council is committed to preventing homelessness in the city and has a Housing Options service to provide advice and assistance. The council is currently taking part in a homeless trailblazer scheme and I have attached a link to an article on [the Homeless Trailblazer scheme](#) which outlines some of the current actions we are taken.**
33. The council fails to say what additional services will be provided for mental health. This will have an impact on adult social care budgets from the county council. This budget is already under pressure. How much money has been allocated from the county to meet this? **Response: Please could you clarify this question and the link to the selective licensing proposal. Brighton & City Council is also a unitary authority and has responsibility for Adult Social Care.**
34. Finally, we would like a breakdown of the number of orders and powers listed in paragraph 14 that Brighton and Hove Council has used over the past five years. **Response:**
- **criminal behaviour orders (legislation in place since Oct 2014) - 9 live orders**

- crime prevention injunctions (legislation in place since Oct 2014) - 17 orders against 16 individuals
- interim management orders - None
- empty dwelling management orders - None
- improvement notices (for homes that do not meet the Decent Homes Standard) - 68
- litter abatement notices (section 92 of the Environmental Protection Act 1990) - None
- fixed penalty notices or confiscation of equipment (sections 8 and 10 of the Noise Act 1996) - None
- directions regarding the disposal of waste (e.g. section 46 of the Environmental Protection Act 1990) - None
- notices to remove rubbish from land (sections 2–4 of the Prevention of Damage by Pests Act 1949) - 8
- Fixed penalty notices for different offences including fly tipping, littering and graffiti - 5388

Older People's Council

Please find below the response from the Older People's Council concerning your consultation for extending the scheme across the City:-

We are aware that the aim of the scheme is to raise standards in HMO's citywide to ensure that all tenants live in well managed homes. We are also aware that across the City HMOs are particularly associated with student accommodation. But, it should also be remembered that many older people live in private rented accommodation across the City and also need to be able to live in well managed homes. There have been concerns in a number of neighbourhoods about anti-social behaviour, noise complaints, waste complaints and safety concerns in relation to HMOs. The issues around waste and anti-social behaviour are often the source of discussion within Local Action Teams and the Council does need to be proactive with regard to issues raised in local neighbourhoods about such matters. However, in this response we are particularly concerned about safety matters in general and fire hazards in particular. These are particularly difficult for older people who may have limited mobility.

We fully support the objective and the aim of extended the licensing of the scheme. Based on the experience of an OPC member who has been dealing with fire risks to properties for many years we do have a particular view about the need for unannounced checks. For it has been demonstrated that many properties are generally unfit for residents and unsafe. Our main emphasis is on fire safety, our member, having witnessed many breaches of the fire safety protective equipment and management systems. As an example he recently saw fire doors wedged open, combustible bunting hanging from the ceilings and extending from one room to another including through the hall and staircase, obstacles on the means of escape route and combustible storage on the protected routes. This is a small example of the areas which are not upheld by the landlords.

The extension of the licensing scheme is only as good as the enforcement. If this is simply a statistical exercise for the authority to be able to say that it ensures all HMOs are licensed then it is a waste of time. The intention should be altruistic in that the health and safety of occupants is the driving objective. If so, there has to be UNANNOUNCED regular (twice a year) inspections - not simply knee jerk reactions to complaints. We agree with the additional fee and this should assist to pay for the UNANNOUNCED INSPECTIONS. There is no purpose in telling the landlords when you are going to inspect because they simply ensure that all is prepared for the visit. He has had have many landlords tell him the conditions are unsatisfactory on the day of inspection and that this is not the norm! They ask you to come back tomorrow when things will be in order, how? Well! They go in the next day and correct all the breaches of fire safety and health and safety matters ready for the

inspection.

Given the public awareness of fire hazards at present we believe that the safety aspect of any new licensing system must be given higher priority in the future. We trust that you will include our views in your considerations of the results of the consultation.

East Sussex Fire & Rescue Service

Our deputy Chief officer wanted to make the following statement:

In respect of the additional licencing scheme and selective licensing schemes in consultation at the moment within the city of Brighton and Hove, the Fire Authority wishes to welcome the proposals and particularly the detailed lists of fire safety precautions needed to acquire a licence and the reminders of the duties required under the Regulatory Reform(Fire Safety Order) 2005.

We value our partnership work to improve property standards in the city and are keen to move forward with you in delivering this service and provide a consistent approach to the residents of Brighton and Hove. We will monitor the expected increase in workload and carry on working with you to best deal with the additional consultations.

Letting Agent

We are a Letting Agent at 7 Dials and are concerned by the proposed introduction of Additional and Selective Licensing schemes in our city.

Some additional licensing has already been implemented and that has had a definite negative impact on the ability for sharers of 3 or more to find properties to rent. As a result rents have increased due to the lack of available properties.

We absolutely agree in wanting to improve the quality of the PRS, and as an Agent we only take on good quality properties and Landlords that we think will provide homes of the sort we want to manage so that our tenants, our customers, are happy. Indeed many of our tenants have been in their homes for well over 5 years and we prefer to trickle the rents up slowly so that they don't get massive increases, and to try to repair and maintain the properties in timely fashion.

The Council already has many existing powers to combat poor quality housing via improvement notices and ASB via noise notices and confiscation of loud equipment. However, the proposals do not cover the far worse problems of short term lets and Airbnb's with Stag and Hen parties causing mayhem because they know that they are only there for a few nights. Tenants on an AST will live in the neighbourhood for at least the term of the tenancy, probably 1 year or more. It is very difficult as an Agent, or indeed a Landlord, to police ASB since the tenants are supposed to adhere to the AST and if they don't realistically what can one do bar writing, emailing, remonstrating on the phone. If they become abusive or uncommunicative one is virtually powerless. If we have to give them a Section 21 notice (retaliatory evictions may of course be banned under Labour proposals) then the problem is passed on to other Landlords or other areas.

Licensing will increase the costs to tenants at a time when landlords are already feeling the squeeze from reduced mortgage interest relief, increased stamp duty, loss of wear and tear allowance and shortly the abolition of Letting Agent Fees - all of which WILL increase rents.

Use existing powers to police the sector and drive out the criminal landlords who abuse their tenants and probably don't pay tax - as in Newham where some 13000 landlords have had to find £115 million in tax evasion

The National Approved Letting Scheme

INTRODUCTION

NALS www.nalscheme.co.uk is a licensing scheme for lettings and management agents operating in the Private Rented Sector. NALS agents are required to:

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

Agents must provide evidence that they continue to meet NALS criteria on an annual basis, in order to retain their licence. The scheme operates UK wide and has 1500 firms with over 2000 offices.

NALS also administers the SAFEagent campaign www.safeagents.co.uk the purpose of which is to raise consumer awareness of the need to ensure that landlords and tenants should only use agents who are part of a Client Money Protection Scheme, which offers reimbursement in the event that an agent misappropriates their money. The campaign is recognised by Government and our logo appears in their How to Rent guide [How to Rent](#)

NALS is recognised by the GLA as an approved body for the London Rental Standard. We have also become a co-regulation partner with Liverpool City Council.

NALS AND LICENSING

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

NALS believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as NALS) is essential to the success of initiatives such as Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in House of Commons Standard Note SN/SP 4634.

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

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

Furthermore, NALS ensures its members maintain certain operational standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also provide training. All this can be of

assistance to councils who are trying to drive up standards in the PRS.

Although agents are now required to belong to a government approved redress scheme, display their fees and publish their client money protection status, our experience to date suggests local authorities face challenges in enforcing these standards. Membership of bodies such as NALS can reduce the need for the local authority to use its formal, legal powers in these areas.

BRIGHTON & HOVE CITY COUNCIL'S PROPOSALS - SPECIFIC ISSUES

Proposed Licensing Area

We welcome the targeted nature of the licensing proposals, as we believe that, in some other localities around the country, the implementation of licensing has moved far beyond what the government originally intended when the legislation was introduced.

Fee Structure

We are concerned that the fee structure does not include any discounts for agents or landlords that are members of recognised regulatory bodies such as NALS. We would urge Brighton & Hove City Council to consider offering fee discounts to:

- Agents who are members of NALS or a similar recognised body (where the agent is the actual or *de-facto* licence holder)
- Landlords who engage agents that are members of NALS or a similar recognised body (where the landlord is the licence holder)

There are examples of this approach around the country. Several licensing and accreditation schemes entail a degree of “co-regulation” with partners such as NALS. Schemes include:

- Liverpool City Council (co-regulation partners such as NALS accredit agents, who then qualify for discounted fees) <http://liverpool.gov.uk/business/private-landlords/licences-and-standards/landlord-licensing/>
- Thanet City Council (engagement of an agent who is a member of a recognised body entitles landlords to a discount on licence fees) <https://www.thanet.gov.uk/your-services/housing/selective-licensing-scheme/selective-licensing-schemes-an-introduction/>
- Peterborough City Council (currently considering a scheme where membership of a recognised body will entitle agents to a discount on licence fees) <https://www.peterCity.gov.uk/residents/housing/selective-licensing/>
- Newcastle –upon-Tyne (Reduction in fee for membership of the NLA or other nationally recognised accreditation scheme) <https://www.newcastle.gov.uk/housing/private-housing/selective-licensing>

Although each of these schemes differs in detail, all of them offer discounts to accredited agents (and/or landlords engaging an accredited agent) as follows:

LOCAL AUTHORITY	STANDARD FEE	ACCREDITED FEE	% DISCOUNT
Thanet	£587	£385	34
Liverpool	£400/£350	£200	50/43
Peterborough	£600	£50	92
Newcastle	£550	£450	18

We would further point out that, in Wales, the Welsh Government has recently recognised the importance of membership of specified bodies such as NALS and is offering discounted fees to members as a consequence <https://www.rentsmart.gov.wales/en/>

Brighton & Hove City Council's proposed fee of £460, rising to £600 for “prompted applications, seems high. We feel that a discount in respect of NALS membership (or similar) would act as an

incentive to the adoption of voluntary good practice, in line with the council's aim of encouraging landlords and agents to improve their property and management standards. We would suggest that NALS members and the landlords who engage them are less likely to be non-compliant and that, as a result, there would be reduced costs to the council.

We would also suggest that NALS membership mitigates the need for compliance visits to be carried out by the council. For example, the timing and content of these visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by NALS agents.

In our detailed comments below we point out some of the areas where compliance with key standards is an inherent part of the NALS scheme. These are the areas where we think promotion of NALS membership through license fee discounts could ultimately save the Council money, as well as increase the take up of voluntary accreditation.

COMMENTS ON THE LICENCE CONDITIONS

Tenant Referencing

We are strongly supportive of the requirement to obtain references for prospective tenants, as NALS is actively involved in promoting good practice in tenant referencing.

Tenancy Management

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

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

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

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

- The Dispute Service (TDS) and/or
- My Deposits

They are asked to authorise NALS to contact TDS/My Deposits to verify this information.

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

NALS agents are also required to:

- Have a designated client account with the bank
- Operate to strictly defined Accounting Standards
- Be part of a Client Money Protection Scheme.

These requirements provide additional security for client monies held, over and above the requirements of the Brighton & Hove licensing scheme. Again, this is an area where increased NALS

membership would be of benefit to the Council and local tenants.

Licence Conditions Relating to the Property

We welcome Brighton & Hove City Council's drive to improve property standards. We believe that NALS' standards go a long way to ensuring compliance with license conditions.

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

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

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

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

Tenants will be fully aware of access arrangements. NALS agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. NALS agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We note that there is no mention in the scheme of license holders needing to undergo training. In our view, this is a serious weakness.

Membership of NALS means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a *condition* of NALS membership, NALS offers accreditation through an online foundation course as well as qualifications such as BTEC Level 3 in Lettings and Management practice.

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

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

Modules available cover:

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

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

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

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

Anti-Social Behaviour

We note that there are distinctive issues around crime and Anti-Social Behaviour (ASB) in the licensing area. However, we do have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

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

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

Suitability of Licence Holder

We note the requirement that the council would only issue a licence if it is satisfied that the proposed licence holder is a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like NALS, who themselves apply a fit and proper person test.

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

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

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

We believe this certification is broadly in line with Brighton & Hove City Council's licensing conditions and is another example of where promotion of NALS membership through discounts could help to ensure compliance.

Complaints

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

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

Under co-regulation schemes elsewhere in the UK, NALS has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, NALS

can report to the Council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from NALS. We would be happy to come to a similar arrangement with Brighton & Hove.

CONCLUSION

It seems to us that many of the licencing requirements in the Brighton & Hove scheme highlight how important it is for landlords to work with reputable agents such as NALS members. Offering a discount to licence holders who work with a NALS accredited agent would help to promote this.

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

APPENDIX 1 – COMPATIBILITY OF NALS SERVICE STANDARDS WITH TYPICAL SCHEME CONDITIONS

Example Scheme Conditions	NALS Service Standard Requirements
Fees	NALS promotes complete transparency in agency fees. Members provide landlords with a statement of account as often as agreed.
Rent Liabilities and Payments	NALS agents collect the rent and pass it on every month or as otherwise agreed. The agent will keep a separate clients' account to hold all monies.
Contact Details	NALS agents are expected to respond to tenant and other legitimate enquiries in a timely manner. Up to date contact details will enable them to respond to tenants' requests for maintenance or repairs which might in some cases have to be referred to the landlord for approval.
State of Repair	NALS agents visit the property with landlords and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can be confident that NALS agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.
Access and Possession arrangements	NALS agents will visit the property periodically during the course of the tenancy as often as agreed with the landlord. Tenants will be fully aware of access arrangements. At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.
Repairs and Maintenance	NALS agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.
Access, Cleaning and Maintenance of Common Parts	NALS agents will arrange in advance a time for access to the property in order to inspect the condition of the property in accordance with the tenancy agreement.
Level of Facilities	NALS agents ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before you

	commit to the tenancy. They provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.
Deposits	NALS agents provide and fill in a tenancy agreement and take a deposit to protect against possible damage. They will explain the basis on which it is being held and the purpose for which it is required
References	NALS agents choose a tenant in a way agreed with the landlord, taking up references or checking the tenant's rent payment record.
Complaints & Dispute Handling	<p>NALS agents explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.</p> <p>During the tenancy, they will arrange to check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's initial deposit. They will return the deposit as soon as possible, less any appropriate deductions.</p>

Lewes District Council

We feel that this type of regulation of the private rented sector can only be a positive thing for both tenants and landlords. We would welcome the opportunity to share your in your experience of introducing such a scheme.

Natural England

Thank you for your consultation on the above dated 29 June 2017 which was received by Natural England on 29 June 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this Brighton and Hove City Council: New event available Private Rented Housing - Licensing Scheme poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.