Brent Council
Private Housing Services

Selective Licensing Proposal Consultation:
Report of consultation findings

February 2017
## Contents

**Executive Summary** .......................................................................................................................... 1
**Introduction** ........................................................................................................................................ 1
**Private Sector Landlord Licensing Consultation** ............................................................................... 1

**Main Report** ...................................................................................................................................... 8
**Section 1: Introduction** ....................................................................................................................... 9
**Introduction** ........................................................................................................................................ 9
**The purpose of the consultation** ........................................................................................................ 9
**Consultation Approach and Strategy** .................................................................................................. 10
**Evaluation of the Consultation** ........................................................................................................... 14
**Consultation responses** ...................................................................................................................... 15
**Consultation Analysis and Reporting** ................................................................................................. 15

**Section 2: Questionnaire Survey Results** .......................................................................................... 17
**Introduction** ........................................................................................................................................ 17
**Demographic profile of respondents to the consultation questionnaire** ......................................... 17
**Key Findings** ..................................................................................................................................... 23
**Response levels by respondent type, including neighbouring boroughs** ...................................... 24
**Local Problems: Rating of problems in the local area by residents and landlords** ......................... 25
**Local Problems: Opinion on management of the private rented sector** ........................................... 26
**Local Solutions: Opinion on how the PRS Brent might be improved** ............................................... 27
**Opinions on proposed selective licensing conditions** ..................................................................... 31
**Tackling Problems: Support for extending the selective licensing** .................................................... 32

**Section 3: Other comments received through the Licensing Questionnaire** ................................. 35
**Introduction** ........................................................................................................................................ 35
**Specific questions and General comments - Residents, Tenants and Businesses** ....................... 36
**Specific questions and General comments - Landlords and Managing agents** ............................ 36
**Specific questions and General comments - Other Stakeholders** .................................................. 37
**Summary of other comments received through the questionnaire** .................................................... 37

**Section 4: Findings from Forums and meetings** ............................................................................... 38
**Introduction** ........................................................................................................................................ 38

**Section 5: Written submissions** ...................................................................................................... 45
**Introduction** ........................................................................................................................................ 45
**Summary of emails and letters** ........................................................................................................... 45
**Summaries of written submissions** .................................................................................................... 45
**Summary of other comments** ............................................................................................................ 47
Executive Summary

Introduction

1. The Housing Act 2004 gives Councils the power to introduce selective licensing schemes for privately rented properties in order to improve standards of management in the private rented sector (PRS) and lead to an improvement of the area. The power to designate is subject to certain conditions and criteria, including the requirement to consult persons who are likely to be affected by the designation; and to consider any representations made in accordance with the consultation being met.

2. Additional criteria for making a scheme are now in force. [http://www.legislation.gov.uk/uksi/2015/977/contents/made](http://www.legislation.gov.uk/uksi/2015/977/contents/made). In addition to the already existing low demand and antisocial behaviour criteria, the Department for Communities and Local Government “Selective Licensing in the Private Rented Sector” Guide for Local Authorities states that a selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions, being an area experiencing:

   i. Low housing demand or is likely to become such an area;
   ii. Significant and persistent problem caused by anti-social behaviour (ASB);
   iii. Poor property conditions;
   iv. High levels of migration;
   v. High level of deprivation;
   vi. High levels of crime.

3. Brent Council is considering proposals to extend selective licensing to most or the entire borough. As per the requirements of the Housing Act 2004 and subsequent DCLG guidance (Revised April 2010, Approval Steps for Additional and Selective Licensing Designation in England), the Council has conducted a consultation process with landlords and managing agents, residents, tenants and businesses in Brent and with other stakeholders including neighbouring boroughs.

   This report provides a summary of the consultation approach and findings, which will be considered alongside other evidence by the Council in deciding whether and how to extend selective licensing.

Private Sector Landlord Licensing Consultation

4. The aim of the consultation was to provide local residents, landlords/managing and letting agents with an opportunity to provide their views about the draft proposals to extend the selective licensing scheme. Consequently, the consultation covered the following areas:
• Opportunities to provide views about the problems in their local area and in relation to their homes in Brent
• Opportunities to provide views as to how the PRS as a whole in Brent might be improved
• Opportunities to provide views on the proposed licensing conditions
• Support for extending selective licensing for single family dwellings in Brent
• Where selective licensing should apply based on ASB and also one or several of these new criteria: - poor property conditions, high levels of migration, high level of deprivation or high levels of crime,
• Opinion as to what selective licensing would achieve

Consultation Approach and Strategy

5. The approach was primarily governed by the provisions of the Housing Act 2004 and the DCLG guidance (Revised April 2010). Three questionnaires were designed to capture views on the proposals. There was one for residents, tenants and businesses, another for private landlords and managing agents and a third questionnaire for other stakeholders, the latter focusing on interest from London Boroughs of Barnet, Camden, Ealing, Harrow, Hammersmith and Fulham, Kensington and Chelsea, and Westminster, as these boroughs border Brent. The consultation questionnaire was conducted online, though paper forms were made available on request and in certain circumstances such as outreach sessions. Paper forms could be completed by hand and returned to the Council in a pre-paid envelope. The outline consultation was set out in a communications plan.

The aim was to use our customer insight to target our communications and evaluate their impact. The strategy was to use a broadly based communications drive with a mix of all channels to deliver consistent integrated messages. We used wide reaching tactics aimed at targeting all residents and stakeholders with more specific channels being used to reach tenants and landlords. The approach was also informed by an equalities impact assessment (EqIA).

Communications Activities (See appendix A for the full report)

6. The consultation ran for 11 weeks from 30 September 2016 and closed on Friday 16 December 2016, although the web-link remained open 19 December 2016. The vast majority of the work was focused on an external audience, although internal channels were used to engage staff whose work is public facing to act as ambassadors for the consultation and encourage more responses. The channels are listed below and an analysis of each activity is provided in the main report.

External
• Media relations
• Brent website (banner on homepage)
• Poster sites (JCDecaux UK)
• Leaflet drop to all residents & in libraries and council buildings
• Digital adverts on Gumtree and EBay
• The Brent magazine
• Social media (face book & twitter)
• Emails to landlord database
• Emails to stakeholder groups, e.g. housing needs database
• Stalls in Civic Centre and local businesses
• Brent Landlord Forum
• Brent Registered Providers Forum
• Brent Connects
• Brent Citizens Panels
• Voluntary Sector
• Mail out to stakeholders
• Advertising van
• Presentations to stakeholders, e.g. Barnet Landlords Forum
• Report to Brent Members of Parliament
• Briefing to the Chartered Institute of Environmental Health Officers (CIEH) Housing Study & Licensing group
• UK Landlords Accreditation Scheme circulation

Internal
• Stall in Civic Centre
• Yammer
• Word of mouth amongst colleagues, teams and the wider organisation.
• Email footers
• Brent Housing Partnership whose membership includes 14 Brent Registered Providers (Housing Association) Forum
• Briefing session for elected members

Evaluation using the question in the consultation questionnaire

7. The leaflet had the most successful reach with nearly 42% of all respondents naming this as how they had heard about the consultation. The Brent website (11.7%), emails (9.8%) and posters (8.2%) were all roughly similar thereafter. ‘The most popular ‘other’ response was through the in-store surveys and at the Civic Centre.

Figure 1: Evaluating the communications channels
Consultation responses

8. The response to the consultation has been as follows:
   - 1207 responses to the on-line and hard copy questionnaires, 20.7% over the target set in the communications plan (See Appendix A)
   - 205 landlords/managing and managing agents and 855 residents, (which includes 227 tenants living in private rented accommodation 26.55%) and 147 Other stakeholders (the full demographic profile of respondents to the survey is outlined below)
   - Other comments via the questionnaire
   - 11 individual letters/e-mails
   - 4 written formal submissions from the National Landlords Association, the Residential Landlords Association, the National Approved Letting Scheme (NALs via the London Property Licensing), and from Home Safe Limited (see Appendix D for copies of the submissions)

Key consultation findings

9. The key findings are organised in to five themes:
   (a) Demographics and equalities profile of respondents
   (b) Support for extending the licensing scheme and on what would be achieved
   (c) Views about the problems in Brent including anti-social behaviour and property management
   (d) Views on local solutions
   (e) Perceptions about the proposed licensing conditions

Top line Demographic and Equalities Findings

10. Overall, the equalities characteristics are representative of the borough averages with the notable exception of responses from the 18-24 age group.

Support for extending the licensing scheme and on what would be achieved

11. A clear majority (64.9%) of all questionnaire respondents, but mainly residents including tenants and other stakeholders agree that the council should extend selective licensing in Brent with 61.1% in favour of borough wide licensing. While the majority of landlords were opposed to extending licensing, where they agreed they unanimously supported a borough wide scheme:
   - The figure 2 shows that a large majority all of residents (71%) and other stakeholders (76%) generally agree with the proposal to extend selective licensing in Brent, with 21% of residents and 12% of other stakeholders disagreeing.
   - In contrast, 62% of landlords disagreed and 25.49% agreed with the proposal to extend. There was a significant 12% don’t know/no response from landlords. Of the 25.5% landlords who support extending licensing, 22% of them unanimously supported the borough wide proposal.

From the other consultation findings as outlined in sections 4 and 5, some landlords and their representatives were opposed to licensing schemes in principle or would support a system of co-regulation, or with discounts to accredited landlords. Landlord
representatives also suggested that the council should delay the introduction given the new powers being introduced by the government to deal with the private rented sector. Specific concerns expressed by all groups related to licensing schemes bureaucracy, the council’s motives and capacity to deliver the scheme and resources that would be needed to identify unlicensed properties, deal with poor property conditions and to tackle criminal landlords.

Figure 2: Should the Council extend selective licensing in Brent?

Based on the consultation questionnaire survey, landlords disagree but the majority of residents, tenants and businesses agree that introducing selective licensing would tackle problems by achieving all of the following:

- Shifting the reliance away from using resident complaints to identify problems
- Promoting a professional management ethos amongst private landlords
- Providing tenants with consistent information on acceptable standards of accommodation
- Allowing the council to take action against landlords who provide poor standards of accommodation
- Removing rogue landlords from the sector
- Reducing anti-social behaviour in the borough
- Providing safe homes for tenants to live in
- Providing a better approach to managing the private rented sector
- Allowing the council to take action against landlords whose tenants cause persistent anti-social behaviour

Views on local problems including anti-social behaviour and property management

- Notable proportions of both residents and landlords rated matters relating to enviro-crim, police reported crime, lack of community engagement, and migration as serious
or very serious problems. Rubbish dumping and fly–tipping, untidy front gardens, poorly maintained properties, together with the high tenant turnover and high rents featured highest.

- It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime and hence the questionnaire responses overall rate ASB as a serious or very serious problem.
- There is strong agreement from residents that properties are poorly maintained and managed such as that they are contributing to the decline of areas in Brent and further that landlords have a responsibility to manage the properties effectively and to be “fit and proper” persons.

Local solutions

- Residents agreed (89%) and significant few landlords disagreed (16%) that the council should intervene and take control of the problems associated with high levels of ASB. The majority of residents and other stakeholders agreed but landlords equally disagreed that the council should have more control over the way that landlords manage their properties.
- Residents and other stakeholders agree (69.5%), but landlords disagree (74%) that the licensing scheme would help reduce anti-social behaviour

Views on the proposed selective licensing conditions

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree.
- Landlord representatives in their submission indicated where conditions were unnecessary or otherwise and have asked that their points made are considered.

Other consultation findings

From section 3, the most other comments extracted from the open-ended and free text questionnaire fields were about the licence fees, followed by comments on licence conditions, the impact of licensing on landlords and on the impact on tenants. The majority of the comments, in percentage of responses received per group came from the landlords and managing agents.

To a relatively much lesser degree respondents commented upon the potential to improve PRS standards, noting that other measures to do so already exist. Comments were also made about dealing with anti-social behaviour, the evidence base for the proposals and regarding the council’s challenge to deliver licensing, taking into account the amount of bureaucracy thought to be involved.

The forums, meeting and written submissions as outlined in section 4 were useful and largely reflected, in particular, the opinion of landlords and other stakeholders. The consultation interfaces produced face to face discussions and delivered scheme options such as co-regulation, fee discounting, reducing bureaucracy, and calls for the council to delay its plans in view of the new Government legislation being applied to private renting in 2017.
Conclusions

There is majority support amongst residents, tenants, businesses and other stakeholders to the proposal to extend licensing scheme to most of Brent. The views are that problems of ASB, poor property management, lack of community engagement and problems with private tenants exist in the local private rented sector and that the council should intervene to provide a solution. However, there is a majority opposition amongst landlords to the proposal. This opposition centres on the following key points:

- Specific challenges to the evidence presented to support proposing to licence all or most of the borough
- In the timing of the proposal by Brent, in that plans could be delayed to see the impact of the new powers being introduced by the Government in 2017
- That is unreasonable to place the burden on good landlords as licensing will present unnecessary bureaucracy and economic burdens.
- Costs will be passed on to tenants and that some landlords will exit the local market

Where landlords agree (26%) and where there is support for the scheme from licensing representative organisations, the council is being asked to consider a system of co-regulation, greater support for landlords in dealing with ASB and problem tenants, applying licence fee discounts for certain landlords and to set reasonable licensing conditions.
Selective Licensing Proposal Consultation:
Report of findings

Main Report
Section 1: Introduction

Introduction

1.0 The Housing Act 2004 gives Councils the power to introduce selective licensing schemes for privately rented properties in order to improve standards of management in the private rented sector (PRS) and lead to an improvement of the area. The power to designate is subject to certain conditions and criteria, including the requirement to consult persons who are likely to be affected by the designation; and to consider any representations made in accordance with the consultation being met.

1.1 Additional criteria for making a scheme are now in force. [http://www.legislation.gov.uk/uksi/2015/977/contents/made](http://www.legislation.gov.uk/uksi/2015/977/contents/made) In addition to the already existing low demand and antisocial behaviour criteria, the Department for Communities and Local Government (DCLG) “Selective Licensing in the Private Rented Sector” Guide for Local Authorities states that a selective licensing designation may be made if the area to which it relates satisfies one or more of the following conditions, being an area experiencing:

i. Low housing demand or is likely to become such an area;
ii. Significant and persistent problem caused by anti-social behaviour (ASB);
iii. Poor property conditions;
iv. High levels of migration;
v. High level of deprivation;
vi. High levels of crime.

1.2 Brent Council is considering proposals to extend selective licensing to most or all of the borough. As per the requirements of the Housing Act 2004 and subsequent DCLG guidance (Revised April 2010 Approval Steps for Additional and Selective Licensing Designation in England), the Council has conducted a consultation process with landlords and managing agents, residents, tenants and businesses in Brent and with other stakeholders including neighbouring boroughs.

1.3 This report provides a summary of the consultation approach and findings, which will be considered alongside other evidence by the Council in deciding whether to extend selective licensing and if so, the manner in which it should do so.

Private Sector Landlord Licensing Consultation

The purpose of the consultation

1.4 The aim of the consultation was to provide local residents, landlords/managing and letting agents with an opportunity to provide their views about the Draft Proposals to extend the selective licensing scheme. Consequently, the consultation covered the following areas:

- Opportunities to provide views about the problems in their local (Brent) area and in relation to their homes in Brent
- Opportunities to provide views as to how the PRS as a whole in Brent might be improved
• Opportunities to provide views on the proposed licensing conditions
• Support for extending selective licensing for single family dwellings in Brent
• Where selective licensing should apply, based on ASB but also one or several of the new criteria: poor property conditions, high levels of migration, high level of deprivation or high levels of crime, and
• Their opinion as to what introducing selective licensing would achieve

Consultation Approach and Strategy
1.5 The approach was primarily governed by the provisions of the Housing Act 2004 and the DCLG guidance (Revised April 2010). Three questionnaires were designed to capture views on the proposals. There is one for tenants, other residents and businesses, another for private landlords with property in the Borough and a third questionnaire for stakeholders in the London Boroughs of Barnet, Camden, Ealing, Harrow, Hammersmith and Fulham, Kensington and Chelsea, and Westminster, as these boroughs border Brent. The consultation questionnaire was conducted online, though paper forms were made available on request and in certain circumstances. Paper forms could be completed by hand and returned to the Council in a pre-paid envelope. The outline consultation was set out in a communications plan.

The aim was to use our customer insight to target our communications and evaluate their impact. The strategy was to use a broadly based communications drive with a mix of all channels to deliver consistent integrated messages. We used wide reaching tactics aimed at targeting all residents and stakeholders with more specific channels being used to reach tenants and landlords.

The approach was also informed by an equalities impact assessment.

Communications Activities (See appendix A for the full report)
1.6 The consultation ran for 11 weeks from 30 September 2016 and closed on Friday 16 December 2016, although the web-link remained open 19 December 2016. The vast majority of the work was focused on an external audience, although internal channels were used to engage staff whose work is public facing to act as ambassadors for the consultation and encourage more responses.

The channels are listed below, followed by an analysis of activity carried out in each one individually.

1. External
   • Media relations
   • Brent website (banner on homepage)
   • Poster sites (JC DeCaux)
   • Leaflet drop to all residents & in libraries and council buildings
   • Digital adverts on Gumtree and EBay
   • The Brent magazine
   • Social media (facebook & twitter)
   • Emails to landlord database
   • Emails to stakeholder groups, e.g. housing needs database
   • Stalls in Civic Centre and local businesses
   • Landlord Forum
   • Brent Connects
- Brent Citizens Panels
- Voluntary Sector
- Mail out to stakeholders
- Advertising van
- Presentations to stakeholders, e.g. Barnet Landlords Forum
- Report to Brent Members of Parliament
- Briefing to the Chartered Institute of Environmental Health Officers (CIEH) Housing Study & Licensing group
- UK Landlords Accreditation Scheme circulation

2. Internal
- Stall in Civic Centre
- Yammer
- Word of mouth amongst colleagues, teams and the wider organisation.
- Email footers
- Presentation to internal stakeholders, e.g. Brent Housing Partnership
- Briefing session for elected members

Media relations and Reach

Two press releases were issued during the course of the campaign, one at the start to announce it (03/10/16) and one half-way through (15/11/16) to encourage more responses. The releases were sent to local media (Brent & Kilburn Times, and GetWestLondon.co.uk), also to housing and environmental services trade press.

Coverage of the consultation featured in the B&K Times on 04/10/16 and on 17/11/16 in both the paper editions and online and throughout the campaign in trade press including Londonlandords.org.uk, lettingagenttoday.co.uk and londonpropertylicensing.co.uk.

Media coverage providing context

Successful prosecutions of rogue landlord stories featured during the consultation period with three stories in the local and trade media. Although not specifically about the consultation they provide a context to the campaign and motivation to take part in the survey by highlighting the issue of the benefits of licensing as this was also part of the messaging of the news stories. The stories were Buxton Road (01/12/16), Beverley Gardens (07/12/16) and Mapesbury Road (04/12/16).

Brent Website

During the period of the consultation we had a banner news item on our homepage and there were 450 unique page views to www.brent.gov.uk/landlordlicensing.

Online news stories

Poster sites

Posters advertising the consultation were displayed on the large bus stop sites throughout the borough for a period of four weeks from 5 November to 2 December. There were a total of 76 sites including outside high footfall Brent landmarks such as tube stations, shopping areas, Wembley Stadium and the Civic Centre.

Leaflet mail out to residents

On 9 November we sent out a leaflet to all households in Brent, a total of 100,000 with copies also placed in council buildings such as libraries.

Digital advertising

From 7 November to 9 December Navigate Digital placed adverts on EBay and Gum tree websites to drive traffic to our website and encourage completion of the online survey.

The Brent Magazine

The Brent magazine reaches 320,000 readers monthly and is heavily promoted through our social media channels. In the winter edition of the Brent magazine we had a double page feature on the campaign, explaining the background and aims. One page of the double feature was the advert to take part in the consultation and signposting to the website, and how to get a paper copy of the survey.

Social Media - Twitter and Facebook

During the campaign we sent out a total of 12 tweets, which received 5 engagements (likes or retweets). We used the hashtag #Brentlandlordlicensing. The Brent Twitter account has 14,700 followers. 5 adverts were posted on Face book during the course of campaign.

Communications to landlords and stakeholder groups

A total of three emails were sent to our landlord database which contains 3293 addresses, containing a link to the consultation and a summary of what it was about. The first was sent at the start of the campaign, the second on 02/12/16 with a reminder that there was only two weeks left to take part, and the final on 14/12/16 with a two days left reminder.

Two emails to the housing needs database, one at the start of the campaign and one on 14/12/16 with a two days left reminder.

An email to 80 stakeholders on 05/12/16, another one to 19 registered housing providers on 05/12/16. Letter and copies of the consultation were sent to 85 stakeholders by post. All stakeholders are connected to the organisation, and are established contacts to receive information from Brent.

Stands in Civic Centre and retail locations

Between 03 November and 13 December we held a total of seven public information stands in the Civic Centre, large retail locations and council buildings throughout the Borough. The dates and locations were as follows:
Landlord Forum

On 1st November Brent hosted a meeting of the Landlords Forum which is a non-profit making organisation of private landlords and agents who rent property in West London. Around 200 people attended and a presentation was given about the consultation, directions to the website to complete the survey online, and paper copies of the consultation given out. An email was sent out the following week to all attendees and members of the group, who did not attend, with a reminder of the consultation and how to take part. The event was held at Brent’s Civic Centre with Midas Property Club as our delivery partner and the bookings and registration hosted on the Eventbrite site.

Brent Housing Partnership and Brent Registered Providers Forums

A presentation on licensing titled “raising the standard in the private rented sector in Brent” was made to the Brent Housing Partnership, (BHP), an arms-length management organisations (ALMO) and community housing company owned by Brent Council at the Brent Registered Providers Forums on 28th September 2016 and later circulated to the forum members. The forum has a BHP reach of 12,500 and to all of the following housing associations: - Asra; A2dominion; Catalyst HG; Family mosaic; Genesis HA; HCHA; Hyde-housing; Metropolitan HT; Network HG; LQ group; NHHG; Octavia; Origin housing. A further meeting was attended on 7th December 2016.

Brent Connects

A total of three Brent Connect forum meetings were attended and a presentation given on the consultation. Brent Connect forums are regular meetings, covering five local areas and are an opportunity for residents to give their views on local issues and proposals and take part in consultations about the council’s activity. They are used as part of the local democracy process to help decide priorities and policies for Brent. At these meetings paper copies of the survey were available, and attendees were signposted to the website to complete an online survey.

Voluntary Sector Forum

A presentation on the consultation was made to the Brent Voluntary Sector Forum on 7 December, attended by 30 individuals.

Advertising van

During the week commencing 7 November an advertising van drove around the borough with a large advert for the consultation.
Yammer

Yammer is an internal social network for Brent employees. Of Brent’s 2,200 employees, 98% are signed up to the network. Two posts were made to the all company group, on 10/11/16 and 03/11/16.

Word of mouth

During the period of the consultation the private rented sector teams acted as ambassadors for the consultation, encouraging both employees and members of the public to take part. This was done either formally in team meetings or in general conversations with other teams throughout the council.

Evaluation of the Consultation

1.7 The table below shows the evaluation measures which were agreed.

<table>
<thead>
<tr>
<th>Evaluation measures agreed before campaign started</th>
<th>Additional evaluation measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Number of responses received</td>
<td>See separate tables for landlords and residents &amp; other stakeholders.</td>
</tr>
<tr>
<td>Target: 1,000</td>
<td>2 Number of Yammer posts and engagements</td>
</tr>
<tr>
<td>2 Number of news stories published in papers and online.</td>
<td>7 Number of rogue landlord news stories during campaign</td>
</tr>
<tr>
<td>12</td>
<td>8 Question in survey “How did you hear about the consultation?”</td>
</tr>
<tr>
<td>3 Emails and paper mail outs to landlords and stakeholders</td>
<td>9 Number of people completing survey at stalls at Civic Centre &amp; other locations.</td>
</tr>
<tr>
<td>7</td>
<td>10 Landlords forum – attendees (01/11/16)</td>
</tr>
<tr>
<td>12</td>
<td>11 Voluntary Sector Forum event attendees (07/12/16)</td>
</tr>
<tr>
<td>£2.23</td>
<td>12 Social media engagements face book &amp; twitter</td>
</tr>
<tr>
<td>5</td>
<td>13 Additional evaluation measures</td>
</tr>
<tr>
<td>6</td>
<td>14 Evaluation using the question in the consultation questionnaire</td>
</tr>
<tr>
<td>8 Question in survey “How did you hear about the consultation?”</td>
<td>1.8 Included in the consultation questionnaire was a question “How did you hear about the consultation?” The responses are in Figure 1 below. The clear leader in terms of successful reach is the leaflet with nearly 42% of all respondents naming this as how they had heard about the consultation. The Brent website (11.7%) emails (9.8%) and posters (8.2%) were all roughly similar after that. ‘The most popular ‘other’ response was through the in-store surveys and at the Civic Centre, with more than 50 people giving this answer.</td>
</tr>
</tbody>
</table>
Consultation responses

1.9  The volume of response to the consultation has been as follows:
- 1237 responses to the on-line and hard copy questionnaires, 23.7% over target the communications plan (see Appendix A for questionnaire results)
- 205 landlords/managing and managing agents and 853 residents (which includes 221 tenants living in private rented accommodation, 26%) and 147 “Other” stakeholders (the full demographic profile of respondents to the survey is outlined section 2)
- 11 individual letters/e-mails
- 4 written formal submissions from the National Landlords Association, the Residential Landlords Association, the National Approved Letting Scheme (NALs via the London Property Licensing), and from Home Safe Limited (see Appendix D for copies of the submissions).

Consultation Analysis and Reporting

1.10  The tables setting out the results from the consultation questionnaire are presented in Appendix E and these results have been analysed to identify any important differences in opinion (Appendix C). The results are presented by the following four categories:
- Overall responses
- Landlord/managing and managing agent responses
- Residents, tenants and businesses in Brent
- Other stakeholders

In addition, all the open-ended comments received in the questionnaire, plus written submissions and discussions from the various forums have been reviewed and key themes presented in the report.

The rest of the report is structured as follows:
- Section 2 outlines the results and findings from the consultation
• Section 3 outlines the other findings from the consultation questionnaire
• Section 4 findings from the other consultation activities and information such as the various meetings and forums
• Section 5, written submissions received
• Appendices, listed as A-E
Section 2: Questionnaire Survey Results

Introduction

2.1 A detailed breakdown of the questionnaire charts is provided in Appendix C to this report. Raw data tables are available elsewhere. This section presents summaries of the results from the questionnaire consultation survey, including:

- Demographic profile of respondents
- Response levels by respondent type, including neighbouring boroughs
- Rating of local problems in the local area
- Opinion on the management of the private rented sector as a whole in Brent
- Opinion on how the private rented sector as a whole in Brent might be improved
- Rating problems in relation to respondents homes or where they live in Brent
- Opinions on proposed selective licensing conditions
- Support for extending the selective licensing scheme
- Other comments received

The “About You” section of the questionnaire asked the respondent to state what capacity best describes them and therefore they were only able to choose one option. In the tables and charts the results are given as percentages so that the comparison could be made for different respondent groups.

Demographic profile of respondents to the consultation questionnaire

2.2 The consultation was promoted to different types of residents, landlords and other stakeholder groups. However this was an open consultation in which respondents self-selected to participate based on interest in the subject matter and there were no controls applied to make the survey demographically representative.

Table 1 presents the profile of respondents to the consultation questionnaire and compares this against the borough average where relevant. The first section of the table is dedicated to certain questions that are specific for the respondent type. It can be seen that the profile of respondents represents a broad mix across different community groups in relation to Brent:

| Question 2: Type/number of properties owned/managed in Brent: Single occupancy house |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|
| Responses                      | Landlords/ managing agents | Residents | Other stakeholders | Borough average |
| ['205', '853', '147', 'n/a']  | ['50%', '3%', '1%', '2%'] | ['1%'] | ['1%'] | ['1%'] |

Other comments received

The “Other comments received” section of the questionnaire provided space for respondents to comment on the consultation and the proposed selective licensing scheme. This section provides a selection of comments received along with the borough average where relevant.

Table 1 Demographic profile of respondents to the consultation questionnaire

<p>| Question 2: Type/number of properties owned/managed in Brent: Single occupancy house |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|
| Responses                      | Landlords/ managing agents | Residents | Other stakeholders | Borough average |
| ['205', '853', '147', 'n/a']  | ['50%', '3%', '1%', '2%'] | ['1%'] | ['1%'] | ['1%'] |</p>
<table>
<thead>
<tr>
<th>Self-contained flat</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>37%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 to 10</td>
<td>4%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 to 20</td>
<td>4%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21 to 50</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 to 100</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100+</td>
<td>3%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>50%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Houses in Multiple Occupation – smaller than three storeys</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>17%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 to 10</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 to 20</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21 to 50</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 to 100</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100+</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>78%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Houses in Multiple Occupation – three storeys or more</th>
<th>Landlords &amp; Man. Agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>9%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 to 10</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11 to 20</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21 to 50</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>51 to 100</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>100+</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>87%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Question 3:** Are you a member of any of the following? Please tick all that apply.

<table>
<thead>
<tr>
<th></th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Landlords Association (NLA)</td>
<td>19%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Residential Landlords Association (RLA)</td>
<td>13%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ARLA (Association of Residential Lettings Agents (ARLA)</td>
<td>8%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other landlord or lettings agent association</td>
<td>10%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>51%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Question 4: Are you an accredited landlord or agent?</td>
<td>Landlords and managing agents</td>
<td>Residents</td>
<td>Other stakeholders</td>
<td>Borough average</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Yes</td>
<td>20%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>78%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question12: How long have you owned a property or properties in Brent?</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than one year</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One to two years</td>
<td>4%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two to five years</td>
<td>11%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Five to ten years</td>
<td>22%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>More than ten years</td>
<td>47%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>11%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q10 - How long have you lived in Brent?</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than one year</td>
<td></td>
<td>3%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>One to two years</td>
<td></td>
<td>4%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two to five years</td>
<td></td>
<td>9%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Five to ten years</td>
<td></td>
<td>12%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>More than ten years</td>
<td></td>
<td>66%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prefer not to say</td>
<td></td>
<td>4%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td></td>
<td>2%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q11 - How long have you lived in your current property?</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than one year</td>
<td></td>
<td>5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>One to two years</td>
<td></td>
<td>7%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two to five years</td>
<td></td>
<td>15%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Five to ten years</td>
<td></td>
<td>13%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>More than ten years</td>
<td></td>
<td>53%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prefer not to say</td>
<td></td>
<td>5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td></td>
<td>3%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question1: Which of the following best describes</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Question 1: Who are you?</td>
<td>Managing agents</td>
<td>Residents</td>
<td>Other stakeholders</td>
<td>Borough average</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------------</td>
<td>-----------</td>
<td>--------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Work for a neighbouring local authority</td>
<td>6%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Resident in a neighbouring borough</td>
<td>69%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business owner in a neighbouring borough</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Landlord in neighbouring borough</td>
<td>6%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Managing or letting agent resident in neighbouring borough</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other interested party</td>
<td>14%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 2: I am based in...</th>
<th>Landlords</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Borough of Barnet</td>
<td>15%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London Borough of Camden</td>
<td>10%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London Borough of Ealing</td>
<td>8%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London Borough of Harrow</td>
<td>34%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London Borough of Hammersmith and Fulham</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Royal Borough of Kensington and Chelsea</td>
<td>1%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>London Borough of Westminster</td>
<td>4%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>26%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>0%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 13: Gender - are you</th>
<th>Landlords</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>57%</td>
<td>47%</td>
<td>54%</td>
<td>51%</td>
</tr>
<tr>
<td>Female</td>
<td>29%</td>
<td>42%</td>
<td>41%</td>
<td>49%</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>11%</td>
<td>8%</td>
<td>3%</td>
<td>n/a</td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td>3%</td>
<td>2%</td>
<td>n/a</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 14: What is your age group?</th>
<th>Landlords</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 18</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>23%</td>
</tr>
<tr>
<td>18 - 24</td>
<td>1%</td>
<td>2%</td>
<td>1%</td>
<td>9%</td>
</tr>
<tr>
<td>25 - 34</td>
<td>9%</td>
<td>14%</td>
<td>16%</td>
<td>20%</td>
</tr>
<tr>
<td>35 - 44</td>
<td>17%</td>
<td>19%</td>
<td>23%</td>
<td>15%</td>
</tr>
<tr>
<td>45 - 54</td>
<td>28%</td>
<td>21%</td>
<td>31%</td>
<td>12%</td>
</tr>
<tr>
<td>55 - 60</td>
<td>16%</td>
<td>10%</td>
<td>11%</td>
<td>6%</td>
</tr>
<tr>
<td>61+</td>
<td>17%</td>
<td>23%</td>
<td>12%</td>
<td>15%</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>10%</td>
<td>10%</td>
<td>5%</td>
<td>n/a</td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td>2%</td>
<td>1%</td>
<td>n/a</td>
</tr>
</tbody>
</table>
**Question 15: Do you have any long-standing illness, disability or infirmity?**

(Long-standing means anything that has troubled you over a period of time or that is likely to affect you over a period of time)

<table>
<thead>
<tr>
<th></th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>9%</td>
<td>13%</td>
<td>7%</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>82%</td>
<td>70%</td>
<td>88%</td>
<td></td>
</tr>
<tr>
<td>Prefer not to say</td>
<td></td>
<td>14%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>9%</td>
<td>4%</td>
<td>5%</td>
<td></td>
</tr>
</tbody>
</table>

**Question 16: How would you describe your ethnic background?**

<table>
<thead>
<tr>
<th></th>
<th>Landlords &amp; Man. agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>32%</td>
<td>44%</td>
<td>31%</td>
<td>36%</td>
</tr>
<tr>
<td>Mixed/multiple ethnic groups</td>
<td>3%</td>
<td>4%</td>
<td>3%</td>
<td>5%</td>
</tr>
<tr>
<td>Asian/Asian British</td>
<td>29%</td>
<td>20%</td>
<td>28%</td>
<td>34%</td>
</tr>
<tr>
<td>Black/African/Caribbean/Black British</td>
<td>3%</td>
<td>7%</td>
<td>16%</td>
<td>19%</td>
</tr>
<tr>
<td>Other ethnic group</td>
<td>2%</td>
<td>3%</td>
<td>3%</td>
<td>6%</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>25%</td>
<td>22%</td>
<td>16%</td>
<td>n/a</td>
</tr>
<tr>
<td>No Response</td>
<td>4%</td>
<td>2%</td>
<td>3%</td>
<td>n/a</td>
</tr>
</tbody>
</table>

**Question 17: What is your religion or belief?**

<table>
<thead>
<tr>
<th></th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buddhist</td>
<td>3%</td>
<td>1%</td>
<td>0%</td>
<td>1%</td>
</tr>
<tr>
<td>Christian</td>
<td>23%</td>
<td>31%</td>
<td>33%</td>
<td>41%</td>
</tr>
<tr>
<td>Hindu</td>
<td>20%</td>
<td>9%</td>
<td>14%</td>
<td>18%</td>
</tr>
<tr>
<td>Jewish</td>
<td>1%</td>
<td>2%</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>Muslim</td>
<td>6%</td>
<td>6%</td>
<td>13%</td>
<td>19%</td>
</tr>
<tr>
<td>Sikh</td>
<td>0%</td>
<td>1%</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>None</td>
<td>13%</td>
<td>17%</td>
<td>12%</td>
<td>11%</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>26%</td>
<td>27%</td>
<td>21%</td>
<td>7%</td>
</tr>
<tr>
<td>Other</td>
<td>2%</td>
<td>3%</td>
<td>3%</td>
<td>1%</td>
</tr>
<tr>
<td>No Response</td>
<td>4%</td>
<td>3%</td>
<td>1%</td>
<td>n/a</td>
</tr>
</tbody>
</table>

**Question 18: What is your sexual orientation?**

<table>
<thead>
<tr>
<th></th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heterosexual/straight</td>
<td>62%</td>
<td>65%</td>
<td>73%</td>
<td>97%</td>
</tr>
<tr>
<td>LGBT*</td>
<td>2%</td>
<td>2%</td>
<td>4%</td>
<td>3%</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>29%</td>
<td>28%</td>
<td>20%</td>
<td>n/a</td>
</tr>
<tr>
<td>No Response</td>
<td>6%</td>
<td>4%</td>
<td>3%</td>
<td>n/a</td>
</tr>
</tbody>
</table>

**Question 19: How did you hear about this**

<table>
<thead>
<tr>
<th></th>
<th>Landlords and</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>consultation?</td>
<td>managing agents</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------</td>
<td>-----------------</td>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Leaflet</td>
<td>23%</td>
<td>42%</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td>Poster</td>
<td>7%</td>
<td>8%</td>
<td>8%</td>
<td></td>
</tr>
<tr>
<td>Email</td>
<td>21%</td>
<td>10%</td>
<td>6%</td>
<td></td>
</tr>
<tr>
<td>Brent website</td>
<td>16%</td>
<td>12%</td>
<td>9%</td>
<td></td>
</tr>
<tr>
<td>Brent Connects</td>
<td>2%</td>
<td>2%</td>
<td>4%</td>
<td></td>
</tr>
<tr>
<td>Brent Citizens’ Panel</td>
<td>2%</td>
<td>1%</td>
<td>1%</td>
<td></td>
</tr>
<tr>
<td>Local newspaper</td>
<td>0%</td>
<td>2%</td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td>Word of mouth</td>
<td>12%</td>
<td>6%</td>
<td>14%</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>13%</td>
<td>16%</td>
<td>50%</td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>3%</td>
<td>2%</td>
<td>2%</td>
<td></td>
</tr>
</tbody>
</table>

*London average according to 2014 Integrated Household Survey the % of adults who are Gay, Lesbian or Bi-sexual was 2.6% in London

<table>
<thead>
<tr>
<th>Houses in Multiple Occupation – three storeys or more</th>
<th>Landlords/ managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 to 5</td>
<td>9%</td>
<td>0%</td>
<td>1%</td>
<td>1%</td>
</tr>
<tr>
<td>6 to 10</td>
<td>1%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
<tr>
<td>11 to 20</td>
<td>1%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
<tr>
<td>21 to 50</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
<tr>
<td>51 to 100</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
<tr>
<td>100+</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
<tr>
<td>No Response</td>
<td>87%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
</tr>
</tbody>
</table>

**Question 3: Are you a member of any of the following? Please tick all that apply.**

<table>
<thead>
<tr>
<th>Landlords and managing agents</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>National Landlords Association (NLA)</td>
<td>19%</td>
<td></td>
</tr>
<tr>
<td>Residential Landlords Association (RLA)</td>
<td>13%</td>
<td></td>
</tr>
<tr>
<td>ARLA (Association of Residential Lettings Agents (ARLA)</td>
<td>8%</td>
<td></td>
</tr>
<tr>
<td>Other landlord or lettings agent association</td>
<td>10%</td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>51%</td>
<td></td>
</tr>
</tbody>
</table>

**Question 4: Are you an accredited landlord or agent?**

<table>
<thead>
<tr>
<th>Landlords/ managing agents</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>20%</td>
<td></td>
</tr>
<tr>
<td>No</td>
<td>78%</td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td></td>
</tr>
</tbody>
</table>

**Question 12: How long have**

<table>
<thead>
<tr>
<th>Landlords</th>
<th>Residents</th>
<th>Other</th>
<th>Borough</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table 1 - Top line Demographic and Equalities Findings:

<table>
<thead>
<tr>
<th>you owned a property or properties in Brent?</th>
<th>Landlords and managing agents</th>
<th>Residents</th>
<th>Other stakeholders</th>
<th>Borough average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than one year</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>One to two years</td>
<td>4%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two to five years</td>
<td>11%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Five to ten years</td>
<td>22%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>More than ten years</td>
<td>47%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>11%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No Response</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Key Findings

2.3 Table 1 - Top line Demographic and Equalities Findings:

- 50% of landlords and managing agents responding own/manage fewer than 5 single occupancy houses in Brent with 37% owning or managing self-contained flats
- 50% of landlords responding are members of a landlords or letting agents association, while only 20% of the landlords or agents responding are accredited
- 17% of landlords have owned a property in Brent for less than 2 years. 69% have owned a property in Brent for more than 5 years (47% owning for more than 10 years)
- Overall, the equalities characteristics are representative of the borough averages with the notable exception of responses the 18-24 age group.

2.4 Response levels

- Each of residents, landlords and other stakeholders groups completed relatively large numbers of questionnaires with their interests being reasonably widely represented.

2.5 Local problems

- Notable proportions of both residents and of landlord’s rate enviro-crime, police reported crime, lack of community engagement, migration, problems with tenants as a problem. It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime.
2.6 Local solutions

- Although more residents are more likely to agree (89%) than landlords, significant few landlords disagreed that council should intervene and take control of the problems associated with high levels of ASB (16%)
- 71% of residents and other stakeholders at least tended to agree that the council should have more control over the way that landlords manage their properties. Landlords responded in almost opposite proportions with 68% at least tending to disagree
- Residents and other stakeholders agree (69.5%), but landlords disagree (74%) that the licensing scheme would help reduce anti-social behaviour

2.7 Selective Licensing conditions

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree

2.8 Support for extending selective licensing

- Overall a clear majority of respondents, mainly residents including tenants and other stakeholders agree with the council should extend selective licensing borough wide. While landlords are in almost equal opposition to extending licensing generally, where they agree they unanimously support a borough wide scheme

Response levels by respondent type, including neighbouring boroughs

2.9 Table 2 shows that each of residents, landlords and other stakeholders groups completed relatively large numbers of questionnaires. There are sub-groups stated for each category (see appendix) so as to recognise their opinions. As tenants are an important sub-group we have filtered the level of response (20.23%) for the group, but their views are submitted as part of the residents’ etc. questionnaire analysis. Appendix C provides a detailed breakdown for each respondent group.

In Figure 1(b) we have filtered the results further for tenants* and show 32% are tenants responses of which 26.55% are private sector tenants. Figure 1(b) shows a fair representation across Brent’s tenant tenure, with 63% from private sector tenants in single family dwellings.

Table 2(a)

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Responses</th>
<th>Per cent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residents, tenants* and businesses</td>
<td>853</td>
<td>70.7</td>
</tr>
<tr>
<td>Landlords and managing agents</td>
<td>205</td>
<td>17.0</td>
</tr>
<tr>
<td>Other stakeholders</td>
<td>147</td>
<td>14.3</td>
</tr>
<tr>
<td>Total</td>
<td>1205</td>
<td>100%</td>
</tr>
</tbody>
</table>
2.10 The results in table 2 above were filtered for tenants.

- Private tenant living in a single family dwelling (for example, a self-contained flat or house)
- Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (for example, toilet, bathroom, kitchen) with others
- Local authority (Brent Housing Partnership) tenant
- Housing association tenant

Local Problems: Rating of problems in the local area by residents and landlords

2.11 From figures 3a & 3b notable proportions of both residents and landlords rated enviro-crime; police reported crime, lack of community engagement, migration, problems with tenants as a problem. It is noted that the definition of antisocial behaviour includes enviro-crime and police reported crime.

- For Residents and landlords’ groups respectively, typically, rubbish dumping and fly tipping (65% & 78%) and untidy front gardens (71% and 68%) to be a problem
- A significant proportion of residents (28%) and of landlords (37%) indicated that street prostitution and brothels was a problem, though the majority stated that this was not a problem
- A significant majority of residents (60%) and of landlords (62%) indicated that police reported crime e.g. burglary in Brent was a problem.
- Levels of migration (63% residents/47%), tenants sub-letting (58% residents/54% landlords) as well as tenants not being aware of their legal responsibilities (62% of residents/46% of landlords) are seen as both groups as a problem.
- The response to lack of community engagement is an interesting one. 72% of residents and 56% of landlords rate this as a problem. It can be seen as being vital in assisting with a policy of involving local people to solve problems in their neighbourhoods and to taking a more local approach and responsibility.
Local Problems: Opinion on management of the private rented sector

2.12 These questions sought opinions as to what the extent of poorly maintained and poorly managed privately let properties were contributing to the decline of some areas in Brent and to the extent to which landlords were responsible and should be “fit and proper” persons to effectively manage their properties. (Figure 4)

- Overall the overwhelming majority of both groups (90%) agreed/tend to agree that landlords have a responsibility to manage their properties effectively, with a significant proportion agreeing strongly.
84% of residents and 70% of landlords agreed that landlord should be “fit and proper” persons to manage their properties. Although residents were more likely to agree to this statement, twice as many landlords (17%) than residents (9%) neither agreed nor disagreed with the statement.

Figure 4

Local Solutions: Opinion on how the PRS Brent might be improved

2.13 These questions were asked to all three stakeholder groups and sought opinions as to how the private rented sector in Brent might be improved, and to what the extent the council should intervene and take control of the problems associated with high levels of ASB, management and poor property conditions (Figure 5). Although more residents are more likely to agree than landlords, only 16% of landlords disagreed with the statement:

- Equal amounts of residents and other stakeholders (89%) significantly agreed that the council should intervene in areas suffering from high levels of ASB. A lesser amount of landlords (74%) but still the vast majority agreed with the statement, but over twice as many landlords (10%) neither agreed an disagreed compared to (4%) of residents. Figure 5a.

- Overall an average of 71% of residents and other stakeholders at least tended to agree that the council should have more control over the way that landlords manage their properties, with an average of 54% strongly agreeing and average 18% at least tending to disagree. Landlords responded in almost opposite
proportions with 19% agreeing and 68% at least tending to disagree, with 42% strongly disagreeing with the statement. Figure 5a.

**Figure 5 (a)**

![Bar chart showing responses to perceived problem](image)

Residents agree, but landlords disagree that the licensing scheme would help reduce anti-social behaviour

2.14 Potential for licensing of the PRS to reduce Anti-social Behaviour: Figure 5b

- An average of 69.5% of residents and other stakeholders at least tend to agree that the licensing scheme will help reduce anti-social behaviour, while 74% of landlords at least tending to disagree (of which 54% strongly disagreed).
- Residents were more likely than landlords to agree with this statement. For example, 67% of residents at least tended to agree compared to just 14% of landlords
• The majority of other stakeholders at least agree (72%), with 15% at least disagreeing.

Figure 5(b): Potential for licensing scheme to help reduce anti-social behaviour

Rating problems in relation to the respondent’s own home or where they live in Brent

2.15 Residents, tenants and Businesses Figures 6 and 6a:

A significant proportion of residents rated the problems associated to private renting as at least a problem. Rubbish dumping and fly-tipping was a problem. Whereas landlords (fig 6a), identified that the matters were a problem they rated them less seriously than residents, but rated problems of poorly managed and poor property conditions highest.
### Q2 - How would you rate the following problems in your local area?

<table>
<thead>
<tr>
<th>Problem</th>
<th>Very Serious Problem</th>
<th>Serious Problem</th>
<th>Minor Problem</th>
<th>Not a Problem</th>
<th>No Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rubbish dumping and fly tipping</td>
<td>39%</td>
<td>24%</td>
<td>22%</td>
<td>14%</td>
<td></td>
</tr>
<tr>
<td>High levels of overcrowded properties</td>
<td>27%</td>
<td>20%</td>
<td>20%</td>
<td>30%</td>
<td></td>
</tr>
<tr>
<td>Poorly managed and maintained homes</td>
<td>27%</td>
<td>18%</td>
<td>27%</td>
<td>25%</td>
<td></td>
</tr>
<tr>
<td>High rent levels</td>
<td>26%</td>
<td>20%</td>
<td>21%</td>
<td>27%</td>
<td></td>
</tr>
<tr>
<td>Untidy front gardens</td>
<td>26%</td>
<td>17%</td>
<td>28%</td>
<td>26%</td>
<td></td>
</tr>
<tr>
<td>Tenants being aware of their legal responsibilities</td>
<td>23%</td>
<td>19%</td>
<td>20%</td>
<td>31%</td>
<td></td>
</tr>
<tr>
<td>Levels of migration</td>
<td>23%</td>
<td>14%</td>
<td>24%</td>
<td>35%</td>
<td></td>
</tr>
<tr>
<td>Lack of community engagement</td>
<td>22%</td>
<td>24%</td>
<td>26%</td>
<td>23%</td>
<td></td>
</tr>
<tr>
<td>High turnover of residents in the local community</td>
<td>21%</td>
<td>20%</td>
<td>24%</td>
<td>32%</td>
<td></td>
</tr>
</tbody>
</table>

Consultation dates: 30 September 2016 – 16 December 2016
853 residents, tenants and businesses in Brent

Rating of problems cont’d – Landlords Figure 6a
Opinions on proposed selective licensing conditions

2.16 The questionnaire sought views on the proposed licensing conditions, displaying the mandatory conditions for all licences and stating that the full condition can be found at [www.brent.gov.uk/landlordlicensing](http://www.brent.gov.uk/landlordlicensing). The full list was also as an appendix in the proposal document. The respondents were asked “to what extent do you agree or disagree that the proposed selective licensing conditions above are reasonable?” Their responses are given in Figure 7.

If disagreeing, the respondents were then able to give their reasons in an open text box. The reasons are captured in Section 3 – Other comments received through the consultation questionnaire.

- Overall the licensing conditions proposed were at least tended to be agreed by an average of 63% of respondents, compared with average of 23% of the respondents tending to disagree.
- An overwhelming majority of residents and other stakeholders agreed or strongly agreed at 66% and 87% respectively.
- Landlords were least in agreement with 36% either tending to agree (21%) or strongly agreeing (15%).
- Landlords were most likely to disagree (47%) than the residents (15%). The main reasons landlords stated for disagreement were...

Figure 7: Agreement with proposed Selective Licensing Conditions
2.17 In tackling the problems, respondents were asked whether they agree or disagree with the council’s proposal to extend selective licensing in Brent – “yes or No”, and if agreeing, they were to give their opinion as to whether the scheme should apply borough wide or in other areas. Figure 8

If agreeing that licensing should be based in certain areas, the respondents were then able to specify location in an open text box. The reasons are captured in Section 3 – Other comments received through the consultation questionnaire.

2.18 Overall a clear majority (64.9%) of all respondents, mainly residents including tenants and other stakeholders agree that the council should extend selective licensing in Brent, while landlords were opposed to extending licensing generally, where they agree they unanimously support a borough wide scheme:

- Overall, 68% of residents and 70% of other stakeholders extending selective licensing borough wide in Brent. Of the 25.5% landlords who support extending licensing, they unanimously (22%) support the borough wide proposal
- Residents and other stakeholders were more likely than landlords to agree with the proposal. Figure 7 shows that a large majority all of residents (71%) and other stakeholders (76%) generally agree with the proposal to extend selective licensing in Brent, with 21% of residents and 12% of other stakeholders disagreeing.
- In almost mirroring contrast, 62% of landlords disagreed and 25.49% agreed with the proposal to extend. There was a significant 12% don’t know/no response from landlords.
- Where responses supported licensing but not borough wide, the total “please state” count was 6 and therefore there was insufficient further information regarding the any specific main locations and areas.

Figure 8: Should the Council extend selective licensing in Brent?
Tackling Problems: Would introducing selective licensing achieve any of the following?

2.19 Residents and landlords were asked their opinion on a number of statements in relation to what selective licensing would achieve. Respondents could select multiple responses. Based on the consultation questionnaire survey only a minority of landlords supported, but majority of residents, tenants and businesses of landlords supported the statements. The statements gaining the most support from residents and landlords respectively were to that licensing would “remove rogue landlords from the sector”, 68.35 and 27%, and “Allowing the council to take action against landlords who provide poor standards of accommodation”, 67.95% and 24.9% and provide safe homes for tenants to live in, 67.37% and 22.44%.

- Shifting the reliance away from using resident complaints to identify problems
- Promoting a professional management ethos amongst private landlords
- Providing tenants with consistent information on acceptable standards of accommodation
- Allowing the council to take action against landlords who provide poor standards of accommodation
- Removing rogue landlords from the sector
- Reducing anti-social behaviour in the borough
- Providing safe homes for tenants to live in
- Providing a better approach to managing the private rented sector
- Allowing the council to take action against landlords whose tenants cause persistent anti-social behaviour

Figure 9: Based on tables from Q9 of Residents questionnaire and Q10 of the Landlords questionnaire and expressed as frequency percentages
In your opinion, would introducing Selective Licensing achieve any of the following?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Residents</th>
<th>Landlords</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allow the council to take action against landlords whose tenants cause persistent anti-social behaviour</td>
<td>66.31%</td>
<td>11.22%</td>
</tr>
<tr>
<td>Provide a better approach to managing the private rented sector</td>
<td>60.70%</td>
<td>18.05%</td>
</tr>
<tr>
<td>Provide safe homes for tenants to live in</td>
<td>67.37%</td>
<td>24.88%</td>
</tr>
<tr>
<td>Reduce anti-social behaviour in the borough</td>
<td>55.32%</td>
<td>11.71%</td>
</tr>
<tr>
<td>Remove rogue landlords from the sector</td>
<td>67.95%</td>
<td>22.44%</td>
</tr>
<tr>
<td>Allow the council to take action against landlords who provide poor standards of accommodation</td>
<td>68.30%</td>
<td>27.32%</td>
</tr>
<tr>
<td>Provide tenants with consistent information on acceptable standards of accommodation</td>
<td>61.40%</td>
<td>16.10%</td>
</tr>
<tr>
<td>Promote a professional management ethos amongst private landlords</td>
<td>61.40%</td>
<td>17.07%</td>
</tr>
<tr>
<td>Shift the reliance away from using resident complaints to identify problems</td>
<td>49.59%</td>
<td>10.73%</td>
</tr>
</tbody>
</table>

Consultation dates: 30 September 2016 – 16 December 2016
Residents, tenants and businesses (855); Landlords and managing agents (205); Other stakeholders (147)
Section 3: Other comments received through the Licensing Questionnaire

Introduction

The questionnaire allowed respondents to be more specific or to give reasons in relation to these questions:
(1) Other matters which were problems in the local area (Residents and landlords)
(2) Why they might have disagreed with the proposed licensing conditions (All)
(3) If they wish to see selective licensing in place, but borough wide to specify where (All)
(4) Further comments regarding the proposal (Other Stakeholders only)

Additionally respondents provided general comments in submitting their questionnaire. These qualitative free text comments have been categorised in relation to themes and quantified in Table 3 for each group (figures in brackets are the number of respondents though not all provided additional comments\(^1\)) and also to show the number of times the issue was mentioned, where mentioned several times. Paragraphs 3.1 to 3.3 provided details of the comments made.

Table 3 below indicated that there were many free text responses and comments made, notably from landlords when expressed as a percentage of the groups responses. Most comments were in relation to licence conditions, followed by comments on licence fees, the impact of licensing on landlords and on the impact on tenants. To a much lesser degree respondents commented on the potential to improve PRS standards, noting that other measures to do so already exist. Comments were also made on the challenge to deliver licensing taking into account the amount bureaucracy thought to be involved.

Table 3: Questionnaire Comments - Emerging themes and issues

<table>
<thead>
<tr>
<th>Comment Themes (1207 Online Questionnaires analysed)</th>
<th>Landlords Managing Agents (205)</th>
<th>Residents, Tenants &amp; Businesses (855)</th>
<th>Stakeholders (147)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fees</td>
<td>66</td>
<td>70</td>
<td>3</td>
<td>139</td>
</tr>
<tr>
<td>Conditions</td>
<td>73</td>
<td>135</td>
<td>8</td>
<td>216</td>
</tr>
<tr>
<td>ASB and PRS evidence base</td>
<td>7</td>
<td>1</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Resourcing and Strategy/ Administration and Regulatory burden for the Council</td>
<td>14</td>
<td>6</td>
<td>1</td>
<td>21</td>
</tr>
<tr>
<td></td>
<td>8</td>
<td>4</td>
<td>1</td>
<td>13</td>
</tr>
<tr>
<td>Consultation/ Responsibility Scheme Implementation</td>
<td>10</td>
<td>12</td>
<td>0</td>
<td>22</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>2</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Proposal for a Borough wide scheme/Mechanisms already exist to deal with the problem/ Improving PRS standards</td>
<td>0</td>
<td>9</td>
<td>3</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>7</td>
<td>6</td>
<td>2</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>11</td>
<td>22</td>
<td>2</td>
<td>35</td>
</tr>
<tr>
<td>Impact on residents, notably tenants</td>
<td>40</td>
<td>59</td>
<td>3</td>
<td>102</td>
</tr>
<tr>
<td>Impact on landlords/The importance of managing agents</td>
<td>88</td>
<td>45</td>
<td>9</td>
<td>142</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>1</td>
<td>0</td>
<td>4</td>
</tr>
</tbody>
</table>

\(^1\) Only where an issue has been mentioned several times has it been included in the list above.
Specific questions and General comments - Residents, Tenants and Businesses

3.1 Licensing Conditions

- Questions raised about how the licensing conditions will be enforced, including whether the Council will have the resources to do this effectively

Fees

- Concern that the scheme is a money making enterprise for the Council
- Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases

General comments

- Support for the scheme as a means of making landlords more accountable and responsible
- The scheme should be focussed on rogue landlords rather than all landlords

Anti-social behaviour and the evidence base

- Calls for more police to address anti-social behaviour
- Calls for more community projects to help young people avoid engaging in anti-social behaviour
- Calls for better enforcement and use of existing powers, such as better planning enforcement
- Questions raised as to whether the licensing scheme would be effective at addressing anti-social behaviour

Specific questions and General comments - Landlords and Managing agents

3.2 Licensing Conditions

- Conditions will not improve standards
- Concerns that the scheme will create red tape for landlords

Fees

- Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases
- Concern that the scheme is a money making enterprise for the Council
- Calls to reduce fees

General comments

- The scheme should focus on rogue/problem landlords only
- Concern that rogue landlords will not apply and operate underground/outside of the scheme
- Concern that the scheme will push landlords out of the borough
- Questions asking what is in it/what are the benefits for landlords
- Increased rents cause overcrowding

Anti-social behaviour and the evidence base

- Would licensing be effective in addressing anti-social behaviour
- More police to reduce anti-social behaviour instead of introducing a licensing scheme
• Greater enforcement and use of existing powers to address anti-social behaviour instead of introducing a licensing scheme
• The scheme should focus on social landlords and their tenants which are considered to have greater anti-social behaviour problems
• Cannot blame landlords for anti-social behaviour
• Do not feel that the evidence base sufficiently proves the case for the need for a licensing scheme to address anti-social behaviour
• Greater help for landlords to evict tenants

Specific questions and General comments - Other Stakeholders

3.3

Licensing Conditions
• Questions as to why references are necessary / they are ineffective
• Will the Council have the resources to do this effectively

Fees
• Concern that landlords will pass costs of the scheme on to tenants in the form of rent increases

General comments
• Concerns that the scheme will create red tape for landlords
• The scheme should focus on rogue/problem landlords only
• This will dissuade landlords from renting privately and will reduce stock
• Scheme will achieve improvements where there is robust inspections

Summary of other comments received through the questionnaire

The respondents raised concerns about how the licensing conditions will be enforced, whether they would improve standards, that they would create red tape for landlords and about the council’s resources to enforce the conditions effectively. On the subject of fees it was felt that this was a money-making enterprise for the council and that costs will ultimately be passed on to the tenants. There were also calls to reduce fees.

There were other general comments and suggestions, such as giving support to tackling rogue landlords, the impact on landlords and on addressing on the anti-social behaviour problem. Robust inspections were seen as necessary to achieving scheme improvements.
Section 4: Findings from Forums and meetings

Introduction

4.1 This section presents the findings from other consultation activity undertaken during the consultation process. The purpose of these activities were to create awareness of the consultation, to test Brent’s proposals for extending selective licensing against landlords’ and other stakeholders’ opinions – to see the extent of acceptance or capability for development or amendment, and of course to supplement the quantitative consultation through questionnaires.

- One Landlord Forum event was held on the 1st November 2016 attended by approximately 200 participants (landlords were notified and invited to this event as part of the above direct mailings)
- Landlord and tenant representatives deliberative meeting
- Attendance at Brent Connect representing 3 forums (on average the attendance was 25-35 participants per forum)
- Attendances and presentation at Brent Housing Partnership/Registered Provider Forum

Overall the meetings sought to represent a cross section of residents, including private tenants, landlords and businesses in a face-to-face environment. Overall the forums probably over-represented landlords rather than private tenants, but it must be noted that individuals may have multiple stakeholder interests.

Each meeting began with an opening presentation or statement stating that Brent proposed to extend selective licensing, that a consultation was being run to find out what people think, and that we wanted people to “HAVE YOUR SAY”.

Generally, the introductions covered:
- The private rented sector in Brent – Growth and Impact
- The current position regarding licensing schemes in Brent
- The key consultation proposals
- The consultation process

In most cases the “Have your say” contributions were noted in order to capture detailed views or a balance of opinion from the meeting.

Brent Landlords Forum: 1 November 2016: Brent Civic Centre, 6-11p.m

Introduction

4.2 The Brent Landlords forum is a popular event hosted by Brent in partnership with the Midas Property Club. The event attracts a cross-section of landlords, agents, property investors and property services businesses. The event was widely publicised and promoted internally and externally via direct mail, social media, industry sector and dedicated websites. The forum attracted about 200 participants. We have tried to capture the issues raised, as well as the force of opinion as concisely as possible by assigning themes as shown below.
### Issues Raised

#### 4.3 Participants views about selective licensing in Brent

<table>
<thead>
<tr>
<th>Assigned Theme</th>
<th>Participants views about selective licensing in Brent</th>
</tr>
</thead>
</table>
| **General opposition to licensing** | - The majority of attendees clearly expressed that they were not in favour of licensing. Stating that in their opinion it is a money making scheme  
- Blanket licensing – Brent Council is building their own empire, money making scheme. I do not agree with it. There are other ways of controlling bad landlords  
- Landlords with HMO’s, in principle this works. However, my problem is, to licence all properties, how are you going to deal with this?  
- Compulsory licensing, compare this with controlled parking zones (CPZ). Introducing blanket licensing, I fear that it will follow the failure of CPZ’s  
- You don’t need a licence to target rogue landlords. Why have you not been targeting rogue landlords before bringing this in? |
| **Delivering the licensing scheme** | - How would we trust Brent Council to licence all private rented properties and how many would get licensed?  
- In general principle, we should not have to accept bad accommodations, but how do we trust the Council to deal with that?  
- You want 100% licensing, how are you going to find those people? How are you going to enforce that and what is your process? |
| **Anti-social behaviour (ASB)** | - With regards to ASB, all sorts of properties (tenures) are affected by this not just the private rented sector. Anti-social behaviour is mainly in council estates (applaud from attendees)  
- How does licensing stop ASB and fly tipping. As a landlord I cannot call up to get fly tipping taken away?  
- Landlords cannot access the free collection service, only tenants can and we cannot rely on tenants to do that and they may not. Can licensing address this problem?  
- We shall (do) have ASB, but why are you pointing that to PRS |
| **Impact on Landlords** | - You “come down” on good landlords  
- Keeping standards high. All this has done is to drive rogue landlords underground  
- Regardless of what landlords say you are going to do what you want  
- Good landlords pay for rogue landlords  
- This will cause good landlords to leave the PRS, exiting the market |
| **Fees** | - Fees just get fed in to the Councils coffers  
- If you inspect and find nothing wrong with property, why don’t you refund my fees?  
- Good landlords pay for rogue landlords  
- What happens to £540 over the three years, what happens with the money |
| **Supporting good landlords** | - Council should support landlords more. For example website lacking information and there is a need for improved clarity of information  
- Working in partnership, tenants go to the council to get advice about landlords. The council will advise them. What about advice for landlords. When you switch on the TV, all you hear about is rogue landlords. What about good landlords?  
- The importance of section 21 possession claims to selective licensing |
Balance of Opinion

4.4 The group demonstrated their specialist interest in the debate and presented cogent arguments with the six themes as listed above emerging. On balance, the forum was clearly against a blanket selective licensing scheme in principle, sceptical about its merits and delivery, but thought that this may be more appropriate for HMOs. In particular:

They questioned the council’s motive e.g. “money making”, and felt that efforts should be made to target rogue landlords before introducing licensing. If introduced, the group felt that it would be a huge challenge to identify properties, deal with the poor property conditions and to undertake enforcement against rogues, and therefore questioned the councils capacity to deliver the scheme, and, whilst not denying that ASB is a problem, that tenants and the council should do more to solve the problem and support good landlords rather than introducing licensing which will present additional economic burdens.

Landlord and Tenant Representatives meeting

Introduction

4.5 A total of 15 Landlord and tenant representatives were invited to a meeting by Brent at the Civic Centre on 8th December 2016. The organisations represented at the meeting were:

• Brent Advice for Renters (A4R)
• National Landlords Association (NLA) and
• Residential Landlords Association (RLA)

The meeting lasted for about two hours and the format was an open discussion led by Brent. The meeting opened with introductions followed by a summary of licensing in Brent. The rest of the time was dedicated to the debate on licensing and the representatives “having their say” on the proposals and giving examples and “alternative” views. The final session sought to get the balance of opinion on the specific consultation proposals for extending selective licensing as published.

The NLA and RLA are well known nationally. Advice4Renters (A4R) is the trading name of the former Brent Private Tenants Rights Group, a registered Charity organisation in London for private renters whose goal is to transform the private renting sector through their support and legal advice services for tenants, as well as through campaigning.

Issues Raised

4.6 During the main discussion period a number of important issues were raised by the representatives, including all of the following:

• Similar consultation meeting for tenants
• Political expectation in general on what property licensing will achieve and that licensing moves are often policy driven
• Massive growth of the PRS in London
• The landlords are concerned about the finance lender’s approach. Lenders see licensing as a risk to their investment because of the ASB stigma attached to licensed areas and that this is seen as a risk to the property value and leads to mortgages being rejected
• Change in landlords business models as a result of changes in mortgage interest relief e.g. change to a limited company, entry of cash buyers to the market
• The willingness of landlords to take LHA tenants
• That licensing highlights the existence of subletting and that landlords are sometimes victims of “subletting crime”. The example given highlighted the involvement ~ deliberate or otherwise, of the letting agent, head tenant and sub-tenants, the latter sometimes sleeping in shift patterns
• On the issue of enforcement, the representatives questioned the resources of councils to monitor and prosecute, and further noted the new powers which local authorities will have under the Planning and Housing Act 2016, in particular that councils will be able to retain fines from enforcement, and on the introduction of banning orders
• The above enforcement provisions will be available and in addition consideration should be given to utilising the existing management order provisions
• There is the view that Councils are “squirrelling” away licensing fee income. This is around concerns about reduced local government funding and that councils will be “bankrupt by 2020”
• Going forward, the funding of services is a challenge for politicians and presents a risk to the commitment to employ more licensing officers
• Consideration of using licensing fee for having better standards and also funding tenancy relation officer post from licensing. However a view expressed that this may be illegal. Licensing could be linked with public health intervention for the benefit of tenants
• Tenants referencing – view that referencing may be used maliciously
• The tenants led group supports licensing and favours a national scheme. Reflects that the onus is on the landlord to run their business properly
• Alternative PRS regulation – Doncaster has “half way house”
• Concerns that dealing with poor conditions is “slipping through the net” where Brent’s good landlords are paying for the bad landlords. This led to discussion around licence fee discounts for accredited members for which there was total support.
• Accreditation – Observation that there was a recent spike seen in Peterborough City Council where there is a heavy discount and that an option is to increase fee but discount (albeit legal opinion) more
• All landlords support criminal landlords being prosecuted and that the worst (approximately 3k) bad landlords should be targeted

Responses to consultation proposals
4.7 On the proposal to;
(a) extend selective licensing to all or some wards within Brent
Both representatives support extending selective licensing. However there was a different view from the landlord and tenant representatives in that the landlords favour extending to areas where there is a problem rather than blanketing and that to avoid a “cash cow” situation. Look at “hotspots”
The tenant’s representative supports extending selective licensing to the entire borough “because you know where you are and easier to manage”. Same standards will apply across
Examples of recent blanket or wide schemes mentioned were in Peterborough and Burnley and such scheme are subject to Secretary of State for DCLG confirmation

(b) That the existing designation which applies to Harlesden, Wembley Central and Willesden Green remains in force up to 31\textsuperscript{st} December 2019 – fully supported

(c) The consultation exercise - supported

If a scheme is applied, that it should be evidence based on ASB and one or several of the new criteria – supported

(d) Fee proposal – Recognition that the current basic licensing fee is low and should aim to keep the fee as low as possible by evidence led targeted inspections, giving notice to landlords, and when processing applications should maintain a presumption in favour of granting a licence.

Other comments

- Delays and investigations into processing licences should be evidence led e.g. complaint received
- Brent should consider what is realistic and licensing should be used as a “start of an education rather than the solution”.

Brent Connect meetings

Introduction

4.8 Brent Connect forums are regular meetings, covering five local areas and are an opportunity for residents to give their views on local issues and proposals and take part in consultations about the council’s activity. They are used as part of the local democracy process to help decide priorities and policies for Brent. Three forums fell due and were attended giving a coverage of 11 of the 21 wards in Brent;

- Brent Connects Harlesden, which covers the wards of Harlesden, Kensal Green and Stonebridge was attended on 26 October, 2016, 7-9pm
- Brent Connects Kingsbury and Kenton, which covers the wards of Barnhill, Fryent, Kenton and Queensbury, 16\textsuperscript{th} November 2016, 7pm, and
- Brent Connects Willesden, which covers the wards of Dollis Hill, Dudden Hill, Welsh Harp and Willesden Green – 9\textsuperscript{th} November 2016. 7pm. Total attendance = 48.

4.9 Issues raised at the Brent Connects Harlesden forum

- The ability and officer resources to follow through with inspections if the licensing is extended borough wide
- Identifying overcrowding
- Identifying the landlord
- The consideration of the 20% rule
- Dealing with beds in sheds
- Possibility of enforcing against property freeholders regarding disrepairs
Balance of opinion

4.10 Forum attendees were supportive of efforts to the problems being caused by private renting in Brent but needed to be assured that the council would be able to deliver licensing if extended.

Brent Housing Partnership and Brent Registered Providers Forums

4.11 Brent Housing Partnership (BHP) is an arms-length management organisations (ALMO) and community housing company owned by Brent Council. While the council owns the homes and takes responsibility for housing policy and strategy, BHP is responsible for the day-to-day management of housing services to over 9,500 council tenants and 3,000 leaseholders.

A presentation on licensing in Brent titled “raising the standard in the private rented sector” was made to the forum on 28th September 2016 and later circulated to the forum members. The forum includes all of the following housing associations: - Asra; A2dominion; Catalyst HG; Family mosaic; Genesis HA; HCHA; Hyde-housing; Metropolitan HT; Network HG; LQ group; NHHG; Octavia; Origin housing. A further meeting was attended on 7th December 2016.

Home Safe Scheme Limited meeting

Introduction

4.12 The Home Safe Scheme Ltd (www.thehomesafescheme.org.uk) is a private sector co-regulation partner organisation that was set up as a result of the implementation of a Selective Licensing schemes and now works with Doncaster MBC and West Lindsey District Council.

Two representatives from the Home safe scheme met at the Brent Civic Centre on 23rd December 2016. We acknowledged the written submission received, noting that we had not read through the paper and therefore this meeting was not a response. The meeting was to create an understanding of the scheme with a view to seeing whether it, or what features of it, may be applied to licensing in Brent.

The meeting lasted for about two hours and the format was an open discussion led by Brent. The meeting opened with introductions followed by a summary of licensing in Brent. It was clear that the concept was that of co-regulation to work alongside selective licensing. Reference was made to schemes at Doncaster MBC, Blackpool Borough Council and West Lindsey District Council as examples.

During the discussion period a number of important issues were raised by the representatives, including all of the following:
• Co-regulation concept – Selective licensing is still introduced and all landlords must obtain a licence from the council
• The Code of Practice
• Use of Charters- exploring through breach management action and response levels
• Compliance checks
• Benefits to landlords signing up to the Home safe scheme e.g. B&Q trade discounts, financial (Lloyds Bank) support, Nuffield Health membership
• What do landlords get for the fee? Need to consider methods such as process chains, value chain analysis, value (stream) mapping
• Co-regulation and licensing to How to create Process chain. The political expectation in general on what property licensing will achieve and that licensing moves are often policy driven
• Ways of supporting landlords
• Tenants Charter e.g. covering ASB where new tenants are encouraged to sign up
• Discounts on licensing fee implications
• Consideration of the scheme’s application to the London PRS context and in particular to the Brent existing PRS regulation
• Accreditation implications
• Home safe membership is voluntary but are there certain landlords/licensed applications where co-regulation could be targeted to, either as a licensing condition or to certain groups or sectors e.g. addressing public health, vulnerable tenants and private student accommodation.

Other comments
• The scheme could be tailored to Brent
• Scheme success - Doncaster MBC, one-year scheme review reported measured reduction in ASB, noise, housing complaints etc.,
• Next step could be a workshop to explore features that may be adopted
Section 5: Written submissions

Introduction

5.1 This section presents the findings from other consultation activity undertaken during the consultation process such as:
- 10 individual e-mails plus 1 letter emailed
- 4 written formal submissions from the, National Landlords Association, Residential Landlords Association, National Association of Letting Scheme and Home Safe Scheme Ltd. The formal written submissions are attached as appendices to this report with summaries below.

Summary of emails and letters

5.2 The views and opinions expressed in the various emails, letter and submissions were recorded. Any representations made were considered and captured as a bridging document as will form part of the Council’s formal response. As best as ascertained it appears that the respondents are a mix of residents, private tenants and landlords with over-dominance of any group.

Email comments
- Support for widening the scheme so that it applies to most or even all of Brent, notably to North Wembley and Sudbury
- Fees should be dramatically increased as other councils charge more
- It is not true that there are strong links between ASB and the privately rented properties
- Licensing makes the private renting business harder and does not solve poor property conditions
- For a variety of reasons stated, that the standard enforcement regime will be very complicated, time-consuming and expensive

Summaries of written submissions

National Landlords Association (NLA) submission summary

5.3 The NLA contends that there are flaws in the process and proposals which must be rectified prior to attempting to progress this application. Furthermore, once the necessary data has been identified and provided, this consultation exercise should be repeated (if permissible), ensuring engagement with all relevant stakeholders. The NLA’s position has been summarised by the following brief points:

- Landlords have very limited authority to deal with matters related to anti-social behaviour (ASB), especially if it happens outside the curtilage of the property.
- The scheme will lead to a further displacement of problem tenants in Brent/London.
- The documentation provided fails to indicate that sufficient funding will be available to support the functions necessary to support licensing in cases involving re-housing, tenants with mental health issues and social inclusion.
- Questions how will the Council prevent malicious ASB claims being made that could potentially result in tenants losing their tenancies?
Selective licensing is not a solution in itself – it does not tackle sub-letting or criminals.

However they state that the ability to introduce licensing is a powerful tool. If used correctly by Brent Council, it could resolve a number of specific issues, as has been seen in the three wards in which the scheme is currently running. The NLA has supported many local authorities when licensing schemes have been introduced that could benefit landlords, tenants and the community. But to extend the scheme Borough wide they believe is unjustified.

Residential Landlords Association (RLA) submission summary

5.4 The RLA believes that Brent is premature in bringing forward its proposals and should wait further given the new powers that will be made available to local authorities in the Housing and Planning Act 2016. The RLA’s submission opposing licensing based upon:

a) A number of general objections to licensing and,
b) Several areas of concern regarding to selective licensing.

Reasons for the general objections to licensing as cited in the appendix to their letter were:

- Licensing schemes rarely meet their objectives
- Rather than introduce a bureaucratic licensing scheme that will see staff time wasted processing applications, it should continue to direct its limited resources at effective enforcement activity.
- Tenant problems such as anti-social behaviour are impossible for the landlord to address alone and landlords will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere.
- The RLA does not believe Brent has made a robust case for borough-wide licensing.
- Concern that licensing costs are passed on to tenants in the form of rent increases and that, should the council decide to proceed, they welcome the consideration of discounted fees for landlords
- The RLA supports a system of self-regulation.

The areas of concern in regard to selective licensing relate to certain emerging trends such as the administrative burden, the use of the licence fees, tackling criminal landlords and proper systems for monitoring the schemes.

National Association of Letting Scheme (NALS) submission summary

5.5 NALS is an accrediting organisation for lettings and management agents in the private rented sector. NALS support the council’s wider objective around driving up standards and conditions in the private rented sector. They however suggest that based on the evidence that has been published, they do not think the case has been proved to extend selective licensing borough wide. They have however provided some technical advice as to how the proposals should be developed in order for a scheme decision to proceed. NALS express the following views and suggestions on Brent’s proposal including:

- The roll-out of new licensing schemes is the lack of consistency that this brings in the regulation of the private rented sector.
- Encourage the council to place any new scheme on hold given the government’s recent decision to expand the mandatory HMO licensing scheme in 2017.
• The new licensing scheme would need to be enforced using the same 'complicated, time-consuming and expensive' regime that the council is already finding problematic.
• Encouraged opportunities for co-regulation, better regulation of letting agents and stepping up of enforcement activity
• Welcome the proposal to offer an early bird discounted fee of £340. Overall, that the proposed application fee of £540 per property is less excessive than fees being charged elsewhere but should consider further fee discounting

Home Safe Scheme Limited submission summary

5.6 Home Safe Limited agrees that there is a problem with some private rented sector properties in Brent and commends Brent Council for having taken action to deal with this problem. As part of their business rationale Home safe supports selective licensing but proposes that Selective Licensing can be made effective by the mechanism of “Co-regulation”.

In outlining the merits and benefits of co-regulation, Home Safe argues that their alternative scheme will enable Brent Council to use their existing powers and resources more effectively and in a more targeted manner allowing them to focus those resources directly against the willingly bad, un-cooperative and non-complying landlords. They would, therefore, welcome the opportunity to work with Brent Council in developing a “Co-regulation” scheme for the relevant remaining wards.

Summary of other comments

5.7 These comments have been organised by the following themes:
• General comments
• Fees
• Licensing conditions
• Anti-social behaviour and the evidence base

5.8 Overall, the findings from these other consultation activities are very much in line with the comments and findings received through the consultation survey. In general terms, landlords generally expressed opposition and in some cases significant opposition to the proposals. There was limited support provided by a small number of residents and landlords and indicative support through a written submission (see appendix 3). The following outlines the details of some of the challenges and opposition.

General comments

• Concern that rogue landlords will not apply and operate underground/outside of the scheme, the expectation is that only good, compliant landlords will apply for a licence.
• The scheme should focus on rogue/problem landlords only and not penalise good landlords.
• Concern that the scheme will push landlords out of the borough, reducing the supply of private rented sector housing.

Fees

Note: Along with comments about anti-social behaviour and the evidence base, opposition to the proposed fee structure was the biggest area of challenge and comment.
• The fee is considered far too high for most landlords and there are calls to reduce fees.
• There are proposals to reduce the fee for compliant landlords and/or landlords working with reputable letting agencies.
• Proposals to charge fees in line with the size of the property/rent received and against the idea of a flat fee.
• Concern that the scheme is a money making enterprise for the Council.
• Some landlords and residents expect that the fee will be passed on to tenants, raising rental prices for tenants.

Note: The Residential Landlords Association’s (RLA) written submission presents a case against the consultation designation proposal, suggesting it could be challenged.

**Licensing Conditions**

• Questions raised about how the scheme will be enforced and the associated inspection regime, with suggestions that this could be unmanageable for the Council, landlords and tenants. There were concerns that the licensing scheme will not be effectively enforced and therefore fail to deal with rogue landlords or anti-social behaviour.
• Concerns that the scheme will create red tape for landlords, pushing up costs and making it less desirable to rent properties in the borough which could have a consequent impact on the supply of private rented housing.
• Concerns that there are too many licensing conditions.
• Concerns that some of the wording associated with licensing conditions is ambiguous and open to interpretation such as the definition and criteria for ‘fit and proper’ person.
• Do not believe that the licensing conditions will improve standards as most good landlords already comply and in some cases exceed the conditions.

The written submission from RLA provides detailed comments against each of the conditions and proposes alternative conditions.

**Anti-social behaviour**

Along with comments around fees, anti-social behaviour and comments about the evidence base were the biggest areas of challenge and comment.

• Greater enforcement and use of existing powers to address anti-social behaviour instead of introducing a licensing scheme such as use of Interim Management Orders (see National Landlords Association comments at appendix 3 for more detail).
• The scheme should focus on social landlords and their tenants which are considered to have greater anti-social behaviour problems than tenants of private rented properties.
• Some landlords do not believe that the licensing scheme will have a notable impact on anti-social behaviour as landlords are not responsible and should be blamed for anti-social behaviour.

**Evidence base**

The largest single number of comments and challenges were about the evidence base linking anti-social behaviour with private rented properties. These were as follows:

- The evidence base shows only correlation, not causation between private rented housing and anti-social behaviour
- Requests for further analysis of the evidence base to show if there are similar links between other housing types such as social housing and owner-occupiers, with the hypothesis that there are likely to be similar or more significant links between social housing in particular and anti-social behaviour.
- Contention that a blanket scheme is appropriate as anti-social behaviour levels differ between different parts of the borough, and so, if adopted should only be adopted for certain areas in the borough.