

APPENDIX 2



**RESPONSE TO CONSULTATION ON PROPOSALS TO EXTEND
LICENSING OF HOUSES IN MULTIPLE OCCUPATION (HMOs) IN
SOUTHAMPTON**

KEY FINDINGS

The consultation was approved by Cabinet on 21 August 2012 and ran for twelve weeks from 3 September 2012 to 26 November 2012 inclusive. The consultation was well-publicised and had a strong response from a broad range of interested parties, including landlords, landlord associations, Hampshire Fire and Rescue Service, residents and residents groups, tenants, universities and housing agencies. 231 questionnaires were returned, many with detailed comments, 11 written submissions were made, approximately 150 people attended three meetings arranged by the Council and landlords attended two forums arranged by landlords' associations.

Two thirds of questionnaire respondents agreed that licensing of all HMO landlords would improve Southampton's rented properties (66%). A very high percentage considered that poorly managed HMOs have a negative impact on their neighbourhood (81%), but a significant majority agreed that well managed HMOs have a positive impact (66%). A significant majority agreed that all HMO landlords should be licensed (69%) and that the council should be doing more to tackle HMO issues (79%).

The written submissions contained polarised views, with strong support for the proposals from tenants, residents, Hampshire Fire and Rescue Service and Hampshire Police and strong opposition from most (but not all) landlords and their representative organisations, the National Landlords Association, Southern Landlords Association and the Residential Landlords Association. Hampshire Fire and Rescue Service considers that additional licensing will increase the safety of residents and of the public and states that this is fully consistent with its strategic objective to "keep people safe". Hampshire Police stated that the proposals would assist their ability to deal with crime and anti social behaviour associated with HMOs, in particular in relation to Operation Fortress, which is targeting drug-related violence.

Landlords' associations considered the consultation to be flawed, that the use of existing powers and accreditation would better achieve the Council's objectives and consider there to be insufficient, inconclusive or out of date evidence to support the proposals for a city wide scheme. The Council's view is that the consultation fully met or exceeded all legal requirements, the continued use of existing powers and accreditation would not be as effective in tackling problems associated with HMOs and the evidence available supports the introduction of Additional Licensing in four wards. The universities were fully supportive and although the Southampton University Students Union considered that overall the proposals would help to ensure a large stock of high quality HMOs in the city, there was concern that sufficient frontline staff should be employed to carry out regular inspections and respond to complaints.

As a result of the consultation, the proposals have been amended as follows:

- The initial designation will be limited to four wards
- A decision on whether to extend the scheme will be made in 2016, following a full evaluation of the impact of additional licensing
- Landlords will be permitted to commission their own survey from an independent, approved surveyor to support a licence application
- HMOs with three or four occupiers will pay a reduced fee

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1. INTRODUCTION

This document sets out responses to Southampton City Council's consultation on its proposals to extend its licensing scheme for Houses in Multiple Occupation (HMOs), which was held between 3 September and 26 November 2012.

2. LEGAL REQUIREMENT TO CONSULT

Section 56(3) of the **Housing Act 2004** requires that:

Before making a designation [of an area subject to Additional Licensing] the authority must –

- (a) take reasonable steps to consult persons who are likely to be affected by the designation; and
- (b) consider any representations made in accordance with the consultation and not withdrawn.

The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval 2010 states:

The general approval ... is not given in relation to a designation in respect of which the Local Housing Authority has not consulted persons who are likely to be affected by it under section 56(3)(a) ... of the [Housing] Act [2004] for not less than 10 weeks.

Guidance published by the Department for Communities and Local Government in 2007 and updated in 2010, Approval Steps for Additional and Selective Licensing Designations in England, states:

LHAs [Local Housing Authorities] will be required to conduct a full consultation. This should include consultation of local residents, including tenants, landlords and where appropriate their managing agents and other members of the community who live or operate businesses or provide services within the proposed designation. It should also include local residents and those who operate businesses or provide services in the surrounding area outside of the proposed designation who will be affected. LHAs should ensure that the consultation is widely publicised using various channels of communication.

During consultation, LHAs must give a detailed explanation of the proposed designation, explaining the reasons for the designation, how it will tackle specific problems, the potential benefits etc. ...

Affected persons should be given adequate time to give their views, and these should all be considered and responded to.

Once the consultation has been completed the results should then be publicised and made available to the local community.

3. APPROACH

The consultation was approved by Southampton City Council's Cabinet on 21 August 2012 and ran for twelve weeks from 3 September 2012 to 26 November 2012 inclusive.

The consultation was publicised by a media release, which led to an article in a local newspaper, the Daily Echo, and items on BBC local television and radio news bulletins. Details of the consultation were published on the council's website and it was promoted using social media (Twitter).

Letters were sent to stakeholders, including 298 letters sent to local landlords and letting agents and 51 letters sent to residents' associations.

Presentations were given at two meetings hosted by local branches of the National Landlords Association and the Southern Landlords Association, which an estimated 100 landlords and lettings agents attended.

Two community meetings were held in areas of the city with high concentrations of HMOs, at Highfield Church Centre and at the Central Baptist Church, in the Polygon. A further public meeting was held at the Civic Centre. Although these meetings were not well attended (an estimated 50 people attended the three meetings), those attending had an opportunity to engage with staff from the council and give detailed feedback. Display boards with outlines of the proposals were put up at these meetings.

The public meeting in the Polygon was promoted as part of a multi agency targeted enforcement event held, known as Street CRED, which took place over three days. About 800 properties in the Polygon area received information about the public meeting and information about how residents could find out more and respond to the consultation.

Meetings were held with representatives from Southampton Solent University and the University of Southampton and a presentation and discussion took place at the Private Rented Accommodation Forum, which brings together landlords, housing agencies and others with an interest in housing homeless people and other vulnerable people in Southampton.

HMO licensing consultation response

The consultation documents consisted of a five page summary document written in plain English, outlining the proposals and their potential benefits. Further information, including evidence to support the proposals was published on the council's website.

Respondents were invited to complete a two page questionnaire (attached as Appendix A), which was designed to help structure responses and contained a space to capture general comments about the proposals. The questionnaire could also be completed online via the council's website.

4. RESULTS FROM THE QUESTIONNAIRE

231 questionnaires were completed online or in paper format and the responses are summarised in figure 1 below.

	Agree (%)	Disagree (%)
Licensing of all HMO landlords would improve Southampton's rented properties	66	31
The council should use its existing powers rather than extend its licensing scheme	42	46
Poorly managed HMOs have a negative impact on my neighbourhood	81	13
Well managed HMOs have a positive impact on my neighbourhood	66	20
Only landlords of larger HMOs should be licensed	26	65
All HMO landlords should be licensed	69	26
The council should be doing more to tackle issues associated with HMOs	79	13

Figure 1 Agreement or disagreement with the proposals

Two thirds of respondents agreed that licensing of all HMO landlords would improve Southampton's rented properties (66%). A very high percentage consider that poorly managed HMOs have a negative impact on their neighbourhood (81)%, but a significant majority agree that well managed HMOs have a positive impact (66%), so the issue appears to be with the management of HMOs rather than with HMOs in themselves.

A significant majority of respondents agreed that all HMO landlords should be licensed (69%) and most agreed that the council should be doing more to tackle issues associated with HMOs (79%).

Figure 2 below provides a further breakdown according to the type of respondent.

Figure 2 Breakdown of responses by respondent type

To what extent do you agree with the following?		Resident in Southampton					Business in Southampton		
		Owner occupier	Private tenant	HMO tenant	Student	All Residents	Landlord	Letting Agent	All Business
Licensing of all HMO landlords would improve Southampton's rented properties	Agree	82%	67%	60%	74%	79%	15%	33%	18%
	Disagree	17%	33%	40%	14%	19%	85%	67%	82%
The council should use its existing powers, rather than extend its licensing scheme	Agree	25%	53%	40%	46%	32%	85%	67%	82%
	Disagree	69%	29%	40%	26%	56%	13%	0%	11%
Poorly managed HMOs have a negative impact on my neighbourhood	Agree	91%	72%	80%	89%	89%	64%	44%	61%
	Disagree	6%	22%	20%	9%	9%	26%	56%	31%
Well managed HMOs have a positive impact on my neighbourhood	Agree	59%	78%	80%	94%	69%	74%	56%	71%
	Disagree	29%	11%	20%	3%	22%	19%	33%	21%
Only landlords of larger HMO properties should be licensed	Agree	17%	22%	20%	24%	19%	56%	78%	59%
	Disagree	81%	61%	60%	65%	75%	37%	11%	33%
All HMO landlords should be licensed	Agree	86%	56%	60%	88%	82%	21%	22%	21%
	Disagree	14%	33%	40%	0%	14%	79%	67%	77%
The council should be doing more to tackle issues associated with HMOs	Agree	89%	78%	80%	97%	89%	50%	56%	51%
	Disagree	7%	17%	20%	3%	8%	42%	22%	39%

HMO licensing consultation response

The questionnaire asked some further questions about the proposals for extending HMO licensing in Southampton. A full breakdown of the responses is given in figure 3 below.

A similar percentage agreed (44%) and disagreed (42%) with the proposals to phase the scheme in over five years. 11% of respondents to this question said that they did not know.

A significant majority (65%) agreed that the scheme should be funded through licence fees at no cost to the tax payer. 25% disagreed with this.

59% thought that the proposals will improve how HMOs are managed, 43% thought that the proposals would reduce noise, waste problems and other anti social behaviour and 61% thought that the proposals will make HMOs safer for tenants.

	Yes	No	Don't know	No reply
Do you agree with the proposals to phase in the scheme over five years?	44%	42%	11%	3%
Do you agree that the scheme should be funded by licence fees at no cost to the tax payer?	65%	26%	7%	2%
Do you think that the proposals will improve how HMOs are managed?	59%	29%	11%	1%
Do you think that the proposals will reduce noise, waste problems and other anti social behaviour?	43%	37%	18%	2%
Do you think that the proposals will make HMOs safer for tenants?	61%	26%	11%	3%

Figure 3 Agreement with proposals for extending HMO licensing

The questionnaire also asked how the Council should help landlords meet their responsibilities.

A very high percentage (72%) considered that the Council should provide training courses including on effective management and fire safety. It remains the Council's intention to do this in partnership wherever possible with landlords' associations, the fire and rescue service and other stakeholders.

52% agreed that there should be a voluntary accreditation scheme. The Council proposes to continue to support the SASSH accreditation scheme for student housing and to ensure that licensed properties automatically become eligible for accreditation, which could offer a marketing advantage to landlords. 73% considered that there should be better access to online information and 70% agree that there should be better integration between HMO licensing, SASSH and other initiatives.

HMO licensing consultation response

	Yes	No	Don't know	No reply
Training courses including effective management, fire safety etc.	72%	17%	7%	3%
Voluntary accreditation scheme	52%	34%	11%	3%
Better access to online information	73%	8%	14%	5%
Better integration of HMO licensing with other schemes, such as SASSH	70%	15%	9%	6%

Figure 4 How do you think the Council should help landlords meet their responsibilities?

The questionnaire listed some of the most complained about issues concerning HMOs and asked respondents to state to what extent they had been affected by these.

The results are given in figure 5 below.

<i>To what extent have these issues affected you?</i>	A lot	A little	Not at all	Don't know	No reply
Poor external appearance	43%	26%	29%	1%	0%
Noise nuisance, such as parties and loud music	23%	34%	39%	2%	2%
Dumped rubbish and litter around the properties	49%	22%	27%	1%	1%
Poor internal condition, such as disrepair, dirty, poor maintenance, unsafe	24%	15%	36%	21%	4%
Letting signs/boards up for a long period of time	41%	18%	38%	3%	1%

Figure 5 Extent to which HMO issues have affected respondents

5. SUMMARY OF RESULTS FROM DETAILED SUBMISSIONS

Eleven detailed written submissions were received from:

Hampshire Fire and Rescue Service

National Landlords Association

Southern Landlords Association

Residential Landlords Association

Chair or the local branch of the Southern Landlords Association

Member of the Executive Committee of Southern Landlords Association

Local builders and property management company

Private landlord

Friends of the Seven Streets (Residents Association)

Southampton University Students Union

A parent of a student privately renting in Southampton

The key points from these submissions are summarised below:

Hampshire Fire and Rescue Service (support)

- Facilitate closer partnership working and use of statutory powers by the Council and HFRS
- Improved information on smaller HMOs would enable more effective community risk reduction initiatives (including reducing arson)
- Increase safety of residents and of the public
- Fully consistent with HFRS strategic objectives and aligns with corporate objective of 'making life safer'

National Landlords Association (oppose)

- NLA represents 20,000 individual landlords from around the UK, with a local branch
- Consultation flawed
- Proposed scheme would be untargeted
- Additional costs to Council Tax payers
- Insufficient consideration of other courses of action
- Accreditation would better achieve objectives
- Additional costs would drive away good landlords which would limit supply and increase rents

Southern Landlords Association (oppose)

- Represents private landlords with a local branch
- Scheme would be unlawful as would not meet the requirements contained in the Housing Act 2004 and CLG guidance
- Consultation flawed
- Existing licensing hasn't worked

HMO licensing consultation response

- Insufficient, inconclusive or out of date supporting evidence, including survey conducted in 2008 and low numbers of other enforcement actions/prosecutions
- Accreditation would better achieve objectives
- Advocate use of existing powers
- Object to the proposed removal of the “surveyor route”

Residential Landlords Association (oppose)

- Flawed consultation as insufficient evidence provided
- Income generating scheme only
- Council already has adequate powers, which it should use
- Objectives need to be defined and how effectiveness will be monitored
- Training of landlords needs to be addressed
- Discount should be offered for members of landlord associations
- Inappropriate phasing
- Suggest opportunity to comment on later phases based on early experience

Chair of the local branch of Southern Landlords Association (opposes)

- Disproportionate
- Problem over-exaggerated due to vexatious complainants
- Flawed consultation
- Requirements for additional licensing not met in Southampton
- Housing conditions have changed since the 2008 survey, demand has increased due to the recession and university tuition fees and will be subject to further change due to welfare benefit changes
- Minimal enforcement action taken by the Council
- Existing powers should be used more vigorously, including Interim Management Orders
- If implemented, support “chartered surveyor route”
- A vibrant market is the best way to improve standards
- Licensing has not worked in Northern Ireland and this has adversely affected relationships between regulators and landlords
- Welfare benefit changes will result in additional supply pressures
- Better landlords will leave the market

Member of the Executive Committee of the Southern Landlords Association (opposes)

- Agreement should have been reached with SLA prior to public consultation, in recognition of previous effective partnership working
- Object to proposed withdrawal of surveyor route for property condition reports, as this benefits all parties
- Objection to not using the Local Government Association’s spreadsheet to calculate the proposed licensing fees (resulting in a significant and disproportionate increase)

HMO licensing consultation response

- Failure to consult on HMO amenity standards, which should take place and should not lead to “gold-plated” standards that increase rents
- The proposed scheme does not satisfy legal requirements, leaving the council open to legal challenge, which would be costly
- Danger that HMOs would be lost, increasing homelessness
- Licensing in Northern Ireland since 2004 and in Southampton since 2006 have been ineffective
- The additional licensing scheme in Oxford has only been in operation for a short time and should be evaluated prior to implementation in Southampton
- Improvements in HMOs are driven by the market and intervening in the market may disrupt this
- The sanction for dealing with landlords who cannot be licensed (Interim Management Orders) is ineffective and costly
- The council should use other, existing powers
- Licensing is excessively bureaucratic
- Existing arrangements for proactively targeting problem properties have not been implemented as envisaged
- The survey completed in 2008 is too out of date to be relied on, but in any case shows that standards in HMOs and non-HMOs are comparable and the private rented sector has less disrepair than the owner occupied sector
- Conditions have improved, as insulation has been fitted through grant schemes
- The ENTEC report “Fire Risk in HMOs” states certain shared houses are safer than properties occupied by a single household
- Council officers would not be properly trained or have sufficient experience to survey properties
- If approved, implementation of the scheme should be delayed
- The current mandatory licence application form should be retained
- A new large-scale stock condition survey should be carried out
- If approved, the scheme should be limited to the central and northern wards, not to the West and East of the city, where there are few HMOs
- HMOs with three people should be excluded from the proposals
- The Article 4 Direction should be repealed

Local builders and property management company (oppose)

- Conditions for licensing unmet
- Existing powers are sufficient and should be used
- Support RICS approved surveyors
- Increase in fees unjustified
- Supply of shared housing will be reduced, increasing rents

Private landlord (opposes)

- Unnecessary additional administration will not benefit landlords or tenants

HMO licensing consultation response

- Council should focus on other priorities and, in particular, economic development
- Standards can be improved by promoting the concept of “willing tenant, willing landlord” – tenants can choose to leave
- Use existing powers to investigate and deal with complaints
- No emphasis on “rogue tenants” and over-zealous, uncooperative council officers
- Empire building – concern costs and scope will increase

Friends of the Seven Streets Residents Association (support)

- Southampton has a high number of HMOs, clustered in certain areas of the city, and a significant proportion of these (42.7%) are not decent
- The poor condition of boundary walls and gardens, along with waste and other issues, has adversely affected the appearance and cohesion of neighbourhoods, with residents feeling disempowered
- The proposals will lead to landlords and tenants demonstrating an investment in and commitment to the areas in which HMOs are located
- Conditions will be improved for vulnerable, young and inexperienced tenants
- Support the proposal for the scheme to be funded by HMO landlords
- Voluntary accreditation is not considered to be a suitable alternative, as only the best landlords take part and even then self-certification has not worked with the SASSH scheme for student properties

Southampton University Students Union (qualified support)

- Overall, the proposals will help to ensure a large stock of high-quality HMOs in the city
- Sufficient frontline staff should be employed to ensure inspections are carried out regularly
- Concerned that the council will continue to fail to act swiftly when complaints about poor housing are made
- Lack of information about use of existing enforcement powers
- System of checking landlords are “fit and proper” must be robust
- Additional evidence needed to demonstrate how the proposals will reduce crime and anti social behaviour

Parent of a student renting privately in Southampton (support)

- Scheme must be adequately resourced to enable effective monitoring
- Scheme must be widely publicised
- Needed to improve quality of rented accommodation, which at the lower end of the market is “dreadful”

6. RESULTS FROM COMMUNITY MEETINGS

Notes from the Consultation event for extending HMO Licensing

Held at: Highfield Church Hall, Portswood.
Date: 3rd October 2012
Time: 5 until 8pm
SCC: Paul Juan, Claire Roberts, Deborah Vincent and Janet Hawkins
Attendees: 25 across the evening (members of the public including Cllr Vinson)

There were two presentations made and this generated much discussion and questions.

- Query about the definition of HMO, what if a Mum and Dad and their child lived in a property, would that count?
- Concern that the scheme will be relying on the honesty of Landlords coming forward to apply for a license.
- Does a landlord owning a property in the year 5 group automatically obtain C4 rights under the planning legislation?
- Query about planning appeals and housing legislation appeals, which decisions would take precedence?
- Are planning and housing definitions of HMO still different?
- Concern was raised about the costs of a license being passed onto students and their rents rising.
- Concern about being able to get to all properties to check if an HMO.
- Concern that 'good' landlords will make applications and 'rogue' landlords will not come forward.
- Query about how the additional powers will find properties where previous schemes have not worked for example registration and Mandatory Licensing.
- Concern raised about the funding of the scheme (for additional posts) are really just to provide extra income into the council on a 'nebulous premise'.
- Comment from a landlord who welcomed the scheme as would want her and her friend's children and grandchildren to live in safe rented housing.
- Comment that SCC and the Police are just passing their responsibilities and legal requirements (in terms of ASB) onto property owners.
- Comments made about the variable standard of letting agents, some are very good others less so.
- Concern raised about deposits for some tenants not being returned, suggested that membership of rent deposit scheme be included as a license condition.
- Comment made about students renting for the first time can be very naïve and don't always access advice and information from student unions.
- Reassurance sought from one person that the money would be spent on delivering HMO licensing not other SCC work.
- Query about why additional powers were needed as SCC already has powers to require the improvement of PRS home, why are they not using them?

HMO licensing consultation response

- Query about overcrowding in properties and who would be responsible for policing the number of people in a property and ultimately face prosecution?
- Query about what the sanctions would be for non compliance i.e. failing to make an application for a license.
- Concern about the changes to the Housing Benefit system and changes in the rules and the likely increase in the number of tenants of this type of housing.
- Query from a tenant who house shares with 2 other professionals whose experience was that they looked at and found ideal properties only to be told by the letting agents that they were not able to rent them because the owners were not going to be applying for a licence.

Notes from the Consultation event for extending HMO Licensing

Held at: Central Baptist Church
Date: 16th October 2012
Time: 10 until 8pm
SCC: Paul Juan, Claire Roberts, Deborah Vincent and Janet Hawkins
Attendees: variable across the day, around 12 all together excluding all Street Cred team briefed about the proposals prior to visiting remaining properties in the Polygon area.

There were 2 presentations scheduled for 4.00pm and 6.30pm however, the second did not take place as there was no one in the audience and the 4.00pm was only attended by 3 residents.

Residents were able to come any time between 10am and 8pm.

Discussion from the presentation and on an individual basis across the day:

Local resident from Kenilworth Road

- Supportive of the scheme
- Concerned about not being able to sell their property due to the planning restrictions (ratios of HMO and families perceived not to want to live there and HMO owners not able to convert so also will not want to buy)
- Has had experience of some good landlords i.e. they respond to issues positively.
- Wants to see the area improved and landlords take responsibility for their properties and tenants.

Local resident from Morris Road

- Very concerned about the planning changes that have been introduced due to fear of not being able to sell her home or if next door neighbour dies what would happen to that property, could it be converted into a student house without planning permission?
- Supportive of aims to improve the safety standard through licensing.

HMO licensing consultation response

- Has had to call the Police about incidents of ASB in the street outside property and has been troubled by noise from amplified music on several occasions over a number of years.
- Expressed a view that the improvement of these homes may increase the property values and rents and this would impact on the affordability of students to rent in the area, they may then go back to family homes?
- Poor student image is an issue.
- Believes that the universities have a role to play as well as landlords.

Other comments

- Recommend put notices in Sainsbury's (Portswood) and Libraries and in schools as area is overlooked, there are many HMO's in Lodge Road, Earls Road and Spear Road
- Issues with students queuing outside nightclubs and there are noise issues with going in and coming out.
- Issues with student areas, parties re ongoing, at one house one night and two doors down the next night etc.
- Some residents think that the area is like a student ghetto with no community feel
- Local residents re unable to sell, feeling vulnerable.
- Gardens are often unusable in the summer.
- Feel that there are 90% HMO in the Polygon area.
- Had problems with the Licensing panel and putting evidence across that people are moving from pubs to clubs and this has been recorded (video) but still not taken seriously.
- When asking tenants to quieten down at night they generally do but other areas with large gardens have parties ongoing all night and are sometimes not as responsive.
- Query about if planning is required for a 7 bed roomed HMO?
- Query if the number of HMO's is accurate as query if not nearer to 10,000 rather than 6,500 (across the city).
- Query about how SCC would go about finding out properties that are an HMO?
- Comment that some landlords would not want to have their details made available on a public register that could be accessed by HMRC.
- Question about if the scheme has been costed to ensure that it is deliverable?
- Comment that the fee is not high enough and should be linked to inflation to ensure that it can cover costs i.e. salary costs.
- Comment that we should maybe consider setting an annual fee instead?
- Question about the Council being able to remove a licence if the landlord is found after granting one to be not 'fit and proper'.
- Need to ensure that for any properties where a license is revoked that any tenants are not able to go onto the Housing Register as it is already under big pressure.
- Need to have a good system for fining and taking prosecutions for non compliance.
- Issues in the area with letting boards and the length of time they are up for.

HMO licensing consultation response

- Comment that sometimes the letting boards are useful as they provide the contact details of the managing agents if there are issues in the property.
- Concern about the standard of work/work quality accepted by landlords and would this be covered through licensing?
- Comment made that it is a short timescale for delivery.
- It would be a terrific improvement if the scheme is successful, good for tenants and residents
- Comment made that there are some good landlords and landlady's who are responsive and deal with issues that arise.
- Concern that some ASB cannot be controlled by landlords/landlady's in very difficult problem properties i.e. drug dealing/noise etc.
- Query if tenancy agreements are robust enough to solve problem tenants i.e. seeking possession if tenants do not abide by their requirements, what legally is there that can be done by the relevant bodies if they do not comply with tenancy agreements?
- Query about the effectiveness of the universities in resolving issues.
- Fear that some tenants are aware of their rights and some landlords are fearful of them.
- Eviction process can take a long time and cost money and so can make prohibitive?
- Query made about not putting a name and address on the consultation questionnaire could make the process open to abuse and there could be fraudulent submissions.
- Query about what other Local authorities are doing with additional licensing.
- Some residents do not have an issue with the students but with the property owners.
- In one part of the city there has been a community response to the issues of poorly maintained properties by having a Garden Gorilla scheme where they have completed work in HMO gardens to improve their appearance.
- The same part of the city also have a meet the street event at the start of every term and they then find it easier to approach students with issues such as noise.
- One resident commented that they would prefer to see Highfield included sooner rather than in year 2.
- Difficult to make comments about the fee levels but £500 would appear not to be very high for a 5 year licence.
- Question about the council being permitted to put the landlords email address on the public register?

Comments from a resident of Hill Lane and a local business owner

- License fee should be staggered as it will directly be passed onto tenants and 3 tenants would have to pay more than 6.
- Lets a property to an agent who sublets to 4 people, who would be responsible for applying for a license?
- Switching between family lets and letting to three people, how would this affect any license issued?
- What timescale would licenses need to be applied for?

HMO licensing consultation response

- Query if landlords would put up the rents immediately (need to check Oxford for their experience)
- Could base the fee on Council Tax banding as a sliding scale.
- Main problems:
 1. ASB poor education of tenants for consideration.
 2. litter
 3. Mattresses etc. dumped at the end of each year. Charge should be levied. Think that students are furnishing their own flat as a possibility.
 4. Rubbish collections are not sufficient and more bins are not the solution as the pavements are full. SCC should have an increased number of collections where it is necessary and a levy should be applied on student accommodation to pay for this.
 5. Do need a policing of issues heavily to start with to control and instil behaviour.
 6. Council has lost control of drinking policies and have allowed too many licensed properties selling alcohol and should stop giving licenses.
- Follow up years will also need to take on enforcement in previous years areas to ensure that any new HMO's are captured.

7. STREET CRED EVENT

Street Cred is an ongoing initiative involving council services and other agencies, such as the police and fire and rescue service. Small areas of the city are targeted for advice, information and, where necessary, enforcement action. These events, which typically last a day, have a focus on HMOs, crime and the environment.

Almost 800 properties in the Polygon area were visited by council officers and the police over three days in October 2012. The Blue Lamp Trust was also available to improve security, where appropriate.

The main focus of the event was to give students at the start of the academic year information about council services, such as arrangements for collecting waste and recycling, to encourage residents in the Polygon to show respect for neighbours by giving advice about how noise problems can be avoided and how they are dealt with, to give crime prevention advice and to collect information about property conditions.

Information was given out about the proposals to extend HMO licensing in Southampton and all residents, including students, were encouraged to fill in a questionnaire or to attend the public meeting. This information was included in a pack, which was left at properties when no-one was at home.

8. THE COUNCIL'S RESPONSE TO THE MAIN ISSUES RAISED DURING THE CONSULTATION

This section sets out the Council's response to the key issues that were most frequently highlighted in consultation responses.

- *The objectives for Additional Licensing need to be clearly defined*

The proposed scheme is designed to meet the following objectives:

- Keep occupants safe by ensuring the effective management of all HMOs
 - Improve living conditions by ensuring that appropriate facilities are provided
 - Improve housing standards and maintenance within HMOs, with a particular emphasis on security, fire safety and thermal comfort
 - Ensure that landlords exercise appropriate management and supervision of their properties to help reduce any adverse impact of HMOs on the neighbourhood and local communities
 - Build on and expand existing partnerships with landlords, managing agents, tenants, universities, community groups and others
 - Encourage and support owners and managing agents of HMOs to work proactively with the Council to achieve clearly defined standards and effective management
 - Facilitate stable and integrated communities through policy and the proactive targeting of risk-based and proportionate interventions
 - Reduce the number of complaints about HMOs received by the Council and its partners, such as universities and the fire service
 - Have no adverse effect on homelessness in the city
 - Ensure there is not an increase in the number of empty properties
- *The consultation was flawed*

All three Landlords Associations that responded considered that the consultation failed to meet the requirements set out in the Housing Act 2004 and associated guidance.

The Council's view is that the legal requirements to consult, as set out in detail in section 2 above, have been either met in full or exceeded by the approach detailed in section 3.

For example, consultation took place for a period of twelve weeks, which is in excess of the ten weeks required. The Council considers that it took "all reasonable steps to consult persons who are likely to be affected by the designation". The consultation was well publicised and information was available on the Council's website, was hand delivered to nearly 800

HMO licensing consultation response

properties, 350 letters were sent out to landlords and residents' associations and presentations were given at two landlords forums and three community meetings. In addition, meetings were held with other stakeholders, including the Private Rented Accommodation Forum, which includes housing agencies.

Consultation documents included a letter, a plain English guide setting out the proposals and their benefits, a questionnaire and a technical appendix could be downloaded from the Council's website. The Cabinet report authorising the consultation also contained additional information that was available on the Council's website.

Respondents had an opportunity to comment on the proposals in different ways, which have all been taken into account. These include – the questionnaire responses and comments; detailed written submissions; and comments made at landlords' forums, community and stakeholder meetings.

The Council has significantly amended its proposals in view of the consultation responses received and has published the results of the consultation.

- *The proposed scheme would be untargeted and would fail to meet the requirements for Additional Licensing set out in the Housing Act 2004*

In the light of consultation comments and following a further analysis of the information available on the number, condition and management of HMOs in Southampton, the proposals have been revised. It is now proposed that the four wards that make up the central and northern spine of the city, with the highest concentrations of HMOs, will comprise an initial designation.

The revised proposal reflects a more targeted approach advocated by some consultees and in the four wards proposed there is strong evidence that a significant proportion of the HMOs of that description in the area are being managed significantly ineffectively as to give rise, or to be likely to give rise, to one or more problems either for those occupying the HMOs or for members of the public. This is the key legal test contained in section 56(2) of the Housing Act 2004.

The Council is committed to evaluating the success of Additional Licensing in these four wards before making a decision on whether it would be effective in tackling problems associated with HMOs in other areas of the city, or across the entire city. A further consultation will be carried out, as appropriate, to inform any decision on whether to make any additional designations. The Residential Landlords Association in particular commented that this should be done.

- *Evidence base is out of date*

The Council completed a large-scale survey of housing conditions in privately owned and rented properties in 2008. This included a specific

report into conditions in HMOs, which has been taken into account. There are currently no plans to carry out a new survey and this is no longer recommended in government guidance.

The initial findings from the 2011 Census show that the size of the private rented sector has not changed significantly since the 2008 survey. Other sources of evidence, such as a record of the complaints that the council receives about HMOs have been considered, along with information on crime, anti social behaviour and fire.

The technical appendix containing a summary of the evidence has been updated with further information that was collected during the consultation period itself and this has been published separately.

Further details on the available evidence are given in section 9 below.

The Council considers that it is reasonable to rely on the evidence from the survey conducted in 2008, as this has been corroborated by more recent work and the initial findings from the 2011 Census.

- *Insufficient consideration of other courses of action – use of existing powers and, or, accreditation would better achieve the scheme’s objectives*

It is legal requirement that other courses of action are considered before designating an area as being subject to Additional Licensing and this has been considered in detail by an HMO Licensing Board established by the Council for this purpose. Various options have been evaluated and the outcome is summarised in the updated technical appendix, which has been published separately.

The Council disagrees that other courses of action would be more effective in dealing with the problems associated with HMOs in the designated area. Additional licensing would allow the Council to have a comprehensive approach to tackling problems, as it would have a complete database of properties, which would all be inspected during the period of the licence. The Council would have the ability to set specific licence conditions and to regulate those conditions, which would improve the management of HMOs where needed.

Crucially, the Council would have sufficient resources to regulate HMOs in the designated area, as the scheme would fund the staff required to inspect properties, ensure that licence conditions are complied with and take appropriate enforcement action swiftly, where necessary.

The Council has supported a voluntary accreditation scheme for HMOs occupied by students but remains unconvinced that accreditation provides an effective solution to improve management and conditions of properties in the worst condition. It is considered unlikely that non-compliant landlords will agree to join an accreditation scheme and, in any case, self-certification has not worked for the student scheme, where there are very

high failure rates when properties are inspected.

Some respondents have stated that existing mandatory licensing of HMOs has not worked and so additional licensing is also unlikely to work. Mandatory licensing applies only to an estimated 470 properties in Southampton, of which about 400 have been licensed. The vast majority of HMOs are not currently subject to any licensing requirements, including the estimated 4,500 properties in the four wards that form part of the revised proposal for the initial designation.

The Council's view is that its ability to license these properties, to ensure that an inspection is carried out to identify and deal with serious hazards, to ensure managers are "fit and proper" and to set and enforce licence conditions, will significantly improve standards in HMOs. In parts of the designated area, there would be whole streets of licensed HMOs, which would be patrolled by designated City Patrol Officers or HMO Wardens. The Council would have the legal resources, funded through the scheme, to support legal action where necessary to ensure minimum management and property condition standards are met.

- *Additional costs would drive landlords out of the market, would increase rents and homelessness*

The Council disagrees that the revised proposals to extend HMO licensing would have an adverse effect on the private rental market in Southampton and considers that the market will continue to be driven by a strong demand for HMO accommodation in the city.

The additional costs are considered to be reasonable and proportionate and, even if passed on in their entirety to tenants, are unlikely to result in any significant increase in rents. The Council considers that if landlords do chose to pass on the additional cost to tenants, then this is a price worth paying to improve standards in the sector overall and to live in a property that has been quality assured through the licensing process.

The Council is sensitive to the potential impact on homelessness and this will be kept under review by the HMO Licensing Board. Housing Agencies and the Council's Housing Needs Teams discussed this issue at a meeting of Southampton's Private Rented Accommodation Forum. It was acknowledged that agencies would be reassured by the fact that licensed properties would be verified as having attained a minimum standard for property conditions and management and this would assist when supporting vulnerable people seeking to rent privately.

An initial evaluation of Oxford City Council's Additional Licensing Scheme has not shown any adverse impacts on homelessness or rents. This is because other factors in the market influence rents, principally the number of first time buyers who rent because they cannot afford to buy. Although some HMO landlords chose to leave the market, their properties have been bought by other HMO landlords, so supply of this type of accommodation has not been reduced.

However, the impact of licensing on standards within HMOs in Oxford is significant. The decision to inspect every HMO prior to issuing a licence has proven valuable with very few HMOs being found to be fully compliant with national minimum standards. The House Condition Survey of 2005 estimated that 70% of Oxford's HMOs were non-compliant, but to date, over 90% of HMOs inspected there have required additional conditions on the licence to secure compliance. The primary cause for additional licence conditions is improving fire precautions to the minimum standards required by national guidance.

- *Comments about how the scheme would be run – concerns that it would be unnecessarily bureaucratic, that the “surveyor route” would be removed, that additional information would be required as part of the application process and that the costs would not be calculated fairly*

The Council aims for the proposed scheme to be administered as efficiently as possible and will build on the progress made with the mandatory scheme to make it streamlined and “business-friendly”.

Comments about the proposed removal of the “surveyor route”, where landlords are able to commission their own survey from an approved, independent surveyor, are accepted and the proposals have been amended to retain licence applicants’ ability to do this for a reduced fee.

The proposed fees have been calculated by the Council’s finance team and will be set at a level that is reasonably expected to cover the costs of providing the service based on estimated officer time and associated costs involved in processing the applications, inspections, monitoring and enforcement as well as relevant overheads. A higher or “penalty fee” is proposed for non-compliant landlords, in common with the current mandatory licensing scheme. Taking into account comments made during the consultation, a sliding scale of fees is proposed, with lower fees for properties occupied by three or four people.

Section 63(3) of the Housing Act 2004 states that the Council, “may, in particular, require the application [for an HMO licence] to be accompanied by a fee fixed by the authority.” No Regulations have been made under the Housing Act 2004 that specify the maximum fees that are to be charged. However, section 63(7) of the Housing Act 2004 will be complied with:

“When fixing fees under this section, the local housing authority may (subject to any regulations made under subsection (5)) take into account—
(a) all costs incurred by the authority in carrying out their functions under this Part, and
(b) all costs incurred by them in carrying out their functions under Chapter 1 of Part 4 in relation to HMOs (so far as they are not recoverable under or by virtue of any provision of that Chapter).”

The Council proposes to consult with interested parties on any revisions required to its HMO amenity standards.

9. DETAILED FEEDBACK TO SUMMARY COMMENTS SUBMITTED BY SOUTHERN LANDLORDS ASSOCIATION

Southern Landlords' Association's view	Southampton City Council's response
<ul style="list-style-type: none"><li data-bbox="231 405 794 448">• Not lawful <p data-bbox="231 481 794 627">It is our view that the requirements of the Housing Act 2004 have not been met by the proposed scheme, and that it is therefore unlawful.</p>	<p data-bbox="794 405 1361 627">The revised proposal to designate Bargate, Bevois, Portswood and Swaythling wards as being subject to additional licensing meets all of the requirements of sections 56 and 57 of the Housing Act 2004.</p> <p data-bbox="794 660 1361 963">In particular, the authority considers that a significant proportion of HMOs in those wards are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public [section 56(2)].</p> <p data-bbox="794 996 1361 1220">The authority has taken reasonable steps to consult persons who are likely to be affected by the designation and have considered representations made in accordance with the consultation [section 56(3)].</p> <p data-bbox="794 1254 1361 1601">The proposal is consistent with the authority's overall housing strategy [section 57(2)] and the authority will continue to seek to adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti social behaviour [section 57(3)] through its HMO Licensing Board.</p> <p data-bbox="794 1635 1361 1836">The authority has considered other options available to it [section 57(4)(a)] and a summary of this Options Appraisal will be published in an updated HMO Licensing Report.</p> <p data-bbox="794 1870 1361 2058">The authority considers that making the designation will significantly assist them to deal with the problems identified with HMOs in the designated area [section 57(4)(b)].</p>

Southern Landlords' Association's view

- **Existing licensing hasn't worked**

Licensing and registration have been in operation in the Polygon and Freemantle since 1997. Almost nobody believes that this has made any difference whatsoever.

Southampton City Council's response

These schemes have not had the reach that the proposed Additional Licensing Scheme would have in the designated area.

The Polygon and Freemantle Registration scheme was a notification scheme and although approximately 800 properties were registered through the scheme, its coverage was hindered by the decision made in the landmark Sheffield City Council v Barnes case in 1995, which determined that students living in a property on a single tenancy agreement was not an HMO in law. (The Housing Act 2004 introduced a new definition of an HMO which now includes properties let in this way.) Landlords paid a fee of £40 to register their properties and the council did not have the ability to apply licence conditions nor the resources to complete a full survey of registered properties.

Mandatory licensing of HMOs introduced in 2006 by the Housing Act 2004 applies only to an estimated 470 properties in Southampton. The proposed scheme will have comprehensive coverage of HMOs in the designated area, which will enable the council to deal more robustly and effectively with problems associated with HMOs by inspecting them and setting and enforcing licence conditions. This would include specific patrols of areas with high densities of HMOs, which would all require a licence.

The proposed scheme will give the council sufficient resources to ensure that management and property standards meet the required levels. Mandatory licensing alone is not considered sufficient to achieve this.

Southern Landlords' Association's view

- **In 2007 CLG refused Southampton permission to go ahead with an additional licensing scheme**

The same evidence base as before is necessary, however, and the same detail as before is missing.

- **So many perceived problems – so few prosecutions**

We are told that there are many problems but over the years the council has decided that almost none of these problems are serious enough to prosecute. This strongly suggests that the problems now reported are exaggerated.

Southampton City Council's response

No application has been made by the council at any time to the Secretary of State or to the Department for Communities and Local Government for permission to go ahead with an additional licensing scheme.

Such permission is no longer necessary, following a General Approval issued in 2010, subject to a consultation with interested persons lasting not less than ten weeks (the council's consultation on the proposals took place for 12 weeks).

The council acknowledges that there have been too few prosecutions.

Its enforcement policy states that the council will work with landlords to secure improvements to management and conditions wherever possible and council interventions have secured some significant improvements in individual properties in this way.

The council is currently prosecuting a landlord for serious breaches of the Housing Act 2004. The landlord pleaded "not guilty" to these offences at a hearing on 17 January 2013 and the matter will proceed to a full hearing in March 2013.

A significant advantage of the proposed scheme is that it will fund a dedicated solicitor to work alongside Environmental Health staff which will enable the worst cases of poor management and conditions to be prosecuted swiftly.

Southern Landlords' Association's view

Southampton City Council's response

• **Counterproductive**

Licensing 7,000 properties will be a massive box ticking exercise and a distraction from targeting bad properties, bad tenants and bad landlords. Result: rogue landlords will be able to get away with unfit properties for longer periods and more tenants will be able to engage in anti social behaviour and remain unchallenged.

The council disagrees that the proposals will be counterproductive, but acknowledges that the scheme should deal with compliant landlords as swiftly and effectively as possible whilst focussing its enforcement resources on criminal landlords.

Where properties are identified as having serious failures of management or conditions, they will be passed to an enforcement contingent that will deal with the issues robustly.

Requiring all HMOs in an area to be licensed will make it easier to identify individual problem properties and, crucially, the scheme will give the council the resources it needs to effectively regulate this sector.

Discovering less responsible landlords is not easy because some tenants are worried about eviction and will not make a complaint, or do not know that they are able to make a complaint. Proactive licensing should resolve this.

• **Information base used to justify action is out of date (2008 Housing Survey)**

The most common reason (65.6%) for a 'category 1' (major) hazard in HMO is fire risk. Fire safety standard was based upon LACORS guidance which was published *weeks* before the survey fieldwork. *Implementation of this standard is now very high and a new survey would show this to be the case.*

The council considers that it is reasonable to use information obtained as part of its large-scale sample survey of privately owned and rented housing in Southampton carried out in 2008. There are currently no plans to repeat a survey of this nature.

Information recently published as part of the 2011 Census suggests that the size of the private rented sector has remained relatively constant since 2008. The Census reported that 24.9% of households rent privately, compared with a figure of 24% in the 2008 survey.

Southern Landlords' Association's view

- **Information base used to justify action is out of date (2008 Housing Survey)**

(continued)

Southampton City Council's response

Surveyors in 2008 took into account the requirements of the LACORS guidance, which adopts a risk-based approach to fire safety standards, which is consistent with the use of the Housing Health and Safety Rating System.

The council acknowledges that landlords of HMOs licensed under the mandatory scheme have worked with the council and Hampshire Fire and Rescue Service, where applicable, to ensure that the requirements contained in the LACORS guidance are met.

However, an analysis of service requests received by the Environmental Health Housing Team between 3 September and 26 November 2012 shows that the most commonly identified category 1 hazard in HMOs is still fire safety (54% of category 1 hazards identified – 14 out of 26).

The survey carried out in 2008 estimated that an average of 89% of HMOs failed to comply with HMO management regulations. In HMOs, during the period between 3 September and 26 November 2012, the Environmental Health Housing team identified 42 breaches of the regulation requiring a manager to take safety measures, 45 breaches of the regulation requiring a manager to maintain common parts, fixtures, fittings and appliances and 28 breaches of the regulation requiring a manager to maintain living accommodation.

The council considers that there is sufficient evidence, taking into account the 2008 survey and other sources, to satisfy the test contained in section 56(2) of the Housing Act

Southern Landlords' Association's view

- **Information base used to justify action is out of date (2008 Housing Survey)**

(continued)

- **Licensing does not tackle anti-social behaviour**

The vast majority of anti-social behaviour is neither committed on or near the curtilage of HMOs. Only more strenuous enforcement of existing legislation can tackle this problem.

Southampton City Council's response

2004, that a significant proportion of HMOs in those wards are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the HMOs or for members of the public.

HMO licensing is considered a useful tool to help deal with anti social behaviour. For example, licence conditions can require a landlord to issue a code of conduct for tenants. A disproportionately high number of complaints about noise nuisance in HMOs are currently investigated by the council's daytime and out of hours noise service.

A comprehensive database of licensed HMOs in the designated area will assist the council with taking appropriate action using existing powers, for example using the Environmental Protection Act 1990 as amended and the Management of Houses in Multiple Occupation (England) Regulations 2006, which place duties on both managers and tenants.

This database can also be used to effectively target advice and information to landlords and tenants on noise and anti social behaviour issues.

The council will have additional resources, funded through the proposed licensing scheme, to deal with allegations of anti social behaviour associated with HMOs. The council's City Patrol, will focus on licensed HMOs and will include an additional member of staff for this purpose, funded by the scheme.

Southern Landlords' Association's view

- **Bournemouth City Council decides additional licensing is not the solution**

Bournemouth have decided after consultation and 'lessons from other local authorities' that additional licensing is not the answer and will instead use more strenuous enforcement of existing legislation coupled with a voluntary accreditation scheme with a code of conduct.

Southampton City Council's response

Any decision to implement an additional licensing scheme has to be determined according to local circumstances and taking into account the results of consultation.

It would not be appropriate for Southampton City Council to critique Bournemouth's approach and decision on this matter.

The council operates a voluntary accreditation scheme for student accommodation (SASSH) in partnership with the universities and other agencies. Staff from the Environmental Health Housing Team carry out checks of 5% of accredited properties each year to determine whether the advertised standards are being met. For the academic year 2011/12, only one of the 24 properties inspected was deemed to meet the standards, as declared by the landlord.

Brighton and Hove City Council decided to implement an additional licensing scheme in five wards from 5 November 2012 for a period of five years, which requires all HMOs in those areas to be licensed. In many ways the problems faced in Brighton and Hove are similar to those faced in Southampton.

Oxford City Council has successfully implemented a scheme covering the entire city, which, following a recent evaluation, has not adversely affected rent levels, housing supply or homelessness.

More strenuous enforcement of existing legislation will only be possible in Southampton with additional staff funded through the proposed scheme.

Southern Landlords' Association's view

- **Proposed alterations to the Mandatory HMO Licensing Scheme for properties of three storeys or more are very unwelcome.**

In particular, abolition of the 'Chartered Surveyor Route' is a backward step. It means that properties which **had** to be free of hazards and disrepair **before** a Licence was granted (as confirmed by a Council approved Chartered Surveyor) would now have to be granted a licence even if there were significant hazards or disrepair present. As a consequence of this the Licence would be granted anyway, merely with conditions requiring problems to be rectified by some specified time in the future. This means that tenants will be required to live in a potentially unsafe property for a not insignificant period of time after it becomes licensed. In addition to this, property inspections would not now be carried out by a Chartered Surveyor with many years of qualifications and training to inform their findings, but instead by Council Officers, potentially with no background or experience in housing issues other than having attended a two day course on the Housing Health and Safety Rating System.

Southampton City Council's response

The council has taken on board the comments made about this and the revised proposal retains a landlord's ability to submit a report from an approved, independent surveyor as part of their licence application. It is the council's intention to inspect as many properties as possible prior to the issue of a licence, although it accepts that this may not always be possible, in which case it will adopt a risk-based approach. The legal requirement is to determine that a property is free from category 1 hazards during the life of the licence.

The council acknowledges the contribution that independent surveyors can make to delivering a successful licensing scheme, although there is currently limited capacity for this, as only two surveyors are currently approved for this purpose, although the number is expected to increase. The council acknowledges that some landlords value the ability to commission their own survey as part of a programmed approach to property improvement and maintenance.

All council staff undertaking licensing surveys will have the appropriate skills, knowledge and experience required and complex properties or those requiring enforcement action will be allocated to the most experienced officers. Systems and management controls will be in place to ensure staff adopt a consistent, risk-based and proportionate approach. The use of independent surveyors will continue to be subject to safeguards and, in all cases, the ultimate responsibility for ensuring the property is safe and well-managed rests with the licence holder.

CONSULTATION ON PROPOSALS TO EXTEND LICENSING OF HOUSES IN MULTIPLE OCCUPATION (HMOs) IN SOUTHAMPTON

Please read the consultation proposal document prior to completing the questionnaire.

The information collected will only be used for HMO Licensing Consultation.

Please tick the appropriate box or comment as appropriate.

1. Which of the following best describes you?

Resident in Southampton:

- Owner occupier
- Private tenant
- HMO tenant (shared house/bedsits)
- Student
- Other (please state) _____

Business in Southampton:

- Landlord
- Letting / Managing Agent
- Other (please state)

2. Please state your postcode:

Or the area(s) of the City in which your business predominately operates:

3. Below is a list of some of the most complained about issues with HMOs last year, to what extent have each of these affected you?

	A lot	A little	Not at all	Don't know
• Poor external appearance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Noise nuisance, such as parties and loud music	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Dumped rubbish and litter around the properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Poor internal condition, such as disrepair, dirty, poor maintenance, unsafe	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Letting signs / boards up for long periods of time	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. To what extent do you agree with the following?

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
• Licensing of all HMO landlords would improve Southampton's rented properties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• The council should use its existing powers, rather than extend its licensing scheme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Poorly managed HMOs have a negative impact on my neighbourhood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Well managed HMOs have a positive impact on my neighbourhood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Only landlords of larger HMO properties should be licensed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• All HMO landlords should be licensed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• The council should be doing more to tackle issues associated with HMOs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

→ *If you agree or strongly agree what issues should be addressed?*

5. Thinking about the proposals for extending HMO licensing in Southampton:

	Yes	No	Don't know
• Do you agree with the proposals to phase in the scheme over five years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Do you agree that the scheme should be funded through licence fees, at no cost to the taxpayer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Do you think that the proposals will improve how HMOs are managed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Do you think that the proposals will reduce noise, waste problems and other anti-social behaviour?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Do you think that the proposals will make HMOs safer for tenants?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. How do you think the council should help landlords meet their responsibilities?

	Yes	No	Don't know
• Training courses including effective management, fire safety etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Voluntary accreditation scheme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Better access to online information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Better integration of HMO licensing with other schemes, such as SASSH (Southampton Accreditation for Student Shared Housing)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Other (please state):

7. Please use this space to write any other comments you have about the proposals:

Thank you for completing this questionnaire. Please return to Regulatory Services, Southampton City Council, Floor 5 One Guildhall Square, Southampton, SO14 7FP. Or to hmo@southampton.gov.uk