

Appendix 3

Housing Services

Additional licensing of Houses in Multiple Occupation (HMOs)

Public consultation report

January 2013

Contents

Section and title	Page
1. Introduction	3
2 Summary of consultation activities, promotions and responses	3
2.1 Overview of activities	3
2.2 Communication	4
2.3 Respondents' to the consultation	4
2.4 Equalities profile from online questionnaire	4
2.5 Overall findings of the consultation exercise	5
2.6 Summary of common themes of what people told us	6
3. The consultation process	12
4. Stakeholders workshop	12
5. Consultation events	14
6. Online Questionnaire	16
6.1 Main points from the response	16
6.2 Comparisons between types of respondents	17
6.3 Responses from inside and outside the proposed additional licensing area	20
6.4 Responses from tenants who live in private rented accommodation	20
6.5 Free text responses	20
7. Written and other responses	23
8. Door step survey	25
8.1 HMO occupants	25
8.2 Residents	26
8.3 Businesses	26
9. Annexes	27
I. Consultation activities	27
II. Communication	34
III. Online questionnaire equality monitoring summary results compared to population figures.	37
IV. Stakeholders workshop report (not included in agenda pack – available online)	
V. Consultation events report (not included in agenda pack – available online)	
VI. Online questionnaire – multiple choice response summary	39
VII. Tables of comparisons for all groups from online questionnaire	47
VIII. Free text answer from the online questionnaire	50
IX. Written and other responses (not included)	
X. Letter promoting the consultation	86
XI. HMO occupants questionnaire	87
XII. Information to businesses	90

1. Introduction

In March 2012 the Cabinet of Bath and North East Somerset Council (B&NES) directed that evidence be gathered to investigate if the legislative conditions for introducing additional licensing of Houses in Multiple Occupation (HMOs) could be met, and undertake 10 week public consultation as required by the [Housing Act 2004](#) (Section 56). Once this process has been completed the Cabinet will make a final decision whether to implement additional licensing and if so, the detail of the licensing scheme.

Although other activities have taken place at various times since March, the formal public consultation took place from the 17th September 2012 until the 30th November 2012. It is currently proposed to take the final report to the Council Cabinet for a decision in March 2013.

2. Summary of consultation activities, promotions and responses

2.1 Overview of activities

The table below shows the consultation activities undertaken and a summary of the approximate numbers of people reached through each activity. For full details of all consultation activities undertaken please see annex I.

Activity	Numbers
Stakeholders workshop	19
On-line questionnaire	272
Written and other responses	62
Drop in events x 3	116
University market stalls x 2	85
Polish Community Event – delegates and service providers	20
Southdown electric blanket testing event	5
Mandatory HMO licence holders mail shot	265
Accredited landlords email shot	400
Letting agents mail shot	46
National Landlords Association (NLA) meeting	68
Accreditation working group	20
West of England Private sector Housing group	4
B&NES Equality Impact Assessment Quality Control Group	8
West of England Landlord Panel	8
Residents (households visited in proposed area)	1120
Businesses visited in proposed area	169
Equality groups and service providers	23
Meetings with student's Union from Bath Spa and University of Bath	4
Local Development Framework (LDF) Steering group	10
B&NES website - Unique page views (17 th Sept – 30 th Nov 2012)	
www.bathnes.gov.uk/hmos (additional licensing info page)	515
www.bathnes.gov.uk/hmo (Article 4 Direction/additional licensing info page)	769
Total	4008*

*Some of the activities undertaken may have covered the same people/groups more than once so the total figure may include some duplicate entries.

2.2 Communication

Annex II gives an indication of direct and indirect publicity and promotion that has gone out in 2012 about additional HMO licensing that has assisted with making the public aware of the consultation. This includes information on the Council website and articles in the Bath Chronicle.

2.3 Respondents' to the consultation

The following numbers of responses were received through the various channels.

Mechanism	Residents of B&NES	Residents of proposed area	Landlords, businesses and organisations	Other	Total
Online questionnaire	35	128	100*	9	272
Written/other responses	2	16	37	7	62
Door step surveys		278			278
Consultation events					289**
Total					901

*Where landlords are also residents their responses have been recorded as landlords and omitted from the residents section. This is because the responses suggest that they have been submitted from a business point of view and are similar to that of other landlords.

**Includes attendees of 3 drop in events, 2 university market stall events, National Landlords Association (NLA) meeting and Polish Community event.

2.4 Equality monitoring from online questionnaire

Optional information regarding the equalities profile of respondents was requested as part of the online questionnaire and compared to B&NES wide statistics. The comparisons can be seen in annex III and roughly show that the responses were broadly in line with the district population as a whole.

The noticeable difference was mainly concerning age. The survey appeared to lack responses from the under 25 year olds and 25-34 year olds. This was despite targeted

action to engage the students of both the City’s Universities. However, significant responses were received from the Student Unions of both Universities who represent and submitted on behalf of a large number of young people from these age groups.

Much higher than expected responses were also received from the 45-54, 55-64 and 65-74 years old groups.

2.5 Overall findings of the consultation exercise

Residents of B&NES	Residents of proposed area	Landlords, businesses and organisations	Other*
Broadly in favour of the proposals although not as strongly as those residents who live in the proposed area	Broadly in support of the proposals for additional licensing	Broadly against the proposals and some very strong objections, however some split on the improvements that may be seen	Broadly more against the proposals than for, although responses were often split

2.6 Summary of outcomes and themes of what people told us

Themes	Residents of B&NES	Residents of proposed area	Landlords, businesses and organisations	Other*
Costs	Split on whether the fees structure looks appropriate (66% of respondents to the online questionnaire thought it did)	<p>Costs are too low</p> <p>No discounts should be given</p> <p>Concerned about rents increasing. Rents are already high in Bath</p> <p>Split on whether the fees structure looks appropriate (60% of respondents to the online questionnaire thought it did compared to 40% who did not)</p>	<p>Fees and costs are too high and rents will increase as a result</p> <p>Need to be transparent</p> <p>There should be lower fees/discounts for good/accredited landlords</p> <p>Generally the fees structure does not look appropriate (80% of respondents to the online questionnaire)</p> <p>Bureaucratic and expensive</p>	General disagreement with the fees structure (75% of respondents to the online questionnaire)
Conditions	Agreed that licensing will improve the condition of HMOs (79% of respondents to the online questionnaire)	<p>Agreed that licensing will improve the condition of HMOs (89% of respondents to the online questionnaire)</p> <p>Main concerns with HMOs are rubbish, recycling, noise, untidy messy gardens and appearance</p>	Mixed views on whether licensing will improve the condition HMOs (from respondents to the online questionnaire, 52% disagree and 36% agree)	Mixed views, although general disagreement that licensing will improve the condition of HMOs (of respondents to the online questionnaire, 25% agreed and 62% strongly disagreed)

Improvements	Broad agreement that the proposed conditions will improve management and safety and quality of HMOs. (78% of respondents to the online questionnaire)	Agreed that licensing conditions will improve the management and safety and quality of HMOs (>90% of respondents to the online questionnaire)	Additional licensing will not solve the issues (as presented in the evidence report). Mixed views although balanced towards disagreement that proposed conditions will improve management of HMOs (60% disagreement, 40% agreement from respondents to the online questionnaire) and safety and quality (51% disagreement to 49% agreement from respondents to the online questionnaire).	Broad disagreement that the proposed licensing conditions will improve management and safety and quality of HMOs (75% to 25% of respondents to the online questionnaire disagreed)
Management	Agreed that licensing will improve the management of HMOs (79% of respondents to the online questionnaire)	Agreed that licensing will improve the management of HMOs (85% of respondents to the online questionnaire) HMO tenants: Generally satisfied with the management of their home (71% of respondents to the door step survey)	Mixed views on whether licensing will improve the management of HMOs (from respondents to the online questionnaire, 53% disagree and 32% agree)	Mixed views although general disagreement that licensing will improve the management of HMOs (of respondents to the online questionnaire, 25% agreed and 62% strongly disagreed)
Area and properties	Proposed area could be increased to include more roads, areas.	Agreed that licensing will improve the local area (79% of respondents to the online	Mixed views on whether licensing will improve the local area (of respondents to the online	Mixed views although generally disagreed that licensing will improve the

	<p>Broad agreement that licensing will improve the local area (75% of respondents to the online questionnaire)</p> <p>Equally mixed views on whether the Council are targeted the right area (respondents to the online questionnaire).</p> <p>Mixed views although general agreement that the Council are targeting the right properties (of respondents to the online questionnaire, 64% agreed, 25% disagreed)</p>	<p>questionnaire)</p> <p>Broad agreement that the Council are targeting the right properties and the right area in the proposals (70% and 86% respectively of respondents to the online questionnaire)</p>	<p>questionnaire, 57% disagreed and 27% agreed)</p> <p>Mixed views although broad disagreement that the Council are targeting the right properties (57% disagreed and 24% agreed of respondents to the online questionnaire).</p> <p>Mixed views on whether the Council is targeting the right area (from the online questionnaire 45% disagree, 34% agree, 20% neutral).</p>	<p>local area (of respondents to the online questionnaire, 25% agreed and 62% strongly disagreed)</p> <p>Broadly disagreed that the Council's proposals are targeting the right HMOs (67% of respondents to the online questionnaire).</p> <p>Some disagreement that the Council are targeting the right area (50% of respondents to the online questionnaire disagreed, one third neutral)</p>
Other		<p>54% of residents spoken to in the proposed area say HMOs cause them problems (Door step survey)</p>	<p>The Council need to use existing powers better</p> <p>There needs to be stronger enforcement on bad landlords</p> <p>Good landlords are being punished for the bad landlords who will get away with it.</p>	<p>Negative impact on vulnerable groups (Online questionnaire)</p>

			<p>The evidence base is questionable and disproportionate to justify such a scheme.</p> <p>The Council need to keep good relationships with landlords</p> <p>Limitations on what landlords can make tenants do</p> <p>Support accreditation instead</p>	
--	--	--	---	--

*Includes those respondents that preferred not to say, were not clear which group they represented or from another group entirely.

General themes from the totality of consultation responses across all groups

- Questions raised over the evidence and validity of the HMO residents survey
- Need to give advice/training to landlords
- Overly bureaucratic
- The Council should target bad landlords
- Costs are too high
- Extend area – including over the whole of Bath. Several specific roads and areas mentioned including Trinity Road in Combe Down, Bear Flat, Twerton.
- Areas not included could be negatively affected
- HMOs are responsible for noise, parking, waste/recycling problems and anti-social behaviour (ASB).
- The Council need to maintain good relationships with landlords
- Experience of poor HMOs from both local residents and students
- Concerns about enforcement. Needs strong enforcement by the Council against bad landlords
- Rental market is already expensive in Bath and rents will increase
- May lead to a reduced availability of HMOs
- The scheme needs to be kept simple

- Additional licensing should improve conditions and management
- The Council should use their existing powers better
- Some conditions are excessive e.g. energy efficiency
- Better for young people, residents and good landlords

3. The consultation process

The formal consultation was launched on the 17th September 2012 and continued until the 30th November 2012. Around 1400 flyers were distributed through various means around the district to promote the consultation and the consultation events.

The main focus of the consultation was the online consultation mechanism on the B&NES Council website which provided an online facility to display all the consultation documents and an online questionnaire. A direct link was available from the B&NES Housing webpages which was widely promoted.

The questionnaire and all supporting documentation were also available to be downloaded and completed by hand. Hard copies were also available at the consultation events and available to be viewed in Moorland Road Library and the One Stop Shop on Manvers Street as well as on request. All consultation documentations are shown as appendix 2 to the panel report.

Consultation events took place in October 2012 and enabled people to turn up at local events, find out information about additional licensing and the consultation and have their say.

A door step survey was also carried out in November 2012 which enabled Housing Services to promote the consultation and gather views and opinions from residents of the proposed additional licensing area.

Throughout the consultation - emails, letters and phone calls were received by a dedicated Housing Services officer.

4. Stakeholders workshop

A stakeholders' workshop was held on the 19th July 2012 where a small group of key partners were brought together to discuss both additional licensing and the Article 4 Direction Supplementary Planning Document (SPD) and to help guide further consultation.

The full report can be seen as Annex IV attached separately.

The main points to come out of the stakeholders' workshop were:

- Some concern that the HMO residents survey in the evidence report represented a small sample, which may undermine its validity. However, most agreed that more evidence would not prove anything different from that already found.
- Useful to have more detail on the reasons for some HMO residents' dissatisfaction to inform and justify additional licensing conditions.
- Surprise about fuel poverty and bad conditions.

- The introduction of additional licensing was broadly supported.
- General consensus that the Wards selected look appropriate. Suggested that there could well be a case for rolling this out to other Wards in due course e.g. Kingsmead, Abbey, Newbridge and Twerton. One group raised the concern that bad landlords might move outside the Wards where there is additional licensing into less regulated wards.
- A comment was made that the scheme should be rolled out to all three Wards at once – as otherwise it could be confusing.
- Suggestions were made that in consultation and implementation it would be useful to either include whole streets where Ward boundaries divide them, or, particularly in the case of long streets, to include numbers xx – xx to define which parts of the street are affected.
- No concerns were raised with regard to the exclusion of Section 257 HMOs.
- There was support for the fact that proposed conditions pick up conversion of garages into additional bedsits.
- Suggestion that conditions should include requirements for hard-standing for waste receptacles or requirement for storage inside or in back garden. However, there was also a desire to encourage green front gardens to be retained.
- There was a question about what the energy efficiency standards would be and how far these would go.
- There was a comment made that there needs to be awareness that there are limitations on what you can make tenants do (in terms of the tenant agreement).
- It will be important that if you can make landlords provide tools for gardens, they must be in good working order.
- Important to link to other corporate teams and projects.
- There was an acceptance that landlords would recoup the costs incurred through rent and it may not be passed on fairly. Some suggested that this may be less of an issue if licencing payments were made annually and landlords could spread the cost.
- The new standards should be the focus of the licencing consultation – the details of these will be important.
- There was a general comment that more help, advice and updates to landlords and agents on legislation and standards to keep them informed, will be required.

5. Consultation events

In October 2012 various events were held in order to promote the additional licensing consultation and seek feedback. The events were held jointly with Planning Policy who were consulting on the Supplementary Planning Policy (SPD) for the Article 4 Direction.

A full report of the events can be seen as annex V.

In summary, nearly 300 people attended the events. The main views and themes to come out of these events are summarised as follows:

Event	Main themes about additional licensing proposals
Presentation to members of the National Landlords Association (NLA) of Wessex, 17th October	<ul style="list-style-type: none"> • Perceived by many as a tax on good landlords. • Bureaucratic/expensive process with nothing in return. • Not convinced on some of the criteria e.g. energy efficiency. • A way of the Council funding services that used to be free to landlords – questions about enforcement. • Need better enforcement on bad landlords. • Should consider financial incentives for good landlords – maintained goodwill of landlords. • Accounts need to be transparent.
Market Stall at Bath Spa University Students' Union, 18th October, 11am – 2pm	<ul style="list-style-type: none"> • Recognition of the negative quality of housing that many had experienced. • Worry about costs being passed on to tenants as rental market is already expensive in Bath. • Generally not supportive of aesthetic improvements. • Raise standards and give students piece of mind. • Some questions were asked about particular conditions e.g. outside recycling receptacles. • There were concerns raised about enforcement and that bad landlords would stay “under the radar”.
Market Stall at University of Bath Students' Union, 23rd October, 11am – 2pm	<ul style="list-style-type: none"> • There was recognition of the negative quality of housing that many had experienced. • Worry about costs being passed on to tenants as rental market is already expensive in Bath. • Some misunderstanding about how onerous and costly it would be to comply with the proposed licensing conditions (both on the part of landlords and tenants).
Open Event at One Stop Shop, Manvers Street, 23rd October, 6-9pm (with briefing	<ul style="list-style-type: none"> • Variety of views, ranging from full support to various concerns about implementation, and a

presentations)	<p>feeling that good landlords are already doing this, to complete objection.</p> <ul style="list-style-type: none"> • There was discussion about whether this could create illegal sub-letting of rooms. • There was some discussion about whether this would reduce the HMO market, with landlords choosing to let to families instead. • Requests made to minimise bureaucracy and paper work as much as possible. • There was a concern that additional licensing could ruin good relationships the Council already has with landlords, and questions were raised over why it is being proposed. • There was a comment that it should extended to cover the whole of B&NES.
Open Event at St Alphege's Parish Hall, Oldfield Lane, 24th October, 5.30 - 8pm	<ul style="list-style-type: none"> • There was general consensus in support of the licensing proposals, with some asking why it had not been brought in earlier. • One comment that landlords need to be responsible for their properties, especially the outside.
Open Event at Oldfield Baptist Church Hall, Moorland Road, 25th October, 3 - 7.30pm	<ul style="list-style-type: none"> • Most people were supportive. Local residents were particularly supportive of the waste and gardening conditions. • Landlords expressed concerns about the costs being too high. • Some local residents felt costs were too low. • Some comments were received that there should be conditions relating to noise and sound insulation. • Must be strong enforcement on the bad landlords. • Some comments were received that licensing may not improve HMO quality. • Comments were received that the area should be extended.
Polish Community Information Event, St John's Catholic Primary School, 27 th October, 1-4pm	<ul style="list-style-type: none"> • There was concern raised that rents in and around Bath are already very high.

Attendees of some of the events were also asked whether they agreed or disagreed with what additional licensing could achieve via a sticker tally board. Full details are contained within the consultation events report in annex V.

In summary, the event at the University of Bath Student's Union showed generally mixed views. There was some disagreement that the Council is targeting the right areas and right properties but some agreement that additional licensing will improve the condition and management of HMOs. Other areas were split. At the events at St.

Alphege’s Parish Hall and Oldfield Baptist Church, there was broad agreement that the Council’s proposals will see improvements.

6. Online questionnaire

An online questionnaire was made available for completion from the 17th September until the 30th November 2012. Hard copies of the online form were received by Housing Services up until the 7th December 2012 to allow for responses that were delivered by hand to Council offices to go through internal post.

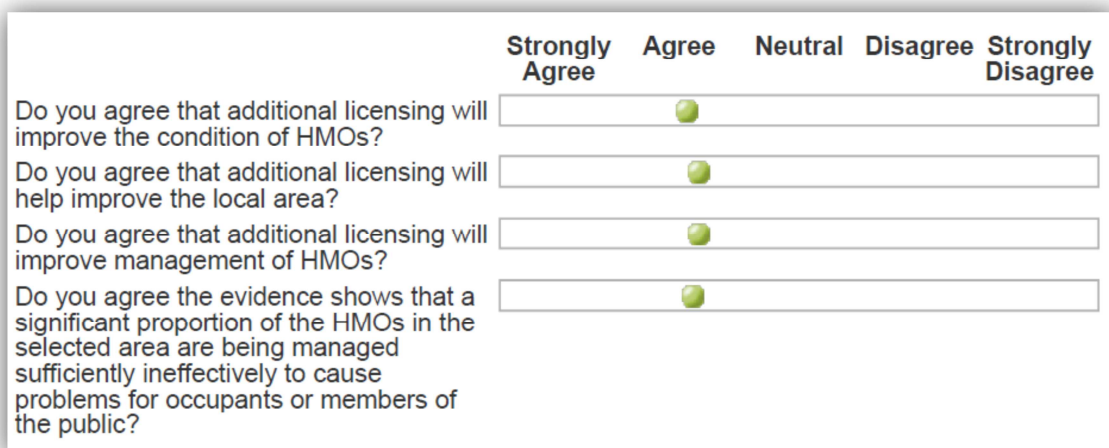
272 responses were received to the online questionnaire. However, not all questions were completed by all respondents so the number of completed responses to each question was generally lower.

The questionnaire is contained within the consultation documentation shown in appendix 2 to the panel report.

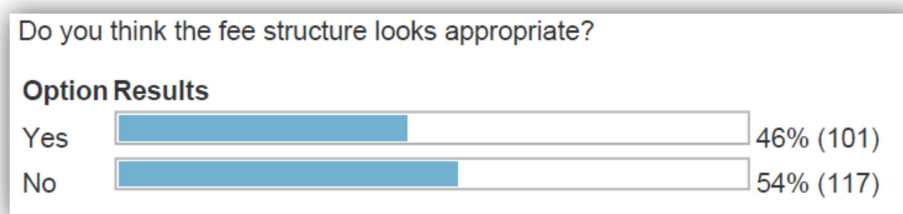
A summary of all the responses to the multiple choice style questions is shown below as annex VI.

6.1 Main points from the response

- The majority of responses were received from residents although a sizeable number of landlords also responded. In some cases, residents who responded were also landlords for example, and therefore the initial figures appear higher than 100% as they may have ticked more than one box.
- The majority of respondents were homeowners whereas only 11% rent privately.
- On average the following statements were agreed with.



- The average response was neutral in respect of ‘*Do you agree that the scheme should cover HMOs with shared facilities and not include buildings converted into self-contained flats and purpose built student accommodation?*’
- There was general agreement that the proposals are targeting the right area.
- 73% agreed that the proposed licensing conditions will help improve how HMOs are managed. 27% disagreed.
- 76% agreed that the proposed licensing conditions will help improve the safety and quality of HMOs. 24% disagreed.
- 60% agreed it was a good idea to improve the energy efficiency of HMOs within the scheme. 23% were unsure, 17% did not agree.
- The responses received regarding the fees structure were very even as shown below:



This question did not allow for elaboration on the response however an open question was given allowing for such elaboration and this is summarised later.

- Regarding vulnerable people, 51% thought additional licensing would positively impact on vulnerable people compared to 30% who did not know and 18% who believed the impact would be negative.
- A large number of respondents wished to be kept informed.

6.2 Comparisons between types of respondents

The responses were divided in to 4 different groups to get a stronger feel about what different people wanted:

1. Residents of proposed additional licensing area
2. Residents of B&NES
3. Businesses and organisations – including landlords, letting agents, universities
4. Other/prefer not to say

Full tables of comparisons for all groups are shown in annex VII.

Where landlords are also residents their responses have been recorded as landlords and omitted from the residents section. This is because the responses suggest that they have been submitted from a business point of view and are similar to that of other landlords.

Residents of the proposed additional licensing area were not included in the responses from B&NES residents as they were considered on their own merit.

Numbers and percentages of responses for each question represent where an answer was given. Where no answer was given to the questions these responses were omitted.

In summary, residents of the proposed additional licensing area and residents of B&NES were generally more in agreement with the aspects of the consultation than businesses and organisations.

The most noticeable comparisons between the groups are summarised below:

- 89% of residents of the proposed area and 79% of B&NES residents agreed or strongly agreed that additional licensing will improve the condition of HMOs. Only 36% of businesses agreed or strongly agreed that licensing would improve the condition of HMOs as did 25% of 'other/prefer not to say'. 52% of businesses and organisation and 62% of 'other/prefer not to say' disagreed or strongly disagreed.
- 89% of residents of the proposed area and 75% of B&NES residents agreed or strongly agreed that additional licensing will help improve the local area compared to 27% of businesses and organisations. 57% of businesses and organisations disagreed or strongly disagreed and 62% of 'other/prefer not to say' strongly disagreed.
- 85% of residents of the proposed area and over 79% of B&NES residents agreed or strongly agreed that additional licensing will improve management of HMOs. 53% of businesses and organisations disagreed or strongly disagreed compared to 32% who agreed or strongly agreed. 63% of 'other/prefer not to say' strongly disagreed whereas 25% agreed.
- 87% of residents of the proposed area and 65% of B&NES residents agreed or strongly agreed that the evidence shows that a significant proportion of the HMOs in the selected area are being managed sufficiently ineffectively to cause problems for occupants or members of the public. 30% of businesses and organisations and 25% of 'other/prefer not to say' also agreed or strongly agreed compared to over 47% and 63% respectively who disagreed or strongly disagreed.
- 70% of residents of the proposed, 64% of B&NES residents and 24% of businesses and organisations agreed or strongly agreed that the scheme should cover HMOs with shared facilities and not include buildings converted into self-

contained flats and purpose built student accommodation. 67% of 'other/prefer not to say', 57% of businesses and organisations and 25% of B&NES residents disagreed or strongly disagreed.

- 86% of residents of the proposed area, 45% of B&NES residents and 34% of businesses and organisations agreed or strongly agreed that the Council is targeting the right area for this scheme. 50% of 'other/prefer not to say', 46% of B&NES residents and 45% of businesses and organisations disagreed or strongly disagreed.
- Over 92% of residents of the proposed area and 78% of B&NES residents agreed that the proposed licensing conditions will help improve how HMOs are managed. Businesses and organisations were 60% to 40% against, 'other/prefer not to say' were 75% to 25% against.
- Over 94% of residents of the proposed area and 78% of B&NES residents agreed that the proposed licensing conditions will help improve safety and quality of HMOs. Businesses and organisations were roughly 50:50. 'Other/prefer not to say' were 75% to 25% against.
- 78% of B&NES residents, 69% of residents of the proposed area, 40% of businesses and landlords and 25% of 'other/prefer not to say' agreed it was a good idea to improve the energy efficiency of HMOs in the scheme. This compared to 75% of 'other/prefer not to say' and 38% of businesses and organisations who disagreed. 26% of residents of the proposed area and 21% of businesses and organisations were unsure.
- Over 80% of businesses and organisations did not think the fee structure looked appropriate supported by 75% of 'other/prefer not to say'. Around 60% to 40% of residents of the proposed area thought the fee structure looked appropriate supported by two thirds of B&NES residents.
- All responses from the 'other/prefer not to say' group thought additional licensing would have a negative impact on vulnerable groups in the community. Businesses and organisations were evenly split and residents broadly thought the impact would be positive.

6.3 Responses from inside and outside the proposed additional licensing area

Responses were then classified according to whether they were received from people or organisations operating within or outside the proposed area.

In general there was a clear divide between responses received from people directly affected (living or operating within the proposed area) compared to those coming from outside the proposed area. The responses from those inside the proposed area were more in agreement that improvements would be seen if additional licensing came in than those that were not. It should be noted that those outside the proposed area were only small in number.

6.4 Responses from tenants who live in private rented accommodation

Respondents who said they rent privately from a landlord or agent were also looked at separately. The number of private renters who responded was very low and there was a broadly even split between agreement and disagreement for most questions. The responses that stood out were:

60% agreed that it is a good idea to improve the energy efficiency of HMOs within the scheme. 20% no; 20% unsure. 73% thought the fee structure did not look appropriate and 57% felt the proposals would have a negative impact on vulnerable groups. 21% positive; 21% didn't know.

6.5 Free text responses

Below is a summary of responses given where free text answers were available. The full free text responses are shown in annex VIII.

What other help and support do you think we should be offering landlords whose properties will need a licence?
<ul style="list-style-type: none">• The most common responses received suggested that we should not provide any further help to landlords. However, it was frequently suggested that the Council should provide further information, guidance, training and education to landlords. It was also raised that residents should be better kept informed about HMOs in their area.• It was also suggested that the Council should offer financial support to landlords, ensure strong enforcement of the legislation and provide more support if problems occur related to HMOs.• Resourcing the voluntary accreditation scheme was also raised as was lowering the fees. Other comments were concerned with the Council offering discretion where appropriate and encouraging communication between landlords and the

community.

Would you like to see any changes to these proposed conditions or do you have any suggestions?

Suggestions received included the following:

- The strongest area to come out of these responses was that there needs to be strong enforcement by the Council, not just of the conditions but also better use of existing powers and targeting of bad landlords and tenants.
- There was also general disagreement with the proposals and a feeling in some cases that the conditions were excessive. There was also some general agreement.
- It was mentioned that costs are too high and properties may be sold as a result and rents may increase. It was mentioned that the standards should be the same as the accreditation standards and one person mentioned that accredited properties should be exempt from licensing.
- Concern was raised about the minimum room sizes, restricting garage conversions and how landlords can be expected to manage tenants.
- There was concerns about the condition on energy efficiency and that it was too onerous. It was also suggested that conditions around parking, noise, external areas, waste and recycling and security should be included as well as an element of neighbour consultation and reasonable discretion shown in applying the conditions.

Do you have any suggestions about the fees structure, for example, some people think we should offer discounts where landlords behave in a professional manner and save the Council time and resources.

- A number of responses were in direct comparison. It was suggested that the proposed fees are too high and similarly the proposed fees too low; discounts should be given and similarly discounts should not be given.
- It was also suggested that there should be lower fees for good landlords including those that are already accredited and higher or only fees for bad landlords.
- It was mentioned that rents will increase as a result, there should be a reduced fee for renewals, the income should be used to pay for sorting out problems with the properties and locals concerns. The fees need to be transparent and there should be the opportunity to pay yearly or in instalments.
- There was one response saying that the proportional increase in fees is not fair and one saying it was fair. There was also a request to keep simple.

Please give us more detail on who you think will be positively or negatively impacted by additional licensing and why?	
Common responses suggested that the following positive and negative effects would be felt by additional licensing:	
Positive affects	Negative affects
Safer for tenants Young people (including students) Residents Good landlords Mixed communities Elderly people	Rents will go up Young people (including students) Areas not covered by additional licensing Good landlords Bad landlords Low income Tenants Evictions Reduced availability Home owners Disabled

Would you like to make further comments on additional licensing?
<p>In summary, common suggestions and comments included:</p> <ul style="list-style-type: none"> • Additional licensing overlaps with accreditation. • There needs to be strong enforcement. • Rents will increase. • Costs are excessive. • Some responses were generally against additional licensing and some were generally for additional licensing. • HMOs cause problems associated with recycling and rubbish, parking, noise and poor appearance. • Additional licensing will result in less housing. • Proposed area should be larger or city wide. • HMOs need to be safe. • Landlords cannot control tenants. • Energy efficiency condition is excessive. • The council should use existing powers better. • Keep it simple. • Transparency. • Fines should be imposed on landlords if problems occur with properties and tenants. • Landlord forums would improve the Councils working relationships with landlords.

Other points raised during the consultation process, not directly related to licensing included:

- Parking, residents parking permits and lack of parking.
- Rubbish collections and provision of recycling containers from the Council.
- Balanced communities – less HMOs in certain areas and more family homes.
- 24 hours out of hours service for the council including assistance with anti-social behaviour, noise nuisance etc.
- Landlords should be considered as a business and pay business rates.
- Students should pay Council tax.

Several comments were received that not enough space was given for free text responses. As a result, this increased the number of other written responses received.

7. Written and other responses

62 written and other responses including notes taken from verbal responses were received in relation to the consultation. These are attached separately as annex IX.

In summary, the responses were received from 29 landlords and letting agents, 18 residents, 9 groups and organisations (including landlord groups and a residents group) and 6 other.

27 responses were generally in favour and 24 were generally against with the remainder being non-committal.

Residents

Of the residents who responded including 1 residents group (19), 17 were generally for and 2 were non-committal. Two landlords responded who were also residents and their responses were grouped with the landlords.

The residents group that responded was the Westmoreland Residents Association who were in favour of the proposals and raised concerns regarding untidy gardens, being able to contact landlords and the Council not having a 24 hour service.

Residents mainly had concerns associated with rubbish and recycling, noise and untidy and messy gardens.

Landlords and Letting Agents

Of the landlords and letting agents who responded including 3 landlord groups (32), 22 were generally against and 6 were generally for the proposals. The remainder did not make it clear either way.

The landlords groups that responded were The National Landlords Association (NLA), The National Landlords Association Wessex (NLA Wessex) and The Residential Landlords Association (RLA). They submitted significant responses and were all against the proposals raising concerns regarding the evidence base, the impact of the licensing proposals and increasing rents.

Landlords mainly had concerns associated with good landlords being punished for the bad ones who they believe will continue to get away with not complying. They raised concerns with increased bureaucracy and felt the Council should use existing powers better and there should be stronger enforcement. They also felt fees are too high, rents will increase, evidence is questionable, licensing will not solve the issues and voluntary accreditation should be used instead.

Other organisations who responded

- Avon and Somerset Police who were keen to see security measures included in any scheme.
- Avon Fire and Rescue Service who were in favour of any measure that would protect occupiers and provide training to tenants.
- Bath Spa University and Bath Spa Students Union (joint response) welcomed improving standards but had concerns about licensing and potential for rental increases.
- The University of Bath Students Union were generally against any licensing and questioned the evidence and the conditions being proposed.
- The University of Bath were in favour of additional licensing.

The main themes identified from the responses included

- HMOs are responsible for problems associated with rubbish, recycling and waste, untidy and messy gardens; parking problems, noise problems; anti-social behaviour; poor appearance.
- Stronger and better enforcement is needed by the Council and the Council should use their existing powers better.
- Proposed fees are too high and rents will increase as a result of licensing.
- More bureaucracy which will not solve the issues.
- Evidence base is questionable to justify this kind of intervention.
- Use and resource accreditation instead.
- Bad landlords will get away with not complying and good landlords are being punished for the bad ones.
- Area being covered should cover the whole of Bath.

8. Door-step surveys

In November 2012 officers from Housing Services visited 1120 residential premises in the areas affected by the additional licensing proposals. The areas visited are detailed below.

Ward	Road
Oldfield	Herbert Road
Oldfield	St Kilda's Road
Widcombe	Brougham Hayes
Widcombe	Lorne Road
Westmoreland	Triangle North
Widcombe	Pulteney Gardens
Westmoreland	Coronation Ave
Widcombe/Lyncombe	Wells Road
Widcombe	Carlton Gardens
Widcombe	Carlton Road
Westmoreland/Twerton	Shophouse Road
Twerton	High Street
Widcombe	Calton Walk
Oldfield	Beckhampton Road
Westmoreland/Southdown	Lymore Avenue
Bathwick	Lime Grove Gardens
Oldfield	Third Ave
Oldfield	Monksdale Road

Through this work each household was door knocked and left with a letter detailing the consultation (see the attached letter in annex X).

Where an occupant was at home and willing to talk to the surveyor, the additional licensing consultation was discussed and promoted and pre-defined questions were asked of the occupant.

8.1 Residents of HMOs

HMO residents were asked the questions as shown in annex XI. 129 tenants were spoken to and the following responses were given:

- 129 tenants of HMOs spoken to. 27% from Oldfield; 38% from Westmoreland; 33% from Widcombe; 2% other
- 95% have working smoke alarms in their homes, over half were only battery powered.
- Over half were not advised to check their smoke alarms every week, one quarter were and the remainder did not know.

- Over half were not shown how to check their smoke alarms, over one quarter were.
- Over 80% were informed about refuse and recycling collections days.
- Over two thirds have been given enough recycling and rubbish containers.
- 40% were given a copy of the EPC when they moved in. 35% were not and 24% did not know.
- 57% were given a copy of the gas safety certificate when they moved in. 21% were not and 23% did not know.
- 95% knew who to contact if their home needs a repair.
- 73% have 24 hour contact details for their landlord or agent. 22% did not.
- 89% either very or fairly satisfied with their home.
- 71% very or fairly satisfied with the management of their home. 20% either fairly or very dissatisfied

8.2 Non-HMO residents

Residents who did not live in HMOs were simply asked:

1. Are you aware of any shared houses in your local area?

Yes/No/Don't know and Comments

2. Do they cause you any problems?

Yes/No/Don't know and Details

149 residents were spoken to and the following responses were given:

- 149 residents spoken to. 31% from Westmoreland; 26% from Oldfield; 26% from Widcombe; 17% from a combination of Bathwick, Widcombe/Lyncombe, Westmoreland/Southdown, Westmoreland/Twerton. These spilt Wards are instances where roads pass through Ward boundaries.
- 139 (93%) were aware of shared houses in their local area.
- 81 (58% of residents who were aware of shared houses in their local area; 54% of total people spoken to) reported that shared houses cause them problems.
- Some people chose to elaborate into the problems. The top 3 concerns recorded were rubbish, noise and appearance.
- Some people also mentioned the positive result of increased numbers of shared houses being more young people in the area and improved bus routes.

8.3 Businesses

During November, 169 businesses were visited in the proposed additional licensing area and left with a letter and information on the proposals including how to respond to the consultation. Information enclosed as annex XII.

9. Annexes

Annex I

Consultation activities (7 pages)

Who	When	Contacted	Meeting	Details
Westmoreland Cllr. June Player	27/3/12		✓	Discussed HMOs, community issues and walked around her ward
Angela Hardacre, NLA Wessex representative and Jacqui Darbyshire, NLA South West representative.	4/4/12		✓	Discussion around the possibility of discretionary licensing in B&NES and what the Council are investigating.
Waste Services	5/4/12		✓	Meetings with Lorinda and Tim from Waste Services
Richard Jones, RLA representative.	18/4/12		✓ (tel)	Discussion to raise awareness that B&NES are looking into the possibility of discretionary licensing.
Accreditation Working Group	18/4/12		✓	Additional licensing update
Accommodation Office, University of Bath	23/4/12		✓	Amongst other items, discussed potential for additional licensing and what the Council are investigating.
Cllr June Player	25/4/12		✓	Discussed HMOs and local issues
Local Landlord	30/4/12		✓	Meeting to discuss concerns and the possibilities of additional licensing
Peter Hall from Trustease Residential Lettings and RoseMarie Simcox from Roman City Property Management	3/5/12		✓	Meeting to discuss the possible options for additional licensing and gather ad what the council are considering.
Widcombe Cllr. Ben Stevens	3/5/12		✓	Discussion about additional licensing
Bath Spa Student Union, Harry Birch and University of Bath, Student Union, Naomi Mackrill	4/5/12		✓	Meeting to keep the student Unions updated and share thoughts and opinions.
Oldfield Cllr. Will Sandry	10/5/12		✓	Walk around Oldfield Ward discussing concerns
Research and Intelligence	14/5/12		✓	Discussed available evidence around HMOs
Oxford City Council, Ian Wright	6/6/12		✓	Discussion on their experiences of additional licensing.
David Kybett (NLA Oxford Rep)	6/6/12		✓	Discussed his experiences of additional licensing in Oxford.
WoE landlord panel meeting	20/6/12		✓	Raised and discussed B&NES considerations for additional licensing.
West of England Landlord Panel	20/6/12 4/10/12		✓	Regional meeting with local landlord representatives and organisations and the 4 West of England Authorities (South

				Gloucestershire, Bristol, North Somerset)
Lee Cecil (NLA Wales Rep)	22/6/12		✓ (tel)	Advises Welsh government. Cardiff, Newport and Swansea all have discretionary licensing. Most Welsh authorities don't enforce HA04 consistently and fairly against bad landlords. Would like to see rewards for good landlords.
Westmoreland Cllr. June Player	23/6/12		✓	Walk around Westmoreland discussion June's concerns, talking to residents and how discretionary licensing may be able to help and its limitations.
Student Union reps Emma Haskins, Hanna Wade, Chris Clemens.	27/6/12		✓	Concerned about costs passed on to tenants, licence cost plus works costs. Students find affordability difficult anyway. Some benefits. Communal space maybe a problem – students may prefer lower rent and no living room. Keen to promote standard of living and housing standards.
Students Union reps	27/6/12		✓	Further discussions to keep them informed.
Cardiff City Council, Steve Tudball and Bethan Jones	4/7/12		✓	Discuss on their experiences of additional licensing.
West country landlord association	9/7/12	✓		Info sent on stages so far
Stakeholders meeting	19/7/12		✓	Stakeholders meeting – see report from this event.
Avon fire and Rescue Service	8/8/12		✓	Meeting with Rus Bennett, Steve Halsted, and Mark Burton to explain proposals and discuss their thoughts.
James Hinchcliffe, Communications and Marketing	9/8/12		✓	Meeting to discuss communications opportunities and promotion of consultation. #Details of actions undertaking are below.
Local Development Framework steering group	4/9/12		✓	Meeting with the LDF steering group to explain and discuss the proposals for additional licensing.
Unite (student accommodation providers)	11/9/12		✓	Meeting with Jagdeep Bhogal at Charlton Court and Waterside to discuss Unite's business and proposals for additional licensing.
Widcombe Residents Association	14/9/12	✓		Email and publicity article sent
All Cllrs.	18/9/12	✓		Email re. Additional licensing consultation
Accredited landlords	19/9/12		✓	Email shot (~400)
Community Liaison Officer	19/9/12		✓	Meeting with Jenny Dean
B&NES Equalities team	25/9/12		✓	Meeting with Cordelia Johnny to discuss proposals and implications.

FOBRA (federation of Bath residents association)	26/9/12	✓		Robin Kerr (secretary) - telephone conversation + email follow up.
Electric blanket testing event at Southdown Methodist church	26/9/12		✓	Attended event and took information to promote and discuss additional licensing consultation.
Equality groups contacted by email	27/9/12	✓		<ul style="list-style-type: none"> • BEMSCA • Manvers Street Mosque • Age concern UK • BFESG • B&NES people first • LGBT workers challenge group
Westmoreland, Oldfield and Widcombe Ward Cllrs.	01/10/12	✓		All ward Cllrs – Widcombe, Westmoreland and OP emailed flyers and asked if they want copies JP – sent flyers
Homeseach Partnership	2/10/12	✓		Email and postcard sent to all social landlords dealt with in B&NES
Accreditation letters and forms	2/10/12	✓		Postcard sent out with various accreditation documents from 2/10/12 onwards (~100 leaflets)
Waste services promotion/door knocking	4/10/12	✓		Student door knocking w/c 8 th Oct onwards – 200 leaflets provided
Bath racial equality council	4/10/12	✓		Email and flyer sent to Raj Lalla and Bath REC to raise awareness of additional licensing consultation.
BEACH (Bath East Asian, Chinese & Friends Group)	4/10/12	✓		Email and flyer sent to raise awareness of additional licensing consultation.
Bangladesh Association	4/10/12	✓		Letter and flyer sent to the Bangladesh Association Bath to raise awareness of the additional licensing consultation.
West of England landlord panel	4/10/12		✓	Information and flyers provided on additional licensing incl. short guide to AI. Representatives included NLA, ARLA, BCC, North Somerset.
Mandatory licensed holders	5/10/12	✓		Mail shot + flyer to 265 existing HMO licence holders
Letting agents	5/10/12	✓		Mail shot + flyer 46 B&NES letting agents
Accreditation working group	10/10/12		✓	<p>Flyers given out and information provided on additional licensing.</p> <p>Attendees included:</p> <p>Del Davies - Bath Uni Accommodation manager, Hanna Wade - Bath Uni SU, Peter Hall/Jayne - Trustease, Beth Shire – police Tim Rawlings – Waste Janet Redfern – NLA Wessex Jenny Dean – Community Liaison officer Officers from Housing Services</p>
Flyer delivery, promotion	11/10/12	✓		~288 flyers distributed to commercial premises around the proposed additional licensing area

				and bordering areas. *See attached list of venues visited and leaflets left.
Swan advice network	11/10/12		✓	Meeting with Fiona in the One Stop Shop to inform her about the additional licensing consultation. Provided flyers and information. Follow up email and information sent.
Learning Partnership Support West	11/10/12		✓	Met with Faye Joines in One stop Shop. Provided flyers, Follow up email and info sent.
Oldfield Park Baptist Church	12/10/12	✓		10 flyers + letter and poster sent by post. e-postcard sent
St Alphege's Parish Church	12/10/12	✓		10 flyers + letter and poster sent by post. e-postcard sent
Age UK	12/10/12		✓	Meeting with Gillian in the One Stop Shop about additional licensing and implications and consultation. Postcard flyers given and information on additional licensing including short guide and key facts given.
One Stop Shop	12/10/12	✓		A3 display put in One Stop Shop
Moorland Road Library	16/10/12	✓		All additional licensing documents provided in a folder for public viewing. Flyers put up.
One Stop Shop	16/10/12	✓		All additional licensing documents provided in a folder for public viewing.
NLA meeting	17/10/12		✓	Attendance 68 Presentation given and display stands. Information provided: ~50 leaflets given out ~20 short guide's to additional licensing consultation ~20 Poster hand-outs on additional licensing 8 questionnaires (hard copies) provided ~10 consultation events timetable provided
Bath Spa University, Students Union Market Stall consultation event	18/10/12		✓	Display stand and promotion and discussion about the consultation and proposals.
Equalities dip-in sample group	22/10/12		✓	Discussed proposals and potential for impacts on different groups.
University of Bath, Students Union Market stall consultation event	23/10/12		✓	Display stand and promotion and discussion about the consultation and proposals.
One Stop Shop Consultation drop-in event and presentations	23/10/12		✓	Evening consultation drop in event with display stands and 2 briefing presentations.
St Alphege's Parish Hall consultation drop-in event	24/10/12		✓	Evening consultation drop in event with display stands.
Oldfield Park Baptist Church consultation drop-in event	25/10/12		✓	Afternoon and evening consultation drop in event with display stands.
Polish Community event, Oldfield	27/10/12		✓	Presentation given and display stand presented. Polish Community event attended.

				~20 attendees including partners.
Door step surveys	Nov '12	✓		Visited 1120 properties with information
Bath Islamic Society	6/11/12	✓		Email sent to the Imam with attached flyer and information offering to meet.
Royal United Hospital (RUH) communications	6/11/12	✓		Voicemail and email sent to press office with attached flyer and press release requesting to display info and send to staff.
St John's Catholic Church, Bath	6/11/12	✓		Email sent with attached flyer and information requesting to display and disseminate information to parishioners.
Moorland Road Traders Association	6/11/12	✓		Email sent to Moorland Road Traders Association providing information and offering further discussion on additional licensing.
Widcombe, Westmoreland, Oldfield Cllrs	7/11/12	✓		Email further promoting the consultation and reminder of the end date.
Universities	7/11/12	✓		Email to Bath Student Union and Bath Spa Student Union promoting the consultation and reminder of the end date.
CAB	7/11/12		✓	Meeting with Kathy Venning, Supervisor for the CAB. Discussed additional licensing and gave flyers and information.
Housing Options and Homelessness team	7/11/12		✓	Meeting with Lynden Swift – Team Leader of HOHT. Discussed additional licensing with him, potential effect on homelessness and rents and details of the proposed scheme.
All Councillors	9/11/12	✓		Email to all Cllrs. further promoting the consultation and reminder of the end date.
Business outlets	26/11/12	✓		169 premises visited in proposed area and bordering areas and information on additional licensing provided. **List of premises and areas covered below.
West of England Private Sector Housing Group	Monthly meetings		✓	Discussed B&NES proposals for additional licensing.
Environmental protection			✓	Meetings with Aled Williams
Planning Policy			✓	Regular meetings

***Flyer delivery, promotion 11/10/12 Number of leaflets left is an approximation**

<p>Ralph Allen - North Road</p> <ul style="list-style-type: none"> • Camomile Clothes x 5 and 1 in window • Bath Bakery North Road x 10 • Pet Shop x 1 in window - £2 • North Road Pharmacy x 10 <p>Bear Flat</p> <ul style="list-style-type: none"> • Bear Flat Pharmacy x 6 • Andrews Estate Agents x 8 • Co-op x 8 • The Bear Pub Notice Board x 2 • Bear Flat Tesco Express x 2 • Fidelis Letting x 5 	<p>Widcombe Parade</p> <ul style="list-style-type: none"> • Roundabout Baby Clothes x 8 • Widcombe Rental Solutions x 6 • Widcombe Health Foods Shop x 5 • Widcombe Pharmacy x 5 • Widcombe Surgery and Pharmacy x 8 • Kindling Coffee Shop x 8 • McColl's Widcombe x 1 in window £3 • Locksmith x 8 • Lennie's Coffee Shop x 8 • Laundrette x 8 • Roman City x 8 • Bath Property Shop x 10 • Widcombe Baptist Church x 5 	<p>Lower Bristol Road</p> <ul style="list-style-type: none"> • The Lunch Company x 5 • Café 84 x 5 • Sainsbury's Notice Board x 1 • Green Park Notice board x 1 • Lime Lounge x 5 • Out to Lunch x 5 • Trustease x 8 <p>Twerton</p> <ul style="list-style-type: none"> • Boots Pharmacy x 8 • Time Bank Volunteer Shop x 2 • Co op x 2 • Bakery x 4 • Pub in central high street Twerton x 5
<p>Moorland Road</p> <ul style="list-style-type: none"> • Baptist Church x 4 • Post Office x 5 • Velo Lounge x 5 • Herbie's Fish and Chips x 5 • Bath Bakery Café x 4 • Sainsbury's Local x 2 • Freshlets Agents x 8 • New Leaf Health Foods x 5 	<p>Chelsea Road</p> <ul style="list-style-type: none"> • Post Office x 2 - Cost £5 – have receipt • Andrews Estate Agents x 10 • Other Estate Agent x 10 • Bath Bakery x 10 • Laundrette x 10 • Chelsea Café x 10 	<p>Kingsway</p> <ul style="list-style-type: none"> • Tesco Express x 1 on notice board

****Business premises visited 26th November 2012.**

169 information leaflets were delivered by hand. Premises and areas included:

<ul style="list-style-type: none"> • Moorland Road – all premises • Shaftsbury Road – all premises • Coronation Avenue – all premises • Claverton Street – all premises • Lower Bristol Road – all retail outlets and small medium business from Twerton to Widcombe (within proposed area) • North Road – McColls, Co-Operative, Dudley Taylor Pharmacy, Coombe Down Hardware, Bath Bakery, Seafood, Chip shop, Forester and Flower • Widcombe Hill – Widcombe Social Club, Mitchell Taylor Workshop, Naturel Theatre, White Hart Pub, • Wells Road – all premises • Wellsway • Pulteney Road – Royal Oak, Homemaker, Widcombe Church of England Primary School, Widcombe Baptist Church • Rosemary Place industrial units (off Lower Bristol Road) • The Victoria, Millmead Road • Artistic Plastercraft, Lyndhurst Road • Marko photography, Dorset Close • Charmbury Arms, Brook Road • Genesis Furniture project, Oldfield Park • Bronzeduke, Bellotts Road • Partisan, Burnham Road 	<ul style="list-style-type: none"> • Kip McGrath, education centre, Bath, Jews Lane • St Mark’s Community Centre, St Mark’s Place • Bath MOT Centre • Christian Science Church, Claverton Street • Digital Print, Lorne Road • Methodist Free Church, High Street, Twerton • Moorfields Inn, Wellsway <p>Ethnic food outlets</p> <ul style="list-style-type: none"> • Ruposhi – Widcombe • Mint Room – Claverton Street • Happy Garden – Coronation Ave • Royal Dragon – Coronation Ave • Adel’s takeaway – Shaftsbury Road • Panahar – Moorland Road • Polski shop – Moorland Road • Cheong Sing • Peking Chef • Mouchuck - Wells Road
---	--

Annex II

Communication

Direct and indirect articles and publications regarding HMOs and additional licensing in B&NES (3 pages)

Date	Title/information	Detail/Location
14/6/12	Bath residents' anger over number of student homes	Bath Chronicle article: http://www.thisisbath.co.uk/Bath-residents-anger-number-student-homes/story-16367918-detail/story.html
31/7/12	Considerations for additional licensing in Bath and North East Somerset	West of England website: http://www.privatehousinginformation.co.uk/site/297.asp
9/8/12	Huge support for planning curbs on HMO properties	Bath Chronicle article: http://www.thisisbath.co.uk/Huge-support-planning-curbs-HMO-properties/story-16681934-detail/story.html
6/9/12	B&NES webpages	Bath Chronicle article: http://www.bathnes.gov.uk/services/housing/landlords-and-tenants/additional-licensing
11/9/12	Bath & North East Somerset: 'No changes' expected to licensing proposals despite consultation	Residential Landlords Association (RLA) website: http://www.rla.org.uk/landlord/newsletter/CampaignWatchSep2012.shtml?story=8&key=irfkssjfzu#story8
14/9/12	Breeze FM	Interview with Cllr. Tim Ball
14/9/12	Have your say on new rules for houses in multiple occupation	Council web pages: http://www.bathnes.gov.uk/latestnews/have-your-say-new-rules-houses-multiple-occupation
19/9/12	People have their say on new rules for houses in multiple occupation	B&NES intranet: http://intranet/news/people-have-their-say-new-rules-houses-multiple-occupation
20/9/12	Consultation on Houses of Multiple Occupancy has started	Local Liberal Democrats website: http://widcombelibdems.mycouncillor.org.uk/2012/09/20/consultation-on-houses-of-multiple-occupancy-has-started/
24/9/12	Shared housing to feature in road show	Bath Chronicle article: http://www.thisisbath.co.uk/Shared-housing-feature-roadshow/story-16948492-detail/story.html
1/10/12	Further debate for Bath HMO growth controls	Bath Chronicle article: http://www.thisisbath.co.uk/debate-Bath-HMO-growth-controls/story-17015586-detail/story.html

		B&NES intranet: http://intranet/news/further-debate-bath-hmo-growth-controls
9/10/12	Be good neighbours', Bath students urged	Bath Chronicle article: http://www.thisisbath.co.uk/8216-good-neighbours-8217-Bath-students-urged/story-17056331-detail/story.html#comments
11/10/12	Landlord licensing meeting	Bath Chronicle article: http://www.thisisbath.co.uk/Landlord-licensing-meeting/story-17069262-detail/story.html
17/10/12	BBC Radio Bristol	Interview with Cllr. Tim Ball
17/10/12	Date reminder for HMOs consultation	Bath Chronicle article: http://www.thisisbath.co.uk/Date-reminder-HMOs-consultation/story-17100317-detail/story.html
17/10/12	Twitter	15 - 20 tweets to plug the road shows and also the approaching deadline for the consultation.
18/10/12	More HMO red tape could deter investors	Bath Chronicle article: http://www.thisisbath.co.uk/HMO-red-tape-deter-investors/story-17110698-detail/story.html
8/11/12	It's the council's job to enforce regulations	Bath Chronicle article: http://www.thisisbath.co.uk/s-council-s-job-enforce-regulations/story-17268087-detail/story.html
22/11/12	Regulations won't help key issues	Bath Chronicle article: http://www.thisisbath.co.uk/Regulations-won-t-help-key-issues/story-17392837-detail/story.html
24/11/12	Quality homes - mixed communities	Bath Chronicle article: http://www.thisisbath.co.uk/Quality-homes-mixed-communities/story-17412332-detail/story.html
26/11/12	Students: Tarded with the Same Brush.	Bath Chronicle article: http://www.thisisbath.co.uk/Students-Tarred-Brush/story-17426556-detail/story.html#comments
	General information	B&NES website: www.bathnes.gov.uk/housing www.bathnes.gov.uk/hmos www.bathnes.gov.uk/hmo

Communications Summary (Communications and Marketing)

Comms Opportunity	Media (print and websites)	Internal Comms	Council Website & Twitter	Broadcast (TV & Radio)
Have your say on new rules for houses in multiple occupation	Thisisbath.co.uk Nowbath.co.uk Bath Chronicle	Internal Website Staff Matters	Yes	BBC Radio Bristol Breeze FM Cllr Tim Ball

Annex III

Online questionnaire equality monitoring summary results compared to population figures (2 pages)

More information about you (optional)

Are you

Option	Count	Crown Copyright 2012
Male	49% (99)	49%
Female	46% (93)	51%
Prefer not to say	6% (12)	

How old are you?

Option	Count	Crown Copyright 2012
Prefer not to say	8% (17)	
under 25 years old	3% (6)	17%*
25 - 34	6% (12)	11%
35 - 44	12% (24)	13%
45 - 54	19% (38)	13%
55 - 64	23% (46)	12%
65 - 74	27% (55)	9%
75 - 84	1% (3)	6%
85 +	0% (0)	3%

*Census figure for 15-24 year olds

Do you consider yourself to be disabled?

Option	Count	Census 2011**
Yes	3% (6)	18%
No	86% (170)	82%
Prefer not to say	11% (21)	

** 2011 UK census figure for people with a limiting long term illness (13% for those of working age from 16-65).

How do you define your ethnicity?

Option	Count	Crown Copyright 2011
Prefer not to say	12% (23)	-
White British	84% (165)	88.07%
White Irish	1% (2)	0.73%
White Eastern European	0% (0)	-
Gypsy or Irish Traveller	0% (0)	-
Any other White background	2% (3)	3.66%
Black Caribbean	0% (0)	0.51%
Black African	0% (0)	0.90%
Other Black background	0% (0)	0.11%
Indian	1% (1)	1.97%
Pakistani	0% (0)	0.56%
Bangladeshi	0% (0)	0.23%
Chinese	0% (0)	0.45%
Other Asian background	0% (0)	0.28%
Arab	0% (0)	-
Any other ethnic group	0% (0)	0.96%
Mixed: White and Black Caribbean	0% (0)	0.51%
Mixed: White and Black African	1% (1)	0.28%
Mixed: White and Asian	1% (1)	0.51%
Any other Mixed background	0% (0)	0.39%

Sources:

- Census 2011 First Release - Key findings for Bath and North East Somerset. All data sourced from Census Statistical first release, and NOMIS Labour Market profile © Crown Copyright 2012
- The Population of Bath and North East Somerset November 2011. All data sourced from ONS Mid-year populations estimates 2010 © Crown Copyright 2011

Annex IV

Stakeholders' workshop report attached separately

Annex V

Consultation events report attached separately

Annex VI

Online questionnaire – multiple choice response summary (8 pages)








Tell us about yourself

The Council is proposing to licence shared HMOs centred around the Oldfield, Westmoreland and Widcombe areas of Bath.

Relevant documents:

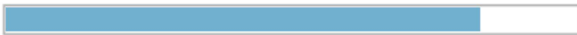
- ▶ [Consultation document](#) including definition of a HMO, exemption and exceptions from the proposals;
- ▶ [Map of the proposed additional licensing area](#)
- ▶ [List of roads proposed to be included in the scheme](#)

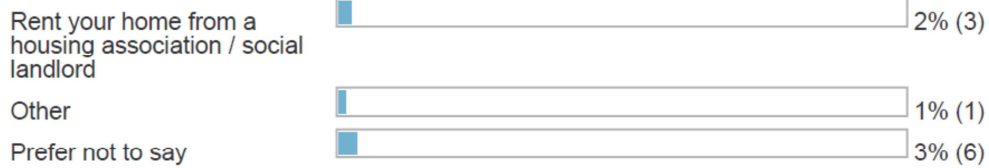
Are you..

Option	Results
A resident of the proposed additional licensing area	 50% (135)
A resident of B&NES	 36% (97)
A landlord	 31% (85)
A letting agent	 2% (6)
Representing a business or organisation	 4% (11)
Other	 2% (5)
Prefer not to say	 2% (5)

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

About the house you live in - do you?

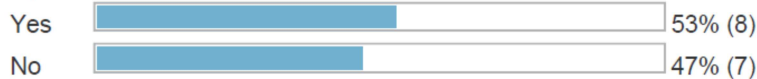
Option	Results
Live in your own home	 83% (146)
Rent your home privately from a landlord or agent	 11% (19)



- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Does your organisation cover or have premises in the proposed additional licensing area?

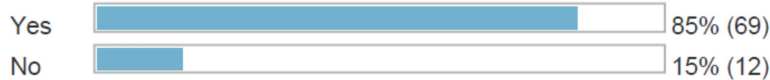
Option Results



- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Do you let property in the proposed additional licensing area?

Option Results



- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

So we can verify that you are a real person - please provide your email address below.

This question has been answered 248 times.

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Should the Council proceed with an additional HMO licensing scheme?

The aim of the proposed additional licensing scheme is to improve the standards and management of houses in multiple occupation and reduce the impact on occupants and local residents. The HMO will have to meet certain standards of health, safety and welfare. Conditions will be placed on managers to ensure standards are met such as adequate toilets, kitchen facilities and smoke alarms. The Council can prosecute landlords for not meeting their licensing conditions.

Additional licensing will require landlords to apply to the Council for a licence in order to operate legally. Landlords will have to declare any unspent convictions and breaches of housing law and this will be considered against whether they can be declared 'fit and proper' to manage a HMO. Management arrangements will also have to be satisfactory to the Council. If they are not the Council can step in and take over control of the property.

Some landlords believe that licensing is a bureaucratic process which puts an unnecessary financial burden on landlords and will have little benefit. In addition, the recent Private Sector Housing Stock Condition Survey also indicated that the physical condition of HMOs in B&NES is similar to that of other private rented housing. However, the Council consider that the wider benefit of additional licensing to tenants and local residents outweighs the expressed concerns.

Relevant documents

- ▶ [Consultation document](#)
- ▶ [Evidence report](#)

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Do you agree that additional licensing will improve the condition of HMOs?	<input type="range" value="20"/>				
Do you agree that additional licensing will help improve the local area?	<input type="range" value="20"/>				
Do you agree that additional licensing will improve management of HMOs?	<input type="range" value="20"/>				
Do you agree the evidence shows that a significant proportion of the HMOs in the selected area are being managed sufficiently ineffectively to cause problems for occupants or members of the public?	<input type="range" value="20"/>				

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

How should we do it?

The Council is investigating whether to introduce additional licensing of HMOs centred around Oldfield, Westmoreland and Widcombe. This area has been chosen because it contains the highest concentration of HMOs with shared facilities in B&NES. Please look at the detailed map and list of roads of the proposed area. Within this area the Council are proposing to licence all HMOs except buildings converted entirely into self-contained flats and purpose built student accommodation.

Relevant documents:

- ▶ [Map of the proposed additional licensing area](#)
- ▶ [List of roads proposed to be included in the scheme](#)

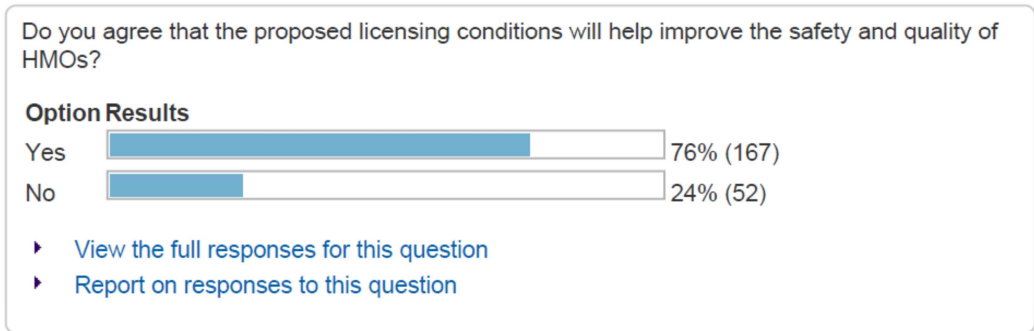
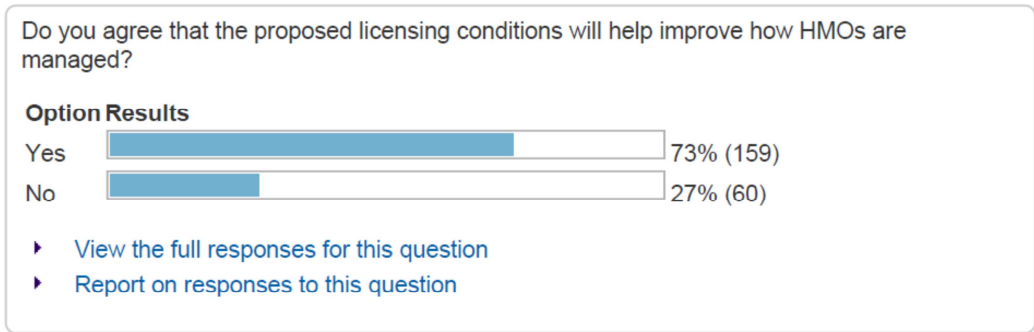


We will offer advice and support to help landlords throughout the licensing process and to comply with all housing legislation. We also currently offer landlords online training and information as well as a free landlord manual at www.privatehousinginformation.co.uk

What other help and support do you think we should be offering landlords whose properties will need a licence?

This question has been answered 104 times.

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)



Would you like to see any changes to these proposed conditions or do you have any suggestions?

This question has been answered 119 times.

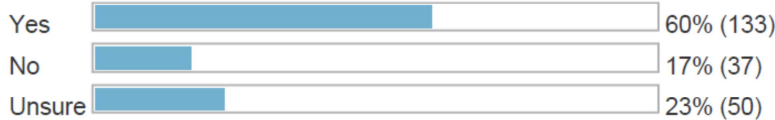
- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

In B&NES, a large amount of housing has poor energy efficiency which can be improved to reduce fuel bills and carbon dioxide emissions which is part of the Council's overall vision.

Most properties require an Energy Performance Certificate (EPC) which tells the tenants and owners how energy efficient their home is and how it can be improved. We are proposing to require that all licensed HMOs improve their energy efficiency rating where recommended by the EPC report.

Do you agree that it is a good idea to improve the energy efficiency of HMOs within the scheme?

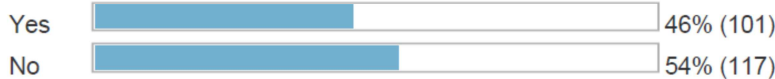
Option Results



- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Do you think the fee structure looks appropriate?

Option Results



- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)




Do you have any suggestions about the fees structure, for example, some people think we should offer discounts where landlords behave in a professional manner and save the Council time and resources.

This question has been answered 148 times.

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Vulnerable people

Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community?

Option	Results
Positive impact	 51% (109)
Negative impact	 18% (39)
Don't know	 30% (64)

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

Other comments

Would you like to make further comments on additional licensing?

This question has been answered 90 times.

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)



Would you like to be kept informed about additional licensing?

If you would like a copy of the Council's decision please enter your email address below.

This question has been answered 150 times.

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)




Would you like to be kept informed and be part of future discussions regarding additional licensing?

Option	Results
Yes - please enter your email address below	 73% (139)
No	 27% (52)

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)





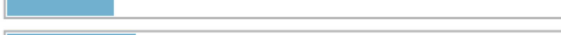

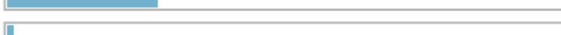


More information about you (Optional)

Are you

Option	Results
Male	 49% (99)
Female	 46% (93)
Prefer not to say	 6% (12)


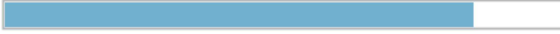




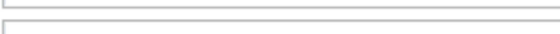




- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

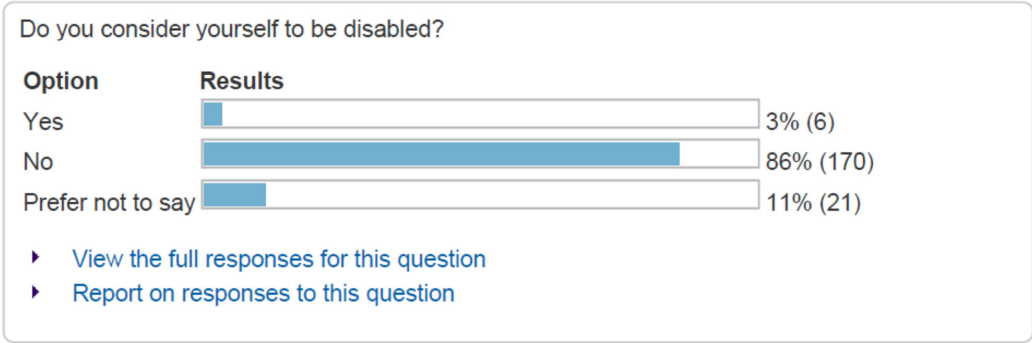
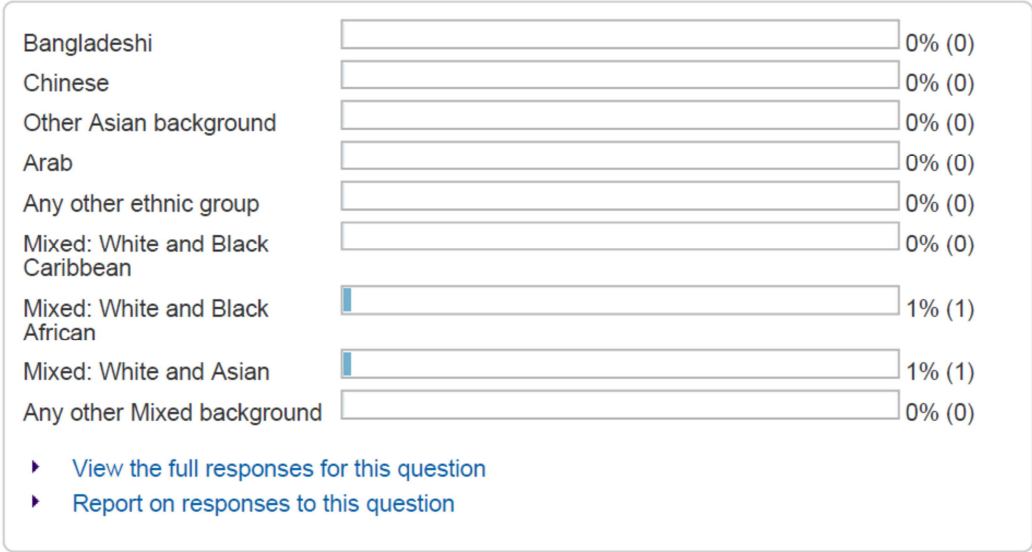
How old are you?

Option	Results
Prefer not to say	 8% (17)
under 25 years old	 3% (6)
25 - 34	 6% (12)
35 - 44	 12% (24)
45 - 54	 19% (38)
55 - 64	 23% (46)
65 - 74	 27% (55)
75 - 84	 1% (3)
85 +	 0% (0)

- ▶ [View the full responses for this question](#)
- ▶ [Report on responses to this question](#)

How do you define your ethnicity?

Option	Results
Prefer not to say	 12% (23)
White British	 84% (165)
White Irish	 1% (2)
White Eastern European	 0% (0)
Gypsy or Irish Traveller	 0% (0)
Any other White background	 2% (3)
Black Caribbean	 0% (0)
Black African	 0% (0)
Other Black background	 0% (0)
Indian	 1% (1)
Pakistani	 0% (0)



Annex VII

Grouped responses (3 tables)

Group responses to the online questionnaire									
Questions	Grouped responses								Available answers
	Resident of proposed area		Resident of B&NES		Businesses and organisations		Other / prefer not to say		
	%	No.	%	No.	%	No.	%	No.	
Do you agree that additional licensing will improve the condition of HMOs?	71.31	87	62.07	18	10	8	0	0	Strongly Agree
	18.03	22	17.24	5	26.25	21	25	2	Agree
	4.1	5	3.45	1	11.25	9	12.5	1	Neutral
	2.46	3	6.9	2	28.75	23	12.5	1	Disagree
	4.1	5	10.34	3	23.75	19	50	4	Strongly Disagree
Do you agree that additional licensing will help improve the local area?	70.49	86	58.62	17	8.75	7			Strongly Agree
	18.85	23	17.24	5	18.75	15	12.5	1	Agree
	1.64	2	3.45	1	15	12	25	2	Neutral
	4.1	5	10.34	3	28.75	23			Disagree
	4.92	6	10.34	3	28.75	23	62.5	5	Strongly Disagree
Do you agree that additional licensing will improve management of HMOs?	68.03	83	55.17	16	7.5	6	0	0	Strongly Agree
	17.21	21	24.14	7	25	20	25	2	Agree
	8.2	10	3.45	1	13.75	11	12.5	1	Neutral
	1.64	2	3.45	1	23.75	19	0	0	Disagree
	4.92	6	13.79	4	30	24	62.5	5	Strongly Disagree
Do you agree the evidence shows that a significant proportion of the HMOs in the selected area are being managed sufficiently ineffectively to cause problems for occupants or members of the public?	75.41	92	51.72	15	5	4	0	0	Strongly Agree
	12.3	15	13.79	4	25	20	25	2	Agree
	5.74	7	3.45	1	22.5	18	12.5	1	Neutral
	2.46	3	10.34	3	22.5	18	0	0	Disagree
	4.1	5	20.69	6	25	20	62.5	5	Strongly Disagree
Do you agree that the scheme should cover HMOs with shared facilities and not include buildings converted into self-contained flats and purpose built student accommodation?	47.06	56	35.71	10	10.26	8	16.67	1	Strongly Agree
	23.53	28	28.57	8	14.1	11	0	0	Agree
	12.61	15	10.71	3	17.95	14	16.67	1	Neutral
	9.24	11	17.86	5	25.64	20	16.67	1	Disagree
	7.56	9	7.14	2	32.05	25	50	3	Strongly Disagree
Do you agree that we are targeting the right area for this scheme?	65.55	78	17.86	5	6.41	5	0	0	Strongly Agree
	21.01	25	28.57	8	28.21	22	16.67	1	Agree
	5.04	6	7.14	2	20.51	16	33.33	2	Neutral
	4.2	5	21.43	6	15.38	12	16.67	1	Disagree
	4.2	5	25	7	29.49	23	33.33	2	Strongly Disagree
Do you agree that the proposed licensing conditions will help improve how HMOs are managed?	7.89	9	21.43	6	60	42	75	3	No
	92.31	108	78.57	22	40	28	25	1	Yes
Do you agree that the proposed licensing conditions will help improve the safety and quality of HMOs?	5.98	7	21.43	6	51.43	36	75	3	No
	94.02	110	78.57	22	48.57	34	25	1	Yes
Do you agree that it is a good idea to improve the energy efficiency of HMOs within the scheme?	4.27	5	7.14	2	38.03	27	75	3	No
	26.5	31	14.29	4	21.13	15	0	0	Unsure
	69.23	81	78.57	22	40.85	29	25	1	Yes
Do you think the fee structure looks appropriate?	40.17	47	33.33	9	82.86	58	75	3	No
	59.83	70	66.67	18	17.14	12	25	1	Yes
Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community?	20.61	26	26.92	7	46.27	31	0	0	Don't know
	10.43	12	19.23	5	26.87	18	100	4	Negative impact
	66.96	77	53.85	14	26.87	18	0	0	Positive impact

Responses from online questionnaire grouped by inside and outside proposed area

Questions	Grouped responses				Answer
	Inside area		outside		
	%	No.	%	No.	
Do you agree that additional licensing will improve the condition of HMOs?	50	110	25	3	Strongly Agree
	21.36	47	16.67	2	Agree
	6.36	14	8.33	1	Neutral
	11.36	25	33.33	4	Disagree
	10.91	24	16.67	2	Strongly Disagree
Do you agree that additional licensing will help improve the local area?	49.09	108	8.33	1	Strongly Agree
	18.64	41	33.33	4	Agree
	6.36	14	8.33	1	Neutral
	13.18	29	25	3	Disagree
	12.73	28	25	3	Strongly Disagree
Do you agree that additional licensing will improve management of HMOs?	46.82	103	8.33	1	Strongly Agree
	20.91	46	25	3	Agree
	10	22	8.33	1	Neutral
	8.64	19	33.33	4	Disagree
	13.64	30	25	3	Strongly Disagree
Do you agree the evidence shows that a significant proportion of the HMOs in the selected area are being managed sufficiently ineffectively to cause problems for occupants or members of the public?	50	110	8.33	1	Strongly Agree
	17.27	38	16.67	2	Agree
	11.36	25	16.67	2	Neutral
	10.45	23	8.33	1	Disagree
	10.91	24	50	6	Strongly Disagree
Do you agree that the scheme should cover HMOs with shared facilities and not include buildings converted into self-contained flats and purpose built student accommodation?	33.95	73	9.09	1	Strongly Agree
	20	43	45.45	5	Agree
	13.49	29	27.27	3	Neutral
	17.21	37	9.09	1	Disagree
	15.35	33	9.09	1	Strongly Disagree
Do you agree that we are targeting the right area for this scheme?	40.47	87	9.09	1	Strongly Agree
	24.19	52	36.36	4	Agree
	10.7	23	9.09	1	Neutral
	10.7	23	9.09	1	Disagree
	13.95	30	36.36	4	Strongly Disagree
Do you agree that the proposed licensing conditions will help improve how HMOs are managed?	24.88	51	63.64	7	No
	75.12	154	36.36	4	Yes
Do you agree that the proposed licensing conditions will help improve the safety and quality of HMOs?	20.98	43	54.55	6	No
	79.02	162	45.45	5	Yes
Do you agree that it is a good idea to improve the energy efficiency of HMOs within the scheme?	14.08	29	36.36	4	No
	23.3	48	9.09	1	Unsure
	62.62	129	54.55	6	Yes
Do you think the fee structure looks appropriate?	51.96	106	81.82	9	No
	48.04	98	18.18	2	Yes
Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community?	29.8	59	60	6	Don't know
	16.67	33	10	1	Negative impact
	53.54	106	30	3	Positive impact

Responses to online questionnaire from tenants that privately rent			
Questions	Responses from tenants privately renting		Answer
	%	No.	
Do you agree that additional licensing will improve the condition of HMOs?	18.75	3	Strongly Agree
	31.25	5	Agree
	12.5	2	Neutral
	6.25	1	Disagree
	31.25	5	Strongly Disagree
Do you agree that additional licensing will help improve the local area?	18.75	3	Strongly Agree
	25	4	Agree
	6.25	1	Neutral
	18.75	3	Disagree
	31.25	5	Strongly Disagree
Do you agree that additional licensing will improve management of HMOs?	18.75	3	Strongly Agree
	25	4	Agree
	18.75	3	Neutral
	0	0	Disagree
	37.5	6	Strongly Disagree
Do you agree the evidence shows that a significant proportion of the HMOs in the selected area are being managed sufficiently ineffectively to cause problems for occupants or members of the public?	18.75	3	Strongly Agree
	18.75	3	Agree
	12.5	2	Neutral
	25	4	Disagree
	25	4	Strongly Disagree
Do you agree that the scheme should cover HMOs with shared facilities and not include buildings converted into self-contained flats and purpose built student accommodation?	6.25	1	Strongly Agree
	31.25	5	Agree
	12.5	2	Neutral
	12.5	2	Disagree
	37.5	6	Strongly Disagree
Do you agree that we are targeting the right area for this scheme?	12.5	2	Strongly Agree
	12.5	2	Agree
	31.25	5	Neutral
	18.75	3	Disagree
	25	4	Strongly Disagree
Do you agree that the proposed licensing conditions will help improve how HMOs are managed?	46.67	7	No
	53.33	8	Yes
Do you agree that the proposed licensing conditions will help improve the safety and quality of HMOs?	46.67	7	No
	53.33	8	Yes
Do you agree that it is a good idea to improve the energy efficiency of HMOs within the scheme?	20	3	No
	20	3	Unsure
	60	9	Yes
Do you think the fee structure looks appropriate?	73.33	11	No
	26.67	4	Yes
Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community?	21.43	3	Don't know
	57.14	8	Negative impact
	21.43	3	Positive impact

Annex VIII

Free text responses to online questionnaires (35 pages)

Index to questions

- **What other help and support do you think we should be offering landlords whose properties will need a licence?**
- **Would you like to see any changes to these proposed conditions or do you have any suggestions?**
- **Do you have any suggestions about the fees structure, for example, some people think we should offer discounts where landlords behave in a professional manner and save the Council time and resources.**
- **Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community? Please give us more detail on who you think will be positively or negatively impacted by additional licensing and why?**
- **Other comments. Would you like to make further comments on additional licensing?**

We will offer advice and support to help landlords throughout the licensing process and to comply with all housing legislation. We also currently offer landlords online training and information as well as a free landlord manual at www.privatehousinginformation.co.uk

What other help and support do you think we should be offering landlords whose properties will need a licence?

Financial support for basic requirements to achieve any new standards

Awareness days within communities and for intermediary agents

These boundaries will increase until the whole of Bath is covered. All students cannot just be pushed out of Town. Awful=planning permission required & change of use & HMO. Much easier solution=improve the system already in place! Accreditation scheme is great + already up + running! Should become mandatory; raise the profile + investment in the scheme. All HMOs have to sign up + improve in order to gain stars-5 star system? Then things actually improve for students + neighbours, it is about education not just restriction!

I have made a suggested change to the below text.

Neighbours

The landlord agrees to take reasonable steps to minimise any nuisance, alarm, harassment or distress that may be caused to neighbours by the way the property is used. In the event that there are justified complaints of noise, or any harassment or distress caused to neighbours, or the local community, the landlord will work with the police and other local agencies in addressing these matters.

A telephone service should be available, as well as a drop in clinic at the Council Connect One Stop Shop, for those less comfortable with the internet

A staggered fee payment OR no fee at all as the landlords will only put the rental cost up to cover charges.

The house I let was my home whilst I worked in Bath. It is kept to that same standard and is accredited with you. I manage my own tenancy and have never had any problems with tenants or tenants with me. In my opinion to embark on a new licensed scheme is a complete waste of money. If you have bad landlords then sort them out, do not tar everyone with the same brush.

List of approved contractors

Grants to the upkeep of their houses taking over from council housing

Info regarding lack of resident parking space and impact of additional cars used by HMO on existing residents and the local environment

For landlords who live a distance away from their property a monitoring service could be implemented to check that their property is being respected and the front gardens are kept free of rubbish.

A set of guidelines that state that the landlord/owner should be responsible for the maintenance of both the house and grounds. Ultimately I believe Landlords should be made to keep the external appearance of the property to a reasonable standard. This should include front and rear gardens, exterior of property and any outbuildings

Grants to meet any additional costs incurred

Guidance on specific terms that should be included within their contracts with whom they let their properties to ensure they are aware of what would be legally required

<p>The problem landlords are the absentee or the old. The licencing should put responsibility jointly with the letting agents who charge extortionate fees and do very little to earn them. The key issue needs to be to avoid increasing housing costs. As a personal example; this year from the student loans company I will receive £4500 my rent last year was £4100 for 1 bedroom of a 4 bed house in Twerton. While we have the summer to earn, it's getting harder than ever to find work</p>
<p>How to manage troublesome Tenants</p>
<p>Grants</p>
<p>I don't think licensing will help as the reputable landlords will license and those you wish to target won't bother so the problem stays the same</p>
<p>If not included ban on smoking in their properties.</p>
<p>Your own analyst showed landlords were more willing to carry out works when a grant was provided</p>
<p>It is mostly the HMOs that are run by an agency that are causing these problems. More has to be done on the management of these properties by the agencies and not be there just to find tenants and collect the rent.</p>
<p>none</p>
<p>You do a great job already. There is no need for additional bureaucracy, and additional expense. Your accreditation scheme is good and should be retained. Any additional costs for landlords will be funded by students, who are already hard pressed.</p>
<p>Allow discretion and not nit-pick over trivial 'problems'. Keep form design simple. Send landlords a 'hard-copy' of their applications for future reference.</p>
<p>None because I don't think we should be encouraging landlords to add to their portfolio of student houses/accommodation. The council lose revenue for every house that is converted to HMO's, also the rate payers have the additional burden to make up the short fall of rates that the council need to run Bath successfully. People who live next to these houses have additional nuisance noise at all times of day and night and unsightly rubbish making the area that they live in dirty and untidy.</p>
<p>It is not just the landlord and their residents you should be looking at. You should be factoring harmony with the local communities and making it easier for them to register problems particularly out of hour issues to be resolved immediately. Perhaps a 24 hour response number to the landlord. Info to resident on how to be considerate neighbours.</p>
<p>Make it expensive so it acts as a barrier to entry to the market in order to slow conversion of family suitable homes into HMOs. Make littering part of conditions.</p>
<p>I have lived close to a house with multiple tenants (approx. 7) and they took up the whole street with their cars (approx. 5 - one untaxed). Where students are involved I think there should be some control restricting the number of vehicles per house ... preferably no more than one.</p>
<p>All the usual safety regulations but also a stronger agreement between the landlord and his tenants in relation to unsocial behaviour and rubbish collection and garden maintenance; maybe via part of your license to him and an extra deposit by the tenants specifically for these aspects - 2 strikes and the deposit is gone!</p>
<p>In my opinion the landlords (many who don't reside in Bath) only care about one thing and that is to maximise income from the properties. They have no interest in the wellbeing of the local residents who have to endure the noise, mess and inconvenience caused by their tenants. I do however think that a full list of those responsible for the properties should be compiled so that any complaints could be made directly to them.</p>
<p>I believe that you should be able to impose fines on landlords who do not keep their properties in good order and whose tenants are not considerate of neighbours and their locality.</p>
<p>I believe that restricting the licensing to the areas shown will only encourage landlords to purchase and convert smaller/cheaper houses in other areas such as Southdown, Whiteway, Twerton, etc, and the current problems will arise in those areas. The plan should be extended to all suburbs of the city.</p>

Think that the Council should focus primarily on landlords that own multiple properties. That landlords should be given a reasonable timescale to bring (if necessary) properties up to standard.
Strict guidelines and monitoring
Try and get landlords to join the accreditation scheme
This scheme will only penalise tenants and push us out of the city.
No extra help/support should be provided. The landlords are wealthy enough to buy the housing stock. More finance/support should be in place to help residents of Oldfield Park e.g. regular patrols day & night, fines/eviction for flouting of conditions i.e. '3 strikes and you're out'.
A landlord cannot be held responsible for the behaviour of his tenants. When tenants consider the house unsafe, they should pursue it via the landlord/agent. The council should not interfere with the commercial relationship, it should only have the right to prevent a conversion to HMO. Tenants are responsible for their own safety. The council should take a stronger line on individual residents who cause litter/vermin by not observing the litter collection regs. It is not the landlord's job.
Student households should have a 'main resident' to act as monitor to ensure that council-provided refuse and recycling provisions are observed.
Should enforce compliance with licensing laws with landlords e. g. Gas certificates
Online tutorials detailing compliance requirements and refuse control.
Talk to neighbours. Keeping everybody informed. Parking problems and parties. Gardens full of beer bottles and rubbish.
I find the question above a bit ambiguous as planning permission has just been refused for purpose built student accommodation at the bottom of West Avenue which we protested against. This is not the same as the buildings on the Lower Bristol Road Riverside. Advice on how to keep their properties in good repair including the gardens.
Information packs for residents. Monitoring of front gardens; entrances to properties; street outside properties.
Nothing. This is a business and they wouldn't do it if they didn't make a lot of money.
<ol style="list-style-type: none"> 1. Full information as to noise (less of) 2. Full notice to tenants as to what days are Council services and how rubbish/recycling is sorted. 3. RENT RESTRICTIONS APPLIED. 4. Monitor these conditions - no absent landlords.
A reasonable period to carry out necessary works, and perhaps some flexibility on room sizes, as I can see a lot of 4 bed houses becoming 3 bed houses with the result that landlords will charge the 3 more to get a similar return, and you'll have a need for even more student houses to accommodate the individuals who would have been the fourth tenant prior to licensing
It is impossible to answer these questions! There are too many options in the questions. You need to use someone who understands how to set up questionnaire questions!
None. People/organisations become landlords for personal gain. Ignorance is no protection in law. New requests should almost be treated in the same way as new build i.e. subject to planning application. Car parking consideration should be a part of that application.
I do not believe that a licence is necessary in this particular case.
Target those properties that are causing a problem. In many circumstances it is the tenant that creates problems by not putting rubbish out property, disconnecting alarms or smoke detectors, damaging doors etc. How will you apportion blame?
There should be reduced fees for Landlords who are long standing members of the Accreditation scheme. Also, as some of the administration covers checks into the Landlord and key holders, there should be reduced fees where a Landlord has multiple properties.

Inform them of the licensing of HMOs occupation in England guide for landlords and managers. Also any extras that the Council wish to impose.
I do not think it necessary to offer a licence to any more landlords. There are already too many multiple home ownership properties in the Oldfield Park area. Mostly these properties are occupied by students who do not care about the appearance of gardens front or back. Owner occupiers are disturbed in the middle of the night by loud parties and drunken behaviour. More consideration should be given to couples who are trying to eventually get onto the property ladder.
Don't know if you do it already but landlords should have to make themselves known to local homeowners and provide a contact number for complaints about noise etc.
I believe there should be CCTV cameras in areas with high concentrations of HMO to curb anti-social behaviour. There should be regular checks by the council to ensure they are following procedure and neighbours should be able to have a dedicated number/liason person to be able to report to.
Restriction on parking from hmos. Parking already an issue , not helped by multiple cars from one house
None
To support them in providing accommodation which the universities and council could not do to an adequate level. This is not to burden them with more costs which will inevitably be passed on to the tenant
Can it not be brought in as a provision of letting that the outside of the properties should be kept in good order as well as the interiors? Uncared for gardens, overflowing rubbish bins etc., lower the tone of any street and should be addressed by these landlords.
Please consider not just the landlords but also the residents of the area that has been affected by properties being rented by students this has impacted greatly on many residents lives
I do not think it is landlords who need training, but tenants who need better resources for dealing with problematic, ineffective, neglectful landlords.
Better control of standards of external properties
The area in which I live... Brougham Hayes/Lorne Road, formally a family oriented area... has been allowed to become a student enclave which has changed the ethos of the area for ever... if licencing can prevent unscrupulous landlords from operating then I am agreement with strict licencing.
There should be restrictions in the number of houses rented out to students in the same street. The houses in Calton Gardens that have been rented out to students are neglected by the landlords and left in a bad way. The whole street as a result looks shoddy and run down.
If student lets, university should be involved, as is the case when in halls of residence, i.e. rules to follow. I also feel there should be limits on how many houses are let in an area.
To provide the landlords with the information to pass onto the students about recycling and being good neighbours.
Awareness of timescales and compliance requirements. Obligation of tenants to consider neighbours with consideration to waste, noise, and car parking.
Listen to landlords already providing a good service and doing most of the things you want landlords to do. Talk to them and consider how they are succeeding and give incentives for them to carry on doing the right thing. This form and your questions make licensing sound like a done deal not a proposal. The help and support you could offer to landlords is not to charge high fees for those already complying with all the rules and regulations and giving a good service.
Reduce the charges so that more Landlords would be 'honest'. Reduce the renewal charge, drastically.
None
The council should send inspectors to HMO properties and offer advice to landlords / tenants on keeping the properties clean and tidy and how to correctly put rubbish out for collection etc. And also liaise with neighbours who may want to raise any issues regarding the property / landlord / tenants.
My property is managed. I trust the relevant information etc. will be provided to those managing properties.

Where let properties are next to resident houses, landlords could be encouraged to make contact with residents so they can be alerted to problems. Gardens and the outside of properties need to be maintained to the standard of residential houses or the whole area deteriorates.
I rather think that this is a whitewash and that you have already made the decision to go ahead and do this. Asking our opinion is meaningless , I find myself just going thought the motions of saying that you are wasting public money etc, etc.
Carrot & stick: Only landlords that have failed to meet reasonable standards should be required to obtain a licence (care should be taken to deal with complaints from malicious tenants) until such time until conformity is reached. Also prove (NLA style) accreditation within one year (say). Bona fide landlords should be left alone.
It would help if landlords could attend local resident meetings so they can understand the effects, good or bad, that the occupants of their properties have on the local areas
Sufficient existing powers are available to local authorities. Sufficient powers already exist to enable local authorities to deal with poorly managed/dangerous rental properties. A huge amount of information is available online and through organisations such as the NLA to support both landlords and tenants in achieving acceptable housing standards. The proposals suggest further and unnecessary regulation and expense into the private rental sector.
You already have powers to control housing and the environment. Article 4 does not require blanket implementation, It should be used selectively for individual properties when there is a problem with overcrowding. The high cost of the licence fee is also unacceptable, this cost would have to be passed on to the tenants!
This is totally unnecessary and useless legislation. Information will only serve to increase liability to enforcement and prosecution. Consequently landlords will be reluctant to become involved. This will reduce affordable properties to rent, causing inflation - look at what is happening in London. ONLY 35 OUT OF 400 LA'S ARE CONSIDERING THIS LEGISLATION.
None
None
None
None. Some landlords have may properties and run them as a business therefore should pay business rates
Perhaps publication of a statement of what actually constitutes National mandatory HMO licencing requirements.
None. The council provides adequate support. Landlords are running a business.
None. Landlords are running a business, there are very few businesses on BANES that get as much help & support that landlords of HMO'S get.
Performa of tenancy agreement which seeks to forestall all areas of nuisance and contention identified to date. To offer effective advice on identifying and quickly evicting recalcitrant individual not prepared to conform with expected reasonable behaviour.
None
None. Landlords run a business to make money therefore they should pay business rates
None
Offering a fee structure which recognises that most landlords have a portfolio of 6-20 properties. Some sort of fee reduction based on the number of properties would probably be helpful to such property owners.
Guidance on the exact definitions of Use Classes as defined in Statutory Instruments, and advice on submitting the necessary planning applications if there is a desire to exceed these limits.

As with accreditation the council should attempt to engage with the landlord before resorting to enforcement. Help from the relevant departments when tenants are exhibiting anti-social behaviour. Landlords need evidence in order to evict a tenant from his home. A poster giving details about recycling available for landlords to collect and display in July and/or delivered to properties in October. Reducing the fee. Other councils e.g. Swindon charge a lot less.
A checklist covering all requirements would allow landlords who are interested to ensure their properties comply, reducing the administrative overhead of the licensing office and allowing for inspections of all relevant properties to be completed in a shorted elapsed time. There are many properties to inspect and thus reducing the time per license inspection process would make a real difference. We have sent more detail via email.
A list of things that they should supply their tenants with e.g. a washing line and garden equipment or state that they should employ a gardener once a month to keep the gardens back and front tidy.
Landlords should be aware of licensing process and it would be up to them to make the enquiries to comply, &BANES should not be their total umbrella.
None
None
None. Landlords should pay business rates as they rent the house as a business. If they didn't do it as a business to make money they wouldn't do it.
None. Landlords run a business and should pay business rates.
The Council give good support to landlords. Nothing else needs to be given.
See additional documents
Would you like to see any changes to these proposed conditions or do you have any suggestions?
The areas targeted are principally the student occupied areas of the city. The proposals seek to institutionalise the accommodation and will deter students from living there. It will also increase the cost of providing rented accom there and landlords and students will seek to avoid this. I have clients that are already considering selling off their existing HMOs because of the admin and cost burden.
The current system of approvals and accreditation could be expanded, but excessive requirements for landlords to improve multi-occupancy properties will result in many of them being sold and thus reduce the amount of properties available in the PRS, which is not a good result.
Point out that all these areas fall within bath World Heritage Site and that property owners have a duty not to cause harm to the outstanding universal value of the site.
Landlords responsible for ensuring all recycling boxes (green blue and black for food) are available at the start of tenancy.
HMO status should only be applied to properties where the owner (i.e. landlord) does not live in the property. It should be made clear that accommodating a lodger in order to reduce pressures on the household budget should not be penalised through requirement of a HMO licence. In particular, the case of unmarried cohabiters.
Yes, no charge for houses which are already accredited
I operate to a good standard, and upgrade the facilities as required. I discuss with my tenants improvements that can be made and their opinions on my proposals. I therefore do not need any outside assistance in

keeping my house in very good order. I welcome any inspection you may wish to undertake.
Too onerous for landlords, who are likely to give their tenants notice to quit, & sell their properties
I think that the proposals are too much of an extra burden for landlords
I am concerned that you may demand impossible improvements. For example, we have insulated the roof of our property and installed double glazing but the EPC is disappointing. It is an oldish house.
As an accredited landlord I work very hard to continually improve my student let properties and ensure the students safety...why not expand the accreditation scheme with an annual visit (as they do in Plymouth university) to ensure conditions are met? I feel it very unjust to charge and indeed penalise me, in effect over £2000 per annum, for being an excellent landlord.
You are moving the problem to other areas who are the people making these rules and regs!
I suggest that the number of HMOs be limited to allow residents of these areas to be able to rent property that is otherwise reserved for students. Mainly those who will benefit from these proposed conditions are home owners in the area and not private renters.
The proposals are likely to force a significant number of landlords into the 'unofficial' market which will lower standards for tenants and also increase rents. I do not agree that the proposals should be implemented.
Other than stiff penalties for Landlords who do not comply with the regulations, no I think the proposed guidelines are sufficient. As long as the standards are maintained.
I realise that in all likelihood the cost of the licence will simply be passed on in increased rent. However, it would be good if, as a condition of the licence, the council published or kept a record against each rental property should someone else complain about rubbish being left out on the street for an extended period of time - so that the council could fine the landlord.
I feel the proposed conditions would be adequate
These are sensible proposals but due to the condition of most student houses in Bath, landlords will need time to make changes. Adequate guidance will need to be given on insulation to prevent issues of damp later.
The cost is quite substantial and this will be passed on to tenants. Accreditation offers the same quality control and is cheaper and therefore a better option. a five year licence will not improve quality long term as HMO's need regular maintenance and in 5 years can deteriorate a lot. I prefer accreditation and would support annual inspections.
I would wish to see a minimum standard of security included in these proposed conditions. A large proportion of HMO's is for students and it is known that they are targeted by burglars because they do one break in but gain multiple 'goodies'.
The council's efforts should be spent finding those landlords who do not follow the existing HMO laws and ensure that they comply. You don't need licensing to do this. It is just another paper work exercise
I would like to see a mandatory ban on any accommodation being built in roof spaces as this is very likely to cause an unacceptable level of noise in the neighbour's property.
I'm very concerned about accommodation provided in the roof space and would like to see a ban, or if not, some control over this development especially where, a full length of the roof, dormer window is to be built. I believe the noise from the roof space has a greater impact on neighbours. bedrooms
Why not make the requirements for voluntary accreditation mandatory. How can you now say that landlords that have met the council's voluntary code are now not good enough? In particular the proposals to comply with the EPC document will be very expensive. Will all landlords of HMO's be required to install double glazing? This is not reasonable and will not help the nuisances outlined.
Don't introduce them
Extend it to cover ALL existing HMO's-Otherwise the existing 6+Hmo's will escape regulation. Properties need to be spot checked during term time to prevent landlords exceeding their licence. More protection for

other residents is needed
We think it should be mandatory that landlords check regularly that conditions (such as garden upkeep, rubbish rules and recycling) are being met by tenants. We think that landlords be required to ensure their tenants do nothing to reduce the value of their own and adjacent properties.
Do not implement the new conditions proposed. This is simply a tax on students. Continue with and promote the accreditation scheme; the carrot is better than the stick.
Yes - you need to target the whole of Bath, not just your designated areas. This will only lead to the bad landlords buying up property in areas where they do not need licensing, just moving the problem from one area to another.
The negative references to using garages as accommodation is borne out of petty spite by a 'thorn-in-the-side' neighbour in Lorne Road. I have provided this type of accommodation because tenants have asked for it and is very popular; it does not affect the neighbours. Council staff inspecting them have been pleased with the results. Existing successful, legal accredited conversions should also be licensable.
.
I would like to see the requirement that outside areas be maintained to a proper standard extended to include decent maintenance of buildings.
Something on parking as currently Lorne Road is so packed with cars that emergency services would find it difficult to access and also something on landlords duty to deal with noise nuisance
I would like to introduce regular consultation with the neighbours affected by an HMO to enable them to give their opinion of noise, rubbish and general nuisance issues and for this to be used to consider a manager's fitness for the task.
What are you proposing to do to improve the noise levels from each HMO
This should be about the neighbours and neighbourhood just about assisting the landlords and the safety of their residents. The number of HMO's need to be restricted not just managed or you will have whole communities of council tax free HMO residents with the minority of very unhappy private owners who can't afford to move away.
If possible license needs to cover parking restrictions which turning smaller 2 bed houses into student accommodation for 6 students is causing. License should require landlords to as a minimum advise tenants on council services such as recycling. License should require landlord to maintain the land included in the property e.g. gardens which are currently being left full of rubbish & rubble
Stop more HMOs in our area.
HMO properties should be licensed for the use of up to two vehicles only, alleviating parking problems and addressing traffic congestion in Bath. Most HMOs have space for one (or at most two) cars to park outside the property. Landlords should be charged a high registration fee, used to cover some of the cost of the local services they use, which is paid for at present by local residents. These landlords are running profitable businesses and should pay for the services they use.
A limit to the number of HMOs in any one street, say 10%
The biggest issue here (in the Westmoreland ward along the Lower Bristol Road) is houses full of students. These are not going to be included in the scheme, so it doesn't seem very relevant to the situation here. The quality of housing used by students would be more relevant.
Whilst the proposed conditions will improve the welfare of the tenants and possibly how they treat the surrounding environment, it says nothing about managing the number of this type of property in any given area. This is one of the biggest issue surrounding HMO's, particularly student HMO's. What about that?
The council is responsible for providing containers and ensuring residents know when and how to put out their rubbish. Tenancy agreements are between adults, if tenants are incapable of being responsible for their own refuse then they should be penalised. For landlords that have their properties managed this seems

unnecessary. Consultation issues concern appearance, rubbish and local amenities. Proposed conditions don't address these concerns, with the exception of 11 and 12.
You need to include the whole of Bath or risk forling the problem on to other areas.
You need to include the whole of Bath or risk forling the problem on to other areas
The limitation of such properties is now required, particularly in Oldfield Park and near the Lower Bristol Rd. We are beginning to be a very limited local community
I want to see enforcement and monitoring, Before my home and community turns into an environment where no one wants to live.
Targeting landlords with fines and enforcement measures would be far more effective than Article 4. Existing HMOs will not be affected and as such any issues that are hoped to be addressed with this measure, that are specifically targeted at areas with a high concentration of HMOs, will be ineffective.
How is the council going to protect those of us who live and work in the city, contribute to it but can only afford to share our houses?
Enforcement...real enforcement
The council should not blame landlords for the behaviour of their tenants. This smacks of the council abdicating its responsibility to enforce its regulations on litter collection, and other civil regulations and by-laws. If a tenant breaks the rules, the council should direct punishment to him, not his landlord.
Am happy to area includes Twerton and Westmoreland as my understanding was that properties had to be three stories or more
I agree with the proposal however feel that to cover badly managed/maintained houses it should be for 2 or more occupants. It would be good to address the parking in Oldfield Park from all the HMO's at the same time as parking is impossible.
A much more open and less student orientated approach seems to be the best way to see through the proposals, without unnecessarily targeting a large proportion of those in BANES
Students should be housed on campus. Car parking. Noise issues
If the property has a 2 double bedroom and a box room does the house have sufficient space? Concerns that families cannot afford to live in a family house.
Charging landlords community charge.
Carry out ad-hoc inspections of properties to make sure they are up to standard.
Perhaps target letting agents instead of landlords.
Perhaps the proposed licensing scheme should be restricted to those HMO's where there is a minimum of 3 or more family units occupying the property. I believe 2 units is too small to be included.
Most of the emphasis seems to be on the landlords responsibilities, but they can't monitor rubbish etc. in gardens on a daily basis, so I think there could be more instruction for the tenants and their obligations
Yes, a better refuse policy set by the council. The current shambolic refuse system is now driving housing policy, because this licensing scheme is politically being driven more by refuse concerns than anything else.
My property in Faulkland Road has four ensuite letting rooms and was renovated to a high standard last year. Two of the rooms (without their ensuite) are not 6.5m2. Altering the property to compensate for this will be very costly. Please allow some consideration for special cases!
I am against the idea of imposing these conditions on landlords as ultimately the costs will be transferred to the students who cannot afford these kinds of additional expenses.
Include Trinity Road.
Assume landlords are innocent until proven guilty of providing sub-standard accommodation. This is a sledgehammer to crack a nut approach. Will you penalise tenants who deliberately obstruct or defy the rules/regulations?
I have had more problems with neighbours living in Somer (or the new name) than any students! Sort this

out first.
The additional licensing should cover the whole of the City not just 3 wards. There are many HMOs that have bedrooms in the loft space, with hardly any means of escape in the event of a fire only through a velux type window onto a slippery sloping roof. Also dormer rooms with the same problem. This needs urgent investigation before tragedy strikes. Fire regs also health and safety apply here (the Council has a duty to inspect).
Better policing of all HMOs to ensure conditions are met. If they are not, heavy fines for the landlords and possible court action.
I am afraid I don't care about the standards of hmos I care about the community and the attitudes and behaviours of students to local people and I'm not sure your plans would improve this
Proposing that periodic inspection reports for electrical installations are carried out every 5 years adds an unnecessary expense as regulations change so frequently, I was told by an electrician the other day that consumer units installed only 4 years ago are no longer compliant. Also, I question the point in spending money on EPCs and related improvements only for tenants to leave lights and appliances switched on when not needed.
This proposal is ill thought through and needs to be reconsidered: Under the current proposal, my property would become a HMO. I am a home owner who has up to two lodgers living with me. According to the current proposal I would need to: 1. Pay a license fee of over £600 a year 2. Attend a training course on how to manage a HMO 3. Additionally comply with an array of other time-consuming and costly conditions, despite the fact it's my private residence and I just happen to take in a few lodgers.
I suggest that all public footpaths in front of any HMOs should be kept clear of recycling boxes and any hedges cut back to prevent narrowing of footpath. Also rubbish be put out on the correct day instead of being left to block the footpath for days on end
These suggestions are fundamentally basic, and are applied by all good landlords anyway. My problem is the failure of the council to implement basic standards which already exist on BAD Landlords. Why up the standards when the standards at the moment aren't being enforced?
Please see my previous comments, which also are relevant here. Other than this, I think Oldfield Park and Brougham Hayes are absolutely deluged with rental properties and an official halt should be called now to any more letting out in these particular areas.
Regular consultation with the residents that live in the area to try to improve the area it is quite clear that the area of Oldfield Park and surrounding area has been affected by the fact that most of the properties are now rented and no longer family homes. Are BANES happy with this situation? It causes many problems and has had a great effect on the residents that have to live in the area .Why I am having to pay my council tax when the rented properties to students and landlords escape any cost
I think that there should also be regulation put in place regarding how long a landlord may leave household waste (IE old mattresses, dead refrigerators, etc.) in the tenant's housing/on the property.
Non control is making ghettos of certain areas, such Oldfield Park. Most landlords reside outside of Bath, therefore no money going back into the city, and they do not contribute towards Rates. Thus increasing the burden on the rest of the residence. Also there is an increase of vermin (rats) as none of the tenants have cats. Low cost housing is being is being creamed off by landlords, leaving nothing for first-time buyers.
The Landlords need to be more responsible to ensure that the property is well kept and the students checked on regularly
Make all landlords responsible for the upkeep of gardens and disposal of rubbish.
As above
If people who live in the areas in question are really serious about the number of student housing then there is an obligation on them not to sell to landlords who intend to let, or for them to agree to have planning consent for a change of use of their houses. By restricting the selling potential of the housing in this area,

<p>this problem could be brought under control.</p>
<p>We have tried all these things ourselves and we know what works and what does not work. What you are trying to do will not work. Our system works because we micromanage it and we manage our tenants. If you don't manage the tenants it makes little difference what the landlord does and from our experience with licensing the Council is unable to manage the third party on the license - the tenant.</p>
<p>Allow 'leeway' with some of the Regs when subject to the older Bath houses.</p>
<p>You should have assumed that every householder or resident in bath would agree with these proposals and therefore only those that disagree need to respond to this proposal. This would have resulted in a 99% in favour of the proposal. It is all too late. You have given the developers 12 months to convert as many houses as possible into HMO's. I now live in a recognised slum area and would like my council tax reduced to reflect this. Disillusioned resident, [REDACTED]</p>
<p>Would like to see them abandoned because the proposed fee is far too high. My landlord will add £15 pcm to my rent. I, and most other people, will see no benefit, just increased costs. Adding recycling, ventilation, good practice etc. is just extending the scope of the original HMO scheme for 3 storeys beyond what the Government intended and just for the sake of it. Some questions are loaded, how can I answer the next question about energy efficiency when it assumes I agree with the scheme?</p>
<p>Try to restrict the number of cars connected to any property.</p>
<p>The accreditation scheme appears to work well.</p>
<p>Target the bad Landlords. You know who they are. They do not belong to the NLA, they rent for the money, take no pride in their properties. They do not provide a gardener to maintain their gardens . Some don't live in Bath, don't check their properties monthly. We are on call 24/7 and our students have all our details. Accredited properties should be exempt from licensing. We do our best to keep standards high. Those who keep their heads down save money and they are the cause of the problem.</p>
<p>Its impractical to achieve the proposals in a mandatory manner being in mind the nature of many of the buildings. Why should the Council discriminate in this way to the advantage of company's that provide large scale student accommodation. Is the motivation to make us less competitive? I wonder why! In an age of shortage of accommodation. A reasonable way might be to use the existing arrangements to make improvements were possible over a period of time.</p>
<p>Proper enforcement where properties/residents are failing to conform</p>
<p>Yes. If you target failed landlords and poor properties you will have much less work to do. We suspect you are targeting ALL landlords only to raise funds from them, some of which will be spend of the poorer properties. A simple inspection LIKE THE ONE YOU ARE DOING ON TWO OF OUR PROPERTIES TODAY will easily tell you which are the good properties...most of which are accredited already. The questions on the questionnaire are loaded, I am forced to say NO when the answer is not simply YES</p>
<p>The minimum space for bedroom should be dropped</p>
<p>The questions are too vague. Many HMOs are already of a high standard so that they cannot be improved. Targeted poor HMOs will benefit from most of the licensing conditions.</p>
<p>Use existing powers to identify and target improvements on HMO's that do not meet adequate standards. Regarding the q below satisfactory energy efficiency improvements to old housing stock will be very difficult to achieve.</p>
<p>We strongly object to your proposals to licence HMO's</p>
<p>The safety regulations are ridiculously over specified. BANES has signed up to the LACORS agreement for fire alarms in HMOS. This runs to 84 pages of regulations. Mention the magic word HMO to the fire officer who is independent of any control and you will open up a floodgate of enforcement costing millions. My flat in The Paragon has 17 fire alarms in two story staircase and a control panel fit for a small hotel. They have even specified fire resistant paint on block and plaster walls,</p>

Council tax should be imposed on landlords, as residents already pay. Why do landlords not have to pay a business rate as they are profiting from their tenants
Landlords to pay business rates
Landlords to pay some council tax to cover services that local residents pay for.
All these proposed conditions are backed up by flimsy evidence - statements on greater risk of fire in HMO is actually contradicted through the statistics provided. Silly nannying statements like keeping gardens tidy and management of refuse are generally applicable to many non HMO properties and refuse collection generally in central Bath should be far better managed, putting out black bags even late at night is a recipe for disaster - drunks/pests.
Landlords run businesses they should pay business rates. Council tax should be paid either by landlord or occupants of HMO's. They receive the same services as those of us who pay council tax. For example student houses put out multiple bags of refuse often 8-10 per house, thus putting extra pressure on refuse collections. The Licensing controls need to be enforced.
As the landlords are running businesses they should pay business rates. The council collect no monies from these HMO's, and as the occupants put out up to 24 bags of rubbish, sometimes left for days/weeks. Then to be charged council tax does seem to be the answer. The licensing controls need to be enforced & paid for, so by charging council/business rates the residents will not have to pay.
Higher education must be seen for what it is, a big business. Landlords are profiting from this association and are running businesses therefore business rates should be applied to such enterprises. The HMO licensing requirement must be applied to the whole of Bath.
Landlords to pay council tax
I can see no logical reason why Landlords should be exempt from paying council tax as student HMO's receive the same services as all local residents.
Landlords should pay business rates, they are running a profitable business after all. Also council tax should be paid because tenants of HMO's have the same services as the residents of these areas who do pay council tax. BANES is therefore losing money.
I think the proposed conditions are broadly correct.
Adapt the existing accreditation scheme; target specific properties that are causing public nuisance to other local residents; use existing legislation; concentrate on compliance of the poorly performing landlords and tenants rather than increase regulation.
I believe that unless an owner or manager can show an approved planning decision allowing more than six residents in an HMO or can show a list of residents that proves that there are no more than six households even if there are more than six persons, then the maximum number of residents licensed must be six.
The more arduous or complex the requirements, the more difficult for landlords to comply readily. Expecting Victorian houses to achieve Grade C EPC is tough as improvements to reach this grade are expensive. Is the Government planning to make let property reach Grade E? What is envisaged for secure ventilation of habitable rooms? Putting the onus on the landlord to know current legislation as on the website must be accompanied by attempts to inform him and highlight changes on the website.
A list of all the landlords together with the properties they own, to be readily accessible, so any problems or complaints could be quickly rectified.
I feel the accreditation scheme should be mandatory. A small fee should be charged for accreditation, say £300 for 5 years. More pressure should be put on landlords, agents and occupants to meet the necessary standards and conditions. This in student houses should be backed up by the universities. Fines should be imposed where necessary.
Council Tax to be paid.
1. We are afraid it is all too late! 2. The area is now a slum3. We think that our Council Tax should be reduced

Council Tax to be paid either by landlord/occupants. Landlords to pay business rates. Student HMOs receive the same services as local residents but pay nothing for it.
Would prefer students to be housed at the university or with family homes as they are not paying for facilities through Council Tax. It would be even better if they were housed in blocks as on Lower Bristol Road. Maybe then there would be more houses available for first time buyers. There are meant to be family homes!
Licence fees higher. Business rates paid and Council Tax to be paid.
See additional documents
Do you have any suggestions about the fees structure, for example, some people think we should offer discounts where landlords behave in a professional manner and save the Council time and resources.
Far too expensive, what are we actually paying for. The intended beneficiaries are the community at large so it should be covered by the council tax. Otherwise it just makes rents higher
Do not implement the scheme
Renewal after 5 years of successful and compliant license holding to be at reduced rate
I would rather not see a reduced fee but in using the money so more effort and resource going into making the scheme work and sorting out the problems highlighted by the local residents in this report.
Vastly overcharging!!! IF the council actually cared a damn about safety or care of tenants they would insist this covered the whole of Bath. This is just a thinly veiled means of trying to justify these planning restrictions they intend to force on us all anyway!!! How dare they even try to charge so much!
The fees are insufficient if I understand correctly with the example given £705 for 5 years. This is ridiculously low for what is a commercial enterprise. It should be more like £250 a year. Perhaps with a partial refund for a well managed premises.
It seems that 2 unit property would not be classed as an HMO, with 2 cohabitees representing a household & an additional single occupier. This is therefore a misleading way to represent the fee. I am concerned that the costs of the licence will result in increased rent. In an already inflated private housing market, rents are expensive & budgets are squeezed. I would be interested in exploring the possibility of a regulated pricing scheme and limited yearly increases imposed.
No fees on accredited properties. Older properties are difficult to make energy efficient
This is a further unnecessary burden on landlords, who are already encouraged to accredit their student properties. The fee is outrageous and will only add further to the costs of students who are already having to meet significantly increased tuition fees.
It strikes me that you are not asking for my opinion or assistance on this matter has it seems obvious that you have looked into the matter so deeply to come up with such detailed fee structure. As I have said, I would expect you to have minimal involvement with me, so why should I pay. By all means charge those that do not run their lets professionally.
I do not think that there should be any fee whatsoever. If the council want this scheme, they should have to pay for it
There should be no fees payable by the landlords.
The landlords should pay council tax on their properties; it's disgusting that no council tax is claimed on so many student properties. The suggested fee is nothing compared to what we have to pay in council tax as residents
I agree there should be a discount structure for compliance within specified time periods

We have no idea how much the scheme will cost so how can we say? \\\We want our house to be safe and comfortable for students but we seem to be paying more and more each year to the Council for things we would do anyway.
The university works with the accreditation scheme so that I am recognised as an excellent landlord and it would indeed be a waste of time and money to regulate my properties AGAIN!
This is just another!
The students will be hit by the fees & £11.25 over 5 years is irrelevant. The Landlord has to find the fees upfront, and most will I'm sure pass them on. The many responsible Landlords who keep their accredited houses in a safe and well repaired manner will be hit because of the few. A licensed property is not necessarily a better home. It merely ticks the boxes.
No - it should remain a fixed fee.
I think that landlords should not be able to let their houses for more than the overall market rental for the size of the property. Any excess they receive in rents could be used to fund social housing for non-home-owners who would like to live in these areas.
There should be a transparent arrangement to demonstrate that the cost of fees is necessary to fund implementation of the scheme and that this is being undertaken efficiently. The cost could well be prohibitive for 'student housing'
Yes I do think good landlords should be offered an incentive. But I think it is important to come down hard on the bad ones
Would agree that there should be an incentive to reduce the fee on renewal - no complaints about the rubbish left when occupants move out, no rectification work needed to meet fire etc. conditions. I realise that landlords cannot be held responsible for the conduct of their tenants, however, they can reclaim fines etc. out of deposits. It is important that the council isn't out of pocket cleaning up after them and that other residents are also not out of pocket.
Duration of licence is too long 1 year should be offered as well
Definitely offer discounts when landlords are helpful - if the fees are high they're just going to be passed on to tenants.
None
Discounts for professional attitudes is a great idea - these proposals are going to completely change the type of landlord in Bath. It's going to punish some people heavily but is likely to improve standards overall.
Ridiculously expensive
After the landlord has held the license with no problems for 5yrs the fee should only an amount to cover the inspectors time, Landlords that don't keep to the rules should have to pay the full fee. There has to be an insensitive for good landlords.
Accredited properties should be much cheaper as it proves the landlord is responsible by adhering to this voluntary scheme
All of my properties have been accredited since outset. All documentation is up to date and there will be no benefit to me or my tenants other than paying a large sum to submit my documents again. Currently accredited properties should only pay a nominal fee if the scheme is implemented
It is too expensive and actually prevents some landlords from licensing because of the cost. One visit per five years does not cost £600 & £700 no matter how expensive the admin that goes with it. Having to pay as lump sums is also unfair and extremely difficult. Landlords should be able to pay the fees monthly.
Considering any fees implemented by the council for no reason will be passed directly on to tenants this will just lead to an increase in rents. So really no additional fees should be charged.
I think that landlords will just pass the cost of the fees onto the tenants by increasing the rent and therefore it won't be the landlords who pay the fees anyway.

No comment
I think it's a very good idea to offer some reduction to landlords who are good.
Yes a discount for no claims.
Landlords that behave in a professional manner should not have to fund the council for having to chase the landlords who are not being proactive in the running of their properties. Professional landlords should have reduced fees for being proactive. This would then give incentive also to all to landlords to be proactive and comply with the requirements.
A 2 unit property is charged at & £337.50 per unit yet a 10 unit is to be charged at & £91.50 - hardly seems fair
Discounts should not apply to keep the scheme self-funded but increases might apply if landlords have been deemed to be irresponsible. Or perhaps fines.
It is a tax. Students bring a lot of money to Bath; don't overburden them. Scrap this idea.
Depends what your idea of professional manner is - if you don't have to live next door to these people you may well feel they are being managed correctly, but not if you are the poor neighbour putting up with it only to find the place is magically tidied up before your visit.
The fee structure looks a bit expensive. I hope that the Council will do everything in its power to make this housing unit as efficient and tightly managed as possible keeping costs low. Once all the HMO's have been inspected / licensed presume the size of the unit could reduce. I hope that common sense can be used over 'minor' infringements and nit-picking to keep costs down.
A form of 'no claims discount' seems appropriate.
Far too low
Fees should be a lot higher to take into account the damage that an HMO can do to the area. Too many landlords see this as a quick moneymaking scheme and local neighbourhoods are being destroyed by their greed.
No I do not think landlords should be offered discounts, they make enough out of the students to pay this fee already
You are dealing with landlords making great profits. They should be up to scratch and charged for making sure they are good enough. They cost of resolving problems caused by their residence whether in labour or man hours should be charged to landlords and not picked up by council tax payers - of which this group often do not have to pay!
Fees are insignificant compared to rental prices and will not deter over population of HMOs. Fee should be related to number of rooms in house compared to number of bedrooms in original property size to deter such overpopulation
Higher gearing for additional rooms. Link to council tax band
Fee should be more.
The licence fee should be higher and used to cover the cost of the local services which are used by landlords. They are running profitable businesses but expect the local residents to help fund their businesses by paying for all the local services they use such as refuse collection, kerbside recycling etc.
Where student houses are concerned I feel that I am subsidizing their business, as students houses do not pay council tax. The fees should be higher. No discounts, It would help landlords of student houses to put something back into the community.
That sounds good. It would be also good to include in this landlords who behave responsibly towards the environment.
How can answer this without understanding what you will have to spend on administering and enforcing it? Do you know that this fee will cover all the costs that you will incur - if the answer is yes, then my answer is yes.

Why should landlords that have already chosen to meet safety requirements on their own pay for the council to enforce the standards on none compliant HMOs and landlords
Depends on your definition of landlords behaving in a professional manner
Depends on your definition of landlords behaving in a professional manner
The high proposed fees will simply increase the costs of renting and this will fall on relatively poor students and people on relatively low wages
To be direct, in view of what the landlord can earn from each property, the fee proposed for 3 individuals in 3 rooms over 5 years is nothing and will, I think, not hinder the expansion the local community would like to see with such properties. Bath now has a real shortage of first homes for young families/couples intending to have a family. It is quite out of balance.
I don't believe any discount should be given, I think they should be responsible for paying for the weekly waste collections and resources that are used by their tenants through council tax, this could be reclaimed from their tenants by means of the rental paid.
I think fees should be higher, but I agree with the above suggestion.
For see difficulties in how many people in HMO....Discounts could well be offered to landlords who for example have only one property....can't sell their house so rent it out for a short time.
For too long landlords have managed to make money without taking responsibility
Landlords who keep their houses in a respectable manner should not be made to pay fees.
The fees are very high. When compared to the fees of building control, which provides advice based on numerous visits, the HMO licence costs a lot.
This will reduce the number of shared houses available to us and put up rent costs. It will also increase the number of properties illegally let, off the record.
Should be more expensive
Licensing is a council initiative. Landlords should not incur an additional tax for it.
How would council become aware of unprofessional attitudes i.e. un kept front gardens and leaving recycling boxes un retrieved?
No, a license should cover all landlords behaving professional - those that don't shouldn't get their licence renewed.
Landlords should pay Council Tax
Cannot see why. Pay for work done.
It is too cheap
It should be the other way round - charge extra where landlords do not behave in a professional manner and save the Council time and resources.
I appreciate charges are limited by law but these landlords are running businesses and should pay business rates. Licences should be renewed annually. Any charges should represent the true cost of monitoring.
Landlords should pay the fee yearly so that they pay the fee with a cost of living pay rise. If they pay every 6 years you lose money and the landlord wins again.
I believe that this is another tax when to create economic growth in the housing market the council should consider pro- housing policies.
The Council should consider any financial benefits to local merchants etc. from having the higher density of population due to student and other renters. A basic fee of 500 pounds with increments of 50 for each occupant in excess of 3, ought to be acceptable to both Council and Landlord. Current fee structure in place I believe is too high. This may account for the low number of licenced HMO's. The fee needs to be realistic, manageable and not perceived as a deterrent to the program.
Discounts would encourage landlords to maintain high standards I think

The current accreditation system works fine. It is not necessary to introduce more taxation through licensing. And why could we not comment on the crazy idea to require EPC grade C level? Level C is not achievable in Victorian properties. This is just a policy proposal to kill off HMOs!
The fees should meet the full cost of running the licensing scheme + a contribution towards dealing with the problems (mess etc.) caused by HMOs
No exemptions. Yes above - Given that this provides sufficient funding to generate/police the process over the licence period.
I have a very reputable managing agent in Bath, and the house was also accredited for some years. I believe that together we maintain the house in an excellent condition. All our students so far have been very happy and what the council is proposing will be detrimental to the nature and heart of what a university student house means - namely a home where people come from different places but to live together as ONE family, not separate unit.
You first need to define your objectives. If it is to reduce the number of HMOs then this is not the right vehicle for doing so. Retain fee structure for HMOs with six and more tenants. Address other issues by tightening planning or exerting more pressure via the Environmental Health Department.
Where landlords don't comply or persistently offend then either licences should be removed or an increase rate made to the licence.
If properties comply with regs with no need for re visiting etc. then fees should be at a lower rate.
Discounts would be good for good landlords.
See earlier comments re fees and Accredited properties and multiple properties under one Landlord. In addition we cannot see the justification for renewal fees being at the same level as new Licences.
This is a pittance to a lot of landlords that put profit above tenant's safety. No discounts should be given in any case. The fees should reflect the amount of policing the Council will have to undertake to monitor the HMOs for fire reg and health and safety requirements, electrical and gas certification checks as the Council are supposed to carry out and vet to meet the minimum requirements for HMOs.
Landlords should pay Council Tax on these properties.
As before this is not an issue that concerns me, but I do think discounts for landlords that engage with the community would be a good idea
agree with above
I believe discounts should only be offered if landlords can behave in a professional manor or provide a service that benefits the community on a whole. If they can save the council time and resources, they should do this regardless.
Proposed fees are too high, yes I agree there should be discounts available, I have been a member of your accreditation scheme for over ten years.
Please see previous comments.
Industrial businesses have to have certain licenses for waste disposal and other things, they do not receive a discount, good or bad, a landlord is a business, where is the difference. I pay my council tax to support local services, not to give to landlords who make a living out of renting.
This fee however high or low will be passed on to the tenant. If landlords prove they meet these conditions why should they be charged anything?
I agree - compliant and good landlords should get a discount, bad landlords should pay more, which might dissuade them from buying to let in the first place!
Yes if a landlord has a record of good conduct, there should be a discount of up to 20% or so.
I think landlords should be charged more, when they keep rowdy and uncontrollable tenants.
Yes agree a discount would be appropriate under the circumstances
no discounts! fees should be higher and inspections more frequent!!
I agree

I do not think it is necessary. The landlord will be obliged to pass on the extra costs in higher rents which will make life more difficult for students who already have a huge debt burden. Many landlords cannot sell their home because of negative equity reasons and are forced to rent.
Considering the fact that HMO are purely a vehicle for profit, the licence fee should be set higher. Can the fee be set against the landlords' tax? If so, it certainly needs to be higher.
I think the fee structure is exorbitant and one must take into consideration that good landlords are regulating their own properties and are also council tax payers. Good landlords are being penalised by having to pick up the tab for bad landlords. If licensing should be approved then certainly there should be substantial discounts and incentives for landlords who comply and work to the spirit of the rules and regulations.
Reduce the first time fee and drastically reduce the renewal fee. Yes to discount for responsible / professional landlords.
The fee structure is adequate, but should be an annual charge. These landlords are making a fortune out of our misery.
Fees are outrageous. They will be rounded up and passed onto tenants in rent increases for no benefit to the majority, making rental accommodation even more expensive. Discounts will turn into punitive measures as they usually do, e.g. online tax returns etc. So I would be opposed to them in principle.
Like Council tax, the fees should be charged annually paid by direct debit, to spread the cost evenly, not charged in a lump sum for 5 years. The licence could still be for 5 years to save on administration and the d/d set up for 5 years.
Why offer discounts for a business man to do his duty? Unless you offer discount to my council tax as I always behave decently!! No I think you should fine landlords for NOT doing what is required of them, after all if the council failed in its duty you would be fined.
A large refund for those landlords who do not cause any trouble.
I agree with them. Caring Landlords save the Council time and money. They take a pride in having good quality accommodation. They insulate their roofs and provide double glazing and good heating, furnishings and fixtures. They buy A or B rated white goods. They educate their students.
I agree with the discount suggestion as mentioned
Yes, discounts upon inspection by the Council could be very effective.
Offer to a tired reduction where HMOs generate no complaints or problems, subject to an annual check.
This landlord is a professional landlord with high standards. We see this as an additional TAX. Your figures are WRONG. The students are only here 10 months of the year so that it is not £11. 25 PM but (for three) £705 divided by five = £141 divided by ten = £14.10 PCM. Also why do you state ' UP TO FIVE YEARS'. For what sinister reason are you choosing to phase it this way.....why not just state that 'for a licence FOR FIVE YEARS'
If you wish to alienate the majority existing responsible landlords then you have the perfect recipe. Target the poor HMOs only and make it self-funding. You are a monopoly in this endeavour, please don't treat the rest of us as ripe for the picking.
The fees proposed over 5 years should be annual fees
Fee structure seems excessive. will the money earned be ring fenced to support new HMO properties?
Ultimately tenants will pay fees through increased rentals or other charges. Council needs to closely justify fees and demonstrate how landlords may benefit from the additional expense. Perhaps a tenant's accreditation/licensing scheme for those on the council housing list with appropriate guarantees underwritten by the council would help.
There is no critical mass of people agitating for this unnecessary legislation. Make it £2000 which is only 10% of increase in the value that the property will enjoy if it has an HMO. Make it £20,000 to pay for the CLIP BOARD ARMY of inspectors, enforcers, legislators. If you want to give a discount subsidise the

tenants who will be paying for this.
Licence fees should be increased, which someone should check
No discount. Council will need to employ someone to see the licensing laws are carried out
No discount
No discount. The council will need to employ someone to check landlords that they are carrying out the licensing laws
As far as I can see and from the evidence presented, if any, the fee structure appeared to be the creation of a revenue stream for the local government. Nowhere is there a breakdown of how the figures were arrived at and how they are envisaged to be used, just general waffle. If you believe there is a problem with unregistered or poorly run HMO, tackle them through existing legislation and fine them accordingly.
No discount. The fee seems insufficient for a 5 year period. The council will have to employ someone to check that landlords adhere to the licensing laws. As no business rates are paid on HMO's, the council should seriously consider introducing business rates as well. The council is losing money on HMO's because no council tax is being paid either.
There should be no discount as the fee charged can go to pay someone to go around the HMO's to make sure the landlords are keeping their houses in order. No HMO should be owned by people who do not live in the BANES area. The name & telephone number of the householder to be displayed by the front door of the HMO.
The scheme must be self-funding, keeping the structure simple and uncomplicated should ensure that it is efficiently run with costs kept to a minimum. Areas of contention, such as discounts will only add to costs.
No discount
Definitely no discount
Fees should be higher, and discounts should not be offered
I do think some sort of reduction for the good landlords would be a good idea.
Agree with proportionality otherwise good landlords will be funding additional time and resources the council will still need to spend on poor landlords who don't want to engage.
I think there should be a lower fee where an owner-occupier is one of the permanent residents. Owners who have the space for 3 or more lodgers should not be deterred from utilising all the space available by fees or costly modifications.
It seems unreasonable to charge a fee similar to that for larger HMOs. Another council e.g. Swindon charges less. Discounts could be given for currently accredited properties and for prompt compliance.
Landlords, who cooperate, make their properties available for inspection, provide all the relevant documentation so that the inspection can be done swiftly, have compliant properties, do not require re-inspection etc. should be offered a discount. The proposed charge of £750 for a 5 bed HMO must assume a couple of days or more work for each license. This is far higher than it would take with a cooperative landlord. More info via separate email.
No, I don't think that you should offer discounts of any description. Residents do not get a discount on their Council Tax for any reason, so why should landlords. They are getting a lot of income from just one property, for doing very little and many own more than one property. They should do what you require them to do without any incentive.
How was the starting fee of £675 over 5 years arrived at!?!? £11.25 per month is a pittance to pay by landlords. This sum should be higher to cover all that BANES will be doing to improve HMOs, e.g. licence, training inspector etc.

Discounts yes on HMOs in their existing form. Likewise with accreditation certificates which could be issued for 5 years to coincide with electrical certificate.
Yes, but it should each year.
No discount. The fee should be for 1 year at the same amount as you say for 6 years. You will need to employ someone to check landlords adhere to laws and also cost of living costs up each year and so should the fee.
Landlords should pay the same as the local people even if they are not living there, then they would be entitled to any discounts available.
Needs to be higher to cover costs of administration (which are usually under-estimated)
See additional documents
Do you think that these proposals will have a positive or negative impact on any vulnerable groups in the community?
Please give us more detail on who you think will be positively or negatively impacted by additional licensing and why?
Tenants in accredited properties will see little change except their rents will go up to cover owner's costs.
In general the scheme will result in less rental property available and will therefore impact on those seeking rented property including many on benefits, who BANES appear to already have difficulty housing.
Tenants will be safer
.Positive for residents and council and landlords already licensed. Negative impact on landlords who do not want to invest in their properties or bring them up to standard - but that would be expected!
If they charge that much for licensing; that will cause landlords to force those costs on their tenants! Thus pushing further up the accommodation prices of Bath.
Licence fee costs will be incorporated into rents and your own evidence demonstrates that HMOs are tenanted by those on low incomes.
Because they are likely to be evicted by landlords who do not want to have the added burden & cost of the licensing. Other landlords will pass the cost of complying & the license fee on to the tenants, therefore their rents would increase
Tenants in HMO's will be seriously at risk of having their tenancy agreements terminated. As a landlord, I would certainly be forced to evict my tenants & either rent only to families, or sell the property & release my capital.
The elderly of our area will benefit from less student houses.
improve safety and conditions for tenants
Young people trying to share the burden of high tax from council and government
Students and tenants will end up paying more in rent. I don't believe that my property will be a better home. It will just cost more!
It will help ensure that we maintain a mixed community.
May be a small step to returning to the quality of life we used to enjoy in this area.
Vulnerable groups are those who need housing. The negative effect will be that more properties will be bought up, as they become empty, to provide student housing at inflated overall rents and thus deprive these vulnerable people of affordable housing.

Will significantly reduce the availability of rented accommodation and also increase the cost; particularly to the most at risk groups.
I think this can only be a good thing
Lower income families / tax credits etc. could be adversely impacted if the fee is passed on in increased rent. Arguably students would just increase their debt (student loan) and pay back over a longer period and would not perceive this as an issue.
Better standards of accommodation is better for everyone but if rents are increased then this may make it harder for very poor people to find accommodation.
As a lot of these properties will be inhabited by students, I feel they should be entitled to live in conditions that are considerably better than those they are subjected to at present.
It's going to increase rent - that is unavoidable unless the council becomes a significant landlord in the city.
Students and young professionals will be affected as rent will increase as costs are passed on. Rental property may become less available, thus pushing up rent.
It will put rents up
The licensing will not only be detrimental to students, but to other groups such as immigrants, young professionals and other who wish to live in groups.
Both students and locals.
Rents will have to increase to pay for double glazing and extractor fans.
As ever you will chase the good landlords and never get around to the bad ones. Still it creates employment and revenue.
Tenants who may be intimidated by landlords should benefit.
Students will have to pay more for their rent. There will be no benefit for anyone.
You must include Combe Down in your catchment area, which is close to university. Trinity Road will be inundated with MHOs as the houses are affordable compared to the very expensive houses in Combe Down. We will become the next Oldfield Park.
Too often poor and disadvantaged people are required to live in substandard accommodation and hopefully this would improve the quality
Does not go far enough in scope and areas. Bathwick is badly affected by student households. The owner of the house next to me rents to 5 students. He is now extending outwards and plans to build into the loft, to be able to accommodate even more.
Positive for landlord's residence but extremely limited use to vulnerable groups in the community.
Local elderly residents feel bullied and intimidated by the large numbers of noisy students the area, anything which can contain this issue will be of benefit.
It will stop landlords taking advantage of young people e.g. students, as the facilities offered will have to be of an acceptable standard.
Would help in cases where the occupants of HMOs behave antisocially,. Especially where noise is concerned.
I don't think it will have any effect on vulnerable groups.
Areas not included will be negatively impacted on as you force landlords to seek properties in areas not covered
Poor renters will be negatively impacted - in some cases significantly given the scale of the fees - as landlords will inevitably pass them on in higher rents
If the licensing is such that it works it means that both older people and younger families will both not feel, as they can do now, isolated in their local community. We can then function as a caring community, i.e. with neighbours who know and care about each other.

To bring the area back up to the standard of pre multi occupancy standard by bringing in extra controls can only be a positive effect for residents
People living in neighbouring properties, especially those who live in high density HMO areas.
Some good landlords because of extra work might decide to opt out of renting and thus impact on long term tenants
Local residents will no longer fear going out in the evening during the time the students are here. Communities will be more balanced.
It will help elderly people who are surrounded by HMO's and will hopefully improve their lives.
Only 65% of HMOs in Bath and North East Somerset are acknowledged to be student houses by council tax records. This means about 35% of housing is used by other members of the community and as such may be negatively impacted by these proposals.
Those supporting themselves but on low income - not students but the newly graduated who are needed to contribute to bath.
1. It may make landlords/potential landlords think twice about buying up what were traditional family homes and then ruining the home and area. 2. Landlords should, after paying the fees, be more inclined to maintain the property.
The tenants will be positively impacted by this additional licensing and it will help ensure that landlords provide accommodation of an acceptable standard.
Residents who live adjacent to student-occupied properties would benefit from improved environment.
The elderly will be less likely to be confronted with rubbish put out incorrectly onto pavements creating trip hazards etc. Having a reporting mechanism to express concerns over anti-social behaviour should provide comfort to those unable to tackle them directly as they arise.
Local people want less students living in the area and less noise
Effect on vulnerable neighbour's very important e.g. poorly managed property next door.
It will positively impact on tenants by ensuring the property is maintained.
Everybody! Health and safety for tenants and neighbouring house, pride in the streets. More harmony between all and better interaction between neighbours.
I think a lot of immigrants are targeted into poor quality/low rent/unregulated HMOs.
House owners bought houses previously in the residential area - clean, no undue noise, tidy streets, helpful refuse collectors - hopefully this could continue, if landlords of HMOs monitored their properties more.
Clarify who you consider vulnerable. Renters need some protection to ensure they receive fair value. The local Community has a right to a presentable and liveable neighbourhood.
A much better choice of questions: This proposal will VERY substantially reduce the availability of cheaper and more affordable housing for ALL young people, not just students, but essential workers and people pushed out of the benefit system by the recent changes.
I spend a large amount of money bringing my rental property to a high standard. Additional licensing will negatively affect by business due to licence conditions that are too black and white.
Positive - low income/special needs people who are already supported by the Council in terms of housing benefit.
Negative - students/professionals will have to pay more rent as landlords will pass on costs.
Students will be impacted negatively. Please see previous answer.
Why target all landlords - good and bad? Licensing will not deter the proliferation of HMOs unless requirements are so punitive it makes being a landlord very undesirable or uneconomical. Costs will be passed on to tenants so it will be a negative for them also.
Positive: The permanent local community; the ability of families to compete to buy for the housing stock. Negative: Potential impact on house prices.

The positive side is that if additional licensing is rolled out city-wide it will prevent any fire related accidents as previously written. Thus protecting the tenants in HMOs that do not meet the fire regulations for escape from an HMO.
Positive impact on tenants.
I should think they would have a positive effect on those renting the properties, don't think as they stand they would help the wider community at all
current landlords such as myself who already pay for current HMSO but will have further costs on other property if this legislation is passed
Positive impact- the street in which I live in has deteriorated greatly in the past 15 years, in my opinion due to the high concentrations of HMO's. There is far more anti-social behaviour than ever, my house has suffered great expense due to this.
Reduction of noise and also increased responsibility from landlords to ensure residents behave appropriately
Neighbours of HMOs will be positively impacted, tenants can vote with their feet on whether to rent/ live in poorly managed or maintained properties.
Private home owners who have 2 or more lodgers will be massively negatively impacted. It appears from reading the documentation that this group hasn't been considered at all.
Increased rental charges by passing on these charges. Why increased licensing when the present licensing can't be policed?
Immediate neighbours.
Landlords will be more accountable not before time Many landlords do not live in the local area so have no interest in how the area has been affected by the bye to let market. Properties should be inspected inside and out and there should be rules and regulations when renting out properties.
It could initially have an effect on people with lower incomes, because the initial upgrades and fees could cause landlords to raise rent significantly.
I think that any unlicensed landlord should be given notice to close.
Positive impact on neighbours of houses accommodating numerous students. The all night parties at weekends have become a nuisance, cars parked everywhere and garbage dumped anywhere in the streets/
Owner / occupiers, the aged, and young families.
Elderly home-owners who are persistently inconvenienced by excessive noise and dirt issuing from HMOs.
the students themselves
Single professionals, students, small families, nurses, tenants on benefits - basically HMO tenants of all walks of life will inevitably be impacted by the level of license fee imposed.
The occupants of HMO,s are vulnerable to the Rachman type landlords. They need to have a set of rules to allow them to blend into the local community. At present they answer to no one.
It is going to increase their rents. A tiny minority of landlords have poor accommodation but thousands of tenants are going to be made to suffer. Better to promote a vibrant rental market than increase the costs and hassle of letting.
I only let to Bath students I do not come into contact with anyone else.
At the moment HMOs are not always up to a decent standard, in a health and safety way, I think that by bringing in a strict licencing system people will be protected from unscrupulous landlords.
It may well reduce the stock of available housing to let. Landlords will be much more careful about taking tenants.

Some good Landlords will sell up, ones who are fed up with the latest tranche of what they see as money making tasks by BANES. . This could create a shortfall in good rented accommodation and the rents will go up as a result. Some of the lesser Landlords might [pay the fee and put rents up asap.
1 People who need accommodation because the supply is likely to be reduced and the cost increased. 2.If the landlord is going to be held responsible for the tenants behaviour, it would be unwise to let to other than middle age plus tenants
If they improve safety and comfort surely the impact must be positive for all unless the landlords put up rent to cover the license
Will ensure that fire regulations and standards of cleanliness are enforced.
The students will be negatively impacted .It is my desire to keep rents as low as possible but WE WILL add these charges on and tell the student we are doing this...so they know why rents are higher
Poor HMOs brought up to standard through licensing = good Students in responsible HMOs disgruntled by having to pay extra every week/month = very bad
Vulnerable individuals often have access to additional local authority support. Deficiencies in housing standards should be reported and dealt with through this avenue.
Tenants rents will rise
There is already the 2004 Housing Act. The LACORS fire recommendations run to 84 pages of regulations. Landlords will be intimidated and not want to become involved. There will be a restriction on further licences all of which will limit supply increase HMO property values and push up rents.
Residents will benefit from Additional Licensing, hopefully reducing the no of HMO's in the area
It appears that social services/local government has opted out of this aspect and left it up to landlords. Hardly an endorsement of a caring local government!
Additional licensing will have no benefit to students and young professionals, as it will bring no significant improvement to the standard of housing while complicating matters for landlords. I previously lived in a licensed HMO which was in worse condition than my current house (an unlicensed HMO).
Positively. Me, because I deserve it!
I think the residents will benefit from additional licensing, hopefully reducing the number of HMO's in the area
If implemented these proposals will improve the quality of housing and the management requirements for the property giving a positive benefit to the occupiers.
Additional licensing won't alleviate the problems that the residents of Oldfield Park are complaining about.
Owner-occupiers may be deterred some from caring for the vulnerable outside the formal fostering arrangements. A disabled householder with live-in carers could fall into the HMO category if there are more than two carers.
It could have a negative impact if good landlords decide to sell up. Fewer properties make it harder for vulnerable people to find homes. Homes that are licensed may improve.
I am not sure who these vulnerable groups are, but I am sure this will have a very positive impact on the affected communities and their residents, by making the areas a more attractive and pleasant place to live and enable young families and first time buyers to move into these areas.
Positive - improvement for local community especially gardens, noise and maybe if licence increased there would be fewer HMOs (especially student) if landlords not able to comply.
Landlords will be positively impacted as with a limited supply of proposed HMOs prices will rise creating a two tier market. The impact on highly populated student areas will not change unless there is some enforcement.

<p>The only people making anything out of the changes is the Council. Doubt if anything will be passed onto local people.</p>
<p>Tenants will have more protection. Most landlords do not live in area. Companies look to profit only.</p>
<p>See additional documents</p>
<p>Other comments.</p> <p>Would you like to make further comments on additional licensing?</p>
<p>I have all properties accredited and can't see why I would continue with that scheme if they have to be licensed HMOs too. There is a great overlap and the accreditation scheme works well and is simple to administer.</p>
<p>██████████ on whose behalf I submit these comments, supports any action which has the potential to improve the physical amenity and appearance of the areas within the World Heritage Site and it is on these grounds we submit these comments although we are also aware from our members of the several social issues relating to HMOs.</p> <p>Monitoring and enforcement must be critical in ensuring this programme works as well as publicising successfully prosecuted cases.</p> <p>Collaboration with e.g. residents associations and neighbourhood watch teams might extend monitoring resource.</p>
<p>How can the additional licensing ensure that the fabric of the rented properties are well maintained externally (painted etc.) and the appearance is more like those of the local residents. Also how can the licensing ensure gardens are kept to a certain standard? These are necessary to overcome many residents' complaints.</p>
<p>If they charge that much for licensing that will cause landlords to force those costs on their tenants! Thus pushing further up the accommodation prices of Bath. I'm a landlord and there is no way I can afford those charges, so if that happens those charges will be going straight to my tenants - is that really what the council wants!?</p> <p>Landlords really aren't making the profit the council thinks they are! I know, I'm doing it - just enough to cover expenses - we are no cash cows.</p> <p>If landlords had not bought the cheap properties in the run down areas of Bath, such as Oldfield Park, the area would continue to be a slum as it once was - keep pushing us with more and more restrictions and you will find that the landlords leave the area and you are left with a property crash on your hands.</p> <p>Student Landlords are one of the many vital aspects to the local economy in Bath - why don't you try to work with them and support them, along with the students.</p>

<p>I have grave concerns regarding the impact on rental costs. The higher standards will involve a financial investment on the part of the Landlord, and the properties you aim to improve are likely to be managed by the type of Landlord who is looking to optimise financial reward with as little investment as possible. In these cases, they will pass these costs onto the tenants - not just the license itself, but also improvements to services & facilities, some of which may financially benefit the tenant but may not outweigh the increased rent incurred to pay for them.</p> <p>This proposal will result in greater financial pressures for tenants who are likely to be on low incomes. It will disproportionately affect those age 18-30, who are already facing difficult economic circumstances with little hope for their future & although I support the aims, I do not think the reality will benefit the residents and local area in the way you predict.</p>
<p>How can the council justify this additional licensing and the excessive costs?</p>
<p>See my previous statements</p>
<p>I do not think that my tenants would appreciate the council's albeit good intentions, if it resulted in their being given notice on their tenancy & they found themselves having to look for alternative accommodation.</p>
<p>Please just stop greedy landlords buying up properties in our area. 2 beds into a 6 bed house is no joke. We have lost our community, no families left in the area, just the elderly and students.</p>
<p>Yes but no point if no one listening</p>
<p>This will not resolve the problem of housing non home-owners who need housing in these areas. It will not discourage HMOs. As renting to students is profitable anyway, the extra cost of licensing etc. will not deter landlords letting exclusively to students or cramming as many students as they can into their houses. In my street there is no problem with students, their safety or behaviour. However, there is a problem, in this area as a whole, of lack of available accommodation to non-students.</p>
<p>The consultation does appear to be largely drafted on the presumption that a decision has been taken to implement such measures and only the details can be amended - this is concerning and does suggest an element of prejudgement. Whilst it would be beneficial to improve a number of properties that are rented to students, these current proposals will undoubtedly have the effect of increasing rents and reducing the number of properties. As the area has a significant homeless problem reducing the number of properties available in the rental market does not appear sensible. Full implementation of the proposals could also reduce the market value of properties in the designated areas and this will clearly impact on owner occupiers as well as landlords.</p>
<p>I am fully in favour of people bettering themselves by becoming landlords. But there needs to be control. And ultimately a lot of people have become very wealthy through owning HMO's. They should be made accountable for their property. I don't expect the students in the HMO's to tend the gardens, but the landlords should regularly check on their property. I live next to an HMO in Southdown, and while we get very little trouble from the students, the exterior of the property is a mess. And in three and a half years of living there, I have never once seen the landlord. Nor do I have any way of contacting him.</p>
<p>It does seem unacceptable that whole streets can be given over to HMO rented accommodation. Licencing in some of the city could drive student landlords into other areas - this should be considered. Why not make it a city wide thing - or just restrict via planning applications - low cost to the licence but restriction on density (which is the real cost to the neighbourhood).</p>

<p>The opportunity to build up a significant housing stock will come up when the majority of current landlords are judged unsuitable by the conditions I've just read. The council could have a long term revenue stream and have the capability to protect the needy.</p> <p>From a student perspective, I just about get by financially but I really struggle and will have a scary amount of debt when I graduate. When I think of how I could have lived in another city I think it is likely that if rents go up much more, students with my background won't be able to study here. I worry when a faceless council threatens to make it unaffordable without communicating properly. The only reason I knew about this was because I was following the Article 4 mess, which less face it was a bit of a fail for democracy. I'm a student and I would have supported it, we all know the uni needs to stop growing, but the city relies on it so much, we students are the cash cows for everyone else.</p>
<p>This scheme seems to be duplicating the accreditation scheme values, which is free to landlords and gives tenants the security of knowing they are with a responsible landlord. Some landlords will comply but it will not force them to give on-going care to their property or tenants as 5 years is a long time. The bad landlords will still exist. Young people need to be encouraged to come to the university to study and with high tuition fees their budgets are already stretched.</p>
<p>Licensing targets the wrong landlords. You should dig out the dodgy ones. You don't need a paperwork based system to do that.</p>
<p>This is half continued from the question above and also a general comment.</p> <p>The council is looking to increase graduate retention (one of the things which has recently come about) and by introducing HMO's this will not happen; students who are affected by HMO's will not feel part of the community and will therefore not want to stay in the area.</p>
<p>I am very concerned about the impact on the local community from these properties. I have heard some horror stories and every 3 years worry when there is a new influx of students next door. I feel I have very little, if any recourse, other than appealing to the students, or if this fails, as it has on one occasion, the landlord. The law does not protect people like myself from noisy neighbours who can destroy your peace of mind. Most landlords do not live in the area of their properties and therefore do not have to put up with any problems.</p>
<p>You state that the majority of houses were well managed. I do not accept you have shown sufficient evidence to impose extra controls. You do not say what percentage of HMO's are already voluntary accredited. If there is already a good percentage it will be even harder to impose extra controls.. You are proposing to bring in controls for safety and nuisance reasons but extending conditions relating to energy efficiency has nothing to do with this. The EPC reports are written as recommendations and were never written to be mandatory. My own CP certificate recommends a condensing boiler, solar water heating, double glazing, and internal and external wall insulation. ALL of which I would be required to do within one year to bring my property up to level c. My property is currently accredited with 2 stars a similar system could be used.</p>
<p>Give benefits and discounts to landlords that are professional and comply.</p>
<p>Just look at the recent report by Shelter:- "http://www.bbc.co.uk/news/uk-19818584"</p>
<p>I am totally opposed to this bureaucratic tax. BANES already has a well-run accreditation scheme, which is perfectly adequate and helpful for landlords while being beneficial for students; stick with that.</p>
<p>I live in Trinity Road Combe Down and opposite me are ten houses, five of which are HMOs - three bedroom houses converted to four/five bed student lets. That is not including the houses on my side - out of ten, three are let to students. So out of 20 houses, nearly 50% let to students! THAT IS MORE THAN ENOUGH FOR A SMALL ESTATE TO HAVE TO PUT UP WITH. Also further down the cul de sac are more HMOs. If you count the whole number of residences it may seem a low number, but take out the</p>

<p>sheltered housing, of which there is plenty which can never be exploited by greedy landlords, the number is high. Why should we have to put up with students who care little about their surroundings, recycling and litter left to blow around in the wind and generally contribute nothing to the community? This area MUST be included in your consultation in terms of HMOs and also if there is to be a percentage in terms of how many multiple lets can be in any given area.</p>
<p>All costs related to problems caused by residents should be levelled at landlords not the tax payers.</p>
<p>Additional licensing is a very positive step and I congratulate the council for having made the decision to proceed. Please set this system up as soon as possible.</p>
<p>Where new HMOs are proposed, the developer should be made to include parking in the scheme. Parking in the area is extremely difficult as it is. A parking place should be providing on the proposed site to match the proposed number of occupants.</p>
<p>As I said above, the biggest issue right here is student houses. Surely the quality and safety of these is just as important, especially given the large number of student houses on the Lower Bristol Road?</p>
<p>I have a particular concern regarding this subject and how it falls in line with the government's change in planning applications for residential dwellings - the one where planning application no longer needs to be sought for residential home extensions. How will the council manage houses being turned into HMO's when this comes into play?</p> <p>Whilst the proposals for regulating HMO's in terms of their upkeep is admirable (unless I've missed something), you don't seem to be addressing the issue of how many there are and how they impact the local areas that are being overrun with them.</p> <p>Also -this strikes me as an IPSOS MORRI survey? The questions and available answers don't appear to ask anything clearly or answer anything useful in terms of actual opinion - typically useless and overpriced advice from a company that know nothing about the subject they are creating the survey about.</p>
<p>I let a property in Oldfield Park, over the years I have added insulation, double glazing, fire alarms, and paid for garden maintenance. In return my latest tenants left the house damp and filthy then refused to contribute to the cleaning costs. Landlords have an agreement with tenants, but how they behave in our properties isn't in our control.</p> <p>Noise, housing appearance, rubbish and local shops changing are the main issues I could pick out of the consultation. Noise and rubbish could certainly be addressed by a local reporting initiative linked to the police (in Nottingham there is a fine system).</p> <p>I have no problem with the council trying to improve standards of HMO's. What I resent is my main source of income being reduced so that the council can enforce changes to other HMO's that I have voluntarily done to my property. The burden should not just be on landlords when half of the issues are to do with how tenants use (abuse) the properties.</p>
<p>You need to include Trinity Road, Combe Down as there are many HMO's there. Once you remove the sheltered housing from your equation there is a high proportion of student houses numbered among those that would be available to be purchased and subsequently let as HMOs. In the first part of Trinity Road alone there are 20 houses, 8 of which are let to two students. I personally cannot accurately comment on further into the estate as I am unsure of the numbers and so decline to do so.</p> <p>8 out of 20 houses cannot be acceptable-it is ruining the community and the estate-and that is only the homes I am aware of!</p>
<p>There are more important issues for the council to attend to e.g. traffic gridlock.</p>
<p>I hope you will be able to limit the number of HMO in each road in an area.</p>
<p>Have already sent letter to Jeremy Manners</p>

<p>It appears to me that the arguments for requiring HMO licences for all let houses is based on</p> <ol style="list-style-type: none"> 1.) fire hazards, 2.) Standards of accommodation, 3.) state of gardens and 4.) Waste management. I fail to see how the HMO licencing process will effectively address points 2, 3 & 4. As landlords, we will have to pay a lot of money for the licence. Then once a 5 year licence is granted, what will be done to insure accommodation standards and gardens are maintained? As for waste management, how on earth will the process drive waste management practices with the tenants? I let two properties to groups of students. Whilst staying in Bath and working on the properties I witnessed first-hand the problems you face with the collection of waste from residents. It is NOT just an HMO matter. The mess on the streets after rubbish has been collected is caused by vermin, mixed with the reluctance of the waste disposal workers to pick up single items not in bin bags.
<ol style="list-style-type: none"> 1. Should impose huge extra cost if the HMOs have car/s. Oldfield Park is nothing more than a huge car park. Landlords, if it is found that students have car/s, should be forced to make this extra payment. 2. Fines/extra charges for lack of maintenance. 3. Fines/extra charges for noise and nuisance. <p>Give Oldfield park back to the residents. Sell houses to young professionals/families. The housing stock in Oldfield park is too beautiful to be given to greedy landlords.</p>
<p>Enforced energy efficiency is a threat to the historic fabric of the city. Too many Victorian houses are losing their sash windows to uPVC double glazing, when the long-term environmental impact of plastic is far more reaching than running the heating up a bit high. Do not include energy efficiency in this Miss-guided landlords' licence scheme.</p>
<p>The sooner the better. Should have happened years ago!</p>
<p>Students living next door create noise nuisance</p>
<p>It would be useful if the Council insists that the landlord provides appropriate bins and instructions for tenants about recycling (particularly important for students who are living away from home for the first time).</p>
<p>The positive effect of additional licensing should be a necessity for all HMOs and therefore a far more proactive scheme should/needs to be carried out to ensure HMOs are known and are not under the radar as I keep hearing.</p>
<p>I hope it will help to stop roof conversions which are disproportionate to the size of the property. An anonymous letter in the Bath Chronicle this week says we are just pushing the problem elsewhere - we want the rest of Bath to take on a fair share of the HMOs!</p>
<p>All interested parties need to work together on this issue to ensure the outcomes are fair to all constituents and the changes proposed are for the right reasons which is to bring about genuine improvements and consistency in the program.</p>
<p>The standard of this consultation questionnaire is really appalling! It is not possible to give sensible responses, nor, therefore, to arrive at reliable conclusions from it. The issues are far more complex than the questions imply.</p> <p>However, the main problem with this proposal is that it is totally unnecessary.</p> <p>That it is based upon the public concerns about the diabolical refuse collection system.</p> <p>And that EPC Grade C is totally unachievable for Victorian buildings - at any cost. Have you done your homework on this??</p>
<p>The area should be widened to include much more of Bath. Otherwise it seems likely that other areas will be targeted for HMOs (and that, in due course, new university bus routes will be set up to cover those areas.</p>

<p>I feel that instead of rewarding good landlords/agents who are maintaining their properties and managing their tenants appropriately, we are all being punished for the mismanagement of a few. This may create resentment amongst landlords. Can you not think of a way of rewarding people who have worked hard over the years and maintained good standards, instead of punishing us all? This licensing scheme will discourage landlords from renting to students - surely this is not the Council's intention. Many of us were students at one time of our lives and to take away what is an essential university experience, living together as ONE family in a family home, will be a huge loss to future generations. It does not seem the right thing to do.</p>
<p>Include Trinity Road.</p>
<p>You need to tell landlords what it is you are trying to achieve. Seek co-operation instead of alienating them all - even the very responsible ones. Be prepared to take action against tenants whose behaviour often creates the issues you think licensing will cure. Use the Planning Department to curtail the number of residential conversions and the Environmental Health Department to address other issues. Use what powers you already have instead of creating new problems for yourselves, landlords and letting agents.</p>
<p>Clearly landlords will object; however many are absent for the majority of the year also don't understand/care about the impact on the community. Houses are left untouched for the majority of the year; for example gardens are neglected and only tidied at the end of the contract year when deposits are due. There is a need for a balanced community; some recent comments in the press state that licensing is not the answer but offer no alternative solutions. The universities could/should do more to provide their own accommodation.</p>
<p>I am concerned that the minimum room size is too big and smaller terraced house will fall outside the limit. This will reduce the housing stock - increase competition for rooms and rents will go up. Many people have been brought up in small bedrooms and many are bedrooms are shared. Account needs to be taken of shared accommodation - I.e. the communal area should be shared between the tenants and added to the bedroom area. This will benefit those landlords who have provided adequate communal space and penalise those landlords who cram too many students into houses.</p>
<p>Landlords should supply neighbouring properties of their HMOs with a copy of the conditions of tenancy so neighbours know when tenants are breaking their tenancy agreement and the numbers that are supposed to live there, as I have counted as many as 11 coming out a 5 bed HMO in the morning.</p>
<p>Must be strictly enforced.</p>
<p>I do have further comments, however I am unable to condense into 1000 words, so I shall email to hmo_licensing@bathnes.gov.uk.</p>
<p>Keep paperwork and inconvenience to a minimum. I already spent hours of my life compiling pointless paperwork for government agencies in other areas of my business.</p>
<p>As stated, this proposal is ill thought through and needs to be reconsidered: Under the current proposal, my property would become a HMO. I am a home owner who has up to two lodgers living with me. According to the current proposal I would need to:</p> <ol style="list-style-type: none"> 1. Pay a license fee of over £600 a year 2. Attend a training course on how to manage a HMO 3. Additionally comply with an array of other time-consuming and costly conditions, despite the fact it's my private residence and I just happen to take in a few lodgers.

<p>Additionally I would like to comment that the questionnaire is appalling from a methodology point of view, as it's transparently designed with the intention of encouraging 'positive' headlines rather than genuinely canvassing opinion.</p>
<p>I think that where any HMO that has a rear access to a parking place or garage, the landlord should make the space available to be used for the purpose of parking a vehicle of an occupant of the house, not for storage of building materials[I may be wrong, but does that not require CHANGE OF USE PERMISSION]</p>
<p>In my own opinion it is ridiculous to add additional licensing when the council can control property at the moment under the existing licensing. We already have existing laws regarding waste in our streets [litter] Rubbish in our gardens [health] Noise etc. why do we need more regulations when we already have them? This is basically the council needing to be seen to be doing something, when it is failing to do what can already be done. I strongly believe most landlords provide good housing initially. It's for the most part the tenants [students] which make the noise, litter the streets with filth and destroy property. The council should use their existing power to tackle this at source, and not penalise the landlord who in the most part is providing a good service to the tenant and city.</p>
<p>It would be nice if a BANES officer visited the local area to inspect the area and spoke to local residents to improve area. I know it is not possible to turn back the clock but our local area Oldfield park has been affected by the fact of the bye to let market. Just walk around the Oldfield Park area to see for yourself the way the area has been changed. Many properties have been purchased for profit with little or no consideration on the local residents.</p>
<p>I think this is a fantastic idea, as I am currently living under a terrible landlord. We have gone weeks without hot water, months with faulty electrics, the lighting & fixtures all require little bulbs that eat a lot of energy and break all the time & general care and maintenance is neglected. I would like to see landlords like this sorted out.</p>
<p>These proposals are many years too late!! if implemented may stop a further influx of students, therefore improving the parking chaos, and returning Moorland Road to a better variety of shops rather than fast food outlets and letting agents.</p>
<p>This whole initiative to extend the licensing is driven by people having sold their homes to landlords leaving residents to live next door to a house which has numerous students. Landlords are being made to shoulder additional controls because of political pressure from local residents. The problems of noise disturbance is already covered by legislation and is not restricted to student accommodation. It is very hard for landlords to evict a tenant when the courts see this as a minor offence and do not wish to make someone homeless which is the reason why the landlord's hands are tied most notably in the first six months of an Assured Shorthold Tenancy.</p>
<p>HMO do need additional regulation due to the potential for negative impact on a district. Problems with waste, noise and fire safety are important to those of us who have HMO nearby. There is also the impact on the housing market to consider. Many young families are unable to buy locally, and have to rent, possibly paying more than a mortgage would cost.</p>
<p>The licensing area should cover the whole city as it is beneficial to all residents of HMOs. If the restricted area is to be used, the new development (Rennie Close) at the end of Lime Grove Gardens should also be included.</p>

<p>The premise is that we have 'Licensing' or keep the 'Status quo' (which is a nonstarter) all other options of which there are many are not offered here? Instead of devising a system where I'd be pleased to give of my time to make work, yet again you will impose some impractical set of values on both Landlords and tenants (by default) as has been the case over the decades. Please, please listen to those who already work the system. ...and now I find you can't even let me know how many words I can write in this section until I finished writing, after I have written approx. 5000 characters. Bearing in mind the reams of information we have had to read about this and then you graciously allow me 1000 characters in the only section I have free reign.</p> <p>Will you really manage the complexities of licensing? Nb. Little of what I wanted to say is in the above!</p>
<p>Landlords would be more honest and come forward to join the HMO scheme if the costs were not so high.</p>
<p>I can only think that introducing this at the same time as HMO planning permission is confusing as people are inclined to conflate the two.</p>
<p>Possible to make landlords records available to potential tenants so they can identify good landlords?</p>
<p>I think there should be transparency for all who are seeking/ living in a HMO, and also for neighbours of HMO, we also should have access to this information.</p>
<p>Not all landlords are bad, not all landlords are good. Tarring the good with the brush of the bad is definitely a destructive idea.</p> <p>Good landlords will support the scheme if sensitively and sensibly administered. BANES need good landlords to be onside. A few landlord forums goes a long way in maintaining good will on both sides and is the place where like minds can meet.</p>
<p>The private rental sector is already heavily regulated with effective safety measures well established. Assured Shorthold Tenancies give acceptable security to both landlords and tenants and the system works well in providing housing for the rental market. Further intrusion, regulation and cost imposed by the state and local authorities without additional support to landlords will act as a further disincentive to those seeking to invest in the sector. When adequate powers already exist to enable councils to target poorly managed housing the scheme looks very much like a revenue generating device.</p>
<p>Additional licensing is not necessary.</p>
<p>THIS IS A JOB FOR THE BOYS!</p> <p>This is the product of Quango's designed to provide employment for the public sector. How can you go on and on more and more regulation, inspections, enforcements and prosecutions? All at a time when the public sector spending must be cut back. I see your answer to this is to change a fee which will in fact be paid by nurses, students, single families as these regulations strangle supply.</p>
<p>None</p>
<p>I am used to evidence led decision making. I see no sign of it in this woolly document. Most of the conclusions appear to come from the worst aspects of a Brussels dictate. The figures quoted on numbers of HMO's tend to show a sledge hammer to crack a nut.</p>

<p>asks for Bear Flat to be added to the licensing area.</p> <p>The proposed licensing area includes Moorlands and The Oval to the west of Bear Flat and Perrymead and Prior Park to the east. The omission of Bear Flat looks anomalous. We urge you to connect the two peninsulas shown on the proposed licensing area from just south of Englishcombe Lane (where one peninsula abruptly stops) across Entry Hill to Honeysuckle Farm off Perrymead (to join the other peninsula). This would make for an even southern boundary to the licensing area with a consistent radius from the City centre.</p> <p>Not only is Bear Flat as vulnerable to an excess of HMO as adjacent areas but there could be a knock-on effect if it was omitted. When planning is tighter in areas such as Oldfield Park then investors/landlords may turn to areas like Bear Flat where it will be easier to win consent.</p>
<p>Introduce business rates on HMO's. Introduce council tax on HMO's. Council tax banding should be reduced for local residents because of the inconvenience caused in Westmoreland and Oldfield Park ward by HMO's. The council should address the root of the problem - too many student houses - and lobby central government to make a special case for Bath, as a World Heritage City, and both universities intake. We can no longer accept such saturation.</p>
<p>The council needs to introduce business rated or council tax, on HMO's.</p> <p>The banding for the council tax should be reduced by at least a band for local residents, because of the inconvenience caused in Westmoreland & Oldfield Park wards by HMO's.</p> <p>The council should cap both universities to the no of students it can have in the Halls of Residents. The above wards are at saturation point.</p>
<p>The density of student housing in the proposed areas of control has gone beyond that which is acceptable, and a realistic cap must be applied to the number of student HMO's in any road. The percentage of HMO's to single occupation properties is far too high in the present draft scheme and must be reduced to 10% maximum.</p> <p>HMO's are a business and the personal, 24 hour availability, contact details of the landlord must be clearly displayed at the front entrance to the property.</p> <p>The establishment of a database via the internet containing contact details. Failure to reasonably respond to a genuine complaint quickly should result in the loss of the licence.</p> <p>Those employed by the council to ensure effective running of the scheme to be contracted to work at night and at weekends when the problems are occurring.</p>
<p>No</p>
<p>Home energy performance: I very much support the principle, however I can concerned that to raise most of the housing stock to a C would entail excessive cost. I would therefore prefer path asked approach. Most properties should reasonably & easily make a D and this requirement would improve many properties. I would see C as aspirational as I am not convinced that the cost/ benefit stacks up at this time.</p>
<p>I will send a separate document setting out further comments</p>

<p>Control the summer maintenance of HMOs so that there is no plethora of workmen's vans or skips for weeks as properties are refurbished for the next intake. Check that before a licence is issued any structural modifications to the property either had permitted development rights or has a valid planning permission. Licences should be refused for any property failing this test.</p> <p>With the current application for purpose-built student accommodation at the former Carr's Mill site, there will be a demand for HMOs in Twerton when students want to be close to their friends but not in purpose-built accommodation, so the map should be extended westwards to include all of the Twerton High Street environs.</p> <p>There must be phone numbers covering the whole 25 hour day placed so that they can be read by neighbours who have no access into the building, so that problems such as leaks or alarms sounding when the building is unoccupied can be reported.</p>
<p>The council is not sure how many HMOs there actually are and a survey response of 7% is very low to base arguments on. The council already has powers to combat noise, antisocial behaviour, rubbish left out on the wrong day and parking problems. They also have powers to inspect properties and tackle safety inside the houses through HHSRS. Tenants are ultimately responsible for the noise they make, how they present their rubbish and (if in the tenancy agreement) caring for the garden. Tenants can be evicted if they do not adhere to the tenancy agreement but the landlord needs to go to court with sound evidence, which may take months. Accredited landlords will be targeted first and have to pay for the scheme while other less reputable landlords slip under the radar for months if not years. I am not convinced that additional licensing will be successful in sorting out the problems reported by other local residents.</p>
<p>Please see our email with further comments. This is the view of [REDACTED], private landlords, so represents two people. We did not want to spend the time filling this out twice and making you read it twice! Good luck with the consultation.</p>
<p>No, I think I have made it quite clear that I am in total agreement with this additional licensing and the quicker it can be implemented the better.</p>
<ol style="list-style-type: none"> 1. Properties should be inspected on a minimum twice yearly cycle. 2. Conditions should apply to the number of rooms available in the HMO rather than the number of people renting at any one time. 3. How would overcrowding/over occupancy be dealt with?
<p>Extension of HMO licensing - No. Mandatory accreditation - Yes. Purpose-built student accommodation for first year students - Yes. Accommodation for the following years - ask the students what they want.</p>
<p>The scheme should be adhered to as it is by local residents. No new licensing scheme needed. Too expensive!</p>
<p>Business rates to be paid. Some students sub-let.</p>
<p>See additional documents</p>

Annex IX
Written and other responses attached separately

Annex X Letter promoting the consultation (1 page)

**Bath & North East
Somerset Council**

Working together for health & wellbeing

NHS
**Bath and
North East Somerset**

November 2012

Direct line: (01225) 396444
Fax: (01225) 477839
Email: hmo_licensing@bathnes.gov.uk

Bath and North East Somerset Council Online Consultations

Additional Licensing - Houses in Multiple Occupation (HMOs)

You've been invited to participate in the **Additional Licensing - Houses in Multiple Occupation** consultation.

The Council is considering extending its current licensing scheme to require all shared houses to be licensed around the Wards of Oldfield, Westmoreland and Widcombe as well as small parts of adjoining Wards including Bathwick, Twerton, Lyncombe and Southdown. A shared house is where a group of unrelated people rent their home and share a bathroom or kitchen.

Additional licensing would allow the Council to ensure that shared houses meet minimum standards to protect the occupants' safety and health. It would also help improve management of these properties which is beneficial not only for the occupants of shared houses but also for the wider community and, provide consistent standards for landlords.

The consultation seeks your views on whether additional licensing should proceed and if so, what should be included and how it could work. The consultation will run until the **30th November 2012** and we welcome and encourage your views and comments.

To have your say, please view and respond to the consultation online

www.bathnes.gov.uk/hmos

Your comments will help us shape how we deliver our services to you.

Yours faithfully

Housing Services

**Making Bath and North East Somerset an even better
place to live, work and visit**

Annex XI
HMO occupants' questionnaire (3 pages)

<p>1. Address (House number and road)</p> <p><input type="text"/></p> <p><input type="text"/></p>
<p>2. Ward</p> <p><input type="radio"/> Oldfield</p> <p><input type="radio"/> Westmoreland</p> <p><input type="radio"/> Widcombe</p> <p><input type="radio"/> Other (please say)</p>
<p>Smoke alarms</p>
<p>3. Do you have working smoke alarm(s) in your home?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>
<p>4. If YES, are the smoke alarms mains wired or just battery powered?</p> <p><input type="checkbox"/> Mains wired</p> <p><input type="checkbox"/> Battery</p> <p><input type="checkbox"/> Don't know</p>
<p>5. Did your landlord or agent advise you to check your smoke alarms weekly?</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p> <p><input type="radio"/> Don't know</p> <p><input type="radio"/> n/a</p>

6. Did your landlord or agent show you how to check your smoke alarms?

- Yes
- No
- Don't know
- n/a

About your garden and outside space

7. Were you provided with the equipment to maintain your garden e.g. lawn mower etc.

- Yes
- No
- n/a

8. OR - does your landlord agent maintain your garden/yard?

- Yes
- No
- n/a

When you moved in, were you given the following information?

9. Told about refuse and recycling collection days

- Yes
- No
- Don't know

10. Given enough recycling and rubbish containers?

- Yes
- No
- Don't know

11. Given a copy of the EPC (energy performance certificate)

- Yes
- No
- Don't know

12. Given a copy of the gas safety certificate

- Yes
- No
- Don't know
- n/a

13. Do you know who to contact if your home needs a repair e.g. smoke alarm not working

- Yes
- No
- Don't know

14. Have you been provided with 24 hour contact details for your landlord or agent

- Yes
- No
- Don't know

Satisfaction

15. Overall, how satisfied are you with your home?


- Very satisfied
- Fairly satisfied
- Neither satisfied or dissatisfied
- Fairly dissatisfied
- Very dissatisfied
- Don't know

16. Overall, how satisfied are you with the management of your home? E.g. if you have any problems with repairs, are they sorted out quickly? Can you get hold of your landlord/agent when you need to?


- Very satisfied
- Fairly satisfied
- Neither satisfied or dissatisfied
- Fairly dissatisfied
- Very dissatisfied
- Don't know

Other information

Annex XII
Information to businesses (4 pages)



**Bath & North East
Somerset Council**



**Bath and
North East Somerset**

Working together for health & wellbeing

November 2012Direct line: (01225) 396444
Fax: (01225) 477839

Bath and North East Somerset Council Online Consultations

Additional Licensing - Houses in Multiple Occupation (HMOs)

You've been invited to participate in the **Additional Licensing - Houses in Multiple Occupation** consultation.

The Council is considering extending its current licensing scheme to require all shared houses to be licensed around the Wards of Oldfield, Westmoreland and Widcombe as well as small parts of adjoining Wards including Bathwick, Twerton, Lyncombe and Southdown.

A shared house is where a group of unrelated people rent their home and share a bathroom or kitchen. This includes where accommodation comes with the job even though no rent may be paid. It also includes flats above shops.

Additional licensing would allow the Council to ensure that shared houses meet minimum standards to protect the occupants' safety and health. It would also help improve management of these properties which is beneficial not only for the occupants of shared houses but also for the wider community and, provide consistent standards for landlords.

The consultation seeks your views on whether additional licensing should proceed and if so, what should be included and how it could work. The consultation will run until the 30th November 2012 and we welcome and encourage your views and comments.

To have your say, please view and respond to the consultation online

www.bathnes.gov.uk/hmos

or email hmo_licensing@bathnes.gov.uk

Your comments will help us shape how we deliver our services to you.

Yours faithfully, Housing Services

**Making Bath and North East Somerset an even better
place to live, work and visit**

The enclosed documents are important and can have legal implications. It is important that you fully understand the information provided. If you have difficulty reading or understanding English, please contact the case officer who can arrange to get the document translated.

隨附的文件非常重要，並會產生法律影響。全面理解所提供的信息對於您非常重要。如果您閱讀或理解英文有困難，請聯絡負責案件的官員，為您安排文件的翻譯。

Załączone dokumenty są ważne i mogą mieć konsekwencje prawne. Istotne jest, aby Państwo w pełni zrozumieli zawarte informacje. Jeśli mają Państwo problemy w czytaniu albo w zrozumieniu języka angielskiego, proszę o kontakt z urzędnikiem zajmującym się sprawą, w celu uzyskania tłumaczenia tego dokumentu.

إن الوثائق المرفقة مهمة وقد يكون لها عواقب قانونية. إنه من المهم بأن تفهم المعلومات الموفرة لك بالكامل. وإذا كنت تجد صعوبة في قراءة أو فهم اللغة الإنجليزية، يرجى الاتصال بالموظف المسؤول عن القضية الذي يمكن له بأن يقوم بترتيب ترجمة الوثيقة لك.

संलग्न दस्तावेज महत्वपूर्ण हैं और इनके वैधानिक निहितार्थ हो सकते हैं। यह जरूरी है कि आप दी की गई जानकारी को अच्छी तरह समझ लें। यदि आपको अंग्रेजी पढ़ने या समझने में कठिनाई हो, तो कृपया केस ऑफिसर से संपर्क करें जो दस्तावेज का अनुवाद कराने की व्यवस्था कर सकते हैं।

সংযোজিত দলিলপত্র বা ডকুমেন্টস হলো গুরুত্বপূর্ণ এবং এগুলোতে আইনগত বিঘ্ন সঞ্চিত রয়েছে। আপনি যে সরবরাহকৃত তথ্য পুরোপুরি বুঝতে পারছেন সেটা অত্যন্ত গুরুত্বপূর্ণ। ইংরেজি ভাষা পড়তে অথবা বুঝতে যদি আপনার কোন সমস্যা থাকে তাহলে কেইন অফিসারকে অনুগ্রহ করে যোগাযোগ করান তিনি ডকুমেন্ট অনুবাদ করে দেওয়ার ব্যবস্থা গ্রহণ করতে পারেন।

This information can be made available in a range of languages, large print, Braille, on tape, electronic and accessible formats. Please contact Housing Services on 01225 396444 or email: hmo_licensing@bathnes.gov.uk

Public Consultation

Short guide to proposals for additional licensing of Houses in Multiple Occupation (HMOs)

What are the Council doing?

Bath and North East Somerset Council are investigating the introduction of an additional licensing scheme for Houses in Multiple Occupation (HMOs) centred around the Wards of Oldfield, Westmoreland and Widcombe. The consultation seeks views on proposals to implement a scheme which could operate for up to 5 years initially.

Why are the Council proposing this scheme?

A considerable Council resource is spent responding to service requests and complaints directly related to HMOs. These include complaints of pests, noise, disrepair and other issues. Wards with high concentrations of HMOs are also linked to complaints about domestic waste being left out on the wrong day and requests for street sweeping. Statistics from Avon Fire and Rescue Service also indicate that HMOs in B&NES are nearly twice as likely to have a fire as a single household property.

The area proposed for additional licensing has been chosen because it contains the highest concentration of shared house type HMOs in B&NES, estimated to be around 1400 properties. Some occupants of HMOs in the selected area have also indicated to us that the management of their properties is not always as effective as it could be. In some properties fire precautions do not meet minimum safety requirements and waste and garden management is not satisfactory.

Local residents of Oldfield, Westmoreland and Widcombe have also expressed their concerns to the Council relating to HMOs and how they are having a detrimental effect on neighbourhoods. The main concerns from non-HMO residents relate to waste, excessive noise, badly maintained gardens and the poor visual appearance affecting the amenity of the local area. More details can be found in the evidence report.

What properties are proposed to be included?

An HMO is a property occupied by three or more persons from two or more households; a household could be a single person or persons related to each other.

A household can consist of: husband, wife, co-habitee, child, step-child, foster-child, grandchild, parent, step-parent, foster-parent, grandparent, brother, half-brother, sister, half-sister, aunt, uncle, niece, nephew, cousin.

Currently all HMOs with 3 or more storeys and 5 or more occupants with shared facilities have to be licensed under the Council's mandatory licensing scheme.

**Bath & North East
Somerset Council**

The Council are proposing to licence all HMOs that are not already subject to mandatory licensing, with the exception of:

- Buildings converted entirely into self-contained flats (s257 HMOs), although the individual flats maybe licensable in their own right.
- Purpose built student accommodation where the organisation has signed up to the ANUK/Unipol Code of Standards for Larger Residential Developments or The National Code of Standards for larger Developments.

What is the suggested additional licensing scheme area?

The majority of HMOs with shared facilities known to Housing Services are contained within the three Wards of Westmoreland, Oldfield and Widcombe. The Council is proposing an additional licensing scheme centred around these 3 Wards along with small parts of adjoining Wards including Twerton, Bathwick, Southdown and Lyncombe.

What are the benefits of additional licensing?

When properties are neglected or poorly managed the impact on tenants and the local community can be considerable. Additional licensing will enable Housing Services and its partners to work with landlords to raise standards in the private rented sector and to significantly reduce the impact that large concentrations of private rented accommodation have on the surrounding neighbourhood.

How will additional licensing work in practice?

Anyone who owns or manages an HMO that falls within the additional licensing scheme will need to apply to Bath and North East Somerset Council for a Licence. Failure to do so can result in prosecution, a fine of up to £20,000 and being prevented from managing a licensable HMO in the future.

Fees will be charged for each licence in order for the Council to fully recover its costs. A licensing fee starting at £675 for a 5 year licence is proposed, along with an increase of £30 for each additional unit/occupant.

The public consultation ends on the 30th November 2012.

To find out more and respond to the online consultation visit www.bathnes.gov.uk/hmos