

Additional HMO Licensing Scheme 2024-2029

Appendix 4 Continued

Consultation Written Findings.

Appendix 4: Written responses to consultation (verbatim)

Response 1

Barry Francis
Director Environment and Resident
Experience
London Borough of Haringey

Please reply to: Doug Wilkinson
Director of Environment & Street
Scene
Email: Doug.wilkinson@enfield.gov.uk
Phone:
My Ref:
Your Ref:
Date: 09 January 2024

Dear Mr Francis

London Borough of Haringey - Private Rented Housing Licensing Consultation

I am writing in response to your public consultation regarding the renewal of Haringey's additional licensing scheme.

Enfield Council is in full support of the council's proposal to renew a borough wide additional licensing scheme in Haringey. Having introduced two discretionary licensing schemes in Enfield; a borough wide additional licensing scheme in September 2020 and a large scale selective licensing scheme covering 14 wards in September 2021, we are already seeing how licensing promotes an improvement in property conditions and reduces anti-social behaviour through better and effective management.

We know landlords operate across borough boundaries and we believe that Haringey's proposal to redesignate the additional licensing scheme will continue to have a positive impact in our boroughs by improving the knowledge and management standards of landlords working across borough boundaries, and at the same time make it difficult for non-compliant landlords to operate.

As your supporting evidence shows an ever greater number of Haringey residents are living in shared accommodation and we know that these properties are much more likely to have disrepair and hazards. The renewal of the additional licensing scheme will help those tenants who are often vulnerable, live in safe and decent accommodation. Licensing requires landlords to proactively manage their properties

Simon Pollock
Interim Executive Director of Environment and Communities
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and take action to address any problems in order to comply with licence conditions, encouraging better standards of tenancy and property management.

We believe all residents deserve access to decent, good quality homes and Haringey's proposed redesignation of the additional licensing scheme will provide the best opportunity to continue to improve standards in accommodation which is poorly managed and does not meet the legal requirements. It also addresses property and tenant related ASB issues which have far reaching benefits for your wider community.

Property licensing is an important tool to bring about improvements in the private rented sector and I wish you every success building on the achievements of your current scheme in your new proposal.

Yours sincerely



Doug Wilkinson
Director of Environment & Street Scene

Enfield Council has launched a series of 14 e-newsletters covering a range of topics that provide residents with more frequent Council news and service updates. More than 40,000 people have already signed up, make sure you're one of them. You can register at www.enfield.gov.uk/newsletters

Response 2

Written response to Consultation on

Proposed new additional licensing scheme for houses in multiple occupation in Haringey 2024-2029

1.0 Introduction

1.1 Having read the consultation papers, I wish to suggest additional conditions to be added to all licensed HMOs in the Borough of Haringey. There are also omissions in the Consultation reports which in my view should be addressed when the Council report to the Cabinet is prepared with legal implications: first, the impact of the Renters (Reform) Bill when enacted, which is expected to come into force on 1st October 2024, and will apply to all new tenancies granted on or after its

commencement date. For existing tenancies, it will apply once the fixed term expires. The second omission is the statutory Regulators' Code. The objective of improving management of HMOs in the Consultation should be pursued within the Regulators Code and this will require additional measures for communication between the landlord/Agent and occupiers. These omissions to be rectified before the report is finalised to be presented to Haringey's Cabinet Committee

1.2 I support the stated objective that, in Haringey, HMO accommodation is to be good quality, safe and well managed, and agree the proposition in paragraph 4.4 of the Consultation Report that housing conditions are affected by the level of maintenance, quality of repair and management, the age of the property, thermal efficiency, and type of construction – and, I would add, works of conversion, whether or not with planning permission or building regulation consent (and usually with neither). However, licensing and licence conditions by themselves will not produce high quality outcomes, and the Council enforcement in my experience is directed at rogue landlords and abuses, rather than routine complaints and I question whether more could be done to structure mediation between HMO managers/agents and tenants on the application of conditions or legal requirements.

1.3 The new Ombudsman system required under the Renters (Reform) Bill will have to consider HMO complaints: I cannot see that the 2018 reforms of HMOs address the management of complaints. The Council's on-line form for reporting repairs to the Landlord/Agent needs an overhaul, and anticipate good practice recommendations of an Ombudsman Service to Occupiers/Tenants, Landlords/Agents and Council Officers. Good and reliable communication is a key issue in raising management standards, and I suggest an additional condition. I also recommend that the Council review membership of accredited organisations and consider issuing a quality mark; the RICS Codes seem to me to be particularly relevant. I look at the additional conditions the Council propose and set out responses to on the on-line questionnaire.

1.4 Government Guidance to Local Authorities accompanying the 2018 regulations was first published in June 2018 and updated twice, first with updated wording about how to handle enforcement on room sizes and secondly in June 2019 to include an encouragement of join up between planning and licensing teams at local authority level. Housing Minister Heather Wheeler said: Everyone deserves a decent and safe place to live. *"The new guidance for landlords will further protect private renters against bad and overcrowded conditions and poor management practice."* The words I underline depart from current realities.

1.5 The introduction to the Government Guidance gives the following overview of the HMO sector, based on the English Housing Survey 2016 to 2017: headline report from National Statistics states: *"The private rented sector is an important part of our housing market, with 4.7 million households in England. The sector has undergone rapid growth over the last ten years. It is the second largest tenure in England, representing 20 per cent of all households in England. Houses in multiple occupation (HMOs) form a vital part of this sector, often providing cheaper accommodation for people whose housing options are limited.*

HMOs are known to be commonly occupied by students but there are also a growing number of young professionals and migrant workers sharing houses and flats. Some HMOs are occupied by the most vulnerable people in our society.

These people live in properties that were not built for multiple occupation, and the risk of overcrowding and fire can be greater than with other types of accommodation. We want to support good private landlords who provide decent well-maintained homes and not impose unnecessary regulation.

The nature of HMOs means that regulation of this part of the sector is widely agreed to be necessary. However, it is important that this regulation is proportionate and targeted.

To meet the Government's objective in the words I have underlined, and which accords with the ethos of the Regulators' Code, some new initiatives are required. The Council should take the opportunity to address all licensed HMOs to improve management practice of HMOs and communication between licence holders and tenant occupiers.

1.6 For the last 40 years I have lived in an HMO in Highgate. The building was constructed in Edwardian times and in the last 25 years, as tenants protected under the Rent Acts have died or left, the owners have self-contained the majority of rooms into separate flats. The premises have been subject to licensing since compulsory was first introduced, and updated following the Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 and the Mandatory Conditions Regulations 2018. By profession, I am a teacher of economics. The consultation states that *"Responses to the survey will be confidential, although written responses will be passed back to the council for their consideration. Personal information will only be passed onto the council where you have agreed to do so."* I do not agree to the disclosure of my personal data.

2.0 Omissions in the Consultation Report to be addressed before Cabinet

The Renters (Reform) Bill

2.1 The proposed abolition of Section 21 (no-fault eviction) has been the most controversial part of the Bill, but there are many other significant proposals in the Renters (Reform) Bill that affect tenants, letting agents, and landlords - such as the move to rolling, periodic tenancies, new rules for pets in lets, a new property ombudsman, and a new property proposal for a Decent Homes Standard in the Private sector. On 15th November 2023 the Government tabled amendments to the Renters Reform Bill to make it illegal for landlords and agents to have blanket bans on renting to people who receive benefits or who have children.

2.2 The Bill introduces a new Ombudsman that private landlords must join. The Ombudsman is intended to provide fair, impartial, and binding resolution to many issues and to be quicker, cheaper, and less adversarial than the court system. Alongside this, a Decent Homes Standard will be applied to the private rented sector for the first time. The new standard will set a clear bar for what tenants should expect from their home ensuring it is safe, warm and decent. It will be set following further consultation and will help to meet the target of reducing non-decency in rented homes by 50 per cent by 2030.

2.3 The Bill gives tenants the right to request a pet in their property, which the landlord must consider and cannot unreasonably refuse. The Bill will amend the Tenant Fees Act 2019 so that landlords can require pet insurance to cover any damage to their property. The Cabinet should consider whether pets in HMO properties can create a nuisance and should not be allowed.

2.4 During the Committee Stage, the Bill was amended to introduce a new Mandatory Ground for Possession for student HMOs to allow a landlord to recover possession of an HMO let to full-time students at the end of the academic year (1 June to 31 September), in order to let it to students again.

The Regulator's Code

2.5 All the regulatory functions exercisable by local authorities under Parts 2-5 of the Housing Act 2004 (including any regulatory functions conferred by subordinate legislation) are subject to the Regulators' Code which came into statutory effect on 6 April 2014 under the Legislative and Regulatory Reform Act 2006. The Code was made under Part 1 of the Legislative and Regulatory Reform Act 2006, and was extended by the Enterprise Act 2016, requiring regulators other than

local authorities to formally report on the effect that the Regulators' Code has on the way they exercise their regulatory functions and the impacts of this on business. However, this additional obligation is not yet in force, and BEIS will engage with regulators before it is introduced. 2.6 In the foreword to the Code the Minister of State wrote: "*Regulators within scope of the Regulators' Code are diverse but they share a common primary purpose – to regulate for the protection of the vulnerable, the environment, social or other objective. This Code does not detract from these core purposes but seeks to promote proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue and understanding between regulators and those they regulate.*"

2.7 It is a matter for the Council to consider how to give effect to this statutory Code in the circumstances, but the first principle of the Code is that Regulators should carry out their activities in a way that supports those they regulate to comply and grow. Paragon Banking Group's PRS report for Q1 2023 in England shows that HMO property generated the best rental yields at 6%, versus 5.3% for houses and 5% for flats and bungalows. And their latest research shows that HMO yields around the UK are currently varying from around 6% to 9% (as at mid-2023). (The Q1 2023 Private Rented Sector (PRS) Trends report was developed following analysis of data gained through in-depth interviews with 683 landlords. Research agency BVA BDRC, in partnership with the National Residential Landlords Association (NRLA), conducted these interviews between March and April 2023.)

2.8 Specialist websites for HMO investors (e.g. Urbanist Architecture) advise that, when compared to standard buy-to-let rental properties, on an HMO you should expect a minimum of 12% gross yield, and on average a likely 15% realistic gross yield. The timing of new lets and rent reviews is important as tenant demand in the UK surges by 64% in September, whilst available rental stock declines by 10% (compared with the normal monthly averages). This needs to be reviewed in the light of the changes required by the Renters (Reform) Bill, and any tax efficiencies that can be claimed. The Research Report "Property Supply at the Lower End of the English Private Rented Sector" by Julie Rugg and Alison Wallace, published by the University of York (White Rose Research Online URL for this paper: <https://eprints.whiterose.ac.uk/177564/> Version: Published Version) last modified 08 February 2024, at page 112 gives a Landlord's perspective on the Housing Benefit market, the regulatory burden and the hassle of communication. There are management issues to be addressed in the interests of Landlords/Agents and Tenants/Occupiers.

2.8 In Haringey the average number of licences per holder is 1.4, indicating a small percentage of professional landlords and agents, and apart from the fee discount for membership of accredited organisations there is no information of how the Council support Landlord and Occupiers /Tenants in compliance. The Council has an on-line form for reporting repairs. It would be helpful to revise the form to include photographs and a note on the law of repairs and tax. Communication on Notice Boards e.g. of workmen, their tasks, competence and duration would help with calendars of tenants working from home.

2.9 A landlord's basic responsibilities are affected by the Homes (Fitness for Human Habitation) Act 2018, under which rented properties must meet the minimum standards for human habitation. This relates to areas such as heating and ventilation, water and sanitation, freedom from pests and dampness, water tightness, and general safety.

A landlord's legal responsibilities for repairs generally fall into the following categories:

- Repairs to the property's structure, including walls, windows, and doors.
- Repairs to the property's exterior, including roofs and gutters.
- Repairs to sinks, baths, and other sanitary fittings including pipes and drains.

- Repairs to the heating and hot water systems, including boilers, central heating, and fires.
- Repairs to gas appliances, pipes, flues, and ventilation. This includes an annual gas safety check.
- Repairs to electrical wiring. This includes a periodic electrical safety inspection.
- Repairs to damages that are caused by other maintenance issues. (Such as if a roof leak damages internal plaster and decoration.)

HMRC publish tax guidance <https://www.gov.uk/renting-out-a-property/paying-tax> with very little on HMOs. Fees of a Professional organisation relevant to a taxpayer's business are tax deductible, and any agents who are not accredited should be strongly encouraged to raise their game! A Tax consultant could give a presentation at the Haringey Landlord Forum

2.10 Many local authorities work in partnership with private sector landlords and letting agents through their landlord's accreditation scheme and landlord forum. One of the unfortunate realities of accreditation schemes is that they tend to attract good landlords but have little impact on poor landlords. At paragraph 3.7 below I make a suggestion on raising the profile of accredited landlords and agents. Haringey has a Landlord Forum where the suggestion can be discussed. The aims for the Landlord forum are to:

- promote and share good practice around good quality homes in the sector
- enhance understanding of what landlords are doing in the borough
- identify any emerging trends/issues locally
- enhance understanding of the Council's Private Sector Enforcement team's approach to licensing and enforcement
- highlight upcoming changes to legislation
- discuss consultations
- access Council officers to raise serious issues
- identify any landlords who want to work with the Council

The Council's web page on the Forum seems to indicate that the Consultation on additional HMO licensing was not discussed at the January meeting of the Forum, and if that is so this seems a failed opportunity.

3.0 Accredited Organisations

3.1 The Consultation paper considers alternatives and on pages 21 - 22 states *The Council could rely on voluntary accreditation schemes such as the London Landlord Accreditation Scheme (LLAS) or landlord membership organisations, such as the National Residential Landlords Association (NRLA). These can help to support 22 and improve a professional approach by landlords, and we have encouraged this by promoting voluntary regulation through voluntary accreditation schemes, but this does not give the Council any additional powers to ensure compliance.*

3.2 Landlord accreditation schemes are voluntary schemes with the aim of encouraging good practice amongst landlords and agents and can either be property based, in that each individual property is accredited or the individual landlord or agent is accredited. A successful accreditation scheme can help to increase the supply of good quality accommodation to the benefit of existing and potential tenants. It also helps to foster better landlord/tenant relationships and reduces the need for intervention by local authority officers. Accreditation is an indication that the person responsible for managing a

rented property is educated in his responsibilities and expectations, understands best practice, is keeping abreast of his or her responsibilities and wishes to stay informed. Accreditation generally will need to be renewed every five years which involves undertaking the course again. There are, however, dispensations if it is proved that the Agent or Landlord has had have relevant Continuous Professional Development.

3.3 The purpose of a Landlords Accreditation schemes is to provide education, guidance and support to Managing Agents, Landlords and Licence Holders, of their responsibilities in managing properties (of all type) in the Private Rented Sector. For example, at the next Training organised by London Landlords (an on-line Virtual conference on the 29th February 2024) presentations will be on everything that is topical in the private rented sector (PRS) including:

- Rentals Reform Bill update
- General Legal update including Courts and Tribunals
- Property Licensing update
- HMO Management, law & Practice, Rent Repayment Orders
- How to save on Property Tax

- Damp & Mould, are you aware of the guidance on Damp and Mould?
- Extended Expert Panel Session to answer all your questions, so prepare your questions in advance & bring them along on the day.
- Compliance, and robust enforcement
- Dispute resolution
- End of arbitrary rent review clauses
- Introduction of a PRS ombudsman
- Ban on no DSS & no children adverts
- Decent Homes Standard

3.4 HMO management is only one topic in the twelve Presentations, indicating that the issues of HMO management do not have a high profile. Newham has a star rating scheme to rate all the Borough's letting agents from zero to five stars (where five is the best) and then publish the list in full on the Council's website. The ratings are based on the results of Newham's Fair Lettings Project, which over two years has seen all letting agents in the borough audited by the council. The audit considered performance, compliance with the law, delivery of best practice, and customer feedback. It resulted in the award of a star rating for each agency.

3.5 The RICS have over 200 training courses where RICS Members pay half price, and non-members full price. For example, [An introduction to Residential Service Charge Dispute Resolution](#), a video training course is £30 plus VAT to non-members and £15 plus VAT to Members and covers the following topics:

- Advising on service charges
- Disputes
- RICS Service Charge Residential Management Code
- Complaints
- The role of the ADR and mediation
- Rules and Law

There will be changes in this area of management when Part 3 of the Leasehold and Freehold Reform Bill, introduced in Parliament in November 2023, is enacted. These will require transparency over leaseholders' service charges so all leaseholders have better transparency over the costs they are

being charged by their freeholder or managing agent in a standardised comparable format and can scrutinise and better challenge them if they are unreasonable. This will bring greater focus on good practice in HMO services apportionments and recovery.

3.6 In response to a question of mine on RICS' Service Charge Residential Management Code 3rd Edition Mr. Kaveramma Subbayya confirmed that under the Haringey HMO licence application Process, where there is a leasehold and freehold interest all interested parties are written to with a copy of the licence, conditions of the licence that encompasses paragraphs 9.2 and 9.4 together with a detailed schedule of works that relates to Cat 1 hazards as defined in the Housing Act 2004 and fire safety measures to dwellings and communal areas of all type. I revert to this Code when considering conditions

3.7 One of the questions in the Consultation is whether the fees are reasonable. I have compared the fees for all the London Boroughs with the initial H as a sample

- Hackney £1380 Accredited Landlord 1290
- Harrow charges a standard HMO licence fee of £1,623
- Havering charge a standard licence application fee of £1,219 for an HMO with up to five letting. The fee increases to up £1,954 if there are 20 or more lettings.
- Hillingdon charge £1,502 - £1001.38 on application and a further £500.67 if the application is successful
- Hounslow Council charge a standard HMO licensing fee of £1,380 regardless of the size of the property. There is a £90 discount for members of the London Landlord Accreditation Scheme, a recognised landlord association or a relevant professional body.

Judging by this limited comparison, the fees proposed by Haringey are modest. I question, however, whether the best use is made of memberships of the London Landlord Accreditation Scheme, or of a relevant professional body.

3.8 I ask that the relevant accreditation of the Licence holder be noted on the Licence, and that the Council consider granting a quality mark to licensed HMOs taking into account i) accreditation, communications and records of complaints, ii) sound testing compliance with Part E of the current building regulations, iii) security, iv) Anti-Social Behaviour key metrics, when mandatory reporting has been developed by the Government under its Anti-Social Behaviour Action Plan v) compliance with the law and licence conditions, vi) delivery of best practice, and vii) customer feedback.

3.9 Newham's Fair Lettings Project should be examined for any advice on lessons for achieving good quality, safe and well managed HMOs. The information capture for such a quality mark can be developed systematically from the Council records and individual property records with the cooperation of tenants and occupiers and will improve management practice. It will also meet objectives of the Regulators' Code by promoting proportionate, consistent and targeted regulatory activity through the development of transparent and effective dialogue.

4.0 Conditions

4.1 I refer at paragraph 3.6 above to the RICS' Service Charge Residential Management Code (3rd Edition), particularly paragraphs 9.2 and 9.4. The introduction to the Code states:

This Code, now in its third edition, has been approved by the Secretary of State and is effective from 1 June 2016. It applies only to residential leasehold properties in England but practitioners operating in other parts of the UK are encouraged to follow the best practice guidelines contained in the Code.

This Code has been prepared to promote desirable practices in respect of the management of residential leasehold property. Successful management can only be achieved through cooperation and a mutual understanding of the procedures necessary for the effective management of property as well as of the problems that can arise.

The Code is therefore intended to be read by landlords, leaseholders, managing agents, managers and occupiers of leasehold property. Although most of the Code is aimed directly at managing agents of residential leasehold property, parts are specifically intended for other parties such as owners and professional advisers.

4.2 Paragraph 9.2 of the Code states:

Leaseholders should be told how and to whom repairs should be reported. This process should be as straightforward as possible and can include modern forms of communication, such as email and text messaging, to improve the ease and availability of reporting regimes. You should deal promptly with leaseholder's reports of disrepair, the remedy of which is the landlord's responsibility, and you should have a notified procedure for dealing with urgent and out-of-hours repair work. You should also have a procedure for dealing with any health and safety implications.

You should keep residents informed of any actions or proposed actions and, where necessary, make convenient appointments for contractors to attend. Communal parts or services, however, will require most of the repairs, which should not need access arrangements. You should notify residents of target timescales for responses to repairs, which may vary depending upon the urgency and nature of the repair. Depending on the nature of the repair and its impact, residents should be informed of contractors' start dates and any contact details prior to works being commenced.

You should have control systems in place to ensure that works have been completed to an acceptable standard prior to authorising payment of any invoice. Checks should be proportionate to the level or costs incurred. Repair work should be cost effective taking into account its durability and expense. In the long term it may prove more cost effective to replace than to continue to repair. In certain circumstances work which is considered not to be of a reasonable standard can be the subject of court action on the basis of a breach of contract. Section 13 Supply of Goods and Services Act 1982

4.3 Paragraph 9.4 of the Code states:

Unless it is a leaseholder's or other party's obligation, and where costs are recoverable under the terms of the lease, you should arrange for the regular cleaning of all internal common areas including among other things corridors, staircases, glass in doors and windows accessible from common areas.

Cleaning materials must be stored safely in accordance with the COSHH 2002 Regulations. Landings, corridors and staircases should be kept clear and safe.

Control of Substances Hazardous to Health Regulations 2002 Regulatory Reform (Fire Safety) Order 2005 Health and Safety at Work Act etc. 1974

Unless it is a leaseholder's obligation, you should keep shared garden areas tended to a reasonable standard consistent with the quality of the property. The gardening service should normally include:

- a) grass cutting and lawn maintenance*
- b) weeding and pruning; and*
- c) appropriate replacement of shrubs, trees and plants.*

Garden waste should be removed or composted on-site in a suitable screened compound remote from any dwelling or removed by a suitably licensed contractor.

Environmental Protection Act 1990, Controlled Waste Regulations 1992

You should carefully consider the implications of requests by leaseholders to be allowed to undertake the above roles themselves, subject to the arranging of insurance cover and consideration of safety requirements.

4.4 Mr Kaveriamma Subbayya responded to my question as to whether these provisions could be incorporated into new licence conditions by saying (I paraphrase) that the Council must adhere to Government Guidance but he was able to confirm that where a HMO has a Freeholder and long lease the works required and conditions complied with met the requirement of 9.2 and 9.4 and were communicated to all parties.

4.5 I am not aware that the Government Guidance prevents the Council incorporating conditions on communication with tenants and cleaning of common parts (suitably apportioned)- carefully considering requests by tenants to undertake such roles themselves. As the foreword to the Code emphasises: ***Successful management can only be achieved through cooperation and a mutual understanding of the procedures necessary for the effective management of property as well as of the problems that can arise.*** There is case law on the required reasonable behaviour of a landlord giving notice of works, and there is also case law on self-help by tenants.

4.6 The Courts tell us that works carried out in breach of a covenant of quiet enjoyment must be undertaken reasonably, that is

- (a) the landlord has taken all reasonable steps to minimise the disturbance to the tenant caused thereby;
- (b) In considering what can reasonably be carried out, it is relevant what knowledge or notice the tenant had of the works intended to be carried out by the landlord at the commencement of the lease;
- (c) An offer by the landlord of financial compensation to the tenant to compensate the tenant for disturbance caused by the works is a factor which the Court is entitled to take into account in considering the overall reasonableness of the steps which the landlord has taken

Timothy Taylor Ltd v Mayfair House Corporation & Anor [2016] EWHC 1075 (Ch) as applied by Mr Justice Nugee (now Lord Justice Nugee) in Jafari-v- Tareem Limited [2019] EWHC 3119 Ch

These principles apply to all tenants. As a minimum reasonable notice must be given of works which cause disturbance to tenants particularly at unsocial hours.

4.7 So far as work undertaken by a tenant is concerned, such arrangements should be encouraged. It is well established that in the Courts it would be unjust to allow the landlord to recover his rent

without taking into account the damages which it is alleged the tenant has suffered through failure by the landlord to perform his part of the agreement: *Smith –v- Muscat* Court of Appeal [2003] EWCA Civ 962.

4.8 The introduction to the Licensing Consultation states that *Building upon the existing licencing scheme, the Council will continue to improve living conditions for residents living in HMO accommodation and ensure they have a better quality of life.* To meet this objective both licence holders and tenants need a system of Communication, with an agreed method of advance notice so that works of disturbance by unannounced workmen (whether competent or not) do not disrupt lives out of the blue. I suggest wording as follows – repeated below.

Communications

1. *The Landlord shall maintain a notice board in a prominent area in the Common parts of the property and give notice from time to time on the notice board (whether or not notice is also given by text, email WhatsApp or social media)of the works to be carried out to the property, the days and hours when the works will be done, and the security arrangements. A copy of the Government’s Guidance to Tenants about the Homes (Fitness for Human Habitation) Act 2018 2018 shall be affixed to the Notice Board.*

<https://www.gov.uk/government/publications/homes-fitness-for-human-habitation-act-2018/guidefor-tenants-homes-fitness-for-human-habitation-act-2018>.

2. *The Council shall provide to the Landlord and any Tenants upon application a template request form from the Landlord to the Tenants, and the Tenant to the Landlord concerning Anti-Social Behaviour metrics, with notes on the community trigger threshold under the Anti-Social Behaviour Crime and Policing Act 2014.*

3. *An out-of –hours service shall be available for emergencies.*

4.9 Under Section 57(3) Housing Act 2004 the Council is to take a co-ordinated approach in dealing with Anti-Social Behaviour (ASB). The draft additional conditions proposed by the Council make no mention of the Government’s ASB Action Plan, which includes (at paragraph 78(c)) that the Government will work to promote mandatory reporting of Key ASB metrics. Nor do the Council Conditions refer to the Community Trigger under the ASB Crime and Policing Act 2014. The Council’s draft conditions regarding ASB must be co-ordinated with these measures and place a responsibility on tenants and Occupiers (including visitors) and workmen accordingly.

4.10 The Council’s draft Condition 8 (Property Management) makes no reference to tenancies where rent is payable weekly. In such circumstances, a rent book in the prescribed form must be provided. Section 4 Landlord and Tenant Act 1985 requires the rent book or similar document to be provided, and section 5 describes what information must be contained. The rent book must contain the name and address of the landlord plus other information as prescribed. A prescribed form must be used where the tenancy is an assured shorthold tenancy. A failure to provide a rent book is a criminal offence, as is the demand for rent without a rent book. An additional provision must be added to the Council draft accordingly.

5 Consultation Questions

1. - I am a tenant living in the Highgate Ward in rooms in an HMO with shared facilities.

- 2.- I strongly agree with the Proposal for additional licensing. The whole of London has accommodation pressures and need for HMOs as affordable but well managed housing. Mention should be made of the Mayor of London's HMO checker.

3. I tend to agree that the proposed licence conditions will improve management conditions but they are limited in addressing problems of noise, security and Anti-social behaviour – for which I recommend some improvements

4. The question as to whether Landlords must take quicker action on complaints are made is tendentious. It is essential that communication is efficient, timely and proportionate and acted on appropriately.

5. As to whether Landlords must ensure that any repair / improvement works or pest treatments be undertaken by a competent person, yes generally. The agent may, or may not be competent, but reasonable notice must be given to tenants, particularly if the work is likely to cause disturbance or take place at unsocial hours, and the names of the workmen given in advance also. There is a difference in the tax treatment of works of maintenance and works that improve the capital value of the property

6. Landlords must make sure that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only

7. Landlords must make sure that all outhouses, garages, and sheds are kept secure and are used for their intended purpose only

8. New tenants should be, given up to date and accurate information on waste and recycling at the start of their occupation

9. Landlords must make sure that the exterior of the HMO is kept clean and tidy and that issues of routine maintenance affecting the exterior, such as broken windows, are addressed promptly

- 10 Landlords and Tenants must make sure that old furniture, bedding, rubbish or refuse from the HMO is not left on, or immediately outside, the HMO or private land this is a joint responsibility

- 11 Landlords must make sure that any type of waste which the Authority does not routinely collect, such as hazardous waste is disposed of in a safe and lawful manner

12 Landlords must make sure that any type of waste which the Authority does not routinely collect, such as hazardous waste is disposed of in a safe and lawful manner 13 Are there any other conditions you would like the Council to consider Yes – the following:

Communications

1. *The Landlord shall maintain a notice board in a prominent area in the Common parts of the property and give notice from time to time on the notice board (whether or not notice is also given by text, email WhatsApp or social media) of the works to be carried out to the property, the days and hours when the works will be done, and the security arrangements. A copy of the Government's Guidance to Tenants about the Homes (Fitness for Human Habitation) Act 2018 shall be affixed to the Notice Board.*

<https://www.gov.uk/government/publications/homes-fitness-for-human-habitation-act-2018/guide-for-tenants-homes-fitness-for-human-habitation-act-2018>.

2. *The Council shall provide to the Landlord and any Tenants upon application a template request form from the Landlord to the Tenants, and the Tenant to the Landlord concerning Anti-Social Behaviour metrics, with notes on the community trigger threshold under the Anti-Social Behaviour Crime and Policing Act 2014.*

3. *An out-of-hours service shall be available for emergencies.*

14. Fees. The fees proposed are modest, but the Council should publish which accreditations (if any) are held by the landlord or agents

15. Q Licences can last up to a period of five years. Where the Council has determined that there is cause for concern regarding premises or management arrangements, or when a landlord fails to apply for a licence voluntarily, the Council may determine that the licence should be granted for a shorter period.

The Council are proposing to only issue a licence for 1 year in these circumstances.

AI agree with this proposal provided that the Council inform the applicant what action on their part is necessary to be issued with a five-year licence

16. I do not agree that in Haringey most HMOs are well managed?

17. I do not agree that most HMOs are in a good state of repair. Very few have Building control approval

18. Most HMOs do not have good waste management systems

19. Noise and ASB are not well managed well by HMO landlords

20. Please indicate which of the following you have experienced with your accommodation. Please select all that apply.

Poor fire safety - *Yes and persistent since 2017*

Not enough kitchens and bathrooms for the number of people sharing

Overcrowding

Damp and mould- *Yes in own accommodation and communal areas*

Poor property conditions

Harassment or ASB from other tenants

Harassment from your landlord or letting agent- *Yes and continuous*

Not enough provision for your waste

Not enough information on waste collection or recycling

No information on how or who to report a problem to at the property- *A method of sorts but always a delayed response*

Not given a copy of Gas/Electrical Safety Certificate at the start of your tenancy

Not given a copy of Energy Performance Certificate (EPC)at the start of your tenancy

Not having your deposit protected

None of the above / No issues

21. To what extent do you agree or disagree that landlords in Haringey maintain their properties to a good standard?

Strongly disagree

22. Public meetings

The Council will be looking to run a number of public meetings to discuss the proposal and gather your feedback.

Would you be interested in attending one of our public meetings?

Yes

No

23. Keeping you informed about the proposal

If the Council decides to go ahead with the proposed scheme, would you like them to contact you? By clicking 'Yes' you are consenting to having your email address provided to the Council so that they are able to contact you directly.

Yes, I would be interested

Section 8: About you

Thank you for providing your feedback on this consultation.

Finally, it would be really helpful to find out a bit more about you. This is to understand the views of different groups of people living in and around the borough.

24. Which age group applies to you?

60 to 74

25. Please tick the box that best describes your sex.

Male

26. Trans is an umbrella term to describe people whose gender identity is not the same as, or does not sit comfortably with, the sex they were regarded to be at birth.

Do you consider yourself to be trans?

No

27. Under the Equality Act 2010, a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day- to-day activities.

Are you disabled?

Yes

28. How would you describe your national identity?

White Irish

29. Which of the following best describes your sexual orientation?

Heterosexual / Straight

30. How would you describe your religion or belief?

Christian

31 Are you pregnant?

No

32. Have you had a baby in the last 12 months?

No

33. Please tick the box that best describes you.

Single

34. Please tick which of the following benefits you receive, if any. Please select all that apply.

None of the above

35. Which of these qualifications do you have?

Tick every box that applies if you have any of the qualifications listed. If your UK qualification is not listed, tick the box that contains its nearest equivalent. If you have qualifications gained outside the UK, tick the 'Foreign qualifications' box and the nearest UK equivalents (if known).

Level 4 or above - e.g. first or higher degree, professional qualifications or other equivalent higher education qualifications

Other qualifications - e.g. other vocational / work related qualifications and non-UK / foreign qualifications

36. Please tick the boxes that best describe your preferred language. **English**

6. Conclusions

6.1 Achieving high standards of residential quality and design internally and externally are matters that the 2021 London Plan seeks to deliver through Policy D56 Quality and Design of Housing Developments, in that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

6.2 The additional licensing proposed will divert resources within the Council's Private Sector Team as will the requirements of the legislation in Parliament when enacted. When the report is presented to the Haringey Council Cabinet, a legal update on the Renters (Reform Bill) and its impact on HMOs should be given.

6.3 As a long standing occupier of HMO accommodation in Haringey, I am disappointed that no timetable is given for rolling out the new mandatory and discretionary conditions to existing HMOs. The Government policy is for a unified Local Authority approach to HMO licensing is to be put in place and I hope this can be given a timetable and resources in May this year.

7. Recommendations

For the reasons set out above I recommend

7.1 That that the relevant accreditation of the Licence holder be noted on the Licence, and that the Council consider granting a quality mark to licensed HMOs taking into account i) accreditation, communications and records of complaints, ii) sound testing compliance with Part E of the current building regulations, iii) security, iv) Anti-Social Behaviour key metrics, when mandatory reporting has been developed by the Government under its Anti-Social Behaviour Action Plan v) compliance with the law and licence conditions,

vi) delivery of best practice, and vii) customer feedback.

7.2 A condition on communications as follows:

Communications

1. *The Landlord shall maintain a notice board in a prominent area in the Common parts of the property and give notice from time to time on the notice board (whether or not notice is also given by text, email WhatsApp or social media) of the works to be carried out to the property, the days and hours when the works will be done, and the security arrangements. A copy of the Government's Guidance to Tenants about the Homes (Fitness for Human Habitation) Act 2018 shall be affixed to the Notice Board.*

<https://www.gov.uk/government/publications/homes-fitness-for-human-habitation-act-2018/guide-for-tenants-homes-fitness-for-human-habitation-act-2018>.

2. *The Council shall provide to the Landlord and any Tenants upon application a template request form from the Landlord to the Tenants, and the Tenant to the Landlord concerning Anti-Social Behaviour metrics, with notes on the community trigger threshold under the Anti-Social Behaviour Crime and Policing Act 2014.*

3. *An out-of-hours service shall be available for emergencies.*

Response 3

Haringey Council Additional (HMO) Licensing Scheme Consultation (2024-2029)

Response from Propertymark

February 2024

Background

1. Propertymark is the UK's leading professional body of property agents, with nearly 18,000 members. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry leading training programme and mandatory Continuing Professional Development.¹

Consultation overview

2. Haringey Council are consulting on a proposal to implement a borough-wide additional licensing scheme for all eligible Houses of Multiple Occupation within the borough. The newly proposed scheme, if approved, will be in place for five years and will include HMOs not covered by Mandatory Licensing, specifically smaller houses in Multiple Occupation that are privately rented with three or more non-related tenants sharing a kitchen or bathroom. The proposals also include a house which is now a converted block of flats where the standard of the conversion does not meet the relevant building standards and where fewer than two thirds of the flats are owner-occupied.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to Haringey Borough Council's additional HMO licensing scheme consultation. In January, Propertymark attended a virtual consultation session and welcome the proactive approach to improve the availability of HMO properties in the borough. Propertymark is supportive of efforts made by Haringey to improve the standard of private rented sector housing and address the high percentage of properties that pose a risk to health and safety, as evidenced by Mel Research. We welcome the action taken against non-compliant letting agents and landlords who provide poor quality housing. However, we have several concerns about the proposals and effectively do not feel that an additional licensing scheme or continued licensing is the correct way forward to achieve these aims.

¹ www.propertymark.co.uk

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4. Firstly, Propertymark believes the scheme fails to address the conduct of rogue landlords failing to meet existing minimum standards, whereas compliant landlords are unfairly penalised for consistently meeting the standards. Rogue landlords who already fail to meet existing minimum property conditions and fall under the radar of council-led inspections will not voluntarily sign up to the licensing scheme. Resources spent on administrating the licensing scheme to all landlords rather should instead be used to increase the capacity for the Council to identify and inspect the properties of rogue landlords. Licensing schemes have been in operation for several years already creating significant costs for compliant landlords. These costs could be used directly into improving standards and the quality of stock. The fact that the scheme has to be continues leaves us to believe previous licensing schemes have failed in their aims and Haringey have not provided any clarity as to how this scheme will provide any additionality to the previous schemes.
 5. Secondly, while we acknowledge that HMOs eligible for the scheme are significantly more likely to have category 1 and 2 hazards than other rental properties, this does not justify the requirement for landlords with existing HMOs that are compliant to still pay a license fee. We believe that the proposed license fee unfairly penalises compliant landlords who already pay a license fee for existing HMO properties.
 6. Thirdly, we are concerned that the unfair penalties on compliant landlords will a long-lasting and damaging impact on the housing market in Haringey. Landlords committed to upholding good standards of housing may be discouraged from investing, subsequently impacting the proportion of good housing stock within Haringey.
 7. Finally, the data presented in the proposed licensing scheme PDF outlines that the levels of anti-social behaviour and poor housing conditions vary across the different wards within Haringey. With contrasting levels across the borough, the data brings the need for a borough wide scheme in to question. We believe that efforts would be better directed towards supporting landlords in specific wards with the highest levels of poor-quality housing and ASB to tackle this. Severe issues relating to poor housing conditions are not consistent across the borough. Different wards tell different stories; therefore we are questioning whether the proposed scheme is appropriate. Questions

Value for money

8. We understand that following the online consultation event, the scheme will cost Haringey £5 million to operate over the duration of the scheme. We do not believe that this represents value for money for the local authority and that money could be far more efficiently invested by directly supporting landlords.

Ability of the council to improve standards.

9. While we acknowledge efforts from the local authority to continue to work towards improving standards of HMOs, our rationale for strongly disagreeing is founded on two main themes. Firstly, like the preceding scheme, despite its intentions we are concerned that the proposals won't do enough to enforce said agents to register to the scheme and we are not confident following the lack of success from the current licensing scheme. Therefore, in many wards the main issues will remain. We acknowledge that the council has faced difficulties in completing inspections following Covid 19 but we feel efforts are better placed in expanding. We also have reservations that the council will have enough enforcement officers to effectively check all properties across the borough when there are so many eligible HMOs across the borough.

Achieving the aims of the license

10. Propertymark tends to disagree with the proposed license conditions will improve the quality, standard and management of HMOs. As the leading professional membership body for property agents, Propertymark agrees with many of the licensing conditions laid out by the Council as they reflect our own standards. However, our cautions are founded upon the on imposing and enforcing the conditions. Therefore, we are not confident on the scheme actually changing the standard of housing stock in the borough. Our concerns reflect our issues with the current licensing scheme in place:

Duplication of existing standards: as an additional licensing scheme is active we believe the proposed scheme will force a duplication of existing standards. Propertymark members specifically already adhere to many of the licensing requirements. This means that the new conditions will have little impact on agents

already meeting these standards and will be seen as an unnecessary additional cost or administrative burden for no improvements in the standard of the property.

- a. **Poor housing conditions:** Propertymark welcomes Haringey's efforts to address the standard of housing stock within the borough as half of the complaints related to HMO properties. However, the data highlights the contrasting number of complaints between wards. For example, figure 3 highlights how Tottenham Central, West Green and Woodside received the highest number of complaints, whereas, in contrast Alexandra Park and Muswell Hill received no complaints. We question why a boroughwide scheme needs to be applied when there are certain areas where poor housing isn't an issue.
- b. **Anti-social behaviour:** Haringey have identified high levels of anti-social behaviour within the borough but have not highlighted the support on offer for landlords. Support for landlords is inadequate and they are not best equipped to respond. For example, if a landlord or an agent has a tenant causing anti-social behaviour, a section 21 or 8 notice to seek possession from the tenant is the only tool at the landlord's disposal. Although this provides a short-term solution it is unsustainable, and we call for resources to be better directed. We would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police in reducing anti-social behaviour within communities. As an alternative, we would like to know if the council has considered any formal training opportunities for landlords to ensure they are prepared at mitigating tough ASB incidents.

Waste management

11. Our concerns with waste management conditions are the effectiveness they will have on addressing issues with fly tipping and the building up of waste in each area. The proposals to provide information on collection days will fail to make an impact. Landlords and managing agents can only remind tenants of the proper procedures to manage waste but ultimately the responsibility of ensuring waste is disposed of properly is the responsibility of tenants. The condition would therefore have little impact on poor waste management for tenants who do not take on the responsibility to manage waste properly. We would therefore encourage explicit conditions for the tenant around their duty to manage waste.

Fees and charging

12. Propertymark strongly disagrees with the proposed license fee and believes that £1,331 for the 5-year license is extortionate and we are disappointed at the lack of discount available to landlords who hold multiple licenses. While we appreciate the efforts to penalise rogue landlords we believe this fee would instead discourage reputable landlords from investing in the area. We acknowledge the inclusion of accredited landlord schemes, including Propertymark membership, formerly the Association of Residential Letting Agents but question whether this is enough for landlords with multiple properties. Many landlords operating within Haringey may have multiple properties especially those that have property in a block of flats. For these landlords, the price per property is extortionate with no discount for multiple licenses.

Licensing period

13. Propertymark firmly disagrees with the with the prospective reduction to the licensing period. In fact, we would recommend extending the licensing period on the grounds that it provides better value for money for landlords. Between, 2019-2023, Haringey officers undertook 1,129 property inspections and during the consultation session council officials highlighted that negative impact of the pandemic on the number of inspections completed. We believe reducing the licensing period would add undue pressure on the council, whereas measures should be taken to alleviate pressures on inspection numbers.
Impact of the cost of living on landlords

Impact the cost of living has had on landlords.

14. Regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by the cost-of-living crisis and the impact fees could have on the ability of landlords to improve standards. Our members have also told us that a common concern from landlords on licensing schemes is that the costs can be extremely high for landlords who own several properties within a self-contained unit such as a block of flats. We welcome Merton Council's acknowledgement of the high cost for these landlords who offer discounts for multiple licenses within one unit in their proposed scheme and we would advise Haringey to take a similar approach.

Impact on the supply of homes

15. Exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS⁶ found 53% of buy to let properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019². In addition to these concerns, those landlords who remain in the market, often have less money to improve conditions from increased costs. If the decision to operate a selective licensing scheme across most of Haringey is approved, then there is a concern that landlords currently operating within Haringey could invest in neighbouring local authority areas or exit the market altogether. This could result in fewer housing options for people living in Haringey meaning some people might be forced to find housing options outside the area, change employment or break social ties within the community.

Unintended consequences

16. We are pleased to see that Haringey acknowledge that the PRS is an important and increasingly growing tenure that is home to many people living within the London Borough. Renting in parts of London, including Haringey, can be very expensive. The median monthly rent for London is £1,950 compared to £2,130 in Haringey³. With the monthly medium in Haringey being slightly above the London median, the monthly rent remains considerably off limits for many people. Some renters living within Haringey will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis. We previously outlined the possibility that further legislation could reduce the housing options of the most vulnerable from landlords exiting the market there could be further implications on the rent level for those landlords who remain. As is the general law of supply and demand, if the supply of PRS property reduces, the cost of rent for the remaining properties is likely to rise. With already high rental prices within the area, there is a very real danger that many low-income families will be priced out of living in the area.

Using licensing to tackle anti-social behaviour.

² [A shrinking private rented sector | Propertymark](#)

³ <https://apps.london.gov.uk/private-rents/>

17. Haringey have identified high levels of anti-social behaviour within the borough but have not highlighted the support on offer for landlords. Support for landlords is inadequate and they

are not best equipped to respond. For example, if a landlord or an agent has a tenant causing anti-social behaviour, a section 8 notice to seek possession from the tenant is the only tool at the landlord's disposal. Although this provides a short-term solution it is unsustainable, and we call for resources to be better directed. We would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police in reducing anti-social behaviour within communities. As an alternative, we would like to know if the council has considered any formal training opportunities for landlords to ensure they are prepared at mitigating tough ASB incidents.

18. The council have also identified reducing levels of anti-social behaviour and support for landlords dealing with anti-social tenants. Landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse. As one example, if a landlord or their agent had a tenant that was causing anti-social behaviour, the only tool that the landlord or agent could use would be to seek possession from the tenant under a Section 8 notice. While this would remedy the problem in the short-term, the tenant is likely to still occupy this behaviour and all that has been achieved is that the anti-social behaviour has moved from one part of Haringey to another.

19. In this context, it should be noted that with regards to reducing anti-social behaviour, landlords and their agents can only tackle behaviour within their properties. Effectively, they are managing a contract and not behaviour. Landlords and their agents are not responsible in any form for anti-social behaviour occurring outside the property. Nevertheless, we would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police in reducing anti-social behaviour within communities.

Conclusions and alternatives

20. Propertymark would like to raise several topics and alternatives in response that prompts any further comments. If the scheme is approved, the council should consider how they incentivise good practice to reward the compliant landlords. Propertymark believes

those reputable landlords should receive a further discount, especially for those with multiple properties.

21. Furthermore, given the levels of ASB within the borough we would like the council to consider the support they offer for landlords. Attending ASB incidents is a challenging and potentially dangerous environment for landlords to expose themselves to and we would recommend offering formal training opportunities to better equip landlords in dealing with ASB incidents.
22. Propertymark believes that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. The sector is regulated, and enforcement is essential for keeping criminals who exploit landlords and tenants. An active enforcement policy that supports good landlords is crucial as it will remove those who exploit others and create a level playing field. It is essential to understand how the sector operates as landlords can often be victims of criminal activity and antisocial behaviour with their properties being exploited.
23. We would welcome the opportunity to work with Haringey Council to further engage with our members and property agents in the local area.
24. Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected. We oppose this proposal on several grounds which are headed below.

Response 4



Proposed Additional Licensing Scheme in the London Borough of Haringey

Safeagent Consultation Response

12 February 2024

An Introduction to safeagent

Safeagent is a not for profit accrediting organisation for lettings and management agents in the private rented sector. Safeagent (formerly NALS) provides an overarching quality mark, easily recognised by consumers, with minimum entry requirements for agents. Safeagent operates a government approved client money protection scheme and is a training provider recognised by the Scottish and Welsh governments for agents meeting regulatory requirements in those devolved nations.

Safeagent agents are required to:

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

Agents must provide evidence that they continue to meet safeagent criteria on an annual basis to retain their accreditation. The scheme operates UK wide and has 1,700 firms with over 3,000 offices, including agents within the London Borough of Haringey.

We very much welcome the opportunity to contribute to this consultation exercise.

Overview

We understand that Haringey Council is seeking to renew the additional licensing scheme that ends in May 2024. In preparing this consultation response, we have carefully considered the information published on the council's website.

Having reviewed all the documentation, the consultation report leaves some doubt about precisely which HMOs would be included in the proposed additional licensing scheme. For example, section 4.1 of the consultation report only lists properties occupied by 3 or 4 people who share facilities. It makes no reference to converted building test HMOs which may have no shared facilities. It also makes no reference to multi-occupied self-contained flats within certain purpose-built blocks of flats which are exempt from mandatory HMO licensing and may have five or more occupants. It is vital that the public consultation and any subsequent scheme clearly explain the licensing criteria. We have referred later in this submission to section 257 HMOs.

Evidence base

We note there are estimated to be 4,830 HMOs in the borough, with 1,690 mandatory HMO and 2,237 additional licences having been granted.

The report notes just 1,129 HMO property inspections which suggests less than 30% of licensed properties have been inspected since the licensing scheme started. This is far lower than we would have expected. Of the inspections completed, the report says hazards were identified in 315 properties, which suggest 70% of inspected properties were found to be compliant. We would ask the council to explain why so few properties have been inspected during the current scheme, and what would be done differently to increase inspection rates if the licensing scheme is renewed.

Whilst we recognise the challenges presented by the covid pandemic, how was licensing fee income spent if the planned inspection programme was significantly curtailed?

Section 257 HMOs (certain converted blocks of flats)

The consultation proposal says the council wish to include all section 257 HMOs within the additional licensing scheme, which we understand is the approach adopted under the current scheme.

We have concerns about including all such properties within the additional licensing scheme due to the difficulty experienced by letting agents in knowing when a property was converted and whether the conversion satisfies the relevant building standards. It is not something that is reasonable for a letting agent to assess.

In situations where there is a freeholder and separate long leaseholders, the situation is further complicated by the need to determine whether less than two thirds of the flats are owner-occupied. Only the freeholder may possess this information and the tenure of each flat may vary over time.

This would make it extremely difficult for a safeagent letting agent to assess whether a licence is required, despite their best endeavours. For example, it may be that the building did not require a licence when a flat was rented out, but subsequently requires licensing because another leaseholder in the building has rented out their flat. As such, a letting agent could find themselves committing an offence of managing a flat in a licensable building without a licence, simply because another flat had been rented out without their knowledge.

Bringing section 257 HMOs within the additional licensing scheme could also be problematic for long-leasehold owner-occupiers who find their flat is within a licensable building. The licensing fee may push up their service charge and could cause difficulties with their mortgage lender. As the licence would need to be disclosed to a prospective purchaser, some mortgage lenders may be reluctant to lend on a residential mortgage for a flat within a licensed HMO, thus adversely impacting the property's value.

It is also the case that the 2015 general approval to introduce an additional licensing scheme only applies if the council has consulted persons likely to be affected by the scheme designation. Without actively consulting long leaseholder owner occupiers and explaining the implications of licensing section 257 HMOs, the conditions in the general approval would not be met and the additional licensing scheme could not be introduced without Secretary of State approval.

Whilst we are opposed to the idea of including all section 257 HMOs within the additional licensing scheme, we recognise that there are circumstances where a particular type of section 257 HMO may be worthy of more intensive regulation. For example, where a landlord has converted a property into cramped and poorly designed studio flats entirely for private rental without any planning and building regulation approval.

In such circumstances, the additional licensing scheme could be restricted to section 257 HMOs where the whole building and all the individual flats within it are in single ownership or considered to be effectively under the same control. In response to our feedback, several councils have adopted this approach.

Other councils such as Westminster City Council, Newham Council and the Royal Borough of Kensington and Chelsea have listened to our feedback and excluded all section 257 HMOs from their additional licensing schemes.

We would encourage Haringey Council to give this further thought and either narrow the section 257 HMO licensing criteria or remove them entirely from the scheme.

Licensing fees

We recognise that the council need to charge a reasonable fee to cover the cost of administering and enforcing the licensing scheme. It is important that the council implement an efficient and streamlined licence application processing system. This will help to minimise costs and keep fees at a reasonable level, thereby minimising upward pressure on the rent that is charged to tenants.

We understand the council is intending to increase mandatory HMO licensing fees by 10% from £1,210 to £1,331. We understand that if there are more than five units, an extra £100 will be charged for each extra unit (£50 Part A / £50 Part B) whereas the extra over amount is currently £50 per unit. This doubling of the cost seems unreasonably high, and we could find no justification for it within the consultation report.

We were surprised to find no fee discount for licence renewals. Whereas we acknowledge the Part B costs would be the same, there is less work involved in renewing a licence if there have been no material changes. As the Part A cost can only cover the actual cost of processing licences, we think it should be set at a lower level for licence renewals.

We welcome the proposed fee discount for accredited landlords and agents including safeagent, although we would seek clarification about how this will be applied in practice.

For example, a safeagent member may act as licence holder for an overseas landlord. They may also be designated property manager and a UK based landlord who is the licence holder. We would encourage the council to offer the accreditation discount if a safeagent member is either the licence holder or designated property manager. This would align to the approach adopted by many other councils.

Further, we would encourage the council to review the accreditation discount which has remained static despite an uplift in application fees. A £50 discount on a

mandatory HMO licence equates to just 3.7% at five units and 2.7% at ten units. If the council want to drive up professionalism in the private rented sector, a bigger incentive would be helpful. We would highlight councils such as Lewisham and Lambeth which both offer a 20% accreditation fee discount.

We welcome the fee discount for properties with an EPC rating of C or above.

Licence Conditions

We have studied the proposed list of standard licence conditions in Appendix 2.

We have made some suggestions to help improve and fine tune the wording of the conditions. This in turn should help landlords and agents to understand and comply with the requirements.

Condition 2.1

This is marked as a mandatory condition imposed by the Housing Act 2004, but it is not listed in Schedule 4 of the Act. It is a discretionary condition proposed by the Council.

Condition 3.2

The requirement is to provide the tenant with tenancy deposit prescribed information within 30 days, and not at the time the deposit is taken.

Condition 3.3

It is unclear the purpose of this condition when viewed alongside condition 3.5. Condition 3.5 sets out detailed tenancy management arrangements the licence holder must follow to address any ASB issues that occur. The tenancy management arrangements must therefore be those specified in condition 3.5. We would suggest this condition is deleted.

Condition 3.4

Second bullet point: We are unsure what is meant by 'Formal arrangement for the disposal of rubbish and bulky waste' as this service is provided by the council. A more practical approach is included in condition 5.2. We would suggest this is deleted.

Third bullet point: This should be deleted. It contradicts condition 4.1 which requires six monthly (not three monthly) inspections with records kept and provided to the council on demand.

Condition 3.5 (h)

It is unclear whether this is referring to the initial warning letter under (d) or the follow up warning letter under (f). We assume the latter. The requirement to promptly take legal proceedings to address anti-social behaviour (ASB) regardless of the nature and severity of the situation is overly prescriptive. The only practical option for the landlord is to evict the tenant. As such, this condition risks increasing evictions from the private rented sector rather than facilitating a collaborative approach with a view to tenancy sustainment. Further, it fails to recognise the evidential thresholds to evict under a section 8 notice. It would be unreasonable to insist on service of a section 8 notice for adhoc / low level incidents of ASB where there is no prospect the court will grant possession. We would encourage the council to reflect further

on the most appropriate wording and engage with the council's Rehousing Team who provide a tenancy sustainment support to prevent households becoming homeless.

Condition 4.4

Whilst we have no concerns about the overall intention of this condition, the loose drafting creates unintended consequences and an unacceptable compliant risk. There is no definition of 'competent person' and providing a definition to encompass all possible 'repairs, improvements or treatments' will be challenging. Further, it creates doubt whether the 'competent person' assessment is intended for the employee undertaking the work, or their employer. How would a landlord or agent be expected to assess the competency of a roofing contractor's employees? Further, people undertaking the work will rarely be employed directly by the licence holder. They would be employed by the contractor, either on an employee or subcontractor basis. A licence holder would not know the employee's contract of employment. Even assessing competency of a roofing contractor or general builder can be challenging unless the council is insisting that different trades must belong to trade bodies recognised by the council. This also risks drawing work away from locally based self-employed handypersons who undertake non-specialist tasks. The reason for insisting on copies of all receipts and invoices is also unclear. Overall, we think the condition requires substantial revision or deletion.

Condition 4.5

If there is a garden shed, garage or other outbuilding with access permitted under the tenancy agreement, we think it is reasonable to insist that the structure is lockable with keys given to the tenants. Once the tenancy starts, the licence holder or agent has not control over whether the tenant keeps the door locked every day. That can only be checked and advice given during interim inspections.

Condition 4.6

We would suggest a slight revision to the wording, to make clear this condition only applies if the landlord has responsibility for the exterior of the building. For a multioccupied flat in a purpose-built block, responsibility for the exterior of the building would rest with the freeholder.

Condition 5 – Waste Management

Condition 5.1

If tenants breach their tenancy agreement and do not dispose of waste responsibly, we would suggest appropriate action by the licence holder or their managing agent should be to contact the tenants to discuss and resolve the issue. A process for this is set out in condition 3.5.

Condition 5.2

We would encourage the council, as the waste collection authority, to produce a suitable information pack for this purpose and signpost the licence holder to where it can be found.

Condition 5.4

This appears to duplicate condition 5.1. We would suggest the two items are combined and include a clear statement about what action the licence holder should take if tenants breach the condition.

Condition 5.6

We see no need for this condition, as six-monthly interim inspections are already included in condition 4.1. If the council believes it is necessary to further define the purpose of interim inspections, the wording of condition 4.1 can be adjusted. An added concern is that the frequency of 'regular checks' is undefined in this condition. In practice, one interim inspection would cover the property and any garden or yard attached to it.

Condition 5 – Health & Safety

Condition 5.3

This is marked as a mandatory condition imposed by the Housing Act 2004, but it is not listed in Schedule 4 of the Act. It is a discretionary condition proposed by the Council. Further, not all licensed HMOs will require a fire risk assessment under the Regulatory Reform (Fire Safety) Order 2005. For example, it does not apply to houses or flats let on a single tenancy to sharers who have exclusive use of the property. The wording could be adjusted to say a fire risk assessment must be undertaken if the Regulatory Reform (Fire Safety) Order 2005 applies, or wording to that effect.

Condition 5.4 (d)

The wording of this mandatory condition was changed in 2022. It should refer to 'fixed combustion appliance other than a gas cooker'.

Condition 6.1

Many councils provide flexibility to display a copy of the licence or provide the tenants with a copy at the start of their tenancy. We would encourage the council to adopt a more flexible approach as the licence holder cannot stop tenants from removing notices displayed in their home.

Condition 6.3

We disagree with this condition as there is no requirement to display a gas safety certificate in a tenant's home and the licence holder cannot stop tenants from removing notices displayed in their home. Flexibility is requested to display a copy of the latest gas safety certificate or to provide the tenants with a copy. This would align more closely with the gas safety regulations.

General

The introduction to the licence conditions includes useful guidance on HMO planning restrictions. As this is guidance rather than a condition of the licence, we would suggest it is inserted at the end of the licence conditions.

We would encourage the council to standardise the timescale and process for providing documentation to the council. Firstly, we think it should be a written request. A request made verbally could lead to misunderstanding and unintended non-compliance. Secondly, we think the timescale should be standardised. The conditions impose timescales of between 7 days and 28 days for providing information. We would suggest this is standardised to 21 or 28 days. We think 7

days is unreasonably short, particularly if an email is sent to someone on holiday or absent from the office due to illness.

Delivering effective enforcement

It is vital that the council have a well-resourced and effective enforcement team to take action against those landlords and agents that seek to evade the licensing scheme.

Without effective enforcement, new regulatory burdens will fall solely on those that apply for a licence whilst the rogue element of the market continue to evade the scheme and operate under the radar. This creates unfair competition for safeagent members who seek to comply with all their legal responsibilities. They are saddled with extra costs associated with the licence application process and compliance, whilst others evade the scheme completely.

Recognising the important role of letting agents

Letting agents have a critical role to play in effective management of the private rented sector. We would encourage the council to explore mechanisms for effective liaison with letting agents and to acknowledge the benefits of encouraging landlords to use regulated letting agents such as safeagent licensed firms.

Regulation of letting agents

To achieve better regulation of the private rented sector and improve consumer protection, it is important the council takes a holistic approach that extends far beyond the proposed licensing scheme.

Since October 2014, it has been a requirement for all letting agents and property managers to belong to a government-approved redress scheme. In May 2015, new legislation required agents to display all relevant fees, the redress scheme they belong to and whether they belong to a client money protection scheme. On 1 April 2019, new legislation required letting agents and property managers that hold client money to be members of a government approved client money protection scheme. At safeagent we operate one of the six government approved client money protection schemes.

To assist councils in regulating the private rented sector and effectively utilising these enforcement powers, we developed an Effective Enforcement Toolkit. Originally published in June 2016, the second edition was published in 2018. The third and most recent edition of the safeagent Effective Enforcement Toolkit, developed in conjunction with London Trading Standards, was published in 2021.

It can be downloaded free of charge from our website:

<https://safeagents.co.uk/wp-content/uploads/2021/11/safeagent-EffectiveEnforcement-Toolkit-2021.pdf>

Should you wish to discuss any aspect of this consultation response, please do not hesitate to contact me. Can you also please confirm the outcome of the consultation exercise in due course.

**Isobel Thomson Chief
Executive**

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Response 5

Hi xxx,

I would not recommend. From experience of our immediate area that is Crouch End etc, we find the properties we have for let are in good shape and are let within the guidelines. This seems more like an easy way for Haringey to make additional funds.

Kind regards

XXXX

**Castles London
Branch Manager**

Response 6

Hi There.

Can I suggest you do the inspection first and charge the same as a EPC report ie £65 and save a whole lot of money and time.

I am currently selling my 3rd BTL property putting 4 very happy tenants back onto an extremely expensive thin supplied rental market. I intend to keep selling my BTL flats when the tenants decide to move out, even though its a bad time to sell as the market is flooded with landlords flats

Mortgages have trebled.(our rents Have gone up for the first time in 25 years for existing tenants)

Taxes have doubled with the revised section 24.(not for businesses who have incorporated which is so unfair) removal of the furnished 15% allowance, putting our income into the higher 40% bracket.

All the EPC expense and worries, the section 21 removal, council licences, threats of fines, courts that take a year to remove a non paying tenant,

Dealing with all this and more for no return is not worth it I am getting out which will be a massive shame for all existing and future tenants.

So you carry on taking money for nothing because there will be nothing left to take from except made to measure soulless corporate box room flats with no outside space.

Sorry to rant but hope you take it seriously.

If there is an official complaints department can you forward this email to them please.

Kind regards XXXX

Response 7

This proposal is ludicrous.

Yet more conditions imposed on "HMOs" (most of which consist of friend groups sharing, and not the 5 bedrooms of unrelated people conjured up by the image of an HMO.) Plus a huge fee to the council.

As a result you will further inflate costs for landlords, which will ultimately be passed on to tenants.

I strongly represent that you need to reconsider the design of the scheme to make it proportionate to the objectives. You should target only "proven bad" landlords where a complaint has been upheld, and in those cases a requirement for a license is reasonable. However for good landlords, like us, who have operated in harigney for decades with no issues, this is merely yet another cost for zero tenant benefit.

Response 8

Hello,

I am against this new proposal, I have yet to see any metrics or information that has proven this scheme has been effective and justifies the effort and tax on landlords. These additional costs typically lead to higher rental costs to the residence, so this scheme should have a justification for these additional taxes in my opinion.

Kind regards

XXXXX

Response 9

My main observations are that these schemes are expensive to buy a licence for. I pride myself in being a good landlord and anything that can be done to weed out poor ones is a good thing. So far I have managed to absorb the cost of the licence so far but any further increases will need to be passed on to the tenant, which I really don't want to do.

There also seems to be confusion at the council as to what their own definition of multiple occupancy means. I feel this should be 3 or more adults living separately (sharing a house) and not include smaller flats/houses that are for couples or a single parent.

Best of luck with the research

Response 10

One comment I do have is that £ 650/750 (I can't quite remember how much) to register the property when it has already been registered means that Haringey Council are definitely making a profit on that part, despite what xxx stated in the meeting. I assume that the council breaks even on the whole scheme. But that is penalising compliant landlords against those who don't sign up and are then chased and eventually prosecuted.

I think this part of the licence fee should be a nominal £100 if already registered previously. Obviously appreciate an inspection will still be carried out, so that part of the fee needs to be paid.

Response 11

Hello. Its all very simple really, the Council embark on building enough housing to accommodate all needs for singles and families. With imaginative thinking it is certainly possible.

I have been involved in the management of Landlord and Tenant for over sixty years so, if you want any help to get going, email me, then, HMO's would no longer be necessary, they are in my view a disgrace. Young and old people have no option BUT to share with all the imposition of a loss of privacy and personal space.

Sincerely.

XXXXX

Response 12

Haringey – Proposed Additional Licensing Scheme for HMO Consultation 2023

“Have Your Say” February 2024

31st January 2024

I have been a Landlord in Haringey for over 20 years. I have always provided safe, clean and affordable housing to my tenants and have always complied with the Council's regulations. I believe I am exactly the type of landlord you wish to deal with. I've been a member of the NRLA for over 10 years, my tenants stay in my properties for many years and in some cases decades. I am prudent and conservative with my purchases and borrowing and always keep within safe limits so I can maintain

affordable rents for my tenants. I've never had to evict a tenants and indeed, the only problems I've had in the past has been when renting my property directly to Haringey Council.

I've read and re-read the Consultation and the Council has some admirable aims. However, your survey and report make it clear that you have a very high percentage of landlords that are not on your radar and are simply not complying. They are not paying the fees, doing the extra works and ignoring and flouting the Borough's landlord rules. These are the people you should be focusing on. These are the people that should be held to account and forced to bring their properties up-to-standard. Making the already good landlords pay more and do even more safety work and assessments on tenants noise and waste monitoring is a "tick-box" exercise to show how well the Council is doing, while ignoring the real issue of rogue landlords disregarding the law. The Council already has the powers of enforcement, but instead of doing the more difficult job of seeking out the bad ones, you are making the good ones do more work, pay more and in the end, force UP the rents to the already hard-up tenants. It's the rogue landlords that are making the extra money as they are not spending on improvements and repairs. Go after them! Not the good landlords who are struggling during this high interest, high red-tape era.

Here are my recommendations on how Haringey Council can help me and how we can work in partnership to provide the clean, safe and affordable housing you crave for the borough:

1. Parking

If the Council want me to do the repairs, regular inspections, safety certificates etc, then make parking for me and my tradespeople free, or at least affordable and easy to get. At the moment asking me to pay £22 for a daily permission to park permit for a gas safety engineer to do a certificate is madness. I own the property as the landlord and I should at the very least have the same access to parking as my tenants. Parking, and arranging parking for tradespeople is a massive issue. It can't be difficult to allow a landlord who owns a property to prove that is the case and have the same access rights. This is a simple change for the Council and much needed. Please help me to help you. Here's a real case example. The Council require that I fit a landlord electric meter. I contact an energy supplier to fit the meter and they give me a date. However, they can't give me the registration number of the vehicle. The energy company tell me that if I don't provide parking they will cancel the job and move-on. Get someone at the top of the Council to authorize the various departments to speak to one-another to help us to help you.

2. Tradespeople

I am being asked to carry-out on-going and additional improvements to my tenanted properties under the various HMO and Selective Licence schemes. I'm not sure the Council are aware how difficult it is to get good tradespeople to 1) be available, 2) do the work and 3) charge fair and reasonable fees. I called and asked the Council for a list of vetted and regulated tradespeople and was told I had to find them myself. Many I have called refuse to work in CPZ zones (see point 1 above), charge too much or are not available and having to pay an extra £22 per day is unaffordable. I suggest that the Council engages or employees tradespeople available to landlords to carry-out the works that the Council require me to do and makes it quick and easy to do the works.

The Council must have their own tradespeople that maintain Council serviced properties. Surely this offering can be expanded to help landlords that have signed-up to the Selective licensing scheme. We need help.

3. Affordable Housing

The Consultation report mentioned on numerous occasions that the aim of the Council is to provide “affordable housing” in the Borough. I struggle to understand how making me pay £1,000s of pounds every year in upgrades, improvements, fees, parking etc and be expected to take the hit on the extra costs so that the Council can meet its affordable housing aim? Any extra costs you make a landlord pay will eventually be passed on to the tenants making rents “less affordable”. The exact opposite of the Council’s aim! The council should be providing grants, free parking, subsidized tradespeople etc to HELP landlords achieve the Council’s aim. Does the Council really think it can charge landlords more and expect rents to stay the same? In the past year interest rates have jumped from 0.1% to 5.25%. My own mortgages have seen a many multiple percent increase in payments. Many landlords are selling up. Many others simply can’t afford all the Council’s extra licencing/HMO fees and cost of repairs so are staying below the Council’s radar. This passes on the burden to the likes of me. This situation is NOT sustainable

4. Enforcement

This appears to me to be the solution. Your report makes it very clear that there is a very high percentage of rented properties in the borough that are not adhering to the HMO/Selective licencing regime. The Council has the powers to impose the large fines, but instead are coming after the landlords that are trying to help the Council to provide the rented homes it needs. Your conclusion implies that the Council can’t do much about the rogue landlords, so let’s hit the good landlords so at least their properties are clean, safe and affordable. Surely, it can’t be hard to locate and trackdown the landlords that have not registered? I believe it’s through laziness and going after the easy target that you are ignoring the bad landlords. Here’s my simple suggestion. Rather than making the Licencing scheme even stricter, more complicated and harder to adhere to, move some of the staff on to finding and fining the rogue landlords. Here’s how – a) check all rental adverts in Haringey against the Register b) walk around the borough and check doorbells, dustbins and signs of tenants and check against the Register c) Speak to letting agents and get them to reveal their landlords d) check the owners of properties on Land registry against the Register e) check social media and signs in shop windows for letting adverts and check against the Register. I understand that this is time consuming, but if the Council can fine each rogue landlord £30,000 for non-compliance, then 1-2 successes would pay the annual salary of a Council worker to do this job.

5. Extension to the Scheme

As per my arguments above, the scheme has gone far enough and does not need to be extended or made stricter. Enough is enough for landlords. We can’t provide the affordable housing if the landlord’s costs keep going up. Enough is enough!

6. Threat of fines

Rather than threatening large fees on the good landlords, if the Council genuinely want to achieve their aims, then HELP ME. Don’t harass and threaten me. I’m on your side, but I don’t get any help in return. The relationship should be a partnership. You need us.

7. Council Housing

This is not a “political” response to the Consultation but I think the Council should look at their own standards and provision for affordable housing. It’s an established fact that there isn’t enough

Council Housing and Haringey are too slow to address this. I mentioned above that I once gave my property to the Council for its tenants. This is an experience I will never go through again. The property was returned to me in a shocking condition and took me many months to repair and at a huge cost to me. All this at a below market rent, just to get a guaranteed rent for 3 years. It simply wasn't worth it. If the Council led the way with high class service, maintenance, property management then more landlords would come forward to let their properties via the Council.

In conclusion, ask yourselves this, how can we HELP landlords in the borough achieve our aim? Not make punitive adjustments to a scheme that is already failing to locate the rogue landlords. If we worked in partnership and collaborated, this will go some way to easing the housing crisis the Council is currently facing.

Yours faithfully, XXXX

Response 13

Dear Sir/Madam

I am a professional landlord providing good quality and affordable housing to my tenants some of whom have been with me for 20 years or so. I have over 10 tenants that I look after. Rent increases have been kept to a minimum over the 20 years, all of my tenants are in fact paying well below the market rent. Whilst I am a professional landlord carrying on a business, it is important to me to have people in my properties who look after them. I look after my tenants and in return, they look after my properties. I am a member of NRLA and SAL, attend many webinars and keep myself up to date with all landlord updates/changes/regulations.

I have read the Consultation and the Council's aims but what is constantly ignored/not dealt with is that you have and will continue to have a large proportion of landlords who are still not on your radar and are simply not complying with any regulations/licences you introduce and it is these landlords that provide the unsafe/overcrowded properties. Extending the licensing scheme will not change that. Rogue/unprofessional landlords simply continue to disregard all rules/regulations/laws you impose and simply get away with it. These are the people you should be targeting. Introducing further licenses/extending licensing, introducing more red tape makes it more difficult for compliant, hardworking landlords like myself to continue providing affordable housing and all it does is cause hardship to tenants like mine as I am forced to pass on these costs to the tenants who are struggling financially to make ends meet already.

Driving and Parking in Haringey is an absolute nightmare and truly expensive. I have to take detours to get to my properties because of road closures/LTNs, increased traffic and the 20 mph zone and when I eventually do manage to get to my property, I cannot park. I have no idea how I would get to my tenants should there be a real emergency situation. I need to ask my tenants to get a parking permit for me online and then again ask for my tenants help for parking permits for all the tradesmen that I need to bring to the house should a problem arise. A great many tradesmen are now refusing to do work in the Haringey area because of these issues and tenants are sometimes unable/unwilling to help especially if for example a booking has to be changed online because a tradesperson changes their appointment day/time or they don't know what vehicle they are bringing so I don't have the registration number.

You should be looking to help landlords not making their job harder - allow landlords direct access to parking and reduce the cost for both landlords and tradespeople.

The Council should vet and produce a registered list of tradespeople for landlords to use. There is a shortage of electricians, plumbers, builders, etc surely you are aware of that? Who repairs the Council run properties? Surely those trades could be outsourced to help landlord who have selective licences do their repairs.

Rogue landlords do not have these issues, you are unable to identify who they are or take any enforcement action. You are targeting and are only able to enforce against the compliant landlords who you know about. Threatening me with fines is not the answer. I provide a very important service, good housing at a reasonable rent and without landlords like me, Haringey would have an even larger housing crisis on their hands. Extending the scheme is not the answer. You should be working with other departments within the Council such as Housing Benefit, Council Tax, Parking etc to see whether a property is tenanted. Do checks with the Land Registry go knock on the doors and find those rogue landlords, speak to neighbours - don't just make life harder for the easy targets like myself.

Yours faithfully, XXXX