



Oxford City Council

Consultation on Selective and Additional HMO Licensing in the Private Rented Sector in Oxford

Executive Summary



**OXFORD
CITY
COUNCIL**

**Opinion Research Services
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Executive Summary by Opinion Research Services

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Executive Summary

The commission

- 1.1 Oxford City Council (henceforth OCC or “the Council”) undertook a public consultation, seeking the views of landlords and letting agents, tenants and other residents, and other stakeholders about:
 - » The reintroduction of additional HMO licensing when the current scheme ends; and
 - » The introduction of selective licensing in Oxford.
- 1.2 Specifically, the Council consulted on a proposal to introduce a new additional HMO licensing scheme in 2021, following the expiration of the current scheme in January 2021, and the introduction for the first time of selective licensing of non-HMO private rented properties. As well as seeking views on the principle of a new scheme, and the possible designations and areas which might be covered, OCC requested feedback on other more detailed aspects of the proposed new schemes, such as fee levels and licence conditions.
- 1.3 Opinion Research Services (ORS), a spin-out company from Swansea University with a UK-wide reputation for social research and major statutory consultations, was appointed by OCC to advise on and independently manage and report the consultation programme.

The consultation

- 1.4 A formal consultation period of just over 12 weeks was originally planned to run from 10th September 2020 until 3rd December 2020. In light of the second national lockdown in November 2020, due to the ongoing COVID-19 pandemic, the Council made the decision to extend the consultation period for a further 4 weeks until 31st December 2020, bringing the total consultation period to just over 16 weeks.
- 1.5 During this period, landlords and agents, tenants and other residents, and other stakeholders were invited to provide feedback through the following channels and activities:
 - » A consultation questionnaire, which was ‘open’ and therefore available for any interested party to complete. This attracted 1,987 responses;
 - » Four virtual ‘deliberative’ events for landlords and letting and managing agents, undertaken via videoconference (Zoom) in light of social distancing guidance introduced by the UK Government, for which around more than 220 places were reserved, and a maximum of 148 participants attended;
 - » A deliberative virtual focus group for 10 local tenants and other residents recruited from across the city;
 - » 53 letters or email submissions from stakeholders who chose to provide their views in writing to OCC or ORS; and
 - » In-depth interviews undertaken by ORS with representatives of 11 stakeholder organisations.

Nature of consultation

- 1.6 The key good practice requirements for consultation programmes are that they should:
- » Be conducted at a formative stage, before decisions are taken;
 - » Allow sufficient time for people to participate and respond;
 - » Provide the public and stakeholders with enough background information to allow them to consider the issues and any proposals intelligently and critically; and
 - » Be properly taken into consideration before decisions are finally taken.

Accountability

- 1.7 The principle of accountability requires public bodies to give an account of their plans and take into account public views: the consultor (i.e., Oxford City Council) should conduct fair and accessible engagement while reporting the outcomes openly and considering them fully.
- 1.8 This does not mean, however, that the ‘majority’ views automatically decide public policy; and the popularity or unpopularity of draft proposals does not displace professional and political judgement about the final decision in the circumstances. The levels of, and reasons for, public support or opposition are highly important as considerations to be taken into account, rather than as factors that determine authorities’ decisions outright. Above all, public bodies must give due consideration to the relevance and cogency of the arguments put forward during public engagement processes, rather than ‘count heads’.
- 1.9 ORS does not endorse any opinions in this report; we seek only to portray the feedback received through consultation clearly and accurately. ORS offers guidance on the consultation methodology and its interpretation, and we seek to profile the opinions and arguments of those who have responded. We do not, however, make recommendations on the decisions to be taken by OCC.
- 1.10 Each chapter in this report contains detailed analysis and reporting of feedback received through all consultation channels. For the remainder of this Executive Summary, ORS has brought together the main findings from all strands of the consultation into headlines and a thematic summary. We have sought to ensure that the summary below represents a thorough overview of the entirety of the consultation feedback; nonetheless, we also recommend strongly that it be read in conjunction with the main body of the report.

Main findings

Quantitative feedback overview

- 1.11 The ‘open’ consultation questionnaire was designed for anyone with an interest in the proposals to take part of their own volition. It should be noted that respondents to open questionnaires are typically more motivated to take part in public consultations than average citizens, often with stronger and sometimes polarised views on the issues or proposals in question. ORS therefore typically reports the views of distinct stakeholder types participating in the open questionnaire separately, to avoid the views of the group providing the largest proportion of responses (landlords and letting and management agents in this case, with 54% of the responses) simply dominating the overall findings. Furthermore, this approach helps to identify and understand any key differences in the points of view of different stakeholder types.

Questionnaire respondents' views on proposals for a new additional HMO licensing scheme

- 1.12 Landlords and letting or managing agents, and representatives of local businesses, were generally less likely than other stakeholder types to agree with the principle or practice of landlord licensing in the private rented sector (PRS) in Oxford. 45% of landlords, 50% of agents, and 42% of those who own or manage businesses agreed that the current additional HMO licensing scheme - ending in January 2021 - had been effective. By comparison, 71% of those responding from an organisation and 64% of Oxford residents and other respondents felt that additional HMO licensing had been effective in addressing issues in the PRS in Oxford.
- 1.13 Landlords' and agents' views on the proposal to introduce a new additional HMO licensing scheme when the current one ends were divided. Almost half of landlords (49%) and more than two fifths of agents (44%) agreed with the proposal to continue with additional HMO licensing in Oxford, compared to 35% and 45% respectively who disagreed. Approximately half of business owners or managers who responded agreed with this proposal, as well as outright majorities of organisation representatives (76%) and residents and other respondents (72%).

Questionnaire respondents' views on proposed additional HMO licensing fees and conditions

- 1.14 In general, landlords, agents and respondents from businesses tended to feel the proposed additional licence fees were 'too high', while organisation representatives and residents and other respondents tended to find them more acceptable (albeit there were sometimes substantial minorities within the organisation and resident groups who felt certain fees were 'too high' or 'too low'). Landlords and agents had strong reservations about the standard one-year fees in particular, with large majorities feeling they were 'too high'. On the other hand, many agents and landlords (43% and 44% respectively) felt the proposed £413 five-year renewal fee was 'about right', even if slightly higher proportions (53% and 48%) felt it was 'too high'.
- 1.15 A little under half of letting and managing agents (47%) and a slightly lower proportion of landlords (44%) agreed in general with the proposed additional licence conditions, while around half of those who own or manage a business agreed. The proposed conditions were widely supported by organisations (77%) and by residents and other respondents (73%).

Questionnaire respondents' views on proposals for a new selective licensing scheme

- 1.16 In relation to proposals to introduce a new selective licensing scheme, around a third of landlords (35%) and agents (31%) agreed with the principle of doing so. Other stakeholders responding to the questionnaire viewed the prospect more favourably, with just over half of local business owners and managers (54%), nearly three quarters of organisation representatives (73%) and over two thirds of residents and other respondents (68%) in favour.
- 1.17 Regarding options for selective licensing designations, the difference in the balance of views of different stakeholder types was pronounced. Around a third of private landlords (34%) and just over a quarter of agents (27%) agreed with the Council's *preferred option* for a selective licensing scheme covering the whole of Oxford. Therefore, most landlords and agents did not agree with the Council's preferred option.
- 1.18 If a selective licensing scheme were to be introduced, however, more landlords and agents would prefer a scheme covering the whole of the city than one covering only 23 out of 24 wards (i.e., excluding Holywell). Many indicated they would prefer some sort of alternative, and suggested possibilities ranging from much more focussed approaches to no licensing at all.

- 1.19 Around half of business representatives (51%) agreed with the Council’s preferred option for a selective scheme covering the whole city, and this was supported by a majority of organisation representatives (71% agreeing) and residents and other respondents (68% agreeing). There was also a widespread view among these groups that if a selective scheme was to be introduced, then a citywide scheme would be preferable to one covering 23 of the 24 wards, or to some other alternative.

Questionnaire respondents’ views on proposed selective licensing fees and conditions

- 1.20 As with the proposed additional HMO licensing fees, landlords, agents and (to some extent) local business representatives were generally more likely to feel the proposed selective licence fees were ‘too high’ than respondents in the remaining stakeholder groups, who tended to find them more reasonable. There was a spread of views, however, with many in these remaining stakeholder groups holding the view that some of the fees were either ‘too high’ or ‘too low’).
- 1.21 In relation to the various proposed discounts: most respondents agreed with the principle of applying an Early Bird discount, a discount for accreditation, and a discount in instances where the applicant is a registered charity providing accommodation through the homeless pathway (in particular, the latter of these was also widely supported by respondents who identified as residents or organisation representatives, as well as other non-specified respondents).
- 1.22 There was somewhat less consensus around the principle of applying discounts for new build properties, ‘block discounts’ for multiple flats in a single landlord-owned building, or where the property is part of Home Choice. More landlords and agents agreed with these discounts than disagreed, whereas those respondents residing in Oxford or with an ‘other’ connection to the borough were less prone to agreeing. Further details and breakdown of respondent’s views on proposed discounts are presented in chapter 3 of this report.
- 1.23 In general, there was fairly widespread support among questionnaire respondents for the principle of issuing one-year licences in instances where the Council has concerns about the management of the property: most landlords (66%) and around half of agents (51%) and businesses (54%) agreed, along with large majorities among organisation representatives (81%) and residents and other respondents (76%).
- 1.24 Views on the fees for shorter licences were more mixed among landlords and agents; many felt the proposed fees were ‘too high’, although sizeable minorities of both landlords and agents felt the proposed fees were ‘about right’. The majority of organisations representatives and residents agreed that the Council’s proposed one-year licence fees were ‘about right’.
- 1.25 Finally, views on the proposed selective licence conditions varied - just under two fifths of landlords (38%) and agents (39%) who responded to the questionnaire agreed with the proposed selective licence conditions, whereas half or more disagreed. Around half of business owners or managers agreed, as did the majority of organisations (77%) and residents and other respondents (71%).

Qualitative feedback overview

- 1.26 ‘Qualitative’ consultation strands include written submissions and facilitated discussions, and often enable exploration of the *reasoning* behind the views being shared. The latter, more discursive approach is particularly valuable in that it allows diverse views within different stakeholder groups to be explored. It is therefore difficult to provide an overall balance of opinion arising each separate qualitative research strand; nonetheless, the follow short section aims to summarise views from each strand around the same key questions as for the questionnaire responses above. The feedback received is then covered in detail in each chapter of the main body of ORS’ report, as well as being incorporated into the thematic summary below.

Written submissions

- 1.27 Feedback received in letters or via email was diverse and often strongly polarised. It is therefore not appropriate to attempt to synthesise any overall views. The opinions and concerns raised in written submissions is, however, incorporated into the thematic summary below and covered extensively in the main body of the full report.

Landlords and agents' forums

- 1.28 It was generally the case - based on their feedback - that most landlords who took part in the forums did not own HMOs. Many, therefore, did not have direct experience of landlord licensing to date, perhaps indicative of the fact that the possible introduction of selective licensing for the first time garnered the most interest, as well as that there are many more non-HMO than HMO properties in the city. Letting agents were more knowledgeable on this topic; nonetheless, this meant that a considerable number of attendees stated that they did not feel able to give an informed view of either the current HMO licensing scheme or the proposals.
- 1.29 Of those who did express a view, a few forum attendees spoke out in favour of the current additional HMO licensing scheme; many others, however, were critical of the way it has been managed and enforced by the Council. Feedback on the Council's proposal for a new additional HMO licensing scheme tended to align with these views; while some attendees objected outright to a new scheme, concerns and criticism tended to focus on its likely effectiveness and concerns about how it might work, rather than on whether it should or should not be introduced.
- 1.30 Similarly, some attendees supported proposals for a new selective licensing scheme in Oxford as a way to regulate the PRS and improve standards; these views were outweighed, however, by objections which frequently cited concerns about the 'unfairness' of a scheme that would result in 'a burden of cost and additional responsibility for compliant landlords', while failing to address problems in the PRS related to poor or 'rogue' landlords. If, however, a new selective licensing scheme was to be introduced, the majority view among attendees was that a city-wide scheme would be fairer and more consistent.
- 1.31 Attendees' views on the proposed fees and discounts for both additional HMO and selective licenses varied, from some who felt that they were reasonable to others who felt that they were punitive and, in the case of the discounts, simply too complex. Finally, the proposed licence conditions were viewed as appropriate by many, with the caveat that some conditions simply related to things that responsible landlords and their agents already do. Concerns about conditions related to inspections by landlords, and their responsibilities around anti-social behaviour (ASB) on the part of private tenants were raised by many attendees.

Tenants and other residents' focus group

- 1.32 Tenants and other residents involved in the focus groups recognised the issues with property conditions and PRS management cited by OCC, and the overwhelming majority agreed with the Council's proposals for both additional and selective licensing schemes, as well as that the proposed licensing fees and discounts and licence conditions were appropriate and reasonable.

Stakeholder interviews

- 1.33 Among stakeholder interviewees, there was firm support for the proposed schemes in some quarters, particularly from tenants' groups and statutory bodies. Some stakeholders, however, heavily criticised them, highlighting what they considered a failure to recognise the contribution made by accreditation bodies to the

PRS. It was suggested that this contribution should be recognised through discounted fees for their accredited members.

- 1.34 There was considerable agreement that both proposed schemes should be city-wide; there was felt to be little merit in excluding Holywell from a new selective licensing scheme. Overall, interviewees tended to accept the proposed fees and conditions as reasonable, although several raised concerns about conditions related to ASB on the part of tenants.

Thematic summary of feedback across all consultation strands

There was broad recognition across the consultation strands that there are problems in the PRS in Oxford that need to be addressed

- 1.35 While views on the best approach to dealing with issues in the PRS were mixed, there was recognition across all consultation strands and stakeholder groups that those issues exist. Those mentioned included, among others:

- » Rapid growth of the PRS, driven by high levels of demand, which in turn has led to high rental prices and more incidences of lower quality accommodation;
- » Problems with poor property conditions and poor tenancy management, not least as a result of unscrupulous or ‘rogue’ landlords who deliberately flout regulations, as well as ‘amateurs’ with one or two properties who are not necessarily aware of their responsibilities in these areas; and
- » Issues such as poor waste management, fly-tipping and anti-social behaviour linked to PRS properties as well as other parts of the housing sector.

Views on the principle of landlord licensing as a tool with which to address these and other issues were mixed and, at times, strongly polarised

- 1.36 In some quarters there was acceptance and outright support for licensing in general, and the Council’s proposals in particular. This tended to hinge on the view that there are serious issues in the PRS in Oxford that require addressing, and that licensing of private landlords or other responsible persons is an appropriate, albeit imperfect, tool with which to improve standards in the sector.
- 1.37 Support for landlord licensing in general tended to be strongest among tenants and other residents, and the organisations representing their interests, as well as from a local district council and bodies with statutory responsibilities in the housing sector (the emergency services and Trading Standards, for example). There was also support for the principle of landlord licensing from some organisations representing landlords and agents, although this tended to be caveated on the basis that such schemes require careful design and operation to be successful.
- 1.38 Among individual landlords and agents, as well as representatives of local businesses, views on the principle and practice of landlord licensing were mixed and, overall, more negative than was the case with other stakeholders. For those who did accept licensing as necessary or even desirable, the key factors tended to relate to its aim of improving standards of properties and practices in the PRS.
- 1.39 Many landlords and agents, however, were opposed to licensing schemes in general, citing what they viewed as unnecessary bureaucracy and cost, lack of focus, poor enforcement, and a perceived lack of effectiveness in dealing with the issues they are designed to address. In particular, there was a pervading view that landlord licensing tends to ‘penalise’ compliant landlords while others continue operating ‘under the radar’.

Across all consultation strands and stakeholder types, there was more agreement than disagreement that the current HMO licensing scheme has been effective; although landlords, agents and representatives of local businesses were more likely to disagree compared to other stakeholders

^{1.40} The overall balance of opinion was that the current additional HMO licensing scheme had been effective in improving the quality and management of HMOs in Oxford, but there were dissenting voices. Those who expressed positive views on the current scheme cited, among other points:

- » The need to protect tenants and ensure that landlords fulfil their obligations in respect of upkeep of properties and good management practices;
- » Robust inspection and enforcement action being required to pursue poor and rogue landlords and enforce compliance; and
- » The importance of collaboration between landlords, agents and the Council to raise standards in the private rented sector overall.

^{1.41} There was, however, strong criticism of the current additional HMO licensing scheme from many landlords and agents, as well as concerns about its effectiveness among other stakeholders - including some of those who generally supported the scheme. Issues raised included, among others:

- » Continuing issues with non-compliance, even though the scheme has been in place for ten years;
- » Ineffective inspection and enforcement which, it was felt, has resulted in punitive actions against 'good' landlords, while criminals and rogue landlords continue to operate with impunity;
- » Burdensome costs and bureaucracy being imposed on compliant landlords, with little or no 'reward' and scant evidence of improvements in the PRS as a result;
- » Inefficiency in the processing of applications and delays in issuing licences; and
- » A failure to address other problems in the housing sector (e.g., social housing, short lets via Airbnb or similar services) or to offer support or protection to landlords faced with challenges ranging from problem tenants to the practical and financial impacts of COVID-19.

The Council's proposal to introduce a new additional HMO licensing scheme was strongly supported by some groups of stakeholders, particularly tenants and residents and those organisations representing them; however, strong concern and some outright opposition was expressed by many landlords and agents, and some other stakeholders

^{1.42} The reasons given by respondents to the consultation for agreeing or disagreeing with the Council's proposal for a new additional HMO licensing tended to align with their views on the current scheme (summarised above). Those who viewed the current scheme as effective, for example, tended to support proposals for a new one. Some also cited the need for regulation and enforcement, including a dedicated resource within the Council to address issues in the PRS.

^{1.43} Opponents, on the other hand, decried additional HMO licensing as unnecessary and ineffective; some pointed again to the perceived poor performance of the inspection and enforcement teams, as well as the continued issues with non-compliance. Others questioned the evidence put forward by the Council or argued that licensing is simply a money-making exercise or an exercise in laying the blame and responsibility for wider social problems at the feet of landlords.

1.44 Alternatives to licensing, or changes to the proposed scheme, were suggested by some respondents and are summarised below alongside similar comments around selective licensing.

The Council's proposal to introduce a selective licensing scheme in Oxford for the first time generated considerable feedback - particularly from landlords - with views of the different stakeholder groups tending to run along similar lines to those on additional HMO licensing

1.45 In general, tenants and other residents who engaged with the consultation tended to agree with OCC's proposals for the introduction of a selective licensing scheme in Oxford, as did those organisations working on their behalf, representatives of emergency services, and other public sector stakeholders. The principal reasons for support aligned with those given in relation to additional HMO licensing - primarily the need for regulation and improvement of standards in the sector, and agreement that licensing is an appropriate tool to achieve this goal.

1.46 Landlords and agents tended to be much more negative about the possibility of introducing selective licensing, though not universally so, while the views of responding business managers and owners were fairly evenly split.

1.47 Those who disagreed with the introduction of selective licensing cited similar issues to those who opposed a new additional licensing scheme, for example that:

- » The scheme would be ineffective, particularly in light of what was viewed by many opponents as the failure of additional HMO licensing to raise standards, and that the Council would be unable to manage and enforce a scheme that would include many more properties; and
- » Selective licensing is unfair to landlords, placing an unwarranted burden of responsibility, cost and administration on the very people who are trying to provide accommodation to those who need it while failing to tackle the 'real' issues in the housing sector.

1.48 Questions were raised, particularly at the landlords' forums, about the accuracy and validity of the evidence used by the Council to 'justify' their proposals. Furthermore, those who disagreed with the Council's proposal, and some of those who were more positive, also raised concerns that:

- » Introducing a scheme might actively discourage investment in rental properties and drive good landlords to leave the PRS or move to unlicensed areas;
- » Costs related to license fees and any expenses related to work required to make properties compliant would be passed on to tenants, leading to rent increases;
- » Licence fees represent a 'tax' on landlords, or that selective licensing is simply a 'money-making scheme for OCC which - despite assurances regarding ring-fencing - would be spent elsewhere; and
- » There is sufficient legislation already in place related to privately rented properties, the proper enforcement of which would negate the need for additional regulation.

The Council's preferred option of a city-wide selective licensing scheme was the most widely supported of the two proposed designations by tenants and residents, organisations, local businesses, and other stakeholders...

1.49 Support for city-wide selective licensing was predicated principally on the basis that it would be fairer and more consistent, and allow the Council to raise more money, thus ensuring that issues related to sub-standard accommodation would be addressed across the whole of Oxford.

...but individual landlords' and agents' views differed considerably, with the majority fundamentally disagreeing with selective licensing, and any options associated with it, and many suggesting other approaches

- 1.50 Most landlords and agents responding to the consultation or participating in events did not agree with the Council's preferred option for a selective licensing scheme covering the whole city, although - if a new scheme was to be introduced - more would prefer a scheme covering all of Oxford than one covering only 23 out of 24 wards (i.e., excluding Holywell).
- 1.51 The majority view among landlords and agents was that an alternative approach - which for many was simply the outright rejection of selective licensing - was preferable. Common examples of alternative approaches suggested by landlords and some other stakeholders included:
- » Improved collaboration between the Council, landlords, lettings agents, Police, the Fire and Rescue Service (FRS), and others to improve standards;
 - » Better utilisation of existing powers and legislation;
 - » Education of landlords, and possibly agents and tenants, about their responsibilities and the standards expected of them;
 - » Targeting specific landlords, geographic areas, property types etc. in a more focused scheme;
 - » Co-regulation with organisations that advise or accredit landlords and agents;
 - » A voluntary agreement or self-certification scheme, backed up by random inspections; and
 - » A scheme or schemes which also address social housing and university owned or managed accommodation.

Views on the proposed fees for both additional and selective licenses tended to be split along the lines of stakeholder types, with landlords and agents being more critical of them, and other stakeholder types - in general - being more likely to view them as appropriate

- 1.52 The proposed fees for standard one-year additional HMO licences tended to be viewed as too expensive by landlords and agents responding across all consultation strands, as well as by local business owners and managers. However, the longer five-year licence renewals, while also seen as too high by many in the same groups, were viewed somewhat more favourably by a substantial minority of landlords and agents.
- 1.53 Other respondent types tended to find the proposed additional licence fees acceptable (albeit there was sometimes a broad spread of views within these groups, from the fees being too high to too low).
- 1.54 Regarding the proposed standard selective licensing fees, landlords and agents, as well as some local businesses, tended to view them as too high; by contrast, other stakeholders - particularly tenants and residents - tended to think they were 'about right'.
- 1.55 The principle of one-year selective licences, where there are concerns about the management of properties, gained broad agreement across all stakeholder types; views differed on the associated fees, however, with landlords and agents again more likely to view them as 'too high'.

Generally, the proposed conditional discounts and exemptions for some selective licences were viewed positively by consultees, although some specific discounts raised concerns from residents in particular

- 1.56 Discounted selective licence fees for early-bird applications, accredited landlords, and registered charities drew support from across all stakeholder types and consultation strands. Discounts for newly built properties and for multiple flats in a single block received more agreement than disagreement from landlords and agents, but only minority support from other stakeholder groups.
- 1.57 The ‘fairness’ of licence holders being required to pay the applicable full selective license fee when applying part-way through a five-year licensing period was the cause of considerable debate and, in some cases, anger from landlords. There were calls for pro-rata fees, as well as refunds or transferable licences in cases where properties might be sold or transferred during a licensing period. Allowing licence holders to spread the cost of fees through monthly payments was also suggested.
- 1.58 An issue frequently raised by landlords and agents, and occasionally tenants and residents, was that a new selective licensing scheme would lead to rent increases as a result of landlords passing on licence fee costs to tenants, as well those associated with any work required to meet expected standards.

Proposed conditions for both additional and selective licences were generally agreed to be reasonable, although landlords were more negative and criticised what they viewed as a lack of detail in the proposals, and voiced strong concern about the inclusion of certain conditions

- 1.59 Overall, the proposed licence conditions for both schemes were viewed as reasonable by consultees. Where there were concerns or disagreement expressed, these were most commonly related to the conditions around anti-social behaviour (with landlords disagreeing that they should be held responsible for their tenants’ behaviour, and one community organisation suggesting it might be used against tenants), waste management, and mandated six-monthly property inspections by landlords.
- 1.60 The impact of COVID-19 on the ability of landlords and agents to visit properties, as well as on their income and ability to remove problem tenants or those not paying their rent, were also raised as concerns by landlord, agents, and their representatives.

Other comments made in response to the consultation included suggestions for amendments to the proposals, alternative approaches to improving property and tenancy management, concerns about potential equalities impacts, and criticism of the consultation process itself

- 1.61 Consultees - particularly landlords and agents - suggested changes to the proposed licensing scheme or alternative approaches. These included, among others:
- » A voluntary or self-certification scheme, or exemptions or free licenses for accredited landlords, those using agents to manage their properties, and those with a very small number of properties;
 - » A more targeted scheme focusing on, variously: problem landlords, poor or ‘high-risk’ properties, or areas with known problems;
 - » Licences for landlords, rather than individual properties;
 - » A more ‘collaborative’ approach to improving property conditions and tenancy management, with strong calls for improved communication between the Council and landlords, and more support for

landlords in key areas related to, for example, ASB and criminality, and overcrowding and illegal subletting in neighbouring or nearby properties;

- » Incentives or support for landlords who invest in improving their properties; and
- » Ensuring that issues related to social housing are robustly addressed, and that appropriate investment in affordable and social housing takes place.

^{1.62} Concerns were raised by one organisation about the possible impacts of ASB-related licence conditions on certain protected characteristics or vulnerable groups who might be targeted for eviction as a result, including: transgender people, those with mental health needs, sex workers, and people living in poverty.

^{1.63} Finally, some landlords and agents were critical of the consultation process itself, most commonly citing:

- » Issues with the quality and quantity of the evidence presented by the Council to justify the introduction or continuation of licensing schemes;
- » The principle of proposing to introduce new licensing schemes, or running a consultation, during the ongoing COVID-19 pandemic;
- » The length of the consultation period, which some viewed as too short, the perception that landlords had not been notified of the consultation soon enough, and the timing of landlords' forums and availability of spaces;
- » That the Council has already made up its mind and that the consultation was a pointless 'box-ticking' exercise; and
- » A perception of bias in favour of the schemes in the consultation documentation, questionnaire design and - in a small number of instances - in the presentation and facilitation of the landlords' forum

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