

Proposals for an Additional Houses in Multiple Occupation (HMO) Licensing Scheme

Consultation report and findings June 2021

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**THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA**

Introduction

Background

The Council sought views on proposals to introduce a borough wide additional Houses in Multiple Occupation (HMO) licensing scheme. These are often shared homes, including house and flat shares, bedsits and some buildings converted into flats. The Council is keen to:

- Ensure safe, well managed and healthy homes for tenants living in the private rented sector, and in particular for those living in HMOs.
- Aims to work with landlords to drive up compliance and professionalism, delivering a 'light touch' licensing scheme, whilst using the full range of legal powers against those who choose not to respond to formal approaches.

Methodology and Report

- The consultation was developed with colleagues from the Private Sector Housing Team and lasted for 12 weeks, closing on 21 June 2021.
- 104 online submissions were received and 21 responses directly into the Private Sector Housing Team. All survey and email responses have been considered as part of this consultation.
- The largest proportion of respondents were either owner occupiers 35 per cent or landlords 20 per cent. A total of 13 per cent or responses were from tenants and tenant organisations. 18 per cent were other groups including neighbouring local authorities, the London Fire Brigade and the Police service. See page four.
- For analysis purposes, any multi-option questions which have Strongly Agree, Agree, Strongly Disagree and Disagree as options, have been combined to create: Agree (Strongly Agree + Agree); and Disagree (Strongly Disagree + Disagree). These will be outlined where appropriate throughout the report. Where graphs are shown, percentages are used.
- The survey included a number of open questions for respondents to give their views, in some cases respondents have given similar feedback across multiple open comments. A sample of comments has been included in this report, and further details of all themed comments made by respondents in relation to the consultation are available upon request.

Promoting the consultation exercise

The consultation was promoted throughout the consultation period via :

- Targeted emails and letters to over 600 stakeholders including tenancy organisations, landlord, letting/managing agents, neighbouring councils and others working in the field.
- Council communication channels, such as e-newsletters and social media.
- A media release at the commencement of consultation.
- Advertisement with a number of national and London landlord professional / trade organisations.
- Direct contact with stakeholders by officers working in the Private Rented Sector.



Introduction (continued)

Equalities

Equalities data is presented on the 'About Respondents: Demographic Breakdown' section.

Acknowledgements

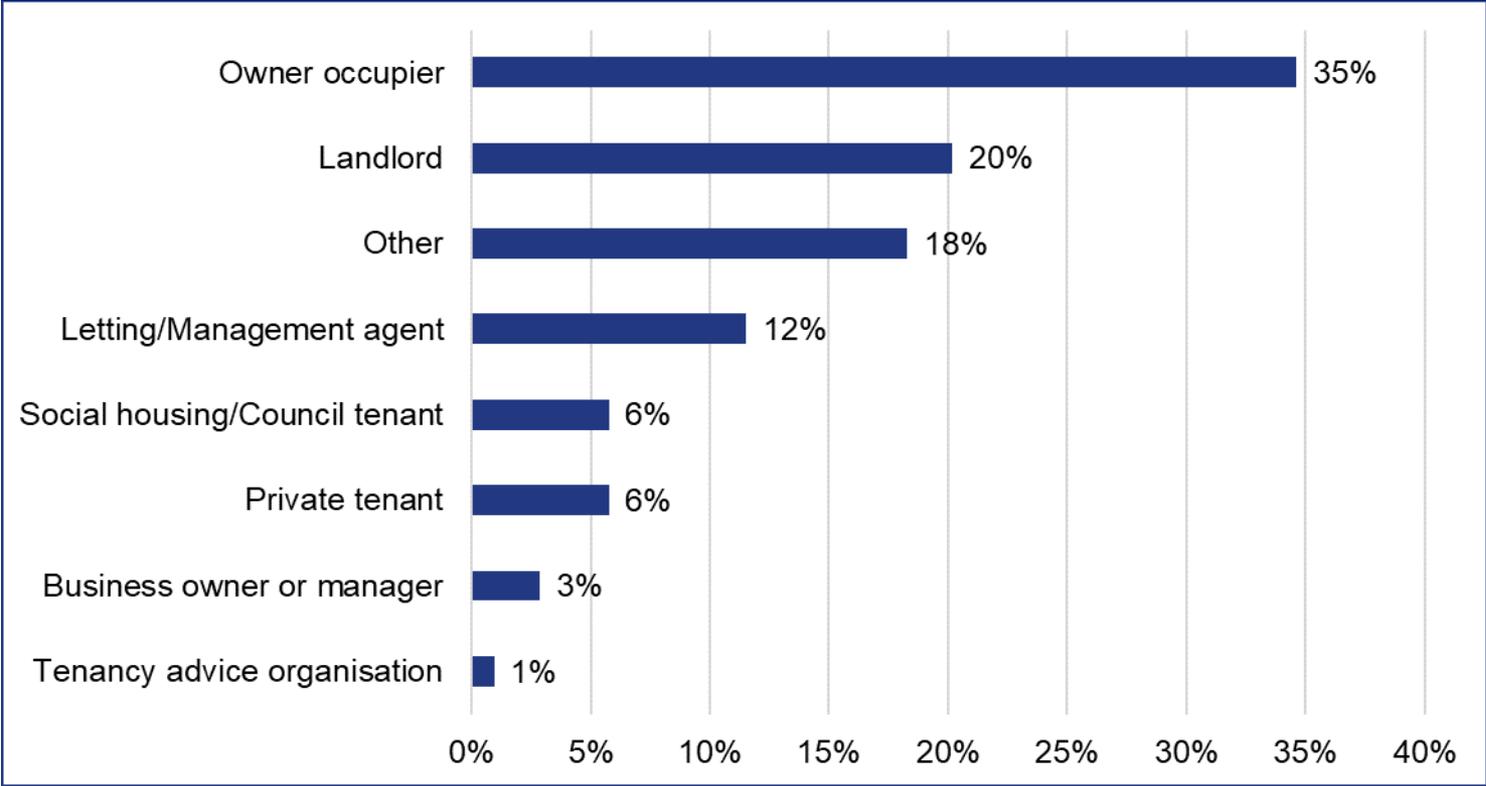
The Council would like to thank all respondents and organisations that took the time to take part in the exercise and gave their views.



Survey findings – Capacity in which responding to survey

Respondents were asked to outline in which capacity they were responding to the survey in:

- Just over a third (35 per cent) of respondents were **'Owner occupiers'** whilst a fifth (20 per cent) were **'Landlords'**
- A total of 12 per cent of respondents were a **'Letting management/agent'**
- A total of six per cent of respondents were a **'Social housing/Council tenant'** and six per cent were **'private tenants'**.

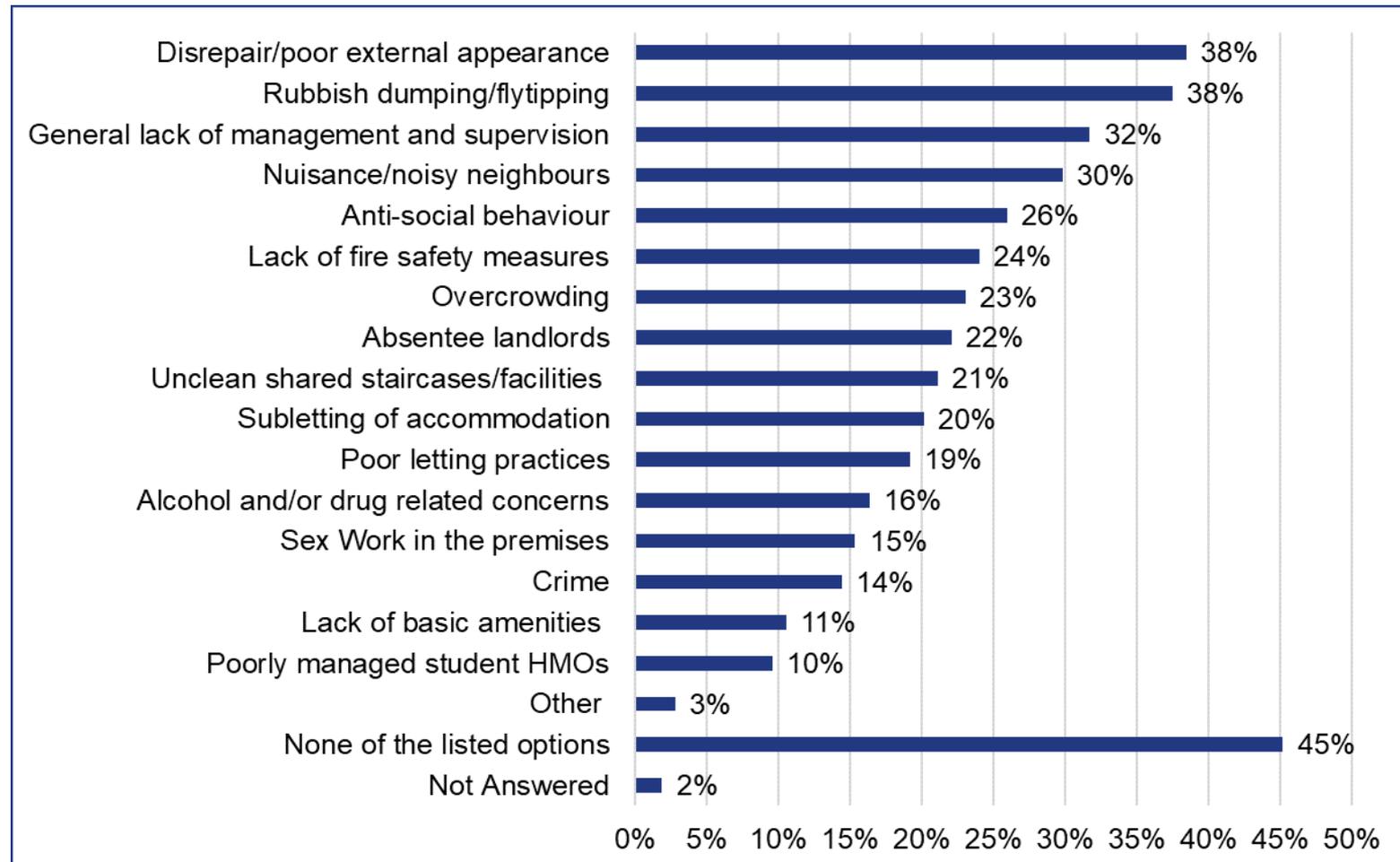


Base: 104 (all responses)

Survey findings – Experiences in HMOs

Respondents were asked to identify which issues they had seen, or experienced, in HMOs in Kensington and Chelsea: A total of 38 per cent of respondents selected ***'Disrepair/poor external appearance'*** and ***'Rubbish dumping/fly tipping'***

Just under a third (32 per cent) cited ***'General lack of management and supervision'***

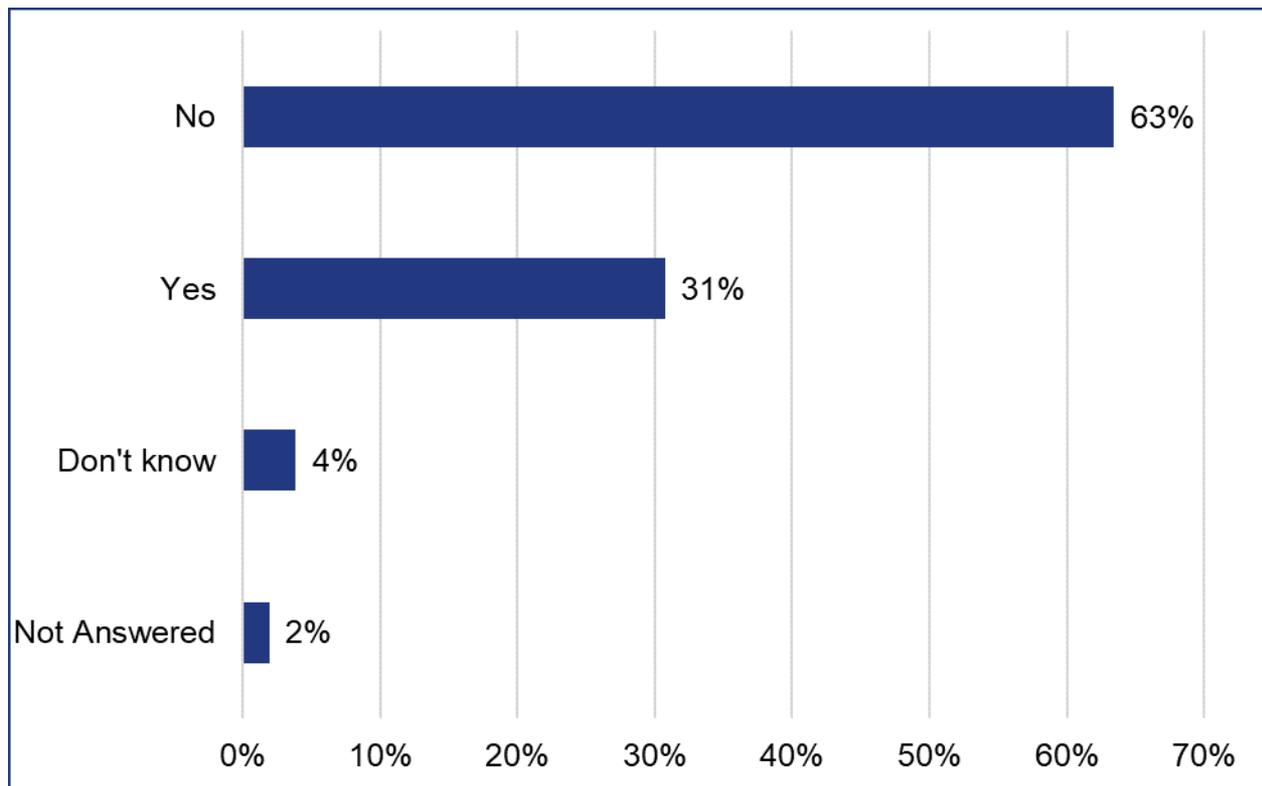


Base: 104 (all responses)

Survey findings – Support of proposals

Respondents were provided with an accessible version of the additional HMO licensing document and asked to read this before completing the survey. Respondents were then asked to identify whether they support the proposals to introduce an additional HMO licensing scheme in Kensington and Chelsea.

- A total of 63 per cent of respondents selected '**No**' when asked if they support the current proposals.
- Whilst 31 per cent of respondents selected '**Yes**' when asked if they support the current proposals.
- A breakdown of results by the capacity in which respondents have responded can be seen overleaf



Base: 104 (all responses)



Survey findings – Support of proposals (continued)

The below table breaks down the results, based on the capacity in which respondents have responded. Please note some categories have been combined (e.g. social and private tenants). Caution should be used when interpreting these results, particularly when looking at percentages, as the number of respondents in each category is fairly low and therefore not very reliable.

- Those responding in an 'other' capacity were most likely to support the proposals (74 per cent), followed by tenants (social and private combined), with 50 per cent support.
- Managing and letting agents (100 per cent) and landlords (91 per cent) were least likely to support the proposals

	Yes		No		Don't know		Not answered	
	Count	%	Count	%	Count	%	Count	%
Landlords	1	5%	19	91%	1	5%	0	0%
Managing and letting agents	0	0%	12	100%	0	0%	0	0%
Owner occupiers	8	22%	24	67%	3	8%	1	3%
Tenants (private and social)	6	50%	5	42%	0	0%	1	8%
Other*	17	74%	6	26%	0	0%	0	0%

*Made up of professional body representatives, tenancy advice organisations, business owners or managers and those indicating an 'other' capacity

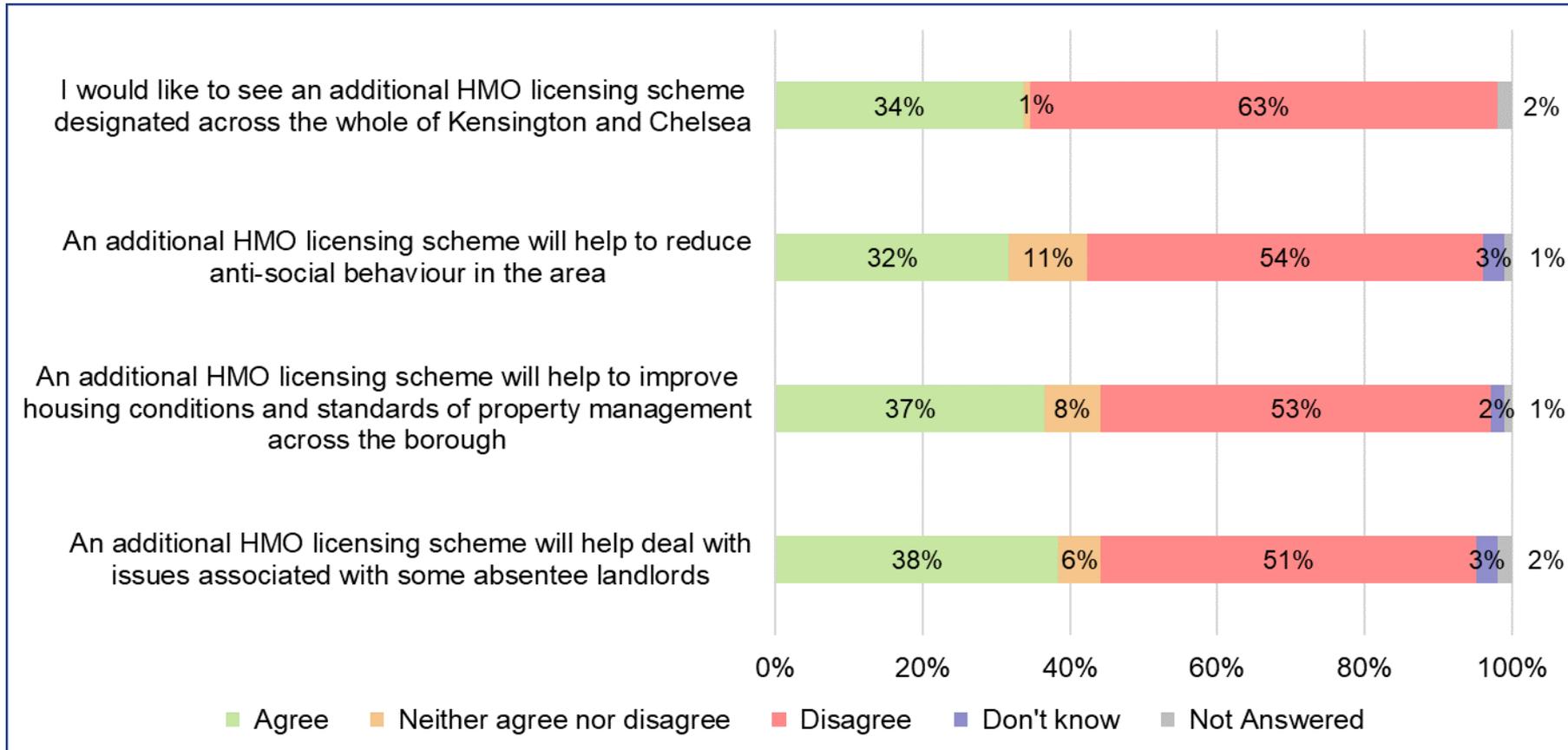


Survey findings – Views on additional licensing for HMOs

Respondents were asked to what extent they agreed, or disagreed, with a series of statements relating to an additional HMO licensing scheme:

- A total of 63 per cent of respondents disagreed/strongly disagreed that they ***'would like to see an additional HMO licensing scheme designated across the whole of Kensington and Chelsea'***, whilst only 34 per cent agreed/strongly agreed.
- Just over half (54 per cent) disagreed/strongly disagreed that ***'An additional HMO licensing scheme will help to improve housing conditions and standards of property management across the borough'*** whilst 32 per cent agreed/strongly agreed.

*Combined scale applied: Strongly Agree/Agree= 'Agree'; Strongly Disagree/Disagree = 'Disagree'



Base: 104 (all responses)

Survey findings – Comments on proposals

Respondents were asked to provide any further comments on the proposal to introduce an additional HMO licensing scheme in Kensington and Chelsea. Comments made have been themed and are summarised in the table below. Examples of comments made can be seen overleaf, with the full list of themes and comments made found in the appendices report.

Theme	Count
Against proposals for additional HMO licensing	41
Tackle bad landlords with existing legislation	16
Unfairly impact owner occupiers/tenants	15
Against proposals for s257 properties	10
Support proposals for additional HMO licensing	7
Other	4
Better support for landlords from the Council	3
More information on how this impacts certain properties	3
Improve the area	2

Base: 83 (all comments)



Survey findings – Comments on proposals (Examples)

“The scheme is totally unnecessary especially in regards to houses converted into flats and the council already has at its disposals a vast array of powers to deal with uncompliant HMOs. It is clearly a revenue raising exercise for the specific department proposing the scheme and it would put an unnecessary burden onto the owners of flats who fall into the proposal.”

Against proposals for additional HMO licensing



“As a director of the Freehold company I already spend far too much time running the building, and the thought of having to deal with additional HMO licensing fills me with dread. Additionally as three of the owner occupiers are pensioners struggling to pay Service Charges the last thing we want is further expense.”

Unfairly impact owner occupiers/tenants

“Poor housing conditions are often hidden and affect those who are most vulnerable and are powerless to resolve their situation. The scheme will help to resolve this and find those landlords who are not treating their tenants fairly and have no intention of doing so. Decent housing conditions are fundamental in giving residents an equal opportunity to live a healthy and safe life. This scheme will help to address these inequalities.”

Support proposals for additional HMO licensing

*“We do not need any more bureaucracy, you already have all the powers you need. This will just increase the burden on good private landlords, increase rents and reduce stock.
Don't do it!”*

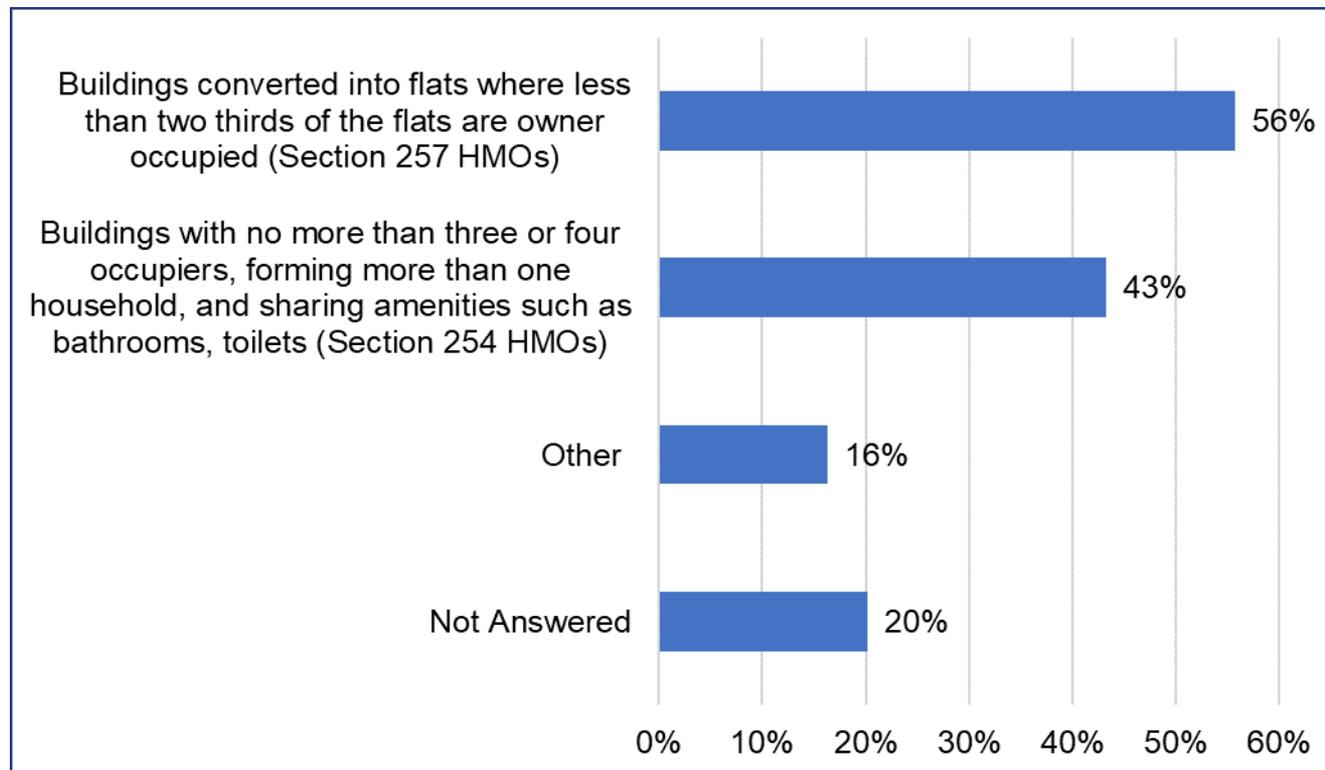
Tackle bad landlords with existing legislation



Survey findings – Inclusion of HMOs in scheme

Respondents were asked to select which types of HMOs should not be included in an additional HMO licensing scheme. Respondents were asked to select all that applied.

- A total of 56 per cent of respondents outlined that they did not think '**Section 257 HMOs**' should be included in an additional HMO licensing scheme.
- A total of 43 per cent of respondents outlined that they did not think '**Section 254 HMOs**' should be included in an additional HMO licensing scheme.
- A breakdown of results by the capacity in which respondents have responded can be seen overleaf



Base: 104 (all responses)



Survey findings – Inclusion of HMOs in scheme (continued)

The below table breaks down the results, based on the capacity in which respondents have responded. Please note some categories have been combined (e.g. social and private tenants). Caution should be used when interpreting these results, particularly when looking at percentages, as the number of respondents in each category is fairly low and therefore not very reliable.

- Managing and letting agents (75 per cent) and owner occupiers (64 per cent) were more likely to indicate that **‘Section 257 HMOs’** should not be included in the scheme.
- Managing and letting agents (67 per cent) and tenants (58 per cent) were more likely to indicate that **‘Section 254 HMOs’** should not be included in the scheme.

	Section 257 HMOs		Section 254 HMOs		Other		Not answered	
	Count	%	Count	%	Count	%	Count	%
Landlords	11	52%	8	38%	7	33%	1	5%
Managing and letting agents	9	75%	8	67%	1	8%	0	0%
Owner occupiers	23	64%	10	28%	5	14%	8	22%
Tenants (private and Social)	4	33%	7	58%	1	8%	4	33%
Other*	11	48%	12	52%	3	13%	8	35%

*Made up of professional body representatives, tenancy advice organisations, business owners or managers and those indicating an ‘other’ capacity



Survey findings - Inclusion of HMOs in scheme:

Other comments

Respondents who selected 'Other' when asked which types of HMOs should not be included in an additional HMO licensing scheme, were able to provide comments about any other suggestions they had. Comments made have been themed and are summarised in the table below. Examples of comments made can be seen below, with the full list of themes and comments made found in the appendices report.

Theme	Count
There should not be a scheme	9
Converted flats with multiple, self-contained owner-occupiers should not be included	7
All of them	3
Other	3

Examples of comments made

“I believe that the existing HMO licensing has enough power and therefore is no need for additional HMO licensing.”

We should not have a scheme

“Self-managed non-purpose built share of freehold buildings”

Converted flats with multiple, self-contained owner-occupiers should not be included

Base: 24 (all comments)



Survey findings – Any other comments about HMOs to be included in the scheme

Respondents were asked to provide any further comments on the different types of HMOs that should, or should not, be included in the additional HMO licensing scheme. Comments made have been themed and are summarised in the table below. Examples of comments made can be seen overleaf, with the full list of themes and comments made found in the appendices report.

Theme	Count
Unfair burden passed onto owner-occupiers not connected to rest of tenants in the building	12
Additional HMO Licensing scheme is not needed	10
s257 properties should be excluded	9
s254 properties should be included	5
Other	5
All HMOs should be licenced	4
See earlier remarks	4
Buildings converted into self-contained flats should be excluded	4

Base: 49 (all comments)



Survey findings – Any other comments about HMOs to be included in the scheme (Examples)

“It is unreasonable to class a small house, as ours with six self contained flats, as an additional HMO where three of the flats are let. Two of the tenanted flats are on the lower ground floor and have a separate entrance to their common parts. In the main part of the building 3 of the 4 flats are owner occupied. A blanket licensing of additional HMOs across RBKC will create expense and extra work for leaseholders in well-run houses and will be of no benefit to them.”

Unfair burden passed onto owner-occupiers not connected to rest of tenants in the building

“While the proposal on Section 254 appears to perfectly appropriate and would address the concerns with HMOs the proposal on self-contained flats Section 257 is truly concerning as a penalty on the owner occupiers who happen to live in a building where other self-contained flats are let out. This is wholly disproportionate and inappropriate.”

s254 properties should be included



“There is no evidence to justify the additional costs and burdens of expanding the scheme in a generalised manner. The existing scheme is adequate.

Additional HMO Licensing scheme is not needed

“When deciding whether a property is a s257 HMO, consideration should be given to the size & percentage liability of the flats under the service charge, as not all properties are divided up equally. So as an example, if a property is divided into four flats but the owner occupied parts are two three bedroomed flats with two privately rented studio flats, this should not be a s257. If the situation is not as clear, then consideration should be given to the percentage service charge of each of the flats in determining whether the property is a s257.

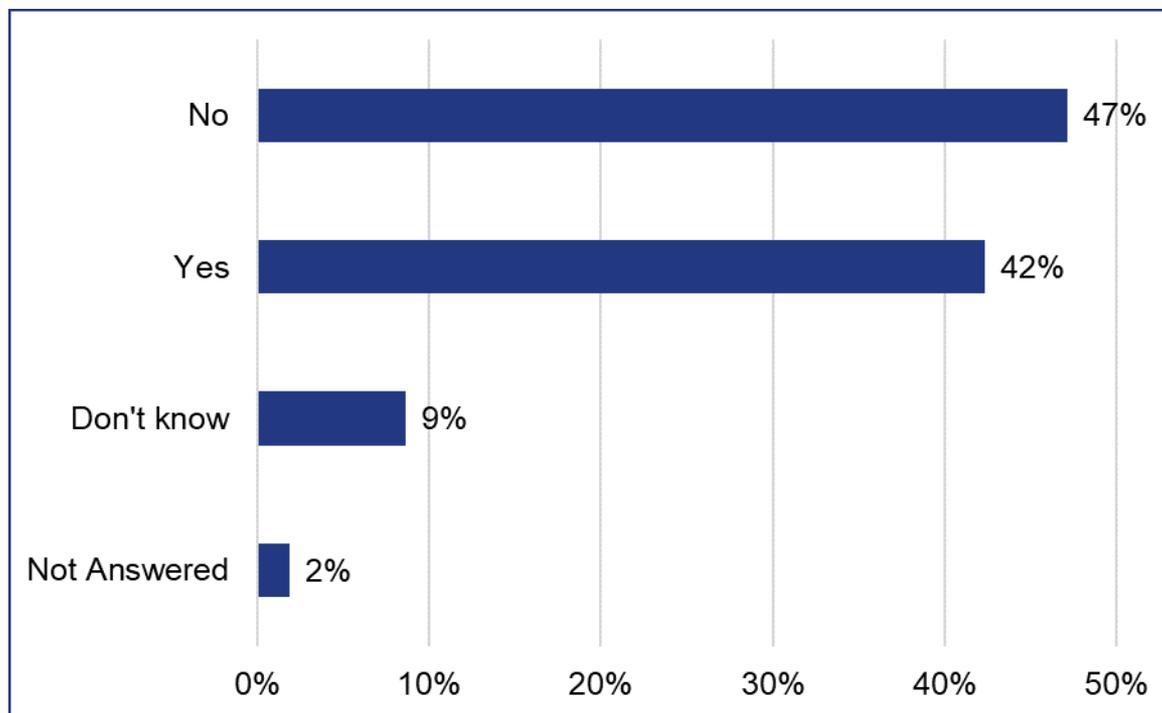
s257 properties should be excluded



Survey findings – Support for licence conditions

Respondents were provided with the proposed conditions that would be attached to the additional HMO licence. They were also provided with a summary of the key conditions. Respondents were then asked whether they support the conditions proposed:

- A total of 47 per cent of respondents selected '**No**' when asked if they supported the licence conditions proposed.
- A total of 42 per cent of respondents selected '**Yes**' when asked if they supported the licence conditions proposed.



Base: 104 (all responses)



Survey findings – Other conditions for HMO licence

Respondents were asked to explain any other conditions that should be included in a HMO licence, or any other comments about the proposed conditions more generally. Comments made have been themed and are summarised in the table below. Examples of comments made can be seen overleaf, with the full list of themes and comments made found in the appendices report.

Theme	Count
Include short term letting	5
Stipulate minimum standards for properties	5
Conditions to address anti-social behaviour	4
Existing legislation can be used	4
Greater detail on occupants to understand specific situations	3
s257 properties should not be included	3
Licence's are too expensive	3
No further comments	3
Other	3
Already practices by landlords to ensure properties are high standards	3
More information required	2
Don't require additional licensing	2
Negative impact on owner-occupiers	1

Base: 39 (all comments)



Survey findings – Other conditions for HMO licence (Examples)

“If there is a way of extending the proposed scheme to include short-term letting properties, I would strongly support this as these properties have been generating significant ASB problems in my ward and are not currently captured adequately in either of the proposed categories.”

Include short term letting

“Suitable arrangements to address and deal with Anti social behaviour are an absolute vital requirement as is the disposal and management of waste /rubbish.”

Conditions to address anti-social behaviour

“Where it is known that more than ten percent (not being a figure less than 5) or 5 tenants of a HMO have physical or mental health needs that that there are regular visits by council to ensure this needs are being met (quarterly?).”

Greater detail on occupants to understand specific situations



“It was noted that the consultation was silent on what HMO standards will be applied to licensable properties. It would be useful for landlords to see these so that they are clear on what standards their properties need to adhere to.”

Stipulate minimum standards for properties

“There are already measures in place to ensure conditions are met under Housing Act 2004 and the fixed penalty notices are there to deal with issues already so any extra costs & fees seems like another way to make money from Landlords.”

Existing legislation can be used

“This form is not appropriate for the proposed S257 licences, as many of these properties will be owner occupied.”

s257 properties should not be included

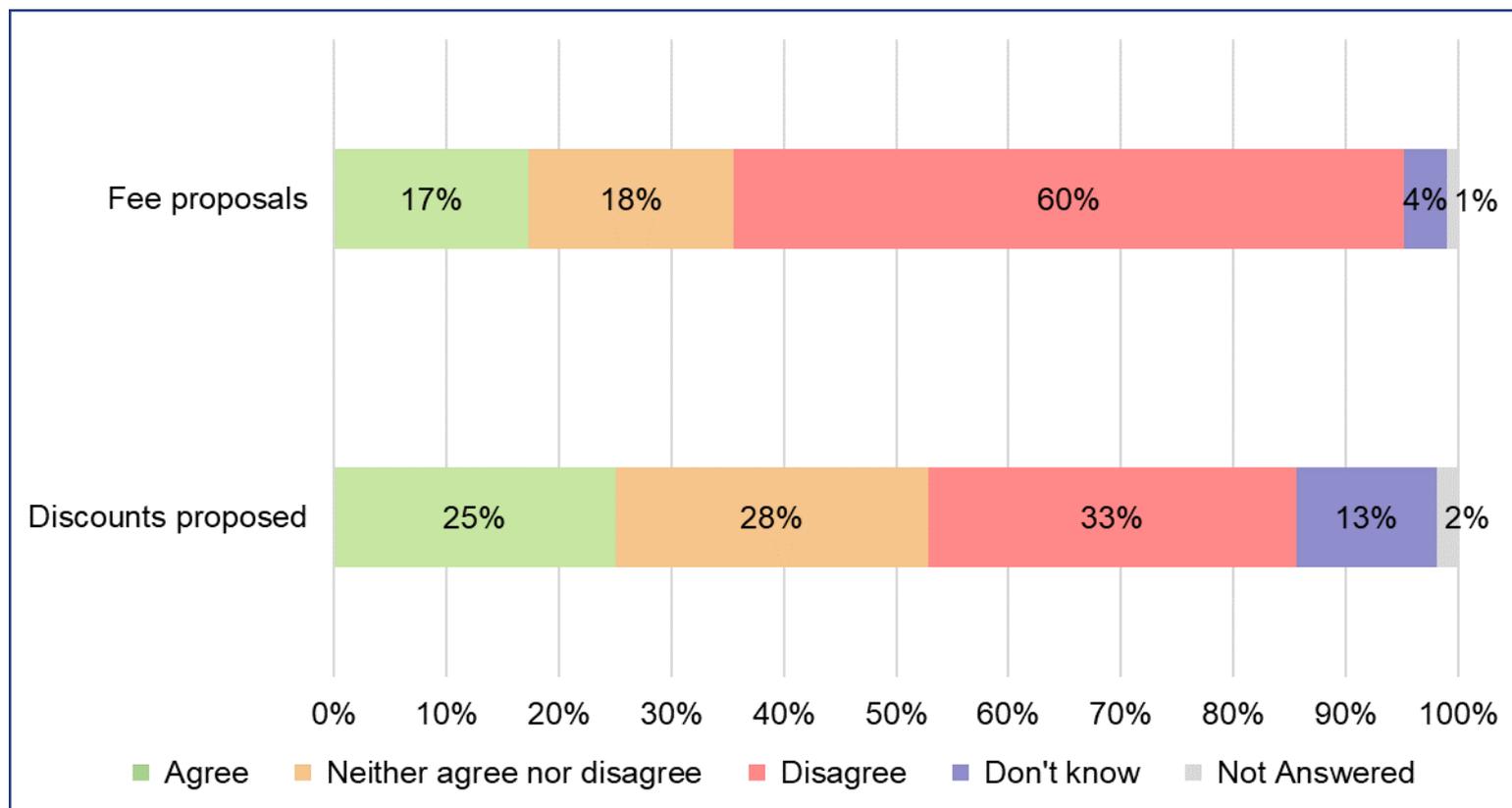


Survey findings – Support for proposed fees and discounts

Respondents were provided with the HMO licensing document and a summary of the proposed fees and discounts associated with the licence was provided. Respondents were asked to what extent they agreed or disagreed with both the fee proposals and the discounts proposed.

- A total of 17 per cent of respondents selected strongly agreed/agreed with the fee proposals, however a 60 per cent of respondents strongly disagreed/disagreed with the proposed fees.
- A quarter (25 per cent) of respondents strongly agreed/agreed with the discounts proposed, a third (33 per cent) strongly disagreed/disagreed and a total of 28 per cent neither agreed nor disagreed.

**Combined scale applied: Strongly Agree/Agree= 'Agree'; Strongly Disagree/Disagree = 'Disagree'*



Base: 104 (all responses)



Survey findings – Support for proposed fees and discounts (continued)

The below table breaks down the results, based on the capacity in which respondents have responded. Please note some categories have been combined (e.g. social and private tenants). Caution should be used when interpreting these results, particularly when looking at percentages, as the number of respondents in each category is fairly low and therefore not very reliable.

- Managing and letting agents (92 per cent) and landlords (86 per cent) were more likely to disagree with the proposed fees. Those responding in an 'other' capacity were most likely (48 per cent) to agree with the proposed fees.
- Managing and letting agents (58 per cent) and tenants (50 per cent) were more likely to disagree with the proposed discounts. Those responding in an 'other' capacity were most likely (61 per cent) to agree with the proposed discounts.

Support for proposed fees	Agree		Neither agree nor disagree		Disagree		Don't know		Not answered	
	Count	%	Count	%	Count	%	Count	%	Count	%
	Landlords	0	0%	3	14%	18	86%	0	0%	0
Managing and letting agents	1	8%	0	0%	11	92%	0	0%	0	0%
Owner occupiers	4	11%	7	19%	21	58%	3	8%	1	3%
Tenants (private and Social)	2	17%	3	25%	6	50%	1	8%	0	0%
Other*	11	48%	6	26%	6	26%	0	0%	0	0%

Support for proposed discounts	Agree		Neither agree nor disagree		Disagree		Don't know		Not answered	
	Count	%	Count	%	Count	%	Count	%	Count	%
	Landlords	1	5%	7	33%	8	38%	5	24%	0
Managing and letting agents	3	25%	2	17%	7	58%	0	0%	0	0%
Owner occupiers	5	14%	15	42%	7	19%	7	19%	2	6%
Tenants (private and Social)	3	25%	2	17%	6	50%	1	8%	0	0%
Other*	14	61%	3	13%	6	26%	0	0%	0	0%

*Made up of professional body representatives, tenancy advice organisations, business owners or managers and those indicating an 'other' capacity

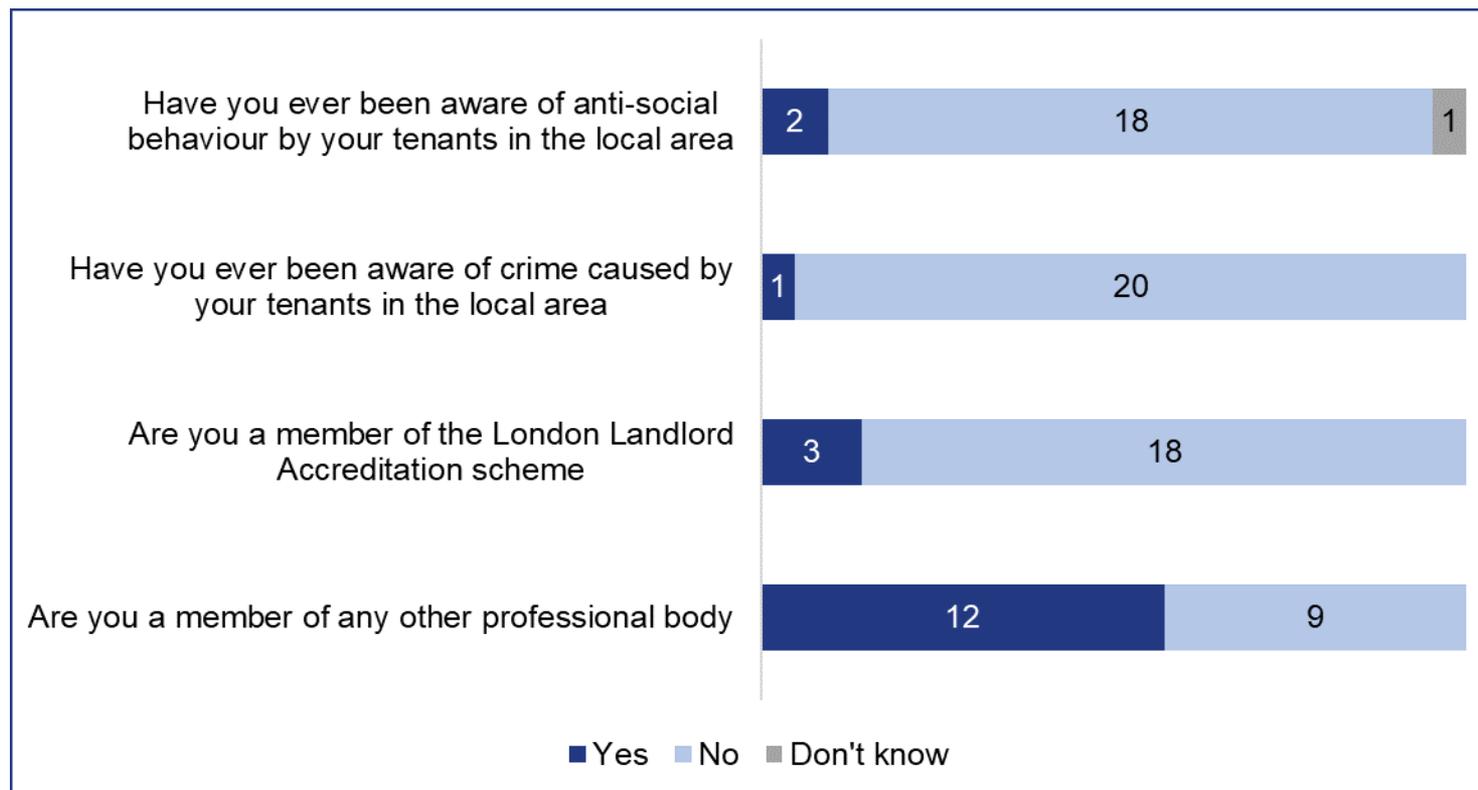
Combined scale applied: Strongly Agree/Agree = 'Agree'; Strongly Disagree/Disagree = 'Disagree'



Survey findings – Questions for landlords

Those who responded as a landlord were asked to provide yes or no answers to a series of questions. In total, there were 21 landlords who responded to this survey. The graph below does not use percentages because the base number (21) is too low.

- A total of 18 out of the 21 landlords were not aware of anti-social behaviour caused by their tenants in the local area, whilst two landlords said they were aware that their tenant had caused anti-social behaviour.
- A total of 20 out of the 21 landlords were not aware of crime caused by their tenants in the local area, whilst one landlord said they were aware that their tenant had caused anti-social behaviour.



Base: 21 (all who responded as a landlord)



Survey findings – Questions for private tenants

Those who responded as a private tenant were asked a series of questions. In total, there were six private tenants who responded to this survey. Percentages have not been used because the base (six) is too low. A summary of the answers is provided below.

Information received

- All six received a written tenancy agreement.
- Five received a copy of the energy performance certificate.
- Five received a copy of the Government's official 'How to Rent guide'.
- Four received a copy of the electrical safety certificate.
- Four received information about fire safety arrangements in the house.

Contacting the landlord

- All seven respondents knew the name of their landlord.
- Six knew how to contact their landlord via phone and address.

Information on their property

- Six respondents had gas heating in the property they were living in.
- Five had a copy of the latest Gas Safety certificate.
- Five said that their landlord took a deposit.
- Five said that their deposit is protected in a UK Government backed scheme.
- Five said that they had adequate waste storage facilities .
- Four said they **had not** experienced or witnessed anti-social behaviour in an HMO, whilst two said they **had** experienced or witnessed this.
- Three respondents said **yes** when asked if they felt that private landlords maintain their properties to a good standard, whilst three others said **no** when asked the same question.
- Four strongly agreed that private landlords act responsibly in letting, managing and maintaining their properties; whilst one disagreed, and one strongly disagreed.



Survey findings – Final comments on the proposals

Respondents were asked to provide any final comments about the additional HMO licensing scheme. Comments made have been themed and are summarised in the table below. Examples of comments made can be seen overleaf, with the full list of themes and comments made found in the appendices report.

Theme	Count
Disagree with the proposals	16
The proposals need to be reviewed	12
Review of the proposed fees	10
s257 properties should not be included	6
Other	5
Already given opinion	4
Further information required	3
Use powers that already exist	2

Base: 57 (all comments)



Survey findings – Final comments on the proposals (Examples)

“Whilst I appreciate some HMOs with shared facilities require monitoring to safeguard occupants, I strongly disagree that this licence should be applied where flats are self-contained. There is a danger of regulation creep, where owner / occupiers are caught in expanding regulation which do not reduce risk or enhance enjoyment of the property. Additionally, there is a danger that this will turn into a revenue generating scheme. I strongly disagree that this scheme is applied to buildings with self contained flats.

Disagree with the proposals for buildings converted into flats i.e. s 257

“Noting the fees - it is likely that additional direct costs for letting properties will be passed on to tenants. Where there are multiple occupiers in a single unit the incremental increase in rent is likely to be less severe as it can be spread across multiple households. However, in the case that the HMO is a building converted to self-contained units the current fee proposals are likely to increase pressure on rents, many of which are already stretching the boundaries of affordability for tenants.”

Review of the proposed fees



“The proposals need significant further thought and preparation. They are confused and unsatisfactory.”

The proposals need to be reviewed

“s257 definition of owner occupier is too narrow. s257 properties should not be included.”

s257 properties should not be included

“As an owner occupier I have not understood who is responsible for paying the proposed fees and would like clarification on this .

Further information required



Email correspondence in response to the consultation

The Private Sector Housing Team received 21 email submissions in response to the consultation. These emails have been summarised in the following slides below. As part of the email submissions, some minor suggestions to license conditions were received, and these are being considered alongside other suggestions.

General key points:

- 'Light touch' approach welcomed by landlords and accreditation organisations for letting agents and managing agents.
- Evidence base suggest there are more HMOs in south of the borough with Cat 1 hazards – suggestion to have a more targeted additional licensing scheme in the south of the borough with the possibility of extending later.
- 2015 general approval to designate states that the LA must consult with persons likely to be affected – without actively consulting with leaseholders this condition is not met, a scheme could therefore not be introduced without Secretary of State approval.
- Inclusion of s254s and s257s as proposed will put too much demand on council staff and systems.
- Additional licensing will make the landlords not licensing more conspicuous, making it easier to focus enforcement on them – could also consider selective licensing in certain areas instead.
- Concerns from planning that more focus on improving standards, which is accepted as being of benefit, could also encourage further self-containment and loss of HMOs.
- There is already much housing and PRS regulation, no need for more.
- All the areas of health and safety and tenants' rights are already covered by multiple areas of existing legislation.
- This will place burden on owner occupiers within these buildings and an excuse for managing agents etc to charge more.
- This effort to tackle criminal landlords is disproportionate and will impact many good landlords and owner occupiers within s257 properties.
- Landlords already improve housing standards if they want to attract good tenants.
- Many part owners of freeholds will be caught by the licence with the possibility of enormous fines, for items they have little or no control over.
- Properties comprising two or more households who share facilities (kitchen, bathroom and/or toilet) and occupy the property as their only or main residence, even if they are all friends and occupy the property on a single tenancy, that is section 254 properties would be C3 (flats/single dwellings) or C4 (small HMOs of up to 6 occupants). There is permitted development to change from C3 to C4 and back again without requiring planning permission. Concerns over resource implication of planning comments required when these small HMOs are requesting a licence.
- Should focus on overseas absentee landlords and student accommodation.



Email correspondence in response to the consultation (continued)

Section 254 HMOs:

- S254 HMOs are businesses and should be licensed. Reducing the numbers living in poor conditions is a justifiable business expense. Some of the costs may be passed onto tenants, potentially affecting affordability.

Section 257 HMOs:

- Difficulties including all s257s due to issue of establishing if a conversion satisfied the relevant Building Regulation and complexity of proving 1991 Building Reg compliance (or other appropriate B Reg compliance depending on date of conversion).
- As there is so much churn in the private rented sector it will be difficult for letting/managing agents to assess whether a property needs a s257 licence – properties can easily fall in and out of the requirement.
- Owner occupiers in s257 properties will face higher service charges and potential difficulty with mortgage lenders.
- Need to ensure landlords and managing agents have clear explanation of what a s257 is including advice on B Reg compliance.
- Target larger s257 properties where more than 5 units of accommodation.
- License s257 HMOs where the whole building and all flats are under single ownership/the same control. Also, where the number of flats is more than the number of storeys in the building.
- Only converted s257 properties where ALL tenanted should be included. To use the more than a third tenanted definition for inclusion means the single owner occupier in these buildings is penalised.

Fee Proposals:

- Adjust fees for smaller s257 properties.
- Extend £200 discount to accredited safe agent members to encourage professionalism in the lettings industry.
- Change wording around discounts so it is clear that no discount is available if the property is not licensed within 6 months of property being licensable.
- Challenge on 70:30 split on fees – claim that it is too front loaded.

Inspections:

- Make the inspection regime/methodology clear – landlords don't want to pay for bureaucracy, they need to understand what inspections will take place.
- Publish service standards and timescales for processing and approving applications.

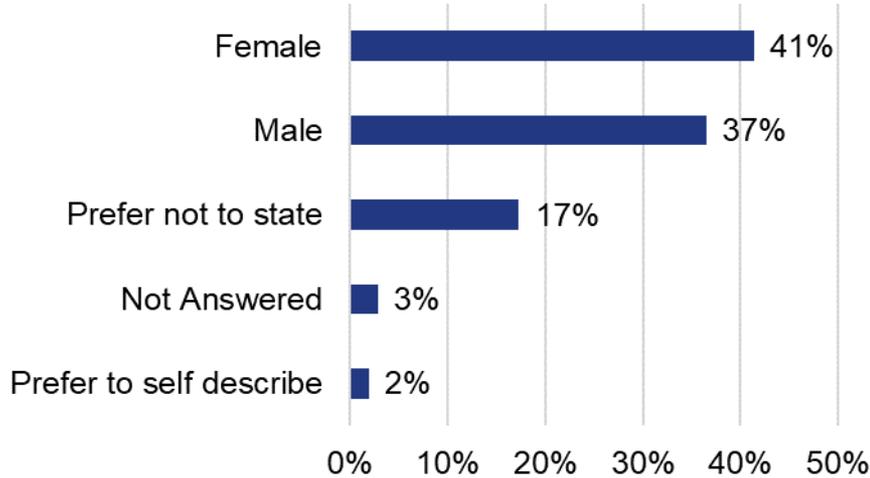
Enforcement as part of licensing scheme:

- Need to deliver effective enforcement on the back of any licensing scheme.
- Closer liaison with letting agents and encourage landlords to use regulated letting agents.



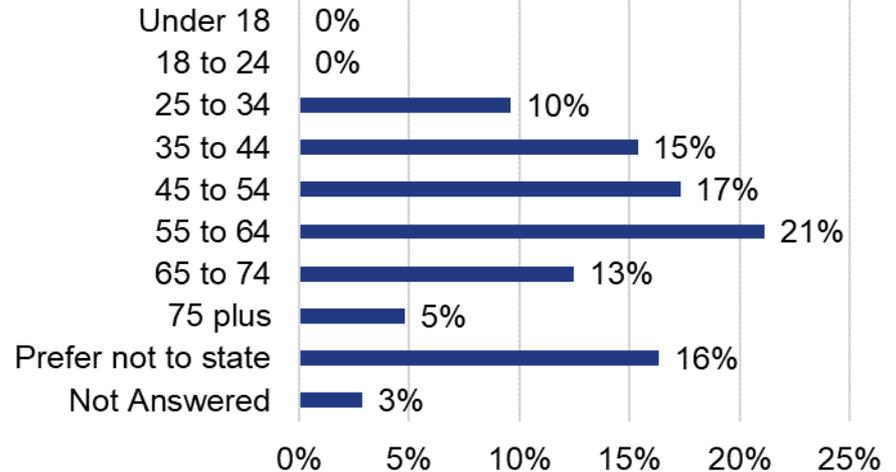
About respondents: Demographic breakdown

What is your sex?



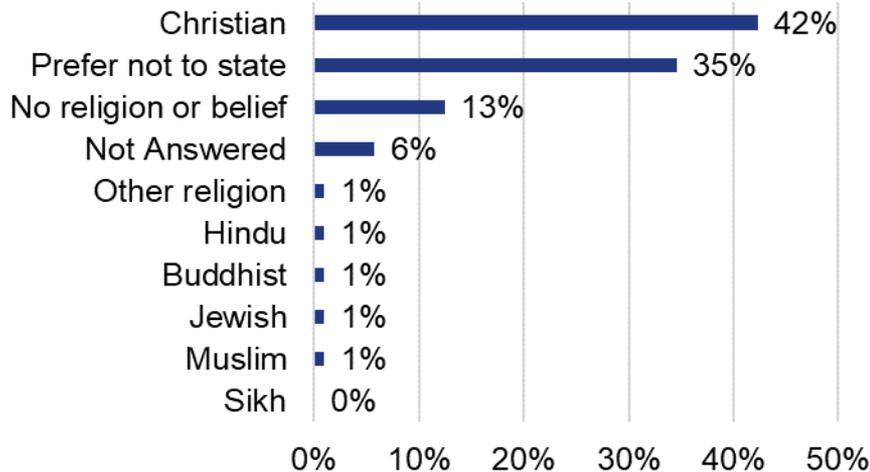
Base: 104 (all responses)

What is your age group?



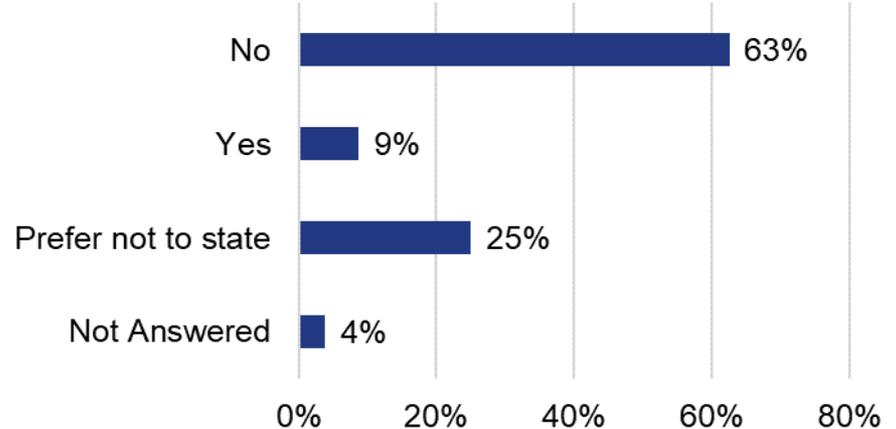
Base: 104 (all responses)

What is your religion or belief?



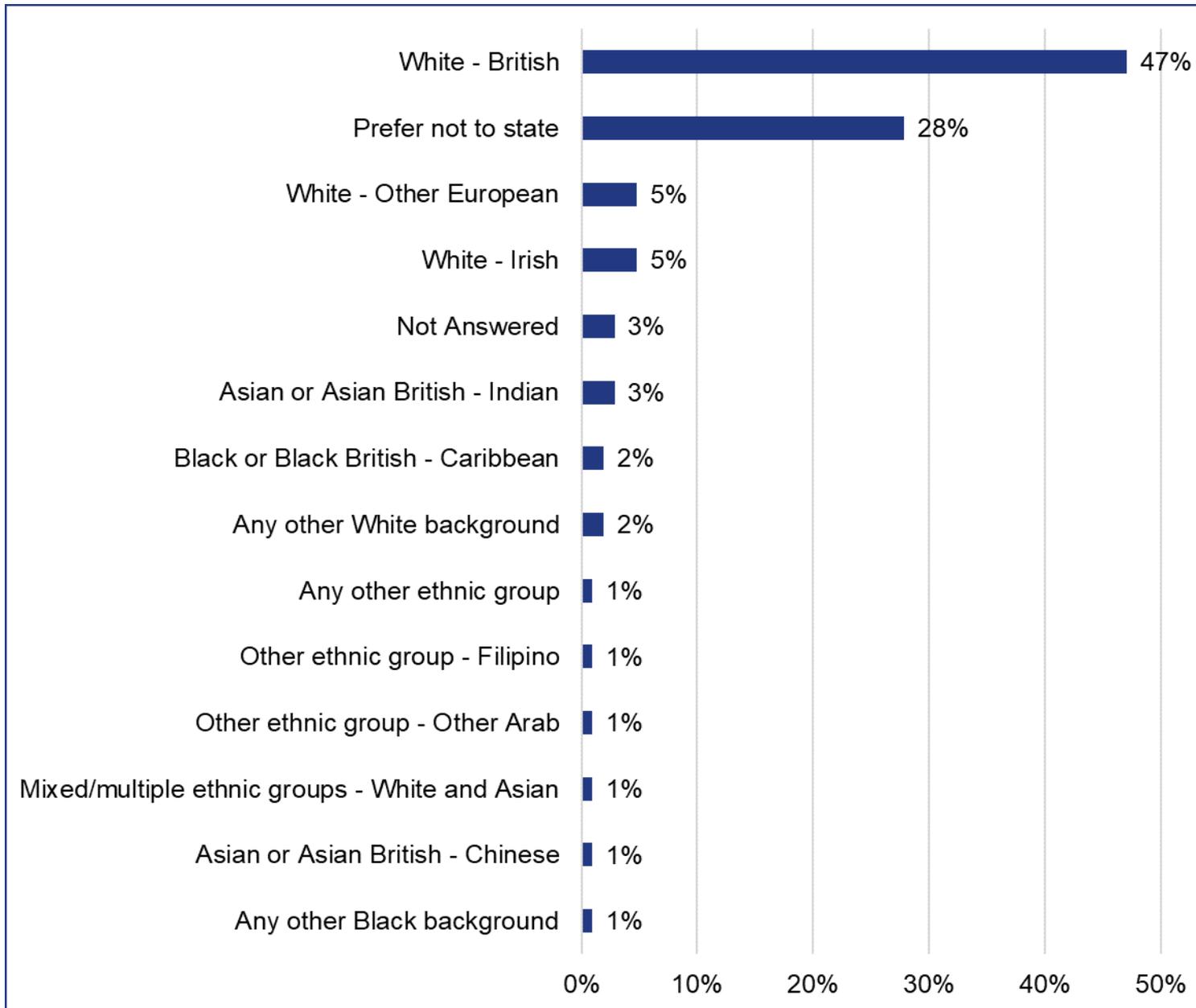
Base: 104 (all responses)

Do you have a long-term illness/disability?



Base: 104 (all responses)

About respondents: Ethnic group



Base: 104 (all responses)



THE ROYAL BOROUGH OF
KENSINGTON
AND CHELSEA