

Private Rented Property Licensing Consultation

Summary of representations made to the Consultation and the Council's Considerations and Responses

May 2024

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Summary of representations made to the consultation and the council's considerations and responses.

1. Introduction

In order to obtain a wide range of views on Waltham Forest Council's proposals to introduce new additional and selective licensing schemes, a wide-ranging public consultation was conducted from 15 December 2023 to 10 March 2024. In order to gather feedback from the public and people who would be impacted by the scheme, the Council ran the statutory consultation for a little over 12 weeks, longer than the required minimum, and used several methods to gather feedback, including:

- An open access online consultation questionnaire which had 544 responses, including from 398 landlords and 10 letting/managing agents.
- A demographically representative telephone survey of over 1000 residents
- Two Online Landlord forum events
- An in-person public meeting
- Private tenant focus groups
- Contacting over 500 stakeholders including neighbouring and nearby London boroughs, public sector and community/voluntary organisations, social housing providers, local letting agents, housing developers and tenant and landlord representative bodies
- Creating a dedicated phone and e-mail address were available to residents, landlords and organisations to ask questions about the proposals and consultation or receive help to respond to the consultation

From the online and telephone surveys, there was overall support for the proposed additional and selective licensing schemes, with 59% of respondents agreeing with the proposed selective scheme, and 63% agreeing with the proposed additional licensing scheme.

The consultation received a wide range of responses concerning licence conditions, proposed fees and discounts, the designation area, support for landlords and tenants, as well as general views on licensing schemes.

In accordance with sections 56(3)(b) and 80(9)(b) of the Housing Act 2004, the Council is required to consider any representations made during the consultation that have not been withdrawn. The Council carefully considered all of the issues raised by respondents through the consultation exercise and this report provides a detailed account of the Council's considerations and formal responses to the representations received.

Appendix 1 contains the full comments made as part of the consultation survey, where free text boxes were provided for additional commentary.

2. Changes made in response to consultation feedback

In response to the consultation feedback, the main change that the Council has made relates to the inclusion of an additional discount of £95 against the cost of a full licence fee for properties that have an EPC rating of C. In making this change, the Council listened carefully to representations to the effect that applications that relate to homes which have a relatively good EPC energy rating of C should also attract a discounted application fee. In particular, the council accepted that, given the relative old age profile of its privately rented stock, it can be challenging

to achieve an EPC of B or above given the nature of the original building construction and other constraints. Eligibility for all EPC-related discounts will be subject to specified eligibility criteria.

Several responders made requests, varying in nature, for the Council to provide more support for landlords and private sector tenants as part of the administration and operation of any future licensing schemes. Whilst the Council has not made any specific changes as regards the essential parameters of its proposed schemes (i.e. the geographical areas covered, scheme objectives, fee structure and licence conditions) the Council will additionally commit to keeping the administration and operation of any future licensing schemes under regular review in order to identify any areas or issues where it could provide additional support. For example, an issue that was raised at one of the Landlord Forum events was the ability for licence applicants to re-apply for a licence, as opposed to making a new application, with a consequent reduction on the amount of information that was required to accompany an application thereby saving time. There is a facility for landlords to re-apply for a licence before an existing licence has expired and the Council will ensure that landlords and agents have access to information about this.

3. Comments received in support of the proposed schemes

The Council would like to acknowledge some of the comments received during the consultation in support of the proposed schemes:

- Having a licensing scheme will allow the council to regulate the landlords and properties ensuring health and safety for the tenants and a minimum standard of a decent home. It will also allow the council to hold landlords accountable for the standard of their properties
- I think it's a really important thing to have in place to protect tenants living in properties in WF as well as their neighbours
- This scheme should not stop as it gives landlords a duty of care
- Go for it! Our lives were made a misery during lockdown due to an HMO that became a drug house on our street. And we felt powerless to do anything about it. It should have been easy to resolve - the landlord gets their licence revoked and is forced to sell the asset. More broadly speaking, taxing buy-to-let out of existence would do everyone a favour. So don't be shy.
- I welcome the Council's proposals to continue these licensing schemes. I think that it is entirely reasonable to expect landlords to proactively manage their properties for the benefit of their tenants and the wider community. I actually think there should be a national licensing scheme but realise this is outside Waltham Forest's control. Without these licensing schemes, I fear there would be a deterioration in housing standards and environmental quality in the borough.
- Just that it feels very very important for the safety and well-being of the whole Borough to keep and strengthen these licenses!
- Neighbouring boroughs have large scale property licensing already in place, so it makes sense for Waltham Forest to have one too to prevent problem landlords and tenants transferring to Waltham Forest. Having a cohesive approach amongst neighbouring boroughs should raise standards, promote community safety, and go a long way to meet collective objectives across the whole region.
- The more stringent you make them the more improvements to tenants living standards and quality of life. Quality of life should be everyone's right! Please make these proposals so tenants and areas improve and not to benefit the landlords.

4. Summary of representations made to the consultation and the council's considerations and responses

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce a borough-wide additional licensing scheme, and a selective licensing scheme in 20 of the 22 wards of the borough. The consultation also invited views on the proposed licence conditions and fee structure. The consultation questionnaire featured free text boxes, enabling respondents with the opportunity to comment on the proposals in their own words, specifically:

- If applicable, why they disagreed with the proposed additional and selective licensing schemes
- If the wards in the proposed selective licensing scheme were appropriate and if other wards should be included or excluded
- Whether there were alternatives to licensing that the council should consider
- Views on the proposed fees and discounts
- Views on the proposed licence conditions
- Views on the schemes' objectives

The comments received from the survey have been analysed and categorised into themes. 398 of the 544 responses to the online survey were from landlords, and therefore most of written comments were from landlords

The table set out below shows a summary of the theme of common representations made; the number of consultation responses received that fall into that theme, and how the Council has given consideration to these and responded.

Comments regarding the proposed licensing schemes

Theme	No. Comments	Council Response
<p>Licensing is not effective and does not improve housing conditions or ASB in the designated areas</p>	<p>123</p>	<p>Since the introduction of Waltham Forest's licensing schemes in 2020, and the earlier Selective Licensing scheme that commenced in 2015 the Council has gathered substantial evidence demonstrating the effectiveness of these schemes, including the improvement of over 1,680 properties (for the current schemes). Further details were set out in the documentation that accompanied the consultation exercise.</p> <p>Selective licensing has proven to be an effective tool for many local authorities in addressing specific issues. This is supported by 'An Independent Review of the Use and Effectiveness of Selective Licensing', commissioned by the Ministry of Housing, Communities & Local Government (MHCLG), which found that selective licensing can be an 'effective policy tool' that achieves demonstrable positive outcomes.</p> <p>Furthermore, recent research published in BMJ Open by the School for Public Health Research suggests that the licensing of private rented housing in London is associated with a decrease in anti-social behaviour (ASB), as evidenced by fewer calls being made regarding ASB concerns.</p> <p>The evidence shows that licensing is effective in improving housing conditions and has an impact on ASB in designated areas.</p>
<p>Licensing is not necessary as landlords already meet the proposed conditions and the council can use existing powers</p>	<p>24</p>	<p>The Council acknowledges that many landlords operating in the borough maintain their properties to a high standard. The evidence presented during the consultation shows that there are significant problems with poor housing conditions, and ASB in the borough's private rented sector (PRS), which licensing can help to address. The council presented evidence of the enforcement action undertaken in the previous schemes, which indicates that not all landlords meet the proposed licence conditions.</p> <p>The current powers the council has, including the use of Part 1 of the Housing Act 2004, do not require landlords to proactively manage and maintain their properties.</p> <p>Formal action under the Housing Act can be a slow process, and improvements to properties can take many months. Also, this requires the council to serve a notice and it is only if that notice is not complied with, that the council can then take enforcement action.</p> <p>The Council considered a range of alternatives to selective and additional licensing, but do not believe they alone are as effective in dealing with poor housing conditions and ASB in the</p>

Theme	No. Comments	Council Response
		borough. In particular, the conditions imposed when a licence is granted require Licence Holders to proactively manage and maintain their rented homes.
Licensing will have a negative impact on tenants, by increasing their rents	92	The Council has operated large-scale discretionary licensing schemes since 2015 and has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere, and this is similar to the findings from other local authorities who have also been operating licensing schemes. Similarly, the Independent Review of the Use and Effectiveness of Selective Licensing commissioned by MHCLG showed that selective licensing did not result in an increase in rents in areas with a scheme, that market forces dictated the rent level.
The scheme needs to be enforced and inspections carried out	25	The Council acknowledges the importance of enforcing licensing schemes and conducting inspections and has a strong history of carrying out inspections and taking enforcement action where appropriate. Despite the disruptions caused by the Covid lockdowns in 2020 and 2021, we have conducted over 8,000 property audits, leading to improvements in over 1,680 properties. We have a robust approach to enforcement against private landlords who fail to meet their legal obligations and were one of the first local authorities nationally to adopt new powers to issue a financial penalty of up to £30,000 under the Housing and Planning Act 2016. We are also a leading authority in the use of Interim Management Orders to control unlicensed privately rented properties. Other examples of the Council's proactive approach to enforcement were set out in the documentation that accompanied the consultation exercise. Should a decision be made to progress with a further selective licensing leading to its' approval, and adopting a further additional licensing scheme, the Council will inspect and enforce in line with its' enforcement policy.

Theme	No. Comments	Council Response
<p>Licensing unfairly targets good landlords, who will pay for a licence and meet the licence conditions, whilst bad landlords will not register.</p>	70	<p>The council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the borough is experiencing large scale issues in the private rented sector with poor housing conditions and Anti-Social Behaviour. Where properties come to the attention of the Council that require licensing the Council adopts a robust approach</p> <p>The Council's intention is to use the regulatory framework provided by selective and additional licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. If adopted we will develop guidance and continue to work with landlords to bring about compliance where possible, and we will also continue to use robust enforcement against wilfully non-compliant landlords.</p>
<p>It's a money-making scheme</p>	99	<p>By law, the Council is not allowed to make money from the licensing schemes. The proposed fee structure for the new schemes has been calculated to be cost neutral, covering the legitimate expenses from the administration and enforcement of the licensing schemes. These costs are offset by the anticipated income from the expected number of licence applications under the proposed designations.</p>
<p>The scheme is an overreach of council powers</p>	5	<p>The introduction of a licensing scheme by the Council is not an overreach of its powers, but rather a lawful exercise of its authority to do so if approved under the Housing Act of 2004. This Act empowers local authorities to implement additional and selective licensing schemes if the relevant legal tests are met. Any decision to designate a discretionary licensing scheme can only be made following a statutory consultation with individuals who are likely to be affected by the scheme.</p> <p>For selective licensing that would cover more than 20% of their geographical area or affect more than 20% of privately rented homes in the local authority area, the Council is required to obtain confirmation from the Secretary of State. This ensures that such a significant decision is not taken lightly and is subject to appropriate checks and balances.</p>
<p>Opposition to the scheme and do not want the council to implement the proposed licensing schemes</p>	114	<p>The Council has evidence that it considers demonstrates there is a need for selective and additional licensing to tackle persistent issues with poor property conditions and ASB. The Council has considered alternative measures to property licensing that would support the Council in achieving the objectives of selective and additional licensing. However, it is our</p>

Theme	No. Comments	Council Response
		opinion that, none of them, either individually or collectively, can achieve the objectives that we intend to deliver through the proposed licensing schemes at the scale that is necessary.
Licensing will reduce the housing supply in the private rented sector as landlords will sell properties rather than rent them out under the scheme	25	The Council have seen no evidence that landlords have moved elsewhere or that there has been an increase in difficulty in finding rental properties in the areas covered by the existing licensing schemes. This is similar to the evidence from other local authorities who have also been operating licensing schemes. The evidence suggests that the private rented sector is a growing sector, and properties continue to be in high demand, including in areas where licensing has been introduced. Whilst some landlords do make a decision to no longer rent there is no evidence that suggests that this is connected to licencing schemes.
Council and Housing Association housing should also be covered by the schemes	11	<p>Under the Housing Act 2004, social housing is explicitly exempt from licensing. Instead, it falls under the jurisdiction of the Regulator of Social Housing (RSH), an independent body responsible for setting standards that all registered social housing providers must meet. The RSH also holds landlords to account for compliance with these standards.</p> <p>The Council recognises that issues related to poor property conditions and ASB can arise in all property tenures. However, licensing is a tool specifically designed for the Council to address these issues within the PRS. The proposed licensing schemes will form part of the Council's wider strategy to improve the quality of life for all borough residents. A key objective of the Council's Housing Strategy is to 'ensure decent, safe, and healthy homes' across all housing tenures.</p>
There should be exemptions or discounts for those covered by the previous scheme	10	<p>The proposed fees for the new licensing schemes have been calculated to be cost-neutral to the Council. This means that the licence fees are set at a level that covers the costs of setting up and administering the schemes.</p> <p>Licenses issued under the current schemes are valid for up to 5 years, with expiry dates between 2025 and 2028, depending on the date the licence was granted. Therefore, if adopted, many landlords won't need to seek a new licence until well into any future schemes.</p> <p>We have considered carefully the suggestion of exemptions or discounts for those covered by the previous scheme, however implementing such a measure could potentially disrupt the cost-neutrality of the new schemes. We are committed to ensuring that any scheme is administered effectively and efficiently, and that the costs are shared fairly among all landlords.</p>

Theme	No. Comments	Council Response
<p>There should be more support of tenants so they can raise complaints without being penalised by their landlords</p>	<p>20</p>	<p>The Council is committed to providing robust support for tenants, and we have several measures already in place to ensure this.</p> <p>Our guidance for tenants, available on the Council’s webpage, provides comprehensive information on how tenants can navigate issues with their private rented property. This includes details on how to report concerns about the condition of their property. Tenants can currently use a dedicated email to report issues, call our licensing telephone line to speak to officers, or use an online reporting form on the Council’s website.</p> <p>In addition, the Private Sector Housing and Licensing Team runs drop-in sessions which offer tenants and residents the opportunity to speak face-to-face with a team member about issues they are experiencing with a private rented property. This includes discussions about tenant rights and landlord responsibilities.</p> <p>Licensing schemes support how the Council is able to adopt a proactive approach to tackling poor housing conditions and raising standards in private rented housing. This allows renters to become more aware of their rights and responsibilities and have greater access to council services that can support them.</p>
<p>All wards should be included in the scheme</p>	<p>50</p>	<p>The Council can only introduce selective licensing in areas in the borough where the relevant legal tests are met as set out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015. The council carried out a detailed analysis of the evidence available and has been selective in proposing a selective licensing designation for the area of the borough where they meet the criteria of poor housing conditions and ASB. In relation to all wards in the proposed designation, there is evidence of both poor property conditions meaning that significant numbers of properties need to be inspected and significant and persistent ASB. Endlebury and Hatch Lane & Highams Park North are not included in the proposed designation as there is not the cumulative evidence of significant levels of poor property conditions and/or persistent ASB</p>
<p>Chingford Green should be excluded</p>	<p>2</p>	<p>As stated above, the Council has conducted a detailed analysis of its housing stock. The evidence, as detailed in the consultation pack, indicates poor housing conditions and ASB in the Chingford Green ward. The approach taken has been consistent towards all wards and there are no factors that would justify Chingford Green ward being excluded from the proposed selective licensing scheme.</p>

Theme	No. Comments	Council Response
Highams Park should be included	1	As stated above, the Council has conducted a detailed analysis of its housing stock. The evidence, as detailed in the consultation pack, does not indicate that Hatch Lane & Highams Park North ward has the significant levels of poor property conditions and/or persistent ASB to meet the necessary criteria for inclusion within the selective licensing scheme. The ward will, however, be kept under review and a second designation could be considered should the evidence change.
It should be more selective	4	As stated above, the Council can only introduce licensing in areas of the borough if there is evidence that the area meets the criteria specified in the Housing Act 2004. The Council has conducted a detailed analysis of housing conditions in its area together with other relevant data. Guided by the evidence, the council has been selective in identifying the areas of the borough where it considers that the relevant legal test and criteria are met.
HMO Licensing is unfair on people in house shares, as landlords will prefer to let to families or will leave properties under occupied	5	The proposed licensing schemes would cover private rented properties let to single families, as well as HMOs. The council has not seen any evidence to suggest that landlords prefer to let to single families over sharers. In the event that the Council's proposed selective and additional licensing schemes are agreed, and the respective designations come into force, most privately rented homes in the borough would be required to be licensed, irrespective of whether they are occupied as single-family homes or as HMOs..

Comments regarding alternatives to licensing

Theme	No. Comments	Council Response
A help line / reporting mechanism	21	The Council currently provides a telephone helpline and various reporting mechanisms, including a dedicated email, an online reporting form, and face-to-face drop-in sessions. However, the Council is aware that many tenants are too afraid to complain about the condition of their property due to fear of rent increases or even eviction. Through the proposed licensing, the council is able to adopt a proactive approach to tackling poor housing conditions and raising standards in private rented housing. This allows renters to become more aware of their rights and responsibilities and provides them with greater access to council services that can support them.

Theme	No. Comments	Council Response
The council should focus on targeting bad landlords rather than introducing a blanket scheme for all landlords	71	We recognise that many landlords who rent out properties in the private sector manage their properties responsibly, but there are landlords who are negligent and unprofessional. If the proposed schemes are approved, we will continue to use the regulatory framework provided by property licensing schemes to focus on those that do not comply with robust enforcement and will develop guidance material for both landlords and tenants to provide additional support.
Address Airbnb lets which cause ASB and nuisance to neighbours	4	Properties let through Airbnb are short-term lets and do not legally fall under these licensing schemes which applies to longer term rentals. However, Airbnb properties may require planning permission for change of use if the property is rented out frequently. The Council will respond to issues caused by Airbnb's, such as noise complaints using appropriate legislation.
Charge in response to bad standards or complaints from tenants	12	<p>Following an investigation, formal statutory notices can be served that require improvements to be carried out to a property. The Council imposes a charge for most formal actions under Part 1 Housing Act 2004 such as the service of an Improvement Notice or Prohibition Order. The Council can also impose financial penalties under the Housing Act 2004 as an alternative to prosecuting landlords where formal statutory notices requiring improvements are not complied with.</p> <p>Licensing enables the Council to adopt a more proactive approach and the imposition of licence conditions place additional obligations on licence holders in relation to the letting and management of privately rented homes. The council will work with landlords to achieve compliance where possible but will also use robust enforcement against wilful non-compliance.</p>
Encourage the use of letting/managing agents	3	The Council acknowledges that there are many good letting agents operating within the borough, but the council's experience is that the use of a letting agent does not automatically guarantee a good standard of properties. Through the proposed licensing schemes the Council will continue to work closely with all stakeholders, including letting agents, landlords, and tenants, to ensure the best possible living conditions. This includes enforcing regulations, providing education, and promoting best practices in property management.
Landlords are not responsible for tenant behaviour	56	The Council understands that it is the responsibility of all residents in the borough to avoid causing anti-social behaviour. The Council does not expect landlords to be responsible for the behaviour of their tenants. However, landlords do have obligations in relation to tenancy management which includes dealing with, including where necessary taking formal action, in respect of all housing tenancy queries. The Councils' proposed licence conditions supports a

Theme	No. Comments	Council Response
		framework within which the expectation is that Licence Holders comply with any imposed licence conditions following grant of a licence, which includes measures to prevent ASB as well as taking appropriate and proportionate action in response to alleged or evidenced ASB.
Make it voluntary	5	In the event that the Council decides to declare a new discretionary licensing scheme or schemes, it will be necessary for all licensable addresses to be licensed i.e. there is no legal basis on which an agreed scheme could operate on a voluntary basis. The Council did consider alternatives to large-scale licensing to tackle the evidenced prevalence of poor property conditions and ASB associated with privately rented homes including voluntary accreditation. The council remains of the view that rogue landlords are unlikely to attend/engage in a voluntary accreditation landlord scheme.
More support for landlords when dealing with tenants who damage properties or cause persistent ASB	8	The Council is committed to providing robust support for landlords, and we have several measures already in place to ensure this. Our guidance for landlords, available on the Council's webpage, provides comprehensive information and advice to landlords to support them in meeting their obligation to provide good quality rental accommodation for their tenants. In relevant cases, the Council will also provide further support for responsible landlords who are struggling with their tenants' behaviour and causing deliberate ASB. Through the current licensing schemes, a database of over 17,000 landlords and agents operating in Waltham Forest has been compiled, supporting better communication and engagement with the sector through a regular e-newsletter and a thrice-yearly landlords' forum. If the new licensing schemes are introduced, the council proposes to continue its engagement activities with landlords, with help and guidance for dealing with anti-social behaviour as part of the programme.
The Council should proactively enforce existing standards through random checks	5	<p>The Council has a strong commitment to proactive enforcement, as evidenced by our current licensing schemes. We have conducted over 8,000 property audits including targeted proactive inspections of addresses linked to non-compliant landlords and of unlicensed properties, taking action against those who refuse to license their properties. The Council will continue its proactive efforts in communication, publicity, and enforcement to improve poor property conditions and address ASB.</p> <p>The consultation pack sets out the objectives of the proposed schemes, including targets to inspect and improve sub-standard properties. Licence fee income would be used to ensure adequate staffing and resources are in place to achieve these objectives. Our licensing</p>

Theme	No. Comments	Council Response
<p>The Council should wait for the proposed change in national legislation which would introduce a national property portal</p>	<p>4</p>	<p>enforcement officers would continue to collaborate closely with internal departments and external agencies to achieve coordinated enforcement outcomes.</p> <p>The Council has carefully considered the proposals in the Renters Reform Bill to implement a Property Portal. While the proposed portal is a valuable tool for local authorities, it is not a substitute for a selective licensing scheme. In this regard, the council views any introduced Property Portal as supplementing and enhancing the regulatory powers afforded by property licensing, not replacing them.</p> <p>Selective licensing provides a locally tailored, systematic approach to improving housing standards. It is more than just a collection of information; it is a proactive means for local authorities to inspect privately rented housing without the need for tenant complaints. This facilitates targeted action where it is needed most, ensures property managers are fit and proper persons, and protects vulnerable tenants.</p> <p>The property portal will aid in the identification of unlicensed properties and inform landlords about local activities. However, it will not directly improve property conditions and management. Certificates will still need to be checked for accuracy, and landlords can opt out of receiving notifications from the portal, limiting its impact.</p> <p>The council has concluded that while the portal will provide a valuable source of information on the sector, a selective licensing scheme is still necessary. A scheme will ensure effective regulation and improvement of the private rented sector, providing a comprehensive solution that addresses the unique challenges of Waltham Forest. The Council supports the implementation of both tools in tandem to achieve the best outcomes for our landlords, tenants, and local communities.</p>
<p>Use existing powers</p>	<p>42</p>	<p>The Council has considered a number of other courses of action or alternatives to selective and additional licensing, but do not believe that, individually or collectively, they provide an effective, or as effective means of tackling ASB and poor housing conditions in the borough, or of delivering the scale of improvement that we believe is required in the PRS. In contrast to the conditions imposed on a Licence Holder on grant of a property licence, other existing powers do not place obligations on landlords/agents to proactively manage and maintain their rental properties.</p>

Theme	No. Comments	Council Response
There should be more policing in the borough to address issues with ASB	5	<p>It is not directly within the Council's control to increase policing in the borough, but it works closely with the police and other partners through SafetyNet, the borough's Crime and Disorder Reduction Partnership. The reduction of ASB is one of SafetyNet's key identified priorities.</p> <p>The Council has a dedicated ASB team, and a Private Sector Housing team, both of which work in close coordination to tackle ASB in the borough. The Council also collaborates closely with the police as part of a multi-agency approach to address significant ASB issues.</p> <p>For example, the council has worked with multi-agency partners on investigating and tackling brothels in the borough. As a result of the Council's Private Sector Housing Team's joint operations with the police and ASB team, a significant number of brothels have been discovered through visits to residential properties since the start of the previous schemes and these are now closed.</p> <p>Additional and Selective Licensing will enable the Council to encourage landlords to work with their tenants to reduce ASB. Information and support will be available both online and through forums.</p>

Comments regarding the proposed licensing fees and discounts

We have received a range of responses in relation to fees and discounts, including those respondents who considered that the licence fees should be lower and offered discounts higher and those who expressed opposing views. We have considered the representations and a summary of our response is as follows:

Our approach in respect of the proposed licensing schemes is that the grant of a licence would be subject to the payment of a fee. The proposal that was consulted on was to set fees for licence applications that took into account all of the Council's costs in administering and carrying out its licensing functions and carrying out its functions under Chapter 1 of Part 4 Housing Act 2004. The proposed fee structure was calculated on the basis that the schemes would be cost-neutral to the Council, with licence fees covering our costs of administering the schemes and meeting the stated scheme objectives.

The proposed fees were underpinned by assumptions about the level of income the fees would generate, based upon the number of properties that we would expect to be licensed during the life of the schemes and the proportion of those that will qualify for discounts. We have explained the basis upon which we proposed to offer the various available fee discounts.

We have benchmarked our proposed fee structure against other London Boroughs that have large scale licensing schemes, and we believe that our proposed fees compare favourably with these authorities.

Taking all relevant factors into account, we have decided not to make significant changes to our proposed fee structure. We have considered the representations made in respect of properties that have an EPC energy rating of C and we do believe that a case has been made for an amended fee structure to reflect the relatively good energy characteristics of such homes. We are therefore proposing that applications that relate to homes that have an EPC of C will benefit from a discount of £95 against the full licence fee subject to qualifying criteria being met.

We have been able to make the change to reduce the licence fees payable by landlords of homes that have an EPC of C through some re-modelling of the licensing fee income and the costs associated with the running of the scheme without any consequent increase in licence fees payable by the majority landlords who are not eligible for this additional fee discount.

Theme	No. Comments	Council Response
The fees are too high	217	<p>The licence fee structure has been designed such that the schemes will be cost neutral and will not make a profit. The proposed fees have been calculated based on the cost of setting up and administering the schemes and meeting scheme objectives. The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that we expect to be licensed during the life of the schemes and the numbers of those properties that we expect to be eligible for one or more discounts.</p> <p>The Council is committed to ensuring the fees are fair and proportionate, and they will be reviewed throughout the schemes to ensure this remains the case</p>
There should be a penalty for landlords who have poor standards	3	<p>Licensing enables the council to proactively inspect properties and find landlords who are in breach of licence conditions and are keeping their properties in poor condition. As seen with our previous schemes, we have a robust approach to enforcement against private landlords who fail to meet their legal obligations and were one of the first local authorities nationally to adopt new powers to issue a financial penalty of up to £30,000 under the Housing and Planning Act 2016. We are also a leading authority in the use of Interim Management Orders to control unlicensed privately rented properties. The council believes that the effective administration and enforcement of the property licensing schemes helps to create a level playing field with the very many responsible landlords who let out homes in the borough by disrupting non-compliant business models.</p>

Theme	No. Comments	Council Response
<p>The EPC discount for B and above properties is too prohibitive</p>	<p>53</p>	<p>The Council carefully calculated the fees and discounts based on the administration and enforcement costs associated with the scheme. We believe that properties with an EPC rating of B or above are generally the newer homes, such as delivered through build to rent schemes. As a result, they will be in better condition and less likely to have hazards such as damp, mould, and excess cold than homes with poorer energy characteristics. As a result, these properties will require fewer inspections and less enforcement action to ensure that property standards are met.</p> <p>Whilst we believe that it is right to continue to offer a significant discount of £295 against the full licence fee for homes that have the highest energy performance standards (EPC A or B) we have listened carefully to representations to the effect that applications that relate to other rented homes, which have a relatively good EPC energy rating of C, should also attract a discounted application fee. In particular, the council accepts that, given the relative old age profile of its privately rented stock, it can be challenging to achieve an EPC of B or above given the nature of the original construction and other constraints. The Council has therefore determined that, if the new schemes are designated, it will offer an additional discount of £95 against the full licence fee in relation to licence applications that relate to privately rented homes that have an EPC rating of C (subject to specified eligibility criteria).</p> <p>The aim of both the original proposed discount and the new discount relating to properties that are EPC C is to encourage property owners to improve the energy efficiency and overall condition of their properties, which in turn leads to a safer and healthier living environment for tenants. The discounts, particularly those relating to homes that have an EPC rating of A or B, also support wider corporate priorities in increasing the supply of affordable rented homes through build to rent and the borough's net zero ambitions.</p>
<p>Charities should not get a discount</p> <ul style="list-style-type: none"> - Being a charity does not guarantee being a good landlord - Some charities rent to their employees 	<p>18</p>	<p>The proposed relevant discount is not available to all charities but only ones that meet specified eligibility criteria. The discount is only available to charities, including almshouses, which provides housing that is:</p> <ul style="list-style-type: none"> o (a) let at below market rent and o (b) specially designed / adapted to meet the needs of disabled people, older people, or any other groups protected under the Equality Act 2010. <p>The offered discount reflects the fact that these organisations operate on a non-profit basis and the social benefits that they provide. As with all offered discounts, eligibility for one or</p>

Theme	No. Comments	Council Response
		<p>more discounts does not in any way lessen the need for the landlord and/or any appointed licence holder to comply with all legal responsibilities placed on them.</p> <p>We believe that a balanced approach, where we acknowledge the unique position of charities while ensuring they meet their obligations as landlords, is the most effective way to ensure high standards across all rented properties.</p>
There should be discounts for landlords who only have one property	17	<p>The offered multi-dwelling discount reflects the reduced administration costs to the Council in determining applications relating to properties within the same building under common management and control. Other discounts reflect the envisaged reduced enforcement costs associated with regularising conditions and management practices in eligible properties. The licence fee has been calculated to cover the cost of the administration and enforcement of the schemes and to meet identified scheme objectives. In common with all landlords, those landlords with just one property are able to take advantage of the EPC discounts if their rented home has an EPC rating of C or better and other eligibility criteria are met.</p>
There should be a discount for being a good landlord	17	<p>The Council has considered carefully whether a discount for being a ‘good landlord’ could be justifiable, we appreciate that good landlords may feel aggrieved at paying the same fee as those other landlords who do not provide high standards of rental property. The proposed licence fee structure has been designed such that licence fees cover the cost of the schemes on a cost-neutral basis, and we believe is one which is fair to all landlords. The Council’s intention is to use the regulatory framework provided by additional and selective licensing schemes to focus its efforts on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. We will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords to provide a level playing field for all landlords and to remove any economic benefit in non-compliance</p>
There should not be any discounts	20	<p>The offered discounts are designed to incentivise certain behaviours that align with our objectives, such as improving energy efficiency (EPC rating of C or above) or supporting charities who rent homes below market rent and who operate on a non-profit basis. The offered multi-dwelling discount reflects the reduced administration costs to the Council in determining applications relating to properties within the same building under common</p>

Theme	No. Comments	Council Response
		<p>management and control. Other discounts reflect the envisaged reduced enforcement costs associated with regularising conditions and management practices in eligible properties.</p> <p>However, it is important to note that these discounts do not compromise the standards we set for all landlords. Regardless of whether a discount is applied, all landlords are required to meet the same property standards and uphold tenant rights.</p>
The fees should be higher	36	<p>As stated above, the licence fee structure is designed to cover the costs of administering the licensing schemes, not to generate profit. The Council is mindful of the financial burden that a higher licence fee could impose on landlords. A higher fee might discourage landlords from applying for a licence, leading to non-compliance with the scheme. This could undermine the effectiveness of the scheme in improving housing conditions and addressing anti-social behaviour. The current proposed fees and discounts will allow the Council to effectively administer the scheme while ensuring affordability and encouraging compliance.</p>
There should be an early bird discount	8	<p>The Council has decided not to offer an early bird discount for the proposed new licensing schemes. This decision is based on the current policy that grants full-term licences for 5 years, the maximum period allowed (unless there is a significant reason for a shorter licence being issued). As a result, many landlords with licences issued under the current schemes won't need to seek a new licence until well into any future schemes. Therefore, an early bird discount would only benefit a small number of landlords with licences expiring at the start of any new scheme, which the Council considers impractical and inequitable. Further, and in any event, the licence fee structure has been calculated to cover the cost of the administration and enforcement of the schemes and to meet identified scheme objectives and the inclusion of an early bird discount would mean that the overall cost of a licence fee would need to increase in order to fund the administration and enforcement of the scheme.</p>
Discount for multiple properties regardless of location or not in the same building	4	<p>As stated above, the fee has been calculated to be as low as possible whilst covering the administrative and enforcement costs of the scheme.</p> <p>A discount has been proposed where multiple properties [flats] are in the same block or building and have common ownership and management control. This is due to the efficiencies in processing applications that relate to multiple units under the same ownership and control within the same building, which result in cost savings. However, these efficiencies do not apply when processing applications for properties located in various parts of the borough,</p>

Theme	No. Comments	Council Response
		even if they are owned by the same landlord. Therefore, it is not appropriate to offer the same discount in these cases.
Landlords could use the cost of the licence on maintenance of the properties	2	While it is true that landlords could potentially use the cost of the licence fee for property maintenance, it's important to consider the broader purpose and benefits of the licensing schemes. In particular, the proposed licensing schemes will ensure that all landlords meet a certain standard of property maintenance and management, providing tenants with safe living conditions and a recourse if standards are not met. The schemes will help to hold landlords to account for ensuring that their properties are effectively managed and properly maintained. Beyond property maintenance, the schemes also help to address anti-social behaviour. Without the cost of the licences under the proposed schemes there is no guarantee that landlords would indeed spend the equivalent amount on property upkeep. The schemes are designed to be cost neutral to the Council; without licence fees the schemes would operate as a cost to the Council.
There should be more discounts, for example for keeping properties in good condition or if you rent to certain groups, such as key workers	34	The licence fee has been calculated to cover the cost of the scheme and is designed to be as low as possible for all landlords. The Council has considered other possible options to discount the licence fee but does not intend to extend the discounts already proposed as doing so has the potential to make the administration and enforcement of the schemes financially unsustainable.
There should be fewer discounts	17	As stated above, the discounts proposed in our licensing scheme are not arbitrary but have been carefully calculated based on the administration and enforcement costs associated with the scheme. They are designed to incentivise certain behaviours that align with our objectives, such as improving energy efficiency (EPC rating of C or above) or supporting the provision of low-cost rental homes.
Disagrees with the multi-property discount	13	The proposed identified discount reflects the reduced administration costs to the Council due to the efficiencies in processing applications that relate to multiple units under the same ownership and control within the same building.
There should be one fee per landlord	5	The administrative work involved in licensing is related to the property rather than the landlord. This includes inspections, enforcement, and compliance checks, all of which are conducted on a per-property basis. Charging per property ensures that landlords with more

Theme	No. Comments	Council Response
		properties, which could potentially cause more issues or require more resources from the council, contribute based on numbers of properties licensed accordingly.

Comments regarding the proposed licence conditions

Theme	No. Comment	Council Response
The licence conditions are unclear and too complex	41	The Council believes that, whilst necessarily comprehensive, the licence conditions have been drafted with sufficient detail and clarity. However, the Council will work with any licence holders to help them to understand any conditions that are not clear to them.
Some conditions are covered by rental agreements such as holding a current gas safety certificate and ensuring smoke alarms are provided in the house and are kept in good working order.	4	<p>As part of the consultation exercise, the Council shared details of all licence conditions that it proposed would accompany granted selective and additional licences under any new schemes. These conditions included both mandatory licence conditions that national government has said must be included and local conditions developed by the Council, and are designed to set out all obligations, for example relating to the letting and management of rented homes.</p> <p>The licence conditions relating to Gas Safe certificates and the provision and maintenance of smoke detectors are amongst those conditions that central government say must be included as a condition of granting any property licence.</p>
What is the definition of quickly in terms of repairs	1	<p>The licence conditions do not include the term “quickly” in relation to repairs. The Council recognises that repairs can vary greatly in scope, ranging from minor to major repairs. The timelines will therefore be dependent upon the scale of works required to be undertaken.</p> <p>Where hazards are identified under the Housing Health and Safety Ratings System (HHSRS), and the council issues a statutory notice, landlords must comply with the notice and carry out necessary repairs to address these hazards within a specified timeframe. Time periods will be determined on a case-by-case basis but will need to be undertaken within ‘a reasonable period of time’.</p>
The inspection requirement is intrusive	3	The requirement to inspect HMOs every three months is in line with industry best practice. The National Residential Landlord Association, in their “landlord’s essential guide to periodic inspections” recommends that “the frequency of the inspections should be no less than every three months, to avoid harassment”. Inspections of properties where a selective

Theme	No. Comment	Council Response
		licence has been granted are generally required to be undertaken on a less frequent basis, typically twice each year. The Council considers that it is necessary and proportionate for a landlord to ensure that their rented home is inspected on a frequent basis to ensure that licence conditions more generally are being met and to facilitate early intervention were any issues are identified.
Minimum energy efficiency requirements should be added	3	<p>The Council has not added minimum energy efficiency requirements to the licence conditions as this is currently regulated by the Minimum Energy Efficiency Standards (MEES) Regulations. This requires properties to have an Energy Performance Certificate (EPC) rating of E and above before they can be let out. The licensing inspection regime will enable the Council to identify tenants living in homes with an F or G EPC rating and work with landlords to bring them into compliance.</p> <p>The Council is also seeking to encourage all landlords to improve the EPC rating of their rented properties by proposing a discount on licence fees for properties with an EPC of C or above.</p>
Fire risk assessment - there needs to be a sample template of the document that LBWF would like made available for landlords to use and / or approved providers	2	<p>Fire safety advice including fire risk assessments can be obtained from the London Fire Brigade website. https://www.london-fire.gov.uk/safety/the-workplace/fire-risk-assessments-your-responsibilities/</p>
What is the definition of “fit and proper” person	5	<p>The Housing Act 2004 requires that before a licence is issued the Council must ensure that the person involved in the management of the property is sufficiently competent, is a ‘fit and proper person’ and that satisfactory management structures and financial arrangements are in place for each rented property. This is further defined in sections 66 and 89 of the Housing Act 2004.</p> <p>In making our decision, we will consider all relevant information including any evidence that the person applying for a licence has (or where it is relevant to the question of whether they should be a licence holder been associated with anyone who has):</p> <ul style="list-style-type: none"> committed any offence involving fraud or other dishonesty, violence, drugs and certain sexual offences

Theme	No. Comment	Council Response
		<ul style="list-style-type: none"> illegally discriminated on the ground of sex, colour, race, ethnic or national origins or disability in connection with any business broken any housing or landlord and tenant law
Conditions should be added regarding addressing damp and mould	6	<p>By law the local authority can only impose selective licensing conditions regulating the management, use or occupation of the dwelling. The Court of Appeal has confirmed that licence conditions cannot relate to property condition and contents (Brown v Hyndburn Borough Council [2018]) although the Council has proposed a condition that requires regular inspections of the rented home be carried out to identify any management or condition issues.</p> <p>Under the Housing Act 2004 housing conditions are enforced through the Housing Health and Safety Rating System (HHSRS), landlords should ensure their property is free from hazards, including damp and mould, and fit for habitation. The Council assesses properties for these hazards and takes action where any serious issues are found.</p>
There should be more requirements for licence holders, including covering Airbnb's and the outside of the properties	20	<p>As stated above, by law the local authority can only impose selective licensing discretionary conditions regulating the management, use or occupation of the dwelling. Properties that are let as short-term holiday lets, such as through Airbnb, do not fall within the scope of property licensing provisions and any issues associated with such uses must be properly addressed through other legislative provisions such as planning.</p>

Appendix 1 - Responses to the Free Text Questions

A range of responses were received during consultation relating to licence conditions, fees and discounts, the designation area, landlord and tenant support, as well as more general responses (for both additional and selective licensing).

The following is the responses to the free text questions in the consultation online survey

Q11. Do you think the proposal to include 20 of the 22 Wards in the borough is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in a selective licensing scheme in Waltham Forest and why

- I don't understand why all wards are not included ?
- Bad landlords continue their bad behaviour whilst good landlords continue to uphold standards. Policing standards has only piled additional costs into honest landlords who are now forced to sell up resulting in ever increase in substandard landlords due to lack of competition.
- All wards should be included for greater simplicity for renters and landlords. The average resident does not know where ward boundaries are.
- All of the borough should be included in the licensing scheme - outrageous that landlords can escape regulation in two wards
- Imposing a fee on landlords makes absolutely no difference at all. The good ones pay and follow rules and regulations and keep rents low; the bad landlords don't care, don't follow the rules, and get away with it because they completely avoid the licensing scheme altogether. This is just another way for the council to make more money, look like they're doing something and pressurise good landlords to get sell-up to big corporations.
- Welcome Forest council, just making big money from the landlords.
- Chingford Green has very few issues compared to central and north areas, similar to Endlebury
- All of them.
- It does not seem appropriate to only include some wards, if the scheme improves conditions then it should be applied to all wards. I am a landlord and my property is well managed and in good condition, yet I must pay a large sum of money for a licence. This condition should apply to all landlords in the borough not just those in selected wards.
- There should not be a scheme it is yet another way for the council to make money,
- i dont think there should be a scheme at all - but you will go ahead anyway, so in that case its only fair to include all wards
- All wards should be included
- if wards are to continue to have exorbitant licences at all- ALL wards should be included - otherwise it's and unfair playing field for competing landlords
- They should all be included. Just because the other wards are in posh Tory areas does not make them immune from potential problems. If there are no rented properties there, fine, but if there are some they should be treated the same as all others in the borough in the interests of fairness. It makes you wonder who is influencing this policy.
- Selective licensing should be a tool to target specific problems in specific areas and should not just be applied widely
- The license does not prevent poor management or poor living conditions/standards , and neither does it restrict a landlord's ability to house multiple tenants illegally. The requirement for gas and electrical safety certificates ensures the safety of the property and the tenants. It is also extremely easy to rent a property without applying for a LBWF permit if done without the use of an agent, and therefore makes it nothing more than a tax on the responsible landlord
- I've tried looking at the supporting documentation. It is not clear. If you cant outline the reason in a short, specific paragraph then you are not communicating effectively. I cannot see your reasoning, but I am against "selective" anything. Either we are all in it together or we are not.
- I don't feel there should be any such scheme given since the introduction of this scheme in 2015, houses available to rent has dropped significantly as is evident by the rise in the queue for housing and evictions. The landlords who have vacated this area cites the bureaucracy of the council such as slapping a landlord with £5000 for a tenant placing rubbish ahead of disposal in the front yard. I have reduced my own holdings by 20 properties since and the remaining ones I am looking for opportune moments to dispose vacating the borough completely and relocating in boroughs where there are no such schemes or there was minimal interference from the council like in Tory controlled boroughs

Q11. Do you think the proposal to include 20 of the 22 Wards in the borough is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in a selective licensing scheme in Waltham Forest and why

- The only affect of this scheme has been ever rising rent. The landlords cite regulatory costs imposed by the said legislation in support of their decision to raise rent
- All
- It is not a comprehensive scheme
- All landlords within The borough should have a license. No one should be exempt
- I am not sure why Highams Park is excluded! Is this a political decision? If so, then no part of the borough should have to pay.
- None at all. Private sector landlords are not responsible for flytipping and ASB. The council has a plethora of other laws it can use against these crimes. Licensing is just plain and simply a money grabbing exercise from decent, hard working people.
- Analysis of areas where ASB problems are frequent should be included but the threshold should for inclusion be realistic and not based on infrequent occurrences. This will improve efficiency in the limited resources of council work force.
- It makes no difference if tenants are behind or do t pay their rent it makes no difference to landlords or tenants it is just a way to make money out of struggling landlord for the council To make money . End result landlords will sell their properties resulting in less rental Accommodation.
- No. All wards should be included.
- If you do implement a scheme, all wards should be treated the same way - especially as excluding 2 wards makes it look as though you're giving rich landlords a break.
- I think All wards should be included and there should be no exceptions.
- Include all
- I don't believe that this license changes anything. It is an additional tax for hard working landlords. All it does is take away funds that could be used to make improvements.
- It should be all of them for uniformity
- Whilst I agree with the principle of selective licensing, I don't agree with the explanation as to why 2 wards are not to be included within this scheme. In effect operating costs for landlords in those wards would be lower as they don't need to incur the license cost. The borough should apply the same licensing conditions equally to all rental properties across the borough - it then becomes an operational decision as to where to invest staffing resources for the conduction of inspections/compliance/enforcement etc.
- I think a much cheaper system needs to be devised. The last licence lasted for a maximum of 5 years and was £500. But since then taxes have increased massively and I'm renting at a loss. I can't afford £895!
- If you are continuing with the licensing which in my opinion is just a way for the council to make yet more money then all of Waltham Forest should have to be licenced
- It's not about the ward it's ab
- However LBWF should focus on actual evidence of wards where there are issues including ASB as not all wards suffer from this. This also implies that there are many rogue landlords operating and not managing as they should be.
- Licensing does not stop anti social behaviour or littering etc, private rented accommodation is usually professionals, it the council housing tenants usually the problems and private lettings used by the council for temporary housing etc that isn't licensed that has problem tenants. Licensing is just a money making venture . It's just easier to have a department wher tenants can go complain or neighbours etc
- Chingford Green ward figures are distorted by Enterprise House in Kings Head Hill. This is a charitable scheme catering for older people and doesn't have any of the issues the scheme is aimed at addressing.
- Spend your time going to restaurants and take away places as that's were we eat. Get more rubbish collected from houses and flats. Fly tipping is not because we are renting it's cause you lot don't collect the rubbish so people dump it.
- All
- Every property should be included.
- All wards need to be included, it is unfair that a few are excluded from the scheme.

Q11. Do you think the proposal to include 20 of the 22 Wards in the borough is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in a selective licensing scheme in Waltham Forest and why

- This increases rents and does not add much value as most landlords are very fair and have very good condition properties
- All wards should be included.
- Hoe street
- If we had more wards then surely the extremely high price would go down...it's only responsible landlords like myself that keep a good standard of property
- We all know its a money exercise license scheme. In 2019 the tenants did a runner owed me £7000 in rent arrears and on top of that the tenants totally damaged my property which cost me £22,000 pounds to fix and repair to make it liveable for rent. Could Waltham Forest Council could not help me to recover my rent arrears and cost of repairing the damage to my property by the tenants even though I had a property license.
- I think that all wards in the Borough should be included
- Walthamstow should be a priority for this work.
- The 2 remaining uncovered wards - they have ASB incidents surpassing or close to some of the wards who are covered (e.g. Valley) and the proportion of PRS properties is approaching that of Valley and Hale End wards. Feels like since almost the whole borough is covered, the remaining wards should be too and there is an economies of scale justification to that. Why not protect more people from ASB and bad property management?
- Cann hall
- I think all wards should be included. Responsible landlords with property in the 20 wards are being penalised for a geographical accident. The two omitted wards do not have zero ASB and poor quality rentals; just lower. What is being done to improve/enforce compliance in those incidents if they lie outside this licensing scheme?
- All Wards should be included
- All tenants deserve the limited protection licensing affords them, even if the ward they live in happens to have relatively low levels of hazard or ASB.
- I'm not clear why the two wards have been described as not eligible to be included in the scheme.
- All wards should not have a selective licence, Cost of the licence can go towards maintaining the property instead.
- This should apply across the borough.
- All wards should be included as this is a borough wide problem.
- Having a borough wide scheme sends a clear message to landlords and tenants that the borough take deprivation, property conditions and ASB seriously. It could be argued that all 22 wards should be included in the scheme due to the high numbers of persistent ASB which would ensure a cohesive approach to tackling ASB while promoting community safety and well-being across the borough. Without borough-wide coverage, problematic tenants might move to areas without licensing requirements, leading to the displacement of ASB rather than its resolution.
- Chingford Green should not be included
- How do you know there are no rented properties in the two excluded wards.
- if you are doing one ward why not the others- to create a level playing field
- None should be. It's a swizz. There are no decent landlords who are being penalised for others who provide shoddy housing. Crack down on them. How do you know why property is or isn't of a good standard?? Have you checked with my estate agent that manages the property for feedback? You'll find its exemplary.
- If you require scheme then explain why it's not done everywhere
- With the advent of the Renters Reform Act 2024, why will this be necessary as all info will be held on a portal, it will be doubling up.
- The Council could have a bigger impact on this problem if it introduced property checks for all housing where housing benefit claims are made. Tenants paying the rent themselves are less likely to be exploited than those who are having their housing costs paid for.
- All wards above

Q11. Do you think the proposal to include 20 of the 22 Wards in the borough is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in a selective licensing scheme in Waltham Forest and why

- The money raised through the scheme is not ringfenced for improvements; rather it is consumed by bureaucracy and has a negative effective on tenants rents
- None as it is only honest landlords that seem to comply and the ones that the scheme are meant to combat do not join the scheme.
- Waltham Stow Village. That area is quiet with minimum antisocial behavior.
- No wards whatsoever as rents are going up higher because of private licensing costs a number of my friends properties were never inspected waste of money for tenants as we in effect have to pay for the licence buerocracy as landlord increases the rent
- If you doing this, all wards should be treated equally.
- I think most landlords and tenants are well behaved, but making landlords pay for a license only increases rent for tenants to cover additional cost.
- Landlords using managing agents should not have to pay further for any licence schemes. This is just another tax on landlords where the cost just increases the rent that the tenants have to pay as the fee will simply be passed on. Bad landlords will always be bad landlords. This is just another money making scheme from the council. Landlords will be selling up soon and the council will not be able to cope with demand.
- The whole of Highams Park E7 north of the A406 North circular should be out side the control area .
- There should be basic licence to check gas safety,electric safety and valid etc. It should cost minimally because this cost will be passed to tenant and rents will go further up.
- If some owners have to have a licence then all owners in the area should be included.
- N/A
- I am a leaseholder of Waltham Forest Council I the council cannot meet its obligations as a freeholder, therefore it shouldn't put restrictions on landlords until can prove that it can meet its obligations
- No wards
- I don't understand why some wards have been excluded. And I think the cost of the service should not be shouldered by landlords at it in effect puts up the rent to the tenant when most landlords want to keep rents under control.
- The scheme is costly and has had no positive impact for me as a landlord or for my tenants. I am a good landlord and my property is maintained to a high standard. This is just another tax the cost of which I have to pass down to my tenants, making rent even more unaffordable.
- The licensing should only apply to HMOs where the standard of living condition, overcrowding, bad management and anti social behaviour is an issue. Private rentals by individual landlords are standard all across London, they do not create any more negative impact than the properties in other boroughs, but penalised only in Waltham Forest.
- Having read the consultation document that reason that the two wards are excluded from the proposal due to low private rented section (PRS), which I disagree with the reasoning, I believe all wards should either be included or excluded.
- It unnecessarily increases the landlord's cost which will be passed to the tenant thereby increasing housing rent
- i dont think there should be one... but if there is, then it should include all wards otherwise it is not fair. if they cant be included, then NONE should be
- The proposals for improvement via Licencing should be applied in all Wards
- You get good and bad landlords. Good ones will always comply and pay the price for bad ones who will not comply. Why do we still hear of landlord issues if these licenses are doing what they are supposed to. It's just an additional revenue.
- Less benefit to landlords who already have their rights curtailed and to put further onus on them when there is a shortage of housing is very poorly thought out.
- None
- I have had tenants that have treated my house like a home, they are not antisocial. When I was using an agency to rent out my house, they were prioritising families due to the licence scheme. avoiding three single professionals to rent my home. I dont think this is fair.

Q11. Do you think the proposal to include 20 of the 22 Wards in the borough is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in a selective licensing scheme in Waltham Forest and why

discriminating. I have always lived with friends and this seemed strange that the council was discouraging a three bedroom house, to allow three non related people to live together. Its cheaper for individuals to share a larger house than individually all have a one bedroom flat rented out. Some home owners are 'antisocial' and they do not need a licence to live in their own home.

- Why do whole wards need to be taken together? Some areas within wards, e.g. Walthamstow Village, do not have the problems you talk about.
- if not included, they will attract more badly managed property landlords and there will be an increase in problems for tenants and residents where there is little or no regulatory control
- all wards
- I cannot see the point of excluding wards and creating a postcode lottery as it would be a magnet for rogues to focus their attention there and will create a patchwork like the haphazard CPZ system that the Council seems to enjoy. No-one else does.
- The licence scheme has been running with back dated licences. That were issued years after the start date. They were not needed. It's clearly for revenue purposes only
- In the interests of fairness, this should cover the whole borough. Those living in properties in the wards excluded should be covered by the same scheme.
- All wards should be covered to safeguard future possible changes
- No wards should be included, as this reduces the supply of privately rented houses in the borough whilst responsible landlord's are leaving the market in droves due to extra costs from all angles.
- All should be included because every ward has rental homes and will have an impact to the local community.

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- Make them less restricted and easier/cheaper to access.
- Find the police adequately. Reward landlords that go above and beyond in providing superior housing.
- I'm not sure how charging more money to private landlords reduces anti social behaviour. The only thing it achieves is pushing rental prices up and therefore getting tenants in who are on high income salaries.
- They need to clamp down on beds-in-sheds that litter the borough first and the numerous cash-in-hand businesses; these are often the places where there are terrible residential premises linked to the individuals and businesses,; they're all part of the same scam: bring over lots of foreign workers, pay them cash-in-hand via a cash-in-hand business, put them up in a hovel or a shed that you build in your back garden. Meanwhile, good landlords are getting punished and interrogated by the local council to ensure they follow the rules. It's turning a blind eye to the real problem while openly and visibly punishing the good landlords.
- I do not believe selective licensing is the answer. Law abiding landlords will comply. You will make money from them. However it's the rule breakers you should be pursuing and they are most likely to evade and not sign up to and pay for a scheme. Spend more time finding the rule breakers and fine them to raise revenue.
- A scheme that doesn't charge landlords and tenants (by default). If it's a stat duty then council should pay for service via council tax like other stat services.
- Landlords are usually responsible and many Local Authorities do not have to resort to such intrusive schemes. However I tend to agree that HMOs should be regulated, but not to private renting.
- The majority of landlords are good landlords who look after their properties and tenants. The council could concentrate their efforts on finding landlords who do not follow good standards even when a licensing system is in place.
- It is always good to consider alternatives and to ensure landlords who own well managed properties are not paying for those landlords who do not manage their properties appropriately.
- The landlord should be held ultimately responsible. We had one flat on our street where the landlord didn't care who rented it and it ended up being a drug house. We struggled to do anything about it since the landlord had no incentive to solve the problem
- Voluntary accreditation for discounted services
- unrelated families (single parents with kids and parents needing looking after) might decide to live together to get access to a larger properties - alternative relationships need to be taken in account such as friends moving in together to cover rent cost
- I think unless the council receives complaints about a property the landlord should be left alone. Guidance could be sent out each year for good landlords to comply with. MOST would and use the ridiculous licensing fees to improve their properties and safety!!! If there is a rogue landlord let the council implement sanctions on them until they comply!
- The licensing scheme has driven out good landlords such as ourselves (as a group of family companies we have sold 35 units since licensing was introduced) but has done nothing to remove or improve poor landlords particularly in the HMO sector. We have never been asked to upload evidence of annual certification so unscrupulous landlords imply submit the initial evidence but do not bother with annual inspections. I speak as a Chartered Surveyor who was a Director of a surveying company with a large management. Licensing also forced one of our largest landlords (Glasspool Trust) who offered subsidised rents, to sell their estate into the private sector and looking at those areas the licensing scheme has had a significant negative impact. As an alternative I would like to see government legislation requiring all lettings to be via a registered agent who is then responsible for ensuring compliance with an agreed set of standards.
- Spot visits or requests for paperwork rather than a licence which is not utilised or visited, only uses paper to determine if the house is fit for purpose not reality.

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- The issue is with rogue landlords. Most landlords are decent people who care about their properties and tenants
- Landlord paying the extortionate fee and burden goes on to tenants and rent will go up
- council/police should deal with issues as they arise themselves and not try and off-load responsibility to landlords.
- I rent out one property that I previously lived in. I have always kept it to a high standard and applied for the property license. The license took months to be granted, and I was told tenants could move in before it was issued. Not once has anyone from the council contacted me to arrange a visit or inspection. Therefore in my own experience, I can not see how this license is helping drive up standards, but instead is another deterrent for people like myself who offer very good properties to renters.
- the landlords I know are all very responsible but when their tenants have bad neighbours the police are not interested neither are the Council
- A licensing scheme penalises good landlords by making them pay to be licensed. So it is only a financial penalty with no gain. Random checks of landlords could be carried out for example and powers used to enforce changes where they are not meeting regulations for example.
- Selective licencing seems to penalise good landlords and push additional costs and administrative burden whereas bad landlords just ignore licencing requirements. More should be done to specifically target bad landlords.
- This is not strictly a housing issue to be solved by landlords as the licensing has no impact on a tenant's behaviour whilst renting from a registered-private landlord. Unfortunately this is more a wider social issue and part of the wider housing crisis in the uk
- There should be a scheme to effectively punish both landlords and tenants if they fail to meet their obligations. That is landlords who do not maintain their properties to a decent standard and it should be possible to very quickly remove tenants who fail to look after the place they occupy or do not pay their rent.
- The laws that existed for environmental controls and landlord and tenant acts etc. were sufficient without the need for Housing Act 2004. All the Housing Act 2004 has managed to achieve is increase the cost to landlords resulting in increased rents for tenants due to landlords vacating the business due to regulatory harassments and threats of fine up to £30000 or even criminal prosecutions. It has made being a landlord in WF akin to running an Investment bank!!!
- Health and safety inspectors powers are sufficient to ensure property living standards.....licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- This is simply a way for the council to take more money off people. I have seen absolutely no evidence that the current licensing has made any positive impact. This should also not be a blanket charge, penalising good landlords for the actions of the bad
- Proof of management to achieve your outcomes or a council tax levy is payable
- More inspections
- Punish the culprits not everyone. Why should i pay for a licence when our standards are high. If people misbehave they should pay not everyone.
- An alternative must exist that is cheaper than what it currently costs each land lord. I'm not against the scheme, I just think it is very expensive.
- Licensing scheme costs landlords money which they put onto tenants
- Good landlords are effectively paying a tax to allow the council to deal with bad landlords. Ultimately the tenants pay as most landlords will have to pass on the cost. I think more effective use of the current laws would be better.
- The council cannot deal with the state of their own housing so its rather hypocritical that you are trying to manage the private rental market, if landlord are being regulated then tenants should have the same treatment. My property had been ruined by the lack of care

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by tenants and caused me more financial costs time & effort. At the same time law is on tenants side allowing them to keep pets etc, who is paying for the damage they cause to the house and furniture?? & obligated to have tenants on benefits who is going to pay the rent when they fail to do so. Gave the council as a landlord choke does not help matters. The ownership & management should be the responsibility of the landlord and landlord only. There are so many regulations by law that the landlord has to adhere to & all tenants know their rights since they have the most rights. I am sure they will raise issues & take matter further without council interference. The council has been of no help with me when my tenants have damaged the property and encourage tenants to stay in the property even when they have been served a section 21.

- the scheme is too expensive for landlords. The renters should be charged - it is they that cause the problems.
- I don't believe that privately rented housing is the sole cause of littering, poor housing and anti-social behaviour
- You have enough legal power. Without adding extra costs that just lead to high rented got thf local tenants.
- The council licence scheme is designed for action against landlords it has zero impact or design to tackle fly tipping, anti social problems etc there should be an alternative set up that only HMO should be licenced and any other properties should be on a list so that can be monitored but only for a nominal fee
- ASB is a Borough wide problem and there is no direct relation that I know of to privately rented properties. There may be a correlation between HMOs and ASB but I do not think there is a causal relationship.
- I think the current government regulations are sufficient to ensure that private sector rent is properly protected from poor conditions and safety. The proposed licensing is just a nother source of income to the council that will end up being paid by the tenant. The land lord will pass the licensing fee into the tenants by raising the rent. It is better to support the tenants by not increasing the cost to the landlords as it is already very expensive to get into the private landlord business. The cost of borrowing and repairs and insurance has all gone up in the last two years while private tenants are not able to pay the rent due to the higher cost of living.
- Selective licensing penalises "good" landlords by making them pay the costs of policing "bad". The council should adopt a scheme funded by those at fault i.e. through enforcement penalties
- I think anti social behaviour and property rental are two different things. Surely there are powers to crack down on anti social behaviour as it is? eg police, fines etc. You don't have to rent to be anti social!
- It annoys me that I have to give the same information for each property I own. And I have to pay three times for showing that I am suitable to solve your housing problem. Obviously, I try to get back the costs from the tenants because these costs are clearly and exclusively related to letting out the properties. As summary, annoying duplication of work and increased rents. Great work!
- There should be checks carried out periodically and landlords be given ratings, just like food hygiene ratings. Poor ratings equal time to improve or fines or ban from renting out properties.
- There is no point having a licensing scheme if there are insufficient inspectors to ensure proper implementation by landlords and managing agents. I was advised by my managing agent not to worry about the licensing conditions as Waltham Forest don't check anything. And that Newham was better and "hot" on this. Needless to say I changed my managing agent. As, if he is sloppy on licensing he is likely to be sloppy on managing my property properly. So either staff up or change the system.
- Majority of landlords are responsible. The council already has powers to use against sub standard housing. Using the existing powers is what we taxpayers have already paid for

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- ASBs and Section 1 but have some way of enforcement with the landlords who do not support measures or maintain their properties.
- through council Tax and voting registration.
- Respond more effectively to actual complaints instead of causing good landlords lots of unnecessary expense which is then handed onto hard pressed tenants. Less tick boxing.
- A similar scheme but with reasonable rather than the excessive fees proposed and have been charged in previous schemes
- You can obtain a database of addresses by looking at housing benefit data and council tax data where there are frequent account changes. No need to charge landlords £900 per property. It's a revenue generator, as I'm sure you know
- Use the courts for breaches of the law giving warning if need be to the landlords to improve properties if they are unsafe. Licensing doesn't work, just creates extra cost and administrative burden that results in either demand for higher rents or less places to rent which also leads to higher rents.
- Set up a register of landlords (free of charge or a small one off admin cost per landlord, not per property) and set up penalty charges for landlords falling below standards. Don't just financially grab money from every landlord, good or bad. I would rather spend the £550 fee on maintaining the property.
- target problem landlords who will not register for selective licensing in the first place, selective licensing will only stop good landlords from investing in Waltham forest and existing landlords to sell up due to high mortgage costs & high selective licensing costs basically you will lose existing & new landlords leading to a higher temporary accommodation bill for Waltham forest
- Use the existing legislation, poor landlords will ignore the licence conditions anyway
- Use your common sense if something isn't working
- see comments to q11
- Tenants have all the power it takes years to tackle the problem then they plead Mental health issues and they stay in the property not paying rent doing what they like in regards to antisocial Behaviour and litter .
- What alternatives are there?
- If a landlord is bad they should be targeted through the tenants , not all landlords need to go through the licensing process
- There should be a good tenants list, this will ensure that those that are know for causing ASB are not permitting to continue to do so in the Borough - implementation should be Borough wide
- A license has nothing to do with anti social behaviour. You should publicise neighbours reporting and then enforcement by council officers. How is a license connected to tenants behaviour?
- ASB is an issue and I feel as a landlord if the council have controls and measures in place to improve that, it helps me as a landlord and my neighbours and community.
- If it is a fair and supportive system to help landlords then yes. At the moment, every license in place is there to give difficult tenants free rein to be difficult, damage properties and get away with it.
- Yes. Check for gas and electric safety certificates only with landlords.
- No fee licence.
- Rogue landlords work outside all normal rules and regulations. As usual with this type of scheme it is those that follow the rules that are involved. I is often housing associations that are cited in serious issues.It makes no difference to those who operate outside the rules and they are the ones with the issues. the pressure on good landlords with mortgages is now so high that many including me are looking to sell-so increasing the shortage of rentable housing.

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- A simpler paid registration scheme that identifies all landlords and requires provision of evidence based quality standard information . Managing agents to provide quality standard assurances as part of letting checklist
- I do not think the selective licensing scheme is effective or fair. It penalises good landlords, which make up the vast majority of all landlords. Get the bad landlords to pay for a scheme through fines but stop adding to the burden of landlords. If the council wish to improve housing they should begin with their own housing stock first.
- The government is now going to instigate a NATIONWIDE portal for this purpose so licencing schemes are not needed and add unnecessary costs to landlords.
- Existing powers are completely adequate
- The Council seeks to give itself (again) sweeping powers (at considerable expense to landlords and ultimately tenants) which impose conditions on all rented property rather than responding to specific complaints. As the consultation document sets out, there are other powers for dealing with problems without imposing expense and admin on everyone.
- The issue of short term keys is not specifically covered under the current licence. An Airbnb type property is technically exempt as stays are usually less than two months. However this is a real problem for neighbours as the guests have no interest in community relations and are careless with recycling and other issues. As long as LBWF does not explicitly cover these properties in licensing there will be more and more of them, further reducing the availability of properties for long term residents. We live below a flat being offered on Airbnb and booking.com. They make our lives a misery: criminal activity, damage to our home through overflows in bathrooms, noise throughout the night as guests are on holiday so don't have to get up for work. It's horrible and whenever I contact the LA they say it's not their remit to hold the landlord to account.
- I think a much cheaper system needs to be devised. The last licence lasted for a maximum of 5 years and was £500. But since then taxes have increased massively and I'm renting at a loss. I can't afford £895!
- Confidential hotline for issues. Help landlords by not advising non-paying tenants to stay put.
- You need a way for people to complain about landlords -a helpline. Because usually one bad landlord will have have several properties and there will be a pattern amongst his tenants as he probably doesn't care who he rents to and isnt very discerning. He also wont care about complaints from neighbours as he sees it as not his problem. He also wont get a licence anyway. The landlords who have licences are the ones who are decent landlords who look after their tenants.
- I think that Landlords that use letting agents should not have to pay the licence fee as apart from the fact they are already paying fees each month the properties are inspected regularly in accordance with Letting Agents rules. Maybe Letting agents should be given more authority, if a property is not up to standard LA should be able to report to the Council. In my opinion Landlords have not been helped by the Council in WF and all help is for the tenants. In 5 years I have had 2 bad tenants that destroyed my property, the last one sublet it and it has cost me thousands and put me in debt to get it back to a high letting standard, the Council were not in the least bit interested and its very wrong. Like myself, many Landlords are now considering just selling up which will cause even less properties for rent.
- consult with landlords more
- As a landlord we have complete control of the condition of the property and the process used to acquire good tenants. My concern is pushing responsibility too far into the landlord's court will lead to license revocation for something not necessarily in their direct control. Whilst I support selective licensing, I do worry about how anti-social behaviour will impact my ability to be seen as a good landlord.
- Voluntary opt
- Present powers are not strong enough and council lacks resources to implement sufficiently to reach the improvement needed, need to push government for additional resources, landlords are getting away with poor conditions and terrible management.

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

Managing agents should be fully vetted and qualified as well as inspected to ensure competence.

- Landlords should all use a letting agent as it helps solve problems between tenant and landlord. They also keep up to date with all legislation and references of tenants. If they collect the rent then pass on to landlord they are more in control.
- Landlords will find it difficult to manage out ASB and it's unfair to expect them to do so. There are systems you have in place that perhaps need more resources to tackle ASB or similar in problematic areas. Accessibility and response from your teams would be a good start.
- Yes have a specific department, once a complaint is made work with the tenant , landlord (which maybe the council themselves) and give notice . You can't hold the landlord responsible for tenants actions, as when landlords try to evict the tenants it's the system that makes it so hard especially those who will end up going to the council for housing. Tenants are told to stay in the property until the bailiff comes and kicks them out, including not paying rent until then.
- Licensing pushes up rents and discourages landlords entirely. My relative who owns properties for rent in LBWF is gradually selling up entirely.
- It should rely on public health legislation and act when tenants raise issues regarding the condition of their home.
- Stop bothering people, we are not stupid when we go rent our flat. We are more than able to do things ourselves. Concentrate on other stuff that needs doing.
- A help line
- Depends where there are problems that are ongoing historically. I think it should also be based on individual landlords who have been checked and are regulated every 6 months to ensure they are meeting the expected standards of renting their properties.
- ASB is above all the responsibility of the individuals concerned. A landlord has limited powers to affect ASB except the draconian option of terminating tenancies. The Council should work with the police and justice system to give a higher priority to the prosecution of ASB offences.
- Individuals should be accountable and liable for their own behaviour. It is their responsibility. Not the responsibility of a landlord.
- Landlords need to be held accountable for anti social behaviour in their properties, otherwise they won't vet potential occupants.
- Remove licence, it's just another way to get money it improves nothing.
- Each house on its own merits. My tenants (non-HMO) are very happy. They have lived in the house for 14 years and the only rent increase was in 2021 when Waltham Forest imposed the licensing fee.
- The licence scheme is pointless - the good landlords sign up & abide by the rules, the dodgy ones ignore it. £13million + has been raised by the scheme (based on average licence cost of £600 each and 22,000 licences granted). Where has this money gone? Enforcement is lacking and only the very worst landlords are ever prosecuted. Scheme also favours large scale landlords who are offered discounts - the landlords with 1 or 2 properties are much more likely to be decent and care about their tenants. Schemes like this punish the good people and don't do anything for the bad. Some of the worst properties in the borough are council owned and run - does the licence scheme enforce against them?
- This licence is very restrictive no help to good landlord at all ..it good landlords paying for bad landlord I am a tax pay in E17..why should I pay directly to pay for bad landlords.. this should all be covered in the council tax..why do I as a good landlord pay twice!(
- Get rid of the licensing scheme altogether
- There should only be mandatory HMO licensing like all the other London boroughs you have quoted in your document. Additional HMO licensing for over 3 unrelated people if

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

deemed necessary and you can prove any impact on housing conditions. This should covering the entire borough.

- Tougher/more frequent inspections. Following up/responding to reports of anti-social behaviour. Discourage houses of multiple occupancy. Clamp down on multiple vehicle registrations in one property, should be maximum of 2 per house.
- I dont object to a selective licensing scheme but I object to the proposed conditions which are oppressive and are one reason why I intend to sell my property this summer rather than let it again. The conditions and the level of the fee would certainly discourage anyone going abroad for a year and considering letting their property while they are away from letting it out. In particular, the whole tenor of the conditions is more suited to a HMO where the landlord retains possession of the common parts of the house than to the letting of a whole house to a single household where under a standard tenancy agreement the landlord has limited rights to enter the property. Clause 26 imposes a strict liability obligation not to employ a builder with a past history (how is the landlord to know this? If this should be there at all it should be a reasonable endeavours obligation, and maybe there should be a period beyond which one need not enquire -- as the conditions stand, if the builder was found not to be a fit and proper person in his 20's and is now in his 50's and entirely respectable and responsible, the landlord is still in breach. If clause 36 should be there at all it should be in terms of reasonable steps to ensure. And so on.
- Any serious issues should simply be put into writing to the landlord who will have a time limit to resolve the issue otherwise face a fine or court procedure.
- The stick approach is driving landlords out of the borough and reducing housing stock available to rent. A carrot approach would be far more appealing.
- Social housing that is genuinely affordable for all those on low income or who are long term sick - not just families. The Leyton development is unaffordable for most already living in the borough and has placed further strain on existing facilities and services, eg the tube station.
- Engagement with landlords that fail to maintain properties, needs to be more robust. As people are struggling to get repairs carried out and landlords are threatening eviction if tenants make complaints about their living standards. Tenants need more support and safety measures in these situations.
- More police
- Set up a reporting scheme for tenants and any other member of the public to report concerns or whistle blow on concerns. The cost of the licensing scheme is extortionate and adding to the increasing cost of rental.
- Landlords should be asked to self regulate their properties by completing an annual submission. License costs are passed on to tenants and increase rents
- All rentals banned
- Rogue landlords and bad tenants should be dealt with accordingly with fines.
- A helpline for tenants to report a property in bad order and also for ASB to be reported with any evidence submitted. Warnings and then finally enforced evictions issued if behaviour doesn't improve.
- Perhaps only require licences for properties against which complaints are upheld. Why make 'good' landlords pay additional fees
- Set minimum standards in consultation with Landlords and tenants. Stop making this a money making scheme for the Council
- A dedicated complaints line or email for the council to deal with
- Deal with the offenders directly. How can a landlord be penalised for the behaviour of adults who rent his property. The police and SNT should deal with what is effectively a crime.
- It's not landlords' roles to have fully worked up alternatives when, in many cases, (inc mine), we're just accidental landlords trying to do our best. I see from the corporate perspective, that a scheme needs to be imposed and managed in order to address less

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

responsible landlords and poor quality accommodations. However, from an individual (good) landlord's perspective, there seems to be no benefits. Before the current scheme, I tried to be a good landlord just out of a moral imperative, so the only impact of the scheme for me is only that I've had to divert revenue to pay for it. There's no 'quality mark' to promote to potential tenants or any other tangible benefit; just hidden costs to benefit the greater good.

- There is a big difference between renting out a single property compared to multiple properties in that the landlords with multiple properties treat it as a business not looking after the wellbeing of the tenants. People with one property should be excluded because their intentions is to have the property for pension purposes or leaving it to their children so they have an invested interest to look after the property and the tenants.
- Allowing tenants to give feedback direct to the council on property conditions
- Need a specific approach to short term lets. Our street has awful problems with Airbnb type guests.
- The anti social behaviour should not be the responsibility of the landlord. Just like the council have powers to tackle Asb by owner occupied properties, they should also have the powers to hold the tenants directly responsible for asb. Landlords are already having their power diminished by not being able to evict tenants so why should they be held responsible for asb by tenants?
- I don't believe the current scheme is enforced in any way that actually improves anything for tenants. I believe its primary role is to simply raise revenue.
- This is just a tax on good landlords that provide good standard housing to fund the larger enforcement department, you should finance yourself by issuing CPN's to those that poorly manage their properties, and offer sub standard accommodation.
- All wards should not have a selective licence, Cost of the licence can go towards maintaining the property instead.
- You need a scheme that ensures that all landlords are not voluntary registering as landlords. You rely on good will. It would be easily remedied by putting a tick box on the council tax asking if the payee is renting or the owner of the property and ban landlords from paying bills the tenants should have to register for council tax. Then you can cross reference as to who owns and who rents and is there a licence ? It is unfair on good landlords who provide good comfortable homes and comply with the borough's licence fees and others do not because WF has no way to enforce it.
- Need for a long term policy looking at what is required in the longer term and not over populate any area plus including Council properties with those who do not comply paying so encouraging landlords to maintain and improve properties.
- The most robust and proactive alternative would likely involve a combination of strategies tailored to the specific needs of the community. This might include: 1. Enhanced enforcement of existing regulations: Strengthening enforcement efforts to ensure that landlords comply with current housing standards and regulations can help improve property conditions and address anti-social behavior more effectively. 2. Community engagement initiatives: Engaging with residents, landlords, and local organizations to foster a sense of community ownership and responsibility can empower stakeholders to collaborate in maintaining safe and vibrant neighborhoods. 3. Targeted support for landlords: Providing resources, training, and incentives for landlords to maintain their properties to a high standard and address tenant behavior issues can help prevent problems before they escalate. 4. Data-driven decision-making: Utilizing data and analytics to identify areas with the highest incidence of anti-social behavior and property management issues can enable the council to allocate resources more efficiently and target interventions where they are most needed.
- Inspections, not licenses. More rights for tenants to raise issues. Properties to voluntarily have a certified status from the borough.
- The onus and cost should be on tenants, not landlords

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- Selective licensing should not be necessary should property ombudsman for landlords be instated as both do the same job
- The council are not proactive when helping landlords or tenants deal with antisocial behaviour or fly tipping/dirty gardens etc. a landlord has no power to enforce improved behaviour, either from their tenants or any neighbours responsible. So how exactly is the scheme empowering either tenants or landlords to improve these aspects ??
- Have a dedicated team to address any issues instead of wasting time and money on selective licencing. The reality is as landlords any cost does get passed onto the tenants sooner or later.
- The provision should be managed by the council departments and different teams. We should not have to pay a fee. This license and fee is unfair for good landlords.
- There should be tougher penalties for people who own and rent dangerous overcrowded property not penalise good landlords
- Stop treating landlords as cash cows, the selective licensing is a big tax grab. This has not helped anti social behaviour or any other issues in Waltham Forest. Waltham Forest council has not assisted landlords at all in tackling anti social behaviour and other related issues. This scheme is causing more problems and financial difficulties for both tenants and landlords.
- This should be only for a landlord who has several properties, not just one property. I have seen landlord renting spare rooms told to make HMO licenses for spare rooms.
- It's quite confusing the license that you need, as if you let your house to a family one year and then that changes to Sheraz, then you need to change your license. I think they should be something where you have a flexible license and it covers the majority of different people/groups as everyone needs to be catered for, it's quite difficult to find a suitable rental property these days due to costs landlords need to maximise how much rent they receive as a result of additional costs coming from licenses that they need to. On the whole, there are quite a good amount of professional landlords out there. There's a few who spoil it for the many.
- selective licensing is a reason i would sell a rented property and concentrate a landlord portfolio in an area where i dont get the extra grief and harrasment from a council re issues that are not the landlords fault... yet the landlord gets drags into it - enough to make you want to sell - and deal with more reasonable councils who do not threaten you unescararily and create a hostile environment in which to opertate in.. the council should deal with the tenants directly as they would a home owner being anti social - there are enough landlords selling up due to extra hassles they face from being dragged in by councils .
- I do not believe that it is necessary to have the Selective Licence Scheme in place for you to enforce legal requirements in relation to living conditions for Tenants nor should it be required for effective anti-social behaviour.
- Which doesn't cost nearly £900 to attain the licence and this is complete waste of money as requested items are covered when renting house under tenancy regulations ..this is additional Biden on landlords as they already have to all items in place if they have tenancy agreement
- Renters Reform Act 2024
- A tenancy adjudication process, similar to small claims court
- Improved data analytics cross referencing electoral role / housing benefits claims / council tax records to see if the occupancy. Housing benefit applicants should have a visit from the council to check the house is of an acceptable standard.
- Respond / enforce complaints by tenants. Much more focussed on bad landlords
- Fine the Landlords or tenants that are at fault with having persons living in their property with anti-social behaviour.
- From my experience as a landlord and from previously living and working in the LBWF involved in criminal prosecutions in the borough at summary jurisdiction, the main issues

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

relate to general tenant behaviour and social issues rather than deliberate direct action or inaction of private landlords. Most private landlords want to have good property and good tenants with trouble free tenancies and regularly paid rent. Private landlord licensing is yet another burden on landlords across the board and not directed at those few landlords who need attention and action. Prosecutions are expensive and often ineffectual. A more targeted approach to those responsible for poor housing and lack of supervision of properties may have a greater effect and prove less costly to the borough. Blanket licensing generally across the country isn't showing significant improvements. I'm not convinced selective private landlord licensing is the best way forward.

- None as it is only honest landlords that seem to comply and the ones that the scheme are meant to combat do not join the scheme.
- Using more CCTV cameras and take anti-social behavior seriously
- A scheme where landlords/ agent can submit all the same property information currently required for a selective licence and only pay a nominal admin fee. AT THE MOMENT WE ARE GETTING RIPPED OFF BY THE COUNCIL
- Council housing on rough estates on the borough have far worse anti social behaviour
- The lincensibg fee is a tax and does not regulate housing Accomodations. Rented homes in certain parts of the boroughs (affluent and quieter parts of the borough attract less rent-central walthamstow has higher rent so to charge the same for all properties regardless of the location is outing landlords and renters at Rick of higher rent which is unnecessary. There is higher cost of living and asking landlords to pay more for a lincense is unfair. Landlords with properties in certain parts of the borough look after their properties and should there for not be pinalised. I propose that a surgery or a data analysis is done on which parts of the borough has the most negative reports about rogue landlords and the areas that come up on top should be paying for a lincencing fee. Also if a landlord has been renting in a particular home for 5 years or more and there has not been a report on antisocial behaviour etc they should be exempted from paying the lincense.
- Property inspections
- Yes if this solution is going to cost landlords over £800 per licence. What is this for? I'm the one who has to implement the higher standards!
- This is a scheme to rib landlords of any cash left over.
- Not all landlords need regulating. There is existing legislation you can use to prosecute rogue landlords particularly in the HMO sector
- React to real time complaints and have an enforcement team in place
- The main problem appears to be with HMOs. I believe a licensing scheme should remain in place. For selective licensing possibly a points based pass system could be implemented.
- pay attn when rogue landlords and houses are reported. Also even though it's been built/renovated that way - it does not make it ok to stay that way. Cheap rents in Poor quality housing brings in the wrong kind of people and is also not kind to them
- Making houses with less than five occupants part of the additional/selective licensing system is discriminatory to individuals who are not in couples or families, who cannot afford to live in a house with one other person or less. Young professionals, who house share, have every right to live in the borough. Pulling Two storey houses with four sharers or less into additional HMO licensing is creating a shortage of housing for young professionals and ramping up rents for them. The privileging of those who have sex with each other, are married, or those with children is not fit for the modern age and does not reflect how an increasingly number of people live.
- Anti-social behaviour is got nothing to do with selective licensing. Anti social behaviour is exist within the council own flats so stop this licensing nonsense and let us breath a bit. Stop this triple taxing those landlords who are trying to help you serve people who are trying live in peace and harmony, please.
- Landlords themselves should be licensed, not individual properties. Licensing individual properties is largely a money-maker and does NOT address the problem of unscrupulous landlords. If every landlord was licensed - based on their properties but not the properties

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

themselves - that would prompt a register for people to choose who to rent from, and supply a further assurance for tenants

- Enforce harsher penalties on those that are not compliant. Stop punishing good landlords.
- The local authority does not require a blanket fee paying scheme, which has at best marginal benefits to those who have to conform and pay the fees, to control 95% of the landlords in the borough. The local authority already have those powers under existing legislation.
- Current housing legislation is sufficient
- I believe that the selective licensing scheme is good to capture relevant documents. However, the cost associated is far too high. Many landlords are exiting the market due to the enormous costs associated with renting their properties. In order to maintain a balance of well maintained rental stock and lower rents for tenants, landlords overheads need to be taken into account. In principal licensing can be positive but only if the associated costs are significantly lowered or indeed removed.
- Anti social behaviour of tenants should be tackled by fining them also if in receipt of housing benefit they should get it reduced
- Ideally, the council should be providing housing for those who want to rent or have to rent. There would be vast economies of scale possible in the building and maintenance of the properties and security of tenure for residents.
- There should be Wider promotion of voluntary accreditation schemes, which would delineate badly managed, low quality properties from well managed, high quality properties, thus incentivising both tenants from outside the borough from moving into Waltham forest, while reducing demand for badly managed properties. This wouldn't preclude the council from enforcing any of the other alternative measures listed in the questionnaire.
- Any alternative that doesn't hit those landlords who do the right thing anyway. Costs of the licensing scheme, which are pretty high, are getting passed on to tenants, particularly given all the other rules, regulations and tax hits on landlords.
- Be less confrontational
- To avoid repetition I have outlined these in Q26 at the end of the consultation.
- Only charge those properties who don't meet the criteria, for renting out private properties, and not those landlords who provide high quality residences.
- It is not the landlords responsibility to deal with the severe social problems that impact the wider community due to tenant's mental health issues, experience of family violence, drug or alcohol related misuse or other inability to function peacefully. These are much wider social issues and evicting so called anti social people will simply exacerbate these problems for the individuals and families impacted and the wider community. We need to look for long term solutions by providing the support that these people need and by discouraging these problems in the first instance. Educating children and adults, supporting children and adults in need.
- The government proposes new nationwide Ombudsman and landlord portal this will clash with local elective licensing As a landlord I don't object to local council licensing but I will object if this clashes with government new ombudsman
- Individual assessment on properties if not meeting the threshold of good conditions issue this scheme with the owners and increase fee for those not complying and or gave closure notice - property not fit for rental - make these rogue landlords have insurance cover re house tenants - good landlords like myself should not be penalised
- Should not property conditions and anti-social behaviour be tackled if the property is rented or not?
- The council could use their resources to have stronger control over HMOs rather than chasing small individual landlords who do not cause any negative impact. A place for fly tipping/ depositing bulky waste can be designated to reduce bits of rubbish in random places causing the entire street to suffer. More youth programs / sports courts etc should

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

be set up to encourage young people to use their time and energy more productively to prevent anti social behaviours.

- Yes, the appointment of a local mediator.
- if you HMOs you should leave the ones alone, and find the other ones or abolish the whole thing
- Council uses it to make money
- Effective use of existing powers.
- fund tenants organisations to advocate for their rights, support setting up cooperative housing, support developments through planning that are not build to let, but are social housing - a real alternative to PRS, build alternative financial architecture so more people can have a stake in their own homes.
- I think private renting does not need licensing, but inspections should be made on an adhoc basis so that standards are being met.
- It's an unnecessary cost for most private rented property. Maybe needed for HMOs.
- i still dont see how having a licence makes you any better or worse as a landlord
- Licence should not be required if landlord opts for voluntary accreditation. The long-term aim should be get landlords to embrace higher standards, not simply rely on regulation which rogue landlords won't comply with and is costly to police
- I think this is a money making scheme for the council, a lot of the older landlord are coming out of the rental market, there should be something in place but not this
- It is not the Landlord that contribute to ASB, it is the odd tenant. Landlords have great difficulty in addressing this with any perpetrator. What can the Landlords do other than give them warning and attempt eviction, which is increasingly becoming more and more difficult. This is really a matter for the Police. Perhaps there should be register of persistent ASB offenders, which publically Black Lists the perpetrators and acts as a deterrent to others of similar behaviour.
- Make effective use of council staff to manage and react to the problems, rather than imposing the regulations on the landlord
- The costs don't make sense at all. What am I paying nearly £900 for exactly? If it was a more tenable cost I'm sure people wouldn't object.
- Question not clear
- Act on complaints.
- The current scheme is designed to raise money to finance supervision of unlicensed properties and rogue landlords.
- An online portal where residents can report issues with their rented property or report anti-social behaviour. Employ a team to deal with this issues.
- Social housing
- There will soon be a national registration scheme. This will be sufficient and expensive enough!
- More policing throughout. The way I see it you're asking landlords to pay for a service that is the responsibility of the Council. What's the % of anti-social behaviour of tenants as well as properties let by / through the council & strictly private landlords. The landlord should not bear any costs in your desire for additional funding. It is outrageous. The fees you're looking to charge are exorbitant.
- Managing agents should be licenced and required to meet standards rather than individuals
- I believe good landlords are penalised by the scheme, paying very large sums for a license. More should be done by the council to identify bad landlords and penalise those to discourage this behaviour.
- I don't think this system works in its current form.
- Licencing cost is borne by landlord, yet they dont benefit from it, and increase rent to cover it. New legislation is needed that helps tenants leave bad tenancies or report them and for landlords help to remove antisocial tenants.

Q12 Do you think the Council should consider alternatives to a selective licensing scheme to regulate private rented property conditions and management effectively and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed selective licensing scheme or a specific part of it:

- No one can possibly know the answers to your questions regarding anti social behaviour and littering etc but these are social issues and not relevant to licensing. The licensing scheme and other anti private landlord legislation is driving landlords out of the market (we are also selling our properties) which in turn is reducing supply and driving up rents to record levels. Well done!
- If landlords breach standards they should be subject to stringent licensing
- A service for TENANTS to REPORT issues if their Landlord is not responding or not resolving an issue quickly enough. The service should be there to provide legal advice to tenants. Good landlords have no problem getting a licence as they are already complying with regulations, but it is the ROGUE landlords who are simply not applying for a licence. Collecting £895 from good landlords is simply a money making scheme for the council and, in a way, pointless. The council does not have the resources to track down the landlords who have not applied for a licence and THOSE landlords are the problem and, therefore, making the scheme a mockery.
- Questionnaire without payment or license
- Anti social behaviour should be regulated by not only the council but also by police enforcement.
- Managing agent should be able complete condition reports and keep records of non HMO let's, to ease financial burden from landlords renting out to single family
- That is for you to research in the UK and abroad. There must be a better system than this.
- The council should deal with anti-social behaviour when it happens. Take action against the people who cause the problem! The truth is this is 95% revenue raising scheme.
- Targeted rather than blunt e.g. tribunals

Q14 Do you think the proposal to implement additional licensing for HMOs across the whole of Waltham Forest is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in an Additional Licensing scheme

- Again, money making exercise to charge landlords. In the year and half having a license I'm not sure what it's actually achieved from a landlord point of view or from a tenants point of view.
- Welcome Forest council, just making big money from the landlords.
- There is high rent and on top residents can not afford there is shortage of additional HMO so young people and working singles. It is hard to find sharing accommodation in the borough
- This additional licensing has merely increased the cost to landlords and resulted in increased rent for tenants because most tenants could only afford as sharers. Like two couples for example. To call this an HMO defies common sense
- The current Wards only and no more Wards should be included. In my opinion this is only another tax for the council and should be abolished as the cost of living is already high and you don't need to make it worse.
- it will drive the Rental cost up.
- Walthamforest has a stupid system in place where an additional license is in place for 3 sharers or plus. The HMO license should be required for 5 sharers or plus only. The policy is confused, restrictive and results in less availability of rental units in the Borough.
- The information, regulations stipulated in the additional licensing scheme is nonsense. The landlord is always at fault, even when their properties are fully managed by an estate agent and when tenants damage their properties. Also, for a consultation to be properly conducted, it is important for full transparency, so that people have a full understanding of what it is that they are actually agreeing to. How could anyone possibly know the conditions of rental properties across the borough? This survey is clearly a facade, so that when the borough decides to add further costs to landlords (your cash cows), it can say 'but we consulted residents'. It's complete and utter nonsense and why the UK continues to go down the shit. Keep rewarding and making excuses for the lazy, the drunks, the criminals, the kids who couldn't be bothered in school, the financially irresponsible. Keep also punishing decent tenants. You're doing amazingly at it!
- HMO licensing requirements are overly restrictive and burdensome. Selective licensing criteria is sufficient for all types of rental property, including HMOs
- HMO's should have been the first properties to have been licensed as many of these are the reason for anti-social behaviour.
- No a letting agent should be employed
- How does this scheme help to tackle ASB? Majority of landlords live away from the area or abroad....
- HMO licensing is required, but most HMO are used by single professionals, students etc who can't afford to rent even small flats in the capital, so bearing this in mind more properties are needed to do this so licensing just makes sure there is no overcrowding etc
- Your making enough money off people without inventing problems were there are none. We are able to do things ourselves the only problem you got is your benefits tenants not behaving but if you cut their benefits or actually made them do some volunteer work to help the community like pick up rubbish and dog mess we would all be better off as they not hanging around the market looking to rob people. We all getting our cars broken into or stolen. Or mugged. That's the real problem not if a house has a license.
- It is inhibiting decent rental. As it is impossible tk rent a property to a group of tenants who are not related. This inabiility to share a rental property young professional renters. And students.
- Existing legislation covers properties unfit for habitation - there is no need for more, and certainly not with such an astronomical bill. The licence scheme is a stealth tax to pay for that enforcement. It punitively punishes good landlords and does nothing to address the rogue ones who rarely get caught and don't bother getting their licences.
- Licensing will reduce number of HMO properties
- None should be included

Q14 Do you think the proposal to implement additional licensing for HMOs across the whole of Waltham Forest is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in an Additional Licensing scheme

- The only info I have about HMO regulation and ASB incidence is the data supplied in landlords' forums. I can't fairly assess this as I have no day to day immersion in the issues and no sense of comparativity across the wider sector. I'm happy to trust that you know what you're doing but find it hard to respond to questions in a relative vacuum
- All wards should not have a additional licensing for HMO licence, Cost of the licence can go towards maintaining the property instead.
- Need to incentivies all landlords to maintain and improve properties rather than penalise those who comply to enforce regulations on those who fail to maintain properties.
- It's another way to getting money from landlords who are already stretched by high interest leaving properties income into losses , I feel this is unnecessary
- Unscrupulous landlords won't bother applying so this then becomes a tax on reputable landlords. I also don't understand why it is so expensive given that it is just a desk exercise to issue the permit.
- Please see my previous comments. A more targeted approach to real problem areas may assist tenants more. The LBWF should assist landlords more with issues relating to problematic tenants. Too much emphasis is put on bad landlords. Quite often bad housing conditions is created by bad tenants. Disrespect for accommodation, ie litter, rubbish, damage ASB. Breach of tenancies, sub letting, overcrowding, drink and drug issues. Save for ending a tenancy a landlord has few options and avenues to take.
- Waste of money as landlords increase rents because of council beurocracy
- The wards that have the most anti social behaviour reports.
- It is not helpful, I was trying to help a few young nurse from NHS for low rate rental, but because it will become HMO and cause all other requirement and planning application. I have to turn down the offer for the NHS nurses. This is not helpful at all for the NHS and community. We need to support NHS but yet the system is not helping.
- Making houses with less than five occupants part of the additional/selective licensing system is discriminatory to individuals who are not in couples or families, who cannot afford to live in a house with one other person or less. Young professionals, who house share, have every right to live in the borough. Pulling Two storey houses with four sharers or less into additional HMO licensing is creating a shortage of housing for young professionals and ramping up rents for them. The privileging of those who have sex with each other, are married, or those with children is not fit for the modern age and does not reflect how an increasingly number of people live.
- No more licensing
- If you are to have a licensing scheme then it should be free and funded by the money received from heavy penalties applied to landlords that are not compliant.
- Tenants are struggling to pay rent this licencing will only increase their rent indirectly and make tenants more miserable and can lead to mental wellbeing issues which can lead to anti social behaviour
- Hawker place
- Additional means another licence on top of the first. Again, this is unnecessary. The cost will be passed to the tenant. Unless this is just a fund raising exercise.
- All of Waltham forest
- hmos are notoriously problematic, they are the only ones who should need a licence
- The council claims that the reason for the licencing is to help and protect tenants. I don't see why two couples sharing cost and living in a flat should be subject to additional licence. There are way to many hurdles for a landlord to acquire such licence hence there are no such properties available to rent. That hits hard young couples and ones with low income , makes it impossible for them to find affordable home. That contradicts the whole objective of looking after those on low income. If two young couples ,friends decide to share a flat they will not cause ASB, nor would be more careless in a kitchen to require very strict rules. What should happen if a couple and friend share a flat and the friend decides to bring his girlfriend/boyfriend in, do they have to vacate the property or the landlord will be in breach of the licencing condition?

Q14 Do you think the proposal to implement additional licensing for HMOs across the whole of Waltham Forest is appropriate? If you have answered 'No', please indicate what wards you think should or should not be included in an Additional Licensing scheme

- Same argument
- We comply with all licensing requirements and statutory compliance which is very expensive and there are no longer any benefits to being a private landlord providing properties for the private rented sector. The scheme is fundamentally flawed.
- Licencing increases the costs for landlords and in turn renter
- HMO should be subject to Licensing in the borough not the single family rented properties as this takes away a lot of supply and leaves vulnerable families without a home. Let responsible landlords manage the properties with least costs so they can keep families in their homes for long term

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

- Happy for licensing scheme but £700 for 5 years was steep enough. What does the extra charge actually achieve on a practical day to day basis?
- As before, you are likely to have law abiding landlords signing up but you should be targeting those who evade you.
- It is appropriate to consider all possibilities for managing these issues.
- Same reason as before. The landlords need to be held responsible for anti-social tenants, otherwise the problem never ends. Even in one case we had bad tenants move out and then the next lot were even worse! The landlord needs to be incentivised to vet tenants and resolve issues
- set up mediations services to find out what the issues are as all ASB are not the same and provide support whenever possible
- a new separate arrangement should be included for single tenancy properties where friends and people who want to rent together should be allowed. At the moment the scheme grossly discriminates against these types of tenants
- As per earlier comments pass the responsibility to agents who will ensure standards improve as landlords would not be able to let without complying
- More in person visits
- Free of charge registration and allow up to 5 people in single household
- additional and more controls and responsibilities to be passed on to landlords are unnecessary, confusing and unhelpful.
- licencing seems to penalise good landlords and push additional costs and administrative burden whereas bad landlords just ignore licencing requirements. More should be done to specifically target bad landlords.
- One should always consider alternatives.
- as stated above laws that existed before Housing Act 2004 were sufficient if used wisely
- The pricing
- charge the tenants for any scheme
- Registration of tenants and landlords who can get in touch with the council should there be any issues
- Use the laws you have. Stop adding costs and increase the rents for local tenants
- Surely the problem is the tenants and the concentration of tenants in close proximity. These people have to live somewhere and are likely to exhibit ASB wherever they live. ASB has many causes and I do not think that housing is a main cause although substandard housing may be a contributory factor.
- The council can reduce the anti social behaviour by simply introducing more social workers and mental health professionals who can help young people to get off the streets and start doing something better with their life. Also improve the current social clubs and health clubs for young people to start a sport or an activity away from drugs and other bad behaviour.
- I do not believe that the Council achieves anything but raising the rent by raising the costs. If somebody breaks the law then there exists a legal process. Having to buy a license to solve your housing problem is ridiculous.
- As mentioned before
- I do not feel a flat with 2 bedrooms rented to two households with no locks on doors by agreement of the tenants should be classed as a hmo.
- Anti social behaviour is not in HMO, the council should manage it equally in all housing sectors.
- Please see previous answer re staffing I would like to check up that licenses are being adhered to. I have never had a check on my property in 8 years. How do you know whether I am fulfilling the requirements of my license.
- Enforce existing powers available for anti social behaviour
- find a solution that will keep the cost down.
- Respond more effectively and promptly to actual complaints, not adding unnecessary costs to good landlords

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

- A similar scheme but with reasonable fees
- Registration per landlord not per property, as mentioned before
- Schemes that are fair to both landlords and tenants not only sided towards tenants
- Police the properties you don't do what you say your going to do as it is
- There should be a good tenants list, this will ensure that those that are know for causing ASB are not permitting to continue to do so in the Borough - implementation should be Borough wide
- Why is there A correlation between the two. If the issue is behaviour what are the causes?
- Explain first your suggestions of what your miraculous scheme will do! There is anti-social behaviour because tenants have been allowed to get away with it for so long and have been protected by councils, because there is not enough social housing...due to the nonsense, exploited system.
- Apply selective licensing requirements
- Again get landlord to do gas safety and electric safety test and email them to the council.
- approach hoses with gardens full of rubbish as was considered unacceptable with the Olympics
- The additional licensing scheme takes the approach that all homes with 3 or more unrelated persons are treated in a similar way of a mandatory HMO. wHere there is a joint and several tenancy between sharers who know each other and wish to live together this should be treated in the same manner as 3 or more separate tenancies in a house. Current day and ages couples will live together with other friend as housing is too expensive. Implementing requirments whereby joint and several tenants are treated as indivudals households creates barriers for friends wishing to live together and imposes requirements which do not assist them. Infact such costs incurred by landloards are simply added to rental prices. There has to be a clear distinction between an additional HMO wghere there is a joint and several tenancy between friends living together and separate tenancies for persons renting out a room with a shared communal bathrooms, kitchen etc. This policy only prohibits well meaning professionals living together in the borough. This is both a loss in capital expenditure in the borough but also a loss of prosperity in the borough.
- Make better use of existing powers
- I'm not clear how the proposed measures, although reasonable would necessarily address anti-social behaviour? For that I think the Council needs more resources to visit problematic or potentially problematic premises routinely and take appropriate action.
- see my previous answer. You have 2 to 3 families in 2 bedroom flats. The landlord doesnt even know this is going on -as he isnt in the city or even the country- and he doesnt care as long as the rent is paid. Those who care, like me, will only let a 2 bed flat to 2 people and are very strict about who rents the property. By the way I am speaking for experience.
- The other option is to only let them be handled by Letting Agents
- liasing with landlords more
- I technically live in a HMO. We where 3 friends renting a well maintained home. Your policies have destroyed the feeling of it being a home we cared about into a feeling more like rented accommodation we share. It was a beautiful and well maintained home. We now suffer with cold and damp because of direct impacts of the licensing requests, suffer with fire doors that bang shut and this replaced decorative doors that helped the place feel like a home rather than a hmo. The scheme is removing the ability of organised groups of non related friends to build a life in Walthamstow. Forcing the landlord to make changes they wouldn't have to do if they rented the house to a family. The scheme needs a rethink.
- Stronger powers and the ability to take away management from agents who fail to comply with regulations.
- All properties to be managed by a letting agent and no properties should be privately managed
- Not so much property standards which is vital - but review the ASB management aspect?

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

- Get on the street and stop the real crime. All these people with no jobs looking to make money by taking it off other people. You should license the tenant not the landlord.
- One that worked. And was not so prohibitive. Currently It is a blanket a scheme with no nuance. LBWF treats all landlords as rogue and puts of scenes landlords who want to provide housing to renters.
- There is a serious problem with the current additional licensing scheme. Young professionals often rent a house with two or sometimes three other friends when they first start work. In my experience such groups typically share cooking and other activities in the same way as families and jointly sign a single rental contract, yet are treated differently under HMO rules. The HMO rules are appropriate for accommodation where strangers rent separate rooms but share some facilities, but are unduly onerous for accommodation shared by small groups of friends. As a consequence such groups will find it increasingly difficult to find suitable accommodation, whereas I believe they are a demographic that the Council should be encouraging. I know of at least one such group which had to split up because it could not find suitable rented accommodation in Waltham Forest. I believe accommodation for such small groups of friends should be subject to the selective licensing rules rather than additional licensing for HMOs. I am sure a legally robust definition of such groups could be drafted. This alternative should apply to the entire area covered by the proposed additional licensing scheme.
- Landlords need to be held accountable for anti social behaviour in their properties, otherwise they won't vet potential occupants
- Enforce the existing legislation that already covers ASB / property conditions. Why should good landlords be punished with exorbitant fees that bear no relation to the cost of any sort of register or home checks. I first got my licence when the scheme started (2018? 2019?) and my property was never checked or visited - even if it had been, £750 for these checks is utter nonsense. The scheme adds unnecessary paperwork - just enforce the existing legislation, which is more than sufficient. Do not plug gaps in council finances with unnecessary licence fees.
- Tougher/more frequent inspections. Following up/responding to reports of anti-social behaviour. Discourage houses of multiple occupancy. Clamp down on multiple vehicle registrations in one property, should be maximum of 2 per house.
- notice to landlord with set time then proceed with civil procedure.
- A quirk of the proposals would create an HMO whereby an unmarried couple enter into a tenancy with a friend. With the rents as high as they are this scenario is all too common.
- Social housing.
- Inspections of these properties should be carried out regularly to ensure the landlords maintain the property.
- More police presents in the streets
- The current scheme should be scaled down to reduce cost. Making landlords pay for enforcement that may not be required feels like a form of pilfering and should not be allowed to expand even further. It is turning out to be another money generating scheme which is making live even more difficult for residents who are renting. I have only recently moved out of rental property in Chingford.
- No rentals
- Deal with rogue landlords and bad tenants
- A report helpline followed by property inspection.
- HMOs are different in nature and possibly do need more oversight
- Council should be doing regular checks and instead of charging the small landlords with less than 5 properties should be using the selective licensing on landlords who own more than 5 properties to tackle the bad name given to landlords.
- Set minimum standards in consultation with Landlords and tenants. Stop making this a money making scheme for the Council
- Dedicated contact numbers to complain

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

- ASB should be dealt with as a crime by the SNT and police.
- Clubs to get the children off the streets
- I feel that the council should tackle the asb in HMO properties directly with the tenants involved rather than the landlord. The landlord should only be responsible for the conditions of the property.
- All wards should not have rental licence, Cost of the licence can go towards maintaining the property instead.
- Make those who fail pay for the policing of the system
- The most robust and proactive alternative would likely involve a combination of strategies tailored to the specific needs of the community. This might include: 1. Enhanced enforcement of existing regulations: Strengthening enforcement efforts to ensure that landlords comply with current housing standards and regulations can help improve property conditions and address anti-social behavior more effectively. 2. Community engagement initiatives: Engaging with residents, landlords, and local organizations to foster a sense of community ownership and responsibility can empower stakeholders to collaborate in maintaining safe and vibrant neighborhoods. 3. Targeted support for landlords: Providing resources, training, and incentives for landlords to maintain their properties to a high standard and address tenant behavior issues can help prevent problems before they escalate. 4. Data-driven decision-making: Utilizing data and analytics to identify areas with the highest incidence of anti-social behavior and property management issues can enable the council to allocate resources more efficiently and target interventions where they are most needed.
- Voluntary certification.
- As previously stated a property ombudsman would cover licensing
- Have a dedicated team to deal with any issues, without the need for licences. If a landlord is an issue it will get flagged up
- Managed by Anti social behaviour teams and other teams.
- I don't know of any tenant who has been asked about their landlord Who is regulating this scheme
- Only basic health and safety of someone renting more than 3 properties should be considered. Renting spare rooms or rent one extra house to as sole earning leads to additional overheads to already financially suffering residents .
- The cost implication for a landlord for the license have to be taken into consideration as this will add to the costs for Landlord, which means the rent will need to be increased
- deal with tenants and specific issues on an individual basis not target everyone - landlords do NOT want to operate in an area where there is extra red tape for no reason - and there is a housing shortage as is.
- Same answer as that for Selective Licensing. I simply do not believe this should be necessary for requirements to be enforced.
- Something through tenancy regulation and through agents rather than burden on landlord and it shouldn't cost money but not to abide by should incur fine
- Renters Reform
- A tribunal process similar to the small claims court where both tenants and landlords/agents can apply for rulings and tenancy terminations
- Anti social behaviour is caused by an individual, not by where they live.
- Indemnity by Tenant to landlord and visversa
- Data analytics to identify houses with multiple occupants. An amnesty for tenants and a guarantee that they will be rehoused if they report rogue landlords.
- See above
- Implement more control, rather than a license that all it does is enforce an additional tax for no real benefit
- At present Waltham Forest does not carry out any investigation and pass all the responsibility back to the landlord. Under the present system there is an assumption that

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

the tenant is anti social and that the home owner next door is the victim. This is discrimination, by going immediately to the landlord the tenant feels their tenancy is put in jeopardy.

- STOP RIPPING OFF LANDLORDS THAT WORK DAMN HARD TO HOUSE PEOPLE LIVING IN THE BOROUGH
- There are many factors that causes anti social behaviour and charging higher fees is not a solution but rather adding to the reasons. Factors like health, low finances, life style choices, social backgrounds, employment status contribute to antisocial behaviour.
- Property inspections
- This seems to currently adversely effect private landlords letting property to long term tenants
- Have a team to monitor compliance
- Yes, to consider something that works altogether and remove the additional licensing and HMO in the council
- Making houses with less than five occupants part of the additional/selective licensing system is discriminatory to individuals who are not in couples or families, who cannot afford to live in a house with one other person or less. Young professionals, who house share, have every right to live in the borough. Pulling Two storey houses with four sharers or less into additional HMO licensing is creating a shortage of housing for young professionals and ramping up rents for them. The privileging of those who have sex with each other, are married, or those with children is not fit for the modern age and does not reflect how an increasingly number of people live.
- If the tenant report something than the tenant should report it to responsible local/central housing office
- If you feel that you need some scheme in place to manage this for you then simply fund it solely from revenue raised from penalties of rouge landlords. Not punishing good landlords.
- Again current legal remedies
- As mentioned, Licensing is not necessarily an issue but the costs being requested by councils are significantly high which like any business is passed to the tenants which is not fair for both Landlord or tenants.
- See Q26
- additional fines
- People in HMOS tend to be some of the most vulnerable in our society and my previous comments apply here.
- Assessment of properties and if not meeting threshold of good conditions then those landlords need to be instantly made to join this scheme and if no improvements to their pro then fees issue warning of license bring withdrawn and they then can't use their properties for letting - you need to be very tough eight rogue landlords and not issues penalty to the decent landlords (who are giving up and selling up)
- The restrictions imposed by HMO landlords might deter some anti social behaviour, but ultimately young people need support. youth targeted programs and outdoor sports courts could divert their energy to more positive outcome.
- Local mediation
- i think it's problematic to say that more than two people from different "households" is the appropriate standard for defining a HMO. i think that should be changed to better accomodate households of adults sharing. Its social engineering by the backdoor.
- It's better to licence only HMOs and leave non-HMOs out. They are often better managed that council or housing association properties.
- Same answer as above for Selective Licencing
- If you are doing it it should be the whole of Waltham Forest, but there needs to be something different instead of the license
- Publish a register of repeat ASB offenders to deter other from such behaviour

Q15 Do you think the Council should consider alternatives to an additional licensing scheme to regulate property conditions and management effectively in HMOs and help tackle anti-social behaviour? If 'Yes', please specify the alternatives and indicate whether they would be relevant to the entire area covered by the proposed additional licensing scheme or a specific part of it:

- Make effective use of council staff to manage and react to the problems, rather than imposing the regulations on the landlord
- The council has enough powers to tackle ASB but tries to shift the responsibilities to the landlords. As you know very well, the landlord has absolutely no powers to deal with tenants ASB. The only option is to try to evict the tenants(good luck with that). Which the elections coming S21 will most probably be abolished. In my experience and with number of other landlords, attempt to evict tenants for ASB leads to non payment of rent and with the state of the court system that leads to serious financial losses for the landlord. On the other hand the council has the powers to issue fines for ASB, engage the police , but i gess it is easier just to shift the responsibilities to the landlord regardless of the fact that his hands are tied with red tape.
- A cheaper system. The costs don't make any sense.
- anti social behaviour is nothing to do with the landlord, if an individual is being antisocial, it is other services that need improving, attendance in schools, 'mental health care, enough to entertain through sport or other engaging solutions, work that stimulates and affords them a life.
- If conditions are so bad can rely on neighbours to make council aware and then can target these properties. Not all properties need to be targeted with licensing
- An online portal where residents can report issues with their rented property or report anti-social behaviour. Employ a team to deal with this issues.
- Tackling anti social behaviour isn't a landlords responsibility.
- Unnecessary additional costs
- Use Managing Agents to regulate HMO properties
- I think licensing is much more appropriate for HMOs than single family households. But I still don't think it has tackled the problem of badly run HMOs.
- I have no opinion at all.
- Same
- We are selling our properties so don't care.
- Setup a helpline for tenants and allow them to report poor landlords and inspect those properties. This will reduce council and landlord costs, leading to lower rents for all tenants.
- Have s team to investigate complaints and sanction the landlord if they are not compliant. Why should the good landlords (in the NRLA) have to suffer for the minority. Discounts for landlords in the NRLA
- Provide channels of complaint and settlement.

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- Charities in my street let properties to their own employees.
- Landlords leech enough money off people who actually work for a living and contribute to society already without the council handing them more discounts
- Fees should not be applied by discriminating private landlords who offer a public service against so called charities which are often a front for private landlords saving on taxes and other costs.
- The energy rating of property is very often nothing to do with the landlord and there is nothing he or she can do to improve the energy rating - this is another way to penalise landlords with a new set of rules that they cannot do anything about.
- I don't see why a landlord who owns a property which is an asset which is likely worth hundreds of thousands of pounds, which they make a profit off of, should get a discount for owning multiple flats in the same block. If they own multiple flats in a block, they're probably a large commercial business and I don't think the council needs to be lenient on them. For charities, I can see this becoming some sort of loophole which large corporate landlords (who can probably afford the fees) exploit in order to pay less money.
- Landlords occupying multiple units within one building reduce competitiveness and increase power, and should not have a discount/preferential treatment on top of that. Incentives to improve energy efficiency make sense financially and environmentally
- The borough is made up of Edwardian housing stock that is extremely difficult and cost prohibitive to get to EPC B, this discount is unfair.
- If they are renting multiple properties they can more likely afford it
- Council shouldn't charge for statutory service. It's money making and doesn't offer protection to landlords
- Shouldn't be encouraging ownership by one landlord
- Good EPC ratings indicate a commitment to property and tenants and should be encouraged
- In Waltham Forest the housing stock is generally older properties and it is very difficult if not impossible to obtain an energy rating of Band B. I feel the rating should be set at Band C which is more achievable.
- I am not convinced these proposals are equitable. I believe responsible landlords are being made to pay for the problems created by irresponsible landlords.
- We should not incentivise hoarding property as an investment
- The housing stock in the area is old property that may not have good energy rating money should be granted / made available to upgrade energy schemes
- Landlords should not be incentivised to hoard housing
- Would hopefully encourage them to at least look at insulation/double glazing etc
- most properties in london CAN NOT achieved B or above no matter how much money is spent on the properties - short of rebuilding them. Confirmed by the EPC expert who carried out my reports. C is the highest they can achieve which my properties are!
- Energy rating should have no influence and no receive a discount, energy rating is set by the Government the landlord will charge the same rent regardless? Non profit charities should receive a discount assuming they are supporting the community
- EPC C should be given discount, not B
- i do not believe licenses are necessary and hence providing discounts should not be seen as great benefit to try and push them through.
- Council is profiteering on the back of the tenants. They are the ones paying for the licence. Licensing should be scraped
- A minimum B EPC rating is highly unlikely to be achieved with most London housing stock. This only creates incentives for fraudulent energy assessors to take back handlers for inaccurate ratings.
- B rating is very high for old properties.
- B????? On Victorian housing stock????? Effectively what you are saying is only the new builds can qualify, which skews the entitlement against private landlords and towards corporate.
- to minimize the costs that eats into profit unnecessarily

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- B rating on an older property would be impossible
- Every property requires inspection so discounts should not be applicable.
- Over-regulation by the council is costly both to landlords and thus passed on to tenants and reaps nil benefit in the borough
- Landlords who have multiple flats, houses that is their business. Where people have one property they are holding on to give to their children etc, they should be entitled to a discount. Those landlords under guise of charity they are again doing it as a business and getting plenty of benefits in the process.
- tenants should be charged
- I don't think there should be any licence fees, because we as tenants pay it in the increased rent.
- I do not think that some landlords should be cross-subsidised. Incentives for energy efficiency should be sufficient without further discount. If discount is to be offered then EPC C would be more appropriate.
- There should not be a chargeable scheme
- EPC rating B is unrealistic for a lot of properties unless at considerable (and not economically viable) expense. This discount unfairly benefits landlords of new properties.
- I think it is completely unfair to charge landlords a fee to rent their owned properties. This is simply another tax!
- Many properties in Waltham Forest are old Victorian properties. My own are single brick, as are many terrace houses, so impossible to insulate. Penalised again for something that is pretty much beyond my control.
- they have obligations to each flat
- Multiple properties discount. Good landlords discount.
- All landlords should be treated the same
- It should apply to everyone, and no discounts. Or the big build to rent blocks will not have to apply
- If landlords have done what they can to make sure their property is well insulated and efficient they should be allowed a discount. However a lot of WF has old Victorian property that cannot be easily made efficient and certainly not to B standard.
- The council knows that most properties in the borough cannot reasonably achieve a B rating due to the age of the properties.
- Getting a Victorian built Warner flat from a D to a C energy rating is cost prohibitive. Rewarding landlords of new builds only will just mean more landlords will sell up. Stock will be reduced and tenants will have to pay exorbitant rents. Landlords would be better off spending the money on efficiency rather than blanket licensing charges that have served zero purpose to me as a landlord for 10 years.
- Single property landlords effectively pay more
- energy rating should be C and not B for discount - the only properties that meet B or above are new build - very small % of housing
- The law states that EPC band C is sufficient.
- Because all of the above isn't fair otherwise
- The quantum of properties owned should not determine the discount earned but the quality of and the management of the properties should determine the discount. Sadly many charities are set-up that are not truly charities and so as the charity status can be abused I don't believe this is a sound parameter to determine awarding a discount.
- Being a charity (including religious organizations) is no guarantee that they will be better landlords, so they shouldn't get a discount. Cost should be per property not per landlord, otherwise you're favoring the large management companies who are often the worst landlords.
- It is virtually impossible to get a b rating - discounts should be for C and above EPC
- I pay a fee for a single property, and landlords should pay a fee per property. If they have multiple units In a block I would feel disadvantaged towards that.

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- Why are landlords paying anything???? Please explain this. And the stupid excuses of 'to reduce anti-social behaviour', 'to make properties safe' is a lie. Fix the social housing first, then come for us.
- Many old properties are not practically able to improve energy ratings. cavity wall insulation is not possible with no cavity for example
- What is the average energy rating for properties in the borough? Think this should be set at C and above with further incentive to achieve B or higher
- There should be no selective license so no discounts applicable
- The EPC rating of B is too high. THIS should be set a C. Many properties in LBWF are old Georgian homes and they are simply not capable of being brought up to a B. One factor to check that all landlords could assist with is ensuring appliances in the property are a B rating. But the general property should be a C rating - double glazing and loft insulation.
- Climate-related concerns should be addressed separately to the safety and security of let properties.
- Don't think having multiple flats should mean a discount as you are earning more !
- I believe that a discount for energy efficiency is a positive step however the proposed "B" rating for which it should apply is too high. As a former owner/occupier of my rental property, I spent considerable expense and time renovating and improving the energy efficiency of my property, shifting it from an initial E to its current C rating. The only way to reach a B rating would be to install solar. Such a modification would not be cost effective for such a small property. Why would multiple flats in one block trigger a discount? The need to comply with policy doesn't change whether the landlord has one property, multiple (same address) or multiple (different addresses).
- B rating is a high bar. A lower rating may encourage more to try & reach that rating.
- Not always possible to achieve energy rating of B especially in an old house
- I think that Landlords who have only 1 property should not have to pay the same fee as Landlords who have several as they obviously run it as a full time business.
- Because landlords who own and let multiple properties can afford to pay more
- The price will be passed on to the tenants. Grade the landlord not the quantity.
- Discount could be based on how well the landlord has managed property versus those who are not good and should be penalised
- There should be no discount too any landlord
- Given the high costs associated now with being a landlord leaving the profit margin lower than in previous years, as such having a huge impact on landlords selling their properties this in turn is having a further negative effect on the amount of rentals in London as a whole. Whilst ensuring rentals are monitored is a good idea, why are landlords having to pay for it. Additionally if a fee continues why choose the least applicable group to offer a discount. This is simply not fair or acceptable as the majority of landlords will not fall into this category.
- Charities also make the same rent so shouldn't get any discount
- It may not be possible for a Landlord to improve the energy rating of a property as it maybe in a block of flats. Such landlords would therefore be penalised in this situation resulting in less such properties being bought for rental and therefore reducing the number of rental properties available.
- The admin is less for LBWF so the landlord should get discounts. This is not supposed to be a revenue raising operation so that LBWF can make a profit.
- Landlords shouldn't be incentivised to own multiple properties by receiving a discount. Similarly, I think at face value, eligible charities receiving a discount sounds worthwhile, but realistically, landlords will just put houses they're letting under their own 'charities'. So I would strongly agree with charities unless there are very serious checks on the validity of the charity, but that will take significant officer time and cost the Council more money.
- Charitable providers, like Almshouses, do not currently have an exemption, but these properties are without exception well maintained, affordable and catering mostly for the elderly. They do not cause any of the problems SL aims to address.

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- They got more money than everyone else. You need to look at the tenant and license them not the landlord
- There should be no fees. The improvements works are incredibly costly as it is.
- I have my doubts as to what some of the 'eligible' charities might be.
- if they let multiple properties in the same block, then they are making a higher income, so should not receive a discount.
- Supports cost of living for more vulnerable residents
- Don't understand why landlords should be given a discount when making profit already.
- There is no discount for landlords who own individual properties but have a record of being good landlords, so I don't agree that these two categories should receive a discount.
- That is simply rewarding wealthy people for owning multiple flats. It should be a flat fee per unit.
- No reason to
- I can see there is some justification for a discount where there are multiple lets within the same building structure.
- Very few properties within the Borough will have an EPC rating of B or above and thus only a small number of landlords benefit.
- Discounts should only be given on merit and not just on rating of B or above. Generally a discount where there is clear evidence of works carried out for properties in becoming a B rated property should get a grant rather than discount.
- Totally ridiculous to use Band B - especially for flats where there is nothing landlords can do to improve the building itself, and many are not served with mains gas, which makes achieving above a C almost impossible. Also, the fees do not in any way relate to the cost of checking the property or landlord. If the ridiculous scheme continues, huge discounts should be given to those landlords who already have licences and can show good states of repair for their property. A renewal should be a matter of a small admin fee - not £750.
- Energy ratings have nothing to do with ASB, litter, dumping rubbish, unsafe properties etc.
- 'Charities' often seem to be dodgy money washing fronts.
- The costs which are intended to be covered are not affected by the energy rating of the property
- A landlord with multiple properties is earning multiple rents, I don't think they should receive a discount that would be financially beneficial from the Borough as presumably the Borough would be expected to inspect/enforce/assist in each dwelling as a separate case. Each flat is separate and should be treated as so.
- the costs of energy efficiency to B will be passed onto tenants via rent. This is not appropriate during a time of financial concern.
- Landlords will exploit this as a loophole.
- I fail to see why they should receive any discounts. They're a business and they certainly don't pass any discounts on to their tenants.
- Then people will soon be saying they are charities to get these discounts . Is there a way of checking they are genuine charities ?
- no fees at all , it makes rents go higher
- Because most charities only pay 1% of profits and most of the money goes to CEO's so why should we have to encourage vast profits when the small landlords can just about get by, that's if you have a good tenant that pays there rent!, I have started to sell my properties because no one looks after the they abuse them and donot pay there rent money,,
- Landlords are not allowed in control of energy ratings, for example, we cannot insulate a block of flats without majority leaseholder approvals.
- No rentals
- Property Licensing is just a money making exercise and does nothing to improve things for landlords or tenants.
- To encourage landlords to maintain decent standards
- My experience is that the neighbour who lets out lots of rooms is making a fortune

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- I do not agree that Landlords should get a discount for letting multiple flats in one block. There's a lot of fraudulent activity in the private sector and HMO Landlords are the worse offenders. And they will try anything they will to get a discount.
- I don't have enough knowledge of the charity sector to say whether this is fair. (Presumably they get tax reductions as well?). Energy ratings of B+ are pretty hard to achieve in the aged properties which constitutes much of WF. Discounts for multiple properties in the same block could include 'family' landlords? (eg two family members operating in the same block)
- I don't think that there should be a licencing scheme. > It is not operated in all boroughs and where it does not exist the housing conditions are no worse than in Walthamstow. Unfortunately it just creates another layer of bureaucracy and the money could be better invested by the landlord to improve the property or keep rents lower
- The quality and safety of PRS housing is very poor as WF documents relating to this consultation indicate. With the council lacking funding, it is clear that funds need to be generated to finance enforcement against landlords who provide unsafe housing. This should come from landlords. I can see no justification for discounts. If a landlord owns multiple properties, they are making more money and can contribute more. I do agree that properties need to be insulated and brought up to EPC band B, but I believe that landlords should be forced to improve properties through legislation, not incentivised with discounts.
- EPC rating of "B" is a ridiculously high standard that will exclude almost all period properties, leaving only some new builds able to achieve. EPC rating of "C" is fairer and more realistic. A "C" will also act as more of an incentive to upgrade, as a "B" is just not achievable in most cases, and totally unachievable in period properties.
- I don't agree with a licence at all.
- Encourage those who are complying
- There should be zero cost to let a property. The property market is rapidly running out of rental properties and this makes it worse, not better and there is no evidence this improves conditions. It reduces supply and increases rent.
- Landlords are making money from every property - they are not discounting the rent so why should they receive a discount for their licence? Charities are no different.
- The processing and enforcement costs are the same whether a charity or not.
- Make a flat fee for everyone but stop putting it up each year the licence doesn't do anything
- Problem landlords cause the issues, but 'good' landlords register and pay the fees, subsidising the cost of enforcing standards
- B is unattainable for many properties in the borough due to age. C or higher should be the discount bracket as even the government do not require properties to be at a B
- Licence fee is an unnecessary cost and tax being forced on landlords and tents paying for it in the long run.
- I do not believe that landlords should receive discounts for having multiple properties in the same block, because such landlords are clearly operating as a business and it is grossly immoral to give discounts to the more wealthy, compared to people like myself, with only one property. Large landlords costs are far less because they enjoy economies of scale by having their own teams of workers. As for the energy ratings; some older properties are virtually impossible to upgrade to that level.
- The choice to let multiple properties is entirely a financial measure
- This is just a tax grab which will not help anyone, This will only go in the pockets of corrupt leaders. Selective licensing should be abolished completely, it's not fit for purpose.
- They have spent extra money to maintain/improve the standard of their property so should be rewarded
- It is not possible for all flats to meet an energy rating of B ...perhaps this could just apply to houses
- If the intention of the scheme is to drive up standards then anyone who complies should pay the same or be entitled to a discount based on the property features not how many they own
- How many properties in Walthamstow B and above?

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- The fee is far too high for the service provided. This will encourage landlords to increase already high rents and pass the cost on to the tenants.
- Increasing interest rate has left the landlords with no extra income from their rented property. Most landlords are struggling.
- All cost are passed onto tenants. This system is probably unfair as the tenant with the poor EPC rating pays more to heat their home and since cost of licensing is passed onto tenant they are then punished again.
- Discount on energy rating C and above. Only a small admin fee of £100 to £150 to process the application. Not the silly money you currently charge. Landlords will pass all these extra fees down the line to tenants. Hence raised rents.
- Costs are going to be passed on to tenants with higher rents
- Only charities should get discount, if licences are introduced then it's only fair that they are paid for each property. Otherwise, it's unfair that landlords with only one property pay full licence
- All landlords face the same challenges. Discounts don't equate
- The current specifications for improving the EPC rating are unclear and penalise older properties. Until this is clarified it seems unfair to award a discount.
- does not consider the 'performance' of a landlord (how good / bad)
- Encouraging landlords to provide energy efficient homes should be a priority.
- Charity status already grants significant financial benefits to landlords
- The B rating is too high C would be more realistic, given the historical age of construction of the housing stock across the borough.
- charities are still landlords
- Unrealistic and unreasonable
- The charges for all selective licensed properties should be the same. The price for all additional should be the same. Overall the cost of licensing should be brought down and councils should work with landlords rather than unnecessary punitive high costs for licences. The PRS is part of the housing solution not the housing problem.
- 100 year old house to be energy efficient requires around 50 thousand pounds improvement, and to get B it is nearly impossible unless its new built, doesn't make any sense to give discount at all
- I am a leaseholder of a flat so I can't improve the energy rating in any meaningful way as it would require work on the fabric of the building. I have double glazed windows but that's about all that is possible.
- I have a flat with double glazing and the best/most efficient wall heaters that are possible. All the areas where I could improve the EPC rating are beyond my control - there is no gas to the property, there is nowhere a heat source pump can be installed and the freeholder won't consider cavity wall insulation. So through no fault of my own, I wouldn't get a discount and would pay more for my licence than other landlords who probably care less than I do about my tenants - the fact my tenants have been with me since August 2019 would suggest I'm doing something right. Also, if charities include housing associations, then they are the ones that, in my experience, flout the rules more than most private landlords. They are under-resourced to properly manage their properties and house large families who then have more people come to stay with them without approval of the housing association - this isn't speculation as it has happened in the block of flats where my flat is.
- Landlords should receive a discount where they let multiple properties anywhere in the borough. An energy rating of B or above is almost impossible to obtain, other than in new builds. The works necessary even to achieve a C rating are often not cost effective.
- Most private landlords have no control over the energy rating of their flats and should not be penalised for the manner in which old buildings have been constructed. If eligible charities are housing associations then they can afford the fees.
- Vast majority don't have properties that are old Victorian and will never achieve B rating. Only new build. So this is unfair
- Charity needs to have discounts
- charities is for hiding money

Q16 Do you agree or disagree with the following proposed discounts to licence fees? If you have answered 'Tend to disagree' or 'Strongly disagree' for any of the above questions, please explain your answers

- Green lobby is separate from quality housing. Too many agendas
- i see no logic for why landlords should receive a discount for multiple properties even if they are in the same block? i think it would be better to reduce the basic cost.
- These suggestions sound fair.
- Because it saves energy for the planet
- how does an energy rating make you a better landlord? its ridiculous
- Why penalise good Landlords
- If the YMCA properties in Spruce Hills Road E17 are an example of 'charity-owned' property, then they show just how ineffective the current scheme for that style of property is.
- Tenants are the one who are paying the fees at the end, the should be no cost for the scheme
- Each renter and each property should be looked at on an individual basis. There isn't a discount for renters when multiple flats are rented, why should there be for landlords. The more properties, the great the profit.
- Why B energy very hard to achieve ?.....
- Policing is for mutual benefit, not related to ownership.
- I do not think a licence scheme should be in operation. Other parts of the country do not need one. Why should our borrow be penalised. I am not running this as a business, i happen to be a landlord whilst im not living in my house in london and working away.
- All councils that are charging are the poor boroughs that's why reputable landlords take their businesses elsewhere
- I would worry a charity would be created on paper for this purpose
- Landlords shouldn't get discounts
- the rent charged is high , landlords need to have a duty of care to their tenants, there needs to be affordable rent , and suitable fit housing . they dont' need a discount and should not be rewarded for providing safe, energy efficient affordable and fit homes for people
- Financially rewarded for being ecological and charitable
- Just makes sense as it is less admin and monitoring for the Council..
- Why should the same block make a difference? Convenience of inspection? Those are done randomly anyway. Its not like someone owning an entire block is in more need of a discount. Little landlords who only manage 1-2 do. They create competition and lower prices.
- You should not be charging anything. You are driving good landlords out of the market.
- Landlords should be charing sufficient rent for each proerty they rent out that can afford the license. No discount necessary
- Charitable trusts often part of a commercial operation
- All properties should be treated the same regardless of how many landlords own in the same building etc.
- It will be open to abuse. Unscrupulous landlords will take advantage and buy more in one block and therefore that particular area could become rundown in a matter of months if they are substandard. Pricing should be the same for all.
- I'm against multiple occupancy and disagree that they benefit from anything!
- Why should landlords who own older propertys be penalised because of their energy ratings. I'm not charity this is my livelihood and I have to pay.
- Charities are not necessarily good landlords and should be subject to same conditions as all landlords.

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Don't know.
- The fees for licensing are too high and not proportionate it would be more beneficial for the tenants if landlords invested this money in upgrading the properties instead.
- Landlords who provide superior housing should be offered a reduced fee
- Bigger fines for breaching conditions
- Properties which meet legal housing standards should receive a large discount or have no fee. The cost of administering the service should be borne by tax payers money, not solely the landlords who provide a valuable service. An increased fee will only result in increased rents. The 'bad' landlords should bear the costs of the administration.
- They need to focus on the bad landlords and make them pay rather than the good landlords - that's where efforts should be focused.
- None
- I think you should make the fees higher to be honest since they last for 5 years. Hopefully this would help ease the burden on the council for maintaining the licencing programme.
- Why should landlords with compliant properties have to pay part b, which you say is covering the enforcement and therefore not required for their properties!
- Non fees
- None
- Discount for landlord with only one property.
- There should be additional incentives for good practice and stiffer penalties for landlords who consistently fail to meet standards
- The council should keep the fees low, otherwise the costs will pass to the tenants.
- Discounts should be given to landlords who have more than one rental property in the borough irrespective of if they are in the same block
- Early bird discount
- landlords who rent to students and key workers, single parents, elderly
- No fees scheme to rent out property
- some landlords are 'accidental' and havent set out to make a profit/run a business. fees should only come into effect if a landlord has more than 1 property.
- none
- The more a landlord complies the lower or NO fees applied! You are only currently getting hold of good landlords atm. As seen at the landlord forums ..
- No
- A fee free scheme would encourage more landlords to comply and reduce those relocating their portfolios to areas without licensing schemes.
- Those supporting people on benefits to find homes
- This is simply a tax on rentals. The costs are passed on to tenants. There is no justification for the fee
- No fee
- even if licences are implemented - the fee must be "0" or peppercorn to encourage compliance, not be seen as a cash cow.
- Discounts for those with only one property.
- Scrap the fees!!! Scrap the scheme!!!
- Payment over a longer period of time
- Cut the fees and stop using landlords as if they are cash machines provided for the council to extract as much money as they can. The costs have to be reflected in higher rents and so tenants end up worse off.
- Tenant satisfaction.
- n/a
- Good condition of property. Tenant satisfaction
- A discount for landlords with a good record as per Barking and Dagenham's policy.
- There should be a discount for single property landlords as they are not 'career landlords' and the license fee is dispropotionatly high to rent received
- Remove the licensing requirement.

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- This is a revenue generating scheme for the council. Nothink more, nothing less. The tenant has a contract with the landlord, not the council.
- Health and safety inspectors powers are sufficient to ensure property living standards.....licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- Good landlords are being penalised for the few bad ones. People who own multiple properties should have greater oversight as this is a business. People who have one property rental which is their pensions will generally look after it and the tenants. I've seen no positive outcome of the licensing apart from the fact that the council are just making more money for nothing
- I pay a managing agent to make sure the tenants are vetted and the property condition is inspected, which contributes to achieving your outcomes. If I can prove this I should receive a significant discount as I'm already helping.
- If the property has been rented for long time discount should apply
- Where the landlord is a leaseholder some share of the responsibility should be applied to the freeholder and/or managing agent.
- No licencing payment
- This should be one per landlord for every property. How does charging every landlord make a difference.
- None
- Early Bird
- The fee goes onto the tenants
- Abolish all fees as it's contributing towards rent increases
- You should abolish licensing fees. You have introduced to in poor borough where landlords are struggling . In affluent areas of London there is no license fees or areas out of london, why is that??
- There shouldn't be any fees. Council is already getting council tax and this is part of councils duty
- tenants should be charged
- Blatant tax grab. Taking this money will mean that properties are less well maintained. Typical of this council.
- There should be a reduction to all fees. In line with Haringey
- No fees at all
- Maybe
- anti social issues are within the tenants who live in the properties they should be charged a fee to rent properties out in the borough when they leave they can be given back there money if they fly tip or over crowd a property then that money should not be returned this will fix the issues as landlords do not live in properties they rent out it the tenants that create a community problem within the area as they live here
- I have yet to see financial accounts for selective licensing in Waltham Forest and proof that it is cost-neutral. Without this information I do not feel I can comment on discounts.
- Any chargeable scheme will impact the tenants as costs associated will be passed onto them
- Discount for multiple properties regardless of location.
- Increased fees where the council has had to investigate properties during the previous year
- Register with no fee for property meeting a good standard
- I think it is completely unfair to charge landlords a fee to rent their owned properties. This is simply another tax!
- I think there should be a discount for landlords who do not cause the borough any problems. We are probably the ones that are paying while the bad landlords dodge paying. I have always filled in my forms and paid on time and yet get no benefit for doing so whatsoever from yourselves.
- Landlords should be made to improve their properties if they are substandard. They should not be charged for a license by where no inspections take place before issuing the license. This is just yet another scheme where landlords are penalised unfairly.

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Drop the property licensing. The licensing means that the tenants have to pay the Council for the possibility to rent a property. Ridiculous.
- Landlords with one small property which is well kept and maintained should be eligible for a discount.
- Just reduce the fees for every one.
- No discounts
- Accessibility. If a landlord makes a flat available with easier living enhancements such as stair lifts, hoists, grab rails, perhaps this could receive a lesser fee so long as they let to a person who is physically disabled and meets certain criteria. This could fit in your approach to housing too as we have an ageing population.
- Good landlords should receive discount on a sliding scale to complete exemption including this would include the exempt wards being proposed
- A discount for paying within 6 months of the bill arriving or early payment.
- There should be a discount if you own a single property with increased fees for people who own multiple properties and therefore are likely to operate this as a business. Since we took on this property, the costs have increased significantly - there is no mortgage tax relief, mortgage rates have skyrocketed. There will always be people who need to rent and therefore demand for landlords, you should be supporting landlords as well as tenants.
- Lower the fees
- Improve the abilities of tenants to complain about problem properties and landlords and for the council to then take effective action on these small number of individuals rather than punishing the whole sector
- If it's really about safety and quality of accommodation then you wouldn't charge a fee
- Previous licence without breaches should get a discount. It's clearly cheaper for the council to check it follows the rules (as already did) and there is clearly less need for enforcement.
- This feels like yet another money making racket by the council. These measures push small private landlords out of the market and along with increased mortgages will reduce supply of rental accommodation in the Borough and heighten housing crisis.
- Free to register, penalties for rogue landlords
- Charge enforcement fees if there is a problem to address at the property, otherwise good landlords are just paying for the enforcement action against poor landlords,
- history of an area - good areas should not subsidise bad ones
- Reduction for early payment & previous compliance and payment.
- Discounts for good landlords the ones who do everything correctly
- Quality of the property and management, history and length of time a license has been granted to the landlord, many term and many terms of fully compliance should earn a discount to encourage greater adherence to conditions of license without issue. If rents are kept at or below market rent and rent's increased below RPI or not at all for long-term tenants
- 1 address = 1 license.
- The fees should be much lower.
- Do the right and moral thing and get rid of it. So many other countries put us to shame when you see how their systems reward those in society. There is no excuse for poverty in the UK, it has been created by this system and it is shameful.
- Single occupant properties
- Landlords who have had a licence for a set period of time with no issues
- Think that selective licensing landlords with more than one property should be able to achieve a discount on any licensing fee. Also that this be set at C as a starting point with further incentive on a sliding scale to achieve anything higher
- Any charities should be exempt. The property income is used to fund charitable aims. Most charities are non for profit. the licence fee is an additional burden to already high operational costs.
- Early bird application discount - 50% reduction for applications made within 3 months of the start date.
- Phased payment for landlords with financial difficulties
- Get the money from the council tax or government and not from good landlords

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- This seems high to me compared to other areas a flat fee of 450 seems about right for the selective license. Otherwise landlords will put rents up to cover it and renters are paying enough already
- Landlords who have held a licence without problems in the previous scheme(s) should be eligible for a discount. Landlords who have been problematic should pay more.
- Discounts should be offered to landlords who maintain their properties in suitable condition. As a landlord who takes seriously all reported maintenance and tries hard to avoid applying excessive rental increases to tenants, it is very hard to break even. An increase in the license fee is concerning, and discounts for landlord who meet their obligations following inspection should be considered.
- I think a much cheaper system needs to be devised. The last licence lasted for a maximum of 5 years and was £500. But since then taxes and mortgages have increased massively and I'm renting at a loss. I can't afford £895! Discounts should be offered to landlords based on their costs, the rent they are charging and the condition of their rental properties. Not all properties can realistically improve their EPC rating especially flats so discounts should be given to those who are no more than one rating below the best rating they can hope to achieve.
- Early bird. The new rate is greedy & doesn't reflect the cost of running the scheme. Another stealth tax that will be passed to tenants.
- Discounts to Landlords with only one property and especially HMOs should pay a higher fee as these are the problem areas.
- For the previous two schemes the council had offered an introductory discount, which I took advantage of. I would like to see this option.
- When the scheme was first introduced my rent went up accordingly. Rents in WF are unsustainable for residents (in January 2024 my rent increased by 13.4%) anything that has the potential to increase rents further should be avoided until the housing crisis is lesser
- Rent control: it has become almost impossible for tenants to afford to live here
- Higher discounts for small local charities eg those only owning/managing 20 properties.
- Landlords generally get bad publicity due to those who do not co-operate. Without private landlords the housing crisis would be worse. Good landlords should be made an example of and the incentives would mean more landlords would step up.
- The council should have a licence and housing association for all these properties so they are of a good standard as well
- Early bird fees
- I think most these licenses will be renewals so just a cheaper renewal fee would be better , also you expect landlords to fill out your long winded forms every renewal, just keep the information on file and ask only the questions that might have changed and loading of certificates. Plus why should you charging for ASB not every landlord has tenants like that
- Discounts for energy ratings C and above. much victorian housing stock simply cannot reach an energy rating of B.
- Charging license fees should be abolished as it tends to effect responsible landlords in the first instance who apply for the License. The more unscrupulous landlord will avoid the requirement anyway and in the process will provide poorer quality housing.
- Energy rating C and above should receive discount. Impossible for Warners flats to achieve A or B. Discount if no problems
- Use part of the fee for an inspection of every home (circa £250 should cover this) with a requirement for defects to be put right before the home is let, if severe, or within three months, if minor.
- Show what value to new landlord is elicited by the fee. There is little advice and expertise. The licensing scheme seems like a revenue generation exercise. With no added value.
- Early payment
- Take in consideration the purpose of the letting. If it is commercial or buisness then maybe the rates have to be differebmt form landlords that are letting to help repay their mortgage while they maybe working abroad. If the property is being managed by a reputable letting

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

agent that has been regulated by the authority then the cost of the licence should also be considered.

- Given the current cost of living and the need for tenants to find affordable housing, additional costs on landlords from the council in paying for landlord licences (which are ultimately passed onto tenants in increased rent) is counterproductive.
- Consider what is adequate for the council to enforce breaches.
- None
- Fees for additional waste services
- If the landlord pays the council tax for the rented out property a discount on the licence should be considered.
- Keep the same or reduce
- Discounts for accredited landlords should be offered
- Discount for maintaining the borough's properties in a good state of repair
- Not sure
- Landlords who have a record of being good landlords.
- I think you're penalizing working class people with this scheme, but renters and landlords. The additional fees will be passed along to renters who are already squeezed by the cost of living crisis. And anyone looking to convert a portion of dwelling to a flat is also penalized and maybe not allowed to do this. The cost of living crisis is hitting everyone.
- Increase fee for anti social behaviour
- No fee, this scheme improves nothing and just increases cost for renters and the fees will be passed on.
- None
- There must be an early bird discount. Landlords such as ourselves who apply and process quickly should have a benefit for doing so but by not offering this facility you are penalising us and all long term landlords for whom this is the third round of licensing. Many landlords may not have processed licence applications when due and thus the expiry dates will be later. No early bird discount = NOT FAIR!!
- Discounts on one property only, especially for properties looking to insulate (roof / double glazing etc...) the homes in reducing the property energy output.
- The fees are DISGUSTING. More than £13million has been raised by fees - and what has it been spent on? My flat has never been inspected, I have never been called or DBS type checks been done. What is the fee for? Even allowing for tricky traffic, an inspector could easily visit 4+ properties in a day. Are you paying them £3000 per day (4 x £750)? Then why are the fees so high? Rogue landlords are a scourge, but council coffers should not be bolstered from the pockets of good landlords.
- All this cost should come from all tax payers. Why am I paying council tax and this tax.what are any of these problems to do with me. .we do not have an extra licence for the police
- Have very low fees
- The license is extremely profitable to the borough, providing millions of pounds - an easy money grab. I feel the widening of the fee to EVERY landlord has been disproportionate and discouraging to landlords, who are essential in this housing crisis. Possibly if a landlord has provided good housing at the end of the 5 year period, with no reported problems then the fee should be refunded, minus an admin fee. It's very expensive maintaining good quality housing and good landlords should be rewarded not further punished.
- Part B (the enforcement fee) should be charged on a yearly basis so that someone who lets a property for only one year should only pay the cost of the application process (Part A) and one year of the enforcement costs (Part B).
- I would suggest that if a landlord is found in breach of the licence and doesn't remedy it within a fairly tight amount of time they should have to pay the same amount again or some kind of hefty penalty for each infringement. That could help with the rogue landlords, while also allowing decent landlords who occasionally make errors or miss something, a window of time to make it right without a penalty.
- Early payment discount.
- None - the council need not burden landlords (and ultimately tenants) with additional costs during a cost of living crisis.

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Too many rogue landlords in the area. Rules need to be stricter to ensure landlords are compliant.
- N/A
- None.
- no fees at all , it makes rents go higher
- Landlords that are shown to hold a good record with the Council should receive a discount.
- the council should inspect the properties before issuing a license. The council is then better placed to assess if the landlord is pro active in maintaining the property. Granting a license for having a goos character is not sufficient evidence that they are a good landlord.
- We shouldn't have to pay a fee we are getting tenants off of you waiting list!
- The discount needs to be higher and wider to include incentive for landlords who have not had any issues of complaint or enforcement against them when renewing their licences. There should be discount for private landlords renting just one property. It will encourage owners to bring more properties to the rental market and help reduce rental costs which are currently too high.
- There shouldn't be any fee.
- Council should give substantial discounts of 50%
- Accredited landlords discount; renewal discount.
- Single property owner discount. Landlords are far more squeezed than they've ever been, don't make it impossible for single property owners to become landlords.
- There should be one fee per landlord and not per property
- I don't really understand why the additional license is so expensive or why if you have a selective license you can't just apply for a variation when your tenants change for instance if a family move out of a three bedroom flat and three un-related friends want to move in. Surely having unrelated people living in a decent small property with communal areas (e.g. two couples, friends group of individuals) is to be encouraged as it is these kinds of people that cannot find affordable places to live in London. The scheme as it is limits the supply of decent places (that aren't bedsit type style) for unrelated people and means that young working people find it impossible to afford good standard accommodation in London or are forced into living in traditional HMOs. Given the housing crisis this just doesn't make sense to me. I believe the selective license and the additional license should be one and the same or easily varied.
- Removing licensing and associated fees altogether
- Historical background checks should be carried out on the Landlord and tenants before considering offering a discount.
- Reduced fee for older landlords who rely on rental income to survive
- Have no fees for tenants on housing benefit. The fees only increase the rent paid by the tax payer.
- Do think perhaps landlords should get a discount for improving energy ratings (e.g. D to C) or having a lower one - e.g. C. Might incentivize more to upgrade their properties to be more energy efficient even if the property is not highly energy efficient which might be because the nature of the property means a its too expensive to upgrade it to that extent.
- Early discount
- Early bird, 'rollovers' (renewal rather than brand new applications), transfer of licence when a property is sold to another landlord, rather than a brand new application.
- Opening more channels so that tenants can make complaints about poor housing conditions. At the moment the present licencing scheme penalises good landlords
- Don't know
- I feel that the part B of the fee is much too high. It seems like the council is penalising all landlords in order to investigate the few who provide sub standard properties. Those landlords who provide acceptable standard properties should not have to shoulder the burden for those who don't.
- How about not punishing with high licence fees the good and responsible landlords who go to great lengths to look after their tenants and properties to a high standard.
- If you must tax us, at least reward those that supply good quality housing with a discount
- Additional nee applications more expensive than renewals

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Landlords who provide quality housing and have a very good record of managing tenants including anti social behaviour.
- NONE! They should not exist.
- No discounts - full rate for every property.
- The tenant should have responsibility as well
- Stop looking for ways to take money of people trying to help others if there's a rogue landlord address them then if they try again to rent the property they should then be subject to a licence
- Parity and fairness across the board.
- Big discount (say 70%) for landlords who meet all the registration requirements without need for enforcement
- Multiple properties in the borough discounts
- NO FEES
- Why Epc rating of B ???, this is far fetched an expectation for many properties- in many cases impossible
- There should be no licence fee, its not needed.
- Increase fees where landlords have been the subject of complaints of anti-social behaviour.
- There should be no fees at all, it's extortionate, revert to the system before this was introduced
- Shouldn't be charging fees as this is an additional cost added to renters in the long run. This cost isn't absorbed by the landlord it's passed on to the renter in the forms of higher monthly rents which u have suffered as a result of the council taking money form landlords who inevitably pas it on
- It is unfair to charge good landlords more energy should be put into giving large fines to bad landlords
- selective licensing should not be in place at all.Abolish it now.It's a tax grab.Tenants will suffer and there will be much more homelessness which the government is not anything about it.Abolish selective licensing now.
- If a landlord has been approved for both the 2015 and 2020 licensing periods then a discount should be allowed on the first part, which is administrative, and should mean less work for administration.
- Consult with tenants, landlords and property agents to ascertain which properties are in poor condition. Don't have a blanket tax on all properties. Does the licence actually stop shitty landlords? Do you check??? I've never been checked so could have no windows or doors on my property and be housing 20 people in a one bedroom flat for all you know.
- Enforce through fines rather than upfront fee of £900
- If I have several properties, assuming no issues with lead property,others could be discounted.
- size of property and income generated from letting
- Have to bear in mind that the fees will ultimately cost the tenant higher rents and may add to the lack of accommodation if even more landlords stop letting .
- I think this is just a way fir the council to generate incomeas a landlord of a studio apartment this is equivalent to almost two months rent .
- The council should review the selective licensing fees, as they appear to be excessively high and unfair.
- Early bird...
- A discount for renting at a fair rent. Commitment to low rent rises for tenants renewing their agreements - this helps tenants feel more secure in the property
- Ring fenced to subsidise rents
- The fee should be capped at £300. For me I do not earn from my flat. The rent covers the mortgage, building insurance, yearly lease, repairs and maintenance.
- The council should consider pro rata payments where a new landlord takes over a property during the 5 year term.
- Reduced fee for everyone.
-

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Private Landlords are not social landlords and any fees associated with the property will be passed onto the tenant. I would be very happy to show my tenants that in excess of 50% of their rent goes to the management agent, the council, repairs and HMRC. All my tenants are well below market rent but I'm feeling there are easier and better ways to invest my money.
- Discount on energy rating C and above. Only a small admin fee of £100 to £150 to process the application. Not the silly money you currently charge. Landlords will pass all these extra fees down the line to tenants. Hence raised rents.
- This is too much this is like paying another council tax extortionate fees council is run very inefficiently Costs are going to be passed on to tenants with higher rents
- Land lords who have not any reports or issues should be exempted. This will encourage them and Chanel the finance in developing the accommodation etc
- Properties to be checked regularly and where there is antisocial behaviour to be policed
- As a lanlord I pass fee onto the tenants via rent, so really this should be paid for via council tax....
- Big discount for landlords who have met all standards since the scheme began.
- No or very low fees to be applied to landlords with a history of responsible property management
- Eradicate fees as they are just income initiatives
- Landlords who maintain the property and care for their tennants with no convictions should receive a discount.
- Discount of fees if tenants are NHS workers
- consider the 'performance' of a landlord (how good / bad)
- A discount for 'good behaviour'. If no complaints or issues were found in the duration of the licence, surely a renewal should enjoy some sort of discount. Conversely if a landlord has been found culpable of poor maintenance or other issue, why not add the cost of that to the cost of renewing their licence?
- Letting landlords purchase abandoned or properties in disrepair - giving them the information so they can purchase it and improve the area and provide housing. + A grant to help renovate and provide social housing Grants to help landlords improve eps.
- If the there is going to be a license than it should be for each responsible person not for each house. Multiple property owners should be given licence free. Maybe like buy one get one free or buy one get two free style so people are encouraged to let out not sale and get out of the buy to let market.
- Accredited landlords should have a discount, although if accreditation costs too much then it is largely academic. Also energy performance certificates are a joke - they take into account such things as lightbulbs, based on unsubstantiated performances. Surveyors assume
- Don't charge a fee
- Parling permits for landlords and maintenance staff
- land- lords with a proven record of supplying good quality housing, at a market proven fair rent, should be rewarded .Perhaps 5% per problem free year ,up to a max of 10 years .
- the actual amounts are far too high
- Lessen the fees otherwise rent to the tenants will be higher
- Not having a scheme
- Realistic Admin fees for licences for example £100 for selective £200 for additional.
- Multiple properties in the area
- Early bird discount would be better of around 200 pounds
- Discounts to council tax payable by tenants for accredited properties.
- Those who have broken rules/conditions before should pay more, if a licensing scheme is brought in.
- The council keeps putting up its fees but is very unhelpful
- Where a landlord is paying a reputable agent to manage the property there should be at least a 50% reduction, subject to favourable feedback from the agent.
- There needs to be firmer restrictions and checks on agents and tenants. It's becoming untenable to be a landlord now.

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

- Please consider reducing the fees. They are very expensive for the average private landlord.
- A lower rating of say D would help me I have double glazing but Victorian property so will not achieve B
- Landlords with more than one property in the borough.
- If you make examples or 'bad' landlords with double their fees with notice of improvements within specified time frame - trouble is this scheme will just make good landlords feel no point as room much expenditure taxes etc
- Landlords who already have a license and where no breaches of conditions have been reported.
- Some rental properties do not charge the tenants high rent as they have good relationship with tenants. Having a blanket charge seems excessive, it might further increase the rent.
- no fee at all
- Just cheaper licensing.
- All too expensive
- As a landlord continuing to pay out money in this scheme, but I cannot even receive a receipt from them since the start of this. I also receive zero help, but have paid so much money, but cannot show anything for that. When I pay council tax, my garbage gets taken away, trees are planted etc, but I get absolutely nothing for all the hundreds & hundreds of pounds I give you for this scheme. It's equivalent to the roads we pay to park at our residence each year, but we have to drive over increasing pot holes to get there, another payment sucked out of us but absolutely nothing back in return. If a Landlord has had zero complaints against them for each year they have rented out a property, then for each year they should be an accumulation of a discount, thus added collectively over the course of the rip off licence scheme, so that when it has to be renewed, the collective discounts are subtracted from the new way above inflation next licence fee. You take & take but you give nothing back, you continually work out ways to take more money from residence, but give less back each year. As I say I am still waiting for hard copy receipts from all your schemes I have to pay, now over many years, & you have and continue to do nothing.
- Renewal fee (where no issues) should be cheaper than the initial fee. the basic cost should be reduced. there should be no discount for multiple properties - and perhaps it should be proportional to rental income, not a fixed fee? perhaps landlords providing housing at LHA or less should get a discount to encourage the provision of accommodation available to people on benefits. A fixed fee disproportionately harms landlords who are providing more affordable homes. Doing this would also provide the council with more info on rent levels.
- If you meet the standards you should not be charged
- i think the whole scheme is disgusting, its just a money making exercise
- Discounts for accredited landlords and licence holders would encourage more landlords to seek accreditation
- Discounts should be offered to well maintained and well run properties as an incentive to continue to perform well. Why penalise good landlords. Otherwise they will simply sell up and further reduce the available supply of properties for rent
- discounts should apply to a landlord who is considered a fit and proper person, has held a licence with WF in the previous scheme and has not been subject to any enforcement or legal action including conviction, caution or civil penalty and is seen to provide reasonably energy-efficient and comfortable accommodation
- There should be no charge
- Early applications & those existing good landlords.
- Discounts for holders of last council schemes that have not had issues
- single property landlords
- Why charge as the landlords already have checks and safety paperwork governed by legislation so this additional charge bureaucracy for what end?
- Totally scrap the scheme
- what is it that a 'landlord' gets from this fee? we have no 'extra' service from the council. I strongly object to the system. My house is in good working order, it is a home and it is my

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

home that i am letting someone borrow. Some one who is 'rogue' will dodge the system anyway, not improve.

- If property is rented to low income and income beneficiaries should be considered as taking a lower rent income.
- Discount for EPC 'C' rating because most properties are very old and difficult to upgrade.
- Look for funding from elsewhere not to rip off landlords
- Those working with Councils in providing Nightly Temporary Accommodation!
- Discounts for good and proper landlords, such as offered by B&D and some other councils.
- Maybe a star rating where landlords are rated on the up keep of properties then a discount awarded with a recognised award for encouraging tenants to work together in keeping their environment clean,tidy either by the landlord supplying the things needed also allowing tenants to help decorate a space so it encourages being part of a home and not just a house.
- Incentives for exceptional standards that are maintained. Encourage landlords to regularly visit and survey their sites, monitoring properties more frequently, by Increased interim property inspection - internal and external
- Scrap the fees altogether. Cost are rising and its expensive enough keeping a property up to standard as it is.
- Penalty / staggered fees for landlords served with improvement notices who do not contact regular inspections and attend repairs within a strict specified timeframe.
- The fees should be nominal (around £50 per licence) . The problem with these schemes is that they use landlords as short term cash cows but this then feeds into higher rents. High rents are the biggest issue for tenants especially in London and these schemes simply add to this problem. I have not seen any changes in the quality of accommodation as a result of this scheme.
- An EPC rating of C should be used. An EPC of B can be difficult to achieve for older housing which is common in the borough.
- Rather than discounts for new-build developers who rent, create incentives for improvement of current stock. See comments at the end but even the Government rowed back on their proposed C rating legislation. Create a stretch target of C and see what happens. And offer grants and funding.
- See q16 please
- You are driving good landlord's out of the market.
- If properties are in good condition then landlords should get a discount
- Make the fee a small admin fee to cover the cost of dealing with the licence application.
- discount if you only let out one property and are not a 'professional' landlord - this category is being unfairly penalised already and with multiple changes and increases of costs already being placed on landlords - and then criticism about some landlords raising rents - it is becoming harder and harder to provide decent rented accommodation - and leading landlords to sell up which is driving up costs further for renters. So the cost of this should be carefully considered and its impact on tenants as well as landlords.
- Personally, I think the fee paid is a cash cow for the Council. I've lived in a property covered by the scheme for the last 10 years and its never been inspected or checked. The only time I've heard from the Council was when the landlord failed to renew. Someone was quick enough coming then for their money!!!
- Discounts only for landlords who fulfil tidy frontages, good internal and external buildings and though references for their tenants made. Then reductions are acceptable. No reductions purely because they can 'afford things', it should be given because they 'do things'
- An EPC rating of B is hard (i.e prohibitively expensive) for old housing (eg victorian), of which WF has a large number. Therefore the EPC discount is not worth striving for for most landlords. I would suggest lowering it to C or offering a staggered discount based on whether achieving A, B or C.
- I have a friend renting my property and yet I'm forced into paying this fee! I shouldn't be paying anything if its a friendly agreement with the tenant. They're only there because the

Q17 What, if any, other approaches to fees or discounts do you think the Council should consider?

property was squatted and I needed to secure the house once I got them out. Now I'm faced with paying out to this scheme!

- Don't think landlords should pay any fees. It's costly enough being a landlord with a mortgage. Interest rates hikes and no tax relief on financial costs are draining landlords. These fees are just another expense.
- As an existing licence holder a form on which I could confirm all my detail remain the same, would save a lot of admin, it doesn't cost nearly a thousand pounds a property to do this.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- The Council has proved that the private licensing scheme is a money making scheme for the Council. The Council has failed to fulfil its objectives of the private landlord licensing scheme i.e. to protect tenants and support landlords. The Council is only focused on charging fees and then harassing landlords who let good properties to the tenants. The Council is not interested in dealing with problem landlords who rent substandard properties as it would mean the Council would have to re-house tenants who live in such properties.
- Landlord profiteering should be reduced
- Again , what does this charge actually achieve other than taking money out of private landlords and tenants pockets. I agree it's good to have a standardised approach to property but I'd love to see a break down of costs and see where the money actually goes. With interest rates increasing, I'll likely have to sell my flats. Never mind council charging more. This will just add to the rental housing crisis.
- Bigger fees all round please
- This proposed fee represents a 30% increase from previous scheme and does not reflect the quality of the service given to landlords by the council. In fact the team in charge of administering the licensing scheme is utterly incompetent and only interested in bringing money into the council's coffers. My dealings with them only demonstrated their total lack of value when it comes to identifying rogue landlords and improving living conditions on privately let properties.
- Landlords are making a profit. By having a high fee they should take their responsibilities seriously
- HMO should be significantly different to single family/ owner units. The vast majority of issues are HMOs. They also tend to drive much higher profits renting per room than single family: person flats
- Newham is only 600
- HMOs are by definition against the public and tenants good and landlords profits are much higher than for standard licenses. Charitable status does not indicate good landlord practice.
- The fee should be no more than £600 for a selective licence. Landlords with multiple properties should get a discount.
- Again I feel these payment structures are not equitable.
- HMO is a polite name for a slum landlord in most cases. Tax the parasites out of existence
- if too high or idsound too low, cost will be trnsferred to rent asked of teants
- There should be no fee to let your own property. People should be allowed to let their property without intervening from council. It is becoming a nanny state and used as a money making scheme for council. I really hope my views will be listened too but I have very lity to me faith in. The council listening. I think the decision has already been made.
- WOuld expect at leats a £1000 as this is less than a months rent and should be forced to pay again if they evict tenants for no reason - Which of course wouldn't happen if the tory landlord association on the back benches hadn't blocked the rental reforms foir thier own personal gains for them and their freinds
- No fees for consistently compliant landlords who adhere to regulations
- Selective £750 to £800 EPC should not be reflective in the charge of the license the landlord will still charge the same rent regardless £400 for a charity is too low if you charge £895 a charity should be charged at least 50% to 66.6%
- What is the guarantee with these licences for provisions to the people and their safety? I haven't noticed anything in my time, so to increase the costs and EPC from current rates is unfair on all fronts, you will create more Landlords who will not pay the scheme, rather than those who are trying to show good faith and abide by the system. You want more Landlords to feel comfortable to register rather than not, pricing them out is not a good option, as most who are looking to 'save' money will not apply for the scheme and 'chance it' if expensive.
- even if licences are implemented - the fee must be "0" or peppercorn to encourage compliance, not be seen as a cash cow.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- The licence fee is too high for the work carried out. Apart from going through the paperwork, the inspectors visited for 5 minutes. This did not reflect £895 worth of work or anything near it. It's just another money making exercise by the council. Charities should be charged as little as possible because they are charities.
- Other boroughs are less
- No fee. It doesn't provide better housing conditions
- Disagree with scheme altogether
- This is simply a revenue generating scheme for the council. Its a scam.
- Once again the council are using property licensing for private landlords as a way of generating income. Most problem properties are council let & maintained.
- I have yet to understand what the benefit of the fee is and why it costs this level. I have never had any support from the licensing team. What are they spending the money on? Where is the transparency to show what we are getting in return for the fee?
- THERE SHOULD BE NO LICENSING FEE FOR LANDLORDS WITH JUST ONE PROPERTY.....Health and safety inspectors powers are sufficient to ensure property living standards.....licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- This amount could be better spent on the property rather than on the council
- Most of these charges will inevitably be passed on to tenants causing problems for other departments of the borough.
- £300
- Fee should be absolutely minimum as it will ultimately be passed onto the tenant and the rent is already very high in the area
- Any increased fee will causing the rent to increase which in return makes it harder for tenants to rent property in the borough
- This is a lot of money to pay in one go for a selective licence. It would be good to have the option to pay annually for a selective licence that's more palatable (even if it works out a little more expensive over the 5 years). As landlords of one property we are not making money on the rent, especially since the interest rate hike. Many landlords are being forced to sell because of this. So committing to 5 years for £895 seems high. Or offer a partial refund if the landlord is no longer renting out the property.
- I can only comment from my perspective. As someone who takes care of my property and my tenants I feel I am being taxed to pay for the regulation of bad landlords. There are already laws in place to ensure they provide safe housing. Use these. These schemes are basically funding g the council to do what they should be doing anyway. I know government money is tight, but ultimately this will hurt tenants as landlords will pass the costs on, and as your data shows, Walthamstow already has significant poverty levels.
- Over-regulation by the council is costly both to landlords and thus passed on to tenants and reaps nil benefit in the borough
- tenants should be charged
- If the fee is too high or the discount too low, the landlord will use it as an excuse to increase already high rents in the borough.
- This is a blatant Tax grab. Disgraceful.
- It should be in line with Haringey council. The fees are far too high for a landlord with a single property and the scouring cost of living (council tax, energy bills). These costs are only being passed onto the tenants monthly rent and making tenants worse off!
- Really we need more information before offering a comment.
- What exactly do you get for your money. £200 per flat
- As you said it is a Fee . Why do you want to charge private landlords for things that are your responsibility. As a council who already have a budget and other sources of income that is your job to insure you have the legal obligation to eliminate antisocial behaviour and insure that private landlord have enough support and encouragement as they help the local authorities to solve the housing problems. What you are proposing is to punish them instead of helping them.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- Although other boroughs charge for this, it does not mean anything! Many places do NOT charge a licensing fee so it is tempting to sell up and buy something somewhere else. I see no benefit from paying this and it has shot up in the years that it has been implemented. Money for nothing as far as I and most other decent landlords can tell. I can just about understand an admin fee but the rest is just a penalty.
- Landlords are struggling to cover cost at moment, therefore rents will have to go up to pay for this additional fee. No one benefits
- All similar type accommodation should be charged the same as we are in a market economy. The amount proposed for the licences are too much and do not take into account the landlords income. The council should not use the licensing as revenue generating scheme.
- Think HMOs should be more, and no discounts
- Why should a landlord receive a reduction just because they own several flats in the same block. They won't pass on their discount to their tenants and many won't reinvest, so this is very strange thinking unless you want landlords to make a greater profit!
- I would suggest about 500 to 600 pounds would be appropriate for the first property, or this could be the discounted rate to encourage swift payment. I think your initial proposal is too high given that rental markets in London are depressed at the moment and other areas of the country where similar rents can be obtained are not charging anything i.e. Manchester Council
- Money making opportunism and a political vote winner
- The costs from the previous scheme have gone up massively and way more than the inflation rate. In the current environment when landlords are leaving the market adding an extra cost will only reduce supply of housing for rent, increase rents and or lower maintenance of properties which is precisely the opposite at what the scheme intends.
- Good landlords should NOT pay anything. Waltham Forest has had about £10000 from me and for no benefit at all
- Why assume private landlords are less responsible than charity landlords and charge them more?
- The suggested fee strikes me as high. I am a landlord for a small flat. I'd have thought £500 would be a reasonable figure.
- £895 for good landlords is penalising them for bad landlords - landlords who cause problems should bear more of the cost. EPC discount should be set for properties with a C or above. This would encourage landlords to do more than just the bare minimum in insulation etc.
- £500 maximum
- Because it's not fair
- In comparison to other Boroughs WF's is much higher and those costs ultimately get passed through to the tenants.
- The council is increasing the fees and this is normally passed to tenants as increased rent. Tenants, many young families are being further financially squeezed.
- The charges are excessive- you will have a social housing issue in the Borough because there will be little stock.
- I don't mind to pay for the license, I have been doing it since the inception. But each time the fee increases and I am not able to increase rent in accordance. I think the current fees I paid, (approx GBP 500) are ok and would be happy for no increase and keep the cost the same.
- Fees should not be higher than £250.
- £895 for licence fee is way too much.
- This is far too expensive. No fee or very very low fee would have support.
- There should be no fee, this is just another tax on people trying to earn a living
- Think that selective licensing landlords with more than one property should be able to achieve a discount on any licensing fee. Also that this be set at C as a starting point with further incentive on a sliding scale to achieve anything higher
- A fee of £300 would be more appropriate.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- The fee charging scheme is not proportionate and doesn't deliver value for money. Costs are passed on to tenants.
- The full fees are too high - they should be around the £800 for an additional licence and £500 for a selective licence.
- £0
- As the scheme achieves very little, the fee should reflect that
- All these fees end up being paid by tenants one way or another, and you're squeezing those least able to find this money. It's a fantasy that "landlords pay". Letting a property is a business, and if costs become too high, then owners will simply exit the market, so reducing the supply of badly-needed homes.
- Think that people with one or two properties as their pension will be pushed out the market and they tend to be the people who have the nicest rental properties - this favours the big faceless landlords who in my experience don't care for their tenants
- This is an enormous increase from the previous fee. Landlords who are responsible and meet all the requirements should not be forced to pay such a huge sum for a scheme that is intended to deal with miscreants.
- As noted in above comments, the overall fee increase to £895 is too high. The discount threshold for discounts connected to energy efficiency is also too high and should apply to properties with a C-rating.
- A selective licence should be no more than £400 for 5 years. I think a much cheaper system needs to be devised. The last licence lasted for a maximum of 5 years and was £500. But since then taxes and mortgages have increased massively and I'm renting at a loss. I can't afford £895! Discounts should be offered to landlords based on their costs, the rent they are charging and the condition of their rental properties. Not all properties can realistically improve their EPC rating to A/B especially flats so discounts should be given to those who are no more than one rating below the best rating they can reasonably hope to achieve. Does the borough want good landlords to raise the rents on good hardworking tenants and potentially price out people earning the average salaries of teachers, nurses, social workers, local government workers, etc.? Because private landlords like myself who have the same jobs and bought property to improve their pension income in the future are not money trees that can be endlessly shook no matter how good the Council's intentions may be.
- There were duties covered in existing council tax fees prior to introduction of licence. This fee seems to be in excess of additional costs of running the scheme. Another stealth tax that will be passed to tenants.
- These fees are far too high. They will just be added to the rent and passed down to the tenants further pushing up pricing
- Landlords have been penalised with B2Let mortgages soaring, if a license has to be paid for I think it needs to be dramatically lower. I have another property in Essex where no licence fee is charged. It appears that due to the failings of the Council in WF that once again it is the Landlords that suffer, where are the Council when Landlords like myself get their properties trashed, no where, they are not interested, all they want to do is cripple us. If this fee goes up to your planned level I will probably put my property up for sale putting a family out of a home but I just can not continue with all the additional costs.
- Your previous selective license scheme, albeit at the introductory, discounted rate was £450. Allowing for reasonable inflation this should be in the region of £550 - I see this as a more reasonable amount. Manageable without having to pass the costs on to tenants with rental increases.
- All these fees aren't charged to the landlord. They are all passed to the tenant. The richest in the borough should help support the poorest.
- Difference between fee amount if have EPC of B should be higher to incentivise insulation improvements
- Should not pay the council any money. Landlord should pay a letting agent to manage the property
- This seems higher in comparison to the neighbouring boroughs? I think it depends on the area and resource needed.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- This money is not used to make properties better it's used to employ more staff and put money in the council budget
- The fees are ridiculous, high as a landlord and I'm sure most will raise the rent so tenants will lose out
- Most landlords are under price pressure and will pass costs onto tenants, who themselves are suffering high costs.
- £900 per property is £75 per month - this is simply passed on to the tenants. That is a lot of money for dubious returns where a landlord is doing his job well.
- Same reason as above - landlords shouldn't be incentivised to own multiple flats. We know that tenants will not see a reduced rent from this.
- If the fee is 5% of the rent, the landlord might bear that without increasing the rent. If it is any more, then it is likely to be passed on to the tenant. Fees should also be linked to the number of bedrooms.
- There should be no fees. The improvements works are excruciatingly painful, stressful, and unjustifiably costly as it is. Landlords are normal people, usually living frugally to afford a 2nd property and ensuring it is at a good standard. This is putting Landlords off from 'being in the business'. Pushing up rent. Causing a housing crisis. Rental properties are saturated with laws, regulations, policies. None of these requirements get applied to regular homeowners. They just use regular common sense to not burn their house down for example. and are more careful, and more attentive. As they have worked hard to raise funds to purchase a home. There are other solutions to ensure a home is fit for purpose without imposing huge financial burdens to all involved. Whilst the council sits back and collects fees and penalty payments and doing very little. It occurs as though Council properties are in worse disrepair than privately rented properties.
- We only rent out a very small studio and the rental income is not that high. For a single property landlord like myself who does not earn a great deal of income, a fee of nearly £900 is extortionate. It's hard to know what to suggest but I guess the previous fee for the 2020 to 2025 period of around £500 (it may have been a bit more than this, can't remember now) seemed fair.
- Landlords need to be more accountable for their HMO tenants, if charged more they might take more responsibility for the people they let to.
- See my answers to Q16
- Don't you already collect council fees?
- The discount for subsequent properties should be 50% of the full licence fee
- The council should be enforcing existing legislation not creating more paperwork. The fees are RIDICULOUS. There is no possible reason it costs £750 to read an application form - even if properties are visited (which mine was not). It's simply a cash grab to bolster underfunded councils - at the expense of decent landlords, since rogue ones don't bother getting the licences. If the scheme worked, there would be no poor quality housing in WF; it's been running for more than 5 years and it's very clear that nothing has improved - with some of the worst being council / HA run. Get your own house in order before charging us exorbitant fees.
- This extra tax licence is a big con on all good landlords
- Fees should be refunded if no issues are reported.
- They should all be higher, to help pay for more inspections officers.
- see my answer to Q17, also I am concerned that if the Council is able to recover all the costs of enforcement from the licence fees it may not make any real effort to recover costs from the parties against whom enforcement action is taken. I would suggest Part A should be as proposed but Part B should be about £100 per year.
- As I said above I don't think a discount should apply to multiple properties as each one still has to be handled separately in terms of inspections and checks etc
- Landlords should pay more to ensure they are financially capable of being a landlord.
- No consideration is given to the unethical tax treatment of landlords whereby they are assessed on turnover and not profit. These additional fees place an additional burden to already strained cash-flow positions.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- no fees at all , it makes rents go higher
- The costs will be passed on to the already struggling tenants
- Charities are just a scam they should pay the same,
- Rental cost which are currently too high is worsened by the money making and extortionate cost of rental licencing in Waltham Forest. The current incessant drive to generate more money by the council (to run other council activities) though licences fees will continue to drive down availability of housing thus further worsening rental cost/affordability.
- Look at other boroughs...! Also think of the existing costs and restriction on revenues for landlords. Do you want to drive all decent landlords out of the market??
- This fee is exploitative. It's not an effective idea and is forcing squeezed landlords to put up their rents to cover these additional nonsense taxes.
- With the cost of living as it is, I have not increased the rent for years (pre-covid). I have good tenants who look after the property and respond efficiently and effectively to any concerns they raise. The fees proposed are way too high and will definitely veer me away from Waltham Forest as a landlord
- What benefit is the landlord getting from council in return for these fees? Will council help the landlords in case of evictions? Will council support the landlord if there is a non paying tenant? Is council going to help the landlord with property damage to a small landlord
- I think the prices are about right when the usual 'early bird' discount applies.
- I disagree with discounts for landlords who own multiple properties as in my area they happen to be the ones who do the least repairs/remedial work on dealing with persistent damp,fence repairs, asbestos removal and overgrown trees affecting other responsible landlords+ owner occupied properties.
- Not sure why this fee is applied never in the 10 years of licencing had a visit to my property wonder what i am paying for
- £1,200 for a HMO makes sense given there's multiple renters providing income to the landlord. £895 is relatively expensive to that as the rent would only be from 1-2 earners.
- I'm resigned to whatever you have determined is appropriate.
- The fees should enable WF council to increase enforcement and inspection so that no renter in WF lives in an unsafe home. This should include stepping up public awareness campaigns about renters rights and how to report unsafe homes to the council, increased use of improvement notices to protect renters from eviction, working with renters advocacy organisations etc. Landlords should be told that since they have caused this problem, they should be paying for it.
- The previous selective license fee was in the range of £500. I strongly believe that there is no justification for a hike to £900 as in this new proposal.
- I think that landlords could be put off by these fee's. What do the council give back to the landlord . We provide a service to the Borough. We pay tax for renting and then pay out for a licence ? We could buy in neighbouring Essex and not need a licence. Make it equitable for all Landlords and not those who are just honest and pay up. You have no idea who is renting who the landlord is and make the system fool proof first.
- Good causes should be rewarded. A single property being let by a landlord as a side income shouldn't be punished with a high fee. Landlords with multiple properties should be paying a higher fee.
- This is an additional burden on landlords
- As long as the scheme is self-financing, the fees are appropriate.
- As this scheme has been running for sometime surely there is less for you to do? Afterall in 10 years you really should've made huge headway in battling ASB and rogue landlords. Your workload must have decreased
- Its unfair cost for the Landlord and ultimately the tent to pay. They system was just fine before. Its a shame someone has came up with this scheme and charge for it it. If its for safety there should be no fee. It appears its just a money issue. It has no benefits for the Landlord or tenant
- I see no reason at all why charities and/or professional landlords should be given better deals while the smaller landlord with just one propery is persecuted by the council.

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- There shouldn't be a fee, it gets passed onto the renter eventually
- Put up fines for bad landlords
- Eligible charities should pay more than half of the fee, i.e. £500 - 600. Just because the landlord is a charity does not guarantee excellence.
- Council should can support environmental initiatives by excepting fee or give large discounts to better rating properties to increase landlords to improve housing conditions.
- the fees are a waste of money to a landlord - an extra cost that gets covered by the tenant - AGAIN ! - else encourages a sell up
- Fees seem like a tax.... Given the issues we have had with the planning department, I dislike paying more fees to LBWF.
- Far too much when there will be a portal with all info on with the Renters Reform Act which will no doubt have a fee.
- I would have thought that a charity trying to help accommodate people should be exempt.
- You are suggesting that a small studio flat with a rent of around £600 a month should have to pay the same fee as a two or three bedroom flat with a rental income of double that. It should be based on rental income. If you are going to give a discount for more than one property it should be borough wide not just properties in the same block.
- £895 for a Selective License feels punitive and is likely to discourage landlords from investing in the borough
- Look at other borough's pricing fee!
- These fees are a penalty on good landlords. Non compliant landlords won't be applying for these. The fee shouldn't be for the council to build a war chest to tackle non compliance it should be based on the cost of the application process which is minimal - it can't take an administrator more than a couple of hours to check each application - this rate is far in excess of that.
- I suggest a flat fee of £300 if any. Not everyone is in this to make money, for me personally this flat I own is for my son who is currently at university. Once he start working he will take over the flat and change it to a residential and this will be his home. I repeat, I do not make money on my flat, the rent covers all the expenses.
- Fees will never recompense the council for any work undertaken. Fee should only be to assist with the immediate administrative costs. High fees are looked upon as revenue collection and unfair.
- £500
- The fee is far too high for the service provided. This will encourage landlords to increase already high rents and pass the cost on to the tenants The service provided is very poor and if there is a problem it is impossible to contact the council.
- Nearly all my tenants receive housing benefit. Therefore the council is paying this charge
- As a responsible landlord I do not see the need for licensing. The only time that I have been contacted by the licensing department was over an issue which had not been notified to either myself nor to the managing agent. You should have ascertained from the tenant immediately whether they were coming to you as a result of a failure on the part of the agent or Landlord to take action. As a responsible Landlord I see no benefit from the licensing scheme
- Discount on energy rating C and above. Only a small.admin fee of £100 to £150 to process the application. Not the silly money you currently charge. Landlords will pass all these extra fees down the line to tenants. Hence raised rents. Stop ripping of landlords and using them as Cash Cows. We work bloody hard and the selective licence is daylight robbery!!
- This is too much this is like paying another council tax extortionate fees council is run very inefficiently Costs are going to be passed on to tenants with higher rents the council is fleecing both landlords and tenants with higher rents and costs please get rid of the council
- I am Of the opinion that no lincencong fee is the be charged for landlords who have a track record of maintaining their homes with not action taken against them in the last 5 years
- I have had a license since the scheme started and have never had an inspection. My property is managed by an agent and regular inspections are carried out. The same tennants have been in situ for 5 years. The property is regularly maintained. So what does

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

£900 cover? I think £200 is more than enough in my situation as it is basically a roll over from the old license scheme

- just do it pro rata, no discounts except for 'performance' of landlord
- Not sure why landlords who have the greatest income should be given a discount
- There shouldn't be an additional or selective licensing scheme at all. But if there must be, it should be around half this cost and payable by direct debit.
- As already said, I think the landlord should be licensed (for a decent fee) and then each property demands a modest fee.
- This is a high amount for a landlord to find for a scheme that appears to be of little benefit. legislation is already in place re gas safety, electrical safety etc. landlords have to abide by a plethora of constantly updating rules and if they have problem tenants the onus is totally on the landlord. I have had to take my tenant to court to get them evicted, which took many months and allowed them to continue to damage the property. I got £1600 deposit back and have had to spend thousands repairing the damage done to my property. the property had been totally re-decorated prior to their tenancy, and during the tenancy a new central heating boiler was installed as I was advised the existing one which was under a British Gas service plan was now hard to find parts for. The cooker was replaced with a new one. My house was returned to me filthy, full of old furniture and bags and boxes of rubbish - some mostly rotting, with damaged ceilings, flooring, electrical sockets (kicked in) kitchen cupboards (kicked in) red paint and silver spray paint on doors, carpets, radiators, patio door locks smashed beyond ability to repair - new doors now purchased. Kitchen diner floor tiles smashed - floors now screeded and new vinyl laid. New carpets throughout and repairs made to electrical outlets. several months void period (during which I pay you council tax) Countless trips in my small car to dispose of rotting goods and broken furniture right across the borough to the only tip that takes non-recyclable waste. I get no benefit from the scheme, but then I'm a landlord that tries to abide by all rules. I'm giving letting my property one more go - but I think there will soon be one less rental property in Chingford. This scheme appears to penalise good and bad landlords equally - but I suspect it will only get rid of the good ones.
- Due to the cost of living many tenants are struggling to pay the rent. Landlords have also been charged further tax due to the changes HMRC have implemented. To add an additional cost of £895.00 for the licensing scheme is extortionate considering the same scheme was discounted at £250.00 when it began. How do you justify the fee of £895.00? Furthermore where does this money collected get allocated within the council's income budget? Properties that have concerns should require a licence and have inspections carried out annually. Landlords that have maintained their properties in good conditions should not be penalised with extortionate licensing fees. Waltham Forest Council should work with the letting agents to provide a list of properties that are in good condition and have all their paperwork in order and are following legislation. The fee for the landlords that follow the law should be £100.00. The licensing scheme should target properties and landlords who are not providing safe accommodation to residents and charge them a higher fee. The licensing scheme should be a targeted service for landlords and properties that are not following the law.
- This should be funded solely by revenue received through penalties if the scheme is that good.
- The total exclusion housing associations and discount to those owned or controlled by charities is completely wrong . Some of the worst housing and tenant behaviour is in this sector. We have personal experience of this in one of our own buildings.
- this is purely revenue generation
- The costs of licensing is not reasonable. The landlord uploads all documentation and is given a licence the cost associated is far too high.
- Present fees for present licencing are fine
- Could you provide a breakdown of what I am getting for the money and also what is the cost to the council of issuing the licence.
- You have not defined an eligible charity, and this can be abused by landlords and make the costs of administration higher. Secondly i disagree that there should be a sliding scale

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

discount for multiple properties because it encourages large property lettings businesses while disincentivizing / disadvantaging small / accidental landlords, while you have not provided evidence that a shift towards large property landlords is a good thing for tenants.

- It is unclear in the questions regarding B rated properties whether you mean the charge is too high or the discount.
- Landlords aren't making profits anymore. With rise in mortgage most are either making a loss or just paying the mortgage off. I'd rather sell up and buy somewhere without a scheme than carry on here and this is has been in our family for 50 years
- There shouldnt be a fee period for Landlords who have high quality rentals
- A selective licence should be 200GBP per property.
- a selective license of £500 with additional licences in the same borough to be £250
- These are exotriante fees, that only get passed onto tenants. The cost of admin of the scheme by the council is out of control and do not reflect in anyway the ttrue cost of administering it. And is just another revenue stream for the council. And hitting privtae rental tenants.
- This fee should only apply to those landlords assessed as not complying with good conditions
- The fee for selective license for private landlords who do not over charge and keep their properties in good condition should be less than £400. They are not the cause of the problem that is mentioned in the questionnaire. Those with exceptional epc rating and involve charity should not be charged.
- charities hiding money
- Extremely expensive pushing landlords out of business
- If a landlord has more than one property in the same block it is ridiculous to charge the same amount for each flat, when you already have him registered on one flat, therefore having him/ her/them responsible for all the properties. If he/she/they own separate dwellings but not in the same block then that is different & therefore can be looked at differently. However, charging them in the same block exposes either greed or your inability to manage, therefore that is not the landlords fault. I just like to add, I DO NOT own dwellings in the same block & yet that is how I feel about your miss management.
- The licence should be £200 for private landlords or not at all.
- These are additional running cost. With landlord tax so high, cost of renting will be too high.
- This would put rents for tenants
- 895!!! thats shocking!!! its more than a months rent!!! the whole scheme should be scrapped
- Discounts for charities means non-charitable landlords are subsidising them. The proposed discount is too large. Also charities should be given the same incentive as other landlords to achieve energy performance of B or more. Charities should pay £900 fee for EPC below B and £600 fee for EPC of B and above
- As I said earlier this is a money making issue and is one way of removing the last of the landlords
- Fees are too high currently, so such a large increase is going to force a lot of private landlords to 'go to ground' and avoid paying and implementing the necessary conditions for their tenants. There should be a differential between a one-property private landlord and a multi-property owning company or charity.
- There should be no charge
- £750 maximum.
- Overall the fees are too high. What exactly is the justification for these costs? £600 was bad enough, now even higher?
- Remember those fees have to get passed on to tenants. 500 for a 5 year licence seems much more reasonable
- I feel the fee should be £695 for a selective license and £1000 for additional HMO
- Costs will ultimately be passed on to tenants
- At a time when the property market is rock bottom adding to costs unnecessarily. The outcome would be properties being sold & less to rent

Q18 Do you think the proposed fees are about right, too much or too little? If you said 'too much' or 'too little', please explain your answer and the fee level you would suggest

- Why can't the costs of enforcement be placed on rogue landlords not spread across the good ones?
- £300
- I think that properties already registered under the current scheme should definitely not be charged this high amount for renewal. I would suggest £400 for a renewal and £250 for a property with energy performance certificate of B or more. I don't have experience of HMOs but think it only fair these be lower as well
- The fee is so expensive - I will increase the rent to cover it so the tenant will end up paying more rent.
- Until the Council can demonstrate some real and tangible value for landlords I would be inclined to think it is not worth it at any price.
- You are driving good landlords out of the market.
- The fees are too high, assumes landlords are simply a cash cow. I think the current fee level should be maintained.
- Landlords already pay taxes on the property they rent out, this is an additional tax punishing landlords.
- It's needs to encourage good landlords and properties and has increased drastically since it started. £300-£500 would be better to encourage landlords
- As per my opinions previously, the council should not be making money from good landlords who are complying with regulations. Resources needs to be directed to finding the landlords who have NOT applied for a licence, giving them the opportunity (and a deadline) apply for a licence and then fine them if they don't comply and apply in time.
- The fee's are much too high. A one bedroom flat is rented for roughly £1000 - £1250 in Leytonstone. This fee is almost a whole months rent. The fee's should be allocated on sliding scale depending on the size/ no. of bedrooms to make this fairer to Landlords that let small properties.
- As per my previous answer, I think there should be a discount if you only rent out one property and are not a professional landlord. I think that if there is going to be a free it should be a maximum of £400
- The reasons for these discounts will not benefit the areas but only the landlords. Discounts should only be given for beneficial reasons to an area not for a landlord. You have an opportunity here to improve Waltham Forest and in doing so earn more money by making the areas more attractive to potential self sufficient tenants if the aesthetics are raised as well as the property quality. Discounts for higher visual impact and higher quality only benefiting the tenant and ultimately the areas
- The standard fee is too high -it will discourage some landlords from getting a licence ie dodgier landlords will be driven 'underground'. There should also be an early bird discount for applicants as in previous years
- These added costs will raise rent charges to the tenants because the landlord will pass it onto them! I think we need to keep an eye on properties but at such an expensive cost will only make it more difficult for landlords as well as tenants
- It seems so arbitrary. Why so high?

Q19 Do you think that the proposed selective licence conditions are sufficiently clear and understandable? If 'No', please state which conditions are not clear and why

- Too vague and not measurable.
- They're always written unclearly and deliberately so in order to catch landlords out and fine them - making more money for the council.
- It should be made clear that 'Leasehold' landlords are required to comply with the requirements of their leases before being allowed to sublet to private tenants. This should be part of the definition of a fit and proper person.
- Far too much paperwork required for a landlord to rent their property.
- Examples need to be provided to practically explain what it actually affects landlords and tenants alike
- No need for additional conditioning imposed by council
- They don't solve the problem of there only being two options for tenants - asking nicely or taking your LL to court. Any scheme should force landlords to proactively maintain properties at a good standard. Just because they have no record in the courts does not mean they are suitable to provide housing. All measures are also worthless without rent caps and whilst s21 evictions exist anyway but I understand WF can't do anything about that.
- I do not think that enough effort is given to inform tenants of their rights .
- Regularly visiting properties? A SMART goal would be lovely here - in the 5 year period we aim to visit 25% of all registered properties and 1,000 homes we believe to be unregistered. There is a lot of air in these statements - the sentiment is great, but the delivery is unclear and can mean anything from 1 visit to 1,000. What measures to enforce anti-social behaviour? Etc..
- too many obligations and responsibilities are simply being passed on to landlord.
- too complicated with all regulation etc
- Far too much paperwork containing too many 'jargon; phrases.
- These are laws. They are not "terms" You HAVE to do all of those things legally anyway. What is it that the license is asking of landlords that the law isn't already? Define "Fit and Proper"
- Council use the condition towards their personal agenda and produce an income for themselves
- Not clear why the council thought that this is in anyway appropriate.
- Too complex and unnecessary
- I think there is a lot of subjectivity involved in assessment. It is difficult to determine a baseline.
- the guidelines for HMO's are vague and hinder the landlords ability to keep the rented house
- No - there were no letters or emails sent to Landlords informing of this scheme and the early bird discounts available. Letters only appear after the discounted period has finished
- I do not understand what they mean and what any legal consequence is, except I have to pay a penalty. My tenants would never even bother to repair anything. I even had to send an electrician to change light bulbs. If ASB occurs, the police should deal with the matter. Etc.
- Landlords should not be paying for this service we are stopping the council having to find accommodation
- Should be in clear easy to understand language
- The difference between selective licence and hmo in small properties is very confusing. Even for the licence providers!
- Yes but you don't seem to check on whether people are complying. They seem to be just a threat.
- Just add to the cost of running and renting property.
- The conditions are too excessive
- It's a lot to take in , all you need to cover is the electric and gas certificate, and a good standard of property with a fair rent
- All of it. The wording is deliberately vague and confusing.

Q19 Do you think that the proposed selective licence conditions are sufficiently clear and understandable? If 'No', please state which conditions are not clear and why

- All good landlords will be providing the information outlined as a matter of course and would be able to provide, it is unfair that good landlords get treated as bad by default
- Too detailed.
- Does not cover Airbnb type lets explicitly
- It's not clear what the responsibilities of the Council and the freeholders are in supporting landlords who want to address anti-social behaviour and other problems that are not directly within the control of landlords and/or their agents. Such as garbage collection, pest control, the maintenance of common areas, security, parking, vagrancy, etc.?
- I understand them but it does not mean that all Landlords do. A downloadable booklet should be made available for each Landlord.
- you need a professional to translate them
- Verbose and bureaucratic
- As officers of the council do not know gas safe, electric regulations or building regulations and that most regulations only apply to new builds or renovations
- Making sure the landlord and/or licensee is fit and proper - where is the definition of this? This is entirely subjective and left to Council Officials to decide. Ensuring that all reasonable steps are taken to prevent and deal effectively with anti-social behaviour (ASB) - just how do you expect landlords to handle cases of ASB? Eviction? Warning before eviction? And the landlord gets prosecuted if he cannot control his tenants? Surely the people committing ASB should be prosecuted?
- What constitutes a HMO. The advice given by the licensing team does not correspond with LBWF guide to renting. Also very unclear how to change a license status once it is granted. The relationship between planning/ planning permission is not clear or explained. And the planning teams are actively not aligned with licensing. Although there is a co dependency.
- From the consultation document I could not see any specific conditions to be adhered to. Maybe in another document or in the licence application?
- None of it is. All trying to catch people out
- There is confusion on the terms of the licence. There should be clear advice and examples of the licence do's and dont's leading to clear understanding for the licence holder.
- unnecessary - existing national legislation covers all the conditions.
- Yes because good landlords have to pay for it
- The document as whole is too long
- Was is meant by reasonable
- No rentals
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- The statements are too vague. Specific property standard details are needed as people's ideas of acceptable are very different.
- How is it helping the landlord who is paying the fees?
- Use plain English. Too long and too wordy.
- One fee per landlord
- Conditions are difficult to understand.
- As generalisations, they're mostly inarguable, even if a little insultingly worded to those of us trying to do it all properly. However there's no detail; eg how exactly will a landlord be deemed 'fit and proper'?; what are the criteria? ; and there should be clarity around the relationship between landlord, letting agent and tenant responsibilities.
- Not clear how neighbours with concerns can get help
- Should adopt the KISS principal
- There is no information to let those who wish to let know this even exists.
- Asks for too much information make it simple
- Often unclear
- There's no need for them just another cash cow for the council
- You must surely be aware the worst landlords are those who are completely unknown to the council

Q19 Do you think that the proposed selective licence conditions are sufficiently clear and understandable? If 'No', please state which conditions are not clear and why

- It's confusing and it's a tax grab.
- Nothing is.
- I don't know why it's needed, how it's regulated or how comparably regulated it is with council properties. I have had so many issues with the council tenants in the property below mine (anti social behaviour, rubbish strewn outside the property etc etc) that took AGES for the council to sort out. It seems disproportionate to be charging me as a private landlord then doing what you like as a council with tenantsd properties. Extremely unfair.
- Once I received licence , I don't think anyone cares about property and tenates , it's another way generating revenue in return for nothing
- Far too many rules affect housing shortages
- Where you mention about paying £895. This is daylight robbery for persons who only renting one flat. Why not go after persons who are doing this as a business.
- The rogue landlords are not going to comply and decent landlords are penalized.
- Tenants should be aware that they are paying for this.
- Over complex
- They are clear, but doesn't state what are you obligations
- It is unclear how landlords are expected to be made aware of the incidence of ASB.
- Every time I go to click on your links I have go restart the questionnaire
- whole mess with planning approval
- Too complex
- I have already gone into this
- ASB is extremely vague - can mean anything really.
- Every time we struggle to complete the form. It is unclear and ambiguous.
- why have them in place ? it is an extra in flux of money for the council and no benefit of extra support to the landlord. Mortgage rates are at an all time high. i havent passed this onto my tennant. if extra costs are placed on landlords, this in turn will push the rents up in the borough, so you are not improving the lives of residents at all, everyone will be more financially stretched and dissatisfied with the area. even seeking to live in more affordable loactions.
- See comments at end, but a lot of generalisations about how the PRS has a negative effect on the community. That same unsubstantiated claim could also be levelled at the Social Housing sector. These gross generalisations also extend to overcrowding, littering, flytipping.
- When I applied for my licence, I was not told it would end in April 2025. In fact, I paid for a 5 year licence and the expiry date is 2027.
- When I applied for the selective licence when it was launched, I was (over the phone) that the fees for selective licence and HMO were the same and that during the 5 year duration it would be possible to switch between the two licences for no additional fee. I subsequently learned this was not the case which was frustrating.
- There should not be a selective license requirement for non HMO
- The whole format is not clear, except to a lawyer. What the hell does it mean? Corporate-speak designed to cover your back whilst deterring people from reading. Hence, my following 'don't know (can't be bothered to wade through the jargon) answers.
- What constitutes "fit and proper"?

Q20 Are there any proposed selective licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why

- Anti social behaviour can only be dealt with by authorities, not private citizen landlords.
- Need to specify that they should not have any bans. In line with the planned changes with the renters reform act which is going through. It would be good to specifically specify that they must not be found to be discriminatort towards those with kids and single parents. At the moment many are blatantly discriminatory. This must be stopped and the council needs systems to monitor it.
- people who are unrelated as it is not reflect today's society
- Something where tenants can record issues with LLs e.g slow response to repair or maintenance, rent rises, inspections, gas safety checks so there is a paper trail of the LL's actual abilities and attitudes which is not purely based on criminal nd civil court and financial checks
- property inspections. these are already carried out by competent landlords and tenants are often negligent in reporting problems because they don't want to be held accountable. Also further visitations from the council is further disturbance to good tenants. Hindering their enjoyment of their home. I already feel I'm doing this under the current regulations. They don't read the forms and aren't interested in filling them out generally. It's all red tape the tenants nor the landlords want.
- too many obligations and responsibilities are simply being passed on to landlord.
- All
- Disagree with selective license so obviously I think that the conditions shouldnt be included
- the tenancy agreements already incorporates the process of maintenance and its notification. To require to individually furnish these and others are bureaucracy gone banana
- licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- Shouldn't be a licence at all. No benefit
- Where a licenced managing agent already does this, an exemption should be granted and no proof should be required.
- ASBs are almost always beyond the control of an individual landlord and their use should only be enforced by swift and strict action from the council.
- Any fees/fines
- How is a landlord supposed to deal with ASB? Our only power is to report to police and / or evict tenants. Are these the best solutions?
- There should be no license
- All of them
- Having to keep waste and recycling information given to tenants for 5 years - should just be for the duration of the tenancy at most. I also think it's really the council's job to provide this info to all households whether rented or privately owned. I would bet that most people who don't dispose of rubbish properly would not take any notice of leaflets etc anyway!
- All of them
- I don't understand the ASB element at all. Landlords have limited recourse to removing ASB tenants. The section 8 process is lengthy, costly and unpredictable. It could have a discriminatory effect similar to that of not allowing benefit claimants. Landlords will not take the risk and ASB tents have to be housed somewhere.
- Property meeting good standard should receive 10% discount
- The thing about the energy rating.
- No fee should be charge
- Electrical conditions of appliance testing impractical, waste of money,
- There is no need to regularly inspect good tenants. It is very intrusive and unreasonable .
- i just dont think you should have licenses
- Anything that is over and above legal requirements. You should not be allowed to go beyond UK statute
- All of them
- There is a lot of duplication with other legislation already in place

Q20 Are there any proposed selective licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why

- private rented properties have these requirements covered by Assured shorthold tenancies - why duplicate requirements.
- There sound not be a licence fee the council Does nothing to warrens the fee
- It's a lot of questioning it makes the landlord feel they are a criminal and doing wrong
- The written statement of how to deal with maintenance issues or ASB
- The external condition of the property should be properly maintained
- All of it.
- All good landlords will be providing the information outlined as a matter of course and would be able to provide, it is unfair that good landlords get treated as bad by default
- Many of these conditions (and many of these proposals in general) are inappropriate for small private landlords (who might have only one property or may be wishing to let for a relatively short period). Increasing the "admin" involved makes the whole prospect of providing someone with a home a much less attractive option, and may reduce the number of properties available to be let.
- EPC Since taxes and mortgages have increased massively and I'm renting at a loss. I can't afford £895! Discounts should be offered to landlords based on their costs, the rent they are charging and the condition of their rental properties. Not all properties can realistically improve their EPC rating to A/B especially flats so discounts should be given to those who are no more than one rating below the best rating they can reasonably hope to achieve.
- A lot of this stuff is in the rental agreement -Holding a current gas safety certificate./- Ensuring smoke alarms are provided in the house and are kept in good working order. Some if it is common sense: Providing occupants of the house with written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. And a lot of it is unenforceable: -Ensuring any repairs or maintenance are carried out quickly and by competent persons. - Regularly inspecting properties. - Various measures to deal with anti-social behaviour associated with private rented properties. What is the definition of quickly? My ceiling fell down on a Thursday night .I couldnt get anyone to patch it up until Monday morning. How are yo going to know how many time I visit the property??
- I think Landlords using Letting Agents should not have to pay the licence fee as many landlords are paying uo to £3000 pa
- Anti-social behaviour as it's not directly under the landlord's control. It would be awful to be sanctioned, through no fault of the landlord, based upon the actions of others. Focus the license on property condition and up-keep. Absolutely seek support from the landlord to help with anti-social behaviour, but don't make it risk their business.
- ASB -why should landlords be penalised for this?
- Most if not all landlords vett their tenants no one wants a bad tenant , I want my tenants to look after my property as their own. No one wants night mare tenants and I don't need to get a license t do this, your council tenants and properties are the ones you need to worry about
- Requirement for electrical safety inspections every 2.5 years seems ridiculous. 5 would be more appropriate.
- Fit and proper - and ASB enforcement
- Energy level should be C or above.Impossible to achieve a higher rating on older property in WF
- I do not think conditions relating to ASB should be included. A landlord has very limited options for eliminating ASB except for the draconian measure of threatening eviction. The proper bodies for tackling ASB are the Council, police and justice system and they should deal with the offenders directly. I see no reason why the Council should not, for example, fine the occupants of a house for waste in the front garden.
- Separate hmo fee
- There are none that shouldn't be included, but it would be helpful if the Council could provide written guidance and support to landlords on what to do if there is anti-social

Q20 Are there any proposed selective licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why

behaviour from the tenant or their guests. What are landlords supposed to do about that? Do you have guidance?

- It's not your business to know who is renting what property and whether they're living alone or as a couple. It's state interference and will ultimately penalize those living alone and unmarried. How is it the councils right or business to interfere or monitor individuals like this. lastly, the market determines the condition of housing. How does applying a license fee for dwellings rented to individuals or non-married couples help with anti-social behaviour or anything at all? All it does is increase your budget. I disagree with the entire thing. It's a shameless money grab.
- Planning permission should be given to convert larger houses to HMO and remove article 4
- adding a friend and obligated statement from the proposed tenants on their status if they are a couple + friend / cousin etc. on start of each tenancy and renewal to ensure there are no assumptions and the licence is renewed under good faith.
- None of it is necessary - all covered by existing legislation.
- Licence should not exist
- Please see my answers above
- Tenant Responsibilities to maintain property
- There shouldn't be a need for a landlord licence
- placing a burden on the landlord for the behaviour of tenants
- More penalties for repeat ASBs.
- no fees at all , it makes rents go higher
- I have concerns about the council overreaching
- regular checks of the property and tenant engagement documentation to ensure that the property is being maintained.
- No rentals
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- All of them. Provide a service for tenants to report issues that landlords aren't dealing with.
- It's all about the tenant who is not paying any fees , what help is given by council to landlord in case of tenants being on the wrong?
- Remove separate licencing conditions, landlords should (and are) obliged to meet safety standards such as gas safety certificate, electrical safety certificate etc. landlord licences not required in addition to this.
- The charging of fees on those tenants on housing benefit
- EPC B
- Landlords should not have to provide a testing record of electrical appliances beyond the 5 yr electrical safety inspection. I believe this is completely unnecessary. The landlord should not be held responsible for waste/rubbish disposal - that should be the responsibility of the tenants. Some of The proposed conditions are too detailed and not essential - the tenancy agreement should not have to specify conditions beyond the existing ones. It is unfair to expect that tenanted properties should have a higher standard of conditions than the owner occupied properties. The requirement of a receipt of rent payment is frankly ridiculous as this is a private transaction between the landlord and tenants - I simply don't understand why the council should be provided with this information. All responsible landlords will provide HMRC with their rental income details for tax purposes.
- Not sure how you expect landlords to manage ASB. Especially with the proposed abolition of section 21.
- Yes, you should set out minimum property standards if you really want to address poor housing conditions, but you cant as that is not the grounds on which you are apply for the scheme.
- all fees should not be included
- All of those that are not a legal requirement for private homes and not standard in council properties either !
- All of them
- Safety certificates

Q20 Are there any proposed selective licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why

- lender details - writing to the lenders is a reason i would sell up a rental property - its damn hard as it is without you interfering with this to top it all.
- Landlords have no rights to control the social behaviour of tenants and could be guilty of criminal offence.
- I don't think there should be licensing. In my experience over the last ten years the council has done nothing to justify paying a licensing fee.
- Unfit landlords or overcrowded properties
- Blanket conditions are intrusive and unnecessary. They could also be said to be ultra vires - beyond the purpose and scope of the initial legislation. The Council should only impose conditions on landlords who have shown to be problematic landlords. Previous issues etc.
- As a responsible Landlord I see no benefit in the licensing scheme
- This is too much this is like paying another council tax extortionate fees council is run very in efficiently Costs are going to be passed on to tenants with higher rents
- Licence exempted for tenant working for NHS
- Providing occupants of the house with written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. Too administrative. -@ Regularly inspecting properties. Invasion of tenant privacy.
- General simplification
- There should be none
- "A failure to comply with a licence condition without reasonable excuse is a criminal offence." This is excessive and on the surface appears unconstitutional as it appears to give LBWF legislative powers. "...keeping written records of any ASB-related documentation for a minimum 5-year period." Why?
- All of it
- A private landlord cannot be held responsible for anti social behaviour. Thier only solution is eviction which takes a long time and does not solve the rot cause of the problem.
- The council should not interfere with communication with landlord's tenants. As a licenced landlord I can effectively communicate with my tenants regarding repairs etc
- Properties should be assessed if merging criteria a simple £150 license is issued - if at anytime property fails then increase fed to £860 with 6 month rule go comply of face fines/ court etc make examples of bad landlords - don't lump good landlords in as we comply
- Can only pay the fee by card, why????
- Individual landlords whose properties are well maintained. Most boroughs in London and across the country do not charge people just because they are rented.
- EPC bands
- All of them
- This is taking too long. If a landlord has not committed any offence, if the tenant (s) have not put in a complaint then that should be a credit to the landlord (s) & each year should be an accumulation of a percentage of discount when the next licence renewal is due. Give something back to good landlords, a concept that is foreign in your thinking, as this means not taking more money but crediting good landlords & giving money back. This could be to futuristic for you, as service & replying is not part of your working ethics, but taking more money from residents is. Very difficult to work with you.
- As stated before if private landlords meet the standard they should not be charged. Would be happy to pay for an inspection fee of £100?
- The following will be impossible to enforce cost effectively. They can be added later if evidence shows an improvement in standards - Providing occupants of the house with written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. - Ensuring that all reasonable steps are taken to prevent and deal effectively with anti-social behaviour (ASB) resulting from the conduct of occupiers of, or visitors to, the property. - Making sure the landlord and/or licensee is fit and proper. - Ensuring any repairs or maintenance are carried out quickly and by competent persons. - Regularly inspecting properties. - Various measures to deal with anti-social behaviour associated with private rented properties.

Q20 Are there any proposed selective licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why

- You are treating all landlords with the same tarnished brush as others poor landlords and risk the good ones withdrawing from PRS completely
- Two couples should be covered by selective license rather than additional.
- Other problems include: landlord unreasonably hiking up rent or intimidating renters until they leave
- Much more info should be included on to balance quite enjoyment of tenant with LL responsibilities eg what if tenant is a massive hoarder or has similar mental health issues ?
- All of them adjust another way to make money and for genuine landlords to leave the profession
- Cost! This will push up private rents
- Maybe something relating to high standards and landlords monitoring of property. Encourage landlords to keep an eye on their properties. For instance rubbish in front/back gardens is a real issue - if landlords were incentivised to tackle this by regular visits/monitoring.
- 6 MONTHLY INSPECTIONS THIS IS TOO OFTEN, ANNUAL IS APPROPRIATE
- Stop licensing
- See end comments and also above.
- Generally the conditions place a much greater administrative burden on Landlords and whilst I can see the reasoning behind some of the items - others are not fully considering all the stakeholders. I.e. Item 29. Small accommodation such as 1 bedroom flats and studio's that are well kept/ in good repair do not need 6 monthly inspections. This is an invasion of tenants privacy and unnecessary additional burden on landlords. Tenants don't want their landlord peering into their home and landlords don't want to undertake this. Yearly inspections are completely adequate. Item 32 - Banking records sufficiently cover this item. Perhaps this should be only stipulated where cash is paid. Not every landlord is a professional one, a lot are simply renting second homes and have a full time job to complete too. Having to send an email every time the rent is paid when online banking acts as completely trustworthy record is completely unnecessary.
- Fit and proper, timely repairs are difficult to guarantee in all cases.

Q21 Are there any other selective licence conditions (that are not already covered by a mandatory or proposed local licence condition) that you think should be included? If 'Yes', please state below

- Minimum energy efficiency requirements
- Leasehold' landlords should be required comply with their leasehold requirements before being allowed to sublet. This should be part of the definition of a fit and proper person.
- Poorly maintained properties
- Penalise bad landlords directly. Make them responsible for bad tenants
- yes - tenants replying to correspondence from landlords
- The council should take responsibility to inform the tenants of the rights and responsibilities of the landlord
- See comments about alternative approach which is much more likely to produce the required results. Licensing is yet another expense that private landlords have to bear due to a failure of central government to legislate effectively.
- It should be possible to quickly remove tenants who do not look after the property, cause a nuisance to neighbours or do not pay the rent.
- It's a scam. A revenue generating scheme for the council. Nothing more, nothing less.
- As a tenant in the 1960s my situation with a rogue landlord was only resolved when the council issued compulsory purchase notices on all of his properties. Is that power still available today?
- There should be no license
- Need more information about what the licensing scheme actually achieves. I suspect the worst HMOs in Waltham Forest are not licensed.
- They should be kept in line with insurance requirements.
- Licensing doesn't improve creativity editions
- You need to provide tenants with information about Mould. People are not ventilating their houses enough and in the current energy crisis they do not keep their houses warm enough therefore condensation is appearing in homes. I have had to send information out already translated into Polish to a tenant. I suggest you do this asap.
- All good landlords will be providing the information outlined as a matter of course and would be able to provide, it is unfair that good landlords get treated as bad by default
- The short term lets are not covered effectively
- The duties and responsibilities of the Council and the freeholders in supporting landlords who want to address anti-social behaviour and other problems that are not directly within the control of landlords and/or their agents. Such as garbage collection, pest control, the maintenance of common areas, security, parking, vagrancy, etc.
- you can put what ever you want, rogue landlords will always bend the rules and get away with it. I would say if the tenant is unknown to you , to use an agent to do checks on the tenants - ensure they are legally here, type of criminal convictions that. for example, may not be suitable for someone to be house in a block where there may be kids
- I think the Council should support Landlords and pay a percentage towards a property that has been trashed by a bad tenant, WF Council even penalise Landlords when the property has been made unlivable by tenants in charging Landlords council tax, many councils give help in a 3 month window, WFC give no help at all its all about the tenants only.
- I would like to see greater support for landlords when trying to evict non-paying or anti-social tenants. Let enforce high standards from both landlords and renters. I acknowledge that most renters are great, just as most landlords are too.
- Minimum standards for heating and hot water. Repairing obligations in writing with target time for completion and penalties for continuous non compliance.
- There should be an inspection done by a Chartered Surveyor and and major defects put right before letting and any minor defects within three months.
- Do the conditions protect tenants from overcrowding? But also avoid making tenants homeless if a home is overcrowded
- Despite the answers provided by the landlords the council will continue with the license just to make extra money off the landlords and making tenants worse off when costs are passed on to them. Same as with consultations on parking permits in the past. As you will carry on anyway you should not limit the license to only related people as it was clearly pointed out to you during the landlord forum that there are a lot of young people who are

Q21 Are there any other selective licence conditions (that are not already covered by a mandatory or proposed local licence condition) that you think should be included? If 'Yes', please state below

not related but want to live together and share the costs however they are not able to do so under current licence conditions.

- None of it is necessary - all covered by existing legislation.
- Garden Maintenance
- There is no mentions of tenant participation prior to a license being given. I think it is important that the tenants are given a chance to be involved in the licensing process.
- No rentals
- Remediation of damp/mould specifically as so prevalent.
- Appropriate disposal of rubbish. The HMO in our street causes a big littering problem
- A full background check should be carried out on the Applicant, and that everything from who is the Freeholder to the full Property details. As from my experience with the property above me that has been Subletted without the Freeholders written consent. Which hasn't been done by the Council when the Property Licence was given.
- I don't know whether councils can have the powers to do this but I would like to see landlords forced to improve the EPC ratings of homes and or be graded against other more rigorous criteria. For example many properties in WF have an EPC of band D but may lack double glazing, have damp walls which need repointing, have draughts from redundant chimneys or lack loft insulation. These homes need to be improved to address climate change and fuel poverty. I would like to see powers obtained and used to address this.
- Need a new approach to short term lets it's a massively unfair system causing problems in our communities
- You use the term mandatory but have no idea how to enforce it so the word mandatory should be removed and voluntarily put in its place. In its current state the licence scheme does not protect either tenet or honest landlords.
- Issues such as mold and natural lighting should be considered.
- Reduction for period of remaining term of existing licenses
- Fire ratings
- Link in with HMRC
- Keep the property safe to rent.
- Council to provide a reporting line for tenants who have a non-compliant landlord.
- See above
- Remove the license fee fully
- Under a voluntary arrangement, conditions of internal air quality, mould and energy efficiency should be included. This would incentivise landlords to enroll voluntarily to guarantee a certain level of quality for prospective tenants.
- See Q 26
- Landlords who deliberately and persistently avoid doing the right thing by their tenants should be penalised.
- Able to make payment in other ways other than by card
- Planning
- I have already explained
- Something about notice for rent rises - making clear that it can only be done once a year or similar as the AST law states. Affordability is the biggest issue for tenants - so how can the council include something around that? even if tangentially? Also retaliatory evictions - can something on that be included - it's already the law, but perhaps it should be clearer in the conditions?
- unscrupulous landlords wont even bother applying, the whole scheme is ridiculous and unfair on the good landlords
- Tenants need to take responsibility for dampness caused by not opening windows. This always crops up as an issue and is usually out of the control of the landlord but seems to land as their responsibility to resolve the issue which is not always possible without the co-operation of the tenant in opening windows to circulate air and remove large items of furniture from outside walls.
- Stronger penalties for antisocial behaviour of tenants eg noise
- Photos of the property to prove condition prior to renting.

Q21 Are there any other selective licence conditions (that are not already covered by a mandatory or proposed local licence condition) that you think should be included? If 'Yes', please state below

- Landlords that provide good value, well maintained and well insulated properties should be rewarded. Either with discounts to the licencing and HMO scheme or being on a database of accredited landlords. For too long the private rented market has been dogged with 'rogue' landlords and we have become accustomed to expect little from them and so we should be celebrating the good ones, even if that is only a few. There needs to be a culture change - renting should be considered a form of hospitality.

Q22 Do you think that the proposed additional licence conditions are sufficiently clear and understandable? If 'No', please state which conditions are not clear and why

- same as per my previous answer
- Not needed
- Previous page notes still used here
- People living as a family should be Selective License The requirement for planning for Additional Licenses is absurd
- too many obligations and responsibilities are simply being passed on to landlord.
- nothing is clear is so complicated
- Define "Fit and Proper"
- The council is only interested in enforcing there agenda by going after the landlords when the estate agents should be held accountable
- It is not clear why the council believe that this is appropriate.
- The ASB element is really unclear. Obviously no Landlord wants an ASB tenant but evicting them is difficult.
- No, no, no. How many times do I have to write that I do not understand the bullshit you have shown me several pages before. Am I supposed to memorise the whole text in order to answer these questions? This whole licensing is nothing but a scheme to get more money from the tenants, next to the council tax.
- As before
- What constitutes a hmo and what does not is not clear, particularly for smaller properties.
- it will cost to manage this new proposals
- I don't know about the additional conditions
- Deliberately vague and confusing to give the council more power to extort more money from landlords.
- The process of applying for HMO is overly onerous and should be simplified. The criteria for selective licensing is more than adequate.
- Too detailed. Complex
- 17. Checks on validity of electrical contractors - the link on the document does not work.
- 18. Fire risk assesment - there needs to be a sample template of the document that LBWF would like made avaiable for landlords to use and / or approved providers. I've had absolutely no sensible response from LBWF in achieving this. In the end option to pay a company to confirm fire safety which iam still not sure is correct. 22.Requirement to keep a record of regular checks - a template should be provided.
- Please clarify the duties and responsibilities of the Council and the freeholders in supporting landlords who want to address anti-social behaviour and other problems that are not directly within the control of landlords and/or their agents. Such as garbage collection, pest control, the maintenance of common areas, security, parking, vagrancy, etc.
- As per previous answer, not all Landlords will understand
- We have suffered multiple inspections. Constant and increased visitors to our home. There has been a only a single improvement [better fire alarms]. No other changes have felt like they improved the safety of conditions of the home.
- Verbose
- The officers do not know what is or is not too be filled in on a form they just want your money
- As above
- Depends on the application form.The last one 2020 was very ambiguous.On ringing to clarify there was nobody available to answer quieres
- The whole thing. Impenetrable. Need clear explanation of whether the criteria is household based / number if tenant based / household and number of tenant based.
- See earlier response.
- None of it is
- Additional Licence Condition do not take in account households that live as friends and family - these should be selective licences as less than 5 tenant living as a family on joint tenancies
- unclear why they are needed - there is already legislation to cover this
- the conditions are vague and open to interpretation

Q22 Do you think that the proposed additional licence conditions are sufficiently clear and understandable? If 'No', please state which conditions are not clear and why

- Haven't seen the new one yet, I'm sure it will be expensive and hard to fill out
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- Make it simply. Far too wordy.
- There should be one fee per landlord
- Please see previous response, which included to the 'additional'
- Again the KISS principal
- No information available.
- Very confusing, it's a tax grab. Abolish selective licensing now
- If I had understand then won't I have said YES to above.
- its all confusing full stop
- See previous comments.
- See remarks above
- Over complicated
- I loose the questionnaire if I click on your links to look at them
- a whole mess
- Too complex
- ?
- Not really necessary for good landlords
- It's something we don't need unless it's a HMO

Q23 Are there any proposed additional licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why?

- as before
- Planning for established use for 4 bedroom houses where people live as one household
- Fees for landlords
- All
- licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- Should be no licence at all
- Where a licenced managing agent already does this, an exemption should be granted and no proof required.
- Sole responsibility for lease holder landlords where fault might lie with freeholders and agents.
- No license
- HMOs house far too many people in property. le 2 bed flat 8 people
- No fee
- 100 % discount if property meets good standard
- The 'fit and proper' person. What is this and who decides it? Open to interpretation
- Electrical appliance testing, impractical, expensive. Electricians all say waste of time
- see previous comments
- All no licence fee we have already passed d enough
- The written statement of how to deal with maintenance issues or ASB
- All of it.
- Notifying tenants of waste disposal days - landlords are not parents! you would not expect someone to tell you this if you owned your own home. LBWF seem to want landlords to operate a nanny state. Furthermore the requirement to have 1.5m head room is inappropriate. A large loft bedroom could easily be use by a couple but under these provisions the council would prevent this - again increasing costs for tenants.
- Anything that a landlord may not have direct control of.
- Again, HMOs are the properties Councils should be penalising the most as they attract anti-social behaviour, not the Landlords who have just 1 property.
- All but safety.
- Should not have the licence at all.
- A minimum EPC
- Those relating to ASB. Please see my reply to Q20.
- All of them. Homeowners are already paying tax and council fees. There is no justification for an additional license. Renters already have recourse through estate agents and support from Citizens Advice. This is a shameles money grab and state interfeernece.
- the requirement of additional licence for joint tenancies
- Tenants must provide a condition of their status in writing and on renewals should provide a status / circumstances as well, any assumptions can then be verified in writing.
- All of them are unnecessary - there is already legislation to cover this
- Tenant Responsibilities
- More penalties for repeat ASBs.
- no fees at all , it makes rents go higher
- As above
- No rentals
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- The payment of fees on properties with tenants on housing benefit
- Minimum property standards
- Mold and natural light
- Responsibility for antisocial behaviour
- See previous answer
- Another tax revenue for Borough!

Q23 Are there any proposed additional licence conditions that you do not think should be included? If 'Yes', please indicate which condition (or conditions) should not be included and why?

- See above
- As above I do not see the need for local authority licensing
- With tenant as NHS workers, licence do not apply
- - Providing occupants of the house with written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. Too administrative / costly. - Making sure the landlord and/or licensee is fit and proper. Too costly to gather this info. - Ensuring any repairs or maintenance are carried out quickly and by competent persons. Too vague as to the length of time. - Regularly inspecting properties. Invasion of tenant's privacy.
- Keep it simple and to the point
- None
- See Q26
- Same as above
- Individual landlords whose properties are well maintained. Most boroughs in London and across the country do not charge people just because they are rented.
- I have already explained
- Same answer as Q20
- The landlord don't really get anything from the council anymore
- Property occupied by two couples should be covered by selective licence
- All of them. Stop licensing
- ASB tenant conditions shouldn't be a responsibility of the landlord

Q24 Are there any other additional licence conditions (that are not already covered by a mandatory or proposed local licence condition) that you think should be included? If 'Yes', please state below:

- Increased energy efficiency
- Poorly maintained properties
- Penalise bad landlords directly. Make them responsible for bad tenants. Cap on reasonable number of tenants per property + number of vehicles etc.
- tenants on a single tenancy should be allowed to rent together for say 3 single people
- The council should notify existing tenants if the license scheme
- See earlier comments
- Conditions that support landlords and tenants obligations. The council is in a win win scenario, landlords take all the liabilities and responsibilities for the acts, omissions of their tenants.
- No license
- A limit on how many people can live in property
- All good landlords will be providing the information outlined as a matter of course and would be able to provide, it is unfair that good landlords get treated as bad by default
- There should be a management agent in place that is responsible to make sure every property is up to code and tenants abide by their agreement. Council have no need to charge for this pointless scheme. It doesn't actually help even though they try and manipulate the data. Just have an actual letting agent employed to do the task
- All council and housing association properties too be included
- As above
- Do the conditions protect tenants from overcrowding? But also avoid making tenants homeless if a home is overcrowded
- Garden maintenance included with property maintenance
- no fees at all , it makes rents go higher
- tenants are satisfied with the property and its condition. Little documentation of tenants involvement is included in the licensing conditions.
- Bet you have covered everything and more
- No rentals
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- Council and tenants responsibility towards the licence and help/ support by council if there is a problematic tenant.
- The Council should make more attempt to return derelict properties into use to reduce the housing crisis in the borough and stop trying to squeeze landlords who are attempting to provide the Council with housing solutions
- Appropriate disposal of waste
- I would like to see landlords improve the EPC of homes or be assessed by a more rigorous standard. For example many homes in WF have an EPC band D but have damp walls, draughts, lack loft insulation or lack double glazing. This should be changed to address fuel poverty and climate change.
- Short term should be discouraged or more expensive. Locals should have more rights against these party lets.
- Minimum property standards
- cost fees should not be included.
- They are not mandatory as you have no way of knowing who rents and who the landlords are in the borough
- Council to provide reporting line for tenants to report landlords who do not comply
- With tenant as NHS workers, licence do not apply
- See Q26
- I have already explained
- as before.
- see previous answer
- The council must commit that all its properties meet the same standards

Q24 Are there any other additional licence conditions (that are not already covered by a mandatory or proposed local licence condition) that you think should be included? If 'Yes', please state below:

- Fixed penalty for failure to rectify issues within a very specific stated timeframe to avoid automatic penalty
- Once again I would mention dampness caused by tenants not allowing enough air to circulate in the building
- Photos of property condition prior to renting. Inventory report.
- Compulsory training/guidance for landlords

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- The Council has shown during the last 3 years that it is only concerned with the licensing fees which increase the Council revenues and not the licensing objectives.
- Due to cost - outrageously over priced in an already pressured market.
- First three are great - think the final objective will potentially provide undue access and influence over council officers if not counterbalanced by an equivalent private tenants forum
- The forum is a total joke, ineffective and unsupportive of landlords needs. What about including clear and measurable objectives for the council to meet.
- It's just another money-grab from people who are already following best practice. It's designed to make the council look good, make more money but not improve things at all.
- Welcome Forest council, just making big money from the landlords.
- The wards are charged the same amount but issues are concentrated in certain wards. Some areas have very minimal asb for example
- Landlords do not need forum meetings and newsletters reduce this "engagement" activity and focus on rogue landlords rather than those who are compliant with the laws already. Support landlords in dealing with anti social tenants.
- Should charge
- I agree with the scheme but not with the fees proposed. The implications of increasing the fees will have an impact on the tenants in the end.
- The Council has already tools to tackle such problems without requiring such Schemes. I would only support the HMO scheme alone.
- You are going in the right direction and I'm very pleased you are taking action. But go further!
- I have worked in local hospitals and heard multiple times how bad council property are maintained with all of the problems the council think having a licence will improve. They need to get their own house in order and not assume private landlords are out to exploit and rip of tenants. Already existing laws and regs no need for council to add more and make money from it
- how does paying a licence fee improve conditions for the tenant
- I think the scheme is daylight robbery and is discriminatory against single sharers who would be happy to rent rooms that are too small under current regulations. It's up to the tenant to decide what room is too small not the council or indeed the landlord. We as landlords can't suddenly make houses that are over 100 years old bigger or anymore compliant with EPC above a C grade it's just not possible or financially viable. LANDLORDS have become a soft touch for the government and councils. Direct taxation and stealth taxes which licences are- are killing us and the tenants. WE ARE STRUGGLING TOO!! - and that struggle gets handed on to the tenants - the very people the council want to protect MORE than landlords - who are generally decent people too!!
- All
- council is trying to introduce too many controls. as a free and democratic country - people should / can be able to move if they are not happy with property. not the government trying to over-regulate the market.
- Licencing does not achieve anything apart from extorting money from tenants
- It just seems to be another ploy to punish landlords
- All of them. There is zero transparency in how the scheme has helped tenants or landlords or where/how the money has been spent.
- Council implemented fees for private rented landlords do not correlate to better housing
- Waste of time and money. Use the money to fight crime in Waltham Forest which impact us more
- Its a scam. This is a revenue generating scheme for the council. Nothing more nothing less. The tenant has a contract with the landlord, not the council.
- I am unaware of a specific problem relating to this. I have seen no evidence of it. Is this a solution in search of a problem? It may exist, I just am unaware of it.
- There are better ways than to increase the cost to landlords and tenants alike through this mad bureaucracy

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- Health and safety inspectors powers are sufficient to ensure property living standards.....licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- There is no evidence that this scheme has made a positive impact on those tenants that have bad landlords. All this scheme does is raise money for the council.
- Because I currently employ a licenced managing agent to achieve your outcomes
- Licencing does not necessarily improve conditions to tenant and tends to be passed back to the tenant through higher rent
- The cost is far too high!!!
- Over-regulation by the council is costly both to landlords and thus passed on to tenants and reaps nil benefit in the borough
- Council are useless, guise for them to get revenue. They concentrate on getting social housing in order
- tenants should be charged
- Thw whole scheme seems to just be a tool for raising money, Housing conditions in WF have got worse so the scheme isn't working.
- Because it is a blatant lie. We are going to improve available properties by stealing any profit and disincentivising landlords from doing more than the bare minimum.
- You are not engaging with landlords in a positive way. There is no dialogue, just increased fees. Landlords of one property are being treated the same as those with multiple which is extremely unfair.
- It makes no difference to have a license
- its started off by talking about anti social behaviour and fly tipping etc. This is caused by he tenants who live in the area, you cannot expect landlords to enforce these schemes if tenants are not acting as good tenants, the tenants should be made liable. All this scheme is designed to do is punish all the landlords for the mistakes of the minority of bad landlords and most of the bad tenants, the landlord gets fined if the property is over crowded whilst he only rented the property to a couple how is that the landlords fault? whee is the consequence for the tenant?
- All of them. I think they are detrimental to the PRS and tenants. Taking more money from landlords lowers the standard of housing as they have less money for improvement and additionally loads us as tenants with the additional cost.
- This proposed scheme main objectives are to increase the income of the council. It doesn't help in any way of improving the conditions of private rental property. The current government regulations are enough to ensure that private rental properties are save and healthy to live in. Any extra fees will reduce the number of private landlords which will creat a shortage of available properties for rent. This gap is going to increase the pressure on the council to accommodate homeless people in expensive hotels or bed and breakfast. The council will loose more financially than gaining by collecting this hidden tax.
- The published supposed benefit to landlords is a very weak argument for landlords who already proactively manage their properties so there is no benefit to those landlords from the first objective. I fail to see why licensing is needed for the engagement objective
- Cost of participation if property meets good standard
- To date, whilst this fee/tax has been collected, no real checks on the condition of properties has been made (except to request a copy of gas safety cert). Therefore the 'fee' has simply been an additional tax on landlirds
- Landlords with unfit properties should be penalised not good landlords with good properties
- It does not achieve anything, except it raises the rent. This might lead to a situation that problematic tenants cannot afford it any longer.
- The above is lip service none of the money is used to improve conditions
- The cost will go up and tenants will pay. which is not fair.
- Enough with selective licensing. Respond ho real and actual complaints more effectively
- All

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- Good properties attract good tenants. I am not sure it assists matters by charging landlords excessive fees to licence the property.
- please see my previous response regarding t
- Fees too high
- The objectives are a lie. It's about generating revenue. Be honest!
- The question is absurd. No one disagrees with the objectives. The issue is that the increased costs works against the objectives!
- I have 9 rental properties. They are all in very good condition, with or without a licence. This scheme will NOT improve the quality of my properties, but in fact money I would normally use for maintenance will be used to pay for the licence. Secondly, why are private tenants the only people capable of ASB? And you yourself have said, even with licensing, landlords cannot take any necessary action anyway, so expecting licensing of landlords to reduce ASB is pure poppycock! Finally, your newsletters and forum, whilst being locally informative, are not substantive enough for a landlord. However there are many FREE forums and newsletters out there that do keep me well informed of the changing landscape.
- I believe there are more cost efficient and effective ways for this to be achieved.
- The objectives are fine, but the solution is to put the burden on all landlords, even the good ones, which is inequitable.
- You need to have two licenses 1. For rented houses for tenants up to 4 households. 2. HMO's for 5 and above. Current system is ineffective and inefficient.
- It's fraud and makes me so upset that councils have been allowed to do this.
- The high fees.
- reasons already given. Penalises those who follow the rules
- The scheme is a continued additional tax on good landlords - why should we continue to pay for the few who are not good landlords. Any costs are passed on to the tenants so that doesn't help either.
- For those who have already paid thr pervious license fees, there should be no further charge, only to new landlords
- The clasification of HMOs is ridiculous and can be severely detrimental. What LBWF defines as a HMO is beyond belief. There are often very legitimate reasons for a tenant to help out a desperate homeless friend by allowing him to sub-rent a room for a short period. Your definition is heartless to such people and jeopardises the landlord's position with LBWF.
- Its just a money grabbing opportunity for the councils and it forces the landlords to increase the rents because of these unnecessary costs and the poor tenants end up paying for this.
- the objectives are reasonable but the approach is wrong.
- Use a different scheme to achieve council objectives
- While the objectives themselves are uncontroversial, the scheme imposes work and cost on landlords which is inappropriate to the likely impact of the scheme compared with the burden placed on landlords and tenants. It unfairly penalises landlords wishing to let for less than five years.
- It does not address short term lets which are affecting a lot of residents.
- These objectives happened prior to licence introduction.
- But yet again, no wording of 'Helping Landlords with rogue tenants
- This scheme is all about making money for the council. If the council really wishes to meet the above objectives, then licensing should be done for free providing all conditions can be met. Having fees associated takes away from the very objectives set out.
- If everyone used a letting agent there would be no issues. They would ensure all things are done correctly.
- The scheme is only too make money for the council not too improve the housing stock
- HMO yes need licensing don't think flats and houses renting t single and families, council needs to concentrate on building more affordable housing , hospitals and schools
- The Council has enough to do and is going to go bust soon. Stop spending money on these unnecessary things.

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- You're concerned about the wrong things.
- Improving Property Conditions and Management Standards in Single Family Dwellings and HMOs:
 - Discrimination concerns: Focusing on specific types of properties might raise concerns of discrimination if certain property owners or tenants are disproportionately targeted.
 - Legal boundaries: The local council's authority may be limited to enforcing existing laws and regulations. Introducing subjective standards for property conditions and management might exceed their legal mandate.
- Reducing Anti-Social Behavior (ASB):
 - Overreach of authority: While local councils play a role in maintaining public order, addressing anti-social behavior may fall more under the jurisdiction of law enforcement agencies. Setting such a goal may exceed the council's powers and mandate.
- Engaging with Landlords via Landlord Forum Meetings and E-newsletters:
 - Preferential treatment concerns: Selectively engaging with landlords through forums and newsletters might raise concerns about preferential treatment. It's important for the local council to ensure equal representation and access to information for all stakeholders.
 - Limited impact: While engaging with landlords is important, making it an explicit objective might not be appropriate as it doesn't directly align with the council's primary responsibilities, such as providing public services and infrastructure.
- Given the current cost of living and the need for tenants to find affordable housing, additional costs on landlords from the council in paying for landlord licences (which are ultimately passed onto tenants in increased rent) is counterproductive.
- I do not believe it is the role of landlords to reduce ASB, that should be a matter for the Council, police and justice system to take up with the individuals concerned. As I mentioned in previous answers, landlords have very limited leverage over the behaviour of tenants except for the draconian threat of eviction. The Council appears to be shirking its own responsibilities in this area.
- Should be something in there about waste management and community belonging.
- It's double standards as private landlords expected to maintain properties to certain levels but council and housing association I have seen are in much worse conditions and more people living in and if that was a private landlord you would giving them lots of hassle.
- What evidence do you have that renters cause anti social behaviour? This is classist and ignorant. I live on a street full of renters and people leave their bikes locked up outside their house, which doesn't happen anywhere else.
- Doesn't work. Dodgy landlords will not register. Good landlords will just have more costs to pass on. If you want to deal with asb allow tenants to be removed easier. To improve conditions make complaints and reporting simpler for the tenants.
- Additional Licences should be scrapped and turned into Selective licences
- Waste of money
- I do not think it improves anything for the tenants. It only adds additional costs which is then passed onto them. As pointed out to you in the Landlords Forum inspectors are inconsistent with their decisions which seems ridiculous and clearly defeats the purpose of the entire scheme. There is nothing to benefit a landlord in this scheme. Good landlords are made to cover costs for inspecting bad landlords.
- all of them. Current national legislation covers all the objectives - they need enforcement and that shouldn't be paid for by good landlords.
- Please don't waste time 'engaging' with landlords and providing an E-newsletter. This is just job creation. Just publish info on the relevant pages on the WF website or email license holders if there is something urgent to relay.
- I am not sure just what counts as "ASB". If the activities of tenants are a nuisance to their neighbours then landlords should have a duty to deal with them, but if it is just that the tenants are criminals (for instance, if they take illegal substances) but they pay the rent and do not affect the neighbours then even criminals have to live somewhere. Also, the Government is about to disallow conditions that tenants do not keep pets and if a tenant is allowed to keep a dog it will be very difficult for the landlord to stop the dog from annoying the neighbours.

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- you need to build more houses , not create more regulations , send all your people working in your offices for training and then on building sites to build new houses. Producing paper and charging fees , makes housing more expensive and worse.
- More police
- The cost of the licensing is far too high and impacts the tenants as they are eventually passed on by the landlord, who is not renting for charity. The licensing costs defeat these objectives which are mainly idealistic. Hence, not good value for money.
- This is just an additional cost which is passed on to tenants. Landlords would have more funds to maintain their properties without the license fee
- I think it's really important that new regulations don't make it impossible for landlords to continue with HMOs. If the new licences are overly complicated or prohibitive this will have knock-on effect for single people who need to rent somewhere to live. I love Leytonstone but I fear the new regulations could mean the only people who will be able to live here are families or people who can afford to buy their own home. What makes an area great is a mix of people and that includes single people and people of all ages, not just families.
- No rentals
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- Licencing will not help with these objectives
- It's an ineffective stealth tax scheme. This is not helping tenants or landlords.
- It's made no difference to me or my behaviour as a landlord. Any such scheme should be targeted to properties, landlords and tenants where issues exist
- No benefit to the landlord. Council is happy to charge £100's in terms of fees but physically is not doing anything to help the small landlords to sort their properties out. There should be support from the government funds to help small landlords to provide a quality housing for local people
- The Council has a responsibility to uphold housing standards. It should spend equal or more time on providing providing housing solutions instead of trying to squeeze those who are
- Remove separate licencing conditions, landlords should (and are) obliged to meet safety standards such as gas safety certificate, electrical safety certificate etc. landlord licences not required in addition to this.
- How do they know how property is kept when they don't visit properties unless a complaint is made
- None of these objectives actually reduce ASB. It only improves the property conditions.
- Paying fees on housing benefit tenants
- All of it
- I don't believe that a license improves the situation for tenants as there are already mechanisms to monitor poor housing conditions. Also, it penalises good landlords and also makes rents higher to the tenants as the landlord would pass this cost down to the tenants.
- As mentioned previously in the questionnaire, I believe that this scheme should not be used to hold landlords responsible for asb by tenants.
- I tend to agree with the objectives btut I do not agree that they are necessarily achievable through charging a licence fee. And what happens to the landlords who simply don't sign up?
- You say this is an objective "Improve property conditions and management standards in single family dwellings" how can you justify this when you don't include minimum property standards, and have not inspected the property for any of the 3 licenses I have held
- But those who comply should not be the ones who pays for those who do not.
- Engagement is good but we've already been doing that and things have not improved. Enforcement needs to be emphasized
- There is no evidence to suggest this.
- Because the feedback that I have seen doesn't show that you achieve very much. Maybe if you showed where all this money, and it is millions, goes ???
- ALLOF THEM

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- Landlords have no power to reduce ASB ! Neither from their tenants or any neighbours. I see no way in which the scheme reduces ASB whatsoever
- I rent out ONE property, because I had friends who were homeless and invested my life savings to help them. I rent to them at less than half of the economic rent for the property. I keep the property in excellent condition. This licensing scheme will have no impact on the service I give to my occupants. It is nothing but a means of generating revenue for the council. I shall probably consider selling the property now.
- All of the objectives because it fails to factor in additional costs renters will face as a results
- Don't think the scheme will help
- HMO for landlord living in same house.
- I think I've made my comments clear already but to summarise: WF Council tenants are not regulated ok the same way - I've got some very disrespectful council tenant neighbours who do not care for their properties and the council do very little about it. This is a tax raised due to shoddy landlords and should not therefore implicate decent honest landlords. I've been forced to pay this - therefore my rent goes up to accommodate costs which is directed back to hell the tenants. All a scam that is not regulated! No one has ever inspected my property to know whether I am actually providing decent housing. I imagine this is the case for landlords who also don't provide decent housing. So therefore why create a tax???
- No need to have licensing it's not adding value to anyone life except landlord are penalised
- council are making it hard for landlords which means tenants cant find rental palces as landlords are leaving the market and this is making a burden on the local council
- As already stated this will all be covered by Renters Reform that is going through parliament
- But I have seen no evidence of the council making any inroads in the objectives over the last ten years. I don't see that putting up the licensing fees will make any differ3nce to that
- Inspectors do not control shabby properties
- It's a revenue raiser only - cost neutral is nonsense 22,000 standard licences @ £500 each is £22million, not counting the HMO licences. Between the council and the current (immoral) tax rules on private landlords there will soon be a lack of properties for rent.
- I guess it makes sense on a wider scale, but as professional, reasonable and thoughtful landlords, we make sure that the space we rent out is decorated to a high standard, safe and comfortable. We only have one property.
- The fee is far too high for the service provided. This will encourage landlords to increase already high rents and pass the cost on to the tenants
- It is just a scam from the council
- I completely agree that families in rented properties should live in decent accommodation. The licensing scheme treats all landlords as bad landlords. I have provided decent housing and kept rent increases to a minimum. As houses become vacant I'm considering selling up.
- There should be no licence scheme full stop
- Just another council revenue collection
- The landlord needs to provide and prove they are proving housing of a minimum standard. We are happy to do this by submitting the appropriate documents. A small admin fee of say £50 or £100 should nhe sufficient
- This is too much this is like paying another council tax extortionate fees council is run very in efficiently Costs are going to be passed on to tenants with higher rents the council is fleecing everyone tenants with higher rents what a rubbish council my friends live in Croydon they took selective licence off much cheaper place to live
- Increase in lincensing fees
- Consider the scheme a revenue earner with no clear results. The positive outcome would be minimal and result in higher rents for tenants
- The objectives are not answered with the proposals. Why not have a bottom up approach instead, the ability for tenants to have recourse council enforcement, should their landlord not be providing adequate quality, rather than pushing many small occupancy houseshares

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

into HMO licensing, which may mean the landlord has to sell the property and there is less and less provision and lower and lower quality.

- Stop charging fees
- I have answered this question in the fee additional answers box. Please refer. Another point is that there is duplication of work. Before letting a property via a letting agent the documentation you require for the licensing scheme is already required by the letting agent. Why are you duplicating the work? The council needs to work in partnership with the letting agents within the borough. The letting agents already have the documents required for the licensing scheme. For example gas safety certificate, tenancy agreements, EPC etc. Resources should be used to target properties that don't have letting agents and require inspections and the need for a licensing scheme.
- The authority is trying to force the private sector to conform to its rules, by way of charging. We have provided flats and houses in the borough for more than 50 years with little help from the council , but we still have to pay the fee's in full .
- I believe scheme does not work and is ineffective. Current law and regulations are sufficient.
- Particularly for single family dwellings, if the property is sub-standard, there is existing legislation that should be enforced, to deal with this. in addition, tenants always have the option to move from sub-standard accommodation into better accommodation. Landlords are incentivised to look after their tenants due to the cost of finding replacement tenants, plus the risk of not knowing these new tenants.
- You do not engage, are confrontational and unhelpful
- This is a leading question. Although the objectives per se are laudable, the questionnaire leans strongly towards favouring the proposals, whilst discounting all alternatives.
- use common sense
- Private Rented Landlords are not equip to deal with anti social behaviour. This is the council's role, not theirs.
- There are rogue landlords and rogue tenants. Implementing this schemes probably helps catch those, but at the expense of the 95% of good professional landlords. The whole scheme is a waste of time and money. And only drives up rents.
- I have stated alternatives- Im a landlord with a single property with all the fees being imposed - the increase in interest rates - the hassle involved - I spent over ten k on my flat last year replaced everything - due yo tenants leaving a complete mess - where's the protection for landlords -
- The licensing has made zero difference to to conditions and standards in my case, all it has done is added costs which I pass on to tenants. You are making rental properties less affordable.
- I would like to see evidence that the council is meeting its objectives as I suspect this is bureaucracy which has probably no or very little effect
- Individual landlords whose properties are well maintained. Most boroughs in London and across the country do not charge people just because they are rented.
- Because it's really about making money for the council
- I have NEVER been to a landlord meeting because of working commitments, I have asked lots of questions however, like everything in dealing with the council, service & replying are not high on your workforce, yet creating schemes to make more money is priority number one. As I drive over pot holes, ask for receipts for my ridiculous payments both parking & landlord schemes & after all these years still nothing, but if I am as slow as you in payment as you are in either of the above, what happens to me, is totally different to what does not happen to you.
- the borough has the highest council tax and the licensing cost is being put into the rent and the tenants are having to pay for everything including the annual rent increases which landlords do to cover the costs of maintaining the properties
- i think the definition of "single family dwelling" is problematic - and doesn't reflect how people live today into their 30s and 40s in shared housing.

Q25 Do you agree or disagree with the proposed scheme objectives? If you have answered 'Tend to disagree' or 'Strongly disagree', which proposed scheme objectives do you disagree with and why?

- We shouldn't have to pay for the shortcomings of other Landlords or council improvements, we already pay via Council Tax and Income Tax.
- It seems like a money-making venture. The cost per property is too high.
- rubbish landlords simply wont get a licence. good landlords are just paying fees to support the council dealing with the rubbish ones. i know somebody who got caught not having a licence for 7 years and he wasnt even made to backdate the fees, so most landlords wont bother and will just sign up if they get caught, which means the rest of us good landlords are funding this. the whole thing is unfair and should be scrapped
- The have not once got in contact to ask me as a landlord my opinion other than a news letter ,the service that landlords get within the borough in my opinion is 0% help ,it's hard enough trying to get to the property's to maintain them with all the parking issues,we should be getting permits for parking at no cost
- Its becoming too onerous for good landlord who may completely withdraw form the PRS sector
- Licencing does not have any effect on ASB, landlords are powerless to do deal with that. HMO are covered by different licencing shema, so the proposed scheme has no effect on that either. Landlords can be engaged without the need of licencing, so none of the above objectives will be achieved.
- Too much regulation forcing good LL out
- You are penalising good landlords with this measure and adding costs.
- I think it will be a waste of money
- I have a three bedroom house, and i do not see why a landlord should be penalised to let to three professionals instead of a family unit. Why are three female professionals being discriminated to live in the borough. They would actually 'behave' better than a three year old that 'draws' on my walls. The council should give the landlord the choice who lives in their house, rather than which is the cheapest licence to have. three single adults have more money to spend in the borough in coffee shops, supermarkets , pubs, than a family budget.
- I don't think a property licensing schemes helps to achieve any of the objectives listed
- There will be a fee for the proposed national licensing scheme! We should NOT have to pay twice.
- Expensive & excessive. Not beneficial to anyone but the council. No impact will be achieved
- There is the need to tackle rogue landlords but the good ones don't need any of this
- Stop licensing
- I don't agree with the high charges associated with the scheme which ultimately simply increases rents for tenants and doesn't seem to create many tangible benefits
- Detailed at the end.
- See q16 and earlier please
- The scheme is fundamentally flawed. You are driving responsible private landlords out of the market, the supply of properties is falling and rents are going up and up. Wake up!
- I agree with the objective, but the way it is being done is backwards. You need to be finding the rogue landlords, not charging the good landlords.
- Most landlords are good landlords and maintain good standards regardless. The license fee appears to just be an additional income stream for the council and not impacting any improvements.
- The licencing process only penalises good landlords with extra cost and admin. This is just a money raising exercise for the council.
- Privately Rented Licensing Scheme should be abolished in the borough.
- Not many new rentals coming into the market, shortage of properties driving up cost of rentals
- Most of the UK doesn't have or need these schemes. Waltham Forest wants the money.

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- No.
- Most of these flats rented out are controlled by freeholders, who are responsible for the overall repair and maintenance of properties, so they should be accountable for any repair concerns of tenants too. The Council should enforce freeholders' to do the repair works too. In the current system, if the roof leaks, for example, it is the responsibility of the freeholder, but the Council assumes that leaseholders are responsible and expect leaseholders to carry out the repairs or actions against them e.g. revocation of licence, improvement notices, fines etc. Leaseholders are in a way stuck between tenants, freeholders and the Council and they may face legal action from all these parties e.g. tenants applying for RRO if there is a repair matter, the Council issuing a fine, freeholder bringing breach of covenant claim (if leaseholders carry out any repairs which were neglected by freeholders and if freeholders do not respond to requests for repairs for months) etc. For all these reasons, when licence applications are made, the Council should make freeholders aware of their obligations and that they might face similar fines or legal action by the Council if they fail to carry out essential repairs they are responsible for too.
- The Council should abandon the private landlord licensing scheme and let the market resolve the tenancy / rental property issues. Over-regulating and interference in the letting sector by a public body will result in a shortage of housing.
- Tenants need to be anonymous when reporting in danger of just being given notices landlords hold pawed unfair dynamic
- If selecting licensing is extended beyond 2025, then it needs to INCLUDE local authority and housing association housing as those two areas have very poor housing conditions. A standard of housing applied across the board, no matter who the landlord is.
- Tenants in rental accommodation should be supported to understand their rights and how they can be supported without risking their own eviction.
- Too expensive. £700 was bad enough.
- As a private tenant who has a landlord who currently tries to turn our family home into a hmo I believe that more needs to be done for middle income families who can't afford the extortionate private rents at the moment but aren't eligible for social housing either. Over the last 15 years I lived in several properties and tenants are tbh too afraid to call the council on bad landlords as they fear eviction Much need to be done to improve the UKs private rented sector
- There should be total transparency on how the fees are used by the council and clearly established targets for administering life des and dealing with rogue landlords and tenants. The scheme should aim to be supportive of private landlords. Right now, it is nothing more than an administrative costly burden with no benefit for private landlords. By all means, go ahead with your increased fees and additional requirements and you'll only end up with less available properties on the market.
- Enforce them. After moving next door to a rented property that has constant loud parties we have found that after using the noise complaint portal in the council website, they receive a warning letter about the complaint but nothing has been done to enforce the landlord license of dragging with asb. We are actually moving out of the borough as the stress of living next door to rented properties with asb issues is now too much to deal with.
- I think it's a really important thing to have in place to protect tenants living in properties in WF as well as their neighbours
- The license should be abolished. The Council has found a way to make money from landowners who already spend a lot of money on mortgages, EPC improvements, agents, tenant deposits, maintenance. The authorities on top of this demands money because they invented the licenses how unfair is that.
- As a landlord I do not think there has been any Ben foot for my tenants at all. It's a single family property. The certificates I gave to the council, gas safety etc are legal requirements I already had in place. After the licence starts they are never rechecked. There's no inspection, my flat is in a great condition but it's not checked. There's no rent checked. I charge a fair rent, but again this is never checked. They are still reliant on me being a good landlord in the same way. The only co tact I've ever had it to send certificates and pay. In chingford green ward flats and roads are generally kept well. I'd be interested to know how

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

much intervention the council has made in this ward compared to others. I haven't ever heard of any, as a landlord or a tenant during the scheme

- The price is too much
- I see them only as a way for the council to get easy income from compliant and law abiding landlords rather than focusing on rogue landlords. The fees proposed are astronomical at a time when landlords are leaving the sector due to increased regulation, taxes and mortgage increase rises. Crazy to aim for EPC B - given that most of the borough is Victorian/Edwardian property. How about doubling the fee for landlords who have poor property standards, cannot evidence safety records (e.g. gas) or those who have antisocial tenants and have made no attempt to deal with it - or for landlords who have unresolved legitimate complaints from tenants?
- Shouldn't be charging
- Discrimination is a huge issue, the law will soon be changing on this. You need to get one step ahead and also protect your residents.
- In my experience those breaking the rule consistently seem to be allowed to continue as landlords despite clear evidence that they are not fit to do so. (As long as they pay a fine) If standards are not enforced strictly there is a danger that this will be seen as a revenue building exercise rather than to improve living standards for the people of WF.
- The objectives can be met by the Local Authority without having to implement the scheme. However I would implement the HMO scheme alone but not the other one.
- Come down hard on Slum landlords. They ruin local areas, and cause misery for their tenants while. They get rich
- Go for it! Our lives were made a misery during lockdown due to an HMO that became a drug house on our street. And we felt powerless to do anything about it. It should have been easy to resolve - the landlord gets their licence revoked and is forced to sell the asset. More broadly speaking, taxing buy-to-let out of existence would do everyone a favour. So don't be shy.
- I can not say strongly enough how much I disagree with scheme.. Council are ruining Waltham Forest. I will be leaving the borough as so unpleasant to live now with restrictions on movement by car, rental of property and the number of new housing going up by developers is ridiculous. I feel the council do not listen to people living here. Just plough on with schemes already decided on.
- The council does not listen to views (which they invite) of 'interested parties' at the licence application stage, I know because I was one of them in 2020. The council does not respond appropriately to online reports of flytipping, littering, dirty front gardens and low level anti social complaints, even when the issue is with the same address all the time. I've had numerous reports that I've taken the time to do left unresolved. Landlords are not held responsible for their tenants poor behaviour and can be completely and totally absent, thereby not monitoring or looking after their properties. All of this negatively impacts on neighbouring residents who are left feeling frustrated and ignored when raising their issues/concerns.
- i am against the scheme, always have been.or at least i'm against the fee. standards should be higher anyway, without paying a fee. it makes it so hard for some landlords to even make a profit....no need to charge those who play by the ru i know someone who never bothered getting a licence... and when he was caught, he was able to just buy the licence, no back fees, no fine, nothing. that makes a mockery of decent landlords like myself who have paid from the start. if you insist on charging a fee, at least only charge those with more than 1 property.... those landlords probably arent doing it as a business, and the fee can be crippling
- Lovely intention but likely to be useless in actually making landlords treat housing as people's homes rather than as profit mechanisms. Until we have something g between asking the LL and going to court, protection from s21 eviction, and uncapped rent rises, and as long as tenants pay council tax and utilities (no incentive for LLs to have properly insulated etc houses) there are serious limits on the efficacy of any scheme - they are all reactive and reliant on goodwill of LLs with no actual enforcement power
- none
- Enforce them

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Scrape them for decent compliant landlords!! Get hold of the bad landlords !!! Allow multiple friends to rent on a single tenancy - stop discriminating against these kinds of households- I turn away at least 80-90 applicants each time I rent a property... it's a nightmare!! and my property ends up having needless void periods. The council know this problem is huge and there is no mention of it in this questionnaire AT ALL. It is very cleverly constructed to avoid landlords saying what they really want to say!!! It's a massive rip off!!!!
- I only found out about the scheme by accidentalso discovered that what is listed by the landlord as being the case I've double glazing throughout the property is not the case . This affects the energy efficiency.thevproperty has seldom being inspected . I am not sure how all these conditions are checked if no inspection of the property is made by the council
- Having a licensing scheme will allow the council to regulate the landlords and properties ensuring health and safety for the tenants and a minimum standard of a decent home. it will also allow the council to hold landlords accountable for the standard of their properties
- See earlier comments. This is the wrong approach if we want to achieve the shared objective of reducing anti-social behaviour and improving the housing stock as it alienates good landlords and does stop the poor practices of bad landlords.
- EPC B is a kick in the teeth rather than C - B would require properties to spend excess money with no valuable return for any LL, and will turn people away from paying for licencing with the lift in costs in my opinion, as well as the squeeze in general on property profits. I believe selective licencing is not needed, but additional should be done better and more housing visits with the funding as paper doesn't tell a full picture. Thanks
- Additional licensing should be scrapped as people live in a 3 or 4 properties as one household and there is already a shortage of housing Requirements for planning should be scrapped
- It doesn't work. Good landlords will do what they need to do without these excessive changes and bureaucracy. The focus should be on rogue landlords
- Council had rented property scheme runs more than 10 years now this must be stoped now and just do there duty as normal
- As mentioned, in three years no one from the council has ever come to inspect the property. Numerous times i had to chase up the application of the license. In my view, this license is not fit for purpose if you do not go out and inspect the properties. As such I do not understand what this fee is paying for?
- It should be scraped!!!
- I honestly do not know what we get for the licensing fee other than confirmation of the licence and perhaps a visitor to measure rooms if that. We have been landlords for over 20 years with properties in excellent condition, yet we now have to pay for a license because other landlords are rogue. Just this year with no warning we have been sent another bill of £600 to pay in six months with no warning on top of £90 per month yet the communal stairs are filthy rubbish over flowing and then you further insult us by a licensing fee Landlords are penalised by the tax system, service charges and now councils. There is a place for privately rented accommodation as the councils do not have the means to provide accommodation for everyone. Carry on with this nonsense and landlords will simply walk away it's not worth the investment of time money and effort.
- The council should stop using the scheme as a hidden tax. It does nothing to help tenants - but does place pressure on landlords to recover their outlay via higher rents.
- There is zero transparency in how the scheme has helped tenants or landlords or where/how the money has been spent. At this stage it seems like another stealth tax that impacts tenants, the poorest the most as landlords simply pass on the costs to the tenant.
- I feel as landlords we keep our properties in good condition but its the tenants that cause problems and they are the ones that everyone listens to also the properties tht we have are very near the council owned ones and they aree generally surrounded with littered areas overflowing bins and not well maintained the council should be watched over to ensure they comply with decent exterior management
- I agree with the declared aims but the fees are too onerous particularly in the current economic climate where many landlords are selling up because they cannot afford to run their properties. As always the rogue landlords get around the rules as much as they can

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

and the council is never able to catch up with them so the honest ones get the brunt of the expense and hassle.

- Ensure that renewals of licences do not require starting from scratch. Reduce the amount of paperwork required. The licensing is very onerous especially for landlords with only one property, as a result I am seriously considering quitting as a landlord and removing my property from the letting market.
- I am a responsible private landlord of 1 property. I have always kept my property well and had a good relationship with my tenants. The scheme simply imposes considerable extra costs on me personally with no benefit to me, my tenant, or the property. I object strongly to being asked to pay to subsidise bad landlords, simply because I am a landlord myself. ALL residents of the Borough should contribute to these costs, via the council tax, not just those who happen to be landlords.
- This is a shameful scam. A revenue generating scheme for the council. Nothing more nothing less. You are dictating how my investment should be run with no contract between you, me and the tenant. A shameful exercise.
- No
- Why "Selective" ? Where is the Value for Money element of this? What is the council spending this money on and what is the breakdown? Is it paying for more policing (ring fenced) - show the evidence. Is it paying for greater youth services (ring fenced) - show the evidence. etc, etc... What support are landlords being given? In my experience, none. I have asked for help. No one helps. Why is it so one sided? If we are provide the "important role" that we do and you concede, why don't you want to work with landlords rather than just castigate us? Big problems stem from little ones. Help us to help you.
- No, I believe these consultations just make the council look good but the results are rarely incorporated in the scheme. At the end, whatever the council wants good or bad for business will proceed nonetheless
- Health and safety inspectors powers are sufficient to ensure property living standards.....licensing is an unfair burden on pensioners who have just one property that they rely on to make the state pension livable.....licensing of Landlords with multiple properties would be more fair
- Disgusting that a licence is even required. You have to pay a fee for nothing at all. Also where is the protection for the landlord against terrible tenants that run up debt at the property, trash it and do not pay rent leaving the landlord out of pocket!
- If this scheme is reducing anti social behaviour and littering / dumping of rubbish, then I would like to see a demonstrated evidence base of its claimed outcomes. Should this be the case I would expect an equivalent reduction in council tax for the provision of policing, street cleaning and maintenance.
- I think process should be made far simpler as landlords we have so much deal with and it is becoming much harder to run
- This way to regulate only has the effect of driving out landlords and consequently, driving up rent
- The proposed fees are too high and will inevitably lead to rent increases.
- Licencing only results in higher rental payments to the tenant as these fees are passed down
- The licensing fee is far too high. I think it should be half the fee proposed. The council are making more than £11,000, 000 from this scheme already, which I think is outrageous!!! It will be double that with the increase in fees.
- All of these costs are passed on to the tenants and I don't think that's recognised
- Since the license scheme has come in force it has caused the rents to increase in some cases by 100% This scheme has been used as an income product by the council, The original schemes when trailed by newham council was set at £250 for 5 years since then the greedy councils have started to triple the fees to line there pockets to subsidise other departments The quality of properties has remained the same but the rents have increased significantly if this scheme stays in force then the council will make it impossible for the average renter to be able to afford a property in the borough. With increased rents all the council is doing driving more cramped condition for those who can not afford the rents in return making the condition even more unbearable. The desire to produce income

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

by the council has out weighted the service they are delivering. One needs to bear in mind how can we expect a typical family to afford £3-4K pcm rent for a 3 bed house I have been doing g this for many years and never come across a family that can afford a £3-4K pcm rent All the tenants that do that these houses seem to sublet a room to subsidise there rent illegally By imposing license all you have done is to increase the problem

- please be mindful that not all landlords are making vast sums of money from their property. We just want to make sue the tenants are happy and safe and are happy to pay in to the system to make it better for everyone. But if the costs are too high it will be yet another incentive to sell, potentially decreasing the number of rental properties available in the area. Please offer an annual payment option or a refund on unused years. Thanks
- I believe there are issues which need to be tackled, but you are essentially taxing good landlords to deal with the bad ones. Laws are already in place to manage these and should be used more extensively and effectively. Ultimately the tenant pays as landlords will more than likely pass on the cost. I don't understand how this scheme will root out illegal landlords who simply won't register for the scheme. I feel this is a tax to raise funds for the council who, according to your own data, have created less than a thousand additional Council households in the past decade and are highly dependent on private landlords who are being penalised for providing a service the council cannot / will not. If you continue with this scheme then inspections must happen before a licence is given. Else this is all rather pointless. What you'll do with all the tenants who cannot be housed in the homes of poor quality, I don't know... but there will need to be a transition phase to actually bring properties up to standard which will only put further pressure on the housing supply. An unenviable task.
- Over-regulation by the council is costly both to landlords and thus passed on to tenants and reaps nil benefit in the borough
- License should be abolished
- tenants should be charged
- This is a barely disguised tax grab that has no interest in improving conditions, just increasing costs for landlords, and consequently increased rents for the poorest in our society. Disgraceful.
- Last time I applied, I only received the license when I chased it up months after making the payment (and then got it almost immediately). This did not make me feel that the scheme was being run in a very professional way; if I am paying out quite a lot of money then I'd like to think that all aspects of it are being properly managed. It can feel to responsible landlords that they are being penalised for the poor behaviour of other landlords - it would be good to feel that landlords who provide good quality homes receive something positive from being in the licensing scheme other than just being allowed to rent a property. I agree that all homes need to be improved for energy efficiency (and not just rented homes) but there currently is not the skilled workforce that is needed to achieve these changes - particularly in difficult to treat older properties such as the one that I own. Cost is also a significant factor - I estimate that it would cost around £30-40,000 to raise the EPC from D to C in my property (let alone B), which would require expensive and disruptive installation of insulation to walls, floors and also new windows to replace the original single glazed sashes. I do not have this amount of money to spend upfront, and did consider selling when the government proposed making these changes compulsory by 2025. If the council wants to encourage private landlords to improve energy efficiency, then we really need a trained local workforce and also ways of spreading the cost - contrary to popular belief not all landlords are raking in bags of cash, many are ordinary people like myself who still have mortgaged properties and only make a modest income.
- The charges are additional cost on top of what landlords do for Tenants. I think this scheme should be abolished.
- Reduce fees, they're too high and do not taking into account the cost of living. All these fees are being passed onto tenants and making tenants worse off!
- There are plenty of laws to deal with criminal landlords All you are doing with these licenses is increasing the rent of your tenants you have landlords who are trying to do the right thing
- This scheme should not stop as it gives landlords a duty of care

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Bad idea most of the reasons given for the scheme are more to do with the tenants who habit the properties they dont seem to be getting penalised apart from landlords. the landlords will eventually sell up stock then there will a shortage of rental stock and in turn put the prices up the council seems to be loss of ideas and creativity in tackling issues and look to follow easy routes instead of dealing with the issues that matter
- Completely unnecessary and prohibitive. What happens when you take the little profit that a business has? They save, cut costs or go broke. Council should understand that all costs that a business incurs is calculated within the product(rent), so ultimately this lowers the standard of the PRS and increases the rents we are paying.
- I would like more factual data about how the scheme works and how it aims to meet its objectives. Over the years the scheme has been in operation I am unsure what difference it, as opposed to market changes, has made.
- Unless this is a national scheme it is unfair to landlords in the associated local aithoroities
- The fees are far to high.
- It shouldn't be extended to any new ward and actually it should be reduced gradually and appolished. The council should find more friendly methods to ensure the current government regulations regarding private rental properties are followed and applied by private landlords. There are many regulations that control private rental sector which are enough to ensure that private renters have the protection they deserve. Most private landlords have invested their life savings to purchase their properties and they will always keep it in a good condition.
- The councils benefits to landlords argument as published are weak and indeed the second is very clearly a benefit to the council not landlords. What is the experience of tenants who are just seeing the cost of the licence added to their rent.
- A target list of the worst offending landlords and or properties should be identified and prioritised. Increased costs for landlords that have properties of concern.
- I think it's a really good scheme. I am a landlord that takes my responsibilities seriously and agree that the standard of both private and local authority/housing association is often poor and needs improving. However it doest seem to me that there is sufficient enforcement of these standards and I do wonder given the cuts in funding to Waltham Forest from central government that this scheme is purely being used to bolster income generally. I'd love to know if all the income from these 2 proposals would be used solely to monitor and enforce this scheme and thus drive up the quality of accommodation generally
- Good to have a license, but making all property pay same give no encouragement to have landlord meet good standard.
- Totally unacceptable tax! If you continue to insist on charging this then you should also be visiting each property to check it is in good condition- at least the fee would then be used for something worthwhile
- I understand why you are doing this and when I lived in the borough there were unscrupulous landlords who chopped houses up into tiny flats and filled them with people. But I doubt if those landlords are licensed. If you are going to do something like that then outwitting the council is pretty easy I imagine as they managed to drive a horse and carriage through your own planning regs and get away with it. to me, and many decent private landlords it's just a money-making scheme on your behalf. If we all sell up you will be left with the more commercial or undesirable landlords who can dodge round this kind of thing. My rents are low,my tenants are well looked after, the property is safe and inspected appropriately. I have also lost thousands from one lot of tenants who were awful. This licence does nothing to protect decent landlords, just costs up more than the last licence for no benefit at all.
- Don't make the fee any higher, landlords have a lot of additional costs and moment, so this l'll mean rents having to go up. Why is there a cost at all?
- Drop it. (*repeated 1,112 times*)
- to me it is just another way for councils to make money and good landlords paying for bad. As landlords have paid already if they have not had any issues in the past should not be paying going forward. it is a form of Tax
- I don't disagree with the plan for licencing, though I fear 'good' landlords will be more likely to be penalised than unscrupulous ones with the current system...

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- We need to be much stricter with landlords, and we need to ensure we get tax from them (including all these big build to rent developers that are now in the borough). We need that money to improve the roads etc
- Landlords experience higher insurance costs if they let to anyone with county court judgments against them. People need to be housed and until council housing is built there will always be a need to house ex offenders and other naughty people. Thought could be given to reducing a licensing fee for private landlords willing to let to such people to compensate for the higher buildings and contents costs ensued when declaring cc tenants to the insurers.
- The licensing fee should be scrapped I haven't seen any improvements to any housing conditions
- My main issue is the increased cost of the scheme in 2025 that is considerably more expensive than what was paid when it was first introduced. You need to be reducing costs not increasing them as this just increases rents overall. In a time of budget restraint and decreasing money for people LBWF should not be increasing any costs and should not be using landlords as a means to closing existing government funding gaps.
- The more Polices and regulation will cost Money, this cost will be passer to the tenant,
- Puts land Lords off
- Yes, I think that the price is too high. Is this a way to encourage people to get licences, or a way for the council to make revenue? If you just want people to have licences, let them apply for them, why would you charge at all? Or at least, cover the cost of the licence, not make a profit from already stretched landlords!
- The proposed scheme is essentially an income stream for the council. The fees are excessive. Whilst the previous schemes have been running i have never had any dealings with anyone monitoring the scheme. There are insufficient staff monitoring the scheme which suggests that its sole real purpose is raise further funds for the council. I am not convinced that paying £1,000 per property to licence each property produces any results. The scheme should cover its costs only. It is clear tha the council are using it to raise funds.
- The fees are extremely too high
- The licenses are nothing to do with regulation and everything to do with raising extra revenue for Waltham Forest. For years I have been a decent, fair and safe land with tenants staying for many years because i keep rents reasonable and properties safe, habitable and desirable. Why should I pay a tax that offers NO service to me and has nothing to do with my record as a landlord?
- Fees too high
- Your abuse of power is a disgrace. You are picking on landlords to raise money and win votes. Playing the politics of envy. The issues are with social housing not with the private rental sector. The only reason you are even bothering with this consultation is because you have to. Nothing here will change what you implement. You will ignore anything that we say that doesn't fit with what you have already decided
- If we need a licensing scheme at all the council should make sure that it is done at the minimum cost possible and in any case increases above the inflation rate as the proposal rates are, are simply unacceptable, specially for repeated licences without breaches (same property and landlord).
- I have not seen any benefits of the schrme. I jope rogue landlords are prosecuted. I have 1 property, pay a lot of money to a managing agent. They do very little. Recently had floofing of sewers in the flat. They refuse to compensate, have drains checked regularly. The property is leased. We pay them, and you and a host of other expenses. Renting id no longer viable. If council checked to eliminate landlord appointed agents who supposedly manage estates, and let residents manage, things may improve. At the very least, hold managing agents who supposedly manage from a distance , we may feel better about them continuing.
- I think LBWF should know how to get in touch with landlords so a register should be set up but at a one time admin fee per LANDLORD not per property. There are many existing laws that would allow for the council to then charge landlords fines etc if they are providing inadequate housing, but why penalise the good landlord? Over 10 years of licensing,

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

across 9 rental properties, I have had zero benefit as a landlord, from the previous licensing schemes. ZERO! I have spent in excess of £10,000 on licensing for absolutely zero return. Money that could have been spent on double glazing, or loft insulation totally wasted on some bureaucratic nonsense. And finally, why are private sector tenants and private sector landlords bearing the brunt of blame? The child who died in a moldy house earlier this year was living in social housing. No licence would have saved that poor child. Additionally, myflats are all rented unfurnished, why would ever feel the need to fly-tip? And if my tenants are fly-tipping and behaving in an anti social manner, call the police not the landlord!

- The fees are too high, a lot of the conditions can be enforced through other legislation, and it's one of the reasons I will consider no longer renting out property. While other costs are rising, the additional fee and work involved makes it unsustainable to continue without increasing the rent further.
- I would ask that consideration be given to modest fees for landlords who rent single small properties. Could consideration be given to a discount for landlords already registered with a good, clean record for maintenance, prompt remedial actions etc..
- the fees are too high , will hit l/l who has multiple properties hard
- In general, conditions are much worse for residential landlords, tenants have the support of the government to treat the properties anyway they like and even not pay rent and for many months sometime years landlord can do nothing about it.
- Yes this is a money making scheme for the council who do nothing in return .
- It's very long winded to get a license , it feels like you are studying again for a degree. Good landlords shouldn't be treated as if they could be bad landlords , some of us used to rent and only want what is fair and good for our tenants. Please target the bad landlords more.
- The proposals penalize good landlords. I rent out the flat I lived in for 10 years and may live in again. I work with a managing agent so that tenant issues are addressed promptly and all safety checks and appliance services are up to date. Tenants absolutely have a right to safe and well maintained properties and for issues to be addressed quickly, and it is my responsibility as a landlord to make sure that is the case with the one property that I rent out. Making good landlords pay for the failures of bad landlords isn't fair or justifiable, and isn't going to lead to improvements in conditions for tenants of bad landlords, who will - as always - find ways around these licensing schemes, and will fly under the radar.
- Too expensive Too complicated Simplification required
- I would like to know more about what the Council has actually done on the ground since the scheme has been underway. None of my properties have been inspected as far as I know. Are we simply paying for council officers to administer documentation?
- When the licensing scheme first came out about 10 years ago I wasn't happy. But I was already compliant with the conditions so I only had the cost of the license which in the end made sense as it drives a standard of housing for all. I have always been a responsible landlord and maintained my property to the right conditions and would do so with or without the need for a license. To continue the licensing is fine but I cannot see why the cost has to go up to 900 GBP so as long as the cost can stay the same, that will be good. You could also consider a discount for landlords who maintain a good performance and standard and have repeatedly renewed their license with high marks.
- There should not be new licenses needed. The current scheme should continue and fees should not be increasing steeply each time.
- Find a fairer more honest way to tax the national. Landlords are not cash cows. Most are 'accidental' landlords, avoiding the fees and taxes of selling their property when their family grow/circumstances change. They are hard workers trying to invest for their children's future and their retirement care, because let's face it, the NHS will cease to exist soon! They are those, whose stories you will never know or understand and they are the ones the government want to punish and penalise for their failures. It's disgusting. It's depressing. It's sad.
- Make is easier and simpler for landlords to apply for and obtain an HMO licence. Continuing to apply an exhaustive list of requirements for landlords will only increase costs which then leads to higher rents for tenants. Also, the Council should consider the

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

demographics of the Borough's population whereby there is an increasing requirement for HMO properties. There are many single residents who cannot afford a flat and are better served living in shared accommodation. This is simply a matter of demand. The Council should help landlords in addressing the need for this type of property by either making it easier to apply for an HMO or alternatively removing the requirement for an HMO and applying selective licensing to all rental property types.

- Don't push landlords too hard or they will sell up & there will be less available property to rent
- The licensing is a very good thing. The fees or high fees spoil it and just feels like a money making venture.
- Licencing should be scrapped, it doesn't work and is just an additional tax for landlords who already pay tax on their income
- All good landlords will be providing the information outlined as a matter of course and would be able to provide, it is unfair that good landlords get treated as bad by default There should be consideration for Landlords using agents as the mandatory requirements of letting are already covered and licensing fees to reflect this as fees are already paid to agents Discounts on selective fees for non HMO should be applied to landlords with more than one property The discount for EPC rated properties should be applied from C and further discounted on sliding scale above that, as this is a measure of a well maintained property
- The licensing proposals are appropriate to improve housing conditions within the PRS. However, the license are a bit too high and should be reduced by £50 on each license application. The council should provide full remedial grants for cat 1 and cat 2 hazards to enable landlords to deal with these issues at pace thereby removing these hazards much quicker than presently.
- The fee cost structure is significantly higher than what I would consider to be reasonable. Don't penalise good landlords by charging a high fee. Charge proportionately more to the poor landlords in the area.
- Those who already have paid for the license should not have to pay again for the new license
- It will not be necessary when the government introduce the nationwide portal to keep track of private property. Whilst overcrowding should be policed, LBWF classification of HMOs should be adjusted to allow for flat/house sharing without the HMO classification which should only apply if rooms are completely secured from each other and the 'separate households' are totally independant. Many a property is under occupied in this borough now because landlords won't risk helping out a homeless friend of the tenant.
- Generally for true private landlords I believe it helps to keep tabs on standards and ensure decent houings, however the licence fee places a burden on budgets for disrepair or upkeep. The >£800 could be better spent by landlords to rectify issues. Charities and RP's should be exempt from the scheme.
- The overall objectives are reasonable but the licence fee is far too high and there is no evidence of value for money. Landlords don't benefit and costs are passed on to tenants.
- I have lived in LBWF for over 40 years and letting to families and homes shared by friends is not the problem It is the increasing conversion of properties to single let rooms that destroys the community spirit. Mandatory HMOs already achieve that goal. Joint and several tenancies should be out of scope from the licensing scheme altogether.
- Council and Housing Association properties should have to adhere to similar standards.
- There should be a phased payment system by installments for landlords. A fee of over £800 is alot to pay.
- Remove all schemes where good landlords are charged. Get the money from the council or government or any other means
- It's all too expensive, and too burdensome. It's pretty much convinced me that I won't after all let my property when the time comes, but will simply sell it.
- It's a good idea and weeds out bad landlords but fees are really high. We haven't put our rent up since we bought the flat in 2014 but having to find a big chunk of money puts more pressure on us to do so. Our other flat is in glasgow where the same scheme achieving the same results costs less than £100

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Responsible landlords who have proved to meet all requirements through having successfully held licenses in the previous 5 year scheme(s) should be offered a significant discount on the fees. They should be able to sign a simplified document that simply confirms that there have been no material changes since the last license was granted. This would reduce the administrative and financial burden on all parties.
- I support the objectives of the current landlord licencing scheme and efforts to strengthen the scheme to improve the quality of housing within the borough. That said, as a license holder for 5 years, I am not aware that my property has ever been inspected. I would like to see more evidence of how the scheme is benefitting the borough in practice. i.e. perhaps all licensed properties should be visited 1 x per year to verify that they compliant with borough regulations. This could then be linked to future discounts. Finally as an "accidental landlord", currently working overseas I do not know for how many further years I will remain a landlord. I would hope that if I reoccupy or sell my property in the future, I would be able to count on a pro-rata refund of any future licence fees.
- I think a much cheaper system needs to be devised. The last licence lasted for a maximum of 5 years and was £500. But since then taxes and mortgages have increased massively and I'm renting at a loss. I can't afford £895! Discounts should be offered to landlords based on their costs, the rent they are charging and the condition of their rental properties. Not all properties can realistically improve their EPC rating to A/B especially flats so discounts should be given to those who are no more than one rating below the best rating they can reasonably hope to achieve. Does the borough want good landlords to raise the rents on good hardworking tenants and potentially price out people earning the average salaries of teachers, nurses, social workers, local government workers, etc.? Because private landlords like myself who have the same jobs and bought property to rent in order to improve my inadequate pension income in the future, are not money trees that can be endlessly shook, no matter how good the Council's intentions may be. Also, as previously stated, clarification is needed on what the duties responsibilities of the Council and the freeholders are to landlords in supporting them in addressing anti-social behaviour and other problems that are not directly within their control or their agents. Such as garbage collection, pest control, the maintenance of common areas, security, parking, vagrancy, etc.
- The intentions are good. The reality is different. You dont have the man power to enforce this and you are asking the LANDLORDS to self audit and the bad ones wont. It smacks more of revenue generation that getting things sorted, which will be passed down to the tenant. I do agree that landlords need to behave better as I have witnessed to illegal evictions for no reason (locks changed) and the licence would not have stopped that.
- As in my previous answers I believe that single property Landlords should not be paying this high fee. I also think all Landlords and especially HMO's should be given the choice of either paying the licence or using a Letting Agent. Its very unfair that Landlords like myself who authorise any works that need doing immediately, who use a very good Letting Agent, who have been the target of non paying tenants and ruthless tenants whom have caused so much damage to my property in turn causing so much stress and bad health to myself to continue to be penalised with absolutely no help from the Council. Much more needs to be done to protect Landlords and eviction of these rogue tenants needs to be made easier and quicker.
- I appreciate the opportunity to be part of this consultation.
- No
- There's nothing wrong with this scheme in principle, but unaffordable rents are a far far bigger problem that must be addressed. Where residents like myself with earnings in the higher tax bracket can't find an affordable place to live this has to be a bigger priority
- I'm disappointed by this questionnaire and the councils approach to licensing. It's discriminatory to the LGBTQ+ community. I live with a found family. Because we're not blood or marriage related our well cared for home has been ruined. If we where related the HMO policy would not apply. If the safety rules selectively apply not based on the condition of the dwelling but on the nature of the relatedness of the occupants that is fundamentally wrong. The antisocial behaviour in the area is as much linked to large families as to anything else.
- Just a money making scheme for the council

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- They should be made as strong as possible. Possibly include more about ASB and consequences in information to tenants with action against agents who fail to take action.
- I know the licensing department will say anything to keep their department open as they won't want to lose their jobs but charging landlords doesn't actually improve anything. Having a letting agent in place on a daily basis only way to go. Issues occurred with landlords privately managing the property
- All rented properties in the borough should be in the scheme not just private rented. The council stock is bad and should be in the scheme
- no
- Good landlords are leaving the sector, there will just be less property to let. Bad landlords just dot register.
- I think fees should be lowered for renewals forms should be kept on files and just certificates etc then need loading up less admin for both council staff and landlords. Waltham spends too much time in fines for all things than actually helping people living in the borough
- The Council should stick with the statutory activities that it has to carry out. With so many councils going bust, LBWF looks to be going the same way. Stop it - now!
- Too expensive and will along with Government legislation will result in more properties being sold. Hence contributing to fewer properties to rent, rents increasing due to shortage and even more homeless people !
- I would suggest they be applied borough-wide, but the exemptions be extended to cover all charitable providers as well as RPs.
- You need to licence the tenants. Get them to check the property as we are more than able. Then make sure that they behave themselves in the property. Things I see that are wrong is the tenant not looking after their flat or house. Hanging around all day with nothing to do so sit there smoking and drinking. The rubbish and fly tipping is down to the council not collecting the rubbish so people have to put it somewhere. That's what your concern should be. Then go to the cheap take away that all the tenants eat from and check them out.
- The licensing scheme in LBWF is an active deterrent to landlords. The borough had many largish houses. These are untenable as rental properties. As it is not allowed by the council to let to anything other than a single household. So groups of friends / coworkers / students cannot take advantage of these big enough to share houses. Investors wanting a rental property would be mad to buy in LBWF. As they cannot then rent the property. Better to buy elsewhere. Homelessness and high rents are not helped by the scheme they are actually exacerbated. As it is made hard to rent a property in the borough. When there was a call for help housing Ukrainian refugees it would have been a contravention of licensing to offer a room to these people. As this would have moved properties into HMO status. The planning team at LBWF pride themselves on stating they do not provide consent for HMO permissions. So applying for one is a waste of applicants' time and money.
- Council should get in touch directly by email with the landlords and not expect them to read newsletters to find out when the scheme is due to be renewed.
- As a landlord renting my property to repay a mortgage and using a letting company and abiding by the rules I feel it is important that I like other individuals in these circumstances should be treated as individuals and should be exempt from any fee. However that does not mean the council can do random spot checks every 6 months to ensure the landlord is compliant with the boroughs policy on private renting and where necessary the borough can take the required action under the proposals against each landlord if they do not meet the requirements of the licence. Ensuring letting agents are regulated within the borough is important so that they can ensure landlords on their books are compliant with the regulations under the licensing proposals.
- The implementation of Private Rented Property Licensing by Waltham Forest Council could be considered a detrimental approach for several reasons. Firstly, such licensing schemes often place an undue burden on law-abiding landlords, requiring them to navigate through complex regulations and incur additional costs. This can lead to a discouragement of property investment and, in turn, a potential reduction in the overall housing supply within the area. The unintended consequence may be a housing shortage, escalating rental

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

prices, and limiting housing options for residents. Secondly, private property licensing tends to create an atmosphere of distrust between landlords and local authorities. This adversarial relationship may hinder cooperation in addressing genuine concerns and maintaining property standards. A more collaborative approach, involving open communication and support, may prove more effective in achieving the desired improvements in housing conditions without unnecessarily straining relationships. Thirdly, the administrative burden associated with property licensing can overwhelm local councils and divert resources from addressing more pressing community needs. Instead of focusing on targeted strategies to address specific issues, a broad licensing scheme might result in a bureaucratic quagmire, hindering the efficiency and responsiveness of local government services. Lastly, there is a risk that private property licensing may inadvertently contribute to housing inequalities. Small-scale landlords, who may be providing affordable housing options, might be disproportionately affected by licensing fees and compliance costs. This could lead to the consolidation of rental properties in the hands of larger, more financially robust entities, potentially exacerbating social and economic disparities within the community. In seeking to address housing concerns, it is essential for Waltham Forest Council to carefully consider alternative, more targeted measures that balance regulatory objectives with the need for a thriving and diverse housing market.

- Given the current cost of living and the need for tenants to find affordable housing, additional costs on landlords from the council in paying for landlord licences (which are ultimately passed onto tenants in increased rent) is counterproductive and a waste of time, resource and effort in the council that should be spent elsewhere.
- The quality of the licensing scheme depends on the quality of its implementation. There have been major delays because the scheme appears to be under-resourced. I was also very disappointed by the quality of an inspection carried out at an HMO I owned. The staff member who carried it out appeared very inexperienced and was not supervised on the day.
- The scheme only works if tenants can easily understand if their landlord is following the rules and have confidence the council will quickly remedy any issues. Ideally the council identifies issues before a tenant has to, eg via inspections, as tenants often fear eviction for making a complaint
- We have obtained the license as soon as came into force. Now, renewed. However, I see a lot of properties which have rubbish and not maintained as well as over crowded. Not sure if the license serves the purpose rather than the council seems to be making money.
- This is the worst scheme that has ever been introduced. There should be no fees to pay after a landlord has spent several thousand pounds to pander to ridiculous 'fire' measures. Measures that oddly are not applied to regular home owners. I have yet to meet a home owner that has ANY of these fire regulations in place.
- Landlords have seen profits rise hugely. They should pay a proportional amount towards the council for the impact of let properties.
- Overall, I support the licence and understand the logic. However there are a couple of points to be made. 1. I do not see any effective encouragement for the 'good' landlords. In fact it appears that the licence subsidises the 'rogue' or less attentive landlords. I might suggest a criteria check. If a property meets all or a 90% target, then there should be a substantial discount. Basically, just pay for the property check. That incentivises the landlord to present a property that meets all the criteria from the start. If the criteria are not met, then the landlord not only has to pay the full fee say £895, but also has to meet the criteria or 90%, before the licence is granted. 2. You must realise the landlords will be recovering the licence fee cost. At £885 for 5 years, that represents £15 a month added to a tenant's rental bill. Tricky one, but I still see the benefit of regulation.
- Housing associations and council should also pay the fees so they also maintain properties to the standards they expect from landlords
- Landlords should be given a lot of advance notice of any new scheme and we should see the results of this survey.
- The renting business is huge now. The letting agents tend to put a lot of pressure on the tenants during the application because they know that some of us must rent a property. Few of the agencies are good and care about people, whilst most of them have an attitude

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

of I do not care because someone else will rent the property because YOU ARE ALL DESPERATE. Please check out the agencies as well as the landlords as they all see only money coming in!

- I think this is a terrible proposal and a shameless money grab. If people have a problem with their housing, they will make a complaint through additional channels.
- Absolutely dreadful. Just passes more costs onto renters. Achieving nothing. Renters still won't complain as they don't want to lose the home. Does not help with asb. All just a pointless money making scheme.
- Additional Licences should be scrapped or at least not require existing use and planning - these should be issued per merit and per condition and suitability of the property
- I think the fee for a license is currently far too high considering as a landlord I also have to pay to get all my various certificates done. My license was only valid 3 years and I then had to pay for a new one. To renew a license should also cost significantly less than to get a brand new one imo.
- I welcome the Council's proposals to continue these licensing schemes. I think that it is entirely reasonable to expect landlords to proactively manage their properties for the benefit of their tenants and the wider community. I actually think there should be a national licensing scheme but realise this is outside Waltham Forest's control. Without these licensing schemes, I fear there would be a deterioration in housing standards and environmental quality in the borough.
- If you have a large property i.e 5/6 bedrooms why is planning not being granted for HMO article 4 is blocking this that's nonsense
- Discount if the house is in fine condition, the tenants happy any works required are completed within a reasonable timeframe.
- I think this should remain in the hands of the Council and not become a UK national scheme, where things would not be as well managed.
- We run a first class property business that covers all aspects of licensing as was the case pre licensing being introduced. However in the current period I have been contacted once - to be advised that I didn't have a licence for a property when the opposite was the case! The threatening tone of the conversation soon changed, however it is a complete waste of money if the council wrongly accuse landlords and shows systems are inept. I thus question exactly what this money pays for!
- See comments in other sections.
- The proposals are horrific and unnecessary. Good landlords are punished whilst bad ones don't bother with licences. All the objectives re property conditions and ASB etc are already covered by existing legislation - this scheme simply uses good landlords to pay for enforcement against bad ones. Some of the worst property is council / HA owned & managed, so should be fixed first. The fees in no way align with the cost of providing a licence - they are simply a way to bolster the council coffers - it's disgusting. The scheme has been going for 5 years and there is no evidence AT ALL that conditions have improved for tenants in WF. Where has the £13million + paid in licence fees gone?
- The whole licence is very flawed..with all big stick fines..you must do this , you must do that. When 100% of good landlords get NOTHING from any of this except a big bill..and then get told how well the scheme is doing ,spending money on things I have nothing to do with...it is a tax to pay for schemes that the council should pay for out of the council tax...I do not pay extra for the firefighters or the library...put this is the council putting its fingers in the pie and taking money from hard up landlords..
- It's just a headache. Councils have found a great way to make extra money for doing nothing! And that is the truth. Better to have a helpline or website to report issues with rented properties and you can deal with them as they come in. Charging landlords so you can have a fancy list of rented properties is not really doing anything. Well, tell a lie, every line on that register brings you £700 cash!
- Get rid of licensing or ease the conditions.
- Gov HMO licenses are great and have improved housing, additional HMO licenses possibly help too, but extending this to every rented property in the borough is just a great way to make money. I would be interested to see figures of how much has been gained

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

from licensing one or two bed flats in relation to the money spent on investigating them or improving them.

- Tougher/more frequent inspections. Higher fees to help pay for more officers. Following up/responding to reports of anti-social behaviour. Discourage houses of multiple occupancy. Clamp down on multiple vehicle registrations in one property, should be maximum of 2 per house. Licences should also be suspended when occupants fly tip and leave their rubbish on the pavement, it is often tenants in HMOs who do this. Leyton High Road is often unsafe due to drug taking and anti-social behaviour, fly-tipping. Fewer hostels and bad HMOs would help address this.
- They impose too heavy a burden and will tend to reduce the supply of rental property.
- Just that it feels very very important for the safety and well-being of the whole Borough to keep and strengthen these licenses!
- Fees are too HIGH
- As a Landlord things have been very difficult over the past few years and continues to get more difficult. The selective licensing only adds to the burden. It is not something that is required to achieve the objectives of better housing and living. The council can come up with better methods to meet their objectives without adding extra costs, red tape and stress onto Landlords.
- The scheme is only fair if you enforce the rules and punish the landlords that do not comply
- The council needs to consider the cost of living crisis and the fact that additional fees on landlords such as licensing schemes will end up costing tenants given the need for landlords to add this to the expenses they have to be affordable.
- It appears the licensing scheme is a further burden on already stretched landlords and a means for the council to generate additional funds. Rogue landlords tend to ignore rules of all kinds so these measures simply affect the honest majority.
- Given some of the current repeated problems with ASBs, more action and penalties should be given.
- That the council actually visit these licenced houses to ensure that the landlords are actually doing what they are meant too. As currently I feel that once the landlords pay into the scheme that's it - there is no previous checking of the property to see if it even meets the threshold or even during that time no one visits to see if landlords are keeping up.
- I live next to an hmo property and rear garden has been neglected for many years and is an eyesore to all neighbours plus rubbish in the front is rarely cleared
- Bad idea ; people think that by creating more regulation and introducing more fees they can improve housing conditions.... you can only improve the conditions if you go real work, when you start building, remove most of the regulations that stop people from building more. More charges will cause rents go higher as well. I guess the idea was created by someone who never did real work apart from pushing paper and making tea.
- Instead of all of this, the focus should be on genuine affordable social housing that you can manage yourselves. Instead, you're too busy lining your own pockets, with your £700 per heated toilets, while many who have lived here all/most of their lives are priced out of the borough. Further, your continued investments in the north of the borough is at the expense of the south that has a worse mortality rate. That is inexcusable.
- Landlords are in a difficult position with high mortgage rates(which are not tax deductible) in many cases removing any incentive to continue, in some cases the landlord is having to subsidise as outgoings exceed rental income. If you apply more costs and legislation this will exacerbate the position.
- I believe that tenants of private landlords are often too afraid to make complaints about poor or non-existent maintenance of properties. Therefore prior to licenses being issued the council should engage with tenants. I recognise this could incur additional costs, but landlords are not proving that their property is in good order when they apply for a license. The landlord is only supply some evidence of good character.
- The supporting information in this survey and style of questions are already skewed in support of expanding the licensing scheme (to help the council generate more 'free' money). Hopefully, the views of residents will be truly taken into consideration rather than having this as a tick box exercise. Thank you.

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- I doubt anything will change due to this consultation. The council will go ahead with their licensing scheme as they have done in the past to increase their revenue
- I've been living in Leytonstone for eight years in HMOs and I'm looking for a new room to rent at the moment. There is a real shortage of rooms in HMOs available now and I believe that has something to do with the changes to these licensing laws, or landlords turning their HMOs into whole house rentals in anticipation of the changes. You really need to consider single people without dependents. We also need somewhere to live. You may believe that shutting down HMOs will reduce anti-social behaviour but it will also mean that the only people who are able to live in Leytonstone are people who can afford to rent a whole house or buy their own property. Leytonstone needs everybody and needs to be a home for everybody, not just the people you deem to be acceptable.
- No rentals Both sides of my home have been rentals for over 20/30 years They are a blight on this area as most of the people have no thought about who rent these property All they have brought down the country but in WF it has failed, no care for real people just greed
- Please do away with Property Licensing scheme it does not do anything to improve matters.
- We previously lived in a property that wasn't licensed and I assume there are many of those - how do you ensure that properties are licensed in the first place?
- Penalising decent landlords, without affecting cowboys
- Whilst I appreciate the need to improve housing standards, the proposed/existing scheme unfairly taxes those who already take their responsibilities seriously.
- Council should think of the small landlords who have worked hard to buy another property and are paying a lot of money to provide a decent home for another family. Council should be providing small landlords with support to make these properties into better conditions so that the tenants can have a better living accommodations.
- As a landlord of 30 years standing, at one time owning four properties I have always complied with all regulations, long before private licensing was introduced. My properties were all house shares so I experienced over 100 tenants. I have always had a good relationship with tenants, managing properties to a high standard and complying with all regulations, often going beyond minimum requirements. I find the management of private licensing by Waltham Forest very poor. It is slow, does not seem to target landlords who abuse the system, but targets those who comply with rules. There are not enough staff, and those there are do not seem to be adequately educated in their jobs. I only know of my own experience and that of my tenants but do know of properties that are not licensed and very poorly monitored, if at all. I wish the council would look at all the properties not licensed and/or inadequately managed. Seems WF take the easy option and only monitor those who comply and license their properties. For example, I moved back into one of my properties as my main residence. Three years after moving back I had a personal call from a WF employee very early one morning who addressed me in a confrontational manner about my property not being licensed. I had informed the council when the move happened that it was no longer tenanted but was my main residence. It took three years to follow up in an unacceptable way. Says it all really.
- I think that council's need to acknowledge that there are a lot of good landlords out there. The narrative feels like the starting point is that all landlords are out to milk the rental cash cow with no heed to their tenants. More help for landlords who try to rent to those on housing benefit, with the extra issues that frequently entails and cost in terms of insurance etc. would be good. Acknowledgement that is much more difficult to have an energy efficient property if you don't own the freehold and if your property is older. Acknowledgment that landlords can't always control what their tenants do to lower the quality of their own accommodation (drying clothes inside with the windows closed, constantly leaving food out so mice become a problem, even rewiring things themselves, are problems that I've previously had with tenants) Landlords can't always easily gain access to their properties to inspect them constantly, aren't in control of external or communal areas if they aren't the freeholder and find it very difficult to actually ascertain exactly how many people might be living in a place and sleeping in which rooms unless you turn up to do constant surprise inspections which can then be an invasion of tenant

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

privacy. I am a landlord that doesn't put up rent unless absolutely necessary as I know this expense constitutes a massive proportion of the income of my tenants - however its becoming an increasingly difficult space to make this work for landlords if the property rental is the income that you live on (as opposed to just a long term capital investment).

- Remove separate licencing conditions, landlords should (and are) obliged to meet safety standards such as gas safety certificate, electrical safety certificate etc. landlord licences not required in addition to this.
- Under current financial constraints I don't see that the number of inspections necessary can be done as in my area mwny properties have remained damp and in disrepair despite being in the selective scheme. Also renters are still afraid of making complaints to the landlord or council for fear of losing their tenancy even though law changes mean they can't do so. I live next to tenants with damp properties, no garden boundary fences and who have dangerous broken asbestos in their gardens whose landlords/letting agents do nothing at all yet charge higher rents.
- As I've said on a previous question. Full background checks have to be carried out as there's a lot of fraud carried out in the private sector and with the flat above myself illegally sublet without the Freeholders written consent. (I.e. Myself and the former Owner of the Upstairs flat are the joint Freeholders) and the council have been very complicit with the way the licence was granted and they didn't check the vital information like who are the Property Owners on Land Registry. I have suffered for 6 years and want some explaining about why my situation was ignored. I appealed the decision and yet he's still allowed to let out his property to the same tenant after the Judge from the Appeals Court didn't deem him as Trustworthy and a Fit Responsible person to be granted a licence. This was in October, and from the conditions he was outlined to do, he has done nothing apart from sneak a young Woman in last week. The tenant has never done a proper full days work during the 6 years he has lived there, and can afford to live in a Flat that a lot of professional people would struggle with just doesn't add up. The windows are never opened and the curtains are always closed, so the property is not getting an airing and the window cills are falling apart. The maintenance on his property has been very minimal and if this is what the council deems acceptable then I have fears that this will do nothing to address this very serious problem.
- This in my opinion is another way for the Council to make money unless a complaint is made about properties they do not know how a property is maintained Also there should be a very large discount for well maintained properties
- If this proposed scheme(s) are as poorly run on line as the present one then those who have set up the portal need to be sacked and new people need to be employed to start the whole process over again. The current scheme is as big a mess and miss managed as the Post Office Horizon scheme. The council staff appear to be more interested in chasing for the money than actually doing the job of sorting out the housing problem(s). See my email comments sent during the current scheme and I quote "as user friendly and useful as a chocolate tea pot". I would and could not recommend anybody to rent out property in Waltham Forest under the current system/management.
- For the fees landlord pays we do not get anything in return from the Council. I would like to see a list of Contractors that we could use so we are able to keep our homes up to standard . Also being part of the Selective licensing Scheme you obviously have vetted and approved contractors or we have access to council contractors. As a licence holder this is one of the advantages and discounted rates. I cannot fathom what you do with our funds. Except dictate to good landlords how to run their private buisness . If the council is an extension of our private renting then surely you need to offer better Services to the landlords who are housing homeless and creating jobs in the private sector housing . I do not see these fees as value for money
- At the risk of repetition, it's mainly the wording and implied presumptions that I object to and feel defensive about; synonymous with group punishment for individual transgression. As I've said, there's not even a 'quality mark'-type benefit. The only other licences I have are TV and driving, and there are clear benefits to me as an individual with these. As a landlord I just have to fall in with the greater good benefits without anything tangible for me personally.

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- I oppose the implementation of a licensing scheme. It is not uniformly enforced across all boroughs, and in areas without it, housing conditions are not notably worse than in Walthamstow. Moreover, it adds unnecessary bureaucratic hurdles, and the funds could be more effectively utilized by landlords to enhance their properties or maintain lower rents. A preferable approach would be to expand avenues for tenants to report substandard housing conditions. I doubt that licensing significantly improves tenant situations, as there are already mechanisms in place to address poor housing conditions. Additionally, it unfairly penalizes responsible landlords and inevitably leads to increased rents for tenants, as landlords pass on the additional costs. The proposed licensing fees are excessive. If such a scheme were to be implemented, it should be on an annual basis to mitigate the financial strain on landlords.
- I would like to see WF council engage with renters advocacy groups such as Acorn, the Renters' Reform Coalition and London Renters' Union who will be able to give insight into the experiences of renters who do not always engage with council processes, such as residents who have limited English language or who are afraid of their landlord, or those who work long hours. These people are most vulnerable to unsafe housing and abuse and are least likely to report hazards or respond to consultations.
- Still not happy that short term Airbnb type lets are so cheap to run and it's easy for landlords to ignore the issues caused by them.
- I feel the new proposed fees for selective licensing are utterly outrageous. This is a huge hike from the previous scheme and the proposed aims of the scheme do not justify these prices.
- I'm not convinced it does anything to tackle the really bad landlords, who generally won't sign up to a scheme like this anyway. You are making good, professional landlords pay for a scheme to tackle those who are not good and professional.
- I do not understand why licensing does not apply to housing association properties - they seem to me to have as much if not more substandard housing, lack of communication with tenants and ASB as private sector. I also feel that the number allowed in additional HMOs is too low at 2 unrelated people - with rents so high having 3 unrelated sharers in a house/flat with 3 bedrooms would spread the cost more for them but the conditions required for HMOs are too expensive for many landlords to do
- I am shocked that as a licence holder I was not contacted to inform me of the consultation. In general I don't have any objections to a selective scheme, I do however feel that the fee is unethical, what with changes to tax rules and increased licensing costs I feel that local and central government are partly to blame for the increase in rents. I am considering exiting the market, this is due to having to subsidise my two rental properties from my own pocket.
- As a landlord I know how hard it is keeping the property up to the standards, and I am willing to continue that hard work. Dealing with tenants is not an easy task. All the advice on regulating the rental industry is very much needed. I totally disagree with the proposal fees and I strongly believe in regulating the rental industry without transferring the cost to the landlord and tenant.
- Make it fool proof and give discounts to good landlords who offer good homes on a long term basis and the tenants get a comfortable home and are happy. The licence scheme is not mandatory and should be. There should be a system in place where it is 99% impossible for WF not to know how many properties are let and who the landlords are. Currently, it is the media and TV networks who are revealing poor, rancid, disgusting homes that people are exploited in living in. Why should one landlord pay the licence fee and another not because you have no idea how to identify that landlord. By those measures you offer nothing to the poor tenants or good landlords who comply. That is an unfair scheme.
- It penalises those who comply and not those who do not.
- They should be scrapped. Do you want more or less rental properties? Do you want less supply and higher rents? The licence evidence can be faked and fraudulently obtained as there are no inspections. The cost is ridiculously high and it is a money grabbing exercise. Shame on you.

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Instead of penalising all landlords by imposing this blanket cost, only landlords who are in breach of good standards should be fined.
- Neighbouring boroughs have large scale property licensing already in place, so it makes sense for Waltham Forest to have one too to prevent problem landlords and tenants transferring to Waltham Forest. Having a cohesive approach amongst neighbouring boroughs should raise standards, promote community safety, and go a long way to meet collective objectives across the whole region.
- If there's good landlords they should be exempt from this licensing fee if there bad or rogue then they should be charged
- The licensing scheme has proven detrimental to landlords, resulting in many leaving the market altogether. Additionally, it has contributed to the escalation of rental prices. The inability to rent out HMOs has forced individuals with lower incomes, who cannot afford one-bedroom or studio flats, to relocate from the area. Regrettably, the scheme offers no tangible benefits to either landlords or tenants; instead, it increases homelessness as renting becomes increasingly unaffordable due to lack of supply. Consequently, many landlords have opted to sell their properties, further contributing the housing crisis in the private sector.
- Encourage good practice by rewarding landlords who meet standards with big discounts. Otherwise it feels like another money chasing scheme by the local authority.
- I don't think it is right decision .
- JUST A MONEY MAKING SCHEME BECAUSE THE BAD LANDLORDS WILL NOT APPLY.
- The scheme penalises good landlords that were already doing everything by the book. The rogue landlords will not obtain licenses, they will not honour the criteria that has been put forward by the scheme. Good landlords now incur considerable extra costs due to the scheme, making it harder still to keep rents manageable for tenants and I believe no change to the good standard of accommodation they already provide. As a private landlord it is my own interests to take care of my property and ensure it and my tenants are safe and protected. The scheme does not aid this process in any useful way
- Get rid of it and make life easier for the tenant and landlord. You are just adding extra cost to raise your own revenue, it is a shame
- I find it really repugnant that the council is considering discounts to landlords who own multiple properties and to charities. Effectively this discriminates against the private citizen who votes in the elections.
- there is already significant burden on landlords with different regulations. The licensing and fees will have to be passed onto tenants which impacts affordability. Good landlords will be good landlords with or without these burdens... and bad landlords will be bad landlords regardless.
- This fee is not value for money. The Council needs to revert to their old systems to manage properties. Good landlords should not have to pay this fee. I can't see any benefit in paying this fee.
- Yes, if you are so determined to go ahead, do so without any fees added at all. The renters of Waltham Forest are not your enemy, so do not force landlord to pay you extra taxes and fees because they simply pass it on in terms of higher rents! You're not doing us any favours
- Not agree with any fees to be charged to the landlord
- IWe have been landlords in Waltham Forest for over 30 years but we have had enough We have never had any complaints if fact the opposite We also keep our property in good condition get repairs done immediately and change a fair not excessive rent. We think the PRPL is a way for the council to impose tax on landlords and we have had enough and selling up. A lot of good landlords think the same and we know from our tenants there are plenty of really nasty landlords and that is what you will be left with I would also like to know who regulates housing association properties (council) I have seen some real horror stories in the press
- What is the transfer date for existing license holders that have been issued beyond the proposed implementation date of this new scheme.

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Selective licensing is a massive tax grab. Waltham Forest has never supported landlords, it has pocketed millions and nothing has been done to help landlords ever and nothing to show for in terms of tackling anti social behaviour and other issues. This is just another excuse for Forest council to make huge amounts of money by pretending to help landlords. Police cannot combat anti social behaviour and Waltham Forest council is absolutely useless, you cannot even speak to anyone, let alone ask for help and I don't understand why more tax grabs. I have never received any help, support or assistance and yet has paid many thousands of pounds in tax grab with a pretence to help tackle issues in Waltham Forest which does not exist. Abolish Selective licensing now, it's causing severe financial difficulties to landlords, tenants, causing homeless and more problems such as alcohol abuse, widespread criminalities, social deprivation, mental health problems, suicide, extreme poverty, drug abuse, mugging, assault, property disrepair, accidents, starvation, malnutrition, premature death, racism, intimidation, inequality, overcrowding and many other widespread problems.
- Yes. Good landlords will be willing to come on board with the licensing proposals, as long as they think the charges are reasonable, but there are many rogue landlords who ride roughshod over their tenants and are never discovered and held to account. I know this is what the licensing scheme seeks to correct but I feel it is a drop in the ocean and many rogue landlords are "getting away with it".
- The scheme is just a unannounced tax.
- There should be a simpler way for landlords to manage the license as it is quite confusing when the license changes way the landlords don't get any information regarding this to my knowledge. What we need is a easy way to implement the licensing where one license would cover a multitude of different lets i.e. to share or a family. I believe this is just a money scheme.
- In case councils hadn't noticed - Landlords are selling up - paying tax on a rentals that are making losses due to interest rates is day light robbery from this Gov as is - called S24 tax - and now there's an extra tax being selective licensing. Selective licensing is another burden and is why after 20 years of successfully letting and having very happy tenants we have decided to sell up properties in Waltham Forest and concentrate in better areas like ealing that are more Landlord friendly and encourage this "charity" that effectively landlords are running at current. Widespread selective licensing and the nature of councils that try and impose all their rules on innocent landlords with threatening letters stating this law and the other we see as a form of harassment - and as a landlords we have a choice if to tolerate it or not - and in this environment it is clear it is simply NOT WORTH THE HASSLE. The council should divert their energy into tackling specific problems not targeting every LL who is providing a much needed and valued service that people are needing. as and when tenants leave in WF -we will be selling anything in a selective license area.
- It's a scam!!! Money making for the council that doesn't benefit tenants (increased rents) and is a bitter pill to swallow when you know that WF Council don't provide decent housing stock (my neighbours live in a one bedroom flat with two adults and two teenage children (safeguarding anyone??), and don't do anything about it.
- No further comments.
- We should abolished licensing as it is not contribute towards better housing conditions It's another way of revenue by council with no added benefit
- We are a professional outfit It seems like a tax to us
- the councils are making it hard for landlords. LANDLORDS ARE LEAVING THE HOUSING MARKET THE COUNCIL WILL HAVE TO TAKE RESPONSIBILITY TO RE HOUSE TENANTS
- Only thepat it would seem the Renters Reform will cover all of the conditions of the property license, so why should landlords have to do twice.
- If everywhere in England the licencing is imposed then it is fair, but if not this is just a additional cash flow for the council.
- I think it's essential that they are implemented moving ahead. They give clear expectations to new landlords and when effectively implemented they ensure decent, safe living conditions

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- As previously stated. The police find it extremely difficult to manage anti social behaviour and landlords have no powers whatsoever apart from issuing a notice which has little or no effect. Landlords seem to be blamed for the behaviour of people that they have little or no control over, I wonder if councils were held responsible for the behaviour of their staff when not at work would they look at this problem from a different point of view. Many thanks, P.L.
- Only to reiterate what I have said The amount of rental income should be considered when setting the licensing fee....not a catch all figure for every property There should be some evidence that the council has used the fees to improve conditions ... There should be explicit proposals about where and how the council will be tackling what they claim are problem areas or issues.
- Money making scheme, nothing more or nothing less.
- Get rid of unfit landlords who do not follows laws or rules.
- The proposals make no suggestions for letting agents to provide a role - shouldn't they all be required to sign up to a licence to so that they are deterred from acting as an agent for these errant landlords. In particular the letting of converted garden sheds.
- For me I own only one property which is for my son once he finishes university and start to work. This flat is my first home I bought as a young adult and I want to keep it so I can pass it on to my son. So I rent it to cover all the expenses so I do not have to be out of pocket. I am not running it as a business.
- Scrap it
- N/A
- The council should operate a non intervention approach. Licensing should only be imposed if it is absolutely necessary to achieve the council's objectives. Then only minimal intrusion should be the aim. Private landlords provided an invaluable service to the residents of the borough. Without them housing would be impossible. Homelessness would be worse and councils would not be able to cope. Putting undue pressures on decent respectable landlords across the board is unfair and counterproductive. Already many landlords are selling their properties and the pool of properties available is getting smaller. Councils should operate a proactive hands off approach and deal more effectively with problem areas and landlords. And assist landlords more with difficult tenants. I agree that the council has excluded two wards but the other wards have many many good landlords. Burdensome legislation isn't always the best solution. Waltham Forest could be a leading borough in dealing with problem landlords/tenants if it looked outside the box. Don't just use a licensing system because other boroughs use it. A targeted bespoke approach would cost less and obtain greater results.
- The scheme is not fit for purpose for the fee that is being charged.
- It should not go ahead and be scrapped. It is just an unfair extra cost
- As far as I'm concerned it is another tax, you are raising rents, and landlords are leaving as properties are becoming vacant.
- I do not see why Walthamstow needs a licensing scheme at all. Most of the country does not have Landlord licensing. I totally see that rented property should be of a suitable standard to provide decent accommodation for the tenant but that works both ways and tenants have responsibilities too. My one experience of you intervening was a situation of the tenants own behaviour causing mould due to lack of ventilation and clutter. Your department did not take the time to investigate which would have led to the tenant being advised to change their behaviour. It cost a significant amount to deal with a problem of the tenants own making. If you make it too onerous to be a Landlord then there will be less property available for rent .
- Unnecessary and fees are excessive resulting in a need to increase rents to recover
- Stop ripping of Landlords that are housing the people living in Waltham Forest. Stop treating us as cash cows! We work damn hard it is hard to keep going in the current conditions. Respect us for the service we provide and be grateful by making out loves easier.
- N/a
- This is too much this is like paying another council tax extortionate fees council is run very in efficiently Costs are going to be passed on to tenants with higher rents council is fleeing

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

tenants and landlords what utter scumbags the council are hey why don't you just make the fees 1 million pounds what utter nonsense

- There are many good landlords I. The borough who go the extra mile to support their tenants and they should not be pinalised or treated the same way as those who have a bad record. Increasing fees will only add to the economic and housing crises.
- I don't think these licenses change anything nor improve. Properties should be regularly checked by managing agencies, and where there is antisocial behaviour to be policed.
- There should be more support for landlords, everything in the system is geared around the tenants. The system exposes landlord to unnecessary risk, which is causing them to leave the sector.
- I am a landlord who has met all of the requirements of the license from when it was first introduced - i.e. I am not someone who needs to be "brought up to standard". Why do I have to pay £895 to get a certificate to confirm that I *continue* to be a good landlord? Am I subsidising the work that needs doing with less scrupulous landlords?
- I think it should be scrapped or the fees reduced to help landlord stay afloat.
- There are several landlords, trusts and charities that have been operating in the borough for generations. Most or at least many have a strong record of success and proven reliability with their properties and have developed strong relationships with their tenants. Many of these landlords are considering exiting their business by selling property, often through the auction route, particularly where they have long term tenants. This is potentially diluting the pool of responsible landlords further. Please communicate with your legacy landlords, some of whom have been operating their business for generations, have strong family links to the borough and would like to continue to invest.
- Consider licensing schemes a negative impact on the current rental crisis. Most landlords are responsible and the financial impact will hit all landlords resulting in sales and higher rents which will affect tenants. A means of additional revenue for councils.
- There are a lot of good landlords out there and they should be rewarded. If they have already met the standards required and have a well maintained property with happy Tennant's why should they have to pay another £900. Make the EPC improvement gradings clearer. Focus on where the problems lie. If we HMOs then target these landlords. It is not a one size fits all situation. Reward those that do the right thing
- There should be provision on discount or to remove licence if the tenants are geared for NHS workers
- As a licenced landlord I would appreciate receiving some data about how my fee is spent, eg no. of inspections, investigations, no. of improvements made at council request, no. of legal actions, etc.
- Making houses with less than five occupants part of the additional/selective HMO licensing system is discriminatory to individuals who are not in couples or families, who cannot afford to live in a house with one other person or less. Young professionals, who house-share, with two or three others, have every right to live in the borough. Pulling one or two storey houses or apartments with four sharers or less into additional HMO licensing is creating a shortage of housing for young professionals and ramping up rents for them. The privileging of those who have sex with each other, are married, or those with children is not fit for the modern age and does not reflect how an increasingly number of people live, as more and more people cannot buy a house and will have to rent for their foreseeable future. The objectives are also not answered with the proposals. Why not have a bottom up approach instead, the ability for tenants to have recourse to council enforcement, should their landlord not be providing adequate quality housing, rather than pushing many small occupancy houseshares into HMO licensing, which may mean the landlord has to sell the property and there will be less and less provision of a lower and lower quality.
- No more licensing fee
- As already said, this does not sufficiently improve housing conditions as those landlords who adhere are the ones who would provide decent accommodation anyway. The landlords under the radar are not going to comply. It seems to be just a box checking exercise
- it is just a money making scheme

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

- Many landlords that use letting agents tend to have professional tenants renting who do not have ASB concerns. One might suggest ASB is linked to areas with social housing and high deprivation areas of the borough. A targeted approach working in partnership with Youth Offending team, Early Intervention Prevention service and the police would help you target and support the landlords and properties that require the licensing service. The landlords that rent their properties via the council would have already had the relevant checks carried out and documentation in place before the council would rent their property.
- If you need this scheme to help you regulate private rental properties then apply it but it should be paid for through revenue raised through penalties. If this scheme is so successful in highlighting those landlords that are not compliant then enough revenue should be there. Making landlords pay these ridiculous fees will cause them to sell up and the council will be left with a housing problem. Landlords that are managed by reputable companies should be exempt.
- It is not sustainable for a good landlord to pay ever increasing licensing fees and the ongoing costs of maintaining a viable home to let. Please be mindful of making frequent changes as it affects the livelihoods of landlords too. Thank you..
- Lessen licensing fees but implement other measures to tackle private property state and anti-social behavior.
- I am renting my flat while i am unemployed, rather than claim benefits. At the moment the licensing scheme works well, although I welcome any improvements for Landlords and Tenants.
- Do not proceed with a new licensing scheme
- As mentioned throughout, the licensing is not necessarily the issue for landlords but the enormous costs associated with obtaining the licence is. Landlords in the private rented system are not the problem but are part of the housing solution. Many landlords are exiting the market due to tax changes and the legislative costs levied by councils which are making many landlords properties as loss making which in turn could force landlords to sell, displacing tenants and reducing rental housing stock for families not wanting to own or those saving to buy. I urge the council to be fair with licensing fees.
- No
- Basic licence to check property's gas,electric etc, fire safety. It should be cheaper as it will be passed on to tenants to pay and you will have more people in the Borough struggling in daily lives, which can lead to more drinking,unemployment and anti social behaviour.
- The licensing scheme is an opportunity for the borough to incentivise high quality landlords, but only if it's a voluntary scheme. If it's a mandatory scheme, you will inevitably apply the lowest acceptable criteria because the business case will be driven by volume and not quality.
- This is hitting the landlord with a single property with a huge additional cost (which they will look to pass on to their tenants)
- Overall the licensing scheme is very expensive and requires good landlords to pay for the policing of rogue landlords. In one way or another the cost will end up being passed on to tenants. The discounts on offer are paltry and heavily restricted. A discount for properties with an energy rating of B or higher is laughable in a borough where the vast majority of properties were built in the first half of the 20th century and are thus more than 75 years old. I pay a reputable agent to manage my property, one used by LBWF for social housing. They are very efficient and help keep the property in decent condition. Their careful vetting of tenants diminishes the probability of ASB. Thus I feel I am paying twice for the same thing. A system of licensed/approved agents should lead to at least a 50% discount, subject to positive feedback from the agent and tenants. I feel that alternative schemes have been dismissed out of hand. Many landlords would happily sign up to a voluntary scheme, given now that the alternative would be the expensive licensing scheme being proposed now. When I pay a tax - I consider this a form of taxation - I usually derive benefits from it, such as education, health care, parks and roads. Here landlords are simply being obliged to pay an extra tax which provides them with nothing in return. For example it would be interesting during void periods for landlords paying council tax to be accorded similar rights to other council tax payers, such as temporary residential parking permits in restricted areas. I am sure with a little consultation additional benefits could be negotiated

Q26 Overall, are there any other comments that you would like to make about the licensing proposals

to ease the burden. It is unreasonable for landlords to be expected to police ASB under pain of "criminal" prosecution - draft proposal p43. This could put vulnerable landlords - elderly, female or both - in dangerous situations. The above comments are made as a landlord letting a house to a family. I do not feel qualified or well enough informed to comment on HMOs. It will be interesting to compare any final conclusions with the original draft document.

- You have my opinions already. Police the tenants and agents too. Many agents are in cahoots with tenants that then sublet houses without the landlord knowing. I know of one such tenant and one such agent and I was left with a hefty bill of almost 30k
- This is not rocket science, for those landlords who dont meet the requirement for being fit and proper should pay the fees !
- Please see my previous comments.
- This consultation needs to consider the ending of section 21 notices and new section 8 - the government is introducing an ombudsman with a property portal and this will negate the role of councils. I have written to my MP sir Iain Duncan smith about this. I strongly feel the government should maintain the regulations of private rented property in a local Borough wide scheme not nationwide- local councils are best place to police this not an ombudsman
- Most private landlords want the best for their tenants. Waltham Forest Council by introducing this scheme will not prevent the very bad landlords from continuing unregulated rentals. All this scheme does is introduce an additional charge to the landlord and ultimately the tenant and make life more complicated for all involved. I'm sorry I'm not a fan of this scheme.
- Licensing is good in general. But the cost are too high, especially in these times. Otherwise the costs will just be passed on to the tenants. We want to attract competitiveness and also competence into Waltham Forrest.
- Yet again, council waste and inefficiency is being pushed onto the private sector to fund. In our experience, this scheme has done NOTHING to improve the quality of the properties we let. We ensure that we provide a high quality property that we would live in ourselves. By doing this the property is rented at first viewing. All this added cost of the scheme - and it is a massive added cost that is way out of proportion to the cost of actually implementing such aa scheme. These costs fromt eh scheme are directly passed on as higher rents. My view is the counbcil can't balance it's budget, can't provide the mandated housing it needs and is gouging the landlords and privtae tenants. If you were a businesss your customers would leave. It is only because you are a monopoly that you can continue to do this.
- I appreciate that rogue landlords need to be made to improve their properties- I believe a flat license fee is appropriate of £150-200 - three needs to be an assessment of properties and if you feel do not meet standards then you can tackle these landlords This fee structure is too high - a two level structure is too high - if you must go ahead reduce the fees Put multiple homes owned by one landlord on yearly review - is issuing a licence covering standards unless you're assessing going to improve property standards??
- The scheme is costly and has had no positive impact for me as a landlord or for my tenants. I am a good landlord and my property is maintained to a high standard. This is just another tax the cost of which I have to pass down to my tenants, making rent even more affordable. Poor landlords should be prosecuted and/or fined. I would guess that the main reason for this tax is to bring additional revenue in for the council rather than improve the standard of housing - I wonder if you will publish how much profit you make out of this scheme?! You are making good landlords (and their tenants) pay for the actions of poor landlords, which just isn't fair.
- the whole system is broken, your stuff is the meanest. `You caused so much stress to me. Shame on you
- This is all about making money because the council is struggling financially.
- Money grab from councils Unaffordable for landlords
- Where are my recipes since 2020 for my landlord exorbitant payments, of which I have received absolutely no service, for all that money. where are my recipes for road parking, Why do we have to pay so much if you give no service to these extra costs, which keep going up. What services do you offer good landlords for the thousands of extra pounds they give you during the lifetime of the property licence?? I have asked so many times all I

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have received many years ago was the possibility of pest control but at a rate far more expensive than what I can get. What am I getting for all of this money, if zero service then why??

- it should be abolished the landlords are constantly living in fear, many landlords have panic attacks and the tenants are always having to feel this unnecessary repairs and rent increases due to the license
- We lived in our house with lodgers - we then had to move and rent it out. The scheme makes it impossible for an identical group of people (a couple, 2 kids and 2 other adults) to what was living there to live in it without planning permission for it to be a HMO. This is a bit baffling and discriminates against non-standard family groups.
- I think the licensing should be for HMO's only, and the option of requesting an inspection which we would pay a fee for instead of a licence should be imposed for Private landlords.
- If it is to improve property condition, then there should be benefits for staying compliant. For example, landlords whose properties have not been subject to any issue for the current licensing term should be given half price discount for the next licensing term. It will incentivised landlord to look after their properties. To avoid double standards, since any property can suffer the problem the licensing scheme is meant to help with, the same level of inspection and licensing should be applied to council and housing association properties as well. If the council and housing associations also pay the fees and their properties are subject to the same standard, maybe the fees will be reduced and we can be sure that all properties in Waltham Forest are under the same rules.
- i think my views are pretty clear from what i've said so far, but to sum it up.... I DO NOT AGREE WITH THE SCHEME OR THE EXTORTIONATE FEES AT ALL. I CANT SEE HOW HAVING A LICENCE MAKES YOU A BETTER LANDLORD. I KNOW FOR A FACT THAT MOST OF THESE SURVEYS WILL SAY THE SAME THING, BUT YOU WILL GO AHEAD AND IMPLEMENT IT ANYWAY.
- The proposals are too ambitious to be enforced within the council's budget constraints. The scope of the proposals should be reduced to what can reasonably be enforced. The aim should be to achieve improved standards over the long-term. Framing the proposals too broadly risks achieving nothing meaningful
- Waste of time ,I've been a landlord for 25 years, this is the making more money from landlord
- There needs to be balance between good and bad landlord. Good landlords feel penalised without any incentives to continue running their properties well. They are all tarnished as bad people when they are actually providing good and safe homes to people. By all means tackle the bad landlords, but placing increasingly onerous and frivolous requirement on well run properties and imposing unnecessary requirements are only going to encourage landlords to withdraw from the PRS sector. This is only going to make the available housing situation even more worse.
- The proposed scheme does not tackle ASB problems, landlords have no powers to deal with them. HMO should be licensed separately , single family or couples sharing should not require licence as there is nothing to be gained from it apart from additional red tape and unnecessary cost to landlords, eventually passed down to tenants.
- Judging by councils behaviour in several other matters non property related I have little confidence in their ability to set up and fairly administrate such a scheme
- Interest rates are at an all time high, landlords are struggling to make profits and in some instances are losing money on rented properties. The licensing fees should not be so high and be more reasonable.
- Bureaucracy is costly and paid for by the tenants of compliant landlords. What has been achieved over the last 5 years. For myself, I'm dropping out of the landlord market as licencing is making it unviable.
- please allow three friends to live in a property rather than a 'family' . I still do not understand why a fee exists. We could still submit documentation of certificates for no fee.
- Some properties are let as HMOs but intact they are used as Airbnb.. Such properties should have a very heavy licence.. The council should have a unit that do investigations of HMOs to see if they are being used for Airbnb

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- As a landlord, I see no benefit to the property licensing scheme. My licence took over a year to process and I have seen no benefit for me as a landlord or for my tenants. With mortgage rates rising the property licence fee is a cost I could do without.
- No
- Will increase private rents & won't have much of a positive impact on tenants
- No
- The definition of a HMO is ridiculous. It results in there being properties with empty bedrooms because law-abiding landlords like me won't break the rules, but a property that could house another person or two ends up staying under-occupied. I would not encourage any overcrowding, but was very sad to have a property with an empty bedroom unnecessarily. The fees you charge probably end up being passed onto tenants.
- There has been no evidence that any type of Licensing has tackled anti-social behaviour ... Landlords are left on their own to deal with this ... Landlords might be Licensed but again having to face astronomical lengthy evictions costs! Why should landlords operate within Waltham Forest with all these costly costs, when other Councils do not charge?
- Is there any inclusion for landlords with tenants with disabilities, who may need adaptations to a private rented property for the landlord to have help in those adaptations to cover costs and perhaps get recognition for inclusion and or are given a discount for their acknowledgement of the needs of the tenants' disabilities.
- Overall things need to improve so anyway landlords can be incentivised to maintain their properties should help. Fines should be considered for poorly kept properties internal and external. There is a major problem with rodents due to rubbish in front/back gardens. Landlords need to be advised/encouraged to visit the properties more or use agents to do frequent interim inspections to determine the state of their properties. Maybe those that maintain high standards the fee for monitoring could be offset partially with a discount on annual licensing cost as an incentive.
- I and my neighbour have reported what we think is an unlicensed HMO, and people living in a shed in our street. We reported this in July of 2023. Again in October and again in February 2024. To date we have only received an acknowledgement of our enquiry. Nothing has been done. Therefore the scheme needs to be more robust, tighter, and investigations should occur when residents report matters like people living in sheds in a back garden and many unrelated people in a house.
- The onus and expectation to attend repairs and leaks especially when they affect other properties within a specified (8 week) timeframe and the ability to check the repairs have been delivered satisfactorily needs to be factored in.
- Only that the cost of renewing a licence looks to be too high. Landlords should not be made scapegoats for all damp issues in a property.
- A slightly different issue but landlords should be able to buy visitor parking permits. Otherwise how are we supposed to organise repairs? It's unreasonable to expect small-scale landlords such as myself to buy a business parking permit when I might never need to use it.
- Don't think they achieved their aims, especially with non-HMOs. And are far too expensive. Especially with rising bank rates and maintenance costs etc.
- There really was not enough space here so this is a very condensed version. If you are at all interested I could provide the full text. There should have been an allowance for attachments. Until the Council can demonstrate some real, tangible value to landlords to offset the cost and commitment I'd be inclined to think this initiative is doomed to be poorly supported by the sector at any price. There is really nothing here to see but an empty shell of platitudes and fear of punishment for the landlord. Concerns on Licensing Initiative and Consultation Practices The Council's licensing initiative lacks tangible benefits for landlords, potentially leading to poor sector support. Misconceptions about landlords making a fortune persist, hindering the legitimacy of consultations. Instead of relying on punitive measures, incentivising positive outcomes could be more effective. Key Recommendations and Concerns: Policy Adjustments: - Reinstate the Council Tax hiatus for empty properties during renovations. - Offer reasonable parking permits for property works. Even free. - Enhance functionality of the LBWF Portal for reporting issues. Landlords must be able to report via their own accounts for their properties. Support for

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Landlords: - Support landlords on a case-by-case basis when reclaiming properties. Liaise with them as to reasons and possible resolution. - Lobby for landlord rights and recognize the impact of bad tenants. - Consider refunds for poor or non-existent services. Incentives and Realistic Goals: - Offer incentives for improving existing housing stock. - Rethink unrealistic EPC B-rated discount and focus on achievable efficiency goals. Stretch target discounts for C-rating instead. Responsibility Sharing: - Challenge the notion that landlords alone should handle ASB; advocate for shared responsibility. - Address overcrowding and waste bin provision issues without solely relying on landlords. Critical Examination of Consultation Information: - Critique generalizations about negative community impacts and statistically questionable conclusions. These unsubstantiated claims could be levelled at any sector. - Poor statistical practice in documentation mixing means and medians on charts for example to prove points. This is meaningless. - LBWF needs a more reliable consultation process with better and more robust outcomes. Current LBWF process is poor and open to skewing and vested interest influence. Lack of confidence in the reliability of the results. Real Beneficiaries: - Question the actual beneficiaries of licensing activities. It is not landlords. The Council certainly does. - There are only added responsibilities and expenses without clear benefits for landlords. In conclusion, the Council should reevaluate its approach, address misconceptions, and work collaboratively with landlords to create meaningful and mutually beneficial initiatives.

- Charged to landlord and so indirectly at tenant Proposes to favour large portfolios, when communities benefit more from small landlords Since not all properties are investigated, while everyone is charged it seems inefficient
- The existing and proposed schemes are fundamentally flawed. You are driving responsible private landlords out of the market, the supply of properties is falling and rents are going up and up. Wake up!
- Clearly a money making scheme. Evidenced by the sky high prices.
- Please balance the need for decent properties with encouraging landlords to rent in the borough
- Licensing should be free (or a small admin fee, circa £25-£30) to process the application. Track down the rogue landlords, give them the opportunity (and deadline) to apply for a licence and show that they are complying. If they are unable to do this by the deadline then fine them. The rogue landlords who are not applying for a licence are the problem (not the good landlords who are applying for a licence). Offer a service to tenants to raise concerns about their landlord if they are not being sent the relevant documentation by their landlord (e.g gas safety certificate, CO alarm in the property, copy of the licence), or have raised issues to their landlord but getting no response/ slow resolve.
- Generally the license is much too expensive. This cost, along with rising mortgages and inflation will simply get passed on to the tenant raising rents even further.
- I think you need to think carefully about the costs and the cost burden on landlords, particularly those who only own one property and are already struggling with rising mortgage costs etc.
- The 2019 MHCLG Review of Selective Licensing stated: 11.13 The Act provides a mechanism for the Secretary of State to make regulations introducing exemptions in section 79(4): (4)In addition, the appropriate national authority may by order provide for a tenancy or licence to be an exempt tenancy or licence— (a)if it falls within any description of tenancy or licence specified in the order; or (b)in any other circumstances so specified. 11.14 This review supports such the introduction of exemptions for purpose-built student accommodation that follows a Government approved code76 and non-profit charitable residential institutions that are not registered social housing providers. 1. The Charity's directors/trustees who are themselves Waltham Forest residents, request that given that the recommendation of the review to exempt almshouses has not as yet been implemented that the the almshouse properties have the licence fees waived for the next 5 year licensing period. 2. The Almshouse Charity exists to provide affordable good quality secure housing with staff support for elderly and disabled local people. We aim to make our housing as safe as we can for our sometimes particularly vulnerable residents and actively work with the police, St Mary's church , the council's anti-social behaviour team to try to combat ASB in the areas around the almshouses. The charity has invested in CCTV at 4 of

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its buildings, and soon to fit CCTV to the 5th building, with further investment in CCTV to cover more areas due to take place later this year. 3. CCTV footage is shared with the police and council as required. 4. Many of the residents housed by the charity are former PRS tenants, some were served a section 21 notice in their former accommodation, LBWF has nomination rights. 5. The charity makes grants to local people in financial need, many of these individuals and families are housed by the council some within in the PRS sector, many are in housing association properties or council housing, in particular the charity can help where local welfare assistance is unable to assist the applicant. These grants enable resettlement, particularly where the family has been living in the PRS they may have no furniture to move with, WCAC grants also help top up care leavers grants, provides items for those living in hostels including women's' refuges and those without recourse to public funds. This is an example of grants relating to housing, other community groups are also supported, such as food banks. The charity's newest building Colby Lodge's communal facilities are used for a council supported day care service for frail elderly Waltham Forest residents, the two sessions a week are provided by the Crest charity who are charged a nominal fee for the twice weekly use of the facilities. 6. The licence fee for the charity at the last round of licence renewals was £13,400, and whilst this is a significantly reduced fee from the full fee, and the charity is very appreciative of the reduction, it is counter productive to reduce the charity's income by charging a licence fee for each almshouse, when the purpose of the charity is to work exclusively for the benefit of Waltham Forest residents. 7. The board requests that the licence fee for the charity's housing be waived for the coming 5 years.

- No-one I know who rents in Waltham Forest has ever had a visit to inspect the conditions of the property that they live. I firmly believe that this scheme is not about making properties safer but being used as a money making scheme by the Council. As I said, 10 years I lived in a property covered by the scheme - did anyone ever check that everything was okay/inspect? No Someone was quick enough knocking on the door to ask if it was still owned by the landlord as they've not renewed in time. Did we hear from them again? NO
- Most landlords are good landlords and maintain good standards regardless. The license fee appears to just be an additional income stream for the council and not impacting any improvements.
- The more stringent you make them the more improvements to tenants living standards and quality of life. Quality of life should be everyone's right! Please make these proposals so tenants and areas improve and not to benefit the landlords.
- I think there should be a certificate or some other recognition (e.g database) for landlords that surpass the minimum requirements so that their effort is noticed and also prospective tenants are aware the landlord has been recognised for going above and beyond the legally required minimums.
- Promoting more energy efficiency amongst rented properties should be added to the objectives , and the council should support landlords in their efforts to make rented properties more energy efficient
- Licencing costs are too high and are resulting in rents rising in Waltham Forest A better approach would be to target poor landlords. This can only be done if there was a hot line for tenants to complain to and the council to properly investigate and use existing national rules and policies to address.
- HMO generally can be included in this scheme but we should remove the licence requirement from private rented to single households, as this has a big impact on the supply of available rental accommodation to families leaving them homeless.
- It's too expensive. I've paid twice and not once have the council checked to see how the property is being looked after. Why pay a fee if nothing is done thereafter? There's nothing wrong with my property. I look after it well and my tenant is happy. But I have neighbours living in multiple occupancy and live in terrible conditions. I've called the council yet seen no improvements. Most importantly, please reconsider the pricing for this licence as this will impact on both tenant and landlord relationship.
- Scrap it.

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- Research something better. Do your homework. This is using a sledgehammer to crack a nut.
- I'm very unhappy, I feel I'm being robbed.
- I agree with the objectives but do not see how licensing achieves them.