



# **Improving the Private Rented Sector in Brent**

## **Report on Brent Council's consultation on additional HMO licensing proposals**

**July 2025**

## Contents

|  |    |
|--|----|
| 1. Executive Summary .....   | 0  |
| 1.1 Key Findings .....   | 2  |
| 1.2 Conclusions.....   | 3  |
| 2. Introduction .....  | 5  |
| 2.1 Background.....  | 5  |
| 2.2 Proposals .....  | 5  |
| 2.3 Public consultation .....  | 6  |
| 2.4 Consultation methods.....  | 11 |
| 3. Consultation survey results .....   | 13 |
| 3.1 Overall consultation response.....   | 13 |
| 3.2 Stakeholders.....  | 15 |
| 3.3 Views on the proposed additional HMO licensing scheme.....                   | 20 |
| 3.4 Free text comments on the proposed schemes (for those in disagreement) ..... | 22 |
| 3.5 Views on the proposed additional HMO licensing scheme fee .....              | 25 |
| 3.6 Views on the proposed additional HMO licensing scheme discount .....         | 26 |
| 3.7 Views on the proposed additional HMO licensing scheme conditions.....        | 27 |
| 3.8 Views on the proposed licensing scheme objectives.....                       | 30 |
| 3.9 Views on issues in Brent's PRS .....   | 31 |
| 3.10 Views on the PRS in Brent.....  | 32 |
| 3.11 Views on additional HMO licensing scheme outcomes in Brent.....             | 36 |
| 3.12 Alternative solutions, other comments and considerations .....              | 37 |
| 3.13 Views supporting the proposed schemes .....                                 | 38 |
| 4. Public meetings and written responses.....                                    | 39 |
| 4.1 Public online forums .....   | 39 |
| 4.2 Written representations .....  | 40 |
| 4.3 Letter of support.....   | 41 |
| 5. Appendices.....   | 41 |
| Appendix 1 - Communications and Marketing visuals and analytics.....             | 42 |
| Appendix 2 - Survey respondent profile .....                                     | 49 |
| Appendix 3 - Survey questionnaire .....  | 58 |
| Appendix 4 - Full written representations.....                                   | 76 |
| Appendix 5 – Letter of support.....  | 91 |

# 1. Executive Summary

Brent Council is committed to addressing problems associated with houses of multiple occupation (HMOs) and property licensing is a way of driving up standards and ensuring safer and better managed HMO accommodation. Like all councils across the country, Brent operates a national mandatory HMO licensing scheme for larger HMOs. On 1 February 2020, Brent introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMOs), that are occupied by three or four people living in two or more households. This scheme excluded those licensed through the mandatory HMO licensing scheme and ended on 31 January 2025.

While the past schemes have resulted in significant improvements, Brent believe that a further additional HMO licensing scheme is necessary to maintain and improve the management of HMOs in the borough. HMOs pose a higher risk to occupants, especially when poorly managed. The previous additional HMO licensing scheme has helped to improve standards and management practices of many HMOs across the borough. However, the evidence shows that there is a significant number of properties that are still substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These HMOs pose a risk to the health, safety, and wellbeing of tenants, cause problems for neighbours, and demand substantial intervention from council enforcement services. It is important that the council uses all available tools to improve conditions for tenants in this sector. Licensing is one of the tools and plays a key role in this effort.

A further boroughwide additional HMO licensing scheme is proposed for all HMOs (excluding those licensed through the mandatory HMO licensing scheme) that if approved, would come into force in Autumn 2025. When proposing to introduce discretionary property licensing schemes, the Housing Act 2004 requires councils to take reasonable steps to consult with all persons likely to be affected by the proposed designation(s). Brent Council commissioned Cadence Innova, an independent consultancy, specialising in collaborating with local authorities, to deliver public consultations to undertake an extensive programme of consultation activities and report independently on the findings.

To help inform all stakeholders, a consultation evidence pack was developed by Cadence Innova in conjunction with Brent Council, and this, along with other relevant documents, was available for the duration of the consultation on the council's [website](#). The council also had a dedicated phoneline and email inbox specifically to receive comments and submissions and to communicate with stakeholders for the duration of the consultation.

The consultation ran for 13 weeks from 10 March 2025 until 10 June 2025 and utilised a variety of methods to reach and seek opinions from all those likely to be affected by the council's proposals, both within and outside of the borough.

These methods included:

- an online survey
- two virtual public meetings with landlords, tenants, residents, and landlord groups
- four in-person community drop-in sessions at libraries across the borough.

109 stakeholders were directly contacted and asked for their response to the consultation. Stakeholders included:

- local councillors
- voluntary community sector organisations
- tenant support organisations and housing charities
- emergency service commanders
- all London borough councils.

The council advertised the consultation through digital and print media, as well as in-person methods.

A total of 381 survey responses were received. The survey incorporated a quantitative approach and qualitative responses through free text boxes. Qualitative feedback outside of the survey was also received at two virtual public meetings (the registration page was viewed by 1,439 and attended by 54 people total) and from 4 written representations received from interested parties.

The consultation looked at the level of support for introducing an additional HMO licensing scheme. The consultation also sought views on the proposed licence conditions, associated fees, potential discounts, scheme objectives and the respondents' perceptions of the issues of poor property conditions and antisocial behaviour (ASB) in the borough.

The results of the consultation survey and the views of stakeholders gathered during the consultation are analysed fully in this report.

## 1.1 Key Findings

The following analysis is based on definitive responses. Where a set of responses totals less than 100%, the remaining proportion of respondents answered, 'neither agree nor disagree' or 'don't know'.

| Additional HMO Overall                 |                  | Landlords,<br>letting or<br>managing<br>agents | Private<br>tenants | Owner-<br>occupiers | Other<br>stakeholders |
|--|------------------|--|--------------------|---------------------|-----------------------|
| Total consultation<br>survey responses | 381<br>responses | 152 responses                                  | 54 responses       | 151 responses       | 24 responses          |

|   |                  |               |              |               |              |
|---|------------------|---------------|--------------|---------------|--------------|
| Responses to the<br>question                          | 381<br>responses | 152 responses | 54 responses | 151 responses | 24 responses |
| Agree with<br>additional HMO<br>licensing proposal    | 53%              | 26%           | 56%          | 75%           | 67%          |
| Disagree with<br>additional HMO<br>licensing proposal | 41%              | 63%           | 41%          | 21%           | 33%          |

|   |                  |               |              |               |              |
|---|------------------|---------------|--------------|---------------|--------------|
| Responses to the<br>question                              | 381<br>responses | 152 responses | 54 responses | 151 responses | 24 responses |
| Agree with<br>proposed AHMO<br>licensing<br>conditions    | 54%              | 28%           | 59%          | 76%           | 71%          |
| Disagree with<br>proposed AHMO<br>licensing<br>conditions | 32%              | 49%           | 31%          | 16%           | 21%          |

|                                      |                  |               |              |               |              |
|--------------------------------------|------------------|---------------|--------------|---------------|--------------|
| Responses to the<br>question         | 381<br>responses | 152 responses | 54 responses | 151 responses | 24 responses |
| AHMO licensing<br>fee is about right | 22%              | 12%           | 26%          | 29%           | 29%          |
| AHMO licensing<br>fee is too high    | 46%              | 81%           | 41%          | 17%           | 29%          |
| AHMO licensing<br>fee is too low     | 23%              | 3%            | 19%          | 44%           | 25%          |

| Scheme Objectives                    |                  | Landlords,<br>letting or<br>managing<br>agents | Private<br>tenants | Owner-<br>occupiers | Other<br>stakeholders |
|--------------------------------------|------------------|--|--------------------|---------------------|-----------------------|
| Responses to the<br>question         | 381<br>responses | 152 responses                                  | 54 responses       | 151 responses       | 24 responses          |
| Agree with AHMO<br>scheme objectives | 52%              | 28%  | 52%                | 75%                 | 71%                   |

| Scheme Objectives                                   |            | Landlords,<br>letting or<br>managing<br>agents | Private<br>tenants | Owner-<br>occupiers | Other<br>stakeholders |
|---|------------|--|--------------------|---------------------|-----------------------|
| <b>Disagree with<br/>AHMO scheme<br/>objectives</b> | <b>27%</b> | 43%  | 31%                | 11%                 | 17%                   |

## 1.2 Conclusions

As well as the quantitative data from the online survey, respondents had the opportunity to provide their views in free-text form in relation to several questions. The aggregate online analysis therefore offers only a partial view. The survey data, along with the free-form text responses, virtual public meetings, and other written representation received provide vital insights.

There was a degree of uncertainty or neutrality among respondents, suggesting that many may not have strong opinions or find the issues complex. The proportion of responses classified as 'neither agree or disagree', 'don't know/not applicable' or where a respondent did not select any answer is, in some cases, up to 20%, though generally between 10% to 15%. In the case that respondents were unsure about any aspect of the proposed scheme or consultation, the council invited questions and comments through a dedicated phone line, email inbox, public forums and community drop-in sessions.

It is important to note there was a stark contrast in views about the proposals among different stakeholder groups. While private tenants, owner-occupiers and 'other' stakeholders generally support the council's proposals, the 'landlords, letting and managing agents' stakeholder group, and their representative bodies were generally opposed.

The aggregate online survey data shows overall support for the council's proposals. Views expressed in the free-text responses ranged from positivity that the council is actively tackling issues prevalent in the private rented sector (PRS) such as poor housing conditions, ASB and overcrowding to concerns that the scheme is unnecessary, burdensome, a way for the council to generate revenue and the cost of the licence fee would be passed on to tenants.

A significant number of attendees at the public online forums were landlords and managing or letting agents. They called for greater financial transparency and proposed more flexible payment options to encourage continued engagement with the scheme. They also raised concerns about equity, recommending that benefits such as discounts currently offered to LLAS members be extended to landlords affiliated with other recognised bodies. Other key themes included the quality and oversight of council and housing association properties.

The council received a number of written responses from various stakeholders, both supporting and opposing the council's proposals. Another London borough with a current additional HMO licensing scheme wrote to express their support, recognising the challenges in the PRS and expressed the positive outcomes from implementing their own property licensing schemes. In contrast, landlord

representative organisations such as Safeagent and Propertymark objected to the proposals. They argued that the council should utilise existing enforcement powers to address issues in the PRS.

## 2. Introduction

### 2.1 Background

Between 10 March 2025 and 10 June 2025, Brent Council consulted on proposals to introduce a boroughwide additional HMO licensing scheme. Property licensing is a way of ensuring safer and better standards in private rented properties.

Brent is consistent with the rest of London in that it has a shortage of affordable housing, with house prices remaining out of reach for many. The demand for social housing far outstrips the supply. As a result, private rented property is increasingly becoming the only viable option for many Brent residents, including those who are vulnerable and on low incomes. Currently, 36% of Brent's housing stock is in the PRS, and this is expected to continue to rise in the future.

While the majority of properties in the PRS are well maintained and safe, there is a growing number of properties that are substandard and potentially dangerous. Even landlords with good intentions may not always be aware of the latest legal and safety requirements. These properties pose a risk to the health, safety, and wellbeing of tenants, cause issues with neighbours, and require numerous interventions from council teams that are already under pressure. It is crucial for the council to utilise all available tools to improve the situation for tenants renting properties in this sector. Licensing plays a key role in this effort.

On 1 February 2020, the council introduced a boroughwide additional HMO licensing scheme to ensure safety standards for tenants living in smaller houses in multiple occupation (HMO) that are occupied by three or four people. This scheme ended on 31 January 2025. The scheme has significantly improved property conditions and management standards in HMOs however, the Council is keen to continue the good work and build on the progress already made.

### 2.2 Proposals

Brent Council is proposing to introduce a further boroughwide additional HMO licensing scheme that if approved, would come into force in Autumn 2025 and would last for five years.

The proposals, subject to the consultation, were to implement a new boroughwide additional licensing scheme, with the following criteria:

- (a) An additional HMO license will be required for properties that are rented to three or four occupiers in two or more households that share (or lack) toilet, washing and cooking facilities
- (b) An additional license will apply to HMOs that do not fall within the remit of the mandatory HMO licensing scheme. These are properties that:
  - have been converted into self-contained flats; and
  - the conversion did not comply with the relevant building regulations in force at that time and still does not comply; and



- less than two thirds of the flats are owner occupied
- are multiple-occupied flats in purpose-built blocks (with over two flats) where more than three people live in the flat.

## 2.3 Public consultation

The consultation ran for 13 weeks from 10 March 2025 until 10 June 2025. In order to gather as much feedback as possible from landlords, tenants, residents and other stakeholders, the council used several strategies to promote the consultation.

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce the additional HMO licensing scheme. The consultation also looked at views on the proposed licence conditions, associated fees, proposed discounts, scheme objectives, and the respondents' perceptions of ASB, poor property conditions and other issues in the borough.

Working alongside Cadence Innova, an independent consulting firm, specialising in collaborating with local authorities to deliver public consultations, the council launched a comprehensive communications and marketing campaign to inform all stakeholders about the council's ongoing consultation on the proposed introduction of the additional HMO licensing scheme, with the aim of encouraging active participation.

The communications strategy was designed to inform and educate all stakeholders about the proposed licensing scheme and its potential benefits. The marketing approach was primarily focused on digital activities and online events. However, to meet the needs of the digitally excluded, physical hard copy communications were also made available.

### Communications channels

The council used a wide range of communication channels to promote the consultation and make stakeholders aware of the proposals.

The council undertook various activities to engage all stakeholder groups, both within and outside the borough, and to raise their awareness about the consultation. These activities included:

- Updating the council website homepage with a news article and a link to the consultation on 10 March 2025, 23 May 2025 and then again on 5 June 2025
- A link to the consultation was placed on the Renting in the Private Sector landing web page
- A press release to announce the start of the consultation was published on 10 March 2025 and disseminated via the Brent Council press office
- A press release regarding enforcement day activities carried news about the consultation and was disseminated via the council press office on 23 May
- A press release to announce the consultation would soon close was disseminated by the council's press office on 5 June

- A notification was generated from the consultation portal to 8,710 registered users on 10 March 2025
- A direct email was sent to all London councils, landlord accreditation and membership organisations, housing charities and Brent emergency service commanders on 26 & 27 May 2025.

#### Using the council's social media

- **6** X (formerly known as Twitter) posts with a total of **14** total engagements, **9** shares (re-tweets), **1** comment and **2,540** views
- **6** Facebook posts with a total of, **90** total interactions, **42** likes, **15** clicks, **12** shares and **19,730** views
- **5** LinkedIn posts with a total of **4,441** impressions, **128** total engagements, **83** clicks, 8 reposts and **37 reactions**
- **1** Instagram post with a total of **24** interactions, **20** likes and **1,864** views
- In addition to static organic social media posts containing advertisements to promote the consultation, a video featuring Councillor Fleur Donnelly-Jackson was shared on 6 June 2025 across social media channels (Instagram: 2,482 views, 20 interactions and 20 likes. Facebook story: 410 views, 16 link clicks). The video included information on why the consultation was being held, the ambitions the council held in relation to the PRS in Brent and informed audiences on how to take part in the consultation.

#### Activities to reach out to Brent tenants and residents included:

- An advert about the consultation was featured in the Brent Magazine, published on 19 March and delivered to more than 135,000 homes
- Information about the consultation was included within 5 issues of the resident e-newsletter from 14 March to 9 June 2025 to 17,132, generating 59 clicks
- Information about the consultation was included within the news to headteachers bulletin, sent to 164 Brent headteachers in the March 2025 bulletin.
- Information about the consultation was included in News to all neighbourhood managers on 14 March 2025
- Information about the consultation was included in the Brent Business E-News to 9,042 subscribers and published on 3 April with 1 link click
- An out of home campaign ran with adverts added to 20 digital screens and 32 paper JC Decaux sites within Brent. The out of home campaign ran from 24 March to 4 May 2025
- Pull up banners, leaflets and posters were displayed at:
  - Ealing Road Library
  - Kilburn Library
  - Willesden Green Library
  - Kingsbury Library
  - Wembley Civic Centre
- Information about the consultation was added to digital screens at the following locations:

- Willesden Green x6 screens
- Wembley Library x2 screens
- Civic Centre
- Leaflets were distributed at the following locations:
  - New Life Bible – Presbyterian Church
  - Sacred Heart Church
  - Kilburn Library
  - Wembley Market
  - Queens Park Market
  - Kilburn Salvation Market
  - Harlesden Salvation Market
- Leaflets were distributed to residential homes and businesses within the following areas across the borough:
  - Harlesden & Kensal Green
  - Kilburn
  - Willesden Green
  - Church Road
  - Queen’s Park.

Activities to reach out to landlords included a direct email to 45,552 known landlords, agents and leaseholders on 27 March 2025.

Activities to reach out to landlords outside of the borough included:

- An out of home campaign ran with adverts added to 14 Global and JC Decaux sites from 19 May – 1 June at train stations and roadside sites within neighbouring boroughs in:
  - Barnet
  - Camden
  - Ealing
  - Hammersmith & Fulham
  - Harrow
  - Kensington & Chelsea

In addition, the Chief Executives of the of the following organisations were written to directly:

- National Residential Landlords Association (NRLA)
- British Landlords Association (BLA)
- iHowz
- Safeagent
- UK Association of Letting Agents.

The Accreditation Officer at the London Landlord Accreditation Scheme (LLAS) was also directly contacted.

The following organisations were included on the press release distribution list:

- NRLA
- Arla Propertymark
- Safeagent
- LLAS
- iHowz
- Letting Agent Today
- London Property Licensing website
- British Landlords Association
- Guild of Letting & Management.

Information about the consultation was presented at a landlord training event that was held in partnership with the London Landlord Accreditation Scheme on 12 May 2025 and attended by approximately 15 people.

The consultation was included within x3 Landlords Newsletters, the details are shown below:

- 27 March to 19,555
- 16 April to 971
- 28 April to 19,605

A digital campaign with London Property Licensing (LPL) ran between 12 March to 10 June 2025. LPL is the award winning, leading website for informing private landlords in the UK. It is the only website dedicated to providing simple, impartial and expert advice on property licensing and explaining the licensing requirements across every London borough. The website reaches out to landlords based throughout the UK and those based abroad. Since launching in April 2015, the website has received more than 2 million views. The Brent campaign included:

- From 26 March to 10 June 2025, a pixel banner advert promoting the licensing consultation was placed on the LPL homepage and 8 London borough pages:
  - Barnet
  - Brent
  - Camden
  - Ealing
  - Hammersmith & Fulham
  - Harrow
  - Kensington & Chelsea
  - Westminster
- Anyone clicking on the advert was taken directly to the council's consultation webpage
- On 12 March 2025, the LPL Brent webpage was updated with information about the licensing consultation and a direct link to the council's consultation webpage in the orange 'At a Glance' box to encourage people to find out more and take part in the

consultation. This is an additional feature added during the promotional period. The webpage was updated on 14 April, when the consultation was closed.

- From 19 March to 10 June 2025, a Brent licensing consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultations page and on the same eight London borough pages listed above. The listing summarised the purpose of the consultation and explained how to take part. The consultation webpage promoted consultation events taking place on 30 April and 21 May 2025.
- The Brent consultation listing was displayed on the LPL website and promoted on the home page, the licensing consultation page and the LPL Brent page.
- A news articles about the consultation was published on 13 March 2025 and promoted via social media and the LPL newsletter.
- The Brent consultation was promoted in newsletters distributed on 26 March, 30 April and 5 June 2025. The newsletter is widely distributed to landlords, letting agents, organisations, local authority officers and government officials and sent to at least 3,700 people who have requested updates on housing regulation and property licensing schemes in London. The newsletters also displayed the Brent banner advert with a direct link to the consultation page on the council's website.
- The LPL LinkedIn page and LPL Facebook page carried news of the consultation on 18 March 2025.
- Posts about the licensing consultation were published on the LPL X (formerly known as Twitter) feed (@lplicensing) every 12 to 14 days, timed to cover a variety of morning, afternoon and evening posts, throughout the length of the consultation period. During this period the @lplicensing X feed had more than 2,300 followers, generating impressions, likes, reposts and comments.

Activities to make digitally excluded and vulnerable stakeholders aware of the consultation included:

Reaching out to the following churches and foodbanks:

- New Life Bible – Presbyterian Church
- Sacred Heart Church
- Kilburn Salvation Army
- Harlesden Salvation Army

Posters and paper copies of the consultation were available at the following locations within the borough from 10 March – 10 June 2025:

- Ealing Road Library
- Kilburn Library
- Willesden Green Library
- Kingsbury Library
- Wembley Civic Centre

- Granville Community Kitchen
- Kilburn Street Kitchen
- Salvation Army Lunch Club
- Brent Food Bank
- X6 Sufra locations
- Willesden Mutual Aid

Direct emails were sent to all of the Leader's offices, Chief Executives, Regulatory and Housing services at all boroughs across London on 26 & 27 May 2025.

Chief Executives of the following organisations were sent direct emails:

- Generation Rent
- Cambridge House Safer Renting
- St Mungos
- Homeless Link
- Citizens Advice Brent
- Shelter
- Refugee Council

Activities to make stakeholders within the council aware of the consultation included:

- The consultation was included as an item for discussion at the wider Departmental Management Team meeting, held on 10 March 2025. There were approximately 27 attendees
- Information about the consultation was available on digital screens within the Civic Centre
- Information was included in Members Bulletin to 132 recipients on 20 March, 3 April, 16 April and 1 May 2025
- The consultation was included within all 2,600 Brent staff email signatures
- A notice was placed within the internal newsletter, The Loop on 21 March 2025, sent to 2,759 and clicked 364 times
- A notice was placed on internal channel, Viva Engage on 12 March 2025, receiving 5 likes and was seen by 239
- A further notice was placed on Viva Engage on 16 May 2025, receiving 15 reactions and seen by 340
- Updating the council website corporate homepage carousel to include the consultation
- Posting a news article about the consultation on the council website during the first week of the consultation

## 2.4 Consultation methods

The council used several methods to gather feedback from stakeholders about the council's proposals.

### Online survey

An online survey was open to the general public. Respondents could also request a paper version of the survey. A total of 381 survey responses were received. The consultation survey was the main method of gathering feedback during the consultation. Respondents were asked their views on

additional HMO licensing, the proposed fees, discounts, licence conditions, scheme objectives and their views on issues within the borough. Their responses are analysed and broken down by stakeholder type below. A copy of the survey questionnaire can be found in Appendix 3.

### Public forums

The council held two virtual public forums to provide more information about the proposed scheme and to gather feedback from landlords, residents and other stakeholders who would be impacted by licensing. The virtual public meetings were held over Microsoft Teams and were facilitated by Cadence Innova. This included a presentation of the council's proposals followed by a question-and-answer session with council officers. These events are summarised below:

- 30 April 2025
- 21 May 2025

The above meetings were widely publicised. 11 people registered for the first event with 16 actual attendees. 64 people registered for the second event with 38 actual attendees.

The council held 2 in-person Landlord Forums on 30 April 2025 and on 21 May 2025 at the council offices. The event was open to all landlords and agents operating in the borough to learn more about the council's proposals and to share views. A total of 100 people attended.

The council also held four in-person drop-in sessions (which required no pre-registration) to help stakeholders understand the proposals and to signpost them towards the questionnaire or the dedicated email address to express their views.

| Drop-in sessions |                  |                   |
|------------------|------------------|-------------------|
| Date             | Time             | Venue             |
| 23 April 2025    | 10:30am – 2:30pm | Wembley Library   |
| 6 May 2025       | 10:30am – 2:30pm | Harlesden Library |
| 7 May 2025       | 10:30am – 2:30pm | Willesden Library |
| 14 May 2025      | 10:30am – 2:30pm | Kingsbury Library |

### Other written feedback

The council accepted feedback on the proposed licensing scheme by email or written response. The feedback in the emails received and written responses has been analysed below. The council received 8 email responses regarding the consultation. This included 2 written responses received from stakeholder organisations, found in full at Appendix 4.

Letters of support for the scheme were received from the London Assembly Member for Brent and Harrow and also from another London borough council with a current additional HMO licensing scheme, found in full in Appendix 5.

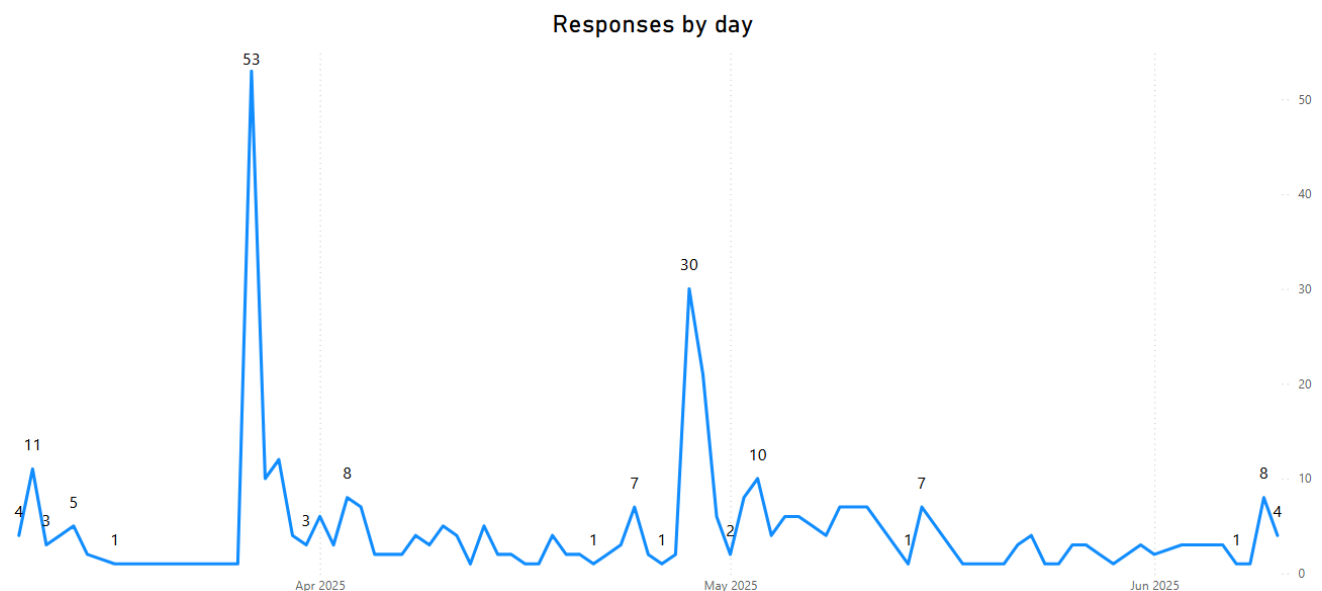
### 3. Consultation survey results

This section of the report presents the results from the consultation survey. There were **381** responses to the consultation survey.

In the following analysis, the percentages are based on the answers to the question and will state where fewer than the total 381 respondents answered the question.

#### 3.1 Overall consultation response

The consultation ran from **10 March to 10 June**, during which time, different stakeholder groups were engaged in myriad ways. The timeline of responses is shown below:



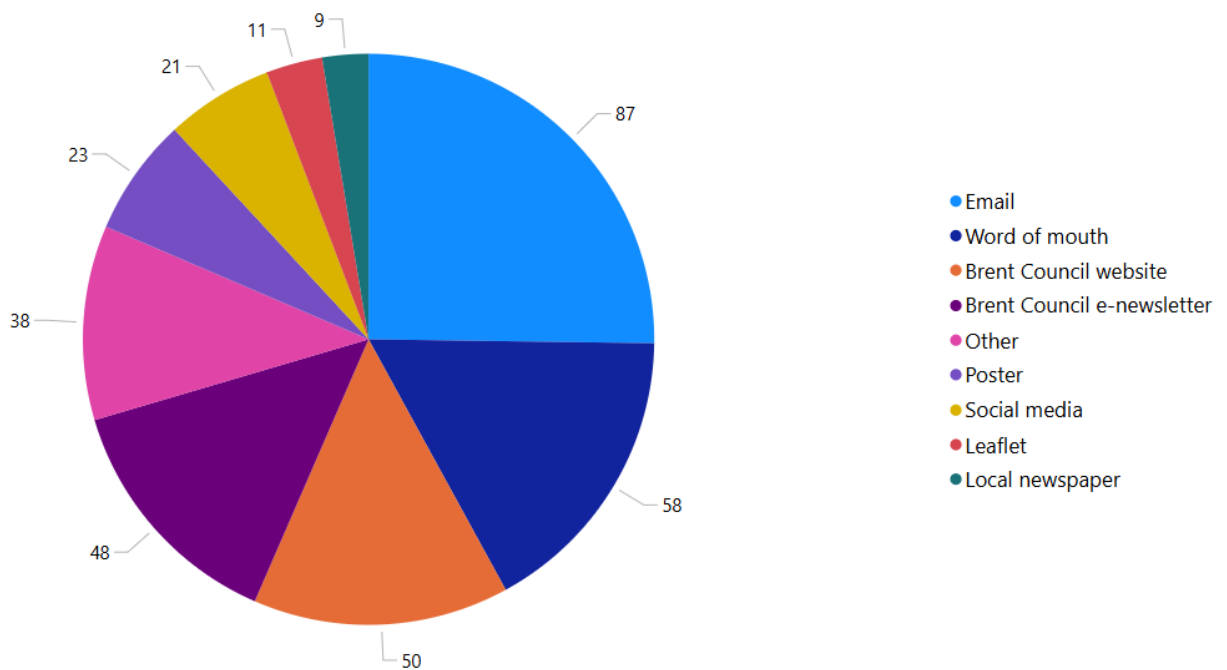
Respondents could optionally give information on the first part of their postcode, allowing for geographic analysis of responses. Of the **257** respondents who provided this information, the vast majority were Brent/London residents, though some responses came from further afield, including Milton Keynes and Norwich.





Respondents were also asked to give information about how they heard about the consultation. **305** respondents chose to answer this question and were able to select multiple options (and due to this, the responses will not add up to 100%). The largest portion of respondents, **87 (29%)** said they heard about the consultation through email, followed by **58 (19%)** heard about it through word of mouth, **50 (16%)** heard about it through the Brent Council website and **48 (16%)** heard about it through the Brent Council e-newsletter.

How did you hear about this consultation?



### 3.2 Stakeholders

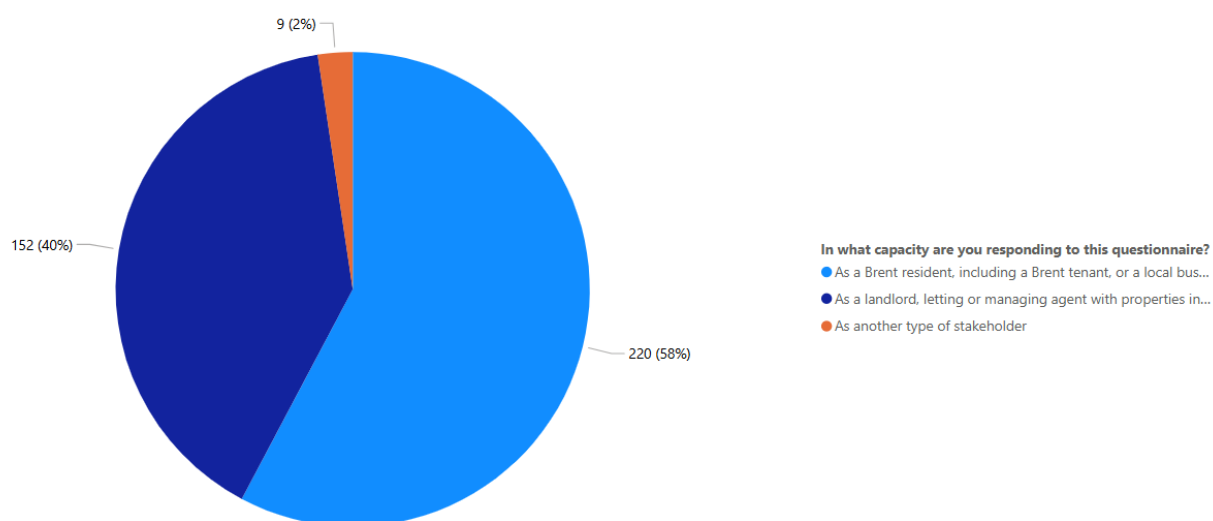
All respondents to the consultation were categorised into the following stakeholder groups:

- As a Brent resident or local business
- As a landlord, letting or managing agent with properties in Brent
- As another type of stakeholder

**58%** of respondents were residents or local businesses, **40%** were landlords or agents and **2%** were other stakeholders.

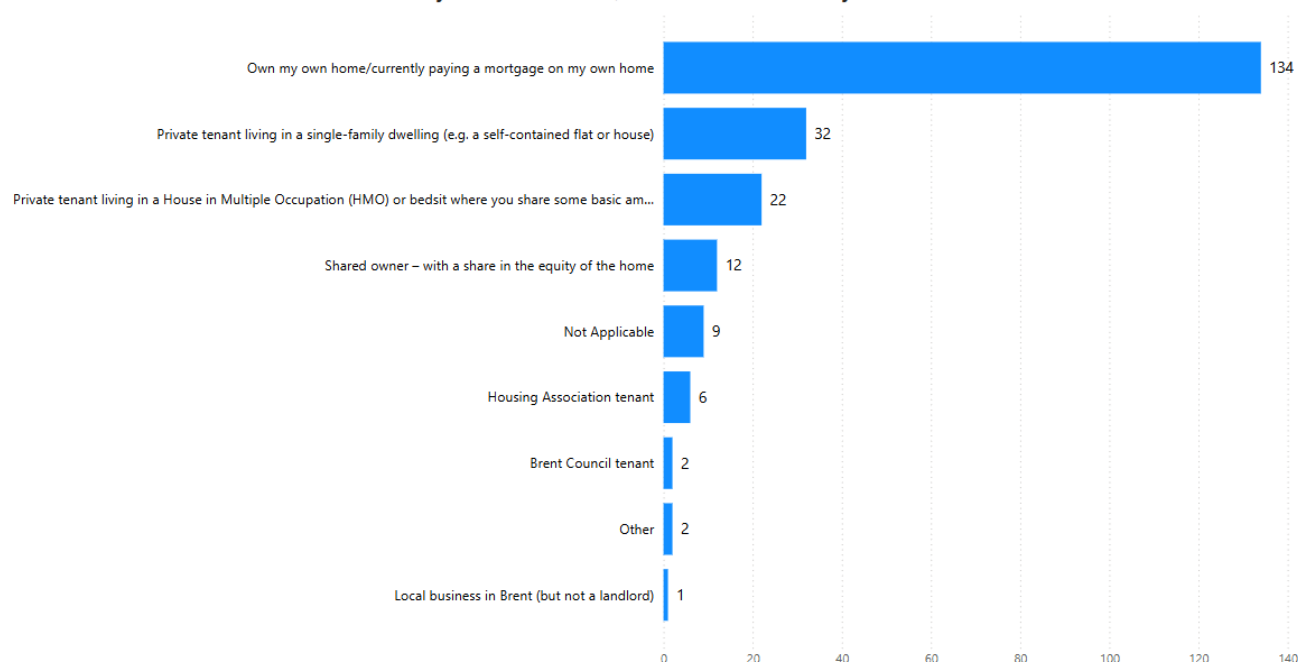
Respondents who stated they were a Brent resident or local business, or a landlord, letting or managing agent were then asked which description would best describe them.

### In what capacity are you responding to this questionnaire?

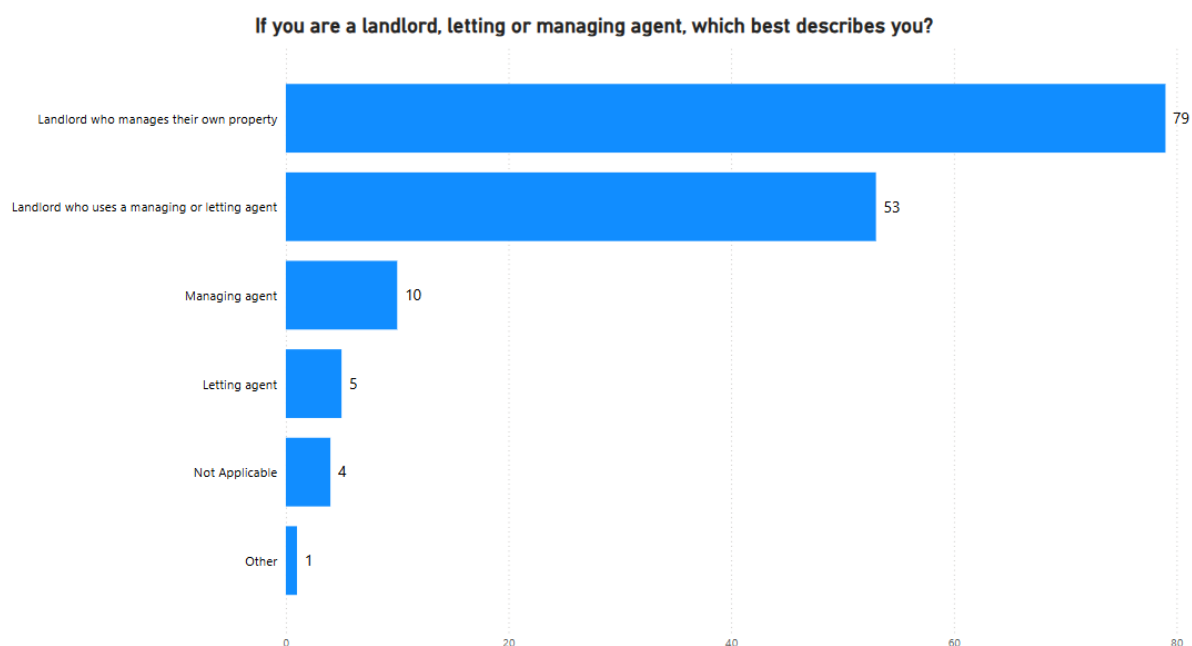


Of the **220** residents and local businesses who responded to this question, **146 (66%)** said they were an owner occupier or shared owner, **54 (25%)** said they were private tenants and **20 (9%)** said they were another type of resident or local business.

### If you are a resident, which best describes you?



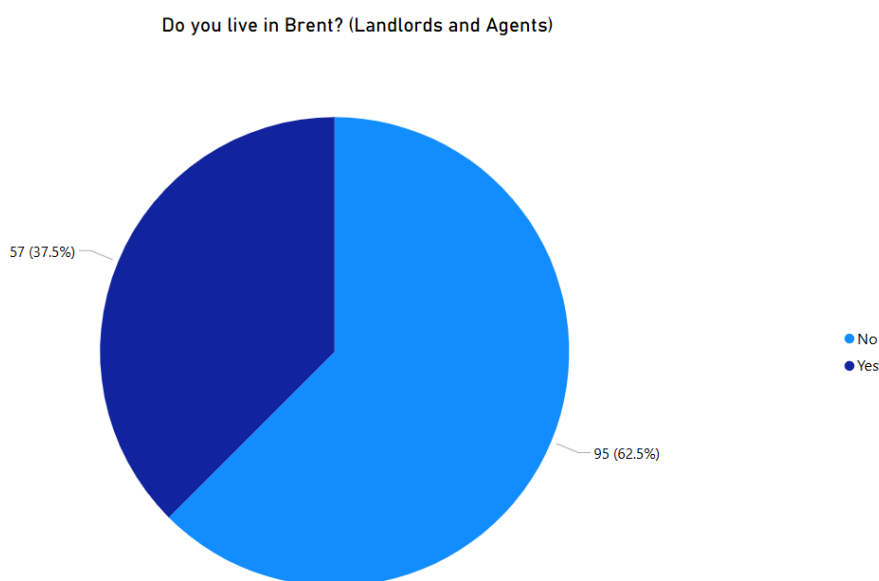
Of the **152** landlords, letting or managing agents who responded to this question, **79 (52%)** said they were a landlord who manages their own property, and **53 (35%)** said they were a landlord who uses a managing agent.



The sum of the resident capacities and landlord capacities exceeds the total number of responses; this is because some respondents have responded as both a landlord and a resident in the same submission. The range of respondents to the consultation shows a good representation of views from different stakeholder groups.

### Landlords' relationship to Brent

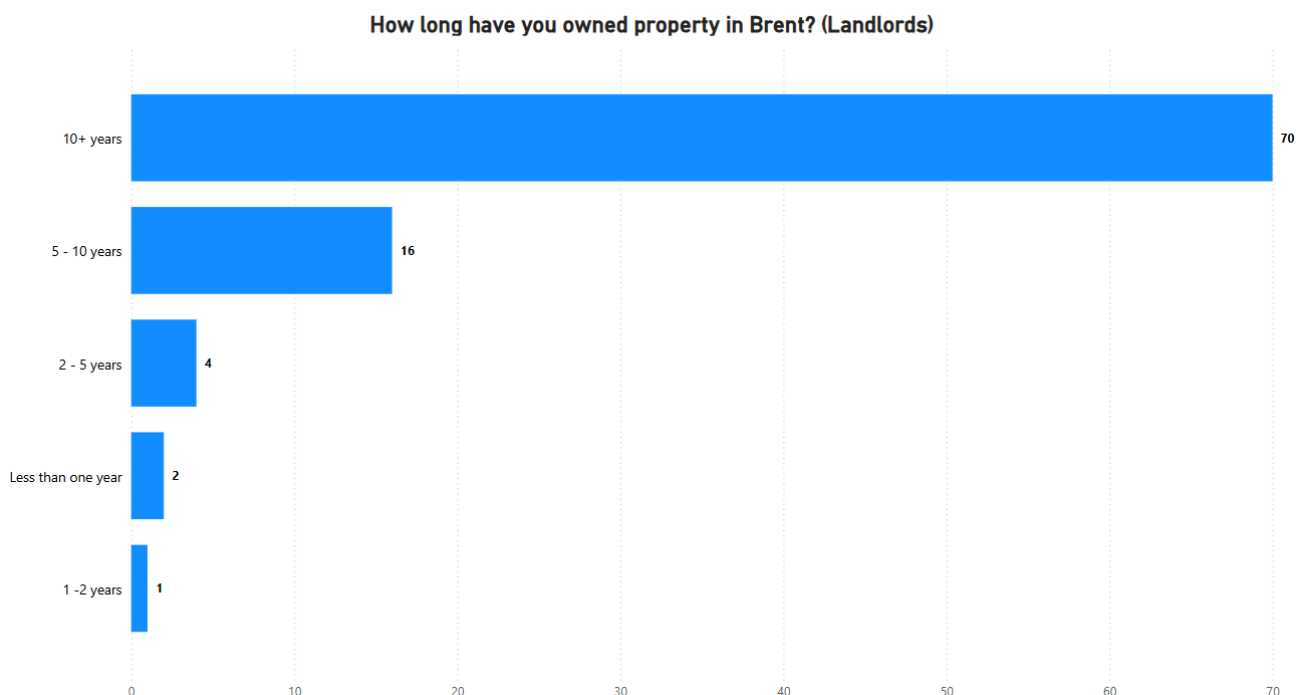
Landlords, letting or managing agents who responded to the consultation were asked if they lived in Brent. Of the **152** landlords, letting or managing agents who responded to this question, **57 (37%)** said they lived in Brent, and **95 (63%)** said they lived outside of Brent.



These results clearly indicate that the consultation reached landlords both within and outside of the borough.

## Length of ownership

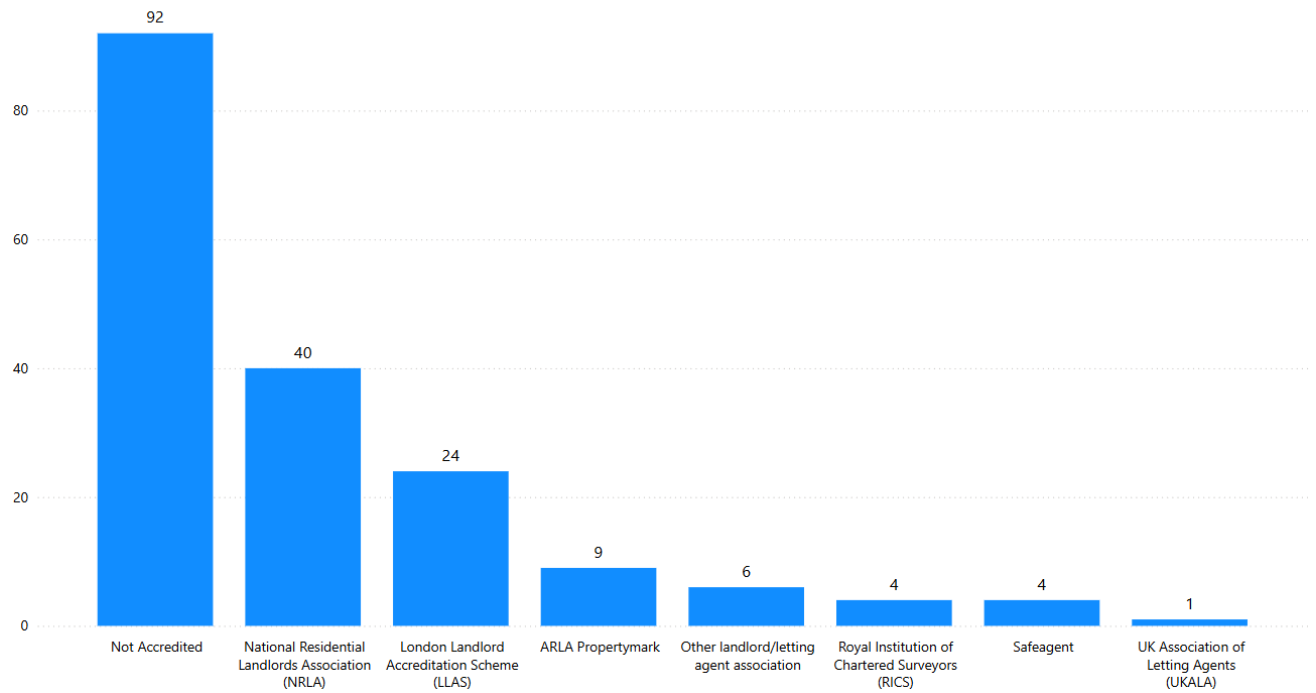
Landlords, letting or managing agents were also asked about how long they had owned property in Brent. The majority of landlords have owned property for more than 10 years.



## Accreditation

Landlords, letting and managing agents were additionally asked whether they belonged to any accreditation schemes (including NRLA, LLAS, UKALA, Safeagent, ARLA Propertymark, RICS). Respondents were able to select multiple options, and, due to this, the responses will not add up to 100%. Of the 152 landlords, letting and managing agents represented by this questionnaire, **92 (61%)** said they were not accredited under any scheme, **40 (26%)** were accredited through NRLA, **24 (16%)** through LLAS and **24 (16%)** through all other landlord/letting agent associations.

### Are you accredited or a member of any of the following?



### 3.3 Views on the proposed additional HMO licensing scheme

The council is proposing to introduce a further boroughwide additional HMO licensing scheme which would apply to all smaller HMOs not currently subject to the mandatory HMO licensing scheme. This section covers the responses regarding the council's proposals.

#### Responses between 10 March to 31 March

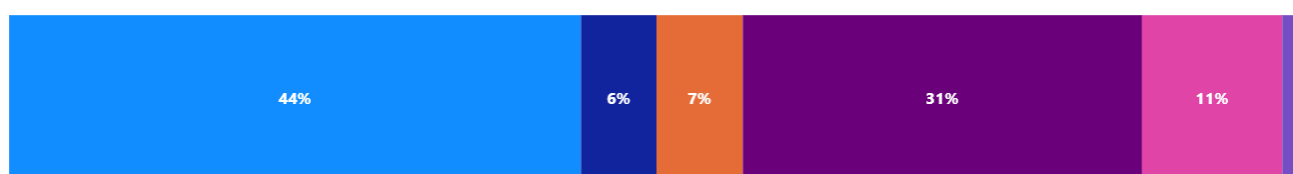
The council identified that prior to 1 April, the online version of the survey question 'To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent' contained a duplicate option for 'Strongly agree' instead of 'Strongly disagree'. This was corrected as soon as the issue was identified, and a notice was added to the consultation webpage. To ensure accurate feedback, the consultation period was extended by two weeks.

The feedback for this question during this time period is shown in the chart below. Of the 120 respondents who answered this question prior to 1st April, **50%** agreed with the proposal for an additional HMO licensing scheme. We have assumed that the 13 respondents who selected the second 'strongly agree' option (second-to-last, pink segment in chart) actually intended to disagree with the proposals. Therefore, prior to the 1 April, a total of **42%** disagreed with the proposal.

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 10/03 - 31/03

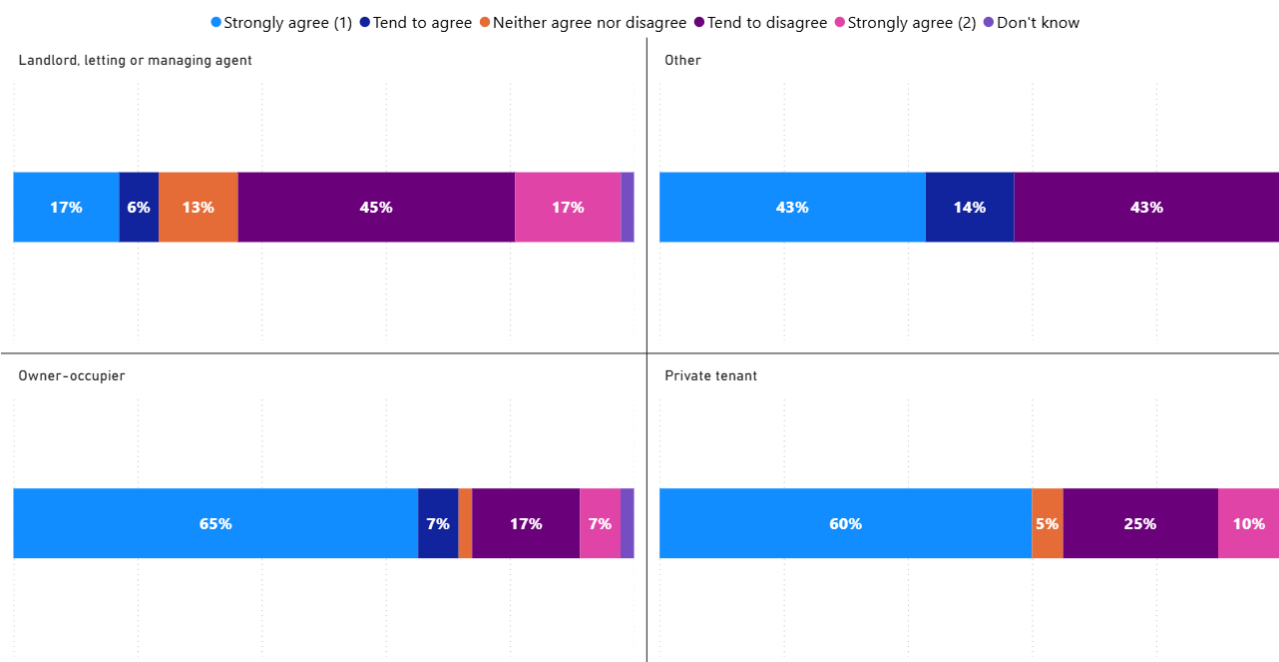
● Strongly agree (1) ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly agree (2) ● Don't know



Looking at the responses by stakeholder groups, opinions on the scheme proposal were split, with private tenants (**60%**), owner-occupiers (**72%**) and other stakeholders (**57%**) approving of the scheme overall, while **62%** of landlords, letting or managing agents disapproved

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 10/03 - 31/03



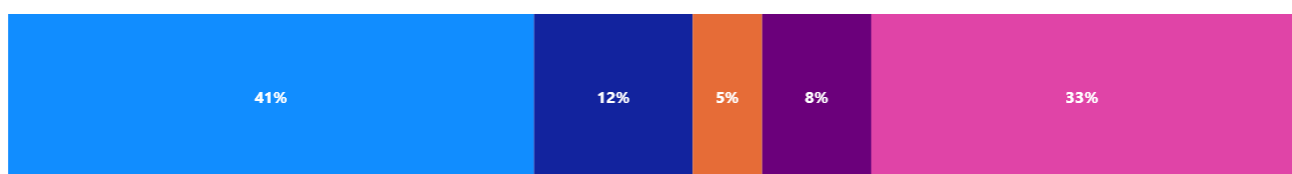
## Responses between 1 April to 10 June

Of the 261 respondents who answered this question on or after 1<sup>st</sup> April (with the amended Likert scale), **53%** agreed with the proposal for an additional HMO licensing scheme, while **41%** disagreed.

To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 01/04 - 10/06

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know

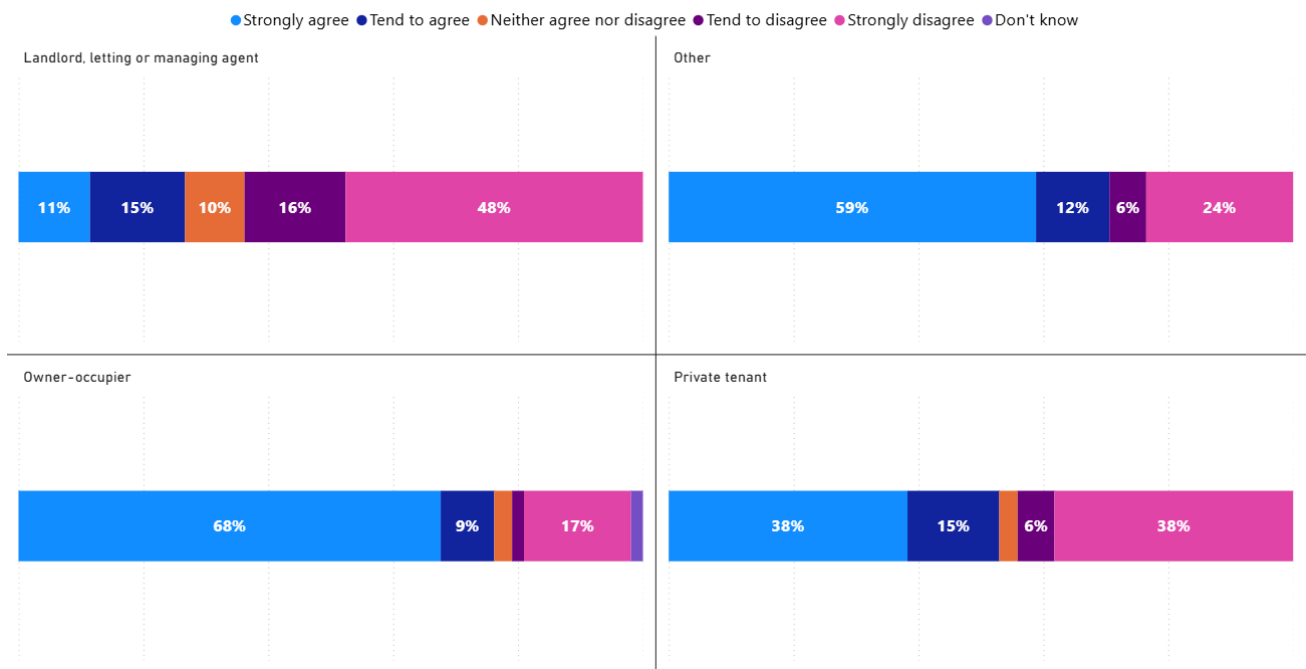


Similar to the first set of responses, the responses submitted on or after 1 April varied by stakeholder group. Again, private tenants (**53%**), owner-occupiers (**77%**) and other stakeholders (**71%**) approved of the scheme proposal, while **64%** of landlords, letting or managing agents disapproved.



To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?

Responses between 01/04 - 10/06



### 3.4 Free text comments on the proposed schemes (for those in disagreement)

The free text comments for the questions asking respondents to explain why they disagreed with the proposed licensing scheme and if they had any further comments/considerations were analysed. The analysis looked at the responses by stakeholder type.

#### Landlords/agents

For landlords/agents, five major themes can be drawn out from the responses:

1. *Opposition to the scheme as a whole:* Many landlords and agents expressed strong disagreement with the proposed additional HMO licensing scheme, viewing them as unnecessary, burdensome, and a way for the council to generate revenue. They argued that existing laws and regulations are sufficient to address any issues with the property conditions and that the scheme unfairly penalises responsible landlords and will fail to remedy problems with rogue landlords.

*'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'*

*'It is taken too far and it is killer for good private landlords. This is a support to larger organisations who don't care about the quality of the housing. The government is looking for easy cash.'*

2. *Concerns about increased costs and rents:* Many landlords and agents expressed concerns that the licensing scheme will lead to increased costs, which will ultimately be passed on to tenants in the

form of higher rents. They argued that this will exacerbate the already difficult housing shortage and make it more difficult for tenants to afford rental properties.

*'Adds additional costs to landlords which will then be passed on to tenants in increased rents. Council already has sufficient powers to deal with any reported problems. Licensing is an unnecessary layer of additional bureaucracy and cost.'*

*'All additional costs will be passed to tenants, along with additional costs to cover extra administrative time.'*

*'By continuing to add more restrictions and objectives you are increasing the rents for tenants.'*

3. *Focus on targeting rogue landlords:* landlords suggested that instead of implementing a blanket licensing scheme, the council should focus on targeting and penalising rogue landlords who are not complying with existing regulations. They argued that this would be a more effective approach to improving property conditions and protecting tenants and not penalise landlords who already have properties that meet high standards.

*'Good landlords are already doing the right and correct things for their properties and tenants. Resources should be focused on targeting rogue landlords and not penalising all landlords with this additional extortionate cost.'*

*'Rogue landlords need to be targeted individually.'*

*'Pursue bad landlords - you could consider criminal convictions instead of making things more onerous for landlords who want to provide a safe and healthy home for their tenants and are struggling to afford to continue.'*

4. *Utilise existing powers/legislation to target issues within the PRS:* some landlords and agents expressed that the current powers the council has to tackle problems with poor property conditions and ASB are sufficient.

*'Government legislation is already in place to cover most licensing conditions, local licensing just doubles bureaucracy.'*

*'Use existing legislation where necessary. The council already has extensive powers to enforce property maintenance and anti-social behaviour and put the council's resources into specifically targeting problems and property.'*

5. *Lack of faith in effectiveness of schemes and council management:* some landlords and agents expressed scepticism about the council's ability to effectively manage and enforce the licensing scheme. They cited examples of poor management of existing licensing schemes (both in Brent and other boroughs) and lack of inspections as evidence that the scheme may not achieve its intended goals.

*'We don't see much enforcement action that actually improves the area.'*

*'The new licensing process feels more like an extra tax than anything else. There are very little checks and the cost is very high.'*

*'Licensing has not seemed to have changed much in the borough since it launched in 2017.. it does not support decent landlords, and we do not get the service required for the fees we are paying!'*

### Residents/local businesses

For residents/local businesses, similar themes were evidenced, with a greater emphasis on increased costs for tenants:

1. *Concerns about increased costs:* many respondents expressed concerns that the proposed licensing scheme would lead to increased costs for landlords which would ultimately be passed on to tenants in the form of higher rents. They argued that this would exacerbate the already high cost of living in Brent and during a cost-of-living crisis.

*'It is an extra cost to landlords who will inevitably pass it on to tenants and the effect it will have will be to raise rents and make housing even more difficult to access.'*

*'All additional costs will be passed to tenants, along with additional costs to cover extra administrative time.'*

2. *Focus on enforcement of existing laws:* several respondents suggested that the council should prioritise enforcing existing laws and regulations rather than implementing a new licensing scheme. They argued that there are already measures in place to address poor housing conditions and ASB and that the council should focus on effectively enforcing these laws.

*'Legislations already exists in terms of fire safety, building regulations and regulation of the number of people living in a house.'*

*'Government legislation is already in place to cover most licensing conditions, local licensing just doubles bureaucracy.'*

3. *Criticism of Brent Council's own housing management:* many respondents criticised Brent Council for not adequately maintaining its own social housing properties. They argued that the council should address the issues within its own housing stock before targeting issues within the PRS.

*'you are risking my landlord increasing the rent and what for most small HMO's dont need your help Blocks of council flats or even my neeighbour that is a Housing Assoc property is more poorly managed and anti social behavior esp the front garden'*

*'Only controlling private housing isn't a solution. Brent has vast housing stock made-up of council/housing association properties where standards are very poor and not under control.'*

4. *Impact on rental market and housing supply:* some respondents expressed concerns that the licensing scheme would discourage landlords from renting out their properties, leading to a decrease in the availability of rental housing. They argued that this would further worsen the housing crisis in Brent.

*'It will add to housing costs and reduce the supply of rental properties'*

*'These additional licensing in Brent (and other paces) have resulted in less landlords, less choice and competition for tenants and higher rents year on year.'*

5. *Need for targeted approach:* several respondents suggested that the licensing scheme should be more targeted, focusing on specific problem areas or landlords rather than applying to all properties. They emphasised the importance of addressing the issues caused by a minority of landlords without burdening all landlords with additional costs and regulations.

*'Stop targeting landlords and only look at target areas like Wembley Central & Harlesden'*

*'There is no value in having a licence to good landlords whose tenants-are happy - brent council know bad landlords and properties in disrepair including their own properties- they should fix these rather than tax landlord of single well maintained property. Collect fines instead from bad landlords and inspect properties in a manner like food 5. Star venues'*

### 3.5 Views on the proposed additional HMO licensing scheme fee

The consultation asked respondents for their views on the proposed licence fee for the proposed additional HMO licensing scheme. Information about the proposed licence fee was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed additional HMO licence fee of £1040 for a five-year licence is.

### What are your views on the proposed additional HMO licensing fee?

● Too high ● Right level ● Too low ● Don't know

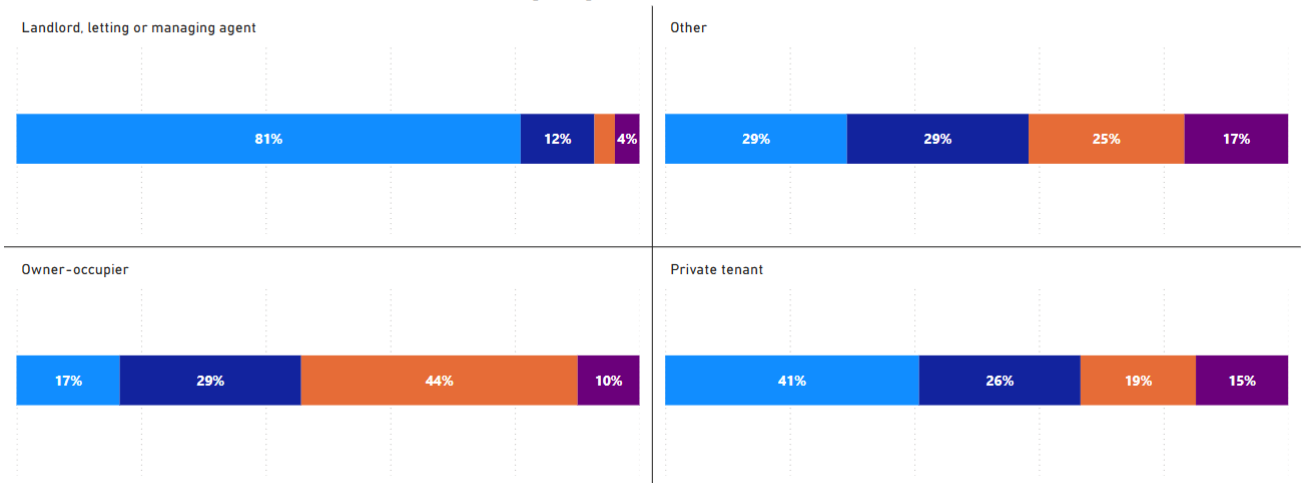


Of the **381** respondents who answered this question respondents, the largest proportion, **46%**, said that they thought that the fee is too high.

Opinions on the fee varied considerably by stakeholder group. Landlords, letting and managing agents were the most consistent in responding that the fee is too high, with **81%** selecting this option; the “Other” stakeholder group had an equal portion, **29%**, thinking the fee was too high and about the right level, **41%** of private tenants responded that the fee was too high, while **44%** of owner-occupiers responded that the fee was too low.

### What are your views on the proposed additional HMO licensing fee?

● Too high ● Right level ● Too low ● Don't know



## 3.6 Views on the proposed additional HMO licensing scheme discount

The consultation asked respondents for their views on the proposed licence fee discount. Information about the proposed licence fee discount was provided within the consultation documents.

Respondents were asked how reasonable they feel the proposed additional HMO licence fee discounts of £40 for LLAS accredited landlords was.

What are your views on the proposed additional HMO licensing discount?

● Too high ● Right level ● Too low ● Don't know

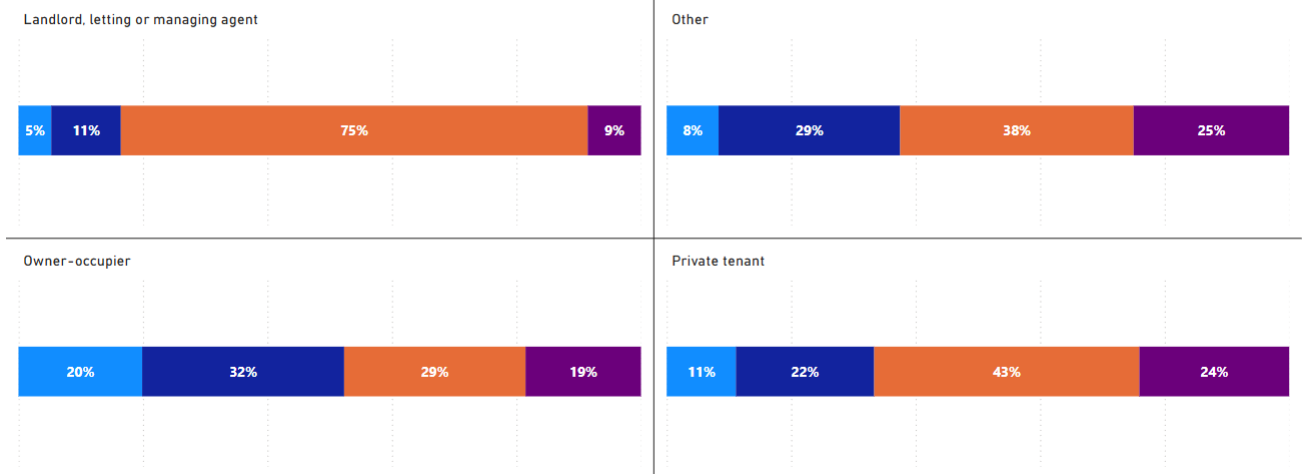


Of the **381** respondents who answered this question, the largest proportion, **50%**, said that they thought that the discount is too low.

Opinions on the fee varied by stakeholder group. The largest proportion of landlord, letting and managing agents (**75%**), 'Other' stakeholders (**38%**) and private tenants (**43%**) all indicated they believed the discount to be too low, while owner-occupiers were split, with **32%** saying it was about right and **29%** saying it was too low.

What are your views on the proposed additional HMO licensing discount?

● Too high ● Right level ● Too low ● Don't know



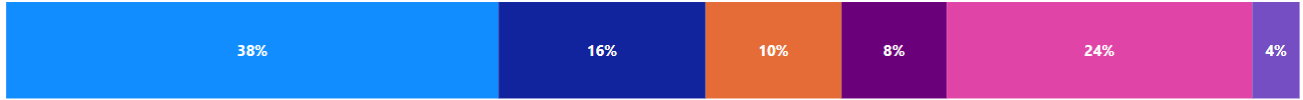
### 3.7 Views on the proposed additional HMO licensing scheme conditions

The consultation asked respondents for their views on the proposed additional HMO licence conditions. Information about the licence conditions was provided within the consultation documents.

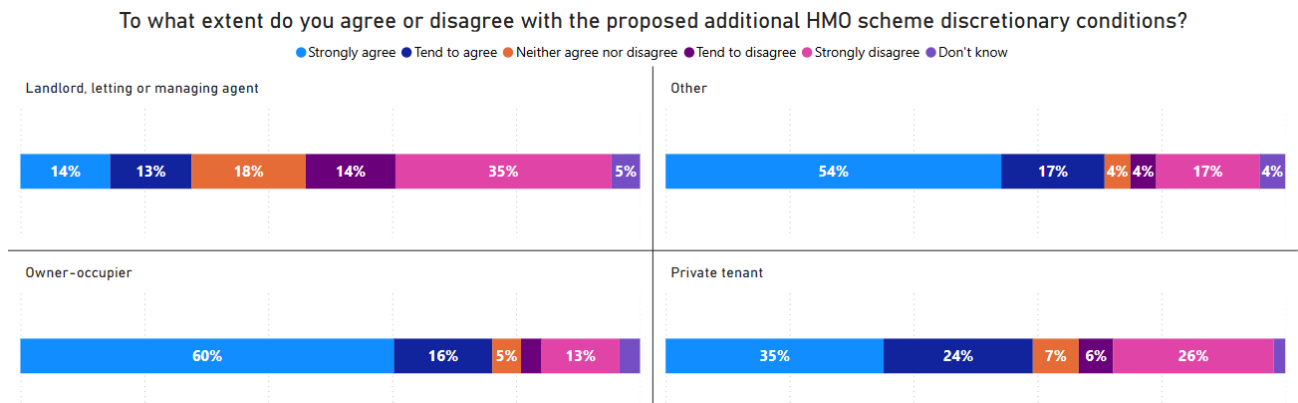
Of the **381** respondents who answered this question, the majority of respondents, **54%**, agreed with the proposed licence conditions, while **32%** of respondents disagreed.

To what extent do you agree or disagree with the proposed additional HMO scheme discretionary conditions?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



Looking at the responses by group, landlords, letting and managing agents are largely opposed, with **49%** disagreeing with the additional HMO licensing conditions. Private tenants (**59%**), owner-occupiers (**76%**) and 'Other' stakeholders (**71%**) are all majority in favour of the additional HMO licensing conditions.



## Free text comments regarding the additional HMO licence conditions

The free text comments for the questions asking respondents to explain why they disagreed with the proposed additional HMO licence conditions were analysed. The analysis looked at the responses by stakeholder type.

### Landlords/agents

For landlords/agents, several themes emerged, but especially the notion that the current regulations and requirements are enough and that additional conditions are unnecessary.

1. *Excessive burden:* many landlords and agents argue that the proposed additional HMO licensing conditions are excessive, place an unfair burden on responsible landlords (and in certain cases should be the responsibility of the tenant) and should not go further than national law.

*'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'*

*'Brent has overstepped its legal authority by a long way by trying to impose non-statutory standards on landlords.'*

*'The discretionary conditions will apply a prohibitive burden of costs on landlords which will likely make then letting of some properties no longer viable and therefore make worse the housing crisis. The mandatory regulations that are already in place are sufficient.'*

2. *Impact on rents and housing supply:* landlords expressed concerns that the additional costs associated with meeting the additional HMO licensing conditions will ultimately be passed on to tenants in the form of higher rents or resulting in housing shortages from landlords leaving the market. They believed that this will further exacerbate the affordability crisis in the rental market.

*'Not necessary. Laws already in place to combat poor accommodation issues. Already a shortage or rental properties in London - this makes it harder for la floes and therefore reduces properties available for rental.'*

*'It's too bureaucratic and landlords are already selling up to the detriment of tenants who will have nowhere to live'*

### Residents/local businesses

Similarly to the responses from landlords/agents, a common theme was that the licence conditions are covered by existing law. There was also a concern about the impact on tenants and that added requirements could lead to increases in rent and decrease in supply.

1. *Focus on existing regulations:* respondents expressed their disagreement, in many cases questioning the need for additional regulations and suggested that existing laws and enforcement should be sufficient

*'The requirements are already stated in law. Another layer of expensive bureaucracy is not needed'*

*'There is enough conditions in the system at the moment. The Council should be looking at its power to educate, regulate and inspect rather than additional conditions and costs on all concerned.'*

2. *Impact on tenants:* several respondents raised concerns about the potential negative impact on tenants, such as increased rents, reduced housing options, and difficulties in obtaining references or finding accommodation due to stricter regulations

*'Mandatory conditions are already enshrined in legislation, imposing a license to all landlords will result in higher rents + landlords selling there letting properties and less housing available in the city. It is a completely counter productive measure.'*



*'pushing more private landlords with measures like these had lead to the housing crisis and higher rents, driven by local councils like brent'*

3. *Enforcement*: some respondents raised concerns of the council's efficacy to enforce the scheme and questioned its effectiveness.

*'These are only effective if Brent Council actually enforces them , but it's very apparent that this is not happening at present.'*

*'I also repeat enforcement of regulations is key and not happening.'*

### 3.8 Views on the proposed additional HMO licensing scheme objectives

The consultation asked respondents for their views on the proposed licensing scheme objectives. Information about the licensing scheme objectives was provided within the consultation documents.

To what extent do you agree or disagree with the proposed additional HMO licensing scheme objectives?

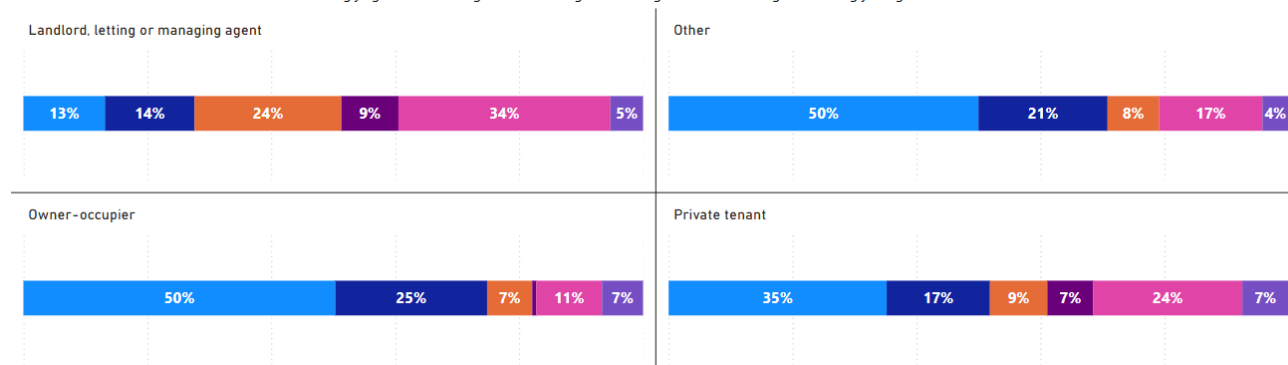
● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



Of the **381** respondents who answered this question, a majority of respondents, **52%**, agreed or strongly agreed with the proposed licensing scheme objectives, while **27%** of respondents disagreed or strongly disagreed.

To what extent do you agree or disagree with the proposed additional HMO licensing scheme objectives?

● Strongly agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



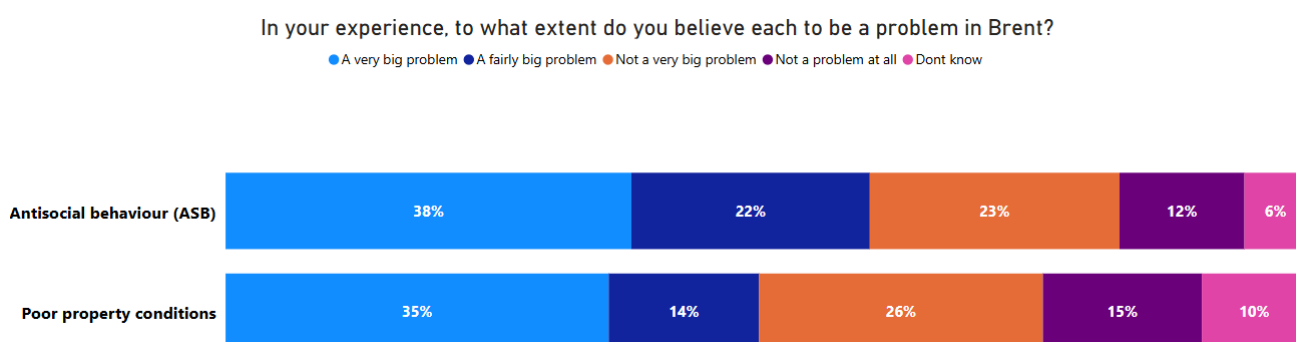
Looking at the responses by group, landlords, letting and managing agents are largely opposed, with **43%** disagreeing with the additional HMO licensing scheme objectives. Private tenants (**52%**), owner-occupiers (**75%**) and 'Other' stakeholders (**71%**) are all majority in favour of the additional HMO licensing scheme objectives.

### 3.9 Views on issues in Brent's PRS

Respondents to the survey were asked their opinion of issues relating to ASB and poor property conditions in private rented properties in the borough.

Respondents were asked to what extent they believed that poor property conditions and ASB are problems in their local area of Brent.

**381** respondents in total answered this question.



#### ASB (381 responses)

**60%** of all respondents thought that ASB was a fairly big or very big problem as opposed to **35%** who thought it was not a very big problem or not a problem at all.

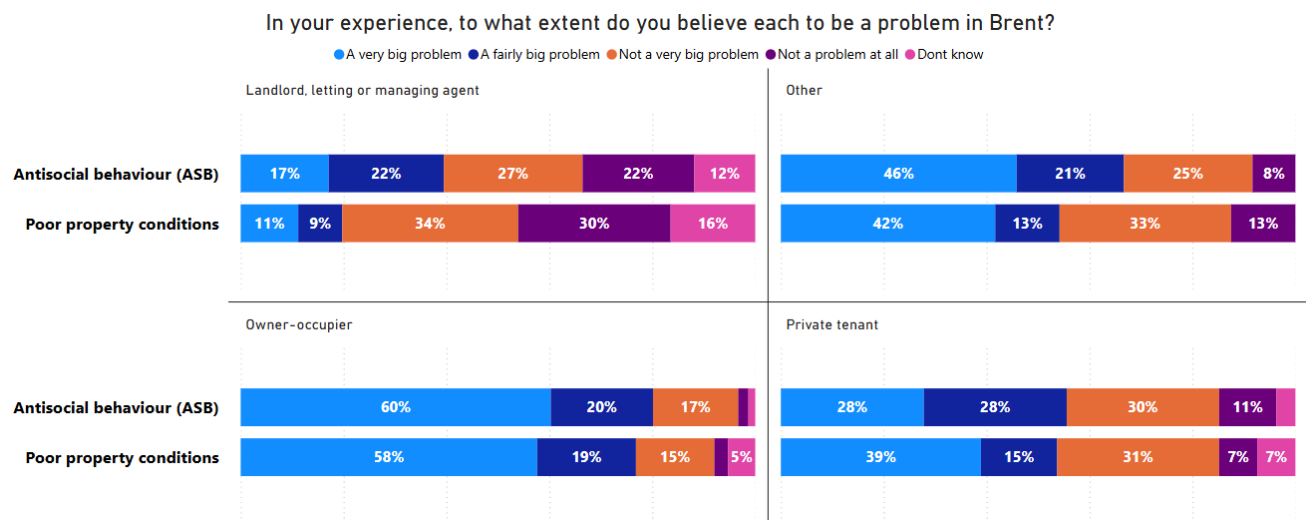
When looking at the responses by stakeholder group, as can be seen in the graphs below, there is great polarity between landlords, letting and managing agents and all other stakeholders; where **49%** of landlords, letting and managing agents viewed ASB as not a very big problem or not a problem at all, **80%** of owner-occupiers, **67%** of 'Other' stakeholders and **56%** of private tenants viewed ASB as a fairly big or very big problem.

#### Poor property conditions (381 responses)

The largest proportion of respondents, **49%**, stated that they believed poor property conditions were a very big or fairly big problem. **41%** believed they were not a very big problem or not a problem at all.

Similar to respondents' views on ASB relating to the borough's PRS, there is also polarity between landlords, letting and managing agents and the other stakeholder groups when considering poor property conditions; where only **20%** of landlords, letting and managing agents viewed poor property conditions as a fairly big or very big problem, in contrast, **54%** of private tenants, **55%** of

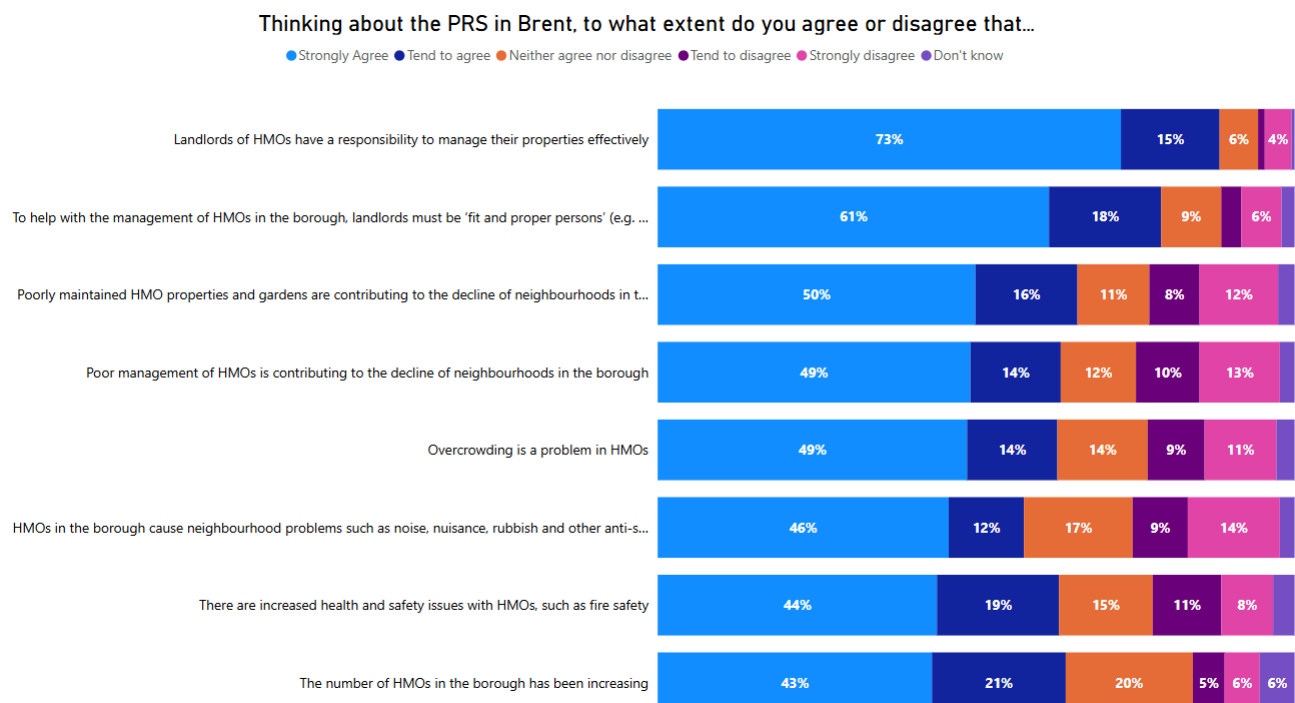
'Other' stakeholders and **77%** of owner-occupiers viewed poor property conditions as a fairly big or very big problem.



### 3.10 Views on the PRS in Brent

Respondents were also asked about their views on the PRS in Brent as a whole.

**381** respondents in total answered this series of questions.



#### Landlord responsibility (381 responses)

When asked if landlords of HMOs have a responsibility to manage their properties effectively, the overwhelming majority of respondents, **88%**, either agreed or strongly agreed.

### 'Fit and proper' person (381 responses)

When asked if landlords of HMOs should be 'fit and proper' persons (e.g. have proper management or financial arrangements in place and not have convictions for certain types of offences), again, an overwhelming majority, **79%**, either agreed or strongly agreed.

### Poorly maintained properties (381 responses)

When asked whether poorly maintained HMO properties were contributing to the decline of some areas in Brent, a majority of respondents, **66%** agreed or strongly agreed.

### Poorly managed properties (381 responses)

When asked whether poor management of HMO properties was contributing to the decline of some areas in Brent, a majority of respondents, **63%** agreed or strongly agreed.

### Overcrowding (381 responses)

When asked whether there was an issue with overcrowding in HMO properties in the borough, a majority of respondents, **63%** agreed or strongly agreed.

### Neighbourhood problems such as noise, nuisance, rubbish and other ASB (381 responses)

When asked whether HMO properties cause neighbourhood problems, a majority, **58%**, agreed or strongly agreed.

### Health and Safety Issues (381 responses)

When asked whether there were increased health and safety issues with HMO properties in the borough, a majority of respondents, **63%** agreed or strongly agreed.

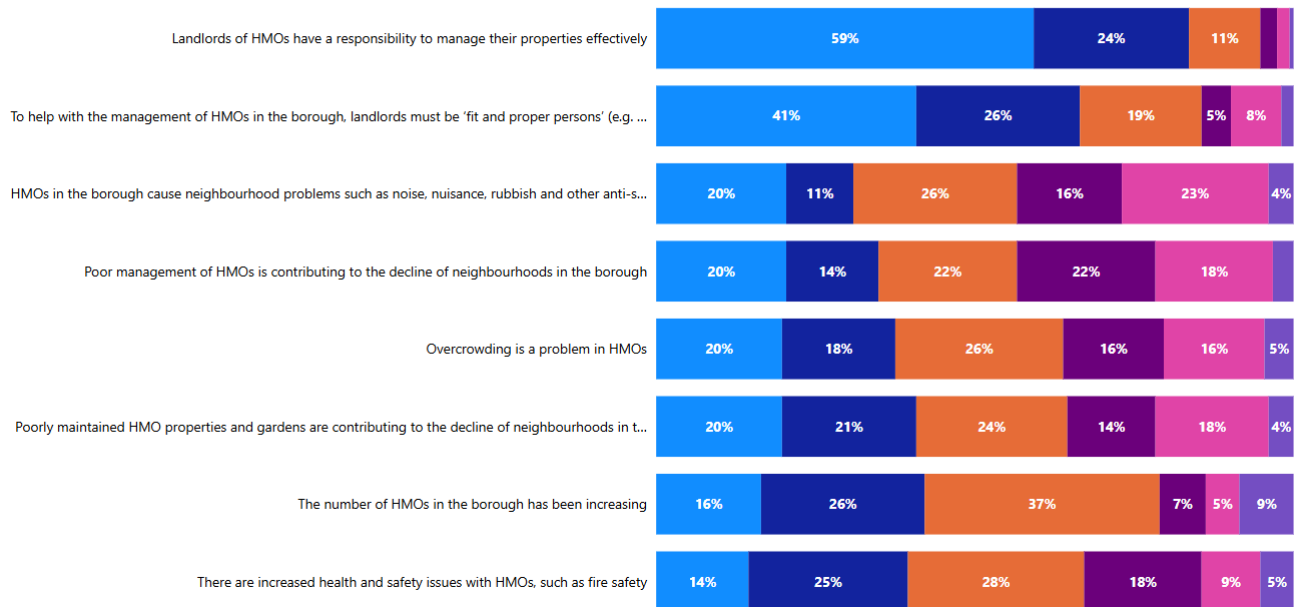
### The number of PRS properties (381 responses)

When asked whether the number of private rented properties in the borough has been increasing, a majority of respondents, **64%** agreed or strongly agreed.

Similarly, when looking at responses by stakeholder group, there is a contrast between landlords, letting and managing agents' perceptions of HMO properties in Brent and that of the other three stakeholder groups. The stakeholder breakdown is shown in the graphs below.

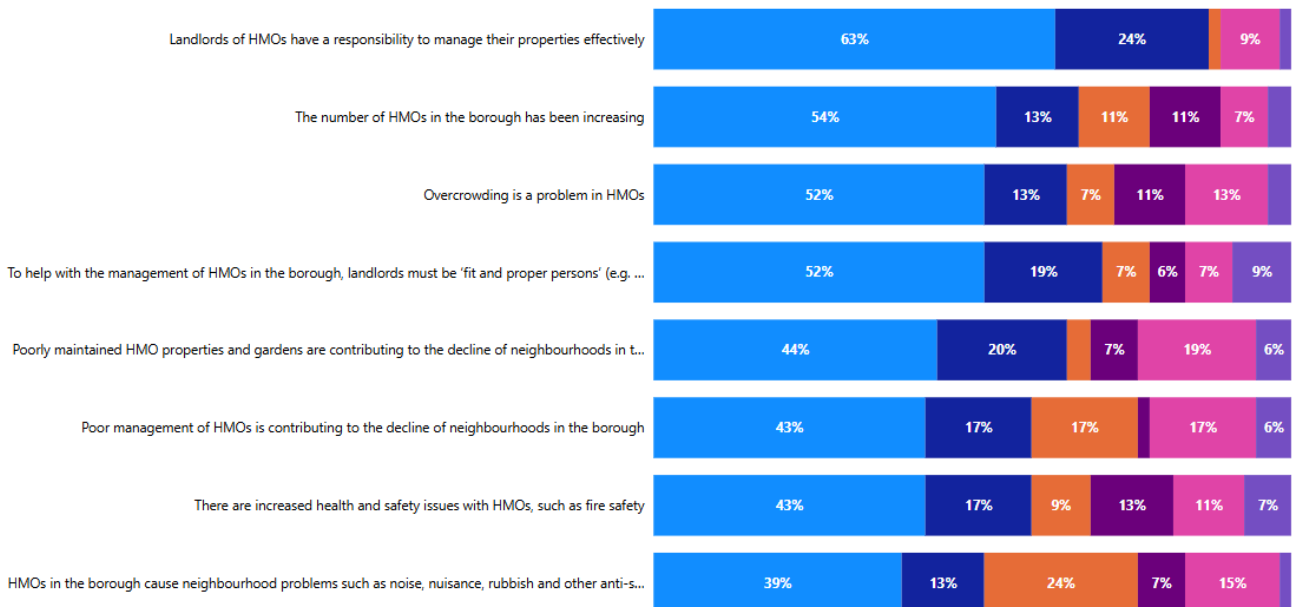
### As a landlord, letting or managing agent, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



### As a private tenant, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



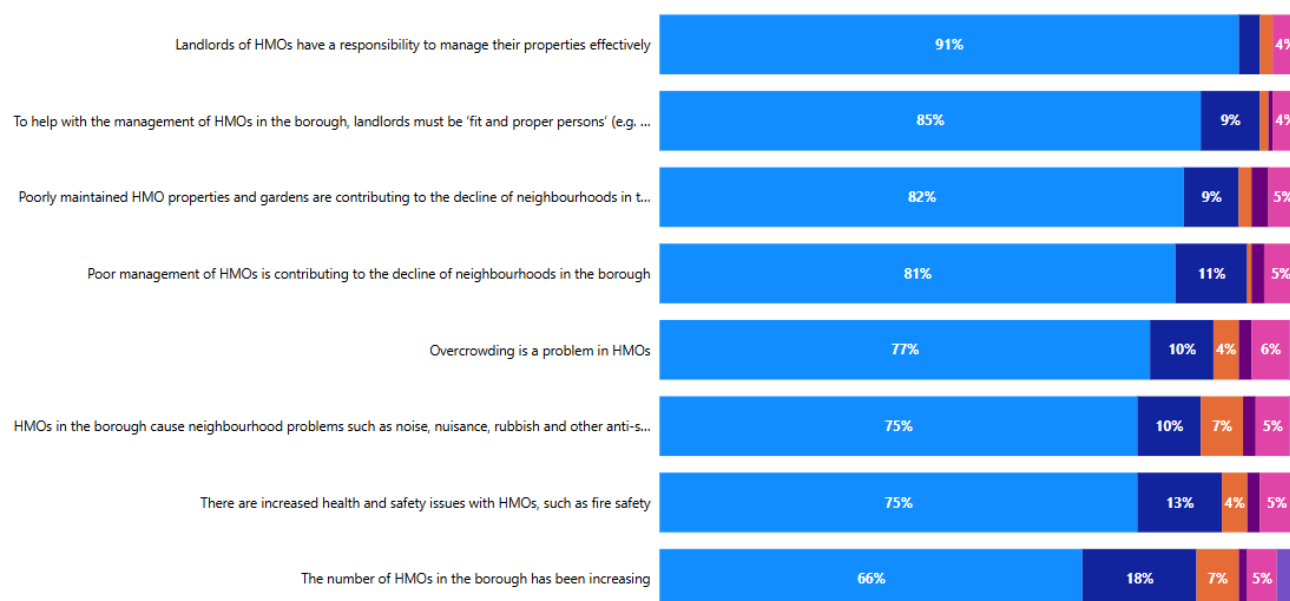
### As another type of stakeholder, to what extent do you agree/disagree with the following?

● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



### As an owner-occupier, to what extent do you agree/disagree with the following?

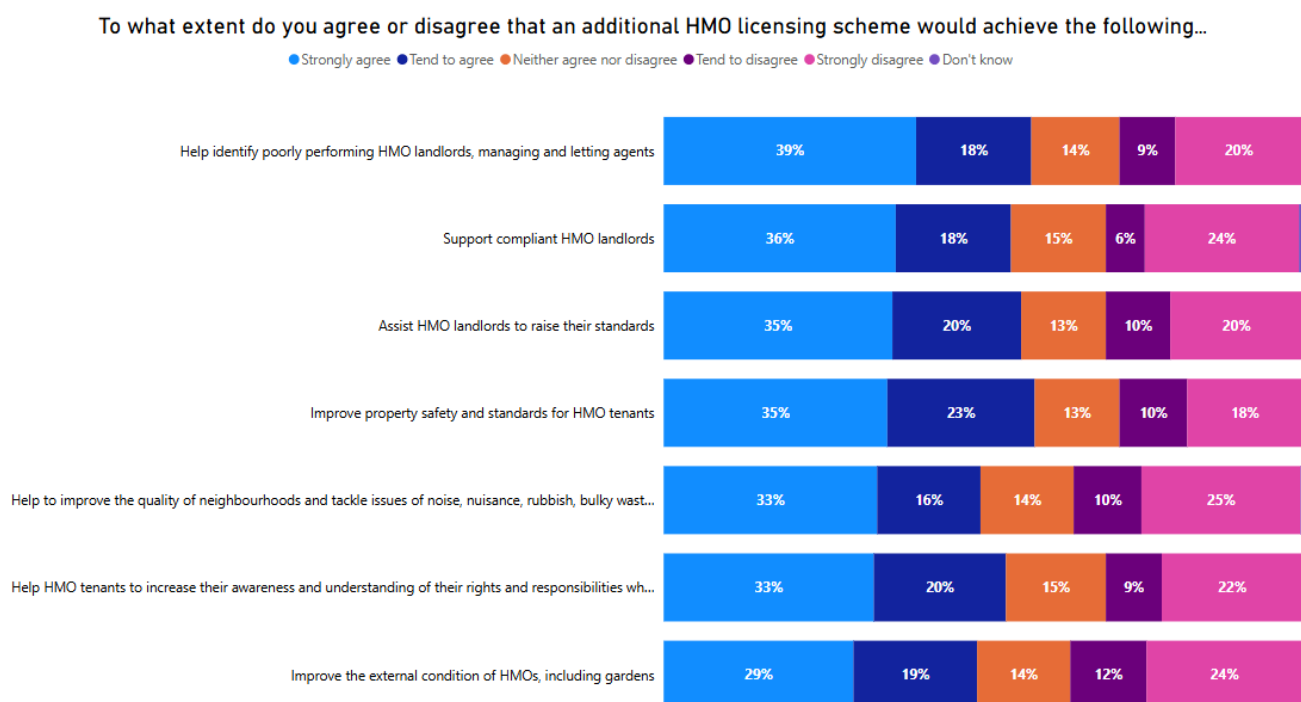
● Strongly Agree ● Tend to agree ● Neither agree nor disagree ● Tend to disagree ● Strongly disagree ● Don't know



### 3.11 Views on additional HMO licensing scheme outcomes in Brent

Respondents were also asked about their views on whether they thought an additional HMO licensing scheme in Brent would help to achieve certain outcomes.

**381** respondents in total answered this question.



The questions asked to what extent they agreed that an additional HMO licensing scheme in Brent would help to achieve the following outcomes:

**Help identify poorly performing HMO landlords, managing agents and letting agents (381 responses)**

**57%** of respondents agreed or strongly agreed, while **29%** disagreed or strongly disagreed.

**Support compliant HMO landlords (381 responses)**

**54%** of respondents either agreed or strongly agreed, while **30%** said they disagreed or strongly disagreed.

**Assist HMO landlords to raise their management standards (381 responses)**

**55%** of respondents either agreed or strongly agreed, while **30%** said they disagreed or strongly disagreed.

**Improve property safety and standards for HMO tenants (381 responses)**

**58%** of respondents either agreed or strongly agreed, while **28%** said they disagreed or strongly disagreed.

**Help to tackle issues of neighbourhood problems such as noise nuisance, rubbish and other ASB (381 responses)**

**49%** of respondents either agreed or strongly agreed, while **35%** said they disagreed or strongly disagreed.

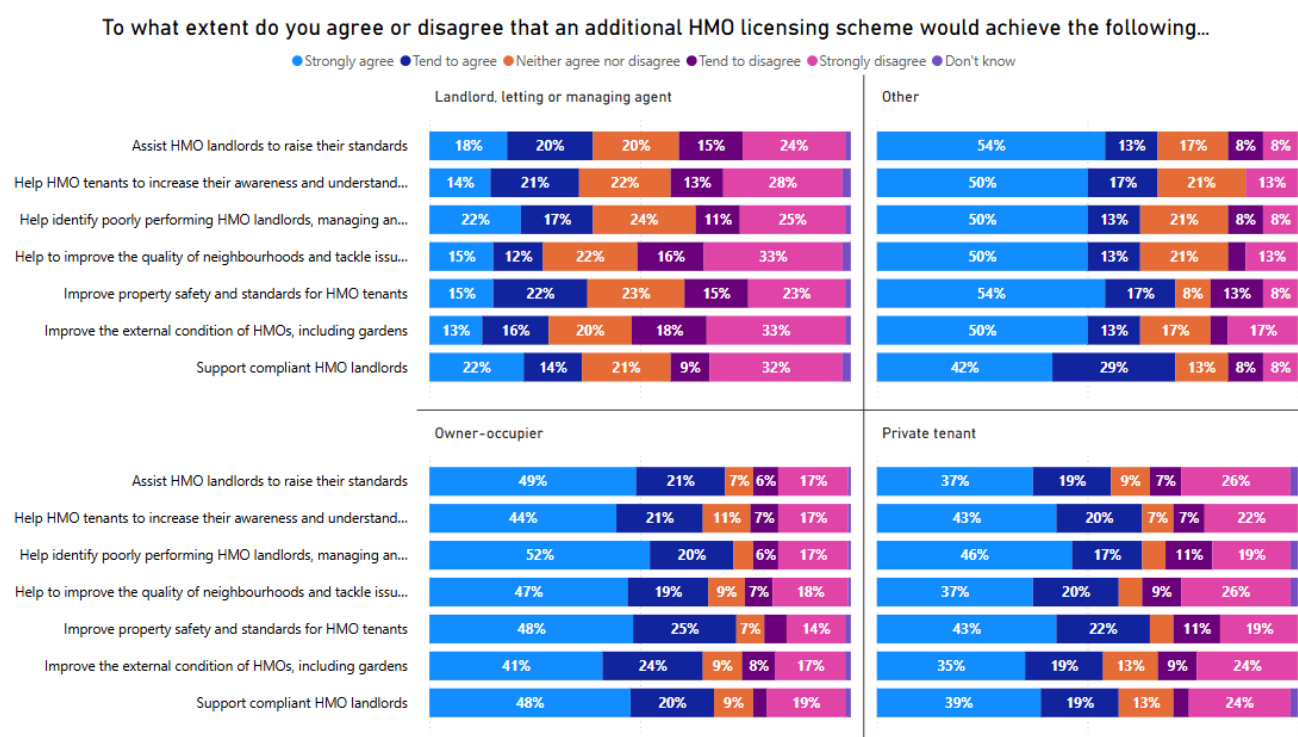
Help HMO tenants to increase their awareness and understanding of their rights and responsibilities when living in the PRS (381 responses)

**53%** of respondents either agreed or strongly agreed, while **31%** said they disagreed or strongly disagreed.

Improve the external condition of HMOs, including gardens (381 responses)

**48%** of respondents either agreed or strongly agreed, while **36%** said they disagreed or strongly disagreed.

As is the case with the majority of questions, there is polarity between the views of landlords, letting and managing agents and those of the other stakeholder groups. The stakeholder breakdown is shown in the graphs below.



### 3.12 Alternative solutions, other comments and considerations

Open text responses were also requested to gather additional comments, and to determine whether stakeholders felt that there was anything further that the council should consider:

Some respondents suggested alternative approaches to improving housing standards and ASB in HMO properties, such as focusing on better management and enforcement of existing regulations. They emphasised the need for a more balanced and targeted approach that does not penalise good



landlords or deter investment in the rental market. A major theme was that the council should focus on building new homes and helping to make renovations to existing properties easier.

1. Reduction in number of HMOs: many respondents expressed a negative view of HMOs overall and requested either a reduction in the number of HMOs in the borough or limits to the number of HMOs.

*'Ensure HMO's are not centred in specific areas (Harlesden being a bit of a dumping spot).'*

*'HMO's should be banned and has no place in society as new people coming and going is a safety and security risk for locals who have lived in the area for 40yrs like me.'*

*'We need to reduce the number of HMOs in the area and increase enforcement of the regulations, it is becoming a real issue for many residents.'*

2. Protection, education and support: there was a call for better support for both landlords tenants, including better communication of information regarding private rentals more targeted inspections and enforcement for the worst properties.

*'Regulate, Educate and provide financial support for struggling landlords and tenants.'*

*'Raising awareness amongst tenants (presumably by raising awareness amongst all residents - but perhaps particularly social housing tenants) about their rights to quality housing, including making it easier for them to make complaints without threat of eviction, and perhaps making it easy for them to have their homes inspected if they feel there's a problem.'*

*'make tenants aware of their rights to complain and the legal requirements of landlords such as fire assessments epc's gas safety etc these are all legal requirements set by the government NOT Brent'*

### **3.13 Views supporting the proposed additional HMO licensing scheme**

It is worth noting that, although there were a number of free text questions inviting written responses, these were only when respondents were in disagreement or had alternative ideas. While the majority of respondents expressed agreement with the proposed scheme, the free text comments these respondents left were primarily constructive ideas for improvements and additions to the proposed scheme. There were however many positive comments about the scheme. Some of these are listed below:

*'This is an excellent initiative - well done Brent. Irresponsible landlords need to be forced to fit and proper landlords.'*

*'this is such a huge area of focus - i'm really happy brent are addressing it. there needs to be further regulation'*

*'I am fully agree with HMO license it makes safe housing for teannat and some tax income for Brent'*

*'I think these proposals are sensible, however the problem will be with Brent Council's enforcement of them. The enforcement of waste management is non-existent and has been cut back in successive budget reduction rounds and the whole thing will fail. So you need to build in enforcement measures and funding and commitment to this for years and years to come to make this work and not fail.'*

## 4. Public meetings and written responses

Brent Council held two virtual public forums, an in-person Landlord Forum and four in-person drop-in sessions, to provide information about the proposed schemes and to gather feedback from stakeholders. Feedback was also gathered through formal written responses. Below is a summary of the key themes that came out of the forums and the written submissions.

Council officers also responded to email queries that were sent as part of the consultation.

### 4.1 Public online forums

The council, in conjunction with Cadence Innova, held two meetings aimed at engaging with landlords, agents and residents, to make them aware of the consultation and to gather their feedback. There was an online meeting (via Microsoft Teams) which was held on **30 April 2025** with **16** attendees (the actual number of attendees fluctuated during the meeting as attendees joined late or left early), and a further virtual event held on **21 May 2025**, with **38** attendees.

Council officers were present at every public forum. Following on from a presentation about the proposals, the majority of the meeting was used to undertake a question-and-answer session. Attendees had the opportunity to express their views and ask questions about the proposals. They were able to highlight areas requiring clarification and suggest matters for the council officers to consider. During each public forum, council officers attempted to address all questions posed by attendees, or directed them to the consultation documents for further information (often when there were specific questions about the proposed licence conditions, fees etc).

The main themes of the questions and views expressed were as follows, categorised by theme:

#### Financial Transparency and Public Accountability

*Does LLAS help the council financially?*

*Would it not help the wider public by publishing financial and objective achievements, maybe on the council website?*

#### Payment Flexibility & Engagement

*Has there been any thought given to the application fee payment method? For ongoing connection, a monthly DD similar to Council Tax would help both parties.*

#### Equity of Accredited Landlord Discount

*The £40 discount given to accredited LLAS members - what are your thoughts on extending this to landlords who are members of other larger associations such as NRLA?*

#### Oversight of Council and Housing Association Properties

*Properties not linked to the schemes are council and housing association properties, correct? Has there been any plan to improve these market?*

#### Other

*Does the council have any plan to reduce HMO properties?*

## 4.2 Written representations

During the consultation period, Brent Council received written responses and questions through its email inbox from various stakeholders including residents, landlords and landlord groups, including two written letters responding to the consultation from representative organisations. A summary of key themes and concerns is listed below, and the organisations' full submissions are included in Appendix 4.

Opposition to including all section 257 HMOs due to challenges in determining licensing requirements (*Safeagent*)

Fee structure needs to be simplified and renewal discounts extended to all landlords under the previous scheme (*Safeagent and Propertymark*)

Accreditation discounts eligibility to be increased and Safeagent included (*Safeagent*)

Proposed Licence Conditions need to be clear, practical, and non-exclusionary conditions (*Safeagent*)

The council should recognise the important role of letting agents and the new legislation with regards to protecting client money (*Safeagent*)

Recommendation to adopt a targeted licensing approach focusing resources on wards with higher numbers of poorly managed HMOs (*Safeagent and Propertymark*)

Preference for a regulatory framework (instead of the additional HMO licensing scheme) which seeks to educate rather than use punitive measures (*Propertymark*)

Concerns around cost effectiveness of the proposed scheme (*Propertymark*)

Concerns around impact of the fee on cost of living and supply of properties in the PRS (*Propertymark*)

### 4.3 Letter of support

During the consultation, Brent Council also received letters in support of the council's proposals to implement the additional HMO licensing scheme from the London Assembly Member for Brent and Harrow and also from Enfield Council, drawing on their current experience of implementing property licensing schemes. These letters can be found in Appendix 5.

## 5. Appendices

- Appendix 1 - Communications and Marketing visuals and analytics
- Appendix 2 – Survey respondent profile
- Appendix 3 – Survey questionnaire
- Appendix 4 – Full written representations
- Appendix 5 – Letters of support

## Appendix 1 - Communications and Marketing visuals and analytics

### Assets

#### HAVE YOUR SAY ON OUR PLANS TO LICENCE HMOS IN BRENT

It's all about driving up housing standards for renters.  
Let us know your views on regulating the private rented sector.

**Consultation ends on 10 June.** [www.haveyoursay.brent.gov.uk](http://www.haveyoursay.brent.gov.uk)



#### HAVE YOUR SAY ON OUR PLANS TO LICENCE HMOS IN BRENT

It's all about driving up housing standards for renters. Let us know your views on regulating the private rented sector.

**Consultation ends on 10 June.**



#### DRIVING UP STANDARDS FOR RENTERS

Have your say on plans to license Houses in Multiple Occupation (HMOs) in Brent.

**Consultation ends on 10 June.**

[www.haveyoursay.brent.gov.uk/](http://www.haveyoursay.brent.gov.uk/)



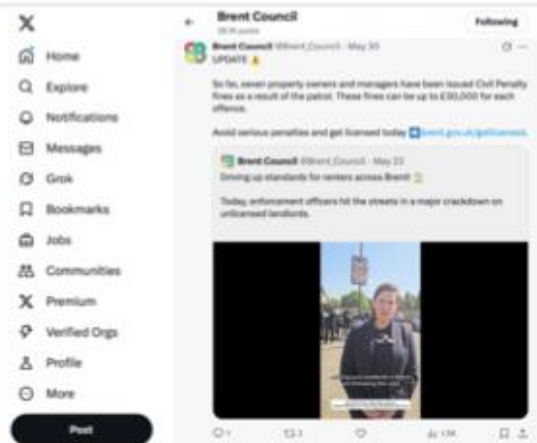
## Brent channels



Facebook



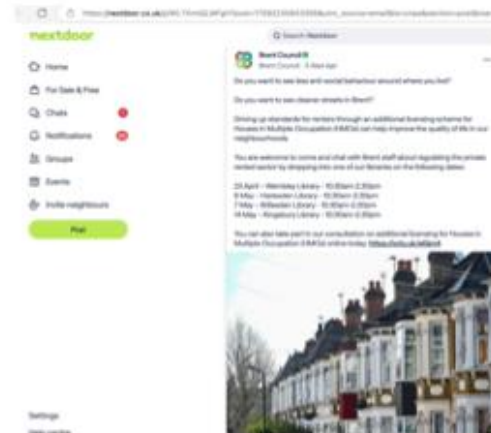
Instagram



X (formerly Twitter)



LinkedIn

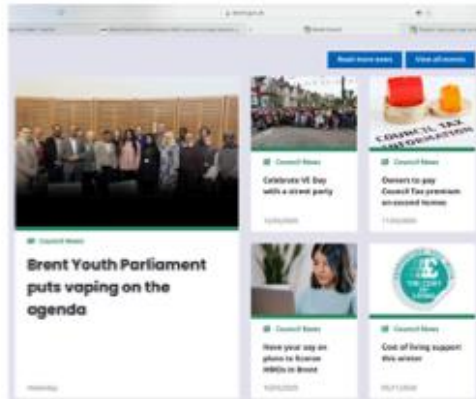


Nextdoor



# Brent channels

## Homepage



**Have your say on plans to license HMOs in Brent – consultation extended!**  
In February 2020, Brent Council introduced a borough-wide additional HMO licensing scheme to improve property conditions and management standards in smaller HMOs occupied by three or four people forming two or more households, sharing amenities. The licensing scheme ended on 31 January 2025.

We are contacting you to inform you of our proposals to introduce a further borough-wide additional HMO licensing scheme from autumn 2025.

We want to build on the work we have already achieved through the previous scheme, working with landlords and managing agents to improve property conditions and management standards in HMO properties, as well as taking a robust enforcement approach against those landlords who fail to comply and put their tenants and the wider community at risk. We believe that a further additional HMO licensing scheme will help us continue this work to make sure that all HMOs are safe and well managed.

Since additional HMO licensing was introduced, we have seen many positive improvements in the condition and management of HMOs. The council has inspected and granted more than 5,000 HMO licences.

We are committed to making sure that HMO properties are well-managed and safe for private renters, as well as creating a level playing field for landlords and letting agents in the borough.

**We are running a public consultation and want to hear your views on these proposals.** To ensure as many landlords and agents as possible have the opportunity to take part, the deadline has been extended to 18 June 2025.

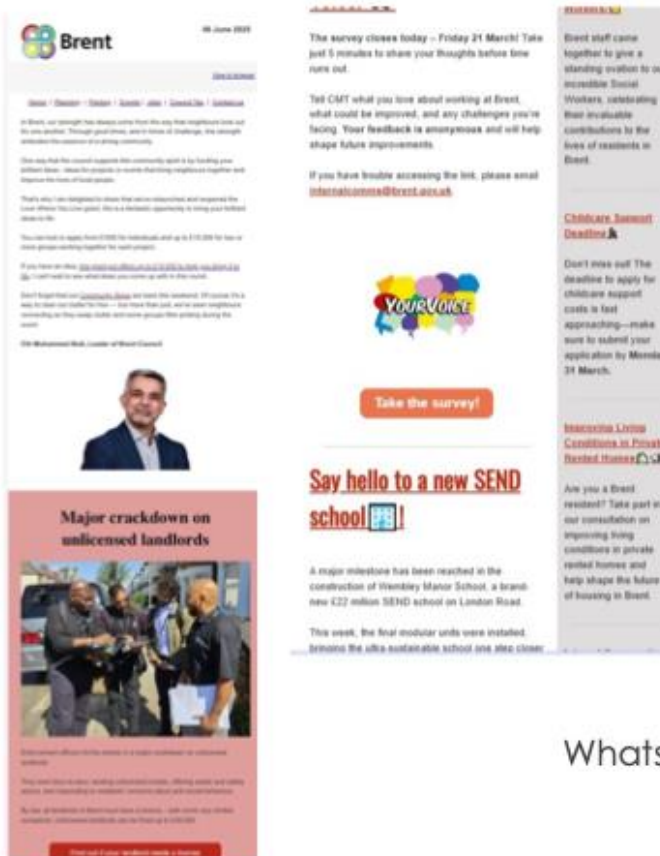
**Have your say today.**

You can also join one of our online information sessions, taking place on **Wednesday 30 April** and **Wednesday 21 May at 6.30pm**. Click the dates to reserve your place and find out more about the proposals.

We appreciate your contribution to providing safe and well-managed accommodation for our residents, and we look forward to receiving your feedback.

If you have any queries or require help in sharing your views with us, please email [hmoenquiries@brent.gov.uk](mailto:hmoenquiries@brent.gov.uk) or call 020 8507 2384/5.

## HMO newsletter



## Resident e-newsletter

## The Loop



## WhatsApp

## Out of home – neighbouring boroughs

346,553 impressions



14 sites



14 days



seven boroughs



## Online articles



Landlord Today



Harrow Online



The Negotiator



London Property Licensing



Property 118



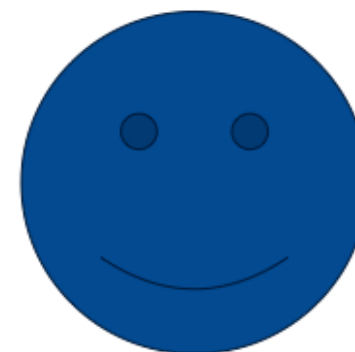
BBC

## Organic social media analytics

929 clicks



18 posts



82 likes



27,026 views

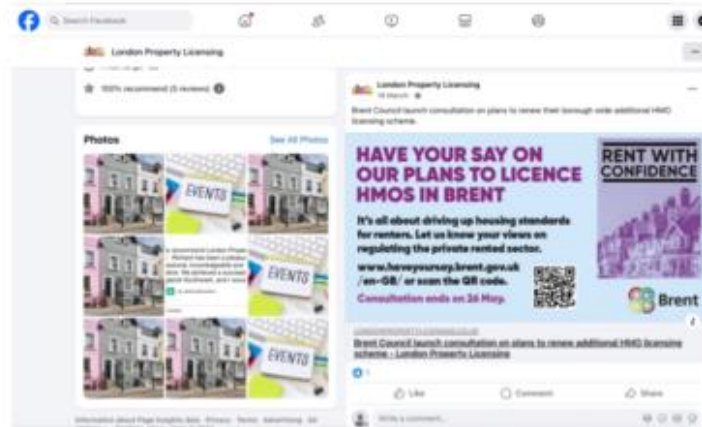
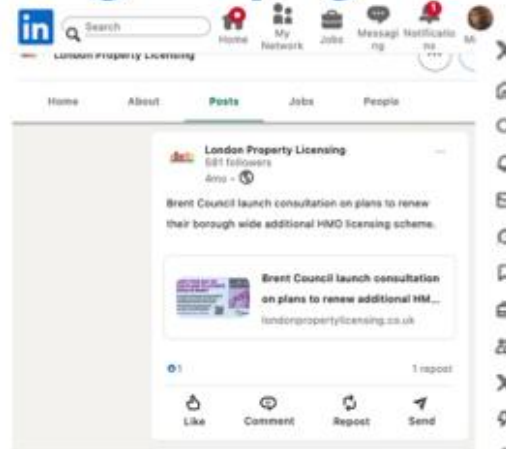


29 reposts



4,441 impressions

# London Property Licensing campaign

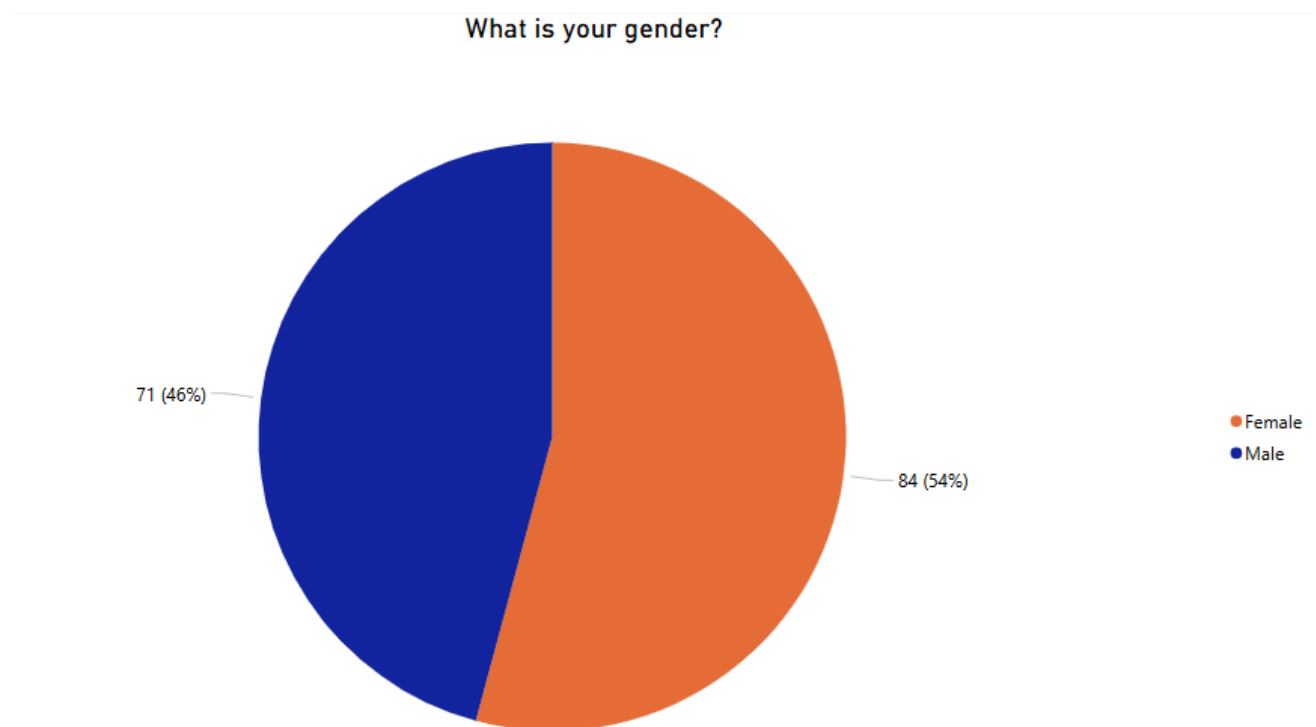


## Appendix 2 - Survey respondent profile

The respondents to the consultation survey were asked if they would give their age range, sex, ethnic background, religion, sexual orientation, gender identity and disability status. Their responses were compared with benchmarks for the borough using the 2021 census<sup>1</sup>. It is worth noting that for each of these equalities' questions, a certain proportion of respondents either did not respond or chose 'prefer not to say' as their response, therefore fully accurate comparisons with the compulsory census data cannot always be made. Where the census data includes a 'prefer not to say' option, such as sexual orientation, we have included this option as well. However, for other questions where the census does not have this option, such as gender and age, we have only included data for those who responded to the question.

### Gender

Of the **155** respondents who answered this question, **46%** said they were male and **54%** said they were female.

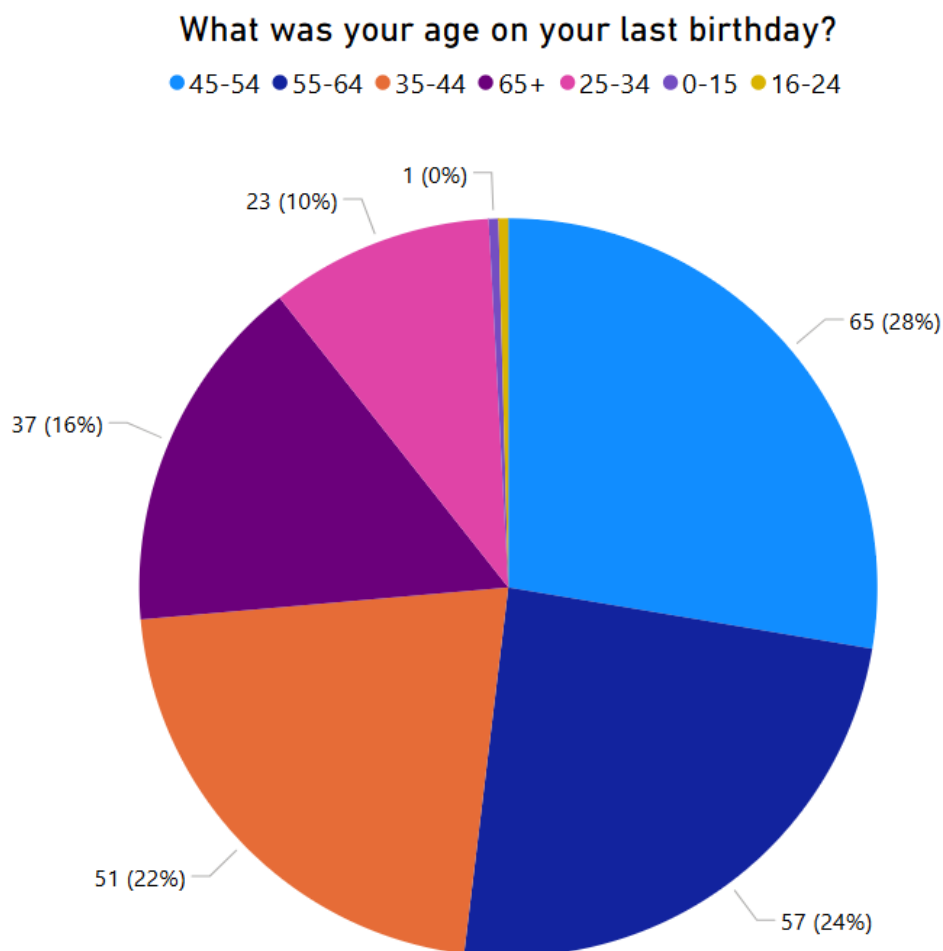


According to the 2021 Census, the population of Brent is **51%** female and **49%** male, meaning that, among those that chose to answer this question within the survey, women were slightly overrepresented.

---

<sup>1</sup> [Census - Office for National Statistics](#)

## Age



**235** respondents answered this question.

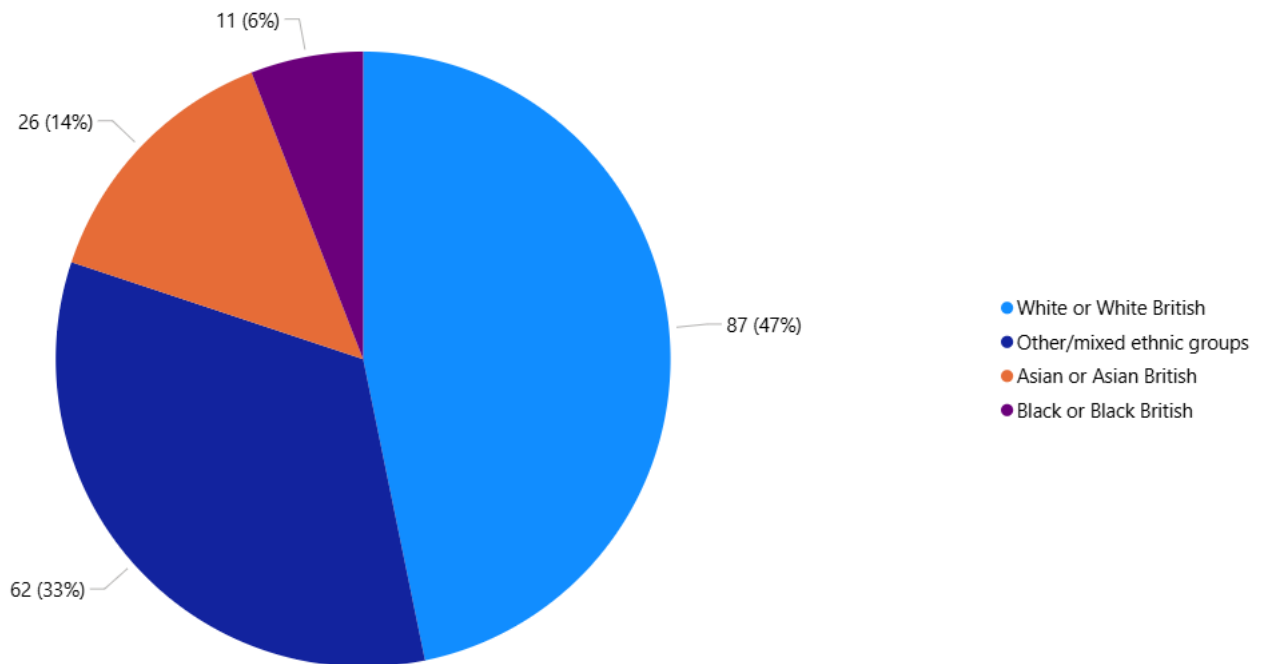
Age groups 45 to 54 years old (**65** responses) and 55 to 64 (**57** responses) were the most represented within the consultation and made up **28%** and **24%** of the total, respectively. The age group 35 to 44 (**51** responses) made up **22%**, 65+ (**37** responses) made up **16%**, 25 to 34 (**23** responses) made up **10%**, while 16 to 24 (**1**) and 15 and under (**1**) each made up **less than 1%**.

Compared to the Census data for the borough, the 45 to 54 (**28%** compared to the Census figure of **14%**), 55 to 64 (**24%** compared to **11%**), 35 to 44 (**22%** compared to **16%**), 65+ age groups (**16%** compared to **12%**) were all overrepresented. The 25 to 34 (**10%** compared to **17%**), 16 to 24 (**less than 1%** compared to **13%**) and 15 and under (**less than 1%** compared to **18%**) were all underrepresented.

## Ethnic origin

Respondents were asked 'What is your ethnicity?'. **186** respondents chose to answer this question with their race or ethnicity.

### What is your ethnicity?



The 2021 Census results for Brent regarding ethnic groups are shown below:

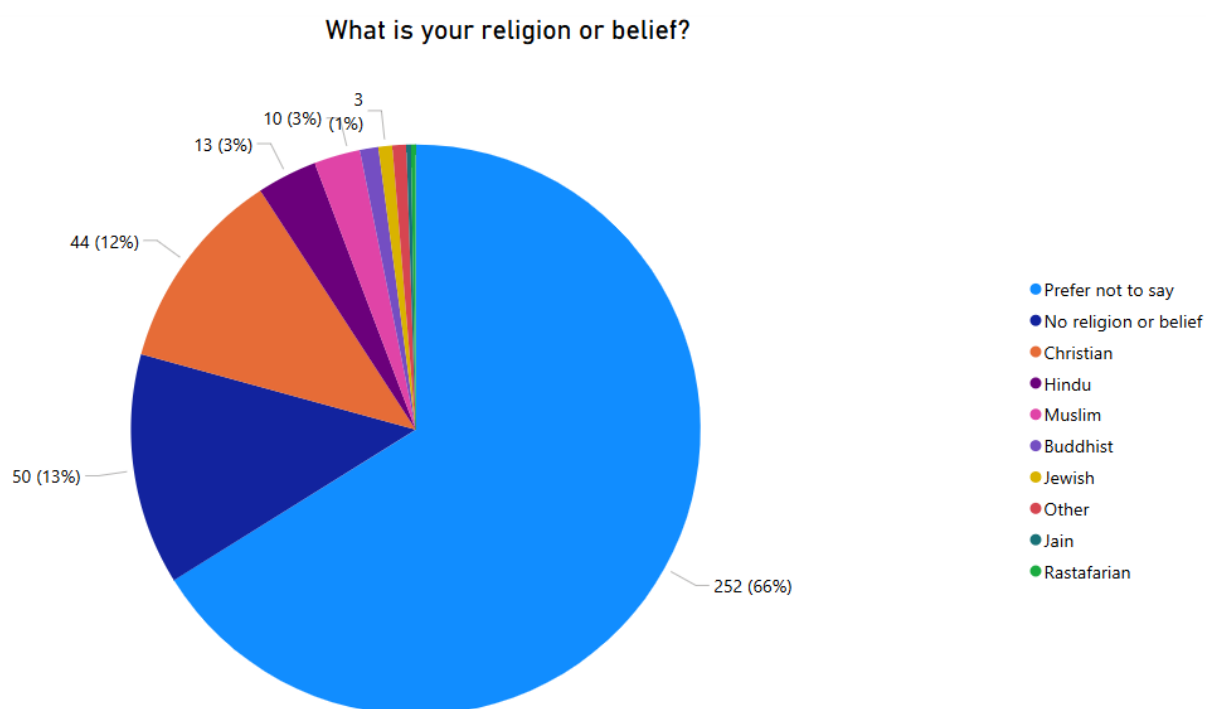
| Ethnic Group                 | Percentage (2021 Census) |
|------------------------------|--------------------------|
| White or White British       | 34.6                     |
| Asian or Asian British       | 32.8                     |
| Black or Black British       | 17.5                     |
| Other or Mixed ethnic groups | 15                       |

Of the respondents who chose to answer this question, the largest ethnic group was White or White British, who made up **47%** of respondents. This is higher than the borough's Census figure of **34.6%**. This was followed by Other/mixed ethnic groups, making up **33%** of respondents which is above the Census figure of **15%**. Asian or Asian British respondents made up **14%**, compared to the Census figure of **32.8%** and Black or Black British respondents were **6%**, compared to the Census figure of **17.5%**. Therefore both Asian or Asian British and Black or Black British respondents were underrepresented.

It should however be noted that, along with many of the other equalities questions, a majority of respondents (**51%**) chose not to share their ethnicity, so definitive conclusions about representation cannot be made.

## Religion and beliefs

Respondents were asked their religion or beliefs. **129** respondents chose to answer this question. Aside from the **66% (252)** who responded 'prefer not to say' (the largest proportion), **13% (50)** responded 'No religion or belief' followed by **12% (44)** responding Christian.



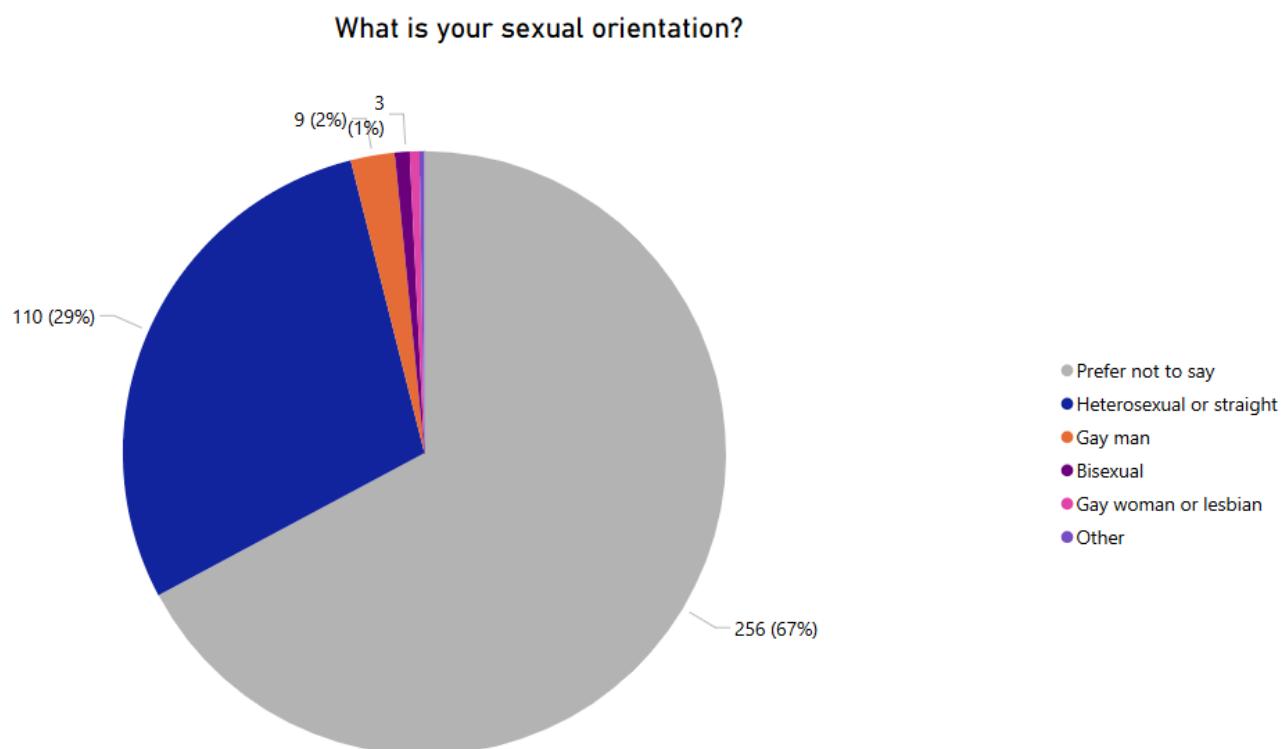
The 2021 Census results for Brent regarding religion or beliefs are shown below.

| Religion or beliefs | Percentage<br>(2021 Census) |
|---------------------|-----------------------------|
| Christian           | 38.8                        |
| Muslim              | 21.4                        |
| Hindu               | 15.6                        |
| No religion         | 13.6                        |
| Not stated          | 6.9                         |
| Jewish              | 1.1                         |
| Buddhist            | 0.9                         |
| Jain                | 0.7                         |
| Sikh                | 0.5                         |
| Other               | 0.6                         |

Due to the high proportion of respondents who chose not to respond to this question, accurate comparisons to the borough figures cannot be made.

## Sexual orientation

Respondents were also asked their sexual orientation. **125** respondents chose to answer this question. The largest proportion of responses were from people who identified as straight/heterosexual (**64%**). A large proportion of respondents, **27%**, gave the response 'prefer not to say'.



The 2021 Census results for Brent regarding sexual orientation are below.

| Sexual orientation              | Brent Census 2021 Percentage |
|---------------------------------|------------------------------|
| <b>Straight or Heterosexual</b> | 85.1                         |
| <b>Not answered</b>             | 11.7                         |
| <b>Gay or Lesbian</b>           | 1.3                          |
| <b>Bisexual</b>                 | 1.3                          |
| <b>Pansexual</b>                | 0.5                          |
| <b>Other</b>                    | 0.1                          |

The straight/heterosexual population are underrepresented by the consultation responses (**29%** compared to **85.1%** according to 2021 Census). The gay or lesbian and bisexual populations were slightly overrepresented (**3.6%** versus **2.6% in the Census**). Given the large proportion of respondents to this question who chose not to respond to the question (**67%**), these representations cannot be assumed to be comparable to the wider borough.

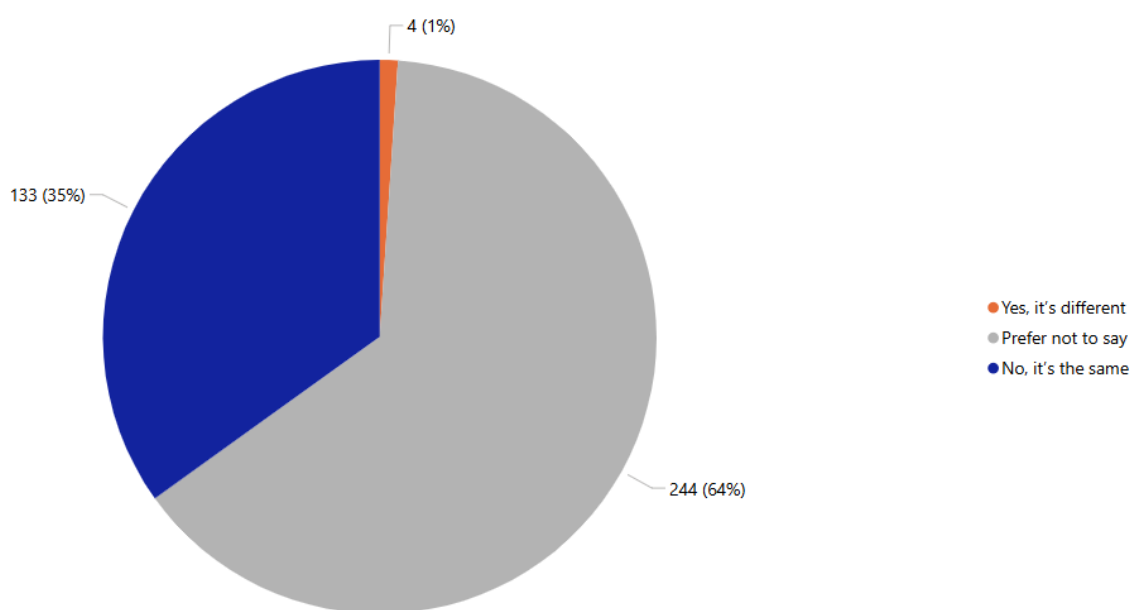


## Gender identity

Respondents were also asked whether their gender identity is different to the sex they were assumed to be at birth.

**137** respondents chose to answer this question. The largest proportion of responses were from people who opted not to say (**64%**). The largest proportion (**35%**) of other respondents said their gender identity was the same as the sex they were assumed to be at birth while a minority (**1%**) said their gender identity was different.

Is your gender identity different to the sex you were assumed to be at birth?



The 2021 census has **1.3%** of Brent residents saying their gender identity is different to their sex registered at birth, however 10.1% of the borough population did not answer that question in the Census therefore the actual proportion of people identifying as transgender may be higher.<sup>2</sup>

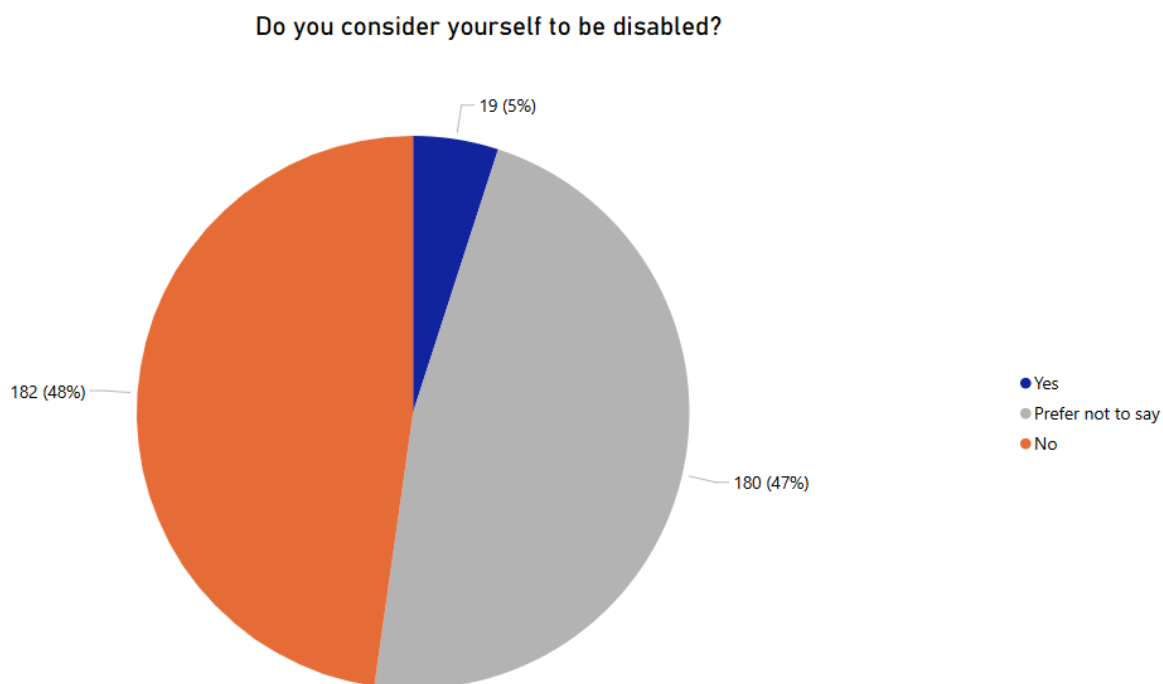
*Gender Identity estimates from Census 2021 are official statistics in development. This reflects their innovative nature and the evolving understanding of measuring gender identity, along with the uncertainty associated with these estimates<sup>3</sup>.*

<sup>2</sup> [LGBTQ+ population in Brent - 2021 Census topic report - revised](#)

<sup>3</sup> [Sexual orientation and gender identity quality information for Census 2021 - Office for National Statistics \(ons.gov.uk\)](#)

## Disability or long-term health condition

Respondents were also asked if they considered themselves to have a disability. **201** respondents chose to answer this question.



A large proportion (**47%**) did not choose to answer this question.

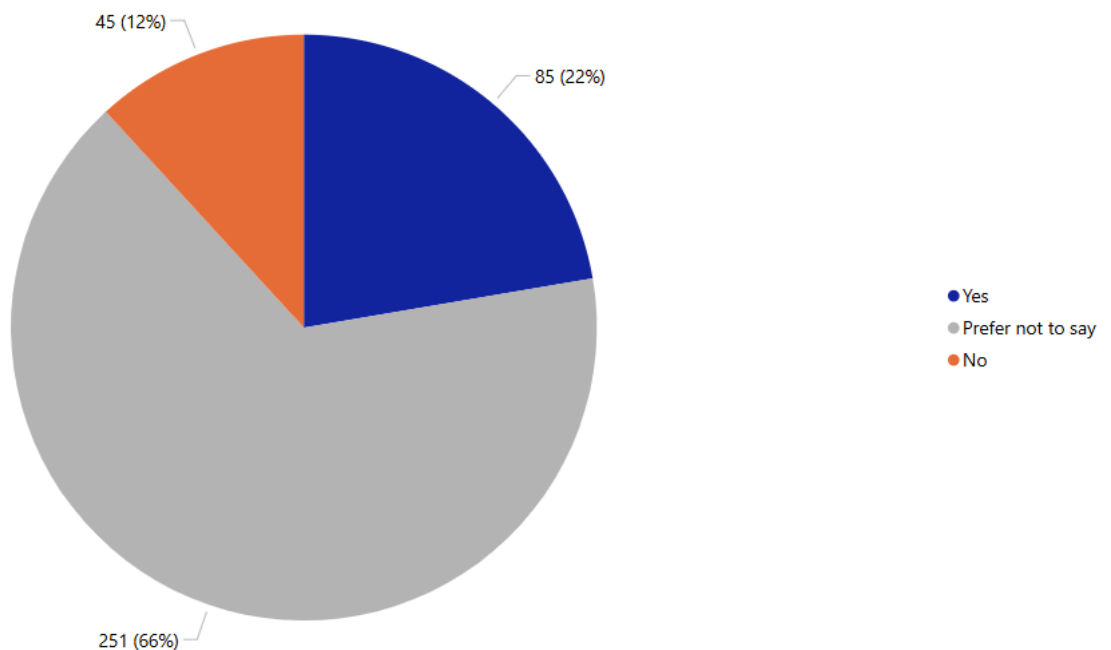
Of those who chose to answer this question, **91%** said they were not disabled while **9%** said they were disabled. The 2021 Census figures for the borough are **85.3%** not disabled and **14.7%** disabled (either 'limited a lot' or 'limited a little'), meaning the disabled population was slightly underrepresented within the survey responses<sup>4</sup>.

## Marital Status

Respondents were asked if they were married or in a civil partnership. **130** respondents chose to answer this question.

<sup>4</sup> [How life has changed in Brent: Census 2021](#)

### Are you married or in a civil partnership?



Of those who answered this question, **65%** stated they were married or in a civil partnership while **35%** stated they were not.

| Marital Status                                   | Percentage (2021 Census) |
|--|--------------------------|
| Married or in a registered civil partnership     | 46.9                     |
| Not married or in a registered civil partnership | 53.1                     |

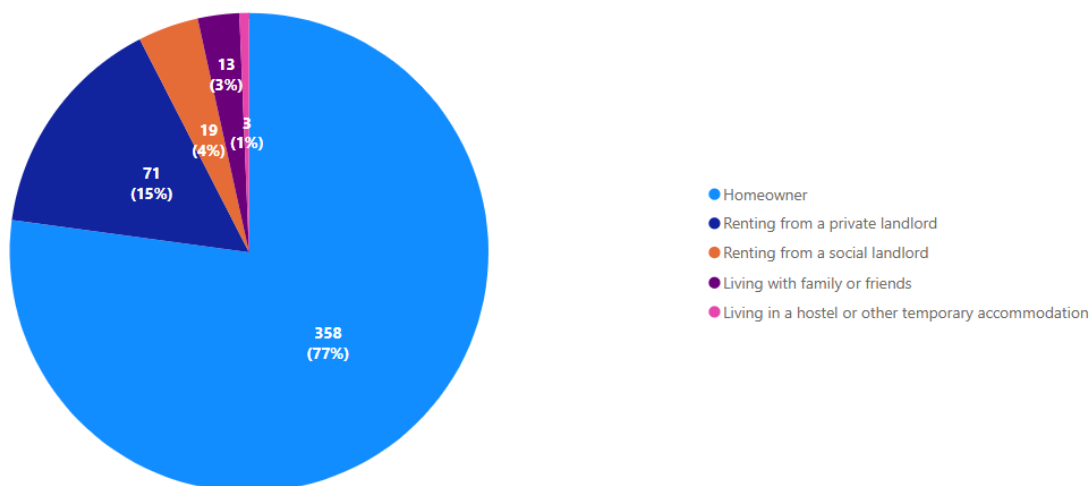
Compared to the Census data, respondents who were married or in a civil partnership were overrepresented (**65%** versus **46.9%** in the Census) and those who were not were underrepresented (**35%** versus **53.1%**).<sup>5</sup>

### Accommodation

Respondents were asked if they rent or own their own accommodation with options on their living situation. **464** respondents chose to answer this question.

<sup>5</sup> [Marriage and civil partnership status in England and Wales - Office for National Statistics](#)

### Do you rent or own your accommodation?



A large majority of respondents who responded to this question were homeowners (**77%**). **15%** stated they were renting from a private landlord and **4%** from a social landlord.

| Housing Tenure                           | Percentage (2021 Census) |
|--|--------------------------|
| Owns outright or with a mortgage or loan | 27.4                     |
| Shared Ownership                         | 0.7                      |
| Socially rented                          | 28.3                     |
| Private rented                           | 43.4                     |
| Lives rent free                          | 0.3                      |

Homeowners were significantly overrepresented (**77%** versus **27.4%**) whereas private rented and socially rented tenures were both significantly underrepresented, **15%** versus **43.4%** and **4%** versus **28.3%** respectively.

## Appendix 3 - Survey questionnaire

### **Have your say on additional HMO licensing in Brent**

Additional HMO Licensing  
consultation questionnaire



## YOUR PRIVACY

All the information you provide will be treated in strict confidence, will only be used for the purposes of this consultation and will only be shared with Cadence Innova who have been appointed by the council as consultants on this project.

Following the consultation a public report will be produced in which feedback from individual members of the public will be anonymous, but views from organisations may be attributed in full.

You can read the council's Privacy Notice here: [Privacy Policy | Brent Council](#)

## YOUR CONNECTION TO THE LONDON BOROUGH OF BRENT

---

In what capacity are you responding to this questionnaire?

PLEASE TICK ✓ ONLY ONE BOX THAT APPLIES TO YOU

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | <b>As a Brent resident, including a Brent tenant, or a local business in Brent (but not a landlord)</b> – please answer the grey shaded question overleaf, then go to the 'Local Issues?' section |
| <input type="checkbox"/> | <b>As a landlord, letting or managing agent with properties in Brent</b> – please answer the blue section overleaf, then go to the 'Local Issues?' section  |
| <input type="checkbox"/> | <b>As another type of stakeholder</b> – please answer the pink shaded section overleaf, and following questions   |

Please provide the following information about yourself (where relevant) so that we can monitor the representativeness of the responses and identify trends. We will take all feedback into account, regardless of whether you provide your personal details.

## INFORMATION ABOUT YOU: BRENT RESIDENTS & BUSINESSES

---

If you are a [resident living in Brent](#), or [responding on behalf of a local business in Brent](#), which of the following [best](#) describes you? PLEASE TICK ✓ ONE BOX ONLY

|                          |   |
|--------------------------|---|
| <input type="checkbox"/> | Private tenant living in a House in Multiple Occupation (HMO) or bedsit where you share some basic amenities (e.g. toilet, bathroom, kitchen) with others |
| <input type="checkbox"/> | Private tenant living in a single-family dwelling (e.g. a self-contained flat or house)   |
| <input type="checkbox"/> | Brent Council tenant  |
| <input type="checkbox"/> | Housing Association tenant  |
| <input type="checkbox"/> | Own my own home/currently paying a mortgage on my own home  |
| <input type="checkbox"/> | Shared owner – with a share in the equity of the home   |
| <input type="checkbox"/> | Local business in Brent (but not a landlord)  |
| <input type="checkbox"/> | Other<br><input type="text"/>   |

## INFORMATION ABOUT YOU: LANDLORDS AND AGENTS

If you are a landlord or agent with properties in Brent, which of the following best describes you? PLEASE

TICK ✓ ONE BOX ONLY

|  |  |
|--|--|
| <input type="checkbox"/> Landlord who manages their own property       | <input type="checkbox"/> Managing agent                |
| <input type="checkbox"/> Landlord who uses a managing or letting agent | <input type="checkbox"/> Registered social landlord    |
| <input type="checkbox"/> Letting agent                                 | <input type="checkbox"/> Other<br><input type="text"/> |

Do you live in the borough?

|                              |                             |
|------------------------------|-----------------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No |
|------------------------------|-----------------------------|

Please indicate how many properties you own/manage in the borough, for each of the following types.

PLEASE TICK ✓ ONE BOX FOR EACH TYPE OF PROPERTY

|   | 0                        | 1                        | 2-10                     | 11-50                    | 51-100                   | 101+                     |
|---|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| House in Multiple Occupation (3 or 4 people)    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Self-contained flat converted                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Self-contained flat purpose built               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| House in Multiple Occupation (5 or more people) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Single family occupancy house/bungalow          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Are you accredited or a member of any of the following? If yes, PLEASE TICK ✓ ALL THAT APPLY

|  |   |
|--|---|
| <input type="checkbox"/> National Residential Landlords Association (NRLA) | <input type="checkbox"/> ARLA Propertymark  |
| <input type="checkbox"/> London Landlord Accreditation Scheme (LLAS)       | <input type="checkbox"/> Royal Institution of Chartered Surveyors (RICS)                  |
| <input type="checkbox"/> UK Association of Letting Agents (UKALA)          | <input type="checkbox"/> Other landlord/letting agent association<br><input type="text"/> |
| <input type="checkbox"/> Safeagent   | <input type="checkbox"/> No   |



## INFORMATION ABOUT YOU: ORGANISATIONS AND OTHER STAKEHOLDERS

---

If you are responding on behalf of an organisation, which organisation do you represent?

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

*Please give us the name of the organisation and any specific group or department. Please also tell us who the organisation represents, what area it covers and how you gathered the views of members.*

If you are another stakeholder (e.g. with links to a neighbouring borough), please use the box below to provide full details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

## LOCAL ISSUES

To what extent do you believe each of the following to be a problem in your local area?

PLEASE TICK ✓ ONE BOX IN EACH ROW

|                            | Not a problem at all     | Not a very big problem   | A fairly big problem     | A very big problem       | Don't know               |
|----------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Poor property conditions   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Antisocial behaviour (ASB) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## ADDITIONAL HMO LICENSING SCHEME

Many people live in houses in multiple occupation (HMOs), which are properties that are shared by three or more unrelated people who form more than one household, and share toilet, washing or cooking facilities. HMOs can provide affordable and flexible accommodation, but they can also pose risks to health, safety, and wellbeing if they are poorly managed or maintained.

The council has a duty and a power to regulate HMOs through licensing schemes, which aim to ensure that HMOs meet certain standards and do not cause problems for tenants or neighbours.

Brent Council, like all other councils across the country, must operate a mandatory licensing scheme for larger HMOs. In 2015, Brent introduced a boroughwide additional HMO licensing scheme that applies to smaller HMOs that are occupied by three or four unrelated people. The scheme was renewed in February 2020 and ended on 31 January 2025.

We want to continue to improve the quality and safety of HMOs in the borough and so we are consulting on our proposal to introduce a further boroughwide additional HMO licensing scheme in Autumn 2025. Implementing an additional HMO licensing scheme will enable the council to further tackle issues such as poor conditions and the antisocial behaviour that is sometimes associated with HMO properties.

Brent Council proposes to introduce a boroughwide additional licensing scheme that will require all landlords to have a licence to let an HMO and meet certain property and management conditions. The council is allowed to set fees for licence applications that take account of its costs in administering and carrying out the licensing functions, such as covering the costs of processing a licence application, inspecting and monitoring compliance with licence conditions and enforcing the scheme. You can read more about the proposed scheme in the consultation Evidence Pack.

**Thinking about the HMO tenure in Brent, to what extent do you agree or disagree with the following statements? PLEASE TICK ✓ ONE BOX FOR EACH STATEMENT**

|   | Strongly agree           | Tend to agree            | Neither agree nor disagree | Tend to disagree         | Strongly disagree        | Don't know               |
|---|--------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|
| The number of HMOs in the borough has been increasing   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| There are increased health and safety issues with HMOs, such as fire safety   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Overcrowding is a problem in HMOs   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| HMOs in the borough cause neighbourhood problems such as noise, nuisance, rubbish and other antisocial behaviour  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Poorly maintained HMO properties and gardens are contributing to the decline of neighbourhoods in the borough   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Poor management of HMOs is contributing to the decline of neighbourhoods in the borough   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Landlords of HMOs have a responsibility to manage their properties effectively  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| To help with the management of HMOs in the borough, landlords must be 'fit and proper persons' (e.g. have proper management or financial arrangements in place, and not have convictions for certain types of offences) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**To what extent do you agree or disagree with the proposal for a boroughwide additional HMO licensing scheme in Brent?** PLEASE TICK ✓ ONE BOX ONLY

|  |   |  |  |   |  |
|--|---|--|--|---|--|
| Strongly agree<br><input type="checkbox"/> | Tend to agree<br><input type="checkbox"/> | Neither agree nor disagree<br><input type="checkbox"/> | Tend to disagree<br><input type="checkbox"/> | Strongly disagree<br><input type="checkbox"/> | Don't know<br><input type="checkbox"/> |
|--|---|--|--|---|--|

**If you disagree with the proposals for an additional HMO licensing scheme, please explain why**

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

**What alternatives do you think should be considered to address the problems?**

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

**To what extent do you agree or disagree that an additional HMO licensing scheme will help to achieve the following outcomes? PLEASE TICK ✓ ONE BOX FOR EACH STATEMENT**

|  | Strongly agree           | Tend to agree            | Neither agree nor disagree | Tend to disagree         | Strongly disagree        | Don't know               |
|--|--------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|
| Improve the external condition of HMOs, including gardens  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Improve property safety and standards for HMO tenants  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Help to improve the quality of neighbourhoods and tackle issues of noise, nuisance, rubbish, bulky waste, fly-tipping and other antisocial behaviour | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Help HMO tenants to increase their awareness and understanding of their rights and responsibilities when living in the PRS                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Help identify poorly performing HMO landlords, managing and letting agents   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Assist HMO landlords to raise their standards  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Support compliant HMO landlords  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## LICENCE CONDITIONS

The proposed additional HMO licensing scheme will require HMO landlords to obtain a licence. The law requires that every licence must include certain mandatory conditions. The council can also include other discretionary conditions, which the council considers appropriate to improve property safety and standards and for tackling the issues identified.

The mandatory conditions are those relating to electrical, gas and fire safety, tenancy agreements, minimum sleeping room sizes and the disposal of household waste. These are required by law and must be applied. These mandatory conditions do not form part of the consultation.

The discretionary conditions are part of the consultation, and the council can decide on these in order to deal with the management, use, occupation, condition and contents of the licensed property. Details of the mandatory and proposed discretionary HMO licence conditions can be found in Evidence Pack Appendix 2.

### To what extent do you agree or disagree with the proposed additional HMO licensing discretionary conditions?

PLEASE TICK ✓ ONE BOX ONLY

|                          |                          |                            |                          |                          |                          |
|--------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|
| Strongly agree           | Tend to agree            | Neither agree nor disagree | Tend to disagree         | Strongly disagree        | Don't know               |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### If you disagree with any of the discretionary conditions for additional HMO licensing, please explain why

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

Are there any other licence conditions (that are not already covered under the mandatory or proposed discretionary licence conditions) that you think should be included?

|                                 |                                |  |
|---------------------------------|--------------------------------|--|
| Yes<br><input type="checkbox"/> | No<br><input type="checkbox"/> | Don't know<br><input type="checkbox"/> |
|---------------------------------|--------------------------------|--|

If 'Yes', please state below.

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

## LICENCE OBJECTIVES

As part of the planning process for any additional HMO licensing scheme, the council must define its objectives for the scheme, and set out how it plans to achieve these.

You can find out more about the proposed scheme objectives in the supporting consultation Evidence Pack (see page 36).

**To what extent do you agree or disagree with the proposed additional HMO licensing objectives?** PLEASE TICK ✓ ONE BOX ONLY

|  |   |  |  |   |  |
|--|---|--|--|---|--|
| Strongly agree<br><input type="checkbox"/> | Tend to agree<br><input type="checkbox"/> | Neither agree nor disagree<br><input type="checkbox"/> | Tend to disagree<br><input type="checkbox"/> | Strongly disagree<br><input type="checkbox"/> | Don't know<br><input type="checkbox"/> |
|--|---|--|--|---|--|

**If you disagree with any of the objectives for additional HMO licensing, please explain why**

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

**Are there any other additional HMO licence objectives (that are not already covered by the objectives listed) that you think should be included?**

|                                 |                                |  |
|---------------------------------|--------------------------------|--|
| Yes<br><input type="checkbox"/> | No<br><input type="checkbox"/> | Don't know<br><input type="checkbox"/> |
|---------------------------------|--------------------------------|--|

**If 'Yes', please state below**

PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY



## LICENCE FEES

---

The Housing Act 2004 permits the council to set licensing fees to cover the costs of administering and enforcing the licensing scheme over five years. HMO landlords will be required to pay a fee for each HMO property that needs a licence.

Licence fees cannot be used elsewhere in the council or used to generate a profit. As long as the licence conditions are complied with, the licence would remain valid up to a maximum of five years.

The council proposes to charge £1040 per HMO property licence. The law requires that the licence fee is collected in two parts. The first part of the fee (£540) covers the costs of processing, administering and validating the application. The second part of the fee (£500) is a contribution to the other costs incurred by the council in running and enforcing the scheme and will be charged when the licence has been granted.

The licence fee will be annually reviewed.

The full schedule of licence fees, discounts and charges can be found in Evidence Pack Appendix 3.

### What are your views on the proposed fee?

PLEASE TICK ✓ ONE BOX ONLY

| I think the fee is too high | I think the fee is at about the right level | I think the fee is too low | Don't know               |
|-----------------------------|---|----------------------------|--------------------------|
| <input type="checkbox"/>    | <input type="checkbox"/>                    | <input type="checkbox"/>   | <input type="checkbox"/> |

## LICENCE FEE DISCOUNTS

The council is proposing to offer a discount to landlords who are accredited under the London Landlords Accreditation Scheme (LLAS) of **£40.00**. More detailed information on fees, charges and discounts can be found in Evidence Pack Appendix 3.

This discount is at the discretion of the council and will be kept under review.

### What are your views on the proposed discount?

PLEASE TICK ✓ ONE BOX ONLY


|                     | I think the discount is too low | I think the discount is at about the right level | I think the discount is too high | Don't know               |
|---------------------|---------------------------------|--|----------------------------------|--------------------------|
| Accredited Landlord | <input type="checkbox"/>        | <input type="checkbox"/>                         | <input type="checkbox"/>         | <input type="checkbox"/> |

**DO YOU HAVE ANY FURTHER COMMENTS?**

The council wants to make sure that additional HMOs are safe and well-managed. Do you have any other suggestions the council should consider in helping improve the condition and management of additional HMOs in Brent?

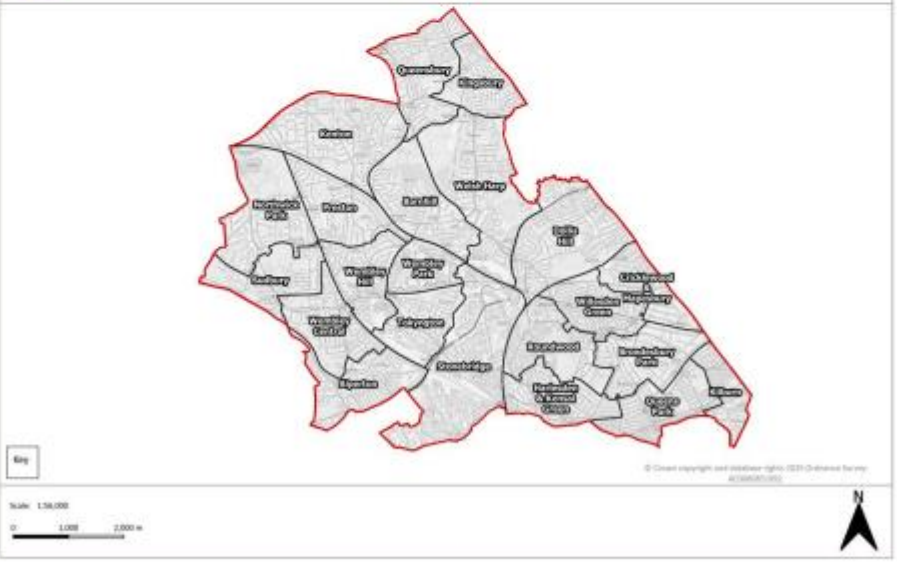
If you have any other comments that you would like to make about the council’s proposed additional HMO licensing scheme, please provide details. PLEASE ANSWER IN THE BOX BELOW AND CONTINUE ON A SEPARATE SHEET IF NECESSARY

**LICENSING DESIGNATION**

**Brent**

Map of Borough

Date: 21/02/2025



Brent Council is legally obliged to offer to send you a copy of the licensing designation(s) before any licensing scheme is introduced. These are supporting documents that define various things including the area where licensing will be required (in this case, boroughwide), as well as detailing the commencement and duration of the designation(s).

**If you would like to receive a copy of the licensing designation(s) please provide your name and email address in the box below.**

Your contact details will be used by Brent Council only for the purpose of the notification under the **Housing Act 2004** of the licensing designation(s), as required to fulfil the council's duties under **Regulation 9 (3) - The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006**. The publication requirements relating to designations require that within two weeks after the designation is confirmed or made, the local housing authority must send a copy of the notice to any person who responded to the consultation, any organisation which, to the reasonable knowledge of the authority represents the interests of landlords or tenants or property letting agents within the designated area; and every organisation within the local housing authority area that the local housing authority knows or believes provides advice on landlord and tenant matters.

**If you would like to receive a copy of the consultation report please provide your name and email address in the box below.**

The contact information will not be shared, shall be retained for no more than three years after decisions have been finalised, and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. If you are dissatisfied with the processing of your information, you can raise your concern with the council's Data Protection Officer. You have a right to lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)). Further information can be found at [Privacy Policy | Brent Council](#)

## MORE INFORMATION ABOUT YOU

What is the first part of your postcode (e.g. NW2)?

This will help us understand views in different areas

If you are providing your own personal response, please answer the questions below...

Brent Council has a duty to promote equality and want to make sure all parts of the community are included in this consultation, but these questions are optional. All consultation responses will be taken fully into account when making decisions, regardless of whether you provide your details.

How did you hear about this consultation? (tick all that apply)

- |   |   |
|---|---|
| <input type="checkbox"/> Leaflet                    | <input type="checkbox"/> Poster                 |
| <input type="checkbox"/> Email                      | <input type="checkbox"/> Brent Council website  |
| <input type="checkbox"/> Brent Council e-newsletter | <input type="checkbox"/> Local newspaper        |
| <input type="checkbox"/> Word of mouth              | <input type="checkbox"/> Other (please specify) |

What was your age on your last birthday?

- |                                   |  |
|-----------------------------------|--|
| <input type="checkbox"/> 0 to 15  | <input type="checkbox"/> 45 to 54          |
| <input type="checkbox"/> 16 to 24 | <input type="checkbox"/> 55 to 64          |
| <input type="checkbox"/> 25 to 34 | <input type="checkbox"/> 65+               |
| <input type="checkbox"/> 35 to 44 | <input type="checkbox"/> Prefer not to say |

What is your gender?

- |  |                                 |
|--|---------------------------------|
| <input type="checkbox"/> Male              | <input type="checkbox"/> Female |
| <input type="checkbox"/> Prefer not to say |                                 |

Is your gender identity different to the sex you were assumed to be at birth?

- |  |  |
|--|--|
| <input type="checkbox"/> Yes, it's different | <input type="checkbox"/> No, it's the same |
| <input type="checkbox"/> Prefer not to say   |  |

Have you been pregnant, on maternity leave or breastfeeding within the last six months?

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> Yes               | <input type="checkbox"/> No |
| <input type="checkbox"/> Prefer not to say |                             |

What is your sexual orientation?

- |   |   |
|---|---|
| <input type="checkbox"/> Heterosexual or straight | <input type="checkbox"/> Bisexual               |
| <input type="checkbox"/> Gay woman or lesbian     | <input type="checkbox"/> Other (please specify) |
| <input type="checkbox"/> Gay man                  | <input type="text"/>                            |
| <input type="checkbox"/> Prefer not to say        |   |

Are you married or in a civil partnership?

- |  |                             |
|--|-----------------------------|
| <input type="checkbox"/> Yes               | <input type="checkbox"/> No |
| <input type="checkbox"/> Prefer not to say |                             |

What is your ethnicity?

- |  |
|--|
| <input type="checkbox"/> Asian or Asian British: Bangladeshi |
| <input type="checkbox"/> Asian or Asian British: Chinese     |
| <input type="checkbox"/> Asian or Asian British: Indian      |

- |   |
|---|
| <input type="checkbox"/> Asian or Asian British: Pakistani  |
| <input type="checkbox"/> Asian or Asian British: Sri Lankan |
| <input type="checkbox"/> Asian or Asian British: Other      |

- |  |
|--|
| <input type="checkbox"/> Black or Black British: African   |
| <input type="checkbox"/> Black or Black British: Caribbean |
| <input type="checkbox"/> Black or Black British: Somali    |
| <input type="checkbox"/> Black or Black British: Other     |

- |  |
|--|
| <input type="checkbox"/> Mixed background: White and Asian           |
| <input type="checkbox"/> Mixed background: White and Black African   |
| <input type="checkbox"/> Mixed background: White and Black Caribbean |
| <input type="checkbox"/> Mixed background: Other                     |

- |  |
|--|
| <input type="checkbox"/> White or White British: British, English, Welsh, Scottish or Northern Irish |
|--|

- |   |
|---|
| <input type="checkbox"/> White or White British: Eastern European         |
| <input type="checkbox"/> White or White British: Gypsy, Roma or Traveller |
| <input type="checkbox"/> White or White British: Irish                    |
| <input type="checkbox"/> White or White British: Western European         |
| <input type="checkbox"/> White or White British: Other                    |

- |   |
|---|
| <input type="checkbox"/> Other ethnic background: Arab              |
| <input type="checkbox"/> Other ethnic background: Latin American    |
| <input type="checkbox"/> Other ethnic background: Prefer not to say |
| <input type="checkbox"/> Other ethnic background: Other             |

**Do you consider yourself to be disabled?**

- ☐ Yes ☐ No  
☐ Prefer not to say

**If you are disabled, what is the nature of your disability?** *Under the Equality Act, you are disabled if you have a long-term physical or mental impairment which affects your ability to carry out day-to-day activities.*

- ☐ Learning or developmental disabilities (including dyslexia and autism)  
☐ Long term illness (including cancer, diabetes, HIV and multiple sclerosis)  
☐ Mental health condition (including anxiety, bipolar disorder and depression)  
☐ Physical impairment (including arthritis, cerebral palsy and using a wheelchair)  
☐ Sensory impairment (including hearing, sight and speech impairments)  
☐ Prefer not to say  
☐ Other

**What is your religion or belief?**

- ☐ No religion or belief ☐ Jain  
☐ Christian ☐ Rastafarian  
☐ Jewish ☐ No religion/belief  
☐ Sikh ☐ Other (please specify)  
☐ Baha'i   
☐ Hindu ☐ Prefer not to say  
☐ Muslim  
☐ Buddhist

**How long have you owned property in Brent?**

- ☐ Less than one year ☐ 5 to 10 years  
☐ 1 to 2 years ☐ 10+ years  
☐ 2 to 5 years ☐ Not applicable



## Appendix 4 - Full written representations

### Safeagent



#### **Proposed Additional Licensing Scheme in the London Borough of Brent**

##### **Safeagent Consultation Response**

**10 June 2025**

##### **An Introduction to safeagent**

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

Safeagent agents are required to:

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

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

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

##### **Overview**

We understand Brent Council is consulting on plans to renew their borough wide additional licensing scheme after the previous scheme ended on 31 January 2025. In preparing this consultation response, we have carefully considered the information published on the council's website.

##### **Evidence base and review of existing scheme**

We note Brent Council have operated a borough wide additional licensing scheme for the last 5 years and that 2,526 properties were licensed under the previous scheme.

We are pleased to note the high property inspection rate with over 3,000 property inspections undertaken in two years. We think it is vital to undertake physical inspections to identify hazards and ensure appropriate remedial action is taken, rather than rely on desktop assessments of licence applications.

We welcome the use of banning orders by Brent Council to tackle the worst offenders and stop them from operating in the private rented sector.

Whilst we welcome the limited high level data that has been shared, we expected to see a more detailed review of the previous additional licensing scheme published alongside the business case for scheme renewal.

In relation to the evidence base, the data indicates a large spike in HMOs subject to additional licensing in Wembley Park, but very low numbers in wards such as Alperton, Barnhill, Kenton, Kingsbury, Northwick Park, Preston, Queensbury, Sudbury, Tokyngton, Welsh Harp and Wembley Central. Whilst the data includes some 'hidden HMOs', we could find no definition and no certainty what this was referring to. The data suggests a better use of limited resources could be to focus the licensing scheme on those wards with the highest number of HMOs that are cause for concern to achieve more targeted interventions.

The business case for including Wembley Park within a new additional licensing scheme looks particularly weak. Despite having the largest number of HMOs subject to additional licensing, the data shows extremely low levels of hazards, ASB incidents, tenant complaints and enforcement interventions. As the council point it, the scheme can only be introduced if the council is satisfied a significant proportion of the HMOs in that ward are being poorly managed and are giving rise to problems affecting the occupiers or members of the public. With all the published data indicating this test is not met, there appears to be no sound basis for implementing the additional licensing scheme in this ward.

#### **Section 257 HMOs (certain converted blocks of flats)**

The consultation explains the council intend to include all section 257 HMOs within the proposed additional licensing scheme.

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

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

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

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



lend on a residential mortgage for a flat within a licensed HMO, thus adversely impacting the property's value.

It is also the case that the 2024 general approval to introduce an additional licensing scheme only applies if the council has consulted persons likely to be affected by the scheme designation. Without actively consulting long leaseholder owner occupiers and explaining the implications of licensing section 257 HMOs, the conditions in the general approval would not be met and the additional licensing scheme could not be introduced without Secretary of State approval.

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

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

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

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

### **Licensing fees**

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

We understand the council is intending to charge an additional licence application fee of £1,040 plus an extra £25 / room if there are more than five habitable rooms.

We think the extra £25 / room if there are more than five habitable rooms causes unnecessary complication, particularly as most additional licences will be for properties with two, three or four bedrooms. It creates confusion about how to classify an open plan kitchen / dining / living room and could have the unintended consequence of discouraging shared living or dining rooms and space to study. We would encourage the council to remove this extra cost.

We welcome the proposed £100 discount for licence renewals. However, we note it says the discount will only be offered if the renewal application is submitted before the expiry of the existing licence. Given the significant gap between the old scheme ending and new scheme starting, this could unfairly impact on landlords with licences that expired before the new scheme was implemented. If the scheme is renewed, we would recommend this discount is extended to all landlords and

agents licensed under the previous scheme provided their renewal application is submitted within three months of any new scheme being introduced.

We note Brent Council is proposing a £40 accreditation discount and says this is restricted to landlords and managing agents accredited through the London Landlord Accreditation Scheme. We express concern that this appears to exclude safeagent accredited firms. We believe firms that pass our stringent annual verification checks to obtain accreditation status, including redress scheme membership and client money protection for any client funds held, should be eligible for the accreditation discount. We would encourage the council to give this matter further consideration. It incentivises landlords to appoint an accredited managing agent and drive up standards in the private rented sector.

We note the accreditation discount says it only applies to 'first time applications'. We would not support this approach as it is equally important to incentivise accreditation when licences are renewed.

We encourage the council to increase the accreditation discount which represents less than 4% of the licence application fee. We note some councils offer accreditation discounts up to 20%.

#### **Licence Conditions**

We have studied the proposed list of additional licence conditions published on the council's website.

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

#### **Note 5**

Insisting a property licence must be displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy agreement. We would request flexibility to display a copy of the licence or give a copy to the tenants at the start of the tenancy. If this is intended as an enforceable licence condition, it should also be moved from 'Notes' into licence conditions.

#### **Condition 3 – amenity and space**

We are unsure what this condition means in practice. It is for the local authority to assess the maximum occupancy limit when the licence is granted, and the responsibility of the licence holder to comply with that limit. If the purpose of this condition is simply to reinforce this point, we would suggest it is reworded so the meaning is clear.

#### **Condition 5 – tenant references**

We would encourage the council to review this referencing condition. The wording should be sufficiently broad to avoid excluding vulnerable groups from the private rented sector. For example, prison leavers, people granted asylum, people fleeing domestic violence and homeless people trying to move into secure accommodation may all struggle to source a reference. We would ask that the council consider the risk of exclusion as part of the equalities impact assessment and make any necessary adjustments to avoid that happening.

#### Condition 6 – rent payments

This condition duplicates condition 7 and relates to tenancy deposits. It also incorrectly says tenancy deposit information must be provided at the time the deposit is taken, whereas condition 7 correctly explains the timescale is within 30 days. This condition should be deleted.

#### Condition 8 – complaints procedure

We think it is excessive to require every private landlord, even if they let out just one property, to develop a written complaints procedure. The condition also fails to make clear if this is referring to complaints about something the landlord has, or has not done, or whether it is referring to repair reporting arrangements which are something quite different. With the Renters Right Bill soon to implement a national landlord register and a mandatory landlord redress scheme, we would suggest this condition be deleted and let the new legislative framework to cover this topic.

#### Condition 9 / 9a – anti social behaviour

We think it is excessive to require every private landlord, even if they let out just one property, to develop a written procedure to tackle any ASB that might occur, and to provide a copy to every tenant at the start of their tenancy. What might be appropriate for a large public sector landlord like the local authority or an institutional build to rent landlord, may not be reasonable for every small private landlord. We would suggest more general wording that requires the licence holder to take all reasonable and practicable steps in accordance with the procedure outlined in condition 9b.

In relation to 9a(i), we disagree with the prescriptive requirement a private landlord cannot allow anyone to rent a property in the borough unless they are satisfied they are not likely to cause anti-social behaviour. This has huge implications for exclusion. It could also effectively stop councils using the private rented sector to house chaotic families in temporary accommodation. We would invite the council to consider where families can live if they cannot afford to buy a home, are not eligible for council housing and yet are excluded from the private rented sector by this clause. We would strongly encourage the council to delete or substantially amend this clause.

We equally have concerns about condition 9a(ii). Criminal convictions, whether spent or unspent, are sensitive personal data under GDPR for which additional data handling restrictions apply. We do not think it is appropriate, and potentially not lawful, for the council to insist landlords obtain this information from every prospective tenant. We would encourage the council to seek legal advice and also seek input from the Information Commissioner's Office to ensure no sensitive data handling breach occurs. We also think it is highly irregular for a landlord or agent to be required to review a tenant's criminal convictions and decide if they should be excluded from renting a property in Brent.

In relation to 9a(iv), we do not agree the council can stipulate what information must be disclosed to a third party when providing a reference for a current or former tenant. What information, if any, is disclosed would need to be decided on a case by case basis having regard to GDPR restrictions.



#### Condition 15(c) – smoking signs

We suggest this clause is deleted. The government acknowledged over 10 years ago that most people were familiar with the no smoking rules and so detailed regulations on no-smoking signs were no longer needed. The challenges of correctly capturing this within a licence condition is not easy. For example, we understand this would not apply within shared accommodation let on a joint tenancy but would apply in the common parts of a property containing individual room lettings. The 'common parts' definition within this condition does not accurately capture that.

#### Condition 16 – external areas

The wording should be adjusted to recognise that maintaining the outside of the building and communal grounds are not the licence holder's responsibility if they are the long leaseholder of a self-contained flat within a freehold block of flats.

#### Condition 19 – Compliance Works

It is unclear how this condition is intended to be applied in practice. If any work is deemed necessary, we think it should be included as part of the licence with a clear timescale for compliance.

#### Condition 26 – Fire routine

Whilst fire procedure signs might be appropriate in a large or high risk HMO with a complex layout, it can be excessive for a shared house occupied by three friends on one joint tenancy. There is a danger that excessive signage and legal notices displayed in the tenant's home creates an unwelcome institutional feel. We would request flexibility to display the information or give a copy to the tenants at the start of the tenancy.

#### Condition 29 – Compliance with fire safety guidance

We have concerns about the last paragraph which says "*...where the fire safety provisions in place are below the LACORS recommended standard, the Council must be notified of any amendments/alterations*". The LACORS guidance is non-statutory risk based guidance that imposes no prescriptive standards. It does include some case studies but says they are not intended to be applied as prescriptive standards. That requirement should therefore be deleted.

#### Condition 33 – Absence of the Licence Holder

We assume this condition is intended for situations where the landlord is the licence holder and has decided not to appoint a managing agent. Where the landlord has appointed a safeagent accredited firm to manage their property, and this is disclosed in the licence application, no additional safeguards would be required as the council will already have the managing agent's details on the HMO licence file.

#### Condition 35 – Training

We would like to make the council aware that safeagent offers two relevant Ofqual regulated qualifications. A Level 2 Foundation Lettings Course (England) and a Level 3 Award in Letting & Property Management (England). These two courses are supplemented by a multitude of CDP courses and Lettings Learning Snacks. You can find more information on our website: <https://safeagents.co.uk/online-courses/>

#### **Condition 36 – documents to displayed**

We repeat the comment made earlier that insisting on documents being displayed in the tenant's home can create an unwelcome institutional feel, particularly when the property is let to a small group of friends on one joint tenancy. We would request flexibility to display a copy of the licence, gas safety certificate and energy performance certificate or give copies to the tenants at the start of the tenancy.

#### **Delivering effective enforcement**

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

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

#### **Recognising the important role of letting agents**

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

#### **Regulation of letting agents**

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

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

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

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

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

**Isobel Thomson**  
**Chief Executive**

Safeagent  
Cheltenham Office Park  
Hatherley Lane  
Cheltenham  
GL51 6SH

Tel: 01242 581712

Email: [Isobel.Thomson@safeagents.co.uk](mailto:Isobel.Thomson@safeagents.co.uk)

Website: <https://safeagents.co.uk>

**Brent Council – Additional Licensing Consultation**  
**Consultation on a proposal to reintroduce a borough-wide Additional Licensing scheme for the**  
**London Borough of Brent**  
**Response from Propertymark**  
**April 2025**

**Background**

1. Propertymark is the UK's leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising over 18,500 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.

**Overview**

2. Brent Council are proposing a new borough wide additional licensing scheme to replace the previous additional licensing scheme that ended on 31 January 2025. The scheme would extend licensing to all HMOs (House in Multiple Occupation) that fall outside the remit of mandatory HMO licensing. This will include HMOs occupied by three or four people and multi-occupied flats in purpose built blocks of flats where the block comprises three or more flats. The council are proposing to include section 257 HMOs within the scheme. These are properties that have been converted into flats where less than two thirds of the flats are owner occupied and the conversion into flats does not comply with the relevant building regulations.

**Summary**

3. Thank you for the opportunity to respond to the consultation on reintroducing a borough-wide additional licensing scheme in Brent. Propertymark is supportive of efforts made by local authorities to improve housing stock within the private rented sector (PRS). However, we do not think that licensing is the best method to achieve this aim. Accordingly, we object to your proposal. Propertymark would prefer a regulatory framework, which seeks to educate landlords in improving their stock rather than punitive measures that are difficult to enforce and only punish compliant landlords letting those that require improvements to go undetected. We oppose this proposal on several grounds which are set out below.

**Licensing structure**

4. **Scope of the scheme** – it is disappointing that Brent Council must renew their previous additional licensing scheme for a further five years especially as they have been operating schemes since 2015. This clearly demonstrates that the aims and objections from the previous scheme were not met, and they should find a new way of improving standards. Furthermore, we think that the proposed scheme on a local authority level would be duplicitous with the



provisions of a national landlord's registration scheme being proposed in the Renters' Rights Bill as outlined in the King's Speech 2024<sup>1</sup> and will soon be at Committee Stage in the House of Lords<sup>2</sup>. We would be grateful if Brent Council would clarify if this would be the final phase of the additional licensing scheme as we have intelligence of some local authorities considering a third phase. Additionally, some of the justifications for the scheme would not be from a direct consequence of issues within the PRS, but other housing tenures. We note that in some communities within the London Borough of Brent the percentage of social housing is greater than the percentage of PRS housing. Therefore, it is likely that any social problems within this area are contributed by social housing. Essentially, using a borough-wide scheme is difficult to find the root cause of issues and the Brent should consider targeting their scheme. Given the lack of a targeted approach, it should also be considered that in some areas of Brent, there is a very high proportion of properties that are new builds where standards are high including in the Wembley Park area of the borough. We do not think it would be appropriate to have a scheme in areas where there has been a high proportion of new builds built as the standards are generally very high.

5. **Costs of the scheme** – we hope that Brent Council can clarify how much these schemes will cost. Many additional and selective licensing schemes are a significant investment for local authorities, and we would ask that Councillors consider carefully if such a scheme offers value for money for their residents and is the most cost-effective method to improve the quality of the PRS. We note that the additional licensing scheme is being reintroduced. Accordingly, what has been the overall cumulative cost for the Council in implementing licensing. The costs should include the total costs for the Council in administering property licensing.
6. **Fees** – we recognise that costs to implement schemes are generally more expensive to run in London Boroughs than for other areas. We also recognise that Brent have made significant efforts to keep fees as low as possible for previous schemes. However, with fees of up to £1,040 for an additional licence, the fee is high given the economic challenges and costs faced by landlords operating in the area. It is also high when compared to other local authority licensing schemes including £650 in Newcastle<sup>3</sup> and £550 in Liverpool<sup>4</sup>. The fee is also higher compared to fees for many additional licenses schemes in London Boroughs where costs are typically high. We welcome the inclusion of discounts for landlords who are members of an accredited landlord's scheme and where an applicant makes a declaration to confirm no changes to circumstances or property since 1st application and the application is made before the expiry of the existing licence. However, we would recommend that the Council considers further discounts for members of accredited membership organisations such as Propertymark. We are disappointed that no consideration has been given for members of such bodies as being a member of Propertymark demonstrates that the letting agent is suitably qualified, has access to regular training and meets compliance and regulatory standards, so encourage the Council to consider discounts for Propertymark member letting agents. We also note that there is no discount for additional licensed properties which

<sup>1</sup> [The King's Speech 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/speeches/the-king-s-speech-2024)

<sup>2</sup> [Renters' Rights Bill - Parliamentary Bills - UK Parliament](https://www.parliament.uk/business/bills-and-legislation/bills/renters-rights-bill/)

<sup>3</sup> [Fees and Charges.pdf \(newcastle.gov.uk\)](https://www.newcastle.gov.uk/media/1234567/fees-and-charges.pdf)

<sup>4</sup> [Fees, discounts and exemptions - Liverpool City Council](https://www.liverpoolcitycouncil.gov.uk/media/1234567/fees-discounts-and-exemptions.pdf)



specifically disadvantages landlords with large portfolios. We would welcome clarity on how agents can pay fees and would recommend that in some instances agents may wish to pay by invoice especially if they are administering many property licenses.

7. **Impact of cost-of-living and landlords** - regardless of the fee level, we are concerned these charges will come at a time when landlords are impacted by ongoing mortgage costs, the cost-of-living crisis and the impact fees could have on the ability of landlords to improve standards. Our members have also told us that a common concern from landlords on licensing schemes is that the costs can be extremely high for landlords especially those, as we have just highlighted, as having larger portfolios of properties. These costs are especially high for landlords operating in London Borough's such as Brent.
8. **Impact on supply of homes** - exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS<sup>5</sup> found 53% of buy to let properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019. In addition to these concerns, those landlords who remain in the market, often have less money to improve conditions from increased costs. If the decision to operate a borough-wide additional licensing scheme across Brent is approved in areas that are already low demand, then there is a concern that landlords currently operating within these areas could invest in neighbouring local authority areas or exit the market altogether. This could result in fewer housing options for people living in Brent communities meaning some people might be forced to find housing options outside the area, change employment or break social ties within the community.
9. **Unintended Consequences** – we are pleased to see that Brent Council acknowledge that the PRS is an important and increasingly growing tenure that is home to many people living within the Borough and home to 1 in 3 families. Renting in Brent can be expensive with a median rent in some Brent post codes for a three bedroom property being £2,448 per calendar month (September 2024<sup>6</sup>). It is likely that many low waged and people in receipt of benefits access the PRS in Brent live in HMO property. We are concerned that landlords may increase rent due to the added and significant costs of licenses. Consequently, some renters living within the Borough will require cheaper accommodation due to being on a low income and the continued challenges in the cost-of-living crisis. We previously outlined the possibility that further legislation could reduce the housing options of the most vulnerable from landlords exiting the market there could be further implications on the rent level for those landlords who remain. As is the general law of supply and demand, if the supply of PRS property reduces, the cost of rent for the remaining properties is likely to rise. With the current demographics of persons accessing the PRS in Brent, there is a very real danger that many low-income families will be priced out of living in the area. This is acknowledged in the Brent Private Rented Sector Housing Strategy 2024 - 2029 document, which states 'whilst an increasing number of people across the country have accessed the private sector to find a

<sup>5</sup> [A shrinking private rented sector | Propertymark](#)

<sup>6</sup> [London rents map | London City Hall](#)

home, those households are often impacted most harshly with wider affordability pressures. This is particularly the case for private renters, who spend an average of 31% of their household income on rent in comparison to 27% for those in social rented properties and 18% for homeowners with a mortgage<sup>7</sup>. Considering these concerns, more local authorities that were previously considering adopting a licensing scheme are now putting plans on hold due to the impact licensing can have on supply with Blackburn and Derwen Council being the latest to cancel plans following their consultation to adopt a selective licensing scheme in an area just outside Blackburn town centre<sup>8</sup>.

#### **Improving standards**

10. **Property condition** – outside of certain wards, large parts of Brent are characterised as including significant levels of older housing stock. Areas that have these characteristics are often inner-city communities with large section of pre-1919 built housing. Accordingly, a significant amount of investment is required to improve the condition of stock including the energy efficiency of properties. We would be grateful if Brent Council could clarify if they have any proposed financial grants or loans available for landlords to improve stock.
11. **Energy efficiency** - since 1 April 2020, landlords in England and Wales can no longer let or continue to let properties covered by the Minimum Energy Efficiency Standards if they have an Energy Performance Certificate (EPC) rating below E, unless they have a valid exemption in place. The current UK Government are making provisions for revised energy efficiency standards for landlords to meet EPC C by 2030 for existing properties and EPC C by 2028 for new tenancies. According to the consultation document 'the licensing inspection regime will also enable us to identify tenants on low incomes who are living in homes with an E, F or G EPC rating and those who may be affected by fuel poverty. Tenants will be referred to the appropriate services to ensure they receive the available support, and landlords will be advised accordingly'. However, only a very small number of properties would be below EPC E, and these may be exempt. We would be grateful for further clarity for landlords in this regard.
12. **Current enforcement** – Brent Council is experienced in the implementation of Licensing Schemes with the previous schemes. We would be grateful for some clarity on the performance of previous schemes. For example, how many working days did it take for a typical licence application to be processed and issued? The Council also highlight some of the key statistics on their enforcement activity including warning letters, prosecutions, and civil penalties issues. We would be grateful if this data could be broken down by years. We would also be grateful for clarity on the reasons for issuing civil penalties for example, how many were for over-crowding, banning orders or for simply not obtaining the correct license. However, we do acknowledge the strong record Brent has in enforcement from previous schemes.

<sup>7</sup> [Brent Private Sector Housing Strategy 2024 - 2029](#)

<sup>8</sup> [Blackburn landlord licensing plan dropped after improvement | Lancashire Telegraph](#)

### Engagement

13. **Engagement with landlords and letting agents** - for most cases of substandard accommodation, it is often down to landlord's lack of understanding rather than any intent to provide poor standards. We would like clarity on how Brent Council engages with landlords and property agents including landlord forums, and training opportunities. In addition, we would welcome clarity on how the council encourages landlords and agents to be members of an accredited membership scheme such as Propertymark.
14. To strengthen this engagement, we would be very happy to support the council in engaging with our members and local property agents. A licensing scheme is a very reactive mechanism, and it is far more beneficial to have a programme of education to engage with landlords on helping them improve before a situation gets worse. We would welcome clarity on what training opportunities the council will provide to landlords and agents to help them understand their responsibilities and improve standards. We recognise the council have made strong efforts in this in the past with engagement via the Council's Landlord Forum and an accreditation scheme for local landlords. However, engagement is more credible over a longer more embedded period. Propertymark has a network of Regional Executives and a series of Regional Conferences that take place throughout the year.<sup>9</sup> We would be very happy to work with the council to engage with local agents over a virtual roundtable discussion on how standards can be improved.

### Tackling Anti-Social Behaviour (ASB)

15. Some areas of Brent are integral to the night-time economy within the Borough, and this can include international events such as those held at Wembley Stadium and Wembley Arena. Accordingly, it is likely that Anti-Social Behaviour (ASB) is contributed from a variety of sources outside private tenants.
16. We welcome the multi-agency approach the council has taken in trying to tackle anti-social behaviour including partnership work with the London Fire Brigade and the Metropolitan Police. We would be very happy to support Brent Council in this partnership work. Unfortunately, landlords are not the best equipped to deal with anti-social behaviour and certainly do not have the skills or capacity to deal with some tenants' problems such as mental health or drug and alcohol misuse. As one example, if a landlord or their agent had a tenant that was causing anti-social behaviour, the only tool that the landlord or agent could use would be to seek possession from the tenant under a Section 8 notice. While this would remedy the problem in the short-term, the tenant is likely to still occupy this behaviour and all that has been achieved is that the anti-social behaviour has moved from one part of IBrent to another or another local authority area. In this context, it should be noted that with regards to reducing anti-social behaviour, landlords and their agents can only tackle behaviour within their properties. Effectively, they are managing a contract and not behaviour. Landlords and their agents are not responsible in any form for anti-social behaviour occurring outside the

<sup>9</sup> <https://www.propertymark.co.uk/about-us/board-and-governance.html>



property. Nevertheless, we would be interested to learn about any partnership work the council are proposing with stakeholders such as the Metropolitan Police in reducing anti-social behaviour within communities including outcomes from the Home Office funded Safer Streets Programme which we have seen effectively delivered in other London Boroughs.

#### **Environmental crime**

17. The evidence document has highlighted additional licensing as a tool to tackle environmental crimes such as fly tipping, poor waste, husbandry and street cleaning. Brent also says that there has been a reduction in repeated waste related incidences (such as fly tipping) linked to HMOs. We would be interested in further evidence to highlight this point. Essentially, while we welcome efforts to tackle fly tipping, unless the perpetrator is caught doing the fly tipping or there is some sort of evidence, such as an addressed letter, within the fly tip, then it is impossible to suggest to what extent fly tipping is a problem in the PRS. Even if the link between fly tipping and the PRS could be proved, there is very little that landlords could do for any behaviour outside the tenancy unless the fly tip was done within the grounds of the property.

#### **Selective Licensing and Section 21**

18. Propertymark would like clarification on Brent Council's policy concerning helping a landlord when a section 21 notice is served, the property is overcrowded, or the tenant is causing antisocial behaviour, as per the council's consultation. What steps will the Council take to support the landlord? It would be useful if the council were to put a guidance document before introducing the scheme to outline its position regarding helping landlords remove tenants who are manifesting antisocial behaviour. The recent proposed changes to section 21 legislation and how tenancies if implemented could mean landlords will become more risk-averse to taking tenants with a perfect reference and history. We would be willing to work with the council and develop a dispute resolution service with other local authorities.

#### **Improving access to the PRS**

19. We understand that an increasing proportion of older and disabled people access the PRS in Brent. Propertymark have called for local authorities to keep a database of adaptable property to sign post older and disabled people into suitable prs housing when there is not appropriate social housing or housing is not near support networks. Given the wealth of data the council must have from previous Licensing schemes, we would be interested to know if any consideration of such a database has been given. We would also welcome further conversations with Brent on improving access particularly for vulnerable groups.

#### **Conclusions and alternatives**

20. Propertymark thinks that local authorities need a healthy private rented sector to complement the other housing in an area. This provides a variety of housing types that can meet the needs of both residents and landlords in the area. Appropriate regulation and

enforcement are essential for improving standards and removing criminals from the sector who exploit landlords and tenants. An active enforcement policy that supports good landlords and letting agents is crucial as it will remove those who exploit others and help create a level playing field. It is essential to understand how the sector operates as landlords and letting agents can often be victims of criminal activity and antisocial behaviour with their properties being exploited.

21. If the scheme is approved, the Council should consider providing an annual summary of outcomes to demonstrate to tenants, landlords and letting agents' behaviour improvements and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall. Propertymark has a shared interest with Brent Council in ensuring a high-quality private rented sector but strongly disagrees that the introduction of the proposed measures is the most effective approach to achieve this aim both in the short term and long term.
22. We would welcome the opportunity to work with Brent Council to further engage with our members and property agents in the local area.

## Appendix 5 – Letter of support

London Borough of Enfield



**Councillor Fleur Donnelly-Jackson**

Cabinet Member for Housing & Resident  
Services, Brent Council

Please reply to: Cllr Susan Erbil  
Cabinet Member for Planning and  
Regulatory Services

Email: [Susan.erbil@enfield.gov.uk](mailto:Susan.erbil@enfield.gov.uk)

Phone:

Your Ref:

Date: 5 June 2025

Dear Cllr Donnelly-Jackson

**Brent Additional HMO Licensing Scheme**

Thank you for providing the opportunity to comment on your consultation regarding the proposal to implement a new borough-wide additional licensing scheme.


Enfield Council fully supports Brent's proposal as we view licensing as a crucial tool for improving property conditions and management standards in the private rented sector.

With a growing number of Brent's residents living in shared accommodation, introducing an additional licensing scheme is essential to ensure tenants have access to safe and decent housing. Through licensing, landlords are required to proactively address property issues and comply with established licence conditions, thereby contributing to better tenancy and management standards, while making it harder for non-compliant landlords to operate.

Your supporting evidence highlights that HMO accommodation in Brent is increasingly prevalent and disproportionately subject to disrepair and hazards. Introducing a new additional licensing scheme is key for protecting residents, particularly vulnerable tenants, by ensuring they have safe, well-maintained living conditions.

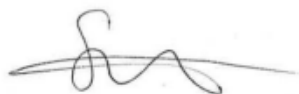
The positive impacts observed in Enfield demonstrate the effectiveness of such schemes in improving property conditions and reducing anti social behaviour. We are fully supportive of this proposal and believe it will continue to benefit Brent's communities.

Executive Director  
Environment and Communities  
Enfield Council  
Civic Centre, Silver Street  
Enfield EN1 3XY  
[www.enfield.gov.uk](http://www.enfield.gov.uk)

 If you need this document in another language or format contact the service using the details above.

I wish you every success building on the achievements of your previous scheme through this new proposal.

Kind regards



**Cllr Susan Erbil**  
**Cabinet Member for Planning and Regulatory Services**

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



## Krupesh Hirani AM

London Assembly Member for Brent and Harrow



Krupesh Hirani AM  
City Hall  
Kamal Chunchie Way  
London  
E16 1ZE

10<sup>th</sup> June 2025

### **RE: Brent Additional HMO Licensing Scheme - Help drive up standards for renters in Brent**

Dear PRS Partner,

Across the city, Londoners are struggling to find good quality, affordable homes. Rents have continued to rise, and despite positive action taken by the Mayor of London, more than a tenth of privately rented homes fail to meet the Decent Homes Standard.

In Brent, private rented housing accounts for 36% of housing stock. Rising prices and high demand mean that many Londoners are forced to accept living in poor quality, sometimes even dangerous, properties. This experience is particularly acute for disabled, low-income, and vulnerable Londoners who often have more limited choice of rental properties.

We must do all we can to ensure residents living in the private rental sector are in good quality, well-maintained properties owned by landlords who are held to account.

That is why I support Brent Council's application to expand HMO licensing. This will ensure the council can take a more proactive approach to improve renters' safety and standard of living. Licensing will add clarity regarding property management standards and will help to level the playing field, ensuring that any rogue landlords operating in Brent are held to account.

Effective licensing will also help to create safer and more comfortable communities by reducing anti-social behaviour and cleaning up our streets. Additional licensing will require landlords to properly investigate and address any anti-social behaviour complaints and will help regulate neighbourhood noise by helping landlords ensure tenants comply with rental conditions. Managing overcrowding and setting requirements on waste management provision per occupant will also help to reduce fly-tipping and enable proper waste and recycling processes.

**Telephone:** 020 7983 4377 **Email:** [krupesh.hirani@london.gov.uk](mailto:krupesh.hirani@london.gov.uk)  
**Website:** [www.krupesh.co.uk](http://www.krupesh.co.uk) **Facebook / X / Instagram:** @KrupeshHirani





Since additional HMO licensing was first introduced in 2015, Brent Council has seen positive improvements in the standard of living for tenants in shared properties, with over 5,000 licenses granted. Across London, rents are set to continue rising, and it is expected that the number of private renters in London will grow. Brent Council must ensure it can continue protecting its renters by ensuring landlords comply with strong conditions, thereby protecting those who are most vulnerable.

As the Assembly Member for Brent and Harrow, I strongly support the Council's application to extend HMO licensing. I hope that this additional licensing can come into force from Autumn 2025 and will further protect our renters from poor-quality housing, uncontrolled anti-social behaviour, and overcrowding.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Krupesh Hirani".

**Krupesh Hirani AM**  
**London Assembly Member for Brent and Harrow**

**Telephone:** 020 7983 4377 **Email:** [krupesh.hirani@london.gov.uk](mailto:krupesh.hirani@london.gov.uk)  
**Website:** [www.krupesh.co.uk](http://www.krupesh.co.uk) **Facebook / X / Instagram:** @KrupeshHirani