

Overview and Scrutiny



Housing Select Committee Agenda

7.00 pm, Wednesday, 12 October 2022
Civic Suite, Lewisham Town Hall, London SE6 4RU

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This meeting is an open meeting and all items on the agenda may be audio recorded and/or filmed.

Part 1

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Housing Select Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Wednesday, 12 October 2022.

Kim Wright, Chief Executive
Tuesday, 4 October 2022

Members	
Councillor Stephen Penfold (Chair)	
Councillor Will Cooper (Vice-Chair)	Labour Party
Councillor Natasha Burgess	Labour Party
Councillor Suzannah Clarke	
Councillor Billy Harding	Labour and Co-operative Party
Councillor Rosie Parry	Labour and Co-operative Party
Councillor Sakina Sheikh	
Councillor Mark Ingleby (ex-Officio)	
Councillor Ese Erheriene (ex-Officio)	

Minutes of the Housing Select Committee

Monday, 6 June 2022 at 7.30 pm

IN ATTENDANCE: Councillors Natasha Burgess, Suzannah Clarke, Will Cooper, Billy Harding, Mark Ingleby, Rosie Parry, Stephen Penfold and Sakina Sheikh

ALSO PRESENT: Fenella Beckman (Director of Housing), Councillor Brenda Dacres (Deputy Mayor and Cabinet Member for Housing Development and Planning), Jennifer Daothong (Executive Director for Housing, Regeneration and Public Realm), Councillor Sophie Davis (Cabinet Member for Housing Management and Homelessness), Margaret Dodwell (Chief Executive) (Lewisham Homes), Ainsley Forbes (Chair of the Board) (Lewisham Homes), Sayeed Kadir (Assistant Director of Housing Services (interim)) (London Borough of Lewisham) and Emma Talbot (Director of Planning)

ALSO PRESENT VIRTUALLY: Councillor James Rathbone, Councillor James Royston and David Syme

NB: Those Councillors listed as joining virtually were not in attendance for the purposes of the meeting being quorate, any decisions taken or to satisfy the requirements of s85 Local Government Act 1972

1. Election of Chair & Vice-Chair

RESOLVED: that Cllr Stephen Penfold and Cllr Will Cooper be elected as the Chair and Vice-Chair of the committee.

2. Minutes of the meeting held on 10 March 2022

RESOLVED: that the minutes of the last meeting be agreed as a true record.

3. Declarations of interest

The following interests were declared:

- Cllr Billy Harding is an employee of youth homelessness charity, Centre Point, which manages property in Lewisham.
- Cllr Stephen Penfold is an employee of the Lewisham Refugee and Migrant Network, a charity based in Lewisham
- Cllr Will Cooper is an employee of Community Advice Works, an advice and advocacy charity in New Cross.

4. Responses from Mayor and Cabinet

There were none.

5. Article 4 direction for HMOs

Cllr Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning, and Emma Talbot, Director of Planning, introduced the item, noting that:

- 5.1 The council's 2022 HMO review found a dramatic increase in HMOs and an overconcentration in most wards.
- 5.2 The council has also received a large amount of correspondence expressing concerns about HMOs.
- 5.3 There is now considered to be enough evidence to justify an Article 4 direction to cover the remainder of the borough.
- 5.4 An article 4 direction is not a ban on HMOs but means that a planning application will now be necessary, which will give the council better control over the quality of HMOs.
- 5.5 'Exempt accommodation' is not covered by Article 4.

The committee asked a number of questions about the proposals in the report and the following key points were noted:

- 5.6 The increase in HMOs was not actively monitored following the previous introduction of an Article 4 direction in some wards in March 2020. This was in part due to the Covid-19 pandemic and officers being redeployed. There will however be some active monitoring if the current proposals are agreed. The council will also continue to work with neighbouring boroughs to mitigate any potential negative impacts.
- 5.7 There will be some landlords that will seek to convert their properties to HMOs before the Article 4 direction comes into force, but the cost risk of implementing an 'immediate' Article 4 direction, and having to pay compensation to landlords, would be significant, potentially £millions.
- 5.8 Once the Article 4 direction is in force and landlords are required to seek planning permission, there will still be applications that are approved. The council will also, however, soon be updating its local plan and strengthening its policies in this area to ensure good quality accommodation is provided.
- 5.9 Unlicensed HMOs are identified in a range of ways, including reports from neighbours, officer visits, councillor casework and monitoring increases in waste.
- 5.10 In response to queries about the issue of 'exempt accommodation' in the borough, officers agreed to look into this as a separate piece of work and approach DWP for data if necessary.

RESOLVED:

- that the contents of the 2022 HMO review and evidence paper be noted;
- that the financial and legal implications of making the proposed Article 4 direction be noted; and
- that the committee receives further information, at a date to be agreed, on the extent of 'exempt accommodation' in the borough.

6. Housing Revenue Account business plan

Cllr Sophie Davis, Cabinet Member for Housing Management and Homelessness, introduced the item noting that:

- 6.1 The development of the HRA Business Plan is crucial to delivering the housing that Lewisham needs and improving the quality of existing council housing stock.
- 6.2 This includes improving the energy efficiency of our homes in line with the council's ambitious climate target.
- 6.3 Once developed the HRA Business Plan will be presented to Mayor & Cabinet as part of council's budget in February 2023.

Fenella Beckman, Director of Housing Services, also noted that:

- 6.4 One of the main reasons the HRA business plan is being developed and brought to scrutiny at an early stage is because the council is nearly at the limit of what it can afford to borrow and will need to prioritise if additional commitments are made from the HRA.
- 6.5 The HRA business plan will help to prioritise and ensure that the council efficiently manages its business as a landlord, meets its statutory responsibilities, and demonstrates that it can borrow and manage risks.

Margaret Dodwell, Chief Executive of Lewisham Homes, also noted that:

- 6.6 The 47% compliance figure for the decent homes standard was in large part due to fire doors being retrospectively deemed as defective and needing to be replaced.
- 6.7 Decent homes compliance currently stands at 85% and is on target to achieve 100% by the autumn, subject to residents granting access.
- 6.8 Lewisham Homes will provide a more comprehensive update to the committee in September.

The committee asked a number of questions about the HRA business plan and the following key points were noted:

- 6.9 Each scheme in the Building for Lewisham programme will need to satisfy a number of financial criteria to be recommended for approval by Mayor & Cabinet. Where a scheme isn't able to satisfy the relevant criteria the council will assess the options in consultation with lead members.
- 6.10 The council does currently have a balanced HRA. Having a business plan helps to increase the HRA's resilience by making provision for issues such as bad debt and non-collection of rent etc. but will be kept under review given the growing cost of living crisis.
- 6.11 In response to questions about repairs and energy efficiency of homes, it was noted that Lewisham Homes is looking closely at this issue as a number of their street properties have very high maintenance and heating costs and may not be suitable or affordable for some households.
- 6.12 It was also noted that some residents can be reluctant to provide access for repairs and maintenance for many reasons, but one of the main reasons is the time it can take, particularly for electricity checks, for example. It was also noted, however, that 100% of Lewisham Homes properties have been gas safety certified.
- 6.13 Lewisham Homes' 19/20 stock condition survey was primarily focused on the decent homes standard. There has been separate work on issues such as

lifts and large-panel systems and Lewisham Homes is working with the council to assess the costs and develop a strategic approach to address this.

6.14 In response to queries about the status of the 1,000 council homes in the Building for Lewisham programme, officers agreed to provide the committee with detailed figures on this.

RESOLVED:

- that the report and presentation be noted; and
- that the committee receives further detail on the status of the 1,000 homes in the council's Building for Lewisham programme.

7. Future of Housing Managed by Lewisham Homes: Options

Cllr Sophie Davis, Cabinet Member for Housing Management and Homelessness, introduced the item noting:

7.1 That the report sets out the options for the future management of the housing stock currently managed by Lewisham homes, including the preferred option of bringing the service back in house

Paul Leo, Housing Transformation Consultant, delivered a presentation on the options and proposals, noting:

7.2 That a report is due to go Mayor & Cabinet in July. Consultation would follow in August/September with another report to Mayor & Cabinet on the outcomes of the consultation and appraisal soon after so that notice could be given to Lewisham Homes, as required under the management agreement, around December 2022.

7.3 The committee noted that one of the strengths of Lewisham Homes is its resident-led aspect and expressed concern about the possibility of losing this in any future arrangements.

7.4 In response, it was noted that strengthening the voice of the resident is a requirement of the legislative and regulatory changes to social housing and a commitment of the cabinet member. There are also opportunities to engage with residents who are already working with Lewisham Homes on their business improvement programme and set out structures for this on an ongoing basis.

7.5 The committee also asked if any guarantees could be made to staff now so that they do not leave for another housing organisation.

7.6 In response, it was noted that it is a shared objective of the council and Lewisham Homes to continue to develop and invest in staff at Lewisham Homes and that if the preferred option was pursued that most would be needed as the council doesn't have these skills in house.

7.7 The committee noted that the direction of travel with ALMOs is to bring back in house. The committee discussed whether lessons could be learned from other areas on issues such as staff and resident engagement and agreed to approach another similar local authority that has already taken this approach.

RESOLVED: that the committee has:

- considered the findings of the review of housing options;
- noted that transferring the housing landlord services may offer a better opportunity to respond to the revised regulatory and legislative requirements; noted that any decision about the future of housing management will require a decision by Mayor & Cabinet and be subject to consultation and engagement with tenants and leaseholders;
- endorsed the proposed approach to resident engagement; and
- agreed to approach other local authorities who have gone through a similar process in order to learn from their experience.

8. Lewisham Homes business plan

Cllr Sophie Davis, Cabinet Member for Housing Management and Homelessness, introduced the item noting that:

- 8.1 Under the management agreement with Lewisham Homes the council is required to approve Lewisham Homes' business plan on an annual basis.
- 8.2 Fenella Beckman, Director of Housing Services, noted that plan has been developed and endorsed through operational and strategic clienting between the council and Lewisham Homes.
- 8.3 In response to queries about retaining staff it was noted that Lewisham Homes has not put in place a specific retention scheme but is continuing to invest in staff with, for example, a management development programme.
- 8.4 It was also noted that there is scope for the council and Lewisham Homes to work together on staff development and retention now rather than waiting to see whether or not Lewisham Homes is brought back in house.
- 8.5 Lewisham Homes will return to the committee in September with more detailed performance indicators on tenancy services, rent collection and safety compliance.

RESOLVED:

- that the committee approves the business plan and recommends it to Mayor & Cabinet for approval; and
- that the committee agrees to receive more detailed information on KPIs and compliance alongside the Lewisham Homes annual report in September.

9. Select Committee work programme

The scrutiny manager introduced the work programme and invited the committee to consider potential items and agree a work programme; note opportunities for engagement; and to appoint a climate change champion for the committee. The following was noted:

- 9.1 The committee queried whether the Lewisham Homes repairs update item scheduled for November could be expanded also take into account the repairs issues faced in larger blocks by other residents such as private renters and home owners so that there can be a more joined up approach.
- 9.2 Lewisham Homes agreed to address the holistic management of blocks in the November update.
- 9.3 The committee suggested looking into the council's choice-based lettings scheme as it affects a lot of people and still generates a lot of casework for councillors.
- 9.4 The committee suggested that any engagement it decides to do with other local authorities on the topic of bringing ALMOs back in house needs to be done in September to be relevant.
- 9.5 The committee suggested keeping a watching brief on the issue of 'exempt accommodation'.
- 9.6 It was also noted that the committee has been offered a visit to the Sydney Arms rough sleeping accommodation initiative in Lewisham Road. A date will be arranged.
- 9.7 The committee also agreed to start committee meetings at 7pm going forwards, and to incorporate a 5 minute comfort break in the middle of the meeting.
- 9.8 The committee decided to appoint a climate change champion at a later date.

RESOLVED: that the committee agrees its work programme for the year ahead, notes the suggestions made by the committee and agrees to programme these in at an appropriate time.

The meeting ended at 9.55 pm

Chair:

Date:



Housing Select Committee

Declarations of Interest

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive (Director of Law)

Outline and recommendations

Members are asked to declare any personal interest they have in any item on the agenda.

1. Summary

1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests.

1.2. Further information on these is provided in the body of this report.

2. Recommendation

2.1. Members are asked to declare any personal interest they have in any item on the agenda.

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

- 5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take not part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or

guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor

- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

9. Report author and contact

9.1. Jeremy Chambers, Director of Law and Governance, 0208 31 47648



Housing Select Committee

Lewisham Homes Annual Performance Outturn Report 2021/22

Date: 12 October 2022

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors:

Fenella Beckman, Director of Housing, London Borough of Lewisham

Outline and recommendations

The purpose of this report is to provide Housing Select Committee with an overview of performance achieved by Lewisham Homes against the Annual Business Plan objectives and KPI targets in 2021/22.

Timeline of engagement and decision-making

- 2021/22 Business Plan approved by Mayor & Cabinet
- Monthly Clienting, Bi-Monthly Strategic Clienting Meetings between LBL and Lewisham Homes scheduled during the year
- Bi-Monthly LBL attendance at the LH Board
- Performance Outturn Report, Lewisham Homes Executive Leadership Team, April 2022
- Performance Outturn Report, Lewisham Homes Board, May 2022

1. Summary

- 1.1. This paper gives an overview of Lewisham Homes' performance against the Annual Business Plan objectives and key performance indicators in 2021/22.

2. Recommendations

- 2.1. Housing Select Committee are asked to note the report.

3. Policy Context

- 3.1. The Business Plan 2021/22 supports the delivery of the Lewisham Homes Corporate Plan, 2019-2023, which was developed in collaboration with London Borough of Lewisham (LBL).
- 3.2. The Business Plan also supports the aims and objectives of LBL and aligns with key priorities in Lewisham's Corporate Strategy, notably on:
 - Tackling the housing crisis.
 - Building an inclusive local economy.
 - Making Lewisham greener.
 - Building safer communities.

4. Background

- 4.1. Lewisham Homes consulted widely on setting the Corporate Plan 2019-23. This commenced with significant contributions from staff and the basis for consultation was approved by the Board. Open workshops were held to seek the views of residents. Lewisham Homes sought the views of the Mayor of Lewisham, local MPs and the Housing Select Committee and Cabinet Member for Housing.
- 4.2. During the year, Lewisham Homes worked closely with LBL to ensure alignment with LBL's approach to ICT and digitisation moving forward. This approach is also the focus of the Lewisham Homes Business Plan for 2022/23, reviewed by HSC and due to be approved by Mayor and Cabinet in September 2022.
- 4.4. This report includes the following appendices:
 - 2021/22 Annual Business Plan Performance Pack (Appendix 1)
 - 2021/22 Outturn Compliance Scorecard (Appendix 2)

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5. Annual Report to Residents 2021/22

- 5.1 The Lewisham Homes Annual Report to Residents tells the story of 2021/22 and their achievements and where it is recognised there is more to do. The production of this report was led by Resident Board Members. The annual report can be found below:

<https://www.lewishamhomes.org.uk/annual-report-2021-22/>

The annual report includes detailed coverage of the work which has been undertaken during this year in terms of services, support to residents and the community and to staff.

- 5.2 The report highlights that the continuation of the pandemic and the limitations which were in place at various points throughout the year have impacted the service, as well as staff availability and tenants' perception of services.

6. Annual Business Plan Outturn Overview

- 6.1. The announcement of the Housing Future review during the 2021/22 year impacted the actions in the Business Plan, with agreed actions, such as the review of the Target Operating Model, being put on hold while a decision is made.
- 6.2. Significant progress was made against most objectives in the Annual Plan in 2021/22, and this has successfully moved the business forward in multiple areas.
- 6.3. Of the 23 objectives, 12 were wholly completed by year-end, with six tasks being deferred and moved into the 2022/23 Lewisham Homes business plan with Board approval, five were delayed by COVID and one was removed by Lewisham Homes, as it sits with the council.
- 6.4. Two of the objectives which have been moved to 2022/23 relate to the joint work between Lewisham Homes and the council on the Asset Management and Sustainability Strategies. Following the completion of a comprehensive stock condition survey, work was undertaken in preparation for the formulation of these strategies, but the main impact of this work was the re-assessment of decent homes status of all stock.
- 6.5. This work has been signed off by the Lewisham Homes Board, but requires incorporation into the HRA Business Plan which the council is finalising. This work, alongside the new requirements in respect of building safety, led to a significant review of the capital funding requirement for future years.

7. KPI Performance 2021/22

- 7.1. The overview of the KPI performance is attached as Appendix 1 for the Lewisham Homes Business Plan PI's and Appendix 2 for compliance measures. Of the 23 KPIs tracked in the 2021/22 business plan, Lewisham Homes met or exceeded eight targets. Notable areas of success were repairs completed on first visit, overall levels of staff sickness and rent and leasehold service charge collection.
- 7.2. Seventeen business plan KPI's did not meet their targets during 2021/22. These include tenant satisfaction, repair appointments, void turnaround, complaints handling and new housing development.
- 7.3. Lewisham Homes track a total of 27 compliance metric KPI's. Of these 16 are either on target and a further four indicators are just under target. Key areas achieving good performances include asset compliance. Four indicators fell outside of target and seven fell outside the target 'amber' category.
- 7.4. Key exemption comments and actions from relevant Lewisham Homes Heads of Service on all business plan KPI's are covered in the Performance Pack attached as Appendix 1. It should be noted that performance in respect of satisfaction have fallen

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across the sector during the pandemic alongside an increase in complaints. Lewisham Homes is fully committed to delivering services that lead to higher performance against the KPIs and rising levels of resident satisfaction.

- 7.5. Thirteen evictions were carried out during the year, with nine of these related to rent arrears.

8. Customer Satisfaction 2021/22

- 8.1. Compared to 2020/2021, the overall level of tenant satisfaction remained largely the same, with a one percentage point decline over the year despite the impact on services due to the Covid pandemic. Leaseholder satisfaction increased by three percentage points compared with the previous year. The same is also true for the net promoter scores, as both for tenants and leaseholders this has improved significantly.
- 8.2. The Regulator of Social Housing's is due to introduce new Tenant Satisfaction Measures (TSM's) with effect from April 2023. Lewisham Homes have made advanced preparations for their collection during 2022/2023, so that the impact of resident perception using the new standards can be assessed.

9.

- 9.1 Lewisham Homes' community investment spend is primarily through the Community Investment Fund which was launched in 2020. This fund has been used to support the Council's borough of culture projects. The Lewisham Homes Academy lists all the training and employment support available for residents and is signposted on the careers section of the Lewisham Homes website.
- 9.2 A key part of the social value offer is support for the [Lewisham Deal](#). This is a collective commitment signed by Lewisham Council and several local partners.
- 9.3 Social value and sustainability are assessed when procuring new contracts and can be financial or in-kind support. In kind support includes volunteering to support residents. Lewisham Homes have seen an increase in social value from contractors, and the new large contracts give significant opportunities for more to be obtained over the next 10 years.
- 9.5 From local community insight, a flexible framework menu has been developed for tender documentation related to social value, to aid the supplier in determining what will deliver the outcomes needed for that community. This is regularly updated and is proportionate to the contract value.
- 9.5.1 The Community Engagement Manager also completed a survey of residents interested in training, work experience, job opportunities or information and guidance and has liaised with local schools regarding opportunities for every estate where homes are being developed.
- 9.6 Due to Covid-19 restrictions, some social value opportunities were not possible to provide, therefore alternative equivalent social value opportunities were identified, or the opportunity was postponed, such as apprenticeships and work experience sourced through local colleges and schools.
- 9.6.1 The needs of the community also changed during lockdown and Lewisham Homes adapted their delivery of some social value offers. Alternative offers included online wellbeing workshops delivered by TPAS which was attended across several Lewisham Homes Development estates.
- 9.7 The Development Directorate Social Value achievements from April 2021 – March 2022 include:

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- A local Lewisham architect provided training for 25 adult members of the local community in design and how to read plans
- Demolition contractor funding accredited/non-accredited training courses
- A local resident was recruited to be a trainee site manager at Algernon Road
- A local resident was recruited to be a Traffic Marshall at Knapdale Close
- Consultants delivered several workshops during World of Work week in collaboration with Construction Youth Trust (CYT)
 - Appointed architects, FCB studio's (former Ladywell Leisure Centre site) have delivered three architectural workshops with local schools, St Matthew's Academy, Deptford Green, and Sedgemoor Academy as part of their social value commitments
 - Planning consultant DP9 delivered five voluntary hours during a workshop about design and planning at Deptford Green School
 - Employers Agent, Silvers delivered a workshop providing two voluntary hours for children to understand programming and risk in construction
 - The Creekside scheme, has 1x graduate, 1x work experience/traineeship, 1x 14-15 work experience and 9x securing work through the project. The contractor CField have contributed 500 high visibility vest/PPE to Borough of Culture volunteers.

10. Consumer Standards

- 10.1 As Lewisham Council's Housing Management Company, Lewisham Homes is required to comply for and on behalf of the council, with the Regulator of Social Housing's (RSH) four Consumer Standards (Home, Neighbourhood and Community, Tenancy, Tenant Involvement and Empowerment). Each standard outlines the outcomes and expectations required of providers of social housing in relation to the services to which the standards relate.
- 10.2 Lewisham Homes' recent work in terms of compliance with the RSH standards, includes a self-assessment completed in 2019, followed by a Lewisham Homes Board approved independent third-party review carried out by Housing Quality Network and presented to Board in March 2021.
- 10.3 Lewisham Homes has undertaken a further self-assessment of its compliance against the consumer standards, paying particular attention to the 'specific expectations' laid out in each standard. The expectation being that landlords will comply or explain.
- 10.4 The current standards vary quite markedly in terms of both the level and detail of what the RSH requires of the social housing provider. For example, the Home Standard outlines six expectations, whereas the Tenancy Standard outlines 31. Also, some expectations in the standards set very clear requirements, whilst others are more ambiguous. As the RSH looks to update its regulatory approach over the next 18 months, it is expected that the consumer standards (some of which date back to

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2012) will be amended including being more prescriptive in terms of expectations of the provider. Changes to the standards will be factored into future self-assessments.

- 10.5 The 2022 self-assessment showed that Lewisham Homes met the standards other than areas where policy updates are required for tenancy types and the publishing of roles in relation to local area co-operation. Meeting the Decent Homes Standard is an area which remains a focus. On 31 March 2022, Decent Homes compliance was 77.37% and on 31 July 2022, this had increased to 81.76%. Lewisham Homes and the council are working closely on increasing standards of decency, and this is being factored into the HRA Business Plan.

11. Financial implications

- 11.1 This report has no additional financial implications for LBL has the costs of delivering the business plan in each year is funded from the management fee and maintenance allowances agreed as part of the HRA budget each year.

12. Legal implications

- 12.1 There are no direct legal implications arising from this report.

13. Equalities implications

- 13.1 During the year Lewisham Homes continued to deliver their Equalities, Diversity, and Inclusion (EDI) strategy, in partnership with residents and colleagues across the business, supported by the EDI staff network to drive the agenda from the staff perspective.
- 13.2 Lewisham Homes will be working to provide high quality services that are accessible, deliver outcomes, and that are continuously improving, and will involve residents in shaping the design and delivery of those services. They will also work to recruit, develop, and retain a diverse, talented, and motivated workforce that reflects the diversity of Lewisham communities.
- 13.3 A focus of the Lewisham Homes Board in respect of 2021/22 was on the ethnicity pay gap, which has been reduced from 22.6% to 18.2% over this period, with the EDI strategy continuing to deliver on actions which will support further improvements going forward.

14. Climate change and environmental implications

- 14.1 None.

15. Crime and disorder implications

- 15.1 During the year there was an increase in reports of anti-social behaviour, especially noise nuisance during lockdowns. The anti-social behaviour and housing teams worked to resolve complaints, supported by evidence from the noise app and professional witnessing service. Lewisham Homes obtained five injunctions for ASB in 2021/22, the highest annual total, and in partnership with the police and the council, they also obtained two closure orders against properties at the centre of anti-social behaviour issues.
- 15.2 Lewisham Homes have a specialist domestic abuse worker.

16. Health and wellbeing implications

- 16.1. Since the pandemic began, Lewisham Homes have provided a variety of support services for staff who are experiencing issues that are affecting their health or

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wellbeing.

- 16.2. Lewisham Homes have qualified mental health first aiders who offer mental health and well-being support.

17. Background papers

- 17.1 None.

18. Glossary

- 18.1 The following terms are used in this report:

Term	Definition
Corporate Plan	The current three-year plan of objectives for Lewisham Homes, begun in April 2019.
Annual Business Plan	The agreed set of objectives that Lewisham Homes plans to deliver each year. The Annual Business Plan which is the subject of this report is for the financial year beginning April 2020 and ending March 2021.
KPI	'Key Performance Indicator.' A measurement taken of a specific element of business performance. A KPI usually has a target that performance can be tracked against.
FRA	'Fire Risk Assessment' (These are undertaken externally by specialist fire advisors)
LBL	'London Borough of Lewisham'

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Performance Report

March 2022

Report Contents



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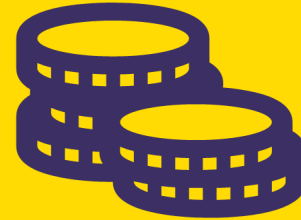
Highlights

Income Collection



Lewisham Homes rent collection for March was **99.44%, ahead of 2021/22 target** and 0.75% more than March 2021 (102.85% for acquisitions rent collected, also above target).

Leasehold Service Charge



Lewisham Homes service charge collection rate is at 106.7%, **19.4% higher than March 2021 and 4.7% above target.**

Repairs



Repairs completed at first visit was **79% for March and 87% for 2021/22** as a whole, **above its 80% target.**

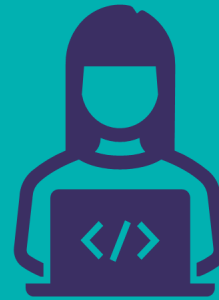
Challenges

Complaints



Complaints responded to on time for March was **81%** which is an improvement but the year end position is **23% below target**.

Human Resources



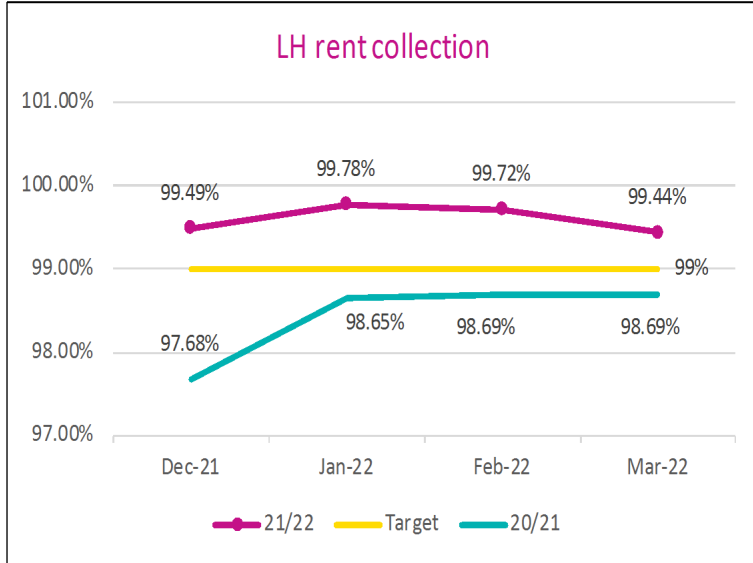
Field based staff sickness for year end was **25.8 days annual equivalent**, behind target (though office based sickness is 7.7 days, ahead of target).

Repairs

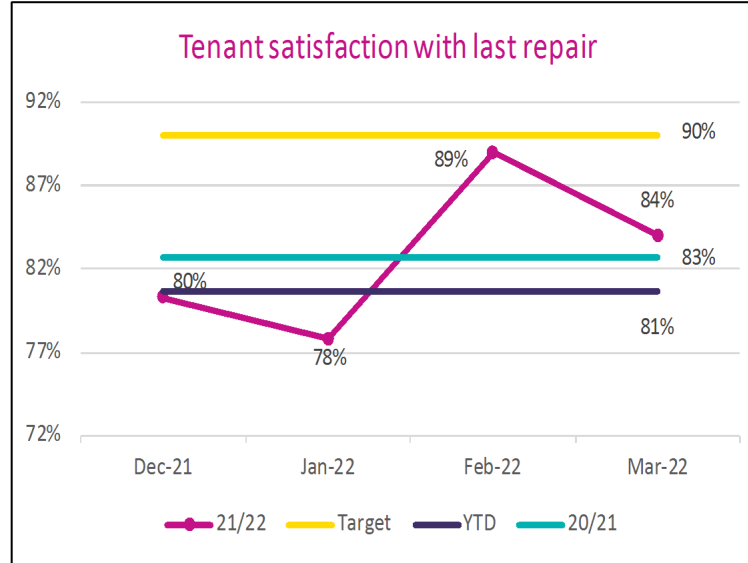


Tenant satisfaction with last repair was **84% for March** but **81% for 2021/22** as a whole, **9% below target**.

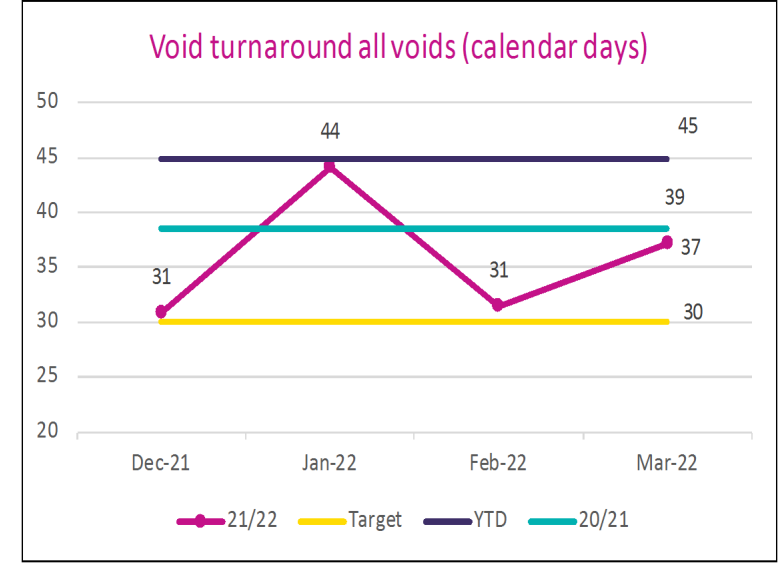
Trends



Rent collection for year end was 99.44% and has exceeded the target for 2021/22. This was partly achieved through Thames Water refunds credited in November (see Performance Scorecard). Rent collection has been on target all year though other external macro-economic factors have had a greater influence (see Key Observations). There is no YTD line as the latest monthly value is the YTD figure.

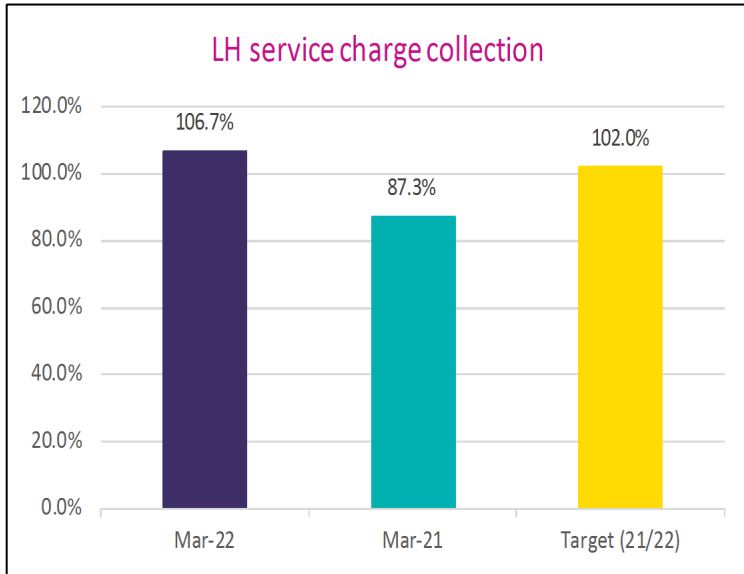


Tenant satisfaction with the last completed repair fell to 84% in March from 89% in February. Overall year end satisfaction was 81%, below the 90% target. Satisfaction has improved since June which was year low at 73%, with six of the last seven months at 80% or higher. Ease of reporting a repair was 72% in March compared to 76% last month. Being kept informed was 79% from 84% last month.

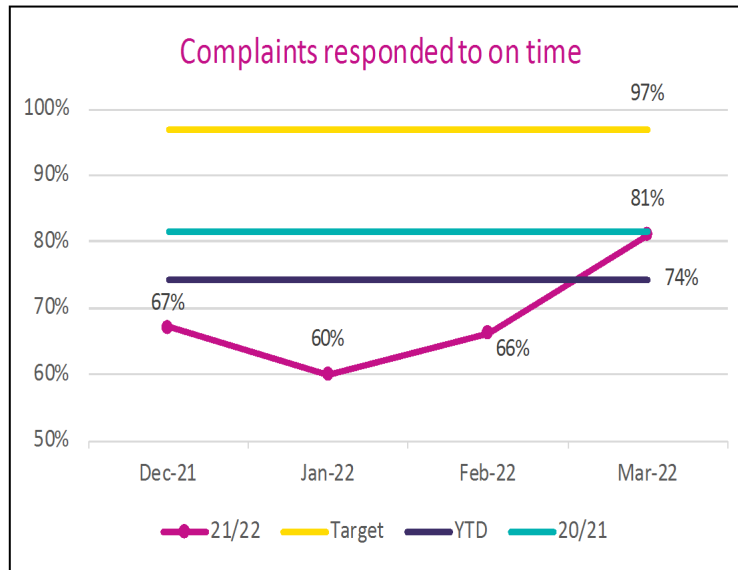


Average days to turnaround all voids has increased to 37 days in March. Overall year end average time for all voids was 45 days. Since July it has been range bound between 26 and 41 days monthly average, except for January where it was at 44 days. The second half of the year was much better with average relet time at 36 days (between October to March), compared to 52 days during first half of the year (between April to September, see Performance Scorecard), which includes figures of 89 days in May and 65 days in June.

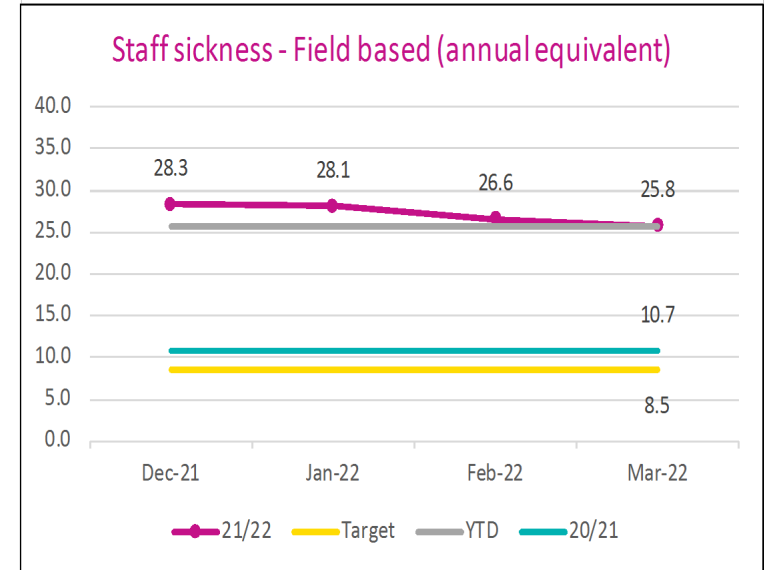
Trends



Service charge collection for year end was 106.7%, and has been consistently above the pro-rata target for the year, finishing above target by 4.7% for 2021/22. Last year it was 87.3% as leaseholders opted for payment plans for arrears due to Covid uncertainty (see Key Observations for further details).



Complaints responded to on time improved to 81% in March, the highest figure since September at 84% (see Performance Scorecard). This is closer to performance of 87% in August and the highest monthly figure of 92% in April, and is only 8% down on the figure from March 2021 of 89%. Consequently, the overall performance for 2021/22 has risen to 74%, though below 2020/21 performance of 81% and the target for 2021/22 of 97%. For further information please see the Key Observations and Exceptions Report.



Staff sickness for field based employees is now HouseMark aligned. Year end sickness at the end of March was 25.8 days, falling for the sixth consecutive month since September (see Performance Scorecard). Sickness has stabilised and is falling slowly in recent months but remains high compared to last year. Please note there is no YTD line given the latest monthly value is the YTD figure.

Key Observations

Customer Satisfaction

Customer Satisfaction experienced improvements in performance across all four metrics in the past quarter. All four metrics within Customer Satisfaction are assessed per quarter in performance, rather than monthly, but currently no metrics are above target in 2021/22 when viewed against their overall performance.

Leasehold satisfaction with the overall service has increased from 38% to 48% in the past quarter. This followed a slight improvement between the final quarter of the previous year and the first quarter of this year (45% to 46%) before a decline in the second and third quarters (41% and 38% respectively).

Tenant satisfaction with the overall service fell to 53% in the third quarter, but has since risen back to 62% in the fourth quarter, remaining consistent from the last quarter of 2020/21 and the first two quarters of 2021/22 at around 62-63%, with the overall performance at 60% against the target of 74%. Regarding comments from residents on their dissatisfaction, 48% of their comments were about repairs and customer contact (34% for repairs and 14% for customer contact).

Repairs

Two of the repairs indicators had similar figures in March to the previous month, and whilst tenant satisfaction with the last completed repair fell to 84% in March from 89% in February, the monthly figure is above overall year end satisfaction at 81%, below the 90% target. Satisfaction during the first half of the year was 78%, this improved to 83% in the second half of the year.

Repairs completed on first visit is at 79% in March and has seen a decline since its peak in August and September at 92%. However, the indicator has finished above its 80% target for the year overall at 87%. Despite the recent declines in performance, the overall figure for 2021/22 does suggest the process of fixing first time repairs is still very effective.

Appointments made and kept has bounced back after post-Christmas catchup in January, with 94% of appointments kept in March, continuing its consistent range between 93% and 95% for most of this year. The indicator has finished below its 98% target, with the overall position at 92%.

Voids

Two void metrics increased in March. Average relet time for all voids rose in March to 37 days when compared to 31 days in the previous month, and 45 days overall for 2021/22. Excluding LTVs overall 2021/22 average was 40 days. Over the course of 2021/22 both repair and lettings time have had mixed fortunes. Labour and material shortages in void repairs caused some delay in the first half of the year, with void repair time averaging 33 days, this improved when given to contractors to 20 days in the second half of the year. A similar issue arose with lettings when property advertising software was changed in April causing teething problems; this increased lettings time to 20 days in the first half of the year, but fell to 11 days as system and Covid conditions improved in the second half of the year.

Minor works relet time fell in March to 30 days, compared to 32 days in February, with overall 2021/22 relet time being 32 days as well. Major works relet time rose to 57 days in March, compared to 30 days in February, with overall 2021/22 relet time being 46 days.

Void loss for year end was 0.53% and has fallen consistently throughout the year, from a peak of 0.67% in April and May.

Key Observations

Income Collection

Lewisham Homes rent collection was 99.44% for year end and above the 99% target. Rent collection has been above target all year and was also helped by Thames Water refund credited in November. In recent months the collection rate has tailed off due to recent "cost of living" headwinds; some of it impacted by geo-political events which has squeezed household finances in the form of sharp rises in fuel bills and food prices. Inflation is expected to peak at 9.5% (OBR projection) by end of 2022, compared to last five year average of 2.2%.

Lewisham Homes & TMOs service charge collection is also above target for year end at 106.7% against a target of 102%. We have recovered an additional £259K through payment plans for arrears built up during Covid uncertainty from the previous year.

Acquisitions rent collection was 102.85% for year end and ahead of 98% target. The team undertook a project to obtain Homeless Prevention funding from LBL to reduce arrears of those acquired tenants meeting the funding criteria, this has significantly helped to improve performance.

Current tenant arrears as a percentage of the annual rent debit was 5.15% for 2021/22, and the annual rent debit was £69,487,826.

Customer Relations

Overall performance for Customer Relations increased in March, moving away from the lower figures experienced towards the end of 2021 and beginning of 2022. Complaints responded to on time rose to 81% in March from 66% in February, having previously reached 87% and 84% in August and September and been as high as 92% in April before dropping to 84% in May. For further information please see the Trends and Exceptions Report part of this report.

The percentage of FOIs responded to on time fell from 100% to 60% in the past month, though these percentages only involve small numbers of FOIs and can fluctuate from month to month. Three from five FOIs were responded to on time for March, compared to one from one for February and one from three for January. Previous figures for FOIs were at 100% for August and 60% for September, with the former (alongside February) matching its target figure for 2021/22. In total for 2021/22, 39 from 64 FOIs have been responded to on time.

A gap exists between the 2021/22 figures for the two Customer Relations metrics and their targets, with the percentage of FOIs responded to on time at 61% for 2021/22 but with a target of 100%. Complaints responded to on time is at 74% for its performance in 2021/22, but this is 23% behind its target figure of 97%, with no figure in each month of 2021/22 above the target figure for this metric.

Human Resources

Office based staff sickness for year end was 7.7 days annual equivalent, which is below the 8.5 days target. Sickness reporting is HouseMark aligned, meaning it includes in year ongoing sickness as well as closed sickness in the period; this gives a more accurate picture of actual sickness.

Field based sickness for year end was 25.8 days annual equivalent, and has fallen for the sixth consecutive month in a row. Sickness for Repairs operatives was 34.2 days annual equivalent, compared to 23.4 days for Environmental Services. In the last six months both services have seen a gradual fall in sickness. Field based sickness across other industries has increased recently due to a rise in the new Covid 19 variant, including a rise in mental health related absence which is in the top three reasons of absence along with muscular-skeletal (back problems) and chest and respiratory problems. 1.6 days was lost due to Covid out of 14.5 days sickness for all staff at year end. Please see page 9 for full covid sickness breakdown with explanatory notes.




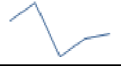
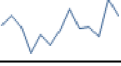





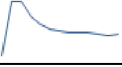
Staff turnover on a rolling 12 month basis at the end of March was 22.8%.

	2021/22	Covid sickness %
All sickness	14.5	-
All Covid sickness	1.6	11.0%
Office based all sickness	7.7	-
Office based Covid sickness	1.1	14.3%
Field based all sickness	25.8	-
Field based Covid sickness	2.5	9.7%
Repair Service all sickness	34.2	-
Repair Service Covid sickness	2.2	6.4%
Environmental Service all sickness	23.4	-
Environmental Service Covid sickness	2.7	11.5%













Summary

Covid sickness for all staff was 1.6 working days lost for year end 2021/22, this represented 11% of all sickness. Covid sickness was the highest as a proportion amongst office based staff; with 1.1 working days lost (13%) out of 7.7 days for this group. Covid sickness was lower amongst field based staff at 9.7%, however, there is a difference within this group. Covid sickness was higher within Environmental Services (caretakers) at 11.5%, which is lower than office based staff. The lowest proportion of Covid sickness was within Repairs Service (operatives) at 6.4%, also lower than office based staff. It should be noted that non-Covid sickness within Repairs Service is largely due to a handful of long-term sickness cases having a greater impact on reducing the proportion of Covid sickness.

Performance Scorecard

No	Indicator	Polarity	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Trend	Target	YTD Status	+/-
Customer Satisfaction																			
1	Tenant satisfaction with the overall service	High is best	63%	62%			63%			53%			62%		74%	60%	-14%		
2	Leasehold satisfaction with the overall service	High is best	45%	46%			41%			38%			48%		55%	43%	-12%		
3	Net promoter score tenants	High is best	-4	-2			-6			-17			3		0	-5	-5		
4	Net promoter score leaseholders	High is best	-58	-55			-64			-61			-60		-44	-60	-16		
Repairs																			
5	Tenant satisfaction with last repair	High is best	81%	84%	80%	73%	78%	75%	80%	86%	80%	80%	78%	89%	84%		90%	81%	-9%
6	Repair completed at first visit (First Time Fix)	High is best	85%	91%	90%	90%	86%	92%	92%	91%	89%	87%	86%	79%	79%		80%	87%	7%
7	Appointments made and kept	High is best	86%	89%	90%	91%	90%	93%	92%	94%	94%	95%	90%	95%	94%		98%	92%	-6%
Voids																			
8	Average days to turnaround all voids (calendar days)	Low is best	32	38	89	65	40	26	30	34	41	31	44	31	37		30	45	-15
9	Average days to turnaround major voids (calendar days)	Low is best	25	40	45	74	46	31	42	42	42	28	47	30	57		40	46	-6
10	Average days to turnaround minor voids (calendar days)	Low is best	23	34	44	29	34	24	22	28	40	32	42	32	30		19	32	-13
	Void rent loss as a percentage of annual rent roll	Low is best	0.45%	0.67%	0.67%	0.61%	0.57%	0.56%	0.55%	0.54%	0.54%	0.54%	0.53%	0.53%	0.53%		0.4%	0.53%	-0.13%

Performance Scorecard

No	Indicator	Polarity	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Trend	Target	YTD Status	+/-
Income Collection																			
12	Lewisham Homes rent collected	High is best	98.69%	101.09%	100.52%	99.96%	99.26%	99.14%	99.10%	99.04%	100.69%	99.49%	99.78%	99.72%	99.44%		99.00%	99.44%	0.44%
13	Lewisham Homes & TMOs service charge collected	High is best	87.3%	14.7%	24.0%	33.3%	43.5%	51.1%	58.7%	65.8%	72.9%	84.6%	87.2%	94.8%	106.7%		102.0%	106.7%	4.7%
14	LH acquisitions rent collected	High is best	98.94%	92.86%	93.62%	91.68%	91.52%	91.88%	91.83%	92.57%	94.91%	91.34%	94.91%	95.54%	102.85%		98.00%	102.85%	4.85%
Customer Relations																			
15	Complaints responded to on time	High is best	89%	92%	84%	80%	77%	87%	84%	72%	52%	67%	60%	66%	81%		97%	74%	-23%
16	Percentage of FOI responded to on time	High is best	100%	50%	82%	50%	75%	100%	60%	40%	43%	67%	33%	100%	60%		100%	61%	-39%
Human Resources																			
17	Staff sickness (days annual equivalent) - office based	Low is best	6.7	5.0	6.1	6.6	7.7	7.1	7.9	8.4	8.0	8.1	8.3	7.7	7.7		8.5	7.7	0.8
18	Staff sickness (days annual equivalent) - field based	Low is best	10.7	24.2	18.5	18.2	21.0	22.3	31.2	30.5	30.2	28.3	28.1	26.6	25.8		8.5	25.8	-17.3
19	Staff sickness (days annual equivalent) - all staff	Low is best	8.2	12.3	10.8	10.9	12.7	12.6	16.7	16.7	16.1	15.6	15.6	14.7	14.5		8.5	14.5	-6.0
20	Staff turnover (rolling 12 months)	Low is best	13.0%	13.3%	13.6%	13.5%	14.9%	15.9%	16.2%	16.8%	17.5%	18.8%	19.5%	20.9%	22.8%		12%	22.8%	-10.8%
Development																			
21	Number of site starts for new build	High is best	32	0	0	0	0	0	0	0	0	0	0	0	0		152	0	0
22	New build homes completed	High is best	0	0	0	0	0	0	0	0	0	0	0	6	6		69	12	0
Decants																			
23	Total live decants cases	Low is best	N/A	N/A	N/A	N/A	N/A	N/A	34	30	23	23	18	18	19		-	19	-

Exception Report

Repairs

Exception Description

Tenant satisfaction with the last completed repair fell to 84% in March from 89% in February. Satisfaction during the first half of the year was 78%, this improved to 83% in the second half of the year. Overall year end satisfaction was 81%, below the 90% target.

There are encouraging signs of improvement in several key areas like ease of reporting a repair and being kept informed; both scoring 72% and 79% respectively for March, the same as year end average. Imbedding consistent service delivery remains key to improving customer satisfaction.

Appointments made and kept has bounced back after post-Christmas catchup in January, with 94% of appointments kept in March, continuing its consistent range between 93% and 95% for most of this year. The indicator has finished below its 98% target, with year end position at 92%.

Managers Comments

Satisfaction with last repair is showing a general trend to improvement, which reflects efforts to improve the service. The two main areas for improvement remain the ease of reporting, where we have reduced call wait times in recent months, and ensuring we keep residents informed. As noted these have improved significantly in recent surveys but we still have some way to go. Satisfaction with operatives attitude remains high at 94% suggesting our main issue with satisfaction is around communication rather than delivery of repairs.

The dip in the percentage of repairs completed at first visit is a reflection of tighter management of the definition. A first time completion rate of well over 90% is very high by industry standards and not supported by satisfaction figures, where residents suggest we are mid 80s for things like quality and problem solving. Although these are slightly different perception measures a first time fix rate of 80% is probably more realistic. There is of course a limit to how many repairs can be completed in a single visit. Operatives are not allowed to leave jobs without completing the repair or booking another appointment, this supports a high first time fix rate.

Appointments made and kept shows a general trend to improvement and we continue to work to prevent missed appointments.

Proposed Improvements

We are continuing to bring call wait times down through a combination of new additional staff and improving efficiency in the call centre. Improving communication is partly a cultural issue that we continue to work on with operatives and frontline staff but also a feature of limited IT systems. We have put more manual tracking of repairs in place and analysts are working on exception reports to help us identify repair issues to be more proactive.

We continue to focus operatives on completing works in a single visit and doing additional repairs where needed. This should help improve satisfaction and ensure a high first time fix rate. Work is ongoing with operatives and the scheduling team to ensure good planning, effective communication and proactive management of diaries to prevent appointments being missed.

Exception Report

Voids

Exception Description

Void relet time rose in March to 37 days for all voids, against the target of 30 days, and 45 days overall for 2021/22. Excluding LTVs overall 2021/22 average was 40 days.

Minor works relet time fell to 30 days in March, compared to 32 days in February, with overall 2021/22 relet time being 32 days. Major works relet time rose to 57 days in March, compared to 30 days in February, with overall 2021/22 relet time being 46 days. Void repairs and lettings time had challenging issues in 2021/22; dealing with labour and material shortages. Lettings was hampered by a new property advertising software glitches between April to June, but conditions improved later in the year.

Since January 2022, the majority of void repairs are completed by external contractors.

Managers Comments

2021/22 has been a challenging year for void repairs and lettings; dealing with Covid, system changes, labour shortages and long-term DLO operative sickness. Since October we have implemented several measures which has improved relet times, these include: reducing DLO head count, greater use of external contractors which has improved minor works relet times, closer working relations with Housing officers.

We are receiving a disproportionate number of voids with pest control issues requiring several treatments over a number of weeks before void works can begin. We have also received properties where full gas central heating is required, as no adequate heating were found in these properties.

Recently, one of our contractors was experiencing delays in void works; as a result major works time increased in March. We are continuing to monitor this contractors' performance more closely until the delays are resolved.

Proposed Improvements

Our plan is to raise and escalate held up appeals cases at the monthly LBL Liaison meeting.

Both Lettings & Voids team are working closely with Housing officers to maximise opportunities to enter properties prior to tenancies terminating.

From January 2022, the majority of void repairs will be completed by external sub-contractors; this will reduce operative sickness and DLO head count.

Exception Report

Customer Relations

Exception Description

Complaints responded to on time rose to 81% in March from 66% in February, having dropped in previous months from 72% in October and 84% in September. The overall performance for complaints responded to on time is at 74% for 2021/22, 23% behind its target figure. For further information please see the Trends and Key Observations.

The percentage of FOIs responded to on time fell from 100% to 60% in the past month, though these percentages do involve small numbers of FOIs, with three from five FOIs responded to on time for March, compared to one from one for February and one from three for January. The overall performance for the percentage of FOIs responded to on time is at 61% for 2021/22 against a target of 100%.

Managers Comments

The number of complaints and enquiries received has increased compared to this time last year, resulting in increased pressure on staff. This is one factor influencing the fall in the percentage of complaints responded to on time in recent months. The increased pressure is exacerbated by staff turnover, which continues to have a knock-on effect on complaint and FOI response times.

Residents have reported finding it difficult to report repairs and other issues to the organisation by phone. This can result in the loss of opportunity to resolve an issue before it becomes a complaint (e.g. a missed appointment or unreturned phone call). Understanding the importance of resolving issues at the earliest point of contact remains challenging for some areas of the business. However, teams also appear to be utilising the available information (such as the open cases report) to better manage their complaints and have received training on iCasework in the past month.

In February, Lewisham Homes received its first Complaints Handling Failure Order from the Housing Ombudsman for failing to provide information for a case it was reviewing or give a reasonable explanation for the delay. We have set out some steps to ensure future failures do not occur (see Proposed Improvements).

Proposed Improvements

54 officers attended iCase user training during March, and we're currently drafting the procedure on how they can use the system to better manage and process their cases. In addition to uploading their own responses and logging stage 0 complaints, they will also be able to record and monitor the commitments made to resolve complaints so we can ensure that promises have been kept. CRT are available to provide guidance and support, with the focus currently around closing cases. Automatic reports on cases due that day are being produced, in addition to the weekly reports of all outstanding casework. We're also drafting guidance on how to deal with complaints in line with the Housing Ombudsman's updated Complaint Handling Code and produce good quality letters. On FOIs we will have a greater concentration on these in the coming months to ensure performance improves.

Steps to ensure future failures do not occur with regards to the Complaints Handling Failure Order - increased transparency with the Housing Ombudsman where information isn't available, document protocols to ensure information is stored in a standardised way and increase visibility of information, direct point of contacts for the Housing Ombudsman for each case from the service areas, directors to be made immediately aware of contact from the Housing Ombudsman, daily reporting on complaints due for that day to enable prioritisation and reduce failure.

Exception Report



Human Resources

Exception Description

Field based sickness for year end was 25.8 days annual equivalent, and has fallen for the sixth consecutive month in a row. Currently there are five ongoing sickness cases lasting more than 30 days, up from three in February, but well below the peak of 11 cases in September.

Staff turnover on a rolling 12 month basis at the end of March was 22.8%, compared to 13.3% a year ago.

Managers Comments

We have seen a significant increase in absence rates amongst our field staff in the financial year, and we are working through a longer-term plan on employee health & wellbeing. Long term absences have increased impacting on the average days of sickness. More tailored interventions to effectively manage sickness absence have taken place, which include the right balance of supporting staff with health issues to stay in or return to work sooner, and taking timely appropriate action to reduce absence rates. People Services and the H&S team have been collaborating on plans for preventative measures, and diagnostics has been completed by an Occupational Hygienist commissioned and led by H&S team. The outcomes from this will form the basis of our approach to employee health & wellbeing for 2022/23 year, with a focus on preventative sickness measures.

Lewisham Homes like other UK organisations in the financial year has been affected by the "Great Resignation", coupled with the uncertainty of the review of the ALMO by LBL impacting on our turnover. We continue to review our recruitment practises and a longer term aim under our People & Culture strategy to focus on how we retain talent. People Services continue to monitor and review exit interviews and staff feedback from the survey to develop a longer term approach to retention

Proposed Improvements

People Services to bring in Occupational Hygienist; to deliver objective risk assessments and an outcome led strategy for sickness prevention / intervention measures.

People Services continue to monitor and review exit interviews, with longer term approach to retention.

Exception Report

Development

Exception Description

The number of new build homes completed is at six for February and six for March and the number of site starts for new build is zero for 2021/22 on the Performance Scorecard. Regarding site starts for new build, the five units for Elderton Road Garages experienced a delay in awarding the contract as the bids came in over budget and were unable, during purdah, to seek an additional budget approval from LBL.

Regarding new build homes completed, 12 units were completed in this financial year against the target of 69, with six units in Canonbie in February and six units in Marnock in March.

The 25 units in Kenton Court experienced a delay due to gas meter connections and are now due to be completed in April 2022.

Managers Comments

For the five units in Grace Path and the six units in Silverdale, due to productivity/material shortages these are now programmed beyond March 2022 (now June 2022).

The sector is challenged by material and labour shortages which has impacted productivity and sequencing of works, hence delays have been felt on every scheme. Changes in briefs for some schemes that were due to have started on site by now has led to delays.

An additional factor is that build cost increases have meant changes in tenure have and design changes been required to accommodate more sales subsidy. New building regulations to come into effect on 15th June are also requiring some design changes for schemes that were about to be submitted for planning.

It should be noted that Walsham demolition has been completed and further due diligence on the site is being carried out. Demolition of Greystead Road Garages has also been completed and Valentines, Elderton and Drakes demolitions are completed.

Proposed Improvements


Regarding Elderton, tender returns have come back higher than anticipated so we are now focused on providing detailed programme information to LBL in order that a decision can be reached to enable the start. We are in direct negotiation with a preferred bidder but are yet to agree the contract sum.

Annual Business Plan 2021-22

All

Objectives due in Q4 (March 2022)

- LBL housing management system procurement
- New operating structure for Resident Services



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12 6


Landlord

Red Projects

- LBL housing management system procurement
- Rollout and integration of True Compliance

Amber Projects

- N/A




Placemaker

Red Projects

- Client newbuild and on site targets for mayor delivery ambitions
- Leasing and mobilisation of new vehicle fleet

Amber Projects

- N/A



Employer

Red Projects

- N/A

Amber Projects

- N/A



Partner

Red Projects

- N/A

Amber Projects

- N/A




Enterprise

Red Projects

- Implementing "Modern workplace"

Amber Projects

- N/A



Lewisham Homes

Annual Business Plan 2021/22



OVERALL PROGRESS	
G	The task is on target to be completed within the original timescale
A	The task is likely to miss the original target, but will be delivered in the financial year
R	The task is at high risk of not completing within the current financial year
P	The task has been successfully completed
S	The task has been deferred
B	No update has been provided for this reporting cycle

LANDLORD						
		Directorate	Target Date	Status	Comments	
BP1	Continuation of the Service Charge Modernisation project, carrying out a service-by-service review of costs, improve transparency of charges, and demonstrate value for money.	Resident Services	All year	S	Service Charge Project has paused including the work on the Service Charge Matrix. The revised project for 2022/23 has now been scoped and will start in Quarter 1 of 2022/23.	
BP2	Undertake options appraisal, and work with LBL to procure an appropriate housing management system, with a view to implementation commencing in 2022/23.	Finance and Technology	March 2022	R	Red status is due to the definition of done not being met by 31st March 2022. The procurement of the replacement system is now underway with LBL taking the lead. The first stage of the procurement has been completed and we are still on track to complete the exercise by May 2022 and implement the replacement of those functions covered by Capita by March 2023.	
BP3	Continue rollout and integration of True Compliance software, including water hygiene, playgrounds, lifts and mobility equipment.	Property	September 2021	R	Red status is due to the definition of done not being met by 31st March 2022. The project restarted in February 2022 having been paused in October 2021. The project is now progressing well. The action has been captured in the ABP for 22-23. Regarding project completion, we have identified this as June 2023 for the 'big 6', but if we are to include playgrounds/warden call/CCTV/working at height this this will take us into March 2024 (but could be sooner).	
BP4	Implement the Building Safety Programme and organisation-wide training, in line with legislation.	Property	TBC	S	Legislation is not yet in place but Lewisham Homes is taking proactive steps to set-up and roll out the Building Safety project to be ready for when the legislation is enacted. Over FY 21-22 the Building Safety Programme has been set up and incorporated into the ROG Portfolio. Five Building Safety Managers have been hired to support the rollout of the Building Safety programme and support the high rise buildings managed by Lewisham Homes.	

Annual Business Plan 2021/22

LANDLORD					
		Directorate	Target Date	Status	Comments
BP5	Following guidance from government white paper, develop a joint approach with LBL for asset management and sustainability.	Property	TBC	P	Asset Management strategy has been formally presented to LBL. However, LBL will not adopt the strategy until they complete work on formulating an HRA Business Plan. The HRA Business Plan will not be adopted until after the election.
BP6	Develop a campaign to raise awareness of tenancy support services offered, and help residents to maximise their incomes and prioritise their rent.	Resident Services	December 2021	P	RAG is Purple as the campaign plan is complete. The Campaign includes 4 key events planned between July to March 2022. The four major events between July and March were completed successfully.
BP7	To consult and implement new operating structure for Resident Services, to increase efficiency in delivery of services, and improve the resident experience.	Resident Services	March 2022	P	Consultation completed 23 February. New structure is in place from 01/04, roles to populate the structure are being recruited to through April/May.

PLACEMAKER					
		Directorate	Target Date	Status	Comments
BP8	Meet client newbuild and start on site targets which contribute to the Mayor's direct delivery ambitions.	Development	All year	R	Greystead demolition has commenced start on site for the garages although not the main works which will follow after the investment works. Walsham House garages have been demolished and derisking the site for the main contractor once appointed. We have a gateway process whereby the Council SDT have to approve post tender the cost to get into contract and approve to recommend to Mayor and Cabinet. Elderton did not meet the required threshold and we may have the same issue for other schemes, therefore the council may not approve for us to get into contract and start on site. It is subject to schemes meeting the Council financial hurdles and with rising build costs it is getting more challenging and is an industry issue.
BP9	Complete the leasing and mobilisation of a new vehicle fleet with enhanced sustainability.	Property	September 2021	R	The order for new vehicles has been placed and contracts etc signed and all Gateways signed off. Therefore the leasing is completed and that was done in November 2021. However the vehicles are not now likely to arrive until September 2022 at the earliest due to global supply chain issues.
BP10	Undertake internal review of out of hours cover arrangements, linked to review of operating model. Aligned with task BP7.	Property	2022/2023	P	Review completed. New arrangements will commence from 1st July 2022.

Annual Business Plan 2021/22



EMPLOYER		Directorate	Target Date	Status	Comments
BP11	Following refurbishment of office space in 2020/21 business plan, move Lewisham Homes staff into Laurence House, subject to COVID-19 safety measures.	Development	April 2021	P	Staff now able to work in Laurence House subject to social distancing guidelines. The Clearance of OTH occurred at the end of May. Closed June 2021.
BP12	Launch rollout of 'People First' customer service programme for all staff and complete first round of training.	CEO	September 2021	P	453 staff have completed a core session. Face to Face field based operative core workshops were delayed due to COVID which has impacted the timeline for the Field Based training taking place. These have now restarted. 246 staff are enrolled on the MGI LMS, and 86 have activated their learning journey on the LMS. First internal Champions support session completed. An embedding plan is being established.
BP13	Develop and deliver a new communications and engagement framework to inform and support colleagues through change. Roll out a staff survey focused on providing insight on culture and engagement from across the business.	CEO	All year	S	Action paused due change in direction around employee voice. Discussions on the use of future surveys and other methods of listening to the employee voice have been explored with the staff sounding board. The discussions will be shared with ELT.
BP14	Launch new people strategy	CEO	June 2021	P	People and Culture Strategy launched. Workplan for delivery to include RoG projects and BAU People Services activity. Closed in July 2021.
BP15	Continue to review our wellbeing offer and response to five star health and safety audit, with a view to achieving accreditation to 'ISO 45001:2018 Occupational Health and Safety Management Systems' in Q1 2022/23.	Property	All year	S	Due to the council review of Lewisham Homes, we are no longer pursuing ISO 45001 certification. However, we continue to work to the 45001 methodology and to the same standards. We are evaluating new software to support this for 2022/23. Software project group reviewing H&S platform Safe365 and will report outcome to ELT 24 May 2022.

Annual Business Plan 2021/22



PARTNER

		Directorate	Target Date	Status	Comments
BP16	Complete the transfer of five Community Centres and promote their usage to maximise benefit to the communities	Resident Services	June 2021	S	LBL have not produced the transfer agreement yet. Following the announcement of the review of the management agreement, this has been put on hold as the direction of travel will impact whether an SLA/contractual terms need to be developed by LBL.
BP17	Move core ICT services to shared LBL platform	Finance and Technology	December 2021	P	The Lift and Shift took place between the 17th to 21st March and has successfully been completed.
BP18	Establish current limitations and develop a plan to target wider access to digital services for residents.	Resident Services	All year	P	A number of initiatives have been completed around this task, including the recruitment of a digital apprentice to support access for residents and the IL technology project. We continue to support digital inclusion as part of the community investment fund applications and as a strand of our community engagement strategy. Work on this will be ongoing.

Annual Business Plan 2021/22

ENTERPRISE

		Directorate	Target Date	Status	Comments
BP19	Implementing "Modern workplace", including upgrade to Office 365 suite, and matching devices and tools, including lightweight devices, to appropriate job roles.	Finance and Technology	December 2021	R	Status is Red as the project will not be delivered in 21/22. 65% of office staff migrated to date. The pause for Lift & Shift workstream and service transition to STS has added 3 weeks delay to the project, challenge remains with resourcing for the project to increase roll-out velocity. On target for May completion.
BP20	Scope and implement finance system migration to Oracle from Integra.	Finance and Technology	December 2021	S	The move from Integra to Oracle is dependent on collaboration with LBL as this is an LBL system that will require LBL resources and decision making to implement. As part of the Raising Our Game re-focus to organisational priorities it was agreed this project would be rescheduled to take place in 2022. The final date will be dependant on LBL.
BP21	Undertake a review of legal expenditure and contracts in order to deliver a procurement strategy	Finance and Technology	September 2021	P	Timeline revised to March 2022 for lift and shift, Risks identified and mitigated (no red flags identified). TUPE discussions initiated with all parties (LH/LBLB and Brent STS). HR consultation to commence with LH Staff in Jan 22 Detailed planning for lift and shift scheduled Feb 22. ICT service/support contract review to list items for novation / transfer and termination by Jan 22
BP22	Design the target operating model for the enablement and application of the corporate strategy and vision of Lewisham Homes.	CEO	June 2021	P	Target Operating Model design was approved at 27 July LH Board. Closed August 2021.
BP23	Following the review of EDI strategy in 2020/21, launch the EDI action plan	CEO	All year	P	Action complete as the EDI action plan year 1 report presented to Board and development of the year 2 action plan is underway.

Annual Business Plan 2021/22



2020-21 ABP Outstanding Actions				
		Directorate	Ambition	Comments
EM6	New approach to organisational development and training	CEO	Employer	Action complete and transitioned into BAU.
EM7	Skills matrix and programme of training to upskill field-based staff	CEO	Employer	Transitioned to BAU due to the need to take a hybrid approach to learning and with the impact of the pandemic coupled with issues with the training matrix. This is something OD will continue to work on in 22/23 under BAU. Mandatory training includes a range of H&S training related to the job role to ensure compliance with legislation and best practice which has been identified through the training matrix as well as soft skills in line with legislation including EDI, conflict management and GDPR.
EM3	Implement new Agile Working Policy in line with ICT Roadmap	CEO	Employer	Action complete. Policy is published and will be reviewed in the new year in line with review of TWA.
PL4	Annual Business Plan 20-21: Complete the preparation and submission of planning applications for all viable schemes within Package A	Development	Placemaker	Where schemes were once viable, due to rising build costs and changes to the building regulations, some schemes changed to being not viable. We have carried out further reviews of some schemes to improve viability, such as removing the intention for rooftop development for one scheme, further value engineering others and discussing with Planning and the council the limitations of infill development and that we are not able to complete more extensive estate improvement works and improvements to existing blocks on the estate. This has slowed the programme, but in doing so we are hopeful that we can submit a further 3 schemes for planning in the next 2 months (subject to the council's approval through their new gateway system). It can take a month before we get confirmation if we can submit for planning.

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Property Services Scorecard - FY 2021-22

No	Data	Target	Mar-22		RAG	Commentary	RAG Rating Logic		
			Number Overdue	%			G	A	R
Fire Risk Assessments and Actions									
1	Fire Risk Assessments	100.00%	0	100.00%	G		All documentation completed	Documentation or assessments late, but low numbers or low risk	Overdue and not completed a regulatory requirement/ high risk or high numbers
2	Overdue FRA P1X Actions (In a Programme)	0	0		G				
3	Overdue FRA P1X Actions (Not in a Programme)	0			G				
4	Overdue FRA P1 Actions (In a Programme)	0	9		A	[9]	Fire compartmentation in a programme due for completion 2022/23		
5	Overdue FRA P1 Actions (Not in a Programme)	0	16		A	[16]	Most actions relate to gaining access to leaseholder or tenanted dwellings and taking legal action for access		
6	Overdue FRA P2 Actions	0	2968		A	[2968]	Most significant actions relate to leasehold flat front doors (2) Environmental (1231) Home Ownership (1) Housing (401) Repairs (1117) Asset Management (216) Compliance Team		
7	Overdue FRA P3 Actions	0	552		A	[552]	(383) Compliance Team (6) Home Ownership (21) Repairs (142) Asset Management		
Gas Safety									
8	Gas safety checks (domestic assets)	100.00%	0	100.00%	G				
9	Gas safety checks (communal assets)	100.00%	1	97.78%	A	[1]	Completed outside of LH's target date but within legislative requirement		
10	Gas safety checks (PSL properties)	100.00%	0	100.00%	G				
11	Ducts inspected	100.00%	0	100.00%	G				
Fire Equipment Servicing									
12	Fire Alarms	100.00%	10	98.79%	R	[7]	Serviced in early April		
13	Automatic Opening Vents	100.00%	0	100.00%	G				
14	Emergency Lighting	100.00%	10	99.03%	R	[10]	Serviced in early April		
15	Dry Risers	100.00%	0	100.00%	G				
16	Wet Risers	100.00%	0	100.00%	G				
17	Sprinklers	100.00%	0	100.00%	G				
Water Hygiene									
18	Water Tank Risk Assessments 100%	100.00%	0	100.00%	G				
19	Water Tank Overdue Risk Actions 100%	100.00%	0	100.00%	G				
Asbestos (Communal Only)									
20	Asbestos Surveys	100.00%	0	100.00%	G				
21	Asbestos Actions	100.00%	0	100.00%	G				
Lifts									
22	Passenger Lift Safety Inspections (LOLER)	100.00%	15	93.64%	R	[15]	Lifts out of service require inspection when back in service		
22	Passenger Lift Services	100.00%	3	98.73%	A	[3]	Service completed on 01/04/2022 outside of LH's target but within legislative requirements		
Lightning Conductors									
24	Services Completed	100.00%	0	100.00%	G				
Playground Inspections									
25	Number of RoSPA	100.00%	0	100.00%	G				
EICR certificates (Domestic and Communal)									
26	Domestic EICR certificates up to five years old	100.00%	577	95.72%	R		11 properties requiring a new certificate are currently Void's. These will receive a satisfactory certificate at the end of the void works. SIAM Team have 48 properties that are in their current major works programme and they will be providing Satisfactory Certificates for these properties		
27	Communal EICR certificates up to five years old	100.00%	2	99.85%	A		Unsatisfactory Certificates – 2 (Asset Management are completing works and will issue new compliant certificates upon completion of lateral mains renewal)		

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Housing Select Committee

Service Charge Policy

Date: 12 October 2022

Key decision: Yes

Class: Part 1

Ward(s) affected: Borough-wide

Contributors: Fenella Beckman, Director of Housing Services

Outline and recommendations

This report details the approach to be used to set, review and administer Service Charges for council owned properties managed by Lewisham Homes and by Regenter B3 for the Brockley PFI.

Housing Select Committee are asked to review the report and the proposed new Service Charge Policy and to support the approval of this policy by Mayor and Cabinet.

Timeline of engagement and decision-making

July / August 2022	Engagement with Lewisham Homes and Regenter B3
12 October 2022	Report to be presented to Housing Select Committee
2 November 2022	Report to be presented to Mayor and Cabinet

1. Summary

- 1.1. This policy sets out the approach to be used to set, review and administer Service Charges for properties managed by Lewisham Homes and Regenter B3. It is designed to provide clarity and transparency as to the approach and method we will use to calculate and apply service charges.

- 1.2. This policy will help to deliver the Corporate Plan, which include commitments to focus on embedding a culture of affordability, efficiency and value for money, and to deliver consistent and reliable landlord services.
- 1.3. The policy will apply to any property managed by Lewisham Homes and Regenter B3 which is subject to a service charge. This will include different property and tenure types and includes fixed and variable charges.
- 1.4. While service charges for tenants are included within scope, the rent setting and rent collection is outside of the scope of this policy. Major works and non-statutory consultation are also outside of the scope of this policy.
- 1.5. At the time of writing Lewisham Homes or Regenter B3 do not manage any Shared Ownership tenure. Arrangements specific to future Lewisham Homes shared ownership properties are therefore excluded from the scope of this policy.
- 1.6. A copy of the proposed Service Charge Policy is attached as an appendix to this report.

2. Recommendations

- 1.7. Housing Select Committee are asked to review the report and the proposed new Service Charge Policy and to support the approval of this policy by Mayor and Cabinet.

3. Policy Context

- 1.8. The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Corporate Strategy objectives:
 - 1.8.1. Tackling the housing crisis – Everyone has a decent home that is secure and affordable.
- 1.9. The proposed Service Charge Policy will also support the delivery of the Lewisham Homes Corporate Plan, 2019-2023, which was developed in collaboration with Lewisham Council and will further support the management of the Brockley PFI properties in line with the contract.

4. Background

- 1.10. A service charge is the charge payable by a tenant, leaseholder, shared owner or licensee, towards the costs of services, general maintenance or repairs. It covers other charges or costs, including administrative or management costs where the cost is not recovered through a rental charge.
- 1.11. This policy has been drafted to ensure that Lewisham Homes and Regenter B3 set, review and administer Service Charges for properties they manage in accordance with current legislative, regulatory and contractual requirements.

5. Current Situation

- 1.12. The Department for Levelling Up, Housing & Communities (DLUHC) have issued a consultation on rent increases to be applied from April 2023.
- 1.13. The consultation closes on 12th October 2022, has 5 questions to be answered one of which is whether the regulations on increases should be applied for one or two years.
- 1.14. The consultation proposes a cap/ceiling to be applied for rent increase at 5% or CPI+1%, whichever is the lower.
- 1.15. However, DLUHC are also, within the consultation, seeking alternative views on 3%, 5% and 7% as cap/ceiling options or other alternatives put forward by registered providers.
- 1.16. Therefore in light of this and the final settlement the DLUHC will recommend, whilst not

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having a direct impact on this policy, it needs to be borne on mind that this increase may impact on tenants' ability to pay the service charges.

6. Service Charge Policy

- 1.17. The Service Charge policy sets out the approach used to set, review and administer Service Charges for managed properties. It is designed to provide clarity and transparency as to the approach and methods used to calculate and apply service charges.
- 1.18. The policy sets out the legislation and regulatory requirements around setting of service charges and provides a number of definitions of key terms.
- 1.19. The key principles for the policy are:
 - To comply with all applicable legislative, regulatory and contractual requirements
 - To work towards sector best practise and continual improvement.
 - Have a clear, reasonable and consistent approach across our stock in the apportionment, calculation and recovery of costs for charged services, so far as contractual obligations permit.
 - Provide cost effective services to sufficiently manage and maintain each scheme.
 - To build and develop new homes which have appropriate service charges to meet the needs of the development.
 - Utilise intelligent design to minimise ongoing charges where practical and reasonable.
 - To offer choice to residents wherever possible and practical to do so.
 - Aim to recover 100% of the costs of service charges for the provided services
 - Set estimated charges to reasonably reflect estimated expenditure and aim for the estimates to remain as close to the actuals as possible.
 - Seek to avoid large changes in the service charge each year.
 - To provide a range of payment methods and terms.
 - To provide access or signposting to additional sources of advice and assistance.
- 1.20. The policy goes on to set out how and when the service charges are calculated and reiterates that the charges must reflect the costs incurred and no profit can be made from the service charges.
- 1.21. Charges for tenants are included with their weekly rent, whereas leaseholders are charged a variable service charge and will receive an estimated service charge bill in April of each year. Leaseholders then receive a statement in the autumn setting out the actual costs incurred.
- 1.22. Leaseholders may be required to pay a ground rent and also buildings insurance charge which covers any shared and external areas, as well as the building structure.
- 1.23. The policy sets out the payment terms and the ways in which leaseholders can access help if they are struggling to pay their service charges.
- 1.24. Complaints relating to the application or management of the service charge policy are managed in line with the Complaints policy.
- 1.25. Residents are invited to engage in consultation around the budget setting process in the autumn of each year, with comments fed back to Housing Select Committee and Mayor and Cabinet annually.
- 1.26. The Service Charge consultation is and will be the same as the rent consultation. Lewisham Homes will set up a number of meetings with the Chairs of Tenants and

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Residents Associations as well as having a general meeting for residents who wish to attend.

1.27. Regenter B3 will consult by means of Residents Panel meeting, TRA meetings, quarterly in house magazine and emails to those residents whose contact details are held on the database.

1.28. The consultation will feed into the paper that will go to Housing Select and M&C for the rents and service charge increase.

7. Financial implications

1.29. A service charge is a charge for services and facilities provided by the authority to tenants and leaseholders accounted for within the HRA which are not covered by rents. They are payable by a tenant, leaseholder, shared owner or licensee, towards the costs of services they consume such as caretaking, general maintenance or repairs. Applicable charges for Tenants and Leaseholders are separated out from rental charges and may include administrative or management costs, where allowable, which are not charged or recovered through rents.

1.30. The charges are calculated on an annual basis to recover the costs in providing services supplied to relevant blocks, buildings and estates. The Council's managing agents, Lewisham Homes and Regenter B3, have a duty to advise on and collect these costs. The annual increase in charges is usually based on the previous September's inflation rate, which is similar to rent increases.

1.31. Tenant's service charges operate on a fixed service basis which is charged weekly in addition to their rent. Leasehold service charges operate on a variable charge basis. Leaseholders receive annual service charge bills at the beginning of each financial year, which is based on the estimated cost of the services for the coming year, covering the 12 month period from 1 April to the following 31 March.

1.32. An annual audit of service charge costs is undertaken and charges to leaseholders adjusted as necessary the following year to ensure that costs are based on actual amounts incurred.

1.33. No surplus is made from service charges as the income from these charges are credited to the HRA and off-sets the cost incurred by the HRA for the service provided.

8. Legal implications

7.1 The Landlord and Tenant Act 1985 sets out the basic ground rules for variable service charges, defining what is considered a service charge, setting out requirements for reasonableness and for prior consultation of leaseholders [See ss18 – 30 LTA 1985].

Various other pieces of legislation are relevant including: Housing Act 1980 (introduced the Right to Buy); Housing Act 1996 (powers for local authorities to reduce service charges for major works); Commonhold and Leasehold Reform Act 2002 (changes in the procedures concerning the notification of major works); Housing Act 2004 (changes in the calculation of discounts for service charges); and more recently the Building Safety Act 2022.

9. Equalities implications

1.34. An Equality impact assessment has been conducted as part of the review of this policy. No material changes have been made to the policy which would impact any protected characteristic on this occasion. The assessment did recommend using the opportunity of a future fuller review of service charges to revisit and explore decisions which could potentially benefit residents more widely.

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10. Climate change and environmental implications

1.35. None specific to this report

11. Crime and disorder implications

1.36. None specific to this report

12. Health and wellbeing implications

1.37. None specific to this report

13. Appendices

1.38. Proposed Service Charge Policy

14. Report author and contact

1.1. Fenella Beckman, Director of Housing, 020 8314 8632;
Fenella.Beckman@lewisham.gov.uk

1.2. Comments for and on behalf of the Executive Director for Corporate Resources:
Tony Riordan, Principle Accountant, 020 8314 6854, Tony.Riordan@lewisham.gov.uk

1.3. Comments for and on behalf of the Director of Law, Governance & Elections

1.4. **TBC** *is this required*

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1. Purpose and Scope

This policy sets out the approach used to set, review and administer Service Charges for properties managed by Lewisham Homes. It is designed to provide clarity and transparency as to the approach and methods we use to calculate and apply service charges.

This policy helps us to deliver our corporate plan, which include commitments to focus on embedding a culture of affordability, efficiency and value for money, and to deliver consistent and reliable landlord services.

This policy applies to any building managed by Lewisham Homes which is subject to a service charge. This includes different types of property and different types of tenure and includes fixed and variable charges.

While service charges for tenants are included within scope, the rent setting and rent collection is outside of the scope of this policy. Major works and non-statutory consultation is outside of the scope of this policy.

At the time of writing Lewisham Homes do not manage any Shared Ownership tenure. Arrangements specific to future shared ownership properties is excluded from the scope.

2. Key principles

In defining our Service Charge policy, we can confirm our approach is in line with the following key principles:

- a) Comply with all applicable legislative, regulatory and contractual requirements
- b) Work toward sector best practice and continual improvement
- c) Have a clear, reasonable and consistent approach across our managed stock in the apportionment, calculation and recovery of costs for charged services, so far as contractual obligations permit

- d) Provide cost effective services to sufficiently manage and maintain each scheme
 - e) Build and develop new homes which have appropriate service charges to meet the needs of the development
 - f) Use intelligent design to minimise ongoing charges where practical and reasonable
 - g) Offer choice to residents wherever possible and practical to do so
 - h) Aim to recover 100% of the costs of service charges for the provided services (See also note* below)
 - i) Set estimated charges to reasonably reflect estimated expenditure and aim for the estimates to remain as close to the actuals as possible
 - j) Aim to avoid large changes in the service charge each year
 - k) Provide a range of payment methods and terms
 - l) Provide access or signposting to additional sources of advice and assistance
- **Note:** Lewisham Council's Housing Revenue Account can only contain charges directly related to the management of the Council's housing stock. Therefore, leaseholders must be charged the true cost of maintaining their properties where the provision of their lease allows, to ensure tenants do not subsidise costs due from leaseholders.

3. Legislation and regulation

3.1 Relevant legislation currently includes, but is not limited to, the following:

- Housing Act 1985
- Landlord and Tenant Act 1985, & 1987
- Commercial and Leasehold Reform Act 2002
- Building Safety Bill 2020

3.2 This policy will be reviewed in line with new legislation and regulation.

3.3 The services provided will be clearly identifiable to residents, and set out in the relevant contract (Tenancy or Lease Agreement).

3.4 The method of apportionment, application and collection of the service charge is dependent on the type of the contract (tenancy or lease) and may be fixed or variable. Where there is any disparity between this policy and an individual contract, unless there is an overriding statutory requirement, the terms of the agreement will be given precedence over policy alone.

4. Terms and Definitions

This is not an exhaustive list but it defines what we mean when using these key terms in relation to service charges:

A service charge is the charge payable by a tenant, leaseholder, shared owner or licensee, towards the costs of services, general maintenance or repairs. It covers other charges or costs, including administrative or management costs where the cost is not recovered through a rental charge.

A fixed service charge is where we set the cost of providing services to a property at the beginning of each financial year. The customer pays the service charge throughout the year and at no point will there be additional amounts to pay or refunds due back.

A variable service charge is where we set an estimated charge at the beginning of the financial year, and then produce a final account once the year is complete. The final account compares our actual costs in delivering services to a property against the estimate that we set, and may result in a credit back or an additional amount due from the customer.

Management and administration fees cover our costs associated with managing properties, administering service charge and rent accounts, income collection and providing customer services. (See 6.8 footnote).

Sinking fund or reserve fund is a fund that saves money to pay for future long term maintenance and renewals required to maintained property. It provides a way to spread the cost of expensive repairs. A **depreciation charge** is a contribution to items that are purchased where the costs are depreciated over the useful life of the asset rather than being paid for from a sinking fund. **Note:** While the lease allows for it, Lewisham Homes do not currently operate sinking funds at this time.

Apportionment of costs between customers is in accord with what is set out in the legal agreement(s). Where the agreement does not specify any apportionment method, we will seek to achieve a fair and reasonable apportionment and divide costs between all residents in a block and/or estate. Charges for communal areas will be apportioned across those customers with access to these areas/services, regardless of how much an individual chooses to use them.

5. Changes to services, new services and new developments

- 5.1 Where we build and develop new schemes, we aim to have reasonable and affordable service charges that meet the needs of the scheme. We will prepare an initial estimate of service charges for proposed schemes as early as possible in the design/acquisition process.
- 5.2 We will take the following into consideration when creating service charges for new properties:
 - The cost of service charges, gross and net rents compared to those for similar properties.
 - Whether the services provided are necessary for the enjoyment of the tenancy or lease
 - Whether costs may be avoided or minimise through modified design
 - The eligibility of services provided for Housing Benefit or Universal Credit¹
 - Assessment of lifecycle costs of components to be maintained via the service charge
 - Impact on existing estates service charge where we are developing within. In some cases where estate improvement are planned this may lead to a difference in services and charges for existing residents

¹ We may still provide a service that is ineligible for UC/HB if it can be otherwise justified

- 5.3 We will notify residents of a new service charge in accordance with individual leases, covenants, deed of transfers and tenancy agreements, or at least one month prior to the commencement of the new charge where this is not prescribed.
- 5.4 We will consider requests made by residents for additional services to be provided, or to discontinue a service. We will consult with residents potentially affected by the change prior to making a decision, and provide an explanation of the decision making process.

6. Calculation and timetable

- 6.1 We calculate service charges on an annual basis to recover our costs in providing services to blocks, buildings and estates, and these are charged only for the services and work specific to that block and estate. What we can and cannot charge for, and how the charge is apportioned is set out in general terms of the lease/tenancy. As the Council's managing agent we have a duty to collect these costs. We do not make a profit from service charges.
- 6.2 Each year a review of the actual costs is undertaken as part of the annual budget setting process and recommendations made to the Council in respect of proposed charges. Where possible we aim to keep these charges within the inflation rates (September of the previous year).
- 6.3 Where required by their Tenancy Agreement, tenants will pay service charges for services provided, as listed in the tenancy agreement. For Tenants we operate on a fixed service charge basis which is charged weekly with their rent.
- 6.4 We operate a variable service charge for Leaseholders. They will receive an annual service charge bill at the beginning of each financial year, 1 April, based on the estimated cost of the services for the coming year and will cover the 12 months from 1 April to the following 31 March. When preparing the bills, we look at amounts spent in previous years and the budget for the coming year. Changes to repairs and maintenance charges are modelled on the last 3 years actual costs. Changes in communal heating are more closely linked to the prevailing energy costs.
- 6.5 Each year by 30 September leaseholders will receive a statement setting out the actual costs incurred for each service for the previous financial year, and any adjustment from the estimated charge (see 6.4). The adjustment will be included and shown in the next bill.
- 6.6 After receiving the annual service charge bill, leaseholders are required to make payment in full within 21 days of the invoice date. On request, we can arrange for interest free instalments. Where a leaseholder has failed to pay within 21 days of the invoice date or has not come to an arrangement, this is in breach of the lease and we will take recovery action, which could lead to legal proceedings.
- 6.7 A charge for building insurance is included in the service charges. This insurance covers any shared and exterior areas and the building structure. Under the terms of their lease, Leaseholders must purchase additional insurance for their demised premises.

- 6.8 There is a rent fee to use the ground on which the building stands which is known as ground rent and it is a specific condition of the lease that this is paid. The charge for ground rent is included in the invoice for the service charge and is shown as a separate charge. It can be paid with the service charge.
- 6.9 In addition to the actual cost of the services, we can recover an amount for managing and administering² the services and include overheads. This does not include any costs we pay just to manage rented properties. The management charge may be different for purpose build blocks and for flats in converted houses.
- 6.10 Estimated service charges are not altered as a result of temporary breakdown or failure to provide a service. The difference between estimated and actual costs will be identified in the year end service charge accounts, and any balance treated in line with the approach as outlined above (See 6.5).

7. Queries, complaints and appeals

- 7.1 Where a leaseholder is unable to pay for their service charges, we strongly advise them to contact Home Ownership Services immediately. After discussing the circumstances we will try to identify financial assistance that may be available in order to reach an arrangement to pay.
- 7.2 Where anyone is unhappy with a service or the service charge they are encouraged to contact us as soon as possible after they identify the issue in order to give us an opportunity to look into it, and where necessary put the matter right.
- 7.3 Complaints regarding the application or handling of this policy will be managed in accord with our complaints policy.
- 7.4 Leaseholders can use their right to dispute a service charge through the First-tier Tribunal. The tribunal is an independent organisation that has powers to sort out disputes between leaseholders and their landlords. Both landlords and leaseholders can apply to the FTT for help in dealing with an issue. If a leaseholder is unhappy with any of the charges we ask to be paid under their lease, they can take to the FTT but you have to pay a fee to the tribunal when you apply. We can often sort out disputes without the need to go to the FTT. The tribunal will decide if it is a case on which they have the power to make a decision.

8. Communication and consultation

- 8.1 We will provide information to ensure new tenants and leaseholders are made aware of the services provided and the service standards they can expect. Information will be provided in line with our data protection policy.
- 8.2 Absentee leaseholders must provide Lewisham Homes with up-to-date contact details including a correspondence address, telephone number and emergency contact information.

² In some circumstances Lewisham Homes may be the leaseholder of another landlord and will be passing on these charges plus a fee for our management/administration

- 8.3 Lewisham Homes work with Lewisham Council to keep tenants and leaseholders up to date with changes to the way services are carried out and administered. We will keep residents informed through our website, tenant and leasehold newsletters, as well as through resident consultation groups.
- 8.4 Residents are invited to comment on the proposals which will be fed back to the Mayor as part of the Council's budget setting process. We will consult, where there is an intention to change the service charge regime.
- 8.5 This policy will be made available on Lewisham Homes' website. Additional information relating to service charges can be found in the Leasehold Guide. Relevant information will be given to tenants as part of the letting and sign-up process. Future consultation on changes to policy will be reviewed in line with agreed resident engagement arrangements.
- 8.6 This policy and associated processes will be made available to staff through the Lewisham Homes intranet, as well as relevant training and briefings to ensure effective and consistent application of this policy.

9. Monitoring and controls

- 9.1 We will maintain a comprehensive monitoring system to ensure that only costs reasonably incurred as a direct result of providing services are attributed to services and recharged to residents.
- 9.2 We will monitor to measure the effectiveness, efficiency and economy of services provided and we will keep residents informed about our performance against standards set.
- 9.3 We report key performance information to our Board on a monthly basis in line with our business plan and agreed KPI's. Service charges are reported to Board as part of monthly finance reports.
- 9.4 An external audit on actual costs is carried out on an annual basis by an appointed auditor. Additional internal or external audits may be carried out, as required, to confirm compliance with legislation, as well as checks against good practice, agreed standards and policy. Lewisham Council also have the right to audit these arrangements under the terms of the Management Agreement.
- 9.5 This policy will be reviewed in line with changes to legislation and regulation.

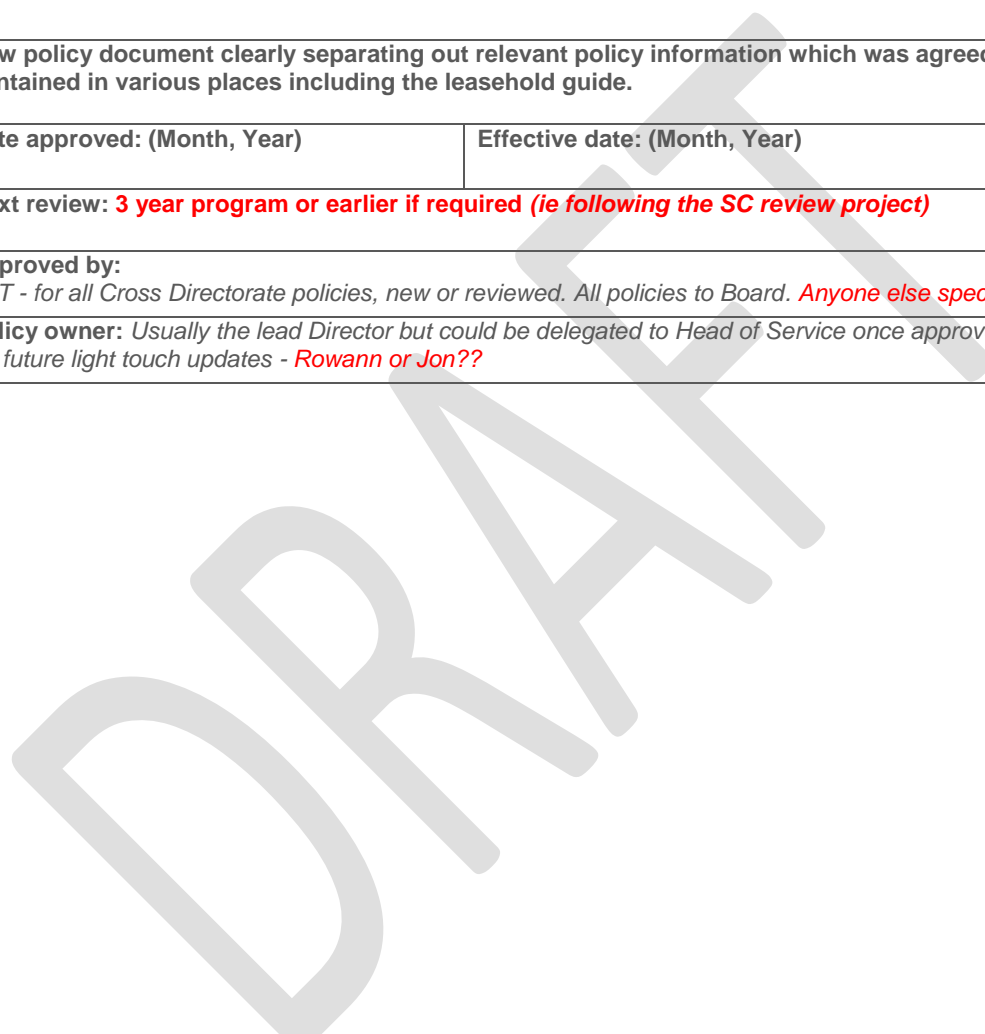
10. Equality, diversity and inclusion

- 10.1 An Equality impact assessment has been conducted as part of the review of this policy. No material changes have been made to the policy which would impact any protected characteristic on this occasion. The assessment did recommend using the opportunity of a future fuller review of service charges to revisit and explore decisions which could potentially benefit residents more widely.

11. Related documents

- **Leasehold Guide**
- **Breach of lease policy**
- For more information about service charges and the rights and obligations of landlords and leaseholders, please see the Leasehold Advisory Service (LEASE) – This is an independent organisation that provides advice and is funded by central Government. It offers free advice on the law affecting residential leasehold properties.

New policy document clearly separating out relevant policy information which was agreed but had been contained in various places including the leasehold guide.	
Date approved: (Month, Year)	Effective date: (Month, Year)
Next review: 3 year program or earlier if required (ie following the SC review project)	
Approved by: ELT - for all Cross Directorate policies, new or reviewed. All policies to Board. <i>Anyone else specific at LBL first?</i>	
Policy owner: Usually the lead Director but could be delegated to Head of Service once approved, including approval for future light touch updates - <i>Rowann or Jon??</i>	



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Housing Select Committee

Report title: Council response to the 2022 selective property licensing consultation

Date: 12 October 2022

Key decision: Yes

Class: Part 1

Ward(s) affected: 16 out of 18 (Blackheath and Telegraph Hill unaffected)

Contributors: Fenella Beckman, Director of Housing Services

Outline and recommendations

Housing Select Committee are asked to review the report and the proposed response and to provide comments.

Housing Select Committee are asked to support the approval of this response by Mayor and Cabinet, and the recommendation to proceed with an application for approval to introduce the proposed selective licensing scheme to the Department for Housing, Levelling Up and Communities.

Timeline of engagement and decision-making

24 April 2019	Previous approval to consult on selective licensing
28 May to 21 August 2019	Previous Selective Licensing consultation
11 March 2020	Mayor and Cabinet approved the submission of an application to the Secretary of State for the proposed scheme (subsequently postponed due to the Covid 19 pandemic).
20 October 2021 – 20 May 2022	Second public consultation (Extended in January 2022)

1. Summary

- 1.1. This report summarises the responses to the public consultation carried out on the council's proposals to introduce selective property licensing in 16 out of 18 wards. The consultation results demonstrate clear overall support for all three selective licensing designations proposed by the council.
- 1.2. It also sets out officers' recommendations that the council should proceed to make an application to the Department for Housing, Levelling Up and Communities (DHLUC) for approval to introduce the proposed licensing scheme, based on the response to the consultation.
- 1.3. The report of the consultation, produced by Cadence Innova, the organisation contracted by the council to carry out the consultation, is attached as Appendix 1.
- 1.4. The full summary of consultation responses and the council's proposed responses is included as Appendix 2.

2. Recommendations

- 2.1 Housing Select Committee are asked to review the report and the proposed council response to the consultation and to provide comments.
- 2.2 Housing Select Committee are asked to support the approval of the consultation report, the council's response to the consultation, and the proposed selective licensing designations and conditions, by Mayor and Cabinet.
- 2.3 Housing Select Committee are asked to support the recommendation to Mayor and Cabinet that the council should proceed to make an application to the DHLUC for approval to introduce the proposed selective licensing scheme.

3. Policy Context

- 3.1. The contents of this report are consistent with the Council's policy framework. It supports the achievements of the following Corporate Strategy objectives:
 - Tackling the housing crisis – everyone has a decent home that is secure and affordable.
- 3.2. The contents of this report support the achievement of the following Housing Strategy 2020-26 objectives

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- preventing Homelessness and meeting housing need;
- improving the quality, standard and safety of housing, and;
- supporting our residents to live safe, independent and active lives.

4. Background

- 4.1. According to the Office for National Statistics (ONS) and the Housing Stock and Stressors report findings, the private rented sector (PRS) in Lewisham has grown from 24 per cent in 2011 to 31 per cent in 2021; an increase of almost 30 per cent over 10 years. This shift has come as a result of population growth in tandem with a limited supply of new and affordable homes and therefore has resulted in soaring house prices. The Private Rented Sector has helped address the housing shortage and now 39,674 of Lewisham's 128,798 residential dwellings are privately rented.
- 4.2. The increased demand for privately rented homes has, however, also seen an increase in rents being charged in the borough. This has resulted in residents having to compromise on property standards and their health and safety to access affordable housing. The English Housing Survey (Dec 2020) indicates that 12 per cent of private rented dwellings in England had at least one category 1 hazard; a hazard that poses a serious or immediate risk to a person's health and safety. In stark contrast, 22.7 per cent of Lewisham's PRS properties were found to have at least one category 1 hazard.
- 4.3. Over half of the residential properties in the borough were built pre-Second World War (Housing Stock and Stressors Report, Metastreet, 2021). Housing conditions tend to be worse in older properties and pose greater risk to the health and safety of its inhabitants. For example, the HHSRS Operational Guidance (2006) published by the Office of the Deputy Prime Minister, stressed that there is a greater risk of winter deaths in dwellings with low energy efficiency ratings and this correlates with the age of the property. Dwellings built after 1980 are more energy efficient and are therefore safer. Wards comprising mainly of older properties are inclined to have more hazards, such as excess cold, fire and electrical issues, damp and mould.
- 4.4. The national mandatory HMO licensing scheme came into operation in April 2006.
- 4.5. Following the end of the previous additional HMO licensing scheme in February 2022, a new additional scheme came into force on Tuesday 5 April 2022.
- 4.6. The Council therefore currently operates the following licensing schemes:
 - 4.6.1. Mandatory scheme relating to all Houses of Multiple Occupation (HMO) where five people across two or more households (families) live in the same property and share facilities such as a kitchen or bathroom. This is a national scheme.
 - 4.6.2. Additional licensing applying to any HMO property in Lewisham that is not captured by the National Mandatory Scheme, other than those specifically excluded from licensing.
- 4.7. The Council previously consulted on introducing a Selective Licensing scheme in 2019; however due to the pandemic, plans to seek approval for the proposals from the Government were put on hold. As lockdown restrictions came to an end, the council reviewed housing conditions in the borough once again to take into account any demographic shifts as a result of the pandemic. Some modifications were made as to how a selective licensing scheme could operate in the borough and consequently, following Mayor and Cabinet approval to do so, the council launched a further public consultation to gain feedback on the proposals.

5. Summary of consultation and findings

- 5.1. Lewisham Council carried out a public consultation on proposals to introduce a selective licensing scheme in 16 wards. The council proposed introducing selective

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licensing in three designations, designed to tackle the most pressing issues within the wards.

5.2. Designation One – high repeated antisocial behaviour (ASB) and poor housing conditions:

- Brockley
- Catford South
- Lewisham Central
- New Cross
- Perry Vale
- Rushey Green

5.3. Designation Two – poor housing conditions:

- Crofton Park
- Evelyn
- Ladywell
- Lee Green
- Sydenham

5.4. Designation Three – deprivation:

- Bellingham
- Downham
- Forest Hill
- Grove Park
- Whitefoot

5.5. To consult with landlords, tenants, residents, stakeholders and other interested parties, the council carried out an online survey. The council also hosted public meetings with landlords, tenants, residents, and landlord groups. The council used digital and print media to advertise the consultation, as well as in-person methods, following the easing of social distancing rules.

5.6. The consultation ran for 30 weeks from 20th October 2021 to 20th May 2022.

5.7. In total 1,356 responses were received from the online survey. Qualitative feedback was received at two public meetings and ten written responses from interested parties

5.8. The consultation considered the level of support for introducing selective licensing. The consultation also looked at views on the proposed licence conditions, fees, and the respondents' perceptions of the issues in the borough.

5.9. Table of key findings:

	Overall	Landlords	Privately renting tenants	Other
Total consultation survey responses	1202	361	257	584
Agree with Selective Licensing in Designation 1	52%	13%	69%	69%
Disagree with Selective Licensing in Designation 1	36%	70%	17%	23%

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	Overall	Landlords	Privately renting tenants	Other
Total consultation survey responses	1064	337	242	488
Agree with Selective Licensing in Designation 2	47%	10%	66%	63%
Disagree with Selective Licensing in Designation 2	37%	70%	28%	23%
Total consultation survey responses	1036	321	240	475
Agree with Selective Licensing in Designation 3	48%	11%	68%	65%
Disagree with Selective Licensing in Designation 3	33%	65%	23%	20%
Total consultation survey responses	1298	391	271	636
Agree that the standard property conditions should apply to all designations	64%	29%	80%	79%
Disagree that the standard property conditions should apply to all designations	30%	61%	17%	17%
Total consultation survey responses	1250	380	264	606
Agree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 & 2	59%	24%	74%	75%
Disagree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 & 2	32%	63%	20%	18%
Total consultation survey responses	1307	393	273	641
Agree that the proposed fee for selective licensing is reasonable	44%	7%	47%	50%
Disagree that the proposed fee for selective licensing is reasonable	47%	90%	36%	40%
Total consultation survey responses	1293	387	273	633
Agree that the proposed discounts for selective licensing are reasonable?	37%	13%	46%	47%
Disagree that the proposed discounts for selective licensing are reasonable?	47%	73%	34%	37%

6. Conclusions

- 6.1. The result of the public consultation on the introduction of a selective licensing scheme demonstrated clear overall support for all three designations. Though a majority of landlord respondents disagreed with the introduction of all three designations, an overwhelming majority of both private tenants and other respondents agreed with all three designations.

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- 6.2. The primary objective of the selective licensing scheme will be to improve the quality of the rental market for private renters and a secondary objective will be to ensure that privately rented homes have a positive impact on neighbourhoods. Officers therefore recommend that the members of the Housing Select Committee should note the results of the consultation, approve the consultation report and the council's response, pending any comments the committee wish to make (see appendices).
- 6.3. Officers further recommend at this stage that some minor amendments to the scheme should be made on the basis of the consultation response, and that officers be given additional time to consider whether further amendments may be appropriate prior to seeking approval from Mayor and Cabinet committee. Officers are currently engaging with our advisors and the Department for Levelling Up, Housing and Communities on whether more material changes are advisable. Members of HSC will be updated if any further changes are made. The minor amendments officers recommend at this time are:
- The addition of a license condition regarding the exterior of the property, to place an obligation on the licence holder to ensure that all boundary walls, fences, communal gardens and yards are kept in a safe condition. This would mirror HMO management regulations and the importance of such a condition was clearly reflected in consultation responses.
 - With regard to fees, some consultation response comments stated that the fee split is unclear. Officers recommend that the fee information be updated with more information about Part A and Part B, how the parts of the fee will be used, and explanatory text outlining things such as how long the licence lasts, who should pay for the licence, what information can be changed without charge (such as change of tenants) and what changes will be charged (change of licence holder).
 - Clearly setting out which landlord accreditation organisations will be eligible for the landlord discount, to ensure that only reputable accreditation providers are accepted.
- 6.4. Officers also recommend that the committee should approve the selective licensing proposals, and support the recommendation to Mayor and Cabinet that the council should proceed to make an application to the DHLUC for approval to introduce the proposed selective licensing scheme.

7. Next steps

- 7.1. Officers will prepare a report for the council's Mayor and Cabinet committee, reflecting the recommendations of the Housing Select Committee, outlined above.
- 7.2. The report will recommend authority be delegated to the Executive Director for Housing, Environment and Regeneration to;
- finalise the application for a Selective Licensing scheme and submit to the DHLUC for ministerial approval, and;
 - implement the Selective Licensing Scheme and publish the 3-month Statutory Notice for the scheme as part of the implementation, pending necessary approvals from the Parliamentary Under-Secretary of State for Rough Sleeping and Housing.

8. Financial implications

- 8.1. This report asks Housing Select Committee to review the responses to the selective licence consultation and the proposed response. It seeks the Committee's comments and support for the approval of this response by Mayor and Cabinet, and the recommendation to proceed with an application for approval to introduce the proposed

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selective licensing scheme to the Department for Housing, Levelling Up and Communities. As such there are no direct financial implications.

- 8.2. A report was presented to Mayor and Cabinet on 11th March 2020 seeking approval for the introduction of an additional licencing scheme for all Houses in Multiple Occupation (HMOs) and for permission to apply to the Secretary of State for approval to introduce a selective licencing scheme. Although approval was granted at that time, the introduction of the schemes were delayed due to the Covid pandemic. The HMO additional licencing scheme was formally launched in April 2022. This report now proposes that permission is sought to proceed with the selective licencing application to DHLUC.
- 8.3. As outlined in the March 2020 Mayor and Cabinet report, for the selective licencing scheme, this will mean that a new fee charge would need to be introduced in order to recover the costs incurred.
- 8.4. There are significant staffing and operational costs associated with the implementation of a selective borough-wide licencing scheme. These costs, will need to be fully covered by the implementation of a licencing fee to ensure full cost recovery.
- 8.5. A comprehensive financial model has been developed to assess the resourcing implications of a new selective licencing scheme over the five-year licencing period. Based on current assumptions within the financial modelling undertaken, a fee in the region of £640 for selective licencing would be sufficient to recover costs incurred.
- 8.6. Whilst the financial modelling is robust, it does rely on assumptions of the number of licensable properties. There is a risk that the numbers could have been over/under estimated resulting in additional costs or loss of income.
- 8.7. In addition, as there is a statutory requirement to split the selective licencing fee into two parts, there is a risk that some of the fee income will remain outstanding and result in a requirement to set-up an impairment allowance (bad debt provision). This has been included within the current forecasts and financial modelling for the scheme. However, every effort will be made to ensure applicants pay the enforcement fee prior to putting forward any outstanding amounts for write-off action.
- 8.8. Mitigation against this and other risks are that staffing levels can be flexed to bring the scheme back into balance. In addition, quarterly reviews of the scheme, its implementation and resourcing will be undertaken to ensure that operational and financial performance is within the scope outlined in this and the 11th March 2020 Mayor and Cabinet reports.

9. Legal implications

- 9.1. Selective Licensing Schemes
- 9.2. Sections 79- 81 of Part 3 of the Housing Act 2004, provide local authorities with power to introduce selective licensing schemes for other houses falling outside of Part 2 of the Act, which deals with licensing of HMOs.
- 9.3. The types of houses to be licensed under a selective licensing scheme are defined within s. 79 (2) of the 2004 Act. Namely, it applies to a house “if (a) it is in an area that is for the time being designated under section 80 [for selective licensing], and (b) the whole of it is occupied either- (i) under a single tenancy or licence that is not an exempt tenancy, or (ii) under two or more tenancies or licences of different dwellings contained in it, none of which is an exempt tenancy or licence...” Further statutory considerations for a local authority apply under Part 3 of the Housing Act 2004 for selective licensing schemes, pursuant to section 80 (2)(a) and (b). These include conditions in relation to housing conditions, deprivation, migration and conditions in relation to crime and anti-social behaviour.

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- 9.4. Before making a decision to introduce selective licensing the local authority must:
- consult with those who are likely to be affected, including those who live, work or operate businesses in adjoining local authority areas where they will be affected
 - consider whether there are other effective methods of achieving the intended objective.
- 9.5. Approval by the Secretary of State is required for selective licensing schemes.
- 9.6. The Secretary of State will take into account when deciding whether to confirm a Scheme, the robustness of the proposed measures to ensure compliance. In particular, the Secretary of State will expect to be assured there are systems in place to monitor compliance and enforcement measures will be in place where there is non-compliance. Approval of the Secretary of State will be required for a selective Licensing scheme as the proposed borough-wide scheme will:
- cover more than 20% of the authority's area, and / or,
 - affect more than 20% of privately rented homes in the authority's area. Selective licensing may come into force no earlier than three months after the designation has been approved (or it falls under the general approval).
- 9.7. When fixing fees, the local housing authority may pursuant to s. 87 of the 2004 Housing Act (subject to any regulations made under subsection 5) take into account:
- all costs incurred by the authority in carrying out their functions under this Part, and,
 - all costs incurred by them in carrying out their functions under Chapter 1 of Part 4 in relation to Part 3 houses (so far as they are not recoverable under or by virtue of any provision of that Chapter).
10. Equalities implications
- 10.1. A draft Equalities Analysis Assessment has been completed and is included at Appendix 3. It will be finalised prior to the report being presented to Mayor and Cabinet for approval.
11. Climate change and environmental implications
- 11.1. The licensing scheme will complement the council's existing licensing schemes in identifying climate and environmental issues not already known such as energy performance, fly-tipping and waste management issues directly linked to properties in the PRS.
- 11.2. A coordinated approach will be taken to engage with landlords. Inspections will focus on the eradication of category 1 and 2 hazards on cold and thermal efficiency, especially for vulnerable residents.
- 11.3. Inspections of these properties will be conducted on a risk basis including analysis of potential poor standards in the stock and will work to address poor standards including damp and cold.
- 11.4. Our officers will be trained to provide advice on potential issues relating to energy efficiency, root damage, subsidence and light.
- 11.5. The council will undertake targeted work with all landlords and using landlord forums to promote energy efficiency, including engaging with landlord accreditation schemes that promote energy efficiency.
- 11.6. The council will also take steps to engage more effectively with renters across the

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borough to raise awareness of the Climate Emergency, and to flag up measures to tackle it, in particular by highlighting renters' rights with regard to the removal of category 1 hazards such as excess cold. This will be particularly important in the context of the current cost-of-living crisis.

- 11.7. The licensing and enforcement team is committed in support Lewisham's climate change initiatives by supporting the climate initiative team in:
- developing a programme to target high-risk streets and neighbourhoods with tailored advice including the publication and promotion of initiatives
 - assessing the actions and investment needed to get all buildings in the PRS to an average of EPC B and in identifying energy inefficient properties
 - exploring the potential to provide a discount on the licence fees based on their EPC rating

12. Crime and disorder implications

- 12.1. One of the objectives of the proposed schemes includes tackling ASB and crime. The scheme will identify crime and disorder issues as a result of inspections and investigation. This may result in an increase in anti-social behaviour casework, which is investigated primarily by the Council's Safer Communities service.
- 12.2. The Private Sector Housing Agency will tackle ASB and crime through active and robust enforcement working in partnership with a range of internal and external agencies including the Safer Communities service and the police, where necessary.
- 12.3. However, the council is clear that the licensing scheme confers powers on the council to take action against criminal and unlawful behaviour by landlords with regard to the management and standards of their rental properties only. This is the primary purpose of selective licensing.
- 12.4. The Council's licensing and housing enforcement service has limited powers and remit to deal with anti-social, or unlawful behaviour on the part of tenants, which, in common with any other resident of the borough is properly the purview of the Safer Communities service, or the police. Landlords are required to have an anti-social behaviour policy as part of the license conditions, and the council can remind landlords of this obligation. The licensing and housing enforcement service is committed to working closely with colleagues in all other relevant council services and other public agencies to support the delivery of safer communities in the borough.

13. Health and wellbeing implications

- 13.1. A key component of delivering the scheme outcomes is the promotion of careers in PRS housing to young people. We will create additional opportunities to promote careers in housing and environmental health to young people, to create a long-term pipeline of qualified officers. Providing new, attractive career options for young residents will have a positive impact on their health and wellbeing.
- 13.2. A poorly managed private rented sector detracts from the look and feel of streets and neighbourhoods, and can have a negative impact on residents' perception of themselves and our borough. A good quality private rented offer, which has a positive impact on neighbourhoods by creating genuinely mixed communities will encourage residents to stay in the borough.
- 13.3. Housing has a huge influence on our mental health and wellbeing. Those who are vulnerable – elderly or young, isolated, without a support network, and adults with disabilities – are more likely to be affected. Poor housing conditions have a long-term impact on health, increasing the risk of severe ill-health or disability by up to 25 per cent during childhood and early adulthood. Children living in crowded homes are more

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likely to be stressed, anxious and depressed, have poorer physical health, and attain less well at school. An improvement in property conditions is expected to lead to a general improvement in residents living conditions and their health.

14. Appendices

- 14.1. Appendix 1: Draft report of the public consultation findings by Cadence Innova
- 14.2. Appendix 2: Draft London Borough of Lewisham response to the consultation on the introduction of a selective licensing scheme
- 14.3. Appendix 3: Equalities Analysis Assessment
- 14.4. Appendix 4: Licensing conditions

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Consultation on Private Sector Property Licensing in Lewisham

Consultation Report

DRAFT

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Glossary

Term	Meaning
Additional Licensing	A licensing scheme that applies to houses and flats in multiple occupation (HMOs), let to 3 or 4 unrelated people, forming 2 or more households who share amenities such as a kitchen or bathroom.
Anti-social behaviour (ASB)	Behaviour related to a rented property that causes annoyance and irritation to neighbours and the community. Most commonly noise, litter and waste.
Barriers to housing and services	One of the government's measures of deprivation. It combines elements relating to housing affordability, overcrowding and homelessness.
Category 1 hazard (Cat 1 hazard)	A serious or immediate risk to a person's health and safety that is related to housing.
Category 2 hazard	A less serious or less urgent risk that can still be regarded as placing the occupiers' health, safety and welfare at risk.
Deprivation	Living on low income and not having the money to pay for basic requirements.
Designation	Geographical area chosen for licensing based on evidence.
DLUHC	Department for Levelling Up, Housing and Communities
HMO	A property let to 3 or more unrelated people, forming 2 or more households who share amenities such as a kitchen or bathroom
Housing Health and Safety Rating System (HHSRS)	Government prescribed system that rates housing hazards based on their risk to occupiers' health, safety, and welfare.
Indices of Multiple Deprivation	A dataset produced by the government to give a relative value to how deprived an area is, compared to the rest of the country.
Mandatory HMO Licensing	National scheme which requires landlords to have a licence to legally let their property to five or more unrelated sharers.
Private rented sector (PRS)	The portion of housing in the district that is rented from private landlords.
Privately rented	Homes rented from a private landlord.
Selective Licensing	A local scheme which requires landlords to have a licence to legally let their property to a family or two sharers.
Socially rented	Homes rented from housing associations and/or registered social landlords.

Executive Summary

Lewisham Council carried out a public consultation on their proposals to introduce a selective licensing scheme in 16 wards. The council proposed introducing selective licensing in three designations, designed to tackle the most pressing issues within each set of wards.

Designation One – High repeated antisocial behaviour (ASB) and poor housing conditions:

- Brockley
- Catford South
- Lewisham Central
- New Cross
- Perry Vale
- Rushey Green

Designation Two – Poor Housing Conditions:

- Crofton Park
- Evelyn
- Ladywell
- Lee Green
- Sydenham

Designation Three – Deprivation:

- Bellingham
- Downham
- Forest Hill
- Grove Park
- Whitefoot

To consult with landlords, tenants, residents, stakeholders and other interested parties, the council carried out an online survey. The council also hosted public meetings with landlords, tenants, residents, and landlord groups. The council used digital and print media to advertise the consultation, as well as in-person methods, following the easing of social distancing rules.

The consultation ran for 30 weeks from 20th October 2021 to 20th May 2022.

In total 1,356 responses were received from the online survey. Qualitative feedback was received at two public meetings and ten written responses from interested parties.

The consultation considered the level of support for introducing selective licensing. The consultation also looked at views on the proposed licence conditions, fees, and the respondents' perceptions of the issues in the borough.

Key Findings

	Overall	Landlords	Privately renting tenants	Other
Total consultation survey responses	1202	361	257	584
Agree with selective licensing in Designation 1	52%	13%	69%	69%
Disagree with selective licensing in Designation 1	36%	70%	17%	23%
Total consultation survey responses	1064	337	242	488
Agree with selective licensing in Designation 2	47%	10%	66%	63%
Disagree with selective licensing in Designation 2	37%	70%	28%	23%
Total consultation survey responses	1036	321	240	475
Agree with selective licensing in Designation 3	48%	11%	68%	65%
Disagree with selective licensing in Designation 3	33%	65%	23%	20%
Total consultation survey responses	1298	391	271	636
Agree that the standard property conditions should apply to all designations	64%	29%	80%	79%
Disagree that the standard property conditions should apply to all designations	30%	61%	17%	17%
Total consultation survey responses	1250	380	264	606
Agree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 & 2	59%	24%	74%	75%
Disagree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 & 2	32%	63%	20%	18%
Total consultation survey responses	1307	393	273	641
Agree that the proposed fee for selective licensing is reasonable	44%	7%	47%	50%
Disagree that the proposed fee for selective licensing is reasonable	47%	90%	36%	40%
Total consultation survey responses	1293	387	273	633
Agree that the proposed discounts for selective licensing are reasonable?	37%	13%	46%	47%
Disagree that the proposed discounts for selective licensing are reasonable?	47%	73%	34%	37%

Introduction

Background

According to the Office for National Statistics (ONS) and the Housing Stock and Stressors report findings, the private rented sector (PRS) in Lewisham has grown from 24% in 2011 to 31% in 2021; an increase of almost 30% over 10 years. This shift has come as a result of population growth in tandem with a limited supply of new and affordable homes and therefore has resulted in soaring house prices. The Private Rented Sector has helped address the housing shortage and now 39,674 of Lewisham's 128,798 residential dwellings are privately rented.

The increased demand for privately rented homes has however also seen an increase in rents being charged in the borough, resulting in residents having to compromise on property standards and their health and safety to access affordable housing. The English Housing Survey (Dec 2020) indicates that 12% of private rented dwellings in England had at least one Category 1 hazard; a hazard that poses a serious or immediate risk to a person's health and safety. In stark contrast, 22.7% of Lewisham's PRS properties were found to have at least one category 1 hazard.

Over half of the residential properties in the borough were built pre-Second World War (Housing Stock and Stressors Report, Metastreet, 2021). Housing conditions tend to be worse in older properties and pose greater risk to the health and safety of its inhabitants. For example, the HHSRS Operational Guidance (2006) by the Office of the Deputy Prime Minister, stressed that there is a greater risk of winter deaths in dwellings with low energy efficiency ratings and this correlates with the age of the property; dwellings built after 1980 are more energy efficient and are therefore safer. Wards comprising mainly of older properties are inclined to have more hazards, such as excess cold, fire and electrical issues, damp and mould.

The national Mandatory HMO licensing scheme came into operation in April 2006. Following the end of the previous Additional HMO Licensing scheme in February 2022, a new Additional scheme came into force on Tuesday 5 April 2022.

The Council previously considered introducing a selective licensing scheme; however due to the pandemic, plans were put on hold. As lockdown restrictions came to an end, the council reviewed housing conditions in the borough once again, developed plans as to how a selective licensing scheme could operate in the borough and consequently launched a public consultation to gain feedback on the proposals.

Proposals

Legislation dictates that a selective licensing scheme can only be applied to areas containing a proportion of properties in the PRS **exceeding the national average of 19%**. The PRS in Lewisham is distributed across all 18 wards: where the percentage of PRS properties in each ward ranges from between 41.1% (Lewisham Central) to 23.8% (Downham). Therefore, all of Lewisham's wards have a higher PRS percentage than the national average (19% English Housing Survey Headline Report, 2020-21).

Furthermore, according to the Housing Stock and Stressors Report (2021) there are 8,995 private rented properties in Lewisham that are likely to have at least 1 serious housing hazard (Category 1, HHSRS). This represents 22.7% of the PRS stock. PRS properties with serious hazards are distributed across the borough.

The Selective Licensing Scheme

The council has proposed to introduce a five-year selective licensing scheme in three areas /designations comprising 16 wards based on evidence gathered regarding issues associated with the PRS. The wards have been allocated across the designations in consideration of the differing levels of ASB, poor property conditions and deprivation; these are summarised in Figure 1 below.

The wards of Telegraph Hill and Blackheath are not included in any of the designations as there was not sufficient evidence.

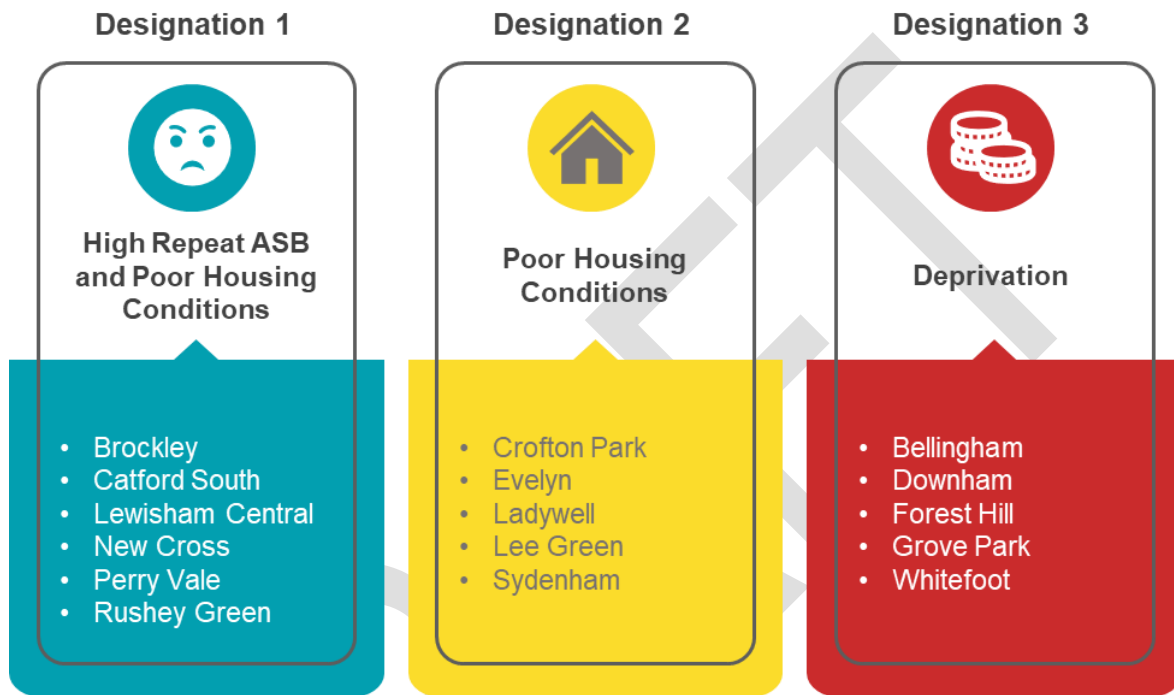


Figure 1: Designation of wards for a proposed selective licensing scheme in Lewisham.

Due to the size of the potential scheme (which would be over 20% of the geographical area of the borough, and over 20% of the private rented sector in the borough), the council will need to seek approval from the Department of Levelling Up, Housing and Communities (DLUHC) should the scheme be agreed by Lewisham Council's Mayor and Cabinet Committee. If implemented, all properties in the designated areas that are rented to single families (or two sharers) will need to have a licence to be legally let.

The council also asked for views on the proposed fees and discounts. The proposed licence fee for selective licensing scheme of £640 for a five-year licence. The proposed discounts are a discount of £128 for accredited landlords and landlords who apply during the "early bird" period, and a discount of £320 for eligible charities. The council also asked for views on the proposed licence conditions. The proposed licence conditions outline the responsibilities of the licence holder, and covers the advice and documentation that must be supplied to tenants, health and safety conditions, and tenancy management including anti-social behaviour, repairs, and refuse management.

Public consultation

The consultation ran for 30 weeks from 20th October 2021 to 20th May 2022. To capture as much feedback as possible from landlords, tenants, residents and other stakeholders the council used several approaches to promote the consultation across the borough, and outside the borough. Activities for the consultation, including releasing new communications and publicity, were paused during the pre-election period of (21st March 2022 to 6th May 2022), in the lead up to the 2022 local elections.

Communication channels

The consultation and survey were initially hosted on the Commonplace platform, with three surveys, one for each designation, to gather the feedback from stakeholders. The consultation page also had the supporting evidence for the designations, and the proposed licence conditions as well as information about the proposed fees and discounts. The initial consultation surveys were promoted and advertised by:

- Council e-newsletters: resident newsletter (approx. 28,000), staff newsletter (approx. 2,500) and business newsletter (approx. 4,600)
- Features in Lewisham Life magazine – distributed to 150,000 households in Lewisham.
- Posters and leaflets distributed to key community centres, health centres, resident groups, theatres, libraries
- Direct email to more than 400 local community groups/churches etc.
- Consultation info distributed via Lewisham Homes channels
- Adverts with links directly to the consultation on London Property Licensing (LPL), a website dedicated to providing information about property licencing schemes in each London Borough. The adverts ran from 12th November 2021 to 3rd February 2022 including:
 - LB Lewisham licensing consultation banner advert on the LPL homepage and LB Lewisham pages
 - A news article in LPL news section
 - The consultation was listed on the LPL events page
 - A high-profile banner headline attached to a rotating image at the top of the LPL home page
 - During the consultation period, the webpages on the London property Licensing website that promoted the licensing consultation exercise were viewed 6,930 times and the LB Lewisham was the third most viewed borough page.
 - The licensing consultation was promoted in the LPL newsletters distributed on 30/11/2021, 17/12/2021 and 31/01/2022. Each newsletter was sent to between 3,293 and over 3,326 people.
 - The licensing consultation was promoted in posts on the LPL Facebook page on 16/12/2021 and 13/01/2022, and the LPL LinkedIn page on 16/12/2021 and 12/01/2022.
 - Tweets about the licensing consultation were published on the LPL Twitter Feed (@lplicensing) every 15 to 17 days, timed to cover a variety of morning, afternoon and evening posts, between 15/11/2021 and 27/01/2022. During this period, the @lplicensing twitter feed had between 2,284 and 2,299 followers
- Direct email to residents who had previously completed consultations on Commonplace
- Out-of-Home advertising boards and screens poster campaign for two weeks on 40 sites on high streets and roadsides across the borough.

Following a review of the consultation responses and consultation page in January 2022, the survey was consolidated into one survey to make it easier for respondents and for the council to gather feedback on all the designations. This was moved to the council website from the Commonplace platform. The evidence pack was also reviewed and edited to make the designations and supporting evidence clearer. This renewed evidence base, as well as the proposed licence conditions and information about the proposed fees and discounts were also available on the council website, on the same page as the survey.

Webpages and social media communications

14 January - web page created and posted

17 January - organic social media posts started. The organic social media posts campaign had a reach of 78,684, 1880 engagements and 234 clicks.

- Twitter posts on 17th Jan, 25th Jan, 1st Feb, 7th Feb, 11th Feb, 14th Feb, 17th Feb, 23rd Feb, 7th Mar, 13th Mar, 9th May, 12th May
- Facebook posts on 17th Jan, 25th Jan, 1st Feb, 11th Feb, 14th Feb, 17th Feb, 23rd Feb, 7th Mar, 13th Mar, 9th May, 12th May
- Instagram posts on 25th Jan, 1st Feb, 7th Feb, 23rd Feb (Instagram reel)
- Next door posts on 15th Feb

17 January - details added to London Borough of Lewisham's homepage

18 January - alerts added to various housing web pages

26 January - shared on Yammer

7 February - social media assets updated

9 May - CAN digital advertising campaign started, running from 9th May to 20th May which resulted in 185,427 impressions, 2,385 clicks to the consultation page with an average click-through-rate of 1.29% which is higher than the industry average for display ads of 0.35%. The digital campaign placed adverts on websites and social media pages related to Lewisham and the private rented sector, including:

- Facebook
- Instagram
- Tamilwin.com
- Zoopla
- Ghanaweb.com
- Lankasri.com
- The Sun
- Gazeta.pl
- Novini.bg
- Daily Mail
- Mirror
- Gumtree
- Mumsnet
- Express

Targeted emails

28 January - shared in Chief Executive all staff email

27 January – Shared in business newsletter (approx. 4,600 recipients) and resident newsletter (approx. 28,000 recipients)

15 February - email to 656 HMO landlords

Paper-based communications

18 February - hard copy surveys sent to Lewisham libraries

March – Featured in Lewisham Life magazine’s March edition - distributed to 150,000 households in Lewisham.

March – Consultation advertised in the Council Tax mail-out – sent to approx. 135,000 households in Lewisham.

6 May - Inclusion in Lewisham Homes newsletter to tenants and leaseholders - 10,400 recipients

Public meetings and in-person communications

2 March – Public Meeting held via zoom attended by 18 people

18 March – Lewisham Council staff visited Lewisham foodbank with information about the consultation and paper copies of the survey

16 May – Public Meeting held with the NRLA to provide information about the consultation, via zoom, attended by 15 people

20 May - Lewisham Council staff visited Lewisham foodbank with information about the consultation and paper copies of the survey

Consultation methods

Online surveys

From 20th October 2021 to 13th January 2022, the consultation ran three surveys, one for each designation, which was available to the public via the Commonplace website. There were 221 responses to the survey for Designation 1, 90 responses to the survey for Designation 2, and 54 responses to the survey for Designation 3.

Following a review of the consultation responses, the council created a single overall survey which would cover all three proposed designations, with the aim that the single survey would be quicker and easier for respondents to complete. The updated, single survey was available from 14th January on Commonplace, and was moved to the Council’s website on 21st January 2022. The consultation was extended to 20th May 2022 give more stakeholders time to reply. Paper copies of this survey were also available upon request and printed copies were used to gather feedback at food banks.

The final survey received 991 responses, of which 14 were paper copies.

Public forums

The Council held two public meetings to provide more information about the proposed scheme and to gather feedback from stakeholder who may be impacted by licensing. The public meetings were held over Zoom, and the council presented information about the

proposed schemes, followed by a question-and-answer session. The first meeting was held on 2nd March 2022 and was attended by 18 people. The second meeting was held on 16th May 2022, and was aimed at engaging with landlords and was organised with the National Residential Landlords Association and was attended by 16 people. The feedback from meeting attendees has been analysed below.

Other written feedback

The council accepted feedback on the proposed licensing schemes by email or written response. The feedback in the ten emails received has been analysed below and the written responses received can be found in the appendices.

Consultation results

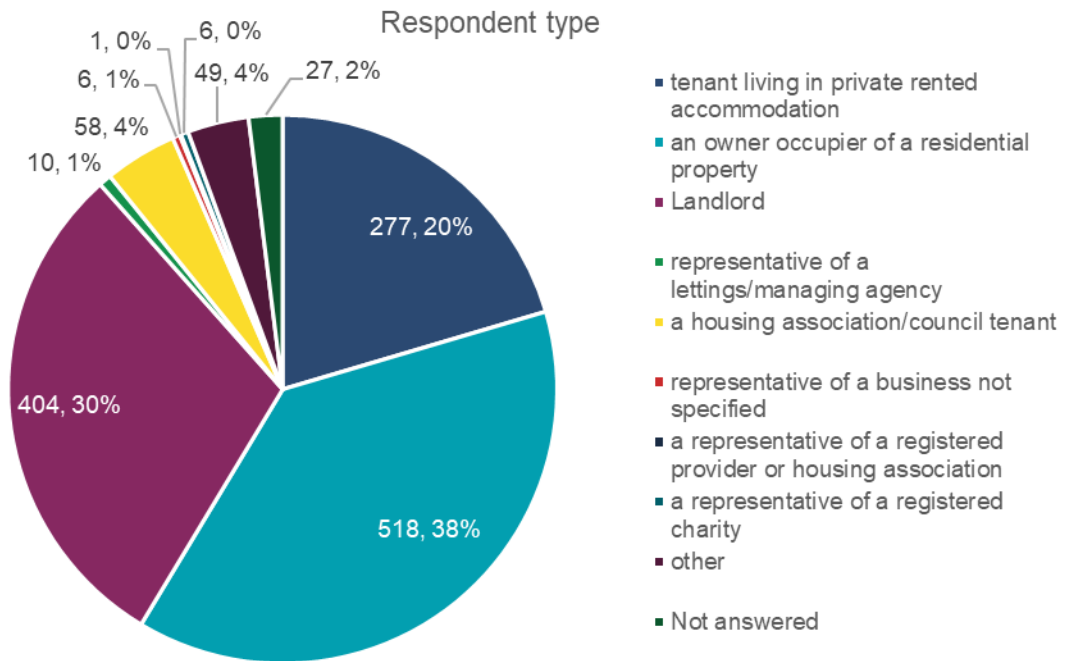
The online surveys

This section of the report presents the results of the surveys which ran from 20th October 2021 to 20th May 2022. There were 1,356 responses to the surveys. Where the questions were the same across all the surveys, they will be shown as one result in the analysis below. Where questions were asked in the initial surveys or in the final survey, this will be stated and the results from that question presented below.

In the following analysis, the percentages are based on the answers to the question and will state the number of responses to the question.

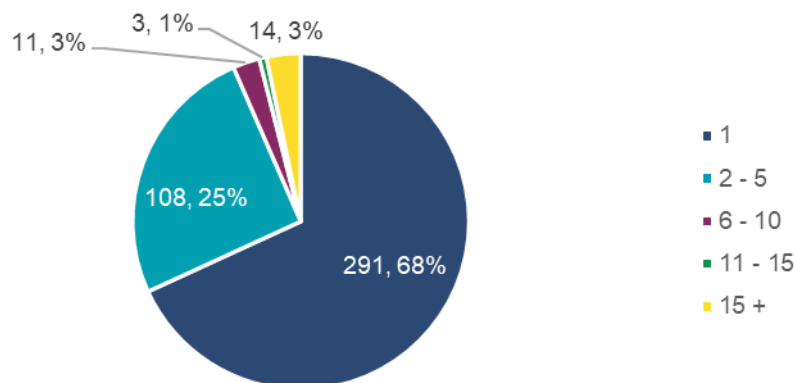
Respondents

All respondents to the consultation were categorised into the following stakeholder groups. Where respondents said they were both a landlord and another stakeholder group (for example, a landlord and a resident), they have been categorised as a landlord for the analysis of the consultation responses. All 1,356 respondents were categorised. The range of respondents to the consultation show a good representation of views from different stakeholder groups



Landlords and managing agents responding to the survey were asked how many properties they owned or managed in Lewisham. 427 respondents answered this question. The overall majority, 68% (291) stated that they owned or managed one property in Lewisham.

If you are a landlord or a managing agent of private rented homes, how many do you own or manage in Lewisham?



Views on the proposed selective licensing scheme

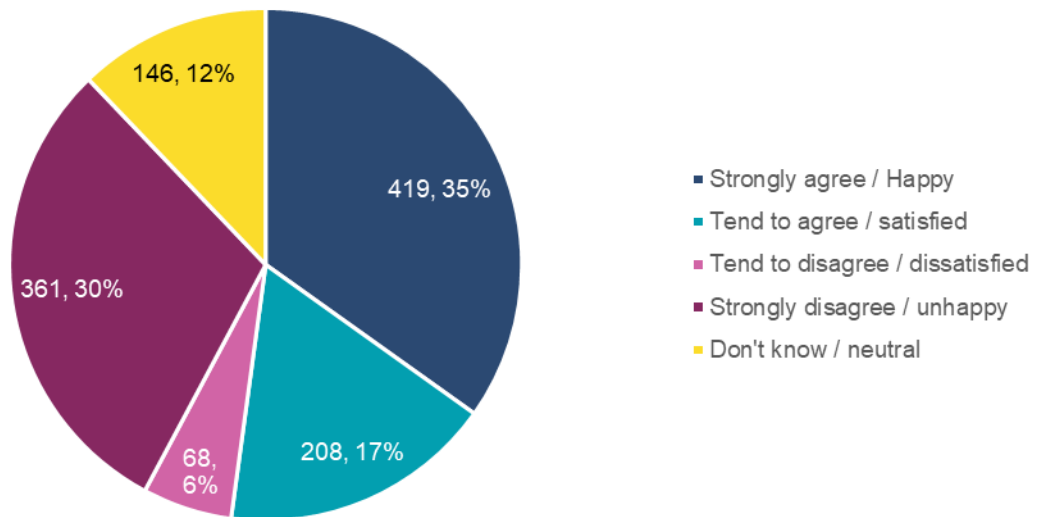
The Council is proposing to introduce a selective licensing scheme which would target privately rented homes in 16 wards let to single family households, two sharers or one person. These would be in three designations, as outlined in the Executive Summary.

Proposal to introduce selective licensing in designation 1.

Designation 1 would cover Rushey Green, Brockley, New Cross, Catford South, Lewisham Central and Perry Vale wards on the basis of high repeat ASB and poor housing conditions.

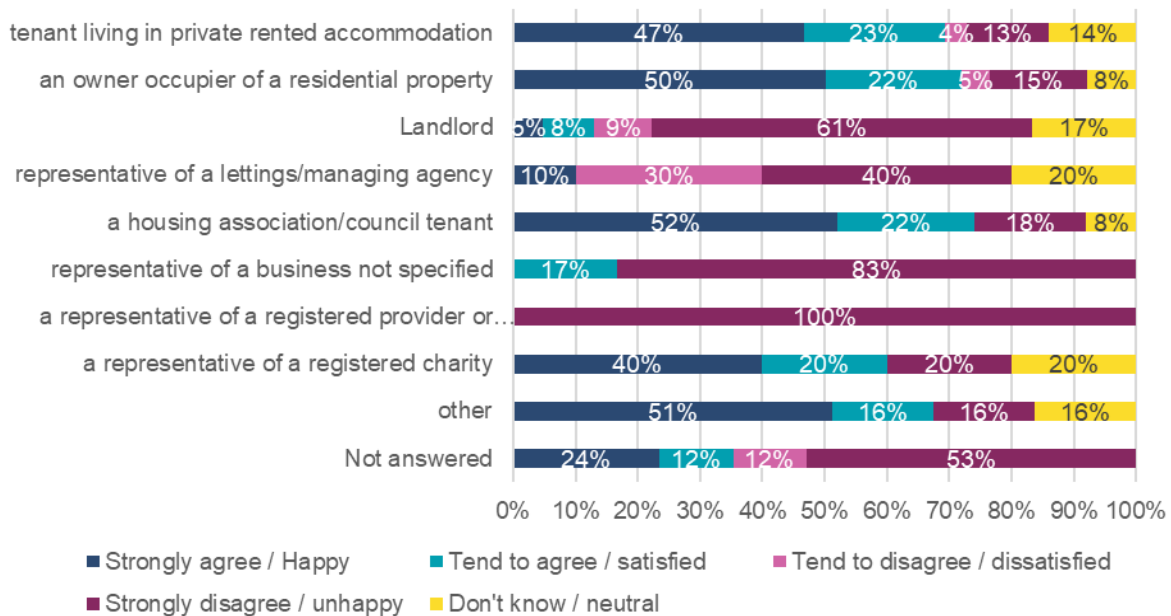
1,202 respondents answered the question regarding their agreement with the proposed scheme for designation 1. The overall majority, 52% (627) agree with the proposed scheme designation. 36% (429) disagree.

To what extent do you agree or disagree with the proposal to designate the specified wards in designation 1 for selective licensing?



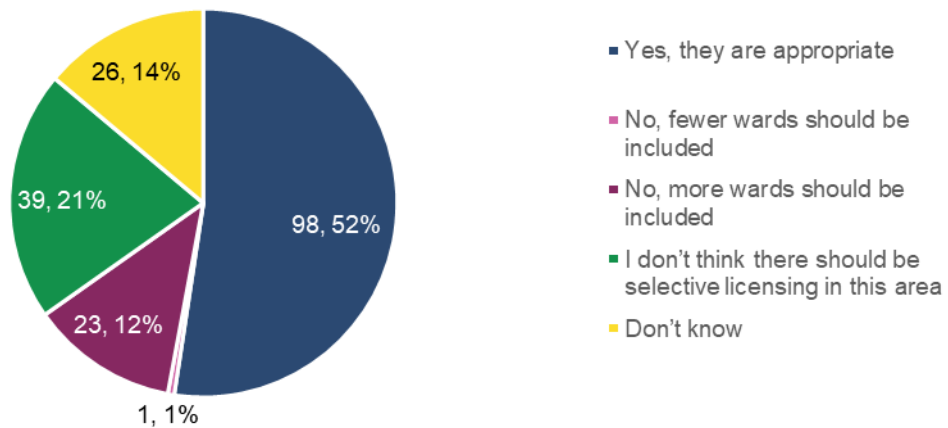
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with around 70% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with around 70% disagreeing

To what extent do you agree or disagree with the proposal to designate the specified wards in designation 1 for selective sicensing?



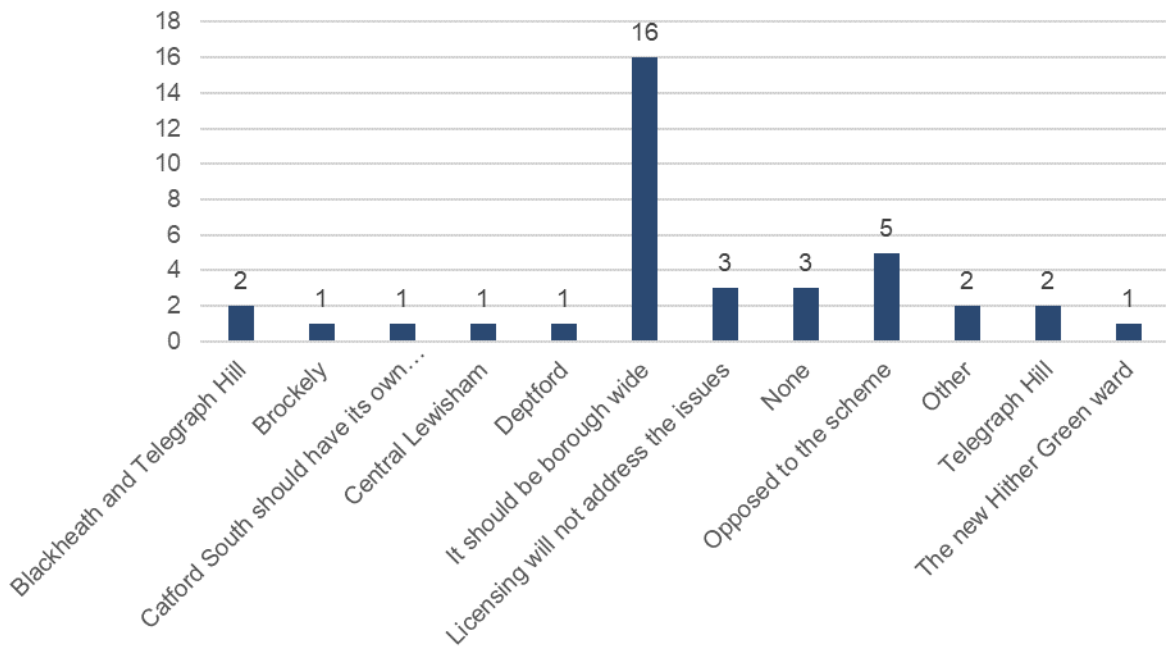
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 187 respondents answered this question for designation 1. 52% (98) responded that “yes, they are appropriate”.

Do you think the proposed wards for designation 1 are appropriate?



Respondents to the initial survey for designation 1 were asked to suggest of which wards in Lewisham should be included or excluded from the designation. In total there were 38 comments from respondents. The top responses were that the designation should be borough-wide, followed by comments opposing the proposed scheme. All representations to the consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

Which of the wards in Lewisham should be included or excluded from designation 1?

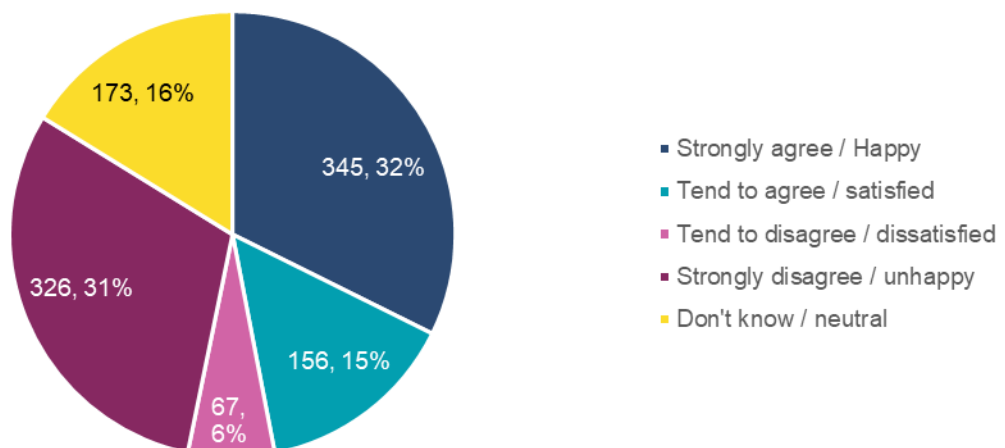


Proposal to introduce selective licensing in designation 2.

Designation 2 would cover Evelyn, Ladywell, Lee Green, Crofton Park and Sydenham wards on the basis of poor housing conditions.

1,067 respondents answered the question regarding their agreement with the proposed scheme for designation 2. 47% (501) agree with the proposed scheme designation. 37% (393) disagree.

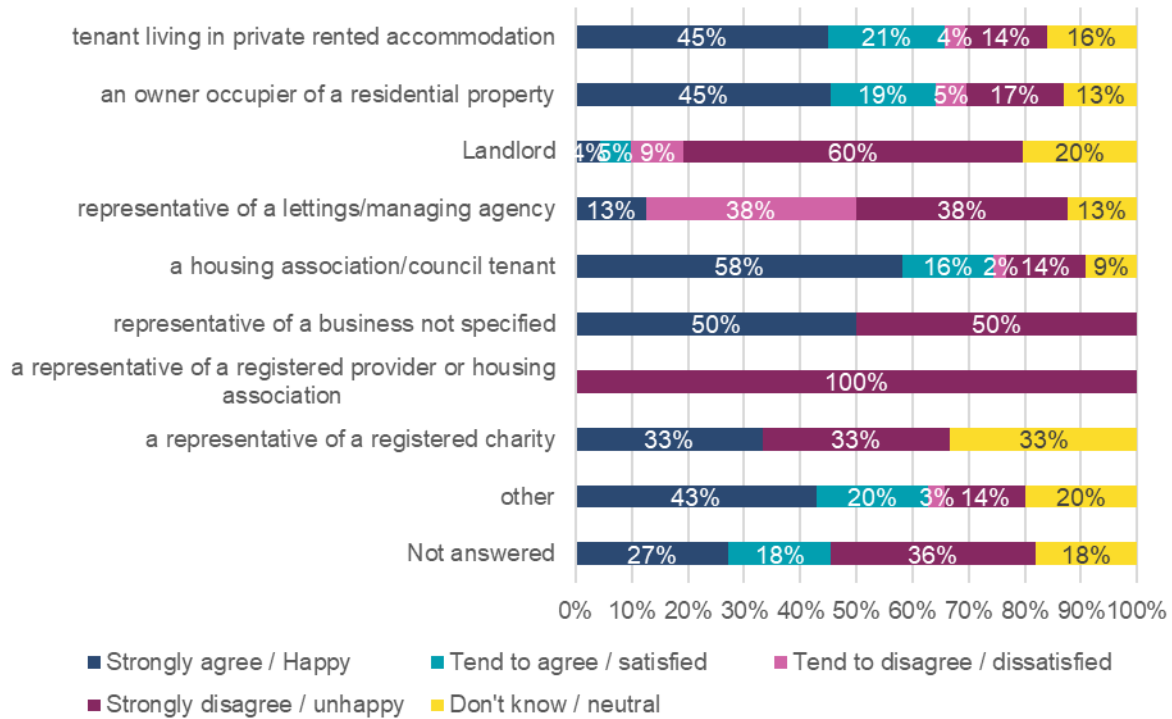
To what extent do you agree or disagree with the proposal to designate the specified wards in designation 2 for selective licensing?



Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with over 60% of each group

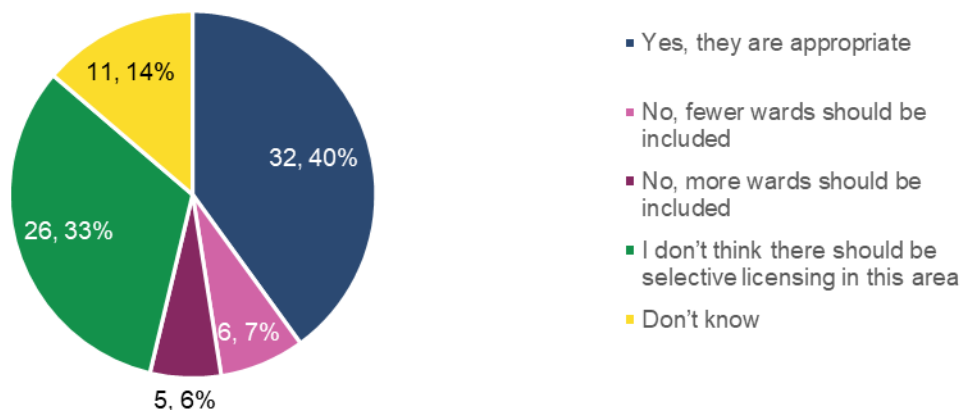
agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with around 60% disagreeing

To what extent do you agree or disagree with the proposal to designate the specified wards in designation 2 for selective licensing?



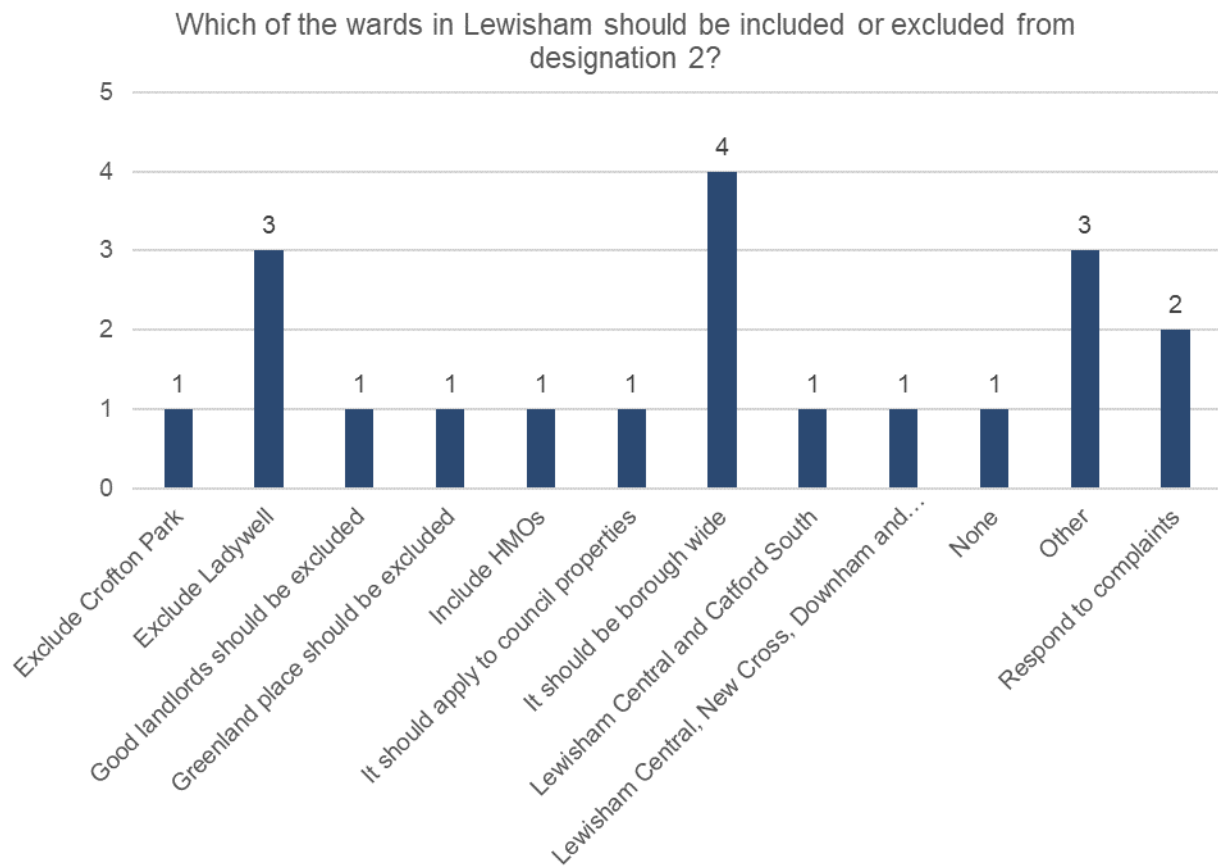
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 80 respondents answered this question for designation 2. 40% (32) responded that “yes, they are appropriate”.

Do you think the proposed wards for designation 2 are appropriate?



Respondents were to the initial survey for designation 2 asked to suggest which wards in Lewisham should be included or excluded from the designation. In total there were 20 comments from respondents. The top responses were that the designation should be borough-wide, followed by suggesting that Ladywell be excluded. All representations to the

consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

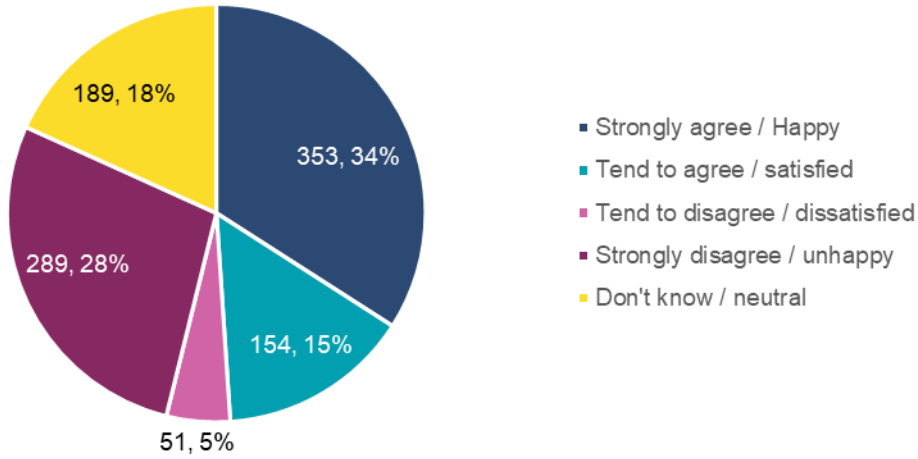


Proposal to introduce selective licensing in designation 3.

Designation 3 would cover Downham, Bellingham, Whitefoot, Forest Hill and Grove Park on the basis of deprivation.

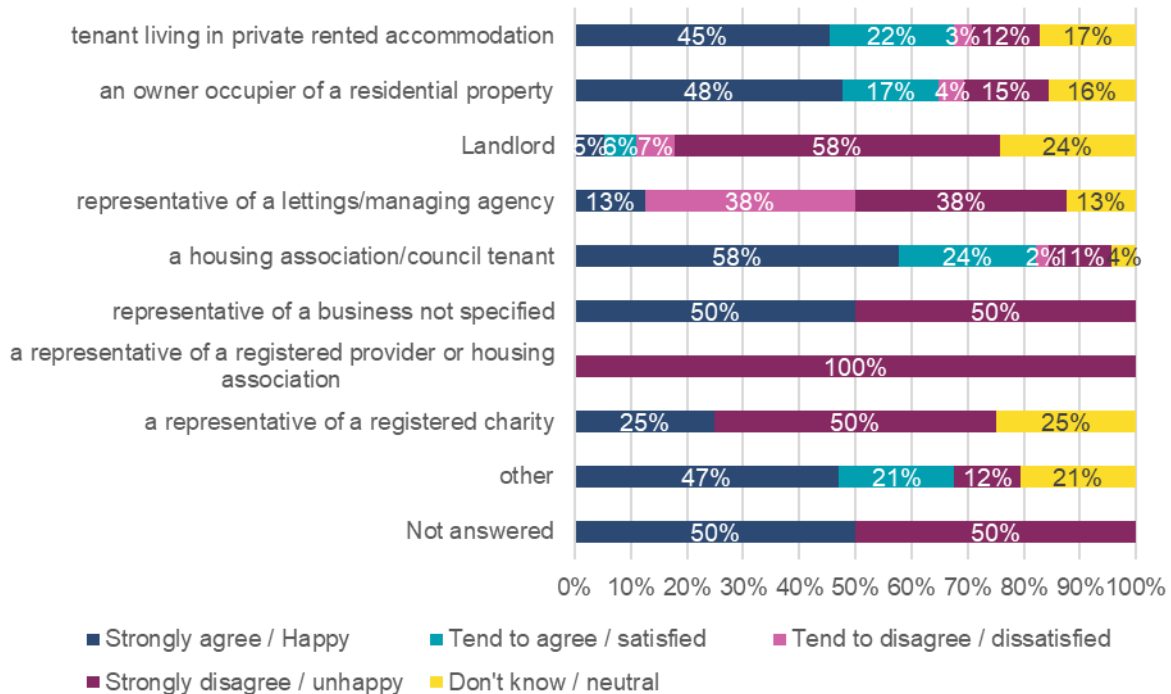
1,036 respondents answered the question regarding their agreement with the proposed scheme for designation 3. 49% (507) agree with the proposed scheme designation. 33% (340) disagree.

To what extent do you agree or disagree with the proposal to designate the specified wards in designation 3 for selective licensing?



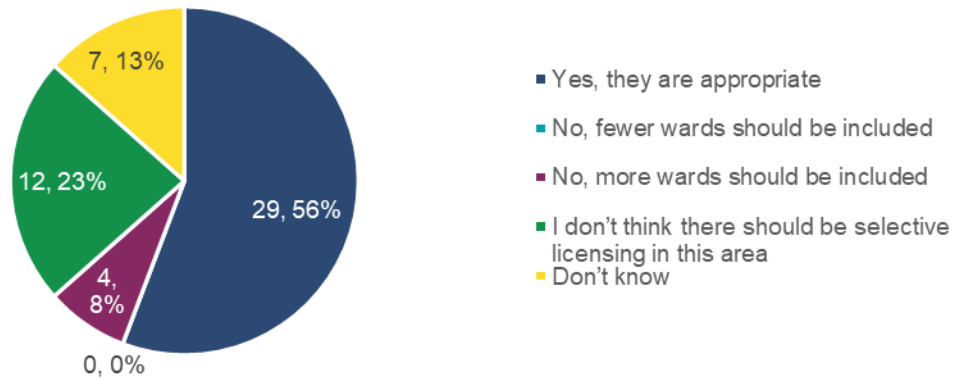
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with over 60% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 60% disagreeing

To what extent do you agree or disagree with the proposal to designate the specified wards in designation 3 for selective licensing?



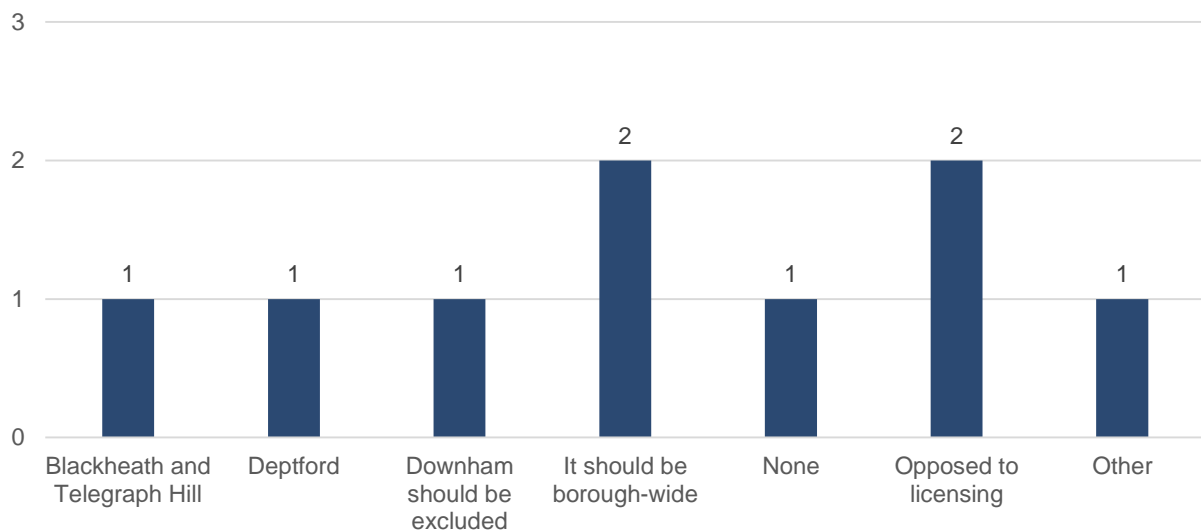
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 52 respondents answered this question for designation 3. 56% (29) responded that “yes, they are appropriate”.

Do you think the proposed wards for designation 3 are appropriate?



Respondents were to the initial survey for designation 3 asked to suggest of which wards in Lewisham should be included or excluded from the designation. In total there were 9 comments from respondents. The top responses were that the designation should be borough-wide, followed by comments opposed to the proposed scheme. All representations to the consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

Which of the wards in Lewisham should be included or excluded from designation 3?

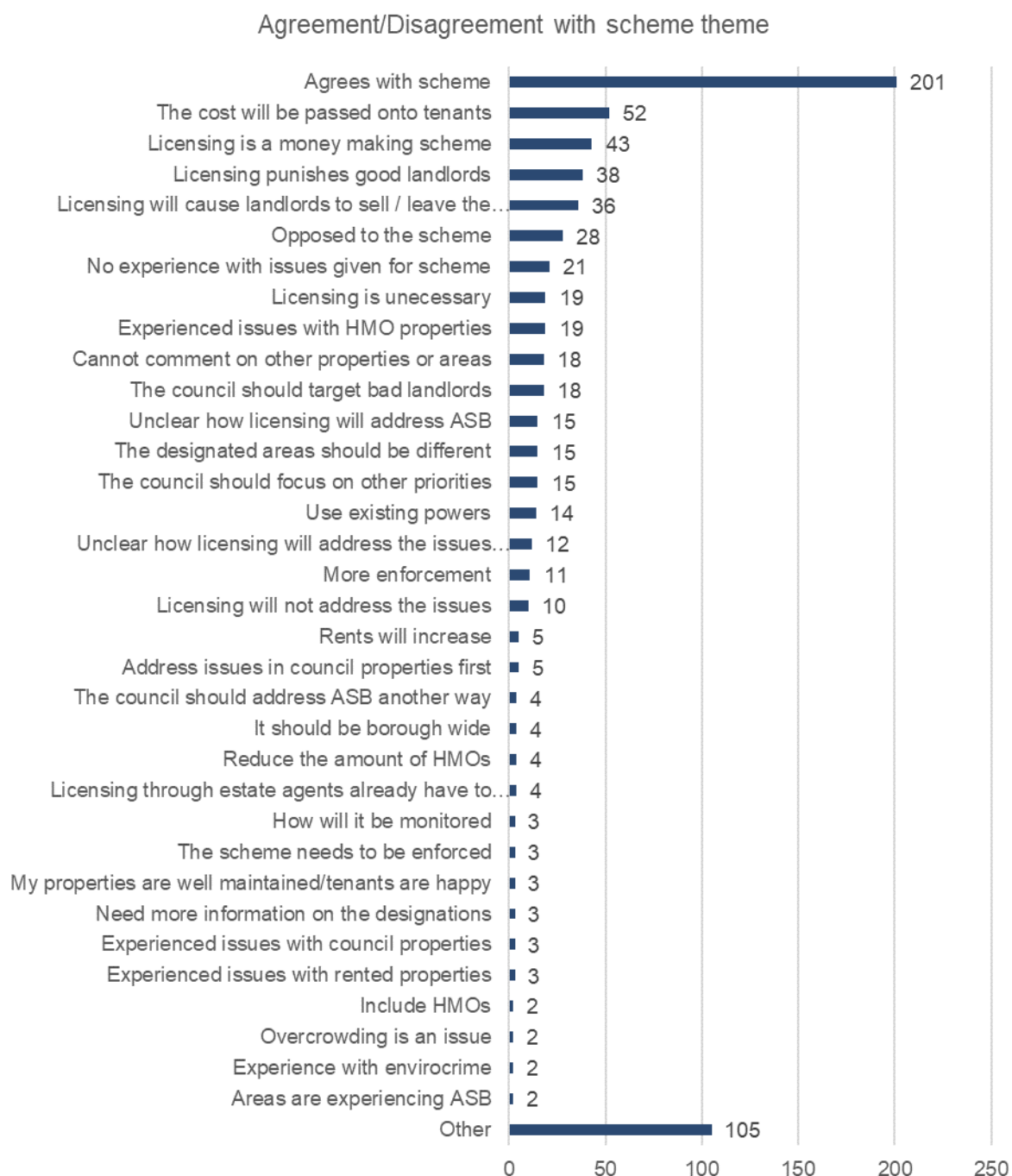


Reasons for opposing or supporting the introduction of selective licensing schemes.

Respondents were given the opportunity to explain their responses as to why they agreed or disagreed with the proposed selective licensing schemes. For all the free text responses throughout the report, each response was looked at and categorised into a theme. Comments that were not relevant to the question were excluded from this analysis.

In total there were 742 comments from respondents, 286 from landlords, 105 from private tenants, 273 from owner occupiers and 78 from other respondent types. Themes which received fewer than two comments were grouped under 'other'.

Key themes were “agrees with the scheme”, “the cost will be passed onto tenants” and “licensing is a money-making scheme”. All representations to the consultation will be considered in line with the Housing Act 2004 and the council’s consideration published as an annex to this consultation.

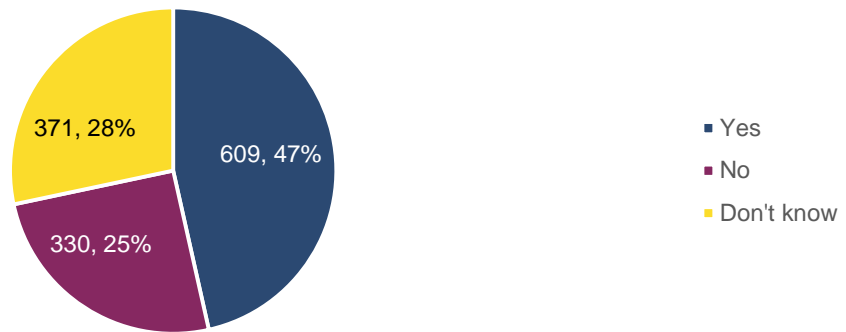


Views on alternatives to licensing

Respondents were asked if they thought that the Council should consider alternatives to a selective licensing Scheme to effectively regulate private rented property conditions and management, help tackle anti-social behaviour and raise the living conditions of the most deprived in Lewisham.

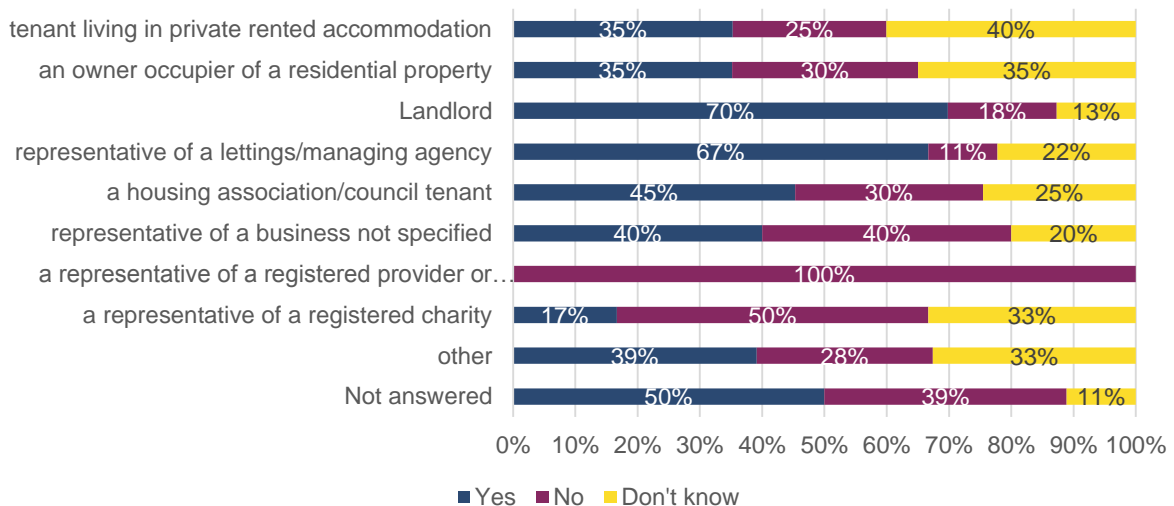
1,310 respondents answered this question. 47% (609) respondents answered yes, the council should consider alternatives. 25% (330) answered no, and 28% (371) answered “Don’t know”

Do you think the Council should consider alternatives to a selective licensing scheme to effectively regulate private rented property conditions and management, help tackle anti-social behaviour and raise the living conditions of the most deprived in Lew



Looking at the responses by stakeholder group, almost all groups had a significant proportion who responded that the Council should consider alternatives to selective licensing.

Do you think the Council should consider alternatives to a Selective Licensing Scheme to effectively regulate private rented property conditions and management, help tackle anti-social behaviour and raise the living conditions of the most deprived in Lew

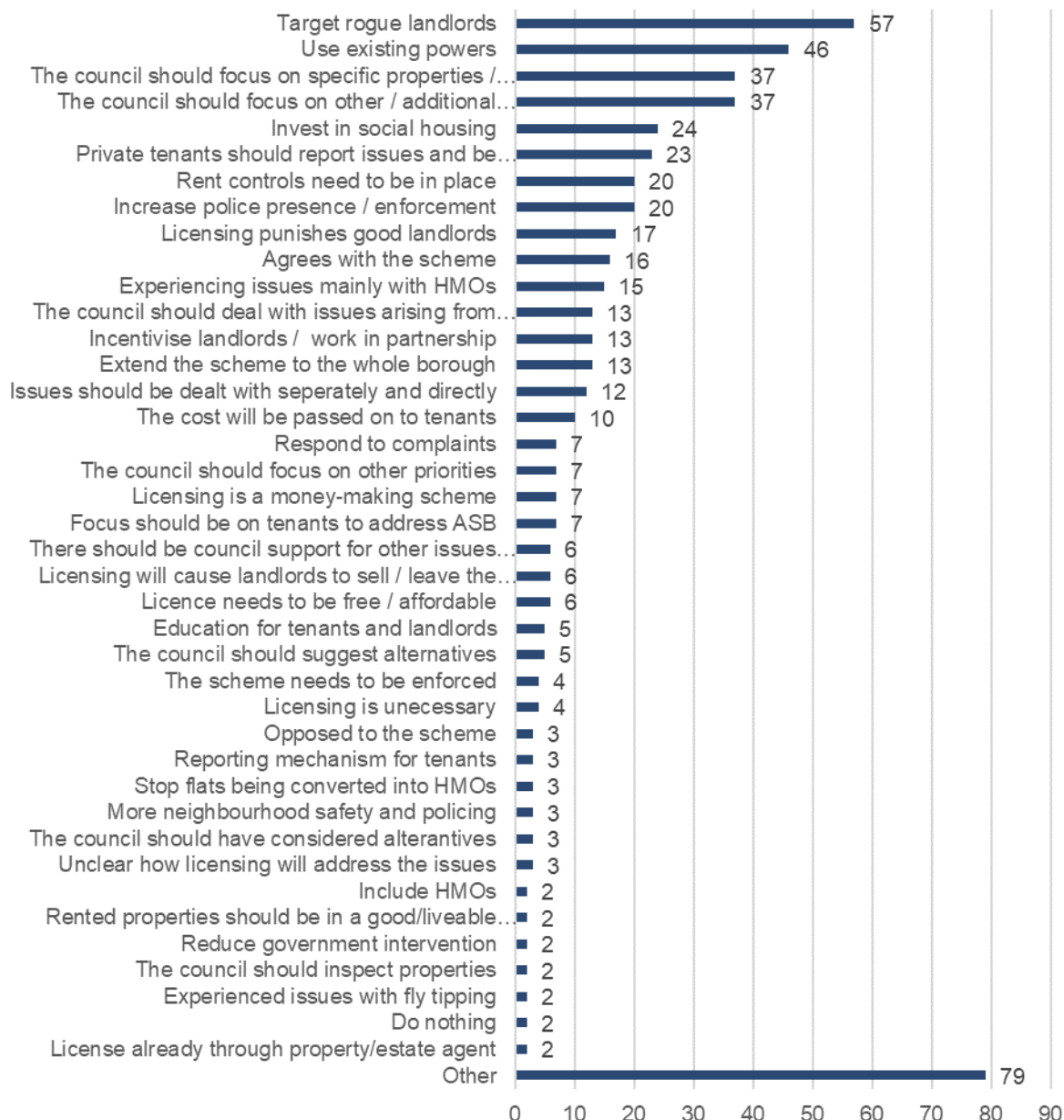


Respondents were asked what alternatives they think the Council should consider and indicate whether they would be relevant for the entire area covered by the proposed selective licensing scheme or a specific part of it.

In total there were 548 comments from respondents, 265 from landlords, 77 from private tenants, 149 from owner occupiers and 57 from other respondent types. Themes which received fewer than two comments were grouped under ‘other’.

Key themes for alternatives to selective licensing are that the council should “target rogue landlords”, that “the council should use their existing powers to address issues” and that “the council should focus on specific properties / types of properties”. All representations to the consultation will be considered in line with the Housing Act 2004 and the council’s consideration published as an annex to this consultation.

What alternatives do you think the Council should consider to a Selective Licensing scheme?



Views on the proposed selective licensing conditions

The consultation asked respondents for their views on the proposed set of licence conditions, for both selective and additional licensing schemes. The proposed licence conditions outline the responsibilities of the licence holder, and covers the advice and documentation that must be supplied to tenants, health and safety conditions, and tenancy

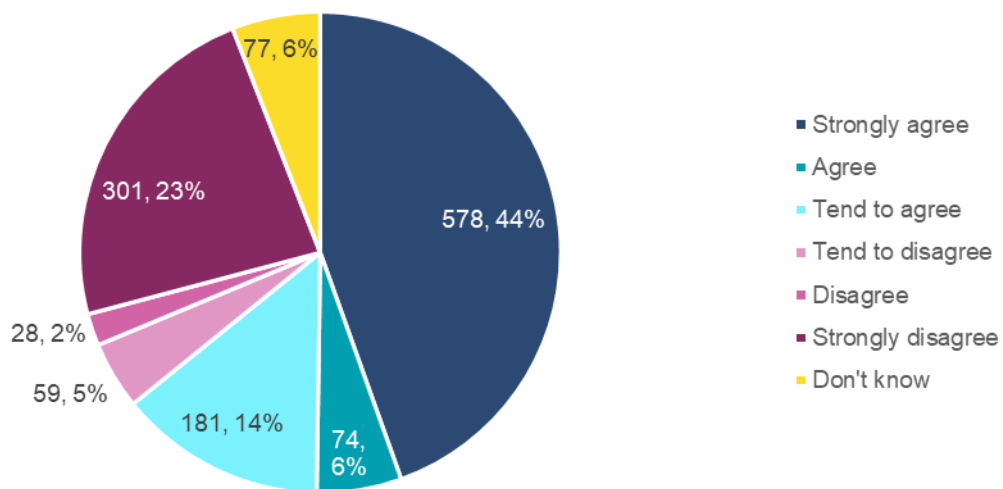
management including anti-social behaviour, repairs, and refuse management. Further information about the licence conditions was provided within the consultation documents.

Views on the standard property conditions

The Council consulted on the proposal to apply a standard set of property conditions to all three designations.

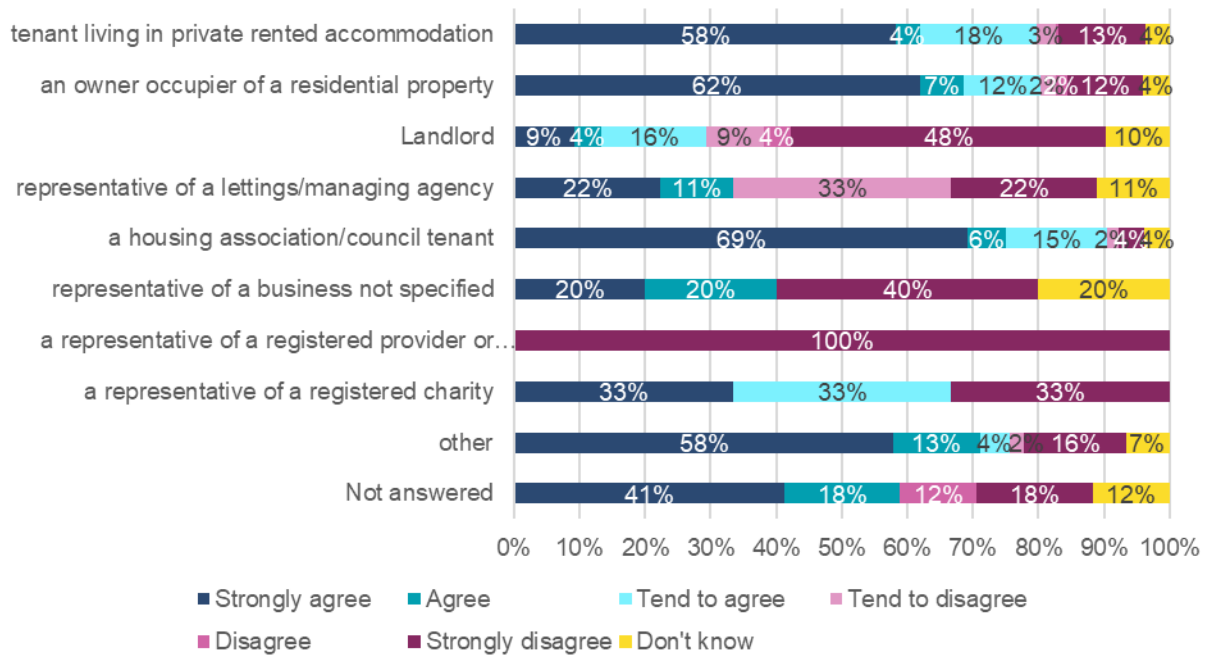
1,298 respondents answered the question regarding their agreement with the standard property conditions being applied to the designations. 64% (833) of respondents agreed and 30% (388) disagreed.

Do you agree that Lewisham's standard property conditions should be applied to the designations?



Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with around 80% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 50% disagreeing

Do you agree that Lewisham's standard property conditions should be applied to the designations?

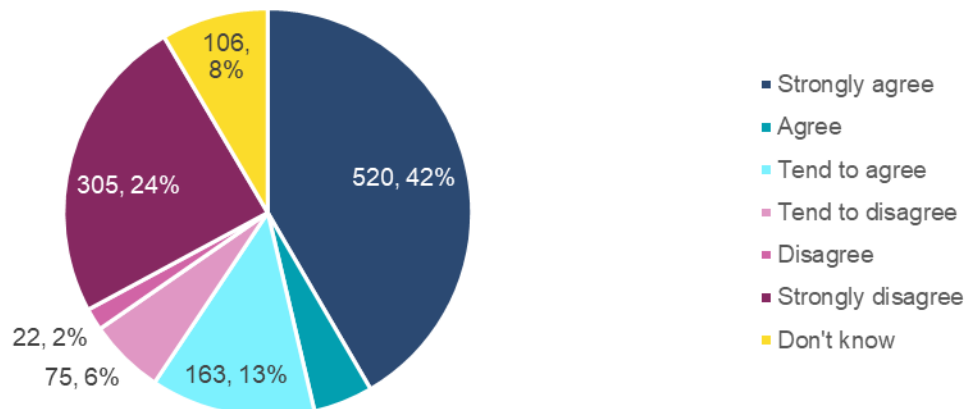


Views on the supplementary anti-social behaviour (ASB) and poor housing conditions

The Council consulted on the proposal to apply a supplementary set of property conditions to address ASB and poor housing conditions to designations 1 and 2.

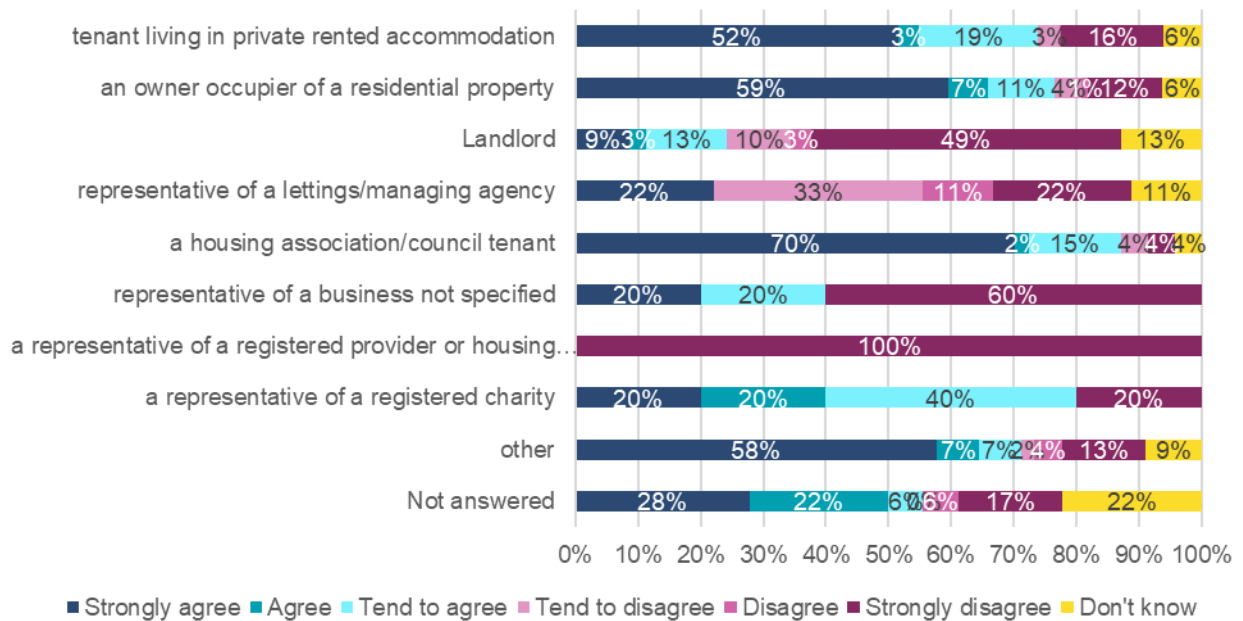
1,250 respondents answered the question regarding their agreement with the standard property conditions being applied to the designations. 60% (742) of respondents agreed and 32% (402) disagreed.

Do you agree that the supplementary anti-social behaviour and poor housing conditions should be applied to designation 1 & 2?



Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with over 70% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 60% disagreeing

Do you agree that the supplementary anti-social behaviour and poor housing conditions should be applied to designation 1 & 2?

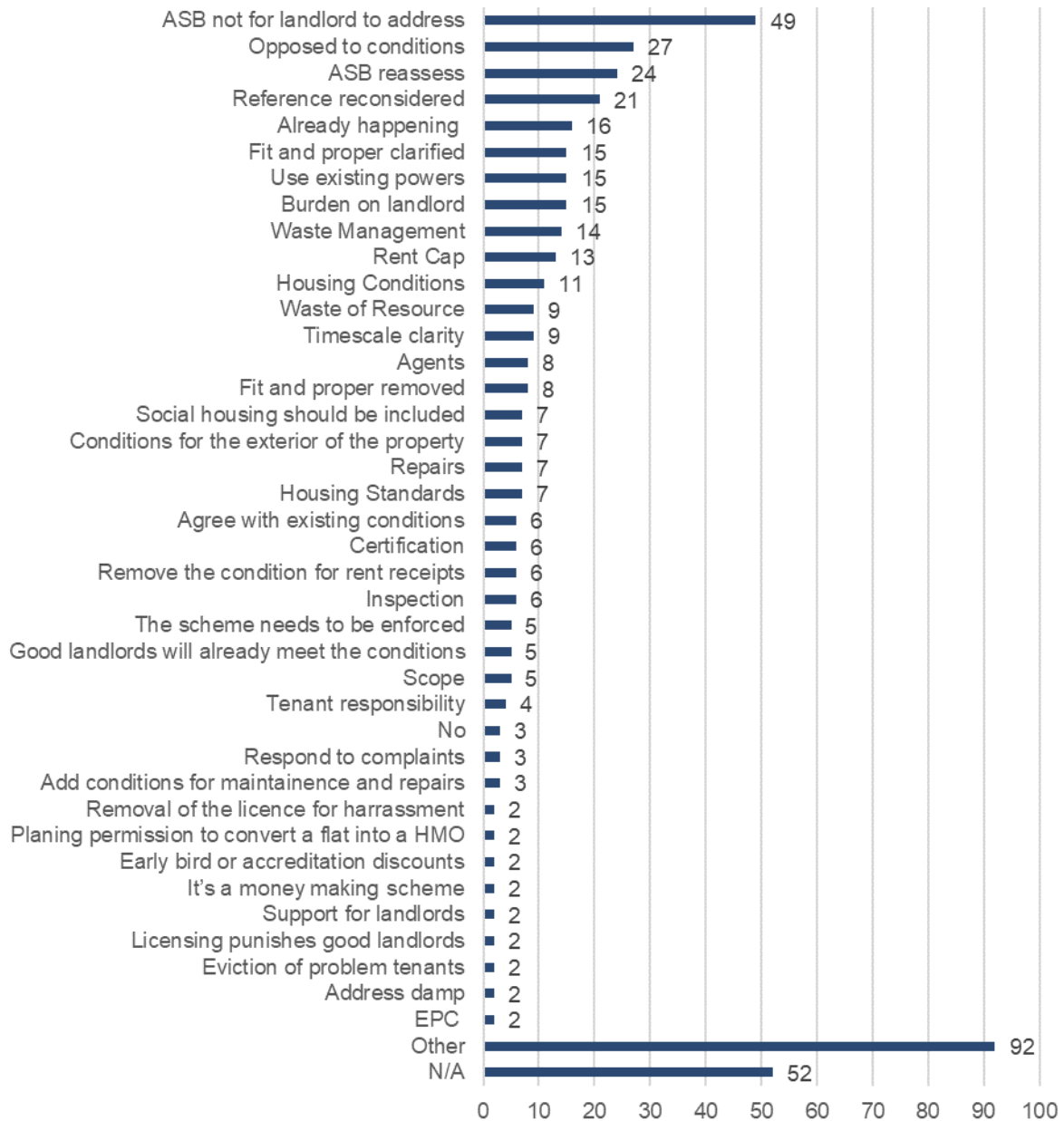


Views on the proposed conditions

Respondents were asked if they thought that any conditions should be included or removed. In total there were 496 comments from respondents, 190 from landlords, 83 from private tenants, 172 from owner occupiers and 51 from other respondent types. Themes which received fewer than two comments were grouped under 'other'.

Key themes for conditions that should be included or removed are that "ASB is not for landlords to address", "opposition to the conditions" and that the ASB conditions should be reassessed. All representations to the consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

Are there any conditions you think should be included or removed?



Views on the proposed fee and discounts

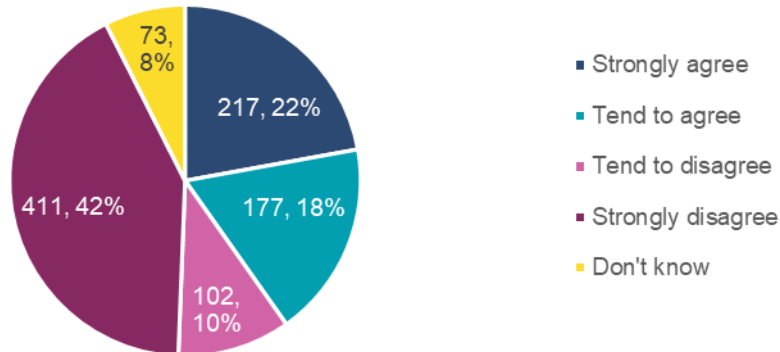
The consultation asked respondents for their views on the proposed licence fees for the proposed selective licensing scheme, and the proposed discounts. Information about the proposed licence fees and discounts was provided within the consultation documents. The questions regarding the fees and discounts were phrased differently and had different answer options in the initial surveys (one for each designation) than in the final overall survey. Therefore, the results of these questions are presented separately below.

Views on the proposed fee

Respondents to the final, overall survey were asked how reasonable they feel the proposed licence fee for selective licensing scheme of £640 for a five-year licence.

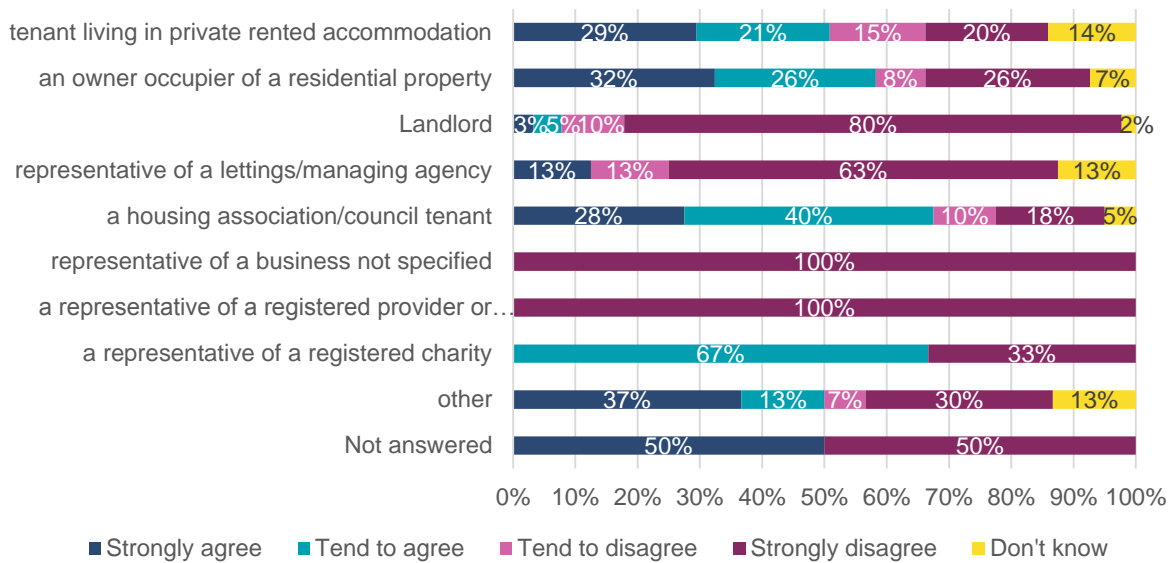
There were 980 responses to this question in the final, overall survey. 40% (394) agreed that the fee is reasonable, 52% (513) disagreed.

Final, overall survey - Do you think the proposed fee for selective licensing is reasonable?



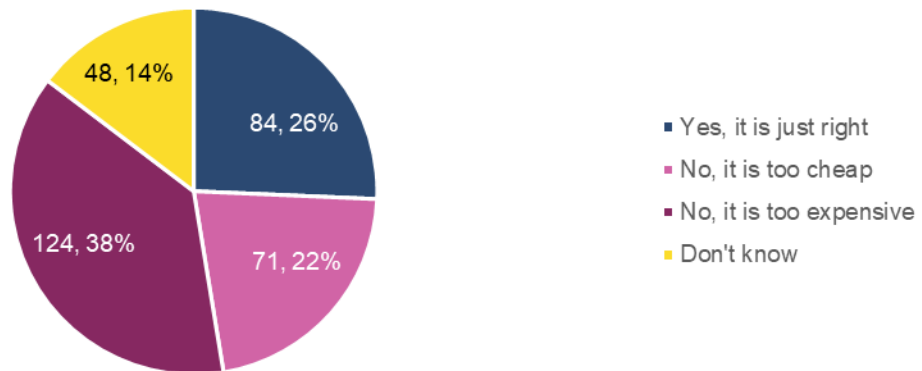
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants agree with the proposed fee, with around 60% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 75% disagreeing.

Final, overall survey - Do you think the proposed fee for selective licensing is reasonable?



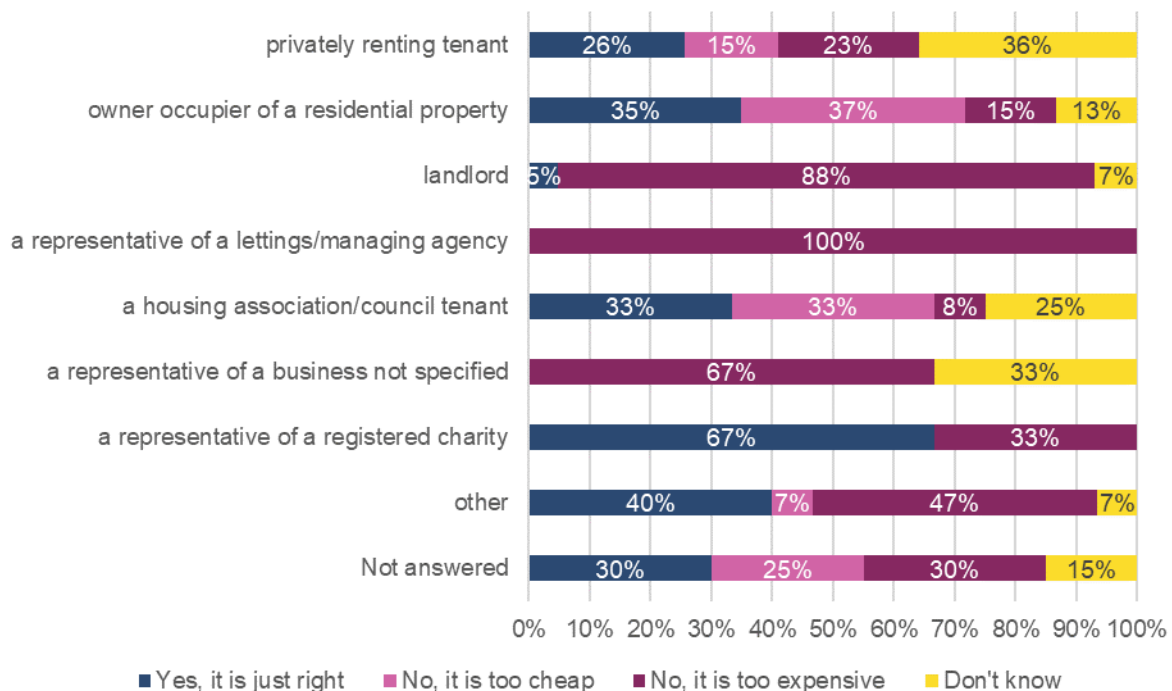
Respondents to the initial three surveys asked respondents if they thought the proposed fee for selective licensing is reasonable. There were 327 responses to this question. 38% (124) think that the fee is too expensive.

Initial three surveys - Do you think the proposed fee for selective licensing is reasonable?



Looking at the responses by group, owner occupiers, and housing association/council tenants think the fee is just right or too cheap. Landlords and representatives of letting/managing agents are opposed to the proposals with over 80% saying that the fee is too high.

Initial three surveys - Do you think the proposed fee for selective licensing is reasonable?

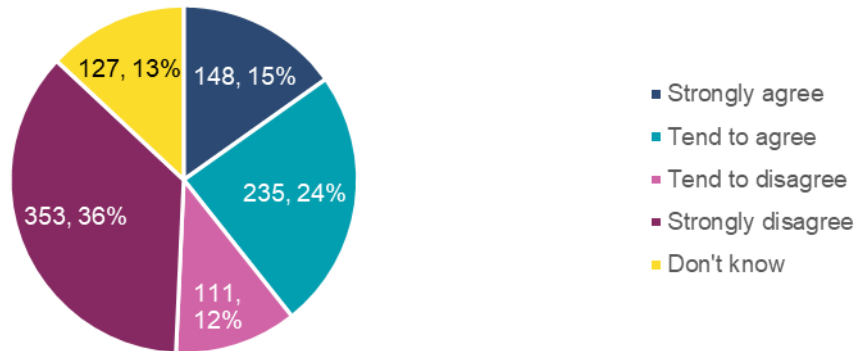


Views on the proposed discounts

Respondents to the final, overall survey were asked how reasonable they feel the proposed discounts are. The proposed discounts are a discount of £128 for accredited landlords and landlords who apply during the “early bird” period, and a discount of £320 for eligible charities.

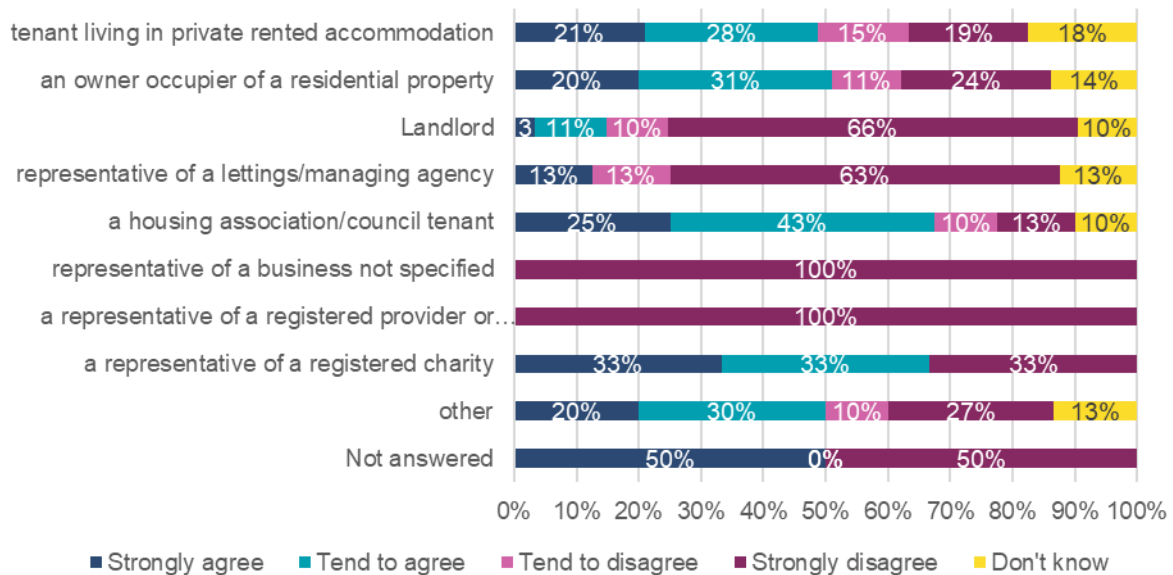
There were 974 responses to this question in the final, overall survey. 39% (383) agreed that the discounts were reasonable. 48% (464) disagreed with the discounts

Final, overall survey - Do you think the proposed discounts for selective licensing are reasonable?



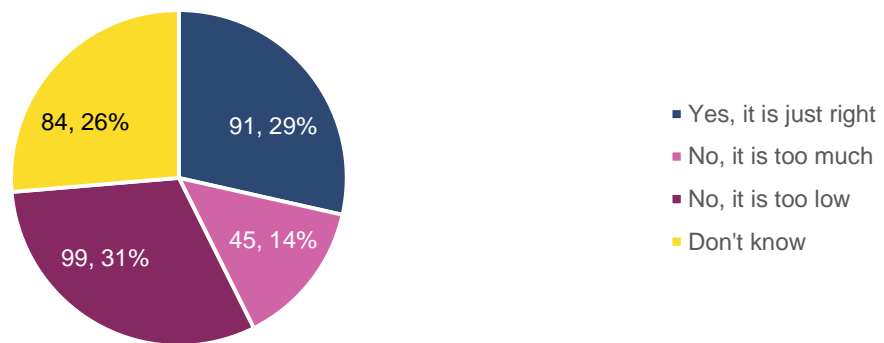
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposed discounts with around 50% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 75% disagreeing.

Final, overall survey - Do you think the proposed discounts for selective licensing are reasonable?



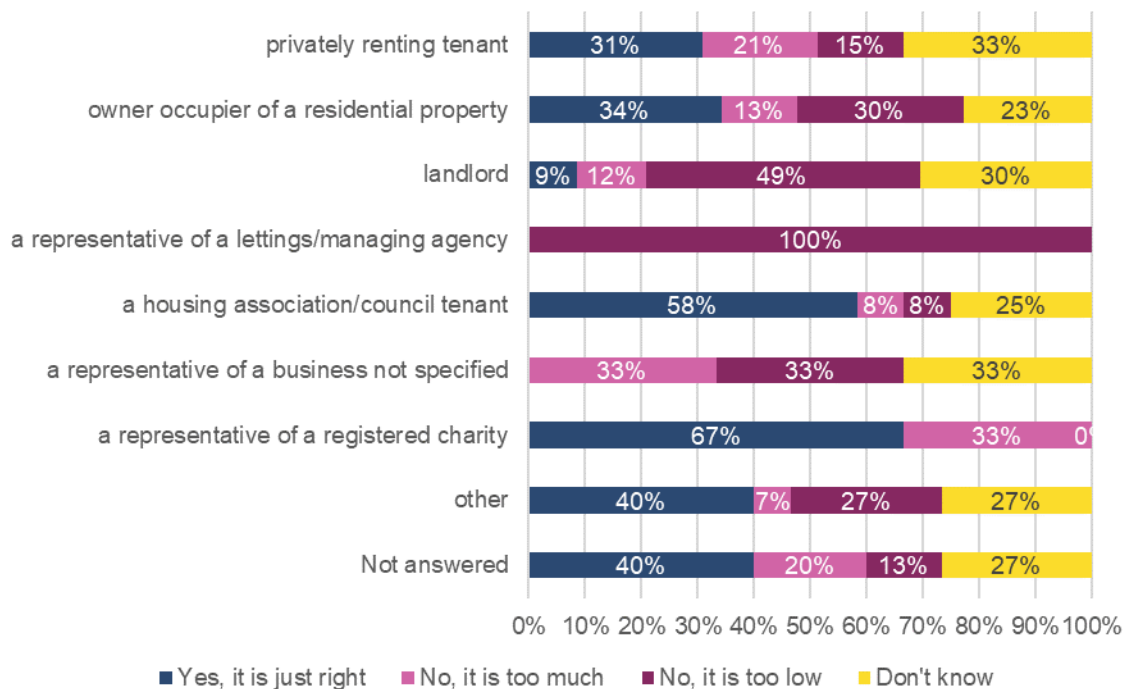
Respondents to the initial three surveys were asked how reasonable they thought the proposed discounts for selective licensing are. There were 319 responses to this question. 43% (136) think that the discounts are just right or too much.

Initial three surveys - Do you think the proposed discounts for selective licensing are reasonable?



Looking at the responses by group, privately renting tenants and housing association/council tenants stated that the discounts are just right or too high. It is notable that a high proportion of almost every stakeholder type stated that they “don’t know” if the discounts are reasonable.

Initial three surveys - Do you think the proposed discounts for selective licensing are reasonable?

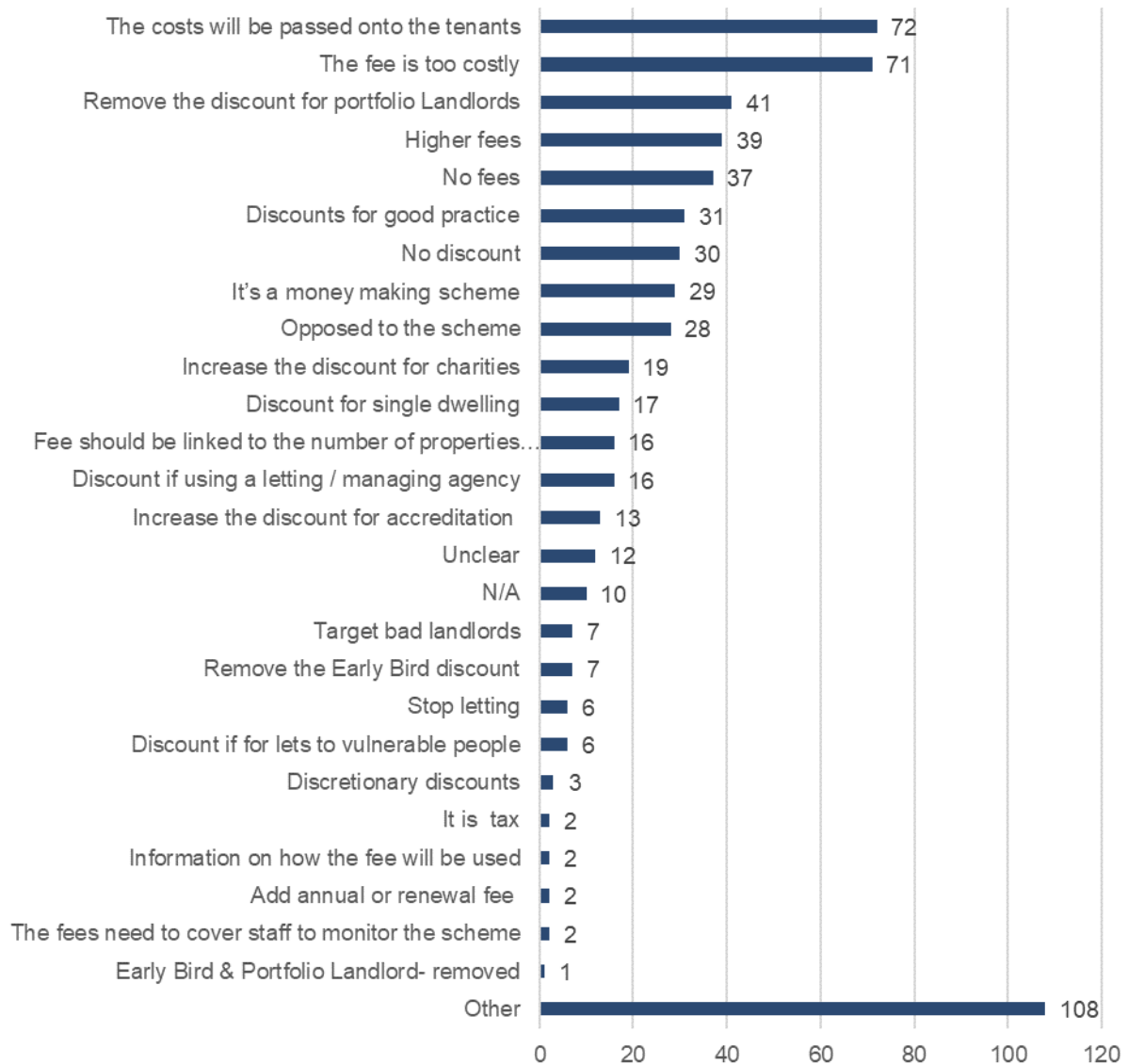


Respondents to all the surveys were asked if they thought any discounts should be removed, or any additional discounts should be considered. In total there were 627 comments from respondents, 255 from landlords, 103 from private tenants, 203 from owner occupiers and 66 from other respondent types. Themes which received fewer than two comments were grouped under ‘other’.

Key themes for discounts that should be included or removed are that “the costs will be passed onto tenants”, “the fee is too costly” and “remove the discount for portfolio landlords”.

All representations to the consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

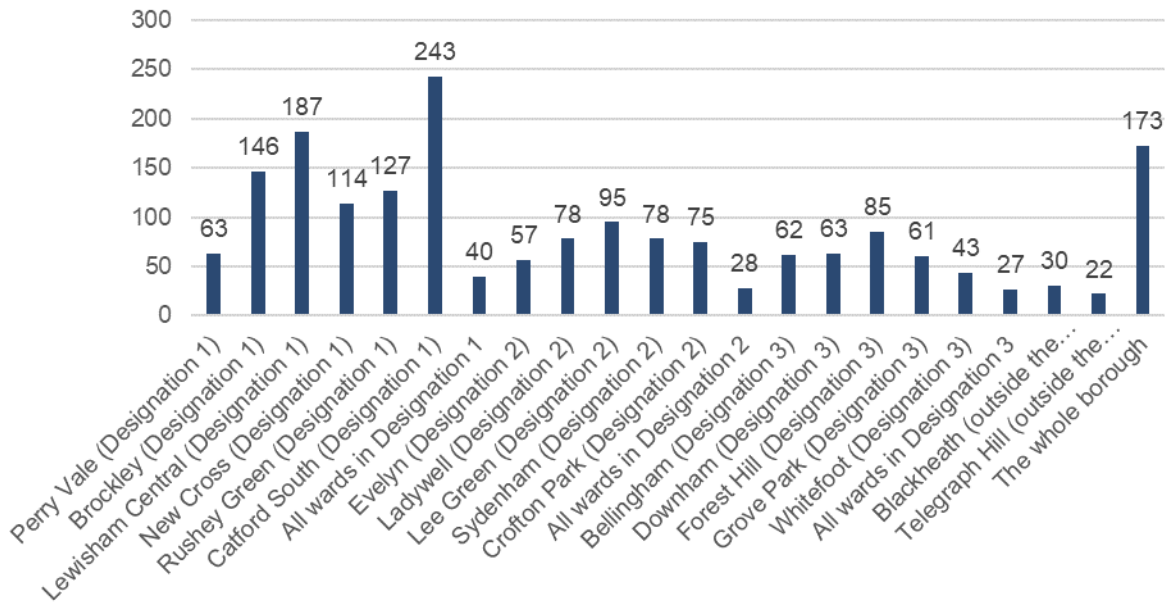
What would you change about the proposed fees and discounts?



Respondents' connections to Lewisham

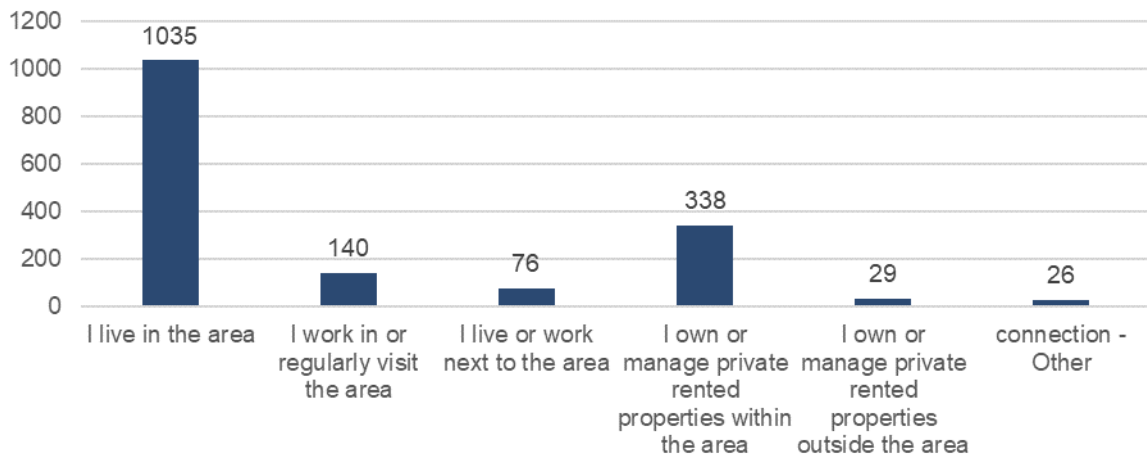
Respondents were asked to select which wards they were commenting on for the consultation. Respondents could select multiple answers. The area with the highest number of responses were "the whole borough" and Catford South (Designation 1).

Areas being commented on:

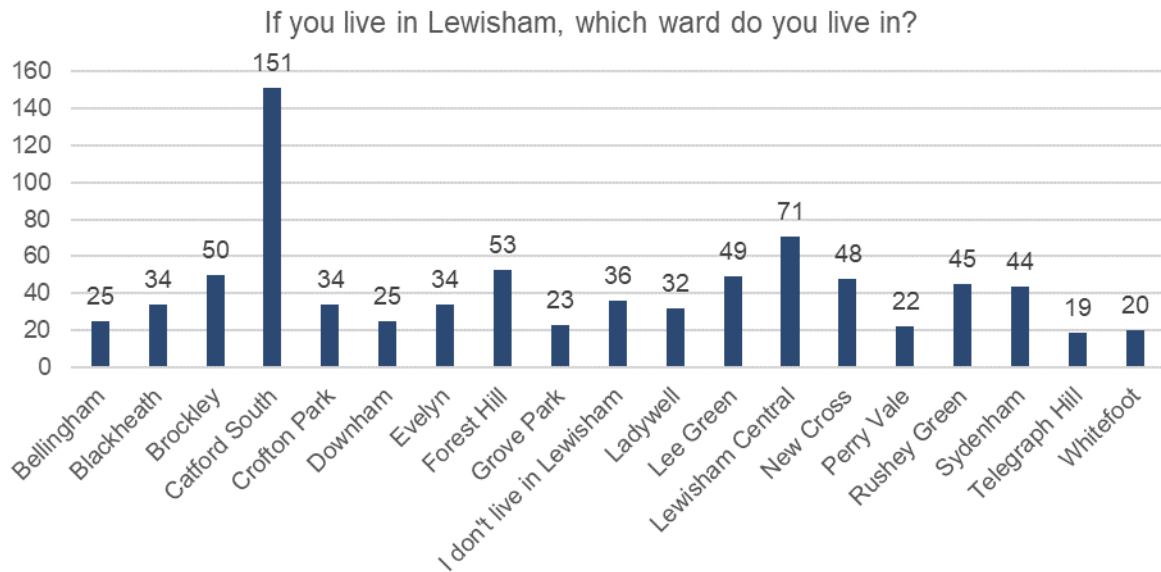


Respondents were asked what their connection was to the areas they were commenting on. Respondents could select multiple answers. The overall majority stated that they live in the area.

Respondents' connections to the area commented on:



Respondents were asked, if they live in Lewisham, which ward do they live in. 815 respondents answered this question. The area with the highest number of responses was Catford South.

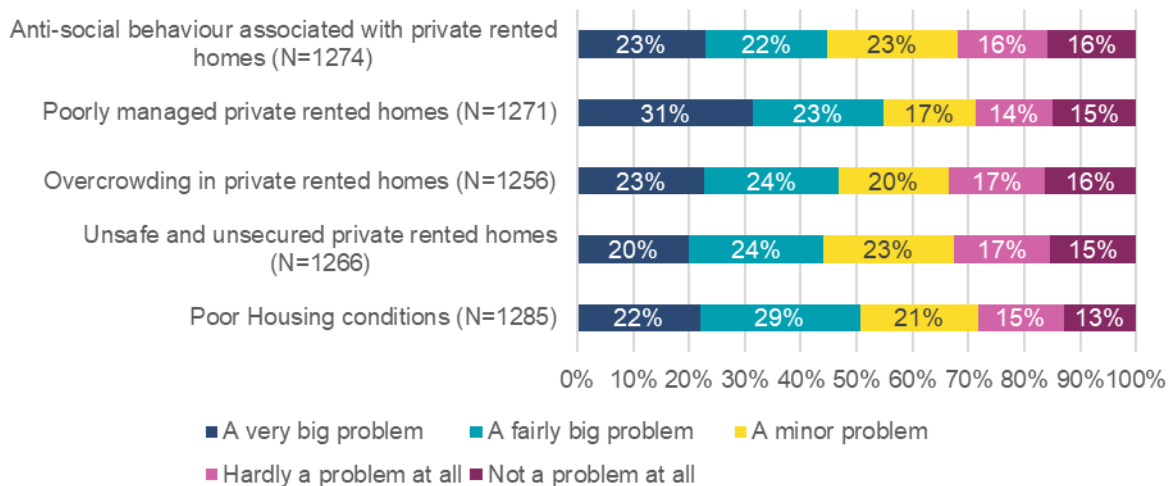


Views on problems with privately rented homes for Lewisham

Respondents were asked for their views on problems for privately rented homes in the areas they were commenting on. (The number of respondents for each question are shown on the graph below as N=).

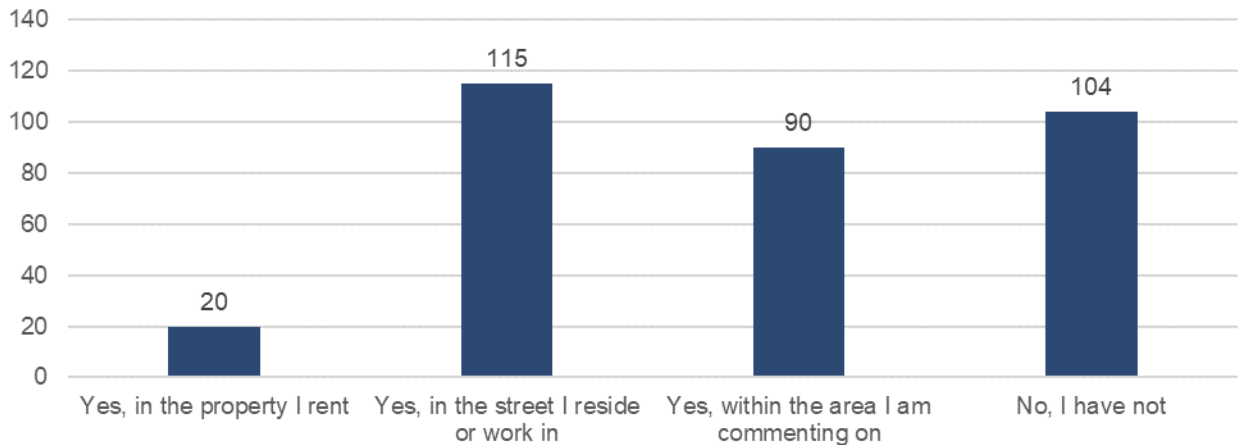
Over 40% of respondents thought that all the problems were either a very big problem or fairly big problem in privately rented homes.

How much of a problem do you think the following are for private rented homes in the area(s) you are commenting on?



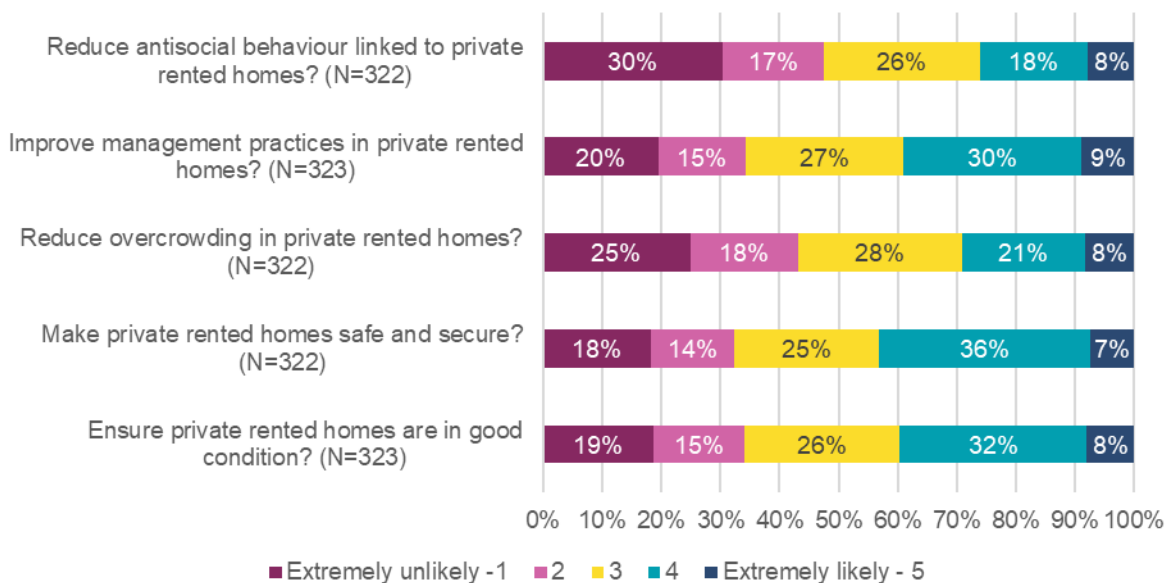
Respondents to the initial three surveys (one for each designation) were asked where they have experienced these sorts of issues in Lewisham.

In the past five years, have you experienced these sorts of issues in Lewisham?



Respondents to the initial three surveys were also asked to rank on a scale of one to five, where one is extremely unlikely and five is extremely likely, how likely that licensing conditions would improve the following conditions in private rented homes. (The number of respondents for each question are shown on the graph below as N=).

In your opinion, (on a scale of 1 to 5, where 1 is extremely unlikely, and 5 is extremely likely) how likely is it that the licensing conditions will:

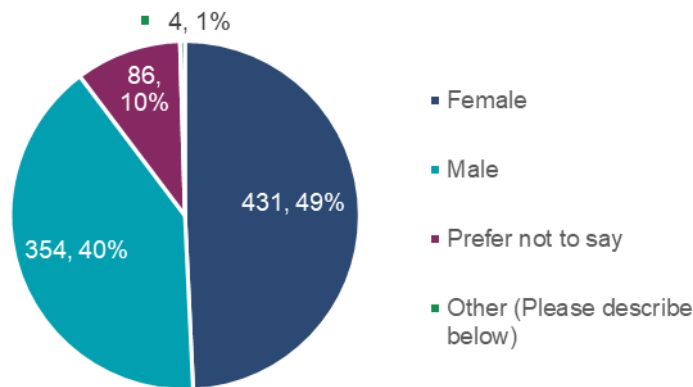


The profile of respondents

Respondents were also asked to provide some demographic information to see if the consultation had captured the views of a group representative of the borough.

875 respondents answered the question regarding their sex. 49% of respondents were female, 40% were male and 10% preferred not to say or describe themselves another way.

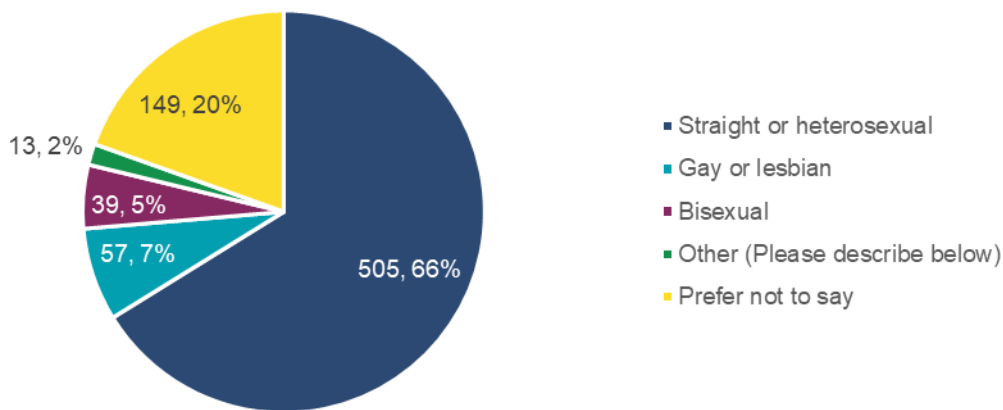
What is your sex?



Respondents were also asked about their sexual orientation and gender identity. 751 respondents answered the question "how do you define your sexual orientation?". 66% of respondents defined their sexual orientation as "straight or heterosexual", 7% as "gay or lesbian", 5% as bisexual and 20% preferred not to answer.

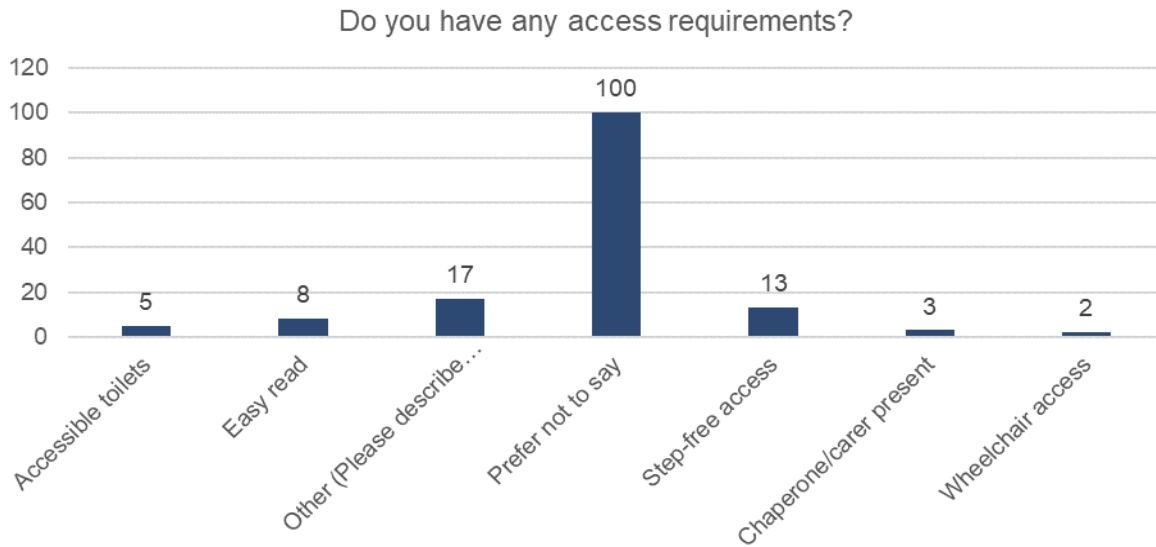
704 respondents answered the question "Is your gender identity different from the gender you were assigned at birth?". 82% of respondents said their "gender identity is the same", 17% answered they would prefer not to say and 1% said their gender identity is different.

How would you define your sexual orientation?

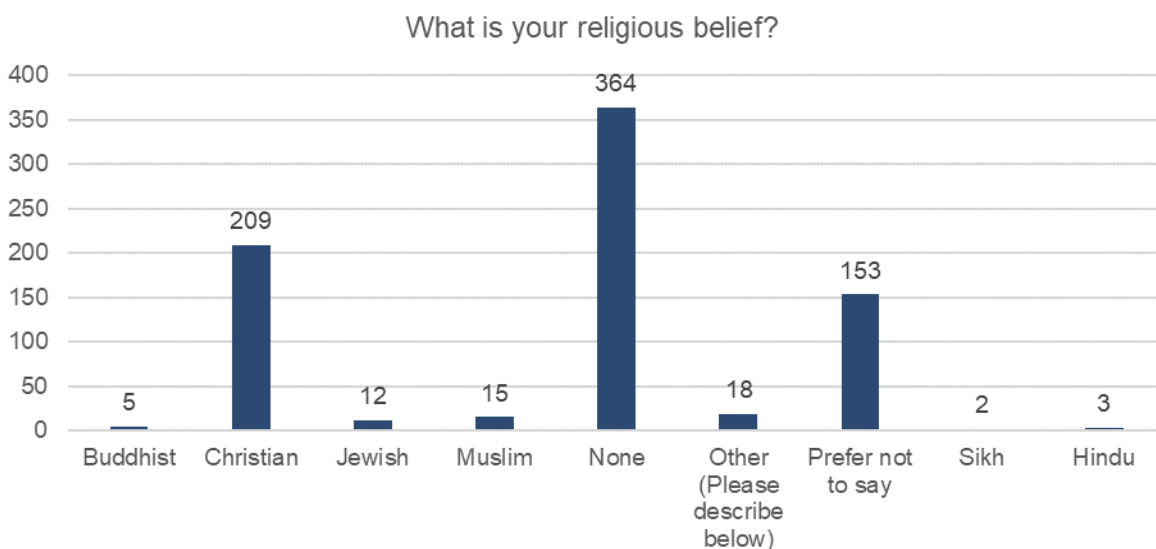


Respondents were asked if they consider themselves a disabled person and if they had any access requirements. 826 respondents answered the question "Do you consider yourself to be a disabled person?". 79% answered no, they did not consider themselves to be a disabled person. 9% answered that they prefer not to say, and 12% answered yes, they do consider themselves to be a disabled person.

144 respondents answered the question regarding access requirements. 66% responded that they prefer not to say, 11% said other, and 9% said they had an access requirement for step-free access.



Respondents were asked about their religious beliefs. 769 respondents answered this question. The highest number of responses were for “none” (363, 47.2%), Christian (199, 25.9%) and “prefer not to say” (152, 19.8%)



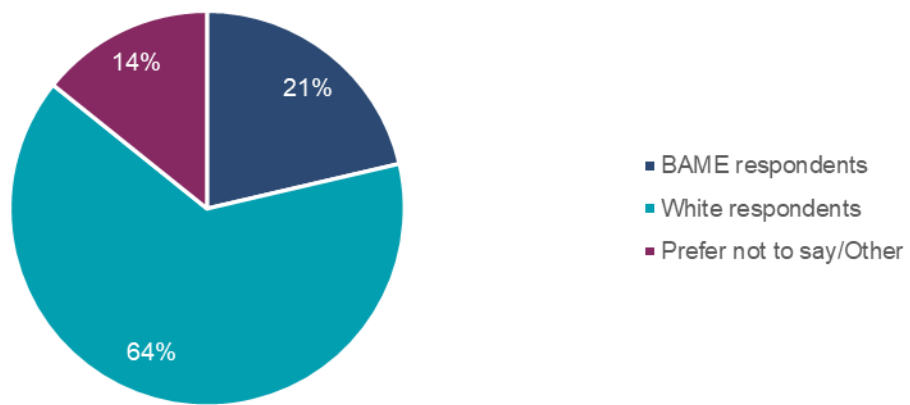
Respondents were also asked about their ethnicity, which was compared with borough’s ethnic composition (Source – GLA 2020). 964 respondents answered this question. The largest proportion of respondents identified themselves as “White – British”.

When compared with borough benchmarks, “White – British” respondents are overrepresented, whereas “Black – African”, “Black - Caribbean”, “Other – Asian” and “Other – Black” are under represented by respondents who answered this question. In summary, 21% of respondents who answered this question were of BAME ethnicity, 64% were white and 14% said they would prefer not to say or describe themselves another way. This is comparable with the responses received by other London boroughs to their consultations on private sector licensing. The response rate from BAME respondents was monitored through the consultation, and every effort was made to ensure that that the consultation was inclusive and accessed all communities. This included distributing posters and leaflets to key community centres, health centres, resident groups, theatres, libraries;

direct emails to more than 400 local community and church groups and advertisements in the Council Tax mail-out, which was sent to approx.135,000 households in Lewisham.

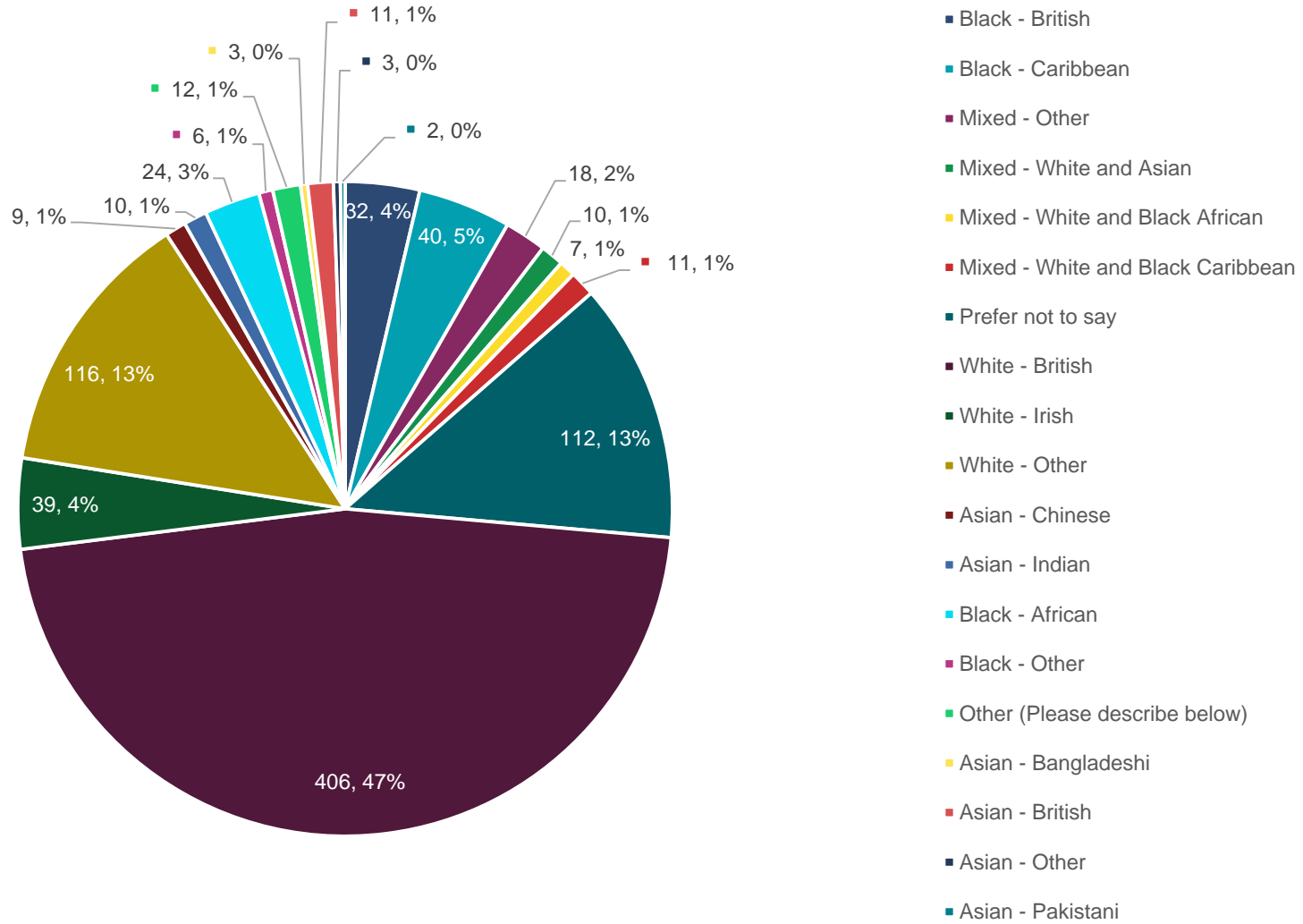
However, the high level of responses from landlords and also from wards within the borough which have higher proportions of white residents is likely to be responsible for the overall results.

Ethnicity of respondents

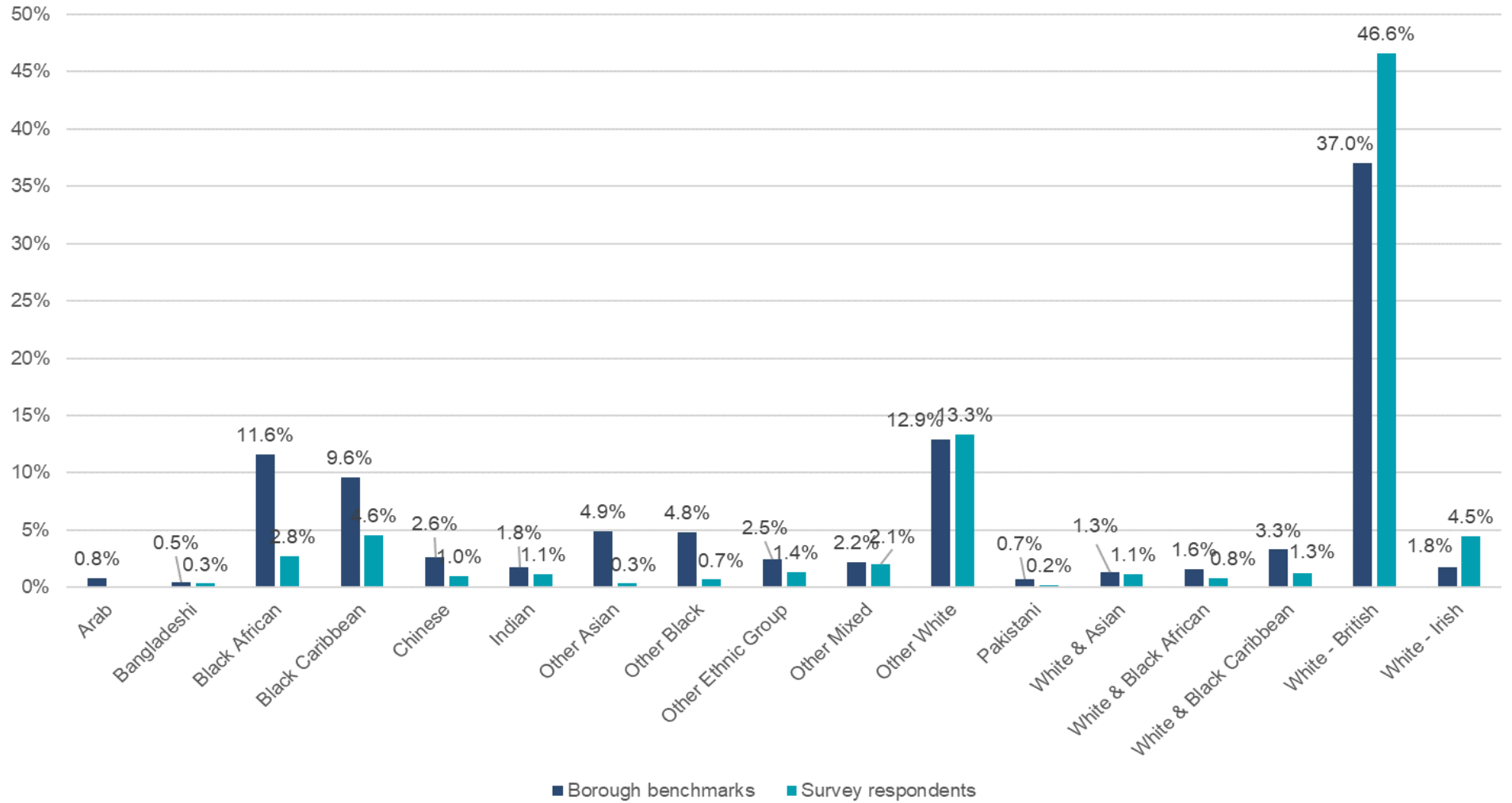


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What is your ethnicity?



Ethnicity of consultation survey respondents compared with the borough's ethnic make-up (Source: GLA 2020)



Feedback from public forums

The council held two public meetings which were attended by 34 people. The meetings were held to provide more information about the proposed scheme and to gather feedback from stakeholders who may be impacted by licensing. The public meetings were held over Zoom, and the council presented information about the proposed schemes, followed by a question-and-answer session. The meetings were advertised on the council's social media, in emails to consultation respondents who had responded positively to the question regarding attending a public forum and in a council landlord and resident e-newsletter.

The majority of attendees in the public meetings were landlords. The questions and comments raised during the meeting were responded to verbally during the meeting, or via the meeting's Zoom chat function. The most common themes of the questions and comments raised during the public meeting were:

- How will licensing address ASB
- Lack of support from the council on dealing with ASB
- Licensing would make landlords responsible for tenants' bad behaviour
- Licensing punishes good landlords
- How will the council identify unlicensed properties?
- How will licensing impact rents?
- How will licensing address deprivation?
- Social housing should be included
- Concerns about the requirement for references
- Questions about the fee and if it could be paid in installments

All representations to the consultation will be considered in line with the Housing Act 2004 and the council's consideration published as an annex to this consultation.

Written feedback

The council accepted feedback on the proposed licensing schemes from by ten emails. The most common themes of the questions and comments raised in the written responses were:

- Licensing would make landlords responsible for tenant's bad behaviour
- Questions about the requirement for references
- Questions about exemptions to the proposed scheme
- Questions if licensing is the best way to address ASB
- Questions about the data used for the designations
- Build-to-rent operators should be excluded
- Questions about bulky waste disposal options at the end of a tenancy
- Queries about enforcement and reporting

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Private Sector Licensing
Lewisham Council's response to
comments and representations
received during the public
consultation

DRAFT

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DRAFT

Changes to the proposed scheme due to consultation feedback

- 1.1. The result of the public consultation on the introduction of a selective licensing scheme demonstrated clear overall support for all three designations. Though a majority of landlord respondents disagreed with the introduction of all three designations, an overwhelming majority of both private tenants and other respondents agreed with all three designations.
- 1.2. The primary objective of the selective licensing scheme will be to improve the quality of the rental market for private renters and a secondary objective will be to ensure that privately rented homes have a positive impact on neighbourhoods. The council therefore proposes to proceed with the application to introduce selective licensing in the borough.
- 1.3. At this stage, the council proposes to make some minor amendments to the scheme on the basis of the consultation response, as set out below. However, prior to presenting this response for approval by Mayor and Cabinet committee, the council will consider whether any further, more substantive amendments should be made, and this paper will be updated if necessary. The minor amendments proposed at this time are:
 - The addition of a license condition regarding the exterior of the property, to place an obligation on the licence holder to ensure that all boundary walls, fences, communal gardens and yards are kept in a safe condition. This would mirror HMO management regulations and the importance of such a condition was clearly reflected in consultation responses.
 - With regard to fees, some consultation response comments stated that the fee split is unclear. Officers recommend that the fee information be updated with more information about Part A and Part B, how the parts of the fee will be used, and explanatory text outlining things such as how long the licence lasts, who should pay for the licence, what information can be changed without charge (such as change of tenants) and what changes will be charged (change of licence holder)
 - Clearly setting out which landlord accreditation organisations will be eligible for the landlord discount, to ensure that only reputable accreditation providers are accepted.

Comments about agreement/disagreement with the proposed scheme

Theme	Example Comment/Question	Council response
Agrees with scheme	I strongly believe that all private landlords should require licences for the reasons given in the proposals, and more. Housing is a right, and nobody should profit from it while some live in substandard conditions (and many don't have a home at all). If private landlords must exist at all, then the absolute minimum they can do is provide good quality housing, especially in the most deprived areas.	The council believes that all properties should be safe and decent for their inhabitants, which is why improving the quality, standard and safety of housing in Lewisham is a key priority of the council (Housing Strategy 2020-2026) and believes that by introducing selective licensing and working with landlords and landlord associations to improve standards and practice across the borough, we can work towards this aim
	All tenants should have the right to safe and clean-living conditions, without the costs passed on to them. I suspect children would particularly benefit.	

Theme	Example Comment/Question	Council response
Areas Experiencing ASB	I am concerned about the quality, safety and value for money of privately rented properties in Lewisham and the effects this has on tenants' well-being and the general way of life in the area.	The council understands that some properties let in the private sector can cause issues for their neighbours, and has evidence of persistent issues with ASB, poor housing conditions and deprivation. This evidence was provided as part of the evidence pack for the consultation, and is why the council believes that selective licensing would be a useful tool in addressing these issues
	Any efficient and complete licensing for any area is essential. I have seen appalling conditions which tenants are expected to live in by lazy and greedy landlords. I hope that there will also be proper protection built in for good landlords who, like myself, have been taken for a ride by careless tenants?	
	There is already an increasing level of anti-social behaviour and also local services unable to cope with the numbers in this area. Catford South is rapidly changing due to ASB	
Experience with envirocrime	Fly tipping is a big problem in my ward Catford South. Also, dirty streets and unkempt houses	
	Clear that fly-tipping is a significantly greater problem in SE6 compared with SE14 area.	
Experienced issues with council properties	The only anti-social incidents (only a handful) I have experienced in the last 20 years of property ownership in Lewisham have been down to Lewisham council tenants.	
	The Council deem themselves legally obliged to provide housing for the benefit of their tenants and then ignore complaints about said tenants from owner occupiers having to suffer from severe antisocial behaviour such as dealing drugs, fly tipping, nuisance and annoyance from a multitude of similar tenants using the property as a social meeting house. In the 33 months we had one of the Councils tenants residing above us, there were around 80 different visitors, half of whom ignored Covid restrictions during lockdowns, dealt drugs from the property, fly tipped their rubbish to other private residents bins, as well as dumping in the street, discarding cigarette butts on a daily basis and were generally obnoxious to all and sundry in the vicinity. Do the Council take the view that they have to provide accommodation to criminals?	The council has a legal duty to provide housing for all households within the borough deemed to be homeless and in priority need, who meet the eligibility criteria. This duty is conferred on the council by central government. Due to the shortage of available social housing, the council is forced to house some homeless residents in temporary accommodation in the private rented sector. Selective and additional licensing will help to ensure that all privately rented accommodation meets the required standard, including those properties being used for temporary accommodation.
	In my experience, it is council tenants and council run properties that is in breach of the behaviour you describe. There is a penalty on private landlords.	The council website has resources for reporting anti-social behaviour (ASB) in social housing here - Lewisham Council - Report antisocial behaviour if you live in social housing
Experienced issues with HMO properties	My main issue is up to 6 room HMO and anti-social behaviour and lack of actual care for vulnerable tenants	The council understands that there are issues in HMO properties in the privately rented sector. The council introduced an additional licensing scheme in April 2022, which covers small HMOs (with 3-4 sharers) in
	We live next door to two HMOs and experience daily issues with ASB including waste management, noise and badly taken care of	

Theme	Example Comment/Question	Council response
	<p>properties. Would welcome a solution to address existing HMOs too.</p> <p>I live between 2 HMO's privately rented by separate companies/entities, they are both overcrowded, fitting up to 7 people into an identical 2-bedroom house to mine. The issues arising due to overcrowding and mismanagement of properties include damage to my property cry tipping, garbage overflowing, antisocial behaviour especially late at night and a general lack of upkeep to the properties and outdoor spaces which has resulted in a mouse problem in my property which I have had to spend hundreds of pounds on professional pest control to address, and I am still not convinced it is permanently resolved. More regulations are required from the council and monitoring of private rented properties to ensure substandard living conditions created by negligent landlords aren't blighting neighbourhoods.</p> <p>Hopefully this would result in less overcrowded HMOs and landlords taking more responsibility over troublesome tenants and rubbish piled up in front gardens and on the street.</p>	<p>addition to the existing national mandatory licensing scheme for larger HMOs (5 plus sharers). This means that all HMOs in Lewisham are now required to have a license and meet certain minimum standards. Landlords and managing agents who own and operate unlicensed HMOs in a licensed area could be subject to enforcement action.</p> <p>The conditions for HMOs are available via the council website here and they address minimum room sizes and maximum occupancy, health and safety, refuse and pest control.</p> <p>The register of licensed HMOs is available here. If you believe you have identified an unlicensed HMO, or have concerns about an HMO or other privately rented property in your area, please report it to pshe@lewisham.gov.uk and an officer will be assigned to investigate.</p>
<p>Experienced issues with rented properties</p>	<p>In poorer areas with lower rates of homeownership residents are less likely routinely complain about conditions or to organise amongst neighbours to complain, compared to wealthier areas with organised neighbourhood watch groups for example. This results in under-reporting in some areas which hasn't been taken into account. Evelyn/New Cross also bear the brunt of anyone turned away from Landmann Way (which is very poorly run compared to the OKR site in Southwark). Most private let's don't have car access needed for so rubbish, mattresses etc is dumped on corners when short-lived tenancies move on. Landlords use the area as a dumping ground for fridges, mattresses etc. The absence of any CPZ in the area also contributes to antisocial littering/residential fly tipping as there is no "natural surveillance" from traffic wardens. All of these issues compound poor rented living conditions and ASB issues.</p> <p>I live in designation 1 area, and am aware of antisocial behaviour, unchecked by landlords, including to some extent in my own block e.g., noise, fly tipping, rubbish left lying around for foxes to spread around, lack of consideration for neighbours</p>	<p>As stated above, the council understands that some properties let in the private sector can cause issues for their neighbours, and has evidence of persistent issues with ASB, poor housing conditions and deprivation. This data was provided as part of the evidence pack for the consultation and is why the council believes that selective licensing would be a useful tool in addressing these issues.</p>

Theme	Example Comment/Question	Council response
It should be borough-wide	<p>If you are going to licence you need to licence all.</p> <p>I think the same issues occur throughout the Borough, so it's pretty meaningless to single out one group of wards from another</p> <p>I believe all wards should have the same focus - the areas are all present regardless of the extent of deprivation</p> <p>I don't think it's right to stereotype a specific area. Each situation needs to be assessed on its merits</p>	<p>The council can only introduce selective licensing in areas in the borough where there is evidence that the area meets the criteria as laid out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015.</p> <p>The council carried out a detailed analysis of the evidence available and has been selective in proposing designations for areas that meet the criteria of poor property conditions, deprivation and ASB.</p> <p>If the council proceeds to make an application to introduce selective licensing, and is successful in doing so, we will continue to monitor the evidence for the need for selective licensing throughout the borough and consider whether there may be a case for borough-wide licensing in the future. The council has already introduced borough-wide HMO licensing, in recognition of the fact that there are particular issues with this type of privately rented housing.</p>
Licensing is a money-making scheme	<p>Tenants already have the ability to report poor conditions, too many tenants in confined spaces. The LA need to make it easier for tenants to report this. This is just lazy LA policymaking to make money. The illegal landlord will keep renting to illegal renters, these are the ones there are no AST's, it's a cash business and LA's need to stamp this out not charge law abiding Landlords.</p> <p>All the additional regulations ultimately duplicate rules for landlords that are already in place. The council is using this purely as a money-making exercise and it will ultimately cause private rental prices to rise as landlords will need to pass on this cost. Utterly pointless apart from increasing revenue for the council.</p> <p>The licencing scheme will add nothing to the borough as we have seen from other schemes and is used just to make revenue for the council.</p> <p>There is no problem with private rented properties. This proposal is another way for you to make money out of landlords. You are not helping tenants either as the rents will only go up. See other councils for example</p> <p>The proposal is discriminatory and appears to be a way for the council to increase its revenue.</p> <p>You will push small private landlords, who own 1 or two flats out of</p>	<p>Under the law, the Council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications the Council anticipate, under the proposed designations.</p> <p>The introduction of licensing schemes can make a transformative difference to the provision of services to improve the private rented sector, as demonstrated in other areas of London. Councils receive no dedicated government funding to address poor conditions in the private rented sector. Therefore, without licensing, councils are reliant on severely overstretched council funds to resource such services. In other councils which do not have discretionary licensing schemes this results in underfunded services that struggle to meet statutory obligations.</p>

Theme	Example Comment/Question	Council response
	<p>the rental market. As will not be able to pay extra fees in addition to already being heavily taxed by the government. As someone thinking of becoming a landlord, this will put me off.</p> <p>Why does this apply to some areas and not others is completely unfair and discriminatory</p>	<p>Income from licensing allows the council to pay dedicated officers to perform vital services like property inspections, ordering improvement works to properties, preventing illegal evictions, and, in cases of non-compliant landlords, issuing fines and preparing prosecutions.</p> <p>The work of such services is extremely resource intensive, and vital to improve the market for both landlords and tenants.</p> <p>There is no evidence that licensing and other regulation has an impact on rents or supply of accommodation. Private rents levels are principally determined by the balance between supply and demand. Demand for accommodation remains high in Lewisham and the cost of licensing is marginal (£100 per year for a selective license). The council therefore does not anticipate any significant impact on the supply of accommodation to result from the introduction of selective licensing.</p>
<p>Licensing is unnecessary</p>	<p>Unnecessary cost to both landlord and tenant. Market forces will ensure tenants have freedom of choice. Good landlords need to keep their tenants so will ensure a high standard. Properties are an investment, so it doesn't make sense to let it depreciate. Private renting is a private contract between counterparties. If there are issues with properties, these are contractual breaches, and they should be dealt with in courts.</p> <p>There are already laws in place to cover these issues. I do not see any need for the Borough to enforce any further licensing on private Landlords. The government are continually updating rental requirements. I would prefer a spot check system or the council to take action where they have had complaints from tenants.</p> <p>I keep my two properties in very good repair and the rents are reflected accordingly. If properties are left in poor condition, then the asking rent will be reduced and therefore not in the landlord's best interest.</p> <p>The market will resolve any issues that you have highlighted.</p>	<p>Whilst the Council acknowledges that many landlords operating in the borough keep their properties to a high standard, the evidence presented during the consultation shows that there are large scale issues with poor property conditions, and antisocial behaviour in the borough's private rented sector, that licensing can help to address.</p> <p>The council believes that many landlords will meet the licence conditions, and do keep their properties in good condition, but licensing enables the council to take action against those landlords who place their tenants in unsafe properties.</p> <p>The current imbalance between supply and demand of affordable rental accommodation means that in practice many renters do not feel empowered to complain about their properties for fear of being evicted. Likewise, many renters report feeling trapped</p>

Theme	Example Comment/Question	Council response
	<p>It's a pointless intervention that serves no purpose. Most of the 'problems' listed here are caused by the tenants themselves, not the landlords.</p> <p>I don't think it's needed and I see this as an extra tax on landlords who are already being squeezed by the Government. If Lewisham Council want to police such issues wherever they may exist (in the minority) then there are other ways to go about policing it without introducing an unnecessary and pointless license which is ultimately another revenue earner for Lewisham Council.</p>	<p>in unsuitable rental accommodation due to a lack of affordable housing options. The council is working hard to increase the supply of affordable housing in Lewisham, but in the meantime there is a clear need for proactive enforcement of standards and conditions in the sector.</p>
Licensing punishes good landlords	<p>I am a socially conscious landlord - our tenants have stayed with us five years - we have not put up their rent in that time and we have faced massively increased bills, regulation compliance costs and increase in council tax which we pay and is included in their rent. We are considering giving up and if costs rise anymore - we will no longer do it. Seems unfair to penalise some good landlords for the sins of others</p> <p>The licensing puts added pressure on the landlords in a biased way. The live ending should apply to all landlords or not at all. It should not be selective dependant on the type of tenants. This just penalising good landlord that already follows the rules.</p> <p>I think the council already has sufficient powers to improve housing, antisocial behaviour etc. Good landlords should not be sweeper up in this and the inevitable extra fees that will accompany it.</p> <p>landlords are already suffering. We just bought property for investment and retirement purposes. Burdening us with more and more conditions is unfair.</p>	<p>As stated above, the council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the borough is experiencing large scale issues in the private rented sector with poor property conditions and anti-social behaviour.</p> <p>The Council's intention is to use the regulatory framework provided by selective licensing to focus on those that do not comply. Such landlords impact negatively on the reputation of responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. We will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords.</p>
Licensing through estate agents already have to meet standards	<p>No evidence that this will improve property conditions or reduce ASB. Private rented accommodation through estate agents already has to meet a specific standard.</p> <p>I do not see any issues. I rent my flat via a known, responsible management agency. The property is leased out in good shape. The management agency ensures our gas certificate is up to date. He ensures proof of compliance with all mandatory H&S certification regulations (i.e., Smoke and CO Order, Gas safe, PAT testing Electrical Safety) yearly. We provide written tenancy agreements. Money is withheld from rent every month in case an emergency repair is needed. We even lease a out a bit below the going rate.</p>	<p>The council acknowledges that there are many good estate and managing agents who operate in the borough, however, not all provide a good service, or know what the regulations are with respect to privately rented properties. Membership of professional bodies is, unfortunately, no guarantee of competence.</p> <p>For example, real estate agents are not required to have Housing Health and Safety Rating System training, which the council is required to use to make a decision regarding the safety of a property.</p>

Theme	Example Comment/Question	Council response
	<p>My property is on The Dulwich Estate, albeit with a SE23 postcode, and is managed by an agent that is a professional member of ARLA, NAEA and The Property Ombudsman whose standards are no doubt higher than anything LBL will impose.</p> <p>I don't believe it's necessary to have the licensing, we have a privately rented home which is managed successfully by an estate agent, the freeholders help keep the maintenance under control and the tenants look after their responsibilities too. The council will not have any effect on the condition of the property.</p>	<p>Accredited landlords can receive a £128 discount on the cost of the licence.</p>
<p>Licensing will cause landlords to sell/ leave the sector</p>	<p>I am a Sydenham landlord. My property is well kept, fully certificated. I never increase a tenants rent, replace any kit which is broken. I treat people fairly, yet I am tarred with the brush of being a landlord. It is now getting to a stage where I will probably sell up and make my tenants homeless.</p> <p>At present we are going through the process of applying for your additional HMO license. This is causing us a headache and costing us thousands of pounds. We are willing to do this if it helps stamps out landlords who take advantage of people who live in unsatisfactory conditions. Though we are far from this type of landlord, we treated the same. Can I ask that those who have gone through this process, have a satisfactory HMO license, be exempt from needing the additional license you are currently considering? We would have already submitted every conceivable document and paid a hefty fee. We will be stretched this year as it is, if we have to pay for another license we will probably have to sell up which would have the opposite effect on the tenants that you are trying to protect.</p> <p>I think it is a poor idea to introduce any form of licensing for landlords. I think licensing could be the straw that broke the camel's back and could potentially see an exodus of private landlords in the area. With the continuous financial pressure and regulations, I am certainly considering leaving the market. I believe this will have a negative affect and reduce choice and increase rental prices</p> <p>As a landlady I take extra care and precaution to ensure good living conditions, provide all documentation and ensure maintenance is carried out regularly. All of this is already very costly with the various works required, cost for tradespeople to conduct work, providing certification etc. I don't feel it fair or</p>	<p>We have seen no evidence that landlords have moved elsewhere or that there has been an increase in difficulty in finding rental properties in a licensable area. This is similar to the evidence from other authorities who have also been operating licensing schemes for many years. The private rented sector is a growing sector, and properties continue to be in high demand, including in areas where licensing has been introduced.</p> <p>Landlords whose properties are currently subject to additional or mandatory HMO licensing will not need to apply for a selective license.</p>

Theme	Example Comment/Question	Council response
	necessary to provide a blanket license for all landlords as such, as it would only act as a deterrent to rent out property in the area.	
	Private rent sector is good properties for good tenants - this is another tax on landlords which discourages landlords taking rental stock away meaning less properties for tenants.	
My properties are well maintained/ tenants are happy	We have tenants who stay with us for years and are pleased with us and don't want to leave as we look after them very well	Whilst the council understand that many landlords will already meet these conditions, licensing enables the council to ensure this is the case and focus on taking action against those landlords who place their tenants in unsafe properties. The council will also offer discounts for landlords who follow good practise through the early bird discount and the discount for accredited landlords.
	I know that the property I am charge of is handled, although I can speak to other properties within the designated area.	
	I only know of the one house, that I let to friends. It is in excellent condition throughout and well maintained. Any problems that arise are immediately dealt with. A service contract (financed by me) with maintenance covers plumbing, electrics and drainage. The property is subject to a [unclear], agreed {periodic Tenancy agreement, regular base electric inspections, has an energy performance certificate and tenancy deposit certificate	
Need more information on the designations	not enough specific information to make a judgement e.g., about internal housing conditions for the various types of privately rented accommodation in the various designations. I did look at some of the background reports and information, but remain unsure that there are major problems that require new measures	As part of the consultation, the council provided an evidence pack which outlined the evidence for the designations, and a housing stock and stressors report for the borough. This information is still available here on the council website
	Would prefer to see all stats for the designated areas.	
	The entire questionnaire so far lightly mentions that the council has identified evidence, but it hasn't provided it in depth. Asking my opinion is not very helpful beyond politics as my opinion would be based on my limited exposure/example of 2 or two examples that I know about. In a nutshell, residents should be given better information so that they can have an informed opinion to add to their anecdotal evidence.	
No experience with issues given as justification for the scheme	I and my tenants haven't encountered any anti-social behaviour around new cross area and repairs happen straight away.	The council acknowledges many people have positive experiences in the private rented sector. It is estimated that 31 per cent of the borough lives in the private rented sector. Therefore, the private rented sector plays a key role in housing for the borough, and the council has made it a priority to ensure quality and improve standards in the private rented sector. As explained in the consultation evidence pack, the council has evidence of persistent issues with anti-social behaviour, deprivation and poor property conditions in the private rented sector.
	I am not a resident in the area so only have limited knowledge of the designated area (Brockley) where I own a flat which I rent out. The accommodation is spacious and well-appointed, and I am not aware of any ASB problems in the immediate vicinity. The streets in the immediate area have large, Edwardian houses which do not seem to fit the description of Designation 1. However, I cannot comment on the other areas listed under Designation 1.	
	Myself and my family own properties in this area. We are not aware of the issues being referred to in designations 2 and 3.	

Theme	Example Comment/Question	Council response
<p>Opposed to the scheme</p>	<p>I only rent one property on a road where there is a mix of council tenants, private tenants and owner occupiers. I am not aware of any problems</p>	
	<p>State interference in the sector will only cause more problems while not helping or making the problems it aims to solve actually worse.</p>	<p>Whilst the Council understands that some stakeholders may disagree with the proposal to introduce selective licensing, the Council has provided evidence of the need for selective licensing to tackle persistent issues with poor property conditions.</p>
	<p>It is yet another stealth tax on non-wealthy individuals (I earn £35k pa) who are trying to make prudent provisions for their own retirement (as we are all living longer). Tax large corporate landlords if you must.</p>	<p>The Council can only introduce selective licensing in areas in the borough where there is evidence that the areas meet the criteria as laid out in the Selective Licensing of Housing 2015 (Additional Conditions). The council carried out a detail analysis of the evidence available and has been selective in proposing designations for areas that meet the criteria of poor property conditions and anti-social behaviour.</p>
	<p>Strongly disagree with the whole idea. It's a covert way to tax people who can afford to pay. I do not see it as a problem whatsoever. It's best to be left to be managed privately rather than by the government</p>	<p>The council recognises that many landlords who rent out properties in the private rented sector manage their properties responsibility. However, the council has evidence of persistent issues with poor property conditions in the proposed area.</p>
	<p>I'm not convinced about the way the designations have been set up. For example, in Grove Park Ward there is some well-maintained property with good living conditions but ASB still takes place. There are also some properties in very poor condition in the same area. A more targeted street by street selective licencing scheme approach would be better.</p>	<p>Whilst the council understand that many landlords will already meet these conditions, licensing would enable the council to ensure this is the case and focus on taking action against those landlords who place their tenants in unsafe or overcrowded properties.</p>
	<p>It is ineffective and causes more irregular housing leading to homelessness. This is based on my experience with this which leads to a backlog of licensing requests which take far too long to come in reducing the viability of available properties and increasing the cost of rent throughout the entire area, especially when reinvestment in the area occurs with new owners coming in. The constant strain on licensing services due to new landlords exacerbates this problem of wait times.</p>	<p>Under the law, the council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications we anticipate, under the proposed designations.</p>
<p>Other</p>	<p>Waging war on landlords isn't helpful. The problem is the lack of supply of private rented accommodation. The more supply relative to demand, the more choice and the lower the price for tenants.</p>	<p>The council supports more housing being built in the borough and is also building new council housing stock for the first time in a generation. 1,200 new social homes have been delivered in Lewisham since 2018</p>

Theme	Example Comment/Question	Council response
	<p>More bureaucracy doesn't help. We need to encourage more landlords and build more flats and houses.</p>	<p>through the council's Building for Lewisham programme, exceeding the council's original target of 1,000 new homes. These homes are being delivered across the borough, including in Hither Green, New Cross, Forest Hill, Catford South and Brockley. The locations of a thousand additional new homes are set out in the council's draft local plan.</p> <p>However, despite the delivery of new homes, there will continue to be a need for more and better quality privately rented accommodation. The aim of licensing is to ensure that properties that are let out are of a good standard for those renting</p>
	<p>Many landlords won't accept that they have be licensed and a result, will only rent their properties to families. This is creating a huge lack of available housing for professional sharers which is a large part of the private rental sector. The result will mean groups of sharers who are able to find accommodation will be forced to pay higher rents due to a shortage of supply</p>	<p>Selective licensing covers properties that are let to single family households and two sharers</p>
	<p>If the scheme is approved, the council should consider providing an annual summary of outcomes to demonstrate improvements to tenants' and landlords' behaviour and the impact of licensing on the designated area over the scheme's lifetime. This would improve transparency overall. Should the scheme go ahead and be approved, the council will need to show substantial enforcement work taking place within the designated areas to improve on the patchy enforcement record vastly. This would involve a considerably high level of inspections and robust enforcement when needed.</p>	<p>The council is committed to improving its communications with renters and landlords alike and will be publicising the scheme and its outcomes using our communications channels and the local press. If the licensing scheme is introduced, the council proposes to increase the landlord forums and support events, with help and guidance.</p>
<p>Reduce the number of HMOs</p>	<p>And landlord with HMO should be licensed Council must stop HMOs being built They do not conform to space standards</p> <p>A HMO is being implemented in the house 2 doors from mine. It is not sympathetic to history of the building (VICTORIAN)and goes against the covenants that I faced when I bought my house (that it could not converted to individual dwellings). I live on the Corbett estate. The fact that the Corbett estate has lots of families living in houses rather than flats is what makes it desirable to newcomers. This is damaging the community in our area</p>	<p>As stated above, it is estimated that around 31 per cent of the households in the borough live in private rented accommodation. The council is also aware of the proliferation of large HMO conversions in certain parts of the borough, including Catford South. The private rented sector, including houses in multiple occupation, play an important role in providing housing in Lewisham. However, the council wants to ensure that conversions meet the necessary standards, that properties let out are safe for the tenants who live in</p>

Theme	Example Comment/Question	Council response
	<p>Lewisham as a whole has a reputation for some poor housing, ASB and a lack of cleanliness, where household white goods, rubbish and mattresses are deposited on pavements or left in front gardens for someone else to dispose of. this is in part due to the high concentration of renters in our area, where the individual has only a transient interest in the community, no real interest in the upkeep of the property as it is not owned by the renter who in due course will be moving to another area, Thus, by the Council trying to attract more people to rent in our area will only exacerbate the problem. This does not mean that no blame rests with the landlord, many of whom do not really care about the condition of their property so long as they receive a substantial rental income. This can be made worse by the Council allowing HMO licenses.</p> <p>HMO NO LICENCES IN NORTH LEWISHAM IS WHAT WE NEED ITS REDICULIUS PANDLORDS ARE BUYING ALL THE HOUSES ON THE STREET</p>	<p>them, and that any adverse impacts of this type of development on neighbours and the surrounding area are minimised.</p> <p>As a result, the council introduced additional licensing in April of this year (2022) which covers small HMOs which were not covered by the national mandatory licensing scheme. The licence conditions for HMOs can be found on the council website here are they address minimum space requirements and health and safety. In addition, in June 2022 Lewisham Council's Housing Scrutiny Committee agreed to recommend the extension of the existing Article 4 Direction to the remainder of the borough not currently covered. This means that permitted development rights for the change of use from a dwelling house to a small HMO will be withdrawn, and those wishing to undertake such conversions will need to apply for planning permission.</p>
<p>The cost will be passed onto tenants</p>	<p>This is a further administrative and costly burden on landlords who will only pass those costs on. It's a blunt tool to overregulate what in many cases (my case) are perfectly happy and responsible landlord/tenant relationships. This is admin for the sake of it.</p> <p>While most of selective licensing provisions are good, they unfortunately bar many people from being able to rent, and they may cause renting costs to rise due to passing on of the increased expenditure.</p> <p>My main concern is making sure that the council make it easy and transparent to get a licence if required. I agree with the principle of improving the housing stock and the role landlords play in refurbishing and maintaining properties, but be aware that if getting the licence becomes onerous (or expensive) then this will inevitably filter through to tenants eventually via higher rents or more void properties which cannot be let due to incorrect paperwork</p> <p>Do not agree with adding additional charges to landlords as this will pass through to tenants and I am hugely concerned by actions of the council constantly driving up prices locally, pushing working class families out of affordable housing.</p>	<p>We have seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere, and this is similar to the findings from other authorities who have also been operating licensing schemes. Similarly, research carried out by an independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing) showed that selective licensing did not result in an increase in rents in areas with a scheme, that market forces dictated the rent levels.</p> <p>If landlords want to increase the rent, there are procedures which must be followed and any increase above market rents levels can be challenged via the Residential Property Tribunal.</p>

Theme	Example Comment/Question	Council response
	<p>Little transparency on which landlords would be liable. Why not do more to liaise with and if necessary, penalise those landlords that are not assisting the Local Authority to promote change. There's no consideration to the financial status of private landlords. A consequence of imposing charges is landlords will likely pass the cost on to their tenants which seems to be counterproductive.</p>	
<p>The council should focus on other priorities</p>	<p>It does not need legislation by the local council, concentrate on keeping the streets clean etc! Which has a much greater degree on the happiness of our area.!</p> <p>Lewisham Council is not competent enough for a scheme like this, you will end up bankrupting people, you should rather focus on cleaning the streets and graffiti, as you do not have a simple handle on this even. More Governance does not solve bad governance, you have the tools you need to tackle this, your just incompetent.</p>	<p>The council has a reporting service for fly tipping and graffiti available on the council website here, and has recently introduced new public notices around the borough raising awareness of on-the-spot fines for fly tipping.</p> <p>The council believes that selective licensing is a useful tool to meet the objectives of Lewisham's corporate strategy and would help to bring about the much-needed improvement in conditions for people living in the private rented sector.</p>
<p>The council should target bad landlords</p>	<p>You are proposing on financial burden on all landlords rather than the ones who do not meet standards. You do not have enough properties and cannot afford them and in all the tax changes, private landlords are being forced out. This does not help. What you need to do is start with problem landlords which from the press includes some of the housing associations.</p> <p>The licence fee would be punitive for good landlord like myself who also by the way is an accredited Landlord and a paid of member of National Landlord's Association.</p> <p>Tax the unfit landlords and the the fit and hardworking ones who take good care of both their tenants and the properties they live in.</p> <p>It will make private landlords pull out of the rental market as Licensing would be burdensome and expensive. It would also deter buy to lets generally and dampen the market leaving few alternatives for private renters. It is also unclear on the frequency of any licensing.</p> <p>How will licensing help poor housing when the some of the poor housing in the private sector is actually run and managed by the council (PSL).</p> <p>Rogue landlords should be reported by tenants, property inspected and then fined heavily... Licensing is just another</p>	<p>If approved, the Council will carry out inspections under the new scheme to find unlicensed properties and will take action against those who refuse to licence their properties.</p> <p>An independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing) found that licensing "provides a clearly defined offence (licensed / unlicensed) which simplifies enforcement - and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences". The council believes that licensing will enable them to work with landlords to raise standards of living in the borough and work to tackle the issues of poor property conditions, and ASB, by holding landlords to a high standard, and by carrying out inspections.</p> <p>Alongside the enforcement powers granted by licensing, the Council will also carry out a comms campaign to make landlords, tenants and residents</p>

Theme	Example Comment/Question	Council response
	<p>bureaucracy measure which costs money and on paper look good.</p> <p>I feel Lewisham Council should target Tenants and Property residents for any antisocial behaviour issues. For properties where standard of living needs to be improved, Lewisham should tackle the individual landlords at fault directly.</p> <p>Setting up a licensing scheme will unnecessarily add huge cost and bureaucracy to the letting process.</p>	<p>aware of the licensing schemes, and raise awareness of how to report issues.</p>
<p>The designated areas should be different</p>	<p>I believe that Designation 1 has the greatest need for regulation to protect legitimate tenant rights whereas in Designation 2 think it is less likely. In Designation 3 the housing stock is generally in good repair, and I am not aware of any real tenants' rights issues in the area that are not already covered by existing legislation. The costs to landlords are another hit post Covid and now facing huge energy price rises.</p> <p>The focus between the areas is not necessary and will add confusion to the type of license</p> <p>In addition this approach may have the unintended consequence of simply rotating the problems around the borough</p> <p>With the ward of Ladywell surrounded by wards that are designation 1, I think it would be appropriate to include Ladywell in designation 1. Ladywell is only 5 reports of ASB behind New Cross which is designation 1. Given the geography of the wards in Designation 1 and 2, I am concerned that ASB may move from one ward to the next. I don't think that, given these arguments, and Figure 24 of the stressors report, it is justifiable to have Ladywell as designation 2, it should be designation 1.</p> <p>All areas mentioned above requires work in all areas within consultation. I've lived in areas within all designated areas over the last few years. I would recommend looking at ASB for designation three, it really is a poorly kept area and the general low living conditions reflect this, all areas in this third section are generally not nice areas, even to travel through. It's easily one of the most deprived areas in London.</p> <p>The designations seem to look like they are addressing the needs of those wards. However, my concern is that the scope of these licensing designations isn't going to reach the rental sector where it desperately requires stronger licensing and that is the rapidly increasing development of HMOs in many of the wards listed,</p>	<p>As stated above, the council can only introduce selective licensing in areas in the borough where there is evidence that the area meets the criteria as laid out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015.</p>

Theme	Example Comment/Question	Council response
<p>Unclear how licensing will address ASB</p>	<p>particularly in those wards in designation 1, who are currently experiencing the most rapid increase in these types of rentals.</p> <p>As a resident my main concern is rapidly increasing antisocial behaviour. It is not clear how licensing landlords will manage this - unless landlords will be mandated to manage tenants' behaviour.</p> <p>As a human being I am committed to the principle that everyone should have safe housing. This approach will hopefully improve the standards of rented property in the area.</p> <p>I cannot find the model ASB policy so therefore I am unable to comment on it. A general search of your website does not reveal it. I would welcome a policy that everyone has to include in their tenancies if it can result in the removal of tenants displaying anti-social particularly those connected with drugs</p> <p>Antisocial behaviour is not the fault of the landlord so why punish the landlord with extra costs with this licence? I feel the understanding of ASB needs to be addressed within the community, such as youth clubs and appropriate support for the youth of today before they become adults and encourage them to be more responsible and respectful. 'It takes a village to raise a family'. Just by adding yet more tax for a landlord to pay out, it will do nothing for the person involved in the ASB.</p> <p>Living conditions - absolutely yes. And fines for failing to comply. And then forced to sell if it's not suitable accommodation.</p> <p>ASB is not a result of housing condition, very bizarre no-evidence conclusion. There is already legislation in place to deal with poor housing conditions.</p>	<p>As with the council's additional licensing scheme, there will be a public-facing email address where residents can report unlicensed properties and associated issues.</p> <p>Currently the email address is PSHE@lewisham.gov.uk, however the council is working on improvements to our external communications on licensing, and this email address may change. The updated email address will be publicised on the council's website</p> <p>Selective licensing will address ASB through the licence conditions. The aim of the conditions is to make tenants aware of unacceptable behaviour and provide clear guidance on how to deal with complaints. The licence conditions that address ASB are:</p> <p>11. The licence holder shall put in place written ASB procedures detailing how complaints made to the licence holder will be dealt with, a copy of which shall be provided to the tenants in the information pack. The licence holder shall within seven (7) days of any demand by the council provide their written ASB procedure.</p> <p>12. The Licence Holder must ensure that all reasonable and practicable steps are taken to prevent and deal effectively with anti-social behaviour [ASB] resulting from the conduct of occupiers or visitors. The Licence Holder must comply with the requirements of paragraphs (a) to (f) below (If the Licence Holder has an agent, it is still the Licence Holder's responsibility to ensure their agent acts on their behalf in compliance of the conditions):</p> <p>a) The Licence Holder must ensure that the occupiers are provided with a document advising them (amongst other things) what behaviour is not acceptable, that they are responsible for the conduct of their visitors, the impact on the victims and local community, and of the consequences of ASB to their tenancy.</p>

Theme	Example Comment/Question	Council response
		<p>b) The Licence holder will take appropriate measures up to and including the service statutory notice and eviction to deal with anti-social behaviour. Where ASB includes criminal offences, the Licence holder will involve the police.</p> <p>c) Any letters, emails, legal notices or other documents relating to ASB, which are sent or received by the Licence Holder, or the agent on behalf of the Licence Holder, must be copied and kept for 5 years by the Licence Holder.</p> <p>d) The Licence Holder shall co-operate with the Police and Authority in resolving ASB in any licensed property under their control. Such co-operation includes attending or being represented at any case conferences or multiagency meetings and providing information to the Police or the Authority when requested.</p> <p>e) Any correspondence, letters and records referred to in conditions (a) to (e) must be provided by the Licence Holder to the Authority within 28 days on demand</p>
<p>Unclear how licensing will address issues outlined in the proposals</p>	<p>I do not think any scheme of this nature has made any impact on improving conditions. I think the council should be required to show how such licensing will improve these "conditions" and what the council will do to enforce them and hold rogue landlords to count. How can the council ensure that you will not just push rogue landlords underground?</p> <p>I think the issues mentioned are real, but I actually do not know about details or if the suggested solution is worth the cost which will be passed on. I simply lack good information.</p> <p>It is not clear how the selective licensing scheme will combat the problems listed in question 5. The scheme seems to be a tick box paper exercise that the is recognises some of the issues but does not demonstrate the alleviation of them and therefore becomes and additional cost for those who do manage their properties properly.</p>	<p>The recent Government research 'An Independent Review of the Use and Effectiveness of Selective Licensing' found that selective licensing can be an "effective policy tool" that can achieve demonstrable positive outcomes, and it also found that licensing "provides a clearly defined offence (licensed / unlicensed) which simplifies enforcement - and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences". The council believes that licensing will enable them to work with landlords to raise standards of living in the borough and work to tackle the issues of poor property conditions, and ASB, by holding landlords to a high standard, and by carrying out inspections.</p>
<p>Use existing powers</p>	<p>There's no evidence introducing these licenses will resolve these issues. It's just more bureaucracy. The council homes are in worse conditions than privately rented properties. It's all over the internet.</p>	<p>The council have considered a range of alternatives to selective and additional licensing, but do not believe they are as effective in dealing with poor property conditions, deprivations and ASB in the borough. The current powers the council has, including the use of the</p>

Theme	Example Comment/Question	Council response
	<p>The council needs to reduce "nannying" of the residents. There are already processes in place for reporting these issues to the relevant authorities.</p> <p>The questions the council are too vague to be of any value. The key consideration that council is avoiding is the extent to which tenants are responsible for the problems that it perceives in the private landlord sector. It seems to me that the council being biased in its questioning and its proposal and in fact believes that private landlords are at fault for all of these problems. This is neither credible nor a fair conclusion. Until the cause of the problems has been established equitable and effective solutions cannot be found. I suspect the council is trying to put the responsible for sorting out the problem on the private landlords when in actual fact the council already has the tools at its disposal to remedy problems but it has been ineffectual in its use of them.</p> <p>The council have all the powers and access via land registry to find out which landlords and tenants are acting in an anti-social way</p> <p>The idea that private renting occupants, create more litter and are more antisocial is discriminative and unfair. There are enough laws in housing legislation to make sure landlords provide safe and good quality housing.</p>	<p>Part 1 Housing Act 2004, do not require landlords to declare themselves. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months.</p> <p>In addition, any service which relies on tenants coming forward to make complaints is likely to fail in the current market conditions, whereby many renters are afraid to make official complaints and risk losing their accommodation. It is therefore extremely important to place a proactive legal duty on landlords.</p>
More enforcement	<p>This depends on (as with other issues within Lewisham) on whether there is proactive enforcement. Something that has been lacking</p> <p>The council need to focus on enforcing licenses if this scheme comes in. They also need not lump responsibility for anti-social behaviour on a landlord who will find it very difficult to evict an anti-social tenant. a judge is not going to grant possession to a tenant because they've got rubbish in the front garden.</p> <p>I think more enforcement and active inspections need to take place.</p> <p>Lewisham's general enforcement background over the last three years is significantly low compared to other London authorities. Landlords will likely view the introduction of selective licensing as the "nuclear option", which the council should and is likely to be mindful of.</p>	<p>If the schemes are approved, the Council's enforcement capability will be increased in line with the number of licences, including pro-active compliance checks. The council will be actively inspecting for unlicensed properties and will take action against those who refuse to license their properties.</p> <p>The council's enforcement activity has been misrepresented in several places. In fact, between April 2020- March 2022 Lewisham Council have issued 38 civil penalties and secured 10 convictions against landlords for Protection from Eviction and Environmental Protection Act offences. This compares favourably with other London councils.</p> <p>In addition, between 2018 and 2022 the Council's Rogue Landlord Team also prevented 233 illegal evictions. The council is currently prosecuting 3 cases</p>

Theme	Example Comment/Question	Council response
		<p>in which the landlord is accused of illegally evicting or harassing their tenants, along with two further prosecutions for other offences. Lewisham is one of the few councils in London which pursues convictions for illegal evictions.</p> <p>Selective licensing will very significantly help to support the council's already proactive enforcement activity by helping to raise basic levels of compliance and providing a simple enforcement framework for all properties.</p>
Rents will increase	<p>The landlords will simply add these fees directly to our rents, you are about to make renting in Lewisham even harder for the residents with the least economic choices. Crowding will get worse, landlords will spend less on repairs, and then the council will pat themselves on the back, because you will pass the cost of regulation onto the landlords, who will pass it on to tenants, with the end result being pure gentrification. This is a terrible, terrible idea!</p> <p>concern that the licencing fee will be passed onto tenants making renting in London more expensive</p> <p>As a responsible landlord this scheme is just a way for the council to raise funds. Lewisham's issues cannot be blamed on Landlords. This scheme will encourage rents to rise & eventually decent landlords to leave the market. The council needs to start improving the social housing they rent out.</p>	<p>As stated above, the council have seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere, and this is similar to the findings from other authorities who have also been operating licensing schemes. Similarly, research carried out by an independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing) showed that selective licensing did not result in an increase in rents in areas with a scheme, that market forces dictated the rent levels.</p>
The council should deal with ASB another way	<p>I would love to see landlords taking responsibility for their properties. I understand that safety within the properties and externally will be improved. Some ASB will be alleviated but it is naive to assume that ASB and overcrowding Will be eradicated quickly. ASB has multiple causes. There could be an increase in homelessness or people being forced to move out of area with children's education at risk. And more burdens on single parent/low-income households most likely putting pressure on women who have already paid for austerity and been adversely affected by the pandemic. How carefully has the council looked into the impacts and equity for the tenants in this discussion? Draconian H&S driven Rules and benchmarks may not be appropriate in the wider safeguarding and welfare contexts of Lewisham.</p>	<p>The council is addressing issues relating to ASB in a variety of ways, and selective licensing is part of this approach.</p> <p>Selective licensing will address ASB through the licence conditions. The aim of the conditions is to make tenants aware of unacceptable behaviour and provide clear guidance on how to deal with complaints.</p> <p>The council has more information on its website about reducing ASB and youth offending here</p> <p>The council has also produced an anti-social behaviour toolkit available on the council's website here and has</p>

Theme	Example Comment/Question	Council response
	<p>Could there be consideration of the desires and needs of existing tenants before imposing change on landlords? Changes that may mean uprooting of community networks such as happened in Deptford in post war era. Engagement and understanding of tenants is vital in this process. Otherwise, what is conceived as designed to protect tenants may feel as if it's a punishment.</p> <p>I think this is a step in the right direction, but there are two separate issues here - (1) the poor living conditions rental tenants are subjected to, and (2) antisocial behaviour (which may in some cases be linked to housing conditions, but not always). I do not live in rented accommodation, but I support in principle any measures to improve conditions for those that do. I don't think these measures will be in any way adequate to tackle antisocial behaviour in the borough. Landlords are not responsible for the behaviour of their tenants (and those responsible for antisocial behaviour are not necessarily living in rented accommodation).</p>	<p>also produced resources for landlords to deal with ASB as part of its HMO licensing schemes which are available here</p>
<p>How will it be monitored?</p>	<p>How will monitoring private landlords be implemented?</p> <p>I wonder how and if this will be monitored</p> <p>I'm unclear whether this scheme is mandatory for all landlords and what happens if they don't comply. The value will be in the penalties for not doing what's asked - i.e., landlords banned from renting if their houses not up to scratch. And does the council have the resources to check?</p>	<p>If the council is successful in introducing the proposed scheme, the council will be required to evidence its impact in order to demonstrate whether there is a case for renewing the scheme after five years. Changes in the baseline data will therefore be kept under review.</p>
<p>Include HMOs</p>	<p>HMOs are the issue, not single occupancy dwellings! Article 4 protection needs to be given to the Corbett estate</p> <p>Again, it would be helpful to see more action on HMOs in Lewisham Central (to become Hither Green) - particularly on Littlewood Road</p> <p>I have read with dismay on my local social media sites the amount of HMO properties that have been made or in the process of being made having circumnavigated planning permissions. 'Tenants' are then installed and as a result areas are being blighted by anti-social behaviour and crime to name but a few. These are very disturbing comments to read.</p> <p>I hope Lewisham are serious in these proposals to reinforce and follow through. Law abiding residents who are paying their council tax deserve to enjoy a decent standard of living in their homes and areas without dodgy HMOs appearing in their areas without consultation.</p>	<p>As stated above, the council introduced an additional licensing scheme in April 2022, which covers small HMOs (with 3-4 sharers) in addition to the existing national mandatory licensing scheme for larger HMOs (5 plus sharers).</p> <p>Properties covered under the HMO licensing scheme are also required to meet licence conditions to be given a licence, and if landlords run an unlicensed HMO in a licensed area, they could be subject to enforcement action.</p> <p>The conditions for HMOs are available via the council website here and they address minimum room sizes and maximum occupancy, health and safety, refuse and pest control.</p>

Theme	Example Comment/Question	Council response
		As set out above, in June 2022 Lewisham Council's Housing Scrutiny Committee agreed to recommend the extension of the existing Article 4 Direction to the remainder of the borough not currently covered. This means that permitted development rights for the change of use from a dwelling house to a small HMO will be withdrawn, and those wishing to undertake such conversions will need to apply for planning permission.
Overcrowding is an issue	<p>No mention of overcrowding. Some houses are being converted into HMOs with the space for each renter no bigger than a cupboard</p> <p>Overcrowding is a major problem on New Cross Road SE14, which means there's too many people living in flats for the rubbish facilities provided. So, the street is filled with overflowing bins, litter, fly tipping and rubbish-filled gardens all the time. The footpaths are all stained from leaking rubbish. Bins get stolen frequently, making the situation worse. Since the bins are constantly full, they're never put away, so the footpaths are blocked by wheelie-bins 7 days a week, which is obviously an eyesore and also a danger for pedestrians. It also encourages fly tipping, people just dump mattresses, refrigerators, broken furniture or electronics on our footpath. Honestly, the street is often so filthy it doesn't look out of place. In some cases it may not be overcrowding - just students or young tenants who don't care perhaps, landlords that do nothing, and there's just no penalty or system in place to improve that situation. If this license could help deal with the rubbish situation on New Cross Road, my business and the many other businesses on the road would benefit greatly and it would be a much safer and nicer place to work and encourage business into the area.</p>	<p>HMO licensing in Lewisham began in April 2022 and the licence conditions include minimum space and maximum occupancy conditions for each property, as well as guidance on pest control and refuse. These are available for reference on the council website here.</p> <p>The proposed licence conditions for selective licensing also include conditions for waste management and refuse.</p>

Comments about alternatives to licensing

Theme	Example Comment	Council Response
Do nothing	Nothing new needs to happen. Leave it as it is.	

Theme	Example Comment	Council Response
	Do nothing	The evidence presented in the evidence pack available via the council website here demonstrates that additional measures are needed to raise standards in the private rented sector and this cannot be achieved under the current arrangements. Lewisham's current schemes specifically target HMOs and do not cover studios and single-family households. Officers have experienced a significant amount of resistance from landlords who dispute that their properties fall within the requirements of either the mandatory or additional licensing schemes. This has meant the process to license properties to date has been very labour-intensive, focusing on proving the case, sometimes through court, rather than tackling disrepair and poor landlord practice.
Experienced issues with fly tipping	<p>Lewisham Council to be serious about fly tipping on public and private grounds.</p> <p>Lewisham Council to provide proper planning/building consent as inadequate housing has been allowed in neighbourhood with shoddy building works</p> <p>the specific issue of fly tipping is a huge issue in Lewisham-managing private landlords will not resolve this issue. a dedicated larger team needs to be managing this</p> <p>The council needs to be managing and monitoring provisions made to house people rather than these grossly inhuman for profit landlords altering properties to cram in large numbers of vulnerable people into inhumane housing conditions.</p> <p>Selective Licensing only applies to the standard of the property, it doesn't deal with the people who live there. Career landlords who buy properties and turn them into HMO's can easily pay nominal fees to the Council. But what about the residents who have to live next to these houses? Who is protecting their interests? The council must find a way to limit or disincentivise HMOs in Lewisham because this can't go on.</p> <p>Raise threshold for number of properties to be licensed to say three or above. Private landlords with one of two properties to let will generally meet standards especially if using managing agents,</p>	The council is aware of issues with waste disposal and refuse, and selective licensing would help to address these through the licence conditions.
Focus should be on tenants to address ASB	Improvements in property does not equal improved human behaviour. There are already many avenues for tenants to report bad housing and rental mismanagement and I am of the opinion that the pendulum has swung too far in favour of the tenant having	Under the Housing Act 2004, part 3 Section 90 (6) "A licence may not include conditions imposing restrictions or obligations on a particular person other than the licence holder unless that person has

Theme	Example Comment	Council Response
	<p>had my property damaged and items stolen with little recourse from the tenants deposit scheme.</p> <p>I think Lewisham Council need to focus on regulating bad tenants who affect housing provisions within the area as such damage to a property, anti-social behaviour, non payment of rent etc</p> <p>An alternative would be to have the tenant to have as many restrictions and sanctions as the landlord so if anti-social issues are raised the landlord has the right and support from the local authority to remove said tenants.</p> <p>Licensing does not solve ASB or poor housing conditions. To solve the former, there needs to be proactive policing that responds to complaints from residents & landlords and an accelerated process for eviction for persistent/ serious offenders. To solve poor housing conditions there needs to be a system of inspections, which take into account the tenants behaviour and lifestyle as it contributes to poor housing as well as the landlord's inaction. In the event that a tenants behaviour contributes to poor housing such as not opening windows leading to mould, failing to cut grass or leaving food for pests, breaking windows, doors, losing keys etc. that should be grounds for eviction or the council should have a mediation service to ensure the tenants understand the consequence of their actions and a programme where a landlord can claim from a central fund for repairs to damage caused by a tenant in return for not evicting them</p>	<p>consented to the imposition of the restrictions or obligations.”</p> <p>The council is addressing issues relating to ASB in a variety of ways, and selective licensing is part of this approach.</p> <p>Selective licensing will address ASB through the licence conditions. The aim of the conditions is to make tenants aware of unacceptable behaviour and provide clear guidance on how to deal with complaints.</p> <p>The council has more information on its website about reducing ASB and youth offending here</p> <p>The council has also produced an anti-social behaviour toolkit available on the council's website here and has also produced resources for landlords to deal with ASB as part of its HMO licensing schemes which are available here</p>
<p>Incentivise landlords/ work in partnership</p>	<p>Using a licence is a bit of a blunt instrument. Incentivising landlords to refurbish properties through more council tax holidays or equivalent would be another way to get targeted improvements where they are needed.</p> <p>I miss the other half of the solution which is providing grants and financial help to the landlords in order to improve the condition of their houses. I think it is good that specific licensing will give power to the borough to force the landlords to improve their investments, so it is better for the people who live there, but I also think it is important to motivate the landlords not just force them.</p> <p>If the purpose is to help the most deprived in Lewisham, why doesn't Lewisham council look to partnering with landlords to bring properties up to scratch, build suitable properties.</p> <p>Introduce a voluntary code of practice with compliant landlords being able to advertise that they are compliant. Those who chose not to register open themselves up to questions by potential renters as to how deficient they are</p>	<p>The council aims to support landlords to ensure that properties rented out are safe and to a good standard.</p> <p>The council is committed to improving its communications with renters and landlords alike and will be publicising the scheme and its outcomes using our communications channels and the local press. If the licensing scheme is introduced, the council proposes to increase the landlord forums and support events, with help and guidance for dealing with anti-social behaviour as part of the programme.</p> <p>Grants are available to landlords to bring their property up to the decent homes standard, to resolve any category 1 or 2 hazards which have been included on an Improvement or Prohibition Notice</p>

Theme	Example Comment	Council Response
	<p>Just do some random visits in the targeted area. Unfair to add some burden on all tenants for 10-20% not meeting a minimum set of standards.</p> <p>Also give green grants based on the improvement of the grade of the EPC certificate post and prior to changes instead of making them impossible to use.</p>	<p>served by the council, and to provide adequate kitchen, bathroom and/or amenities as required within a licensed HMO or to provide 270mm loft insulation and cavity wall insulation (where appropriate). More information on the grants available to landlords can be found on the council website here</p> <p>Accreditation schemes are currently voluntary. The council wants to acknowledge the good practice of landlords who are accredited, and if the scheme is approved, accredited landlords would receive a discount to their licence fee. However, accreditation, while an indication of good intentions, is not a guarantee that the landlord is fully aware of their obligations or that the properties they manage will necessarily be up to standard without greater involvement from the Council.</p> <p>The council is currently working closely with London Councils, and other London boroughs, as well as the GLA, on initiatives to improve energy performance in privately rented properties and to discharge its duties under the Minimum Energy Efficiency Standard regulations more effectively.</p>
<p>Increase police presence/ enforcement</p>	<p>We feel there should be more police presence on the streets in Lewisham to tackle anti-social behaviour, and the council should put more resources into dealing with Rouge landlords.</p> <p>Post more community police in target areas to be more visible and do more to provide play spaces and activities for younger generation</p> <p>More police, proper intervention by Lewisham council when they are told off anti-social behaviour, what will they be doing with their own council tenants in this scenario</p> <p>Entire Area. Council/police take action against those tenants. Having a licensing scheme won't stop this behaviour. If a tenant is a nuisance a landlord could start eviction if appropriate. However, the law is heavily in favour of the tenant</p> <p>Police resources and access to dispute resolution services should be increased and inspectors should focus on known problem areas. Making the 'good' suffer along with the bad is a blunderbuss approach and not a solution. Landlords and tenants should be</p>	<p>Changes to community policing are not within the remit of a selective property licensing scheme. However, the council is committed to working effectively with all public sector agencies to tackle crime and anti-social behaviour.</p>

Theme	Example Comment	Council Response
	encouraged to follow best practice and resources should instead be focused on increasing the council's ability to respond and deal with abuses - impacting both landlords and tenants.	
Invest in social housing	I like your current policy of offering a long term management service to private landlords, and think it should be extended; build more council houses; could you set up a council owned company that buys houses and rents them privately but affordably(I think I read about a scheme where a different London council was doing this?)	<p>The proposal to introduce selective licensing is part of a wider approach by the council to improve housing in Lewisham. As stated in the council's housing strategy, Lewisham Council is currently in the process of building new council homes for the first time in a generation. The Housing Strategy 2020-2026's first priority is to deliver the homes that Lewisham needs by building council-owned homes (which started in 2012), and its third priority is to improve the quality, standard and safety of housing in Lewisham, through an ambitious programme of works to improve the condition of our social homes and estates.</p> <p>More information on the council's housing strategy can be found on the council website here. However, whilst the council is building more social housing, it acknowledges that around 40 per cent of residents live in the private rented sector, and selective licensing will enable the council to bring privately rented homes that are unsafe up to a better standard.</p>
	Provide more social housing and affordable homes for purchase. Provide free waste collection so people stop dumping rubbish and an accessible dump.	
	It cannot be piecemeal. It has to be a national or London wide position. You cannot demonise a whole industry due to the actions of a few. And if there was no PRS, how would the council and governments house those that need it? There is very little social housing and the way in which it is managed across the board is shocking.	
	Those who have a full-time job should be able to rent from the Council, and not getting fleeced of all earnings by the Landlord. It's unfair to be paying up to £1500 pcm as rent for a 2-bedroom flat	
	Public housing for poorer tenants and overcrowded houses so that people are not displaced in the process.	
Issues should be dealt with separately and directly	Scrap the whole idea. Anti-social behaviour and poor living conditions aren't going to be helped by heaping additional costs on top of an already heavy financial burden.	<p>The council believes that selective licensing and the licence conditions will address ASB and poor living conditions.</p> <p>The current process of responding to complaints is very reactive and relies on residents contacting the council. The council believes that a proactive approach will have a greater impact on improving property conditions.</p>
	My suggestion would be to approach and resolve the issues with the individual landlords of the properties that are causing these problems rather than increase the cost for the vast majority of the private rented sector which is law-abiding and fit for purpose. These costs are inevitably passed onto the tenant in some way, normally via increased rental prices.	
License needs to be free/ affordable	<ul style="list-style-type: none"> - Stronger police presence to tackle ASB - If it is genuinely about improving, then the licence should be free so that the landlords can invest the money on the actual property - Not much tax to be paid by the landlords so they can invest more in the properties 	<p>The licence fee has been set to cover the costs of the scheme, as required by law. The council does not believe that the fee is unaffordable for a five year licence and is comparable and cheaper than other selective licensing fees for councils in London. The full fee of £640 works out to £2.46 per week</p>
	I've answered yes – but rather than an alternative, I think you need to price the scheme so that it is affordable and doesn't put people	

Theme	Example Comment	Council Response
	<p>off applying and then renting their property is “of grid “– which would really only add to the safety issues.</p> <p>I do not think that the selective licensing system should be a huge financial burden on landlords but if it results in good standards for tenants, I am fully in favour of it. However, if it is expensive, it will be removing funds that could be spent on maintaining the properties</p> <p>Do a visit to the property without adding a charge to the landlord.</p> <p>You should find a way to perform monitoring of the troublesome properties and set limits on the number of tenants that can live there as well as perform identity checks of tenants. The cost of 640 GBP is outrageously high for responsible landlords that are not in breach of any laws. The landlords that pay would not see any discernible benefits. How has the figure even been calculated? I strongly disagree with the proposal.</p>	
<p>Private tenants should report issues and be helped with reporting Landlords/ private tenants should be educated on their rights</p>	<p>Yes, make it easier to report illegal landlords, poor housing conditions etc, there is nowhere near enough protection to tenants to report these landlords, the LA has to give the tenant alternative housing, so they have the confidence to report rogue landlords. Some of the poorest conditions are often provided by housing associations.</p> <p>Investigate and take action when complaints are received from Tenants and Landlords. Encourage the local Police to take action when complaints of anti-social behaviour are reported. Carry out inspections on properties that are believed to be substandard. Ask Landlords on a random basis to produce certifications required for their rental properties and upload them to a secure website when asked to do so.</p> <p>Make aware the existing process in place and how tenants can help themselves. Educate them of channels to report antisocial behaviour, or how to report noncompliance.</p> <p>Introduce a live feedback system where tenants can report underperforming/bad landlords and management agents and introduce penalties for these individual landlords/agents. I am not sure how you would police the SLS and how this would identify these bad landlords going forward.</p> <p>Yes, introduce a redress scheme, so that tenants can register a call with the council if they feel there is a problem and the council can refer to a landlord register. licensing requirements will be ignored by the irresponsible landlords that offer inadequate</p>	<p>The council provide information for landlords and tenants on their responsibilities. This information is available on the council website here - Lewisham Council - Advice for private tenants</p> <p>The council also believes that the introduction of selective licensing and the use of the licence conditions make clear what is expected by landlords so clear to both parties</p> <p>Any concerns about unlicensed properties, or other issues relating to privately rented homes should be reported to pshe@lewisham.gov.uk and an officer will be assigned to investigate. The council is currently reviewing its external communications tools for licensing, meaning this email address may be subject to change. Please visit the council website for up-to-date information.</p>

Theme	Example Comment	Council Response
	conditions whilst imposing new administrative and bureaucratic costs on those that already provide decent homes. Lewisham should not interfere or determine what constitutes good/bad provision in the private sector.	
Reduce government intervention	<p>The alternative is to let the free market do what it does best, and match buyers to sellers unencumbered by Big Government interference.</p> <p>too many regulations, communism! The government is taking control of everything, where is the free market?</p>	<p>The evidence shows that there are persistent issues with poor property conditions, deprivation and ASB in the borough. Whilst the council understands that many landlords keep their properties to a high standard, there are many who are either not aware of their responsibilities or are ignoring them. Licensing would enable the council to work proactively with landlords to bring up the standards in the properties</p>
Rent controls need to be in place	<p>I think the licensing does not go far enough. I strongly believe that all private landlords should require licences for the reasons given in the proposals, and more. Housing is a right, and nobody should profit from it while some live in substandard conditions (and many don't have a home at all). If private landlords must exist at all, then the absolute minimum they can do is provide good quality housing, especially in the most deprived areas. Furthermore, I strongly believe that the costs of renting should be heavily regulated, and affordable. Once again, nobody should profit from housing whilst other people have no home.</p> <p>The council should also do everything in their power to control over inflated rents.</p> <p>Just to reiterate, I think there's an urgent need for nationwide rent controls across London - and the country.</p> <p>Lewisham should start regulating rent increases and the length of contracts. Private landlords only do 1-year contracts and then increase the rent substantially every year, until they price tenants out of the property. At the moment, it's not possible to plan to live long term in the area as a renter. Price increases have been substantially above inflation and pay increases.</p> <p>We need rent control to prevent the most vulnerable from being exploited and living in unsuitable accommodation. This should be considered in addition to licensing</p>	<p>The council does not have the authority to impose rent controls on private properties in the borough.</p> <p>With regard to improving security of tenure, central government are currently consulting on proposals to amend private sector tenancies and make them indefinite, as opposed to time-limited. Lewisham Council supports these proposals, which will strengthen renters' rights, help to reduce insecurity within the sector and have a stabilising effect on rent increases.</p>
Rented properties should be in good/liveable condition	<p>We believe every rented property should have to have a minimum standard and protocols in place for reporting works. All landlords and managing agents should be held to account. On the flip side all tenants should be forced to adhere to rules more rigorously and communicate openly to their landlord or agent. Landlords should</p>	<p>The council believes that all properties should be safe and decent for their inhabitants, which is why improving the quality, standard and safety of housing in Lewisham is a key priority of the council (Housing Strategy 2020-2026) and believes that by introducing</p>

Theme	Example Comment	Council Response
	<p>not be able to let u fit properties and tenants should not be able to withhold rent without valid reasons.</p> <p>private rented accommodations are extremely expensive especially for what you are getting. it should be mandatory that all homes are sufficient for each tenant to live in.</p>	<p>selective licensing and working with landlords and landlord associations to improve standards and practice across the borough, we can work towards this aim</p>
<p>The council should deal with issues arising from social housing properties first</p>	<p>The council should first consider whether it is doing everything it can to address issues with overcrowding, poorly maintained properties and anti-social behaviour in its own properties first</p> <p>I'd rather have the Council looking after the properties the Council owns or manages.</p> <p>I'd rather have the Council provide help to the impacted tenants or landlords, dealing with renting disputes.</p> <p>Being a landlord is already really expensive - and the cost of this license will be passed onto tenants and increase poverty rates or will reduce the number of landlords and drive-up rents, which is exactly what you don't want to happen. If you want to tackle poverty, do something that works, like, hm, I don't know, offering more affordable social housing to more Lewisham residents and regulate the conditions there. The only antisocial behaviour in our neighbourhood comes from the council estates.</p>	<p>As stated above, the council is in the process of building new council homes for the first time in a generation and has an ambitious programme of works to improve the condition of social homes and estates. Selective licensing is part of a wider programme of work to achieve the council's corporate strategy and improve the quality standard and safety of housing in Lewisham.</p>
<p>The council should focus on other/ additional initiatives to respond to issues in the housing sector</p>	<p>I think the proposal will make it harder for people to rent in the private sector. I think the council should not charge for collecting rubbish that is too much for the normal collections- this might reduce fly tipping</p> <p>I suggest the council should talk to people who own office blocks and start to convert them into affordable homes. Who wants to live in one room? What incentive is that for anyone to make something of themselves and care about their community.</p>	<p>As stated above, around 31 per cent of the households in the borough live in privately rented accommodation. The private rented sector plays a very important role in housing in the borough, and the council does not want to make it harder for people to rent. The aim of selective licensing is to ensure that rented properties are in a good and safe condition.</p>
<p>The council should focus on other priorities</p>	<p>Give young people other opportunities to let their energy be released and to meet, e.g., community centres, playgrounds, athletic areas. By enforcing a license, you will raise the standard of properties and get rid of bad landlords, BUT you will also scare off good landlords or at best increase the rents we need to charge towards tenants. That will also decrease anti-social behaviour but because you are driving people away from Lewisham due to increased rents - which should not be considered a successful outcome. The capital is already too expensive for essential workers to live in.</p> <p>As before. Open up youth centres, invest in training more, more community taskforces...go back to the streets and out of your</p>	<p>The council have a priority aim of reducing anti-social behaviour and youth offending. The Lewisham Youth Justice Strategic Plan sets out the partnership approaches which will be taken to addressing youth crime in Lewisham. These include:</p> <ul style="list-style-type: none"> • Trauma-informed practice – Lewisham YOS is recognised by Department for Education as 'a trauma informed service' meaning it is a relationship and trauma based model delivered as a direct intervention and as a workforce development program.

Theme	Example Comment	Council Response
	<p>offices. Labour values were once attractive many many years ago. Completely unrecognisable now.</p> <p>For the entire are, you could consider:</p> <ul style="list-style-type: none"> - placing more bins in the area and emptying them more frequently - more and better areas for young adults and children to spend time and relax in - strengthening the powers of the tenants' ombudsman <p>- when assessing conditions, ask the landlord for before photos of the property with proof of date taken against the state of the property now as it's not always landlords who don't update the property, sometimes tenants mess up the property</p> <ul style="list-style-type: none"> - anti social behaviour: open up the youth centres again so people can have an outlet. Have recognisable community leaders who people respect to manage the area. - raise living conditions by maybe helping landlords with discount on cleaners for their properties 	<ul style="list-style-type: none"> • Lewisham YOS is now a Functional Family Therapy Community agency accredited to deliver the program on sight. • Lewisham YOS has led on developing restorative approaches both internally and through MOPAC funded schools based work to address county lines and Serious Youth Violence at a preventative level. • Lewisham YOS continues to lead regional and national best practice development for custody and resettlement into the community focussing on health, social care and education. • Ensuring compliance with National Standards and meeting the actions as set out in the Lewisham YOS National Standards Audit Action Plan. • Improving sentence planning, risk management and safeguarding practices when young people are placed in any secure setting. • Improving the timeliness and quality of assessments and intervention plans, using the new ASSET Plus Assessment tool. • Ensuring that appropriate plans are put in place to safeguard young people at the start of their Order and that approaches are made in partnership with other relevant agencies, responding to new information as it emerges. • Increasing the range of alternative education provision available for young people to access as an alternative to custody or post custody. • Further developing the out of court disposal interventions that are provided. <p>More information on this can be found on the council website here including the metrics for success</p>
<p>The council should focus on specific properties/ types of properties</p>	<p>Compliance checks to landlords where complaints are received ASB where Neighbourhood Officers report it</p> <p>It should be focused on known properties that are already causing issues and it should be with the large housing associations or private landlords that are letting their properties go into disrepair. Its needs to be targeted not one size fits all.</p> <p>As already mentioned you need to go after these self-contained</p>	<p>The council does respond to complaints and will respond to complaints raised as part of the licensing scheme, which will increase the awareness of tenants of acceptable standards in privately rented properties.</p> <p>Whilst the council understands that many landlords keep their properties to a high standard, there are</p>

Theme	Example Comment	Council Response
	<p>flats with in bad condition not homes whereby someone lets out a room.</p> <p>Rather than capture all small landlords in a borough wide licensing, I believe it would be wiser to consider licensing on a case-by-case basis. This could be via a database harvested via a type of housing satisfaction surveys from tenants within single family dwellings.</p> <p>This shouldn't be applicable to HMO's, which should continue to be licensed due to the number of tenants in one single dwelling.</p> <p>Select specific areas/roads/estates where anti-social behaviour (ASB), housing conditions and deprivation are actually an issue.</p> <p>Grainger plc supports the exclusion of Build to Rent developments that meet certain criteria from the selective licensing regime. For example, a Build to Rent scheme could be excluded if it meets the London Plan definition of Build to Rent (unified ownership and management, 50+ units, subject to a Build to Rent covenant, all units self-contained and let separately, tenancies of 3+ years, on site management, rent and service charge certainty, complaints procedure, member of ombudsman scheme).</p>	<p>many who are either not aware of their responsibilities or are ignoring them. Licensing would enable the council to work proactively with landlords to bring up the standards in the properties.</p> <p>Licensing is also an effective tool for addressing rogue or criminal landlords in the borough.</p> <p>The council has no plans to exclude purpose-built rental developments from selective licensing, in common with the approach taken by other councils across London. As with our current additional HMO licensing scheme, we will have a bulk application process to reduce the burden of applying for a license on those landlords with multiple licensable units.</p>
<p>The council should have considered alternatives</p>	<p>I don't have this expertise, but I'd suggest that considering alternatives is an important part of any decision making process.</p> <p>I work as a designer - there is never just 1 solution to a defined problem. I would expect the council to have conducted due diligence on the options for solving the stated problems. As a resident and landlord, I would like to know about the other options (which could still include this scheme). That said, I like the idea of the scheme - but please do you due diligence and then get feedback.</p>	<p>The council did consider alternatives to licensing as part of the consultation preparation. The alternative considered can be found in the Evidence Pack here</p>
<p>The council should inspect properties</p>	<p>I KNOW IT WOULD COST MONEY BUT COULD SOME COUNCIL EMPLOYEES COME OVER AND DO REGULAR CHECKS ON MINOR THINGS such as : wrong or dirty items in recycling bins, rubbish left lying around, people who do not respect their ASBOS and go on feeding pigeons which create poo all over the place .</p> <p>Some people need only to be told .</p> <p>Or send a questionnaire with the council tax breakdown each year asking the relevant questions about the conditions of the property.</p> <p>Inspections and fines for both tenants and landlords</p>	<p>The council is planning to inspect properties over the lifetime of the scheme. The council also plans to raise awareness of acceptable standards and behaviour of both tenants and landlords, and provide support to both tenants, who may be facing unsafe property conditions that require repairs, and to landlords who may be dealing with difficult tenants</p>

Theme	Example Comment	Council Response
The council should suggest alternatives	<p>I would expect the Council to have researched why this is a good idea and to have considered any alternatives as part of that process.</p> <p>I don't think it's up to me to suggest alternatives to you. You need to review the evidence for licensing and other models to reduce ASB and raise living standards and rental property quality.</p> <p>I don't know, but the council should research and investigate all options before imposing something!</p> <p>Don't know if any alternatives hoping you do. More than one option should be considered</p> <p>Licensing scheme good to stop overcrowding or poor living conditions but council must implement the scheme well and follow up on bad situations</p> <p>Whatever system you finally adopt will be a toothless gesture unless you get an EFFECTIVE SYSTEM OF ENFORCEMENT to follow through if landlords fail in their duties. Do not make this another example of the 20mph limit in Lewisham – political grandstanding but never enforced. See Belmont Hill as one dangerous example.</p> <p>Whatever scheme you finally decide on, the most important response of the council will be about ensuring EFFECTIVE ENFORCEMENT of the licences. Please do not let this be another example of political grandstanding with no enforcement which has been the fate of the 20mph limit on Lewisham roads. See the dangerous Belmont Hill as an example.</p>	<p>The council outlined the alternative options to licensing it considered in the Evidence Pack for the consultation (available here) and concluded that they would achieve the same outcome as the proposed selective licensing scheme for the reasons provided. The alternative options would also not help meet the Objectives of Lewisham's corporate strategy and would not bring about the much-needed improvement in conditions for people living in the private rented sector</p>
There should be council support for other issues that cause ASB	<p>I think we need licencing, but I also think we need proper support for people with drink and drug problems, and monitoring and regulations of programmes that help house these people so that people with antisocial problems aren't all concentrated in one area (Catford south / Whitefoot)</p> <p>Because clearly housing is not sole cause of the issues listed above.</p> <p>Anti-social behaviour in the area is due to the council and the government failing to look after its poorest and most deprived residents. Private landlord are not to blame for the lack of support financially and socially for these individuals.</p>	<p>As stated above the council is working to address anti-social behaviour. The Lewisham Youth Justice Strategic Plan sets out the partnership approaches which will be taken to addressing youth crime in Lewisham. More information can be found on the council website here</p>
Unclear how licensing will address the issue	<p>The issues highlighted do not relate to private rented accommodation. They are simply issues relating to wider social economic factors.</p>	<p>While the Council acknowledges that all property types may have issues with property conditions, deprivation and ASB, licensing is a tool available for</p>

Theme	Example Comment	Council Response
	<p>You seem to assume that such licensing would improve things. Prove it.</p> <p>Because it is not at all clear from this document how your good intentions for rented properties are to be implemented and maintained</p>	<p>the Council to use to address these issues in the private rented sector.</p> <p>The recent Government research 'An Independent Review of the Use and Effectiveness of Selective Licensing' found that selective licensing can be an "effective policy tool" that can achieve demonstrable positive outcomes.</p>
Education for tenants and landlords	<p>Council can spend more time working with tenants to explain their responsibilities to the community and their landlord, i.e., avoid random damage to the property and respect neighbours</p> <p>Council officers dedicated to liaising between tenants and landlords, to promote discourse and to try and resolve disputes</p> <p>Not instead of Selective Licensing but as well as- Have consultation surgeries for tenants and landlords to help them understand their rights and advise on avenues for help.</p>	<p>The council website has resources for both landlords (here on the council website) and privately renting tenants (here on the council website). The council is also committed to providing better tenant-focussed communications and access to services and has recently undertaken some scoping work in partnership with Generation Rent on this issue.</p>
Reporting mechanism for tenants	<p>Perhaps a mechanism for tenants to report their experiences?</p> <p>I believe that the Council should have central reporting tools for these problems, which would record the names of landlords and social housing associations. This would allow the Council to deal directly with landlords to help resolve the problems. It would also allow the Council to release periodic reports of the rate of complaints and the rate of successful resolution, highlighting those landlords who are particularly good, or particularly bad.</p>	<p>As set out above, any concerns about unlicensed properties, or other issues relating to privately rented homes should be reported to pshe@lewisham.gov.uk and an officer will be assigned to investigate. The council is currently reviewing its external communications tools for licensing, meaning this email address may be subject to change. Please visit the council website for up-to-date information.</p>
Other	<p>Exclude live in landlords</p> <p>Require landlords to register with the NRLA and become a licensed practitioner.</p> <p>It should only be applied to houses, not small 1- or 2-bedroom flats</p>	<p>Live-in landlords, where the property is their main residence, are exempt from selective licensing under the Selective Licensing of Houses (Specified Exemptions) (England) Order 2006.</p> <p>The council does not have the authority to require landlords to join accreditation organisations.</p> <p>Selective licensing applies to the household size, regardless of the property size, under the Housing Act 2004</p>

Comments about specific Licence Conditions

Theme	Example Comment/Question	Licence condition	Council response
Managing ASB should not be the landlord's responsibility	I am concerned that the duty on landlords to tackle ASB could be manipulated by landlords to the detriment of tenants	11. The licence holder shall put in place written ASB procedures detailing how complaints made to the licence holder will be dealt with, a copy of which shall be provided to the tenants in the information pack. The licence holder shall within seven (7) days of any demand by the council provide their written ASB procedure.	The council understands that is the responsibility of all residents in the borough not to cause anti-social behaviour. The council do not expect landlords to be responsible for the behaviour of their tenants, but the council would encourage landlords to include clauses in their tenancy agreements about ASB, to follow the proposed licence conditions and to manage their tenancies and ensure that ASB caused by their tenants is effectively addressed and if necessary appropriate action taken. The council has an ASB policy available via the council website here , as a resource for landlords. The policy gives examples (but is not an exhaustive list) of ASB, such as: •Hate-related incidents (e.g. based on race, sexual orientation, gender, disability or belief) •Violence (e.g. Domestic or Physical)
	It is not for the Landlords to manage ASB, and where required due to these offences taking part in the property, the only option available to the Landlord is eviction, at which point Lewisham Council informs the tenant to stay in the property until legally evicted by the courts. Hence, therefore, Lewisham Council is part of the problem again bringing no value for the implementation of this stealth tax.	12. The Licence Holder must ensure that all reasonable and practicable steps are taken to prevent and deal effectively with anti-social behaviour [ASB] resulting from the conduct of occupiers or visitors. The Licence Holder must comply with the requirements of paragraphs (a) to (f) below (If the Licence Holder has an agent it is still the Licence Holder's responsibility to ensure their agent acts on their behalf in compliance of the conditions):	
	I think the condition to 'manage anti-social behaviour' leads a landlord, professional or accidental into the role of police officer, investigator, and judge. All without any real powers of punishment other than the lengthy eviction process and that cycle.	a) The Licence Holder must ensure that the occupiers are provided with a document advising them (amongst other things) what behaviour is not acceptable, that they are responsible for the conduct of their visitors, the impact on the victims and local community, and of the consequences of ASB to their tenancy.	
	What's to stop malicious ASB reporting so a landlord can evict a tenant. That should be seriously considered for proof of ASB. There should be a requirement that for the ASB element it must be proven by police to have happened and also the landlords own ASB should be considered. i.e. have they been causing nuisance to the tenants etc and if so should be subject to property forfeiture.	b) The Licence holder will take appropriate measures up to and including the service statutory notice and eviction to deal with anti-social behaviour. Where ASB includes criminal offences, the Licence holder will involve the police.	
	It is unreasonable to make the landlord responsible for anti-social behaviour by tenants. If tenants are causing a nuisance, then the Council should use its statutory powers to abate that nuisance	c) Any letters, emails, legal notices or other documents relating to ASB, which are sent or received by the Licence Holder, or the agent on behalf of the Licence Holder, must be copied and kept for 5 years by the Licence Holder.	
	Landlords are usually not experienced in managing antisocial behaviour and do not have the professional capacity to resolve tenant's' mental health issues or substance dependency. Suppose there are allegations about a tenant causing problems, and a landlord ends the tenancy. In that case, the landlord will have dispatched their obligations under the selective		

Theme	Example Comment/Question	Licence condition	Council response
	<p>licensing scheme, even if the tenant suffers from any of the above issues.</p> <p>At the commencement of a tenancy, the landlord outlines the tenant's obligations concerning noise (and other matters such as waste disposal, compliance with relevant legislation, and consideration for surrounding neighbours). The landlord can manage a tenant only to the extent of their mutually signed and agreed contract for living in the property- not for a tenant's activities beyond this.</p> <p>Lewisham Council has many existing enforcing powers that can rectify the identified problems as part of the council's housing strategy. These include:</p> <ul style="list-style-type: none"> • Criminal Behaviour Orders • Crime Prevention Injunctions • Interim Management Orders • Empty Dwelling Management Orders • Improvement Notices (for homes that do not meet the Decent Homes Standard) • Litter Abatement Notices (Section 92 of the Environmental Protection Act 1990) • Fixed Penalty Notices or Confiscation of equipment (Sections 8 and 10 of the Noise Act 1996) • Directions regarding the disposal of waste (for example, Section 46 of the Environmental Protection Act 1990) • Notices to remove rubbish from land (Section 2-3 of the Prevention of Damage by Pests Act 1949) 	<p>D) The Licence Holder shall co-operate with the Police and Authority in resolving ASB in any licensed property under their control. Such co-operation includes attending or being represented at any case conferences or multiagency meetings and providing information to the Police or the Authority when requested.</p> <p>e) Any correspondence, letters and records referred to in conditions (a) to (e) must be provided by the Licence Holder to the Authority within 28 days on demand.</p>	<ul style="list-style-type: none"> •Verbal abuse, harassment, intimidation or threatening behaviour •Vandalism and damage to properties •Prostitution, sexual acts or kerb crawling •Criminal behaviour (e.g. Use of the accommodation for unlawful purposes, such as selling or using drugs) •Misuse of communal areas, public areas (e.g. unsightly rubbish, litter or discarded items left around the property and its exterior) or loitering •Noise Nuisance (e.g. Hosting noisy parties, having music or television turned up very loud or otherwise causing a noise disturbance) <p>If a landlord / licence holder / other party are aware of ASB, the ASB policy also outlines how to report ASB to the council and the steps that will be taken to address it.</p>
ASB reassess	<p>There needs to be a mechanism for those affected by the antisocial behaviour to also have action taken.</p> <p>ASB should include reference to noise nuisance and fly-tipping.</p>		

Theme	Example Comment/Question	Licence condition	Council response
	<p>You are defining ASB as fly tipping and not including more serious ASB which is more important but extremely difficult for single landlords to tackle alone</p> <p>I'm concerned the focus on anti-social behaviour will be used to deny people access to good, safe housing. It's not clear how you intend to prevent this.</p> <p>The ASB policy must include a provision for removal of the tenant if the tenant does not comply with the ASB policy. A fine for the landlord if they do not comply with all conditions.</p>		
Fit and Proper test unclear	<p>What does fit and proper person test mean? This seems another unnecessary and intrusive measure, particularly if the landlord does not live in the property. Even if he or she does, are you going to require everyone who advertises for a house sharer to also do a fit and proper person test?</p> <p>I have heard that one possibility is that landlord's personal details will be published online. There are people who don't want their personal data published e.g., women fleeing violence. In addition, there is more and more online harassment. If you do publish this would be a particularly unnecessary and egregious step.</p> <p>Pass a proper person test should not be included or reworded and thought through</p> <p>What does 'Pass a fit and proper person test' mean? What does that entail? It sounds very politically wrong in my opinion and insulting to me that Lewisham council is proposing to give landlords tests to prove they're fit and proper. What kind of miracle test would prove that?</p> <p>Fit and proper person test - this is incredibly non descriptive and not required by government. It is open to council interpretation and potential mis use.</p> <p>I'm concerned about the fit and proper person test. Are the conditions fair for anyone regardless of age, race, gender?</p>	<p>13.Any licence holder must be a "fit and proper" person. This means he/she must not have:</p> <ul style="list-style-type: none"> a. convictions for serious violent, sexual, dishonesty or drugs offences, b. findings made against him/her that he has practiced unlawful discrimination against any person or persons who have protected characteristics, or, c. has convictions or findings of fact that he has contravened housing or landlord and tenant law 	<p>The council have used the definition provided by the legislation to define a "fit and proper" person</p> <p>The Housing Act 2004 (Part 3, Section 89) outlines what a "fit and proper" person. For clarity, the wording from the housing act (available here) is shown below:</p> <p>"(a)committed any offence involving fraud or other dishonesty, or violence or drugs, or any offence listed in Schedule 3 to the Sexual Offences Act 2003 (c. 42) (offences attracting notification requirements).</p> <p>(b)practised unlawful discrimination on grounds of sex, colour, race, ethnic or national origins or disability in, or in connection with, the carrying on of any business; or</p> <p>(c) contravened any provision of the law relating</p>

Theme	Example Comment/Question	Licence condition	Council response
Fit and proper removed	What is the purpose of the fit person test? That should be removed.		to housing or of landlord and tenant law.”
	Remove the ‘pass a fit and proper person test’. It is ridiculous nonsense.		It is a legal requirement of the Housing Act 2004 (Part 3, Section 88) that the local authority determine if the proposed licence holder is a “fit and proper” person when issuing a selective licence.
	<p>I agree with the conditions for landlords (carrying out repair work, etc) however fit and proper persons tests are notoriously difficult to implement and require a lot of resource to be effective. They would be particularly challenging at the scale you are proposing and would be highly susceptible to gaming (e.g., relying on references for landlords). I just don't believe this would be successful here. Again, I don't think the cost benefit case stacks up.</p> <p>I do strongly support the requirements for maximum occupancy levels and for minimum environmental standard of E, though it's not clear to me why this should just be concentrated in parts of the borough. Surely this should be a full blanket measure, if pursued at all.</p>		
Conditions for the exterior of the property	Front garden maintenance and bin stores	22. The licence holder must ensure that any common parts, gardens and yards are free from waste, which could provide harbourage for pests and/or is a nuisance and/or is detrimental to the local amenities, other than waste stored in appropriate receptacles for the storage of household refuse and recycling.	The exterior of the property is addressed in the condition relating to pest control, that they must be kept free from waste. Following the legal decision in the Brown v Hyndburn Borough Council, the council cannot impose conditions that are directed to the condition of the property, aside from those that are mandatory conditions as part of Schedule 4 of the Housing Act 2004 or directly relate to
	They must make sure the front garden and front of house is maintained, cleared of rubbish and made to look tidy.		
	The on-street appearance of the property has not been considered at all. It should be - for the collective wellbeing of everyone		

Theme	Example Comment/Question	Licence condition	Council response
			addressing the statutory intention of selective licensing (in this case, deprivation, poor housing conditions and ASB)
Repairs	Just know if you want good standard of living the repairs are key that's mould damp and any other repairs	<p>10. The Licence Holder must ensure that occupants receive written notice about how they should deal with repair and maintenance issues and with emergencies, should they arise. This notice must include a contact telephone number and email address to enable tenants to report urgent issues. Copies of the written statement of terms must be provided to the Authority within 28 days upon demand.</p> <p>21. The licence holder must ensure that all repairs are carried out in a timely manner and records of repairs need to be maintained. These records must be provided to the local housing authority within 28 days of any request.</p> <p>Additional licence conditions for Designations 1 and 2: All repair work must be carried out within a reasonable timescale with due regard to the severity of the issue. The Licence holder must ensure that any repairs, improvement works, or treatments are carried out by competent person(s). Copies of receipts and/or invoices for any such works must be provided to the Authority within 28 days upon demand.</p>	Issues relating to damp, mould and repairs are covered by the Homes (Fitness for Human Habitation) Act 2018. More information on this and the landlords' responsibilities can be found on the government website here
	I think that all rented properties should meet certain standards of repair and decoration before they are even rented out. What about fining landlords who don't comply with the standards?		
	<ul style="list-style-type: none"> - hired competent person(s) to carry out any repairs, improvement works or treatments - very subjective, should be removed - copies of receipts and/or invoices for any such works must be provided to the council within 28 days upon request - why? feels like too much interference in the property management, should be removed 		
	The type of repairs should either be clearly defined and adhere to existing laws or removed. Some complaints e.g., condensation or blockages to loo or drains are caused by tenants' lifestyle and disputes can arise about whose responsibility it is to carry out the repairs. If tenants decide to maliciously, deliberately and repeatedly damage the property and also not pay rent (which does happen unfortunately especially in deprived areas), it could take a long time and added stress and legal cost having to deal with the court as well as the licensing department of the council.		
	The Council should consider asking tenants whether the repairs which have taken place were necessary or not and also asked them if the extra money charged (such as fees for hiring a housekeeper) was used appropriately and if the work is regularly done		
Providing proof of receipt should be removed	"Provide receipts" honestly, that's a step too far, any work should be done to decent standard, and it may not be possible to complete some work in 28 days, how will you decide what's acceptable and what isn't.	Additional licence conditions for Designations 1 and 2:	The council is asking for asking for invoices and receipts in designations 1 and 2 to address poor

Theme	Example Comment/Question	Licence condition	Council response
	<p>- copies of receipts and/or invoices for any such works must be provided to the council within 28 days upon request - why? feels like too much interference in the property management, should be removed</p> <p>Providing receipts - most landlords get family to do things. This will just prevent landlords doing any repairs and blame tenants for wear and tear so tenants will get charged. Provide repair work within a reasonable timescale - this does not mean anything.</p> <p>Why should landlords have to show invoices for repairs. Could you let me know how you are going to safeguard landlords please?</p>	The Licence holder must ensure that any repairs, improvement works, or treatments are carried out by competent person(s). Copies of receipts and/or invoices for any such works must be provided to the Authority within 28 days upon demand.	property conditions. A receipt or an invoice should be provided so that where there is a dispute about the quality of repairs there is a means of identifying the person or company responsible and to checking whether the repairs were carried out by a competent person(s)
Reference can be a barrier for housing vulnerable people	<p>I'm not sure about taking up references - many people might find this difficult and if it hinders people from finding secure housing then I would not insist. Issuing an ASB policy and getting a signature would suffice.</p> <p>Remove requirement for references to tackle anti-social behaviour - serious risk of excluding vulnerable individuals who aren't able to secure a reference for another reason</p> <p>I think the council should think carefully about the potential impact of excluding those with poor references from licensed rental accommodation. You will end up creating violent unlicensed slums. Council should instead offer support/guidance to those with anti-social behaviours</p> <p>Concern that it may be difficult for people in some situations (e.g., vulnerable) to get the references needed and this might exclude them from the rental properties. Requirements would need to be flexible and make adjustments for different circumstances.</p> <p>I think that references can be a barrier to housing for vulnerable people. I am strongly in favour of landlords having a requirement to fix poor housing conditions but by lumping them together in one question you are muddling the issue.</p>	<p>The Licence Holder must ensure that references are demanded from and in respect of all persons who wish to occupy the house. If the licence holder chooses to allow an individual who cannot provide references to occupy the property, they must record their reasons for doing so. These reasons must be provided to the council within 28 days of any request</p> <p>Copies of obtained references are retained for the duration of the licence and that the Authority is provided with a copy of any such references and records within 28 days, on demand. These conditions apply to any agreement made on or after the licence is granted</p>	<p>Schedule 4 of the Housing Act 2004 sets out the mandatory conditions to be applied to property licences, including for selective licences that the licence holder must demand and obtain references from persons who wish to occupy the house. Guidance on reference checks is available in the governments 'How to Let' guide.</p> <p>Enforcement action is considered on a case-by-case basis and factors impacting on the ability to obtain references will be taken into consideration</p>
Reasonable timescale clarity	'Reasonable timescale' - specify a timescale instead. What's reasonable to a landlord may not be reasonable to the tenants living with the issue.		The council accepts that this condition is not specific. However, strict time limits on

Theme	Example Comment/Question	Licence condition	Council response
	<p>"Reasonable timescale" should be defined as no more than 30 days.</p> <p>There needs to be clearer instructions and timescales</p> <p>What is a 'reasonable timescale' for repairs? Too vague and subjective, needs to be more specific. But of course, the Council itself and housing association need to improve their performance in this area as well!</p> <p>Conditions are too woolly. what exactly is a "reasonable timescale" for example?</p>	<p>21. The licence holder must ensure that all repairs are carried out in a timely manner and records of repairs need to be maintained.</p> <p>24. If the license holder becomes aware of any pest infestation, steps must be taken to eradicate all pests in a timely manner.</p> <p>Additional licence conditions for Designations 1 and 2: All repair work must be carried out within a reasonable timescale with due regard to the severity of the issue.</p>	<p>repairs in a licence condition are not practical because:</p> <p>a) The council understands that a wide range of works fall under the phrasing of "repair" – ranging from serious structural works to minor repairs to devices, and therefore the timescale which is reasonable for a structural repair is different to a reasonable timescale for a small repair</p> <p>b) Reasonable allows flexibility where, for example, scarcity of particular materials can affect the time required to carry out a repair.</p> <p>However, the council will monitor repairs time frames on a case-by-case basis and follow up with repeat inspections and further action if necessary to ensure repairs are carried out.</p>
Waste Management	<p>Rubbish management needs to be explicitly called out. Tenants failing to recycle properly and/or leaving bins across pavements needs to be dealt with. Fine landlords and tenants for irresponsible rubbish management.</p> <p>Use of front gardens for rubbish dumping for long periods should not be allowed. Leaving rubbish out for a week or two while awaiting removal is OK, I am talking about rubbish left for years with no intention of getting it removed.</p> <p>Make landlord responsible for rubbish and fly tipping</p> <p>Proper disposal of refuse and keeping the front of the property tidy</p>	<p>18.The licence holder must ensure that all occupants comply with all schemes provided by the local housing authority which relates to the storage and disposal of household waste pending collection.</p> <p>19.The Licence Holder must ensure that new occupiers are given the following information on waste and recycling in writing within 7 days of taking up occupation:</p>	<p>The council believes that the waste management conditions are sufficient to address these points.</p>

Theme	Example Comment/Question	Licence condition	Council response
	<p>Often when tenants are nearing the end of their contract/tenancy and are moving out, they will dispose of excess household waste by a variety of methods. These include but are not limited to putting waste out on the street for the council to collect. This is in the hope of getting their deposit back and is made worse when the council does not allow landlords access to municipal waste collection points. Local authorities with many private rented properties need to consider a strategy for collecting excess waste at the end of a tenancy in place of selective licensing.</p> <p>Suppose such a scheme is not already in place. Would the council consider a free/low-cost service for private landlords to remove numerous bunk items for when tenants vacate the property and not dispose of such waste beforehand?</p>	<p>a) The collection days for the refuse and recycling bins for the house - https://lewisham.gov.uk/myservices/wasterecycle/your-bins/collection</p> <p>b) Details on assistance available, where the occupants require assistance – https://lewisham.gov.uk/myservices/wasterecycle/your-bins/assisted-collection-service</p> <p>c) Details on what they can and can't recycle - https://lewisham.gov.uk/myservices/wasterecycle/recycling</p> <p>d) How they can dispose of large items- https://lewisham.gov.uk/myservices/wasterecycle/dispose-of</p> <p>e) General waste guidance from the Lewisham's website: https://lewisham.gov.uk/myservices/wasterecycle</p> <p>20. The licence holder must keep themselves informed of any changes or additions to the above and update all occupiers in writing within 7 days of becoming aware of any such change or addition. The licence holder will be treated as being aware of changes or additions 10 working days following the publication of any such scheme on the Council's website. A copy of the information provided to the occupiers must be kept for 5 years and provided to the local authority within 28 days on demand.</p>	<p>The council has an existing large items collection service. More information is available on the council website here</p>
Certification	<p>Fire Safety Certificates? Electric testing every 5 years</p>	<p>2. All portable electrical appliances provided by the landlord must be maintained in a safe condition and proper working order. Portable Appliance Testing (PAT) should be carried out every twelve months with records kept for at least five years. Any necessary maintenance or repair work must be undertaken by a competent electrical engineer. Copies of all maintenance records and PAT testing may be provided to the Council within 14 days of request.</p> <p>3. All furniture and furnishings provided in the house must be kept in a safe condition and must comply with the current furniture and furnishings</p>	<p>The council believes that annual PAT testing is a reasonable condition</p> <p>The council cannot require landlords to provide fire safety certificates. However, more information on the landlord's responsibilities and good practice can be found on the London Fire Brigade website here</p>

Theme	Example Comment/Question	Licence condition	Council response
		fire safety regulations. A declaration of furniture safety must be provided to the Council on request.	

Comments about Licence Conditions in General

Theme	Example Comment	Council response
Conditions already exist through legislation	I believe that all the above are already covered by legislation and can see no good reason to further licence properties other than HMOs within the borough. All good Landlords will comply, but it those who renting illegally or without the necessary documentation that need to be rooted out and made to comply with already existing tenancy laws.	The council have considered a range of alternatives to selective and additional licensing, but do not believe they are as effective in dealing with poor property conditions, deprivations and ASB in the borough. The current powers the council has, including the use of the Part 1 Housing Act 2004, do not require landlords to declare themselves. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months.
	As far as I'm aware, almost all the conditions are already in force via existing legislation so licencing will not introduce anything new of significance	
	The landlords are already required by law to make the homes safe. These conditions are not fit for the intended purpose. The council should approach the problem from an enforcement perspective. No landlord knowingly rents to a person who commits ASB, it would not be in their own interest.	
	All should be removed as there are already national legal requirements for landlords that set out what they can and cannot do.	
	I believe that all the above are already covered by legislation and can see no good reason to further licence properties other than HMOs within the borough. All good Landlords will comply, but it those who renting illegally or without the necessary documentation that need to be rooted out and made to comply with already existing tenancy laws.	
Already happening	What you are proposing in the standard housing conditions or most of it is already required from a landlord by the law. So as a landlord I have to meet these requirements whether I have a licence or don't have it. The only difference for me would be yet another cost that I need to pay to comply with yet another requirement.	Whilst the Council acknowledges that many landlords operating in the borough keep their properties to a high standard, the evidence presented during the consultation shows that there are large scale issues with poor property conditions, and ASB in the borough's private rented sector, that licensing can help to address. The council believes that many landlords will meet the licence conditions, and do keep their properties in good condition, but licensing enables the council to take action against those landlords who place their tenants in unsafe or overcrowded properties.
	There is no need to introduce a new licence to implement ASB reduction procedures. There are already ASB procedures in place at the moment that are implementable with the current legislation.	
	All should be removed as there are already national legal requirements for landlords that set out what they can and cannot do.	
	Why should a landlord have to show the council information that is already required by law? A lot if these conditions should be applied to those landlords that have tenants whose rent is primarily met by the Govt.	

Theme	Example Comment	Council response
	<p>Why are you seeking in part to just replicate existing law? Just enforce the existing law properly.</p> <p>All the issues you raise are already statutory, you propose wasting landlords' and council officers' time with repetition.</p>	
Social/council properties should be included	<p>ASB issues appear to be outside the control of landlords, including the Council. H&S issues related to national regulations are dictated in contractual templates and enforced by letting agents. This is just Lewisham Council trying to pretend the issues it is referring to relate to the private sector, when in reality the Council fails to meet its own standards (mould, ASB, pest control, overcrowding etc)</p> <p>Will Lewisham Council apply the same standards to its properties?</p> <p>These conditions should be imposed on Lewisham Council</p>	While the Council acknowledges that all property types may have issues with property conditions and ASB, licensing is a tool available for the Council to use to address these issues in the PRS.
Good landlords will already meet conditions	<p>All good landlords already have checks carried out on potential tenants, having references carried out on potential tenants from their employers, previous landlords, credit checks</p> <p>I have no problem in providing anything you need as part of a licence - and I am not sure how I can comment on the state of private rented accommodation and associated problems. As a responsible landlord I would obviously comply but having to pay for the privilege is pushing me to think that just isn't worthwhile.</p> <p>Already have to do most of this. And where do the responsibilities of the freeholder (Lewisham Homes) fit it?</p> <p>All good landlords will have the relevant legal safety checks in place and will have a tenancy agreement in place. Perhaps this is something that should be properly legislated and policed in the country as a whole, not just in a particular area.</p> <p>All good Landlords have to comply with GS, Electrical and EPC etc. Notice cannot be serviced unless a landlord complies with legislation therefore the above is totally pointless. Who knows what a fit and proper person or Landlord is, this is just all a jobsworth for nothing?</p> <p>These things are done anyway by responsible landlords by law, so can be checked under existing legislation. I understand that new rules will involve charging landlords for things they have already paid out for.</p>	<p>The council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the areas in the proposed designation are experiencing persistent issues in the private rented sector with poor property conditions and management.</p> <p>The council is proposing to use the regulatory framework provided by selective licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. The council will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords.</p>
Burden on Landlord	<p>This is just additional admin burden for landlords and council. I don't want the council having to administer this with my council tax. Just tax owners of properties that are not primary residences instead</p> <p>All this very much puts the onus on the landlord to do everything, yet we know that the Council is very tardy in making any necessary repairs to the extent that one can easily give up! What about the Council's responsibility to undertake</p>	Properties where the property is the landlords' main residence, are exempt from selective licensing under the Selective Licensing of Houses (Specified Exemptions) (England) Order 2006.

Theme	Example Comment	Council response
	<p>repairs and deal with anti-social behaviour? Will you support landlords rather than just making them pay and fill in paperwork and take all the hassle on themselves?</p> <p>All of these represent a much higher standard than is met by many private owners in their own homes. They are not met by Lewisham council tenants.</p>	<p>Selective licensing aims to improve the quality of housing available in the private rented sector. Owner occupiers and council homes cannot be covered by selective licensing.</p> <p>Licensing is intended to be self-funding, so revenue from council tax will not be used to administer the scheme.</p>
Housing Conditions	<p>With reference to Poor Housing Conditions, I feel that tenants have the right to live in acceptable surroundings which would impact positively on their mental health. The conditions stated only require landlords to do the minimum for their tenants and its totally obvious that's what they do when you look at the rented properties in Evelyn- areas that look totally run-down and approaching slum-like unless something is done asap.</p> <p>Poor housing conditions - rooms with no window and specific number of m2 per person must not be counted as room for renting.</p> <p>ASB is in my view a minor issue compared to poor housing conditions on which the selective licencing scheme should focus</p>	<p>Licence conditions are issued to each specific licenced property. This condition, specifying the room size and maximum occupancy, will depend on how the property is laid out and the facilities available in the property, which are noted during the inspection. The condition is then completed for that specific property</p>
Housing Standards	<p>Building maintenance required to decent standard to ensure tenants are in adequate homes</p> <p>Fire safety standards/rules as some balconies are unable to be used by tenants in case of fires to escape due to too many items on balconies</p> <p>Access to the garden if there is one</p> <p>Provision of living room and maximum numbers of people sharing a kitchen or bathroom</p> <p>Provision of central heating</p> <p>Some of the conditions around housing standards need to be mandated rather than only provided on request. Needs to include requirement for landlords to take remedial actions to remove damp and improve insulation.</p>	<p>As stated above, following the legal decision in the Brown v Hyndburn Borough Council, the council cannot impose conditions that are directed to the condition and contents of the property, aside from those that are mandatory conditions as part of Schedule 4 of the Housing Act 2004 or directly relate to addressing the statutory intention of selective licensing (in this case, deprivation, poor housing conditions and ASB)</p>
Opposed to conditions	<p>Remove all of them</p> <p>In my view - all of the proposed conditions should be removed.</p> <p>All should be removed to avoid gentrification and discrimination</p> <p>Remove all of them. It is busy work for busy bodies. Focus on reducing taxes or improving existing services. Stop inventing new jobs for yourselves.</p> <p>I think all conditions are unjustified and should be removed and no extra burden should be placed on landlord. Tenants have plenty of protection and support</p>	<p>The council is required to apply the mandatory conditions (from Schedule 4 of the Housing Act 2004) when implementing selective licensing.</p>

Theme	Example Comment	Council response
	already and landlords are an easy target who are once again used as a political punch bag.	
Rent cap	I think something needs to happen about rental prices. Some form of guidance or cap on realistically what can be charged or at least a ban on creating or requesting bidding on rental cost.	The council does not have the authority to impose rent caps on private properties in the borough
	It should be ensured that landlords will not raise rent prices.	
	The ability to register a fair rent needs to be widened and a private rented sector rent cap needs to be introduced in line with the LHA. Landlords' ability to increase rent when they like by whatever they like and threatening section 21 eviction if you disagree is unacceptable.	
	I suspect that the council is unable to do so. But I would like to see rent controls included. At a minimum landlords should not be able to increase rents for existing tenants above the rate of inflation and should not be able to evict to get a higher paying tenant.	
	Is it possible to include something about charging a fair rent? We see people that are paying £1000/month for a room - they then have access to shared kitchen and bathroom facilities. These are often not secure e.g., food taken from kitchen.	
Waste of resource and time	Unless registration is completely free this will not work. Chasing no compliance will cost even more on admin ... yet another waste of council taxpayers money ... when we are all struggling to pay current council tax, rents mortgages food etc	The council believes that selective licensing is required to meet the objectives of Lewisham's corporate strategy and would not bring about the much-needed improvement in conditions for people living in the private rented sector.
	These are a waste of time. Decent landlords are already doing this, and your proposal will now just charge them an additional licence fee in order to prove to the council that they are doing this. This is a complete waste of time (council and landlord) and money (landlord). Those that aren't doing these things will continue not to do them or use made up documents.	
	You are giving yourselves a massive amount of paperwork/data to work through. Can you cope?	
	I don't agree with the whole licensing scheme as I have not seen any benefit other than another layer of costs and paperwork for councils when better time and money can be used elsewhere. We are already short of resources and there is a cost-of-living crisis and the council is putting through more paperwork and processes because of anti-landlord sentiments, when there are only a minority of rogue landlords.	
Inspection	Physical inspections of properties should be included and made clear to residents and landlords, not just penalties	The council will carry out inspections on properties during the life of the scheme, and if properties are found not to be compliant, the licence holder could be served with an improvement or prohibition order, or could have their licence revoked
	Regular inspections of the property should be made compulsory, every 6-12 months to ensure conditions are being met.	
	An inspection system. Ensuring compliance with regulations does not guarantee there is no damp or mildew, that windows fit or that pipework doesn't leak.	

Theme	Example Comment	Council response
	<p>Checks need to be carried out at properties to ensure Landlords are compliant and tenants should have a direct line to the council which landlords should legally be enforced to provide to tenants in case they are in breach and can be reported.</p> <p>Include conditions on the tenants to ensure that they look after the property as if it were their own, and that tenants respect their neighbour</p>	
<p>Permissions to convert into HMOs</p>	<p>I think anyone who wishes to convert a property in HMO needs to get planning permission in the first instance. Rogue landlords will find a loophole whereas when they are purchasing properties there is no guarantee that it will be granted. And applications should not be submitted until contracts have been signed</p> <p>Inability to turn small houses into HMOs for 8 persons</p>	<p>Selective licensing applies to properties let to single households and one or two sharers, not to HMOs. Selective licensing conditions cannot address planning permission for HMOs. HMOs in the borough are subject to additional and mandatory licensing. More information on HMOs can be found on the council website here.</p> <p>The council introduced additional licensing in April of this year (2022) which covers small HMOs which were not covered by the national mandatory licensing scheme. The licence conditions for HMOs can be found on the council website here are they address minimum space requirements and health and safety. In addition, in June 2022 Lewisham Council's Housing Scrutiny Committee agreed to recommend the extension of the existing Article 4 Direction to the remainder of the borough not currently covered. This means that permitted development rights for the change of use from a dwelling house to a small HMO will be withdrawn, and those wishing to undertake such conversions will need to apply for planning permission</p>
<p>Early bird or accreditation discounts</p>	<p>Offer landlord grants to help towards tackling disrepair and offer early bird discounts and discounts for landlords who are accredited or members of a professional body.</p> <p>Wave the fees for the first 100,000 applications</p>	<p>The council is proposing an early bird discount for application made before the scheme goes live, and a discount for accredited landlords (someone who has completed a training course in best practice run by a recognised organisation such as the National Residential Landlords Association.)</p>
<p>Support for landlords</p>	<p>The Council should support good landlords when a tenant wrecks their property after it was given to the tenant in top quality condition.</p> <p>The Council should support good landlords when a tenant wrecks their property after it was given to the tenant in top quality condition.</p>	<p>If the licensing scheme is introduced, the council proposes to increase the landlord forums and support events, with help and guidance for dealing</p>

Theme	Example Comment	Council response
Eviction of problem tenants	Evictions of problem tenants	with anti-social behaviour as part of the programme.
	Ability to enforce removal of antisocial tenants quickly if they breach rental conditions and removal of landlord licence if the landlord ignores complaints about tenants	
EPC	Energy efficiency of properties should be included so all properties are EPC rating C or above. Also ensure that the H&S check includes damp and mould checks. I also think you need to include some kind of checks to ensure these fees don't end up being put on renters via increased rent,	Following the legal decision in the Brown v Hyndburn Borough Council, the council cannot impose conditions that are new standards on properties, aside from those that are mandatory conditions as part of Schedule 4 of the Housing Act 2004 or directly relate to addressing the statutory intention of selective licensing (in this case, deprivation, poor housing conditions and ASB).
Address damp	The stated conditions are NOT robust enough or measurable. Needs to include structure i.e., suitable air flow to prevent damp and noise insulation. The landlords know how to evade, the regulations must be prescriptive. Where landlords target the more vulnerable groups, they must demonstrate sign posting support as a minimum for drugs and alcohol. They must liaise with the directly impacted neighbours. They must leave an email and contact number.	Conditions relating to dampness and security are covered by Part 1 Housing Act 2004. If selective licensing is approved, the council would be able to pro-actively inspect properties to ensure compliance with the licence conditions and Part 1 Housing Act.
	There is nothing on dampness, physical security of the property.	
Other	A contact to report neglected damp, mould, water leaks. Adequate heating and ventilation.	Any concerns about unlicensed properties, or other issues relating to privately rented homes should be reported to pshe@lewisham.gov.uk and an officer will be assigned to investigate. The council is currently reviewing its external communications tools for licensing, meaning this email address may be subject to change. Please visit the council website for up-to-date information.
	Repeat offending landlords should have their licences suspended in the offending area for a set period	If selective licensing is implemented, tenants will be able to report their property if it does not meet the licence conditions to the property licensing team, who will be able to inspect the properties Licence holders who do not abide by the licence conditions can have their licence revoked. Rogue and persistently irresponsible landlords will be subject to civil penalties and fines incurred following a successful prosecution. The "fit and

Theme	Example Comment	Council response
		proper” person test also considers if someone has “contravened any provision of the law relating to housing or of landlord and tenant law”, and therefore further licences may not be given.
	I think PAT testing should only be required on appliances that have been left by the landlord. The tenant is responsible for their own electrical appliances.	PAT testing is only required on electrical appliances provided by the landlord
	Included should be grants to pay for improvements or or interest free loans	The Council does offer grants to bring properties up to a decent standard. More information on grants available to landlords can be found on the council website here
	Publicly accessible register available online	The council will be introducing a register of licensed properties for selective licensing
	Soundproofing	Following the legal decision in the Brown v Hyndburn Borough Council, the council cannot impose conditions that are new standards on properties, aside from those that are mandatory conditions as part of Schedule 4 of the Housing Act 2004 or directly relate to addressing the statutory intention of selective licensing (in this case, deprivation, poor housing conditions and ASB).

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Comments about the Licensing Fee and Discount

Theme	Example Comment	Council Response
Accreditation	<p>Any accredited landlord would know exactly the right procedure in renting a property. Less help is required therefore the fee should be lower than the suggested.</p> <p>Early bird price gives no consideration for accredited landlords. I.e., no additional discount. Accredited landlords show they been educated on letting property and should be the cheapest. There should be a discount for more than one property</p> <p>I think accreditation should be encouraged. Furthermore, the frequency of the fee has not been clarified. Annually? 5 years, in line with accreditation?</p> <p>Why should a charity be heavily discounted, but an accredited landlord not have the same level? These landlords who have provided good, clean safe homes should be recognised and should see discounts that show they are doing right by their tenants and the local community. The only way to provide competitive homes and making landlords care about property and their clients is to be incentivised - tax breaks, discounts and rewards.</p>	<p>As stated above, the council wants to acknowledge the good practice of landlords who are accredited, and if the scheme is approved, accredited landlords would receive a discount to their licence fee. However, accreditation, while an indication of good intentions, is not a guarantee that the landlord is fully aware of their obligations or that the properties they manage will necessarily be up to standard without greater involvement from the Council.</p>
Charities	<p>I tend to think charities shouldn't be charged a fee.</p> <p>Support an increase to the regular landlord cost in order to provide a further discount/exemption for charities and local housing associations. Or where private landlords pass their property management to a housing association.</p> <p>Eligible charities discount should be greater at the expense of other discounts.</p> <p>Only charities should receive a discount. The license should be subject to annual review & the fee paid annually.</p> <p>Fees for Charity housing should be very low, and the private market take up the extra. Profits from private rentals are high so landlords can probably stand to pay more.</p>	<p>There is a discount for eligible charities of £160. 'Eligible charity' means Corporations, organisations or bodies which are charities, including almshouses, whose charitable objectives include the provision of housing (a) let at below-market rent and (b) that is specially designed or adapted to meet the needs of the disabled, the elderly or the infirm or of other persons having a protected characteristic within the meaning of the Equality Act 2010.</p> <p>Selective licensing only applies to privately rented housing. The council has reviewed possible discounts and is satisfied that the correct ones are proposed. However, we will keep this under review.</p>

Theme	Example Comment	Council Response
Early Bird Discount should be removed	<p>Early bird application should be removed. Landlords should not need financial encouragement to get it, they should be required to have it.</p> <p>I would be inclined to remove the early bird application fee</p> <p>early bird should probably be removed. probably just one standard fee better.</p> <p>I am not sure why early bird applications are being encouraged. If it is compulsory to register with the scheme this should not be problematic.</p>	<p>The council wants to reward responsible landlords who apply promptly for a licence by offering them a discount. Incentivising early applications also helps the council to manage the considerable administrative work of assessing applications at the start of a scheme.</p>
Good practice should be exempt from fees	<p>I think for landlords that do look after their property to a good standard could possibly have a further discount after 1 or 2 years. If this is not maintained, then they should go back to the higher rate.</p> <p>If this does go ahead why not give a 100% refund to compliant landlords. Is this another way to generate a revenue stream? It punishes what I believe to be the majority of good landlords for the minority of bad ones.</p> <p>Discounts for consistently good feedback from tenants, which would require the council to survey tenants in licenced landlords' properties.</p> <p>Good landlord behaviour discounts - no complaints from tenants, etc in set number of years</p> <p>Maybe a discount for those landlords whose houses are already up to a very good standard. Like after the inspection and checks they can get a discount because they were already doing the right thing.</p>	<p>As stated above, the council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that the areas in the proposed designation are experiencing persistent issues in the private rented sector with poor property conditions and management.</p> <p>The council proposes to use the regulatory framework provided by selective licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. The council will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords.</p>
Higher fees	<p>Many HMO developers portray themselves as charities, housing vulnerable residents, however these are often in properties without adequate access to public transport or other public services. It does not seem like adequate assessment of landlords is being carried out. Licensing fees need to be raised and discounts minimised.</p> <p>No, fee should be higher if anything</p> <p>Fees should be higher, and annual, landlords are making money out of poorer people who cannot afford to buy, extra money should go towards benefit of all people in the Borough</p> <p>It's too cheap. I paid £750 in Bexley</p>	<p>Under the law, the Council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications the Council anticipate, under the proposed designations.</p> <p>However, the council will monitor costs throughout the lifetime of the scheme, and as and when schemes are due for renewal, these will be reviewed.</p>

Theme	Example Comment	Council Response
No discount should be applied	<p>For some landlords the fees will be very high (small, single property etc) and may encourage illegal off-books arrangements. Increases in fees must be capped at below inflation.</p> <p>No discounts should be considered at all</p> <p>I strongly disagree with the proposed discounts, and I do not want any proposed fees and/or discounts implemented.</p> <p>I think all landlords should pay the full fee, with no exception, unless perhaps they can demonstrate that they are charging tenants at or below market averages.</p> <p>Why should big corporations be allowed to develop so many HMOs. We need housing for families not bedsits. They should not have any discounts they are not providing any homes just problems for what was a decent area and turning it into an even more deprived area.</p> <p>No discounts should be given as such fees are easily covered by rental income receivable.</p>	<p>The council has reviewed possible discounts and is satisfied that the correct ones are proposed. However, we will keep this under review.</p> <p>The council wants to reward responsible landlords who apply promptly for a licence, and those who are voluntarily accredited, by offering them a discount.</p>
No fees	<p>Disagree with fees totally</p> <p>No fee should be allowed. Only fines for those who do not look after tenants and properties</p> <p>It should all be free, we already pay extortionate amounts of tax for renting the property, mortgage and repair subsidies have been reduced ... this just makes it even less money to use and update the rental property .</p> <p>I do not think landlords should have to pay for these kinds of measures to be out in. They already pay for these measures through agents etc. Perhaps a licensing arrangement with no fees would be more appropriate</p> <p>Remove the fee to begin with. Absolute joke for Lewisham Council to try and suck up more money from working people. Scandalous behaviour pretending it is for the tenant's sake. All you seek to do is increase Lewisham Council's bulging wallet.</p>	<p>The schemes are required to be self-funding therefore for the council to be able to implement and run the schemes and carry out inspections, there is a need for a fee.</p>
Portfolio landlords should not receive discount	<p>Portfolio landlords are already financially privileged and should not receive a discount</p> <p>An eligible portfolio landlord should have the highest cost and be subjected to the most stringent standards possible.</p> <p>There shouldn't be a discount for the 'eligible portfolio landlord' - there's no need to help landlords who have accumulated large</p>	<p>There is no discount for portfolio landlords. As with our current additional HMO licensing scheme, we will have a bulk application process to reduce the burden of applying for a license on those landlords with multiple licensable units. The fee per unit remains the same</p>

Theme	Example Comment	Council Response
	<p>portfolios and associated income to make even more savings/income. It just encourages large scale landlordism.</p> <p>Portfolio landlords don't need any reduction due to the scale of their business however smaller landlords ought to have more considerations. With the costs and efforts required from the landlords, the proposed scheme as is will only promote increased rental prices due to the increased effort and cost to landlords.</p> <p>Agree with most except for discounts offered to landlords of large groups of properties. I don't think there should be financial incentives for this kind of mass-landlord.</p>	
<p>Single property landlord discount</p>	<p>Much larger discount for people who own one property, especially the standard fee</p> <p>The discounts don't go far enough for landlords of single and small properties whose rents will be low. And the early bird discounts may work unfairly for big business owners of properties as against the individual owners.</p> <p>Landlords with one property, to which they can establish a personal connection of some standing, should not be treated the same as offshore companies with hundreds of properties and one managing agent who lives in Norwich.</p> <p>This process seems to skew against single or low digit property landlords. It's highly unlikely that an individual is going to be accredited and it's often those with larger portfolios that are the poorest landlords.</p> <p>Again, you are hitting the "small landlords". They probably care the most given they own just one or two extra properties.</p> <p>A one-off landlord isn't going to be trained but a big company probably cares less but will get a discount - why!?</p> <p>You don't need to be trained to be a landlord! You need to care about the property, tenants and neighbours.</p>	<p>The licence fee is set based on the cost of the schemes. The fee is not permitted to be set based on the number, size or rental value of the property</p>
<p>Too costly</p>	<p>Too expensive. Landlords are not earning any money. mortgages, taxes, continual repairs and maintenance, general costs. Yields are below 4%.</p> <p>These fees are way too high per property. This is probably needed but you need to be reasonable. Owning a property cost a lot too.</p> <p>It is a nominal amount and not enough to deter poor standards</p> <p>I recognise that care has been taken to set fees at cost basis rather than profit basis, but it creates yet another tier of</p>	<p>Under the law, the council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications we anticipate, under the proposed designations.</p>

Theme	Example Comment	Council Response
	<p>bureaucracy which will inevitably become more costly in its administration.,</p> <p>Far too costly and you should offer it to be paid with instalments</p>	
<p>Discounts for landlords who house tenants considered vulnerable</p>	<p>Discounts for income poor (for example retired person with a small pension) individual landlords whose main income is represented by rents.</p> <p>Landlords who let their properties to council tenants in need and refugees should get a discount to encourage people do to that</p> <p>I don't think there should be any discounts based on the profile of the applicant. If the applicant can prove that they are offering discounted rents to vulnerable groups – then perhaps they should be entitled to some discount.</p> <p>Should there be a bigger discount for a homeowner who lets part of their property? For example, an elderly or disabled person who needs someone around in case of emergencies, or simply to get by on benefits?</p> <p>Discount for landlords who guarantee acceptance of tenants with income from benefits - serious need to tackle 'no DSS' listings</p>	<p>Discounts for those letting to vulnerable tenants would cost significantly more to process and administer. Should the council use these discounts this would mean having to set a higher licence fee to cover the additional cost, which would pass the burden on to all landlords.</p> <p>Many landlords letting to low-income tenants already enjoy significant support from the council in the form of housing benefit, property management services and incentive payments. This is not related to the need to fund high quality enforcement of standards in the private rented sector, which is especially important for the most vulnerable renters, many of whom live in poor quality accommodation.</p>
<p>Fees should be linked to the number of properties / rents</p>	<p>The fee needs to take into account a landlord's profits. Some are making huge profits and should pay accordingly. For others like myself they have a rental property which is actually making a loss and so these fees will end up being passed on to tenants.</p> <p>Fees should be based upon a percentage of rents collected</p> <p>landlords who own more than one rental property are investors who reduce available housing stock and result in increased rental prices -- their licensing fees should be very high</p> <p>Discount for landlords with a single property - otherwise you are just incentivising large scale overseas landlords /large companies</p> <p>A much higher fee for those with multiple properties. These people are making a lot of money!</p> <p>Fee should take into consideration rental income. The higher the income the larger the fee.</p>	<p>As stated above, the licence fee is set based on the cost of the schemes. The fee is not permitted to be set based on the number, size or rental value of the property</p>
<p>Discount if using a letting / managing agency</p>	<p>Discount where properties are let through an agent should be the same as for accredited landlord. Not everyone has the time to a totally hands on landlord but instead use an agent to take care of the legality of renting</p>	<p>The council acknowledges that there are many good estate and managing agents who operate in the borough, however, not all provide a good service, or</p>

Theme	Example Comment	Council Response
	<p>Using a reputable management agency means this is completely unnecessary. Most of these issues you mention are common with Council-as-Landlord properties; not private.</p> <p>Discounts should be made if a property is rented using a managing agent</p>	<p>know what the regulations are with respect to privately rented properties.</p> <p>Real estate agents are not required to have Housing Health and Safety Rating System training, which the council is required to use to make a decision regarding the safety of a property.</p>
Unclear	<p>Is this an annual fee, or a one-off fee. It is not made clear.</p> <p>Who's paying for this licence. The landlord or me as a tenant???</p> <p>Still unsure if this is a one-off fee, Annual fee or every time the tenancy changes. Basically, comes down to being charged to run your property better but with no support for what issues you want to address- which makes it a money-making tick box exercise.</p> <p>Do the fees apply irrespective of property? I.E., different rates for apartment vs house or 1 bedroom vs 5 bedroom or leaseholder in council property vs freehold?</p>	<p>The licence fee is taken in two parts, part a on application, and part b when they licence is approved. Once paid, the licence lasts for up to 5 years. If a tenant changes, you will be able to update your licence with the new information free of charge. The licence holder, usually the landlord, should pay the fee. The fee is the same regardless of the property size, if it is a house or a flat/apartment, and if it is a freehold/leasehold of a council property, if it is rented out privately.</p>
Discretionary discounts	<p>Implement discretionary application for special cases - ex. Elderly owners with dependant of rents, families divorcing in low incomes...</p> <p>These costs should be for old properties build before 2015. Newer properties already comply with these requirements and offer high quality accommodation and this is just another burden for the landlord. Who might decide to sell and find another borough? The council should be encouraging the letting of newly built properties instead of adding fees.</p> <p>The rates should be means tested.</p>	<p>Discretionary or means tested discounts cost significantly more to process and administer. Should the council use these discounts this would mean having to set a higher licence fee to cover the additional cost, which would pass the burden on to all landlords.</p>
Information on how the fee will be used	<p>The fee does not link to the issues trying to be resolved. There is no fee breakdown to assess what the fee actually costs and how funds will be used.</p> <p>You need to provide a breakdown to state how the fee has been calculated</p>	<p>The fee has been set to make the scheme cost neutral, taking into account the cost of inspections, compliance checks, and the discounts available to landlords.</p> <p>The fee is to be paid in two parts:</p> <p>Part 1: Fee of £160 for processing and determination of the application payable on application for a licence.</p> <p>Part 2: Fee of £480 for administration, management and enforcement of the scheme payable before a licence is issued. The final licence will not be issued until the full fee has been paid.</p>

Theme	Example Comment	Council Response
Add annual or renewal fee	<p>Initial fees should be lower to support landlords who may find it hard to afford the fees and reduce rogue landlords who may decide not to apply at all. Then there should be a renewal fee (e.g., every 2 years) as once a landlord obtains a fee, bad practices could return after a while.</p> <p>Add an annual or some sort of renewal fee to maintain license.</p>	<p>Under the Housing Act, selective licences last for five years. If the scheme is approved, and then if in five years the council wishes to continue a selective licensing scheme, the council may choose to review the fee structure.</p>
The fees need to cover the staff to monitor the scheme	<p>Need to ensure funds generated can support a dedicated team to monitor, otherwise it will be misused, and no one will especially the deprived will be further exploited.</p> <p>Has it been taken into account how many extra team members Lewisham council will need to enforce the proposal and do these fees cover decent salaries for the new members of staff required?</p>	<p>As stated above, the proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications the Council anticipate, under the proposed designations</p>
Other	<p>Discounts for landlords letting to long term, stable private renters.</p> <p>Fees/fines for additional inspections and compliance checks if works not carried out in a timely manner and to a reasonable standard.</p> <p>There should be NO fee for the first round to get landlords on board. We owned property before this scheme was proposed. Landlords that have owned property for >12m should get a 'renewal' discount at each renewal</p> <p>How about resident landlords who live on the premises who in their interest in safety meet all the requirements, who in theory are live in caretakers.</p> <p>100% discount should be given to properties with energy rating of C and above.</p>	<p>Similar to above, the burden and time to assess if a tenant is long term, and verify this information, would increase the cost to the council. As the scheme is required to be cost neutral, this would increase the overall fee.</p> <p>The council will carry out inspections on properties, and if properties are found not to be compliant, the licence holder could be served with an improvement or prohibition order, or could have their licence revoked</p> <p>As stated above, the licence runs for five years. If the scheme is approved, and then if in five years the council wishes to continue a selective licensing scheme, the council may choose to review its fee structure. Whilst the council understands that this is a change for landlords in the borough unfortunately length of ownership of a property does not means that the property is kept in a good and safe condition.</p> <p>As stated above, live in landlords, where the property is their main residence, are exempt from selective licensing under the Selective Licensing of Houses (Specified Exemptions) (England) Order 2006</p> <p>The council is currently working closely with London Councils, and other London boroughs, as well as the GLA, on initiatives to improve energy performance in privately rented properties and to discharge its duties under the Minimum Energy Efficiency Standard regulations more effectively</p>

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Author	Ella McCarthy / Rhona Brown	Directorate	Housing
Date	26/09/2022	Service	Housing Partnerships & Service Improvement / Private Sector Housing Agency

1. The project or decision that this assessment is being undertaken for

Selective Licensing Scheme

The housing landscape has changed substantially in recent years and continues to do so. Greater numbers of families and single people are now relying on the private rented sector to provide a home, and not just in the short term. This is consistent with the trend across London where the growth in private renting continues.

The aim of this project has been to gain a thorough understanding of the private rented sector (PRS) (size and areas of need) in Lewisham and use this knowledge to:

- develop an implementation plan for a selective landlord licensing scheme
- submit a robust application for a licensing scheme to cover 16 out of 18 wards in the borough.

There is a requirement to submit substantial evidence and consult residents and landlords prior to introducing a selective licensing scheme.

Selective Licensing of Houses (Additional Conditions) Order 2015 states licensing can be used if the area is experiencing one or more of the following:

- Low demand
- High Anti-Social Behaviour
- High migration
- Poor housing conditions
- High levels of deprivation
- High level of crime

The overall aim of this project is to gain approval to implement the scheme for 16 out of 18 wards in the borough where evidence supports it. Implementation of the licensing scheme aims to:

- improve property standards, security and decency generally;
- help tenants feel safe and secure in their homes through advice, support and effective enforcement;
- deliver a “level playing field” for all landlords by demanding the same standards of accommodation and management across all landlords. The gap between the poor and good landlords will be radically reduced and professional standards will be raised;
- support landlords both during but also after the five year scheme, utilising the data and intelligence about the landlord sector so services can be tailored to their needs;
- assertively crack down on criminal and non-compliant landlords.

Reports have previously been submitted to Housing Select Committee and Mayor & Cabinet, and a public consultation commenced from 20th October 2021 to 20th May 2022. Following the conclusion of the consultation, a report has been prepared for the Housing Select Committee in September 2022. A further report will be submitted to Mayor and Cabinet before a submission is made.

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Maternity	<input checked="" type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Religion	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Income	

These protected characteristics have been selected since the private rented sector is open to all households and changes to the way the sector is regulated could affect anyone. It is anticipated that any impact will be positive, through better regulation of living conditions and ensuring landlords are fit and proper persons. Analysis produced

by the Greater London Authority¹ suggests that young people, migrants, and people on low incomes are more likely to be private renters, and in addition more than one third of renting households now contain dependent children. Finally, older people now also form a growing minority of private tenants. This means that efforts to improve the rental market are likely to have a disproportionately beneficial effect on those with protected characteristics or equalities factors related to age, ethnicity, income and maternity. However, there could also be a negative impact on these groups if landlords pass on the costs they incur to tenants, or if tenants are evicted as a result of enforcement action and this will need to be monitored.

Likewise, the ownership of housing is open to all households and as such the impact on landlords within these groups must be considered. In particular research conducted by Shelter and others suggests that a significant proportion of private landlords are older people.

The public consultation was promoted to reach as many residents and landlords as possible. If the scheme is approved, we will need to ensure a robust communications plan is implemented to ensure that landlords and tenants from all backgrounds are informed of the licensing requirements. This will need to consider language and accessibility requirements.

3. The evidence to support the analysis

The private rented sector

The housing landscape has changed substantially in recent years and continues to do so. Greater numbers of families and single people are now relying on the private rented sector to provide a home, and not just in the short term. This is consistent with the trend across London where the growth in private renting continues.

Between the 2001 census and 2016 the Greater London Authority (GLA) estimates that the number of households in social housing in Lewisham decreased by 14%, the number of owner occupiers increased by 9% and the number of private renters increased by 98%.

This rapid increase in the private rented sector is due in part to the unaffordability of home ownership in Lewisham as a result of rapidly increasing house prices. House prices in Lewisham have increased substantially, with the average house price now over £500,000.

In addition, there are a substantial number of households on the housing waiting list (over 10,300 households as of August 2022) and a decreasing number of lets available. This combined with the aforementioned increase in the cost of housing in Lewisham means that Lewisham residents are more reliant on the private rented sector than ever before.

Issues with the private rented sector

The condition of housing in the private rented sector is also shown to be below that of other sectors. The [2020/21 English Household Survey](#) found that privately rented dwellings were more likely to be older with 23% built before 1919, with a high proportion of converted flats and the highest proportion of non-decent homes. Housing Health and Safety Rating System (HHSRS) hazards are more prevalent in the private rented sector and the sector has the lowest proportion of homes with central heating.

Furthermore, extensive research documented in the [2010 Fair Society, Healthy Lives Marmot Review](#) demonstrates that “Bad housing conditions – including homelessness, temporary accommodation, overcrowding, insecurity, and housing in poor physical condition – constitute a risk to health”.

The [Chartered Institute of Housing and the Chartered Institute of Environmental Health carried out joint research](#) of 20 local authorities with selective licensing schemes. It found “numerous examples of inspections leading to very high numbers of serious hazards and defects being identified and addressed in licensed areas”. Licensing is not a ‘quick win’ with regard to anti-social behaviour, due to the complex nature of this problem, but it has been

¹ London Housing Strategy 2018 Equalities Impact Assessment and *Housing in London 2021*

associated with a reduction in these types of incidents. For example, one area of Doncaster saw a “reduction of 35% in noise complaints, 44% in nuisance complaints and a 20% fall in reports of unkempt properties. Fly tipping has also reduced”.

[The Independent Review of Selective Licensing](#) carried out by MHCLG in 2019 found that ‘selective licensing is an effective tool when implemented properly’ as part of a wider effort by local authorities to address the problems in the private rented sector. The report specifically sets out that the key benefits of licensing as an agent of change are that:

- selective licensing allows councils to recover the costs associated with enforcement,
- it provides a clear enforcement framework and that,
- it places a proactive, rather than reactive duty on both councils and landlords

Consultation

A public consultation was launched following detailed analysis undertaken on behalf of the council. The consultation ran for 30 weeks from 20th October 2021 to 20th May 2022. To capture as much feedback as possible from landlords, tenants, residents and other stakeholders the council used several approaches to promote the consultation across the borough, and outside the borough. Activities for the consultation, including releasing new communications and publicity, were paused during the pre-election period of (21st March 2022 to 6th May 2022), in the lead up to the 2022 local elections.

The consultation and survey were initially hosted on the Commonplace platform, with three surveys, one for each designation, to gather the feedback from stakeholders. The consultation page also had the supporting evidence for the designations, and the proposed licence conditions as well as information about the proposed fees and discounts.

Following a review of the consultation responses and consultation page in January 2022, the survey was consolidated into one survey to make it easier for respondents and for the council to gather feedback on all the designations. This was moved to the council website from the Commonplace platform. The evidence pack was also reviewed and edited to make the designations and supporting evidence clearer. This renewed evidence base, as well as the proposed licence conditions and information about the proposed fees and discounts were also available on the council website, on the same page as the survey.

1,356 people responded to the consultation. Respondents were also asked to provide some demographic information to see if the consultation had captured the views of a group representative of the borough.

When compared with borough benchmarks, “White – British” respondents were overrepresented, whereas “Black – African”, “Black - Caribbean”, “Other – Asian” and “Other – Black” were under represented by respondents who answered this question. However, this is explained in part by the fact that a very high proportion of residents from the Catford South ward responded to the consultation, and the demographics of this ward differ from the overall borough benchmarks. The response rate from BAME respondents was monitored through the consultation, and every effort was made to ensure that that the consultation was inclusive and accessed all communities. This included distributing posters and leaflets to key community centres, health centres, resident groups, theatres, libraries; direct emails to more than 400 local community and church groups and advertisements in the Council Tax mail-out, which was sent to approx.135,000 households in Lewisham.

4. The analysis

Findings relating to the size of the private rented sector

The private rented sector is an integral part of the housing landscape, and provides housing for increasing numbers of households. In Lewisham, the private rented sector makes up more than a quarter of the borough’s housing stock.

Findings relating to the issues in the private rented sector

The data analysis undertaken as part of the project has provided significant findings when considering evidence for a borough-wide selective licensing scheme in Lewisham. The particular points of interest are:

- International migrants are more likely to live in the private rented sector than other sectors and therefore likely to be affected by any decisions linked to the private rented sector
- Levels of deprivation tend to be higher in wards with more privately rented homes and therefore people experiencing lower incomes and high unemployment, for example, are likely to be affected by any decisions linked to the private sector

Impact of project on protected characteristics based on findings

Based on the findings, it is rational to consider all protected characteristics when considering a borough-wide licensing scheme as it would affect all tenants and landlords, who could display any number of protected characteristics. In particular, positive impacts can be expected for those living in the private rented sector. Private tenants will come from all sections of community; above findings placing particular focus on international migrants and those on low incomes.

The below positive effects are expected to apply to all groups with protected characteristics:

- Additional monitoring of landlords will prevent unlawful practice in the form of discrimination on the grounds of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.
- Additional monitoring of landlords will provide the Council with greater control over poor landlord practice such as not tackling anti-social behaviour. As a result instances of ASB, discrimination and hate crime are expected to be reduced.
- Licensing will improve the standards of privately rented homes resulting in better accommodation, thereby reducing negative impacts on health – particularly by reducing instances of HHSRS hazards.
- Licensing will improve security of tenure for tenants, as landlords will not be able to evict good tenants as easily as they can in unlicensed properties. As a consequence tenant turnover may be reduced resulting in better opportunities for increased community cohesion.

The below negative effects are expected to apply to all groups with protected characteristics:

- If the scheme is approved, landlords will be obliged to pay license fees. This may negatively impact their ability to rent out their properties.
- There is a risk that licensing will discourage private renting which would reduce the supply of property for private renters.
- There is also a risk that landlords will divert fees to tenants via the rent, affecting tenants' ability to afford their rent.

Consultation Response

Analysis of responses suggested that there was widespread support from respondents for the introduction of a selective licensing scheme. Owner occupiers, privately renting tenants and housing association/council tenants generally tended to be in favour of the proposals, whereas landlords and representatives of letting/managing agents tended to be opposed. This reflects the rapid growth of the private rented sector as a source of accommodation for an increasing number of households. As the sector grows it is increasingly representative of the local area as a whole, and the wide range of responses that were received as part of the consultation is reflective of this.

5. Impact summary

Age

The following should be considered:

- Ease of responding to consultation for elderly stakeholders
- If scheme approved - ease of applying for a license for elderly landlords
- If scheme approved and landlords divert fees to tenants via the rent, this may affect elderly tenants' affordability - they may be less able than others to find resources to cover the increased rent.
- Licensing will increase landlords' knowledge of legal requirements, positively impacting vulnerable tenants such as the elderly.

- As per the aforementioned [Marmot Review](#), a child's physical and mental health and education attainment is negatively impacted by poor accommodation standards. Licensing will improve the standards of privately rented homes, positively impacting pregnant women, mothers and their children.
- Similarly, improved accommodation will positively impact the health of elderly people.

Ethnicity

The following should be considered:

- Residents with non-British ethnicity may be international migrants. High international migration suggests a level of transience in the borough's residents and therefore a high demand for privately rented properties. This is corroborated by the rapid increase in the private rented sector between the 2001 census and today. There is a risk that licensing will discourage private renting which would reduce the supply of property required.
- Conversely, data analysis shows that international migrants are more likely to live in private rented homes. Improved standards in this sector will therefore positively impact international migrants relying on the private rented sector.

Maternity

The following should be considered:

- If scheme approved and landlords divert fees to tenants via the rent, this may affect tenants' affordability if their income is affected by a period of maternity leave - they may be less able than others to find resources to cover the increased rent.
- Licensing will improve the standards of privately rented homes, positively impacting the health of pregnant women, mothers and their children.

Language spoken

The following should be considered:

- When writing up consultation documents, the needs of stakeholders where English is not their first language need to be considered.
- If scheme approved – when providing information regarding the requirement to licence, the needs of landlords where English is not their first language need to be considered.
- As demonstrated in the data analysis, there is a relatively high proportion of international migration into Lewisham. Unfortunately there are rogue landlords who exploit foreign tenants who may not know their rights and/or obligations as tenants and who may struggle to understand these if they are not fluent in English. Selective licensing would increase the Council's ability to address these landlords and ensure a safe and secure home for Lewisham's private tenants.
- Licensing will improve the standards of privately rented homes resulting in better accommodation and security of tenure for tenants. As a consequence tenant turnover may be reduced resulting in increased community cohesion.
- Residents where English is not their first language may be international migrants. High international migration suggests a level of transience in the borough's residents and therefore a high demand for privately rented properties. There is a risk that licensing will discourage private renting which would reduce the supply of property required.
- Conversely, we know from data analysis that international migrants are more likely to live in private rented homes. Improved standards in this sector will therefore positively impact international migrants relying on the private rented sector.

Gender

Proposed licensing and the associated consultation have no specific gender-related impact, however additional monitoring of landlords will provide the Council with greater control over poor landlord practice such as not tackling ASB. As a result instances of ASB, discrimination and hate crime will be reduced.

Gender identity

Proposed licensing and the associated consultation have no specific gender identity-related impact, however additional monitoring of landlords will provide the Council with greater control over poor landlord practice such as not tackling ASB. As a result instances of ASB, discrimination and hate crime will be reduced.

Disability

The following should be considered:

- When writing up consultation documents, the needs of stakeholders with disabilities need to be considered.
- If scheme approved – when providing information regarding the requirement to licence, the needs of landlords with disabilities need to be considered.
- The negative health impacts of poor standards of accommodation are well documented. As part of licensing the Council will be working closer with landlords in order to support them in providing decent homes for their tenants. This has the potential to positively impact tenants with disabilities, for example licensing will help to ensure that properties are up to standard and therefore not having an adverse effect on the health and lifestyle of tenants with disabilities.
- Licensing will increase Landlords' knowledge of legal requirements positively impacting vulnerable tenants.

Household type

The following should be considered:

- If fees are deemed to be prohibitive there is a risk that licensing will discourage private renting which would reduce the supply of property required.
- Conversely, the proposed licensing schemes will give the Council greater control to bring private rented homes to required standards and crack down on rogue landlords – thereby improving safety and security for all household types.
- There is no evidence from other London boroughs who have introduced selective licensing that this form of regulation has any impact on the size of the market or the availability of rental accommodation, which is much more likely to be driven by global factors such as demand for accommodation, achievable rental yields and house prices.

Religion

Proposed licensing has no specific religion-related impact. However licensing will improve the standards of privately rented homes resulting in better accommodation and security of tenure for tenants. As a consequence tenant turnover may be reduced resulting in increased community cohesion.

Carer status

The following should be considered:

- If a carer resides with the person they are caring for in a privately rented home, both tenants may be adversely affected if scheme is approved and landlords divert fees to tenants via the rent. Both a full time carer and the cared-for person are likely to have relatively low incomes so may be less able than others to find resources to cover the increased rent.
- Conversely licensing will help to ensure that properties are up to standard and therefore not having an adverse effect on the health and lifestyle of tenants with care needs. Subsequent positive impacts on type and amount of support needed from their carer(s) can be expected.

Sexual orientation

Proposed licensing has no specific sexual orientation-related impact, however additional monitoring of landlords will provide the Council with greater control over poor landlord practice such as not tackling ASB. As a result instances of ASB, discrimination and hate crime will be reduced.

Income

The following should be considered:

- If scheme approved and landlords divert fees to tenants via the rent, this may affect tenants' affordability depending on their income.
- If scheme approved, landlords with lower incomes may be less able than other landlords to find resources to cover the fees. Again this may increase the chance of them passing on the fees to tenants, or discourage private renting.

6. Mitigation

The main issues arising from the above impact summary are:

1. Understanding of requirement to license and ease of application process (adaptability and language concerns)
2. Diversion of fees to tenants and the impact on tenants
3. Discouragement of private renting, thereby reducing property supply in the private rented sector.

Mitigation actions considered:

1. If the scheme is approved, the requirements to license will be advertised across numerous forums and media, including local news, via leaflets, local publications, landlord resources, mailing lists, etc. A detailed communications plan will be developed in order to ensure that landlords from all sections of the community are aware of their obligations.

The application process will be kept as simple as possible and the Private Sector Housing Agency will support landlords where required. Information provided online and elsewhere will be written in plain English without jargon / acronyms.

2. Licenses will last for five years, making the monthly liability small.
3. The proposed schemes are part of wider actions to work with decent landlords and support them in providing a decent private rental sector for Lewisham's residents. Plans include best practice guides, landlord forums and advice on dealing with issues affecting the private rented sector. This work will continue after the scheme has ended, providing a lasting legacy and ensuring long term help for landlords beyond the period of the scheme.

Licensing will also encourage landlords to take advantage of the financial support available for their licensed properties, for example grants for:

- bringing homes up to decent homes standard
- resolving category 1 or 2 hazards
- providing adequate facilities and amenities in HMOs
- providing adequate insulation
- bringing empty properties back into use (non-HMOs)
- converting properties into self-contained flats / maisonettes (non-HMOs)

This work is anticipated to improve our network of decent landlords, develop mutually beneficial partnerships with them and increase the supply of safe, warm and decent housing accommodation in the private rented sector.

7. Service user journey that this decision or project impacts

If schemes approved:

- Landlords will be informed about the requirements to licence via a variety of media as part of a robust communications plan. This will include the prescribed manner as defined by national authorities as per the Housing Act.
- Landlords can apply for their license online. If applications are made during the prescribed 'early-bird' period, reduced fees will apply.
- Landlords can contact the Private Sector Housing Agency for support / concerns.
- Tenants can contact the Private Sector Housing Agency for support / concerns about their landlord's license and health and safety concerns.

Savings proposals:

- These proposals are not part of a savings proposal.
- The scheme will wholly cover the costs of licensing and enforcement and will not make a profit.

- However, the anticipated reduction in issues linked to the private rented sector (e.g. relevant crimes and ASB) will deliver long-term savings and improvement in safety and security for our residents. The licensing schemes will be part of a wider strategy to work closer with partners such as the police to ensure that the schemes are delivering the anticipated improvements.
- Improvements in housing conditions will also deliver savings in the long term as the enforcement burden on the Council will reduce. Again, this ties in with a wider partnership strategy to work with partners such as London Fire Brigade and registered housing providers to ensure that privately rented homes are safe, secure and decent for Lewisham’s residents.

Signature of Head of Service	
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For further information please see the full [Corporate Equality Policy](#).

DRAFT



Housing Select Committee

Select Committee Work Programme Report

Date: 12 October 2022

Key decision: No.

Class: Part 1

Ward(s) affected: Not applicable

Contributor: Timothy Andrew (Scrutiny Manager)

Outline and recommendations

This report gives Committee members an opportunity to review the Committee's work programme and make any modifications required.

The Committee is asked to:

- To review the work programme attached at Appendix B.
- To consider the items for the next meeting and specify the information required.
- To review the forward plan of key decisions at Appendix E to consider whether there are any items for further scrutiny.

Timeline of decision-making

Housing Select Committee work programme 2022/23 – draft agreed on 06.06.22

Work programme 2022/23 – agreed by Business Panel on 19.07.22

1. Summary

- 1.1. The committee proposed a draft work programme at the beginning of the municipal year. This was considered alongside the draft work programmes of the other select committees and agreed by Business Panel on 19 July 2022.
- 1.2. The work programme should be reviewed at each meeting to take account of changing priorities.

2. Recommendations

- 2.1. The Committee is asked to:
 - To review the work programme attached at Appendix B.
 - Consider the items for the next meeting and specify what evidence is required, including being clear about the information the committee wishes to be included in officer reports.
 - To review the forward plan of key decisions at Appendix E to consider whether there are any items for further scrutiny.

3. Work Programming

- 3.1. When reviewing the work programme the Committee should consider the following:

- 3.2. The Committee's terms of reference (Appendix A). The Committee's areas of responsibility, include, but are not limited to:

- Homelessness and rough sleeping
- Social housing
- Affordable housing
- Private rented sector

The Committee has a key role in scrutinising the performance and supporting the development of the council's housing-related strategies and policies. It also has a role in engaging and reflecting the views of residents in relation to housing-related matters.

- 3.3. Whether any urgent issues have arisen that require scrutiny. If so, consider to the prioritisation process (Appendix C) and the Effective Scrutiny Guidelines (Appendix D)
- 3.4. Whether a committee meeting is the most effective forum for scrutinising the issue. For example, would a briefing be more appropriate?
- 3.5. Whether there is capacity to consider the item - could any work programme items be removed or rescheduled?
- 3.6. Whether the item links to the priorities set out in the [Corporate Strategy for 2018-2022](#):
 - [Open Lewisham](#) - Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.
 - [Tackling the housing crisis](#) - Everyone has a decent home that is secure and affordable.
 - [Giving children and young people the best start in life](#) - Every child has access to an outstanding and inspiring education, and is given the support they need to keep them safe, well and able to achieve their full potential.
 - [Building an inclusive local economy](#) - Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.

- [Delivering and defending: health, social care and support](#) - Ensuring everyone receives the health, mental health, social care and support services they need.
- [Making Lewisham greener](#) - Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.
- [Building safer communities](#) - Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

3.7 A new Corporate Strategy is currently in development, which will include a refreshed set of priorities and describe how the Council will address the social, economic and environmental challenges facing the borough up to 2026. Once this is in place, the Committee may wish to review its work programme in light of the new strategy.

3.8 The committee should also note and take into account the four strategic themes of the borough's Covid-19 recovery plan, Future Lewisham, which support what we want for every single resident and that we know are what we need to focus on locally: *An economically sound future; A healthy and well future; A greener future; and a future we all have a part in.*

4. The next meeting

- 4.1. The following items are scheduled for the next meeting. For each item, the Committee should clearly define the information and analysis it wishes to see in officer reports. If the Committee has designated one of its members as a climate change champion, that member should work with the Chair to ensure that officers are given appropriate steers in relation to the reports, to ensure they include relevant climate change considerations.
- 4.2. The Committee should also consider whether to invite any expert witnesses to provide evidence, and whether site visits or engagement would assist the effective scrutiny of the item.

Agenda Item	Information and analysis required	Review type	Corporate Priority
Budget cuts proposals		Standard item	CP2
Lewisham Homes repairs update		Standard item	CP2
Temporary accommodation procurement strategy		Standard item	CP2
Update on housing management consultation		Standard item	CP2

5. Scrutiny between meetings

- 5.1. Below is a tracker of scrutiny activity, including briefings, visits and engagement, that has taken place outside of the committee meetings.

Agenda Item	Date due	Outcome	Corporate Priority
Visit to Sydney Arms rough sleeper accommodation	5 th August 2022	Insight into one of the council's latest initiatives in relation to homelessness.	CP2
Building for Lewisham development programme figures	8 th July 2022	Data shared with members following request at committee.	CP2

6. Financial implications

- 6.1. There are no direct financial implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme will have financial implications and these will need to be considered as part of the reports on those items.

7. Legal implications

- 7.1. In accordance with the Council's Constitution, all scrutiny select committees must devise and submit a work programme to the Business Panel at the start of each municipal year.

8. Equalities implications

- 8.1. Equality Act 2010 brought together all previous equality legislation in England, Scotland and Wales. The Act included a new public sector equality duty, replacing the separate duties relating to race, disability and gender equality. The duty came into force on 6 April 2011. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.2. The Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 8.3. There may be equalities implications arising from items on the work programme and all activities undertaken by the Select Committee will need to give due consideration to this.

9. Climate change and environmental implications

- 9.1. There are no direct climate change or environmental implications arising from the implementation of the recommendations in this report. However, in February 2019 Lewisham Council declared a Climate Emergency and proposed a target to make the borough carbon neutral by 2030. An action plan to achieve this target was subsequently agreed by Mayor and Cabinet (following pre-decision scrutiny by the Sustainable Development Select Committee)¹. The plan incorporates all areas of the Council's work. Items on the work programme may well have climate change and environmental implications and reports considered by the Committee should acknowledge this.

10. Crime and disorder implications

- 10.1. There are no direct crime and disorder implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have crime and disorder implications and these will need to be considered as part of the reports on those items.

11. Health and wellbeing implications

- 11.1. There are no direct health and wellbeing implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have health and wellbeing implications and these will need to be considered as part of the reports on those items.

12. Report author and contact

If you have any questions about this report please contact: Timothy Andrew, 020 8314 7916 Timothy.Andrew@lewisham.gov.uk

¹ See <https://lewisham.gov.uk/TacklingTheClimateEmergency> for a summary of the Council's work in this area.

Appendix A – Housing Select Committee Terms of Reference

The following roles are common to all select committees:

(a) General functions

- To review and scrutinise decisions made and actions taken in relation to executive and non-executive functions
- To make reports and recommendations to the Council or the executive, arising out of such review and scrutiny in relation to any executive or non-executive function
- To make reports or recommendations to the Council and/or Executive in relation to matters affecting the area or its residents
- The right to require the attendance of members and officers to answer questions includes a right to require a member to attend to answer questions on up and coming decisions

(b) Policy development

- To assist the executive in matters of policy development by in depth analysis of strategic policy issues facing the Council for report and/or recommendation to the Executive or Council or committee as appropriate
- To conduct research, community and/or other consultation in the analysis of policy options available to the Council
- To liaise with other public organisations operating in the borough – both national, regional and local, to ensure that the interests of local people are enhanced by collaborative working in policy development wherever possible

(c) Scrutiny

- To scrutinise the decisions made by and the performance of the Executive and other committees and Council officers both in relation to individual decisions made and over time
- To scrutinise previous performance of the Council in relation to its policy objectives/performance targets and/or particular service areas
- To question members of the Executive or appropriate committees and executive directors personally about decisions
- To question members of the Executive or appropriate committees and executive directors in relation to previous performance whether generally in comparison with service plans and targets over time or in relation to particular initiatives which have been implemented
- To scrutinise the performance of other public bodies in the borough and to invite them to make reports to and/or address the select committee/Business Panel and local people about their activities and performance
- To question and gather evidence from any person outside the Council (with their consent)
- To make recommendations to the Executive or appropriate committee and/or Council arising from the outcome of the scrutiny process

(d) Community representation

- To promote and put into effect closer links between overview and scrutiny members and the local community
- To encourage and stimulate an enhanced community representative role for overview and scrutiny members including enhanced methods of consultation with local people
- To liaise with the Council's ward assemblies so that the local community might participate in the democratic process and where it considers it appropriate to seek the views of the ward assemblies on matters that affect or are likely to affect the local areas, including accepting items for the agenda of the appropriate select committee from ward assemblies.
- To keep the Council's local ward assemblies under review and to make recommendations to the Executive and/or Council as to how participation in the democratic process by local

people can be enhanced

- To receive petitions, deputations and representations from local people and other stakeholders about areas of concern within their overview and scrutiny remit, to refer them to the Executive, appropriate committee or officer for action, with a recommendation or report if the committee considers that necessary
- To consider any referral within their remit referred to it by a member under the Councillor Call for Action, and if they consider it appropriate to scrutinise decisions and/or actions taken in relation to that matter, and/or make recommendations/report to the Executive (for executive matters) or the Council (non-executive matters).

(e) Finance

- To exercise overall responsibility for finances made available to it for use in the performance of its overview and scrutiny function.

(f) Work programme

- As far as possible to draw up a draft annual work programme in each municipal year for consideration by the overview and scrutiny Business Panel. Once approved by the Business Panel, the relevant select committee will implement the programme during that municipal year. Nothing in this arrangement inhibits the right of every member of a select committee (or the Business Panel) to place an item on the agenda of that select committee (or Business Panel respectively) for discussion.
- The Council and the Executive will also be able to request that the overview and scrutiny select committee research and/or report on matters of concern and the select committee will consider whether the work can be carried out as requested. If it can be accommodated, the select committee will perform it. If the committee has reservations about performing the requested work, it will refer the matter to the Business Panel for decision.

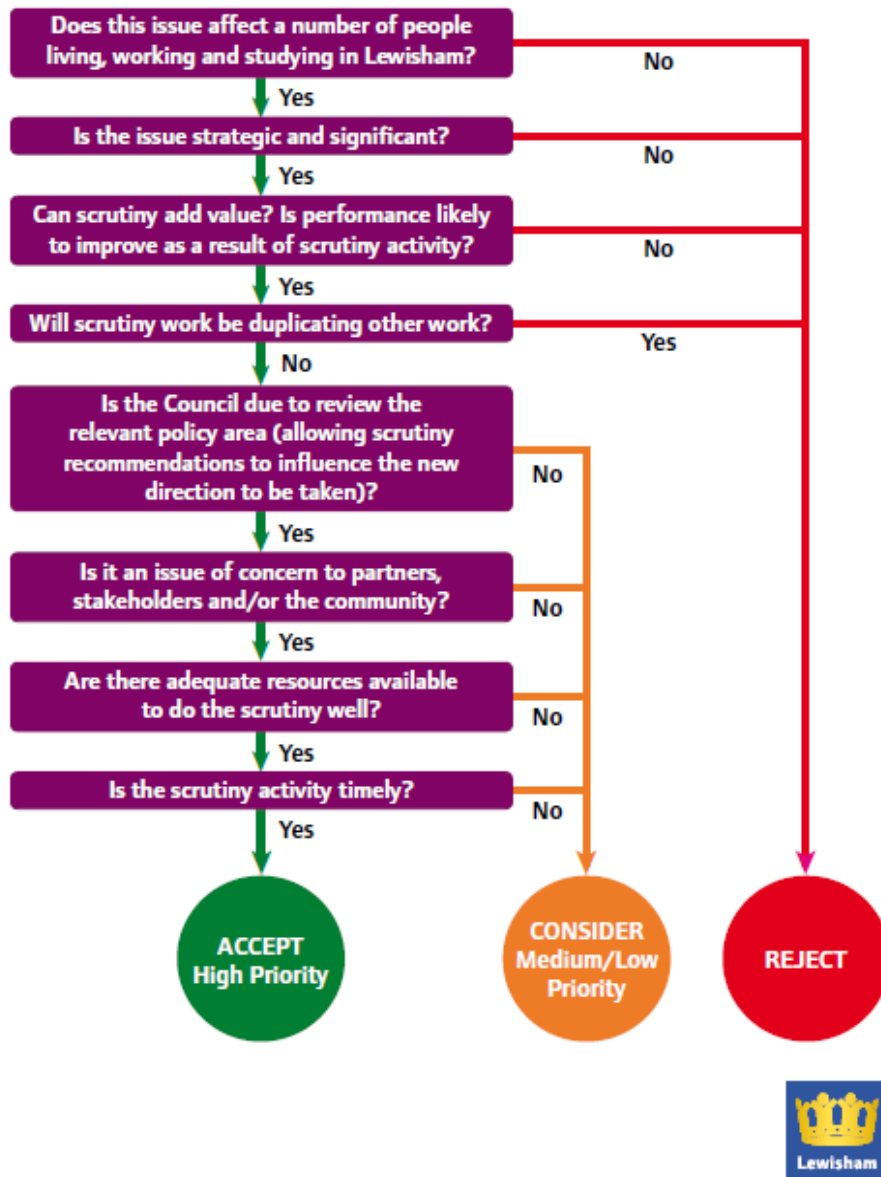
The Housing Select Committee has specific responsibilities for the following:

- a) To fulfil all overview and scrutiny functions in relation to the discharge by the authority of its housing functions. This shall include the power to:
- b) review and scrutinise decisions made or other action taken in connection with the discharge of the Council of its housing function
- c) make reports or recommendations to the authority and/or Mayor and Cabinet with respect to the discharge of these functions
- d) make recommendations to the authority and/or Mayor and Cabinet proposals for housing policy
- e) to review initiatives put in place by the Council with a view to improving, increasing and enhancing housing in the borough, making recommendations and/or report thereon to the Council and/or Mayor and Cabinet
- f) To establish links with housing providers in the borough which are concerned with the provision of social housing

Appendix C

The flowchart below is designed to help Members decide which items should be added to the work programme. It is important to focus on areas where the Committee will influence decision-making.

Scrutiny work programme – prioritisation process



Appendix D

Effective Scrutiny Guidelines

At Lewisham we:

1. Prioritise

It is more effective to look at a small number of key issues in an in-depth way, than skim the surface of everything falling within scrutiny's remit. We try to focus on issues of concern to the community and/or matters that are linked to our corporate priorities. We only add items to the work programme if we are certain our consideration of the matter will make a real and tangible difference.

2. Are independent

Scrutiny is led by Scrutiny Members. Scrutiny Members are in charge of the work programme and, for every item, we specify what evidence we require and what information we would like to see in any officer reports that are prepared. We are not whipped by our political party or unduly influenced by the Cabinet or senior officers.

3. Work collectively

If we collectively agree in advance what we want to achieve in relation to each item under consideration, including what the key lines of enquiry should be, we can work as a team to question witnesses and ensure that all the required evidence is gathered. Scrutiny is impartial and the scrutiny process should be free from political point scoring and not used to further party political objectives.

4. Engage

Involving residents helps scrutiny access a wider range of ideas and knowledge, listen to a broader range of voices and better understand the opinions of residents and service users. Engagement helps ensure that recommendations result in residents' wants and needs being more effectively met.

5. Make SMART evidence-based recommendations

We make recommendations that are based on solid, triangulated evidence – where a variety of sources of evidence point to a change in practice that will positively alter outcomes. We recognise that recommendations are more powerful if they are:

- Specific (simple, sensible, significant).
- Measurable (meaningful, motivating).
- Achievable (agreed, attainable).
- Relevant (reasonable, realistic and resourced, results-based).
- Time bound (time-based, time limited, time/cost limited, timely, time-sensitive).

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Housing Select Committee work plan 2022-23

Item	Type	Priority	06-Jun-22	12-Oct-22	17-Nov-22	11-Jan-23	09-Mar-23
Article 4 direction for HMOs	Standard item	CP2					
Housing Revenue Account business plan	Standard item	CP2					
Future of housing managed by Lewisham Homes	Standard item	CP2					
Lewisham Homes business plan	Standard item	CP2					
Service charge policy	Standard item	CP2					
Lewisham Homes annual report	Standard item	CP2					
Selective licensing	Standard item	CP2					
Temporary accommodation procurement strategy	Standard item	CP2					
Budget cuts proposals	Standard item	CP2					
Lewisham Homes repairs update	Standard item	CP2					
Update on housing management consultation	Standard item	CP2					
Housing retrofit - housing partners	Standard item	CP2					
Resident engagement in housing development (update)	Standard item	CP2					
Homelessness & Rough Sleeping Strategy	Standard item	CP2					
TBC							

Information items

Regenter B3 annual report and business plan	Performance monitoring	CP2					
Rent and service charge increases	Performance monitoring	CP2					
Exempt accommodation	Information request	CP2					
Building for Lewisham update	Information request	CP2					

Corporate Priorities

Priority

1	Open Lewisham	CP 1
2	Tackling the Housing Crisis	CP 2
3	Giving Children and young people the best start in life.	CP 3
4	Building an inclusive local economy	CP 4
5	Delivering and defending: health, social care and support	CP 5
6	Making Lewisham greener	CP 6
7	Building Safer Communities	CP 7

FORWARD PLAN OF KEY DECISIONS

Forward Plan October 2022 - February 2023

This Forward Plan sets out the key decisions the Council expects to take during the next four months.

Anyone wishing to make representations on a decision should submit them in writing as soon as possible to the relevant contact officer (shown as number (7) in the key overleaf). Any representations made less than 3 days before the meeting should be sent to Emma Aye-Kumi, the Local Democracy Officer, at the Council Offices or emma.aye-kumi@lewisham.gov.uk. However the deadline will be 4pm on the working day prior to the meeting.

A "key decision"* means an executive decision which is likely to:

- (a) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates;
- (b) be significant in terms of its effects on communities living or working in an area comprising two or more wards.

January 2022	Contract for Statutory Funeral Provision	28/06/22 Executive Director for Community Services	Corinne Moocarme, Joint Commissioning Lead, Community Support and Care, Community Services, LBL and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Digital Infrastructure Fibre	28/06/22	and Councillor Amanda		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	Wayleave	Executive Director for Corporate Services	De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Expert Assessors services for Concessionary Award Schemes	28/06/22 Executive Director for Corporate Services	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Expert Assessors Services for Concessionary Award Services	28/06/22 Executive Director for Corporate Services	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
May 2022	Procurement of a replacement Housing Management System and implementation of a Customer Relationship Management System.	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Procurement of Learning and Development Services Provider	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Procurement of Replacement Housing Management System and implementation of Customer Relationship Management System	28/06/22 Executive Director for Corporate Services	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Authority to procure ASD Post Diagnosis Parent Support	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Performance		
June 2022	Authority to Procure Mediation and Disagreement Resolution Service	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure SEN and Disabilities Advice and Support Services	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to Procure SEN Transport - Dynamic Purchasing System Licence	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Authority to procure Specialist Short Breaks - Mentoring Programme	19/07/22 Executive Director for Children and Young People	and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Approval for s106 monies to go to Deptford Challenge Trust	14/09/22 Mayor and Cabinet	and Councillor Kim Powell, Cabinet Member for Businesses, Jobs and Skills		
June 2022	Carer Information Advice and Support Services - permission to procure	14/09/22 Mayor and Cabinet	Joanne Lee, Contracts Monitoring Officer and Councillor Paul Bell, Cabinet Member for Health and Adult Social		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Care		
June 2022	Reduction and Recycling Plan 2023-2025	14/09/22 Mayor and Cabinet	Wendy Nicholas, Strategic Waste and Environment Manager and Councillor Louise Krupski, Cabinet Member for Environment and Climate		
August 2022	Award of Corporate Estate Maintenance Programme Contract 2, Phase 1	27/09/22 Executive Director for Housing, Regeneration & Environment	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Award of Corporate Estate Maintenance Programme Contract 3, Phase 1	27/09/22 Executive Director for Housing, Regeneration & Environment	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Approval to procure - Beckeham Place Park Eastern side works	05/10/22 Mayor and Cabinet	Adam Platts, Project Manager and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		
August 2022	Contract for Microsoft Licences - EMT approval to use framework. Mayor and Cabinet to note procurement and delegate authority for award to ED of Corporate Resources.	05/10/22 Mayor and Cabinet	Philippa Brewin and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Highways and Transport	05/10/22	Zahur Khan, Director of		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	Services Framework Contract award Previously referred to as Public Realm Framework Contract	Mayor and Cabinet	Public Realm and Councillor Louise Krupski, Cabinet Member for Environment and Climate		
June 2022	Highways Planned and Unplanned Maintenance Contract	05/10/22 Mayor and Cabinet	Zahur Khan, Director of Public Realm and Councillor Louise Krupski, Cabinet Member for Environment and Climate		
June 2022	Lewisham Education Strategy	05/10/22 Mayor and Cabinet	Angela Scattergood, Director of Education Services, Education Standards and Inclusion and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
May 2022	Lewisham Play Strategy 2022 - 2027	05/10/22 Mayor and Cabinet	Sara Rahman and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
August 2022	Microsoft Office 365 E5 licencing (part 2 report)	05/10/22 Mayor and Cabinet	Wendy Carr and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Treasury Management Strategy	05/10/22	David Austin, Director of		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	Mid-Year Review	Mayor and Cabinet	Corporate Services and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Award of a Contract for Microsoft Licences.	Not before 11/10/22 Executive Director for Corporate Services	Philippa Brewin and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Approval for the Local Development Scheme (LDS)	02/11/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
May 2022	Approval of the Lewisham Local Plan - Regulation 19 Proposed Submission document for public consultation	02/11/22 Mayor and Cabinet	David Syme, Head of Strategic Planning and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
October 2022	Approval to procure for the provision of pre-paid card accounts	02/11/22 Executive Director for Corporate Services	Adeolu Solarin, MARAC Co-ordinator and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	Award of Contract (Stop Smoking Service)	02/11/22 Mayor and Cabinet	Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			and Planning and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
June 2022	BfL Appropriation for Planning purposes	02/11/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Sophie Davis, Cabinet Member for Housing Management and Homelessness		
February 2022	BfL Programme - Approval to enter into contract	02/11/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Consultation on a borough-wide Public Space Protection Order	02/11/22 Mayor and Cabinet	and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		
August 2022	Contract Variation and Contract Award for Specialist Sexual and Reproductive Health Services	02/11/22 Mayor and Cabinet	Iain McDiarmid and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
June 2022	Highways and Traffic Works Partnering Contract	02/11/22 Mayor and Cabinet	Zahur Khan, Director of Public Realm and		

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
			Councillor Louise Krupski, Cabinet Member for Environment and Climate		
August 2022	Launch of Lewisham Climate Action Bond	02/11/22 Mayor and Cabinet	and		
January 2022	Lewisham Autism Strategy	02/11/22 Mayor and Cabinet	Polly Pascoe, Integrated Commissioning Manager and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
August 2022	Management of Parks and Open Spaces	02/11/22 Mayor and Cabinet	James Lee, Director of Communities, Partnerships and Leisure and		
August 2022	Oak Hill Nursery expansion of Commercial Lease into Designated Children Centre	02/11/22 Mayor and Cabinet	Michael Grant, Early Intervention Business Manager and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Part 1 - Notification of the transfer of Conrad Court Extra Care Housing	02/11/22 Mayor and Cabinet	Beate Hellowell, Scrutiny Manager and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
June 2022	Part 1 - Recommendation for	02/11/22	Heather Hughes, Joint		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
	the delivery of Extra Care Services at Hazlehurst Court, Catford	Mayor and Cabinet	Commissioner, Learning Disabilities and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
June 2022	Permission to Tender Lawrence House Ground Floor Refurbishment Works	02/11/22 Executive Director for Housing, Regeneration & Environment	Gavin Plaskitt, Programme Manager and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Request to award Rough Sleeper Initiative Year 5 services Part 2	02/11/22 Executive Director for Community Services	Jonathan Scarth and Councillor Sophie Davis, Cabinet Member for Housing Management and Homelessness		
June 2022	Service Charge Policy	02/11/22 Mayor and Cabinet	Fenella Beckman, Director of Housing and Councillor Sophie Davis, Cabinet Member for Housing Management and Homelessness		
August 2022	The Corporate Strategy (2022-2026) of Lewisham Council	02/11/22 Mayor and Cabinet	Salena Mulhere, Assistant Chief Executive and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Walsham - Budget Requirement	02/11/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Brenda Dacres, Deputy		

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			Mayor and Cabinet Member for Housing Development and Planning		
August 2022	Award of Corporate Estate Maintenance Contract Phase 2	15/11/22 Executive Director for Housing, Regeneration & Environment	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
November 2021	Award of Corporate Estate Maintenance Programme Phases 1 & 2 works contract	Before 15/11/22 Executive Director for Housing, Regeneration & Environment	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
May 2022	Meliot Centre Relocation Contract Award	Before 15/11/22 Executive Director for Housing, Regeneration & Environment	and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
June 2022	Approval of the Lewisham Local Plan (Regulation 19 'Proposed Submission' document for public consultation	23/11/22 Council	David Syme, Head of Strategic Planning and		
June 2022	Approval to appoint operator for concessions contract at Beckenham Place Park Lake	Not before 01/12/22 Mayor and Cabinet	Vince Buchanan, Green Spaces Contracts Manager and Councillor Andre Bourne, Cabinet Member for Culture and Leisure (job share)		

FORWARD PLAN – KEY DECISIONS

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June 2022	Accommodation Procurement Strategy	07/12/22 Mayor and Cabinet	Fenella Beckman, Director of Housing and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
August 2022	Award report for NHS Health Checks provision	07/12/22 Mayor and Cabinet	Iain McDiarmid and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
August 2022	Award report for NHS Health Checks provision	07/12/22 Mayor and Cabinet	Iain McDiarmid and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
August 2022	Award reports for Adult Weight Management Services: Universal Offer; Targeted Offer	07/12/22 Executive Director for Community Services	Iain McDiarmid and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
August 2022	Brownfield Land Release Fund (BLRF)	07/12/22 Mayor and Cabinet	Monique Wallace, Planning Manager, Strategic Housing and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		

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May 2022	On Street Advertising Contract Variation and Extension	Not before 07/12/22 Mayor and Cabinet	and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Overview of the Family Hubs and Start for Life Programme 2022-25	07/12/22 Mayor and Cabinet	Serita Kwofie and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
August 2022	Overview of the Family Hubs and Start for Life Programme 2022-25	07/12/22 Mayor and Cabinet	Serita Kwofie and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Parts 1 & 2 - Recommendation regarding the delivery of Extra Care Services by Housing 21 at Cinnamon Court Deptford	07/12/22 Mayor and Cabinet	Beate Hellawell, Scrutiny Manager and Councillor Juliet Campbell, Cabinet Member for Communities, Refugees and Wellbeing		
August 2022	Permission to Award Supported Accommodation services	07/12/22 Mayor and Cabinet	Jonathan Scarth and Councillor Paul Bell, Cabinet Member for Health and Adult Social Care		
October 2022	Revised Instrument of Government for Sir Francis Drake School	07/12/22 Executive Director for Children and Young People	Genevieve Macklin, Head of Strategic Housing and Councillor Chris Barnham, Cabinet Member for Children's		

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			Services and School Performance		
June 2022	Right to Buyback 2	07/12/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
August 2022	Valentines Court - Approval to get into contract	07/12/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		
October 2022	Approval to procure: School Minor Works Programme 2023 (SMWP 23)	13/12/22 Executive Director for Children and Young People	Jessie Lea, Senior Programme Manager and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
June 2022	Building for Lewisham Budget requirements Pt1 & Pt2	11/01/23 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Brenda Dacres, Deputy Mayor and Cabinet Member for Housing Development and Planning		

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June 2022	Council Tax Base Report 2023/24	11/01/23 Mayor and Cabinet	Katharine Nidd, Strategic Procurement and Commercial Services Manager and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
August 2022	Financial Monitoring Period 8	11/01/23 Mayor and Cabinet	Nick Penny, Head of Service Finance and Councillor Amanda De Ryk, Cabinet Member for Finance and Strategy		
June 2022	BfL Programme - Approval to enter into contract	08/02/23 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Sophie Davis, Cabinet Member for Housing Management and Homelessness		

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