



# **Consultation on Private Sector Property Licensing in Lewisham**

## **Consultation Report**

DRAFT

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## Glossary

Term	Meaning
<b>Additional Licensing</b>	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.
<b>Anti-social behaviour (ASB)</b>	Behaviour related to a rented property that causes annoyance and irritation to neighbours and the community. Most commonly noise, litter and waste.
<b>Barriers to housing and services</b>	One of the government's measures of deprivation. It combines elements relating to housing affordability, overcrowding and homelessness.
<b>Category 1 hazard (Cat 1 hazard)</b>	A serious or immediate risk to a person's health and safety that is related to housing.
<b>Category 2 hazard</b>	A less serious or less urgent risk that can still be regarded as placing the occupiers' health, safety and welfare at risk.
<b>Deprivation</b>	Living on low income and not having the money to pay for basic requirements.
<b>Designation</b>	Geographical area chosen for licensing based on evidence.
<b>DLUHC</b>	Department for Levelling Up, Housing and Communities
<b>HMO</b>	A property let to 3 or more unrelated people, forming 2 or more households who share amenities such as a kitchen or bathroom
<b>Housing Health and Safety Rating System (HHSRS)</b>	Government prescribed system that rates housing hazards based on their risk to occupiers' health, safety, and welfare.
<b>Indices of Multiple Deprivation</b>	A dataset produced by the government to give a relative value to how deprived an area is, compared to the rest of the country.
<b>Mandatory HMO Licensing</b>	National scheme which requires landlords to have a licence to legally let their property to five or more unrelated sharers.
<b>Private rented sector (PRS)</b>	The portion of housing in the district that is rented from private landlords.
<b>Privately rented</b>	Homes rented from a private landlord.
<b>Selective Licensing</b>	A local scheme which requires landlords to have a licence to legally let their property to a family or two sharers.
<b>Socially rented</b>	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 20<sup>th</sup> October 2021 to 20<sup>th</sup> 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
<b>Agree with selective licensing in Designation 1</b>	<b>52%</b>	13%	69%	69%
<b>Disagree with selective licensing in Designation 1</b>	<b>36%</b>	70%	17%	23%
Total consultation survey responses	1064	337	242	488
<b>Agree with selective licensing in Designation 2</b>	<b>47%</b>	10%	66%	63%
<b>Disagree with selective licensing in Designation 2</b>	<b>37%</b>	70%	28%	23%
Total consultation survey responses	1036	321	240	475
<b>Agree with selective licensing in Designation 3</b>	<b>48%</b>	11%	68%	65%
<b>Disagree with selective licensing in Designation 3</b>	<b>33%</b>	65%	23%	20%
Total consultation survey responses	1298	391	271	636
<b>Agree that the standard property conditions should apply to all designations</b>	<b>64%</b>	29%	80%	79%
<b>Disagree that the standard property conditions should apply to all designations</b>	<b>30%</b>	61%	17%	17%
Total consultation survey responses	1250	380	264	606
<b>Agree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 &amp; 2</b>	<b>59%</b>	24%	74%	75%
<b>Disagree that the Supplementary ASB and Poor Housing Conditions should be applied to designation 1 &amp; 2</b>	<b>32%</b>	63%	20%	18%
Total consultation survey responses	1307	393	273	641
<b>Agree that the proposed fee for selective licensing is reasonable</b>	<b>44%</b>	7%	47%	50%
<b>Disagree that the proposed fee for selective licensing is reasonable</b>	<b>47%</b>	90%	36%	40%
Total consultation survey responses	1293	387	273	633
<b>Agree that the proposed discounts for selective licensing are reasonable?</b>	<b>37%</b>	13%	46%	47%
<b>Disagree that the proposed discounts for selective licensing are reasonable?</b>	<b>47%</b>	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

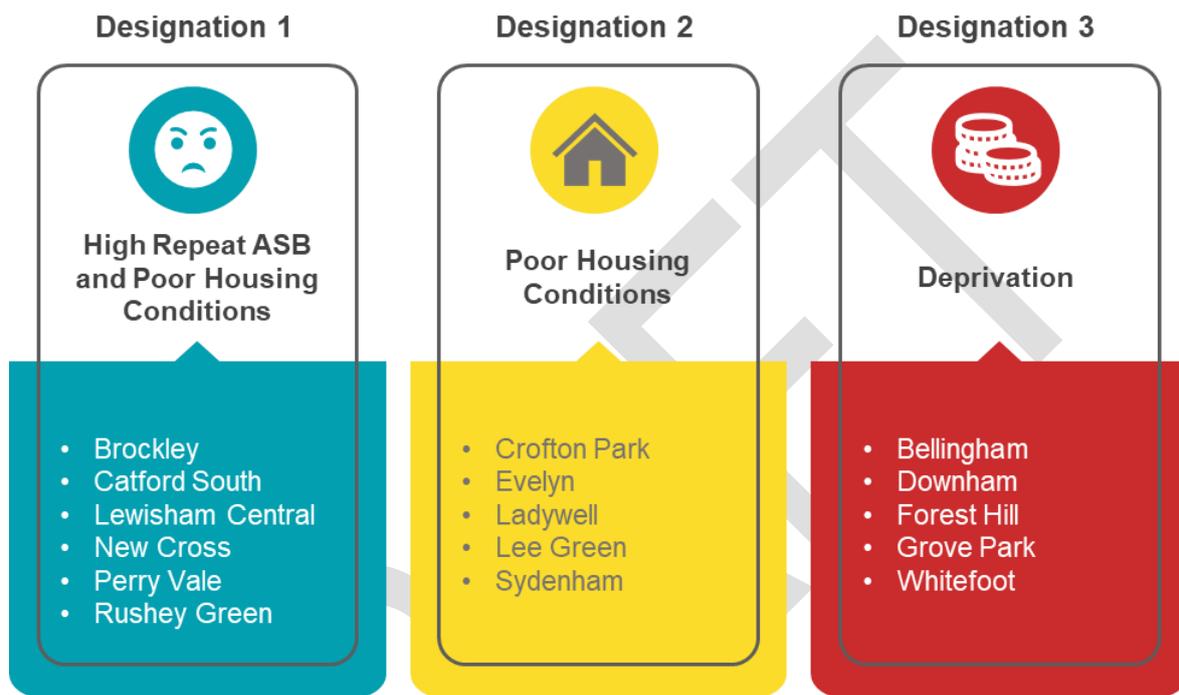
Legislation dictates that a selective licensing scheme can only be applied to areas containing a proportion of properties in the PRS **exceeding the national average of 19%**. The PRS in Lewisham is distributed across all 18 wards: where the percentage of PRS properties in each ward ranges from between 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 12<sup>th</sup> November 2021 to 3<sup>rd</sup> February 2022 including:
  - LB Lewisham licencing 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 Licencing website that promoted the licencing consultation exercise were viewed 6,930 times and the LB Lewisham was the third most viewed borough page.
  - The licencing 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 licencing 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 licencing 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 17<sup>th</sup> Jan, 25<sup>th</sup> Jan, 1<sup>st</sup> Feb, 7<sup>th</sup> Feb, 11<sup>th</sup> Feb, 14<sup>th</sup> Feb, 17<sup>th</sup> Feb, 23<sup>rd</sup> Feb, 7<sup>th</sup> Mar, 13<sup>th</sup> Mar, 9<sup>th</sup> May, 12<sup>th</sup> May
- Facebook posts on 17<sup>th</sup> Jan, 25<sup>th</sup> Jan, 1<sup>st</sup> Feb, 11<sup>th</sup> Feb, 14<sup>th</sup> Feb, 17<sup>th</sup> Feb, 23<sup>rd</sup> Feb, 7<sup>th</sup> Mar, 13<sup>th</sup> Mar, 9<sup>th</sup> May, 12<sup>th</sup> May
- Instagram posts on 25<sup>th</sup> Jan, 1<sup>st</sup> Feb, 7<sup>th</sup> Feb, 23<sup>rd</sup> Feb (Instagram reel)
- Next door posts on 15<sup>th</sup> 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 9<sup>th</sup> May to 20<sup>th</sup> 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 20<sup>th</sup> October 2021 to 13<sup>th</sup> 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 14<sup>th</sup> January on Commonplace, and was moved to the Council’s website on 21<sup>st</sup> January 2022. The consultation was extended to 20<sup>th</sup> 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 2<sup>nd</sup> March 2022 and was attended by 18 people. The second meeting was held on 16<sup>th</sup> 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**

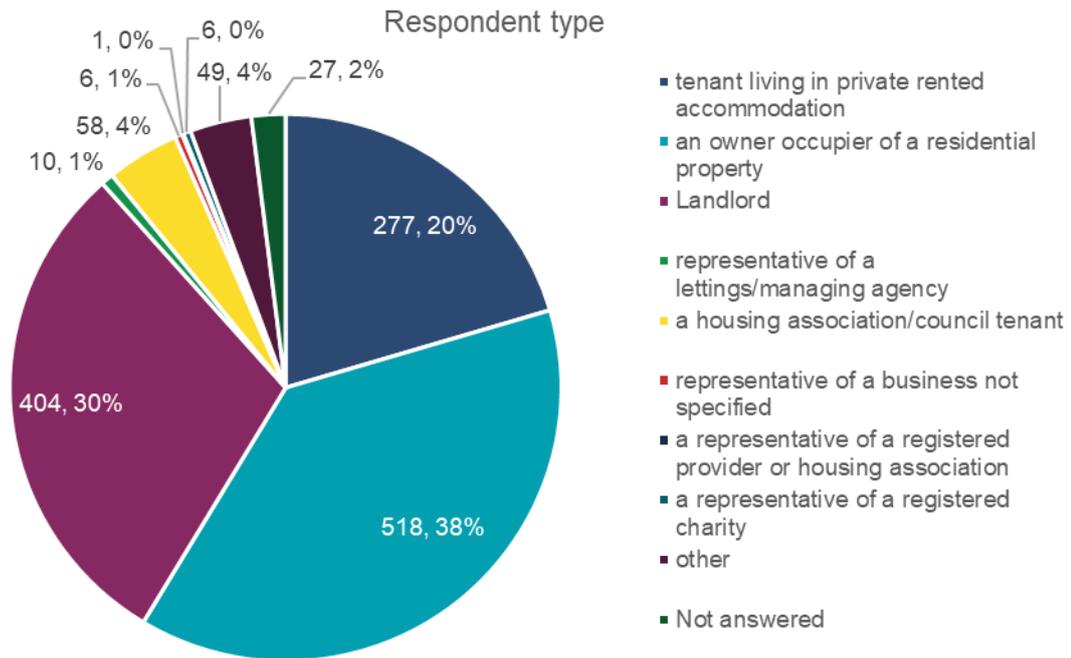
### **The online surveys**

This section of the report presents the results of the surveys which ran from 20<sup>th</sup> October 2021 to 20<sup>th</sup> 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.

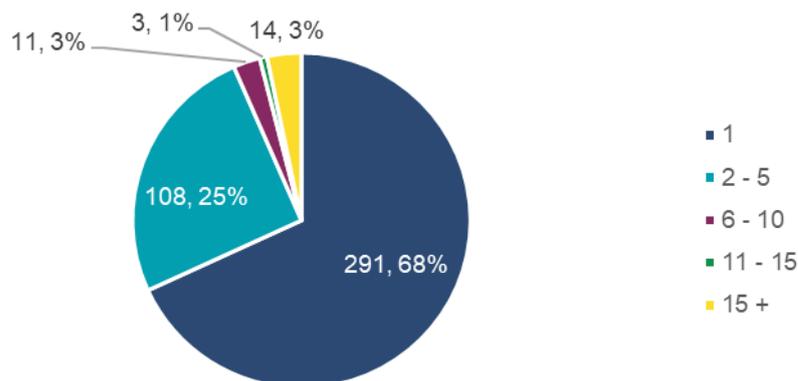
### **Respondents**

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

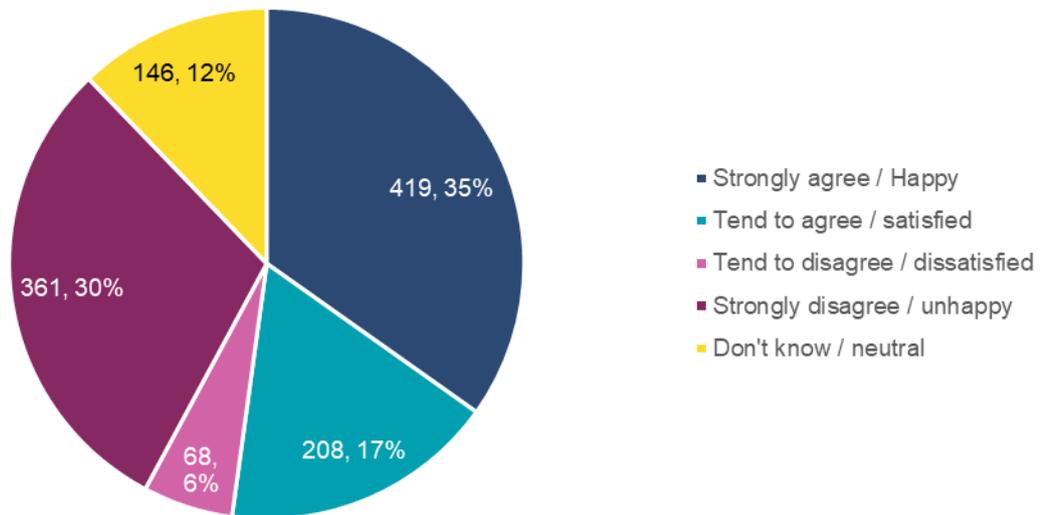
The Council is proposing to introduce a selective licensing scheme which would target privately rented homes in 16 wards let to single family households, two sharers or one person. These would be in three designations, as outlined in the Executive Summary.

#### *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.

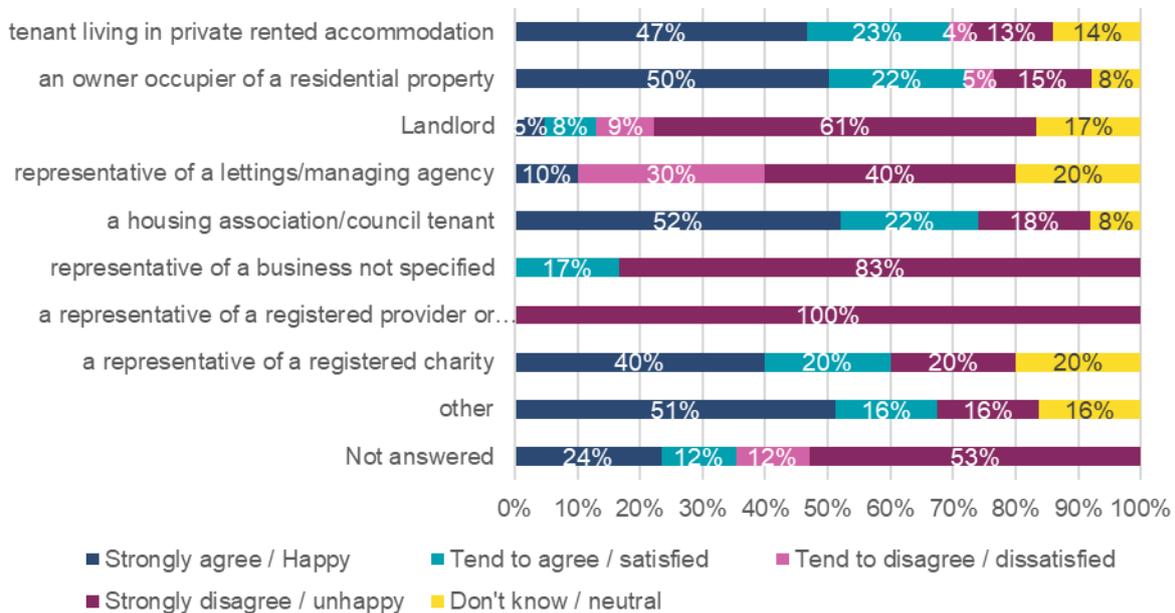
1,202 respondents answered the question regarding their agreement with the proposed scheme for designation 1. The overall majority, 52% (627) agree with the proposed scheme designation. 36% (429) disagree.

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



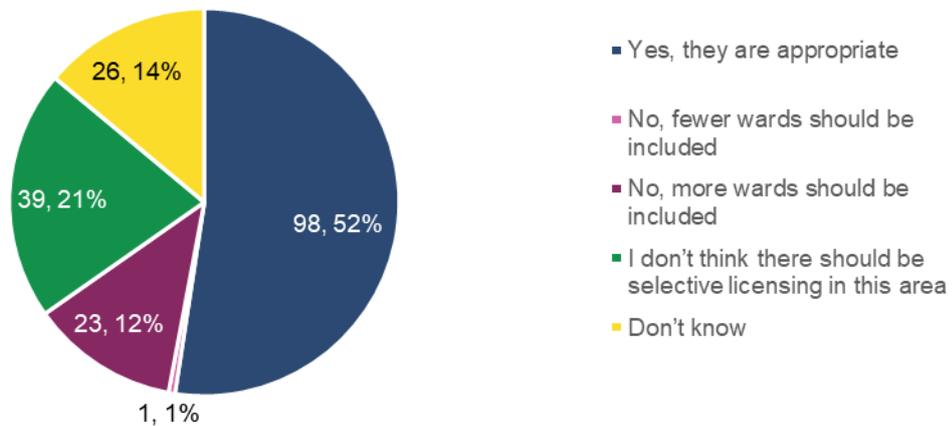
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with around 70% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with around 70% disagreeing

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



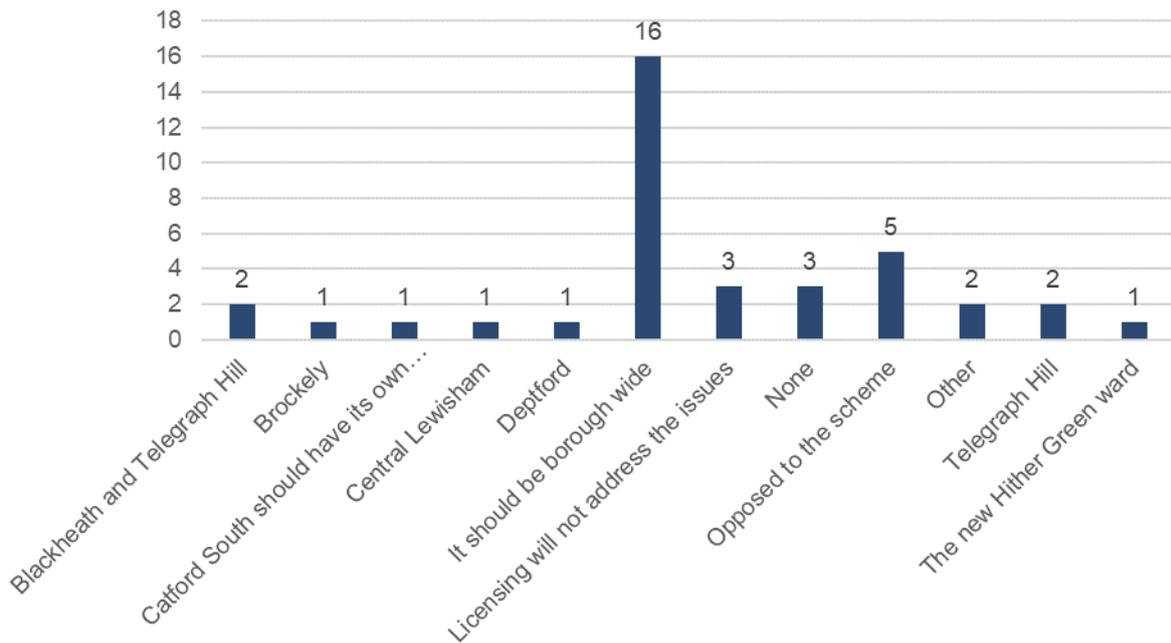
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 187 respondents answered this question for designation 1. 52% (98) responded that “yes, they are appropriate”.

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?

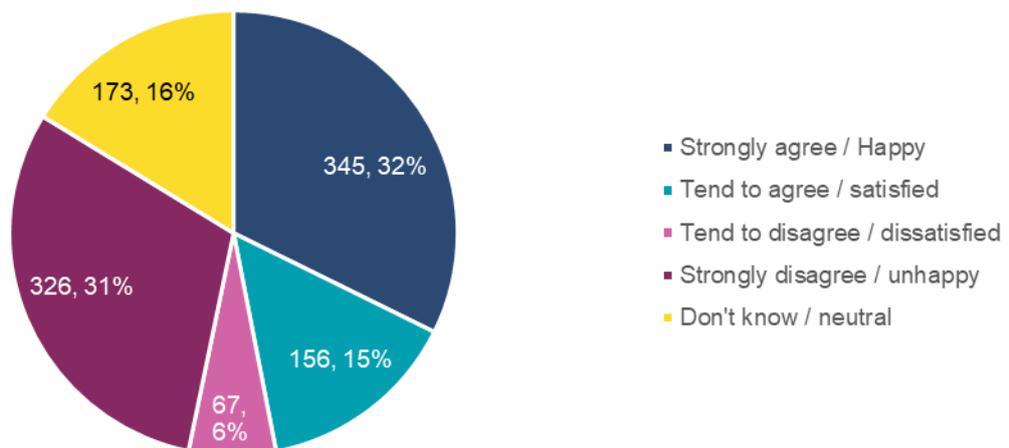


*Proposal to introduce selective licensing in designation 2.*

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

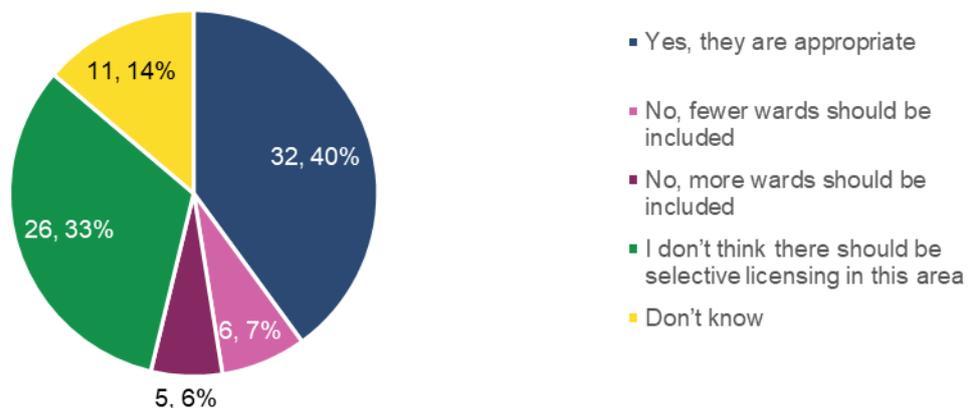
agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with around 60% disagreeing

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



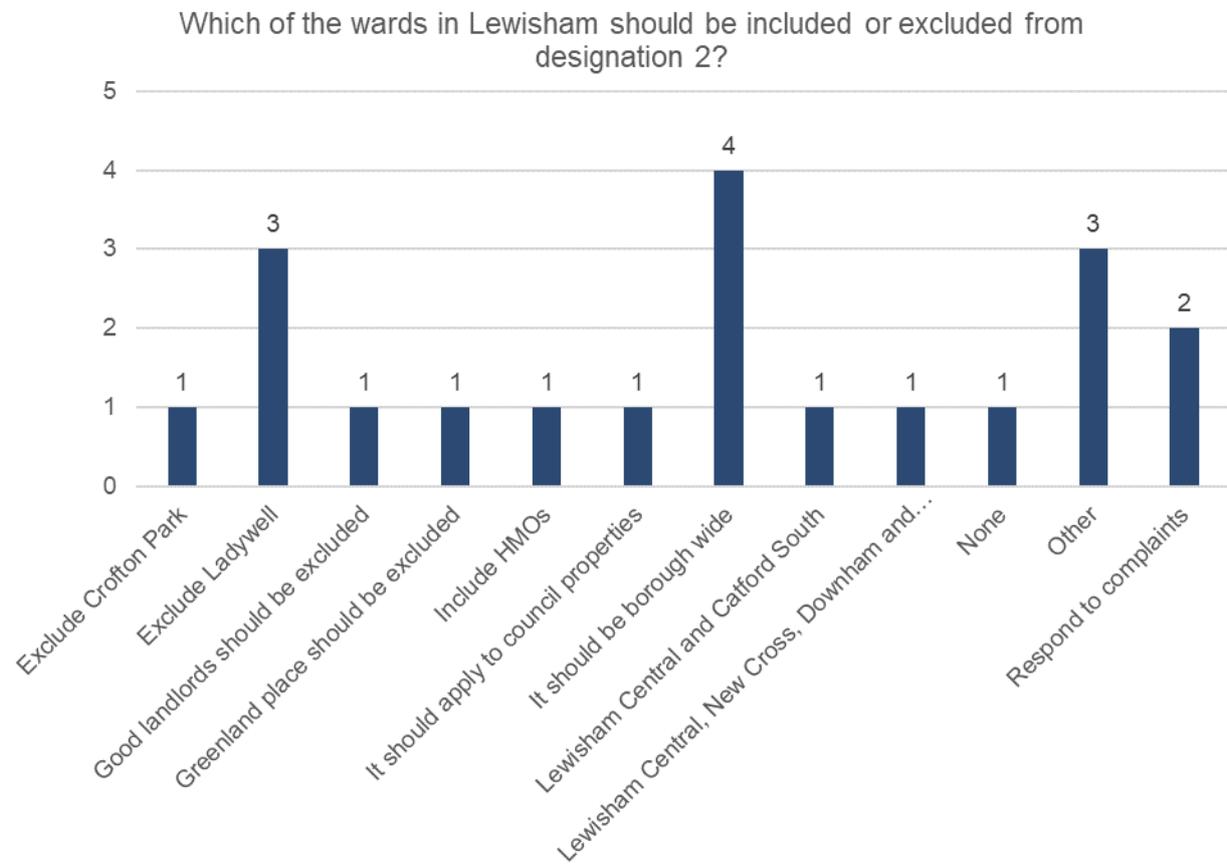
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 80 respondents answered this question for designation 2. 40% (32) responded that “yes, they are appropriate”.

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.

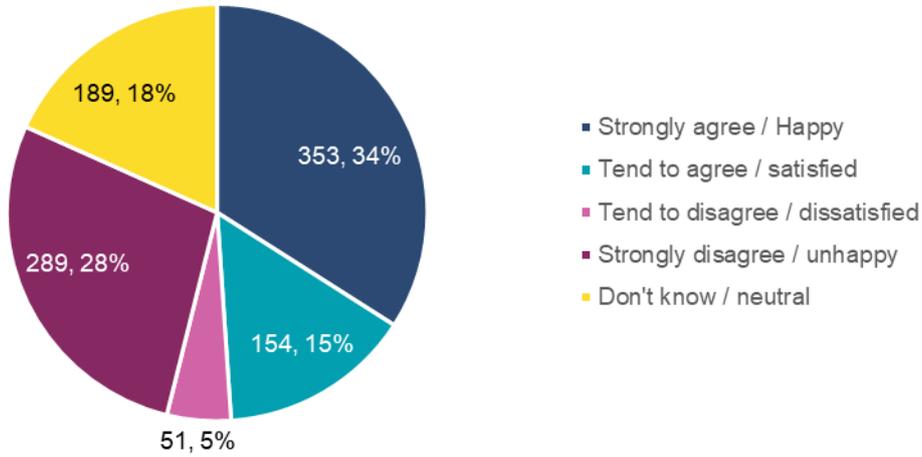


*Proposal to introduce selective licensing in designation 3.*

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

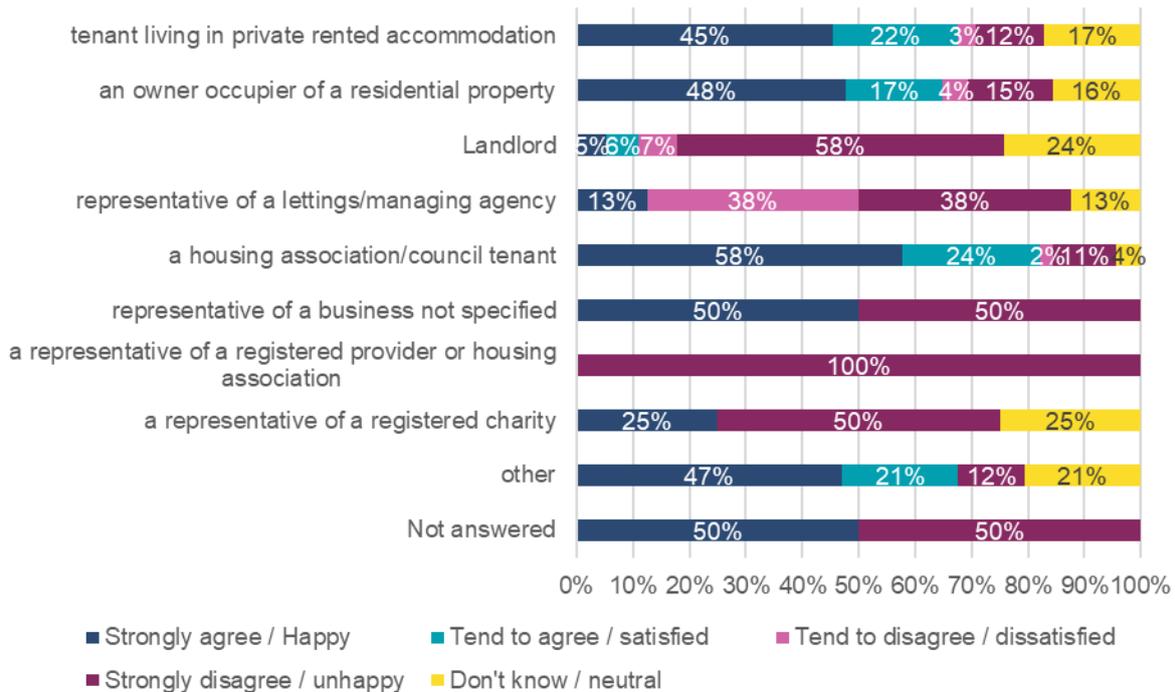
1,036 respondents answered the question regarding their agreement with the proposed scheme for designation 3. 49% (507) agree with the proposed scheme designation. 33% (340) disagree.

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



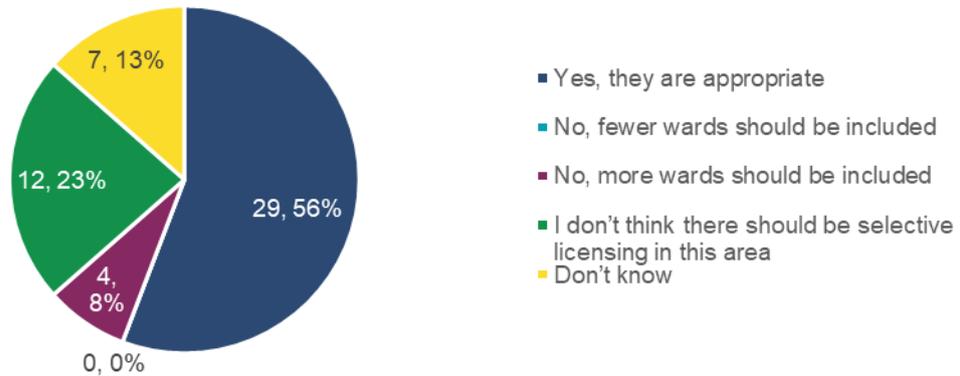
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposals with over 60% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 60% disagreeing

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



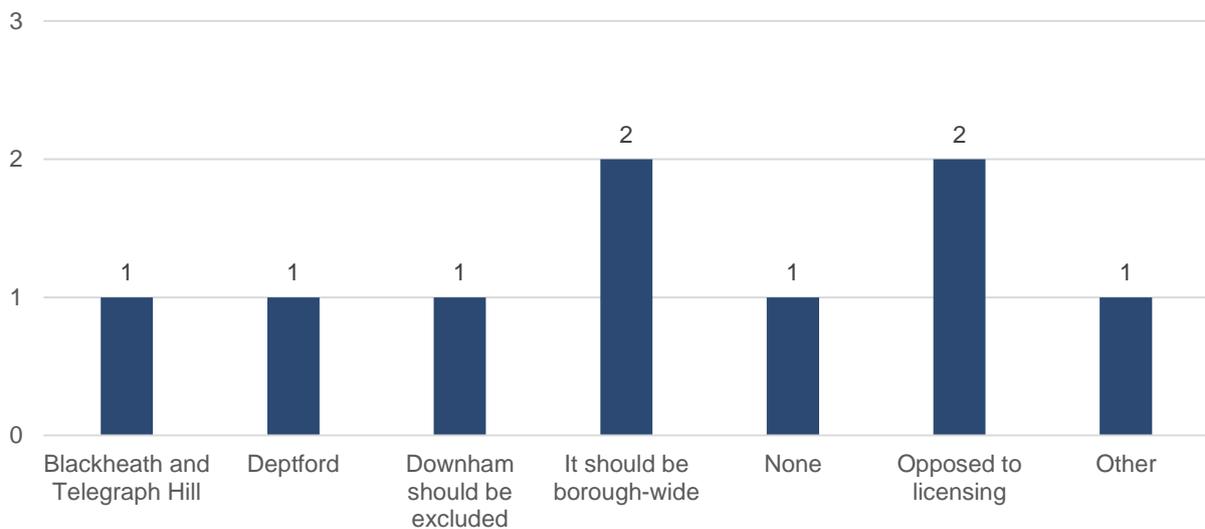
Respondents to the initial surveys (one for each designation) were asked if they thought the proposed wards for the designation were appropriate. 52 respondents answered this question for designation 3. 56% (29) responded that “yes, they are appropriate”.

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?



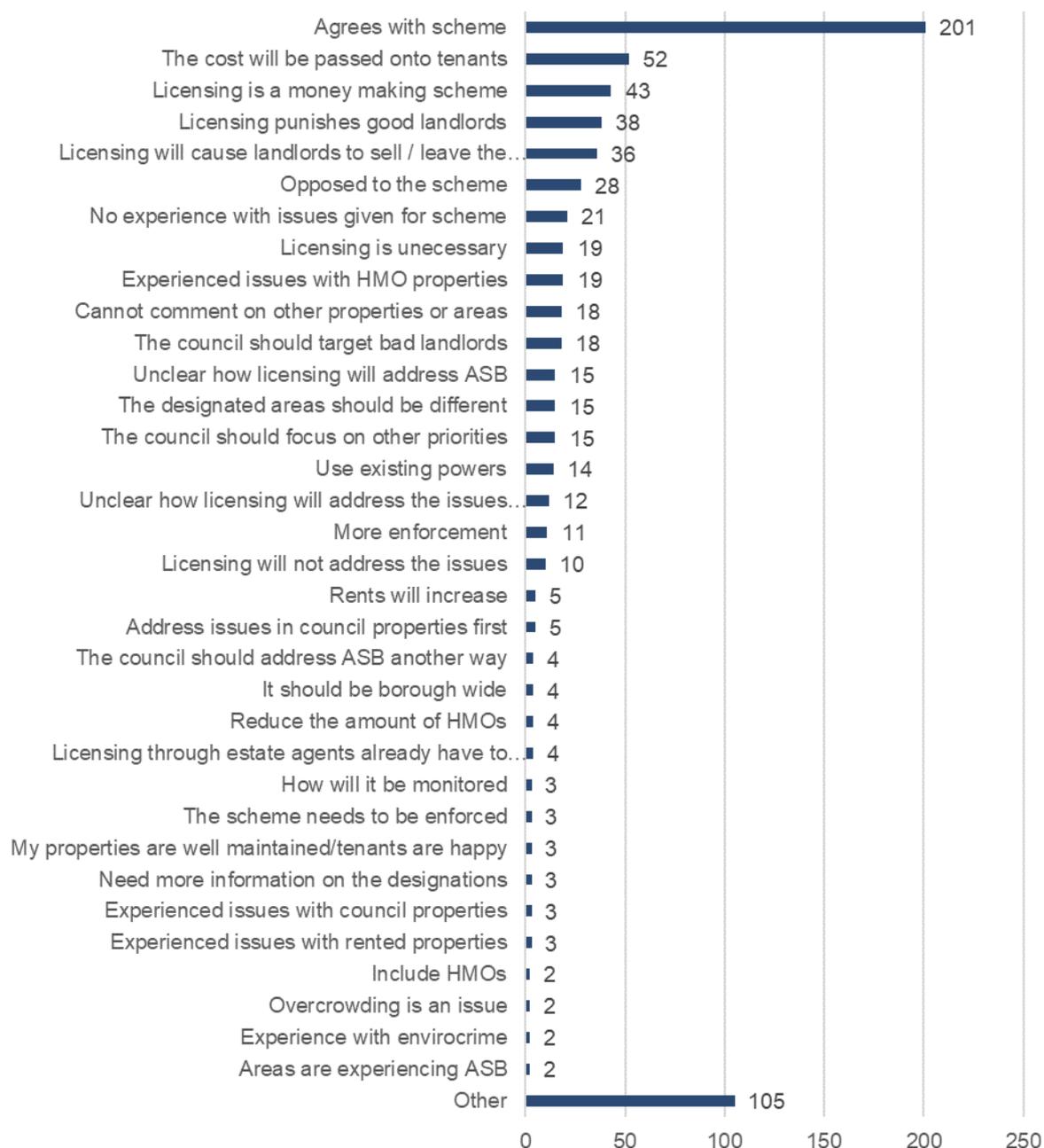
*Reasons for opposing or supporting the introduction of selective licensing schemes.*

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.

Agreement/Disagreement with scheme theme

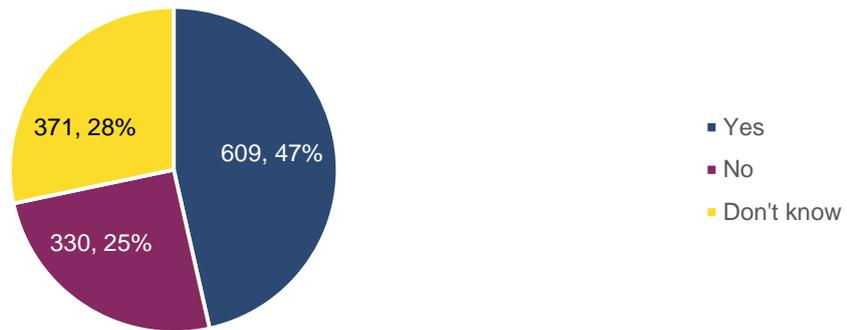


### Views on alternatives to licensing

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.

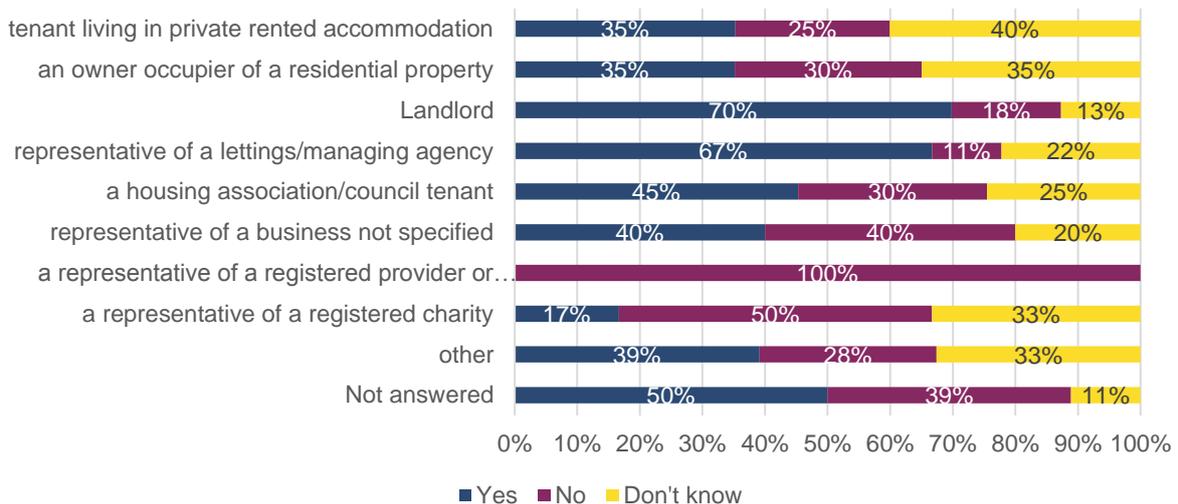
1,310 respondents answered this question. 47% (609) respondents answered yes, the council should consider alternatives. 25% (330) answered no, and 28% (371) answered “Don’t know”

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

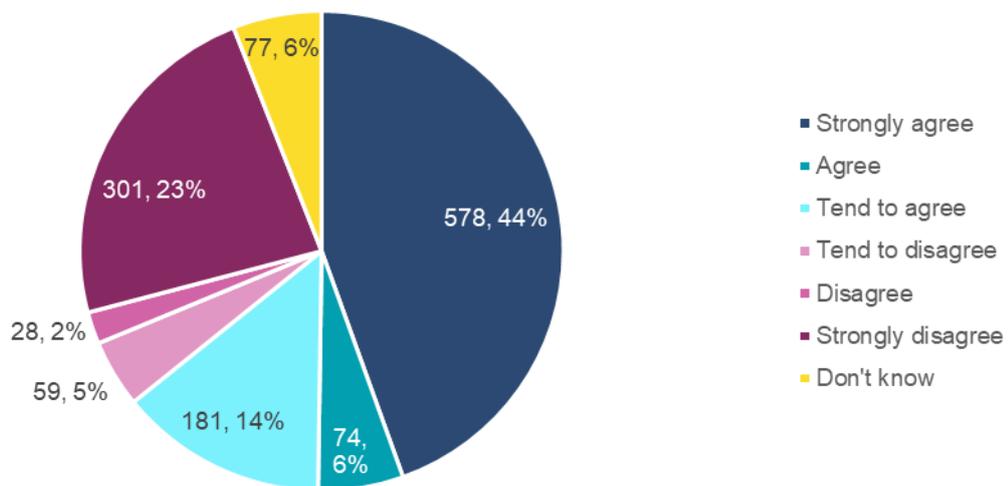
management including anti-social behaviour, repairs, and refuse management. Further information about the licence conditions was provided within the consultation documents.

*Views on the standard property conditions*

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

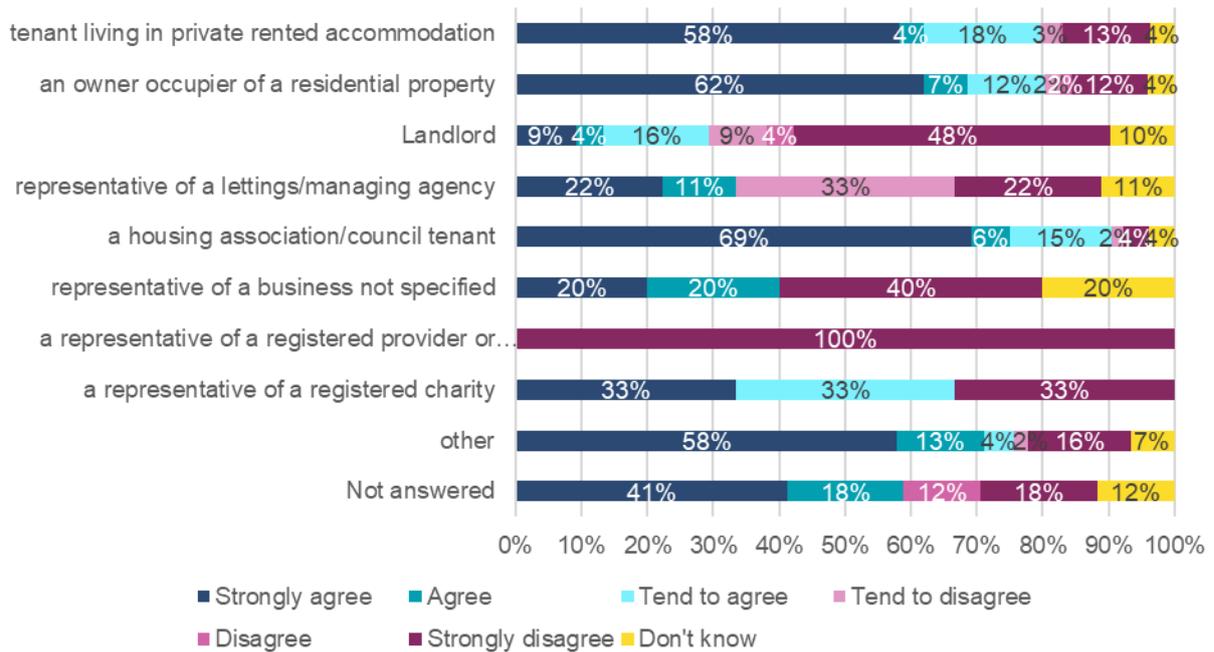
1,298 respondents answered the question regarding their agreement with the standard property conditions being applied to the designations. 64% (833) of respondents agreed and 30% (388) disagreed.

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?

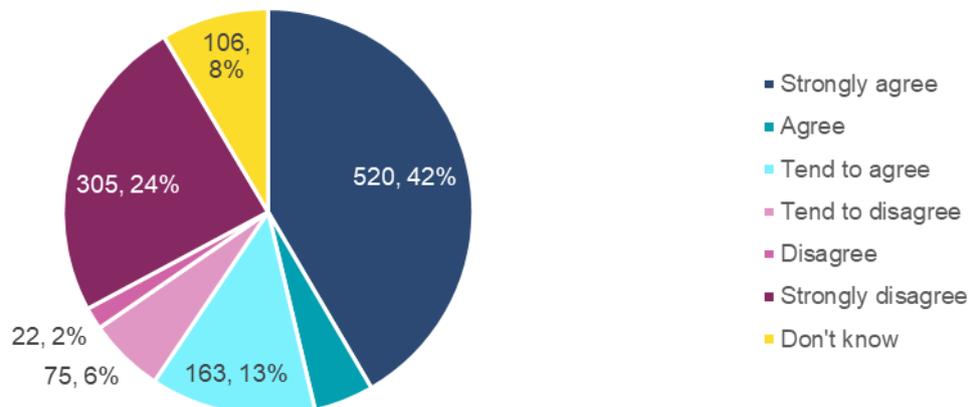


Views on the supplementary anti-social behaviour (ASB) and poor housing conditions

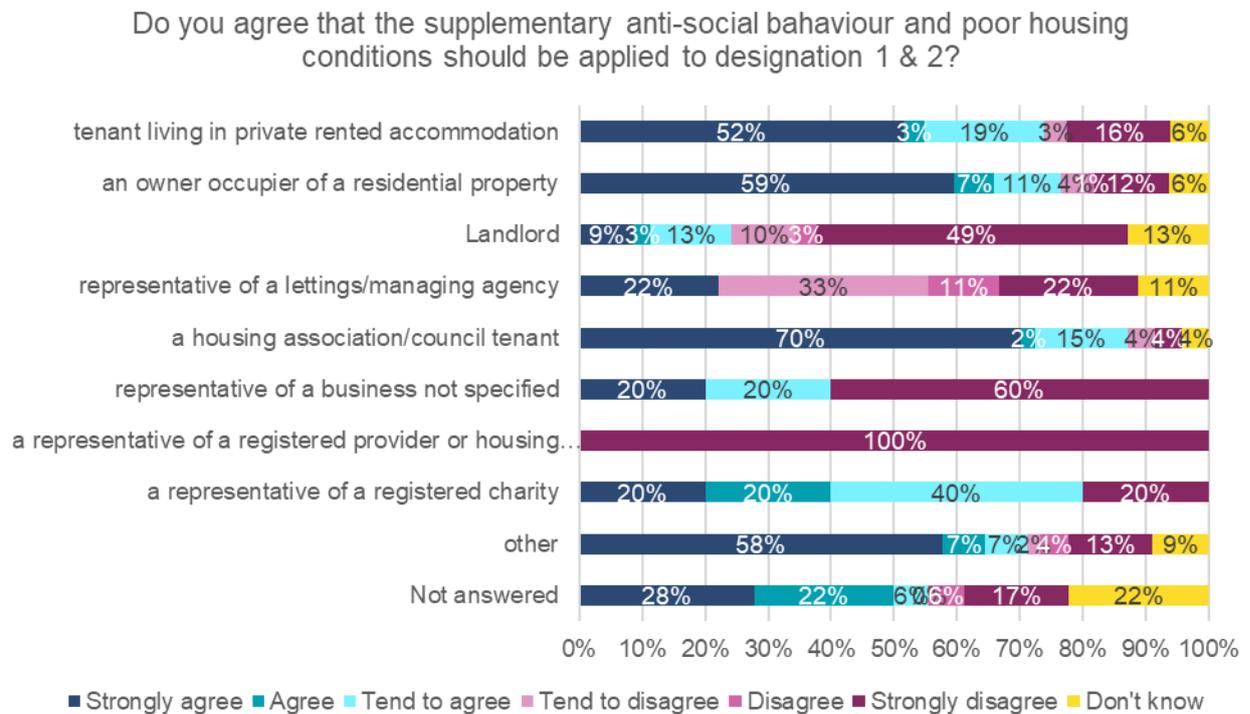
The Council consulted on the proposal to apply a supplementary set of property conditions to address ASB and poor housing conditions to designations 1 and 2.

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

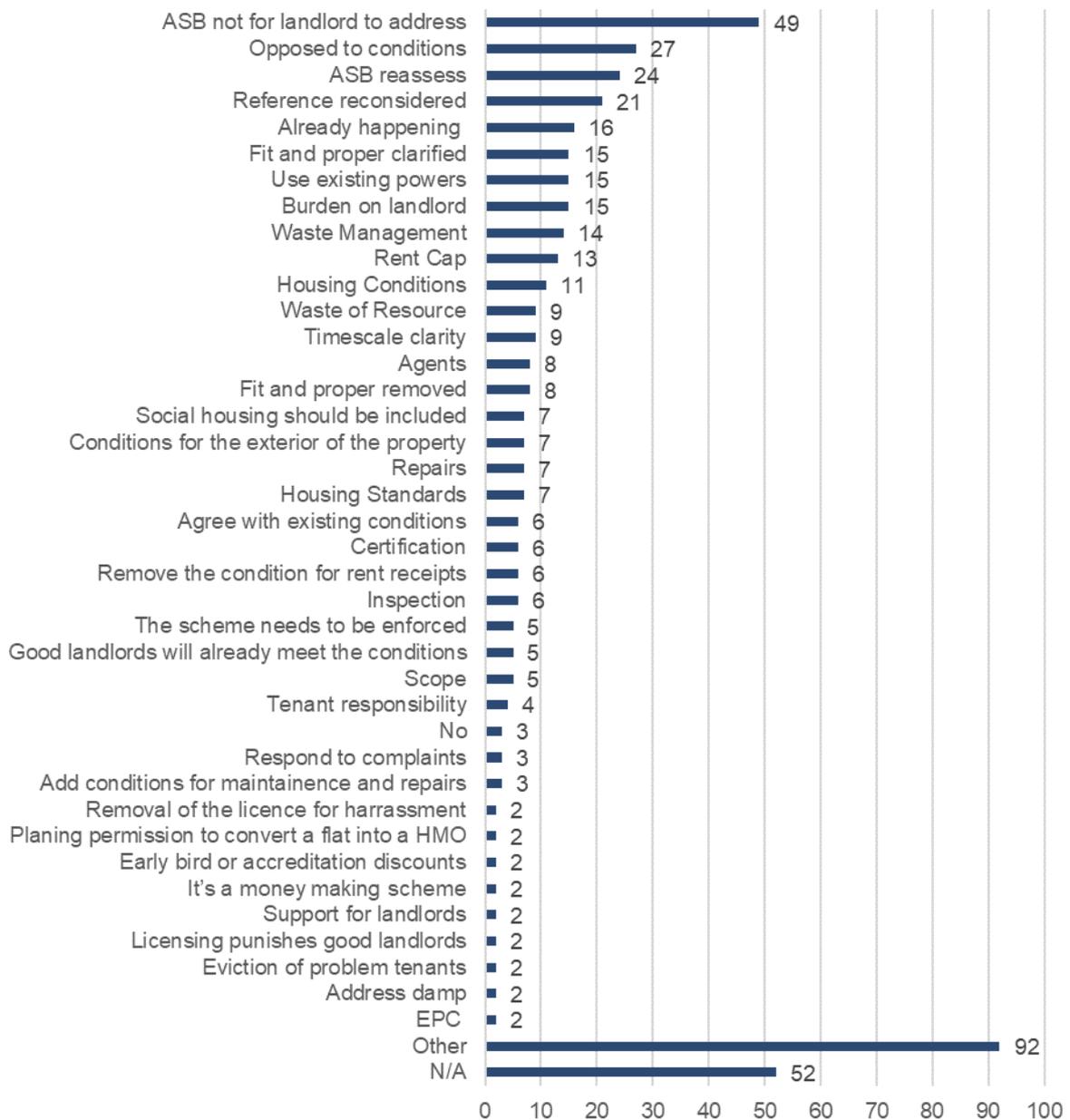


### Views on the proposed conditions

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

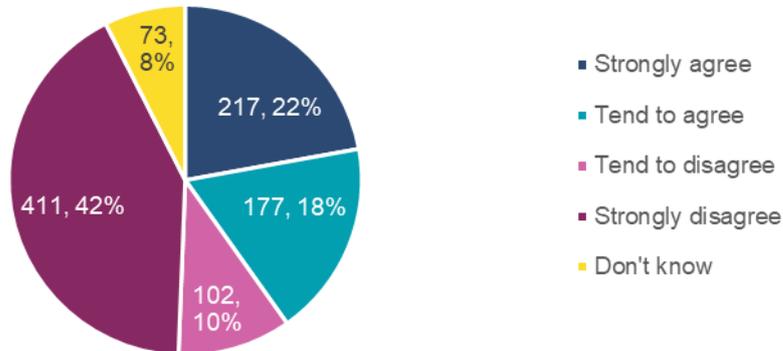
The consultation asked respondents for their views on the proposed licence fees for the proposed selective licensing scheme, and the proposed discounts. Information about the proposed licence fees and discounts was provided within the consultation documents. The questions regarding the fees and discounts 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.

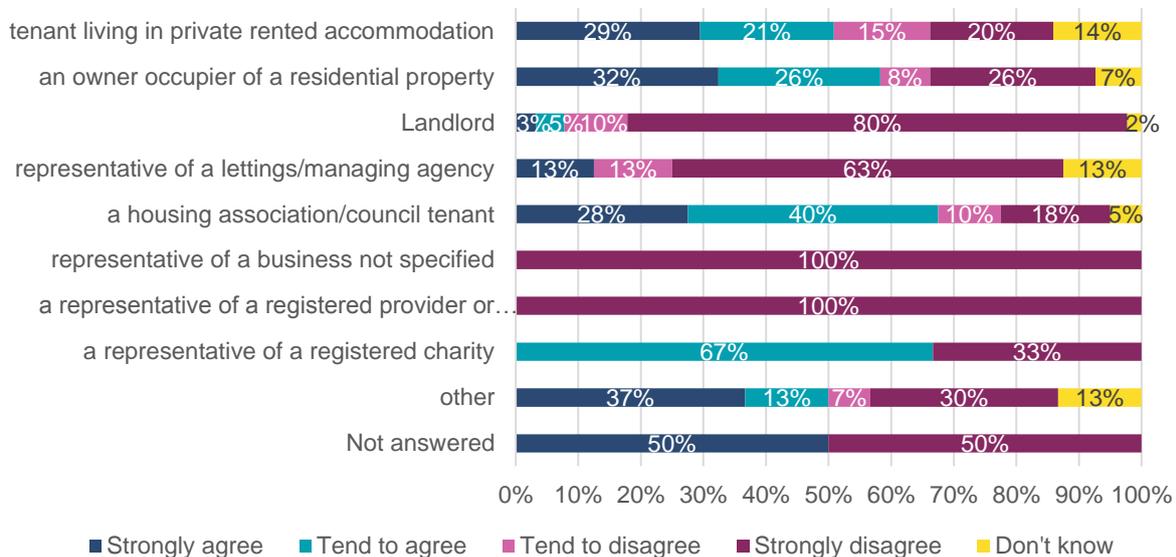
There were 980 responses to this question in the final, overall survey. 40% (394) agreed that the fee is reasonable, 52% (513) disagreed.

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



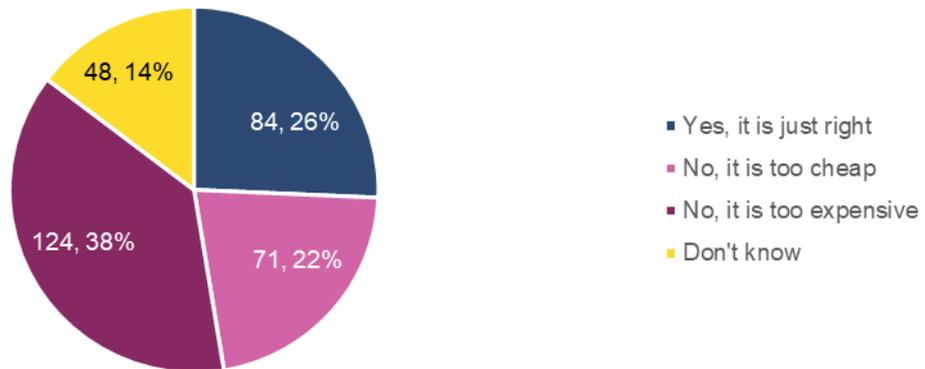
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants agree with the proposed fee, with around 60% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 75% disagreeing.

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



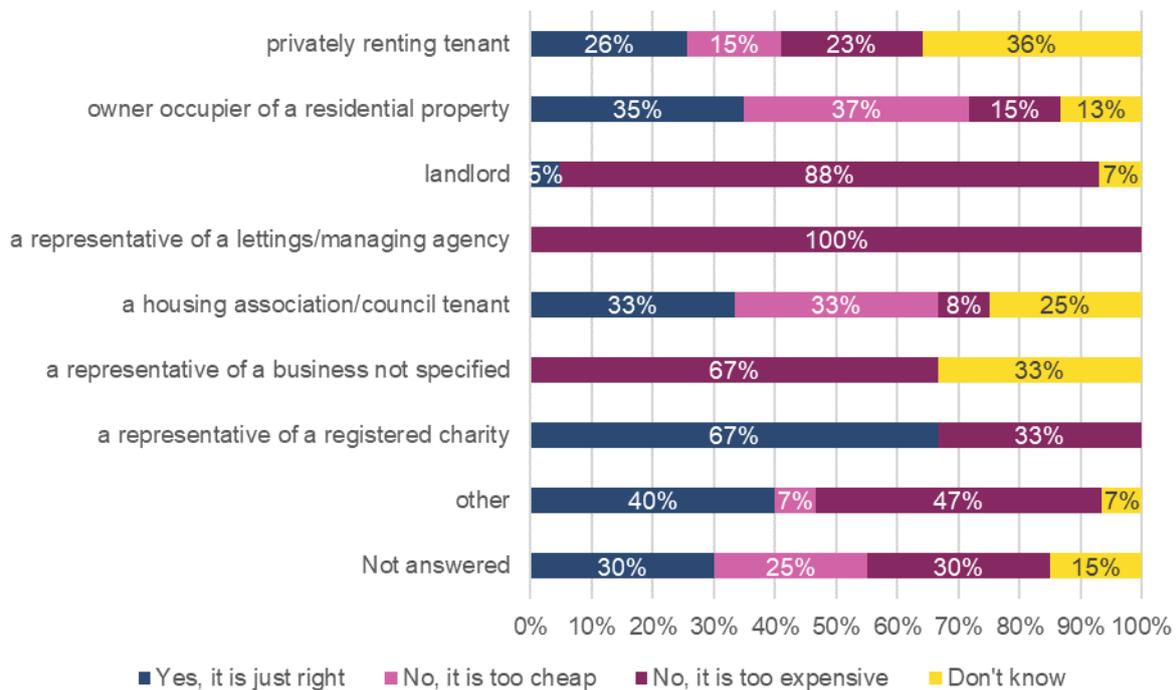
Respondents to the initial three surveys asked respondents if they thought the proposed fee for selective licensing is reasonable. There were 327 responses to this question. 38% (124) think that the fee is too expensive.

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?

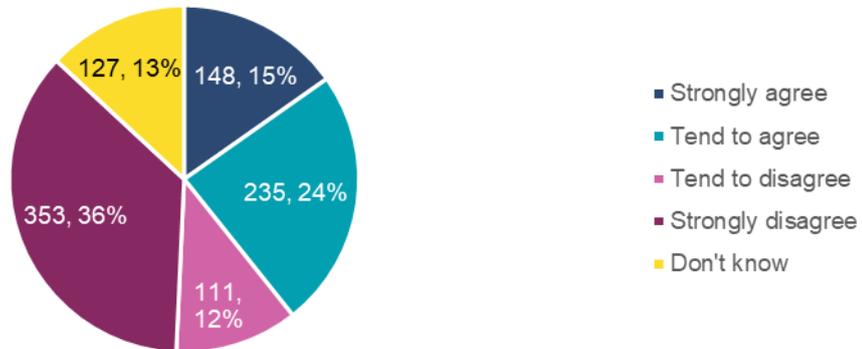


*Views on the proposed discounts*

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.

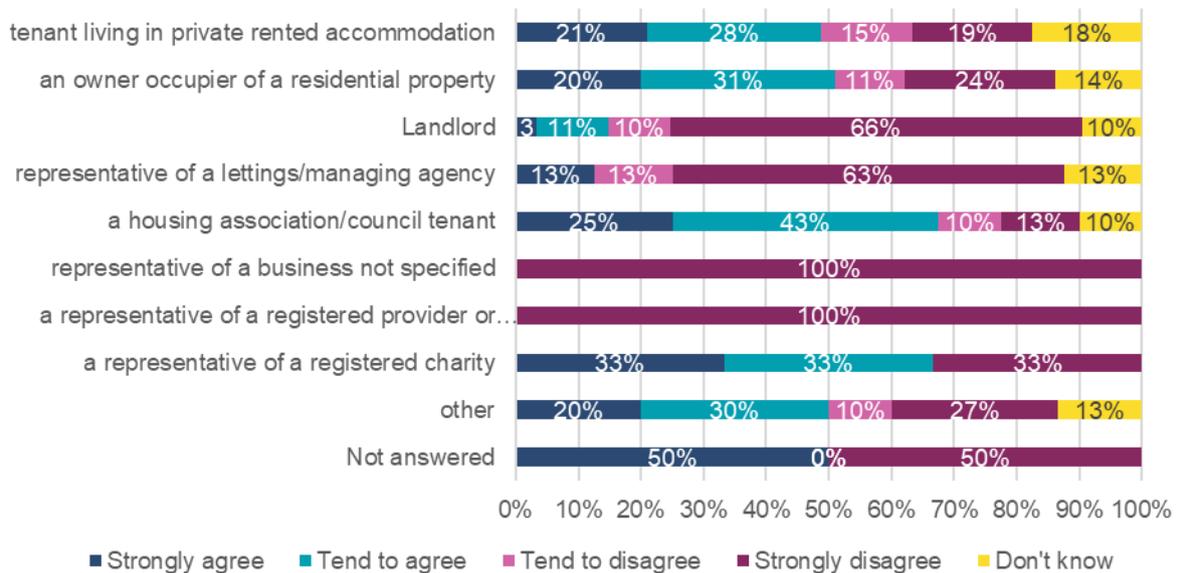
There were 974 responses to this question in the final, overall survey. 39% (383) agreed that the discounts were reasonable. 48% (464) disagreed with the discounts

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



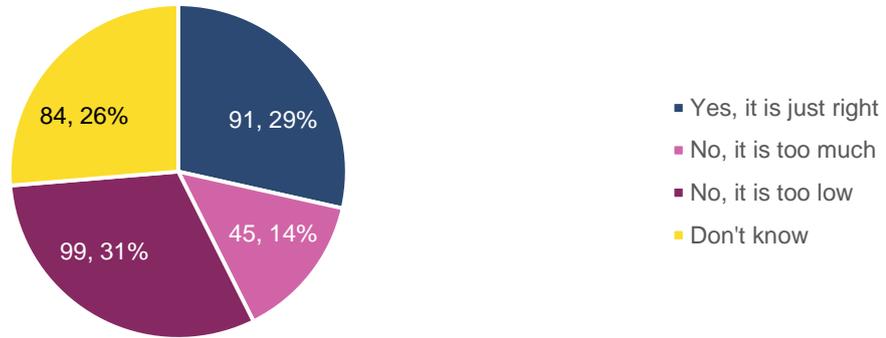
Looking at the responses by group, owner occupiers, privately renting tenants and housing association/council tenants are in favour of the proposed discounts with around 50% of each group agreeing. Landlords and representatives of letting/managing agents are opposed to the proposals with over 75% disagreeing.

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



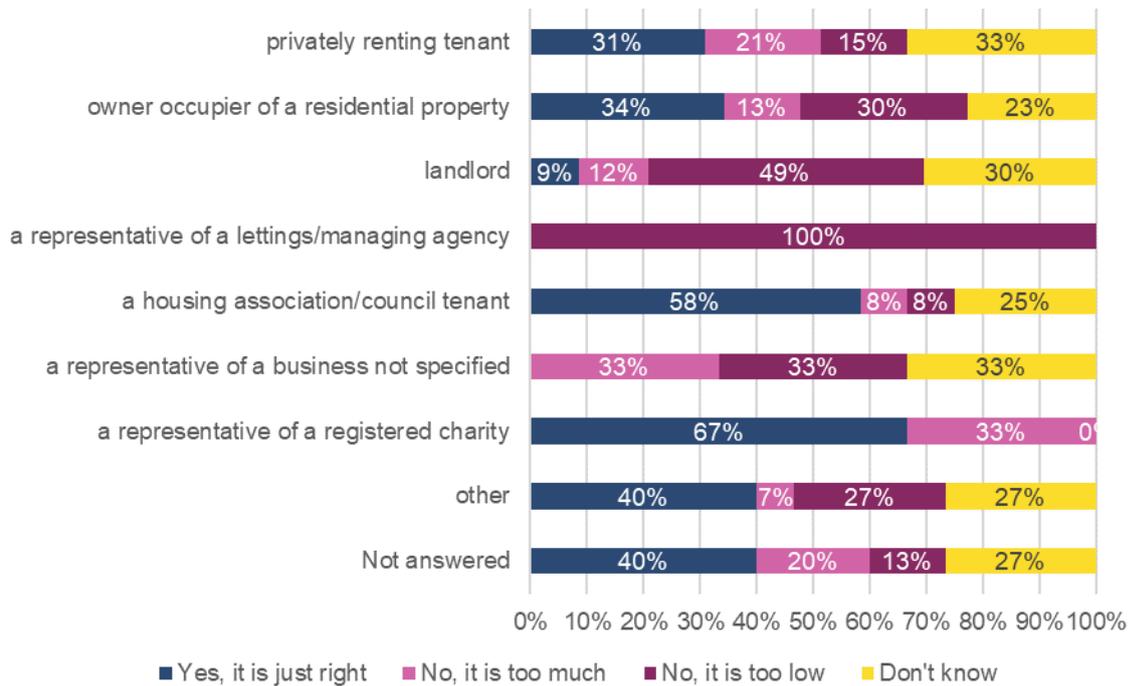
Respondents to the initial three surveys were asked how reasonable they thought the proposed discounts for selective licensing are. There were 319 responses to this question. 43% (136) think that the discounts are just right or too much.

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?

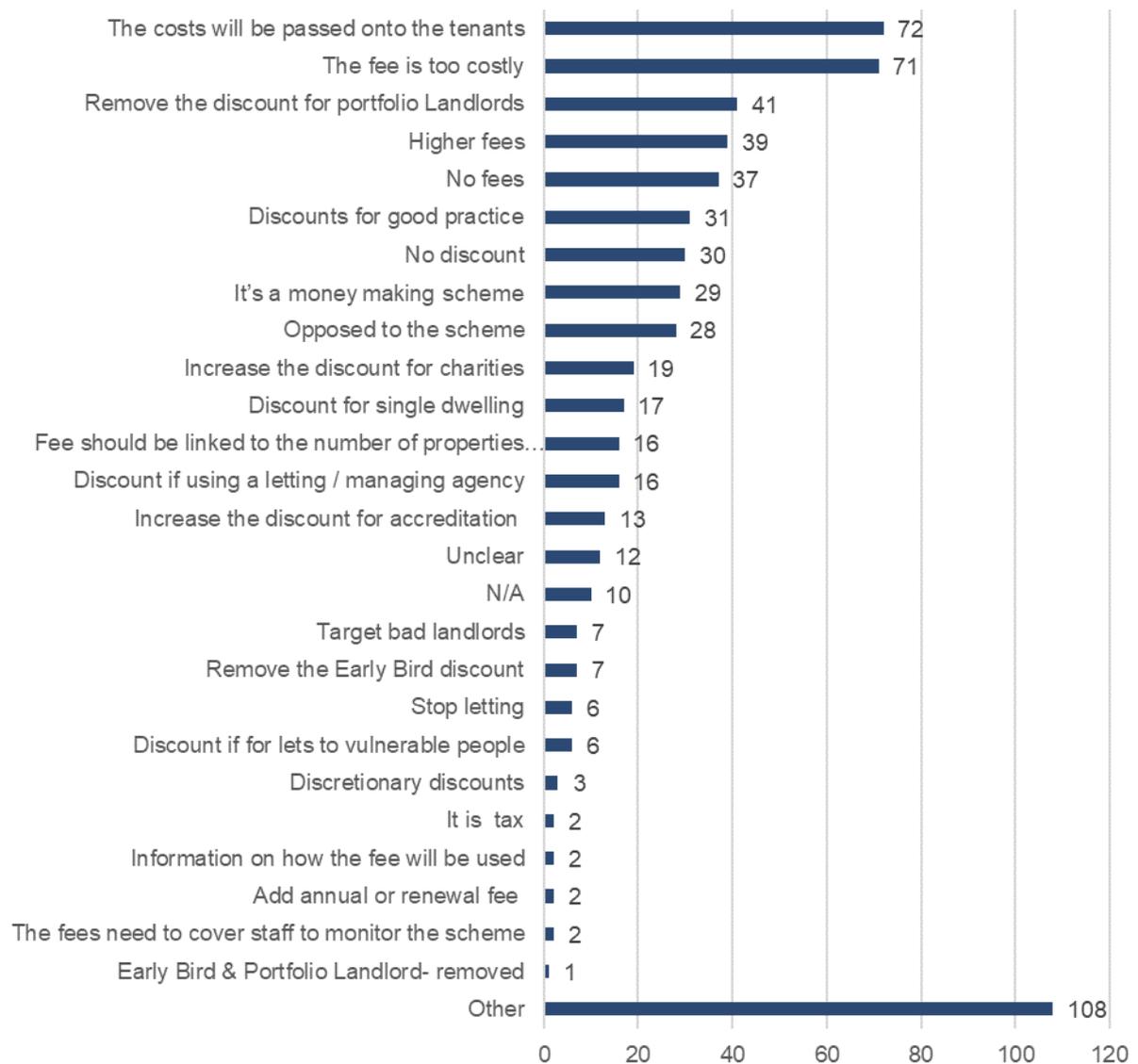


Respondents to all the surveys were asked if they thought any discounts should be removed, or any additional discounts should be considered. In total there were 627 comments from respondents, 255 from landlords, 103 from private tenants, 203 from owner occupiers and 66 from other respondent types. Themes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

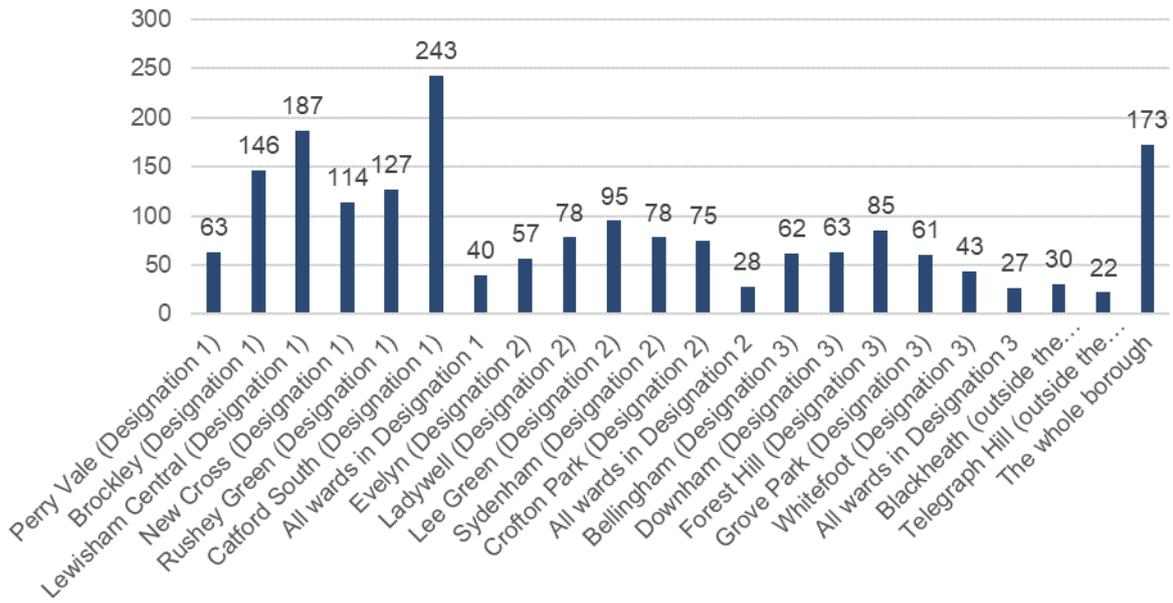
What would you change about the proposed fees and discounts?



Respondents' connections to Lewisham

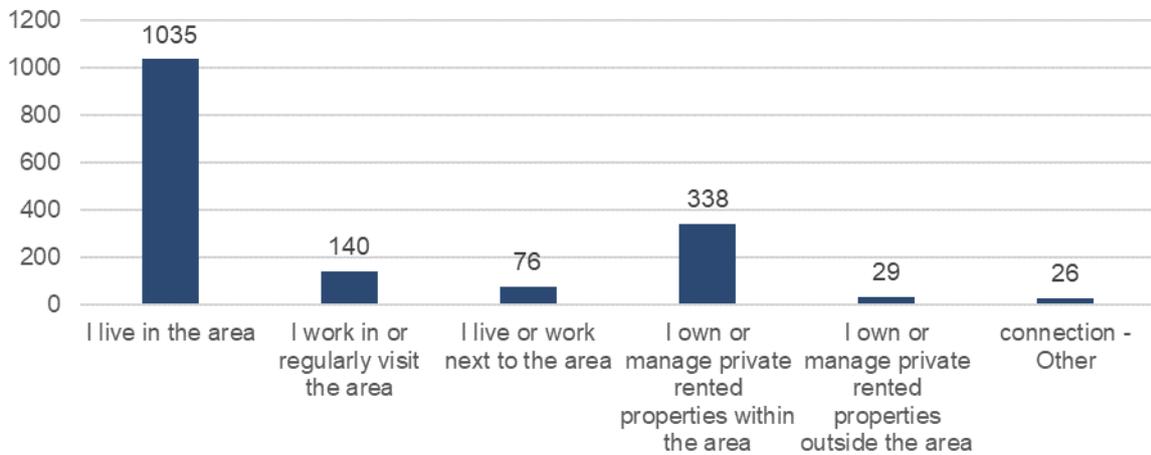
Respondents were asked to select which wards they were commenting on for the consultation. Respondents could select multiple answers. The area with the highest number of responses were "the whole borough" and Catford South (Designation 1).

Areas being commented on:

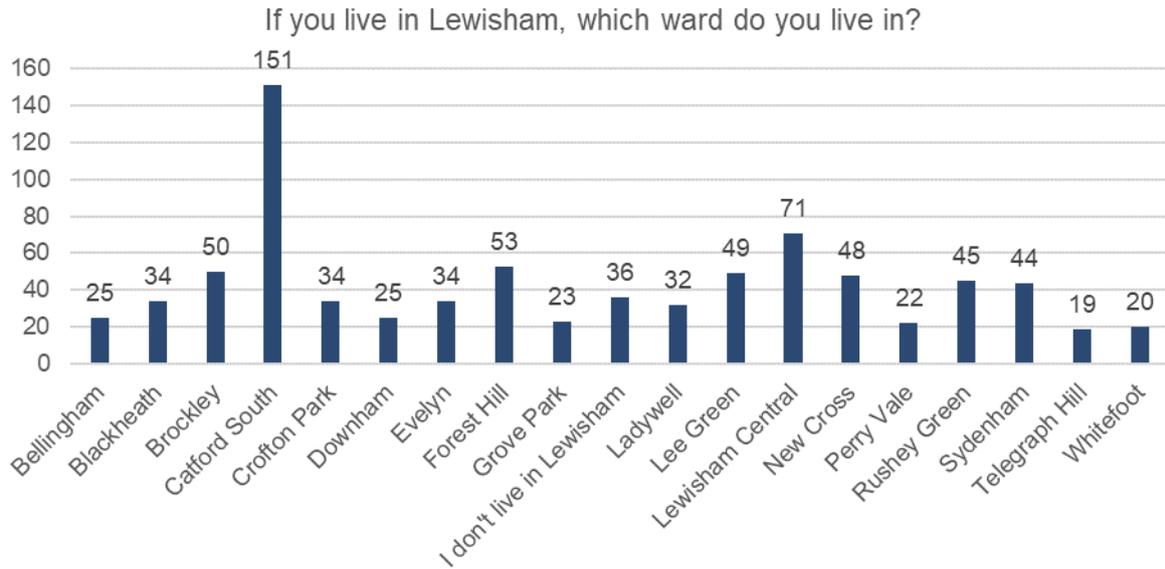


Respondents were asked what their connection was to the areas they were commenting on. Respondents could select multiple answers. The overall majority stated that they live in the area.

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.

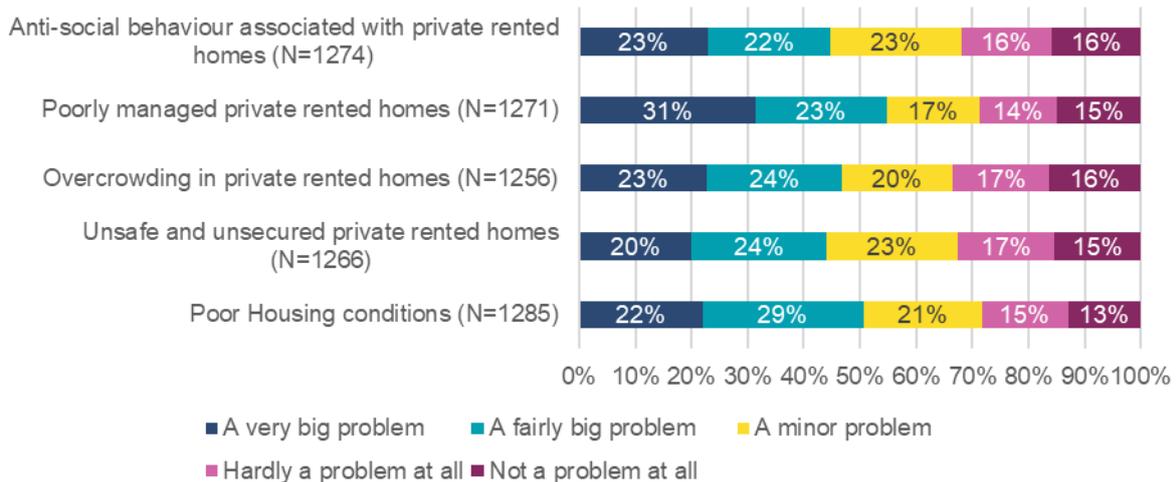


### Views on problems with privately rented homes for Lewisham

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=).

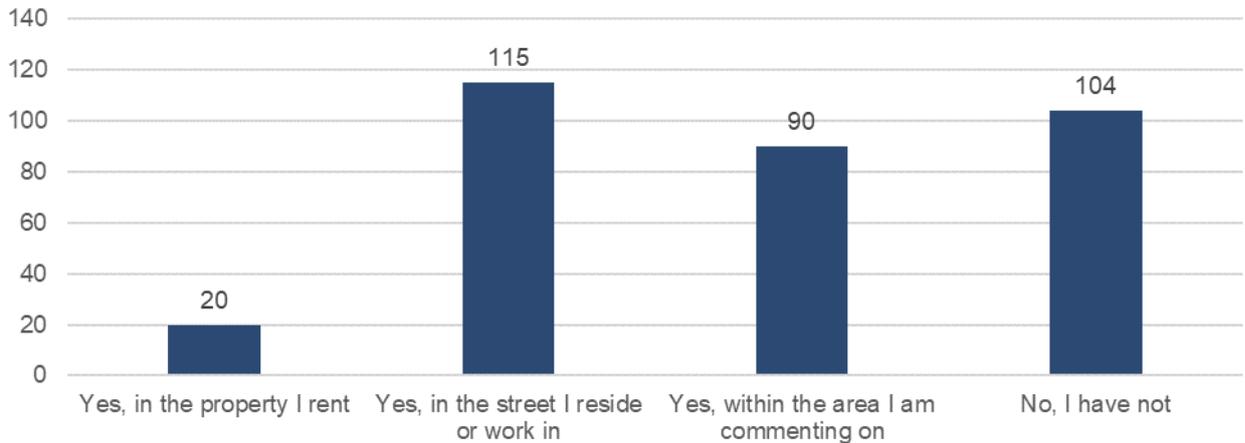
Over 40% of respondents thought that all the problems were either a very big problem or fairly big problem in privately rented homes.

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



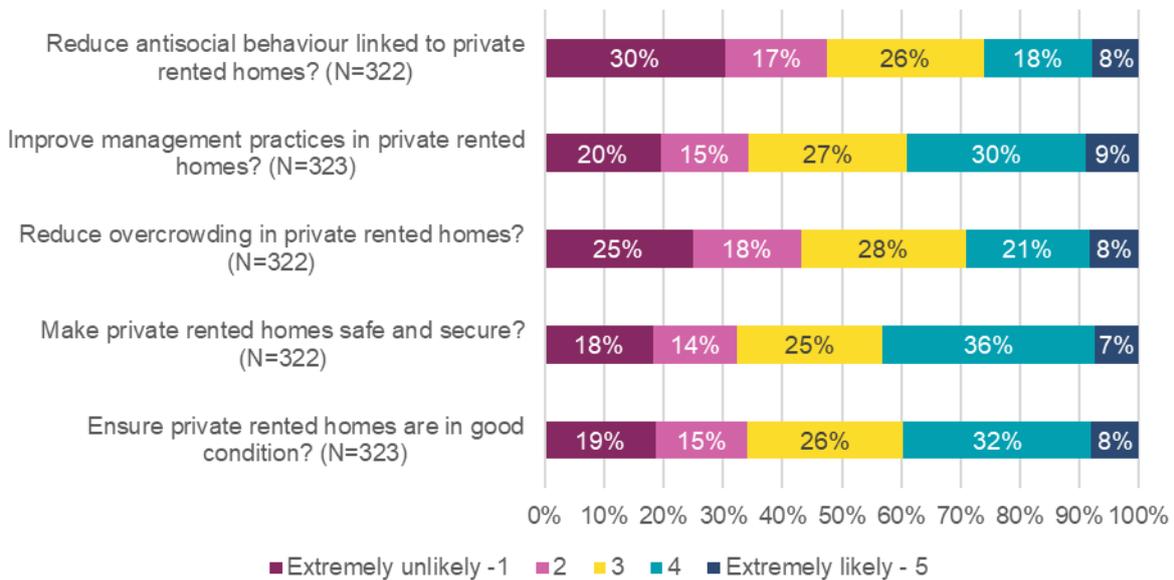
Respondents to the initial three surveys (one for each designation) were asked where they have experienced these sorts of issues in Lewisham.

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:

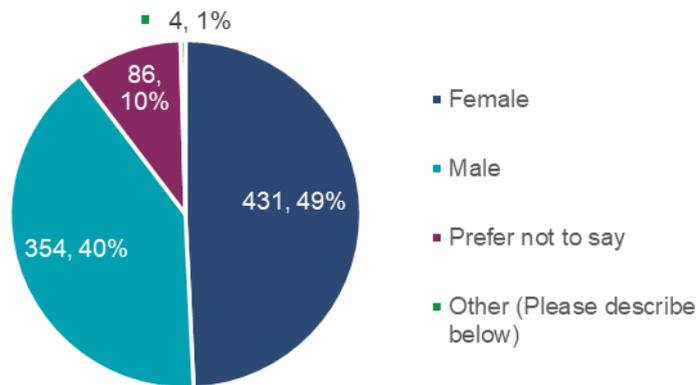


### The profile of respondents

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.

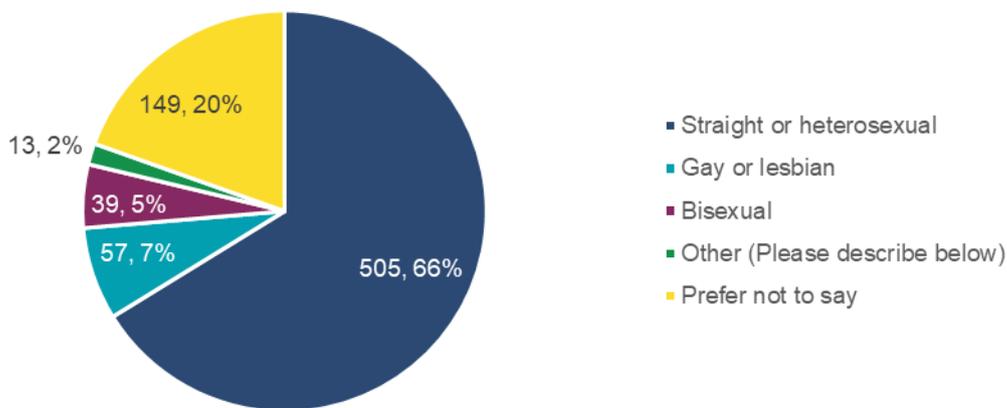
### What is your sex?



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.

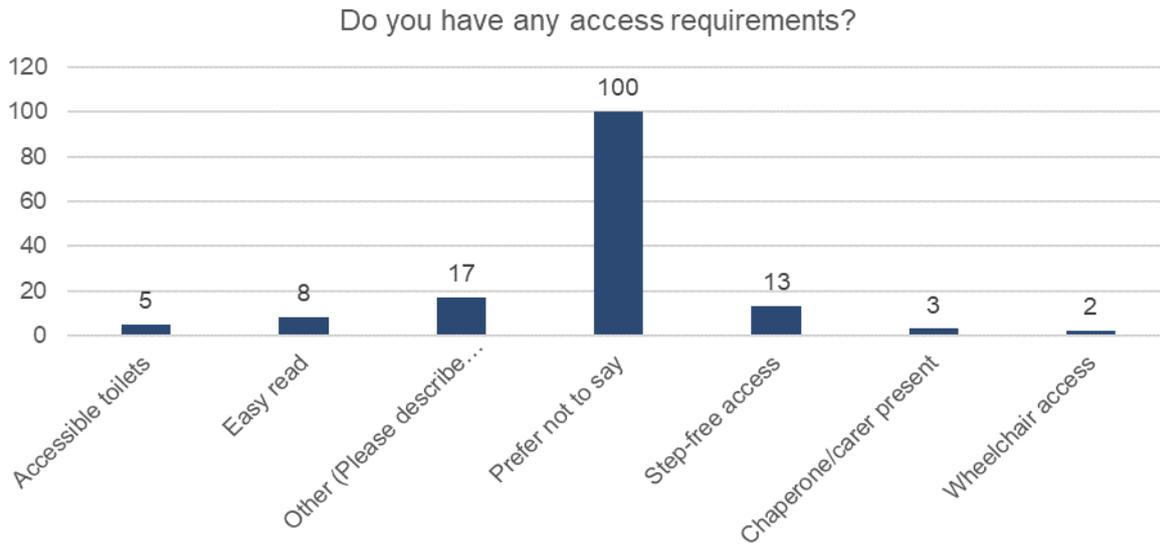
704 respondents answered the question "Is your gender identity different from the gender you were assigned at birth?". 82% of respondents said their "gender identity is the same", 17% answered they would prefer not to say and 1% said their gender identity is different.

### How would you define your sexual orientation?

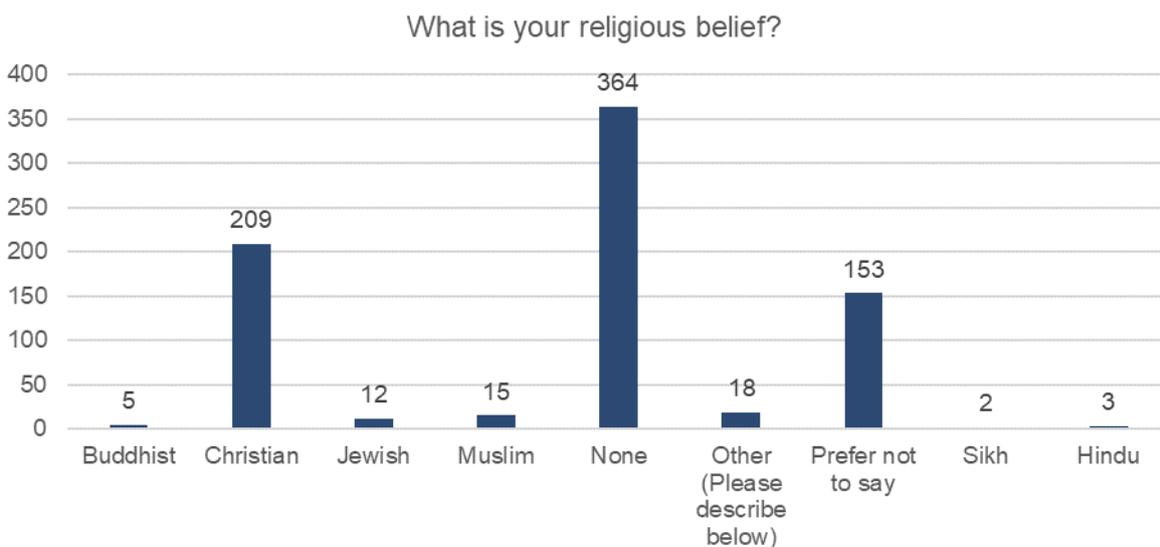


Respondents were asked if they consider themselves a disabled person and if they had any access requirements. 826 respondents answered the question "Do you consider yourself to be a disabled person?". 79% answered no, they did not consider themselves to be a disabled person. 9% answered that they prefer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



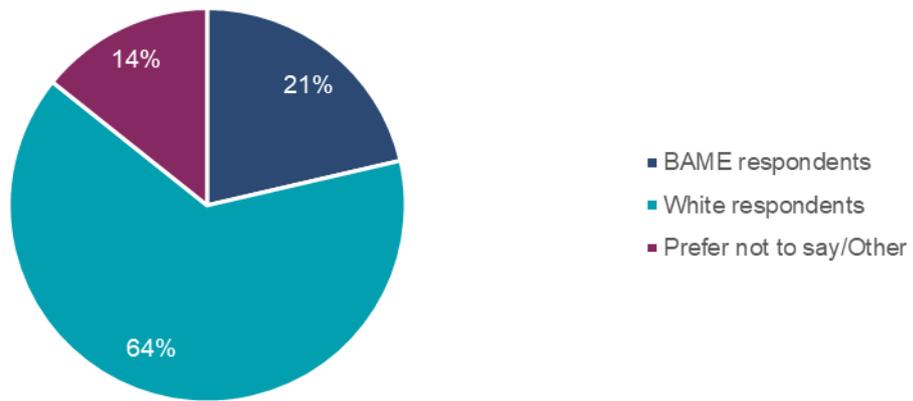
Respondents were also asked about their ethnicity, which was compared with borough’s ethnic composition (Source – GLA 2020). 964 respondents answered this question. The largest proportion of respondents identified themselves as “White – British”.

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.

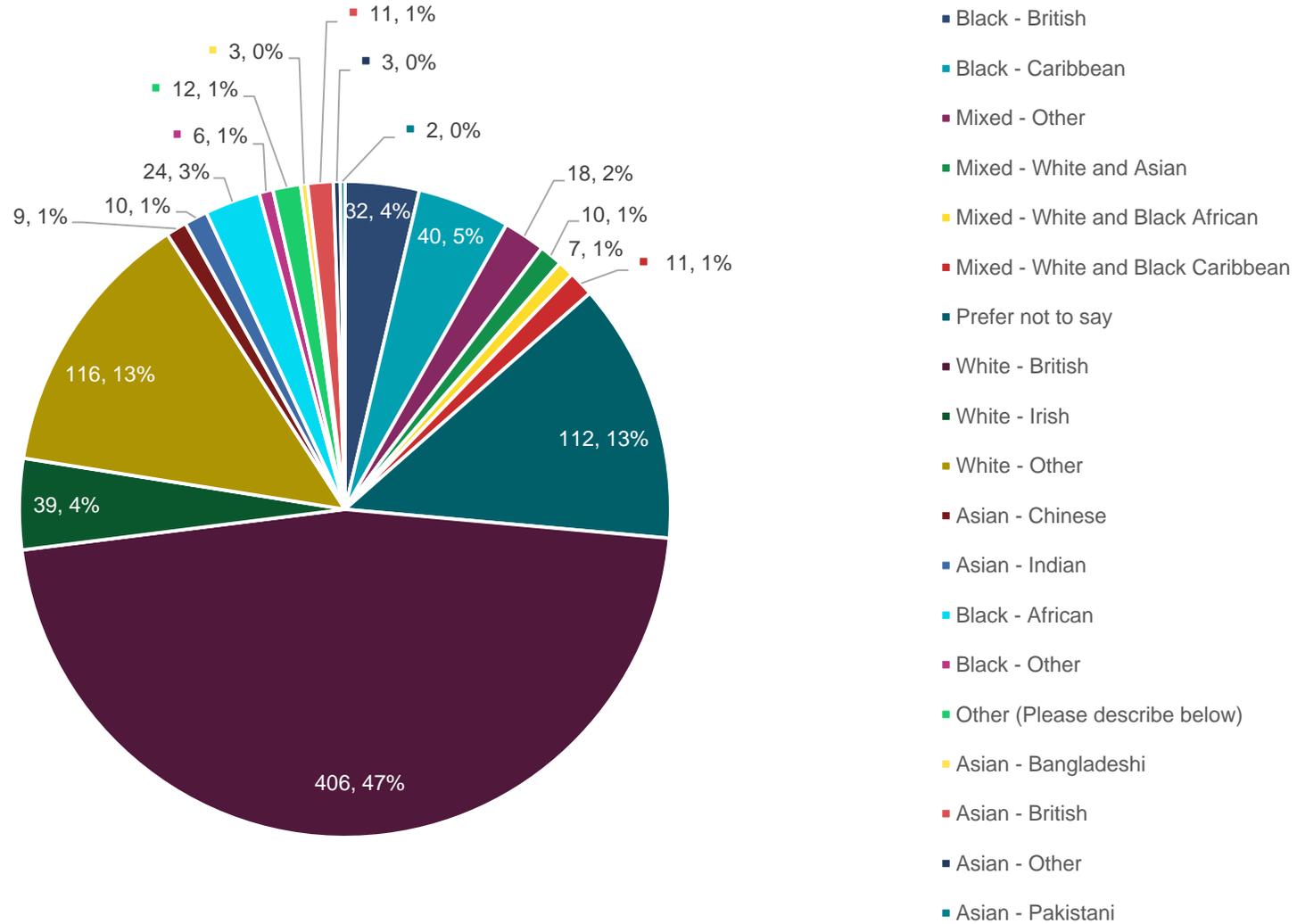
However, the high level of responses from landlords and also from wards within the borough which have higher proportions of white residents is likely to be responsible for the overall results.

Ethnicity of respondents

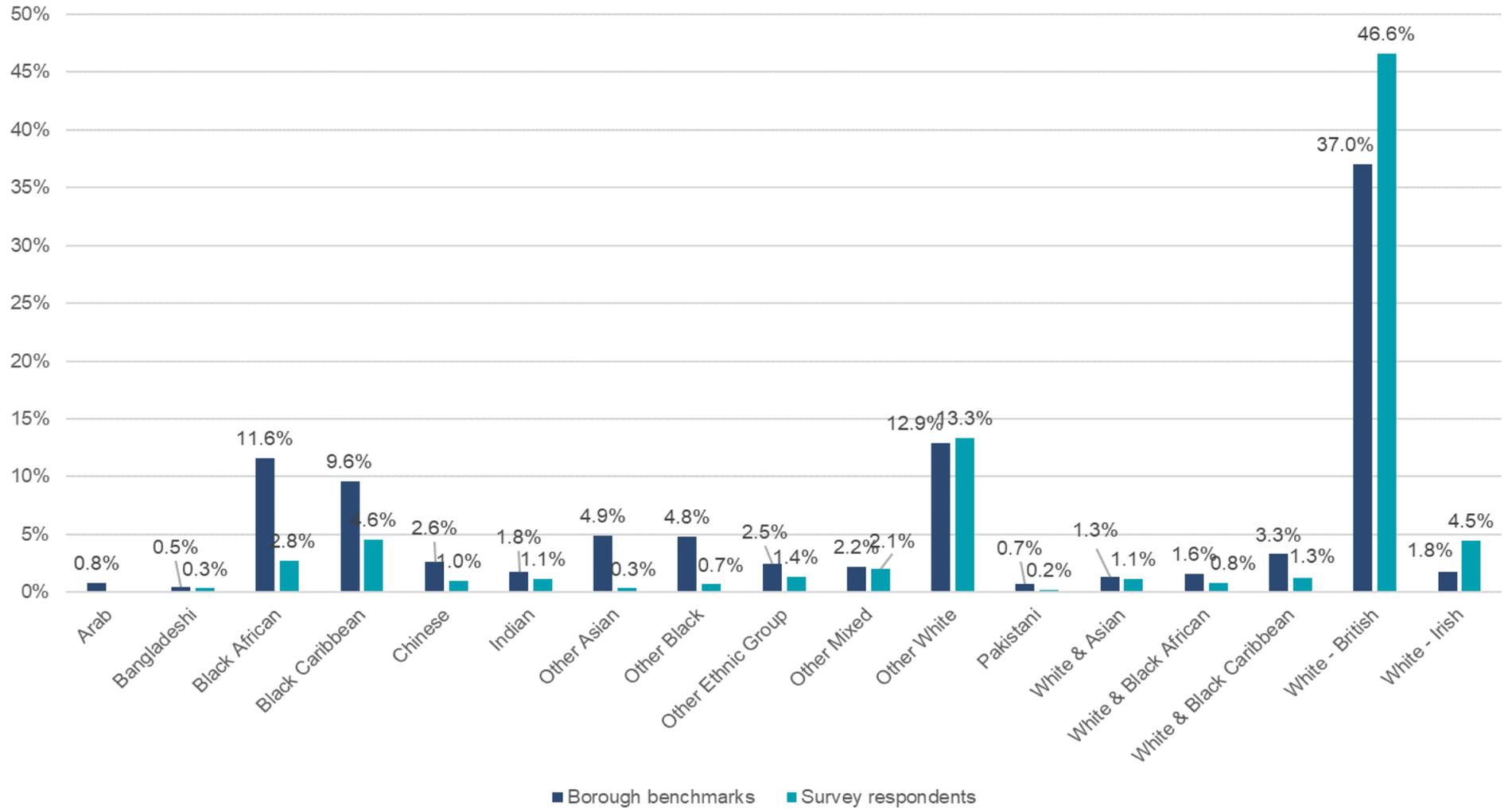


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## What is your ethnicity?



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