

Subject:	Private Sector Housing HMO Licensing Update		
Date of Meeting:	10 September 2014		
Report of:	Executive Director of Environment, Development and Housing		
Contact Officer:	Name:	Martin Reid	Tel: 293321
	Email:	Martin.reid@brighton-hove.gov.uk	
Ward(s) affected:	All		

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The principal tool for regulating standards in Houses in Multiple Occupation (HMOs) is HMO licensing. Currently HMOs of three or more storeys and with five or more occupants must be licensed under the Government's mandatory licensing scheme. The Council currently license and / or have licence applications for 1014 larger HMOs under the national mandatory licensing scheme applied City-wide.
- 1.2 The designation of an Additional Licensing scheme in the five Lewes Road wards (applying to smaller HMOs of two or more storeys and three or more occupiers) commenced on 5 November 2012. Housing Committee approved the designation on the basis of extensive consultation and robust evidence that a significant proportion of the smaller HMOs in the wards affected were being managed sufficiently ineffectively as to give rise to one or more particular problems either for those occupying the HMOs or for members of the public. As of 27 August 2014 the Council has received 1965 valid additional licence applications and checked and issued 1866 draft licences, of which 1779 have been followed up with full licences (often issued on condition that any work required is carried out within an agreed period)..
- 1.3 Following progress achieved under current licensing designations, this report outlines options to extend coverage and widen the scope of the existing schemes to address issues that continue to be raised in relation to management, standards and anti-social behaviour in relation to the expanding private rented sector in the City. The report outlines circumstances set out in the Housing Act where a local authority may consider establishing a Selective Licensing scheme or any further designation of Additional Licensing subject to statutory requirements in relation to consultation, evidence base and resourcing any new schemes. The report appendix includes a peer review of licensing schemes applied in other local authorities and an update on mapping of HMOs in the Lewes Road wards.

2. RECOMMENDATIONS:

- 2.1 That Housing Committee note progress with implementation of the Additional Licensing scheme in the five Lewes Road wards since the commencement of designation on 5 November 2012.

- 2.2 That Housing Committee note the legal parameters around further Additional Licensing and Selective Licensing schemes and agree a detailed options paper to be reported to a future Housing Committee on extending coverage and / or widening the scope of discretionary licensing schemes in the City.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Brighton & Hove is a growing city with an increasing population, rising demand for housing and fewer households accessing owner occupation. There has been significant growth in private rented housing in the City (including the number of HMOs) with the sector increasing by 45.7%, an extra 10,691 homes, between the 2001 and 2011 Census. The Private Rented Sector now stands at 34,081 homes (private renting from a landlord or letting agency) or 28% of all housing stock in the City (2011 Census). The City has the 9th largest private rented sector in England & Wales and 6th highest proportion of converted dwellings or shared houses (houses in multiple occupation and bedsits) in England & Wales.
- 3.2 The table below compares private renting from a landlord or letting agent in Brighton & Hove with numbers and percentages in England, London and the South East.

Area	All tenures (total)	Private rented: Private landlord or letting agency	% Private rented: Private landlord or letting agency
Brighton & Hove	121,540	34,081	28%
England	22,063,368	3,401,675	15%
London	3,266,173	775,591	24%
South East	3,555,463	521,479	15%

Source: Census 2011 (DC4101EW)

- 3.3 When compared with individual London boroughs the Brighton & Hove percentage renting from a private landlord or letting agency is the same as Lambeth & Hackney (which have 11th and 12th highest percentage in the Capital). The five London Boroughs with the highest percentage renting from a private landlord or letting agent are in the table below (a full breakdown for all London boroughs is in Appendix 3 of this report).

London	All categories: Tenure	Private rented: Private landlord or letting agency	%
Westminster	105,772	39,732	38%
Kensington and Chelsea	78,536	26,676	34%
City of London	4,385	1,451	33%
Newham	101,519	33,118	33%
Tower Hamlets	101,257	31,227	31%

- 3.4 The five wards in Brighton & Hove with the highest number of households living in homes rented via private landlords or lettings agents is outlined in the table below (a full breakdown for all wards in Brighton & Hove is in Appendix 3).

Households living in homes rented via private landlords or letting agencies		
	Number	%
Regency	3,190	56%
Brunswick & Adelaide	3,261	56%
Central Hove	2,681	50%
St. Peter's & North Laine	3,915	45%
Goldsmid	3,164	40%

Source: 2011 Census Table
DC4101EW

- 3.5 The five Brighton & Hove wards with the highest percentage increase of households living in homes rented via private landlords or letting agents between the 2001 and 2011 Census is indicated in the table below (a full breakdown for all wards is in Appendix 3).

Households living in homes rented via private landlords or letting agencies			
	2001	2011	Change
Moulsecoomb & Bevendean	579	1,259	117%
Hangleton & Knoll	257	547	113%
Hollingdean & Stanmer	409	826	102%
North Portslade	176	345	96%
Patcham	281	518	84%

Source: 2011 Census Table DC4101EW and 2001 Census

Private Rented Sector - benefits

- 3.6 The private rented sector is an important source of flexible housing supply in the City with a range of benefits including: Catering for a highly mobile population; Supporting university growth to the benefit of the local economy, labour market and cultural offer; Helping to address housing need in the city; Supporting investment in improving city housing stock; Supporting direct and indirect employment, including in local trades and businesses.
- 3.7 The sector has an important role in providing housing options for those not wishing or not able to consider home ownership or for those to whom social housing is not an option, as well as providing housing for the city's large student population. The council is keen to ensure that the sector meets the demands placed upon it by the housing needs of the wide range of tenants it services by providing well managed and quality accommodation. Over recent years, the property market has seen a surge in "Buy-to-Let" investors. The effects of a slowdown in the housing market may have had some deterrent impact on investment nationally, however local experience has been that demand for the private rented sector has remained strong because of population growth, continued university expansion and more households delaying becoming owner-occupiers and renting privately.

Private Rented Sector – issues.

- 3.8 Much of the private rented sector provides decent well managed accommodation, playing a key role in meeting housing requirements of a third of the households in the City. However there are problems with part of the sector arising from poor management, property conditions and related problems of anti-social behaviour. In particular, the private rented sector does have some problems for which statutory regulation, particularly licensing, may be required.
- 3.9 Our Private Sector Stock Condition Survey (2008) indicated that 35% of all private sector homes fail the Decent Homes Standard (national average 27.1%) and 36.9% of private rented homes fail it. This failure is largely driven by category 1 hazards under the Housing Health and Safety Rating System and poor standards of thermal comfort. This is likely to be aligned to the fact that a significant proportion of the city's stock was built before 1919, much higher than the national average, with solid walls and sliding sash windows, hindering energy efficiency with 42% of carbon emissions in the City coming from domestic sources.
- 3.10 In addition to HMO licensing the Private Sector Housing Team deal with service requests about standards within private sector housing in the City, including issues such as dampness, disrepair and drainage and complaints concerning nuisance caused by the condition of neighbouring properties. Service requests are reactive requests for assistance received by phone, email or in writing or via referral from other teams or agencies.
- 3.11 Between 1 April 2013 and 31 March 2014 the Private Sector Housing team was in receipt of 1128 service requests from private sector residents across the City. Of these 369 (33%) related to dampness and 226 (20%) related to non-emergency disrepair complaints. To date (as of 27 August 2014), since the commencement of the Additional Licensing designation across the 5 Lewes Road wards (5 November 2012), the Private Sector Housing team has been in receipt of 2150 service requests, of which 738 (34%) relate to dampness and 445 (21%) to non-emergency disrepair complaints. To date this financial year (1 April 2014 to 27 August 2014) the team have been in receipt of 394 service requests of which 86 (22%) relate to non-emergency disrepair and 80 (20%) to dampness (less of which is reported during the summer months).
- 3.12 In addition to stock condition and service requests received by the Private Sector Housing Team, the expanding private rented sector continues to have other impacts across the City. This includes the fact that loss of private rented sector accommodation remains the most common single cause for being accepted as homeless by Brighton & Hove City Council. In Q4 2013/14 reasons for homelessness included: 30% due to loss of private rented accommodation; 26% due to eviction by parents; 16% due to eviction by family and friends; 11% due to fleeing domestic violence.

Private Rented Sector HMOs

- 3.13 HMOs are amongst the more difficult to manage properties in the sector. Demand for HMOs is growing mainly aligned to demographics and affordability. Welfare reform and increasing private sector rents are making self contained accommodation unaffordable for many residents. With an increasing population,

including growth in student numbers through university expansion, and demand for more cost effective housing options, HMOs are increasingly being used to meet accommodation pressures across the City.

- 3.14 The Brighton & Hove City Council Stock Condition Survey (2008) and other data highlights that Brighton & Hove has an exceptionally high number of HMOs. Some are small bed-sits, others large shared houses. Many of the small bed-sits are concentrated in the centre of the City and often provide accommodation for the more vulnerable households. This is in addition to the significant and growing number of smaller HMOs along the Lewes Road 'corridor' providing housing for students and young professionals sharing the cost of rents.
- 3.15 In some HMOs the standards of management and living conditions can be poor. Research has shown the risk in HMOs from hazards such as fire can be as much as four or more times higher than the risk in a residential property occupied by a single household. Licensing allows local authorities to proactively identify and engage with landlords, particularly with the less responsible private landlords.
- 3.16 In relation to the existing additional HMO licensing scheme, Housing Committee (30 April 2014) has previously been advised that, in addition to the eight mandatory licence conditions, the five most common special conditions applied to additional licensed HMOs were:

	Hanover & Elm Grove	Hollingdean & Stanmer	Moulsecob & Bevendean	Queen's Park	St Peter's & North Laine	Total
Structural fire Works	423	129	492	57	279	1380
Fire Alarms	324	112	411	40	205	1092
Other Fire Works	470	143	526	64	314	1517
Management/ Repairs	295	93	360	38	193	979
Loft Insulation	231	69	291	23	142	756

Outline of the main Local Authority Housing Powers in relation to Private Rented Sector Housing

- 3.17 The Housing Act sets out a range of local authority powers in relation to private rented housing, including circumstances where a local authority may consider establishing a Selective Licensing scheme or any designation of Additional Licensing and the evidence needed to support this. Details on the main powers available to local authorities are below (including information from DCLG guidance – Dealing with Rogue Landlords – A Guide for Local Authorities - August 2012).

Housing Health and Safety Rating System

- 3.18 Housing Health and Safety Rating System (HHSRS) is an evidenced based system used to assess housing conditions in all residential property introduced under the Housing Act 2004. The Housing Health and Safety Rating System provides guidance for all residential properties, to detail a benchmark for ensuring that they are safe and habitable.
- 3.19 HHSRS comprises an assessment of the presence and severity of 29 hazards, including 'excess cold'. Local authorities have a duty to take enforcement action,

usually to secure necessary improvements, where Category 1 (serious) hazards are present. Local authorities also have discretionary power to intervene where Category 2 hazards are present. In determining the most appropriate form of action, local authorities can consider the vulnerability of persons living (or likely to live) in the accommodation.

- 3.20 Under HHSRS a local authority can carry out an assessment of a home and will look at the likelihood of a hazard arising from the condition of the property and what the harmful outcomes might be. As a result of the assessment, the council will be able to say whether the property has 'Category 1' (serious) and/or 'Category 2' (other) hazards. If the local authority discovers serious Category 1 hazards, they will first discuss these with the home owner or landlord to encourage them to deal with the problems. If this isn't successful, then they can: serve a hazard awareness notice to draw attention to the problem; issue an improvement notice to the landlord to carry out improvements to the property; take emergency action to fix the hazard where there is an immediate risk; ban the use of the whole or part of a dwelling or restrict the number of people living there using a prohibition order.
- 3.21 If a home owner/landlord doesn't carry out the requirements of a legal ('statutory') notice issued by the local authority, they could face a prosecution which could result in a fine which is currently up to £5,000 but will be increased to unlimited when section 85 of the Legal Aid Sentencing and Punishment of Offenders Act 2012 is fully in force.
- 3.22 HHSRS is resource intensive and can only be applied to dwellings on an individual case by case basis. It is generally a reactive process and does not place a legal duty on landlords to 'register' with the Council in the way licensing does and it does not impose conditions in relation to management. The legal imperative on landlords to improve dwellings only comes into force under this part of the legislation when the Council takes action against them, requiring matters to be rectified. Conversely, licensing requires the landlord to come forward and obtain a licence and applies conditions that must be met in the HMO.

Mandatory Licensing of Houses in Multiple Occupation

- 3.23 There is a statutory duty on all local authorities in England and Wales to license larger higher risk Houses in Multiple Occupation of three or more storeys housing five or more unrelated persons. These properties are seen as higher risk, both because of the nature and condition of the properties, and the vulnerability of their occupants. The mandatory Houses in Multiple Occupation licensing regime addresses poor management practices and aims to secure a reduction in death and injury from fire and other health and safety hazards, and ensures adequate provision of amenities.
- 3.24 Private landlords must be deemed to be a "fit and proper" person in order to be granted a licence. Local authorities can impose conditions on a licence, such as how the licence holder deals with the behaviour of occupiers and the maximum number of occupants allowed in the property. They can also impose conditions requiring adequate amenities and safety requirements to ensure decent standards in properties where there are several households sharing basic facilities. Breach of a licence condition is an offence currently subject to a fine of

up to £5,000. Letting or managing a property without a licence is a criminal offence currently subject to a maximum fine of £20,000.

- 3.25 The mandatory licensing scheme has been in operation in Brighton & Hove since 2006. The council currently license, or have licence applications for, 1014 larger Houses in Multiple Occupation across the City under the national mandatory HMO licensing scheme. Details of HMOs licensed under the mandatory scheme by ward as of 27 August 2014 are outlined below:

Mandatory HMO Licensing all wards (all applications, draft & full Licences at 27/08/2014)

Ward Name	Count of Licences
St. Peter's And North Laine	240
Hanover And Elm Grove	208
Queen's Park	111
Moulsecoomb and Bevendean	93
Hollingdean And Stanmer	66
Preston Park	65
Regency	57
Goldsmid	42
Brunswick And Adelaide	38
Central Hove	27
Westbourne	20
East Brighton	18
Withdean	8
South Portslade	7
Rottingdean Coastal	6
Wish	5
Hove Park	3
Total	1014

Additional Licensing of Houses in Multiple Occupation

- 3.26 Poor conditions and bad management practices can manifest themselves in smaller HMOs in specific areas. These smaller types of HMO may not meet the mandatory licensing criteria but there is a discretionary power to extend licensing to smaller types of HMO to reduce negative impact on occupier safety and the neighbourhood environment where they are poorly managed. Local authorities have a general consent to introduce such schemes subject to local consultation.
- 3.27 Section 56 of the Housing Act 2004 provides a power to license HMOs not covered by mandatory licensing through the creation of an Additional Licensing Scheme. Under Additional Licensing, local authorities can designate an area for a five year period if satisfied that a significant proportion of the HMOs are being managed sufficiently ineffectively so as to give rise to one or more particular problem, either for those occupying the HMO or for members of the public.
- 3.28 In order to introduce additional licensing for Houses in Multiple Occupation local authorities are required to consult with local residents, landlords and tenants for a

minimum of ten weeks. Local authorities are required to provide a robust evidence base for introducing a scheme, such as demonstrating there are significant management issues and poor property conditions that need addressing, within a designated area. Once a designation is confirmed landlords who operate licensable properties within the designated area will be required to apply for an HMO licence for each of their properties.

- 3.29 HMO licensing schemes are designed to be cost neutral to the Council as all associated costs for administering them are recovered through licensing fees. Landlords who operate the designated types of HMO without a licence may be subject to criminal prosecution.
- 3.30 Residents' benefit from licensing include: Safer healthier living conditions for residents of HMOs; Improved management standards in HMOs.
- 3.31 Concerns have been raised that some landlords, rather than license their properties, may change their business model and let to fewer individuals, single households or withdraw from the rental market. However, we have no significant evidence to prove this practice has been widespread following the introduction of the existing additional licensing scheme in the Lewes Road wards.
- 3.32 Housing Committee on 20 June 2012 designated the wards of Hanover & Elm Grove, Moulsecoomb & Bevendean, St Peters & North Laine, Hollingdean & Stanmer and Queen's Park as subject to Additional Licensing. As of 27 August 2014 the Council has received 1965 valid Additional Licence applications, broken down by ward as below:

Ward Name	Applications Received
Hanover & Elm Grove	525
Hollingdean & Stanmer	212
Moulsecoomb & Bevendean	752
Queen's Park	101
St. Peter's & North Laine	375
Total	1965

As of 27 August 2014 the draft licences issued by ward are as follows:

Ward Name	Draft Licences Issued
Hanover & Elm Grove	498
Hollingdean & Stanmer	198
Moulsecoomb & Bevendean	723
Queen's Park	93
St. Peter's & North Laine	354
Total	1866

Of these, full licences issued as of the 27 August 2014 by ward are as follows:

Ward Name	Full Licences Issued
Hanover And Elm Grove	478

Hollingdean And Stanmer	187
Moulsecoomb And Bevendean	701
Queen's Park	82
St. Peter's And North Laine	331
Total	1779

Information on all HMOs licensed under additional and mandatory schemes is publically available either on the Council website or direct via the Private Sector Housing Team.

Updated mapping of HMOs in the five Lewes Road wards incorporating details on applications under the national mandatory and additional licensing schemes and Council Tax information is included in Appendix 2 of this report.

The table below shows details of the ten managing agents with greatest number of additional HMO licenses as of 27 August 2014.

Agent Name	Number of additional licensed HMOs
MTM Property Services Ltd	155
Pavilion Properties Ltd	53
Homelets (Brighton) Ltd	50
Mr Dan Lyons	41
Greenfend Ltd T/a Cambridge Residential	40
Kendrick Property Services Ltd	39
Property Moves Ltd	38
Home Leasing Brighton Ltd	29
G K White & Company Ltd	28
Hove Lets Ltd	25

We have worked closely with landlords and agents on implementation of HMO standards allowing time to complete works where necessary and appropriate. While licenses are often issued with conditions (as in outlined in paragraph 3.16), to date it has not been found necessary to refuse any additional license applications. Those currently without full licences continue to be processed.

In the Housing Committee report of 20 June 2012 we estimated that there were potentially between 1,500 and 3,000 smaller HMOs in the five wards that may be subject to licensing under the Additional Licensing proposals. In order to ensure that landlords and agents of all licensable HMOs in the five Lewes Road wards comply with the Additional Licensing designation the Private Sector Housing Team have an enforcement programme targeting unlicensed HMOs. Under this programme we have identified up to 1000 dwellings which may be licensable but where licence applications have not been received. We are working through this list and to date have received 414 additional and mandatory licence applications

as a result. In addition, one landlord has been prosecuted after failing to respond to requests to submit a licence application.

Selective licensing

- 3.33 This is a discretionary Local Authority power to focus on improving the management of privately rented homes accommodating single households as well as HMOs in a designated area that is deemed to suffer from low housing demand and/or experiencing 'significant and persistent' problems with anti-social behaviour. Such schemes are subject to local consultation. Selective Licensing is intended to address the adverse impact that poor management by a minority of private landlords, and antisocial behaviour by a few tenants, can have on other tenants and the wider community.
- 3.34 In order to introduce a Selective Licensing scheme local authorities are required to consult with local residents, landlords and tenants for a minimum of ten weeks. Local authorities are required to provide a robust evidence base for introducing a scheme, such as demonstrating there are significant antisocial behaviour issues that need addressing within a designated area. Once a designation is confirmed landlords who operate within the designated area will be required to apply for a licence for each of their properties.

Landlord licensing schemes - Peer Review

- 3.35 A detailed review has been undertaken of discretionary licensing schemes applied in other Local Authorities in the South East and in London boroughs. This is attached in Appendix 1 for information / review by Housing Committee members.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 The 2004 Housing Act (Section 56(2)) requires that before making an additional HMO licensing designation for a particular type of HMO, or for a particular area, a local authority must consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of dealing with the problem or problems in question.
- 4.2 A two stage appraisal of the options open to the Council was carried out in accordance with Government guidance and reported to Housing Committee on 20 June 2012 in order to inform the decision on the additional licensing designation. The first stage involved the development of key options available for tackling poor quality problematic HMOs in the City and consideration of the strengths and weaknesses of each. The second stage involved the appraisal of the options against seven objectives identified to help contribute towards the Council's vision for the city's private rented sector. This work would need to be carried out again / revisited before considering any new licensing scheme.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 In order to introduce Additional Licensing for Houses in Multiple Occupation or any Selective Licensing local authorities are required to consult with local residents, landlords and tenants for a minimum of ten weeks.

- 5.2 In line with these statutory requirements Housing Committee report of 20 September 2012 outlined extensive consultation undertaken on Additional Licensing proposals for the five Lewes Road wards. In addition to attending various meetings including with landlord groups, representatives of letting agents and Local Action Teams, Housing Committee were advised of the following responses to consultation that took place from 18 January to 31 March 2012: 311 responses were received via the consultation portal (the majority from landlords and agents) with 44% (136) in favour and 56% (173) against; 1010 responses were received from the door to door survey of residents and businesses in the 5 wards. 71% (713) were in favour and 8% (81) against, with 14% (146) undecided and 7% (70) not answered.

6. CONCLUSION

- 6.1 This update report is for information only pending a detailed options paper being brought back to a future Housing Committee.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The additional license fees have generated income of £1.123m up to 31st March 2014 since the Additional HMO licenses were implemented in 2012. This has been used to offset costs of £0.429m for the same period with the balance of £0.694 being carried forward in reserves to offset future costs. Income received to date for this financial year is £0.059m and will be monitored through the budget monitoring processes (TBM).
- 7.2 The mandatory license fees have generated income of £1.077m up to 31st March 2014 since the Mandatory HMO licenses were implemented in 2006. There are £0.232m of reserves being carried forward to offset future costs
- 7.3 As stated in the 2014/15 General Fund Revenue Budget Report to Council on 27th February 2014, Subject to consultation and committee approval, the council's private sector landlord licensing scheme will be expanded to other areas of the city. Achievement of any additional income of up to £0.250m to cover eligible costs is aligned to implementation of further licensing in 2014/15 if agreed. The options report to be brought to this committee in accordance with the recommendations will include the financial implications of the proposed scheme.

Finance Officer Consulted: Neil Smith

Date: 29/08/14

Legal Implications:

- 7.4 The council's powers to introduce Additional Licensing and Selective Licensing derive from Parts II and III of the Housing Act 2004. A brief outline of the relevant provisions is included in the report at paragraphs 3.27 - 3.28 and 3.33 - 3.34. No individuals human rights are adversely affected by the report's recommendation.

Lawyer Consulted:

Name Liz Woodley

Date: 28.08.14

Equalities Implications:

- 7.5 A full equalities impact assessment was undertaken in relation to the additional licensing designation for the five Lewes Road wards. No negative consequences of additional licensing were identified. A further equalities impact assessment would need to be undertaken should any further licensing proposals be forthcoming.

Sustainability Implications:

- 7.6 Maintenance and improvement of existing housing stock is generally more sustainable than continued deterioration. Adoption of measures such as licensing of HMOs should improve management and standards for the residents in those homes and the liveability of residential areas impacted by large numbers of HMOs more generally.

Any Other Significant Implications:

- 7.7 Please see below.

SUPPORTING DOCUMENTATION

Appendices:

1. Local Authority discretionary licensing peer review.
2. Updated HMO mapping Lewes Road wards.
3. Full statistics for Private Rented Sector

Documents in Members' Rooms

1. None

Background Documents

1. Housing Committee 20 June 2012: Proposed Additional Licensing Scheme for Houses in Multiple Occupation (HMO), including Appendix 1: Report for Additional Licensing for Housing in Multiple Occupation; Appendix 2: Standards.
2. Housing Committee 26 September 2012: Update on the Implementation of the Additional Licensing Scheme for Houses in Multiple Occupation (HMO).
3. Housing Committee 19 June 2013: HMO Licensing Update.
4. Housing Committee 30 April 2014: HMO Licensing update

Crime & Disorder Implications:

- 1.1 An Additional Licensing designation aligns to evidence of significant management issues and poor property condition that need addressing within a designated area.

Risk and Opportunity Management Implications:

- 1.2 The risks associated with the proposals in this report have been managed in compliance with the Council's risk management strategy and a full risk log was presented to Housing Committee on 20 June 2012.

Public Health Implications:

- 1.3 Improving housing conditions reduces ill health among residents and produces quantifiable cost benefits to health and social care budgets. In terms of community wellbeing and resilience the Director of Public Health's Annual Report identifies that Housing in Brighton & Hove represents a particular vulnerability for children and adults. The Joint Strategic Needs Assessment identifies that poor housing conditions present risks to health. Any improvement of management and standards of HMOs arising from HMO licensing should have a beneficial Public Health impact.

Corporate / Citywide Implications:

- 1.4 In exercising its discretion to make an additional licensing designation the Council must ensure that any exercise of the power is consistent with its overall Housing Strategy. Housing Committee approved the Additional Licensing designation on the basis of extensive consultation and robust evidence that a significant proportion of the smaller HMOs in the five Lewes Road wards affected were being managed sufficiently ineffectively as to give rise to one or more particular problems either for those occupying the HMOs or for members of the public. The scheme should have a beneficial impact on communities in the areas covered by the designation. Residents in other parts of the city may consider that issues that have led to proposals for additional licensing in the five identified wards also exist in their area. The experience with mandatory licensing suggests that additional licensing would have no significant adverse effect on property supply.