

Appendix 6

Format	Representation Theme	Summary of Query/FOI/Complaint	Representation's Proposed Change	Council's Response	Impact on Scheme
Letter	Administration of the scheme: including fairness, The licence conditions, Ability of the council to deliver: including existing powers, resources, bureaucracy	strong objections to proposal inc comments and views on the consultation 1. What benefit will be provided for money paid for licence? 2. Who will define locations? 3. ASB, why not use existing laws? 4. Time wasting by Council 'looking over landlord's shoulder'. 5. Unnecessary bureaucracy, costs and timewasting for landlord 6. copies sent to MP & ward Cllr	Do not proceed with licencing	Advised views and comments welcome. consultation timescale, web link provided. Advised FAQ's answers questions and queries; all responses analysed with all info prior to recommendations made to Members. Invite to landlord forums, web link provided & leaflet copy sent to ORS for report	Increased automation of application process and built in self certification and declarations into service design to relieve administrative burden on compliant landlords
Email	Information Request	Requested copy of NKM report	N/A	Advised outcome of NKN's report included in consultation doc. Provided link to website Further Email received on 30/01/14 - respondent no satisfied with response & requested copy of NKM report. Copy of report Emailed to respondent on 31/01/14	No Change
Telephone Call	Information Request	Mr H concerned his former landlord has carried out repair obligation. To Email with full details of landlord and property address	N/A	n/a no address. Email or phone number provided copy of Telephone Call details sent to ORS for report	No Change
Letter	Supports Licencing	In favour of licencing proposal, landlords should be responsible for their tenants behaviour, too many problems with immigrant tenants. Council have turned blind eye in the past to the problems in spite of complaints	N/A	n/a no address. Email or phone number provided copy of Telephone Call details sent to ORS for report	No Change
Telephone Call	The fee structure	Mr P asked why Enfield introducing fees for landlords, what will happen if not licensed?	N/A	Mr P advised each case decided individually depending on circumstances. May result in fine/prosecution. Further advised to read consultation documents on line - Email link Email copy of Telephone Call details sent to ORS for report	Full licence fee reduced from £575 to £500.
Telephone Call	The fee structure, Ability of the council to deliver: including existing powers, resources, bureaucracy	Mr W received leaflet, claims many friends (other landlords) not received info about consultation. Agreed with licencing but had many questions, concerns such as:- fee revenue raising, laws in place to deal with issues, how will licence tackle rogue landlords & ASB issues? good landlords	N/A	Mr W listened to & questions answered, advised of FAQ's, and forum dates for attendance copy of Telephone Call details sent to ORS for report	Full licence fee reduced from £575 to £500.
Email	Scheme not seen as an effective tool to reduce ASB	Queried consultation process, nos of years Council been running ALS, why so few landlords joined ALS, outcomes of ALS, & requested copy of NKM report.	N/A	Provided brief summary of current process, including engagement activity with landlords. Advised ALS running for approx. 16 years, scheme voluntary, outcomes inc. access to council services, advice & support, training on best practices, open forum to discuss any landlord related issues. satisfied with response	No Change

Appendix 6

Email	Administration of the scheme: including fairness. The fee structure, The licence conditions, Ability of the council to deliver: including existing powers, resources, bureaucracy	1. If proposed licence relates to houses only, 2. request for cost analysis for fee levels, 3. staffing plan for administration of scheme, 4. nos of staff planned to check validity of doc's requested in licence, 5. nos of staff targeted to enforce scheme, 6. comparison of social rented growth with PRS, 7. nos of landlords attended L&E forums, 8. target for nos of responses required for consultation meetings, 9. metrics in place for judging success of scheme, 10. what is current level of ASB & targeted level	Various	Draft awaiting approval	Increased automation of application process and built in self certification and declarations into service design to relieve administrative burden on compliant landlords. Full licence fee reduced from £575 to £500
Email	Administration of the scheme: including fairness	Requested confirmation that council's approach will be proactive preventative	Ensure that council's approach will be proactive preventative	Advised proposal to have a proactive inspection regime with robust enforcement	Inspection will be intelligence lead and risk based
Email	Complaint about consultation process	landlord meetings close to each other- so limited a spread of dates.	N/A	referred to ORS to respond as dates chosen by ORS from list of dates they were available. Requested they offer to interview landlord separately, offer to write a submission to be included in report or ask for any specific questions to be raised at meeting on his behalf.	No Change
Telephone Call	Information Request	Rec'd flyer & Letter. Wanted to know purpose of L/lorrd meetings as going to be away.	N/A	Informed her of current consultation & referred to web for details and to complete questionnaire. May send rep on her behalf - requested she confirm attendance with ORS.	No Change
Telephone Call	Information Request	Wanted clarification on what consultation about.	N/A	Provided details & referred to web. Emailed her link to consultation. Respondent to contact ORS to confirm attendance at meeting.	No Change
Email	The licence conditions	1. Is Council providing an on line facility for licence applications, 2. is council checking doc's before application approved.	N/A	1. Confirmed proposed licence application process to be automated/online process. 2. Advised that operating principles will be the checking & validation of doc's over the lifetime of the scheme.	Increased automation of application process and built in self certification and declarations into service design to relieve burden on compliant landlords
Telephone Call	The fee structure, Ability of the council to deliver: including existing powers, resources, bureaucracy	1. Why Licence fee £575, 2. How will Council deal with ASB if tenant responsible, & feedback from LBN licensing in reaction to fee level & how scheme made LB £10m	N/A	1. To cover cost of administration of scheme, 2. L/lorrd to deal with tenancy & property management issues inc ASB. Support continued to be provided by Council & other agencies but responsibility will remain with landlord. LNB not inspected properties & used licensing to target rogue landlords & make money. LBN licence fee reduced to £150	Full licence fee reduced from £575 to £500. Council committed to offering advice and guidance to landlords who are having difficulties managing tenants behaviour.
Letter	Suggestions	Provided suggestions on how LBE can stop ASB by private tenants & landlords	Suggestions on how LBE can stop ASB by private tenants & landlords	copy sent to ORS for report	No Change
Email	The licence conditions	Re draft licence conditions - 1. will a landlord without an agent still have to hold £10000 contingency budget, 2. Will all repairs have to be paid via the cont. budget, 3. if money taken out of budget will it need replacing asap.	Re draft licence conditions	1. Contingency budget to be held by the person having control of the property, 2. Do not need to use cont. budget. Included in conditions to cover emergencies / cat 1 repairs, 3. Not straight away but must be replenished within reasonable time, i.e. 3 months.	Requirement for contingency budget adhered to. Built in self-certification and declarations to reduce the burden of providing paperwork.
Telephone Call	Information Request	Wanted clarification on consultation in plain English.	N/A	Provided details & referred to web. Respondent to contact ORS to confirm attendance at meeting.	No Change

Appendix 6

Email	Information Request, The evidence base – including link to PRS and ASB	1. request copy of NKM report, 2. the additional analysis of council's data, 3. views of stakeholders, 4. source data confirming Enf. has 27,500 properties rented as PRS homes...	N/A	Sent copy of the report and reference to data sets used.	No Change
Letter	Supports Licencing	In favour of proposal. Seen that it will improve borough, reduce ASB and raise standard of rented properties. Long overdue!	N/A	Copy sent to ORS for report	No Change
Letter	Supports Licencing	Agreed ASB major & growing problem & PRS landlords should be licensed	N/A	Copy sent to ORS for report	No Change
Letter	Ability of the council to deliver: including existing powers, resources, bureaucracy	Against proposal - considered as unwarranted bureaucracy.	Do not proceed with licencing	Copy sent to ORS for report	Reduced inspections regime of compliant landlords. Inspection programme changed to at least one property per landlord not 100% of properties. Inspection to be risk based and intelligence led.
Letter	Supports Licencing	Good idea - can only improve borough & reduce ASB	N/A	Copy sent to ORS for report	No Change
Email	Information Request	Are resident landlords subject to licencing	N/A	advised this type of letting arrangement is exempt from proposed licencing scheme.	No Change
Email	Complaint about consultation process	Ineffective/limited publicity campaign & lack of transparency of Council's objectives	N/A	Referred to FAQs on the website for information	No Change
Letter	The evidence base – including link to PRS and ASB	Took part in LBN consultation. Requesting to see statistics we may have obtained from Newham to show if licencing tackled ASB.	N/A	Telephone Called agent & left voice mail to call me with enquiries. Copy of Letter sent to ORS	No Change
Letter	Complaint about consultation process	Would like concerns recorded in minutes of landlord meetings/report	N/A	copy sent to ORS for report	No Change
Email	Administration of the scheme: including fairness. Scheme not seen as an effective tool to reduce ASB	Against proposal- ASB associated to all tenure groups. Respondent sees this as a punishment- need to prosecute perpetrators of ASB & rogue /lords not decent ones. /lords providing a service to LA, what will happen if properties withdrawn. Legislation protects tenants more than landlord. Council wrapping up tenants in cotton wool - fine tenants/stop benefits found to be causing ASB. Eviction process too long & Council advise tenants to remain in property until eviction date. What are the benefits to the landlords?	Do not proceed with licencing	Advised comments & feedback will be forwarded to ORS for analysis of all respondents views from consultation activities. Explained Governance process relating to decision making process.	Council committed to improving the information and guidance available to landlords who are having difficulties managing tenants' behaviour
Email	Information Request	What is the cost of the LPRH consultation on licencing private rented landlords? How many public consultations have been undertaken since January 2013? How much did each consultation cost?	N/A	Given information on the consultation process	No Change
Telephone Call	The fee structure. The evidence base – including link to PRS and ASB. Scheme not seen as an effective tool to reduce ASB	ASB not just from PRS - comes from all tenure types. Agents create some of the problems for independent landlords, i.e. not paying rent & managing properties properly. Doesn't mind £250 fee level but £575 excessive. Previously leased his property via PSL scheme but withdrew due to poor rent levels, hence moved to a letting agent.	Various	Feedback noted and included in the report	Full licence fee reduced from £575 to £500
OSC	Consultation Query	N/A	N/A	Sent Email asking for clarification of enquiry.	No Change
Email	scheme not seen as an effective tool to reduce ASB	Contradiction that LBE proposing licencing of PRS when Council provides the disruptive tenants to place in Home finder property.	Do not proceed with licencing	copy of Email sent to ORS	No Change

Appendix 6

Email	Administration of the scheme: including fairness	What legal framework does the Council have to introduce such a scheme?	N/A	Legal framework information provided, fiao, Clir X via Complaints team copy of query and response sent to ORS	No Change
Telephone Call	Consultation Query	General feedback following press release in Enfield Gazette and complaint against the proposed scheme	Do not proceed with licencing	Advised to read full scheme proposal on website and to complete on-line questionnaire. Web-link Emailed to tenant with contact details copy of query/Telephone Call and Email sent to ORS	No Change
Telephone Call	Scheme not seen as an effective tool to reduce ASB	Strongly opposes scheme & Council needs to get own house in order	Do not proceed with licencing	copy of feedback sent to ORS	No Change
Telephone Call	Scheme not seen as an effective tool to reduce ASB	Independent landlord meeting arranged & wanted our thoughts on getting together a collaborative group of landlords to 'work on making the proposal more effective in its implementation' and if so, if we have progressed this.	Introduction of a collaborative scheme between landlords instead	Spoke to Mrs R and left message advising that this is an option that we are considering but has not been progressed.	Council committed to working with a small collaborative group of landlords to work on making the proposal more effective in its implementation
Email	Scheme not seen as an effective tool to reduce ASB	strongly opposes proposal, considers ASB to be associated to Council tenants & HB claimants, considers licencing unfairly discriminatory to private landlords.	Do not proceed with licencing	Email forwarded to ORS	No Change
Email	The licence conditions	What system being used to assess cat 1,2 & 3 hazards. Concerned that if we use HHSRS system, it will be hard for landlords to use/follow and more recently quoted as out of date & not fit for purpose in a recent government consultation paper on private rented sector housing.	N/A	Informed that it will be the HHSRS system used to determine the category 1 hazards. Points noted on the difficulties experienced by landlords in following this but it is a national standard required by the government.	Increased automation of application process and built in self certification and declarations into service design to relive burden on compliant landlords
Telephone Call	Supports Licencing	Agreed ASB major & growing problem & that PRS landlords should be licensed	N/A	Agreed will forward respondents' contact details to Acomm. Services Acquisition Officers to consider renting property via a T/A scheme.	N/A
Email	Information Request	list of enquiries referred by ORS	N/A	being collated from designated officers	N/A
Email	The licence conditions	Licence conditions, who is responsible for the contingency budget for repairs of £1000.00	N/A	Landlord/owner of property responsible for the budget; it to be held by the managing agent	Requirement for contingency budget adhered to.
Email	Consultation Query	Multiple queries	N/A	referenced evidence on website and consultation documents. Sent information on the consultation process the large scale events held in January and February.	N/A

Appendix 6

Telephone Call	Information Request	<p>When will licensing come into force? Will licence fee be for each property? Will Grandfather will be exempt from licensing as he is living in the property? For example if agent managing who responsible for licence? if garage turned into habitable room and main property is rented out as single family dwelling, will the separate tenancies be licensable individually? Mr P aired his views on the proposed scheme: Feels it is a load of rubbish, is a tax for landlords, worst types of anti-social is in Council property, has seen really bad housing situations as he works in Enfield, does not feel that licensing to tackle anti-social behaviour Mr P will Email any further questions he may have to the PRSH Email box</p>	Various	Advised Mr P of scheme proposal and further info on website. Provided Email address for further queries	N/A
Email	Extensive and Various	1. Nos of complaints rec'd about private l/ords between 1/1/13 - 1/1/14 under 2004 Act, 2. Nos of l/ords accused, 3. nature of complaints, 4. action taken by council.	Various	Extensive and various	N/A
Email	Consultation Query, The evidence base – including link to PRS and ASB	FOI	N/A	Sent copy of the report and officer details	N/A
Letter	Administration of the scheme: including fairness	Against proposal - considers it as a form of taxation on landlords	Do not proceed with licencing	Copy of Letter to ORS	No Change
Letter	Information Request	Request copy of NKM report & acknowledgment of Letter opposes proposal for selective licensing, not conducive to deal with ASB, futile effort by Council to make money. Agrees that letting agents to have some form of regulation act like a 'pack of wolves'. Also agrees that HMO's should be licensed. Tenants should be given info sheet by l/ords to highlight their obligations. Good landlords look after their assets. as	N/A	Sent copy of the NKM report	N/A
Telephone Call	Administration of the scheme: including fairness	ASB not coming from PRS - down to council tenants. What is Council going to do to support landlords in dealing with ASB, & what is council going to do with licence fee?	N/A	Advised feedback will be submitted to ORS for inclusion in our findings.	Full licence fee reduced from £575 to £500
Telephone Call	the fee structure, Scheme not seen as an effective tool to reduce ASB	Attended LL forum held at Palmerstone Rd 2 weeks ago. Request for assistance with private rented property	Do not proceed with licencing	Referred respondent to website to look at consultation. Advised council is looking at ways to support landlords to deal with ASB in addition to existing powers.	Council committed to improving the information and guidance available to landlords who are having difficulties managing tenants' behaviour
Telephone Call	Information Request	Fairness re: HMO's – one licence per property or one licence per lettable room?	N/A	Mould & damp and information leaflets to be sent to tenant and info to landlord	N/A
ORS Report	Administration of the scheme: including fairness	Should be one licence per property	Should be one licence per property	One licence per HMO property or lettable room	No Change
ORS Report	Administration of the scheme: including fairness	What support can we expect from the Council in helping to implement the scheme?	Query on working of the scheme	Council will provide detailed guidance and an all in one application process	Council committed to improving the information and guidance available to landlords who are having difficulties managing tenants' behaviour. Increased automation of application process and built in self certification and declarations into service design to relieve burden on compliant landlords
ORS Report	Administration of the scheme: including fairness	Costs could run into thousands for those with multiple properties – what assistance/recognition is there of this?	Query on working of the scheme	Accept this point and the Council will amend the scheme	Reduced inspections regime of compliant landlords. Inspection programme changed to at least one property per landlord not 100% of properties. Inspection to be risk based and intelligence led.

Appendix 6

ORS Report	Scheme not seen as an effective tool to reduce ASB	What recognition has been made of the tenant/landlord relationship and the ability of landlords to control their tenants?	Query on working of the scheme	The Council expects licence/lease terms to be more vigorous and for landlords to take more responsibility, but expects that landlords cannot be wholly liable for their tenants' actions.	Council committed to improving the information and guidance available to landlords who are having difficulties managing tenants behaviour.
ORS Report	The Fee Structure	Fee too high compared with Newham	Reduce Fees	Re -Considered fee structure	Full licence fee reduced from £575 to £500.
ORS Report	The Fee Structure	The programme is designed to make money for the Council	Criticism of the Scheme	Testing of scheme to ensure is cost neutral will be carried out. Councils are not permitted to make money out of these schemes.	No Change
ORS Report	The licence conditions	Better use of existing powers could solve the issues without scheme	Do not proceed with licencing	In the Council's view this would be ineffective.	No Change
ORS Report	The licence conditions	System of penalising for non-compliance unclear and possibly unfair?	Query on working of the scheme	The Council has clearly set out the circumstances for non compliance. See FAQs on the council website	No Change
ORS Report	The evidence base – including link to PRS and ASB	Correlation does not prove causation	Criticism of the Scheme	Council accepts this	No Change
ORS Report	The evidence base – including link to PRS and ASB	Simplistic approach to assessing ASB that does not take into account wider environmental factors	Criticism of the Scheme	Council has extensively researched the evidence and identified particular types of ASB which relate to the PRS and considers this sufficient evidence to warrant intervention.	No Change
ORS Report	The evidence base – including link to PRS and ASB	Correlation levels low	Criticism of the Scheme	The Council view that correlation levels are sufficient to taking action	No Change
ORS Report	The evidence base – including link to PRS and ASB	Need to revisit and retest data supporting correlation	Query on working of the scheme	Currently the Council views that the data is sufficiently robust but longer term, it will need evaluation	No Change
ORS Report	The evidence base – including link to PRS and ASB	Publish academic report	N/A	Report is one of the background papers published with the cabinet report and on the website	No Change
ORS Report	Ability of the council to deliver: including existing powers, resources, bureaucracy	The programme will be unable to be administered to costs due to complexity	Query on working of the scheme	Administration has been factored into the scheme is considered workable a cost neutral over the lifetime of the scheme.	No Change
ORS Report	Ability of the council to deliver: including existing powers, resources, bureaucracy	Documents required overly bureaucratic	Criticism of the Scheme	Council has sought to minimise the amount of documentation required which is proportional to the licencing scheme	Reduced inspections regime of compliant landlords. Inspection programme changed to at least one property per landlord not 100% of properties. Inspection to be risk based and intelligence led.
ORS Report	Ability of the council to deliver: including existing powers, resources, bureaucracy	Absence of any reference to proper evaluation	Query on working of the scheme	The scheme will be evaluated	No Change
ORS Report	Ability of the council to deliver: including existing powers, resources, bureaucracy	What is the approach for communal areas – unclear	Query on working of the scheme	This is not a consideration for the Council but for discussion between landlords and managing agents.	No Change
ORS Report	Ability of the council to deliver: including existing powers, resources, bureaucracy	How will the Council police the scheme effectively to ensure compliance?	Query on working of the scheme	Council will use an intelligence lead and risk based inspection regime	Inspection will be intelligence lead and risk based
ORS Report	Scheme not seen as an effective tool to reduce ASB	Unclear on how ASB elements categorised can deliver the outcomes on their own	Query on working of the scheme	Council have identified four key ASB issues linked to PRS and the licencing scheme is intended to address these alongside other, existing, council ASB measures. It is considered that this broader range of measures will deliver the reduction in ASB in these types.	No Change
ORS Report	Scheme not seen as an effective tool to reduce ASB	What predictive principles are being used to ensure the scheme can have a positive impact on reducing ASB?	Query on working of the scheme	Council will continue to monitor ASB outcomes over the lifetime of the scheme on measurably agreed performance indicators and targets	No Change

Appendix 6

ORS Report	Scheme not seen as an effective tool to reduce ASB	What are the measurable outcomes and what evidence is used to illustrate them?	Query on working of the scheme	The measurable outcomes are the predefined ASB indicators. This data is updated periodically and will be monitored over the lifetime of the scheme and is supplemented by a qualitative assessment.	No Change
Landlord forum	Information request	Requested copy of the NKM report	N/A	Emailed copy of the report	No Change
Letter	Complaint	scheme is an attack on private landlords and will have a negative impact of landlords continuing to provide accommodation in the borough.	Do not proceed with licencing	Council noted the availability points raised but the Council does not envisage that licencing will impact of good quality providers working in Enfield.	Full licence fee reduced from £575 to £500.
Telephone Call	Ability of the council to deliver: including existing powers, resources, bureaucracy	Proposal is bureaucratic and will waste time and money for landlords and provide no benefits to tenants. Queried how the scheme will be different from Newham	Do not proceed with licencing	Explained the intended web focused application process. Noted comments regarding Newham and explained governance process after the consultation closes.	Increased automation of application process and built in self certification and declarations into service design to relive burden on compliant landlords