Creating a Fairer Private Rented Sector

Additional HMO and Selective Licensing Consultation

Medway Council's response to comments and representations received during the public consultation

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1. Introduction

In order to improve the standard of privately rented property in Medway, Medway Council is proposing to introduce an additional HMO licensing scheme which will apply to houses in multiple occupation (HMOs) in six out of 24 wards, as well as a selective licensing scheme which will apply to all privately rented properties in seven out of 24 wards. During the consultation, the council received a range of responses regarding the proposed new schemes and the wider private rented sector (PRS) in Medway. The Housing Act 2004 requires the council to consider any representations made in accordance with the consultation which are not withdrawn. The following is the council's formal response to these representations, which have been considered by the council.

2. Positive responses to the proposed schemes

The council would like to acknowledge some of the comments received during the consultation in support of the proposed schemes. These have helped to validate the council's approach and highlight the strengths of the proposal, which will be built upon to make the schemes even more effective.

- *"Licensing schemes, if well implemented and properly enforced, have the potential to improve housing conditions for tenants, support responsible landlords and reduce the negative impact that poorly managed rented properties can have on neighbourhoods."*
- *"I 100% fully support this scheme. I moved to Medway from London in 2021 and I am a homeowner. The situation is no different to inner London, renters especially short-term renters tend to have little regard to their environment and neighbors because they're not invested like homeowners and long-term renters. Landlords generally aren't concerned as long they're receiving their rent/income/profit. Medway is beautifully located and has so much potential but there is a massive amount of behavioral change required and investment and I view this as a first good step on what will be a long journey."*
- *"I whole heartedly support the new proposals regarding the private rental sector and am sure it will help to make housing better for the most vulnerable"*
- *"As a local resident I strongly support the action the council is proposing to improve standards in the HMO sector."*

3. Main themes from consultation feedback

The consultation focused on the extent to which respondents agree or disagree with the council's proposal to introduce the selective and additional HMO licensing schemes. The consultation also looked at views on the proposed licence conditions and fees.

The consultation questionnaire featured free text boxes which provided respondents with opportunities to comment on the proposals in their own words, specifically:

- If you disagree with the proposals for an additional HMO licensing scheme, please can you explain why and what alternatives you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for additional HMO licensing please can you explain why?
- Are there any other additional licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below
- If you disagree with any of the above [selective licensing scheme outcomes], please can you explain why and what alternatives you think should be considered to address the problems?
- If you disagree with any of the discretionary conditions for selective licensing, please can you explain why?
- Are there any other selective licence conditions (that are not already covered by a mandatory or proposed discretionary licence conditions) that you think should be included? If 'Yes', please state below
- If you disagree with any of the objectives for the licensing scheme, please can you explain why?
- Are there any other licence scheme objectives (that are not already covered by the objectives listed) that you think should be included? If 'Yes', please state below
- Is there anything else you think the council should consider to help improve the condition and management of the private rented sector in Medway? Are there any other comments that you would like to make about the proposed additional HMO and/or selective licensing schemes?

The comments and feedback from the online survey, written representations received and those made during online public forum events have been analysed and categorised into themes. The council's response to these comments and themes are shown below:

3.1 General comments about licence conditions

The following outlines **general** comments received about the licence conditions.

Theme	Example comment	Comment source	Council response
Selective Licence Condition 9.9 **Additional HMO Licence Condition 18.4**	*We are concerned regarding the wording of the licencing condition outlined in Appendix 2, 9.9: "Any waste generated during building work or during change of tenancy (for example old furniture or bedding) from the house is not left on, or immediately outside, the house or private land and is disposed of in a safe and lawful manner." Whilst we understand that a responsible landlord should remove waste from the property during works or end of tenancy, we are concerned that the wording would make a landlord liable for waste left by tenants outside of the property at the end of tenancies. A landlord can advise tenants to remove all waste and goods from the property at the end of a tenancy but should not be held liable for what would usually be considered fly-tipping by the tenant. If selective licensing is implemented, the wording of this condition should be altered to reflect the landlord is responsible solely for waste remaining at the property due to their own actions or decisions; not for the tenant's.* *We are concerned about the proposed condition outlined in Appendix 3 18.4, which states: "Where the standard local authority waste collection schemes do not suffice, the licence holder must arrange for private collections of waste from the*	NRLA	The council's objective is to promote shared responsibility and improve the overall quality and cleanliness of neighbourhoods. The licensing framework enables the council to engage directly with landlords and managing agents to ensure that adequate waste storage facilities are provided, tenants are informed of their responsibilities, and waste management arrangements are clearly documented and monitored. We fully acknowledge that landlords cannot be held responsible for actions beyond their control. However, through licensing, they are well positioned to set clear expectations, maintain appropriate property standards, and work collaboratively with tenants to prevent unlawful waste disposal issues.

Theme	Example comment	Comment source	Council response
	property." Landlords should not be held responsible for excess waste beyond what is allocated for by a local authority. If tenants of a property produce waste beyond what is usually allocated for, then they should be required to fund the extra waste collection. This could be done via a permit service from the council, similar to the garden waste subscription.		
Misinterpretation of 'discretionary' conditions	*I don't think there should be any discretionary conditions… these could be left open fit manipulation and not complied with there needs to be very tough control of HMO's*	Consultation survey comments	We appreciate the feedback received regarding the interpretation and application of discretionary licence conditions. To clarify, the selective and additional HMO licensing schemes include two types of conditions: • mandatory conditions, which are required by national legislation and apply uniformly across all licences; • discretionary conditions, which local authorities have the power to design and implement in response to specific local housing needs and priorities. While the term "discretionary" may suggest flexibility, once these conditions are adopted as part of the licensing scheme, they are not optional for landlords. They are enforceable and will be applied consistently across all licences issued under the scheme. The council may, however, apply additional conditions in specific cases where circumstances warrant further oversight.
	There should not be discretionary conditions if you make it tough to rent out a property I believe you will get a better quality landlord		
	The discretionary items should either be mandatory or not exist		

Theme	Example comment	Comment source	Council response
			These discretionary conditions are intended to complement mandatory standards and enable the council to address issues such as anti-social behaviour (ASB), waste management, and property upkeep more effectively.
Parking conditions	*All cars relating to HMOs should have their own off road designated parking place, HMO properties should not be able to park on the public highway (three or more cars trying to park in relation to one property when there is limited road space is unacceptable).*	Consultation survey comments	While the council understands the frustration caused by parking issues, it is not feasible to impose conditions to limit the number of vehicles per property or require off-street parking, as such restrictions exceed the legal scope of the Housing Act 2004 and the licensing regime. Parking considerations are however taken into account when an owner applies for planning permission to convert a property into an HMO. However, monitoring and enforcing vehicle limits or off-street parking requirements would be highly challenging. It would necessitate significant resources and continuous oversight, which are not currently available.
	I would like to see enforceable conditions placed on HMOs without off street parking that tenants cannot have access to parking permits.		
	Hmo should not have parking permits to discourage car ownership and help the environment.		
	Traffic should be also part of the consideration HMO causes far too much traffic, parking on pavements so much that children have to walk to school in the road.		
More conditions required	*Any new HMO applications should include compulsory fitting of renewable energy and energy efficiencies, such as solar and heat pumps.*	Consultation survey comments	The Housing Act 2004 specifies mandatory conditions that must be applied to all licences. The council can only impose other discretionary conditions in order to deal with the

Theme	Example comment	Comment source	Council response
	All plans to convert houses to HMOS Should have heat pumps and solar panels to reduce carbon emissions.		management, use and occupation of the licensed property and additionally for HMOs its condition and contents. Whilst the council appreciates the request to include other licence conditions these fall outside the scope of the Housing Act 2004 and cannot be included.
	Maintenance of the exterior of properties. Paint, front gardens. Chatham and parts of Gillingham are an eyesore! External property maintenance should be mandatory with fines for non compliance.		
	They don't go far enough. A fire alarm being tested automatically from a panel does not mean it will be guaranteed to detect smoke after 5 years of operation! It should be tested yearly and I never seen a single fire safety person in the whole 5 years I been here but according to council that is fine????		
	Landlords should be expected to say how they will address solar gain or effects contributing towards overheating		
	Excess heat and proper ventilation need to be covered		
	Damp is an enormous problem, people living in poorly insulated properties		

3.2 Fees, discounts and the financial impact of the schemes

Theme	Example comment	Comment source	Council response
Cost of licence fee	*Good landlords will be penalised with the cost of the license fee.*	Consultation survey comments, Public Forum Q&A, Safeagent letter, Propertymark letter	The proposed fee has been calculated based on the cost of setting up and operating the licensing schemes. The aim is to ensure that the costs are covered by the expected income from the number of licence applications that the council anticipates under the proposed designations. Councils are not permitted to make a profit from licensing schemes and careful consideration and financial modelling has gone into the licence fees and discounts. A selective licence obtained without any discounts will cost a one-off fee of £840 for a 5-year licence, which equates to less than £3.25 per week. An additional HMO licence obtained without any discounts will cost a one off-fee of £1,600 for a five-year licence, which equates to less than £6.20 per week. The council has also elected to offer a number of discounts to eligible landlords in order to reward and incentivise high property management standards. Whilst the council recognises that the licence fee is a cost to the landlord, this is not considered unaffordable compared to the average rental income obtainable in Medway at present. According to ONS the average monthly rental price in Medway is currently £1,238[1], meaning the selective licence fee would represent around a 1 per cent reduction in rental revenue for the average property and additional HMO
	Payment up/front feels like robbery.		
	The accredited estate agent ensure compliance with all legal requirements; so why would a license fee be applicable in this case other than an income stream for the council!		
	Not happy to pay £840 per property. I keep to the rules at all times, now feel I am punished for doing everything a landlord needs to do.		
	We note the proposed fees of £840 (selective) and £1,600 (additional). These sums will place a considerable financial burden on landlords that, together with the cost of compliance, may result in a disincentive to continued investment in the PRS.		
	The proposed licence fees set out by Medway Council represent a significant financial burden in the current economic climate, where landlords are		

[1] https://www.ons.gov.uk/visualisations/housingpriceslocal/E09000016/#rent_price

Theme	Example comment	Comment source	Council response
	already facing increasing costs associated with mortgage rates, maintenance, and regulatory compliance. In particular, the proposed selective licence fee of £840 per property and the additional HMO licence fee of £1,600 per property are substantial, especially for smaller landlords operating on limited margins.		licence fee around a 2 per cent reduction in rental revenue for the average property. The proposed selective licence fee is broadly comparable with those charged by other local authorities operating selective licensing schemes. Benchmarking undertaken against comparable authorities indicates that Medway's proposed fee sits within the range commonly charged for similar schemes and reflects the costs associated with administering, monitoring and enforcing a discretionary licensing scheme. The proposed additional HMO licence fee is also broadly comparable with those charged by local authorities operating additional licensing schemes. Benchmarking against comparable authorities indicates that Medway's proposed fee is within the range commonly charged for additional HMO licensing and is not considered atypical when compared with similar schemes elsewhere. The Council therefore considers both proposed fees to be fair, reasonable and proportionate. The fees have been calculated on a cost-recovery basis and are intended to ensure that the licensing schemes can be administered and enforced effectively whilst minimising the financial burden on landlords. The council acknowledges concerns regarding wider financial pressures on landlords, including rising mortgage rates and maintenance costs. However, the licensing scheme is intended to ensure that all privately rented properties

Theme	Example comment	Comment source	Council response
			meet minimum safety and management standards, which benefits tenants, responsible landlords, and the wider community. The council is committed to ensuring the fees are fair and proportionate, and they will be reviewed throughout the schemes to ensure this remains the case.
Costs of implementing the scheme and value for money	*Neither my tenants or I will receive any benefit from the selective licensing scheme as proposed.*	Consultation survey comments, Propertymark letter	The council recognises concerns regarding the cost of implementing the proposed licensing schemes and the value they represent. The licence scheme is designed to be cost neutral and will not make a profit; the fee has been designed to be as low as possible whilst ensuring the cost of the licensing scheme is covered. Value for money should be considered in terms of the wider outcomes the scheme is intended to deliver, including improved housing conditions, stronger management standards and more effective management of issues such as ASB. Existing powers are largely reactive and dependent on complaints, whereas licensing provides a proactive mechanism to identify properties, engage landlords and address issues at an earlier stage. Licensing also supports a more targeted and efficient approach to enforcement, enabling the council to identify unlicensed properties and focus resources on non-compliant landlords. The licence fees reflect the level of activity
	The Fee shows this is not about safer housing just a way for councils to make up funding shortage falls the tenants will pay in the end		
	Properties were never inspected and it was just a way for councils to make money out of licensing fees with no follow up.		
	As a person that have lived where this types of proposals have been introduced, council are just using it for cash cow and don't really care about the tenant or improving the standard of properties rented. The council already have powers to make sure landlord improves qualities of property rented without making landlord doling out extra funds for this licences, except the licence is for free which I really doubt it will be.		
	It is important that Councillors carefully consider whether such an extensive scheme offers genuine value for money for 2 Renters' Rights Act 2025 3 Private Sector Licensing - (Additional & Selective Licensing Schemes) 3 residents and whether it represents the most efficient and cost-effective		

Theme	Example comment	Comment source	Council response
	mechanism to achieve improvements within the PRS.		required to deliver these outcomes and are proportionate to the scale and objectives of the scheme. The council acknowledges that not all respondents consider that they will directly benefit from the scheme. However, the approach is intended to deliver improvements in housing quality and neighbourhood conditions, benefiting tenants, responsible landlords and the wider community across Medway. The operation and impact of the scheme will be kept under review to ensure it remains effective and proportionate.
Money making schemes	*Yet to see any change or evidence to support how licencing does anything other than generate revenue for the local authority and create jobs internally to handle the additional bureaucracy rather than enforce all the powers you currently hold.*	Consultation survey comments	Under the law, the council is not allowed to make money from the licensing schemes. The proposed fees have been calculated based on the cost of setting up and operating the licensing schemes, so that the costs would be met by the expected income from the number of licence applications the council anticipate, under the proposed designations. The fee will be kept under annual review to ensure the schemes remain cost neutral.
	This sounds just like another money making scheme for the council and unless there is actual evidence of any significant measures already taken against poorly performing landlords, these current proposals will have zero effect!		
	Licencing is about making for money for the council.		
Increased financial pressure on landlords	*We are not wealthy landlords living in a mansion with gold plated entrance gates, this is our pension, and it is now close to the point we are considering selling up and investing into other*	Consultation survey comments	We are mindful of financial pressures that landlords may currently be under. Landlords are encouraged to claim reasonable business expenses related to rental properties

Theme	Example comment	Comment source	Council response
	markets which don't have huge taxes and increasing costs involved.		which may help reduce your tax bill. The costs of licence fees can be claimed against annual tax bill. The council is proposing a number of discounts and support measures for property improvements. These measures aim to minimise the financial strain facing landlords while maintaining fair and safe housing standards for tenants.
	Impact on Rental Viability: Given the rising costs of maintenance, mortgage interest rates, and tax changes, many landlords are currently operating with thin margins or at a loss.		
	This will lead to more private landlords leaving the area, higher costs for tenants and fees to you where you feel advantage can be taken of a landlord's business.		
Excessive burden	*They create a bureaucratic costly burden on good landlords while not changing the condition of properties or the situation of tenants except perhaps to put up their rent, while likely being ignored or evaded by the rogue landlords that need to be dealt with.*	Consultation survey comments	The council considers the proposed licence conditions to be comprehensive but not excessive. Many of the conditions are mandatory by law and must be included on all licences, which is beyond the council's control. The licence conditions are not intended to place an unfair burden on landlords; they are intended to ensure that private rented properties meet essential safety standards. By adhering to these conditions, landlords can provide safe, habitable, homes for tenants, ultimately benefiting both landlords and the community.
	The administrative burden of a blanket scheme does little to deter those who already operate outside the law.		
	The council is just adding another financial burden on landlords.		

Theme	Example comment	Comment source	Council response
	While I appreciate the council's aim to improve housing standards, these measures place significant financial and administrative burdens on landlords, particularly smaller landlords who already face rising costs.		The council acknowledges that landlords are subject to existing regulations and laws. However, the existing regulations and powers do not require landlords to declare themselves to the council. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months.

Theme	Example comment	Comment source	Council response
Cost of raising standards of older properties	*it would be helpful for Medway Council to clarify whether any financial support mechanisms are available such as grants, loans, or energy efficiency funding to assist landlords in meeting the expected standards, particularly those operating within the private rented sector and managing older housing stock.*	Propertymark letter	The council recognises the challenges associated with upgrading older properties, particularly in relation to meeting energy efficiency standards. While the council does not currently offer grants specifically targeted at supporting landlords to improve older housing stock, we note that only 3.7% of PRS properties in Medway fall below the current Minimum Energy Efficiency Standard (MEES) of EPC rating E. We encourage landlords to explore national funding opportunities and schemes that may be available to support energy efficiency improvements. Where possible, the council will continue to signpost landlords to relevant resources and provide guidance on compliance with MEES regulations. We remain committed to working collaboratively with landlords to improve housing quality across Medway, while being mindful of the financial pressures involved.
Additional costs will be passed on to tenants	*From a small responsible landlord's perspective (I am only involved in one let properly) the outcome of a licensing scheme will either be a) an increase in rent to cover the license fee and administrative costs (particularly as small landlords will probably use a professional letting agent to meet the license requirements), or b) sell the property as the challenges of being a small landlord will no longer be worth it.* *These additional costs—whether through licence fees, compliance requirements, or administrative*	Consultation survey comments	From administering the current mandatory HMO licensing scheme, the council has seen no evidence that landlords have increased rents to cover their licence fee costs or that landlords have moved elsewhere. This is supported by the findings from the many other councils in London and the South East that run discretionary property licensing schemes (selective and/or additional) and have no evidence to support that licensing has pushed landlords out of the rental market.

Theme	Example comment	Comment source	Council response
	burden—are inevitably passed on to tenants through higher rents.		If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can be challenged by the tenant via the Residential Property Tribunal.
	The reduced supply leads to increased rents and the landlords additional costs add further to the rent increase.		
	I have kept my rent at a reasonably low rate to support my good tenants, so maybe will have to increase these to cover these further costs.		
Effect on rental supply	*Introducing further restrictions may discourage landlords from continuing to operate in the market, reducing the overall supply of rental properties, which could drive up rents and limit options for tenants.*	Consultation survey comments, Public Forum Q&A Propertymark letter	From administering its current HMO mandatory licensing scheme, the council has seen no evidence that landlords have increased rents specifically to cover their licence fee costs. Findings from local authorities operating discretionary property licensing schemes (selective and/or additional) are broadly consistent. Many London boroughs and councils elsewhere in England which operate such schemes have reported no evidence that licensing has resulted in landlords leaving the PRS. If a landlord decides to increase the rent for their property, there are procedures which must be followed and any increase above market rents levels can be challenged by the tenant via the Residential Property Tribunal.
	This would reduce the supply of affordable housing for working-class and low-income residents who rely on the private rental sector for basic accommodation.		
	Reduced Housing Supply: If the cost and administrative burden of licensing force good landlords to sell their properties, the local rental market will shrink.		
	Are the council not concerned selective licensing will increase homelessness as good landlords will leave the PRS due to the scheme		
	Exiting the market is especially a concern for smaller landlords who are more likely to sell their properties and further shrink the supply of much sort after PRS properties leaving remaining private tenants with higher rents. Our research on the shrinkage of the PRS6 found 53% of buy to let		

Theme	Example comment	Comment source	Council response
	properties sold in March 2022 left the PRS and that there were 49% less PRS properties to let in March 2022 compared with 2019.		
Impact on low-income families	*This would reduce the supply of affordable housing for working-class and low-income residents who rely on the private rental sector for basic accommodation.*	Consultation survey comments, Propertymark letter	The council recognises concerns regarding the potential impact of licensing on low-income households and those reliant on the PRS for affordable accommodation. It is acknowledged that affordability pressures are significant and that any additional costs may be felt more acutely by these groups. The proposed licence fees represent a relatively small proportion of average rental income when spread over the five-year period of the scheme. However, the council recognises that even small cost increases may have an impact for households on lower incomes. Evidence from other authorities operating discretionary licensing schemes has not identified a direct link between licensing and sustained rent increases above market levels. The council considers that improved housing quality, safety and management standards delivered through licensing are likely to provide the greatest benefit to more vulnerable residents, who are disproportionately affected by poor housing conditions. The council will monitor the impact of the scheme on affordability and housing supply as part of its ongoing review.
	I'm a 55yr old grandad, im currently struggling to find a home, im disabled and cannot work but HMO accommodation is riff and consumed the market and has pushed the rents up beyond alot of people's affordability.		
	Given the demographics of those accessing the private rented sector in Medway, there is a genuine risk that continued cost pressures could reduce affordability and place additional pressure on low-income households across the borough.		

Theme	Example comment	Comment source	Council response
Burden on and discounts/exemptions for small and occasional landlords	*There were no discounts for private landlords with only a single rental property — why?*	Consultation survey comments	This has been considered but is not practical in application. Ultimately all landlords have the same responsibilities when letting a property be it for six months or six years, and irrespective of how many properties they own. It is crucial to maintain consistent standards across the whole sector. However, in common with all landlords, those landlords with fewer properties are able to take advantage of any number of the six discounts the council has proposed, and we would encourage all landlords to do so.
	It is unreasonable to expect landlords who rent out one or two properties to comply with the same level of regulation as large scale landlords with extensive portfolios.		
	I am concerned that the fee level and administrative burden, applied broadly across seven wards, will accelerate the exit of smaller compliant landlords from the market.		

3.3 ‘Good’ landlords and collaboration

Theme	Example comment	Comment source	Council response
Negative impact on good landlords	*The scheme imposes an unjustified financial and administrative burden on compliant landlords, including those already meeting high professional standards.*	Consultation survey comments	The council understands that many landlords who rent out properties in the private sector manage their properties responsibly. However, the evidence shows that Medway is experiencing large scale issues in the PRS with poor housing conditions. The council’s intention is to use the regulatory framework provided by additional and selective licensing schemes to focus on those that do not comply and impact negatively on the reputation of those responsible landlords as well as having a detrimental effect on tenants and neighbourhoods. Non-compliant landlords will be subject to more scrutiny and put to greater cost than responsible, compliant landlords as they will be given a reduced-term licence. Furthermore, we will use robust enforcement against wilfully non-complaint landlords to ensure PRS properties are protected by the licensing scheme. We will develop guidance and work with landlords to bring about compliance where possible, but we will also use robust enforcement against wilfully non-compliant landlords, creating a level-playing field for responsible landlords. As is outlined within the consultation supporting documents, licensing schemes are expected to deliver benefits for good, compliant landlords as the neighbourhoods in which they have properties improve and they are offered support in
	Requiring these compliant owners to pay substantial licensing fees functions as an additional "tax" on responsible housing provision.		
	If the council has already identified poorly performing wards/landlords - do something about them rather than impose fees on already good landlords.		
	We feel it is always the good Landlords that are vilified.		
	I feel very strongly that decent landlords should not be bearing additional cost due to the council not being able to deal directly with the mindless minority		

Theme	Example comment	Comment source	Council response
			managing their properties effectively, including the enforcement of tenancy conditions to combat neighbourhood nuisance caused by tenants or people visiting their properties.
Target rogue landlords	*Instead of a costly universal scheme, the council should focus its existing enforcement powers and resources directly on identifying and prosecuting bad actors who violate established health and safety regulations.*	Consultation survey comments, Safeagent letter	If the schemes are approved, the council will carry out inspections to find unlicensed properties and will take action against those who refuse to licence their properties. An independent agency on behalf of the government (An Independent Review of the Use and Effectiveness of Selective Licensing)[1] found that licensing "provides a clearly defined offence (licensed / unlicensed) which simplifies enforcement - and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences". Notably, in many cases, landlords may not be compliant as they are not aware of the legal requirements for or issues within their properties, and not because they are actively disregarding legislation. Licensing helps the council to work with all landlords to ensure a high standard of management and maintenance through education and collaboration. The council believes that licensing will enable them to work with landlords to raise standards of living in Medway and work to tackle the issues of poor housing conditions, by holding landlords to a high standard, and by carrying out inspections.
	I support proportionate regulation and enforcement against genuinely poor or criminal landlords.		
	A more effective approach would be for the council to focus on targeted enforcement against non-compliant landlords, provide support for property upkeep, and work with local authorities to address tenant behavior and community issues directly, rather than imposing broad additional conditions on all licensed HMOs.		
	Rogue landlords are unlikely to register for a license voluntarily.		

Theme	Example comment	Comment source	Council response
	The highest priority should be tackling rogue landlords and agents. *Many rogue landlords and unaccredited agents operate under the radar. Resources should, therefore, be directed towards these serious cases. There is danger that too much time will be spent on those properties and landlords where an existing, reputable agent is best placed to ensure compliance with license conditions.*		Alongside the enforcement powers granted by licensing, the council will also carry out a communications campaign to make landlords, tenants and residents aware of the licensing schemes, and raise awareness of how to report issues. 1-Selective licensing review - GOV.UK
Work collaboratively with landlords	*Encouraging collaboration between landlords and the council to share best practices and improve property management.*	Consultation survey comments	The council is committed to providing robust support for landlords, and we have several measures already in place to ensure this. Our guidance for landlords, available on the council's webpage, provides comprehensive information and advice to landlords to support them in meeting their obligations when letting a property. It is the council's intention to use the regulatory framework provided by licensing to work with and educate landlords to bring about compliance, rather than take immediate enforcement action where non-compliance is found. We particularly encourage landlords to become accredited to increase their professionalism in managing their properties. Through accreditation, landlords are able to achieve a level of knowledge and competence before letting a home, which is key to raising standards in the PRS.
	Working collaboratively with landlords to raise standards without discouraging participation in the rental market		
	Additionally, providing clearer guidance and support for landlords—alongside education initiatives for tenants about their rights—could help raise standards without introducing further layers of bureaucracy.		
	A more collaborative, efficiency-focused approach would deliver better outcomes for all stakeholders.		

Theme	Example comment	Comment source	Council response
			The council will continue to provide landlords with detailed guidance on their legal obligations and responsibilities, both online and in person landlord forums.

3.4 Anti-Social Behaviour (ASB)

Theme	Example comment	Comment source	Council response
Landlords' responsibilities for dealing with ASB and other tenant behaviour issues	*Landlords should not be solely held responsible for tenant behaviour, and the council could play a stronger role in discouraging anti-social activity through fines, monitoring, and community initiatives.*	Consultation survey comments, Safeagent letter	The council understands that it is the responsibility of all residents in Medway not to partake in ASB. The council does not expect landlords to be solely responsible for the behaviour of their tenants, but the council would expect landlords to meet the proposed licence conditions, which lay out how to help address issues with ASB in licensed PRS properties. The council will work with landlords who are experiencing issues with tenants to address issues of ASB, including guidance on how to manage ASB caused by tenants. The council would encourage landlords to include clauses in their tenancy agreements about ASB, and to manage their tenancies and ensure that ASB caused by their tenants is effectively addressed and, if necessary, appropriate action taken. The licence conditions set out the actions that landlords should take to demonstrate that they are dealing with ASB associated with their properties. Evidence presented to the council may be used in claims for possession. The council's (ASB) officers will work in partnership to support landlords in dealing with tenants causing ASB.
	I think that tenants should be held to some responsibility, the majority of landlords I know keep excellent properties and well managed but tenants tend to have no regard for property, even their own		
	In my opinion they have the mindset that, as the property does not belong to them, they do not need to look after it as an owner would or behave in a respectful manner.		
	If Landlords attempt to Manage Anti-Social Behaviour this raises health & safety issues. Such issues should be referred to and dealt with by the Police.		
	The causes of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.		

ASB and overcrowding	*If a landlord is irresponsible and allowing overcrowding, then the necessary laws should be followed. The original lease agreements for flats should have legal requirements highlighted within the documentation.* *Do not give out HMO licenses to encourage overcrowding to start with.* *Landlords lack the expertise to handle antisocial behaviour and are not equipped to address tenants' mental health issues or substance abuse problems. If a tenant is causing issues and the landlord decides to terminate the tenancy, they believe they have fulfilled their responsibilities, even if the tenant is struggling with these issues. This simply shifts the problem to elsewhere in the area, potentially leaving the tenant neglected or vulnerable to unscrupulous landlords, impacting other residents negatively.* *Additionally, overcrowding poses a challenge for landlords when tenants exceed the property's capacity. Landlords are responsible for informing tenants about occupancy limits and prohibiting subletting or additional occupants. What information and support can the council provide to support landlords in such situations?*	Consultation survey comments, NRLA letter	The council believes there are steps that landlords can take to determine if a property has been sublet or overfilled. Additional HMO licence condition 16.2 requires that *'inspections of the HMO are carried out at least every three months to identify any problems relating to the management, use and occupation of the HMO and its condition and contents'* and selective licence condition 12.5 requires that *'inspections of the house are carried out at least every six months to identify any problems relating to the condition and management of the house'*. As stated above, the council will work in partnership to support landlords in dealing with tenants causing ASB.
Environmental crime	*Fly tipping should be sorted by the homeowner rather than the council to help prevent it.* *Issues such as noise, litter, or damage often require active policing, community support, and enforcement by the council.*	Consultation survey comments	While it is not always possible to identify individual perpetrators of fly tipping, the licensing framework enables the council to engage directly with landlords and managing agents to ensure that adequate waste storage facilities are provided, tenants are informed of their responsibilities, and

	Including an objective focused on neighbourhood quality could help emphasise the importance of maintaining property exteriors, gardens and boundaries, as well as ensuring appropriate waste storage and bin presentation.		waste management arrangements are clearly documented and monitored. This proactive approach contributes to a reduction in repeat waste-related incidents associated with licensed properties. We fully acknowledge that landlords cannot be held responsible for actions beyond their control. However, through licensing, they are well positioned to set clear expectations, maintain appropriate property standards, and work collaboratively with tenants to prevent environmental issues. The council's objective is not to assign blame, but to promote shared responsibility and improve the overall quality and cleanliness of neighbourhoods.
	Clear and accessible reporting routes for concerns relating to property condition, waste management or anti-social behaviour could help the council identify problems earlier and support more targeted enforcement.		

3.5 Administration of the proposed licensing schemes

Theme	Example comment	Comment source	Council response
Council capability	*Many landlords are already experiencing delays and inconsistencies—for example, extended waiting times for HMO licence processing and renewals.*	Consultation survey comments, Public Forum Q&A	If the schemes are approved, the council will enhance its enforcement capability proportionally to the number of licences anticipated. This forms part of the financial modelling of the schemes and includes implementing a recruitment and retention policy to manage the increased capacity needed for administration and enforcement of the schemes. Within the new scheme objectives, we have set ourselves challenging targets. Resources shall be prioritised to effectively deal with the properties of most concern and target enforcement actions to those landlords who fail to license their properties and/or breach licence conditions. The council will actively inspect for unlicensed properties and take action against those who refuse to license them. Proactive licence compliance inspections will also be conducted, and robust enforcement measures will be used against landlords who are wilfully non-compliant.
	No point in having any form of licence unless there is a proper team who inspect and follow up on properties.		
	The council need to have a proper system in place for inspecting, renewing licences and time lines for repairs to take place.		
	Does council have resources to inspect 12,000 properties? It will take years to inspect all of them		
Delivering effective enforcement	*It is also likely that the poor landlords will largely ignore or evade the licensing requirements unless the Council employs a significant team of inspectors and is willing to pursue, and bear the cost of, legal action to enforce the scheme.*	Consultation survey comments, Safeagent letter	The council agrees that efficient enforcement and proactive inspections are fundamental to the success of any scheme. That is why the financial model underpinning the schemes build in enforcement and inspection officers ensuring that visits to PRS properties are routinely conducted, and appropriate enforcement action is taken where necessary.

Theme	Example comment	Comment source	Council response
	Clear and accessible reporting routes for concerns relating to property condition, waste management or anti-social behaviour could help the council identify problems earlier and support more targeted enforcement.		While the council remains committed to an educational and supportive approach - particularly for landlords who are willing to comply - we will not hesitate to take firm action where there is clear and wilful non-compliance. This dual approach ensures that risk within the PRS is managed effectively, and that tenants living in PRS properties are afforded the protections the licensing scheme is designed to deliver.
	Deal effectively with the complaints you receive.		
	Robust enforcement will be essential to the success of any licensing scheme. Tenants will need to be confident that any enforcement action required has been (or soon will be) carried out in respect of all licensed properties.		
Council should focus on targeted, intelligence-led enforcement	*A more effective approach would be for the council to focus on targeted enforcement against non-compliant landlords, provide support for property upkeep, and work with local authorities to address tenant behavior and community issues directly, rather than imposing broad additional conditions on all licensed HMOs.*	Consultation survey comments	The council will develop and follow a targeted plan to ensure enforcement is carried out effectively and efficiently, including prioritising streets with high numbers of privately rented properties likely to be experiencing Category 1 hazards and repeat ASB. The council agrees that intelligence-led and targeted enforcement is an important part of improving standards in the PRS and will continue to use a range of data sources, complaints, inspections and partnership working to identify properties and landlords presenting the greatest risk. The evidence gathered as part of the feasibility study indicates that poor property conditions and management issues are not limited to a small number of known properties. Licensing provides the council with a proactive mechanism to identify and engage with landlords and properties that may not otherwise come to its attention.
	A targeted system based on feedback from tenants, residents and council staff would be better.		
	If the council has already identified poorly performing wards/landlords - do something about them rather than impose fees on already good landlords.		

Theme	Example comment	Comment source	Council response
			The council intends to take a risk-based approach to enforcement, focusing resources on properties presenting the greatest risks to tenants and communities, including those associated with Category 1 hazards, poor management practices and persistent ASB. Licensing will support this approach by providing better intelligence on the PRS and supporting earlier intervention where problems are identified.
Use existing regulations and powers	*Local authorities already possess extensive enforcement powers under the Housing Acts and the HHSRS to identify and address poorly managed private rented properties.*	Consultation survey comments, NRLA letter	The council have considered a range of alternatives to selective and additional licensing, but do not believe they are as effective in dealing with poor property conditions and ASB in Medway. The current powers the council has, including the use of the Part 1 Housing Act 2004, do not require landlords to declare themselves. This means there is no obligation for landlords to make their properties known to the council or to be proactive in improving conditions, including minor issues (that may still pose a health and safety risk) but still need to be addressed, but which a tenant may not complain to the council about. Formal action under the Housing Act can be a slow process, and improvements to properties can take many months. In most cases it requires the council to serve a notice and it is only if that notice is not complied with, that the council can then take enforcement action. In relation to the NRLA's Freedom of Information (FOI) request, the council notes that the FOI only requested data
	Many of the proposed discretionary conditions appear to duplicate existing legal obligations that responsible landlords already comply with		
	Instead of a costly universal scheme, the council should focus its existing enforcement powers and resources directly on identifying and prosecuting bad actors who violate established health and safety regulations.		
	How can this proposal claim to support responsible landlords while simultaneously penalising them with additional financial pressures and regulatory burdens? It is fundamentally contradictory. Local authorities already possess extensive enforcement powers under the Housing Acts and the HHSRS to identify and address poorly managed private		

Theme	Example comment	Comment source	Council response
	rented properties. These powers are not theoretical—they are effective when properly used. I know this firsthand from my time as a Housing Enforcement Officer in the private rented sector at Croydon Council prior to lockdown. I inspected hundreds of properties, and the overwhelming majority were well maintained. Rather than imposing further blanket measures that disproportionately impact compliant landlords, the focus should be on robustly applying—and, where necessary, strengthening—the enforcement tools that already exist, particularly in light of the new RRA. The issue is not a lack of legislation, but a failure to fully utilise it.		for the years 2023/24 and 2024/25. Medway Council has issued 26 fixed penalty notices (FPNs) in the year 2025/26 to date, bringing the total number of FPNs issued since 2023/24 to 33. These figures evidence a significant increase in enforcement activity in recent years, demonstrating the council's commitment to using all available enforcement powers to improve standards and address non-compliance within the PRS. Licensing will enable the council to address issues in the PRS more proactively than relying solely on existing regulations.
	The council possesses a variety of housing enforcement legislation that can be used to address substandard conditions in the PRS, including the Housing, Health, and Safety Rating System (HHSRS). These enforcement powers are currently at the disposal of the local authority and do not necessitate consultation prior to implementation.		

Theme	Example comment	Comment source	Council response
	In the response to our FOI, Medway Council stated they have issued a total of 7 civil penalties in the years 2023/4 and 2024/5. Zero civil penalties were issued in the year 2023/4. This failure to effectively use existing enforcement powers to deal with rogue landlords, whilst placing further burden on compliant landlords, does not contribute to a healthy and thriving PRS in Medway. (NRLA)		
Renters' Rights Act	*There are now hefty fines available to the local authority for landlords that don't comply with the Renters Rights Act, that should be sufficient.*	Consultation survey comments, Propertymark letter	The council has carefully considered the new powers introduced by the Renters' Rights Act, which came into effect in May 2026. While the phased implementation of the Renters' Rights Act will provide local authorities with valuable new tools, like the property portal, it is not a substitute for an additional HMO or selective licensing scheme. Additional HMO and selective licensing provide a locally tailored, systematic approach to improving housing standards. They are more than just a collection of information; they are a proactive means for local authorities to inspect privately rented housing without the need for tenant complaints. This facilitates targeted action where it is needed most, ensures property managers are fit and proper persons, and protects vulnerable tenants. The property portal will aid in the identification of unlicensed properties and inform landlords about local activities. However, it will not directly improve property conditions and management. Certificates will still need to be checked for
	Why do council need to double up on what is already covered by renters rights act?		
	I am concerned that additional regulation, particularly following the significant changes already being introduced through the Renters Reform Bill, will discourage more landlords from remaining in the private rented sector.		
	The new Renters Rights Act will help marginally but rogue landlords still have a range of 'illegal' tactics they will use to remove Tenants who report issues.		

Theme	Example comment	Comment source	Council response
	Furthermore, the proposed schemes risk duplicating elements of the forthcoming national landlord registration system expected under the Renters' Rights Act2 , and the Council should carefully consider how its proposals align with emerging national reforms.		accuracy, and landlords can opt out of receiving notifications from the portal, limiting its impact. Government guidance[2] on the Act states: *Selective licensing remains a valuable tool when used appropriately and combined with other measures. It enables local authorities to target the improvement of standards and safety in areas suffering from issues such as poor housing quality, high levels of deprivation and anti-social behaviour. It has the ability to drive better outcomes for local residents, tenants and responsible landlords.* *Our plans to deliver a Database will provide access to information about privately rented properties and tackle one of the biggest and most time-consuming barriers faced by local councils when enforcing standards – identifying poor quality and non-compliant properties and who owns them.* *We will work with local councils to gather more information about their selective licensing schemes to ensure the schemes are continuing to deliver the intended outcomes.* In conclusion, while the portal and other parts of the Renters' Rights Act will provide a valuable source of information on the sector, additional HMO and selective licensing schemes are still necessary. They ensure effective regulation and improvement of the private rented sector, providing a comprehensive solution that addresses the unique challenges of each local authority area. The Council supports the

[2] https://www.gov.uk/government/publications/guide-to-the-renters-rights-act

Theme	Example comment	Comment source	Council response
			implementation of both tools in tandem to achieve the best outcomes for landlords, tenants, and local communities.
Public register	*Have a public register to show the rented properties in an area who they are owned by and how to get in touch with the owner if issues are found.*	Consultation survey comments, Public Forum Q&A	It is a legal requirement for the council to maintain a public register of all licensed properties in Medway. In addition to the existing register for mandatory HMOs, a public register will also be maintained for properties licensed under the selective and additional licensing schemes. This will ensure transparency and allow residents, tenants and other stakeholders to access information about licensed properties across the PRS in Medway. You can view the redacted version of the licensed HMO properties register on Medway's website HMO Public Register - redacted Information about private landlords and letting agents who have been prosecuted or fined can be found by searching the Mayor of London's Rogue Landlord and Agent Checker. This contains information about landlords and agents who have been: • prosecuted or fined by London boroughs for housing-related offences; • prosecuted by the London Fire Brigade for fire safety offences; • expelled by one of the agency redress schemes.
	If the council just wants a register of landlords then that should be free but I don't think that is the case here - rather it is an income stream which can be increased as the council wish for no benefit to either tenants or landlords.		
	Will the details of licence holders be published on an open register, or will that information be restricted to council officers?		
Complaint reporting methods	*This could include clear guidance for tenants, neighbours and other local residents on how to report issues such as property condition, waste*	Consultation survey comments	There are a number of ways for tenants to get in touch with the team to report properties they are concerned about, or specific issues with a property. This includes a dedicated

Theme	Example comment	Comment source	Council response
	management or anti-social behaviour linked to licensed properties. *Making reporting routes clear and accessible could help the council identify problems earlier and support the effective operation of the scheme.* *Finally, clear guidance on how tenants, neighbours and other residents can report concerns about licensed properties could help support the effective operation of the scheme and allow issues to be identified and addressed earlier.*		email to report issues, a licensing telephone line to speak to officers and an online reporting form on the council's website. Advice for private tenants – Medway Council The council is committed to addressing complaints and will maintain this commitment within the framework of the licensing schemes. However, the current process of reacting to complaints relies on complaints being made to the council and does not encourage landlords to be proactive. The council believes that a proactive approach will have a greater impact on improving property conditions and will increase the awareness of tenants of acceptable standards in privately rented properties.
Transparency and accountability in licensing outcomes	*It may also be helpful for the council to publish periodic updates on the operation of the scheme, including information on inspections carried out, enforcement action taken, and overall progress in improving standards.* *Including such an objective would help demonstrate whether the schemes are achieving their intended outcomes and provide reassurance to residents and responsible landlords that the schemes are being actively implemented and enforced.*	Consultation survey comments, Public Forum Q&A, Safeagent letter, Propertymark letter, NRLA letter	We agree that transparency and accountability are essential to building trust and demonstrating the value of the scheme to all stakeholders, including landlords, letting agents, tenants, and the wider community. The council is committed to monitoring the impact of the scheme and recognises the importance of sharing this information in a clear and accessible way. In accordance with the Housing Act 2004, we will review the operation of any designation made from time to time. In line with best practice guidance set out in the Selective Licensing

Theme	Example comment	Comment source	Council response
	Given that the HMO licensing scheme has been in place since 2020, what evidence does the Council have as to the effectiveness of such schemes, given that from 600 inspections, only 30 civil penalties have been issued (0.05%)?		General Approval, we will publish the outcome of any reviews undertaken on our website.
	We believe that regular information on implementation of the scheme should be made available in a clear and consistent format.		
	Transparency regarding the full financial impact of licensing is vital to allow residents, landlords, and stakeholders to assess whether the scheme has delivered measurable improvements in housing standards that justify its considerable expense.		
	If the proposed scheme is approved and put into action, the council should provide an annual summary of outcomes to showcase the improvements in tenants' and landlords' behaviour and the impact of licensing on the designated area throughout the scheme's duration. This would enhance overall transparency.		

3.6 General comments about the licensing scheme proposals

Theme	Example comment	Comment source	Council response
Uneven application across Medway	*i feel it should be implemented in all wards not just the seven proposed wards otherwise bad housing will increase in the other wards and more HMO will be built in the the other wards.*	Consultation survey comments	The council can only introduce selective licensing in areas where there is evidence that the area meets the criteria as laid out in section 80 of the Housing Act 2004 and the Selective Licensing of Houses (Additional Conditions) (England) Order 2015. The council carried out a detail analysis of the PRS and, guided by the evidence, the council has been selective in proposing which wards would be covered by the scheme. The evidence supported a selective licensing scheme based on poor property conditions in 7 out of 24 wards. The council will continue to monitor those wards not included in the selective licensing scheme and should the evidence change then consideration will be given to introducing a third designation.
	While the wards targeted are prone to this issue, the scene should be rolled out over all of Medway. The council should also require all PRS landlords to be licensed.		
	I believe it should cover the whole of Medway as you will be creating more popular areas for Landlords otherwise.		
	All of this licensing and control should be implemented across the entire borough.		
Evidence base flawed	*On the Council's own evidence, the scale of the issue does not justify the breadth of the proposed scheme.*	Consultation survey comments	Metastreet's Tenure Intelligence (Ti) methodology is clearly outlined at page 58 of the Housing Stock Condition and Stressors report (Consultation Evidence Pack Appendix 1). Ti uses a wide range of local and national datasets and machine learning in combination with expert housing knowledge to accurately predict a defined outcome at the property level. Council and external data have been assembled as set out in Metastreet's data specification to create a property data
	The Council's figures are derived from predictive modelling, with acknowledged limitations in		

Theme	Example comment	Comment source	Council response
	accuracy (approximately 67–71%), rather than comprehensive inspection data.		warehouse. This includes various data sources and is not based solely on where 'action' has been taken by the council. All results have been carefully analysed by skilled practitioners Predictive modelling has been used in this field for almost 20 years specifically for the purpose of understanding housing stock condition as required by Housing Act 2004 Part 1, section 3. Many councils have progressed to using modelling to understand whether areas would benefit from property licensing, support the introduction of property licensing and increase property licensing compliance. The council considers that this approach provides a proportionate and evidence-based method for identifying areas where poor housing conditions are likely to be most prevalent, particularly where full inspection data is not available. The data used to inform the assessment is not limited to enforcement activity or complaints received by the council but incorporates a wider evidence base, including local authority data and external sources, which have been analysed and quality assured by experienced practitioners. The results have been reviewed alongside local knowledge to ensure they provide a reliable basis for decision-making. The council is satisfied that the evidence base meets the statutory requirements of necessity and proportionality and provides a robust justification for the proposed designations.
	In summary, the proposed scheme fails to satisfy the statutory requirements of necessity and proportionality, is not supported by a robust evidence base demonstrating effectiveness, duplicates powers the Council already holds, and imposes unjustified costs on compliant landlords while risking adverse consequences for the wider housing market.		

Theme	Example comment	Comment source	Council response
Issues in council and housing association properties	*The biggest issues in Medway are derived from public social housing and not privately rented housing.* *The problem is the public sector social housing tenants set a very low standard of looking after properties and this affects the house prices and how much a private sector landlord can invest into their houses and the house price itself and maintenance.* *The issue of Medway becoming more 'run down' is to do with long term lack of investment in social housing, banks unable/unwilling to loan to potential buyers.*	Consultation survey comments	The licensing proposals are set in the context of the council's wider programmes to tackle housing need, increase sustainability, improve property standards and reduce ASB. Licensing is part of the council's wider strategy to improve the lives of residents in Medway. Like many areas, Medway is under increasing pressure to find suitable temporary accommodation for families. The *Medway Homelessness and Rough Sleeping Strategy to 2030* comprehensively sets out Medway's approach and highlights the council's commitments: • to understand the needs of Medway residents and seek to provide accommodation options that match these needs; • to maximise use of government funding to increase the quality and provision of supported housing to meet the needs of Medway residents; • to maximise use of government funding and the central budget to increase opportunities for people to stay in their current homes; • to explore use of Medway's existing stock, and other social housing stock, to see how a better level of suitable accommodation can be delivered; • to work with Medway landlords to improve standards where required and provide information to tenants to help them understand their responsibilities; • to explore and enhance move on options for those in temporary accommodation and supported accommodation;

Theme	Example comment	Comment source	Council response
			• to seek funding for a 24-hour staffed hostel provision, which can meet the needs of people with very complex and enduring issues and who are often excluded from other services. Whilst the council acknowledges that all property types may have issues with poor property conditions, licensing is a tool available for the council to use to address these issues solely in the PRS. **Properties let by a local authority or a registered provider (housing association) are exempt from licensing by law and thus any issues with these types of properties must be dealt with separately.**
Short-term lets	*Include Airbnb properties as landlords may try and get around licencing and legislation to maintain and manage their properties.*	Consultation survey comments	Properties let through Airbnb are short-term lets and do not legally fall within the scope of selective or additional licensing schemes, which apply to longer term rentals. These properties are subject to separate planning and regulatory frameworks. Airbnb properties may require planning permission for change of use if the property is rented out frequently. Generally, they require planning permission if let for over 90 nights per year Guidance on short term and holiday lets in London | London City Hall The council will continue to monitor short-term lets and respond to issues caused by Airbnbs, such as noise complaints using appropriate legislation.
	The situation is no different to inner London, renters especially short-term renters tend to have little regard to their environment and neighbors because they're not invested like home-owners and long-term renters.		

Theme	Example comment	Comment source	Council response
Council tax as an alternative to licensing	*Regardless of the property rented or not landlord/tenants pay council tax anyway. That is more than enough and already too much for any property.*	Consultation survey comments	The council has considered a range of alternatives to selective and additional HMO licensing, but do not believe they are as effective in dealing with poor housing conditions in Medway (Please see Section 14 of the Consultation Evidence Pack).
	You are now charging council tax as soon as the property becomes empty even though you acknowledge you want better homes for tenants , well it takes time to put new carpets , paint , new bathrooms / kitchens that on occasions have been treated appallingly by tenants and to make it nice for the new tenants but you have taken the three months grace on council tax away recently which is unjustified as nobody is in the properties using the services of the council . The government and councils wonder why rents are going up , it is simple , with the amount of legislation and bureaucracy involved and your bias towards tenants no wonder prices rise .		
Misconception that licensing will increase the number of HMOs and overall opposition to HMOs in Medway	*We already have far too many hmos in medway , alot have very dodgy housing conditions , land dont address issues, more worried about getting paid , you need to have a dirext point of contact and address reports seriously*	Consultation survey comments	HMO planning and HMO licensing are separate regimes, and their legislative requirements are quite different. Small HMOs (between 3 and 6 unrelated occupiers) have permitted development rights. The council has no legal grounds to take action or stop the development where change of use is 'permitted'. Property licensing schemes do not result in increased numbers of HMOs, but they do seek to improve the management and
	Stop letting so many pop up , actually inspect the hmos , have a point of contact that actually makes the tenants feel loke your listening abd want to help		

Theme	Example comment	Comment source	Council response
	I believe HMOs should be stopped, they are the route cause to many anti social issues and tend to be badly run / maintained, by landlords after making a quick profit rather than providing decent homes HMOs should be subject to very strict ruling, licencing and regular checks, also they should be limited to how many can be authorised in a certain region / Area		standards of the HMO properties already in existence. The council is confident/believes that an additional HMO licensing scheme would improve standards in areas with high numbers of HMOs. The licensing scheme will enable issues of overcrowding within HMOs to be addressed. There are specific licence conditions relating to the maximum occupancy of both the property and the rooms within it. Licence-holders are required to inspect their properties every three months. This must include evidence of checks that the HMO is being occupied by the level of occupancy specified in the licence.
	Do not give out HMO licenses to encourage overcrowding to start with.		
Support for landlords dealing with tenant-related issues	*Much could also be done in supporting landlords with dealing with anti-social tenants and issues arising from tenant mismanagement of property.*	Consultation survey comments, Propertymark letter	The council will work in partnership to support landlords in dealing with tenants causing overcrowding or persistent ASB. Licensing Officers will work closely with the Homelessness Prevention team to support landlords and tenants to sustain tenancies. However, where the sustainment of tenancies is not possible landlords are advised to seek legal advice before taking steps to seek possession of their property.
	What about tenants' duty to look after the property, ventilate adequately, dispose of waste properly, and report repairs before they escalate?		
	Landlords should not be solely held responsible for tenant behaviour, and the council could play a stronger role in discouraging anti-social activity through fines, monitoring, and community initiatives.		
	Propertymark advocates for a regulatory framework that focuses on educating and supporting landlords to improve their properties, rather than relying on punitive measures that are often difficult to enforce and risk penalising compliant landlords while allowing non-compliant ones to go undetected.		

Theme	Example comment	Comment source	Council response
Overall opposition to schemes	*These schemes are a blatant cash grab by local authorities, further penalising landlords with marginal returns and will further reduce the available housing stock and raising rents on what remains*	Consultation survey comments, NRLA letter	Whilst the council understands that some stakeholders may disagree with the proposal to introduce selective and additional HMO licensing, the council has provided evidence of the need for selective and additional HMO licensing to tackle persistent issues with poor housing conditions. The council can only introduce selective and/or additional licensing in areas where there is evidence that the areas meet the criteria as specified by the Housing Act 2004. The council carried out a detailed analysis of the evidence available and has been selective in proposing designations for areas that meet the criteria of poor housing conditions. Licensing forms part of a broader strategy to improve housing conditions, management standards and neighbourhood outcomes in the PRS. The council considers that a targeted and evidence-based approach is necessary to address the issues identified and to deliver improvements for tenants, responsible landlords and the wider community.
	So we have the renters rights act just introduced , an ombudsman just about go live , EPC legislation (which by the way we have complied with even though costly in Victorian houses) , a national register will go live soon as well and this licensing is just overboard and a way for you to make money .		
	Focus on HMOs and rogue landlords with multiple tenants. The average person renting their home out for income should not necessarily have to be monitored to the same extent or face as many barriers.		
	While the NRLA shares a common interest with Medway in ensuring a high-quality private rented sector, it strongly disagrees that additional and selective licensing is the most effective approach to achieve this goal in both the short and long term.		

Theme	Example comment	Comment source	Council response
Overall support for schemes	*Licensing schemes, if well implemented and properly enforced, have the potential to improve housing conditions for tenants, support responsible landlords and reduce the negative impact that poorly managed rented properties can have on neighbourhoods.*	Consultation survey comments	The council is confident that taking a proactive approach to addressing poor housing conditions through the introduction of selective and additional licensing schemes will benefit landlords, tenants and the wider community. The council acknowledges the support received from the MP for Gillingham and Rainham, the Arches Chatham Neighbourhood Forum, and Safeagent, regarding the proposed schemes. The council also welcomes the support expressed by respondents and notes that many considered the proposed schemes to be a positive step towards improving standards in the PRS. Respondents highlighted the potential for licensing to improve housing conditions, support responsible landlords, tackle poor management practices and reduce the impact of poorly managed properties on local communities. The council believes that the proposed selective and additional licensing schemes will provide an important framework for improving standards, encouraging compliance and supporting earlier intervention where problems arise. The schemes form part of a wider approach to improving housing quality and ensuring that all residents have access to safe and well-managed homes.
	I 100% fully support this scheme. I moved to Medway from London in 2021 and I am home owner. The situation is no different to inner London, renters especially short-term renters tend to have little regard to their environment and neighbors because they're not invested like home-owners and long-term renters. Landlord's generally aren't concerned as long they're receiving their rent/income/profit. Medway is beautifully located and has so much potential but there is a massive amount of behavioral change required and investment and I view this as a first good step on what will be a long journey.		
	I whole heartedly support the new proposals regarding the private rental sector and am sure it will help to make housing better for the most vulnerable.		