

## Appendix A

### Comments from Consultation Respondents

The key points raised in responses to the consultation were:

- A Fees and costs of running the scheme
- B Minor changes to the licence conditions
- C Fines to be used for non-compliance
- D Number and density of HMOs
- E Concerns over parking
- F Concerns about to-let signs
- G Number of HMOs emerging in St Thomas
- H Wider context of the Housing (Wales) Act 2014

Responses to the comments are detailed in section 5 of the report.

| Comments from Respondent   | Key points |
|--|------------|
| Fees are too high.   | A          |
| Documents are clear and useful and spell out constraints and requirements. Fee should be reduced for landlords applying to re-license where property still meets licensing requirements.   | A          |
| Licence fee should be increased. Attendance at a training course/professional development should be compulsory as part of the Fit and Proper person requirement. The Tenants' Charter should be reinstated in the Declaration of Understanding.  | A, B       |
| Opposed to re-designation of Additional licensing scheme. Costs are too high. There is overlap with proposals for registration and licensing under Housing (Wales) Act 2014. More Council resources should be put into voluntary collaborative working rather than licensing.  | A, H       |
| Policy is generally clear and covers most issues. Policy should include reference to other housing and planning requirements. Suggestions made about inspections under Part 1, Housing Act 2004 and role of Members in referrals. Fees should be higher. Suggestions made about operation of Temporary Exemption Orders. Information given to neighbours should also include contact details for Council. Some licence conditions should be more specific on types of issues or time periods. Relevant training attended by licence holder should be displayed in property. Notice to be displayed in window linked to public register and ICT systems. Consider reward system for positive tenant feedback. Query about Additional licensing being extended to St Thomas. | A, B, G, H |

|   |         |
|---|---------|
| Agree with principles and neighbours having emergency contact. Suggestion made for more control over external appearance of properties. Could policy address ongoing issue with occupiers ignoring refuse disposal arrangements.  | B       |
| Suggestion to make landlords and agents explicitly responsible for tenants' behaviour.  | B       |
| Broadly welcome proposals. Suggestion to extend licence requirement relating to electrical appliances.  | B       |
| A review every five years is too long. Landlords should have a responsibility to make sure tenants deal with rubbish.   | B       |
| Concerns over rubbish bags left outside properties when tenants leave.  | B       |
| Suggestion for greater control of letting agents. Level of enforcement should be increased. A system of fines should be introduced. Conditions should be extended to higher quality fire doors. Suggestion about widening scope of fit and proper person criteria. Suggestion that Welsh Government make changes with legislation to control density of HMOs and sound-proofing.  | B,C,D,H |
| Review broadly welcomed. A system of fines should be introduced. There should be greater enforcement. Licences should be displayed in property windows. Licence condition to be included about cleanliness of property internally. Requirement to be included about noise made by fire doors. Greater control over letting agents.  | B,C, H  |
| Welcome requirement for close neighbours to have contact details. Landlords should be legally responsible for tenants' refuse disposal.<br>Too many HMOs which devalue other property and destroy neighbourhood.  | B, D    |
| Licence conditions should be enforced. Council should report poorly maintained HMOs to HMRC. Greater control of letting signs. Council Tax should be reduced for families living in areas with over density of HMOs. Efforts should be made to encourage re-conversion of HMOs to family dwellings. Licensing of HMOs for first year students should be prohibited. Suggestion that more space should be available within property to reduce occupancy levels. HMOs should be sound-proofed. Licence conditions should relate to external appearance of property. | B, F    |

|  |             |
|--|-------------|
| <p>A limit should be introduced for the number of HMOs in an area. Fines should be imposed for landlords failing to comply with licence conditions. There should be a central register of landlords with contact details. A grant should be available for people to convert empty HMOs back to single occupancy.</p> | <p>C, D</p> |
| <p>Noise-reduction measures should be included. Parking space should be included as associated amenity. Requirement for immediate neighbours to have contact details is good idea. Notice should be displayed in window of licensed properties.</p>  | <p>C, E</p> |
| <p>Conditions should be monitored and enforced. Fines should be introduced for landlords. Greater control of letting signs suggested. Licensing periods should be one year not five.</p>   | <p>C, F</p> |
| <p>Introduce cap on number of HMOs in an area.</p>   | <p>D</p>    |
| <p>Consideration to be given to density of HMOs in relation to non-HMO housing.</p>  | <p>D</p>    |
| <p>Rubbish in Brynmill is a problem. Landlords' contact details should be made available. Council should prosecute landlords. A limit on the number of HMOs should be introduced.</p>  | <p>D</p>    |
| <p>Area is at saturation point with HMOs.</p>  | <p>D</p>    |
| <p>Welcome general aim of policy. Concerned about density of HMOs in certain areas.</p>  | <p>D</p>    |
| <p>Limit should be introduced about number of HMOs.</p>  | <p>D</p>    |
| <p>Policy should ensure balance between HMOs and other housing.</p>  | <p>D</p>    |
| <p>Parking requirements should be considered when issuing licence. Additional controls should be extended to other areas not just Castle and Uplands.</p>  | <p>D, E</p> |
| <p>Parking provision to be included when considering issuing a licence. Landlord to nominate one person to be responsible for refuse. Controls on number of HMOs in an area should be introduced.</p>  | <p>D, E</p> |
| <p>Agree with proposed regulation. Greater control of letting signs suggested. Landlords should have greater control over rubbish and recycling. Residents should be able to report problems quickly. Some streets have too many HMOs.</p>   | <p>D, F</p> |

|  |       |
|--|-------|
| Proposed policy is just a paper exercise. There should be more control over letting agents. Concern over amount of to-let signs. Concerns that landlords do not pay enough attention to condition of properties. | F, H  |
| Policy should include proposed review of situation in St Thomas and impact of new student developments.  | G     |
| Questions over how HMO licensing fits with new requirements under Housing (Wales) Act 2014.  | H     |
| Suggestion that sanctions for breach of licence conditions could be reinforced.  | Other |
| Very comprehensive policy.   | Other |
| No benefit in scheme and policy should be abolished.   | Other |
| Scheme is bogus and ignored by landlords, tenants and agents.  | Other |