

## Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area Schedule of Consultation Comments

### List of Consultees

#### Cardiff Council:

All Plasnewydd Ward Members:

Dan De'Ath  
Peter Wong  
Sue Lent  
Mary McGarry

All Cathays Ward Members:

Ali Ahmed  
Norma Mackie  
Sarah Merry  
Christopher Weaver

Planning  
Waste Management and Recycling  
Sustainability  
Regeneration  
Housing Options Service  
Anti-social Behaviour (Housing)  
Rent Smart Wales

#### Assembly Members / MPs:

Jenny Rathbone AM, Cardiff Central  
Jo Stevens MP, Cardiff Central

1425 Tenants and Residents in the Ward

#### External Partners:

##### Students

Cardiff Students Union  
Cardiff University  
Cardiff Metropolitan University  
University of South Wales

##### Landlords / Agents

1,062 individual Private Landlords  
And Letting Agents  
Cardiff Landlord Forum  
Residential Landlords Association  
National Landlords Association  
Residential Letting Agents Association  
Association of Letting and Management  
Agents

South Wales Police

South Wales Fire Service

Shelter Cymru

Tai Pawb

### Responses Received From:

Douglas Haig, Vice-Chair and Director for  
Wales, Residential Landlords Association  
Cymru

K McNeff – Letting Agent

L Cotton – Plasnewydd resident

Dan De'Ath, Councillor for Plasnewydd

Sarah Merry, Councillor for Cathays

Jennifer Sadler, Waste Management,  
Cardiff Council

Sarah Spencer, Accommodation Services  
Manager, Cardiff Metropolitan University

95 Online Survey Respondents

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
<b>Approach to consultation</b>			
Approach to consultation	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	<p>From the outset, there are problems with accessibility. With the business case for the re-declaration of the Scheme made in the cabinet meeting document, there should be a link available and easily visible for respondents to read. However, there is no such link on the live consultation page – <a href="https://www.cardiff.gov.uk/ENG/Your-Council/Have-your-say/Live-Consultations/Pages/default.aspx">https://www.cardiff.gov.uk/ENG/Your-Council/Have-your-say/Live-Consultations/Pages/default.aspx</a> - nor the consultation document itself – <a href="https://www.srs.wales/Documents/Public-Consultations/Public-Consultation-to-redeclare-Plasnewydd-English.pdf">https://www.srs.wales/Documents/Public-Consultations/Public-Consultation-to-redeclare-Plasnewydd-English.pdf</a>.</p> <p>Also, as the RLA highlighted in correspondence to the Cabinet Member for Housing, the time the consultation will have been open for is insufficient. Best practice guidelines from both the UK Government and the National Assembly for Wales recommends that for a consultation of this importance, a minimum period of twelve weeks would be required with additional time considered should the consultation period fall over public holidays. However, this was open for less than seven weeks, with the Christmas/New Year break in the middle. While respecting devolved matters to Wales, consultations in England must be a statutory ten weeks, and the RLA believes this would be a more appropriate timescale. As a result of these issues, the consultation period should be extended or re-opened and re-run altogether</p>	<p>There was no link to the Cabinet Report, and it would not be a problem to include such links in future consultations. The consultation document contained a lot of information for people to read, and it is a fine balance to ensure that people get the right information without overloading them or distracting them from the real issues. The inclusion of links to the Committee report approving the consultation may well have distracted respondents from the information provided on the re-declaration and the completion of the surveys.</p> <p>The Survey ran from Mon 16 December to 31 Jan initially (just under 7 weeks) but was extended for a further 2 weeks following representations from Cardiff Landlord Forum. The Shared Regulatory Service and Cardiff Council sent out tweets advising of the extension and a further reminder closer to the closing date.</p> <p>The consultation period for the Cathays re-declaration was for only 4 weeks which at the time was deemed to be in line with other formal Cardiff Council consultations. This consultation period was almost 7 weeks initially after taking into account the Christmas/New Year break but was extended for a further 2 weeks following representation. It is believed that this has been sufficient time to gather meaningful responses from 41 landlords/agents, 26 tenants and 27 other residents. The list of organisations making a formal written response is listed on the front page of this Schedule of consultation responses. The exercise has been comprehensive with 1062 letters being sent out to landlords and agents, and a further 754 emails sent to those landlords and agents inviting them to complete the survey. A further 1148 letters were sent to tenants and 277 emails to residents of Plasnewydd on the Cardiff Council Citizens Panel.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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			<p>The Plasnewydd additional licensing scheme has been in place for 5 years with 841 additional HMOs now licensed. It is felt therefore that landlords are now very familiar with the concept of Additional Licensing and will have formed views about how the scheme operates. Landlords are therefore better informed about the impact of the scheme and under those circumstances it is believed that the period of the consultation was adequate for a response, and indeed landlords have made comprehensive responses within that time frame.</p>
<b>Fees and Costs</b>			
Fees and costs	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	<p>The proposed fee of £475-550 per <i>property</i> is excessively high for a landlord to pay. The consultation document also does not state if the Council will allow landlords to pay the licence fee in instalments. Landlords will apply for licences and, likely, pass the cost on to tenants in the form of increased rents to cover the cost of applying for a licence, doing nothing to address affordability, while the worst landlords – the criminal operators – will simply ignore the Scheme, as they do many other regulations. The focus of staff becomes the processing and issue of licences, while prosecutions centre on whether a property is licensed or not, rather than improving management standards and property conditions. The current fee structure proposed reflects this argument, and the Council should consider amending the fee structure and reducing the proposed application fee overall. However, if Cardiff Council wanted to be more radical, it could do so by not charging landlords at all to apply for the additional licence. This could encourage more HMO landlords to apply. If Cardiff Council maintains the view that the Scheme drives up standards in the PRS, then they should explore this as a means of meeting their objectives. Additionally, if the Council believes that driving up standards in the PRS is a public good, then administration costs should be funded through council tax or the financial settlement given by the Welsh Government.</p> <p><b>Gaskin v Richmond 2018 &amp; Fees</b></p>	<p>Mandatory and Additional Licensing Fees have been calculated and will be reviewed using the Welsh Heads of Environmental Health Licensing Toolkit. Comparison with other Welsh Councils or similar English Authorities shows that Cardiff's fees are similar or in some instances significantly lower. It remains the case that a significant proportion of salary and administrative costs are met from base funding rather than fee income.</p> <p>This has been a conscious approach in order to satisfy the principles laid down in the Hemming v Westminster case, which restricted the ability of Councils to spend licence fee income on the enforcement of the scheme, now largely overturned. However, fees have also been kept comparatively low in recognition of the feedback received from landlords about the impact of high fees.</p> <p>The Council has made every effort to keep fees low and recognises the impact that high fees may have on landlords.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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		<p>In R(Gaskin) v LB Richmond Upon Thames (2018) EWHC 1996 (Admin) the High Court overturned a prosecution against Mr Gaskin and gave substantial guidance on fees and other points associated with HMO licensing and by implication selective licensing, schemes under the Housing Act 2004.</p> <p>The Gaskin case was focused on the fees charged for a licence. The outcome was that a fee should just be for the application and there should not be additional charges, such as late application fees, or a fee to transfer a licence. We hope that Cardiff Council takes into consideration the findings of this court case, and only asks for information set out in the relevant regulations, and nothing else. This includes taking the licence fee in 2 parts, one part on receiving the application, and the other part payable to the Council once the licence is granted. The Council, if it chooses to continue with additional licensing, should revise its fee structure to reflect the findings of Gaskin v Richmond.</p>	<p>Councils are under pressure to make significant budgetary savings and the Housing Enforcement Service is under similar resourcing pressures. The Council wishes to address issues relating to the impact of HMOs in Cathays and Plasnewydd, and it makes sense to secure an additional budgetary source to support this proactive area based work, but we need to be clear that this is not a money making exercise for the Council, which can derive no profit from this income stream and which only partially covers salary and administrative costs.</p> <p>Any review of HMO Licensing Fees and charging structure will be carried out and implemented in accordance with all legal requirements and best practice.</p> <p>The argument that good landlords are subsidising the bad or that criminal landlords are ignoring the scheme is largely specious. Compliance figures tend to show that this is a clichéd and inaccurate picture. With over 70% of houses non-compliant with standards on inspection, it is wrong to say that good landlords with high quality houses are the first to comply. The position is in fact less polarised than that with a small number of landlords avoiding responsibilities or presenting dangerous properties but with a great many landlords having potential to improve property standards, knowledge, and management competence.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
			<p>The standards laid down are not high or aspirational; these are basic matters relating to health and safety, fire safety, warmth, security and the provision of basic kitchen and bathroom facilities in proportion to the number of occupiers. It is a legitimate use of these area based powers to ensure consistent application of these standards.</p> <p>The Housing Enforcement service has legitimately used Council databases, such as Council Tax, along with door to door enquiries in order to identify and target unlicensed HMOs. An officer has been assigned full time to this work. The team has had contact with over 1,750 properties in order to seek the best possible coverage of the scheme.</p> <p>34 Prohibition Orders have been served on the worst properties presenting severe risks to health and safety. It is likely that most of these dangerous properties would not have been discovered without the additional focus of the scheme. There have been 8 prosecutions for failure to licence or breach of regulations. There has been significant work undertaken to successfully defend these standards at the Residential Property Tribunal where landlords would not readily comply.</p>
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents in relation to fees and costs</b>			
Fees and costs	Anonymised landlord/agent	It's a tax. I think the Welsh Government could operate a better scheme through its Rent Smart scheme. It should be done through education and best practice. They could identify the landlords and target them directly.	See above
Fees and costs	Anonymised landlord/agent	Fees are too high for landlords.	See above

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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Fees and costs	Anonymised landlord/agent	Too many requirements, cost implication.	See above
Fees and costs	Anonymised landlord/agent	Additional costs to Landlords, which will affect rent increases.	See above
Fees and costs	Anonymised landlord/agent	Too expensive.	See above
Fees and costs	Anonymised landlord/agent	It is not fair to keep extorting these huge sums of money out of landlords. Pretty soon, it will be the straw that broke the camel's back, landlords will withdraw from the market and the rental market will flounder.	See above
Fees and costs	Anonymised landlord/agent	I just see this as another way to make easy money from landlords.	See above
Fees and costs	Anonymised landlord/agent	Limited money need elsewhere	See above
Fees and costs	Anonymised landlord/agent	Too expensive	See above
Fees and costs	Anonymised landlord/agent	The reason is blatantly obvious. Any person coming into my rented out house can see at a glance that the Landlord looks after and cares for his tenants. Just 2 or 3 minutes is all it would take to acknowledge this. The same, but vice versa on entering a rogue landlord's house. I am having to pay the Council a lot of money and spend a lot of additional time for the Council to sort out the rogue landlords	See above
Fees and costs	Anonymised tenant	Too costly.	See above
<b>Reasons given by survey respondents supporting the re-declaration of the Scheme referencing fees and costs</b>			
Fees and costs	Anonymised landlord/agent	Obviously the Council would like to ensure that all new landlords are licensed - I'm happy to continue as an existing licensed landlord but £120 pa is a lot of money to lay out when you don't get any benefits from the Council for being licensed. I pay that for being a member of the NLA and get advice, updates, training - all sorts of benefits. You're really just using it as an additional tax on landlords. No carrot just the stick!	The Council is open to suggestions about any benefits it might give to licensed landlords, but at this stage the fee is an administrative one to partially fund the cost of the scheme.
Fees and costs	Anonymised landlord/agent	Subject to a review of the fee burden.	See above.

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
Fees and costs	Anonymised landlord/agent	But the licence needs to be cheaper and last longer.	See above. Unfortunately the law does not permit that a licence last longer than 5 years.
<b>Effectiveness of the Scheme</b>			
Effectiveness of Scheme	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	<p>The consultation document states:  <i>"Currently, 37% of the additional properties are confirmed as up to standard, including those that were compliant on the application and those as a result of the licensing process."</i>  <i>"Additional levels of security are required for properties licensed under the Scheme which has resulted in 521 notices being served in relation to security since the Scheme was implemented, 17% of which have been confirmed as complied".</i></p> <p>This raises questions over the claims that the Scheme has been successful. Although several properties have seen their standards being in line with what is required due to the licensing process, when it is only little over a third of the additional properties, this reads like more of a failing of the policy given that this 37% includes properties that were up to standard before the application stage and that well over half of the properties remain non-compliant. Additionally, less than a fifth of the notices served regarding security have confirmed to be complied with. The fact that over 500 notices have been served suggests there are issues to solve, but the lack of compliance demonstrates that the Scheme is the incorrect method to tackle them.</p> <p>It should be added that additional licensing schemes usually introduce new standards that were not a requirement prior to the existence of a scheme. Therefore, the statistics local authorities often use as a measure of success lack credibility as they suggest a great deal of non-compliance prior to the scheme existing, whereas the actual situation is the changing of standards and the compulsion to meet these new requirements. Therefore, we ask the Council that if this is the case in Cardiff, that it publishes compliance statistics having divided the requirements that existed prior and after the introduction of the Scheme. Through this, Cardiff residents can assess the success of the Scheme properly. Additional licensing schemes only end up affecting landlords that are willing to come forward and licence their property. Meanwhile, criminal landlords continue to operate under the radar, posing a</p>	<p>Completing the Additional Licensing project in 5 years and ensuring full compliance is a huge undertaking. Good progress has been made in identifying and licensing HMOs, with approximately 1,100 HMOs now inspected and licensed in the area under both mandatory and additional licensing provisions. 84% of properties identified under the additional licensing scheme require works to ensure compliance with standards. Whilst the responsibility to comply with those requirements lies with landlords themselves, it is reasonable to expect officers to return to carry out compliance audits and to take enforcement action where standards are not met.</p> <p>A further 5 year designation will enable the Council to build upon the solid base that has been established, to focus enforcement resources on landlords who fail to license and to seek 100% compliance with licensing standards. Given the scale of the task and the level of non-compliance, it is not unreasonable to seek a further 5 year designation to ensure full compliance.</p> <p>In the early stages of the scheme, it has been logical to focus resources on producing licences for those that have made applications and to shift that focus to enforcement as the scheme has progressed with 8 successful prosecutions undertaken and 34 Prohibition Orders made. The Council intends to continue with that ramping up</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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		<p>far greater danger to a harmonious PRS and tenant rights. If resources shifted from the Scheme to enforcing the law on criminal landlords, then inevitably that will lead to better results? This will be more in line with the Council's Corporate Plan 2019-2022 which states the Council will <i>"Drive up standards in the private rented housing sector by taking enforcement action against rogue agents and landlords letting and managing properties"</i>.<sup>1</sup></p> <p>Furthermore, the following comment, made in the consultation document suggesting the Scheme has led to a fall in burglaries in Plasnewydd is conjecture: <i>"Reported crime statistics for burglary in the area show some decline with figures of 148 in 2018 compared to 208 in 2013 and 264 in 2012."</i> This is a correlation, not causation. This modest fall coincides with a national, trending drop in crime during that period.</p>	<p>of enforcement during the term of a second designation.</p> <p>The standards laid down are not high or aspirational; these are basic matters relating to health and safety, fire safety, warmth, security and the provision of basic kitchen and bathroom facilities in proportion to the number of occupiers. It is a legitimate use of these area based powers to ensure consistent application of these standards.</p> <p>All health and safety "standards" have in effect been in operation since the introduction of the Housing Health and Safety Rating System in 2006. Fire Safety Standards are those contained within the LACORS Fire Safety Guidance which has formed the basis for standards enforced throughout Wales since 2008. The standards are not new and are generally the same as those that have been enforced by the Housing Enforcement Team across Cardiff for more than a decade.</p>
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents in relation to the scheme's effectiveness</b>			
Effectiveness of Scheme	Anonymised landlord/agent	There is no proof that the huge amounts of money we have had to pay are justifiable when the vast majority of houses are in excellent condition. There is no strong evidence base to suggest otherwise. The system is corrupt in my view as it is not objective.	See above
Effectiveness of Scheme	Anonymised landlord/agent	It has been tried already and the landlords that are going to comply with the rules have already done the specified work. As no more change of use is going to be allowed in most of the roads affected by the licensing all properties should now be compliant if the scheme has worked.	See above
Effectiveness of Scheme	Anonymised landlord/agent	I can only speak about my own experience where I had to fight hard to stop the council seriously down grading my tenants living conditions that I and they believed would have affected their	The Council's standards are those commonly applied for the protection of health and safety in houses. Where landlords wish to provide an equivalent but different solution, the Housing



**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
		quality of life. My tenants told me they would leave if the council's initial requests were to go ahead.	Enforcement Team is in a position to consider alternative proposals
Effectiveness of Scheme	Anonymised landlord/agent	In the case of the flat that I let to students I don't think the additional licensing scheme has made any difference as the flat was already in excellent condition and no additional action was required as a result of the inspections/licensing process. However, from what I understand, across the Plasnewydd area there have been numerous benefits to both landlords and tenants.	Noted
<b>Overlap with Landlord Registration/Licensing</b>			
Overlap with Landlord Registration/Licensing	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	Rent Smart Wales (RSW) was established to be the "single licensing authority" for Wales. With the introduction and renewals of additional licensing schemes, local authorities in Wales end up undermining that founding principle upon which Rent Smart Wales exists. Improvements to the management of HMOs have been included in the " <i>What the Scheme has achieved</i> " section. Understandably, something should fill this section when it has been included as one of the " <i>Benefits of Additional Licensing in the Plasnewydd Ward</i> " which would have been decided before RSW came to exist, as the previous Scheme was declared in 2014. However, whether management of HMOs have improved or not, this cannot be claimed to be a victory for the Scheme. It is then more mysterious to read the summary that states re-declaring the Scheme will " <i>continue to ensure that effective management arrangements are in place</i> " when the consultation document does not prove that it has done so in the first place.	Rentsmart Wales was established as an all Wales registration and licensing authority for landlords and agents having responsibilities under the Housing (Wales) Act 2014, which is very distinct from those HMO licensing responsibilities under the Housing Act 2004, which remains on the statute books.  The focus of the two schemes is distinct and indeed complimentary with Rent Smart focusing on fitness and training/competence with HMO licensing having a greater influence on property conditions and management standards.
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents in relation to overlaps with Landlord Registration</b>			
Overlap with Landlord Registration/Licensing	Anonymised landlord/agent	Rent Smart Wales requires registration and licensing of landlords and Agents. The additional licence is therefore not required. It seems to just be another way for the council to generate revenue. The legislation is outdated and no longer necessary or fit for purpose.	There is of course an element of duplication because both schemes require a fit and proper person test. However, the focus of the two schemes is distinct and indeed complimentary with Rent Smart focusing on fitness and training/competence with HMO licensing having a greater influence on property conditions and management standards.

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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			<p>Rent Smart Wales does not have any focus on property standards and given the comprehensive All Wales coverage of the scheme it is not suited as a tool to bringing about a concerted area based improvement to a district containing a high density of HMOs. Indeed Rentsmart Wales does not have any powers of inspection and relies upon the evidence of the Housing Enforcement service with respect to property conditions where fitness and propriety is in doubt.</p> <p>During the course of the Plasnewydd Additional Licensing Scheme, 841 additional properties were inspected. 84% were not up to standard and required works. 1,458 notices were served. 34 properties have been subject to Prohibition Orders. It is clear that these matters would not have been addressed without the intensive area based focus of the scheme.</p> <p>However, while the scheme has progressed, the level of non-compliance has fallen i.e. the number of properties found upon first inspection to be below standard has fallen each year. It is hard to evidence exactly why this is happening. It is possible that the additional learning brought about by Rentsmart Wales is a factor but more significantly it is probably due to landlords and agents learning what standards are required and preparing properties in time for inspection.</p> <p>The additional cost implications should not be excessive for landlords as the requirement to</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

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			register and obtain a licence under Rent Smart Wales is a straight forward administrative process which is reflected in the level of the fee.
<b>Scope of the Scheme</b>			
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents in relation to the scope of the scheme</b>			
Scope of the scheme	Anonymised landlord/agent	If it has upgraded this area, then it is time to move onto another area of Cardiff so they can be at the same standard as Cathays and Plasnewydd! At the present time you are discriminating landlords in only 2 areas of Cardiff. Canton, Grangetown could be helped by introducing this scheme!	There are currently no developed plans to extend additional licensing to other areas, although this is a matter that will remain under review. While a valid case may emerge in future for such an extension, the current focus is on Cathays and Plasnewydd because they are the two wards in Cardiff having by far the highest concentration of HMOs.
<b>Reasons given by survey respondents supporting the re-declaration of the Scheme referencing the scope of the scheme</b>			
Scope of the scheme	Anonymised landlord/agent	For better standard, I think this should also include flats and houses with multiple flats	Flats in multiple occupation and houses subdivided into multiple flats are included where the standard of conversion does not meet building regulations. This is the legal position. Flat conversions which comply with the Building Regulations cannot be classed as HMOs and therefore cannot be included within the scope of the scheme.
Scope of the scheme	Anonymised landlord/agent	Only if all HMO properties are included.	All HMOs are indeed included.
Scope of the scheme	Anonymised landlord/agent	All landlords should have to comply to these safety standards	The scheme does indeed ensure that landlords comply with a common set of standards.
<b>Addressing non-compliant landlords</b>			
Addressing non-compliant landlords	Douglas Haig, Vice-Chair and Director for Wales,	There are over 140 Acts of Parliament that affect the PRS in Wales and three significant pieces of housing legislation have passed through the Assembly since 2014. Councils should fully use the enforcement powers already granted to them to root out rogue landlords and agents. When combined with RSW, then there is	There is a very high concentration of HMOs in Cathays and Plasnewydd, and it makes sense to use a tool, additional licensing of HMOs, which is specifically designed to deal with areas having

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
	Residential Landlords Association	undoubtedly plenty of information available to properly enforce. If time, energy, and resources were put into this to do things such as create a database for rogue landlords and letting agents, rather than licensing schemes which make life hard for good landlords, then maybe government enforcement would yield better results. The Council has also not taken into consideration the amount of informal enforcement activity undertaken between local authorities and private landlords. We must also highlight that the summary at the end of the consultation document interestingly does not note that the additional licensing scheme's renewal in Plasnewydd will build-up joint working relationships with landlords and landlord representatives. Does the Council not believe the Scheme will assist in these relationships?	<p>concentrations of HMOs. The key elements are that it places an onus on the landlord to comply, which triggers an inspection and comparison against agreed standards. Importantly, the ability to charge a fee helps to support this proactive work.</p> <p>It would not make sense for the Council to attempt to carry our proactive work to improve standards in HMOs and to ignore the very tool which is best suited to this.</p> <p>It is often difficult for tenants fearing retaliatory eviction to report poor properties, and it would be an extremely difficult process to try to identify poor properties and rogue landlords without the additional licensing tools. Data sharing can be difficult and constrained by Data Protection Regulations, and there is no statutory provision, as there is in England, for a database of rogue landlords.</p> <p>It is a valid point that additional licensing does indeed build up joint working relationships with landlords and agents, with officers now having good contacts and relationships with many key landlords and agents and often able to get matters resolved without recourse to formal action.</p>
<b>Reasons given by survey respondents supporting the re-declaration of the Scheme referencing non-compliant landlords</b>			
Addressing non-compliant landlords	Anonymised landlord/agent	Maintains standards. Provided enforcement action against unlicensed properties is ramped up, and action taken against landlords whose tenants are not treating the area with respect.	It would indeed be a key reason to re-declare so that the Council can turn its attention to greater auditing and enforcement where properties have been found not to meet standards and cannot yet be confirmed as compliant.
<b>Impact on business and rental markets</b>			

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

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Impact on business / rental market	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	<p><b>Welfare Reform</b></p> <p>The significant increase in rent arrears for both 'UC' tenants and 'legacy' Housing Benefit tenants also points to much broader issues than just the implementation of Universal Credit. The findings suggest that the freeze to LHA rates since 2016 and that LHA rates had not increased with market rents between 2010 and 20216 is likely to be driving the increase in rent arrears for tenants that claim benefits. More and more landlords are planning to sell properties in the next 12 months. This now stands at 22% and is up to three percentage points since 2016. While the proportion of landlords looking to buy properties has continued to decline, and more landlords are planning to sell than buy. This indicates a chronic undersupply of privately rented homes in the future. Many landlords may be in a situation where they are not able to pay a local authority additional licence fees, Rent Smart Wales registration and licensing fees, the likely increase fees as a result of the Renting Homes (Fees, etc.) (Wales) Act, reduction in mortgage relief tax, and deal with rent arrears on their properties. This will result in financial difficulties for landlords and may lead to an increase in demand for council services as they consider leaving the PRS.</p> <p><b>Pressure on non-licensed areas</b></p> <p>Landlords, especially those with properties outside the licence area will become risk-averse in terms of the tenants they let to. Tenant problems such as anti-social behaviour are impossible for the landlord to address alone and landlords will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere. Some may seek to evict already challenging tenants, resulting in additional costs to other local authority services, as they pick up the pieces created by the disruption to the lives of already vulnerable tenants.</p>	<p>The RLA raises some valid points. Local Housing Allowance (LHA) rates increased on 1 April 2020 after a 5 year freeze, however it is accepted that the LHA does not always cover the full amount of rent for some tenants.</p> <p>Cardiff Council uses various measures to prevent these tenants from experiencing rent arrears. If tenants are unable to afford the shortfall in their rent they can apply for a Discretionary Housing Payment via the Council's Benefit Service. In some cases a Rent Rescue can be paid to tenants that have accrued rent arrears which threatens their tenancy.</p> <p>Work undertaken as part of Cardiff's Homelessness Strategy 2018 – 2022, identified that the loss of rented accommodation, particularly for those in the private rented sector was one of the main causes of homelessness in Cardiff. To address the issue, staff within the Prevention team in the Housing Options Service routinely work with private landlords to help clients remain in their homes, or to assist clients to source alternative accommodation in the private rented sector. The Council also funds a number of schemes that provide financial assistance to enable access to the private rented sector.</p> <p>We do agree with the comments that landlords are leaving the private rented market in Cardiff. An investigation undertaken as part of the Strategy, into why so many clients were losing their rented accommodation revealed that one of the key factors was landlords withdrawing their properties from the rental market in Cardiff and putting them up for sale.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
			<p>Landlords told us that this, in part, was due to wider legislative and tax relief changes. One of the key aims of our Strategy is to improve the support available to private landlords to ensure homeless families have access to good quality, private sector accommodation.</p> <p>Although it is accepted that additional licencing is another financial commitment for landlords that may already be facing financial difficulties, it ensures that landlords are fit and proper persons, that properties are well-managed and hazards are addressed.</p> <p><b>Pressure on non-licensed areas</b>            Additional Licensing places a duty upon landlords to take reasonable steps to control anti-social behaviour, but those are only steps that any competent property manager might reasonably be expected to take in the proper conduct of their business. There is no expectation that landlords assume the role of proper enforcement authorities where the matter lies beyond their control. Landlords can legitimately provide verbal and written advice to tenants, often using website or written materials provided by the Council and other agencies.</p> <p>Similarly, it is a reasonable expectation that landlords discuss the implications of continued anti-social behaviour with tenants, and to put those matters in writing where appropriate. In extreme circumstances landlords may need to</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
			<p>seek possession in order to deal with problematic or persistent anti-social behaviour.</p> <p>In circumstances where landlords have chosen to let houses in multiple occupation it is reasonable to expect that they are able to deliver a service which addresses the more challenging managerial demands which will arise.</p> <p>The Council would not be in a position to take enforcement action for a breach of licence conditions where a landlord can demonstrate that they have taken all reasonable steps to control that behaviour.</p>
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents due to the impact on business/rental markets</b>			
Impact on business / rental market	Anonymised landlord/agent	Increases costs of landlords which then leads to increased rents and discourages landlords from providing rental properties in this area of Cardiff	<p>It is reasonable to expect all landlords to meet minimum health and safety, fire safety and amenity/space standards and the cost of meeting those standards should form part of the business case for purchasing and renting that property.</p> <p>The enforcement of minimum standards creates a level playing field where good landlords are not disadvantaged in comparison to those landlords who are not investing sufficiently and are providing unsafe accommodation.</p> <p>The cost of the licence across the 2014-2019 Plasnewydd Scheme was less than £10 per month which is insignificant in comparison to the larger rental income achievable in the HMO and student markets.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
Impact on business/ rental market	Anonymised landlord/agent	No doubt if the scheme is refreshed it will come with new requirements at the whim of inspectors. How the council can justify the allowance of a ridiculous number of multi-story student accommodation while simultaneously putting small time landlords out of business baffles me.	Requirements are not imposed at the whim of inspectors. Standards are agreed and adopted by Cabinet at the time the scheme is declared. The Housing Health and Safety Rating System (HHSRS) is a risk assessment tool allowing some flexibility for inspectors to deal with the many different risks and scenarios that present. All licence holders receive a draft of the licence and an opportunity to make representations. Many hazards are dealt with informally by inspectors. Where licences are awarded or Notices served, there is a right of appeal to the Residential Property Tribunal where landlords disagree with those requirements. Officers are aware that there may be alternative methods of seeking compliance with standards and are open to those suggestions where they achieve the desired result.
<b>Alternative mechanisms for raising standards</b>			
Alternative mechanisms for raising standards	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	There is little evidence that licensing schemes improve housing standards. As already mentioned, the focus of staff becomes the processing and issue of licences, while prosecutions centre on whether a property is licensed or not, rather than improving management standards and property conditions. Furthermore, the Renting Homes (Wales) Act 2016, will seek to introduce a new universal standard for renting in Wales. The legislation will seek to grant one, simple to use piece of legislation for reference on what will be required of private sector landlords. The use of further continuing licensing schemes would be seen to undermine the Welsh Government's work as well reducing the overall effectiveness of the provisions relating to Fitness for human habitation (FFHH) which will replace HHSRS.	The Cathays and Plasnewydd Wards contain the greatest concentration of the City's HMOs. In the first 5 years of the scheme the Housing Enforcement Team has secured the licensing of 1,100 HMOs, all of which have been inspected along with fit and proper person checks. Gas and electrical safety certificates have been obtained on all of these licensed HMOs demonstrating that they are safe and in many cases landlords will have carried out works in order to provide an up to date certificate free of defects.  In addition the Housing Enforcement Team has assessed an additional 430 properties in order to



**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
		<p>The matters considered are those similar to HHSRS with prescribed and considered matters. There will be two types of matters to consider as to whether a property is suitably fit.</p> <p><i>Prescribed Matters</i>            Prescribed Matters relate to electrical safety, smoke alarms, and CO2 alarms.</p> <ul style="list-style-type: none"> <li>• Electrical safety will generally cover the inspection of all electrical outlets and ensure that they are set to a British Standard (BS7671).</li> <li>• Smoke alarms, the consultation sought to seek clarification of the position on whether the smoke alarms should be hardwired or interlinked</li> <li>• Carbon Monoxide alarms are to be provided when gas burning applications are being used.</li> </ul> <p><i>Considered Matters</i>            The considered matters to which will determine that the dwelling is fit for human habitation are based on the 29 hazards and circumstances from the House Health and Safety Rating System (HHSRS). Examples are as follows:</p> <ul style="list-style-type: none"> <li>• Damp and mould growth</li> <li>• Asbestos and manufactured mineral fibres</li> <li>• Biocides</li> <li>• Carbon monoxide and fuel combustion products</li> <li>• Lead</li> <li>• Domestic hygiene, pests and refuse</li> <li>• Un-combusted fuel gas</li> </ul> <p>When considering Prescribed Matters, if it is found that any of these matters aren't met, then no matter how many of the considered matters have been met, the home will not be regarded as fit for human habitation. A landlord who rents a dwelling which is not FFHH, or who fails to rectify an issue causing the house to be unfit, may risk having their landlord licence revoked under Rent Smart Wales and possible breach of contract in the courts. We believe that the measures contained in the Renting Homes (Wales) Act 2016 will be sufficient to improve housing standards.</p>	<p>determine whether they require licensing. This has often been a time consuming process where properties have been converted into flats and it has been necessary to determine whether the premises meets building regulation standards, which would render those properties non-licensable.</p> <p>The Council is aware that compliance rates are currently low, although as the Cabinet report demonstrates, some progress has been made. The scale of the project is huge with 63% of properties failing to meet standards and a total of 1,458 statutory notices served.</p> <p>The fact that there are still such rates of non-compliance suggests that a second 5 year term is needed in order to secure those improvements.</p> <p>It is not true to say that the HHSRS is being replaced by a fitness standard for human habitation. HHSRS will remain the tool used by Housing Enforcement officers to assess housing and provide a basis for decisions and subsequent enforcement action.</p> <p>The new fitness standard will not be enforced by local authorities; it will be a standard based upon the 29 hazards contained within HHSRS which tenants may use in civil proceedings against their landlord where it is felt that the property is not fit for human habitation. There will be no enforcement role for Councils. HHSRS remains on the statute books and there will be an expectation that Councils continue to use it, as in England</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
		<p>Rent Smart Wales also requires landlords to complete training and registration, which aims to increase the standards of knowledge that landlords have to professionalise the sector.</p> <p>Overall there are several mechanisms already in place to improve standards. The RLA would recommend enforcing these laws instead of further licensing, especially considering our recent research conducted by our research arm PEARL into enforcement by local authorities. Our research has found that in 2012/13-2017/18, the number of HHSRS inspections fell by 22% in Wales and that in 2017/18 76% of Welsh local authorities had not commenced prosecutions against private landlords that year, higher than any region of England.<sup>3</sup> We would rather see investment in enforcement rather than further licencing schemes that do nothing more than prosecute those for not being licensed rather than for failing to adhere to standards.</p>	<p>where HHSRS and the new fitness standard operate alongside each other. It is fanciful to believe that the new fitness standard itself will replace the need for enforcement action by Local Authorities, either by voluntary compliance by landlords or through civil action by tenants.</p>
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents referencing alternative mechanisms for raising standards</b>			
Alternative mechanisms for raising standards	Anonymised Landlord/Agent	The Council should find a better way to manage the houses.	Noted
Alternative mechanisms for raising standards	Anonymised Landlord/Agent	The council should set up a scheme for reacting to reports of substandard housing and charging fees for intervention instead (HSE type approach). That way only the bad landlords pay.	Responding to complaints is the cornerstone of housing enforcement work. However, if the Council relies only upon reactive work of this nature rather than proactive work such as additional licensing it tends not to achieve sufficient comprehensive coverage of rented properties and does not find many of the sub-standard houses occupied by vulnerable tenants who would be unwilling or disinclined to make a complaint to the Council.
<b>Other Council Initiatives/Partnerships</b>			
Council initiatives/partnerships	Douglas Haig, Vice-Chair and Director for Wales,	<p><b>What the Council is getting right</b></p> <p>The “<i>Love When You Leave</i>” initiative shows positive engagement with an active community that is housed in HMOs and, crucially, recognises that tenants are the ones that must be responsible for</p>	The Council strongly disagrees that waste management is solely the responsibility of tenants and the Council; landlords have an important role to play. Where landlords have chosen to let

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
	Residential Landlords Association	<p>ensuring waste is properly disposed of in HMOs. This is especially important given that waste and the exterior condition of the property is seldom not cited as a chief reason why HMOs need to have an added degree of licensing. This is what the Council should be doing, working with tenants to keep the area and property tidy, rather than impose a burdensome licensing requirement on the landlord. Consequently, the existence of this programme shows that Cardiff Council recognises the responsibility of disposing of waste is the responsibility of the tenants rather than the landlord. Therefore, why are landlords required to fulfil additional licensing requirements when the problem is recognised to be chiefly caused by tenants?</p> <p>The Council's Waste Management Team constant presence in the Plasnewydd area and participation in student campaigns and events to promote the responsible presentation of waste must be noted to be a positive and proactive way to keep HMO areas clean and tidy. The same goes for the enforcement activities it undertakes to tackle those that don't comply with waste management requirements. Again, this does not need to be part of an additional licensing scheme, and the RLA would argue that it would be more effective in achieving its objectives.</p> <p>Also, the RLA would always welcome opportunities for landlords to train to become even more compliant, conscientious, and responsible, and so we would like to praise the recognition that educating landlords is the best way to eradicate bad landlords and drive up standards. However, there is a difference between educating and lecturing landlords. These people want to ensure their investment and their business can be the best it can be, but as the Council recognises in the consultation document, there are "accidental" landlords and those who need help. And that is what the Council should provide rather than a further burden. We would welcome any engagement from the Council on alternative ways to help landlords achieve the Council's aspirations without penalising a group of people that are already subject to a great deal of legislation and regulation.</p> <p>We would also like to note the merits of partnering with South Wales Police to drive down burglary rates in Plasnewydd.</p>	<p>properties in multiple occupation, realising far higher rents than could be achieved if those properties were family lets, then landlords must accept the additional management responsibility that comes with this kind of letting. It is entirely reasonable to expect landlords to manage their properties where their tenants do not comply with the arrangements for waste storage and collection, and to take an overriding responsibility for the cleanliness of yards, gardens and the exterior appearance of the house. The Management of Houses in Multiple Occupation (Wales) Regulations 2006 requires that the manager keep yards and forecourts safe, clean and in good order. Also, that gardens are to be kept in a safe and tidy condition. The principle that landlords remain responsible for the management of these issues is recognised in law. It is also reasonable to expect landlords to take steps to control anti-social behaviour. The Housing Act 2004 allows Councils specifically to apply licence conditions requiring the licence holder to take reasonable and practicable steps to prevent or reduce anti-social behaviour by persons occupying or visiting the house. A failure on the part of tenants to manage refuse and to allow unsightly accumulations of refuse in yards would without question be an example of anti-social behaviour. The existence of the "Love When You Leave" campaign is not in any way a recognition of the fact that the responsibility for waste disposal is a tenant responsibility and not one for the landlord. Tenants do of course have the primary responsibility but landlords maintain a well-recognised management role which the</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

Topic	Consultee	Comments	Response
			<p>permanent residents of Plasnewydd would expect them to fulfil.</p> <p>Educating landlords is undoubtedly a key measure for raising management standards but it is unrealistic to think that this would be an effective way of eradicating bad or rogue landlords where the correct approach is the careful and diligent application of the full range of enforcement powers. Some of this work is extremely intensive and time consuming, sometimes involving lengthy project work, joint working with Rentsmart Wales on fitness and propriety and drafting and presenting evidence and reports at the Residential Property Tribunal and the Courts.</p>
<b>General comments regarding the re-declaration</b>			
No support for the Scheme	Douglas Haig, Vice-Chair and Director for Wales, Residential Landlords Association	<p>In conclusion, rather than expanding an ineffective licensing scheme, Cardiff Council should use cross-departmental and multi-agency working and effective use of existing housing legislation to support tenants and landlords in maintaining tenancies, housing condition and management standards. The Council is already doing this in regards to the “Love When You Leave” initiative and its work with South Wales Police. The RLA advocates using council tax records to identify private rented properties and landlords. Unlike licensing, this does not require self-identification by landlords, making it harder for the small minority of criminals to operate under the radar. It would be a more effective method of targeting these criminals and rooting them out of the sector than another, unnecessary licensing Scheme.</p> <p>The RLA understands that this means giving up on a licensing scheme the Council has worked on. However, using the council tax records to identify criminals would allow the Local Authority to proactively tackle criminals quickly, instead of adding an additional layer of bureaucracy to good landlords. Thank you for giving these views your attention, and please get in contact for further details of our response if desired. I would only like to add that the RLA’s</p>	<p>The Council Tax database does not mark out a landlord as being criminal or non-compliant and would serve little purpose without an obligation to obtain a licence. These databases become meaningful when you can identify landlords who have failed to obtain a licence and are therefore non-compliant.</p>

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
		goal is to make renting better for everybody, creating a more harmonious PRS in the process.	
<b>Reasons for NOT supporting the re-declaration of the Scheme from survey respondents</b>			
No support for Scheme	Anonymised landlord/agent	Because the tenants are clever enough to pick a good quality property at an acceptable price and the landlords are required to meet all regulations. After that any additional requirements are costs which will eventually be passed onto the tenants.	Unfortunately it does not seem to be the case that landlords voluntarily meet all basic standards for fire safety and health and safety, as rates of non-compliance with the scheme show. Some tenants who are vulnerable or who do not have a good understanding of housing standards are unable to make a good choice and regrettably poor properties are still rented.
No support for Scheme	Anonymised landlord/agent	The scheme imposes a lot of requirements that are not easy to meet and the officers do not help or support the landlords.	During 2014 - 2018, 86% of respondents to customer surveys agreed that licensing improves standards across the City. In 2019, 100% of respondents agreed that licensing inspections had helped them improve standards of compliance.
No support for Scheme	Anonymised resident	There are many students' flats being built with not enough students moving in to them.	Noted – anecdotally that does seem to be correct. There will remain a strong desire for students to live communally in the private rented sector as part of the student experience and it is important that traditional private rented housing in Cardiff is of the standard that students and parents would expect.
No support for Scheme	Anonymised resident	Because, regardless of what the council may intend, standards of properties as least externally, is rarely maintained and lowers the standard of the properties surrounding	Noted
No support for Scheme	Anonymised resident	Share housing is a vital requirement with it being so difficult for first time buys to get onto the housing ladder. By restricting the number of HMO's in the area you reduce the number of rooms available to people trying to save for a mortgage	The additional licensing scheme does not place a restriction on the number of licences issued.
No support for Scheme	Anonymised resident	It leads to the concentration of even more HMOs in Plasnewydd, which in turn bring itinerants not committed to cohesive living. There are already too many HMOs in Plasnewydd. We need three bedroom and four bedroom properties for families to live in. Planning permission should focus on this type of development when Lan such as that occupied by the Blue Dragon becomes	It is unclear how the licensing scheme would actually increase the number of new HMOs in the area. Planning Permission is now required for all new HMOs in the City and the high concentration of HMOs in Cathays and Plasnewydd is taken into

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
		available. 5 or 6 mews houses there would improve the neighbourhood not drag it down market	account in all decisions about whether to approve or refuse permission.
No support for Scheme	Anonymised resident	It reduces housing stock and doesn't make a significant difference.	Noted.
No support for Scheme	Anonymised resident	Most of the original problems haven't been addressed properly. And the tenants in the area have seen their rents going up due to the scheme which only benefited the landlords who didn't invest enough but are getting much higher rents.	Noted. It would be the intention of a second designation to dedicate further time and resources to compliance now that the majority of properties have been licensed or assessed as non-licensable.
No support for Scheme	Anonymised tenant	Increase further rents.	Noted.
No support for Scheme	Anonymised tenant	Not good value for money. Little practical benefit.	Noted
No support for Scheme	Anonymised tenant	Better to spend money on hospitals.	The purpose of the Housing Health and Safety Rating System and HMO licensing are to eradicate hazards and risks to health and to help take the strain of the NHS.
No support for Scheme	Anonymised tenant	Nothing done to car parking last time. Waste of valuable resources that could be spent on building new schools	HMO licensing is unable to deal with parking provision.
No support for Scheme	Anonymised tenant	If you have just completed the scheme over last 5 years with no noticeable improvement to my eyes; surely it would be better to spend time and resources elsewhere. Also if you have caught criminal landlords over the last 5 years, how many more are there to catch in this area.	Noted. It would be the intention of a second designation to dedicate further time and resources to compliance now that the majority of properties have been licensed or assessed as non-licensable.
No support for Scheme	Anonymised tenant	We haven't had an inspection in 5 years that I know of, so what is the landlord (and hence tenants) paying for?	Noted. The scheme has covered approximately 1,750 properties so far with some applications pending assessment if and when the scheme is re-declared and another 129 cases subject to further investigation/evidence gathering. It is accepted that there will be properties that haven't yet been seen but every effort is being made to work towards 100% coverage.
<b>Reasons given by survey respondents supporting the re-declaration of the Scheme</b>			
Support for scheme	Anonymised landlord/agent	The standards of properties being offered for rental needs to be maintained.	Noted.

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
Support for scheme	Anonymised landlord/agent	Improves the standard and safety in the PRS.	Noted.
Support for scheme	Anonymised landlord/agent	To maintain good service and standard of the properties and supervision by the council	Noted.
Support for scheme	Anonymised landlord/agent	I have already invested substantially in this and if no longer required my investment will be unnecessary	It is true that re-designation will help to improve and maintain standards, and it would be a shame if failure to re-designate meant that properties already improved subsequently declined. However, any money spent on bringing properties up to minimum standards is not money wasted irrespective of whether the scheme is re-declared or not.
Support for Scheme	Anonymised resident	Landlords should be regulated to ensure they offer suitable, safe and affordable accommodation. In particular, the road which I live on (Keppoch Street) has some poorly maintained HMOs, they have poor exteriors and rubbish bags outside which creates an eyesore on an otherwise pleasant road. Landlords should be fined if they do not keep their property in good repair/ ensure tenants dispose of rubbish	Noted
Support for scheme	Anonymised resident	There has to be a safeguard for tenants and local home owners.	Noted
Support for scheme	Anonymised resident	Maintain a minimum standard.	Noted
Support for Scheme	Anonymised resident	To make nuisance landlords accountable.	Noted
Support for scheme	Anonymised resident	Anything that improves standards of living for those in rented accommodation is good and if this can help fund/drive waste management education and promote a 'consider your neighbours' type of attitude then even better.	Noted. The Council has recently recruited to the Student Liaison Officer position to work on some of these education and neighbourliness issues.
Support for scheme	Anonymised resident	It protects tenants and ensures they are living in conditions that must be met by the landlord.	Noted
Support for scheme	Anonymised resident	To continue to protect tenants, support on-going responsibilities of landlords and identify irresponsible landlords.	Noted
Support for scheme	Anonymised resident	To try and enhance the area, make it a pleasant place to walk about in, maintain and improve standards - both inside homes and outside homes and businesses.	Noted

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
Support for scheme	Anonymised resident	It is good to manage housing properly where there is a risk of unscrupulous landlords not behaving properly.	Noted
Support for Scheme	Anonymised resident	If the money generated from this is put to good use for the standards of the area, then I'm all for charging landlords more money for a HMO licence. But as I have stated previously, the benefits must be apparent to us. Plasnewydd has a drug and prostitution problem that isn't being eradicated. Are any of the HMOs involved shutdown or investigated? No.	Noted
Support for scheme	Anonymised resident	Because it will continue to improve standards of accommodation for tenants in the area.	Noted
Support for scheme	Anonymised resident	Tenants deserve to be living in decent, well managed accommodation. I think the need to be a 'fit and proper' person also helps ensure that property is managed properly in terms of end-of term waste disposal etc.	Noted
Support for scheme	Anonymised resident	Without it standards would not be maintained which is bad for tenants and residents.	Noted
Support for scheme	Anonymised resident	All the benefits listed in the document - more ownership on landlords to manage houses responsibly and manage tenants.	Noted
Support for scheme	Anonymised resident	Higher standards for tenants in the area. Houses maintained to adequate standard, improving general area.	Noted
Support for scheme	Anonymised resident	To regulate occupancy management and endorse standards.	Noted
Support for scheme	Anonymised resident	I'd welcome anything to help control HMOs in Plasnewydd. Attaching a quota of new licences in line with population density would be even better.	The additional licensing scheme cannot place a restriction on the number of licences issued. Planning Permission is now required for all new HMOs in the City and the high concentration of HMOs in Cathays and Plasnewydd is taken into account in all decisions about whether to approve or refuse permission.
Support for scheme	Anonymised resident	Over population of the area already and this will control slightly by maintain the standards	Noted
Support for scheme	Anonymised resident	Keep the pressure on landlords to provide decent homes.	Noted
Support for the Scheme	Anonymised tenant	There should be more protection for tenants in this area, because many are living in dangerous conditions.	Noted



**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
Support for the Scheme	Anonymised tenant	To try to make private landlords accountable for the inflated prices they charge so hopefully changes will be made for the better.	Noted
Support for the Scheme	Anonymised tenant	More regulation is needed in this area as landlords do not feel obliged to keep properties to a standard. Claims often get ignored or when raised more consistently, due to the power imbalance of owning the property landlords claim they feel antagonized by tenants for raising these issues, therefore tenants fall under the risk and insecurity of getting evicted anytime.	Noted
Support for the Scheme	Anonymised tenant	I think there are minimum standards that accommodation should meet and anything that helps these standards to be achieved is a good thing.	Noted
Support for the Scheme	Anonymised tenant	Helps maintain and improve property standards especially for students.	Noted
Support for the Scheme	Anonymised tenant	I think the council should be more proactive in finding tenants who maybe be a bit too scared to make first move .... look at the front court yards is a good guide on the up keep of properties.	Noted. The scheme has covered approximately 1,750 properties so far with some applications pending assessment if and when the scheme is re-declared and another 129 cases subject to further investigation/evidence gathering. It is accepted that there will be properties that haven't yet been seen but every effort is being made to work towards 100% coverage.
Support for the Scheme	Anonymised tenant	Ensures quality and certainty for tenants, and guides landlords on expected standards	Noted
Support for the Scheme	Anonymised tenant	To continue improvements for people who live in the properties covered by the scheme, and to encourage non-student neighbours to stay in the area	Noted
Support for the Scheme	Anonymised tenant	"Street scene" in Plasnewydd requires dramatic improvement as the area is overrun by litter. If this scheme were to continue, hopefully it would mean enforcement in this area would start to be undertaken and residents may begin to see a change.	Noted
Support for the Scheme	Anonymised tenant	For one, the current benefits as a direct result from the Licensing declaration will be sustained and embraced by all tenants. Moreover, the area is named in Welsh - retaining the name and the area as an official one would be in line with the Welsh Government's undertaken projects to preserve the Welsh language and increase the number of native language speakers to 1 million by 2050.	Noted

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area**  
**Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
<b>Other responses received in support of the re-declaration of the Scheme</b>			
Support for the Scheme	K McNeff – Landlord/agent	Having read through the consultation report, I would be proud and pleased to offer endorsement for additional licensing for HMO's in Plasnewydd	Noted
Support for the Scheme	Councillor Dan De'Ath	I've completed the survey but just wanted to reiterate that as a local Member I very much support plans to re declare Plasnewydd an additional licensing area.	Noted
Support for the Scheme	Councillor Sarah Merry on behalf of Cathays Ward Councillors	<p>We are writing to support the continuation of Additional Licensing in Plasnewydd.</p> <p>As Cathays councillors we have many common landlords with Plasnewydd and many of our residents will crisscross the boundary as much of the private rental market in the two areas are similar so a common approach seems sensible.</p> <p>While the standard of housing may have improved over the years there are still particular issues associated with HMO's and the concentrations seen in Plasnewydd and Cathays. We believe that Additional Licensing gives an extra tool to the council to raise the standards of housing. We also believe that due to the concentrations in the two areas we also need the extra powers to deal with some of the impact on the wider area.</p>	Noted
Support for the Scheme	J Sadler - Waste Strategy Manager Cardiff Council	<p>Waste Management would support the extension of the Additional Licensing Area of Plasnewydd as it provides the Council with additional powers in managing the Street Scene and improved Local Environmental Quality.</p> <p>However it should be noted that:</p> <ul style="list-style-type: none"> <li>- Levels of support in the student area depend on funding provided by the Universities.</li> <li>- Get it Out for Cardiff was rebranded as 'Love when you Leave'.</li> <li>- Landlords are responsible for waste in the property once tenants have vacated.</li> </ul>	Noted.

**Cardiff Council Public Consultation on the Proposal to Re-designate Plasnewydd as an Additional Licensing Area  
Schedule of Consultation Comments**

<b>Topic</b>	<b>Consultee</b>	<b>Comments</b>	<b>Response</b>
Support for the Scheme	Sarah Spencer Accommodation Services Supervisor Cardiff Metropolitan University	<p>I write to confirm that I support the renewal of the additional licensing area renewal in Plasnewydd. A large number of Cardiff Met students have already benefited from the licensing provisions but there is more to do.</p> <p>We work closely with the Private Sector Housing team to identify non-compliant landlords as we are often the first point of contact for any students that are experiencing problems with their rental properties or landlords and we are still having issues raised about properties that aren't licenced in the area.</p> <p>The renewal will help to continue the excellent work already carried out to improve standards for our students who are often a vulnerable group.</p>	Noted
Support for the Scheme	L Cotton – Plasnewydd Resident	I support this proposal	Noted.