

Objection	Response
<i>Reasons for Proposing the Scheme</i>	
How is this database going to improve condition of rented properties?	The proposed licence conditions place a responsibility on landlords to ensure that their properties meet a required standard. For example, they require landlords to ensure that safety certificates for gas and electricity are in place and to be pro-active in improving their properties so that hazards that affect the health and safety of tenants are reduced to a safer level. Our evidence in relation to poor property conditions is up to date and shows that a significant number of properties are not meeting that standard. The Council believes that, through inspection and enforcement, licensing will bring about a significant improvement in compliance with required property conditions.
There is already sufficient legislation to stamp out rogue landlords	It is accepted that there is legislation and powers available to deal with poor management and poor housing conditions for example, the Housing Act 2004 (and associated regulations), Environmental Protection Act and the Prevention of Damage by Pests Act. This legislation is however primarily reactive and can largely only be used once problems have arisen. Selective Licensing requires licence holders to be proactive in managing their properties. It offers further powers to ensure that the licence holder is a fit and proper person, and that satisfactory management arrangements are in place. The licence holder must comply with a number of licence conditions. All of this will help to tackle the problems which our evidence has revealed. The enforcement and compliance work being undertaken as part of the current selective, mandatory and additional licensing schemes play a key part in Nottingham and elsewhere in identifying and removing rogue landlords and demonstrates that there is still work to be done which the proactive powers of licensing are best placed to accomplish. In the current scheme the Council had been successful in undertaking prosecutions in relation to 27 offences and had issued 47 civil penalty notices as per the Executive Board report in May. Some of these landlords are portfolio landlords owning multiple properties and have since sold their properties in the city. This type of enforcement activity would continue in the proposed designation.
This (a selective licensing scheme) could be achieved much better by simply enforcing statutory requirements and funding the enforcement scheme through penalties issued by the enforcement team	The Council has used and continues to use a range of enforcement powers to deal positively with issues affecting private rented houses, as well as working with partners to improve wider housing issues, ASB and criminality within the private rented sector. In relation to rogue landlords, enforcement and compliance work is targeted with complaints responded to on a risk assessed/prioritised activity basis. Proactive work is also undertaken to support burglary reduction and reduce excess cold / fuel poverty in parts of the city. The current proposal identifies an approach for prioritised activity where the evidence from the Building Research Establishment (BRE) study shows the poorest housing conditions. Likewise, there will be prioritised work in areas with high levels of crime/ ASB, and where the Council has received complaints from tenants and/or there is rogue landlord behaviour. Selective Licensing is a proactive enforcement tool which works alongside existing powers to support a safer private rented sector of a defined minimum standard.

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<p>Other authorities have rejected the need for Selective Licensing and have adopted other methods of dealing with these issues without driving up rents to the extent that licensing does.</p>	<p>No specific authorities were cited in this response, so it is difficult to comment. The Council is however aware of many authorities who have implemented selective licensing because they see it as the most appropriate tool to deal with problems in their area. Selective Licensing is a discretionary power which the Housing Act made available to those Councils who are able to demonstrate that they meet the relevant statutory tests, and which choose to use it. The Council believes that the introduction of selective, additional and mandatory licensing have been a success for Nottingham and that it has the evidence and grounds to demonstrate that the proposed selective licensing Designation and scheme will continue to deliver necessary improvements in the PRS which have begun to be demonstrated as a result of the first designation and scheme.(see below for comments regarding rent levels)</p>
<i>Proposals/evidence was flawed or incorrect</i>	
<p>Area is too large and covers affluent areas where there are no anti-social problems, poor property problems or high levels of crime.</p>	<p>The statistical evidence supports the proposed designation (area the proposed scheme would cover) The Council has taken a more critical approach to the required criteria compared to that taken when the 2018 designation was introduced by identifying areas which contain a high proportion of private rented property levels (PRS) plus meet 2 of the 4 statutory criteria which the Council feels are demonstrated in Nottingham (poor property conditions, high crime, high ASB, deprivation). The 2018 designation had been based on high proportion of PRS plus 1 criteria. This has resulted in a smaller designation both geographically and in the number of properties. The statistical evidence section contained in Appendix 1 of the May report to Executive Board showed that a significant proportion of the City’s geographical area and the eligible PRS property it contains met two or more of the statutory criteria for inclusion in a selective licensing designation.</p>
<p>I'm not convinced about the general statements about conditions/ ASB/ crime/ deprivation in the private rented sector and even more so if this is in comparison to social housing. How exactly is taxing landlords going to do anything about crime and deprivation - what are we expected to do about that as landlords?</p>	<p>Selective Licensing powers are not a tax. They provide a legislative approach to tackle acknowledged problems within the PRS where they exist, and the Council can demonstrate that it meets defined statutory tests and criteria. The legislation does not permit Selective Licensing to be applied to social housing though the Council acknowledges that ASB can be a problem in any housing tenure. The Council has demonstrated the positive correlation between PRS and ASB levels and the qualitative evidence suggests that issues with PRS properties are more difficult to address under present conditions. Landlords are required to manage their properties effectively as part of the proposed licence conditions, and they can do this by having robust tenancy agreements in which breaches are dealt with properly. The licence holder has a responsibility to have a plan in place to tackle ASB perpetrated by the tenants at their property. Through licence conditions the landlord is also required to report any crime at the property. In relation to deprivation, improving property conditions can improve the ‘Living Environment’ domain within the measure of deprivation used by the Government. Compliance with the selective licensing scheme therefore can and does have a beneficial effect on deprivation levels albeit landlords might not realise this effect.</p>

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	<p>The evidence demonstrates that there is a higher incidence of the issues mentioned in areas that have higher proportion of PRS properties and therefore this increase is reasonably attributable to this tenure's presence. The methodology included areas of high PRS that showed comparative poor performance on not one, but two, of these issues.</p> <p>The methodology does not need to show that PRS is better or worse than social housing, because social housing is already regulated, rather it needs to show that there are issues that cannot be addressed without a scheme of regulation of PRS too. It is worth noting that only areas with a high amount of PRS properties are included under the proposed scheme, so areas with high amount of issues and a high amount of social housing are omitted, because we know that these issues are unlikely attributed to the PRS alone or in significant part, so a PRS licensing scheme is not the way to remedy them.</p> <p>Licensing not being a tax notwithstanding, its purpose is to ensure fit standards of accommodation in that sector and to ensure that all Nottingham Citizens regardless of tenure have a safe and properly managed home. This include the home being in good repair so as to be secure and help prevent burglary for example, the home being in reasonable repair so as not be excessively cold or difficult or heat so as to put citizens into fuel poverty and that the property is properly managed so as not to give rise to crime involving, or exploitation of, tenants. It is noteworthy that deprivation, of the types other than employment and education (which tend towards social housing areas), is assessed as being much worse in PRS areas especially around property condition and living environment, because without licensing there is no regulation to ensure decent or consistent standards and there is an increasing diversity of vulnerable people resorting to the sector for housing, who cannot effectively challenge landlords to bring about change themselves</p>
<p>This consultation process isn't really a consultation process. It's the city council just doing their jobs and notifying the local residents about the changes.</p>	<p>The decision whether to implement a scheme of selective licensing is not predetermined. A final decision as to whether a scheme should be submitted to the Secretary of State for approval will be made by Executive Board having reviewed the outcomes of the consultation and consideration of whether the various statutory tests to justify the scheme have been met. The decision to approve a designation on the scale being considered ultimately lies with DLUHC and not with the Council. The Council however has offered multiple ways citizens can participate in the consultation including live and virtual events, social media and the survey which was both online and available in print on request.</p>
<p><i>Selective licensing is a tax on landlords</i></p>	
<p>Just seems like a scheme for the council to generate extra income</p>	<p>The fee reflects the costs of administering the scheme. The Council has used the most recent version of the Local Government Association toolkit available for precisely this type of process to set the fee. The Council is not allowed to make a profit from the licence fee and the fee has not been calculated on a profit-making basis.</p>
<p><i>Selective licensing will have a negative effect on good landlords</i></p>	

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This penalises good landlords who look after their properties.	The Council wants to work with good landlords in the overall interest of the sector, and part of this means rewarding landlords who comply, engage and deliver high standards. Accordingly, provision for reduced fees for accredited landlords is proposed as part of the scheme. Licensing is not transactional nor is it a penalty, it gives a landlord the legal right to let a property within the Designation if it meets the bar of required standards.
As a Landlord of one single property that we maintain to the same standard as our own, the licence does not benefit our tenant or us at all.	Whilst there are undoubtedly many well managed properties, the evidence outlined in Appendix One of the April Executive Board report indicates that this is not across the board and that the statutory tests for justifying a scheme have been met. The benefits which it is believed will accrue from such a scheme are also outlined in Appendix One of the May Executive Board report. Where the management of rented homes is ineffective the scheme will compel landlords to manage their properties properly and deal with the problems which have been identified. A better private rented sector over all will benefit all citizens including landlords and tenants who operate and live in properties of a good standard by raising the overall quality of the sector within the city.
Accredited landlords should pay a lower fee, but the scheme does not take into account landlords who use accredited management agents; this should result in a lower fee than proposed. Management agents who are ARLA-qualified provide an additional level of professional competence to the PRS. To not take account of this in the fee structure is wrong. Landlords pay money for a professional management service; this should be acknowledged in the selective licensing fee rates.	A lower fee for accredited landlords has been recommended in order to recognise good landlords and to encourage more landlords to become accredited. The number of accredited landlords increased significantly when the first scheme was introduced. The same applies to properties managed by managing agents. However, the use of a managing agent is no guarantee in itself that properties will meet the required standard in any given case. When consulting on the 2018 designation the Council did consider broadening accreditation to include accredited agents such as those accredited with ARLA. However, the current accreditation partners the Council works with have a good track record of inspections, support, and removal of landlords that fail in their accreditation duties. The assessment of other suggested bodies showed that they did not provide the same level and range of inspection and monitoring of those they accredited to provide similar reassurances to the Council as to the fitness and suitability of the agents that they accredited.
Why should accredited landlords have to pay a fee at all?	The houses of accredited landlords will still be required to be licensed under the designation and it is appropriate therefore that a fee be charged. However, as mentioned in the responses above a reduction in fees for accredited landlords is included within the proposal.
This will lead to accredited landlords potentially selling properties so there will be less properties.	This is obviously the opposite of what the Council wants to achieve. The Council has seen no evidence of the existing (selective, additional and mandatory) licensing schemes driving good landlords out of the market. Conversely, where the Council has taken enforcement action against poor landlords, some have left the market. In the Council's opinion this is a positive outcome. There is a constant churn in the housing sector with landlords arriving and leaving the market for a whole range of reasons, and overall, the private rented sector has grown and continues to grow in Nottingham City.
<i>Fees are too high</i>	

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There needs to be a bigger differential to encourage Landlords to seek accreditation	The Council wants to ensure a sustainable scheme and some of the work required for both accredited and non-accredited landlords is the same. The savings for accredited landlords are partly based on fewer inspections and checks as they should be up to a good standard already and may also have been recently inspected by an accreditation partner. It is also anticipated that there shall be fewer issues to resolve following any inspection, which again, keeps the costs lower. The Council is satisfied that the differential is appropriate and proportionate.
The fees are too high for compliant landlords. I would propose that the scheme have a minimal admin fee and be funded by larger penalties on non-compliant landlords thereby acting as a deterrent while not penalising those who are already good landlords.	The Council agrees that good landlords should be recognised and that they should pay less. This is why there is a proposed lower fee for accredited landlords. The licensing fee gives a landlord the legal right to let within the designation as long as their property meets the required standards and the scheme gives the Council proactive powers of enforcement, it is not a transaction whereby a service is provided for the fee. Penalties are set in relation to the Council's Civil Financial Penalties Policy and legislation.
Why is the scheme licensing landlords yet charging per property? If it is about landlords, then register the landlords and cost should be just "PER LANDLORD".	The Housing Act 2004 specifically requires each house that the landlord owns to be licensed. Landlords cannot be exempt from the scheme because they have a small portfolio. The legislation is clear that it applies to all "Houses" as defined in sections 79 and 99 of the Housing Act 2004 unless they are specifically exempted. The Council does not have the power to create its own exemptions or to licence landlords as opposed to their houses.
The fees are too expensive to be paid upfront in one instalment, especially for landlords with multiple properties/large portfolios	The Council has considered fee payment models following comments in the consultation and caselaw about fee payments which apply to most types of licensing. The proposals are that landlords will have to pay the fee in two instalments. Once the Council has determined the application it will grant or refuse it. If the Council grants the licence the second part of the fee will be required. Payments by instalments were considered as an option, but due to the higher administrative costs and potential risks around missed and non- payments it is not intended to pursue this other than by way of a two-part fee payment.
<i>Outcome of selective licensing will be increased rents</i>	
The costs involved are passed onto tenants via their rent increases	The Council recognises that a possible impact of the introduction of a licensing scheme is that landlords will seek to pass on the fees by increasing rents. This could have an adverse effect on tenants in the designated area; however, in a competitive market it is perhaps over-simplistic and speculative to say that all rents will automatically rise. If a landlord has already increased their rent when the first designation was introduced to pay for the licence, the licence fee should already be included in the rent, so there should be no reason to increase rents further. In any event the actual cost over five years based on the proposed accredited licence fee is quite small and equates to £2.50 per week. Currently there are many issues affecting the private rented market nationally. High demand, low supply, post covid backlog of movers, growing population and rising inflation and interest rates are some of the factors which have resulted in rents rising across the country whether within a licensing scheme designation or not. For

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	example, the highest rent increases can be found in the South West which by comparison has less Selective Licensing designations than other parts of the country where rents have risen less.
<i>The proposals will not tackle issue of rogue landlords</i>	
The council should target more precisely properties where there are issues. The sledgehammer approach is unfair, inefficient and unnecessary.	The Council has followed the legislation and guidance when considering the proposals for the Designation. There have been successes arising from 2018 designation which mean poor properties have been improved and poor landlords have been forced out of the market because of the enforcement action undertaken by the Council. Designation addresses the problems in the areas where robust evidence has been established showing the need for a licensing scheme. The scheme is not intended to penalise good landlords. There will continue to be a dedicated enforcement team to tackle those landlords that fail to comply with the requirements.
Rogue landlords have found ways around the scheme or still not signed up	The Council has undertaken enforcement action against a number of landlords under the current designation, some of whom have left the market because of the Council's action. Rogue landlords may well try to avoid any further licensing scheme, but it will be a legal requirement for them to apply for a licence. The onus will then be on enforcement activity and working with partners to identify, penalise and if appropriate prosecute offending landlords. The Council is confident that landlords who avoid licensing will be identified and dealt with. The Council is proposing to continue to employ a team of people to support investigations and enforcement activity to target landlords who avoid licensing their properties, as it has done in the first scheme, building on this work.
<i>Other</i>	
The squeeze on already tight landlord profits will force many out of business, adding to housing issues.	The Council is unaware of any evidence that supports this claim. There is no evidence of this from selective, mandatory or additional licensing and there is no evidence from other authorities with similar schemes that this is the case. Much of the work required to comply with licence conditions should already be in place in any case. The licensing conditions and any additional works required are in place to provide basic standards of health, safety and welfare of the occupants. Good, compliant landlords will not need to spend significant sums of money in order to meet the licence conditions.
For a professional, corporate landlord / investor who is already providing an excellent high quality fully accredited and managed product this is merely a tax on doing business in Nottingham. The result of which being investors and developers will either move capital to other projects away from the Nottingham without such a local tax burden and/or increase rents to maintain returns.	The City has a buoyant private rented sector housing market and the Council does not agree that future investment in the city will be deterred by the scheme. There are currently a number of investors looking to develop new PRS schemes in full awareness of the Council's current schemes and proposals for a second scheme of selective licensing. Housing markets are complex with a number of different factors affecting why people invest. As the scheme is implemented and the sector improves, it may be that landlords are keen to invest in a well-regulated market which is not being undermined by poor housing standards.

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<p>All this will do is take money out of the pockets of good landlords which might have been used to improve their properties.</p>	<p>The scheme has proposed a fee that the Council believes to be reasonable and landlords will decide how they pay for the scheme. Landlords should be able to effectively plan their finances and the fee should not impact negatively on how they improve their properties.</p>
<p>The scheme is weak as too much onus is placed on the landlord without any support to help landlords deal with problematic tenants.</p>	<p>The Council recognises that tenants can cause problems. However, landlords do have responsibilities regarding managing the impact of their tenants' behaviour. The Council is proposing to continue to employ additional officers to support landlords tackling tenants causing ASB, as well as providing support to tenants who are renting from a rogue / criminal landlord. This will be in addition to the work undertaken by front line officers such as Community Protection Officers (CPOs).</p>
<p>Way too expensive, causing issues for us tenants in Nottingham and driving up homelessness.</p>	<p>The DCLG guidance issued by the Government states that councils must show that a proposed selective licensing scheme is consistent with their overall housing strategy and co-ordinated with procedures for homelessness. Given this, how licensing would impact upon homelessness was considered in some detail and can be seen in Appendix One of the May 2022 Executive Board Report section 5.7: https://committee.nottinghamcity.gov.uk/documents/s134040/Enc.%201%20for%20Proposal%20for%20a%20Scheme%20of%20Selective%20Licensing%20for%20Private%20Rented%20Houses.pdf</p> <p>Overall, the impact was considered to be a positive one. The Council is using the PRS more and more as both a prevention solution and a means of discharging duties as its size increases and social housing reduces. Therefore, a scheme which gives greater assurances of good management and good property conditions fits very well with the Council's approach to homelessness. It is assumed that this comment is suggesting that there will be a negative impact on homelessness, and that this is because of the potential rent rises leading to tenants being unable to afford their rent and being evicted, or the rents increasing so much that the properties concerned are no longer affordable to homeless people whom the Council is trying to assist via the PRS. The Council will work with NPRAS colleagues to consider a significant licence application fee discount to new landlords that engage and sign up to the NPRAS process for the duration of the scheme. This will assist in creating an increase in properties available for the Council to discharge their homelessness duty. The issue of rent increases generally is dealt with elsewhere in this document: it is acknowledged as a risk; however, the amounts are relatively small, and landlords will make their own business decisions about what they need to do to remain competitive. The Council's belief is that landlords should not pass on the cost of licensing to their tenants. However, any landlords already licensed as part of the current scheme should not need to add the cost of a second licence to rents if they included the costs in their rent for the first scheme.</p>
<p>I rented out my house through a reputable letting agent and paid their fee as such. This meant that the property was up to standard and safety checks maintained. I felt that having to pay the selective licensing fee and do a</p>	<p>Using a letting agent does not guarantee that legal standards or licensing conditions are being met. Assuming an agent is meeting these standards is not good practice, as the fit and proper person a landlord is responsible for meeting the required standards and should make independent checks of their property / properties to be assured of this and protect themselves from any failure to meet them. Having a required quality standard for private rented property is an assurance to all involved in the</p>

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training course was inappropriate in the circumstances and also demeaning to the letting agent businesses	market and citizens who live alongside privately rented properties. Good agents and landlords who are informed regarding these standards should already be meeting them and be confident in their knowledge on the subject.
Huge delays in time processing licences	<p>The Council acknowledges the teething problems with the online portal despite a pilot trial with a selection of landlords prior to go live in respect of the 2018 designation. The Council has apologised to consultees affected by these issues and shared learning and achievement of delivering a better experience now in scheme 1 (speed of application is greatly improved and less complex) and will apply this learning for scheme 2 alongside being clear about timelines.</p> <p>In Annex iv of the May Executive Board Report the Council stated “What we assumed - That as much information as necessary at the application stage would assist with issuing and determining the licence. What we found - Requiring applicants to provide lots of information meant that there was more information to input into the application process for the landlord and also for the Council to review and check it was provided correctly at the time. The information and the checks undertaken at the time were helpful, but it did slow down the licensing process, taking longer for the documents to be issued. What learning and changes we made as a result - The Council has continued to review its processes to ensure they are as streamlined and efficient as possible for applicants and the Council so they can be more swiftly brought into the licensing regulatory framework”</p> <p>The Council therefore feels that it has acknowledged problems with its initial processes and the delays caused and has addressed them by reducing the time taken to determine licences to weeks rather than months (other than a minor number of complex cases).</p>
Where & what is your evidence for this working?	<p>The evidence can be found in the May Executive Board Report Appendix One here: https://committee.nottinghamcity.gov.uk/documents/s134040/Enc.%201%20for%20Proposal%20for%20a%20Scheme%20of%20Selective%20Licensing%20for%20Private%20Rented%20Houses.pdf</p>
Tenants are taking advantage of the licensing scheme to make malicious complaints about the property when they are in rent arrears	The Council’s housing teams are available to support landlords with problem tenants. Please contact them at selective.licensing@nottinghamcity.gov.uk or call 01159152020 if you would like some advice.
Very few inspections taking place so money making exercise for the council	Licensing is not transactional, being licensed gives a landlord the legal right to let their property within the designation and sets a standard for any property within it. Its intention is to regulate the designation, target problem properties and raise standards. Inspections will continue for the life of each licence, many of which run beyond the five-year window of each licensing scheme. By September 2022 the Council had inspected 6,246 properties, it is estimated for the proposed Designation of

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	<p>approximately 31,000 properties of all property types that 50% of non-accredited and 10% of accredited would be inspected</p> <p>Learning from the first scheme has matured the approach to performance. Should the scheme be confirmed by the Secretary of State a clearer performance framework including outputs and outcomes will be built on from the first scheme enabling better understanding of scheme impact.</p>
<p>Purchases of current licenses should roll over. I had mine less than a year ago. How can you expect me to pay again?</p>	<p>Each licence for a property usually lasts for 5 years, you will not need a new licence until your old one expires.</p>
<p>That the making of a Designation could be challenged via Judicial Review in relation to the bulleted points opposite</p>	<p>Delays in dealing with applications</p> <p>Regarding the initial slow processing of applications at the early stages of scheme 1 – in the May Report, in Annex iv “What we assumed - That as much information as necessary at the application stage would assist with issuing and determining the licence. What we found - Requiring applicants to provide lots of information meant that there was more information to input into the application process for the landlord and also for the Council to review and check it was provided correctly at the time. The information and the checks undertaken at the time were helpful, but it did slow down the licensing process, taking longer for the documents to be issued. What learning and changes we made as a result - The Council has continued to review its processes to ensure they are as streamlined and efficient as possible for applicants so they can be more swiftly brought into the licensing regulatory framework.” The Council therefore feels that it has acknowledged problems with its initial processes and the delays caused and has addressed them by reducing the time taken to determine licences to weeks rather than months (other than a minor number of complex cases).</p> <p>Comments regarding other tools available to achieve the Council’s strategic objectives for housing and the Councils strategic approach to Homelessness, Health, Energy Efficiency, Empty Homes given the Government’s Fairer Renting White Paper : “There is no requirement for a licensing scheme to support Minimum Energy Efficiency Standards (MEES) enforcement”. The making of a Designation would however significantly assist in achieving this objective in accordance with s81(4) (b) Selective Licensing intelligence allows PRS properties to be identified then the open access database for Energy Performance Certificates (EPCs) can be utilised to check the rating. Poor MEES ratings could be indicative of other issues around poor management, housing disrepair and a lack of proactive attitude by the landlord in dealing with issues at the property. This is where Selective Licensing can pick up on one issue such as a poor EPC rating and then tackle other issues relating to the property and landlord to make broader improvements to the property and how it’s managed.</p>

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<p>Further consultation comments were made regarding the Council’s strategic approach to Homelessness, Health, Energy Efficiency, Empty Homes and the government’s Fairer Renting White Paper. The Council’s response was to refer consultees to the following sections in the Appendix 1 of the report which went to Executive Board in May 2022.</p>	<p>On Homelessness 3.2.1 “The continued reliance on the PRS to support with homelessness duties means a need for the Council to ensure that the sector is well managed, provides good quality accommodation and tackles poor landlord practice where this exists. Selective Licensing can play a significant role in achieving this ambition. Firstly, it ensures that accommodation is safe and suitable and secondly it improves the management of PRS homes, which reduces the risk of people losing their homes – for example, it is not permissible to serve a section 21 eviction notice if a property is not licenced”. The Council is using the PRS more and more as both a prevention solution and a means of discharging duties as its size increases and social housing reduces. Therefore, a scheme which gives greater assurances of good management and good property conditions fits very well with the Council’s approach to homelessness.</p> <p>On Health (3.2.2) “We know that housing is a key determinant of health inequalities, so initiatives such as Selective Licensing which aim to improve housing conditions, can make a significant contribution to better health outcomes”</p> <p>On Energy Efficiency (3.2.7) “It is important that the Council understands the challenge it has in addressing the climate emergency to achieving its aims of being carbon neutral by 2028. Selective Licensing plays a part in achieving this, ensuring all rented homes have an up to date EPC allows the Council to target any available assistance towards tackling these poor housing conditions with lower EPC ratings” This section of Annex 1 thus demonstrates compliance with s 81 of the Act.</p> <p>On Empty Homes (3.2.3) “Selective Licensing can have a direct impact on the number of empty homes. Better quality and better managed PRS homes will be delivered via a licensing scheme, which will be less likely to become vacant for long periods of time and cause blight in neighbourhoods. Selective Licensing and our approach to empty homes go hand in hand in generally promoting a thriving, high quality private rented sector”</p> <p>On the Fairer Renting White Paper The paper had not been released when the May Report was published, is not legislation nor even a bill and given timescales for legislative changes is not a reason for delaying consideration of a potential new Designation. The Secretary of State will no doubt be fully aware of the paper and proposals for securing its aims when he considers a Designation should a decision be made to refer one to him. The White Paper cites Nottingham’s scheme as a case study, and highlights some of the good practice delivered by the scheme.</p>