

Appendix 9a: Proposal to designate a Selective Licensing scheme in the Central area Final Proposal July 2018

Blackpool Council



Proposal to designate a selective licensing scheme in Central Area, Blackpool

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1. Introduction – About the Central Area

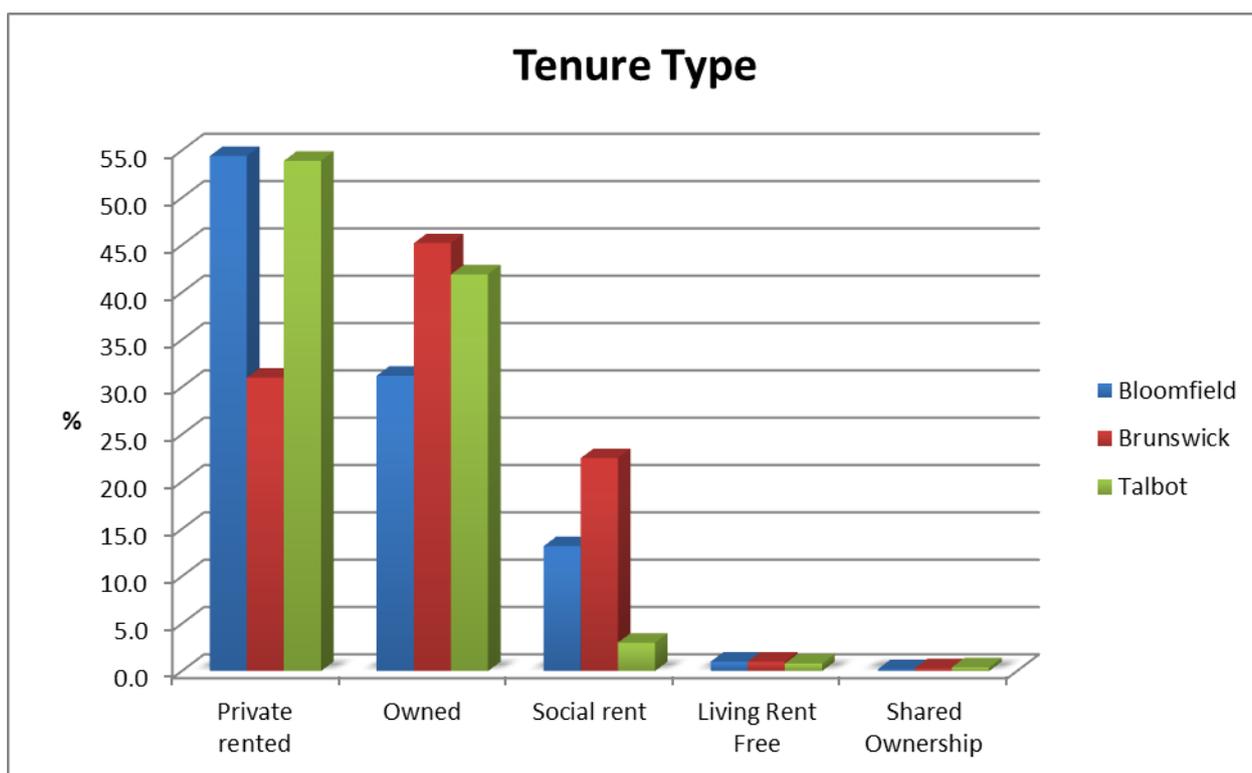
Blackpool is a British institution, and a global phenomenon – the world’s first mass market seaside resort, with a proud heritage stretching back over 150 years. However, Blackpool is now the site of one of the country’s greatest concentrations of socio-economic deprivation as a consequence of decades of decline in traditional tourism sectors. According to the Indices of Multiple Deprivation Blackpool was ranked the 4th most deprived authority in England in 2015 – up two places from 2010.

Blackpool has a similar proportion of owner occupiers compared to national (England) levels, but almost double the proportion of Private Rented accommodation (26.1% vs 16.8%). This is driven largely by changes in the seaside economies with many former guest houses converting to flats, and fluctuations in seasonal work creating demand for temporary accommodation in resort areas.

The Central area includes parts of three wards, i) Talbot, ii) Brunswick and iii) Bloomfield. The chart below shows a breakdown of the tenure mix within this area¹. We are satisfied that this is a high proportion of privately rented accommodation and also satisfied that the majority of privately rented properties in this area are occupied either under assured tenancies or licences to occupy.

¹ Local Government Association LG Inform Plus Data

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Blackpool in general has a problem with transience; i.e. the frequent movement of people in the town, particularly within the Central area. High levels of turnover affect community cohesion and stability.

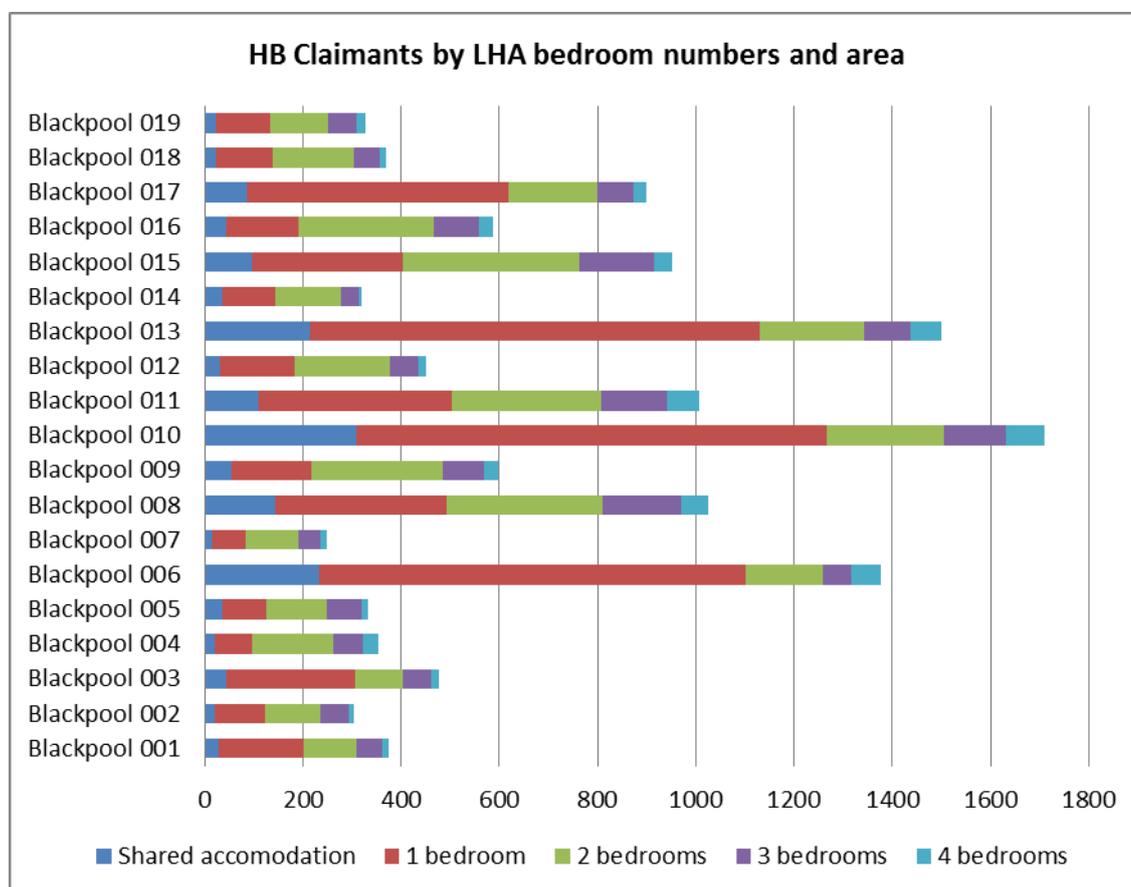
Analysis of new Housing Benefit claimants between April 2013 and March 2014 showed the following for each ward:

- Bloomfield - 11% of claimants had a previous address in Blackpool, whilst 89% had a previous address outside of Blackpool
- Brunswick - 16% of claimants had a previous Blackpool address whilst 84% had a previous address outside of Blackpool
- Talbot - 15% of claimants had a previous address inside Blackpool, whilst 85% had a previous address outside of Blackpool

A recent study of changes to GPs' address registers (over 2 years) found all three wards in the Central area have higher inward migration moves than the overall Blackpool average. The net population change for each of the three areas gave the three highest increases in population of any Council wards.

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Transience in the Central area is driven by the dominance of the private rented sector in the area, focused on low income households, with an over-representation of small flats. The Central area is approximately aligned with Medium Super Output areas 010, 011 and 013 in the Housing Benefit information below, showing high claimant numbers from the private rented sector and an emphasis on small households / units of accommodation:



2. What is Selective Licensing?

Selective Licensing is a regulatory tool available to Local Authorities to enable the improvement the management and conditions of properties within the privately rented sector (parts 2 and 3 of the Housing Act 2004).

There are two types of scheme that can be considered:

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1. Additional Licensing - enables Local Authorities to address issues in smaller Houses of Multiple Occupation (HMOs) with relation to property conditions (internal and external) as well as management conditions.
2. Selective Licensing – enables Local Authorities to address the management of properties and tackle ASB.

Guidance states that if a selective licensing designation will impact more than 20% of privately rented properties within the Borough then the Local Authority must seek Secretary of State Confirmation. Given the existing Claremont selective licensing scheme, a further designation within the proposed area will mean more than 20% of properties within Blackpool will be within selective licensing areas and therefore Blackpool Council will need to seek Secretary of State Confirmation.

Central Government introduced new criteria to enable Local Authorities to designate a selective licensing scheme (2015). The guidelines state that a selective licensing designation “*may be made if the area to which it relates satisfies one or more of the following conditions:*

- *low housing demand*
- *a significant and persistent problem caused by anti-social behaviour*
- *poor property conditions*
- *high levels of migration*
- *high levels of deprivation*
- *high levels of crime”²*

The Guidance further goes on to say that on the grounds of property conditions, migration, deprivation and crime, the local housing authority may only make a designation if the area has a high proportion of property in the private rented sector.

Properties covered by Selective Licensing

² (“Selective licensing in the private rented sector, A guide for local authorities”, March 2015)

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By making the designation, all privately rented properties which fall under selective licensing in the designated area will require a licence. Owners of rented properties will be required to make an application to the Council for a licence and will need to nominate either the Manager or Owner to be the licence holder.

Section 79 (2) of the Housing Act details properties covered by selective licensing (defined as a whole house) that are occupied either under:

- A single tenancy or licence
- Under two or more tenancies or licences in respect of different dwellings contained in it.

This definition has been interpreted to mean the following:

- ❖ A house let under a single tenancy only requires one licence.
- ❖ Where the freeholder of a building containing a number of flats, owns all the flats and lets those flats on tenancies or licences (not including long leasehold), then the freeholder will be required to apply for one licence to cover the whole building containing the flats.
- ❖ A building containing flats where each flat is owned by a long leaseholder and the flats are individually rented out, the leaseholder will be required to apply for a licence for their individual flat.
- ❖ A building containing flats where there is a mixture of different long leaseholders and accommodation owned by the freeholder, each of the leaseholders would require an individual licence for their flat or flats and the remaining accommodation would require a licence applied for by the freeholder.
- ❖ Landlords who own more than one 'house' under the above definitions within the designated area will need to apply for a licence for each of those houses.

Properties used as HMO's which are not subject to Mandatory or Additional Licensing schemes, will need a selective licence.

Licence Applications and Fees

Section 87 of the Housing Act 2004 details the application process for a licence.

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In particular this section states that an application must be made in accordance with such requirements as specified by the authority. It also states that the authority may require the application to be accompanied by a fee fixed by the authority.

When fixing fees under this section of the Act, the local housing authority may take into account all costs incurred by the authority in carrying out their functions under this part of the legislation and all costs incurred in carrying out their functions under Part 4 of the Act chapter 1 which relates to management orders.

The application process is detailed within the Act and there are subsequent regulations detailing the contents of an application form. This includes providing information on the property layout, certificates for gas, furniture and fire safety. The Licensing and management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 schedule 2 provides full details on what must be included within an application, including information to determine if the manager or proposed licence holder is a fit and proper person.

This requires the declaration of any unspent convictions, unlawful discrimination and prosecutions under housing, public health, environmental health or landlord and tenant law. The Council will make full checks into a person's 'fit and proper' status and will also request full Police checks if necessary and request owners to submit a full DBS clearance via Disclosure Scotland.

Once an application has been made the local authority must consider whether to grant or refuse the licence and the licence holder must first pass the Fit and Proper Person Test as defined by the Housing Act 2004 (section 66 (2)). This test specifies that the local authority must take into account evidence of any of the conduct detailed below and also applies to anyone “associated or formerly associated with the proposed licence holder or manager “whether on a personal, work or other basis”, if relevant. The matters that the local authority needs to have a regard to are:

- Any offence involving fraud, or other dishonesty, or violence or drugs in section 3 of the Sex Offences Act 2003 practised unlawful discrimination of the law in connection with the carrying out of any business
- Contravened any provision of the law relating to housing or landlord and tenant law – illegal eviction etc.
- Acted other than in accordance with any code of practice for the management of the properties.

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N.B. Any “spent” convictions cannot be taken into account. However a lack of conviction may not mean that the incident was not relevant. The manager must send in with their application proof of their status and that they do not have any unspent convictions as specified above.

In the event that the landlord would not pass the fit and proper person test then he/she can nominate a manager in their place who must pass this test. If the local authority is not satisfied then it must refuse the application and give its reasons for this. The local authority must grant a licence if it is satisfied that:

- The property is reasonably suitable
- The licence holder would be a fit and proper person

Conditions and Penalties

If the licence is granted it will have conditions attached to it. Section 90 and Schedule 4 of the Act details the licence conditions that must be included, however there is provision for the local authority to add further conditions that are either specific to the licence in question or that are locally agreed to address specific issues.

A licence will be valid for 5 years; however, the local authority has the discretion to grant the licence for a shorter period of time where there are problems with the application such as evidence of insufficient management.

Once the licence has been issued the licence holder must comply with the conditions attached to the licence. Where there is a breach of those conditions the licence holder may be prosecuted. If the licence application is refused the local authority must instigate an interim management order. This is where the local authority takes over the management of the property for up to one year or until such time as the owner is able to rectify the reasons for the licence being refused. If the owner is unable to rectify the problems then the local authority can apply for a final management order where they take on the management for up to 5 years.

In some circumstances rather than refuse the licence it may be possible for the owner to apply for a temporary exemption notice under section 86 of the Act. This allows 3 months for the owner to take such steps as are necessary so the property no longer requires a licence. Where a property requires a licence but the owner has not applied for one the owner can be prosecuted. Failing to apply for a licence could lead to prosecution and a fine of up to £20,000.

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In addition to the fine there is a provision under section 96 of the Act for a Rent Repayment Order. This allows amounts paid in respect of a house or other periodical payment payable in connection with a tenancy or licence to be recovered for the period that the property should have been licensed.

Under section 98 of the Act there is also a restriction on terminating tenancies where a property is not licensed. This section states that *'No section 21 notice may be given in relation to a short hold tenancy of the whole or part of an unlicensed house so long as it remains a house'*.

3. Why is selective licensing being introduced in the Central area?

Improving the quality of private sector properties is a key strategic housing objective for Blackpool Council. The private rented sector accounts for 26% of Blackpool's total housing stock and therefore it is crucial that a high standard of accommodation and management is available for Blackpool residents in this sector. The private rented sector plays an important role in meeting wider council strategies – these are covered in more details in section 5.

The vision from Blackpool Council's Plan 2015-20 is to be the UK's number one family resort with a thriving economy that supports a happy and proud community. In order to make this vision a reality Blackpool needs to overcome core challenges. Selective Licensing supports Priority 1 of Blackpool Council's Plan – The economy: Maximising growth and opportunity across Blackpool.

The need to reduce transience, stabilise communities and improve the quality of private homes are identified as key housing and community safety projects. Selective licensing is one tool being used to support Blackpool Council to achieve these ambitious goals.

The Council acknowledges that whilst there are private sector properties that provide a good level of accommodation and are well managed by landlords, there are many properties that fall below acceptable standards. The introduction of selective licensing will address this issue and encourage both private sector landlords and tenants to play a more active part in the improvement of their neighbourhoods.

Any consideration of Blackpool's economy cannot ignore the failing housing market in parts of the town. Blackpool Council has an obligation to intervene to tackle housing market failure in inner Blackpool where an acute structural imbalance is supporting accelerated levels of socio-economic deprivation. Every year some 8,000 people move into Blackpool without support networks, with the majority renting properties in inner Blackpool, with the Central area at its heart. This is driven by the widespread

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availability of cheap accommodation and poor quality conversions of Bed and Breakfast stock to Houses of Multiple Occupation (HMO's), which arose from the decline of the domestic tourist market from the 1960's onwards. Addressing poor quality housing and encouraging the formation of more stable communities is essential to the town's economic prosperity.

Selective licensing helps to stabilise tenants in better managed homes, reducing the high turnover that can lead to homelessness. There will be cases where tenants need to be re-housed from accommodation that is found to be an immediate risk to their health and safety. In these cases, the Enforcement team will work closely with the Housing Options service to ensure that alternative accommodation is made available.

4. Objectives for the introduction of Selective Licensing in the Central area of Blackpool

The local authority must ensure that:

- The exercise of power is consistent with their overall housing strategy AND
- A coordinated approach in connection with dealing with homelessness, anti-social behaviour, regeneration and empty properties affecting the private rented sector is taken and that licensing is combined with other action taken by them and others
- They have considered if there are any other courses of action available that might provide an effective method of achieving what the designation is intended to achieve AND
- That making the designation will significantly assist them to achieve the objective(s).

Additional licensing has already been introduced in the area, under section 56 of the Housing Act 2004 allowing the local authority to extend the Mandatory HMO licensing scheme to include other types of Houses in Multiple Occupation. Section 56 (2) states that;

'The authority must consider that a significant proportion of the HMOs of that description in the area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for those occupying the Houses in Multiple Occupation or for members of the public.'

The objectives for the introduction of selective licensing are to ensure that:

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- Landlords are 'fit and proper' persons
- Landlords offer good and fair management practices
- Protection is offered for vulnerable tenants from the worst housing conditions
- Landlords manage ASB effectively
- Strategic knowledge is available to support us in targeting the worst properties
- Bad landlords who refuse to improve their management and conditions will be forced out of the market
- Target areas will see improvements, making them safer and more desirable places to live
- As many enforcement actions as possible are taken against those landlords refusing to meet the minimum standards

Selective licensing in the Central area will be at the heart of a multi-agency approach to tackling a wide range of socio-economic issues that debilitate and blight the lives of residents. If we want Blackpool to be a place where people not just come, but come and stay, then we need to look at the problems holistically.

5. Links to Wider Council Strategies

Blackpool Council wants to sustain long-term improvements in the private rented sector and selective licensing is essential to improving the quality of management. Selective licensing supports the below wider council strategies:

Making Blackpool Better – Blackpool Council Housing Strategy 2018 - 2021

The draft Housing Strategy presents the Council's approach to address the housing issues within the borough. It sets the vision and priorities to support the delivery of the Council's plan to make Blackpool a great place to live in with a thriving economy that supports a happy and healthy community.

The Strategy is built around four key themes:

1. New housing supply
2. Improving the private rented sector
3. Stabilising lives

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4. Increasing delivery capacity

Blackpool Council Plan 2015-2020

The vision for the future of Blackpool is to create the UK's number one family resort with a thriving economy that supports a happy and healthy community who are proud of this unique town. The Council Plan focuses on two key areas: boosting the local economy by maximising growth and opportunity and creating, stronger, healthier, more resilient communities.

Town Centre Strategy 2013 – 2028

The vision for Blackpool Council's Town Centre Strategy 2013-28 is for *“Blackpool Town Centre to be a thriving heart of Britain's favourite resort, offering an all year-round high quality shopping, leisure, cultural and entertainment destinations”*

In order to achieve its vision the strategy recognises the importance of improving the quality of homes and buildings within the town centre and to ensure they are managed effectively. The proposed selective licensing scheme covers these areas, thus, being an effective tool to support the strategy outcomes.

Blackpool Local Plan Part 1: Core Strategy (2012 – 2027)

Selective Licensing supports a number of Goals and Objectives for Blackpool's Local Plan Part 1 including:

- Develop sustainable and safer neighbourhoods that are socially cohesive and well connected to jobs, shops, local community services including health and education, culture and leisure facilities
- Establish balanced and stable communities in the inner areas with sustainable housing regeneration and new landmark residential development which improves housing quality and choice
- Creates a healthy, safe, secure and attractive environment and public realm, which promotes local pride and a sense of place

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This strategy identifies the need to address the challenges associated with quality housing and unauthorised residential use within the proposed licensing areas which selective licensing will support to achieve.

Blackpool Community Safety Plan 2016-2019 (ASB)

This builds upon the Blackpool Community Safety Partnership 2012 Strategic Assessment and sets out the analysis of crime, disorder and substance misuse and has identified the priorities that are the greatest threat to local people and where successful interventions will improve the quality of life in Blackpool. These priorities are Domestic Abuse, Violent Crime, Substance Misuse, Drugs, Substance Misuse, Alcohol and Anti-Social Behaviour.

Selective licensing, combined with other measures, will support to address these priorities within the designated area.

Homelessness Prevention Strategy 2018-2021

The Homelessness Prevention Strategy 2018 recognises the expanding use of the private rented sector in Blackpool as important in preventing and relieving homelessness. This reflects the very limited supply of homes in the social rented sector. But many private rented sector homes offer poor quality accommodation and management and these tend to be the last resort for the most vulnerable people, and to be subject to frequent tenancy turnover, increasing incidences of homelessness.

Selective Licensing amongst other tools will work to improve standards of accommodation and address issues that could potentially result in private sector tenants presenting as homeless within the designated area.

6. Approaches already taken in the area and consideration of new approaches

We have already sought to address issues associated with poorly managed privately rented properties in the Central area in many ways:

- We have invested in Blackpool town centre but it currently has the highest rate of retail leakage of any UK primary urban area and its image is undermined by the close proximity of poorly managed privately rented homes.

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- We have established Blackpool Housing Company with an initial £26m of public investment to lead the process of structural change in inner Blackpool, including the Central area, acquiring and refurbishing homes and introducing higher standards of management. It also has a role to play in the general improvement of stock within the PRS. This is achieved by working closely with landlords encouraging them to raise the standards of their accommodation in exchange for the support package offered.
- We are currently undertaking the large scale redevelopment of 500 Council flats at Queens Park in the Brunswick ward, adjacent to the Central area, to deliver 191 attractive new homes. The second half of the re-development is currently starting on site, with completion due by November 2018. We are also facilitating the development of over 400 high quality new homes within the Central area at the Foxhall Village development. Both of these developments will complement the improvement of the private rented sector in the Central area, and together help to create a much more attractive and balanced housing offer.
- We have also invested in a transience team to reach out to vulnerable tenants. This is now independently funded following a successful bid to Government; however funding will end in September 2018. The team make contact with tenants and link them into support services and local community activities, training and employment. In this way, underlying problems are addressed and tenants start to develop in their confidence, skills, and sense of responsibility. This investment in pro-actively identifying and supporting vulnerable tenants is of considerable benefit to tenants themselves, their landlords, and the wider community. Interventions through selective licensing will assist in regenerating communities and neighbourhoods through improved management of properties by licence holders.
- Blackpool Council, the Police, and other agencies work together to tackle ASB in Blackpool. The Police are the primary agency in respect of reports of rowdy behaviour, neighbour disputes, vehicle nuisance or incidents of drug or substance misuse. Blackpool Council continues to work with a number of services and agencies to identify victims who are vulnerable and whose lives are seriously affected by ASB. Information is shared and resources combined to ensure effective action in dealing with perpetrators and supporting victims. Blackpool Council and Lancashire Constabulary have just launched a new joint working partnership which will see Council officers fully integrated into the Police Tactical Tasking Group; joint planning of activities and campaigns, as well as a new co-location of departments from both organisations.

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- Blackpool Council provides a response to noise complaints, dog barking and fouling, fly tipping and the removal of waste, graffiti and abandoned vehicles. Officers from The Council's Public Protection Department deal with a range of issues including those relating to the condition of housing and problems which relate to properties in the private rented sector.
- The Central area covers parts of Bloomfield, Brunswick and Talbot wards and there are Neighbourhood Policing Teams in each area, who have a policing base in the heart of the communities. Officers work from these bases daily, maximising their availability and visibility to local people. The neighbourhood policing teams work closely with the Council and other agencies within the Community Safety Partnership working to tackle problems and this partnership approach has an excellent track record in reducing ASB and solving other problems affecting communities. The Partnership's response to problems is coordinated through fortnightly tasking and coordinating meetings, where information is shared and action determined. The public can have their say at the monthly Police & Communities Together (PACT) meetings along with regular multi-agency 'walkabouts' coordinated by The Council identify issues affecting the physical environment.
- The Housing Enforcement Team is proactive in identifying issues affecting residents and in particular the tenants of privately rented accommodation where complaints are received, but they are reliant upon tenants making those complaints, something that tenants are not always confident to do for fear of being illegally evicted.
- The Police themselves respond to complaints of ASB and can back up Council staff where there are more serious public order issues, but since 2014's ASB, Crime and Policing Act, the Police rely on Council officers to use the most common tools of Community Protection Warnings and Notices. Council officers have issued a combination of over 1000 Community Protection Warnings and Notices, with further action taken in some cases. This is amongst the most actions taken anywhere in the country. We have achieved a 91% success rate of success in resolving the problem at the first stage, which can be attributed to the proactive and multi-agency approach we take to tackling issues.
- Another way in which Blackpool Council has sought other solutions to the problems experienced in the private rented sector in the area has been through the promotion of the Fylde Coast Landlords Accreditation Scheme, which was established in 2011 and was developed with the neighbouring councils of Fylde and Wyre, as well as with the Fylde Coast Landlords Forum and the Residential Landlords Association. The aim of the scheme was to promote good practice and

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self-certified standards as set out by all parties involved for landlords owning private rented sector property in the area and incentives were offered to landlords who sign up for the scheme.

Unfortunately the scheme failed to capture the interest of landlords, with less than 25 signed up for membership of it. In the Council's view, it will always be challenging to get widespread membership of voluntary accreditation schemes in a market like the one in the Central area of Blackpool, where tenants are undiscerning and many landlords are not interested in raising the quality of their offer. Accreditation schemes are least likely to attract landlords who are operating properties with the worst conditions and lowest standards of management. The widespread extent of the issues means that a more comprehensive approach is required.

- Recent progress has been made in forging a positive working relationship with good landlords through the continued strengthening of the Fylde Coast Landlords Forum; since the Council has worked in partnership with the Forum it has seen a steady increase in membership. We are also working to introduce a new PRS Planning and Networking Group consisting of landlords and letting agents who want to work with the Council to improve standards across the PRS.

Although our multi agency approach to problems in the area has had many successes, these in themselves are not enough and new approaches are needed to significantly reduce the issues in the different communities making up the Central area that have so blighted the area for residents and business owners.

Despite a number of initiatives and actions which have taken place in the area, progress has been slow and the area has continued to decline. Property values have continued to be low compared with other areas and deprivation levels have continued to be high. The area has many absentee landlords and high levels of privately rented accommodation which is often poorly managed and in a poor condition, including high numbers of empty properties.

The area experiences high levels of worklessness, poor health, high levels of crime and anti-social behaviour, as well as physical and social deprivation. It is not surprising therefore that the area is perceived to be rundown and contributing negatively to the overall reputation of Blackpool.

Research shows that housing conditions play an important part in the health and wellbeing of its residents and statistics are symptomatic of the effect of housing that is poorly managed and in poor condition. Further information is also given below on anti-social behaviour, criminality and housing conditions, which further evidences factors related to the poor management and condition of properties in the Central area.

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An HMO Additional licensing scheme was introduced to the Central area from 4th July 2016 to address the highest priority management issues – those in HMOs. However the initial low level of applications from landlords and experience from compliance inspections suggests that fewer properties than anticipated will be subject to HMO additional licensing in the area. It is clear that this scheme alone will not tackle the density of issues within the Central area of Blackpool. As well as the evidence presented in the consultation proposal and updated in Section 10 below, comprehensive inspections within the area suggest that issues of poor management are prevalent across the privately rented stock and not confined to HMOs. The most effective approach to tackling these issues is by the introduction of selective licensing alongside the existing HMO additional licensing scheme.

This is an overview of the strengths and weaknesses of alternative solutions:

Alternative Solutions	Weaknesses	Strengths
Management and training support to private landlords	Requires landlord voluntary engagement. Could remove responsibility away from landlords. Source of funding unclear. No enforcement powers available.	Improves standards where landlord is engaged with authority and promotes confidence amongst their tenants.
Introduction of private sector leasing scheme	Resource intensive. Does not improve management standards of landlords who choose not to join the scheme. Reactive rather than proactive.	Contributes to homelessness prevention as could be used for allocation to those in need of housing.
Targeted use of Special Interim Management Orders and Empty Dwelling Management Orders	Resource intensive. Does not present a long term solution to poor management of private rented properties (up to maximum of 5 years – then returned to original owner). Does not tackle poor management techniques. Reactive. Intervention of last resort.	Removes rogue landlord responsibilities and gives to responsible, nominated agent. Improves standards for tenants and local community.

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7. Consultation on the proposal

Consultation on the proposal for selective licensing in the Central area ran from 28th March 2018 - 8th June 2018. Interested parties were contacted through:

- Blackpool Council's website
- The Fylde Coast Landlords Forum
- Local press release
- 12,500 letters and surveys sent out to landlords, residents and business owners in the proposed area and the wider consultation area
- Hard copies of the proposal and survey made available at Council buildings
- Smart Survey link to on-line survey
- A dedicated telephone line and email address was also set up and each enquiry regarding the proposal responded to individually.
- Responses to consultation were received through:
 - 1340 returned survey responses and free text comments
 - 80+ telephone calls from landlords
 - Discussion/comments at Landlord Planning and Networking Group meetings
 - Discussion/comments at Fylde Coast Landlord Forums
- Written responses from landlord representative organisations – NLA and RLA

A summary of the consultation responses and the Council's responses to the issues raised through consultation is published separately alongside this final proposal document. This consultation is sufficient to inform the final selective licensing proposal because the nature of the proposal and reasons for it were sufficiently set out and clear for all to understand and remain fundamentally unchanged.

We have spent time considering a new approach to selective licensing. We researched other licensing schemes and spoken to other Councils across the country.

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7.1 Summary of Consultation Responses

A full report detailing consultation responses can be found as an Appendix to this proposal.

In summary:

- On a scale of 1 to 5 (1 being the lowest and 5 being the highest) of how much respondents rated different issues as a problem for them in their area. 45.5% gave the highest rating for use of/dealing drugs; 44.2% for neglected/run down properties; 33.7% scored 5 for general street scene; 28.7% for nuisance neighbours and 20.3% gave the highest rating for loud noise
- In terms of how safe respondents felt in their local area, only 14.6% of respondents reported that they felt 'very safe' in this area, with 18.84% reporting that they felt 'very unsafe'
- 51% of respondents reported that they were aware of people wanting to move out of the area as a result of problems outlined in the questionnaire. 32.97% stated they did not, and 16.33% had no opinion
- When asked if respondents had ever had problems with any other privately rented properties in the area, 55.8% had experienced problems with loud noise, 57.6% with nuisance neighbours, 58.2% with lack of community engagement, 62.7% with drug dealing/use of drugs, 63% reported problems with the general street scene, 63.7% with neglected/run down properties, and 79.2% with rubbish dumping
- 3.61% of respondents to this question said that they thought all landlords were good, responsible landlords. 28.84% thought most landlords were good and responsible, with 56.22% stating that only a few were good and responsible, and 11.57% said no landlords were good and responsible
- 95.90% of respondents felt that private rented sector landlords should be held responsible for making sure that their properties are in good condition and well maintained, with 1.78% reporting no they should not be held responsible, and 2.40% having no opinion
- When asked what they were mostly concerned about in their homes, 47.16% of respondents reported security as a concern, followed closely by damp and mould at 41.31%. 30.12% felt waste and storage was a concern, 27.37% energy efficiency, and 23.41% efficient heating system, with 26.85% concerned about their property being in a poor state of repair. 18.07% of respondents were concerned about fire safety, 9.29% too little space/too many people, and 7.92% not enough amenities
- 89.06% of respondents to this question felt that all private rented sector landlords should ask for references from prospective tenants, with 3.70% answering no, and 7.47% having no opinion

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- 88.82% of respondents stated that private rented sector landlords should be responsible for dealing with their nuisance tenants and anti-social behaviour caused by their tenants, with 6.95% stating no, and 4.61% having no opinion
- 13.17% of respondents felt that private landlords were effective in dealing with anti-social behaviour, with 69.34% stating that private landlords are not effective in dealing with anti-social behaviour. 17.56% had no opinion
- 75.19% of respondents wanted to see the introduction of selective licensing of private rented properties in this area, with 10.89% stating no they did not want to see selective licensing, and 14.07% having no opinion.

Some of the concerns raised by landlords and some residents were around the need for selective licensing when they felt the Council already has sufficient authority to respond to issues arising from privately rented properties. The Council responded by saying that although the Housing Act 2004, Part 1 does give Local Housing Authorities powers to deal with property conditions and disrepair categorised under the Housing Health and Safety Rating System (HHSRS), these powers alone are not sufficient in dealing with other issues arising from privately rented properties within the proposed area. Licensing will give additional enforcement powers by requiring all landlords to sign up to management conditions that help ensure that they adopt a responsible approach to management of their properties. These management conditions go beyond the normal statutory requirements under the HHSRS, for example, by requiring landlords to undertake tenant referencing and to act responsibly if anti-social behaviour complaints are raised against their tenants.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

8. Blackpool Council's new approach to Selective Licensing

As part of Blackpool Council's wider approach to tackling the issues within the private rented sector in inner Blackpool, we have been working with landlords to improve the relationship between the landlord community and the Council, and further to understand what good landlords major concerns are and how we can address these and work more proactively with those landlords that do provide a good standard of accommodation to their tenants.

We are proposing to introduce a Blackpool Standard which good landlords should have no hesitation in aspiring to meet. This Standard represents the benchmark a tenant should expect to access across Blackpool's private rented sector. Although a landlord will not be forced to meet the Standard, any landlord that does, will receive a significant discount off their licensing fee and support from Blackpool Council in promoting them as a good landlord.

8.1 The Blackpool Standard

Creating a Blackpool Standard will facilitate strong partnership links between Blackpool Council and good landlords. The Blackpool Standard is essentially a Code of Practice that landlords can choose to align themselves to, which sets a standard above current minimum legal requirements through the Housing, Health and Safety Ratings System (HHSRS).

Blackpool Council recognises that many landlords provide accommodation far above and beyond the minimum standards required by law. We feel that it is important to recognise these landlords and reward the good practice that we see across the town, whilst allowing us to focus on tackling those who choose not to meet even the most minimum standards enforceable under current law.

8.2 Aims of the Blackpool Standard

The aims of the Blackpool Standard are to:

- ❖ Improve standards of accommodation offered across Blackpool
- ❖ Promote good standards of management and best practice in the private rented sector
- ❖ Provide quality assurances to tenants over the standard of property they can expect to rent
- ❖ Enable better relationships between the Council and good landlords
- ❖ Establish better relationships between landlords and their tenant

Proposal to designate a selective licensing scheme in Central Area, Blackpool

The names of those landlords and letting agents who meet the Blackpool Standard will be published on Blackpool Council's website and given the Blackpool Standard kite mark to use on their marketing material and letterheads.

Benefits of meeting the Blackpool Standard for landlords and letting agents are:

- ❖ A significant reduction in the licensing fee in recognition of the standard of accommodation offered
- ❖ Opportunities for landlords to access training, support and good practice
- ❖ Offer a market advantage over those who do not meet the standard
- ❖ The opportunity to attract a good tenant who is more likely to want a longer-term tenancy and willing to abide by the terms of the tenancy agreement
- ❖ Recognition as a good, reputable and trustworthy landlord, and endorsement from the Council

8.3 Details of the Standard

Details of the Blackpool Standard will be worked up with landlords and tenants before the scheme is launched. It is proposed that it will consist of a robust framework of measures that a landlord or letting agent must prove they have put in place in order to achieve the standard. This will include setting out the landlord's responsibilities pre-tenancy, during tenancy and post tenancy. There will also be a property condition checklist which must be completed and passed.

This standard will be higher than the HHSRS risk assessment tool and will ensure that the property is being rented out in a condition which ensures that the occupants are safe, warm, and free from damp and mould growth, with secure and lockable doors and windows. The extensive property checklist will run alongside a management standard that the licensee is expected to adhere to.

Monitoring the scheme and managing risks

Appendix 4 sets out potential risks of introducing a Selective Licensing scheme into the Central area and mitigating measures.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

A robust and comprehensive evaluation framework has been introduced to ensure that we are able to provide information at any point through the scheme to show the effectiveness of it, and the difference it is making to the area.

9. The Proposal

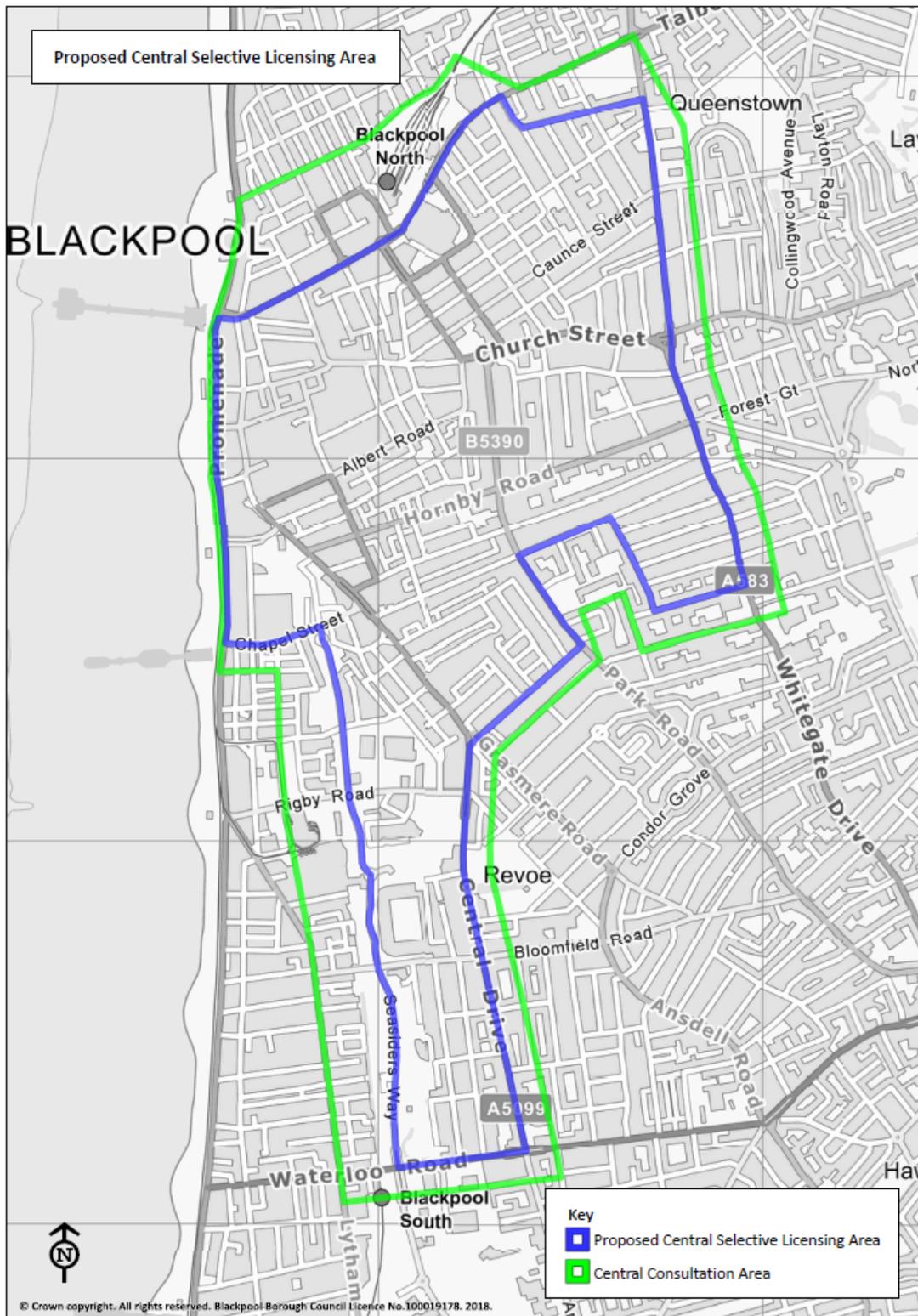
It is proposed that Blackpool Council designates the area outlined in blue on Map 1 as a selective licensing scheme, with the boundary in green being the wider consultation area.

Every privately rented flat, house or room (unless already licensed as a HMO under the existing mandatory scheme, additional licensing scheme or classed as a business let such as tied accommodation) will require a licence to operate in the area and landlords will be responsible for making an application to the Council for a Selective Licence.

Initially it is expected that compliant landlords will apply for the relevant licence shortly after the designation, however it will be necessary to introduce a comprehensive inspection programme to capture unlicensed properties. As with South Beach and Claremont licensing schemes, enforcement will be carried out on a phased approach in order to effectively coordinate and address identified problems.

Map 1: The proposed selective licensing area (see appendix 1 for full list of streets)

Proposal to designate a selective licensing scheme in Central Area, Blackpool



Proposal to designate a selective licensing scheme in Central Area, Blackpool

THE PROPOSED LICENSING AREA IS DEFINED BY THE BLUE BOUNDARY WITH THE WIDER CONSULTATION AREA SHOWN BY THE GREEN BOUNDARY

To meet the costs involved in running these schemes it is proposed to charge fees for Selective Licensing of: -

Licence Fees – Landlords who meet The Blackpool Standard	
Each property occupied by one household	£542 (30% discount)
Multiple occupancy up to 2 units	£763 (30% discount)
Cost per additional unit over 2 units	£47 (30% discount)
Change of ownership to an existing licence	£140 (no discount to be applied)

Licence Fees	
Each property occupied by one household	£775
Multiple occupancy up to 2 units	£1090
Cost per additional unit over 2 units	£68
Change of ownership to an existing licence	£140

Early Bird Discount (available to all applicants whether applying for the Blackpool Standard or not)	
Applications made during the first three months of the scheme for each property	£100

If the designation is approved the scheme will come into effect no sooner than 3 months later to allow confirmation by the Secretary of State and for details of the scheme to be publicised within the designated area and amongst all interested parties.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

By making the designation, all privately rented accommodation in the designated area not fitting into the definition of an Additional HMO or Mandatory Licensable HMO will require a licence. Owners of rented properties will be required to make an application to the Council for a selective licence and will need to nominate either the Manager or the Owner to be the Licence holder.

Landlords will require a licence for any properties they rent out within the designated area. The licence is valid for up to 5 years and will contain a series of conditions that the licence holder will be required to comply with. These conditions will include items relating to the management of the property, fire safety and anti-social behaviour. There will also be a requirement that landlords provide references for tenants that move on from their properties.

The Housing Enforcement Team will be responsible for ensuring compliance with the designation. Where a breach of licence conditions is identified the licence holder may be prosecuted. Failing to apply for a licence could lead to prosecution and a fine of up to £20,000. Alternatively the new civil penalties powers will also be considered, leading to a penalty of up to £30,000.

During the course of the designation the Housing Enforcement Team will be carrying out a programme of pro-active inspections and will take a firm approach where un-licensed properties or breaches of conditions are found, meaning that landlords in these circumstances are likely to be prosecuted. These enforcement activities will not be met from the revenue from fees.

10. Evidencing the need for a Selective Licensing Scheme in the Central area of Blackpool³

Selective licensing is being introduced on the grounds of:

- ASB
- Poor Property Conditions
- Deprivation
- Crime

³ Since the initial consultation (August 2015), more recent statistics have been made available which have been used in this proposal.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

11.1 Anti-social behaviour

The Selective Licensing Guidance stipulates that Councils must demonstrate that to use the criterion of a significant and persistent problem caused by ASB⁴:

“Some or all of the private sector landlords who have let premises in the area are failing to take action to combat such problems that it would be appropriate for them to take.

‘A landlord has responsibility to ensure persons he has permitted to reside at a property do not cause an annoyance or nuisance to other persons residing in it, or other persons living, working or visiting the immediate neighbourhood. If anti-social behaviour is being carried out within the immediate vicinity of the property and is being caused by the occupiers of it, then it would be reasonable to expect a landlord to ensure that those persons are not conducting themselves in a way that is adversely impacting on the local community. This applies equally to visitors of the property’⁵.

This area has many absentee landlords and high levels of privately rented accommodation which is often poorly managed and in a poor condition, including high numbers of empty properties. The Council has recently set up regular multi-agency meetings to address problematic empty homes in this area alongside other interventions.

Referring back to the consultation responses, only 3.61% of respondents believed all landlords in the area to be good and responsible. 89.06% of respondents felt that all landlords operating in the private rented sector should ask for references from prospective tenants.

The majority of respondents had experienced issues with other privately rented properties with the main issues being: rubbish dumping (79.2%); neglected/run down properties (63.7%) and use of/dealing drugs (62.7%). 95.90% of respondents felt that the responsibility lay with landlords to ensure that properties were in a good condition and well maintained.

⁴ *The Selective Licensing of Houses (Additional Conditions) (England) Order 2015*

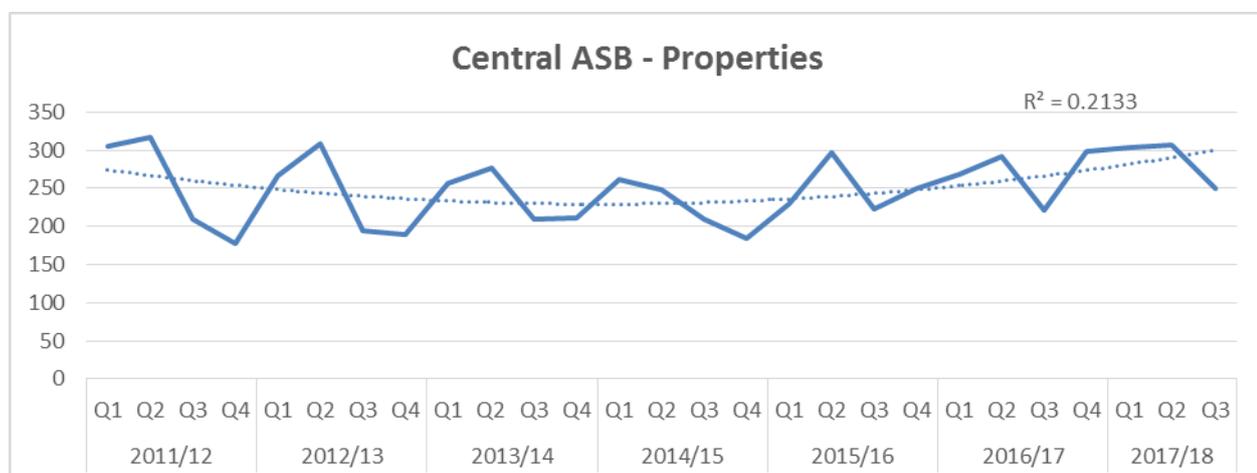
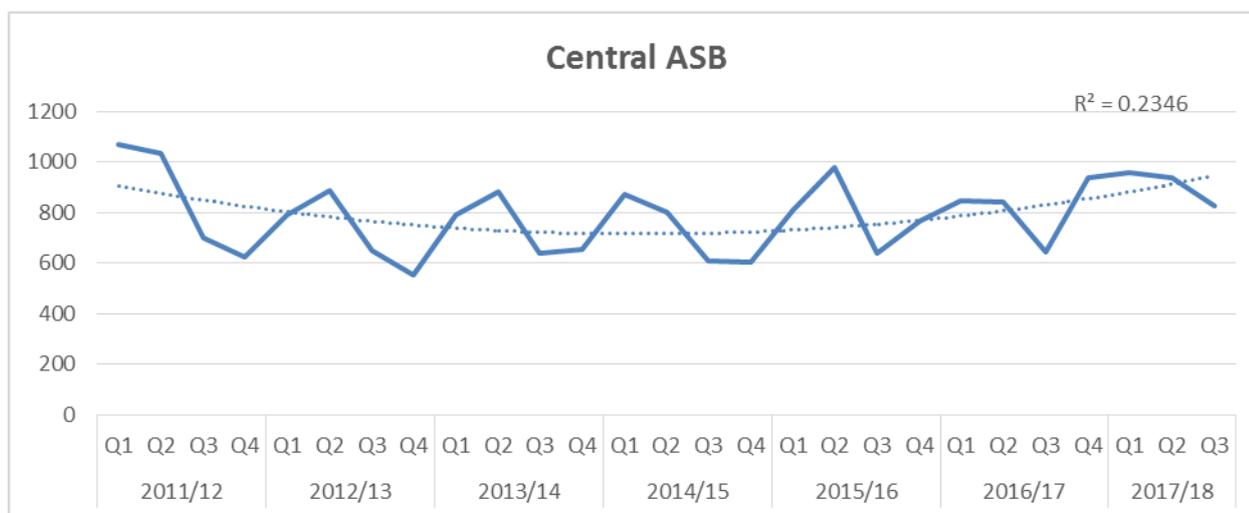
⁵ *(Approval steps for Additional and Selective Licensing designations in England, CLG).*

Proposal to designate a selective licensing scheme in Central Area, Blackpool

88.2% of respondents felt that landlords should be responsible for dealing with nuisance and ASB caused by tenants and their visitors, and 69.34% felt private landlords were not effective in dealing with anti-social behaviour.

The data below evidences that there are high levels of anti-social behaviour within the proposed licensing area with a significant proportion arising from privately rented properties.

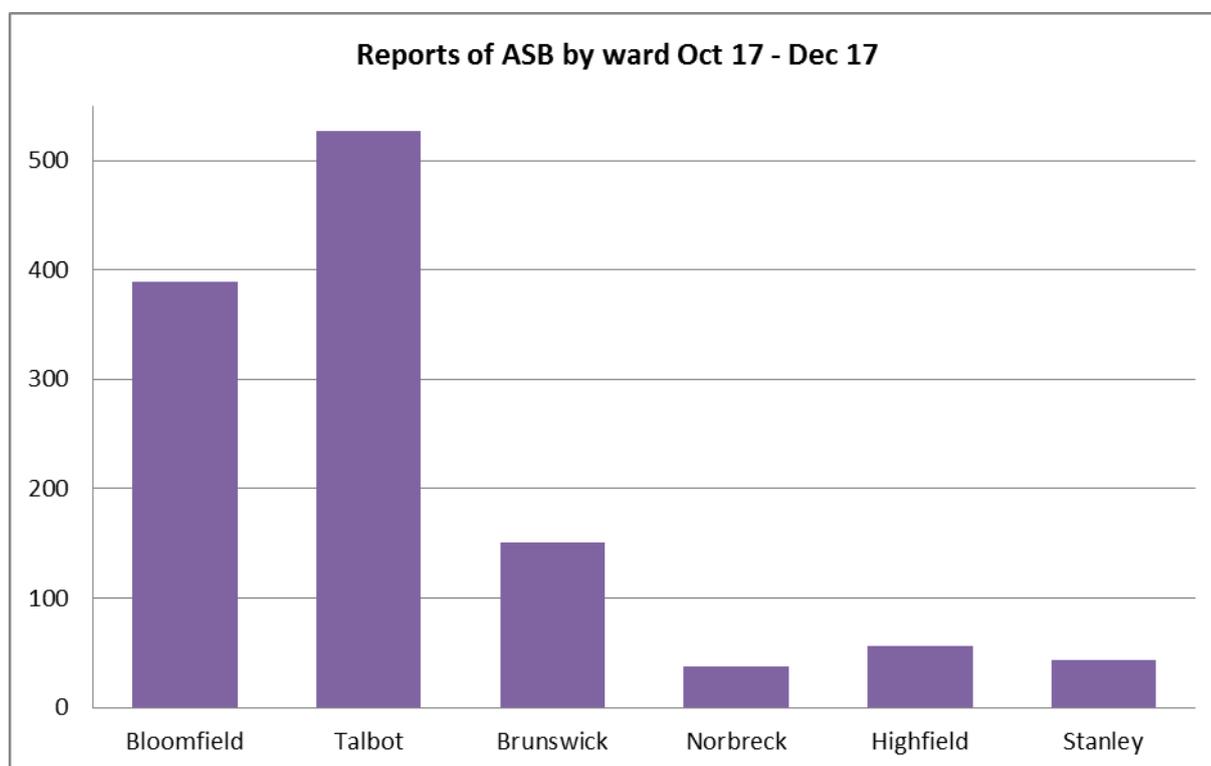
Independent statistical information provided by Lancashire Constabulary shows trends in ASB both across the whole Central area and also where a report of ASB can be directly linked back to a private rented property in that area. The graphs below are provided by Lancashire Constabulary and show a significant proportion of reports of ASB can be linked directly back to the private rented sector.



Proposal to designate a selective licensing scheme in Central Area, Blackpool

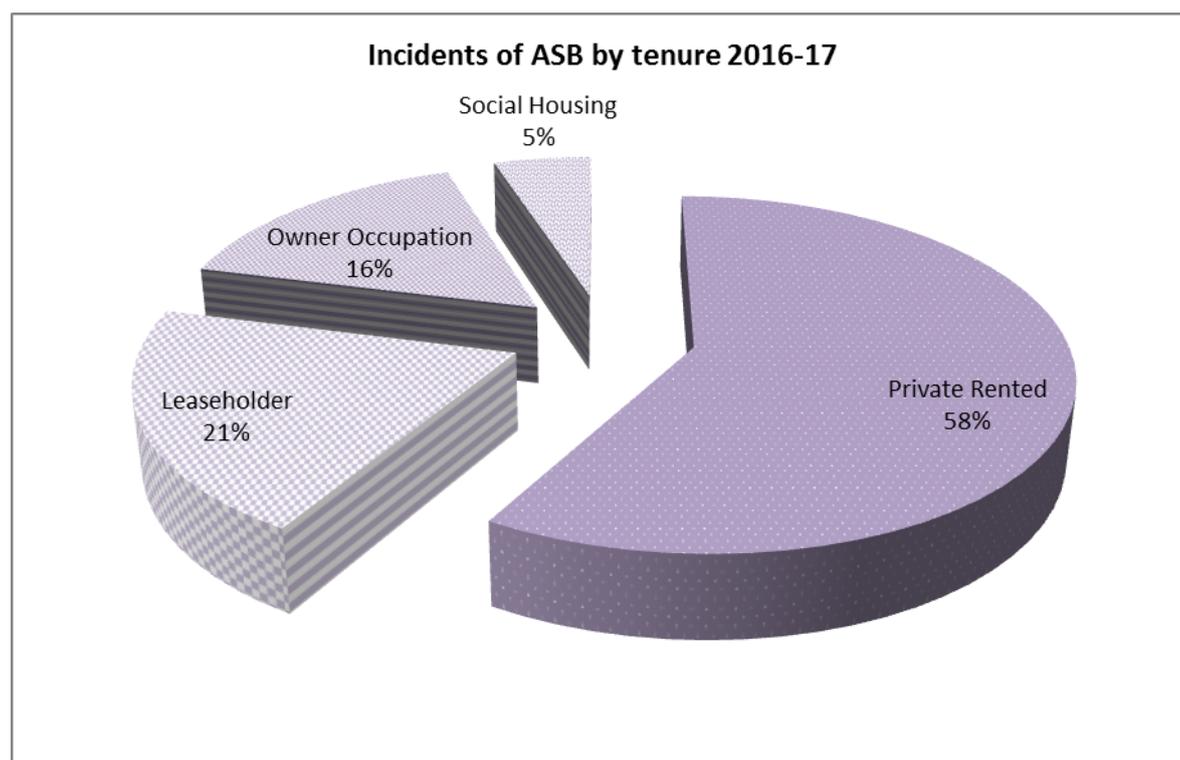
Linking anti-social behaviour back to the Council's wider strategies and initiatives, in order to achieve the objectives set out in the Blackpool Community Safety Plan, selective licensing will enable the Council to work with landlords to develop their own ASB plans and review their procedures for effectively dealing with ASB from their tenants and their visitors. Landlords can work with the Council's Community Safety Team who can provide education; advice and assistance to both landlords to tackle anti-social tenants; and also to tenants who are suffering from anti-social behaviour to develop confidence in dealing with; and reporting of ASB. Landlords will also be able to work with a dedicated ASB Officer funded through the licence fees, who can assist them with anti-social tenants if they need help.

To provide some comparative data to show the difference in levels of anti-social behaviour across Blackpool, the graph below illustrates the number of reports of ASB in the three wards in the Central area compared to other areas of the town:



Using the most recent annual data provided by Lancashire Constabulary to break down reports of ASB by tenure type, the chart below illustrates that 58% of reports were linked back to a property within the private rented sector:

Proposal to designate a selective licensing scheme in Central Area, Blackpool

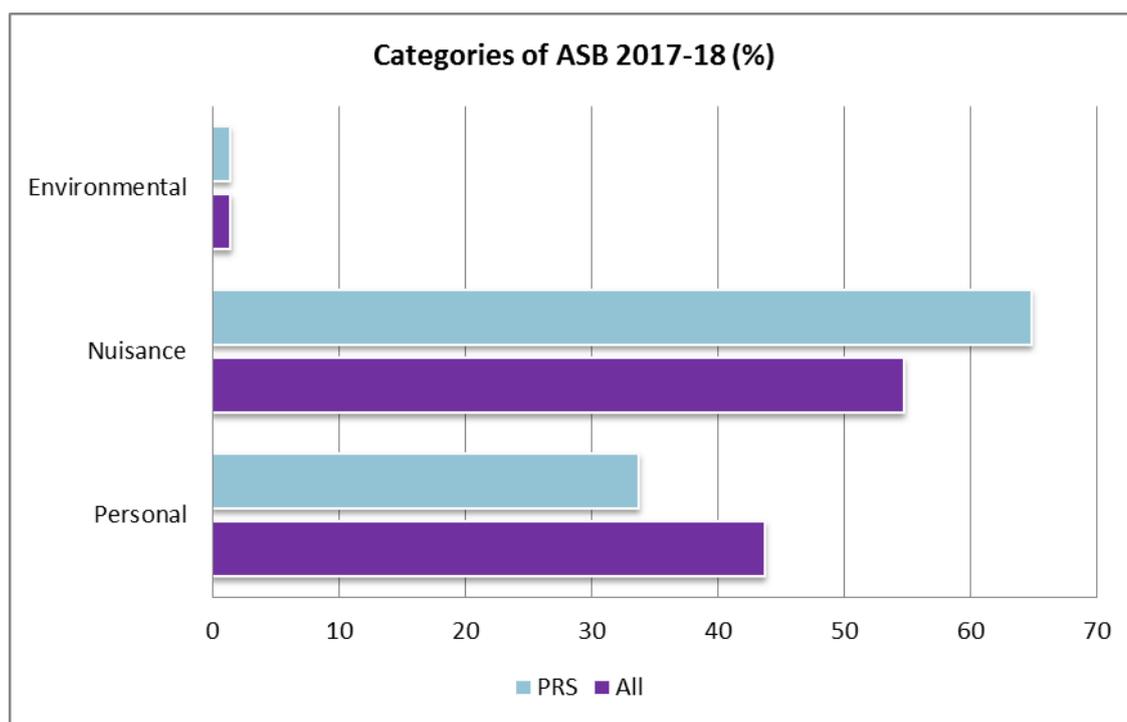


ASB information provided by the Police is broken down into three categories:

- Personal – which is designed to identify ASB incidents that the caller, call-handler or anyone else perceives as either deliberately targeted at an individual or group rather than the community as a whole. It includes incidents that cause concern or stress all the way through to incidents which have a serious adverse impact on people’s quality of life.
- Nuisance – captures those incidents that cause suffering to an area rather than an individual person. It includes incidents where behaviour interferes with public interests such as health, safety and quality of life.
- Environmental – this category deals with the interface between people and place. It includes incidents where individuals and groups have had an impact on their surroundings including natural, built and social environments.

The chart below illustrates the percentage of complaints that fell into each category for both calls relating to the private rented sector properties within the Central area, and then the Central area as a whole. The higher level of ‘nuisance’ calls within the private rented sector could be related to alcohol or drug misuse, vandalism and noise nuisance.

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11.2 Crime

The Selective Licensing Guidance stipulates that Councils must demonstrate that to use the criterion of high levels of crime:

(a) That the area suffers from high levels of crime;

(b) That the criminal activity affects those living in the properties referred to in article 3(1) (a), or other households and businesses in the area; and

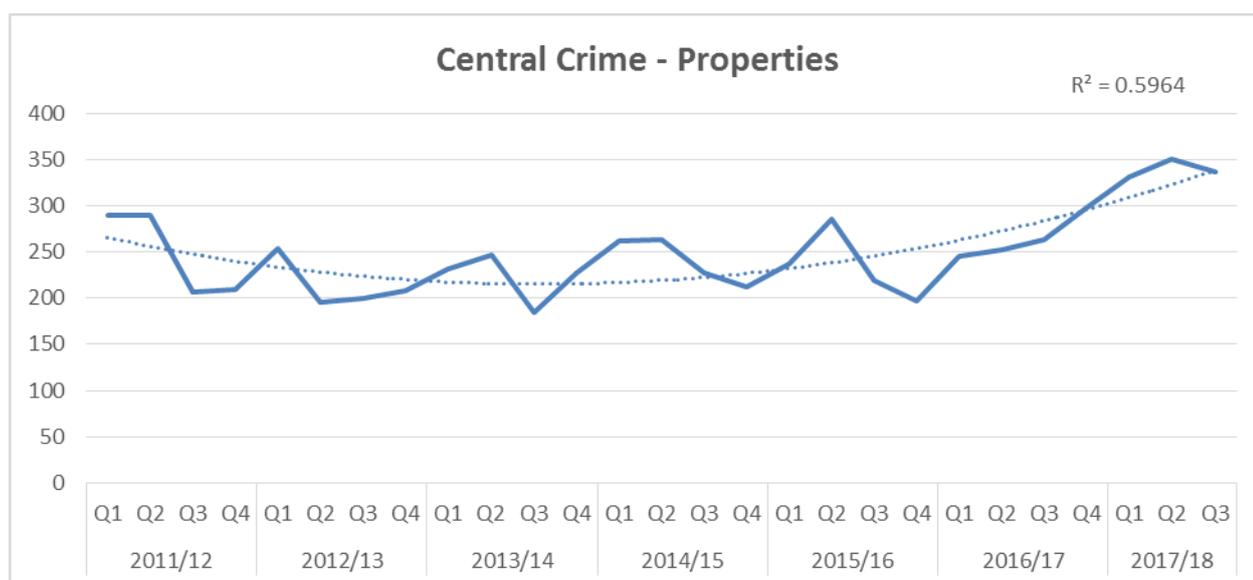
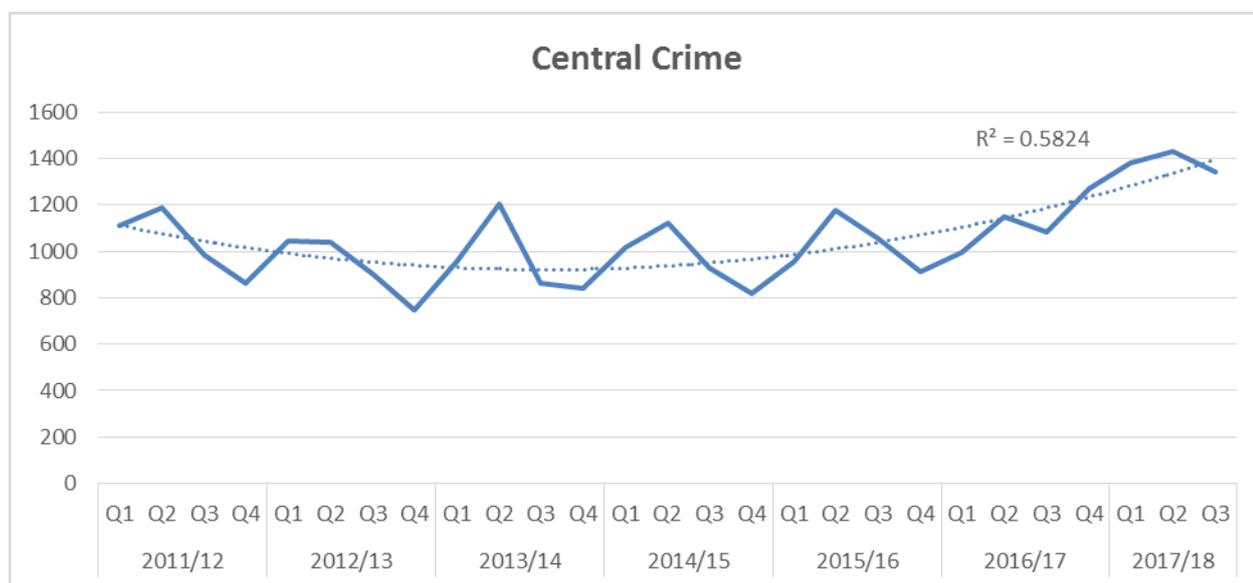
That making a designation will, when combined with other measures taken in the area by the local housing authority, other persons together with the local housing authority or by the police, contribute to a reduction in the levels of crime in the area, for the benefit of those living in the area.

Referring back to the consultation responses residents were asked to rate on a scale of 1-5 on how safe they felt in their own home and around their neighbourhood, with 1 being very safe and 5 being very unsafe. 18.84% of residents felt very unsafe; with only 14.60% feeling very safe.

The Central area of Blackpool has especially high levels of recorded crime.

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The graph below demonstrates the crime trends in the Central area over the past five years both across the whole area and then those which can be directly linked back to privately rented properties within the area.



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Lancashire Police have provided information of a number of Operations that have been necessary to implement in direct response to the high levels of ASB and crime in the Central area:

Operation Castle

This was a summer 2016 ASB operation on Talbot Ward and Town Centre, aimed at tackling low level youth ASB, street drinking and street begging. This was necessary due to complaints from residents and businesses in this area regarding young people causing harassment, alarm and distress to people visiting the area. The new **Operation Clean Up** has now been stepped up to include tackling 'Spice' users; the combination of these issues is continuing to cause residents to feel unsafe in the area in which they live.

Operation Warrior

During 2016-17 this operation focused on overt targeting of street dealing on Talbot, Claremont and Brunswick Wards, where drug dealing is a prominent issue for local people.

Operation Azure

This operation is focused on Blackpool's overall management of sex workers. The Central area houses the majority of sex workers, and this covers the 'on' street workers on the Palatine Road, Central Drive area, and the 'off' street workers that include the management of the parlours around Cookson Street and King Street.

Operation Forager

This is a divisional wide operation using statistical analysis of burglary dwelling patterns, allowing officers to identify where offences have taken place and based on statistical mapping, predict where another burglary is likely to take place. Much of their work under this operation covers the Central Blackpool area.

We are also current joint working with Blackpool Transport to tackle serious bus and taxi damage across the Central area. Youths living in the area have been throwing rocks at buses and taxi and 'bus-surfing' causing a danger to themselves and others.

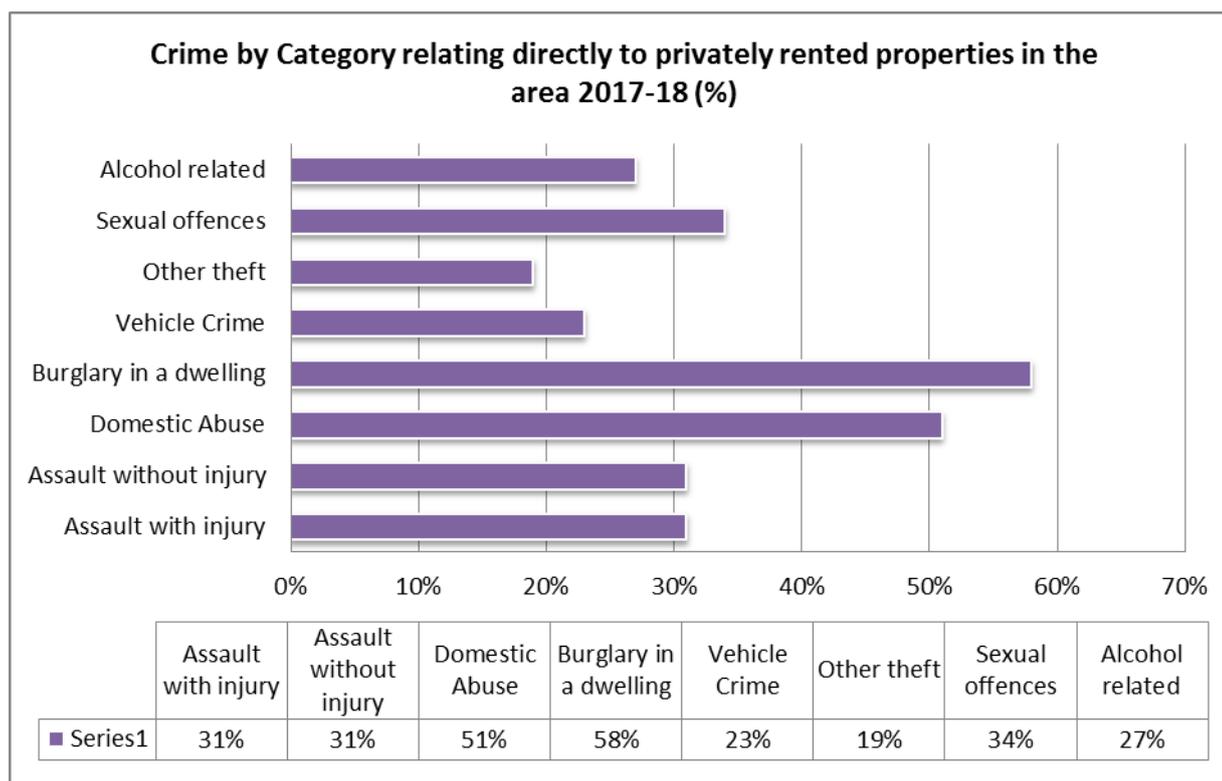
One of our largest and most serious problems at this current time relates to the cultivation of cannabis farms within residential property within the private rented sector. We have currently carried out a series of raids seizing thousands of cannabis farms and are using heat seeking cameras to continue this work. We are finding these farms are being run by serious organised crime groups who are using illegal immigrants who have been trafficked into the UK.

Linking crime back to the Council's wider strategies and initiatives, in order to achieve the objectives set out in the Blackpool Local Plan Core Strategy, a robust and clear message must be sent out to landlords and tenants, and people living within the private rented sector in the Central area should be able to feel

Proposal to designate a selective licensing scheme in Central Area, Blackpool

that they live in a safe and secure environment, which promotes a local pride and sense of place. The Core Strategy identifies the need to address the challenges associated with quality housing and the development of sustainable and safer neighbourhoods.

The chart below illustrates, from the calls received to Lancashire Constabulary in 2017-18, shows the percentage of those calls, by category, that can be linked directly back to privately rented properties in the Central area. 51% of domestic abuse calls were linked back to privately rented properties in this area, 34% of sexual offences, and 31% of assaults, both with or without injury. 58% of burglaries in a dwelling can be linked back to privately rented properties and 23% of vehicle crime.



Blackpool consists of 21 wards in total. In the year 2017-18 the three wards of Bloomfield, Talbot and Brunswick made up 35% of all ASB in Blackpool and 36% of all crime in Blackpool. According to the Blackpool Joint Strategic Needs Assessment these same three wards make up only 14% of the Blackpool population.

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11.3 Deprivation

The Selective Licensing Guidance stipulates that Councils must demonstrate that to use the criterion of deprivation:

(a) That the area is suffering from a high level of deprivation, which affects a significant number of the occupiers of properties referred to in article 3(1) (a); and

(b) That making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, contribute to a reduction in the level of deprivation in the area.

And in determining whether an area is suffering from a high level of deprivation, the local housing authority may have regard to the following factors in relation to the area:

(a) The employment status of adults;

(b) The average income of households;

(c) The health of households.

The English Indices of Multiple Deprivation is a UK government study of deprived areas in English local councils. It provides a set of relative measures of deprivation for small areas (Lower-layer Super Output Areas - LSOAs) across England based on seven different domains of deprivation:

- Income Deprivation
- Employment Deprivation
- Education, Skills and Training Deprivation
- Health Deprivation and Disability
- Crime
- Barriers to Housing and Services
- The Living Environment

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The 2015 index ranks Blackpool as the most deprived of 326 Local Authority areas in England, based on both the average LSOA score and concentration of deprivation indicators; 36 of 94 Blackpool LSOAs are in the 10% most deprived in the country.

Within the proposed selective licensing area there are 9 LSOA's, three within Bloomfield, two for Brunswick and four for Talbot ward (mapped to the closest boundary line). All LSOA's within the proposed licensing area are deemed to be within the 5% most deprived in England.⁶

The overall Index of Multiple Deprivation

The overall Index of Multiple Deprivation is a measure based on combining the seven specific dimensions of deprivation. The overall ranking for LSOAs within the proposed selective licensing area shows that deprivation has deteriorated from 2010 apart from Bloomfield 013C where the ranking improved by 1 place (out of 38,000). 7 LSOA areas out of 9 are within 1% of the most deprived places in the country with the remaining 2 falling within in the most 5% deprived.

Employment Deprivation Domain

The Employment Deprivation Domain measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.

The indicators

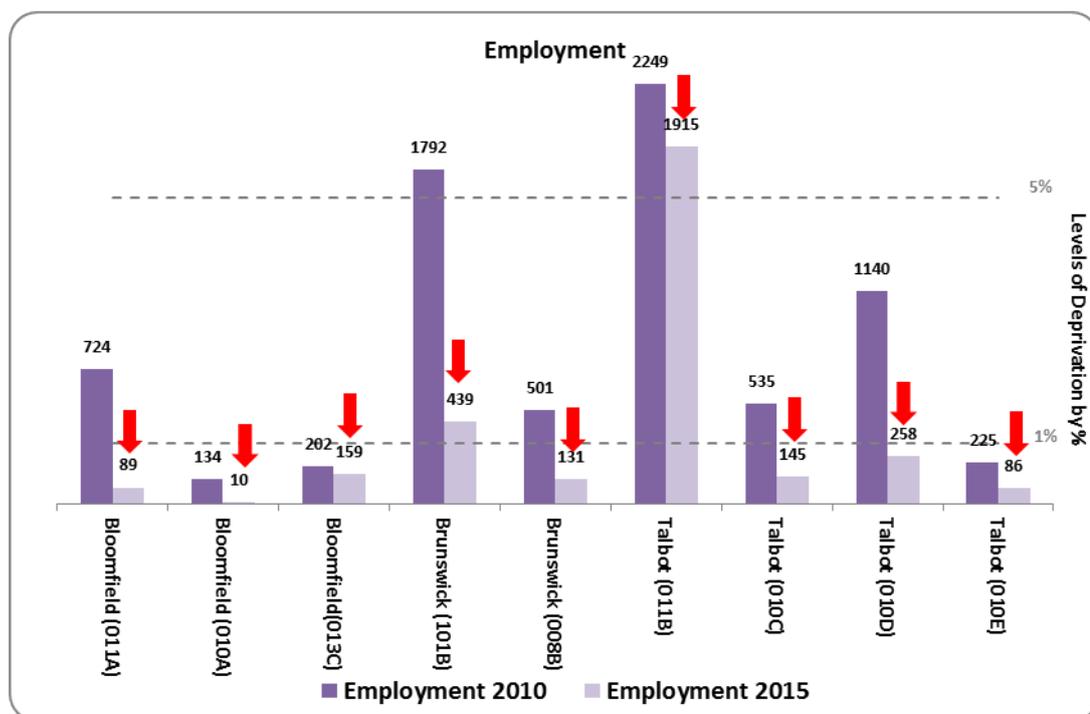
- Claimants of Jobseeker's Allowance (both contribution-based and income-based), women aged 18 to 59 and men aged 18 to 64
- Claimants of Employment and Support Allowance (both contribution-based and income-based) , women aged 18 to 59 and men aged 18 to 64
- Claimants of Incapacity Benefit, women aged 18 to 59 and men aged 18 to 64
- Claimants of Severe Disablement Allowance, women aged 18 to 59 and men aged 18 to 64

⁶ In the initial consultation proposal for selective and additional licensing (July 2015) IMD 2010 was used, however more recent data has since been released.

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- Claimants of Carer’s Allowance, women aged 18 to 59 and men aged 18 to 64. ⁷

All LSOAs within the proposed designated area have seen a decline in ranking since 2015, meaning more intense deprivation. Apart from Talbot (101B) all other areas fall within the 1% most deprived in the country for employment.



Education, Skills and Training Deprivation Domain

The Education, Skills and Training Domain measure the lack of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and the other relating to adult skills. These two sub-domains are designed to reflect the ‘flow’ and ‘stock’ of educational disadvantage within an area respectively. The ‘children and young people’ sub-domain measures the attainment of qualifications and associated measures (‘flow’), while the ‘skills’ sub-domain measures the lack of qualifications in the resident working-age adult population (‘stock’). The two sub-domains are then standardised by ranking and transforming to an exponential distribution and combined with equal weights to create the overall domain score.

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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The indicators

Children and Young People sub-domain

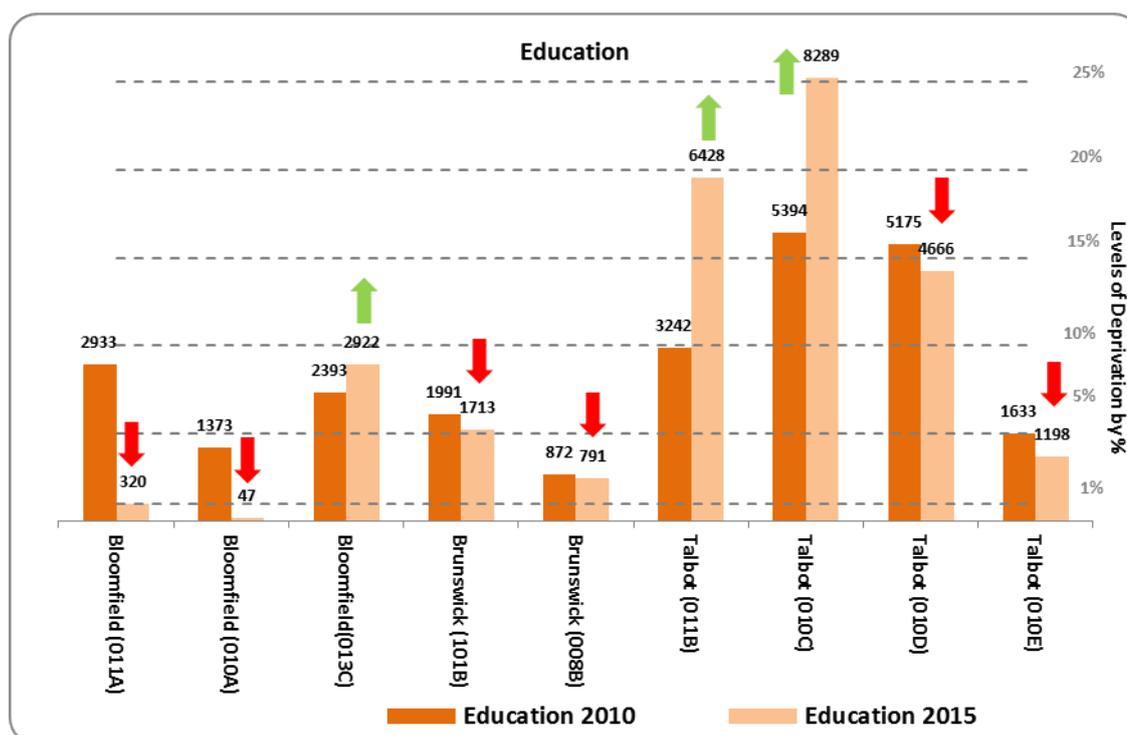
- Key Stage 2 attainment: The average points score of pupils taking reading, writing and mathematics Key Stage 2 exams
- Key Stage 4 attainment: The average capped points score of pupils taking Key Stage 4
- Secondary school absence: The proportion of authorised and unauthorised absences from secondary school
- Staying on in education post 16: The proportion of young people not staying on in school or non-advanced education above age 16
- Entry to higher education: A measure of young people aged under 21 not entering higher education

Adult Skills sub-domain

- Adult skills: The proportion of working-age adults with no or low qualifications, women aged 25 to 59 and men aged 25 to 64
- English language proficiency: The proportion of working-age adults who cannot speak English or cannot speak English well, women aged 25 to 59 and men aged 25 to 64 ⁸

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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Six LSOAs have seen a decline in ranking for education. Whilst some LSOA's have seen an improvement in ranking, all wards falls within the 25% of the most deprived areas within the Country for Education.

Income Deprivation Domain

The Income Deprivation Domain measures the proportion of the population in an area experiencing deprivation relating to low income. The definition of low income used includes both those people that are out-of-work, and those that are in work but who have low earnings (and who satisfy the respective means tests). ^[1]

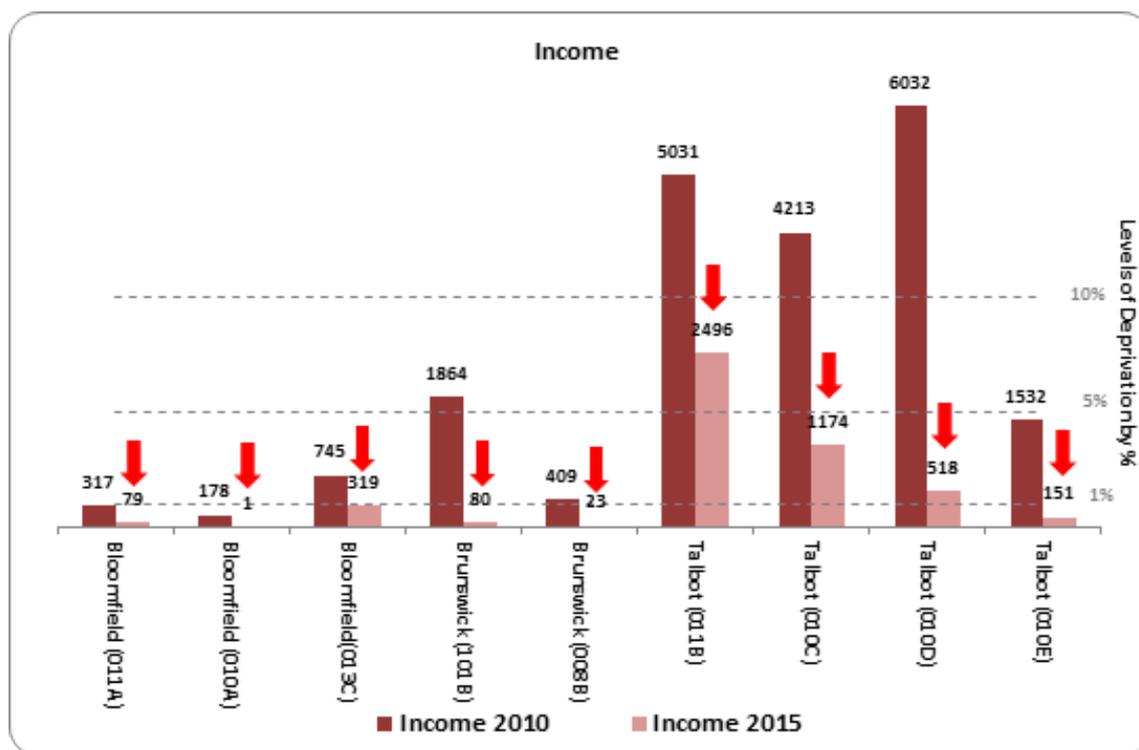
The indicators

- Adults and children in Income Support families
- Adults and children in income-based Jobseeker's Allowance families

^[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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- Adults and children in income-based Employment and Support Allowance families
- Adults and children in Pension Credit (Guarantee) families
- Adults and children in Working Tax Credit and Child Tax Credit families not already counted, that is those who are not in receipt of Income Support, income-based Jobseeker’s Allowance, income-based Employment and Support Allowance or Pension Credit (Guarantee) and whose equivalised income (excluding housing benefit) is below 60 per cent of the median before housing costs
- Asylum seekers in England in receipt of subsistence support, accommodation support, or both



There has been a significant decline in Income since 2010, particularly in Talbot. 6 wards fall within the 1% of the most deprived wards within the county.

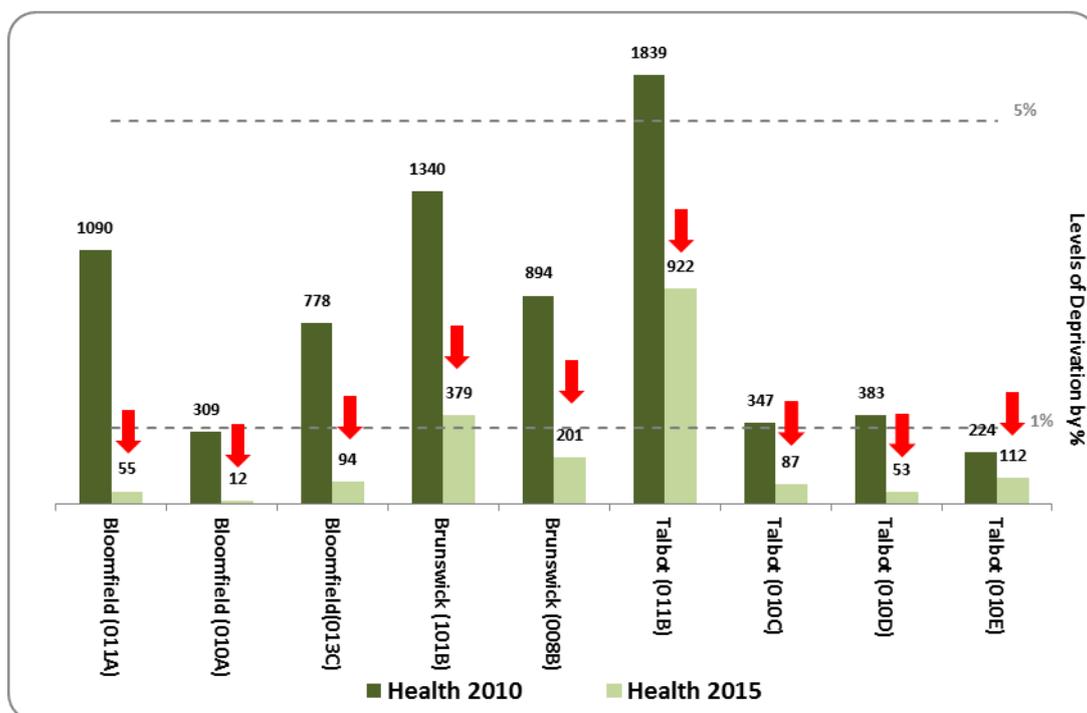
Health Deprivation and Disability Domain

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The Health Deprivation and Disability Domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The domain measures morbidity, disability and premature mortality but not aspects of behaviour or environment that may be predictive of future health deprivation.

The indicators

- Years of potential life lost: An age and sex standardised measure of premature death
- Comparative illness and disability ratio: An age and sex standardised morbidity/disability ratio
- Acute morbidity: An age and sex standardised rate of emergency admission to hospital
- Mood and anxiety disorders: A composite based on the rate of adults suffering from mood and anxiety disorders, hospital episodes data, suicide mortality data and health benefits data.⁹



⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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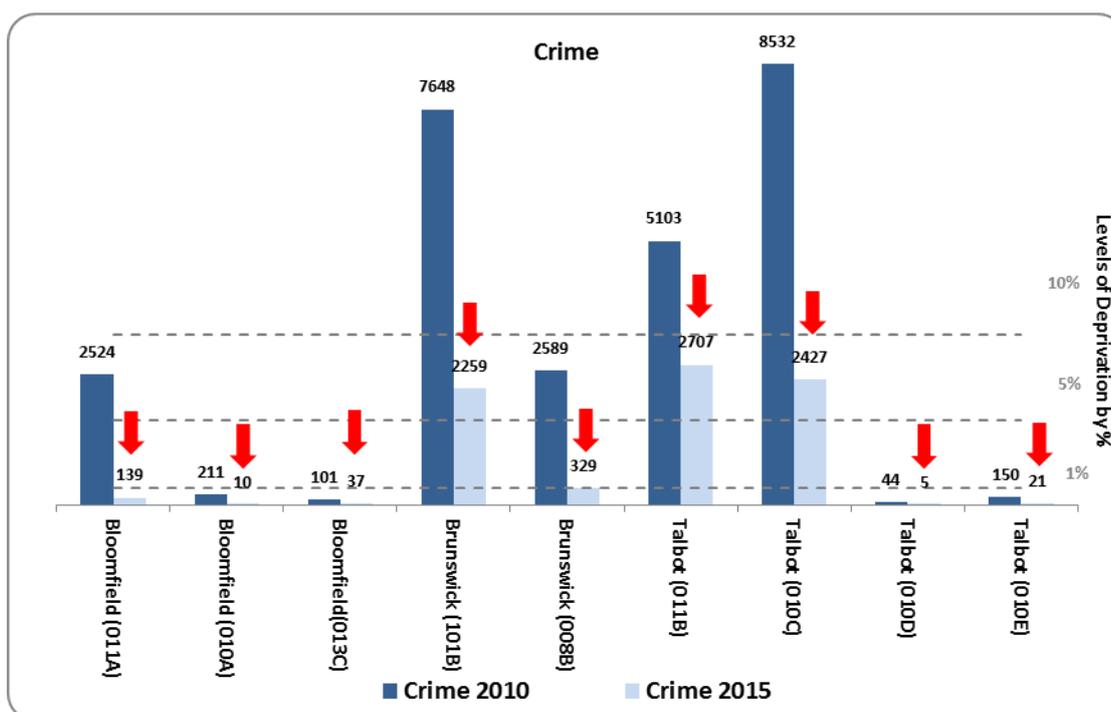
The IMD 2015 for health deprivation shows that within the proposed licensing area residents' health has deteriorated relative to other areas, particularly in parts of Bloomfield, Brunswick and Talbot. All wards fall within 5% of the most deprived in the Country with some areas falling within 1% of the unhealthiest LSOA's.

Crime Deprivation Domain

Crime is an important feature of deprivation that has major effects on individuals and communities. The Crime Domain measures the risk of personal and material victimisation at local level.

The indicators

- Violence: The rate of violence per 1,000 at-risk population
- Burglary: The rate of burglary per 1,000 at-risk properties
- Theft: The rate of theft per 1,000 at-risk population



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Criminal Damage: The rate of criminal damage per 1,000 at-risk populations. ¹⁰

The measures applied by DCLG to rank this domain demonstrates that crime has increased within the proposed licensing areas, relative to other areas, with some parts seeing a significant decline in ranking. All areas within the proposed selective licensing scheme fall within the 10% of most deprived places in the country for crime.

Barriers to Housing and Services Domain

The Barriers to Housing and Services Domain measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability.

The indicators

Geographical Barriers sub-domain

Road distance to a post office: A measure of the mean distance to the closest post office for people living in the Lower-layer Super Output Area

Road distance to a primary school: A measure of the mean distance to the closest primary school for people living in the Lower-layer Super Output Area

Road distance to a general store or supermarket: A measure of the mean distance to the closest supermarket or general store for people living in the Lower-layer Super Output Area

Road distance to a GP surgery: A measure of the mean distance to the closest GP surgery for people living in the Lower-layer Super Output Area

Wider Barriers sub-domain

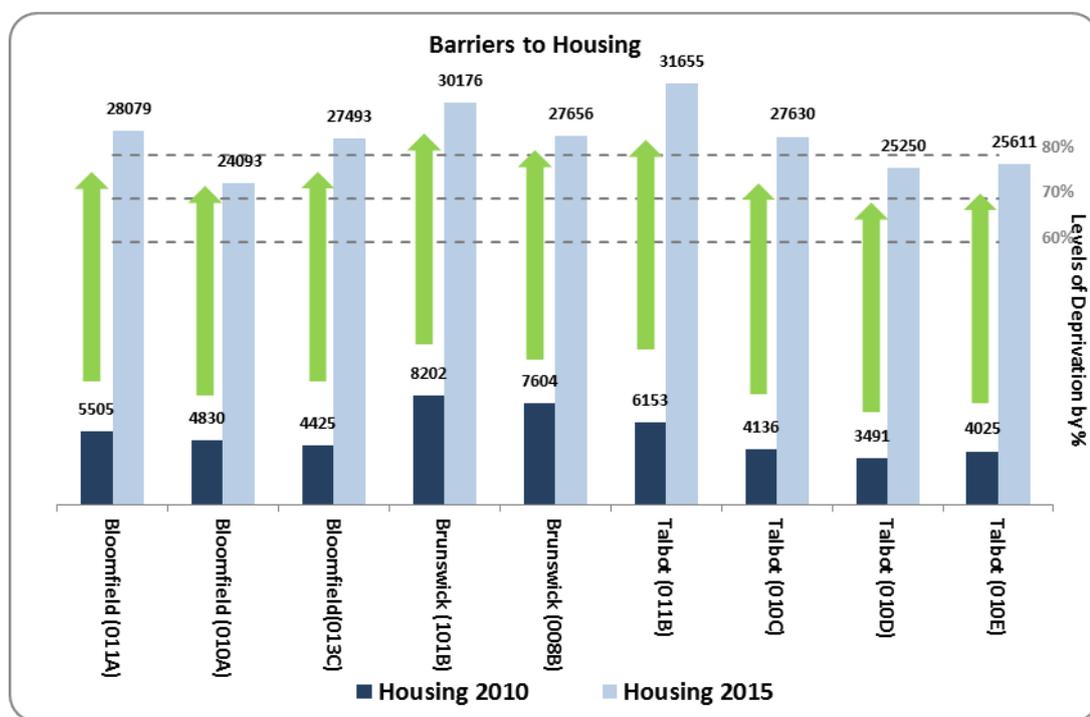
Household overcrowding: The proportion of all households in a Lower-layer Super Output Area which are judged to have insufficient space to meet the household's needs

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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Homelessness: Local authority district level rate of acceptances for housing assistance under the homelessness provisions of the 1996 Housing Act, assigned to the constituent Lower-layer Super Output Areas

Housing affordability: Difficulty of access to owner-occupation or the private rental market, expressed as the inability to afford to enter owner-occupation or the private rental market. ¹¹



Since 2010 there has been a significant improvement in ranking for 'Barriers to Housing and Services' domain. All areas within the proposed licensing scheme scored above 70% demonstrating that this particular domain is considered as the least deprived within the country.

It is important to understand that this domain does not take into account actual property conditions, such as adequate heating and properties being in good decorative conditions. The emphasis is more upon the availability of local amenities and being able to access the private rental market (47% for the proposed area). There are high levels of housing benefit claimants within these areas which is supported by the findings from Employment Domain.

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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Living Environment Deprivation Domain

The Living Environment Deprivation Domain measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents.

The indicators

Indoors sub-domain

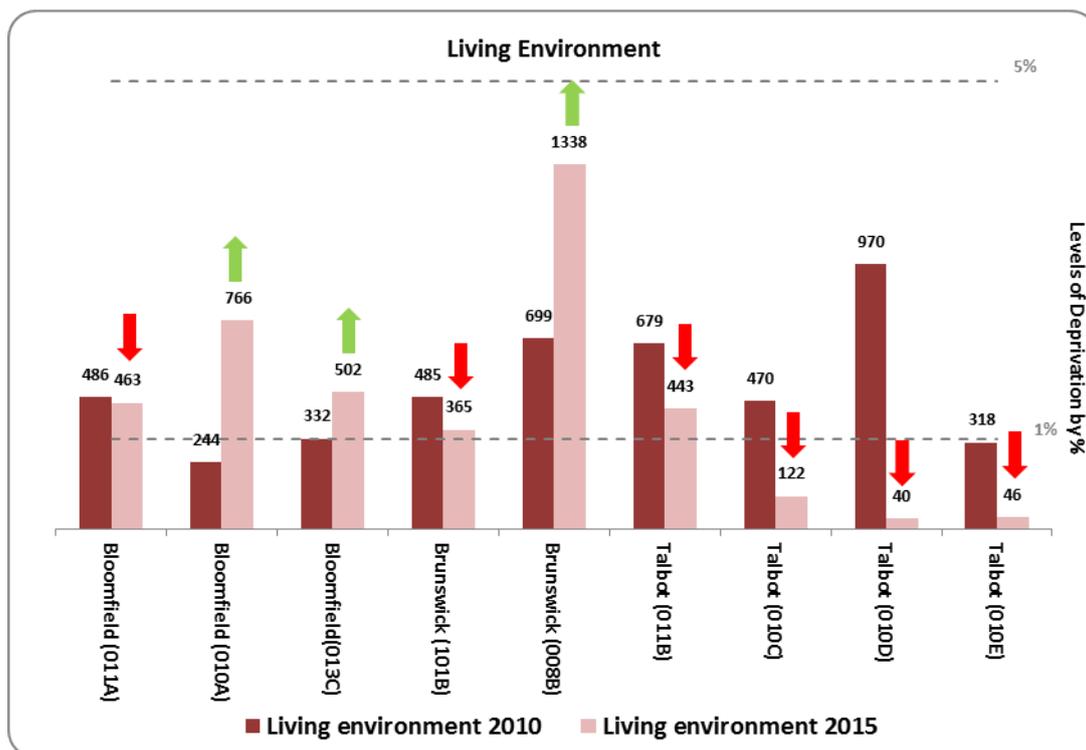
- Houses without central heating: The proportion of houses that do not have central heating or heating which is expensive to run.
- Housing in poor condition: The proportion of social and private homes that fail to meet the Decent Homes standard.

Outdoors sub-domain

- Air quality: A measure of air quality based on emissions rates for four pollutants
- Road traffic accidents involving injury to pedestrians and cyclists.¹²

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/464485/English_Indices_of_Deprivation_2015_-_Technical-Report.pdf

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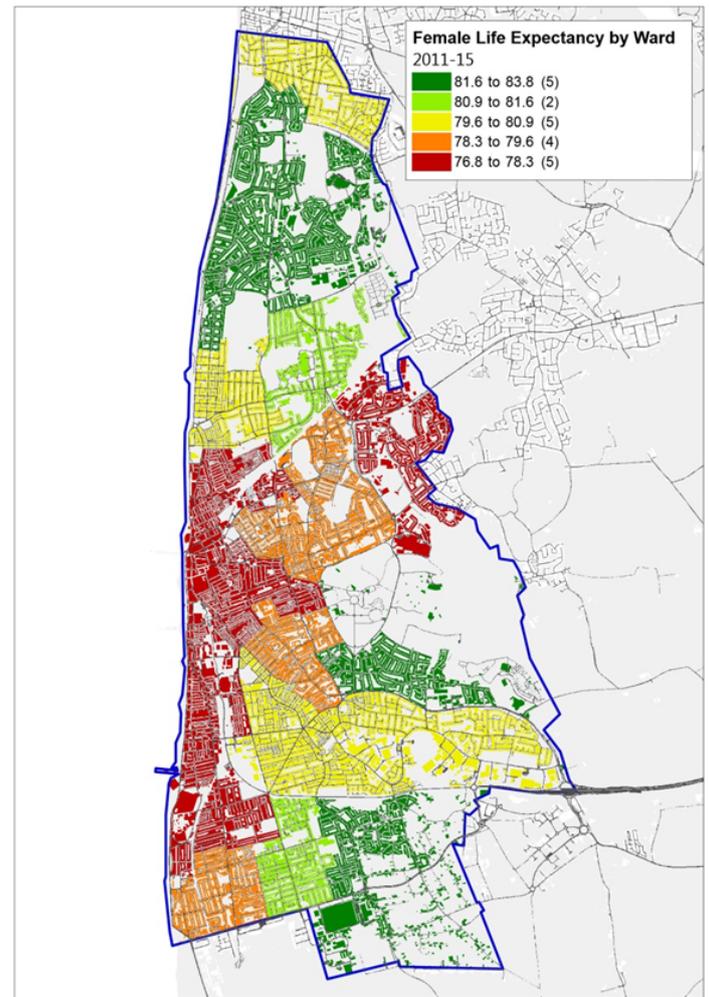
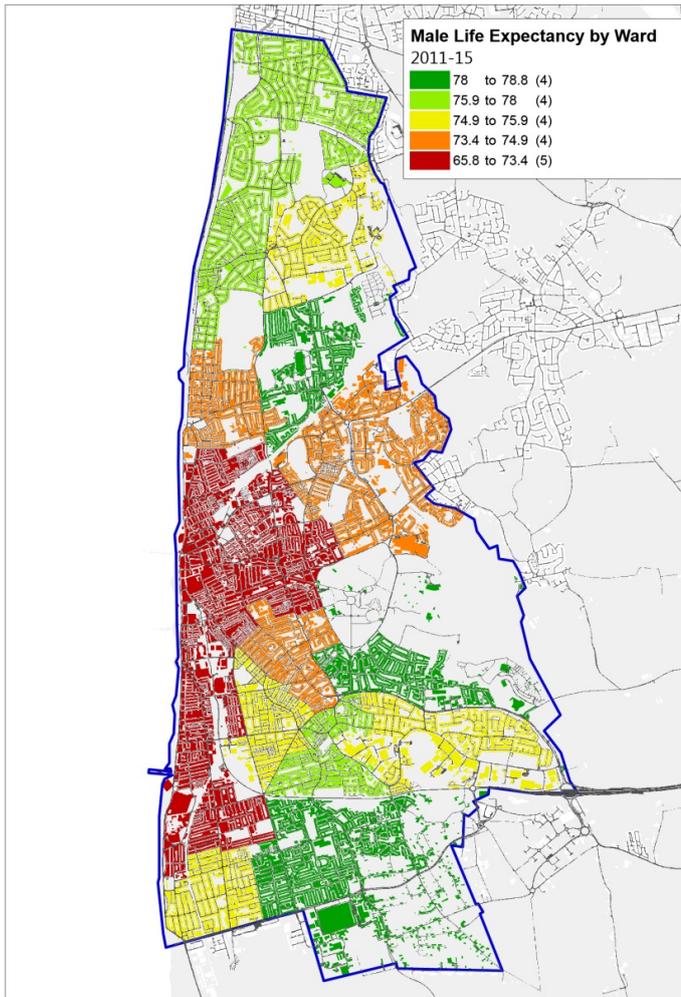


Whilst some areas within the proposed licensing area have seen an improvement in ranking for the domain of Living Environment, most LSOA's have seen a decline. All LSOA's are considered to be within the 5% of the worst areas within the country emphasising the need to improve property conditions.

Licensing is not used as a standalone tool, and we feel it is important to address both the people and the property in order to make a real difference to the levels of deprivation in Blackpool.

One example of the issues within inner Blackpool is illustrated below in the form of life expectancy. For men, there is a 10.3 difference in life expectancy between the ward with the highest male life expectancy and the lowest. For women the difference was 7.3 years.

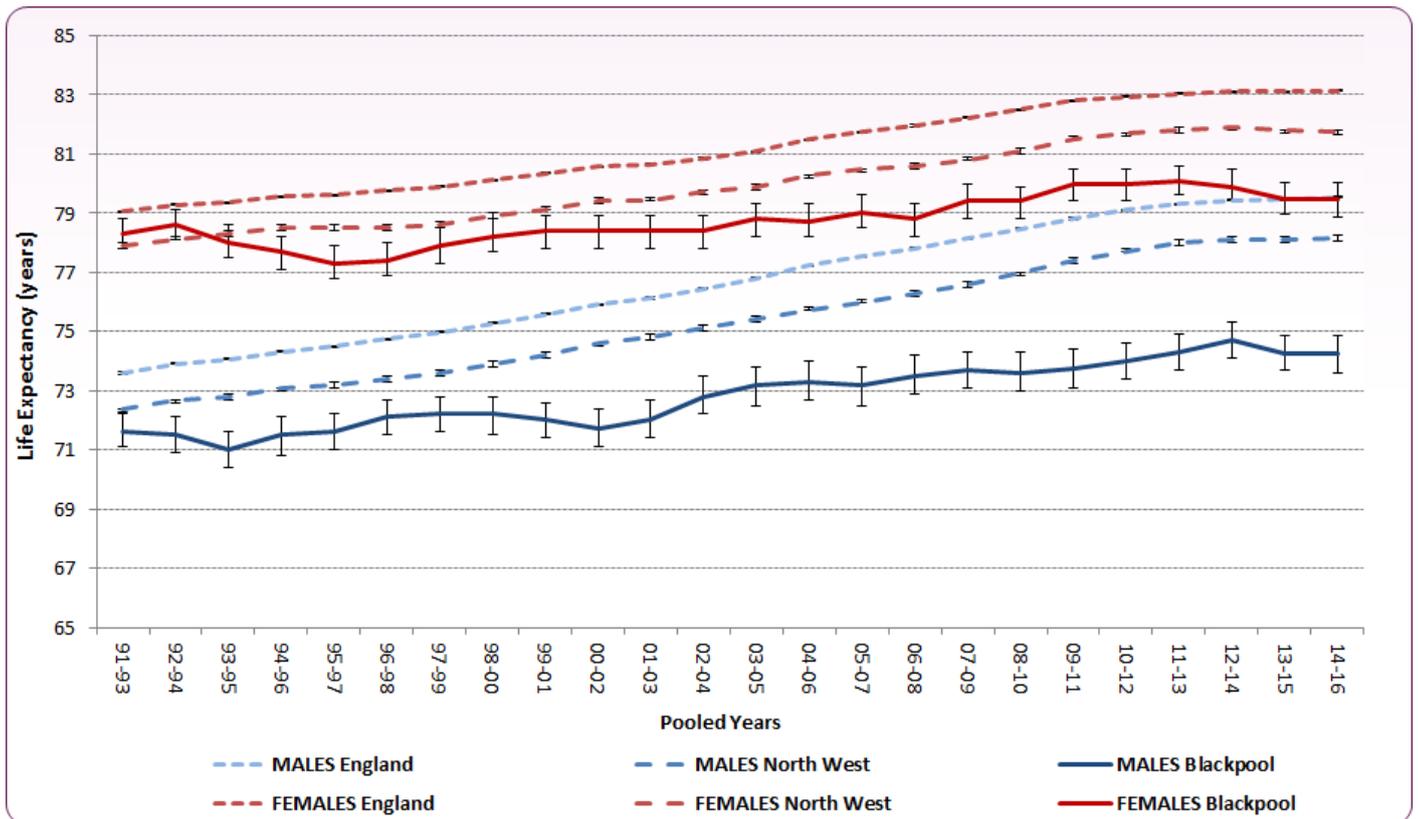
Proposal to designate a selective licensing scheme in Central Area, Blackpool



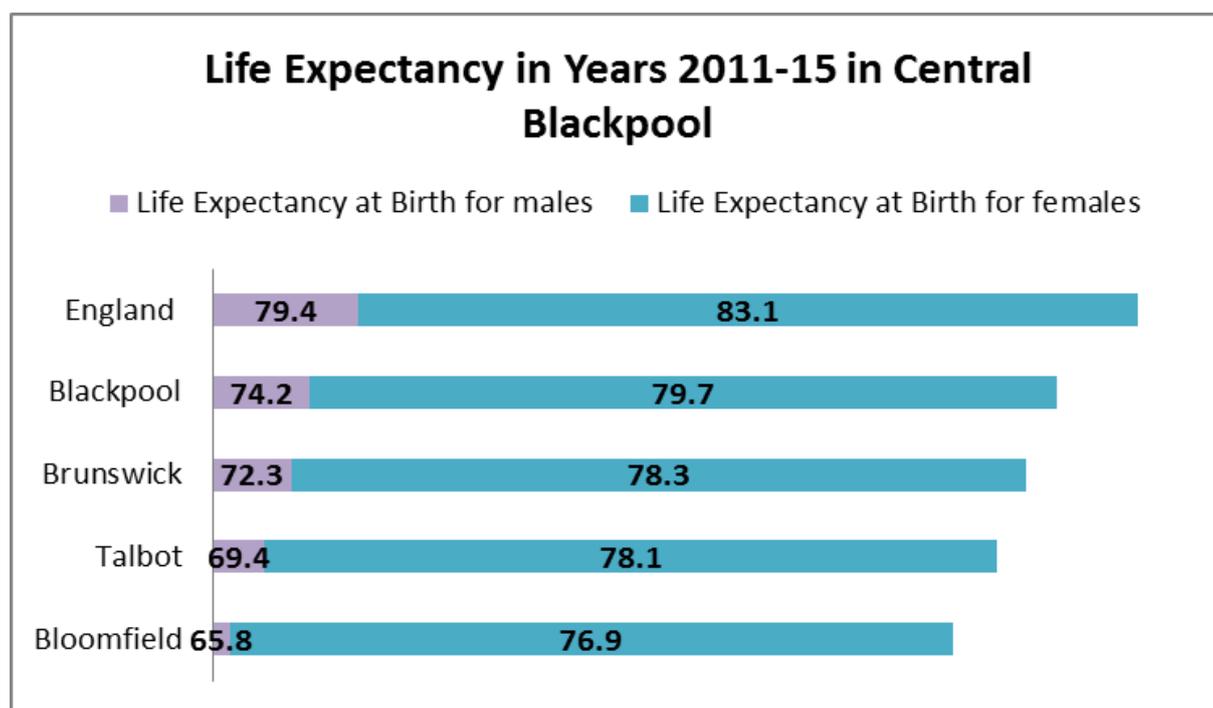
Men in Blackpool have the lowest life expectancy from birth in the whole of England and Wales. Blackpool's life expectancy is 5.3 years below England and 4.0 years below the North West figure. Female life expectancy is 3.6 years below England and Wales and 2.2 years below the North West figure.

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Life Expectancy at Birth (1991-1993 to 2014-16)



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Figures taken from the Blackpool JSNA show the three wards in the Central area have amongst the lowest rates of life expectancy, with a difference of 13 years between the highest and lowest rated wards in Blackpool (men) and 6.9 (women).

11.4 Poor Property Conditions

The Selective Licensing Guidance stipulates that Councils must demonstrate that to use the criterion of poor property conditions:

(a) that having carried out a review of housing conditions under section 3(1) of the 2004 Act, the local housing authority considers it would be appropriate for a significant number of the properties referred to in article 3(1) (a) to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises (1);

(b) that the local housing authority intends to carry out such inspections as referred to in sub-paragraph (a), with a view to carrying out any necessary enforcement action; and .

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(c) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed under section 90 of the 2004 Act, contribute to an improvement in general housing conditions in the area.

The English Housing Survey 2016-17¹³ showed that in 2016, one fifth of dwellings (20% or 4.7 million homes) failed to meet the Decent Homes Standard. The private rented sector had the highest proportion of non-decent homes at 27%.

Figures from the Office of National Statistics show that in the private rented sector there are more non decent properties which are in serious disrepair than in other tenures. Furthermore, there are more properties with high levels of fuel inefficiency and poor quality of environment than any other tenure.

A comprehensive inspection programme began in the area in October 2016 as part of the additional licensing designation, and in the first year alone, **1058** properties have been inspected, **315** schedules of work and **24** notices (we expect this figure to rise) for failure to comply with the improvements required to meet the minimum standard contained within the Housing, Health and Safety Rating System (HHSRS).

This equates to ***just less than 1 in 3 of properties inspected in the first year which have fallen below the basic minimum standard expected for decent habitation.*** The HHSRS rating is extremely low and although meeting this standard makes a landlord compliant, it may actually still fall significantly below the standards expected by the majority of tenants living in the private rented sector.

As part of the additional licensing inspection programme in the Central area, a multi-agency team have been 'sweeping' the area and attempting to get property details for as many properties in the area as possible as part of the Council's area housing condition review.

It is important to note that a high number of these hazards have been found in non-HMO properties which are not covered under the additional licensing scheme but would however fall under the remit of a selective licensing scheme. In the first year of inspections, these figures highlight the need for the introduction of selective licensing in this area:

¹³ MHCLG, English Housing Survey Headline Report 2016-17

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Hazards by Type			
Category 1	HMO	Non-HMO	Total
Hazard 02 Excess Cold	111	109	220
Hazard 12 Entry by Intruders	4	0	4
Hazard 13 Lighting	1	0	1
Hazard 17 Personal Hygiene, Sanitation, Drainage	1	0	1
Hazard 18 Water Supply	1	0	1
Hazard 21 Falling on Stairs etc.	2	1	3
Hazard 22 Falling between Levels	1	0	1
Hazard 23 Electrical Hazards	8	2	10
Hazard 24 Fire	6	2	8
Hazard 29 Structural Collapse and Falling Elements	1	2	3
Category 2			
Hazard 01 Damp and mould growth	134	226	360
Hazard 02 Excess Cold	1	3	4
Hazard 03 Excess Heat	3	13	16
Hazard 06.1 Carbon monoxide	1	1	2
Hazard 06.3 Sulphur dioxide and Smoke	0	4	4
Hazard 09 Uncombusted fuel gas	6	11	17
Hazard 11 Crowding and Space	0	1	1
Hazard 12 Entry by Intruders	24	34	58
Hazard 13 Lighting	2	3	5
Hazard 15 Domestic Hygiene, Pests and Refuse	24	47	71
Hazard 16 Food Safety	57	91	148
Hazard 17 Personal Hygiene, Sanitation, Drainage	48	89	137
Hazard 18 Water Supply	1	0	1
Hazard 19 Falls associated with Baths etc.	1	1	2
Hazard 20 Falling on Level Surfaces etc.	30	50	80
Hazard 21 Falling on Stairs etc.	41	81	122
Hazard 22 Falling between Levels	44	46	90
Hazard 23 Electrical Hazards	59	84	143
Hazard 24 Fire	231	138	369
Hazard 25 Flames, Hot Surfaces etc.	22	31	53
Hazard 26.1 Collision and Entrapment	14	33	47
Hazard 26.2 Collision Hazards Low Architectural	0	4	4

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Hazard 28 Position and Operability of Amenities	14	12	26
Hazard 29 Structural Collapse and Falling Elements	17	29	46
TOTAL HAZARDS IDENTIFIED	910	1148	2058

The above information gives a very clear and compelling picture and confirms that poor property conditions within inner Blackpool are not restricted to houses of multiple occupation, but highlights the wider issues across the area which would be addressed by selective licensing. We would be able to get behind the front doors of the most vulnerable residents within the town. Blackpool Council are committed to carrying out inspections in these properties with a view to carrying out any necessary enforcement action, but also working with landlords to provide advice and assistance in bringing their properties up to standard. We have recently offered subsidised financial support to landlords through the Central Heating Fund and also through other ECO funding and government grants to improve energy efficiency in the private rented sector, however we have received a disappointingly low take up of these measures from landlords. Selective licensing would enable us to identify poor property conditions and management, and work directly with landlords to improve conditions across the sector. There is also a real need to undertake this role to ensure the safety and security of tenants, who in a high proportion of cases will be some of the most vulnerable in the town.

NHS Blackpool research in 2010 found that Bloomfield, Talbot, and Brunswick had a significantly higher number of Job Seekers Allowance (JSA) claimants than the Blackpool average, as well as significantly more claiming Invalidity Benefit (IVB), Severe Disablement Allowance (SDA) and Disability Living Allowance (DLA). They also had a significantly worse level of emergency hospital admissions and levels of mortality. When asked about their levels of health and disabilities, local residents gave answers that were again significantly worse than the Blackpool average in all three ward areas.

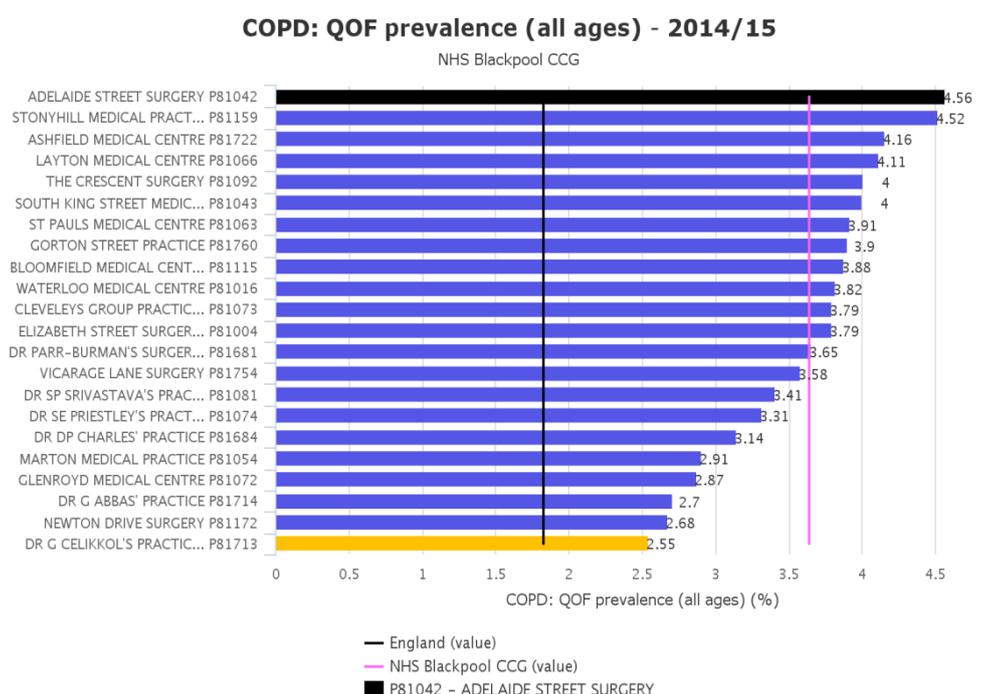
The Impacts of poor housing on health

Poor housing conditions have a detrimental impact on health, costing the NHS at least £600 million per year. Research based on the various sources of housing and health data suggests that poor housing is associated with increased risk of cardiovascular diseases, respiratory diseases and depression and anxiety.¹⁴ Adelaide Street Surgery is located in the heart of the Talbot ward within the proposed licensing area. It looks after the health needs of approximately 10,786 residents in the locality and has

¹⁴ http://www.parliament.uk/documents/post/postpn_371-housing_health_h.pdf

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recorded the highest rate of respiratory disease and in particular COPD (Chronic Obstructive Pulmonary Disease) in all the surgeries located within the Blackpool CCG:



Looking at emergency hospital admissions the admission levels for COPD is significantly higher in Talbot, Brunswick and Bloomfield wards than Blackpool as a whole¹⁵.

According to the Chartered Institute of Environmental Health (CIEH) there is a strong link between mental health problems and insecure, poor quality and overcrowded homes. These environments compound the mental health issues, such as increased noise and the chaotic way of living, especially if overcrowded. Tenants may also find themselves isolated and without support mechanisms. Substandard housing has also been found to impact on socio-emotional development, psychological distress, behavioural problems, and educational outcomes of children and young people. There is a growing base of evidence to indicate that very young children under school age are very susceptible to long term mental health issues, such as anxiety and depression, if they are in substandard housing.

¹⁵ Blackpool JSNA

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Some evidence also suggests that there is also a greater impact on women, at home alone, especially if a single parent; and older people who due to disability, lack of simple interventions such as handrails or other support mechanisms find themselves housebound and socially isolated.

Interventions that improve housing conditions have been shown to result in improvements on mental health measures, including reduced anxiety or depression, psychological distress, and improved patient reported health score. Providing a warm home has been clearly shown to benefit both young and old in relation to their feeling of wellbeing as well as reducing the physical risks that can arise from cold homes.

Children are most likely to live in overcrowded housing compared with working age adults and pensioners. There is building evidence that living in a crowded home can have a negative impact on a child's development and educational attainment. Overcrowding may have both direct and indirect effects. The latter are of course less easily measured. For example, children's education may be affected by overcrowding directly, through a lack of space for homework, as well as indirectly because of school absences caused by illness, which may be related to overcrowding.

Qualitative research, with small numbers of families, has revealed a link between overcrowding and: stress, tension, and sometimes family break-up; anxiety and depression; a lack of privacy, particularly for adolescents and disrupted sleep patterns, which for the young can lead to problems with cognitive development, reading skills and sometimes even the ability to speak with clarity which ultimately will impact on their education and health. The chaotic sleeping arrangements were an underlying cause of many mental health effects.

Excess cold also has an impact with clear evidence linking home temperatures and mental health. The evaluation of the UK Warm Front Scheme, found that increasing the warmth of homes had a clear impact on mental health – those with bedroom temperatures of 21 degrees C were 50% less likely to experience depression and anxiety than those whose bedrooms were only 15 degrees C.

Other housing hazards such as condensation, damp and mould; noise; pests; living in flats; draughts and the age of homes have also been shown to have some connection to mental health.

The cost to the NHS and society of poor housing conditions is already well documented; however current cost estimates often do not include impacts on mental health. This means that it is possible that cost savings would in fact increase due to the reduction in mental illness – which costs England at least £105bn each year. In addition, the social and economic costs associated with mental ill health – in terms

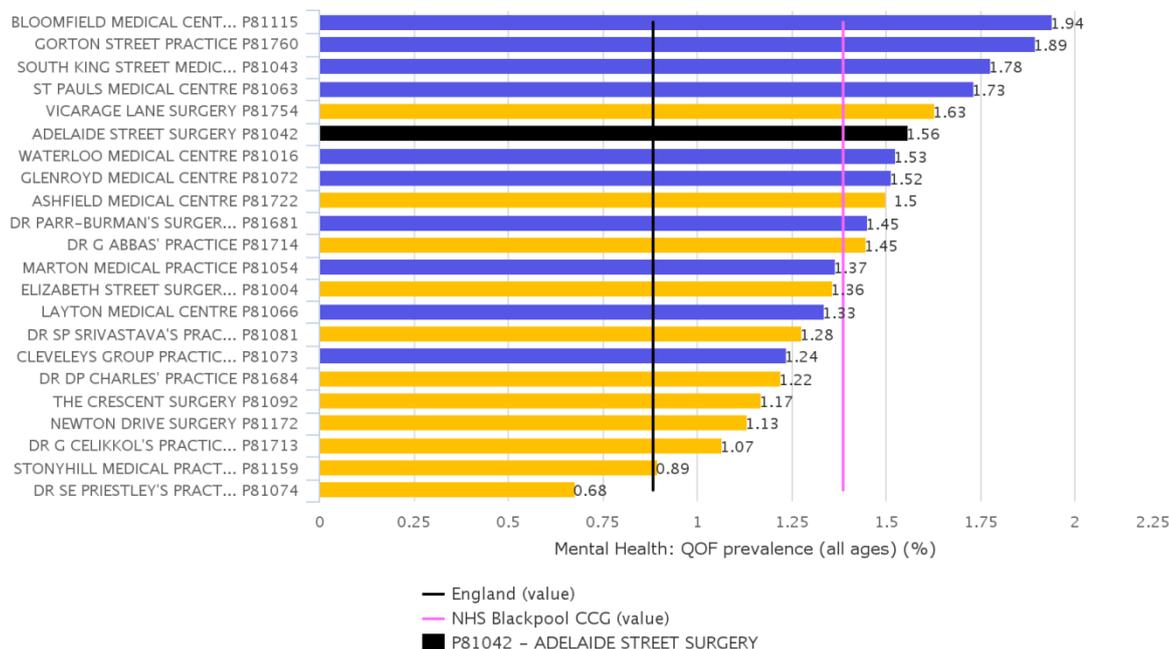
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of personal suffering and family and community impacts as well as costs to employment and benefits payments – would likely decrease.

In terms of those number of patients in the local area being diagnosed with mental health conditions the top three surgeries within the Blackpool CCG boundary are Bloomfield Medical Centre, Gorton Street Practice and South King Street Medical Centre with Adelaide Street Surgery in 6th position. Patients attending these three surgeries are predominantly in areas of high concentration of private rented accommodation and fall within the Central area. These reported levels are significantly higher than the average for England.

Mental Health: QOF prevalence (all ages) - 2014/15

NHS Blackpool CCG



Blackpool Council's Public Health Annual Report 2014 stated that 26% of houses in the most deprived areas are not meeting the Decent Homes Standard compared to 17% in the most affluent areas. The highest proportion of homes that do not meet the Decent Homes Standard are found to be in the private rented sector. This is a significant issue for Blackpool where over a quarter (26.1%) of residents live in privately rented accommodation; a much higher proportion than is seen in the North West (15.4%) or across England (16.8%).

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The high number of improvement notices issued under Part 1 of the Housing Act 2004 by Blackpool Council's Housing Enforcement Team evidences the poor condition of properties within the inner areas.

Fuel poverty refers to a household that cannot afford to heat their home to an adequate standard impacting on their health and wellbeing. The quality of housing, the cost of energy and the household income are all contributing factors in determining whether a household finds itself in fuel poverty. In Blackpool 13.5% of households experience fuel poverty compared to 10.4% of households in England.

Around two thirds of all homes that fail the Decent Homes Standard do so because of the lack of thermal comfort, poor energy efficiency or inadequate heating systems. There are many more vulnerable people living in private homes that fail to meet the Decent Homes Standard in Blackpool than the national average (40.6% as opposed to 23.6% nationally).

Homelessness charity Shelter has highlighted research from a YouGov survey in 2014 showing 10% of 4,544 private renters in England suffered ill health in the past 12 months because their private rented housing was of a poor state.

5% of the respondents also said that their family had been threatened with eviction because they told their landlord they would complain to the local council. 2% said they were actually evicted, or served a notice, because they had asked a landlord to carry out repairs and maintenance on their home.

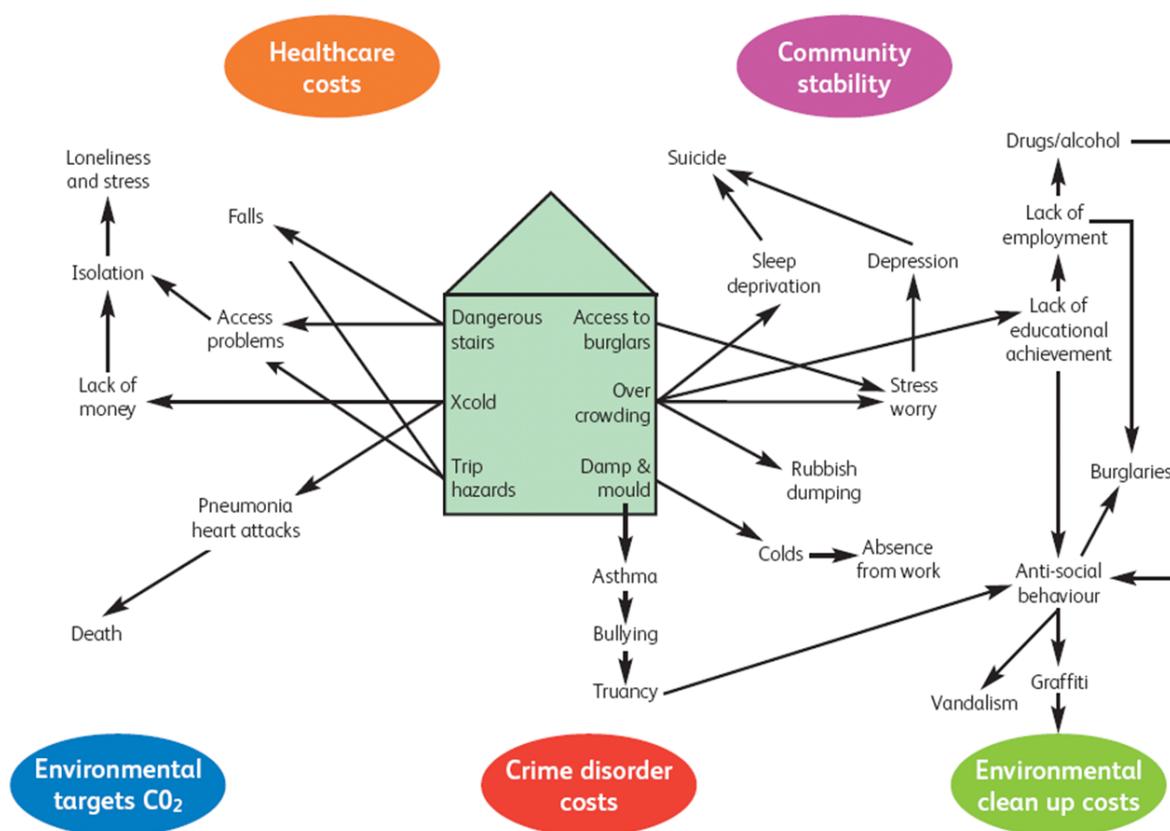
Almost half of the respondents to the survey (48%) said they lived in a property with mould and 44% in a home with damp. These can cause health conditions such as asthma and eczema. Nearly a fifth (19%) lived in accommodation with electrical hazards and 18% reported their homes were infested with animals such as mice, ants and cockroaches.

The Marmott review into health inequalities in England, 'Fair Society, Healthy Lives (2010)' found that mental health conditions such as depression, stress and anxiety are negatively affected by fuel poverty and cold housing, and more than 1 in 4 adolescents living in cold housing are at risk of multiple mental health problems compared to 1 in 20 adolescents who have always lived in warm housing. Cold housing increases the level of minor illnesses such as colds and flu and exacerbates existing conditions such as arthritis and rheumatism. The report also found an indirect link between cold housing and fuel poverty with children's educational attainment, emotional wellbeing and resilience; dietary opportunities and choices; and dexterity and an increased risk of accidents and injuries in the home.

The links between poor housing conditions and public health are further linked below, illustrated by a diagram taken from CIEH, "Good housing leads to good health" (2008). Poor conditions such as

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overcrowding, damp, indoor pollutants and cold have all shown to be associated with physical illnesses including eczema, hypothermia and heart disease. Housing can also impact on mental health as families try to cope with the stress of living in cold, damp conditions.



Bloomfield Ward in Blackpool is the most deprived Ward in England and as such fuel poverty and affordable warmth are a major issue. According to statistics from the Department of Energy and Climate Change (DECC) published on 30th June 2016, Bloomfield ward has the highest percentage of households in fuel poverty, with an average across the ward of 27.3%. As a numerical value this is an estimated 856 households in the Bloomfield ward who are fuel poor. In the Talbot ward the percentage was slightly lower at 20.4% with an estimated 652 households in fuel poverty and 18% in the Brunswick ward with an average of 614 households who are fuel poor. This shows the high level in these wards in comparison to other wards of Blackpool such as Park ward with 10.3% and Stanley ward with 7.5%. The Blackpool average of those households who are fuel poor is third highest in the North West with a percentage figure of 13.2% with an estimated 8633 households in fuel poverty. According to these figures this

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shows that 25% of all those 8633 households estimated to be living in fuel poverty in Blackpool live in the three wards of Bloomfield, Talbot and Brunswick.

A mapping exercise laying health data across Blackpool also shows high levels of cold related health conditions in this Ward, conditions which are generally linked to poor and under-heated housing. The build type and condition of the housing stock in this area rules out easy to treat insulation measures. To date in Bloomfield Ward 706 external wall insulation measures have been installed partly using Central Government funding with additional funding from Public Health to subsidise the cost of installation. The reasoning behind implementing these measures from a Council and Public Health perspective is to improve resident's homes making them a warmer healthier environment.

Residents have reported seeing a difference in their annual fuel bills and have noticed how much warmer their homes are. The intention is to continue the programme in this area and other LSOA's in Blackpool, but without continued support from Public Health this is unlikely to go ahead.

Review of Property Conditions in Blackpool

The 2008 Private Sector House Condition Survey showed that 38.7% of all private sector dwellings in Blackpool were classed as non-decent compared to an average 27.1% for England. The same survey found that poor housing conditions in Blackpool were mostly associated with pre 1919 properties, the private rented sector, converted flats, occupiers on the lowest incomes and those in receipt of benefits. 46.7% of private sector dwellings occupied by vulnerable tenants are estimated to be non-decent with the majority being concentrated in inner Blackpool.

Linking poor property conditions back to the Council's wider strategies and initiatives, in order to achieve the objectives set out in the Homelessness Prevention Strategy, the introduction of selective licensing alongside other tools would enable Blackpool Council to work with landlords to improve standards of accommodation and address issues that could potentially result in private sector tenants presenting as homeless within the designated area.

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11. How Selective Licensing will support reduced ASB and crime, lower levels of deprivation, and improved property conditions

ASB and Crime

Poor management by a significant number of landlords is a major contributor to issues that affect local residents, which can be demonstrated through the day to day work of the Police and Blackpool Council's Enforcement Team. There is strong evidence that many landlords are willing to house tenants without conducting appropriate reference checks or who are known to have a history of causing problems. Many properties are in such a poor quality within the proposed licensing area that it attracts people whom live chaotic lifestyles which more often than not contribute to negative activities in the area such as ASB.

The scale of the issues is such that just focusing on the limited number of individual enforcement actions that result from tenants' complaints is insufficient to address the widespread issues. By licensing these properties it is possible to require landlords to ensure that their tenants are suitable and behave in a way which reduces the risk of their tenants or visitors engaging in nuisance or ASB.

Selective licensing would mean landlords must adhere to the license conditions, to ensure that their premises comply with minimum standards of fire safety and security against burglary, and that licence holders proactively manage and tackle complaints of ASB involving their tenants and/or visitors to their property. Landlords will be made to ensure they are obtaining tenant references that show the tenant has a good history and is not likely to commit anti-social behaviour or crime.

In December 2017 a Closure Order was issued by the Magistrates Court on a property in the Central area. The property had blighted the lives of neighbours living on Bethesda Road, to the point where even an illegal squatter called the Police for help when a door was kicked in. The house had been a target for a fight between rival drugs gangs causing serious anti-social behaviour. Evidence for this Closure Order was obtained from residents during the comprehensive inspection programme of the additional licensing scheme.

Landlords will be required to undertake training, where appropriate, and be able to prove they are competent in meeting the licence conditions and have the right knowledge and experience to maintain their tenants and offer a quality offer of accommodation. This will enable the local authority to provide licence holders with the knowledge and expertise to improve the management of their properties and reduce ASB.

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Landlords are also required to provide the local authority with a management plan about how they will deal with complaints of anti-social behaviour regarding their tenants. This will safeguard the wellbeing of occupants, persons visiting the premises and persons in the immediate locality and help to reduce ASB.

Deprivation

Selective licensing will give us the opportunity to get behind the front door of properties we may never otherwise be able to. Those vulnerable people living behind those front doors may never otherwise get access to the support and assistance local authority staff and partners can provide through the inspection process. This document provides some case studies however the positive impact on life chances and future quality of life can also be told by those support services who work with us. Police and Fire clearly see the benefits, on individual people; families and more widely on communities. South Beach now can demonstrate stronger and more resilient communities and hoteliers in the area have already been contacting Blackpool Council requesting for a new scheme for a further five years following the expiry of the current scheme in March 2017.

Property Conditions

A high proportion of properties in the private rented sector in the Central area are old and poorly converted. Lack of investment is particularly an issue from the Planning Enforcement Team's view, and selective licensing could enable the inspections of many properties which are in need of modernisation and improvements both internally and externally. An example of where selective licensing could encourage more landlords to improve the standard of their properties is detailed below. A property in South Beach was referred to planning enforcement in 2012 by the selective licensing team for poor condition of the property. A letter was issued to the owner requiring improvements to be carried out to the property. Unfortunately no works were carried out, so further action was taken. A visit four months later revealed that some works had been carried out – half of the front of the property had been painted, the front gate had been removed, but a window to the rear had been smashed. The case was escalated to prosecution proceedings, but it became apparent that the owner had very poor health. The Council worked with the owner to allow him more time to complete the work. Prosecution proceedings were withdrawn and the owner accepted a simple caution. This work meant that the owner benefitted from being able to offer a better standard of accommodation; the tenants were able to benefit from a better and safer place to live; and the community benefitted from significant improvements in the external frontage of the property.

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Through licensing conditions the landlord has to ensure that the premises comply with the space and amenity standards and assessed alongside legislative requirements- see Fylde Coast Amenity and Space Standards guidance.

All properties should have a valid Energy Performance Certificate, which works to safeguard the health and wellbeing of the occupants with regards to the reduction of fuel poverty and national energy efficiency measures. They must be aware of the statutory requirements for EPCs and the new minimum energy efficiency standards introduced in April 2018 (MEES).

The next section will give an overview of the achievements in South Beach following the completion of the five year selective licensing scheme. It is important to note here that we can demonstrate that previous selective licensing schemes in Blackpool have made a real difference and tackled poor property condition; raised the aspirations of tenants living in the area; encouraged more stabilised and sustainable communities and engagement from landlords who are now offering a higher standard of accommodation.

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Having now also had the opportunity to evaluate the first year of the additional licensing scheme in Central we now feel we are able to benefit from the information contained within this report around the number of hazards identified and the number of vulnerable residents that we have been able to support and signpost into support services as part of our unique multi-agency approach to licensing. It is important to highlight the benefits of such a holistic approach. We now feel that this information supports our proposal to introduce selective licensing and, having seen the extent of issues being identified we feel that now is the right time to proceed with this proposal.

12. Experiences of previous schemes

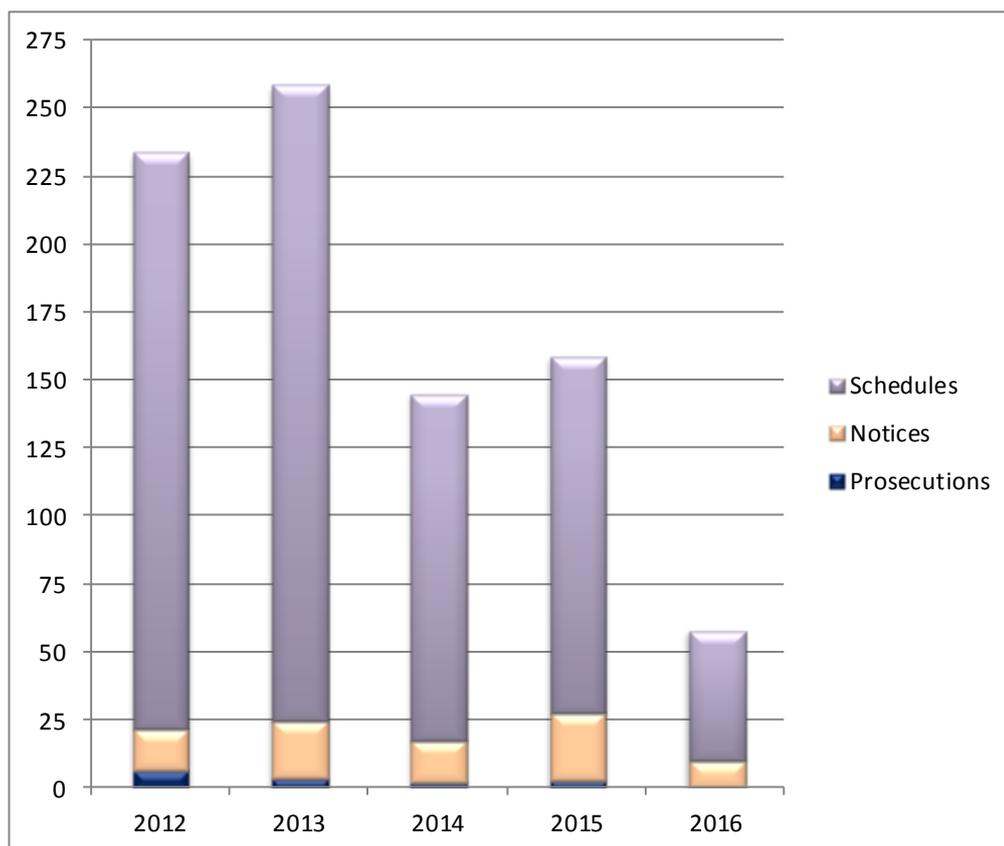
The selective licensing scheme in South Beach started in March 2012 and by 31st May 2013 99% of all landlords and managing agents in the area had complied in applying for a licence.

A comprehensive programme of inspections of private rented properties started in September 2012 in order to see if licence conditions are being complied with and this has identified a number of management issues where further action has been necessary.

Selective licensing powers have enabled local authority enforcement officers to gain access to nearly all of the private rented properties in the area through a comprehensive inspection programme to check compliance with licensing conditions. Without licensing, local authorities can only require landlords to provide access to their properties where there is reason to believe that the property standards are in breach of Housing Health and Safety Rating System requirements, usually following complaints.

The inspection programme has led to thousands of property condition issues being identified and addressed. In South Beach 87 enforcement notices and 752 schedules of work were issued during the licensing programme period. The large majority of these would not have been picked up and addressed without licensing.

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The statutory ground for introducing the scheme in South Beach was high levels of anti-social behaviour linked to privately rented properties. The dedicated ASB officer has worked with landlords and residents to help resolve complaints of ASB in the licensing area. This officer has encouraged safe reporting of ASB, encouraging tenants and landlords to acknowledge their responsibilities and make a real difference in improving the South Beach community. From the introduction of licensing in South Beach to the end of the programme, ASB levels have fluctuated, but there has been an overall trend of a small rise in ASB reports linked to private rented properties from the start of the programme in 2012/13 before a reduction by the end of the 5 year period.

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As well as enabling compliance with licence conditions to be checked, support has been offered to vulnerable tenants through the Transience Programme, and the Police and Fire Service have also been able to identify and respond to issues that would not otherwise have been identified. Across the area nearly half of all the residents met through the multi-agency inspection programme have received some form of intervention, including access to a GP or a dentist, support for improved mental or physical health, social isolation, or employment or volunteering opportunities.

To illustrate the complex nature of the ASB role an evaluation took place from the 1st April 2016 to identify an average week in the life of an ASB officer in South Beach. During the week the officer received 34 ASB complaints which were dealt with immediately and the opening of 11 new cases consisting of ASB of more complex nature requiring referrals and input from partners and dealt with 207 follow up actions.

By the end of the inspection programme our multi-agency team had:

- Engaged over 48% of South Beach residents with a continuing on- going process of engagement – some with complex, multiple needs (41%);
- Supported 39 people with complex needs into employment, for 26 of those people this was their first experience of employment;
- Supported residents with health, social care and other needs, 19% of the total population South Beach:

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- 26% received brief interventions around drugs and alcohol of which 7% were new and previously disengaged clients provided with support to remain engaged of which 75% of clients successfully completed treatment;
- 21% were registered with local GP's and dentists;
- 30% received social inclusion interventions;
- 23% received other health related support;
- 12% were referred into service for adult social care needs (including community mental health and Occupational therapy);
- 14% were supported for lower level adult social care needs.

Deprivation levels across the inner areas of Blackpool are the highest in the country. Licensing in South Beach has enabled the comprehensive inspection programme to access and support the most vulnerable individuals and families, and get behind the front doors of the properties in which they live. Poor property condition has been identified across the area; and housing enforcement officers have had to step in and issue many hundred schedules of work to bring these properties up to the minimum standard as detailed in the Housing, Health and Safety Rating System.

Multi-agency working has assisted in tackling the most prolific offenders in the area and encouraged heightened reporting of anti-social behaviour from residents, tenants and landlords alike. Officers have supported the South Beach community and provided extra resources to tackle the issues of most importance to those who live there.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

APPENDIX 1 CENTRAL DESIGNATED AREA NAMES

Streets in proposed Central Designated Area Page 1

Ashton Road	Butler Street	Durham Road
Abingdon Street	Cambridge Road	East Topping Street
Adelaide Street	Counce Street (2-180 & 1-131)	Edelston Road
Adelaide Street West	Cedar Square	Edward Street
Adelphi Street	Central Drive	Elizabeth Street
Albert Road	Chadwick Street	Erdington Road
Alfred Street	Charles Street	Fairhurst Street
Anderson Street	Charnley Road	Fenton Road
Back Ribble Road	Church Street	Field Street
Back Church Street	Clifton Street	Fisher Street
Back Read Road	Clinton Avenue	Fleet Street
Bank Hey Street	Coleridge Road (36-78 & 29-69)	Freckleton Street
Baron Road	Cookson Street	Gainsborough Road
Belmont Avenue	Coronation Street	George Street
Bethesda Road	Corporation Street	Gloucester Avenue (odds)
Birley Street	Danesbury Place	Gloucester Court
Bloomfield Road (31-67 & 76-92)	Deansgate	Gorton Street
Boothley Road (evens)	Devonshire Road (2-180 & 1-155)	Granville Road (1-27 & 2-100)

Proposal to designate a selective licensing scheme in Central Area, Blackpool

Buchanan Street		
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Streets in proposed Central Designated Area Page 2

Grosvenor Street	Kent Road	Montrose Avenue
Handley Road	King Street	Orme Street
Harrison Street	King Street South	Oxford Road
Havelock Street	Leamington Road	Palatine Road
Henry Street	Leeds Road	Park Road (1-147 & 2-100)
Heywood Street	Leicester Road	St John's Court
Hornby Road	Leopold Grove	Parker Street
Lawn Court	Lincoln Road	Peter Street
Lily Street	Liverpool Road	Platt Street
Hornby Court	Livingstone Road	Portland Road
Park Court	Longton Road	Princess Court
Lincoln Court	Louise Street	Princess Street
Courtfields	Manor Road	Princess Court (50-52 & 27-35)
Hull Road	Market Street	Priory Court
Ibbison Court	Maudland Road	Promenade
Iddon Court	Middle Street	Raikes Mews
Jameson Street	Milbourne Street	Raikes Parade

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Streets in proposed Central Designated Area Page 3

Reads Avenue	St Albans Road	Wood Street
Regent Road East	St Heliers Road	Woolman Road
Regent Road	Stanley Road	
Ribble Road	Stansfield Street	
Rigby Road (100)	Talbot Road (20-286)	
Ripon Road	Talbot Square	
Rishton Street	Topping Street	
Rydal Avenue	Vance Road	
Salthouse Avenue	Victoria Street	
Sands Way	Victory Road	
Saville Road	West Street	
Seed Street	Westbourne Avenue	
Selbourne Road	West View	
St Georges Court	Westwell Grove	
Selby Avenue	Whitegate Drive	
Seymour Road	Whiteside Street	
Sheppard Street	Winifred Street	
South King Street	Winstanley Grove	

Proposal to designate a selective licensing scheme in Central Area, Blackpool

<u>APPENDIX 2: PROPOSED SELECTIVE LICENCE CONDITIONS</u>	
<u>Conditions of Selective Licences under Part 3 of the Housing Act 2004</u>	
1	Gas
	<p>If gas is supplied to the house, the licence holder must provide to Blackpool Council a Gas Safety Certificate issued within the previous 12 months at the time of the application and thereafter annually or on demand.</p> <p>Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004</p>
2	Electrical Appliances
	<p>The Licence Holder must keep all electrical appliances and furniture supplied in a safe condition and must provide a declaration as to their safety at the time of application and thereafter on demand.</p> <p>Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004</p>
3	Furniture and Furnishings
	<p>The Licence Holder must ensure that furniture and furnishings supplied by them are compliant with the Furniture and Furnishings (Fire) (Safety) Regulations 1988 (as amended 1989 and 1993) and must provide a declaration as to their safety at the time of application and thereafter on demand.</p> <p>Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004</p>
4	Smoke Alarms:
	<p>The Licence Holder must ensure that smoke alarms are installed in the property and kept in proper working order and provide a declaration as to their condition and positioning to Blackpool Council on demand</p> <p>Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004 & to comply with minimum fire safety standards LACORS</p>
5	Tenant references
	<p>The licence holder must demand references from persons who wish to occupy the house and must provide evidence of pre-let reference checks undertaken to the Council upon request.</p>

Proposal to designate a selective licensing scheme in Central Area, Blackpool

	Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004
6	Terms of Occupation:
	<p>The Licence Holder must supply to the occupiers of the house a written statement of the terms on which they occupy the property. A copy of the terms will be provided to the Council on demand.</p> <p>Reason: Mandatory condition required by Schedule 4 of the Housing Act 2004</p>
7	Numbers of Occupiers
	<p>The Licence Holder must ensure that rooms other than bedrooms are not used for sleeping purposes.</p> <p>Reason: to ensure that the premises comply with the space and amenity standards and assessed alongside legislative requirements- see Fylde Coast Amenity and Space Standards guidance</p>
8	Energy Efficiency
	<p>Each new tenancy will require a valid Energy Performance Certificate which must comply with current government guidance. This should be submitted upon application for a licence.</p> <p>Reason: To safeguard the health and wellbeing of the occupants with regards to the reduction of fuel poverty and national energy efficiency measures and to be aware of the statutory requirements for Energy Performance Certificates (EPCs).</p>
9	Property Management
	<p>The Licence Holder must ensure that:-</p> <p>All repairs to the house or any installations, facilities or equipment within it are carried out by competent and reputable persons.</p> <p>All occupants of the house receive written confirmation detailing arrangements in place to deal with repairs and emergencies and report nuisance and anti-social behaviour.</p> <p>If accommodation is provided on a furnished basis and includes electrical appliances, the Licence Holder must provide the occupier copies of user manuals or equipment provided as part of the agreement for the occupation of the house.</p> <p>All occupiers are made aware of the licence and conditions.</p>

Proposal to designate a selective licensing scheme in Central Area, Blackpool

	Reason: to safeguard the health, safety and wellbeing of occupants and to reduce Anti-Social Behaviour (ASB).
10	Common Areas
	<p>Where the dwelling is a flat in a block and the licence holder is the owner or manager of the block, the licence holder must ensure that:</p> <p>Common areas, including shared living rooms, kitchens, hallways, etc. are not used for sleeping, either by tenants or their guests;</p> <p>Corridors, stairways and lobbies are fitted with emergency lighting in accordance with BS5266;</p> <p>A cleaning regime is demonstrated on request to ensure that all corridors, stairways, lobbies and all exit routes are kept free from obstruction and combustible material;</p> <p>Smoking is not permitted in any common areas and ‘no smoking’ signs should be displayed where the dwelling is a flat in a block and the Licence Holder is the owner or manager of the block. (Health Act 2006);</p> <p>Reason: to safeguard the health, safety and wellbeing of occupants in the event of fire.</p>
11	Fire Safety
	<p>The Licence Holder will inform the local authority of any changes to the positioning of smoke alarms and if the property is a house in multiple occupation, produce a Fire detection and alarm certificate on request.</p> <p>The Licence Holder must also produce a comprehensive fire risk assessment which should be regularly reviewed and produced upon request.</p> <p>Reason: to safeguard the health, safety and wellbeing of occupants in the event of fire. The Fire Safety Guidance is provided by LACORS, see www.lacors.gov.uk. http://www.lacors.gov.uk/lacors/upload/19175.pdf The Housing- Fire Safety guidance on fire safety provisions for certain types of existing housing can also be found at Blackpool Council Website www.blackpool.gov.uk under Housing- Selective Licensing.</p>
12	Security

Proposal to designate a selective licensing scheme in Central Area, Blackpool

	<p>The Licence Holder must ensure that:-</p> <p>a) The security provisions for the access to the dwelling (including but not limited to locks, latches, deadbolts and entry systems) must be maintained in good working order at all times.</p> <p>b) Where window locks are fitted, the Licence Holder will ensure that keys are provided to the relevant occupant free of charge</p> <p>c) Where a burglar alarm is fitted to the house, the Licence Holder will inform the occupant in writing the circumstances under which the code for the alarm can be changed, and provide details when required on how this can be arranged.</p> <p>d) Where previous occupants have not surrendered keys, the Licence Holder will arrange for a lock change to be undertaken, prior to new occupants moving in.</p> <p>e) Where alley gates are installed to the rear of the licensed property, the licence holder must take responsibility for holding a key and make satisfactory arrangements for the occupiers' access. The occupier(s) must be provided with an alley gate key free of charge at the start of the tenancy.</p> <p>Reason: to safeguard the health, safety and well-being of occupants in the event of fire and entry by intruders and reduce ASB.</p>
13	External areas, refuse and waste
	<p>The Licence Holder must ensure that:-</p> <p>The exterior of the property is maintained in a reasonable decorative order and state of repair;</p> <p>At all times any gardens, yards and other external areas within the curtilage of the house are kept in reasonably clean and tidy condition and free from rodent infestation, and;</p> <p>Suitable and adequate provision is made for storage of refuse generated in the property throughout each tenancy and that occupants use receptacles provided by the Council for storage prior to collection. The receptacles or plastic refuse sacks where receptacles have not yet been issued must not be exposed for a period longer than 12 hours prior to collection and must not cause obstruction at any time.</p> <p>The occupier is made aware of the arrangements for the collection of refuse and bulky goods, and any instructions given in writing of where/when/how the occupier must put out and return waste</p>

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	<p>receptacles on the day of collection.</p> <p>Access must be available at all times to adequate, external, refuse storage.</p> <p>The Licence Holder must ensure that any kind of refuse which the Council will not ordinarily collect (e.g. large items, hazardous waste) are disposed of responsibly and appropriately.</p> <p>Make appropriate arrangements for the disposal of any waste throughout, at the end of a tenancy and produce waste transfer notes for inspection on request.</p> <p>Reason: to ensure that the domestic hygiene and condition of the licensed property is maintained and reduce ASB.</p>
14	<p>Training</p> <p>The Licence Holder and/or Manager will need to demonstrate competence of managing private rented accommodation and shall undertake property management training courses where required to do so by the authority.</p> <p>Reason: to enable the Council to provide licence holders with the knowledge and expertise to improve the management of their properties and reduce ASB.</p>
15	<p>Management/ Anti-Social Behaviour</p> <p>The Licence Holder must take reasonable and practical steps to reduce or prevent anti-social behaviour by persons occupying or visiting the house and the use of premises for illegal purposes.</p> <p>The licence holder must:</p> <ul style="list-style-type: none"> • Provide a written action plan or copies of their own ASB procedures already in place to Blackpool Council outlining their processes for dealing with anti-social behaviour at the time of application. This must be reviewed annually and submitted on request. • Obtain tenant references prior to granting a tenancy as to previous tenancy conduct, including behaviour of the proposed occupier and household. The Licence Holder needs to have due regard to what the reference says and be satisfied that the tenant is not likely to cause any anti-social behaviour. • If a Licence holder receives a reference request for a current or former tenant for the purposes

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of an application to rent a property from another Licence Holder he must respond to the request in writing within a reasonable period and either i) decline the request for a reference; or ii) when giving a reference state whether or not he is aware of any allegations of anti-social behaviour made against the tenant and if such allegations have been made give details of the same including details of whether (to his knowledge) the allegations have been admitted or have been found proven in any court or tribunal.

- Require any prospective tenant to disclose unspent criminal convictions when applying for a tenancy. Where the prospective tenant discloses unspent criminal convictions the Licence Holder must demonstrate that due consideration was given to whether those convictions indicate a real risk that the prospective tenant is likely to commit acts of antisocial behaviour.
- Cooperate with Blackpool Council, Lancashire Constabulary and other agencies in resolving complaints of anti-social behaviour. The Licence Holder and/or their nominated managing agent are required to undertake an investigation of any complaints regarding their tenants. Written records of these will be required.
- Make regular (at least quarterly) inspections of the property to ensure that the property is in a decent state of repair and that the occupiers are not in breach of tenancy terms and conditions.
- Ensure that each tenant is made aware that they are responsible for their own behaviour and the behaviour of other occupiers and visitors. Tenants must be made aware that if they, other occupiers, or their visitors: Cause nuisance or annoyance to neighbours; or use abusive or threatening language or behaviour to neighbours; or fail to store or dispose of refuse properly; or cause damage to fixtures, fittings, fire prevention or alarm equipment or installations, or to the fabric of the premises; or fail to give access to the landlord or his agent for the purpose of maintaining communal areas or, upon reasonable notice, to inspect or undertake works within their accommodation. They will be liable to enforcement action which may include possession proceedings either under the terms of the tenancy, pursuant to s.21 of the Housing Act 1988 or pursuant to Grounds 13 or 14 of Schedule 2 to the Housing Act 1988.
- Provide the occupants of adjoining properties with direct contact details in case of an emergency, or to enable them to inform the licence holder of problems affecting their properties.
- Take all reasonable steps to deal with nuisance and/or ASB perpetrated by the occupier(s) and/or visitors to the property. This includes taking proactive action (e.g. warnings, legal action),

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	<p>as soon as the licence holder is made aware of a problem and must co-operate fully with the relevant agencies.</p> <p>Reason: to safeguard the wellbeing of occupants, persons visiting the premises and persons in the immediate locality and reduce ASB.</p>
16	Notification/Consultation of Changes
	<p>The Licence Holder and managing agents must consult with Blackpool Council before making any material changes to the layout, amenity provision, fire precautions or occupation of the house and must inform Blackpool Council of:</p> <ul style="list-style-type: none"> • Details of any unspent convictions not previously disclosed to the Local Authority that may be relevant to the Licence Holder and/or the property manager and their fit and proper person status and in particular any such conviction in respect of any offence involving fraud or dishonesty, or violence or drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003; • Details of any finding by a court or tribunal against the Licence Holder and /or the manager that he/she has practiced unlawful discrimination on grounds of sex, colour, race, ethnic or national origin or disability in, or in connection with, the carrying on of any business; • Details of any contravention on the part of the Licence Holder or manager of any provision of any enactment relating to housing, public health, environmental health or landlord and tenant law which led to civil or criminal proceedings resulting in a judgment or finding being made against him/her; • Information about any property the Licence Holder or manager owns or manages or has owned or managed for which a local housing authority has refused to grant a licence under Part 2 or 3 of the Act, or has revoked a licence in consequence of the Licence Holder breaching the conditions of his/her licence; • Information about any property the Licence Holder or manager owns or manages or has owned or managed that has been the subject of an interim or final management order under the Housing Act 2004; • The property becoming empty;

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	<ul style="list-style-type: none"> • Changes to liability insurance: • Notification of repossession/foreclosure • Successful claims against the licence holder for default of tenancy deposits. • Change in managing agent or the instruction of a managing agent; • The undertaking of substantial works to the property, including conversions and modernisations or emergency problems relating to fire, flood or disaster and the tenants are made temporarily homeless. <p>Reason: to safeguard the health, safety and wellbeing of occupants in the event of changes during the period of the licence and reduce ASB.</p>
17	Absence
	<p>The licence holder is required to have in place suitable emergency and other management arrangements in the event of their absence. The name and contact details of the licence holder and/or manager must be supplied to each occupier and must also be on display in a prominent place.</p> <p>Reason: to safeguard the health, safety and wellbeing of occupants in the event of temporary absence of persons in control and reduce ASB.</p>
18	Compliance inspections
	<p>The licence holder must allow the Council to undertake compliance checks. Council Officers will give the licence holder 48 hours' notice of these checks and produce valid authorisation at the time of visit.</p> <p>Reason: To ensure that the property complies with the Housing Act 2004 and licence conditions.</p>
19	Consequences of failing to meet the Blackpool Standard upon inspection
	<p>Any licence that has been granted with a discounted fee based on meeting the Blackpool Standard must adhere to the Standard for the entirety of the licence period. The Council reserve the right to inspect the property at any time during the licence period to ensure standards are maintained.</p> <p>Failure to maintain the Blackpool Standard will result in the full licence fee being</p>

Proposal to designate a selective licensing scheme in Central Area, Blackpool

	<p>made payable to the Council within 30 days.</p>
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Reason: To ensure all licence holders who apply for and successfully meet the Blackpool Standard comply with the requirements of the Code of Practice.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

Appendix 3: Risk Assessment Table

Description of Risk	Description of Impact	Probability of Risk	Level of Impact	Risk prevention, management or mitigation
<p>1a. Landlords do not apply or are reluctant to apply for licences.</p> <p>1b. Landlords apply for Judicial Review of the designation.</p>	<p>ASB and other problems are not resolved.</p> <p>Landlords operate illegally.</p> <p>LA resources are taken up with enforcement and prosecutions.</p> <p>LA resources are taken up with defending an application for Judicial Review.</p>	Medium	High	<p>Undertake a thorough consultation process with plenty of opportunities for input, and effective communication of new scheme.</p> <p>Landlords also engaged with by means of the Fylde Coast Landlords Forum.</p> <p>Wide range of detailed evidence gathered to support the scheme</p> <p>Intended outcomes of the proposals promoted to landlords, including an overall improvement in the area.</p> <p>Proposals prepared following all available guidance and best practice learned from other local authorities including those whose schemes have been the subject of Judicial Review applications.</p>
2. A number of landlords evict tenants and sell their properties or leave them	<p>Increase in abandoned and vacant properties.</p> <p>Loss of rental properties</p>	Medium	High	<p>The Council's strategy is to encourage alternative tenures and the de-conversion of HMOs into a smaller number of units with a better balance of house</p>

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<p>vacant. Speculative landlords choose to invest elsewhere</p>	<p>Increase in homelessness.</p>			<p>types. A reduction in HMO uses would be consistent with this transition.</p> <p>Empty properties will be monitored and managed as part of the scheme.</p> <p>There is sufficient capacity within the local market to mean that a small reduction in total numbers of homes available will not lead to increased homelessness.</p> <p>The Housing Options Team will work closely with the Enforcement team around individuals at risk of homelessness because of enforcement action, finding them alternative accommodation.</p>
<p>3. Local Authority inadequately manages the scheme or inadequately resources the scheme</p>	<p>Need to revoke the designation before the end of the 5 year period.</p> <p>ASB and other problems are not resolved.</p> <p>Resources spent in the research and implementation of the scheme are wasted.</p> <p>Inadequate resources</p>	<p>Low</p>	<p>High</p>	<p>Full business model drafted to show resource implications for the duration of the scheme and management decisions made on the basis of this.</p> <p>Fees set to cover proportionate costs of the scheme.</p> <p>Additional staff employed as necessary to administer scheme, undertake property inspections and help ensure existing statutory functions are maintained and minimise impact</p>

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	in place to undertake other statutory and non-statutory functions.			on non-statutory functions. Competent and experienced staff employed as necessary. Scheme is managed and resourced for the five year life of the scheme.
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Proposal to designate a selective licensing scheme in Central Area, Blackpool

Appendix 4 – Proposed designation

Blackpool Council

Designation of an area for selective licensing

Blackpool Council Designation of an Area for Selective Licensing 2018

Blackpool Council in exercise of their powers under section 80 of the Housing Act 2004 (“the Act”)

Hereby designates for selective licensing the area described in paragraph 4.

CITATION, COMMENCEMENT AND DURATION

1. This designation may be cited as the Blackpool Council Designation for an Area for Selective Licensing 2017.

2. This designation is made on the xx day of x 2018 and shall come into force on the xx Day of xx 2018.

3. This designation shall cease to have effect on the xx day of x 2023 or earlier if the Council revokes the scheme under section 84 of the Act.

NB the designation will be reviewed by the xx of x 2023.

AREA TO WHICH THE DESIGNATION APPLIES

This designation shall apply to the Central area as delineated and edged blue on the map and in the streets listed at Annex A.

Proposal to designate a selective licensing scheme in Central Area, Blackpool

APPLICATION OF THE DESIGNATION

5. This designation applies to any house (1) which is let or occupied under a tenancy or licence within the area described in paragraph 4 unless:-

- (a) The house is a house in multiple occupation and is required to be licensed under Part 2 of the Act (2);
- (b) The tenancy or licence of the house has been granted by a registered social landlord (3);
- (c) The house is subject to an Interim or Final Management Order under Part 4 of the Act;
- (d) The house is subject to a temporary exemption under section 86 of the Act, or
- (e) The house is occupied under tenancy or licence which is exempt under the Act (4) or the occupation is of a building or part of a building so exempt as defined in Annex B;

EFFECT OF THE DESIGNATION

6. Subject to sub paragraphs 5(a) to (e) every house in the area specified in paragraph 4 that is occupied under a tenancy or licence shall be required to be licensed under section 85 of the Act (5)

7. Blackpool Council will comply with the notification requirements contained in section 83 of the Act and shall maintain a register of all houses registered under this designation, as required under section 232 of the Act (6).

This designation is made on the day of xxxx and

THE COMMON SEAL of

Proposal to designate a selective licensing scheme in Central Area, Blackpool

THE BLACKPOOL

COUNCIL was hereunto

affixed in the presence

of: -

Head of Legal Services

1 For the definition of “house” see sections 79 and 99 of the Act

2 Section 55 of the Act defines which Houses in Multiple Occupation are required to be licensed under the Act. See also The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2005 (SI 2006/371)

3 Section 79 (3) of the Act. For definition of a Registered Social Landlord see Part 1 of the Housing Act 1996.

4 Section 79 (4) of the Act and SI 370/2006

5 Section 86 of the Act provides for certain temporary exemption. As to suitability see section 89. Note, if the house is not suitable to be licensed, the Council must make an Interim Management Order – see section 102.

6 Section 232 of the Act and paragraph 11 of the SI 373/2006.