# Proposal to designate an Additional Licensing scheme in the Central area Summary of Consultation Responses April 2016

# Blackpool Council



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#### 1. Introduction

Consultation on a proposal to introduce Selective and Additional Licensing in the Central area of Blackpool took place between 17<sup>th</sup> July 2015 and 25<sup>th</sup> September 2015. This report summarises the responses received through the range of consultation methods employed. Blackpool Council has taken into account the responses set out in this report before bringing forward revised proposals for additional licensing in the Central area to be considered at the Council's Executive in April 2016, and further developing proposals for selective licensing in the Central area.

The Council believes that the consultation that was undertaken is sufficient to underpin final, revised proposals. The consultation proposals and the reasons for them were sufficiently set out to enable those consulted to consider the proposals intelligently and make an intelligent response. The Council has considered the responses to consultation and undertaken a general review of the proposals, resulting in changes being made to the proposals and a decision to proceed initially with additional licensing alone. But these changes are not such as to require further consultation before proceeding.

The consultation was publicised through:

- Blackpool Council's website
- The Fylde Coast Landlords Forum
- 8 consultation meetings
- 7,000 letters which were sent to residents, business owner and landlords within the proposed Central area as well as the wider consultation area.

#### 2. Comments from Consultation Meetings and Landlord Associations

Landlords, residents and landlord associations (the National Landlords Association (NLA) and Residential Landlords Association (RLA)) were given the opportunity to provide feedback, voice concerns and ask questions relating to the introduction of Selective and Additional Licensing within the central areas of Blackpool. All feedback has been collated, read and has been summarised under the categories listed below along with Blackpool Council's response.

#### 1. Rationale

## a. Is Selective and Additional Licensing required when the Council already has enforcement powers?

Landlords and some residents feel that the Council already has sufficient authority to respond to issues arising from private rented properties. For this reason they have requested further clarity on what the introduction of Selective and Additional Licensing into the Central area would deliver.

#### Council's response:

The Housing Act 2004, Part 1, gives 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. Selective and Additional 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 (ASB) complaints are raised against their tenants.

The introduction of Selective and /or Additional Licensing will provide clear standards to be met within the private rented sector enabling tenants to have a clear benchmark and for landlords to clearly know their responsibilities. It will identify landlords whose management arrangements are inadequate and ensure improvements are carried out. The scheme will promote a more comprehensive approach than has previously been possible in tackling crime, ASB, environmental and HMO management issues and for action to be taken against landlords who do not take reasonable steps to reduce the problems.

#### b. Area for Selective and Additional Licensing

Some respondents asked how the Council defined the Central area and one suggested that consideration be given to taking Gloucester Avenue and St

Alban's Road out of the scheme area. Residents and landlords asked whether the Council had any plans to further extend the licensing schemes into wider areas of Blackpool and sought confirmation that approval from the Secretary of State will be sought.

#### Council's response:

The Council has taken a number of factors into account to define the boundary of the area for the proposed licensing, in the context of the statutory criteria that need to be met before Selective and Additional Licensing schemes can be designated. Along with the existing licensing areas of South Beach and Claremont, the Central area has a very high concentration of privately rented properties, and especially HMOs in converted buildings with high turnover. There are significant problems with poor management, and poor conditions, with antisocial behaviour caused by private tenants having negative impact on the wider community.

The boundaries to the north and south of the area are defined by the existing selective and additional licensing areas. The boundary to the east of the area is Devonshire Road/ Whitegate Drive, where there is a clear division between intense problems to the west and better conditions with fewer problematic private rented properties to the east. The south eastern boundary of the area is also defined by evidence of where problems are greatest.

The Council has reviewed ASB and crime data for Gloucester Avenue and St Alban's Road and concluded that these streets should remain within the area for additional licensing in the final proposal. Additional licensing will only apply to HMOs that meet the statutory criteria, so will not in any case apply to many properties in Gloucester Avenue and St Alban's Road.

There are currently no plans to extend selective and additional licensing to areas beyond the Central area. Confirmation from the Secretary of State will be sought for the introduction of selective licensing to the Central area, but this is not required for an additional licensing designation.

#### c. Purpose of Selective and Additional Licensing

Whilst one of the proposed outcomes of Licensing is to reduce anti-social behaviour, residents and landlords have asked for more detail around the linkage of Selective/Additional Licensing and crime reduction rates and its links to the private rented sector. Points were also raised that anti-social behaviour is also caused by social housing tenants.

#### Council's response:

Anti-Social Behaviour (ASB) and crime are significant problems for the Central area. Blackpool experiences the highest recorded crime rates in Lancashire, and the highest rates in Blackpool are within the South Beach, Claremont, and Central areas. The Crime and ASB figures used in the consultation proposal were provided by the Community Safety Partnership team. Given the status of Blackpool as a major resort town, there are clearly a lot of incidents of crime and ASB in inner Blackpool that are not caused by residents and not caused by private rented tenants. To understand the extent of crime and ASB linked to the private rented sector, Blackpool Council identified privately rented properties by 'mapping' them and overlaying the Police database – the results showing that 52% of ASB and 43% of Crime incidents within the Central Area were linked to privately rented properties.

Some respondents to the consultation queried the robustness of Police data on ASB and how it is recorded. Further interrogation of the data shows that ASB is indeed strongly linked to private rented properties in the Central area, and especially to HMOs. Further investigation of a sample of the original reports of ASB that were linked to private rented property addresses in the Central area has shown that in all but a handful of cases, reports of ASB recorded by the Police did reflect the site of the incident and not just the address from which the report originated.

It is further incumbent on the Council to demonstrate that crime and ASB linked to private rented accommodation is the result of poor management by a significant number of landlords. This can only be demonstrated through the day to day work of the Police and Council Enforcement team. There is strong evidence

that many landlords are willing to house tenants without references or who are known to have a history of causing problems in previous accommodation. Many properties offer such a poor quality of accommodation that is only attractive to people have no other choices and are willing to accept anything. The quantitative evidence for this is the very high number of enforcement notices that are issued and the high number of successful prosecutions of landlords. But 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.

There are problems with anti-social behaviour from social housing tenants, but these are not the majority of problems in the Central area because of the relatively small numbers of social rented homes in the area, and because social landlords do invest significant resources in dealing with ASB issues. Social landlords are already required by their regulator - the Homes and Communities Agency - to work closely with Councils in dealing with any issues that arise. Selective and Additional licensing schemes cannot legally be applied to social landlords' properties.

d. Landlord Associations require further clarity on how Licensing will help address the wider social problems within the proposed licensing areas. There are also concerns that Selective/Additional Licensing could lead to homelessness as landlords maybe reluctant to house known offenders.

#### Council's response:

Blackpool faces significant levels of deprivation and social problems. Whilst there have been some successes in tackling issues across the area, until properties within the privately rented sector are better maintained and managed, they will continue to attract and tolerate tenants who cause problems for the wider community. In this way, licensing is at the heart of efforts to address social problems. However, it is not in itself sufficient to address all of the social issues. Besides the usual statutory support services, the principal complementary investment that the Council will make in the area is through the Transience Programme. This is funded by Government following a successful bid by the

Council and employs support workers to find tenants with on-going issues and get them engaged with support services, local community activities, and programmes to get people into work.

Selective and Additional Licensing should not lead to homelessness; the licensing scheme aims 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 pose an immediate risk to their health and safety. In these cases, the Enforcement team will work closely with the Council's Housing Options service to ensure that alternative accommodation is made available.

Selective and Additional licensing may make it less likely for known offenders to find independent accommodation in the Central area, but it is right that in an area of concentrated problems, there is less housing of unsupported problematic offenders. The Council does, however, work closely with partner agencies in the probation services and Police to find appropriate accommodation for the resettlement of offenders, with the right support. Where the right support is in place and the wider community is not placed at risk, landlords will be able to have confidence in letting properties to offenders and still comply with the licence conditions.

e. *Effectiveness of existing schemes (South Beach and Claremont)*: Landlords and residents have asked for more evidence to demonstrate that the claimed improvements in the South Beach and Claremont areas are a direct result of implementing Selective Licensing there.

#### Council's response:

The final proposal document sets out the available evidence from the South Beach and Claremont schemes. While the outputs from the schemes can be readily quantified, for example, the numbers of properties licensed and cases where licensing has led to intervention by public services, it is inevitably more difficult to attribute positive outcomes specifically to selective and additional

licensing. This is especially the case where extra investment is being made in the areas, such as through the Transience Programme.

f. Alternatives to Selective/Additional Licensing: Landlords, residents and Landlord Associations would like the Council to consider alternative options to Selective and Additional Licensing such as, i) adopting the scheme implemented in Doncaster and Southend, ii) licensing individual tenants who cause anti-social behaviour, iii) to make it a mandatory requirement for all private landlords to have a Lettings Agent in place or iv) adopt the 'Co-Regulation' proposal suggested by the RLA

#### Council's response:

The final proposal sets out the alternative approaches that have been considered following consultation responses. Some of these approaches, like accreditation, have been tried previously without success in Blackpool. Other suggested approaches still use selective and/or additional licensing but outsource the verification of landlords' credentials and inspection of properties to ensure compliance with licence conditions. Given the extent and severity of issues in the Central area of Blackpool, and the tendency for properties to drift between holiday and HMO uses, it is considered that all affected landlords should have to comply with management conditions, and that using in-house staff to manage the licensing scheme ensures consistency with wider regulatory activity.

With regard to suggestions of licensing individuals or requiring landlords to use managing agents, the Council does not have any legal powers to take these approaches. Anti- Social Behaviour legislation is used to tackle individual cases of tenants causing ASB where applicable.

#### 2. Delivering Blackpool Council's Proposal

a. **Licence Exemptions:** Who will be licensed and will the Council give consideration to exempt good landlords from the scheme? Many landlords commented that

good landlords should not have to get a licence but that only bad landlords should be targeted.

#### Council's response:

As required by the relevant legislation, all landlords will be required to obtain a licence for each property that is let within the designated area, and which falls within the licensing criteria. Selective and additional licensing schemes take a comprehensive approach to ensure that there are consistently high standards of management and property conditions within the area. We anticipate that licensing will improve standards within the market as a whole, thus benefiting responsible landlords.

b. *Identification of private rented properties:* Landlords asked what steps will be taken to ensure correct contact details are used to send further communication, such as licence application forms (including land registry checks).

#### Council's response:

Blackpool Council uses a number of databases to check landlord addresses which include; i) Land Registry information, ii) the Council's property database and iii) the Council's Housing Benefit and Council Tax database. It is important for landlords to ensure their contact details are up to date.

c. Fees: Landlords and residents have requested further details on licence fee calculations and how they benchmark against other Local Authorities. Many landlords felt that the proposed fees are unreasonably high and should be less. They would also like more details on how the money collected through fees will be spent and whether consideration will be given to offer further discounts.

#### Council's response:

The Council has reviewed the processes involved in administering the scheme to ensure the fees are set at the right level. The processes are well established from the South Beach and Claremont selective and additional licensing schemes so the

review of costs for the Central area reflects the knowledge gained from this experience. The review showed that the costs to administer the licensing schemes have increased. We acknowledge the fees proposed have caused financial concerns to some landlords and for this reason Blackpool Council will absorb these additional costs.

The final proposal confirms the licence fees and discounts where applicable. The basic fee structure remains the same, to reflect the costs of administering the scheme. The changes to fees that are proposed following consultation responses are:

- Additional fees for late or incorrect applications have been omitted because the costs of collecting the additional fees can be uneconomic.
- The fee for variations of licences, for example through changes in ownership, has been reduced to ensure that it only reflects the costs of carrying out now fit and proper person checks.

The principal areas of work from which the fees are built us are:

- Preliminary Checks Property Use, Planning & Building Regulations checks,
  Council tax, Land registry, Legal status
- Procedural Checks Request & Check Documentation, Annual Gas certs x 5 years,
  Referrals to Gas Safe/HSE, Return to Applicant if incomplete, Fit and proper checks undertaken, Application re complete
- Licence Inspection Ensure compliance with licence conditions and check management
- Review & Monitoring Over the Term of Licence Ensure landlord compliance with licence conditions, annual safety checks and management of current and new tenancies within the 5 year period

 ASB Monitoring and Support, including employing dedicated ASB Officers to work with licensed landlords

The fee levels are similar to those in most other local authority areas where selective and additional licensing schemes are in place. The approach in Blackpool includes ensuring that all licensable properties are inspected to ensure compliance with licence conditions, and providing dedicated ASB officers. This helps to maximise the positive impact of the schemes.

d. **Multiple Licensing:** Is there a requirement for a landlord to purchase one licence per property?

#### Council's response:

Yes. Each property will be required to be licensed.

e. **Buying and selling licensed properties:** Landlords would like to have a better understanding of the legal impacts of purchasing and selling selective licensed properties including repossessions.

#### Council's response:

The Council does not anticipate that Selective and Additional Licensing will impact adversely on the purchasing and selling of properties. We recommend that landlords have discussions with their solicitors during the conveyancing process to ensure that purchasers are aware of licensing requirements and understand, where applicable, that licences for a 5 year period have already been obtained. New purchasers are required to apply for a new licence and undergo the fit and proper person checks, but new purchasers are required only to pay the variation fee of £140 per licence, rather than the full cost, where there has already been a valid licence in place for a property.

f. **Property Inspections:** Some landlords commented that landlords cannot be held responsible for how tenants behave and how tenants treat their properties,

especially where tenants cause damage to properties or do not dispose of refuse responsibly.

#### Council's response:

Landlords are not directly responsible for the behaviour of their tenants. However, there is a strong correlation between badly managed, poor quality rental properties and ASB. For this reason, it is important that landlords take a responsible approach to letting their properties and a proactive approach to housing management, encouraging their residents to behave responsibly, being available if there are any issues, and taking appropriate action where tenants are in breach of their tenancy conditions. In HMOs it is especially important that tenants understand and comply with management arrangements such as refuse disposal and are held to account by landlords if they do not.

#### 3. Finance

a. Impact of reduced appetite for lending by mortgage lenders: Whilst it is anticipated by the Council that Selective/Additional Licensing will ultimately help improve conditions, values, and rents in the area, further evidence is required to support this prediction. There are also concerns that banks and mortgage lenders may be less willing to lend in Selective Licensing areas.

#### Council's response:

Evidence from a report undertaken on behalf of the Department of Communities and Local Government in 2010 looking at the impact of selective licensing schemes, shows no evidence of 'market collapse' as a result of licensing. The biggest improvements in the market conditions were found in the authority whose designation was made on the grounds of ASB, as proposed in Blackpool, rather than Low Demand.

It is accepted that in some cases, mortgage lenders have been reluctant to lend in selective licensing areas, but this simplistic approach is not taken by all financial

institutions, and the availability of mortgage finance is predominantly contingent on lenders being satisfied that the relevant property will hold its value and that income streams will be sufficient to repay the funds borrowed. Licensing schemes should contribute to making lending conditions more attractive in the long run.

b. Flexibility in making licence fee payments: Some landlords said that the scheme would be less onerous if licence fees could be paid in instalments over the 5 year period instead of all of the fees being due up front, especially where landlords own a number of properties within the licensing area.

#### **Council's response:**

Requiring the payment of fees up front minimises the costs of administering the scheme, Payments can be made in instalments for the first 12 months. In the instance where a landlord can prove financial hardship the Council will give consideration to devising a more tailored repayment agreement.

c. *Impact on rents*: Some landlords and tenants commented that requiring landlords to pay licence fees would lead to increased rents as landlords sought to pass on their costs.

#### Council's response:

The cost of licence fees over a 5 year period, relative to rental income received, is very small. All landlords operate within a wider market, which for most landlords and tenants in the Central area is also influenced by Local Housing Allowance rates. Landlords may wish to pass on costs to tenants through rents but in reality rents are set by the "market" and not by landlords' costs. For example, there is no direct effect on rents of changes in mortgage interest rates or tax obligations which are also costs for landlords. In the same way, it is not expected that the cost of licensing fees will be passed on to tenants through rents.

#### 4. Penalties

a. Implications for not applying for a Selective/Additional Licensing: Landlords and residents would like to have a better understanding of the possible sanctions should they choose not to apply for a licence. Furthermore, would there be an additional penalty if a licensed property is found to be in a poor condition?

#### Council's response:

It will be a criminal offence to rent a property without a licence. Doing so could result in prosecution, with a fine of up to £20,000. Additional measures may be introduced when a landlord fails to obtain a licence. These include: i) a Management Order, taking control of the property from the landlord or ii) a rent repayment order (RRO) for up to 12 months rental income.

If a property is found to fall below minimum property standards then a schedule of works will be given to the landlord. If the landlord fails to complete this work then the Local Authority, in line with the Housing Act 2004, can take additional action to address non-compliance, such as Improvement Notices and Prohibition Orders.

#### 5. Support

a. Support for vulnerable tenants and Landlords: Landlords and residents would like to understand the provisions that will be put in place to support vulnerable tenants living in properties in poor condition, particularly where enforcement action could leave them facing eviction. Also, whether support will be provided for both residents and landlords to help them understand their responsibilities.

#### Council's response:

As stated at 1(d) above, there is a range of support available to vulnerable tenants, and close working between the Council's Enforcement and Housing Options teams should prevent tenants facing eviction as a result of enforcement action becoming homeless. The licensing proposals seek to address poor management and conditions so that there are fewer tenants living in

unacceptable conditions and more tenants who are satisfied with their accommodation and want to stay put.

The Enforcement team and dedicated ASB Officers can provide advice to landlords and tenants on their responsibilities. The Council will look to provide more training and information to landlords and tenants, such as the new Key to Your Home tenant training courses that were launched late in 2015 and are becoming increasingly well attended.

b. Anti-Social Behaviour: Clarity was required on how quickly the Council would respond to anti-social behaviour more effectively once the scheme had been implemented and whether this would include taking action against tenants with rent arrears. Clarity is also sought on 'waste management' responsibilities and whether the Council can offer landlords additional support when tenancies are due to come to an end.

#### Council's response:

The introduction of licensing will mean a dedicated ASB Officer will be employed to work in the proposed area. Their role will be to respond and deal with ASB reports as well as assisting landlords in dealing effectively with problematic tenants.

From experience, we have seen more positive outcomes where good working relationships have been developed. Having a dedicated ASB Officer will set the foundations for developing a strong partnership with the local Police.

The Local Authority is not authorised to take action against tenants in privately rented properties for non-payment of rent – in law that is a civil matter between landlords and their tenants.

Fly tipping is a common issue and the Council has measures in place to assist landlords. The Council currently provides euro bins for HMOs as there is recognition that these types of properties generate larger volumes of refuse. One of the tasks assigned to the ASB Officer will be to ensure that fly tipping is removed quickly and they will work alongside the Enforcement Team to take action against perpetrators.

c. Tenant Referencing: Landlords felt that the tenant reference information they currently received was not very meaningful and would like details on the Council's proposals to support them in this area. Furthermore, could this be extended to the Council maintaining a tenant registration scheme to support landlords in dealing with nuisance tenants?

#### Council's response:

We appreciate that some landlords are making the effort to obtain tenant references and acknowledge that this information is not always useful. The Council are exploring options to provide a tenant referencing scheme to assist landlords in finding suitable tenants. This would focus on information from the Police on offending histories. The proposed approach is to make it quick and easy for tenants themselves to get a report based on Police records that landlords could require before granting a tenancy. This avoids data protection issues. It is not clear at this point when this new facility will become available.

The Council has developed a tenant training course called Key to your Home that tenants attend in three sessions over the course of three weeks. Tenants that have attended the course are given a certificate to prove their attendance and commitment, so this can also be used by landlords as evidence that tenants are committed to behaving responsibly. It is expected that the course will grow further in numbers attending and public profile over 2016.

d. **Immigration**: Reports in the media suggest that anti-social behaviour is caused by asylum seekers being placed in hotels. Clarity is required on the Council's plans to address this alleged problem and details on the support available to landlords to check immigration status for prospective tenants.

#### Council's response:

Blackpool Council has not consented to any contracts whereby the Home Office or its sub-contractors places asylum seekers into hotels. To the best of our knowledge, individuals who are in the process of making an asylum application

have not been housed within the Central area. There are no ASB issues caused in the Central area by asylum seekers.

Government have made it the landlord's responsibility to check on new tenants' immigration status; there is no further help with this that the local authority can offer.

#### 6. AOB

a. Stag and hen parties: Landlords and residents felt that other external factors were having a negative impact on the Central area of Blackpool, such as stag and hen parties and would like an understanding of how the Council proposes to deal with this issue.

#### Council's response:

Blackpool Council recognises there are external factors which have a negative impact within the Town Centre area, including the behaviour associated with stag and hen parties. Blackpool Council, in partnership with the Fire and Rescue, Police and North West Ambulance Service, are working to address issues relating to the night time economy.

The Local Authority is taking steps to attract more families to the Town Centre area and recent figures show an increase in visitor numbers. In an effort to tackle Anti-Social Behaviour (ASB) within the Town Centre, Blackpool Council has recently introduced (November 2015) a Town Centre and Promenade Public Space Protection Order. This gives the Police, and authorised officers, the ability to tackle issues such as street drinking and other ASB behaviour.

#### 3. Results from the Resident and Landlord Surveys

The results from the surveys that could be completed either directly on the Council's website or by submitting a paper questionnaire are as set out below. Please note that not all questions were mandatory and therefore results have been calculated on the response count for individual questions.

#### **Resident Survey**

1,141 questionnaires in total were completed by residents. To summarise, the survey shows the three main concerns residents have in their area are; i) rubbish dumping (39.7%), ii) no sense of community (31.7%), and iii) neglected/run down properties (30.7%). 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 unsafe and 5 being very safe. 13.7% of residents felt very unsafe, 16.7% of residents gave the rating of 2 and 28% rated the safety of their home and neighbourhood as 3.

The majority of residents had experienced issues with other privately rented properties and HMO's with the main issues being: fly tipping (61.8%), neglected/run down properties (45.8%) and loud noise (45%). The three main areas of concerns for residents when renting a property were; i) security (17.3%), ii) damp and mould (16%) and iii) energy efficiency (13.3%)

53.7 % of residents felt that most landlords were not good and responsible. 96.1% of residents felt that the responsibility lied with landlords to ensure that properties were in a good condition. Anti-Social Behaviour (ASB) is a major concern and residents generally felt the Council were ineffective in dealing with these issues. 82.1% of residents felt that landlords should be responsible for dealing with nuisance and ASB caused by their tenant and visitors.

The results show that 82.8% residents would like landlords to demand references from prospective tenants. 38.9% of residents felt that people were leaving the area as a direct result of the issues outlined in the consultation. 64.7% of residents supported the introduction of Selective Licensing to the Central area, with 22.2% of residents opposing it.

#### <u>Landlord Survey</u>

267 landlords completed the survey. To summarise the results, the majority of landlords felt that poorly maintained and managed properties contributed to the decline of an area. The three areas which were deemed to be the most significant problems within the Central area of

Blackpool were; i) Anti-Social Behaviour (18.9%), ii) empty properties (15.8%) and iii) low rent levels (15.7%)

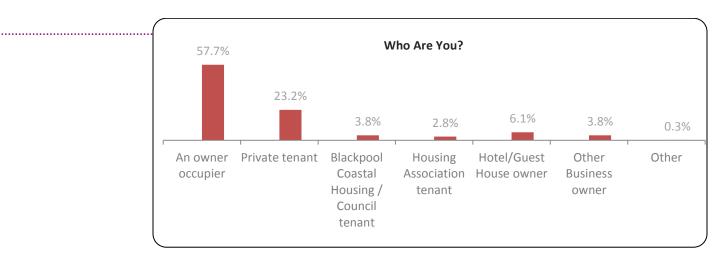
Currently 44.9% of landlords/agents were carrying out reference checks on prospective tenants; the majority (85%) felt that landlords/agents should have satisfactory procedures in place.

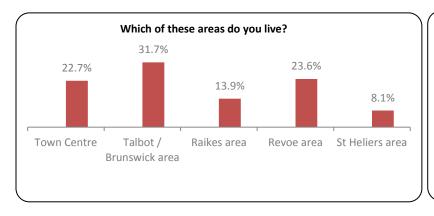
The three most problematic areas for landlords/agents are; i) tenants leaving without paying rent/giving correct notice (21.7%), ii) tenants building up high levels of rent arrears (20.7%) and iii) difficulties with finding tenants (12.9%). The issues which were of a least concern for landlords/agents were; i) tenants not staying because they were unhappy with the standard of the property (77%), ii) tenants not staying in a property because of the area (63.5%) and iii) tenants being the victims of Anti-Social Behaviour (54.5%).

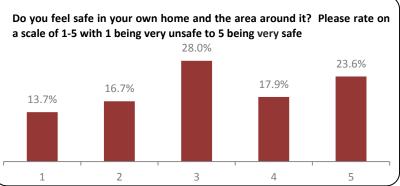
The results from the survey show that most landlords/agents felt that selective licensing would not address the issues currently linked to the Central area of Blackpool with 73.4% opposing the licensing scheme being introduced. However, 75.5% of respondents felt that Blackpool Council should intervene in areas suffering from high levels of Anti-Social Behaviour (ASB).

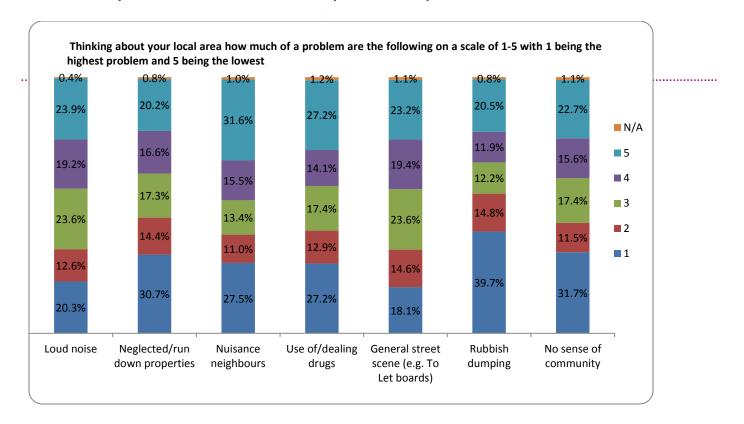
More detailed results from both surveys can be found below.

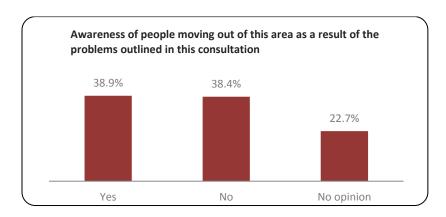
## **Resident Survey**

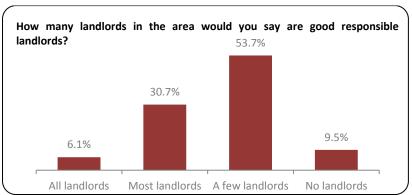


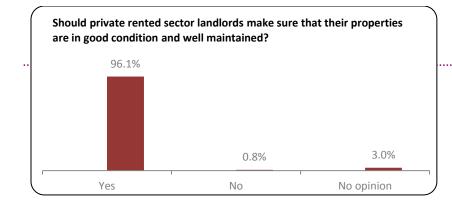


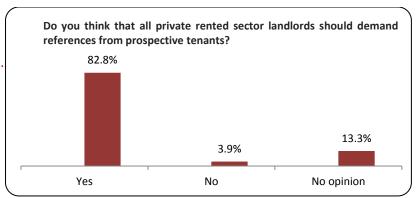


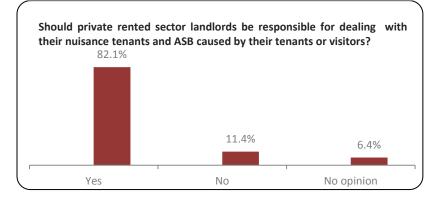


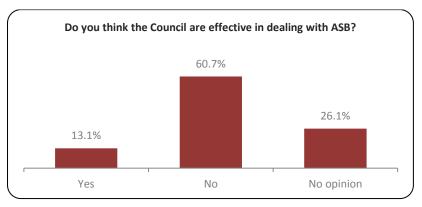


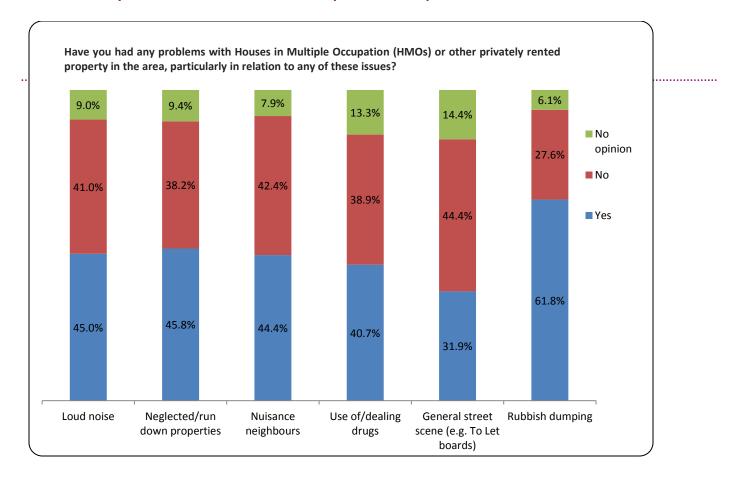


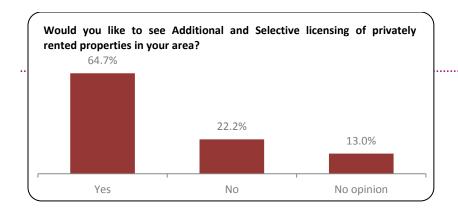


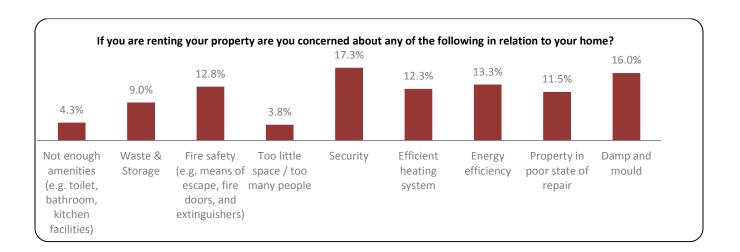












## **Landlord Survey**

