Consultation outcomes of the proposed Additional Licensing proposals across Bolton

Bolton Council

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1. Introduction

1.1 Bolton Council has undertaken a statutory public consultation on proposals to introduce an Additional Licensing scheme for Houses in Multiple Occupation (HMOs) across the borough. The proposed scheme would extend licensing requirements beyond larger HMOs to include smaller shared properties (occupied by 3–4 people) and certain converted buildings (Section 257 HMOs).

1.2 Additional licensing is a discretionary power under the Housing Act 2004, enabling local authorities to regulate smaller HMOs where there is evidence of poor property conditions or ineffective management. In Bolton, the proposed scheme would apply boroughwide and would cover two main types of property: smaller HMOs occupied by 3–4 people forming separate households and sharing facilities, and certain converted buildings where flats do not meet appropriate building standards and may present safety risks.

1.3 The overall aim of the scheme is to improve housing standards, ensure properties are well managed, and reduce issues such as poor conditions, overcrowding, and anti-social behaviour, thereby benefiting both tenants and the wider community.

1.4 Under Section 56 of the Housing Act 2004, local authorities are required to undertake a formal consultation before introducing an Additional Licensing designation. This consultation must be comprehensive, transparent, and last for a minimum of 10 weeks, ensuring that all persons likely to be affected by the proposals—including landlords, tenants, residents, businesses, and partner organisations—have a reasonable opportunity to express their views.

1.5 The consultation also aligns with broader legal and good practice requirements, including:

- Providing clear and balanced information about the proposals;
- Ensuring the process is accessible and inclusive;
- Demonstrating that feedback has been properly considered in decision-making; and
- Maintaining a clear audit trail to ensure the process is robust and defensible.

1.6 The consultation ran from February 9th to 19th April 2026 offering a range of ways for stakeholders to engage, including online surveys, events, and written submissions. This meets the statutory requirement to consult for at least 10 weeks.

1.7 This report has been prepared following the completion of the consultation period. It summarises the feedback received from consultees, identifies key themes and issues raised, and provides an overview of stakeholder views to inform the Council’s decision on whether to proceed with the proposed Additional Licensing scheme.

2. Consultation Delivery and Engagement

A comprehensive and multi-channel approach was adopted to ensure the consultation was widely accessible, inclusive, and effective in reaching all relevant stakeholders across the borough.

Consultation materials

2.1 A suite of consultation materials was developed to support engagement and ensure stakeholders could make informed responses. This included:

- A full consultation document setting out the evidence base, proposals, and detailed scheme design;
- A plain English tenant summary ("What this means for tenants");
- Supporting materials such as FAQs and guidance; and
- Materials were offered in accessible formats, including large print, translated versions, and easy-read formats.

Online and written engagement

2.2 All materials were published on the Council's website, alongside a dedicated online survey for stakeholders to provide feedback.

2.3 Stakeholders could respond via:

- Online survey
- Email submissions
- Postal responses
- Telephone support via a freephone number

2.4 Hard copies of documents were available at drop in events.

Events and direct engagement

2.5 A programme of engagement events was delivered to support participation and allow stakeholders to ask questions and provide feedback:

Drop-in events

- Three in-person drop-in sessions were held across the borough providing opportunities to view proposals, ask questions, and submit feedback. The events were held at:
- The Bridge Church, 109 Bradford Street, Bolton, BL2 1JX
- The Hub at Westhoughton, Central Drive, Westhoughton, Bolton, BL5 3DS
- The Hub, 100 Shepherds Cross Street, Bolton, BL1 3BS,

Virtual consultation events

- Sessions were tailored to different audiences:
  - Residents and tenants (2 sessions)
  - Landlords and managing agents (2 sessions)
  - Businesses, voluntary sector and partners (1 session)

Communication and publicity

2.6 A broad communications strategy was implemented to maximise awareness and participation:

- Direct email and mail-outs to all current HMO license holders and known landlords, I, letting agents, housing associations, and stakeholders;
- Social media campaign across Council channels, with regular posts throughout the consultation period;
- Press and newspaper advertising, including:
  - A formal public notice
  - Supporting articles
  - Ongoing promotion via the Council website and partner networks.

2.7 This multi-channel approach ensured that stakeholders could engage with the consultation in a way that suited them, supporting broad participation across different groups, including those less likely to engage digitally.

Consultees

2.8 The consultation sought views from a wide range of stakeholders likely to be affected by, or have an interest in, the proposed additional licensing scheme. This included:

- Landlords, including those known to the Council and current holders of mandatory HMO licences
- Tenants
- Letting and managing agents
- Local residents
- Local businesses
- Elected Members
- Community and voluntary sector organisations
- Relevant trade bodies, including the National Residential Landlords Association (NRLA)
- Adjacent local authorities
- The Greater Manchester Combined Authority (GMCA)

2.9 This approach ensured that the consultation captured a broad range of perspectives from across the private rented sector and the wider community.

Who responded (profile of respondents)

2.10 Three in-person drop-in events were held, which were attended by a total of **64 residents**. These sessions provided an opportunity for attendees to discuss the proposals directly with officers and ask questions.

2.11 An **online survey** was the primary mechanism for gathering structured feedback, which received a total of 175 responses were received via the online survey. Respondents were asked to identify their stakeholder group, and the breakdown is set out below:

- Owner-occupiers / residents: 117
- Private tenants: 21
- Landlords: 18
- Letting or managing agents: 3
- Public sector organisations: 3
- Councillors or elected Members: 2
- Voluntary or community organisations: 2
- Business owners or business representatives: 1
- Other: 8

  The other Category were as follows:

  - Bolton council tax payer
  - Chartered Surveyor based in Bolton inspecting HMO and rented properties
  - Work in Bolton
  - Bolton resident
  - Owner occupier but also private landlord
  - Private householder
  - Landlord letting to registered housing association
  - Landlord and Letting Agency Owners for House Shares

2.12 In addition, the Council received **10 written responses** submitted via email and post.2 from residents, 6 from landlords and agents, 1 from the GMCA and 1 from the NRLA

2.13 Engagement was also undertaken with elected Members. A meeting was held with a cross-party group of councillors, providing an opportunity for them to share their views, concerns and levels of support in relation to the proposed additional HMO licensing scheme.

2.14 A dedicated freephone line was made available throughout the consultation period, which received 12 calls, enabling residents and stakeholders to raise queries and provide feedback directly.

2.15 The majority of responses were received from owner-occupiers/residents, followed by private tenants and landlords. A smaller number of responses were received from other stakeholder groups, including agents, public sector bodies and community organisations.

3. Headline results

3.1 This section provides a summary of feedback from the online consultation survey on the proposed additional HMO licensing scheme. It focuses on the key findings from the quantitative results, highlighting overall levels of support, areas of agreement and disagreement, and perceived impacts.

3.2 A more detailed breakdown of the survey responses, including full results and supporting commentary, is provided in Appendix A.

In Summary

3.3 Overall, the survey demonstrates strong support in principle for the introduction of additional HMO licensing, with clear majorities backing the scheme, a boroughwide approach, and the inclusion of smaller HMOs and converted properties. This support is driven primarily by widespread concerns about poor property standards, weak management, and the impact of HMOs on neighbourhoods, particularly in relation to anti-social behaviour, waste, overcrowding and safety. Many respondents feel these issues are already visible and significant, and that stronger regulation is needed to improve accountability and living conditions.

3.4 However, this support is clearly conditional on effective implementation, with a consistent message that licensing will only be credible if it is properly enforced. There is low confidence in current enforcement arrangements, with many respondents describing them as under-resourced, reactive and inconsistent. As a result, respondents emphasise that any new scheme must be backed by sufficient staffing, proactive inspections and meaningful penalties, otherwise there is a risk it becomes a “tick-box” exercise without real impact.

3.5 At the same time, the findings highlight important tensions around proportionality, cost and housing supply. While many respondents support stronger regulation, there are concerns—particularly from landlords—that additional costs, stricter standards and licensing requirements could reduce the supply of shared housing and increase rents, with costs likely to be passed on to tenants. This raises particular concerns for low-income households and young people, who are most reliant on HMOs as a more affordable housing option.

3.6 Overall, the consultation suggests that while there is broad consensus on the need to raise standards and improve oversight, the success of the scheme will depend on striking the right balance between robust regulation and maintaining a viable, affordable housing market, supported by effective enforcement and a proportionate, evidence-led approach.

Question responses

Which of the following best describes you?

3.7 The majority of respondents identified as owner-occupiers or residents (66.9%), followed by private tenants (12.0%) and landlords (10.3%), with all other groups making up very small proportions.

3.8 This respondent profile is important in interpreting the results, as it means the findings are heavily shaped by the experiences of residents living near HMOs rather than those living in or operating them. The comments throughout the survey strongly reflect this, with frequent references to neighbourhood impacts such as waste, parking, anti-social behaviour and property condition. Many responses describe frustration with the visible effects of HMOs on residential streets, suggesting that perceptions of declining neighbourhood quality are a key driver behind support for stronger regulation.

Are you responding as an individual or on behalf of an organisation?

3.9 A significant majority of respondents (91.4%) were responding as individuals, with only 4.6% representing organisations and 4.0% indicating both.

3.10 This reinforces that the consultation largely captures personal views and lived experiences rather than formal organisational or professional positions. This is reflected in the qualitative responses, which are often detailed, emotive and based on direct encounters with HMOs, rather than technical or policy-based critiques. Many respondents describe specific local issues or personal experiences, indicating a strong level of community engagement with the topic.

Before this consultation, how familiar were you with HMO licensing?

3.11 Around 63.6% of respondents reported being either very familiar (24.4%) or fairly familiar (39.2%) with HMO licensing, while 36.4% had limited or no familiarity.

3.12 Although awareness is relatively high, the comments suggest that understanding is often shaped by local experience rather than formal knowledge. Many respondents refer to issues such as poor management, overcrowding and safety concerns, indicating that familiarity is driven by exposure to problems rather than knowledge of regulatory frameworks. This helps explain why many responses focus on outcomes (e.g. standards and enforcement) rather than the detail of how licensing operates.

Do you agree that Bolton Council should introduce an Additional Licensing Scheme for smaller HMOs?

3.13 There is very strong support for the proposal, with 78.3% strongly agreeing and a further 7.4% tending to agree, meaning 85.7% overall support. In contrast, 12.6% disagree and only 1.7% are neutral.

3.14 The strength of agreement reflects widespread concern about the current condition and management of HMOs. Comments repeatedly highlight poor standards, overcrowding and a perception that some landlords prioritise profit over tenant welfare. Respondents describe HMOs as “poorly managed” and in some cases providing an unacceptable standard of living. There is also a strong sense that licensing would introduce accountability, with several comments emphasising the need for landlords to be held responsible for tenant safety and the impact on neighbouring properties. However, those who disagree tend to argue that existing powers should already be sufficient if properly enforced, suggesting that the issue is not a lack of regulation but a lack of effective implementation.

How convincing do you find the evidence presented for introducing Additional Licensing?

3.15 A majority of respondents (72.6%) found the evidence very or fairly convincing, while 12.6% were neutral and 14.9% found it unconvincing.

3.16 The comments reveal a clear divide in how respondents interpret the evidence. Those who found it convincing often refer to direct experience of poor-quality HMOs, citing issues such as overcrowding, fire safety risks, waste problems and anti-social behaviour. Many feel that the problems are already visible and well understood, with some stating that there is “clear evidence” of poor standards. In contrast, those who were unconvinced tend to focus on the lack of detailed, localised evidence, particularly at ward level, and question whether existing enforcement powers have been fully utilised. Concerns are also raised about whether a boroughwide approach is justified and whether the evidence adequately considers potential impacts on housing supply and affordability.

Do you agree that the scheme should apply boroughwide rather than to selected areas only?

3.17 A large majority (86.4%) support a boroughwide scheme, compared to 10.8% who oppose it and 2.8% who are unsure.

3.18 Support for a boroughwide approach is strongly linked to concerns about displacement. Many respondents believe that if licensing is limited to specific areas, landlords will simply move into unregulated locations, with comments suggesting they would “move areas” or “cherry pick” less regulated neighbourhoods. There is also a strong emphasis on fairness and consistency, with respondents arguing that all residents and tenants should be subject to the same standards regardless of location. However, those opposed to a boroughwide scheme argue that it may be disproportionate and that licensing should instead be targeted at areas with clear evidence of persistent problems.

Do you agree that the scheme should include HMOs with 3–4 occupants sharing facilities?

3.19 A clear majority (82.9%) support including smaller HMOs, while 12.6% oppose and 4.6% are unsure.

3.20 The comments show strong support for a consistent approach, with many respondents stating that “a HMO is a HMO” regardless of size. There is a widespread belief that smaller HMOs can still present significant issues, particularly in terms of overcrowding, waste and parking. Several respondents also suggest that landlords may deliberately operate below existing thresholds to avoid regulation, meaning smaller HMOs are currently “under the radar.” However, those opposed raise concerns about proportionality and viability, arguing that smaller HMOs may not pose the same risks and that additional costs could reduce affordability or discourage supply.

Do you agree that certain converted buildings (Section 257 HMOs) should also be included?

3.21 Three-quarters of respondents (75.0%) support inclusion, while 11.4% oppose and 13.6% are unsure.

3.22 Support is largely driven by a desire for consistency and to avoid loopholes, with many respondents arguing that all HMOs should be regulated in the same way regardless of building type. Comments also highlight concerns about safety in converted buildings, particularly where they were not originally designed for multiple occupation. However, some respondents argue that these properties are already subject to existing regulations and that additional licensing may duplicate requirements and discourage investment.

Overall, do you agree with the proposed licence conditions?

3.23 There is strong support for the proposed conditions, with 86.4% agreeing (73.3% strongly and 13.1% tending to agree), compared to 9.1% who disagree.

3.24 The comments suggest this support is driven by lived experience of issues such as waste, anti-social behaviour and poor management. Many respondents describe negative impacts on their quality of life, including noise, fly-tipping and feeling unsafe in their neighbourhoods. There is strong support for holding landlords accountable not only for property condition but also for tenant behaviour. However, there are concerns about whether the Council has sufficient resources to enforce the conditions effectively, with many emphasising that the success of the scheme will depend on enforcement rather than the conditions themselves.

Do you think the proposed property standards are appropriate?

3.25 Half of respondents (50.3%) consider the standards appropriate, while a significant proportion (33.3%) believe they are not strict enough. Only 7.0% feel they are too strict, with 9.4% unsure.

3.26 The comments indicate stronger concern about under-regulation than over-regulation. Many respondents highlight issues with overcrowding and small room sizes, describing some properties as “cramped” or “shoe boxes,” and linking this to poor mental health and living conditions. However, there is also a clear counterpoint from landlords and managing agents, who argue that standards should be flexible, proportionate and aligned with national guidance. Concerns are also raised about the potential for new standards to be applied retrospectively, which could affect viability and investment.

Which areas of the proposed standards do you think are most important?

3.27 The most commonly selected issues were management of anti-social behaviour (62.6%), overcrowding and room sizes (50.0%), and property condition and repairs (49.4%), followed by waste management (34.5%) and fire safety (32.2%).

3.28 These priorities reflect the issues that respondents most directly experience in their day-to-day lives. The emphasis on anti-social behaviour, waste and overcrowding aligns closely with the concerns raised throughout the comments, suggesting that the perceived impact of HMOs on neighbourhoods is a key driver of support for regulation. In contrast, fewer respondents prioritised tenant rights, indicating that the focus is more on visible and immediate impacts rather than formal protections.

The proposed licence fee is £1,211 per property. Do you think this is reasonable?

3.29 Views on the proposed fee are mixed. Around 30.7% of respondents consider the fee reasonable, while 47.2% believe it is too low and 11.9% think it is too high. A further 10.2% are unsure.

3.30 The comments highlight a clear divide in perspective. A large proportion of respondents argue the fee is too low, often on the basis that HMOs generate significant rental income and that landlords should contribute more to ensure effective regulation and enforcement. Some suggest the fee should be higher or linked to the number of tenants or rental income, with a view that it should deter poor landlords and reflect the cost of managing the scheme. In contrast, those who consider the fee too high—primarily landlords—raise concerns about affordability and viability, particularly for smaller HMOs. A consistent concern across comments is that any increase in costs is likely to be passed on to tenants through higher rents, highlighting a tension between funding enforcement and maintaining affordability.

The HMO additional licensing fee is split into two payments. How fair do you think this split is?

3.31 Just over half of respondents (51.4%) consider the split fee fair or very fair, while 19.4% view it as unfair or very unfair. A further 16.0% are neutral and 13.1% are unsure.

3.32 Support for the split fee is generally based on the principle that it encourages serious applications and reflects the administrative work involved in processing them. Many respondents suggest that requiring an upfront payment ensures landlords prepare properly before applying. However, concerns are raised about the financial risk associated with the non-refundable element, particularly if an application is refused. Some respondents argue this could be disproportionate and suggest a lower upfront fee or a structure more closely aligned to actual costs. There are also perceptions among some that the structure could appear revenue-driven, reinforcing the importance of transparency in how fees are calculated and applied.

Do you agree that licences should last for up to five years?

3.33 A majority of respondents (54.6%) do not agree with a five-year licence duration, compared to 32.2% who support it and 13.2% who are unsure.

3.34 The comments strongly indicate a preference for shorter licence periods, with many suggesting annual or 2–3 yearly reviews. This reflects concerns that property conditions, management practices and tenant behaviour can change significantly over time, and that a five-year period risks allowing standards to decline without sufficient oversight. Many respondents emphasise the need for regular inspections and the ability to intervene quickly where issues arise. While those supporting a five-year term often cite administrative simplicity and stability, even these responses frequently acknowledge the need for ongoing monitoring, suggesting that enforcement and inspection frequency are seen as more important than licence length alone.

Do you agree that existing enforcement powers alone are not sufficient to address issues in smaller HMOs?

3.35 A strong majority (79.4%) agree that existing enforcement powers are not sufficient, while 10.9% disagree and 9.7% are unsure.

3.36 The qualitative responses reveal low confidence in current enforcement. Many respondents describe enforcement as weak, inconsistent or reactive, with frequent references to unresolved complaints and limited follow-up action. There is a perception that problems persist because of under-resourcing and a lack of proactive inspection, with some stating that authorities appear “powerless” or unable to act effectively. However, a minority argue that the issue is not the lack of powers but their application, suggesting that existing legislation could be effective if used more consistently and robustly. Overall, the findings point to a strong expectation that any new scheme must be supported by visible and effective enforcement.

Which alternatives or complements to licensing do you think would be effective?

3.37 The most commonly selected option was stronger enforcement only (73.5%), followed by targeted licensing (25.3%) and voluntary accreditation (21.2%). Very few respondents supported financial incentives or grants (8.2%) or doing nothing (3.5%).

3.38 The responses reinforce a clear message that enforcement is seen as the most critical factor. Many respondents emphasise that any approach—whether licensing or otherwise—will only be effective if it is properly enforced. There is strong scepticism about voluntary accreditation schemes, which are often described as ineffective or “tick-box” exercises. Similarly, there is very limited support for financial incentives, with many respondents arguing that landlords should not receive public funding for what is seen as a profitable activity. Overall, the comments suggest that respondents favour regulatory approaches backed by strong enforcement rather than voluntary or incentive-based measures.

What impact do you think the proposed scheme would have on tenants?

3.39 Most respondents (69.1%) believe the scheme would have a positive impact on tenants, including 37.1% who expect a very positive impact. However, 15.4% expect no real impact and 15.4% anticipate a negative impact.

3.40 Positive expectations are largely linked to improved safety, better living conditions and increased landlord accountability. Many respondents believe licensing will ensure tenants have access to safer, better-maintained accommodation and provide a mechanism for raising concerns. However, there is a strong counter-theme around affordability. Many respondents warn that increased costs will be passed on to tenants through higher rents, potentially reducing access to shared housing, particularly for lower-income groups. There is also some scepticism about whether licensing alone will be sufficient to address underlying issues if enforcement remains weak.

What impact do you think the proposed scheme would have on landlords and managing agents?

3.41 Responses are more evenly balanced, with 50.9% expecting a positive impact, 31.4% a negative impact, and 17.7% no real impact.

3.42 Many respondents believe the scheme will raise standards and professionalism, particularly by forcing poor landlords to improve or exit the market. There is a strong view that responsible landlords already meet appropriate standards and will not be significantly affected. However, concerns are raised about increased costs, administrative burden and regulatory complexity. Some respondents suggest that these pressures may lead landlords to increase rents, reduce investment or leave the market altogether. There is also concern that compliant landlords may be unfairly penalised alongside poorer operators.

What impact do you think the proposed scheme would have on local businesses or the wider local economy?

3.43 Just over half of respondents (51.7%) expect a positive impact, while 21.6% expect no real impact and 19.9% anticipate a negative impact.

3.44 Positive impacts are generally linked to improved neighbourhood conditions, with respondents suggesting that better-managed HMOs could lead to increased confidence in local areas, attract residents and support local businesses. Some also highlight the role of HMOs in housing working people who contribute to the local economy. However, negative expectations focus on rising rents and reduced housing supply, which could limit disposable income and reduce local spending. There are also concerns that increased regulation could deter investment and lead to landlords exiting the market.

Do you think the proposals could have a different impact on specific groups?

3.45 Respondents most frequently identified people on low incomes (42.6%), young people (36.1%), and small landlords (31.0%) as groups likely to be most affected.

3.46 The comments highlight concerns that increased costs will disproportionately affect those reliant on shared housing, particularly low-income households and younger people. Many respondents suggest that rent increases could reduce affordability and access to housing, potentially increasing pressure on homelessness services. At the same time, some respondents note that improved standards could benefit vulnerable groups, particularly those at risk of poor housing conditions. There are also concerns about the impact on small landlords, with suggestions that increased regulation may drive them out of the market, potentially leading to consolidation among larger landlords. Overall, the findings highlight a key tension between improving standards and maintaining affordability and supply.

4. Differences between stakeholder groups

4.1 The following section presents a breakdown of consultation feedback by key respondent groups, including owner-occupiers, tenants, elected members, landlords and managing agents (including representative bodies such as the NRLA), businesses, and individual responses from the Greater Manchester Combined Authority (GMCA).

4.2 Analysing responses in this way is important in the context of an additional licensing consultation, as different groups experience and interact with the HMO sector in fundamentally different ways. Residents and tenants are more likely to focus on living conditions, safety and neighbourhood impacts, while landlords and managing agents provide insight into operational, financial and regulatory implications. Elected members and public sector stakeholders bring a strategic and place-based perspective, and businesses and regional bodies such as GMCA can highlight wider economic and policy considerations.

4.3 Disaggregating the feedback therefore allows for a more balanced and nuanced understanding of the potential impacts of the proposed scheme. It helps to identify where there is alignment across groups, where views diverge, and where particular concerns may need to be addressed through scheme design, implementation or mitigation. This is particularly important for additional licensing, where achieving the right balance between improving standards, ensuring effective enforcement, and maintaining a viable housing market is critical.

Residents

4.4 Feedback from owner-occupiers / residents formed the largest proportion of responses (66.9%, 117 respondents) and is therefore highly reflective of the overall findings from the online survey. As a result, the themes expressed by this group closely mirror the headline results across all questions, particularly the strong support for additional licensing and concerns about the impact of HMOs on neighbourhoods.

4.5 Overall, owner-occupiers showed very strong support for the introduction of additional licensing, with the majority aligning with the overall survey result where 85.7% either strongly agreed or tended to agree with the scheme. This support was driven by consistent concerns about poor property standards, weak management and the impact of HMOs on local communities. Many residents referred to direct experience of living near HMOs, describing issues such as anti-social behaviour, waste, parking pressures and poorly maintained properties, which they felt justified stronger regulation.

4.6 There was also clear support among owner-occupiers for a boroughwide approach, again reflecting the overall finding where 86.4% supported boroughwide implementation. Residents frequently expressed concern that a targeted scheme would simply displace problems into other areas, with HMOs described as increasingly “spreading” beyond traditional locations. This group strongly emphasised fairness and consistency, arguing that all communities should be protected equally and that standards should not vary by area.

4.7 Similarly, owner-occupiers broadly supported the inclusion of smaller HMOs (3–4 occupants) and converted properties, in line with overall results (82.9% and 75.0% support respectively). The dominant view was that “a HMO is a HMO”, and that all shared housing should meet the same standards regardless of size. Many respondents felt smaller HMOs are currently under-regulated and can have significant impacts on neighbours, particularly in residential streets with limited space and parking.

4.8 A key theme throughout owner-occupier feedback was the impact of HMOs on neighbourhood character and quality of life. Respondents frequently raised concerns about the loss of family housing, transient populations, noise, and community cohesion, with some stating that HMOs are “changing” or “damaging” established communities. These concerns help explain the strong support for licensing conditions, where 86.4% agreed overall, particularly around waste management, anti-social behaviour and property standards.

4.9 At the same time, owner-occupiers strongly emphasised the need for effective enforcement, reflecting wider survey findings where 79.4% felt existing powers are insufficient and 73.5% supported stronger enforcement as an alternative or complement. Many respondents expressed frustration that current issues persist despite complaints, highlighting a perceived lack of resources, proactive inspection and follow-through. There was a clear message that licensing will only be credible if it is properly enforced and visible in practice.

4.10 While generally supportive, owner-occupiers also recognised potential trade-offs and risks, particularly in relation to housing supply and affordability. Some respondents acknowledged that increased regulation could lead to higher rents or reduced availability of shared housing, although these concerns were typically secondary to the desire to improve standards and reduce negative neighbourhood impacts.

4.11 Overall, the feedback from owner-occupiers reinforces the main survey findings, showing strong support for additional licensing, particularly as a tool to address poor standards and neighbourhood impacts. Given that this group represents the majority of respondents, their views provide a clear indication that public support for the scheme is closely tied to concerns about community impact, fairness, and the need for stronger and more consistent regulation of HMOs.

Tenants

4.12 Feedback from private tenants represents a much smaller proportion of the overall sample (12.0%, 21 respondents) and, unlike owner-occupiers, presents a more mixed and often polarised perspective on additional licensing. While some tenants supported the proposals, a notable proportion expressed strong opposition to HMOs more generally, which shapes how they view the scheme.

4.13 Overall, tenant responses were divided on the principle of additional licensing. While a number of tenants strongly agreed with introducing licensing—often citing the need to improve standards, safety and landlord accountability—others strongly disagreed, not because they opposed regulation, but because they opposed HMOs themselves. Comments such as “stop HMOs altogether” and “enough is enough” reflect a clear strand of opinion that the issue is not regulation, but the existence and growth of HMOs, particularly in residential and family areas.

4.14 Among those tenants who supported licensing, the reasoning closely aligned with wider survey findings. There was recognition that HMOs can be poorly managed, overcrowded and unsafe, with respondents highlighting issues such as waste, anti-social behaviour, parking pressures and poor living conditions. These respondents often supported a boroughwide scheme, noting that HMOs are “appearing everywhere” and that without boroughwide coverage, landlords would “just swap area.” There was also support for including smaller HMOs, with the view that standards should apply consistently regardless of size.

4.15 However, a significant proportion of tenant responses were strongly influenced by negative experiences of living near HMOs, particularly in areas such as Horwich. These respondents raised concerns about noise, disruption, infrastructure pressure (GPs, schools, parking), and the impact on property values and community cohesion. Several comments reflected a belief that HMOs are being developed in inappropriate locations, particularly within established residential neighbourhoods, leading to tension between tenants and existing residents.

4.16 A key theme across tenant responses—both supportive and critical—was the importance of enforcement. Many tenants selected “stronger enforcement only” as the most effective alternative or complement to licensing and expressed scepticism about whether licensing alone would make a difference. Comments such as “a licence will not stop any of the above” and “landlords will find ways around it” highlight a lack of confidence in current enforcement arrangements, mirroring wider survey findings. There was a clear expectation that any scheme must include proactive inspections, visible enforcement and meaningful penalties to be effective.

4.17 Tenants also raised strong concerns about affordability and supply, often more explicitly than other groups. Several respondents warned that licensing costs would be passed on through higher rents, potentially pricing people out of shared housing and increasing pressure on homelessness services. Others noted that HMOs provide an important source of lower-cost accommodation, particularly for those who cannot afford self-contained housing, and that reducing supply could have wider negative impacts.

4.18 Views on other elements of the scheme were similarly mixed. Some tenants supported stricter property standards, particularly around overcrowding and safety, while others questioned whether new standards would be effective or necessary given existing regulations. There were also calls for shorter licence durations, with some suggesting annual or more frequent reviews to ensure standards are maintained.

4.19 Overall, tenant feedback highlights a more complex and divided perspective than other groups. While there is support for improving standards and protecting tenants, this is often accompanied by strong concerns about the wider role and impact of HMOs, particularly in residential communities. The feedback suggests that for tenants, the success of additional licensing will depend not only on raising standards, but also on how effectively it addresses enforcement, affordability and the broader impacts of HMO growth on neighbourhoods.

Landlord and managing Agents

4.20 Landlords and letting/managing agents accounted for 21 survey responses in total, comprising 18 landlords (10.3% of all respondents) and 3 letting or managing agents (1.7%). Their feedback is particularly important because it provides direct insight from those who would be responsible for applying for licences, meeting standards, paying fees and managing properties under the proposed scheme. Compared with the overall survey findings, this group was more divided and more cautious. Some supported additional licensing as a way to raise standards, but many raised detailed concerns about cost, proportionality, viability, retrospective standards, rent increases and the risk of discouraging good landlords.

4.21 There was support from some landlords and managing agents for the principle of additional licensing where it would improve standards and tackle poor practice. One landlord commented that “all HMOs should be kept to certain standards regardless of number of tenants”, adding that “fire doesn’t count the number of people in a building before igniting.” Another landlord with experience of larger licensed HMOs said that running an HMO “requires a much more professional approach” and that many smaller HMO landlords may not realise how much management is required. This respondent supported the principle that “3 or 4 occupants should enjoy the same living and safety standards” as people living in larger regulated HMOs. Similarly, a housing association supported additional licensing, stating that it would “raise standards, protect tenants, and create a level playing field for responsible landlords.”

4.22 Several landlord and agent responses also supported a boroughwide approach, particularly where this would provide consistency and avoid landlords moving activity into less regulated areas. One respondent said “all HMOs should be licensed irrelevant of area,” while another said “one rule should apply for all areas.” A housing Association also supported boroughwide coverage, describing it as important for “consistency and prevention of landlords cherry picking areas to operate where there will be less oversight and scrutiny.” However, this was not universal. Some landlords and agents argued that the scheme should be targeted at areas with clear evidence of problems, with one respondent stating that additional licensing should “only” apply where HMOs are highly concentrated, and another arguing that a boroughwide scheme risks penalising compliant landlords without clear ward-level evidence.

4.23 A strong and repeated concern was that the scheme could penalise responsible landlords alongside poor operators. One landlord said the Council should “go after the black market HMOs where conditions are shocking” rather than focus on landlords “who make effort.” Another said the Council should “stop believing all landlords are bad and therefore treating us all the same,” arguing that the Council should “root out the bad properties and deal with them.” This concern was echoed by professional respondents, one of whom warned that the Council risks “tarring all landlords with the same brush.” The message from this group is not necessarily opposition to higher standards, but a request that the scheme distinguishes between compliant landlords and those operating poorly or unlawfully.

4.24 Cost was one of the strongest themes in landlord and managing agent feedback. Many felt the proposed £1,211 licence fee was too high, especially for smaller HMOs. One landlord said the fee was “a staggering amount” and would “have to be put on to the rents,” meaning “tenants would suffer and struggle to afford the increase.” Another said the cost would make small HMOs “too expensive to run,” particularly for three-person properties where income is more limited once mortgage, council tax, water and energy bills are paid. Several respondents described the fee as disproportionate or revenue-driven, using phrases such as “cash cows,” “money making scheme,” “rip off” and “daylight robbery.” One managing agent argued that licence fees should “reflect the actual cost of administration and enforcement” and be “transparently justified.”

4.25 Linked to this was a strong concern about rent increases and reduced supply. Several landlords said additional costs would inevitably be passed on to tenants. One stated that introducing licensing would “just increase rents,” while another warned that increased regulation would “drive up cost and reduce the availability of rental housing.” A landlord with a four-room HMO said the property currently provides “high quality accommodation for people who would not be able to afford a property on their own,” but that the proposed licensing costs could mean they stop running it as an HMO, resulting in existing tenants being evicted. Another respondent said small HMOs may “disappear” or be converted to Airbnb, reducing the availability of lower-cost shared accommodation. This group repeatedly linked the proposals to risks for people on low incomes, young people and those reliant on shared housing.

4.26 There were also detailed comments about property standards, particularly room sizes, communal space and whether new standards should apply retrospectively. Some landlords supported higher standards, with one saying Bolton’s minimum bedroom sizes are “far too small” and that nobody should be living in rooms “like sardines.” However, a number of professional and managing agent responses argued that standards must be flexible and aligned with tenant demand. One detailed response from a professional HMO operator reported that, from a survey of over 500 of their shared housing tenants, 96% preferred larger bedrooms, ensuite facilities, a shared kitchen/diner and no separate communal lounge, while only 4% preferred smaller bedrooms, shared bathrooms and a separate lounge. They argued that professional tenants “value above all else their own personal space and privacy” and that requiring separate lounges could reduce quality by forcing landlords to remove ensuite provision, reduce room sizes or make schemes unviable.

4.27 This theme was repeated by other landlords and agents who asked the Council to align standards with national guidance and neighbouring authorities. One response asked the Council to “retain 7.5sqm[1] minimum as a baseline

[1] The national minimum sleeping room size for a licensed HMO is 6.51m² for one person aged 10 or over. The references in this report to 7.5m² do not describe the national statutory minimum standard. They reflect comments made through the consultation by landlords/professional respondents, who referred to retaining a 7.5m² minimum as a baseline. The consultation findings therefore report the figure as part of the feedback received, but the Council recognises that the relevant national minimum standard is 6.51m² for single adult occupation.

standard," recognise "ensuite-led, larger bedroom models" and accept shared kitchen/diner spaces "where justified." Another argued that it would be "inherently unfair and impractical" if a room previously compliant under an HMO licence became non-compliant because the Council changed the room size requirement. These respondents were particularly concerned about retrospective changes, commercial viability and the possibility that good-quality accommodation could be lost because landlords are required to make expensive layout changes.

4.28 Enforcement was another important theme, but landlord views were nuanced. Some supported licensing because it would provide clearer standards and help improve accountability. A Housing Association said licensing could support "improved oversight and enforcement" and lead to "swifter resolution of any enforcement activity." A Housing Association said licensing would bring "accountability to a part of the rental market that has historically been under-regulated." However, other landlords argued that existing powers are already sufficient and that the Council should focus on using them better. One managing agent stated that the Housing Act 2004 already provides "robust enforcement tools" and that problems should be tackled through "targeted enforcement action against non-compliant landlords" rather than blanket regulation. Another landlord said "there is no enforcement I've seen or read about in Bolton," showing frustration not with the need for standards, but with the effectiveness of current action.

4.29 Landlords also raised concerns about how anti-social behaviour would be managed through licensing. Some felt landlords should take more responsibility, but others argued that tenant behaviour is not always within their control. One landlord said many issues are "as a direct result of the type of tenant" and that landlords may face complaints from neighbours even where they are trying to manage properties responsibly. Another said they had sought help from the Council and police when dealing with anti-social behaviour but felt "left to deal with the problem" alone. This suggests that if ASB forms part of licence conditions, landlords may need clear guidance on expectations, evidence thresholds, and support from enforcement partners.

4.30 The proposed fee split also generated concern. Some respondents accepted the principle of paying for administration, but several objected to the large non-refundable upfront element. One managing agent said a large non-refundable fee places "disproportionate financial risk on landlords," particularly where refusal may be due to technical or procedural issues. Another said the split "encourages the council to not grant applications" and makes the scheme look like it is designed to generate income. Others suggested a lower initial fee, a higher fee only on grant, or a more transparent structure linked to actual inspection and processing costs.

4.31 Views on licence duration were more mixed. Some landlords supported a five-year term because it provides certainty and makes costs more manageable. One respondent said landlords need certainty that rules are not subject to constant change and that five years gives balance. Another said a shorter licence period would impact housing supply and make more landlords exit. However, other landlord or housing provider responses favoured annual review or annual licensing linked to inspection, particularly where this would ensure standards are maintained. A Housing Association, for example, suggested the licence should be regranted annually based on adherence to conditions and inspection by environmental health and housing.

4.32 Overall, landlord and managing agent feedback is important because it does not simply reject the objective of improving standards. Many respondents support better regulation, tenant safety and action against rogue landlords. However, they strongly emphasise that the scheme must be fair, proportionate, transparent and commercially realistic. The clearest message from this group is that additional licensing should focus on poor standards and non-compliance, while avoiding unintended consequences such as rent increases, loss of good-quality shared accommodation, reduced investment, or responsible landlords leaving the market.

4.33 A number of written responses were also received. Overall, they supported improving HMO standards, especially at the lower end of the market, but argued that the scheme should be proportionate, flexible and evidence-led.

4.34 Main points raised:

- Tenant preferences: one submission said a tenant survey of over 500 shared-housing tenants found strong preference for larger private bedrooms, ensuite facilities, shared kitchen/diner space, and no separate communal lounge.
- Concern about communal lounge requirements: respondents argued that separate lounges should not be mandatory where rooms are larger, mostly ensuite, and there is a suitable shared kitchen/diner.
- Support for a flexible standard: they suggested keeping 7.5sqm[2] as a baseline minimum, but introducing a secondary standard for higher-quality HMOs with larger rooms, ensuite provision and kitchen/diner layouts.
- Commercial viability: submissions warned that requiring larger bedrooms, ensuite facilities and multiple separate communal spaces could make schemes unviable, reduce investment and leave poorer-quality stock in place.
- Retrospective changes: concern was raised that properties developed to a high standard under previous guidance could face disproportionate costs if forced to alter layouts.
- Licence fee: a fee breakdown submission set out a calculated total cost of £938.02, covering application handling, processing, draft licence preparation, issuing the licence, inspection and scheme supervision.

4.35 In short, the written submissions were not against regulation in principle, but asked the Council to avoid a “one-size-fits-all” approach and to recognise modern, higher-specification HMO models.

[2] The national minimum sleeping room size for a licensed HMO is 6.51m² for one person aged 10 or over. The references in this report to 7.5m² do not describe the national statutory minimum standard. They reflect comments made through the consultation by landlords/professional respondents, who referred to retaining a 7.5m² minimum as a baseline. The consultation findings therefore report the figure as part of the feedback received, but the Council recognises that the relevant national minimum standard is 6.51m² for single adult occupation.

4.36 The National Residential Landlords Association (NRLA) provided a clear and detailed response which was overall opposed to the introduction of additional licensing in Bolton, particularly in the form proposed.

4.37 At a strategic level, the NRLA argued that a borough-wide scheme is not justified by the evidence and should not be implemented. They highlighted that the Council's own data shows issues concentrated in specific wards (such as Halliwell, Farnworth and Great Lever), rather than across the whole borough, and therefore a blanket approach is disproportionate. They also rejected the argument that problems would be displaced into other areas, stating there is no clear evidence to support this claim and that market factors, such as house prices, make this unlikely.

4.38 A central theme in their response was that existing enforcement powers are sufficient but underused. The NRLA pointed out that the Council has tools under the Housing Act 2004 to address poor standards, but has made limited use of them, noting that no overcrowding notices or civil penalties had been issued in recent years. They argued that introducing additional licensing risks addressing under-enforcement with more regulation, rather than improving how existing powers are used.

4.39 The NRLA also raised strong concerns about costs and administrative burden, particularly the proposed licence fee of £1,211. They called for greater transparency on how the fee has been calculated and warned that additional licensing schemes can place disproportionate burdens on compliant landlords, while those operating illegally may continue to avoid regulation. They also suggested that increased costs could undermine the financial viability of renting and reduce housing supply, especially for smaller landlords.

4.40 In terms of the proposed licence conditions, the NRLA considered several to be overly onerous or impractical, particularly those relating to monthly inspections, waste management, and responsibilities that fall partly on tenants. They argued that some conditions risk being intrusive for tenants (for example, frequent inspections) or unenforceable in practice, and recommended amendments to ensure expectations are realistic and proportionate.

4.41 Finally, the NRLA suggested that alternative approaches would be more effective, including better use of existing enforcement powers, data-led targeting of rogue landlords, and implementation of the forthcoming PRS database before introducing additional regulatory layers. Overall, while they support the aim of improving standards, they concluded that additional licensing in its proposed form is not the most effective or proportionate way to achieve this

Business and public organisations

4.42 6 responses were received. Feedback from businesses, voluntary/community organisations and public sector respondents shows consistently strong support for additional licensing, although with some variation in emphasis around impacts, enforcement and wider housing concerns.

4.43 Across these groups, there was clear backing for the principle of licensing, with the majority strongly agreeing with its introduction and the remainder tending to agree. Respondents commonly described poor-quality HMOs as a “blight on areas,” highlighting concerns about unsafe conditions, inadequate standards and landlords prioritising profit over tenant welfare. For example, one community respondent stated that smaller HMOs are often “truly awful… landlords making a lot of money without the proper checks,” while a business respondent pointed to properties “not completed to regs” and attracting wider neighbourhood decline. Public sector respondents reinforced this, emphasising that all rented accommodation should be of a high standard and properly regulated.

4.44 There was also strong support for the scope of the scheme, particularly a boroughwide approach, with respondents consistently warning that a targeted scheme would lead to displacement into unregulated areas. Comments highlighted that HMOs are now appearing “in all areas of the borough,” and that excluding certain locations would simply “drive up the creation” of poor-quality accommodation elsewhere. Similarly, there was broad agreement that the scheme should include smaller HMOs and all property types, with repeated views that standards should apply “regardless of the number of people” or building type.

4.45 In terms of rationale, these groups strongly linked licensing to raising standards and improving accountability. Respondents frequently referred to landlords needing to take responsibility for tenant behaviour, property condition and compliance, with one noting that HMOs are often seen as an “easy way to make money… with no responsibilities.” There was also a clear expectation that licensing would help address anti-social behaviour, waste issues and poor property management, which were repeatedly identified as key concerns.

4.46 However, there were also important nuances within these responses. A strong theme—particularly from community respondents—was frustration with the existence and growth of HMOs more generally, with some expressing outright opposition and concerns about impacts on neighbourhood character, property values and quality of life. One respondent described HMOs as fundamentally unsuitable in family areas and called for limits or a complete halt to further development. Business respondents echoed some of these concerns, suggesting that concentrations of HMOs can “detract from the area” and calling for caps on numbers in specific locations.

4.47 On implementation, there was a consistent emphasis on enforcement as critical to success. Many respondents selected “stronger enforcement only” as the most effective complementary approach and highlighted that existing powers are not working in practice, with landlords “finding loopholes” or failing to meet requirements. There was a clear view that licensing must be supported by robust monitoring, meaningful penalties and proactive inspection, otherwise it risks being ineffective.

4.48 Views on costs and impacts were more mixed. Some respondents felt the proposed licence fee was appropriate or even necessary to deter poor landlords, while others suggested it may not be high enough to change behaviour. At the same time, there were concerns—particularly from business respondents—that costs may not deter all landlords and could have knock-on effects on rents and affordability, especially for more vulnerable groups.

4.49 In terms of impact, most respondents expected the scheme to have a positive or somewhat positive effect on tenants, improving safety and living conditions. There was also recognition that it would likely raise standards among landlords, particularly by targeting poorer operators. However, some respondents highlighted potential negative impacts on supply, affordability and specific groups, including low-income households and migrants, reflecting wider concerns about housing pressures.

4.50 Overall, feedback from these groups demonstrates strong support for additional licensing as a mechanism to raise standards and improve accountability, underpinned by clear concerns about current HMO conditions and management. However, it also highlights the importance of effective enforcement, careful implementation and consideration of wider housing market impacts, particularly in relation to supply, affordability and community cohesion.

Members

4.51 Members expressed broad support in principle for the introduction of additional licensing, particularly as a mechanism to improve standards and protect tenants, but their feedback highlighted a clear need to balance ambition with practicality and proportionality.

4.52 There was strong support for a boroughwide scheme, with members emphasising that anything less could lead to displacement of HMOs into unregulated areas and undermine the effectiveness of both licensing and the Article 4 Direction. They also supported the inclusion of smaller HMOs (3–4 occupants) and Section 257 converted flats, recognising that different property types present different challenges but should not fall outside regulatory oversight.

4.53 A key theme in the discussion was the need to raise living standards, particularly around room sizes and communal space, while recognising that this may have consequences. Members acknowledged that improving standards could result in a reduction in available bedspaces, increased costs, and a period of adjustment for landlords, particularly where properties need to be reconfigured. There was recognition that the scheme is not “one size fits all”, and that some flexibility and reasonable timescales for compliance would be important.

4.54 Members also raised concerns about the cumulative impact of regulation, including licensing fees, increased standards and the Article 4 Direction, particularly in terms of potential impacts on rents and housing supply. This led to a strong emphasis on the need for a robust Equality Impact Assessment, especially given the high number of vulnerable residents housed in HMOs, including those with mental health and support needs.

4.55 There was also a clear focus on fairness and consistency in the market. Members stressed that both large corporate landlords and smaller operators should be subject to the same standards and expectations, although it was acknowledged that larger landlords may be better able to absorb costs. Questions were also raised about the structure and level of fees, including whether they should be aligned with mandatory licensing in the future and regularly reviewed to ensure full cost recovery.

4.56 Finally, members recognised that while accreditation and support mechanisms could play a role, voluntary approaches alone are unlikely to drive change, reinforcing the need for mandatory standards. At the same time, there was interest in exploring whether the scheme could include additional support for landlords, such as training, alongside measures to recognise and promote good practice.

4.57 Two elected members responded to the online survey and were both strongly supportive of the introduction of additional licensing, with consistent views aligning closely with the wider consultation findings.

4.58 Both councillors strongly agreed with the introduction of the scheme and found the evidence very convincing, highlighting clear concerns about poorly managed HMOs, inadequate living conditions and anti-social behaviour. One respondent referred to HMOs that are “of a poor standard with inadequate amenities and unsafe living environments,” while the other emphasised that landlords are “not currently held to a high enough standard in terms of creating a safe and secure environment.” These responses reflect a shared view that existing arrangements are not delivering acceptable outcomes for tenants or communities.

4.59 There was also strong agreement on the scope of the scheme, with both members supporting a boroughwide approach to avoid displacement, noting that targeting specific areas would simply “move the problems… to another area rather than resolve them.” Both also supported the inclusion of smaller HMOs and converted buildings, with an emphasis that standards should apply regardless of property size or type, and that “everyone deserves a safe and secure home.” This reflects a clear focus on consistency and fairness in how the sector is regulated.

4.60 In terms of expected outcomes, both respondents identified clear benefits for tenants, landlords and communities, with anticipated improvements in living standards, safety and landlord accountability. One noted that tenants would “enjoy better living standards and know they have some protection,” while the other highlighted that licensing would require landlords to “take responsibility for their tenants” and could help address issues such as anti-social behaviour and poor management. There was also recognition of wider benefits, including improved neighbourhood conditions and the potential to attract residents and investment.

4.61 However, both members also raised important practical considerations, particularly around enforcement capacity and impacts on smaller landlords. One highlighted that enforcement teams are already “stretched to the max,” while both noted that smaller landlords may face financial challenges, suggesting the need for flexibility such as instalment payment options or additional time to comply. There was also support for complementary approaches, such as voluntary accreditation, although recognised that this would only be effective alongside mandatory licensing.

Greater Manchester Combined Authority (GMCA)

4.62 A response was received from the Greater Manchester Combined Authority (GMCA), although it did not include detailed commentary on the specific design or operation of the proposed scheme.

4.63 GMCA's position is therefore best understood in the context of its wider strategic priorities. At a city-region level, GMCA supports the use of licensing to improve standards within the private rented sector, promote better management practices, and ensure safer, higher quality accommodation.

4.64 The proposed additional licensing scheme is consistent with this strategic approach, aligning with GMCA's broader objectives to raise housing standards, support tenant wellbeing, and encourage greater consistency in regulation across Greater Manchester.

4.65 Overall, while no detailed scheme-specific amendments were proposed, GMCA's response indicates broad strategic alignment with the direction of the Council's proposals.

5. Equality Impact Assessment

5.1 The consultation responses highlight a number of potential equality impacts associated with the proposed additional licensing scheme, particularly in relation to affordability, housing supply, and access to accommodation for specific groups.

Impact on low-income households

5.2 A consistent theme across responses is the likelihood that increased licensing costs will be passed on to tenants through higher rents. Respondents frequently identified people on low incomes as the group most at risk, with concerns that reduced affordability could limit access to shared housing options. There is also a risk that reduced supply—if landlords exit the market or convert properties to alternative uses—could further constrain options for this group.

Impact on younger people

5.3 Younger people were commonly identified as being disproportionately affected, reflecting their reliance on HMOs as an entry point into the housing market. Any reduction in supply or increase in costs may limit access to affordable accommodation for young workers and those forming new households.

Impact on vulnerable groups

5.4 Several responses highlighted potential impacts on vulnerable households, including:

- people with disabilities or long-term health conditions
- migrants or individuals with limited English
- some ethnic minority communities

5.5 These groups are more likely to access lower-cost shared housing and may therefore be more exposed to changes in affordability or availability. At the same time, improved regulation and standards could deliver positive impacts in terms of safety, housing quality, and protection from poor management.

Impact on small landlords

5.6 While not a protected characteristic, there is a clear distributional impact on small-scale landlords, who were frequently identified as being more sensitive to increased costs and regulatory requirements. This may have indirect equality implications if their exit from the market reduces the availability of lower-cost accommodation.

Positive impacts relating to housing quality and safety

5.7 Notwithstanding the concerns above, there is also evidence that the scheme could have positive equality impacts. Improved licensing and enforcement were associated with:

- better property conditions
- enhanced fire and safety standards
- reduced overcrowding and anti-social behaviour

5.8 These improvements are likely to benefit tenants who are more vulnerable to poor housing conditions, including those in lower-income groups.

Overall Equality Balance

5.9 The consultation suggests a mixed equality impact:

- Potential negative impacts relate primarily to affordability and supply, particularly for low-income and younger households.
- Potential positive impacts relate to improved housing quality, safety, and tenant protection, which may disproportionately benefit vulnerable groups.

5.10 The overall impact will therefore depend on how the scheme is implemented, particularly in relation to:

- the level and structure of fees
- the effectiveness of enforcement (especially against non-compliant landlords)
- whether supply impacts can be mitigated

6. Amendments to the proposed scheme based on feedback

6.1 Based on the consultation feedback, the Council may wish to refine aspects of the scheme to better align with stakeholder concerns while still addressing the evidenced problems in the HMO sector. The points below focus on *targeted amendments or refinements*, rather than fundamental changes to the scheme's rationale.

Strengthening the enforcement model

6.2 A consistent theme in the feedback is scepticism about enforcement capacity. The proposed scheme emphasises licensing as a proactive tool, in contrast to the current reactive system, but is less explicit about how enforcement will scale.

6.3 The Council may wish to strengthen the scheme by clearly setting out:

- how additional resources will be secured and sustained
- how compliance will be monitored (e.g. inspection frequency, intelligence-led targeting)
- how non-compliance will be dealt with in practice

6.4 This would help address concerns that licensing could become administrative rather than outcome focused.

Fee structure and affordability impacts

6.5 The consultation highlights concerns about rents increasing and landlords passing on costs. The proposed scheme includes a fee structure but the narrative does not strongly address affordability impacts.

6.6 The Council may wish to consider:

- reviewing fee levels to ensure they are proportionate, particularly for smaller landlords
- introducing staged or risk-based fees (e.g. lower fees for accredited landlords or compliant properties)
- clearly demonstrating how fees relate to actual enforcement and administration costs

Proportionality of licence conditions

6.7 The scheme proposes a comprehensive set of licence conditions and property standards. While justified by evidence of poor conditions, feedback suggests concern about over-regulation.

6.8 The Council may wish to:

- review whether all proposed conditions are necessary for lower-risk HMOs

- distinguish between essential safety requirements and enhanced management expectations
- ensure that requirements are clearly aligned with national standards where possible

6.9 This would help ensure that compliant landlords are not unnecessarily burdened while still targeting poor practice.

Approach to good landlords

6.10 The consultation identifies concern that compliant landlords could be penalised alongside poor performers. The current proposal highlights benefits to good landlords but does not strongly differentiate their treatment.

6.11 The Council may consider introducing:

- incentives for accredited or demonstrably compliant landlords (e.g. reduced fees, longer licences)
- a lighter-touch approach to inspection for low-risk properties
- clearer communication about how the scheme supports, rather than penalises, good practice

6.12 This would reinforce the “level playing field” argument already set out in the proposal.

Managing impacts on supply

6.13 Feedback suggests concern that licensing could reduce HMO supply. The proposal recognises HMOs as an important source of affordable housing but does not fully address potential market impacts.

6.14 The Council may consider:

- monitoring supply impacts over time
- phasing implementation or allowing transitional arrangements
- engaging landlords early to reduce exit risk

6.15 This would help balance standards improvement with maintaining access to affordable accommodation.

Communication and implementation clarity

6.16 The consultation document emphasised engagement and accessibility, but feedback indicates a need for clearer ongoing communication.

6.17 The Council may wish to:

- provide detailed guidance for landlords on compliance expectations
- set out a clear implementation timetable and transitional arrangements
- establish ongoing engagement mechanisms with landlords and tenants

6.18 Strong communication will be critical to securing compliance and trust.

Overall

6.19 The proposed scheme is well evidenced and justified, particularly given the scale of complaints, hazards, and unregulated HMOs across the borough. However, the consultation feedback suggests that support is conditional on *how* the scheme is implemented.

6.20 In essence, the Council may wish to refine the scheme to be:

- more clearly enforcement-led
- more proportionate and risk-based
- more transparent in cost and operation
- more supportive of compliant landlords
- more explicit about managing affordability and supply impacts

6.21 These adjustments would not change the core direction of the scheme but would strengthen its deliverability and acceptability.

7. Conclusion and recommendation

7.1 The consultation provides a strong and consistent evidence base that there is both a clear need for intervention and broad support for the introduction of an Additional Licensing scheme. Across responses, there is a widely shared perception that parts of the HMO sector—particularly smaller and previously unlicensed properties—are associated with poor conditions, overcrowding, weak management and wider neighbourhood impacts. These issues are not seen as isolated but as ongoing and visible, affecting both tenant wellbeing and the quality of local areas.

7.2 At the same time, there is clear recognition that HMOs play an important and necessary role in the housing market, particularly for people who cannot afford self-contained accommodation. This creates an inherent tension within the findings: respondents want higher standards and stronger oversight but also recognise the importance of maintaining supply and affordability. The consultation therefore does not simply support more regulation; it supports better regulation that is effective, proportionate and targeted at the right issues.

Support for additional licensing

7.3 There is strong overall support for the principle of additional licensing. Many respondents view it as a necessary step to close existing regulatory gaps and ensure that all HMOs, regardless of size, are subject to consistent standards. The rationale underpinning this support is largely based on fairness and tenant protection, with a common view that the number of occupants should not determine whether a property is subject to oversight where risks such as fire safety, overcrowding and poor management remain relevant.

7.4 Support is also closely linked to the expectation that licensing will raise standards across the sector. Respondents frequently describe the scheme as a way to improve living conditions, increase accountability among landlords and provide reassurance to both tenants and local communities. There is also recognition that licensing could help create a more level playing field by preventing responsible landlords from being undercut by those operating substandard accommodation.

Conditional nature of support

7.5 Despite this overall support, the consultation makes it clear that backing for the scheme is conditional rather than absolute. The most significant issue raised is a lack of confidence in current enforcement. Many respondents feel that existing powers are not being fully utilised and that problems persist due to limited resources, reactive approaches and insufficient follow-up action. As a result, there is a strong and consistent message that additional licensing will only be effective if it is supported by visible, proactive and well-resourced enforcement.

7.6 There is also concern that without meaningful enforcement, the scheme risks becoming administrative rather than impactful. Respondents emphasise that simply requiring licences will not improve outcomes unless there is regular inspection, effective monitoring and the willingness to take action against non-compliance. This reflects a broader expectation that the scheme should deliver tangible improvements rather than operate as a procedural exercise.

Key concerns and risks

7.7 Alongside support for the principle of licensing, the consultation highlights a number of important risks that need to be carefully managed. One of the most prominent concerns is the potential impact on rents and affordability. Many respondents, particularly landlords and agents, expect that the costs associated with licensing will be passed on to tenants, which could make shared housing less accessible to those on lower incomes. This concern is reinforced by the recognition that HMOs are a key source of affordable accommodation within the borough.

7.8 There is also concern about the potential impact on housing supply. Some respondents suggest that additional costs and regulatory requirements could lead landlords to exit the market or reduce investment, particularly in smaller HMOs. This could have the unintended consequence of reducing the availability of shared housing and increasing pressure on other parts of the housing system.

7.9 A further issue relates to proportionality and fairness. While there is strong support for tackling poor standards, there is also concern that a blanket approach could disproportionately affect compliant landlords or those already providing good-quality accommodation. Some respondents argue that the scheme should focus more explicitly on poor practice and avoid imposing unnecessary burdens on those who are already meeting required standards.

Implications for implementation

7.10 The findings suggest that the success of the scheme will depend heavily on how it is designed and delivered. There is a clear expectation that the Council will take a balanced approach that combines strong regulation with fairness and transparency. This includes ensuring that fees are clearly justified, that standards are evidence-based and proportionate, and that any changes do not impose unreasonable retrospective requirements on existing properties.

7.11 There is also a need to ensure that the scheme aligns with wider housing and planning policies. Respondents highlight the importance of consistency, particularly in relation to national standards and neighbouring authorities, as well as the need to consider how licensing interacts with planning controls such as Article 4 directions. Effective coordination across these areas will be essential to avoid confusion and ensure that the overall regulatory framework is coherent and workable.

7.12 Crucially, there is a strong expectation that the Council will demonstrate its capacity to deliver the scheme effectively. This includes having sufficient resources to process applications, carry out inspections and enforce compliance, as well as providing clear guidance and communication to landlords and tenants. Without this, there is a risk that the scheme will not achieve its intended outcomes.

Final position

7.13 In conclusion, the consultation demonstrates a strong mandate for action to improve standards within the HMO sector. Additional licensing is widely seen as an appropriate and necessary tool to achieve this, but it is not a standalone solution. Its success will depend on the strength of enforcement, the fairness of its design and its alignment with the wider housing system.

7.14 If these elements are addressed, the scheme has the potential to deliver meaningful improvements in housing quality, tenant safety and neighbourhood conditions. The challenge for the Council is therefore to implement the scheme in a way that maximises its positive impacts while carefully managing the risks identified through the consultation.

Appendix A: Full online survey feedback

Q1. Which of the following best describes you?	Response percent	Response total
Private tenant	12.00%	21
Landlord	10.29%	18
Letting or managing agent	1.71%	3
Owner-occupier / resident	66.86%	117
Business owner or business representative	0.57%	1
Voluntary or community organisation	1.14%	2
Councillor or elected member	1.14%	2
Public sector organisation	1.71%	3
Other (please specify)	4.57%	8

Q2a. Are you responding as an individual or on behalf of an organisation?	Response percent	Response total
Individual	91.43%	160
Organisation	4.57%	8
Both	4.00%	7

Q3. Before this consultation, how familiar were you with HMO licensing?	Response percent	Response total
Very familiar	24.43%	43
Fairly familiar	39.20%	69
Heard of it but not in detail	26.70%	47
Not familiar at all	9.66%	17

Q4a. Do you agree that Bolton Council should introduce an Additional Licensing Scheme for smaller HMOs?	Response percent	Response total
Strongly agree	78.29%	137
Tend to agree	7.43%	13
Neither agree nor disagree	1.71%	3
Tend to disagree	2.86%	5
Strongly disagree	9.71%	17

Q5a. How convincing do you find the evidence presented for introducing Additional Licensing?	Response percent	Response total
Very convincing	44.00%	77
Fairly convincing	28.57%	50
Neither convincing nor unconvincing	12.57%	22
Not very convincing	6.86%	12
Not convincing at all	8.00%	14

A.1 Respondents were asked to comment on how convincing they found the evidence presented for introducing Additional Licensing. 58 respondents provided a written comment. Responses were mixed, with some agreeing that the evidence demonstrated a clear need for stronger regulation, while others felt the case for boroughwide additional licensing needed to be more robust or better targeted.

A.2 A strong theme was that many respondents felt there was already clear evidence of poor standards and poor management in some HMOs. Several respondents referred to direct experience of HMOs in their neighbourhoods, including concerns about overcrowding, fire safety, waste, parking, anti-social behaviour and poor property maintenance. One respondent stated that “it is clear there are poorly managed HMOs that do not provide a decent standard of living”, while another commented that “a lot of HMOs which house less than 6 people are truly awful, landlords making a lot of money without the proper checks”. Others felt licensing would provide clearer accountability, with one respondent saying that without accountability “people can just be exploited” and that “not all landlords have the tenants’ interest before profit”.

A.3 A number of comments were supportive of licensing because respondents felt smaller HMOs are currently able to operate with too little oversight. Some respondents felt the proposals would help to ensure HMOs are safe, well maintained and properly managed, and would provide residents with “somewhere to report concerns over the management of HMOs”. Several comments also stressed that landlords should be held to account for tenant safety and the impact their properties have on neighbouring residents. One respondent said HMOs “need to be regulated to ensure they are well maintained and the tenants have safe accommodation and the landlords are held to account for their tenants’ health and safety and the impact on neighbouring properties”.

A.4 Some respondents also felt the evidence was convincing because of the wider impact of HMOs on communities. Comments referred to pressure on local services, parking, bin storage, waste, road safety and local infrastructure. Horwich was specifically mentioned by one respondent, who said the area “cannot cope” with additional residents because of pressure on pharmacies, doctors, schools, play facilities, road safety, bus infrastructure and bin collection. Others argued that Bolton already has enough HMOs and that further growth would worsen existing pressures.

A.5 There were also comments that linked the need for licensing to the cumulative impact of HMOs on neighbourhoods. Respondents referred to the loss of family housing, the impact on surrounding properties and the perceived effect on community stability. One respondent said Bolton needs to ensure that where HMOs are provided, they are “to a good standard and safe”, properly managed, and that there is not an “oversupply creating a negative impact in communities and reducing the supply of family homes”.

A.6 Fire safety and wider safety standards were also raised as key reasons why stronger regulation was considered necessary. One respondent said “fire safety is very important”, although they also suggested that regulation should be proportionate and should not focus unnecessarily on good landlords where minor issues exist. Another respondent said landlords need to understand and follow rules on fire safety, gas and electrical safety and the Housing Health and Safety Rating System.

A.7 Several respondents supported the principle of licensing but emphasised that it must be supported by effective enforcement, staffing and inspection arrangements. Comments included that the Council needs to "make sure you have the right staff to complete the inspections and not be fooled by rogue landlords", and that HMOs should be treated "as a business" with rigorous standards. Others said that the scheme would only work if the rules are "properly policed" and if the Council has the manpower to implement additional licensing fairly and in a timely way.

A.8 A repeated concern was that existing Council enforcement and planning systems are not currently seen as effective enough. Some respondents said councillors and officers often state that the Council has limited powers or insufficient staff, and that existing problems with waste, parking and safety are not being resolved. One respondent described previous contact with environmental health as "a disgrace", although they said officers did eventually help with a clean-up. Others felt additional licensing could provide a more proactive framework for dealing with issues before they become entrenched.

A.9 However, a number of respondents did not find the evidence convincing, or felt the case for boroughwide licensing had not been fully made. Some argued that existing enforcement powers under the Housing Act 2004, planning powers and national housing standards should already be sufficient if used properly. One respondent stated that the evidence "does not demonstrate that existing enforcement powers under the Housing Act 2004 are insufficient" and does not provide "clear, ward-specific evidence of persistent or systemic failures" to justify a boroughwide scheme. This respondent argued that the issues could be addressed through "targeted enforcement action against non-compliant landlords" rather than "blanket regulation".

A.10 This view was echoed by several landlord or professional responses, which argued that the proposals risk penalising compliant landlords rather than focusing on the worst properties. One respondent said the proposals "impact landlords who already have high standards and comply with licensing and planning restrictions" rather than focusing on "problem areas at the bottom end of the market". Another said the Council risks "tarring all landlords with the same brush". These responses often supported action against poor landlords but questioned whether boroughwide additional licensing was the most proportionate approach.

A.11 Some comments also questioned whether the evidence presented was balanced enough. One respondent said there should be evidence for the "whole picture", including not only the benefits of licensing but also the potential drawbacks for affordable housing supply, responsible landlords and tenants who rely on HMOs as a lower-cost housing option. Another said there was "no option for partly convincing and partly not convincing", suggesting the survey did not allow respondents to express more nuanced views.

A.12 The potential impact on housing supply and affordability was another theme among those less convinced by the evidence. Some respondents were concerned that additional costs and requirements could make smaller HMOs too expensive to run, reduce the supply of lower-cost accommodation and contribute to rent increases. One landlord said smaller 3–4 person HMOs can provide quieter, more affordable accommodation than larger HMOs, and argued that additional licensing could make them unviable. Another response linked the proposals to wider pressures on landlords, including the Renters' Rights Bill, and warned that landlords may leave the market if additional costs and retrospective standards are imposed.

A.13 There were also concerns about the proposed fee and whether the scheme would be perceived as a revenue-generating exercise. One respondent said the scheme should be introduced for "the right reasons rather than as an extra revenue stream for the council", while another felt the proposed fee was too high. Conversely, another respondent felt the proposed licensing fee "is not enough" and should be linked to the income generated from the property.

A.14 Some respondents supported stronger regulation but wanted it introduced in a staged or more targeted way. One respondent suggested that the Council should first ensure compliance and raise standards across larger HMOs and introduce selective licensing for residential properties and 3- and 4-bedroom HMOs, before considering additional licensing for smaller HMOs after four to five years. Others suggested that a boroughwide approach may not be appropriate and that evidence should be more localised, for example by ward or by areas with higher concentrations of HMOs.

A.15 There were also comments that the relationship between licensing and planning should be clearer. Some respondents said no HMO should be authorised without a formal planning application and that any development before authorisation should lead to legal action and recovery of Council costs. Others wanted residents to have a right to comment on future HMO proposals, regardless of size. Several respondents specifically raised concern that licensing alone may not address issues such as parking, density and cumulative neighbourhood impact unless it is aligned with planning controls.

A.16 A small number of respondents felt that HMOs should be banned altogether or significantly restricted. These responses tended to reflect wider concerns about population growth, pressure on services and the changing character of neighbourhoods. Others accepted that HMOs have a role in the housing market but argued that they must be well managed and professionally operated.

A.17 **Overall, the comments suggest that many respondents found the case for intervention convincing because of concerns about poor standards, weak management, neighbourhood impacts and the limited oversight of smaller HMOs. However, the comments also show that some respondents wanted a stronger and more localised evidence base, clearer justification for a boroughwide scheme, assurance that existing powers are insufficient, and safeguards to ensure responsible landlords are not unfairly penalised. A recurring message was that licensing will only be credible if it is properly resourced, fairly enforced and targeted at improving standards rather than simply adding cost or bureaucracy.**

Q6a. Do you agree that the scheme should apply boroughwide rather than to selected areas only?	Response percent	Response total
Yes	86.36%	152
No	10.80%	19
Not sure	2.84%	5

A.18 Respondents were asked to explain whether they agreed that the additional licensing scheme should apply boroughwide rather than to selected areas only. 134 respondents provided a written comment. The majority of comments supported a boroughwide approach, although some respondents argued that licensing should be targeted only at areas with clear evidence of HMO-related issues, while others opposed the scheme in principle.

A.19 A strong theme among those supporting a boroughwide approach was fairness and consistency. Many respondents felt that all HMOs should be subject to the same standards, regardless of location. Comments included "all HMOs across Bolton should be equal", "fairness across the board", "one rule should apply for all areas", and "there should be no difference in housing standards wherever you live". Several respondents felt that applying the scheme only to selected areas would be unfair to communities excluded from the designation and could create confusion for landlords, tenants and residents.

A.20 A second major theme was the concern that a targeted scheme would simply displace HMO development into unlicensed areas. Respondents repeatedly said landlords and developers would "just move areas", "swap area" or "cherry pick" places with less oversight. One respondent said that if the scheme was not boroughwide, "would-be developers will just spread their attention to areas not covered", while another said selected areas would "just push/spread the problem". This was also linked to concerns about avoidance and loopholes, with some respondents arguing that a boroughwide approach would reduce opportunities for landlords to operate "under the radar".

A.21 Many respondents also argued that HMOs are no longer confined to a small number of locations. Comments suggested that HMO development is "happening all over the borough", "appearing everywhere" and "cropping up more frequently across the whole of Bolton". Some respondents stated that HMOs are now spreading beyond traditional areas close to town centres, with landlords buying properties "in all areas of the borough". On this basis, respondents felt a boroughwide designation would future-proof the scheme and ensure that all affected areas are included.

A.22 Several respondents specifically referred to Horwich and other areas where they felt HMOs were becoming concentrated. Some felt Horwich had "had more than enough" and that if only certain areas were licensed, this would simply shift pressure from Horwich to other wards. One respondent said Horwich "cannot cope" with more residents because of pressure on local infrastructure and services. Others referred to Farnworth and more affluent residential areas, arguing that HMOs can affect all types of neighbourhoods and should therefore be covered consistently.

A.23 A number of comments focused on the impact on residents and neighbourhoods. Respondents said HMOs can affect parking, waste, anti-social behaviour, community cohesion, pressure on local services and the value of neighbouring homes. Some said HMOs are "changing our communities", are "opening next to private homes" and can reduce the quality of life for owner-occupiers who have worked hard to buy their homes. For these respondents, a boroughwide scheme was seen as a way to provide consistent protection to all residents.

A.24 There was also a clear view from many respondents that all HMO tenants deserve the same level of protection. One respondent asked why Bolton Council would not want to "protect all their residents", arguing that all HMO tenants, wherever they live, should benefit from the additional protections licensing can bring. Others said "safety is safety" and that poor HMOs can exist in any part of the borough, including more affluent areas.

A.25 Some respondents linked boroughwide licensing to the need for clearer standards and easier enforcement. They argued that a single boroughwide approach would be easier to understand, easier to communicate and easier to monitor than different rules in different places. Comments included that "differing standards/licensing would create a monitoring challenge" and that boroughwide licensing would create a "level playing field". Others compared it to food hygiene regulation, arguing that all landlords should have to comply and all residents should have assurance that HMOs meet an acceptable standard.

A.26 Several comments supported boroughwide licensing because respondents felt it would help address poorly managed or unlicensed smaller HMOs. Some respondents referred to streets with both registered and suspected unlicensed HMOs, and argued that smaller HMOs can still have significant effects on neighbouring residents. Others said licensing would reduce legal loopholes and make it harder for landlords to avoid scrutiny by operating below current mandatory licensing thresholds.

A.27 However, not all respondents supported a boroughwide scheme. Some argued that additional licensing should only apply to areas where there is clear evidence of persistent HMO-related problems. One respondent stated that "a borough-wide scheme is not justified without clear, ward-specific evidence of persistent problems" and that licensing should be targeted only where there is "demonstrable, ongoing non-compliance" that cannot be addressed through existing enforcement powers. This view was echoed by others who said the Council's own evidence identifies particular problem areas, so it may not be proportionate to apply new standards across the whole borough.

A.28 Some landlord and professional responses raised concerns that boroughwide licensing could unfairly burden compliant landlords and increase costs for tenants. One respondent said their HMO was "high quality and looked after properly" and that licensing would be "yet another cost to landlords" likely to push rents up. Another argued that there are already delays in obtaining licences and that a boroughwide scheme could worsen the situation. There were also concerns that the scheme could reduce the availability of shared accommodation in some areas.

A.29 A smaller number of respondents opposed HMOs or additional licensing more generally. Some comments said HMOs should not exist at all, or that the Council should stop new HMOs rather than license them. Others said they did not agree with the scheme because it would increase rents or because they felt other approaches should be used to manage health and safety issues in smaller HMOs.

A.30 Some comments also highlighted the importance of linking licensing with planning controls. Respondents felt that applications should consider local context, parking, schools, doctors, dentists, neighbourhood character and the cumulative impact on communities. Some said each HMO should still be looked at individually, even within a boroughwide licensing scheme. Others felt that boroughwide licensing should sit alongside stronger planning controls and limits on the number of HMOs in any given area.

A.31 **Overall, the written responses show strong support for a boroughwide approach, mainly on the grounds of fairness, consistency, tenant protection and preventing displacement into unlicensed areas. Respondents commonly felt that HMOs are increasingly appearing across Bolton and that a selected-area approach would risk creating loopholes or moving problems elsewhere. However, some respondents wanted a more targeted, evidence-led approach and raised concerns about proportionality, costs, housing supply and the impact on compliant landlords.**

Q7a. Do you agree that the scheme should include HMOs with 3–4 occupants sharing facilities?	Response percent	Response total
Yes	82.86%	145
No	12.57%	22
Not sure	4.57%	8

A.32 Respondents were asked whether the scheme should include HMOs with **3–4 occupants** sharing facilities. 77 respondents provided a written comment. Most comments supported inclusion of smaller HMOs, with respondents commonly arguing that standards should apply to all HMOs regardless of size. However, some respondents raised concerns about proportionality, cost and whether smaller HMOs present the same level of risk as larger properties.

A.33 A dominant theme was that “a HMO is a HMO”, regardless of the number of occupants. Many respondents felt that all HMOs should be treated consistently and that the same basic standards should apply to all shared housing. Comments included “all HMOs should be treated the same”, “all HMOs should be covered”, “all HMO’s should have equal scrutiny” and “the number is irrelevant it should be all HMO’s”. Several respondents said that standards relating to fire safety, gas and electrical safety, room sizes, waste storage and shared facilities should not depend on whether a property houses three people or more.

A.34 A related theme was tenant protection. Respondents argued that every HMO resident deserves safe, secure and decent accommodation, regardless of property size. One respondent said “everyone should benefit whether there are 3 in a property or 7”, while another commented that “every occupant of an HMO deserves protection”. Others said the scheme would help protect tenants, landlords and the wider community by creating clearer expectations and a point of contact where there are concerns.

A.35 Many respondents were particularly concerned that smaller HMOs may currently operate below the radar. Comments suggested that 3–4 person HMOs can be poorly managed, overcrowded or lacking in adequate shared space and facilities. One respondent said “the smaller HMOs are possibly the biggest problem, potentially under the radar of the authorities”, while another argued that smaller properties have been “completely unregulated and unmanaged” despite often being located in smaller residential streets. Others said landlords may deliberately reduce property size or occupancy levels to avoid existing regulation, with one respondent stating that “developers have reduced their size/scope to avoid existing legislation”.

A.36 A number of comments focused on the impact of smaller HMOs on neighbouring residents and local communities. Respondents raised concerns about parking, rubbish, anti-social behaviour, poor maintenance and pressure on facilities. One respondent contrasted a family household with an HMO, noting that a family of 3–4 people may have one or two cars, whereas a 3–4 person HMO is more likely to have several adults, potentially creating “3–4 cars” or more if couples are present. Others said that even one or two tenants can cause nuisance and affect neighbours, particularly in terraced streets.

A.37 Some respondents felt smaller HMOs are often located in family housing areas and can have a disproportionate effect on settled communities. Comments referred to terraced housing, limited parking and small shared kitchens or bathrooms. One respondent said some smaller HMOs have “limited shared living space” and only small kitchen and bathroom areas. Another gave an example of a “2 bed terrace with 10 people living in it”, illustrating wider concerns about overcrowding and misuse of smaller properties.

A.38 Several respondents linked inclusion of 3–4 person HMOs to the need to prevent avoidance and loopholes. They argued that if smaller HMOs were excluded, landlords could deliberately operate just below the threshold for licensing. One respondent said that if they were not included, landlords may bring forward 3–4 occupant accommodation “to avoid licensing requirements”, leaving residents at risk where the landlord is rogue. Others said all properties used by more than one household and sharing facilities should be covered, rather than relying on narrow thresholds.

A.39 There were also calls for the scope to go even further. Some respondents said all rented properties should be registered or licensed, and some suggested that any landlord renting property, even to one tenant, should be subject to some form of regulation. Comments included “all landlords should be registered” and that the scheme should include “any properties with a tenant be it 1 or 8”. Other respondents focused specifically on all HMO properties, arguing that all should be licensed no matter their size or occupancy level.

A.40 However, not all respondents supported inclusion of 3–4 person HMOs. Some felt that smaller HMOs are lower risk and already adequately regulated under existing housing and safety legislation. One respondent argued that including them would “disproportionately impact compliant landlords, increase costs for tenants, and reduce the supply of affordable shared accommodation without clear evidence that additional licensing is necessary”. Another said there is “no more risk in a HMO with 3–4 occupants sharing than there is in a family dwelling with 3 or more occupants”.

A.41 Some landlord comments focused on viability and proportionality. One respondent said three-person HMOs should “definitely” not be included because there is “not enough income to justify that”, once mortgage, council tax, water and energy bills are taken into account, although they suggested that four-person HMOs “maybe” could be considered. Another respondent supported inclusion in principle but said the scheme must be “fair and proportionate”, especially where properties have already been developed to a high standard under previous guidance and meet the needs of working professional tenants.

A.42 There was also a minority view that the Council should first focus on larger HMOs or the worst-performing landlords. One respondent said their view was to “first sort our HMOs 5 bed and above”. Others said the issue is not necessarily the number of occupants but the suitability of the property and how well it is managed. This was reflected in comments such as “it’s not the amount of residents but the suitability”.

A.43 A smaller number of comments reflected general opposition to HMOs, rather than the specific threshold. Some respondents said there should be “no HMOs” or that numbers of HMOs should be limited. Others raised wider concerns about pressure on family housing, accommodation for local people, and the impact of shared housing on community cohesion.

A.44 **Overall, the comments show strong support for including HMOs with 3–4 occupants within the additional licensing scheme. The main reasons given were consistency, tenant safety, prevention of avoidance, and concern that smaller HMOs can still cause significant issues for tenants and neighbours. However, there were also concerns about proportionality, cost, affordability and the potential impact on responsible landlords, with some respondents arguing that smaller HMOs should only be included where there is clear evidence of risk or poor management.**

Q8a. Do you agree that certain converted buildings (Section 257 HMOs) should also be included?	Response percent	Response total
Yes	75.00%	132
No	11.36%	20
Not sure	13.64%	24

A.45 Respondents were asked whether certain converted buildings (Section 257 HMOs) should be included within the additional licensing scheme. 59 respondents provided a written comment. The majority of comments supported inclusion, often on the basis that all HMOs should be treated consistently regardless of building type. However, some respondents raised concerns about duplication of regulation, proportionality and the impact on investment.

A.46 A dominant theme was that all HMOs should be treated the same, regardless of how the building was originally constructed or converted. Many respondents used phrases such as “a HMO is a HMO”, “all HMOs should require full planning permission and be licensed”, and “include every single type of HMO – no exceptions”. There was a strong view that standards relating to safety, management and maintenance should apply consistently across all forms of shared housing. Comments such as “standards should apply to all” and “same structure should be in place regardless of the property type” reflected a desire for a clear and consistent regulatory approach.

A.47 A key reason for supporting inclusion was tenant safety and protection. Respondents highlighted concerns that converted buildings may not meet appropriate building standards, particularly where properties were not originally designed for multiple occupation. One respondent noted that “converted buildings without the correct building control compliance are more at risk”, while another said that older converted buildings can be “hard to keep to modern standards”, but that this does not mean tenants “deserve to be less safe and secure”. Others argued that tenants in these properties often have limited ability to influence maintenance and repair, making regulation particularly important.

A.48 Several respondents raised specific concerns about fire safety and building suitability, particularly in properties that have been converted from other uses such as family homes, shops or pubs. Comments emphasised that conversions must properly consider “fire and other safety concerns if the original building was not for the safety of persons sleeping overnight”. Others stressed that any building used as an HMO “no matter the size” should be regulated to ensure compliance with safety standards.

A.49 There was also concern that excluding converted buildings could create loopholes and inconsistencies. Respondents argued that if Section 257 HMOs were excluded, landlords might choose to operate in these types of properties to avoid licensing requirements. This links to wider concerns seen throughout the consultation about avoidance and the need for a comprehensive approach. Comments such as “it has to apply to all HMOs otherwise landlords will pick and choose properties that fall outside” were repeated in this context.

A.50 Some respondents supported inclusion because they felt it would help address poor standards and management in converted buildings. One respondent gave a detailed example of a converted property that was “unfit for residents”, with no water supply for washing facilities, poor management, drug dealing on site and high staff turnover. This type of experience was used to argue that stronger oversight and licensing are needed to ensure minimum standards are met and maintained.

A.51 There were also comments linking inclusion of converted buildings to wider neighbourhood impacts. Respondents referred to issues such as anti-social behaviour, poor maintenance, and the impact on neighbouring properties and communities. Some felt that converted buildings can contribute to these issues if not properly regulated, particularly where they are located within established residential areas.

A.52 However, not all respondents supported inclusion. Some argued that Section 257 HMOs are already subject to existing building standards, fire safety legislation and enforcement powers, and that including them within additional licensing would duplicate regulation. One respondent stated that this would place an “unnecessary burden on compliant property owners” and could discourage investment in converted buildings that “contribute positively to housing supply”.

A.53 A small number of respondents raised concerns about the impact on landlords and housing supply, particularly where converted buildings have already been developed to a high standard. One response highlighted that some converted properties, such as those with larger bedrooms or in-room facilities, may provide good quality accommodation and that additional requirements could reduce quality or viability if not applied proportionately.

A.54 There were also a minority of comments expressing broader opposition to HMOs or suggesting that certain types of buildings, such as listed buildings or environmentally sensitive areas, should not be used for HMOs at all. Others emphasised that planning controls should play a role, with comments suggesting that all HMO developments should require formal planning permission and that enforcement action should be taken where properties are converted without approval.

A.55 **Overall, the comments show strong support for including converted buildings within the additional licensing scheme, largely driven by a desire for consistency, safety and closing regulatory gaps. Respondents frequently emphasised that all HMOs, regardless of type, should meet the same standards and be subject to the same level of scrutiny. However, there were also concerns about proportionality, duplication of existing regulation and the potential impact on compliant landlords and housing supply, suggesting that any approach should be carefully designed to avoid unintended consequences.**

Q9a. Overall, do you agree with the proposed licence conditions (e.g. safety, management, waste, anti-social behaviour)?	Response percent	Response total
Strongly agree	73.30%	129
Tend to agree	13.07%	23
Neither agree nor disagree	4.55%	8
Tend to disagree	1.14%	2
Strongly disagree	7.95%	14

A.56 Respondents were asked to comment on the proposed licence conditions covering areas such as safety, property management, waste management and anti-social behaviour. 98 respondents provided a written response. Overall, there was broad support for the principle of these conditions, particularly where they would improve safety and hold landlords accountable. However, respondents also raised concerns about enforcement, proportionality, and whether the conditions would be effective in practice.

A.57 A strong and consistent theme was the need for greater accountability of landlords. Many respondents felt that landlords should take responsibility not only for the condition of their properties but also for the behaviour of their tenants. Comments included that “owners/landlords need to take responsibility when their tenants don't", particularly in relation to issues such as rubbish, fly-tipping and anti-social behaviour. Some respondents suggested that where tenants repeatedly cause problems, landlords should take action, including eviction, or risk losing their licence.

A.58 There was also widespread concern about the impact of HMOs on neighbouring residents and communities, particularly in relation to waste, anti-social behaviour and poor management. Respondents described issues such as "fly tipping, vermin and general nasty behaviour", "rubbish everywhere, loud music and no idea who owns the property", and "cars in the street multiply". Several respondents referred to personal experiences of living near HMOs, with one stating they had been "miserable due to the HMO near us", while another said they had "lived it – it was a nightmare" and had considered moving away.

A.59 Many respondents therefore supported the proposed conditions as a way to improve standards and protect both tenants and neighbours. Comments included that "raising housing standards and safety for residents is always a plus", that licensing would "help the safety, management, ASB and waste", and that it would provide "protection for all parties and the neighbourhood". Others emphasised that "everyone is entitled to expect to have a decent place to call home" and that "safety for tenants should be a requirement for all landlords".

A.60 A number of respondents highlighted the importance of safety measures, including fire safety, gas and electrical compliance and overall property condition. Some expressed surprise that such requirements were not already consistently enforced, with one respondent stating "I find it appalling that these restrictions are not already in place". Others stressed that multiple occupants increase risks, noting that "multiple occupants mean extra electrical devices/charges" and therefore require stricter oversight.

A.61 Waste management was repeatedly identified as a key issue, with respondents referring to overflowing bins, incorrect waste disposal and fly-tipping. One respondent described how an HMO was using a neighbour's bin in addition to its own, while others highlighted wider problems across the borough, stating that "waste disposal and fly tipping is a major problem within the Bolton Borough". Many felt that stronger conditions and enforcement could help address these issues.

A.62 Anti-social behaviour (ASB) was another major concern. Respondents linked HMOs to noise, nuisance, intimidation and wider community disruption. Some described incidents involving police attendance, groups congregating in streets and residents feeling unsafe. One respondent said that such situations could "frighten elderly neighbours to a point where they do not venture out". Others stressed that ASB needs to be addressed quickly, with suggestions such as introducing "good behaviour clauses" and ensuring issues are not left unresolved "for years".

A.63 There was also a strong emphasis on the need for effective enforcement and resourcing. Many respondents questioned whether the Council has the capacity to monitor and enforce the proposed conditions. Comments included "who is going to ensure there are no risks being taken at all times?" and concerns about whether the Council has sufficient staff and resources. Others said that standards must not only be set but "properly policed" and enforced in a timely manner.

A.64 Some respondents were supportive of the conditions but stressed the importance of a proportionate and practical approach. For example, one respondent said the Council should "go easy if the landlord is helpful" and not "nitpick about wall cupboards and a kitchen area being slightly too small", suggesting a need to focus on more serious risks rather than minor technical breaches. Another respondent said conditions should be "proportionate, evidence-led, and targeted only where clear failings have been demonstrated".

A.65 A number of landlord and professional responses raised concerns about fairness and the impact on compliant landlords. Some felt that responsible landlords who already meet high standards could be unfairly burdened, with one comment stating that the proposals risk "tarring all landlords with the same brush". Others questioned whether landlords should be held responsible for tenant behaviour that may be beyond their control, particularly in relation to anti-social behaviour.

A.66 There were also concerns about the effectiveness of licensing in addressing certain issues, particularly anti-social behaviour. One respondent stated that they "don't see how additional licensing could improve anti-social behaviour", noting that enforcement often depends on police and Council support. Another said that "a licence will not stop any of the above", suggesting scepticism about whether licensing alone can resolve underlying problems.

A.67 Some responses reflected broader concerns about housing pressures and community impacts, including overcrowding, pressure on services and changes to neighbourhood character. Others emphasised the need for wider strategies to improve the borough, with one respondent stating that Bolton "looks terrible everywhere" and that it is "time to address it".

A.68 Finally, a detailed response from a managing agent highlighted the importance of aligning conditions with tenant demand and market realities, particularly for working professionals. This response argued that tenants often prefer larger bedrooms, ensuite facilities and shared kitchen/diner spaces rather than traditional layouts with separate lounges. It cautioned that overly rigid standards could reduce the quality and viability of accommodation, discourage investment and fail to reflect how people actually live.

A.69 **Overall, the comments indicate strong support for the principle of licence conditions to improve safety, management and standards, particularly in response to concerns about poor-quality HMOs and their impact on communities. However, respondents emphasised that conditions must be effectively enforced, proportionate, and targeted, and that the Council must have sufficient resources to deliver the scheme. There were also concerns about fairness, the impact on responsible landlords, and whether licensing alone can address issues such as anti-social behaviour without wider support from enforcement agencies and other services.**

Q10a. Do you think the proposed property standards (e.g. room sizes, amenities, fire safety) are appropriate?	Response percent	Response total
Yes – appropriate	50.29%	86
Too strict	7.02%	12
Not strict enough	33.33%	57
Not sure	9.36%	16

A.70 Respondents were asked whether the proposed property standards, including **room sizes**, amenities and fire safety, were appropriate. 48 respondents provided a written comment. The comments were mixed. Many respondents supported stronger standards and felt they were necessary to prevent overcrowding and poor-quality accommodation. Others felt the proposed standards should be more flexible, proportionate and aligned with national standards and neighbouring authorities.

A.71 A strong theme was that minimum space standards are essential. Several respondents were concerned that some HMO rooms are too small and that landlords are "packing" or "cramming" people into properties to maximise income. Comments included that some HMOs "feel like shoe boxes", that landlords are "cramming more and more rooms into houses resulting in there being room for little more than a bed", and that people should not be living in "Dickensian conditions". One respondent said Bolton Council's current minimum bedroom standards are "far too small" and that "nobody should be living in a bedroom as small as 6.5m²".

A.72 A number of respondents linked room size and amenity standards to tenant wellbeing. Comments highlighted that living in cramped accommodation with limited amenities can affect mental health and make it harder for tenants to feel settled. One respondent said that "living in cramped limited space with a lack of amenities can impact mental health". Another commented that where rooms feel like "shoe boxes", residents may feel disconnected from the home and community and are more likely to move on rather than "setting down roots". Others referred to the physical and emotional impact of having only a bedroom, bathroom and small kitchen area, with little or no communal space.

A.73 Respondents also raised concerns about overcrowding and misuse of rooms. Some felt that sleeping rooms should be used only for that purpose and that minimum space per person should be clearly defined. One respondent said there must be a "sq.m minimum per person per sleeping room" and that dual-purpose rooms, other than a kitchen with attached dining area, should be prohibited. Others raised concerns that couples or families may be placed in accommodation too small for them.

A.74 Fire safety was also seen as a key issue. Respondents argued that where multiple people are living in a property, escape routes, electrical safety and fire precautions need careful attention. One comment stated: "Just look at your own home, if you overcrowd it, will the escape routes be suitable?" Another described overcrowding as "a disaster waiting to happen". Several comments therefore supported stricter standards as essential for tenant welfare and safety.

A.75 Some comments focused on external amenities and neighbourhood impacts. Respondents said standards should take account not only of internal room sizes but also gardens, parking and the wider effect on neighbouring properties. One respondent said “the room sizes should be greater, the external amenities need to be greater such as size of garden and parking” and that communal areas should also be larger. Others said poor property standards and overcrowding can have a knock-on effect on surrounding streets and property values.

A.76 There was also support for standards being used to address rogue landlords and poor-quality accommodation. One respondent said the focus should be on “rogue landlords” and gave examples of areas such as Derby Street, Deane Road, Halliwell Road and St Helens Road, where they believed there were flats above shops with “no licence or safety at all”. Others said unscrupulous landlords often “don’t care once they get permission” and that stronger standards are needed to prevent a “race to the bottom”.

A.77 Some respondents wanted standards to be more stringent. They argued that the proposals should go further to improve living conditions and prevent decline. Comments included that standards should be “strict for the benefit of the occupants”, “more stringent”, and “essential for tenant welfare and to prevent sub-standard accommodation”. One landlord respondent also supported higher standards, stating: “As a landlord myself, I want us all to be good not bad landlords.”

A.78 However, there was also a clear theme around proportionality and flexibility. Some respondents were concerned that the proposed standards could be too rigid, particularly in older properties or smaller dwellings. One comment questioned who decides “what space is enough” and what criteria are used to judge adequate living accommodation. Others argued that smaller accommodation may be cheaper to heat and maintain, and that some tenants may choose smaller rooms because they are more affordable.

A.79 Several landlord and professional responses argued that the standards should be aligned with national guidance and neighbouring authorities, rather than introducing additional local requirements. One response stated that many issues are already covered by “existing national space standards, Building Regulations, and fire safety legislation” and warned that additional or enhanced local standards could create “inconsistency, unnecessary cost, and duplication”. Another said space standards should be in line with Salford and Manchester “to ensure consistency and not retrospective”.

A.80 A particularly detailed landlord/managing agent response focused on the needs of working professional tenants. This response supported the Council’s objective of improving poorer-quality accommodation but argued that modern professional HMOs often work best with larger private bedrooms, ensuite facilities and shared kitchen/diner spaces, rather than smaller rooms with separate lounges. The respondent reported that a survey of over 500 of their shared housing tenants found that 96% preferred larger private bedrooms, ensuite facilities, a shared kitchen/diner and no separate communal lounge, while only 4% preferred smaller bedrooms, shared bathrooms and a separate lounge.

A.81 This response suggested retaining the 7.5sqm[3] minimum as a baseline, but introducing a more flexible standard for higher-quality accommodation where bedrooms exceed 10sqm for single occupants or 15sqm for couples, most rooms have ensuite facilities, and an appropriately sized shared kitchen/diner is provided. The respondent argued that requiring separate communal lounges in all cases may not reflect how working professional tenants actually live and could reduce the quality or viability of accommodation.

A.82 A number of respondents also raised concerns about retrospective application of new standards. Some argued it would be unfair to require landlords to alter properties that were previously approved and developed in line with earlier guidance. One respondent said it would be "inherently unfair and impractical" if a room that already has an HMO licence became non-compliant because the Council changed room size requirements. Others warned that costly retrospective works could lead landlords to exit the market, reducing supply and pushing up rents.

A.83 There were also concerns about commercial viability and housing supply. Some respondents felt that if standards require larger rooms, ensuite facilities and multiple communal spaces, schemes may become unviable. It was argued that this could discourage investment, slow refurbishment, reduce available accommodation and increase pressure on Council services. One respondent said that where landlords are required to modify existing layouts retrospectively, they may "exit the market", increasing the housing crisis and pushing rents up further.

A.84 A minority of respondents questioned whether standards for smaller HMOs are meaningfully different from family homes, with one comment stating: "I cannot see how this is any different to a family dwelling with 3-4 occupants." Another respondent argued that if someone is happy to live in a smaller room for a lower rent, they should be allowed to do so, provided fire safety is maintained.

A.85 **Overall, the comments show broad support for the principle of property standards that improve safety, prevent overcrowding and raise accommodation quality. Many respondents felt stronger standards are necessary to stop poor-quality HMOs, protect tenants and prevent people living in cramped or unsafe conditions. However, there was also a clear request for the Council to ensure standards are proportionate, evidence-based, non-duplicative, aligned with national and neighbouring authority standards, and flexible enough to recognise different models of good-quality HMO provision.**

[3] The national minimum sleeping room size for a licensed HMO is 6.51m² for one person aged 10 or over. The references in this report to 7.5m² do not describe the national statutory minimum standard. They reflect comments made through the consultation by landlords/professional respondents, who referred to retaining a 7.5m² minimum as a baseline. The consultation findings therefore report the figure as part of the feedback received, but the Council recognises that the relevant national minimum standard is 6.51m² for single adult occupation.

Q11. Which areas of the proposed standards do you think are most important? (Select up to three)	Response percent	Response total
Fire safety	32.18%	56
Gas and electrical safety	25.86%	45
Overcrowding and room sizes	50.00%	87
Property condition and repairs	49.43%	86
Waste management	34.48%	60
Management of anti-social behaviour	62.64%	109
Tenant information and rights	8.62%	15
Other (please specify)	16.67%	29

Q12a. The proposed licence fee is £1,211 per property. Do you think this is reasonable?	Response percent	Response total
Yes	30.68%	54
No – too high	11.93%	21
No – too low	47.16%	83
Not sure	10.23%	18

A.86 Respondents were asked whether the proposed licence fee of £1,211 per property was reasonable. 103 respondents provided a written comment. Views were mixed, although a significant number of comments argued that the fee should be higher, more frequent, or linked to the size or income of the HMO. Others felt the fee was too high, particularly for smaller HMOs and compliant landlords, and warned that costs could be passed on to tenants.

A.87 A strong theme among respondents who supported the fee, or felt it should be higher, was that the Council needs to recover the costs of operating, monitoring and enforcing the scheme. Comments included that "the council needs to recover its costs and manage these properties efficiently" and that there is a cost to the local authority in ensuring properties are managed properly, inspected and kept in suitable condition. Several respondents said the scheme should be self-financing so that inspections and enforcement are not dependent on wider Council budgets.

A.88 Many respondents felt the fee should be high enough to deter poor or opportunistic landlords. Comments included that the fee should "deter bad landlords", "weed out unscrupulous profiteers" and "sort the wheat from the chaff". Some respondents viewed HMOs as businesses generating significant rental income and argued that landlords should pay accordingly. One respondent stated that "if it is a business [it] should not be a problem", while another said serious landlords charging rent per room should be able to meet the cost.

A.89 A number of comments argued that the proposed fee was too low, particularly given the income that can be generated from HMOs. Respondents commented that £1,211 is "not even a month's rent", that landlords can make that amount "in a week", and that some rooms can be let for "over £800 a month per tenant". Some respondents suggested much higher fees, including £1,500 minimum, £4,000 per HMO occupant per year, £10,000, or £1,000 per letting room per annum. Others proposed a percentage-based approach, such as linking the fee to rental income, room numbers, property value or the number of occupants.

A.90 There was support for a sliding scale fee structure. Several respondents felt a flat fee per property may be unfair because HMOs vary in size and profitability. Suggestions included charging per room, per person, by floor area, by property value, by council tax band, or according to the number of tenants. One respondent suggested a base fee for small HMOs with an additional charge per extra tenant or resident. Another said the fee should relate to the number of rooms available to let, and also to the standard of the property at application, so poorer-quality properties that require more intervention pay more.

A.91 Some respondents argued that the fee should be annual rather than a one-off five-year charge. Comments included that it “should be a yearly charge definitely not a 5 year charge” and that annual renewal would ensure ongoing compliance rather than an “initial compliance tick-list”. Others suggested more frequent renewals, for example every two years, or an annual inspection attached to the fee. This linked to wider concerns that standards may deteriorate if inspections and licence reviews are too infrequent.

A.92 Another recurring theme was that higher fees could help ensure better landlord commitment and behaviour. Some respondents felt that a higher cost would make landlords think more carefully before converting properties into HMOs and would discourage poor-quality conversions. Comments included “make it higher so the people applying think twice”, “make it unaffordable”, and “make it too cheap and it’s worthless”. Others argued that a higher fee would help drive better landlord management and business standards.

A.93 However, a significant number of respondents felt the proposed fee was too high or disproportionate, especially for small HMOs. Some landlord and professional responses argued that the fee should only reflect the actual cost of administration and enforcement. One respondent described the fee as “excessive and not proportionate, particularly for smaller HMOs and compliant landlords”. Another said the Council should not use landlords as “cash cows”, while another called the proposed fee a “rip off” and a way for councils to generate additional revenue.

A.94 Several respondents compared the fee with other licensing costs or questioned how it had been calculated. One comment said the proposed amount was much higher than Salford, while another noted that a previous five-bed HMO licence was around £650 and involved one short officer visit. Others asked whether the fee was per property or per person, whether it was yearly or one-off, and whether it would apply regardless of property size. These comments indicate that some respondents wanted greater transparency on how the fee was derived and how it compares with other authorities.

A.95 A key concern was that the fee could be passed on to tenants through higher rents. Respondents warned that additional costs could increase rents and undermine affordability, particularly for people on low incomes. Comments included that “tenants would suffer and struggle to afford the increase”, “this will increase the rent to tenant”, and “wouldn’t like landlord to add fee onto rent”. Some suggested a lower fee, for example £500 or less, to reduce the risk of rent increases.

A.96 Landlord respondents also raised concerns about viability and investment. They referred to rising interest rates, utility costs, inflation and other pressures on the private rented sector. Some argued that higher costs leave landlords with less money to invest in property improvements and may make smaller 3–4 bed HMOs unviable. One respondent said the margins on 3–4 bed HMOs are “heavily squeezed” because landlords often include energy bills within rents, and costs should therefore be proportionate.

A.97 Some respondents distinguished between responsible and irresponsible landlords. They supported charging enough to fund enforcement but did not want compliant landlords to be penalised. One response said the “compliance of the licence is the important part” and that it should not be used to make money. Another suggested using fines or bonds for non-compliance rather than relying solely on an upfront licence fee. A few respondents proposed that bad landlords should face penalties, while good landlords should not be overburdened.

A.98 There were also comments linking the fee to asylum accommodation and Serco/Home Office contracts, with some respondents arguing that landlords receiving such income should pay more. These comments reflected wider concerns about perceived profits from accommodation contracts and the impact on local housing markets.

A.99 **Overall, the comments show no single consensus on the proposed £1,211 fee. Many respondents felt the fee was reasonable or too low because HMOs can generate significant income and the Council needs resources to inspect and enforce standards. They often wanted the fee to be higher, annual, or linked to room numbers, occupants or rental income. In contrast, landlord and professional respondents were more likely to argue that the fee was excessive, should be transparently cost-based, and could lead to higher rents, reduced viability and less investment. A recurring message was that the fee structure should be fair, proportionate, clearly justified and sufficient to support effective enforcement.**

Q13a. The HMO additional licensing fee is split into two payments: £760 on application (non-refundable) and £451 if the licence is granted. How fair do you think this split is?	Response percent	Response total
Very unfair	12.57%	22
Unfair	6.86%	12
Neither fair nor unfair	16.00%	28
Fair	25.71%	45
Very fair	25.71%	45
Don't know	13.14%	23

A.100 Respondents were asked to comment on the proposed split of the licence fee into £760 non-refundable on application and £451 on grant. 74 respondents provided a written response. Views were mixed. Many respondents supported the principle of a split fee, particularly where it encourages serious applications and covers administrative costs. However, others raised concerns about fairness, proportionality, and the financial risk to applicants if a licence is refused.

A.101 A common view in support of the split was that a non-refundable application fee helps ensure only serious and prepared applicants come forward. Respondents noted that paying a significant upfront fee would encourage landlords to “get their ducks in a row before putting the application in” and ensure properties are up to standard prior to submission. Others commented that it would “ensure only serious applicants” and “stop time wasters”, as landlords would be less likely to submit speculative or poorly prepared applications.

A.102 Linked to this, some respondents felt the application fee should be even higher to act as a stronger deterrent. Comments included that the fee should “discourage borderline applications”, be “much more”, or “make it more expensive”. Others argued that HMOs are often seen as an easy money-making opportunity, and a higher upfront cost would ensure landlords are committed and willing to meet required standards.

A.103 There was also recognition that the application stage involves real costs to the Council, including officer time for administration and inspections. Respondents commented that the fee is justified because “officer time will be required to inspect premises” and that “staffing cost in the administration process has to be factored”. Some saw the split as a fair way to reflect the different stages of work involved in processing and granting a licence.

A.104 Several respondents felt the split structure itself was fair, stating that “splitting costs is fair to landlords” and that the approach reflects the administrative and compliance processes involved. Others noted that the upfront payment could help fund inspections and ensure the Council has the resources needed to operate the scheme effectively.

A.105 However, there were also significant concerns about the level of financial risk associated with the non-refundable element. Some respondents argued that requiring a large upfront payment places disproportionate risk on landlords, particularly if a licence is refused for minor or technical reasons. One respondent said this could be “disproportionate financial risk”, suggesting the non-refundable portion should be reduced, for example to around 20% of the total fee.

A.106 Related to this, some respondents questioned whether the structure could create perverse incentives. A few comments suggested that the Council might appear to benefit financially from refusing applications, with one respondent stating the split “encourages the council to not grant applications” and makes it “look like they are implementing a scheme just to make money”. Others argued that the majority of costs are incurred during inspection and monitoring, so a larger proportion of the fee should be linked to the grant stage rather than the application.

A.107 There were differing views on how the fee should be structured. Some respondents suggested the full fee should be paid upfront and be non-refundable, arguing that landlords should take full responsibility for ensuring compliance before applying. Others proposed alternative structures, such as:

- A lower upfront fee and higher payment on approval

- A flat inspection fee plus a per-room charge
- Annual or ongoing fees linked to compliance and inspections
- Additional charges for reapplications or appeals

A.108 These suggestions reflect a broader desire for a system that is both fair and effective in encouraging compliance.

A.109 Some respondents raised concerns about the overall cost rather than the split itself, reiterating that the total fee is too high and may increase rents or discourage participation. Others felt the opposite—that the total cost is too low and should be increased to strengthen the deterrent effect and ensure proper regulation.

A.110 There were also comments about enforcement and ongoing compliance, with some respondents suggesting that fees should support regular inspections and potentially include penalties for non-compliance. For example, one suggestion was to introduce charges for follow-up visits or anti-social behaviour incidents to incentivise better landlord management.

A.111 A small number of respondents expressed scepticism about the scheme more broadly, suggesting that high fees could push landlords into operating outside the system and create a "black market" of unlicensed HMOs.

A.112 **Overall, the comments indicate that while there is general support for the principle of splitting the fee, respondents want to ensure the structure is fair, proportionate and transparent. Key themes include ensuring that the application fee reflects actual administrative costs, avoiding excessive financial risk for applicants, and designing the system so that it encourages compliance without creating unintended incentives or discouraging legitimate participation.**

Q14a. Do you agree that licences should last for up to five years?	Response percent	Response total
Yes	32.18%	56
No	54.60%	95
Not sure	13.22%	23

A.113 Respondents were asked whether licences should last for up to five years. **107 respondents** provided a written comment. The overwhelming view was that five years is too long, with many respondents strongly favouring shorter licence periods, more frequent reviews, and ongoing monitoring. However, a minority supported a five-year duration, particularly where balanced with inspections or for well-managed properties.

A.114 A dominant theme was the need for more frequent renewal and review. Many respondents argued that licences should be renewed annually, with repeated comments such as "should be annual", "reviewed every 12 months", and "licence should be renewed every year". Others suggested slightly longer but still shorter periods, typically 2–3 years, with comments including "3 years would be more appropriate", "reduce to 3 years", and "every 2 years". The underlying concern was that too long a licence period could allow standards to slip unchecked.

A.115 Respondents frequently highlighted that a lot can change within five years, including property condition, tenant behaviour, ownership and management arrangements. Comments included that “property conditions could change considerably in that time”, “standards will deteriorate given the timespan”, and that landlords could become “complacent” over a five-year period. Others warned that poorly managed HMOs could “drag an area/neighbourhood right down” if not regularly reviewed.

A.116 There was strong support for ongoing inspection and enforcement, regardless of the licence length. Many respondents said licences should be tied to regular inspections, with suggestions including annual inspections, interim checks, or “spot checks” during the licence period. Others emphasised that licences should be revoked where standards are not maintained, with comments such as “licences should be revoked if violations persist” and “if complaints are being made… it should be possible for the licence to be revoked early”.

A.117 A number of respondents proposed conditional or staged licensing approaches. For example, some suggested an initial shorter licence period (e.g. 1–2 years) followed by a longer licence if the property is well managed. Others proposed risk-based approaches, where compliant landlords receive longer licences while poorly performing ones are subject to shorter terms and more frequent review. One respondent stated that licence duration should reflect “varying risk levels”, encouraging good practice without penalising responsible landlords.

A.118 Another recurring theme was the need to protect residents and communities. Respondents felt that more frequent licence reviews would provide greater protection, allowing issues such as anti-social behaviour, poor maintenance or overcrowding to be addressed more quickly. Comments included that annual renewal would allow “neighbours to do something if there are issues” and that shorter licences would “force the landlord to keep better standards”.

A.119 Some respondents linked shorter licence periods to accountability and deterrence, suggesting that regular renewal and payment would make landlords take their responsibilities more seriously. Comments included “make people renew every year and pay every year” and that annual renewal would prevent landlords from “meeting the first hurdle then not doing anything for 5 years”.

A.120 However, a minority of respondents supported a five-year licence period, often for practical or business reasons. Some noted that five years aligns with existing requirements such as electrical safety certification. Others highlighted the administrative burden of more frequent renewals, stating that completing applications more often could be “too much” for both landlords and the Council.

A.121 Landlord and professional responses also emphasised the need for certainty and stability. Some argued that landlords need to operate within a clear and stable regulatory framework, and that shorter licence periods or frequent changes could discourage investment. One respondent said that a five-year period “gives balance for improvements to be made where necessary” and makes costs “more palatable”. Others warned that shorter licence periods could reduce housing supply if landlords exit the market due to increased regulatory burden.

A.122 There were also suggestions for hybrid approaches, combining a longer licence period with regular checks. For example, some respondents supported a five-year licence provided there are interim inspections or enforcement triggers where issues arise. Others suggested annual reviews or reduced renewal fees for compliant landlords, with higher scrutiny for those with complaints or breaches.

A.123 **Overall, the responses indicate strong concern about the length of a five-year licence. Most respondents favoured shorter durations (1–3 years), annual renewal, or more frequent monitoring, to ensure standards are maintained and issues addressed promptly. While some supported a five-year term for reasons of practicality and stability, there was broad agreement that regular inspection, enforcement and the ability to revoke licences early are essential, regardless of the overall duration.**

Q15a. Do you agree that existing enforcement powers alone are not sufficient to address issues in smaller HMOs?	Response percent	Response total
Yes	79.43%	139
No	10.86%	19
Not sure	9.71%	17

A.124 A significant number of respondents felt that enforcement is currently weak, inconsistent, or non-existent. Some expressed this very bluntly, stating “there is no enforcement I’ve seen or read about in Bolton” and “don’t believe Bolton Council has or has any desire to enforce the regulations.” Others described situations where complaints had been raised repeatedly with little outcome, noting that “we’ve contacted everyone possible… and all departments seem powerless” and that “nothing has changed so they clearly don’t have enough powers to force him to make repairs.”

A.125 There was also a perception that once HMOs are approved, authorities have limited ability to act, with comments such as “hands are tied, they cannot do anything once approved.” This has led to frustration among residents who feel that problems persist despite reporting them.

A.126 Many respondents highlighted that enforcement teams are under-resourced and overstretched, which limits their ability to act effectively. Comments included that “enforcement officers are stretched to the max” and that it would be “difficult to inspect/investigate all cases in a timely manner.” Others emphasised the need for “more inspection” and “more stringent” enforcement processes.

A.127 There was also recognition that enforcement processes can be slow and reactive, often relying on complaints rather than proactive monitoring. One respondent questioned whether enforcement is “based on a complaint system” and suggested exploring more proactive or “innovative practicable approaches.”

A.128 A recurring theme was that poorly managed HMOs continue to operate despite existing powers, suggesting enforcement is not working in practice. Respondents described “hell holes” where landlords “get away with it”, as well as experiences of “drug use, fighting, noise and police incidents” with minimal landlord response.

A.129 Others pointed to hidden or unlicensed HMOs, particularly smaller ones, where “issues aren’t addressed until someone complains” and where properties may operate “under the radar.” There were also concerns about landlords exploiting loopholes or avoiding regulation entirely, for example through single AST arrangements or cash-based renting.

A.130 Many respondents argued for tighter enforcement and stronger penalties, including higher fines and licence revocation. Comments included that “penalties for repeat failure… must be sufficiently high” and that landlords should face “loss of licence” where standards are not met.

A.131 There was also a clear desire to increase landlord accountability, with respondents stating that landlords often “do not take responsibility for their tenants” and should be held accountable for issues such as waste, anti-social behaviour, and property condition.

A.132 Some suggested more proactive inspection regimes, including unannounced visits and regular monitoring by landlords, agents, or the Council.

A.133 Some respondents felt that additional licensing could strengthen enforcement indirectly, by creating clearer standards and a framework for action. For example, one noted that licensing “provides guidance and standards for landlords to adhere to,” while others suggested it could be a more effective or “easier route to stopping issues” compared to current processes.

A.134 There was also a view that licensing would help identify and track smaller HMOs, which are currently less visible and harder to regulate.

A.135 In contrast, a smaller but notable group argued that existing enforcement powers are already adequate, particularly under the Housing Act 2004. These respondents felt that the issue is not a lack of powers, but rather a failure to apply them effectively. Comments included that “existing enforcement powers… are sufficient when applied effectively” and that problems should be addressed through “targeted enforcement against non-compliant landlords” rather than introducing blanket licensing.

A.136 Some also warned that additional licensing could duplicate existing regulations or unfairly impact compliant landlords, without addressing the root causes of poor practice.

A.137 A number of responses pointed to systemic issues beyond enforcement powers, including:

- Long and complex enforcement processes, particularly for anti-social behaviour (“a protracted process… cases take years to resolve”)
- Lack of coordination between agencies (e.g. Council, police, environmental health)
- Limited reporting or follow-through, leading to underreporting of issues
- Challenges in tackling rogue landlords who operate outside formal systems

A.138 There were also comments suggesting that fines alone may not be enough, with one respondent noting that even significant penalties (e.g. £30,000) should already act as a deterrent if properly enforced.

A.139 **Overall, the responses suggest low confidence in the effectiveness of existing enforcement powers in practice, primarily due to perceived under-resourcing, lack of proactive monitoring, and weak follow-through. Many respondents believe that stronger, more visible enforcement and accountability are needed, whether through improved use of current powers or through additional licensing. However, there is also a clear counter-view that the issue lies with implementation rather than legislation, and that existing powers could be sufficient if applied consistently and effectively.**

Q16a. Which of the following do you think would be effective alternatives or complements to licensing? (Select all that apply)	Response percent	Response total
Stronger enforcement only	73.53%	125
Voluntary landlord accreditation	21.18%	36
Targeted licensing in specific areas	25.29%	43
Financial incentives or grants	8.24%	14
Do nothing / no additional action	3.53%	6
Other (please specify)	21.18%	36

A.140 Responses to this question show a clear preference for enforcement-led approaches rather than incentives or voluntary measures, alongside a strong view that landlords should not receive financial support. Many respondents were very direct in opposing grants or incentives, arguing that HMOs are already profitable and that “taxpayers should not support these landlords.” Some described HMO operators as “already raking in huge sums in rent” and felt that providing financial assistance would be unfair. There was a sense that HMOs are fundamentally “money-making schemes,” and therefore any additional support would reward the wrong behaviour.

A.141 Voluntary accreditation schemes were also viewed with scepticism. Several respondents described them as a “tick box exercise” and felt that “self-governance… never benefits the customer/tenant.” While a small number acknowledged that accreditation could complement licensing, the general view was that it would not be effective on its own. Instead, some suggested that if accreditation is used, it should be compulsory, with landlords required to complete training so they properly understand their responsibilities.

A.142 The most dominant theme throughout responses was the need for much stronger enforcement. Many stressed that any approach—whether licensing or otherwise—would only work if it is properly enforced. Comments such as “put the new scheme in and ENFORCE IT STRONGLY” and calls for “heavy fines for any breaking of the rules” were common. There was a widespread belief that current problems persist because enforcement is weak, with some stating that landlords “do whatever they like with no consequences.” Respondents frequently emphasised that penalties should be significant enough to deter poor practice, including the potential for licence removal and property closure.

A.143 A number of responses highlighted the need for more proactive monitoring and inspection. Suggestions included regular and unannounced inspections, better use of data to target problem properties, and clearer reporting mechanisms so residents and tenants can raise concerns easily. Some proposed inspection models similar to other regulated sectors, where clear standards are assessed and publicly evidenced. There was also a call for greater council responsibility in maintaining oversight, rather than relying on complaints.

A.144 Targeting problem areas and landlords was another recurring idea. Some respondents argued that the Council should focus on known “hotspots” or areas with high concentrations of poor-quality HMOs, rather than applying blanket measures. Others stressed the importance of not treating all landlords the same, warning that broad approaches could penalise responsible operators while “rogue landlords… continue under the radar.” Linked to this, there were suggestions for stronger pre-application checks and assessments to prevent poor-quality HMOs being approved in the first place.

A.145 There were also repeated calls for greater landlord accountability, particularly in relation to tenant behaviour and property management. Respondents felt landlords should take more responsibility for issues such as anti-social behaviour, waste, and property condition, and be supported to act quickly where tenants are causing problems. Some suggested linking licence conditions or renewal to behaviour and complaints, or introducing mechanisms that enable landlords to take action more easily.

A.146 A smaller number of respondents raised concerns about over-regulation and its potential impact. These included fears that additional requirements could drive landlords out of the market, reduce the availability of rental housing for lower-income groups, or encourage avoidance behaviour. Some in this group argued that existing powers are already sufficient and that the focus should be on better resourcing, improved coordination, and more effective use of current enforcement tools rather than introducing new measures.

A.147 **Overall, the responses indicate very limited support for incentives or voluntary approaches as standalone solutions. Instead, there is a strong and consistent message that improving outcomes depends on robust enforcement, clearer accountability, more proactive monitoring, and targeted action against poor practice.**

Q17a. What impact do you think the proposed scheme would have on tenants?	Response percent	Response total
Very positive	37.14%	65
Somewhat positive	32.00%	56
No real impact	15.43%	27
Somewhat negative	4.57%	8
Very negative	10.86%	19

A.148 Responses to this question reflected a mixed but nuanced view, with many recognising potential benefits for tenants in terms of improved standards and safety, while also raising concerns about affordability, supply, and how effective the scheme would be in practice.

A.149 A large proportion of respondents felt the scheme would lead to better and safer living conditions. Comments frequently referred to tenants having “better living standards,” “safer homes,” and “a decent standard property to live in.” There was a clear sense that licensing could help ensure tenants are “no longer living in uninhabitable and unsafe environments” and would “provide safeguards” and “reassurance” that landlords must meet certain standards. Some also highlighted benefits around health and wellbeing, stating it could “improve quality of life,” “uplift those who feel HMOs are their only affordable option,” and “benefit decent tenants in terms of health.”

A.150 Several respondents also noted that licensing could give tenants greater protection and confidence, for example by providing “a form of protection when things go wrong” and making them “feel more secure and safe.” Others suggested it could improve accountability and behaviour, with landlords more likely to “scrutinize potential tenants better” and tenants themselves more aware that “inappropriate behaviour will not be tolerated.” There were also suggestions that stronger regulation could help tackle more serious issues, such as preventing HMOs being used for “cuckooing, drugs, trafficking,” and making it easier for tenants to report problems without fear.

A.151 However, a very strong counter-theme was concern about rising rents and reduced affordability. Many respondents stated clearly that “rents will increase,” that costs would be “passed on to tenants,” and that the scheme could “increase rents for people who can least afford it.” Some warned that this could reduce access to shared housing for “students and working professionals” and particularly affect “vulnerable tenants” or those on benefits, potentially forcing them to remain in temporary accommodation.

A.152 Linked to this, there were concerns about reduced supply and choice. Respondents suggested that additional costs and regulation could “drive landlords out of the market,” “reduce the availability of rental housing,” and “shrink supply,” especially for smaller HMOs. Some noted that this could lead to fewer options for tenants and greater pressure on the wider housing system.

A.153 There was also scepticism about how much difference the scheme would make in practice. Some respondents felt that tenants “won’t care” or that “there will always be bad landlords,” regardless of licensing. Others questioned whether enforcement would be strong enough, suggesting it might become “a paper exercise” or “tick-box” process. Concerns were raised that landlords might still “treat people poorly” or find ways around the system, particularly if enforcement remains weak.

A.154 A number of responses highlighted that the impact may vary depending on the type of tenant, with some noting that “tenants are more interested in price, broadband and condition” than regulation, while others felt benefits would depend on “the calibre of tenant.” There were also comments suggesting that high turnover in HMOs could limit long-term impact.

A.155 Some more balanced responses acknowledged both sides, noting that while the scheme could “improve standards, safety and wellbeing,” it also risks “boosting rents” and “reducing smaller HMO supply.” Others pointed out that if requirements lead to significant property upgrades, landlords may need to “evict tenants” temporarily, creating short-term disruption.

A.156 **Overall, the responses suggest that while there is broad recognition that the scheme could improve safety, standards, and tenant protection, this is tempered by strong concerns about affordability, reduced supply, and the effectiveness of enforcement, with many emphasising that the actual impact will depend heavily on how the scheme is implemented in practice.**

Q18a. What impact do you think the proposed scheme would have on landlords and managing agents?	Response percent	Response total
Very positive	24.00%	42
Somewhat positive	26.86%	47
No real impact	17.71%	31
Somewhat negative	18.29%	32
Very negative	13.14%	23

A.157 Responses on the impact on landlords and managing agents were mixed, but generally reflected a clear divide between views on how the scheme would affect responsible versus poor-quality operators, alongside concerns about cost, workload, and potential market impacts.

A.158 Many respondents felt the scheme would have a positive impact on standards and professionalism, particularly by forcing landlords to improve. Comments suggested it would “force landlords/agents to improve,” “raise the standard of the profession,” and ensure landlords better understand “what is acceptable and what isn’t.” There was a strong view that good landlords would have little to fear, with statements such as “any responsible landlord should have their property to a certain standard regardless of licence” and “the good landlords will accept the changes… the bad landlords [will be] deemed a nuisance.” Some also felt it would improve reputation and trust, with landlords being seen as “trusted” and more likely to attract “decent tenants.”

A.159 Linked to this, a number of responses highlighted that the scheme could drive out rogue or poor landlords, with comments noting it would “hit them in the pocket,” “stop rogue people setting up,” and ensure that only “professional landlords will enter the HMO arena.” Others emphasised that landlords motivated purely by profit—described as treating HMOs as a “cash cow” or “ripping people off”—would be negatively affected, which was often seen as appropriate.

A.160 However, there were also widespread concerns about the financial and administrative burden. Many respondents pointed to “additional costs and administration,” “extra workload,” and “bureaucracy,” with some landlords stating it would be “unnecessary… increase my costs and workload.” There was a perception that the scheme could be seen as a money-making exercise by the Council, with comments such as “it appears to be a money making scheme” and concerns about value for money.

A.161 Some respondents warned that the scheme could lead to landlords leaving the market, reducing supply. Comments included “developers will leave,” “some may leave the business,” and that increasing regulation alongside other changes (e.g. the Renters Reform Bill) is “driving many small landlords… to sell their rental properties.” Others suggested some landlords may try to avoid compliance altogether, continuing to operate without a licence or finding ways around the system.

A.162 There were also concerns about knock-on impacts on rents, with several respondents noting that costs would likely be passed on to tenants, and that landlords would respond to “additional cost and admin” by increasing rents or changing their business model.

A.163 A number of responses reflected frustration from landlords who feel over-regulated, particularly those who already meet high standards. Some argued the scheme would have a “negative and disproportionate impact… particularly those who are already compliant,” adding “regulatory complexity without clear evidence” of need. There were also concerns about uncertainty, with changing standards potentially making previously compliant properties non-compliant, discouraging further investment.

A.164 Some comments also highlighted operational challenges, including increased complaints (“threats from neighbours making malicious calls”), pressure on managing agents, and the need for clearer roles between landlords, agents, and the Council. Others suggested managing agents may see more business opportunities, as landlords turn to them to navigate compliance.

A.165 **Overall, respondents broadly agreed the scheme would improve standards and accountability, particularly by targeting poor landlords, but this was balanced by strong concerns about cost, administrative burden, reduced supply, and fairness, especially for compliant landlords. Many emphasised that the overall impact will depend on whether the scheme is fair, proportionate, and effectively enforced.**

Q19a. What impact do you think the proposed scheme would have on local businesses or the wider local economy?	Response percent	Response total
Very positive	28.98%	51
Somewhat positive	22.73%	40
No real impact	21.59%	38
Somewhat negative	5.68%	10
Very negative	14.20%	25
Not sure	6.82%	12

A.166 Responses on the impact on local businesses and the wider local economy were varied and often reflected broader views about HMOs themselves, with both positive and negative expectations highlighted.

A.167 Many respondents felt the scheme could have a positive impact through improving standards and community conditions. Comments suggested that “better standard of homes and a reduction in anti social behaviour” would improve areas, leading to “greater pride of place” and “confidence in the area.” Some linked this directly to economic benefits, noting that improved neighbourhoods could “attract more young professionals who are able to spend money in the town,” support “greater footfall,” and help “good businesses thrive on happy customers.” Others highlighted that “better tenants in the community” and “safer secure homes” would encourage people to stay in the area rather than move away, which in turn would support local businesses.

A.168 There was also a view that well-managed HMOs can contribute positively to the local economy, particularly by housing working people. Some responses noted that HMOs “provide essential accommodation for students and working professionals who contribute to local businesses,” while others pointed out that landlords themselves support the economy by “hiring local cleaners and trades for general maintenance” and bringing “young, relocating professionals into an area to work.”

A.169 However, a significant number of responses raised concerns about negative economic impacts, particularly linked to costs and housing supply. Several respondents suggested that increased licensing costs would lead to “rents… increase to cover the extra costs,” leaving tenants with “less money… to spend in shops.” Others warned that additional regulation could “deter investment,” “reduce housing supply,” and result in “landlords selling properties and leaving the market,” which could limit accommodation for workers and reduce local spending power.

A.170 There were also concerns about the impact of HMOs themselves on neighbourhoods and property values, with some stating they “lower standards in the area,” “change the fabric of an area,” and “decrease property values.” Some respondents linked this to wider economic effects, suggesting that if families move out due to HMO concentrations, it could negatively affect local businesses and services.

A.171 A number of comments reflected uncertainty or mixed views, with respondents stating “not sure,” “can’t see how this would affect the local economy,” or that impacts would “depend on the tenants” or “how involved the council is.” Others emphasised that outcomes would depend heavily on implementation, noting that improvements would only occur “if managed efficiently and strictly.”

A.172 There were also some strongly negative perceptions about HMOs’ broader social and economic role, including concerns about “crime,” “shoplifting,” “anti social behaviour,” and transient populations reducing community cohesion, which respondents felt could indirectly affect local economic stability.

A.173 **Overall, responses suggest that while many see potential for the scheme to improve neighbourhood quality and indirectly support local businesses, there are significant concerns that increased costs, reduced supply, and ongoing negative perceptions of HMOs could offset these benefits. The perceived impact is therefore highly dependent on how effectively the scheme improves standards without undermining housing availability or affordability.**

Q20a. Do you think the proposals could have a different impact on any of the following groups? (Select all that apply)	Response percent	Response total
People on low incomes	42.58%	66
Disabled people or people with long-term health conditions	24.52%	38
Young people	36.13%	56
Older people	19.35%	30
Ethnic minority communities	20.00%	31
Migrants or people with limited English	29.03%	45
Small landlords	30.97%	48
None of the above	29.03%	45
Other (please specify)	10.32%	16

A.174 Responses highlighted that people expect the proposals to affect different groups in different ways, with a strong emphasis on cost, vulnerability, and market impacts.

A.175 A dominant theme was concern about low-income households, young people and those reliant on shared housing, with many stating that costs would be passed on through rent increases. Comments included that “these costs would likely be passed on to tenants,” “increase costs for them i.e. rents,” and “cost implications as landlords would put the licence fee onto the rent.” Respondents warned this could “price people out,” “increase the burden on homelessness services,” and lead to “lack of affordable housing” or a “shrinking supply of rooms to let, price going up.” Some noted that “not everyone can afford £700+ rent per month and they need options,” suggesting the scheme could reduce access to essential low-cost accommodation.

A.176 There were also repeated concerns about small landlords, with many suggesting they would be disproportionately affected. Responses stated that “it will drive more small landlords… out,” that they “may not have the money to pay for the licence,” and could “opt to sell their properties or increase rents.” Some felt this would lead to a shift in the market, with “London based landlords with huge portfolios” replacing smaller, local landlords who “maintain their properties well.” Others warned that increased regulation would make people “less likely to get into renting due to amount of regulation and costs.”

A.177 At the same time, some respondents recognised potential benefits for vulnerable groups, particularly tenants at risk of poor housing conditions. It was noted that groups with “less of a voice… are more vulnerable to exploitation and poor housing conditions,” and that licensing could “improve standards,” “provide better accommodation,” and offer “protection… from rogue landlords.” A few highlighted benefits for people with health needs, stating that “all those with health implications would benefit from an improved living environment.”

A.178 However, there were mixed and sometimes conflicting views about specific groups. Some responses suggested the scheme could reduce exploitation of migrants or vulnerable tenants, while others expressed concerns about the location and management of HMOs, including perceptions about “four men… being put in a HMO in a street where families live” or issues with integration and access to services. These comments reflect wider community concerns rather than direct policy impacts.

A.179 A number of respondents also pointed out broader system effects, noting that if landlords exit the market or reduce supply, it could affect multiple groups simultaneously. For example, “every group could be affected positively or negatively,” depending on how the scheme is implemented, and whether it leads to improved standards or reduced availability.

A.180 There were also suggestions that support or flexibility may be needed, particularly for smaller landlords, such as “instalment payment options” or “additional time to meet licensing requirements,” to avoid unintended consequences for supply.

A.181 Overall, responses suggest that while the proposals are seen as potentially improving standards and protecting vulnerable tenants, there are significant concerns that increased costs and reduced supply could disproportionately impact low-income households, young people, and smaller landlords, with wider knock-on effects across the housing market.

Additional comments

Summary of open-ended survey comments

A.182 A total of 109 respondents provided further comments at the end of the online survey. These comments were wide-ranging and often strongly expressed. The main themes are summarised below.

Concerns about the number and concentration of HMOs

A.183 A dominant theme was concern about the perceived growth in HMOs across Bolton. Many respondents felt there were already “too many HMOs” and called for the Council to limit or stop further conversions. Some comments focused specifically on the impact of HMOs in residential streets and family housing areas, with respondents stating that HMOs were “ruining” communities, reducing the availability of family homes and changing the character of neighbourhoods.

A.184 Several respondents asked the Council to consider introducing caps or limits on the number of HMOs in a given area. One respondent suggested that, in the same way councils can limit the concentration of hot food takeaways, “a limit should be set” for HMOs. Others called for stronger planning controls, including making planning permission mandatory and ensuring that the location and density of HMOs is properly considered before approval.

Impact on neighbours and local communities

A.185 Many comments focused on the impact of HMOs on neighbouring residents and existing communities. Issues raised included anti-social behaviour, noise, parking pressure, waste management, poor property maintenance and the perceived devaluation of adjacent homes.

A.186 Respondents gave examples of concerns about “different people going in all the time”, gardens and properties being left in poor condition, cars blocking drives, and worries about fire and gas safety. A number of comments asked the Council to give greater weight to the views of residents living near proposed HMOs, including through direct consultation before applications are approved.

A.187 There was also a strong view from some respondents that the wider impacts of HMOs are not fully understood, including the effect on mental health, community cohesion and confidence in the local area.

Support for licensing and stronger regulation

A.188 Many respondents supported the introduction of additional licensing, particularly where it would improve standards, safety and management. Comments included that the scheme “should have happened years ago” and that “the sooner licensing is introduced, the better”.

A.189 Supportive respondents often saw licensing as a way to ensure landlords are accountable and that HMOs are safe, well managed and properly maintained. Some suggested that licences should be revoked where there are serious management failures or repeated anti-social behaviour issues.

A.190 Several respondents also called for more rigorous checks before licences are granted, including fit and proper person checks, financial checks, planning checks and stronger links between Council departments. One respondent suggested a “points system”, similar to the DVLA model, where failures could be recorded against a landlord or licence.

Calls for stronger enforcement and better resourcing

A.191 A strong theme was that licensing will only be effective if it is properly enforced. Several respondents said the Council needs to be more proactive, with more inspections, better monitoring and stronger penalties for landlords who fail to maintain properties.

A.192 Comments included calls to “come down hard on those that avoid the scheme”, “get tougher on landlords” and ensure that enforcement is “seen to be done fairly and in a timely manner”. Some respondents felt the Council already has powers available but does not use them effectively enough.

A.193 A number of comments also stressed the need for sufficient staffing and resources, with one respondent stating: “This needs to be properly resourced.” Another suggested that the Council should have a dedicated HMO/licensing team to improve consistency and coordination.

Concerns that existing powers may be sufficient

A.194 Not all respondents supported additional licensing. Some argued that the Council already has sufficient powers to deal with poor standards and anti-social behaviour, and that the focus should be on enforcing existing regulations rather than introducing a boroughwide scheme.

A.195 One respondent stated that “existing regs already allow for the enforcement of the issues that people are concerned about”. Another, responding from a professional property/design perspective, argued that "proportionate, risk-based enforcement and clear, consistent guidance" would be more effective than blanket licensing.

A.196 Some respondents felt that additional licensing could create unnecessary costs and uncertainty, particularly for landlords already investing in improving properties.

Concerns about costs and impacts on rents

A.197 Several comments raised concern that additional licensing costs could be passed on to tenants through higher rents. Respondents highlighted the potential impact on people on housing benefit, low incomes or those already struggling with affordability.

A.198 Some landlords and property professionals commented that the additional cost burden could discourage investment, reduce HMO supply or make landlords consider leaving the market. One landlord commented that "every additional obstacle" made them more likely to sell or leave the sector.

A.199 At the same time, other respondents felt the proposed licence fee was too low and suggested that fees should be higher or licences renewed more frequently.

Views on licence duration and inspections

A.200 Several respondents felt that a licence period of up to five years was too long. Some called for annual reviews or annual inspections, particularly to ensure standards are being maintained after a licence is granted.

A.201 One respondent suggested that licensing should include "a minimum of one inspection by the authority annually". Others argued that regular monitoring is needed because standards can deteriorate over time.

Property standards and room sizes

A.202 Respondents commented on the proposed property standards, including bedroom sizes, shared spaces, amenities and fire safety. Some respondents wanted stricter standards, particularly in relation to room sizes, overcrowding and fire safety.

A.203 One respondent suggested that increasing minimum bedroom sizes could reduce the incentive to convert smaller houses into HMOs, as landlords would no longer be able to fit as many rooms into smaller properties.

A.204 However, some landlord/professional responses argued that standards should remain commercially viable and aligned with national standards and neighbouring authorities. These comments specifically referred to retaining the **7.5sqm[4] minimum as a baseline**, recognising ensuite-led larger bedroom

[4] The national minimum sleeping room size for a licensed HMO is 6.51m² for one person aged 10 or over. The references in this report to 7.5m² do not describe the national statutory minimum standard. They reflect comments made through the consultation by landlords/professional respondents, who referred to retaining a 7.5m² minimum as a baseline. The consultation findings therefore report the figure as part of the feedback received, but the Council recognises that the relevant national minimum standard is 6.51m² for single adult occupation.

models for working professionals, and allowing shared kitchen/diner spaces rather than requiring separate lounges where justified.

Planning, Article 4 and coordination between departments

A.205 A number of respondents felt that licensing should be considered alongside planning controls. Comments referred to the need for better coordination between planning, housing standards and enforcement teams.

A.206 Some respondents argued that planning decisions do not adequately take account of parking, density, neighbourhood character or cumulative impacts. Others felt that Article 4 and licensing decisions should be developed through proper consultation with stakeholders and should not be driven by short-term political pressures.

A.207 There were also comments that the Council’s current approach can feel disjointed, with concerns about a lack of a single point of contact and insufficient coordination between departments when dealing with problem landlords or repeat issues.

Impact on family housing and need for alternative housing solutions

A.208 Many comments linked concerns about HMOs to wider housing pressures. Respondents raised concerns that family homes are being lost to HMO conversion, while families and local people struggle to access suitable housing.

A.209 Several respondents called for more affordable housing, family housing and better use of empty buildings. Some suggested repurposing empty pubs, shops and rooms above shops as a more acceptable way to meet housing need.

A.210 A smaller number of respondents recognised that HMOs can play a role in meeting housing need if well managed, with one comment noting that HMOs “can be part of the solution” if developed mindfully and to a good standard.

Comments relating to migrants, asylum seekers and community tensions

A.211 Some comments linked concerns about HMOs to wider concerns about migration, asylum accommodation and changes in local communities. A number of these comments were strongly expressed and included negative views about migrants and people perceived to be from outside the local area.

A.212 For reporting purposes, these comments are best summarised neutrally as concerns about perceived pressures on housing, services and community cohesion, rather than repeated in detail. They indicate that some respondents associate HMO growth with wider anxieties about population change, local identity and access to housing for existing residents.

Suggestions for improving the scheme

A.213 Respondents made a number of practical suggestions, including:

- limiting the number of HMOs in specific areas;

- requiring annual inspections or more frequent licence reviews;
- strengthening fit and proper person checks;
- improving consultation with neighbouring residents;
- better coordination between Council departments;
- creating a dedicated HMO/licensing team;
- using stronger penalties for non-compliance;
- recognising and rewarding responsible landlords;
- aligning standards with national guidance and neighbouring authorities;
- ensuring professional operators and landlords are consulted before final decisions are made.

A.214 One respondent suggested a “Bolton Standard” to recognise good landlords and help tenants identify well-managed accommodation.

Overall interpretation

A.215 Overall, the open-ended comments show strong concern about the growth, concentration and management of HMOs across Bolton. Many respondents supported additional licensing as a way to improve standards, protect tenants and give the Council stronger oversight. However, respondents also stressed that licensing must be properly resourced, actively enforced and linked to planning, housing supply and wider neighbourhood management.

A.216 The comments also show that some respondents are not opposed to HMOs in principle, but want them to be better managed, safer, less concentrated and more sensitive to the impact on neighbouring residents and local communities.