

Slough Borough Council

Report To:	Corporate Improvement Scrutiny Committee
Date:	30 July 2024
Subject:	Discretionary Property Licensing
Chief Officer:	Tessa Lindfield, Director of Public Health and Public Protection
Contact Officer:	Rhian Richards Housing Regulation Manager
Ward(s):	All
Exempt:	No

1. Summary

- 1.1 This report provides an update on the discretionary property licensing schemes which became operative in July 2019, following designations made under Sections 56 and 80 of the Housing Act 2004.
- 1.2 The report sets out progress towards the schemes' outcomes and proposes a course of action for the future of property licensing in Slough, when the current schemes cease operating on 30th June 2024.
- 1.3 Detailed information on delivery and outcomes is included in Appendix 1 to this report.
- 1.4 A report will go to Cabinet on the 18/09/2024 with recommendations for the future of property licensing in Slough.

2. Recommendation/s/request for direction from the committee

- 2.1 To acknowledge the contribution of the licensing schemes to the improvement of housing conditions in the designated areas.
- 2.2 To note the learning from the significant challenges faced by the housing regulation team in delivering the schemes.
- 2.3 To recommend to Cabinet that adequate systems for the recording and monitoring of performance be a pre-requisite for any future designations.
- 2.4 To recommend to Cabinet a renewed 'Stock Modelling' exercise be undertaken to establish whether the statutory conditions for further designations are met; and to use the derived data alongside experience gained from the delivery of the existing designations, to design a scheme or schemes that effectively contribute to the objectives of the Corporate Plan relating to health inequalities.

Commissioners' comments

Commissioners have reviewed this report and have no specific comments to add.

3. Introduction

- 3.1** Following an extensive public consultation between November 2018 and January 2019 Slough Borough Council approved the proposal to implement two property Licensing Schemes under Parts 2 and 3 of the Housing Act 2004, to compliment the UK wide Mandatory Licensing scheme for Houses in Multiple Occupation which had been in place since 2006.
- 3.2** The rationale and legal justification for introducing the schemes were set out in detail in the report to Cabinet in March 2019 and further information is provided in Section 2 of the Appendix.
- 3.3** The following licensing schemes are in operation in Slough:
- Mandatory Licensing - This is a UK wide scheme that requires most houses in multiple occupation (HMOs) with five or more occupants to be licensed.
 - Two discretionary schemes:
 - a) Additional Licensing - This scheme applies to the whole of Slough borough and includes all HMOs which are not covered by the Mandatory Licensing Scheme (this scheme ceases 30/6/2024)
 - b) Selective Licensing - This applies to a specifically designated area (most of what was previously Chalvey and Central Wards) and covers all accommodation rented via and Assured shorthold tenancy or licence to occupy which is not an HMO i.e., let to one household (this scheme ceases to operate on 30/4/2024).
- 3.4** The Housing Act 2004, Sections 60 and 84 specify that Additional and Selective licensing designations cease to have effect 5 years after they are made, unless they are revoked earlier. The Additional and Selective licensing schemes in Slough therefore expire on 30th June 2024.
- 3.5** There is no short cut to re-designation and full feasibility assessment, public consultation and approval process must be repeated before further designations can be made. The housing regulation team will determine the indicative costs of doing this and a future Cabinet report will set out in detail the options available.
- 3.6** Though there are significant up-front costs associated with setting up new schemes it is important to note they are fully recoverable through licensing fees and cost recovery would be built into the financial modelling.
- 3.7** All unexpired licences remain in operation after the end of the current designations and Licence holders must continue to comply with their licence conditions.

4. Background

- 4.1** There are statutory conditions that must be met before a Local Authority can make an additional HMO or Selective Licensing designation they are:

a) Statutory conditions and evidence – Additional Licensing

Section 56 of the Housing Act 2004 states that before making an additional HMO licensing designation for a particular area, the local authority must: -

- Consider that a significant proportion of the HMOs in the area are being managed sufficiently ineffectively as to give rise, or likely to give rise, to problems either for those occupying the HMOs or for members of the public.
- Consider whether there are any other courses of action available to them that might provide an effective method of dealing with the problem(s) in question.

- Consider that the making of the designation will significantly assist them to deal with the problem(s)
- Have taken reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made.

(b) Statutory conditions and evidence – Selective Licensing

Section 80 of the Housing Act 2004 states that before making a selective licensing designation for a particular area, the local authority must show the circumstances meet the following: -

- The area has a high proportion of property in the private rented sector i.e., 20% or more. Central and Chalvey wards have a high proportion of PRS (over 50%) in Slough.
- A significant and persistent problem caused by anti-social behaviour or poor housing conditions.
- Consider whether there are any other courses of action available to them in achieving the objectives that the designation would be intended to achieve.
- Consider that the making of the designation when combined with other measures taken by the authority will significantly assist them to resolve the problem identified.
- Have taken reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made.

4.2 In Slough evidence derived from ‘Stock Modelling’, was used to demonstrate a relationship between poor housing conditions and the occurrence of anti-social behaviour (ASB); and a high proportion of HMOs across Slough and all privately rented accommodation in Chalvey and Central wards.

4.3 The stock modelling undertaken by consultants Metastreet Ltd, generated estimates about the size and nature of the private rented sector in Slough, specifically that:

- Slough has 3,500 HMOs.
- In the area subsequently designated for selective licensing, there are approximately 3,700 rented properties eligible to be licensed in the area designated for Selective Licensing.

It should be noted that confidence in the estimates relating to the number and location of HMOs is lower than for private rented sector estimates.

4.4 The discretionary licensing schemes were introduced to facilitate the improvement of housing conditions and property management through proactive regulation, the cost of which to be borne by those operating in the sector.

4.5 The benefits were listed as:

- Licensing schemes provide an effective policy framework to properly regulate and control the private rented sector.
- A property licensing scheme affords more protection to the most vulnerable tenants in the borough.
- Private tenants would have many more rights and protections when renting a licensed property, including written tenancy agreements and additional protections from eviction.
- Can deal with property related ASB at source e.g., by improving management and reducing rubbish/litter and fly tips.

- Opens the use of civil penalties to deal with smaller HMOs and unlicensed selective properties.
 - Identifies non-compliant landlords by their absence from the scheme and allows enforcement action to be targeted at the worst offenders rather than at the majority of compliant landlords.
 - For licences, which have been granted the Council can charge an average fee for enforcement which will assist the Council in being able to afford effective enforcement of the sector.
 - Where housing defects are identified through licensing, landlords act more quickly to carry out repairs.
- 4.6** The Appendix to this report contains detailed information on the outputs and outcomes from the Additional and Selective licensing scheme. For completeness data relating to mandatory licensing has also been included.
- 4.7** The report demonstrates that although there have been significant challenges to the delivery of the schemes, it has brought some measurable benefits to residents.

5. Limitations of Data

- 5.1** Although significant effort has been made to ensure the data provided is as reliable and accurate as possible, limitations associated with the Council's case management system means some data is subject to error; though figures are likely to under, rather than over-estimate the impact. Many of the outcomes achieved were difficult or impossible to record using the Council's legacy case management system Civca App.
- 5.2** Civica App was replaced by Arcus in February 2024. Arcus, like Civica App, is used jointly by Housing Regulation, Trading Standards and Licensing, Food and Safety and Resilience and Enforcement.
- 5.3** Arcus provides a potential solution to some the data management and reporting challenges, but only with significant development and further configuration as the system was launched as a 'minimum viable product'. Although operational managers and team leaders have been trained to undertake the configuration work, they lack the capacity and expertise to undertake this work at the pace required.
- 5.4** The lack of development of Arcus currently poses one of the most significant barriers to improving efficiency across several areas of Public Protection. This has been recognised and resources are being sought to rectify the situation.

6. Licensing Fees

- 6.1** Section 2.9 to 2.12 of the attached report provides information about the fees which accompany licence applications.
- 6.2** The fees were determined based on the estimated costs of delivering the schemes. Fees can only be used for the delivery of licensing functions. The costs that are recoverable through licensing fees include staffing and associated overheads, IT software and equipment, legal costs and management costs.
- 6.3** A discount on fees, offered early in the scheme, though helpful in achieving high application rates, will have an impact on the Council's ability to cover its costs by the end of scheme.
- 6.4** Furthermore, prior to the current designations, Additional Licensing had never been implemented at scale in Slough before, meaning the Council's cost estimates did not

reflect the operational realities. For example, Section 4.3 - 4.7 of the attached report, discusses the Council's application processing time and illustrates the challenge of balancing conflicting priorities; in this case, the need to be as helpful as possible to landlords trying to comply, while maintaining or improving efficiency.

- 6.5** For future schemes, it might assist the Council to have a tiered fee structure, with applicants that require intervention from the Council, paying a higher fee than those who submit comprehensive timely applications. This approach will incentivise landlords to make a valid application, thereby reducing processing times and costs. Alternatively, the Council could offer a chargeable service to landlords for assistance with making an application. Other Local Authorities that have adopted these approaches include the London Borough of Barking and Dagenham and Reading
- 6.6** Housing regulation acknowledge that the fees should be reviewed more regularly, to ensure that costs are being recovered but also, that the fees are fair. It should not be more expensive to be a compliant landlord than to be a non-compliant one.
- 6.7** For any future schemes the Council will have access to 'real-world' data and information on which to calculate its fees, this should help reduce the risk of the Council setting inappropriate fees. Housing regulation will require support from finance to develop a robust 'business plan' for any proposed scheme.

7. Resources

- 7.1** The housing regulation team is responsible for the delivery of the property licensing schemes in Slough. Information about the team structure and resourcing is contained with the Appendix 1 report. The team has been operating with vacancies since early 2021.
- 7.2** Licensing forms only part of the team's functions and officers must prioritise cases based on risk. Emerging issues such as the Covid Pandemic, 'Homes for Ukraine', the response to the inquiry into the death of Awaab Ishak, and the ongoing interventions relating fire safety in high rise residential buildings have all had an impact on the level of resourcing available for licensing activities.
- 7.3** The LGA recognises there is national skills shortage in Environmental Health ([LGA Skills Partnership Hub programme 2023/24 | Local Government Association](#)), and the competition for officers between Local Authorities in London and Southeast is fierce. In Slough, the senior housing regulation officer post has been evaluated at level 6 and we have secured a market supplement as neighbouring boroughs offer higher salaries, and the housing regulation team has lost several highly experienced staff to Buckinghamshire Council and RBWM. Some positive adjustments have been made to the structure of the housing regulation team, with the recruitment of two property licensing coordinators and the creation of a housing regulation lead, but the effective delivery of any future schemes will require the expansion and reorganisation of housing regulation, to create a resource dedicated to Licensing. Even without licensing additional staff maybe required to deliver statutory obligations proposed under the Renters Reform Bill. Any reorganisation will require significant HR support.
- 7.4** In acknowledgement of the skills shortage, the council could consider recruiting more entry level technical officers to undertake compliance activity in lower risk properties and to determine licence applications. The remaining limited number of senior staff would then be free to focus on enforcement and complex casework. This tiered structure would have the added advantage of offering a development pipeline for the environmental health and housing regulation officers of the future.

8. Improvements in Housing Conditions

- 8.1** The Council aims to inspect all HMOs within 5 years of a new application, but this has proved extremely challenging with current resources. Section 4.24 of the Appendix sets out the number of licensed properties that have been inspected since 1st April 2019.
- 8.2** In addition to physical inspections, the Council has also undertaken desktop audits, as set out in section 4.28 of the Appendix. The data demonstrates that Licensing is being used efficiently to improve safety standards and tenancy management, without the need to undertake physical inspections.
- 8.3** Under any future scheme, a relatively small increase in the number of property licensing coordinators could allow the Council to achieve significant improvements in housing conditions and management on a larger scale; with physical inspections being reserved for cases where there is legal imperative to inspect or where desktop audits indicate there is a significant risk.
- 8.4** The Housing Health and Safety Rating System (HHSRS), which is the prescribed method for assessing housing related hazards, provides a useful tool for measuring the impact of the Council's licensing interventions.
- 8.5** Sections 4.30 to 4.37 of Appendix 1 provide further information about the HHSRS and includes data on the number of hazards removed or reduced in licensed properties. Each hazard removed represents a reduction in the risk of harm to residents from housing related hazards, and a positive contribution to the Council's Corporate Plan objective to create '*Affordable, safe and healthy homes – improving the quality of council housing stock and the private rented sector*' under the '*cleaner, healthier and more prosperous Slough*' theme.
- 8.6** Interventions arising from licensing activities are often proactively undertaken, therefore it is reasonable to infer that without licensing, a significant number of the hazards removed, would not have come to the attention of the Council. The occupants of the affected properties would continue to be exposed to the hazards with consequential risks to their health and well-being.
- 8.7** The hazard data only partially reflects the impact of licensing activity. Licensing conditions and other regulatory tools have also been used to achieve improvements in housing conditions and management. Unfortunately, the Council has not been able to record these impacts in a way that is easily reportable. A deep dive into individual case files would allow the collection of more representative information, but this is likely to be difficult as the Council no longer has access to the legacy system, and the retained data is not in user friendly format.

9. Anti-social Behaviour and Licensing

- 9.1** The relationship between ASB and privately rented accommodation in Slough was one of the justifications for introducing Additional and Discretionary Licensing. All property licences contain conditions relating to the management of ASB and nuisance as standard. These conditions have been used to resolve cases of ASB as demonstrated by the case studies in section 4.53 of the Appendix.
- 9.2** It is acknowledged that the use of Licensing conditions alone is unlikely to resolve all cases of ASB, but there are some types of ASB where licensing conditions could be used more effectively, including in relation to waste management.
- 9.3** The current licence conditions relating to waste, impose general requirements on landlords, but they could be improved to include more specific requirements, which are

more easily enforced. For example, we do not routinely require landlords to provide information to tenants about waste collection services and recycling. New standard conditions could be added to any new Mandatory HMO licences, and then rolled out to Additional and Selective licences under future designations. Where licensed properties are a persistent source of nuisance from waste, 'bespoke' conditions can be added to individual licences.

10. Partnership Working

- 10.1** The housing regulation team works with a range of partners in delivering property licensing in Slough. The case studies referenced in the concluding section of **Appendix 1** provide examples where partnership working has led to positive outcomes for residents.
- 10.2** Other partners with whom housing regulation regularly collaborate include Home Office Immigration Enforcement, Royal Berkshire Fire and Rescue Services, Thames Valley Police, HSE in relation to Gas Safety, and a range of internal teams including Accommodation Services, Social Care, Community Development, Trading Standards and recently teams providing services to asylum seekers and refugees. The inclusion of housing regulation in the Public Health and Public Protection Directorate provides significant opportunity for greater collaborative working.
- 10.3** However, it is acknowledged that much of the partnership working undertaken by housing regulation is reactive in nature and in some cases ad-hoc. Notwithstanding there are legal parameters that govern the use of licensing and the design of licensing conditions, for future property licensing schemes, it may assist to have a greater number of partners engaged in the planning and design of the schemes, and throughout the early implementation. Housing regulation welcomes recommendations that might assist in developing and maintaining new partnerships.
- 10.4** Furthermore, there is clear need for greater level of engagement with landlords and tenants and housing regulation would support the revival of the Landlords Forum, and the development of a Tenant's Forum; both of which could contribute to reduced demand for reactive services in the long term. Currently housing regulation lacks the capacity to set- up and deliver both groups, but given the forums are likely to confer benefits across a number of services, there maybe opportunity for collaboration. If the idea is supported by other services, housing regulation could begin scoping the possibilities for the forums and seek assistance from colleagues in communications on the best way to reach out to tenants and landlords about what they might like the forums to address.

11. Recommendations

- 11.1** The existing Additional and Selective Licensing designations expire on 30th June 2024. Legal advice has confirmed that unexpired licences remain operative and can be enforced after the designations have expired, so although new licences cannot be issued after this date, licence holders must continue to comply with their existing licence conditions.
- 11.2** Mandatory Licensing under Part 2 of the Housing Act 2004, remain operative and operators of HMO's occupied by five or more persons commit an offence if they operate their properties without a licence.
- 11.3** The private rented sector now makes up over 30% of Slough's housing stock. Privately rented accommodation is more likely to be non-decent and contain category 1 hazards than other tenures. In 2020, 12% of PRS properties had such hazards, compared to

10% in the owner occupied sector and 5% in the social rented sector ([A fairer private rented sector - GOV.UK \(www.gov.uk\)](#))

- 11.4** Poor housing conditions cost the NHS an estimated £1.4b in 2023 ([BRE cost of poor housing tenure analysis 2023.pdf \(bregroup.com\)](#)) and the impact on children's health and well-being is well documented. The expansion of 'rent to rent' and 'supported living' arrangements offer opportunities for the worst criminal landlords to exploit the vulnerable and cause misery to residents.
- 11.5** It is unlikely that the picture in Slough will buck the trend and given over 30% of Slough's housing stock is in the Private Rented Sector, regulation is critical if the Council is to achieve its Corporate Objective to close the healthy life expectancy gap.
- 11.6** The Government's review of Selective Licensing acknowledges that a single 5 year designation is unlikely to elicit dramatic results, and that further designations will be required ([Selective licensing review - GOV.UK \(www.gov.uk\)](#)). It is clear from the report in Appendix 1 that Licensing is having a positive impact in Slough. Further designations provide an opportunity to address the challenges encountered during the current designations, and to refine and build on the successes.
- 11.7** Without additional and selective licensing, the Council will struggle to achieve the improvements in housing conditions and management and the cost of regulating much of the sector will be borne solely by taxpayers. Furthermore, Councils will be given further statutory powers under the Renters Reform Bill which will significantly increase the demands placed on the housing regulation team, possibly without additional financial support to deliver the new functions.
- 11.8** Unfortunately, there is no fast track to a second designation and the Council will have to repeat the approval process set out in Sections 56-60 and 80-84 of the Housing Act 2004, and associated regulations before making any further designations.
- 11.9** If the Council wishes to consider further designations, it will first need to satisfy itself that the statutory criteria, set out earlier in this report are met. To do this, the Council will need to commission specialist consultants. This will obviously require an investment and indicative costs will be sought prior to any proposal being presented to members.
- 11.10** If the statutory criteria are met, the Council will need to define the specific issues it is seeking to address, design an appropriate scheme and then consult on the scheme. If the Council wishes to designate more than 20% of the privately rented stock for Selective Licensing, it will require an application to the Secretary of State. The application process can be a lengthy, with no guarantee of approval. However larger schemes benefit from economies of scale and the Government's review into Selective Licensing emphasised the risks associated with smaller schemes.
- 11.11** This report seeks comments and recommendations relating to the following proposal, which will be presented to Cabinet in September:
- To work with finance to accurately cost the delivery of licensing and ensure fees are appropriate for full cost recovery.
 - To commission an assessment that will determine whether the statutory criteria for making another designation are met, and to identify the stressors that could be most effectively addressed by either Additional or Selective licensing, or both.
 - To design a scheme or schemes that are highly focussed on tackling those factors that contribute to the healthy life expectancy gap in Slough.

- To ensure that the systems and processes for monitoring performance and measuring impacts of licensing, particularly the Council’s case management system are fit for purpose prior to further designations coming into effect.
- Irrespective of the Council’s approach to discretionary licensing, to review and update the conditions and amenity standards for properties licensed under Mandatory HMO Licensing, ensuring they are lawful, enforceable and relevant.

12. Implications

Financial implications

12.1 Whilst this report focusses on providing an update on the discretionary property licensing schemes it is important to set out the financial context in which the procurement was undertaken. The table sets out the financial position for 2023/24 and the Budget 2024/25.

	Budget 2023/24 £m	Actual 2023/24 £m	Budget 2024/25 £m
Expenditure	0.0	0.085	0.0
Income	0.0	(0.189)	0.0
Net	0.0	(0.104)	0.0

12.2 The 2023/24 net operating surplus of £104,000 was added to the brought forward balance from previous years of £242,000 resulting in a cumulative balance held in 2024/25 of £346,000.

12.3 The Period 2 monitor will establish a forecast for 2024/25 alongside any actions that can be taken to mitigate pressures and maximise income.

12.4 As part of the Medium Term Financial Strategy 2025/26 Licensing fees and charges will be reviewed to determine any differentiation between the current contribution from property licencing schemes and the actual full cost incurred by Slough Borough in the provision of this activity. The outcome from this review will be considered as part of the setting of the fees and charges rates for 2025/26.

Legal implications

12.5 None – this is not a decision-making report.

Equalities

12.6 An equalities impact assessment (EIA) was carried out in the final quarter of 2018/19, prior the approval of the licensing schemes. The housing regulation team, in common with other regulatory services in Public Protection, do not routinely collect equalities monitoring data. Although housing regulation have examined the idea of collecting

data, there is no facility within the existing systems to collate anonymised equalities information in a way that complies with legal requirements.

12.7 A solution might lie in further development of Public Protection’s case management system Arcus and/or Metastreet. Such development would not only benefit housing regulation, but all regulatory teams. However, this is likely to take time to develop and in the meantime the effective and reliable monitoring of the impact of licensing on protected groups will continue to be challenging.

Corporate Parenting

12.8 The impact of the existing licensing scheme on the Council’s Corporate Parenting responsibilities has not been monitored or measured to date. However, the housing regulation team is developing a relationship with SCT Commissioning Team with a view to more effective regulation of ‘Supported Living’ or ‘Exempt Accommodation’ into which care leavers are sometimes placed. These sorts of accommodation are often HMOs, some of which will not meet the criteria for Mandatory HMO Licensing. If the Council chooses not to make a further Additional Licensing Designation, identifying and regulating smaller ‘exempt accommodation’ will be more difficult, having a detrimental effect on the Council’s corporate parenting function.

Risk management implications

12.8	Risks	Potential Impact	Mitigating Actions
a.	Not able to inspect or audit all licensed properties within the five-year operating time of the schemes.	Properties that have not been audited may contain risks to the health, safety and well-being of residents. Residents may mistakenly interpret the existence of a licence as a mark of quality or accreditation, and this may undermine confidence in the schemes.	Expand the use of alternative methods of auditing compliance; using documentary audits for lower risk properties e.g., new builds, properties run by reputable managing agents. Further develop Arcus, the new case management system to streamline the recording of inspection outcomes which will free up officer time to inspect more properties. Utilise data and information obtained through licensing, to make better use of non-licensing powers.
b.	Fees do not reflect the operational costs of delivering the schemes or the scheme too small to offer economies of scale.	Lower levels of satisfaction from landlords about the service they receive from the Council, inability to properly resource delivery of the existing scheme and any future scheme.	Develop a properly costed business plan based on the experience of delivering the existing scheme and use the business plan to calculate fees for Mandatory HMO Licensing and any future Additional or Selective scheme.

12.8	Risks	Potential Impact	Mitigating Actions
	<p>c. Inadequate legacy case management system and lack of investment in the development of the new case management system</p>	<p>Inability to reliably assess the impact and value for money of the existing scheme; makes performance management and service planning challenging.</p>	<p>Investment in development of the new case management system Arcus to allow the Council to realise the system's potential efficiencies. Ongoing technical support with the management of the system to ensure data integrity is maintained.</p>
	<p>d. The expiry of the designations without a firm plan for licensing in Slough means the Council must resort to cumbersome reactive powers to improve conditions. Unexpired licences can still be enforced, but housing regulation will not have the licensing fees to support the activity.</p>	<p>Dissatisfaction amongst residents and landlords; increased risk to tenants arising from the lapse of the schemes and the protections afforded to tenants by the licence conditions. Council officers</p>	<p>Take report to Cabinet in September, setting out a clear plan for reviewing the existing schemes, and assessing the viability of new ones. This will require support from expert consultants with the associated costs. Develop new schemes with a very clear focus, informed by evidence. Continue to use alternative powers to achieve improvements in the meantime.</p>
	<p>e. Lack of complimentary educational activity such as landlord and tenant forums, to support and promote professional landlord behaviour; and to empower tenants</p>	<p>Landlords feel 'hard-done-by' and alienated and refrain from entering into relationships with the Council to provide much needed accommodation. Tenants cannot defend themselves against unscrupulous behaviour and continue to seek assistance from the Council at a time of diminishing resources.</p>	<p>Work with Housing Colleagues to reintroduce a landlord forum and develop a tenant's forum with support from third sector organisations. Restructuring of the team, reference below will be a pre-requisite, as there is currently limited capacity for these complimentary activities.</p>
	<p>f. Existing structure of the housing regulation team does not support the operational delivery and hampers attempts to recruit and retain staff.</p>	<p>Insufficient resources to deliver the schemes to their full potential. Undermines the ability of the Council to fulfil non-licensing related statutory obligations.</p>	<p>If further schemes are to be implemented effectively, the housing regulation team must be restructured and expanded; not only to increase the resource available for licensing, but to ensure the best use of staff skill sets at each level of the organisation.</p>
	<p>g. The approval and setup process for further designations</p>	<p>In year pressure on budgets and resources.</p>	<p>Setup and operating costs are recoverable through Licensing fees and in the long-term</p>

12.8	Risks	Potential Impact	Mitigating Actions
	will require upfront investment.		licensing should reduce demand for reactive services.

Environmental implications

12.9 The environmental impacts associated with this report are positive as licensing gives the Council greater powers to deal with waste management issues in privately rented properties.

Appendices

Appendix 1- Review of Discretionary and Additional Licensing