

**Consultation Responses**

As part of the 10 week consultation exercise the relevant documents were placed on Denbighshire County Council’s on-line consultation portal and hard copies placed in each of the libraries affected by the scheme – Rhyl, Prestatyn, Llangollen and Denbigh. All County Councillors and the relevant Community Councils were also informed of the consultation exercise along with Rent Smart Wales mailshot going out to 1276 landlords in Denbighshire. We also contacted local letting agencies, trade associations, and existing HMO Licence Holders. The majority of the responses received were in favour of the scheme and a summary of the responses along with our comments can be found below:

	<b>National Residential Landlords Association (NRLA) - Response</b>	<b>LA Comments</b>
<b>Opening Statement</b>	Thank you for the opportunity to respond to this consultation. The National Residential Landlords Association (NRLA) is grateful for this chance to give our views as an organisation on Denbighshire Council’s proposal to re-declare Rhyl as an additional licensing area, and extending the Scheme to Prestatyn, Denbigh, and Llangollen. We have read through your consultation documents, and though we appreciate the issues that the Council have mentioned, the NRLA is opposed to the proposed Additional Licensing Scheme. Our reasons are explained below.	No comment
<b>1.1 Effectiveness of the Scheme</b>	The consistent problem that runs throughout the proposal document is that it has not been evidenced that the scheme has hitherto been a success, nor why it should be expanded to three different towns. In the section that details the number of Housing Health & Safety Rating System faults found in Homes of Multiple Occupation (HMOs), the Council has not mentioned how many of these were rectified as a result of the Scheme. The Council has identified correlation, but not causation	Part way through the previous HMO Additional Licensing scheme a decision was made to change our Public Protection software provider which resulted in us not having accurate housing data for 2016-17.  However, the data for the remaining 4 years is accurate and over 1000 inspections were carried out in HMOs. 579 Category 1 hazards and 1193 Category 2 hazards were identified. Most of these hazards have since been remediated or reduced in severity with over 193 units of HMO accommodation having all of their Category 1 hazards resolved as a result of Local Authority action.

		<p>We consider that the evidence provided in the proposal, and the supporting documentation from North Wales Police and North Wales Fire &amp; Rescue Service, does suggest that the scheme has been successful and that this should be expanded. E.g. a quote from NWFRS “During this period, NWFRS have experienced a reduction in fires and complaints in relation to HMOs in the Rhyl area. Previously these premises posed a potentially high fire and risk to life due to the combination of poor management and lack of maintenance / fire safety provision. We wish to express our support for the scheme and encourage the scheme to be widened to include the whole of Denbighshire”.</p> <p>A fire which occurred in a town which wasn’t covered by Additional Licensing resulted in 5 deaths in 2012. This tragic incident may have been prevented had the Licensing Scheme been in place in other areas at this time.</p> <p>Finally, during the consultation exercise, none of the existing licence holders or landlords in Denbighshire made any representation for or against the scheme. The lack of interaction would suggest that people aren’t opposed to the renewal of the existing scheme nor to the expansion to other areas in Denbighshire which can only be seen as encouraging.</p>
1.2	Additional Licensing Schemes exist not only to identify low standards in HMOs but to correct them too. If it has not done so to a decent level, then the Scheme cannot be judged to be successful and should be replaced by more effective methods, which we outline near the end of our response.	We agree, there are other statutes and regulations available for dealing with HMOs, but we consider it more appropriate to use Additional Licensing to tackle property conditions, standards & management of the property:

	<p>In the Conclusion section of the proposal document, the Council asserts the following are benefits of additional licensing:</p> <ul style="list-style-type: none"> <li>• Reduces the risk of fire and other hazards in all types of HMOs</li> <li>• Improves standards of HMOs relating to amenities and repair</li> <li>• Information and support are available to landlords at all times and access to relevant information, and changes in legislation are made available through the Landlord Roadshow.</li> <li>• Ensures overcrowding is prevented due to strict conditions on room standards.</li> <li>• The Licence holder or Manager has to ensure that the property is sufficiently managed and also has to be a “fit and proper person.”</li> </ul> <p>The NRLA believes they can be dealt with outside a local licensing regime. Two examples: being a “fit and proper person” is already a part of Rent Smart Wales (RSW) and anyone can engage with the Landlord Roadshow, which has a duty to inform local landlords of legislative changes regardless.</p>	<p>Other statutes available include:</p> <ol style="list-style-type: none"> <li>1. Rent Smart Wales</li> <li>2. HHSRS (Housing Act 2004)</li> <li>3. Management Regulations</li> </ol> <p><u>1. Rent Smart Wales</u></p> <p>Both Additional Licensing and Rent Smart Wales complement each other and should work hand in hand together.</p> <p>Rent Start Wales (RSW) is a national Welsh registration and licensing scheme introduced by Welsh Government in 2014. Its purpose is to:</p> <ul style="list-style-type: none"> <li>• Secure improved management standards across the sector through training, information sharing and application of licence conditions and assessment of the fitness and Properties of licence applicants and people associated to them.</li> <li>• Collect information about the sector to provide strategic data that will allow national and local government to plan strategically and</li> <li>• Raise landlord and tenant awareness of their rights and responsibilities.</li> </ul> <p>To achieve this the legislation requires that landlords register themselves and their properties and that any person involved in letting or managing property applies for a licence. The licence process involves submission of training evidence and a fitness and propriety assessment is completed as required by section 20 of the Housing (Wales) Act 2014. This is similar to the assessment</p>
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		<p>undertaken under the Housing Act 2004. If it is considered appropriate to award the licence, it is issued with conditions.</p> <p>The key difference between RSW and an Additional Licensing Scheme (ALS) is that its focus is the person managing, their competence and knowledge. Licence award does not involve a property inspection and conditions applied to the licence are rarely property specific. An ALS can assist the local authority with securing specific property standard improvement in an efficient way ensuring that standards are met when licence applications are made. Without ALS the LA relies on enforcement alone, this tends to be a reactive process (normally following tenant complaint) and is time-consuming due to access often being frustrated and administration burdens. Tenants are very often vulnerable, by the time they contact the LA the relationship with the landlord has often broken down and contact with the LA is the last resort. Consequently, securing improvement through licensing is more efficient because the landlord is arranging access and has requested LA involvement and has only a positive impact on the relationship between the landlord and tenant.</p> <p>Fit and Proper Person can be dealt with by both RSW and Licensing, however, for the reasons mentioned above, Licensing is still required as it is RSW does not deal with the property condition.</p> <p><u>2. Housing, Health &amp; Safety Rating System (HHSRS)</u></p> <p>Action can be taken in accordance with the requirements of the</p>
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		<p>Housing Act 2004, however, this is a <b>reactive</b> process whereby properties are visited and full inspections undertaken after for example, the receipt of a complaint from the occupying tenant. The Licensing Scheme is <b>proactive</b>, properties identified are visited and action taken where necessary.</p> <p>Also, with Additional Licensing, each property is risk assessed at the commencement of the licensing procedure. This determines the need for further visits to the property over the course of the five years. All properties will require at least one further full visit during the duration of the licence, with higher risk rated properties which typically have a lower standard of management and / or conditions requiring more frequent inspections, which can be as often as 3 monthly.</p> <p><u>3. Management Regulations</u></p> <p>This is again reactive. This is ineffective for ensuring that any defects identified on an inspection are remediated. However, failure to comply with the Regulations can lead to a prosecution.</p>
<p><b>2.1 Fees</b></p>	<p>The proposed fee structure is excessively high for a landlord to pay, especially considering that they apply per property. Landlords will apply for licences and, likely, pass the cost on to tenants in the form of increased rents to cover the cost of applying for a licence, doing nothing to address affordability. In contrast, criminal landlords will simply ignore the scheme.</p>	<p>The existing Licensing Scheme has been operating for 10 years and the fees have not increased during this time despite operational costs increasing. Incentives and discounts for the fees payable were introduced in 2005 which we have continued with and a further reduction in fees has been introduced which takes into account the number of storeys the building has.</p> <p><u>Example costs:</u></p> <p>A 3 storey property consisting of 5 habitable rooms with a fee of £820 for five years will cost:</p>

		<ul style="list-style-type: none"> <li>• 63 pence a week for each habitable room</li> </ul> <p>For a 2 storey property consisting of 5 habitable rooms with a fee of £620 for five years will cost:</p> <ul style="list-style-type: none"> <li>• 48 pence a week for each habitable room</li> </ul> <p>The identification of “criminal” landlords will be addressed by a number of ways (see 2.4 below)</p>
2.2	<p>We would add that landlords are already in a position where they are under high financial pressure given Rent Smart Wales registration and licensing fees, the likely increase fees as a result of the Renting Homes (Fees, etc.) (Wales) Act, reduction in mortgage relief tax, and deal with rent arrears on their properties. Adding a layer of local licensing fees could force landlords to push costs onto tenants through higher rent.</p>	<p>We have taken into account the fees and costs resulting from other Legislation, including Rent Smart Wales. This is why we have not increased our fees over the past few schemes and have introduced further reductions.</p>
2.3	<p>The NRLA also has serious concerns regarding Fee Structure 4 in Appendix 6. Firstly, it is unlawful to charge to vary or revoke a licence. Secondly, we do not believe the Council is in a position to try to deter landlords from going to tribunal by threatening charges as, if it is successful at the tribunal, the enforcement authority will either secure costs or civil penalty. Therefore, Denbighshire Council could be accused of nudging landlords away from their right to have their say in court. Thirdly, councils can only recover costs from successful prosecutions, and only when they can demonstrate the costs. Therefore, a flat rate of £50 will not be judged acceptable to the court. Fourthly, we would remind the local authority that there is no mechanism for them to recover costs for Rent Repayment Orders, as such a decision is in the gift of the tribunal,</p>	<p>After comments received, we have reviewed “Fee Structure 4 – Enforcement Activities” from the Fees document and have now removed this section.</p>

	and it could recover costs from rent or sale of property if it imposes management orders.	
2.4	The proposal's conclusion also states: "Not only does Additional Licensing identify the whereabouts of HMO properties within the selected areas, but it also ensure "a level playing field across the tenure by ensuring all HMOs meet the same standards and conditions". This is incorrect – it only identifies the HMO landlords that volunteer to apply for a licence, leading to criminal landlords evading justice as the Council's priority becomes processing licenses rather than rooting out rogues.	There is a legal requirement for Landlords / Managing Agents to apply for a Licence and many do approach the Team voluntarily. However, more often than not, the Council are proactive in seeking out "rogue" landlords who try to evade the scheme by not applying. This is achieved by the Team carrying out on-site visits (in response to complaints), street surveys and desktop investigations e.g. Council Tax Checks and Estate Agent Property Website searches.
2.5	Although the NRLA welcomes the discount incentives proposed by the Council, the caveats that go along with them are counterintuitive. The 50% discount for renewing should not apply only if the application is received eight weeks before expiration, but any time until the expiration. We would note that the current wording in Fee Structure 2 in Appendix 6 means the discount only applies if the application is received precisely eight weeks before expiry.	After receiving comments, we have reworded this section in the fees document to explain the reason for the 8 weeks' timeframe. In order to allow sufficient time for a new application to be processed and that there isn't a break in licence from the old to the new, we need 8 weeks to do this. If the application is received with less than 8 weeks of the old licence to run, then the application will not be processed in time before old one runs out which could lead to complications, e.g. not being able to serve Section 21 eviction notice as the property will be unlicensed.
2.6	<b>Gaskin v Richmond 2018 &amp; Fees</b> Mr Gaskin, a Landlord with a portfolio of HMO properties, refused to pay the £1,799 HMO licensing fees charged by Richmond Council in London. The fee was charged by the council upon Mr Gaskin applying to renew his licence and the council justified the charge by stating that it included both a charge for running the council's HMO scheme as well as the cost of processing his application. The High Court's decision when considering the validity of the fee was that it was indeed unlawful. It	We will be offering applicants the option of paying for the Licence in 2 instalments – the first, on initial application and the second, once licence has been granted. However, to clarify things we have introduced a new section into the fees document to confirm this.  The discount provided for renewals is an incentive to ensure that fully completed applications with associated documents are received on-time so that the new licence can be processed and issued without a

	<p>found that the fee, including as it did an upfront charge for the administration of the scheme, breached European Union rules because Mr Gaskin, as someone engaged in a self-employed economic activity (i.e. controlling and managing the rental of properties), was a “service provider”. This meant that the fee for the administration of what amounted to an “authorisation” scheme was unlawful under the EU Services Directive (Directive 2006/123/EC).</p> <p>The council must take into consideration the court ruling of the above case, which states that councils split their licence fee into two parts: stage one for the processing costs of the licence, and stage two if the licence is granted which covers enforcement costs of the licence. Only if a licence has been granted can the council request the second part of the licence fee. For a renewal of a licence for existing licence holders, the council must charge less as the necessary stage one information has already been obtained.</p>	<p>break in licensing from the old to new scheme.</p> <p>Late, partially completed applications, or ones received with missing documentation take longer to administer and chase-up and therefore will be charged at the full cost and not the reduced rate unless there is a justifiable reason for doing so.</p>
<p><b>3.1 Licensing Conditions</b></p>	<p>The NRLA has concerns with the following <i>condition</i>: “<i>The licence holder must not only satisfy to the authority that reasonable procedures are in place with regards to ASB, but must also require a local connection, i.e. be locally based or within one-hour travelling distance of the licensed house.</i>”</p> <p>The Council has taken the position that it is the licensee’s responsibility to ensure their tenants do not exhibit ASB. It is why anti-ASB clauses are virtually always a part of a tenancy agreement and are often why PRS landlords would serve a Section 21 notice. The Council should instead be working closely with landlords to deal with problem tenants rather than make it a</p>	<p>Overall, there has been a steady decrease in the number of ASB incidents over Denbighshire as a whole, although Rhyl continues to have the highest total number of ASB incidents, the above three wards have been identified with the second, third and fourth highest number of ASB incidents within the County.</p> <p>The Additional Licensing Scheme applies conditions which aim to tackle antisocial behaviour within HMO properties.</p> <p>We work closely with landlords and are happy to assist them where necessary in dealing with problem tenants. The majority of landlords do</p>



	<p>licensing condition here. Otherwise, the message to landlords is that they will be punished with the revocation of a licence rather than the guilty tenant. It is not an equitable situation to force landlords who have invested in providing a home for those in Denbighshire, increasing local economic activity and housing provision for young people. Additionally, the local connection requirement is unreasonable, especially given this will be a retrospective change for those in Prestatyn, Denbigh, and Llangollen that might not satisfy these requirements at present yet are still good landlords. Also, the hour travelling distance rule is arbitrary – what if the landlord lives one hour and five minutes away? Does this make them less capable or less responsible than a bad landlord that lives nearby? Rent Smart Wales already has a 200-mile rule, so this condition will mean the Council contradicting another standard of Wales’ single licensing authority. This will be hugely problematic for landlords who will have two contradictory distance requirements causing confusion based on no empiric evidence. The NRLA would also argue that it infringes on Rent Smart Wales’ mandate and is an example of overreach by the local authority.</p>	<p>have procedures in place to deal with ASB incidents and such problematic tenants. We have however, also identified landlords who do not deal with anti-social behaviour and bad tenants and who don’t carry out the required necessary checks. In light of this, a tighter and more robust scheme with stricter ASB Conditions is required to deal with these minority landlords. This has been supported by North Wales Police.</p> <p>Agreed with NLRA response - LA to change the one-hour requirement rule to the same as Rent Smart Wales, i.e. the onus is put onto the licence holder to ensure that robust management arrangements are in place for the five-year duration of the licence. This includes regular visits to the property at appropriate intervals by the licence holder / manager.</p>
<p><b>4.1 Waste Management</b></p>	<p>It should be noted that the impact assessment published by the Council admits that <i>“Managing waste system can be difficult even after provision of bins. Lack of tenant responsibility/abuse of the system and there is no system in place re who enforces. Communal areas - no recognised responsibility for placing out bins or waste is mixed up, leading to refuse collectors refusing to collect. Therefore, this continues the waste issue.”</i> Given that better</p>	<p>We acknowledge that waste is an ongoing issue and a big challenge in the Rhyl area; Fly tipping in particular being a problem from HMO’s due to the transient population of the properties. We further acknowledge that the past two schemes have not fully addressed the waste problem. However, we have consulted with our Waste Team on what they recommended should be done to improve the situation. This is the reason the existing conditions on waste enforcement have been</p>

	<p>waste management is one of the main reasons given by local authorities to introduce additional licensing, admitting the issue continues years after implementation hugely undermines the Council's arguments in favour of renewal and expansion.</p> <p><i>Appendix 5 notes that the Council estimates that "approximately 30% of in-field officer time (Enforcement officers x 2 and Recycling technical Officers/ advisors x 5) is spent in the area of West Rhyl alone, in an attempt to resolve fly-tipping and non-compliant waste behaviours amongst residents)." Given this strain on Council staff to focus on one part of enforcement in one area where the scheme is already active, how can landlords and tenants have confidence in the Council's ability to implement the Scheme effectively elsewhere?</i></p>	<p>amended and strengthened to overcome the highlighted deficiencies.</p> <p>Through the introduction of a more proactive "prevention better than cure" approach, we anticipate the waste situation to improve with a reduced requirement for enforcement thereby increasing our capacity to cope with the problems.</p>
<p><b>5.1 General issues with local licensing schemes</b></p>	<p>There is little evidence that licensing schemes improve housing standards. The focus of staff becomes the processing and issue of licences, while prosecutions centre on whether a property is licensed or not, rather than improving management standards and property conditions. Furthermore, the Renting Homes (Wales) Act 2016 will introduce a new universal standard for renting. The use of further licensing schemes would be seen to undermine the Welsh Government's work as well as reducing the overall effectiveness of the provisions relating to Fitness for Human Habitation standards. There are over 140 Acts of Parliament that affect the PRS in Wales, and three significant pieces of housing legislation have passed through the Assembly since 2014, never mind countless regulations. When combined with RSW, there is plenty of information available to enforce correctly. Councils should</p>	<p>We disagree with this comment "There is little evidence that licensing schemes improve housing standards" - Please see previous response in section 1.1 above.</p> <p>Our priority is to ensure that the condition and standard of a property is improved and the health and safety of occupying tenants are protected. Prosecution is a last resort and mainly applies to those landlords who attempt to evade the scheme.</p> <p>We disagree with the comment "Councils should use the enforcement powers already granted to them to root out rogue landlords"</p> <p>LA's should make use of all available legislation in order to improve the management and condition of the properties. As stated in Section 1.2, all legislation, including that of RSW should work hand in hand together.</p>

	<p>use the enforcement powers already granted to them to root out rogue landlords.</p> <p>Landlords, especially those with properties outside the licence area will become risk-averse in terms of the tenants they let to. Tenant problems such as ASB are impossible for the landlord to address alone and they will not wish to risk a breach of licensing conditions that may affect their ability to let properties elsewhere. Some may seek to evict already challenging tenants, resulting in additional costs to other local authority services and further burden on local housing services.</p>	<p>The Renting Homes (Wales) Act 2016 is not yet in force and there is no clear date for implementation now due to delays that are inevitable given the Covid-19 pandemic.</p> <p>With regards to ASB, the LA has Full Support of North Wales Police. The LA can assist Landlords with problem tenants, guiding them on their legal responsibilities and advising them on the best course of action where necessary, including giving the Licence Holder advice on their anti-social behaviour policy or the eviction process. Hopefully with such assistance or advice from the LA, the need to always and immediately evict problem tenants can be avoided thereby avoiding further burden on the local housing services</p>
<p><b>6.1 Conclusion</b></p>	<p>In conclusion, the NRLA opposes the scheme as we do not believe it has evidenced that progress has been achieved because of additional licencing. There are plenty of less burdensome and more effective ways to improve standards in the PRS available. We all want to see bad landlords driven out of the PRS, but licensing is not the answer. All it does is identify and tax the good landlords who register. They do nothing to flush out criminals who stay under the radar. Instead, councils should use the wealth of data they can already access to find landlords to target resources to properly enforce the full range of powers they have to deal with unsafe and sub-standard rented housing.</p> <p>Rather than expanding an ineffective licensing scheme, the NRLA advocates Denbighshire Council use council tax records to identify private rented properties and landlords. Unlike licensing, this does not require self-identification by landlords, making it harder for the</p>	<p>We disagree with this comment - Please see comment response section 1.1 above</p> <p>The Licensing Scheme is proactive in that council tax records are checked prior to sending out application forms. In doing this, DCC is actively searching for and is identifying the whereabouts of HMOs which require licensing. Once identified, and whether owned by good or bad landlords, the same Licensing process is then followed to ensure the properties are in a safe sound condition for the occupying tenants. Failure to licence may result in the service of an Interim Management Order on the non-compliant / "rogue" landlord (DCC has served 2 IMO's and is in the process of procuring a third IMO Contract).</p>

	<p>small minority of criminals to operate under the radar. We understand this means giving up on a licensing scheme on which the Council has worked hard. However, using council tax records to identify criminals would allow a local authority to proactively tackle criminals quickly, instead of adding a layer of bureaucracy to good landlords.</p>	
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**Other Consultation Responses:**

	<b>Consultee Response</b>	<b>LA Comments</b>
<b>Cllr Barry Mellor</b>	<p>It would be good to know if the licensing we have in place has worked, is strong enough. We have some bad landlords in Rhyl the more we can tighten up the better. When planning comes in for a house to be changed into an HMO is it explained to the owners our licensing policy on HMOs?</p>	<p>See Appendix 3 - Letter from Fire Service for confirmation of success of the scheme with regards to Fire Safety. Conditions have been adapted where we are aware that they need to be improved. We have close working relations with Planning &amp; so they are aware of the requirements for HMO Licensing.</p>
<b>Cllr Joan Butterfield</b>	<p>I'm very much in favour of this scheme being extended to the areas you have mentioned. It would be good before we proceed to the inclusion of other areas to give us the Information of how successful the licensing has been in the area it already serves. Have the number of licensed premises increased since the licensing regulations changed? E.g. Landlords with properties with over five flats have had to be Licensed, but this number has since been reduced.</p> <p>I wanted to know because as we are able to Licence premises with, ( I think three flats ), we might have increased the numbers of Licensable properties.</p>	<p>We have received positive letters of support from NWFRS and also NWP in favour of the existing scheme for Rhyl and they would like this expanding county wide. Over the 5-year period that the scheme has been in operation over 1000 inspections have been carried out in HMOs identifying 579 Cat 1 Hazards and 1193 Category 2 hazards. Most of these hazards have since been remediated with over 193<sup>1</sup> units of HMO accommodation having all of their Category 1 hazards resolved as a result of Local Authority action</p> <p><sup>1</sup> This figure does not include statistics from 2016-17 when we changed databases.</p>

		The number of properties eligible for licensing has increased as a result of the introduction of HMO Additional licensing. Originally there were just 33 Mandatory HMO licenses, but with the introduction of Additional Licensing, this has increased to a total 178 Licensed properties in Denbighshire (which includes 145 Additional Licensed properties).
<b>Cllr Jeanette Chamberlain Jones</b>	I am happy with the new arrangement for Additional licensing as there are still far too many HMO's. The more properties licensed the better it will be to improve the areas of deprecation. I hope we can license as many as possible.	No comment
<b>Cllr T Melvyn Mile</b>	No, I'm fine with the HMO licensing proposal. It will help safeguard the vulnerable and put more responsibility on landlords.	No comment
<b>Cllr Tony Thomas</b>	Thank you for the email. As Lead Member you have my full support on this very comprehensive document building on the solid work that has been done on Licencing in Rhyl over the last 10 years.	No comment