

Mr. S. Boyling
monprops@fastmail.fm

Our Ref: [COM/15748]

Date: 11 November 2025
Email: complaints@thurrock.gov.uk

Dear Mr. Boyling,

Re: Stage 1 Complaint

Thank you for your raising your complaint about selective licensing. I am sorry that you have been given cause to complain and I would like to thank you for taking the time to raise your concerns with the Council.

Statement of Complaint

It is my understanding that you raised your concerns prior to raising a complaint due to inaction' from the Council. In that initial contact with the Council, you raised a number of issues in relation to Thurrock Council's proposed Selective Licensing Scheme, which is due to become enforceable on 5 January 2026. I note the issues you have raised are in relation to the consultation process, evidence base, and implementation arrangements. The following provides a detailed response to each of the issues raised, with reference to the Cabinet Report, Consultation Summary, and Evidence File considered by Members on 17 September 2025.

How we have investigated your Complaint

Following receipt of your complaint, we have thoroughly investigated your concerns and can confirm your complaint is not upheld, however this response also directly answers your issues as outlined in all of your correspondence with the Council. This approach has been taken as not to confuse anyone and for you to only receive one response from the Council, rather than different teams or officers.

1. Consultation Process and Engagement

Thurrock Council undertook a wide public consultation exercise between 13 May and 22 July 2025, in accordance with Section 80 of the Housing Act 2004.

This included:

- Direct communication with local letting agents and landlords on the Council's mailing list (171 email addresses);
- Press releases and information in the resident newsletter (circulated to around 90,000 households);
- Notification to participants on the Engagement HQ database (circa 9,000 residents);
- Materials hosted on the Council's consultation portal; and
- Stakeholder events for landlords/agents, and residents.
- Held two public meetings (Online) on 28 May and 25 June 2025, which allowed for questions to be raised by anyone present during the meetings.

This consultation exercise was open and communicated in a number of different mediums, there was no 'closed pool' of people selected to partake but was open to the public. Indeed, the consultation and scheme has been widely reported on by landlord specific organisations such as 'Landlord Today' and 'LandlordZONE', local agents have published articles, as well as other media outlets such as property118.com and NubNews (local news outlet) as well as others.

While every effort was made to reach all relevant stakeholders, the Council recognises that some agents or landlords may not have directly engaged with the consultation. Nevertheless, the process was open and publicly accessible to all via the Council's website and social media channels.

Responses were analysed by the Private Housing Team and summarised in the published Consultation Findings Report (Appendix 3).

A total of 207 responses were received via the Council's consultation portal, of these:

- 38.2% were local residents
- 29% were landlords or letting agents
- 25.1% were tenants in the private rented sector
- 2.4% responded on behalf of a business
- 2.4% responded on behalf of an organisation
- 2.9% were other

Source: Thurrock Council Selective Licensing Consultation Report

All responses were analysed by the Private Sector Housing Team using a structured thematic approach. Feedback was not "weighted" by group, but categorised and summarised to identify the key issues raised by all stakeholder types. The final Cabinet report (17 September 2025, Appendix 5) includes a breakdown of responses by stakeholder category and thematic area.

The full report is available at [\(Public Pack\)Agenda Document for Cabinet, 17/09/2025 19:00](#)

In your letter of 23 of October, you reference the total adult population of Thurrock and the total response rate to the consultation and draw a conclusion from comparing these two figures. All interested parties were able to respond to the consultation and as stated above, there was both promotion by the Council and by numerous other sources. The Council is unable to compel people to respond to engage with consultations we issue but we make every effort to ensure that appropriate publicity and engagement was undertaken. It was not possible for us to contact each landlord individually in the borough relating to this scheme as that is not information we currently hold. For more information relating to the results of the consultation, please see the above link.

Your letter of the same date also references language used in the consultation and the information regarding costs of the scheme being passed on to tenants. Thank you for raising your concern in this area, affordability and the potential impact on rents in the borough were a core consideration of the team when reviewing the scheme and, after investigation, we established that the current fee levels would represent just over 1% of the total rent an average property would incur over the 5-year licensing period. The Council does not control the amount of money that a landlord charges their tenant, and any increases would likely factor in issues such as finance modelling, interest and mortgage rate fluctuations as well as individual circumstances of landlords and tenants.

2. Evidence Base and Policy Justification

The council followed the '*Selective Licensing in the private rented sector: a guide for local authorities*' to design its selective licensing scheme. This guidance explains the criteria for making a selective licensing and discusses the type of evidence needed to support a designation.

Currently local authorities have powers to introduce selective licensing of privately rented homes in order to tackle problems in their areas, or any part or parts of them, caused by:

- low housing demand (or is likely to become such an area)
- a significant and persistent problem caused by anti-social behaviour
- poor housing conditions
- high levels of migration
- high level of deprivation
- high levels of crime

The council's scheme covers 16 wards grouped into four designations based on the criteria set by legislation.

The Evidence File (Appendix 1) in the Selective Licensing Cabinet Report dated 17 September 2025, sets out the detailed analysis underpinning the proposed designation, including data on anti-social behaviour, deprivation, housing condition, and tenure mix.

The data demonstrates that in certain wards, particularly parts of Tilbury, Grays, and Purfleet, there is a strong correlation between high concentrations of privately rented housing and issues such as poor property conditions, and complaints of anti-social behaviour. This is recognised in the design of the scheme and the associated guidance from government.

While it is recognised that deprivation exists across all tenures, the Housing Act 2004 specifically empowers local authorities to apply selective licensing to the private rented sector where it will assist in improving management and living conditions. The designation therefore targets this tenure in accordance with the statutory framework.

The justification for the scheme has been published in the associated documentation and has been described above, but it is important to note that whilst individual landlords may have rigorous maintenance and inspection routines, this is not a uniform approach across the sector. This selective licensing initiative will help to ensure that all properties meet the requirements of the scheme and where they do not, will enable the Council to take appropriate enforcement action.

3. Licensing Fees and Comparisons with Other Authorities

The licensing fee structure has been calculated in line with Section 87(7) of the Housing Act 2004. It states that local authorities may take into account all costs incurred when carrying out their selective licensing functions. The power to charge fees is set out in Section 87(3) of the Housing Act 2004 and allows the Council to require a licensing application to be accompanied by a fee. Regulation 18 of the Provision of Service Regulations 2009 states any changes 'must be reasonable and proportionate to the cost of the procedures and formalities under the scheme and must not exceed the cost of those procedures and formalities'.

Reference	Part I Application, management cost Phase	Band	Cost per hour	Estimated Hours	Estimated Cost
1.1	Licensing administration: create record, process application, manual inputting data.	Band D	£ 19.11	1.1	£ 20.08
1.2	Deal with landlord application enquiries	Band D	£ 19.11	2.0	£ 38.22
1.3	Consider Any Supporting Documents	Band D	£ 19.11	1.0	£ 19.11
1.4	Fit and Proper Person Check, (a Criminal Record Check, Financial Assessment, Management Competence, Reference collation and review, Compliance with Regulations)	Band D	£ 19.11	1.0	£ 19.11
1.5	Check Property Details On Land Registry, Rogue Landlord Database, And History of property	Band D	£ 19.11	1.0	£ 19.11
1.6	Collection of application fee and update payment on to records, production of remittance advice	Band D	£ 19.11	1.0	£ 19.11
1.7	Determine application and set out any requirements e.g. for works etc.	Band D	£ 19.11	1.0	£ 19.11
1.8	Draft licence to relevant persons	Band D	£ 19.11	1.0	£ 19.11
1.9	Prepare licence	Band D	£ 19.11	1.1	£ 21.02
1.1	Other scheme costs (e.g. advertising, tracking landlords, publishing landlords, etc.)	Band D	£ 19.11	1.5	£ 28.67
1.11	Land registry (includes £6 fees)	Band D	£ 19.11	0.8	£ 14.33
Sub Totals for application phase				12.4	£ 236.98

Part 2 Compliance monitoring and maintenance phase

- 2.1 Inspection, re-inspection (no access) verification of registration conditions, advice to
- 2.2 Scan And Update Inspection Notes
- 2.3 Compliance monitoring, advice provided to landlords and response reviewed
- 2.4 Documentation verification (compliance safety certificates, tenancy agreements and deposition protection scheme enrollment)
- 2.5 Collection and preparation of evidence for formal action
- 2.6 Compliance monitoring, advice to landlords, etc.
- 2.7 Consultation and other work with landlords over the scheme
- 2.8 Follow Up With Applicant and perform any required Re-Visits
- 2.9 Administration Sign Off
- 2.1 Update IT Systems
- 2.11 Manager input* expertise, coordination, reporting, discipline
- 2.12 Legal advice (in house) @ 1 week a year x 5 years =12.5% of a single year's salary
- 2.13 Create Licence, Add Conditions
- 2.14 Email Applicant with update
- 2.15 Land Registry Fee
- 2.17 Landlord Support

Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band G	£	37.88
Band E	£	22.33
Band E	£	22.33
Band D	£	19.11
Alternative Band	£	48.00
Alternative Band	£	48.00
Band D	£	19.11
Band D	£	19.11
Band D	£	19.11
Band D	£	19.11
Band D	£	19.11

2.0
0.3
2.0
1.0
2.0
1.0
0.7
0.5
0.5
0.7
1.8
4.3
0.5
0.2
0.3
0.2
18.0

£ 44.66
£ 6.70
£ 44.66
£ 22.33
£ 43.54
£ 22.33
£ 26.15
£ 11.17
£ 11.17
£ 13.76
£ 86.40
£ 296.40
£ 9.54
£ 3.82
£ 5.73
£ 3.84
£ 562.29

Sub Totals for compliance monitoring, scheme promotion and management, etc.

Part 3: Housing Enforcement

- 3.1 Identifying Non-Compliance, (Monitoring Databases, Complaints from
- 3.2 Investigation (Inspection of the Property, Gathering Evidence
- 3.3 Issuing Notices (Informal Warnings, Prohibition Orders, Civil Penalty Notices)
- 3.4 Legal (Action Prosecution, Rent Repayment Orders,
- 3.5 Follow-Up and Compliance Monitoring (Re-Inspection, Ongoing Monitoring, Taking Over Management (Interim Management Orders (IMO), Final Management Orders(FMO))
- 3.6 Reporting Outcomes
- 3.7 Supporting Tools and Strategies (Training and Accreditation, Financial Assistance)
- 3.8

Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33
Band E	£	22.33

2.0
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2.0
1.8
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0.3
0.2
10.6

£ 44.66
£ 44.66
£ 22.33
£ 22.33
£ 44.66
£ 99.14
£ 11.17
£ 6.70
£ 235.64
£ 1,034.9

Sub Totals for Housing Enforcement
3 section total

Thurrock's proposed fee levels were benchmarked against schemes in Southend-on-Sea City Council, Southwark, Lambeth, Peterborough, and Waltham Forest. Variations between councils reflect local operational costs, housing stock profiles, and levels of non-compliance. We benchmarked the license fee against the council's mentioned above, noting down the rate setting year and adjusted for inflation to compare accurately.

At present, no multi-property discount is proposed, as each dwelling must be assessed and monitored individually. However, the Council will review its fee structure after the first year of operation to ensure it remains proportionate and transparent.

Under Part 3 of the Housing Act 2004, each self-contained unit let as a separate dwelling requires an individual license, regardless of whether properties are under one freehold title or common management. This ensures compliance standards and inspection outcomes are recorded per dwelling.

4. Communication, Transparency, and Implementation

The Council has met all statutory consultation and publication requirements. Following Cabinet approval, the Notice of Designation has been published on the Council's website, its public notice board and in local media.

The council has published the selective licensing consultation results on its engagement portal and notified the result to those who took part in the survey.

The Council is committed to raising awareness ahead of implementation through a communications campaign across social media, the resident newsletter, and direct mail. This will ensure landlords, agents, and residents are fully informed before the scheme becomes enforceable on 5 January 2026, although the ability to apply for and be

granted a License is now open and can be accessed through this link [Private Housing | Thurrock council](#)

5. Value for compliant landlords

The scheme is designed to protect responsible landlords by tackling poor property management and substandard accommodation that undermines the wider sector. Improved standards, enforcement against non-compliant landlords, and enhanced local reputation are direct benefits of a regulated market.

6. Differentiating compliant landlords

Compliance inspections will be risk-based, focusing resources on landlords with a history of poor management or previous enforcement. Responsible landlords will receive streamlined renewals and proportionate inspection frequency.

7. Tenant Impact & Communication

- FAQ statement on rent levels

The Council's FAQs accurately state that the licensing scheme does not directly regulate or increase rent levels. While landlords may lawfully adjust rents over time, this is not an intended or automatic outcome of the scheme.

- Influence on consultation

There is no evidence that this clarification misled respondents. Consultation responses reflected a broad range of views from landlords and tenants alike, with balanced representation across stakeholder groups

8. Governance and Future of the Scheme

The forthcoming local government reorganisation into Essex unitary councils has no immediate bearing on the scheme's designation or operation. Any future structural changes will be managed in accordance with transitional legislation.

- License duration and refunds

Licenses are valid for up to five years, in line with national guidance. Should governance changes occur during the license period, licenses and associated fees will remain valid unless superseded by new statutory arrangements. Refunds are not currently provided, as costs are incurred at the point of application and inspection.

9. Coordination with neighbouring councils

The council is a member of the Essex Private Housing Group which provides a forum

for local authorities to share best practice, discuss emerging legislation, and address common housing issues. This collaboration supports a coordinated regional approach to improving standards in the private rented sector.

As part of this work, Thurrock has consulted with neighbouring authorities, including Basildon and Southend-on-Sea, to ensure consistency in approach.

Presently Southend on Sea City Council operates an established selective licensing scheme, details of which are set out below for reference

[Background – Selective Licensing Scheme – Southend-on-Sea City Council](#)

While Basildon Council are exploring the feasibility of introducing a similar licensing scheme within its borough.

10. Deferral of implementation

Cabinet approved the designation and implementation date of 5 January 2026. The scheme will therefore proceed as planned.

11. Implementation & Oversight

- Compliance monitoring and contact

Compliance will be monitored through planned inspections, intelligence sharing, and ongoing liaison with landlords. The Selective Licensing Team will liaise with the landlord during their customer journey as a point of contact for advice and inspection scheduling.

- Use of license income

All revenue from license fees is ring-fenced exclusively for administration, compliance, and enforcement activities within the scheme, as required by the Housing Act 2004. Funds will not be used to support general Council expenditure.

- Measuring success

Performance will be measured using defined indicators, including:

- Percentage of licensed properties inspected with the scheme period
- Reduction in Category 1 hazards.
- Reduction in complaints related to private rented housing.
- Improvement in compliance rates.
- Percentage change in ASB incidents reported in PRS licensed properties.
- Percentage of PRS properties licensed within the designated areas.

- Percentage of landlords attending our landlord forums.
- Percentage of tenants reporting improved housing conditions.
- Percentage of residents feeling safer in their homes/neighbourhoods.

Annual performance reports will be presented to Cabinet and published on the Council's website to ensure transparency and accountability.

Finally, the Council recognises the commitment of responsible landlords such as yourself who already maintain high standards of property management. The aim of the scheme is not to penalise compliant landlords, but to ensure consistent quality and accountability across the private rented sector as a whole.

Should you wish to discuss your individual properties or require guidance on licensing requirements, please contact the Selective Licensing Team at the following email: selectivelicensing@thurrock.gov.uk.

Decision

As outlined above, I have been unable to identify a service failure on this occasion and your complaint is therefore not upheld. However, I have made every effort to answer the issues that you raised with the Council in one concise response.

Whilst, I appreciate that this is not the outcome that you were looking for, I would ask you to please accept my assurances that your concerns have been taken seriously and have been thoroughly investigated by the Council.

It is always disappointing to learn when the services that we provide fail to meet the expectations of any individual and I would like to take this opportunity to thank you for taking the time to bring your concerns to our attention. It is through feedback, such as you have provided that we can continue to improve the level of service that we provide.

Next Steps

If you remain dissatisfied with this response and feel that consideration should be given to escalating your complaint to stage 2 of the Council's complaints process, please let me know your reasons so that these can be considered. We will then review your request and contact you regarding next steps. The Complaints Team can be contacted on the details below:

Email: complaints@thurrock.gov.uk

Post: Complaints Team, Thurrock Council, Civic Offices, New Road, Grays, Essex RM17 6SL

The Local Government and Social Care Ombudsman

The Local Government and Social Care Ombudsman Service may be able to assist you with your complaint by allowing you the opportunity to engage with the Ombudsman's dispute support advisors. If you need to contact the Local Government and Social Care Ombudsman their contact details are below:

Phone: 0300 061 0614

Website: [Contact us - Local Government and Social Care Ombudsman](#)

Useful Information

The Council's Complaints procedure can be viewed via the following link: <https://www.thurrock.gov.uk/how-to-complain/overview>

The Local Government and Social Care Ombudsman's Complaint Handling Code can be found on their website: <https://www.lgo.org.uk/information-centre/information-for-organisations-we-investigate/complaint-handling-code>

Yours Sincerely,

Dulal Ahmed

Private Sector Housing Regulation Manager