

Thurrock Council
Civic Offices
New Road
Grays RM17 6SL

23rd October 2025

For the attention of:
Dr D Smith - Chief Executive Officer

Re: Proposed Selective Licensing Scheme for Private Rented Properties

Dear Dr Smith,

I write regarding Thurrock Council's proposed Selective Licensing Scheme. Despite being one of the largest private landlords in the borough, I was totally unaware of the proposal until very recently. I now discover that a number of other major private landlords and letting agents, collectively representing over 3,000 tenants, were equally unaware. Included in their number is the largest letting agent in the area, Griffin, with over 2,000 rental properties. This raises serious concerns about the adequacy and transparency of the Council's consultation and communication processes.

It is my understanding that local housing authorities are required to ensure wide and effective publicity when consulting on such schemes. Yet, of the 140,000 adult residents in Thurrock, only 207 individuals responded - just 0.15% of the population. Independent research confirms that consultations with less than a 5% response rate are statistically unreliable due to non-response bias. Furthermore, there appear to be inconsistencies in the survey data. Some questions were duplicated but yielded contradictory responses, suggesting confusion among participants and further seriously undermining the consultation's credibility.

The supporting document titled 'Evidence for Consultation' contains little verifiable evidence - only unsubstantiated percentages and conjectural language such as 'estimated,' 'likely,' and 'potentially linked to.' Equally concerning, and quite damning, are grossly misleading statements in the FAQs suggesting landlords cannot pass costs to tenants, which is inaccurate and contrary to government guidance. The Government's own Guide for Local Authorities explicitly recognises that licensing costs are often passed on to tenants and warns councils to fully consider these potential economic impacts, both on landlords and tenants, when considering implementing such a scheme.

My own properties are inspected every six months, maintained daily, and managed by a nationally accredited agent. It is unclear how the Council's licensing process would improve upon such existing high standards. The Government guidance further stipulates that a designation should **only** proceed where it will **significantly** assist in achieving its stated objectives. Based on the available evidence, I strongly question whether this scheme will provide a better living environment for my tenants than that which already exists. The scheme will not, therefore, significantly assist in achieving the objectives and should be rejected.

Figures show that the number of social housing tenants in the lower income quintile is double that of private tenants. Deprivation and antisocial behavior are statistically more prevalent in the social housing sector than the private rented sector, yet this is not reflected in the Council's evidence base. The licensing scheme will be exclusively applied to the private rental sector; any evidence of antisocial behaviour and deprivation must, therefore, be evidenced specific to that sector. Without disaggregating data by housing type, it is impossible to conclude that the proposed scheme will address the issues it claims to target.

Local housing authorities are required to publish a notice of the designation once it has been confirmed, together with a notification to all those consulted. I can find no evidence that the required public notices have been published or that all consultees have been notified within the statutory timeframe. I conclude, therefore, that the scheme has not yet been confirmed. I would appreciate clarification on what steps have been taken to ensure borough-wide notification at least three months before commencement.

The proposed licensing fees are disproportionately high compared to neighbouring authorities, with no transparency regarding their calculation or provision for multiple-property discounts. Moreover, with potential local government reorganisation into new Essex unitary councils, there is no guarantee that fees paid upfront will be honoured or refunded if the scheme is discontinued.

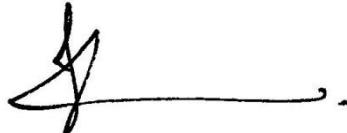
The justification for this scheme is weak, and the consultation process is deeply flawed. It is important, therefore, that Thurrock council defers or reconsiders implementation of this scheme until:

- The consultation process has been reviewed for accuracy, fairness, and credibility.
- Appropriate concessions are introduced for compliant landlords, including multi-property discounts.
- All private landlords and tenants are formally and directly notified.
- Adequate notice is provided for landlords to prepare or adjust their portfolios.
- The implications of the proposed Essex unitary authority restructuring are fully considered.

This letter follows my previous correspondence of 13 October 2025, including a formal question submitted for the Council meeting of 22 October. As no acknowledgment or response has been received, and given the denial of delivery despite confirmed proof, I must now consider this a formal complaint against Thurrock Council.

I look forward to your written response within ten working days.

Yours sincerely,



S. A. Boyling
Montana Property Development Co. Ltd