



Northern Ireland  
Assembly

Committee for Social Development

# OFFICIAL REPORT (Hansard)

Houses in Multiple Occupation Bill:  
Residents' Associations

5 November 2015

# NORTHERN IRELAND ASSEMBLY

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**Members present for all or part of the proceedings:**

Mr Alex Maskey (Chairperson)  
Mr Fra McCann (Deputy Chairperson)  
Mr Jim Allister  
Mr Roy Beggs  
Ms Paula Bradley  
Mr Stewart Dickson  
Mr Sammy Douglas  
Mr Phil Flanagan  
Mr Adrian McQuillan

**Witnesses:**

Mr Tony McGuinness	Belfast Holyland Regeneration Association
Ms Bríd Ruddy	College Park Avenue Residents Association
Ms Eileen Sung	Sans Souci Residents Association

**The Chairperson (Mr Maskey):** I formally welcome Bríd Ruddy, Eileen Sung and Tony McGuinness. You are all very welcome. I have not seen some of you in a wee while, but there you go. You very patiently waited throughout the earlier evidence sessions, so you will be aware that there are commonalities across all the submissions. That is good and proper. Coming from the areas that you do, you unfortunately have a lot of very direct experience of and evidence on the matter, so, clearly, you are experts on it. I hand over to you to make your presentation to the Committee.

**Mr Tony McGuinness (Belfast Holyland Regeneration Association):** I will start off, because I want to talk about the proposed definition of a "house in multiple occupancy" (HMO) . The 1992 definition is much stronger because it includes the building, if there are flats in it occupied, as a HMO. Under the proposed new definition, you will not be able to access the building to inspect the flats, so you cannot inspect, carry out notices or enforce. We are very concerned about that, partly because a lot of the houses in the Holylands have been converted. According to the Housing Executive, which has not made a submission, there are only 6,500 HMOs at the moment. The figure has dropped 6,000 from the original figure of 12,500, because those 6,000 are flats. The Housing Executive has therefore already started to implement the proposed definition, yet antisocial behaviour is just as bad, if not worse. The fire risks are the same as those in flats occupied as HMOs, but they are not being regulated. Our concern is that that will be repeated. The 1992 order covers the building, but the Bill does not.

We are very concerned that that affects not just our human rights but those of the occupants. When landlords took a human rights case in 2005, Judge Girvan said that it was fundamentally a bad scheme because it did not take account of article 1 of protocol 1 to the European Convention on

Human Rights (ECHR). The Bill certainly does not take account of it; rather, it totally disregards the need for it, and that is our major concern. I think that you have already been referred to that point by other submitters.

Another point to make is that there are going to be 7,000 student bed spaces in the city centre. That potentially means 7,000 students leaving the Holylands, yet there is a proposal to have the over-provision test discounted at the renewal period. In five years' time, the Holylands will hopefully be empty of students, and there will be nobody to replace them. I know that the council is trying to regenerate the area, and that would present a major opportunity.

My other point relates to satisfactory management arrangements. You cannot have satisfactory management arrangements unless you examine tenancy agreements to make sure that there are no unfair terms in them and that there are clauses included relating to antisocial behaviour. We submit that that needs to be included in the Bill.

**The Chairperson (Mr Maskey):** OK, Tony. Thank you for that.

**Ms Eileen Sung (Sans Souci Residents Association):** Sans Souci Park in the Malone conversation area is a tree-lined horseshoe of Victorian and interwar stock, housing mostly families and singles, and 50 older people in a purpose-built development. Therefore, we are a diverse residential neighbourhood. We are bounded on two sides, and on the Malone Road, by 2,400 student places in purpose-built apartments and HMOs that are managed by Queen's University. Our community needs to work constantly with relevant bodies and elected representatives to contain noise, antisocial behaviour and littering on the Malone Road. We recognise the importance of planning and HMO strategies, which help maintain core character and residential amenities and a balance between family and high-density housing. We value housing regulation, which guarantees decent living standards and makes landlords and managers accountable. We hope developer credits will never be used to sidestep any of those essential controls.

I want to raise points on overcrowding, standards for outdoor space and implications for planning policies and housing densities. I apologise for reading, but I know that your time is valuable. Section 325 of the Housing Act 1985 applies in England and Wales and provides that there is overcrowding when two or more of the persons living in a HMO who are 10 or more years old and of opposite sexes, not being persons living together as husband and wife, have to sleep in the same room. Children under 10 may be disregarded. You have already heard evidence on that. The proposed room standard in clause 42 is more relaxed and permits a child of up to age 13 — three years older — to sleep in the same room as a cohabiting couple or an adult of the other sex. Northern Ireland already legally allows sharing up until the age of 12. I do not understand how, in 2015, our housing legislation is so worded that it implicitly allows a child to share a bedroom, other than with children in the same family or unless it is a very young child with its parents.

The space standard introduced in 1935, which is still in operation in England and detailed in section 326 of the Housing Act 1985, answers Phil Flanagan's question from earlier. It means that a HMO is overcrowded if it houses more than a maximum of two people to every room available as sleeping accommodation. The Bill has no such limit and readily lends itself to dormitory-style HMOs and the exploitation of migrants. For the purposes of the space standard, a child below the age of one does not count, and a child between one and 11 is half a person. In England and Wales, the child between one and 10 counts as half a person. The Bill provides for but does not require height standards, and it uses "may" instead of "will" at clause 43(6). Under enabling regulation for suitable and adequate ceiling heights, current Housing Executive standards here require any area of sloping ceiling, where vertical height is reduced to less than 1.5 metres, to be excluded from the computation of the floor area of the room. In summary, the Bill's space and room standards for overcrowding are significantly lower than they are here and now and significantly lower than anywhere else in the UK.

Nowhere in the UK is there consideration in HMOs for standards for outdoor space, so it is a national issue. Research evidence proves that many people want and aspire to having outdoor open space around and between their home. DOE's strategic planning policy statement, published in September 2015, states:

*"The need for adequate private, semi-private and public amenity space is a prime consideration in all residential development and contributes to mental and physical well-being and the strengthening of social cohesion. Such considerations are particularly important in mixed use or high density schemes".*

We are also dealing with students, 40% of whom come to university with some sort of mental illness history. We are condemning them to HMOs with no outdoor space, and we are not doing anything about it. The Bill sets no standards for outdoor space, even for drying washing, and no standards for green areas. I suggest that the Bill potentially contributes not only to environmental degradation and litter but to stress and antisocial behaviour, with inadequate provision for outdoor spaces to socialise and play, and flooding, where gardens and green space that provide natural drainage for storm water are removed and larger areas overdeveloped.

I will finish very quickly, I hope. There are gaps in the legislation. Regarding clauses 1 and 4, as you have already heard, the redefinition of HMOs removes swathes of HMOs from the current definition. I suggest that, rather than addressing issues of housing density, the Bill is just legislating them away. Many houses, such as managed university student accommodation, flats and bedsits will fall outside the Bill's new HMO definition, as will rented apartments, including large-scale, high-density rental development blocks, bedsits, residential homes, which are already outside the definition, and other high-density housing.

I suggest that it is appropriate for discussions in Committee about the Bill to require consideration of its consequential impacts. Those include planning policies; for example, policies that protect the physical state and physical enjoyment of residential neighbourhoods. Local HMO strategies are intended to provide a planning framework that protects and, where appropriate, enhances the natural and man-made environment. I am paraphrasing the Belfast HMO strategy there.

An estimated half of existing HMOs will disappear under the Bill because of the new definition and extensive schedule 1 exceptions. Under consequential provisions, the new definitions of what is and is not a HMO will read across to planning legislation and policies, so HMO densities will appear to have been reduced. Will there then be a gap that will be filled? Will there be a review/ re-registration exercise to bring areas up to the 30% upper limit for conversion to HMOs in specified areas?

I suggest that the Bill will open the stable door in south Belfast, erasing the current density controls that not only provide safety for the tenants of HMOs but for residents in the area more generally. I suggest that the overall strategy for managing and delivering housing density needs to be considered as one of the consequential impacts, particularly in the context of south Belfast.

Regulation of HMOs needs to take account of homeowners and the impact on residential neighbourhoods. I could probably go on far too long about that, so suffice it to say that I have particular issues, and they are nothing to do with the management of university accommodation. I know that it is well managed internally, and Queen's Elms, for example, is an exemplar of good management. However, the problems are what spills out, and the density of students living, for example, in Queen's Elms on the Malone Road means that there are the problems of litter, noise, and so on.

In England, universities have successfully argued that to license large-scale student accommodation would be a logistical nightmare and incredibly expensive. Therefore, we propose to follow suit and remove purpose-built managed student accommodation from the definition of "HMO". However, in Scotland, the Scottish Executive have developed a scheme known as verification by licensee's declaration, which local authorities may use. Each landlord has to qualify for the scheme by establishing a good track record, maintaining standards and complying with licensing conditions. It is a much lighter twin-track approach. There are also examples of multitrack approaches. Basically, there may be value in reviewing a twin-track scheme for high- and low-risk HMOs here.

I want to talk briefly about information, because that is a problem that residents face. In 2011, 25% of private-sector tenants in a then University of Ulster survey had no written record of their rights and responsibilities or those of their landlord; 49% of tenants did not know where to go for information on their rights; and residents did not know where to go if there were problems with HMOs. My association is a member of Partners and Community Together (PACT), which is chaired by Belfast City Council. We contribute to the Queen's neighbourhood forum. We can also take our issues to the South Belfast Partnership Board. However, we do not know whom we go to if we have a problem with a particular property. We cannot find out who the landlord is. We do not who the landlord is, and every agency that we go to says that it is somebody else's problem.

Residents need to know what, if any, their rights are when HMOs cause summertime dumping in back alleys, constantly overflowing bins in the street, noise, antisocial behaviour, and traffic and parking congestion. We are being told that residents' parking schemes are the answer. Why should residents

have to pay for parking schemes, get residents' badges and have the HMO next door with 10 students entitled to maybe multiple residents' badges?

**Ms Bríd Ruddy (College Park Avenue Residents Association):** And 10 parking spaces.

**Ms Sung:** That is just not right.

In summary, we are concerned that the Bill lowers amenity and living conditions for HMO residents, tenants and the locality and removes landlord accountability. Its definitions risk overturning planning controls on density, and it does not give appropriate consideration or due weight to sustainable development.

**The Chairperson (Mr Maskey):** OK, Eileen, thank you for that.

Bríd, are you happy enough?

**Ms Ruddy:** Yes, thank you, Alex. I think that every one of you has a copy of the Wildflower Alley leaflet. I sent that because it brings all the issues down to a case study. I am the chair of the College Park Avenue Residents Association. We are one of the last areas of long-term, settled neighbours. Some of our people living there were brought up there. We are a very settled community and want to remain that way. However, 90% of properties in the area are HMOs, and that impacts very negatively on us, with car parking being one of the issues. All the issues that Eileen raised about Sans Souci Park really impact on our quality of life.

The Bill addresses the needs of people living in HMOs and those running HMOs, but it does not say anything about the communities affected. There needs to be a separate clause about community impact. You have multiple occupancy, and it really does not matter how you define it. You have, say, 10 people living in a house, and four cars. At the moment, because of the low price of petrol and cars, we have more students driving. That means that we have cars parked all week in the street. It is an impossible situation. No area should ever have 90% of its houses in multiple occupancy. That needs to be looked at, as do all the issues in the Bill in that context.

You are all invited to come to Wildflower Alley. As a case study, it now has worldwide fame. We did not know that such a small initiative could be seen so positively. We wanted to redress the bad publicity that we have, to show that we do have a thriving community and to show that community self-help, without any public funding, is absolutely possible, necessary and a very good thing.

We began the process ourselves. We unearthed old Belfast cobblestones. We have a brilliant project. One of the issues that is being raised here, and that we are very concerned with, is that we were opposed by nameless landlords. The secrecy of the HMO register is at variance with the principles of open and accountable government.

There is a lack of information about who owns 90% of our community. Think about it: your community is 90% owned by people, yet you do not know their names or who they are. They complained about us and our project. They wrote to DRD to complain. They refused to allow our recycling bins to be placed near their property. They refused to allow us to paint our walls. They thought that it was ridiculous that we were putting out plants.

Luckily, our group is cohesive; otherwise, we could have been destroyed by that. We are one of the most positive initiatives to arise in the area in recent years, so we will not be deflected. However, our main concern is the secrecy of the HMO register. That is not the situation in England, Scotland and Wales. There is no need for secrecy. We need to know who owns the places where we live, not least so that we can speak with them, ask them what the issues are and ask them what the problem is with developing a community. If we want sustainable communities, this is what we need to have in HMO areas: openness, accountability and cooperation. We need to find out who owns the properties. We rang Belfast City Council, which has a register, and found out that 52% of properties in the area are not registered. We then found out that the Housing Executive runs another register of HMOs, and we do not know what the situation is there, so there is confusion with having two registers that really needs to be remedied. From what I can tell from the Bill, the dual registration situation will continue. That really needs to be cleared up.

There is also the code of practice. We suggest putting in an additional part on community impact, particularly on the issues that Eileen referred to, including summertime dumping, which makes our

area look like a bomb has hit it. Unnamed people leave mattresses, furniture and things like that everywhere in our area. One word is missing from the issue of waste management, and we in Wildflower Alley have concerns about it: recycling. There could be an initiative if property owners were to begin to recycle and not to waste. We started as a very positive project to bring back dynamism to an area. We need help with that, but, as I outlined, we need help by having openness and transparency. I really hope that, as you look at the Bill, you ensure that that happens so that, first, all property owners are named and that we know who owns the properties, secondly, that there is one register so that we can see that everybody is registered and fully accountable, and, thirdly, that an additional part is added about the impact on the community of all the issues that have been discussed here: waste, noise pollution and overparking. The Bill could be greatly improved by addressing those issues.

**The Chairperson (Mr Maskey):** Bríd, thank you for that. I restate that public registration has been a Committee focus for some time, and we are conscious of it for this Bill and for the wider issue of private rented sector regulation. It has to be all-encompassing. The Committee is and has been well aware of it, and we have raised it and discussed it at length with the Department. Unfortunately, as you are aware, we do not have a resolution, but we are still working at it. I assure you that it has focused the mind of the Committee. I wanted to make that general point.

**Mr F McCann:** It is interesting to listen to the presentations because so much seems to have been left out of the Bill and the way in which it will deal with issues. I mentioned the private rented sector because I do not think that a situation would be allowed anywhere else in which hundreds of millions of pounds of taxpayers' money are going into housing benefit, and there is no regulation of that sector. We obviously need to look at that.

A couple of weeks ago, I had a meeting in my constituency about some of the things that are going on. I learned that one letting agency-cum-landlord had 5,000 properties on its books. That is bigger than most housing associations or housing providers. Those providers are heavily restricted in what they can do, yet we have a sector that has little or no regulation. We need to look at how we change that. Every time that we tried to deal with this issue and other aspects of the private rented sector, taking in HMOs, we have always had concerns. A lot of my information and knowledge came from Alex. He also spoke about the injustices of things falling street by street, and, when there was supposed to be legislation to protect it, people found loopholes and ways around it. All that needs to be taken into consideration. One thing that has probably been lost in all this is that, rather than just looking at HMOs, you need to look at the Private Tenancies Order, which is supposed to deliver. You need to look at the private rented sector all at the one time so that you come up with regulation or legislation that allows you deal with it.

I have also been concerned about what is called a light-touch approach to the sector. We need to get it out of our heads that light touch works. Look at the registration scheme: although thousands of tenancies have been registered, many have not. Although thousands of deposits have been protected under the deposit protection scheme, many have not. That goes right across the private rented sector. Listening to you, in 15 years, areas have gone from being good residential neighbourhoods to being near enough lost to the private rented sector — I get it in my constituency — with all the problems that that raises.

**Ms Sung:** I recognise and empathise with a lot of that. Tony raised some of the issues in other areas of private rented accommodation. I think that a light touch is appropriate, for example, for well-managed student accommodation. However, it should be kept on the register so that, in a sense, you have those facilities to inspect and, if necessary, enforce, but also so that there is a bit of joined-up government involving planners and others. You do not just wipe half the HMOs off the register. I do not know — I am retired, and it is not my area — but it seems to me that there is a danger of what happened previously happening again.

**Mr T McGuinness:** I will make the point that the 12,500 HMOs in 2008 in the subject plan have reduced to 6,500. In another seven years, all the other houses in the Holyland could be converted into flats. There may be no HMOs in the Holyland; they will have been totally airbrushed out.

**Ms Sung:** By the legislation.

**Ms Ruddy:** The issues are caused by multiple occupancy — too many cars, too much rubbish, too much noise — and changing the definition of an HMO will just make that worse. You will have multiple

occupancy by another name. It will be flats that will be considered private residences and be subject to no regulation. It does not stack up.

**Mr F McCann:** I made a comment earlier, and I remember being told that there were 10,000 or 12,000 HMOs; I believe that Sammy Wilson was the Minister when the last one came in. In fact, the belief was that there were more than 30,000 HMOs.

**Mr T McGuinness:** Those are only the registered ones.

**Mr F McCann:** You talk about your constituency, in and around Coleraine, or down round Belfast or many other places —

**Mr T McGuinness:** The 12,500 were the registered HMOs.

**Mr F McCann:** Yes.

**Mr Allister:** Tony, just walk me through your argument about how the redefinition has come about. I am not sure that I totally grasp it.

**Mr T McGuinness:** The 1992 Order had articles 75(1), 75(1A) and 75(2). The 1998 subject plan adopted articles 75(1) and 75(1A) and dropped off article 75(2). However, article 75(2) defined a building as an HMO if there were multiple occupancy flats in it. The 2008 one dropped that. As a result, you can have multiple occupancy flats in a building, but the building itself is not multiple occupancy.

**Ms Ruddy:** It is not an HMO.

**Mr T McGuinness:** You have no right of access to inspect and regulate the flats in it. The current proposal perpetuates that definition.

**Mr Allister:** OK. Thank you.

**Mr McQuillan:** Of all the presentations that we have had today, this one brings home the fact that the Bill is not catching what we really want it to do. Maybe the sentiment behind the Bill is right, but it is not really getting to the crux of the matter. We should take on what these people are saying, because they know best. I do not think that we should rush through the Bill. I do not know what the timescale is and all that, but I think that, a couple of weeks ago, Kevin said that we were on a tight timescale to get this through to the Assembly. There is no point in putting something through that is not right.

**The Chairperson (Mr Maskey):** Have a yarn with Mervyn privately. *[Laughter.]* Bring him round for a coffee.

**Mr McQuillan:** We need to be careful about what we do and be sure that we get the Bill right, because it is very important. This is a problem, as Fra said, up around Coleraine, Portrush and Portstewart, and we want the Bill to sort that out. You hear all the horror stories when you are out and about in the community. It is important that we get it right.

**The Chairperson (Mr Maskey):** That is absolutely right. If there were a case study — I think that this was said earlier — the experience of the representatives here from south Belfast would show exactly the way not to do these things. Quite clearly, there are a lot of good, professional landlords out there, and I have no doubt that there are a lot of impeccable properties, but there are a lot of other problems.

The essential problem, as I see it, is that there is a proliferation of rented accommodation in what used to be residential areas. That comes with a range of attendant problems, as were identified earlier. There is oversaturation, which is virtually impossible to manage, particularly during freshers' week, but that is only in student areas. When you take away the family character of an area to such an extent that you are well beyond a tipping point, you can end up with a transient population. Sometimes, those people are extremely well behaved, but, now and again, you can get a big cluster of people who will have a party week. It is OK if you have a poor neighbour once a week, once a month or every now and again, but you can have it incessantly. I have to say that my sympathy has always been with

a lot of the residents of south Belfast, insofar as their lives are being made miserable most of the time, although not all the time.

Landlords, and some very responsible people in the room today, cannot solve it all on their own. Individually, they cannot solve it themselves because the issue has just got too big; it has overwhelmed an area. We need to make sure that what I see in the Bill as further deregulation does not make a bad situation worse. I agree with your sentiment that we need to get it right. That is the purpose of taking evidence from as wide a range of people as possible. I want to assure you, and anybody else for that matter, that we take all the evidence seriously. We will study it and deliberate on it. We will then have input to the Bill, as you know.

**Mr Dickson:** Chair, I want to follow up on the sentiments that you expressed. I was particularly struck by what Eileen Sung said about the relationship between the properties and their effect on a community. I appreciate that, to a much smaller extent, given that I represent the Jordanstown area, where students are now leaving rather than living, I have seen such issues over the years. My question to the three folk here is: is the Bill fit for purpose? What should we be doing with the Bill? Is it a genuine attempt, and does it provide us with a framework for substantial amendment to allow for the types of issues that you raise? Can the issues that you and other witnesses today raised be placed in the Bill, and can we make it a positive Bill? That is what you are striving to get us to do.

**Ms Sung:** I think that that is well outwith our competence. This Committee has a number of long-standing members: your Chair, for example, has dealt with this issue over many years; you are well versed with the issues; Mr Allister is one of the best legal brains in the business —

**The Chairperson (Mr Maskey):** In the room, anyway. *[Laughter.]*

**Ms Sung:** I believe that the Committee will come to the right decision.

**Mr Dickson:** I appreciate that, but I think that the sense that we get from all the presentations today, from very technical issues to very broad issues, particularly community relationship issues, is that the Committee has a great deal of food for thought. I am interested in Adrian saying that we need to get it right rather than rush and do something that will leave you and many other people in a difficult situation. I certainly intend to take it in the direction that you are trying to drive it in.

**Mr T McGuinness:** You mentioned the word "framework". I think that the definition should be encompassing enough to provide a framework for the rest of the regulations. It does not, because it virtually airbrushes 50% of it. As is the case with the 1992 Order, it encompasses any building that has multiple occupancy, and it is not just houses but flats. To my mind, that will build a framework for the regulations.

**Mr Dickson:** What we as a Committee need to resolve at this stage or when we meet the Department is whether the intent of the Bill is to be a sleight of hand to remove all those things or is it to give us a genuine opportunity to put some of that back in to replace, improve or bring up to date appropriate regulation in it. We will have to put that test to the Department.

**Mr T McGuinness:** At the moment, anybody whom I have talked to has accused it of being a landlords' charter.

**The Chairperson (Mr Maskey):** In response to Stewart, the entire Committee Stage is about listening to evidence, bringing our experience to bear, bringing the evidence that we have heard from a wide range of people, and, as Adrian said, trying to get it right. That is what we will try to do. I acknowledge that the departmental officials are here, and they are attending all of today's sessions so that they can listen to presentations as well as reading submissions. We will have an in-depth discussion with the Department. Sammy, I think that you want the last word.

**Mr Douglas:** Thank you for your presentation. I agree with Adrian that the witnesses' experience brings to life a lot of the legislation that we are looking at. Bríd, you mentioned that, where you live, 10% of the population is made up of the local settled community. Do you have a rough breakdown of where the other 90% comes from — for example, university students and others?

**Ms Ruddy:** I do not think that there is a lot of up-to-date information. It is mainly made up of the student population, but there are increasing numbers of new communities such as Roma families and



asylum seekers. One issue for me is child protection, because we have several hundred children there in the midst of what can be known as party land. I reported incidents to Queen's on several occasions, and it has acted on it by talking to students about appropriate behaviour. It is really not a good mix.

I will touch on the residential accommodation that will be provided in the city centre. What will happen to the area? Will it be promoted as a child-friendly area, or will it still be single-person accommodation? Those little houses are well built and are good for families. What we have done in Wildflower Alley is to open up an alleyway to create play space for children and additional space for people to sit out and enjoy the quiet part of the house rather than the streets, which are full of cars. The demography is definitely changing. We are dealing with a changing area and need a strategy to deal with that, which we do not have at the minute.

Unlike east Belfast, our area does not qualify as an area of need for rebuilding roots or whatever. It just does not fit any category, and that needs to be developed. The remaining residents are definitely at risk because houses will be bought up. One of our houses — number 48 — went from being an HMO to a house with flats, so it is no longer an HMO. The house still has problems with dumping, noise and three or four cars parked outside. It is not an HMO any more; it is three flats. That is evidence of the issue that we are looking at.

**Ms Sung:** Chair, may I make a comment on that? In 2011, there was a brief BBC news item about the problems of Roma houses being overcrowded in the Holyland. At that time, the Landlords' Association for Northern Ireland (LANI) identified houses in which a number of families lived together in overcrowded conditions as requiring legislation. This Bill, basically, would legitimise that sort of overcrowding. That is to give you context.

**Mr Beggs:** I was very struck by your point that the register should be in the public domain as a useful tool to drive up standards, because it would allow those who have not registered to be identified. It would also enable absent landlords to be more accountable because people could contact them. My question is this: have you thought of any reasons why it has not been proposed to have that in the public domain, as it is in England and Wales? Why would it not be in the public domain?

**Ms Ruddy:** LANI took a case against the Housing Executive because landlords did not want their names on the register, saying that they would be fearful of intimidation. That is my understanding of it.

**Mr T McGuinness:** That was during or at the end of the Troubles.

**The Chairperson (Mr Maskey):** I suppose that the Department would cite security — I am using that generic term — safety and so on.

**Mr T McGuinness:** I make the point that, if they were company directors — they all say that they are businessmen — their details would have to be published. They would not be allowed to operate otherwise, so surely the same principle should apply.

**Ms Ruddy:** It is also very unequal, because, if we complain, as we sometimes have to, about rubbish being dumped or people building illegal parts onto a house, we are identified, and the landlords know who we are. Actually, several of them have had a bit of a vendetta against our work because we complained that they were dumping, which is illegal. We reported one to the Land Registry office because they built a huge part onto a house without planning permission. It leaves us vulnerable because we are identified, even though we are just ordinary residents, but the landlords are not identified because they have this cloak of secrecy. For us, it feels very feudal, to be honest. We feel like we are guests in our community and that these people, who own all the houses, are telling us what we can and cannot do to improve the area, because our outlook is totally positive. We think that the area will change. We think that it will be a different community and not the same community that it was. It is a wonderful place to live, and we think that, if we can get the community development right and work with people, it will prosper rather than being in conflict.

**The Chairperson (Mr Maskey):** The proposed legislation requires public registration through the councils and so on, so, obviously, we will have to revisit that and make sure that it is right.

**Ms Ruddy:** We found 600 properties that are not registered through the council.

**The Chairperson (Mr Maskey):** I completely understand that.

**Ms Ruddy:** One reason is that the council says that it is under-resourced and does not have the staff to do that. We gave it the 600 house numbers, and it is going out proactively to do it. However, it seems to be on a reactive rather than proactive basis. The HMO register, on the other hand, has a proactive approach. The Housing Executive goes out to register HMOs, but there is entire confusion over the two registers; it really is confusing.

**The Chairperson (Mr Maskey):** I appreciate that. I recall, a number of years ago, Tony being chastised by agencies for trying to collate that information. That was quite a wee while ago.

**Ms Ruddy:** The two agencies are being helpful, and we understand that the council lacks resources. At the same time, it needs to be remedied going forward.

**The Chairperson (Mr Maskey):** No other members have indicated that they want to ask any further questions. Unless you have any additional information that you want to present to us today, we are happy enough to leave this session. I formally thank you again for taking the time to do a written submission and for coming along to speak to it and to address members' concerns. It has been a good and informative discussion. You have registered your points. As I said, if we need any further information, we will come back to you. Likewise, there is a standing invitation for you to come back to us if you have any additional information that you want to give to us. On that basis, I am happy to close this evidence session. Thank you for helping us, and good luck in the time ahead.