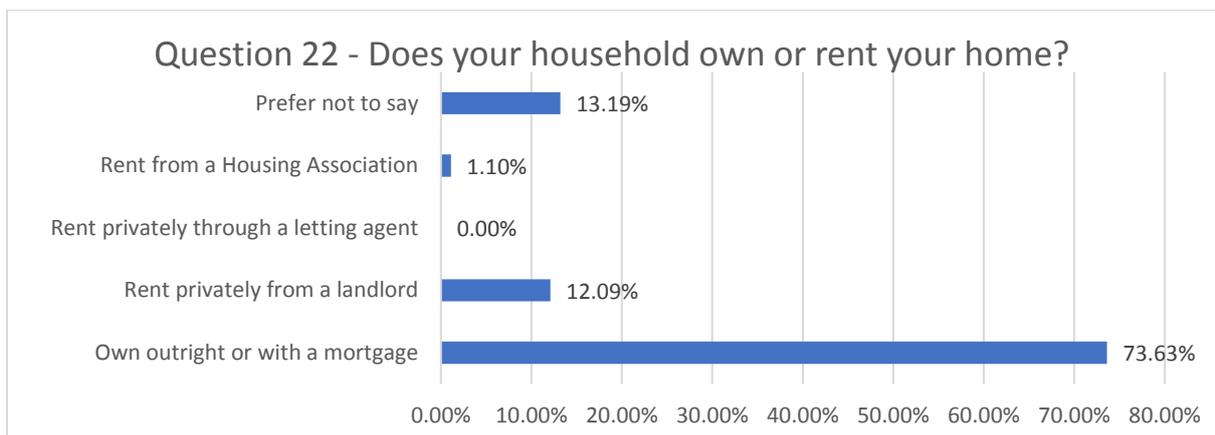
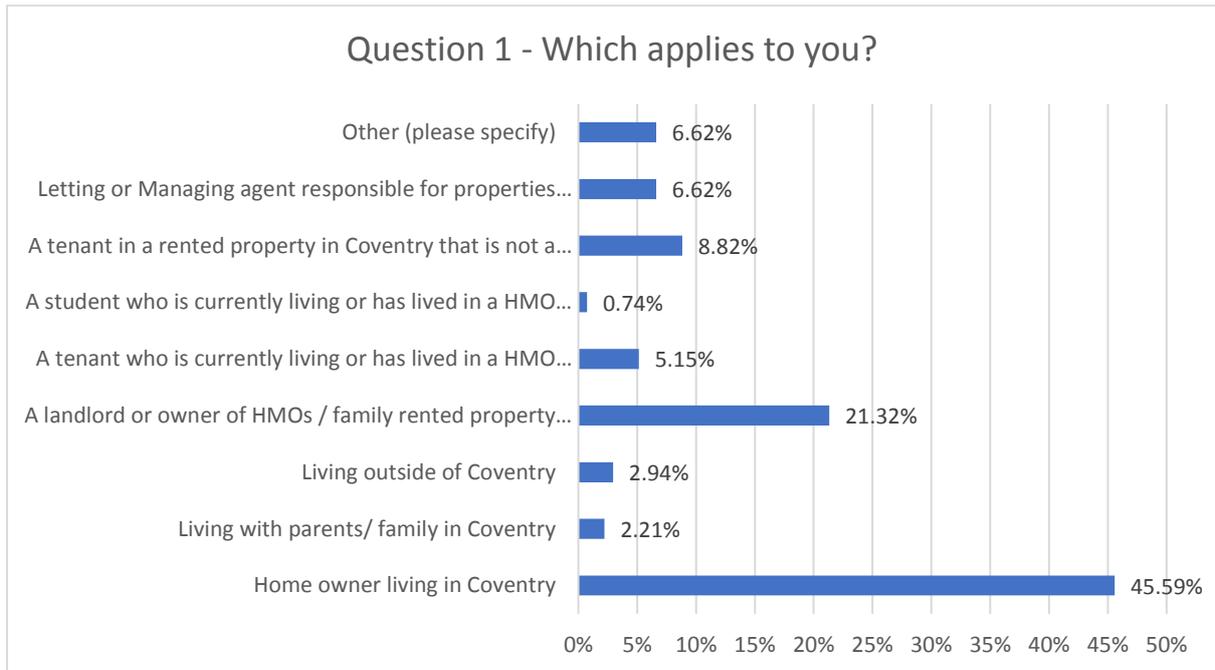


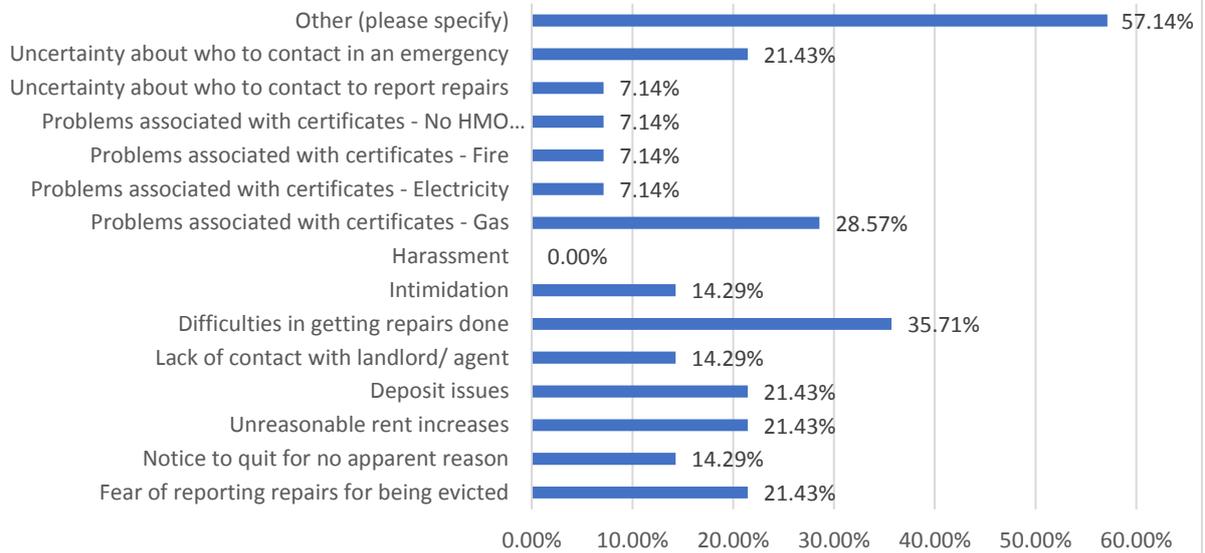
Appendix 2 – Additional Licensing Consultation Results

Online Questionnaires

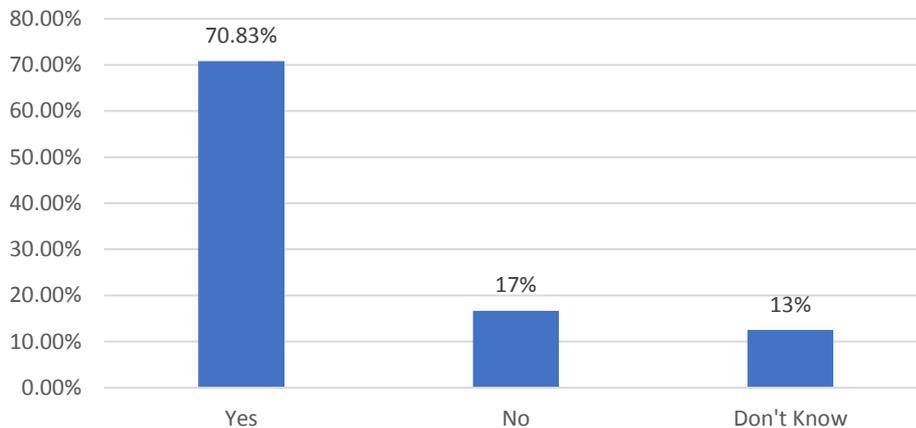
The online questionnaire consisted of 20 questions, 10 of which related to the specific proposals about Selective Licensing. The remaining questions related to ethnicity, equality and diversity information.



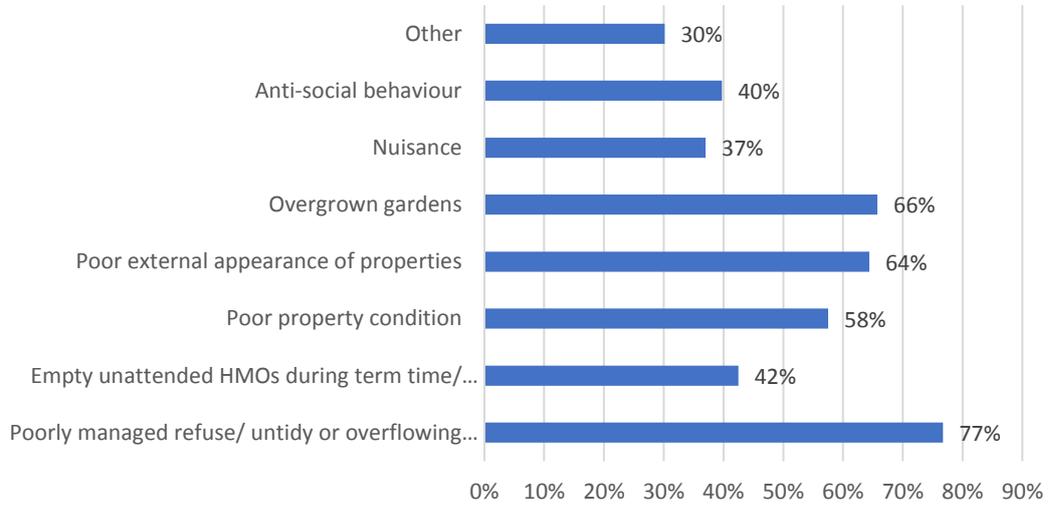
Question 2 - If you have indicated that you are living or have lived in a HMO in Coventry in the past five years then please indicate whether you have had personal experience of any of the following?(Please tick all that apply)



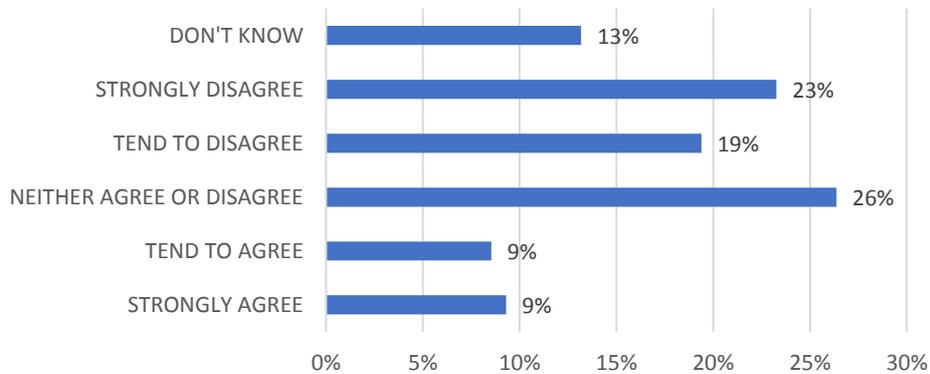
Question 3 - Are you aware of any HMOs in the immediate area where you live in Coventry?



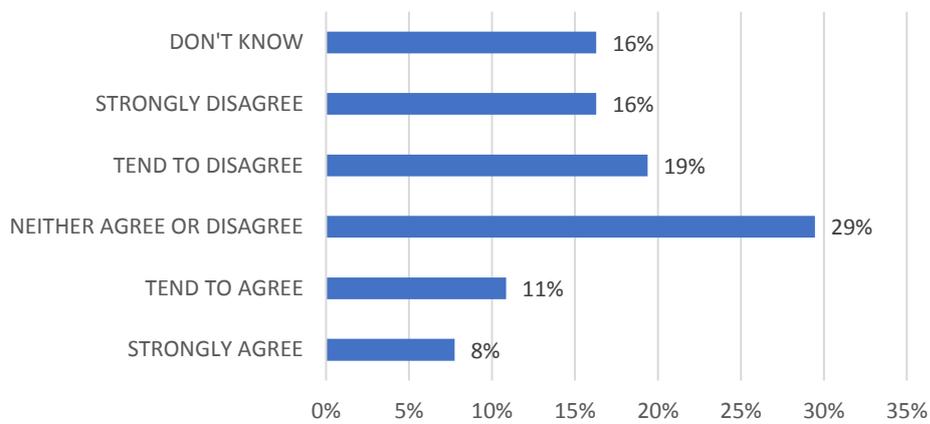
Question 4 - If you know that there are HMOs in the immediate area where you live in Coventry then have you ever experienced any of the following problems?



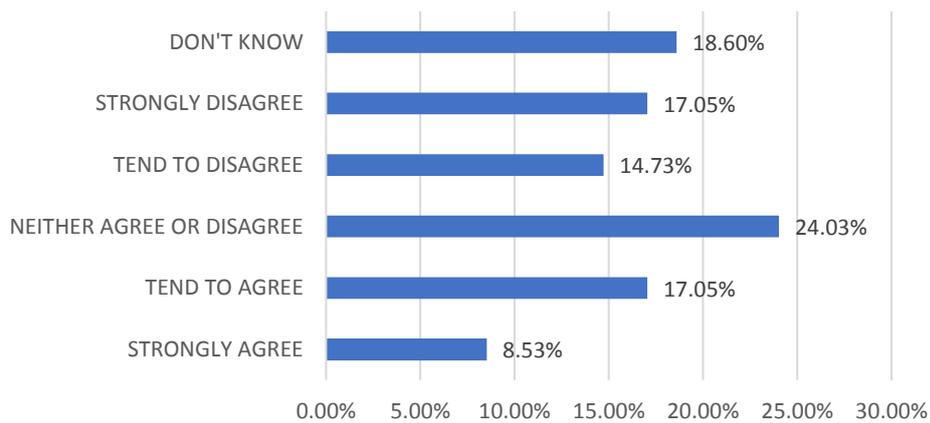
Question 5a - HMOs in Coventry are better maintained and managed than they were 5 years ago



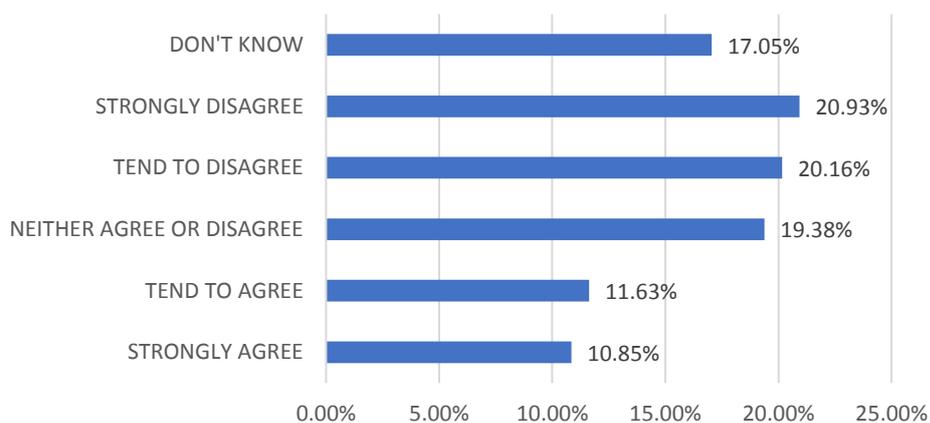
Question 5b - There is now less anti-social behaviour associated with HMOs in Coventry



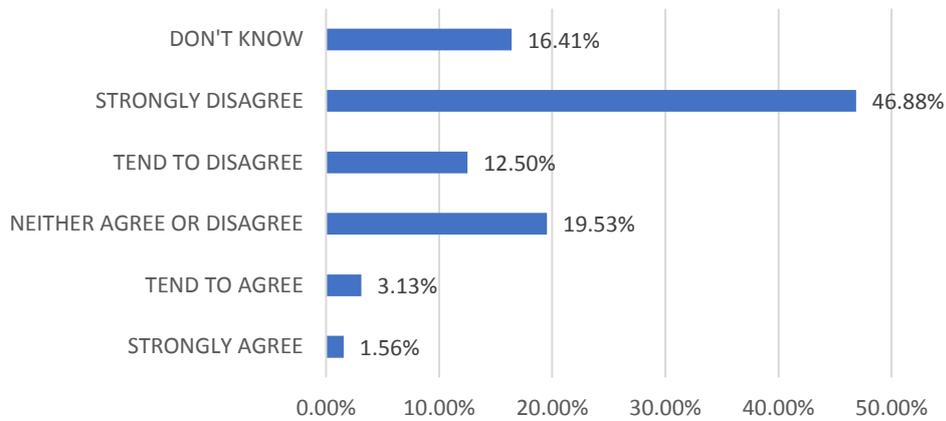
Question 5c - Living conditions in HMOs across the City have improved over the past 5 years



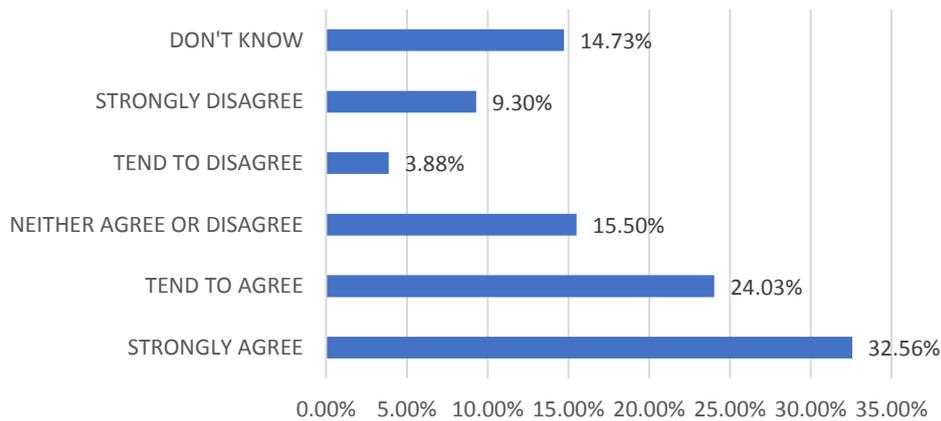
Question 5d - The management of HMOs has improved over the past 5 years



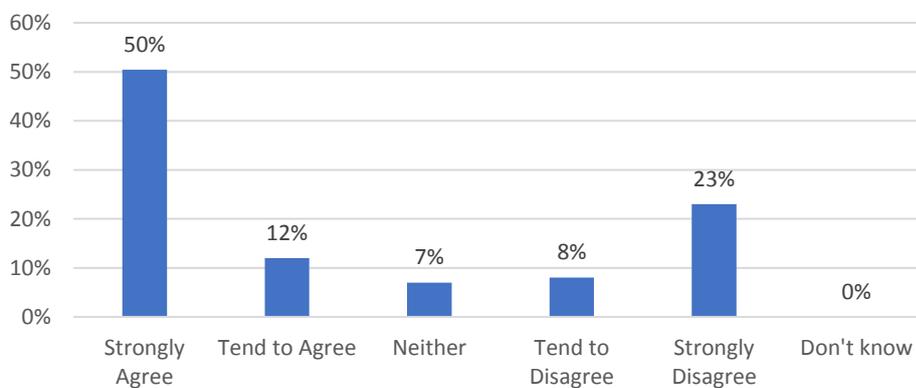
Question 5e - The number of HMOs available in Coventry has reduced



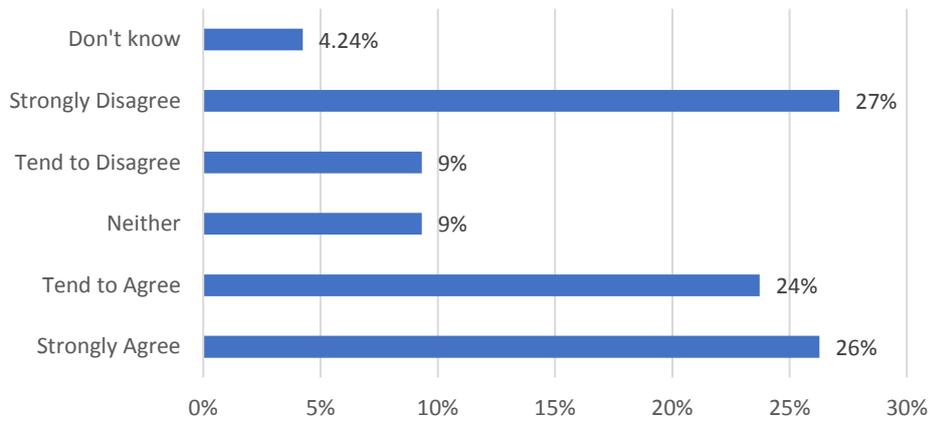
Question 5f - There are more HMOs in other parts of Coventry now than there was 5 years ago



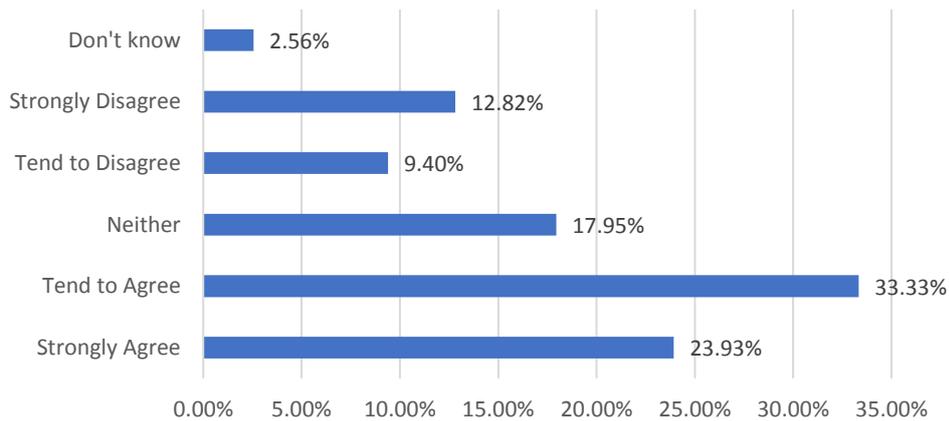
Question 6 - To what extent do you agree or disagree with the proposed Additional Licensing of HMOs?



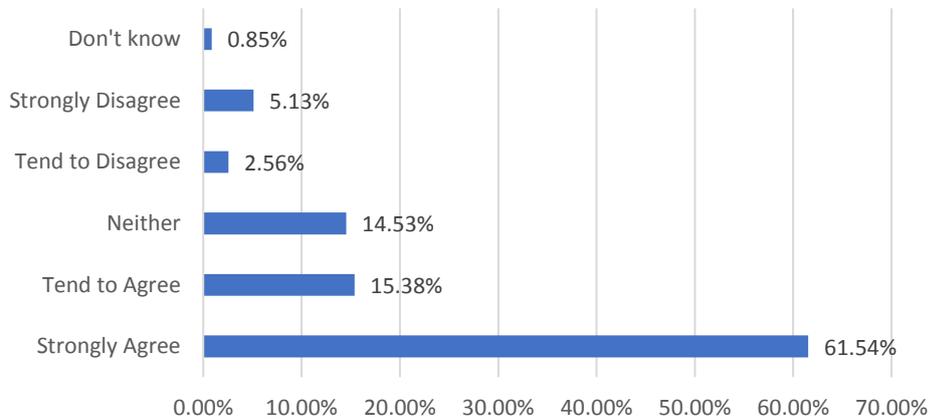
Question 7a - That this fee structure is reasonable and proportionate



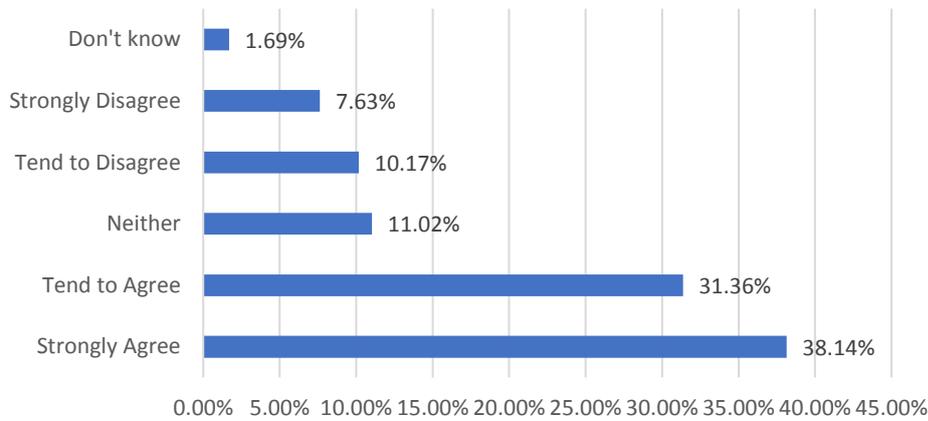
Question 7b - The Council's proposals to provide reduced fees subject to criteria



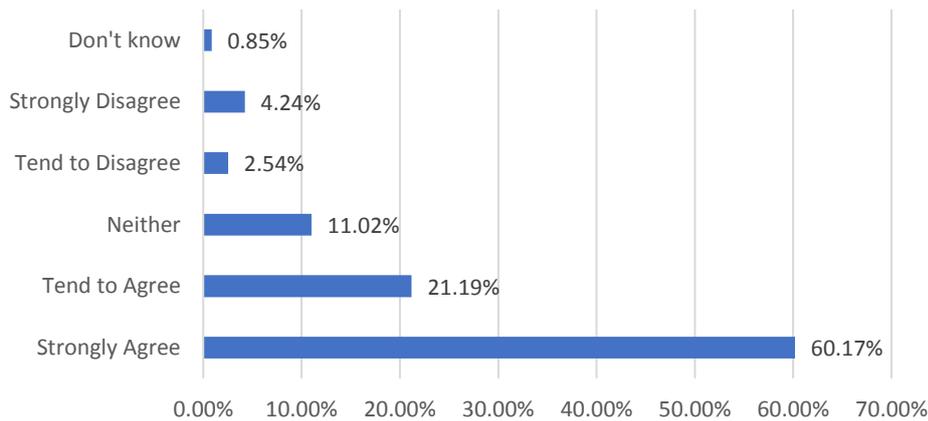
Question 7c - The Councils proposals to charge higher fees for non-compliant landlords



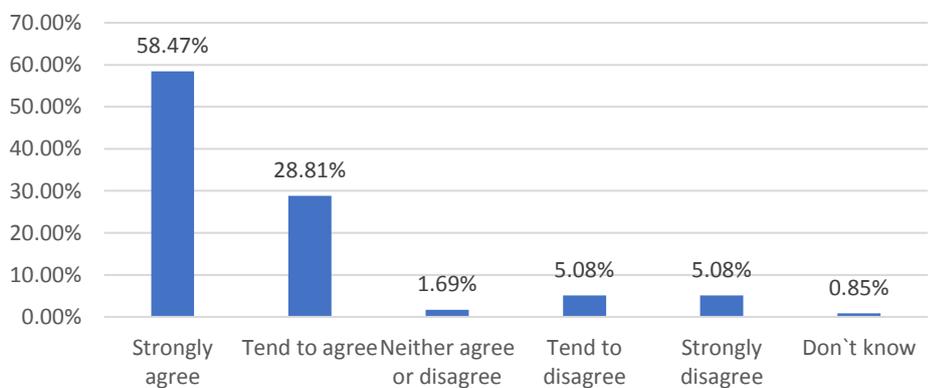
Question 7d - The Council's proposals to provide longer licences for compliant landlords

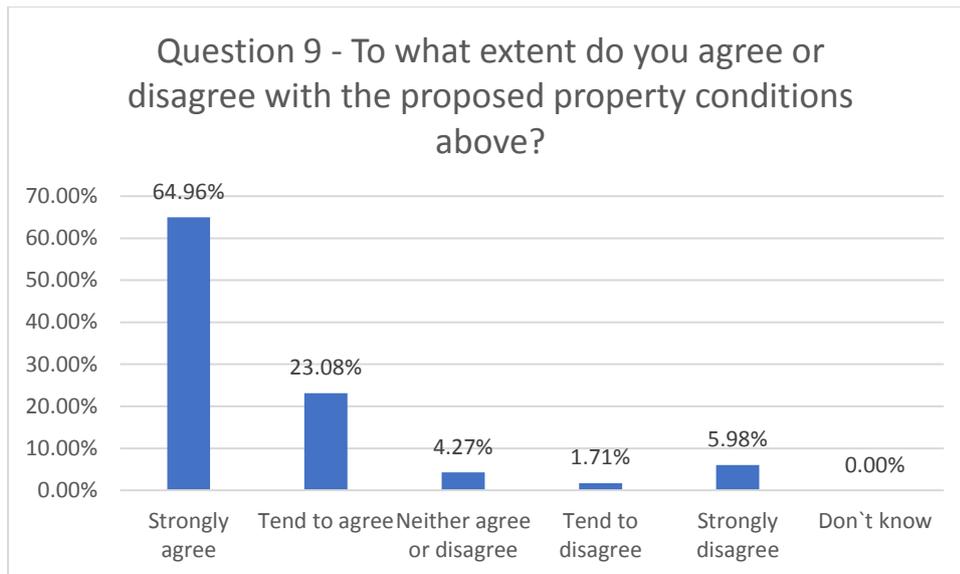


Question 7e - The Council's proposals to produce shorter licences for non-compliant landlords



Question 8 - To what extent do you agree or disagree with the above proposals for property management?





Further Comments from the online questionnaire

- 1) It is unnecessary. Making rubbish removal easier and simpler for all residents would solve many issues. 3/20/2019 11:18 AM
- 2) Non-compliant landlords should NOT be granted a licence at all never mind a shorter licence. If I didn't comply with paying council tax I'd be in a bit of bother. Landlords need to be responsible and not just raking in rent for tenants living in unsafe, tiny squalid box sized rooms. HMO's just create disharmony when surrounded by family homes in my opinion. 3/19/2019 9:30 PM
- 3) I am disgusted with the amount of HMO's in our area. We are seeing more and more family properties being ripped apart to cram as many bedrooms in as possible. The properties bring extra litter overflowing bins, issues with parking and it is so unfair to the residents. I live on Hugh rd. and since Christmas I have witnessed 2 properties (1 next door and 1 across the road) being turned into hmo's. The street struggles with parking as it is, once these houses are fully occupied parking will be a nightmare. There should be a cap on how many hmo's there are allowed in each area. 3/19/2019 8:58 PM
- 4) I would like to know why the questionnaire is mainly about HMO and not selective licensing. I do not think the questions you have asked in the survey gives a fair understanding of what individual views really are. Of course, every tenant wants to live in safe conditions. My landlord already provides this to me without having to become an HMO or Selective licensing as he already has a legal duty to make my living conditions safe e.g. gas certificates and smoke alarms etc. The council are looking to sandwich what is already legal responsibilities and call it a licence just to create revenue and jobs within the council. As a tenant I am aware if I have any issue with my living conditions, I can report this to both the landlord and the council. The council already have the powers to make sure property conditions are safe. My landlord will have no other option but to pass these charges on to myself as a tenant, which means I will not be able to afford it, I will have no choice but to move

out and find somewhere cheaper. The council say they want the best for tenants but how is this so when we will pay more in the long run. I am very disappointed in Coventry Council for trying to bring these licenses in to Coventry. 3/19/2019 10:08 AM

- 5) No - I don't own any hmos. 3/19/2019 8:51 AM
- 6) Additional fees to agents will result in rent increases 3/19/2019 8:42 AM
- 7) Licence fees will result in an increase of rent to tenants 3/19/2019 8:41 AM
- 8) As a Landlord with excessive regulation to contend with we feel exasperated that there is to be now more regulation which puts up costs and provides banana skins to trip up the honest Landlord inadvertently. All this increases cost and complexity and demonstrates a governmental organisation incapable of joined up thinking but intent on piecemeal development that will put the problems on Landlords and Tenants. As a Landlord of many years, that attempts to provide a good home for my clients, it is becoming increasingly more difficult and complex not the reverse which should be what the regulatory authorities should be aiming at. In the short term it will yet again increase Landlords costs reducing income and lead to increased rent and therefore Tenant costs which is the wrong thing to do. 3/18/2019 9:09 AM
- 9) The council from, its own assessment, will save substantial existing enforcement costs and administrative expenses, yet these do not appear to have been off set against the costs of the proposed scheme before setting the revenues. This contravenes the requirement that the council shall not make financial gain from such schemes and the scheme may therefore be unlawful. Licensing is a nice comfortable flow of extra tax revenue to pursue policy. The law abiding pays for the law breakers plus a bit for the law makers. 3/17/2019 1:39 PM
- 10) There needs to be a firm limit on the number of HMOs in residential areas. 3/17/2019 1:27 PM
- 11) No 3/16/2019 7:14 PM
- 12) No 3/14/2019 11:13 PM
- 13) I let a single house with 3 bedrooms in [REDACTED] Street under the University of Warwick management Scheme. Therefore, I already meet their standards and feel that a Selective Licence charge in these circumstances should be heavily discounted. 3/14/2019 12:44 PM
- 14) You should not charge compliant landlords the same fee for additional properties. You have accepted that the landlord is compliant and that reduces the need for check. Therefore, additional properties should be subject to reduced rates 3/14/2019 9:31 AM
- 15) It must be enforced. The issue of parking should be addressed as the properties allow several students per property to park cars, they rarely use This makes it very

hard or impossible for other residents who do need their cars day to day to park
03/12/2019 09:49

16) We live in [REDACTED], which is not included but is part of Earlsdon. Could it be included in the scheme? If it is not, then anti-social landlords might gravitate to us.
03/11/2019 08:55

17) No further HMO's should be allowed in Coventry 03/08/2019 09:48

18) Proposal is 'over the top', unreasonable and unnecessary, and will cause huge problems for people looking to rent. 03/07/2019 13:22

19) This scheme will penalise good landlords that currently adhere to all the requirements as outlined by law. It smacks of a money-making scheme for the council. Whilst I agree rogue landlords need to be supervised this scheme is not a fair one to those responsible landlords who may only have one property which they let. Those landlords would be happy to register but this should be free. A fining structure should then be introduced following inspection. In this way good landlords can continue as before without being penalised 03/05/2019 19:35

20) Seems very complicated. Also, very expensive for small private landlords. Surely rentals will increase as a result making housing even more expensive. 03/05/2019 14:09

21) Need to ensure the other nearby homes are properly consulted and have a contact number / person that they can access if there are issues. Need a council contact for unresolved issues 03/05/2019 11:49

22) This is a badly-needed initiative to keep people and communities safe and to reduce the attraction for profiteering from vulnerable tenants 03/05/2019 10:00

23) Your area is finished as a nice area once the btl people move in. 03/05/2019 09:28

24) We need housing for families not HMO the buy to let market is flooded in the St. Michael's ward. It's time something was done about the fly tipping by landlords just dumping stuff after students leave and the misuse of the parking permits in the charterhouse area. 03/05/2019 09:10

25) You are robbing the landlords. It is a city of robbery. Shame on you. Landlords have to comply the conditions by law. Why you charge extra? It is not fair. Landlords cannot improve tenants' anti-social behaviour as they don't have control over them. 2/26/2019 11:39 PM

26) I am a Landlord with 3 students living in a house in Coventry. If the council charges me a licensing fee, I will immediately pass the cost onto the students, or I will sell the property. With central government attacking landlords, and now the local council, I'm afraid many small landlords have had enough and will sell their properties. This will mean a shortage of house to rent and the big property buyers

increasing their housing stock and pushing up rents. I believe the council is about to devastate the rental market in Coventry. 2/26/2019 5:49 PM

27) Having lived next door to an HMO for over 5 years, I welcome any proposals that will make landlords take their responsibilities seriously. One lot of students were so bad I had to have a recording device in my house - they received a letter from the noise team, but it didn't really help. The garden and bins were awful, and the smell of weed was strong. They were also drug dealing and the front door was going 24/7. When they left the landlady had to completely redecorate. It nearly drove me to a nervous breakdown, 2/25/2019 9:34 PM

28) There should be more stringent conditions about neglected properties and noise and much stronger enforcement. Badly run HMOs make life a misery for other residents. It should be easier to find who the agents and landlords are 2/24/2019 11:35 AM

29) Could you limit how many HMOs there are in a street or area please? I understand people need somewhere to live but once an area becomes overloaded with HMOs any sense of a balanced community is lost because of the resulting constantly changing population. 2/23/2019 9:40 AM

30) There are too many HMOs that look squalid. Planning gets through for more without adequate parking 2/20/2019 6:05 PM

31) The proposed fees are far too low. 2/19/2019 7:08 PM

32) The outside appearance and management of HMOs should be maintained at a good standard. This will improve relationships between landlords, students/tenants and local home owners and prevent downgrading of estates such as Cannon Park. Car parking provision is also an issue in some areas. 2/18/2019 1:02 PM

33) It's surprising that the costs may rise further, this is still more costs on landlords, a balance may be when it becomes easier to evict tenants who do not pay rents. 2/16/2019 2:55 PM

34) Be careful of the additional burden and costs you are imposing on landlords. They will flee your beloved city in the end if undue restrictions are brought in. Also nowhere are landlords provided for if tenants do not pay rents and it remains infinitely difficult to evict non-paying tenants via the courts. This just appears to be a money grabbing scheme. Good luck 2/16/2019 1:51 PM

35) I strongly think that the housing benefit paid should be paid direct to landlords. So, no rent arrears occur for both landlord and tenants. It is not fair on good landlords for his tenant/s to cause them incurring debts and possible loss of their own property. And tenants to receive these monies and not use for rent and make themselves homeless. Also, this is fraud in respect, but no one seems to get prosecuted for it. Also, it would help towards stopping 3rd party lettings. Which should not be blamed on the landlord. I have never understood why the council who give these benefits for rent cannot purchase properties themselves and use

the benefit monies towards the paying of the properties i.e. mortgage or gov loans. This would then increase the council's housing needs and they could oversee the tenancy and maintaining of. If private landlords can then surely the council could. As theoretically you are paying for a property for the landlord. Which he will own outright in years to come. If I were younger, I would certainly be doing it for my investment of future/and pension pot. 2/15/2019 3:17 PM

- 36) Additional licensing schemes have been suggested in other UK towns and cities and have generally not materialised. Why does Coventry City Council think they can do a better job. A much better option would be a UK wide system governed by law that all HMOs adhere to rather than each council trying to do their own thing with their own fee structures. 2/15/2019 11:07 AM
- 37) Landlord's will just increase the rent and as usual the council are not bothered about hardship this will cause 2/14/2019 5:36 PM
- 38) My one and only concern is that these costs will be passed directly to the tenant - some of whom may not be able to pay. Renewal of tenancy agreements annually is already a cost burden. How do you propose to stop this from happening 2/14/2019 3:38 PM
- 39) The scheme would increase costs for all landlords, even the good ones. This will lead to an increase in rents and divert resources and landlord funding away from enhancing their properties 02/12/2019 10:23
- 40) I welcome the additional Licensing of HMO's in Coventry hopefully this will deter unscrupulous landlords from buying up properties to make a 'fast buck' on the back of their tenants. 02/05/2019 13:52
- 41) Target and impose fees to NON compliant landlords ONLY/ not ALL landlords who are fully compliant. Target slum landlords! 1/29/2019 3:15 PM
- 42) The Council must provide evidence that the funds raised by the two schemes are spent on additional staff and must proactively enforce housing standards including prosecuting landlords to obtain maximum publicity. 1/29/2019 9:46 AM
- 43) The extension of an additional licensing scheme in Coventry would be an unnecessary financial burden' on landlords. • The fees are too high, and would mean that landlords would have to pay for an expensive licence while criminal landlords continue to operate below the radar • The Council already has existing enforcement powers, such as civil penalties and rent repayment orders, and they should make use of these before extending this licensing scheme 1/25/2019 4:31 PM
- 44) The extension of the mandatory scheme earlier in 2018 increased the scope of licensing to a lot higher proportion of properties. The smaller hmo's that aren't currently mandatorily required to be licensed are the lowest risk. The scope of mandatory licencing already covers virtually all higher risk HMOs. 1/25/2019 1:24 PM

- 45) Introducing fees for mandatory licensing will increase rents. The costs associated have to be recouped by landlord from somewhere and it will ultimately be the tenants that pay higher rents for better standards of properties provided for by better landlords. 1/25/2019 1:03 PM
- 46) within my role at families of all Hub in Foleshill we often see unsuitable HMOs including unofficial properties that we have reported. I feel a licensing scheme would be a positive thing. 1/25/2019 10:37 AM
- 47) There needs to be a rent cap, and large developers need to also face the same criteria Across all the city 1/24/2019 11:26 AM
- 48) It looks like a further significant cost to landlords (on top of recent tax changes) which will have very little benefit to tenants as the good landlords will continue to provide good quality accommodation as that is what the market now demands. The bad landlords are the ones that need targeting. The costs proposed equate to over a month's average Coventry rent, landlords will not be able to absorb that cost so the inevitable consequence will be higher rents for tenants. This is surely counter productive? 1/22/2019 9:57 AM
- 49) The fees for Landlords who rent 1 or 2 houses to a small family or professionals should not be subject to similar fees which apply to a HMO. The Managing of properties bill should also be revised as there are many small-time compliant Landlords who are good Landlords and can personally manage their properties very well. The Licensing fees are very high which will eat into a Landlords profit, especially when considering the Taxes which they incur i.e. self-assessment etc. If licensing fees are a part of owning a property, then they need to be substantially lower than the proposal. However, I do agree with Licensing for HMOs as they are purely a scheme for money making. Whereas the private landlord with 1 or 2 houses does not earn much (especially when considering the cost of running a property). If, however, such a Landlord is not compliant then a fee should be applied. Applying a Licence fee will only put the small time Landlord off and result in them selling up. This will have a negative effect on the housing crisis and potentially render good tenants homeless. If the Licensing is for HMOs then I strongly agree that they are managed and licensed according to the proposals. 1/21/2019 9:32 PM
- 50) It's just a money making scheme, that will not be enforced. Bad landlords will ignore it. Good landlords will be more likely to leave the sector. 1/19/2019 9:06 PM
- 51) No, thanks. 1/18/2019 5:30 PM
- 52) Tend to agree with the suggestion of stiffer penalties for noncompliance 1/18/2019 2:31 PM
- 53) The proposals do not fulfil the objective of improving housing for tenants. They are designed to put the letting market into the hands of large businesses and squeeze out the smaller operators. I have one house let to 4 students, one of whom is my

son. It is probably one of the most luxurious student houses in Coventry. If I look at the criteria for a cheap 5-year licence, I see things that clearly favour large businesses such as CPD for my employees (what employees?), cleaning contracts (my son keeps the property clean), agency requirements (next to useless for the luxury end of the market, unless you are letting a large number of rooms). I can see that with luck I will always be on the expensive 1-year licence. So how do you think that reducing my profits or driving me out of the market (if you do not give me a licence) will improve housing for tenants. The large businesses will remain in the market letting out accommodation that is worse than that which I currently offer.
1/18/2019 2:25 PM

54)The proportion of HMO in residential areas should be restricted to avoid impacting the social balance of the local community 1/17/2019 4:13 PM

55)Bins in Coventry in all areas irrelevant of whether predominantly residential or heavily rented are an issue due to change in collections which is limited & refusal to provide extra bins for houses with less than 6 people living in them 1/17/2019 2:58 PM

56)It would be better to have a shorter but cheaper licence for good landlords. It seems unfair to have new landlords charged the same as known bad landlords for the 1-year licence. Can training courses not be offered to new landlords to offset this instead? It is good that places with live in landlords will not have to register unless more than 2 tenants. 1/17/2019 12:41 PM

57)Fees are so high that they will encourage landlords to circumvent the procedure. There are lots of properties in your non-priority areas where problems occur. Why not treat the whole City the same? 1/17/2019 11:43 AM

58)There should be a limit to licences and properties in areas, I live in an area that is being overrun by converted residential homes and they are ruining the area, the litter is everywhere in the streets, bins piled high and community is being wiped away. I have a family and feel like I am being pushed out. 1/17/2019 11:01 AM

59)In general, I agree with the premise of an improved scheme within Coventry. There is some confusion about if it is just for HMO properties or all residential lettings? I also believe the licence fees are pretty high and not needed for annual renewal.
1/16/2019 12:15 PM

60)Rental in Coventry will increase if additional license is introduced. It will add burden to us tenants. 1/16/2019 11:50 AM

61)In relation to the fee structures. In the interest of transparency, can we know how you have calculated costs such as salaries, office admin, etc and how many licences are envisaged to be issued / charged for. With that information provided, landlords can be assured that it is not a 'profit centre' and fully costed. Also, what programme of property inspections is being planned? 1/14/2019 5:35 PM

62)No 1/14/2019 1:26 PM

63) Needs to ensure that property management relating to key issues such as refuse disposal, maintenance of fences, gardens and the house itself is properly managed. Need to have a robust system in place to ensure that property owners submit planning applications before the house is converted to a HiMO. Once this has been done, retrospective planning applications are essentially "rubber stamped". Home owning residents need to have a dedicated Council phone number that they can phone to register complaints about a HiMO (refuse, state of property garden) and for this to be acted on promptly. HiMO owners don't pay Council tax, so they should pay a licence fee at Council tax rates in order that they support the provision of services in the City. The license fee is therefore too low.
1/14/2019 8:40 AM

64) The costs associated in this document are considerably more than those given in your Questions and Answers document i.e. a 5-year licence has a total cost of £380 with FQ&A. There doesn't appear to be any sound reasoning in the areas identified - there are some small areas that are not included yet completely all round them they are. If it's that critical then make it city wide policy. I do not agree with the policy of using landlords to improve anti-social behaviour / criminal activity - there are sufficient powers within the police force and local authority to address this and they are clearly not being used to full affect. The powers of the landlord are minimum on managing / addressing these issues apart from moving the problem on to another area or worse the trouble makers disappear completely and go off the radar. These people are often the most vulnerable within society, often with educational and medical needs - mental health. This doesn't appear to be fair and inconclusive of these individuals into society. And finally, the City Council could do more to allow landlords to use the recycling and refuse centre, i.e. by allowing them xxx passes per year. This is on two levels; I tried to dispose of some mattresses once and when I informed them I was a landlord I was informed this was commercial waste and couldn't use the centre. Secondly this attitude has stopped me being able to be proactive with my tenants; by offering to dispose of any items left at the property or even clearing up any items that have been abandoned in the street / surrounding areas. The city councils' approach is indirectly supporting fly tipping either by rogue landlords or tenants. I therefore believe there is much more the City Council could of and could do on a more voluntary basis to address some of these issues with all the parties actively working together to resolve these issues and enable the PRS to be more professional and recognised within the city. 01/11/2019 19:13

65) Overall, I think it's a good idea though landlords are being attacked from every angle right now, it also needs to be more balanced for the landlord as it seems that the tenant has all the power right now and it is only just increasing. As a letting agent we try and do our best to keep both landlord and letting agent happy yet we constantly deal with tenants who think they have issues which the landlord MUST do something about it and always fail to listen to us until we have to get the council involved, to then be proven right... also would the money spent also mean the councils HMO team would increase in size? 01/11/2019 14:22

66) Enforcement needs to be adequately financed, manned and equipped to do the job 01/11/2019 13:55

- 67) Should include requirements to ensure waste is suitably managed at properties such as ensuring suitable containers are provided for the number of people residing at each property. 01/11/2019 13:39
- 68) Not before time. With a City Planning Department unable to organise a reasonable vetting process where ALL affected by extensions are consulted and ignoring most of THEIR OWN guidelines (e.g. [REDACTED]) my area is becoming a collection of inappropriate extensions converted into HMOs. It has a deleterious effect for residents especially house owners and as one town planner commented, "building tomorrow's slums today". Examples of this abuse can be found in Sovereign, Latham and Melbourne Rd. 01/11/2019 09:36
- 69) Poor performance by Coventry City Council in allowing HMO conversions without planning permission and then allowing them once built. Bins and rubbish becoming out of control. 01/11/2019 01:23
- 70) needs to happen. I am a community nurse and have seen very bad condition affecting health 01/10/2019 21:35
- 71) I would go further and charge a holdable bond of at least £5k per property together with a 200% council tax rate payable. If the house or surround is a mess, take it from the bond - if the bond money is then used, take control of the property and auction it. There are many areas of Coventry now turning into absolute filthy uncared for tips because of HMOs (and ultimately other rented houses with absent landlords). 01/10/2019 21:07
- 72) There should be a single licensing scheme for both HMO and non-HMO properties so that landlords are not discouraged from renting to groups of friends who are not related. The fees are quite high for a landlord who is only renting out a single property. Regular houses with a live-in landlord should be entirely exempted, as they're less likely to be career landlords and are more likely to just be ordinary people trying to rent out some spare rooms for a few quid to try to make ends meet and the expense and bureaucracy would punish them unfairly. Managing antisocial behaviour is not something landlords should have to prove themselves adept at. Assuming the property is rented out to adult tenants rather than children signing the tenancies(!) then the tenants should be held directly responsible for their behaviour (by the police, council, etc.) and not the landlord. Charging landlords with a duty to play referee and regulator between tenants and their neighbours will likely result in increased discrimination against minority groups because the landlord will be afraid of losing their license if they support their tenants' viewpoint in disputes. 01/10/2019 19:54
- 73) They should be subject to regular, unannounced inspections. 01/10/2019 19:44
- 74) Probably about the most worthwhile survey you chaps have produced 01/10/2019 19:35

75) Overall a good idea but may put additional burden on good landlords without the resources to tackle bad landlords. Doesn't seem to do anything to tackle problem tenants or anti-social behaviour or unkempt (but not dangerous) property. 01/10/2019 19:32

76) because of my job role I strongly believe 'owners' & 'tenants' provide council tax info, it is very hard to enforce our legislation without the relevant info, some of these properties/tenants cause alarm to other residents especially the elderly as most are in residential streets, I see this on a regular basis 01/10/2019 19:10

77) I feel this is simply a tax on landlords. There are plenty of illegal HMOs in Coventry yet I see no action taken. 01/10/2019 18:06

78) As a tenant who is with a landlord that doesn't bother to make repairs or make them in a timely fashion - Myself and the other tenants have had to fork out money to either make amendments or put up with the conditions. Secondly, what's to stop the landlord passing on the increased fees, bearing in mind private renting is expensive as-is!! and conversely, what's to encourage the landlord to pass on the savings? (when pigs fly!) 01/10/2019 14:48

79) Because it is so easy to rent out property in Coventry (and take advantage of higher demand), many landlords have taken advantage of this to the detriment of local communities and without a concern for the loss of amenity to neighbouring property. We strongly support any action taken by the council to make it more difficult for unscrupulous landlords to take advantage of the local population's need for decent housing. We are alarmed that such a high number of houses are HMOs. As a family living in Coventry we are now planning to move out of the city to the suburbs where we will not be affected by the negative impact of the increase in HMOs in our current area. I know of several families on the street next to us who made a similar decision to when another house on their street was due for conversion. It is a crisis in Coventry. 01/10/2019 10:55

Drop in sessions

18 drop in sessions were held in various locations across the city covering every ward. The table below provides the location and the number of people who attended each session. In total these sessions were attended by 84 people.

Ward	Venue	Date	Number attended
Bablake	Hawkes Mill Sports and Social Club	13 th March 4.30pm to 6.30pm	2
Binley and Willenhall	John White Community Centre	21 st January 4.30pm to 6.30pm	1
Cheylesmore	Cheylesmore Community Centre	22 nd January 4.30pm to 6.30pm	4
City Centre	Central Library	21 st January 10am to 12.30pm	11

Earlsdon	Gilbert Richards Centre	28 th January 4.30pm to 6.30pm	5
Foleshill	St Pauls Church	11 th March 4.30pm to 6.30pm	4
Henley	Moathouse Leisure and Neighbourhood Centre	29 th January 4.30pm to 6.30pm	3
Holbrook	Holbrook Community Care Association	5 th March 4.30pm to 6.30pm	None
Longford	Bell Green Community Centre	4 th February 4.30pm to 6.30pm	7
Lower Stoke	Aldermoor Life Centre	7 th March 4.30pm to 6.30pm	None
Radford	Jubilee Crescent Community Centre	12 th March 4.30pm to 6.30pm	1
Sherbourne	Coundon Social Club	15 th January 4.30pm to 6.30pm	4
St Michaels	St Peters Centre	5 th February 4.30pm to 6.30pm	13
Upper Stoke	Stoke Heath Community Centre	18 th February 4.30pm to 6.30pm	6
Wainbody	St Joseph's Church Hall	14 th March 4.30pm to 6.30pm	9
Westwood	Canley Community Centre	25 th February 4.30 to 6.30pm	8
Whoberely	St Mary Magdalen	19 th February 4.30pm to 6.30pm	5
Woodlands	St John Vianney Church	11 th February 4.30pm to 6.30pm	None
Wyken	Wyken Community Centre	12 th February 4.30pm to 6.30pm	1

Most attendees were landlords with the remaining being tenants and residents. The main issues for those who attended related to the proposed Selective Licensing scheme and not Additional Licensing. Generally, attendees were there to seek further advice and information about the proposals whilst a small number also wanted to raise their concerns about, and support for the proposals which, in a few cases were also followed up by email.

There was a laptop made available for those who wanted to complete an online questionnaire.

In addition, officers distributed the flyer below to the members of the general public in the main city centre shopping areas for two consecutive days on the 8th and 15th March. A total of 35 people indicated that they would be responding to the consultation.

The flyer has a blue background. At the top, the title 'Have your say on property licensing proposals for HMOs and privately rented homes in Coventry' is written in large, bold, white text. Below the title, there are three paragraphs of white text. To the right of the text is a white silhouette of two houses with a chimney, and in front of them are several white human figures of varying sizes, representing a family. At the bottom left is the Coventry City Council logo, which features a stylized horse and the text 'Coventry City Council'. At the bottom right, there is white text that says 'For details visit www.Coventry.gov.uk/propertylicensing'.

Have your say on property licensing proposals for HMOs and privately rented homes in Coventry

The Council wants to improve the quality of privately rented homes and HMOs in the private rented sector.

Have your say on plans for Selective Licensing of privately rented homes and Additional Licensing of Houses in Multiple Occupation (HMOs).

Both schemes would place tighter controls on the standards of private sector landlords and the behaviour of tenants in neighbourhoods throughout Coventry.

For details visit www.Coventry.gov.uk/propertylicensing

Focus Groups

Several focus groups were held with different stakeholders. The details of these events and comments made is provided below.

Landlord's focus group

A focus group was held on the 31st January 2019 at the Council House. 30 landlords who had previously expressed an interest in being involved in any consultation events run by the Council were invited to this event and 9 attended.

The clear majority raised more concerns about the proposals relating to Selective Licensing and were not too concerned about Additional Licensing.

Agent's Focus group

An Agent's focus group was organised with the flyer being sent to all registered Agents in the city. The event was held on the 21st February 2019 at the Council House and 18 representatives from the following letting and managing agent businesses across the City attended:

Loveitts

Bairstow Eves
Payne
Matthew James Property Services
Vesta Properties
Whitegates
Connells
Alternative Estates
Cloud9 Estates
Suttons Estates
Coventry Refugee centre
Brian Holt Estate Agents
Allsop and Allsop

In the main the group were generally supportive of the proposals. There were several agents who thought the proposals were the key to making a difference. One particular agent commented in an email later that - *"I think the Coventry area has needed this for a while, with properties in poor condition, and landlords wanting premium rents without the premium properties.*

I went through a similar process some years back with the implementation of the decent homes standard for Social Housing tenants, and the private sector has needed to play catch up for a long time".

Coventry University Focus Group

3 representatives from Coventry Uni attended the meeting and submitted the following response – *"Your proposal and rational appears to attempt to address both issues as it holds landlords more accountable which is to be enforced by the team that would be created if the outcome of the consultation is in favour of the proposal that has been tabled.*

As a significant employer in the city the University is equally keen to ensure more high-quality properties are made available to our many staff who require them and I hope as a result of this, we will see an improvement not only in student let properties but in professional let properties too."

Warwick University Focus Group

4 representatives from Warwick Uni attended the meeting and submitted a detailed response.

The University provided the following response to the consultation.

13 March 2019

Mr A Chowns
Property Licensing Manager
Place Directorate
Regulatory Services
One Friargate
Coventry
CV1 2GN

Sent via email: adrian.chowns@coventry.gov.uk

Dear Adrian

Coventry City Council Proposed Selective & Additional Licensing Schemes

I am writing in support of Coventry City Council's proposals to introduce Selective Licensing and Additional Licensing in order to improve the quality of private rented housing in the City.

The University of Warwick has a student community of over 26,000 students and over 6,000 staff. Around 6,000 of our students chose to live in private rented accommodation in Coventry. We believe good quality, safe and secure housing is fundamental to our student experience and positively impacts on students' academic performance and wellbeing.

Warwick Accommodation, the University of Warwick's property management agency manages over 2,300 student bed spaces in private rented accommodation in Coventry, Kenilworth and Leamington. We ensure all the properties we manage are compliant and that all of our landlords are operating under the required regulations. We have a "Standard Requirements for All Properties Managed by the University" document and "Service & Compliance Standards", along with our detailed contract that states the high standards we expect before entering into an agreement. Our Property Managers undergo compulsory training in areas ranging from NEBOSH to fire risk assessment.

We are pleased to be working with Coventry City Council this academic year on our Student Housing Enforcement Pilot in Canley and Cannon Park. Through the University's grant contribution this project has allowed resource to carry out proactive inspections of student HMOs, helping to advise student tenants but also advising and helping landlords to achieve and maintain acceptable standards and taking enforcement action when appropriate. This work has shown some good quality student HMOs and professional landlords but has also provided evidence that some of the private rented sector accommodation our students are living in does not meet health and safety standards as well as highlighting environmental and management issues. We have received positive feedback from our students and also our local residents that this project is improving conditions in individual properties but also in the community as a whole.

Professor Simon Swain FBA
Pro-Vice-Chancellor (External Engagement)
University Executive Office
The University of Warwick
University House
Coventry CV4 8UW
United Kingdom
T: +44(0)24 7657 3380
E: s.c.r.swain@warwick.ac.uk



The proposed Additional Licensing Scheme is of particular interest to the University as this covers some of the smaller HMOs our students live in that fall outside of the current national Mandatory Licensing Scheme. HMO licensing is key to improving facilities, management and safety and by extending this to HMOs occupied by 3-4 people there will be a consistent approach and our students living in these smaller properties will have the same protection as those in licensed HMOs.

The University recognises that current Council austerity resources have resulted in prioritising reactive inspections. We have clearly seen the benefits of pro-active inspections from the work on our pilot housing project in Canley and Cannon Park. This pilot has also provided a single point of contact at the Council allowing for quick responses when dealing with concerns and we hope a similar model will be considered within new structures and resource. We are pleased to see that both proposed schemes will provide the Council with additional resources allowing for proactive management of private sector housing in the City.

Affordability of student accommodation is a key concern of ours and we worry that the cost associated with licensing fees will be passed onto our students by an increase in rent. We note from the research the Council has conducted in this area that rental values in Coventry have increased on average by 19% between 2015 and 2018 compared to 11% in the West Midlands and 8% in England over the same period. We ask the Council to do all they can to actively monitor and use their influence on rising rent costs in the City.

It is positive to see that landlord management of antisocial behaviour by tenants is part of the proposed schemes. We work hard, hand in hand with our Students' Union and local partners, to help our students to understand their responsibilities as local residents and how to be a good neighbour. We do from time to time receive complaints and concerns from local residents about antisocial behaviour from our students. We investigate each complaint received and speak directly with any of our students identified and take appropriate action. Of course, landlords also have a role to play here and a responsibility to take reasonable steps to prevent or reduce ASB by managing their property and tenants effectively but will need advice and support with this. Warwick Accommodation deal with all incidents of antisocial behaviour in the properties they manage on behalf of landlords/owners.

We are aware that the Council is looking at introducing a voluntary landlord accreditation scheme alongside licensing. We feel this will play an essential part in improving the standards of private rental accommodation complementing existing and proposed HMO licensing. Such a scheme would give our students confidence that landlords will act professionally, offer good standards and allow them to make more informed choices. The University would like to work with the Council on developing proposals around this scheme.

We would be happy to provide more input during and following the consultation if it can be of further help so please do not hesitate to contact us.

Yours sincerely

Professor Simon Swain FBA
Pro-Vice-Chancellor (External Engagement)

Landlord Forums

A total of four landlord forums were held at the Council House between 6pm and 8pm. Spaces on the 6th, 13th, 14th, and 18th March. Spaces were limited to 75 per event so that everyone attending would have the opportunity to be involved and despite each event being sold out 207 out of the potential 300 attended.

Table below provides the number of attendees for each event.

Date	Number of Attendees
6 th March 2019	58
13 th March 2019	50
14 th March 2019	47
18 th March 2019	52

Many attendees were landlords, agents and property professionals and during these sessions a presentation was provided (attached as appendix 1). The proposals for Selective Licensing were of more concern than those relating to Additional Licensing.

The suggested licence fee levels were discussed extensively in all the landlord forums and the principle of any kind of fee was raised many times in the context of the increased cost burden on landlords and possible increased rent levels for tenants.

The proposed scale of fees and different length of licence for non-compliant and compliant landlords led to many questions and requests for clarification about what type of property/landlord would qualify for these – and in particular whether, say, a landlord who, has more than one property would be eligible for a discount on multiple applications. There were also several comments along the lines of: *why do good landlords have to pay for rogue landlords*.

Ward Member's Sessions

Comments made by respondents regarding the selected areas for Selective Licensing were of more concern than the proposals for Additional Licensing. There appeared to be a consensus that Additional Licensing of HMOs can only be a good thing.

The following feedback was provided by Members during these sessions:

- An easy online form for reporting rented properties/HMOs should be developed
- A register of all licensed properties should be available online
- Please to see cluster flats for students are being looked at
- In favour but in the case of Selective Licensing would like to extend the areas
- Can we provide access to the 'tip' for landlords at the end of the Uni year to clear out – this could help reduce fly tipping
- Additional Licensing welcomed but see little need for Selective Licensing
- Charities should not be free – exempt
- Likely to be issues with family properties being rented to each other – cultural behaviours
- Concerned about areas not being included but supportive of both schemes overall
- Could the fee be related to property sizes

Scrutiny Coordination Committee

Officers presented to proposals to the Scrutiny Coordination Committee and provided the outline proposals for the group to consider and respond to as part of the consultation process.

The Committee were generally supportive of the proposed scheme and put forward the following recommendations:

- The scheme should include a plain English definition of what is an HMO, including examples;
- The number of prosecutions and enforcement actions is reported back to Members on a regular basis;
- Ensure that the complaints process for tenants is not onerous;
- That a poster or sign displaying the tenants' rights and responsibilities be part of the license requirements;
- Consider including DBS checks as part of the licensing process, as with taxi licensing; and
- Officers to continue working with ward members if the scheme is implemented.

Letters, Emails and other responses

A series of emails and letters were sent to people who had registered their details with the Council on the Gov.uk website and an email was also sent to Council employees as part of the daily intranet round up.

Several individuals and organisations (not mentioned for data protection purposes) sent their response to the consultation directly to the Council via letters and emails etc. Their main concerns appeared to relate solely to Selective Licensing rather than Additional licensing of HMOs.

Letters and Emails received

(1) Public Health submitted - *The right home environment is essential to health and wellbeing, throughout life. Key features of a healthy home include:*

- 1) *Warm and affordable heat*
- 2) *Free from hazards, safe from harm*
- 3) *Enables movement around the home and is accessible*
- 4) *Promotes a sense of security and stability*
- 5) *Support available if needed*
- 6) *Healthy neighbourhood community*

Disrepair and cold homes can cause immediate health issues to residents (such as respiratory conditions, hypothermia, risk of falls and death) and also negatively affect children's educational attainment, emotional wellbeing and resilience and put adolescents at five times more risk of suffering from multiple mental health problems. In addition, families living in overcrowded housing can be at an increased risk of mental health problems, infectious disease, injuries, breathing problems and exposure to tobacco harm.

The physical and mental effects of poor housing disproportionately affect vulnerable people; however the mental health effects are made worse for older people living isolated lives, the young, those without a support network and adults with disabilities.

For this reason, Public Health are pleased to see that the supporting information in the Selective Licensing Feasibility Report (2018) has considered areas such as fuel poverty, energy performance, thermal comfort, modern facilities, disrepair, HHSRS (Housing Health and Safety Rating System), the Decent Homes Standard, property conditions, amongst others, when identifying the geographic areas (that have poor property conditions) to be included in the selective licensing areas.

The Selective Licensing Feasibility Report (2018) identifies that selective licensing in a targeted area of the city is expected to improve physical standards and management of private rented stock which will help to reduce the health issues caused by poor quality homes mentioned above (and therefore reduce health inequalities). Public Health also support the other benefits mentioned in the feasibility report, in particular the benefits to tenants of:

- Reducing incidence of unplanned moves and homelessness*
- Economic benefits e.g. regaining deposits/less moving costs*
- Improvements to the neighbourhood e.g. security and sense of community*

The areas identified in the proposal are some of the more deprived areas in Coventry. As mentioned, improving the condition of poor-quality housing in these areas will improve the health of some residents in these deprived areas and therefore contribute towards lowering health inequalities in Coventry.

Selective licensing presents itself as an ideal opportunity for CCC to ensure that all private rented properties in the specified areas will be inspected to ensure that they reach the minimum national legislation (through mandatory conditions) and in some cases, as per discretionary conditions, to go above and beyond these requirements. Ensuring that landlords achieve certain standards of management and maintenance will help to bring about better-quality housing in the PRS (and therefore improve health outcomes).

The proposed Additional Licensing Scheme is expected to address the impact of poor-quality HMOs that fall outside of the mandatory licensing HMO definition and address management issues and poor property conditions. This will include minimum room sizes in HMOs in addition to other areas (such as fire safety) being improved to a minimum standard. Public Health welcomes acknowledgement in the Additional Licensing Feasibility Report that additional Licensing will extend and continue the process of upgrading of HMO rental stock already begun by the Mandatory scheme. Additional licensing will add a significant portion of the Coventry HMO market to the list of those houses where the Council currently is involved with licensing (and therefore, by default, involved with improving their quality). As already described above, improving the condition of the property will contribute to improving the health and wellbeing of residents of Coventry.

In the case of both proposed licensing schemes, there is theoretical risk that some rogue landlords will disproportionately increase the rent to say they are covering their extra charges. Public Health are pleased to see acknowledgement of the risk of increased rent in the consultation paperwork, along with a breakdown of the true monthly increase if the exact cost of the license was passed on to the tenant through rent.

Taking into account all of the above information, Public Health are in support of both of the proposed licensing schemes (Selective Licensing and Additional Licensing of HMO's).

In the case of both licensing proposals, if approved, Public Health would welcome the opportunity to work with the property licensing team to enable officers, during property inspections, to identify potentially vulnerable tenants in the properties. These vulnerable tenants may benefit from services such as the WMFS Safe and Well check.

(2) Dear Mr Chowns,

Selective and Additional Licensing Scheme – Consultation

In the light of the current Consultation on Selective and Additional Licensing, we are responding with these comments, rather than completing the online questionnaires which do not cover the ground we wish to cover.

We applaud the Council's intention to improve the quality of the private rented housing stock in Coventry and to remove bad landlords and we support the key priority, as outlined in the Feasibility Report, of working with landlords to provide high quality, professionally managed accommodation. However, we feel that the scheme as proposed has a deeply flawed methodology, would not work with, but penalise large private landlords such as ourselves, would be unfair in its application and would not achieve its objectives.

To put our comments into context, as a private landlord [REDACTED] now operates some 360 housing units based in the East of the City, meeting local housing needs, some let at social rents and many at considerably lower than market rents, which we regard as part of our corporate social responsibility. We provide a good level of maintenance and generally tenant satisfaction is high. Not all our stock is in the currently declared boundary for the scheme, but some 120 units are.

1. Fairness

First, the scheme is based on the principle that all landlords pay for the cost of the scheme, whether they are classified as good or bad. This is manifestly unfair. Why should good landlords pay for the cost of a scheme that is designed to police bad landlords and from which they obtain no effective benefit? Good landlords would apply for a licence, just because they are good landlords. Bad landlords would keep under the radar for years, continue to offer substandard accommodation and eventually move to other areas, which has been the experience where similar schemes have

been introduced. Thus, most of the cost of the scheme would be borne by the good landlords.

Second, much greater clarity is required on the issue of “multi-property” licences. Where one landlord operates a block of apartments, all of similar design, the only difference between them is the behaviours of the tenants. For example, ██████████ operates eighty-six apartments in six separate blocks on a site known as The Old Yard ██████████. This falls within the currently designated area. As the scheme is presently written, the bill for the initial application would be nearly £20,000. Would this be refunded if a multi-property licence were issued and what would be the eventual cost? Is it feasible that each one of these units would be inspected, with all the attendant problems of access etc., just to show that we are a respectable landlord? Most of these tenants are good, respecting the property and the neighbourhood, but a small minority are bad – creating problems and scarcely paying their rent. To emphasise the point – the only difference in these circumstances is the quality of the tenants.

2. Effectiveness – Area Selection

The scheme is designed to eliminate bad landlords and improve the quality of housing in the private rented sector. We are surprised about the designation of some areas within the scheme. Taking, again, the example of The Old Yard, we would want to know which of the six required criteria for inclusion (low demand, anti-social behaviour, poor property, high level of migration, high deprivation or high level of crime) it is said to meet? If this is typical of area selection it suggests that the process has not been carried out to sufficiently local level. A further example is the inclusion of Turlands Close, a quiet residential area in Walsgrave, which may have been included because of the proximity of the Asda supermarket with its attendant problems of shoplifting etc.

3. Effectiveness – Tenants

It is generally agreed that much anti-social behaviour stems from bad tenants. This particularly can apply to student lets, when bad behaviours occur even in properties which are managed by the universities – yet these are exempt from the scheme. Our dealing with some of these agencies suggests that they have little or no control over the activities of their student tenants and can lead to some very disturbing situations.

4. Effectiveness - Rents

If the cost of the scheme is to be borne entirely by landlords one of the major effects would be to increase rents or reduce maintenance. Both are obviously undesirable.

So in general, we think that the scheme, as it is proposed, is unfair and will be ineffective in curbing the problems that it is attempting to address. We feel that a scheme should be developed to license landlords, not properties, through a landlord register. This would reduce inspection costs to random sampling and give broader control over landlords' activities.

Furthermore, from the perspective of ██████████, if this scheme is implemented in its present form, we would have no alternative but to let properties at full market rents rather than to needy local people, something that we are very reluctant to do.

If you would like further discussion on these matters, we are available to provide any assistance that we can.

(3) NATIONAL APPROVED LETTING SCHEME (NALS)

INTRODUCTION

NALS www.nalscheme.co.uk is a licensing scheme for lettings and management agents operating in the Private Rented Sector. NALS agents are required to:

- deliver defined standards of customer service
- operate within strict client accounting standards
- maintain a separate client bank account
- be included under a Client Money Protection Scheme

Agents must provide evidence that they continue to meet NALS criteria on an annual basis, in order to retain their licence. The scheme operates UK wide and has 1500 firms with over 2000 offices.

NALS also administers the SAFEagent campaign www.safeagents.co.uk the purpose of which is to raise consumer awareness of the need to ensure that landlords and tenants should only use agents who are part of a Client Money Protection Scheme, which offers reimbursement in the event that an agent misappropriates their money. The campaign is recognised by Government and our logo appears in their How to Rent guide [How to Rent](#)

We are an accredited training provider under the Rent Smart Wales scheme and recognised by the Scottish Government as offering training which meets the requirements for agents to be included under regulation on the Scottish Register. We are also a co-regulation partner with Liverpool City Council. Recently, we have been approved by Government as a provider of the mandatory Client Money Protection arrangements that will soon come into force.

NALS AND LICENSING

NALS is supportive of initiatives such as Selective Licensing, providing they are implemented in a way that takes account of the Private Rented Sector (PRS)'s own efforts to promote high standards.

NALS believes that positive engagement with voluntary schemes and the representative bodies of landlords and agents (such as NALS) is essential to the success of initiatives such as Selective Licensing. We are mindful that the operational problems associated with lack of such engagement have been highlighted in House of Commons Standard Note SN/SP 4634.

The same note sets out how important it is for licensing schemes to avoid being burdensome. We believe that promoting voluntary schemes, by offering discounted licence fees to accredited landlords and agents, can help to achieve this. Voluntary schemes often require members to observe standards that are at least compatible with (and are often over and above) those of licensing schemes. We believe, therefore, that if Coventry City Council were to allow discounts based on membership of NALS (and other similar bodies) implementing and policing the

licensing scheme would ultimately be less costly and more effective, allowing resources to be concentrated in the areas where they are most needed.

This is a commonly accepted approach by many English Local Authorities. We would further point out that, in Wales, the Welsh Government has recently recognised the importance of membership of specified bodies such as NALS and is offering discounted fees to members as a consequence <https://www.rentsmart.gov.wales/en/>

PROMOTING PROFESSIONALISM IN THE PRS - THE ROLE OF AGENTS

NALS' engagement around the country, with various local authorities, suggests that lettings and management agents have a key role to play in making licensing, accreditation and other, voluntary regulatory schemes work effectively. Agents tend to handle relatively large portfolios of properties, certainly when compared to small landlords. They tend, therefore, to be in a position to gain an understanding of licensing based on wider experience. They become expert in trouble shooting and ensuring that the balance of responsibilities between the agent and the landlord is clearly understood. This, amongst other things, can help to prevent non-compliance due to misunderstandings about local licensing arrangements.

Furthermore, NALS ensures its members maintain certain operational standards, have Client Money Protection arrangements in place, keep separate client accounts and comply with their legal obligation to be a member of a redress scheme. We also provide training. All this can be of assistance to councils who are trying to drive up standards in the PRS.

Although agents are now required to belong to a government approved redress scheme, display their fees and publish their client money protection status, our experience to date suggests local authorities face challenges in enforcing these standards. Membership of bodies such as NALS can reduce the need for the local authority to use its formal, legal powers in these areas.

COVENTRY CITY COUNCIL'S PROPOSALS - SPECIFIC ISSUES

Proposed Licensing Area

We welcome the targeted nature of the licensing proposals.

Licence Term

We note that "reduced term licences (annual licences) will normally be issued to new landlords where they have recently acquired or converted their property into a licensable property"

In our view, very careful consideration needs to be given to the term "new landlord" when applying this rule. Is a new landlord one who is letting property for the very first time? Is a landlord letting their second property a new landlord or not?

Furthermore, a landlord could be new to the Coventry area, but not new to the profession. In our view, experienced landlords who acquire or convert a property in the licensable area should not be subject to a "probationary period of 12 months".

Additionally, we do not think that new landlords who engage an accredited agent should be subject to a probationary period of 12 months. In our view, a longer license should be issued if an accredited agent is managing the property, regardless of whether or not the agent is the license holder.

Changes in License Holder

Our experience around the country suggests that the lack of flexibility in most license fee structures can militate against efforts to establish “an alternative competent person to be licence holder/ manager” in cases where problems have been identified, often by the council. This is because accredited agents still have to pay the full fee when they take on management from a landlord (or agent) part way through the license period.

Whilst we understand that licenses cannot be “transferable” from one person to another, we would suggest that more flexibility is required than just 5 year or 1 year terms. For example, agents taking on properties part way through a 5 year term should only have to pay the 5 year fee “pro rata”.

Fee Structure - Accreditation

We note that although “all parties actively involved in managing the property (i.e. joint or sole management responsibility) must be accredited with Coventry City Council’s Landlord Accreditation Scheme (CLAS)” no discount is offered to landlords engaging agents thus accredited. As set out above, it is our view that discounts can be an important incentive to landlords who are considering engaging a reputable agent. We would urge Coventry City Council to offer such discounts.

We are also unclear as to whether membership of industry bodies such as NALS provides a “passport” to CLAS accreditation. In our view, if license holding agents are to be required to be “registered with a recognised professional association”, it would be onerous to insist on CLAS accreditation as well, unless straightforward passporting arrangements are in place.

We would urge Coventry City Council to consider offering fee discounts to:

- 3. Agents who are members of NALS or a similar recognised body (where the agent is the licence holder)*
- 4. Landlords who engage agents that are members of NALS or a similar recognised body (where the landlord is the licence holder)*

We would urge Coventry City Council to passport NALS members to CLAS accreditation.

Lastly, we would ask that NALS be added to the list of recognised professional associations.

We would suggest that NALS members and the landlords who engage them are less likely to be non-compliant and that, as a result, there would be reduced costs to the council. We would also suggest that NALS membership mitigates the need for

compliance visits to be carried out by the council. For example, the timing and content of these visits could be risk based, recognising that the risk of non-compliance is much lower in the case of properties managed by NALS agents.

In our detailed comments below we point out some of the areas where compliance with key standards is an inherent part of the NALS scheme. These are the areas where we think promotion of NALS membership through license fee discounts could ultimately save the Council money, as well as increase the take up of voluntary accreditation.

Fee Waiver – Tackling Homelessness

We welcome the proposal that, in cases where “a private landlord...is assisting the Council by offering permanent accommodation to meet...homelessness duties applications will be accepted, for the particular property being provided without a fee being payable”

In our view, this approach could become more structured in the council were to enter into partnership arrangements whereby lettings agents source properties for council referrals of homeless people or those at risk of homelessness. NALS is currently working on a model whereby a “Social Lettings Agency” is created through links to one or more established local agents. This is an alternative to the traditional approach whereby entirely new voluntary sector entities need to be set up. We would be happy to discuss this model with the council at any time.

COMMENTS ON THE LICENCE CONDITIONS

Tenant Referencing

We are strongly supportive of any requirement to obtain references for prospective tenants, as NALS is actively involved in promoting good practice in tenant referencing.

Tenancy Management

NALS agents are expected provide and fill in a tenancy agreement on behalf of the landlord. They will always make sure the terms of the tenancy are fair and help the tenant to understand the agreement.

They will always provide clear information to the tenant about any pre-tenancy payments and what these cover. They will explain any requirement for a guarantor and what the guarantor role entails.

At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.

Under NALS’ service standards, agents are required to take a deposit to protect against possible damage. They are required to explain the basis on which the

deposit is being held and the purpose for which it is required, as well as to confirm the deposit protection arrangements. When joining NALS, agents are asked to provide details of the number and value of the deposits they have registered with the scheme.

Agents are asked to authorise NALS to contact the scheme to verify this information.

During the course of a tenancy, NALS agents will check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's deposit. They will return the deposit in line with timescales and processes required by the statutory tenancy deposit schemes.

NALS agents are also required to:

- Have a designated client account with the bank*
- Operate to strictly defined Accounting Standards*
- Be part of a Client Money Protection Scheme.*

These requirements provide additional security for client monies held, over and above the requirements of the Coventry City licensing scheme. Again, this is an area where increased NALS membership would be of benefit to the Council and local tenants.

Licence Conditions Relating to the Property

We welcome Coventry City Council's drive to improve property standards. We believe that NALS' standards go a long way to ensuring compliance with license conditions.

Under NALS' service standards, NALS agents are expected to visit any property to be let with the landlord and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can, therefore, be confident that NALS agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.

NALS agents are expected to explain both the landlord's and the tenant's the rights and responsibilities. To guard against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.

NALS agents are required to ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before they commit to the tenancy. They will provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.

Thereafter, NALS' standards require agents to carry out property inspections periodically, as agreed with the landlord, in line with normal good practice. NALS and our firms would anticipate inspections to be carried out every 6 months as a minimum, to identify any problems relating to the condition and management of the

property. In line with common practice, records of such inspections would contain a log of who carried out the inspection, the date and time of inspection and issues found and action(s) taken. Under a licensing scheme, this information could be shared with the council in an appropriate format.

Tenants will be fully aware of access arrangements. NALS agents are expected to arrange in advance a time for access, in order to inspect the condition of the property in accordance with the tenancy agreement. NALS agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.

Training

We welcome the scheme requirement that agents who are license holders should undergo training.

Membership of NALS means that agents already have access to an extensive training package, engagement with which should reduce the need for the local authority to intervene. Although not a condition of NALS membership, NALS offers accreditation through an online foundation course as well as qualifications such as BTEC Level 3 in Lettings and Management practice.

NALS offers training to those who have been involved in lettings and management for some time as well as those who are just starting out. Training is available for principals of firms as well as employees. Thus, NALS' Virtual Learning Environment (VLE) is designed to cater for a wide range of professional development needs. Training is easily accessible and can be undertaken when it suits the trainee. Any candidate completing the NALS Foundation Lettings Course successfully also has the opportunity to use the designation 'NALS Qualified'. NALS Foundation Lettings Course (Wales) is also approved training recognised by Rent Smart Wales, the Welsh Government's regulatory body as meeting the requirements for agents to have complying with their licensing requirement.

One advantage of this approach is that it makes it easy to ascertain (through on line monitoring) that participants have in fact undertaken the required training, prior to or immediately after accreditation.

Modules available cover:

- *Pre-tenancy issues*
- *Responsibilities and liabilities*
- *Setting up a tenancy*
- *During a tenancy*
- *Ending a tenancy*
- *General law concepts, statute vs contract*
- *Relationships*
- *Obligations*
- *Process*
- *Considerations for corporate tenants*
- *Continuing Professional Development (CPD)*

In addition, NALS provides mini online courses designed to cover a number of elements in more detail, as appropriate to the learner's role, include topics such as:

<i>Assured Shorthold Tenancies (ASTs)</i>
<i>Client Money</i>
<i>Consumer Protection Regulations (CPRs)</i>
<i>Deposits</i>
<i>Disrepair</i>
<i>Electrical Appliances & Safety</i>
<i>Gas Appliances & Safety</i>
<i>Houses in Multiple Occupation (HMOs)</i>
<i>Housing, Health & Safety Rating System (HHSRS)</i>
<i>Inventories and schedules of condition</i>
<i>Joint Tenancies</i>
<i>Notice Requiring Possession</i>

We would further suggest that discounted fees for NALS agents would provide an incentive to positive engagement with training that is fully compatible with the requirements of the licensing scheme.

Anti-Social Behaviour

We note that there are distinctive issues around crime and Anti-Social Behaviour (ASB) in the licensing area. However, we do have concerns about the assumed link between the amount of PRS accommodation in the neighbourhood and the incidence of ASB.

There may be some correlation between incidences of ASB and the prevalence of PRS accommodation on the area. However, correlation does not imply causation. The causes of ASB are many and varied. It is not, in our view, reasonable to expect agents and landlords to play a disproportionately large part in tackling them.

Furthermore, we would strongly advise against any proposals which imply a parity of approach between the PRS and the social rented sector. Social landlords are publicly funded (and regulated) to develop and manage housing on a large scale. Their social purpose brings with it wider responsibilities for the communities in which they work. As private businesses, PRS landlords and their agents, whilst having clear responsibilities to manage their properties professionally cannot reasonably be expected to tackle wider social problems.

Suitability of Licence Holder

We note the requirement that the council would only issue a licence if it is satisfied that the proposed licence holder is a 'fit and proper' person and that there are suitable management arrangements in place. We believe that this requirement highlights the importance of lettings and management agents belonging to recognised accrediting bodies like NALS, who themselves apply a fit and proper person test.

All principals, partners and directors of a NALS firm are asked to make the following declaration on application:

"I confirm that: for a period of 10 years prior to this application I have had no conviction for any criminal offence (excluding any motor offence not resulting in a custodial sentence) nor have I been guilty of conduct which would bring the Scheme or myself into disrepute; I am not an undischarged bankrupt nor is there any current arrangement or composition with my creditors; I am not nor have I been a director of a company which has within the period of 10 years prior to this application entered into liquidation whether compulsory or voluntary (save for the purpose of amalgamation or reconstruction of a solvent company) nor had a receiver appointed of its undertaking nor had an administration order made against it nor entered into an arrangement or composition with its creditors; nor have I at any time been disqualified from acting as a Director of a company nor subject to a warning or banning order from the Consumer Markets Authority or the Department for Business, Enterprise and Regulatory Reform.

If I am subject to any current claim or am aware of any impending claim for professional negligence or loss of money or if I have been the subject of any investigation by the Consumer Markets Authority and/or local Trading Standards Office, full details of the circumstances are set out in a report enclosed with the application; all information provided by me in connection with this application is, to the best of my knowledge, correct"

We believe this certification is broadly in line with Coventry City Council's licensing conditions and is another example of where promotion of NALS membership through discounts could help to ensure compliance.

Complaints

All NALS firms are required to have a written Customer Complaints Procedure, available on request. Our guidance sets out how the first step for complainants is to ask the firm they are dealing with for a copy, which will outline the method by which they can seek to resolve any issues.

In line with statutory requirements, all NALS members must also be members of a recognised redress scheme. Firms are required, at the request of the complainant, to refer the complaint to a redress scheme once their in-house procedure has been exhausted. They are also required to comply with any award determined by the redress scheme, within the timescale prescribed.

Under co-regulation schemes elsewhere in the UK, NALS has undertaken to review any complaints that have been adjudicated upon by any of the redress schemes. Under such an arrangement, NALS can report to the Council on the number of complaints reaching this stage and on the adjudications made. Non-compliance with a redress scheme's adjudication would eventually lead to disqualification of the agent from NALS. We would be happy to come to a similar arrangement with Coventry City.

CONCLUSION

It seems to us that many of the licencing requirements in the Coventry scheme highlight how important it is for landlords to work with reputable agents such as NALS members. Offering a discount to licence holders who work with a NALS accredited agent would help to promote this.

NALS would welcome a collaborative approach with Coventry City Council, based on shared objectives. We believe that agents who are members of a recognised body are more likely to embrace Selective Licensing and less likely to generate complaints or breaches of their licence. Discounted fees for NALS members would be a significant incentive to positive engagement by agents. In return, the Council would experience reduced administration and compliance costs.

APPENDIX 1 – COMPATIBILITY OF NALS SERVICE STANDARDS WITH TYPICAL SCHEME CONDITIONS

Example Scheme Conditions	NALS Service Standard Requirements
<i>Fees</i>	<i>NALS promotes complete transparency in agency fees. Members provide landlords with a statement of account as often as agreed.</i>
<i>Rent Liabilities and Payments</i>	<i>NALS agents collect the rent and pass it on every month or as otherwise agreed. The agent will keep a separate clients' account to hold all monies.</i>
<i>Contact Details</i>	<i>NALS agents are expected to respond to tenant and other legitimate enquiries in a timely manner. Up to date contact details will enable them to respond to tenants' requests for maintenance or repairs which might in some cases have to be referred to the landlord for approval.</i>
<i>State of Repair</i>	<i>NALS agents visit the property with landlords and advise on any action needed before letting the property. This includes any repairs and refurbishments needed to put it into a fit state for letting. They will also go with possible new tenants to view unoccupied property. Tenants can be</i>

Example Scheme Conditions	NALS Service Standard Requirements
	<i>confident that NALS agents have provided advice to the landlord concerning any repairs or refurbishments which are necessary.</i>
<i>Access and Possession arrangements</i>	<i>NALS agents will visit the property periodically during the course of the tenancy as often as agreed with the landlord. Tenants will be fully aware of access arrangements. At the end of a tenancy, they will always serve the tenant with the correct period of notice as set out in the tenancy agreement.</i>
<i>Repairs and Maintenance</i>	<i>NALS agents will arrange to have routine maintenance work carried out, up to a limit agreed with the landlord. The agent will refer expenditure above that limit to the landlord.</i>
<i>Access, Cleaning and Maintenance of Common Parts</i>	<i>NALS agents will arrange in advance a time for access to the property in order to inspect the condition of the property in accordance with the tenancy agreement.</i>
<i>Level of Facilities</i>	<i>NALS agents ensure that tenants are provided with copies of safety certificates on gas and electrical appliances before you commit to the tenancy. They provide details of the condition of the property, plus a list of its contents. The property will have undergone all required safety checks on furnishings, and gas and electrical services.</i>
<i>Deposits</i>	<i>NALS agents provide and fill in a tenancy agreement and take a deposit to protect against possible damage. They will explain the basis on which it is being held and the purpose for which it is required</i>
<i>References</i>	<i>NALS agents choose a tenant in a way agreed with the landlord, taking up references or checking the tenant's rent payment record.</i>
<i>Complaints & Dispute Handling</i>	<i>NALS agents explain both the landlord's and the tenant's the rights and responsibilities. To guard</i>

Example Scheme Conditions	NALS Service Standard Requirements
	<p><i>against misunderstandings, they will arrange for the preparation of a schedule of the condition of the property.</i></p> <p><i>During the tenancy, they will arrange to check the condition of the property and draw up a schedule to outline any deductions to be made from the tenant's initial deposit. They will return the deposit as soon as possible, less any appropriate deductions.</i></p>

(4) Residential Landlord Association (RLA)

Thank you for the opportunity to respond to the above consultation.

We have read through your consultation documents, and though we appreciate the issues that the Council have mentioned and the effect they can have on tenants, landlords and the housing market in areas proposed, the RLA is opposed to the scheme and has many general objections to Licensing overall.

The council has failed in its documents to prove sufficiently that private rented sector houses are the main perpetrators of anti-social behaviour and crime. The council has very similar issues in predominantly council/social housing estates with their highly regulated housing management and property standards. Clearly not solely a landlord issue. It is more about concentrated need. To identify a particular area for the introduction of licensing highlights a belief that the area has numerous issues, potentially blighting the reputation of the area. There is also a danger that the issues that the scheme seeks to address are simply moved elsewhere, as difficult or vulnerable tenants are moved on.

Raising Standards

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. Additionally, the decent homes standard is a measure of the standard of housing and has no legal applicability to PRS housing. The Housing Health and Safety Rating System (HHSRS) is the relevant standard for the PRS.

The Council already has the necessary tools to tackle poor housing management and conditions in the PRS. Rather than introduce a bureaucratic licensing scheme that will see scarce resources wasted processing applications, it should continue to direct these limited resources at identifying private rented properties and taking effective enforcement action, where necessary.

Fees

The worst landlords – the criminal operators – will simply ignore the scheme, as they do many other regulations. The high licence fees for both Selective & Additional licences will place a large financial burden on a lot of landlords, and as the council has already stated in the consultation documents that fees will not be able to be paid in instalments, this could

lead to landlords selling up and exiting the sector, thus depriving Coventry of much needed housing.

Fee Structure & Transparency

The council has proposed an unfeasibly complicated fee structure, with several tiers for one, two- & five-year licences for both Additional and Selective licences. Generally, property licences should be granted for the maximum period - five-years – unless there are grounds for not doing so. Local authorities must have a good reason to grant a shorter licence, for example: previous convictions, civil penalties or notices served. To issue a one-year licence for being unlicensed for 3 months could be seen as being heavy handed.

There is also the issue of the varying Stage one licence charges, as the processing fee varies from licence to licence. For example, for a one-year Additional Licence, the Stage one fee is £599.00, compared to £413.00 for a two-year Additional Licence for Stage one. It is difficult to see why it would cost the council £186.00 more to process a one-year licence for a landlord, as the licence application process itself will be the same for all the licences except renewal applications. The council should clarify why there are varying costs to process Stage one licence applications, in order to increase transparency.

Existing Enforcement Powers

There are over 150 Acts of Parliament and more than 400 regulations affecting landlords in the private rented sector.

Councils should use the enforcement powers already granted to them by the Housing and Planning Act 2016, ranging from civil penalties, rent repayment orders, banning orders and the introduction of a database for rogue landlords and letting agents, to their full extent, rather than rely on Licensing Schemes to regulate landlords in addition to these powers. The Council has also not taken into consideration the amount of informal enforcement activity undertaken between local authorities and private landlords.

Additionally, Coventry City Council has access to the Controlling Migration Fund, which allows local authorities to tackle local service pressures associated with any recently increased migration, which includes tackling rogue landlords and driving up standards.

The Tenant Fees Bill will also introduce a lead enforcement authority to provide guidance and support to local authorities regarding the enforcement of letting agent requirements, which comes into force later on this year.

PEARL Research on Local Authority Enforcement

Our Research Lab PEARL recently published a report on the level of enforcement at local authority level and analysis found that when it comes to complaints and enforcement, data shows that there was no significant difference in the before or after the introduction of the scheme. The criteria for Enforcement include: Improvement Notices served, prosecutions of private landlords commenced, HHSRS Inspections, complaints received, Hazard Awareness Notices served, and Emergency Remedial Action order served.

The findings indicate that Selective Licensing schemes do not support local authorities to improve standards or increase enforcement activities against criminal landlords. Rather, we argue that these schemes are to the detriment of good landlords and tenants, and local authorities need to engage in targeted enforcement against the criminals that provide unsafe housing. <https://research.rla.org.uk/wp-content/uploads/post-code-lottery-enforcement-prs.pdf>

Government review on Selective Licensing

On 20th June 2018, the government formally announced that they will be carrying out a review of Selective Licensing to assess its use and effectiveness by a independent commissioner to gather evidence on the effectiveness of the scheme. The results of this review will be published in the Spring. Taking this into consideration, the council should await the outcome of this review.

Conclusion

There are alternatives to licensing. The RLA supports a system of self-regulation for landlords whereby compliant landlords join a co-regulation scheme which deals with standards and complaints in the first instance, while those outside the scheme remain under the scope of local authority enforcement. More information can be supplied if required. We also support the use of the council tax registration process to identify private rented properties and landlords. Unlike licensing, this does not require self-identification by landlords, making it harder for criminals to operate under the radar.

Ti provides local authorities with a new tool to help differentiate between properties which are privately rented, HMO and those that are owner occupied or socially rented. Ti can also be used to pinpoint properties that are likely to have serious hazards. The technology can be used to assist with policy makers and managers to understand the 'make up' and changes in housing stock across a borough and how it relates to other policy areas, such as anti-social behaviour, and provides a vital insight into landlord behaviour and helps prevents crime and fraud, such as council tax evasion. It is developed in partnership with council teams to ensure the maximum benefits of Ti are delivered, and to ensure compliance with GDPR, no sensitive data is taken away and all analysis can be completed within the council's digital environment.

Such a scheme can be used as an alternative for Selective & Additional Licensing for Coventry City Council, as it could be used as more of an effective tool to identify and target properties in bad conditions and act against criminal landlords.

Further information can be found at this link: <https://metastreet.co.uk/blog/tenure-intelligence-to-predict-tenure-and-housing-issues.html>

Should licensing be approved by the council, the option of co-regulation with the RLA could be considered. Liverpool City Council introduced city wide licensing in 2015; as part of this the RLA were allowed to introduce a co-regulation scheme for landlords in the city. Co-regulation involves a full written code of conduct, which details the procedures and processes in place to deal with contractual and other matters as part of the overall scheme. The benefits of co-regulation for a local authority is targeted enforcement making the best use of more limited resources, reduced workload due to reduced number of complaints being managed by the authorities, easier identification of bad/criminal landlords, control over the scheme requirements to suit local needs and stronger links with the landlord community.

(5) Dear Adrian,

Happy New Year!

Firstly, can I say I appreciate what is done by the Council and its staff for the City, and as a former employee of a local authority I understand it is often a thankless task...and generally unappreciated by the general public.

Secondly,

Thank you for the information sent regarding the Forum and the proposals for licensing the rental properties within the areas indicated. I am sure there are many properties which ought to be of a far better standard, and there are landlords who ought to be far better in their responsibilities towards their tenants. It is the same across the nation.

Thirdly (and in no way a contradiction to my genuine thanks expressed above)

Having done a quick speed read...my conclusion is....what on earth is this about? I am not an ignorant person but I am having real difficulty reading and understanding over 130 pages of information. It is not the easiest of packages of information I have ever come across. I would wonder if the average landlord will pay the slightest attention to the mass of information here.

My own situation is that I am landlord of a student property with only 4 tenants on a single tenancy agreement. I have previously understood from contact with CCC that this scenario exempts me from any prospective licensing plan. All I need to know is...is this still the case? I am a landlord with an excellent reputation for care and due diligence for my tenants. My attention to their care is one of the USP's the letting agents give prospective student tenants, but I do know that this is not normal...sadly.

Could you simply confirm what I have been previously told, that is I am not part of the criteria this new proposal is intended for...or otherwise? It is not clear or easy to ascertain this from the documents I have downloaded.

(6) Dear Adrian,

Thank you for the clarification. What is the point of having a link in your recent letter to Landlords, which takes you to a map which is unreadable and then a Road checker which doesn't work!

I really do hope this consultation will not be a re-run of the consultation conducted over two years ago, where meetings were only attended by responsible landlords, who it became clear, already meet all the legal requirements and more.

It also became clear the scheme was a blatant money generating measure, designed to extract more money from good landlords, while failing to use the Council powers that do exist, to tackle poor and negligent landlords. What action are you taking to direct your current resources at effective enforcement activity?

What evidence do you have that Licensing Schemes improve Housing standards? How much of the income generated will be spent on creating a new, huge bureaucracy to administer the scheme, rather than spending money on the ground, flushing out criminal Landlords?

How many cases have you taken against criminal landlords over the last three years? How many cases were successful and what were the outcomes i.e. improvements made or fines obtained? How was income used?

Why is [REDACTED] included in this scheme? What criteria has been used?

What improvements do the Council plan to make to [REDACTED] if this Scheme is implemented? Resurfacing the road would be a good start, which is a disgrace, due to the neglect of the Council.

Your scheme has now blighted [REDACTED], while incredibly, nearby roads are outside the scheme! How do you justify these decisions?

I look forward to receiving answers to these questions and to hearing how the Council justifies introducing an outdated and ineffective Scheme.

(7) Dear Adrian,

I am somewhat alarmed that it is being proposed that we will now have two separate criteria running. One existing criteria at a national level, and one at a local level. How does the city plan to correctly attribute the different criteria? It will be a nightmare for Landlords (who, like me, don't fit one national criteria but apparently will now fit the localised criteria)...and a headache for the administration of both schemes. How are the City going to administer both sets simultaneously? It is a recipe for error. I would have thought that aiming the local to match the national (at least in the first instance) to catch those landlords who are having high numbers of tenants in totally unsuitable accommodations would be the priority. These are usually not managed by letting agents, who are legally required to make sure properties are up to standard before they let them. It is the very private (under the radar) landlords where the worse abuse is happening, then the illegal sub-letting which seems to be an increasing market – especially amongst vulnerable tenants (often migrant workers). Perhaps licensing the letting agents to do their job properly could be a place to start.

To have two simultaneous and, in parts, contradictory criteria operating makes no sense. I don't know how CCC are going to administer this without high levels (both time consuming and revenue costly) of appeal. I would have thought that fully and robustly implementing the national license in the first instance would be administratively higher performing. THEN (if it is found that there are still abuses) widen the catchment.

If CCC is like every other authority, then central revenues are falling heavily and there are increasing pressures on services and the need to “get creative” with revenue streams. I do hope this is not a stream in the making. I would have thought that CCC already have enough powers to deal with HMO under current licensing rules.

I shall read more intently the documents you suggest., and complete the questionnaire also. I will keep a keen eye on this proposal. As I live away from the area I would struggle to get to public meetings.

Thank you for the dialogue. It is helpful.

(8) Dear Adrian,

I will look at the information provided about this Scheme.

Please clarify one point. Is the Consultation to decide on introducing a Selective Licensing Scheme or not, or has the Council already decided to proceed and

therefore the Consultation is purely to fine tune some aspects of the proposals within the scheme?

(9) Dear Adrian,

I understand you are inviting comments on the property licensing proposal.

Scotland has a system for licensing properties and landlords and as far as I know this works well. This process together with other quality, health and safety requirements certainly makes landlords focus on ensuring that their property meets a high, regulated standard. However, although the licensing charges are modest, Scotland requires that the individual landlords are personally licensed as well as their properties. They also require that this licence is renewed every three years.

Although this is a good thing, it does penalise good landlords and factor in additional, increasing costs which inevitably pass down to tenants.

I believe that the process for improving substandard let properties could be more quickly attained, if the Council also considered licensing letting agencies.

If properties that were let through 'Licensed Agencies' were automatically approved and enrolled into the scheme, this would consolidate the responsibilities and liabilities Leasing Agents already have in this area. A Licensed Agency would be able to use their influence with landlords to speed up the implementation of any necessary property improvements. Letting Agencies usually undertake a 12-monthly inspection of properties, so they would be well placed to interact with the landlord In the event of any deterioration to a property over the previous 12 months and in the event of non cooperation from the Landlord organise any necessary repairs/improvements by withholding rental payments.

In this way Licensed Agencies would be able to take a great number of properties out of the equation and allow the Council to focus on the remaining properties and landlords.

It would also mean that responsible landlords who already employ a reputable agency to administer and monitor their property would not suffer further bureaucracy and costs.

(10) Dear Adrian,

My apologies for the delay in responding, but have been away.

Thank you for the update on the proposed licensing scheme and whilst I am strongly in favour of Council controls over all rental properties in Coventry, unfortunately I will be unable to attend this workshop.

I wish you every success in setting up the scheme and only hope that it results in the eradication of the many poorly run and maintained rental properties in Coventry.

Thank you for the prompt response.

(11) Dear Adrian,

I note your assurance, but it does seem at odds with the following paragraph on page 13 of the policy:

In cases where the licence is being issued to or on behalf of a new landlord who has never licensed a property before the first licence will run for one (1) year, and the licence must be renewed before it expires. After the first year, the opportunity will be provided to apply for a longer licence, provided all the relevant criteria is met.

By definition, none of us will have ever licenced a property in Coventry before. Because of the huge financial relevance of this point, I'd imagine it will be frequently raised at the consultations.

Can I also ask you, where does the data come from on percentages of rented properties, and how recent is it?

Also, how was the decision made on the perimeters of each proposed area? Including or excluding one or two streets could well completely change the statistical justifications.

I should declare my particular interest - we rent ten properties in Coventry, all relatively (20/30 years) recently built, all one or two bed purpose built flats/maisonettes. Five of these are outside the designated areas and five (not really of different quality of build decoration or surroundings) are on the [REDACTED]). That area is designated, although the % PRA at 19.6% is below the 20% cut-off.

(12) Dear Adrian

Thank you for taking the time to provide such a detailed reply. The map you gave me a link to is so much better, I suggest you provide this to all interested parties.

Regarding the licensing scheme, your clarifications make sense. I can see that tenants would be reluctant to complain for fear of eviction - although in my experience, eviction is a long drawn out process, even for non-payment of rent, costing the landlord even more money in court fees!

I hope the scheme is a success, and that it will achieve what it sets out to do. The material you sent out is complicated, and I would recommend that a simple summary of the scheme and its purposes and the different levels of fees would be a good idea, with the more comprehensive documentation available for those who want further information.

(13) Dear Adrian,

Thank you for the slides of yesterday's meeting by E mail.

We think we should thank you for organising and holding the meeting which was very informative under sometimes difficult circumstances.

We will continue to participate by filling in the questionnaire and in other further consultations and would like to suggest you consider further Landlords Forums in order to improve the Landlord capability in Coventry.

Best wishes

(14) Dear Adrian,

We will be away these dates.

but you need to know I am totally against this as you make it so difficult for us to evict bad tenants(anti-social) you advise them to stay put in there house until the landlord has paid thousands of pounds in the courts to get the bailiffs round and give them notice to vacate ..then they can move ????? .it cost me £5000

Then your housing dept sent me a letter saying I was over paid by something like £50 .when this Romanian gypsy who completely trashed my house costing me nearly £20000 to put right .and £5000 in court fees and rent arrears.

This fee you will be demanding will take a whole years profit from me so I am beginning to think being a landlord to help with my retirement is no longer an option .

(15) Dear Adrian,

Thank you for that. On the video whatever points I'm wrong about (other than my opinion) I'm happy to amend.

I actually agree with what you are doing 100 %

- We need to raise standards and this will do that*
- Rogue agents and landlords need addressing, this will do that*
- You need more staff, the current levels are ridiculous and your staff doing a glowing job with limited resources*

I appreciate now it's not an income for profit generator and the funds raised will go towards funding the department to make this happen.

I do strongly disagree with landlords having to fund it. We already pay tax for services to be provided.

(16) Dear Adrian,

Thanks for your reply

That may be so if we are allowed to pay it over 5 years otherwise it is very expensive especially when we will getting nothing and no help..

(17) Dear Adrian,

I have two questions which I wish to ask you.

Firstly, it is not clear to me on the documentation I've seen, if a landlord has a HMO license, will they need another license on top of this or is it a case, of as long as you have a form of applicable licensing this is suffice.

In addition, a number of my landlords wish to give their opinion on your proposals, how can they do this ensuring their opinion is taken note of and considered in your decision of whether to introduce the new licensing.

Thank you for your time in this matter.

(18) Dear Adrian,

Thank you for your presentation, of February 4th, on the proposals being put forward by the city council for the selective licensing of private rented accommodation, and HMOs not covered under existing regulation.

I have briefed senior management within [REDACTED] as to the strengths and weaknesses of these proposals from our perspective; as an independent advice agency dealing daily with the issues to which these proposals are addressed.

I am happy to say that, speaking on behalf of [REDACTED], we endorse the proposals put forward for both schemes as a positive and timely step in raising standards in both landlord behaviour and the private rented properties they rent.

This endorsement, though, comes with three qualifications. However well-intentioned these schemes are, we believe they cannot succeed unless:

Housing Enforcement can effectively meet the challenge set it,

Areas chosen for the selective schemes are subject to review once more up-to-date data becomes available, and

The council has a contingency plan ready to assess the short term impact of either proposal and respond effectively should that impact (on the availability of affordable rented properties for the homeless) be negative.

Selective licensing of non-HMO private rented accommodation and additional licensing of HMO properties is not a panacea. However, together with a strong commitment to housing enforcement, we believe it can make a real difference to the affordable housing market in Coventry; moving the city closer to a time when struggling tenants don't have to live in fear of losing the roof over their (and their children's) heads due to an arbitrary decision made by an unscrupulous landlord, or being forced to live in desperate housing conditions which generate or exacerbate health problems with all the consequences for work, school and quality of life.

(19) Dear Adrian,

Thank you for your e-mail - I have decided not to attend the meeting as to be honest i see it as a pointless exercise but i understand that as part of the criteria that it has to be carried out. i do however realise that this scheme will be implemented no matter what will be said at the meeting by the landlords - with the council having to self fund and with the scheme given the go ahead - i myself a landlord very much see the importance of all tenants having a high standard and well maintained property to live in - for them tenants to also feel part of the wider community and for

them tenants to also live within that property correctly keeping the outside area clean and tidy with no anti social behaviour for the community. i myself only deal with tenants who are of this standard and correct any issues with tenants if and when they arise - hope that the same can be said for social housing sector and we are not bearing the costs of them not dealing with issues - i am sure that you are fully aware over the last few years of how hard it has become being a landlord with the consent changes and on going implementation of costs through tax, licensing etc - within some cases the landlords having to now sell the properties and sadly having to make tenants homeless who you the council have to try and house with no houses for them - i understand the government is trying to bring houses back to the market maybe one day they will understand that not everyone wants or feels the need to be a home owner and now with the council having little or no properties sadly the matter is only to get worse with regards to homelessness - your reasons for having the scheme are correct by sadly being done in the wrong manner - the landlords and tenants that are causing the issues should be the ones only being penalized - when other landlord and tenants are working hard to make sure that everything is done in the right way - i also understand and have calculated the amount of money that the council could be making on this scheme which i believe far out ways the money that will go back into that scheme and once this goes ahead i will be taking a great interest in how the scheme is running and on how the funding of the money of the scheme has been spent - unfortunately most landlords now have taken the stand that any extra cost put on them by councils/ government/tax etc this will now be forwarded on to the tenant with the rent being put up - sadly yet again in most cases it will be the tenant that loses out and if they do have a dream of owning their own home this is moving further away from them - not all landlords want to make a lot of money some landlords just want to provide people with good homes

I apologise for the quick writing of this e-mail and for any missing spelling or grammar - but i just felt i had to put my point across

(20) Dear Adrian,

With reference to the licencing consultation

I fear what the council are not taking into consideration certain points.

By the end of 2019 the following will be in place by UK Law :

- All Landlords must join a redress scheme. 2019*
- 5 year electrical testing will be mandatory 2019*
- Client money protection for all estate agents to be in place 2019*
- Human Habitation act setting clear standards for housing March 2019*

We already have:

- Gas safe certification*
- UK immigration Right to Rent checks*
- EPC standards*

All of the above I feel is essential for a robust PRS

So what extra value will licencing bring when in reality the above points will already be UK legislation and will be followed by the majority of law abiding TAX paying landlords. Also if they utilise a regulated agency they will be covered by regulation.

Also landlords general costs are escalating with :

- Section 24 tax changes meaning increased tax bills On going*
- Tenant fee ban resulting in increased agency fees June 2019*

So rents will escalate with the above, add to this mandatory licensing and its simple to see where rents are heading. At a recent meeting with Mr Chowns some TEN landlords who represent over 1500 let properties all agreed they would be increasing rents

On the point of anti-social behaviour where the council feels this is directly linked to the private rental sector. If the police can't resolve it how do the council think Landlords will ?

Anti-social behaviour when linked to PRS often also equates to rent arrears. Consequently the council will then have to house tenants who have been evicted a cost they can not afford. The insulting point of this is the clear direction by Coventry Benefits team that ALL tenants will be deemed INTENTIONALLY HOMELESS if they move out on a court order, they are made to stay in situ until a bailiff is instructed.

All the Landlords agreed that the council need to be enforcing the law and tenants' rights. What we don't agree with is good landlords funding a department to do so.

(21) Dear Adrian,

Could you please explain how Landlords in [REDACTED] have 'failed to take steps to control anti-social behaviour by their tenants?' What evidence do you have to support this assertion, which has resulted in St. Margaret Road being included in the proposed SLS?

St. Michael's Ward includes Coventry City Centre. What are the respective crime figures for [REDACTED] compared to Coventry City Centre for the years 2016-2018? How do these figures support the Council's decision to include [REDACTED] PRS properties (and other nearby streets) in the SLS?

How many prosecutions have the Police brought for crimes recorded in [REDACTED], (or nearby) between 2016-18? Which of the following crimes listed below do you see as a) the responsibility of Private Sector Landlords to address personally, b) the responsibility of the Police and c) crimes which will be reduced by landlords forced to take part in the SLS? How will the Council monitor success in crime reduction? Which figures will you use as your Base Line?

Types of Crime: ASB/Bicycle theft/Burglary/Criminal damage and arson/Drugs/other crime/other theft/Possession of weapons/Public order/Robbery/Shoplifting/Theft from the person/Vehicle crime/Violence and sexual offences.

At the meeting we attended you mentioned properties built by Coventry City Council. How many properties have been built by the Council and where? Have these properties been built to rent and aimed at the starter/affordable housing sector? Does the Council have any plans to refurbish empty properties within the City and make them available to rent? If so, when and where? How many empty properties are there in Coventry as of February 2019?

Low Housing demand Points 3.7/3.8. The Council's case is that Low Housing Demand/price falls = poor Landlords = anti-social tenants = ASB, is not proven. All but 2 areas listed in Table 2 on p.20 experienced a decline in house prices! Council information states 2015-18 average house prices in Coventry were £171,274 compared to £150,000 in CV1 and £159,000 on [REDACTED]. This proves little other than confirming house prices are different across the City due to local and National events e.g. since 28.1.19 houses prices fell at the fastest rate in 6 years and unsurprisingly Brexit is causing unprecedented turmoil and uncertainty in all sectors, particularly housing. Hardly a good time to introduce SL & AL Schemes based on such dubious data sources. Also, to include roads like St Margaret in a Ward as big as St. Michael's (using the 'mainly in ward' catch all heading) to reinforce the outcome wanted by the Council i.e. that all figures point to an 'influx of unprofessional Landlords' in these wards, is a nonsense.

Please explain what a 'Mixed Community' is and demonstrate how such Communities lead to low or high demand? Please give an example of a perfect 'mixed community' in Coventry. Would a student population in e.g. CV1 lead to figures showing a 'high turnover'? Is this deemed bad? What action have you taken to ensure such 'raw' figures do not distort the CV1 Ward data? St Michael's Ward has both EU/Non-EU Migrants and students due to the University. Isn't this a strength?

We look forward to receiving answers to the questions raised, as all the evidence we have seen points to a flawed Scheme, designed simply to raise money to employ more staff (40!) engaged in administering a Licence Scheme, leaving PRS Landlords, if what was said at the meeting is correct, to be responsible for enforcement!

Just in case the points we made at the meeting were not recorded:

1. The Scheme should be scrapped because it targets all PRS Landlords, regardless of whether they already comply with current laws/legislation, or not. Why should good landlords pay for a scheme to manage bad landlords?
2. The Scheme is simply about raising money to fund administration of a new scheme, rather than enforcing existing laws.
3. The scheme charging structure is ridiculous. Comply and you will still be charged £380 for something you do not need! Other Authorities are sensible e.g.

Peterborough - £50 (instead of £550) is charged for Landlords who are already members of either NLA or RLA.

4. Figures from large wards e.g. St Michael's Ward are deliberately used to draw in as many properties as possible e.g. no attempt to separate out City Centre figures from streets with very low crime figures, within the same ward. All have to be in the SLS. Why?

5. Why is the Council now making Private sector Landlords responsible for ASB? Dealing with ASB must ultimately be the role of the Police. You appeared to be the only person present who didn't appreciate this point.

6. How will you administer Licences for 8,752 properties, visit each property and complete each licence application within 12 weeks?

7. In Year 1, how much income will be generated from 1) SL and 2) AL Scheme Fees? How will this income be allocated?

8. What qualifications, training etc. will new staff have? What do they have to do to make sure we are 'fit and proper persons'?

9. It is not acceptable for Council staff to make unannounced visits to my property. We would not do this to our tenants. Why should you?

10. Why if the SLS & ALS are so good, are the NLA & RLA against these schemes?

11. Why in the space of just over 2 years have Coventry City Council discovered the SLS needs to be introduced in to 13 wards, rather than 1 in 2016?

12. Why is more of the 5 year Licence fee spent on Administration than enforcement? This illustrates perfectly the distorted priorities of these Schemes.

13. How many 'rogue' landlords have the Council fined in the last 3 years?

14. What Laws or Regulations have Coventry City Council used to make sure Landlords comply with Housing Laws, regulations etc?

15. Many of the statistics quoted are from the 2011 Census. How can these figures be relevant in 2019?

16. What has Coventry City Council (CCC) done to reduce the 14,000 housing waiting list?

17. Why is CCC alienating Private sector Landlords when they are the only sector providing substantial numbers of properties, by investing their own money to make properties habitable, increasing the Housing stock?

18. How will the SLS lead to regeneration of for example [REDACTED]?

19. Housing is a whole City issue. Why not create funds raised through Council Tax income, to both pay to refurbish empty/repossessed properties to tackle the housing shortage (money paid back over several years through rents) and fund enforcement, which through the council Tax registration process will identify private rented

properties and Landlords, making it harder for 'rogue' landlords to continue to operate undetected.

*20. Use existing Laws to target and send a message to criminal Landlords. Table 17 is presented as reason **not** to use existing Laws! CCC need to Fund enforcement not more administration.*

21. The First Tier Tribunal process quoted under Housing and Planning Act Enforcement as a reason not to use this approach, as the Tribunal process is "time consuming and resource intensive," is the very process to be used to resolve SLS Appeals! How do you justify this contradiction?

22. "Criteria can be set to reward good and punish bad Landlords." Criteria appears to be given more importance than using the Law. As Landlords how will 'criteria' be used to rewarded or punish us under the proposed SLS?

23. Point 3.8 reveals the Council does know when criminal Landlords move in to an area, but appear to do nothing about it. Why?

24. £6/mth x 5yrs = £360, so why is £380 quoted? There is no cap on the fee charged. CCC can charge what they want from year to year. Want more administrators - fee increased. Not acceptable.

25. Figure 14 - admits CCC does not have LSOA data on PRS by Ward. It is assumed the PRS Housing sector stock is worse due to age. We have replaced, roof, windows, heating, insulation etc, therefore this sweeping assumption cannot be correct.

26. Bureaucracy gone mad. As well as having to join the SLS (on top of our existing RLA membership) we will have to join the CCC Landlord Accreditation Scheme (cost?) and follow the principles of the Private Rented sector Code (if have an Agent) and join the Government Redress Scheme! Also read 148 pages plus of information associated with these schemes, so we know what the Council want to do! How many people will have the time to do this?

*27. Selective Licensing Questionnaire - Questions asked apply to owners of **all** types of properties. whether they have a connection with Coventry or not and does not seek to establish the views of Landlords or tenants about e.g. alternatives to a SL Scheme, process, value for money, efficiency, use of existing Housing Laws, enforcement etc. Where is the question, should compliant Landlords have to pay anything or be responsible for ASB? The Licence holder questions apply to **all** property owners! Re: Management of a property, again some of these points apply to all owners. Kitchen facilities - refers to H & S issues, common to all property owners. Of course these are all 'reasonable' expectations, so all returns will be positive, producing the desired outcome for CCC! Information Pack - the replies are irrelevant, as tenants should receive this information now!*

28. CCC asked to check all gender designations listed are appropriate.

In what tangible way will anything said by ourselves and everyone else who attends the consultation meetings, have on influencing the proposed Licensing Schemes? All

the CCC text is written in terms of, the schemes are going ahead regardless of what you think. We just want to have your 'input on the way the schemes could operate', but then take exception or appear to ignore points made, when we do not agree with what is proposed!

Yours sincerely

(22) Dear Adrian,

I think the Coventry area has needed this for a while, with properties in poor condition, and landlords wanting premium rents without the premium properties. You are more than welcome to use any comment you feel necessary. I went through a similar process some years back with the implementation of the decent homes standard for Social Housing tenants, and the private sector has needed to play catch up for a long time.

Looking forward to working with you in the future – exciting times ahead.

(23) Dear Adrian,

I have read, albeit quickly, the information regarding proposed property licensing for private landlords in Coventry. I live in [REDACTED]. I have completed the questionnaire but would like some further points to be taken into account.

I am amazed that only part of [REDACTED] is to be included in the designated area for licensing. I live in the part of the estate that is not covered and clearly we do have problems too. Why do you consider that a portion of the estate should be licence free? We are one area surrounded by [REDACTED] and as such should be treated as one estate. As soon as owner occupiers move or die the landlords swoop into our street to purchase these homes because they are mainly smaller properties which landlords can rent out cheaply so these properties attract those on lower incomes. I moved to this property after a divorce in 1993 and decided I would need to live in a smaller property which I could afford to run in my retirement. Now half of this street is tenant occupied. Households used to be single occupiers or elderly or childless older couples. Now we have younger community and some families of 4-7 people trying to live in a tiny two bedroom houses because that is all they can afford at the extortionate rents being charged. I strongly object to our small area not being included in the whole designated area of Clifford Park Estate.

Sadly to say in most cities often the tenant doesn't report things to landlord because he's not bothered because it's not his property. When things are reported the Estate Agent doesn't address the situation and certainly not quickly and very often the landlord doesn't want to address the problem as it may require money to fix and that would eat into his monthly profit. So tenant, agent and landlord don't care, as long as the rent is being paid, which leaves the householders on either side of tenanted property to suffer the consequences.

The property licence fee should not just be to protect tenants it should work to protect neighbours of those properties too so that everyone on the estate can live in harmony and enjoy a good and equal quality of life.

If the licence fee was to be afforded by the Coventry Council Tax payer then I would expect all areas of Coventry to be included in this programme; after all all taxpayers would be contributing. There is no point having a licence fee if you cannot compel the landlord to address the tenant's behaviour. This would ensure that the City as a whole had improved standards and conditions.

It may be tenant agreements differ but I think most contracts require the tenants to cut lawns, weed gardens, clear rubbish, put out their bins regularly and trim bushes and keep area free of rubbish. However these people don't always seek to live such a tidy life. With many of the tenants that have lived next door to me they only cut the grass once during the season and that is before they leave the property so they can get their deposits back. Weeding is a definite no-no so grass grows into the flowerbeds and even the weeds grow over the footpaths on some properties in this street. Rubbish is left at the property when tenants leave; they usually fill the recycling bin with none recyclable stuff just to get rid of it which is left in the street or in the back garden. I know one new tenant asked the landlord to get the bins emptied so he could use them and the landlord refused and said it wan't his rubbish and the new tenant was left to sort the bins and dispose of the rubbish at the tip. (The landlord could have driven once to the tip - problem solved and respect between landlord and tenant would have prevailed).

As we have said many tenants are on low incomes so if the landlord wishes the grass to be cut then surely he has to provide a lawnmower? If the tenant took the lawnmower with him when he vacated the property then the landlord would have every right to delete the cost of that item from the return deposit. Why do tenants have such low I.Q. that they think it is acceptable to leave bottles, cans and paper rubbish lying outside of the garden gate when a wheelie bin is provided, this is just laziness and a disregard for neighbours quality of life.

I have to say the standard of repairs when carried out leave a lot to be desired. These repairs are done at the cheapest cost by people clearly having no relevant experience and add to the downgrade of the property. WHY OR WHY do landlords think that tenants should live in properties where the paint is peeling off, the wood rotting and the plastic windows and doors are filthy? Surely the licence should stipulate that properties are to be painted every ten years at least!

*I do hope my points will be taken into consideration and hopefully addressed because it didn't take your report for us to know that our house prices are not keeping pace with inflation because the area is declining. **Again, it is the less well off in society that suffer the consequences of social change.***

(24) Dear Adrian,

The vast majority of people want to live in a safe, predictable world and will do right by others. There however always going to be some that wish to do harm to others, not live up to their social or legal obligations and flout the law. Fortunately over the

years the various departments that help organise and run the country have been given the powers to tackle these problems and, in reference to our particular discussion, prosecute rogue landlords.

I have a number of issues with your proposed licensing scheme:

- 1) The problems you are proposing it will tackle you already have the powers to tackle. What you don't have is the ability to identify the rogue landlords in the first place and tackle them head on. Even when you have a route to identifying them you do nothing. Earlier this year I read the following: "Exclusive figures were obtained by CoventryLive from Freedom of Information requests made by the Residential Landlords Association. Experts have warned that "landlords are breaking the law" and "getting away with murder" following the revelation that a total of 675 complaints were made to [Coventry City Council](#) against rogue landlords in 2017/1 but that there were no prosecutions".
- 2) You state it will be cost neutral. Your spreadsheet might well be structured in such a way to show that but clearly as you and your department already exist, and has existed for a long time, and you already have the powers to do the things stated under the heading of "benefits a licensing scheme" the budgeted allocated to run your team has clearly been identified as an area where a cut can be made but recouped elsewhere. Where do you recoup the cut from? You target the easy to identify, law abiding landlords to replace your shortfall and low and behold it is cost neutral.
- 3) You claim rents will not go up and that market forces will prevail. I think your timing on this is clever as I think in the short term rents will stagnate and may even drop slightly but it will be nothing to do with your licence. Rents will stagnate for the short term due to the influx of purpose built student accommodation blocks with approximately 10,000 new rooms are coming online over the next couple of years. However with the population of Coventry expanding and with both universities planning on growing by 13,000 students the demand for accommodation will once more outstrip supply and rents will rise. Why will they rise? Because all of these landlords, including the ones that have been purpose built, don't just have costs to meet but a margin that they need to make. When that margin is eaten away by higher costs then the market will respond, not as one and not as one lump sum directly mirroring your licence but make no mistake as costs go up rents will go up. Your licence is one of those costs and rents will rise as a direct result of the costs you are putting on accommodation in Coventry.
- 4) As I read it you are planning on charging two fees on some properties in certain areas if they are HMOs. How the in god's name is that fair? The majority of the points on both licences are identical so why are you charging some landlords twice? See point 2 for the answer.
- 5) Has this scheme worked elsewhere? No. I speak from personal experience as I have property in Newham as well as in Coventry and it has not changed anything about how I operate, what I do for my tenants or how they work with me. What has it done? The rent has gone up. Why does she stay when there are cheaper places in London without a licence? Because it's a good

property, well maintained, in a good area with landlord that cares and that she can communicate with. Has it made any difference to the tenants and the neighbours of rouge landlords in Newham? Not one bit because like you Newham already had the powers to tackle rogue landlords and what they lack is the ability to identify those rogue landlords and tackle them head on.

I would urge you to reconsider implementing these licences for the good off both landlords that obey the law and tenants that will end up paying higher rents. I would urge you to stop spending public money on a marketing campaign to justify what you are doing and focus the money on ways or targeting rogue landlords that will genuinely benefit tenants who are suffering in appalling conditions.

(25) Dear Adrian,

You guys are really taking advantage of landlords.

It's ridiculous what level the city council will go down too to make money from hard working people.

This is my pension !! I have great families and look after my homes, your a bunch or white tie theives !

(26) Dear Adrian,

Thank you for your reply. I did find the meeting useful and your e-mail has clarified things for me in relation to how it would impact [REDACTED].

Although I can understand landlords concerns regarding additional costs they will incur, I do think that any measure designed to raise the standard of rented accommodation in the City and address issues around ASB has to be a good thing.