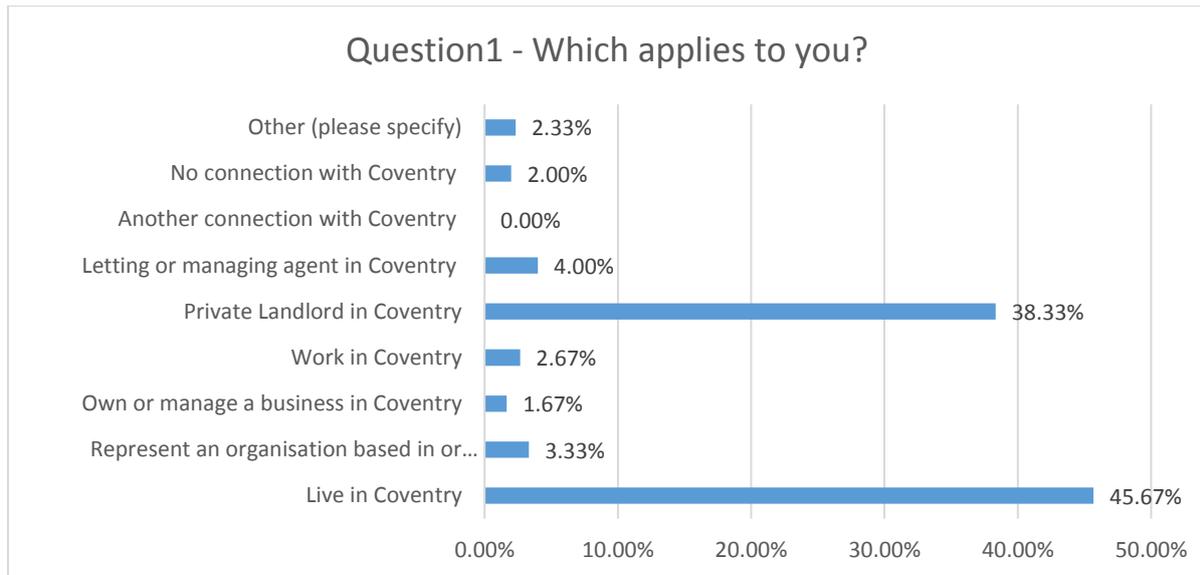


Appendix 2 - Selective Licensing Consultation Results

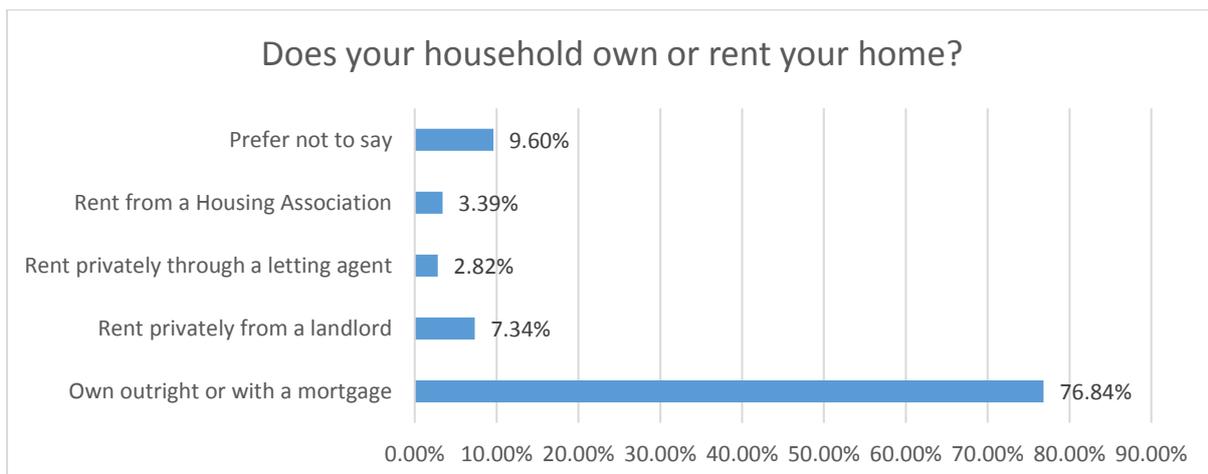
Online Questionnaires

The Council received a total of 301 responses to the Selective Licensing online questionnaire. The questionnaire consisted of 20 questions, 8 of which related to the specific proposals about Selective Licensing.

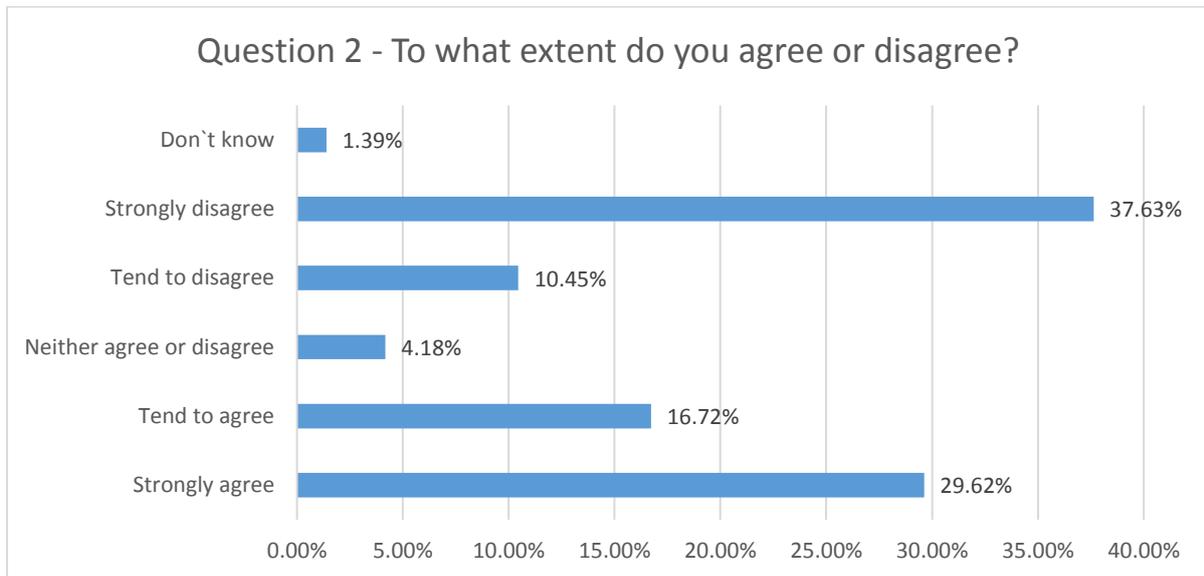
Question 1 – Which applies to you?



To understand further who responded to the consultation it is worth considering Question 20 at this point which asked, “**Does your household own or rent your home?**”.

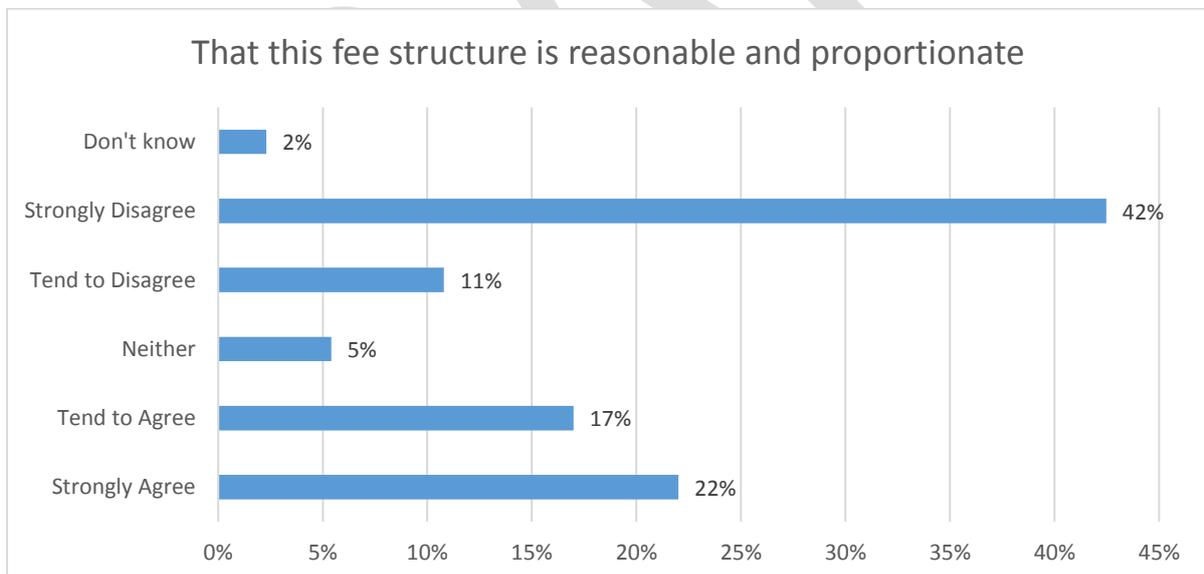


Question 2 – To what extent do you agree or disagree with the proposed Selective Licensing Scheme?

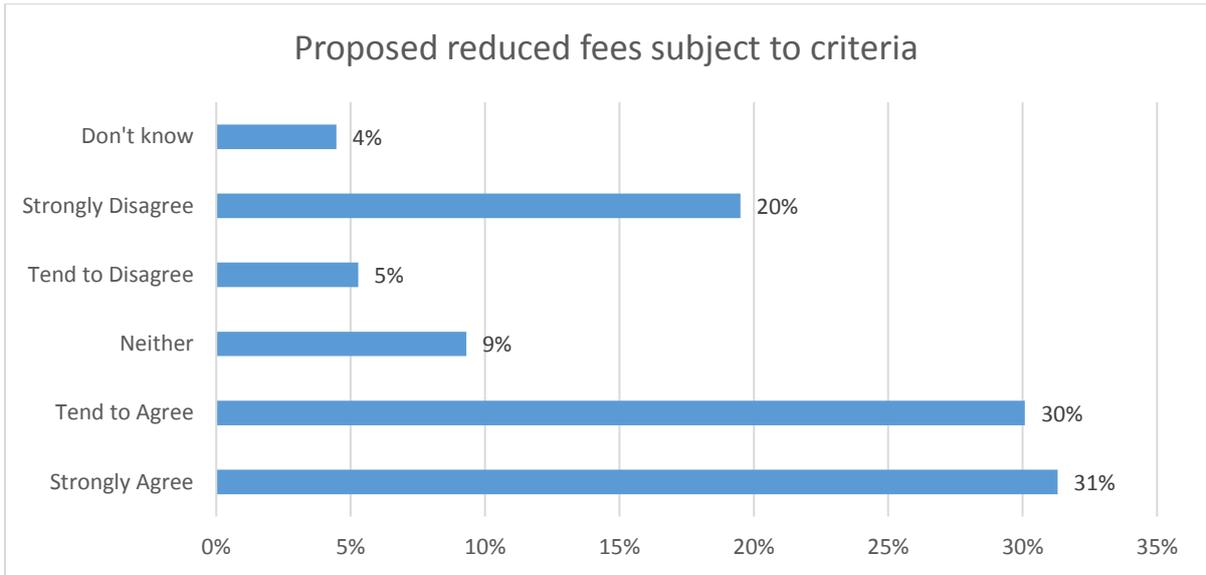


Question 3 – To what extent do you agree or disagree with the following?

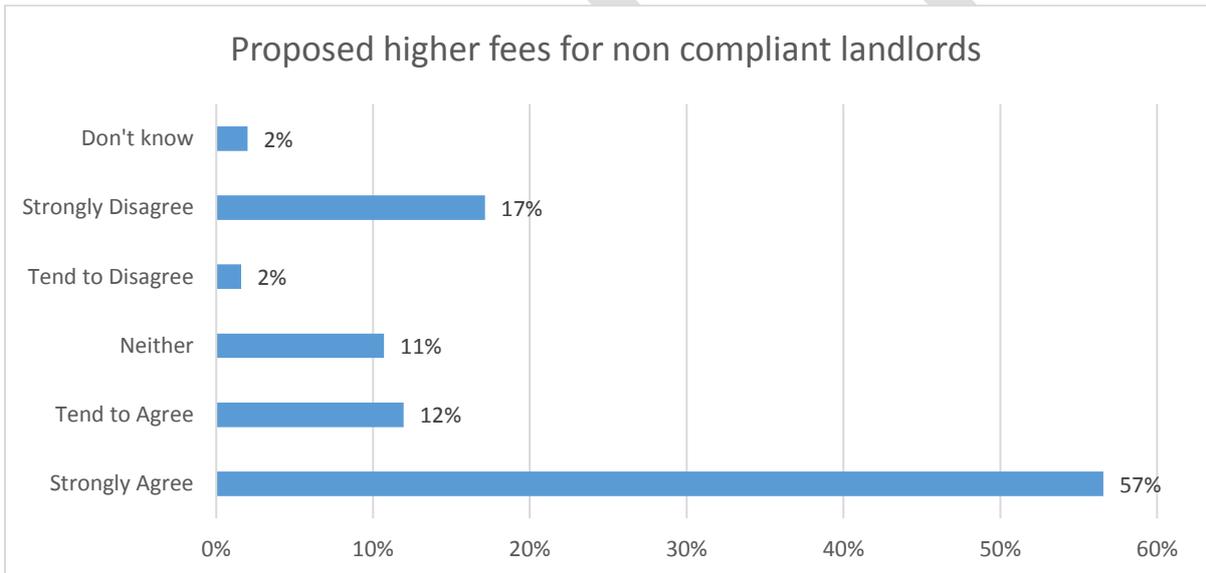
3a – That this fee structure is reasonable and proportionate.



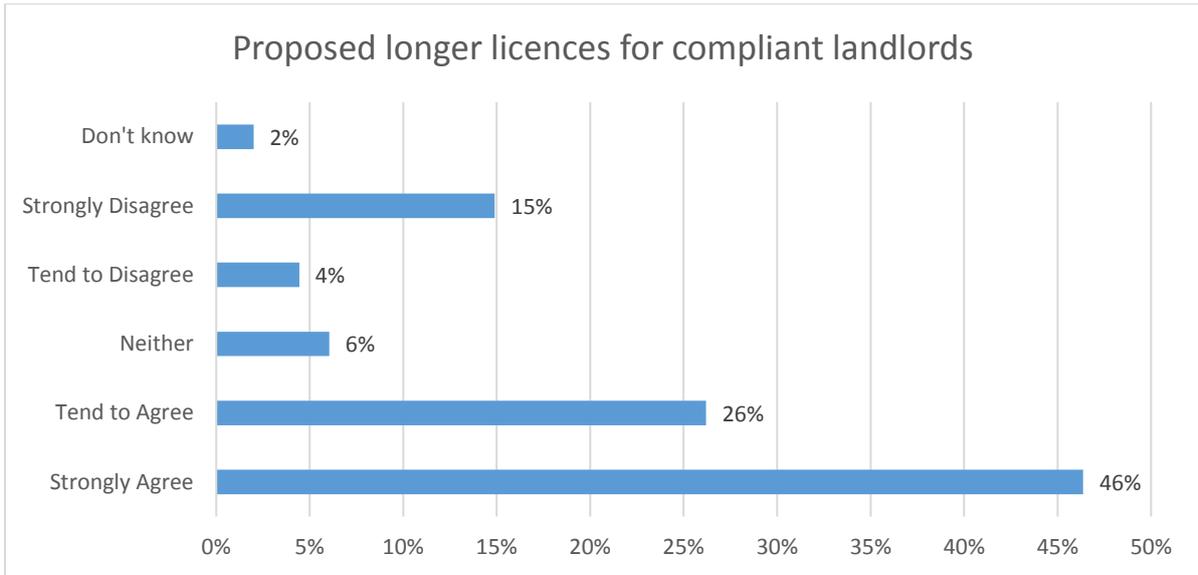
3b – Proposed reduced fees subject to criteria



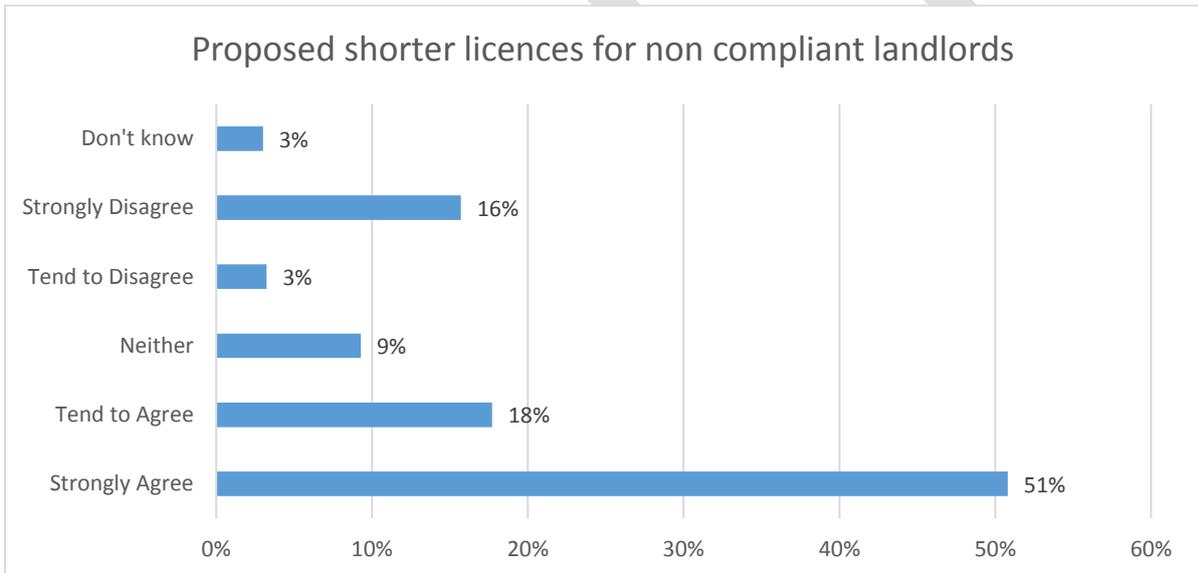
3c – Proposed higher fees for non-compliant landlords



3d – Proposed longer licences for compliant landlords

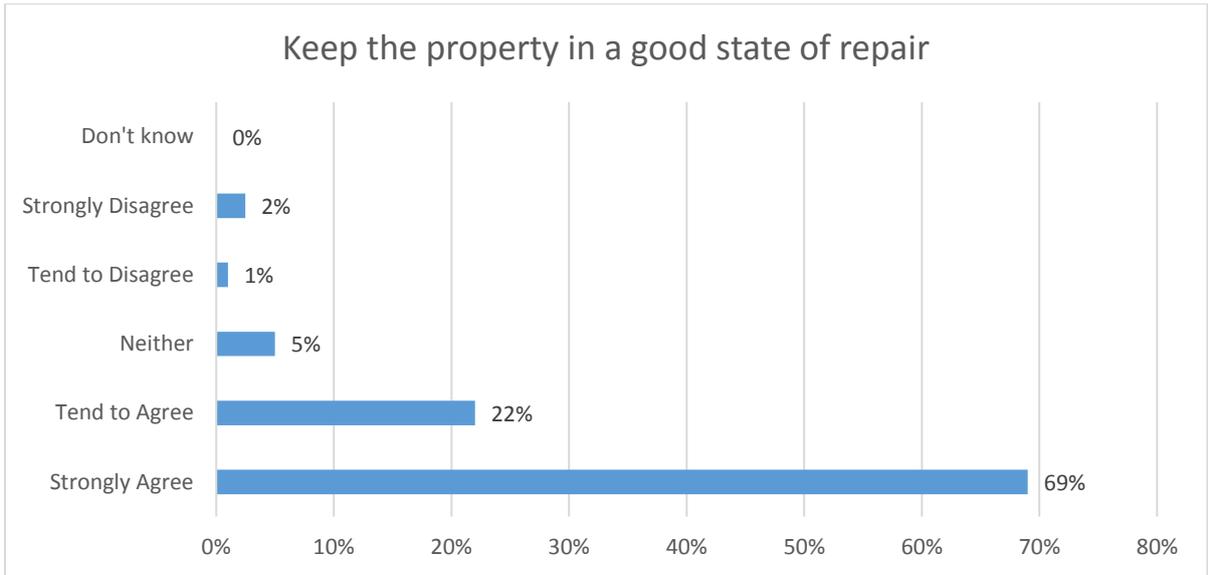


3e – Proposed shorter licence for non-compliant landlords

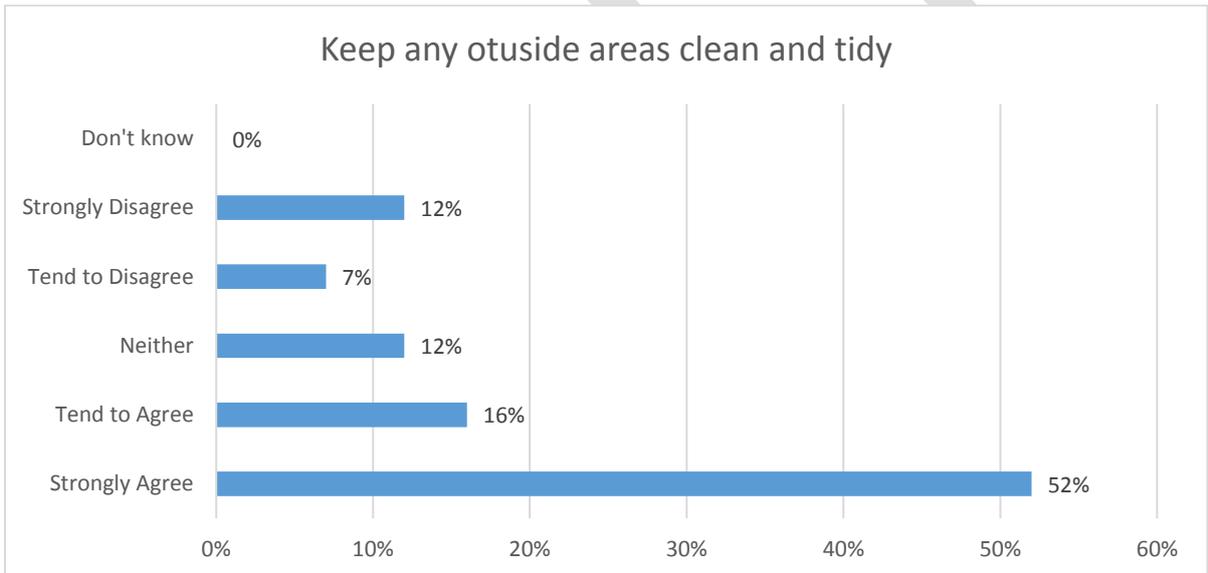


Question 4 – To what extent do you agree or disagree with conditions around the following issues and principles about the way in the property is managed; The Licence Holder MUST...

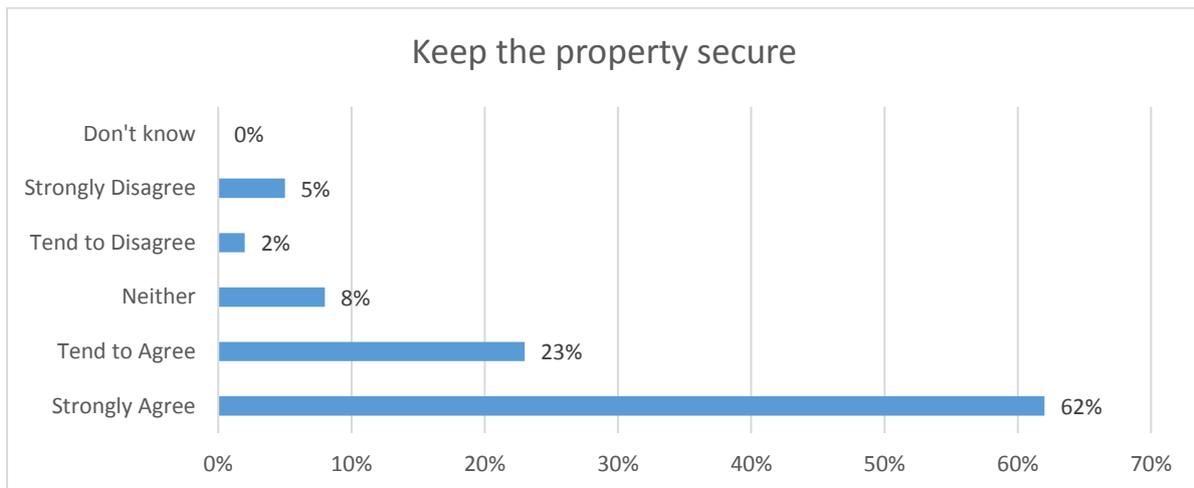
4a – Keep the property in a good state of repair



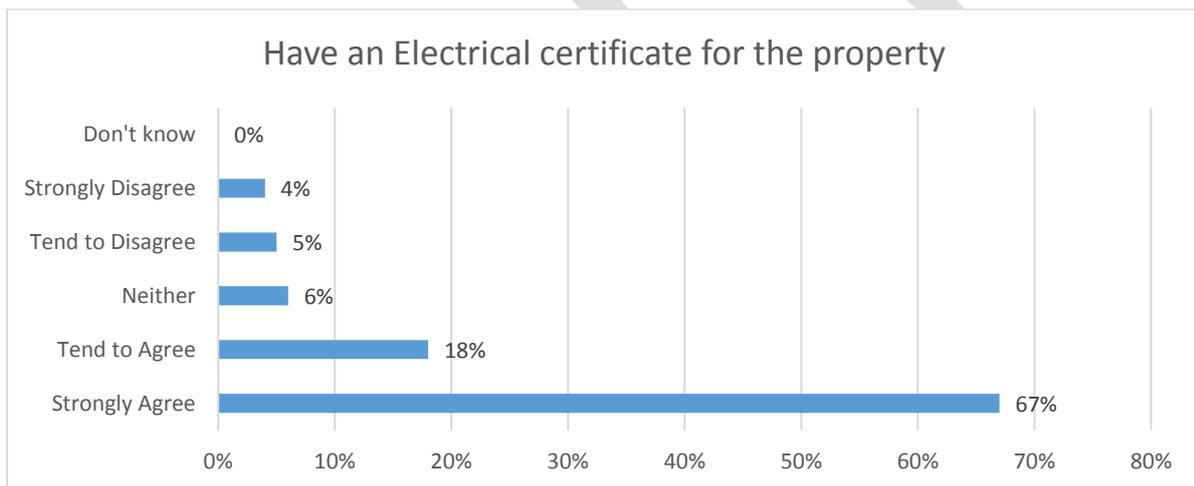
4b – Keep any outside areas clean and tidy



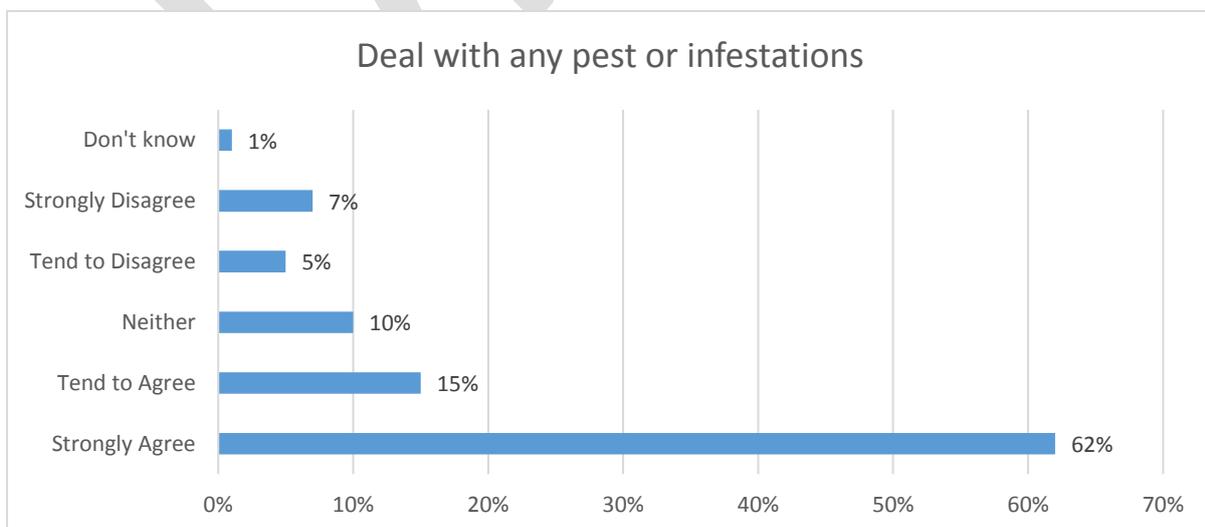
4c – Keep the property secure



4d – Have an Electrical certificate for the property

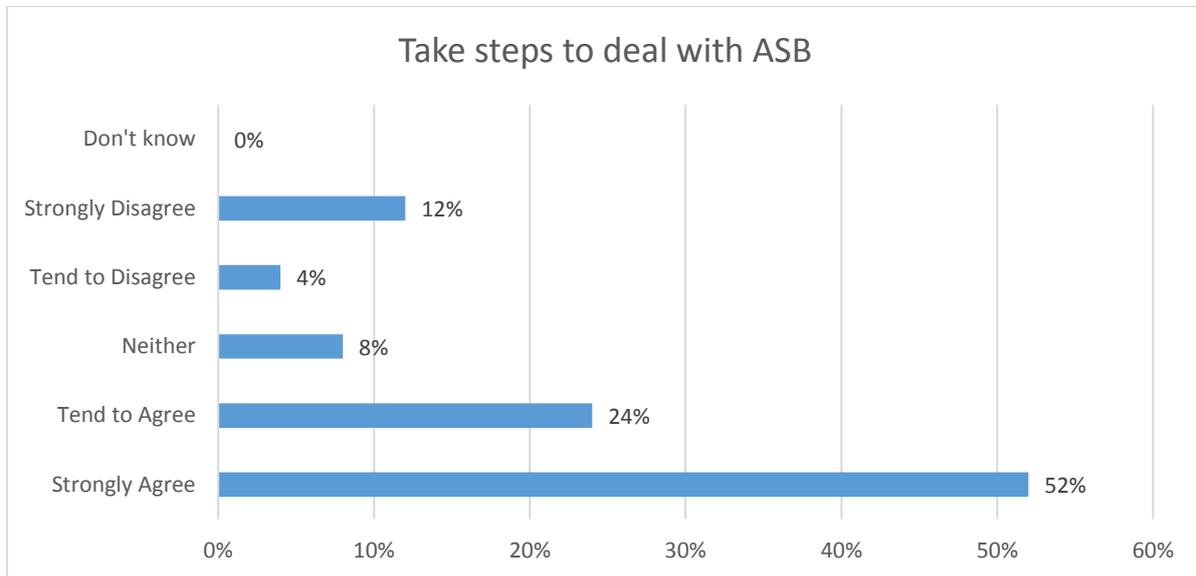


4e – Deal with any pests or infestations

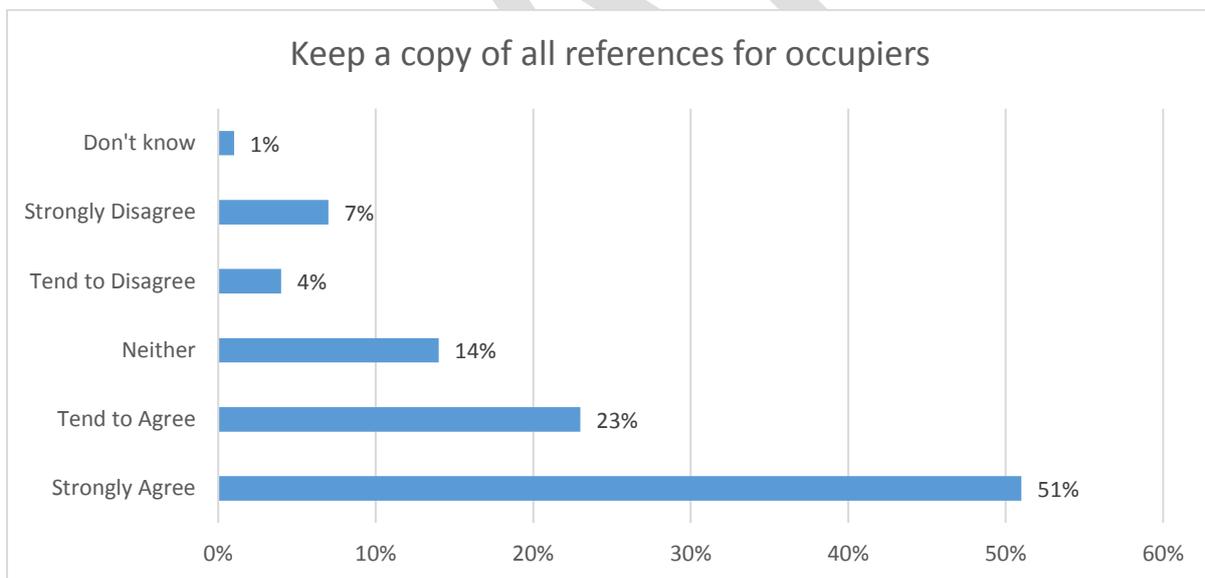


Question 5 – To what extent do you agree or disagree with the following conditions about the way in which the tenancy is managed?

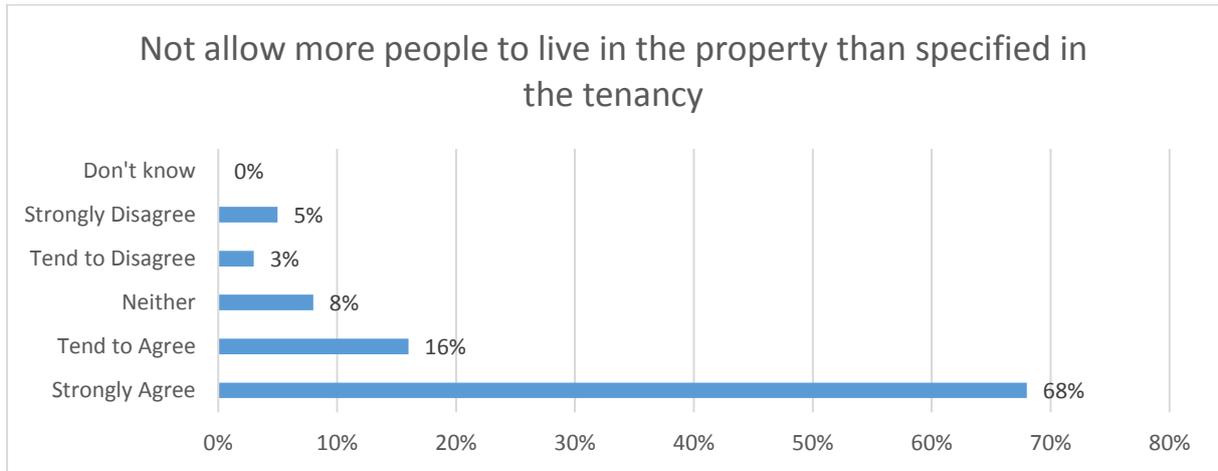
5a – Take steps to deal with anti-social behaviour (ASB)



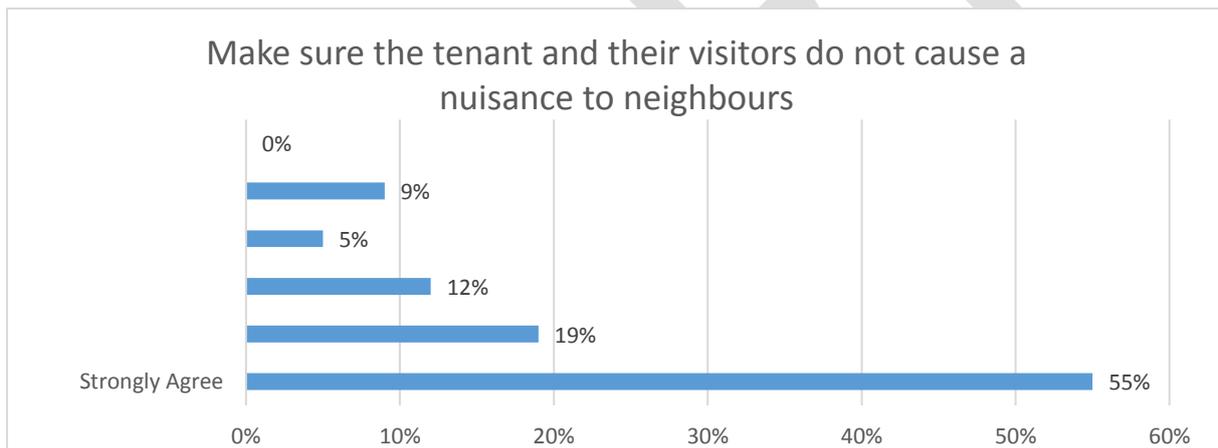
5b – Keep a copy of all references received for every occupier



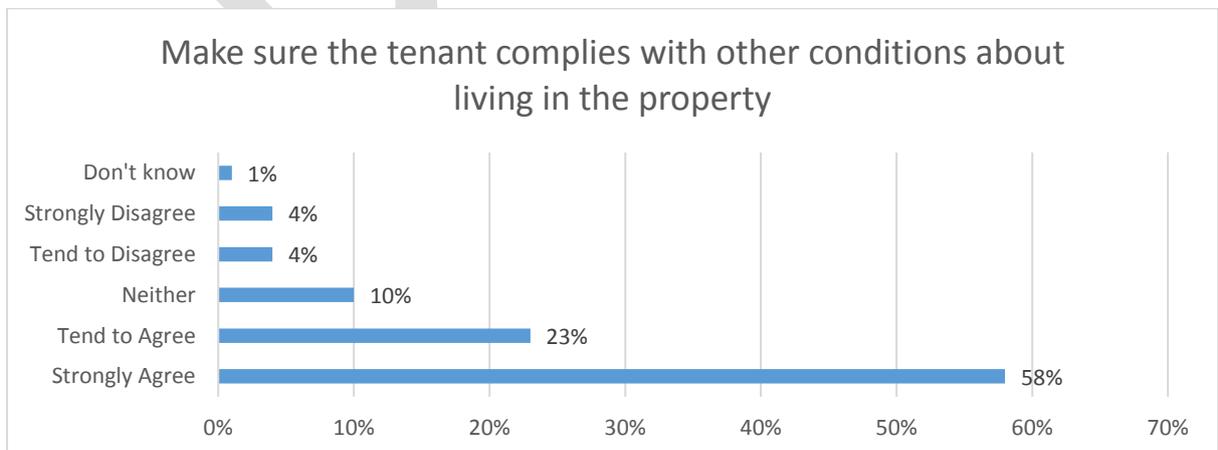
5c – Not allow more people to live in the property than specified in the tenancy agreement



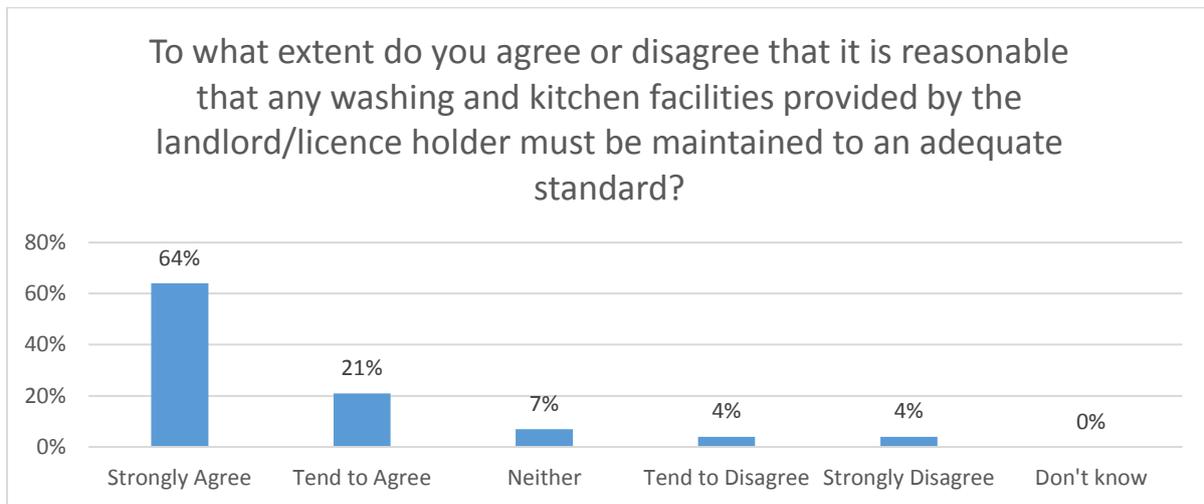
5d – Make sure the tenant and their visitors do not cause a nuisance to neighbours



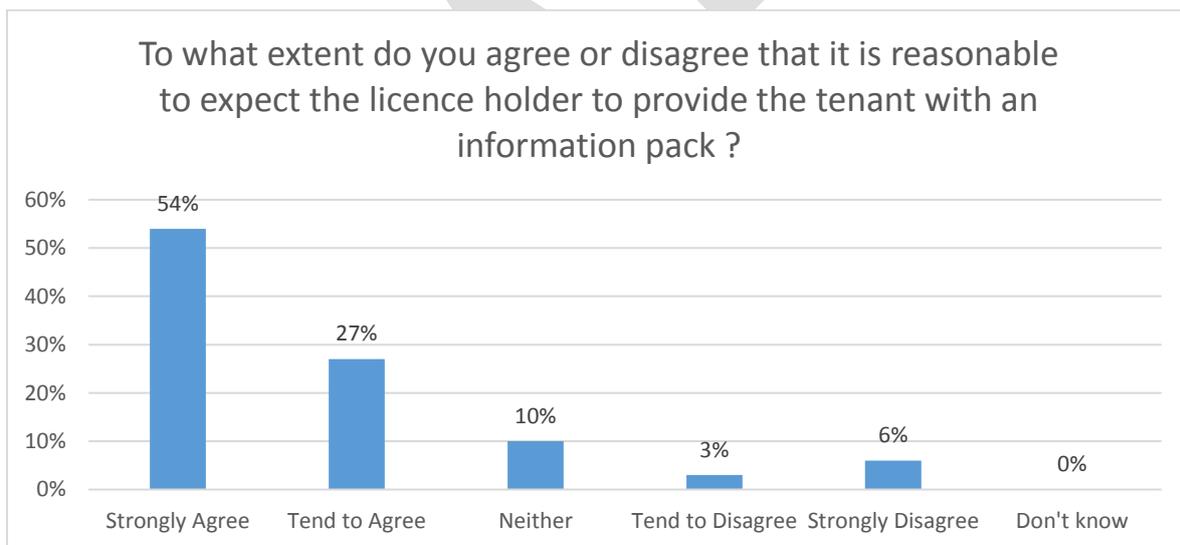
5e – Make sure the tenant complies with other conditions about living in the property



Question 6 - To what extent do you agree or disagree that it is reasonable that any washing and kitchen facilities provided by the landlord/licence holder must be maintained to an adequate standard?



Question 7 - To what extent do you agree or disagree that it is reasonable to expect the licence holder to provide the tenant with an information pack?



Comments From the Online Questionnaire

- 1) The council has failed to make any of the arguments that are claimed in the report published for the purposes of the consultation. The data do not support the conclusions drawn and have been misrepresented in some cases in order to obscure the facts. To proceed with this scheme therefore would constitute an act of fraud and of malfeasance. The council has: 1. Failed to make the case that there are specific problems with private rented properties or HMO's. 2. Failed to make the case that a licensing scheme would result in any improvement either for tenants, businesses or the wider population of the city. 3 failed to consult with relevant parties in any meaningful way 4. Failed to consider any alternatives to licensing 5. Made no attempt to collect any actual data which might help to

analyse the market and support any conclusions 6. Failed to meet their own stated aim of 'working in partnership' with stakeholders And in so doing has failed to meet the requirements of the legislation (housing act (2004)). 3/21/2019 9:22 PM

- 2) I do not believe in making any more charges where the landlord is concerned. This will only increase the rate landlords will charge. Although i appreciate what you are trying to do, charging landlords who already ensure their properties are good, should not be penalised. I think it would be an idea to charge a landlord who is in breach of making sure their properties are fit for habitation. 3/21/2019 8:06 PM
- 3) Should be countrywide 3/21/2019 4:03 AM
- 4) Mind your own business! 3/20/2019 11:14 PM
- 5) I fundamentally disagree that such a scheme WILL "lead to a reduction/elimination of significant and persistent ASB" - or improvement of the areas (as proven in other SL regions!) A Voluntary Landlord's Forum - and/OR the proposed free CLAS is a better means of improving standards, where they may fall short. The proposed 22 F/T additional staff could be vastly decreased if Intelligence was targeted purely at rogue landlords! The majority of those proposed resources would be WASTED purely on administration of responsible landlords only, for the sake of it! Rogue landlords won't register! You already have the legal powers to prosecute them, without doing so on grounds of a technicality (i.e. because they didn't register!) I disagree that responsible PRS L/Lords should face such SL FINANCIAL costs - for L/A's to deal with a minority of rogue L/Lords! It's unrealistic to think Tenants won't suffer increased rents somewhere along the line as a direct consequence of additional costs to L/Lords. Certainly in recent years with such additional taxation, inc'g UNFAIR taxing of 'gross' income! ALL Cov. C/Tax payers have to contribute to the Council's overall costs in dealing with rogue Social/other tenure tenants, plus the shortfall % of C/Tax NOT paid. Why should ALL suffer because of a few? The huge number of additional properties now added (above just St. Michael's ward, originally proposed) are not all justified within the criteria put forward! E.G. Walsgrave - Mount Pleasant. This is an area of HIGH demand, NOT low (in view of UHCW staff demand) and property prices are relatively much higher as a result. Also, its Crime rates include Shoplifting reports related to Asda - reported as "at or close to Turlands Close". The criteria within Govn't regulations specifically refer to CRIMES COMMITTED BY TENANTS, hence Police figures do not distinguish - and, therefore are not an accurate reflection of such crimes, so such raw data should not be used. ASB - Unless you can break down such actions between Social/PRSTenants, Owner/Occupiers or other tenures, it is not acceptable to ASSUME that such an area is automatically down to PRS Tenants. IF the scheme goes ahead, I strongly disagree with at least one of the "discretionary" criteria which the Council are considering for 5 yr Licence Applicants - i.e. that, if you apply Co-Regulation (at a discounted Fee) with a

Landlords Association, that the L/Lord must not only be a member of it but must be an ACCREDITED member of such. This will entail yet FURTHER additional wasted costs - when all relevant knowledge is freely and easily accessible to responsible landlords - and they are likely to be at least of the same, if not a higher, knowledge level as Accredited L/lords! I strongly agree with Licence Holder's responsibilities WHILST the property is empty. They can't be held responsible for ASB by Tenants/visitors IF they're not aware of it! Also, if L/Lords identify pest/infestations NOT there at outset of tenancy, they should be able to reclaim costs from irresponsible Tenants to remedy this, IF down to Tenant's failure to maintain property as received. Coventry Council has chosen to use the Census 2011 for it's PRS rentals ratio of all properties per LSOA, as allowed by Gov'n't. However this is ludicrous when a) it's SO outdated, in view of the massive increase in student numbers alone now residing in Coventry since 2011 b) it already holds more recent information from Tenure Intelligence gathered within annual updates. Re: the thousands of students residing here. They are not legally obliged to pay C/Tax yet they cost taxpayers here £1000's in regular clean up operations, dedicated free furniture collections, etc. Cov Council chose NOT to levy all the developers of tailored student blocks/skyscrapers which have and are shooting up around the C/Centre - because it didn't 'bother' getting around to resourcing the task! This revenue could have contributed £m's towards the reduced coffers in it's hands! Poor decisions which the Council face no accountability over! There is NO transparency within the figures you've produced per LSOA, should the public try to audit them. A FOI submission was dismissed with "the data already being available" - this isn't so, since LSOA's can be split by postcodes or between streets themselves. No prosecutions were made over the previous years when the Council DID have the financial/staff resources to deal! For such a high ratio of areas in the city now being included in the proposals. it would be more sensible to await the outcome of the current Government Review on SL, due to report very shortly! 3/20/2019 7:52 PM

- 6) This is a welcome if long overdue initiative. It is very necessary given the number of rogue landlords operating in this city. On behalf of the local residents' association of which I am chair I wholeheartedly endorse this scheme. 3/20/2019 5:54 PM
- 7) Houses are not the problem, people are the problem. If licencing goes ahead - it should be per-landlord not per-property. Licencing each property a good landlord owns is not going to make any positive difference to the quality of private housing. The council already has enforcement powers to prosecute 'bad landlords' and licencing good landlords will not stop the bad ones. They do not come to the meetings, they do not get gas safety certificates, they will not licence their properties either. Last year I attended a meeting on homelessness with the council and now we're talking about a licencing good landlords which will cause many to exit and will increase homelessness. Before licencing is considered, landlords need to be provided with better support from the council on matters such as anti-social behaviour - we simply can't control our tenants behaviour with

the toothless legal system we have. I have shared accommodation for working people, where tenants sometimes end up being untidy, start smoking or have their TV on loud. s8 needs evidence which is practically impossible to gather. We can threaten to evict them with a s21 but then the Citizens Advice tell the tenant to wait until a court balliff comes to evict them. Don't do this please. 3/20/2019 12:17 PM

- 8) it is unreasonable to expect landlords to be able to deal with antisocial behaviour, pests and rubbish when these are tenant issues. 3/20/2019 11:14 AM
- 9) A lot of the things you are asking are often out of the control of the landlord. For example he/she can make provision for the property to be secured with a front door and key, but they cannot be held responsible if the tenant does not lock it... or in the case of infestations... if the tenant throws bread out and it attracts rats or cockroaches, why should that be the responsibility of the landlord? I have known the council not collect rubbish weeks on end... rubbish gets everywhere with the bins full... including food... without leaving a reason on the bin. Our street is often in a right state because of this. Leave bin collection rules on the bin! I am sure tenants agree that I am a good landlord. They are always keen to stay another year. There is a fine line between traipsing around for inspections all the time and their right to quiet enjoyment of the property. I am very against the proposals you have regarding licenses. It will mean rents will need to go up... or if they can't go up... then less rented accommodation. How about employing more bin men instead... or at least holding them accountable for not collecting bins? There is no need for extra red tape... just act on complaints from tenants... If you don't get many, there can't be many rogue landlords. If you are getting a lot of complaints, put your energies into fining the rogue landlords instead, and help those poor tenants, instead of putting the vast majority of excellent landlords backs up. By the way... Are you proposing to do anything for the good landlords to protect them from unscrupulous tenants? I have a letting agent to make sure I comply with the law. It is getting necessary with the extra rules and regulations. Some will be going to the wall with the inability to charge fees. Will you be taking their place and acting on our behalf? You are certainly going to be just as expensive... so no thanks... I pay for being vetted already... don't need duplication of effort... what a waste of time! How about a hotline instead for both victims of rogue landlords and victims of rogue tenants? This would be a good service... helping those in need would potentially make you very popular instead. 3/19/2019 11:37 PM
- 10) I own two rental properties in Coventry, both are 2 bed terrace properties in Waveley Road and were built in the 1990s. They are managed through a letting agent as I live near Guildford and I pay a management fee for this. I have spent thousands of pounds ensuring the properties are well maintained which have included new kitchen, bathroom, carpets, windows, front door, heaters, fencing etc. I have been told that I spend too much on them but I wouldn't expect anyone to rent somewhere I wouldn't myself call home. Whilst I welcome a tighter control on rogue landlords (and there are quite a few in Coventry from when I used to

rent there) I do feel that I'm paying money for something that I'm paying my letting agent to do. They ensure I comply to the regulations, got an electrical certificate, deal with any issues with the properties and keep a check they are being looked after by the tenants. Could the council not look at doing spot checks via letting agents and look at imposing licenses to those landlords that don't use them? If I look at how much rent I've received against how much money I've spent on the usual outgoings (mortgage, insurance etc) along with what I've spent ensuring the properties are well maintained I know I've made very little (especially when you look at the changes with tax). Changes to fees and the introduction of this license will see an increase in rent as landlords and letting agents try to see how they can make it worth while continuing. For some parts of the survey I didn't feel that what you were asking a landlord to be responsible for was fair. For example a tenant when renting a property is responsible for ensuring the outside space is looked after (grass cut, borders maintained) along with cleaning the windows. The outside of the houses I own were tidy before they were let and I expect them to be returned that way. I'd like to know what the council intend to do to help landlords with rogue tenants? What about a register for tenants? They pay a one off small fee to register, a landlord at the end of the tenancy can give feedback on rental payment and how the property was left. Likewise the tenant can give feedback on the landlord/agency on how efficient they were in resolving any issues etc. Will the license fee go up each year if the council find they are having to carry out more work in relation to rogue landlords therefore penalizing compliant landlords who will end up carrying the cost. I don't believe the immediate area my properties are in are in a deprived or high crime area which seemed to be part of the criteria for being chosen. The housing stock isn't old and the vast majority of properties are very well maintained. I will watch with interest to see what happens next but fear that I'll have no choice but to increase rents to help cover the increase cost landlords are facing. 3/19/2019 10:54 PM

- 11) Resources must be allocated to maintain standards. Adequate car parking facilities conditions to stop congested road parking that cause traffic hazards for pedestrians and other road users. Follow up on shopping trolleys at HMO'S. Proper Management of Bicycle Parking. Window curtains must be presentable and in keeping with a residential area. 3/19/2019 10:22 PM
- 12) If this is something Council wishes to implement it should impact every landlord and not only selected areas. Also as this is a proposal Council believe is needed there should be no charge/fee for gaining a licence. Currently there is too many additional costs to landlords and less support given (tax reduction scheme). In my opinion this all will impact further rent increase. 3/19/2019 10:06 PM
- 13) I don't agree with a licence fee. Have a licence for landlords to keep up with all checks and paper work but if a landlord keeps up to date why pay a fee. If they fail then yes fine landlords 3/19/2019 9:15 PM

- 14) I totally disagree with this ridiculous scheme. 1) most suggested criteria of the license is already covered by other legislation. 2) why should landlords have to pay for this? 3) Coventry Council squeezing money from hard working people yet again. 4) why is it only certain areas? No consistency. Why can landlords outside the highlighted areas not be penalised too? Post code lottery. All on all a total joke of a policy. Hang your heads in shame. 3/19/2019 8:45 PM
- 15) It most definitely needs to be extended geographically to include significantly more of the Hearsall area, including Bristol Road (my road), Kingston Rd, Sovereign Rd, Centaur R, Broomfield Rd, Collingwood Rd, Ludlow Rd, Kesington Rd, Westwood Rd and the entirety of Melbourne Rd, not just some of it and possibly Coniston and Highland Rd too. Basically all other roads in Hearsall area. There are a good number of houses of multiple occupation throughout this area including one a couple of doors down from me. Virtually all the houses in a complete row of them surrounding mine have been turned into buy to let or are now let out. This is vastly different to how it was just ten years ago when I first purchased my house when the majority were then owner occupied like mine. Some of these have been converted to increase occupancy dramatically, meaning what were small two bedroom terraced houses are now five bed but within the same existing structural space. There are a few decent landlords but the majority just do not seem to care about their properties as long as they are raking in the money and tenants and neighbouring property owners are left to pick up the pieces, putting up with squalor and forking out both in terms of time and money. Far too many landlords are basically deplorable. I witness it all the time and am surrounded by their ineptitude and all too often, total lack of care and consideration. 3/19/2019 7:55 PM
- 16) Agree with the principle but landlords are not the problem with anti social behaviour in high rental areas I also don't think landlords should be paying more stealth taxes I pay tax on my earnings from rent this is just another tax so the council can pay for the 40 people they will employ to run housing enforcement shocking 3/19/2019 5:42 PM
- 17) It seems to be an additional cost for compliant landlords, stringer checks on landlords not fulfilling their duties would be better 3/19/2019 3:32 PM
- 18) We are not happy that Hugh road is not included on the map. We have seen an increase in rentals with currently 10 to 15 let boards being on the rd. We have found these properties bring a lot of rubbish fly tipping and issues with parking. Hugh rd has just seen 2 properties since Christmas changed from large family homes into HMOs. I request that our road and surrounding roads that also suffer be added onto the map. 3/19/2019 3:10 PM
- 19) I am confused as to why Hugh rd, Hollis, Bollingbrook and Humber rd are NOT included in the map. I live in Hugh rd and since buying our property 12 years ago we have seen so many family homes ripped apart from investors turning them

into rentals. Since Christmas alone 2 have been turned into hmo's. The street is full of rental properties and this brings a lot of litter, flytipping and a mess of the bins and zero parking. I would request that these streets are included on the map. Residents are not happy with the current situation. I believe you are using figures from the census from 2011 which is so out of touch with how the area currently is. 3/19/2019 2:41 PM

20) Totally disagree with this selective licensing scheme 3/19/2019 12:46 PM

21) These activities are being undertaken by our agents anyway. There is no necessity for the council to duplicate the process. Perhaps, it should be recognised that some agents will ensure that this happens (trusted agents) and exclude them. The process could then concentrate on landlords who do not use agents or use non-trusted agents. This should make the process more manageable and cheaper. It is better for landlords to be spending money improving their properties than purchasing licenses. 3/19/2019 12:45 PM

22) The licencing scheme should consider the difference between individuals renting out say 1 property versus those with a large portfolio. In cases with 1 property the landlord could be just starting up and in my opinion requires support and doesn't necessarily fall into "rogue landlord territory" 3/19/2019 12:09 PM

23) The basis of the scheme seems fair enough, however the pricing is done on a basis that makes it look like it is a revenue raising scheme, RATHER than a scheme to actually improve the standard of housing in the area. There are also inadequate resources for enforcement and indeed anti-social behaviour prevention, and thus a lot of this will be lip service rather than make a difference, which is what is needed. Bad landlords need to be removed from the PRS - Bad landlords need to pay for this privilege with fines and confiscation/charging orders as necessary. Good landlords should not be subsidising enforcement, bad landlords have assets and these assets should be confiscated if necessary. 3/19/2019 9:35 AM

24) Coventry city centre maybe, outskirts no will ruin people's homes and make tenants homeless. 3/19/2019 8:10 AM

25) Seems unfair that this is at the cost of the landlord. 3/19/2019 7:32 AM

26) There are better methods to highlight rogue landlords. No help is given with rogue tenants, which will ruin the landlords credibility. This destroys affordable housing in the selective areas. 3/19/2019 7:27 AM

27) I am against the proposed scheme as I believe it punishes compliant and good landlords. The good landlords will be the ones that end up applying for the licence and will end up paying the high fee. I believe that rogue landlords will not end up registering for the licence and this will need to be enforced at the expense

of good landlords. Due to this I believe that if you do bring in this scheme that the proposed fee and penalty should be higher for unlicensed and non-compliant landlords. If you increase the fee for non-compliant landlords it means you can decrease the fee for compliant landlords which I feel at £380 is too high. There should be discounts for compliant landlords with multiple properties - please consider doing this. I believe you should licence the landlord rather than the property so the landlord only has to obtain one licence. It should not be 1 licence per property. 3/18/2019 11:49 PM

28) I am against the proposed scheme as I believe it punishes compliant and good landlords. The good landlords will be the ones that end up applying for the licence and will end up paying the high fee. I believe that rogue landlords will not end up registering for the licence and this will need to be enforced at the expense of good landlords. Due to this I believe that if you do bring in this scheme that the proposed fee and penalty should be higher for unlicensed and non-compliant landlords. If you increase the fee for non-compliant landlords it means you can decrease the fee for compliant landlords which I feel at £380 is too high. There should be discounts for compliant landlords with multiple properties - please consider doing this. I believe you should licence the landlord rather than the property so the landlord only has to obtain one licence. It should not be 1 licence per property. 3/18/2019 11:08 PM

29) It is penalising good landlords. 3/18/2019 10:25 PM

30) Scrap the rip off scheme and concentrate on rogue landlords 3/18/2019 8:38 PM

31) It seems that 'good' landlords are being asked to pay for the policing of 'bad' landlords. It is difficult to answer some of the questions due to lack of detail of the proposal. All of the things that are being identified that the licence is going to cover (gas cert., electrical safety etc) are already, or soon to be legal requirements anyway so there seems to be duplication. Why should housing associations such as Whitefrairs be exempt? Some of the quality of their housing is terrible. It sounds very complicated and almost impossible to police and will add pressure to council's resources. Rouge landlords won't bother so you will be targeting those that register, which will be the reputable landlords so just sounds like a stealth tax Any increases in costs forced upon landlords will just be passed directly to tenants in the form of rent increases, so again, those that have the least will be asked to pay up. Plus it will put even more upward pressure to increase LHA levels to cope with the increase in rents. 3/18/2019 7:17 PM

32) This is punishing all landlords for the sake of a few bad ones. I object vehemently to be forced to pay for a full time team of 40 Staff who's sole purpose in life adds no value to me as a landlord. Demanding EPC D is over and above our legal obligations also. The area covered by this scheme is massive, it should be targetted at a few specific problem streets within problem Wards. The costs to landlords of implementing all of the requirements of this scheme is unacceptable

in my opinion. I also disagree with the way the deadline for responses has been promoted. Reminders should have been issued with direct links to this survey. It's almost as if being given the opportunity to attend the presentation meetings was being deliberately promoted as being the official method of feedback. 3/18/2019 6:31 PM

33) The aim of improving the quality of private rented accommodation (PRA) is a good one and I support this. I echo all the points that the Residential Landlords Association has made in its response to this Consultation. The Council has plenty of powers already it can use to enforce standards. Legislation is constantly imposing further regulation on landlords and giving tenants greater powers. For example, the Fitness for Human Habitation Act comes into force on the date that this consultation closes. It is not clear to me what the Council wants to do that is not already provided for in legislation, or likely to be forthcoming shortly. I do not support the approach of selectively licensing specific areas. This is because it does nothing to improve the quality of PRA outside of those selected areas. This approach may lead, over time, to an increase in poor quality properties in non-selected areas. A consistent approach over the whole city that treats all landlords and tenants fairly, is better. The justification for linking PRA to other goals of reducing ASB, crime and deprivation is tenuous. What evidence is there that it is landlords or tenants from PRA that are causing this. For example, many of the selective areas identified also have high incidence of social housing. It is not the role of a landlord to reduce these impacts and it is not appropriate that a licensing regime, with its attendant sanctions, could be imposed on landlords for tenant behaviour that they cannot control. We have recently seen the Government's unnatural imposition of the 'right to rent' check defeated in the courts. Further, the identification of areas that are to be covered by selective licensing and those that are not seems to be rather arbitrary. Taking Foleshill as an example, some streets with a high proportion of PRA are excluded. The costs for a new licensable property are significant, especially for a one year license, and it is not realistic for landlords to absorb this. This will negatively impact the affordability of rental housing stock. It may also lead to some landlords selling up, which will reduce the available rental stock and put greater pressure on rental prices. It is also a deterrent to bringing unused stock and new rental housing stock into use. The Council should acknowledge that it is likely that licensing will push up rental costs in the City. How would the Council measure success of the scheme. I understand from the drop in session that the Council intends to create a team of 40 to administer the scheme. This is a large cost base and the Council should consider how it will justify this cost which will probably be borne by tenants. It will also be administratively burdensome for the Council and for landlords. Can the Council point to other cities where schemes have been implemented and show how these have improved standards. While I recognise that it is outside the scope of this consultation I feel it is important like to understand what the Council is doing to address issues with social rented sector properties. Also, for leasehold properties, what is the Council doing about regulation and enforcement action against freeholders that are responsible for common areas. In my experience

poor freeholder property management is often a cause of ASB, crime and flytipping. I do support education initiatives. To this end, the Coventry Landlord Accreditation Scheme (CLAS) could be a force for good, and give tenants confidence that they are dealing with quality landlords and property managers.
3/17/2019 10:10 PM

34) Strong object. 3/17/2019 8:45 PM

35) I own and rent out just two modest properties. One is rent controlled and occupied by elderly and very long-standing tenants who do not wish the upheaval of modifications to the property. I hope such factors will be taken into account in determining compliance. 3/16/2019 10:54 PM

36) Anything that would make private landlords accountable for the behaviour of their tenants is to be welcomed. We have suffered the blight of litter and noise nuisance for long enough. 3/16/2019 8:21 PM

37) That the council make sure any reports of antisocial behaviour are acted on immediately and not left to simmer for years 3/16/2019 11:24 AM

38) Not necessary and is a money making, vote catcher for the council 3/14/2019 12:13 PM

39) I don't understand when one part of Repton Drive is under the pink zone, but another part of the SAME road is not! How could anti-social behaviour and other aspects of Selective Licencing Government criteria be split part of the same road?! Also, Burnaby Road is not easy to rent out due to it being a very busy road. How is increasing the cost of rental (whereby the rent would increase as the cost of the licence would be passed onto the tenants) be beneficial for all concerned? How come Owner / occupier properties are not under the same criteria of waste management and infestations as landlords. We, as landlords are sitting ducks and this is "free" money for the council"! Landlords cannot be held responsible for the behaviour of tenants and how they live (in a messy or neat way). It is the tenants' human right (up to a point) to live as they like. You are making landlords become "police" and "headteachers"-like for tenants. Tenancy holders are adults and not children to be managed by landlords. 3/14/2019 11:51 AM

40) The current scheme has a deeply flawed methodology, would not work with, but penalise some good landlords, would be unfair in its application and would not achieve its objectives. 3/14/2019 10:30 AM

41) the council takes enough of the local population's money, they should send officers out to each individual private rented property and inspect it then decide whether the landlord is taking advantage of tenants or not and they should be not be allowed to have a licence until it is rectified. Up to spec rented properties

should automatically receive a license as a stamp of approval but not at the stupid prices you have proposed. Most are not criminals why don't you spend more time fighting real crime like the problem with knives and violence at the moment instead of finding ways to make easy money. It's ludicrous and obviously, I know the majority of people will feel this way. Protect your local communities and don't punish those who are trying the help with the housing crisis you have created. 3/12/2019 6:01 PM

42) I have a couple of issues. The evidence for meeting the criteria for selective criteria seems to be largely based on 2011 Census returns. Much has changed in some areas over eight years. I am surprised that very little of Lower Stoke has been designated whereas Stoke Park in Upper Stoke has. This seems so absurdly wrong (as any visit to either of these areas will immediately demonstrate) as to be almost ludicrous. If evidence for anti social behaviour is gathered by counting complaints from residents then it should not really need pointing out that articulate, first language English speaking, well educated permanent resident members of the community are far more likely to go through the processes of complaining to the council than temporary residents in rented accommodation or those whose first language is not English. Apart from that, this is a splendid move and one that should have been made years ago. The Council has had powers to do this (and other things) since 2004 - shortly before complaints starting being made about the disintegration of communities and the slumification of neighbourhoods. I was one making those kinds of complaints.. What kept you? Still, better late than never and if this move is a direct result of Mr Chowns' appointment, then what a good appointment it obviously was. Get to it as soon as possible. 3/12/2019 4:03 PM

43) It is essential that it is enforced. Badly run rented properties make life a misery for other residents and it is really difficult to get any response from tenants landlords or agents or the universities the universities need to be forced to take more responsibility for the behaviour of their students 3/12/2019 9:41 AM

44) It shouldn't be selective. All rented properties should be licensed 3/12/2019 7:51 AM

45) Badly managed rental properties pose an increasingly serious threat to the welfare of local communities. The scheme is an excellent and long-overdue move. BUT will there be enough resources devoted to enforcing it? 3/11/2019 4:48 PM

46) I am a landlord and a resident of Coventry. Not just a landlord. I am responding as someone who manages a tenancy and who lives next door to a rented student house in multiple occupation. I think the scheme is very good in principle. But the boundaries of the scheme should be extended. I believe that the whole of the city should be included. This will ensure fairness, hopefully raise standards, and avoid stigmatising certain areas. 3/11/2019 10:50 AM

47)It does not cover Lower Stoke 3/10/2019 5:04 PM

48)Make sure it is viable and works!!! 3/10/2019 11:18 AM

49)I am disappointed that it does not apply city-wide. Just because an area is deemed to be of a better standard it doesn't mean that individual rented houses are in a good condition or that the residents are not causing a nuisance. 3/9/2019 11:57 AM

50)This, like many council schemes is badly worked out making the responsible person pay for the irresponsible, it is only likely to push rental prices up, the council must be mad if they imagine that landlords can afford to hand out the sort of money that is being asked for for these licences, let alone the extra costs that will surely be incurred to ensure the licence is granted. How will landlords be judged ? I'm sure that many good landlords There must be many responsible landlords like myself who rely weekly on the income from their ONE rented property, I am on benefits & can not afford to pay out £400 or more in one lump sum, it is disgraceful to charge in this way. What will the council be doing with the expected lump sudden lump sum,just putting in the bank to pay the wages of another 22 employees for 5 years !! In all the documents I have read from the council on this matter there is no consideration shown for landlords, no suggestion that the money being proposed could be difficult for many landlords to find. This is a political decision driven by Labour's view of landlords as greedy, mean, rich, villains, taking advantage of the poor , & the disadvantaged in society. The council officials live in another world with their high salaries, benefits, & comfy chairs ! Maybe they consider £400 or more to be 'pocket money' but for many people it is a lot of money. If the council consider that a licence would work out to be only £6 a month then there should be that option, to pay £6 a month. There should be some provision for lower payments for poorer landlords, like council tax. Where should I get £400 from, just take it out of my child tax credits ?? This is the same as 'congestion charging' where richer landlords & large companies can have a chance of paying these outrageously high fees, but the many who rely on rent from just one property will struggle to pay. The unfairness of the scheme is highlighted by the fact that responsible poor landlords like me who are providing good accommodation in certain areas are expected to pay hundreds of pounds but bad, rich landlords with properties in other areas of Coventry won't need to pay anything !! Clearly the council has other options to address the various problems outlined in the Feasibility Report , but it is clear that the council sees the selective licencing as the cheaper option, shifting responsibility for fairly vague problems to landlords, whilst abdicating it's own responsibility to the public . The report acknowledges that Selective licencing in itself will not 'cut burglary rates' or 'stop criminal damage' , neither can landlords stop people fly tipping !! The council , & the police clearly already have the regulatory facilities to address the social issues that are highlighted in the report, this is not the job of landlords, & it's hard to see how licencing landlords will

address the problem of 'fly tipping' . Overall this is a disgraceful random attack on many people for no good reason, & reminds me of the phrase "taking a sledgehammer to crack a nut" My property is in fact in Manor farm , which has recently undergone extensive improvements to the properties both private & housing association owned, & also thousands of pounds spent on the roads, & public areas, so why would it be included in this selective licence ? 3/7/2019 5:53 PM

- 51)I welcome the Scheme and hope it will have the desired effects on the housing stock in the city. 3/7/2019 1:39 PM
- 52)I think its just another way of victimising landlords who in the main are providing housing to many individuals and families in coventry. The council do not have enough housing stock of there own and would be in dire straights without these landlords. If there are rogue landlord reports to the council they should deal with them on an individual basis. If the council did not waste monies in other areas such as problematic godiva festival and else where in the city they would have the resources for staff to help track down and prosecute rogue landlords out there. Maybe a small campaign to highlight to tenants in Coventry to contact the council if they feel the landlord is being rogue in any way, but at the same time don't come down on landlords for petty issues. Don't forget that without the private landlords in Coventry (In the main "NOT ROGUE") the council would be in a much worse housing situation than at the moment. 3/7/2019 11:20 AM
- 53)Will email Adrian Chowns 3/7/2019 9:41 AM
- 54)There should be a controlling body that tenants can go to for a quick resolution if the land lord fails in their duties. This department should ensure that the land lord cannot bully or intimidate the tenant for reporting them. 3/6/2019 8:31 PM
- 55)what about people already in accommodation, will they get a visit to see if their property is safe. 3/6/2019 7:55 PM
- 56)Anti social noise 24/7 is a big issue for home owners especially from student lets in residential areas-emphasis on restrictions and penalties to such should be maximised as a priority 3/6/2019 7:34 PM
- 57)I believe that Bolingbroke, Hugh and Hollis and parts of the Ball Hill area should definitely be included based on more recent statistics which would more than adequately fulfil the criteria. There have been a major increase the lettings in these areas since 2011, not to mention Bolingbroke voted as worst street for fly tipping in Coventry and currently 12 student let signs visible. 3/6/2019 11:17 AM
- 58)I have to look at an upturned telephone kiosk in the rented accommodation across the road. They breed dogs which bark day and night. Have already been taken to court. Stoke park residence complain continually. It's a disgrace.

Landlord has been approached to no avail. Skips overflowing..smell horrendous.
3/6/2019 8:54 AM

59)It is suggested the council will help out with difficult tenants, but there is nothing in your documents to support this. e.g. tenants who fail to properly heat homes and cause defects by this. 3/6/2019 12:32 AM

60)There are problem rental properties outside the areas on map.. Why don't the proposals apply to the whole city? 3/5/2019 9:17 PM

61)Provide access to selective scheme for tenants 3/5/2019 7:40 PM

62)This is an excellent idea, but should only be a start. I used to live on Humber Avenue but had to sell and move area due to the almost constant antisocial behaviour and unneighbourly conduct from the occupants of HMOs on the street. Rubbish left out on the street, loud parties until 5am, students speeding in cars, crime, police not interested. The landlords do not care and the proposed fees / fines will make no difference to them. I sold my small 2 bed house and i understand it has now become another HMO, after building a huge rear extension it is now a 6 bed HMO. Cov council refused planning twice but the landlord has built it anyway and it is now fully occupied. The landlord receives c£36,000 pa income from this letting so a charge or fine equal to 1 or 2% of annual turnover makes no difference. 3/5/2019 7:08 PM

63)I would like to see the Scheme extended to worse hit areas, all of st michael's ward, lower stoke and upper stoke. Without implementing this properly the council are missing some of the most effected residents! 3/5/2019 6:04 PM

64)We live with student noise a lot, gladly not this year, but Landlords usually just ignore our complaints, as do the Council too. It can be hell on earth sometimes and noone cares. 3/5/2019 5:52 PM

65)There is no doubt that a minority of landlords in Coventry have not been looking after their properties, or giving tenants a fair deal. The licensing system, properly enforced, will go a long way to improving the city's rental housing stock. It's long overdue. 3/5/2019 5:35 PM

66)I am a private landlord in Coventry. I have always kept my property in an excellent condition and provided an excellent service to my tenants. I deal with all issues promptly. The tenants are fully checked and I always respond to their calls within a few hours. I feel as though I am being unfairly penalised because my property is within the boundary of your scheme, and other landlords are more unscrupulous. I don't think it's proportional to my own experience as a landlord. The Council has other sanctions within its power for all the issues you are referring to such as anti social behaviour, noise, HHSRS and these should be used first rather than charging responsible landlords. There is little evidence to

show that this type of intervention improves housing conditions and long term behavior of landlords and as such should not be introduced. I am not happy and if this charge is introduced I will pass it directly to my tenants. I suspect other landlords will do the same. The unintended consequence of this is that vulnerable residents will have their rent increased, and may not be able to afford their homes. Even £10 per week increase can put families into poverty which most landlords won't care about, and may lead to homelessness. I feel you have not considered these issues, and do not understand landlords. Please consider using your existing enforcement powers first. 3/5/2019 4:12 PM

67) Do you have plans, as regards the number of unoccupied properties in the proposed areas for the Selective Scheme 3/5/2019 2:40 PM

68) Landlords should be responsible and accountable for everything concerning their properties and their tenants including security, safety, hygiene, maintenance, appearance, cleanliness etc 3/5/2019 1:43 PM

69) The sooner it is actioned the better 3/5/2019 1:34 PM

70) Very pleased to see licensing introduced, hope it's extended to other parts of the city after a trial period. Landlords are having difficulty letting property, one says it's no longer worth letting a 3-bed house, over 5,000 purpose-built student rooms are being built around the city centre, so I hope to see many privately-let houses being sold back to private family owners. 3/5/2019 1:03 PM

71) No 3/5/2019 1:02 PM

72) Quicker it's applied the better, 3/5/2019 12:38 PM

73) N/A 3/5/2019 12:00 PM

74) The area and roads around and including Bolingbroke Road in Stoke are always subject to fly tipping and lots of student lets which are very messy and not looked after. With over-crowded properties and constant local press for its general state. Most caused by poor landlords/landlord control. Can discussion please be opened as why this area is not covered. It is one of the worst areas in the city for poor management of rental properties. Thank you. 3/5/2019 11:52 AM

75) It shouldn't be selective - it should be every single HMO. They are turning areas into complete and utter dumps. They should all be licenced AND a bond of £10k placed with the council - if they do not upkeep the property or the surroundings, money should be taken from this bond to rectify the issue. If the bond money is used, compulsory purchase the property. HMOs have turned many areas of Coventry into stinking dumps with absent landlords. 3/5/2019 11:04 AM

- 76) Disposal of cigarette butts is a huge problem as HMOs tend to have smokers who smoke outside and drop their butts on the pavement outside, causing a build up over time. 3/5/2019 10:59 AM
- 77) Being a Landlord is not something to take lightly, it impacts on peoples lives and if you wish to make your living from being a landlord you must be aware of this. As with any other line of business it should be about balance not just profit, if rents are set high then the standards should match them for everybody not just those in work but also those on benefits and assistance. 3/5/2019 10:10 AM
- 78) Yes. I live at the start of Melbourne Rd. Though the rest of the road is in the Licensing area it stops before it reaches my end. I've asked why but haven't been given a satisfactory answer. The licensing would help with the occasional poor landlords or clients. I would like a real reason as this can be a stressful experience for neighbours when inconsiderate tenants or neglectful landlords cause problems. Why licence half the street ? 3/4/2019 12:04 PM
- 79) I am a tenant of a property in Coventry and the property I live in is not in the selective area. Why should I not have the same standard as other tenants. You should either licence all or none. The landlords will pass the cost on to tenants. Why is it so expensive 3/3/2019 6:27 PM
- 80) Good landlords already comply with what standards are expected within the Selective Licensing Scheme. Bad landlords will continue to flout the rules. The scheme introduces another layer of bureaucracy for decent small landlords and will no doubt also increase rents to tenants to cover the additional costs involved. Surely it would be better to have some sort of scheme whereby landlords could pay a set amount each year per property (say £100) and this money could be used to fund and enforce the rules that are already in place such as gas safety certificates, electrical certificates, etc. Action could then be concentrated on the problem areas of the city. We have been a small private conscientious landlord in Coventry for 10 years and this is just another layer of admin for us that now leads us to conclusion that we would prefer to get out of the rental sector. If this feeling is replicated it will potentially reduce the number of good landlords in the city and the number of good quality rental properties and do nothing to reduce the problems associated with rogue landlords who will continue to operate. 2/27/2019 12:18 PM
- 81) If these two schemes are introduced I will have to increase rent at my property or sell it. I will not be able to afford to keep the rent at the property the same if I have major expenses to pay for. I think the council should recognise that tenants will either have to pay more to rent, or will be evicted from their homes. If this is what the council wants, then fine; if not, the council should abandon these schemes immediately. 2/26/2019 5:37 PM

- 82) Immediate neighbours should be supplied with the landlords name or at least a contact person in the council with that information should be publicised 2/26/2019 4:43 PM
- 83) The questionnaire seems to be bias to block answers e.g. Copies of licences etc only has comment for all licences and not individual ones. Also does not have any comments about tenant responsibilities e.g. The tenant should also be responsible for vermin control 2/23/2019 7:52 PM
- 84) Already experiencing issues with neighbours in rented property 2/23/2019 4:29 PM
- 85) I live in an area with many privately rented properties and many are well looked after but there are some where the property is not maintained by the owner and the tenants do not behave well. Rubbish in gardens is a common issue and noise is another. A way for the Council to monitor landlords is very welcome. 2/23/2019 9:24 AM
- 86) Would the list of landlords who have a licence plus any related issues (ie if they are compliant or not with the requirements of the licence) be available to the public.? I live in stoke and am having my life blighted by a neighbour who a) was growing drugs at the property and b) has now rented the property out to tenants who inflict anti- social behaviour on the neighbours and run a huge dog breeding business from the back garden - I welcome these proposals and the sooner they are introduced the better 2/20/2019 7:51 AM
- 87) Yes! When does it come into play as our attached neighboured house is let out and isnt safe. Fire alarm battery has been beeing for over a year, boiler hasnt been checked since we moved in three years ago ect. 2/19/2019 8:26 AM
- 88) I think it needs to cover more of the student lets in Earlsdon. This proposal barely affect Earlsdon but there are large properties in sat Earlsdon Avenue North or Kensington that could do with falling under the proposed licencing scheme 2/18/2019 9:41 PM
- 89) This is an awful proposal. This is being done knowing full well that landlords will increase rents to cover the costs involved and will make even more people homeless. 2/18/2019 3:06 PM
- 90) This scheme and the additional HMO scheme are an absolute disgrace and will devastate renting in the city. I am a tenant living in a 3 bedroom house with 2 other tenants. The property currently does not require a HMO licence. The landlord has already told the tenants that if he has to pay for both these schemes, he will transfer the cost to the tenants or sell the property. Therefore, I will have to pay for these schemes or I will lose my home. Thank you very much Coventry Council, you are an absolute disgrace! 2/17/2019 2:42 AM

- 91) In order for a landlord to comply with the licensing terms, the landlord may now be open to accusations of harassment, for example how can a landlord ensure the outside areas are clean and tidy or deal with antisocial behaviour. When he/she does not reside in Coventry. This is a money grabbing scheme as you are now charging landlords for services they already provide. Granted there are a few bad eggs, why lump everyone together now. Also there is no provision to protect landlords from non-paying tenants. 2/16/2019 2:13 PM
- 92) Good landlords who work through Estate Agents will now be paying twice to be regulated. Rents will increase to pay these extra fees. Landlords cannot be held liable for the anti-social behaviour of their tenants - that is a job for the police. 2/16/2019 12:14 AM
- 93) Many areas have far, far too many student lets. It changes the whole area in a detrimental way. Especially if the landlords do not take care of the properties to maintain them and the gardens and surrounding areas. Many students choose not to live on campus in halls of residence as they are more expensive and restrictive. 2/14/2019 9:23 PM
- 94) Future plans to roll out to the whole city would be good 2/14/2019 5:35 PM
- 95) I disagree with the Selective Licensing Scheme in the way it is designed: I'd rather suggest that non-compliant landlords should not be allowed to hold a license at all. To increase the license fees wouldn't change the behaviour of such "bad" landlords at all. Rather, this could lead to the landlords passing the higher fees on to the tenants which would actually mean that tenants would still suffer from bad behaviour of their landlords, plus paying a higher rent. Also, I don't think it should be the obligation of a landlord to police the behaviour of her/his tenants. To me this is highly problematic, also, as there is no definition provided as to what "unsocial behaviour" exactly means. In any case, dealing with these kind of things should be a private matter of neighbours or, in the worst case, it should be up to the police to deal with. 2/14/2019 5:02 PM
- 96) The plan only covers areas where there is currently a problem it does not look to protect adjoining areas from the impact of the new restrictions. It would appear to be shutting the stable door after the horse has bolted. We should do the right thing and apply the regulation across the whole city 2/14/2019 3:29 PM
- 97) The RLA opposes the majority of licensing schemes throughout the country. The RLA argue that local authorities already have enough powers to enforce standards in the private rented sector. Licensing does not empower them further and often misses out on capturing the very people it looks to sanction. Selective Licensing cannot be used to raise the standards of privately rented properties by funding enforcement or training and engagement courses as it is not permissible for a council to make a profit on costs of licences. A council can only charge the actual administrative cost of processing licence applications which means that

the majority of the time will be spent on bureaucratic procedures rather than monitoring and enforcement. In addition, the RLA stance is that Selective Licensing is ineffective at reducing incidents of anti-social behaviour. Landlords are not responsible for the behaviour of tenants and attempting to impose a licensing scheme on them to resolve anti-social behaviour will not work; a stance that the House of Commons echo. A Selective Licensing designation may denote one or more of the following issues in an area: · low housing demand (or is likely to become such an area) · a significant and persistent problem caused by anti-social behaviour · poor property conditions · high levels of migration · high level of deprivation · high levels of crime Funds and resources should be directed at identifying and managing landlords are who not abiding by legislation and at the regeneration or improvement of the relevant areas. The identified problems could well mean it would be harder to obtain a mortgage to buy a property in these areas and therefore good rental properties are important in these areas. Expecting lawful landlords to pay for expensive licences will alienate lawful landlords as it burdens them with additional costs. Good landlords will apply for licences and may need to pass the cost on to tenants in the form of increased rents, doing nothing to address affordability, while the worst landlords who are operating criminally will continue to operate without a licence, below the radar. As an alternative to Selective Licencing, the Council should fully use the enforcement powers already granted to them by the Housing and Planning Act 2016, ranging from civil penalties, rent repayment orders and banning orders, rather than rely on Licensing Schemes to regulate landlords in addition to these powers. 2/14/2019 1:32 PM

98) Landlords are required to do these things already. This is a bit onesided what about rogue tenants? I know of a case where they only paid 1 months rent but it took 6 months before they were evicted by bailiffs. It took a skip to clear out the house. Cleaning estimated at over £300. Considerable damage to the property broken doors windows and toilet. All blinds will need replacing. & months worth of household refuse in a shed. Cost of making the house habitable will be thousands. No chance of recovering unpaid rent. They also didnt pay council tax, gas electric or water. 2/14/2019 12:49 PM

99) Selective Licensing has not proved to be successful in removing bad landlords from the market, but penalising good landlords for following their legal obligations. Parts of Selective Licensing put tenant obligations to the landlord. Selective Licensing is very expensive for landlords and is another reason for good landlords supplying good quality properties to exit the market which in turn reduces much needed affordable housing. Licensing Landlords is a great in concept, but does not do what its supposed to do. 2/14/2019 12:15 PM

100) I think there is potential for this to extend to other areas outside of the proposed boundaries. i.e parts of Upper Stoke & upper Wyken. 2/14/2019 10:19 AM

- 101) The evidence base for choosing the areas selected is relatively old. The evidence base should be reviewed as soon as more up-to-date evidence is available. 2/11/2019 10:20 AM
- 102) The scheme is not necessary as the Council already has powers to deal with rogue landlords. 2/8/2019 11:15 PM
- 103) I am disappointed and annoyed that I have not received any information regarding this latest proposal from the council, despite completing previous questionnaires, making applications for HMO's, attending meetings and registering details. The council have managed to contact me previously in connection with being a landlord. It is only because I am a member of the NLA that I came across the information. How on earth are the majority of landlords expected to be reached and have their say? It looks very unprofessional and badly thought through. I have serious doubts that there will be enough qualified and experienced staff to competently implement the licensing within a satisfactory timescale and address those that need to be made compliant, ie, the rogue/unresponsible landlords. I fear the brunt of the costs will fall to the already compliant and responsible landlords. There should be no upper cost limit for non compliant landlords trying to evade the license or breaching requirements. 2/8/2019 3:54 PM
- 104) If the scheme is to be brought in it needs to cover the whole of the city, not just small areas. If these are standards you think should be implemented they should be implemented across the whole city as a basic standard. 2/8/2019 3:42 PM
- 105) Please include proposals that protect the landlord from tenants who don't pay their rents and make eviction easier when tenants breach their AST contract. Not quite sure how Landlords are to prevent tenants from antisocial behaviour. 2/7/2019 7:26 PM
- 106) The licence fee is too high and is simply going to lead to higher rent for tenants. Rented property is already highly regulated by central government and rogue landlords will continue on an unlicensed basis. The proposed boundary makes no sense. 2/6/2019 8:30 AM
- 107) I believe this fee would be a further burden on private landlords who are not all wealthy and could drive many to sell properties or not rent at all anymore. Those of us who are maintaining good properties seem to be penalised with those landlords who do not. 2/5/2019 6:38 PM
- 108) I look forward to seeing the results of Selective Licensing in Coventry. How will you ensure it is managed and enforced robustly as possible,? Will tenancy agreements and the conditions of Selective Licensing for the Landlords be made available in different languages due to the diversity of this city?. Any agreements

for tenants should be in hard copy as many people still do not have access to computers. Also it maybe worth considering supporting landlords to provide some of the basic tenancy information/tenancy conditions in a pictorial format and in very simple plain English as there are many people who cannot read and write or understand English. The simpler the information the better as there is more chance they will adhere to the agreement, It might be worth considering providing this to the landlords too for the same reason, I am very supportive of the scheme as landlords do need to take responsibility for their properties and be made to provide a good standard of accommodation for their tenants. Will you be considering any othr areas of the city? As some of the areas located on the edge of t he pink circle may not be maintained as well. Some landlords may take advantage of this and gradually creep into these areas. I am supportive,

- 109) 2/5/2019 1:44 PM A lot of the proposed measures are already in place, especially if the property is lent through agency. 2/4/2019 5:37 PM
- 110) No 2/2/2019 1:39 PM
- 111) Think about this - landlords can't control the behaviour of other human beings (tenants) like make sure there is no rubbish in the floor - which may be the cause of other problems. People living in HMO's do not need to see the rents go up further . Why don't the council come down on unlicensed properties not complying rather than taxing the landlords who do comply - easy money right ? 2/1/2019 11:49 AM
- 112) A very good idea. It will help improve standards and protect tenants from poor accommodation. 1/31/2019 4:32 PM
- 113) I am concerned that the proposed map does not include ALL of Cannon Hill Rd. nor Cannon Park Road. Cannon Hill Rd. has many HiMO's that are not looked after very well. 1/30/2019 4:50 PM
- 114) The area on Charter avenue does not cover the whole street fairly. This will lead to landlords either selling or buying houses that fall outside of the proposed zones and have a negative effect on private residents. 1/28/2019 1:52 PM
- 115) The license requires the landlord to do exactly what is already required by law! I think you should spend time / resources enforcing the existing legislation rather than re-creating duplicate regulations! Decent landlords will comply, the rogue ones wont register and will continue to flaunt the rules 1/28/2019 9:34 AM
- 116) Another way to penalise good landlords. How about transferring the full financial burden to the rogue landlords? Expecting landlords to be responsible for their tenants' behaviour is utterly unfair. We are not their parents. A good landlord might be unfortunate enough to get antisocial tenants. It is impossible for

landlords to control a tenant's behaviour and micromanage them. 1/26/2019 9:19 AM

- 117) I think the real purpose of the license is to raise revenue for Coventry City Council. It's not about tenant welfare. Most landlords are already providing the best they can for their tenants. My tenants live better than me! I strongly object to having to pay for a license. It just increases the cost of being a landlord and in the end it's the tenant that suffers because someone has to absorb all or part of the cost. All we end up with is housing conditions that we already have! 1/25/2019 3:47 PM
- 118) the fees you propose are far too high 1/25/2019 1:18 PM
- 119) The vast majority of landlords are already compliant. There are other, more effective ways to target rogue landlords than a blanket licencing scheme. A selective licencing scheme of such a scale will probably cause a lot of financial burden for portfolio landlords who will inevitably pass on some of the cost to tenants. Random checks on properties and intelligence based targeting if rogue landlords specifically is likely to yield better results. 1/25/2019 1:15 PM
- 120) Disapponited that my property falls in the area however houses behind my road of Farndale Avenue , dont, however its those houses too with tenants and lots more anti social behaviour and multi occupancy by Romanian families. I am planning to rent my house out as due to be working abroad. Landlords on my roads particularly no. 26 has scant regard for his property and the tenants live in terrible conditions. My property has had some major changes to ensure it is ready for a tenant ready for renting and now I feel penalised for now having to pay for extra fees. I hope that the scrupulous landlords on Farndale Avenue are challenged and I think you should extend the area to include all of the dales as you will only shift the tenants down the road and create more anti social behaviour. 1/24/2019 8:04 PM
- 121) I think the new licensing scheme is good and needed in many situations. However I feel that this may impose more responsibility on the Land Lord, and could be used by a tenant to avoid maintaining a clean property themselves. Also any disruption should be reported to the Council to enforce and not be the overall responsibility of the Land Lord. There responsibility will be in terms of responding to any breaches found. 1/24/2019 10:05 AM
- 122) I think it is wrong to select certain areas which potentially penalise good landlords. The fees are excessive and I would have to pass these on to the tenants. It would be better to ensure that all tenants are aware of the council environmental health service. I can not see that this will result in an improvement in standards. Licences should only be required when an issue has been raised by a tenant and the property is found to be in disrepair. A license should then be

required to allow the property to continue to be let privately. You should penalise the rogue landlords not all landlords. This isn't fair 1/23/2019 10:08 PM

123) Dear Sir / Madam 1. The selective map areas need to be further defined as they currently split certain rental hotspots. Also, HMO properties formerly managed by the Universities and now coming into private ownership by local landlords should be exempt from having to re-apply for planning permission. 2. Landlords / license holders with multiple properties / portfolios (e.g. 0-10, 11-50, 51-100, 101+) should be given discounted rates on all licenses. 3. Finally, tenants should also be made responsible for the upkeep of the property, as landlords / managing agents mostly live elsewhere and can be difficult to continuously monitor the property. A similar approach should be taken for tenants. Best of luck with the programme. 1/23/2019 1:31 PM

124) I dont think the Licensing scheme will make any difference to the standard of tenancies. This is an additional cost that will lead to a rent increase. The way to improve standards of tenancies is to ensure that private tenants are aware of the procedures that they can take with Council Health and Enforcement team to raise standards. Letting Agents should also be more proactive in this process 1/22/2019 4:51 PM

125) I don't think CCC are going down the right route, this will only lead to greater Homelessness, as Landlords are forced to remove Tenants for any reason in order to protect their license. The Landlord has little control 'How a Tenant lives and looks after the property' unless they actually move in with them or sit outside watching them all the time. Based on this scheme, rents will be forced up to pay for yet more needless bureaucracy, that wont actually improve the PRS as the majority of Landlords provide good accommodation. While Councils only decide to attack the landlords, and not deal with Poor tenants, you will not improve the PRS, but in this case, you will have more and more bad tenants forced towards the council as landlords sell up and accommodation disappears. I think the council should think very carefully about the 'Cause & Effect' of their actions and the bigger cost of homeless bills they will face as a result of this. I for one think its time to sell out of Coventry now, Landlords are facing such a big increase in Bureaucracy, costs, and taxation through Section 24, the PRS is becoming untenable as an investment. I had considered looking at further housing in the future to support Jaguar Land Rover, but now that investment is dead as a result of this licensing decision. 1/22/2019 2:16 PM

126) As a landlord in the centre of Coventry renting to students, i have witnessed both compliant and non compliant landlords. And i welcome that all landlords should be all abide by the standards proposed. However it will still not be a level playing field. The reason being is that the past few years, we have experienced problem tenants from 2 houses in particular, anti social behaviour, rubbish in gardens causing a rat infestation etc. These two properties are owned by housing associations. What are you doing to enforce that? 1/22/2019 11:05 AM

- 127) Assuming the landlord can control the exterior condition and anti social behaviour is ludicrous. How tenants use bins, drop litter, slam doors, cannot be controlled by landlords. We're not police. Condition of provided furniture... How?! You can't prove secondhand furniture is, for example, fire safe. And you don't provide new furniture with every tenancy. The electrical certificate... This is just another expense. Unless there's a history of fires in properties due to landlord neglect of electrical appliances, it's excessive. This doesn't go far enough to protect and respect landlords who much look after tenants, as their tenants would insist. But you do need to penalise dangerous and unscrupulous, illegal landlord practices. Please don't alienate the careful ones among us. 1/21/2019 10:53 PM
- 128) this pure racism as the areas covered are where there are the most foreign people and immigrants. 1/20/2019 3:29 PM
- 129) Some of the questions are mixed and therefore cannot be agreed with i.e. gas and electrical certificates - the former is a requirement but the latter is not 1/20/2019 3:14 PM
- 130) This proposal would be well received by residents living in areas where we have a (disproportionate) number of HMIOs. In particular withy regard to the maintenance of the property and the correct disposal of household refuse where, if the tenants are students, no Council Tax is paid and the costs are carried by residents not in rented accommodation. 1/20/2019 10:40 AM
- 131) The Councils ability to inspect and enforce any failure to comply with the agreed standards. 1/17/2019 11:02 PM
- 132) Restrictions in the number of licenses issued in any given area should be limited to reduce studentification of any residential area 1/17/2019 8:25 PM
- 133) Having to have true copies of the EPC etc rather than a photocopy seems a bit arduous. The licence is too expensive - equivalent often to a whole month's rent. This will push up costs for tenants. 1/17/2019 12:47 PM
- 134) The fees collected should also be used to enforce the conditions of the licence e.g maintenance should be carried out. Land loads should be provided with clear guidelines as to what constitutes a good state of repair. Tenants should feel protected and safe to report landlords Inspectors should have a good knowledge of where tenants can get additional support eg family hubs 1/17/2019 10:44 AM
- 135) another money making scheme by Coventry council. Area in Wavely road CV12pq selected is a modern housing estate. The run down area of Victorian houses in the same road not in highlighted area Why!!!!!!!!!!!!!! Oh perhaps we can get more money out of this bit. 1/17/2019 8:12 AM

136) Where to start everything you have listed in this "licence" is what is required by law and therefore should not need further applications to a council which have nothing to do with the landlord the fee is a ridiculous amount and should be no more than £100 it should cover ALL areas if this is going ahead because its discrimination for one council to make some areas pay and others not 1/16/2019 12:59 PM

137) Overall the scheme suggested would improve the standards of some of the properties within the area and the rough ideas are sufficient. I work within the residential letting of properties and general deal with standard lets on ASTs rather than HMOs. Our company has a high standard with our Landlords and Tenants to assure the property conditions but one of the main issues is finding suitable contractors who are responsible, reliable and understand the risks if they do not carry out the works to the agreed standard so perhaps there is a way that a further scheme could be set to ensure contractors are certified with the council too as well as their regulatory bodies? 1/16/2019 12:31 PM

138) you do not say how you will support landlords with antisocial and troublesome tenants, which is heavily promoted in the advertising of this survey. there is little about how you will get tenants to be good tenants. sometimes there is little a landlord can do legally or it takes a long time if tenants are a nuisance. i don't feel the landlord should pay for pest removal if it is caused by lack of hygiene of the tenants eg not putting rubbish out properly. there are also criteria you raise as possibilities of having a reduced fee eg if you are a professional member of a organisation, accreditation. I am considering becoming a landlord but would be a sole person with one property. I would not be joining any professional registration. they seems nothing about support for landlords with problem tenants. They can be just as much of a problem as bad landlords with poor properties. What will you do to enforce more poor tenant behaviour? I live next door to a rented house and they are no problem at all. It could be a different story altogether. There should be some sort of 'black list' or sharing of information on problem tenants to landlords to protect them and the property and neighbourhood before renting it out to anyone. anyone can falsify references. Also if you wanted to rent out to a member of your family or a friend, would you be expected to get references? I think this survey is heavily weighted towards bad landlords and not bad tenants as your information suggests you are also interested in views on. i agree that tighter controls are needed for bad landlords to improve housing. I think the fees (except £380) are quite a lot. you don't say what the stage 1 fee and stage 2 fee covers. 1/14/2019 10:03 PM

139) I totally agree with the Licensing Scheme but the fees seem excessive and will result in price increases to tenants which is not a good thing. 1/14/2019 4:32 PM

140) No 1/14/2019 1:20 PM

- 141) Fees is too high and the process is cumbersome 1/14/2019 12:16 PM
- 142) I already have one HMO which is licensed by you. I have paid for this by 1st October 2019 and haven't heard a thing since. Why should I now be in this scheme? Why should I pay you more for nothing? I am not a Police Officer, so why are you putting antisocial behaviour responsibilities on me? 1/14/2019 10:13 AM
- 143) Coventry needs more of its own social housing as an equal or near equivalent to the number of private landlords. This should be applied to residents of Coventry rather than yet more student accommodation. 1/13/2019 6:56 PM
- 144) Strongly against the selective licensing scheme. Rents will rise as result. Another Corrupt City Council initiative. This will add approx. £20 per room per month to most property rents. It will also lead to more rogue landlords as the requirements and costs of being a landlord increase. More landlords which will not declare being so. Short sightedness by this council as usual. This is a joke. 1/12/2019 7:29 AM
- 145) The council needs to be mindful that landlords often see a tenanted property as an investment. Tenants want to live in a decent home and be able to live in their home in safety and without harassment from their landlord. It is important that this scheme does not create hostility between landlords and their tenants. 1/11/2019 9:39 PM
- 146) how will CCC identify non compliant landlords and be able to penalise them? SLSs in other parts of the country have not generally improved areas, nor anti social behaviour. i CANNOT control my tenants behaviour in any way. i can include the legal consequences of any illegal behaviour they indulge in as part of my tenancy agreement, but i cannot affect their behaviour. I am not allowed inside a property without the tenant's permission. if they refuse permission many of your idealistic aims will be impossible to achieve. You do not know how many landlords there are in these areas, (bad landlords know how to hide) how have you arrived at these huge license fees which the 2004 Act stipulated you cannot make a profit on the fee structure. 1/11/2019 6:38 PM
- 147) Not sure this is the way forward. If it's too draconian Coventry may lose private rental stock due to landlords selling off houses that become unprofitable or in the case of accidental landlords, too problematic. This may also be seen as a way of persuading small landlords to give up by putting up as many barriers as possible to make life difficult. I can't see how a landlord can control the behaviour of any tenant or their guests. If they are antisocial how are they suppose to remedy this. Yes they can threaten eviction, but this is basically all they can do. It seems the council is intent on passing as many liabilities on to the landlord as possible and to collect money to not provide a service. In bringing selective

licensing you seem to declare all landlords are bad landlords when this doesn't seem to be the case unless you have figures to prove otherwise. 1/11/2019 5:40 PM

- 148) The scheme proposes landlords be responsible for the actions of tenants when keeping the property tidy and secure and keeping the property in good repair. This sounds fine if you have no practical experience of being a landlord. Tenants need an EQUAL obligation to report defects in a timely manner and maintain the property (ie ventilation to prevent mould, use of shower curtains/fans etc). The survey only proves that you live in a fantasy world where tenants are good and landlords are bad. 1/11/2019 4:55 PM
- 149) I feel it's unfair to charge landlords that have one or a couple of properties that don't run this as a business. I feel the fees are way too expensive 1/11/2019 4:01 PM
- 150) They should include that the landlords provide enough waste bins and let their tenants know what waste should go in what bin. 1/11/2019 2:38 PM
- 151) You expect landlords to do all this, but they have no real power to do any of it. if a tenant is being anti-social there is very little i as a landlord can do about it. I've been trying to get an antisocial, non paying tenant out of my property since they stopped paying rent (i last received payment on the 29th June). I've done everything in my power to get them out. they are a nuisance to the occupants of nearby houses, but there is nothing more i can do! 1/11/2019 2:16 PM
- 152) As a self employed contractor (electrician) in Coventry I regularly attend properties that are simply not fit for habitation. Many are extremely dangerous electrically and otherwise or simply do not comply with regulations. I would like to see it expanded further especially around student accommodation. 1/11/2019 1:47 PM
- 153) It will only work if the enforcement team is adequately financed, manned and equipped to do the job 1/11/2019 1:42 PM
- 154) None 1/11/2019 12:35 PM
- 155) do not agree with it at all. I am a responsible landlord. the cost will be passed onto the tenants that are probably struggling anyway. Far more expensive than areas of London. Too much money ..rogue landlords will be ignored and the ones in Coventry who live here will be paying for the absent ones and those who do not care, 1/11/2019 12:33 PM
- 156) We pay Agents a high fee for these checks and supply certificates and only on their approval they allow us to take in tenant's. The Council clearly does not follow or understand the current legislation. The Council should be fined heavily if

they proceed to simply duplicate a current legislation practice. You need to target landlords that do not follow the procedure carried out by legal letting Agents. You are penalising good landlords and the Council is not dealing with known offenders. It's called getting a grip and not getting others to do your work!
1/11/2019 11:04 AM

157) I think this is just another scheme by council to make more money and penalise private landlords. Council has already destroyed Coventry city centre by making so much students accommodation to benefit the council and big companies just to destroy smaller landlords. Then they say they would like to see entrepreneurs. Soon as someone Starts to do well. Council come out with ideas to punish those and divert profits into their own coffers. I think this selective license is nothing else but money making scheme by Coventry city council. I have seen this council waste so much tax payers money due to lack of sensible planning, one example is creat bus lanes and spent millions and got rid of them spend more millions. What nonsense. 1/11/2019 10:23 AM

158) No 1/11/2019 9:48 AM

159) I think it unreasonable that fees are not lower for second and subsequent properties owned and managed by the same landlord. I also think that where properties are managed by an accredited agent that the costs of an annual inspection by the council are unnecessary. 1/11/2019 9:05 AM

160) I use an agency for my renting out and they deal with lots of the issues contained in the survey. I may have missed the info, but can't see any reference to properties that are managed properly like that. I pay a fee to the agent, I dont think its fair to also pay for a licence. I only have one property. 1/11/2019 8:45 AM

161) This is just simply a new tax to cover up for Council propping up failing developments they keep investing in. 1/10/2019 6:31 PM

162) I do not believe this scheme is necessary or justified. This scheme relies on landlords pro-actively making themselves known to their local authority. Criminal landlords who fail to provide secure and safe accommodation to their tenants will not come forward. 1/10/2019 4:59 PM

163) Scheme needs to include other areas of Coventry eg around Gerrard Avenue, Sheriff Avenue etc 1/10/2019 4:55 PM

164) Another money making scheme by the council attacking landlords, the majority of who do a good enough job. This will drive landlords away and the bad ones further underground. By default, the council will already know the poor landlords. Why not spend resources and concentrate on going after them.
1/10/2019 4:17 PM

- 165) Whilst understanding the reasoning behind this proposal, it also places a considerable extra financial load on landlords who are frequently not making huge profits from their investments. I fear that it will cause some landlords to sell their properties and thus reduce the PRS stock, unfortunately this is likely to be the better landlords. 1/10/2019 4:07 PM
- 166) It is a total waste of time and another opportunity for the council to raise extra revenue there is no other purpose for this and by having selective licensing you will not solve anti social behaviour and the like. 1/10/2019 3:45 PM
- 167) I think it should be extended to the whole of Coventry and not just selected areas, there are private rented properties in every area of the city 1/10/2019 3:26 PM
- 168) Far too expensive for the landlord. 1/10/2019 2:22 PM
- 169) I am concerned that the costs incurred by the landlord will be passed onto the tenants. I have read the report and am extremely concerned by the levels of child poverty revealed and do not want this to be exacerbated by this which is something landlords should be doing anyway! 1/10/2019 1:50 PM
- 170) The information pack should also contain information about how to complain, as a tenant, if the license holder is not maintaining the conditions. 1/10/2019 1:07 PM
- 171) As a previous private tenant to a negligent landlord I feel I can put a lot of input into this consultation. I also sit on 2 expert panels that cover some of the issues mentioned 1/10/2019 12:59 PM
- 172) Would licensing properties only in certain areas not push problems into areas not covered? Is there adequate resources to enforce this? The numbers, and grading, of officers working to enforce this leaves a bit to be desired. 1/10/2019 12:05 PM
- 173) extra rubbish produced by incoming and leaving tenants must be disposed of timely by the landlord - and not flytipped or left for council to dispose of (eg mattresses etc) Also - tenants must conduct themselves in appropriate manner to the environment they are living in - ie anti social behaviour. Also many rentals allow tenants to park on front garden with no dropped kerb - this also needs addressing. 1/10/2019 11:14 AM
- 174) Unfortunately, if you charge me for having a licence I will have no option to put the rent up for my tenants. I am a very good landlord and do everything possible to keep my tenants happy. I deal with all issues within 24 hours. I feel as though I am being penalised for the other bad landlords in Coventry which isn't

fair. In the end it is only the tenants that will suffer due to increased rent as I have to cover my costs. 1/10/2019 10:06 AM

175) The increase in the number of poorly managed/un-managed privately rented properties has had a significant impact on the look and feel of certain areas within the city, anything that addresses this is very warmly welcomed (and overdue). I have knowledge of the rented sector & am therefore aware that profits are significantly more than a landlord's mortgage/expenses, therefore the fees proposed, by comparison, are quite modest. 1/10/2019 9:53 AM

176) I think the most useful outcome of this scheme would be if it were able to limit the apparently uncontrolled conversion of swathes of houses being converted to HMOs. (not just for students) This has an impact on neighbourhoods because of the huge increase in car numbers parked in the street (thinking of long streets of Victorian terraces) 1/10/2019 7:48 AM

177) This is a sledgehammer to crack a nut. Intelligent targeting of poor landlords through adequate data collection and then taking court action against them would be far more effective. The scheme as proposed will result in far too much effort focused on processing already compliant landlords. By introducing licence fees (however much reduced) you are effectively penalising landlords who already do a decent job. Why not work more closely with agents like Futurlets to identify problem landlords and deal with them directly. This just smacks of another cash generating scheme. 1/10/2019 12:35 AM

178) Whole streets not parts of street should be covered and support should be given to landlords who need help with unruly tenants 1/9/2019 5:34 PM

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 an information flyer (see 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. The first paragraph states: 'The Council wants to improve the quality of privately rented homes and HMOs in the private rented sector.' The second paragraph states: 'Have your say on plans for Selective Licensing of privately rented homes and Additional Licensing of Houses in Multiple Occupation (HMOs).' The third paragraph states: 'Both schemes would place tighter controls on the standards of private sector landlords and the behaviour of tenants in neighbourhoods throughout Coventry.' To the right of the text is a white silhouette of two houses with a plus sign between them, and below the houses are white silhouettes of people. At the bottom left is the Coventry City Council logo, which features a stylized tree and a horse. At the bottom right, the text 'For details visit www.Coventry.gov.uk/propertylicensing' is written in white.

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 a 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.

DRAFT

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)
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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:

- Review data in 12 months' time to check Stage 2 criteria for areas currently outside of the proposed Selective Licensing area;
- The number of prosecutions and enforcement actions taken as part of the scheme should be 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 licence requirements;
- Consider including Disclosure and Barring Service (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.

Letters /Emails Submitted in response to the consultation

(1) Public Health

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 ██████████. 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.

• 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)*
- 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 confident that NALS agents have provided advice to</i>

Example Scheme Conditions	NALS Service Standard Requirements
	<i>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 against misunderstandings, they will arrange for the</i>

Example Scheme Conditions	NALS Service Standard Requirements
	<p><i>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>

Residents 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 prevent 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 rouge 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 rouge 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.