

## Appendix 3

# Additional HMO Licensing Proposals

## Engagement and Consultation Plan



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## **1. Introduction**

### **1.1 What is the purpose of this engagement?**

Coventry City Council wishes to consult and seek the views of tenants, landlords, residents, and all other stakeholders in relation to a proposed new additional licensing scheme for Houses in Multiple Occupation (HMOs).

HMOs form a vital part of the Private Rented Sector (PRS) in Coventry, often providing cheaper accommodation for people whose housing options are limited. Some HMOs are occupied by the most vulnerable people in our society. Most HMO accommodation in Coventry was not built for multiple occupation, and therefore the risk of overcrowding and fire can be greater than with other types of accommodation. The nature of HMOs means that the regulation of this part of the sector is widely agreed to be necessary. Local Councils can introduce additional HMO licensing to improve the management and standards of HMO in their area. Coventry City Council has had a city wide Additional Licensing Scheme for HMO accommodation since 2020. This has meant that any person letting an HMO in Coventry, must have a licence. The proposed new scheme will replace the current additional HMO licensing scheme. It is proposed that the new scheme will continue to cover the whole of the city and will last five years. If, after the consultation, a new HMO licensing scheme is still found to be the best option, this recommendation will need to be approved by the Council's cabinet. If approved, we anticipate that the new scheme will commence in May 2025 when the current scheme expires.

### **1.2 What do we want to achieve?**

The overarching aim of this activity is to support the successful delivery of the statutory consultation required within the Housing Act 2004, which in turn will enable the City Council to make a decision about the introduction of additional licencing for HMOs in Coventry.

The aims of the activity are:

- To inform those likely to be affected by the decision to introduce additional licensing for HMOs.
- To capture any representations made by those impacted by the decision to introduce additional licensing for HMOs.

### **1.3 How do we plan to achieve our objectives?**

The Council proposes to carry out a 12-week consultation to obtain feedback and views on issues connected to the PRS and the proposals for discretionary licensing. Following this wide reaching, full consultation the Council will analyse all responses to the consultation and develop a final consultation results report and demonstrate how it has responded to the suggestions received. The results of the consultation will help to inform the final proposals for discretionary licensing. These final proposals will be published and formally agreed by the Council.

## **2. What can be influenced by the public and what is fixed?**

Fixed:

- The continuance of a Mandatory Licensing Scheme  
Mandatory licence conditions for additional schemes

Can be influenced by the public:

- Whether we bring in a new Additional Licensing Scheme
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- Where we bring in a new Additional Licensing Scheme
- The fees and discounts applicable to the proposed scheme
- The discretionary licence conditions for the proposed scheme

### 3. Engagement and Consultation Plan

#### 3.1 Who are we engaging with?

The following is a list of examples of the stakeholders that the Council will consult with and is not limited.

<b>General target group</b>	<b>Examples of Individuals/organisations</b>
Landlords	<ul style="list-style-type: none"> <li>• Landlords operating and/or living in Coventry</li> <li>• Housing Associations/ Registered Social Landlords</li> </ul>
Landlord groups	<ul style="list-style-type: none"> <li>• National Residential Landlords association</li> <li>• Coventry Landlord Accreditation Scheme</li> <li>• Guild of Residential Landlords</li> <li>• BLA (British Landlords Association)</li> </ul>
Managing and letting agents	<ul style="list-style-type: none"> <li>• Managing and letting agents with local branches operating in Coventry</li> </ul>
Residents	<ul style="list-style-type: none"> <li>• Tenants who have privately rented within the last 5 years</li> <li>• Residents who have indirect experience of the private rented sector (i.e. neighbours of PRS properties)</li> <li>• Other organisations that represent tenants in the PRS</li> <li>• Coventry business owners</li> <li>• Coventry owner/occupiers</li> </ul>
Organisations that represent tenants in the PRS	<ul style="list-style-type: none"> <li>• Generation Rent</li> <li>• Acorn Union</li> <li>• The Tenants Voice</li> <li>• Belgrave Road &amp; Neighborhood Watch Association</li> <li>• Cannon Park Residents Association</li> <li>• Bell Green Area Tenants and Residents Association</li> <li>• Chapelfields Area Residents and Traders Association (CARTA)</li> <li>• Charterhouse Resident's Association</li> <li>• Cheylesmore Good Neighbours</li> <li>• Clifford Bridge Community Association</li> <li>• Deedmore Residents Association</li> <li>• Gosford Park Residents Association</li> </ul>

	<ul style="list-style-type: none"> <li>• Manor Farm Residents Association</li> <li>• Paradise Community Action Group (PCAG)</li> <li>• Princess Street Residents' Association</li> <li>• Singer Residents Group</li> <li>• St. Catherine's Resident's Association</li> <li>• Stoke Aldermoor Resident's Association</li> <li>• Stoke Heath Resident's Association</li> <li>• Styvechale Grange Resident's Association</li> <li>• Tile Hill South Resident's Association</li> <li>• Tile Hill Village Residents Group</li> <li>• Upper Stoke Resident's Association</li> <li>• Websdale Tenant's and Resident's Association</li> <li>• Wood End Residents and Friends (WERAF)</li> <li>• Wood End, Henley Green and Manor Farm (WEHM)</li> <li>• Frontline Network</li> </ul>
Professional bodies	<ul style="list-style-type: none"> <li>• Chartered Institute of Housing</li> <li>• Chartered Institute of Environmental Health</li> <li>• RICS</li> </ul>
Universities	<ul style="list-style-type: none"> <li>• Coventry University</li> <li>• Warwick University</li> <li>• Arden University</li> <li>• Coventry Students' Union</li> <li>• Warwick Students' Union</li> </ul>
Neighbouring local authorities	<ul style="list-style-type: none"> <li>• Nuneaton and Bedworth Borough Council</li> <li>• Warwickshire County Council</li> <li>• Warwick District Council</li> <li>• Rugby Borough Council</li> <li>• Solihull Borough Council</li> <li>• North Warwickshire Borough Council</li> </ul>
Charities	<ul style="list-style-type: none"> <li>• CW Mind</li> <li>• Shelter</li> <li>• Crisis</li> <li>• The Tenants Voice</li> <li>• Citizens Advice</li> <li>• City YMCA</li> <li>• Cyrenians</li> <li>• Steps For Change</li> <li>• P3</li> <li>• Salvation Army</li> <li>• Emmaus</li> <li>• Bardsley Youth Project</li> <li>• Valley House</li> </ul>

Advice groups	<ul style="list-style-type: none"> <li>• Citizens Advice Bureau</li> <li>• Generation Rent</li> <li>• Coventry Law Centre</li> <li>• Coventry Independent Advice Service</li> <li>• Age UK Coventry and Warwickshire</li> <li>• Macmillan Coventry and Warwickshire</li> <li>• Myton Hospices</li> <li>• Coventry Refugee and Migrant Centre</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Coventry and Warwickshire Partnership NHS trust</li> <li>• Coventry University Hospital</li> <li>• GPs (websites)</li> <li>• NHS local clinical Commissioning groups</li> <li>• Social Services</li> </ul>
Emergency Services	<ul style="list-style-type: none"> <li>• Coventry Police</li> <li>• Coventry Fire Service</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Coventry Foodbanks</li> <li>• Coventry and District Credit Union</li> <li>• Trading Standards</li> <li>• Suppliers of temporary accommodation</li> <li>• Coventry Schools</li> <li>• MPs, Local Cllrs</li> <li>• Mayor of West Midlands</li> </ul>

### 3.2 When and how are we engaging?

The minimum consultation period for the Additional Licensing proposals required by the MHCLG is 10 weeks. In order to reach as many consultees as possible, it has been decided that this consultation will be extended to 12 weeks, commencing 26<sup>th</sup> February 2024 concluding 17<sup>th</sup> May 2024. The extended consultation timeline has been given to ensure engagement with a wide range of stakeholders. To support this and making use of the additional time, a number of different engagement activities have been planned for the licensing proposals.

#### Online consultation questionnaire

The primary way in which people will be able to provide their feedback on the scheme and give details of their experiences will be via a dedicated HMO Licensing Consultation page on the Council's online platform "Let's Talk" which will contain an online survey. This is to ensure as much as possible that the responses received are focused on the questions that we need answered and to facilitate the collation, comparison and tracking of responses.

The questionnaire will be relevant for all interested parties as it will ask targeted questions dependant on who you are i.e. whether you are a tenant, landlord or managing agent etc. The questionnaire will be hosted on a dedicated and easily accessible page on the Council's website that will provide the respondent with all the information necessary about the proposal to allow them to make an informed response. The on-line questionnaire will be accessible via all digital platforms – mobile, tablet, laptop/computer. Residents without digital access will be able to request a paper copy or can be supported to complete the questionnaire digitally at one of our engagement sessions or during an appointment with an officer.

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## **Meetings/workshops/forums/engagement sessions**

During the course of the consultation, we will be running a number of events to encourage engagement with stakeholders. We will be attending multiple Landlord Forums and Homeless Forums to inform them about the consultation and engage in Q & A sessions. Attendees will be invited to our consultation workshops and/or encouraged to fill out our online consultation questionnaire on the tablets we will have available at the sessions.

We will be holding a total of six workshops, three for landlords and agents and three for residents. These workshops will allow each group the opportunity for an in-depth interactive session to discuss their thoughts on our proposals and their experiences regarding the condition of the PRS in Coventry and its effect on deprivation, crime and anti-social behaviour.

### **In writing/email**

Contact details will also be advertised as part of the consultation so that representations can also be made via e-mail or in writing. There will be a dedicated email address for responses.

The consultation will take note of any formal petitions and will also take note of any activity on social media, although this will not equate to a formal representation.

### **3.3 What are the questions we will ask?**

The example questions used here are samples taken from our proposed online consultation questionnaire and should not be considered exhaustive. There will be an extensive pack with all of the background information to allow respondents to understand what they are being asked and give a considered response.

1. Whether the stakeholder has direct experience of anti-social behaviour, deprivation or poor housing conditions in the private rented sector.
  2. To what extent do you agree or disagree that the current Additional Licensing Scheme has been effective in improving the quality and management of HMO properties in Coventry?
  3. If the current Additional Licensing Scheme stopped and was NOT continued, what impact do you think this would have on your local area?
  4. If they agree with the Council's proposal to introduce a renewed Additional Licensing Scheme.
  5. To what extent do they agree or disagree with the principles of the scheme and the wards that we have proposed to include?
  6. If they think the fees, discounts and structure is reasonable?
  7. To what extent do you agree or disagree with the proposed Additional Licensing conditions?
  8. If they are a landlord, whether they would be interested in signing up to the Coventry Landlords Accreditation Scheme (CLAS) and whether the proposed discount on licensing fees would be an incentive.
  9. If they are a tenant in the PRS whether they would be more likely to move into a property with a landlord or managing agent who has signed up to the CLAS than one without.
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10. A final open-ended question inviting respondents to raise any further points they wished to make in relation to the proposed licence fees, conditions, and anything else the Council should consider; and to provide further comments about any other aspect of the proposals.
11. There will be an optional set of questions asking people for information about their age, sexual orientation, ethnicity and age etc. This will help us ensure that we are gathering views from all communities.

### **3.4 How will we promote the engagement opportunity?**

The Council will conduct necessary communications activity to promote the consultation and ensure that a true reflection of the views of the affected groups in relation to this consultation is achieved. The key to successful consultation is to ensure that stakeholders who could be affected are informed and aware of the proposals and understand how they can provide feedback. Communications will take place throughout the duration of the consultation and will include:

- Advertising on electronic media such as Coventry City Council website
- An eform linked to the main consultation webpage
- Advertising on social media such as Twitter, Instagram, Facebook
- Straplines linked to the main consultation page to be added to all officer email signatures
- Posters/Advertising on buses and bus shelters
- Direct emailing of landlords and managing/letting agents or properties licensed within the last 5 years
- Online engagement sessions with managing/letting agents
- Direct mail and email to local communities
- Press releases in local publications such as Coventry Telegraph , Coventry Observer, Earlsdon Echo
- Posters referring people to the consultation
- Flyers to be sent to addresses that are indicated by Council data as occupied by residents with a profile that matched those in the PRS
- Flyers to be included in correspondence to tenants and landlords.
- Flyers for students to be distributed at local higher education establishments
- Community meetings and events in Coventry, including Landlord Forum, street/area consultation events and focus groups for the representatives of some minority groups
- Online meetings with representatives of charities such as Shelter, Crisis, etc.
- Emails to a wide range of national, regional and local stakeholders
- A dedicated email address for responses
- PowerPoint presentations for events.
- Direct emailing of landlords who are members of the Landlord Forum
- Direct emailing to Landlord Forums or other professional landlord groups.
- Direct emailing of accreditation schemes.
- Direct emailing of Resident Associations.
- Officers interviewing tenants and landlords/managing agents whilst on inspections
- Direct contact with landlords and managing agents and bodies representing landlords and agents
- Invitation of various stakeholders to online workshops
- Presentations at online forums
- Advertised internally on staff intranet
- Direct email to the equivalent team in neighbouring local authorities

### **3.5 What is our plan for letting people know the outcome of the consultation?**

Throughout the consultation process a record of each consultation event or period that has been undertaken and the feedback obtained will be formally logged. The record will detail the date of the

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consultation, what form of consultation took place, who was consulted and what feedback was given. Once the consultation has concluded and all responses are in, all feedback will be analysed and summarised in the consultation report.

Coventry City Council are committed to ensuring all comments received are recorded and there is a clear audit trail of all decisions made and how consultation responses were taken into consideration and balanced with any evidence and specific information gathered. The consultation report will be published and placed on the website. The outcomes of the consultation and response to the consultation, plus any recommendations for the Additional Licensing Scheme will be made to the Council's Cabinet.

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#### 4. Activity plan

WHAT	WHO	PURPOSE	WHERE	WHEN
Ward drop-in sessions		Q&A sessions on the proposed Additional HMO Licensing Scheme	One in every Ward within the City	The sessions will begin on Tuesday 27 <sup>th</sup> February and will be held on Tuesdays and Thursdays in the different Wards thereafter.
Landlords Forum	80+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	2024 February/March
Homeless Forum	40+	Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	TBC
Landlords Workshop	10+	Discussion workshop to understand private sector landlords' opinions on the proposals with brief Q&A session.	Online	February/March/ April
Tenants Workshop	10+	Discussion workshop to understand private sector tenants' opinions on the proposals with brief Q&A session.	Online	February/March/ April
Attend Community Council Meetings		Introduce the plan to hold a consultation and ask for volunteers to attend our licensing consultation workshops.	Online	TBC
News Story for press	General public	Fly on wall bad landlord case study with lead into licensing consultation.	Coventry Telegraph, Coventry Observer, Local BBC News	First week of consultation
Adverts in press	General public	Advertise licensing consultation.	Coventry Telegraph, Coventry Observer	Week one of consultation and week 6 of consultation
Landlords Bulletin	300+	Advertise licensing consultation.	Mail list	February/March

Coventry Landlord accreditation scheme newsletter	All member of the CLAS	Advertise licensing consultation.	Members list	TBC
Strap lines on emails	General public	Advertise licensing consultation.	Housing enforcement and Environmental Health Officers (19 officers) Housing Options/tenancy relations teams	Duration of consultation
Social media campaign	General public	Advertise licensing consultation.	Facebook, Twitter, Instagram, Yammer	Once a week for the duration of consultation
Advertising on electronic media	General public	Advertise licensing consultation.	Coventry City Council website	Duration of consultation
Email/Mail shot to stakeholders	Mailing list	Advertise licensing consultation.	TBC, Homeless forum	March
Email invitations	Mailing list	Invite landlords, tenants and agents to our discussion workshops on our licensing proposals.	Email	February/March
Posters	General public	Advertise licensing consultation.	To be displayed in public places	Duration of consultation
Digital marketing boards	General public	Advertise licensing consultation.	Busy pedestrian areas (Friargate, Customer Service Centre)	Duration of consultation
Banners	General public	Advertise licensing consultation.	Railings outside public owned buildings and outdoor spaces e.g. parks	Duration of consultation
Flyers	General public	Advertise licensing consultation.	Posted in targeted areas	Duration of consultation
Information bulletin	General public	To advertise the consultation and offer the public the chance to approach us informally and ask questions they have regarding the scheme.	TBC	Multiple events throughout the consultation

## 5. Contact information

Stakeholders are able to contact officers if they would like to know more about the engagement plan or activities via the details below:

HMO licensing

Address: PO Box 15

Council House

Earl Street

Coventry

CV1 5RR

Telephone: 024 7697 5467

Email: [hmo@coventry.gov.uk](mailto:hmo@coventry.gov.uk)

Web: <https://www.coventry.gov.uk/housing-enforcement/hmo-licensing>

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