

APPENDIX 10: Response / Comment Tracker for Selective Licensing

Date received	Comments	Action / Response (if necessary)	Date response sent
23/10/15	<p>Dear Adrian,</p> <p>Speaking personally I am fully supportive of the proposals.</p> <p>My only other comment would be subject to administration considerations why stop at the selected areas. Unscrupulous landlords can exist anywhere. Much of the recently publicised exploitation has even been in rural areas. That said if administrative resources are limited it make sense to limit the scheme to the most likely and most dense area of private rented sector.</p> <p>Kindest regards</p> <p>PS these are personal views, I have circulated your letter to Parish councillors and if the Parish Council forms any views I will relay those to you</p>	<p>PCC recognises that unscrupulous landlords can and do operate across the city. However, DCLG guidance prevents a blanket city-wide approach being taken and requires us to identify those areas where we think the need is greatest.</p>	19/11/15
23/10/15	<p>Sorry, but the Dogsthorpe Ward should be included in the "Selective Licensing" area.</p> <p>We are a densely populated area, with many social issues...with many recognised social landlords and many individuals renting properties out to one or more tenants....some of the properties are of poor exterior and interior condition.</p> <p>So my contribution to the debate is...</p>	<p>Dear</p> <p>Under the Housing Act 2004 the first threshold that must be applied before an area can be considered for Selective Licensing is that more than 19% of the housing stock must be in the private rented sector. The average for Dogsthorpe is just over 11% and therefore it cannot be considered.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15

	<p>"Please include the Dogsthorpe Ward, do not exclude Dogsthorpe Ward".</p> <p>Still do not understand why this area of the city has not been included?</p> <p>Best wishes</p>		
26/10/15	<p>Against the principle of just licensing certain areas, should be all areas or NONE at all.</p> <p>If current laws ENFORCED no need for additional ones!</p> <p>Good landlords shouldn't be penalised by paying fees. This will inevitably increase rents which are already very high in relation to earnings.</p> <p>One way of reducing problem would be for council to employ workers to VISIT and CHECK all accommodation that receives HOUSING BENEFIT. No housing benefit should be paid for tenants living in substandard properties.</p> <p>Better computer systems that can easily check how many tenants on housing benefit live at same property. There will always be rogue landlords and council should just focus on these. It's not difficult to see which houses are substandard just by walking down the roads!!!!!!</p> <p>PCC should spend their time and effort on concentrating on these landlords and closing properties down if landlord does not improve situation. However what are the consequences of this as PCC is short of housing and can't offer any alternatives at present. Do they turn a blind eye because of this? Bringing out licensing will highlight problem but not address it, just cause more ineffective legislation, control and power to an already overstretched council with ever diminishing resources. It may pay for the running of the system but not address the problem.</p>	<p>In their 2014 guidance note "Review of Property Conditions in the Private Sector", DCLG states that, "The Government does not support the use of licensing across an entire local authority area". It adds, "Such an approach is disproportionate and unfairly penalises good landlords". Any Licensing scheme should therefore be, as the name suggests, selective. It should identify those areas where there is greatest need using the six criteria listed in the changes to the 2004 Housing act in April 2015. These are: Crime, deprivation, anti-social behaviour, poor housing conditions, migration, and low housing demand.</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents. The fee has been modelled to allow the council to administer the scheme effectively and to increase its investigative powers both for back office and "boots on the ground").</p> <p>Unscrupulous landlords will not, in most cases, accept housing benefit tenants as this creates a paper trail by which they can be identified for tax purposes. The Council works with a number of partners to identify privately rented, substandard accommodation and the scheme is designed to enable officers</p>	19/11/15

		to focus resources on these landlords and properties, whilst adopting a light touch approach to professional landlords.	
26/10/15	<p>Dear Sir,</p> <p>My house is located at xxxx. I am not sure if it falls in the proposed area of the selective licensing or adjacent to it.</p> <p>I do not understand the map properly.</p> <p>Please can you let me know the category I fall in.</p> <p>Thank you very much</p>	<p>Dear</p> <p>Thank you for your email.</p> <p>I can confirm that properties 2-23, 24-72 (evens only) fall within the designated proposed area for Selective Licensing.</p> <p>We have since uploaded a list of all street names onto the website for ease of reference.</p> <p>Thank you once again Sent on behalf of Selective Licensing Project Team</p>	19/11/15 Returned as undeliverable to email address
26/10/15	<p>Afternoon,</p> <p>Just had the letter about Selective Licensing. I believe it's a positive thing.</p> <p>I'm just after clarification tho that tenants wouldn't be put at risk of losing their rented properties by all of this would they? I rent a flat and our landlord is brilliant but with some landlords potentially against this, all I'm saying is would this have an impact on people losing their homes? Or would you guys jump in and manage these properties?</p> <p>Just after clarification,</p> <p>Thanks</p>	<p>Dear</p> <p>PCC does not believe this will increase the likelihood of tenants losing their property. In fact we believe that through SL the proportion of tenants with proper tenancy agreements will increase and this should reduce the chance of people being unfairly or illegally evicted.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
26/10/15	To whom it may concern	Contact added to the database requesting questionnaire and sent out direct	28.10.15

	can you please send a copy of a selective licensing letter and consultation questionnaire to the following address thank you.		
26/10/15	<p>The concept of selective licensing, whilst it sounds great on paper, will inevitably lead to an increase in rent for tenants and further evasion of accountability on the part of existing rogue landlords.</p> <p>Nine times out of ten the dilapidated properties are owned by landlords that live abroad or live outside the area whom have passed on their duties to unethical independent agencies.... Primarily along the Lincoln road area.</p> <p>It's best to address the issue directly and put the funds into individual investigation of complaints raised on an ad hoc basis. This will deter people from potentially investing in the area, as this will be an unwelcome hassle and expense for reputable landlords such as myself. This, to reiterate will most unlikely affect rogue landlords..... It will take more than an additional tax to prevent them from treating private and housing benefit tenants the way they do....it would be more effective to petition for a review of statutory law to address breaches of housing legislation, ensuring that breaches are punishable with sentencing through the magistrates court as opposed to fines. Rogue landlords ironically have more liquid assets and are likely to pay the fine and carry on as normal. Hiding behind the name of an agent, family member or friends. Rogue Landlords should be fearful that they will be pursued to the full extent of the law As opposed to fines and additional costs which inevitably are passed on to tenants anyway.</p> <p>I keep my ears to the ground and hear some scandalous tales of goings on in the local area and have even overheard a rogue landlord scoffing at the idea which leads me to believe that this</p>	<p>Dear</p> <p>The licence fee has been calculated to allow for an increase in the powers of investigation, both in terms of data analysis and physical inspection. SL allows the council to bring disparate pieces of legislation, ranging from Health & Safety to Housing, into one place and allows easier enforcement.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15

	<p>will be far from an effective approach to dealing with the issue..... If you would like to hear more or speak with me regarding this you are welcome to contact me via email, I feel I can offer insight into the situation from a landlords point of view but also as a conscientious individual that cares about the area, and knows intimate details about those who don't</p>		
26/10/15	<p>Hi,</p> <p>Many thanks for the email, would it be possible to arrange a meeting with Adrian to discuss the selective licensing proposal</p> <p>Many thanks</p>	Currently in liaison direct to set up briefing session	
27/10/15	<p>I have tried to contact you by telephone but been unable to get through as I have various questions concerning the proposed Selective Licencing but the most important is to find out if my property is covered by the proposal. It appears to be within the indicated areas but I note that not all properties are included. The relevant address is xxxx. If it is not included then the following questions are irrelevant so please ignore then.</p> <p>Secondly, I am an absentee landlord and spend most of my time abroad so have managing agents to look after the property, arrange lettings and deal with tenants. I visit every year or two to check up on the flat and make any improvements necessary. Do I need a licence and make the various proposed checks and record keeping personally or can I leave it to my estate agents? Will they have to have some kind of licence from you?</p>	<p>Dear Mr,</p> <p>Numbers are included so yes it is inside the proposed area. As you are inside the proposed areas you will need a licence if the scheme is implemented.</p> <p>The licence holder should be the person for whom it is most appropriate to hold the licence. In the situation where you live abroad and have no day to day control over the running of your property then it could be that your agent is the most appropriate person.</p> <p>The licence application consists of 3 sections the applicant, the licence holder and the manager. All 3 could be the same person but equally it could be 3 different persons depending on the individual circumstances relating to the property.</p> <p>However, if your managing agents are registered with ARLA (Association of Residential letting Agents) then you will pay only £50 per property over the whole five year period that the scheme is intended to run for.</p>	19/11/15

	<p>I have many more questions concerning the detail of the proposal but will leave these until I have your answers to the above.</p> <p>As a further comment I know that quite a few flat owners of the Forli Place blocks are not local and let the apartments like I do. I am considering the burden of all these proposals, as I suspect other owners will be, and whether to continue to let if they are made law. Certainly the cost, not just of the licence but of all the other requirements will probably mean an increase in the rent I shall ask as it is inevitable my estate agent will increase charges.</p> <p>I await your reply, I hope before the first public exhibition next week as I shall be leaving for home the following day.</p> <p>Regards,</p>	<p>Equally, if you as a landlord gain accreditation with either the National Landlords Association or the Residential Landlords' Association you are liable for a £50 licence fee per property over the five year period.</p> <p>If the agents are not ARLA registered and you are not NLA or RLA accredited, or you are you will be liable for a £600 licence fee.</p> <p>This pricing is specifically intended to encourage landlords to be aware of their obligations.</p> <p>Selective Licensing imposes no additional obligations on landlords. It merely brings various existing but disparate pieces of legislation together so that the local council can more easily enforce them. For responsible landlords the only additional expense is the £50</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
27/10/15	<p>Hi, £600 for single let property is annualy or for 5 years, please? Thank you,</p>	<p>Dear Mr, The fee for a single let property is for the whole five years, not annually. A licence runs for up to 5 years so if a landlord decides to let a property at any time during the five years the same fee applies.</p> <p>The fee covers the costs of administering the licence and inspecting the property during the term of the scheme, these costs are static so the fee structure is static.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
27/10/15	<p>Hello</p>	<p>Dear,</p>	19/11/15

	I have been trying to establish if my road/address is on the proposed list - I live at xxxx, it was not on the street name list but appeared to be in the red area on the map. Please clarify. Regards	Yes, your street is included. It is missed off the street list as it's classified as a subsidiary street. However, we have now updated our information to include these types of streets. Sent on behalf of Selective Licensing Project Team	
27/10/15	I am NOT a landlord or tenant but this proposal is discriminatory to both landlord and tenant. If one landlord should be licensed then all should be, if one tenant has this extra protection, then they all should have it. The council should be enforcing the powers they already have across the whole city.	Dear xxxx, SL's purpose is to bring together the disparate branches of legislation – some of which the city council are not able to pursue, like gas safety – and allow them to enforce far more easily than we can at present. Government guidance prevents us from licensing all landlords. We need to select those areas that are most in need of extra control. Sent on behalf of Selective Licensing Project Team	19/11/15
27/10/15	I have tried to answer your questionnaire but I can't find it on the website.	Dear Mrs xxxx, Please go to https://www.peterborough.gov.uk/residents/housing/selective-licensing/public-consultation/ and click on the link to "complete an online questionnaire" Sent on behalf of Selective Licensing Project Team	19/11/15
27/10/15	Can you please tell me if Vintners Close PE3 6BT falls into the proposed licensing areas? Many thanks,	Dear, Vintner's Close does <u>not</u> fall within one of the areas proposed for SL at this stage but you are an important consultee as you live in an area adjacent to one of the core areas. Sent on behalf of Selective Licensing Project Team	19/11/15
27/10/15	Dear contact, can you confirm whether the Sugar Way development is to be included in the selective licensing initiative?	Dear,	19/11/15

	Kind regards	<p>Parts of the Sugar Way estate fall within the proposed areas, but not all. Please see the map online at: https://www.peterborough.gov.uk/upload/www.peterborough.gov.uk/residents/housing/SelectiveLicensingConsultation-MapOfProposedAreas-October2015.pdf</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
28/10/15	<p>Who on earth came up with this mad scheme? What gives you the right to arbitrarily decide to label decent people in with the bad apples in Peterborough. Who picked out these areas and how many city councillors actually live in the red areas? And please don't reply "It's not arbitrary we are having a public consultation" No matter what happens with any council consultation is a farce, you will just do whatever you want anyway. Are the public going to have any sway about the divvying up of Peterborough in good and bad areas? Who decided that? These are among the many questions you will be asked at the public meetings. You will only end up creating a downward spiral of house prices in the red areas as people will use it to drive prices down in the red and even the green which will lead to areas going downhill as landlords will take advantage and let them out cheaper and cheaper in those areas leading to less caring tenants which you are trying to avoid, but will create. Everybody in Peterborough knows that a lot of the problems you are pointing out occur in the Ortons and Paston, yet they are not red or green? Did you check with the police crime figures before these lines were drawn? There surely has to be a human rights issue somewhere in this, you are about to divide the city up according to some amazing and stupid premises. I want to know who it was that came up with these decisions it surely must be the result of one man's insanity, not everybody in the council can be insane? I and my</p>	<p>Dear,</p> <p>We would encourage you to attend one of the public meetings to discuss the scheme. There is a great deal of evidence to support the scheme's introduction, to deal with housing that is sub-standard. In contrast to your comments, we believe that SL is the best way to enhance the areas proposed. Without action, the current poor quality of housing, anti-social behaviour and deprivation will cause increasingly acute problems.</p> <p>Please visit the website where you'll find detailed supporting documentation.</p> <p>We are of course in close contact with the relevant city councillors ourselves.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15

	<p>neighbours will have much more than this to say about this at the public meetings (if we are ALLOWED TO SPEAK THAT IS). And no is the answer to your unspoken question, I am not a landlord and don't live in a red area, but a green one. But in the meantime I will conducting my own survey of city councillors to see who supports this.</p>		
28/10/15	<p>Hi</p> <p>As our map is not interactive I cannot find out which area I am in. I live in Muskham which I think is red but it is really not clear. Can you confirm and I suggest you change your on-line map so that it can be expanded to see street names otherwise you are going to get guessing on the part of people not familiar with the wards</p>	<p>Dear,</p> <p>The website does include a list of street names and numbers. Muskham is not within one of the core proposed areas, but is in an adjacent area for consultation purposes.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
28/10/15	<p>After consultations with my family, our family's comments on selective licensing are attached.</p> <p>We agreed that your policy remains flawed, since there the exclusion of Ravensthorpe Ward is illogical. We feel that the information you have is out-dated or too old, since Ravensthorpe has a lot of private tenancies and do not understand how or why our ward and, say, North Bretton have not been included. We have friends and community contacts there and your conclusions are not supported by them.</p> <p>Similarly, we have friends and family in Paston and Dogsthorpe and your conclusions there are not supported by our contacts and information either.</p>	<p>Dear,</p> <p>Many thanks for your feedback, which is appreciated.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p>	19/11/15

	<p>Your questionnaire is designed to support the direction of travel the Council has previously been advocating and is not only enough but can be said to be selecting areas where Asian landlords are thought to predominate. Your previous EIA was unconvincing</p> <p>We support licensing of landlords but your current views are inadequate and a regurgitation of the previous policy that was rejected. It will be seen by BME people and communities as unequal. May be even racist.</p> <p>It seems a nonsense to exclude much of North Ward bearing in mind what the 2 word councillors have said on many occasions - that the character of the, ward has been changed out of all recognition</p> <p>We do not understand why the Council is so reluctant to implement a city-wide policy; indeed, it would make sense to implement a pilot in one of the wards such as Ravensthorpe, Paston, Dogsthorpe and learn lessons, as well as a ward such as East, Central or Park.</p> <p>Regurgitating old, tired and frankly seemingly divisive policies is no way forward. Your "new and revised" policies will not help in making all landlords having a consistent, fair and equitable approach.</p> <p>We feel a Council-wide policy is best, once more a pilot has been tried and tested as we propose.</p> <p>Your sincerely</p>	<p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none"> Poor property condition Inward migration Crime Anti-social behaviour Deprivation Low housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only. It cannot be said that we are targeting Asian landlords and we are committed to an impartial consultation.</p> <p>The need to address criminal landlords and anti-social behaviour is clear.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
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28/10/15	<p>Dear Sir/Madam,</p> <p>I am a responsible landlord with a property in Farriers Court, Orton Longueville. Please could you advise me if my property falls within your proposed core area for your proposed selective licensing scheme.</p> <p>Many thanks,</p>	<p>Dear,</p> <p>Farriers Court is not included in the core areas but it is in an area adjacent to a core area for consultation purposes.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
28/10/15	<p>Hi</p> <p>Please call customer back.</p> <p>Re letter sent to address from selective licencing.</p> <p>Customer is 75 years old and is an ex-employee of PCC.</p>	<p>Called 3.45pm 9/11 and left answerphone message</p>	9/11/15
28/10/15	<p>--- The following addresses had delivery problems ---</p>	<p>Alternative email address has been updated and sent out too</p>	28/10/15
29/10/15	<p>Customer requires a paper copy of the selective Licencing letter and a consultation questionnaire. He has no access to a computer.</p> <p>Please can you arrange for this to be sent.</p>	<p>This was added to the spreadsheet requesting a questionnaire. No response is felt nec.</p>	29.10.15
29/10/15	<p>Afternoon,</p> <p>Just had the letter about Selective Licensing. I believe its a positive thing.</p> <p>I'm just after clarification tho that tenants wouldn't be put at risk of losing their rented properties by all of this would they? I</p>	<p>Dear,</p> <p>We feel that tenants are actually less likely to lose their properties as SL will encourage the use of formal.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	

	<p>rent a flat and our landlord is brilliant but with some landlords potentially against this, all I'm saying is would this have an impact on people losing their homes? Or would you guys jump in and manage these properties?</p> <p>Just after clarification,</p>		
30/10/15	<p>Dear Sir</p> <p>We are Charity and Religious organisation. Do we still need the Selective Licensing</p> <p>Kind regards</p>	<p>Dear Mr,</p> <p>Charity and Religious organisations are not exempt from Selective Licensing.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
30/10/15	<p>Good morning.</p> <p>I have received the consultation form as requested. It is not clear enough on the map whether my property is in the red or green area. Can you confirm please into which area, Francis Gardens falls.</p> <p>Thank you.</p>	<p>Dear,</p> <p>There is information on the PCC website which elaborates on which areas the Selective Licensing scheme would affect. There is a link attached below</p> <p><u>Proposed areas - Selective licensing of privately rented properties</u></p> <p>From this information I can say that Francis Gardens is not listed as one of the streets that will be affected; however we value your feedback all the same.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15

02/11/15	<p>I was relieved to find that I live in Green area, not in Red area. Your selection gives me an impression that you are labelling the Red areas as deprived and unsafe areas, not nice places to live in or buy a house.</p> <p>Your intention might be to improve the area, but It will prejudice the public opinion and can affect house price. You are going to deputise the landlords to control their tenants behaviour and charge the landlords large amount of fees for their work rather than paying to them. It seems very unfair.</p> <p>.</p> <p>Yours faithfully</p>	<p>Dear,</p> <p>Selective Licensing focuses on those areas that already show signs of problems related to poor quality housing, crime, anti-social behaviour and deprivation. Without action these issues will do far more to damage an area than Selective Licensing, which is designed to address these problems, and so raise the quality of the housing and improve the community.</p> <p>If tenants do need control, then a well-informed landlord operating within a formal tenancy agreement is better able to take the necessary action. If a landlord is a member of an recognised organisation it does not impose “ a large amount of fees”</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
02/11/15	<p>I have received a letter regarding selective licensing. Does it apply to an owner of a house with a lodger in a spare room?</p> <p>thank you</p>	<p>Dear,</p> <p>No, if a landlord lives in the house Selective Licensing does not apply.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
02/11/15	<p>RE: Selective Licensing</p> <p>After consultations with my family, friends and neighbours I write to raise our concerns on the proposed selective licensing.</p> <p>As a Ravensthorpe resident surrounded by private tenants we do not understand why Ravensthorpe has been excluded amongst other areas within Peterborough?</p> <p>We strongly support licensing of landlords but your current views are inadequate and a regurgitation of the previous policy that was rejected.</p>	<p>Dear Mr,</p> <p>Many thanks for your feedback, which is appreciated.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing</p>	

	<p>We also believe you are targeting mainly landlords from ethnic backgrounds which could be seen as racist.</p> <p>I do not understand why this Council is so reluctant to implement a city-wide policy; indeed, it would make sense to implement a pilot in a few key areas around Peterborough firstly.</p> <p>Regurgitating tired, old and frankly seemingly divisive policies is no way forward. Your "new and revised" policies will not help in making all landlords having a consistent, fair and equitable approach.</p> <p>I urge you to reconsider a city-wide policy!</p>	<p>Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are: Poor property condition Inward migration Crime Anti-social behaviour Deprivation Low housing demand</p> <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were below the Peterborough average in at least five of these six criteria. The areas were selected on the data only. It cannot be said that we are targeting Asian landlords and we are committed to an impartial consultation.</p> <p>The need to address criminal landlords and anti-social behaviour is clear.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
02/11/15	<p>Did not receive any consultation letter/paper work, he would like to be sent a copy.</p>	<p>Consultation letter and questionnaire sent to xxxx from Athene on 11/11/15.</p>	11/11/15
03/11/15	<p>I have filled in questionnaire, it's seems like I am controticting myself so I would like to add that i agree to disagree the license for landlord as I think it's wrong to select certain areas it should be on landlord and properties in Peterborough as a whole as I have been in my property for 4yrs and previous 11yrs and it would be wrong if my landlord had to pay a fee when the property is highly maintained by myself and landlord and she would be penalised just because of area . Selective licensing should be on property only and not where you live as</p>	<p>Dear,</p> <p>In their 2014 guidance note "Review of Property Conditions in the Private Sector", DCLG states that, " The Government does not support the use of licensing across an entire local authority area". It adds, "Such an approach is disproportionate and unfairly penalises good landlords". Any Licensing scheme should therefore be, as the name suggests, selective. It should identify those areas where there is greatest using the six criteria listed in the changes to the 2004 Housing</p>	19/11/15

	<p>I use to live in gunthorpe which is not on your area for selective licensing to which I had neighbours who never cared of property or private landlords but because of postcode its classed as good area you do need to reconsider this licensing as being selective.</p>	<p>act in April 2015. These are: Crime, deprivation, anti-social behaviour, poor housing conditions, migration, and low housing demand.</p> <p>If your landlord is a member of an accredited organisation (like NLA or RLA) the fee will only be £50 over the whole five years that the scheme is intended to run for.</p> <p>Some areas have not been chosen because they do not have the minimum threshold of 19% of their housing stock in the private rented sector.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
03/11/15	<p>Good afternoon</p> <p>I wonder if you could kindly let me know whether Minster Precincts is likely to be included in your potential scheme for selective licensing. We would also appreciate some details about the potential cost of each licence, as this will be a very serious concern for us if we are to be included.</p> <p>Kind regards,</p>	<p>Dear,</p> <p>There is information on the PCC website that details which areas and streets are to be included. A link is attached below for your reference.</p> <p><u>Selective licensing of privately rented properties - Housing</u></p> <p>From the information on this site I can tell you that Minister precincts is included among the streets that will be affected. However only numbers xxxxxxxx.</p> <p>There should be no cost to tenants living in privately rented accommodation. The cost will vary depending on whether you are the landlord and whether you use agents to manage your property as it is always Landlords that need to gain a licence, not agents.</p> <p>However, if your managing agents are registered with ARLA (Association of Residential letting Agents) then you will pay only £50 per property over the whole five year period that the scheme is intended to run for.</p>	19/11/15

		<p>Equally, if you as a landlord gain accreditation with either the National Landlords Association or the Residential Landlords' Association (RLA) you are liable for a £50 licence fee per property over the five year period.</p> <p>If the agents are not ARLA registered and you are not NLA or RLA accredited, you will be liable for a £600 licence fee. This pricing is specifically intended to encourage landlords to be aware of their obligations.</p> <p>Selective Licensing imposes no additional obligations on landlords. It merely brings various existing but disparate pieces of legislation together so that the local council can more easily enforce them. For responsible landlords the only additional expense is the £50</p> <p>I hope this information is helpful and please refer to website for any further information you may need.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
05/11/15	<p>Good morning</p> <p>My name is. I am full time employee in a factory since 2003. I have some properties on rent in Peterborough. I heard about to get licence from council , I am not educated and can not use computer very much. I have my accountant and i am paying my income tax regularly. as i told you that i am working full time. I need help from you how to get the application form and how to fill it please make appointment for me with somebody who can help me about this matter</p> <p>hope you will help me</p> <p>many thanks</p>	<p>Dear,</p> <p>The proposed Selective Licensing scheme is not yet active so there is no need to apply for a license as yet. We are in a public consultation period to gauge how the people living in and around the affected areas feel about the scheme.</p> <p>A link to our website is attached below. This should hopefully answer any questions you have about the scheme.</p> <p><u>Selective licensing of privately rented properties - Housing</u></p> <p>You can check the maps and the list of street names provided to see if your properties are within the affected areas. I hope</p>	19/11/15

		<p>this information is helpful, please contact us again if you have further questions or issues to discuss.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
06/11/15	<p>Hi,</p> <p>Please can you advise if the proposed fees would apply if the house is let and managed through a letting agency?</p> <p>I own a house in Fletton and maintain it to a very high standard. It is let through brookdale property management who ensure that the required standards are met and maintained.</p> <p>To propose that I need to pay £600 to be allowed to continue to let out my house seems totally unjustified and I would appreciate clarification on whether this fee applies.</p> <p>Regards</p>	<p>Dear,</p> <p>Brookdale's website appears to state that they are registered with the National Landlords' Association, which is one of the organisations that governs Landlords. The industry organisation for letting agents is the Association of Residential letting Agents (ARLA).</p> <p>If you (as a landlord) have accreditation from NLA or the Residential Landlords' Association (RLA) your fee will be £50 per property for the entire five year period. Likewise if the property is managed by an ARLA accredited agent the fee is also £50.</p> <p>It is proposed to charge landlords without accreditation (or without accredited managing agents) a fee of £600.</p>	19/11/15
06/11/15	<p>(Request for questionnaire)</p> <p>Hello,</p> <p>has received a letter about selective licensing.</p> <p>Kind regards,</p>	<p>Consultation questionnaire sent to Mr xxxx from Athene on 11/11/15.</p>	11/11/15
09/11/15	<p>As requested I have just completed the questionnaire about the council's proposals for Selective Licensing. I am a landlord of a one bedroomed house. I do not live in the area so I have the following comments to make about the consultation: The questionnaire is aimed at solely at tenants and local</p>	<p>Dear Ms xxxx,</p> <p>Many thanks for taking the time to respond to the consultation.</p> <p>The questionnaire is not aimed solely at residents and tenants. The views of landlords are vital to the consultation and the</p>	19/11/15

	<p>residents. There is no scope for private landlords to give their views. This suggests that the exercise assumes that most landlords are not responsible or employ letting agents to ensure that correct standards are maintained.</p> <p>The views of landlords should be obtained if the consultation exercise is to be considered valid.</p> <p>The likely cost for the landlords of single property I consider to be unreasonable. In my case this would at least 2 months' income over and above the fees paid to the managing agent.</p> <p>If the requirement for licences is introduced I consider that many landlords such as I will sell their properties, the buy-to-let market will dry up and thus reduce the availability quality rented accommodation in the areas where this is most needed.</p> <p>If the scheme goes ahead I will certainly be giving my tenant notice to quit and will sell the property.</p>	<p>questionnaire asks respondents to indicate whether they are landlords, owner occupiers or tenants.</p> <p>Many landlords also experience problems with other less reputable landlords in their area and we aim to capture this response. Equally, the questionnaire asks for indications of anti-social behaviour and crime, which a landlord may have strong views on.</p> <p>The proposed pricing of the scheme encourages landlords to be accredited by a national organisation like the NLA or RLA. If you are accredited, or use an ARLA accredited managing agent to manage your property, the fee over the five year period is only £50 per property. Accreditation provides proof that you are acting responsibly as a landlord and are aware of your obligations. If you or your agents are not accredited the fee is £600.</p>	
09/11/15	<p>Dear Sir/Madam,</p> <p>I have received a letter regarding Selective Licensing from your office.</p> <p>I haven't yet filled in the questionnaire but I have seen that 47, Fane Road, PE4 6ER has not been selected and besides, the property is managed by a comprehensive package with Brookdale Property Management, 1144 Lincoln Road, PE4 6BP, which requires gas, electricity and other regular checks.</p> <p>Before I do anything else, I would like to know whether the house is included in this proposal?</p> <p>Thank you in advance,</p> <p>Best regards from,</p>	<p>Dear Mrs xxxx</p> <p>There is information on the PCC website which elaborates on which areas the Selective Licensing scheme would affect. There is a link attached below</p> <p><u>Proposed areas - Selective licensing of privately rented properties</u></p> <p>I can say that 47 Fane Road is not listed as one of the properties in the street that will be affected; however we value your feedback all the same.</p>	19/11/15

		Sent on behalf of Selective Licensing Project Team	
09/11/15	<p>I would like to point out that your information regarding the areas of selective licensing have an error. The area you describe as Orton Longueville is actually Orton Malborne and needs to be amended accordingly.</p> <p>Regards</p>	<p>Dear Ms xxxx,</p> <p>Thank you for bringing this to our attention. As you have stated the area is in Orton Malborne and we will look at varying the maps</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
09/11/15	<p>Dear Sirs</p> <p>I have completed your on-line questionnaire, but I feel that it did not give me the opportunity to express any really opinions on the proposed scheme.</p> <p>As a landlord of one terrace property in Woodston, which I have managed by Brookdale Property Management. I feel that your proposal is unfair and penalises good landlords like myself.</p> <p>I also feel that if the proposed scheme goes ahead, then it should cover the whole area of Peterborough and not just selective areas. A bad or rouge landlord could have a property in any part of Peterborough and not just in the areas covered by your proposal.</p>	<p>Dear Ms xxxx</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents. If you or Brookdale has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600</p> <p>In their 2014 guidance note "Review of Property Conditions in the Private Sector", DCLG states that, "The Government does not support the use of licensing across an entire local authority area". It adds, "Such an approach is disproportionate and unfairly penalises good landlords". Any Licensing scheme should therefore be, as the name suggests, selective. It should identify those areas where there is greatest using the six criteria listed in the changes to the 2004 Housing act in April 2015. These are: Crime, deprivation, anti-social behaviour, poor housing conditions, migration, and low housing demand.</p>	19/11/15

		Sent on behalf of Selective Licensing Project Team	
09/11/15	<p>Dear Sirs,</p> <p>Having just read all the information regarding this proposal, I must say I am appalled! Myself and wife have owned and rented out a 1 bed property at xxxx for over 3 years now without any 'help' from Peterborough City Council.</p> <p>Unless I'm reading things wrong, it looks like you intend to charge me <u>£600</u> to say I am a 'fit' landlord. You have got to be joking ! I would rather sell the property that pay one tenth of my income to a party who have no input into my property. We as responsible private landlords are not the problem here, but as usual, it's easier to target everyone than those causing the issues. Our property has, and will always, be managed by a letting agent of our choice. All regulations are fully complied with and tenants are correctly checked before an AST is offered to them. I do not need 'guidance' from you or anyone else.</p> <p>All I see here is more ways for the cash strapped council to make money at others expense. I for one will not put up with this and should this be put through the property will be sold and I will put my money into another town or city.</p> <p>I do hope that my, and I guess, many others views will be looked at and the 'correct' decision made. I'm not holding my breath though.</p>	<p>Selective Licensing</p> <p>Dear Mr xxxx</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents. If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. The fee is a business expense and is therefore tax deductible.</p> <p>We would encourage you to attend one of the drop in sessions that are taking place around the city and meet with the Selective Licensing team.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15

	Regards		
09/11/15	<p>I have received a letter regarding selective licensing and would like to confirm if my property would be in a designated area for this Could you please confirm by email if this is the case.</p> <p>My view for what it's worth is that Landlords will view it as a tax and a business cost and will pass it on to tenants by increasing rents so the tenants will bear the cost which is unfair as most tenants are not that well off hence the reason they are renting and not owner occupiers. The poorer people end up paying more rent and have even less money to spend on essentials like heating and food What an ill thought out bad policy I hope it does not happen.</p>	<p>Dear Mr xxxx,</p> <p>The scheme has been designed to help PCC expose criminal landlords who do not take their obligations seriously.</p> <p>The licence fee structure will encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents. If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. The fee is a business expense and is therefore tax deductible.</p>	19/11/15
09/11/15	<p>Dear Sir/Madam,</p> <p>Please could you let me know where you obtained your information from for the recent letter sent out about Selective Licensing - Your Opinion counts (November 2015).</p> <p>It is just it was redirected to me (as I have moved) and I want to ensure I update the relevant database to reflect my new address.</p> <p>Also please could you let me know if the proposed £600 fee for single property is per year or covers 5 years please?</p> <p>Thank you</p>	<p>PCC to respond on data</p> <p>Dear Ms</p> <p>The licence fee structure will encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents. If you or your managing agent has appropriate accreditation then the fee for the five year period (not annually) is £50 per property (payable no matter when in the five year period it is sought). If there is no accreditation the fee is proposed at £600 for a five year period.</p>	19/11/15

		The Council tax data was used to identify landlords within the proposed areas. You would need to contact the directly on 01733 747474 in order to update your information.	
09/11/15	<p>Dear Mr Chapman</p> <p>Re: Selective Licensing - Your Opinion Counts</p> <p>Thank you for your letter dated November 2015.</p> <p>I am writing to let you know that I have NEVER been (either in the past or presently) a landlord of a residential property in the city.</p> <p>I would therefore be grateful if you would please remove my details from your 'Landlord database'.</p> <p>I am however a private resident of Peterborough and as such I would be interested to receive information regarding the proposals.</p> <p>If you have any further questions, please contact me.</p> <p><u>Please confirm receipt of this e-mail.</u></p> <p>Thank you for your help.</p> <p>Yours sincerely</p>	<p>Dear Mrs xxx</p> <p>The council has sent out over 40,000 letters as part of the selective licensing consultation. They have been sent to residents and businesses in the proposed areas, and those areas adjacent to the proposed areas.</p> <p>We have also written to landlords who have properties in the proposed areas. Without knowing your actual address I cannot confirm which data base your information came from.</p> <p>All data was via the council tax records and not from a locally held landlord database so I can assure you that you are not noted as a landlord.</p> <p>If you would like to provide me with your address I am happy to check in what capacity we have written to you and then confirm whether you should contact the council tax department to amend your records.</p> <p>There is information on the PCC website that details which areas and streets are to be included. A link is attached below for your reference.</p> <p><u>Selective licensing of privately rented properties - Housing</u></p>	19/11/15

09/11/15	<p>Please explain how to respond to the Selective Licensing questions where there are up and down arrows in the answer boxes. When I click an arrow a "yes" or "no" appears but then disappears when I proceed to the next question. Thus I can't review my answers before submitting the form. Please help.</p> <p>Regards</p>	<p>I think this query was sorted via phone as he called in a couple of times last week</p> <p>YES, ATHENE CALLED</p>	11/11/15
10/11/15	<p>Hi</p> <p>I am so sorry but this morning I received a call from Mr xxxx concerning the online form apparently there seems to be an issue with it in as much as when people put information they then move onto the next section but when they do all the information they have previously put in disappears.</p> <p>Would it be possible to task ICT to look into this and for xxxx to be contacted on xxxx.</p>	See above	11/11/15
10/11/15	<p>Hi Team,</p> <p>Please see the details below from a resident who has received some correspondence in the post regarding SL. She has pointed out that it was sent to an old address and wants to confirm which database was used so she can get her details updated;</p> <p>Name:</p>	Data cleanse as above	
10/11/15	Dear Mr Chapman.	Dear Mr xxxx	19/11/15

	<p>It was approx 18 month since you tried to introduce the same selective licensing. This was withdrawn. As a responsible private landlord I contend that this piece of proposed legislation is slanted towards making money for the council coffers. I note that you purposely do not make any mention of the cost to the private rented sector. No doubt this will come later .!</p> <p>HAS THE COUNCIL ALL THE POWERS IT NEEDS TO TAKE ACTION AGAINST BAD LANDLORDS AND BAD TENANTS.?? YES</p> <p>HAS THE COUNCIL ALL THE POWERS IT NEEDS FOR ENFORCING SATISFACTORY CONDITIONS OF HOUSES IN THE RENTED SECTOR. ?? YES</p> <p>THE PRIVATE RENTED SECTOR PROVIDES A VITAL SERVICE TO THE PETERBOROUGH COMMUNITY.</p> <p>BY PLACING ADDITIONAL FINANCIAL BURDENS ON ALREADY HARD PRESSED LANDLORDS, PRIVATE RENTED PROPERTIES WILL BE SOLD OFF. THE COUNCIL WILL THEN BE OVERWHELMED WITH DEMAND FOR HOUSING WHICH THEY WILL NOT BE ABLE TO MEET.</p> <p>I ask that you let me have your response</p>	<p>Selective Licensing brings together different aspects of legislation (some enforced by different agencies such as the Health and Safety Executive and Gas Safety) and enables PCC to proactively ensure all privately rented housing meets the legal requirements that all private rented property is of the same housing standard, not overcrowded and that anti social behaviour is appropriately addressed.</p> <p>It does not impose higher obligations on the landlord but it does allow for easier scrutiny by the local authority.</p> <p>The licence fee structure will encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period (not annually) is £50 per property (payable no matter when in the five year period it is sought). If there is no accreditation the fee is proposed at £600 for a five year period.</p> <p>We reject entirely your statement that this scheme is designed to make money for council coffers. The legislation prohibits Selective Licensing schemes from making a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers (both in the office and on the street) we need to actively pursue the criminal landlords.</p>	
10/11/15	Good afternoon,	Dear Mr xxxx The council wants to sustain long-term improvements in the quality of private rented sector accommodation within the	19/11/15

	<p>You mention that one of the benefits of licensing is the 'Greater ability of landlords to deal with rogue tenants'.</p> <p>Can you please explain how landlords will have a greater ability to deal with rogue tenants? Also, what is the definition of rogue tenants?</p> <p>Regards, Finance Manager</p>	<p>proposed Selective Licensing scheme's boundaries, and understands the need to ensure a balance between the rights and responsibilities of landlords and their tenants. As a result, the council and its partners have either introduced or are exploring the following, additional measures:</p> <ul style="list-style-type: none"> • The introduction of a Public Space Protection Order (in accordance with Part 4 of the Anti-Social Behaviour Crime and Policing Act 2014) within the designated areas. This will focus enforcement and education activity on such things as street drinking, litter and waste management, and other aspects of anti-social behaviour that are largely the responsibility of tenants • The re-structuring of policing and partner and enforcement teams to ensure those areas with the biggest challenges receive the most appropriate targeted resource. These teams will work within the regulatory framework to support landlords who seek their assistance with tenants who commit damage, anti-social behaviour and engage in problematic behaviour • Improved education and effective support for landlords in the management of tenants who cause anti-social behaviour including supporting landlords through the eviction process should it become necessary to seek possession • A review of the current Cumulative Impact Policy introduced under The Licensing Act 2003 that addresses the growth of licensed premises in the Millfield, New England area of the city 	
10/11/15	<p>Hi</p> <p>I have just spoken to xxxx letting agents, they have received letters regarding selective licensing that were not for them and</p>	<p>I telephoned xxxx and resolved this one so no response required – xxxx</p>	10/11/15

	<p>she is unsure what to do with the letters. I believe some are for landlords that she has no dealings with.</p> <p>Their details are: xxxx</p>		
10/11/15	<p>Good afternoon xxxx</p> <p>Mrs xxxx called regarding the above. Please can you call her back on xxxx.</p> <p>Thanks</p>	<p>Not a landlord Please cleanse data</p>	
10/11/15	<p>Following a recent communication from you about selective licensing it has come to my attention that you are using my old address which is xxxx We have moved recently and our new address is: xxxx</p> <p>We are landlords responsible for xxxx. I was interested to read that you propose to licence landlords and feel that it is a really good idea. However, I do not own a property in the proposed area as mine is in the Eye and Thorney ward.</p> <p>With kind regards,</p>	<p>Dear xxxx</p> <p>The address data for landlords was taken from the council tax records at the end of October 2015.</p> <p>At that time the records showed your Hexham address Unfortunately we are unable to update your council tax records on your behalf but if you telephone 01733 747474 the council tax department can do this for you.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	19/11/15
10/11/15	<p>Hello</p> <p>I'm letting out a property in central Peterborough and have some questions I'd like to ask over the phone regarding selective licensing for landlords please. As there is no number</p>	<p>Left message on mobile 12/11/15 13:25</p> <p>xxxx spoke to xxxx on 16/11/15 – no further response required.</p>	16/11/15

	<p>to call, I've been advised by PCC that someone will call back. My number is xxxx.</p> <p>Regards</p>		
10/11/15	<p>Good Afternoon,</p> <p>With reference to your letter dated November 2015. I do not understand why you have sent this to me as I am not and never have been a landlord. I am a joint owner/occupier with my wife of xxxx, Orton Goldhay. We own this property outright.</p> <p>Please amend your records.</p>	<p>Dear Mr xxxx</p> <p>The council has sent out over 40,000 letters as part of the selective licensing consultation. They have been sent to residents and businesses in the proposed areas, and those areas adjacent to the proposed areas, (which is where your address falls in).</p> <p>All data was via the council tax records and not from a locally held landlord database so I can assure you that you are not noted as a landlord.</p> <p>There is information on the PCC website that details which areas and streets are to be included. A link is attached below for your reference.</p> <p><u>Selective licensing of privately rented properties - Housing</u> Sent on behalf of Selective Licensing Project Team</p>	19/11/15
10/11/15	<p>Dear Sirs</p> <p>I have received information regarding Selective Licensing in Peterborough.</p> <p>I own a two-bedroom house at xxxx, Peterborough. I cannot identify from your map if my property is in a proposed area.</p> <p>If I am affected I do not see where there is any questionnaire regarding people who own one property and let it out through a professional agency - in my case xxxx. The questionnaire on the internet is only aimed at residents who live in the areas on</p>	<p>Dear Mr xxxx</p> <p>Many thanks for taking the time to respond to the consultation on 10th November, and for your second chasing email on 13th November. Over 40,000 residents and businesses were written to: you will therefore appreciate that we are dealing with a large number of responses.</p> <p>Both the detailed maps and the list of street names on our website show that xxxx is included in the proposed area – we would point out though that these areas have been chosen purely on the evidence base for the six criteria set out in the</p>	19/11/15

	<p>the map. I am afraid the map is a very poor way of showing possible affected areas; there is no definitive detail of the areas subject to the proposal.</p> <p>I would like to know why the proposals would mean me having to pay £600 extra for a property that is well managed through a well-known agency and is not subject to any of the problems you suggest in certain areas.</p> <p>Also, I can see many people in my position who will need to evict the tenants in order to sell the property. It all seems another way to take money from responsible people because the Council are not using the powers available to resolve any problems outlined.</p> <p>I wish to receive you comments asap.</p>	<p>amendments to the Housing Act, which are listed on our website, and may change once the consultation has been concluded.</p> <p>The licence fee proposals make it clear that if a landlord is an accredited member of either the National Landlords' Association or the Residential Landlords' Association, or if the managing agent is registered with ARLA, the fee for the five year period is £50 per property. Without these accreditations the fee would be £600. This will allow the council to be confident that the property is being managed in a responsible way.</p> <p>The questionnaire is aimed at landlords (and their experiences with tenants and anti-social behaviour), tenants and other residents.</p> <p>We would encourage you to attend one of the many drop-in sessions being held around the city and to chat with the council team about the proposals.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
11/11/15	<p>Dear Sir/Madam,</p> <p>Please see below original email sent on Saturday 7th Nov 15.</p> <p>'Please could you let me know where you obtained your information from for the recent letter sent out about Selective Licensing - Your Opinion counts (November 2015).</p>	PCC data cleanse plus earlier email response	

	<p>It is just it was redirected to me (as I have moved) and I want to ensure I update the relevant database to reflect my new address.</p> <p>Also please could you let me know if the proposed £600 fee for single property is per year or covers 5 years please?'</p> <p>On Tuesday (10th Nov 15) I did call 01733 747474 and they took a message for somebody to call me back (after being passed around to the wrong departments) they said I would receive a call yesterday but I did not receive a call back. I also sent this email on Saturday to which I have only had an automated message saying we do not response to queries (why even have an email address then?)</p> <p>Poor service! Please could somebody respond to my email answering my queries above.</p> <p>Thank you for your assistance.</p>		
11/11/15	<p>Dear Peterborough council, following up on your recent letter regarding your consultations with regards to selective licensing i have the following comments to make. The survey did not give me any scope to state a proper opinion.</p> <p>I am landlord with 19 Peterborough based properties, . I use an ARLA and NAEF affiliated letting agent to fully manage these properties. The proposed licensing system makes a mockery out of my use of a professional , qualified lettings agency. ARLA already has exacting professional standards, Tenants are treated as clients ,all landlord responsibilities and safety checks are adhered to , maintenance and problems dealt with in a timely and professional manner. The majority of landlords who use these accredited professional services should be exempted from this type of licensing which is aimed, and quite rightly, at</p>	<p>Dear Mr xxxx</p> <p>Many thanks for your response. We are glad that you are taking your responsibilities as a landlord seriously. However, many are not.</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no</p>	19/11/15

	<p>rogue landlords who give us all a bad name. I have had property in Toftland Deerleap, Brynmore, Queens walk for a number of years , these areas are not bad areas , i have had no reports of nuisance neighbours, flytipping , anti social behaviour and in some of these cases have long term tenants who have been very happy in these streets. I am struggling to see how these streets have been selected for this scheme. I feel it will indicate to future tenants that the selected areas are not nice places to live, driving down property prices and rental demand , in fact almost a self fulfilling prophecy which will only attract problem tenants from other areas of the city to create a super bad area. If selective licensing is introduced , i will most certainly pass on the costs to the tenants, . The lettings industry is becoming more regulated and a target for government and local government money making. Recent costs have included more regulatory checks , smoke alarms , increased gas and electrical safety checks Pat tests, removal of mortgage interest relief, effectively taxing us on our turnover rather than our profit, increase tax on buildings insurance, increased costs from contractors for gas safety certificates. As these costs increase it is becoming harder to make a financial case for carrying on. If licensing is introduced i would certainly seriously consider a program of property disposal, some long term tenants and socially housed tenants would be evicted and their homes sold. Please think this through very carefully and ensure that professional and responsible Landlords using professional and responsible accredited agents are not financially penalised for the few rogue landlords. Kind regards xxxx Landlord</p>	<p>accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords like yourself, and this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>The legislation prohibits Selective Licensing schemes from making a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers (both in the office and on the street) we need to actively pursue the criminal landlords.</p> <p>Contrary to your assertion that the proposals will be a “self-fulfilling prophecy”, we are of the opinion that doing nothing will see the areas decline further, perhaps irretrievably, and that SL will in fact give us the tools to ensure that we lift the quality of both the properties and the communities through the proactive pursuit of criminal landlords and anti-social behaviour.</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
12/11/15	<p>Dear Sir, I am a landlord in Peterborough and intend to undertake the necessary steps to acquire accreditation with a nationally recognised organisation. I have been a member of the</p>	<p>Dear Ms xxxx</p> <p>Being an accredited member of the RLA qualifies a landlord for the discounted £50 fee.</p>	21.12.15

	<p>Residential Landlords Association for 6 years and before I undertake to comply with their scheme requirements for accreditation I need to know that this is scheme is acceptable to you.</p> <p>I should be grateful if I you could confirm that the Residential Landlords Association's scheme is recognised by Peterborough Council as a nationally recognised scheme.</p> <p>Yours faithfully</p>	Sent on behalf of Selective Licensing Project Team	
12/11/15	<p>Please can you advise customer if the selective licensing covers Glebe Road or not.</p> <p>Please can you telephone customer to advise.</p>	Telephoned 13/11/15 and confirmed yes, and asked her to notify her landlord	13/11/15
13/11/15	<p>I emailed you on 10 November 2015 listing comments and questions about the selective licensing consultation. In your acknowledgement reply you did not address the questions I asked. How can you consult upon a subject if you do not communicate information when questions are asked. As I have received no information from you I fail to see how the City Council can consider my feedback on information I have not been given.</p> <p>I trust you will now send the necessary information in order that I may raise further questions if necessary. Also it will save me having to make a strong complaint to the City Council about the way this consultation is being handled.</p>	See above email	
13/11/15	<p>xxxx would like a call back today regarding a questionnaire that he is currently filling out and have questions about. Contact number is xxxx.</p>	Called and discussed. He's in favour apart from cost	13.11.15
13/11/15	<p>Please see the details below from a resident who has received some correspondence in the post regarding SL. He has pointed</p>	No response needed. It is the tenant who has called to tell us who his landlord is. The landlord has had a letter in his own right as has the tenants.	

	out that it has the incorrect name as he is the landlord of the property;		
13/11/15	<p>Hello,</p> <p>Please could someone contact a xxxx, he is a landlord in Peterborough and has some question about it.</p>	<p>To call 19/11/15</p> <p>Athene to call again.</p>	
13/11/15	<p>Please find attached letter - looking forward to receiving your comments, observations and assurances.</p> <p>Thank you</p> <p>Dear Sir</p> <p>Thank you for your letter.</p> <p>Please note that xxxxxx.</p> <p>The completed questionnaire is being returned on line but there are a number of important points which we wish to draw to your attention. There is no facility to do this via the questionnaire (which appears to be managed by an American consultancy).</p> <p>The questions posed in your document are very biased in favour of tenants. There appears to be little interest in obtaining information on how landlords and their properties can be abused by tenants.</p> <p>Following serious surgery for cancer of the oesophagus in 2002, xxxx was forced to retire prematurely. Pension arrangements were with the failing Equitable Life. The family's financial budget was very seriously compromised. It was impossible to live on £65/week incapacity benefit and we</p>	<p>Thank you for your letter regarding the above proposals.</p> <p>We understand that some landlords suffer at the hands of "rogue" tenants, as you have, although it is thankfully a small minority.</p> <p>The aim of Selective Licensing is to improve the awareness of both landlords' and tenants' obligations, and to increase the incidence of formal tenancy agreements being put in place which obviously clarify the required actions of each party. Although (as you know to your cost) this will not eliminate the poor behaviour of some tenants, or some landlords, it will hopefully lead to a general improvement in standards</p> <p>As a result of a number of comments made about tenants responsibilities we are introducing additional training for tenants to raise awareness about responsibilities. In addition we will be looking to introduce a Public Space Protection Order coterminous with any finally agreed Selective Licensing boundaries and are creating a joint prevention and enforcement team that will more effectively deal with the perpetrators of anti-social behaviour than we have to date. Our Selective Licensing Team will aim to work with landlords to deal with poor tenants to resolve issues as early as possible.</p>	

	<p>chose not to seek social security assistance at tax payers' expense.</p> <p>To mitigate the difficult situation, it was decided to sell the UK home and relocate to France, where property was significantly cheaper. Once state pensions eventually came into effect, it was possible to reconsider returning to the UK. We missed our family.</p> <p>Thus, Stanground was purchased. It took some years to sell the property in France. We were obliged to remain French residents until a sale was finally completed in 2013. Then we were able to buy the present property in Oundle (where close family live). The Stanground property was put up for sale but as the months passed, no offers were received. It was decided to let the property in October 2013.</p> <p>When let, that property was in very good condition, clean and impeccably presented. It had been our part time "home" and was as we would expect for ourselves or for any tenant.</p> <p>Over time, the tenant virtually ignored all the terms and conditions of the agreed contract. Eventually vacating the property without giving any notice whatsoever. It was left in filthy condition with rubbish and litter scattered everywhere internally and in the garden.</p> <p>There was damage to various fittings and carpets (beyond repair), including burns. No attempt had been made to clean and leave the property in reasonable condition. Used razors and other items were left scattered in the dirty shower and bath.</p> <p>A fence had been seriously burned, which in turn had caused fire damage to adjacent willow (protected) and apple tree.</p>	<p>I hope that this addresses the points raised but should you require any further information please do contact me.</p>	
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Parked vehicles would have been endangered – there could well have been a major incident.

A brown Council rubbish bin was left full to the brim with excrement.

There was no way the property could be either relet or sold without a massive amount of work and attention.

Bag upon bag of “rubbish” had to be cleared. Rubbish which appeared to have been dumped in the stream at the end of the garden, had to be removed to avoid blocking the water flow.

Graphic photos showing the property when first let and when the tenant departed, unannounced, are available and speak for themselves.

We are telling you this sorry tale to emphasise that not all landlords are “bad landlords”.

Certainly tenants need to be suitably protected against bad landlords and unreasonable and illegal behaviour. **However it must be stressed that there should not be an unfair bias against reasonable, responsible landlords.**

In the case of the Church Street property, **all the requirements outlined in your questionnaire were provided at the outset of the tenancy (eg fully detailed contract and conditions, appropriate safety certificates, user guides for hot water and central heating and cooker, fire and carbon monoxide alarms – BUT ALL TO NO AVAIL – *the tenant largely ignored everything agreed, including giving notice to leave.***

Selective licensing must very carefully protect the interests of both tenant and landlord and must result in a genuine improvement in the localities where it is introduced. **It should**

	<p>not be simply a way of raising more money for the local authority.</p> <p>Landlords are penalised by having to pay council tax on unoccupied properties awaiting rental.</p> <p>Extra costs incurred by landlords will probably be passed on to tenants via rent increases. If conditions imposed on landlords are too arduous or unfair, many private individual landlords will reconsider the wisdom of continuing to let their property.</p> <p>Thank you for taking the time to read these comments. Hopefully you will see the validity in them and the relevance to any licensing regulations you intend to impose.</p> <p>Yours sincerely</p>		
13/11/15	<p>Owner of 12 rented properties throughout the UK - 6 in Peterborough.</p> <p>mjl have received you letter regarding Selective Licensing and read your questionnaire.</p> <p>Your website states that: "Your views are important to us and we would like to hear what you think about the proposed Selected Licensing scheme. We are, therefore, consulting about our proposals".</p> <p>and your letter states: "To do this we need to ensure we consider your views on the proposals".</p> <p>Having read the questionnaire and looked at the website, there is NO provision for feedback in the questionnaire and your 'exhibitions' are for the Council to put their point of view. This</p>	<p>Dear Mr xxxx</p> <p>The questionnaire seeks to balance feedback from landlords, owner occupiers and tenants. This email address is provided specifically for the response you have now provided. In addition, the exhibitions are forums specifically designed for you to attend and provide feedback – please do come along.</p> <p>Under DCLG guidance the council needs to be able to explain their rationale and the exhibitions provide a face to face method for doing that.</p> <p>For Q6 we will assume that 1 will indicate no real problem For Q12, please see Q11, which asks if landlords make a positive contribution. For Q13, we are asking residents if they think these issues are important. If they do not, and the population believes actions</p>	21.12.15

<p>is not a consultation process in any form!</p> <p>The questionnaire does not approach the subject from a neutral point of view, it approaches all questions putting a view that the Selective Licensing will/may solve any issues - this is an appallingly written and biased questionnaire - it's like asking "when did you last beat your wife".</p> <p>Questionnaires should be balanced and not lead or promote a certain point of view.</p> <p>Questions like:</p> <p>6. Thinking about the area, how much of a problem are the following on a scale of 1-10, with 10 being the highest problem and 1 being the lowest (please tick)</p> <p>You are telling the reader that there is a problem, not asking if there is a problem. There is no option to say "none of the above".</p> <p>12. Do you think some private landlords make a negative contribution to your area?</p> <p>This leads the reader. This question should ask if Landlords make a negative or positive contribution in your area?</p> <p>13. Do you agree that private landlords should take the following actions:</p> <p>You are asking the reader to agree with your point of view, not if they think there is an issue!</p> <p>General:</p> <p>It is not the Landlords responsibility to 'police' their tenants from an Anti Social Behaviour perspective - Landlords are not the police and have no authority to decide what Anti Social</p>	<p>like these are not required, it will inform the need for Selective Licensing being introduced in the first place.</p> <p>With regards to Anti-social behaviour, DCLG guidance states that Selective Licensing must not be introduced unless it is complemented by other actions undertaken by the council, and we recognise that anti-social behaviour in itself is often nothing to do with the landlord.</p> <p>Two of the complementary council actions are an extension of the Cumulative Impact Policy (which will seek to limit the number of off-licences, which can fuel street drinking and anti-social behaviour) and the introduction of a Public Space Protection order in certain areas, which is aimed at reducing the large and often intimidating groups that can gather on the street.</p> <p>In addition, Selective Licensing will increase the number of landlords using formal tenancy agreements (usually Assured Shorthold Tenancies), and these agreements set out the obligations of the tenants in terms of overcrowding, quiet enjoyment by them and the neighbours, and waste disposal. Landlords can then take action if required.</p> <p>We recognise that anti-social behaviour in itself is often nothing to do with the landlord</p> <p>Overcrowding is a serious issue, leading to increased damage to the property fabric and also exacerbating public health problems (the incidence of TB in Peterborough has been growing, and overcrowding is thought to be partly to blame).</p> <p>We would like to reiterate that, unlike many such schemes across the UK, Peterborough's proposed charging regime for SL reflects a significantly discounted fee of £50 over the five year</p>	
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	<p>Behaviour may or may not be. The council and Police are absolving themselves of their responsibilities if they move this responsibility to the Landlord. Many Landlords do not live in the area of their properties, like me, they may not even live in the country - how are they to control tenants. What exactly do you expect the Landlord to do - ask them nicely to stop?</p> <p>The vast majority of Landlords are excellent, the few that are bad do not enter in to 'schemes' and never will.</p> <p>Much of the over crowding of rented properties (HIMO) is due to tenants wanting to keep individual costs down, this is why they seek out unregistered Landlords - what makes you think Selective Licensing will change this?</p> <p>The vast majority of Landlords use registered Agencies to run their properties, these agencies make sure that all legal responsibilities are undertaken - why penalise these Landlords? I see nothing in your proposals NOT to charge Landlords that have their properties managed by registered agencies - why not?</p> <p>Any Selective Licensing costs will have to be passed on to the Tenant.</p> <p>It is the responsibility of the Council to deal with poor Landlords and Anti Social behaviour, there is sufficient existing legislation in place to deal with it. It requires the council to do their elected job. It is not the responsibility of the Council to levy a tax on Landlords because the Council is failing in its elected duty.</p> <p>Additional Selective Licensing fees will not add any additional 'weapons', it is only a tool to move the blame for the issues from the Council to other areas.</p>	<p>period for those landlords accredited with national bodies (NLA, RLA) or using an ARLA accredited managing agent, versus £600 if the landlord or agent are not so accredited.</p>	
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14/11/15	<p>Dear Sir/Madam</p> <p>I have looked at your website about the proposed selective licensing scheme following receipt of your letter. However, it is not clear from the diagram or the street list if our property is within the proposed area, please could your let us know, the property is: xxxx</p>	<p>Dear Ms xxxx</p> <p>xxxx does not fall within the Selective Licensing, at this stage, xxxx falls within the selected area, however, you are an important consultee as you live within a core area that has been selected.</p> <p>Thank you once again for your email.</p> <p>Sent on behalf of the Selective Licensing Project Team</p>	21.12.15
15/11/15	<p>Dear Sirs</p> <p>I have completed your questionnaire but it is not fit for purpose for a landlord of properties in the selected area. It gives no opportunity for landlords to state their views.</p> <p>I am an old aged pensioner and have 2 properties in your proposed licencing area, which I rent out to provide additional income, both through a responsible management company. The properties are maintained in excellent condition at all times. I resent having to pay, because obviously there will be a fee, for a licence which you think will enable you to manage poor landlords. I will need to charge tenants more rent to cover the cost and the scheme will make no difference to those landlords that presently fail to maintain their properties to a reasonable standard.</p> <p>You should have enough powers under the Housing Act and other legislation to manage poor landlords without penalising landlords that ensure high standards are met.</p>	<p>Dear Mr xxxx,</p> <p>The questionnaire is designed to capture views of landlords, owner-occupiers and tenants. The email address (which you are using) is there for you to use to state your views.</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords like yourself, and this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p>	21.12.15

	Licencing is not the answer and will simply raise rents in the area. The scheme is flawed and I suggest you reconsider.		
15/11/15	<p>To Whom It May Concern,</p> <p>I am a private landlord and am appalled at the selective licencing proposal for many reasons.</p> <p>Whilst I am a private landlord, I let my property through a reputable agency who ensure that standards are met by both the tenants and the landlord. They ensure gas certificates, smoke alarms and (something the council have not mentioned) carbon monoxide monitors are in place and working, as well as many other things such as regular inspections etc... Therefore why should I be paying for a selective license, when my property is already managed to a very high standard?</p> <p>This proposal appears to advocate for the introduction of extorting money out of responsible landlords, in a bid to solve problems caused by a few bad eggs, rather than identify and deal with these individuals in isolation, all under the pretense of tackling larger issues of anti-social behaviour, crime and a low standard of living. What you would actually be doing in many cases is making landlords pay for something that they don't need and pushing rental prices for those on low incomes up.</p> <p>I'm also concerned that the questionnaire does not openly request specific feedback at any point, only asks you to answer the councils questions, some of which are irrelevant - for example, my address is no longer within Peterborough, however I lived on the street in question for almost 12 years prior to moving in 2014. So I do not live in any of the areas</p>	<p>Dear xxxx</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords like yourself, and this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>We do not feel that, for responsible landlords, this fee will result in increased rents.</p> <p>The questionnaire is designed to deal with landlords, owner-occupiers and tenants, and is aimed at seeking their views on the area in which they live.</p> <p>You are correct in quoting that the council has only selected those areas that are also above the Peterborough average in at least five of the six criteria set out in the Housing Act.</p> <p>The data to back up our analysis is clearly shown on the website under the Supporting Documents tab. Please take some time to review this and by all means come back to us if you are unsure or unsatisfied. We would also add that the</p>	21.12.15

<p>specified as options given. Mistakes like this make the questionnaire not look credible and like it's just been thrown together for appearances sake.</p> <p>Another point I'd like to raise concern with is that I do not see how tenants having their landlords contact details is appropriate when they are renting through an agency, and quite frankly this should not be any of the councils business. Yes, they should have contact details in relation to the property they are renting, but not necessarily of the landlord - another oversight on the questionnaires wording or a genuine point the council believes relevant?</p> <p>The FAQ section about selective licensing states:</p> <p>The council has, however, only selected those areas that are also above the Peterborough average in at least five of the six criteria set out in the Housing Act.</p> <p>These are:</p> <ul style="list-style-type: none"> o Low housing demand o A significant and persistent problem caused by anti-social behaviour o Poor property conditions o High levels of migration o High levels of deprivation o High levels of crime <p>However, no data to support this statement is provided and as a previous resident in one of these areas, I would strongly disagree with it. It is also worth mentioning at this point that during my 12 year residence on the street in question, the only</p>	<p>areas chosen – although entirely and solely on the evidence of the data – are part of the consultation and we may well change the boundaries as a result of feedback.</p> <p>I confirm that it would be appropriate and acceptable for a managing agents details to be provided to the tenants where a property is managed as such. The point being that tenants know who is managing a property and have appropriate contact details so they can report problems and have access to a responsible person in the event of an emergency.</p> <p>The fee is a one off payment for a licence that would last up to 5 years. The council can only use the fees charged for the administration of the scheme which includes the processing of the licence application, inspection and carrying out the relevant fit and proper person and compliance checks. All these costs are incurred as part of the licence application process and as such no refund is offered should a landlord sell the property or cease to rent it during the licensing scheme period.</p>	
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	<p>anti-social behaviour witnesses was a result of council tenants (for which the properties appeared never to be inspected by the council with one in-particular always having refuse dumped outside it) and that from the football supporters making their way home through the streets (probably because the police presence for matches does not extend further than the Posh grounds).</p> <p>There is no mention of a refund in the FAQs if you cease being a landlord within the 5 year period paid for or discounts should you own multiple properties, or manage multiple properties. I believe the latter has been done in other cities where this license has been introduced, to make it more affordable for private landlords when using an agency as they pass some or all of the multiple discount on.</p> <p>Please confirm receipt of this email and details of how my feedback will be used in the assessment of this proposal at your nearest convenience or within five working days.</p> <p>Yours sincerely,</p>		
16/11/15	<p>I have not had a reply to my email. Please could you respond thank you.</p> <p>Dear Sir/Madam,</p> <p>Please see below original email sent on Saturday 7th Nov 15.</p> <p>'Please could you let me know where you obtained your information from for the recent letter sent out about Selective Licensing - Your Opinion counts (November 2015).</p>	<p>Dear xxxx</p> <p>Apologies for the delay in responding to your email. I confirm that they data used for sending out the consultation documents was obtained from the council tax records. If you need to update your information you can telephone 01733 747474 and it can be arranged for your.</p>	21.12.15

	<p>It is just it was redirected to me (as I have moved) and I want to ensure I update the relevant database to reflect my new address.</p> <p>Also please could you let me know if the proposed £600 fee for single property is per year or covers 5 years please?'</p> <p>On Tuesday (10th Nov 15) I did call 01733 747474 and they took a message for somebody to call me back (after being passed around to the wrong departments) they said I would receive a call yesterday but I did not receive a call back. I also sent this email on Saturday to which I have only had an automated message saying we do not response to queries (why even have an email address then?)</p> <p>Poor service! Please could somebody respond to my email answering my queries above.</p> <p>Thank you for your assistance.</p>	<p>With regards to the fee, it is a one off payment for a licence that would last up to 5 years. The council can only use the fees charged for the administration of the scheme which includes the processing of the licence application, inspection and carrying out the relevant fit and proper person and compliance checks. All these costs are incurred as part of the licence application process and as such no refund is offered should a landlord sell the property or cease to rent it during the licensing scheme period.</p> <p>Sent on behalf of Selective Licensing Project Team.</p>	
16/11/15	<p>Dear Sirs,</p> <p>I have pleasure in returning questionnaire regarding Selective Licensing which seems to have been cleverly worded in such a way that the desired response is received.</p> <p>I fully understand the Council's wish to monitor private housing in Peterborough but I cannot understand why they are unable to do this with the information they already hold without imposing a charge on the landlord.</p> <p>Any charge will undoubtedly be passed on to the tenant, thereby increasing rents. I suspect that tenants are probably unaware of this; it has of course been omitted from the questionnaire.</p>	<p>No Response needed. Call returned on 13.11.15</p>	

	<p>Unscrupulous Landlords will inevitably not register if they do not already inform city council that they rent property for council tax purpose or indeed HMRC for tax purposes.</p> <p>Whilst I am in favour of steps taken to improve standard of housing in Peterborough and prevention of crime and anti-social behaviour I am not convinced that the proposed Selective Licensing will have much affect, other than to impose a rent increase on tenants.</p> <p>Finally I think the proposed charges are unnecessary and excessive and the cost of collection from all landlords will probably exceed the amount collected. I therefore wish to record my strong objection to the charge.</p>		
<p>Email to AC on 03.11.15</p>	<p>Hi Adrian,</p> <p>I have copied you into an E mail I have sent in response to the proposed scheme. I am fully aware that you will have a team working on this but did want you to know we have strong views about it .I understand that individual concerns raised are not respond to by the council which is a pity. I believe local government should be fully transparent and if points are raised they should be answered in the course of time.</p> <p>I hope that someone can explain why this road is not listed with a property known to be let out. There may be others. A full and detailed check has to be made of every single property in all the roads included to verify if they are owner occupied or let out. Council tax records will give many answers although dodgy landlords may register a property in their own or family members name and pay council tax as if they live in the property. You will be fully aware that cash is collected for many let properties in order to bypass authority.</p>	<p>Dear Mr xxxx</p> <p>The consultation website and supporting documents shows how we have chosen the core areas for this consultation. There are of course rogue and criminal landlords in every area but we are keen to have a strong evidence base to support why certain areas have been chosen. Please take some time to review the evidence base (under Supporting Documents on the website) and please also come along to one of the exhibitions to share your views with the team.</p> <p>We are aware of “cash-in-hand” activity across the city – if you have specific information please do share it with us so we can inform our enforcement officers.</p>	<p>19/11/15</p>

	Do hope you are both well.		
17/11/15	<p>Subject: Selective Licensing - rented property in Meadenvale, Parnwell</p> <p>Hi,</p> <p>As a landlord I am totally against selective licensing, probably because I am, as many others are, a decent landlord.</p> <p>I also do not believe that licensing landlords will alleviate any of the issues you mention as councils already have the powers to deal with rogue landlords and poor quality housing, so if you are having problems then maybe you should look at yourselves first.</p> <p>I also own properties in Milton Keynes which went through the same process and it was decided in the end that they wouldn't adopt selective licensing for precisely these reasons, in addition to the amount of admin that would be caused by implementing it.</p> <p>Not that it will bother you but I for one will be selling my house if it comes in and I can also see a few other landlords selling, not only because of things like selective licensing but more recently the governments plan to reduce interest tax relief on mortgages. It seems like landlords have become a target to extract money.</p> <p>of course if landlords decide to sell it then causes problems for councils as the amount of available rented accommodation goes down and I for one believe that private landlords play a large part in housing people in this country. Yes, things need to</p>	<p>Dear Mr xxxx,</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords like yourself, and as mentioned this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>We do not think that a £50 fee is unduly onerous to a good landlord over a five year period and will not impact – on its own – on the investment decision.</p> <p>Selective Licensing brings together different aspects of legislation (some enforced by different agencies such as the Health and Safety Executive and Gas Safety) and enables PCC to proactively ensure all privately rented housing meets the legal requirements that all private rented property is of the same housing standard. At present the council must wait for a problem (like a gas explosion!) before it can act.</p>	19/11/15

	<p>be done properly but like I have already said you have those powers already.</p> <p>Regards,</p>	Sent on behalf of Selective Licensing Project Team	
17/11/2015	<p>Dear sirs</p> <p>I am a private landlord in one of the areas ear marked for selective licensing. I have just filled out your useless on line questionnaire which does not really give people the option to view their opinion on the proposed scheme but steers them into answering questions about high levels of crime and anti-social behaviours in the areas ear marked for the licensing scheme which of course will be your argument to introduce the scheme. I previously lived in the house I rented out and was the victim of a burglary and no one seemed very interested about crime levels at that time, now it seems you are suggesting landlords are in some way responsible for this? More like unemployment, drug/ alcohol addiction and poverty is the cause.</p> <p>The police and local government to manage the level of crime and anti-social behaviour in the area it's ludicrous to think landlords alone are responsible for the decline in these areas. Yet another 'money making' scheme when we already pay more in taxes. I did not become a landlord by choice it was just that I was not in a position to sell when I bought my new house, but as soon as I can sell I will. I have a very reputable agency manage the property and it's kept to a very high standard.</p> <p>They manage any new regulations that are introduced such as gas checks, smoke detectors etc. They ensure there properties</p>	<p>Dear Mrs xxxx</p> <p>Thank you for your email.</p> <p>We recognise that anti-social behaviour in itself is often nothing to do with the landlord.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>If you are your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure, the city council has tried to favour good landlords like yourself.</p> <p>The Selective Licensing consultation allows feedback from both landlords and tenants – which we are always keen to receive tenants feedback on their landlords.</p>	18.12.2015

	<p>are kept to a high standard for both Tennant and landlord so I already pay an agency to do all the things your proposed scheme will do. This all seems rather one sided to me what about the tenants? I have been lucky to have 2 good sets of long term tenants but not everyone is so lucky.</p> <p>If tenants are not happy then maybe there should be a way of reporting rogue landlords rather than penalising the goods ones or even spot checks on rental accommodation to see which ones are up to scratch. You will push private landlords out of town into rural areas where you will have even less control of property standards. Maybe the government need to do more to make housing affordable that will reduce the high demand for rental properties. Either way I think your plans need careful consideration.</p> <p>Kind regards</p>	<p>Thank you once again for your email.</p> <p>Kind regards Selective Licensing Project Team</p>	
18/11/2015	<p>Thanks for the invitation to complete a questionnaire concerning the proposal to introduce selective licensing for privately rented properties.</p> <p>I own my parents' house in xxxx from where I went to school but after my parents' deaths my sister and I now let the property through Brookdale Property Management.</p> <p>I have completed the questionnaire but it doesn't look like a questionnaire that asks for landlords' opinions it looks like it is biased towards asking residents whether landlords should meet their obligations and whether it would improve the area. Of course all residents are going to say yes giving the council carte blanche to start charging £600 per rented property. That would be a nice windfall for the council.</p> <p>The questionnaire has no area where I can give my full opinion,</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>The licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' association such as the National Landlords' Association or the Residential Landlords' Association, to have their properties managed by an agency accredited by the Association of Residential Letting Agents - in which we are in liaison with along with.</p> <p>If you or your agent has appropriate accreditation, then the fee for the five year period is £50 per property. If there is no accreditation, the fee is proposed at £600. With this structure, the city council has tried to favour good landlords like yourself.</p>	18.12.2015

<p>it is only a multiple choice form.</p> <p>I am not a member of a landlord's association. I don't know anybody who is and don't see the point. I own 2 properties in Wellingborough as well and for all 3 properties I use reputable letting agents. It is either a legal requirement or good practice to adhere to all of the conditions attached to the proposed licence.</p> <p>A gas safety certificate must be obtained annually and produced to the council (if there is a gas supply to the house)</p> <ul style="list-style-type: none"> • Electrical appliances and furniture supplied by the landlord must be kept in a safe condition • Smoke alarms must be installed in the house and should be well maintained • The licence holder must supply the occupiers with a tenancy agreement • The licence holder must demand references from prospective tenants <p>Any reputable letting agent and certainly the ones I use make it compulsory to meet these conditions already along with the new CO2 detector regulations and even legionnaires disease checks combined with the annual gas safety check and any other requirements that are introduced. They will not allow overcrowding and are the point of contact for any complaints by the tenants or even about the tenants that would be dealt with either by the letting agent or the landlord.</p> <p>I can see that selective licensing would be a good thing to either weed out or force compliance on rogue landlords but for those of us who use a good letting agent and therefore automatically meet our responsibilities then a £600 licence would be charging money for nothing. That might be a benefit for the council but it would be very unfair on your good</p>	<p>Thank you once again for your email. All feedback is important as part of our consultation.</p> <p>Kind regards Selective Licensing Project Team</p>	
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	<p>landlords.</p> <p>When looking for tenants I constantly refused offers to let the house to companies who wanted to make it a HMO, primarily because this was our family home and we know and like our neighbours so gave instructions that we would only consider letting it to a family but also due to the cost of an HMO licence. The proposed fee for a HMO is only £150 more than for a single let. HMOs appear to be much easier to find tenants for and generate a higher rent so the small difference between licence fees could increase the number of shared houses in the area instead of family homes. This would naturally make an area less desirable.</p> <p>Additionally the introduction of an expensive licence could drive up the rent of houses in these area or worse deter landlords from letting houses in these areas which would mean a reduction in available affordable housing, a reduction in house prices in the area and therefore the start of decay in an area with cheap but poorly maintained privately owned properties and HMOs.</p> <p>In summary I think selective licensing could be beneficial where landlords do not use a letting agent and do not meet the basic conditions above.</p> <p>Selective licensing should not apply to landlords who let through a reputable letting agent where legal requirements and good practices are already met.</p>		
18/11/20 15	<p>Dear Peterborough City Council</p> <p>Thank you for your letter of November 2015 regarding Selective Licensing.</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure</p>	18.12.2015

<p>I am a perfectly decent landlord of a tidy 2-bedroom flat in xxxx</p> <p>The flat is rented through a reputable local agent to one tenant. The tenancy agreement requires the tenant to keep the place clean and tidy and not to make a nuisance of himself. The neighbours have my agent's contact details if there is any problem. The flat is inspected quarterly and maintained as required.</p> <p>I am a perfectly decent landlord.</p> <p>Decent landlords already subscribe to and implement the values outlined in your Selective Licensing proposal. After all, these are already requirements of law.</p> <p>There may be a group of 'rogue' landlords who do not subscribe to those values outlined in the licensing proposal or the requirements of law.</p> <p>I do not agree that rogue landlords are the direct cause of the following problems observed in your proposal:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Antisocial behaviour, <input type="checkbox"/> Crime, <input type="checkbox"/> Poor and dangerous property condition, <input type="checkbox"/> Overcrowding, <input type="checkbox"/> More waste, <input type="checkbox"/> The poor health of occupants. <p>I do not agree that I should be selected, by virtue of my status as a private landlord, to pay an additional sum of money for enforcing existing or new law. I can state with relative</p>	<p>the city council has tried to favour good landlords like yourself. The structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>We do not think that a £50 fee is unduly onerous to a good landlord over a five year period and will not impact – on its own – on the investment decision.</p> <p>We recognise that anti-social behaviour in itself is often nothing to do with the landlord.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Thank you once again for your email – all feedback is an important process as part of the consultation.</p> <p>Kind regards Sent on behalf the Selective Licensing Project Team</p>	
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confidence that, in my capacity as landlord, I have not caused any:

- Antisocial behaviour,
- Crime,
- Poor and dangerous property condition,
- Overcrowding,
- More waste,
- The poor health of occupants.

I do agree, where such problems are identified and they are in breach of law, then enforcement should follow through some appropriate local authority.

I do not agree that funding law enforcement should be limited to private landlords. Surely the same obligations fall upon council, housing association and corporate landlords too. Why stop at landlords. Tenants have obligations too. And so do agents. In fact, we all have obligations to uphold the law.

Without selection, preference or discrimination; everyone pays for law enforcement through local and national taxation.

Selecting me and tenuously blaming me for Peterborough's problems in order to extort additional funding for law enforcement amounts to discrimination.

There seems to be some inability or failure on the part of local authorities to enforce the current requirements of law in relation to rogue landlords.

<p>Due to the failure of the existing enforcement regime, your proposal demands decent landlords fund a new enforcement regime.</p> <p>In the case of decent landlords, it is misleading to assert that your new enforcement regime shall lead to the following benefits:</p> <ul style="list-style-type: none"> ☐ A higher standard of management, ☐ Better housing, ☐ An improved image and perception of the area, ☐ Greater ability of landlords to deal with rogue tenants, ☐ A reduction in crime and anti-social behaviour, ☐ Better waste management, ☐ More settled communities, ☐ A mixed and vibrant community that people enjoy living in. <p>In as much as they can be understood, none of these follow directly from your Selective Licensing proposal.</p> <p>Your proposal penalises decent landlords, offering them no benefit in return for their funding.</p> <p>Your proposal reduces the capacity of rogue landlords to improve.</p> <p>Your proposal offers no guarantees that enforcement shall be any more rigorous than before.</p> <p>In a single sentence (albeit a long one), your proposals expect decent landlords to pay for the past failings of local authorities</p>		
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	<p>in enforcing existing law upon a minority of rogues in return for no benefit nor any guarantee of improvements in enforcement.</p> <p>Your problem is enforcing current law upon a few rogues. When you cannot cope even with this, I do not understand how you would cope applying yet more law against even more people.</p> <p>I admire your motives. However:</p> <ul style="list-style-type: none"> ☒ You offer no evidence that landlords are the direct cause the problems above, ☒ You offer no evidence that your Selective Licensing scheme improves the enforcement of law, ☒ And, uppermost in my mind, why should I be selected pay extra to fund the enforcement of existing law? I've not done anything wrong. <p>(Rant over.)</p> <p>Yours sincerely</p>		
19/11/20 15	<p>Dear Sirs</p> <p>I write in connection with the proposal for selective licensing within some areas of Peterborough.</p> <p>Whilst I do agree there are certainly some issues in respect of anti-social behaviour, too many off licences and fly-tipping in some of the areas highlighted for the scheme, I do not feel the selective licensing is a fair solution to the problems at hand.</p> <p>I personally own some properties within these areas and do my utmost to ensure they are clean, not overcrowded and regularly inspected and checked by professionals to ensure</p>	<p>Dear xxxx</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p>	18.12.2015

	<p>they are safe. I also have many clients within the city who also have properties within these areas and they also very professional.</p> <p>I understand there are some "rogue" landlords and the majority of the issues being raised are a direct result of their properties. However, I do not agree that decent compliant landlords should pay for the council to be able to carry out its function of finding these rogue landlords and penalising them. Why is the issue an issue for decent landlords anymore than others affected by the issues above. I also feel that the only landlords who would register with the council for selective licensing would only be the decent compliant landlords in any case and would not bring the council any closer to finding the "rogue" landlords.</p> <p>The issue needs to be dealt with by a more targeted approach by the council working closing with the PCSO's to indentify the properties and fine the landlords heavily enough to a) deter them from non compliant properties/tenants and b) pay for the cost of the compliance activities.</p> <p>We all feel the council is now looking to benefit financially from a situation which it needs to deal with as part of its function. We do not agree with the proposals and the councils attempt to effectively introduce a further tax for landlords.</p>	<p>If you or your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords like yourself, and as mentioned this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>We do not think that a £50 fee is unduly onerous to a good landlord over a five year period and will not impact – on its own – on the investment decision.</p> <p>Selective Licensing brings together different aspects of legislation (some enforced by different agencies such as the Health and Safety Executive and Gas Safety) and enables PCC to proactively ensure all privately rented housing meets the legal requirements that all private rented property is of the same housing standard. At present the council must wait for a problem (like a gas explosion!) before it can act in relation to some of the legislations.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Thank you once again for your email – all feedback is an important process as part of the consultation.</p> <p>Kind regards Sent on behalf the Selective Licensing Project Team</p>	
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19/11/20 15	<p>Thank you for your response.</p> <p>The Chapter of Peterborough Cathedral is indeed the landlord for most (but not quite all) of these properties. As we are already fulfilling all our obligations as landlords (and are aware of the legislation that is already in place to deal with non-compliance) perhaps you could explain what we will gain from paying even £50 per property (plus the additional costs of joining an association)? We have no anti-social caused by tenants on this site, and we are not clear how charging good landlords to deal with rogue landlords is likely to work in practice.</p> <p>We will of course have to factor any additional costs into our tenants' rent, particularly as we have charitable status and much of our accommodation is clergy and staff housing.</p> <p>If the legislation is already in place and you have landlords in these areas who are not compliant, then this needs to be tackled. If rogue landlords are not willing to comply with existing standards of property management, neither are they are likely to comply with new licensing obligations.</p> <p>Could you forward to us the data upon which the proposal to include Minster Precincts in the Selective Licensing area has been based. I do not believe this is available on the website.</p>	<p>ATHENE TO CHECK LSOA's Boundaries</p> <p>Athene in process of setting up meeting to discuss further. Date tbc tentative Wed 3rd Feb</p>	
19/11/20 15	<p>As a Private Landlord I pride myself on having good property to Let. My belief is that good property (generally) attracts good tenants. I let through a bona fide agent – xxxx who do regular checks on the tenants and notify me of any issues during the tenancy</p>	<p>Dear Mr xxxx</p> <p>Thank you for email.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which</p>	18.12.2015

	<p>The concept you are proposing might sound fine in principle but in reality will only drive 'Bad Landlords' underground. You will therefore only be Licensing good landlords – who will once again bear the brunt of the costs and legislation. How will you find landlords who have not registered and let privately? You simply do not have the resources to police this</p> <p>Either the private landlord has a role in society or he does not. If yes then in recent years he has had to deal with an increasing amount of legislation to keep property up to spec - electricity, legionnaires, Deposit Scheme being 3 that spring to mind. Show me any Landlord who has been to an arbitration dispute with a tenant and won – it just doesn't happen – but we are not xxx but people who want a fair return for the job. Now the Chancellor is taking away mortgage relief and you are mooting yet another charge. Soon mortgages will rise and there will simply be nothing left in the job.</p> <p>These are all factors that will lead to the decline of private landlords in the system; is that what you wish for? BEWARE!</p>	<p>does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>The legislation prohibits Selective Licensing scheme from making a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>If you as your agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure, the city council has tried to favour good landlords like yourself.</p> <p>Thank you once again for your feedback – all of which is important as part of the public consultation.</p> <p>Kind regards Sent on behalf of the Selective Licensing Project Team</p>	
19/11/2015	<p>Are you saying all landlords in these identified areas are unscrupulous? I am sure there are many who are not just in these areas. Especially in relation to overcrowding. In these specific areas especially with overcrowding. Maybe you should actually inspect properties that can easily be identified as substandard without spending money on more red tape and bureaucracy which to me will not solve the problem as the unscrupulous landlords will just continue to defy the law. Landlords will pass on the cost to tenants making renting even more costly. Surely there are powers that can be used to deter landlords from being unscrupulous now. You are obviously</p>	<p>Dear xxx</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such</p>	18.12.2015

	<p>aware there are many tenants living in poor conditions so why can't you deal with these now. You don't need this registration scheme in my opinion. It's just a costly ill thought through idea that isn't needed but no doubt will go ahead despite objections. The type of tenants living in these conditions are hardly likely to be able to go into rented accommodation with accredited landlords because there is a shortage of housing and they will be forced to live in these substandard conditions because there is nowhere else for them to go.</p> <p>Why can't the council focus and deal with these landlords now. They don't have to look very far to find them!!!</p>	<p>as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>Thank you once again for your email – all comments are important as part of the public consultation.</p> <p>Kind regards Sent on behalf of the Selective Licensing Project Team</p>	
19/11/2015	<p>Thank you for taking the time to reply.</p> <p>I would say that I do employ the services of an agent so all checks are carried out as required by law. Whether they are accredited is another thing, I don't know if they are and to be honest I'm not that bothered as they provide me with excellent service, better than an agent I used previously who actually was a member of NALS I believe.., but from what you say if they are not you assume they are no good and want to charge £450 more for that? I think that's pretty outrageous.</p> <p>I also own a letting company in Milton Keynes, I'm not accredited I don't want to be, why? Because they charge a lot for basically doing nothing. Does that mean im a bad agent, no it doesn't.</p> <p>Like I said in my initial correspondence, PCC already have to powers to control the rogue landlords and properties. Also by</p>	<p>Thank you once again for your email – all comments are important as part of the public consultation.</p> <p>The consultation will end on 14th January 2016. A report, including that from the public consultation will be submitted to The Secretary of State, whom will make the decision.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	18.12.15

	<p>implementing selective licensing you are basically saying that the area isn't good, which in turn will have an adverse effect on insurance premiums and house prices.</p> <p>I'm afraid you won't convince me that it's a good idea, apart from HMO's which I have strong views on anyway. It has failed all over the country, is a waste of time and money when, and I'll say it once more, you already have the powers to sort out the rogue landlords and properties.</p> <p>Apologies if I come across a bit blunt but everyone is anti-landlord at the moment and I think we will soon see a big change with some landlords bowing out which ultimately will lead to less private rented properties about.</p> <p>Anyway, the choice is down to PCC, my decision has already been made should you go ahead with it.</p>		
20/11/15	<p>Thank you for your answer to my comments.</p> <p>I went to the consultation meeting yesterday which I found most interesting. I felt rather sorry for the representatives of Peterborough City Council since many of the irate landlords there were airing grievances that had little to do with selective licensing. However, I did support the general view that the good landlords appeared to be carrying the can for the poor landlords.</p> <p>I have re-read the questionnaire in the light of your advice. I can see where there is scope for the views of the landlords, but the way that the questions are phrased does not easily suggest this.</p>	<p>Thank you once again for your email – all comments are important as part of the public consultation.</p> <p>The consultation will end on 14th January 2016. A report, including that from the public consultation will be submitted to The Secretary of State, whom will make the decision.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	18.12.2015

	<p>I'll have another go.</p> <p>I note your advice about accreditation. The references in the handout and the comments of the PCC personel at the meeting were rather contradictory. Advice that landlords who have an accredited letting agent pay a lower licence fee v the landlord needs to be accredited. The team need to ensure that they are all singing from the same hymnsheet.</p>		
20/11/15	<p>Thank you - however I fail to understand why any government legislation would allow you to discriminate against some tenants.</p> <p>They all deserve the same support and protection.</p> <p>May I also mention, if you do not know a persons title you should not assume what it is.</p> <p>Lord, Lady, Dr, Rev. To name a few</p>	NO RESPONSE REQUIRED	
24/11/15	<p>Neither do I.....!!!</p> <p>☹️On 23 Nov 2015, at 09:59, xxxx> wrote:</p> <p>I dont understand your response</p> <p>Regards xxxx</p> <p>On 22 Nov 2015, at 17:55, xxxx> wrote:</p> <p>Yep, I know.</p> <p>But it was such a bloody good article and it may stimulate some brain cells out there??!!</p>	NO RESPONSE REQUIRED	

	<p>On 21 Nov 2015, at 12:06, xxxx> wrote:</p> <p>Yes i did say In a previous mail i sent last month about the draft for November focus that Dogsthorpe is not in the area</p> <p>On 21 Nov 2015, at 11:10, xxxx> wrote: Thank you kindly. Appreciated.</p> <p>xxxx On 19 Nov 2015, at 09:41, selectivelicensing <selectivelicensing@peterborough.gov.uk> wrote:</p> <p>xxxx Under the Housing Act 2004 the first threshold that must be applied before an area can be considered for Selective Licensing is that more than 19% of the housing stock must be in the private rented sector. The average for Dogsthorpe is just over 11% and therefore it cannot be considered. Sent on behalf of Selective Licensing Project Team</p>		
24/11/15	<p>I attended a session at the Fleet last week as regards Selective Licensing. I had a few questions that your representatives could not answer, they advised I should email this address instead.</p> <ol style="list-style-type: none"> 1) Reduced fee of £50 if member of association etc – can you confirm if this applies for Single Lets & HMOs? 2) Your definition of an HMO on the display material:- “£750 for a house in Multiple occupation. This is a house let to 3 or more persons forming 2 or more households. Note that HMOs already require a licence” 	<p>Dear Ms xxxx</p> <p>Thank you for your email.</p> <p>Below is some factually correct information regarding HMO’s for your information:</p> <ul style="list-style-type: none"> • An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet. • A house which has been converted entirely into bedsits or other non-self-contained accommodation and which is let 	18.12.2015

	<p>I believe that to be factually incorrect, only houses with 5 or more occupants and 3 storeys currently need an HMO license. Please confirm what the definition of an HMO will be under the new scheme and for example, how a house let to 4 separate individuals will be treated?</p> <p>3) Is there any provision for a pro-rata arrangement, ie, if a house is purchased and rented out midway through the scheme's life, is the full fee or a pro-rate rate applicable? Similarly, are refunds available if a house is sold during the scheme's operation?</p> <p>Please advise so that I can prepare my detailed response for submission/consideration.</p> <p>Regards</p> <p>xxxx</p>	<p>to 3 or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities.</p> <ul style="list-style-type: none"> • A converted house which contains one or more flats which are not wholly self-contained (ie the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by 3 or more tenants who form two or more households. • A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies. • In order to be an HMO the property must be used as the tenants' only or main residence and it should be used solely or mainly to house tenants. Properties let to students and migrant workers will be treated as their only or main residence and the same will apply to properties which are used as domestic refuges. <p>With regards to your question with regards to whether there is a pro-rata arrangement - at present the scheme propose for landlords to pay the full fee. The legislation provides very limited circumstances in which a refund is given and the sale of the property is not within those circumstances.</p> <p>Thank you once again for your email.</p> <p>Sent on behalf of the Selective Licensing Project Team</p>	
24/11/15	<p>Dear Mr Chapman,</p> <p>I have completed your survey, but found that it did not address my concerns nor did it ask the questions I was interested in answering. I am not quite sure whether the survey was for tenants or landlords as we do not live in the areas where our rental properties are. Have you attempted to answer the questions?</p>	<p>Dear xxxx</p> <p>Thank you for your email.</p> <p>We recognise that anti-social behaviour in itself is often nothing to do with the landlord.</p>	18.12.2015

	<p>I wish to put some points to you:</p> <ol style="list-style-type: none"> 1. Why should landlords who, like ourselves, employ Agents to manage the property in accordance with legislation, be penalised by 'rogue' landlords. We have several properties in the town which we let through estate agents who charge a hefty fee for their work. Their obligations are not only to ourselves to collect the rent, but to see that the property is in a fit and safe condition to be let. 2. None of our properties is in a poor or dangerous condition. 3. We do not contribute to overcrowding or poor quality housing. We object to being 'lumped' in with a description of 'rogue' landlords, when in fact we are able to offer good quality housing at a fair rent. This is a service to those people who need to rent properties. 4. We do not know how such a scheme will improve the management of our properties when they are already being managed for us. Perhaps you should consider licensing the estate agents themselves and ensuring that they are carrying out their obligations. 5. If this scheme goes ahead, and there is a cost, it will be the tenants who suffer when landlords are obliged to raise their rents. <p>I look forward to your comments, xxxx</p>	<p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>Thank you once again for your email – all comments are important as part of the public consultation.</p> <p>Kind regards Sent on behalf of the Selective Licensing Project Team</p>	
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24/11/15	<p>Dear Adrian,</p> <p>I understand that public exhibitions are being held for the above proposed scheme at various locations but not one in the Central Ward.</p> <p>I would kindly request that one exhibitions would be held in a venue at Central Ward.</p> <p>Could you kindly advise?</p> <p>Regards</p>	<p>Dear xxxx</p> <p>Thank you for email.</p> <p>As you may well be aware, we held an exhibition at Centre 68 that falls within Central Ward. We have however, taken on board your recent request and are currently looking into various locations and dates for holding an additional exhibition. This will be publicised in due course on the website and various locations should this go ahead.</p> <p>Kind regards Sent on behalf of Selective Licensing project team</p>	18.12.15
27/11/15	<p>I have read your proposals and as a landlord who would be affected by them I feel I need to comment.</p> <p>Overall, I feel this is a bureaucratic and badly timed proposal with unjustifiable fee levels. It is quite likely that the aims of the proposals will not actually be met and that there is a very real danger of driving up the costs of renting properties in Peterborough. As responsible people you should have already considered the points I am raising so if you do proceed with the proposals as stated I can only surmise that the whole process is really only designed to raise revenues not protect tenants.</p> <p>My points are: Firstly, I agree that not all landlords offer properties that meet current requirements but a very large number do this and you will be penalising the good landlords, who are likely to adhere to any new proposals, for the minority who do not do so now and will no doubt find ways of not doing so in the future.</p>	<p>Dear xxxx</p> <p>Thank you for your email.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords’ organisation (such as the National Landlords’ Association or the Residential Landlords’ Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p>	18.12.2015

	<p>(Why not allow tenants who have a genuine reason for complaint to contact you so you can carry out surprise spot checks. This would no doubt be a better use go your resources anyway.)</p> <p>The level of suggested fee is so high, this will be in excess of one month's rent for many landlords, that I believe many will simply give up renting and sell their properties. The latest Stamp Duty and Tax Relief changes announced by the Government are unlikely to encourage more buy to let landlords, quite the opposite. So this will also inevitably reduce the supply of such properties and the laws of demand and supply is likely to see rents increase. Your proposed fees will mean that landlords will have to pass on any new costs to the tenants thus increasing rents.</p> <p>Thus it is quite likely that Peterborough will experience a "double whammy" of reduced numbers of rental properties available at increased cost. This is not sensible or desirable so your proposals need to be rethought.</p> <p>I look forward to receiving any responses you may wish to make.</p>	<p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>Thank you once again for your email – all comments are important as part of the public consultation.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	
27/11/15	<p>Dear Sir/Madam</p> <p>I am owner of the xxxx and it's rented out through the agency at the moment. I got letter yesterday from Peterborough City Council about selective licensing. I don't have any idea what to do, how to start, where I have to go and how to apply selective licence. I checked online on www.peterborough.gov.uk/SelectiveLicensing but was so confusing so it would be much appreciate if you can guide me</p>	<p>Dear xxx Thank you for your email. The proposed Selective Licensing scheme is at public consultation stage, where we are obtaining feedback from the public on the proposals – the closing date is 14th January.</p> <p>Should The Secretary of State wish to put the scheme into place, relevant details on how to apply for a licence, should one be required, will be place on Peterborough City Council's website.</p>	18.12.2015

	<p>in right direction. Thank you very much in advance for your help.</p> <p>Kind Regards</p>	<p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	
27/11/15	<p>Dear sirs,</p> <p>I did attend the recent meeting at the Fleet, and before I say what my experience was of that. I would like to point out that I fully commend the aims of the scheme. I have no problem with it except for the way you have divided up the areas of the city. It should be the whole city as and when time and money allows, but start from either the middle or a side and work your way through. There is no way (and yes I have studied your data) that Stanground is more of a problem than even the 2 areas you have left alone, ie, the Ortons and Paston. As to the meeting, what a farce that was. Two men sitting at a table being harangued by a gaggle of landlords, the one interjection I managed to make was very rudely answered by the man at the side of the council chap. The whole rest of the meeting was just anyone and everyone talking at your council bloke with no set time or order, and my fears as to the schemes outcome were confirmed when I was buttonholed by a lady with a clipboard folder who gave the impression that she worked on the team, and it wasn't till she put her folder on the desk and asked me if I was a landlord or an owner and had any plans to rent out a property that I noticed it had BELVOIR on it and I asked her if she worked for the council and she said no, she worked for Belvoir and scurried off. It seemed like the buzzards are circling already by letting agents attending these meetings and giving false impressions, although she never said directly she worked for the council, I think any letting agents who attend these meetings should be required to wear a nametag with the firm that they work for if they are going to try and drum up business. yours xxxx</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>In the 2014 guidance note "Review of Property Conditions in the Private Sector", DCLG states that, "The Government does not support the use of licensing across an entire local authority area". It adds, "Such an approach is disproportionate and unfairly penalises good landlords". Any Licensing scheme should therefore be, as the name suggests, selective. It should identify those areas where there is greatest need using the six criteria listed in the changes to the 2004 Housing act in April 2015. These are: Crime, deprivation, anti-social behaviour, poor housing conditions, migration, and low housing demand.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p>	18.12.2015

		<p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none"> Poor property condition Inward migration Crime Anti-social behaviour Deprivation Low housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only.</p> <p>Thank you for your email – all feedback is important as part of the consultation process.</p> <p>Kind regards Sent on behalf of the Selective Licensing Project Team</p>	
27/11/15	<p>Dear xxxx,</p> <p>You recently sent me a letter regarding selective licensing.</p> <p>I am the owner of xxxx, which is my former home. I am now married and living at xxxx</p> <p>I am selling xxxx. It is undergoing some minor repairs currently and I am finishing off emptying it before putting it up for sale. I have no intention of becoming a landlord and I have never been a landlord. Please adjust your records accordingly.</p> <p>Thank you.</p> <p>Yours sincerely,</p>	<p>No need for a response. Database to be updated by PCC</p>	

27/11/15	<p>Dear Sirs</p> <p>With reference to your recent correspondence regarding Selective Licensing, we wish to make you aware that we no longer own or rent out properties.</p> <p>We are in the process of closing our company due to retirement.</p>	<p>No need for a response.</p> <p>Database to be updated by PCC</p>	
27/11/15	<p>Hello,</p> <p>Can you tell me if the 2 properties we are about to buy to let out need to be Licenced.</p> <p>xxxxx</p> <p>Many Thanks</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>The two properties that you have mentioned, are not at this stage included within the Selected Licensing Scheme.</p> <p>Kind regards</p> <p>Sent on behalf of the Selective Licensing Project Team</p>	18.12.2015
30/11/15	<p>Dear Mr xxxx,</p> <p><u>Selective Licensing</u></p> <p>Thank you for your letter dated November 2015 which followed up an earlier letter dated 19 October 2013 which dealt with the same issues.</p>	<p>Dear Mr xxxx</p> <p>Many thanks for your email responding to the Selective Licensing proposals.</p> <p>Turning to the questions you've raised we would respond as follows:</p> <ol style="list-style-type: none"> 1. "Selective" refers to the areas within Peterborough that are proposed to come under the licensing regime. Government guidance precludes a city-wide approach 	

I have already 'free-posted' the completed CONSULTATION QUESTIONNAIRE and I now attach a copy of my email dated 23 October 2013 14:52 together with the previous completed consultation form – my views remain unchanged.

2. Areas of low housing demand was the original criterion for selective licensing included in the Housing Act 2004 but it is only one of many. It was originally set up to address areas where there were whole streets of vacant property damaging the viability of urban areas. It is included now to reflect those areas where the average sale price is statistically lower than average, indicating lower than average demand. Peterborough does not seek to rely upon one issue alone and indeed is only proposing to introduce a scheme where at least 5 or all 6 of the criteria are met.
3. Anti-Social Behaviour is one of the main criteria that the Housing Act allows for Selective Licensing. Selective Licensing will aim to encourage more landlords to use formal tenancy documents and thus be more aware of the action they can take when tenants do not behave according to the terms of the agreement. It will also raise awareness amongst tenants of the implications of Anti-Social Behaviour
4. Op Can Do is the name given to the 10 year long a partnership launched in 2011 between city council, police, fire service, health, voluntary and community organisations. The scheme proposes a series of measures designed to address issues of crime, poverty and fly-tipping; while promoting community spirit and turning the area into the cosmopolitan centre of the city. Long-term plans included a council review of licensing policies in a bid to reduce the number of off-licences. Selective Licensing will work in tandem with this initiative.
5. By identifying who the "good" landlords are, Selective Licensing allows a far more effective targeting of those who are not licensed and are therefore more likely to

		<p>be offering sub-standard or dangerous accommodation.</p> <ol style="list-style-type: none">6. "Selective" applies to the areas defined, not the landlords7. If the landlord is a member of (and accredited by) a suitable national organisation like the National Landlords' Association or the Residential Landlords' Association, or if the managing agent is a member of a suitable organisation (NALS, ARLA), then the fee is significantly discounted to £50 per property over the whole five year period. This membership and accreditation route is an easy and visible way of demonstrating that the property will be managed to an acceptable standard.8. As mentioned in point 7 licensing will require landlords to be accredited by national organisations or use agents that are registered with suitable national organisations <p>The proposed policy is governed by strict financial criteria set down by Government. The licence fee cannot legally be used for more than the scheme's administration so it cannot be diverted to other parts of the council. The fee is heavily discounted in favour of those landlords that are members of recognised organisations or who use managing agents that are.</p> <p>By increasing the use of tenant references and formal tenancy agreements the scheme is designed to help "root out" rogue tenants as well as landlords, and the complementary schemes that will introduce public space protection orders and limit the number of licensed premises should also support that aim.</p>	
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		<p>Where the council is a landlord it will indeed be subject to the same proposals.</p> <p>Can I thank you for responding to the consultation and I can assure you that your letter, my response and your completed questionnaire will form part of the finalised consultation process.</p> <p>Yours sincerely</p>	
01/12/15	<p>Dear Mr xxxx</p> <p>Please find attached a response to your letter of 23 October 2015 about the City Council's consultation on selective licensing.</p> <p>Yours sincerely</p>	<p>NEED TO REFER TO LETTER</p> <p>xxxx Service Director: Adult Services and Communities Peterborough City Council</p> <p>selectivelicensing@peterborough.gov.uk</p> <p>Dear xxxx</p> <p>Subject: Consultation on Selective Licensing</p> <p>Thank you for your letter dated 23 October 2015 addressed to xxxx. I apologise for the delay in replying to you.</p> <p>The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or programmes unless they raise a clear or significant equality or human rights concern.</p> <p>Local councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on</p>	No further response required.

		<p>people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is an on-going legal obligation and the mechanism through which public authorities involved in planning and development processes should consider the potential for their proposals to have an impact on equality for different groups of people.</p> <p>To assist, you will find our technical guidance here</p> <p>Yours sincerely</p>	
09/12/15	<p>(Requests a call back)</p> <p>Hi</p> <p>Regulatory organisation, National Approved Letting Scheme(Chief Executive)</p> <p>Recognition of this organisation in the private sector.</p> <p>xxxx</p>	<p>ATHENE Returned call</p>	
09/12/15	<p>Hi,</p> <p>I attended the consultation in Bretton recently and was asked to email with my additional comments.</p> <p>I rent out a number of unfurnished properties in Peterborough and the surrounding areas and use an established letting agency in Peterborough to advertise and obtain suitable vetted tenant(s). I then manage the properties myself and deal with any concerns raised and ensure the properties are inspected every 3 months. We respond proactively to issues raised by tenants or observed by us during our regular inspections.</p>	<p>Dear xxx</p> <p>Thank you for your email and coming along to the public exhibition in Bretton.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain</p>	18.12.2015

<p>I have a number of reliable contractors (plumbing, electrical, fencing etc.) who undertake gas safety checks, plumbing and electrical work and maintenance as required.</p> <p>I am not happy with the proposal to introduce selective licensing. It will increase landlord costs and goes beyond the national letting requirement. I set a high standard for my properties and e.g. exceed the national standards by having an electrical survey on purchase on the property.</p> <p>Tenants are given our mobile numbers and we encourage them to give us theirs as well.</p> <p>We are opposed to joining an external organisation just to evidence our standards and resent the high price the council intends to charge non-members. We should be able to self-certify.</p> <p>Ultimately, any landlord costs are likely to be passed on to the tenants or drive high quality landlords out of the market. House prices could be affected in areas where selective licensing exists as it is considered to indicate a less desirable area.</p> <p>I think Peterborough city council should reconsider the areas and streets included and remove more modern properties (in better state of repair and less likely to be poorly done conversions). Not all streets should be covered even if the general area has concerns.</p> <p>Better to test the plan in the known problem streets first.</p> <p>Thank you.</p>	<p>accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none"> Poor property condition Inward migration Crime Anti-social behaviour Deprivation Low housing demand 	
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		<p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only.</p> <p>Thank you for your email – all feedback is important as part of the consultation process.</p> <p>Kind regards</p> <p>Sent on behalf of Selective Licensing Project Team</p>	
09/12/15	<p>Dear Sirs</p> <p>My wife and I own and rent out a single bedroom house in xxxx</p> <p>We have read the consultation form and do not find it is suitable for making the argument for:-</p> <p>1) The council not establishing a selective licensing scheme</p> <p>and if the scheme goes ahead</p> <p>2) A modification to the area In Parnwell so that the group of houses that ours is in is not included in the selected area.</p>	<p>Dear xxxx</p> <p>Thank you for your email.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords,</p>	18.12.2015

	<p>Could you tell us if we can set out our case in correspondence on this e-mail address or should we send it in hard copy. Also is there a preferred format you would like us to use so that our case can be easily incorporated into your consultation analysis and report.</p>	<p>this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none">Poor property conditionInward migrationCrimeAnti-social behaviourDeprivationLow housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only.</p> <p>If you have any further feedback, please do send via this email address. All feedback is important as part of the consultation process.</p>	
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		Kind regards Sent on behalf of Selective Licensing Project Team	
09/12/15	<p>As a landlord in Peterborough I am very disappointed with the above scheme. We have long term tenants in all our properties and they recommend us to their friends to rent our houses. We will be penalised because of some unruly landlords.</p> <p>We have the following points:</p> <p>The difference in your charges for a HMO and a family house home do not add up. HMO's get approximately at least £2000 a month, a family home £500-£600. This percentage difference in price should be taken into account with your charges.</p> <p>We cannot see how your plan will deal with anti social behaviour with tenants.</p> <p>Why don't you have a scheme that will reimburse the charges back to the landlords if everything is ok, that way you just charge the poorly ran accommodation.</p> <p>Landlords will only pass the charges onto the tenants, we have to make a living.</p>	<p>Dear xxxx</p> <p>Thank you for email.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private</p>	18.12.2015

		<p>rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none">Poor property conditionInward migrationCrimeAnti-social behaviourDeprivationLow housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only.</p> <p>Below is some factually correct information regarding HMO's for your information:</p> <ul style="list-style-type: none">• An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet.• A house which has been converted entirely into bedsits or other non-self-contained accommodation and which is let to 3 or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities.• A converted house which contains one or more flats which are not wholly self-contained (ie the flat does not	
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		<p>contain within it a kitchen, bathroom and toilet) and which is occupied by 3 or more tenants who form two or more households.</p> <ul style="list-style-type: none"> • A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies. • In order to be an HMO the property must be used as the tenants' only or main residence and it should be used solely or mainly to house tenants. Properties let to students and migrant workers will be treated as their only or main residence and the same will apply to properties which are used as domestic refuges. <p>Thank you once again for your email.</p> <p>Kind regards Sent on behalf of Selective Project Team</p>	
09/12/15	<p>Hi all,</p> <p>I am a private landlord, I am not in favour with the plans as I feel that the costs would only cause rents to rise, and there would be so much red tape. I can't believe that you are not considering letting agencies, where there are lots of properties being managed by them. They already look after their properties to a high standard, so this would create an extra burden to them.</p> <p>I don't believe that the benefits outweighs the cost of catching the few landlords that do not look after their properties.</p> <p>I do not get much money left each month, after I have paid the ground rent, management fees, mortgage, the letting agency fees to save for maintenance costs. If the mortgage rates</p>	<p>Dear Miss xxxx</p> <p>Thank you for your email.</p> <p>Just to confirm that Welland is not part of the proposed area for the Selective Licensing scheme.</p> <p>All feedback is an important part of the public consultation which ends on 14th January. As a result all feedback will be concluded in a report which will accompany various additional documents that will be submitted to the Secretary of State, who will then decide if the scheme will be put into place.</p> <p>Kind regards Sent on behalf of the Selective Licensing Project Team</p>	18.12.2015

	<p>increase, then I would be running at a loss, and unable to sell as the property it is in negative equity, which I don't think selective licensing would increase property values. Last year a had several months where the tenant at the time was not paying rent, and therefore I went into debt, whilst I had to legally evict them, and get the property ready to rent to new tenants, and so wiped out all my savings. Therefore I am only now just managing to save £40 a month, to help cover any maintenance costs which might occur in the future. Therefore I am unable to pay the fee in full, which I am sure that I am not the only one, so as a suggestion could the fee be paid in instalments, like the council tax.</p> <p>This all feels like punishing the good landlords instead of the bad ones, as the bad ones will not be paying so the good ones will be bearing of the costs.</p> <p>Xxxx Secretary Welland Residents Association</p>		
09/12/15	<p>Thank you kindly.</p> <p>Pity really as some privately rented properties locally leave a lot to be desired!!</p> <p>Best wishes</p> <p>xxxx</p>	NO response required.	
10/12/15	<p>I need some clarity please. I do not rent my properties privately. I am on the framework agreement with Peterborough City Council's Children Services to provide Supported Accommodation for Looked After Young Persons. Access To Resources decided in which house to place these young persons who only stay on a short time basis until they move on at the age of 18 years. We are closely regulated and</p>	<p>Dear Mr xxxx</p> <p>Having looked at the list of properties provided I can see that some of them fell under the HMO registration scheme that ran until 2009. After that date, because most of them are 2 storey</p>	18.12.15

	<p>we attend the premises on a daily basis and the social workers also attend the properties on a regular basis. Our insurances for Public Liability and Professional Indemnity also requires strict adherence to Health and Safety issues. My houses are all small two and three bedroom properties and only one person is allowed per room. Tenants are normally unaccompanied minor asylum seekers. I have been conducting this business since 2005. Long time ago I had registered my properties with PCC as HMO's but was then told that it is not necessary to formally licence these premises as HMO's.</p> <p>Please advise where I fit into the big scheme of things.</p> <p>Properties: (listed) xxxxx</p>	<p>properties, they were no longer required to be licensed as they fell outside the area for the additional licensing scheme.</p> <p>However a number of you properties fall within the proposed area, namely:</p> <p>Xxxx</p> <p>Xxxx</p> <p>Xxxx</p> <p>xxxx</p> <p>There are certain criteria which, if met, would exempt your properties from the new scheme. I have attached the legislation which provides for exemptions so you are able to establish if your properties would qualify.</p> <p>SI370 Prescribed Exemptions attached to response</p>	
10/12/15	<p>The questionnaire which has been 'posted' online for completion/comment, I find totally irrelevant - as a Landlord who engages a Management Company to act on my behalf.</p> <p>I do not believe that my property meets the required number of criteria - as outlined in the City Council's proposal for selective licensing.</p> <p>A scheme to raise money which - as is so often the case - penalises honest, law abiding citizens!</p>	<p>Dear xxxx</p> <p>Thank you for your email along with the completed questionnaire.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p>	21.12.15

		<p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none">Poor property conditionInward migrationCrimeAnti-social behaviourDeprivationLow housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only.</p> <p>The legislation prohibits Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Thank you once again for your feedback.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	
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14/12/15	<p>I attended the NLA meeting on December 9th when licensing was discussed. I thought the Officers attending provided all the information they could and dealt honestly and openly with all the issues arising.</p> <p>I have completed the online consultation document, but as with any survey of this sort it doesn't fully allow responses to cover all that needs to be said.</p> <p>As a self managing couple with a handful of multi-occupied, but non-HMO licensed properties, we're broadly in favour of selective licensing if it is the only way of dealing with the issues caused by some landlords in some areas.</p> <p>It's unfortunate that good landlords have to suffer for the problems caused by bad landlords, but if the cost of £50 to cover a 5 year period per property is what is necessary then that's acceptable.</p> <p>Fees</p> <p>£900 - landlords failing to register. This is far too little a differential between the £600 or £750 rate and needs significant increase if possible. It is the only way bad landlords may take the licensing seriously.</p> <p>At the NLA meeting Officers advised that enforcement & court action could be taken, but this costs time & money.</p> <p>References</p> <p>The requirement for references is one that's not been thought through. Agents will pass reference or credit check costs onto tenants as part of the high costs they have to pay with some agencies.</p>	<p>Dear xxxx</p> <p>Thank you for your email.</p> <p>All feedback is an important part of the public consultation which ends on 14th January. As a result all feedback will be concluded in a report which will accompany various additional documents that will be submitted to the Secretary of State, who will then decide if the scheme will be put into place.</p> <p>Thank you once again for your feedback.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	18.12.2015
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Self-managing landlords check ID's, payslips and thoroughly interview prospective tenants for suitability. References can be falsified anyway and are an unreliable form of judging whether to rent a home to someone.

It's in Landlords interests to match the right HMO tenants to the right households to create harmonious homes where tenants want to stay and form a household community and so a stable area community.

How will first time tenants or those new to the UK be able to provide a reference from a former workplace or landlord from abroad and a landlord be able to check this? Even if possible the delays would be significant. I have mature students from abroad for MBA's at the college who pay independently so have no employer or former landlord. *The reference requirement is unnecessarily telling landlords how to manage their business.*

Suggestion - if the Council is insistent on some form of provable check regarding this then suitable wording should be agreed e.g. *A Landlord should undertake and document what suitable checks on tenants have been undertaken prior to agreeing a tenancy.*

Tenancy Changes

The requirement to always notify the Council when a tenancy changes is unreasonable.

The amount of work involved for a HMO landlord, especially self-managing, is unreasonable. I understand the desire to have information regarding people movements, but the load is passed to landlords. There is no clear view of how the

significant information the officers receive will be managed and the information beneficially used.

For non-HMO landlords the information can be acquired from Council Tax records with the correct requirements under the Data Protection Act registration being completed.

Language

A "common" language for documentation or communication is required under the proposals. The law governing us is English law so the language is English as the tenancy agreement will be. The government "How to Rent guide" is in English. If the tenant cannot communicate in English then most landlords would not rent to that person anyway, even if the prospective tenant brought an English-speaker with them for the Landlord interview. Having a non-English speaker in a HMO house would not work for forming a functioning household and dealing with routine matters. The vast majority of foreign nationals speak excellent English and unless they do they wouldn't be able to get employment.

This licensing requirement should be dropped.

Other

1. Although the NLA will probably oppose licensing the need to resolve problems caused by bad landlords should be resolved as soon as possible. Licensing should help do this.

If compromise is required in some areas by the council, such as those detailed above, then this should happen in the interests of progressing the approvals required to swiftly commence the scheme.

	<p>2. I've recently provided rooms to two brothers who suffered bad accommodation that was managed, or not, by one rental agency. Good landlords regularly hear stories from some tenants concerning problems elsewhere. The Council <i>must</i> heavily advertise and promote where tenants, and landlords, can report failing agencies or landlords.</p> <p>The promotion of tenants rights and where they can report problems is a major criteria for successfully resolving housing issues and improving housing stock & the community in Peterborough.</p> <p>xxxx</p>		
14/12/15	<p>Good Morning</p> <p>Please can someone contact xxxx ref questionnaire as she has some queries about the questions. She is a private landlord.</p> <p>Many thanks</p>	<p>Athene returned call 3/2/16</p> <p>xxxx content with and supportive of proposals if £50. They use xxxx in Broadway as managing agents (ARLA)</p>	
14/12/15	<p>To whom it may concern</p> <p>I represent the National Approved Letting Scheme (NALS) and we are a UK wide regulatory organisation for lettings and management agents operating in the Private Rented Sector. One our firms in the Peterborough area has brought to our attention your licensing consultation which refers to recognition of landlords who are part of the RLA or NLA and agents who are part of the Association of Residential Letting Agents (ARLA). Obviously our firm was concerned that we did not appear as a recognised body and therefore I would be grateful if you would advise what criteria we have to meet in order to gain this recognition. We are recognised under an arrangement with the GLA in London for the London Rental</p>	<p>Ed liaising direct</p>	

	<p>Standard and shortly to be recognised under the Liverpool Licensing Scheme.</p> <p>I would be grateful if someone could come back to me on this at an early opportunity.</p> <p>Thank you.</p>		
14/12/15	<p>The questionnaire which has been 'posted' online for completion/comment, I find totally irrelevant - as a Landlord who engages a Management Company to act on my behalf.</p> <p>I do not believe that my property meets the required number of criteria - as outlined in the City Council's proposal for selective licensing.</p> <p>A scheme to raise money which - as is so often the case - penalises honest, law abiding citizens!</p>	See draft above to xxxx (received on 10/12 and responded to on 21/12)	No further response required.
18/12/15	<p>Please advise whether the council have introduced Additional HMO and/or Selective Licensing in xxxx</p> <p>Regards</p>	<p>Dear xxxx</p> <p>Thank you for your email.</p> <p>I can confirm that it is not proposed to introduce Selective Licensing in this area.</p> <p>Kind regards</p> <p>Sent on behalf of the Selective Licencing Project Team</p>	Response sent 8/02/16
18/12/15	<p>Dear Sirs.</p> <p>I own and let a property on Oundle Road which would be affected by your proposals.</p>	<p>Dear Mr xxxx</p> <p>Thank you for your response as part of the Selective Licensing Consultation.</p>	Response sent 8/02/16

<p>I have just returned from 3 months travelling abroad and was therefore unable to attend your public exhibitions, which I would certainly have done had I been able to,</p> <p>Although I have completed the online questionnaire I would like to obtain further clarification from you and give my views in more detail.</p> <p>It would appear that you intend to charge a licensing fee Is this correct? If so how much do you intend to charge per property? I only own and let the one property.</p> <p>I would deeply resent having to apply and pay a fee for letting my own property.</p> <p>I do fully appreciate that action does need to be taken against bad landlords. However, I employ a good agent who regularly inspects the property and advises me of the condition and ensures that the property is in a good state of repair.</p> <p>The commission I pay the agent, plus the repairs I carry out when advised by them does in my view fulfil my responsibilities as a good landlord.</p> <p>Any further amount payable to you would be an unnecessary burden with no benefit for the tenant, and in effect a tax for the sake of it.</p> <p>I would have to consider having to increase the rent to cover it, or even possibly ceasing to let the property. Neither of which would benefit anybody.</p> <p>In my view the best way forward is for you to have a register of all landlords and you carry out inspections (at your own cost) and impose penalties on those bad landlords.</p>	<p>My apologies for not responding to you earlier.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>These proposals are at consultation stage which will end on 14th January. All comments received will be taken into consideration. We have another public exhibition scheduled to take place on Thursday 7th January at Allama Iqbal Centre, 157 Cromwell Road, Peterborough, PE1 2EL – between 10am and 7pm, if you are able to attend – it is a drop in session so there is no need to book.</p> <p>All consultation responses will be considered as part of the consultation process.</p>	
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	<p>Notwithstanding the fact that my agent does regular inspections I would have no problem with you carrying out your own inspections (at our own cost).</p> <p>Alternatively you should waive the licensing fee for landlords, like myself, who employ reputable agents.</p> <p>I look forward to hearing from you.</p> <p>Many thanks. xxxx</p>	<p>Kind regards</p> <p>Sent on behalf of the Selective Licencing Project Team</p>	
18/12/15	<p>Hi, thanks for your reply. It looks like Brookdale, who I use, are members of the NLA. Will that keep me in the £50 bracket?</p>	<p>Dear Mr xxxx,</p> <p>Thank you for email regarding Brookdale's membership of the NLA.</p> <p>Brookdale are an agent and thus cannot be members of the NLA, it our understanding however that they are working towards membership of ARLA. Assuming that is successful that will attract the heavily discounted fee of £50 per property.</p> <p>Regards</p>	<p>Response sent 08/02/16</p>
21/12/15	<p>Dear Selective Licensing Project Team</p> <p>Many thanks for your note. It is helpful.</p>	<p>No response required. Points previously responded to.</p>	

However, I think you are shimmying past my central point. (Though, I realise now that my point was well hidden inside my November rant.)

The amount of the fee is irrelevant to the principle. (Although you are probably right to assume that I wouldn't bother arguing for the sake of a tenner. But I have started now, so I'll finish.)

Whether or not the scheme makes a profit is equally irrelevant. I cannot influence the performance of the scheme to make sure I get value for my money; or take my business to a different supplier if your service turns out to be poor. The fact is, if this scheme goes ahead then you take whatever amount of money you see fit and that is the end of it. I find this alarming.

But lets not get bogged down on these points just yet. My key point is this:...

I am sure Peterborough has many problems to address. And I am prepared to accept your assertion that one of those problems is:

"...also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area ..."

What I need clarification on is the reason why I have been selected in particular to fund a scheme to pay for policing this particular problem. I am not responsible for this problem. And I have not caused this problem.

	<p>Please can you clarify why I have been selected above other flavours of landlords, above tenants and above the general population of Peterborough to fund this scheme?</p> <p>Kind regards once again.</p>		
21/12/15	<p>Dear all,</p> <p>I live in Welland but the property I rent out is on xxx.</p>	No need for a response – as this is a reply to our response	
22.12.15	<p>Good afternoon,</p> <p>Would it be possible to pass this email to the relevant department within the team overseeing residential property please?</p> <p>xxxx is looking to rent out a property in Peterborough, and we are in the process of finding a suitable agent.</p> <p>We are aware that the proposed fee will be £50 if the property is managed by an agent registered with ARLA.</p> <p>Would this still be the case if the agent is registered with another professional body, such as NALS, or are a member of the Property Ombudsman?</p> <p>Our choice of agent would potentially be influenced by how the scheme is planned to be implemented, so any advice you are able to provide in relation to the Selective Licensing criteria, would be greatly appreciated.</p>	<p>Dear xxxx,</p> <p>Thank you for your email about Peterborough City Council's proposed Selective Licensing scheme.</p> <p>I can confirm that the fee for landlords who are accredited with national bodies such as the National Landlords' Association (NLA) or the Registered Landlords' Association (RLA) would be £50 per property for the five year period.</p> <p>In terms of letting agents, as you mention, ARLA and NALS accredited managing agents would also qualify for the £50 fee.</p>	<p>Yes. GG sent 08/02/16</p>

	<p>Many thanks in advance,</p> <p>Kind Regards</p>		
22.12.15	<p>Good evening</p> <p>Please find attached representation on behalf of Millfield and New England Regeneration Partnership. I would be grateful if you would kindly acknowledge safe receipt.</p> <p>Yours faithfully</p> <p>xxxx</p> <p>Secretary</p> <p>MANERP (SEE ACCOMPANYING LETTER)</p>	<p>Dear Ms xxxx,</p> <p>Thank you very much for your letter on behalf of Millfield and New England Regeneration Partnership about Peterborough City Council's proposed Selective Licensing Scheme.</p> <p>We have noted the Partnership's comments in support of the proposed scheme will ensure that they are taken into account as part of the public consultation.</p> <p>Thank you again for taking the time to let us have your comments.</p>	<p>Yes Sent 08/02/16</p>
22.12.15	<p>Thank you for your response.</p> <p>A couple of points.</p> <p>While I appreciate 'you' need to get balanced feedback, however, your questions and statements should also be balanced, many of your question are 'closed' and assert that their are issues and that they will in some way be remedied by SL, which may or may not be the case - where is your evidence?</p> <p>You state that "SL will "increase the number of landlords using formal tenancy agreements", why, what evidence do you have to support this?</p>	<p>Dear Mr xxxx,</p> <p>Thank you for your response to the proposed selective licensing scheme consultation.</p> <p>We are targeting both ignorant and criminal landlords. By increasing both Landlords' and tenants' awareness of the need to use tenancy agreements the number will rise overall. Remember that this is two sided – tenants are often not aware of their rights to ask for a formal agreement and the increased publicity provided by SL will improve this position</p>	<p>Yes Sent 08/02/16</p>

	<p>Why do you think payment will have any affect in the 'bad landlord' issue? There is enough legislation in place to deal with them, it's identifying them and the lack of implementation that is the issue - you are not suggesting additional legislation in your letter.</p> <p>You have not answered my point regarding the biggest single reason for overcrowding - tenants wanting to keep costs down - Landlords don't create overcrowding, tenants do.</p> <p>Illegal immigrants and dodgy landlords seek out each other due to their needs, what makes you think these landlords will in some way partake in SL? You don't know who most of them are now (or you would be challenging them), why do you feel you will be able to identify them with SL?</p> <p>I find it poor that you try to use TB as a reason to bring in SL and your suggestion that overcrowding is somehow 'partly to blame' is factually incorrect. Not only is there no evidence to suggest overcrowding is a factor for TB (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/360335/TB_Annual_report__4_0_300914.pdf) but repost shows that TB fell 11% in the last 2 years and previously was stable since 2005! This is a perfect example of you muddying the water to suit your ends!</p>	<p>With current legislation we can only respond to issues once we are made aware of them. Selective Licensing will provide the Council with the ability to be more proactive and by targeting those landlords who are not licensed we will be able to identify criminal behaviour more effectively, leading to greater enforcement and prosecution</p> <p>We understand that sometimes tenants deliberately drive overcrowding, but by increasing training and awareness of both landlord and tenant to the dangers, and by increasing the number of tenancies with a formal agreement, landlords should and must take action once it is brought to their attention.</p> <p>The housing team considers that overcrowding is one of the most common and serious issues that SL will tackle. Notwithstanding your points on TB, it (and other diseases) flourish far more in overcrowded properties than would otherwise be the case. Fire safety is the other main concern.</p> <p>The Council does not consider this a pointless tax. £50 over 5 years for a landlord who is accredited (or use an agent that is) we do not believe to be financially onerous and we do not accept that this fee makes a material impact to the financial performance of the residential investment. The difference between this and un-accredited fee of £600 does, however, encourage landlords to put themselves in a position where the obligations and changing legal requirements are understood.</p>	
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	<p>Please make decisions based on facts, not conjecture. The powers are already in place to reduce 'bad landlords', the council needs to use them and not levy pointless taxes on the masses to to catch a few bad apples.</p>	<p>This price differential is a significant difference between PCC's approach and other SL schemes around the country.</p> <p>Thanks once again for your feedback</p> <p>The SL team</p>	
22.12.15	<p>On one of your public consultation meetings I asked if St Augustin Walk in Woodston was in one of the proposed areas for selective licensing, you could not tell me on the day and asked me to email you.</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>I can confirm that St Augustin Walk in Woodston, does not fall within the proposed area.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	<p>Yes Sent 08/02/16</p>
22.12.15	<p>Good afternoon,</p> <p>XXXX is looking to rent out a property in Peterborough, and we are in the process of finding a suitable agent.</p> <p>We are aware that the proposed fee will be £50 if the property is managed by an agent registered with ARLA.</p> <p>Would this still be the case if the agent is registered with another professional body, such as NALS, or are a member of the Property Ombudsman?</p> <p>Our choice of agent would potentially be influenced by how the scheme is planned to be implemented, so any advice you are able to provide in relation to the Selective Licensing criteria, would be greatly appreciated.</p>	<p>Repeat entry</p>	<p>No additional response required.</p>
13.01.16	<p><u>To whom it may concern</u></p>	<p>Athene liaising direct</p> <p>- Done</p>	

	Thank you for the opportunity to comment on consultation for Selective Licensing plans in Peterborough. Please see the attached document.		
13.01.16	<p>Dear Sirs</p> <p>Further to the recent consultation regarding the introduction of selective licensing in parts of Peterborough, please find attached the response from Communities Against Selective Licensing (CASL) concerning the current proposal.</p> <p>We look forward to hearing from you in reply by way of email please to the email address above.</p> <p>Yours faithfully</p> <p>SEE SAVED LETTER</p>	<p>Dear xxxx</p> <p>Thank you for your letter of 13 January about Peterborough City Council's proposed Selective Licensing Scheme.</p> <p>We have noted all of the points you raised both at the public exhibition on 7 January and in your letter and can assure you that these will be taken into account as part of the public consultation.</p> <p>Kind regards,</p> <p>Sent on behalf of Peterborough Selective Licensing Project</p>	<p>Yes GG responded 02/02/16</p>
13.01.16	<p>Dear Selective Licensing Team,</p> <p>Whilst I applaud the Council's desire and effort to improve housing standards and management of privately rented properties in (Peterborough)(the areas where Selective Licensing is proposed), I strongly feel that Selective Licensing is not the way forward. The Council already has at its disposal a large number of powers to control poor property conditions and does not require licensing to give it additional powers.</p> <p>The Housing Act 2004 was enacted at a time when Labour was in power and so the powers given to local authorities to introduce selective licensing schemes have been around for some time. . However, it is only in the last few years that we</p>	<p>Hi xxxx,</p> <p>Thanks for your input into the Selective Licensing consultation process, which has been forwarded to me. It's appreciated.</p> <p>I understand your comments, which are reflective of some of the feedback we have received from some of the landlords; conversely, there are a number of landlords who are generally in favour of the scheme and we need to consider not only the direct feedback but also the social effects of introducing such a scheme and make a decision which on balance appears to be the correct one. I will address some specific points you've made, within this email.</p>	<p>Yes Responded to by xxxx 15/01/16</p>

	<p>have seen local authorities up and down the country bring in selective licensing schemes.</p> <p>As an elected representative of the residents in the Central Ward area (which is part of the area to be affected) where I am Councilor, I find it very difficult to explain and justify to residents when they question me about this scheme. There is a perception in the community that they have been deliberately targeted by this scheme because of their background and heritage. They ask me why is this being introduced in areas that we predominantly live and own property in. Why is this not being introduced in areas such as Paston and Welland. I have to agree with their sentiments. Whilst I accept that there are problems in the area, selective licensing is not the tool that should be used to fix these problems.</p> <p>The Labour group put forward a motion in January 2015 advocating that a City wide licensing Scheme should be introduced in Peterborough. In response xxx said that there are enough powers within the Housing Act 2004 and elsewhere for the bad landlords to be prosecuted. He also said that there are good landlords who are providing a very valuable service. Are you telling me now that there are no good landlord in this area. Are you telling me there are no bad landlords in Paston and Welland which are not included.</p> <p>One of the stated aims of the selective licensing scheme is that it will result in a strong or settled community. Far from this. This scheme will result in a denigration of this area. It will be become no go area because by labeling it as an area requiring selective licensing people will not want to live or move into the area. The area will not attract any investment. The excessive regulation centered around selective licensing will impact negatively on the private rented sector because of the disincentives it creates for potential investors. The claims that</p>	<p>The issue of being able to introduce a scheme that is city-wide is something that has been raised at almost every consultation event. It is our view that legislation prevents us from introducing a scheme which would cover the whole city. Just last week the London Borough of Redbridge was unsuccessful in its attempts to introduce a borough-wide scheme; government guidance is clear: Selective Licensing should concentrate solely on those areas where there is sufficient evidence to warrant it. The evidence base used for Peterborough is clear that some areas would benefit, whilst others would not. Therefore to embark upon proposing a scheme that covers the whole city would be bound to fail.</p> <p>The first filter used to determine whether a scheme could be justified is whether an area comprises a high level of private rented stock (high levels can be deemed to be those above the national average which is currently 19%). The areas that people perceive to suffer issues similar to those within the proposed boundaries do not meet this criteria. This is largely because they are dominated by social housing which is managed by the City's registered social landlords. In addition, whilst those areas may be perceived to contain the same issues, the evidence does not suggest they suffer the same issues (both visible and hidden) that those areas identified do. This is clear within the evidence document supporting the scheme. The proposed scheme covers a number of areas across the City and is not based upon political ward boundaries. Any suggestion that a particular group of landlords are being targeted (either directly or indirectly) is simply rejected by the council.</p> <p>The suggestion that the council has sufficient powers to</p>	
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	<p>tenants will benefit from selective licensing because of the raising in standards is misplaced. The opposite will be the case as licensing will discourage better landlords from investing in the area. Less investment will lead to poorer housing and it is the increase in investment in the private rented sector that has been the driver of rising housing standards not more control and regulation. There will be no community cohesion and that is the very thing that selective licensing is supposed to achieve. There is also evidence to suggest that some banks such as NatWest will not lend to people buying properties in selective licensing areas.</p> <p>There is no real evidence that selective licensing has worked anywhere else. In fact Manchester City Council has chosen not to renew its scheme. Manchester found that selective licensing did not achieve the outcomes it wanted and that only the responsible landlords came forward quickly. However, the time taken to process applications, chase up paperwork and inspect properties pulled the focus away from targeting and enforcing poor landlords to raise standards. So the main aims of the scheme could not effectively be achieved. I am afraid that the same will happen here.</p> <p>Peterborough City Council needs to be able to devote its finite resources to properly enforce existing legislation and target those landlords who cause problems rather than spending significant amounts of time registering and regulating those landlords who sign up to licensing and so make themselves known.</p> <p>What is absent from this scheme is the apparent lack of focus on tenants. Just as there are bad landlords there are equally bad tenants. No amount of referencing will alleviate the problems cause by bad tenants. The bad tenants will need more than educating. A booklet containing the rights and</p>	<p>enforce against bad landlords already is another regular comment. It is, however, in my view ill-conceived. Yes we have powers but the council is only able at present to offer a <u>reactive</u> service based upon the receipt of complaints about housing conditions. This means it is always on the 'back-foot' and has no real control over the condition of private rented stock across its city. It relies on landlords doing the right thing. Unfortunately the evidence suggests that a number of landlords simply do not do the right thing and thus our housing enforcement team are dealing with appalling conditions which are, in some cases, shameful for a City in the 21st century. We accept this is not all landlords, but those who do the right thing are encouraged to join one of the nationally approved schemes and take advantage of the highly <u>discounted fee of £50</u> for the full five year licence. The more accredited landlords we have the greater our ability to use our finite resources to target those who have not registered or seek to continue to act in a criminal manner.</p> <p>As I've said to you before, the idea that the area will degenerate because of selective licensing is not one that I accept. The raising of housing conditions is likely to mean that the area will become more desirable with market forces resulting in increased value of the housing stock.</p> <p>Certainly the issue of some bad tenants is real. That is why we are looking to introduce public space protection orders that are coterminous with any proposed selective licensing area. This will allow our enforcement teams to tackle individual behaviour in a more effective way. We will also be introducing training for landlords on how to effectively deal with poor tenants; the bedrock of this is the proposed condition that tenancy agreements are a pre-requisite of a licence. You'll be</p>	
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	<p>obligations of tenants will not be sufficient and just as a registration scheme is proposed for landlords there should be a similar registration scheme for tenants who can be vetted and considered fit and proper.</p> <p>In conclusion I feel strongly that this scheme will not work as it will not capture the bad landlords who are the intended targets. It will only capture the good landlords who will co-operate and the Council will spend more time processing the applications of the good landlords rather than taking action against the bad landlords who will not register themselves. I would urge everyone to learn from the experience of Manchester City Council"</p>	<p>aware that in many cases tenancy agreements simply do not currently exist.</p> <p>You make mention of Manchester as a scheme to learn from. Whilst Manchester may not be renewing its scheme that is an issue for them; it may not fit their City's current need. Government currently allows a scheme to run for 5 years only. It is not intended to be a long-term feature of current policy, it is designed to raise standards. Any scheme should show tangible improvements within that 5 period. I would expect that to happen here.</p> <p>We want to use our finite resources effectively. Reactively responding to complaints about appalling housing conditions is resource intensive and ever increasing. We need to proactively raise housing standards. We hope that most landlords will demonstrate their intent to do the right thing by becoming accredited, thus allowing those finite resources to concentrate on those criminal landlords who are abusing vulnerable people in our communities.</p> <p>Kind regards</p>	
13.01.16	<p>To whom it may concern,</p> <p>I am writing to oppose this 'Selective Licensing' scheme as I think firstly if there are any 'rogue' landlords that you say then they should be dealt with accordingly. I have lived in the central ward for over 30 years and do not think that this selective licensing will help tackle the problems that you are raising. The central ward needs to be looked at and money</p>	<p>Dear Mr xxxx,</p> <p>Thank you for your email responding to the Selective Licensing Consultation.</p> <p>We have noted all of your comments as part of the public consultation on Peterborough City Council's proposed Selective Licensing scheme.</p>	<p>Yes Sent by GG 08/02/16</p>

	<p>pumped into this and other areas that are of concern to you to tackle problems with number 6 on your questionnaire. I don't think introducing this scheme will eliminate such things as crime, nuisance, street parking, litter, use of drugs, rubbish dumping, large gatherings and the large number of off licences. More facilities need to be made available especially for the younger generation, more police presence made available like it used to be.</p> <p>Secondly I think it is unfair on the majority of decent landlords out there and adding this again will not solve the initial problem that you are trying to rectify. Those 'rogue' landlords that you mention like said before need to be tackled accordingly and not make those who comply by the rules and regulations to suffer.</p> <p>Finally I have raised concerns with parking on Cromwell Road for the last 6 years where still nothing has been done but as soon as there is some benefits to the council this has been and consulted in a very short space of time. Why did my issue that I raised over 6 years ago still not been sorted but this seems to have been escalated on such a short time frame. I makes me think that where there is a need for attention you do not enforce but in my case keep me waiting?</p> <p>I, like many others, will suggest you re think in trying to impose this selective licensing on all landlords as this will not solve any of the problems that you are trying to resolve. You will be wasting the time and money of a lot of people.</p> <p>I totally disagree with this scheme that you are trying to introduce as it will only benefit yourselves financially.</p>	<p>In terms of your concerns about the impact of the proposed scheme on good landlords, the council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area. By introducing a Selective Licensing scheme, landlords would need to meet certain conditions which mean that they would have to upgrade any currently unsafe or unhealthy properties. This would enhance the protection available to tenants and reduce over-crowding and anti-social behaviour.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents.</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>Kind regards,</p> <p>On behalf of Peterborough Selective Licensing Project Team</p>	
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	Regards		
13.01.16	<p>Dear 'office'</p> <p>I am a landlord with a property in one of the proposed selective licensing areas in Bretton.</p> <p>I have completed your online survey, but felt I had to write as I am wholly opposed to the scheme.</p> <p>We have had this property for almost two years. The house was occupied in good order. It was checked and certificated by an electrician and gas safe installer with appropriate alarms fitted. It was well decorated throughout with carpets, flooring, curtains and blinds, with new carpet provided in two rooms. We also fitted new kitchen units and provided a new cooker.</p> <p>Unfortunately our previous tenant was what we describe as a 'nightmare', which is what gives landlords a bad name. They eventually abandoned the property, after 18 months, leaving it in a very bad state, ripping out the curtain poles and taking the curtains and blinds, leaving a brand new carpet in a filthy state. Holes in wall and interior doors. Also with arrears, but glad that they have now left. We worked very hard with the tenant, female with two children, to help, but to no avail, there is only so much you can do. Despite having a tenancy agreement, there is still not much that can be done to evict a tenant. She was told to 'stay put' by the housing department at PCC and they were not forthcoming with any advice for us as landlord when we asked.</p>	<p>Dear xxxx</p> <p>Thank you for your email and completing an online survey. We are sorry to hear of your bad experience of being a landlord.</p> <p>The council acknowledges that many landlords provide decent well-managed and well maintained accommodation, which does not cause any problems for the local community. There are, however, also properties that are poorly managed, suffer from overcrowding, or provide unsafe accommodation. These properties have a negative effect on their local area.</p> <p>By introducing Selective Licensing within the designated areas, it would benefit the local community and it would ensure that all private rented property are managed to a satisfactory standard.</p> <p>We have noted all of your comments and will consider them carefully as part of the public consultation.</p> <p>Kind regards,</p> <p>On behalf of Peterborough Selective Licensing Project team</p>	<p>Yes Reply by GG 08/02/16</p>

	<p>It is very often the tenant that gives landlords a bad name. Some tenants, as ours was, had little respect for the property, themselves, or any authority that tried to help them, even something as simple as putting the bins out on a weekly basis.</p> <p>We have now redecorated the whole property throughout, cleaned carpets and provided some curtains. It has also been gas safety checked and electric, with a new fuse board incorporated this time. A lettings agency has now found us a new tenant, so they have carried out the appropriate checks and a tenancy agreement is in place.</p> <p>We have done everything we can to provide a decent home for our new tenant, as with our previous tenant, like I'm sure other landlords do. We feel very aggrieved that as landlords, you are now proposing to make a licensing charge and cannot see what benefit will be offered in return for a fee. Please note that we are wholly opposed to this.</p> <p>The whole process of tenant and landlord is based on trust and co-operation. A license fee will make no difference to a property if the tenant / landlord trust breaks down.</p> <p>You cannot hold all landlords accountable for wrongdoings caused by some, likewise with tenants and these should be dealt with individually. We hope that you will not move further in setting up the proposed licensing fee</p>		
13.01.16	<p>Dear sirs</p> <p>As a private landlord/leaseholder of a Cross keys property I would like to object to your plans for SL.</p>	<p>Dear xxxx</p> <p>Thank you for your email and comments.</p> <p>If you (as a landlord) have accreditation from NLA or the Residential Landlords' Association (RLA) your fee will be £50</p>	<p>Yes GG sent 08/02/16</p>

	<p>I believe that the suggested costs administered as two flat bands should be based on the size of the property particularly for single let property. My property is only a one bedroomed flat and I consider it inequitable that I could incur the same charge as that for a 5 bedroomed house where the rental income would be far in excess of my revenue.</p> <p>I administer my property through a reputable agent who ensures that I keep the property in a good state of repair, take up references and follow several of the other good practice measures you intend to impose on landlords.</p> <p>I fear that by a blanket approach you will discourage good landlords in entering and continuing in the market .</p>	<p>per property for the entire five year period. Likewise if the property is managed by an ARLA accredited agent the fee is also £50.</p> <p>It is proposed to charge landlords without accreditation (or without accredited managing agents) a fee of £600.</p> <p>We have noted all of your comments and will consider them carefully as part of the public consultation.</p> <p>Kind regards, On behalf of Peterborough Selective Licensing Project team</p>	
13.01.16	<p>I wish to provide feedback into the Peterborough Council Selective Licencing Consultation, Please see the attached document.</p> <p>And I look forward to your acknowledgement and reply in due course.</p> <p>Selective Licencing Consultation</p> <p>I wish to register my Views about the proposed Selective Licencing for areas of Peterborough:</p> <p>1. There are obviously some run down and neglected areas of Peterborough, as there are in many Cities across the UK, and I am sure there will also be some rogue landlords and also some bad tenants but Selective Licencing will not rid Peterborough of bad Landlords and bad tenants, this is a job for Local Authority or Police who I believe already have more than</p>	<p>Dear xxxx</p> <p>Many thanks for taking the time to respond to the Selective Licencing proposals.</p> <p>Your feedback will be included in the final report to the Secretary of State should PCC decide to proceed to this stage.</p> <p>To take your points:</p> <ol style="list-style-type: none"> 1. Selective Licencing has been designed to help identify criminal lanldords more easily and so allow for more effective prosecutions. Those who are accredited (or who use an accredited agent) are less likely to be engaging in criminal behaviour. At present we are forced to wait and react to incidents, whereas SL gives the Council the ability to identify problematic landlords much earlier. 2. SL is limited by Government policy private residential properties, and can only be introduced into areas where the percentage of housing stock in the private 	<p>Yes GG sent 08/02/16</p>

	<p>adequate existing legislation but they do need to enforce the laws.</p> <p>2. The proposed Selective Licencing areas will also not encompass some of the most deprived areas of the city</p> <p>3. By making responsible landlords pay a fee to be inspected; it will not improve the above situation.</p> <p>4. It is not appropriate for me to argue against the proposed requirements to provide good Housing conditions and any good responsible landlord will already comply with all the requirements but it seems that this scheme has been inadequately thought through and it will financially penalise good Landlords and no mechanism has been demonstrated as to how it is proposed to address the issue of bad landlords or bad tenants or if it will even improve the areas.</p> <p>5. The Council have not put forward any evidence that this scheme will work and in fact they do not have a good track record of managing such schemes. A few years ago they introduced their own City wide accredited Landlord Scheme, which included inspecting private rented properties and vetting the landlords, but for some reason, they then just let it lapse, so, why should any new scheme be better? Except that now this scheme only covers a selective area and it will bring in an income.</p> <p>6. I also believe that because a Selective Licencing scheme will increase the Landlords costs this will inevitably be passed onto the tenant by way of increased rents, whilst at the same time</p>	<p>rented sector is greater than 19%. Some of the most deprived areas in the city have a large percentage of social housing (subject to separate legislation) and do not meet the 19% PRS required.</p> <p>3. Registration by responsible landlords as having the appropriate accreditation allows the Council to focus on the unaccredited landlords.</p> <p>4. A “good” landlord is likely to be one that is accredited by one of the national landlord organisations, or else will use a managing agent that is accredited by an appropriate national body. In either case the fee for the full five year period will be £50 per dwelling. We consider it imperative that residential landlords are abreast of current legislation (e.g. Legionella testing, CO alarms) and we do not consider that this fee make a material impact on the investment performance of the property.</p> <p>5. The scheme is self-funding. The scheme’s income cannot be used for anything outside the scheme.</p> <p>6. Please see 4</p> <p>7. The areas were selected purely on the data available and in accordance with the DCLG guidance on the criteria that may be applied to the possible introduction of SL. See also Q2</p> <p>8. Some of the legislation covers HMOs</p> <p>9. Asking for a reference is not a sure fire way to eradicate poor tenants. However, it will help. Landlords must still make their minds up as to whether to let to a tenant, reference or not.</p> <p>10. Noted, we will check the drafting</p> <p>11. SL aims to significantly improve the quality of the properties in certain areas, as well the behaviour of both landlords and tenants, though both licensing and</p>	
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	<p>it will have a devaluing effect of the property in the area because any private purchasers will be put off from buying and it will also put a slur on good landlords and good tenants.</p> <p>7. This Selective Licencing document appears to have been written with a few problematic areas of Peterborough in mind and also a few bad landlords in mind and is trying to tar everyone within the Selective areas with the same brush. The information within the document gives the impression that all Private Tenants are bad, but is it not likely that Social Housing Tenants and also those who own their own property are equally as problematic and these proposals do not give any indication how these issues will be dealt with. It also assumes that the private tenants are the ones producing Waste and Graffiti in these areas. But there is no evidence demonstrated to show that Private House owners or Social Housing Tenants are not equally to blame. This scheme will not address those issues and bad landlords will still not comply and will still flout the law</p> <p>8. Many items within the Document seem to have been written with HMO's in mind rather than one family one dwelling</p> <p>9. There is a requirement to give a reference when asked and state if there has been any Anti Social Behaviour. This requirement will only be effective if all Landlords in Peterborough also have to comply, otherwise it will be ineffective because "landlords wishing to be rid of a tenant are often economical with the truth and/or a landlord will often be unaware if their</p>	<p>other initiatives like Public Space Protection Orders. At the end of the period the area will be more salubrious and the properties worth more.</p> <p>12. There is no intention to launch a separate PCC Accredited Scheme. PCC will accept accreditation from agreed national organisations (landlord and tenant).</p> <p>13. It will be self-financing. Numbers of staff are being worked out.</p> <p>14. The scheme finances greater investigative powers so identifying un-registered landlords will be easier.</p> <p>15. The cost of tenancy agreements should be built in to the landlord's costs for leasing properties. Are you suggesting that landlords should consider investment appraisals that do not consider this as a minimum requirement? We consider that tenants that are not prepared to sign a reasonable agreement should not rent, but it's a negotiated contract.</p> <p>16. PCC's general approach is that agreements should be in English</p> <p>17. The consultation allowed for members of the public to meet in person at the exhibitions those tasked with proposing the scheme, and to ask questions or seek clarification. However, the consultation also allowed for free text responses to either an email address or a Freepost address, and points of view could be sent in. Your letter and this response is proof of that!</p> <p>18. Closed questions were deliberately used in the questionnaire as this allows data analysis. We consulted with 40,000 residents so collating and analysing free text responses as part of the questionnaire is impractical. The questionnaire was also deliberately written so that owner occupiers, tenants and landlords could all respond.</p>	
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	<p>tenant has caused Anti Social Behaviour and putting this requirement on a Landlord is unreasonable.</p> <p>10. There are various inconsistencies in the guidance Document, leaving me to believe that it has not been fully thought through. e.g.</p> <p>☒ “those aged 2 to 8 inclusive are children: those aged 11 and above are Adults”. and it also uses the terminology “children over 10 years old”. Therefore which category do those aged pre 1, 1, 9 and 10 fall in?</p> <p>☒ Notify of “Changes to liability insurance” although there is no mention of a requirement to initially inform the Council of the details.</p> <p>☒ “Notification of foreclosure or repossession” Repossession of what? And foreclosure which is an American term which I understand in UK courts is almost never used.</p> <p>I do not believe that the Council has addressed the following points:</p> <p>11. I am a landlord. What are the benefits of Selective Licensing for me?</p> <p>12. If a Landlord is already “Accredited” by an Association, what are the additional benefits from also having a Peterborough City Council Accredited Licence apart from costing an extra £50 per property per 5 year?</p> <p>13. How many additional staff are required by the Council to manage this Scheme and will it be self financing etc. (There will be Inspections and regular Certificate checking and filing).</p> <p>14. The Council Employees intending to manage this scheme, state that they do not have a complete list of Private Landlords, therefore how are they expected to identify those that do</p>	<p>Many thanks for your response and we genuinely do appreciate the time and trouble you’ve taken to write in.</p> <p>Yours sincerely</p> <p>SL team</p>	
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	<p>not join the scheme?</p> <p>15. If Selective Licensing Conditions, have to be complied with before the next change of Tenancy then Tenants will need to be issued with a new Lease Agreement, which will increase Landlord operating costs, is that correct? And what if a Tenant refuses to sign new Agreements?</p> <p>16. It is expected via the Conditions required that extra details must be included within the Tenancy Agreement Pack so that the Tenant is aware of their responsibilities and details about their Landlord. In our experience Tenants do not read the information they are given now, even if they are English speaking. It is a compounded problem if the Tenant does not speak/read English and I believe that Agreements must be written in English, in case it is necessary to enforce them through an English Court System. I believe the onus must be on the Tenant to read an Agreement. What is the Councils view on this as I have heard that they will expect Landlords to issue Agreements in the Tenants native Language. So how is this to be addressed?</p> <p>The Consultation Meetings.</p> <p>17. These Public Consultation Meetings, I believe were flawed. Consultation should be a process by which the public's input on matters affecting them is sought. In fact at the meeting I attended it was nothing more than display boards and the Council staff manning the displays were those who had been instructed by their employer to implement the scheme,</p>		
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	<p>there was no mechanism to discuss the impact of the scheme and Landlords concerns with the appropriate decision making Council officials.</p> <p>18. The Consultation Questionnaire was not impartial and was written by using “closed questions” to obtain the feedback required by the Council because I suspect that the bulk of persons who would complete these questionnaire’s would be landlords and the questionnaire was biased to the detriment of Landlords. By not asking appropriate questions to get a balanced view, the Survey wase slewed in favour of the Council.</p>		
13.01.16	<p>Dear Sirs</p> <p>I received a letter regarding Selective Licensing that Peterborough Council is going to Consultation. I would appreciate it if you could advise whether I <i>am</i> classed as a landlord. The reason for my query is set out below:</p> <p>I own xxxx and there is no mortgage on this property.</p> <p>I have lived/owned the property for approximately 22 years and it has always been the family home housing myself and my 2 sons, xxxx.</p> <p>I later re-married and moved in with my husband whose work and property was in Hemel Hempstead. My 2 sons remained in the property and I stay there when I come to visit them, friends or my elderly parents.</p> <p>They do not pay me any rent as it is their “home”, however, as they are the main residents of the property, they do pay the utility bills and Council Tax.</p>	<p>Dear Ms xxxx</p> <p>Thank you for your email.</p> <p>Although your property falls within the proposed area for Selective Licensing.</p> <p>The legal definition of a landlord is that of someone being the owner or possessor of an estate in land or a rental property, who, in an exchange for rent, leases it to another individual known as the tenant.</p> <p>Therefore as you do not receive rent from your sons, you are not classed as being a landlord.</p> <p>Thank you for your enquiry.</p>	<p>Yes GG sent 08/02/16</p>

	<p>Naturally, I pay the Building Insurance and TV License.</p> <p>Due to the above, can you advise whether you would in fact call me as a Landlord or just a “mother” whose boys live in the family home?</p> <p>My husband and I are in the process of purchasing a house in Spalding so that I can be closer to my very elderly parents (in their late 80’s) and also to get his mother moved from Newcastle to a retirement flat also in Spalding so that we can take care of them.</p> <p>I look forward to your response as soon as possible.</p> <p>Yours faithfully</p>		
13.01.16	<p>Hi,</p> <p>I would just like to say I would not like to take part in the Selective Licensing questionnaire, so if possible please could you opt me out.</p> <p>Kind Regards</p>	No need for a response	
13.01.16	<p>No Name left</p> <p>Hi,</p> <p>I am a resident living in an area adjacent area to the proposed area for selective licensing.</p> <p>The new 5 year licence for only a few areas is not a good idea. if there are so called dodgy landlords then it will simply move them out to areas such as West Town, Ravensthorpe, and Westwood where house prices are cheaper than some of the</p>	<p>To whom it may concern</p> <p>Thank you for your email and your comments raised.</p> <p>All feedback received will be taken on board as part of the public consultation.</p> <p>Kind regards Sent on behalf of Selective Licensing Project Team</p>	<p>Yes GG sent 08/02/16</p>

	<p>proposed areas. therefore the problem will simply spread out to the rest of the city during the 5 years.</p> <p>Surely there must be existing laws and legislation for the council and police to enforce and use against the landlords and tenants who are causing problems.</p> <p>Thanks</p> <p>Resident</p>		
13.01.16	<p>Hi</p> <p>Mr xxxx is a Landlord of a property here in Peterborough.</p> <p>If and when the selective licencing scheme will go ahead and who has been appointed as the training scheme organisers.</p> <p>Is a member of the residential landlord association.</p>	No further response needed	
13.01.16	<p>Hi</p> <p>Are the flats in the Hereward Tower development in the Selective Licensing Scheme?</p> <p>1-34 Hereward Tower Broadway PETERBOROUGH PE1 1GY</p> <p>On fees: is the "House in Multiple Occupation" fee for all HMOs or only large HMOs (i.e. which have to be registered with the council)?</p>	<p>Dear Mr xxxx</p> <p>Thank you for your email.</p> <p>I can confirm that xxxx falls within the designated area.</p> <p>Many thanks Sent on behalf of Selective Licensing project team</p>	<p>Yes GG sent 08/02/16</p>
13.01.16		<p>Dear Ms xxxx</p> <p>Thank you for your email. The fee structure is set out below:</p>	<p>Yes GG sent 08/02/16</p>

	<p>Please provide an answer to the first question I asked:-</p> <p>1) Reduced fee of £50 if member of association etc – can you confirm if this applies for Single Lets & HMOs?</p> <p>Regards</p>	<p>£50 if you are a landlord accredited with a nationally recognised organisation such as the National Landlords' Association or Residential Landlords' Association, or if the property is managed through an agent registered with the Association or Residential Letting Agents.</p> <p>£600 for a single let property if the landlord or agent does not have the accreditation mentioned above.</p> <p>£750 for a House in Multiple Occupation (HMO). This is a house let to three or more persons forming two or more households. Note that HMOs already require a licence.</p> <p>Thank you once again.</p> <p>Sent on behalf of Selective Licensing project team</p>	
13.01.16	<p>Good Morning xxxx,</p> <p>I am the owner and landlord of xxxx, Peterborough, xxxx.</p> <p>You keep sending letters to my Father xxxx, re the above subject matter and I have already informed you that I now own the property as my Father has xxxx and resides permanently in a care home.</p> <p>I am very concerned about this matter and want to ensure my voice is heard and that I have an opinion.</p> <p>Can you please ensure the property's details are updated and that it shows myself as the owner and my home address.</p> <p>My details are as follows;</p> <p>xxxx</p>	<p>Dear Mr xxxx</p> <p>I have checked the council tax records for xxxx and they show the owner to be xxxx as you say.</p> <p>Unfortunately we are unable to make any amendments to their records on your behalf, you will need to contact the council tax department directly to update the records. You can contact the department by telephone on 747474 or via the website.</p> <p>The consultation ends on 14 January so you can still complete the questionnaire until close of play today.</p> <p>Regards</p>	<p>YES 14.01.15</p>

	Can you also confirm that I am still able to complete the online questionnaire up to the 14th January 2016?		
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13.01.16	<p>Dear Sirs</p> <p>I would like to give the reasons why I believe your plan to introduce Selective Licensing in Peterborough is wrong in principle and will be ineffective in ridding the City of criminal landlords.</p> <p>First of all, most Landlords in the private rental sector are still reeling from the shocking plans announced by the Chancellor to apply income tax on finance costs rather than to treat it as a fully allowable expense as it would be in all other businesses. In certain circumstances those of us with finance on our rental properties will soon have to pay tax on losses! I really question if this can even be lawful let alone fair when up till that point the government had openly encouraged landlords to provide much needed rental stock in times of mass housing shortage. It is now even more apparent though that there is a campaign to kill off the private rental sector with the additional 3% Stamp Duty Land Tax levy on Buy-To-Let property purchases from next April and the additional powers granted by the Treasury to the Bank of England to rein in BTL lending.</p> <p>At some stage in the near future we all expect bank interest rates to start rising too, so this will only compound the proposed tax changes for landlords with mortgage debt. Some of the losses this will cause will be passed onto the tenant but there is a limit to this practice and if the landlord cannot stand those losses bankruptcy will inevitably follow.</p> <p>So I ask that Peterborough City Council reconsiders very carefully before bringing in Selective Licensing, which could further weaken the financial plight of good, law abiding local landlords. You are intelligent people within the Council and</p>	<p>Dear Mr xxxx</p> <p>Many thanks for taking the time to respond to the Selective Licensing consultation. You have raised several points which we address below.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, bringing the PRS below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act. These are:</p> <ul style="list-style-type: none"> Poor property condition Inward migration Crime Anti-social behaviour Deprivation Low housing demand <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were below the Peterborough average in at least five of these six criteria. The areas were selected on the</p>	<p>Yes GG sent 08/02/16</p>
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	<p>must be aware of the massive financial penalties that will be imposed on landlords courtesy of George Osborne's plans. Have you considered that this could very well bring down the private rental sector in Peterborough, which you as a Council depend on and by adding further financial burden on landlords it will have severe consequences for all citizens of Peterborough? I doubt whether the £10m pot of cash for Councils to deal with homelessness will even scratch the surface as B&B costs to rehome those tenants who will be evicted will outstrip your share of this fund.</p> <p>If you are in any doubt about the consequences of all this financial burden imposed on the PRS I would ask that you remind yourselves of Clause 24 of the 2015 Summer Budget and then please take a look at many of the websites that have highlighted how this will have a massive effect on the whole UK economy.</p> <p>Please look at any of the following website links:</p> <p>www.saynotogeorge.co.uk</p> <p>http://www.telegraph.co.uk/finance/budget/11724804/Buy-to-let-How-todays-Budget-will-affect-landlords.html</p> <p>http://www.telegraph.co.uk/finance/personalfinance/investing/buy-to-let/11816733/Alice-in-Wonderland-buy-to-let-tax-sets-a-new-benchmark-in-absurdity.html</p> <p>http://www.property118.com/category/budget-2015-campaign/</p> <p>http://www.property118.com/budget-2015-landlords-reactions/76164/</p>	<p>data only. We reject that we are "cowardly" or that we are targeting particular groups. We are responding to a need and using the data to identify the correct areas. We consider the evidence base and methodology to be both extensive and robust.</p> <p>The legislation prohibits the Selective Licensing scheme from make a profit and the licence fee has been structured to fund the administration of the scheme and the increase in the investigative powers – both in the office and on the street – that we need to actively pursue the criminal landlords.</p> <p>Unlike many other schemes across the UK, the Peterborough licence fee has been designed to encourage landlords to gain accreditation with a recognised landlords' organisation (such as the National Landlords' Association or the Residential Landlords' Association) or to have their properties managed by an agency accredited by the Association of Residential Letting Agents (and as a result of consultation we will also allow the National Approved Letting Scheme – NALS – to be the accrediting body for agents)</p> <p>If the landlord or their agent has appropriate accreditation then the fee for the five year period is £50 per property. If there is no accreditation the fee is proposed at £600. With this structure the city council has tried to favour good landlords, this structure is in marked contrast to many of the other cities in the UK that are introducing the scheme.</p> <p>Selective Licensing brings together different aspects of legislation (some enforced by different agencies such as the Health and Safety Executive and Gas Safety) and enables PCC to proactively ensure all privately rented housing meets the legal requirements that all private rented property is of the</p>	
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	<p>http://www.theguardian.com/money/2015/oct/20/buy-to-let-tax-relief-rent-increases-impla</p> <p>We all want to see bad landlords driven out of Peterborough but your plans seem to be in danger of forcing out the good landlords by imposing further financial misery upon them. The criminals won't pay your licensing fees but will continue to charge hefty rents in return for slum properties. They may eventually feel that it's time to move their unsavoury practices out of the hotspot areas of Peterborough before they are eventually caught up with but they will just pop up elsewhere.</p> <p>Your reasons for introducing Selective Licensing are questionable. You say;</p> <p>"The introduction of a Selective Licensing scheme enables the local authority to ensure all locally privately rented stock in the designated areas meet a high standard by ensuring all housing meets the conditions set out within the license."</p> <p>How exactly? If you don't know who your local landlords are now how will you know who they are when you commence your scheme? If you do already know who they are then you should be enforcing the laws that you already have sufficient powers to deal with!</p> <p>You go onto say;</p> <p>"All private landlords with residential property within the proposed area would need to apply for a license for each property before they can be let to tenants. In order to become a license holder they must be a fit and proper person. This</p>	<p>same housing standard. At present the council must wait for a problem (like a gas explosion!) before it can act.</p> <p>You state: "Of course all law abiding landlords provide tenancy agreements – that is the law. All law abiding landlords ensure the house has an annual gas safety check – that is the law. All good landlords ensure that there is a smoke detector fitted to each floor of their properties – that is the law". However, it is clear that not all landlords do all of these things and the current legislation does not allow us to identify whether a landlord is "law-abiding" until it's too late.</p> <p>This identification is one of the key drivers behind the proposals: The Council is using accreditation with a nationally recognised body as a way of identifying which landlords (or their agents) are aware of the current legislation and can therefore act accordingly. There is no other way of making this identification and simply averring that one is a good landlord is clearly insufficient.</p> <p>Not all landlords in Peterborough provide tenancy agreements whether it's the law or not. This can be for one of two reasons: Ignorance or intent. We must deal with both and these proposals seek to do just that, with training being offered to landlords to ensure they understand their obligations.</p> <p>You further state that you, "do not go along with your idea that it is okay to charge excessive licence fees to landlords and especially for a problem that already has personnel in place to deal with it".</p> <p>In fact the license fee is only £50 for the full five years if you or your agent is suitably accredited (and I repeat we consider this the only realistic and practicable way of judging whether you are a fit and proper landlord). This fee is not financially</p>	
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	<p>means a landlord has to meet a certain standard before they can legally rent out a property.”</p> <p>I’m not sure what you mean by fit and proper because a landlord has to comply with relevant legislation regardless of whether he is licensed or not. So if any breach is brought to your attention you should be dealing with it at present whether a license fee has been paid or not.</p> <p>You then state that landlords must meet license conditions. Your conditions are already law in most cases that have powers to be dealt with irrespective of Selective Licensing. Of course all law abiding landlords provide tenancy agreements – that is the law. All law abiding landlords ensure the house has an annual gas safety check – that is the law. All good landlords ensure that there is a smoke detector fitted to each floor of their properties – that is the law. I could go on with this list of legal requirements but the point is if you are aware that a landlord is blatantly ignoring these matters then you should be dealing with it now and rather than charge the landlord with a ridiculous fee why aren’t you encouraging tenants to report any of your list of requirements?</p> <p>Most if not all of the conditions that you say the Council can impose on a landlord to ensure he is making his tenants comply with are generally already written into the most basic of tenancy agreements and normally go much further in any case.</p> <p>This is one of your weirdest lines;</p> <p>“The council would work with licensed landlords to offer training and support in order to help landlords achieve the</p>	<p>onerous and certainly does not make a material difference to the investment decisions around whether to become or remain a residential investor.</p> <p>We are disappointed about the comments regarding the open evenings, as we have found them to be well worthwhile.</p> <p>We do not accept your assertion that this scheme will drive good landlords from the city. As discussed, the fee structure is designed to encourage good landlords, and the scheme as a whole is intended to markedly improve the built environment and social cohesion of the selected areas. The combination of complementary policies like Cumulative Impact Assessments and Public Space Protection orders, together with increased focus on criminal landlords and anti-social behaviour by tenants will in due course attract good landlords, not deter them.</p> <p>Additionally, the council is proposing – together with a number of partners such as the police, fire service and housing associations – to formally create a joint prevention and enforcement team to serve the city. This will be under a single management structure to ensure effective joint working and delivery across the disciplines.</p> <p>Once again, many thanks for your feedback which will form part of the Council’s full report to the Secretary of State.</p>	
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	<p>licensing conditions and improve their knowledge and skills in renting.”</p> <p>Let’s be honest about this, because from the feedback I have received from landlords, letting agents and official staff attending your open evenings, some of your Selective Licensing Council staff have been unable to answer simple questions and others don’t appear to know what they are really talking about! So how is the Council going to train the average landlord that has a fair grasp of what <i>is</i> required?</p> <p>By forcing bad landlords out of the worst areas of Peterborough there is the danger that you will encourage them to set up in other parts of the City. However, you are actually in more danger of driving out the good landlords thus destroying the image of the City as a whole because eventually the entire place has the potential to be turned into a big slum area.</p> <p>I’m in no doubt that some areas of the City are seriously in need of attention, however when you compare the areas that you originally proposed for Selective Licensing in 2013 with what you are now proposing it beggars belief how or why you have encompassed some very respectable areas of the City into your plans. Some of these new locations should never be considered as places that Selective Licensing criteria apply to.</p> <p>It has been said by people in the City that your 2013 plans to designate certain areas within the Central Ward were shelved because of the perceived racial discriminatory nature of dealing with such an ethnically rich area in isolation. So if this was the case it now seems that to counter those claims and to water down this perception you have included places such as Priestgate, parts of the Sugar Way and Potters Way</p>		
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	<p>developments and Abbeyfields to name but a few, in a much wider designated area. You are now in danger of being accused of discrimination against a sector of people that should not be subjected to this pointless licensing scheme i.e. good, responsible private landlords. Is it really fair to target these people in order to counter those allegations of discrimination within the Central Ward where most of the real problems are? If this is the case I think it is a cowardly way to hide behind your inability to deal with the true problem, or is it just a case of cashing in by hitting many more landlords with the licence fees?</p> <p>As a law abiding landlord that is not affiliated to one of the landlord bodies but fully complies with lettings legislation, with a number of rental properties in the Peterborough area and as a retired Police Officer, having served the City and surrounding area of Cambridgeshire for over 30 years, I do not go along with your idea that it is okay to charge excessive licence fees to landlords and especially for a problem that already has personnel in place to deal with it.</p> <p>Within the City Council and all the different areas of the local authority we have Police, Border Agency/Immigration, Fire Service, Environmental Health, Trading Standards and Housing officers etc. all of whom are skilled professionals, paid good salaries and armed with existing legislation capable of sorting out the real issues that you highlight. The real problem is that nobody has the ability to allow all of these different areas of law enforcement to work together without the barrage of red tape that grinds the whole system down to a virtual crawl.</p> <p>The City Council is embarking on a course of action that tars all landlords with the same "criminal" brush. You are sending out a signal that says, "If you are a landlord you must be a</p>		
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	<p>criminal". Well I'm not a criminal and I would welcome you to come and meet me in my home, meet my tenants in their homes and meet my excellent letting agent whom I employ to help my business to be run in a thoroughly professional manner. My letting agent isn't currently a member of ARLA, however having recently worked for one of Peterborough's biggest letting agents that is an ARLA member I can assure you that my agent is far more compliant with the ARLA codes of practice and generally runs a much tighter ship all round.</p> <p>The basic fact is that those of us, who go out of our way to provide first class rental properties at a fair rent, feel that your plan is just a fund raising scheme to fill your depleting coffers that are under attack by Government cutbacks. It is being launched under the guise of Selective Licensing by charging large fees to law abiding Landlords to subsidise the practices of criminals but you have not convinced any of us that it will change a single thing in the industry.</p> <p>We all know that the criminal element within the rental sector will do whatever it can to bypass licensing and those criminals will continue to take advantage of the vulnerable without consideration for legislation or lawful requirements. But in a way, what the Council is doing is almost as bad by imposing fees on innocent landlords to pay for the crimes of the ruthless landlords.</p> <p>If you can't police the problem at present how does your idea to embark on a wider area promise to be any different? Money isn't the answer here it's the inability of the authorities to work together and to be able to share their existing resources efficiently and without fear of compromising their sensitive data. The people and departments within each individual authority already have a good idea who they should</p>		
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	<p>be targeting but because of bureaucracy these departments do not work together in a “joined-up way”, if at all in certain circumstances. Most of your target landlords are already being arrested for other illegal practices in and around the area but because it appears that you are not integrating your resources with those of the crime agencies the bad housing offences those criminals are also committing are going unprosecuted.</p> <p>We all appreciate that the Council cannot manage this problem alone so a properly organised task force comprising of all necessary areas of the authority needs to be formed on a full time basis with a view to permanency and proper direction. Once tasked for action and with good use of powers through existing legislation, including the use of the Proceeds of Crime Act such a unit can fund itself. The Police are already making good use of POCA seizures and under a current scheme, government and law enforcement agencies such as police, local trading standards and prosecutors are able to get back a proportion of assets confiscated from criminals using POCA. The law allows for 50% of confiscated funds to be recycled into crime initiatives at a local level to support crime fighting services and community projects, so if used and organised properly this incentivised scheme could easily be an alternative to Selective Licensing.</p> <p>However, if you do decide to go about Selective Licensing your way by penalising the law-abiding landlords you will just drive them out of Peterborough, causing the Council a serious financial knock-on effect.</p> <p>When property investment is entered into properly and legitimately it is not cheap and it certainly does not provide the short-term riches that your fees would seem to suggest that a landlord can afford. If I were unlucky enough to be asked to</p>		
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	<p>stump up the fees for all my current properties in one fell swoop it would cost me £5400 and if I couldn't afford to pay it I could be one of many non-paying landlords that would then be further criminalised by punitive action. The fact is in the current climate of high taxes and impending interest rate rises I could easily be facing debt!</p> <p>There are many landlords that own far more properties than I do and most of them, as I am, are funded by mortgages and are not cash purchasers. The income that I receive for my properties pays those mortgages and other fees and maintenance costs and leaves me with a small amount of pocket money, which in most cases I set aside in a contingency fund for times of crisis and void periods. My investment is the long-term capital growth, a pension fund if you like, that has grown minimally within the 7 years that I have been a landlord.</p> <p>Two of my properties have now been drawn into your latest planned areas for licensing. Both areas are good and decent areas and certainly do not fit the Council's required criteria to justify licensing. One of these is Hadrians Court, Fletton, which over the years, as my time in policing the City would tend to back-up, had a relatively small nuisance element frequenting or living within it but in recent times has become a much more amenable and acceptable neighbourhood to live in. The second property which is included in a designated area is in Deer Valley Road, Woodston, which apart from the fact that 19% of this area apparently comprises of private rental sector housing, I would argue that not one other element of the Selective Licensing criteria, let alone 5 out of the 6 of your requirements, are satisfied at all. What's more, being leasehold properties, they are very well maintained and</p>		
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	<p>monitored not just by me and my letting agent but also by the management company that acts on behalf of the Freeholder. The service charges and ground rents alone cost a further £2300 per year for both properties.</p> <p>Despite both of these properties having made small rental losses over the past years, I have continued to maintain them to a high standard and provide first class properties to the rental market. Sadly, your plan to include them in the licensed areas is the final nail in the coffin and as a result I have decided to offer these properties for sale. I wonder how many other landlords think the same as I do. Initially I hope that another responsible investor will buy my properties and take on my tenants, but Selective Licensing will no doubt be a major disincentive for them too so ultimately I will have to turn to whomever wishes to buy them, which will necessitate serving notice on the tenants to move out.</p> <p>I don't think you have given this enough thought. You will probably see a number of legitimately run rental properties placed on the housing market for sale or worse still, repossessed. Just browse through the internet property portals to see how the local market is slowly being flooded with rental properties as a direct result of all the draconian changes that have been forced on the PRS in the last 6 months. This will no doubt affect property prices adversely, especially within the areas that you enforce your licensing campaign and if prices are really hit badly those criminals that you should be targeting could easily fill the voids by obtaining some of the available rental stock in the area at knock down prices and that would just exacerbate the problem. This will undoubtedly serve to lower values in wider areas than you were originally targeting so you will be compounding the</p>		
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	<p>problem and potentially turning those places into the undesirable areas you were trying to rid the City of.</p> <p>Good landlords that were providing homes for decent tenants will be unable to afford to reinvest in other areas as they are to be penalised with an additional 3% stamp duty levy on further property purchases and you will then have many homeless people on your hands that you will be responsible for housing. So if you do decide to continue with your plans and eventually roll out the idea over the whole of the City it could potentially put a massive cost burden upon the Council in re-housing costs. Would the Council be able to pay the price of lowering the supply of good rental housing in Peterborough?</p> <p>I ask you to carefully reconsider your plans before you make what could be one of the worst and most expensive mistakes the Council has made for our City?</p> <p>Your observations and a response to this letter would very much be appreciated, but most of all I ask that you do not impose selective licensing on any part of our City and instead explore a working partnership plan with other areas of the local authority's resources.</p> <p>Yours faithfully</p>		
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13.01.16	<p>We are local landlords with several HMOs, both licensable and non-licensable (and also Buy-to-Lets which we rent to families) in Peterborough.</p> <p>We have applied for a licence for a HMO property at xxxx and have just received a letter from Abdul Malik enclosing a formal notice of the proposal to grant a licence on this property. We understand that PCC is still in the Selective Licensing Consultation period and would therefore like to make the following representations about this HMO at xxxx and about all the other HMOs we have in various parts of the city, whether in the Selective Licensing area or not. All of the following apply to our HMOs:</p> <ul style="list-style-type: none"> • As landlords, we take our responsibility very seriously • All of our properties are of the highest standard, as can be confirmed by xxxx, xxxx and xxxx who have personally inspected them • We maintain our properties to ensure that they are kept to a high standard • We only choose professional tenants who are in full time employment, many of them are graduates • We only choose tenants with no history of financial problems and who appear to be upstanding, responsible members of the community • We are very aware of anti-social behavioural problems in many HMOs, but this has never been a problem for us to date and we believe this is because we are so selective about prospective tenants • Our rents are high, reflecting the standard of the properties, and this in turn only attracts good tenants who can afford these rents • We do not take tenants in receipt of housing benefit 	<p>Dear xxxx,</p> <p>Thank you for your response to the selective licensing public consultation.</p> <p>I apologise for my delayed response.</p> <p>I note the points you make in your submission. Your comments will be included in our overall decision making process.</p>	<p>Yes GG sent 08/02/16</p>
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	<ul style="list-style-type: none">• We endeavour to select tenants who will get on with each other in that particular HMO and who are of a similar age and mindset• We will turn down a prospective tenant if we feel they are not a good 'fit' or do not meet our criteria• When we offer a tenancy to a tenant we always stress the need for them to respect fellow housemates and neighbours and we go through a list of house rules with them• All our HMOs have super fast broadband, Sky Sports and BT Sports• We endeavour to select tenants who can either walk, cycle or catch a bus to their workplace and do not need to have a car. This means that our HMO tenants require no more parking spaces than an average family in their own residential home and usually our HMOs have plenty of off-road parking. At xxxx, only two out of our six tenants have a car and there is one off-road parking space which means that there is only one car overnight outside this particular property. Please see attached photos taken during November and December 2015 to illustrate this fact• If tenants have visitors who arrive by car, we ask the tenants to ensure that their visitors park sensibly and at xxxx where we only have one off-road parking space we ask that visitors park in lay-bys away from the house, so as not to annoy or upset neighbours• We hold periodic meetings with our tenants to reinforce our expected high standards• We have a good relationship with all our tenants who feel able to contact us at any time if they have any queries or if there are any issues which concern them• We enter the communal areas of our HMOs several times a week to check on standards and this also gives		
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	<p>us an opportunity to chat with tenants; we are therefore 'proactive' and not 'reactive'</p> <ul style="list-style-type: none">• We employ a cleaner who cleans the communal areas of each HMO on a weekly basis, so the properties are always kept internally to a high standard• We employ a gardener for three-quarters of the year, so that the properties are always kept externally to a high standard• We personally ensure that the dustbins are put on the roadside the evening before collection and we return the dustbins to their storage area once collection has taken place, therefore litter is not a problem and we endeavour to ensure it will not be a problem for our tenants or their neighbours• As soon as a problem is reported, for example a leaking tap, we ensure our workmen are on site as soon as possible to repair or renew any item• We have a reliable plumber and electrician and we are very aware of the need for good workmanship to ensure all works within the property conform to current legislative codes of practice• We stress to our tenants that there are to be no more than six persons occupying the house in accordance with the licence for that property• We are members of the Eastern Landlords Association, based in Norwich, who keep us informed of current legislation and we keep up to date with this• We regularly attend NLA meetings in the city, hosted by xxxx, as we wish to keep abreast of landlord issues and responsibilities. This also gives us a chance to chat to other responsible local landlords• Whilst we are pleased that this Consultation is taking place and will improve standards in the city which can only be a good thing, as responsible landlords we do		
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	<p>not wish to be penalised for the negligence of other local HMO landlords</p> <p>We trust that you will take these representations into consideration. Please do not hesitate to contact either of us if you would like to discuss any of the points we have raised.</p>		
13.01.16	<p>Having attended a couple of meetings with the NLA, where members of the City Council have attended and explained the current proposals recently I thought I would make clear my views.</p> <p>My details.</p> <p>I let my properties currently in Peterborough where some fall in and others out of the different selective licensing. So have no real bias to the proposed areas.</p> <p>I understand clearly what is trying to be achieved here, and how the City Council have come to pick these areas (trying to be very analytical and fare) But the areas they have picked (after going through this process) especially Woodston and Fletton just are not warranted (common sense) and should not be included in the scheme. The government looks for 20% selective licensing in areas and the areas that have been picked in Peterborough take it well past this figure. So my suggestion would be to pick what the worst areas are in Peterborough, but keep it to the 20% and see how the scheme goes, as I would expect this to highlight the central area where the worst housing issues seem to be. Then this area can be fixed once and for all.</p> <p>My other concern with the proposed areas, is the bad landlords will just focus more on the areas that are not in the scheme. For instance Paston, Welland, Orton Goldhay,</p>	<p>Dear Mr xxxx</p> <p>Thank you for your response to the proposed Selective Licensing Scheme public consultation. I apologise for the delay in my response.</p> <p>I note your comments in relation the areas selected and in particular the potential for displacement. The areas proposed all came out as those with the multiplicity of issues upon which the Government suggest local authorities can consider introducing such schemes. Not all of those issues are visible. We have considered the issues of the areas in depth and feel that to deviate from the evidence base will undermine the process we have adopted.</p> <p>In respect of your issue around acting as an 'agent' for a friend. We would be unable to make the amendment as you suggest for fear of setting a precedent that would go against the principles of selective licensing.</p>	<p>Yes GG sent 08/02/16</p>

	<p>etc. This will just displace the problem and has the potential to make these areas I have listed much worse than they currently are.</p> <p>My only question or point that is worth thinking about in the detail is. As stated I am a private landlord with my own properties around Peterborough, but look after <u>one</u> friends properties also. Which in essence makes me an “agent” for my friends properties, as this is not really a business its more to help him out and I manage his properties like my own so the trust and service is there on both sides. To do this I have recently had to join the “property redress scheme”, at a further cost to keep within the ever changing laws. With the proposed scheme my friend who is not an accredited Landlord will have to pay full price for each properties in the selective areas. As I only look after mine and my friends properties the costs and time involved to join ARLA as an agent is not viable. The end result of selective licensing would be he would have to leave me managing the properties and pass them to a ARLA letting agent (due to the high cost of the licence), which will not be great for the tenants, who get a great service currently and my friend knows I look after his properties well.</p> <p>Proposal to resolve the above issue I raised and face, is to allow ONE nominated private accredited landlord to act as an agent for ONE person. There must be a way to link to people together, as I am sure this could be an issue within families, etc. I think if you keep it to one linked person this will stop businesses trying to abuse the system. PLEASE CAN YOU COME BACK TO ME ON THIS POINT and ISSUE.</p>	<p>I am sorry that this is not the answer that perhaps you wanted, however we thank you for your considered response.</p>	
13.01.16	<p>Hi</p> <p>Please call xxxx.</p>	<p>Done – see earlier</p>	<p>ES to call Mrs Gordon</p>

	<p>She is a landlord of 2 properties in Peterborough.</p> <p>This is her second request for a response.</p> <p>Her properties are let through xxxx letting Agents.</p>		
13.01.16	<p>To Whom It May Concern:</p> <p>As a landlord of a number of properties in the central area of Peterborough, I write to express my extreme concern about your selective licensing proposals.</p> <p>You must be aware that there is a great shortage of low cost rental properties in the city. This scheme seems primarily a method of raising money for the council, at the expense of good landlords, which will inevitably, lead to increased rents.</p> <p>If you are genuinely concerned that tenants in the city should not be exploited, and be given good quality accommodation, with reasonable rents, then you should focus your concerns on private landlords who do not employ registered, reputable agents.</p> <p>Registered agents by law have to ensure that all properties meet safety standards, that the property is in good order, and that the rights of the tenants are protected.</p> <p>Please reconsider.</p>	<p>Dear Ms xxxx</p> <p>Many thanks for taking the time to respond to the Selective Licensing proposals.</p> <p>SL will allow the council to identify which landlords are aware of their obligations under the law – whether through becoming accredited themselves or using an accredited agent, or simply by becoming licensed themselves.</p> <p>We agree that rogue or criminal agents are part of the problem and that is why we are proposing that either the landlord (through RLA or NLA) is accredited, or that the managing agent is accredited through ARLA (and we shall probably include NALS as an alternative for agents).</p> <p>By law, the scheme cannot make a profit. Nor can it use the money raised for anything other than on the scheme itself, so it cannot be said that it is being run to “fill the council coffers”.</p>	<p>Yes GG responded 08/02/16</p>

		<p>In any event, an accredited landlord (or one using an accredited agent) will only pay £50 for the whole 5 years. We do not consider this financially onerous.</p> <p>Yours sincerely</p>	
13.01.16	<p>Dear Sirs,</p> <p>As a private landlord in the proposed "red" area of the city, I feel I must write to object about your proposals.</p> <p>It seems to me that your proposed scheme is aimed at raising money for the council, primarily from honest, committed landlords who have the best interests of their tenants at heart just as much as their own.</p> <p>Your proposals will mean extra cost and inconvenience for all good landlords, resulting inevitably, in increased rents being charged.</p> <p>There is already an extreme shortage of low cost rental properties in the city, this scheme will NOT improve that situation.</p> <p>There are indeed poor landlords in the area, but I venture to suggest that they do not employ reputable agents, who by law ALREADY have to ensure that all your concerns about landlords are met.</p> <p>It is landlords who do not use reputable agents who need inspection - please consider this seriously.</p>	<p>Dear Ms xxxx</p> <p>Many thanks for taking the time to respond to the Selective Licensing proposals.</p> <p>SL will allow the council to identify which landlords are aware of their obligations under the law – wither through becoming accredited themselves or using an accredited agent.</p> <p>We agree that rogue or criminal agents are part of the problem and that is why we are proposing that either the landlord (through RLA or NLA) is accredited, or that the managing agent is accredited through ARLA (and we shall probably include NALS as an alternative for agents).</p> <p>By law, the scheme cannot make a profit. Nor can it use the money raised for anything other than on the scheme itself, so it cannot be said that it is being run to “fill the council coffers”.</p> <p>In any event, an accredited landlord (or one using an accredited agent) will only pay £50 for the whole 5 years. We do not consider this financially onerous.</p>	<p>GG responded 02/02/16</p>

13.01.16	<p>Hi</p> <p>Please can you not send any further correspondence to xxxx, she has asked to be removed from mailings.</p> <p>regards</p>	No response required.	GG to deal
13.01.16	<p>Good Afternoon</p> <p>I attended the Consultation/Exhibition at The Beehive Centre, and have also completed the on-line survey.</p> <p>My experience of meeting residents – both owner occupiers and tenants in large areas of Park Ward has convinced me that Selective Licensing is essential to combat the decline of many streets in the area.</p> <p>Travels around Park along with Central Ward and areas of East and North Ward demonstrate that once proud neighbourhoods and some streets in particular are often under siege from unruly and anti-social behaviour; unrelenting examples of overcrowding, drug dealing, noisy neighbours, parking of vehicles in unprepared front gardens and on verges, together with a virtual plague of fly tipping.</p> <p>I believe many long term residents are being driven from their homes by the increasing domination of rented properties - incoming neighbours not compliant with reasonable behaviour and uncaring landlords who often have no regard for the problems faced by the community in which their lets are situated.</p> <p>Landlords need to contribute to the solutions available rather than choosing to regard themselves of victims of the proposed legislation.</p>	<p>Dear Mr xxxx</p> <p>Many thanks for taking the time to respond to the Selective Licensing consultation.</p> <p>We value all feedback and have taken note of your comments. We think that displaying plaques may be a step too far from a privacy point of view and could lead to undesirable side effects. However, we certainly do encourage the public to provide information to the Council about anti-social behaviour by tenants or abuse by landlords.</p> <p>We take our responsibility to prosecute in these incidences very seriously as successful and visible prosecution is a great deterrent.</p> <p>We don't consider that the high percentage of private rented houses is a problem per se. In Europe for example renting is far more prevalent. However, where there is fast turnover of residents, poor standards of behaviour and poor property maintenance, this can cause a lack of social cohesion and a</p>	<p>Yes GG sent 08/02/16</p>

	<p>May I propose that to ensure neighbours have recourse to the landlords of adjoining or nearby rented properties when issues arise, that ANY rented property should be required to display on a plate or plaque outside the premises the name and current contact details of the Landlord/Owner and his Agent.</p> <p>This would help ensure a landlord (or the appointed agent) would be engaged in the experiences of nearby residents; in turn taking care to ensure their properties being let to responsible tenants. Tenants would also have a declared access to the landlord, and the authorities better able to manage any churn of ownership.</p> <p>A new mantra for landlords – with ownership there is responsibility!</p> <p>A new mantra for incoming tenants – to be in a community there is an expectation of acceptable behaviour.</p> <p>I do hope my proposal will receive consideration for implementation with the licensing obligations.</p>	<p>general deterioration to an area, and this is precisely what we hope to address with SL.</p>	
13.01.16	<p>Can we please have an urgent reply.</p> <p>Kind regards</p>	<p>Dear xxxx,</p> <p>Thank you for your submission to the selective licensing consultation.</p> <p>I can confirm that the selective licensing proposals do not cover the area of Riseholm, Orton Goldhay, Peterborough</p>	<p>GG sent 29/01/16</p>
14.01.16	<p>Dear All</p> <p>As discussed at the consultation session at the Beehive centre, we are very keen on this for our area: Park Streets Ahead</p>	<p>Dear xxxx,</p>	<p>GG sent 29/01/16.</p>

	<p>Residents Association covers Granville Street, Huntly Grove, Princes Street, All Saints Rd, Queens Drive West, and the parts of Dogsthorpe Rd and Park Rd that touch them, all the way north to the roundabout where Park Rd and Dogsthorpe Rd meet).</p> <p>In my capacity as Chair, I came to the last Scrutiny Committee, having submitted a request to speak in favour of it for our residents. However, no questions were allowed from the public as it transpired, prior to the launch of the larger area plan and this latest round of consultation. Residents are really keen that this should go ahead as we see the degradation of our area and how hard it is to build our community in neighbourliness in the face of poor landlord behaviours which impacts on our shared environment. Tenants and homeowners (and of course resident landlords) are all residents within our association and we think Selective Licensing will be a useful lever to enable improvements.</p> <p>Inevitably, despite strong feelings, not all residents will have input to your survey: please accept the significance of this response as indicating the hugely positive sentiment towards your proposals for our area (and the rest, but we cannot properly speak for those!).</p> <p>We are so keen that we'd like to be informed of progress. I intend to come to the next Scrutiny Committee and would relish the chance to speak in favour - is this still scheduled for 26 January?</p> <p>We'd also really appreciate loan of your excellent display boards that you had in the Beehive Centre to facilitate your consultation - they would be great to showcase our work at our AGM in March - would it be possible to borrow them??</p>	<p>I write in relation to your submission to the Selective Licensing Consultation. I note your comments.</p> <p>I apologise for not responding earlier; the large number of detailed responses we received towards the end of the consultation has resulted in delays in our responses.</p> <p>The matter was debated at the Strong and Supportive Communities Scrutiny Committee meeting held on 20th January. The matter will now progress through the Council's internal governance before a final decision is made whether to send the matter to the Secretary of State for approval.</p> <p>Yours sincerely</p>	
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14.01.16	<p>Dear Sirs,</p> <p>I write in response to the recent proposal by Peterborough City Council to introduce Selective Licensing in certain parts of the City of Peterborough. As you will most probably be aware, that the Peterborough City Council set up a small working group to seek alternative proposal to the SL after they discovered that vast majority of people are against the SL after the public consultation. I was member of that working group and we had dozens of meeting not only among ourselves but also with legal profession people, landlords, managing agents and indeed with City Council officers. We draw up alternative proposal with full consultation with the council officers involved for SL and presented to the relevant councillors including the Council Leader at a meeting at the Town Hall and again at Bayard Place. It was agreed by all concerned parties that it is a better way forward than the proposed scheme by the council. We were informed that we will be notified after legal and other consultation. This was in response to the initial proposal which was canvassed in 2013 and was limited to a smaller part of the City and seen as targeting the Central Ward and East Ward areas of the City. Given the response to the consultation at that time it was quickly recognised that the scheme being proposed then was not workable.</p> <p>. There was initial acceptance of the proposal and it was recognised that the proposal would need tinkering with but the gist of what was being proposed was acknowledged as being a very good starting point. The group waited in anticipation of receiving feedback from the council but nothing</p>	<p>Dear Mr xxxx,</p> <p>Thank you for your submission to the Selective Licensing consultation process.</p> <p>Having considered the points you raise I respond as follows:</p> <p>The Council draws a significant distinction between the proposals first uttered in 2013 and those that are current. A different approach to compiling and assessing the evidence was undertaken which resulted in identifying those areas which may benefit from the introduction of selective licensing. Those areas are much broader than before and the evidence is much more concise. In addition the council took the view that it would seek to introduce the scheme in only those areas of most evidenced need. It decided that it would look to introduce a scheme only in those areas that met at least five, or all six, of the categories set out by government. This is a high threshold and the fact that 37% of the cities private rented stock is included is an indication of the problems that are faced.</p> <p>The Council does not suggest that selective licensing on its own would bring about the large scale change that is needed. Thus, we are continuing with the Cumulative Impact Policy which prevents an increase in premises licensed to sell alcohol in the areas, we are looking to introduce a Public Space Protection Order that is coterminous with any finally agreed selective licensing boundary and we setting up a joint prevention and</p>	<p>Yes GG sent 08/02/16</p>

	<p>was heard for over a year and then we heard news that the same proposal was being pushed forward. After some further meetings with officers assurances were given that the same scheme would not be proceeded with but instead given that there was a change in the rules and regulations governing selective licensing in April 2015 it was indicated that a new scheme would be introduced covering a wider area and also that the scheme would require the approval of the secretary of state.</p> <p>WE maintain the position that selective licensing is not the solution to the problems that have been identified in the recent consultation and the evidence presented in justification of licensing. I feel that only by working with and educating the majority of landlords the problems could be eradicated. There is no evidence that any of the problems that have been identified are connected to private rented housing and similarly there is no evidence that selective licensing will deal with the problems identified. If the condition of properties is an issue then the council have plenty of existing powers to deal with this. They do not need selective licensing. There is nothing in the proposal which deals with the behavior of tenants which is half of the problem. Unless something is done to deal with the bad tenants nothing will change.</p> <p>I therefore suggest that the best way forward is to have a voluntary scheme which was proposed previously and for the council to tackle bad landlords by targeting inspections and enforcement. Selective Licensing has been around since the Housing Act 2004 and a large number of local authorities have introduced selective licensing particularly since the advent of general consent in 2012. However, the number of prosecutions bought by local authorities is relatively small suggesting that</p>	<p>enforcement team to tackle issues of community concern at the earliest possible point.</p> <p>We will be introducing training for landlords and for tenants in order that both are made aware of their respective roles and responsibilities. We consider the proposed fee structure will encourage more landlords to become accredited with a range of national bodies thus demonstrating their desire to do the right thing.</p> <p>We believe that introducing a selective licensing scheme will allow the council more opportunity to prioritise our enforcement activities against those landlords who try and evade dealing with things in the right way. Above all we believe it will raise housing standards across the valuable private rented section resulting in an improvement in the quality of life not only for the tenants but for all who live in the area.</p> <p>We have considered a number of options available to us including the introduction of a voluntary scheme. We believe the situation in Peterborough requires a whole system solution and the measures outlined above can be best delivered as part of an overall community improvement plan. Improvement in housing is central to that plan and thus we feel it best delivered by central council leadership.</p> <p>We do not consider that designing and introducing a voluntary scheme that would replicate an existing, nationally run and respected accreditation system would be one that we would wish to pursue. The RLA and NLA provide nationally recognised standards that are easily referenced and measured. We therefore do not consider a voluntary scheme appropriate for Peterborough at this time.</p>	
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	<p>either the problems that are identified to justify licensing are not there or there is a lack of resources on the parts of local authority when it comes to enforcement.</p> <p>In the circumstances I forward the proposal that was put to the council last time for your further consideration. I would welcome any observations that you may have as I recognise that there may be room for improvement. However, the concept of a voluntary scheme has been advocated many groups and organisations and even the DCLG Guidance suggests that voluntary schemes are preferable. In fact there is a voluntary scheme operating in the Paige Hall area of Sheffield which was to run for a period of 2 years. This encourages landlords to self evaluate against a particular standard and register with the council. The landlords are required to carry out a check of their properties and where the standards is not met to carry out necessary improvements. This leaves the council to carry out targeted enforcement and take action against the rogue landlords but the council are free to inspect these properties and see if standards are being met. This is the same concept that I would advocate and am willing to meet and discuss further with you.</p>		
14.01.16	<p>Sir,</p> <p>I have reviewed your revised proposal on Selective Licensing of Private Landlords in various areas of the city and feel that once again I have to make serious comment against it.</p> <p>I am the landlord of a 2 bedroom semi-detached house in the affected area. The house was built in 2007 and is modern and</p>	<p>Dear Mr xxxx</p> <p>Thank you for your response to the selective licensing public consultation. I apologise for my delay in responding.</p> <p>This consultation began by assessing the whole of Peterborough. The city (like the rest of the UK) is broken down into small areas called Lower Super Output Areas. Government guidance states that we can, by law, select only those areas</p>	<p>Yes GG sent 08/02/16</p>

	<p>in good order. It is in a quiet cul-de-sac where there has been no anti-social behaviour whatsoever.</p> <p>I use a reputable Property Maintenance Company to run the let so that I get decent tenants and those tenants, in return, get everything they should have in line with current legislation and all of the elements in the proposal, viz a tenancy agreement, annual gas appliance certification etc, etc.</p> <p>Your proposal is based on six criteria:</p> <p>An area of low housing demand.</p> <p>An area which is experiencing a significant and persistent problem caused by anti-social behaviour.</p> <p>Poor property conditions.</p> <p>High levels of migration.</p> <p>High levels of deprivation.</p> <p>High levels of crime.</p> <p>Firstly I would suggest that the areas are not one of low housing demand. Any decent property that comes onto the market is snapped up in double quick time. I would agree that there are pockets within the areas that are not up to scratch but that can be said for other areas not perceived as 'difficult' and not included in the designated areas.</p> <p>As regards anti-social behaviour I fail to see how Private Landlords can be held responsible for this. Indeed I would go</p>	<p>that have in excess of 19% of their housing stock in the private rented sector (PRS). The Government will not allow city-wide implementation of Licensing.</p> <p>Some areas that you might expect to be included in Selective Licensing have high numbers of properties owned by Housing Associations, who are subject to existing legislation, and the PRS is therefore below 19%.</p> <p>The next step in selecting areas was to consider the six criteria set out by the government in their revisions to the Housing Act, which you have identified.</p> <p>PCC analysed the LSOAs that had 19% PRS, and chose only those areas that were above the Peterborough average in at least five of these six criteria. The areas were selected on the data only. This is a robust process and one which has allowed us to take a purely evidence-based approach.</p> <p>We understand that private landlords are not responsible for much of the anti-social behaviour and that is why SL must work in conjunction with other measures. As the consultation information has stated, we shall be introducing Public Space Protection orders (to prevent anti-social behaviour in the street) and updating the Cumulative Impact Policy (to stop the proliferation of off-licences).</p> <p>However, we also know that some landlords do not use formal tenancy agreements and therefore have a lack of legal redress if their tenant is not fulfilling their obligations. Part of the SL proposals therefore is to offer training to both landlord and tenant to ensure that both sides' obligations are understood.</p> <p>Whilst SL does not impose a higher legal obligation on the landlord, it does bring together all the various pieces of</p>	
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	<p>so far as to say that I believe that most of the anti-social behaviour in these areas is as a direct result of the Council's current policies on the licensing of Fast Food Outlets and Off License Premises, particularly on Lincoln Road but not solely confined to that area.</p> <p>To blame the anti-social problems of modern society solely on Private Landlords is an abomination.</p> <p>I live not far from Tait House where the crime rate, according to the Police web site, is the highest in Peterborough. Perhaps the Council should spend more time with the Housing Agency that runs this youth hostel in an attempt to reduce the nuisance problems and anti-social behaviour that it generates.</p> <p>No Landlord in his right mind would enter into a tenancy agreement with someone who he thought might express anti-social behaviour. These are the sort of people who tend to trash properties and leave when in arrears with the rent. This is not the way to run any property rental business.</p> <p>Poor property conditions in the areas are not solely confined to rented properties. Indeed, many privately owned houses are significantly worse than the majority of rented ones. But the proposal ignores this fact.</p> <p>And as for high levels of migration this is a governmental problem given the free movement of EU citizens. It is entrepreneurial Landlords who are reacting to fill the housing needs this demand generates as the Government and Local Authority do not seem to want to act on this in any way.</p>	<p>legislation into one place and allow the council to identify those that are more likely to be acting illegally.</p> <p>Our proposed licence fee structure imposes a minimal £50 cost to those landlords that are accredited (or use accredited agents) and can therefore be presumed to understand their legal obligations. This fee does not constitute a material impact to the investment decision of a responsible landlord, and we find it hard to understand how you could justify increasing your rent through an effective £10 per year.</p> <p>An unaccredited landlord – in other words, one who cannot demonstrate that they are up to date in terms of legal obligations such as Legionella testing etc. – will be asked to pay £600 per property. This pricing structure is specifically designed to encourage accreditation.</p> <p>Asking landlords to demonstrate their understanding of the legal obligations involved in providing shelter and warmth to those prepared to pay for it does not, in our view, impinge upon a landlord's Human Rights.</p>	
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Finally we come to high levels of deprivation and crime. How these two social ailments can be placed at the feet of private Landlords completely escapes me. As I have previously stated the anti-social behaviour that generates crime is as a direct result of the Council's policy on alcohol sales licensing. It is not something private Landlords are responsible for.

I believe that there is already sufficient and adequate legislation for the Council to crack down on rogue Landlords and that the proposed scheme is an unwanted and unnecessary level of bureaucracy on the vast majority of decent ones.

The Council already has the powers to deal with non-compliant Landlords. What the Council does not appear to have is the appetite to allocate funds to pursue these and is looking to those compliant Landlords, who give their tenants everything demanded by law, to pay for action against the tiny majority who do not.

What a nonsense.

This is akin to making every law abiding football supporter pay for a license to attend matches so that funding can be generated to pursue the small minority of football hooligans. Such a scheme would be laughed at, a fate that this ridiculous proposal also deserves.

Should this abominable Licensing Proposal be implemented all it will do is to force me to increase the rental for my property in order to cover a charge by the Council which brings no tangible benefit to either my tenant or me. And you should remember that as the Property Management Company takes a

	<p>percentage of the rent, and I will be forced to pay the charge out of taxed income, I will have to ask my tenant for somewhere in the region of 50% more than whatever the Council charges me in order to fund the fee. This is a complete nonsense and manifestly unfair.</p> <p>Finally in my opinion the whole scheme is unjust anyway. In the Council's consultation document you state, 'We acknowledge that many Landlords provide decent and well managed and well maintained accommodation, which does not cause any problems for the local community'.</p> <p>I would assert that the Council's decision to impose a blanket charge on all Landlords, rather than just those who do not meet current legislation requirements, means that they consider every Landlord to be culpable. This is in direct contravention of Article 6 of the European Convention on Human Rights which states that everyone is to be presumed innocent.</p> <p>This ridiculous and unnecessary proposal should be consigned to the bin forthwith.</p>		
14.01.16	<p>To whom it may concern,</p> <p>Please find attached the RLAs response to Peterborough City Council's consultation proposing a selective licensing scheme.</p> <p>If you have any further questions about our submission please don't hesitate to contact me.</p> <p>Many kind regards</p>	<p>I write formally in response to the RLAs submission as part of Peterborough's Selective Licensing Scheme consultation. I can confirm that your submission is formally included as part of our consultation process.</p> <p>I will deal firstly with the specific issues you raise before moving to your proposals for a co-regulated scheme.</p> <p>The first section of your letter outlines the RLAs general concerns about licensing. We note these general concerns. We hope however, that the proposals for Peterborough negate to some extent at least some of those concerns. We are seeking</p>	GG responded 02/02/16

		<p>to introduce a fee structure that deliberately encourages more landlords to become members of national bodies. The RLA is one of those bodies. Membership would provide the landlord with a total one-off fee of £50 for the five year license. We take the view that those landlords who are members of national bodies are demonstrating their intention to do the right thing. We are introducing training for landlords and tenants in order that they both understand their roles and responsibilities. We have, or are looking to introduce, a range of other initiatives to improve the areas such as a Public Space Protection Order, alcohol cumulative impact policy and the introduction of a joint prevention and enforcement team.</p> <p>Moving to your specific objections to the Peterborough scheme:</p> <p>You mention the Governments Housing and Planning Bill. This is something about which we currently have no timetable for possible enactment. In view of what we consider to be acute issues within Peterborough we feel we need to act now and it would be inappropriate for us to wait for the progress through Parliament of such potential legislation.</p> <p>You raise concerns about our licensing conditions in as much as they affect electrical safety, energy efficiency, property management and fire safety. We believe the proposed conditions will improve the safety of our City's tenants and ensure landlords take a more active involvement with their properties than many do at present.</p> <p>In relation to anti-social behaviour we acknowledge that landlords are limited in their ability to deal with these issues. Thus we are introducing training for landlords and tenants, we are looking to introduce a public space protection order that is</p>	
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		<p>coterminous with any final selective licensing boundary and we are continuing with our cumulative impact policy that restricts the number of premises licensed to sell alcohol within the areas. In addition we have listened to the responses received through consultation and are amending the proposed condition which sought references on all tenants and their involvement in ASB. This will be restricted to references that ask whether the tenant was involved in any ASB at or in connection with their previous tenancy. Our joint prevention and enforcement team proposals also allow us the opportunity to join police, local authority and other agencies together to provide much more directed activity to combat ASB and our housing teams will seek to work with landlords to support them in dealing with difficult tenants. The condition that tenancy agreements should be in place on all occasions we believe will also assist in this area.</p> <p>Moving to the size of the designated area. We are seeking to introduce selective licensing only in those areas that meet at least five or all six of the conditions that legislation allows local authorities to consider. We believe this to be the most comprehensive set of criteria anywhere in the country. The fact that use of that high burden still affects 37% of the City's PRS is indicative of the issue we face. We believe this is a targeted response that covers only those areas in need.</p> <p>The issue of fees and training is something that I have covered elsewhere within this reply.</p> <p>In relation to on-going monitoring; the council will be monitoring the impact in the scheme and reporting regularly in public to the Strong and Supportive Communities Scrutiny Committee.</p>	
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		<p>Moving on to co-regulation. We acknowledge that co-regulation is an option available to us. Having considered this, at this stage we intend to continue with our proposals based upon a Council lead.</p> <p>Yours sincerely</p>	
14.01.16	<p>Dear Sirs</p> <p>Thank you for your email. It is assumed that notwithstanding the statement in your email below, a proper and considered response will be received to the email sent yesterday.</p> <p>The DCLG guidance issued in March 2015 to local authorities considering selective licensing in the private rented sector (paragraph 48) states that "Consultees should be invited to give their views and these should all be considered and responded to". In the circumstances it is expected that a considered response will be received from the Council in line with the guidance.</p> <p>Yours faithfully</p> <p><u>Response to Proposed Introduction of Selective Licensing Scheme in parts of the City of Peterborough.</u></p> <p>I write on behalf of Communities Against Selective Licensing (CASL) in order to make representations in response to the Council's latest proposals to designate selective licensing in certain areas of this City. A similar proposal was made a couple of years ago but this time the area subject to designation has been enlarged to take account of the legislative changes made</p>	<p>Dear Mr xxxx,</p> <p>Thank you for your response to the Selective Licensing consultation process.</p> <p>I note your nine points and conclusion and respond to each of them individually as set out below. :</p> <p>1 The concept of Selective Licensing and its implications. The Housing Act 2004 sets out the legislation that enables local authorities to consider the introduction of a Selective Licensing Scheme. It is inappropriate for me to comment in detail about the concept of legislation passed by the Parliamentary process. All legislation is subject to due scrutiny prior to its inception and thus the very fact that the legislation is in force tends to set out the need and concept of that legislation itself. However, it is the view of this council that the introduction of a selective licensing scheme, when taken together with a range of other initiatives, will drive up the quality of life in some areas of the City where there is an evidenced need for improvement. We acknowledge the point you make about costs being passed onto tenants, however it is our view that the scheme strongly supports landlords to become accredited members of a range of national bodies and thus take advantage of a one-off fee of £50 per property for the full five-</p>	<p>GG responded 02/02/16</p>

	<p>in April 2015. CASL responded to the previous proposal with concerns regarding certain aspects of that proposed scheme and I regret to say that these concerns have not been alleviated by the current proposals. I therefore repeat the concerns with the current proposal as follows:</p> <p><u>1. The concept of Selective Licensing and its implications.</u></p> <p>CASL is concerned about the whole concept of selective licensing because of the bureaucracy and associated cost of administration and implementation. Much of the effort will be devoted to the process of licensing individual landlords, collecting in and processing applications, issuing licenses and so on. The good landlords will then have to pay for the cost of finding those who do not apply, following this up and ultimately taking enforcement action against them. All of this will be time consuming and resource intensive, diverting the limited resources away from tackling the real issues in the areas concerned. Considerable sums of money relative to rents have to be spent in fees which would be better devoted to improving individual properties, an issue to which I will return below. Ultimately the costs will fall on the tenants as they will inevitably be factored into rents. This raises issues of affordability for tenants particularly at a time of housing benefit cut backs in areas where private rented sector tenants are significantly assisted financially through local housing allowance.</p> <p><u>2. Control of Anti-Social Behaviour (ASB).</u></p> <p>The Guidance issued by the DCLG tells local authorities that in order to make a designation based on anti-social behavior they will need to establish that the problem Landlords are not responsible for the behaviour of their tenants unless they have authorised that behavior and accordingly attempting to impose</p>	<p>year license. This equates to £10 per year. Those who choose not to become accredited will be subject to a £600 fee, this equates to £120 per year or £10 per month. The fees are fully tax deductible. It is our contention that to offer such discounts will encourage more landlords to become accredited and thus immediately drive up standards.</p> <p>2. Control of Anti-Social Behaviour.</p> <p>The Council does not seek to rely upon anti-social behaviour alone as its evidence base for selective licensing. The council seeks to introduce selective licensing ONLY in those areas that meet at least 5, or indeed all 6, of the conditions set out by government upon which we can rely in considering the introduction of such a scheme. We believe that such an approach has identified only those areas that have deeply entrenched and interwoven issues that selective licensing can help to address. The introduction of tenancy agreements as a licensing condition itself will set out very clearly the responsibilities upon landlords and tenants in relation to anti-social behaviour. We have removed a proposed condition that landlords seek references which included specific evidence of any involvement by a prospective tenant in any previous anti-social behaviour because it would be impractical for landlords to seek that level of information, we have revised this to references that include any previous anti-social behaviour connected with that tenant at their previous property. In addition we will be launching training for landlords and tenants shortly to make the issue of anti-social behaviour and the respective responsibilities very clear. We are also embarking upon the creation of a joint enforcement team which will increase our ability to resolve anti-social behaviour issues and they will be available to assist landlords and tenants in such issues. Finally, we will be looking to introduce public space</p>	
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	<p>a licensing scheme on them to resolve anti-social behavior will not work as the landlords do not have any powers to deal with ASB. The expectations intended to be placed on landlords in the above areas under this scheme go unreasonably beyond what can be expected of landlords with limited resources. For instance the taking of legal proceedings against the tenants is an unreasonable expectation and a totally unrealistic approach in practice. Landlords have to rely on discretionary grounds to evict tenants and it is notoriously difficult to make a judge grant an order for possession on discretionary grounds. Landlords are also faced by problems of gathering evidence and getting people to come to Court. What you need to appreciate is that you, as one half of the state, i.e the Council are castigating landlords for failing to take action but another arm of the state, the Legal Aid Agency, then gives individual tenants funds to defend these claims based simply on denials from tenants saying that things never happened as alleged. To compound the situation, win, lose or draw the landlord has to stand his own costs because not only does the state pay to defend the tenants but also says that the landlord cannot recover his costs of doing so from the tenant even if the landlord is successful. It is not right therefore to expect landlords to monitor and police ASB on the part of their tenants in the ways you have suggest.</p> <p>A 2013 House of Commons briefing note (“Anti social neighbours in private housing” (2013) House of Commons Library) states, “...As a general rule, landlords are not responsible for the actions of their tenants as long as they have not authorised the anti-social behavior. Despite having the power to seek a court order for eviction when tenants exhibit anti-social behavior, private landlords are free to decide whether or not to take action against their tenants. The question of whether a landlord can be held liable for the</p>	<p>protection orders, coterminous with any final selective licensing boundaries, these will give all officers increased ability to deal with anti-social behaviour.</p> <p>3. Assessment of low housing demand.</p> <p>As with Anti-social behaviour, the council does not seek to rely solely upon low housing demand as the reason for introducing selective licensing. The layered approach we have taken and the high threshold we have adopted indicates those areas in most need arising from a complexity and multiplicity of issues. It is our contention that such a scheme, together with other measures, will improve the quality of life and with resultant improvements in the economic and social conditions within those areas.</p> <p>4. Outcomes and monitoring.</p> <p>We note your comments in relation to this. The council will undertake robust outcome monitoring and updates will be reported the Strong and Supportive Communities Scrutiny Committee at intervals they see fit. These will be publically available reports presented at meetings held in public.</p> <p>5 (there is no point numbered 5)</p> <p>6. Displacement effect.</p> <p>We note your comments in relation to this. This is something that the council is alive to. It is something about which officers have questioned by the Scrutiny Committee at all stages. We will be closely monitoring all areas of the City to pre-empt any displacement and taking pre-emptive action where necessary in order to prevent exactly the type of issues that have resulted, in our view, in the need for the scheme.</p>	
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	<p>nuisance of its tenants has been considered in a number of cases.” The paper continues, “...It is established that no claim can be sustained in nuisance where the nuisance is caused by an extraordinary use of the premises concerned, for example by the tenants being noisy or using drugs on the premises. The rationale behind this approach is that it is up to the victim of the nuisance to take action against the perpetrator. To found an action in negligence against a landlord the victim must show that there has been a breach of a duty of care owed by the alleged perpetrator.”</p> <p>The briefing paper also notes the court decision in the case of O’leary v London Borough of Islington in which, “...it was held that a term to enforce nuisance clauses could not be implied into a tenancy agreement. This indicates that landlords cannot be sued for breach of contract unless there is an express term in the tenancy agreement that obliges him or her to “take all reasonable steps to prevent any nuisance.” Even where such a clause exists, the courts have been reluctant to find the landlord in breach.”</p> <p>The Guidance issued by the DCLG tells local authorities that in order to make a designation based on anti-social behavior they will need to establish that the problem is directly attributable to the behaviour of their tenants. However, if we look at the evidence document produced by the Council, although this contains a data recorded crimes, alcohol related incidents, drugs related offences, number of needle finds, graffiti, fly tipping and accumulations of rubbish, there is no evidence that these incidents are being caused by privately renting tenants or is in any way linked with the private renting sector. Unless the Council is able to demonstrate that there is significant evidence that ASB is committed by privately renting tenants, the mere presence of such activity no matter how substantial it is does</p>	<p>7. Denigration of the selected areas.</p> <p>It is our belief that the introduction of the scheme, together with our other initiatives, will improve areas rather than lead to their decline. Our aim is simple: to improve the quality of life in the designated areas. We would simply not consider the introduction of such a scheme where this not to be our belief.</p> <p>8. Housing Conditions.</p> <p>Housing conditions are one element that councils are able to rely upon. In Peterborough’s case this is not relied upon on its own and the evidence document makes it clear that only areas which meet at least five or all six of the conditions are being considered for licensing.</p> <p>9. Conditions, their legality, and the burden and expense of compliant.</p> <p>We note your comments in relation to this. We have considered our proposed conditions carefully and have amended some as a result of consultation. A summary of those variations can be found within the papers submitted to the Strong and Supportive Communities Scrutiny Committee and are available at www.peterborough.gov.uk We believe our conditions are fair, are reasonable and in most cases are simply those that are required by law. The cost of complying with conditions that should in any case be already in place through existing legislation is a matter entirely for those landlords whose properties do not meet the standards which by law they should already meet.</p> <p>10. The fees, fee structure and projected budget.</p> <p>A wide variety of comments have been made so far about the fee structure formally in writing and verbally at</p>	
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	<p>not constitute a legitimate reason for introducing a selective licensing scheme. The proposal must be based on solid evidential footing with robust empirical data that links incidents to privately renting tenants, not on myths, perceptions and mere assertions which this scheme is based upon. In addition there is a requirement that making the designation must lead to a reduction or elimination of anti-social behavior. However, the proposal by the Council contains no evidence whatsoever, that anti-social behavior will be reduced or eliminated.</p> <p>Not only does the evidence document not make any link between the incidents of anti-social behaviour and private rented housing it also does not take into account or differentiate between incidents that may be caused by social housing tenants and other tenants. There are a large number of social housing properties in the area and it is very surprising that this element has not been accounted for or differentiated in the evidence document. There is therefore no way of being certain that the anti-social behaviour that is alluded to in the evidence document is in any way linked to the private rented sector.</p> <p><u>3. Assessment of “Low Housing Demand”</u></p> <p>Section 80 (4) of the Housing Act 2004 sets out some of the factors that must be taken into account when deciding whether an area is likely to become an area of low housing demand. One of the factors that has been considered in the evidence document is the value of properties.</p> <p>Although the Council has undertaken some form of statistical research based on land registry data with regard to capital values it has not undertaken any research with regard to rental values. The Housing Act does not specify “capital values” only but merely states “values”. As the issue being dealt with</p>	<p>various meetings. Comments ranged from the differential between the lower ‘accredited’ level of £50 and the ‘non-accredited’ level of £600 being too great, to it being too small. There was a level of misunderstanding as to whether this was an annual fee or a ‘one-off’ payment. There were also suggestions that it could be a staged process rather than a single up-front payment.</p> <p>The issue of the fee structure is something that has exercised officers considerably. Legislation allows authorities to charge a fee structure in order to administer and run the scheme. The proposals to introduce a scheme in Peterborough are wholly to raise the standard of some of its private rented housing sector for the benefit of all. The fee structure has thus been based upon the principle that those landlords who demonstrate that they meet nationally approved standards receive significant discount; thus the lower level of fee. This is a deliberate action aimed at encouraging as many landlords as possible to become accredited or have their properties managed by nationally accredited letting agents. The cost of becoming an accredited landlord in all cases is less than the differential between the discounted fee of £50 and the base level of £600. Some landlords will not want to join nationally accredited bodies perhaps for reasons of time constraint, out of principle or for other reasons; the £600 fee we believe is reasonable in these cases; it equates to £120 per year or £10 per month. All fees are fully tax deductible. Those who fail to apply to licence within the first three months forgo their option of lower fees and will be required to pay £900 for a licence. Again, this is a deliberate policy to try and ensure licensing of rented property is made in a timely manner. A potential local accreditation scheme may be</p>	
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	<p>concerns landlord licensing it is reasonable to assume that this would include rental values as selective licensing concerns itself with the renting of properties. Given the growth of the rental sector identified in the proposal, the council has omitted a substantial part of the valuation evidence from its research and therefore the proposal document presented is seriously flawed as a matter of law. If the Council has this evidence, it has not produced it as part of the evidence document. Our view is that rental values are essential in considering areas to be designated on the basis of low housing demand.</p> <p>A local authority cannot make a designation simply on the basis of low demand, unless it considers that the designation will lead to improvements in the economic and social conditions of the area. This is the second part of the low housing demand condition set out in section 80 (3) of the Housing Act and this shows that a case for designation is not made out by simply proving evidence of low housing demand. In addition evidence is required that the introduction of selective licensing will lead to improvements in the economic and social conditions of the area.</p> <p>Apart from some cursory statements no evidence is provided as to how designation will lead to improvements in both the economic and social conditions. For example will designation lead to an increase in the values of properties in the selected areas? Will people living in the selected areas become financially better off as a result of selective licensing? CASL doubts very much. There is not a shred of evidence that selective licensing will lead do anything of the sort.</p> <p><u>4. Outcomes and monitoring.</u></p>	<p>developed in the future which landlords can join, which would follow on from selective licensing.</p> <p>As a result of the consultation we have considered carefully whether we should reduce the lower level of fees to zero in order that accredited landlords receive no additional financial burden. The level of administration to support the scheme, even if all were subject to the lower fee, is such that to do so would make it financially unviable unless the upper fees compensated accordingly; we do not feel that to increase the upper fee is appropriate. We consider the £50 lower fee level, which equates to £10 per year per property, is appropriate to cover administrative costs.</p> <p>We have further considered the option of staged payments. The administrative burden that this would place upon the council, together with the effect upon a costing model predicated upon early fees, would necessitate a higher fee structure across all levels. We do not feel that increases in all fee levels would be welcomed. Whilst the scheme will undoubtedly provide landlords with an immediate financial burden, we do not feel that the £50 burden per property is too onerous and reiterate that the ethos of the scheme is to raise standards and thus encourage as many as possible towards national accreditation.</p> <p>I will ensure that an anonymised version of your consultation and my response thereto is brought to the attention of the members of the Strong and Supportive Communities Scrutiny Committee in line with the discussions and recommendations made at the committee meeting of 20th January 2016.</p>	
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	<p>Although the proposal identifies around a dozen or so benefits that it is hoped the scheme will provide there is no evidence as to how selective licensing will bring these benefits about. Clearly there must be effective monitoring as to the success or otherwise of this scheme. In CASL's view, the council needs to put in place a proper scheme of monitoring agreed with the various stakeholders setting out the various measures which will indicate whether or not the scheme is successful e.g impact on property values, reduction in the length of time properties are empty, the reduction in the turnover of tenants etc. The council will need to identify "control areas" so it could then compare the performance in the areas that are subject to selective licensing against a comparable area to enable it to better judge the results of the scheme. This is a significant omission in CASL's view.</p> <p><u>6. Displacement effect.</u></p> <p>The risk of the effect of possible displacement of both landlords and tenants is not referred to or considered in the documentation. If you are an unsatisfactory tenant knowing that you will have to furnish a reference what do you do? You go to an adjoining area where you do not have to provide a reference but can obtain a property at the same rental level. If you are an unscrupulous landlord you could easily purchase a property in an adjoining area such as Paston or Welland for a similar price or even cheaper where licensing does not apply. These are risks which the council has not considered at all in its consultation and evidence document.</p> <p><u>7. Denigration of the selected areas.</u></p> <p>There is a very real concern that as the scheme involves drawing red lines around certain areas of the City, this tells not only the</p>		
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	<p>residents in those areas but the wider world that this is a problem area. This leads to a lack of any investment in the areas and people moving out of the areas leading to the areas becoming “ghettos” which is the exact opposite of what is intended by the scheme. At the moment the state of the mortgage lending market is masking the potential downside. There are currently plenty of reasons for mortgage companies to justify not lending money at the moment without having to worry about specific areas which are subject to selective licensing. In fact there are reports that lenders such as NatWest and Royal Bank of Scotland have a policy of not lending in areas where selective licensing schemes have been introduced. This is a risk that has not been recognised or considered by the council in this proposal.</p> <p><u>8. Housing conditions.</u></p> <p>Reference is made in the proposal to problems regarding the housing stock condition. The poor condition of housing does not of itself give rise to grounds for imposing licensing and this is clearly stated in section 90 (5) of the 2004 Act. Indeed such matters fall to be dealt with under the Housing Health and Safety Rating System (HHSRS) set up under the 2004 Act and it is these powers that should be used for such purposes not selective licensing.</p> <p><u>9. Conditions, their legality, and the burden and expense of compliance.</u></p> <p>A further concern with the proposal is compliance with conditions. The local authority has not appreciated the total costs associated with compliance and the impact on landlords particularly when this is added to the license fee. Excessive regulation will shrink the private rented sector because of the</p>		
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	<p>disincentives it creates for potential investors. The claim that tenants benefit from more regulation and controls needed to raise standards is misplaced. In fact the opposite is the case as such regulation will discourage the better landlords from investing. Less investment will lead to poorer housing quality and it is the increase in investment in the private rented sector which has been the driver of rising housing standards and not regulation.</p> <p>The terms of a number of the conditions proposed to be attached to Licenses (as set out in the proposal documents) are either irrational or plainly wrong following the Decision of the First-Tier Tribunal (Property Chamber) made on 26 June 2014 in the case of Brown v Hyndburn Borough Council (Case Reference: MAN/30UG/HML 2014/0001). In that case the Tribunal removed a number of the conditions attached to a license and varied others following an appeal by Mr Brown challenging the conditions subject to which the license was granted. The Council in that case had adopted a blanket approach towards the license conditions instead of taking into account the circumstances of individual properties. This Council has done exactly the same and the conditions in the Brown case bear a striking similarity to the conditions being proposed by this Council. In the Brown case one of the license conditions dealt with the production of Energy Performance Certificates (EPC) and read "If the house is legally required to have an Energy Performance Certificate then it must be produced to the Council". The Tribunal decided that there was no good reason for this provision to be included in the license conditions and removed the condition from the license conditions. Regulations require production of an EPC at point of letting or sale of a property. Non-compliance with this requirement attracts a civil penalty; non-compliance with a license condition would evoke a</p>		
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	<p>criminal sanction when the requirement had little to do with the management or use or occupation of a property. Peterborough City Council's proposal contains a similar condition which states that "The License holder must provide the Tenant (with a copy of the EPC) and must supply a copy to the Council within 7 days of request." This condition should be removed as it would be unnecessarily burdensome and would introduce a potential criminal sanction when otherwise a civil penalty applied for failure to provide information that is in any event readily available to any interested party and in the public domain on www.epcregister.com.</p> <p>In the Brown case there was a further condition requiring the license holder to have and to produce an electrical installation condition report. The Tribunal determined that a local authority could not in the absence of legislative requirement impose a condition requiring the production of an electrical condition report and removed the condition from the license conditions. This is a matter that comes within the scope of part 1 of the Housing Act 2004 and is consequently a matter for HHSRS assessment. There is no legislative requirement for landlords to produce electrical condition reports and this requirement is not part of the mandatory conditions and does not fall under the definition of management. Peterborough City Council in its proposed license conditions contains a similar requirement regarding an electrical condition report for the property and following the Brown case this condition should be removed.</p> <p><u>10. The fees, fee structure and projected budget.</u></p> <p>Ignoring the discounted fee for accredited landlords or those landlords who place the management of their properties in the hands of accredited agents, the proposal contains an indicative fee of £600 per property over a 5 year period. As you will no</p>		
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doubt be aware the decision of the Court of Appeal in the case of Hemming Limited v Westminster City Council has radically altered the landscape so far as fixing fees for regulatory authorisations such as selective licensing. This case looked at the way in which the European Services Directive (ESD) operates to curtail the manner in which domestic UK legislation (such as the Housing Act 2004) provides for fees to be charged by local authorities to landlords for such licenses.

When setting licensing fees the following principles should now apply:

- a) The Council cannot include the costs of enforcing the licensing scheme against unlicensed landlords in the license fee. This is prohibited by the ESD.
- b) A council can only charge for selective licensing for; (i) the actual and direct administrative costs of investigating the background and suitability of the landlord applicant and (ii) the cost of monitoring the compliance by licensed landlords with the terms of their licenses.
- c) Fees must be reasonable and proportionate.
- d) Under the ESD the fee must not exceed the cost of the authorisation procedures and formalities together with the monitoring costs (for licensed landlords)
- e) The council can require an application to be accompanied by a fee fixed by the local authority. This is provided for under the Housing Act 2004 which stipulates that the council, in fixing the fee, may take into account all costs incurred by the authority in carrying out their licensing functions. Importantly, however, the ESD curtails these powers.

- f) Surpluses and deficits for previous years in relation to permitted elements for which a fee can legitimately be charged can be carried forward, although this is questionable in the case of a standalone scheme, i.e for discretionary licensing. Surpluses and deficits cannot be carried forward in respect of elements which are not properly chargeable.
- g) Fees can only cover the actual cost of the application process (plus monitoring); i.e only the cost of processing the application and monitoring can be charged.
- h) Set up charges for the scheme cannot be recovered.
- i) Overhead and general administrative costs cannot be recovered. This means that the running and capital costs of the relevant council department cannot be charged as part of the fee.
- j) Fees can only be charged for the procedures themselves; i.e steps which are followed in processing the application for a license or for its renewal (plus monitoring of the license holder) which means the administrative costs involved for vetting applications and for monitoring compliance with license terms.
- k) The council is not allowed to make a profit.
- l) A formula can be used to set charges so long as it is based on the cost of the actual authorisation process (plus monitoring costs).

The council must act lawfully and in accordance with any guidance given to it by the Court as to how the fee is to be determined. If it is necessary for the council to re-determine a fee then the same principles apply in relation to the re-determination.

	<p>Furthermore it is clear that costs associated with enforcing the HHSRS which operates alongside licensing cannot be recovered via licensing fees.</p> <p>A number of local authorities charge extra fees if an application is submitted late. This has always been highly questionable as a disguised penalty but it would appear that this would now be largely outlawed by the ESD. Discounted fees are often allowed for early applications but it may now have to be shown that the normal application fee is more than the actual processing cost so that fees for an early application would have to be genuinely discounted.</p> <p>Any element of the fee that cannot be recovered must fall on the council tax payer; i.e the councils general fund; not the general body of licensed landlords.</p> <p>The ESD also deals with the time to be taken in processing applications. It requires local authorities to publically state the time to be taken to process the application. There is provision for extending the time limit in a case involving complexity. Subject to this if an authority failed to process the application within the stated time then the applicant can automatically assume that the application is granted. We do not have this information.</p> <p>Although requests have been made to seek the detailed costings and budget associated with this scheme, Peterborough City council has failed to accede to this request. In the absence of this it is impossible for anyone to test whether the fee includes any sums that are not properly chargeable via a licensing scheme. The only information provided by the council in response to some questions regarding fees and the budget is the total income and expenditure in the initial years of the scheme</p>		
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and this reveals a substantial loss in the beginning with a surplus towards the end of the scheme.

CONCLUSION

CASL is opposed to the proposed licensing scheme for the reasons outlined above. The use of Selective Licensing which focuses on the status of the landlords and properties in an area will not resolve many of the issues identified in the proposal and evidence document, as these are issues resulting from the activities of tenants who live in the locality and not connected with the way in which their accommodation is provided. As has been stated above, selective licensing is not a solution in itself as resources will need to be allocated by the Council as well in order to address the underlying issues which create the perceived need for intervention. If this does not happen then the underlying problems that have been identified will remain unresolved. This council has at its disposal a vast array of powers that can and should be utilised in order to address the problems identified. What is essential is that if problems exist which are sufficiently directly related to private rented housing to justify the introduction of selective licensing, that targeted enforcement is used as a comprehensive sanction against those who are found to be acting criminally and a willingness to enforce those powers backed up by adequate resources.

Any regulation of the private rented sector needs to be both balanced and effective. Additional regulatory burdens must focus on genuine detriment and aim to combat it by increasing the professionalism of landlords, the quality of the private rented housing stock and driving out criminal landlords who blight the sector. It should be the shared objective of all

	<p>concerned to facilitate the best possible outcomes for landlords and tenants with good practice being recognised and encouraged in addition to focus on enforcement activity. This approach does not require selective licensing and is not strengthened by its adoption as a potential solution.</p> <p>CASL believe that it is necessary to find a real and lasting solution to the problems that have been identified in the areas. There is a much bigger picture that needs to be appreciated and tackling the housing issues is only one part of that picture.</p> <p>CASL looks forward to formally hearing from the Council in relation to this response and receiving an undertaking that the proposed scheme will not be proceeded with as clearly the case for it has not been made out. In the event that the Council proceeds with submitting the proposal to the Secretary of State for consent then an undertaking is also required that this and any other responses received by the council in relation to this proposal are forwarded with the application to the Secretary of State.</p>		
15.01.16	<p>Dear Sir or Madam,</p> <p>I have attached a letter (in pdf) that I wish to be included as part of your consultation. Please can you make sure it gets included.</p> <p>Kind Regards</p> <p>Dear Sir or Madam,</p> <p>MY RESPONSE TO THE PROPOSED SELECTIVE LICENSING IN MY AREA AND FEEDBACK ON YOUR CONSULTATION</p> <p>First of all I was disappointed that your questionnaire did not have a selection for residents who are ALSO landlords in the</p>	<p>Dear Mr xxxx,</p> <p>I write further to my email of 29th January.</p> <p>I have now had the opportunity to review your consultation response in detail and note all of the comments therein.</p> <p>Can I begin by thanking you for the time you have taken to respond to the scheme. Your letter makes a number of comments and asks a number of questions. You make it clear that you are responding as a small independent landlord.</p>	<p>GG responded 02/02/16</p>

	<p>area, such as me. Because we also live in the proposed area we might have a different view to someone who is a landlord in the area but does not live in the area. The last consultation from 2103 also missed this out. I was also disappointed that your online questionnaire does not allow more than one user of a computer to complete the form. Surely not everyone living in the same household holds the same views, and more than one person might want to have a say.</p> <p>You probably will not receive a lot of response to this consultation and certainly not anywhere near as the last consultation (2013). This is because last time there was a majority of people against selective licensing and a huge uproar erupted especially in the Central area. The vast majority of questionnaires returned that time were clearly AGAINST selective licensing and they made this clear by only partially filling in the form because if they had filled in all of it, it would suggest they were in favour of some sort of landlord regulation. That questionnaire was clearly not a fair document and was engineered so people give specific responses in favour of selective licensing. There was also an online petition with a huge number of signatures against Selective Licensing. Most people who were against this proposal last time have given up because they are saying their views are NOT being listened to, because all the time and work they put in last time opposing this scheme has just ALL totally been ignored and they feel it will be again.</p> <p>To an extent, this current questionnaire is engineered too (so that people give specific responses in favour of some sort of regulation of landlords). It should have had a section where we could put other alternatives to licensing as in my opinion licensing will not work and is clearly the wrong approach. There is only a minority of rogue landlords. The vast majority like me are good landlords who are aware of the regulations and who look after our properties and tenants as well as the neighbours of these properties. I am only a small landlord and I</p>	<p>Your opening two paragraphs are critical of the consultation process adopted, in particular the questionnaire. You suggest that it was deliberately misleading and engineered to show support for the proposals. I reject this completely. The Council engaged a professional and independent communications agency to assist in designing a consultation questionnaire and consultation process that enabled debate and dialogue. In addition seven consultation events were put in place across the entirety of the areas potentially affected which allowed people the opportunity to come and discuss the proposals.</p> <p>You make comment in paragraph three about the proposals diverting council resources to check on good landlords leaving them less time to concentrate on the bad. This is not the case. The scheme will fund licensing officers to administer the scheme. It will allow our housing enforcement officers more time to proactively investigate and trace poor landlords.</p> <p>Before I move to the questions you pose I will point you in the direction of the two public reports prepared for the Strong and Supportive Scrutiny Committee. These are attached for your benefit. I believe some of your questions fall into the same broad categories as are addressed within those reports. Where that is the case I will point you to those reports rather than duplicate the information here.</p> <p>I will now address each of your questions:</p> <ol style="list-style-type: none"> 1. The ability to deal with difficult tenants is something that we are committed to working with landlords on. The proposals include a condition for a tenancy agreement to be in place which clearly sets out the responsibilities upon landlords and tenants in relation to a range of issues. Many landlords currently do not have these in place. In addition we will be providing 	
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	<p>feel the council want to punish me for the bad actions of others. They already have more than enough powers to prosecute bad landlords so there is no need for this scheme. It will just divert resources to the council checking up on good landlords like myself which leaves them less time concentrating on the bad landlords. I also feel that some bad landlords will probably not even come forward to register themselves and continue to operate under the radar. It is these landlords the council should give their full concentration to and clearly selective licensing will not work here. Page 2 of 5</p> <p>The rest of this letter refers and responds to specific points to your 'supporting documents' you put up on your website, and the points raised by me are in no particular order: SL = Selective Licensing</p> <p>1. You clearly have not pointed out how SL will give 'greater' ability to landlords to deal with rogue tenants – how is this possible? We don't need SL for this. The same also applies for 'waste management' issues. How actually would SL improve this?</p> <p>2. With regards to 'more settled communities' – surely most landlords like myself want long term tenants who look after their properties and do not cause ASB. But, tenants will move to where they are able to find work. Also, over the last 5 years I and a lot of other landlords have found that tenants are staying put for a lot longer, a lot of them for over 6-8 years. But, surely your idea for 'settled' communities is wrong. Most of the owners of property in the Central and North areas are Asian and have previously lived in the houses and in some cases at least still live in the area. However, with a little wealth people progress and have aspirations to live in more affluent areas which in most cities as in Peterborough are NOT the areas around the City Centre. What is so wrong with that? And most tenants in the proposed areas are Eastern European and</p>	<p>training for landlords AND tenants as to their responsibilities under the housing act and any conditions that these proposals would entail. We have never suggested that Selective Licensing will deal with all the issues on its own; we are continuing with our cumulative impact policy in the area to prevent further escalation of premises licensed to sell alcohol, we are looking to introduce public space protection orders coterminous with any final selective licensing areas and will be introducing a joint police, fire, local authority prevention and enforcement team in order to tackle anti-social behaviour.</p> <ol style="list-style-type: none"> 2. Settled communities does not mean no movement. It means a more settled demographic which is affected by economic and market forces rather than poor housing or other decline. 3. The introduction of Selective Licensing will allow us to take a more intelligence based approach to tackling poor landlords. Our current resources do not allow this. 4. Retaliatory evictions are still a problem. Raising housing standards and making sure that all landlords are aware of their duties we believe will help reduce these. 5. We are required to publish a register by law 6. I have covered this within my answer to question 1. 7. Right to rent is an entirely separate piece of legislation and complements rather than replaces or duplicates Selective Licensing. 8. The additional issues I have raised within my answer to question 1, addresses this issue. 9. All landlords with properties in the area will require a licence. The issue of whether we can vary fees at any point within the scheme is something that we considered but come to the conclusion we cannot. 	
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	<p>will move around where they find work. Most have no wish to ever own their own property as 'renting' is normal to them as it is to most people on Continental Europe. It is only here in the UK we put into peoples minds from childhood that one day they have to own their own house.</p> <p>3. Instead of SL you should have more of an intelligence based targeted approach to finding problem landlords and properties. You could for example ask for landlords or agents details from tenants when they register for Council Tax.</p> <p>4. Why are you still mentioning 'retaliatory evictions' being a problem as surely the new 'Deregulation Act 2015' which has been in force since October 2015 makes this illegal and will help Housing Enforcement Officers put a stop to this practice by a minority of landlords?</p> <p>5. You say you will put up on your website a public register of licenced landlords. Is this legal? Have you sought details from the Data Protection Act (and Information Commissioners Office) on your ability to actually do this?</p> <p>6. SL will not educate tenants about their responsibilities.</p> <p>7. The 'Right to Rent' is coming into force from February 2016. Surely this will help reduce the exploitation of illegal migrant workers by housing them in poor conditions. This is another reason NOT to have SL.</p> <p>8. On page 3 of 'The Selective Licensing Scheme' document you say SL will give the council power to manage tenants – How exactly will this be achieved? Page 3 of 5</p>	<p>Therefore if a property is purchased in year one or year five a license will still be required. We are hopeful that most landlords will become accredited and take advantage of the £50 total flat fee. We are unable what will happen at the end of five years. We will be constantly reviewing the impact of the scheme in order to make a considered decision at the time.</p> <p>10. The scheme will allow officers to tackle real issues not just chase unlicensed premises. However, we would question why anyone would remain unlicensed and that itself could indicate an evasion because the standards required by law are not met.</p> <p>11. The proposals are intended to raise standards not become an administrative burden. At the present time any action we take is administratively difficult and selective licensing will improve this.</p> <p>12. The evidence base used is the Office of National Statistics. LSOAs are approximate populations hence the difference</p> <p>13. All the areas of Peterborough have been compared with each other. This provides us with Peterborough's average and all areas fall above or below that average. We do not seek to use any one condition, such as low housing demand, on its own. We are proposing selective licensing only in those areas that meet at least five or all six of the conditions available to us.</p> <p>14. I note your comment about crime statistics. Not all people who leave the City Centre make their home on the same route or through the same area so all areas surrounding the City centre could be equally affected.</p> <p>15. We have not distorted the evidence. We have been clear about what has been compared to what. We believe the evidence base to be robust and appropriate.</p>	
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<p>9. Regarding fees, you have not made clear how much it would be to licence a property midway through the scheme, for example if a landlord buys a rental property in say March 2018. Is it still the full fee or will it be pro-rata? And what happens after the 5 years is up? Will the scheme be extended?</p> <p>10. If the scheme goes ahead, I think the enforcement officers will just waste time finding and fining unlicensed landlords rather than actually tackling the issue of bad housing conditions and tenant ASB.</p> <p>11. According to your support documents you clearly know the number of properties which are rented and so therefore know which ones they are. Surely you can just find the owner from Land Registry records if you are trying to trace an absentee landlord.</p> <p>12. On page 4 of the evidence document you state Peterborough has 188,373 residents. You also state that there are 112 LSOAs (each averaging 1,500 residents, making 168,000 residents in total). Why the large discrepancy of 20,373?</p> <p>13. Concerning LOW HOUSING DEMAND on page 5 of the evidence document you should be comparing 'similar areas with similar housing' but in fact you have compared the Central area with West Ward and Hampton Ward. The West ward is a much more affluent area with larger detached houses. In no way are these similar areas. Also, Hampton is a very new estate with relatively new builds. In the Central area many houses are over 100 years old so how and why are you comparing these areas. You have only compared sold prices. You have not compared rental figures. You should be including rental figures too. And, one area selected for SL in Bretton actually has a higher average selling price than the Bretton</p>	<p>16. The City centre forms part of the selective licensing scheme area and the growth of residences in that area demand that it should. I do not believe it disadvantages the areas you have mentioned. Each LSOA is compared upon its own merits.</p> <p>17. All the LSOAs are compared with each other.</p> <p>18. This is based upon BRE evidence and our own figures.</p> <p>19. Thank you for your comment. I believe the figures do indicate an issue.</p> <p>20. Thank you for your comments. We have compared LSOA against LSOA thus there is what we believe to be a fair comparison. It is not based upon ward boundary.</p> <p>21. We believe this conditions will improve safety and raise standards within our privately rented sector.</p> <p>22. This condition is included in order to protect landlords who often tell us, for example, that they let to two people and then unbeknown to them eight people are suddenly found to be living there. The issue then becomes one of overcrowding which is one of our major concerns. This condition will have to be dealt with on a case by case basis.</p> <p>23. I note your comments. I am disappointed that you feel there is a personal vendetta against some landlords. I do not believe this to be the case. In order to ensure that all properties in the area are being run to standards that are appropriate for the 21st century we need to ensure that a common standard is reached. We believe properly run business will mean properly managed houses.</p> <p>24. I note your comments however we believe the Equality Impact Assessment to be of an appropriate standard</p> <p>25. I note your comments in relation to a community meeting. We believe our consultation process to have been robust. The use of drop-in consultation sessions (of which there was one in the Central area, one in the</p>	
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<p>average. On page 6 of the evidence document you again compare the Central ward with the West and Hampton Wards when in no way these are similar areas.</p> <p>14. Concerning your crime figures you have not made it clear whether you have excluded or including crimes committed by people who are just traveling home from the city centre (overflow) through some of the proposed areas for SL, when in fact they do not live in these areas. If you have included these figures this then distorts the statistics and the points you make.</p> <p>15. Concerning ASB (pages 7 & 8 of the evidence document) on the graph you have compared 2001-2004 figures with 2011-2014 figures. You should have compared more 'recent' figures. This is because in the first set of data (2001-2004) there were no or very little Eastern European migrants (tenants) as they started arriving from 2004. In their early years here they probably were not aware of the laws, rules and regulations as much. Over the years they have become accustomed and so have become 'better' tenants and residents. By using these two sets of data you have again distorted the evidence, as you are aware that the vast majority of tenants are from Eastern Europe.</p> <p>16. Again, on page 8 (evidence document) you have NOT taken out city centre figures for ASB when considering Central and East areas. Therefore this data is distorted. Page 4 of 5</p> <p>17. Concerning poor property conditions (page 11 of the evidence document); you have only compared the 'whole' of Peterborough with the East of England. Why have you not compared the individual LSAOs?</p>	<p>adjoining Park area and one in the adjoining City Centre area) allowed for much better dialogue and discussion than a public meeting which can tend to have limited consultative impact.</p> <p>26. I note your comments however we believe the Equality Impact Assessment to be of an appropriate standard. The proposals do not concentrate solely upon the Central and Eastern wards.</p> <p>I will ensure your letter and my response is brought to the attention of the committee as outlined within my email of 29th January</p>	
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	<p>18. On page 12 (evidence document) you mention 1/5 properties have Category 1 hazards. How do you know this? Have you visited these properties or is this an estimate?</p> <p>19. The 'Deprivation' reason for SL I believe does not stack up in this case as your figures show this is not a major problem.</p> <p>20. With your burglary figures on page 19 & 20 (evidence document) you have not broken down the figures to say whether they were in commercial buildings, owner/occupied residential buildings or rented accommodation. It is my understanding that most burglaries in at least the Central area have occurred in 'owner/occupied residential' properties. In this case, your figures should not be used for the proposal for SL. On page 20 & 21 (evidence document) for 'robberies' and 'car crime' you have not distinguished between the 'city centre' and the rest of the Central area again, so your evidence is misleading and distorted in favour of SL.</p> <p>21. In the 'Proposed Licensing Conditions' you have said landlords must ALSO have carbon monoxide alarms if you have a GAS appliance. Why are you making this a condition when normally we would only require just a smoke alarm? Do you have evidence of any abnormal carbon monoxide incidents in the proposed SL areas? If so, why have you not published this data? The same theory also applies to the 'Electrical Testing' requirement you are also requiring – do you have any evidence of a higher than average electrical incidents in the proposed SL areas? If so, where is the evidence?</p> <p>22. Also in the 'Proposed Licensing Conditions' in section '11' how are you able to justify how long a visitor of any tenant is able to stay in their home?</p>		
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	<p>23. Concerning your 'Support for Landlords' document, I was disappointed that on the three consultation exhibitions that I attended my views on alternative help and support was not really taken on board. Instead I was being told how Selective Licensing was definitely going ahead, to which my thoughts were why are you wasting taxpayer money on expensive consultations then? On two separate occasions council officers mentioned there are landlords out there (in the proposed SL areas) who are not declaring their rental income for tax purposes. That might be the case, but surely that is a case for HMRC to deal with and not a reason to bring in Selective Licensing! It was as if the council officers had a personal vendetta against private landlords in certain areas.</p> <p>Page 5 of 5</p> <p>24. In relation to the Equality Impact Assessment I believe that the 'full' assessment is incomplete as there is clear evidence that the vast majority of landlords in the Central and East areas are of Asian descent. You have not gone out of your way to get this evidence as you have with your other facts and figures. The vast majority of tenants in these areas are from Eastern Europe. There are also quite a large number of 'Roma Gypsy' tenants within these areas. So, I think you really have not completed this assessment as you are required to do so.</p> <p>25. In the Equality Impact Assessment you say you will have 'community meetings' in the consultation. To my recollection I did not see this and I do not believe this happened. You only held 'drop-in' exhibitions. You were NOT prepared to hold a community meeting in the Central Ward (where the majority of landlords ARE Asian) even after being requested to do so by the local councillors. So you are giving misleading information here.</p>		
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	<p>26. On section '8' of the Equality Impact Assessment you have put a mark against 'C' when you clearly should have put a mark against 'E' because certain groups WILL be disadvantaged if Selective Licensing goes ahead. The vast majority of Landlords in the Central and East wards are Asian and the vast majority of tenants are Eastern European (White-other). You have NOT filled in section 9 which you should have. And I believe you require further legal advice in this respect.</p> <p>In conclusion I would just like to say that I and many others believe that selective licensing is a way of punishing good landlords for the actions of bad ones. Local authorities have more than enough powers to act on bad landlords so they should use existing methods more effectively. The government are also helping councils with giving them more and more new laws and powers (for example by introducing the Deregulation Act 2015). Landlords are already being hit with higher taxes (for example an extra 3% stamp duty from April 2016 and by abolishing the 10% Wear & Tear Allowance amongst others). This will leave good landlords like me with less and less money for improvement work to properties. On top of this we do not need extra costs to pay for selective licencing. I am doing everything that is expected of me by the law. I am fully aware of the latest rules and regulations concerning landlords and the letting of property. I do not require to be accredited to gain this knowledge, as I learn these things myself from resources from the internet and by attending landlords information seminars once a year.</p> <p>Please can you include this letter as part of this consultation and if you are able to I hope to receive a response.</p> <p>Yours faithfully</p>		
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15.01.16		<p>Thanks for your input into the Selective Licensing consultation process, which has been forwarded to me. It's appreciated.</p> <p>I understand your comments, which are reflective of some of the feedback we have received from some of the landlords; conversely, there are a number of landlords who are generally in favour of the scheme and we need to consider not only the direct feedback but also the social effects of introducing such a scheme and make a decision which on balance appears to be the correct one. I will address some specific points you've made, within this email.</p> <p>The issue of being able to introduce a scheme that is city-wide is something that has been raised at almost every consultation event. It is our view that legislation prevents us from introducing a scheme which would cover the whole city. Just last week the London Borough of Redbridge was unsuccessful in its attempts to introduce a borough-wide scheme; government guidance is clear: Selective Licensing should concentrate solely on those areas where there is sufficient evidence to warrant it. The evidence base used for Peterborough is clear that some areas would benefit, whilst others would not. Therefore to embark upon proposing a scheme that covers the whole city would be bound to fail.</p> <p>The first filter used to determine whether a scheme could be justified is whether an area comprises a high level of private rented stock (high levels can be deemed to be those above the national average which is currently 19%). The areas that people perceive to suffer issues similar to those within the proposed boundaries do not meet this criteria. This is largely because they are dominated by social housing which is managed by the City's registered social landlords. In addition,</p>	Original response 15/01/16
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	<p>Further comments sent on 18/02/16</p>	<p>whilst those areas may be perceived to contain the same issues, the evidence does not suggest they suffer the same issues (both visible and hidden) that those areas identified do. This is clear within the evidence document supporting the scheme. The proposed scheme covers a number of areas across the City and is not based upon political ward boundaries. Any suggestion that a particular group of landlords are being targeted (either directly or indirectly) is simply rejected by the council.</p> <p>The suggestion that the council has sufficient powers to enforce against bad landlords already is another regular comment. It is, however, in my view ill-conceived. Yes we have powers but the council is only able at present to offer a <u>reactive</u> service based upon the receipt of complaints about housing conditions. This means it is always on the 'back-foot' and has no real control over the condition of private rented stock across its city. It relies on landlords doing the right thing. Unfortunately the evidence suggests that a number of landlords simply do not do the right thing and thus our housing enforcement team are dealing with appalling conditions which are, in some cases, shameful for a City in the 21st century. We accept this is not all landlords, but those who do the right thing are encouraged to join one of the nationally approved schemes and take advantage of the highly <u>discounted fee of £50</u> for the full five year licence. The more accredited landlords we have the greater our ability to use our finite resources to target those who have not registered or seek to continue to act in a criminal manner.</p> <p>As I've said to you before, the idea that the area will degenerate because of selective licensing is not one that I accept. The raising of housing conditions is likely to mean that</p>	
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	<p>Dear xxxx, (responded 02/02/16 by XX)</p> <p>I am replying in respect of the additional comments you made relating to your original selective licensing consultation submission and the response you received from xxxx.</p> <p>You will be aware that xxxx forwarded your additional comments to xxxx and myself for comment. Please find below a response to those comments.</p> <p>Kind regards</p> <p>xxxx</p> <p>“Thank you for your email and for taking the time to respond to my comments. Whilst I note what you have stated in your email, I have to say that I remain to be convinced by the strength of your arguments and the case for introducing selective licensing in parts of Peterborough. I propose to elaborate on the reasons for saying this and in doing so to address some of the points you have made in your response.</p> <p>You talk about the reasons for not introducing a city wide scheme and the latest government guidance which tells you to concentrate solely on those areas where there is sufficient evidence to warrant licensing. You also say that the evidence base for Peterborough is clear that some areas would benefit and you touch upon the extended criteria that was introduced in April 2015.</p> <p>The reason why the changes were brought about in April was to remind local authorities that the purpose of licensing was to address specific issues in those areas that had sufficient problems associated with low housing demand and serious</p>	<p>the area will become more desirable with market forces resulting in increased value of the housing stock.</p> <p>Certainly the issue of some bad tenants is real. That is why we are looking to introduce public space protection orders that are coterminous with any proposed selective licensing area. This will allow our enforcement teams to tackle individual behaviour in a more effective way. We will also be introducing training for landlords on how to effectively deal with poor tenants; the bedrock of this is the proposed condition that tenancy agreements are a pre-requisite of a licence. You'll be aware that in many cases tenancy agreements simply do not currently exist.</p> <p>You make mention of Manchester as a scheme to learn from. Whilst Manchester may not be renewing its scheme that is an issue for them; it may not fit their City's current need. Government currently allows a scheme to run for 5 years only. It is not intended to be a long-term feature of current policy, it is designed to raise standards. Any scheme should show tangible improvements within that 5 period. I would expect that to happen here.</p> <p>We want to use our finite resources effectively. Reactively responding to complaints about appalling housing conditions is resource intensive and ever increasing. We need to proactively raise housing standards. We hope that most landlords will demonstrate their intent to do the right thing by becoming accredited, thus allowing those finite resources to concentrate on those criminal landlords who are abusing vulnerable people in our communities.</p>	
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	<p>anti-social behaviour and not introduce blanket schemes which was becoming the tendency of late. There is nothing to stop this council from introducing a more targeted scheme which is limited to those areas where there are real problems. Even though the proposed scheme is not city wide it is still far too wide and includes many areas where low demand and anti-social behaviour are not issues. The legislation and guidance in relation to selective licensing clearly states that its introduction has to be evidence based, The evidence base as you call it has to be more than simply paying lip service to what is required under the legislation. The evidence must be empirical and stand up to scrutiny. However, there is no real evidence in the councils proposal which shows how selective licensing will improve low housing demand and how it will improve economic and social conditions for all people in the areas. Neither is there any evidence of a connection between the factors identified and private rented housing.</p> <p>We note your comments in relation to this section. We believe our evidence base to be robust. We believe that the layered approach, in particular that we are only considering those areas which meet five or indeed all six of the conditions upon which councils can rely, indicates an overwhelming correlation between the high levels of private rented sector and the issues comprising those conditions. In fact, the evidence shows that the areas of highest private rented stock in the City are the areas with the multiplicity of issues that the schemes aim to address. There is only one LSOA that bucks this trend, that is the village of Wittering. That area contains the highest proportion of private rented stock but has none of the factors experienced by all those others; it is thus not included.</p> <p>In the current economic climate the last thing good landlords need is licensing particularly where there is little direct</p>		
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	<p>evidence of any immediate benefit to landlords and tenants. The housing market suffered collapse in 2007. Many who bought houses prior to the collapse could be subject to negative equity, thus preventing them from selling. Renting is the only option open to them if they have to move due to their job. Low interest rates have supported people during the banking crisis that hit the UK housing market. An increase in running costs courtesy of the councils licensing fees is not only inappropriate but could be a hammer blow to the local housing market.</p> <p>We have considered the issue of financial impact upon landlords carefully. We have suggested a fee structure that is deliberately advantageous to landlords who demonstrate that they adhere to national standards by becoming accredited members of any one of a number of national bodies. We do not believe this fee structure places an undue burden upon those landlords who want to do the right thing.</p> <p>You do not accept that there will be a denigration of the area. However, the consultation and evidence document does not appear to consider this possibility and there is no contribution/evidence from financial institutions. The councils scheme fails to provide a road map on how selective licensing will interact with house prices. Such a lack of synergy is disconcerting and will further affect investor confidence, potentially destabilising demand to an even greater extent thus negating any potential positive impact of this scheme.</p> <p>It is our belief that raising standards within the area will increase the value of housing stock by making it an area of desire. The issues faced by some tenants under current</p>		
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	<p>arrangements are costly to the public purse and raising of housing standards will reduce this burden.</p> <p>You reject the suggestion that a particular group of landlords are being targeted either directly or indirectly by this scheme. The point that I was making was that because the large proportion of residents in some of the areas being selected were of a particular ethnicity no real account has been taken on the affect that this will have on that group. An equality impact assessment has been carried out which recognises the potential affect this scheme could have on Asians but because there was no evidence that Asian landlords formed the majority in some of the areas this was then discounted. I am surprised at this because ethnicity data will be available from the last Census which would tell the council what group the majority of owners belonged to and following from that which group the majority of landlords were.</p> <p>We believe the equality impact assessment carried out to be robust.</p> <p>You say that the suggestion that the Council has sufficient powers is ill conceived and the council is only able to use its existing powers reactively and there is no control over the condition of private rented housing. I am afraid that the point you make displays a clear lack of knowledge of the powers that are available to the council. Guidance issued by the DCLG tells local authorities of the sorts of factors to look out for as evidence of poor conditions. The council does not need to wait until someone makes a complaint. The council has existing powers to inspect properties irrespective of complaints and to seek and obtain information about the occupiers and the landlord. If the council is waiting for complaints to be</p>		
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	<p>generated then I am sorry to say that the council is failing in its duty under part 1 of the Housing Act 2004.</p> <p>At the present time the Council's limited resources are constantly tackling calls for service. The introduction of selective licensing would raise standards, reducing the calls for service caused by landlords who perhaps do not currently understand their responsibilities. It would allow our officers to be truly intelligence led in order to trace and tackle those landlords and agents who are deliberately flouting the law.</p> <p>Poor housing conditions are only ultimately going to be resolved through enforcement activity which is permitted by existing regulations. Selective licensing will not resolve many of the issues that have been identified in the evidence document. Cases where the law has been broken requires the use of appropriate enforcement by the authorities charged with responsibility. Licensing of properties and landlords is a poor substitute for enforcement of the law. In any event many of the issues are tenant related and nothing to do with the property or the landlords. The challenge for the council is to work with everyone involved and not just blame one group - landlords. A problem encompassing some poorly managed and or maintained properties would not be appropriately tackled by a selective licensing scheme. In many of the cases that have been identified in the evidence document the council can and should consider using enforcement notices and management orders. A targeted approach on a street by street basis, targeting specific issues joined up with other agencies will have much greater impact.</p> <p>We have considered the resources available to tackle this issue in a different way. On balance we feel that selective licensing</p>		
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	<p>will allow our officers and services to tackle those issues in a more effective way.</p> <p>Another issue is the question of resources and whether the council will be able to adequately enforce the scheme. Have you taken into account how many people will need to be employed and what you can use the fees that will be generated from licensing. How long will the processing of applications take. How long will the inspections programme take place. There is insufficient information in the documents to enable a proper assessment to be made regarding this and ultimately as to the success of this scheme. if all the time is spent in processing the applications from the good landlords then you will not have dealt with the bad landlords as they would not have come forward. How will this scheme make prosecutions easier.</p> <p>We have considered this aspect carefully and have used the Department for Communities and Local Governments approved cost calculator to plan for an increase in staffing to undertake the licensing process. This aspect, and this aspect alone, is what the scheme will fund. This will allow our housing enforcement officers to undertake a far greater prioritised programme of work, tackling those landlords that need it.</p> <p>I hope the above is further food for thought and I look forward to hearing from you in due course.</p> <p>I have one small request which I hope you can meet, I understand that this scheme is being re-considered and if it goes to the secretary of state's consideration then I would kindly ask you to forward our email trail to their attention so they could go through all angles and come up with the best decision.</p>		
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	I can confirm that your comments will brought to the attention of the Strong and Supportive Scrutiny Committee members as was their request at the meeting held on 20 th January.”		
15.01.16	<p>Hi,</p> <p>Please find attached the response by the NLA in relation to the proposed introduction of Selective Licensing</p> <p>Introduction:</p> <ol style="list-style-type: none"> 1. The National Landlords Association (NLA) exists to protect and promote the interests of private residential landlords. 2. The NLA represents more than 62,000 individual landlords from around the United Kingdom we provide a comprehensive range of benefits and services to our members and strive to raise standards within the private rented sector. 3. The NLA seeks a fair legislative and regulatory environment for the private rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities. 4. The National Landlords Association (NLA) would like to thank Peterborough Council for providing the opportunity to comment on the Selective Licensing consultation. <p>Executive Summary:</p> <ol style="list-style-type: none"> 5. Having considered the evidence presented and undertaken its own evaluation of the circumstances faced by the residents of Peterborough the NLA’s position can be summarised by the following brief points: <ul style="list-style-type: none"> ☑ Landlords have very limited authority to deal with matters of ASB. 	<p>Dear xxxx,</p> <p>Can I thank you for your organisations response to Peterborough’s proposals for considering the introduction of Selective Licensing within its private rented sector. I apologise for my delay in responding to you.</p> <p>Your response is being considered as part of the Council’s overall scrutiny and consideration of the proposals. The next stage of the democratic process is that the proposals, together with the consultation responses and consultation evaluation, will be placed before Peterborough City Council’s Cabinet on 29th February. Public documents outlining the proposals will be published one week before that meeting and will be available via the website www.peterborough.gov.uk/council/council-meetings.</p> <p>Can I thank you for your detailed submission which is helpfully set out with the executive summary covering your main observations. I respond to those observations below taking due note of the detail supporting your main points as set out within the main body of your document:</p> <p>Landlords have very limited ability to deal with ASB:</p>	Response sent 16/02/16

	<p>☒ Discretionary licensing is not an appropriate reaction to the cited issues as it provides no further facility or powers to deal with criminal activity i.e. car crime.</p> <p>☒ The scheme will add to further displacement of problem tenants in the Peterborough area.</p> <p>☒ The consultation paper fails to provide sufficient evidence to support claims made about ASB and how it is related to the private rented sector.</p> <p>☒ The documentation provided also fails to indicate that sufficient funding will be available to support the functions necessary to support licensing.</p> <p>☒ You cite (p.15) you have limited sources of accurate data. Before progressing, the Council should get accurate data, as in many of the cases i.e. crime it is casual link not evidenced. The qualification of the data should take place.</p> <p>Recommendations:</p> <p>6. Three areas should be removed from the consultation - e01015614 east, e01015668 Stanground central and e01015677 Walton.</p> <p>7. The Council is proposing to license more than 20% of the private rented sector and will be required to apply to the secretary of state for permission. The Council should present the alternatives it considers suitable, should approval not be granted for the whole of the proposed area.</p> <p>8. The paperwork involved in applying for a license could and should be reduced; the rationalisation of processing of licensing forms for applications especially multiple applications should be abridged</p> <p>3</p>	<p>We acknowledge this issue and do not seek to apportion blame for individual acts of anti-social behaviour upon all landlords. It remains our experience that a number of landlords within Peterborough fail to even have the basic of tenancy agreements in place which set out clearly the responsibility of tenants to act appropriately. We have considered the feedback received at local NLA meetings and amended our proposals for a condition of the licence (as it relates to obtaining references) that a prospective tenants previous behaviour in relation to ASB be sought, we accept that references should only seek prior knowledge of any ASB connected with them at their previous tenancy. We do not suggest that Selective Licensing on its own will deal with all of the issues affecting an area, thus in addition to our SL proposals we will be looking to introduce Public Space Protection Orders (as set out within the Anti-Social Behaviour, Crime and Policing Act 2014) coterminous with any finally agreed areas designated for SL. We are creating a multi-agency joint prevention and enforcement team that will make dealing with anti-social behaviour more effective by ensuring officers have all the appropriate powers available by use of the Community Safety Accreditation Scheme. We are embarking upon training for landlords and tenants about their roles and responsibilities and this will include the process for dealing with ASB. A programme of improvements to the public realm is also underway and we are seeking to invest significantly in the area to improve community capacity and cohesion.</p> <p>Discretionary licensing is not an appropriate reaction to the cited issues as it provides no further facility or powers to deal with criminal activity:</p>	
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	<p>where appropriate. The process can be simplified along with costs that are incurred by Peterborough Council and to the landlord. We would be willing to work with the Council on how this can be done, in order to construct a more appropriate proposal for a targeted engagement strategy.</p> <p>9. The NLA contends that the flaws outlined below in the process and proposals must be rectified prior too progressing this application. Furthermore, once the necessary data has been identified and provided this consultation exercise should be repeated ensuring engagement with all relevant stakeholders.</p> <p>General Feedback on Proposals:</p> <p>10. The ability to introduce Licensing is a powerful tool. If used correctly by Peterborough Council it could resolve specific issues. The NLA has supported many local authorities when the introduction of a licensing scheme has been introduced, as it will benefit landlords, tenants and the community.</p> <p>11. The scheme to be successful will require significant resources from the Council, both in direct costs and in service provision from the Council. a targeted approach on a smaller area will be more successful when Council resources are stretched.</p> <p>12. The legislation in relation to Selective Licensing clearly states that the introduction of licensing has to be evidence based. This evidence must support an argument, based on the evidence that the Council has presented the NLA would argue that there is no case for the introduction of licensing as proposed in the following three areas (e01015614 east, e01015668 Stanground central and e01015677 Walton) and do not fall into the bottom quintile of poor conditions as identified by the Council. The NLA contends that the criminal</p>	<p>We are not seeking to rely upon SL alone to address deep rooted community issues such as crime. I have outlined above some of the additional initiatives we are introducing to deal with the complexity of issues that the areas we have identified suffer.</p> <p>The scheme will add to further displacement:</p> <p>We will be monitoring all other areas of the City to ensure that unscrupulous landlords do not simply migrate to adjoining areas. This one important factor of the scheme that will be reported upon regularly to relevant Scrutiny Committee as part of the schemes ongoing evaluation.</p> <p>The consultation paper fails to provide sufficient evidence to support claims made about ASB and how it is related to the private rented sector:</p> <p>The proposals for the Peterborough scheme seeks to only include those areas that we deem to be truly in need of additional support and activity. Thus we are only proposing to introduce SL in those areas that meet at least five or all six of the conditions upon which we can rely as evidence. The layering of complex information has identified those areas and all suffer from ASB higher than the Peterborough average. In addition it is an irrefutable fact that the higher the proportion of private rented sector the higher the multiplicity of problems that exist within those areas. The only area that bucks this trend is an LSOA based entirely on a local RAF base where private rented stock is high but issues low. Use of the Office for</p>	
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	<p>activity identified is not linked in the evidence to the private rented sector.</p> <p>13. The NLA believes that any regulation of the private rented sector needs to be balanced. Additional regulatory burdens must focus on increasing the professionalism of landlords, the quality of private rented stock and driving out the criminal landlords – who blight the sector. It should be the shared objectives of all parties involved to facilitate the best possible outcomes for landlords and tenants and as such good practice should be recognised and encouraged in addition to the required focus on enforcement activity. This is not the case this time in all the areas that you have proposed.</p> <p>14. The housing market suffered a collapse in 2007. This has meant that many who bought houses prior to the collapse could be subject to negative equity, thus preventing landlords selling them. Consequently renting the property out is the only option, if they have to move due to their job¹. Low interest rates have supported many people, during the banking crisis that hit UK housing market.</p> <p>¹ http://www.independent.co.uk/money/mortgages/millions-face-becoming-mortgage-prisoners-as-rise-in-interest-rates-could-trap-to-23m-homeowners-9399137.html</p> <p>15. We have concerns around how this proposal will be considered by the banking industry; already banks are not lending in areas where licensing has been introduced. The Council should consult with lenders as this will have implications for existing landlords and future landlords. The proposed</p> <p>4</p>	<p>National Statistics lower super output areas (LSOAs) as the evidence base provides us with pockets of around 600 homes upon which our selection has been established. We consider the evidence shows an overwhelming need for us to tackle the issues; selective licensing will play a vital role, but not a lone role, in our efforts.</p> <p>The documentation provided also fails to indicate that sufficient funding will be available to support the functions:</p> <p>We have used the DCLG cost calculator to model our business need required to support the programme. We are confident in that approach.</p> <p>The final issue of ‘data’ I have addressed within may answer about the evidence base above.</p> <p>Moving to your recommendations:</p> <p>You suggest we remove four areas from our proposals. We are not minded to do this. To remove areas when they clearly show a need would be unwise. Any removal of areas on a subjective basis would go entirely against our principle of the evidence leading our scheme. I am aware from local NLA meetings that there were some areas that were not thought to be in obvious need. My view is that information and issues are so complex that they are not always visible. For these reasons our proposals for the areas will not alter.</p>	
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	<p>scheme could have a detrimental impact on Peterborough's housing market. The impact of similar licensing schemes has been a withdrawal of lending, it would also prevent from people moving property on.</p> <p>16. Peterborough Council has many existing powers. Section 57 (4) of the Housing Act 2004 states that a local authority "must not make a particular designation ... unless (a) they have considered whether there are any other courses of action available to them ... that might provide an effective method of dealing with the problem or problems in question". The use of these powers by the Council shows that the Council can rectify the problems as listed below give a Peterborough Council the ability to tackle many of the issues that they wish to overcome in all the parts of the city:</p> <ul style="list-style-type: none"> a) Use of Criminal Behaviour Orders; b) Crime Prevention Injunctions; c) Interim Management Orders; d) Empty Dwelling Management Orders; e) Issuing improvement notices to homes that don't meet the decent homes standard f) Directions regarding the disposal of waste (for example under section 46 of the Environmental Protection Act 1990); g) Litter abatement notices under section 92 of the Environmental Protection Act 1990; h) Powers under the Noise Act 1996 to serve fixed penalty notices or confiscate equipment (sections 8 and 10); i) The power to require rubbish to be removed from land under section 2 – 4 of the Prevention of Damage by Pests Act 1949. <p>17. One of the many reasons Peterborough Council has cited for the introduction of Selective Licensing is the impact of litter and fly tipping. Landlords will outline to tenants at the start of</p>	<p>You suggest we show alternatives should the proposals not be granted. I have outlined above some of the additional measures we will be introducing in addition to our proposals for SL. We believe a package of measures is required to address the issues we face.</p> <p>You suggest the paperwork involved in applying for a license could be reduced. We are developing a digital by default system to administer licensing. This will reduce enormously the amount of paper required and will have built in process for streamlining multiple applications.</p> <p>We note your additional comments in particular about the evidence base. We remain confident that our proposals are entirely within the spirit of the legislation and the evidence is robust.</p> <p>We have to seek to strike a balance for the benefit of the whole community. It is entirely understandable that landlords do not support the proposals as there will be an inevitable financial burden upon them. In the case of NLA members this will amount to £50 per property for a license lasting five years. The other initiatives we are seeking to introduce are aimed at genuinely improving the areas thus it is reasonable to conclude that landlords investments will increase in value. On balance we do not consider our proposals or fee structure to be unreasonable</p>	
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	<p>the tenancy their obligations in relation to waste and what they have to do to comply with in relation to waste disposal. This in many cases is the waste services provided by Peterborough Council, if the tenant does not comply with the waste collection then the tenant is responsible and the Council can take action against them directly – licensing is not the appropriate response to address this issue.</p> <p>18. The aims of the Council has i.e. removing nuisance, ASB, waste, improve housing conditions etc. can be achieved through existing legislation that Licensing will not and cannot achieve. The risk of introducing Licensing is likely to increase the costs for those renting, along with not resolving the problems that the Council wishes to resolve. A more erudite approach to dealing with nuisance and a separate policy to tackle the criminal landlords would be more applicable in resolving the issues.</p> <p>19. Often when tenants near the end of the contract/tenancy and they are moving out they will dispose of excess waste in a variety of methods, this does include putting it out on the street for the Council to collect. A waste strategy for the collection of excess waste at the end of tenancies should be considered by local authority with a large number of PRS properties in areas. This is made worse when Councils will not allow landlords to access the municipal waste collection points. The Council does not have a strategy in place to tackle the problem of waste from housing that is rented out and</p> <p>5</p> <p>appropriate waste collection bins provided for the accommodation. The NLA would be willing to work with the Council in developing this strategy.</p>		
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	<p>Negative Impacts of Discretionary Licensing:</p> <p>20. One of the dangers of the proposed Selective Licensing scheme fee is that those that do not take up accreditation could pass through the increase to tenants, thus increasing cost for those who rent in Peterborough; this cost would be passed back through to the Council in some of the cases. Thus increasing costs to Peterborough residents, especially the most vulnerable and least able to tolerate a marginal increase in their cost of living.</p> <p>21. The Council has failed to explain that as well as the Council's costs for the license the landlords costs will also be included in the rent rise. The failure to explain this shows a lack of understanding of how the private rented sector works.</p> <p>22. Areas that have been subject to the introduction of Selective Licensing have seen lenders withdraw mortgage products, e.g. Nat West Newham reducing the options to landlords reliant on finance. The Consultation documentation does not appear to reference this possibility or invite contributions from financial institutions. Financial stakeholders would appear unwise and potentially damaging to the application process and scheme implementation.</p> <p>23. Peterborough Council, by proposing the introduction of licensing is implying that there are social problems in certain areas; this could deter investment into these parts of Peterborough. This is especially true in areas where there is not a problem as evidenced in the Council's consultation. Why would people move to an area which the Council has designated a problem? There is no acknowledgement of the impact that discretionary licensing is likely to have on the areas that it is applied. The NLA would assert that failure to provide such information is an indication of a substandard and ultimately superficial consultation exercise.</p>		
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	<p>Resources</p> <p>24. Often cited as an example to other authorities, Newham Council has spent an additional £4 million outside what the license fee brings in on additional staff, which has resulted in a prosecution rate of >1% of landlords. However, while the London Borough has registered 30,000 landlords, it has so far only banned 18, and prosecuted 243. A targeted approach such as those adopted by Leeds and Manchester would be better value for the taxpayer.</p> <p>25. By removing the areas that the NLA proposes, it would allow the Council to concentrate its resources in those areas where greater need is required.</p> <p>26. The Council wishes to stimulate demand and subsequently increase property prices of Peterborough and the surrounding areas. The stigmatisation of a licensed area could stop lending in the area, as has been seen in other areas of the country where similar schemes have been implemented.</p> <p>6</p> <p>Current Law</p> <p>27. There are currently over 100 pieces of legislation that a landlord has to comply with. The laws that the private rented sector has to comply with can be misunderstood. A landlord is expected to give the tenant a “quiet enjoyment”, failure to do so could result in harassment case brought against the landlord. Thus the law that landlords have to operate within is not fully compatible with the aims that the Council wish. A landlord keeping a record of a tenant can be interpreted as harassment.</p> <p>28. The introduction of licensing is to tackle specific issues, many of these are tenant related and not to do with the</p>		
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	<p>property/landlord. Thus the challenge is for local authorities to work with all the people involved not to just blame one group – landlords. The NLA is willing to work in partnership with the Council and can help with tenant information packs, assured short hold tenancies, and accreditation of landlords, along with targeting the worst properties in an area.</p> <p>29. The NLA would also argue that a problem encompassing a few poorly managed and/or maintained properties cannot be appropriately tackled by a licensing scheme, which is not proportional. In many situations the Council should consider Enforcement Notices and Management Orders. This approach would be the most appropriate in e01015614 east, e01015668 Stanground central and e01015677 Walton areas. The use of such orders will deliver results immediately and a targeted approach against the worst offenders.</p> <p>30. A targeted approach on a street-by-street approach, in the areas where the Council has indicated where there are significant problems. Targeting the specific issues and joined up work between agencies, the Council, community groups, tenants and landlords will have a greater impact. It will also require outside bodies from the Council to commit resources to resolve these problems.</p> <p>31. The NLA agrees that some landlords, most often due to ignorance rather than criminal intent, do not use their powers to manage their properties effectively. We support the Councils move to support landlords that become accredited. An approach to identify issues and assist landlords, is supported by the NLA. This can allow Peterborough Council to target the criminal Landlords.</p> <p>32. The NLA would also like to see Peterborough Council to develop a strategy that can also include action against any</p>		
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	<p>tenants that are persistent offenders. These measures represent a targeted approach to specific issues, rather than a blanket-licensing scheme that would adversely affect the professional landlords and tenant whilst still leaving the criminal able to operate under the radar. Many of the problems are caused by mental health, drink and drug issues, these are issues that landlords cannot resolve and will require additional resources from the Council.</p> <p>33. The Council should consider alternative schemes such as the Home Safe scheme in Doncaster and SEAL in Southend. Both schemes offer alternatives, which the Council has not reviewed.</p> <p>Consultation Critique: 7</p> <p>34. Central government approval is a pre-requisite for implementation of a discretionary licensing scheme such as being proposed. Comprehensive consultation of affected stakeholders is a necessity.</p> <p>35. The issue of a person's origin should not be the basis for the introduction of selective licensing. All people should have housing that meets the legal standards regardless of where they are from. If a person is renting a property, they can move to any area. Geographical location can change; new communities will wish to live in areas with which they have a connection and access to appropriate support and facilities. The Council cannot engineer communities according to a predefined design, while people have free will to choose where they live. The inference that the Council is using selective licensing as a way to create communities according to a plan by the Council is not in the spirit of the legislation.</p>		
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	<p>36. In relation to ASB reduction, and the authority a landlord has to tackle such activity within their properties, it should be pointed out that landlords and agents can only enforce a contract. They cannot manage behaviour (ref: House of Commons briefing note SN/SP 264 paragraph 1.1). In most circumstances, the only remedy available to landlords confronted with cases of serious ASB in one of their properties will be to seek vacant possession and in many instances will serve a section 21 notice rather than a section 8 notice identifying the grounds for possession. The former is simpler and cheaper and repossession (at present) more certain. No reason needs be given for serving a section 21 notice and the perpetrator tenant can then hypothetically approach the local authority for assistance to be re-housed (ref: Homelessness Guidelines cl 8.2). Crucially, no affected party need offer evidence against an antisocial householder, reducing the risk of intimidation, harassment and ultimately unsuccessful possession claims. The issue of ASB will thus not appear as a factor in the repossession. In providing evidence to support a licensing application the document should clarify for respondents the position of all relevant under landlord and tenant law.</p> <p>37. The Council has relied on inferring a correlation between an index on multiple deprivation. The evidence that is presented in the consultation does not support this in all the areas. The three areas that we have identified (e01015614 east, e01015668 Stanground central and e01015677 Walton) are not areas of deprivation according to the Council. The private rented sector will have households that qualify as in deprivation, as individuals will move around so areas will increase the deprivation. The introduction of licensing will see groups moved around Peterborough more, which will move deprivation around Peterborough. A targeted approach</p>		
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	<p>towards deprivation should be the approach Peterborough Council adopts, regardless of where the person lives.</p> <p>38. The introduction of a selective licensing will run the risk of costs increasing for tenants, as landlords pass through the costs of licensing, not only the fee but also the administration fee of the landlord to process that application as well. This will add to costs of individuals living in these areas, reducing the disposable income for many of the residents.</p> <p>39. We are shocked that the Council has not taken action against those households that have poor housing conditions and have category 1 hazards. If the Council is aware of poor housing conditions, why has action not been taken against them? In the consultation document, evidence is given of those landlords that the Council has prosecuted, thus why has the Council allowed people they know to live in property that contains risks to life to continue to rent out property.</p> <p>8</p> <p>40. It is also worrying how little reference to the economic impact of increasing the cost of housing provision will have on the local community. We wish to understand how the Council believes increasing said costs would increase demand. The logic of this assertion is not clearly explained and will arguably lead to incorrect conclusions on the part of those stakeholders relying on the Council to inform their input into this consultation.</p> <p>Requests for Supplementary Information:</p> <p>41. The NLA is extremely concerned about the gaps in evidence and justification which occur throughout the licensing proposal. The following requests for further information</p>		
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	<p>should be addressed prior to making any attempt to progress an application for discretionary licensing.</p> <p>42. The NLA would like to understand the Council's reasoning for licensing, as a means of will improving housing. Given that successive governments have attempted to address the issue of anti-social behaviour, using significant resources to underpin structural causes, it seems unreasonable to contend that licensing of private property will succeed. Could the Council provide evidence to support this assumption, when they do not appear to have not committed the extra resources required?</p> <p>43. Leeds City Council, through the process of introducing Selective Licensing, incurred a cost of around £100k - met largely by the tax payers of Leeds². Newham has allocated money from the general fund for enforcement and received money from central government, how much money has the Council envisaged will be required for these new services?</p> <p>² http://www.publications.parliament.uk/pa/cm201314/cmselect/cmcomloc/50/5006.htm#a13</p> <p>44. The proposed conditions will require landlords to rely upon Section 21 and the possession as a response to ASB and other breaches of tenancy. It would be useful if the Council could put in place a guidance document before the introduction of the scheme which would outline the Council's position in helping landlords remove tenants who are causing anti-social behaviour.</p> <p>45. With the requirement for formal referencing included as a licensing condition, new delays are likely for prospective tenants, along with the inevitable difficulty some people will have securing a tenancy. Could the Council provide the equalities and diversity assessment that the Council has</p>		
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	<p>undertaken examining referencing as part of the proposed scheme? Equally, we are keen to understand what communication the Council has had with RSL's concerning the provision of referencing, including social housing providers that neighbour Peterborough?</p> <p>46. What provision is there for people who are first time renters, who will not be able to obtain a reference, to access decent housing? Will the Council undertake to fill the supply gap created by private landlords complying with licensing requirements?</p> <p>47. How will the Council prevent malicious ASB claims being made which can result in tenants losing their tenancies?</p>		
15.01.16	<p>I am writing with my comments/views on the proposed Selective Licensing scheme which has been out for Consultation. I attended your exhibition at the Fleet in November and have also attended two NLA meetings where Council representatives were present to discuss the proposed scheme. I have also emailed some questions to you during the last couple of months, but so far these have not all been answered.</p> <p>While understanding and agreeing with the goals of this scheme, I do not fully agree with the proposals being put forward. Below I have detailed my main areas of concern.</p> <p>I am concerned about the method used to select the areas of Peterborough to be included. This has been fully explained to me by your representatives and I understand that the</p>	<p>Dear xxxx</p> <p>Many thanks for your second email, following our response to you on 18th December</p> <p>With regard to the selection of the areas, we can only operate within the guidelines set out by DCLG – this is what makes the licensing “selective”. Areas that might be considered appropriate for SL can therefore be excluded. However, we have taken the decision to use a strong evidence base and we will adhere to that since unilateral alteration will simply raise similar personal views as to appropriate areas elsewhere. We are content that the evidence base we have used is robust and within DCLG guidelines.</p>	<p>Yes GG sent 08/02/16</p>

	<p>methodology as regards the percentage of private rented sector housing is outwith your control. But I feel compelled to comment on this because using this method clearly excludes some of the more problematic areas of the city, eg, Welland and Orton Goldhay. I understand that these were not considered because they have a high percentage of Social housing and therefore do not meet the requirements for inclusion, but I think this serves to demonstrate how inappropriate the scheme is for the particular demographics of Peterborough. My concern is that irresponsible Landlords will move to these areas of the city and thus instead of fixing a problem, the scheme will simply move it elsewhere. I do not see how that will “improve the quality of life for all in the area”.</p> <p>I also attended a number of meetings the last time the council proposed selective licensing for a different area within Peterborough. I am disappointed that having failed that time around you have taken the approach of targeting a larger area of the city while it is clear to all concerned that you are trying to resolve a problem in a particular area. The fact that the scheme now encompasses 37% of private rented sector housing surely suggests that it cannot be considered “selective”.</p> <p>At the NLA meetings I attended the council representatives were keen to point out that the cost is now “only £50 per property”. I myself am already an NLA accredited Landlord (having completed a paid for course), so I do not need to include the cost of going on a training course with them. But I pay £99 to the NLA every year to remain a member and to keep my knowledge up to date, thus demonstrating my commitment to being a respectable Landlord. I also pay to attend ad-hoc courses, eg, a Deposit Protection Workshop last</p>	<p>Having created such a robust evidence base we are confident that the proposals are ‘selective’. We have had many express the view that the whole city should be included.</p> <p>Your comments on the fee structure are noted; however we reiterate that we do not consider the £50 fee, over 5 years, to be material in the context of a residential letting.</p> <p>We will also take notice of your other comments regarding the wording being proposed</p>	
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	<p>year. Under the new scheme I will also have to pay out an additional £50 per property, a not inconsiderable sum. If you add this to all the other scheme requirements and changes over recent years it is becoming increasingly difficult to run a lettings business in the City. For example, you now require an electrical installation certificate so that will be another £100-£200 per property along with the cost of providing translated tenancy agreements. Add that to the Council Tax that now has to be paid during void periods, the cost of Right to Remain Checks effective next month etc. I have no doubt Letting Agents in the City will increase their fees to cover the additional administration they will have to undertake. So “it’s just £50 per property” is insulting.</p> <p>As a side note, a few years ago I was also accredited by Peterborough City Council as a Landlord under a previous scheme, something that took up a great deal of my time which brought me no benefits whatsoever and the scheme was later disbanded. It seems PCC cannot make their mind up about how to oversee the private rented sector in Peterborough and continually move the goalposts which makes it increasingly difficult to run a successful business.</p> <p>I strongly believe this is a “Tax on Respectable Landlords”, the Council will be using the monies we pay to finance tracking down and prosecuting the “Rogue Landlords”. Would a more appropriate funding structure not be to charge £0 for accredited Landlords and increase the fees charged to those not accredited? Would this not achieve the same aim, ie, to improve the standard of the private rented housing sector in Peterborough? It would appear doubtful that the rogue landlords in Peterborough will pay out for training and membership etc, so why not increase the fines they have to pay to fund this scheme? At a meeting with the Council for the</p>		
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	<p>previous scheme I clearly remember being told that the point of the scheme was to give the Council more powers to prosecute, so it seems somewhat unfair to charge the respectable landlords in the City for this.</p> <p>My fear is that this scheme will only serve to create new problem areas. For example, by excluding the areas of high social housing from the scheme, by definition of the statistics used to make the scheme selection, the poor landlords will move their activities there, or indeed the problem tenants who cannot be housed in the scheme areas. The selective licensing scheme will not fix the problems in Peterborough; simply move the problems to a different part of the city. I believe that the new Right to Remain requirements placed on Landlords will assist in this demographic shift, add into that your proposals as regards providing documents in a foreign language and it's not hard to predict that Landlords will be very selective about which nationality of tenants they let their properties to. This surely will not lead to the more diverse communities that you aspire to?</p> <p>Having read through the license conditions, it strikes me that these have been put together rather hastily. Indeed at the NLA meeting, numerous issues with the wording of these conditions were highlighted. Your representatives were keen to point out that there is flexibility here and feedback is welcomed. Given that I have not even been able to get some straightforward questions answered I fear that not to be the case. An example that comes to mind is regarding references "You must obtain references for prospective tenants". The "must" is a problem here, it is not always possible to obtain references, eg, tenants coming to the UK or leaving home for the first time. Also, I believe it will be very difficult to get ex-Landlords to comment on anti-social behaviour for tenants</p>		
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	<p>moving here from outside the City as this is simply not standard industry practice.</p> <p>Some of the other conditions I find ludicrous, in particular section 2.1 regarding documents to be written in other languages. It appears you are asking for the most important document, ie, the Tenancy Agreement to be translated. This document would not then actually stand up in court, eg, for an eviction, so this condition is nonsense. My experience of renting in other countries is that the Tenancy Agreement has to be written in the language of that country. I do believe PCC need to check out the legal position on this proposal if they are to implement it.</p> <p>I do also believe the scheme to be somewhat fanciful. Section 8 (Number of Occupants) and Section 11 (Overcrowding) are going to be very difficult for a Landlord to comply with, without actually breaching their own Tenancy Agreement, ie, the right of tenants to quiet enjoyment of the property. I really do feel the Council will need to get involved in “policing” the number of occupants at a property, I simply do not have the resources available to me to monitor where in the house my tenants sleep.</p> <p>I am very concerned about Section 16 (Anti-social behaviour) as I have no idea how I am going to monitor and manage this. I do hope the Council will issue further guidelines and assistance to Landlords with regards to this requirement. I also believe the Council will need to provide more assistance to Landlords as regards rubbish separation and disposal. I don’t think it’s reasonable to expect private Landlords to pick up the cost here, so would welcome details of what resources are available in what languages etc.</p>		
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	<p>Section 17 (notification of change of occupancy) was discussed in detail at one of the meetings I attended and your representative was adamant that the Council wish to collate this information. Firstly, I don't believe it's up to Landlords in the City to fund analysis the council wishes to do, ie, this will surely involve employing a member of staff purely to process this data? If the Council want this information then it is up to them surely to fund the collation of such. Secondly, if there is a requirement, then surely it is only for HMOs as all single let information will be available to you through Council Tax records?</p> <p>I would also like to ask that consideration be made for a Pro-rata payment for houses purchased or disposed part way through the scheme.</p> <p>In summary, whilst I welcome any positive changes to the private rented sector in Peterborough, on this occasion I do not feel able to fully agree with the proposals put forward by PCC.</p>		
16.01.16	<p>Hi</p> <p>I tried several times to speak to someone on this, and one time I left a message on a voice mail without any reply.</p> <p>I tried to do the survey form on line, but most of the information needed to fill out the form aren't known to me.</p> <p>It is more appropriate for the tenant to fill the form. So, I wasn't able to do the form.</p> <p>If you want to talk to me on this, please call me on xxxx.</p>	<p>Ed to phone</p> <p>Message left 3/2/16</p>	<p>ES to respond.</p>

16.01.16	<p>Hi Ed,</p> <p>Apologies, this was an oversight on my part. Perhaps it would have been useful to have some background / accompanying notes about the fee structure, although I do acknowledge that this is my mistake. It is such a generous discount that perhaps this needs to be explained as a big benefit of the scheme in more detail on the Fees document. Many Landlords would never presume that a licensing scheme would be that reasonable in price! I hope that this email will suffice. If I need to resubmit then let me know, although this won't be today as I am out of the office.</p>	(See response sent on 02/02/16 by GG)	No further response required.
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