Awaab's Law: Consultation on timescales for repairs in the social rented sector

The consultation proposes that specific timescales for the remediation of all hazards under the Housing Health and Safety Rating System (HHSRS) are introduced into legislation, introduces a requirement to carry out inspections to establish the extent of any hazards in line with HHSRS where there is reason to believe that a hazard exists or where the tenant requests an inspection introduces a requirement to communicate the outcome of inspections to tenants within 48 hours of the inspection. The legislation also requires landlords to consider known or potential vulnerabilities within the household which may require a repair to be treated with an elevated degree of urgency than would ordinarily be the case. The proposals seek to increase transparency and enhance tenant rights whilst making the council or registered providers more accountable to tenants.

The outlined proposals will have a significant financial and resource impact on the current operating model and the Council will be required to assess whether the current service level agreements, operational capabilities and allocated budgets are sufficient to meet the enhanced thresholds required by Awaab's Law. Specifically, there are implied requirements around timescales and capacity that will may have wider implications on services' ability to deliver existing and proposed investment given the likely impact of the additional workload arising from Awaab's Law. The potential impact of the proposed changes are particularly stark for the Council, given the scale of retained stock and the current stock condition/Decent Homes compliance. The proposed legislation, extending beyond the damp, mould and condensation perspective into the wider HHSRS sphere, has significant potential implications to drive volume into repairs and to divert resources from the planned activities of delivering compliance and investment.

The consultation does not allude to any further funding to implement these measures (and in most cases implies that the financial implications will be "small" or minimal), but it is clear there will be a significant cost associated with the changes to the operating model and the reduction in time to assess and respond to hazards within the home, particularly for a landlord of the size of the Council. The profile and publicity around Awaab's Law is likely to drive significant additional customer and third-party demand both around inspection/remedy of reported repairs and challenge arising from non-compliance with legislative requirements when the legislation as proposed is implemented.

Whilst the Council welcomes Awaab's law and acknowledges that there are significant improvements that can be made in relation to inspection, treatment and response to identified issues, the proposed legislation as consulted introduces significant additional pressures that will have wider impacts on the Council's ability to deliver planned and necessary improvements across the portfolio which may negatively impact on wider service delivery.

Proposal A: Changes to HHSRS (inclusion of all HHSRS hazards (currently 29 but proposed to reduce to 21, although all 29 current categories will remain within the revised 21 categories) as part of Awaab's law rather than "damp and mould growth").

Question 1 – Do you agree that Awaab's Law should apply to all HHSRS hazards, not just damp and mould? (Y/N)

Answer 1 – No.

Whilst the Council welcomes Awaab's law and recognises the need for a national, enforceable standard to address issues of damp, mould and condensation, the legislation as consulted goes significantly beyond the anticipated resolution of damp and mould issues and places significant additional financial and regulatory burdens on the Council that will be difficult to

achieve within current financial constraints without adversely affecting the Council's ability to carry out planned improvements to the benefit of all tenants. The Council would be more likely to support this if there was new burdens funding associated with this that would enable up to scale up for delivery.

Of particular concern is the requirement to extend the threshold beyond the area of damp, mould and condensation to the (current) 29 categories as set out in HHSRS. These hazard categories cover a disparate and wide-ranging number of potential hazards, with the relevant levels of knowledge and expertise required to assess potential harms against each category differing dependent on the repair issue being reported and the Council's ability to identify or procure a relevant expert to carry out an assessment within the given limited timescales, particularly where the reported issue is outside of the "usual" repairs reported by tenants and may require the intervention of a specific expert or procured service that is not currently provided within the Council's repairs and maintenance service, or where the scope of the Council's ability to respond to the particular issue within the given timescales is likely to be outside the scope of the legislation as written.

Whilst the Council has increased repairs performance in relation to damp, mould and condensation and has ensured that future repairs contracts reflect the anticipated enhanced threshold required by Awaab's Law, there are areas that the Council respectfully considers are outside of its reasonable control, where it would not be possible to comply with the given timescales and where the Council would then be susceptible to challenge based on a failure to meet the enhanced requirements.

Examples of such instances would include where the perceived hazard is a result of antisocial behaviour (ASB) or noise nuisance from a neighbouring tenant, which has a significant impact on the mental health of the reporting tenant. Whilst the Council takes all reasonable steps to address and prosecute issues of noise nuisance or other ASB, it is in most cases unrealistic to expect the Council to be able to resolve these issues within the given timescales, given the corresponding timescales for resolving issues of ASB, including the need to present appropriate evidence to support a successful prosecution. In such cases, where the legislation as consulted requires the Council to offer a decant to an alternative property, this would appear to promote the removal of the victims rather than the perpetrators of any issue.

For instances where the issue arose as a result of a property outside of the Council's jurisdiction, for example a flood resulting from an adjoining property, the Council would again have limited scope to resolve the issue as an emergency repair or gain access to the property in order to resolve the repair in compliance with the consulted legislation.

The inclusion of the "crowding and space" element of HHSRS is also problematic. It is unrealistic to assume that a landlord could, on being contacted by a tenant experiencing overcrowding (where potentially there has been no contact from the tenant regarding their household composition changing for some significant time), carry out any works to remedy this issue within any timescale. The only available avenues of resolution in such cases would be allocation by way of the housing register, assistance to access alternative accommodation in the PRS, or if the conditions were perceived to be so prejudicial to the household, an assessment under the homelessness legislation to commence work to prevent or relieve homelessness. The distinction for this HHSRS element is so disparate from other elements where repair work is a reasonable remedy lead us to consider that this specific element should not be included in the legislation.

The proposed changes to include all HHSRS hazards will place a significant administrative and financial burden on the Council, both in terms of ensuring that there are sufficient

operatives able to carry out inspections as required, within the proposed timescales, and procuring ad-hoc experts where a specialised inspection relating to an element of HHSRS is required (a process that can take time and is likely to be impacted by the additional legislative demands on such experts within an urban area such as Birmingham with a significant number of Registered Providers).

The Council has recently committed to a significant programme of investment in its housing stock, both in order to achieve regulatory compliance following the breach notice from the Regulator of Social Housing in 2023 and to return the Council's stock to a compliant position of decency against the Decent Homes Standard. We are concerned that the significant additional financial pressures implied by the consulted changes will have a negative effect on the Council's planned change programme and will divert focus from a proactive service delivery model intended to improve living conditions for all tenants to a reactive service where resource and funding is diverted solely towards the additional burden of the required inspection and repair regime which we respectfully consider would not be in the best interest of tenants or financially viable in the long-term.

We consider that the scope of Awaab's law should remain that requested by Awaab Ishak's parents following his tragic and untimely death – to ensure that no other family suffers the same tragic consequences of a landlord's failure to take appropriate action to resolve issues of damp, mould and condensation. To extend this to all hazard categories under HSSRS, an inspection regime that is also applicable to social housing stock alongside any proposed new legislation, would impose an unreasonable and unsustainable financial burden on social landlords.

Question 2 – Do you agree the right threshold for hazards in scope of Awaab's Law are those that could pose a significant risk to the health or safety of the resident?

Answer 2 – Yes

We agree that the correct threshold for hazards in scope of Awaab's Law should be those set out at Category 1 and 2 of the HHSRS, specifically relating to the "damp and mould growth" category only.

As stated in Answer 1, we consider that the scope of Awaab's Law should extend only to Category 1 and 2 "damp and mould growth" hazards under HHSRS, or those cases where the hazard is likely to negatively affect the health of a household member irrespective of it constituting a hazard under HHSRS.

The Council is however concerned that the scope of carrying out an initial assessment under HHSRS may be difficult given that there is no requirement for tenants to update the Council on relevant changes in their household composition (such as the birth of a child), or any relevant change in the health or wellbeing of a household member (such as a household member being diagnosed with a breathing condition resulting from, or which could be exacerbated by, damp and mould). As such, at the point of contact, the Council may not in every instance have information available to enable a desktop assessment of the household's potential risk if this information has not been provided.

We consider that the presumption within the legislation that landlords will have up-to-date information on the household composition and wellbeing of all tenants (particularly for large stock-retained authorities such as Birmingham with 59,000+ properties) is unrealistic. We appreciate this may be a requirement of the proposed Consumer Standards, However, these have not yet been formally agreed or launched and landlords will require a period of time in which to achieve compliance. Whilst the Council can of course triage and respond

appropriately to those cases where this data has been communicated and is held, for cases where this data is not known, and cannot be accurately updated with the tenant at the point of the issue being raised, there would again be an additional burden in terms of obtaining this information in every case in order to carry out an initial assessment of potential harm based on the circumstances of the household, or a failsafe position of treating every such report as a potential case under Awaab's Law, again adding to the Council's burden to ensure that no potential hazards are missed.

We suggest that the threshold for hazards in scope of Awaab's Law are therefore those that could pose a significant risk to the health or safety of the resident, solely in relation to "Damp and mould growth".

Proposal 1: If a registered provider is made aware of a potential hazard in a social home, they must investigate within 14 calendar days to ascertain if there is a hazard.

Question 4 – Do you agree with the proposal that social landlords should have 14 calendar days to investigate hazards?

Answer – No

We consider that 14 calendar days is insufficient for landlords to respond to reported issues and that this should be revised to 14 working days.

The Council has published timescales for the response and resolution of repairs, however Awaab's Law as consulted would impose significant additional requirements to carry out investigations/inspections into reported hazards, which would place an additional burden on the ability to meet this target. This concern is particularly acute for local authorities with large retained stock numbers, where a specific target of this kind places a real terms additional burden on the ability to carry out the volume of inspections/investigations required within what is an arbitrary calendar target which does not take account for the Council's limited scope to use weekends (potentially 4 of the 14 calendar days) to carry out inspections, without considering bank holidays/school holidays etc where repairs operatives or contractors may be less available to deliver inspections/investigations at the scale required to meet the requirement. Whilst the Council has sought to innovate to improve response times, including weekend visits where necessary (due to working tenants etc), a blanket timescale of this nature will impose a significant additional pressure on the available resources to investigate concerns. Many providers are tied into contracts with third parties/contractors which do not provide the flexibility to impose specific timescales for investigations, and the lifetime of these contracts may extend way beyond the planned implementation date of Awaab's Law, leaving landlords unable to either renegotiate contract terms or facing additional costs of revising contracts mid-term to accommodate revised legislative provisions.

The requirement to carry out investigations within 14 days will of course also place a significant financial burden on the Council, given the number of repair requests received each year and the potential for these to be escalated under the consulted legislation. Whilst the Council does not disagree that those instances where a full inspection is necessary or repairs are required should be investigated as a matter of urgency, there is ambiguity within the proposals which would require a significant upscaling of visits/inspections, which depending on the size of the landlords' stock may be simply unachievable.

The aim for investigations to be completed within 14 days also requires landlords to carry out an assessment where requested by the tenant, irrespective of the circumstances of the case. This limits the ability for the Council to act in an innovative way by triaging or prioritising cases

based on intelligence/data and placing the onus for specifying where an inspection is needed on the tenant. We consider that in most cases, irrespective of the level of disrepair or the urgency of the matter at hand, where tenants are aware that by requesting an inspection at the point of complaint the Council is "on notice" to carry out an inspection within a specific timescale, it is likely that such a request will be made. Similarly, where tenants reside in areas where legal representation is readily available it is possible that there will be a preponderance of such requests in the "right" legal terms to trigger an investigation/inspection, which removes the Council's autonomy in determining those cases of most urgent priority and also runs the risk of removing resources from those households who lack the will, awareness or capacity to seek legal representation or reference the relevant legislation to "trigger" an investigation – this decision should remain with the landlord based on the facts of the case rather than being a blanket trigger.

In Birmingham's case, given the volume of repair requests per annum – c230,000, even a moderate increase in the number of requests where an investigation/inspection is required would have a significant resource implication; the Council cannot realistically carry out inspections at even 10% of this rate, given that this would require in the region of 450 separate inspections per week in addition to the ongoing repairs volume required and the delivery of an ambitious and demanding investment programme. The Council delivers repairs and maintenance via contractors and an increase of even moderate numbers as required by Awaab's Law would place significant pressure on the Council's business plans and ability to deliver planned future investment.

We consider that as a minimum, this requirement should be extended to social landlords having at least 14 working days to investigate hazards, with 21 days (equivalent to 15 working days at worst) being a more realistic timescale.

Question 5 – Do you agree that medical evidence should not be required for an investigation?

Answer – No

The Council acknowledges that in many cases there should not be a requirement for a tenant to provide evidence of a causative link (in the opinion of a medical professional) between the condition of the property and any existing or possible health conditions in order to trigger an investigation, and the Council does not adopt a policy of requiring such evidence. We accept that a blanket policy in this regard places the onus on the tenant and increases pressures (both financial and operational) on health services.

We do however consider that to remove the link between medical evidence and the prioritisation of investigations misses the opportunity for landlords to effectively manage the allocation of investigation resources to those households where this may be most urgently required. Those who are genuinely and seriously impacted medically by damp and mould should be prioritised absolutely and the way in which Awaab's Law is being proposed dilutes the sense of urgency in relation to this.

Given the proposed requirements in terms of timescales for responding to requests and our own experience of tenants in many cases not providing information regarding changes in medical diagnoses within the household, there should not be an absolute removal of the link between a qualified medical opinion and the landlord's decision to prioritise investigative resources, particularly where (as in Birmingham's case), in excess of 250,000 repair requests are received per year and the correlation of these requests and known or newly available medical information enables the prompt and effective prioritisation of resources.

Proposal 2: Written summaries of investigation findings.

Question 7 – Do you agree with the proposal for registered providers to provide a written summary to residents of the investigation findings?

Answer – Yes

We agree that in most cases, where the threshold for an investigation to be carried out has been met, the tenant would then benefit from being clearly notified of the investigating officers' findings and the steps that the Council will take to resolve any issues identified.

Question 8 – Do you agree with the minimum requirements for information to be contained in the written report?

Answer - Yes

We agree in principle with the minimum requirements, subject to clarification on the threshold for an investigation and the associated timescales.

Question 9 – Do you agree registered providers should have 48 hours to issue the written summary?

Answer - No

We consider that the proposals give insufficient information on the 48-hour timescale. It is not clear whether this is an absolute timescale in all cases or whether the 48 hours includes weekends, bank holidays etc, where it would be reasonable to conclude that officers are unable to produce such summaries. We would also refer to the previously stated administrative burden of producing such summaries; whilst it might be achievable in many cases to produce a written summary, the requirement to carry out an assessment under all criteria within HHSRS and the associated specificity and complexity of some reports may make such a timescale unachievable. Where landlords are carrying out significant volumes of investigations, capacity issues may prevent the issuing of written summaries within 48 hours in many cases.

We would recommend a revision of this requirement to 7 days from the date of investigation to issue the written notice.

Proposal 3: Beginning repair works.

Question 11 – Do you agree with the proposal that if an investigation finds a hazard that poses a significant risk to the health or safety of the resident, the registered provider must begin to repair the hazard within 7 days of the report concluding?

Answer – No

Whilst we agree with this proposal in principle, the extension of Awaab's Law to all HHSRS categories means that this is not practicably possible in all cases. For instance, where the hazard exists due to overcrowding that the landlord was not previously aware of, there is no practical remedy that can commence within 7 days of the report concluding. Similarly, where the hazard occurs due to external factors beyond the landlord's control (ASB/noise etc), the correlating timescales for resolution of the issue may render it unachievable for the landlord to commit to "repair the hazard" within 7 days.

We consider that a greater degree of subjectivity is provided in relation to the timescale given for beginning repair, to specify that this relates to issues of disrepair only and where it is practicable and achievable for the landlord to carry out remedial works within the property to

remedy the issues rather than for those issues where no practical remedy can be offered within a reasonable period of time. This proposal could be amended to "**remedy** the hazard within 7 days of the report concluding" to resolve this issue.

Again, the text of the proposal implies that landlords will have both the capacity and ability to deal with a potential increased volume of repairs to commence works to rectify them within specific timescales; given the Council's concerns regarding the potential increase in reports of disrepairs in line with the legislation as consulted, this may have an impact on the Council's ability to respond to reports and commence works within a set timescale.

The legislation also does not address the responsibilities of landlords in freak or unforeseen circumstances which may make compliance with the proposals unachievable. Freak weather events, the likes of which are becoming more frequent, can affect a significant number of properties simultaneously. Where a landlord is faced with a situation of this nature, the legislation has to recognise that all of the relevant timescales may be unavoidably breached, as landlords cannot realistically plan for such events or divert the volume of resources needed to resolve them in line with the timescales given in the proposals.

Question 12 – Do you agree that in instances of damp and mould, the registered provider should take action to remove the mould spores as soon as possible?

Answer – Yes

Question 13 – Do you agree with the proposed interpretation of "begin" repairs works?

Answer – No

We consider that landlords should be required to commence works as soon as possible after the investigation has concluded and the tenant has been notified of the outcome. However, we consider that by applying a specific target in days this places an unreasonable burden on the landlord, particularly where it is not reasonable or practical to commence works within this timescale. The consultation again adds a lower threshold where work should be commenced than that proposed by the Awaab's Law campaign – removing the requirement to commence works within 7 days where there is medica evidence of a risk to the health of a household member. We consider that to apply a blanket minimum of 7 days to begin repairs works (when this is taken to mean an operative on site within 7 days) is too high a requirement, and that this should be amended to confirm that works should commence in a timescale commensurate with the nature and complexity of the repairs and the resources realistically available to commence these works.

We note that the consultation links the removal of mould spores as an indication of works that should be commenced within 7 days, which we are in agreement with, but this should be read in the context of the consultation as a whole seeking to require landlords to comply with all relevant categories under HHSRS rather than merely "Damp and mould growth" and that as such it is not realistic or reasonable to apply an indicative timescale for a relatively routine repair where the nature of the works required may be significantly more complex.

Proposal 5: Timescale for emergency repairs.

Question 15 – Do you agree that the registered provider must satisfactorily complete repair works within a reasonable time period, and that the resident should be informed of the time period and their needs considered?

Answer – Yes

Question 17 – Do you agree that timescales for emergency repairs should be set out in legislation?

Answer – Yes

Question 18 – Do you agree that social landlords should be required by law to action emergency repairs as soon as practicable and, in any event, within 24 hours?

Answer – Yes

Proposal 6: Decanting if the property cannot be made safe immediately.

Question 20 – Do you agree that landlords should arrange for residents to stay in temporary accommodation (at the landlord's expense) if the property can't be made safe within the specified timescales?

Answer – No

We acknowledge that in most cases, landlords should be able to resolve issues within a reasonable time. However, the timescales within Awaab's Law, and the reach of the proposals, mean that landlords may be experiencing a significant volume of requests, and carrying out a significant number of investigations.

The requirement to offer a decant where landlords are unable to comply with the set timescales places an unreasonable burden on landlords. In the case of Birmingham, with a housing stock of around 59,000 properties, only 2500 to 3000 lettings take place per year (inclusive of nominations from registered providers). The Council's housing register has in excess of 23,000 households, with in excess of 11,000 households awaiting assessment. It is not reasonable or practical for the Council to be expected to either maintain a stock of suitable decant properties in the event of the need to move tenants where the principles of Awaab's Law cannot be met, or divert properties meant for households from the housing register where these timescales are not met.

The proposed legislation is silent on "suitable alternative accommodation" however given the current pressures on temporary accommodation, with more than 4500 households accommodated by Birmingham under a statutory homelessness duty, there is no viable supply of alternative suitable temporary accommodation that the Council can call on to house households for short periods of time whilst remedial works are carried out. We consider this this proposal will place an unrealistic burden on both the available temporary accommodation for households owed a homelessness duty, and on the available housing stock for households in need.

There may also be circumstances where households are content to remain in their accommodation, in the knowledge that they have written assurance from the Council regarding the repairs that will be carried out and the timescale for these repairs. Again, we consider that to impose moves from properties to temporary accommodation would be both counterproductive and unappealing to tenants, and the time and resources devoted to such endeavours could be better used in ensuring that the property is repaired to a compliant condition.

Proposal 7: Record-keeping.

Question 22 – Do you agree that Awaab's Law regulations should include provisions for a defence if landlords have taken all reasonable steps to comply with timeframes, but it has not been possible for reasons beyond their control?

Answer – Yes

Impact Assessment

Question 24 – Do you agree with the assessment that proposals 1, 3, 4, 5, 6, and 7 will create small additional net costs to the sector?

Answer – No

In relation to proposal 1, we consider that it is unrealistic to suggest that the potential costs are likely to be small. The Council carries out more than 230,000 repairs per year, to a stock of over 59,000 properties. Most of these repairs are carried out in time under the Council's repairs policy, having been appropriately triaged based on the severity of the issue. Awaab's Law as consulted seeks to require landlords in a significant number of cases to carry out a physical inspection of the property – whilst the Council acknowledges that the intent of the legislation is that such inspections/triages can take place remotely, we feel that the publicity surrounding this legislation and the requirement to carry out an inspection in all cases where the tenant requests this, will lead to a significant increase in the number of inspections carried out per year. Given the potential for a significant number of inspections and the consulted timescale, this will have significant financial implication for landlords in recruiting or appointing sufficient inspecting officers with the "right skills and experience" to carry out inspections, usually at short notice and potentially at weekends (with the associated premium) in order to meet the 14-day timescale. The number of categories under which an inspection could be required would presumably require the procurement of appropriate experts where the in-house expertise does not exist or capacity cannot meet demand. Procuring such resources in competition with other landlords also attempting to meet these timescales will also be likely to result in greater costs in order to ensure compliance.

In relation to proposal 3, it follows that we consider that beginning works within 7 days would have a cost implication for landlords. Whilst we currently have published repair targets and meet these in most cases, there is built-in flexibility to ensure that our repairs contractors are able to realistically meet these timescales. In the event that we are required to comply with this timescale in all cases where the need for remedial works are identified, this is likely to place significant pressure on the supply chain for both personnel and materials. We anticipate that the degree of scaling up required in order for us to be confident in meeting the proposed timescales would result in inevitable further financial pressures and a need to either identify additional investment or divert investment from existing programmed works, leading to delays for other tenants.

In relation to proposal 4, we acknowledge that the requirement to complete repairs within a reasonable amount of time mirrors the current requirements and that as such there are unlikely to be any significant costs, other than those associated with a potentially greater demand for inspections and subsequent repairs.

In relation to proposal 5, we do not agree that the potential costs are likely to be small. The scope of emergency repairs given within the legislation is significantly greater than the Council's current position on repairs and includes elements that would ordinarily be treated as urgent but not emergency. The extension of the scope of emergency repairs, and the associated additional works required to meet the 24-hour target for such repairs as cited in the legislation have the potential to place significant additional costs on landlords in allocating sufficient resources to ensure that these timescales are met.

In relation to proposal 6, we again do not consider that there are no net costs associated with the proposal. Local authorities are under significant pressures in relation to homeless

presentations and the supply of suitable temporary accommodation. Housing registers are facing unprecedented demand from households often in unsuitable living conditions. The available stock to offer accommodation to these households, either by way of direct allocation or nomination via registered providers, is falling year-on-year. It is unrealistic to assume that local authorities are able to either maintain a stock of properties for use as decant as and where necessary, or that to offer properties whilst repairs are being carried out would not have a cost implication. Every property utilised in this way removes a potential letting from the available housing stock, increasing the time spent in unsuitable and costly temporary accommodation for other households. Where landlords face such pressures and are forced to offer procured temporary accommodation (B&B, PSL etc) whilst repairs are being carried out, there is again a financial implication for the landlord in meeting this additional cost.

In relation to proposal 7, we acknowledge that the stated best practice around record-keeping mirrors the Council's own processes and that there would be minimal additional costs in implementing the recommendations as written.

Question 26 – Do you agree with the assessment of the net additional costs of proposal 2?

Answer - No

In relation to proposal 2, there is insufficient information provided to enable landlords to follow the rationale for arriving at the given funding figures. The Council does not routinely issue written reports following inspections and this will place a further administrative burden on landlords, particularly given the timescales within which to do so. The legislation does not specify whether the given 48-hour timescale is exclusive of weekends and bank holidays; if this is not the case then landlords will be required to find additional costs to fund overtime working or additional capacity over these periods in order to ensure compliance. Again, when considering the relative size of the Council's housing stock and the current repairs demand, even if only 10% of reported repairs require a written report (either following a virtual or physical inspection), this would require the Council to issue around 450 written reports within any 48-hour period. The administrative burden of such a requirement cannot be ignored and we do not recognise the inference drawn in relation to costs within the proposals.

Question 28 – Do you agree with the assumptions we have made to reach these estimates?

Answer – No

Whilst we acknowledge the data used to arrive at these assumptions, we consider that given that Awaab's Law is introducing new threshold in relation to investigating, notifying and completing repairs, and in particular given the significant publicity around this tragic case and the implementation of amended legislation in response, using historical data as a realistic indicator for future demand is not valid. We consider that it is inevitable that the legislation as consulted will place significant additional financial pressures on landlords and that as such there has to be a reconsideration of the operational challenges and the associated financial impact of the proposed changes as the proposals as written are likely to create an unsustainable financial pressure for landlords at a time of already significant pressure for many.