

Draft Private Rented Sector Strategy

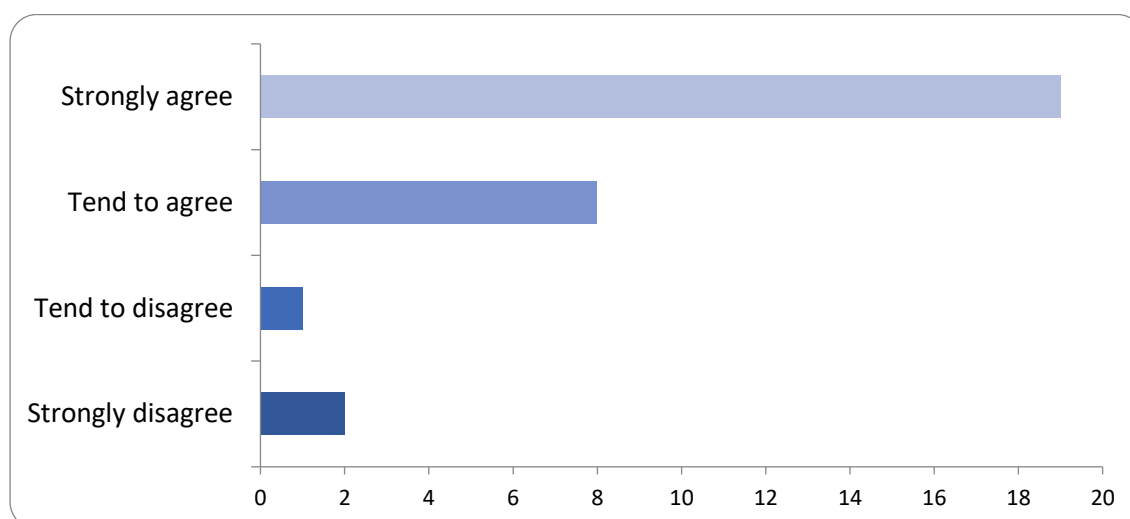
Consultation Feedback

Birmingham City Council (BCC) conducted a public consultation exercise about its draft Private Rented Sector strategy for a period of four weeks between 12 November 2021 and 10 December 2021.

In total, 30 respondents responded to the 14 questions included in the Be Heard questionnaire. Further responses were received from Council staff and Shabana Mahmood, Member of Parliament for Ladywood ward.

We propose that the vision for the new Private Rented Sector Housing Strategy for Birmingham should be “Achieve long term and sustainable improvements in the quality of private rented sector through engagement and regulation”.

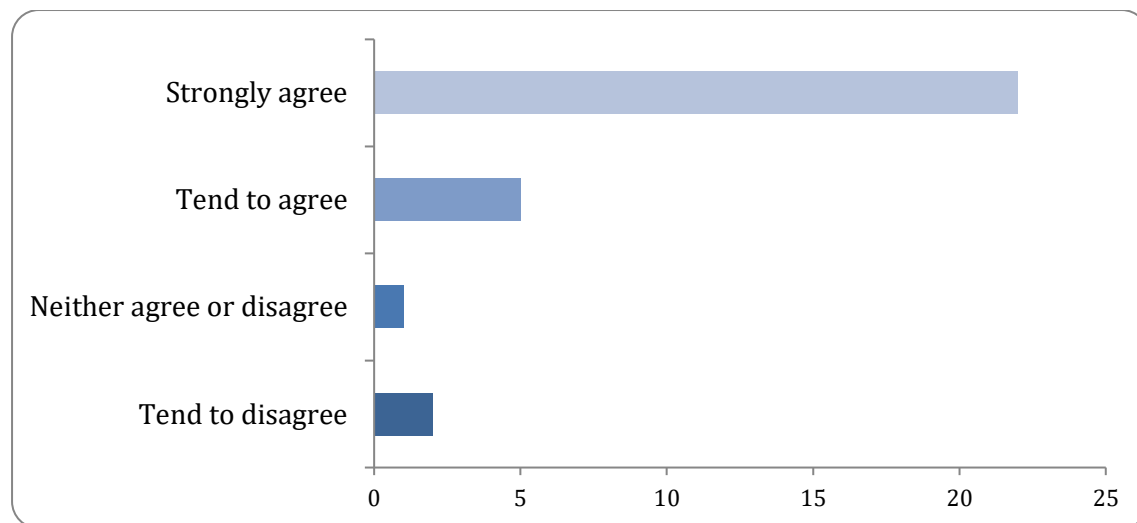
To what extent do you agree or disagree with this vision?



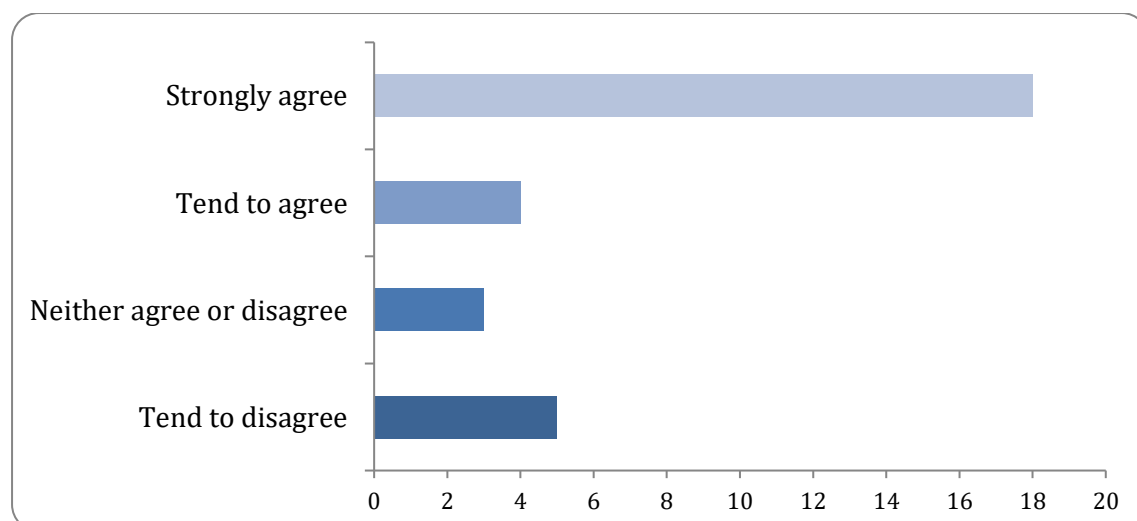
Respondents were asked to what extent they agree or disagree with the seven proposed priorities:

- 1) Increase the supply of safe and secure accommodation by bringing empty homes back into use
- 2) Identify and implement local initiatives to address local issues
- 3) Tackle disrepair and criminality
- 4) Prevent illegal evictions and harassment
- 5) Improve the energy efficiency of Birmingham homes, tackle fuel poverty, and reduce carbon emissions
- 6) Operate a high-quality mandatory Houses of Multiple Occupation licensing scheme
- 7) Seek to influence Government and national regulatory agencies to enhance relevant legislation and regulation.

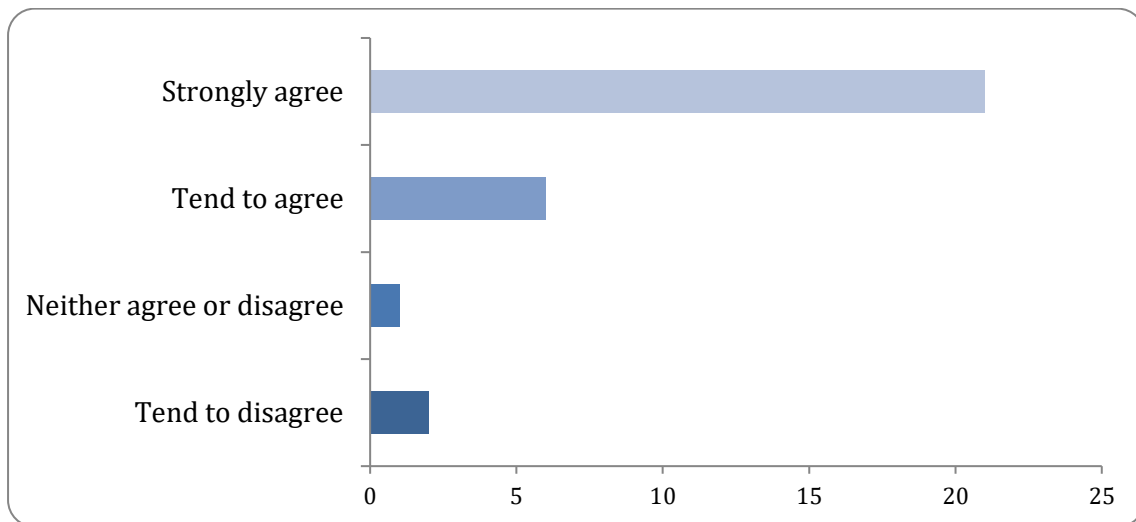
Priority 1 - Increase the supply of safe and secure accommodation by bringing empty homes back into use and delivery of our Empty Homes Strategy



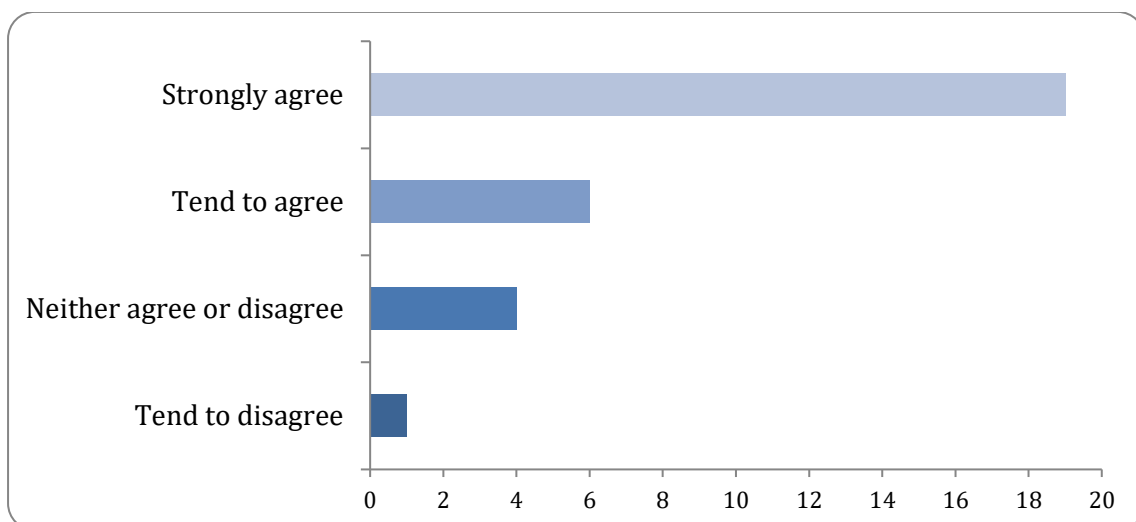
Priority 2 - Identify and implement local initiatives to address local issues including consideration of selective and/or additional licensing, and issues relating to exempt accommodation



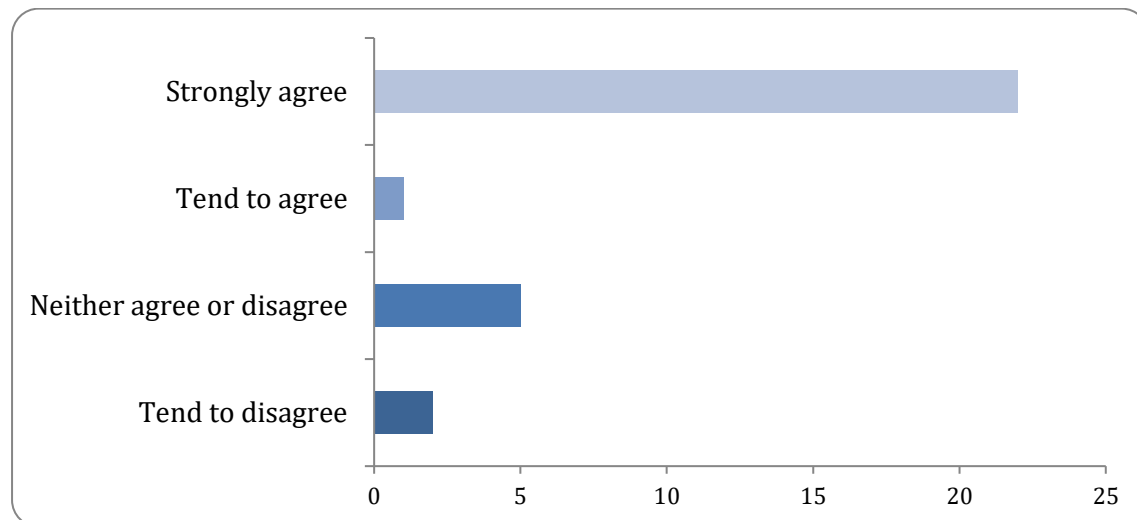
Priority 3 - Tackle disrepair and criminality – building on our partnership work, the role of the enforcement team, risk-based intervention (HHSRS), use of civil penalties, criminal prosecutions, proceeds of crime, rogue landlord database and providing a tenant's "Charter of Rights"



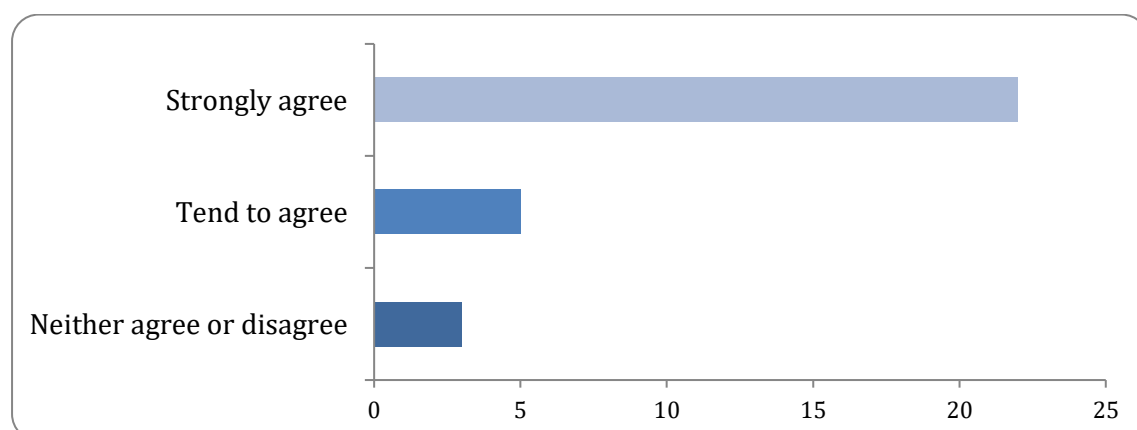
Priority 4 - Prevent illegal eviction and harassment – to support the Council's early intervention and prevention priorities.



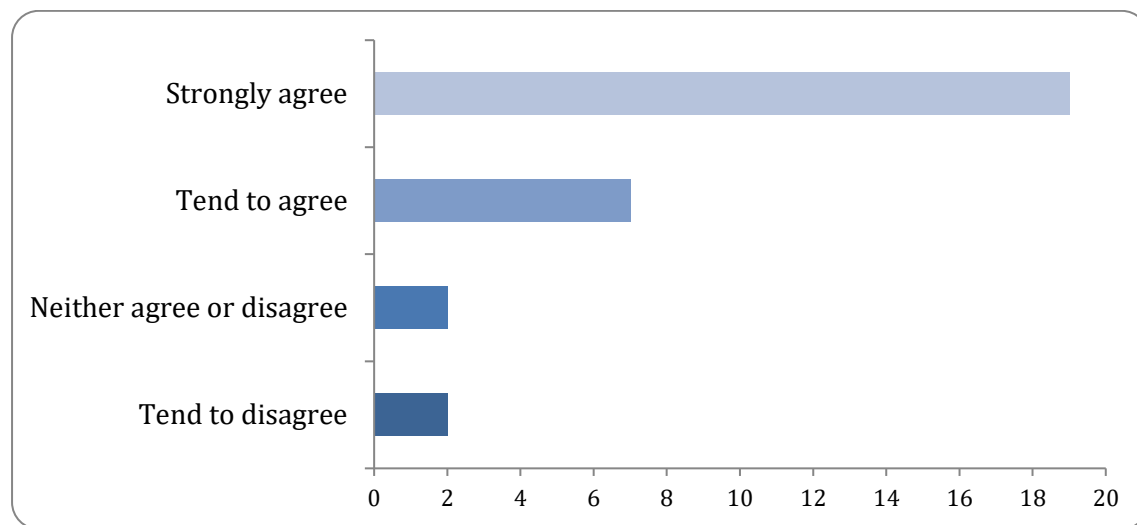
Priority 5 - Improve the energy efficiency of Birmingham homes, tackle fuel poverty, and reduce carbon emissions supporting grant schemes and advising/signposting both tenants and landlords to support organisations thus supporting improvements in some of the most energy inefficient homes in the city



Priority 6 - Operate a high-quality mandatory Houses of Multiple Occupation licensing scheme to ensure shared accommodation is safe and provides appropriate facilities to occupiers. Support a range of supportive accreditation, participate and facilitate landlord forums, offer training and website tools, tackling rogue landlords and joined up approach across the council other parts of council and partners



Priority 7 - Seek to influence Government and national regulatory agencies to enhance relevant legislation and regulation by proactively engaging in the national conversation and seeking improvement to relevant legislation



Respondents were given the opportunity to explain their answers to the questions above

There were 21 responses to this part of the question.

- All worthy aims, but (speaking as a conscientious landlord of 3 high quality properties in Northfield) I feel that great care should be taken to avoid alienating and disillusioning good landlords who are already leaving the sector due to increased legislation as well as higher taxes and rules that are becoming increasingly biased towards tenants. If you are talking to the government on a national level then it is imperative that the government invests more in social housing - most of the problems are as a consequence of problem tenants who would be better suited to social housing with none available.
- Landlords have been the wrong side of all the recent legislation. Red tape has increased and Covid has made it impossible to evict non-paying tenants. It is no wonder the good landlords are selling up. The rogue landlords never pay any attention to the rules anyway so they will carry on. So the private rented sector is shrinking and rents are increasing.
- What can you do in the face of these trends. Your objectives are laudable, but will they achieve anything?"
- Just fed up of awful housing I see in eg the B8 area. I walk past houses on college road by Ali shop. In an awful state. Tiles hanging off outside. Look in such bad repair. Then find out all the houses are on rent.
- Know loads of landlords and not one of them even pays tax. Cash in hand and tenants keep the houses and area so dirty.
- Fed up of it all in B8 as so many people have moved out and rent out the houses. The area has become so dirty.

- Want landlords to make sure the houses are kept clean by the tenants in same way. If they are not paying taxes on rent then they can sell houses and genuine people who need homes can buy.
- I am living in an area of very high hmo housing lots lots of problems drug drinking fighting I am fed up and scared to go out day or night
- Exempt accommodation needs to me properly controlled and thus I question what and why exactly they are "exempt". The potential for problems arising is significantly different between HMOs and Exempt accommodation. Don't tar both with the same brush!
- I understand that there already exists all the legislation you need without the need to add additional levels of complexity and cost. I don't want good landlords to have to bear the burden/cost of pursuing the bad ones.
- The new licensing proposals across Birmingham seem to offer no discount to accredited & qualified landlords. Why not when your intention is to incentivise the better landlord? Bad landlords always try to fly under the radar and will not be stepping forward any time soon, it is the good ones that will pay as is usual. We need targeted efforts not grand statements and a broad brush approach."
- Legislation already exists for you to ensure that illegal evictions do not take place. Is there any reason why the Council isn't enforcing this on rogue landlords?
- Legislation already exists in terms of minimum EPC ratings to ensure homes are energy efficient. Is there any reason why the Councils aren't already supporting the green agenda. Surely it should have been part of the strategy that all houses need to become energy efficient, not just rental property. Surely ALL home owners should be supported with grants etc to make all properties energy efficient. Focusing on rental properties will not help you achieve your targets.
- HMOs are already licensed, the quality of the licensing should be driven by your Officers currently.
- Increased legislation and licensing, leading to higher costs will drive the good landlords away who already comply and also increase the cost of renting. The tenants of Birmingham will suffer long term as there won't be sufficient private housing stock. There is already a lack of supply of social housing. Surely your proposals should be looking at how the Council will meet the shortfall of social housing.
- Whilst there is rhetoric about working with Landlords, there is nothing in the proposals that support Landlords in keeping their properties at a high quality and safety. By that I mean, how are you protecting landlords from rogue tenants who don't pay rent even when they are supported with housing benefit or those that cause substantial damage to property. Where is the protection for the landlord in being able to evict these rogue tenants quickly and efficiently. Where is there a proposal to pay rent direct to landlord for everyone who is claiming housing benefit, where is the proposal that the rent to the landlord will not be recalled if the tenant makes a fraudulent claim.
- Landlords need protection and support as well so they can focus their energies and funding on providing a safe and energy efficient rental property not spend months having to evict rogue tenants and financially subsidising a roof over their heads. When will the

Council fine tenants who don't pay rent, when will they fine tenants who damage property and ultimately make it unsafe. You will drive good Landlords out, the rogue non compliant landlords will still be there. They will be under the radar.

- Living next door to a HMO one of the issues is the lack of normal day to day maintenance for example maintenance of fences and hedges, access to the sides of our property for maintenance (I live in a semi detached). In addition not regular maintenance of the external walls of the property, guttering etc
- I think the seven key aims are good points but however there is more needed to be done like vetting landlords, regular compliance checks and other investigation in to the HMO's to make sure they are legal and within the rules of the law.
- More protection for private tenants who live peacefully and long term. With no damage or trouble. We recently had a landlord change and the first thing he tried to do was change our contracts (to our detriment) and put the rent up. I understand its business for you but for us it's our lives. Come and meet us, talk to us. 8 homes of professional people who never miss rent. Don't treat us like scum because we chose to rent!
- For priority 7 you require many more officers as the system is so very far behind in the licensing of current HMO there's no way it can catch up and review what is current let alone out of date or unworthy of a licence."
- "You already have a HMO licensing scheme
- You already have the powers to prosecute LL but dont seem to care whatsoever about rogue tenants who cause misery in neighbourhoods
- A tenant who will cause ASB is not going to consider their type of tenancy before causing ASB
- A national register of LLs would work like it does for the security industry SIA, because having each council have its own is unwieldy and there is no consistency which is required across the board
- BCC is a mess and has no joined up thinking
- Residents of our small community feel very strongly that not enough is being done to regulate and implement mandatory licensing related to exempt accommodation.
- We have one such property in our community which is an eyesore to the area. Property is disgusting and does not have assisted refuse collection, bags of rubbish build up attracting vermin, because tenants don't put refuse out for collection each week, gardens are unkempt and overgrown. We live in a cul-de-sac.
- It had a change of use May 2021 from a three bedroomed home to four bedsits. No planning approval or registered on Birmingham HMO register."
- "Urgent action is required and a strategy is key for bribing this about to deliver a string vision for the role of private rented housing alongside other tenures in meeting housing needs and supporting local economies.

- I opted for strongly agree in all cases as the proposals are all essential to realising the vision and priorities in the strategy.
- There is a need for a wider housing strategy and a fit of this one in that and a progressive alignment of partners including the local authority, registered providers and private rented sector providers.
- The exempt sector within the prs sector needs absolute reform. It can not be tamed or regulated. Spending 200m of public subsidy in support of profiteering and exploitation of vulnerable residents is Dickensian and should be driven out of the city. This needs to be at the forefront of the strategy.
- To enable the strategy to be delivered there is a need for a single housing directorate with all functions and statutory responsibilities of the housing authority under one roof."
- Birmingham is home from birth, I want Birmingham to be the best place to live better than London or Manchester as much as I also love those cities and wish them well. I'm delighted to see the council making positive steps forward and connecting with us.
- All Talks... for many years rogue landlords have played with people lives, Money is so great that most HMO providers are becoming complaisant in dealing with homeless people. It's about time to get this mess sorted.
- I am concerned by the number of single occupancy homes being converted into HMOS and the lack of regulation around these properties. People who are vulnerable and/or have additional needs must have those needs met appropriately. At the moment many of these properties are solely about profit not the needs of the people being housed. This impacts not just on the residents of the hmo but can also impact on neighbours and other residents nearby. It is imperative that there are limits to the numbers of HMOS in a given area as they change the demographic of a residential neighbourhood and it is also imperative that they are regulated and residents given all the support they need.
- "My Ward has a lot of hmos and exempt accommodation and the number is rapidly increasing to the detriment of the area. There is a loss of family homes to rent and buy. Residents are afraid to oppose planning applications for hmos as they are withdrawn and property turned into exempt housing. Police are regularly attending some of these premises because of anti social behaviour.
- It is difficult to take issue with any of the 7 priorities as a direction-setting private rented housing in Birmingham, and the direction is welcome. The challenges are in the implementation, and it is here that I wish to comment.

- Priority 1 - Introduces recurring themes re. implementation:

the need for multi-disciplinary working based on shared values and perceptions, which reaches down into some of the best practice in the current EA pilot; disciplines like the Police and Fire Service seeing it as their business to use the breadth of their local contacts to inform Council services of issues and behaviours they need to be aware of and to act on re. local properties, and further extending that reach by using intelligence from local residents and volunteers like Streetwatch and Neighbourhood Watch groups.

This is a way of thinking in professionals which requires constant refreshment e.g. as the officers in local Police teams change.

- the need for continuity, which follows from the above: the use of constantly changing agency staff won't deliver on the priorities.

- the need for imaginative and genuine engagement of local residents' commitment and expertise at all levels; tokenistic, process driven, engagement, which tends to assume that only the professionals know what needs doing, won't deliver the outcomes - residents need to be talking to central government, not just their ward councillor.

- Priority 2

The Selective Licensing Scheme needs to consider areas at sub-ward level to ensure that all localities which meet the criteria have been taken into account, and that the potential impacts of 'displacement' have been thought through.

The potential for exempt accommodation (EA) to come within the Council's regulatory framework in approx. 2 years' time needs to be anticipated. In the meantime there needs to be recognition of the strong finding of the EA Review that the impacts of poor quality EA/HMOs are largely indistinguishable for local residents – in practice it will not be viable for localities to live with a rigid Council distinction between the two.

The impacts of existing over-concentrations of poorly managed EA and HMOs in particular neighbourhoods have to be reversed, and the priority given to family housing in the Birmingham Development Plan has to be reasserted. Local residents need to be partners in assessing the viability of new EA as they are in other local authorities such as Manchester and Hull - and this needs to be linked to the Regulator of Social Housing's concern for implementation of the Neighbourhood and Community Standard.

Planning are currently preparing a Supplementary Planning Document that will mean that EA is included in the '10% calculation' for new HMO planning applications. It is critical that this is approved, and that Planning Officers apply it consistently.

The impacts of over-concentrations of poorly managed EA and HMOs in particular neighbourhoods have to be reversed, and the priority given to family housing in the Birmingham Development Plan has to be reasserted. Local residents need to be partners in assessing the viability of new EA as they are in other local authorities such as Manchester and Hull - and this needs to be linked to the Regulator of Social Housing's concern for implementation of the Neighbourhood and Community Standard.

An absence of joined-up working and local responsiveness in Planning led to EA being omitted from the '10% calculation' for new HMO planning applications. Planning has to be part of the kind of multi-disciplinary/locality-based approach to meeting housing need which will give local residents the sense that they can exert influence over the development of their area; currently they feel powerless.

The publicising of services needs to be integrated into every aspect of multi-disciplinary working, including local volunteers such as Streetwatch.

Speed of response has to be addressed or systems simply won't be used: it is a long time since the PRS reporting system has met its published timescales, and if this carries over into new systems they will fail.

- Priority 3

Need to check with other services such as Adult and Childrens Social Care, Health Visiting etc that they have sufficient awareness of health and social impacts of poor housing conditions, and of the referral systems outlined in the Strategy, to make referrals when needed and to uphold tenants' rights.

- Priority 4

As above.

- Priority 5

As above.

- Priority 6

As above - in particular consideration of areas at sub-ward level for Selective Licensing, engaging all disciplines and local residents in identification of issues like problematic waste disposal, ensuring accessibility and responsiveness of reporting systems.

- Priority 7

As well as seeking to influence, the Council needs an attitude of seeking to be influenced. The Co-ordinating Overview and Scrutiny Review of EA has shown the importance of looking at best practice elsewhere in order to challenge what can, in any organisation, become a habit of self-justification."

We do need to tackle rogue landlords and ensure private homes are safe, comfortable and energy efficient however you should not be looking to increase the amount of private rented homes. The increase in private rented homes pushes up the cost of housing (both to buy and to rent) and private homes are fundamentally precarious - even if Section 21 / no fault evictions were outlawed private contracts still tend to be short term, such as 1 year, after which a landlord can choose not to renew.

- I am a 25 year old renting a home in Harborne. Me and my partner have a combined salary of £70,000 but it's still not enough to buy a home as the houses here are ridiculously unaffordable. On the road I live on (Gordon Road) I would hazard that at least a quarter of the houses are owned by landlords. If you want people to stay in Birmingham and to have a connection with their local area then you need to tackle landlordism and create disincentives for more landlords buying up more properties. It has to stop! My house is full of mould and the letting agent won't do anything about it. I've never even met the landlord. It's a disgraceful situation and it most badly affects young people and those on low incomes. It is ruining the fabric of society."
- Too much anti social behaviour caused by residents of HMO's. Too many HMO's in inner residential areas where families live.
- Housing shortage in Birmingham so I fully support this proposal."
- Priority 1:

The Empty Properties Strategy needs to be joined up with the Council's Strategic Housing Market Assessment

https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper

which sets out the proportions of new homes by tenure and size. Which properties are prioritised, in which areas and of which size and tenure should be driven by the strategic housing needs of the city, as well as be focused on nurturing neighbourhood sustainability.

- Priority 2:

In terms of 'partnership' the model of multi-disciplinary working has already been used internally to a degree in the Exempt Accommodation Pilot. With its further development as a result of the review implementation (by including e.g. Adult Social Services in joint visits with HB officers, and making Waste Management part of the same team) the agreed Review Recommendations will develop this further. Best practice can be taken from here and elsewhere, such as including community safety and environmental health in a multi-disciplinary team.

However if 'partnership working' refers to external partners in the usual sense of the expression the Council needs to be much clearer as to who these are. At least they are not stated here.

- Priority 2 talks about working with exempt accommodation providers to improve management standards. BCC has now accepted in full the recommendations of the Scrutiny Committee report of Exempt Accommodation, so there should be resourced, joined - up working in this area from now on.

This final bullet point about working in 'partnership with local communities and elected members' is crucial. This cannot be done without functioning arrangements to address the needs of an area. Residents need to be able to engage genuinely in the development of planning policy, with a much greater effort being made by the Council to make planning law, regulation, policy and practice understandable to residents rather than a niche area accessible only to a few. Whilst planning decisions have to be made in line with the Council's Development Plan and SPDs, opportunities are being missed to engage with residents at the policy-making stage. This impacts both housing provision, and the wider character and amenity of the area.

Ward Forums are increasingly regarded as broken in some parts of the city. Councillor and community capacity can vary enormously with residents in some areas feeling that there is no response at all to their concerns either politically or from the Council. Ward Forums needs to be replaced or supplemented with workable and functioning structures to respond to the needs of residents across local areas.

- Priority 3

The link between building control and planning needs to be strengthened so that information is shared re new builds/conversions, especially in areas of high HMO concentration. A Tenants' Charter of Rights is essential along with strong enforcement against criminal and unsafe practices by landlords.

- Priority 6

It is surprising to see HMOs stated as 'potentially' leading to less community cohesion and making the area less popular with local residents' in priority 6. I suggest the deletion of this word as clearly the developments described – increased population density, greater demand on infrastructure services including waste management and parking DO lead to a reduction in community cohesion.

I would also suggest the following insertion:

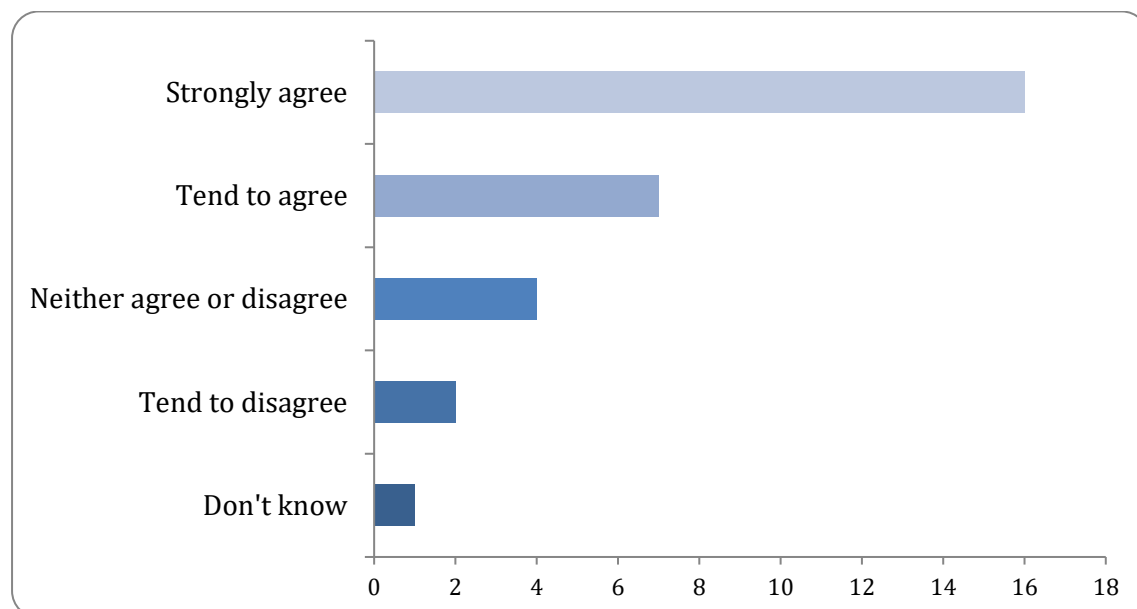
AFTER 'less popular with residents' ADD:

'The council introduced an Article 4 Direction to tackle the growing over concentration of HMOs within the city. This was to mitigate the risk of the continued growth of HMO accommodation, and in recognition that overconcentration of this type of accommodation destabilises areas. (Birmingham City Council Local Plan Development Management in Birmingham Development Plan Document Houses in Multiple Occupation Topic Paper October 2019)

One would not want to disagree with any of the 7 priorities. They are all much needed, but it's the implementation that will count. While some of the implementation strategies are fully outlined in the draft Private Rented Sector strategy document, there are some significant omissions in relation to engagement and regulation, especially in relation to planning.

Absent from the executive summary of the draft document is any mention of effect and impact of this (often poorly managed) sector on the wider neighbourhood. Neighbourhood impact, environmental crime and community cohesion figure subsequently in the priorities, so they should appear in the executive summary.

The proposed strategy has been informed by three Council wide themes, meaning that the actions developed through the strategy will reflect these wider objectives.



Who are our key partners in delivering this strategy?

- Landlords
- HMRC - Follow the money
- NRLA - They know our industry. True, they sometimes try too hard to please rather than standing up and shouting NO to government idiocy, but they are well placed to give good advice.
- Local council enforcement officers - They should have a better grasp of what is needed than some Whitehall Johnnie.
- Police - They must be logging all the antisocial reports.
- Landlords Forum - Already met with council staff to discuss issues of the day.
- Universal Credit Team - The process is broken. They need to be involved with any dialog if we are going to avoid more homelessness. You can't just expect landlord to engage with a system that prejudices against them when you have an eviction ban. Make sure rents are paid direct to landlords or permit them to evict tenants who don't pay. It's that simple!
- You seem to have omitted Landlords as your key partners. Agencies and Business but not all landlords are limited companies or businesses. We don't get treated as Businesses under S24 in respect of our operating costs.
- I'm all for having high quality rental property, but you need to support landlords and allow them to provide this without additional licensing schemes. There is already sufficient legislation for you to achieve what you are proposing.
- All citizens affected
- Universities
- Public Health
- Estate Agents
- Community groups
- Citizens Advice
- I think the key partner is the landlord and the associates with the landlords who may have all the information of the rented sector and should be transparent at all times otherwise imposed penalties for false information.
- The agencies are the biggest source of help to the sector to help those who may have problems living in this kind of setting and turning to crimes and other antisocial behaviour these people should be provided the provision of further help from the relevant authorities.
- The tenants, landlords and letting agents. Letting agents get away with murder! Illegal evictions, demanding additional rent raises etc when they shouldn't and bullying people into the threat of eviction. Some are cowboys like the one we have at the moment. Our new landlord clearly went for cheap. Which means cowboy tactics!
- Private landlords, of which your own forum didn't know this consultation was occurring. How can this possibly be acceptable?
- Private landlords house more families in Birmingham than any other sector, yet we are governed with increasing red tape even though the current laws are sufficient. Birmingham city council just does not have the manpower to manage.
- Private individuals / companies that know what they are doing and can deliver value for money which LSS fail to do time and time again
- Private Landlords
- Registered Providers
- Third Sector
- Private sector tenants

- Local authority particularly housing strategy, private sector team, regulatory and benefits teams.
- Landlords, tenants and other relevant internal and external partners
- Community led organisations
- Independent researchers
- The police, local residents, neighbourhood watch groups, housing associations, mental health and other support charities.
- Police, social services
- Landlords
- HMO management company
- Tenants
- Birmingham City Council
- Midland Housing and other such Housing Associations
- One key partner not mentioned is Building Control run by Acivico.
- Building Control information on properties needs to be shared with a robust planning department.

Are there any things you think are missing from the strategy and if so what are they?

- Maintaining the front garden and back garden must also be specified.
- If there is to be a rogue landlords database then it is only fair and reasonable that there should be a rogue tenants database too. It's far too easy for problem tenants to accumulate large debts (whilst protected by the system) and then move onto the next unsuspecting landlord with little or no consequence for them, but a huge debt for the landlord. I know personally of many good landlords who have quit, or are quitting, the sector as there's so little protection for good landlords. The current court system is massively inadequate and serves to offer no protection to good landlords from bad tenants and no protection to good tenants from bad landlords.
- A strategy for empty property that allows you to use them temporarily without preventing the future use of them by the owners, e.g. property for sale.
- Cleaner streets tackle student dumping rubbish.
- "Yes. See above universal credit is part of the problem. Absence of proper court facilities is part of the problem.
- Exempt accommodation is part of the problem.
- Citywide tax on on good landlords (licensing) is part of the problem.
- All of which disincentivise landlords which at the end of the day simply want to prove quality housing and be paid for their investment and not demonised for it.
- "A robust' advertising' strategy that informs tenants, landlords, estate agents, other citizens affected of what the expectations are of the rental sector.
- A hot line number for emergencies.

- Regulations of letting agents.
- Communication with landlords in an open and transparent way. Providing support and sensible offers of rent payment to engage landlords in providing housing for tenants who are in receipt of benefits.
- Joined up thinking.
- Link to wider housing situation
- Homeless prevention schemes
- There needs to be regulation about the number of HMOs in a given area or the risk is that a street can become largely multiple occupancy areas and because they tend to be transient occupants and the homes are not cared for adequately these streets lose a sense of neighbourhood.
- The housing sector is already highly regulated, and I don't believe adding more to this sector through policies and regulations would help at this point in time.
- I would propose that council should look at empowering good landlords to govern and improve their housings through grants and tax relief.
- No
- Preventing landlordism
- Too much anti social behaviour caused by too many HMO's in family residential areas. Too many drug users buying and taking drugs in inner city areas.
- A strategy based on the 7 priorities lacks strategic coherence as there is no mention of the Council's current planning priorities (Birmingham Development Plan 2031, passed at Full Council on 7th December) which commits to protecting the loss of single household family housing and ensuring that HMO accommodation does not become over concentrated. The strategy is silent on how the housing and planning functions will work together to achieve sustainable neighbourhoods. It is imperative that the Council adopts a multidisciplinary approach if the lessons from the Exempt Accommodation Scrutiny Review are to be learnt. Comment should also be made about how the Council's Article 4 Direction will be used to ensure neighbourhood sustainability too.
- Missing from the strategy as previously stated, is any consideration of the role of planning in raising standards within the PRS. The Exempt Accommodation Scrutiny report recommendation that the Council should conduct a Scrutiny Review of planning may assist by strengthening planning practices which prevent the over concentration of HMOs, which is often linked to poor quality housing. I hope that this Review will improve the quality of the PRS in Birmingham.
- Also not mentioned is the need for the PRS Team to be better resourced to meet its growing role in the light of the proposed Tenants' Charter and roll out of the Selective Licensing Scheme.

- There is no evidence that the strategy is linked to considerations such as:

The priorities of the Birmingham Development Plan passed at Full Council on 7th December 2021 which includes a commitment to meet specific targets in terms of the growth of certain housing tenures and bedroom sizes including the growth in particular 3 and 4 bedroom properties occupied by single households : Council's Strategic Housing Market Assessment

https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper (see pg vi)

The Council's Article 4 Direction, DM11 and the draft new SPD which seeks to restrict the development of HMO accommodation where this will lead to loss of family housing

The Council's commitment to neighbourhood working

https://www.birmingham.gov.uk/downloads/file/11839/working_together_in_birmingham_neighbourhoods_white_paper

How will the Empty Properties Strategy be repurposed to deliver the Council's Strategic Housing Market Needs and neighbourhood working. In some areas interventions will be needed to reduce the concentration of HMOs not bring them back into use where areas have excessive concentrations of HMO and EA properties. How will the Selective Licensing Scheme be used to meet the SHMN targets too?

Impact and implementation of the EA Scrutiny Review Recommendations at Full Council 7th December 2021. If implemented this will have a massive impact on the supply of Exempt/Supported Accommodation in the city and on neighbourhoods where there are over concentrations. Multi disciplinary working between the PRS Team and other services such as waste management and the EA pilot will be obligatory but none of this is mentioned.

Housing policy and interventions need to be targeted towards specific areas in line with its Housing Strategy (cross tenure) which is entirely missing.

The PRS Strategy reads like a list of individual interventions devoid of strategy housing priorities and has little recognition of neighbourhoods

Please provide any other general comments you would like to make in regard to the proposed strategy

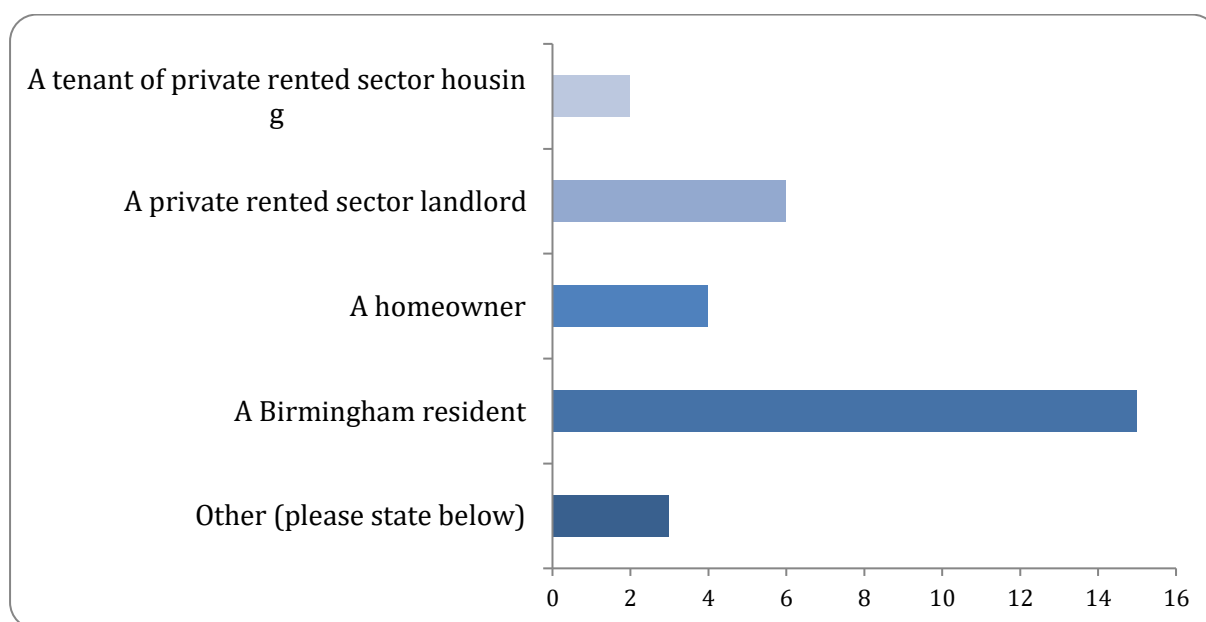
- On a local level, I believe that many problems are caused by landlords who advertise on Facebook, Gumtree etc, rather than through estate agents, physical or online. These are the kind of landlords who don't have meaningful contracts, don't maintain the property or carry out safety checks and who 'send their brothers round' if ever there's a problem from the tenant. If these landlords aren't allowed to advertise via these portals then they would be forced to do things the right way and a large part of the problem would disappear.

- It should be possible to have a low cost system to deal with disputes between neighbours, e.g. noise. For example, each resident chooses a person to be a judge. The two judges choose a third one. The 3 judges hear the evidence and make a decision. The two neighbours have to agree to abide by the decision. The judges would not be paid but would do it for the good of the community.
- Just please push for the areas to become more cleaner
- I hope it comes sooner than later
- I think Birmingham City Council is proposing this as a money making exercise. They are looking to introduce local licensing which Landlords will be charged for but there will be little or no improvement. The devil is in the detail.
- HMOs are already licensed but by your own admission they are not of a high quality. Why the heck not if your Officers are doing the job properly. The same will happen with selective licensing. You already have the ability to ensure that tenants are living in a safe environment by ensuring that environmental health enforce repairs etc by landlords. It is madness."
- I think further intelligence in to this sector is greatly required this could be the way the landlords might give out a wrong information which infact should be shared and the resident living at the HMO's have background to criminal behaviour and antisocial issues there matter need to be address and appropriate action taken and if possible impose penalties who fail regulation.
- There also needs to be a urgent provision of waste collections for these properties as they are a general cause left for flyipping.
- The most important point to raise is to sort of living accommodations should have real time information shared with the local authority or face fines as real time information help to see any issues.
- Those who fail to declare correct details or withhold information has breach in itself
- You have so much information that you as a department have not chosen to use. All that happens is another officer arrives and the previous information is not shared. They start from the baseline, meet with, and receive education from motivated landlords and then move on!!
- All the paperwork should be shared. This is a repeat."
- On energy efficiency in private rented housing, we are starting from a fairly low baseline. A minority of landlords are starting to see improving energy efficiency as a priority, but there is little or no incentive for most landlords at this stage other than the MEES. The priority needs to be to start with those landlords who are most willing to improve the energy efficiency of their homes, give them access to expert advice, connect them to funding opportunities e.g. LADS, and use them as exemplars to convince other landlords of the business case for improving energy efficiency. The consortium approach of the WMCA is in my view the best way of making this happen. We need to ensure that on forthcoming funding rounds, we identify private landlords

in Birmingham who are willing to be part of consortium bids bought together by the WMCA.

- Excellent work keep it up!!!
- Housing is the bedrock of social integration. People turn houses into homes, Unless their view are valued, their needs responded to in a appropriate manner, all the good intention and effort are most likely to fail. We need a different approach in tackling this revolving door syndrome.
- The housing sector is already highly regulated, and I don't believe adding more to this sector through policies and regulations would help at this point in time.
- This strategy does not go far enough to protect landlords, however it seems it goes too far for tenants which I believe it is not very reasonable and just.
- I would propose that council should look at empowering good landlords to govern and improve their housings through grants and tax relief.
- Number of HMO's needs to be restricted
- This consultation is much needed, but has been poorly publicised and not shared actively by councillors in affected areas. This is regrettable as it undermines the Council's stated commitment to "seeing communities as the source of solutions".
- I would suggest an extension to this consultation with a road show round the Ward Forums and Constituencies plus direct engagement with key housing partners if not already done.
- As well as a strategic approach, implementation is vital is this policy is to have an impact. Critical issues that require addressing include:
 - The current under resourcing of the PRS Team needs urgent addressing?
 - The EA Pilot needs to be resuscitated at local level - how will the PRS teams work alongside the local teams?
- Will the Council revitalise its housing strategy function so that individual initiatives are aligned to strategic goals and improve neighbourhoods not just properties.
- What plans are there to both target the worst areas and protect those areas which are becoming increasingly vulnerable? How is this being strategically planned?
- I would suggest that the PRS Team reviews best practice in other authorities.

Please tick which best describes your interest in this consultation



In addition to the feedback received via the Council's consultation hub "Be Heard" Shabana Mahmood MP, Member of Parliament for Birmingham Ladywood, submitted the feedback below.

Re: Consultation on the Private Rented Sector Strategy for the City.

Everyone deserves to live in a safe, warm and decent home. For thousands of people across Birmingham, that right hangs on the supply of suitable rented accommodation, managed and maintained properly by individual landlords and letting agencies. This response to the consultation on Birmingham's Private Rented Sector Strategy 2022-2027 is informed by ongoing casework and community campaigning in my role as the Member of Parliament for Birmingham Ladywood.

Priority 1 - Increase the supply of safe and secure accommodation by bringing empty homes back into use

I welcome the work to bring back into use any long-term empty properties within the city. Bringing empty housing stock back into use will reduce criminality, including fly-tipping and drugs use, and improve the appearance of our neighbourhoods. I support the target of bringing 400 empty properties back into use each year, and would request that the Council publish data outlining which wards and constituencies have the most empty property reports in order to inform their strategy.

Priority 2 - Identify and implement local initiatives to address local issues

Implementing a selective licensing scheme, which I have long called for, should be the main priority for the Private Rented Sector Strategy. Houses of Multiple Occupancy, which are a continued source of casework for my office, should also be considered for additional licensing requirements. I welcome ongoing work into the exempt accommodation sector,

which has grown significantly in my constituency and the wider city. Local initiatives should also include working with campaigning groups, such as Citizens UK and Shelter's Birmingham Campaign for Fair Housing, to identify systemic problems in housing provision in the city and work to tackle them.

Priority 3 - Tackle disrepair and criminality

I support the introduction of a tenant's Charter of Rights in order to help tenants and landlords understand their rights and responsibilities. However, it is crucial that any such charter is enforceable and not just a document set to collect dust on the Council's website. The Council should use the full range of legislative tools at its disposal to take action against rogue and negligent landlords, and be able to provide tenants with sound advice when considering action.

Priority 4 - Prevent illegal evictions and harassment

I would like the PRS strategy to further examine the link between withdrawal of enhanced housing benefit for exempt accommodation units and subsequent evictions. Where the supported exempt team at BCC are withdrawing enhanced housing benefit from a provider, there must be the right support systems in place to help vulnerable tenants transition out of that accommodation, during what is often a gap in provision of welfare benefits such as Universal Credit. There is a concern that there will be a rise in homelessness should this continue, as evictions increase due to withdrawal of enhanced housing benefit.

Priority 5 - Improve the energy efficiency of Birmingham homes, tackle fuel poverty, and reduce carbon emissions

I welcome the above priority, and consider that BCC should prioritise those who live in wards and constituencies most affected by fuel poverty.

Priority 6 - Operate a high-quality mandatory HMO licensing scheme to ensure shared accommodation is safe and provides appropriate facilities to occupiers

As per priority 2, I consider this to be of the utmost importance for Birmingham's Private Rented Strategy. Associated problems with HMOs such as litter and dumping, antisocial behaviour, and other criminality persists across the city, and a licensing scheme would go some way to addressing this issue. However, as always this must come with proper funding for enforcement and investigation, in order to have a net positive effect on our neighbourhoods.

Priority 7 - Seek to influence Government and national regulatory agencies to enhance relevant legislation and regulation

I welcome a continued partnership with Birmingham City Council to lobby the Government and regulators to improve conditions for those living in the Private Rented Sector. My ongoing work on the exempt accommodation sector will continue, as will calls for landlord licensing and stronger regulation of the private rented sector.