



Climate Action briefing on Leicester City Council's Landlord Licensing consultation from a climate perspective. Jan/Feb 2022.

This licencing consultation closes on 22nd Feb '22.

Leicester City Council is considering requiring private landlords to apply for a licence for the properties they let. This would mean they could require various conditions to be met which would improve the living conditions of people renting these houses. One of the conditions they are considering would require Energy Performance Certificates (EPCs) showing the property is E or above, and D or above from 2025. Not only would this improve people's lives, it would also reduce the carbon footprint of these properties.

Housing is responsible for 33% of the carbon emissions in Leicester. 35% of the dwellings in Leicester are privately rented and the Council has very little power to improve their energy efficiency. Landlord licencing is one of the few ways they can improved the privately rented housing stock – and if we are to tackle the climate crisis all housing needs to become much more energy efficient.

Please take a few minutes to respond to this consultation if you live or work in the city.

Use your own words – one paragraph written by you is given far more weight than a template letter used by many people.

If you are short on time the second and third points below are the important ones and you could do this in 10 minutes.

Most of the consultation survey is not relevant to climate action, so as always we recommend that you respond with a simple email unless you particularly want to use the survey.

You can send your response via email to consultations@leicester.gov.uk Make it clear in the subject line that it is your response to the Leicester Landlords Licencing consultation.

Make sure you include your name, address and postcode (a city postcode is preferable if you live or work in the city) with your consultation response.

You can find the consultation here:

<https://consultations.leicester.gov.uk/comms/landlord-licensing/>

The 11 page summary is here:

https://consultations.leicester.gov.uk/comms/landlord-licensing/supporting_documents/Discretionary%20licensing%20business%20case%20summary.pdf

and the 103 page main business case is here:

https://consultations.leicester.gov.uk/comms/landlord-licensing/supporting_documents/Discretionary%20licensing%20business%20case.pdf

Here are the points Climate Action suggests making from a climate perspective in our consultation responses.

1. **We congratulate the Council for including energy efficiency requirements** as part of their licencing system.
2. **We strongly support Selective licensing – Option A.**
 - We prefer this to Additional licensing because it would require all rental properties in an area to reach minimum energy standards, rather than just houses in multiple occupancy (HMOs).
 - Many single household rental properties have extremely poor energy efficiency, not just HMOs. We don't want to see HMOs penalised because the sharing of housing is an energy efficient option (and can be positive for a neighbourhood when the property is well managed).
 - The council could then bring in a new licencing scheme in 5 years to cover another area of the city with poor energy efficiency, and bring that up to standard.
3. **No matter what form of licencing they go for, we want the Council to require EPC certificates demonstrating that the properties are EPC band D in order to be licenced, and reach band C by 2025.** This is a band higher than the council are proposing. It is within their legal powers but would have to be agreed by full council.
 - Given the urgency with which we need to reduce carbon emissions by 2030, the current proposal of EPC band E now, improved to band D by 2025 is insufficient.
 - It's far more cost and carbon efficient to improve energy efficiency in a building all at once, rather than in dribs and drabs. Given that ultimately all homes will need to reach A or B standard, a minimum requirement of D/C is more appropriate.
4. **A clear and effective enforcement mechanism is needed** to ensure that properties in the lower EPC band do actually improve to the higher band required by 2025.
5. **Substantial licence fee discounts should be available to housing in EPC band A, B and C.** This would encourage landlords to make improvements beyond the minimum requirements.
6. **The council needs to distinguish between untidy green gardens and untidy dirty gardens (green or otherwise) which are a hazard to residents and neighbours.** We don't want these licencing measures to result in further paving over of front and back gardens.
 - Green gardens are not only important for biodiversity (which is under pressure from climate change), they also reduce overheating during heatwaves and flooding – both of which are going to increase as a result of climate change.
 - The existence of green and wildlife is particularly limited in low income areas such as those focussed on by these licencing plans, and increasing green in these areas should be a priority.