



Dear Leicester City Council,

This is Climate Action Leicester and Leicestershire's response to your Landlord Licencing Consultation.

We are very strongly in support of you introducing selective licencing for all rental properties in order to ensure that housing is brought up to meet at least minimal energy efficiency standards. This means we support your option A.

We are deeply aware that the people who end up living in these shoddy, cold rental homes are also the people who will inevitably suffer most as climate change worsens. They have the fewest resources, often poor health, and less capacity to deal with heatwaves, food shortages, storms, and all the other things which are going to result from worsening global heating. They also tend to be the people who have contributed the least to carbon emissions due to their low incomes.

It is excellent that you plan to include [a requirement for requiring](#) Energy Performance Certificate band E, going up to band D as a condition of licencing rental housing. We definitely want to see you requiring basic energy efficiency standards, irrespective of whether you end up going for additional or selective licencing. However, we are aware that you do have the capacity to require higher than EPC bands E/D, and we strongly recommend that you do this.

- **Suggestion 1: Specifically we recommend that you require EPC band D in order to receive a licence, and that by 2025 you increase this to band C.**

Obviously given the huge drop in carbon footprint needed to keep the world below 1.5°C of global heating, and therefore the drop in energy use we need to see in Leicester, we have to ensure that all homes are quickly made much more energy efficient. The bulk of these changes need to happen in the next 5 to 10 years – if we wait until 2050, it will be too late. Therefore measures such as energy efficiency requirements need to be put in and enforced quickly and applied to everyone – including rental housing.

- **Suggestion 2: We want to see a clear and effective enforcement mechanism put in place to ensure that once licenced at EPC band E (or D as we would suggest), properties lose this licence if they are not then improved to EPC band D (or C as we would prefer) by 2025.**

Installing energy efficiency measures is both much more expensive for the landlord, and much more disruptive for tenants if it is carried out piece by [peicepiece](#) instead of all at once, so we want to see your licencing scheme supporting swift and substantial action in this area.

- **Suggestion 3: in order to encourage and reward action in this area, we would like you to offer substantial discounts to the licencing fee for rental properties which are band A, B and C.**

We do NOT want to see licencing only required for HMOs for the following reasons.

- Firstly, as much rental housing as possible needs to be made energy efficient. While [HMOsHMOS](#) may often be among the least energy efficient, there are also hundreds of homes rented to individuals and families which are [veryappallingly](#) badly insulated. Everyone living in rental housing should be able to heat their homes. Everyone also

needs to be able to reduce their carbon footprint. Draughft, uninsulated housing makes this extremely difficult.

- Secondly, we do not want HMOs to be singled out as if they are always a bad thing, which is what additional licencing does. In reality people sharing houses, resources, possessions (which is facilitated by HMOs/HMOS) gives them the potential to have a much lower carbon footprint than people living singly or in small groups. Additionally, the skills one can gain from living with others about communicating and looking after each other are skills we need as many people as possible to learn, to cope with the coming changes caused by global heating. HMOs are a part of the solution if they are well set up and supported.
- **Suggestion 4: In addition to supporting the introduction of selective licencing in the areas covered by option A, we also want to see you -introduce a new selective licencing scheme in areas not covered by the proposed scheme once the homes in the current scheme area have been improved.**

Over time we'd like to see you moving selective licencing to all parts of the city so that all rental houses are eventually given improved energy efficiency.

Finally we want to raise a concern about the licencing requirements you are proposing in relation to what you term "untidy" gardens. While dirty gardens and yards can be a health hazard and problem for neighbourhoods, just because a garden is untidy does not automatically make it a problem.

Untidy green garden which are kept clear of rubbish but allowed to grow trees, brambles, nettles etc can be extremely beneficial for neighbourhoods. The areas you suggest your selective licencing area cover are deeply lacking in green spaces, and every small green oasis in them reduces flood and urban heat island effects as well as increasing biodiversity. We do not want to see your licencing scheme resulting in further paving over of front yards and gardens for the sake of tidiness. This is problematic for the local neighbourhood as they become less resilient to climate change. Additionally, people who live in these grey paved over areas have poorer mental health and more air pollution than those privileged to live in greener areas. Living green gardens can help with this.

- **Suggestion 5: make it clear in your licencing scheme that the council supports green gardens which are unkempt so long as they are kept clear/clean of rubbish and litter. It may be easier to keep paved yards and gardens clean, but it is also bad for the environment and reduces resilience to climate change.**

Finally we want to say again that we strongly support the introduction of a selective licencing scheme which requires basic energy efficiency levels to be met.

Best wishes,

Zina Zelter and Michael Taylor and ~~Zina Zelter~~
on behalf of Climate Action Leicester and Leicestershire.