

Section 1: General Comments

Respondent Number	Summary of Comment/s
1	I'm OK with the changes if other landlords are.
2	The regulations are being made more complex; these changes will make student accommodation more expensive, so poorer students will only use landlords who don't abide by the regulations; the changes are placing more of a burden on landlords at a time of economic crisis; the Code should encourage landlords to accommodate more than one student per room; the Code should only set minimum standards; something should be included into the Code about tenant behaviour and the need for regular rent payments
6	Membership of the Code should only be open to landlords whose properties meet with the minimum statutory regulations; the increased requirements of the Code will make accommodation more expensive and less affordable for poorer students; any requirements that go beyond the statutory minimum should be optional, with stars awarded for the elements that are above these.
10	The requirements of the Code are becoming too onerous and mean that landlords are spending less time keeping up with general property maintenance
11	The new Code should include as many new requirements on environmental standards as possible, including insulation, energy efficiency, white goods and garden maintenance.

Section 2: General Comments on Specific Sections of the Code

Respondent Number	Summary of Comment/s
4	The requirement to fit control panels for fire alarm detection systems will mean that owners have to rip out existing systems and replace them with one compatible with a control panel.
7	Although I support the idea of emergency lighting for consumer units in cellars and under stair cupboards, it is not always necessary for consumer units situated in living areas. This just requires a wording change.
13	The WY fire service cannot enforce any other guidance than that it has agreed with LACORS, but could recommend a higher standard in some circumstances
15	The fire safety requirements should be the same as the legal requirement and a legal requirement supersedes a voluntary agreement

Section 3: Responses to Specific Clauses of the Revised Code

Respondent Number/s	New Code Clause Number	Heading or Sub Heading	Comment/s
12, 14, 17, 18, 21	2.13	Provide alternative accommodation if occupation is not possible at commencement of tenancy	Opposed to this, it will fuel a 'compensation culture'; Opposed, it's impossible for small owners to provide this; This should be removed as it might incite tenants to take action; This should be deleted as it will cause conflict between landlords and tenants; This needs further clarification on what is meant by a room not being ready – could it cover the cleanliness of a house and what happens if one room is being re-decorated and a tenant does not want to stay in an empty room in the same house as an alternative?
18	2.14	Written agreement from tenants that work can take place	It can be difficult to get all the tenants to sign something to say they agree the works can go ahead, so could this be amended to refer only to joint tenancies or simply state that only one tenant

			needs to sign.
16	3.00	HMO licensing	Wording should be altered to read <i>'within the timescales specified in the license conditions'</i> ;
16, 19	3.01	Overcrowding	Should add in <i>'having regard to the number of bedrooms available'</i> ; also need to add in the internal lay out clauses from the LLAS <i>'Properties, or parts of, are not allowed to be occupied if the internal layout is likely to be prejudicial to the health, safety or well being of the tenants or otherwise not reasonably suitable for occupation'</i> and <i>'Rooms that overall have an inadequate floor to ceiling height are not allowed to be occupied. There is no prescribed minimum height, but 2.1 meters would normally be considered to be satisfactory. Each case will be looked at on its own merits upon all the circumstances'</i> ; LACoRS have

			issued some guidance on overcrowding which is available from their website;
16	3.08	Repairs completion performance	Should add in 'decorative finishes to be made good within reasonable timescales if damaged or disturbed during repairs'.
3, 8	3.21	WC/Washing facilities	Agreed; Does the 2010 deadline supersede the requirements set in the HMO license?;
3,9, 22	4.04	CO detection in bedrooms	Agreed, should be compulsory; I see little benefit in this and think gas fires in bedrooms should not be allowed; Agreed, a good idea
3, 8, 22, 23	4.11	RCD protection	Agreed, should be compulsory; are these not compulsory already?; This is a good idea as RCDs highlight any problems with the wiring; I'm not sure this is necessary as it is now a requirement to install RCDs when electrical wiring systems are checked for their PIR.
3, 9, 21, 22, 23	4.12	Emergency	Agreed, should

		lighting next to consumer units	be optional; agreed, should be optional; Yes, unless its located near some source of natural light; Agreed; This is not essential and at best should simply be a recommendation, but could be compulsory where the units are in basements which lack any natural light.
19	4.13	Safe use of electrical appliances	The Electrical Safety Council has issued a 'Z card' giving tips on electrical safety in the home.
3, 19, 21, 22	4.16	Fire detection – small properties	Agreed; Make mention of the LACoRS fire safety guidance; are self-closers necessary on fire doors?; All 4 bed properties (apart from owner occupied) should have a panel fitted.
3, 8, 12, 18, 21, 22, 23	4.17	Fire detection – medium sized properties	Agreed; Don't think that control panels are necessary; Opposed to the requirement for a control panel, although accept it could be an optional extra; the control panel is above and beyond what LCC

			<p>are asking for and more than the legal minimum; are self-closers necessary on fire doors?; Fit a panel for all of these and fit smoke detection in all bedrooms as well. Permit owners to retain existing Victorian panelled doors as they are the equivalent to FD20 doors, there's no need for overhead closers, smoke seals or intumescent strips; Are FDs on living rooms necessary? Often the living room is not the route of escape and so this is an unnecessary additional cost.</p>
3, 22	4.18	Fire detection – large houses	<p>Agreed; Fit a panel for all of these and fit smoke detection in all bedrooms as well. Permit owners to retain existing Victorian panelled doors as they are the equivalent to FD20 doors, there's no need for overhead closers, smoke seals or intumescent strips.</p>

3	4.19	Minimum fire safety requirements	Agreed
3,5, 23	4.20	Fire protection in cellars	Agreed; what type of detector is needed in an unoccupied cellar (heat or smoke)?; Sometimes it is not practicle to do this, it can be difficult in some back to backs to fit fire doors to cellars
3	4.21	Fire blankets in kitchens	Agreed
3	4.22	Exit routes	Agreed
3	4.23	Risk assess need for emergency lighting on escape route	Agreed
3	4.24	Annual check on fire alarm system	Agreed
17	4.25	External door security	This needs to be reworded to prevent the removal of historic glazing from period external doors;
3, 5, 22	4.26	Thumb turn locks on external doors	Not certain that all external doors can be fitted with such locks; Is this really necessary in a property occupied by only 2 people?, if so can it be phased in?; Agreed
3, 9, 21, 22, 23	4.27	Letter box restrictors	Agreed; Agreed, good idea; We have never had a problem with break in via letter boxes, so this would be a timely exercise for little to no benefit for

			landlords and may lead to more thefts as unopened mail could alert thieves to the fact that the property is unoccupied; Agree with this proposal as it's easy to break in through a letter box; Should only be a recommendation, unless the risk is high
17	4.28	Window locks	The final two sentences appear contradictory, what is this clause trying to say?
5, 12, 22	4.29	Security grilles	Is it necessary to fit thumb turns to these in a property with only 2 people?, if so, can it be phased in?; These are essential to improve the security of external doors; Agree with the advice on these grilles
16	4.33	Burglar alarms	The previous requirement to inform LCC Environmental Health Services of names and addresses of key holders for these should be retained.
3, 9, 23	4.36	Low energy white lighting	Agreed, to be optional; Should be optional;

			Should only be a recommendation, unless it is a high risk area
3, 8, 9, 22, 23	4.37	Anti-climb paint	Agreed; This is going too far; This should only be optional and a last resort; This may not be needed where sash windows are in place; This should be a recommendation only, it would be better to educate tenants to shut windows and not leave valuable in view.
16	4.42	Handrails	This should be read ' <i>a handrail should be fitted on all staircases, internal and external, which consist of three or more steps</i> '
3, 18, 22	5.01	White goods	Agreed; Should just be a recommendation rather than a requirement; Agree with this as a recommendation
12, 22	5.02	Low energy lighting	Opposed to this, it should be optional at best; Agree with this but landlords should be required to provide these, not simply rely on the tenants using them
3, 22	5.03	TRV's	Agreed; Agreed,

			but tenants should be advised they only work if they keep room doors shut.
16	5.05	Energy efficiency improvements	Should add ' <i>all new and replacement boilers to be fitted in accordance with building regulations</i> '.
22	5.07	Re-cycling	This is a good addition.
12, 20, 22	6.00	Anti social behaviour	Agree with it in theory but there is little landlords can do about it; the UoL questioned whether the advice would include details of their helpline?; Agreed
23	6.04	Keep gardens free of waste and litter	The timescales of no longer than 14 days is unrealistic and the council's pick up service is unreliable.
22	6.05	Retaining soft planted areas	Agreed, could Unipol produce a booklet for landlords on low maintenance gardens
16, 20	6.06	Refuse bins	Should re-instate the old clauses 4.35 and 4.36 ' <i>All properties will be provided with refuse disposal facilities sufficient for the number of occupants as defined by Leeds City Council's Cleansing Department</i> ' and

			<i>'Owners will ensure that they inform their tenants of the need for proper refuse management and recycling. A separate leaflet for tenants is available on request.'</i> ; Re-instate old 4.35 and 4.36
12	6.08	To let boards	This should be moved back into the section of the Code that deals with marketing (section 2);
22	6.09	Conform to neighbourhood design statements	Agreed, thanks for including this.
12	9.00	Complaints	Add in 'or' after 'local resident'
12	Appendix 1 of consultation	Fire detection and alarm systems grid	Can overhead self closers be removed from fire doors in the lounge and bedrooms of smaller properties?
12, 16	Appendix 2 of consultation	Phased in timescales	Move all of these back to September instead of July and August; deadline for anti-climb paint should be August not July 2010
12, 16	Appendix 3 of consultation	Optional or Starred standards	Need to discuss such proposals in conjunction with changes to the starred system in general; Dusk to dawn white

			lighting should only be optional
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Key to Names/Organisations Responding to the Consultation.

Number	Name	Organisation/Position
1	Kerry Stewart	Landlord
2	Tony Chuter	Landlord
3	Chris Ross	Landlord
4	Cathy Starling	Landlord
5	Andrew Doods	Landlord
6	Ray Haq	Landlord
7	Steve Kettlewell	Landlord
8	Diane Barnes	Landlord
9	Robin Hudson	Landlord
10	Alan Gray	Landlord
11	James Monaghan	LCC Councillor
12	Colin Halliday	Landlord
13	Chris Haley	West Yorkshire Fire Service
14	Linda Massarella	Landlord
15	Mike Thorpe	Landlord
16	Peter Warneford	Leeds City Council
17	Peter Sheard	Landlord
18	Raj Patel	Landlord
19	Ruth Hammond-Laing	LACoRS
20	Amanda Jackson	University of Leeds
21	Sarah Powell (Pickard Properties)	Landlord
22	Janet Bailey	Landlord and South Headingley Community Association
23	Surjit Singh (Deu Estates)	Letting Agent