

Responses from Residents

Date	Name	Method – phone / letter / email	Query / Comment / Response
06/02/2017	Resident	Email	<p>We ask that you review, with some urgency, the boundaries of the proposed licensing scheme, as it is covering several streets with hardly any privately rented property, whilst bordered by streets that are heavy in private rented accommodation that have been excluded; and we respectfully request that you might look at this and amend your map slightly. We do not know if you have a numerical ceiling on the number of properties included, or whether the inclusion of streets was more arbitrary. In our opinion, it would make sense to tweak the boundaries slightly so that it covers streets that are heavy in private rented accommodation. We hope these small amendments might be possible.</p> <p>They are listed below:</p> <ol style="list-style-type: none"> 1) Roberts Avenue is almost entirely owned by Adactus Housing Association, as is the "odd numbers" side of Playfair Street (but not the evens which is mainly private rented.) 2) The houses on the section of Parkfield Street (near to Whitworth Park only) and Moss Lane East (the row directly opposite Whitworth Park) are all huge and over three storeys, so the private rented houses there are, or should be, already covered by mandatory license. <i>NB Moss Lane East from Maine Rd to Playfair St is almost entirely private rented accommodation not covered by mandatory licensing so this section would still benefit from selective licensing.</i> 3) The section of Heald Place from Hartlepool Close to Great Western Street consists largely of a sheltered accommodation block (Frank Hatton Court) and then what we think is nearly all social housing : 28 to 36 Heald Place, and Felling Walk which backs on to it (we are not 100% certain but suspect it these houses are almost entirely owned by One Manchester). <p><u>We estimate that out of the 77 houses in these described stretches of houses, no more than 10 are both privately rented and not covered by mandatory licensing.</u></p> <p>We believe it would make far more sense to remove these streets from the proposed licensing and instead, include:</p> <ol style="list-style-type: none"> 1) Deramore St (even numbers), 2) Crofton St (1 to 38) 3) the remainder of Acomb Street (up to Great Southern Street junction, both odds and evens.) <p>We are aware of at least 36 houses not covered by mandatory licensing and suspect there are several more. This small boundary change fits in well with the already existing proposed area.</p> <p>As further evidence of the need to include this section of Acomb St, we would like to make sure you are aware that: there have been several problems with rental accommodation here over the past few months that</p>

			<p>have been reported to the council, including ASB, a back wall coming down due to neglect, a sewage leak that the landlord was refusing to fix, fly tipping from landlords (or builders working for them). We understand from concerned residents that several landlords are uncontactable by them as these landlords use the Acomb Street address as their own address on land registry, even though they live elsewhere. This part of Acomb St has also been subject to three planning enforcement notices, which whilst not directly related to housing, is an indicator of the level of contempt with which some landlords are treating the area, and their view of it as a neighbourhood where you can "get away with it."</p> <p>Although we do not have information on any reports of problems on Crofton Street, we are acutely aware that the number of long-term residents has dwindled significantly. This means there are less likely to be people "keeping an eye out" for problems, resulting in under-reporting, and feel it would be of benefit to the area and of use to the pilot scheme if the council were to include this in the licensing scheme.</p> <p>In summary, in order to cover streets with housing that fits the criteria for selective licensing, and to avoid wasting it on streets without smaller private rental houses, we believe it would make sense to adjust the boundary so that it goes along and includes 1- 47 Ossory Street, 319 to 303 Great Western Street, Playfair 2 to 10 (evens only), Moss Lane East down to Maine Rd junction, then as proposed with Fairbank, Haydn, Ruskin Avenue and Maine Rd, but incorporating the remainder of Acomb Street (both sides), 1-38 Crofton and the other half of Deramore Street, so the boundary line goes along Great Southern Street to where it joins the existing boundary proposal at the top of Santiago St. Great Southern Street, in itself, is mainly social housing so the boundary would not necessarily need to incorporate those properties.</p>
15/02/2017	Resident	Letter	<p>Thank you for your correspondence dated 03rd February 2017. As a home owner on Brompton Road I have to strongly disagree with your proposal.</p> <p>My house is kept clean, neat and tidy, as are the vast majority of properties on Brompton Road and indeed this was an influential factor in buying the house in a street that I felt 'stood out' in the area by virtue of general cleanliness and character. I'm sure that anyone with eyesight and common sense who bothered to properly audit the area would agree. So why penalise Brompton Road?</p> <p>Aside from the above, on a broader point, the five "conditions" you have listed are indicative, indeed symptomatic of a kind of 'social malaise' that is definitely NOT the fault and responsibility of the landlords, but the responsibility of the individuals concerned as in perpetrators – for antisocial/violent behaviour, fly-tipping etc., etc. To use the "conditions" to justify the council's proposal smacks of tokenism in order to validate extorting money from people who ironically are often far from wealthy compared to landlords in more affluent areas.</p> <p>By all means deal with the issues concerned; target criminals, antisocial thugs, druggies, litter louts etc. with more intensive policing (I would LOVE to see more cops in the area!), inspection by the council officials and, regarding poor property conditions, set up schemes for landlords to improve their properties within a timeframe. But as I have already said, antisocial behaviour in general is the fault and responsibility of the individuals concerned – not the landlords.</p>

			<p>The council has no doubt fostered a study to observe and audit the shortcomings of others (in response to the conditions provided by 'the law') but perhaps it should look at its own shortcomings; failure to security-gate all the back alleys in the area (including Brompton) and the mean and cynical recent downsizing of household dustbins are just two of many.</p> <p>What is the criteria and justification for selecting the tightly defined zone you have, within such a vast area? Do things suddenly become depraved and criminally antisocial within this strangely shaped area? To be honest, this smacks of a 'pilot scheme' to me which in turn smacks of victimisation and discrimination.</p> <p>Making people pay to be scrutinised is, in my humble view, a travesty of freedom and fairness and to selectively impose a license fee on landlords from the least affluent areas is mean and vindictive.</p> <p>Throughout my life I have voted for each of three main political parties at one time or another and would like to think that I'm open-minded and pragmatic in my outlook but I'm shocked that a Labour-run council would consider behaving in such a blinkered, draconian and bullying manner.</p>
16/02/2017	Resident	Letter	<p>I understand this Selective licensing pilot is about</p> <p>Ensuring rental houses have a positive, not negative, impact on the neighbourhood. Increasing professionalism of the Private Rented Sector. P1 Addressing anti-social behaviour – inc. by landlords and tenants. P1 Ensuring neighbourhoods are places where residents choose to live. P2 Focussing MCC enforcement resources on the worst landlords. P4 <i>And</i> - creating a useful pilot, so you can see whether licensing can be a force for good.</p> <p>I want to make 2 points in support of that:</p> <p>1. The land registry is not a reliable source of information: MCC needs to create one</p> <p>(a) An example: Before buying, we looked at the records for the 6 houses either side of us – i.e. 13 houses: 1 is Housing Association, 3 are distant landlords, and 9 appear as owner-occupier (i.e. the owner gives the house as his/her address). However, in reality 5 of those 9 houses are also let: the landlord lives elsewhere.</p> <p>(b) As a company owner my address is put online publicly. Yet a landlord's address is not. So locals have no means contacting a negligent owner of a neighbouring house. That alone undermines a community.</p> <p>2. This selective licensing pilot area has to include Acomb St. south, and Crofton St. north The main south end of Acomb St., and the north end of Crofton St. are part of this area that is threatened by low quality landlords and anti-social tenants. They meet 5 out of your 6 criteria for selecting an area.</p> <p>Physical environment These streets are under huge pressure from investors wanting to let to students. The traditional mix of home-owners are being priced out of their own homes by landlords who will let the living rooms as</p>

bedrooms, and convert 3-bed houses into 6-bed HMOs. (Evidently it is also in the interest of estate agents to become letting agents for investors, rather than sell to owner occupiers.) In nearby areas, there are few or no long-term residents left. So these remaining streets are vulnerable; they need urgent help.

(a) The main crime faced in these streets is landlord crime. Landlords are routinely converting and building without permission, fly tipping their appliances and building waste, and so degrading the environment and undermining the community.

(b) Acomb & Crofton are beautiful Edwardian streets. They were, and should be, the pride of this area. So they offer the most potential for improving the local environment and sense of pride in the area.

(c) The fronts and front-roofs were restored at huge expense on an EU grant. The public space on the street side is therefore almost unique in being uniformly clean and in good repair.

(d) That is part of what makes them maximally attractive to investor landlords. We see houses being destroyed one-by-one by landlords converting them without planning permission, adding extensions and 3rd floors without permission, knocking out walls and features, filling the gardens with bins, and screwing satellite dishes onto the ornate brickwork.

(e) All of this happens despite this area already coming under MCC's Article 4 Directive. Momentum for change for the area, including Acomb and Crofton, is now coming from MCC Planning Enforcement. They have put in the time and resources to challenge the conversions and extensions, challenge the landlords' false evidence of past use and present occupancy in court, and go on to appeal and win. It is the beginning of a potentially major success and change for this whole area. Of course, Planning Enforcement still have lots more to do, and have the challenge of ensuring compliance. Meanwhile other depts. have to waste resources daily on clearing up the mess created by the landlords.

For example, in 3 outstanding requests for Acomb St, we have waited for months for MCC to solve problems created by absent landlords. Meanwhile, because a landlord's builder's fly tipping makes the whole alley look like a dump, it has filled up with yet more rubbish for MCC to collect.

We are in a context in which landlords know they can get away with anything. They know that at worst, it will take MCC over two years and lots of staff time and money to catch up with them.

Meanwhile they can just keep taking the rent and accruing capital value.

The irony is evident to all: the houses that cost MCC the most, don't even produce any Council Tax. It is we, the good citizens, who pay for MCC to investigate, prosecute and clear up, and then we get fewer services.

Social environment

Most of the landlords would never live in Moss Side, so they don't respect it. Every time I tackle an agent about the mess they have created, they blame the litter and mess on the 'immigrant families'. In reality, the only reason landlords get away with it is because the 'immigrant families' are less confidently vocal. This is an iconic Black British and multicultural area in Britain. It is a great place to live and work. Before we moved here, I struck up street conversations with around 50 people about whether it was safe for my wife to be alone here, and what it would be like to live here. It was 100%

positive.

Yet the main local landlord actually boasts of filling houses with educated students that would otherwise be let to immigrant families (document online at MCC). The character of the area is being deliberately devalued and undermined by landlords with the power and money to do so.

Across the cultural mix, long-term residents who contribute to the community and routinely support others are being replaced by short-term tenants who make none of the local connections, and who just accept or increase a mess, rather than help deal with it.

Many long term residents despair because they see landlords get away with everything, hear about the intimidation, and despair of MCC ever doing anything. They want us to get together to stop it. But it needs *visible enforcement* from MCC, so that local people are not blamed and intimidated.

Together, we won this year's Be Proud Award for Clean City, for engaging new students with help on recycling and information about the area and community. We want to restore the alleys from fly tips, to pleasant communal areas. But right now, the task is dealing with landlord mess.

The urgency of visible enforcement

I am not alone in believing this situation has to end. These streets need commitment from MCC to show everyone that MCC values this area, and values the community and its future. These streets are too vulnerable to wait another 3 years; the momentum is now, and the MCC commitment is needed now. Visible enforcement by MCC is a public investment, not a 'cost'. When landlords finally realise they can no longer get away with it, the illegality, the problems and therefore the costs to MCC will all tumble. Clearly, licensing is not the answer itself; any answer is in what you use the licensing for. But there are good lessons from Newham, and lots of insight and experience from the people who live it here.

Through licensing, MCC could co-ordinate intelligence on landlords, co-ordinate liaison with communities, and coordinate the visible enforcement of existing laws. If you don't license the landlords here, you will continue to have disparate departments spending their resources on different parts of the current mess.

The pilot

Without Acomb S. and Crofton N. the pilot will be weak. The currently proposed area avoids real problems here, while including streets of Housing Association homes (e.g. Roberts Ave. and Playfair St.) that are exempt from licensing, and others of good landlord homes (e.g. Aldwych Ave.) where it's not needed. To exclude Acomb S and Crofton N. will also mean that we spend the next 3 years at loggerheads with MCC.

Local determination to improve things here will inevitably be at odds with your preferred focus on the rest of the area. It will be clear to MCC and locals that if you address the issues in streets outside the pilot area, and/or create positive spin offs for us, you will undermine the pilot and the case for further licensing.

In summary: the current boundary line wrongly divides a small area which shares a particular problem. It makes no sense on the ground. By including Acomb S and Crofton N, the licensing could engage local people and co-ordinate MCC enforcement across this area to build on the progress by

			MCC Planning Enforcement. <i>(At this early stage it would just require a few days added to the consultation. We will help if/where we can.)</i>
21.04.2017	Resident	Letter	<p>Please see the submission for the licensing consultation (below), which, includes our vision for how the scheme should be configured, how it can support our neighbourhoods and existing adopted policies of Manchester City Council.</p> <p><u>PART 1 - Design, Standards, Enforcement and Sustainability of the Scheme</u></p> <p>A] We endorse the requirement to include the following as essential components of the Scheme:</p> <ul style="list-style-type: none"> ▪ GAS SAFETY CERTIFICATE ▪ SAFE CONDITION OF ELECTRICAL APPLIANCES ▪ FITTED & WORKING SMOKE & CARBON MONOXIDE DETECTORS ▪ WRITTEN TENANCY AGREEMENT FOR TENANTS ▪ MAPPING CONTACT DETAILS FOR ALL LANDLORDS AND LETTING AGENTS IN SCHEME AREA ▪ CONTACT DETAILS OF A LOCAL AGENT AND/OR APPOINTEE - (FOR ABSENTEE LANDLORDS) ▪ 'PROPER & FIT PERSON' CRITERIA FOR ALL LANDLORDS IN SCHEME AREA – (BACKGROUND CHECKS, MANAGEMENT STRUCTURES AND FUNDING ARRANGEMENTS) <p>In addition to the above, please see C], D], E] and F] below for other requirements that may benefit our neighbourhoods, residents and MCC.</p> <p>B] Geographical Remit of Licensing Scheme</p> <p>The xx would like the Strategic Housing Team to consider making small alterations to the geographical boundary of the Scheme by removing the neighbourhood encompassing EILEEN GROVE WEST, ALDWYCH AVENUE and THE GRANGE.</p> <p>This is an extremely well managed neighbourhood with properties kept in excellent condition, good waste management regimes in place and low levels of transience – (most of the rental properties are occupied by families that have lived in the neighbourhood for a number of years)</p> <p>We would like you to consider extending the boundary to encompass MAINE ROAD (south of Great Western Street) to take in CYRIL STREET, KIPPAX STREET (and running east along and including) GREAT SOUTHERN STREET. This will also incorporate the top halves of ACOMB STREET and CROFTON STREET, too.</p> <p>The PCRA is aware that this may cause MCC to undertake a fresh round of consultations but it is</p>

important that the Scheme focuses on the most challenging areas

C] Additional Conditions: Individual Bin Areas

Waste mismanagement afflicts neighbourhoods with both individual and communal bin systems. However, our local residents and activists (through specific projects) have shown that it is much easier to institute BEHAVIOUR CHANGE in those neighbourhoods with individual bins because poor waste management practices, fly tipping, over filling bins, 'ghost dumping' and failing to recycle are all much easier to identify. Therefore, those households can be targeted for intervention, support and ultimately prosecution.

In addition to the 'essential' conditions (Part 1 A above), we would like to see additional conditions being considered for private rental properties in individual bin areas: the requirement for private landlords to provide the CORRECT number of waste bins and up-to-date recycling and waste collection information. For example, the landlord and tenant/s can both sign a 'check list' to agree that this has been done.

GOOD PRACTICE suggestion: we would like the selective license to have recommendations to help preserve and maintain the residential ethos of our neighbourhoods, including, storing individual bins in the rear yard of the licensed property

For communal bin areas that are gated, we urge MCC to require landlords to provide keys to open the gates and/or ensure that their tenants are able to access the communal containers via the rear of the property.

D] Costs and Incentives

The PCRA has had an ongoing conversation with some responsible private landlords that let out properties in our area. They have concerns regarding the cost of the proposed landlord licensing scheme and the concern, often, raised with us is, "*we get no benefit from the licensing scheme because we meet and exceed the standards it requires, therefore, the five year license is an unfair tax on us*".

The xx has highlighted these concerns at the formal consultations that were held on the 15th February, 15th March and 13th April.

Additionally, we have spoken with our very able local Councillor Emily Rowles. She has agreed with us that incentivising the responsible landlords in the area is an important component of making this licensing scheme a success. Some ideas that have been mooted for consideration include:

- i]** Access to free or heavily discounted commercial waste disposal - courtesy of MCC;
- ii]** Free tenant checks and references for landlords;
- iii]** Information, advice and mediation service;
- iv]** Allowing landlords to pay for the license via instalments, i.e. five annual payments as opposed to one payment up front;
- v]** Arresting transience - we also urge the Strategic Housing Team to consider making available a discount/reimbursement for any private landlord that manages to retain any of their tenants for the duration of the selective license, (i.e. five years). Providing long term occupation slows the epidemic of transience and 'churn' in our neighbourhoods which has been such a ubiquitous factor in so many of the problems we encounter, for example, waste mismanagement and fly tipping;

vi] Article 4 Direction of the Town and Country Planning (General Permitted Development) Order 1995 - seeks to protect the family housing stock in our general area by requiring landlords to seek planning permission before they use their properties for shared/multiple occupation. Landlords prioritising family accommodation in preference to multiple occupation aid our communities and the adopted policies of MCC, therefore, they should be 'incentivised' through discounts/reimbursements through the selective licensing scheme;

vii] Clear and transparent breakdown of costs for implementing the selective licensing scheme showing how much revenue has been generated from license fees and where its being spent, including, any 'over' and 'under' spends.

E] Bulky Furniture

The xxx has long argued that private landlords have been making a disproportionate contribution to the cost of removing fly tipping from our neighbourhoods. This includes large bulky items of furniture: fridge freezers, carpets, coffee tables, mattresses, sofas, tables and chairs. Therefore, we would appreciate it if some of these items could be indelibly marked, inked or impressed with the address of the licensed property so that it can be identified by neighbours and local authority officers, (in case they are found dumped outside). This measure would make a significant contribution to tackling a major blight affecting our neighbourhoods and could save MCC extensive resources by minimising the cost of removing fly tipping.

F] Failure To Comply with the Requirement to Obtain a License

MCC must highlight its intention to institute criminal prosecutions of any landlord failing to obtain a license for their property - outlining a clear process and relevant periods of time involved. A clear intention must shown to impose the full sanction of a £20,000 fine and retrieve any associated legal/admin costs, too.

PART 2 – Specific Role of Selective Licensing to Support Local Communities as a 'Value Added'

A] Migrant and Asylum Seeker Households

The xx has intervened to help support a number of our residents that are migrants or asylum seekers to the United Kingdom. They often live in smaller (non licensed) HMOs, have extensive language support needs and require the support of the adjoining neighbourhood to help them integrate into the fabric of the community. We have found that some tenants in these households are unaware of the nature of the tenancies that they are party to, for example, a recent case highlighted the fact that a tenant was made 'joint and severally liable' for the rent of his other two house mates when he didn't know either of them prior to moving into the shared household and was never given a choice about the people that he would like to share a house with.

Manchester City Council has struggled to ascertain how much support such challenging households require due to the reciprocal arrangements put in place between the landlord, the Home Office and the tenant. The xxx would like MCC to use the opportunity of this selective licensing scheme to **i]** map the number of such households in the area, **ii]** identify the conditions of these households, including, whether any intervention/support is required and **iii]** work with the voluntary/community organisations to ensure that they're integrated into the life of Manchester and their communities.

B] The Challenges of Transience and 'Hyper' Transience (AirB&B, et al)

Many communities in the proposed Rusholme and Moss Side licensing area suffer,

			<p>disproportionately, from transience. In addition to the loss of community, this phenomenon provides an environment where poor waste management, fly tipping (and casual littering), inconsiderate parking and anti social behaviour is 'normative'. The absence of a responsible residential ethos and civic pride means that communities find it very difficult to resist those behaviours and practices that end up blighting our neighbourhoods. In an environment like this, the rise of social media enterprises like AirB&B present a very specific threat to vulnerable communities like ours and we feel that the advent of a licensing scheme provides an opportunity to put in place measures that could help monitor the occupation patterns in some of our shared private households. We would like MCC to consider the following:</p> <ul style="list-style-type: none"> i] undertake inspections of licensable properties during the summer (or in between university term times) when some private landlords will be tempted to advertise accommodation on AirB&B ii] if possible, monitor how properties are being advertised – (both online, by letting agents and in community settings like shops and newsagents) iii] work with the local waste collection teams to 'flag up' sudden increases in side waste, (one indicator of unauthorised occupation of local properties); we're aware that this exercise is more effective with individual (as opposed to communal) bin areas <p>C] Empty Homes The initial mapping exercise of the licensing area will also reveal some properties that have remained unoccupied for a considerable period of time. These properties are being left to decay, which, presents specific problems for the local communities in which they're located and undermines other key policy objectives of MCC to ensure the availability of housing for a growing population. The data obtained could then be passed onto the MCC's Empty Homes Team for follow up action.</p> <p>D] Tackling The Proliferation of Letting Agent Signs The PCRA are aware of specific planning measures to control the use of letting agent signs at the front of properties, but, we feel that mapping our neighbourhoods in preparation for a proposed selective licensing scheme provides us with an opportunity to compile a list of private rental properties that <u>MUST</u> be referred for immediate planning enforcement action. This will be a good way for MCC to demonstrate 'joined up thinking' by enhancing the effectiveness of existing policies and enforcement regimes.</p> <p>E] Overgrown Hedges & Dangerous Buddleia An effective inspection regime must impress upon landlords to cut and maintain their hedges to a reasonable standard and to deal with any shrubs or plants that are likely to damage the fabric of the property. The PCRA have come across regular examples of private rental properties that have large buddleia shrubs growing through yard walls and threatening to collapse it. As with letting agent signs, existing measures to tackle these issues will be enhanced by effective licensing inspections that flag up issues for enforcement action.</p>
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In addition to the above representations the following common queries were noted at the consultation drop-in events:

15.02.2017 – Trinity House, Grove Close, Manchester

- Resident wishes to go travelling and let property out for 12 months only to fund trip, will they have to pay for a licence?
- A Trust manages two asylum seeker properties in the area and queried are they exempt, if not who applies, the Trust or Owner?
- Would MCC consider phased payments for landlords with many properties
- There used to be a landlord forum in the town hall can this be re-introduced?
- Properties should be inspected by MCC before they are let out by landlords
- Can the area be extended (popular requests for all of Acomb St and Crofton St) - conditions are worse near the Curry Mile, and top of Fallowfield where students are.
- Remove Thornton, Brompton and Horton streets as they are the nicest in the area
- Landlords feel like they are border control (Right to Rent)
- Will licensing mean the visual appearance of the area is improved, in particular issues with litter, fly-tipping, communal containers (alley-way) and street cleansing?
- Builders often fly tip in the area
- Lots of people queried why this areas has been chosen when the immediate neighbouring areas (Walmer St, Acomb St, Crofton, top of Fallowfield, Curry Mile area) are considered to be in worse condition. Top end of proposed area is primarily social housing.
- Residents and landlords both agree that the council's decision to place communal bins for residents to use in none gated alleyways has added to the problem. They believe it should have been individual bins for households in none gated properties and communal bins in gated properties. So they didn't believe SL would tackle the issue of rubbish in the area.

15.03.2017 – Millennium Powerhouse, Raby St, Manchester

- Council needs to support landlords and take action against empty properties
- Rents will increase
- Licensing should be extended to near shops on Wilmslow Rd
- Who should apply for the licence – managing agent or landlord
- Difficult getting references for students sometimes as its their first property
- Queries around proposals for extended mandatory HMO licensing (2 storey)
- Builders always dumping rubbish in the area
- Queries around cost of licence
- Scheme will need to be effectively resourced to take enforcement action to work
- Area does not meet conditions for Selective Licensing – Hayden St and Ruskin Ave
- Right To Rent – unclear what documents are sufficient as residential permits are sometimes time limited, majority of landlords don't know about this requirement.
- Older landlords may not maintain properties as the investment is their pension
- Regular updates to landlords about legislative changes and updates would be useful
- Will licensing address street cleansing and litter in area. Environmental quality of the area determines resident's health and sustainability of the area.

13.04.2017 – Birch Community Centre, Brighton Grove, Manchester

- Will impact investors and letting properties in the area
- Other legislation exists which has had an impact on landlords e.g. stamp duty for second homes, tax on mortgage interest, tenancy deposit scheme
- Additional cost and regulations
- Area doesn't suffer with the issues that have been the driving force for Selective Licensing
- There is a real sense of community in the area
- Rogue landlords only should be targeted
- Residents agreed issues in the area are with waste management, transiency, poorly managed rented houses and poor housing conditions

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