

East Devon District Council Private Sector Housing Renewal Plan 2012-15

'Better housing, better health'

Introduction

Our Private Sector Housing Renewal Strategy 2012-2015 sets out the actions that we and our partners will take to meet the housing objectives set out in our Homes and Communities Plan. It addresses the need for housing renewal (maintaining, improving or adapting homes) in East Devon, and explains how we intend to meet this need. Our overarching purpose is 'better housing – better health' to be achieved through advice, assistance and enforcement.

Background

Our Private Sector Housing team is responsible for investigating, maintaining, enforcing and improving housing standards and conditions in the private housing sector. This sector includes private rented, owner occupied and Housing Association accommodation. In 2010 responsibility for private sector housing in East Devon District Council moved from the Environmental Health Service to the Housing Service.

This Strategy builds upon two major documents, the East Devon Council Plan 2012 - 2016 and the Homes and Communities Plan 2012-2015. Together these set out the Council's overarching aims for private sector housing renewal for the next 3 years. This document builds upon, and replaces our previous private sector housing strategies.

The overarching aim of the Homes and Communities Plan is to ensure a decent home for all that is affordable, adequate in size and suitably located. It takes into account national and local policies and evidence to set ten key aims to meet the housing needs of people in East Devon. These are aims for housing as a whole within the district including Council owned housing, other social housing and housing in the private sector.

Five of the ten aims in the Homes and Communities Plan are particularly relevant to housing in the private sector:

- Aim 4 - Bring sub-standard housing (of all tenures) up to current standards
- Aim 5 - Improve the use and safety of housing
- Aim 6 - Enable elderly persons, disabled people and people with special needs to live as independently as possible and remain in their own homes if they so wish
- Aim 7 - Improve the sustainability and energy efficiency of housing and eliminate fuel poverty

- Aim 10 - Have consistently satisfied customers.

Policy Context

The Homes and Communities Plan reviews the relevant national and local policies that particularly affect the provision of housing within the district.

Since our previous Private Sector Housing Renewal strategy in 2008, there has been a change of Government, bringing with it radical change in tone and direction in national housing policies, with particular emphasis on revitalising the housing market and other priorities include tackling long term empty homes and renewed focus on energy efficiency. The Private Sector Housing Renewal Fund has been removed. The Disabled Facilities Grant remains but it will no longer be ring fenced and the amount of money available will be determined at a local level, along with other priorities for capital allocations. The changes introduced by the Housing Act 2004 and the Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gives local housing authorities wide ranging powers to provide assistance for housing renewal and it is a requirement that these are formally adopted and published. These are still the main statutory provisions covering local authority work in private sector housing and we will continue to use these provisions to improve private sector housing in East Devon.

Government guidance stresses that those who own homes are responsible for their repair and improvements. However, both the former and the present Governments view the equity in many private sector homes as a potential source of finance for improving the conditions in this area. The numbers of local authorities who still give financial assistance solely through grants is decreasing all the time. Many are using government backed specialist providers and offer a range of low cost schemes tailored to the needs of vulnerable households. We provide low cost, subsidised loans through Wessex Home Loans for vulnerable, elderly homeowners to maintain and repair their homes.

The Government's Housing Strategy (ref) makes it clear that bringing empty homes back into use is a major priority, and is offering financial incentives to local authorities via the New Homes Bonus. This funding is not currently supporting private sector housing work but could, if agreed, partially fund additional resources to tackle empty homes. Presently we have a partnership agreement with Exeter City Council who provides a part time Empty Homes Officer.

The 'Green Deal' is the government's major initiative aimed at improving energy efficiency in properties in the UK. The Government sees local authorities as having a significant role in this area, either as direct providers of co-ordinated finance and delivery, working in partnership with commercial Green Deal providers and community partners, or acting as advocates to promote the Green Deal.

The Government is also keen to promote social well being and it will be important for local authorities to work with local health providers to ensure that housing conditions are taken into consideration with regard to improving people's health and wellbeing.

Evidence Base/Housing in East Devon – Key facts and figures

As stated in our Homes and Communities Plan the main housing issues and challenges are:

1. A need for more affordable housing (demand far exceeds supply)
2. The high cost of owner occupation and renting in the private sector affecting the ability to secure suitable housing
3. Low wages in the district as compared to the national average
4. Poor housing conditions in the private sector
5. Fuel poverty and affordable warmth
6. The lack of suitable housing for young people.

These affect all types of tenure and ownership.

The population within East Devon is estimated to be 136,600 and the number of households is estimated to be 61,300. East Devon's population is projected to rise to 156,700 by 2026. Correspondingly the number of households is predicted to rise to 73,600 by 2026¹.

Compared to the national average (NA):

1. Significantly lower numbers of social rented properties are available (EDDC 10%, NA 18%)²
2. A significantly higher proportion of households are over 65 years of age (EDDC 44%, NA 25%)
3. A significantly higher proportion of households are receiving benefits (EDDC 22%, NA 17%)
4. Average income levels are lower (for 2010, EDDC £18,595, England £21,398)³
5. Average house prices are higher (for 2010, EDDC £266,470, NA £240,033)
6. More households in the private rented sector suffer from fuel poverty (EDDC 18.8%, NA 15.6%)⁴
7. More properties in the private rented sector are in a non decent condition (EDDC 40.8%, NA 33.2%)

The Exeter and Torbay Strategic Housing Markets Assessment 2007, updated for East Devon in 2011, gives a detailed picture of housing conditions in the district.

Analysis of the overall tenure of housing stock in the East Devon district shows that 79% of properties are owned outright or with a mortgage, 12% are rented from social landlords (three quarters of which are owned by the Council) and 9% are in the private rented sector.

¹ Office of National Statistics 2008 based sub-national population projections & Communities and Local Government Household Projections Model (2008-based) as quoted in East Devon Housing and Employment Study, 2011, Roger Tym & Partners

² Private Sector House Condition Survey 2010 December 2010 by CPC for EDDC

³ National Housing Federation South West: Home Truths 2010

⁴ Private Sector House Condition Survey 2010 December 2010 by CPC for EDDC

A total of 1046 households are currently living in technically overcrowded housing – though 505 of these households (48%) consider their home to be about the right size.

As many as 45700 (81%) technically under-occupy their property – over half of these by a factor of two bedrooms or more.

There is a tendency for more houses in rural areas to be in a poor physical condition and have problems with energy efficiency because of the typical building ages and construction types.

A total of 9% of households reported that there was at least one serious problem with their property with the most common problems being roof repairs, damp penetration or condensation and window repairs with all of these being prevalent in the Honiton area.

Overall 16,100 of properties in the private sector failed the Decent Homes standard and of that number 10,000 failed due to a Category 1 hazard. The Housing Act 2004 introduced the Housing Health and Safety Rating system (HHSRS) to assess the housing conditions and evaluate the potential risks to health and safety in properties. The HHSRS defines 29 hazards. If the risk of a hazard is assessed to be high, it is considered to be 'Category 1' and the council has a duty to take action. Such hazards are strongly associated with older dwellings (pre 1945) and dwellings occupied by households on a low income, in receipt of a benefit, heads of households aged 65 and over and residents with a disability.

The highest number of Category 1 failures is due to thermal comfort. This links to the fact that many properties in the district are old and lack sufficient insulation (loft and cavity wall) and suitable heating. Properties can therefore be cold and expensive to heat. With the aging profile of the district, older people are less likely to be able to repair and maintain their homes and afford adequate heating. They may have to choose between eating or heating, so become cold, and are more likely to fall.

Improving energy efficiency of properties is also important as this can reduce carbon emissions, help to reduce fuel poverty, remove Category 1 hazards, improve health and well being and provide warmer homes. However improving this alone is not sufficient as disrepair in the older private sector housing stock is a significant issue.

Houses in Multiple Occupation (HMO) are a specific type of housing whereby more than one household lives in a property and may or may not share access or facilities. Some HMO's must be licensed because they are over three storeys in height and are occupied by five or more households who share facilities. Many HMO's are called bedsit accommodation or long term bed and breakfast establishments, or partial flat conversions. The main issue with these types of accommodation is the lack of fire safety. Often the households who live in these properties have cooking facilities in their own rooms, which increases the likelihood of a fire starting.

We have thirty licensed HMO's in East Devon which have been licensed for five years. We have set up a programme of re-licensing these thirty properties and ensuring that any works that were required by the previous conditions have been carried out, or if not, then statutory notices are being issued prior to licensing again.

We are aware that there are many other HMOs in East Devon that should be licensed but many landlords are failing to apply. This is a part of our work that requires a proactive approach and ensuring that staffing resources are available.

We also have significant numbers of smaller HMO's which do not require licensing but are lacking in adequate facilities for fire safety and heating. At present these are being identified through service requests from tenants.

Long term empty homes. We have identified that long term empty homes, homes which have been left empty for more than six months, are a specific issue in East Devon. Our Empty Homes Strategy 2009 – 2014 sets out an action plan for dealing with empty homes. The delivery of the action plan is carried out via a Service Level Agreement with Exeter City Council who provide a part time (2 days a week) Empty Homes Officer. The past twelve months has seen three very long term empty homes in East Devon being sold and redeveloped.

Mobile homes. We have approximately 60 mobile home sites within East Devon which cater for permanent residents and holiday makers. All of these sites are licensed and require, at present an annual inspection. Risk based assessments are being carried out to identify those sites with the lowest risks due to good management and site/amenity provisions so that we are able to consider longer timescales between license inspections.

Advice, Education and Encouragement

We provide advice with respect to existing government and local initiatives in addition to any other relevant avenues to improve housing standards for example energy efficiency schemes. It is directed not only at improving housing standards, but also at ways to increase housing provision, e.g. Empty Homes work.

The prime responsibility for the condition of houses in the private sector rests with the owners of individual properties, whether owner-occupiers or landlords. Local authority officers try, except where there is an imminent risk to health and safety or where the law requires otherwise, to deal with problems concerning property condition by informal action. This can be education, awareness raising, informal advice, signposting or encouragement. Targeted marketing/education campaigns take place to promote specific initiatives - for example Cosy Devon. This project is supported and facilitated by EDDC as one of 10 partners across Devon.

Both Local Authority officers and staff of the Home Improvement Agency provide informal education and advice. In practice, this largely centres on contacts with grant applicants (giving advice where financial aid cannot be given) and with landlords where informal action is being taken to deal with unsatisfactory conditions. Landlord forums provide a useful platform to provide advice and information. We assist in the facilitation of such forums with the National Landlords Association and Smartmove.

The Authority is increasingly focusing activity to promote, facilitate and explore partnerships to improve or repair private sector housing without financial commitment.

Structured provision for advice and guidance is made regarding empty homes. The Authority has entered into a partnership arrangement with Exeter City Council. The partnership officer identifies empty properties and advises owners on the various means to bring them back into use.

We will also be looking to build on partnerships in the voluntary sector e.g. local charities, Citizens Advice Bureau, as a means of disseminating housing advice etc.

Key Challenges

The Homes and Communities Plan sets out the key challenges for housing in the district as a whole.

Specific challenges for private sector housing include:

- Addressing issues of disrepair and fuel poverty within the sector
- Improving conditions within Houses of Multiple Occupation
- Bringing empty homes back into use
- Continuing to deliver Disabled Facilities Grants in order to provide suitable adaptations so allowing elderly and disabled people to remain at home
- Delivering a fast track process for stair lifts, hoists and lifts
- Providing subsidised loan assistance to elderly, vulnerable and disabled owner occupiers to enable them to maintain their homes in a weather proof and safe condition
- Ensuring that mobile home sites are regularly inspected and full risk assessments carried out
- The provision of reasonable and suitable gypsy and traveller sites
- The regulation of private water supplies

Consultation

The draft revised Private Sector Housing Renewal Strategy has been sent out to consultation to our partners, agencies and comments received have been collated and revisions made.

Objectives

Homes and Communities Plan Aim 4: Bring sub-standard housing (of all tenures) up to current standards.

The Council has both the duty and a number of powers, to ensure the private housing stock is safe and fit for purpose.

- **Reviewing housing conditions in the district**

The Housing Act 2004 places a duty on local authorities to keep housing conditions in their area under review and inspect premises where they suspect the existence of a hazard. A stock condition survey of East Devon was completed in December 2010. This indicated that the primary hazard failures in East Devon are excess cold, damp and mould and risk of falling, caused by uneven surfaces.

Action	Respond to the recommendations in the stock condition survey.
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Intended outcome Primary hazards are reduced.

- **Provide the opportunity for everyone to live in a decent home**

It is government policy that everyone should have the opportunity to live in a 'decent home'. The Decent Homes Standard (DHS) comprises four broad criteria: hazards, disrepair, modern facilities and thermal comfort. 28.3% of homes in East Devon do not meet the DHS, compared with 36% nationally. Most failures relate to thermal comfort and insufficient energy efficiency levels. In common with the national picture, private rented homes are generally in the poorest condition. The stock condition survey indicates that there are 39.5% of vulnerable households, who are in receipt of one of the principal means-tested benefits or long-term disability benefits, living in non-decent dwellings in East Devon and the report recommends that resources should be targeted at this group.

Action Target assistance to vulnerable and low income households.

Intended outcome Maximise the use of Wessex Low Cost Loan products to improve owner occupied properties occupied by elderly, vulnerable and low income.

- **Assess hazards in the private sector stock**

The Housing Act 2004 introduced the Housing Health and Safety Rating System (HHSRS) to assess the housing conditions and evaluate the potential risks to health and safety in properties. The HHSRS defines 29 hazards. If the risk of a hazard is assessed to be high, it is considered to be 'Category 1' and the Council has a duty to take action. Such hazards are strongly associated with older dwellings (pre 1945) and dwellings occupied by households on a low income, in receipt of a benefit, heads of households aged 65 and over and residents with a disability.

The stock condition survey indicates that 28.3% of all properties in East Devon have Category 1 hazards under the HHSRS, representing 15.9% of owner occupier properties and 29.5% of private rented properties. 81.1% of failures related to excess cold, 14.9% related to falls on the level and 13% related to falls on stairs. 12% of dwellings with a Category 1 hazard had two or more failures. The Council is focussing on energy efficiency to tackle the lack of thermal comfort, as set out under Aim 6, and will seek to work with the voluntary and health sectors regarding health impacts of excess cold, damp and mould and falls prevention.

Action Prioritise cases where Category 1 hazards are identified.

Intended Outcome Those at the greatest risk are addressed quickly providing better health.

- **Provide low cost Loans**

East Devon currently offers low cost loans to deliver assistance to home owners whose capital is tied up in the value of their property. Loans of between £1,000 and £15,000 are available, repayable over an agreed period of up to 15 years. The delivery of these loans is via Wessex Homes Loans. In 2011/12 7 loans were offered to residents in East Devon and the Council aims to increase the number of loans offered in the next three years.

Action Encourage greater take up of loans to fund repairs.

Intended Outcome Improved and better maintained homes.

- **Caravan Sites**

East Devon has 60 residential caravan/mobile home sites. Each site is inspected annually to ensure that it meets the licensing conditions. Most recently risk assessments have been carried out to provide a more focussed and manageable inspection regime. Where sites are well managed and in good condition these sites will be monitored on a 3 yearly basis. Where sites are not managed well these will remain on an annual inspection and enforcement opportunities will be identified to bring them up to the minimum required standards. New guidance and regulations are to be provided in 2013 to allow local authorities to set up charges to carry out licensing inspections of caravan/mobile home sites.

Action Monitor through inspection all residential caravan/mobile home sites to ensure compliance with licensing conditions and regulations.

Intended outcome To ensure good standards of accommodation in caravans and mobile homes.

Homes and Communities Plan Aim 5: Improve the use and safety of housing

As there are many pressures on both private sector and Council housing it is imperative that we make the best use of the housing stock that is available. This might mean addressing safety issues within houses to ensure that families can stay in their homes.

- **Implement the Empty Homes Strategy and revise the Action Plan**

Homes that stand empty are a wasted resource and have a detrimental effect on neighbourhoods. The government has allocated £100m to boost housing supply by bringing empty properties back into use. In addition, a financial incentive payment, called New Homes Bonus has been introduced and is payable to local authorities for each new build property and each long term empty property brought back into use every year. Nationally there are 762,000 empty homes; in East Devon there are approximately 500 empty properties that have been empty for more than six months.

East Devon has a partnership arrangement with Exeter City Council who provide a part time Empty Homes Officer. Her objective is to reduce the number of long term empty properties in East Devon, providing advice and support to empty property owners to help them bring them back into use. East Devon also has procedures for using the enforcement tools.

Actions Promote new and innovative schemes to assist owners of empty homes to bring them back into use.

Work with Council Tax and Parish and Town Council's to identify and assist in bringing empty homes back into use.

Bring at least 10 long term empty properties back into use annually.

Intended Outcome Increase housing supply by bringing long term empty properties back into use.

- **Private Water Supplies**

East Devon has around 1800 private water supplies, of which approximately 500 require risk assessments and monitoring programmes set up to ensure that the water is safe and of good quality. This public health duty is a priority for the Council and we have a programme of risk assessments to complete by 2014, which operates alongside a water sampling contract.

Actions Implement a Risk Assessment and monitoring programme to comply with the Private Water Supply Regulations 2009

Intended Outcome Provision of safe private water supplies for commercial and domestic use

Homes and Communities Plan Aim 6: Enable elderly persons, disabled people, and people with special needs to live as independently as possible and remain in their own homes if they so wish.

We are committed to supporting and enabling people to stay in their homes, if they so wish, by direct service provision and working with other agencies. In many cases homes are suitable but residents need care or support.

- **Provide Disabled Facilities Grants (DFGs) to people who need adaptations**

DFGs are mandatory grants payable to older or disabled people (including children) who need adaptations to their homes. With an ageing population and greater life expectancy of children with disabilities, the demand for DFGs is expected to rise. The house condition survey identified potential

demand to be £12.7 million, which will be a challenge to meet with limited resources. The budget for 2011/12 is £512,000 and is expected to deliver 90 completed grants/adaptations.

EDDC is working on a number of initiatives to reduce the cost of DFGs for stair lifts, through floor lifts and level access showers. These include procurement with other authorities in Devon to bulk purchase both equipment and contractors and help grant applicants to consider alternative housing options that may be more appropriate to meet their needs.

Action Complete the procurement processes for stair lifts/through floor lifts and level access showers by the end of 2013.

Intended outcome Provide DFG grant applicants the opportunity to secure lower cost adaptations.

Homes and Communities Plan Aim 7: Improve the sustainability and energy efficiency of housing and eliminate fuel poverty

We are committed to the principles of sustainability in all of our activities. We aim to meet the diverse needs of existing and future residents in ways that make effective use of natural resources, enhance the environment, promote social cohesion and inclusion and strengthen economic prosperity. By 2020, Government has a target to decrease carbon emissions by 18% on 2008 levels; carbon emissions from homes will need to be cut by 29% on 2008 levels to contribute to this target⁵. East Devon must ensure that we are contributing to this target; however, the rising cost of fuel is also a driver for improving the sustainability and energy efficiency of housing in the district. Fuel poverty occurs when a household has to spend more than 10% of its income on heating and hot water. Overall, fuel poverty in East Devon is 12.3% (down from 13.2% in 2009), with the rate in the private rented sector being 18.8%⁶.

In July 2012 the government issued new guidance to help local authorities in England improve the energy efficiency of their residential housing. The guidance, issued under the Home Energy Conservation Act (HECA) 1995, requires local authorities to publish a report on their plans to achieve improved energy efficiency by March 31st 2013. Local authorities will be required to identify practicable and cost-effective measures likely to result in significant energy reduction in all residential accommodation in their area. The Government is committed to local authorities setting their own priorities, ambitions and any related targets as they are best placed to assess their local needs and judge what will achieve significant improvements based on their particular local circumstances.

- **Affordable Warmth**

Affordable Warmth is the ability to heat your home adequately for household comfort and heat without getting into fuel debt as a result. It is the solution to fuel poverty, through

⁵ Low Carbon Transition Plan, 2009, HM Government

⁶ Private Sector Housing Condition Survey December 2010, CPC

better heating, insulation and increasing benefit uptake, by vulnerable families and individuals.

Fuel Poverty is an inability to afford to adequately heat a home. It occurs when people need to spend more than 10% of disposable income on fuel to achieve adequate levels of warmth in their home. It is due to a combination of factors, which typically comprise of a low household income, poor insulation standards and an inefficient or expensive heating system.

Action Working in partnership with all other Devon authorities to continue to refresh the Devon-wide Affordable Warmth Strategy, which was started in 2010⁷, and links directly to EDDC's Affordable Warmth Strategy. Refresh the EDDC Affordable Warmth Strategy once the Devon wide Affordable Warmth Strategy is complete.

Intended outcome Improved energy efficiency of the housing stock and reduced fuel poverty.

- **Improve the energy efficiency of private stock and reduce fuel poverty**

To date Cosy Devon has provided energy efficiency measures to over 800 households in East Devon. To date we have provided 60 small grants to private landlords to install heating systems, and insulation measures.

Action Continue to assist private landlords with improving energy efficiency and heating measures in private rented properties. In partnership with other agencies and local Housing Authorities in Devon seek to progress a wide range of energy saving measures to assist in raising the energy efficiency of the private sector housing stock and reduce fuel poverty.

Intended out come To improve energy efficiency and reduce fuel poverty across the area.

- **Green Deal and ECO**

The Green Deal is the coalition government's scheme to improve energy efficiency of all properties with 'no upfront costs' and recouping payments through a charge, via instalments, on the energy bill of the property improved.

ECO or the new Energy Company Obligation will focus energy companies on improving the ability of the vulnerable and those on lower incomes to heat their homes affordably, and improve the energy efficiency of hard to treat, like solid walled, properties which have not previously been eligible for measures under energy company obligations.

⁷ Affordable Warmth Strategy

Actions	<p>Work closely with energy providers and installers to consider the best way of assisting the implementation of the Governments new 'Green Deal' initiatives and ECO.</p> <p>Continue to operate and promote the Cosy Devon scheme until the Green Deal and ECO start.</p> <p>Work in partnership with other Devon Authorities to implement the Green Deal across East Devon within the private rented and Owner Occupied stock.</p>
Intended outcome	To improve the thermal efficiency of homes in the district, targeting hard to treat properties in rural areas in particular.

Homes and Communities Plan Aim 10: Have consistently satisfied customers

We are continually aiming to improve customer satisfaction, which can be used as a measure of how effectively and efficiently we are working. 'Systems Thinking' is the process of understanding how things influence one another within a whole system of work and changing the system to do what matters to customers and eliminate wasteful processes.

Better Homes – better health is our clear statement of purpose that drives our service delivery.

Action	<p>Use the 'Systems Thinking' approach to improve our services to customers and deliver service efficiencies and improvements. Ensure that we do 'what matters' for customers.</p> <p>Undertake benchmarking with other providers and import good practice from elsewhere.</p>
Intended outcome	Improve our service and delivery, ensuring that we do 'what matters' for our customers.

Conclusion

The Private Sector Housing Strategy is an important part of the overall Homes & Communities Plan 2012 – 2015. With significant pressure on resources and increases in the number of older people in East Devon in the future, the Council needs to set out how it will meet the needs of all residents and measure how it will achieve positive outcomes. The actions identified in the Private Sector Housing Strategy are explained in greater detail in the Delivery Action Plan appendix 1. We have set ambitious range of actions with the overall aim of facilitating better housing – better health.

Monitoring and Review

In order to ensure that this Strategy and the Delivery Action plan meet the key aims and actions it will be reviewed and monitored regularly.

The Delivery Action plan will use the SMART principles and be monitored on a quarterly basis by the Private Sector Housing team and half yearly reports will be submitted to the Portfolio Holder for Homes and Communities and an annual report will be presented to Cabinet.

Appendices

- 1. Delivery Action plan**
- 2. Enforcement policy (Cabinet Oct 2011 Enforcement Charging Report)**
- 3. Financial Assistance eligibility and conditions**
- 4. HHSRS details**