

Private Sector Housing Delivery Plan



Private Sector Housing Delivery Plan 2013 - 2015

Foreword

Welcome to the Private Sector Housing Delivery Plan – it is one of the detailed plans helping us to implement our main Housing Strategy.

The plan mainly relates to private sector housing, (privately rented or owner occupier), which accounts for approximately 90% of the homes in North Somerset.

It is important to remember that this plan focuses on the well-being of occupants as well as improving housing conditions and so it includes a range of services to deliver decent homes that contribute to a sustainable community. The plan provides an appropriate and practical response to the findings of our stock condition survey carried out last year.

We will focus our resources and work in partnership with private landlords, home owners and other statutory and non-statutory sectors, to help those people in poor housing to have the opportunity to live in a home they can be proud of.

This plan is not just about meeting Government standards but also improving people's quality of life and is set against the funding challenges we face.

I hope the publication of this plan will demonstrate our resolve to meet the aspirations of all our residents.

Cllr Elfan ap Rees

Deputy Leader and Executive Member for Strategic Planning, Highways,
Economic Development and Housing

The Purpose of the Delivery Plan

The Council is committed to improving housing conditions across all tenures. This Delivery Plan sits under the Housing Strategy 2010 to 2015, which lays out the Council's overall vision for Housing of;

“Maintaining and developing successful communities where people want to live, by meeting the housing needs of our residents now and in the future”.

This Delivery Plan aims to identify the important issues facing the private housing sector and sets out the priorities for action, the policy tools and the resources available.

To achieve this the Housing Strategy identifies 3 priorities;

- Delivering Homes, Developing Communities
- Better Homes, Better Places
- Greater Opportunity, Greater Choice

In delivering the priority of Better Homes, Better Places, the Housing Strategy, and this Delivery Plan, focus on the following priorities;

- Improving housing quality across all sectors
- Improving conditions for Park Home residents
- Promoting energy efficiency and reducing fuel poverty

The Plan also aims to reflect policies and priorities at a national, regional and local level. It sits under the broader Housing Strategy, 2010 to 2015, and the corporate Plan and links to a number of other delivery plans.

Consultation

Prior to the publication of this delivery plan, the draft copy was made available for consultation. All internal and external partners, including all parish councils, community groups and charitable organisations and all those consulted as part of the broader Housing Strategy were invited to comment. The Draft Plan was also open to public consultation via e-consult for a 6 week period. All responses were taken into consideration in the final version and a summary of responses is included in the appendix 2.

The draft document was presented to the ASSH panel on 5th February 2013, as recorded in the ASSH panel minutes.

Background

North Somerset covers an area of 144 square miles in the South West of England. It is a diverse area, stretching from the coast and Bristol Channel to the west, the River Avon and the boundaries of Bristol City Council to the north and east and to the Mendip hills to the south and includes both rural and urban environments. Over 2/3rds of the population live in urban areas, in the 4 towns of Clevedon, Nailsea, Portishead and Weston super Mare, with the remaining 33% living in the villages and countryside.

Housing Conditions

In 2011 a Private Sector Housing Stock condition survey was carried out across the district. This was a joint project with the other West of England (WOE) authorities and gave data for North Somerset as well as the whole WOE region. The summary report also compared the local results with the national data obtained through the English House Condition Survey (EHCS).

The survey findings have formed an evidence base to develop our priorities and actions for this Delivery Plan. There are a number of challenges facing the private housing sector including welfare benefit reforms, an aging population, energy costs . These are also considered in this plan and have also influenced how we have developed our priorities and actions.

The key findings from the survey were:

Housing profile and conditions

- The survey gives us a clear picture of housing tenure in North Somerset - 72.7% is owner occupied, 17.7% is private rented and 9.6% is social rented (RPs)
- A higher proportion of dwellings are rented privately in North Somerset than in the average English Local Authority and this tenure has expanded extremely rapidly in North Somerset over the past ten years, roughly doubling over the period.
- There are a greater proportion of modern dwellings in North Somerset than the national average, with more converted flats and more Houses in Multiple Occupation.
- Whilst the proportion of dwellings overall in poor condition (non decent) is better than the national average the condition of dwellings in North Somerset does not follow the national pattern in that the rate of non-decency in private rented homes is significantly higher than the national average. By contrast, the owner occupied sector is in significantly better condition than in the UK as a whole.

- Dwellings in poor condition are primarily concentrated in the coastal wards of Weston-super-Mare, but with small concentrations of non decent housing in Clevedon.
- The biggest causes of poor quality housing (category 1 hazards) are excess cold due to poor insulation and inefficient heating systems, falls on stairs and trip hazards.
- The energy performance rating of the whole stock has improved significantly since 2007 and the SAP rating (measure of the energy efficiency of the house) is above the national average. However fuel poverty is worst in private rented sector dwellings and the highest concentrations of fuel poverty are found in the coastal wards of Weston-Super-Mare

In comparison with previous findings on housing conditions in North Somerset, significant improvements have been made: Since 2005 the level of non decency has gone down from 37.7% to 29.5% and the number of vulnerable households living in decent accommodation has gone up from 58.3% to 68.6 %.

The survey also looked at social and economic factors. Key findings were;

- The average household income was found to be slightly lower than in England as a whole with a large proportion (26%) in receipt of one or more benefit.
- The proportion of households in North Somerset with a resident over 65 years of age was 33% which compares to a national figure of 13%.
- Residents in the private rented sector were on average younger and in the owner occupied sector older, than is the case nationally. Single person households were also more common
- There are a slightly above average proportion of residents with some form of disability.
- Average house prices are slightly below the average value across the UK. In 2006/7 it was estimated that only 9% of new housing provision in North Somerset was affordable. Since this time the fall in house prices has led to the amount of housing that is affordable in North Somerset increasing by about 10%, however this has been offset by the decrease in the availability of mortgage finance. It is estimated that by 2016 affordability will have decreased back to the 2006 levels.

North Somerset has some very affluent communities but also has some of the most deprived, with two wards in Weston super Mare being in the top 1% most deprived nationally.

Many older residents in the owner occupied sector were found to own their homes (capital rich) but be reliant on benefits for income (income poor). This, combined with the aging population profile indicates that demand for Disabled Facilities Grants is likely to increase. This is reflected in the survey finding that an

above average proportion of residents reported to have a disability, with 17% of all household having at least one resident with a long term illness or disability.

As set out above the highest levels of non-decency are in homes located in the three coastal wards in WSM with some pockets of non-decent housing in Clevedon. These are the areas with the highest proportion of private rented properties, occupied predominantly by young people on low incomes.

There is a direct and well documented link between poor housing conditions and poor health. Problems of excess cold, damp and mould are often associated with ill health, such as high blood pressure or circulatory problems in the elderly, and raised levels of asthma in children. Poor design and layout, as well as issues of disrepair can lead to problems with falls, causing significant health issues to the elderly and disabled.

Welfare reform challenges

From April 2011 there have been significant changes to the Local Housing Allowance (LHA) from which the amount of housing benefit a person is eligible to receive is calculated.

Rates were reduced from the mid point of average rents for a particular area and property size to the 30% point in the range of rents charged. This change has applied to all new claims made after April 2011, with a nine month transition period for existing claims.

Other changes include;

- Allowing single people to claim LHA for non self-contained accommodation only up to the age of 35, rather than the previous age limit of 25 years,
- Significantly increasing the deductions made from the LHA for those tenants who have adult non-dependants living with them.
- From April 2013 anyone living in social housing who is assessed as having an extra bedroom will have their housing benefit reduced by 14% if they have 1 room extra or 25% if they have 2 or more extra rooms.
- Also from the summer 2013 a cap will be placed on the total amount of benefit most people aged 16 to 64 can receive.

These reforms are likely to increase the demand in the private rented sector, especially for affordable accommodation in smaller units, including bedsits and single rooms in shared houses

Private Rented Sector

Introduction

The private rented sector is a vital part of the housing market in North Somerset, and represents 17.7% of the stock, being the sector that has expanded the most rapidly over the last 10 years. Much of this increase has been fuelled by the provision of “Buy to Let” mortgages that became available in the late 1990s and is further fuelled by the high cost of housing. For these reasons it is a sector of the housing stock that is likely to continue to expand.

There are an estimated 1500 houses in multiple occupation (HMO's) across North Somerset with a concentration in Weston super Mare. It is important to ensure that these homes are well managed and meet the minimum standards set out in the Housing Act 2004.

The Government through the Localism Act have enabled Local Authorities to discharge their homelessness duties through the use of private rented housing which will further increase the role of the private rented sector in preventing and resolving homelessness. This combined with the welfare reform changes will put a considerable extra demand on this sector.

The high level of non-decent accommodation identified by the SCS, combined with the rapid expansion of this type of housing, demonstrates the need to increase the regulation of this sector to ensure good quality accommodation is available to all tenants.

Current activity

Under the Housing Act 2004 some larger HMOs require a licence from the Council to operate. These are properties that have 3 or more storeys and are occupied by 5 or more persons sharing. The licence holder and manager must be a “fit and proper person” and licences must be renewed every 5 years. The Local Authority has a duty to inspect licensed properties and can impose licence conditions where appropriate to ensure standards are maintained. Approximately 60 HMOs in North Somerset are licensed, however, these properties represent only a small proportion of the privately rented stock.

Advice and information is provided to tenants and landlords, and complaints about poor housing conditions in private rented accommodation are responded to within target timescales. We will continue to develop the advice and information we provide to landlords, through the Landlords Forum and the joint West of England work and events, including the annual Landlords Expo.

We introduced the North Somerset Property Accreditation Scheme which is aimed at improving private rented accommodation and provides benefits for both

landlords and tenants. The scheme is operated across the West of England and is currently being reviewed and evaluated.

A programme of prioritising HMOs is being undertaken which we will complete by mid 2013 .

Priorities

- In addition to mandatory licensing the Housing Act 2004 also allows Councils to introduce discretionary licensing schemes for private rented properties in their areas if they consider this necessary. We will complete a project to further analyse standards of management in the concentration of privately rented homes in Weston Super Mare to consider what policy responses should be pursued, including the potential use of these discretionary licensing powers, to ensure the effective regulation of these properties.
- To introduce a programme of risk based inspections for known HMOs
- To review the current Accreditation scheme, in partnership with the other West of England authorities.
- To review the assistance available for landlords and owners of empty homes to assist in improving their properties to meet the Decent Homes Standard, in return for agreeing nomination rights to the property.

Enforcement - We will complete the updating of our Enforcement Policy;

- The revised enforcement policy will ensure our regulatory and enforcement functions are administered in full compliance with national policy framework.
- The policy will apply across the full range of legislative procedures including dealing with public health complaints, unauthorised encampments and other service requests.
- Harassment & illegal eviction – we will continue to investigate complaints that we receive and take action where appropriate in accordance with our revised enforcement policy. Referrals will be investigated and limited resources focused on the most serious cases.

Owner Occupied Sector

Introduction

This sector represents the largest proportion of the housing stock (72.7%) with 49% owning their home outright. These properties vary considerably in age, type and condition.

Whilst it is primarily the homeowners responsibility to maintain their own home, some homeowners, especially the elderly and vulnerable do not have the resources to do so. The resulting poor quality housing can impact on the health and safety of the occupants.

The loss of national Private Sector Renewal Funding has led to the move away from direct financial assistance for renewal through grant aid to the development of loans.

Current activity

In conjunction with 9 other Local Authorities, North Somerset established a loan consortium for home owners in 2004, working with Wessex Home Improvement loans (WHIL), with initial funding obtained through a successful bid to the former Government Office for the South West. The scheme provides low cost loan funding for vulnerable households to enable them to carry out essential repairs to their homes to bring them up to the Decent Homes Standard. A range of loan products are available to ensure that even those on very low incomes are able to secure funding for essential works.

In the few cases where loan funding is not available help and assistance is given to advise people on their housing options.

Where category 1 hazards are identified and the owner is either unable to secure loan assistance or other funding to remedy the hazard, or is not prepared to do so, appropriate legal action is taken in line with the councils Enforcement Policy.

Where we receive complaints about the impact of an occupiers living conditions on other people these complaints are fully investigated and enforcement action taken where necessary in line with the councils enforcement policy. Advice and assistance is given where homeowners are unable to deal with problems themselves and referrals are made to partner agencies as appropriate. West of England (WE) Care and Repair are supported to provide a Handyvan Service to assist with small repairs and improvements.

Working in partnership with WE Care and Repair and other agencies, assistance is also given to improve and adapt houses to ensure people can be safely discharged from hospital, without delay.

Priorities

- We will continue to work with and support WHIL to utilise the full range of loan products available and develop further products as necessary. We will continue to fund the loan pot (resources permitting) with a long term aim of making the fund self sustaining.
- To enhance the technical advice and assistance available for owner occupiers, particularly in relation to disrepair and routine maintenance .
- To develop our Community Connect Partnership early intervention work to promote awareness and early uptake of services to meet needs, as set out below.

Early Intervention and Support for Older and Disabled People

Introduction

A key aim of the Councils Corporate Plan is to;

“Improve outcomes for adults by promoting independence, choice and control over services”.

Developing a range of housing, care and support options to enable older people to live independently in the community, including meeting the increasing demand for adaptations supports the delivery of this aim.

This Delivery Plan will also support the main vision identified in the Councils Early Intervention and Prevention Strategy 2011 – 2015, that adults and older people in North Somerset will experience improved health, well-being and independence.

Early preventative action, even at a low level, will often prevent the need for significant public resources to provide care and support over the longer term.

Current Activity

The demand for the mandatory Disabled Facilities Grant continues to increase with approximately 300 DFGs delivered last year, at a cost of over £1.6 million.

To ensure good value for money a new contract for the provision of stair lifts, step lifts and through lifts was awarded last year. The contract was for the

provision of a Total Management Solution where a stair lift is installed and maintained for as long as that person requires it. A contract to provide ramp access to properties, through a system of metal ramps that can be fully recycled has also been agreed.

Where a property can not be adapted to meet a persons longer term housing needs, either due to the property being inadaptable or the expense being prohibitive, advice and assistance on re-housing options is offered.

We have a close working relationship with our partners at West of England Care and Repair, who were successful in obtaining the new Home Improvement Agency contract which commenced in October 2012.

Priorities

- Continue to explore the most cost effective ways of delivering adaptations including tendering the provision of bathing works.
- Continue to streamline the adaptation process with a view to introducing a paperless system and enabling more effective remote working.
- To evaluate the potential to introduce alternative funding options for works above the grant limit and explore other options for top up funding.
- We will develop our joint work with the Health, Social Care and Public Health services as part of the Community Connect Partnership to target older people living in poor housing conditions. Through this initiative we will target specific communities to make older and disabled people aware of the help that is available through both the council and its partners, including support for completing essential repairs and maintenance.

Affordable Warmth and Home Energy Efficiency

Introduction

North Somerset Council is committed to supporting the eradication of fuel poverty and the provision of affordable warmth through energy efficient accommodation for all households. To ensure progress towards this objective the Council is working in partnership with several agencies across the health, environment and community safety sectors.

Figures from the Department of Energy and Climate Change (DECC) indicate that homes contribute nearly 40% (2010 figures) to the carbon footprint in North Somerset and the Stock Condition Survey 2011 shows there are still 31,000 homes in North Somerset that have no or little insulation. Many of these have

solid walls or are properties of a non-traditional construction that have low levels of thermal efficiency and are therefore expensive to heat. Fuel poverty levels have doubled in the last 5 years and there are now an estimated 11,000 fuel poor households in North Somerset. The Government is committed to the reduction of carbon emissions by 34% by 2020 compared to emissions in 1990.

The Energy Act 2011 introduced legislation to launch the Green Deal initiative which will replace the current funding regime for improving home energy efficiency, alongside funding provided through the Energy Company Obligation (ECO). The role of Local Government in these schemes is still emerging but the formation of partnerships of local authorities and others is likely to be the preferred option for North Somerset.

Current activity

To date North Somerset council has taken a very proactive role on promoting affordable warmth and reducing fuel poverty. Support has been given through referrals to the National Warm Front scheme and locally through the Warmstreets Scheme, run on behalf of, and in partnership with, the Somerset local authorities, through the Centre for Sustainable Energy in Bristol. These schemes have now ended. and the new opportunities provided by the Energy Act 2011 and the Green Deal and ECO funding need to be fully explored.

North Somerset Council is also making a commitment to low carbon activity through signing a '*Climate Local*' commitment. This is a Local Government Association initiative to support councils' efforts both to reduce carbon emissions and also to improve resilience to the effects of our changing climate and extreme weather. Our commitment states that:

We recognise that our council has an important role to help our residents and businesses to capture the opportunities and benefits of action on climate change. These include saving money on energy bills, generating income from renewable energy, attracting new jobs and investment in 'green' industries, supporting new sources of energy, managing local flood-risk and water scarcity and protecting our natural environment.

The two key commitments for this delivery plan drawn from the Climate Local Plan are:

- 1) To achieve significant home energy efficiency improvements to all sectors of housing in North Somerset, and
- 2) To raise awareness of affordable warmth, renewable and low carbon forms of energy and how to reduce household expenditure on fuel.

The government requested Local Authorities to provide an updated report in relation to the Home Energy Conservation Act 1995 which was submitted in April 2013 (insert link). We commissioned the Centre for Sustainable Energy to provide the appropriate data on which to base this report and to produce a comprehensive energy database which will facilitate the better targeting of resources and engage with Green Deal delivery.

Priorities

- Explore/ evaluate options for maximising benefits from the Green Deal and ECO funds. Facilitate the provision of loans and Green Deal / ECO funding through partners.
- Work with partners and link to early intervention / home safety initiatives to promote home energy efficiency improvements targeted on vulnerable groups.
- Promote cheaper ways of paying for fuel and raise awareness of different payment methods and tariffs.
- Monitor progress to improve home energy efficiency in advance of next Home Energy Conservation Act report due in March 2015.
- To work in the private rented sector to secure improvements to homes with a SAP rating below “E” to comply with the Energy Act 2011 commitment.
- Raise the profile of fuel poverty in Health and Well-being Strategies and during Joint Strategic needs Assessment updates.

Gypsy and Travellers

Introduction

The Council has responsibility under the Housing Act 2004 to assess the accommodation needs of gypsies and travellers. The most recent assessment has identified unmet need for 60 residential pitches and 5 transit pitches in North Somerset. The council own 3 sites within North Somerset which contain 7 pitches in total.

Current Activity

Site improvements to one of our existing sites were completed in 2012 and funding has been secured to extend the Willowmead site to provide two additional pitches during 2013.

A business and investment plan for all our sites is being finalised and we are in the process of commissioning an external organisation to take on the management of our sites.

Opportunities are being investigated on new developments and a Registered Provider has made a successful funding bid to the Homes and Communities Agency to provide 29 new pitches in North Somerset, including transit provision.

Priorities

- To extend and improve the Willowmead site
- To finalise our investment plan for all council owned our sites.
- To transfer the site management function to an external contractor from May 2013.
- In conjunction with colleagues in Planning services to work to identify additional sites to meet the need for additional pitches.

Park Homes / Caravan Sites

Introduction

Park Homes, especially older homes tend to offer poor thermal insulation and are traditionally occupied by elderly and vulnerable residents on a low income. Fuel poverty and affordable warmth are often therefore major issues for these residents.

In 2011 the council carried out a review of Park Homes, the purpose of the review was to investigate and identify issues affecting park home residents and set out an action plan to address issues identified. A survey of residents was carried out and the results revealed:

- Almost 90% of respondents to the survey were over 60
- 25% of respondents considered themselves to be disabled
- 43.1% respondents were dissatisfied with maintenance on the sites
- 87% of respondents were satisfied with the site as a place to live and 95% were satisfied with their home.

New legislation (Mobile Homes Act 2013) introduces charges for some caravan and park home site licensing functions, enhancing the rights of Park Home

owners and providing new local authority enforcement powers where management of sites is poor.

Current Activities

The service currently licence all Park Home and Caravan sites, along with responding to complaints and other requests for service. Delivering the outstanding actions identified from the Park Homes review are also a priority, however this will be dependent on being able to develop a self funding scheme to licence and regulate all caravan sites following new national legislation..

Priority

- Develop a project plan for the introduction of new site licensing legislation from April 2014.
- Over the next 12 months ensure site owners are aware of their responsibilities and that residents are provided with information in relation to living on a Park Home site.

Appendix 1

Action Plan

Private Rented Sector

Action	By When	By Who	Resource	Performance Measure
Introduction of a discretionary HMO licensing scheme in central W-s-M.	June 13	Private Rented Housing Team	In house Fee income	Implementation of new scheme after consultation.
Review need to introduce further additional discretionary licensing schemes.	Sept 14			Review complete.
Complete the prioritisation of known HMO's	Mid 2013	Private Rented Housing Team	In house	Completion of HMO prioritisations
Confirm programme of risk based inspections	Oct 13			Inspection programme agreed.
Review assistance available for landlords, including empty property owners	Annual review	Private Housing/ Empty Property Officer	In house	Annual Revision of Housing Renewals Assistance Policy
Further develop advice and assistance to tenants on their rights and responsibilities.	March 14 Annual review.	Private Rented Housing Team	WoE Private Sector Housing Forum	Information on web site.

Review Accreditation Scheme	Oct 2013	Private Rented Housing Team	Jointly with other WOE authorities	Implementation of new scheme.
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Enforcement

Action	By When	By Who	Resource	Performance Measure
Revision of Enforcement Policy	December 2013	Private Sector Housing Team	In house	Approved policy

Owner Occupied Sector

Action	By When	By Who	Resource	Performance Measure
Develop initiatives to target assistance to those on low income and living in the poorest housing conditions.	March 2015	Adaptation and Improvements Team	Wessex Home Improvement Loans / WE C&R Adult Care	Number of new initiatives developed and homes improved.
Enhance advice and assistance to homeowners - disrepair and home maintenance	Ongoing	Adaptation and Improvements Team	In house WoE	Information available on the web site

Early Intervention and Support for Older and / or Disabled people

Action	By When	By Who	Resource	Performance Measure
Continue to streamline the adaptation process	March 14	Adaptation and	Existing / improved	New paperless

with a view to introducing a paperless system and enabling more effective remote working.		Improvements Team	ICT	system introduced
Continue to further explore the most cost effective ways of delivering adaptations including tendering the delivery of bathing improvements/adaptation	Dec 2013	Adaptation and Improvements Team	Existing and WoE partners.	New ways of working implemented, bathing contract in place.
Enhance advice and assistance on Housing Options in Later Life.	March 14	Housing Options Team. WE C&R	In house WE CR	Information and processes reviewed. Develop PI on move on options – volumes, savings.
Evaluate alternative funding for adaptations through loans for works above mandatory limits.	March 14	Adaptation and Improvements Team	In house Wessex HIL	Revision to HRAP / Protocol with RSLs
Develop our joint work with the Health, Social Care and Public health services.	March 14	Adaptation and Improvements Team.	Private Sector Housing Team, Public Health	1) Evaluate and expand Check and Connect, 2) Evaluate Sandford and Winscombe community connect project. Programme roll out agreed.

Home Energy Efficiency

Action	By When	By Who	Resource	Performance Measure
Explore and evaluate options under the Green Deal and ECO and agree way forward	Dec 13	Adaptations and Improvements Team	In house WOE retrofit group	Partnership delivering in place by Dec 13.
Promote cheaper ways of paying for fuel / awareness payment methods and tariffs.	Dec 2013	Adaptations and Improvements Team	In house	Training programme for key staff and publicity in NS Life Social tariffs. Smart meters.
Through the Climate Local commitment; achieve significant home energy efficiency improvements across the domestic sector in North Somerset.	March 2015	Adaptations and Improvements Team Carbon Board Sustainability Officer	Housing Renewal Assistance ECO funds WHIL	Periodic monitoring of improved homes and carbon reduction.
To work in the private rented sector to secure improvements to homes with a SAP rating below "E" to	Ongoing	Adaptations and Improvements Team / Private Rented Team	Private Sector Housing Team	Monitor improvements to 2018.

comply with the Energy Act 2011 commitment.				
Raise the profile of fuel poverty in Health and Well-being Strategies	End 2013	Adaptations and Improvements Team, KH Lead	In house / WE retro fit group / public health	Tackling fuel poverty included in Public Health Strategy and revised JSNA

Gypsy and Travellers

Action	By When	By Who	Resource	Performance Measure
Complete the extension of Willowmead	March 2014	Private Rented Team	HCA funds	Extension completed and occupied
Transfer the site management function.	July 2013	Strategy and Commissioning Team	Strategy and Commissioning Team	Site management transferred
Produce investment plan for Council owned sites	October 2013	Private Rented Team	Capital budgets	Scheduled investment completed.
Identify additional sites / extra pitches	2015	Private Sector Housing team / planning team	Private Sector Housing team / planning team / strategy and commissioning	New pitches provided

Park Homes

Action	By When	By Who	Resource	Performance Measure
Complete the project delivery plan for implementation	April 2014	Private Housing Rented Team	TBC	New procedures developed for implementation

of Mobile Homes Act				by enactment date
Provide information and advice for park home owners on the new licensing regime.	April 2014	Private Rented Housing Team	TBC	Information published and available.
Incorporate the development of community engagement with park home sector as part of implementing the Mobile Homes Act 2013. .	April 2014 Ongoing	Private Rented Housing Team	In house Fee income	Number of residents groups established.

Appendix 2

Summary of Responses to Consultation

Response	Reply
Private rented sector	
<p>Exploration of a priority to sustain tenancies – linkages to the Housing Options Teams. There is plenty of evidence which suggests that there is an under supply of private rented accommodation and increasing rents. Landlords with good accommodation will drive up rents, which in turn affects the whole sector. Benefits are a year behind rent level increases causing a margin between affordable rents. This could lead to an increase in evictions for failure to pay rent and a reluctance by Landlords to take up vulnerable households.</p>	<p>The Strategic Housing Team are actively working to increase the supply and quality of private rented housing through incentives and support for landlords. This work will continue to minimise the impact of welfare reform.</p> <p>The Council cannot influence the local housing allowance rates but have passed comment to the team.</p>
<p>Letting agent Regulation. Letting agent fees are one of the main barriers to access PRS accommodation – completely extortionate and another reason why Homechoice is over subscribed. We should regulate them like in Scotland and get proper fixed price fees. The public are being forced into debt to secure housing in the private sector.</p>	<p>The government has recently announced that new legislation is to be introduced to give the landlord and tenants protection from unscrupulous letting agents, in the form of an amendment to the Enterprise and Regulatory Reform Bill. The detailed information has yet to be confirmed.</p> <p>When the details are available they will be publicised on the Council’s website and we plan to engage directly with the sector to promote the protection available. A review our Accreditation Scheme will extend to local agents.</p> <p>Through our Private Sector Housing Forum we regularly update agents on good practice.</p>
<p>The jury is still out on the benefits of discretionary licensing as a good accreditation scheme has been proven to be equally beneficial. So would suggest that the discretionary licensing review could be linked to the accreditation</p>	<p>The discretionary licensing proposal does incorporate a review of the Accreditation Scheme.</p>

actions.	
Too many requirements such as licenses, overbearing bureaucracy etc. Will put off some landlords and reduce availability	We thoroughly assess the benefits of any new scheme before introduction and minimum bureaucracy is applied.
Stronger links to be made in the energy efficiency actions to the private rented sector as major failings in Decent Homes in the private rented sector are attributed to a lack of heating or insulation. Much of the stock is old and deteriorating. The action on the link to energy is not currently SMART.	The stock condition report highlighted poor thermal comfort as a major factor contributing to poor housing and our planned interventions under energy and affordable warmth will target the areas with the highest numbers of poorly insulated stock. We will publicise and promote new funding regimes through the Green Deal and energy companies.
Enforcement	
Linkages to the Enforcement Concordat	The review of the Enforcement Policy will be conducted in line with the Statutory Code of Practice for Regulators which replaced the Enforcement Concordat.
None but it would be useful for the reader to understand in more detail what the enforcement discipline entails. Talks about housing complaints but no explanation of enforcement powers and consequences of taking such action	All public authorities are required to comply with the Statutory Code of Practice for Regulators. The consultation on the Enforcement Policy will be publicised on the Councils website and will contain full details of powers, actions and their justification.
Owner Occupier Sector	
Responses & reply duplicated.	
Early Intervention and Prevention	
Has there been any impact from the reablement programme as this also relates to early intervention and has an effect on the DFG budget. DFGs are the last resort in reablement and the effects have been felt in Somerset.	We are aware of the potential impact reablement can have on the demand for DFG's but have not noted to date any significant increase but will keep under review.
In Long Ashton there is a voluntary organisation which has a stock of donated stair lifts, commodes, tilting chairs, bath lifts etc which they install for the elderly as required and then remove when no longer needed and fit in to another residents house. West of England Care	West of England Care and Repair are not generally involved with removal of equipment but the Long Ashton initiative is interesting and has been referred to Adult Social Care to investigate.

and Repair are clearly doing something similar but being paid for it! Perhaps the Voluntary Sector should be encouraged.	
A telephone line that elderly people could contact the Council that does not require many buttons to be pressed as they are often hard of hearing and may have arthritic fingers that makes telephone manipulation hard.	Noted . Referred to Corporate Team as a suggestion. Carelink call system is widely promoted, by all professionals in the district. This is a monitored community alarm system that provides help at the touch of a button, 24 hours a day.
Re: the Move-On Assistance. This is the problem – there is nowhere to move that is suitable and to make it suitable you need far more funding than you have to make this possible.	We are working to support the development of more accommodation suitable for the elderly and disabled e.g. Extracare because we recognise the importance of choice when making these decisions. We regularly review the level of Move On Assistance but are limited by capital resources.
Affordable warmth and home-energy efficiency	
The Green Deal, whilst we think that something similar is a good initiative we consider that there will not be a large uptake due to the high level of interest rates.	The Green Deal interest rate has been raised nationally which is why we are working to develop a low cost loan with our partner Wessex Home Improvement Loans.
Properties are required to have an efficiency certificate but the research into the efficiency of solid walls versus cavity walls has not been completed sufficiently for the figures to be accurate and therefore meaningful. There is no point in producing inaccurate assessments of heat efficiency.	We are well aware of the limited technical evidence for some elements of solid wall insulation and would not promote or commit to any project until satisfied on all aspects. We are working with colleagues across the West of England and DECC on ways to maximise new funding available but this would not be at the expense of quality and value.
Gypsy and Traveler Community	
More training in North Somerset for the service about this unique community group.	A course has been developed by the North Somerset Partnership Gypsy and Traveler group and is regularly run for partnership staff.

Park Homes	
<p>Can we assume that the Mobile Homes Bill also relates to Park homes? Residents are very sensitive to how they are referred to. It is difficult to comment on the proposed legislation as we do not have detail. However we feel that discussion between the park owner and residents should be encouraged and some form of arbitration should be available.</p>	<p>The Mobile Homes Act 2013 has now been enacted and the main provisions come into effect in April 2014. There is a broad definition and Park Homes are definitely included. Guidance has yet to be issued but we plan to consult widely with both Park Home owners and site owners.</p>
<p>More regulation normally makes more cost which will inevitably be passed onto the tenants. When they are at the lower end of the housing ladder this may be detrimental.</p>	<p>The guidance is awaited on the fee structure under the legislation but know any fees must be in line with approved policy which will relate to the actual cost of administering the licensing scheme.</p>



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Help is also available for people who require council information in languages other than English.

Please contact 01934 426 673.