Housing and Public Health Policy Committee

Members of the Housing and Public Health Policy Committee:

Cllr T Blowfield (Chairman)
Cllr N Legg (Vice-Chairman)
Cllr V Bell
Cllr L Neal
Cllr S Thomson
Cllr G Walden
Cllr N Ward

* Please note change of time and room

If any member of the public wishes to speak on a non-confidential item, they may do so at the discretion of the Chairman

Contact
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If you have any special requirements in order to attend this meeting, please let us know in advance

Large print version can be made available

Agenda

Date
Wednesday 17 October 2012

Time
* 10.00 am
(A briefing and training discussion for Members on the function of policy committees will start at 9.15am)

Place
* Blomefield Room
South Norfolk House
Swan Lane
Long Stratton Norwich
NR15 2XE
AGENDA

1. To report apologies for absence and identify substitute voting members (if any);

2. To deal with any items of business the Chairman decides should be considered as matters of urgency pursuant to Section 100B (4) (b) of the Local Government Act, 1972. Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency;

3. To receive Declarations of Interest from Members;
   (Please see guidance form and flow chart attached page 4)

4. Review of the Empty Homes Work Programme (attached - page 6)
   (10.10am)

5. Tenancy Strategy (attached - page 18)
   (10.30am)

6. Work Programme (attached - page 34)
   (11.15am)
Working Style of the Cabinet Policy Committees

**Member Leadership**
Members of the Committees will take the lead in understanding the direction provided by Cabinet and delivering work to Cabinet requirements. Whilst recognising political allegiances, members will work in a collaborative manner with officers and cabinet portfolio holders to consider the relevant issues when developing Council policy.

**Collaborative Working**
All meetings of the Committees will be constructive and conducted in a spirit of mutual respect and trust. Officers will commit to supplying meetings with information relevant to making informed decisions on policies and matters. Members will commit to thoroughly reading and understanding papers, raising questions that are pertinent to the issues at stake. Members will, where feasible, agree definable actions to be taken forward by officers to develop policy, rather than having items for noting or simply to discuss.

**Frequency and Nature of Meeting**
Each Committee will have at least 3 formal, public meetings per year. In assessing items delegated by Cabinet for review, the Committee may decide that it wishes to meet on a more or less frequent basis.

The Committee may also hold informal meetings should it require in order to progress specific items in detail. However, if the Committee is meeting to determine whether to refer items for Cabinet approval, the meeting should follow the Council’s Standing Orders and thus be subject to a formal agenda, be held in public and the meeting recorded.

Informal meetings may be held in any manner suitable for conducting business (e.g. via meeting, conference call, circulation of information via e-mail, or site visits); while relevant information will be supplied by officers where appropriate, these meetings will not be subject to a formal agenda or minutes. Where business of the Committee is undertaken through informal meeting, all members of the Committee will be provided opportunity to participate.

**Training**
Members commit to undertaking development – for example, attending formal training sessions, or reading relevant background material, in order to properly equip themselves to deliver their expected role fully.

**Accountability**
The Policy Committees will be accountable to Cabinet. They will not be able to make decisions themselves, but can recommend decisions to Cabinet. Cabinet may review whether the Committees are discharging their duties effectively, and may receive progress reports on how the Policy Committee is working to discharge its duties.

**Work Programmes**
The Work Programmes for the Policy Committee will be established by Cabinet. Members of the Committee will not be able to raise items to be included in the work programme. Where topics have been identified for inclusion in the work programme, the Committee will work to identify how it will discharge its responsibilities, including the resources required to do so.

**Managing Time**
However the Committee is meeting, it will attempt to conclude the business of each meeting in reasonable time. The Chairman will be responsible for ensuring the meeting stays focused on pertinent issue, and does not become side-tracked on issues that are not relevant to the policy under consideration, or those that should be discussed by a separate committee.
DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.

Does the interest directly:
1. affect yours, or your spouse / partner’s financial position?
2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner?
3. Relate to a contract you, or your spouse / partner have with the Council
4. Affect land you or your spouse / partner own
5. Affect a company that you or your partner own, or have a shareholding in

If the answer is “yes” to any of the above, it is likely to be pecuniary.

Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.

Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.

Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST INSTANCE
DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF

What matters are being discussed at the meeting?

Do any relate to an interest I have?

A Have I declared it as a pecuniary interest?

OR

B Does it directly affect me, my partner or spouse’s financial position, in particular:

- employment, employers or businesses;
- companies in which they are a director or where they have a shareholding of more than £25,000 face value or more than 1% of nominal share holding
- land or leases they own or hold
- contracts, licenses, approvals or consents

The interest is pecuniary – disclose the interest, withdraw from the meeting by leaving the room. Do not try to improperly influence the decision.

If you have not already done so, notify the Monitoring Officer to update your declaration of interests

The interest is related to a pecuniary interest. Disclose the interest at the meeting. You may make representations as a member of the public, but then withdraw from the room.

Does the matter indirectly affects or relates to a pecuniary interest I have declared, or a matter noted at B above?

The Interest is not pecuniary nor affects your pecuniary interests. Disclose the interest at the meeting. You may participate in the meeting and vote.

Have I declared the interest as an other interest on my declaration of interest form? OR

Does it relate to a matter highlighted at B that impacts upon my family or a close associate? OR

Does it affect an organisation I am involved with or a member of? OR

Is it a matter I have been, or have lobbied on?

You are unlikely to have an interest. You do not need to do anything further.
Review of the Empty Homes Work Programme

Housing Standards Manager

The report reviews the progress made in reducing the number of long term empty homes following the introduction of a new methodology in 2010 and the range of measures available to the Council to support this work programme.

Based on experience gained since its introduction, the report proposes increasing the number of empty homes contacted each year and to use the full range of advice and regulatory provisions to support this work programme.

Cabinet member(s): Yvonne Bendle
Ward(s) affected: All

Contact Officer, telephone number, and e-mail: Tony Cooke 01508 533754 tcooke@s-norfolk.gov.uk

1. Background

1.1. A key role for South Norfolk as Strategic Housing Authority is making best use of existing stock. Empty Homes are not only a wasted asset that should be contributing to meeting South Norfolk's housing need but also lost revenue. A proactive programme of targeting empty homes is an effective way of reducing the number of such properties in a manageable, sustainable way.

1.2. The primary aim of the long term empty homes work is to minimise the number of long term empty homes in the district thereby maximising the use and effectiveness of the existing stock. The secondary aim is stopping empty homes becoming blight locally. The approach to the work is firstly to provide advice and assistance to help the owners of those properties to achieve a satisfactory outcome and secondly to use formal direct action in cases where a negotiated solution cannot be reached.

1.3. Unlike some other parts of the country, South Norfolk does not have large clusters of empty homes. The properties are “pepper potted” throughout the district and each has its own “story”.
1.4. Prior to 2010 the Council’s approach to this work was reactive, responding to complaints and requests for assistance or periodic mail outs to empty home owners. In September 2010 the Council introduced a new methodology for responding to and dealing with long term empty homes which uses an assessment process to identify the properties that are having the most adverse effect on the surrounding neighbourhood and those that can make the most effective contribution to meeting housing need.

1.5. The 2010 Council Tax data base was used as a baseline and a risk based assessment was applied to those empty properties recorded as being in categories ‘C’, ‘L’ and ‘Q’. These categories are respectively Empty Properties where a 90% charge was due, repossessed dwellings which were unoccupied and unoccupied dwellings formerly owned/leased by a bankrupt. In 2010 South Norfolk reported 1560 empty homes of which 501 had been empty for more than six months and which were assessed. These were assessed and a priority based work programme was prepared of proactively engaging with owners.

1.6. Priority was given to those properties that had been on a 90% charge for at least six months. This means the prioritised properties will have been empty for at least twelve months and is a pragmatic view, recognising that the process of marketing, selling and reoccupying may take some time especially with the current state of the housing market.

1.7. Properties were assessed using a risk based assessment system and put into bands A, B or C.

1.7.1. Band A comprised properties assessed as highest priority (accounting for 11% of empty homes).

1.7.2. Band B comprised properties where proactive enforcement would be dependant on resource (accounting for 60% of empty homes).

1.7.3. Band C comprised properties assessed as low priority (accounting for 29% of empty homes).

1.8. Upon completion of the banding a rolling programme of action aimed at engaging with the owners of ten properties a month commenced.

1.9. For the period April 2011 to July 2012, 217 properties were investigated and their owners contacted. As a result of this contact, 118 properties were removed from the long term empty database; these included properties brought back into use by the owner, sold or following discussions with the owners, properly re-classified as second homes. 62 properties were considered to have a justifiable reason for still being empty; the main reason being issues around protracted probate and building works. These properties are kept under review. In 37 cases the owners have failed to respond to officers or we have not been able to locate an owner. Over this same period, other long term empty properties came onto the list.

1.10. Table 1 shows South Norfolk’s empty homes data as reported to the government for the 5 year period from 2007 to 2011. The large reduction in 2009 is
accounted for by a change in the way data was collected. The underlying trend is down.

<table>
<thead>
<tr>
<th>Year</th>
<th>Empty Homes Total</th>
<th>Empty 6 over months</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>1503</td>
<td>438</td>
</tr>
<tr>
<td>2010</td>
<td>1560</td>
<td>501</td>
</tr>
<tr>
<td>2009</td>
<td>1614</td>
<td>504</td>
</tr>
<tr>
<td>2008</td>
<td>1523</td>
<td>657</td>
</tr>
<tr>
<td>2007</td>
<td>1366</td>
<td>618</td>
</tr>
</tbody>
</table>

2. Current Position and Issues

2.1. There are currently some 470 long term empty properties in South Norfolk including a few properties that have been empty for over 10 years and on which the owners have continued to both pay the appropriate council tax and undertake basic property and garden maintenance. The work currently being undertaken is to progressively tackle the homes that have been empty the longest, reducing the number to a residual level at which any action by the Council would be unreasonable or would not justify the resource required to undertake the work.

2.2. Additionally, the Council is currently liaising with other authorities in Norfolk regarding implementation of the Government’s changes to council tax exemptions and discounts on empty and long-term empty homes. This is currently the subject of work by a county-wide Technical Leads Group and therefore is not the subject of detailed consideration here. However, the new provisions will increase the cost of an empty home, so it can be expected to reduce the overall number long-term empties; although to what extent is difficult to judge at this stage.

2.3. 31 of the 470 long term empty properties in South Norfolk are derelict properties which have been taken off the Council Tax database by the Valuation Officer because of their condition. These properties are still standing, though often in considerable disrepair, and can blight their neighbourhood.

3. Proposal and Reasons

3.1. The Council has a number of formal measures available in the cases where advice, persuasion and negotiation have been unsuccessful. Appendix One shows a list of the provisions available to the Council to deal with empty properties. They generally fall into two types of action.

3.2. The first action seeks to remedy the consequences of the property being empty in terms of the nuisance to neighbours and blight on the street scene. Experience shows that this type of action needs to be repeated as the situation that gives rise to property being empty remains unchanged.
3.3. The second type of action seeks to remedy the cause, and can range from removal (demolition) of an unsuitable property to a temporary or permanent forced change of ownership. The effect of this is to change the ownership to an owner who will bring the property back into use. The Council used this second type of action to deal with long standing problem properties in Caistor and Trowse. In the Caistor case the Council determined the most appropriate course of action was for the property to be demolished and the site cleared. In the Trowse case the Council imposed an Empty Dwelling Management Order causing the property to be renovated and let through our Home Options scheme. Under this type of action the freehold remains with the owner but the Council takes over the management of the property. This course of action can be costly. Although we are able to recover our costs, this can be over a long period of time as they are recovered through the rental income.

3.4. The Government has announced it intends to make changes to the Empty Dwelling Management Order (EDMO), requiring the property to be empty for a minimum of two years before an order can be imposed. Such a change will have little impact on our work programme.

3.5. Compulsory Purchase and Forced Market Sale provisions differ from EDMO’s in so far that the freehold is passed to a new owner. This type of action can be cost effective, enabling the Council to recover its costs at an early stage from the sale of the property. These provisions have been used elsewhere in Norfolk to tackle a number of high profile problem empty dwellings where the owners would either not engage or could not be found.

3.6. To date South Norfolk has not resorted to these measures but as mentioned in paragraph 2.4 above, we now have a number of cases (approximately 17% of property owners contacted) where the owners are not engaging or cannot be found. Compulsory Purchase or Enforced Sale need to be used cautiously but may be the most appropriate course of action in the most protracted cases.

3.7. A key role for South Norfolk as Strategic Housing Authority is making best use of existing stock. Empty Homes are not only a wasted asset that should be contributing to meeting South Norfolk’s housing need but also lost revenue. A proactive programme of targeting empty homes is an effective way of reducing the number of such properties in a manageable, sustainable way.

3.8. Based on our experience gained since 2011 it is proposed to increase the number of long term empty properties engaged with per month, with the aim of ensuring each property is reviewed within a twelve month period. It is also proposed to use the full range of support and regulatory provisions available to the Council, including Compulsory Purchase and Enforced Sale. A flow chart setting out this approach is attached as Appendix Two which will be incorporated as part of an empty Property Plan in the forthcoming review of the Council’s Housing Strategy.

4. Other Options

4.1. The Council could determine to move away from a proactive managed approach to dealing with Empty Homes to a reactive complaint led approach. Impact on
the local neighbourhood including complaint is factored into the current assessment process and influences the priority. A complaint led approach could be seen as an inconsistent approach leading to lost opportunities for bringing long term empty homes back into use and negatively affecting Council Tax collection and New Homes Bonus allocations.

5. **Relevant Corporate Priorities**

5.1. Enhancing our quality of life and the environment we live in.

5.2. Promoting a thriving local economy.

5.3. Supporting communities to realise their potential.

5.4. Driving services through being businesslike, efficient and customer aware.

6. **Implications and Risks**

6.1. Financial - the number of long term Empty Homes impacts on the New Homes Bonus the Council receives from Central Government. In the year 2011 the empty homes work programme contributed £42,000 to the Councils New Homes Bonus allocation

6.2. Legal – the Council could face a legal challenge if it failed to deal with an individual Empty Home which was causing a local problem. Opponents to new housing schemes use the number of empty homes to challenge the need for further housing.

6.3. Environmental – long term Empty Homes can blight the street scene, village view and local landscape

6.4. Crime Reduction – long term Empty Homes can be a focus for anti-social behaviour.

7. **Conclusion**

7.1. Long term empty homes are not only a wasted resource asset for the owner, but can also be a source of complaint to their neighbourhood. Empty homes brought back into use can contribute to the housing supply to meet local needs and help tackle homelessness and prevent neighbourhood decline. Bringing empty homes back into use is a priority for the coalition government and additional powers have given to Council’s to be able to increase the Council Tax on long term empty homes.

7.2. The Council needs a planned work programme to effectively manage this important area of work and to demonstrate that where appropriate it is prepared to use the necessary sanctions and measures where advice and assistance has not secured the best outcome for the neighbourhood.
8. **Recommendations or Action Required**

8.1. That a revised updated work programme be prepared comprising all the long term empty properties on the 2012 Council Tax database and those properties deemed derelict by the Valuation Officer and the properties be engaged with in accordance with the flow chart attached as Appendix Two.

8.2. That the Director of Development and Environment in consultation with the Portfolio holder for Housing and Public Health have delegated authority to commence Compulsory Purchase and Enforced Sale action where that has been determined the best course of action to resolve a long term empty home.
Appendix One

The enforcement options

Prior to commencing any formal action an assessment is undertaken in every case to determine the most appropriate course of action for the particular circumstances. This process enables officers to consider all the possible options that are available to satisfactorily resolve the situation.

There are two main enforcement outcomes

1. To reduce the negative effect of an empty property on the neighbourhood
2. To effect a change of ownership that will bring the empty property back into use.

Enforcement to reduce the negative effect of a property on the neighbourhood.

Typically this would be used in the case where the primary concern was the detrimental effect the empty property was having on the surrounding environment. Works include action to improve or make safe the building itself or to clear the garden or site that was overgrown or was collecting rubbish. Such actions will not necessarily lead to the property becoming occupied and, unless the owner is cooperative, further similar actions will be needed in the future as the property is again neglected.

If the owner has been uncooperative the usual outcome is that the Council will need to undertake works in default of the owner and pay for the costs of the clearance/remedial works. The cost of these works, which are registered as a charge on the property, cannot be reclaimed until the property is sold.

Such enforcement action could be carried out under the following legislation

Town and Country Planning Act 1990 Section 215

This power allows the council to serve a notice on either land or buildings to improve the outside look of the property concerned. If the owner fails to comply the works can be carried out in default.

Building Act 1984 Section 79

This power allows the council to serve a notice on a building that is in a ruinous or dilapidated state and can require works of repair or restoration (or steps for demolition of any part of the building) to improve the outside look of the property. If the owner fails to comply the works can be carried out in default.

Housing Act 2004 Part 1

This Act gives the Council the duty to act when a category 1 hazard is established through a Housing Health and Safety Rating System (HHSRS) assessment. Whilst mainly used for occupied property, the powers also apply to unoccupied
accommodation as the assessment of risk is based on the most vulnerable potential occupant, whether or not the property is occupied at the time of inspection. An improvement notice can be served on the owner for works to be carried out to remove the category 1 hazards. If the owner does not carry out the works (and does not successfully appeal to the Residential Property Tribunal against the notice) the works can be carried out in default by the Council. The costs of the works can be recorded as a charge against the property.

Other legislation

The council does have a number of other powers it may choose depending on the exact circumstances of the case. These include the Environmental Protection Act 1990 sections 79-80, sections 77-78 of the Building Act 1984, Prevention of Damage by Pests Act 1949 section 4, section 34 of the Public Health Act 1961, the Local Government Miscellaneous Provisions Act 1982 section 29.

These have a similar effect of either reducing the negative impact of the building or removing a particular nuisance occurring at the property. They do not of themselves bring a property back into use or make it suitable for occupation.

Enforcement to effect a change of ownership that will bring the empty property back into use.

There are three main enforcement routes to actually bring the property back into use.

Compulsory Purchase Orders

Councils have powers to provide housing, and one of the ways they can do this is by buying land for building houses or by altering, adapting and improving existing buildings for housing. Specific powers in Section 17 of the Housing Act 1985 allow councils to compulsorily purchase individual empty homes to enable them to be used for housing or sold on for housing.

Councils also have wide ranging power to improve local well-being. This power is sometimes called the “well-being power” or “the power of first resort”. It gives councils the power to do anything that they think is likely to improve the social, environmental or economic well-being of the area. This may include dealing with empty properties which are unsightly, or damage the local environment. Specific compulsory purchase powers are contained in section 226 of the Town and Country Planning Act 1990; these allow councils to compulsorily purchase land or property for the purpose of improving social, environmental or economic well-being.

Compulsory Purchase Orders (CPO’s) must be formally approved by the Council and then follow a statutory process. There is a potential to incur capital costs if the owner objects and a public enquiry is held. The value can change between valuation, purchase and resale and there will always be legal costs to the procedure. However a CPO will bring the property back into use by either a back to back arrangement with a Registered Housing Provider to purchase the property for letting or by the Council ensuring the property is renovated and occupied.
**Enforced sales**

Councillors are able to force the sale of empty homes. They can achieve this through strategic use of legal powers designed to recover debt. Where homes have been abandoned it is not unusual for debts to accumulate through unpaid bills. Some debts may be charged against the property with a charging order. Where the council has debts charged in this way they can recover them through legal action. The outcome is that either the owner repays the debt or the property is sold in order to recover the debt.

Where, after payment is demanded by the council the debt remains unpaid, the council can serve a notice under section 103 of the Law of Property Act 1925 of their intention to make an application to sell the empty property. If payment has still not been made three months after service of the notice the Council can apply to the Local Land Registry to register the local land charges - in priority to any other charges - and to make a formal application for registration under the Law of Property Act. This gives the council the right to sell the property, and for the council's charge to take precedence over other charges on the property.

The property is then put on the market and sold to the new owner with a clean title, although the local authority may choose to sell the property with a specific condition that it will be renovated and brought into use within a specified time. The right of appeal by the owner is to the Court of Appeal. If the debt is due to unpaid council tax the council must follow a different procedure but the end result is the same.

The starting point for an enforced sale is registering a land charge debt on the property. This debt would usually be caused by works in default being carried out by the council under an enforcement measure to reduce the negative effect of the property on the neighbourhood. It is therefore important to be clear whether the council is prepared to use the enforce sale procedure at an early stage when dealing with an empty property so that the correct charge can be placed on the property when the owner subsequently does not cooperate.

The disadvantage from the point of view of bringing a property back into use is that the debt can be paid at anytime prior to the sale completion. If the debt is paid in full then the owner remains as an uncooperative owner of an empty home and other action would need to be started from the beginning.

**3. Empty Dwelling Management Orders**

Empty Dwelling Management Orders (EDMO’s) are a legal power that enables councils to put an unoccupied privately owned home back into use. The provisions are contained in the Housing Act 2004 Part 4. The powers ultimately allow councils to take over the management of a home for a period of up to seven years - the council is able to renovate the property, let it and collect the rent. The rent is paid to the council, who are able to recover any costs they may have incurred by taking possession of the property and making it habitable, as well as the routine costs of maintenance and letting. However, any money over and above these costs is to be paid to the owner of the property.

The Department for Communities and Local Government announced on 7 January 2011 they would be making changes to EDMO’s through amendments to secondary legislation by summer 2011. However this legislation has not yet been implemented. These changes limit the authorisation of interim EDMO’s to those properties empty for
over two years; require the local housing authority to provide all the information they have that the empty property has been causing a nuisance to the community and that there is community support of the proposal of the local housing authority to take control of the empty home.

EDMO’s are not practical where the property is in a poor condition. The council has to pay for the works up front and where costs exceed around £30,000, the amount spent would not necessarily be able to be recouped over the seven year term of the EDMO. It is usually the properties that are in the worst condition that have been causing most nuisances to the neighbourhood and for these properties EDMO’s may be too expensive.

The council has one EDMO in place and was one of the first authorities to use this power. We are therefore confident that we can demonstrate our ability to use this power in the future where it is the most appropriate course of action. For future EDMO’s we would need to secure a partner managing agent. Our intention is to enter into discussions with a Registered Provider operating in the area.
Appendix Two
Empty Homes
Workflow

Work Program

Initial letter to owner

Response Received
Yes
Agree course of action
Yes
Update records

No
Reminder letter to owner

Response received
Yes

No
Site Visit

Warning letter to owner

Response received
Yes

No
Determine appropriate course of action

Commence Action
Tenancy Strategy

The Council is under a legal duty to publish a Tenancy Strategy by 15 January 2013. This report provides contextual information, raises the key issues, and seeks the Committee’s views on the working draft version which is attached. The Committee’s views will influence the consultation draft which it is intended to use as a basis for consultation with housing associations and other local partners in November.

1. **Background**

1.1. The Localism Act 2011 requires each local housing authority to have an adopted tenancy strategy by 15 January 2013. Section 150 of the Act requires the tenancy strategy to set out the matters to which registered providers of social housing (housing associations) for its district are to have regard in formulating policies relating to –

   a) the kinds of tenancies they grant,
   b) the circumstances in which they will grant a tenancy of a particular kind,
   c) where they grant tenancies for a term certain, the lengths of the terms, and
   d) the circumstances in which they will grant a further tenancy on the coming to an end of an existing tenancy.

1.2. Section 151 details further requirements, namely that the local authority must send a draft to every housing association with social housing in the district, and provide a reasonable opportunity to comment. Also, the strategy must have regard to the housing allocation scheme and the homelessness strategy.

1.3. There has not previously been a duty to produce a tenancy strategy, so the formal statement of principles in the working draft is new to South Norfolk. Although the tenancy strategy is a significant document, the Localism Act has not
provided local housing authorities with any enforceable powers: tenancy strategies are intended to influence, guide and advise the tenancy policy of each housing association through the provision of ‘good practice’ expectations, operational practices and relevant Council policies that we wish housing associations to conform with.

1.4. To achieve adoption by the required date the following timetable is proposed:
   - November-December – consultation with housing associations and other interested organisations,
   - 7 January 2013 – adoption by Cabinet.

2. Current Position and Issues

2.1. The key requirement for a tenancy strategy arises from the introduction of fixed term tenancies. The Government introduced these tenancies to make it easier for tenants to move about within the affordable housing sector and to help ease pressures of overcrowding and under-occupation. Guidance from the Homes and Communities Agency to housing associations states, “In the majority of cases the minimum term … is 5 years. However RPs [Registered Providers] are able to offer tenancies, down to a minimum of 2 years, where there are exceptional reasons for doing so.” This provides the starting point for the Council’s expectations.

2.2. Government guidance requires housing associations to have regard to tenancy strategies in relation to tenancy management policies, but it explicitly states that there is no requirement for housing associations to have regard to local authorities’ wishes concerning rent setting. Nevertheless, the attached working draft includes a section on Affordable Rents because affordability could be relevant to tenancy offer or renewal.

2.3. 17 housing associations currently have rented stock in South Norfolk. As many have stock in other local authority areas, they have expressed a wish for all Norfolk tenancy strategies to be consistent, and to reflect their existing tenancy policy documents.

3. Proposal and Reasons

3.1. At the Committee’s informal meeting on 4 September 2012 members received a copy of a briefing for councillors by Shelter: Creating a tenancy strategy suitable for your area. That document raises some principles and sets out Shelter’s views.

3.2. Below are listed important issues for the tenancy strategy, some of which are drawn from the Shelter briefing, and on which Members might wish to focus:

   a) The standard minimum term for a tenancy will be 5 years, but a shorter period of not less than 2 years is appropriate in exceptional circumstances. The working draft leaves housing associations to define these ‘exceptional circumstances’.
b) Should people receiving long-term support have a tenancy of more than 5 years, including the possibility of a lifetime tenancy?

c) Should tenancy duration and review take account of children’s educational requirements?

d) Community sustainability is important, but Shelter suggests that shorter tenancies do not support this principle. What are the Committee’s views?

e) The working draft advocates that tenancy reviews should start at least 6 months before a tenancy is due to expire. Do members agree with this approach?

f) Should the conduct of the tenancy be considered in deciding whether to renew a tenancy?

g) There is currently no presumption of renewal of a tenancy, although paragraph 5.2 refers to tenants being able to remain in their home as long as they require it. Is this acceptable?

3.3. Members are asked to consider the principles and the text of the draft tenancy strategy, and to suggest any changes they wish to see in the consultation draft.

4. Other Options

4.1. Producing a tenancy strategy is a statutory requirement. Although there are currently no penalties for failing to have a tenancy strategy, the Government could introduce penalties, for instance by making funding available only to compliant local authorities.

5. Relevant Corporate Priorities

5.1. Enhancing our quality of life and the environment we live in – the strategy seeks to make the best use of the affordable housing stock for those in housing need.

5.2. Supporting communities to realise their potential – access and retention of a suitable home improves the life chances of tenants and their families.

6. Implications and Risks


6.2. Legal – the requirement to publish a tenancy strategy in accordance with S150 (4) of the Localism Act 2011 and Statutory Instrument 2012 No. 57.

6.3. Equalities – officers have undertaken an equalities screening and have identified no adverse impacts.

6.4. Risks – none identified.
7. Conclusion

7.1. The Localism Act 2011 places a duty on the Council to adopt a tenancy strategy, and when the attached working draft is finalised it will fulfil all requirements.

8. Recommendations or Action Required

8.1. That members consider working draft of the tenancy strategy and provide guidance for officers about the contents of the version to be issued for consultation.
INTRODUCTION

This Tenancy Strategy document sets out South Norfolk Council’s response to housing reforms contained within the Localism Act 2011 and their application by Housing Associations. Our strategy has been prepared to provide flexible direction and guidance to Housing Associations operating in the South Norfolk District.

We recognize that a single solution will not meet everyone’s affordable housing needs.

The Council welcomes the potential flexibilities created by the Localism Act, and looks forward to working and agreeing with Housing Associations how these can be best implemented in the South Norfolk District.

We warmly welcome comments from partner Housing Associations and key stakeholders on our proposed Tenancy Strategy.

Please Note:
This draft Tenancy Strategy should also be considered alongside the South Norfolk “HomeOptions” Housing Allocations Policy.

Housing Association Partners are encouraged to read the South Norfolk HomeOptions Housing Allocations Policy before reading this draft Tenancy Strategy consultation document if they have not already done so.

Please go to: www.snhomeoptions.org.uk

The closing date for responses is: ?? December 2012.

Responses can be made either in writing or via email to:
Abi Dennington-Price, Housing Enabling Officer
Housing Strategy & Enabling Team
Development & Environment Directorate
South Norfolk Council
Swan Lane, Long Stratton, Norfolk, NR15 2XE.
Email: dennington@s-norfolk.gov.uk.

If you would like to discuss any aspects of the Tenancy Strategy please:
Keith Mitchell, Housing Strategy Manager
Email: kmitchell@s-norfolk.gov.uk Telephone: 01508 533756

or
Abi Dennington-Price, Housing Enabling Officer
Email: dennington@s-norfolk.gov.uk Telephone: 01508 533783
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BACKGROUND

1.1 In 2010 the Government issued a consultation document: ‘Local decisions: a fairer future for social housing’. The document proposed a package of reforms to give Local Housing Authorities and Registered Providers (including Housing Associations) more flexibility to make the best use of their housing stock in ways which best meet the needs of their local area. Included in the consultation were proposals to:

- improve the flexibility of tenancies that Housing Associations can grant, e.g. enabling them to offer “lifetime security” where it was needed, and to set a shorter-term tenancy where it was more appropriate;
- introduce a new type of mid-range affordable housing tenure called “Affordable Rent”, which was to be higher than social rents but lower than private rents (the maximum to be charged was 80% of the open market rent);
- make it easier for existing affordable housing tenants to move about within the affordable housing sector to help ease pressures of overcrowding and under-occupation.

1.2 In 2011 the Government passed the Localism Act; the sections relevant to this consultation document came into force in January 2012. The Act was introduced to facilitate a number of Government initiatives, including some major reforms within the affordable housing sector that were first explored in the above-mentioned 2010 consultation – \textit{and in particular the three proposals noted above}.

1.3 A specific requirement of the Act is for all Housing Authorities to have an agreed Tenancy Strategy in place by January 2013.

\textit{The draft consultation document you are reading is South Norfolk Council’s response to this requirement: we look forward to receiving any comments and views you may have.}
HOUSING SERVICE AIM

Our over-arching aspiration is that everyone living in South Norfolk is able to live in safe, secure and appropriate accommodation.

TENANCY STRATEGY AIM AND OBJECTIVES

2.0 Our key aim for our Tenancy Strategy is:

2.1 to provide clear requirements and guidance on the ways in which Housing Associations operate in South Norfolk in terms of their:
- housing lettings and use of housing stock,
- types and tenures of tenancies offered,
- tenant/tenancy reviews,
- tenant advice, guidance and support services.

3.0 Our key objectives for South Norfolk Council’s Tenancy Strategy are:

3.1 to support the on-going work of Council officers, Housing Association colleagues and other key stakeholders to ensure the best use of the existing affordable housing stock in South Norfolk by reducing under-occupancy and improving the match between affordable housing needs and the homes that are available;

3.2 to re-affirm the Council’s priority of reducing and preventing homelessness. (For example, the Council would not support a Housing Association approach that would result in a household becoming homeless and in priority need as a result a fixed term tenancy being terminated), see 3.6;

3.3 to help maintain the stability of affordable housing, and to ensure that the assurances it provides to vulnerable households in crisis are not eroded;

3.4 to facilitate stable and sustainable communities - especially those in rural parts of our district where local community infrastructure such as schools, shops and local groups are supported by balanced populations, including newly-forming households and young families;

3.5 to ensure that specialist accommodation within the affordable housing sector is made available to households who are most in need;

3.6 to ensure that every tenant of affordable housing receives regular advice and assistance from their Landlord during the full term of their affordable housing journey (no matter how long) and particularly during tenancy reviews, enabling them to fulfil any aspirations and abilities they may have to progress through different tenures.
CONTEXT

4.0 The South Norfolk District : Affordable Housing Need and Rental Costs
4.1 South Norfolk Council no longer owns any affordable housing (having transferred its housing stock to Saffron Housing Trust in Spring 2004). As well as Saffron Housing Trust, there are a number of other affordable housing providers who also own and manage affordable housing in the District, and all will be expected to have an embedded regard to this Tenancy Strategy within their housing policies and ways of operation in the District.

4.2 The Greater Norwich Housing Needs Survey published in 2006, and updated via the Housing Market Assessment Update undertaken in 2011, identifies a high need for affordable housing: 193 homes per year, of which 147 should be for rent. For South Norfolk, these findings are supported by the figure of 3,360 households registered on the South Norfolk Housing Register (“HomeOptions”) at 1st April 2012.

4.3 The high level of affordable housing need results substantially from difficulties in buying a home, illustrated by high house price to income ratios: at the end of 2011 the ratio of lower quartile house prices to lower quartile incomes was 7.54*. *Data Source: HM Land Registry via Norfolk County Council Norfolk Insight portal.

The Costs of Renting: Comparison Table

4.4 The table below illustrates the differences between the average weekly cost of open market rent, Affordable Rent, and Social Rent for comparable properties in the South Norfolk District.

4.5 The figures have been derived from information provided by Saffron Housing Trust, the Housing Association with the largest stock in South Norfolk. Please Note: open market rents are for the types of property owned by Saffron. Market rents can vary widely, depending on the size, location and overall condition of property.

<table>
<thead>
<tr>
<th>Property Type</th>
<th>£ Per Week Average Market Rent</th>
<th>£ Per Week Average Affordable Rent (80% of Market Rent)</th>
<th>£ Per Week Average Social Rent (inc. service charges)</th>
<th>£ Per Week Difference (+/-) between average Affordable and Social Rents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Bedroom Flat</td>
<td>98.08</td>
<td>78.46</td>
<td>65.29</td>
<td>+13.17 (20%)</td>
</tr>
<tr>
<td>1 Bedroom Bungalow</td>
<td>110.18</td>
<td>88.14</td>
<td>71.51</td>
<td>+16.63 (23%)</td>
</tr>
<tr>
<td>2 Bedroom Flat</td>
<td>119.63</td>
<td>95.70</td>
<td>72.29</td>
<td>+23.41 (32%)</td>
</tr>
<tr>
<td>2 Bedroom Bungalow</td>
<td>130.15</td>
<td>104.12</td>
<td>79.77</td>
<td>+24.35 (31%)</td>
</tr>
<tr>
<td>2 Bedroom House</td>
<td>128.63</td>
<td>102.90</td>
<td>82.25</td>
<td>+20.65 (25%)</td>
</tr>
<tr>
<td>3 Bedroom House</td>
<td>142.70</td>
<td>114.16</td>
<td>88.59</td>
<td>+25.57 (29%)</td>
</tr>
<tr>
<td>4 Bedroom House</td>
<td>No Data</td>
<td>No Data</td>
<td>100.75</td>
<td>No Data</td>
</tr>
</tbody>
</table>

4.6 The table above shows that social rented homes which are converted to affordable rent will be (on average) between 20% and 32% more expensive.

5.0 The South Norfolk “HomeOptions” (Choice-Based) Housing Allocations Scheme
5.1 Applications for a housing association property are made through South Norfolk Council’s HomeOptions scheme. HomeOptions is designed to ensure that applicants in housing need are prioritised, and that home they obtain is suitable for their needs. The HomeOptions scheme was comprehensively reviewed in April 2012. Two key outcomes were more robust eligibility criteria and a more streamlined application process.

5.2 This Tenancy Strategy has been written to complement our HomeOptions Housing Allocations Policy, and deliberately does not repeat any specific requirements of that policy (e.g. the criteria for how housing register applicants are, and are not, suitable for particular property types and
sizes). However it is important to the Council that applicants who become Housing Association tenants are able to remain in their home as long as they require it and are advised on and enabled to fulfil any other tenure aspirations only if they are appropriate and sustainable. Therefore the Tenancy Strategy provides continuity, seeking to ensure that successful applicants do not again fall into housing need.

5.3 **Items covered in this Tenancy Strategy that are not in our HomeOptions Policy include:**

- stakeholders’ joined-up approaches to tenant/tenancy reviews;
- the use of Starter (‘Introductory’) and fixed-term tenancies;
- the Affordable Rent tenure;
- arrangements for when a fixed-term tenancy will not be renewed.
SOUTH NORFOLK COUNCIL’S TENANCY STRATEGY EXPECTATIONS

6.0 Our General Expectations of Housing Association Partners (‘Registered Providers’)
South Norfolk Council expects Housing Associations to adhere to the following over-arching principles:

6.1 their commitment to working closely with all relevant Council officers to ensure their tenants receive the best housing service possible;

6.2 that their policies fully support South Norfolk Council’s regarding our work to reduce and prevent homelessness. (The Council is unlikely to support any approach that would see a household become unintentionally homeless as a result a fixed-term tenancy being terminated);

6.3 for general needs housing, tenancies will be for not less than 5 years;

6.4 tenancies for a shorter period (between 2 and 5 years) will be granted only in exceptional circumstances;

6.5 to ensure the appropriate use of Introductory Tenancies, and to regularly review their merits;

6.6 that providers of specialist older people’s supported housing will offer lifetime tenancies;

6.7 that households who are receiving long-term support that is related to their housing receive lifetime tenancies, or longer (than 5-year) fixed-term tenancies, depending on their needs;

6.8 that policies and working practices will be shaped to actively support the stability of households with school-age children, scheduling fixed-term tenancy durations and reviews to avoid unnecessary disruption to school careers;

6.9 that where a tenant may require a major adaptation to their home, that a full assessment of the housing options for that tenant be undertaken to ensure the most appropriate outcomes for the tenant are reached in terms of necessary changes to their current home/tenancy;

6.10 a clear commitment to creating and maintaining sustainable communities in both urban and rural settings;

6.11 openness and transparency around the use of the Affordable Rent tenure, including how properties are selected for this rent model, and how tenants will be assessed to ensure they can afford a home available at this rent level.
7.0 **Types of Tenancies**  
7.1 The Council accepts that Housing Association partners should be afforded some flexibility around the range of affordable housing tenancies that they are able to offer. Whilst the Council recognises the predominant use of Lifetime Tenancies will be the typical approach, we also appreciate that there could be cases where a short-term tenancy may be more appropriate/practical.

7.2 Where a shorter-term tenancy is proposed, the Council expects that 5 years will be the standard minimum term (following any probationary period);

7.3 notwithstanding 7.2 above, the Council acknowledges that, in exceptional circumstances, a shorter term tenancy may be appropriate, but when that is the case a tenancy must not be for less than 2 years. The ‘exceptional circumstances’ should be set out in the Housing Association's Tenancy Policy;  

7.4 With regards to 12 month Introductory (‘Starter’) Tenancies, in general the Council supports the use of these provided they are linked to either a further 5 Year Tenancy or a Lifetime Tenancy.

7.5 For the avoidance of doubt, the Council requires that for Sheltered Accommodation, Housing with Care and other forms of supported accommodation where a tenant has a lifelong housing and support need (and would be disadvantaged by being offered a shorter-term tenancy) a lifetime tenancy is offered.

8.0 **Tenancy Reviews**  
8.1 The Council’s expectation is that Housing Association partners will adopt and follow a meaningful and transparent Tenancy Review Process. It is important that the Housing Association clearly sets out the reasons why any decisions are taken.

8.2 A comprehensive advice, signposting and assistance service should be provided, particularly when alternative housing has been identified as the most appropriate outcome.

8.3 It is expected that a full review will be carried out by Housing Association partners at the end of every tenancy term, commencing at least 6 months before a tenancy is due to expire. The Council is committed to working closely with Housing Association partners to ensure appropriate assistance is given to all parties during the review process and would expect to be informed of and, where relevant, engaged in these.

8.4 As part of the review process, the Council expects that Housing Association partners will ensure that at least the following areas are considered:

- the current circumstances of the household, the need for the type of property, the size of the property;
- the current financial circumstances of the household;
- the conduct of the tenant(s) and other members of the household during the tenancy;
- the longer term aspirations of the household.

8.5 It is expected that whenever the Housing Association proposes not to renew a tenancy the household will be referred to the Council’s Housing and Advice Team before the final decision is reached.

9.0 **The “Affordable Rent” Tenure**  
9.1 Housing Associations that have been accepted into the Homes & Communities Agency’s 2011-2015 Affordable Housing Programme (AHP) are required to charge an ‘Affordable Rent’ for some of the properties within their stock that become available for re-letting, and also for the majority of affordable housing built after 1st April 2011.

9.2 Whilst the Council acknowledges that it does not have a direct role in determining (what in most cases is anticipated to be higher) levels of Affordable Rent set by Housing Associations, we do expect that when setting rent models/levels, Housing Associations give due regard to the affordability of the home to any existing and/or future tenant(s). This is to ensure that those tenants are not discouraged or prevented from securing suitable affordable housing due to being disadvantaged financially because of the higher rent. Housing Associations will
be expected to set rents at a level that enables the home to be affordable to the household size it has been built to accommodate, including those in low-paid work as well as those on full Housing Benefit.

9.3 Following the above, the Council’s full expectation is that Housing Associations will monitor and analyse the impacts of Affordable Rent levels on households where no Housing Benefit or only part Housing Benefit is received.

9.4 Lastly, the Council also expects Housing Association partners to monitor and analyse impacts of introducing fixed-term tenancies in place of assured tenancies, and to share with the Council and other stakeholders the findings of these activities. The importance of this work cannot be overstated given the forthcoming changes to Welfare Reform.

S106 Agreement Requirements
9.5 The Council also draws the attention of Housing Association partners to the number of Section 106 Agreements in place across the District which specifically refer to ‘Social Rent’: it is our long-term expectation that we shall not permit such existing affordable housing units to change to Affordable Rent at re-let. This includes any existing social rented housing delivered in rural villages under the ‘rural exceptions site’ policy. Where a Section 106 Agreement refers simply to ‘Rented’ affordable housing units, the general expectation is that any such units may become Affordable Rented.

10.0 Under-Occupation and Overcrowding
10.1 The Council will support Housing Association partners to address overcrowding and under-occupation in appropriate cases to enable the best use of the available housing stock, taking into account the circumstances of the households involved. However, this must be balanced with the needs of other applicants on the Housing Register. Therefore we would not support any proposals that gave a disproportionate advantage to existing tenants.

11.0 Disposal of Existing Stock
11.1 Due to the high need for affordable housing in the District the Council would prefer to see existing affordable housing stock levels maintained for as long as possible. We are therefore unlikely to support a request from a Housing Association partner to dispose of any of their affordable housing stock unless we are satisfied that all alternatives have been fully explored by the Housing Association (with no satisfactory outcome identified), and that a full consultation with the Council and the local community has been held on the impact of the loss of the stock in the given location.

12.0 Local Lettings Plans
12.1 The Council is willing to consider a Local Lettings Plan to support local housing needs / issues. Any such policy should take account of the Council’s agreed Tenancy Strategy and the Housing Association’s lettings policies. The impacts of any such policy should be reviewed on a regular basis to ensure adherence and identify positive and negative outcomes. The Council’s Local Lettings Policy sits within our HomeOptions Housing Allocations Policy and the proposal would need to be agreed by the Local Lettings Panel. The presumption should always be that a Local Lettings Plan is temporary in order to address a specific need. Any agreed Local Lettings Plan must be reviewed annually with a report provided to the Council to enable the Lettings Panel to agree any proposed continuation.
13.0 Housing Associations' Tenancy Policies

13.1 With the foregoing in mind, Housing Associations should clearly set out their approach to the range of tenancies they are able to offer in a published Tenancy Policy, which should include the following:

13.2 the type of tenancies they can/will grant; and the circumstances in which particular tenancies will be offered;

13.3 where tenancies are offered/granted for a fixed term duration, the length of that term, and the criteria for justifying the specified fixed-term;

13.4 Note: for general needs housing, it is expected that fixed-term tenancies will not be granted for terms of less than five years, following any probationary period, unless there are ‘exceptional circumstances’ (Housing Associations are expected to set out in their Tenancy Policy the ‘exceptional circumstances’ in which they will grant a fixed-term tenancy of less than 5 years);

13.5 the circumstances in which they may or may not grant another tenancy on the expiry of a fixed-term tenancy (either in the same property or in a different property);

13.6 the advice and assistance they will give to tenants on finding alternative accommodation in the event that they decide not to grant another tenancy and how they will liaise with the Council’s Housing and Advice Team (including how reviews will be undertaken in a timely way to ensure tenants are given sufficient time to consider the options available to them, and to make preparations for securing alternative accommodation where appropriate);

13.7 their policy on granting discretionary succession rights, taking account of the needs of vulnerable household members;

13.8 for the Affordable Rent tenure, how properties identified for this rent model will be selected, and how prospective tenants will be assessed (to ensure the property is properly affordable for any household considering entering into a tenancy under this rent model);

13.9 their policy on appeals, which clearly sets out the way in which a tenant or a prospective tenant may appeal or complain against:
  - the length of any fixed-term tenancy offered, and/or
  - the type of tenancy offered, and/or
  - a decision not to grant another tenancy on the expiry of the fixed term;

Specialist Housing Needs / Requirements

13.10 their policy on taking into account the needs of households who are vulnerable by reason of age and/or disability or illness, including through the provision of tenancies which provide a reasonable degree of stability;

13.11 their arrangements for vulnerable client groups to ensure that all communication is appropriate to their particular needs.

Appeals

13.12 Social landlords must ensure that all appeals are dealt with in accordance with the procedures set out in Statutory Instrument 2012/695 Flexible Tenancies (Review Procedures) Regulations 2012.
14.0 Discharging our Homelessness Duty

14.1 It is not always possible to meet housing applicants’ aspirations to have an affordable home within the affordable housing sector. The Council, therefore, works closely with landlords from all housing sectors to identify ways of meeting applicants/households housing needs in the most appropriate way. This includes maximising the potential to use the private (rented) housing sector to its fullest extent, and ensuring that it can be an option for (and of) choice.

14.2 As part of this, the Council intends to use the new flexibilities open to us to discharge our Homelessness Duties within housing in the private rented sector. Such housing will be deemed as being suitable for this purpose where the property fully meets the required standards and a 12-month tenancy can be secured.

14.3 It is acknowledged that homes in the private rented sector can vary significantly in terms of the state of repair, range of amenities, and the quality of management practices. Through our Private Sector Housing Team, the Council actively encourages private sector landlords to become accredited, and part of our strategic housing activity includes working to actively increase the supply of suitable private sector accommodation in the district to build up this alternative housing resource.

14.4 The Council will review the outcomes of tenancies offered in the private (rented) housing sector, and undertake an analysis of the difference this resource has made in reducing the need for and time spent in temporary accommodation (and any associated costs), and any impacts on repeat homelessness. This work will also need to take account of any impacts arising from Welfare Reform and the introduction of Universal Credit – the individual impacts of both will need to be clearly identified.

15.0 The Way Forward

15.1 This Tenancy Strategy is a new document, produced to respond to new legislation: monitoring and review of the agreed aims and objectives, particularly in terms of take-up by Housing Associations, is therefore a key element. With this in mind:

15.2 As part of our “HomeOptions” housing allocation process, housing allocations will be monitored on a regular basis (together with local housing needs and housing market data) to establish the impacts and benefits of recent changes in legislation to ensure that we continue to meet the housing needs of residents across the district;

15.3 We propose to informally review the aim and objectives of the agreed strategy with housing association partners 12 months after it has been introduced. The outcome(s) of that work will determine whether any formal changes are required.

We look forward to receiving any comments and views you may have.
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<th>Topic</th>
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<td>Housing Strategy Manager and Cllr T Blowfield</td>
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<td>Officer report and discussion</td>
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<td></td>
<td>Housing Strategy</td>
<td>Housing Strategy Manager and Cllr T Blowfield</td>
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</tr>
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