

Agenda Item No: 9
Report To: Cabinet Members
Date of Meeting: 15 December 2022
Report Title: Private Sector Housing Strategy
Report Author: Julian Watts
Job Title: Private Sector Housing Manager
Portfolio Holder: Cllr. Andrew Buchanan
Portfolio Holder for: Housing



Summary:

Poor housing conditions can have a serious negative impact on both the physical, mental and wellbeing of its occupants. Currently the Council does not have a Private Sector Housing Strategy. The proposed Strategy intends to outline the Council's approach to ensuring that residents across our borough live in homes that are safe, well maintained and meet required standards

Key Decision: NO

Significantly Affected Wards: All Wards

Recommendations: **The Cabinet/Committee/Board is recommended to:-**

- I. Approve the Private Sector Housing Strategy – **Appendix 1**

Policy Overview:

Financial Implications:

- No financial implications envisaged by adopting the strategy.

Legal Implications:
Text agreed by [title of Legal Officer] on [date]

- Strategy seen by legal – no amendments or comments made.

Equalities Impact Assessment: See Attached - **Appendix 2**

Data Protection Impact Assessment: Not required –N/A

**Risk Assessment
(Risk Appetite
Statement):**

N/A

**Sustainability
Implications:**

The strategy would play an important part of how the council engages with the private sector in addressing energy efficiency within homes and reducing the use of fossil fuels, which is a key component in achieving our carbon neutral targets. Failure to do this effectively will increase the risk of the council not meeting its commitments to be carbon neutral by 2050

**Other Material
Implications:**

There are no other material implications.

**Exempt from
Publication:**

No

**Background
Papers:**

None

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Report Title: Private Sector Housing Strategy

Introduction and Background

1. The Private Sector Housing team within the council provides a number of services, disabled facility grants, dealing with complaints about landlords, ensuring standards are maintained in houses of multiple occupation and overseeing park home licence conditions. Our primary function is to work with landlords to raise standards by ensuring their properties comply with housing legislation.
2. Poor housing conditions can have a serious negative impact on the physical, mental and wellbeing of its occupants. Currently the Council does not have a Private Sector Housing Strategy. The proposed Strategy intends to outline the Council's approach to ensuring that residents across our borough live in homes that are safe, well maintained and meet required standards

Proposal

3. The proposed Private Sector Housing Strategy sets out how we intend to meet challenges and opportunities confronting the service and set out key priorities. Whilst housing conditions in Ashford are generally good, there are landlords who are failing to meet their obligations. The private rented sector provides a valuable component of our overall housing stock. The strategy will not just focus on improving housing standards by improving living conditions, but also include a range of services to improve people's wellbeing. The private sector team is committed to improving housing conditions across all tenures.
4. The Housing Strategy includes a delivery action plan on the various services we provide, which will be reviewed each year.

Equalities Impact Assessment

5. Members are referred to the attached Assessment – **Appendix 2**. No key issues

Consultation Planned or Undertaken

6. The Strategy has been fully considered internally incorporating advice from a number of departments and is supported by the Portfolio Holder for Housing.

Other Options Considered

7. No other options were considered.

Reasons for Supporting Option Recommended

8. N/A

Next Steps in Process

9. Once the Strategy has been adopted it will be made available on the Council's Website.

Conclusion

10. The Strategy will set out an action plan on how Private Sector Housing intends to improve standards, tackle rogue landlords, help increase the independence of disabled people through the disabled facilities grants scheme, reduce fuel poverty and improve energy efficiency of homes. This in turn will contribute to the delivery of our Corporate Plan themes of Caring Ashford and Green Pioneer.

Portfolio Holder's Views

11. It is important that everyone living in the borough can live in a safe, well-maintained home that is suitable for their needs. We understand good housing, as illustrated in the graphic below, plays an integral part in the health and wellbeing of everyone living in our society and it is widely recognised that there is a direct link between poor housing and poor health.
12. The Council is committed to ensuring that residents living in the private sector, whether that be as owner occupiers, or in rented accommodation, live in homes that are safe, well maintained and meet the required standards. The reliance on rented accommodation is expected to grow due to the high costs of buying a home and the limited supply of social housing.
13. This strategy and action plan sets out how we intend to improve standards, tackle rogue landlords, help increase the independence of disabled people through the disabled facilities grants scheme, reduce fuel poverty and improve the energy efficiency of homes. This in turn is contributing to the delivery of our Corporate Plan themes of Caring Ashford and Green Pioneer.

Contact and Email

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Private Sector Housing Strategy

2022 – 2027

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Foreword

It is important that everyone living in the borough has the opportunity to live in a safe, well maintained home that is suitable for their needs. We are well aware that good housing, as illustrated in the graphic below, plays an integral part in the health and wellbeing of everyone living in our society. And that it is widely recognised that there is a direct link between poor housing and poor health.

Good housing is:



The Council is committed to ensuring that residents living in the private sector, whether that be as owner occupiers or in rented accommodation, live in homes that are safe, well maintained and meet the required standards. The reliance on rented accommodation is expected to grow due to the high costs of buying a home and the limited supply of social housing.

This strategy and action plan sets out how we intend to improve standards, tackle rogue landlords, help increase the independence of disabled people through the disabled facilities grants scheme, reduce fuel poverty and improve the energy efficiency of homes. This in turn is contributing to the delivery our Corporate Plan themes of Caring Ashford and Green Pioneer.

Good housing is and will continue to be fundamental to helping all our residents to live well and realise their full potential.

Cllr Andrew Buchanan

Portfolio Holder for Housing

1. Introduction

Poor housing conditions can have a serious negative impact on both the physical and mental health and wellbeing of its occupants.

- Houses with serious disrepair and deficiencies such as inadequate fire safety measures, uneven floor surfaces, dangerous electrical wiring can lead to accident or injury.
- Cold and damp housing can have a major impact on illnesses such as heart disease, stroke and respiratory conditions and can also increase the risk of falls.
- Inadequate hygiene, sanitation and water supply can cause illness and disease such as gastro-intestinal disease.
- There is a higher incidence of falls where people are living in unsuitable housing which needs adaptation, such as, hand rails, ramps, level access or adapted facilities for personal care needs.
- Children's development and educational achievement can be adversely affected by cold, damp conditions, overcrowding and lack of facilities.

A Building Research Establishment (BRE) report in 2021¹ estimated that poor housing in England could be costing the National Health Service (NHS) £1.4billion a year in treatment bills. Most common hazards are those that cause injuries on stairs, while the costliest issue for the NHS (£857million p/a) is poor quality housing leading to excess cold.

1.1 Overview of Private Sector Housing in Ashford Borough

The majority of homes in the borough are owner occupied (70%), with 16% in the private rented sector.

Total number of dwellings	52,397 ^[JS1]
Owner occupied	36,490 (70%)
Private rented	8,549 (16%)
Social rented	7,358 (14%)

Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

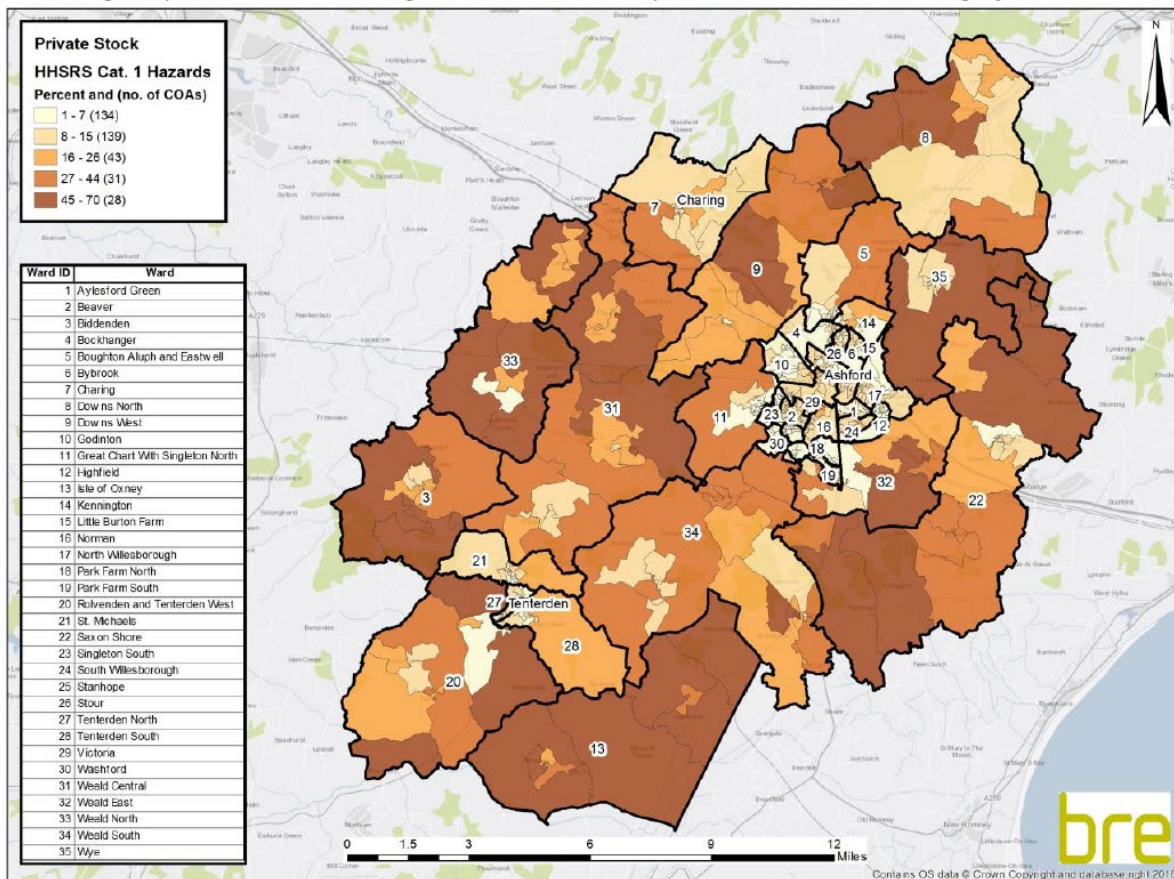
The Health and Housing Safety Rating System (HHSRS)² was introduced to enable the assessment of dwellings to avoid or at the least to minimise potential hazards. Potential hazards are scored with the most serious falling in to Category 1.

The BRE study identified 6,495 dwellings in the private sector have category 1 hazards. In the private rented sector, 893 dwellings have category 1 HHSRS hazards. The highest concentrations of all HHSRS hazards in the private sector are found in the wards of Isle of Oxney, Biddenden and Downs West. The estimated total cost of mitigating category 1 hazards in Ashford's private sector stock is £18.9 million

¹ <https://bregroup.com/press-releases/bre-report-finds-poor-housing-is-costing-nhs-1-4bn-a-year/>

² Housing Health and Safety Rating System (England) Regulations 2005 (SI 2005 No 3208)

Percentage of private sector dwellings in Ashford with the presence of a HHSRS category 1 hazard



Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

A good standard of energy efficiency in dwellings is important for people to be able to adequately heat their homes and not fall into fuel poverty. Reducing energy usage in domestic dwellings is also critical in efforts to reduce greenhouse gas emissions and tackle climate change.

An Energy Performance Certificate (EPC) gives a property an energy efficiency rating from A (most efficient) to G (least efficient) and is required whenever a new building is constructed, or an existing building is sold or rented out. Therefore not all dwellings will have an EPC. The EPC ratings correspond to a range of SAP ratings from 1 – 100, with 100 being the best. The Standard Assessment Procedure (SAP) methodology works by assessing how much energy a dwelling will consume when delivering a defined level of comfort and service provision.

Number and percentage of Ashford’s private sector stock falling into each of the EPC ratings bands, SAP rating in brackets.

	Private Sector Stock		Private Rented Stock	
	Count	Percent	Count	Percent
(92-100) A	0	0.0%	0	0.0%
(81-91) B	135	0.3%	74	0.9%
(69-80) C	9,780	21.7%	2,894	33.9%
(55-68) D	20,317	45.1%	3,731	43.6%
(39-54) E	8,950	19.9%	1,214	14.2%
(21-38) F	4,471	9.9%	475	5.6%
(1-20) G	1,386	3.1%	161	1.9%

Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

In 2020 the proportion of households' fuel poor in Ashford was 8.7% (4527 households)³. This is measured in England using the Low Income Low Energy Efficiency (LILEE) method. The Ashford rate is lower than that for England (13.2%) and Kent (9.8%) but slightly higher than the South East average (8.6%).

Houses in multiple occupation (HMO) are where a property is rented out by at least 3 people who are not from 1 'household' (for example a family) but share facilities like the bathroom and kitchen.

In 2016 it was estimated there are 712 HMOs in the borough⁴. There are 164 licenced HMOs known to the council and recorded on the public register⁵. As a result of changes to the licencing of HMO's in 2018 it is estimated there over 100 unlicensed HMO properties in the borough.

Empty properties are potentially a wasted resource and considered long term empty if unoccupied for more than 6 months. Council tax records are used to determine the number of empty properties in the borough. Currently there are 323 registered properties considered long term empty of which 105 have been empty for more than 2 years.

There are five residential park home sites in the borough who have site rules lodged with the council. This covers a total of 400 park homes.

1.2 Challenges

The main challenges in ensuring the private sector housing stock is safe and well maintained are:

- Tackling irresponsible, rogue and criminal landlords in the private rented sector
- Bringing empty homes back into use
- Identifying and licencing homes in multiple occupation
- Ensuring disabled facilities grant funding matches increasing need
- Reducing number of households in fuel poverty
- Improving the energy efficiency of homes
- Implementing the forthcoming Renters Reform Bill

1.3 The Council's Role

The council has a number of statutory functions in relation to private sector housing. The main focus of our work is to ensure properties within the private sector are in a good state of repair, decent and safe to live in. There is a responsibility for investigating, maintaining, enforcing and improving housing standards and conditions.

We provide advice, assistance and enforcement with regard to:

- Empty properties
- Disabled facilities grants

³ <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2022>

⁴ BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

⁵ <https://www.ashford.gov.uk/housing/landlord-advice/houses-in-multiple-occupation/>

- Park Homes
- Unauthorised encampments
- Houses in multiple occupation
- Caravan sites
- Energy efficiency

The council's approach is to resolve problems and achieve the right outcomes at the earliest possible stage. When appropriate we will look to engage with other agencies such as Kent Fire and Rescue Service (KFRS), in order to rectify problems in a constructive manner. We will carry out our functions in an equitable, practical and consistent manner to secure a safe and healthy environment for all residents, in accordance with the National Concordat on Good Enforcement⁶.

Where possible an informal approach will be taken to resolve issues with landlords and tenants, through education, raising awareness, advice or signposting to other agencies. When enforcement action is necessary this will be taken in line with our Private Sector Housing Enforcement and Prosecution Policy⁷.

We will work to:

- Protect the health, safety and welfare of residents
- Improve management and conditions in the private rented sector
- Actively seek to reduce fuel poverty
- Assist disabled residents to access adaptations through our disabled facilities grants
- Bring empty properties back in to use
- Ensure mobile home sites (park homes) are safe and well managed
- Be transparent, consistent, fair and proportionate when taking enforcement action

2. Corporate Context

The Corporate Plan 2022 – 2024⁸ has an overarching ambition setting out the vision for the borough:

The Ashford Ambition - To be a thriving, productive and inclusive borough in 2030 and beyond; a vital part of Kent and the South East where local businesses, social enterprises, communities and the public sector provide collective leadership to promote shared prosperity, happiness and wellbeing.

Well maintained, safe and sustainable homes are central to achieving this ambition. Outcomes of the three themes of the Corporate Plan are supported by this strategy.

- Green Pioneer - Homes are energy efficient and cheaper to heat and renewable energy generation and consumption increases.
- Caring Ashford - Communities feel safe and secure and the lives of people with the worst health and well-being outcomes are improved.

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<https://webarchive.nationalarchives.gov.uk/ukgwa/20090609003228/http://www.berr.gov.uk/files/file10150.pdf>

⁷ <https://www.ashford.gov.uk/housing/landlord-advice/private-rented-sector/private-sector-housing-enforcement-and-prosecution-policy/>

⁸ <https://www.ashford.gov.uk/your-council/policies-and-strategies/corporate-plan-and-our-performance/>

- Targeted Growth - Our town centres are lively, safe places where people of all ages live, work and visit.

Reducing greenhouse gas emissions by improving the energy efficiency of housing in the borough is a key component of the council’s Carbon Neutral Strategy and Action Plan⁹ target to reach net zero carbon across the borough by 2050.

Priority 6	Outcomes
Reduce the environmental footprint of buildings through retrofitting existing buildings and improved building standards within new build developments	<ul style="list-style-type: none"> • Lower carbon footprint of buildings within the borough through new build regulation, private and public sector retrofit initiatives and use of renewable energy and heat networks where appropriate. • Increase net biodiversity where new building takes place. • Reduce fuel poverty.

Our overarching priorities for housing across the borough are:

1. Increase the supply of homes that are affordable to local households and meet local housing needs.
2. Promote and enable homes and neighbourhoods that reduce greenhouse gas emissions and contribute to enhancing the natural environment
3. Support housing initiatives that encourage independence, good health and community cohesion

This Private Sector Housing Strategy is one of a suite of housing strategies that supports achieving these overarching priorities.



⁹ <https://www.ashford.gov.uk/media/kbujmb2k/climate-change-strategy-and-climate-action-plan-june-2022-appendix-2-final.pdf>

3. Our Priorities for Private Sector Housing

The importance of good conditions in the private sector housing stock cannot be underestimated. Poor housing conditions can cause or aggravate a number of health related illnesses at a cost to other public services such as the NHS.

More people are seeking to rent a home as open market prices to purchase a home continue to rise and social housing is allocated to those most in housing need.

Meeting our carbon neutral targets and reducing fuel poverty are both reliant on improving energy efficiency in homes across the borough.

Bringing empty properties back in to use creates new homes and improves the local area where these homes may have fallen into disrepair.

Supporting resident's ability to remain living independently within their own homes through adaptations improves health and wellbeing.

Our priorities for private sector housing are:

- Safe and decent homes in the private rented sector
- Well maintained homes within Houses in Multiple Occupation
- Improving energy efficiency and reducing fuel poverty
- Empty homes brought back into use
- Well managed residential park home sites
- An efficient disabled facilities grant service

3.1 Priority 1: Safe and Decent Homes in the Private Rented Sector

The private rented sector is a housing option for those who are unable to afford to purchase a home on the open market, do not qualify for social housing or prefer the flexibility renting offers.

Market prices have risen across all property types in the last year. The affordability ratio is calculated on April 2022 prices and fulltime resident based earnings in 2021 (£598.30 per week)¹⁰.

Open market house prices to buy

Average house price	May 2021	April 2022	Percentage change	Affordability ratio
All property types	£319,321	£352,220	10.3%	11.3
Detached	£506,181	£568,760	12.4%	18.2
Semi-detached	£308,500	£341,468	10.7%	10.9
Terrace	£256,142	£277,916	8.5%	8.9
Flats and Maisonettes	£173,603	£187,506	8%	6.0

Source: Land Registry UK House Price Index

¹⁰ https://www.kent.gov.uk/__data/assets/pdf_file/0020/8183/earnings-in-kent.pdf

The Office for National Statistics (ONS) shows an increase of 3.1% for private rental prices in the South East over the 12 months to May 2022¹¹.

The private rent sector is increasing as more people turn to renting to find a place to live. Just over 4.4 million households live in the private rented sector, 19% of all households, compared to 14% in 2008-9¹². A snap shot of prices within a 5 mile radius of Ashford in June 2022 identified a selection of properties available for rent.

It is recommended that rent should not exceed approximately 35 - 45% of take home pay. For lower quartile earnings in Ashford (approximately £1520) this equates to £525 – £625 rent pcm¹².

Private rents

No. of bedrooms	Lowest £pcm	Highest £pcm	Number of properties
1 (house share)	450	550	2
1	675	1200	12
2	775	1100	42
3	1100	1950	15

Source: www.rightmove.co.uk/ on 27/6/2022

The majority of landlords and letting agents offering rented property in the Ashford area provide well managed accommodation that is properly maintained. However there are irresponsible, rogue and criminal landlords that let unsafe and unsuitable properties.

It is estimated that 893 private rented dwellings have category 1 HHSRS hazards, which is a hazard that is a serious and immediate risk to a person's health and safety. Under the Housing Act 2004 the council has a duty to respond to complaints and reports of poor housing, investigate and, where necessary, to take enforcement action to rectify the issue.

Tenants living in homes with damp or mould are at an increased risk of experiencing health problems and some people are more sensitive to mould than others, with some groups being especially vulnerable. The Private Sector Housing Department intends to ensure that those in the private rented sector including social tenants are supported appropriately in such cases while resolutions are found. We will investigate all complaints that are reported to us and ensure enquiries are taken very seriously.

Damp and mould will be assessed under the HHSRS and the council will follow the relevant guidance in deciding the level of action. Currently the HHSRS is currently under review by the government and the council awaits further guidance to strengthen our powers.

The table below shows the range of issues dealt with by the Private Sector Housing Team over the last 5 years.

Types of service requests received over the last 5 years

¹¹

<https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/indexofprivatehousingrentalprices/may2022>

¹² <https://www.halifax.co.uk/mortgages/help-and-advice/renters/how-much-rent-can-i-afford.html>

¹² <https://www.gov.uk/government/statistics/English-private-landlord-survey-2021-main-report.html>

Year	PSH General complaint- includes several issues	PSH Damp and mould growth only	PSH Electrical faults only	HMO Overcrowding cases	Housing Association general complaints for disrepair	PSH Harassment cases	HMO Fire precaution visits	HMO Amenities visits	PSH Overcrowding cases	PSH Disrepair various	PSH Unauthorised encampment
2017-18	122	7	0	7	0	0	20	19	3	18	11
2018-19	100	2	0	11	0	1	4	27	3	9	10
2019-20	86	9	0	13	0	0	6	41	0	10	6
2020-21	90	9	1	37	3	6	1	19	1	6	10
2021-22	89	6	22	22	13	3	2	30	1	10	4

In June 2022¹³ the government issued a white paper ‘A fairer private rented sector’. This sets out a long-term vision for a private rented sector (PRS) that is fit for the 21st century and delivers a better deal for tenants and underlines the government’s commitment, through the Renters Reform Bill¹⁴, to ensure all private landlords adhere to a legally binding standard on decency. This includes plans to:

- Abolish Section 21 ‘no-fault’ evictions and introduce a simpler tenancy structure
- Apply the Decent Homes Standard to the PRS for the first time
- Introduce a new Property Portal to help landlords understand their obligations
- Introduce a housing ombudsman covering all PRS landlords and providing redress for tenants

To create a fairer, more secure, and higher quality Private Rented Sector where:

- All tenants should have access to a good quality, safe and secure home
- All tenants should be able to treat their house as their home and be empowered to challenge poor practice
- All landlords should have information on how to comply with their responsibilities and be able to repossess their properties when necessary
- Landlords and tenants should be supported by a system that enables effective resolution of issues
- Local councils should have strong and effective enforcement tools to crack down on poor practice

¹³ <https://www.gov.uk/government/publications/a-fairer-private-rented-sector>

¹⁴ <https://www.gov.uk/government/news/government-to-deliver-new-deal-for-renters>

We welcome the proposed Renters Reform Bill to support better regulations within the private rented sector, leading to improved safety within tenant's homes. We anticipate that the PSH Team will be responsible for implementing parts of the Bill, most likely in relation to the Landlord National Register (landlord portal) and the Decent Home Standard. Having access to a landlord register would help to improve the rented sector by enabling us to target areas of poor housing and potentially identify rogue landlords. The Decent Home Standard, as currently in place for the social housing sector, would be applied to the private rented sector.

As the Bill passes through Parliament, it will set out and clarify the role of the local authority in implementing and enforcing the proposed regulations. We await government guidance on how it will be enforced and resourced to ensure we can proactively undertake these additional duties.

Currently the assistance the council offers to landlords and tenants includes:

Landlord Accreditation Scheme: Free landlord accreditation scheme offers financial help for improving energy efficiency through the ABC Energy Efficiency Grant for certain energy improvements. This includes replacing existing gas boilers up to £2,000 (all applications will be subject to available funding) and access to discounted professional training.

UK Entry Home Office Inspection: Available to those applying for a visa to prove to the Home Office that; the accommodation has been checked; a full home inspection has been carried out; there are the required number of rooms; there are no hazards present; there is a valid gas certificate.

Responding to complaints about disrepair and working with tenants and landlords to resolve issues informally or take enforcement action if needed.

Our key objectives to achieve Priority 1 are:

1.1 Engage with private sector landlords to promote good practice, required standards and changes to legislation

1.2 Address disrepair and poor housing conditions

1.3 Tackle the issue of rogue landlords

So local people can access homes in the PRS that are safe, well managed and suitable for their needs

3.2 Priority 2: Well-maintained Homes within Houses in Multiple Occupation

Houses in Multiple Occupation (HMO's) are often seen as problematic and poorly managed but they do provide a valuable source of accommodation for those unable to afford to buy or rent self-contained accommodation.

HMO's provide accommodation where some facilities, such as kitchen and bathroom maybe shared with tenants from another household. The licencing of HMOs was introduced in 2006 under the Housing Act 2004.

In 2018 the licencing requirements were amended and from then a licence is required from the local authority if all of the following apply:

- It is rented to 5 or more people who form more than 1 household
- Some or all tenants share toilet, bathroom or kitchen facilities
- At least 1 tenant pays rent (or their employer pays it for them)

Following the amendments to HMO licencing there was an influx of properties requiring a licence. A licence lasts for 5 years. Since the initial increase in licencing, following the amendments, the number of applications has declined with licences only being issued to newly converted HMO's or properties identified from proactive work.

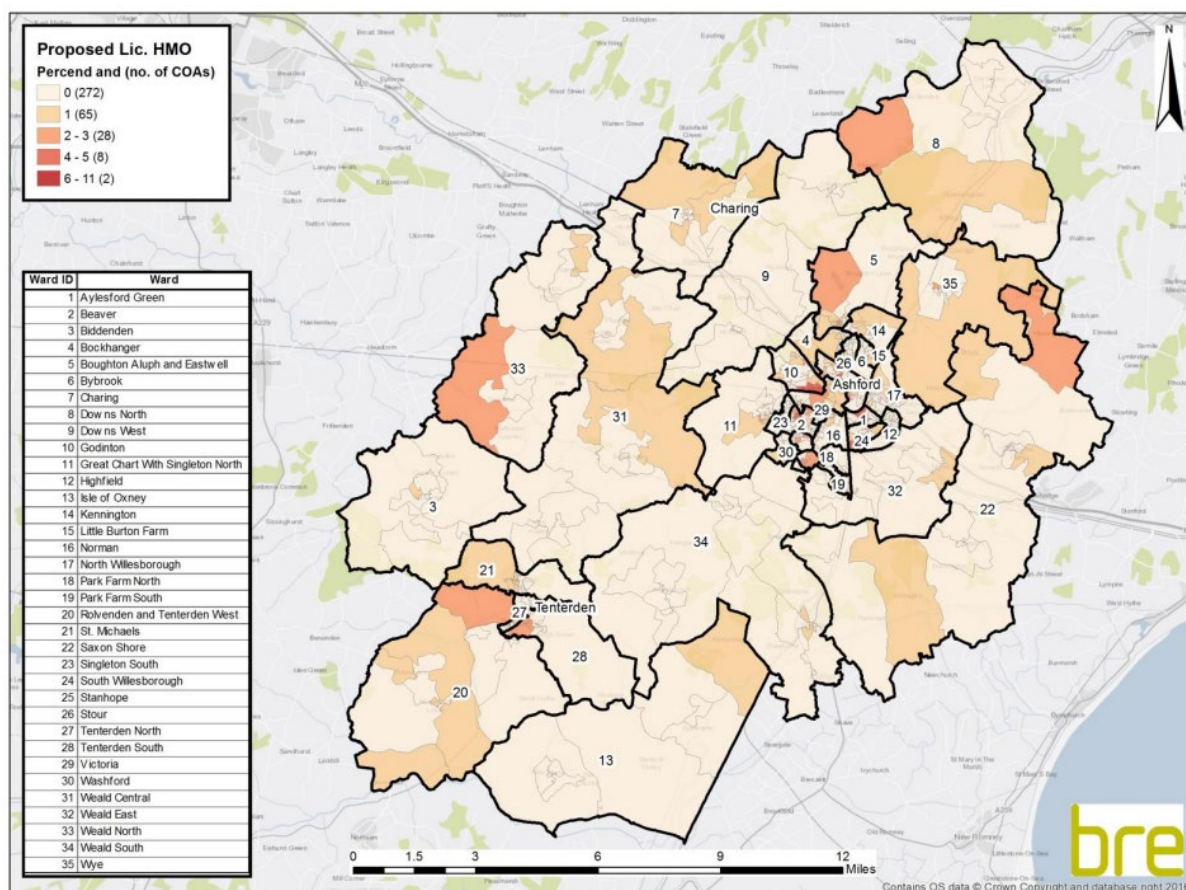
All HMO's must meet certain standards to ensure the health and safety of the occupants. Where an HMO is inspected and fails to meet the standards the council has a duty to act upon 'Category 1 Hazards' and the discretion to act if necessary for 'Category 2 Hazards'.

The type of property in Ashford, namely town houses, lend themselves to being ideal for HMO's. It is estimated that possibly there are in the region of 200 properties that could be HMOs in the borough. Some of these may be providing sub-standard accommodation. Identifying and inspecting such properties is ongoing.

During the 2 year period between 2019 and 2021, 52 possible HMO's were investigated resulting in the issuing of 8 licences. In the same period a total of 31 HMO licence applications were received, all were approved. Any issues relating to the management and/or condition of an HMO were resolved informally, preventing the need to take enforcement action.

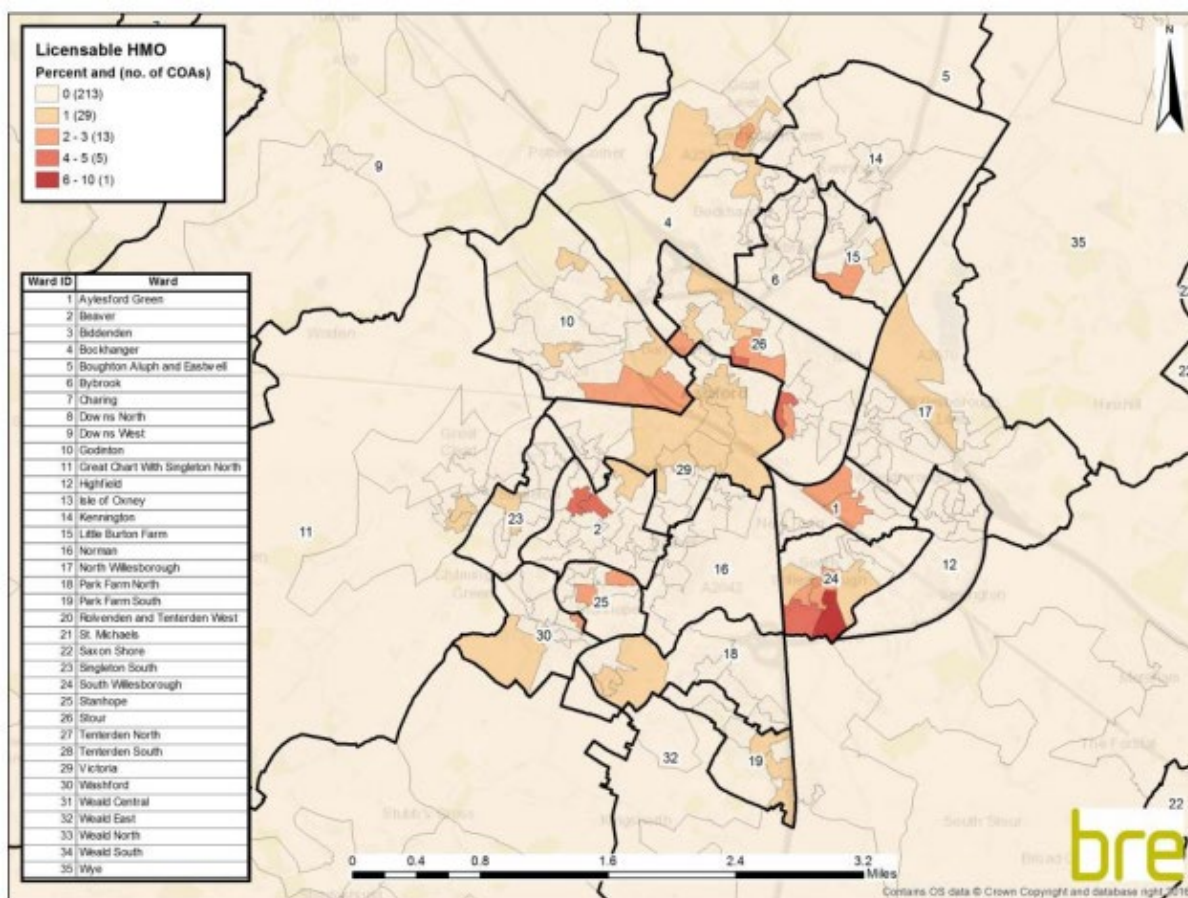
In 2021/22 there were 54 service requests specific to the management and/or condition of HMO's

Percentage of licensable HMOs under proposed definition based on private dwellings



Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

Ashford licensable HMOs – Ashford Urban Area



Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

HMO's and planning permission

In most cases planning permission will not be needed if:

The house is being lived in by members of a single household (basically a family) – No limit on number of members of the household.

Those living together as a single household and receiving care – Limit is no more than six people.

Those living together as a single household who do not fall within the definition of a house in multiple occupation – Limit is no more than six people.

House in multiple occupation (small HMO): Shared properties occupied between 3 and 6 unrelated individuals who share basic amenities – Limit is no more than six people

Planning permission will be required if:

There are more than six unrelated people in occupation or the dwelling is in an area covered by an Article 4 direction. An Article 4 Direction ¹⁵ limits the works that can be carried out without the need for planning permission. As a result in some areas, permitted development rights have been removed by making an Article 4 direction. From 1st December 2012 permitted development rights

¹⁵ <https://www.ashford.gov.uk/planning-and-development/do-i-need-planning-permission/planning-for-houses-in-multiple-occupation/>

were removed by way of an Article 4 Direction for the change of use from single dwellings to houses in multiple occupation (small HMO) in the wards shown below.

- Aylesford Green ward
- Beaver ward
- Little Burton Farm ward
- South Willesborough ward

Therefore, if such use commences after this date planning permission will be required.

In respect of HMO's the council currently carries out inspections, issues licences and provides advice to landlords as well as dealing with complaints of poor conditions from tenants.

[Our key objectives to achieve Priority 2 are:](#)

2.1 Promote high standards in licenced HMOs

2.2 Address disrepair, poor management and breaches of licence

2.3 Reduce the number of unlicensed HMOs in the borough

So HMO's offer a respected form of accommodation where tenants are treated fairly and landlords are compliant with the regulations

3.3 Priority 3: Improving Energy Efficiency and Reducing Fuel Poverty

Homes that are hard to heat are costly to run, emit unnecessary levels of greenhouse gases and where the occupier cannot afford the fuel bill may live in a cold damp home. This can lead to the occupier needing to make choices on how to budget for fuel, food and other essentials, reducing spend in one area to supplement another, which is detrimental to health and wellbeing.

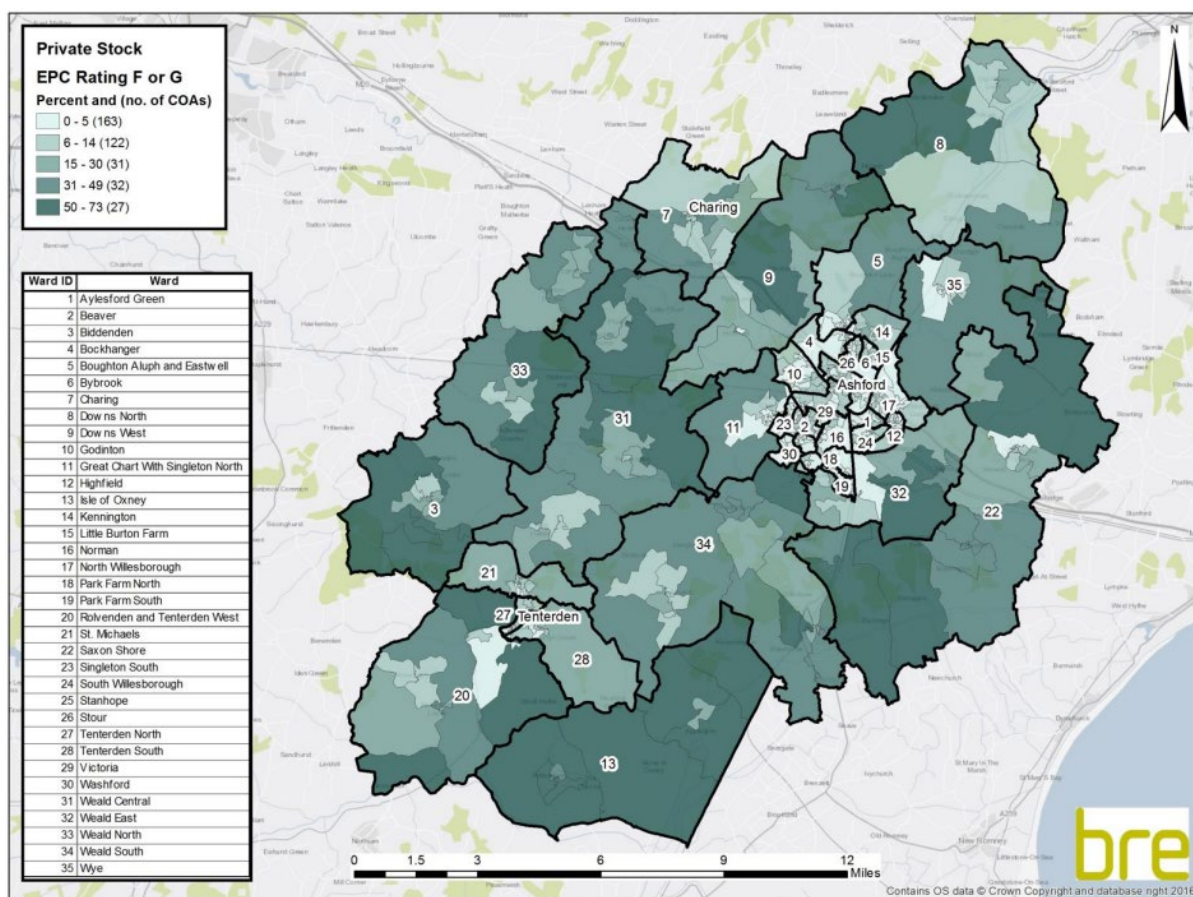
Improving the energy efficiency of homes either reduces the amount of fuel required or the home can be heated to a more adequate temperature for the same amount or less fuel.

The average Simple SAP rating for all private sector dwellings in Ashford is 57, which is the same as England but worse than South East (58). For owner occupied stock the figure is 56 and for private rented stock it is 62.

A proportion of private sector stock in Ashford could benefit from energy efficiency improvements with an estimated 11,509 dwellings (26%) having un-insulated cavity walls. Furthermore, there are an estimated 6,411 dwellings (14% of Ashford's private sector stock) which have less than 100mm of loft insulation with 2,182 (5%) having no loft insulation at all.

5,857 (3.0%) of private sector dwellings and 636 (7.4%) of private rented dwellings in Ashford are estimated to have an EPC rating below band E. From April 2020 landlords will not be permitted to rent properties if the EPC rating falls below band E. It is the local authorities' duty to ensure adherence to this requirement.

Distribution of dwellings with F or G EPC ratings in the private rented stock



Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

The council can assist in improving energy efficiency of private sector homes through signposting to a range of national schemes. For example the links below are for organisations that provide advice on energy efficiency and grants:

- Energy saving Trust – <https://energysavingtrust.org.uk>
- Simple energy advice - www.simpleenergyadvice.org.uk
- Green Doctors – www.groundwork.org.uk

From 2020, fuel poverty in England is measured using the Low Income Low Energy Efficiency (LILEE) indicator. Under this indicator, a household is considered to be fuel poor if:

They are living in a property with a fuel poverty energy efficiency rating of band D or below and when they spend the required amount to heat their home, they are left with a residual income below the official poverty line.

There are 3 important elements in determining whether a household is fuel poor:

- household income
- household energy requirements
- fuel prices

Previously, from 2013, the Low Income High Costs (LIHC) definition was used in England to determine fuel poverty. Whereby households were considered fuel poor if:

- They have required fuel costs that are above the median level (High Cost); and
- Were they to spend that amount they would be left with a residual income below the official poverty line (Low Income).

The highest concentrations of fuel poverty (Low Income High Costs definition) in the private sector are found in the wards of Norman, Aylesford Green and Victoria and for excess cold the highest concentrations are in Isle of Oxney, Biddenden and Downs West¹⁶.

In addition to signposting residents to regional and national energy efficiency schemes and websites such as Kent Solar Together and Governments Boiler upgrade scheme and Sustainable Warmth grants scheme, the council offers the following assistance to landlords, tenants and owner occupiers:

Up to £2000 towards energy efficiency improvements for landlords joining the Ashford Landlord Accreditation Scheme.

Winter Warmth Grants for older and vulnerable households to improve heating and insulation in their homes. The maximum grant funding available is £4,000, but in exceptional circumstances and with the agreement of the Private Sector Housing Manager a larger grant may be awarded.

Referrals to the Energy Company Obligation (ECO) funding for eligible households living in fuel poverty, on low incomes and vulnerable to the cold, for insulation upgrades and new heating systems.

Our key objectives to achieve Priority 3 are:

3.1 Reduce number of fuel poor households in the borough

3.2 Increase take up of energy efficiency measures in the private sector

So private sector housing contributes to reducing the borough's carbon footprint through improved energy efficiency and homes are cheaper and easier to heat.

3.4 Priority 4: Empty Homes brought back into use

Most empty properties in the borough are privately owned. Across the borough there are 323 properties that have been empty for more than 6 months of which 105 are empty and unfurnished for more than 2 years. With housing in short supply they are a wasted resource and can have a detrimental effect on neighbourhoods and the local environment. The council has a range of powers from informal advice and encouragement through to enforcement action to bring empty properties back into use. Currently there are negotiations with owners of 10 long term empty properties.

There are a number of reasons why a property maybe empty:

- Property owned by a company or organisation which they have no current plans to address

¹⁶ Source: BRE Integrated Dwelling Level Housing Stock Modelling and Database for Ashford Borough Council, 2017

- Properties due to be renovated or going through probate
- Unresolved ownership usually following the death of the owner
- Owner may be institutionalised - hospital, prison etc.
- Poor property condition where costs of bringing it back into use are high
- Properties deliberately being kept empty by disreputable landlord operating in the borough

The focus is on empty properties which blight a neighbourhood and are subject to vandalism. Often these are in isolated areas or a standalone property in a street or road and are subject to complaints, debts (council tax arrears) or are in a poor condition.

Before any enforcement action can be taken it is necessary to demonstrate that an informal approach to engaging the owner to make use of their property has been taken. This includes identifying and then informing the owners of options such as:

- Interest free loans of up to £30,000 from the No Use Empty¹⁷ initiative
- The ABC lettings¹⁸ scheme whereby a property can be managed to generate rentable income

Identifying the owner of an empty property can be time consuming and the level of grant available often falls short of the cost of refurbishment.

Our key objectives to achieve Priority 4 are:

4.1 Encourage long-term empty homes back into use

4.2 Reduce number of problematic long-term homes properties

So problematic long term empty homes are brought back in to use providing much needed accommodation and improving neighbourhoods

3.5 Priority 5: Well Managed Residential Park Home Sites

The council is obliged under the Caravan Sites and Control of Development Act 1960 – Duty on Local Authorities to licence all privately owned residential caravan sites including park home sites and holiday sites. This is to ensure they are fit for purpose. The Mobile Homes Act 2013 introduced additional measures to improve standards and enforcement options. This means that the local authorities will be able to charge fees for issuing, transferring, or altering conditions in a site licence. Authorities will also be able to charge fees for the administration and monitoring of site licences. Where a local authority considers that a park owner is failing or has failed to comply with a site licence condition it can serve a compliance notice on the park owner listing the steps that need to be taken, within a specified time period, to comply with the requirements of the site licence.

The majority of park homes in Ashford are well managed and well maintained. The council has assisted park owners to improve their sites and will continue to work with site owners to ensure their sites are maintained and resident's rights are protected.

¹⁷ <https://www.no-use-empty.org.uk/>

¹⁸ <https://www.ashford.gov.uk/housing/abc-lettings/>

Our key objective to achieve Priority 5 is:

5.1 Ensure Park Home sites operate according to their licence

So site licence conditions are adhered to and residents are confident to raise concerns with the operator which are given due consideration.

3.6 Priority 6: An Efficient Disabled Facilities Grant Service

To assist people with disabilities to remain living at home and retain their independence and safety, the requests for Disabled Facilities Grants (DFGs) to install adaptations in the home are likely to increase.

Number of DFG applications received over the last 5 years:

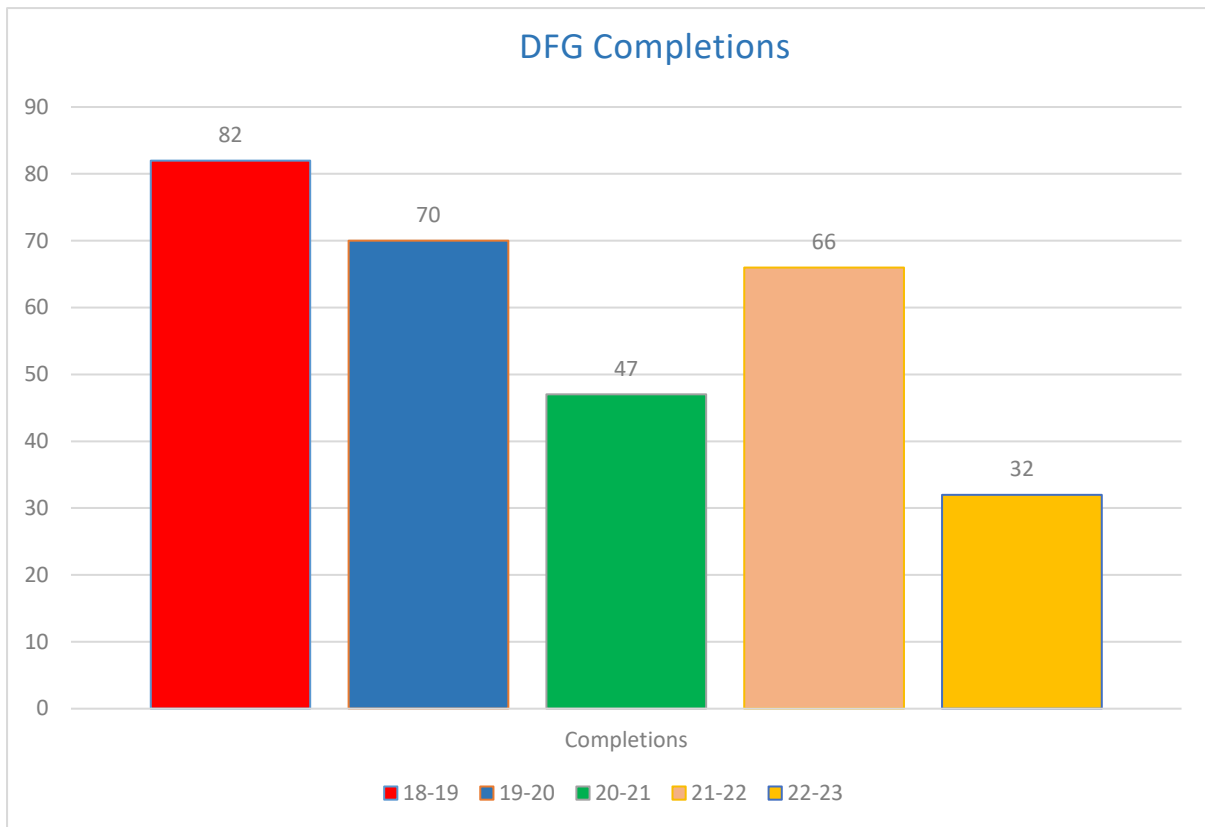
Applications received	Year
96	2017-18
142	2018 -19
111	2019-20
88	2020-21
141	2021-22

The council has a statutory duty in relation to mandatory DFGs for essential adaptations to allow disabled people to continue to live within their own homes. The maximum mandatory grant is set at £30,000, which is decided by a means test (except in the case of children under the age of 19), based on income and capital. In some instances applicants may have to pay a contribution towards their adaptations. There is currently additional discretionary funding available through the Better Care Fund which provides:

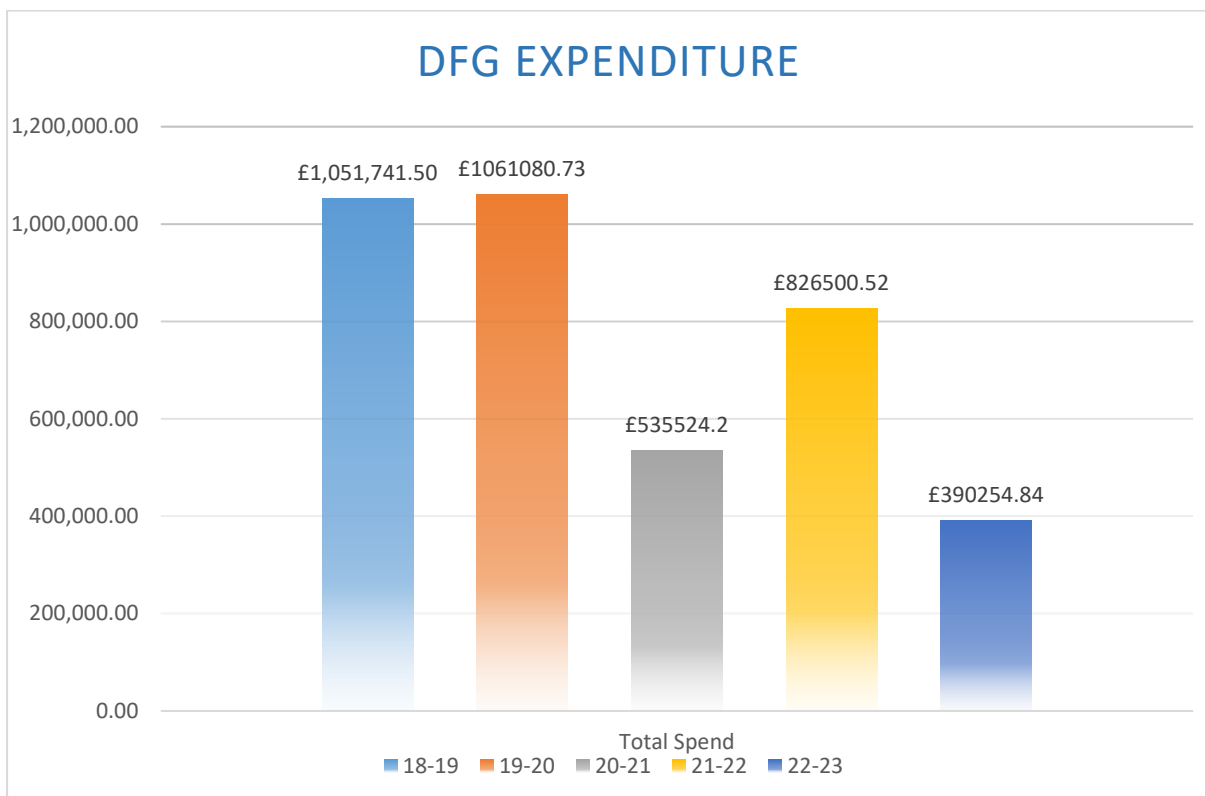
- £10,000 top up on existing mandatory DFG limit of £30,000. Total amount £40,000.
- Provide a more generous means test, discounting the first £10,000
- No means test for grants for stair lifts up to £5,000 under the hospital discharge scheme
- Boiler replacements for vulnerable and elderly residents.

Ashford Borough Council uses the services of the Home Improvement Agency (Town and Country Housing) to manage our DFG referrals. This service will include, liaising with all applicants when filling out applications to project managing the works. Grant applicants can use the services of other agencies if they so wish.

The chart below shows the number of completed DFG schemes over the last 5 years. 2020/21 was impacted by the coronavirus pandemic restricting access to homes to undertake works.

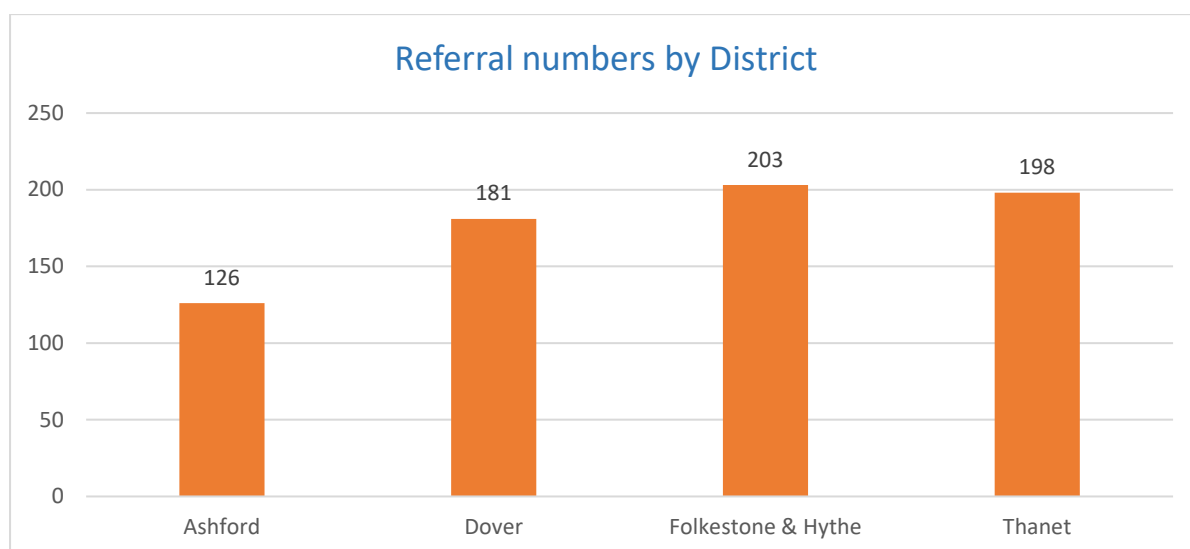
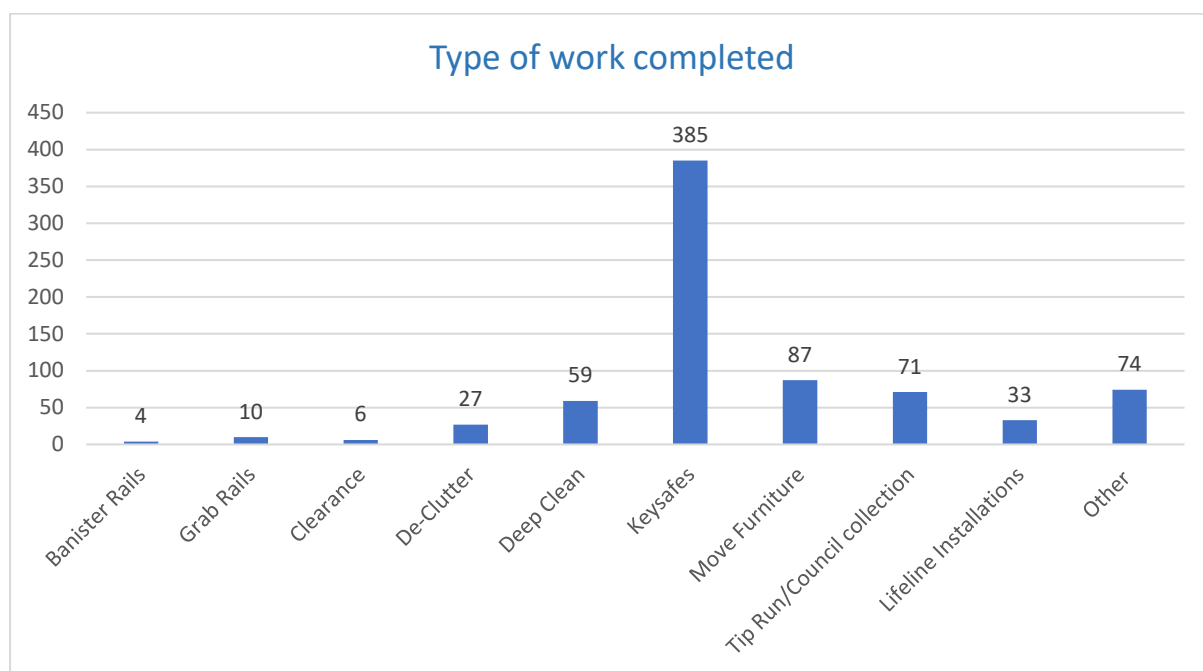


Corresponding spend is illustrated in the chart below



The council part funds a hospital care coordinator at the William Harvey Hospital to assist in reducing bed-blocking. The scheme focuses on providing care in the community, which provides a significant opportunity to free up hospital beds. Five local authorities across East Kent, are currently taking part in the scheme, for which Ashford Council part funds with Dover District Council.

The charts below showing the type of adaptations carried out in resident’s homes under the scheme for April 21- March 22 and referrals for each local authority:



Our key objectives to achieve Priority 6 are:

6.1 Support disabled residents to live independently at home

6.2 Maximise funding available for DFGs

So disabled residents are assisted to live independent lives in their own homes through timely and appropriate adaptations

4. Resources and Funding

4.1 The Private Sector Housing Team

The Private Sector Housing (PSH) team is one of the smallest teams in Kent, with 2.1 fulltime equivalents. This means that reactive works such as dealing with complaints, enforcement action and our mandatory functions takes priority. Therefore the capacity to undertake proactive work to identify unlicensed HMO's, establish ownership of empty properties and increase energy efficiency in the private sector is limited.

Listed below are the services we currently provide within PSH.

- Dealing with unauthorised encampments
- Park homes licensing and monitoring of site licence conditions
- Disabled facilities grants
- Energy efficiency grants
- Complaints within the private rented sector.
- Enforcement of MEES & Electrical Safety Standards
- Liaising with external agencies
- UK Entry inspections
- Empty properties – monitoring and working to bring them back into use.
- Undertaking reports and statistics for government

4.2 Funding and Income

Revenue to support the functions of the PSH team come from a variety of sources. Some sources of funding are dependent on the number of inspections/licences completed or issued so can fluctuate from year to year. Income for 2021/22 is shown in the table below.

Income for 2021/22

Funding Source	Private rented/Owner	HMOs	Energy efficiency	Park Homes	DFGs
UK Entry Home Office Inspections	£1,488				
Government Funding /Sustainable Warmth Scheme			£1.6M		
Better Care Fund					£893,572.00
ABC General Fund					£90,000
HMO licencing Fees		£6,764.52			
Park Home Pitch Fees				£1,868.10	

UK Entry Home Office Inspections: The council undertake inspections and provide reports for those applying for visas from Commonwealth Nations to live or stay in the UK to ensure accommodation is free from serious hazards. The fee for an inspection 2021/22 was £120. The fee increase each year in line with inflation, for 2022/23 is £124. Alternatively, other private companies can provide similar visa/immigration inspection reports and further details can be found on the internet.

Regional Housing Board Winter Warm Grants: This funding is recycled through a local land charge being put on the grant, to help assist others in the future.

Better Care Fund: Since April 2015, central government funding for DFGs has been provided through the Better Care Fund (BCF). This funding is allocated to upper-tier authorities with part of the allocation being ring-fenced for the provisions of DFGs which in turn is passed on to district and borough councils. The Better Care Fund is due for review by government and any decrease in funding would seriously impact the ability to meet the demand for DFG's.

ABC General Fund: The council budgets to provide additional funding to enhance the DFG service.

HMO licencing: The current fee for licencing a new HMO or renewal after 5 years is £802.00. Following the introduction of licencing in 2006 and the amendments in 2018 we can predict where there are likely to be peaks of renewals.

Year	renewal 21/22	renewal 22/23	renewal 23/24	renewal 24/23
Number	12	44	49	18
Income	£6,764.52	£24,803.24	£27,621.79	£10,146.78

Park Home Pitch Fees: The council can use its discretion whether to charge for all or any aspect of the site licencing. Currently the annual licencing fee applies only to commercial sites and covers part of the cost of monitoring park homes in the borough. The fee is calculated on a price per unit based

on the total cost of carrying out our licensing functions for our sites divided equally by the total number of units over all our relevant protected sites (10 or more units).

5. Governance and Monitoring

The disabled facilities grants scheme is monitored through key performance indicators which are regularly updated with a number of DFGs completed and the amount of DFG budget spent.

In addition to our DFG grants monitoring, Private Sector Housing provides a number of performance indicators for both the Housing Department and Corporate KPIs, including a number of enforcement notices, request for services and a number of new licensed HMOs. These indicators are provided on a monthly basis and will become part of the strategy.

The action plan which forms part of the strategy sets out a number of targets which will be monitored and reviewed on a yearly basis to ensure the strategy is current and targets are achievable.

Progress is reported to the Assistant Director for Housing and the Portfolio Holder for Housing.

6. Action Plan

Objective	Action	Partners	Timescale	Resources	Target
Priority 1: Safe and Decent Homes in the Private Rented Sector					
<i>Outcome: Local people can access homes in the PRS that are safe, well managed and suitable for their needs</i>					
1.1 Engage with private sector landlords to promote good practice, required standards and changes to legislation	a) Hold a yearly landlord forum	National Residential Landlords Association	September/October each year	Officer time	<ul style="list-style-type: none"> • 1 forum per year • 2 new landlords accepted on to accreditation scheme each year
	b) Update webpages with any legislative changes		As necessary	Officer time	
	c) Review and publicise the landlord accreditation scheme	Communications Team	By end of 2023	Officer time	
1.2 Address disrepair and poor housing conditions	a) Investigate complaints and take appropriate action	KFRS	On-going	Officer time	<ul style="list-style-type: none"> • Issue 8 enforcement notices under the Housing Act 2004 per year • Issue 10 enforcement notices to improve electrical safety. • Reduce the number of MEES non-compliant dwellings
	b) Ensure electrical safety standards are being met	Housing Options Team ABC Lettings KFRS	On-going	Officer time	
	c) Ensure the requirements of the Domestic Minimum Energy Efficiency Standards MEES are met	KEEP	On-going	Officer time	
1.3 Tackle the issue of rogue landlords	a) Investigate and take action where illegal evictions are attempted	Legal Services Citizens Advice	On-going	Officer time	<ul style="list-style-type: none"> • Where appropriate bring a case to court within 6 months
	b) Use the national database to identify and report rogue landlords		On-going	Officer time	

Priority 2: Well-maintained Homes within Houses in Multiple Occupation					
<i>Outcome: HMO's offer a respected form of accommodation where tenants are treated fairly and landlords are compliant with the regulations</i>					
2.1 Promote high standards in licenced HMOs	a) Provide advice and guidance to HMO landlords	Communications Team National Landlords Association	On-going	Officer time	<ul style="list-style-type: none"> • Write to 20 known landlords • Review information on website quarterly
2.2 Address disrepair, poor management and breaches of licence	a) Investigate complaints and take appropriate action	Fraud Investigation Service Community Safety Unit Police	On-going	Officer time	<ul style="list-style-type: none"> • Proactively inspect between 50-100 properties per year
	b) Work in partnership with other agencies to identify and resolve hazards in HMOs	KFRS	On-going	Officer time	
2.3 Reduce the number of unlicensed HMOs in the borough	a) Undertake proactive work to identify unlicensed HMOs		On-going	Officer time	<ul style="list-style-type: none"> • Identify up to 10 unlicensed HMOs each year
	b) Keep an up to date public register of HMOs		Quarterly	Officer time	
	c) Promote benefits of using a licenced HMO through ABC media	Communications Team	Yearly promotion	Officer time	
Priority 3: Improving Energy Efficiency and Reducing Fuel Poverty					
<i>Outcome: Private sector housing contributes to reducing the boroughs carbon footprint through improved energy efficiency and homes are cheaper and easier to heat.</i>					
3.1 Reduce number of fuel poor households in the borough	a) Work in partnership to identify and promote schemes and funding opportunities	KEEP Communications Team	On-going as determined by funding streams	Government funding KCC Funding	<ul style="list-style-type: none"> • Identify between 30 - 60 homes deemed to be fuel poor.
	b) Undertake awareness raising campaign about help available aimed at fuel poor households	Climate Change Team Communications Team KEEP	On-going with focus in conjunction with other events such as Big Green Week	Officer time	

3.2 Increase take up of energy efficiency measures in the private sector	a) Promote and signpost households to energy efficiency schemes	KEEP Climate Change Team Communications Team	On-going with focus in conjunction with other events such as Big Green Week	Government funding Officer time	<ul style="list-style-type: none"> • Improve 10-20 properties • Run 2 targetted campaigns each year
	b) Use C-Path tool for targeted campaigns		On-going within Sustainable Warmth programme	Officer time	
	c) In private rented sector target improvements at F&G rated properties under MEES regulations	National Landlord Association KEEP	On-going	Officer time	
Priority 4: Empty Homes brought back into use					
<i>Outcome: Problematic long term empty homes are brought back in to use providing much needed accommodation and improving neighbourhoods.</i>					
4.1 Encourage long-term empty homes back into use	a) Promote options available to owners through ABC media and targeted campaigns	KCC - No Use Empty Communications team	On-going	Officer time	<ul style="list-style-type: none"> • Assist in returning up to 3 long term empty properties into use per year
4.2 Reduce number of problematic long-term homes properties	a) Take a proactive approach to identifying the owners of problematic homes properties	KCC - No use-empty	On-going	Officer time	<ul style="list-style-type: none"> • Maintain a rolling programme of 10 problematic empty homes in negotiation
	b) Work with the owners to find suitable options to bring homes back in to use	KCC – No Use Empty	On-going	Officer time	
	c) Where necessary take enforcement action against owners of problematic long-term empty homes	KCC – No Use Empty Legal Services	On-going	Officer time	
Priority 5: Well Managed Residential Park Home Sites					
<i>Outcome: Site licence conditions are adhered to and residents are confident to raise concerns with the operator which are given due consideration.</i>					

5.1 Ensure Park Home sites operate according to their licence	a) Respond to resident complaints and take necessary action	KRFS	On-going	Officer time	<ul style="list-style-type: none"> Undertake one site inspection per year per commercial site
	b) Ensure compliance with site licence conditions and serve compliance notice if required	Legal Services	On-going	Officer time	
Priority 6: An Efficient Disabled Facilities Grant Service					
<i>Outcome: Disabled residents are assisted to live independent lives in their own homes through timely and appropriate adaptations</i>					
6.1 Support disabled residents to live independently at home	a) Promote the DFG service	HIA KCC (OT service)	On-going	Officer time	<ul style="list-style-type: none"> Average time taken from referral to completion 6 months or less Deal with 50 hospital referrals
	b) Work in partnership with other agencies to assess referrals and deliver adaptations	KCC (OT service) HIA	On-going	Officer time	
	c) Continue to part fund the hospital care coordinator	William Harvey Hospital Dover DC	Next review April 2023	Officer time	
6.2 Maximise funding available for DFGs	a) Make most effective use of Better Care Fund resources	KCC HIA	On-going	Officer time	<ul style="list-style-type: none"> Ensure at least 85% of the DFG budget is spent per year Complete 70 DFGs per year
	b) Continue to provide additional funding from ABC resources	Finance Team	Review in line with annual budget setting process	Officer time	

7. Glossary

BRE	Building Research Establishment - centre of building science in the United Kingdom, owned by charitable organisation the BRE Trust.
Carbon Neutral	Balancing emissions of carbon dioxide with its removal.
DFG	Disabled Facilities Grant.
EPC	Energy Performance Certificate - tells how energy efficient a building is and gives it a rating from A, very efficient, to G, inefficient.
Greenhouse Gases	Greenhouse gases trap heat in the atmosphere and warm the planet. The main greenhouse gases are; water vapour (H ₂ O), carbon dioxide (CO ₂), nitrous oxide (N ₂ O), methane (CH ₄) and ozone (O ₃).
HHSRS	Housing health and safety rating system - a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.
HIA	Home Improvement Agency - local not-for-profit organisations located throughout the country and they assist elderly people to improve, repair, maintain, or adapt their home.
HMO	House in Multiple Occupation - residential properties where 'common areas' exist and are shared by more than one household.
KCC	Kent County Council.
KEEP	Kent Energy Efficiency Partnership
KFRS	Kent Fire and Rescue Service.
LIHC	Low Income High Costs Definition of Fuel Poverty - households are defined as being low income (LI) if their remaining income after expenditure on fuel costs is then less than 60% of the median income after housing costs (AHC).
LILEE	Low Income Low Energy Efficiency indicator of fuel poverty - a household is considered to be fuel poor if they have a fuel poverty energy efficiency rating of band D or below and if they were to spend their modelled energy costs, they would be left with a residual income below the official poverty line.
NHS	National Health Service.
SAP	Standard Assessment Procedure - SAP ratings show the energy performance of a property on a scale of 1 to 100. Calculations are made based on the size, shape and physical characteristics of a house (including insulation levels) to calculate the rate of heat loss through walls, roofs, windows, doors and floors.
PRS	Private Rented Sector.
PSH	Private Sector Housing.

Appendix 2

Equality Impact Assessment

Lead officer:	Julian Watts Private Sector Housing Manager
Decision maker:	Cabinet
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	To adopt – Private Sector Housing Strategy
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	15 December 2022
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	<p>Poor housing conditions can have a serious negative impact on both the physical, mental and wellbeing of its occupants. Currently the Council does not have a Private Sector Housing Strategy. The proposed Strategy intends to outline the Council's approach to ensuring that residents across our borough live in homes that are safe, well maintained and meet required standards</p> <p>Adopting the strategy will play an important part in how the council engages with the private sector in addressing energy efficiency within homes and reducing the use of fossil fuels, which is a key component in achieving our carbon neutral targets.</p> <p>The proposed Private Sector Housing Strategy sets out how we intend to meet challenges and opportunities confronting the service and set out key priorities. Whilst housing conditions in Ashford are generally good, there are landlords who are failing to meet their obligations. The private rented sector provides a valuable component of our overall housing stock. The strategy will not just focus on improving housing standards by improving living conditions, but also include a range of services to improve people's wellbeing. The private sector team is committed to improving housing conditions across all tenures.</p>
Information and research:	

<ul style="list-style-type: none"> Outline the information and research that has informed the decision. Include sources and key findings. 	<p>The Strategy is a combination of existing services brought together in one document setting out how we intend to meet challenges going forward.</p>
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<p>Consultation:</p> <ul style="list-style-type: none"> What specific consultation has occurred on this decision? What were the results of the consultation? Did the consultation analysis reveal any difference in views across the protected characteristics? What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>Consultation process included relevant Managers within Housing , including the Portfolio Holder (Cllr. Buchanan) and Legal Services (Samantha Clarke)</p>
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Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	Low	Positive (Minor)
Middle age	Low	Positive (Minor)
Young adult	Low	Positive (Minor)
Children	Low	Positive (Minor)
<u>DISABILITY</u> Physical	Medium	Positive (Minor)
Mental	Low	Neutral
Sensory	Low	Neutral
<u>GENDER RE-ASSIGNMENT</u>	None	Neutral

<u>MARRIAGE/CIVIL PARTNERSHIP</u>	None	Neutral
<u>PREGNANCY/MATERNITY</u>	None	Neutral
<u>RACE</u>	None	Neutral
<u>RELIGION OR BELIEF</u>	None	Neutral
<u>SEX</u> Men	None	Neutral
Women	None	Neutral
<u>SEXUAL ORIENTATION</u>	None	Neutral

Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	
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Is the decision relevant to the aims of the equality duty?	
Guidance on the aims can be found in the EHRC's Essential Guide , alongside fuller PSED Technical Guidance .	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	N/A
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	N/A
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	N/A

Conclusion:	
<ul style="list-style-type: none"> Consider how due regard has been had to the equality duty, from start to finish. There should be no unlawful discrimination arising from the decision (see guidance above). Advise on whether the proposal meets the aims of 	<p>Adopting the PSH strategy will not have any potential for discrimination or adverse impact for people living within the borough.</p> <p>No unlawful discrimination will result from implementing the strategy.</p> <p>The strategy meets the aims of the equality duty and no adjustments are required.</p>

<p>the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified.</p> <ul style="list-style-type: none"> • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported? 	<p>The action plan set out in the strategy will be reviewed ensure it meets current objectives. A review may also be required in light of any new legislation or any changes in the council's policy.</p> <p>The overall Strategy will be reviewed every five years</p>
<p>EIA completion date:</p>	<p>18/11/22</p>