

Let's Talk: Housing Standards Consultation

- Draft Financial Assistance and Enforcement Policy

Analysis report — December 2020

Introduction

The council's Housing team have drafted a new Financial Assistance and Enforcement Policy, which outlines how the council can help residents and landlords in the district to maintain and improve the condition of their properties. The policy also sets out details of the statutory powers our Housing Standards team can use to take action against landlords who fail to provide acceptable homes for their tenants.

Chichester District residents, community groups, landlords, letting agents, and other relevant stakeholders, were invited to share their views on the draft policy and its proposals in a public consultation.

Executive Summary

- **83 responses** were received for the survey, which was live from 6 November to 4 December 2020.
- The majority of respondents were **residents** of the district (**79**), and most (**41.5%** or 34) live in **Chichester City**.
- Most respondents were aged over 65 (**45.8%** or 38), and more respondents were female (**55.4%** or 46) than male (**43.4%** or 36).
- Most respondents told us they **strongly agreed** or **agreed** with the draft policy's main proposals, as follows:
 - 1) Proposal to **expand the Chichester Warm Homes Initiative** to tackle excess cold and fuel poverty: **48.2%** strongly agreed and **36.1%** agreed.
 - 2) Proposal to **continue the Chichester Landlord Accreditation scheme** to help improve the standard of rented properties: **59.3%** strongly agreed and **25.9%** agreed.
 - 3) **Increase financial support for eligible homeowners** to help with essential property repairs: **48.2%** strongly agreed and **38.6%** agreed.
 - 4) Council's **enforcement policy**: **61%** strongly agreed and **31.7%** agreed
- **167** individual comments were received, including feedback on the Disabled Facilities Grants scheme, and these have been given to the service area for analysis.

Methodology

To understand people's thoughts on the draft policy, an online survey was created. This enabled respondents to comment specifically on some of the key proposals, as well as give their views on the policy as a whole. Paper copies of the survey were available on request.

To help people get involved in the consultation, a range of Frequently Asked Questions were developed and included on the consultation web page to provide background, context and a glossary of terms used. Here, respondents could also find a link to the survey in which they could share their views on the policy. They could also view the findings of the housing stock condition survey, which informed the draft policy.

83 responses were received for this survey, which was live between 6 November and 4 December 2020.

Branding for the consultation — 'Let's Talk: Housing Standards' — was created and used to promote the consultation in a variety of ways, including:

- Promotional posters given to council partners, such as parish, town and the city council.
- Social media platforms, such as Facebook, Twitter, Nextdoor, LinkedIn and Instagram, were used to promote the consultation and invite people to take part (a full social media reach breakdown is included in Appendix A).
- On the council's website, a campaign banner was developed for the homepage and an advertising banner was displayed at the top of each web page.
- 703 Let's Talk Panel members, who have all signed up for consultation updates, were notified of the consultation and given details on how to participate.
- A media release was distributed to announce the start of the consultation and another reminder release was sent out nearer the consultation deadline.
- The consultation was promoted in the council's general email newsletter, Sussex Police's Neighbourhood Watch bulletins for the area, and in West Sussex County Council's Your Voice consultation newsletter.

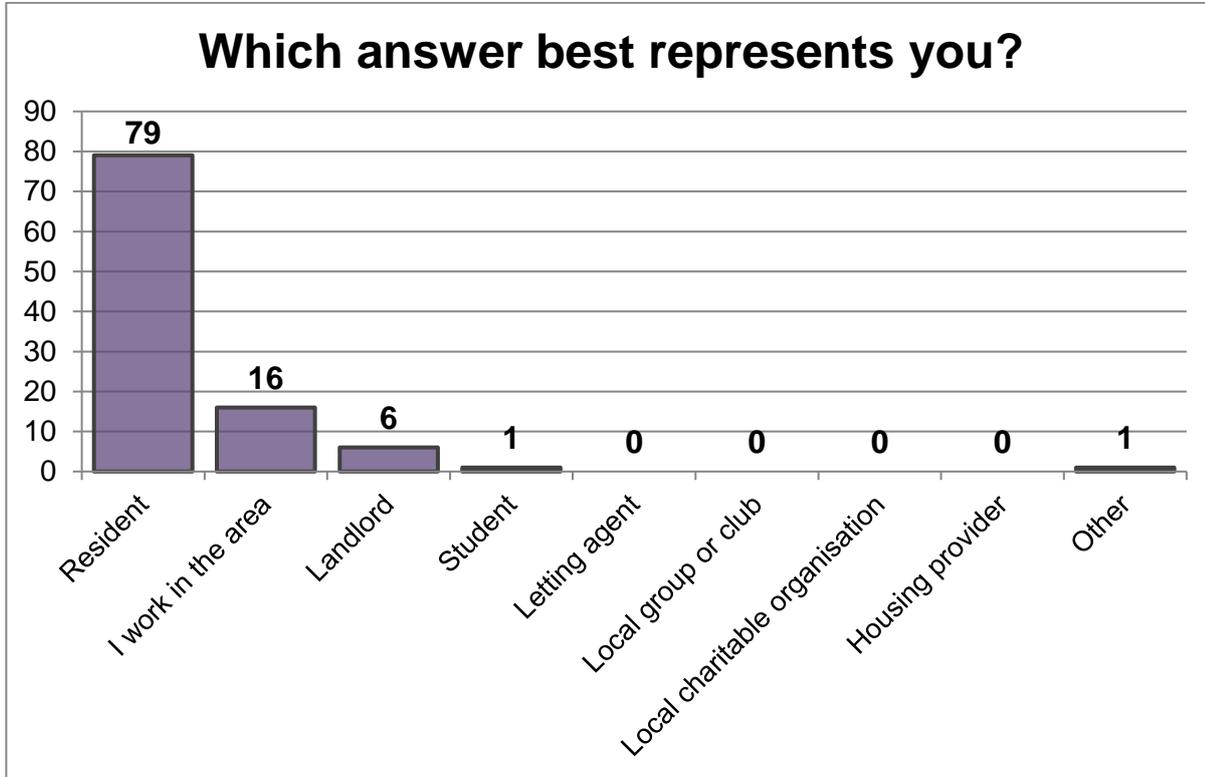
A full list of promotions is available in Appendix B.

30 respondents joined the Let's Talk Panel at the end of the survey, and 29 subscribed to the council's email newsletter.

Section One: Respondent Profile

Respondents were asked to select which answer best represents them from a list of options. The majority of respondents (**79**) told us they are district residents.

The graph below breaks down the full results. As respondents could select more than one choice, percentages have not been included.



1 respondent selected 'Other' and specified: 'Town planner with interest in housing issues. Lead on developing neighbourhood plan'

Of those who live in the district, **41.5%** (34 respondents) said they live in Chichester City. The table below shows the number and percentage of respondents from different areas across the district, from the most responses to the least.

Which area of the Chichester District do you live in?		
Area	Percent	Count
Chichester City	41.5%	34
The Witterings	13.4%	11
Selsey	6.1%	5
Funtington	3.7%	3
Fishbourne	2.4%	2
Midhurst	2.4%	2
Harting	2.4%	2
Sidlesham	2.4%	2
Tangmere	2.4%	2
Birdham	1.2%	1
Lavant	1.2%	1

Chidham and Hambrook	1.2%	1
Donnington	1.2%	1
Easebourne	1.2%	1
North Mundham	1.2%	1
Oving	1.2%	1
Westhampnett	1.2%	1
Wisborough Green	1.2%	1

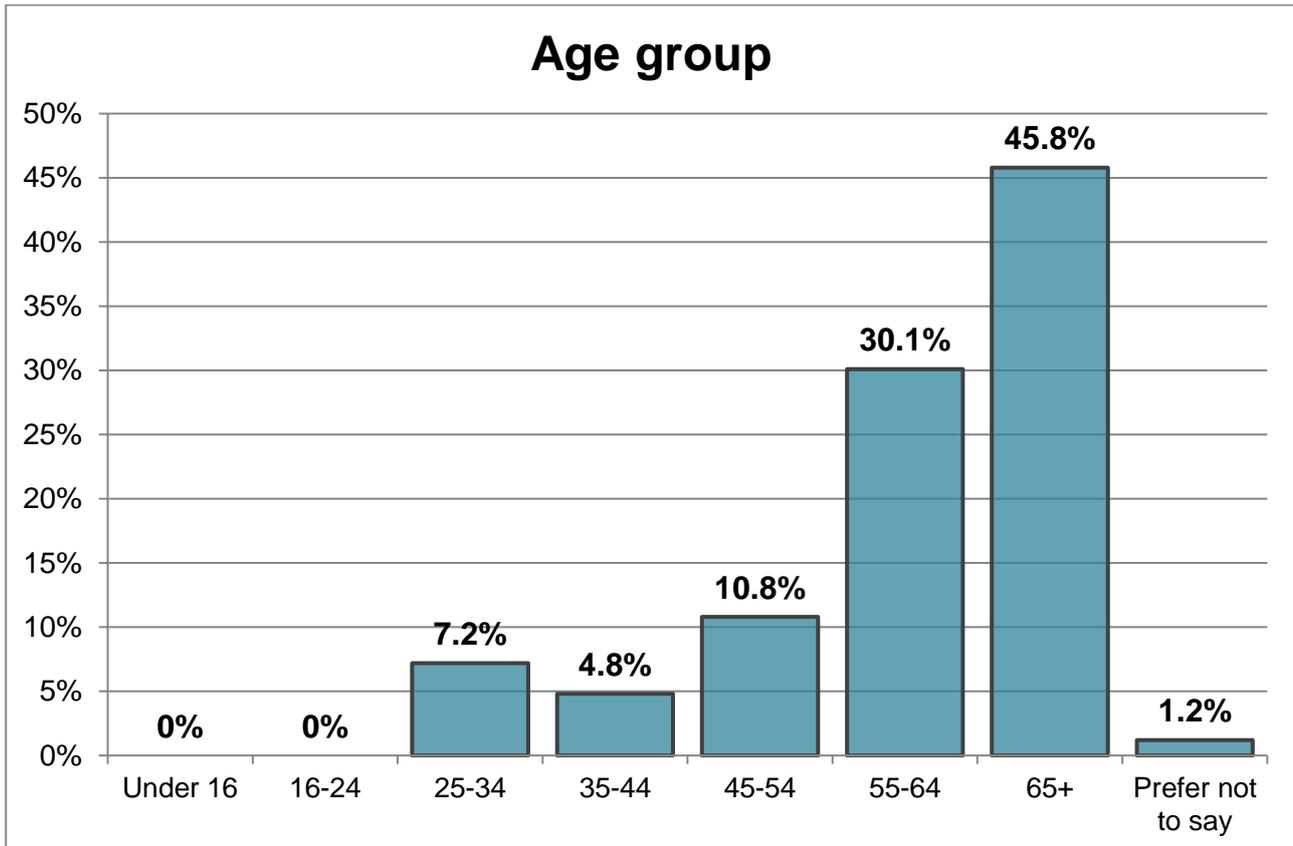
6 respondents ticked 'Other' and specified an area in the district, as below:

Compton	1
West Broyle	1
Stansted Park	1
West Dean	1
West Wittering	1
Hunston	1

There were no responses from Bosham, Boxgrove, Bury, Fernhurst, Ifold, Nutbourne, Petworth, Plaistow, Rogate, Southbourne, Stedham, or Westbourne.

Of the **3** respondents who don't live in the Chichester District, **2** (2.4%) said they work in the district, and **1** (1.2%) said they regularly visit the district.

Most responses came from those aged 65+ (**45.8%** or 38) and those aged between 55 and 64 (**30.1%** or 25). The table below details the distribution of age groups across respondents.



There were more female respondents (**55.4%** or 46) than male (**43.4%** or 36) in this consultation. **1.2%** (1) did not wish to disclose their gender.

16.9% of respondents (14) said they have a long-term illness, health problem or disability which limits their daily activities. **79.5%** (66) said they do not and **3.6%** (3) did not wish to disclose this information.

Council response:

The survey was shared using a number of communication tools including promotion through elected members and parish councillors, the website, online platforms and a media release. The promotion of the survey through social media ensured a range of ages were reached. Despite this a number of areas did not comment on the survey.

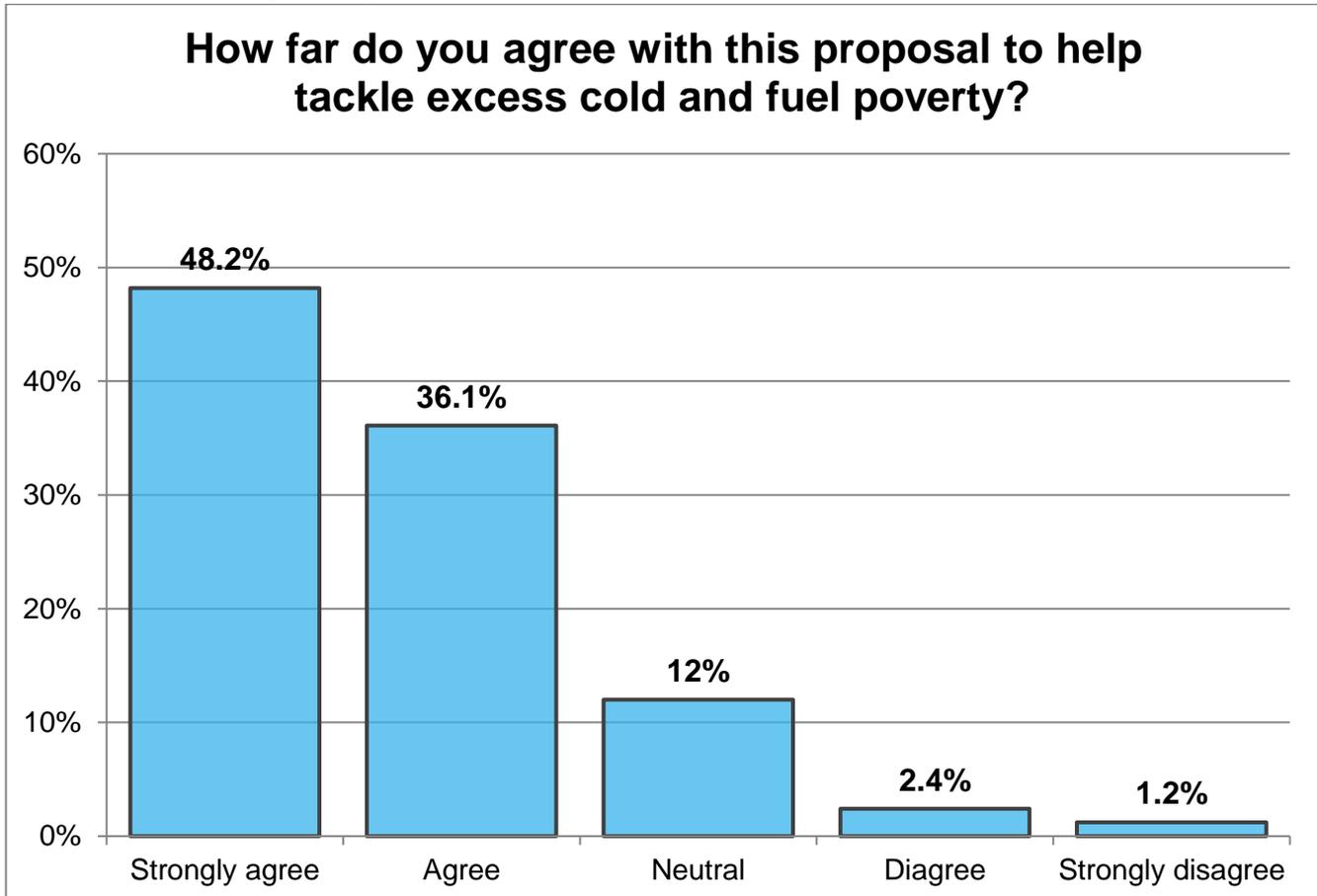
The responses received were a fair representation in terms of distribution across the district.

Section Two: Helping to tackle excess cold and fuel poverty

We asked respondents to what extent they agreed with the draft Financial Assistance and Enforcement Policy’s proposal to expand the Chichester Warm Homes Initiative’s eligibility criteria in order to help more residents and landlords.

Respondents were given a summary of the proposal and signposted to the relevant pages of the draft policy for more information.

The majority of respondents either **strongly agreed (48.2%** or 40 individuals) or **agreed (36.1%** or 30 individuals) with this proposal. **12%** (10) were neutral, **2.4%** (2) disagreed, and **1.2%** (1) strongly disagreed.



33 respondents provided comments on this proposal and a full list of all of these comments has been provided to the service area for analysis.

Further comments

Row no.	Comments	Count
1	There needs to be a stronger acknowledgment of the Climate Emergency Action Plan and how the domestic sector will be enabled to meet the target within the plan	6
2	There should be property with lower rent to enable occupants to pay for energy bills	1
3	Financial assistance should be provided through a third party	1
4	Support group improvement schemes designed for the older properties so not everyone has to design their improvements from scratch which could potentially offer economies of scale in their	

	implementation.	
5	Check contractors are providing a high standard of workmanship	1
6	Ensure the scheme is widely promoted and Information widely available to reach people in rural areas.	1
7	There is a psychological barrier to the need for "change".	1
8	Will housing association property be applicable for such benefits? If so will such assistance come with a requirement for them to have a positive maintenance policy in place rather than the ineffective reactive policy they utilise.	1
9	Landlords should not get the money only the people paying the bills	1
10	I have any scepticism about is the use of cavity wall insulation stopping the bricks from aerating and ejecting water effectively. Solar and ground source heat pumps are better investments of council money.	1

Council response:

There was strong support for this proposal with the most frequent comment by far being the call for a stronger acknowledgment of the Climate Emergency Action Plan. Unfortunately as the Financial Assistance and Enforcement Policy And Climate Emergency Action Plan were being drafted at the same time, it may not have been sufficiently acknowledged, but this will be reviewed to ensure the plan is suitably represented in the final policy put before Cabinet.

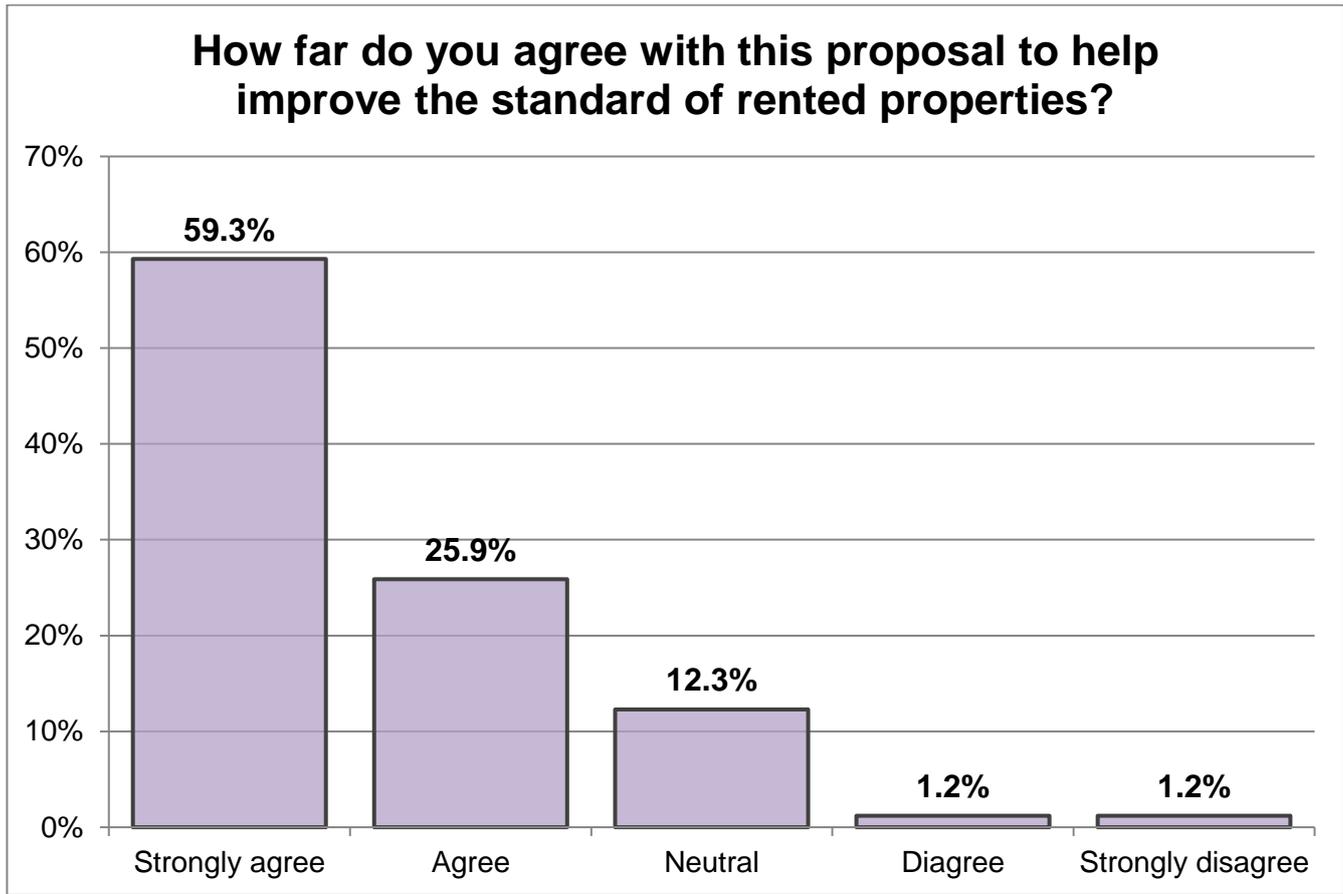
The Council's appointment of a Climate Change Officer earlier this year has already allowed for closer joint working with housing and it is proposed in the Action Plan to build on this in future.

Section Three: Helping to improve the standard of rented properties

We asked respondents to what extent they agreed with the draft Financial Assistance and Enforcement Policy's proposal to continue the Chichester Landlord Accreditation scheme.

Respondents were given a summary of the proposal and signposted to the relevant pages of the draft policy for more information.

The majority of respondents either **strongly agreed (59.3%** or 48 individuals) or agreed (**25.9%** or 21 individuals) with this proposal. **12.3%** (10) were neutral, **1.2%** (1) disagreed, and **1.2%** (1) strongly disagreed.



28 respondents provided comments on this proposal and a full list of all of these comments has been provided to the service area for analysis.

Further comments

Row no.	Comments	Count
1	There needs to be a stronger acknowledgment of the Climate Emergency Action Plan and how the domestic sector will be enabled to meet the target within the plan	6
2	I do not support issuing financial assistance to landlords	6
3	Housing Associations should be included in the policy and be subject to the same compliance and inspection as private landlords	2
4	Increase the profile of the scheme to both tenants and landlords	1
5	Landlords should also be responsible for the external appearance and outside spaces of their properties	1
6	Forcing landlords to improve properties is a good thing but the legislation is becoming too tenant biased and making it unviable for many landlords to stay in the business.	1
7	It is important to monitor the performance of contractors	1
8	There should be no rent increase for at least 5 years to reflect the pay back of the community's investment. Council should press for legally enforceable energy efficiency standards.	1
9	We have used this help several times in the 15 years we have been landlords and would not have been able to put in quality bathrooms	1

	and kitchens without it - it is an extremely sensible system that is well administered. Please retain it as a priority.	
10	I would rather see a system introduced that takes a firmer approach in setting good standards and offering failing landlords the option to surrender properties to Council ownership and management.	1

Council response:

There was strong support for the need to continue improvements in the private rented sector, as this will help maintain standards and be beneficial to the overall condition of the housing stock in Chichester district. However, there were mixed views on how best this could be achieved, nevertheless the need to improve the energy efficiency of domestic premise, in light of the climate emergency was a frequent comment.

A number of respondents would like the Council to use more enforcement action to bring about improvements, whilst others liked the idea of a balanced approach between assistance, advice and enforcement. A number of respondents did not support the provision of financial assistance to landlords, whose responsibility it is to maintain standards in their properties.

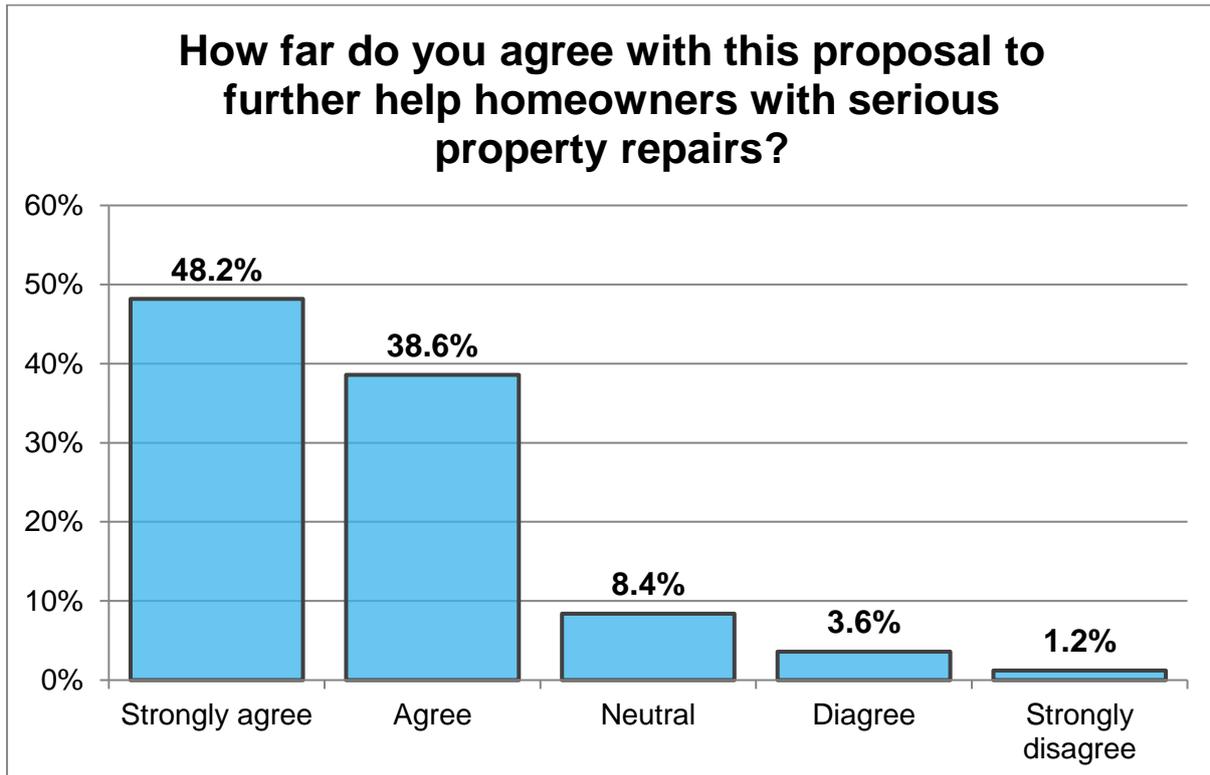
This policy provides the Council with a number of tools to improve this sector; however as experience has shown enforcement alone will not bring about meaningful improvement, especially when resources are limited. Building strong relationships with landlords, who consequently behave more responsibly and maintain their homes to a good standard, is highly beneficial to a local authority. Landlords who wish to become accredited by improving their properties to the Council’s own property accreditation standard, and abiding by the Council’s own code of property management benefit from a small financial benefit.

Section Four: Helping homeowners that can’t afford repairs to their homes

We asked respondents to what extent they agreed with the draft Financial Assistance and Enforcement Policy’s proposal to increase the amount of funding available through the Home Repairs Assistance scheme to help homeowners on low incomes rectify serious health and safety hazards in their properties.

Respondents were given a summary of the proposal and signposted to the relevant pages of the draft policy for more information.

The majority of respondents either **strongly agreed (48.2%** or 40 individuals) or agreed (**38.6%** or 32 individuals) with this proposal. **8.4%** (7) were neutral, **3.6%** (3) disagreed, and **1.2%** (1) strongly disagreed.



28 respondents provided comments on this proposal and a full list of all of these comments has been provided to the service area for analysis.

Further comments

Row no.	Comments	Count
1	There needs to be a stronger acknowledgment of the Climate Emergency Action Plan and how the domestic sector will be enabled to meet the target within the plan	4
2	Concern about the impact on the council's finances	2
3	There need to be rapid action to rectify fire hazards	1
4	Set up an organisation to carry this out and check it is done to the required standard, there are many ways to achieve higher standards just don't hand out money	1
5	Some residents will need support to manage to the upheaval of major repairs. This needs to be addressed in some way.	1
6	Ensure there is a strong publicity campaign	1
7	If you are financing homeowners, what about the homeless!	1
8	Monitor contractors and the standard of work	1
9	Train the homeless to undertake repairs for free. It's all very Labour government with give people money. What is wrong with people earning money? I recently learned how much a packet of cigarettes costs. Perhaps if people need financial help you could get them to stop smoking first.	1
10	Create a fully vetted preferred list of contractors' epithet a mix of social enterprise businesses with apprentice schemes within to support work in local areas.	1

11	Supply the materials and let the tenants do the work good health and wellbeing experience.	1
12	No. Once again depends on how they manage their resources	1
13	It sounds like a sensible policy, but why the arbitrary £40,000 limit? If the amount of money provided for works is repayable at the point of selling the property, should there be scope to base the limit of this finance on the open-market prospects of the property? Further, an extension of this scheme would see the money invested as a share of the current value of the property and which could generate a margin of "profit" for re-investment in the scheme when the property is sold.	1

Council's response

The respondents strongly supported this proposal; however there were further requests to ensure the Climate Change Action Plan is acknowledged as the domestic sector will need to be enabled to contribute towards meeting the target.

Some concerns were raised about the financial impact of this part of the policy on the Council's finances. However residents can be assured this budget is capital funding that was established a number of years ago, and is not part of the revenue budget charged to council tax.

This policy will assist those householders on the lowest income, whose properties have serious health and safety hazards. This will allow householders to remain safe in their homes, thereby reducing pressure on other public services.

After receiving feedback from the public consultation, the draft policy has been amended to include provision of help and support to homeowners who choose to move to a more suitable property. In this instance the Council will provide financial assistance to meet the upfront costs of moving. This will also include facilitating support for the most vulnerable, and those in financial hardship. All monies will be recovered on sale of the property.

It is worth noting there is an expectation that more residents will require this assistance following the effect of the pandemic on household income.

Section Five: Helping those who are disabled with facilities grants

We asked respondents whether they had any comments about the Disabled Facilities grant scheme, which is a mandatory grant scheme designed to help disabled residents install beneficial adaptations in their properties.

Respondents were given a summary of the proposal and signposted to the relevant pages of the draft policy for more information.

31 respondents provided comments on this proposal and a full list of all of these comments has been provided to the service area for analysis.

Further comments

Row no.	Comments	Count
1.	Strongly support	17
2.	Raise the profile of these grants and make them easier to access	4
3.	Some residents have difficulty obtaining permission from their landlord	1
4.	Ensure contractors are qualified and achieve high standards	1
5.	Include home help in the assistance	1
6.	Resolve issues around planning permission as this can prevent some adaptations being done.	1
7.	There needs to be a stronger acknowledgment of the Climate Emergency Action Plan and how the domestic sector will be enabled to meet the target within the plan	1
8.	Currently planning and building regulations are often very accommodating to meet proven need but perhaps greater flexibility might be achieved by allowing temporary or off site construction techniques to enable adaptation to property - such adaptation might be a condition to have to be removed or a full planning application made to testing once the immediate needs of an occupant may have passed.	1
9.	A specific contact should be available for anyone disabled who may be in distress of any kind. Places for homeless people should be paramount with additional aid to help them back into the workforce.	1

Council's response:

There were a lot of supportive comments for this assistance to enable disabled residents to remain independent at home.

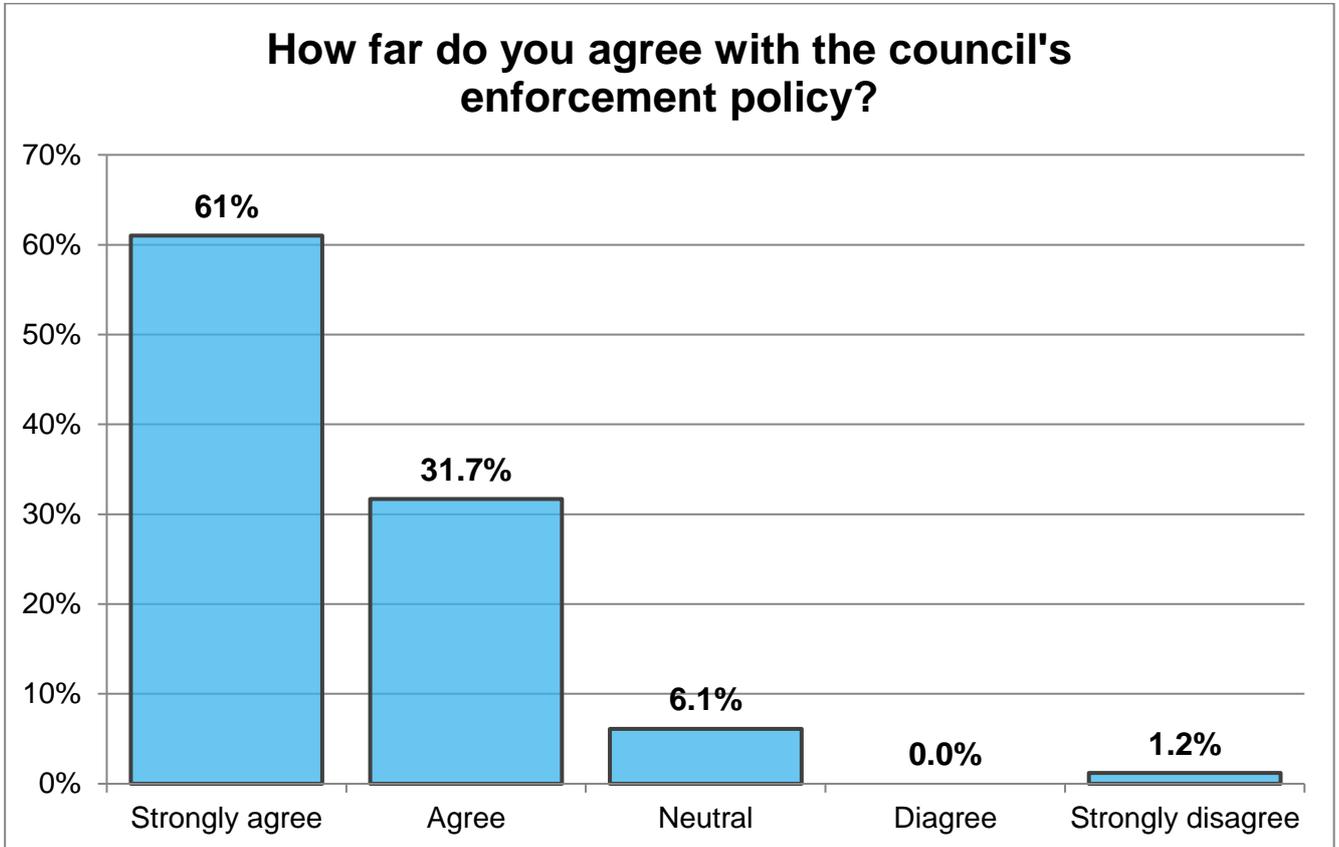
Some respondents felt the public's awareness of the grant was not sufficient, this has been noted as a matter to investigate with action to follow as required.

Section Six: Enforcement policy

We asked respondents to what extent they agreed with the council's enforcement approach and the powers available to inspecting officers to regulate and manage non-compliance.

Respondents were given a summary of the proposal and signposted to the relevant pages of the draft policy for more information.

The majority of respondents either **strongly agreed** (61% or 50 individuals) or **agreed** (31.7% or 26 individuals) with this proposal. 6.1% (5) were neutral, 0% disagreed, and 1.2% (1) strongly disagreed.



20 respondents provided comments on this proposal and a full list of all of these comments has been provided to the service area for analysis.

Further comments

Row no.	Comments	Count
1	The Council needs to ensure that it has sufficient resources to properly implement this policy.	3
2	We must however always be clear as to how a given position has been reached. There should be an emphasis on 'fairness' and officers should be properly trained.	3
3	Take over the property totally.	2
4	Just using stick not sufficient leaving costly penalty processes. Better invest in people to explain, encourage, advise and facilitate and manage non-compliance.	1
5	What about enforcement tools for landlords who have unacceptable tenants?	1
6	It is pointless enacting legislation that cannot be enforced, either judicially or by education and advice.	1

7	Agencies representing landlords should also be legislated against if they are inefficient - Chichester has some agencies that are very poor.	1
8	I hope that this will be applied to Housing Associations who often fail in this regard.	
9	It is unreasonable for the Council to act as judge and Jury on enforcement. If a property owner fails to comply with legislation the Council should take enforcement action through the Courts. It should not take on powers to fine owners. The proposed appeals mechanism is completely inadequate and biased to the Council's self-interest and appears unjust.	1
10	A firm option handed to failing landlords to surrender their rental properties to Council ownership and management might provide a quicker route to returning decent housing to a rental market.	1

Council's response

Over 90% of the respondents agreed with the proposed enforcement policy providing the policy is implemented fairly.

There were concern raised by some regarding resources to implement the policy. It is acknowledged that since the start of the pandemic, the Council has been under increased financial pressure to make efficiency savings and increase revenue. The Council will therefore continue to support and encourage landlords to take their role seriously, with the aim of reducing the number of tenant complaints and the need for enforcement. Nevertheless it will be still be imperative to have a detailed, robust enforcement policy available for the most serious cases.

Section Seven: Further comments

27 respondents provided further comment about the Financial Assistance and Enforcement Policy and a list of all of these comments has been provided to the service area for analysis.

Row no.	Comments	Count
1	Make policy demonstration of CDC commitment to climate emergency measures.	5
2	As stated in previous areas, the biggest issue with this document is it is about 'Financial Assistance...' It fails entirely to consider the non-financial considerations. I don't think that all the resistance to "change" relating to improvements in the energy efficiency of a home is down to financial matters alone. There probably needs to be an educational campaign to accompany the deployment of the scheme that helps to tackle fears that people might have about the disruption to their lives, livelihoods, and the security of their building and possessions when work is undertaken. It might, for example, help if all possible improvement works were carried out by vetted Council contractors, and that clear schedules of works could be shown to home owners to indicate exactly when and where access to their homes would be required in order to carry	2

	out the works with suitable security measures in mind.	
3	Living and working in a rural area is costly and there is little assistance. Housing is rare and in the private domain. Houses are generally old, often listed, and the choices for heating are limited with most relying on electric and coal/wood. Insulation is often poor and at the minimum levels required.	1
4	I agree in principle but funds should not be diverted from other good causes to fund it. The landlords took on the undertaking of renting out their property and it is their responsibility to maintain it, not the councils.	1
5	Enforcement needs to be effective if standards are to be maintained. Tenants need to be protected.	1
6	Although I am financially secure and do not envisage ever needing any of the financial assistance offered I support the provision of financial support where it is needed in order to (a) those in need are provided with the support they need (b) the housing stock in the district is kept in good order for future generations. I realise one way or another, this will have to be funded by me and others who are financially secure.	1
7	The aims of this policy are very good and I just hope that the publicity and the resources are such that it can be implemented to the full and as quickly as possible.	1
8	More needs to be done to stop private landlords exploiting the system.	1
9	Things are becoming increasingly difficult for people now; with many out of work and housing too expensive therefore Councils have a duty to help. It is time the housing situation was overhauled	1
10	Tenants should pay their rent on time.	1
11	Please see my earlier comment about using council money and financial assistance to landlords to apply to those who are not current landlords of housing but have retail property e.g. in Chichester centre which could and should be converted to residential especially for the needy.	1
12	I do not believe that you should just hand out money. Very Labour government attitude. There are many of us who have worked hard all our lives, gone without, and do not get government grants but you want to take money from us via council tax and just give it out to anyone.	1
13	It will always be important that the public interface of this work is seen in a positive way and is primarily about improvement and a place where particularly those in the private rented sector but also those with social landlords can turn to without repercussions Equally, the required standard must be made clear to landlords and perhaps moving more to a position of accreditation of property management firstly by recognised qualification and then backed by a period of assessed practice competence that for instance exists within RICS would be where we should be moving	1
14	Lots of people must be able to repay the council for the best way to help others who cannot.	1
15	Allow residents of estates to plant trees in suitable outside spaces.	1
16	I am concerned that enforcement will not take place due to a shortage of staff.	1

17	Just stick to what you should be doing and spend money on and not find other ways to spend it.	1
18	Those that are in receipt of funds should report to committee the benefit outcome	1
19	As long as this is warrantied and there is no possibility of the resident or the landlord being able to help themselves then I agree with your policies. I would want a good look at all their personal finances.	1

Council's response

Throughout the survey respondents had strong feelings that the climate change emergency should have a higher profile in the policy. This has been noted and will be taking into account when the document is reviewed, and before the final policy is put before Cabinet in February 2021.

Another common theme raised was that the barrier to some residents taking up much needed assistance was the upheaval and lack of support available to assist them through any improvement works. Whilst the Council is unable to offer a full hand-holding service, officers are able to help applicants obtain quotations, organise clearing and cleaning for disabled residents, and organise repairs in order for more substantive works to progress.

For those wishing to install energy efficiency improvements, the Energy Visiting Service is available to provide a more personal service to those who require it. Officers are well placed to sign-post residents to more specialist support services as required.

Conclusions

- The majority of respondents were **residents** of the district (**79**), and most (**41.5%** or 34) live in **Chichester City**, with representation from a range of other areas in the district, including The Witterings, Selsey, Midhurst, Tangmere and Wisborough Green.
- Most respondents were aged over 65 (**45.8%** or 38) or between 55 and 64 (**32.1%** or 62) and those over 65 years (**30.1%** or 25). The fewest responses came from those aged 35-44 (**4.8%**) and no responses were received from respondents under 16 years of age or between 16 and 24.
- There were more female respondents (**55.4%** or 46) than male (**43.4%** or 36) in this consultation.
- Most respondents told us they **strongly agreed** (**48.2%** or 40 individuals) or **agreed** (**36.1%** or 30 individuals) with the **proposal to expand the Chichester Warm Homes Initiative** in order to tackle excess cold and fuel poverty in the district.
- When asked if they agreed with the proposal to **continue the Chichester Landlord Accreditation scheme** in order to help improve the standard of rented properties,

the majority of respondents either **strongly agreed** (59.3% or 48 individuals) or **agreed** (25.9% or 21 individuals).

- We asked respondents to what extent they agreed with the proposal to **increase the amount of funding available to help homeowners on low incomes** with essential property repairs. The majority either **strongly agreed** (48.2% or 40 individuals) or **agreed** (38.6% or 32 individuals).
- The majority of respondents either **strongly agreed** (61% or 50 individuals) or **agreed** (31.7% or 26 individuals) with the **council's enforcement policy**.
- **167 individual comments** were received and these have been given to the service area for analysis.
- It is worth noting that this consultation received fewer responses than previous recent consultations. This may be due in part to a series of consultations that have needed to take place in quick succession, resulting in consultation fatigue amongst potential participants.

Appendix A – Social Media Reach

Social media campaign results:

- **57** total clicks (47 on Facebook and 10 on Twitter)
- **65,196** total reach (56,426 on Twitter; 5,654 on Facebook; 3,116 on Nextdoor)
- **14** retweets / shares on Facebook and Twitter
- Positive engagement rate of **4.12%** on Facebook and Twitter

20% of households in the Chichester District are on Nextdoor. This is a very high engagement figure– most authorities can only reach around 5% of their population.

Appendix B – Consultation promotion

- A media release was sent out promoting the consultation and another to remind people of the deadline.
- The consultation was also promoted within the Leader's column, District Dispatch, in the Chichester Observer and the Midhurst and Petworth Observer.
- Local partners and organisations (such as, Parish Councils, leisure centres, hospitals, WSCC etc.) were contacted and asked to support promotion of the consultation.

- The consultation was promoted in the council's general email newsletter, Sussex Police's Neighbourhood Watch bulletins for the area, and in West Sussex County Council's Your Voice consultation newsletter.
- West Sussex County Council also promoted the consultation on their Consultations Hub web page.
- Members were provided with posters and link to the consultation page for promotion in their areas.
- An email was sent to **703** Let's Talk Panel members.
- The consultation was promoted on social media – see Appendix A for a full breakdown.
- A campaign banner promoting the consultation was displayed on the homepage of the council website. An advertising banner was also displayed at the top of every web page. This was viewed **39,853** times.
- The survey was sent to all CDC staff and placed on the intranet and Workplace. A desktop advert was also created and displayed as background on staff laptops.