

Our ref:  
Please ask for: Mr Jeremy Mann  
Tel: 01271 388341  
Email: Jeremy.Mann@northdevon.gov.uk  
Date: 13 December 2022



Caroline Crowther and Charlotte Spencer (Jobshare)  
Director, Private Rented Sector and Leasehold  
Department for Levelling Up, Housing and Communities  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Dear Caroline Crowther and Charlotte Spencer

**RE: HOUSING STANDARDS IN RENTED PROPERTIES IN ENGLAND**

I write to formally acknowledge receipt of the Secretary of State's letter to my Chief Executive of the 19<sup>th</sup> November, 2022 and your follow on communication dated the 25<sup>th</sup> November, 2022.

In accordance with the Council's responsibilities under Section 3 of the Housing Act 2004 to keep housing conditions in their area under review, it has procured the following:

1. Dwelling Level Housing Stock Modelling and Database. Building Research Establish Ltd., 2019.
2. ND Home Analytics housing stock data. Energy Saving Trust, 2019.
3. ND Fuel Poverty and Domestic Energy Efficiency Analysis, Yes Energy Solutions, 2020.
4. In collaboration with other Devon district authorities, it also gained access to Parity Projects' Housing data analytics, 2022.
5. NDC has established a strategic partnership with the LSVT landlord, North Devon Homes (NDH). NDH accommodate approximately 10% of the local population. Through this collaboration, the Council is aware that 20% of their stock is surveyed on an annual basis as part of their asset management strategy.



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PO Box 379, Barnstaple, EX32 2GR  
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The headline findings from the BRE report were:

There are 45,771 dwellings in North Devon, 68% are owner occupied, 22% private rented and 10% social rented.

8,233 dwellings in the private sector have Category 1 Housing Health and Safety Rating System (HHSRS) hazards. This equates to 20% of properties.

1,649 dwellings in the private rented sector have Category 1 HHSRS hazards. This equates to 17% of properties in the private rented sector.

For all stock, the performance of the housing stock in North Devon compared to the EHS England average is mixed. North Devon performs significantly worse for all hazards (19% compared to 12%), which is mainly a result of high levels of excess cold in North Devon (13% compared to 3% in England).

North Devon performs slightly worse for fuel poverty (Low Income High Costs definition) (15% compared to 11%, and slightly better for falls (6% compared to 7%), disrepair (3% compared to 5%) and low income households (23% compared to 27%).

When comparing North Devon to the South West region, the picture is similar with North Devon performing significantly worse for all hazards (19% compared to 13%) and excess cold (13% compared to 5%).

**Table 1:** Estimates of the numbers and percentage of dwellings meeting the key indicator criteria assessed by the Housing Stock Models and Housing Stock Condition Database for all stock and private rented stock.

Indicator	All stock				Private sector stock			
	North Devon (no.)	North Devon (%)	2014 EHS Regional (%)	2014 EHS England (%)	North Devon (no.)	North Devon (%)	2014 EHS Regional (%)	2014 EHS England (%)
No. of dwellings	45,771	-	-	-	41,031	-	-	-
HHSRS category 1 hazards	8,618	19%	13%	12%	8,233	20%	14%	13%
All hazards	8,618	19%	13%	12%	8,233	20%	14%	13%
Excess cold	5,960	13%	5%	3%	5,734	14%	6%	4%
Fall hazards	2,654	6%	6%	7%	2,573	6%	6%	7%
Disrepair	1,309	3%	3%	5%	1,153	3%	3%	5%
Fuel poverty (10%)	5,712	12%	11%	12%	5,217	13%	11%	11%
Fuel poverty (Low Income High Costs)	6,727	15%	12%	11%	6,222	15%	12%	10%
Low income households	10,505	23%	25%	27%	7,197	18%	18%	18%

*N.B. the information on hazards refers to the number of dwellings with a hazard of the stated type. Because of this there is likely to be some overlap – for example, some dwellings are likely to have excess cold and fall hazards but this dwelling would only be represented once under 'all hazards'. The number of dwellings under 'all hazards' can therefore be less than the sum of the excess cold plus fall hazards.*

The HHSRS' Guidance recognises certain deficiencies have a direct effect, or contribute to more than one hazard. For example, the contributory factor the absence of background warmth/cold hazards, makes to condensation (surface dampness and black mould). The Council is not, however, able to extract specific data on the prevalence of Category 1 and 2 damp and mould hazards from the BRE report, but has made enquiries to see if this information can be made available.



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The Council has most recently focussed its attention on interventions linked to addressing cold hazards and the promotion of energy efficiency because of this assessed need. This will have had a consequential positive impact on the prevalence of damp and mould, although this was not stated as an objective at the time.

Some of the output from this Council's work, in conjunction with its partners, is summarised in Tables 2 – 9 below:

**Table 2:** ECO declarations; over 800 signed (NB: Significant reduction in activity during 2 years of pandemic. 2022/2023 reduction due to ending of ECO3).

2019/2020	411
2020/2021	164
2021/2022	193
2022/2023	34

**Table 3:** ECO Warm Up Grants; 191 agreed (NB: Significant reduction in activity during 2 years of pandemic. 2022/2023 reduction due to ending of ECO3), use of Better Care Funding.

2019/2020	165
2020/2021	11
2021/2022	11
2022/2023	4

**Table 4:** ECO Measures.

	2019-2020	2020-2021	2021-2022	2022-2023	TOTAL
1 measure	318	83	90	21	512
2 measures	59	71	89	13	232
3 measures	7	10	14	0	31
Not stated/ Duplicate	27	0	0	0	27
TOTAL	411	164	193	34	-

**Table 5:** LAD 2 output – 174 properties in ND with total spend £1,674,053 (against initial allocation of £875K).

Measures:

- Solar PV = 165
- Loft insulation = 30
- Cavity wall insulation = 4
- Internal wall insulation = 4
- Air source heat pump = 4
- Ventilation = 3



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**Table 6: Sustainable Warmth (LAD3 and HUG1) to date:**

73 households registered (against target of 58); of these, 27 surveys completed, 19 Options Evaluation complete, 16 Retrofit Designer received Options Evaluation, 13 costing design pack completed.

**Table 7:** NDH received £460K grant funding, together with their contribution of £230K to undertake external wall insulation and loft top-ups, thermal doors to 19 properties and upgraded heating systems (from E7 to the high heat retention heaters) for about 30 properties. Also some more minor measures in terms of draught proofing and cylinder insulation upgrades.

**Table 8:** NDH completed a 'Boxergy' project where they installed air source heating with a heat store and battery store to 7 properties in Witheridge with funding from the Energy Savings Trust.

**Table 9:** NDH also trailed smart controls for E7 heating to 40 properties in conjunction with National Energy Action (NEA). This has been fully funded by Energy for Tomorrow.

HUGS2: Application has been submitted (18<sup>th</sup> November), attached; aiming for 643 properties over 2 years with a combined budget of £13m. East Devon (funding share 19.70%), Exeter (6.31%), Mid Devon (16.52%), **North Devon (15.40%)**, Teignbridge (16.69%), Torridge (16.61%) and Torbay (9.77%). The application also includes increasing the partnership's capacity to triage enquiries which aim to help increase our engagement activity.

In relation to improving standards in the private rented sector, the Council has recently taken the opportunity to address both damp and mould concerns in its updated amenity standards for HMOs. This is available at:  
<https://www.northdevon.gov.uk/media/381442/2022-amenity-standards-document.pdf>

Points to note from the document are:

Heating Requirements (pages 3 – 4)

We stipulate a number of locally adopted standards pertaining to heating requirements, and our standards also make mention to how fixed heating can reduce hazards associated with damp and mould by reducing the incidence of condensation and the prevalence of cold surfaces.

Personal Washing Facilities and WCs (pages 4 – 6)

In addition to a number of other locally adopted standards, we request that licence holders ensure that bathrooms have mechanical ventilation to the outside air, in addition to any window(s), and state that ventilation should not be obstructed. We advise that ventilation extracts and reduces moisture-laden air contributing to damp and mould.



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## Energy Efficient (page 19)

We recommend that licence holders take reasonable steps in improving the energy efficiency of their properties and work towards improving the EPC towards Band C, where practicable.

## Washing and Drying Facilities (page 21)

We also recommend that landlords provide provisions for both the washing and drying of clothes, as this reduces hazards associated with damp and mould by reducing the incidence of condensation, and it can also result in a reduction in redecoration and maintenance costs associated with high moisture levels.

I have also provided information regarding the Council's regulatory activity in the attached appendices:

- i. Appendix A – Housing standards request for service received.
- ii. Appendix B – Housing Act Notices served.
- iii. Appendix C – Prosecutions.
- iv. Appendix D – Category 1 and 2 hazards identified and eliminated.

The Chief Executive has requested that the Minister's letter and your follow-up communication are formally presented to Councillors. This will occur on the 9<sup>th</sup> January, 2023 at the Council's Strategy and Resources Committee.

This report will also allow Councillors to consider the adoption of a plan of action on mould and damp concerns in privately rented accommodation, in conjunction with setting out its wider regulatory proposals to drive up standards in their sector. This work will be informed by a needs' assessment undertaken in collaboration with relevant partners.

The decisions made on the 9<sup>th</sup> January, 2023 will then support the Authority's full response to DLUHC, later in the month.

Kind regards.

Yours sincerely

J W Mann  
Head of Planning, Housing & Health

*Encs. Appendix A, B, C and D*



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