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Communities and Local Government Committee  
House of Commons  
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By email to [clgev@parliament.uk](mailto:clgev@parliament.uk)

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Dear Ms McCoy

Please find below Circle Anglia's response to the Communities and Local Government Consultation:  
***Beyond Decent Homes: decent housing standards post 2010***

As well as answering your consultation questions there are three key points we wish to make in response to this consultation paper.

### **Funding**

The social housing sector has invested heavily in refurbishing existing stock and building new homes for social renting and purchase. There are now few additional resources that we can commit to achieve significantly higher standards, though it is fair to say that our long term maintenance programmes can resource a standard that is higher than the current decent homes standard provided rental income is maintained. This fully accords with the group's commitment to the 'life chances agenda' that we have adopted across all our partner Registered Providers.

We are not now able to resource the improvements required to energy efficiency, installation of new technologies and microgeneration equipment to meet a very substantial increase in SAP standards or the carbon emissions reductions currently anticipated without grant funding or a mechanism that allows us to share the costs of improving homes with residents.

In order to meet the Government's objective of reducing CO2 emissions by 30% of 2006 levels in 2020 and approach zero emissions by 2050 the sector will have to invest enormous sums. At Circle Anglia we estimate that to achieve the 30% reduction in 2020 we will, in addition to programmed maintenance and renewal, have to invest £24m to achieve high insulation across group stock and a further £290m to provide at least one renewable technology in each home we let.

Residents have increasing expectations of services and quality of housing provided within the social sector however the resources available to deliver services and improvements are largely fixed by current rental regimes. Residents could be offered improved services if they were willing to pay increased rent charges.

### **Regulation**

We support the TSA's view that regulation should be reasonable, proportionate and operate an escalating scale of intervention when organizations fail to deliver the services that residents want. It is the case that the private rental sector remains very lightly regulated in comparison and the regulation that does exist is compromised by the resources available to enforce it, particularly in Local Authorities

### **Balance between private and public sectors**

The condition of the social sector stock is measurably better than that operated by both private landlords and home owners. Due to the demand for social housing and shortage of stock we have created a paradoxical position where a citizen who works hard and achieves enough to be ineligible for social housing is likely to have to live in a home that is in poorer condition with far lower energy efficiency than his neighbor in a social housing unit.

It therefore seems reasonable that public policy, as a long term objective, should use incentives and regulation to improve the standards within the private sector to level standards across all rented tenures.

Please do not hesitate to contact me if I can be of any further assistance on 0207 447 3207.

Yours sincerely

**John Daley**

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Assistant Director (Asset Strategy)

## **1. Consultation Responses from Circle Anglia**

### **1.1. What lessons can be learned from the Decent Homes programme and equivalents in Scotland, Wales and Northern Ireland?**

- Overall, DHS has been very successful. It has prompted major investment programmes and raised the standard of socially rented stock across the sector. Also many social landlords now have excellent information on their stock condition. This now allows very accurate long term refurbishment planning.
- That the standard is not perceived to very high. Elements can fail but overall the property still meets DHS. This does not satisfy residents who find the distinctions between pass and fail arbitrary and difficult to understand.
- The standard should be increased so that no single element may fail.
- The Decent Home Standard does not address all areas of the property that are important to residents – e.g. Security, external areas etc.
- A new DHS should
  - Accept that different properties have varying potential for improvement and ensure that measurements reflect this.
  - Ensure that all building elements are measured and not allow landlords to ‘trade’ elements to achieve decency.
  - Use SAP ratings as the key measure of energy efficiency.
  - Have standards for security.
  - Consider waste disposal and recycling.
  - Consider access to the property including the provision of lifts.
- A particular issue for Circle Anglia’s residents in some rural areas is that a significant number of properties are not able to receive a gas supply. Oil is often used as the fuel for heating systems. This is expensive and only sold in large batches. This greatly increases levels of fuel poverty in these areas.
- The new standard could include a duty to take action to supply affordable energy in partnership with energy suppliers. Large energy suppliers are beginning to take social tariffs seriously however heating oil suppliers tend not to be large companies and are therefore less likely to discharge a corporate social responsibility role.

### **1.2. Where targeted housing fails to reach the Decent Homes criteria by 2010, how should this backlog be addressed?**

- At present stock transfer is the best option to rapidly bring failing stock to the required standard to meet DHS.
- Circle Anglia (and a small number of other large housing groups) has a proven track record of stock transfer and the successful delivery of large programmes of investment.
- This does not however address the condition of private rented property, some of which is in increasingly poor condition when compared to social housing. The same standards should be applied to private landlords.

### **1.3. Should minimum acceptable social housing standards be amended to take account of environmental standards, fuel poverty and the estate?**

- Yes, both social policy and environmental concerns demand that all rented property be regulated in terms of energy performance. Setting mandatory minimum SAP

ratings which increase over time will address both issues of energy poverty and carbon emissions.

- Circle Anglia's mission is to enhance life chances of its tenants so we also actively develop a wider community role as we see the importance of moving from decent homes to decent communities.
- This is unlikely to have a damaging effect on social landlords as their stock is, on average, the highest performing sector.
- There is also an opportunity to address the wider sustainability of the community – RPs should be encouraged and supported (financially) to contribute to helping to create sustainable communities.
- Shared heating schemes using alternative technology will particularly address fuel poverty in rural areas dependent on oil heating systems.
- We are actively seeking partnerships with local authorities and other local service providers through the LAA/LSP/SCS process.

**1.4. Do the management organizations—councils, including via ALMO's, and housing associations—need to change? Will they have sufficient funds?**

- The social sector manages its stock better than private owners or renters. However there is scope for considerable further improvement.
- The key problem is that resources are not now available for substantial improvements to social housing. This is largely because the sector has committed its resources to funding Decent Homes programmes and developing new stock.
- However if we could charge residents a proportion of the costs of improvements then additional resources could be obtained. Particularly if it could be justified by reductions in energy costs for example.

**1.5. What are the implications for decent housing standards of the Government's proposal, currently out for consultation, to move to a devolved system of council housing finance?**

- It is likely to release resources for Local Authorities who have not yet created programmes for DHS compliance to begin work.

**1.6. How should the Decent Homes target for private sector homes occupied by vulnerable people be taken forward?**

- It is difficult (and possibly inappropriate) to separate vulnerable people from other residents of private sector housing. Therefore the way forward is to set universal standards across the sector and enforce them robustly.
- Residents who are vulnerable need to be supported by specialist agencies who can target help required accurately to needs.

**1.7. Are adequate arrangements in place for the future regulation of minimum acceptable housing standards?**

- No for example, existing legislation on HMO registration is, in practical terms, unenforced by Local Authorities. Therefore the duties and standards expected of landlords must be subject to robust, practical regulation and enforcement.

- It is also clear that there are a significant number of private landlords who will not maintain or properly manage their stock without compulsion and regulation
- We believe that all rented property should be subject to minimum standards. It is accepted that this is a long term aim but the setting of condition and energy efficiency standards will not only increase the quality of the whole rented stock but also address fuel poverty and carbon emissions issues in the long term.
- It is also felt that private landlords should be required to register or be licensed and that failure to meet improved standards should result in the withdrawal of permission to let property until failures are addressed.

**1.8. Are there local examples of innovative best practice with wider post-2010 applicability?**

- Most responsible social providers have now developed standards that exceed the Decent Homes Standard.
- We have agreed a Circle Anglia Standard for all our homes with residents and set targets for energy efficiency through minimum SAP ratings as part of our affordable warmth work.

John Daley  
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