



<b>Subject:</b>	BCC Response to the Review of the Statutory Housing Fitness Standard
<b>Date:</b>	7 <sup>th</sup> June 2016
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<b>Is this report restricted?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Is the decision eligible for Call-in?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

<b>1.0</b>	<b>Purpose of Report or Summary of main Issues</b>
1.1	In October 2012 the Department for Social Development published " <i>Facing the Future: The Housing Strategy for Northern Ireland 2012 -17</i> ". As part of the Strategy the Department committed to undertake a review of the housing fitness standard.
1.2	The Housing Fitness Standard sets in law a range of criteria a dwelling must comply with in order to be considered under law as habitable or 'fit'. The Housing Fitness Standard applies across all tenures: owner occupied, the private rented sector and all social homes. The Housing Executive and, specifically in the case of the private rented sector, Councils have responsibility for the enforcement of the housing fitness standard. These enforcing authorities have a range of powers to take appropriate action where unfit housing is identified.
1.3	As part of its review the Department has produced a pre-consultation discussion document and associated policy screenings that outline the current statutory standard, explore the shortcomings within the existing arrangements and set out potential options for future change. Through the discussion document, the Department is seeking to gauge views on a range of issues including the future content of a new housing fitness requirement and the potential cost implications of changing the housing fitness standard. In particular, the Department is interested in any evidence that respondents can provide on the potential

	practical, social and financial impacts the proposed changes would have on them as individuals or organisations.
1.4	Members will recall in January 2016 this Committee approved a response to a DSD Consultation Paper 'Review of the Role and Regulation of the Private Rented Sector (PRS).' The City Council response advocated the introduction of the Housing Health & Safety Rating System (HHSRS) as the fitness standard for Northern Ireland. This current consultation seeks views on two possible options, the HHSRS or an enhanced/augmented version of the existing standard to address 5 additional risks. The consultation also seeks views on grant assistance to tackle Housing unfitness.
1.5	The consultation document can be accessed via this link <a href="https://www.communities-ni.gov.uk/publications/review-housing-fitness-standard">https://www.communities-ni.gov.uk/publications/review-housing-fitness-standard</a> . The Department intend to hold a further consultation on their preferred option.
<b>2.0</b>	<b>Recommendation</b>
2.1	The Committee is asked to consider and endorse the draft response.
<b>3.0</b>	<b>Key Issues</b>
3.1	<p>The Council welcomes the opportunity to respond to the Departments review of the Statutory Minimum Standard for all tenure contained in its discussion paper (March 2016). It has been widely acknowledged by many stakeholders that the current statutory standard is no longer fit for purpose and that changes should be made. The standard of housing impacts on all sectors of the community. Evidence suggests that:</p> <ul style="list-style-type: none"> <li>▪ Poor housing conditions have a detrimental impact on health, costing the NHS at least £600 million per year. (BRE 2010) Nicol, S. et al., <i>Quantifying the cost of poor housing</i>, BRE press, 2010</li> <li>▪ Research based on the various sources of housing and health data suggests that poor housing is associated with increased risk of cardiovascular diseases, respiratory diseases and depression and anxiety (Marmot review 2010)</li> <li>▪ Accidents - 45% of accidents occur in the home and accidents are in the top 10 causes of death for all ages.</li> <li>▪ Cold - cold homes are linked to increased risk of cardio-vascular, respiratory and rheumatoid diseases, as well as hypothermia and poorer mental health. There were</li> </ul>

an estimated 36,450 excess winter deaths attributable to all causes in England and Wales in 2008/09

- The elderly are particularly at risk from accidents in the home and excess cold .

3.2 The existing standard is a checklist of physical defects that can/may affect health. Unlike the HHSRS it is not risk based and does not allow for the quantification of risk or measurement of the impact of a hazard on the occupant of a dwelling and society as a whole.

3.3 Any enhanced/Augmented version would have these same deficiencies. It would remain a checklist of defects that may affect health. It would lack an 'outcome focus' and will not take account of all the hazards faced in the home or of the person(s) occupying that home. There is also no indication given as to how risk and impact will be quantified during an inspection. A copy of the enhanced/augmented standard can be found in Appendix 2.

3.4 The HHSRS has been in place in England & Wales since 2006 and has an abundance of technical guidance, I.T. support packages and tribunal decisions to assist the officer through the change process of moving from one standard to another. The advantages of using the HHSRS are outlined in more detail in the draft response.

3.5 The HHSRS is a measurable, quantitative standard which does not rely on the assessing officer's subjective opinion. This ensures clarity in the decision making process for landlords, tenants and other stakeholders.

3.6 Councils in England and Wales work with a range of partnerships with Primary Care Trusts, Department of Health, Home Improvement Agencies using the HHSRS to target grant aid and other financial assistance.

3.7 The Council, through its enforcement of the Private Tenancies Order and Clean Neighbourhoods and Environment Act, has a critical role to play in ensuring that all dwellings are adequately assessed to ensure that everyone lives in a safe and healthy home.

3.8 The Council's Community Plan or the Belfast Agenda will seek to ensure that health inequalities in the City are reduced and that everyone can live in safe neighbourhoods with good housing facilities. The Council wish to advocate an outcome based approach to

	<p>ensure that all people living in Belfast experience good health and wellbeing. Community Planning in NI provides the opportunity for partners to investigate the links between poor housing and health, estimate the problem and consider what intervention(s) would be the most sustainable and effective way of dealing with the issues found. Of the two options proposed the HHSRS is the only option that currently supports an outcomes based approach.</p> <p><b><u>Financial &amp; Resource Implications</u></b></p>
3.9	<p>The review may result in new regulations and additional responsibilities for Councils. It is unclear whether any additional resources will be made available to Councils for these.</p> <p><b><u>Equality or Good Relations Implications</u></b></p>
3.10	<p>There are no relevant equality considerations associated with the delivery of the strategy</p>
<b>4.0</b>	<b>Appendices – Documents Attached</b>
4.1	<p>Appendix 1 - Draft response</p> <p>Appendix 2 - Enhanced/augmented fitness standard.</p>