

Agenda for Housing Review Board Thursday, 31st July, 2025, 10.00 am

Members of Housing Review Board

T Wang, R Dale, R Browne, A Bailey, C Burhop, S Chamberlain (Chair), M Martin, S Smith (Vice-Chair), S Clarke, R Robinson, T Dumper, H Parr and K Bloxham

Venue: Council Chamber, Blackdown House, Honiton, EX14 1EJ

Contact: Alethea Thompson;

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(or group number 01395 517546)

Tuesday, 22 July 2025



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- 1 Minutes of the previous meeting (Pages 3 - 8)
- 2 Apologies
- 3 Declarations of interest
Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)
- 4 Public speaking
Information on [public speaking](#) is available online
- 5 Matters of urgency
Information on [matters of urgency](#) is available online
- 6 Confidential/exempt item(s)
To agree any items to be dealt with after the public (including the press) have been excluded. There is one item which officers recommend should be dealt with in this way.
- 7 Housing Review Board forward plan (Pages 9 - 10)
- 8 Housing staffing update (Pages 11 - 13)
- 9 Finance report (Pages 14 - 21)
- 10 Review of Anti Social Behaviour Policy (Pages 22 - 44)
- 11 Review of Electrical Safety Policy (Pages 45 - 55)
- 12 Review of Housing Repairs Policy & Awaab's Law (Pages 56 - 71)
- 13 Review of Radon Policy (Pages 72 - 85)

- 14 Quarterly performance report - Quarter 1 Tenancy Services (Pages 86 - 94)
- 15 Quarterly performance report - Quarter 1 Property & Assets (Pages 95 - 102)
- 16 Stock condition survey report (Pages 103 - 110)
- 17 Housing Revenue Account Business Plan update report (Pages 111 - 120)
- 18 Build & Buy - A housing investment and delivery plan for East Devon (Pages 121 - 136)
- 19 Exclusion of the press and public
RESOLVED: that under Section 100(A) (4) of the Local Government Act 1972 the public (including the press) be excluded from the meeting as exempt information, of the description set out in the agenda is likely to be disclosed and on balance the public interest is in discussing these items in private session (Part B).
- 20 Build and Buy Plan: Acquisitions and preliminary site-specific proposals (Pages 137 - 154)

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Members of the public exercising their right to speak during Public Question Time will be recorded.

[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

**Minutes of the meeting of Housing Review Board held at Council Chamber,
Blackdown House, Honiton, EX14 1EJ on 24 April 2025**

Attendance list at end of document

The meeting started at 10.00 am and ended at 12.05 pm

39 Minutes of the previous meeting

The minutes of the meeting held on 30 January 2025 were agreed.

40 Declarations of interest

Declarations of interest.

Councillor Aurora Bailey, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.

Councillor Brian Bailey, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.

Councillor Sarah Chamberlain, Affects Non-registerable Interest, Employed by Exeter City Council in the housing department.

Declarations of interest.

Councillor Steve Gazzard, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.

Rachel Browne, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.

Rob Robinson, Affects Non-registerable Interest, Tenant of East Devon District Council.

Declarations of interest.

Rosemary Dale, Affects Non-registerable Interest, Tenant of East Devon District Council.

41 Public speaking

There were no members of the public registered to speak.

42 Matters of urgency

There were none.

43 Confidential/exempt item(s)

There were none.

44 Housing Review Board forward plan

The Director – Housing and Health presented the forward plan and advised members that the forward plan acted as a reminder of agenda items to come forward to future meetings. The forward plan had been derived from previous meetings and requests, as well as the housing service plan. Service managers were currently reviewing realistic timeframes against each topic. Members were reminded that they could add further reports and topics for discussion to the next forward plan by either informing herself or the Democratic Services Officer

The Director – Housing and Health advised the Board that the report on the Housing Asset Management Strategy had been delayed due to the pre-election period. A report on the 30-year business plan and the asset management strategy would be brought to the next meeting of the Housing Review Board. The temporary accommodation procurement and allocation policy would also be brought to the next HRB meeting.

In response to a question about Local Government Reorganisation the Director of Housing and Health replied that at present it was unknown what the new structure would look like. There were currently three stock holding authorities within Devon. Residents would be communicated with when there was greater clarity.

45 **Housing staffing update**

The Assistant Director – Housing (Regulated Services)'s report provided the Board with key staffing updates on the housing service. An up-to-date structure chart for key roles and service management across the housing service was included with the agenda papers and explained by the Assistant Director – Housing (Regulated Services).

The Assistant Director – Housing (Regulated Services) introduced the newly recruited Corporate Lead for Housing Property and Assets and welcomed him to the meeting. With the appointment made, officers were now beginning the process of recruiting permanently to other posts within the property and assets teams to help bring further stability and permanence to the teams and service area.

It was noted that there were currently 12 vacancies across the Housing Service that fell within the Housing Revenue Account (HRA). Some of the roles were out for active recruitment, some were occupied by interim staff whilst work was undertaken to review the role or permanently recruit, and others were under consideration for removal from the structure to support with savings and efficiencies.

In response to a question about total staff numbers within the HRA the Assistant Director – Housing (Regulated Services) explained that it was difficult to provide an exact figure but estimated it to be around 90. There were over 140 staff within the housing directorate, including statutory services. The system would allow for a breakdown of staff numbers, but this interpretation of data required some time. A request was made for staff names to be included alongside the structure chart job roles but the Director of Housing and Health explained that individual names were removed from the public domain so that teams/mailboxes were used rather than individual contacts, and to negate any risk to staff.

RESOLVED: that the Housing Review Board note the contents of the housing service staffing update report.

46 **Housing performance report - quarter 4**

The Housing Review Board were presented with key performance indicators (KPIs) for quarter four of 2024/25. It was noted that at the time of writing the report not all year end activities had closed and therefore some of the data was partial or subject to change once the year end activities were completed. The end of year complaints data would be reported in July. The Assistant Director Housing (Regulatory Services) gave a presentation which summarised the performance and actions being taken to improve performance, and gave some examples of successful planned works, adaptations and accessible homes.

The service was in a strong position and had demonstrated incredible movement from the previous years' performance.

- Void loss was just 0.1% above target.
- The median number of days taken to relet a home had more than halved.
- Contractors had completed over 14,500 reactive repairs in Council homes.
- A priority focus for 2025/26 would be the improvement in completing jobs within target timescales.
- Rentals continued to achieve sector leading outcomes, despite the economic climate and cost of living crisis facing residents.
- Income collection was excellent, with arrears at just 1.36%.
- Rental support had helped tenants access food bank vouchers, electricity vouchers, white goods and discretionary housing payments.
- 25 cases were referred through the partnership with Homemaker Southwest, resulting in £95,502.97 of financial help for tenants and 2 evictions prevented.
- Major refurbishments projects had been undertaken.
- 478 adaptations to tenants' homes were completed in 2024/25.
- Improvements in all but one tenant satisfaction category.
- Complaint handling required improvement but additional resource had been brought in to support the complaints team and an incredible shift in performance was already being seen.

During his presentation the Assistant Director Housing (Regulatory Services) highlighted the Involved Devon Event which took place in March and focussed on 2 main topics selected by tenants; anti-social behaviour and the cost of living crisis. Involved Devon was a networking group of professionals working in tenant engagement for social landlords, sharing best practice, ideas and resources, and delivering training and events. The learning from the event would help inform the work that involved tenants carried out in their roles on the tenant scrutiny and participation groups.

During discussion the following points were raised:

- Reusing outgoing tenants carpets/flooring where possible.
- Discrepancy of data with contractors' data. Both sets of teams were working closely together to resolve this.
- Concern that tenants may not know subcontractors were working for EDDC if they did not display branding. All contractors had ID and tenants should be aware of a visit as an appointment would have been made.
- Since the introduction of the member enquiry form there had been a reduction in the number of complaints being received directly by officers. Complaint numbers were being monitored.
- Compliance was at almost 100% across the board. There was just one property with an outstanding electrical check.

The Assistant Director Housing (Regulatory Services) thanked all the housing service teams for the incredible journey over the past year. Members present also thanked staff for all the service improvements, despite having less finances. A request was made for

scrutiny of performance two years ago in order to reflect back and learn lessons. The Assistant Director Housing (Regulatory Services) replied that he thought that the improvement in performance despite having less staff and spending less could be attributed to a number of processes including reorganising functions, teams coming together and working really hard, and a change of staffing. There was a new set of operational controls which allowed the budget to be managed well.

On behalf of the Board the Chair thanked the Assistant Director Housing (Regulatory Services) for his presentation and congratulated all those involved with the housing service.

RESOLVED: that the Housing Review Board note performance at the end of quarter 4, 2024/25.

47 **Resident involvement strategy - progress on objectives**

The Community Team Manager's report provided the Board with an assessment of progress made against the strategic priorities identified in the Resident Involvement Strategy (RIS) since it was adopted by Cabinet in January 2024. The strategy was produced after extensive consultation with staff, stakeholders, involved tenants and non-involved tenants and included focus groups, interviews and online surveys. There were currently 72 involved tenants and at least nine different ways, including Resident Involvement panels and groups to help residents' voices be heard.

Some of the key messages from the consultation were:

- A more diverse of residents needed to be involved.
- A need to increase the variety of ways for residents to get involved.
- The focus of formal resident involvement groups needed to improve.
- Performance information and reports needed to be presented to residents in a clear and concise format.
- Training needs for involved residents should be identified and met.
- More attractive incentives should be offered to involved residents.

The Resident Involvement Strategy 2023 -2027 outlined 5 main objectives, linked to 28 aims. The strategy set out an ambitious programme of work to be delivered over three years. The five objectives were:

1. To understand more about the people who live in our homes.
2. To improve the value of our tenant engagement.
3. To increase the diversity of our involved tenants.
4. To improve our communication and consultation with tenants.
5. To value our involved tenants, volunteers, and communities.

Significant areas of progress against these 5 objectives were outlined in the report. One of the ways improvement was measured was via the Tenant Satisfaction Measures (TSM), which were used by the Regulator for Social Housing to measure tenant satisfaction. Improvements were being seen in some TSMs.

It was noted that Councillors weren't directly involved in the RIS but were urged to contact the Communities Team if they wanted to become involved. Members of the HRB requested more on-line pre-meetings/training opportunities.

RESOLVED: that the Housing Review Board note the contents of the report and progress made against the strategic priorities and objectives outlined in the Resident Involvement Strategy.

48 **Housing policy review - Succession policy**

The Housing Review Board were asked to approve the updated housing succession policy. The policy had been reviewed and updated and a new section had been added to the housing succession policy to incorporate guidance on tenancy assignments to add clarity to this area. This was felt necessary due to the number of assignments the housing allocations team had processed. It was noted that over the past two years the housing allocations team processed an average of 41 succession requests per year and 21 assignments.

In response to a question the Housing Solutions Manager confirmed that claims for the right of succession were always dealt with sensitively and that if necessary an extension beyond the 28 days of death could be granted.

RECOMMENDED: that Cabinet approve the updated Housing Succession Policy.

49 **Website redesign - housing pages**

The Housing Projects Officer's report set out ongoing plans to review and improve the housing section of the EDDC website to better meet the needs of council tenants and residents of East Devon. The housing section of the EDDC website would be redesigned to improve accessibility for tenants and streamline the pages to make navigating the site easier and quicker for tenants and residents. The 'existing council tenants' section would be prioritised initially.

A project team had been set up to develop and deliver the improvement plan and officers intended to work with tenants and staff throughout the project. HRB members were also invited to participate in this and were encouraged to become involved.

RESOLVED: that the Housing Review Board note the report.

50 **Annual report of the Housing Review Board**

The Chair presented the annual report of the Housing Review Board which summarised and highlighted the diverse range of issues covered by the Board over the year. The report gave an overview of the achievements of the Board and celebrated the progress that had been made. The Chair thanked all those involved with housing and the Housing Review Board for their outstanding work and dedication, and huge efforts in improving the service.

RECOMMENDED: that Cabinet and Council note the work that the Housing Review Board has undertaken during the 2024-25 civic year.

Attendance List

Board members present:

Councillor Aurora Bailey

Councillor Sarah Chamberlain (Chair)

Councillor Melanie Martin
Councillor Simon Smith (Vice-Chair)
Sara Clarke, Independent Community Representative
Rob Robinson, Tenants
Councillor Tim Dumper
Rachel Browne, Tenant
Rosemary Dale, Tenant

Councillors also present (for some or all the meeting)

B Bailey
I Barlow
R Collins
S Gazzard
D Ledger
S Westerman

Officers in attendance:

Sarah James, Democratic Services Officer
Alethea Thompson, Democratic Services Officer
Darren Hicks, Interim Tenancy Services Manager (Regulated Services)
Andrew King, Assistant Director for Housing (Regulated Services)
Andi Loosemore, Rental Manager
Andrew Mitchell, Housing Solutions Service Manager
Liam Reading, Assistant Director - Housing Programmes, Investment and Development
Catrin Stark, Director of Housing and Health
Anita Williams, Principal Solicitor (Deputy Monitoring Officer)
Nathan Muggeridge, Corporate Lead for Housing Property and Assets

Councillor apologies:

Councillor Christopher Burhop
Councillor Jenny Brown

Chairm

Date:

Housing Review Board Forward Plan

| Proposed date | Topic |
|-----------------|--|
| Meeting 1 25/26 | <p>1 - Staffing and Recruitment Update (<i>standing item</i>)</p> <p>2 - Finance Report (<i>standing item</i>)</p> <p>3 - Review of ASB Policy</p> <p style="padding-left: 20px;">3.1 - Appendix A – ASB Policy July 2025</p> <p style="padding-left: 20px;">3.2 - Appendix B – EIA for ASB Policy</p> <p>4 - Review of Electrical Safety Policy Updates</p> <p style="padding-left: 20px;">4.1 – Appendix A – Electrical Safety Policy</p> <p>5 - Repairs Policy & Awaabs Law</p> <p style="padding-left: 20px;">5.1 - Appendix A - Repair Policy - June 25</p> <p>6 - Review of New Radon Policy for Housing</p> <p style="padding-left: 20px;">6.1 – Appendix A – Radon Policy for Housing 2025</p> <p>7 - Performance Report for Quarter 1 of 25/26 – Tenancy Services (<i>standing item</i>)</p> <p>8 - Performance Report for Quarter 1 of 25/26 – Property & Assets (<i>standing item</i>)</p> <p>9 - Stock Condition Report</p> <p>10 - HRA Business Plan Update</p> <p>11 – PART A – Build and Buy Report</p> <p style="padding-left: 20px;">11.1 – The Build & Buy Plan</p> <p><u>PART B</u></p> <p>12 – PART B – Build and Buy Report (Part two)</p> |
| Meeting 2 25/26 | <p>Performance Report for Quarter 2 of 25/26 – Property & Assets (<i>standing item</i>)</p> <p>Performance Report for Quarter 2 of 25/26 – Tenancy Services (<i>standing item</i>)</p> <p>Staffing and Recruitment Update (<i>standing item</i>)</p> <p>Finance Report (<i>standing item</i>)</p> <p>Review of Domestic Abuse Policy</p> <p>Tenant's Annual Report</p> <p>Five-year investment and delivery plan (housing delivery 2024- 2029)</p> <p>Housing Asset Management Strategy Update</p> <p>Housing Complaints Performance and Action Plan</p> |
| Meeting 3 25/26 | <p>Performance Report for Quarter 3 of 25/26 – Property & Assets (<i>standing item</i>)</p> <p>Performance Report for Quarter 3 of 25/26 – Tenancy Services (<i>standing item</i>)</p> <p>Staffing and Recruitment Update (<i>standing item</i>)</p> <p>Finance Report (<i>standing item</i>)</p> |

| | |
|--|--|
| Meeting 4 25/26 | Performance Report for Quarter 4 of 25/26 – Property & Assets (<i>standing item</i>) Performance Report for Quarter 4 of 25/26 – Tenancy Services (<i>standing item</i>) Staffing and Recruitment Update (<i>standing item</i>) Finance Report (<i>standing item</i>) Review of the Contract with StreetScene Services for Estate Management |
| Meeting TBC | |
| TBC/ Meeting 2 | Review and Replacement of Home Safeguard Equipment within Housing Stock. |
| TBC/ Meeting 2 | Review and Implementation of digital capabilities for tenants. |
| TBC/ Meeting 3 | Investment plan for Housing Revenue Account play-sites |
| TBC/ Meeting 3 | Management of leasehold properties and service charges |
| TBC/ Meeting 2 | Sheltered Housing Review |
| Workshops / Briefings Requested for HRB Members | |
| Q2 | Workshop on Sheltered Housing Review |
| Note that following the recommendations from the Centre of Governance and Scrutiny Report- the forward plan for this Committee will be aligned to the forward plans for other Scrutiny Committees and this will then link directly into the Cabinet Forward Plan. All above topics will then be aligned to the most appropriate meeting. Review/creation of Policy and Strategy documents as required will also appear on the Forward Plan. | |



Report to: Housing Review Board

Date of Meeting 31 July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Housing Staffing Update – July 2025

Report summary:

This report provides key staffing updates for the Housing Service, and provides an up-to-date structure chart for key roles and service management across the Housing Service.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

(1) That the Housing Review Board note the content of this report.

Reason for recommendation:

This report is for noting only; no decisions required.

Officer: Andy King, Assistant Director for Housing (Regulatory Services)

Portfolio(s) (check which apply):

- ☐ Climate Action and Emergency Response
- ☐ Coast, Country and Environment
- ☐ Council and Corporate Co-ordination
- ☐ Communications and Democracy
- ☐ Economy
- ☐ Finance and Assets
- ☐ Strategic Planning
- ☒ Sustainable Homes and Communities
- ☐ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

.

Climate change Low Impact

Risk: Low Risk; N/A

Links to background information N/A

Link to [Council Plan](#)

Priorities (check which apply)

- ☐ A supported and engaged community
 - ☐ Carbon neutrality and ecological recovery
 - ☐ Resilient economy that supports local business
 - ☒ Financially secure and improving quality of services
-

Report in full

1. Recruitment Update

- 1.1. In our previous update, we noted that with our Corporate Lead for Housing Property & Assets in post, we will now be moving forward with recruitment to other critical roles within the Property & Assets teams. This recruitment is live and ongoing, and includes:
 - Compliance Manager
 - Repairs Service Manager
 - Senior Surveyor
 - Heating Compliance Surveyor
 - Maintenance and Planned Works Surveyors
- 1.2. These are roles that bring further resource and resilience into our Housing Property & Assets Team and will ensure manageable scope and areas of responsibilities. They support the Council in effective oversight and management of risk and health and safety, and will increase our ability to respond quicker to requests for surveyor visits and inspections.
- 1.3. Whilst there is currently a significant amount of recruitment taking place in our Property and Assets services, this recruitment is happening for a number of reasons:
 - 1.3.1. Les Joint, who was our interim Repairs Service Manager, left the organisation in June. Prior to his departure, Les was covering the functions and responsibilities of the Repairs Service Manager and the Compliance Manager, with support from other existing team members who have temporarily taken on additional responsibilities.
 - 1.3.2. The Senior Surveyor position is an amendment to our structure, therefore whilst this isn't a vacant resource we recognise that there is a gap in the team management and oversight that this new role is intended to bridge.
 - 1.3.3. Our Heating Compliance Surveyor post has been vacant for a couple of months now following the departure of the previous post holder. We have been fortunate that another team member holds the necessary experience and qualifications to provide interim cover in this role, and we have been extremely grateful for the additional duties he and the team administrator have taken on to ensure the core and essential functions of this post have continued to be delivered.
 - 1.3.4. The recruitment to our Maintenance and Planned Works Surveyors is twofold; some of this recruitment is to replace roles that are, or will be, vacant due to natural staff turnover (2x Maintenance Surveyors, 1x Planned Works Surveyor). We are also bringing in additional resources to reflect the increased budget and spend on planned and major works projects, and our commitment to be proactive, rather than responsive, in the delivery of our repairs services.

1.3.5. Where vacancies have occurred, we have worked hard to ensure that we use existing resources to provide cover. This can, of course, sometimes mean that the team's focus shifts to core and essential activities, but we have been conscious to balance service delivery with financial responsibility. This means that we have been able to keep agency use to a minimum (we currently only have one agency worker across all of Property and Assets) and are not using the services of any external consultants to bridge the gaps.

1.4. We have also previously informed the HRB of additional interim resource brought in to support with our housing-related complaints. This post has been covered on a casual basis over the past few months, however I am pleased to say that, as of Monday 4th August, Tanya Traylen will take up a post full time on an initial 6-month contract as our Housing Performance Lead.

Initially, Tanya will primarily be looking at our complaints processes within housing, and how we can take a more holistic approach when dealing with complaints, and how we can better understand and identify issues and problems early-on in order to support early intervention and resolution for our tenants.

Financial implications:

The staffing updates given in this report are within the approved budget

Legal implications:

There are no legal implications.

Report to: Housing Review Board

Date of Meeting 31st July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Finance Report: 2024/25 Outturn and Quarter 1 monitoring update

Report summary:

This report sets out the revenue budget and capital outturn positions at the end of the financial year 2024/25 and also provides a summary of the Housing Revenue Accounts financial position for quarter 1 2025/26.

2024/25 Outturn:

The Revised Housing Revenue Account (HRA) budget approved by Council (July 2024) agreed the use of the HRA Balance up to £1.750m in year, with the acceptance this would take the HRA Balance below its minimum adopted level of £2.1m to £1.350m, to be replenished in future years. Expenditure is being maintained within this parameter with ongoing analysis on future spending plans and projections to gain assurance on this position to financial year end.

The year end outturn on the Housing Revenue Account was per the final agreed adjusted budget, resulting in a deficit of £1.336m, reducing the HRA Balance to £1.764m.

Quarter 1 2025/26 indications:

The review of the year to date figures up to Q1 for the Housing Revenue Account shows that it is trending materially in line with the budget profile up to this point in the financial year. Therefore, there are no material revenue items to bring to the attention of members.

As is normal at this point in the financial year, Housing Capital Spend is low, as the procurement of contracts and assessment of required major works gets underway in earnest.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. That the Housing Review Board considers and recommends to Cabinet the outturn position for 2024/25 including the implications and proposals relating to the Balances and Reserves held by the Council.
2. That the Housing Review Board notes the year-to-date Housing Revenue Account position to Q1 2025.

Reason for recommendation:

To accord with the Council's financial regulations, this report presents the outturn position for the Council's approved budgets for the General Fund, Housing Revenue Account and Capital Expenditure.

The report updates Members on the overall financial position of the Authority and includes recommendations to reserve transfers and for corrective action, when required, for the remainder of the current financial year.

Officer: John Symes – Finance Manager, jsymes@eastdevn.gov.uk, 01395 517413

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☒ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☐ Sustainable Homes and Communities

Equalities impact Low Impact

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Climate change Low Impact

Risk: Low Risk; .

Links to background information -

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☒ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Report in full

Financial Outturn 2024/25

The Housing Revenue Account (HRA) is the ring-fenced account for providing Council housing and associated services. This is shown separately on Income & Expenditure Statement.

HRA Outturn

The final HRA budget and outturn was impacted by various developments in the 2024/25 financial year which have been reported to members throughout the year, with recommendations made and agreed. The following is a brief summary of these;

- The Director of Social Housing at the Ministry of Housing, Communities & Local Government announced increased Right to Buy flexibilities, the change to 100% receipt funding being the most impactful. This freed up circa £1m of approved borrowing which was used to address urgent electrical remedial work requirements.
- The initial “hold-over” budget was replaced and included within the report “Housing Revenue Account: Financial Review, Revised Budget & Sustainability Plan” which was presented and approved.
- A reduction of the HRA balance was agreed in the new budget, dropping from the upper limit of £3.1m, by £1.336m to £1.764m and adding in an ambitious capital programme, which unfortunately due to recruitment issues, was not achievable.
- The stock condition survey data was received, and a professional partner was engaged to develop the Business Plan, with a model produced and presented.
- A substantial review of the New Budget saw numerous Revenue to Capital virements to best allocate resources and funding.

The following table shows the in-year outturn variations versus the revised set budgets and approved in year adjustments for both the Housing Revenue Account and the associated Capital programmes.

| Housing Outturn 2024/25 | Original Budget £'000s | | | Revised Budget £'000s | | |
|---|------------------------|------------------|------------------|-----------------------|-------------------|-------------------|
| | Actuals | Budget | Surp/Def | Actuals | Budget | Surp/Def |
| Housing Revenue Account | 1,336,000 | 0 | 1,336,000 | 1,336,000 | 1,336,000 | 0 |
| Borrowing Requirement - Budgeted Capital Ex. less Funding | 5,302,656 | 3,300,900 | 2,001,756 | 5,302,656 | 9,190,855 | -3,888,199 |
| TOTAL | 6,638,656 | 3,300,900 | 3,337,756 | 6,638,656 | 10,526,855 | -3,888,199 |

The Variations against the set budget, incorporating in year approved budget variations, across the HRA and associated Housing capital programmes, are explained in the following pages and tables. Commentaries have been included at a summary level addressing material variations or issues which are relevant to, or have impact upon, the HRA and associated capital projects within 24/25.

| Total Revenue Summary | 24/25 Outturn | | |
|------------------------------------|------------------|------------------|----------|
| | Actuals | Budget | Surp/Def |
| 1 Rental & Other Income | -22,185,140 | -21,936,240 | -248,900 |
| 2 Revenue Expenditure | 38,737,863 | 39,308,740 | -570,877 |
| 3 Financing & Movement In Reserves | -15,216,722 | -16,036,500 | 819,778 |
| TOTAL | 1,336,000 | 1,336,000 | 0 |

NOTES

Brief Summary:

The 2024/25 Financial year has resulted in lower than anticipated spending against an ambitious budget adversely impacted by capacity issues as a result of recruitment challenges in key roles. Voids were a key area of focus, with high capital spending levels, that in turn achieved a better than expected income performance in addition to much improved Voids statistics and KPIs. Changes in Central Government Regulations in the year resulted in a reduced debt burden, even more so when combined with the capacity driven underspends, both capital and revenue, within the Property & Asset section.

| Revenue Income Category | 24/25 Outturn | | |
|-------------------------|--------------------|--------------------|-----------------|
| | Actuals | Budget | Surp/Def |
| 1 Gross Property Rents | -21,298,647 | -21,088,320 | -210,327 |
| 2 Garage Rents | -202,503 | -155,292 | -47,211 |
| 3 Other Income | -683,991 | -692,628 | 8,637 |
| TOTAL | -22,185,140 | -21,936,240 | -248,900 |

1

| Total Capital Summary | 24/25 Outturn | | |
|---|------------------|------------------|-------------------|
| | Actuals | Budget | Surp/Def |
| 1 Capital Expenditure in Year | 13,108,594 | 15,133,382 | -2,024,788 |
| 2 Capital Funding Sources | -7,805,938 | -5,942,527 | -1,863,411 |
| 2024/25 ADDITIONAL BORROWING REQUIREMENT | 5,302,656 | 9,190,855 | -3,888,199 |
| Assumed Borrowing Rate | 4.50% | 4.50% | 4.50% |
| Annual Additional Revenue Interest Cost | 238,620 | 413,588 | -174,969 |

NOTES

| Revenue Expenditure Category | 24/25 Outturn | | |
|-------------------------------------|-------------------|-------------------|-----------------|
| | Actuals | Budget | Surp/Def |
| 1 Repairs And Maintenance - General | 6,204,509 | 6,060,500 | 144,009 |
| 2 Repairs And Maintenance - Special | 541,425 | 1,023,004 | -481,579 |
| 3 Supervision & Management | 9,166,464 | 9,389,546 | -223,082 |
| 4 Other Expenditure | 1,107,317 | 1,090,344 | 16,973 |
| 5 Capital Charges & Bad Debt | 21,718,147 | 21,745,346 | -27,199 |
| TOTAL | 38,737,863 | 39,308,740 | -570,877 |

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| Capital Expenditure Category | 24/25 Outturn | | |
|--|-------------------|-------------------|-------------------|
| | Actuals | Budget | Surp/Def |
| 1a Affordable Housing - Right to Buy Funded | 1,737,255 | 1,950,316 | -213,061 |
| 1b Affordable Housing - Local Authority Housing Fund | 1,160,630 | 1,370,000 | -209,370 |
| 2 Compliance Capital Expenditure | 275,783 | 2,349,996 | -2,074,213 |
| 3 Planned Capital Programme | 2,632,796 | 2,705,924 | -73,128 |
| 4 Major Repairs | 7,302,130 | 6,757,146 | 544,984 |
| TOTAL | 13,108,594 | 15,133,382 | -2,024,788 |

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| Financing & Movement In Reserves | 24/25 Outturn | | |
|---|--------------------|--------------------|----------------|
| | Actuals | Budget | Surp/Def |
| 1 Net Interest Cost | 2,388,817 | 2,787,276 | -398,459 |
| 2 Capital Charges - MIRs | -21,752,171 | -21,752,171 | 0 |
| 3 Movement in Earmarked Reserves | -820,801 | 0 | -820,801 |
| 4 Contribution to Capital Net of Other Income | 4,967,432 | 2,928,395 | 2,039,037 |
| TOTAL | -15,216,722 | -16,036,500 | 819,778 |

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| Capital Funding Sources | 24/25 Outturn | | |
|---|-------------------|-------------------|-------------------|
| | Actuals | Budget | Surp/Def |
| 1 Ring Fenced Right to Buy Receipts | -1,735,202 | -975,155 | -760,047 |
| 2 Unringfenced Right to Buy Receipts & Capital Grants | -1,026,368 | -468,000 | -558,368 |
| 3 Major Repairs Contribution (Depreciation) | -1,836,416 | -2,028,300 | 191,884 |
| 4 Additional Capital Contribution from Revenue | -3,207,952 | -2,471,072 | -736,880 |
| TOTAL | -7,805,938 | -5,942,527 | -1,863,411 |

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1 Revenue Income

Dwelling income lost, due to void properties, has seen a significant improvement due to the focus that has been placed on their turnaround and work undertaken on the backlog that was present at the beginning of the year, resulting in a year on year reduction of £0.175m, contributing to a surplus of £50k. The residual variance equates to a 0.6% favourable outturn versus budget and is the result of continued excellent collection rates being achieved by the rentals team.

2 Revenue Expenditure - General Repairs & Maintenance

Revenue related exclusions to the Integrated Asset Management Contract are the driver of the deficit with the known element of the Price Per Property payment achieving material parity with the set budget. The majority of the deficit has been the result of works required to the fabric of and communal areas within the councils blocks, which fall outside the scope of the IAM Contract.

3 Revenue Expenditure - Special Repairs & Maintenance

The two significant areas of variation in year were compliance related and Social Service Adaptations. The compliance cost centres and works undertook a significant review in year with costs allocated to capital where applicable which previously were using revenue budget, the largest impact seen being within the Fire related building works area. The Social Service Adaptations revenue budget is provided for small works such as grab rails and the like, which saw reduced demand in 24/25.

4 Revenue Expenditure - Supervision & Management

The housing service has been significantly impacted by recruitment issues during 2024/25 which has driven a significant revenue saving in year as the costs saved through numerous posts remaining vacant more than offset the agency costs that had to be incurred to attempt to provide cover for these roles. The area most significantly impacted during 2024/25 was the Property and Assets team which also explains the teams associated underspends, particularly against their capital budgets.

5 Revenue Expenditure - Other

The revenue costs categorised as other collectively achieved a materially neutral variance. The sole outlier in year being the spend on accommodation for tenants that had to be decanted from their property due to significant works which meant they were unable to live at their address due to health and safety reasons. Costs for such accommodation within East Devon are high, specifically during holiday periods which resulted in a deficit contribution of £150k. This has been offset by savings made within the Estate Management areas, notably on clearance costs which have seen an improvement in the way they have been managed when they occur.

6 Revenue Expenditure - Capital Charges & Bad Debt

The regulations which dictate the accounting treatment of costs and charges to the Housing Revenue Account result in their inclusion within the cost of service and subsequent reversal within the movement in reserves, save for the major repairs minimum contribution to capital of the depreciation value. Therefore, the budgets for the capital charges impacting the Housing revenue Account have been adjusted to reflect the current years position, so as not to distort the other revenue costs which have a bearing on the final outturn of the account. The sole small variation being due to the reduction in bad debt provision in year.

7 Financing & MIRS - Net Interest Cost

The interest expense required to finance the borrowing within the HRA was materially in line with expectations, with only a minimal adverse variance due to rate fluctuations between budget setting and the time at which the charges were made. The significant surplus was due to the impact of Treasury Investment Income, which was predicted to be significantly lower due to rate decreases, included upon the advice of the councils treasury consultants, which did not materialise.

8 Financing & MIRS - Movement in Earmarked Reserves

At the 23/24 year end, £0.9m was kept in a revenue reserve, from the large amounts that were released, to cover the funding of the remainder of the LAHF properties for which a 10% deposit had been paid within that financial year. This reserve has been released less the residual funding that remains, also received from the Local Authority Housing Fund, which has been provided to address specific long term voids in need of significant investment.

9 Financing & MIRS - Contribution to Capital

The aforementioned surpluses created within the income and expenditure lines of the revenue account resulted in an overall surplus of £1.9m. The financial decision has been made to provide the whole surplus as a revenue contribution to capital, plus the agreed £1.336m reduction in the HRA balance, which will be replenished in subsequent years in £0.5m increments for 2 years and then restated in the year following. The rationale for this decision being to reduce the in year debt burden as much as possible while interest rates remain high, while adhering to the financial sustainability plan presented to and agreed by members.

10 Capital Expenditure - Right to Buy Affordable Housing

Right to buy related expenditure in year saw the acquisition of new build family homes, bought at a significant cost reduction, within the new Plumb Park development in Exmouth to address demand.

11 Capital Expenditure - L.A.H.F. Affordable Housing

The remaining 90% of the cost of the acquisitions agreed in the prior year of the new build properties within the Cranbrook area completed at the beginning of 2024/25.

12 Capital Expenditure - Compliance

Capital expenditure across the Property & Assets team was impacted by the staffing and recruitment issues experienced in year. Procurement experience and knowledge required for the capital contacts that were envisioned to take place in 24/25 at budget setting within the compliance area was lacking and has subsequently been addressed. The underspend has been taken as slippage to be allocated in 25/256 by the newly appointed Corporate Lead of Property & Assets.

13 Capital Expenditure - Planned Programmes

A significant portion of the Planned Maintenance Capital budget was agreed by members to be reallocated in year, to areas such as Voids & Disrepair, as there was insufficient capacity to achieve all works that were included within the budget. Spend against the residual budget was materially in line with expectations, the one outlier being unanticipated roofing replacements which was mitigated by savings in Social Service Adaptations major works.

14 Capital Expenditure - Major Repairs

Voids spend was particularly high in year, due to the need to improve upon turnaround times whilst at the same time addressing a backlog that was present at the start of the year. This has had a beneficial impact on rental income and void rates at the final quarter of the year achieved and remained at target levels. Capital works following repairs visits, due to complaints and disrepair claims also were higher than expectations, however, mitigation was seen through savings in heating upgrades and delayed major works projects due to capacity as focus was on the high demand areas.

15 Capital Funding - Ring fenced RTB Receipts

During 2024/25, Central Government made the welcome decision to further increase flexibilities with regards to right to buy receipts, with capital funding from acquisitions being able to be taken solely from Right to Buy receipts, as opposed to requiring 50% match funding. This change in regulations would have beneficially impacted the borrowing requirement by £0.9m, however, the decision was made and agreed by members in year to instead use the budget to address urgent electrical remedial works.

16 Capital Funding - Un-Ring fenced RTB Receipts

Un-ring fenced right to buy receipts were higher than anticipated, which again, due to welcome Central Government reform, allowed for the Central Share of receipts to be kept by the stock holding authorities. Circa £0.1m of Capital Grants received from the Local Authority Housing Fund were allocated against specific Long Term Voids spend in accordance with the grant conditions.

17 Capital Funding - Major Repairs - Depreciation

Depreciation charges were slightly lower than provided for at the time the budget was set, the variance is essentially inconsequential as the sole impact is to increase the other revenue contribution to capital made.

18 Capital Funding - Capital Contribution

As a result of the aforementioned revenue surpluses and funding variances, it was possible to make further capital contributions over and above those budgeted for, up to the level agreed by members, presented within the Financial Sustainability plan.

Financial Monitoring 2025/26 Quarter 1

The impact of the above 2024/25 outturn on the HRA's Reserve and Debt levels can be seen below, with the projected figures included, assuming the 2025/26 outturn position is exactly per the set budget.

| 2024/ 25 Closing | | | 2025/ 26 Projected | | |
|------------------------------------|-----------|------------|--|----------|---------|
| HOUSING REVENUE ACCOUNT - RESERVES | | | | | |
| PRIOR YEAR | | | 4Cast Outturn | | |
| Opening | Movement | Closing | Opening | Movement | Closing |
| | | | RESERVE CATEGORY | | |
| | | | USABLE REVENUE RESERVES | | |
| -3,100,000 | 1,336,000 | -1,764,000 | HOUSING REVENUE ACCOUNT GENERAL RESERVE | | |
| -982,995 | 820,801 | -162,194 | HOUSING REVENUE ACCOUNT - EARMARKED RESERVES | | |
| -4,082,995 | 2,156,801 | -1,926,194 | | | |
| | | | UN-USABLE CAPITAL RESERVES | | |
| -6,096,493 | -393,023 | -5,703,470 | RIGHT TO BUY CAPITAL RECEIPTS RESERVE | | |
| -10,179,488 | 1,763,778 | -7,629,664 | | | |

| HOUSING REVENUE ACCOUNT - BORROWING | | | | | |
|-------------------------------------|------------|-------------|-------------------|-------------|--------------|
| 2024/25 | | | 2025/26 Projected | | |
| Opening | Movement | Closing | Opening | Movement | Closing |
| DEBT CATEGORY | | | | | |
| -78,485,772 | 0 | -78,485,772 | -92,515,479 | 0 | -92,515,479 |
| -8,727,050 | -5,302,656 | -14,029,706 | 0 | -18,378,000 | -18,378,000 |
| -87,212,823 | -5,302,656 | -92,515,479 | -92,515,479 | -18,378,000 | -110,893,479 |

The year-to-date Housing Revenue Account figures, show in the table below, up to Q1 are materially in line with the profiled budget, therefore there are no concerns or issues to raise to members at this stage.

| 24/25 Outturn | | | Total Revenue Summary | 25/26 YTD @ Q1 | | |
|---------------|-------------|----------|------------------------------------|----------------|------------|----------|
| Actuals | Budget | Surp/Def | | Actuals | Budget | Surp/Def |
| -22,185,140 | -21,936,240 | -248,900 | 1 Rental & Other Income | -6,205,365 | -6,316,183 | 110,818 |
| 38,737,863 | 39,308,740 | -570,877 | 2 Revenue Expenditure | 3,956,312 | 4,009,660 | -53,348 |
| -15,216,722 | -16,036,500 | 819,778 | 3 Financing & Movement In Reserves | 0 | 0 | 0 |
| 1,336,000 | 1,336,000 | 0 | TOTAL | -6,205,365 | -6,316,183 | 57,470 |

| 24/25 Outturn | | | Revenue Income Category | 25/26 YTD @ Q1 | | |
|---------------|-------------|----------|-------------------------|----------------|------------|----------|
| Actuals | Budget | Surp/Def | | Actuals | Budget | Surp/Def |
| -21,298,647 | -21,088,320 | -210,327 | 1 Gross Property Rents | -5,414,263 | -5,503,076 | 88,813 |
| -202,503 | -155,292 | -47,211 | 2 Garage Rents | -47,872 | -69,877 | 22,005 |
| -683,991 | -692,628 | 8,637 | 3 Other Income | -743,230 | -743,230 | 0 |
| -22,185,140 | -21,936,240 | -248,900 | TOTAL | -6,205,365 | -6,316,183 | 110,818 |

| 24/25 Outturn | | | Revenue Expenditure Category | 25/26 YTD @ Q1 | | |
|---------------|------------|----------|-------------------------------------|----------------|-----------|----------|
| Actuals | Budget | Surp/Def | | Actuals | Budget | Surp/Def |
| 6,204,509 | 6,060,500 | 144,009 | 1 Repairs And Maintenance - General | 1,187,054 | 856,666 | 330,388 |
| 541,425 | 1,023,004 | -481,579 | 2 Repairs And Maintenance - Special | 72,316 | 443,418 | -371,102 |
| 9,166,464 | 9,389,546 | -223,082 | 3 Supervision & Management | 2,422,642 | 2,429,174 | -6,533 |
| 1,107,317 | 1,090,344 | 16,973 | 4 Other Expenditure | 274,300 | 280,401 | -6,101 |
| 21,718,147 | 21,745,346 | -27,199 | 5 Capital Charges & Bad Debt | 0 | 0 | 0 |
| 38,737,863 | 39,308,740 | -570,877 | TOTAL | 3,956,312 | 4,009,660 | -53,348 |

| 24/25 Outturn | | | Financing & Movement In Reserves | 25/26 YTD @ Q1 | | |
|---------------|-------------|-----------|---|----------------|--------|----------|
| Actuals | Budget | Surp/Def | | Actuals | Budget | Surp/Def |
| 2,388,817 | 2,787,276 | -398,459 | 1 Net Interest Cost | 0 | 0 | 0 |
| -21,752,171 | -21,752,171 | 0 | 2 Capital Charges - MIRs | 0 | 0 | 0 |
| -820,801 | 0 | -820,801 | 3 Movement in Earmarked Reserves | 0 | 0 | 0 |
| 4,967,432 | 2,928,395 | 2,039,037 | 4 Contribution to Capital Net of Other Income | 0 | 0 | 0 |
| -15,216,722 | -16,036,500 | 819,778 | TOTAL | 0 | 0 | 0 |

Financial implications:

Contained in the report.

Legal implications:

Any legal implications are identified in the report and no further comment is required.

Report to: **Housing Review Board**

Date of Meeting: 31st July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Housing Policy Review: Anti-Social Behaviour Policy

Report summary:

The Anti-Social Behaviour Policy has been reviewed and Housing Review Board approval is being sought.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

(1) The Housing Review Board to recommend to Cabinet that they approve the proposed updated ASB Policy.

Reason for recommendation:

That the Council has an up to date policy ensuring that anti-social behaviour is managed effectively.

Officer: Darren Hicks, Tenancy Services Manager (Regulated Services)

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact High Impact

.

Climate change Low Impact

Risk: Low Risk

Links to background information N/A

[Link to Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☐ Carbon neutrality and ecological recovery
 - ☐ Resilient economy that supports local business
 - ☐ Financially secure and improving quality of services
-

Report in full

- 1.1. The Anti-Social Behaviour policy has recently been reviewed and updated and is included as ***'Appendix A – ASB Policy Final July 2025'***.
- 1.2. Not only is our management of anti-social behaviour (ASB) something covered under legislation and the Housing Act, it is also a moral duty of our housing service to support tenants with their right to the peaceful enjoyment of their homes.
- 1.3. Whilst the rights and responsibilities of our tenants is outlined in our tenancy agreements, it is also important that we have a policy that outlines how we manage reports of ASB, support tenants to resolve disputes, and how we work in partnership across the district to not only support our tenants, but also the wider communities in which we operate.
- 1.4. Any amendments to the policy have been listed in the policy document, and extracted below. Of particular note, new sections have been added to the policy to incorporate guidance on Public Sector Equality Duties, providing a more proactive service through inspections and visits and on behaviours not treated as ASB:

| Date | Section | Change | Origin of change (eg change in legislation) |
|----------------|---------|---|--|
| 31st July 2025 | 1.2 | Wording change | Wording |
| 31st July 2025 | 1.4 | Included reference to Public Sector Equality Duties | Equality Act 2010 |
| 31st July 2025 | 3.5 | Section added to incorporate tenancy sustainment where possible | Additional Section |
| 31st July 2025 | 3.6 | Section added to incorporate tenancy sustainment where possible | Additional Section |
| 31st July 2025 | 6.1 | Section added to evidence proactive | Additional Section |

| | | | |
|----------------|------|--|--------------------|
| | | measures in dealing with ASB | |
| 31st July 2025 | 7.5 | Section added to include regard to victim and perpetrators vulnerabilities | Additional Section |
| 31st July 2025 | 7.5 | Section added to ensure complaints are updated | Additional Section |
| 31st July 2025 | 7.9 | Section amended to include reference to EDDC Tenancy Agreement | Wording |
| 31st July 2025 | 7.17 | Section added regarding behaviour that is not considered ASB | Additional Section |

1.5. Internal and external consultation has been carried out during the process of reviewing the policy. Residents have been consulted through an online 'Commonplace' survey, and a series of ASB Focus Groups were held during the week commencing the 16th June 2025.

1.6. Once approved, a communications plan will be drafted and implemented to ensure the Policy, and key summary of it, is communicated clearly to our tenants (balancing both the need to make tenants aware of their responsibilities, alongside what they can expect from us as their landlord and clarity around definitions of anti-social behaviour).

Financial implications:

It is assumed from the changes made that there are no financial implications. RW

Legal implications:

Landlord's handling of ASB cases and our duties is outlined in the Housing Act, the Equality Act (public sector equality duty), and other relevant legislation and case law. This revised policy strengthens our approach to ASB management in our regulated housing services. It is acknowledged that ad hoc reviews will be required during the lifecycle of the policy in response to legislative changes and learning from case law and best practice. AW

Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes and other resources, available on the [intranet](#)



| | | | |
|---|--------------|-----------------------|------------------|
| Version | Final | Date Completed | June 2025 |
| Description of what is being impact assessed | | | |
| Assessing the impact of the revised 'Anti-Social Behaviour Policy (Housing)'. | | | |
| Evidence | | | |
| What data/information have you used to assess how this policy/service might impact on protected groups? | | | |
| <p>The policy draws on the council's public sector equality duty under section 149 of the Equality Act 2010. This ensures that we have due regard for the vulnerabilities and protected characteristics of both victims and perpetrators of anti-social behaviour, and that we ensure any action or response is proportionate to the severity, impact and frequency of the ASB. Early intervention, mediation, and support for both victims and perpetrators is central to our approach. Where legal action is necessary, Equality Impact Assessments (including public sector duty) are imbedded into the process and cases cannot proceed without this.</p> | | | |
| Who have you consulted with to assess possible impact on protected groups and what have they told you? If you have not consulted other people, please explain why? | | | |
| <p>Open consultation and targeted focus group consultation has been completed with our tenants who are impacted by the implementation of this policy. Our tenants have told us that it is important to them that they receive a good service when it comes to anti-social behaviour, and that any vulnerabilities or support needs are taken into account when we are assessing the severity and impact of any reported case. They have also acknowledged that the needs and vulnerabilities of any alleged perpetrators of ASB also need to be considered, and that appropriate supportive interventions are put in place in the first instance to address behaviours that are causing a nuisance to neighbours.</p> | | | |

| Analysis of impact on protected groups | | | | |
|--|---|------------------|-----------------|------------------|
| <p>The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. The Council also has a legal duty to have due regard to armed forces personnel when carrying out healthcare, housing and education functions. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, assess the likely outcome, before you have implemented any mitigation.</p> | | | | |
| Protected group | Summary of impact | Negative outcome | Neutral outcome | Positive outcome |
| Age | <ul style="list-style-type: none"> Older tenants are more likely to be digitally isolated, which can make it difficult to engage with some of the ASB tools at our disposal (i.e. sound recording equipment and phone apps). In these cases, we can utilise written diary logs, but it is acknowledged that these have less weight as evidence in legal proceedings. However, we provide full in-person demonstration of equipment use. We recognise that some behaviours can be more intimidating for older tenants, particularly if they live alone. The policy is clear on what constitutes anti-social behaviour, and victim impact statements support our understanding of the impact of the ASB on a case-by-case basis and, therefore, the proportionality of the resulting actions and interventions. There is no upper or lower age limit to being a victim or perpetrator of anti-social behaviour, but we recognise that approaches may need to be tailored dependant on the age group we are working with. | □ | □ | ☒ |
| Disability | <ul style="list-style-type: none"> It is estimated that 26% of the UK population is living with a form of disability. | □ | □ | ☒ |

| | | | | |
|--|---|--|--|--|
| | <ul style="list-style-type: none"> • Experiencing ASB as a disabled person can exacerbate existing vulnerabilities and compound social isolation. Disabled individuals may be disproportionately affected by harassment, intimidation, and victimisation due to factors such as increased susceptibility and communication barriers. Therefore, our policy sets out proportionality to ensure our actions and interventions are appropriate to the level of impact and distress experienced by the victim. • Equally, proportionality supports us in our response to complaints against someone with a disability (i.e., noise nuisance may genuinely be experienced by a neighbour, but the source of that noise is the result of someone's disability). The approach outlined in our Policy allows us to be nuanced and tailor our approach to each case on its merits. • People with mental health conditions and other cognitive diagnosis may, in some cases, find it more difficult to understand the impact their behaviours have on their neighbours, or indeed to understand their rights and responsibilities. To mitigate this, we provide clarity through our tenant welcome packs and our website, and can provide this information in alternative formats. We also work closely with support providers and mental health services, making use of Capacity Assessments where necessary. • To support disabled victims and perpetrators of ASB, we ensure that we understand accessibility needs, provide tailored communication options, implement personalised actions plans, co-ordinate with external partners and support agencies, and take a holistic and multi-agency approach. • Our housing system enables us to record ASB that is specifically related to hate crimes. | | | |
|--|---|--|--|--|

| | | | | |
|---------------------------------------|---|--------------------------|-------------------------------------|-------------------------------------|
| Gender reassignment | <ul style="list-style-type: none"> • Trans people are disproportionately affected by harassment, intimidation, and victimisation with an 11% increase in recorded hate crimes in 2023. Therefore, we know that tenants who are transgender are statistically more likely to experience ASB, particularly in the form of hate crime. • Our policy sets out our approach to assessing and understanding the impact ASB has on a case-by-case basis, and our partnership work with the Police and other local support agencies to ensure timely intervention and support. • Where a tenant is in danger due to being a victim of a hate crime, supplementary policies and processes can support us with providing additional security, or alternative accommodation if need be. We can also utilise emergency injunctive proceedings where a perpetrator poses a physical risk to a victim. • Our housing system enables us to record ASB that is specifically related to hate crimes. This allows us to regularly review such cases, the outcomes, and take learnings for future case management and intervention. • The existence of this Policy, the outlined approach to tackling ASB, ensures that we are putting protections in place for all tenants who may experience ASB. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Marriage and civil partnership | <ul style="list-style-type: none"> • There are no identified direct impacts in respect of marriage and civil partnership. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

| Protected group | Summary of impact | Negative outcome | Neutral outcome | Positive outcome |
|--------------------------------|---|--------------------------|-------------------------------------|-------------------------------------|
| Pregnancy and maternity | <ul style="list-style-type: none"> There are no identified direct impacts in respect of pregnancy and maternity. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Race and ethnicity | <ul style="list-style-type: none"> Racial hate crimes accounted for 70% of recorded offences in 2023. Whilst this was a 5% decrease from the previous year, it is undeniably the biggest motivation for hate related crimes. Therefore, it stands to reason that racial hate can be a key driving factor behind anti-social behaviour, even if this is not a clear motivation it puts people from racial and ethnic minorities at a higher risk of experiencing ASB from their neighbours. The proportionality element of our ASB procedure is key in ensuring that we work with victims to fully understand the impact of the ASB and adjust our approaches and response accordingly. Information about our service delivery, policies, and procedures can be provided in varying formats and languages to ensure that people who do not speak English as their first language are still able to access and understand the services available to them. We also use interpreters when required, ensuring victims (and indeed alleged perpetrators) are able to fully engage in process. Our housing system enables us to record ASB that is specifically related to hate crimes. This allows us to regularly review such cases, the outcomes, and take learnings for future case management and intervention. The existence of this Policy, the outlined approach to tackling ASB, ensures that we are putting protections in place for all tenants who may experience ASB. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| Protected group | Summary of impact | Negative outcome | Neutral outcome | Positive outcome |
|---------------------------|---|--------------------------|-------------------------------------|-------------------------------------|
| Religion or belief | <ul style="list-style-type: none"> ASB can involve offences or hate crimes specifically related to a person's religion or belief. Equally, a person may be accused of ASB but the behaviour could be a result of a religion or belief (such as prayer or practices outside of socially accepted hours). Therefore, this may need to be taken into consideration when addressing such allegations and the proportionate and appropriate response. Our policy holds a strong focus on proportionality and assessment of the individual nuances of each case, ensuring a person-centred and holistic approach is taken. Our housing system enables us to record ASB that is specifically related to hate crimes. This allows us to regularly review such cases, the outcomes, and take learnings for future case management and intervention. The existence of this Policy, the outlined approach to tackling ASB, ensures that we are putting protections in place for all tenants who may experience ASB. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Sex | <ul style="list-style-type: none"> ASB can be experienced and perpetrated by people of all genders. The policy covers all genders, and therefore access to services is not affected by gender. Furthermore, our person-centred and holistic approach ensures we take in to account each person's individual needs, whatever characteristic these needs arise from, and we tailor our approach accordingly. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Sexual orientation | <ul style="list-style-type: none"> 22,839 hate crimes were reported in 2023 in relation to sexual orientation. We know that members of the LGBTQ+ community are disproportionately more likely to experience hate crime, abuse, and threatening behaviour. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| Protected group | Summary of impact | Negative outcome | Neutral outcome | Positive outcome |
|---|---|------------------|-----------------|------------------|
| | <ul style="list-style-type: none"> Therefore, we know that LGBTQ+ tenants are more likely to experience hate-related/aggravated ASB in their homes. Our policy holds a strong focus on proportionality and assessment of the individual nuances of each case, ensuring a person-centred and holistic approach is taken. Our housing system enables us to record ASB that is specifically related to hate crimes. This allows us to regularly review such cases, the outcomes, and take learnings for future case management and intervention. The existence of this Policy, the outlined approach to tackling ASB, ensures that we are putting protections in place for all tenants who may experience ASB. | | | |
| Armed Forces (including serving personnel, families and veterans) | <ul style="list-style-type: none"> This policy does not directly disadvantage tenants from the armed forces (whether that be serving personnel, their families, or veterans). However, it is noted that consideration should be given to increased likelihoods of additional vulnerabilities or needs (for example disability arising from injury, or mental health conditions). However, these considerations are covered under those specific characteristics. | □ | ⊗ | □ |
| Other, e.g. carers, care leavers, low income, rurality/isolation, etc. | <ul style="list-style-type: none"> No other considerations have been identified. | □ | ⊗ | □ |

| Protected group | Summary of impact | | | Negative outcome | Neutral outcome | Positive outcome |
|---|-------------------|---------------------------|----------------------------------|--------------------------|-----------------|------------------|
| Negative outcomes action plan Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take. | | | | | | |
| Action taken/to be taken | Date | Person responsible | How will it be monitored? | Action complete | | |
| <i>None; mitigations are already included in the Policy.</i> | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| | Select date | | | <input type="checkbox"/> | | |
| If negative impacts remain, please provide an explanation below. | | | | | | |
| | | | | | | |

| | |
|---------------------------|---|
| Completed by: | Darren Hicks – Tenancy Services Manager |
| Date: | June 2025 |
| Approved by: | Andy King – Assistant Director for Housing (Regulatory Services) |
| Date: | 15.07.2025 |
| To be reviewed by: | Tenancy Services Manager |
| Review date: | In line with Policy revision |

Ensure that a final copy of this impact assessment is sent to HR as per the equality impact assessment guidance.



Anti-Social Behaviour Policy (Housing)

| Issue details | |
|-----------------------------|---|
| Title: | Anti-Social Behaviour Policy (Housing) |
| Version number | 1.7 |
| Officer responsible: | Tenancy Services Manager |
| Authorisation by: | |
| Authorisation date: | |
| Review Date | |

History Of Most Recent Policy Changes

| Date | Section | Change | Origin of change (eg change in legislation) |
|----------------------------|---------|--|---|
| 31 st July 2025 | 1.2 | Wording change | Wording |
| 31 st July 2025 | 1.4 | Included reference to Public Sector Equality Duties | Equality Act 2010 |
| 31 st July 2025 | 3.5 | Section added to incorporate tenancy sustainment where possible | Additional Section |
| 31 st July 2025 | 3.6 | Section added to incorporate tenancy sustainment where possible | Additional Section |
| 31 st July 2025 | 6.1 | Section added to evidence proactive measures in dealing with ASB | Additional Section |
| 31 st July 2025 | 7.5 | Section added to include regard to victim and perpetrators vulnerabilities | Additional Section |
| 31 st July 2025 | 7.5 | Section added to ensure | Additional Section |

| | | | |
|----------------------------|------|--|--------------------|
| | | complainants are updated | |
| 31 st July 2025 | 7.9 | Section amended to include reference to EDDC Tenancy Agreement | Wording |
| 31 st July 2025 | 7.17 | Section added regarding behaviour that is not considered ASB | Additional Section |

East Devon District Council

Anti-Social Behaviour Policy

1 Why has the council introduced this policy?

- 1.1 East Devon District Council recognise that all tenants have a right to the peaceful enjoyment of their home. Equally, every tenant has the responsibility not to interfere with their neighbours right to the peaceful enjoyment of their home.
- 1.2 We understand the impact that anti-social behaviour (ASB) can have on tenants and communities. This policy sets out a broad framework for how we help find solutions to ASB within the communities in which we operate, ensuring they remain safe, thriving places to live.
- 1.3 This policy will enable EDDC to deliver a proportionate, reasonable, fair and flexible response to anti-social behaviour
- 1.4 The Council will take proportionate and timely action to deal with reports of anti-social behaviour. All actions considered will have due regard to the council's public sector equality duty under section 149 of the Equality Act 2010. The action taken will be proportionate to the severity, impact and frequency of the ASB, and the evidence available to support the case. In the majority of cases legal action is not necessary. However, the Council will take legal action if it is appropriate to do so.

2 Scope and purpose of this policy document?

- 2.1 This document supports East Devon District Council's vision statement and is intended to fulfil the requirements of section 218A of

the Housing Act 1996 (as inserted by section 12 of the Anti-Social Behaviour Act 2003) with regard to the publication of the policies and procedures of a local housing authority in relation to anti-social behaviour.

- 2.2 It tells you what anti-social behaviour (ASB) is and sets out the guiding principles for those officers in the Council who deal with ASB.
- 2.3 It says what we want our services to achieve for people experiencing ASB, and sets out the principles on the kind of service level and quality we aim to provide.
- 2.4 This document does not say how we will deal with ASB on a day-to-day basis; this is covered in our procedures document.

3 Our responsibilities

- 3.1 East Devon District Council has a wide range of responsibilities in dealing with ASB.
- 3.2 As a social landlord, we have a duty under the Anti-social Behaviour Act 2003 to respond to ASB affecting the properties we manage. Our landlord duties and powers are different from, and usually act in addition to, the duties and powers we have to deal with ASB in the wider community. In this document we will make it clear when a policy or a power applies only to Council tenancies. We have a range of additional powers to take action against those causing ASB under the Anti-social Behaviour, Crime and Policing Act 2014.
- 3.3 In our role as a statutory member of the East Devon & Mid-Devon Community Safety Partnership, we must work with the police and other agencies to reduce crime and disorder in East Devon under the Crime and Disorder Act 1998. In this role we play a key part in dealing with ASB of all kinds and also undertake project and preventative work.
- 3.4 We recognise that, left unchallenged, anti-social behaviour can have a significant negative impact on the lives of our residents.
- 3.5 When approaching perpetrators of ASB we will give consideration to issues of vulnerability (e.g. disability (including mental health) and substance misuse) and make referrals to agencies as necessary. Supporting perpetrators can have a positive impact for both the individual and the wider community and helps to prevent displacement of the ASB.
- 3.6 Enforcement action may run alongside supportive measures, to help prevent the recurrence of the ASB. It is recognised that not all perpetrators will be aware of their underlying problems or willing to accept a support programme, but the Council will endeavor to encourage awareness and engagement as a means of helping to sustain tenancies.

- 3.7 Using these methods, we'll deliver a proportionate, reasonable, fair and flexible response to anti-social behaviour.
- We will make use of the powers, orders and mechanisms available to us to deal with anti-social behaviour.
 - We will participate in joint working with partner agencies.
 - We will place victims and witnesses at the centre of our procedures.

4 Definition of Anti-Social Behaviour

- 4.1 In our tenancy agreement we describe antisocial behaviour as being any behaviour or activity which causes fear, alarm or distress to one or more persons not of the same household. This includes damage to property or behaviour that is likely to injure, intimidate, and cause alarm or distress.

- 4.2 ASB is further defined under certain circumstances, as follows:

- For the purposes of an application to the courts by a housing provider, local authority or the police for a civil injunction: “conduct capable of causing nuisance or annoyance to a person in relation to that person’s occupation of residential premises”;
- For the purposes of the housing management functions of a housing provider or local authority: “conduct capable of causing housing-related nuisance or annoyance to any person”
- For the purposes of ASB case reviews (the “Community Trigger”): “behaviour causing harassment, alarm or distress to members or any member of the public”.
- The tenancy agreement says at 4.3.1 **You are responsible for the behaviour for you and your household.**
You are responsible for the behaviour of your children and people living in or visiting your home. We will take legal action to evict you if you, your relatives, your children or visitors behave antisocially. It also gives examples of unacceptable behaviour:
 - Hate Crime threats of violence or intimidation because of an individual’s Race, Sexual orientation, Gender, Transgender, Religion, Disability
 - Violence against a person
 - Damaging property
 - Verbal abuse and insults
 - Intimidation, using or threatening violence
 - Nuisance from pets
 - Noise nuisance

- Odor and smoke nuisance

- 4.3 Any person who has a concern as to whether they are being affected by anti-social behaviour should seek advice and assistance from their Housing Officer in Estate Management.

5 **Working in context**

- 5.1 Our work combating anti-social behaviour takes account of our many obligations and considerations. Our policy is part of the Anti-Social Behaviour Escalation process designed to provide a balanced and coordinated approach to the prevention, identification and rectification of anti-social behaviour throughout East Devon.

6 **Our approach**

- 6.1 East Devon District Council working with all partner agencies is committed to using a wide range of measures to prevent and combat anti-social behaviour. Some of these measures are:
- We have tenancy agreements that sets out anti-social behaviour approach.
 - We will fully explain the tenancy agreement to all new tenants as part of the tenancy sign up process.
 - We will use a wide range of measures to address anti- social behaviour including interviews, informal and formal warnings and Acceptable Behaviour Contracts (ABC's).
 - We will use the legal remedies that are available to us including Community Protection Notices, nuisance abatement notices, prosecutions, fixed penalty notices, civil injunctions, Criminal Behaviour Orders and possession proceedings.
 - We will seek to prevent Anti-Social Behaviour through:
 - New Tenant Visits-these take place within 1 weeks of the tenancy start date and are used to emphasise tenant obligations and to highlight any current complaints. They are also an opportunity to follow up any support or vulnerability issues already identified at sign up.
 - Use of Introductory Tenancies –all first time Council tenants are Introductory Tenants unless there is good reason for them not to be. This type of tenancy is a useful management tool enabling us to take action to evict the tenant during the lifetime of the Introductory Tenancy for any breach of the tenancy including ASB.
 - Estate Inspections with residents and partner agencies - to enable the identification of areas which could benefit from environmental improvements.

- 7 How to make an Anti-social Behaviour report or complaint about an incident or ongoing situation**
- 7.1 If our tenants and residents are suffering from any kind of anti-social behaviour we request that they report the problem as soon as possible to their Housing Officer in Estate Management.
- 7.2 Anti-social Behaviour reports can be made in person, in writing, by telephone, by email or through a third party, for example through a councillor, friend or relative. However, the third party will not be able to obtain any information about your report without your express permission.
- 7.3 Complaints can also be made anonymously; however this may restrict the amount of investigation and action we can undertake and won't allow us to provide the complainant with information and support. We would recommend, therefore, that complainants give us their name and address. This will not be revealed to any other party without the consent of the complainant.
- 7.4 It is important that problems are reported promptly. There are several reasons for this:
- It allows us to give advice and support to the people who are suffering as a result of the behaviour from an early stage.
 - It allows us to take prompt action in dealing with the issues.
 - It may be possible to solve minor issue(s) very quickly.
 - Very serious incidents can be dealt with swiftly, thereby protecting our residents.
 - It provides evidence of an ongoing or repetitive issue.
- 7.5 Upon receipt of a complaint or anti-social behaviour report we will:
- Record the complaint.
 - Acknowledge and respond to the complaint; initially this will usually be by the Estate Management Housing Officer for the area. If the problem is serious and/or continues after initial action has been taken the case may be referred to the authority's Legal Services.
 - Interview the complainant and develop an initial action plan, in consultation with the complainant where known, to investigate the problem.
 - Assess the risk of harm to the victim(s) of the ASB, and any potential vulnerabilities they may have when the Council receives a complaint about anti-social behaviour.
 - Consider whether mediation is appropriate and, if so, offer this to the complainant and then to the other party involved in the problem(s).
 - Investigate as far as possible every complaint, even when reported anonymously.

- Take timely, effective and consistent action to tackle the problems by utilising the range of measures available to us. This will include working with our partner agencies.
- Ensure complainants are up to date and aware of the progress of their case.

7.6 If mediation is considered inappropriate or is refused, the action plan will usually involve assisting us by gathering further evidence of any further incidents or ongoing problems. This is likely to involve the complainant keeping a diary of further incidents (diary sheets will be supplied). It's important that these are completed as soon as possible after an incident has occurred and supply as much detail as possible. This will enable us to:

- Assess objectively the level of the problem.
- Assess the success of any action we take.
- Build an evidence case for further action.
- Take further action.

7.7 If for any reason the complainant is unable to complete diary sheets, for example due to learning or sensory disabilities, literacy problems or language barriers, alternative methods of information collection can be used. It would assist if such assistance is requested on initial contact with the service, and we will aim to accommodate your communication preferences wherever we can.

7.8 All information supplied to us will be treated as confidential and the identity of the complainant will not be revealed without their permission or where the need to take the matter to court requires this to be disclosed. However, there may be instances where we cannot take any further action without revealing the identity of the complainant. This will be fully discussed with the complainant and their permission gained before we will proceed. It's important that the complainant gives due consideration to this as it may become impossible for us to take any action to address the problem if permission is not given.

7.9 When full information has been obtained from the complainant it will usually be necessary to consider securing other supporting evidence for example:

- Contacting others who may have been affected by the conduct.
- Issuing incident diary sheets to witnesses.
- Interviewing the alleged perpetrator.
- Direct observation of activities by Housing Officer or other staff or agencies.
- Professional quality recording of noise.
- Review of private CCTV, please see section 4.5.5 of Tenancy Agreement.

- 7.10 The following possibilities will be considered only in the most serious of cases working with the police and other support agencies, these will be used as an exception and are not considered without police support and senior officers consideration:
- CCTV surveillance of the area where the problem has occurred.
 - Use of professional witnesses.
- 7.11 On receipt of submitted evidence the case will then be assessed and an appropriate course of action taken. Further investigations may need to be made. These should be carried out as quickly as possible and the case should be reviewed and reassessed within an agreed timescale contained in the relevant Housing Service procedure. Actions that may be considered, include but are not limited to:
- No action required because there's no case to answer.
 - Informal resolution where an understanding has been reached.
 - Warning letters and formal cautions.
 - Acceptable Behaviour Contracts (ABCs).
 - Referral to another agency e.g. Police, Social Services, Mental Health Team
 - Multi Agency joint working to coordinate actions
 - Environmental Health referral for Community Protection Warnings/Notice or Statutory Nuisance proceedings.
 - Criminal Behaviour Order application
 - Injunctions (if the case involves violence or threats of violence it may be possible to obtain an emergency injunction with exclusion and power of arrest without notice).
 - Undertakings – a legal promise to the Court to do, or not to do a particular thing.
 - Possession proceedings.
- 7.12 We will use Housing Service procedures for the above actions to provide specific guidance on when actions are to be taken and suitable timescales.
- 7.13 Details of the proposed course of action will be communicated in writing to all concerned informing them of this and providing contact details of the Estate Management Housing Officer who will be dealing with the case. At any time during this process, serious or urgent cases will be referred to the Legal Services immediately.
- 7.14 Whatever the outcome of the assessment, regular contact (at the least monthly) will be maintained with complainants and witnesses throughout this process and they will be kept informed of the outcome.

- 7.15 If no further complaints are received after a reasonable period of time (given the facts of the case) the case may be closed, but no case will be closed until a check has been made with all complainants and witnesses. A case closure letter will be sent to the complainants, detailing why the case has been closed. A new case may be opened at a later date if subsequent complaints are received.
- 7.16 If, however, further complaints are received indicating a serious escalation of issues or if the case is deemed to be serious or urgent, the case may then be referred to the Legal Services and Housing Matters Forum for further action at any time.
- 7.17 There are some behaviours that will not be considered by us to be ASB. These are mainly reports due to different lifestyles or every-day living situations which are not intended to cause nuisance or annoyance will generally not be considered as ASB. These include:
- Normal household noise, such as noise from household appliances, children playing inside, children crying, dogs barking, occasional door slamming, toilets flushing, or sexualised noises.
 - Smells from cooking.
 - One-off parties, including BBQs.
 - DIY within sociable hours.
 - Noisy plumbing or appliances.
 - Parking disputes.
 - Minor behavioural irritations – such as ‘dirty looks’, ‘staring’, or ‘non abusive’ comments.
 - Household lifestyle clashes.

8 Supporting witnesses and complainants

- 8.1 We recognise that the participation of witnesses and complainants is central to success in dealing with anti-social behaviour. We'll do this by dealing with complaints promptly and keeping witnesses informed. We'll also offer real and practical support by a number of initiatives, including:
- Providing home security measures.
 - Providing panic alarms in serious cases.
 - Liaising closely with the police.
 - Using our officers as professional witnesses.

9 Multi agency working.

- 9.1 We will engage in collaborative work with other agencies in order to deter or prevent anti-social behaviour and to rehabilitate those who have engaged in such behaviour. We'll support and make referrals to the Devon Mediation Service to encourage resolution of disputes by consensus at the earliest possible stage, where it is appropriate for mediation to be offered.
- 9.2 We will work with agencies to engage support for tenants whose tenancies are at risk by reason of ASB. We'll participate in Anti-Social Behaviour Intervention Panel meetings and will access intervention services from agencies such as mental health, drug and alcohol services and counselling services.
- 9.3 We will work with our partner agencies in a manner that will combine and co-ordinate our efforts to best effect. We identify our principal partners in this activity as the police, the Community Safety team and our fellow social landlords.
- 9.4 We will complete and maintain data exchange protocols with our partner agencies to facilitate this collaborative work.

10 Our staff

- 10.1 Our staff are central to the delivery of our response to anti-social behaviour. We will make a commitment to protecting our staff when they are personally subjected to offensive conduct, behaviour and threats.
- 10.2 We will train our staff to ensure that they are aware of the issues of anti-social behaviour, the remedies which they can access and their role in the procedure.

11 Complaints regarding the service provided

- 11.1 Complaints relating to the service provided should initially be raised with the Housing Officer assigned the case to seek satisfactory resolution.
- 11.2 If the above fails to resolve concerns, the council's formal complaints procedure may be used. Details are available on this and the Housing Ombudsman Service on <https://eastdevon.gov.uk/customer-services/feedback-and-complaints/making-a-complaint/complaints-procedure/>.

12 Equality impact considerations

- 12.1 The policy is high relevance to equality if it has a big impact on residents and users of the service. HIGH

13 Data Protection considerations

b) The collection and use of tenant's personal data will not exceed that agreed to in their tenancy agreement

The [EDDC Data Protection Policy](#) provides further information on how we store and use personal information.

The following privacy notice(s) provide further information on how we will use tenant's personal data, how it is gathered, and how long we will retain this information, and what rights tenants have in relation to this.

Housing Services - Enforcing conditions of tenancy agreement

All our privacy notices can be found on the EDDC website (<https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>)

14 Policy Consultation

- 14.1 This policy has undergone internal and external consultation, namely through the council's own Anti-social Behaviour and Community Safety Teams, our external partners, and housing tenants through an open consultation survey and dedicated focus groups. The policy has been approved by our Executive Leadership team, and scrutinised by our Housing Review Board.

15 Related Policies/Strategies, Procedures and Legislation

- Anti-Social Behaviour, Crime and Policing Act 2014.
- Anti-Social Behaviour Act 2003
- East Devon Safer Community Anti-Social Behaviour Strategy
- Environmental Protection Act 1990
- Housing Act 1996
- EDDC Domestic Abuse Policy
- Possession of Council Homes and Garages Policy
- Housing Service Noise Procedure
- Tenancy Agreement – June 2019
- Anti-Social Behaviour Escalation Process
- Community Protection Warning Procedure
- Community Protection Notice Procedure
- Public Sector Equality Duty (Equality Act 2010)
- Crime and Disorder Act 1998
- Mental Capacity Act 2005

16 Policy Review Date and Reviewing Officer

- 16.1 The Tenancy Services Manager will review the policy in July 2028.
- 16.2 The Policy will be reviewed sooner should there be a significant change in legislation or case law or following feedback from residents, the regulator/ombudsman, or any other partner or stakeholder, regarding best practice and/or learning.

Report to: Housing Review Board

Date of Meeting 31.07.2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Electrical Safety Policy for Housing - Updated

Report summary:

This report outlines the updates and changes made to the Housing Directorate's 'Electrical Safety Policy'. These changes are made in response to changes in legislation and to ensure a full and robust policy is in place. The main body of the policy was approved by the Housing Review Board in 2023 and is due for full review in September 2026.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

- (1) That the Housing Review Board approved the updates and amendments to the Electrical Safety Policy for Housing.

Reason for recommendation:

To ensure ongoing robust and compliant management of our electrical safety processes and programmes.

Officer: Andy King, Assistant Director for Housing (Regulated Services)

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: Medium Risk; Failure to keep our policy up to date with current legislation poses a health and safety risk to the council, as well as reputational and regulatory risk.

Links to background information N/A

Link to [Council Plan](#)

Priorities (check which apply)

- ☐ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Report in full

Attached is the full copy of the Electrical Safety Policy for reference.

The following updates have been made to the previously scrutinised and approved policy:

| Page | Change | Origin of Change |
|------|--|---|
| 1 | 'Issue Details' | Structure change reflected in 'Officer Responsible' |
| 5 | Section 3.7 - Compliance Remedial Work | Clearer detail of code descriptions |
| 7 | Section 4.2 - Quality Assurance | Clearer detail of inspection regime |
| 7 | Section 4.3 - Non-Compliance/ Escalation Process | Clearer detail on reporting of non-compliance |
| 8 | Section 4.9 - Code of Practice | Update of BS7671 version |

The purposes of these changes is to ensure ongoing compliance with legislation, and a clear and transparent Policy that supports robust management of Electrical Safety across our stock.

These changes have been approved by our Executive Leadership Team.

Financial implications:

None

Legal implications:

These changes will ensure ongoing compliance with legal and regulatory frameworks.

| Issue details | |
|-----------------------------|---|
| Title: | Electrical Safety Policy |
| Version number | Version 2.0 |
| Officer responsible: | Corporate Lead for Property and Assets |
| Authorisation by: | Housing Review Board |
| Authorisation date: | November 2023 |

| History of most recent Policy Changes – Must be completed | | | |
|---|------|--|---|
| Date | Page | Change | Origin of Change e.g (Change in legislation) |
| 4 th August 2023 | 2 | Legislation | |
| 4 th August 2023 | 3 | Policy principles | |
| 4 th August 2023 | 4 | No access | |
| 4 th August 2023 | 5 | Compliance remedial work | |
| 4 th August 2023 | 5 | Performance Management | |
| 4 th August 2023 | 7 | Policy administration | |
| 2 nd December 2024 | 1 | 'Issue Details' | Structure change to reflect 'Officer Responsible' |
| 2 nd December 2024 | 5 | Section 3.7 - Compliance Remedial Work | Clearer detail of code descriptions |
| 2 nd December 2024 | 7 | Section 4.2 - Quality Assurance | Clearer detail of inspection regime |
| 2 nd December 2024 | 7 | Section 4.3 - Non-Compliance/ Escalation Process | Clearer detail on reporting of non compliance |
| 2 nd December 2024 | 8 | Section 4.9 - Code of Practice | Update of BS7671 version |

1.0 Previous Policies/Strategies

Version 1

2.0 Why has the council introduced this policy?

The electrical safety policy details how East Devon District Council meet the requirements for electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. In addition to this the policy provides assurance that measures are in place to ensure compliance with these regulations and to identify, manage and/or mitigate risks associated with electrical installations and electrical portable appliances.

The policy is relevant to tenants, contractors and other persons who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon East Devon District Council to maintain a safe environment for tenants and employees within the home of each tenant and within all non-domestic (communal) premises or areas of buildings. East Devon District Council will follow a systematic approach to the management of electrical work to ensure it meets the requirements set out in BS 7671 2018 Requirements for Electrical Installations IET Wiring Regulations 18th edition including all amendments and other relevant legislation relating to electrical safety. This is to ensure the safety of tenants, employees and members of the public.

3.0 What is the council's policy?

3.1 Introduction

East Devon District Council acknowledges and accepts its responsibilities with regard to electrical safety under the Landlord and Tenant Act 1985, the Housing Act 2004, the Electricity at Work Regulations 1989 and the Electrical Equipment (Safety) Regulations 2016. The Landlord and Tenant Act 1985 places duties on landlords to ensure that electrical installations in rented properties are:

- Safe when a tenancy begins
- Maintained in a safe condition throughout the tenancy

In order to be compliant under these duties electrical installations are required to be periodically inspected and tested. The intervals between inspections are not absolutely set within any regulations, however, best practice guidance from the Electrical Safety Council and from BS7671: 2018 states that electrical installations should be tested at intervals of no longer than 5 years from the previous inspection.

3.2 Legislation

This policy is written to ensure that East Devon District Council is compliant with the following legislation in respect of Electrical safety:

- The Landlord & Tenant Act 1985
- Housing Act 2004
- Regulatory Reform Fire Safety 2005
- Defective Premises Act 1972
- Electrical at Work Regulations 1989
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Health & Safety at Work Act 1974
- Environmental Protection Act 1990
- The Building Regulations for England and Wales (Part P)

3.3 Standards

- The Consumer Standards (Home Standard)

3.4 Code of Practice

- IET Wiring Regulations British Standard 7671: 2008 (as amended 2015)
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE)
- HSE INDG236: 'Maintaining portable electrical equipment in offices and other low risk environments'
- Code of Practice for the Management of Electrotechnical Care in Social Housing

3.5 Policy Principles

Detailed below are the key policy principles relating to electrical safety:

East Devon District Council will hold accurate records against each property it owns or manages identifying when the electrical installation was last inspected and tested and all electrical portable appliances that is held at each property together with details of Portable Appliance Tests (PATs) undertaken.

East Devon District Council will ensure that all domestic properties owned or managed have a valid Electrical Installation Condition Report (EICR) that is no older than 5 years from the date of the previous EICR. East Devon District Council will deliver a comprehensive programme of testing and inspection of all domestic properties on a rolling 5-year cycle.

East Devon District Council will ensure that all non-domestic (communal) properties and offices owned or managed have a valid Electrical Installation Condition Report (EICR) that is no older than 5 years from the date of the previous EICR. East Devon District Council will deliver a comprehensive programme of testing and inspections of all non-domestic (communal) properties and offices on a rolling 5-year cycle.

East Devon District Council will ensure that all electrical installations shall be in a satisfactory condition following completion of an electrical installation inspection and test where possible. Where a test is unsatisfactory & remedial repairs are unable to be carried out at time of test, the contractor will ensure they return to site within 28 days from receipt of order to carry out such works.

East Devon District Council will ensure that electrical installation inspection and tests are carried out prior to the commencement of any new tenancies (void properties), mutual exchanges and transfers and that a satisfactory EICR is issued to the tenant prior to them moving in.

East Devon District Council will ensure that only suitably competent NICEIC electrical contractors and engineers undertake electrical works.

East Devon District Council will ensure that all electrical portable appliances are tested periodically in accordance with the testing guidance set out in 'The Code of Practice for In-Service Inspection and Testing of Electrical Equipment' (ISITEE).

East Devon District Council will carry out electrical installation inspection and tests and issue new satisfactory EICRs when completing planned component

replacement works within domestic properties. In the case of a rewire East Devon District Council will receive an installation certificate and following minor works, a minor works certificate.

East Devon District Council will test and replace as necessary smoke alarms, heat detectors and carbon monoxide detectors which are not covered as part of the annual gas safety check visit (i.e. the property does not have gas), as part of the 5-yearly electrical inspection and testing visit.

East Devon District Council will ensure that robust processes and controls are in place to manage the completion of follow up works identified during inspection and testing of electrical installations and electrical portable appliances. East Devon District Council will ensure that robust processes and controls are in place to ensure that all electrical works are properly notified and approved under Part P of the Building Regulations for England and Wales where this is required.

East Devon District Council will ensure that robust processes and controls are in place to manage works to void and occupied properties that may affect existing electrical installations

3.6 No Access

East Devon District Council will have a robust process in place to gain access to properties where tenants refuse access to ensure tenant safety and to ensure East Devon District Council fulfil their duty as a landlord.

3.6.1 EICR Testing

East Devon District Council will write to advise tenants that their property is included in the testing programme for that forthcoming year & that a named contractor has been appointed to carry out the work.

Our appointed Electrical Contractor will call &/or write to the tenant advising them of when they will be attending to carry out the electrical test.

If the tenant is not home at the time of the test or the tenant refuses access our Electrical Contractor will make a further attempt to book an appointment with the tenant, this will be by telephone and/or letter.

Should the tenant refuse access, fail to make a suitable appointment or make an appointment (which is not kept), for whatever reason, the Electrical Contractor will refer this back to the Council for their pursuance.

An appropriate Officer will attempt to make contact with the tenant to arrange an appointment to carry out the electrical test (EICR). If they are unable to do so, the Officer will serve the tenant with a final warning letter stating that the tenant must arrange an appointment with the Council's appointed Electrical Contractor within the next 7 days.

Should the tenant fail to make contact within the designated time (7 day period), a 7 day legal letter will be served advising the tenant that the

Council's appointed Electrical Contractor will be attending on a specific date and time (legal appointment). The letter states that the tenant must allow access at this time and the Council may force entry where there is a proven need to ensure the tenant and other resident's immediate safety

On the day of the legal appointment a relevant Officer will attend the tenant's property with the Electrical Contractor and a locksmith to carry out the electrical test (EICR). Should the tenant not be home at the time of the legal appointment the Council will force entry to carry out the test to ensure the property is safe. If the tenant is at home but refuses access, the Officer will refer this to our Legal Department to apply for a Court Injunction to compel the tenant to allow access to enable the Electrical Contractor to carry out the test (EICR).

3.7 Compliance Remedial Work

East Devon District Council will ensure there is a robust process in place for the management of any follow-up works required following the completion of a periodic inspection and test of an electrical installation or electrical portable appliance. East Devon District Council Electrical Contractor will as a minimum make safe and/or will repair all code 1 and code 2 defects identified by a periodic electrical installation inspection and test before leaving site after completing the inspection and testing works.

Any code 2 works which cannot be completed at the time of the inspection and test will be completed within a maximum of 28 working days and an EICR issued stating that the installation is in a satisfactory condition.

Code 3 (recommended improvement) typeworks will be referred back to the Council's programme manager for a decision.

East Devon District Council will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to electrical safety.

3.8 Record Keeping

East Devon District Council will record and maintain a core asset register of all properties that have an active electrical supply and electrical installation. This register should identify electrical installations within all domestic properties and electrical installations within non-domestic (communal) properties and offices.

East Devon District Council will establish and maintain a register against each property asset of any electrical portable appliances and portable appliance testing (PAT) requirements.

East Devon District Council will establish and maintain accurate records of all completed Electrical Installation Condition Reports (EICRs), Minor Electrical Works Certificates (MEW) and Building Regulation Part P notifications associated with remedial works from these reports and Electrical Installation Certificates and keep these for a period of not less than 10 years.

East Devon District Council will establish and maintain accurate records of all completed electrical Portable Appliance Test reports and details of associated completed remedial works and keep these for a period of not less than 5 years.

3.9 Performance Management

The following key performance indicators are reported to East Devon District Council's Leadership team & Housing Review Board –

- Number of properties with a valid electrical inspection certificate (EICR - 5 yearly)
- Category 1 & Category 2 actions arising from an unsatisfactory EICR (residential dwellings)
- Number of distribution boards in communal areas with a valid electrical inspection certificate (EICR - 5 Yearly)
- Category 1 & Category 2 actions arising from an unsatisfactory EICR (communal areas)

These key performance indicators are also used to monitor the contractors performance.

4.0 Competent Persons

East Devon District Council will ensure that the manager(s) with lead responsibility for operational delivery are appropriately qualified holding a recognised safety management qualification.

East Devon District Council will ensure that only suitably competent NICEIC Approved Electrical Contractors (or equivalently accredited) contractors are procured and appointed to undertake electrical inspection, testing, installation and repair works.

The operational team with responsibility for delivery will check the relevant accreditations for the work that they are carrying out as part of the due diligence checks carried out at the procurement of any new contract. These checks will be undertaken on an annual basis to ensure competency and training is up to date.

East Devon District Council will ensure that only suitably competent engineers are employed or appointed to undertake electrical portable appliance testing (PAT). The operational team with responsibility for delivery will check the relevant qualifications of persons undertaking PAT testing to ensure that they are certified as competent to carry out PAT testing. These checks will be undertaken on an annual basis.

4.1 Training

The manager(s) with lead responsibility for operational delivery will hold a relevant qualification in respect of electrical safety compliance management.

On the job training will be provided by an external provider to those employees who will be responsible for managing the programme of electrical installation

inspections and repair works to electrical installations and portable appliances as part of their daily job and other employees within the Property & Asset Team.

4.2 Quality Assurance

East Devon District Council will carry out 100 per cent desktop audits on the documentation using specialist compliancy software.

East Devon District Councils Electrical Compliancy team will carry out a minimum of 5% on site inspection of completed works

The Council will carry out an independent audit of electrical safety at least once every three years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.

4.3 Non-Compliance/Escalation Process

The definition of non-compliance in relation to this policy refers to any incident which results in a potential breach of legislation or regulatory standard, or which causes or has the potential to cause a significant a risk to health or safety.

Any non-compliance issue identified at an operational level will be formally reported to the Corporate Lead for Property and Assets as part of the monthly reporting cycle.

Where necessary the Corporate Lead for Property and Assets will agree an appropriate course of corrective action with the relevant operational team(s) in order to address the non-compliance issue.

The Corporate Lead for Property and Assets will ensure timely reporting of non-compliance issues to the Assistant Director for Housing (Regulated Services) and the Executive Leadership Team, and where appropriate bring the issues and planned remedies to the attention of the Housing Review Board.

4.4 Electrical Safety Information

East Devon District Council considers good communication essential in the safe delivery of electrical safety management and will therefore ensure that relevant information is provided to residents. East Devon District Council will develop on their website information and advice to customers regarding electrical safety and will publish this information through other outlets such as social media and in the Housing Matters Magazine.

4.5 Regulatory & Legislative Compliance

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England.

4.6 Policy Administration

4.6.1 Appendices and other relevant information

N/A

4.6.2 Links related Policies/Strategies, Procedures and Legislation

4.7 Legislation

This policy is written to ensure that East Devon District Council is compliant with the following legislation in respect of electrical safety:

- The Landlord & Tenant Act 1985
- Housing Act 2004
- Regulatory Reform (Fire Safety) Order 2005
- Defective Premises Act 1972
- Electrical at Work Regulations 1989
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Health & Safety at Work At 1974
- Environmental Protection Act 1990
- The Building Regulations for England and Wales (Part P)

4.8 Standards

- Consumer Standards (Home Standard)

4.9 Code of Practice

- IET Wiring Regulations British Standard 7671: 2018 Amendment 3
- The Code of Practice for In-Service Inspection and Testing of Electrical Equipment (ISITEE)
- HSE INDG236: 'Maintaining portable electrical equipment in offices and other low risk environments'
- Code of Practice for the Management of Electrotechnical Care in Social Housing

5.0 Data Protection

5.0.1 b) The collection and use of tenant's personal data will not exceed that agreed to in their tenancy agreement

The [EDDC Data Protection Policy](#) provides further information on how we store and use personal information.

The following privacy notice(s) provide further information on how we will use tenant's personal data, how it is gathered, and how long we will retain this information, and what rights tenants have in relation to this.

Property and Assets - Completion of programmed, servicing and cyclical works

All our privacy notices can be found on the EDDC website
(<https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>)

5.2 Policy consultation

Involved Tenants & Housing Review Board

5.3 Policy review

September 2026 by the Corporate Lead for Property and Assets

Report to: Housing Review Board

Date of Meeting 30th July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release NA



Housing Repairs Policy & Awaab's Law

Report summary:

The following report presents a proposed Repair Policy that will replace the existing April 2021 Repairs Policy and the existing Damp and Mould policy. The proposed policy aligns with the new requirements from Awaab's law and other related legislation.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. The Housing Review Board to recommend to Cabinet that they approve the proposed Repairs Policy.
2. That the Housing Review Board note some final amends may be made following further feedback from tenant scrutiny and stakeholders (Commitment to bring the Policy back to HRB should any material amends be required).

Reason for recommendation:

The current policy is out of date and the introduction of Awaab's law from 27 October 2025 will require a risk-based approach to repair, which defined timescales for responding and completing the highest risk repairs.

Officer: Nathan Muggeridge, Corporate Lead for Property & Assets

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk; Risk considerations outlined in section 5 of this report.

Links to background information [Awaab's Law: Draft guidance for social landlords - GOV.UK](#)

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Housing Repairs Policy & Awaab's Law

Background / Context

1. The Responsive Repairs Policy was last published in April 2021 and was supposed to be reviewed after 3 years. Furthermore, the Damp & Mould Policy needs to be reviewed in 2025.
2. Awaab's Law draft guidance was published on 25th June 2025 and it confirmed the new legislation will be implemented from the 27th October 2025. The compliance with the new law will require change in the approach to how repairs are managed, and the performance is tracked.

Repairs Policy

3. **'Appendix A - Repair Policy - June 25'** is the proposed Repairs Policy.
4. The repairs policy is based on a person centred and risk-based approach that will enable EDDC to balance cost, performance and risk. This approach aligns with the requirements of Awaab's Law and other relevant legislation.

Risks

5. The key risks associated with the proposed Repairs Policy include:

| Ref | Risk | Mitigation Measure | Residual Risk |
|-----|---|---|---------------|
| 1 | The additional resources required to delivery the new policy and the ability to recruit these resources. | The ongoing recruitment to fill the current vacant roles and approval to create additional roles will see the Property and Assets team increase capacity. Changes in repair volumes and performance will be monitored closely for supply and demand challenges. | Medium |
| 2 | The compliance with the timescales and actions associated with Awaab's law requires a case-management capability, which is not available with the Housing System currently. It will take time to implement. | It is planned to start exploring case management capabilities, but this will take time and is unlikely to be implemented prior to October 2025. | High |

| Ref | Risk | Mitigation Measure | Residual Risk |
|-----|---|--|---------------|
| 3 | Delays or an insufficient planned works programme leading to ongoing repairs needs potentially increasing further. | Approved staffing resource will help to minimise the planned works programme delays. Further work is required to understand the scale of the planned works programme required to meet the current repairs requirement. | High |
| 4 | Increases in the demand for repairs services following the awareness associated with Awaab's law, which will coincide with the start of the annual increase in repairs needs. | Explore options for increasing the Call Agent and Survey capacity using existing resources (e.g. other admin roles helping with call management). | Medium |

Next Steps

6. The application of the new Repairs Policy will be supported by the following next steps:
- Obtain feedback from the Repairs and Maintenance Scrutiny Group and other stakeholders.
 - Ask Trowers, EDDC's Disrepair solicitor, to complete a review of the policy and provide feedback.
 - Continue to recruit to vacant roles in the Property & Assets Team.
 - Establish the ability in One Housing to assign the priority classifications to all repairs and track compliance with the target delivery timescales.
 - Setup a standard survey reporting template and identify how the reports will be provided to tenants. It is recognised not all tenants will have access to email.
 - Implement the Repair's Call Agent scripting so it aligns with the Repair's policy and minimises the number of survey requirements.
 - Review current and historic Damp and Mould data, plus the stock condition HHSRS failure data to quantify the current risks. Proactive visits will then be scheduled to these properties to quantify the risk and allow any repairs to be completed prior to the end of October 2025.
 - Explore how the decant capacity can be increased in a cost-effective manner to meet the potential needs from the new repair policy. The future demand for decants is currently unknown, but likely to increase.
 - Continue to review the resources and budgets required to implement and deliver compliance with the new policy.
 - Commence the exploratory work to identify a suitable Case Management system.

Financial implications:

There are no current financial implications. Future budgets will take into consideration any additional demands. RW

Legal implications:

Awaab's Law will come into force for the social rented sector from 27 October 2025. From this point social landlords have to address all emergency hazards and all damp and mould hazards that present a significant risk of harm to tenants to fixed timeframes. It is important, therefore, that we have plans in place to ensure compliance. MW

Housing Repairs Policy

| Issue details | |
|-----------------------------|---|
| Title: | Housing Repairs Policy |
| Version number | Version 1.0 |
| Officer responsible: | Corporate Lead for Housing Property & Assets |
| Authorisation by: | |
| Authorisation date: | |

| History of most recent Policy Changes – Must be completed | | | |
|---|-----------------|----------------|--|
| Date | Section | Change | Origin of change (eg change in legislation) |
| June 2025 | Policy template | Policy Drafted | |
| | | | |

Policy

East Devon District Council

1 Why has the council introduced this policy?

This policy sets out how East Devon District Council delivers a responsive, risk-based repairs service that protects residents, prioritises health and safety, and aligns with Awaab's Law and other relevant legal obligations. The policy ensures repairs are prioritised based on risk to residents safety and security, and promotes consistent, transparent, and accountable decision-making that allows officers to balance cost, performance and risk.

This policy replaces both the Repairs policy published in April 2023 and the Damp and Mould policy that is due to be reviewed in June 2025.

This policy does not cover repairs to leasehold properties, improvements, modernisation, adaptations or planned works programmes

2 What is the council's policy?

Policy Objectives

The objectives of the policy include:

- Protect the health, safety and wellbeing of residents.
- Ensure compliance with Awaab's Law and related legislation.
- Prioritise resources to address defects and hazards having the greatest risk on residents health, safety and wellbeing.
- Provide a transparent, consistent and accountable repairs service.
- Allow for timely and consistent communications to enable customers to be kept informed.
- Deliver value for money and meet regulatory standards. This includes, where possible, delivering planned works programme over more expensive responsive repairs.
- Allow officers to balance:
 - Risk: Minimise risks (e.g. safety, environmental, social, etc) to customers and other stakeholders.
 - Cost: Ensure the continued financial viability of the social housing function.
 - Performance: Delivery of the regulatory performance standards (E.g. RSH Consumer Standards)

Legislative and Regulatory Context

This policy is informed by and complies with:

- Awaab's Law (via the Social Housing (Regulation) Act 2023)
- Homes (Fitness for Human Habitation) Act 2018
- Landlord and Tenant Act 1985
- Housing Act 2004 – HHSRS (Housing Health and Safety Rating System)
- Regulator of Social Housing: Consumer and Home Standards
- Building Safety Act 2022

Risk-Based Repairs Categorisation

All repairs are triaged and categorised by risk level, ensuring that the most serious issues are addressed first, regardless of when they were reported. The priority classification and definitions below will be used for all repairs activities.

| Priority | Definition | Examples |
|--------------------------|---|--|
| P1: Emergency Hazard | Immediate threat to life, health, security or building safety. Lower threat thresholds will be applied for vulnerable groups. | <ul style="list-style-type: none">• HHSRS Severe Risk (Cat 1).• Vulnerable tenant with no heating/hot water.• Failed front door lock on a property with young children.• Moderate HHSRS Damp & Mold risk in a property with young children. |
| P2: Significant Hazard | Potential risk to the health or safety. Lower threat thresholds will be applied for vulnerable groups. | <ul style="list-style-type: none">• HHSRS moderate risk.• Trip hazards on footpaths.• Inadequate lighting.• Failed front door lock on property with just adults. |
| P3: Routine - Urgent | Minimal customer risk or impact on the asset if resolved within 3 days. | <ul style="list-style-type: none">• Loss of water to non-vulnerable tenants• Loss of heating to non-vulnerable tenants• Roof leak during the winter• Broken window.• Drainage issue. |
| P4: Routine – Non-Urgent | No immediate risk, but needs attention to prevent impact on the asset or customer. | <ul style="list-style-type: none">• Leaking tap• Extractor fan not working.• Roof leaks reported during dry periods. |
| P5: Planned Works | Low risk or grouped for efficiency (e.g. cosmetic or cyclical) | <ul style="list-style-type: none">• HHSRS slight risks• Made safe/Decant Severe & Moderate HHSRS risks.• Painting, render repairs• End of life replacements: kitchen, bathroom, window, roofs, etc. |
| P6: Legal Works | Repairs work defined from legal decisions | <ul style="list-style-type: none">• Disrepair rulings requiring action within a defined timescale. |

| Priority | Definition | Examples |
|---------------|---|---|
| | include Disrepair rullings Complaints or Ombudsman decisions. | <ul style="list-style-type: none"> • Ombadsman case requiring action within a defined timescale. • Complaints requiring action within a defined timescale. |
| P7: No action | No risk. | <ul style="list-style-type: none"> • Kitchen or bathroom in the later stages of their lives. • Repairs task that are the responsibility of tenants (e.g. garden works, decorating, etc) • Condensation around windows. |

The above prioritisation framework will be used for all housing repair activities and contracts, including the compliance remedials.

Repair Timeframes

The repair timeframe consists of the following milestone:

1. Reporting: The timescales for the tenant to report the repair & EDDC to acknowledge and explain the next steps.
2. Survey Visit: Time limit to complete any required surveys and scope the necessary repairs.
3. Resolve, Make Safe or Establish Short-term relocation: Establishes the timescale to either complete the repair, undertake works to mitigate the risk (e.g. make safe) or complete a short-term relocation (e.g. decant) to remove the tenant(s) from the risk and allow the repair works to be completed.
4. Repair Completion: Timescale to complete any required repairs.

The above milestones and the relevant legislation has been used to generate the target response time framework below.

| Priority | Reporting | Surveyor Visit | Resolve, Make Safe or Establish Short-term relocation | Repair Completed |
|--------------------------|---|--------------------------------------|---|---|
| P1: Emergency Hazard | Emergency calls to be answered in 2 minutes and next steps confirmed. Emails or Repair Forms to be reviewed and responded to within 1 | 4 to 24hrs | 24hrs from the initial site visit | <12 weeks from the initial site visit |
| P2: Significant Hazard | | 10 working days | 5 working days after initial site visit | <12 weeks from the initial site visit. |
| P3: Routine - Urgent | | Should not require a surveyor visit. | NA | 3 days from the reporting. |
| P4: Routine – Non-Urgent | | Should not require a surveyor visit. | NA | 28 days from the reporting. |
| P5: Planned Works* | | As per Emergency & Significant | As per Emergency & Significant | As per the planned works schedule for the |

| Priority | Reporting | Surveyor Visit | Resolve, Make Safe or Establish Short-term relocation | Repair Completed |
|-----------------|--------------|--|---|---|
| | working day. | Hazard response where appropriate. | Hazard response where appropriate. | project. Categorised as 6mth, 1, 2, 3, 4 or 5 years. |
| P6: Legal Works | | Complaint – Stage 1: < 5 days. Complaint – Stage 2: < 10 days. Disrepair: 20 days or As per Emergency & Significant Hazard response where appropriate. | As per Emergency & Significant Hazard response where appropriate. | Complaint: As per the above criteria. Disrepair: As defined by the legal judgement. Categorised as 28 days, 60 days or 90 days. Ombudsman: 28 days. |
| P7: No action | | NA | NA | NA |

The application of the response timescale framework is supported by the following activities:

- For emergency and significant hazards, the tenant is to be provided with a report within 3 working days after the survey. The report will summarise the finding, confirming the work to be completed and when it will be delivered.
- Tenants will be updated at each milestone of the next steps and the associated timescales. If the timescales change, then the tenant will be updated proactively by the Repair Agents.
- All repairs and their delivery timescales confirmed through the Complaints process will align with the above prioritisation and timescale frameworks.
- Post repair inspections will be completed for a sample of the repairs. The sample rate will be increased if high numbers of workmanship issues are identified.

Short-term relocation

All short-term relocations (e.g. decants) will be based on the principle of avoid displacement, preserve family routines, and minimise costs for all parties, but while ensuring tenants are safe and secure.

Where possible, we will look to provide tenants with choice: payment equivalent, compensation, food deliveries and temp leisure centre

membership to cover showering facilities. This could include changing how the home is used with replacement services including Air filters, dehumidifiers, portable toilets, space heaters, room segregation and temporary fixes.

We will minimise the use of Short-term relocations, however, there will be times when the property cannot be made safe and it is not safe to stay in the property. The Decant Policy will apply in these situations.

Assessment, Inspection & Triage

We will:

- Use trained surveyors and/or housing officers to carry out the hazard assessments and assign the appropriate priority.
- Apply the Housing Health and Safety Rating System (HHSRS) to determine severity and risk. The classification of the Severe, Moderate or Slight HHSRS risks are defined in a separate document that provides examples of failures for each of the 29 categories. This reference document will be independently validated and help to ensure a consistent HHSRS classification.
- The person-centred element of the HHSRS classification will be applied by increasing the standard classification by one grade if a property contains vulnerable tenants. The definition of vulnerable tenants include:
 - Elderly or frail individuals.
 - People with disabilities – physical, sensory, or learning.
 - People with mental health conditions.
 - Victims of domestic abuse.
 - Children (longest child <18 years old).
 - Pregnant mothers.
 - People with substance misuse issues.
 - People at risk of homelessness or with a history of rough sleeping.
 - People experiencing financial hardship or fuel poverty.

Items we will repair

The repairs we are responsible for are set out in your tenancy agreement. We will keep in good repair and proper working order our installations for supplying water, gas, electricity, room and water heating and sanitation including basins, sinks, baths, and toilet fittings.

We will keep the structure and exterior of the property in good repair, including drains, gutters, and external pipes, as well as the lift service, where provided.

We will keep in good repair communal entrances, halls and stairways in flats, as well as any other areas for use by all tenants and their families and visitors. The outside of your home and communal areas of flats and maisonettes will be decorated and kept in good repair.

Tenant responsible repairs

Tenants are responsible for the cost of repairs that are a result of neglect, misuse, or deliberate, malicious, criminal or accidental damage by you, people living with you, or people visiting your home.

Damage caused by neighbours or the general public to items that are the responsibility of the tenant, will need to be covered by the tenant's house content insurance.

Tenants must keep the inside and outside of your home, including internal decoration, garage and any outbuildings, in a neat and tidy condition. You may be asked to repay any costs we have to pay for cleaning your home if you allow it to become dirty or infested with vermin.

Listed below are some of the repair and maintenance items which tenants must carry out or arrange themselves. Permission maybe required to complete some of these items.

- All internal decoration
- Replacing keys when you have lost them or broken them in the lock (unless fair wear and tear) or where you have locked yourselves out
- Getting extra keys cut, including radiator keys
- Replacing broken or cracked glass (unless this is due to criminal damage and a police crime number is given)
- Fitting curtain rails, coat hooks or pelmets and draught proofing to doors or windows
- Fitting extra door or window locks without a recommendation from the police, unless these were inadequate in the first place
- Adjusting doors when you have fitted new floor coverings.
- Replacing light bulbs, fluorescent tubes or starters*
- Testing smoke detectors (including any provided by us) or replacing batteries except for a communal system (Home Safeguard)*
- Resetting electrical trip switches*
- Getting chimneys swept if used for wood or a coal fire
- Filling minor cracks or holes in walls and ceilings
- Clearing basins, sinks, baths or toilets which have become blocked due to misuse

- Replacing toilet seats and flush chains, and plugs and chains on baths, basins or sinks
- Replacing clothes lines or restringing rotary driers (unless in a shared area)
- Maintaining garden paths or patios (except those leading to front or back doors or provided specifically for an existing disabled tenant) and any other general garden features (unless in shared areas)
- Keeping gully grids and wall vents clear of leaves and rubbish
- Replacing TV aerials and sockets (except for communal aerials)
- Disconnecting or reconnecting appliances such as cookers or washing machines.
- Installing extra electric sockets unless the number available is below the minimum standard
- Bleeding or venting central heating radiators.
- Fitting or replacing internal door latches, handles, chains or spy holes
- Repairing or replacing handles, catches or knobs on kitchen units
- Maintaining garden fencing not boarding public land and the property contains children (unless it is post and wire fence provided us).

In very exceptional circumstances we will arrange these repairs for extremely vulnerable tenants. This is at the discretion of EDDC.

Resident Engagement and Communication

We will:

- Clearly explain to tenants the repair policy via the website, tenant magazine, other engagement events and targeted digital communications.
- Provide updates at key stages: report received, inspection completed, works scheduled and works completed.
- Encourage feedback and complaints to drive service improvements.

Monitoring and Performance

We will track and report on the repairs performance using the Performance Framework. The monthly reporting will include:

- % of repairs completed within the target times scales for each milestone.

- Number of repairs completed within the target times scales for each milestone.
- Weekly tenant satisfaction insights with different elements of the repairs service.
- Number of HHSRS failures by classification and severity.

Monthly reports will be incorporated with the quarterly reporting ELT.

Training

All staff involved in housing management, repairs, and compliance will receive mandatory training on damp and mould, Awaab's Law, and risk-based triage. Other ongoing training will be provided to maintain the knowledge within the service.

Responsibilities

The responsibilities associated with the repairs are set out in the table below.

| Role | Responsibility |
|------------------|---|
| Repairs Team | <ul style="list-style-type: none"> - Ensure the policy reflects best practice. - Deliver repairs within legal timeframes and in accordance with this policy. |
| Housing Officers | <ul style="list-style-type: none"> - Identify risks, escalate issues, support vulnerable residents. |
| Planned Works | <ul style="list-style-type: none"> - Monitor repair performance and Delivery of planned works scheme prior to repair rates increasing to uneconomic levels. |
| Tenants | <ul style="list-style-type: none"> - Report issues promptly and allow access for inspections/repairs. - Complete the repairs they are responsible for completing. |

Equality Assessment

The equality assessment below aligns with the Public Sector Equality Duty under the Equality Act 2010 and ensures the policy does not inadvertently disadvantage any protected group.

| Characteristic | Relevant? | Potential Impact | Mitigation / Action |
|----------------|-----------|--|---|
| General | Yes | Understand the impact on different tenant cohorts | Monitor repairs and complaint performance by tenant profile and asset archetypes. Regular engagement with Tenant engagement events and scrutiny groups. |
| Age | Yes | Older tenants may be more vulnerable to cold, disrepair or | Prioritisation of repairs for vulnerable residents; proactive |

| Characteristic | Relevant? | Potential Impact | Mitigation / Action |
|--------------------------------|------------------|---|--|
| | | inaccessible services. | monitoring of sheltered schemes; |
| Disability | Yes | Tenants with mobility, cognitive or sensory impairments may struggle to report or manage repairs. | Home visits for inspections; prioritisation of adaptations. Support from MSO's. |
| Gender Reassignment | Possibly | No specific impacts identified, but privacy concerns or discrimination risk in interactions. | Staff training in equality, privacy, and respectful service delivery. |
| Marriage and Civil Partnership | No | Unlikely to be directly affected | NA |
| Pregnancy and Maternity | Yes | Expectant or new mothers may be more affected by damp, heating or unsafe conditions. | Risk-based prioritisation will include pregnancy and infants as vulnerability factors. |
| Race | Yes | Language barriers or cultural differences may impact understanding of repair obligations or communications. | Use of translation services, multilingual documents, and cultural awareness training. |
| Religion or Belief | Possibly | Appointment scheduling or home access may be sensitive around religious practices. | Flexible appointment options; staff awareness of cultural norms. |
| Sex | Possibly | Lone female tenants may feel unsafe during contractor visits. | Use of ID checks, chaperone option, and staff/contractor conduct policies. |
| Sexual Orientation | Possibly | Risk of discrimination during in-home services. | Contractor and staff equality and diversity training; anonymous complaints process. |

Continuous Improvement and Review

This policy will be reviewed within 3 years of the publish date or sooner if:

- Regulations change.
- Serious service failure occurs.

- Feedback or data suggests improvement is needed.
- Opportunities are identified to improve the policy, and ultimately the service delivered to customers.

3 Policy Administration

Appendices and other relevant information

Enter appendices and other information

Links related Policies/Strategies, Procedures and Legislation

This policy is associated with the following other policies/strategies:

- Tenant Engagement Strategy
- Health and Safety Policy
- Complaints Policy
- Decant Policy

Data Protection

Provide a general view of what personal data is to be used and how and provide a link to the [Council's Data Protection Policy](#) and reference the relevant privacy notices.

b) The collection and use of tenant's personal data will not exceed that agreed to in their tenancy agreement

If selecting option c) – please provide a summary of additional personal data required and how this will be obtained and used below.

Click or tap here to enter text.

The [EDDC Data Protection Policy](#) provides further information on how we store and use personal information.

The following privacy notice(s) provide further information on how we will use tenant's personal data, how it is gathered, and how long we will retain this information, and what rights tenants have in relation to this.

Property and Assets - Completion of programmed, servicing and cyclical works

Choose an item.

Choose an item.

Choose an item.

Choose an item.

Choose an item.

All our privacy notices can be found on the EDDC website

(<https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>)

Policy consultation

Listing which committee has agreed the publication of this policy, such as SMT+, Cabinet, HRB or Joint Staff Forum

Policy review

The Corporate Lead for Property and Assets is responsible for the policy. The policy will be reviewed in March 2028.

Report to: Housing Review Board

Date of Meeting 30th July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release NA



Radon Policy for Housing

Report summary:

The following report presents a proposed Radon Policy for Housing to meet East Devon District Council's regulatory compliance and health and safety obligations. The proposed policy aligns with the Housing Act 2004 and other related legislation.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

1. The Housing Review Board to recommend to Cabinet that they approve the proposed Repairs Policy.
2. That the Housing Review Board note some final amends may be made following further feedback from tenant scrutiny and stakeholders (Commitment to bring the Policy back to HRB should any material amends be required).

Reason for recommendation:

By approving this policy East Devon District Council will be ensuring legal compliance and will be providing our customers with a healthy and safe home to live in as well as a safe environment for our employees and contractors to work in.

Officer: Marc Taylor, Compliance Surveyor

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk; The key risks are outlined in section 5 of this report.

Links to background information [UKradon - Home](#)

[Housing Health and Safety rating System](#)

Link to [Council Plan](#)

Priorities (check which apply)

- ☐ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Radon Policy for Housing

Background / Context

1. The Radon policy for Housing is a new policy that needs to be approved and implemented so East Devon District Council can manage the risk of Radon exposure to tenants, employees, members of the public and any other persons that reside or enter East Devon District Council's domestic properties and meet legal health and safety compliance.
2. East Devon District Council has a responsibility to their tenants under the Duty of Care and the Housing Act 2004 to provide a safe home. Radon (a naturally occurring radioactive gas) is identified as a potential hazard in dwellings in the Housing Act 2004. The need for action is defined by the Housing Health and Safety Rating System (HHSRS) which applies a numerical score to the different hazards depending on their overall risk to the occupant. If the score exceeds certain trigger points the local housing authority (Local Authority) is obliged to act. The Local Authority must take the appropriate enforcement action' which is dependent on the severity of the risk. The measured annual average radon level is used to calculate the risk.

Radon Policy for Housing

3. **'Appendix A - Radon Policy for Housing 2025'** is the proposed Radon Policy for Housing.
4. The Radon policy is based on a person centred and risk-based approach that will enable EDDC to balance cost, performance and risk. This approach aligns with the requirements of The Housing Act 2004 and other relevant legislation.

Risks

5. The key risks associated with the proposed Radon Policy for Housing include:

| Ref | Risk | Mitigation Measure | Residual Risk |
|-----|--|--|---------------|
| 1 | Tenant's exposure to levels of Radon gas above the action level as defined by UK Health Security Agency. | Testing will be undertaken on a phased approach in properties that have been highlighted in Radon affected areas (as per the UK Health and Security Agency spreadsheet, 1481 in total). Properties above the action limit will | High |

| Ref | Risk | Mitigation Measure | Residual Risk |
|-----|--|---|---------------|
| | | have remedial works / mitigation devices installed to reduce Radon to the target level. | |
| 2 | Refusal from tenants for testing and mitigation. | No access policy/legal enforcement to be utilised. Section 4.10 of the council's tenancy agreement states that tenants must allow employees, contractors or representatives reasonable access to their home for the purpose of dealing with health and safety issues. | High |
| 3 | Tenants turning off mitigation devices due to additional unforeseen electricity costs and The Cost of Living Crisis. | Costs to be discussed with tenants with full transparency. EDDC to decide if EDDC will pay for the running costs? | High |
| 4 | Rise in complaints to East Devon District Council once tenants are informed of the risks associated with Radon. | Full transparency and communications revolving around Radon awareness. A tenant awareness radon leaflet will be uploaded to The East Devon District Council website along with The Radon Policy for Housing 2025. The Tenant Handbook and Welcome Pack will also include a section relating to radon awareness. Communications will be supplied to tenants on how to operate any installed radon mitigation devices and the costs incurred with their operating costs. Radon Compliance can also be delivered at the East Devon District Council Tenant Hub. | Medium |
| 5 | Increase in demand for tenant decants due to excessively high levels of Radon gas above the action level. | | Medium |

Next Steps

6. The application of the new Radon Policy for Housing will be supported by the following next steps:
 - a. A procurement plan will be prepared for the tendering of a testing and mitigation contract.

- b. A communications strategy for Radon will be compiled for how the risk will be raised with customer groups.
- c. A tenant awareness radon leaflet to be compiled, this will be uploaded onto the EDDC webpage as soon as the policy is approved along with The Radon Policy for Housing 2025.
- d. Radon information will be compiled for The Tenant Handbook and Welcome Pack.
- e. A Radon Compliance Presentation will be prepared which can be delivered at the East Devon District Council Tenant Hubs.

Financial implications:

2025/26 included a new budget line for Radon. Future budgets will consider the implications of the final Radon policy.

Legal implications:

The Housing Act 2004, and other associated legislation, makes clear Landlord responsibility in relation to Radon and management of the associated risks. It is important, therefore, that we have plans in place to ensure compliance.

East Devon District Council

Radon Policy for Housing

| Issue details | |
|----------------------|-----------------------------------|
| Title: | Radon Policy for Housing |
| Version number | Version 1.0 |
| Officer responsible: | Marc Taylor – Compliance Surveyor |
| Authorisation by: | |
| Authorisation date: | |

1. Why has the council introduced this policy?

Radon is the single biggest source of natural radiation exposure to the UK population, accounting for around 50%. Radon is a colourless, odourless natural radioactive gas formed by the radioactive decay of the small amounts of uranium that occur naturally in all rocks and soils. In outside air the levels are low but it can accumulate inside buildings to above the recommended levels for domestic properties. Radon is also the second leading cause of lung cancer after tobacco smoking.

This document represents East Devon District Council's commitment, in line with the Housing Act 2004, where a Duty of Care is defined to assess and minimise any potential radon exposure as part of the Housing Health and Safety Rating System (HHSRS).

As an employer, East Devon District Council also has a Duty of Care to ensure the health, safety and welfare of employees and contractors who have access to any of the domestic portfolio. The Duty of Care exists under The Health and Safety at Work Act 1974 and the Management of Health and safety at Work Regulations 1999. The Ionising Radiation Regulations 2017 also apply if radon exceeds a defined level.

2. What is the council's policy?

Scope

This Radon Policy covers the assessment and management of radon in East Devon District Council housing properties. It specifically excludes all other properties to which East Devon District Council have responsibility (Property Services, Street scene, Corporate Estates).

Introduction

The amount of radon is measured in becquerels per cubic metre of air (Bq/m³). The average level in UK homes is 20 Bq/m³, but given the geological make-up of parts of Devon, a higher background level of radon can exist. As a result, East Devon District Council recognises that

some of its stock may contain higher than the national average levels of radon and will periodically test to quantify the levels. The UK has been extensively surveyed by the UK Health Security Agency (previously known as Public Health England, PHE) and British Geological Survey and the Indicative Atlas of Radon in England and Wales (see 4 Appendices, Appendix 1.) shows that parts of East Devon is a Radon Affected Area. The Health Security Agency defines Radon Affected Areas as those with 1% probability or more of a home having radon above the Action Level.

UK Health Security Agency (UKHSA) recommends that radon levels should be reduced in homes where the average is more than 200 Bq m⁻³, this level is known as the radon Action Level and has been endorsed by the Government. The UKHSA further recommends a target level for domestic properties of 100 Bq m⁻³. This document should be used in conjunction with any relevant legislation, Approved Codes of Practice, Health and Safety Executive (HSE), UK Health Security Agency (UKHSA) – UKradon guidance and other recognised procedures relating to the presence of radon in buildings.

Policy

This policy supplements the East Devon District Council Health & Safety Policy Arrangements and commitment to Health and Safety by complying with the requirements of the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. In securing this compliance, East Devon District Council will be ensuring legal compliance and will be providing our customers with a healthy and safe home to live in as well as a safe environment for our employees and contractors to work in.

As owners and managers of property, East Devon District Council have a duty of care to ensure that staff and the public can use the relevant buildings and facilities safely. This extends to ensuring that staff and the public are safe from risks associated with radon.

East Devon District Housing will take a risk-based, proportionate, and evidence-led approach to identifying, assessing, mitigating, and monitoring radon gas across its property portfolio. This will be integrated into our overall compliance and asset management framework.

East Devon District Council are committed to:

1. Identifying those properties within the housing stock that fall in geological areas considered to be at potential risk of having radon gas levels above the actionable levels.
2. Protecting, as far as reasonably practicable, tenants, staff, contractors and visitors to East Devon District Council housing properties (owned or managed) from exposure to radon gas above the actionable levels.
3. Providing adequate and timely resources in support of this Radon Policy and to enable its effective implementation.
4. Undertaking a programme to measure, so far as is reasonably practicable, radon concentrations in East Devon District Council housing stock considered at potential risk above the actionable levels.
5. Maintaining a Radon Register of all results following monitoring within those properties at risk and make it freely accessible to those undertaking work on East Devon District Council housing properties.
6. Implementing and maintaining an effective Radon Policy having identified and measured the radon levels.

7. Implementing and maintaining any necessary remedial work and/or equipment where radon levels have been identified above the action level.
8. Promote awareness of the risks from radon to tenants and through training and induction of relevant staff and contractors.
9. Appoint a competent and suitably qualified person to oversee the implementation of the Radon Policy. This role will be undertaken by the Cyclical Servicing and Compliance Manager.
10. Only engage appropriately trained, qualified and competent persons to undertake any work as part of the Radon Policy. This includes measurement, interpretation and remedial action.
11. Regularly review the Radon Policy.
12. It is noted that the Building Regulations 2000 (Schedule 1 Part C) has required all new build homes to incorporate radon mitigation measures such as radon barriers and no additional testing will be conducted except in line with the procedure as below.

3. Policy Administration and Procedure

Identification and Risk Assessment

- East Devon District Council will maintain an up-to-date property database overlaid with UKHSA radon maps.
- Prioritise testing in radon-affected areas as defined by UKHSA (in properties >1% risk).
- Undertake risk assessments for workplaces in accordance with IRR17.

When we will test

- EDDC housing will be risk assessed to identify the potential for the presence of radon gas. The assessment will refer to the UK Health Security Agency's Indicative Atlas of Radon in England and Wales, which indicates the likely extent of the local radon hazard in all buildings within 1km grid squares.
- We will approach the UKHSA with a comprehensive list of all our domestic properties and they will provide us with a Risk Profile. EDDC can then formulate a plan as to which properties are situated within higher risk areas and require testing first. The UKHSA's Indicative Atlas of Radon is periodically updated, this will require EDDC to reassess the Risk Assessment and put a plan in place to test any previously untested properties that now fall within areas with higher radon levels. This should be reviewed on an annual basis.
- Where identified, premises that reside within shaded areas will as part of the risk assessment be monitored for the potential for radon gas. In non shaded areas only those properties with habitable basements will be considered on an independent basis.

- If East Devon District Council purchases a property constructed prior to 2000 and is situated within a radon affected zone, a Radon test will be conducted as part of the acquisition process.
- Homes that undergo major renovation / refurbishment.
- If a customer expresses concern about radon levels within their home that has not been tested. If the property is situated within the <1% region on The Radon map, East Devon District Council are not required to undertake testing as this is stated as a non-affected radon area. The cost will be covered by the tenant if they wish to undertake testing.

How we will test

- A test by UKradon or an independent specialist will be arranged; radon measurements are carried out with two detectors (in a bedroom and living room) over three months, to average out seasonal variations. This method provides around an 80% success rate for results as opposed to postal detectors with a 40-50% success rate.
- If the test result is below the Action Level of 200 Bq/m³ no further action will be taken.
- If the test result is above the Action Level of 200 Bq/m³, action will be taken to reduce it, designing for the Target Level of 100 Bq/m³.
- Properties that are identified during monitoring to reach or exceed the Action Level will be assessed and surveyed. Remediation and mitigation will be implemented/installed as promptly as reasonably practicable. In the meantime, East Devon District Council will assess, consider and (where deemed applicable and appropriate) decant residents until radon levels are reduced to the 'Target Level' (100 Bq/M³) or as low as reasonably practicable.

Remedial measures and further testing

- EDDC will implement remedial measures if the test result is above the Action Level of 200 Bq/m³.
- A re-test will be undertaken immediately after any remedial measures to confirm that the remedial measures are effective.
- If levels remain above 200 Bq/m³, further action will be taken to reduce it, designing for the Target Level of 100 Bq m³, re-testing and acting as necessary to achieve this
- If the result of a radon assessment is between the Target and Action Levels, further action to reduce the level will be considered, especially if there is a smoker or ex-smoker in the home.
- Where radon levels have previously required mitigation works, EDDC will undertake a 5-year cycle of re-testing to confirm ongoing effectiveness of these radon-reducing measures. Any radon fan maintenance will be undertaken as per the manufacturers specifications or as specified by the independent specialist.
- A record of all radon test results will be maintained for future reference and comparison: A Radon Register will be implemented on East Devon District Councils Housing Management System.

As active ventilation can be significantly more expensive to install, run and maintain, passive forms of ventilation will be considered as a priority, but each property will be assessed for the most likely and successful form of remedial action based upon testing results and radon levels.

The remedial measures most installed and dependant on the construction of the property are:

- Natural or Active under-floor ventilation
- A Passive Radon Sump with Mushroom or Driven Cowl
- An Active Radon Sump with an electrically powered fan
- Positive Input Ventilation system

Once installed, all remedial installations will require routine servicing and maintenance to ensure they are in safe working order and still providing the correct level of hazard control. East Devon District Council will ensure all remediation controls and mitigation measure installations, and their subsequent inspections, servicing and maintenance are carried out by its appointed and competent contractor.

Due to the health risks associated with a reading above the Action Level of 200 Bq/m³, customers will not have the option of refusing remedial measures.

East Devon District Council are understanding of the increase in the cost of living and energy costs and the potential for tenants to be concerned with the extra resources associated with new electrical equipment that is installed in their home. We will aim to install passive systems where possible to reduce costs to our tenants. It would also be noted; there may be circumstances where running noise and internal draughts can be an issue with certain needs and health conditions of tenants. When considering any remedial measures EDDC will work with the independent radon specialist to find the most appropriate and cost-effective solution.

Procedure if tenant refuses access to the property for testing or refuses mitigation system installation

The tenant must co-operate fully by allowing access for any testing or mitigation to be undertaken by East Devon District Council. Due to the health and safety risks to the tenant/occupiers, The Council reserve the right to seek legal action and/or use reasonable force to enter the property. East Devon District Council's "No Access Policy" will be used to enforce access to properties.

The East Devon District Council Tenancy Agreement section 4.10 states:

Access to your home

Allowing access to your home to contractors and representatives

You must allow our employees, contractors or representatives reasonable access to your home for the purpose of:

- inspecting its condition
- doing repairs or improvements to the property or an adjoining property
- carrying out tenancy reviews
- dealing with any health and safety issue which may include but is not limited to
- the annual safety inspection and servicing of the Council's gas appliances and solid fuel appliances
- annual servicing of alarms and telecare devices (if fitted)
- servicing of stair lifts
- Legionella testing and asbestos checks
- testing and maintenance of electrical, smoke and carbon monoxide alarms

- fire risk assessments

Governance and Assurance

- Radon compliance status will be reported to the Board / Executive Team annually
- Radon management will be included in the Compliance Audit Programme
- This policy will be reviewed every three years or in response to regulatory change

Tenant Communication and Awareness

- A tenant awareness radon leaflet will be uploaded to The East Devon District Council website along with The Radon Policy for Housing 2025.
- The Tenant Handbook and Welcome Pack will also include a section relating to radon awareness.
- Communications will be supplied to tenants on how to operate any installed radon mitigation devices and the costs incurred with their operating costs.
- Radon Compliance can be delivered at the East Devon District Council Tenant Hub

Roles and Responsibilities

Responsibilities for ensuring the effective implementation and operation of this policy:

Director

- Monitor and oversee radon management
- Report to the CEO as required

Corporate Lead for Property and Assets

- Oversight of radon risk strategy and investment planning
- Monitor and ensure the policy framework is applied locally.
- Ensure sufficient resources are available for effective procedures to support the policy.
- Provide sufficient training to ensure all relevant staff are competent.
- Ensuring adequate management arrangements are in place to support the policy.
- Provide reports and recommendations to Strategic Directors as required.

Compliance Manager

- Delivery of testing programme and legislative compliance
- Develop workable strategy for the management and support of this policy and procedures.
- Monitor the local management arrangements and make sure they are suitable and sufficient.
- Provide reports and recommendations to Service Leads as required.
- Assist and advise local management as required.

- Ensure that the competency of the Compliance Surveyor is suitable, sufficient, appropriate and relevant.

Compliance Surveyor

- Comply with local policies, procedures and protocols, as well as associated regulations and guidance.
- Regularly review the policy and implement alterations as required.
- Undertake any required training to support their role, maintain competence and up-to-date knowledge.
- Ensure that any training undertaken by employees is suitable, appropriate and implemented.
- Management of contracts, contractors and other appointed agents. Oversee and manage their performance.
- Oversee and manage the testing, maintenance, and compliance systems.
- Carry out remedial actions when requested.
- Oversee and manage access to properties and timely execution of East Devon District Councils "No Access Policy"
- Monitor the local management arrangements and make sure they are suitable and sufficient.
- Ensure that monitoring, testing and controls are carried out in a timely and efficient manner.
- Provide reports and recommendations to the Compliance Manager and Corporate Lead as required.
- Undertake their duties to support the policy.
- Ensure that they understand current UK Legislation and East Devon District Councils Housing statutory duty. Monitor legislative changes and implement necessary actions, including amending the policy, are implemented.
- Oversee implementation of radon monitoring surveys.
- Undertake and review risk assessments
- Maintain an effective record system.
- Ensure verification and evidence of compliance is centrally available.
- Ensure the Health, Safety and Wellbeing of contractors, East Devon District Council's officers and any other appointed agents acting in accordance or in support of this policy.
- Provide any relevant training to East Devon District Council staff
-

Employees

- Comply with East Devon District Council's policies, procedures and protocols, as well as associated regulations and guidance.
- Undertake any required training to support the policy and their role.
- To undertake their duties to support the policy.
- To liaise, where necessary, with the Compliance Surveyor and/or Compliance Manager.
- Undertake their duties to support this policy and carry out remedial actions when requested.
- Report any identified hazards or concerns to the Compliance Surveyor or Compliance Manager.

Contractors

- Undertake testing and mitigation in accordance with current legislative standards
- Cooperate with East Devon District Council to install the most practical and cost-effective remediation to properties.
- Undertake regular meetings and adhere to contractor specific Key Performance Indicators.
- Provide an efficient and cost-effective service.

East Devon District Council Housing Residents and leaseholders

- Follow the guidance supplied regarding radon safety within the property by East Devon District Council, HSE and UK Health Security Agency (UKHSA) – UKradon.
- Cooperate with East Devon District Council and appointed contractors to comply with radon testing measurements, remedial mitigation works and regular servicing of equipment/installations.
- Not to interfere or misuse radon testing apparatus or equipment/plant used or installed as remedial controls.
- Report any changes in the building that might affect radon levels and advise of any faults with radon mitigation installations.

4. Appendices and other relevant information

UK Health & Security Agency including Maps of Radon

<https://www.ukradon.org/information/ukmaps>

Building Research Establishment

<https://www.bre.co.uk/radon>

5. Related Policies/Strategies, Procedures and Legislation

Housing Act 2004 – Inspections and assessment of hazards

<https://www.gov.uk/government/publications/hhsrs-operating-guidance-housing-act-2004-guidance-about-inspections-and-assessment-of-hazards-given-under-section-9>

Housing Health & Safety Rating System

[Housing health and safety rating system \(HHSRS\): guidance for landlords and property-related professionals - GOV.UK](#)

UK National Radon Action Plan

[UK National Radon Action Plan - GOV.UK \(www.gov.uk\)](#)

The Health & Safety at Work Act 1974

[Health and Safety at Work etc. Act 1974](#)

The Management of Health & Safety at Work Regulations 1999
[The Management of Health and Safety at Work Regulations 1999](#)

The Ionising Radiations Regulations 2017
[The Ionising Radiations Regulations 2017](#)

East Devon District Council – No Access Policy

6. Data Protection

b) The collection and use of tenant's personal data will not exceed that agreed to in their tenancy agreement

The [EDDC Data Protection Policy](#) provides further information on how we store and use personal information.

The following privacy notice(s) provide further information on how we will use tenant's personal data, how it is gathered, and how long we will retain this information, and what rights tenants have in relation to this.

Property and Assets - Completion of programmed, servicing and cyclical works

Choose an item.

Choose an item.

Choose an item.

Choose an item.

Choose an item.

All our privacy notices can be found on the EDDC website (<https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices/>)

7. Policy Consultation

Listing which committee has agreed the publication of this policy, such as SMT+, Cabinet, HRB or Joint Staff Forum

8. Policy date for review and responsible officer

To ensure that compliance with the assessment and management of radon is being maintained a review will be conducted at least every 3 years (or when circumstances indicate that the procedures contained in the policy are no longer relevant and require revision following events occurring on the EDDC demise) by the Responsible Person. This review will be documented and actions identified, where required, to ensure the continuing adequacy of

the Radon Policy to comply with the duty to assess and manage the risk. If appropriate, EDDC may commission a third-party consultant to assist in the updating of the plan.

Report to: Housing Review Board

Date of Meeting: 31st July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Tenancy Services Performance Report 2025/26 Q1

Report summary:

The following report outlines the Tenancy Services element of the Housing Service's performance through quarter 1 of FY 2025/26. The report covers the Rentals, Estate Management and Sheltered Housing functions within Tenancy Services.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

The Housing Review Board receives the report and our performance at end of quarter 1, 2025/26

Reason for recommendation:

To ensure the Housing Review Board have assurance around service delivery and performance.
To enable the Board to scrutinise and challenge the performance of Tenancy Services.

Officer: Darren Hicks, Tenancy Services Manager (Regulated Services)

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk

Link to [Council Plan](#)

Priorities (check which apply)

- ☐ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☐ Financially secure and improving quality of services

Financial implications:

There are no direct financial implications from the recommendations in this report.

Legal implications:

There are no legal implications on which to comment

1. Understanding This Report

1.1. The data presented in this report is colour coded in a traffic light system. Green means we are meeting or exceeding our targets, amber that we are close to target, and red means we are outside of target.

1.2. Targets are set annually and are our benchmark for where we would like our performance to be.

1.3. Top Quartiles are the benchmark figures from Housemark, which tells us whether or not we are in the top 25% of best performing landlords.

1.4. The 'Final 24/25' data shows us where our performance was at the end of the last financial year, which gives us an indication of how we are doing compared to last year's performance.

2. Housing Rental: General Overview

2.1 Infographic; Income Management.

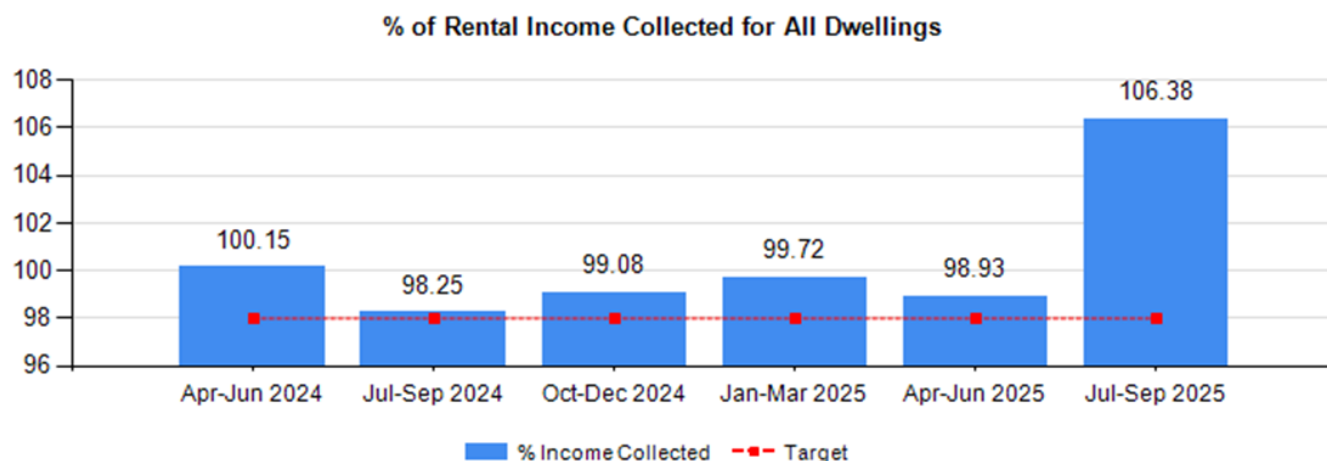
Housing Service Performance

(as at 1-Jul-2025)

● Within Target, ● Close to Target, ● Outside Target, ■ Cumulative Measure, ↓ Minimum Target, ↑ Maximum Target, GF General Fund

| TABULAR SUMMARY 2025/26 | | | | | | | | | | |
|-------------------------|--|---------------|--------------|-------------------------|--------------|--------------|----------------------|--------------|----------------|--------------|
| PI Code | Performance Indicator | Final 2024/25 | Q1 (Apr-Jun) | Q2 (Jul-Sep) Partial | Q3 (Oct-Dec) | Q4 (Jan-Mar) | July 2025 Partial | Year To Date | 2025/26 Target | Top Quartile |
| INCOME MANAGEMENT | | | | | | | | | | |
| IM01 | % of rental income for all dwellings that was collected | 99.72 | 98.93 | 106.38 | N/A | N/A | 106.38 | 106.38 | 98 | 100.2 |
| IM01(a) | % of rental income for general needs housing that was collected | 99.82 | 98.89 | 106.86 | N/A | N/A | 106.86 | 106.86 | 98 | 100.2 |
| IM01(b) | % of rental income for sheltered housing that was collected | 99.51 | 99.03 | 105.43 | N/A | N/A | 105.43 | 105.43 | 98 | 100.2 |
| IM02 | Rent arrears of current and former tenants as a % of annual rent debit | 1.71 | 1.69 | 1.69 | N/A | N/A | 1.69 | 1.69 | 2.53 | 3.45 |
| IM03 | Rent arrears of current tenants as a % of annual rent debit | 1.36 | 1.34 | 1.34 | N/A | N/A | 1.34 | 1.34 | 1.82 | 2.38 |

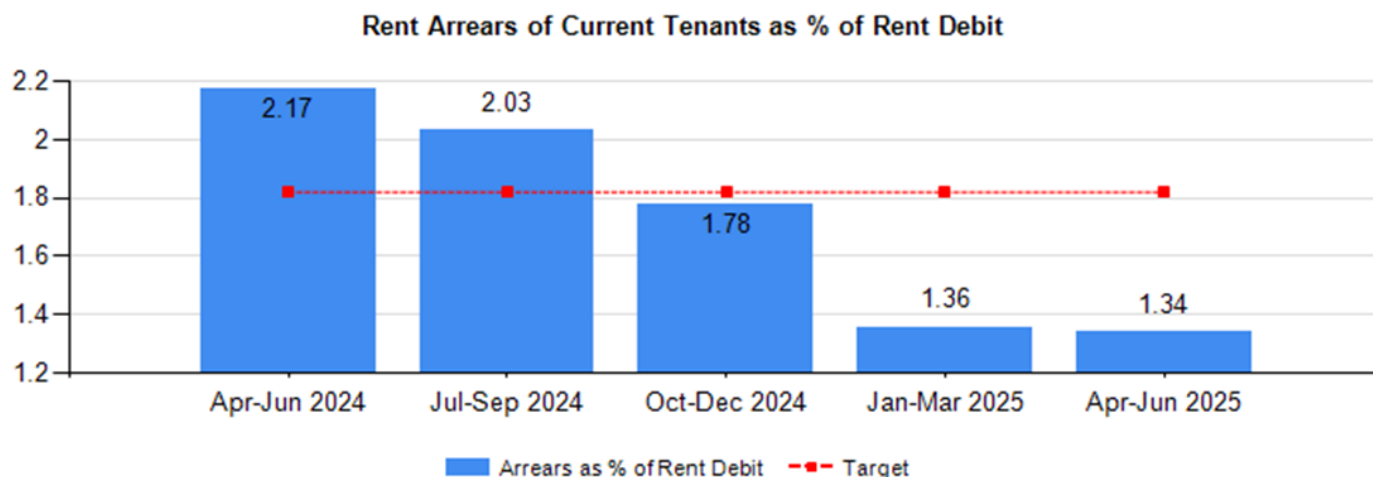
2.2 Infographic; % of income for all dwellings that was collected.



2.3 As can be seen we collected 98.93% of rent in Q1 of 2025.26, which is above target.

Narrative from our Housing Rentals Manager *“Rent collection rates fluctuate constantly and will be highest when we have our biggest input of Direct Debits on the first of the month. Debits are only charged weekly whereas the DDs are monthly, so a larger percentage of income will show at the start of each month than at the end of the month in general. It is over 100% as we also collect for former tenancies, which although have no ongoing debit to record against will still count towards any income for whatever period the money comes in”*

2.4 Infographic; Rent arrears of current tenants as a % of annual rent debit



2.5. The key indicator for our performance in relation to Income is the Council's rent arrears for current tenants as percentage of the annual rent we should be receiving.

2.6. If all our current tenants paid 100% of their rent and service charges for the quarter, we would receive a total income of £5,731,529.75. Whilst of course we would like all our tenants to be paying all of their rent and charges, it is expected by all landlords that for various reasons there will be those tenants who cannot or do not meet with their obligations to pay.

2.7. At the end of Quarter 1, we have a current tenant rent % arrear figure of 1.34% which equates to £76,802.49.

2.8. Our target for current tenant rent arrears is to be at, or below, 1.82%. Therefore, the figure of 1.34% is extremely positive and demonstrates high performance from our Rentals team.

2.9. The top quartile for this area is 2.38%, therefore you can see that we are firmly seated as performing in the top 25% of landlords nationally and are beating this industry benchmark by over 1%.

3. Estate Management: General Overview

3.1 Infographic; Tenancy Management

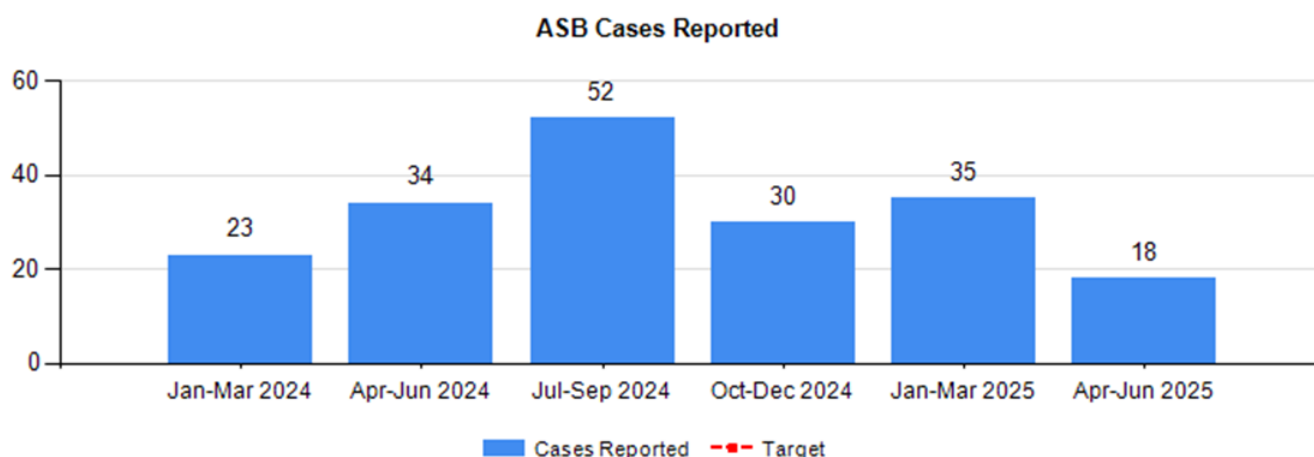
Housing Service Performance

(as at 1-Jul-2025)

● Within Target, ● Close to Target, ● Outside Target, ■ Cumulative Measure, ↓ Minimum Target, ↑ Maximum Target, GF General Fund

| TABULAR SUMMARY 2025/26 | | | | | | | | | | |
|---------------------------|---|---------------|--------------|--------------|--------------|--------------|-----------|--------------|----------------|--------------|
| PI Code | Performance Indicator | Final 2024/25 | Q1 (Apr-Jun) | Q2 (Jul-Sep) | Q3 (Oct-Dec) | Q4 (Jan-Mar) | July 2025 | Year To Date | 2025/26 Target | Top Quartile |
| TENANCY MANAGEMENT | | | | | | | | | | |
| TM04 | Number of ASB cases reported | 151 | 18 | 0 | N/A | N/A | 0 | 18 | N/A | - |
| TM05 | Number of evictions | 10 | 3 | 0 | N/A | N/A | 0 | 3 | 0 | 0 |
| TM07 | Number of current Decants | 8 | 9 | No Data | N/A | N/A | No Data | 9 | N/A | - |
| TM08 | % of 6 monthly Estate Inspections completed | 58.45 | 40.53 | 40.73 | N/A | N/A | 40.73 | 40.73 | 100 | - |

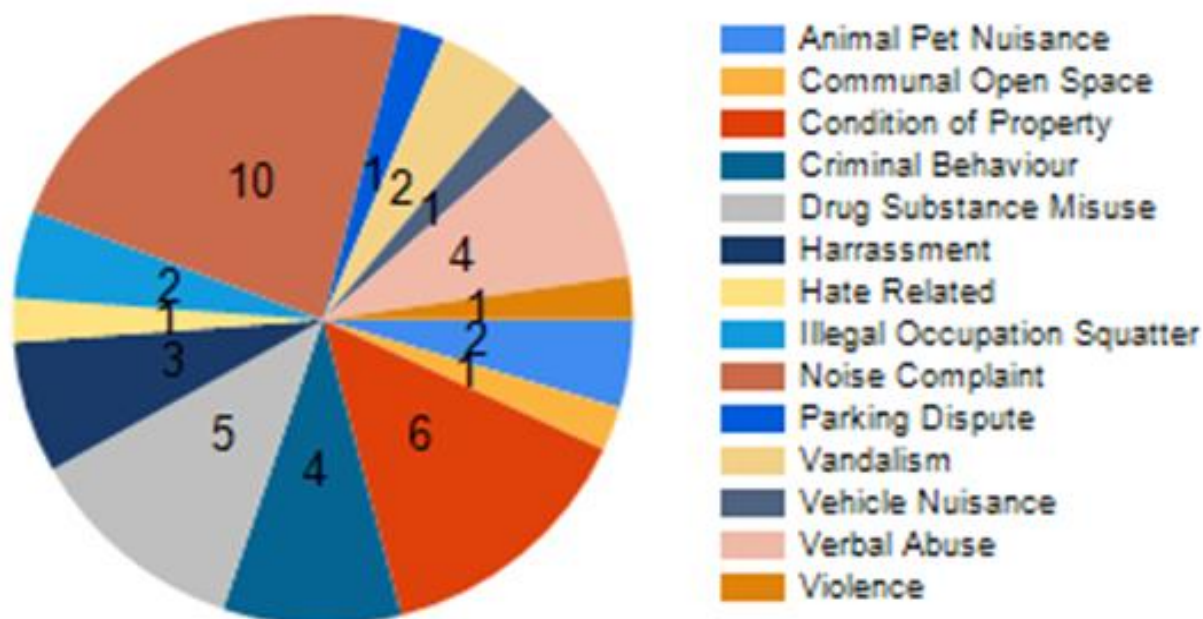
3.2 Infographic; The number of ASB Cases Reported



3.3 Whilst there is a reduction in the number of cases reported in Q1, there are 43 Open ASB Cases that the Estates team are currently dealing with. This involvement can range from monitoring through to preparing court paperwork for Legal Services to commence legal proceedings.

3.4 Infographic; Open ASB Cases

Open ASB Cases by Category



4. Estate Management: Decants

4.1 EDDC Tenants decanted to temporary accommodation is 9 Households.

4.2 The tenants decanted are a mixture of general needs and sheltered tenures.

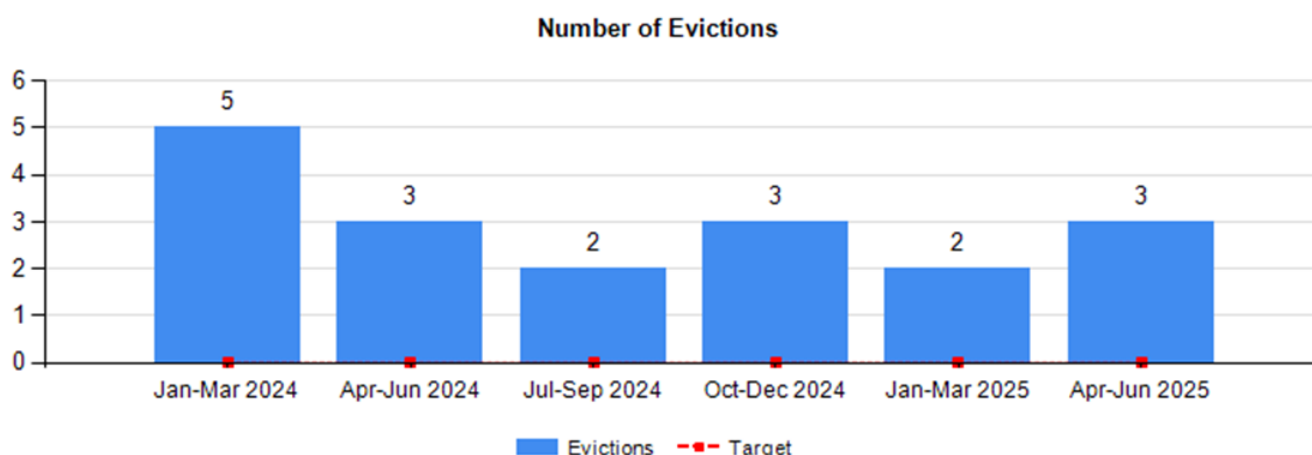
4.3 The primary reason for the decanted tenants is due to the condition of property.

4.4 Work is currently underway to identify EDDC properties that can be used as decant accommodation thereby reducing the need to use costly temporary accommodation.

4.5 It is anticipated that whilst initial spend will be required to carpet and furnish these properties, the expenditure on temporary accommodation will be reduced over the financial year.

5. Estate Management and Housing Rental: Number of Evictions

5.1 Infographic; The number of Evictions

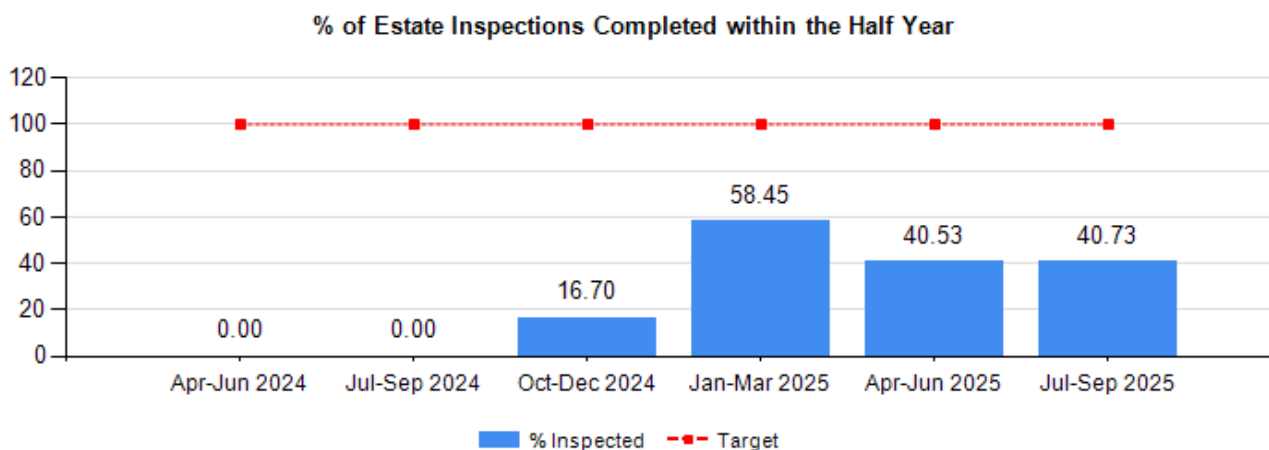


5.2 Of the 3 evictions in Q1, one of these was from EDDC permanent accommodation. Comments from the Rental Manager *"The tenant has been in a care home since November 2024, and the NOK who lived abroad had no Power of Attorney to end the tenancy. Rent arrears were building up as the tenant's monies were being used to fund the care home placement. We were awarded possession as there was no intention to return to the property due to ill health"*

The other evictions in Q1 were from households placed in temporary accommodation.

6. Estate Management: Estate Inspections

6.1 Infographic; % of 6 monthly estate inspections completed



6.2 The Estate Management team have a target of 100% estate inspections to be completed within the 6-month period. Estate inspections involve the Officers visiting every street in their geographical patch once every 6 months. This is to ensure that environmental concerns, that impact upon the quality of life for our tenants, are identified and resolved. It also enables to have a visible presence on our estates, fostering and nurturing further relationships with the community.

6.3 The Estates team are soon advertising a series of wider inspections, entitled Estate Walkabouts, where residents, members, agencies and officers can participate. Should any member of HRB wish to attend then please contact Sharon Buscombe, Estates Team Manager.

7. Sheltered Housing and Estate Management: Overview

7.1 Infographic; Tenancy Management (Sheltered and General Purpose Tenancies)

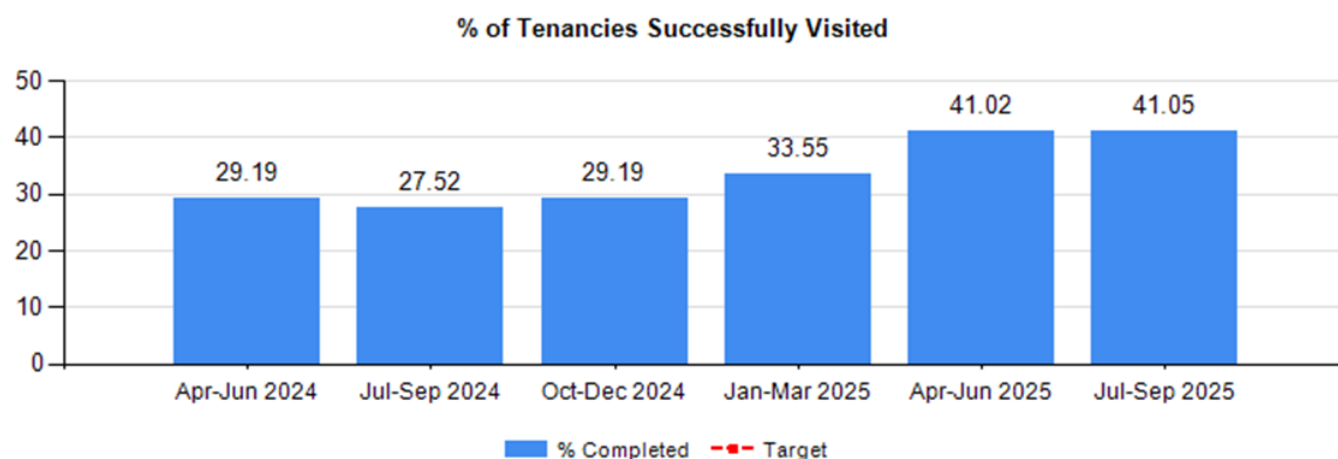
Housing Service Performance

(as at 1-Jul-2025)

● Within Target, ● Close to Target, ● Outside Target, ■ Cumulative Measure, ↓ Minimum Target, ↑ Maximum Target, GF General Fund

| TABULAR SUMMARY 2025/26 | | | | | | | | | | |
|---------------------------|---|---------------|--------------|--------------|--------------|--------------|-----------|--------------|----------------|--------------|
| PI Code | Performance Indicator | Final 2024/25 | Q1 (Apr-Jun) | Q2 (Jul-Sep) | Q3 (Oct-Dec) | Q4 (Jan-Mar) | July 2025 | Year To Date | 2025/26 Target | Top Quartile |
| TENANCY MANAGEMENT | | | | | | | | | | |
| TM06 | % of tenancy visits completed | 33.55 | 41.05 | 41.07 | N/A | N/A | 41.07 | 41.07 | - | - |
| TM11 | % of new tenancy visits completed in target | 7.66 | 57.01 | 0 | N/A | N/A | 0 | 57.01 | - | - |

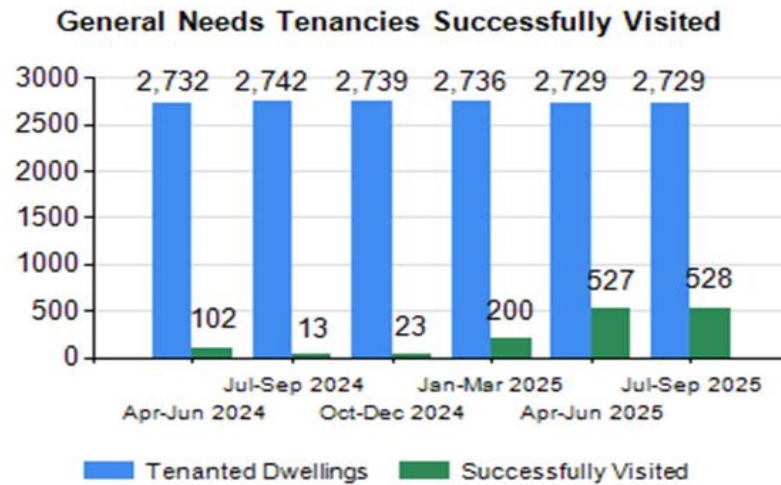
7.2 Infographic; % of tenancy visits completed



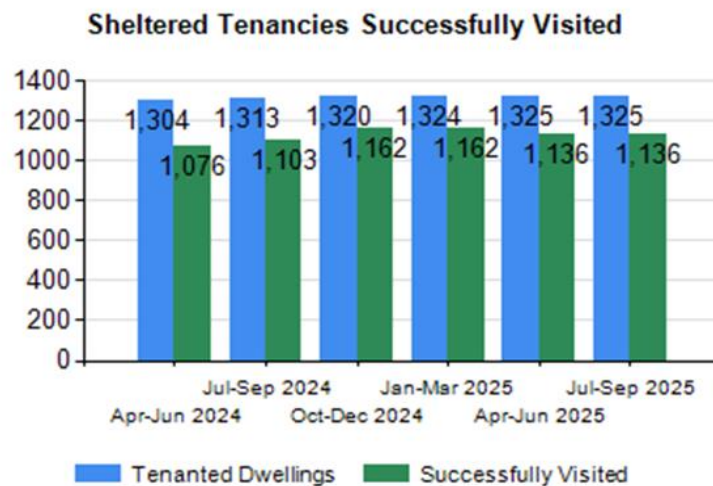
7.3 This is a joint objective for the Estate Management and Sheltered Housing teams. The purpose of the visits is to not only offer support to the tenants but to also identify any tenancy management issues, wellbeing/safeguarding concerns and issues of disrepair. Any changes to the tenant's situation are recorded on our systems. The target set for visiting our properties balances our tenant's rights to live peacefully in their homes, alongside our obligations to monitor our homes and our tenant's welfare, and finally married against industry best practice and the staff resource available to us.

7.4 Estate Management-The target is for 33% (910) of general purpose tenants to be visited every year, with the objective that each tenant will be visited every 3 years, where a tenancy audit will be completed. Of course we would like to undertake a tenancy audit with each tenant once a year but we do not have the resources within the Estates Team to achieve this.

7.5 In Q1 of 2025/26, 327 general needs tenants have been visited, and the Estates Team are on target, with 35.9% of the 910 tenancy audits completed.



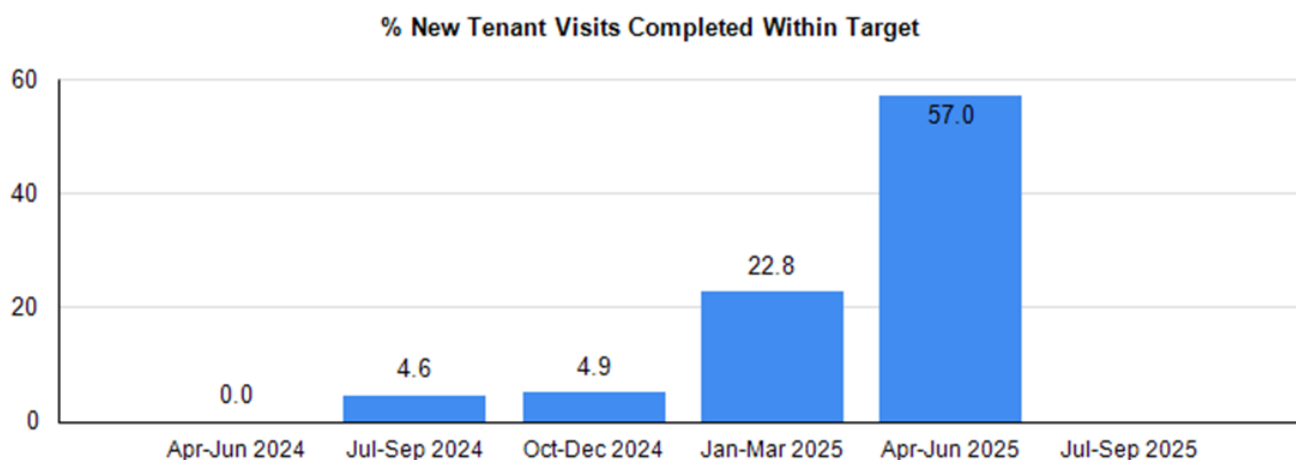
7.6 Sheltered Housing- The target is for 100% of sheltered tenants to be visited every year



7.7 271(20.45%) Sheltered tenant audits have been undertaken in Q1 of 2025/26 ***NB this excludes routine scheduled visits to sheltered tenants.**

8. Sheltered Housing and Estate Management: New Tenant Visits

8.1 Infographic; % of new tenant visits completed in target



8.2 The target for new tenant visits is for each new tenant to be visited within 10 weeks of tenancy start date.

8.3 This target is set so that any issues the tenant may have can be addressed at an early stage and will enable tenancy sustainment and identify social housing fraud.

8.4 Of the 43% new tenant visits not completed within the 10 weeks of tenancy starting, this equates to 18 tenants not visited. Of the 18, 14 are in general purpose properties and 4 in sheltered accommodation.

8.5 This is a new Performance Indicator that started on the 1st February 2025, therefore we expect to see performance steadily improving as we monitor and address performance in this area.

Where tenants are not successfully visited in the first 10 weeks, we continue to attempt visits after this period. In November, an Access Policy for Housing will be forthcoming to the Housing Review Board, part of which will cover the recommended actions we take where access is denied for visits such as these.

9. Tenant Satisfaction Measures (TSMs)

9.1 Surveying for the TSMs did not start until part way through Q1 due to the procurement and sign-off processes across the consortium. TSM data from acuity will be available from Q2 onwards.

Report to: Housing Review Board

Date of Meeting 30th July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release NA



Housing Performance Report – Property & Assets – Q1 2025/26

Report summary:

The following report outlines the Property & Assets element of the Housing Service's performance through quarter 1 of FY 2025/26. The report covers the Repairs, Compliance and Planned Works functions within Property & Assets.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

The Housing Review Board receives the report and our performance at end of quarter 1, 2025/26.

Reason for recommendation:

To ensure the Housing Review Board have assurance around service delivery, performance and compliance with our health & safety responsibilities for Property & Assets. To enable the Board to scrutinise and challenge the performance of the housing service.

Officer: Nathan Muggeridge, Corporate Lead for Property & Assets

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact The report is for noting and is not recommending any significant policy changes.

Climate change Low Impact The report is for noting and is not recommending any significant policy changes.

Risk: Low Risk; The report is for noting and is not recommending any significant policy changes. However, it is acknowledged that future reports do need to identify the significant risks being managed by the P&A team.

Links to background information NA

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☒ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Housing Performance Report – Property & Assets – Q1 2025/26

Background / Context

1. This report presents an overview of Property & Assets performance during the first quarter of 2025/26 (e.g. April to June). The performance measures reported here support our governance responsibilities under the Regulator of Social Housing's Consumer Standards, particularly in relation to repairs, compliance and planned works. Regular performance reporting to the Housing Review Board ensures oversight is maintained and enables timely scrutiny and challenge, as expected under the regulatory framework.
2. The data presented in this report is colour coded in a traffic light system. Green means we are meeting or exceeding our targets, amber that we are close to target, and red means we are outside of target.
3. Targets are set annually and are our benchmark for where we would like our performance to be.
4. Top Quartiles are the benchmark figures from Housemark, which tells us whether we are in the top 25% of best performing landlords

Resource Changes

5. A significant proportion of our vacant roles within Housing were in the Property & Assets Team. The recruitment of these roles has been a top priority given the potential impact on service delivery. The recruitment activities over the last quarter include:
 - Heating Compliance Surveyor: Role advertised and interviews ongoing.
 - Maintenance Surveyor: Role advertised and interviews ongoing for 3 positions.
 - Repairs Administrator: 80 applications received, and recruitment completed.
 - Repairs Service Manager, Compliance Manager and Senior Surveyor roles have been evaluated and will be advertised in July and interviews completed in August.
6. An internal review has been completed into how the Property and Asset's team can improve customer satisfaction, increase regulatory compliance with the Consumer Standards and deliver a financial efficiency during 25/26. As a result of this, additional resources approved by ELT include:
 - Additional Maintenance Surveyor resources, including a Junior Maintenance Surveyor. This will enable patch-based working with operational areas aligning with Tenant Management.

- Asset Planner and an additional stock condition surveyor to evolve and maintain an asset plan so customers understand when works will be undertaken. This will be fundamental to enable the reduction in repair expenditure and increase the capital expenditure.
- Additional Planned Works Surveyor and a Mechanical & Electrical Surveyor will both increase the probability of the capital programme being delivered and enable a 'Whole Property' approach to be delivered. This will minimise the medium/long term disruption for tenants.
- Recruitment of a Fire Door Surveyor will enable the surveys to be completed at a lower cost and provide greater control over the remedial works scope.

The recruitment of the additional resource will be completed alongside the recruitment campaign to fill the existing vacant roles. These additional resources will enable the current backlogs in survey and investment needs to be resolved, and then the establishment of the enhancement required to deliver both the financial efficiencies and compliance with the consumer standards.

7. The capitalisation of the resources within Property and Assets that are associated with the delivery of Planned Works projects has enabled these roles to be added while generating a £300k/yr revenue saving.

Repairs

8. The six Repairs Agents typically answer 18,000 calls per year and process a further 6,000 online forms from customers. Figure 1 below shows the monthly call metrics including the number of missed calls and average queue times. Work is ongoing to investigate the average queue times and the missed call numbers. A minute long introduction to each call is likely to be impacting the queue times and spikes in call numbers at the start of the week and the start of the day is likely exceeding the capacity of the team, but this needs to be quantified.

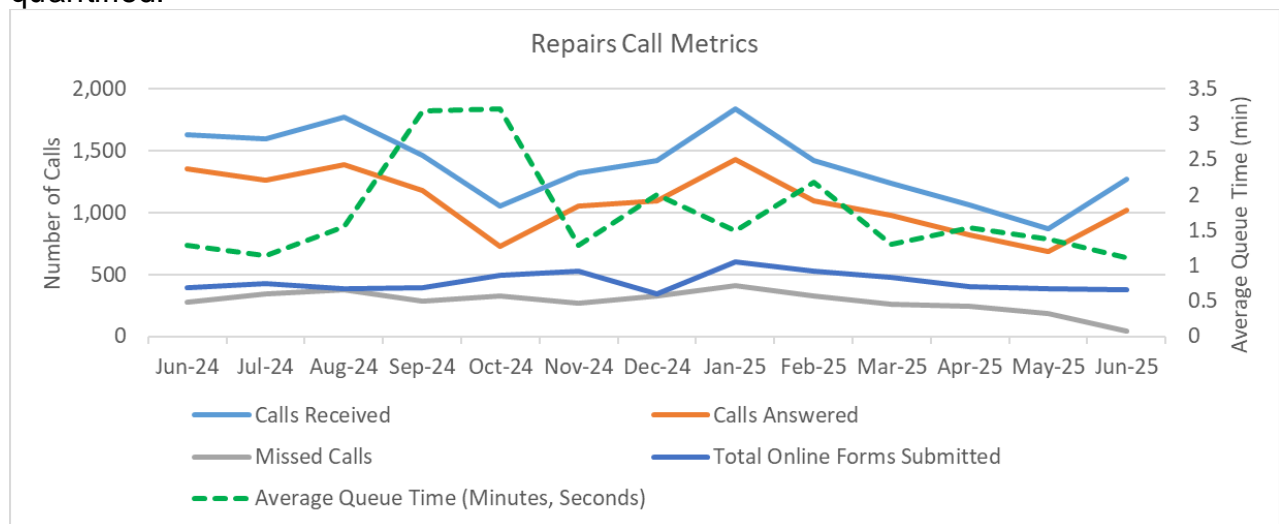


Figure 1. Repairs Call Centre Metrics

9. Figure 2 below shows both the percentage of repairs completed in the target timescales and the total number of repairs completed. The number of repairs jobs does appear to be decreasing based on a comparison of 23/24 vs 24/25 and Q1 24/25 and Q1 25/26. However, the complexity of the repairs needs to be understood before any change in the repairs cost forecast can be made. The reason for the reduction in repairs jobs is unknown. However, the number of emergency repairs did increase by 41% between 23/24 and 24/25.

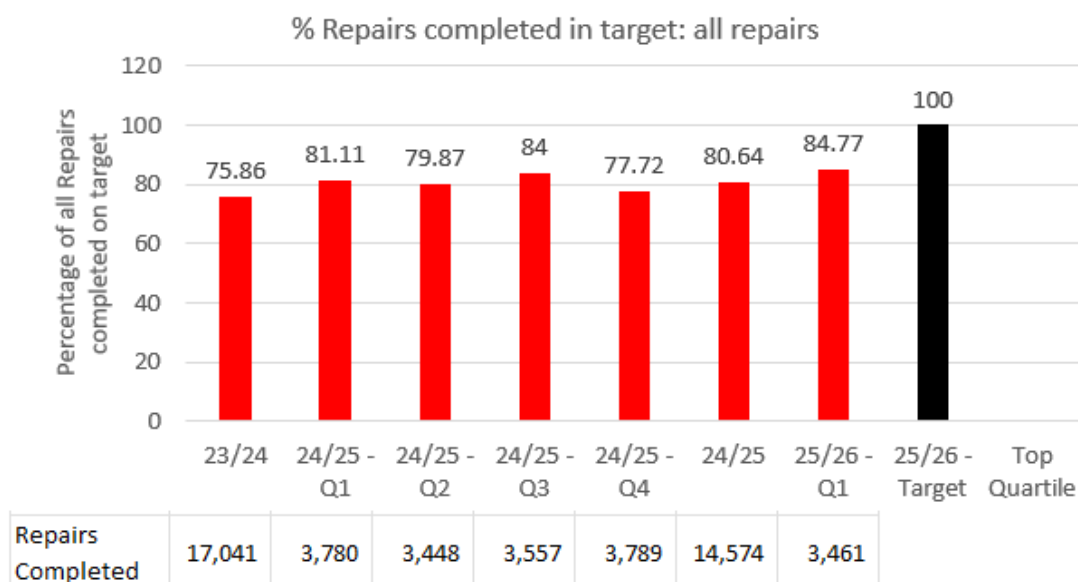


Figure 2. Percentage of repairs completed in target.

10. The percentage of repairs jobs completed in target has increased by **7.05%** in three months between Q4 24/25 and Q1 25/26. This improvement is due to understand the cause of the errors between EDDC and Ian Williams systems, and establishing the mitigation measures to minimise the impact. These mitigation measures include:
- Ian Williams required to obtain approval from EDDC to abandon a repair job and approval is only provided where the customer will have systemised follow-on actions. The investigations of this issue found 2,000 abandoned jobs last year were there was the potential for customers to be left with no follow-on actions to address their repair.
 - Requesting special characters are not used in One Housing order descriptions. The use of these characters appears to prevent the jobs from being transferred from EDDC to Ian Williams.
 - Additional weekly collaborative reporting between EDDC and Ian Williams has started to identify and resolve differences in the two systems. The above resource changes will create the ability to increase the scope of this reporting, particularly with regards the monitoring and tracking of repairs that have not been completed within their timescales.
11. As explained in the proposed Repair Policy, the target response timescales will need to be modified to comply with Awaab's law and this will be supported by further monitoring and reporting.
12. The Maintenance Survey resource within Property and Asset has been under-resourced for some time and this has resulted in a backlog in repair surveys. To both understand the scale of this backlog and ensure the highest priority surveys are being actioned first, a new process has been established to request and track the repairs surveys. All the survey requests are now via this system and since its introduction in early June, 267 surveys have been requested. 48 surveys have been completed or are planned, but this leaves a backlog of 219 surveys. Figure 3 below shows a breakdown of the backlog by survey need. The above resourcing changes will enable this backlog to be resolved by Christmas, ahead of the annual spike in survey request during Q4.

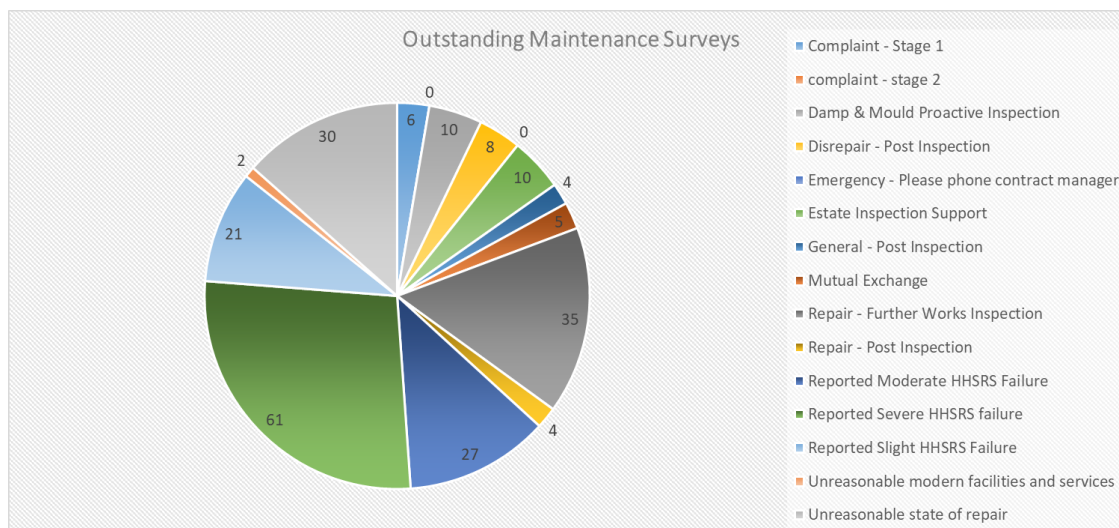


Figure 3. Repair Survey Backlog by survey need.

13. There will be a backlog of repairs and planned works associated with the survey backlog and it is unclear if the current budgets will enable all the required investment needs to be completed. Work will be undertaken in the next quarter to understand the scale of the unfunded investment backlog.
14. One of the consequences of this survey backlog, and not all repairs being completed within the target timescales has been an increase in complaint, disrepair claims and Ombudsman cases. The backlog in complaints has been resolved through a dedicated Surveyor and additional resources to process the claims. However, there are approximately 30 outstanding Disrepair claims and 20 Ombudsman cases. The anecdotal evidence from our Disrepair surveyor suggests 60% of the disrepair case relate to historic workmanship issues. This outcome and the associated legal costs support the need to focus on providing the repair resource to ensure a right first time solution and investing the capital in the Planned Works programme to keep the housing assets decent.
15. The Property and Assets report for the November HRB meeting will include further details on the Damp and Mould Risk, and other HHSRS failures. The Awaab's Law guidance has now been published, and work is ongoing to ensure EDDC complies with the guidance, which will include a review of all the HHSRS failures prior to the November HRB meeting.

VOIDS

16. Figure 4 below shows a continued reduction in the average number of days to relet a property from the VOID process, but the scale of the improvements has slowed. Work has been ongoing with the Scrutiny panel to explore how the VOID process can be improved, and further work is required to achieve an upper quartile position. However, due to the current resource challenges and the increase in disrepair claims, the VOIDS manager is now picking up the delivery of repairs associated with the disrepair process. This is currently limiting the ability to generate further revenue from speeding up the VOIDS process.

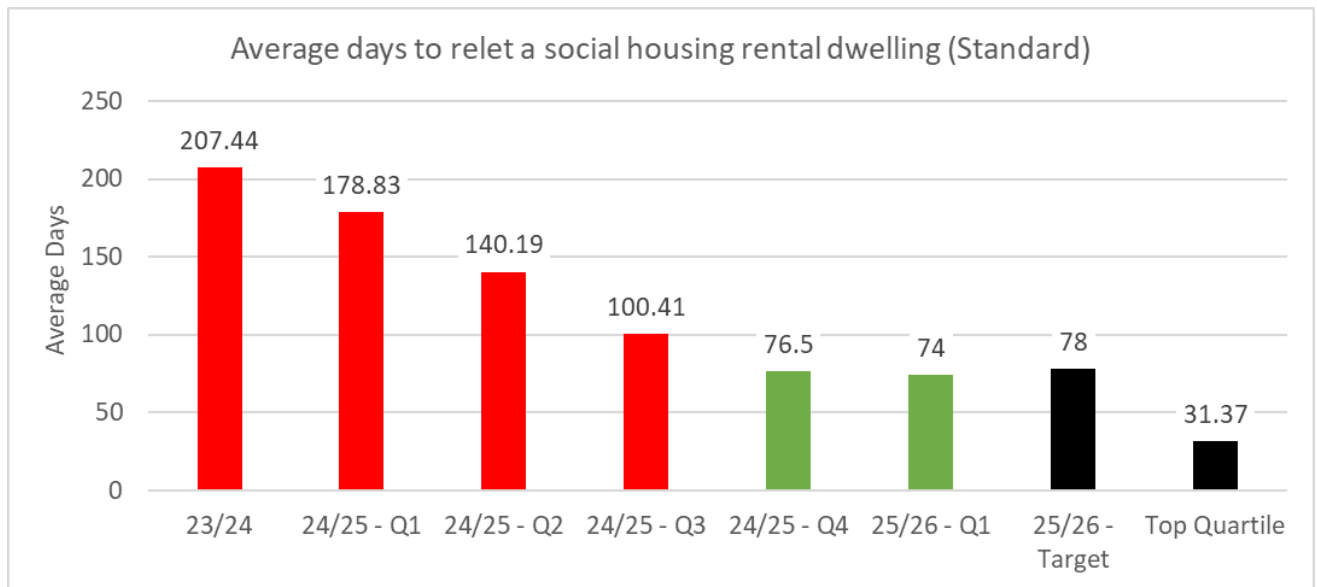


Figure 4. VOIDS performance based on historic average days to relet.

Compliance

The 24/25 TSM compliance submission has been completed at the end of June and

17. Table 1 shows the reported performance.

Table 1. 24/25 TSM Compliance

| Metric | Reported TSM Performance. | |
|--|---------------------------|-------|
| | 23/24 | 24/25 |
| BS01 - Proportion of homes for which all required gas safety checks have been carried out. | 100% | 100% |
| BS02 -Proportion of homes for which all required fire risk assessments have been carried out. | 100% | 100% |
| BS03 - Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out. | 100% | 100% |
| BS04 - Proportion of homes for which all required legionella risk assessments have been carried out. | 100% | 100% |
| BS05 - Proportion of homes for which all required communal passenger lift safety checks have been carried out. | 100% | 47% |

18. A recent review of lifts within our compliance process review has uncovered that the Servicing carried out on each of the passenger lifts in this financial year have not routinely included LOLERs as part of the servicing contract. We uncovered an alternative company had been set up to complete the LOLERs, and that these were in date for three of the six passenger lifts. This has led to us raising urgent orders to complete the remedial actions from the last completed LOLERs on two of the remaining three lifts, with the new LOLER for these two expected to be completed by the end of July 2025 once these remedials are done.
19. The additional lift had already been decommissioned and taken out of service due to the need for a full refurbishment, which is currently going through our planned works process.

The remedial works identified from the compliance tests are summarised in

20. Table 2 below. The ongoing reduction in the number of remedials continues for the FRA, electrical and water compliance areas. At the same time, there is the potential for new

remedials to be identified as part of the ongoing testing. Plans are being prepared for the resolution of the remedial that have been identified more than 3 months ago.

Table 2. Summary of the historic compliance remedial works.

| Remedial Work Category | Duration since identification | Number of remedials | | | |
|---------------------------------|-------------------------------|---------------------|-------------|------------|----------|
| | | August 24 | November 24 | January 25 | April 25 |
| Overdue electrical remedials | (< 3 month) | 24 | 6 | 2 | 1 |
| | (≥3 months) | 893 | 555 | 468 | 366 |
| Overdue FRA remedial actions | (<3 months) | 42 | 1 | 201 | 0 |
| | (≥3 months) | 405 | 703 | 323 | 310 |
| Overdue water safety remedial | (< 3 months) | 2 | 0 | 0 | 0 |
| | (≥3 months) | NA | 306 | 306 | 250 |
| Overdue asbestos re-inspections | (< 3 months) | 0 | 0 | 0 | 0 |
| | (≥3 months) | 10 | 92 | 3 | 0 |
| Overdue lift remedial actions | (<3 months) | 0 | 0 | 0 | 3 |
| | (≥3 months) | 0 | 0 | 0 | 7 |

Planned Works

21. The Planned Works Team have over 30 live projects at varying stages which can be summarised as follows:

- Awaiting approval or approval preparation: **12** schemes or contracts.
- Awaiting Design: **4** schemes
- Design: **4** projects in the design
- Tendering: **3** schemes currently being tendered.
- Contract awards: **3** schemes ready to start on site.
- Onsite projects: **3** schemes and multiple adaptations
- Completed projects: **6** schemes in the defects period.

22. The establishment of a new Planned Works referral process has led to **34** investment needs being submitted. A Planned Works Referral is the identification of any investment need that should be delivered through the Planned Works programme due to the scale (e.g. value of works is >£20k) or type of works (e.g. kitchen, bathroom or roof replacements). It is anticipated the value of works delivered via this work will increase moving forward and it will ultimately reduce the repair volumes.

23. **Case Study:** Flats 1 to 16 Peazen Flats, Beer consists of 4 blocks of 4 two-bedroom flats. The age of the assets, combined with the historic lack of investment has resulted in multiple complaints and disrepair claims. Following a referral to the Planned Works team, a £0.5m scheme has been developed to address the multiple needs including drainage issues, damp & mould, trip hazards, failing render and the general poor state of repair. A tenant engagement event took place on 14th July to explain the works to tenants and obtain their feedback prior to the works being tendered. The event has received extremely positive feedback from tenants. The outcome of this approach will see the investment needs addressed efficiently and through a single scheme, significantly reducing the reactive operational cost and provide tenants with a safe, secure and decent homes.

24. The stock condition survey data has now been provided to EDDC Housing Systems so it can be incorporated within One Housing. The renewals completed since the stock survey was undertaken will also be incorporated within One Housing. A new programme of stock condition surveys will then commence to inspect the properties that could not be accessed

and re-survey other high-risk properties. This new survey data and reporting capability will allow the Planned Works team to start reporting the Decent Homes metric monthly and establish plans to minimise the number of non-decent properties.

Performance Framework

25. The introduction of the Social Housing (Regulations) Act 2023 provided the Regulator of Social Housing (RSH) with the powers to monitor and inspect landlords against the Consumer Standard. This has led to the introduction of the Tenant Satisfaction Measures (TSMs) from April 23 where a suite of KPI's is submitted annually by each Social Housing Provider.
26. To enable EDDC to provide consistent reporting metrics to the Regulator and ultimately build the trust in EDDC's capability to keep its tenants safe and healthy, ELT have approved the application of a Performance Framework with Property & Assets. The Performance Framework will describe the process to collect, organise, and present data in a consistent and meaningful way. It consists of four elements: Role & Responsibilities, Reporting Formats, Reporting Systems and Reporting Metrics. The framework will allow the development of additional 'Leading' metrics to help inform the actions that continue to see improvements in the overall tenant satisfaction.
27. It is anticipated the framework will take 3 to 4 months to be fully implemented and both ELT and HRB will be provided with regular updates on progress.

Risks

28. The P&A performance report to HRB in November 2025 will include a section on Risk that are being managed by the team. Further work is required to fully identify the risk, assess their impact and establish the mitigation measures.

Financial implications:

SD- The report is not requesting any additional funding but highlights significant works being undertaken and details to be considered over stock condition work and further surveys. This will need to be factored into future budgets.

Legal implications:

This report updates the Board on key changes being made in the housing service to ensure that performance continues to improve and that we are legally compliant in the management of our housing stock. MW



Report to: Housing Review Board

Date of Meeting 31st July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release NA

Stock Condition Survey Summary Report

Report summary:

This report presents the findings of the comprehensive Stock Condition Survey undertaken by Currie & Brown on behalf of East Devon District Council (EDDC).

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Housing Review Board recommend to Cabinet that;

1. The results of the stock condition survey are noted.

Reason for recommendation:

To note the outcome of the Stock Condition Survey

Officer: Liam Reading – Assistant Director of Programmes, Investment & Development

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk; Challenges and risk are outlined in points 24 to 26 of this report.

Links to background information .

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☒ Carbon neutrality and ecological recovery
 - ☐ Resilient economy that supports local business
 - ☒ Financially secure and improving quality of services
-

East Devon District Council – Stock Condition Survey Summary Report

Executive Summary

This report presents the findings of the comprehensive Stock Condition Survey undertaken by Currie & Brown on behalf of East Devon District Council (EDDC). The programme surveyed 3,554 residential properties and assessed an additional 588 properties on a desktop basis. In total, 4,522 assets were surveyed, including community centres and garages etc. The purpose of the survey was to support strategic asset management, guide future investment planning, ensure continued compliance with the Decent Homes Standard and identify any health and safety risks under the Housing Health & Safety Rating System (HHSRS). The key outcomes were;

Decent Homes Compliance:

- A high 93.44% pass rate achieved across the individual properties surveyed compared to a national average of 89%
- A low 6.56% of individual properties failed, primarily due to issues of thermal comfort (e.g. inadequate heating or insulation).

Damp Issues:

- 370 instances of major or medium dampness were identified, equating to 10.43% of the stock
- The main causes of damp, including condensation, were due to poor ventilation, penetrating damp from aging windows and seals and damp in bathrooms.

Housing Health & Safety Rating System

- The survey identified 45 Cat 1 Hazards or 1.27% of the stock. This is considered to be a very low number when compared to the national average of 5.1% of properties having category 1 hazards.

Community Centres:

- 15 centres surveyed, many requiring moderate to priority maintenance.
- EPC ratings range from C to E, with multiple opportunities for low-cost energy efficiency improvements.

Sewage Treatment Plants:

- 10 sites were identified as requiring priority replacement or repair due to failure or environmental risk.

Catch-Up Repairs:

The survey identified £5.2 million in catch up repairs, with the highest costs associated with kitchens, bathrooms, heating systems, and windows. A number of these repairs, improvements and replacement have now been completed.

30-Year Investment Forecast:

A key outcome of the survey work was an estimation of the investment needs of the stock to inform the business plan and guide future investment decisions. The headline findings were;

- £267 million required across the surveyed stock.
- £311 million projected cost when accounting for the full asset base.
- Highest forecast costs relate to boilers, external walls, landscaping, and roof coverings.

Conclusion

The stock condition survey results demonstrate that East Devon District Council's housing stock is largely compliant and fundamentally sound, but requires long-term strategic investment. This investment, which will be set out in a 30 year Business Plan, will need to be targeted and sustained to avoid asset degradation and future compliance failures which impact tenant wellbeing, service delivery and long-term sustainability.

Stock Condition Survey - Summary Report

Introduction

1. The survey was commissioned to inform strategic asset planning, assess future investment needs and ensure compliance with regulatory standards across EDDC's housing portfolio.

Survey Scope

2. The following outlines the scope of the survey.

- 4522 Assets surveyed out of a total of 5202 assets (87% coverage)
 - 3554 Individual properties physically surveyed out of 4142 (86% Coverage)
 - 588 Remaining individual properties assessed on a desk top basis:
3. Surveys incorporated both physical inspections and energy audits, ensuring a robust data set for future planning.

N.B: – Figures calculated based on 4142 properties. Stock figures change over time reflecting Right to Buy Sales and Acquisitions and may be marginally different as at today's date.

Condition Summary

Decent Homes Standard Compliance

4. The Decent Homes Standard is a framework set by the UK government in 2000 to ensure that all social housing meets certain baseline living conditions.
5. The survey identified a very positive pass rate of 93.44%. This level of decency is significantly above the national average of c.89%.
6. The primary reason for failure was thermal comfort (excess cold). Other failure areas included inadequate kitchen and bathroom standards and substandard heating or insulation systems.
7. A number of blocks of flats with external and communal elements were originally recorded as having failed. However, where a decent homes failure in a block has occurred, this has been attributed to individual flats, to avoid double counting and showing a higher failure rate.

Damp and Condensation

8. Major or Medium levels of damp were reported in 10.43 % of properties or 370 individual homes. This compares to a national average of 7.0 % indicating a slightly higher incidence of damp.
9. The classification of Dampness into Major and Medium follows Ministry of Housing, Communities and Local Government (MHCLG) guidance. The incidence of major damp was reported in 1.8% of properties, with Medium Damp being present in 8.63%. The key causes being;
 - Poor ventilation (leading to condensation)
 - Penetrating damp from aging windows
 - Damp in bathrooms
10. Addressing damp is critical for tenant wellbeing and long-term housing quality. Resolving damp issues is therefore a key priority, as outlined in the 2025/26 HRA Budget priorities,

and factored into current planned expenditure and maintenance programmes. As highlighted, any damp issues falling into HHSRS Cat 1 hazards were addressed immediately once the issues were identified.

The Housing Health and Safety Rating System (HHSRS)

11. The Housing Health and Rating System (HHSRS) identifies hazards which are ranked based on the potential risk they pose to health and safety:

▪ **Category 1 Hazards:**

These are the most serious risks to health, such as severe damp, dangerous electrics, or fire hazards. By law, landlords must take immediate action to rectify these issues once identified.

▪ **Category 2 Hazards:**

These represent less severe risks but still require attention. Although a Category 2 hazard does not result in a failure under the Decent Homes Standard, it is best practice to resolve these hazards as soon as practicable to prevent them from escalating into more serious issues or impacting tenants' wellbeing

12. The survey identified 45 Cat 1 Hazards or 1.27% of the stock. This is considered to be a very low number when compared to the national average of 5.1% of properties having category 1 hazards. A total 1,997 of the lower level Cat 2 hazards were identified.

Community Centres and EPC Ratings

13. All 15 community centres were surveyed. Common issues included;

- Blocked gutters
- Poor insulation
- Structural cracking
- Non-compliant or degraded fire doors

14. EPC ratings for community centres range from C to E, with widespread recommendations for LED lighting, cavity wall insulation, modern heating systems and energy efficiency upgrades (e.g. air/ground source heat pumps, PV systems).

Sewage Treatment Plants

15. 10 plants were rated 'Red' and requiring immediate replacement or remediation (e.g. Failed trickle filters, undersized tanks, discharging to watercourses). Several others received Amber ratings, indicating risk of future failure and the need for proactive works. To date, 2 out of the 10 have received the necessary repairs, replacements or upgrades.

Garages

16. The condition survey for the garages was prepared on the basis of a visual non-disruptive inspection of the building fabric. The average cost per garage to refurbish amounts to £1,747. The total cost to refurbish all blocks is £1.23m. An internal interim Garage Asset Management Plan is in place to assess and respond to the issues identified in the survey.

Investment Needs – Summary

Urgent Catch-Up Repairs

17. The survey identified the need for catch up repairs with a total investment requirement of £5.2m. The highest cost areas were;

- Kitchens: £2.75m
- Sanitary appliances & extract fans: £1.09m
- Boilers: £339k
- Windows: £185k

30-Year Lifecycle Investment

18. A key outcome of the survey is 'lifecycle data' for key component replacement such as doors, roofs, windows, boilers etc over a 30 year period. This data provides a base position to develop a long term 30 year Business Plan and an effective Asset Management Plan

19. For the properties surveyed, the report estimates an investment requirement of £267 million. The total projected investment required (including un-surveyed properties) amounts to £311 million.

20. The high-cost areas over 30 years were:

- Boilers/Heating Systems: £34.3m
- External Walls: £32.6m
- Landscaping: £20.5m
- Kitchens: £17.1m
- Roof Coverings: £9.2m

Survey Conclusions and Recommendations

21. The survey report recommended significant investment across both short-term repairs and long-term improvement and upgrades. Priority areas are:

- Heating and thermal efficiency improvements
- Kitchen and bathroom replacements
- Damp and mould remediation
- Ensuring compliance with the Decent Homes Standard
- Incorporating energy-efficient upgrades to reduce carbon emissions, enhancing tenant comfort, and managing fuel poverty.

Strengths Identified

22. The majority of the housing stock is in generally good or satisfactory condition, with a strong baseline for long-term management and with a high Decent Homes pass rate and a low level of Cat 1 hazards compared to the national average.

23. Many identified improvement measures, particularly around energy efficiency, offer high return on investment and align with sustainability goals.

Challenges and Risks

24. Substantial short and long-term capital investment is required to maintain asset quality and tenant satisfaction.

25. High initial investment pressure have been identified within the first 15 years, particularly for heating, external fabric, and roofing systems.

26. Key risks include non-compliance with thermal comfort standards and damp-related health issues.

Responding to the Survey

27. As Members will be aware, the survey commenced in quarter 4 of 2022. Since this time a significant investment has been made into the stock with many of the repairs identified above having been completed. Where such repairs have been undertaken, these will be updated on our Housing System enabling an up-to-date record of stock condition.

Urgent Works – Short Term

28. On receipt of emerging data, officers were able to identify and respond to any high level priority risks such as Category 1 Hazards. All properties where Cat 1 hazards were identified during the survey have had remedial work commenced.

29. In addition to Cat 1 hazards, urgent upgrades to Sewage Treatment Plants were also identified. Again, these were prioritised for remedial works with 2 of the 10 Sewage Treatment Plants identified having undergone major improvement or replacement. Further

improvements and replacement will be undertaken as part of an ongoing planned programme.

Priority Works – Medium term

30. The survey work identified a number of HHSRS Category 2 hazards, which whilst not legally required, should be completed by a responsible landlord. Our investment plans over the medium term i.e. 1 – 5 years will respond to both the identified category 2 hazards and the 7% of homes that fail the decent homes standard.

Investment, Cyclical Maintenance & Component Replacement - Long Term

31. The level investment required in the housing stock presents a substantial financial challenge requiring effective long term business planning and proactive asset management. Our long term approach will be set out in a 30 year business plan later in 2025/26, alongside an Asset Management Plan to ensure the effective management of our assets, including tackling high cost, non performing, assets.

Conclusion

32. The stock condition survey results demonstrate that East Devon District Council's housing stock is largely compliant, fundamentally sound, but requiring strategic long-term investment. This investment will need to be targeted and sustained to avoid asset degradation and future compliance failures which impact tenant wellbeing, service delivery and long-term sustainability.
33. Having formally concluded the stock condition work, the Council has a clear view of where to act, a solid data foundation for decision-making and long term business planning and effective asset management moving forward.

Financial implications:

These details will now be assessed as part of the 30 year business plan for the HRA

Legal implications:

There are no substantive legal issues to be added to this report

Report to: Housing Review Board



Date of Meeting 30th July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release NA

Housing Revenue Account Business Plan - Update Report

Report summary:

This report provides an update on the Housing Revenue Account (HRA) Business Plan and associated strategic documents that underpin the effective management and investment in East Devon District Council's housing stock to ensure the housing service remains financially viable, sustainable, and responsive to tenant needs.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Housing Review Board Recommend to Cabinet that;

1: The HRA Business Plan position, and required efficiency savings, be noted

Reason for recommendation:

To enable the development of a long-term sustainable Business Plan to ensure sufficient investment in the housing stock

Officer: Liam Reading: Assistant Director – Programmes, Investment & Development

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational
- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Medium Impact

Risk: Medium Risk; Long term business planning includes inherent risk which is mitigated through constant review

Links to background information .

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Housing Revenue Account Business Plan - Update Report

Background / Context

1. The HRA continues to face significant financial pressure in the immediate and longer term. These pressures arise from a range of factors including an historic underinvestment, increased consumer and regulatory standards, general inflation, restricted rent increases, net zero expectations, disrepair claims, complaint resolution, high void and decant costs and other issues. This situation is not unique to East Devon with similar cost pressures being seen amongst other housing providers and stock holding local authorities.
2. As members will be aware, the 2023/24 HRA budget outturn and capital spend far exceeded the planned budget. This necessitated the contribution of all HRA earmarked revenue reserves and required £2.5m of additional borrowing. Furthermore, the adopted HRA 'balance reserve' was reduced from an adopted minimum of £3.1m to £1.76m.
3. Shortly after the start of the 2024/25 financial year, it was established that the proposed budget would be insufficient to meet the needs and demands of the housing service and provide the investment required to ensure decent and regulatory compliant homes. A revised budget was approved by Council in July 2024.
4. Improved budget management, monitoring and controls meant the 2024/25 Budget outturn was within budget at year end. This represents a significant improvement on the previous year and reflects significant improvements in financial planning and management of the HRA.

Business Plan Overview

5. The previous HRA Business Plan has expired and requires updating to reflect current circumstances and the future investment needs of the stock. The purpose of a Business Plan is to ensure long term financial sustainability over a 30-year period and ensure sufficient resources are available for the management, maintenance, repair and improvement of the stock. Business plans should also consider maintaining stock levels through acquisitions, development and estate regeneration.

6. The HRA Business Plan will provide the overall financial framework for the HRA. Operational management and delivery details are set out in accompanying documents such as the Asset Management Plan and Housing Investment and Delivery Plan etc.

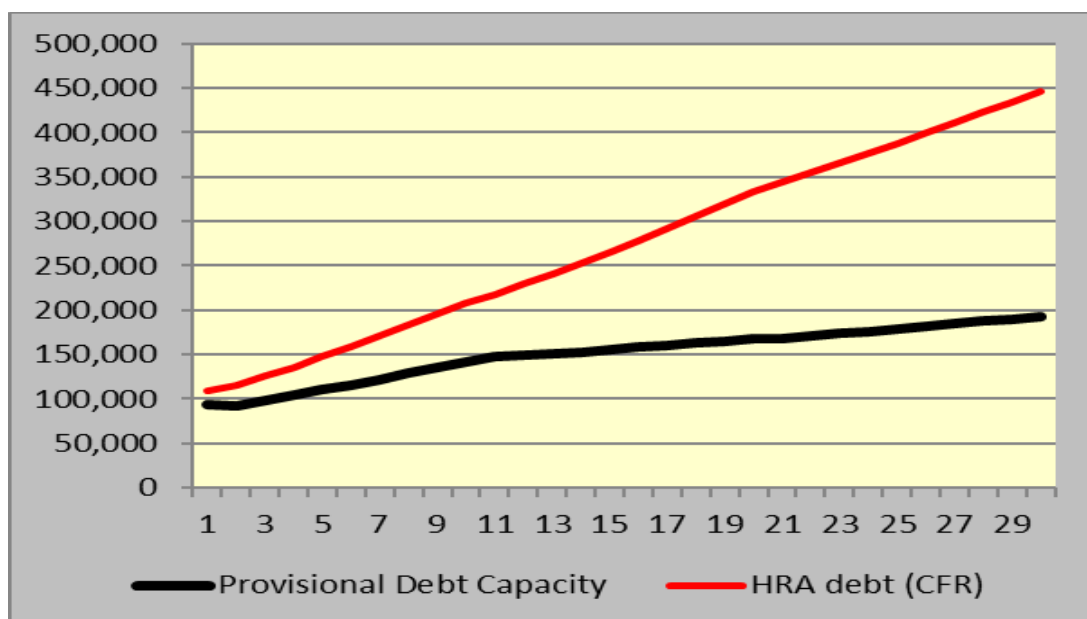
Business Plan & Stock Options Review

7. The Council commissioned Savills to undertake a Business Plan Review and develop a bespoke financial Model for East Devons HRA stock. The key components of the model include;
 - **Income Forecasts:**
Primarily from tenant rents and service charges, including projections based on rent policies and potential rent increases.
 - **Expenditure Forecasts – Revenue**
Routine maintenance and repairs, housing management and staffing costs.
 - **Capital Programme:**
Investment plans for maintaining existing stock and building new homes. This includes investment in major improvements such as roofs, kitchens, bathrooms etc and other compliance elements.
 - **Debt Management:**
How loans for capital investment will be repaid over time. Includes interest and principal repayment plans.
 - **Risk Management:**
Assessing uncertainties such as policy changes, inflation, or economic downturns.

Business Plan Modelling: Base Position

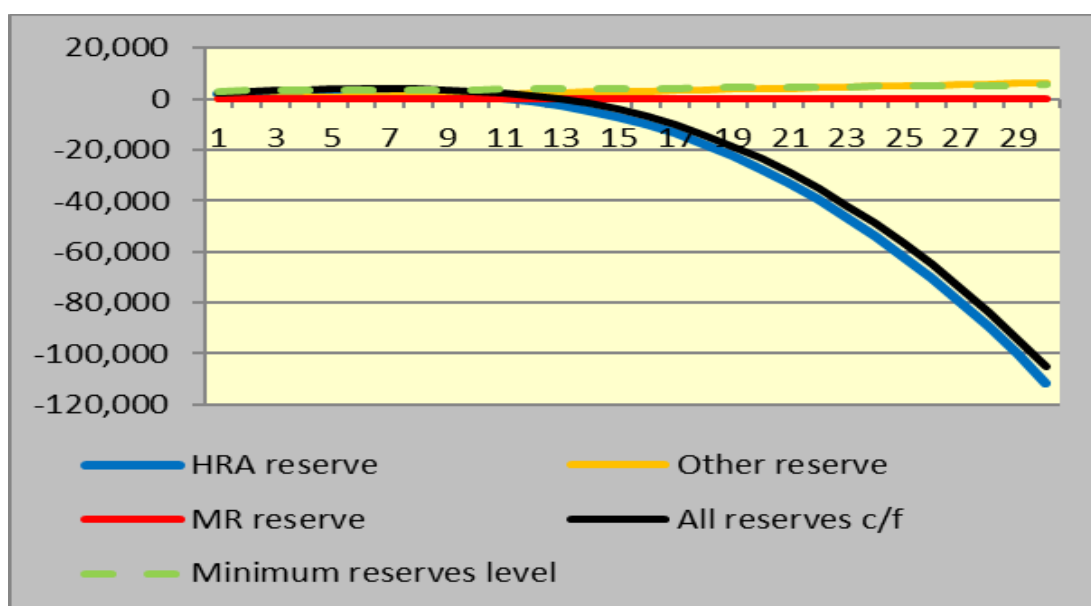
8. The modelling process establishes a base position, reflecting the Council's current financial position and the current approved budget 2025/26. This base position is projected forward, taking account of various factors including the investment requirements of the stock and other assumptions around inflation, borrowing cost and annual rent increases etc.
9. The level of investment that has been assumed for business planning purposes has been informed by the stock condition survey. It should be noted that this level of investment is estimated and has been used to guide the process. An indicative level of investment of £67,439 per property or £281m in total has been assumed over 30 years. This aligns with comparable average stock investment levels, as advised by Savills, and is considered to be a reasonable assumption.
10. In simple terms, the base model establishes the viability of delivering the required level of investment in the stock, whilst continuing to operate on the current revenue budget basis. The model shows the **current** HRA base position as being highly unsustainable. The level of borrowing/debt becomes significantly above prudential debt capacity i.e. our revenue would be insufficient to service the debt. This would result in the revenue account reaching a critical point within around 10 years.

11. The graph below illustrates how debt, arising from stock investment, is above capacity (red line), and escalates significantly above capacity (black line), over the 30-year business plan period.



Graph 1 – Debt Projection

12. The graph below shows how income does not support the proposed level debt/borrowing. This would result in the revenue / reserve position turning negative in around 10 years i.e. the HRA would be unable to service the debt.



Graph 2 -Revenue Projection

Business Plan: Achieving a sustainable position.

13. In order to support the required level of borrowing for stock maintenance and investment, the HRA needs to reduce revenue expenditure by 15%, or in cash terms by around £2.6m. Whilst achievable, this scale of reduction is significant and highly challenging. It is therefore essential that an Efficiency Plan is established to achieve a long term sustainable position.
14. The following outlines a broad approach to the required savings and efficiencies. It is considered realistic to phase these efficiencies/reductions over a 5 year period with a 2.5%

reduction in revenue expenditure in each of the next 4 years, followed by a 5% reduction in year 5. Reductions would formally commence in 26/27 and continue through a potential transition to a new authority under Local Government Reorganisation. It is assumed that any new authority may result in a merger of other HRA's, resulting in significant efficiencies.

| Year | Revenue Saving Target % | Notes |
|--------------|-------------------------|--|
| 2025/26 | 0 | Transitional year |
| 2026/27 | 2.5% | Minimum reduction |
| 2027/28 | 2.5% | Minimum Reduction |
| 2028/29 | 2.5% | Minimum Reduction – Possible year 1 of new authority |
| 2029/30 | 2.5% | Minimum Reduction – Possible year 2 of new authority |
| 2030/31 | 5% | Minimum Reduction – Possible year 3 of a new authority |
| Total | 15% | |

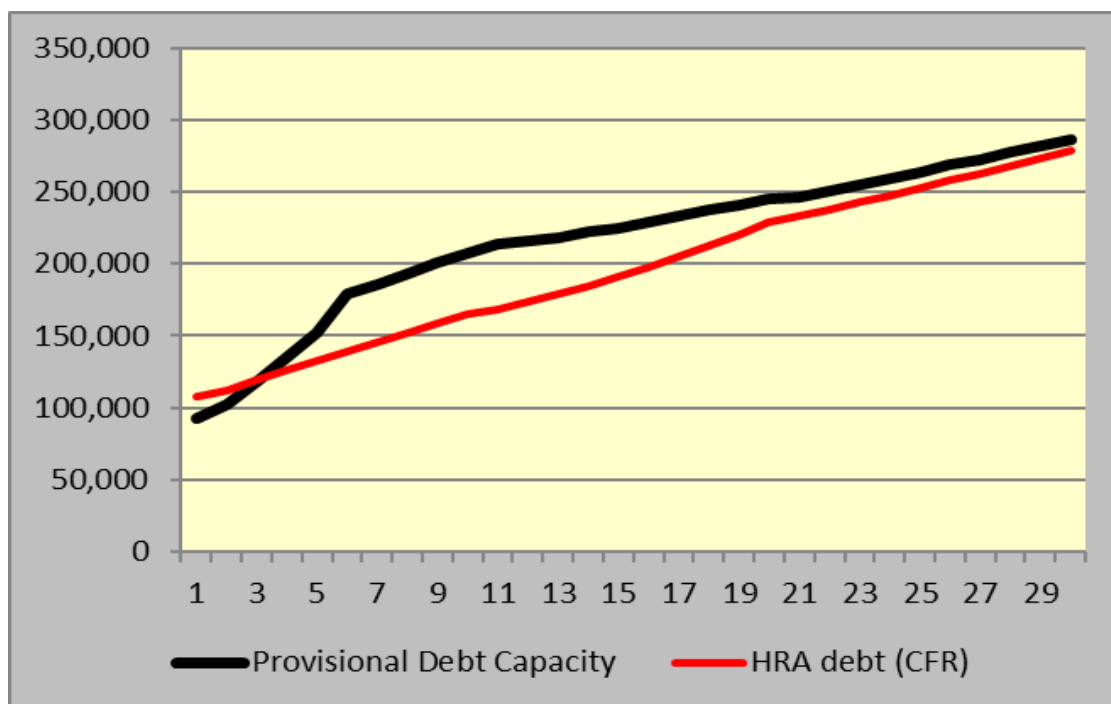
15. The proposed reductions will be split across both Management & Supervision (*M&S – Total current budget £10.25m*) and Repairs & Maintenance (*R&M - Total Current Budget £7.14m*) i.e. the main constituent elements of revenue expenditure. In financial terms the reductions would approximately be as follows.

| Budget | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total |
|------------------|----------|----------|----------|----------|----------|------------|
| Total Reductions | £434,492 | £434,491 | £434,492 | £434,491 | £868,963 | £2,607,000 |

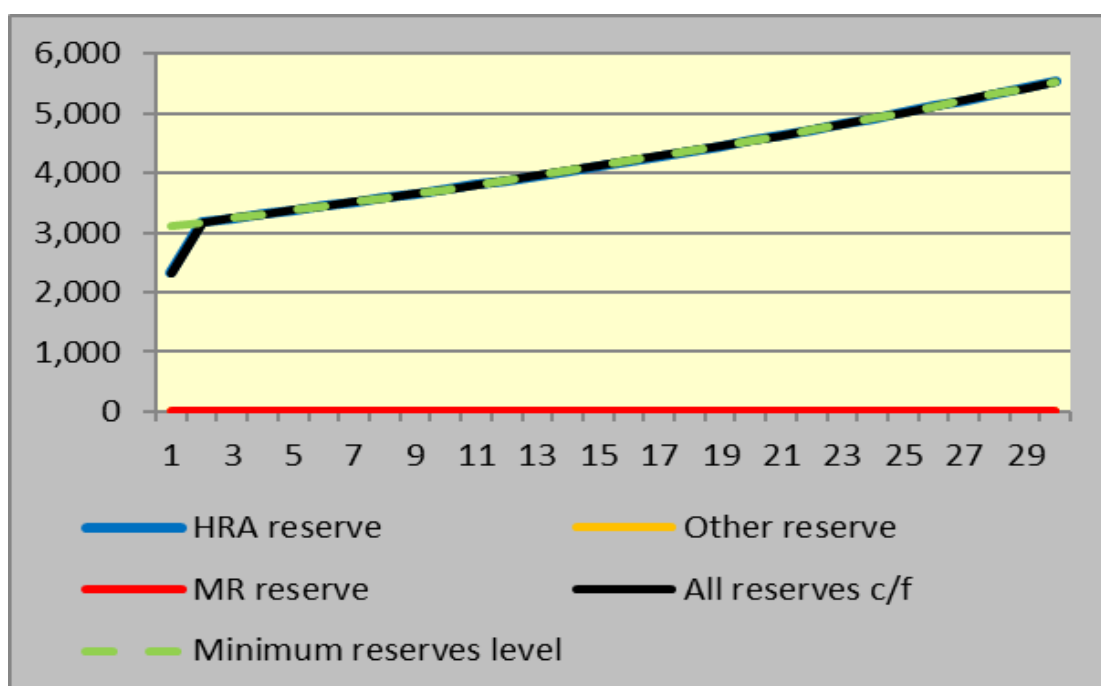
16. If LGR does not proceed as anticipated, the Efficiency Plan will need further review and alternative arrangements developed to ensure the overall 15 % reduction in revenue expenditure is achieved.
17. The balance of reductions between S&M and R&M may change over the life of the Efficiency Plan i.e. greater efficiencies achieved in one would reduce the requirement in the other. Overall however, the target revenue reduction would remain at 15%.

Business Plan – A Sustainable Position

18. Assuming the above efficiencies and reductions are delivered, modelling suggest a sustainable position is achievable within the overall plan period. Debt transitions to within capacity early in the plan period with marginal headroom for a small level of additional borrowing.



Graph 4 above – Debt projection/capacity (2025 – 2055)



Graph 3 above – Revenue Projection (2025 – 2055)

Efficiency Plan – Implications

19. As highlighted, a long-term sustainable position requires a 15% reduction in revenue expenditure. The delivery of these efficiencies and budget reductions are currently being established through an HRA Efficiency Plan. An ongoing internal review has identified a number of opportunities for improved efficiency and cost reductions. This plan will be critical in achieving the required targets and will be kept under constant review.

20. It should be highlighted that it is considered inappropriate to seek redundancies prior to LGR.
21. Any saving or efficiencies will be based upon the principle of finding alternative approaches to service delivery to ensure the quality of tenant services are maintained or improved. This may include the introduction of new technologies, AI integration and working practices that increase efficiency whilst reducing resources / expenditure. Work to date has established significant opportunities in this respect.
22. Other elements of the Efficiency Plan include income maximisation and effective asset management to boost income and tackle poor asset performance.
23. A failure to deliver the required savings will place the long-term sustainability of the HRA at risk. There are limited options for an HRA facing financial issues. In this scenario the following may need to be considered.
 - **Rent flexibility**
Seeking regulatory/government approval to increase rents above CPI + 1
 - **Asset disposals**
Disposing of an increased number of assets to reduce debt
 - **Reduced investment**
Reducing investment in the stock to a minimum only standard
 - **Government financial support**
Not currently available but potentially available in the future
 - **Alternative Management model.**
Outsourcing management to achieve efficiencies

Development & Regeneration Aspirations

24. Maintaining stock levels and responding to the needs of our communities and regenerating our estates are key consideration and a priority for the future of the HRA. The Business Plan model incorporates an ability to include our development and estate regeneration aspirations. Modelling suggests that development activity makes a positive contribution to the revenue position, assuming a certain level of Homes England grant and other sources of capital funding.
25. Our development and regeneration aspirations are set out in a separate report but in summary, have the potential to deliver up to 500 new homes. These ambitions are outlined in the Housing Investment and Delivery Plan (The Build & Buy Plan).

Asset Management

26. Effective Asset Management is critical in achieving long term sustainability for the HRA. The Asset Management Plan, which is under development, will provide a clear strategy to target poor asset performance allowing investment to be targeted effectively. Poor performing assets, which are detrimental to the overall financial health and sustainability of the HRA, will be tackled and potentially disposed of. The Asset Management Plan will be presented to HRB in due course. In the meantime, the principles of effective asset management are embedded in our current approach.

Risk Management & Monitoring

27. It is important to highlight that the Business Plan modelling is a snapshot of our current position and forecast over the long term. Within these forecasts are numerous assumptions around income and costs etc. These include rent increases, inflation, interest rates, RTB sales and many other assumptions. Whilst the forecast and assumptions are based on the best available data and advice, these assumptions may change. This presents an inherent and unavoidable risk. For example, if any of the assumptions change, either positively or negatively, these could have a significant impact on the long-term plan. For that reason, the Business Plan will be kept under constant review, with key assumptions updated to reflect any changes and risk monitored and reported..

Tenant Engagement

28. The interest of our tenants is at the heart of our approach. Our long-term plans for investment in the stock and the provision high quality homes and excellent customer service is highly important. As such we are committed to engaging and communication our plans. We will present our stock investment and longer-term strategic plans to members of our Tenant Scrutiny Panel during the coming summer.

Next Steps.

29. A formal Business Plan will be published later in the current financial year with formal adoption to align with the 2026/27 budget. The plan will set the financial framework for budget setting and capital investment over the medium term.
30. The Asset Management Strategy will be completed and presented to prior to the commencement of the 2026/27 financial year.
31. The Build and Buy Plan, A 5 Year Investment and Development Strategy is presented in a separate report. The financing of the plan will be subject to formal Council approval of the HRA Business Plan.

Financial implications:

The above report lays out the financial position. The affordability of stock investment and the financial sustainability of the Housing Revenue Account (HRA) relies on the delivery of annual cumulative savings of £434k each year for the next 4 years and then the sum increases based on efficiencies that should be obtained through LGR. This will need to be carefully monitored, along with the costs and income projections in the model to ensure the viability of the HRA.

Legal implications:

This is an important report that appraises members of the financial position as far as the Housing Revenue account is concerned.

Housing Revenue Account (HRA) Business Plan –Q&A

1. Financial Sustainability and Pressures

Q: What are the main financial pressures currently facing the HRA?

A: The HRA is under significant pressure due to historical underinvestment, increased regulatory

standards, inflation, limited rent increases, net zero expectations, disrepair claims, void costs, and more. These are not unique to East Devon but are being felt nationally across housing authorities.

Q: Why was additional borrowing required in 2023/24?

A: Due to budget overspend, the council needed to use all earmarked HRA reserves and borrow an additional £2.5 million. The HRA balance reserve was also reduced to £1.76 million from a recommended £3.1 million.

Q: Is the current HRA Business Plan financially sustainable?

A: No. The base model indicates the current plan is highly unsustainable, with debt projected to exceed prudential borrowing limits within 10 years if no action is taken.

2. Efficiency Plan and Budget Reductions

Q: What is the proposed solution to restore sustainability?

A: A 15% reduction in revenue expenditure (approx. £2.6m) is required. This will be phased over five years starting in 2026/27, with annual reductions of 2.5% for four years, and 5% in the fifth.

Q: Where will these savings come from?

A: Reductions will be split between Management & Supervision (M&S) and Repairs & Maintenance (R&M), with £1.54m targeted from M&S and £1.07m from R&M over the five-year period.

Q: How will this affect staffing?

A: No redundancies are planned before Local Government Reorganisation (LGR). However, staff reductions will occur through natural wastage and a recruitment freeze on non-essential roles.

Q: What if the 15% savings target is not achieved?

A: This would risk the HRA's long-term viability. Alternatives like rent flexibility, asset disposals, reduced investment, government support, or outsourcing may need to be considered.

3. Stock Investment and Development

Q: How much investment is needed for the current housing stock?

A: Approximately £281 million over 30 years (£67,439 per property) has been assumed for modelling purposes based on stock condition surveys and benchmarking by Savills.

Q: Will development and regeneration help the financial position?

A: Possibly. Development activity, assuming grant support, is projected to potentially improve the HRA's revenue position and help maintain housing stock levels.

Q: What are the development goals?

A: The Housing Investment and Delivery Plan aims to deliver up to 500 new homes. This supports both housing needs and financial resilience.

4. Stock Transfer (LSVT) Considerations

Q: Is a Large Scale Voluntary Stock Transfer (LSVT) being considered?

A: Savills conducted a theoretical appraisal, but the current stock valuation is negative £74 million, with an £87 million debt write-off needed. The resulting valuation of -£161 million makes LSVT financially unviable at this time.

5. Risk Management

Q: What are the key risks to the Business Plan?

A: Risks include assumptions about rent increases, inflation, interest rates, and RTB sales. Any changes in these could significantly affect the plan.

Q: How will risks be monitored?

A: The plan will be under continuous review. Adjustments to assumptions and financial modelling will be made as new data becomes available with risks monitored and reported..

6. Tenant Engagement and Service Quality

Q: How will tenant interests be safeguarded during cost-cutting?

A: All savings will be guided by the principle of maintaining or improving tenant service quality. This includes exploring new technologies, AI, and alternative delivery models.

Q: What engagement is planned with tenants?

A: The council will consult and communicate the investment and strategic plans with tenant panels during the summer and continue engagement through established channels.

7. Next Steps

Q: When will the full updated Business Plan be adopted?

A: The formal HRA Business Plan will be published and adopted, subject to Council approval, to align with the 2026/27 budget.

Q: What other strategic documents are forthcoming?

A: The Asset Management Strategy and the Build & Buy Plan (5-Year Investment Strategy) are key accompanying documents and will be submitted separately.

Report to: Housing Review Board

Date of Meeting 30th July 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Build & Buy - A Housing Investment & Delivery Plan for East Devon

Report summary:

The report is a response to a growing housing need and feedback from the Housing Strategy consultation. The report provides an overview and introduction to 'Build and Buy' A Housing Investment & Delivery Plan for East Devon.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☐ No ☐

Recommendation:

That Housing Review Board recommend to cabinet that;

- 1) The Build & Buy Plan is endorsed by the Council
- 2) It be noted that the financing of the plan is subject to the approval of the HRA Business Plan and the 2026/27 budget setting process in due course.

Reason for recommendation:

To increase the supply of affordable homes for residents of east Devon and contribute to wider housing and community objectives, including estate regeneration.

Officer: Tom Butcher – Development Surveyor; Liam Reading – Assistant Director Programmes, Investment & Development

Portfolio(s) (check which apply):

- ☐ Assets and Economy
- ☐ Communications and Democracy
- ☐ Council, Corporate and External Engagement
- ☐ Culture, Leisure, Sport and Tourism
- ☐ Environment - Nature and Climate
- ☐ Environment - Operational

- ☐ Finance
- ☐ Place, Infrastructure and Strategic Planning
- ☒ Sustainable Homes and Communities

Equalities impact Low

Climate change Medium Impact

Risk: Medium Risk; Risk table is included on page 4 of this report, and financial implications from point 13 onwards.

Links to background information None

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Build & Buy: A Housing Investment & Development Plan for East Devon

Introduction

1. This report outlines the Council's vision for new housing through '***Build and Buy – A Housing Investment & Delivery Plan for East Devon.***
2. The purpose of the plan is to maximise the use of our assets, address housing need and support the Council's strategic objective of having a supported and engaged community that have the right homes in the right places and with the appropriate infrastructure.
3. The Plan aims to deliver **500 new homes over the next five years**, with an equal split between homes developed on Council owned land and homes acquired through partnerships with private developers.
 - **250 homes** will be delivered through direct development on the Council's existing landholdings.
 - **250 homes** will be purchased from developers as part of Section 106 agreements, joint ventures, or off-the-shelf acquisitions.
4. This mixed delivery approach is intended to accelerate housing supply, make efficient use of public assets, and ensure the Housing Revenue Account (HRA) has a range of housing stock to meet local needs.

Key Considerations

Site and Development Feasibility

5. Council owned land will be subject to detailed design proposals and local engagement prior to the submission of Planning. Consideration of local need, house types, location and local infrastructure will be included.
6. Delivery of homes will be phased to manage risk and delivery over the 5 year period.

Construction Type, Procurement and Delivery Models

7. The form of construction may vary depending on site specific requirements, but could include traditional build or Modern Methods of Construction (MMC)
8. Procurement and delivery is likely to be a mix of design & build contracts, partnerships with housing associations and developer-led schemes. The use of Framework Agreements where appropriate will streamline procurement and ensure value for money.

Housing Mix and Design Standards

9. The plan proposes to deliver a range of 2, 3 and 4 Bedroom, general needs homes, to create a range of house types
10. Where possible, housing standards for internal elements such as kitchens, bathrooms, heating etc across developments and acquisitions will be standardised to aid long term management and maintenance efficiency.

Community and Stakeholder Engagement

11. Residents, local councillors, and partner organisations will be engaged throughout the planning and delivery stages to ensure communities are informed and involved. Detailed engagement plans will be prepared on a scheme by scheme basis.
12. This Plan is based on a clearly identified housing need and responds to the challenges outlined in the Councils Draft Housing Strategy. Responses to our consultation on the Housing Strategy showed that the availability of affordable homes for local people was a clear priority.

Risk Assessment

| Risk Category | Description | Mitigation Measures |
|----------------|--|--|
| Planning | Potential delays or refusals at planning stage | Early pre-application engagement with planning officers |
| Cost Inflation | Fluctuations in construction costs or house prices | Build in contingencies and phased procurement to adjust to market conditions |

| | | |
|--------------------------|---|--|
| Delivery Delays | Construction or supply chain delays | Use of established contractors; realistic programming and risk-sharing |
| Financial Risk | Cost overruns or underperformance of acquisitions | Robust financial modelling, cost controls, and regular reviews |
| Reputational Risk | Public opposition or perceived lack of transparency | Clear communication strategy and ongoing engagement with communities |

Financial Implications:

Capital Investment

13. A significant financial investment will be required to realise the plan vision. This is estimated to be up to £100million over 5 years. The aspiration will be for all new homes to be self-financing i.e. with income covering the cost of borrowing and without negatively impact the Housing Revenue Account.
14. Site by site financial viability will be undertaken to determine the affordability of any proposed development or acquisition. However, there will be a need for further sources of funding to cross subsidise as detailed below.
15. The funding requirement of the plan will form part of a new HRA Business Plan which will be brought to Members for approval in due course and will align with the budget setting process for 2026/27.

Funding Sources

16. The Build and Buy Plan will require a significant capital investment by the Council. This will be met from a range of sources including;
 - Prudential Borrowing
 - Capital receipts from land & assets
 - Government grants (e.g Homes England)
 - S106 commuted sum
 - Right to Buy Receipts

Revenue Implications

17. New homes will generate rental income that will be used to service prudential borrowing. As indicated above, the intention will be for all projects to be self-financing. Where necessary for financial viability, alternative tenures such as shared ownership or market housing may be considered, but only if they enable the wider delivery of affordable housing.

Governance

18. Strong governance is essential to ensure the effective delivery of the Housing Investment and Delivery Plan and to maintain transparency, accountability, and oversight. Effective governance will be achieved through the following;

Communications and Engagement Strategy:

19. Development projects will include detailed communication and engagement strategies, appropriate to the location and scale of development. The intention will be to provide a clear overview for when and how actions will be undertaken and to manage expectations.

Regular Portfolio Holder Updates

20. Regular project updates will be provided to the Portfolio Holder for Sustainable Homes and Communities, with further reporting determined by the scale of project and to be set out in a communication strategy.

Housing Review Board (HRB)

21. Progress on the plan will be routinely reported to the Housing Review Board to provide oversight on delivery, risks and track performance against the plan proposals.

Decision Making & Delegated Authority

22. Strategic decisions will be subject to existing Council standing orders. In order to ensure smooth delivery, delegated authority may be sought on a project by project basis to enable the timely delivery of homes. In such circumstances delegated authority will be sought at the point of project approval.

Conclusion and Next Steps

23. Build and Buy – A Housing Investment and Delivery Plan for East Devon is a bold, ambitious and proactive response to the District's housing challenges. It should be noted that the development process can be lengthy and complex with the potential for lengthy delays, particularly at the planning and pre planning stage. Multiple external factors such as inflation, particularly on build costs and labour, may adversely affect development viability and necessitate a deviation from the plan target. As such, the hugely ambitious target of 500 homes over 5 years should be seen as an aspirational target.
24. The next steps will include:
- Finalising site feasibility prioritisation and engagement plans
 - Establishing delivery partnerships and a pipeline of acquisitions
 - Regular progress reporting to Members, in addition to regular review to monitor delivery, risks, and financial performance.
 - Seeking formal approval of the HRA Business Plan which will provide the strategic financial investment framework for financing the plan.

Financial implications:

The financial implications are significant with the increase of debt proposed at £100m. The principle being debt costs will be met from available rental income from the new properties after assumed external funding. Each scheme that is proposed will require these details to be confirmed before approval is given.

Legal implications:

As is indicated in the report, strategic decisions will be subject to existing Council standing orders. In order to ensure smooth delivery, delegated authority may be required on a project by project basis to enable the timely delivery of homes.

Build & Buy

A Housing Investment and Delivery Plan for East Devon






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Foreword

As the Portfolio Holder for Sustainable Homes & Communities, I am proud to present Build and Buy – A Housing Investment and Delivery Plan for East Devon, setting out a very ambitious roadmap to deliver 500 new homes over the next five years.

Safe, secure, and affordable housing is the foundation of a thriving community. It supports health, education, employment, and wellbeing and is at the heart of what makes our area a place where people want to live, work, and grow. This plan represents our commitment to meeting the needs of our residents, addressing local housing pressures, and ensuring that no one is left behind.

We are responding to the challenges faced by many households: rising housing costs, growing demand, and the urgent need for more sustainable and adaptable homes. Through a mix of council-led development, partnerships with housing associations, and maximising the use of our land and assets, we are determined to deliver a diverse range of homes that are high-quality, energy-efficient, and tailored to the needs of families, older residents, young people, and key workers alike.

Delivering 500 homes over five years is a significant ambition. It requires strong leadership, collaboration across sectors, and continued engagement with our communities. This plan reflects our shared ambition: to build not just homes, but places people are proud to call home.



Councillor Dan Ledger

Portfolio Holder for Sustainable Homes & Communities

Introduction

Build and Buy – A Housing Investment and Delivery Plan represents a significant step forward for the Council. Outlining our ambition to deliver 500 new homes for local people over the next 5 years.

The plan and ambition is embedded in the Councils Housing Revenue Account Business Plan and reflects the priorities and housing need outlined in our Housing and Homelessness strategies, our Local Plan and the Councils Strategic Plan for supported and engaged communities.

This plan establishes the vision and roots to delivery. It will take ambition, challenging decisions and determination to provide homes for local residents, it can only be achieved through strong collaboration with Developers, Government, County, Town and Parish Councils, and a range of partner organisations.

The plan is set in the backdrop of Local Government Reorganisation. As such it will act as a live vision document that will evolve and adapt with organisational change.

The Council play critical role in the affordable housing market, as both local planning authority and as a stock holding authority. But it has the scope to do more, through direct delivery, strategic acquisitions, effective partnerships and a proactive approach. The Council can increase supply and deliver homes that meet real local need.

1. Background

It has been widely reported that the housing market and particularly the affordable housing sector, across the Country is under acute pressure.

East Devon is no different, with affordability and access to homes being a key area of pressure. The Report of the Devon Housing Commission (2024) identifies an acute shortage of affordable housing across Devon, which is an impediment to economic growth. The report recommends increasing the range of housing

options available, emphasising homes suitable for young people struggling to enter the housing market and the elderly who lack access to accessible and adaptable housing, to reduce affordability pressure and improve health outcomes.

The District comprises a multitude of settlement areas from its existing principal Towns of Exmouth and Honiton to rural & coastal communities. More than half of the district is designated as National Landscape, with 30 Conservation Areas and home to the "Jurassic Coast" World Heritage site. These environmental constraints make East Devon a beautiful place to live and work but the delivery of new homes very challenging.

New development has been focussed on the district's new town at Cranbrook, and the West End of the district, which continue to deliver a good proportion of affordable housing. However delivery of new affordable homes across the wider district has been lower, which creates a challenge for the Council as a housing authority in ensuring there is sufficient supply of affordable homes, particularly in those primary settlements where need is greatest and established community networks exist. The plan will seek to address that by focusing on the areas of the greatest need.

Affordability generally across East Devon is also a significant challenge for residents wishing to purchase a home. The average house price in East Devon, as at April 2025 was £346,629¹, over 10x the average salary.²

The demand for affordable homes continues to rise as has been demonstrated through the 2022 Local Housing Needs assessment. This assessment looked at historic supply and estimated the need for 2,784 new social and affordable rent properties and 5,227 shared ownership properties be delivered through the new local plan.

¹ <https://landregistry.data.gov.uk/app/ukhpi/browse?from=2024-04-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2F-east-devon&to=2025-04-01&lang=en>

²

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/dataset/placeofworkbylocalauthorityshetable7> - Mean £33,500

The Councils own Housing waiting list, illustrates a ‘live’ picture of need. Devon Home Choice (the housing allocation system for Devon) indicates that there are 2344³ households registered on the portal for an affordable home.

2. Historic Delivery

In 2024-25 there were 225 new affordable homes delivered through the planning process, as s.106 dwellings or delivered as part of affordable housing providers development pipeline. Despite this excellent level of new delivery, the total need vastly outweighs supply.

3. Housing Types & Tenures

As a Council we provide homes to meet a range of local housing needs. Any new properties acquired or developed under the plan will contribute to our ability to meet these broad range of needs including, Temporary Accommodation, Supported Housing, long term settled accommodation and older persons housing.

Whilst our primary objective is to provide rented accommodation, we recognise the need and demand for affordable home ownership. Varying models exist and can often help to improve site viability. Our plans may therefore include an element of affordable home ownership on some sites.

4. The Plan: BUILD 250 Homes

A key asset of the Council is its land and existing housing stock, including redundant or underutilised garage sites. The plan proposes direct housing delivery through developing our land and assets to provide well-designed, tenure-diverse communities with homes that are energy efficient and cost effective and respond directly to local housing needs.

³ East Devon Housing Register as at 02.06.25 – Bands A-D. This increases to 4515 with Band E (no housing need) included.

A significant amount of work has already been undertaken to establish our capacity to develop on council owned assets. This has identified an array of opportunities for small, medium and larger scale estate regeneration.

To deliver our ambition of developing up to 250 new homes we will;

- ❖ Continue to review our portfolio and identify additional opportunities for development, including estate regeneration projects.
- ❖ Establish a delivery programme outlining housing numbers and a delivery timeline.
- ❖ Progress with feasibility work to analyse each site, putting forward a delivery recommendation to the Council with a detailed assessment including costs and risk factors.
- ❖ Engage and consult with local communities where development is being proposed, so schemes can be informed and shaped by local communities

The delivery mechanism for each site may vary depending on site specific factors. This may include in house procurement of a Design and Build contract, a Joint Venture or Development Agreement in partnership with a Registered Housing Provider or private sector developer, or other similar mechanism.

Given the nature of development it is expected that, subject to approval, new homes will begin to become available from the 2027/28 financial year.

5. The Plan: BUY 250 Homes

The Council has purchased 18 new homes through Housing Revenue Account (HRA) over the last 2 years on an opportunity led approach. This includes homes in Honiton, Exmouth, Axminster and Cranbrook.

The vision of this plan is for the HRA to actively re-enter the affordable housing market with a view to acquiring 250+ homes across the next 5 years.

This is envisioned as being through the following range of options:

➤ **Section 106 Allocations**

Purchasing Affordable Homes directly from developers. Early engagement with developers at the planning stage can also help to maximise affordable homes on pipeline schemes.

➤ **Off-the-Shelf Purchases**

Purchasing completed units directly from developers and agents. Provides a fast track approach to meeting urgent need and can be an opportunity where developers have excess stock.

➤ **Additionality/Package Deals**

Collaborative deals with SMEs or housing associations to unlock sites that might not otherwise proceed. Pursuing consortium purchases with partner housing providers.

➤ **Previous Right to Buy Homes**

The HRA have a right of first refusal on homes previously sold through right to buy. Where it is strategically sensible, Ex Council properties will be bought back i.e. single dwellings in a block, part of a development site or regeneration area, or where an acquisition is required to meet a specific local housing need.

To deliver our ambition of buying up to 250 new homes we will;

- ❖ Review all live and forth coming planning applications to identify a pipeline of potential s.106 acquisitions
- ❖ Engage with developers, land agents and promoters to establish strategic relationships for current and future acquisitions.
- ❖ Engage with Registered Providers to identify opportunities for delivery through partnerships.

6. Sustainability and Net Zero

The Council has declared a climate and ecological emergency and are a signatory to the Devon Climate Declaration. We have set out an ambition to achieve net zero carbon emissions by 2040.

The Council's Housing portfolio forms a major part of what are termed scope 3 carbon emissions, those being emissions the Council is indirectly responsible for i.e. from tenants occupying Council property.

Accordingly, the ‘building and buying’ of new homes will need to carefully consider the future demands of those homes and how they contribute positively and negatively to the Council’s ambition to achieve net zero by 2040.

The primary approach will be to reduce the amount of fuel needed for new homes, minimise energy consumption and maximise renewable energy generation. Collectively these measures reduce demand and carbon emissions are reduced accordingly.

The aspiration will be for any new homes to be net zero ready. Methods of achieving net zero will be considered on a case by case basis to determine the most appropriate and cost effective method.

7. Conclusion

The plan is ambitious and will require strong collaboration across the Authority and with wider partners.

Through strong strategic leadership, this plan provides an opportunity to deliver much needed new affordable housing for residents across East Devon to live work and grow.

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted