

East Devon District Council Housing Strategy 2025-2030

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Foreword

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Introduction

Housing plays a critical role in nearly every aspect of life, providing stability, security, and a foundation for well-being. Safe, affordable housing supports physical and mental health, allows for better educational and employment opportunities, and fosters a sense of belonging and community.

For individuals, it offers a place of refuge and stability, reducing the risks of illness, stress, and social isolation. For communities, good housing promotes social cohesion, economic growth, and neighbourhood safety. It helps create vibrant, resilient communities where people can thrive, enhancing the overall quality of life and reducing social inequalities.

In today's world, where health challenges are becoming increasingly complex, the connection between housing and wellbeing has never been clearer. A healthy home can prevent illness, support recovery, and promote mental wellness, while poor housing conditions can cause and exacerbate poor health and limit life opportunities.

By seeing housing as a crucial element of public health and social equality, we can work to ensure that everyone can live in a space that supports their wellbeing and allows them to thrive. This strategy lays the groundwork for us to achieve this goal.

The role of the council in housing

East Devon District Council is an integral part of the local housing framework of the district. Working together with other agencies, charities, businesses, and members of the public, teams across the council are involved in delivering many housing-related services. We are a social landlord, with over 4,000 properties across the district. We provide around two thirds of all social and affordable rented housing across the district, alongside local and national Housing Associations.

As a Strategic Planning Authority, we are required to develop a Local Plan which guides and informs decisions on all aspects of development. This includes the distribution of new housing across the district, the split of tenure, the level of affordable housing and the provision of specialist accommodation such as Sheltered and Extra Care Housing.

We offer guidance and support to private sector landlords and homeowners on issues relating to environmental health, as well as having enforcement powers to tackle breaches in this area where we have been unable to successfully engage with them.

We also have statutory obligations in respect of tackling homelessness and rough sleeping and are very proud of our work in this area. We work collaboratively with partner agencies, charities and voluntary organisations to help those who are homeless or at risk of homelessness into safe, and stable accommodation. With a focus on prevention and early intervention, our support services aim to ensure that periods of homelessness are fleeting and focussed on positive outcomes for every affected individual. We also offer a rent deposit scheme to enable households to access the private sector rented market.

Our Financial Resilience Team work to support households in our community who are undergoing economic hardship, supporting them into accommodation through Discretionary Housing Payments and Council tax support. The team also help with budgeting and life skills in partnership with partner organisations.

This Housing Strategy seeks to pull together all these elements in addition to our general housing stock and various supporting services to highlight and co-ordinate our efforts to deliver on four key strategic objectives for the benefit of current and future residents of East Devon.

Local Context

Our District



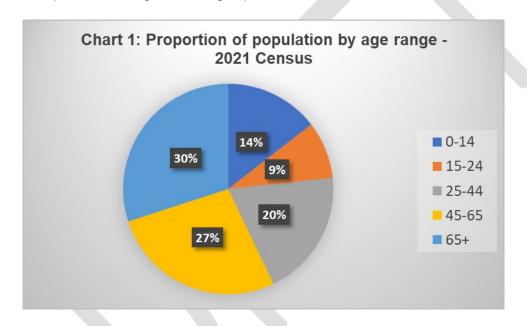
The East Devon District covers an area of 813 square kilometres and comprises the area between the River Exe and outskirts of Exeter to the west, Somerset (inland) and Dorset to the east. At the extremes, the district stretches 30 miles east to west and 15 miles north to south. East Devon is one of eight Devon districts.

The rural nature of the district is emphasised by the low population density which is 185.5 per square kilometre hectare (England and Wales average is 433.5). The district has 68 Town and Parish Councils. Our main settlements comprise the coastal resorts of Exmouth, Budleigh Salterton, Sidmouth and Seaton and, in the mainly rural inland area, the towns of Honiton, Ottery St Mary, and Axminster. We also have a new town, Cranbrook, in the west of the district that is due to expand further over the next few years, and plans for a second new community are currently being developed.

Population

In 2021 the mid-year population estimates put East Devon's population at 152,120. This is a rise of 19,663 (13.8%) from the last census figure in 2011.

In East Devon, we have an older population when compared to the national average. The median age here is close to 51, which is 10 years higher than the national figure and 57% of our population are over 45 years old. Our district continues to face numerous impacts associated with an ageing population, including an increased demand for health and social care services, the need to provide age-appropriate housing that enables people to live in their own homes for longer, and deliver sufficient residential and Extra Care housing for when fully independent living is no longer possible.



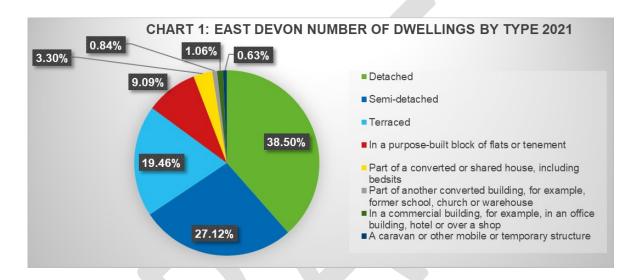
Life expectancy for residents of East Devon is the highest of all Devon districts (just over 82 years) and is in the top 10% nationally.

Most East Devon residents are from a white British background, with just 5.8% coming from another ethnic background. In recent years, we have seen a significant increase of inward migration of refugees fleeing conflict and persecution. We've welcomed over 500 Ukranian citizens, along with families from Afghanistan, Hong Kong and other countries placed here through central government programmes.

Overall, the district is relatively well-off and is in the 40% least deprived districts nationally; it is also one of the lowest crime rate areas in Britain. However, there are pockets within the district where deprivation is high.

Housing in East Devon

The 2021 census figures show there were 66,786 dwellings listed in East Devon see Chart 1 below for breakdown by dwelling type.



The vast majority of dwellings are either houses or bungalows and most of these - over 25,700 - are detached.

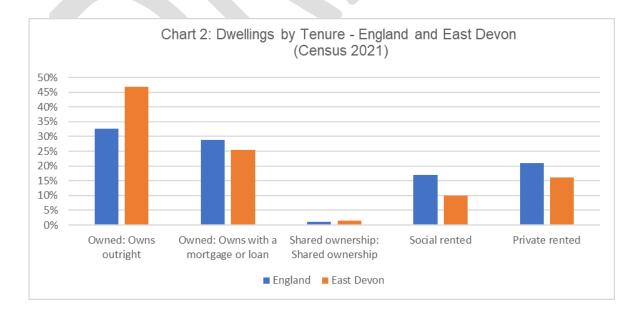


Chart 2 above shows the split of dwellings by tenure. The proportion of owner-occupied homes in East Devon is quite high at 72%, compared to the national average of 62%. Of these 47% are owned outright, compared to 33% nationally.

Of those homes that are not owner occupied, 26% of the homes are rented, with 10% defined as social rented housing (17% national average) and 16% privately rented (21% nationally).

The number of empty residential properties, short and long term, increased since 2018. According to council tax records, in October 2024 there were 215 properties which had been empty for at least 6 months, and the number of those empty for at least 1 year was 136. There were also 2,760 homes designated as second homes.

As at April 2023, East Devon District Council currently owns two thirds of all social housing stock (4165 properties). 2821 of these are classified as general needs properties, and 1344 are sheltered properties where residents have access to alarm and support services through our Home Safeguard Service. The remaining social housing stock is provided by 11 Housing Associations with roughly 2650 homes in East Devon.

EDDC is a partner of Devon Home Choice, alongside Housing Associations and the other councils in Devon to manage the fair and transparent allocation of social housing for local residents registered on the scheme.

Affordability

House price to workplace-based earnings ratio - Office for National Statistics (ons.gov.uk)

Area	House Prices	Earnings	Affordability
England	£290,000	£35,106	8.26
South West	£310,000	£33,450	9.27
East Devon	£350,000	£35,058	9.98

Private rent levels are amongst the highest in Devon, and they have risen considerably in the last three years. Between 2021/22 and 2023/24 the price of renting one and two bed properties has increased by 12%, with even greater increases in larger properties (18% for three beds, and 26% for four beds)..

Table 3 – Monthly average private rent costs by bedroom size

Year	1 bed	2 bed	3 bed	4 bed
21/22	£550.00	£725.00	£870.00	£1,195.00
22/23	£535.00	£700.00	£895.00	£1,250.00
23/24	£616.00	£812.00	£1,025.00	£1,508.00

The Local Housing Allowance rates – the maximum standard amount that the housing element of Universal Credit will provided towards rental costs - are insufficient to meet the average private rent level in the district, further emphasising the lack of affordable housing available for those on low incomes.

Table 4 – comparison of average private rent figures from Sept 24 with current Local Housing Allowance rates

	Studio/room	1 Bed	2 Bed	3 Bed	4+Bed
LHA Rate 2024/25	£404.11	£529.99	£684.98	£824.99	£1,100.00
September 2024					
average rent	£450.00	£621.00	£816.00	£1,030.00	£1,504.00
Shortfall	£45.89	£91.01	£131.02	£205.01	£404.00

Key Objectives

Set out below are the four key objectives around which our work will be focused.

Objective 1: Delivering person-centred housing services

Objective 2: Preventing Homelessness and Rough Sleeping

Objective 3: Improving the standard of homes and communities

Objective 4: Increasing the supply of homes

In many ways, these objectives are interlinked. The fundamental impact that housing can have on health and wellbeing is the driver for ensuring that everyone has access to a home, that those homes are of good quality, safe and secure, and that we have sufficient affordable housing of all tenures to meet the individual needs of our residents.

Objective 1: Delivering Person-centred housing services.

By engaging with our customers through pro-active communication and consultation, we believe we can shape services that improve people's enjoyment of their home and communities and as a result feel happier and healthier. Whilst meeting every need may not be possible, we are committed to seeing each of our customers as individuals and will endeavour to work with them to plan their support and engage them in shaping our service delivery.

Meeting the objective

Customer Engagement

- We will ensure all staff are trained in Trauma Informed Practice
- We will provide individual assessment of need to all people referred to housing support services
- We will engage with all customers on changes to policy and procedure
- We will support our Tenant Involvement Group to improve their reach and ensure their voice is heard at Housing Review Board and wider council levels, in line with our Resident Involvement Strategy.

- We will complete Tenant Satisfaction Measure Surveys on a quarterly basis to enable more agile timely responses to live issues.
- We will consult with tenants and housing associations on a revised Tenancy Strategy which places an emphasis on support for tenants to improve their health and wellbeing.
- We will review and update our website to make it easier for residents to access information about housing services.
- We will develop a digital inclusion programme, including training and access to computers for our tenants.
- We will continue to engage with tenants on all matters relating to the delivery of our council housing, including longer term strategic planning and the best use of our existing housing stock.

Independent living and supported housing

- We will deliver our Private Sector Housing Financial Assistance policy to provide loans and grants for home improvements and adaptations to residents' homes in the private sector through the Better Care Fund and Disabled Facilities Grants
- We will work with tenants alongside care and support providers to deliver suitable aids and adaptations to council properties.
- We will work with Devon County Council to develop a Supported Housing Strategy in response to the Supported Housing (Regulatory Oversight) Act 2023 to establish current supply and demand for supported housing
- We will set up a new licensing scheme for supported housing in line with guidelines set out by MHCLG in response to the Supported Housing (Regulatory Oversight) Act 2023
- We will set out requirements for the development of Extra Care facilities and/or Residential care homes for older people, particularly in larger developments.
- We will carry out a review of our sheltered housing stock to identify opportunities for repurposing, regenerating and improving our offer to older residents.
- We will implement the upgrade of our Home Safeguard systems, embracing the latest technology to offer increased independence for vulnerable customers.

 We will work with partners to develop a range of assistive technologies to ensure access to services for those who would otherwise struggle to receive them.

Promote and support healthy living

- We will ensure that our housing staff receive relevant training in relation to health matters to support tenants and prospective tenants.
- We will strengthen links with Devon County Council Adult Social Care and Health teams to better respond to the needs of tenants and prospective tenants.
- We will work in partnership with external agencies to support people fleeing domestic abuse.
- We will seek to support households experiencing overcrowding into more suitable accommodation.
- We will engage with landlords who allow overcrowding in their accommodation and will use enforcement where necessary.
- We will look to reduce social isolation through community development events and signposting to existing activities in the wider community.
- We will seek to offer support to residents experiencing fuel poverty.
- We will provide support to resettling refugees into our communities

Objective 2: Preventing Homelessness and Rough Sleeping

We have already established the multiple benefits of safe and stable accommodation for people's health and wellbeing. People who are suffering with homelessness and rough sleeping are likely to receive none of these positive outcomes, often through no fault of their own. There is no single profile of a 'homeless person'; it can affect both individuals and families.

Several factors can increase vulnerability to homelessness. Personal circumstances such as poor physical or mental health, substance abuse issues, bereavement, or involvement in the care or criminal justice system can all play a role in someone finding themselves homeless, but often it is external factors like poverty, inequality, a shortage of affordable housing, unemployment, and welfare or income policies can further aggravate the situation.

As a local authority we have a legal responsibility to prevent and relieve homelessness and we are committed to achieving this. The impact of homelessness on individuals can be severe. It can worsen existing challenges and increase the likelihood of developing mental health issues, physical health problems, or substance abuse disorders. Given the proven link between stable housing and improved health and wellbeing, it is not only a legal responsibility but also a moral and social imperative to do what we can to alleviate and prevent homelessness.

Our Preventing Homelessness and Rough Sleeping strategy sets out how we aim to tackle this issue head on, with objectives on ending rough sleeping, maximising prevention activities and increasing the range of accommodation solutions for those impacted by homelessness.

Meeting the objective

- We will take a trauma informed approach to supporting individuals approaching our homelessness service.
- We will consider expanding our Housing First programme to assist the most vulnerable homeless people into stable accommodation and to access support from external agencies.
- We will utilise our Rent Deposit and Bond Scheme to assist homeless households into accommodation.
- Our Private Sector Liaison Officers will support homeless households into private rented accommodation and landlords requiring assistance where there are tenancy issues to prevent evictions.
- We will provide outreach to identify and assist those sleeping rough, providing early intervention to help people back into secure and stable accommodation.
- We will seek to develop a landlord forum to support landlords with carrying out their landlord functions and to encourage participation in supporting homeless households.
- We will develop a tenancy sustainment support service for both tenants and landlords.
- We will submit bids for additional funding to support and strengthen homelessness prevention and rough sleeping activities.
- We will continue to work with partner organisations to provide a range of support to secure and sustain tenancies.

Objective 3: Improving the standard of homes and communities.

Homes

In recent years there have been a number of high-profile national incidents around the quality of accommodation in both social and private sector housing, but we also know that that there are also too many people in our district who live in substandard housing. They might be living in private rented accommodation or social rented housing (including our own council properties) but some homeowners are also suffering with issues including insufficient heating, insulation, and damp and mould in their homes.

This situation must be improved, and urgently. That's why we are making it our mission to drive through improvements in housing standards across both the rented and owned sectors. In our role as a social landlord there is legislation and minimum standards that we must meet. Our private sector housing team work with private landlords and homeowners by providing guidance, access to loans and other support. However, they also have legal powers to require improvements where there is a real need.

Communities

We are committed to doing our part to foster vibrant, friendly communities across East Devon. We want our housing estates to be clean, tidy and safe for residents, with help and support available for those who are vulnerable. We are aware that anti-social Behaviour (ASB) can be an issue in some areas, though levels in East Devon are perhaps lower than in other parts of the country.

We need to find ways to reduce ASB in our communities. We are an active member in East and Mid Devon Community Safety Partnership with the police and other agencies. We also employ Community Safety and Anti-Social Behaviour Officers who work with the community to resolve ASB issues and take enforcement action when necessary. This can be achieved through a program of regeneration of our estates. We want to instil a sense of pride in our estates and communities by delivering improved community facilities, sprucing up our open spaces and providing space for community led activities and events, all done in partnership with local people and businesses.

How we will meet the objective

Safe and healthy housing

- We will undertake investigations, visits and enforcement regarding housing conditions, particularly targeting damp and mould, and excess cold or heat in the rented sector.
- Will provide advice and support to homeowners, landlords and tenants in respect of actions they can take to decrease the risk of damp and mould in their homes.
- We will work with landlords to encourage them to undertake remedial works to rental properties where required to ensure that they meet or exceed minimum standards.
- We will seek to establish links with health professionals and other partners in relation to damp and mould and other poor housing conditions, to encourage them or their patients to contact us for support in tackling any housing issues.
- We will invest in our own housing stock to ensure that all our properties meet or exceed the Decent Homes Standard.
- In line with Awaab's law, we will continue to prioritise repairs and maintenance work in council properties to resolve and prevent damp and mould in our properties.
- We will work with our contractors to ensure that our repairs and maintenance service delivers an improved responsive repairs service to our tenants.
- We will develop a longer-term asset management and planned works programme to maintain and upgrade our housing stock in line with new requirements and expectations.

Meeting net zero aspirations

- We will seek to deliver targeted energy efficiency upgrades to our own houses and will work with other social landlords to improve the energy efficiency of all social housing stock in the district.
- We will identify and bid for grant funding to help deliver energy efficiency and retrofit improvements to our social housing.
- We will help residents to access grants and loans to improve the energy efficiency of their homes, including insulation, solar panels and heat pumps.
- We will work with planners and developers to increase energy efficiency standards in new properties.

Supporting and improving communities

- We will develop a strategy for regenerating our estates, with resident inclusion at its core.
- We will work with both internal and external partners to deliver grants and cost-of-living funds to residents in most need of financial support.
- We will work in partnership with the police and other key stakeholders to tackle anti-social behaviour on our estates.
- We will explore how we can maximise the use of our community centres to support all households living on our estates.
- We will review our sheltered housing provision to ensure that it continues to provide a safe and secure environment for older people with support needs.

Objective 4: Increasing the supply of homes.

We know that there isn't enough of the right housing in East Devon. Our most recent local housing needs assessment has identified the need for over 18,000 new properties to be delivered by 2040 to meet existing and future needs. The social housing register for East Devon, Devon Home Choice, currently has almost 6,000 people on the waiting list for social housing, 3,000 of them with a current housing need. A recent Devon Housing Commission report provides substantial evidence that the county is in the midst of a housing crisis.

We are already working to address this; our emerging Local Plan aims to deliver around 22,000 additional new homes between now and 2042 with over 4,000 of these to be classed as affordable housing. This housing has to be built in the right places, considering how homes can link to sustainable transport and employment options, but also take into the account the needs of more rural communities to provide affordable housing that will enable young people to stay in the area, thus maintaining and enriching those communities. We will need to consider actions that we can take both in facilitating delivery by Housing Associations and Community Land Trusts as well as how we as a landlord can contribute to this aspiration.

Discussions are currently ongoing regarding the creation of a Devon and Torbay Combined Council Authority. This would provide a formal and legal basis for joint working between both the County Council, Torbay Council and the eight district

councils across Devon and deliver additional funding and powers to make improvements in the local community. This would include the provision of housing across the whole county, which should provide more opportunities for our district to deliver more affordable housing for local people.

As well as new homes, our strategy will need to address how we make best use of existing housing. In October 2023 there were 312 homes that had been empty for more than 6 months. We need to take action to bring these empty homes back into use. We know that there is limited social housing across the district, so we need to make sure that this is allocated efficiently, by minimising instances of overcrowding and under-occupation.

How we will meet the objective

Deliver more affordable homes.

- We will work with Community Land Trusts to deliver affordable housing in rural communities for the local population through financial assistance packages to support the production of Housing Needs Assessments and exploratory surveys, as well as capital investment.
- We will work with developers and our planning department to secure new affordable housing delivery in line with local plan expectations and ensure that infrastructure around developments is in place to enable communities to access vital facilities and thrive.
- We will work with the CCA and Homes England to secure investment in affordable housing within East Devon.
- We will produce a Housing Investment and Delivery Plan that will define how we intend to deliver more Council housing to meet the needs of households across the district.
- We will support other social landlords to deliver more affordable homes across the district.
- We will explore opportunities for affordable housing for key workers.
- We will lobby central government for more flexibilities to maximise opportunities for, and investment in, the development of affordable housing.
- We will consider the development of alternative and innovative affordable housing solutions.
- We will seek to utilise commuted sums to maximise affordable housing delivery across the district.

- We will work with planning and advocates for the Gypsy and Traveller community to ensure that we meet their housing needs.
- We will support Government initiatives for the provision of housing for refugees.

Make best use of existing housing

- We will implement our refreshed Empty Homes Strategy to bring long term empty homes back into use by encouraging and supporting homeowners to bring these properties back into use.
- In line with the Environmental Health Enforcement Policy and Private Sector Housing Enforcement Policy, we will consider enforcement measures where empty homes are causing a nuisance to the public by being unsafe or verminous, where owners are either not engaging with the council or cannot be traced, and where there is little prospect of empty homes being brought back into use voluntarily.
- We will work with social landlord partners to effectively manage the stock of available affordable rented homes in the district to address housing needs by tackling overcrowding and under-occupation and ensuring that adapted properties are suitably allocated.
- We will investigate ways to further incentivise downsizing in the rented sector.
- We will decommission sheltered housing that is no longer fit for purpose and redesignate as general needs accommodation or redevelop where appropriate.

Strategic Context

Strategy Map

The EDDC Housing Strategy has an influence on, and is influenced by, a number of other strategies both within and outside of the Housing Service. The diagram below sets out where our strategy fits in the broader strategic framework of the council.

[INSERT STRATEGY MAP]

Council Plan 2024-2028

The Council Plan [link] provides the framework and direction for the council's work in providing services to our residents and businesses.

It has four key priority areas:

- 1. A supported and engaged community that has the right homes in the right places, with appropriate infrastructure.
- 2. A sustainable environment that is moving towards carbon neutrality and which promotes ecological recovery.
- 3. A vibrant and resilient economy that supports local business, provides local jobs and leads to a reduction in poverty and inequality.
- 4. A well-managed, financially secure and continuously improving council that delivers quality services

East Devon Local Plan 2020 - 2042

The Local Plan [link] is created to guide and inform decisions on where development will take place in East Devon and is the key local document that is used in determining planning applications. This plan is currently in the final stages of production.

East Devon Climate Change Strategy 2020 – 2025

The Climate Change Strategy [link] sets out an ambitious programme of action to not only reduce our carbon emissions year on year, but also to mitigate against the threats that climate change place on our community. This strategy is due to be updated this year.

Preventing Homelessness and Rough Sleeping Strategy 2024 – 2028

Our Preventing Homelessness and Rough Sleeping Strategy [link] is a statutory document that sets out how we will seek help people who are homeless or at risk of homelessness in East Devon. Although this strategy is separate from our Housing Strategy, their goals and aspirations are clearly interlinked.

Public Health Strategy 2024 - 2027

Our Public Health Strategy details our priorities for helping to improve health and wellbeing in East Devon. One of the key public health priorities set out in the strategy relates to homelessness, housing and indoor environment factors.

EDDC Tenancy Strategy

This strategy sets out East Devon's approach to tenancy issues and reflects the housing needs and priorities for the district. It lays down the parameters that Registered Providers of social housing working in the district should have regard to. This strategy will be reviewed following the adoption of this Housing Strategy to ensure that it continues to reflect the priorities of the council and our social housing tenants.

National Context

Many of our actions as a local authority are guided by or enforced through national policies and legislation, including those highlighted below:

National Planning Policy Framework (NPPF)

The NPPF [link] establishes the overarching principles and priorities for planning in England. It emphasizes sustainable development, economic growth, protection of the environment and social inclusion. It outlines specific policies on various aspects of planning including Housing. This was revised in 2024 following the election of the Labour government.

Housing Act 1996

The Housing Act 1996 is an important piece of legislation that primarily deals with housing and homelessness. It introduced significant changes to housing law and policy, addressing various aspects of housing provision, homelessness prevention, and social housing.

Many of the provisions in the Act have been strengthened through further legislation. For example, the Act sets out the duties and responsibilities of local authorities towards homeless individuals and families, including the provision of advisory services and temporary accommodation. This has since been strengthened, first through the 2002 Homelessness Act and then through the 2017 Homelessness Reduction Act.

Homelessness Reduction Act 2017

The Homelessness Reduction Act extended the duties for all local authorities to help all those who are homeless or threatened with homelessness set out in the 2002 Homelessness Act. Previously these duties only extended to those assessed as being in priority need for accommodation and to those who had not become homeless "intentionally". These stipulations have now been removed, and the length of time that Councils are required to provide prevention and relief assistance was doubled to 56 days.

Social Housing Regulation Act 2023

The Social Housing Regulation Act [link] was introduced in response to the Grenfell disaster in 2017 and seeks to rebalance the relationship between social landlords and their residents through greater transparency and regulation. It links to other legislation including the Building Safety Act 2022 and the Fire Safety Act. The Regulator of Social Housing has been given greater powers to inspect and tackle landlords who fail to meet their responsibilities to tenants.

Domestic Abuse Act 2021

The Domestic Abuse Act 2021 is aimed at addressing and preventing domestic abuse more effectively. It was introduced to address gaps in prior legislation and

to provide clearer definitions, improve victim protection, and establish stronger legal measures to handle offenders. The act defines domestic abuse broadly, including physical, emotional, economic, and coercive control, and explicitly acknowledges children as victims if they experience abuse in their household.

Future Homes and Buildings Standard

The government have committed to introduce a Future Homes Standard by 2025. This standard will seek to ensure that new build homes are future-proofed with low carbon heating and world-leading levels of energy efficiency. Changes are still being consulted on, but it will complement existing building regulations to ensure that new buildings produce over 75% less carbon than those built to current standards. There is also the possibility that any renovations or extensions to existing homes will also need to meet the new standards for making homes warmer.

Decent Homes Standard

The Decent Homes Standard [link] sets minimum standards for the condition of social homes. It is currently under review, considering raising the minimum standards for energy efficiency and strengthening the requirements in relation to Damp and Mould amongst other areas. The government are considering to what extent the standards should be applied to the private sector.

Supported Housing (Regulatory Oversight) Act 2023

The Supported Housing (Regulatory Oversight) Act 2023 came into force on 29 August 2023. The Act sets out to introduce changes to how supported exempt accommodation is regulated, new standards for supported exempt accommodation, and make changes to how this type of accommodation is regulated.

As a local housing authority, we are required by the Act to review supported exempt accommodation in our district, assessing what accommodation is available and what the expected future need for such accommodation might be. We must then use this information to publish a Supported Housing Strategy every five years.

The Renters' Reform Bill

Currently awaiting final approval, this bill proposes changes to the private rented sector and centres around ending fixed term tenancies, increasing notice periods for rent increases, the introduction of a new ombudsman to cover private landlords and the removal of Section 21 'no fault' evictions.

