Delivering Healthy Housing

The Academic-Practitioner Partnership

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1. Important inquiries are under way following the fire at Grenfell Tower, London in June 2017. This paper does not seek to anticipate the conclusions of these inquiries but rather to contribute to a more general discussion now taking place on healthy housing and the need for significant changes to housing policy throughout the United Kingdom (**Paras 1.1 – 1.3**).

2. The housing system is failing. This is a problem not only of housing supply but also of the failure to make best use of existing housing. Unhealthy housing holds back the economy and generates costs to public services. We urgently need a new approach. Despite recent legislative and consultation activity reflecting concerns about existing housing and the private rented sector, more needs to be done in recognising that housing is a key influence on health (**Paras 1.4 – 1.6**).

3. The UK has the oldest stock and the highest medical costs associated with inadequate housing of any EU member state; twenty per cent of housing in England does not meet the Decent Home Standard and twenty-seven per cent of these dwellings are in the private rented sector (**Para 1.7**). Current policy approaches do not provide the resources and mechanisms for an effective response to these and other problems (**Para 1.9**).

4. Living in inadequate housing has consequences for people's life chances. The impact is inextricably linked with other social and economic development issues, including education, training, employment, family, culture and law enforcement. Some 2.73 million households in England live in dwellings with at least one totally unacceptable risk to health, while homelessness, rough sleeping and living in temporary accommodation continue to increase (**Paras 1.11 – 1.15**).

5. Better housing will not be achieved without adequate resources of qualified local authority staff to inspect and regulate housing conditions and to facilitate the improvements that are needed, especially in the older housing stock: these have been severely curtailed and, in some cases, withdrawn in recent years, with serious consequences. It has been calculated that, in England as a whole, in the three years ending in 2016/17, local housing authorities dealt with less than 3% of the private rented sector dwellings with at least one totally unacceptable risk to health. For too many tenants and residents the local housing authority is not providing the help that is needed to improve their housing conditions. This means that changes to legislation and regulations, designed to deal with rogue or criminal landlords, may prove ineffective because of failures of local implementation (**Paras 1.16 – 1.20**).

6. Healthy housing is a key issue for the country: it is not being addressed effectively. Approaches to housing standards are fragmented and although different priorities and strategies may be appropriate in different parts of the UK, there is a need everywhere to take stock, clarify, simplify and refresh regulation and ensure effective enforcement of standards (**Paras 1.21 – 1.26**).

Reconnecting housing and health

7. From the nineteenth century onwards, housing and health have been connected by the application of standards and regulations but these arrangements are no longer working effectively. There is separate regulation for dwellings in different tenures, partly through different regulation for new and existing dwellings. Planning guidance on good design also operates separately from and does not connect enough with concerns about healthy and sustainable housing. Where planning permission is not required, conversions, extensions and other adaptations may result in seriously sub-standard accommodation. This fragmented system of building and planning regulations fails sufficiently to protect tenants, other residents, neighbours and neighbourhoods (**Paras 2.2 – 2.5**).

8. Standards used to measure crowding and space need urgent review and consolidation. The present law does not ensure that existing housing meets appropriate modern standards (Para 2.6). New designs may conform to building regulations but there is a significant risk of problems unless Housing, Health and Safety Rating System (HHSRS) considerations are applied from the outset, as part of a unified system of housing standards (**Para 2.6**).

9. There are increasing concerns that regulation and inspection in blocks of flats is not operating effectively. The rights and responsibilities of landlords, long leaseholders and tenants are sometimes unclear, and inconsistent practice about inspection and enforcement presents serious risks (**Para 2.7**). There are concerns, too, about regulations to ensure properties that are let meet a minimum acceptable healthy housing standard. All rental dwellings in the private, public and social rented sectors should be subject to a test, both at the time of letting and throughout the tenancy, that they are fit and free of any totally unacceptable hazards (**Paras 2.6 – 2.8**).

10. The arrangements under which housing benefit is paid in respect of sub-standard rented accommodation, including for some households with exceptional needs, should be reconsidered. There are no circumstances where public funds should be used to support the provision of sub-standard housing (**Para 2.9**).

11. All regulations relating to housing and planning should incorporate the same definition of a dwelling; and common housing and health standards should be developed for all dwellings, irrespective of tenure and dwelling type. The same considerations related to health and housing should be incorporated in regulations for both new building and the use of existing buildings. Building regulations, the Housing Health and Safety Rating System and planning policy guidance should be linked together and include common definitions and approaches. This should extend to measures on energy efficiency; and

some other regulations should be updated, for example, parts of the Operating Guidance for the HHSRS (**Para 2.11**).

12. The establishment of the Regulator of Social Housing as a standalone body may be an opportunity to review the regulation of the consumer standards of social housing providers, especially regarding tenants' and residents' experience of service standards; and the general attitude to tenant involvement in governance (**Para 2.11**).

13. Where the state has legislated to set standards and regulations, the state itself should be responsible for inspection and enforcement. Passing responsibility to private agencies or relying on self-certification risks conflicts of interest and does not give confidence in the integrity of the system. (**Para 2.11**). Effective inspection should apply across all tenures and normally be led by local authority Environmental Health Officers (**Para 2.12**).

14. There should be access to aid and advice, including legal aid to enable tenants and owners to bring legal rights to bear (**Para 2.11**).

Energy efficiency and fuel poverty

15. Much greater priority should be given to energy efficiency and management in dwellings. High energy use, especially in older housing, puts pressure on household budgets with sometimes adverse effects on health and wellbeing. Subsidising or capping energy prices to protect households with low incomes is likely to be less effective than an active policy to improve the energy efficiency and energy management of both new and existing dwellings. Arguments for an action plan to make all housing energy efficient are compelling and this should be an infrastructure priority (**Paras 3.1 – 3.4**). Higher energy performance standards must be adopted, including a requirement for new housing to be built to a zero-carbon standard; and support for low income owner occupiers to improve energy efficiency in their dwellings (**Para 3.4**).

Providing healthy and safe housing in every tenure

16. The adoption of common definitions and of standards and energy efficiency measures that apply across all tenures is the starting point for this discussion (**Para 4.1**).

The social rented sector

17. Policies towards social housing in recent decades have been largely input based. The type, size, costs and spatial distribution of the stock that remains has not been planned and bears no relation to demographic patterns, the incidence of homelessness or overcrowding; or problems of inadequate, unaffordable or insecure housing elsewhere in the housing system (**Para 4.2**).

18. The independent inspection of social landlords, as delivered through the Audit Commission, was dismantled in 2010: increased awareness of the consequences of this

has followed the Grenfell Tower fire and the light it has cast on matters of housing management policy and practice (**Para 4.3**).

19. There is a crisis in the governance of social housing, whether provided by local authorities or other registered providers, including housing associations. Local accountability to residents is inadequate and largely disregards tenants' and residents' experience, knowledge and concerns (**Para 4.4**).

20. Important issues have arisen about the management of leasehold properties and in some cases the fragmentation of ownership, policy, regulation and inspection following Right to Buy and other privatisations has put residents at risk, especially in high rise and other flats owned and managed by both public and private sector landlords (**Paras 4.5 – 4.6**).

The private rented sector

21. The growth of the private rented sector in recent years has increased the number of households in poor housing and many of the worst problems of unhealthy housing are in this tenure. Parts of the sector are well managed and provide suitable accommodation but tenants generally lack security, while local authorities' capacity to enforce regulations designed to protect them has become patchy and insufficient (**Paras 4.7 – 4.8**).

22. In England, there have been incremental steps since 2015 to address problems in the sector (**Paras 4.9 – 4.12**). These changes are welcome but fall short of the comprehensive approach that is needed and their impacts are difficult to assess (**Para 4.13**). By contrast, recent legislation in Scotland has addressed stability and security in the sector and over time, should change the expectations and behaviour of landlords, tenants and investors. A new form of tenancy has been introduced, with no end date, giving tenants greater security and landlords a more accessible repossession process. All disputes will be heard in a new specialist tribunal and all letting agents are required to register and adhere to a code of practice. The new arrangements are expected to have an increasing impact on how the private rented sector works, as new tenancies increase in number and existing assured and short assured tenancies come to an end (**Paras 4.14 – 4.15**).

23. Private renting is expected to continue to expand in the UK and the cases where tenants' health and wellbeing are insufficiently protected and where family life and life chances are damaged will also grow unless, as in Scotland, steps are taken to improve security of tenure, provide a better deal for landlords and tenants, and eliminate the activities of so-called rogue or criminal landlords (**Para 4.16**).

24. A pro-active and more ambitious agenda for the private rented sector would support and encourage the provision of well managed housing with reasonable standards, with a registration system for private landlords and the properties they let, and with a tax-deductible charge for this that would help to finance local authorities' activities in relation to private housing. Actions to reward responsible and professional landlords

might include tax incentives for the improvement of dwellings to specific high standards of property condition, energy efficiency and management. At the same time, local authorities would be required to take rapid enforcement action against landlords who fail to meet their legal obligations, including action to remedy defects and to take over management of properties in certain cases (**Para 4.17 – 4.19**).

The owner occupied sector

25. Many owner occupiers live in older properties below the Decent Home Standard and problems of cold, damp and inadequate housing are significant, especially among elderly owners. In 2016, non-decent housing in the sector increased in England to 2.9 million dwellings, or nearly 20% of the sector stock (**Paras 4.20 – 4.21**). In the past there were active urban renewal policies throughout the UK to improve and modernise older housing, and until 2011 grants were available for this. Since then, there have been limited funds to support the work of a declining number of Home Improvement Agencies (HIAs) providing a service usually of adaptations funded by Disabled Facilities Grants (DFGs). The withdrawal of or downward trend in funding reduces the likelihood of some older owners taking action to modify or improve dwellings that are inefficient and hazardous, if they remain unimproved (**Paras 4.22 – 4.23**). Policies must address this growing problem.

26. HIAs help older households to repair, improve and adapt their housing: this can lead to improvements in health; may prevent hospital admissions; and can help free up hospital beds by making patients' housing suitable for them on discharge. Funding should be increased substantially to support existing HIAs and to establish new ones (**Para 4.24**).

27. DFG-aided adaptations play an often highly cost-effective part in enabling older and disabled people of all ages to live independently and safely in their homes, with consequent benefits for them and for the NHS and social care (**Para 4.25**).

28. A review of past experience of urban renewal policies should be undertaken to identify other successful ways of reducing levels of unhealthy housing affecting lower income owner occupiers. Establishing local partnerships and reintroducing funding to invest in a new generation of these programmes would be cost effective, address energy efficiency and fuel poverty, and contribute to policy objectives in community engagement, health and other service areas (**Para 4.25**).

Conclusions

29. Because housing is a strong influence on health, housing policy is also, in part, a health policy. At present, it is failing in this respect (**Para 5.1**).

30. Greater coordination of health, housing, energy and other policies requires a Minister responsible for delivering this, achieving better cross-departmental working and integration between policy areas (**Para 5.2**).

31. The costs of housing falling on households and on different parts of government need careful analysis and consideration (**Para 5.2**).

32. There must be continuous monitoring of health and safety in older housing. Existing national surveys are well established but reliable house condition data are not available at local authority level. This hinders effective policy development (**Para 5.3**).

33. Future policy options should take account of lessons from past policies in the countries and regions of the UK and in other countries. Making home energy efficiency and energy management an infrastructure priority would add a new dimension and further benefit low income households (**Para 5.4**).

34. An ambition for the UK would be to improve its relative position in international comparisons of health and wellbeing, where high standards of housing make a significant contribution (**Para 5.5**).

35. While recognising variations in conditions and needs in the localities, regions and nations of the UK, a framework of common definitions and standards across planning, regulation and inspection, applying to all housing and to all tenures, provides the most effective and understandable basis for policy development in health and housing (**Para 5.6**).

36. A simplified regulatory system will work only if regulations are enforced more effectively, led by local authorities resourced adequately for the task. Where the state, as it should, sets standards and regulations for housing, it must be responsible for ensuring they are met (**Para 5.7**).

37. A variety of actions should be taken to deal with the issues of health and housing that exist in each of the major tenures. These would:

    - Assess risks to health and safety and provide support for the significant number of owner occupiers who live in older properties, and do not have the financial or other means to solve their problems (**Para 5.9**).
    - Include a requirement that (a) all rented dwellings in the private, public and social rented sectors should be fit and free of any totally unacceptable hazards both at the time of letting and throughout the tenancy; and (b) that other unacceptable hazards should be identified and either removed or minimised as appropriate (**Para 5.10**).
    - Ensure that the social rented sector is subject to independent inspection and accountable to tenants and other residents (**Para 5.10**).
    - Address the particular issues affecting high rise and other flats owned and managed by public and private sector landlords (**Para 5.10**).
    - Implement a pro-active strategy to change behaviours and relationships in the private rented sector by establishing greater security and stability; and by recognising and rewarding landlords that meet their obligations and provide housing of a good standard (**Para 5.11**).

1. The crisis in housing

1.1 Important inquiries are under way following the fire at Grenfell Tower, London, in June 2017. These include the Statutory Inquiry led by Sir Martin Moore-Bick and the independent Review of Building Regulations and Fire Safety headed by Dame Judith Hackitt. These enquiries will generate debate over problems in housing in the United Kingdom. Proposals are likely to focus on developing a more robust regulatory system for the future and providing assurance to residents, especially those living in high rise residential buildings and buildings with multi-occupancy, that the buildings they live in are and will remain safe.

1.2 This paper does not seek to anticipate the conclusions of these inquiries. However, it suggests that the debates they trigger should feed into a more general discussion of healthy housing and changes to housing policy. At present the housing system operating in different parts of the UK fails to deliver safe and healthy housing to too many households. Since we published our paper *Good Housing: Better Health* in July 2016 there has been increased awareness of and concern about how housing impacts on health and other agendas. Indications of this are the investigations being carried out on matters of health and housing by the All Party Parliamentary Group for Healthy Homes and Buildings, the Housing, Communities and Local Government Committee inquiry into the role of local authorities in the private rented sector and the preparation of a note by the Parliamentary Office of Science and Technology on housing and health in the private rented sector, as well as the inquiries following the Grenfell Tower fire. Questions about standards and performance in housing have come to the fore and seem likely to bring about very necessary change.

1.3 There is an opportunity to give greater attention to healthy and safe housing as part of the discussion of ways forward for housing policy in the future. Although this paper focuses on arrangements in England the issues are relevant across the United Kingdom. The same threats to health apply in Scotland, Wales and Northern Ireland but there are some different policies in place and different initiatives being taken to address problems. This paper recognises that, throughout the UK, housing is a key influence on health; and that housing policy should deliver healthy housing and connect housing and health.

Background

1.4 It has become common to refer to a failing or broken housing system in England and across the United Kingdom. While this often refers to failures to build enough housing there is also a failure to ensure that the dwellings people live in do not damage health and increase vulnerability in education, employment or other arenas. Housing conditions in the UK now fall behind those of other countries[1] and past progress to improve living conditions has not been built upon. Effective action is not

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[1] Eurofound (2016), *Inadequate housing in Europe: costs and consequences,* Publications Office of the European Union, Luxembourg

being taken to address problems associated with unhealthy housing. These problems will not be resolved simply by building more housing.

1.5   In a previous paper *Good Housing: Better Health*[2] we argued that an appropriate response to the current housing crisis would involve increasing housing supply and making the best use of existing housing. Unhealthy housing holds back the economy and generates costs to public services. We urgently need a new approach. There has been legislative and consultation activity that reflects concerns about failings in policies for existing housing and for the private rented sector. But the actions that have been taken do not recognise sufficiently that housing is a key influence on health and that housing policy is, in part, health policy. There is more that should be done to balance current concerns about housing supply with actions to ensure both existing and new housing meet appropriate standards that are maintained over the life of properties. Our 2016 paper and the Green Paper published in 2017 by the All Party Parliamentary Group for Healthy Homes and Buildings[3] drew attention to the nature, scale and costs (health, education, employment, homelessness) associated with inadequate, inappropriate and insecure housing; and the 2018 report of the Communities and Local Government Select Committee recommends a national strategy on housing for older people in England that takes account of the links between housing, health and social care[4].

1.6   Housing in the UK is a devolved matter and policy approaches have differed between England, Scotland, Wales and Northern Ireland[5]. Scotland and Wales have introduced legislation to implement a new framework for the private rented sector with comprehensive landlord registration schemes. Scotland has abolished additional fees and charges by letting agents and the Private Housing (Tenancies) (Scotland) Act 2016 introduced a new form of PRS tenancy. In Wales, the Renting Homes (Wales) Act 2016 will replace existing residential tenancies when it is fully commenced. Consultation is also underway in Wales on fees charged to tenants in the private rented sector and on proposed regulations for determining if a dwelling is fit for human habitation[6]. In Northern Ireland private landlords must register on a central database in order to let properties and there has been discussion of the role and regulation of the private rented sector. In England, the Coalition Government was less interventionist but measures were introduced to increase transparency around letting agents' fees and the Housing and Planning Act 2016 strengthened the sanctions available to tackle rogue landlords. Some appetite for further intervention

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[2] The Academic- Practitioner Partnership (2016), *Good Housing: Better Health* https://www.birmingham.ac.uk/Documents/college-social-sciences/social-policy/SPSW/Housing/2016/good-housing-better-health-2016.pdf

[3] The All Party Parliamentary Group for Healthy Homes and Buildings, Green Paper, *Building our Future: Laying the Foundations for Healthy Homes and Buildings,* July 2017

[4] House of Commons Communities and Local Government Committee, (2018) *Housing for older people*, Second Report of Session 2017-19, HC 370 https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/370.pdf

[5] For example: Wilson W., Baxter J., Berry K. and Murphy E., *Comparing private rented sector policies in England, Scotland, Wales and Northern Ireland,* House of Commons Library, Briefing Paper Number 07624, 21 July 2017.

[6] https://consultations.gov.wales/consultations/renting-homes-wales-act-2016-fitness-human-habitation

has also been evident. The Queen's Speech 2017 included a commitment to introduce a draft Tenants' Fees Bill that would prevent landlords and agents from charging tenants certain fees and would cap security deposits. Consultation on extending Houses in Multiple Occupation (HMO) licensing to smaller properties and the introduction of minimum room sizes in HMOs has also commenced and the government has indicated its support for the private members bill sponsored by Karen Buck MP[7].

1.7   Our previous paper showed that unhealthy housing generates costs for public services and holds back the UK economy:

- The UK has oldest stock and the highest medical costs associated with inadequate housing of any EU member state;
- 20% of housing in England does not meet the Decent Home Standard;
- 27% of households renting privately are in housing below this standard;
- Cold housing and fuel poverty lead to excess winter deaths and negatively affect children's educational attainment, emotional wellbeing and resilience;
- Inadequate and insecure housing and overcrowding affect educational performance, health and participation in the economy;
- 12% of the UK's carbon emissions come from housing. Improvements in thermal efficiency are essential for targets to reduce carbon emissions to be met;
- Many households in unhealthy housing are unable to remedy the problem themselves.

1.8   Serious implications arise from this:

- Housing and the home are well-recognised as environmental and social influences on health, with housing quality affecting mental, physical and general health status;
- Failures in housing impose more severe burdens on health and other policy areas than if housing policy performed better in terms of health and wellbeing;
- Increased funding and other support to upgrade older housing will generate substantial and continuing savings in the costs of health care; and will contribute to better education, employment and economic outcomes;
- We must balance the policy emphasis on new building and address the condition, affordability, suitability, appropriateness and security of existing housing;
- All housing should be treated as part of the infrastructure crucial to strengthening economic development and improving productivity, health and education.

1.9   In recent decades, changes in housing policy and provision have meant that the UK has experienced increased problems and rising costs associated with unhealthy and

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[7] The Homes (Fitness for Human Habitation and Liability for Housing Standards) Bill, 2017 see: https://services.parliament.uk/bills/2017-19/homesfitnessforhumanhabitationandliabilityforhousingstandards.html and https://publications.parliament.uk/pa/bills/cbill/2017-2019/0010/18010.pdf

insecure housing. Current policy approaches do not provide the resources and mechanisms for an effective response. From the early 2000s onwards there has been increasing emphasis on a crisis in housing supply but government has failed to give enough attention to the existing housing stock. Low rates of new housebuilding and replacement mean that the UK's housing stock has aged rapidly, but the issues arising directly from this have not been addressed.

1.10   Although new housing is generally of a high standard, the English Housing Survey has shown that the share of housing with at least one totally unacceptable risk to health - a Category 1 hazard under the Housing Health and Safety Rating System (HHSRS) - has remained steady at 13%. This represents an unacceptable level of inadequate housing in use but means also there has been a failure to prevent deterioration in the older housing stock; to reduce the number of inadequate dwellings; to bring all housing up to the Decent Home Standard; and to introduce measures that work effectively across tenures.

The costs of unhealthy housing

1.11   This paper does not attempt comprehensively to review the evidence concerning the indirect cost of unhealthy housing. It is salutary, however, to refer briefly to some examples. Living in inadequate housing has consequences for people's life chances and will also have an economic impact at some stage. The impact is inextricably linked with other social and economic development issues, including education, training, employment, family, culture, and law enforcement.

1.12   Indirect costs which can be linked to inadequate housing include: under performance at school, lost working days, lost opportunities, reduced property value and lack of wellbeing. For example, a study completed in 2010[8] showed that children living in poor areas underperformed at all stages of school compared with their classmates from wealthier areas. Only 25% of the young people in the most deprived areas achieved five or more GCSEs at A* to C, including English and Mathematics, compared with 68% in the least deprived areas. The study showed that children living with housing inadequacies were more likely to have illnesses and take time off school, with children living in temporary housing missing school most frequently, taking off 55 school days per year on average. This study suggested that, purely based on GCSE examination results, the amount of lost future earnings for the current generation of children growing up in poor housing areas in England is £14.8 billion.

1.13   In recent years there has been a substantial growth in the number of people experiencing homelessness and in both rough sleeping and living in temporary accommodation. All of these situations increase risks to health and wellbeing and add to health service and social care costs. Children living in overcrowded housing (in particular, multi-occupied housing, bed and breakfast accommodation and hostels) are more likely to suffer from mental stress, while living in overcrowded or

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[8] Freidman D (2010), *Social Impact of Poor Housing*, London: ECOTEC

temporary housing also affects children's education because of difficulties in finding the space and quiet to study effectively at home.

1.14   According to the English Housing Survey, there are some 2.73 million households living in dwellings in England with at least one totally unacceptable risk to health. There are vulnerable elderly persons (over 65) living in 1.04 million of these dwellings and the great majority (967,000) with a vulnerable elderly person are in the private sector. This is the group to target as a priority with the help of Home Improvement Agencies as they are currently falling through the net. People who are at risk because of age, disability or other factors are made even more vulnerable by living in inadequate, inappropriate and insecure housing.

1.15   The households experiencing unhealthy housing are not all the same. They include significant numbers of older households as well as newly forming households. There are high concentrations of South Asian and African Caribbean households and of lower income and vulnerable households in older housing, in different tenures throughout the UK. And we need to address the house conditions of various groups including new migrants and established BME groups.

Responding to unhealthy housing

1.16   The number of inadequate dwellings in the existing stock has increased and the rapid expansion of the private rented sector has been associated with increasing insecurity, inadequate management and sub-standard housing. But the capacity to inspect properties and for enforcement of existing regulations designed to protect residents and ensure safe and healthy housing has diminished. Local authorities have lost some 30% of Environmental Health Officer (EHO) posts since 2010 and in 2017 around half of local authorities in England had fewer than 4 staff assigned to private sector housing work: the average number of EHOs involved with house inspections was below three[9]. Some specific examples highlight the changing pattern of staffing associated with private housing. In 2018, Birmingham, the largest local authority in England, has 3.6 EHOs working on private sector housing which accounted for more than 70,000 (almost 18%) of the city's 411,000 dwellings in 2011 and has increased since then. In Sheffield there were 61 private sector housing posts in 2005; 22 in 2011 and 34 in 2016/17.

1.17   There has been no systematic attempt by government to track changes in staffing or how effectively regulations are being enforced in England. The most substantial evidence has been obtained through Freedom of Information requests and is based on returns from 263 of the 326 local housing authorities in England[10]. It shows an uneven pattern of staffing and enforcement activity. Although there appears to have been some increase in overall staffing levels between 2014/15 and 2016/17, levels remain well below those of 2010 and fewer staff are professionally qualified. In 38 of

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[9] Battersby S (2018), *Local housing authority action on conditions in rented housing*. Report following a Freedom of Information request to local housing authorities prepared for Karen Buck MP

[10] Ibid

the local authorities none of the staff working on the private rented sector in 2016/17 were qualified EHOs. The numbers of improvement, prohibition and hazard awareness notices served was generally very low.

1.18   In many cases current levels of staffing are inadequate to address the demands associated with local authorities' responsibilities towards private sector housing and their residents, including responsibilities for Disabled Facilities Grants, empty properties, harassment and protection from eviction, houses in multiple occupation and licensing. It has been calculated that, in England as a whole, in the three years ending in 2016/17, local housing authorities dealt with less than 3% of private rented sector dwellings with at least one totally unacceptable risk to health, using the powers in the Housing Act 2004, as is their statutory duty.

1.19   The emerging picture of inspection and identification of hazards that threaten health and safety is patchy in the extreme. While some authorities use their powers extensively, some hardly use them at all. The variation is between authorities of similar types, including between London Boroughs and does not reflect differences between urban and rural or unitary and other authorities. In some cases it is argued that the pattern reflects successful use of 'informal' means or legislation other than the Housing Act 2004. But as this legislation is specifically about protecting the health and safety of occupiers, this raises questions about how actions to protect occupiers and to target rogue and criminal landlords are evaluated. Many local authorities are unable to say what improvements have been achieved through their licensing activities in the private rented sector.

1.20   For too many tenants and other residents the local housing authority is not providing the help and support they might reasonably expect to improve the conditions in which they live. In view of this there are concerns that changes to legislation and regulations, designed to deal with rogue landlords, overcrowding and other issues, may prove ineffective because of failures of local implementation.

Conclusions

1.21   Legal mechanisms and resources to prevent further deterioration in the older housing stock, let alone improvement, are inadequate. Consequently, problems of unhealthy and insecure housing that affect health, education and employment will increase. Patterns of change and the resulting vulnerabilities are likely to continue and unlikely to be reversed, whether or not there is increased housing supply. The government White Paper *Fixing our broken housing market*[11] published in February 2017, though referring specifically to England, acknowledged a crisis in housing. It signalled some widening of the policy agenda but neglected housing and health.

1.22   The expansion of the private rented sector, together with the decline of both home ownership and social housing, has changed patterns of investment in older housing. There has been a growth in poor standard, insecure private rented housing and

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[11] Cm 9352 at http://www.gov.uk/government/publications

some landlords fail to maintain and repair properties including those previously in council ownership or owner occupied. Alongside this there continue to be older owner occupiers with insufficient resources to maintain or adapt their dwelling and limited options to move house. And the social rented sector too often represents a second class tenure, unresponsive to tenants and associated with failures of maintenance, repair and refurbishment.

1.23   Against the background of inquiries following the Grenfell Tower fire, including the independent review of Building Regulations and Fire Safety[12], and criticisms being levelled at social housing, it has become evident that there is no shared understanding about how housing standards are determined, what regulations apply where, and who is responsible for ensuring that regulations are adequate and are enforced. There are additional concerns that the Brexit process could put some regulations regarded as originating in the EU (relating to energy efficiency, environment, construction and procurement) at risk, or make them too easily adjusted by Statutory Instrument, without adequate debate.

1.24   What emerges is that healthy housing is a key issue but it is not being addressed effectively. It is missed in the preoccupation with new supply and there has been a failure to review and update approaches to housing and health. Energy efficiency issues are also a key to achieving a more sustainable economy and reducing costs for lower income households.

1.25   Despite increasing concern about unhealthy housing, approaches to housing standards remain fragmented, with different standards in different parts of the UK and reference, variously, to fitness for human habitation, the tolerable standard, the HHSRS and Decent Homes. While there is a strong case for different priorities and strategies to address unhealthy housing in different places there is no clear reason why there should not be some common standards across the UK. National housing surveys that refer to house conditions should assemble data appropriate for policy but include evidence to enable comparisons within and between the different parts of the UK.

1.26   There is a need to take stock, clarify, simplify and refresh regulation and ensure effective enforcement.

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[12] *Building a safer future: independent review of Building Regulations and Fire Safety – interim report* December 2017, Cm 9551 at www.gov.uk/government/publications

2. Reconnecting housing and health

2.1 A confusing framework of regulation and inadequate enforcement of the regulations that exist are important obstacles in the way of effectively connecting housing and health and are discussed in this section.

2.2 From the nineteenth century onwards, legislative and regulatory measures have been introduced to affect housing standards and deal with housing that posed a threat to health and wellbeing. The arrangements that currently address housing and health have been put under strain by changes in housing provision and housing tenure. In recent years the effectiveness of measures to ensure adequate housing standards have also been eroded where deregulation has reduced independent verification that standards have been met[13]. The funds and staff needed to enable local authorities to meet their obligations to inspect dwellings and enforce regulations effectively, or to support owners to maintain and improve dwellings, has been diminished while the task, especially associated with an ageing housing stock and a growing private rented sector, has increased. While these issues apply generally across the UK this paper refers largely to examples that apply to England.

2.3 Regulations affecting housing and its impacts on health are partitioned and do not address health issues in common ways. Different rules apply to different tenures. There is separate regulation for new building (building regulations) and for existing dwellings (HMOs, Decent Homes, HHSRS) and the standards referred to differ. There are also different rules and processes for dwellings and other buildings; leaseholds and freeholds; HMOs and other dwellings with common parts/means of access; and special cases such as park homes.

2.4 The relaxation of building regulations has included increased self-certification and there are serious concerns that this fails sufficiently to protect tenants and other residents. This applies generally as well as in blocks of flats where rights and responsibilities have become unclear and practice is inconsistent.

2.5 Planning practice guidance and measures to encourage good design operate separately and fail to connect sufficiently with concerns about healthy and sustainable housing. Some landlords and property owners may inadvertently or otherwise introduce hazards especially where there is no requirement for planning permission to convert basements, cellars and garages. Other extensions and adaptations of properties may also generate seriously sub-standard accommodation, for example, for students and others. There are concerns about the adequacy of fire safety and other guidance for residential units above commercial premises that

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[13] For example, the Regulatory Reform (Fire Safety) Order 2005 replaced the Fire Precautions Act 1971 and replaced the requirement for fire authorities to certify designated premises with a risk assessment approach where the person in control of the premises (including landlords and those employed to manage properties, rather than an independent person) decided how to address identified fire risks

present increased risks to residents[14]. The existing system of planning and building regulations fails sufficiently to protect tenants, neighbours and neighbourhoods.

2.6   The Environmental Health professionals most directly involved have indicated that the standards used to measure crowding and space need urgent review and consolidation[15] For example, in a period when overcrowding has been increasing, smaller urban dwellings are being built and subdivision of properties has reduced dwelling and room sizes, yet there are several different standards used to assess whether a property is overcrowded. The statutory overcrowding standard in Part X of the Housing Act 1985 has not been updated since 1935. This set a minimum single bedroom size of 6.5 square metres for adults, with children between the ages of one and ten counting as half a person. In 2015, the government introduced a nationally described minimum space standard for new-build housing. This standard is different from the one described in the Housing Act 1985, with a single bedroom needing to be at least 7.5 square metres and at least 2.15 metres wide. However, this standard is optional for local authorities to adopt, as it must be included in their local planning policy if it is to be implemented in their areas. Since 1990 there has been no requirement regarding the ceiling height of rooms, nor any guidance/instructions on measuring rooms (for example, taking account of bays, chimney breasts and fitted cupboards)[16]. In practice this has left open the possibility that any rooms, including those falling below these standards, are regarded as habitable. Environmental Health Officers comment that increased housing density requirements in recent years have been associated with shrinking room sizes, multi-use rooms with bunk-style beds or mezzanine floors within rooms. There have also been moves away from natural lighting and external or through ventilation, as well as moves towards steeper stairs (such as 'alternating tread' stairs) and cramped, 'room-in-the-roof' designs. These designs may conform to building regulations but there are significant risks of building-in problems unless HHSRS considerations are applied from the outset, as part of a unified system of housing standards. The number of different space and crowding standards and sets of guidance documents being used makes enforcement of overcrowding challenging and likely to be inconsistent. Furthermore, the division of houses into multiple flats leaves some dwellings with little 'usable' space due to ceiling height restrictions, therefore it is the usable space that should be taken into account in the calculation of minimum space standards.

2.7   There are also increasing concerns that regulation and inspection in blocks of flats is not operating effectively[17]. The Right to Buy and subsequent resales have changed

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[14] Chartered Institute of Environmental Health *HHSRS - 11 years on,* December 2017
https://www.cieh.org/uploadedFiles/Core/Media/CIEH_media_releases/2017/Items/CIEH%20-%20Housing%20Health%20and%20Safety%20Rating%20Sytem%20-%20New%20Report.pdf
[15] Ibid
[16] The Housing (Overcrowding and Miscellaneous Forms) Regulations 1937 had set out how to measure the floor area of rooms and stated that any part of the floor where the ceiling height was 5 feet or less was to be discounted. These Regulations were repealed by the Housing (Prescribed Forms) Regulations 1990.
[17] Carr, H, Cowan, D, Kirton-Darling, E, and Burtonshaw-Gunn, E, (2017) *Closing the Gaps: Health and Safety at Home*, Universities of Bristol and Kent
http://www.kent.ac.uk/law/research/projects/current/healthandsafetyathome.html
http://www.bristol.ac.uk/law/research/grenfell

patterns of ownership and confusion is evident about who is responsible for safety and standards. The rights and responsibilities of landlords, long leaseholders and tenants are sometimes unclear and inconsistent practice about inspection and enforcement presents serious risks: for example, where owners replace fire doors or make other alterations that are not subject to inspection or do not require approval.

2.8   There are concerns, too, about regulations to ensure properties that are let meet a minimum acceptable healthy housing standard. Some private lettings are made without meeting the requirement (Landlord and Tenant Act 1985) that the dwelling is fit for habitation at the outset and continues to be during the tenancy. This is because, for private lettings, the legislation refers to low rent properties (where the risk is that low rents relate to low standards) but the annual rent levels used to define what is a low rent property (£80 in London and £52 elsewhere) have not been revised. Consequently, this law is ineffective. It should be replaced by a clear requirement that all rental dwellings, in the private, public and social rented sectors, should be subject to a test that, both at the time of letting and throughout the tenancy, are fit and free of any totally unacceptable hazards (Category 1 hazards under the HHSRS). There should also be a requirement to identify and either remove or minimise other unacceptable hazards (Category 2 hazards).

2.9   The arrangements under which housing benefit is paid in respect of sub-standard rented accommodation, including for some households with exceptional needs, should be reconsidered. There are no circumstances where public funds should be used to support the provision of sub-standard housing.

2.10   The current law is confusing, opaque and complex. It does not ensure that housing meets appropriate modern standards. Consequently, there are continuing failures that affect households and communities and generate high costs for health care and other services. The situation fails to give assurance to consumers and it is in the interests of both consumers and the building industry to work with a transparent and well understood regulatory system.

Recommendations

2.11   Recent events show that effective regulations related to health and housing need to be simplified, understandable and to be enforced, as follows:

- All regulations relating to housing and to planning should incorporate the same definition of a dwelling. The definition in the HHSRS is the most inclusive and is suitable for general use. This refers to 'any form of accommodation which is used for human habitation or intended or available for such use'. This definition can be applied to any form of dwelling, including mobile homes, park homes, motorhomes, caravans, tents and boats (see Appendix 1).

- Common housing and health standards should be developed for all dwellings (rather than separate rules applying, for example, to HMOs, flats, houses etc.) irrespective of tenure and should refer to means of access and health and safety

standards. Appendix 2 sets out the key stages and considerations for establishing a common set of standards.

- The same considerations related to health and housing should be incorporated in regulations affecting standards for new building (building regulations) and for the use of existing buildings. Additional specifications and standards will continue to be needed for new building but these should incorporate standards for healthy housing and connect with continuing regulation of existing housing. Building regulations, the HHSRS and planning policy guidance should be linked together and include common definitions and approaches. This should extend to measures on energy efficiency and again, this implies amendments to some legislation.

- Other regulations should be updated, clarified and simplified. For example, the Operating Guidance for the HHSRS should be updated in relation to storage and space standards and standards should be established for the floor area of rooms and for ceiling heights. These are important not only in relation to new dwellings but also to extensions and changes to existing dwellings.

- The separation of the functions of the Homes and Communities Agency into Homes England and the Regulator of Social Housing may provide an opportunity to review the regulation of the consumer standards of social housing providers, particularly regarding tenants' and residents' personal experience of service standards; as well as issues connecting health and housing, and the general attitude to tenant involvement in governance.

- Enforcing regulation is essential. Where the state has legislated to set standards and regulations for housing the state itself should be responsible for inspection and enforcement. Passing responsibility to private agencies or relying on self-certification risks conflicts of interest or lack of confidence in the integrity of the system.

- An effective inspection system should apply across all tenures and normally be led by local authority Environmental Health Officers, drawing on expertise held in other agencies, including the Fire Service and Health and Safety Executive, and be co-ordinated with other inspections including those for gas safety and electricity. The funding for inspection should be ring-fenced and enable appropriate staffing, training and supervision, and monitoring and evaluation of the implementation of measures affecting private sector housing. Local authorities should be scrutinised by an independent national body to ensure that staffing and implementation of their inspection responsibilities are carried out to the standard expected.

- As a result of the judgment in R v Cardiff CC, ex p Cross[18], a local housing authority cannot serve a notice on itself regarding unsatisfactory housing

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[18] (1983) 81 L.G.R.105; (1982) 1 H.L.R.54 - upheld on appeal at (1983) 6-H.L.R.1.

conditions (e.g. under Part 1 of the 2004 Housing Act). This has left council tenants disenfranchised and unprotected. This situation should be removed through legislation, leaving local housing authorities with a duty to enforce housing legislation in all properties, irrespective of who owns them; and bringing this responsibility into line with their capacity to give building regulation approvals and planning permissions to themselves.

- There should be access to aid and advice including legal aid to enable tenants and owners to bring legal rights to bear.

3. Energy efficiency and fuel poverty

3.1   It is important to give much greater priority to energy efficiency and management in dwellings, to specify this in law and to improve the way that different regulations relate to this. High energy use, because of inefficient design and construction, especially in older dwellings, puts unreasonable pressure on some household budgets and the way that households cope can have adverse effects on health and wellbeing in cold and damp dwellings. Air pollution, safe indoor temperatures and indoor air quality increasingly are recognised as threats to health, and better energy efficiency would improve this situation. The Department for Business, Energy and Industrial Strategy is responsible for the government's Clean Growth Strategy, designed to achieve higher growth with lower carbon emissions[19]. As part of this there are strong arguments for adopting a new infrastructure programme that gives energy efficiency greater priority and has a clear focus on health. This would also help to boost the economy, while significantly reducing carbon dioxide emissions and providing more comfortable and healthy environments for residents.

3.2   In recent years there has been increasing concern over the impact of high costs associated with inefficient energy use in private dwellings. There are also situations where landlords charge a higher rate to tenants than they pay themselves and where pre-payment arrangements forced on low income occupiers involve higher energy costs without always ensuring delivery. All of these are unsatisfactory, leaving lower income households exposed to high energy costs and action should be taken to change them. Consideration of fuel poverty has sometimes focused on low incomes and has connected with discussion of subsidising or capping energy prices to protect households with low incomes. It is clear, however, that the reason for high energy costs and the point at which most sustainable interventions to reduce costs could be made is in the dwelling. An active policy to improve the energy efficiency of dwellings, including older and new dwellings, would benefit individual households and avoid continuing annual expenditure to subsidise energy prices.

3.3   Against this background, arguments for an action plan to make all housing energy efficient are compelling. Such a plan would embrace high standards for retrofitting and constructing homes, area-based schemes led by local authorities, additional funding sources and financial incentives to encourage households to take up energy saving measures. From 1 April 2018 there is a requirement for any properties let in the private rented sector to normally have a minimum energy performance rating of E on an Energy Performance Certificate (EPC)[20].

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[19] The Clean Growth Strategy, published in October 2017 can be found on the BEIS section of GOV.UK: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/651916/BEIS_The_Clean_Growth_online_12.10.17.pdf

[20] The source is an information webpage of the Residential Landlords Association (RLA): see https://www.rla.org.uk/landlord/guides/minimum-energy-efficiency-standards.shtml

The regulations come into force for new lets and renewals of tenancies with effect from 1st April 2018 and for all existing tenancies on 1st April 2020. It will be unlawful to rent a property which breaches the requirement for a minimum E rating, unless there is an applicable exemption. A civil penalty of up to £4,000 will be imposed

Recommendations

3.4   Existing approaches to energy efficiency and fuel poverty should be taken further with actions to support high standards for housing improvement and new construction; and with funding to encourage the take up of energy saving measures. Appropriate measures include:

- making home energy efficiency and energy management an infrastructure priority;

- for any properties in the private rented sector, when they are let to new tenants, to have a minimum energy performance rating of C by 2020;

- for all existing rented properties to achieve a C rating by 2025; and for all dwellings to be brought up to this standard by 2030;

- a requirement for new housing to be constructed to a zero-carbon standard by 2020;

- support for low-income owner occupiers to improve energy efficiency in their dwellings;

- a programme to test the most attractive schemes to enable households to invest in energy saving improvements.

for breaches. There are separate regulations effective from 1st April 2016 under which a tenant can apply for consent to carry out energy efficiency improvements in privately rented properties

4. Providing healthy and safe housing in every tenure

4.1   The adoption of common definitions and of standards and energy efficiency measures that apply across tenures provides the appropriate starting point for addressing the issues of unhealthy housing that arise in every tenure. This section discusses additional and specific issues affecting the three main tenures.

The social rented sector

4.2   Policies towards public and social rented housing have changed this sector over recent decades but have largely been input rather than outcome based. Successive governments have set a framework for privatisation, subsidy and investment and waited to see what happens. The stock that has remained in the social rented sector (its type, size, costs and spatial distribution) has not been planned and variations in what is available locally bear no relation to demographic patterns, the incidence of homelessness or overcrowding, or problems associated with inadequate, unaffordable or insecure housing.

4.3   A system of independent inspection for social landlords had been developed to include inspection of activities associated with leasehold management. This system, latterly delivered through the Audit Commission, was dismantled in 2010. There has been increased awareness of the consequences of this following the Grenfell Tower fire and the light it has cast on various matters: management, maintenance, repair, refurbishment or regeneration practices, responsiveness and accountability to tenants and the speed of response to extreme housing need and homelessness. Housing associations have responded to the priorities set by government and by boards that are largely unaccountable to tenants. The direction of change and patterns of funding, organisational change and merger appear to have exacerbated problems and have not prioritised action on issues that have aroused recent criticism.

4.4   While some of these issues will be addressed by the Grenfell Tower and associated inquiries, other questions are likely to remain:

- The general level of regulation for registered providers (including councils) is inadequate.

- The funding both for new provision of social housing and for refurbishment and regeneration of existing social housing is often too limited to provide a sufficient supply of social housing locally, to improve existing dwellings to an appropriate standard and ensure that, whether or not it provides opportunities for others, regeneration benefits existing residents.

- The provision of social housing is often insufficient to respond to the needs of homeless households and those in temporary, inadequate and inappropriate housing.

- There is a crisis in the governance of social housing, whether provided by local authorities or other registered providers including housing associations: it is increasingly remote and preoccupied with matters other than health and wellbeing, service delivery and tenant satisfaction. Local accountability to residents is inadequate and management practice largely disregards tenants' and other residents' experience, knowledge and concerns.

4.5 Important issues have arisen about the management of leasehold properties, especially in multi-storey blocks. Before the Right to Buy was introduced in 1980, local authorities were monopoly owners of individual properties as well as owners of the freehold. Since 1980, ownerships have become fragmented, so that within the same blocks there can be (a) tenants renting directly from the freehold owners of the property (b) long leasehold owners who either live in the dwellings themselves *or* are landlords who let the dwellings to tenants. As this situation has developed so have complaints and conflicts over service charges and especially those for repairs and improvements. More recently attention has been drawn to the uncertainty about whether the freeholder is entitled or required to inspect and enforce modifications within properties they do not own[21].

4.6 There is insufficient clarity about responsibilities for inspection and scrutiny of leasehold management and of high rise and other flats owned and managed by public and private sector landlords:

- In some cases, the fragmentation of ownership, policy, regulation and inspection following privatisations has put residents at risk. Clear advice is needed on the procurement and inspection of refurbishment works in such situations.

- There is a need to reconsider the rights and obligations of absentee private owners of properties within blocks of flats: whether they should be required to meet obligations relating to the use of properties; and whether their properties should be subject to inspection annually and when their residents change.

- Where there are mixed ownerships within blocks, freehold landlords should have obligations and powers to 'register' occupation and use; and powers related to, for example, levels of occupancy and escape requirements for people with limited mobility.

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[21] See for example, Edward Kirton-Darling, Fire in the High Rise: Governance, Ownership and Safety, *Journal of Housing Law*, Vol. 20, Issue 5, 2017 pp.121-124. See also Carr, H., Cowan, D., Kirton-Darling, E., and Burtonshaw-Gunn, E., (2017) *Closing the Gaps: Health and Safety at Home*, Universities of Bristol and Kent

- Consideration must be given to whether some flats, especially high-rise flats with particular designs, are suitable for specific types of resident, including families with children[22].

The private rented sector

4.7   The expansion of the private rented sector in recent years has increased the number of households in poor housing and many of the worst problems of unhealthy housing are associated with this tenure. Parts of the sector are well-managed and provide suitable housing, but many lettings fail to meet appropriate standards and tenants generally lack security.

4.8   There is a body of law that appears to protect tenants where landlords do not meet their responsibilities but often, tenants are not in a position to take advantage of this themselves. This is especially so where they lack security of tenure. At present there are limited resources to enable tenants to require landlords to address problems. The private rented sector has expanded in a period when local authority staffing has been reduced and capacity to enforce regulations designed to protect tenants is patchy and insufficient. Tenants would benefit if there was a coordinated and effective system to guarantee that legal protections can be accessed and enforced.

4.9   In England there have been incremental steps to address specific problems in the private rented sector – rather than any attempt to change the way the sector operates generally. For example, the Deregulation Act 2015 sought to protect tenants from retaliatory evictions. The Housing and Planning Act 2016 introduced measures that came into force in April 2017: civil penalties of up to £30,000 as an alternative to prosecution, extension of Rent Repayment Orders to cover illegal eviction, breach of a banning order or failure to comply with a statutory notice. Other measures come into force in April 2018: banning orders for the most serious and prolific offenders and establishing a database of rogue landlords/letting agents convicted of certain offences.

4.10   At the end of December 2017 the government announced its intention, subject to parliamentary approval, to consult on and introduce further measures in England to act on bad practices, reduce overcrowding and improve standards in the private rented sector[23]. New powers would enable councils to 'crack down' on rogue or criminal landlords knowingly renting out unsafe and sub-standard accommodation. The move was presented as of benefit to 'wider communities fed up with living near shoddily maintained properties without proper bins, dumped rubbish and anti-social behaviour'. Landlords will be held responsible for making sure the council's rules on refuse and recycling are followed. Government also set out details of criminal

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[22] See for example Pearl Jephcott, *Homes in High Flats*, Oliver and Boyd, 1971. Elizabeth Gittus, *Flats, Families and the Under-Fives*, Routledge and Kegan Paul, 1976

[23] Ministry of Housing, Communities & Local Government and Alok Sharma MP, *New measures to crack down on bad practices, stamp out overcrowding and improve standards for those renting in the private sector,* 28 December 2017. See also Consultation on proposed banning order offences under the Housing and Planning Act 2016; and Houses in Multiple Occupation and residential property licensing reforms

offences which could result in convicted landlords being banned. From April 2018, someone convicted of offences such as burglary and stalking can be added to the database of rogue landlords and be barred from renting properties.

4.11   New rules will also come into force setting new minimum size requirements for bedrooms in certain houses in multiple occupation in England, to prevent overcrowding. While national mandatory licensing currently applies to properties of 3 or more storeys the new arrangements would also apply to flats and one/two-storey properties. Landlords renting any properties in England occupied by five or more people from two or more separate households will also need to be licensed. According to MHCLG, this will mean councils 'can take further action against landlords renting sub-standard and overcrowded accommodation'. As part of the licensing requirements, minimum sizes are to be specified for rooms used for sleeping by 1 adult, 2 adults and children of 10 years and younger and the licence must state the maximum number of persons (if any) who may occupy any room; and the total number, across the different rooms, for whom the property is suitable.

4.12   The government has also indicated that it will support the Homes (Fitness for Human Habitation and Liability for Housing Standards) Bill 2017 introduced as a private members Bill sponsored by Karen Buck MP. This aims to modernise the housing fitness standard and extend it to cover almost all tenancies - private, housing association and council. It would place an obligation on landlords to ensure that the property is fit, as opposed to the obligation to deal with disrepair. It will also allow tenants to take action on their own behalf, in the same way and referring to the standards used by local authorities.

4.13   While all these measures are welcome they fall short of a comprehensive approach and their likely impacts are difficult to assess. It is apparent however that impacts will be affected by the fact that tenants continue to have little security and local authorities have limited capacity for inspection and enforcement. This means the measures are unlikely to resolve issues associated with criminal landlords.

4.14   In contrast, recent legislation in Scotland has addressed stability and security in the PRS and will, over time, change the expectations and behaviour of landlords and tenants. The Private Housing (Tenancies) (Scotland) Act 2016 established a new private residential tenancy with better safeguards for landlords, lenders and investors. Since 1 December 2017, anyone taking a new tenancy signs the new Private Residential Tenancy that has replaced assured and short assured tenancies. The new tenancy has no end date and can be terminated only by a tenant giving written notice to their landlord or by the landlord using one of 18 grounds for eviction. This means an end to 'no-fault' evictions and tenants will have the right to challenge a wrongful termination. Landlords can increase rent only once a year and are required to give tenants three months' written notice of any change; while tenants can challenge the increase if they think it is unfair. Tenants who have lived in a property for longer than 6 months must be given at least 84 days' notice to leave by their landlord (unless they are at fault) and notice to quit and notice of proceedings processes are being replaced by a simpler 'notice to leave'. Landlords

are expected to benefit from a more accessible repossession process and a simplified way to give notice. All landlord and tenant disputes will be heard in a new specialist tribunal and, from January 2018, all letting agents are required to register and adhere to a code of practice.

4.15 The new arrangements in Scotland can be expected to have an increasing impact on how the private rented sector works as the new tenancies increase and existing assured and short assured tenancies are terminated. As new Private Residential Tenancies become the norm, it is hoped that both landlords and tenants and their advisors will respond to the greater security and certainty that the new tenancies provide and change their behaviours in ways that benefit both parties.

4.16 Private renting is expected to continue to expand across the UK and the number of cases where tenants' health and wellbeing are insufficiently protected and where family life and life chances are damaged, are likely to continue to grow unless steps are taken to alter how the sector works:

- The lack of security in the sector creates a climate of low expectations and poor performance. This generates high costs for tenants and public services, adversely affects health, education and employment and involves additional costs and disruption when it leads to homelessness.

- While much of the sector is professionally managed and provides reasonable standards of accommodation there is a significant part associated with low standards, exploitation of tenants and risks to health and safety; and often connected to the activities of so-called rogue or criminal landlords who can flourish because tenancies are short and legal remedies can rarely be applied before a tenancy ends. There is no effective protection for tenants and continuing evidence of retaliatory eviction attests to this.

- There should be an ambition to create an environment which works better both for landlords and tenants and which eliminates rogue and criminal landlords.

- For many landlords, short tenancies do not provide a good basis for property management. Assured tenancies are associated with high turnover, high wear and tear and tenants who do not invest in their home. Longer tenancy contracts would change expectations and behaviour and enable the balance within the sector to shift towards more constructive and sustainable relationships between landlord and tenant, with benefits for both parties.

- Increasing the length of an assured tenancy to at least 3 years and requiring good grounds for non-renewal would increase stability and provide a better environment for family life and for safe and sustainable housing. Such a change would not seem likely to threaten the interests of professional landlords but would enable the practices of criminal landlords to be challenged.

- Longer tenancy contracts should not present problems for responsible landlords. They would, however, provide a better platform for inspection and enforcement activity to improve performance by other landlords, encouraging both landlords and tenants to adopt more sustainable approaches, and reducing the costs of unhealthy and insecure housing.

4.17   This suggests, in line with changes underway in Scotland, a more ambitious agenda to alter the dynamics and behaviours that have become associated with the expanded privately rented sector in the UK. This would include redefining the rights and duties of landlords and tenants to encourage a different relationship between them, based on greater security and stability. This pro-active policy would build on the requirements set out earlier in this paper by:

- Ensuring that all rental dwellings are fit and free of any totally unacceptable risk to health at the time of letting and throughout the tenancy and that any other unacceptable hazards are identified and either removed or minimised;

- Simplifying the enforcement processes in existing housing legislation to ensure that both tenants and landlords are protected. This would reduce costs and pressures on local authorities.

4.18   The new policy would have a registration system for private landlords and each of the properties they let, and inspection of properties at the point of any new letting and annually thereafter. Registration would involve a charge (normally tax deductible for landlords) that would help to finance local authorities' activities in relation to private housing. Funding from this and other sources would be sufficient to enable local authorities to enforce existing regulations effectively. In addition:

- Local authorities would be able also to exercise their judgement over what additional approaches to licensing and regulation should be used in their area;

- Landlords and tenants would be provided with access to aid and advice, including legal aid, and resources to enable effective resolution of disputes or claims that landlords or tenants are failing in their obligations.

4.19   Within this framework a pro-active policy would have two main strands:

- Actions to reward responsible and professional landlords: including tax incentives for landlords to improve dwellings to specific high standards (including the Decent Home Standard) in relation to property condition and energy efficiency and management;

- Actions to deal with landlords who fail to meet their legal obligations: including their repair obligations during a tenancy, making it an offence for landlords to let properties that do not meet the Decent Home Standard, minimum healthy housing and energy efficiency standards. Local authorities would be required to

take rapid enforcement action including action to remedy defects and take over management of properties in certain cases.

The owner occupied sector

4.20   There is a view that home owners whose properties are inadequate or inappropriate should take responsibility for remedying this themselves. While this is reasonable in many cases it is not always practicable for older and vulnerable owners or low value properties.

4.21   Many owner occupiers live in older properties that fall below the Decent Home Standard, where problems of cold, damp and inadequate housing are significant, especially among elderly households. The 2016 English Housing Survey showed that for the first time in more than a decade, the number of owner occupied dwellings below the Decent Home Standard had increased, from 2.7 million in 2015 to 2.9 million, or nearly 20 % of the sector stock. In the past the countries of the United Kingdom adopted active urban renewal policies to improve and modernise older housing. Investment by individual owners, local authorities and housing associations was encouraged by local and national policies and strategies. But funding and activity to address the manifest problems associated with older housing has declined and this has reduced the potential for some owners to improve and maintain their dwellings.

4.22   From 1949 until 2011, local housing authorities received capital grant to support house improvement and towards the end of this period, although much less than in previous years, the capital allocated in England averaged £350 million per annum. In 2011 this 'private sector renewal' allocation was reduced to zero, removing financial support for around 200,000 households annually. At the same time other funding to help older people and for Home Improvement Agencies (HIAs) was reduced. The comprehensive spending review of 2010 reduced grants to upper tier authorities from £20 million to £10.5 million in 2014/15: these had been passed mainly to HIAs to provide low levels of repairs and improvement principally to assist older and disabled owner occupiers. The removal in 2009 of the ring-fenced 'Supporting People' revenue budget, which had funded all kinds of housing support for vulnerable people, and the loss of grants from which agencies could charge a small fee, including disabled facilities grants (DFGs), further affected HIAs. Moreover, because home improvement agencies are 'non-statutory' they are underfunded and have been closed 'just at the point that older people need them most'[24]. From 2010/11 to 2014/15 the number of HIAs in England declined by 20%, from 210 to 167. In 2004 there were 30 districts in England with no HIA and this figure had risen to 62 by 2016[25]. At present there are about 170 HIAs in England, many under local authority auspices. They provide a limited service, usually of DFG-funded

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[24] Powell, J, Mackintosh, S, Bird, E, Ige, J, Garrett, H and Roys, M (2017) Centre for Ageing Better *The role of home adaptations in improving later life*, Centre for Ageing Better p29.
[25] Foundations (2011), *Annual Review 2010/2011,* Foundations Independent Living Trust, p5; and Foundations (2015) *Annual Review 2014/2015*, Foundations Independent Living Trust, p15
http://www.foundations.uk.com/about-us/about-us/annual-reports/

adaptations, rather than the holistic service of independent agencies, yet as the number of old people grows, full scale HIAs are needed more than ever.

4.23   These trends reduce the likelihood of some older owners taking action to modify or improve dwellings that are inefficient and hazardous if they remain unimproved. In 2016 and 2017, recognising the savings to health and social care budgets resulting from timely adaptations, the government significantly increased funding for DFGs from £220m in 2015/16 to £394m in 2016/17[26] and the budget of 2017 announced a planned £473 million funding for 2017/18[27]. But reduced local authority staffing following cuts to their revenue budgets will affect how local authorities make use of this capital allocation and their capacity to assess, specify and supervise the necessary adaptations that can make a significant difference to people's lives, as well as reducing the risks to health and safety.

4.24   Policies must address the growing problem of older owners who are unable to improve their dwellings. Population projections for the UK indicate that the number of persons aged 85+ will increase from 1.4 million in 2010 to 3.5 million by 2035. This age group will continue to include a high proportion of owner occupiers and especially outright owners. Those with limited resources need support, especially in properties requiring improvement and repair, or aids and adaptations to improve health and safety and reduce the risk of accidents in the home. In particular:

- Funding should be increased substantially to support existing Home Improvement Agencies (HIAs) and to establish new ones. Their work of assisting older households to repair, improve and adapt their housing leads to improvements in health and may prevent hospital admissions. HIAs can help to free up hospital beds by making patients' housing suitable for them on discharge. Agencies give trustworthy, independent support through specification and supervision of work, advice on finance, and the selection of builders. They are said to be 'the most effective means of reaching old people who are suffering ill health because of cold or unsafe conditions in their homes'[28].

- DFG-aided adaptations, for example to bathrooms or through the installation of stairlifts, as well as in smaller ways such as the provision of handrails and banisters, play an often highly cost-effective part in enabling older and disabled people of all ages to live independently and safely. As well as their positive impact on quality of life, adaptations can also save money for the NHS and social care, helping to prevent accidents such as falls and reducing the risk of injury to carers. Recent research shows that every £1 of funding distributed to vulnerable

[26] Department of Health/Department of Communities and Local Government (2016), 2016/17 *Better Care Fund Policy Statement* p7
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/490559/BCF_Policy_Framework_2016-17.pdf
[27] HM Treasury(2017), *Policy Paper Autumn Budget 2017*
https://www.gov.uk/government/publications/autumn-budget-2017-documents/autumn-budget-2017
[28] Bennett, E, Dayson, C, Eadson, W, Gilbertson, J and Tod, A, (2016), *Warm, safe and well: The Evaluation of the Warm at Home Programme,* Sheffield Hallam University and Foundations Independent Living Trust
http://www.foundations.uk.com/media/4715/warm-at-home-report.pdf

households through the 'Warm at Home Programme' of the Foundations Independent Living Trust[29] produced almost £4 of benefits in terms of better health'[30].

4.25   A review of the past experience of urban renewal policies should identify other successful ways of reducing levels of unhealthy housing affecting lower income owner occupiers. In our view the evidence from enveloping and block repair schemes and community-based, resident-led urban renewal[31] indicates that establishing partnerships and reintroducing funding to invest in a new generation of these programmes, in appropriate places, would be cost effective, address energy efficiency and fuel poverty and contribute to policy objectives in community engagement, health and other service areas.

Recommendations

4.26   A variety of actions should be taken to address the issues of health and housing that exist in each of the major tenures. Significant numbers of owner occupiers, who live in older properties that present risks to their health and wellbeing, do not have the financial or other resources to address problems and need support. There should be a requirement that all rented dwellings, in the private, public and social rented sectors should be fit and free of any totally unacceptable hazards both at the time of letting and throughout the tenancy. There should also be a requirement to identify and either remove or minimise other unacceptable hazards. Tenants in the social rented sector are entitled to expect their landlords to be subject to independent inspection and to be more accountable to tenants and residents. The particular issues affecting high rise and other flats owned and managed by public and private sector landlords also require further clarifications of the law. In the private rented sector there is a need for a pro-active strategy to change behaviours and relationships in the sector. This should start with establishing greater security and stability; and with recognising and rewarding landlords that meet their obligations and provide housing of a good standard.

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[29] The Foundations Independent Living Trust Ltd (FILT) is appointed by the Ministry of Housing, Communities and Local Government to oversee in England a national network of Home Improvement Agencies (HIAs) and handy person providers

[30] The funding through FILT under the 'SSE Warm at Home Programme' was £637,000, distributed via HIAs in England; 183 district council areas were covered and 2,647 warm home measures took place. *Ibid*, p10.

[31] See for example Turkington, R and Watson, C eds., (2015), *Renewing Europe's Housing*, Policy Press, Bristol. Stevens, J ed., (2017) *Residents Renewing Their City*, Localise West Midlands, Birmingham.

5. Conclusions

5.1   Because housing is a strong influence on health, housing policy is also, in part, a health policy. It is failing in this respect. There is an opportunity to build on concerns about unhealthy housing in the UK and adopt a more effective approach that would generate a range of benefits. This paper has outlined a series of policy actions to simplify, clarify and connect existing regulations related to housing, health and safety and to give healthy housing higher priority within the public policy agenda.

5.2   Greater co-ordination of health, housing, energy and other policies would be more likely if there were a Minister tasked with delivering this and achieving better cross-departmental working to provide stronger leadership and integration between related policy areas. There is a need systematically to set out evidence and options, discussing what mix of policies would contribute most effectively to addressing problems of unhealthy and insecure housing in the future; and to assess what resources are needed. The costs falling on different parts of government (such as housing benefit, homelessness) and on households need careful analysis and consideration – would alternative uses of resources prove more effective?

5.3   More consideration and forward planning are essential to anticipate problems and put in place measures to respond to them. There is a need for continuous monitoring of health and safety in older housing, making fuller use of national housing survey data to focus on issues and changes and making maximum use of this resource. At present regular and reliable house condition survey data are not available at local authority level. The lack of consistent local statistics on stock condition limits effective policy development at national and local levels.

5.4   Policy options should take account of the lessons to be learned from policies pursued in the past, in different countries and regions of the UK, and in other countries. This includes building more effectively on earlier urban renewal policies that were successful in improving health and wellbeing in areas of older and poorly maintained housing, including support for low income and elderly owners. Making energy efficiency in housing an infrastructure priority would add a new dimension to this and further benefit low income households.

5.5   New legislation in Scotland and other recent initiatives should be evaluated. For example, NHS Scotland has adopted a *Place Standard Tool*[32] and this approach could be considered for other parts of the UK. Reference should be made also to approaches adopted elsewhere. For example, in the USA there is a *National Healthy Housing Standard*[33], New Zealand has developed a *Healthy Housing Index*[34], and the World Health Organisation has discussed the preparation of international guidance

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[32] The NHS Scotland 'Place' tool is available at https://placestandard.scot/
[33] The NCHH/APHA National Healthy Housing Standard is available at - http://www.nchh.org/Policy/NationalHealthyHousingStandard.aspx
[34] http://www.healthyhousing.org.nz/research/past-research/healthy-housing-index

on *Healthy Housing*[35]. In international comparative studies of housing conditions, northern and western European countries including Denmark, Germany, the Netherlands and Sweden show some of the highest housing standards in Europe and these are associated with a variety of factors[36]. The higher proportion of older housing in the UK makes meeting these standards a difficult task but does not justify the differences that exist. In Denmark, for example, despite relatively high housing standards, half of the existing stock, including 75 per cent of dwellings built between 1987 and 1995, has been estimated to require energy efficiency improvement[37]. One ambition for health and housing in the UK would be to improve its relative position in international comparisons of health and wellbeing. The evidence suggests that actions to ensure housing consistently reaches high standards are significant contributors to this.

5.6   This paper has argued for a new approach to the regulation and inspection of housing, to connect and strengthen the different systems that currently exist. A framework is needed of common definitions and standards across planning, regulation and inspection, applied as far as possible to both new and existing housing, and to housing in all tenures. This would provide a simpler, more effective basis for policy development in health and housing. It would be more easily understood by builders and developers, owners, tenants and other property users and professionals while still allowing flexibility for variations at local, regional or national levels; for specific issues in different tenures; or in cases such as housing in rural areas, student housing, and housing under different forms of ownership.

5.7   A simplified regulatory system will work only if regulations are enforced more effectively and the system is properly resourced. Where the state sets standards and regulations for housing it should be responsible for ensuring they are met. There are serious reservations about self-certification or relying on private agencies to carry out this function. The integrity of the system and public and professional confidence in it suggests that a stronger system of inspection and enforcement is needed. This should apply across all tenures and be led by local authority Environmental Health Officers, drawing as appropriate on expertise in other agencies, and co-ordinated with other inspections. For this to be effective, the current capacity of local authorities should be increased with adequate, ring-fenced finance including funds from the registration of landlords. At the same time the effectiveness of the system would be increased if tenants have greater access to aid and advice including aid to protect their legal rights.

5.8   Alongside this, actions are needed to address issues of health and housing in each of the major tenures.

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[35] The proposed WHO Guidelines for Healthy Housing is (still) in preparation, a draft is currently out for review. The 2010 statement behind the work is at http://www.who.int/hia/housing/en/

[36] Eurofound (2016), *Inadequate housing in Europe: costs and consequences*, Publications Office of the European Union, Luxembourg

[37] Vestergaard, H in Turkington, R and Watson, C eds., (2015), *Renewing Europe's Housing*, Policy Press, Bristol, Chapter 2

5.9 Significant numbers of owner occupiers live in older properties that present risks to their health and wellbeing. Some older owners in these properties do not have the financial or other resources to address problems and they need support. Increased funding for home improvement agencies and other policies targeted on this group would represent effective use of resources to address health as well as housing issues.

5.10 The social rented sector must be fully integrated into policies to improve health and wellbeing and be subject to an effective inspection and regulatory system that applies across tenures. In addition, there should be a reconsideration of the accountability of housing associations and local authorities through a system of independent inspection and by improving their accountability to tenants and residents. The particular issues in relation to high rise and other flats owned and managed by public and private sector landlords require further clarification of the law and of the rights and responsibilities of long leaseholders who live in the property and those who do not; and of sub tenants and landlords.

5.11 In the private rented sector, the rights and duties laid down for landlords and tenants are confusing and poorly enforced. This must change. There should be a requirement that all rental dwellings, in the private, public and social rented sectors, should be fit and free of any totally unacceptable hazards both at the time of letting and throughout the tenancy. There should also be a requirement to identify and either remove or minimise other unacceptable hazards. Actions to improve the situation in the private rented sector should include effective inspection and enforcement, as part of a pro-active strategy to change behaviours and relationships in the sector. This should start with establishing greater security and stability; and with recognising and rewarding landlords that meet their obligations by providing housing of a good standard. The current system of assured tenancies does not serve responsible landlords or tenants well. It fails to encourage and sustain good relationships between landlord and tenant and the expectation that tenancies will be only short term is inconsistent with investment in the property by either party. If the norm in letting properties was for tenancy agreements of at least 3 years or longer, constructive and sustainable relationships would be more common with benefits for both parties that would obviate the need for legal remedies. This would also enable properly funded local authority staff concerned with private sector housing to focus on landlords who fail to comply with the law and would facilitate more effective action to deal with criminal behaviour.

5.12 Delivering healthy housing should be a priority for housing and health policy in the future and this requires a pro-active policy across the whole of the housing system.

Appendix 1: Definition of a Dwelling

The definition of a dwelling in the Housing Health and Safety Rating System: Operating Guidance. Housing Act 2004, is as follows

' … any form of accommodation which is used for human habitation, or intended or available for such use. It includes:

> (a) what is commonly known as a 'house', whether it is detached, semi-detached or terraced;
> (b) what is commonly known as a 'flat', 'maisonette' or 'apartment'; that is a self-contained dwelling on one or more floors in a building containing other dwellings or other types of accommodation (e.g. shops or offices); and
> (c) what may be known as a 'bedsit', or 'flat', and which is not self-contained, and where there is the shared use with other dwellings of some facilities such as a bath or shower-room, sanitary accommodation, or kitchen.'

'Included as part of the dwelling are:

> (a) any paths, yards, gardens, and outbuildings etc that are associated or for use with, or give access to that dwelling, whether or not they are for the exclusive use of that dwelling, or are shared with other dwellings; and
> (b) any rights of way, easements, and common or shared parts and services necessary for the occupation and use of the dwelling, for example non-adopted footpaths, drives, and drains or private sewers.'

'Where the dwelling is a flat, maisonette or bedsit, as well as including those means of access, amenities and services mentioned … above, the dwelling also includes any rooms, passageways, circulation areas, and facilities that are shared or used in common with others, and the common structural elements, such as the roof, walls and foundations. This applies whether or not the flat or bedsit is self-contained.'

Source: ODPM (2006), *Housing Health and Safety Rating System: Operating Guidance. Housing Act 2004. Guidance about inspections and assessment of hazards given under section 9.* Office of the Deputy Prime Minister, London. Paras 2.04-2.06. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf

Appendix 2: A Note on Standards

1. The first stage is to identify a potential threat to health and then, through research, produce the evidence. There are various approaches:

   - For some threats, such as pollutants, this usually will lead to specifying or recommending safe exposure levels (for Carbon Monoxide, Sulphur Dioxide, and Noise).
   - Where the lack of something would involve a threat, it will involve specifying what should be present (a supply of water, sanitation/hygiene provisions, etc.).
   - Where the presence of something imposes a threat, stating what should not be present (such as dampness, mould, etc.).

2. The next stage is to determine how these safe levels or requirements can be met. This can involve identifying the sources, causes, or reasons for, and determining whether the threat to health can be prevented, reduced or controlled. For example:

   - The use of dangerous material (e.g. that containing asbestos fibres) can be prohibited, and where they have been used, require their safe removal, or containment.
   - Safety devices can be required (gas cut-off devices) or detectors.
   - To ensure air quality, there is the option of trying to prevent a build-up of pollutants through controlled and effective ventilation.
   - Specifying facilities for personal and domestic hygiene and sanitation, and where they should be sited, and how installed.
   - Preventative measures to avoid or reduce threats such as dampness, and falls.

   These options (and others) are not necessarily mutually exclusive, and, depending on the circumstances, a combined approach may be the best. One option may be appropriate for new buildings (and for extensive refurbishing), and another for existing buildings.

3. Having determined how the safe levels can be met, it may be necessary to make legal requirements to ensure they are met. This involves determining:

   - who is to be required to satisfy the standards;
   - how is the requirement to be enforced; and
   - who is to be responsible for enforcement.

   While it may be appropriate to have several regulations directed at achieving the desired result, how a regulation is to be formulated will depend on the answers to these questions.

4. Legal standards can be formulated in various ways. One way of categorising them is as quantitative or qualitative.

5. Quantitative standards. These state what should or should not be present, for example – there should be a bath or shower, there should be a sink with hot and cold water, there should not be dampness, etc.

   - Advantages. They are clear and understandable, both by those who apply them, and by those expected to comply with them, and they can be applied by relatively untrained staff and so are relatively inexpensive to implement.
   - Disadvantages. They can be difficult to update, refine and extend, they tend to be building focussed (what should be provided rather than the reason why).

   Specific, quantitative standards are best suited to new buildings (or conversions, and refurbished buildings).

6. Qualitative standards. These state what can be taken into account, for example – that there should not be any unacceptable threats to health and/or safety, there should be sufficient personal washing facilities, etc.

   - Advantages – Because they are less specific and need to be applied by trained qualified personnel, they are relatively easy to update (the personnel keep themselves updated), they are human (health and safety) focussed.
   - Disadvantages – They are not readily understandable by everyone, and, because they need qualified personnel to apply them, they can be relatively expensive to implement.

   Qualitative standards are appropriate for existing buildings where it is often necessary to adopt a risk assessment approach.

7. Quantitative standards that set limits have a further disadvantage – they tend to become the norm. Those required to satisfy the standard may be reluctant, or not see a need, to do extra, to go beyond meeting that limit.
   There are options to try to overcome this problem:

   - As well as setting a base-line standard, a target standard can be given. The base-line must be met immediately, and the target to be achieved over a period of time.
   - Medium sized and large organisations (companies, landlords, public authorities managing buildings etc.) can be required to devise a plan. Such a plan could include monitoring (continuously or regularly), reviewing, and the adoption and implementation of an improvement scheme. This puts the onus on them (rather than the enforcement authority) to both produce the plan and to implement it. It also encourages them to both improve and to devise ways of improving it. One incentive could be less interference from the enforcing authority, and, if charges are made for enforcement action, the waiving or reduction of charges.

The Academic-Practitioner Partnership

The Academic-Practitioner Partnership (A-PP) is an informal partnership of academics, housing and regeneration practitioners and housing and health researchers. Our focus is on housing and health. We want to see better housing conditions in the United Kingdom. We believe this will bring many other social and economic benefits.

The group was formed in August 2015 when we met to discuss our concern about the lack of attention being given by government to the problem of older housing. Some of us had worked on housing and urban renewal programmes in the 1970s and 1980s when the housing stock was seen by government as a national asset. At that time, the renewal of older housing was a priority supported by all political parties, and an important activity in local government, especially in the larger towns and cities.

In July 2016, we published a paper, *Good Housing: Better Health* which brought together some of the latest evidence about poor housing conditions in the UK. We presented this to the All Party Parliamentary Group for Healthy Homes and Buildings at its meeting in October 2016; and have contributed to subsequent meetings of the Group, including giving oral evidence in November 2017.

Members of the Academic-Practitioner Partnership are

Peter Archer[38] Trustee, founder member and former Chair, Care & Repair England; President, International Federation of Environmental Health

Dr Stephen Battersby MBE Environmental Health and Housing Consultant; Past President, Chartered Institute of Environmental Health

John Bryson Housing, Health and Regeneration Consultant; formerly with Sheffield City Council

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Professor Alan Murie CBE Emeritus Professor of Urban and Regional Studies, University of Birmingham

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