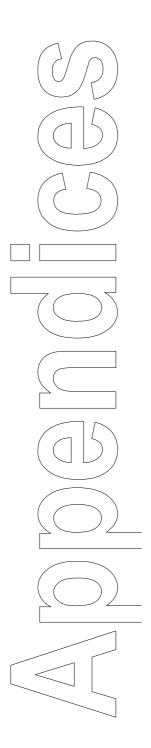
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Executive

Committee

Wed 3rd Feb 2010 7.00 pm

Committee Room 2 Town Hall Redditch



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Executive

3rd February 2010 7.00 pm Committee Room 2 Town Hall

Committee

4.	Local Development Framework - Office Needs Assessment	To endorse the Office Needs Assessment which assesses the need to accommodate office requirements in the Town Centre.			
	(Pages 1 - 78)	(Appendices attached)			
	R Bamford, Acting Head of Planning and Building Control	(Abbey Ward); (Central Ward)			
5.	Water Quality Report	To consider the adoption of a policy in relation to water quality in Council owned and managed buildings.			
	(Pages 79 - 130)				
	S Mullins, Head of Legal,	(Appendices attached)			
	Democratic & Property Services	(No Specific Ward Relevance)			
6.	Private Sector Housing Strategy and Action Plan	To seek approval of the draft Private Sector Housing Strategy and Action Plan.			
	(Pages 131 - 198)	(Appendices attached)			
	Head of Strategy and Partnerships	(All Wards)			



Redditch Town Centre Office Needs Assessment - Final Report

Redditch Borough Council

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APPENDICES

Appendix A - Survey Questionnaire

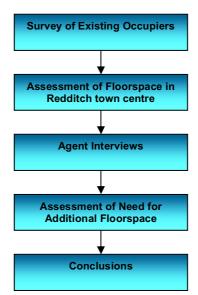
Appendix B - Details of Current Office Provision in Redditch Town Centre

Appendix C - Details of Leasehold / Freehold Sales in Redditch

1. INTRODUCTION

- 1.1 GVA Grimley, in association with GHK Consulting, were appointed in June 2009 by Redditch Borough Council (RBC) to assist them in the preparation of an Office Needs Assessment for Redditch Town Centre, as part of their ongoing Local Development Framework (LDF) process. This report reviews the findings of the work undertaken by RBC, GVA Grimley and GHK Consulting.
- 1.2 This work follows on from the Employment Land Review that RBC prepared in 2008, but examines in more detail, the need for offices within the town centre and reviews potential development sites to accommodate the identified office requirements within the boundary of the town centre and peripheral zone.
- 1.3 This report focuses on four key tasks that have been undertaken as part of this project, and provides conclusions based on the outcomes of the work and our knowledge of the area relating to the offices property market, economic development and regeneration and planning policy issues. The tasks that have been undertaken are detailed in Figure 1.1 below.

Figure 1.1 – Methodology for Office Needs Assessment

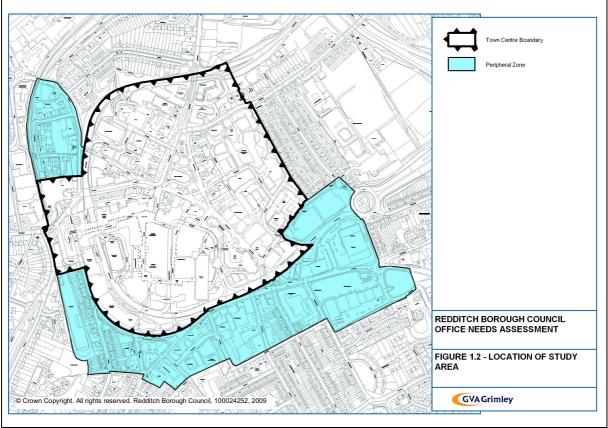


Source: GVA Grimley, 2009

Context of Study Area

1.4 In agreement with the Client, RBC, the Study Area for this project was limited to the town centre (Policy E(TCR).1) and Peripheral Zone (Policy E(TCR).3), both as defined in the Borough of Redditch Local Plan No. 3 Town Centre Inset Map and shown below in Figure 1.2.

Figure 1.2 - Location of Study Area



Source: GVA Grimley, 2009

- 1.5 The rest of this report is structured as follows:
 - Section 2 details the survey of existing occupiers;
 - Section 3 provides an assessment of floorspace in Redditch Town Centre;
 - Section 4 summarises the property market context;
 - Section 5 details the need for additional floorspace; and
 - Section 6 provides our conclusions to the study.

2. SURVEY OF EXISTING OCCUPIERS

Survey Aims and Methodology

- 2.1 This section discusses the survey of existing occupiers of office space in Redditch Town Centre, which was undertaken as part of this study. It sets out the methodology for the telephone survey, provides an analysis of the sample of businesses and a summary of the key survey findings. The aim of the survey was to undertake primary research to collect information about:
 - The characteristics of businesses in the sample including business size, sector, age and activities;
 - Location including reasons for locating in their current premises, satisfaction with the current office accommodation, and reasons for moving where appropriate;
 - Expectations and aspirations including business ambitions, aspirations for growth and any challenges and issues relating to office accommodation; and
 - Plans to relocate and/or expand including, where relevant, reasons for wanting or needing to expand or relocate, likelihood of remaining within Redditch and office requirements in terms of size, location, facilities, etc.
- 2.2 The sample of town centre office occupiers was identified using a number of different sources. The primary source of contact information was the FAME (Financial Analysis Made Easy) database of 3.4 million public and private companies located in the UK and Ireland. FAME is an online database providing basic company details (address, telephone numbers, Standard Industrial Classification SIC codes, etc.) together with up to five years of financial information, derived from Companies House. However, it should be noted that not all information is available for all companies.
- 2.3 A sample of businesses was selected using the post codes that make up Redditch Town Centre and supplemented using a number of online local business directories, as well as the websites of some individual businesses where it was necessary to obtain contact information missing from the other sources.
- 2.4 These various searches produced a total population of 442 different businesses located in Redditch Town Centre. Excluding those businesses unlikely to be occupiers of office space (i.e. retailers, hotels, restaurants, etc.) and those missing key contact details reduced the

potential sample to 195 businesses considered likely to be occupying office space in Redditch Town Centre.

2.5 The table below shows how these 195 office-based businesses are distributed between sectors. It also shows the sectoral distribution of the 35 businesses in the final interview sample, which were selected to be representative of the wider sample in terms of sector, business size and location within Redditch Town Centre, where this information was available. Unsurprisingly the data suggest a strong concentration of businesses involved in financial, professional and other business services, accounting for approximately two-thirds of the office occupiers in Redditch Town Centre.

Table 2.1 - Sample Characteristics by Sector

	Total Sample		Survey Sample	
	Number	%	Number	%
Construction	5	3%	1	3%
Retail	6	3%	1	3%
Transport and Communications	15	8%	2	6%
Financial Services	27	14%	5	14%
Professional Services	36	18%	6	17%
Other Business Services	68	35%	12	34%
Public Administration	3	2%	1	3%
Education	3	2%	1	3%
Health and Social Work	17	9%	3	9%
Other Services	15	8%	3	9%
TOTAL	195	100%	35	100%

Source: RBC Survey of Office Occupiers, 2009

Survey Sample

- 2.6 Redditch Borough Council developed the questionnaire and then undertook telephone interviews with the sample of office-based businesses. A copy of the questionnaire used is shown at Appendix A. In most cases, interviews were undertaken with the 35 businesses selected in the sample. Where this was not possible a replacement business with similar characteristics was selected from the wider population, such that the sample remained representative. In total, 32 interviews were undertaken, representing 16.4% of the wider population.
- 2.7 The businesses ranged from micro businesses employing one or two people, to larger SMEs employing more than 100 people. The average office-based business employed just over 13 employees or 11.5 full time equivalent (FTE) jobs, although more than 60% of the businesses employed fewer than ten people.

2.8 The interview sample included a wide range of businesses in terms of the year they were established, ranging from those established for less than one year to those in operation for more than 150 years (see Figure 2.1 below). Approximately half of the sample comprised relatively new businesses established since 2000, while a large proportion of the businesses first launched in the 1980s.

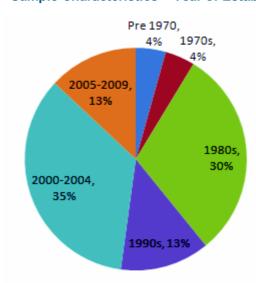


Figure 2.1 - Sample Characteristics - Year of Establishment

Source: RBC Survey of Office Occupiers, 2009

2.9 The survey results showed that just over half of the businesses interviewed had their head office located outside Redditch town centre, showing that Redditch is seen by many businesses to be a sub-regional / local location, rather than a regional centre (the sample included a range of locations and buildings within Redditch town centre with the vast majority located in Church Green East / West, Ipsley Street, Unicorn Hill / Parade, Prospect Hill, Market Place, Evesham Walk, Alcester Street, Arrow Road North, Ludlow Road and Kingfisher Business Park). The sectoral distribution of the interviewed businesses closely matched the characteristics presented in Table 2.1 above. The only difference, as a result of the final sample including 32 rather than 35 businesses, was a smaller number of interviews undertaken with businesses in the health and social work and other services sectors.

Analysis of Survey Findings

2.10 The businesses were asked why they had chosen to locate in their current office accommodation. Perhaps unsurprisingly, by far the most common factor was the "town centre location", for 22 of the 32 businesses (69%). Another two businesses listed the high customer footfall as a key reason, which is also linked to a town centre location. Three other businesses

also gave locational factors, stating the quiet, private and good location of their respective offices. In fact, very few businesses mentioned anything to do with the characteristics of the accommodation itself, their lease or contractual terms. Four businesses did mention the large space offered by their current offices, two mentioned the cheap rent, while another two pay no rent as they own their premises. Finally, there were three businesses that were less positive about their accommodation, claiming that they were only in their current premises because it was the only property available.

- 2.11 The majority of businesses appeared to be satisfied with their current accommodation. The positive aspects of their current premises were broadly similar to the comments made above and were more focused on locational factors. The most common factor, mentioned by eight businesses (25% of the sample) was again the town centre location, followed by the high customer footfall (stated by six businesses, 19% of the sample). Another three businesses simply suggested that their premises were in a good location, while proximity to other businesses was a key positive factor for two businesses. Other factors included: spacious premises (for five businesses); being able to expand (two businesses); cheap rent (three businesses); having car parking (two businesses); and modern premises (one businesse).
- 2.12 However, most of the businesses were also able to describe negative factors with their premises and only five businesses (16% of the sample) could not think of anything negative with their current accommodation. The most common negative factor was a lack of (free) car parking and this was mentioned by 13 businesses (41% of the sample). A lack of internal space and inability to expand was a key issue for five of the businesses (16%), while another three businesses felt their offices needed refurbishment. Other internal issues included a lack of disabled access (a key issue for two businesses), and lack of air conditioning (one business). As mentioned above, most businesses were satisfied with the physical location of their offices. However, it was also a negative factor for others as four businesses felt their premises were too remote and/or had very low footfall. Three businesses were frustrated by noise pollution from neighbouring businesses and / or litter, while another two businesses mentioned vandalism had been an issue for their premises.
- 2.13 Only four of the interviewed businesses (12.5% of the sample) had moved premises within the last three years. Two of these businesses had relocated to make cost savings, in one case by securing new office premises with a lower rent, while the other (micro business) had moved out of a town centre office and had begun working from home. Another business had moved to a different floor in the same building in order to gain more space, having outgrown its previous accommodation. The other business, a consultancy, had actually moved away from

Redditch in order to secure cheaper, more flexible and serviced office accommodation in Stourbridge.

- 2.14 Given the timing of the survey in July and August 2009, in the midst of the current economic downturn it is unsurprising that the most common ambition for the businesses was simply to survive the recession. This was cited as the main ambition for more than half of the sample (17 businesses). Two other businesses stated that they wanted to become self-sufficient and remain profitable. However, the remainder of the sample was more positive with 11 businesses (34%) aiming to expand and grow their business, while nine businesses (28%) wanted to increase profits.
- 2.15 The sample was also asked about their growth aspirations over the next five years. The businesses appeared much more confident when taking a longer term view, and 27 of the businesses (84% of the sample) intend to grow, expand or enhance their business, product ranges, customer bases, etc. over the next five years. Nine businesses (28%) also aim to become more profitable. Relocation plans were also mentioned as aspirations for four of the businesses (12.5%).
- 2.16 Two of these businesses aim to relocate to other office premises within Redditch, although this was still very much aspirational as neither business suggested this was a current plan or had given any thought to the size of premises or types of facilities they would require. One of the larger businesses in the sample reported plans to move to Alcester to secure more modern offices and better parking when the current lease expires in 2011, although it also plans to maintain a presence in Redditch Town Centre. Another business has plans to either extend its premises or relocate to larger offices but remains undecided whether to stay in Redditch or move elsewhere. These types of decisions are key factors that will impact on the town centre moving forward. As well as larger offices of between 1,000 and 5,000 sq ft (100-500 sq m), the business would also like on-site parking. Finally, another business, a dental practice, has plans for a small extension (less than 1,000 sq ft / 100 sq m) to their current premises in Redditch to provide space for an additional dental surgery.
- 2.17 The sample was also asked about the key aspects that they consider essential when relocating to new offices and the findings are presented in Table 2.2 below.

Table 2.2 - Sample Characteristics for Relocating

Which of the following aspects do you consider to be essential when relocating?	Number of Businesses	% of Sample
Flexible modular units that can be adapted or expanded to meet changing requirements	22	69%
Land to construct purpose built facilities to own requirements	0	0%
Affordable rent	30	94%
Location accessible to main transport routes	20	63%
Location close to sources of employees	7	22%
Other	0	0%

Source: RBC Survey of Office Occupiers, 2009

2.18 All bar two of the businesses interviewed (94% of the sample) consider an affordable rent to be essential when relocating, making rent the single most important factor amongst this sample. Flexible modular units that can be adapted or expanded to meet changing requirements were also popular, as was having a location accessible to major transport routes. In both cases, approximately two-thirds of the sample considers these to be essential factors in choosing an office location. Of much lower importance was having a location close to sources of employees. This was only an important factor for 22% of the interview sample, which is somewhat lower than might have been expected given the town centre location of all of these businesses. Finally, none of the interviewed businesses had any interest in securing land on which to construct their own purpose-built facilities.

Key Findings

- 2.19 This section has highlighted the following key points in relation to current occupiers of office space in Redditch town centre and the Peripheral Zone:
 - Redditch town centre experienced a boom of new businesses being established between
 2000 2004, and hence demand for space was high, however this level of entrepreneurial activity has reduced significantly in the last 3-4 years;
 - More than half of the businesses interviewed were not the main office for that particular company, indicating that businesses see Redditch more as a sub-regional / local location, rather than a regional one;
 - The majority of businesses noted that being located within a town centre was important in terms of the additional footfall generated and the range of services available, indicating that Redditch is an attractive location for certain types of businesses;
 - The current available stock in the town centre is perceived to be of a poor standard by a significant proportion of the survey, indicating that investment needs to be made in the quality of office product being offered within the town centre in order to attract new businesses. There is also a perceived lack of car parking in the town centre; and

The survey identified flexible lease terms and affordable rent are two of the key aspects to consider when re-locating. The provision of additional, competitively priced accommodation within the town centre and peripheral zone would be an important factor in attracting new businesses.

2.20 The next section provides an assessment of office floorspace within Redditch town centre.

3. ASSESSMENT OF FLOORSPACE IN REDDITCH TOWN CENTRE

3.1 This section details our assessment of office floorspace in Redditch Town Centre, which we have undertaken in order to provide the baseline context for the study area. We have focussed on the current quantum and type of provision of offices in the study area, any proposed developments in the pipeline and looked at trends of office lettings / sales in the town centre and peripheral zone.

Current Provision

3.2 RBC have carried out an assessment of the current total provision of office floorspace in the town centre and peripheral zone. The information, which was taken from the Valuation Office Agency (VOA) shows that total provision at July 2009 was around 27,000 sq m, with 25,000 sq m within the town centre boundary and the remainder in the peripheral zone, as shown in Table 3.1 below. A more detailed breakdown of current office provision is shown at Appendix B.

Table 3.1 - Current Office Provision in the Study Area

	Current Provision		
Area	sq m	sq ft	
Town Centre	25,214	271,400	
Peripheral Zone	2,144	23,074	
Total	27,358	294,474	

Source: VOA, July 2009 and GVA Grimley analysis

3.3 The split of floorspace shows that the town centre is the dominant location for office uses, whilst the role of the peripheral zone for accommodating offices is, at present, more limited. This is in line with what we would expect, with the majority of office users in the study area being located within the town centre.

Type of Provision

3.4 The type of office provision within the Study area can be viewed in terms of its location, size of office units, its current use, and market type (freehold / leasehold).

Location of Offices

3.5 The town centre has five main locations for offices, these being the Town Hall, Threadneedle House, St Stephen's House, Grosvenor House and the Bromsgrove and Redditch Primary Care Trust Building, as shown in Figure 3.1 below. The remaining supply of offices is located throughout the study area, and mainly located above retail units, or in small ground floor office suites (such as estate agents). Figure 3.1 below shows the distribution of office floorspace in the study area, which has been compiled using postcode data from the VOA.

Giosvenor House

2.500

2.500

7 Oran Cettre Boundary

Peripheral Zone

REDDITCH BOROUGH COUNCIL OFFICE NEEDS ASSESSMENT

FIGURE 3.1 - LOCATION OF OFFICE FLOORSPACE IN THE STUDY AREA

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Figure 3.1 - Location of Office Floorspace in the Study Area

Source: VOA, 2009 and GVA Grimley analysis

Size of Offices

3.6 Analysis of data at Appendix B indicates that the bulk of office units in the town centre are relatively small in size. Of the 119 offices identified, 55 offices were less than 100 sq m, 89 were under 200 sq m and only four were over 1000 sq m (although this does not include suites within Grosvenor House whose total floorspace is in excess of 3,000 sq m). This

analysis indicates that the majority of Redditch's current provision of office accommodation is rather limited to smaller office units based mainly above retail units or within larger buildings.

Current Use

3.7 The breakdown of users within the town centre and peripheral zone indicates that the predominant users of office space in the town centre are private rather than public users, indicating a potential for private sector investment within the study area, although at present this would appear to be limited.

Leasehold / Freehold Opportunities

3.8 Analysis of the data also indicates that 31 of the offices were to let / for sale or contained units within them that were to let. This amounted to around 7,600 sq m of vacant office space, or 28% of the total stock. This would suggest a relatively high number of opportunities within the town centre, which may indicate that the office space on offer is not appealing to the current market. However caution has to be applied to any conclusions, given the impact of the current recession in the UK economy on the market place, which may be a factor behind such a high vacancy level. In comparison, vacancy levels within Redditch have consistently been between 9-12% from 1998-2005¹, therefore the current levels being experienced are the highest in over a decade.

Development Commitments

3.9 An extensive search by RBC revealed that at present there are no pipeline office developments within the Study Area, with the exception of NEW College campus in an existing unit (Osprey House, Albert Street).

Trends

3.10 Details of recent office lettings and sales (January 2000 – March 2009) for Redditch Borough (this information was not available at the study area level) was provided to the consultant team by RBC. This information is shown at Appendix C has been analysed for both leasehold and freehold sales in more detail below.

¹ 'Estimated Vacancy Rate: Local Authority Districts', Communities and Local Government (CLG)

Leasehold

3.11 The number of office units let within the Borough saw a sharp increase from 2004 onwards, with a peak in 2005 / 06, just before the onset of the current economic downturn. Since then, lettings have remained above the level seen in the period 2000 – 2003, but have dropped, presumably as a result of the slump in the office market, which is reflective of national and regional trends. Office lettings in the first quarter of 2009 appear to have been strong; therefore it will be necessary to monitor this position closely as part of ongoing work by the Council.

Table 3.2 - Total Office Lettings in Redditch Borough (Jan 2000 - Mar 2009)

Year	Number of Units Let
2000	17
2001	19
2002	8
2003	14
2004	29
2005	37
2006	37
2007	30
2008	26
2009 ²	11

Source: RBC and GVA Grimley analysis, 2009

3.12 The total floorspace let over the period shows a gradual increase in terms of the trend, shown in Figure 3.2 below. This data shows the relative slump in the period 2002 – 2004, then a significant rise in office lettings from 2004. The average take up of office space in Redditch has been around 3,800 sq m per annum. In comparison, average take up of office space in Wyre Forest is around 1,100 sq m per annum and around 4,400 sq m per annum in Bromsgrove over the same period³.

 $^{^2}$ Figures for 2009 are for $1^{st}\, Jan - 31^{st}\, March$ only

³ Figures taken from FOCUS, October 2009

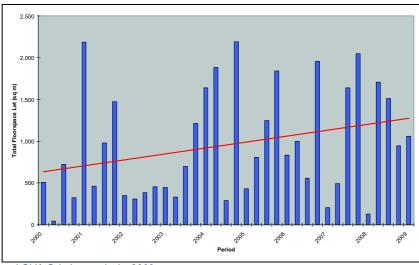
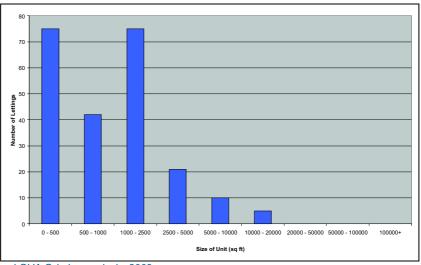


Figure 3.2 – Total Office Floorspace Lettings in Redditch Borough (Jan 2000 - Mar 2009)

Source: RBC and GVA Grimley analysis, 2009

3.13 Over the last eight years, the majority of rented offices have been small units, with around 84% of all lettings being for units of less than 232 sq m (2,500 sq ft). In addition, there have only been five instances of a unit of greater than 929 sq m (10,000 sq ft) being let. A possible reason for this is that Redditch is seen as an attractive market for small to medium sized businesses, which may be due to a number of factors including range of properties available, location, accessibility, environment and services. A summary of lettings by unit size is shown in Figure 3.3 below.





Source: RBC and GVA Grimley analysis, 2009

Freehold Sales

3.14 Analysis of the data from RBC relating to sales of office units shown at Appendix C reveals that there have been limited freehold sales in Redditch in the last eight years. In total there have been 20 sales occurring over the period, equivalent to around 2.5 sales per annum, amounting in total to around 9,230 sq m (100,000 sq ft). The unit size analysis of office sales shows that around half of all sales are for smaller units (less than 232 sq m or 2,500 sq ft). Again, this reflects the nature of the property market in Redditch that it has been unable to attract large occupiers. This could be for a number of reasons including range of properties available, location, accessibility, environment and services.

3.15 This section has shown that:

- Provision of offices in the study area totals around 27,000 sq m (290,000 sq ft), with the vast majority of these located within the town centre boundary;
- The majority of offices are small in size, and therefore mainly attractive to local office occupiers. The main users of offices within the study area fall within the financial, professional and other business services;
- There are a relatively high number of properties to let within the study, indicating that the current provision may not meet potential occupiers requirements;
- There are no office development pipeline developments at present, which may be indicative of both the current downturn in the UK economy and limited demand for office space in the study area; and
- The lettings market has remained consistent throughout the last three years, although the majority of deals are for small office units (less than 232 sq m (2,500 sq ft)).
- 3.16 The next section of this report summarises our in-depth analysis of the office property market in the study area.

4. PROPERTY MARKET REVIEW

4.1 This section provides an analysis of the office property market within Redditch Town Centre.

We have drawn upon evidence from local agent interviews, our own property market knowledge and websites such as the Worcestershire Hub and FOCUS.

Occupational Market Overview

Demand

- 4.2 Demand from occupiers in Redditch Town Centre has remained relatively static in the last decade. Typically, demand derives from local professional and service business seeking to either expand or replace their office accommodation. Lease events (such as lease expiry or break clauses) and / or the need to improve working environments are often key drivers of occupier requirements in the town centre. There are few transactions above 323 sq m (3,500 sq ft), which provides a further indication that demand in the town centre mainly derives from local occupiers.
- 4.3 In contrast, national and international corporate occupiers, such as Orange, IMI and Fujitsu, often favour business park locations, particularly further east of Redditch along the M42 corridor between junctions 4 and 6. The most established business parks in this location are Birmingham Business Park and Blythe Valley Park, which provides 195,096 sq m (2.1 million sq ft) of office accommodation in total. These business parks are successful given their connectivity with the motorway network, easy access to Birmingham International Airport and the national rail link from Birmingham International Rail Station.

Supply

As a consequence of the limited demand for new build premises, Redditch Town Centre has witnessed little office development of significance in recent decades. In addition, town centre locations (such as Redditch) are rarely able to provide sites capable of development of the type and style required by larger corporate occupiers (particularly in light of issues which constrain supply, such as site assembly). For these reasons, business parks outside the study area are anticipated to remain the focus for any larger 'footloose' corporate occupiers seeking office premises in the Redditch area.

Recent Transactions

4.5 The following known rental transactions are highlighted below.

Table 4.1 - Recent Office Transactions in Redditch Town Centre

Location	Occupier / Tenant	Area	Rent per sq m (per sq ft)	Transaction date
Grosvenor House, Prospect Hill	Virgin Media	510.14 sq m 6,137 sq ft	(hour off re)	July 2009
Quadrant Site, Alcester Street	Unknown	246 sq m 2,643 sq ft	(£11.35 psf)	09 Apr 2009
9 Church Green West Redditch	Unknown	171 sq m 1,840 sq ft	(£10.00 psf)	15 Aug 2008
3 Church Green East Redditch	M&P House	198 sq m 2,126 sq ft	(£6.23 psf)	1 Aug 2008
10 Unicorn Hill Redditch	Unknown	156 sq m 1,680 sq ft	(£6.85 psf)	1 Aug 2008
Empire Court Prospect Hill Redditch	Unknown	323 sq m 3,473 sq ft	(£8.00 psf)	9 Jun 2008
149 Ipsley Street Redditch	Unknown	37 sq m 400 sq ft	(£9.10 psf)	3 Mar 2008
Kingfisher SC, Ringway Redditch	Unknown	220 sq m 2,366 sq ft	(£7.50 psf)	Feb 08
Kingfisher SC, Ringway Redditch	Unknown	178 sq m 1,911 sq ft	(£7.06 - psf)	Oct 07
Kingfisher SC, Ringway Redditch	Unknown	76 sq m 822 sq ft	(£7.50 psf)	Aug 07
Crown Mews Church Green West Redditch	Unknown	91 sq m 979 sq ft	(£7.66 psf)	21 Dec 2007
St Stephens Court 11 Church Green East Redditch	Unknown	92 sq m 995 sq ft	(£11.81 psf)	1 Dec 2007
1-9 Unicorn Hill Redditch	Unknown	300 sq m 3,229 sq ft	(£8.50 psf)	1 Dec 2007

Source: GVA Grimley, 2009

Rental Values

4.6 There is no 'grade A' (prime, well maintained buildings with large column free floor-plates and high ceilings) office stock in Redditch Town Centre. There is a significant amount of 'second

- hand' office stock in Redditch of varying degrees of specification and quality, which potential occupiers regard as being of 'secondary' quality (secondary stock, some second hand, and usually of poorer quality compared to primary stock).
- 4.7 Office stock in good condition and higher specification / quality has tended to attract headline rental values in the order of £107.64 £150.70 psm (£10.00 £14.00 psf). Where smaller floor plates⁴ are provided (92 sq m (1,000 sq ft) and below), a similar rental value may also apply.
- 4.8 In comparison, GVA Grimley research indicates that prime office rents in larger competing town / city centres as at June 2009 are as follows.

Table 4.2 – Comparison of Prime Office Rents within Comparable Centres

Town / City	Headline rent (per sq m)	Headline rent (per sq ft)
Redditch	£107.64	£10
Bromsgrove	£96.88 - £107.64	£9 - £10
Worcester	£129.17	£12
Solihull	£215.28	£20
Coventry	£182.98	£17
Birmingham	£306.77	£28.50

Source: FOCUS and GVA Grimley Research analysis, 2009

- 4.9 The above shows that headline rental values in Redditch Town Centre are broadly similar to neighbouring centres such as Bromsgrove and Worcester, but are significantly below other larger competing centres such as Solihull, Coventry and Birmingham.
- 4.10 Office accommodation of lower specification, quality, and condition typically seeks headline rental values in the order of £64.58 to £107.64 psm (£6.00 to £10 psf). The wide range in rental values reflects the varying degrees of specification and quality that the town centre currently provides, and the flexibility of lease terms agreed. Where large office accommodation is provided, the rent is likely to reduce, reflecting the market's limited appetite for larger office floor plates.

Prevailing Conditions

4.11 The prevailing economic conditions have had a detrimental effect on economic activity and hence the demand for office premises across the UK. Typically, office accommodation now takes longer to let, with extended void / marketing periods now evident. Changes to Empty Rates relief liability and the introduction of Energy Performance Certificates (EPCs) have

added an additional burden on landlords marketing vacant premises. These factors have prompted many landlords to increase rental incentives (such as rent free periods, reverse premiums and more flexible lease agreements). Whilst these factors increase the attractiveness of units to potential occupiers, they all reduce the 'net effective' rent that the landlord will receive (after allowing for rental incentives).

4.12 Redditch Town Centre study area has been no exception to the conditions experienced in the wider office markets, and hence a downwards pressure on rental values in the town centre is likely. In a number of cases, landlords in the out of town market have reduced quoting rents by 15 – 25%, due to the quantum of competing office schemes. This is in addition to offering market rent incentives, such as 12 to 24 months rent free on a five year lease term. In the case of sub-lettings, the rent free period may equate to half of the rent remaining over the remaining unexpired term of the lease. This indicates that sub leases are proving particularly difficult to assign to potential occupiers.

Availability

4.13 In view of the relatively muted occupational demand, the type and quality of office stock in Redditch and wider economic conditions, there is no shortage of available office space in the town centre study area. The following table highlights available office premises in the study area as at August 2009.

Table 4.3 - Availability of Office Space within Redditch Town Centre

Location	Total Area Available	Quoting Rent	Lease notes
Duncombe House	204 sq m	£83.27 psm	A new lease for a term
	(2,191 sq ft)	(£7.74 psf)	to be agreed.
St Stephens House,	1,349 sq m	£96.44 psm	A new lease on terms
Easmore Rd	(14,516 sq ft)	(£8.96 psf)	to be agreed.
St Stephens House,	466 sq m	£85.85 psm	A sublease with terms
Evesham St	(5,016 sq ft)	(£7.98 psf)	to be negotiated is available.
St Stephen's House,	184 sq m	£97.95 psm	Available to let on a
Evesham Walk	(1,978 sq ft)	(£9.10 psf)	formal business lease
Canon Newton House	102 sq m	£97.95 psm	
	(1,096 sq ft)	(£9.10 psf)	
Oswold House	121 sq m	n/a	n/a
	(1,307 sq ft)		

⁴ The net ground floor area of a building

Location	Total Area Available	Quoting Rent	Lease notes
Empire Court	114 sq m	£53.82 psm	
	(1,232 sq ft)	(£5.00 psf)	
Crown Mews	26 sq m (280 sq ft)	£274.47 psm (£42.50 psf)	
Grosvenor House	1,819 sq m (19,578 sq ft)	Not quoting	
Grosvenor House	398 sq m	£104.94 psm	
	(4,285 sq ft)	(£9.75 psf)	
Grosvenor House	162 sq m	£102.25 psm	
	(1,742 sq ft)	(£9.5 psf)	
20 Unicorn Hill			
	(2,150 sq ft)	(£11.63 psf)	
20a Unicorn Hill	73 sq m (782 sq ft)	£68.82 psm (£6.39 psf)	
Prospect House	1,858 sq m (20,000 sq ft)	£147.89 psm (£13.74 psf)	Current lease to BT with four years unexpired. Prospect House lies just outside the study area, but is a significant competitor.

Source: FOCUS and GVA Grimley analysis, 2009

4.14 The above highlights that there are circa 5,240 sq m (56,406 sq ft) of office accommodation being marketed in the study area as at July 2009 (excluding nearby Prospect House). Interestingly, circa 1,998 sq m (21,510 sq ft) of available floorspace is within St Stephen's House, and 2,379 sq m (25,606 sq ft) is available in Grosvenor House. Availability in these two buildings is significant, accounting for circa 84% of the total available office stock in Redditch. There is a significant quantum of office floorspace comprising 1,858 sq m (20,000 sq ft) available across two floors in Prospect House. Although it lies just to the north east of the study area, Prospect House is a significant competitor to the study area.

Vacancy

4.15 Information provided by Redditch Borough Council (sourced from the Valuation Office Agency) suggests that the total office stock in the study area is 27,358 sq m (294,474 sq ft). According to 'Estimated Vacancy Rate: Local Authority Districts' published by Communities and Local Government (CLG), the vacancy rate of all commercial premises (offices, industrial and retail) in Redditch between 1998-2005 ranged from 9-12%, slightly above the West Midlands average of 7-11%.

- 4.16 However, the above analysis of available floorspace (at 3.8) suggests an office vacancy rate of approximately 28% when compared with the total quantum of office stock (27,358 sq m, / 294,474 sq ft) in Redditch. This is significantly above both West Midlands and Redditch average vacancy rates (as at 2005).
- 4.17 Our assessment of the office property market in Redditch Town Centre has shown that:
 - Demand for offices is largely derived from churn existing local occupiers who are looking for new premises in the town centre;
 - The profile of occupiers is that of small local companies, who typically have requirements of less than 323 sq m (3,500 sq ft);
 - There has been little office development in the town centre in recent years, meaning that existing stock is often not to the needs of modern, large footloose companies;
 - Headline rents in Redditch are often lower than those seen in comparator towns and cities such as Worcester, Solihull and Birmingham;
 - Vacancy in the town centre is presently as high as it has been for over a decade (28%),
 largely due to the impact of the downturn in the UK economy; and
 - The downturn in demand has had a similar effect on competitor sites outside the Study Area, such as Prospect House.
- 4.18 The next section of this report reviews the need for additional floorspace within the study area.

5. NEED FOR ADDITIONAL FLOORSPACE

Occupier Location Selection Criteria

- 5.1 In considering the attractiveness of the town centre, factors other than supply and demand must be considered. Occupier requirements for office space are becoming more sophisticated in terms of the accessibility, efficiency and sustainability of buildings and locations. This consequently impacts on the location and specification of new office development. Influences on office location decision making are made up of the following considerations:
 - Good transportation links;
 - Access to qualified labour;
 - Parking;
 - Cost of accommodation;
 - A quality environment (including access to a range of services);
 - The right type of available space in terms of quality and floorplate; and
 - Image.
- The cost and type of accommodation have already been addressed above. In respect of **good transport links**, whilst it is acknowledged that a number of towns and cities in the UK have experienced an occupier shift towards town centre locations away from business parks for reasons of sustainability, transport links and supporting amenities, (and this could be a feature of Redditch Town Centre), many of the existing business park occupiers in Redditch have historically favoured the accessibility offered by the M42 corridor. There will always remain a group of users, dependent on the extent to which they need mobility, which will need to be located near to the highway network (A roads and motorway junctions), with areas of plentiful car parking. In this regard, we feel that Redditch town centre offers a reasonable location, in that it has good accessibility to the local and national highway networks, although we feel that the lack of car parking within office developments would be a perceived weakness of the town centre. In contrast, there are users such as financial and business services which prefer to locate within centres.
- 5.3 At present, the main ways in which the requirements of town / city centre and out-of town users differ is that out-of-town users attach greater importance to on-site car parking, security

and motorway accessibility, while town / city centre occupiers may require a high-profile location and attach more importance to proximity to public transport nodes and access to amenities. The convenient location of the train station in Redditch is anticipated to be an advantage to potential occupiers of the town centre, and we would recommend that key locations adjacent or in close proximity to the train station are given priority for development, and that these areas are redeveloped in the short term. The desire for large amounts of **car parking** is now balanced by recognition of the importance of general accessibility by all modes of travel. Increasingly influential is the 'green' agenda on both the future of buildings (including eco-friendly buildings) and on a corporate focus on increasing sustainability.

- Access to qualified labour is a particular issue for the town centre. Whilst there is a good supply of labour, the skills profile of Redditch is not well related to the needs of the professional and financial services sector. This profile shows that Redditch has lower than average numbers of people who are qualified to NVQ Levels 3 and 4 and above⁵. Experience suggests that typically, this sector remains strongly focused upon centres where a premium is placed upon attracting employees and an interaction and trading with clients and other firms in the sector.
- 5.5 Redditch has a long standing low wage economy which flows from higher than average unemployment and high rates of unavailability for work and the recession is compounding these problems. Skill levels in Redditch are lower than the regional and national averages and the poor combination of labour market and skills points to a low score for competitiveness. This situation is exacerbated by a shortage in supply of high end housing and this is regarded as one of the most significant deterrents to businesses locating in the area. With regard to image and environmental considerations, one of the key issues affecting the town centre is the lack of identity in respect of a defined town centre, which means that it is difficult to create a "sense of place".
- 5.6 Given these characteristics, in the current economic climate, external relocations to the area are likely to be limited when combined with marginal growth in existing service industries. This will lead to subdued demand for new central commercial office buildings until confidence in the investor and office markets is restored.
- 5.7 In scoring potential locations in respect of a property relocation strategy, we conclude that Redditch would score favourably in respect of transport communications to and from the Birmingham conurbation, the cost of staff and the cost of occupying office space are relatively cheap compared with the average and this may have a positive impact on attracting inward

investment. Availability of office space in the town centre is currently plentiful, but mostly of secondary quality, and therefore proposals for Grade A space would be required in order to attract new inward investment to the town centre. However, the number of pre-let office transactions in UK region cities recently are extremely limited and therefore, for the town centre to be revitalised and re-branded, we believe that the key issue in providing the basis for successful regeneration of the town centre, lies in assembly key parcels of land (as identified in the emerging Town Centre Strategy) where new development / investment can be targeted and that the Council will have a key role to play in this process.

5.8 Redditch has a relatively low share of private sector service employment, which is a key driver in successful urban economies elsewhere in the UK. Accordingly, we anticipate the target market for Redditch Town Centre could come from the public sector (civil service / local authorities / quangos); low value back office functions for major corporate (utilities etc) and local occupiers seeking to upgrade to higher quality more efficient space.

Anticipated Occupational Demand for Redditch Town Centre

Broad Quantum of Demand

- The West Midlands Regional Spatial Strategy (Preferred Options) (WMRSS) identifies a requirement of around 45,000 sq m of new office floorspace within Redditch Town Centre to 2026. This report has identified that the current provision of office floorspace in the town centre and peripheral zone is around 27,000 sq m therefore the WMRSS target represents a significant increase of around 166%. We see this as a very challenging target more likely unrealistic without significant land assembly / land use change and identification of target markets that have higher levels of demand than current target sectors, particularly drawing upon the evidence relating to demand within sections 3 and 4 of this report. Our analysis has shown that demand for floorspace has come largely from local occupiers, whose requirements are currently limited to smaller office units and can be met by existing requirements, rather than requiring new office space.
- 5.10 The Panel Report for the WMRSS EiP was published in September 2009. Paragraph 5.48 states that 65% of office development should take place within, or on the periphery of, identified strategic centres such as Redditch. Further office development should take place within or on the edge of other centres identified in Core Strategy DPDs, in addition to development on RIS. However, Redditch is the only identified centre in the Borough and would therefore be required to accommodate all of the Borough's allocated office floorspace.

⁵ ONS annual population survey

We would question that this quantum of development could be accommodated within the town centre and peripheral zone. The Panel also recommend that there is no further relaxation on the sequential requirements of the policy, restricting out-of-town development, and meaning that targets set for Redditch Borough are increasingly challenging.

- 5.11 Our analysis shows that take up rates within Redditch over the period January 2000 March 2009 are around 3,800 sq m per annum in terms of lettings. However it should be noted that the majority of this demand has been accommodated within existing, rather than new, office space and that this figure represents office take up for the whole of the Borough, rather than the town centre.
- In assuming a proportion of take up for the town centre, we have looked at the total stock of floorspace within the Borough and compared that with floorspace within the town centre to obtain a view as to the proportions of in-centre and out-of-centre office floorspace within the Borough. The Valuation Office Agency data for 2008 shows that there are around 112,000 sq m (1.2m sq ft) of office floorspace in Redditch, which includes both commercial and non commercial premises. The town centre has approximately 27,000 sq m (290,000 sq ft) of office floorspace, and therefore accounts for around 25% of the office market in the Borough. Applying a pro-rata reduction would imply that take up in the town centre is in the order of 915 sq m (10,000 sq ft) per annum.
- 5.13 It should be borne in mind that of this take up, only a proportion will have been for new stock. The town centre occupier survey indicated that around 13% of the sample of companies had moved within the last three years. Applying this rate of churn to the take up rate could indicate that demand for new office floorspace (i.e. not relocations) could be around 800 sq m (8,600 sq ft) per annum. Projecting this rate of take up forward over the period of the WMRSS would indicate a requirement of 16,000 sq m, around 36% of the WMRSS figure of 45,000 sq m.
- 5.14 The Redditch Employment Land Review (2008), which looked in more detail at the demand for employment land (i.e. outside the town centre) identifies an office requirement of 45,000 sq m to be accommodated on non-employment land locations (e.g. town centres, above shops, people's spare rooms, garages, barn conversions etc), which is based upon the same assumption as the WMRSS EiP Panel Report of 35% of office demand being directed to non-employment land locations. However, it should be borne in mind that the forecasts used for the ELR work in 2008 were created before the onset of the current downturn in the UK economy, and may not reflect the most current situation. The figure of 45,000 sq m would also have included an allowance for office demand which would be located outside of the town

centre (but not on employment land). This would include locations such as units above shops in local centres, people's spare rooms, garages and barn conversions.

- 5.15 This evidence suggests that the WMRSS figure of 45,000 sq m to be located within the town centre is far too high, and therefore an unrealistic target for Redditch to achieve. For the Borough to provide around 45,000 sq m of office space could lead to development being directed outside the town centre, which would be contrary to regional policy, or there being an oversupply of office space, leading to high levels of vacancy. We would therefore suggest that a revised forecast is adopted, based on a combination of take up rates and the original demand forecasts from the ELR. Whilst the latter have been identified as being a little too optimistic, given the current market conditions, they do provide some realism in that they are based on national and local trends, therefore they are a good indicator of the longer term demand within Redditch.
- 5.16 The identified take up within Redditch has shown that the predicted demand for the town centre would be around 16,000 sq m to 2026. The ELR identifies around 45,000 sq m to be accommodated on land not designated as employment land, equivalent to around 35% of the total demand. Assuming that 10% of the total demand was accommodated in "other" non employment land locations, this would leave 25% of the total to be accommodated in the town centre, equivalent to around 33,000 sq m.
- 5.17 This provides a range of office requirements for the town centre of between 16,000sq m to 33,000sq m, based on past take up rates and a detailed economic forecasting model. Assuming a mid point would indicate a requirement of around 24,000 sq m. We feel that this would represent a slightly pessimistic and negative approach, given that there may be inaccuracies in the take up data, and the fact that the demand model was based on a lower housing target (6,600 new homes) compared to the latest figure in the WMRSS EiP Panel Report. We would also suggest that a target should be aspirational and not merely a continuation of what has preceded in the past. We would therefore feel that a more realistic offices target for Redditch town centre would be in the region of 30,000 sq m over the Plan period. The emerging Town Centre Strategy would be key to achieving this target.

Type of Demand

5.18 Demand is likely to be experienced from first and second tier professional services, the former who typically tend to focus on larger towns / cities capable of providing a broad client base and staff with appropriate skill levels. Furthermore, such occupiers typically cluster and favour high profile locations which are rarely cost driven. Second tier professional services typically

seek lower value modern office accommodation, where due to the specialist nature of the services provided, key drivers are not ones of profile or extent of local client base. However, demand from such second tier professional sectors is likely to be restricted and may only account for perhaps up to 30% of the floor area to be provided.

Other occupational demand is likely to derive from the indigenous market and sub-region. This could include smaller professional and business services seeking to upgrade their accommodation and business park occupiers looking for a more sustainable town centre core location with an enhanced amenity offer. We would anticipate that regional business services and back office administrative functions could dominate the town centre market, alongside public sector outsourcing (which is currently driving demand in most towns and cities), existing or regional public sector and contact / shared services although these generally will continue to be grant led. Inward investment at an international level would appear to be highly unlikely for Redditch Town Centre, until it determines what its offer / target markets are and where these could locate in the town centre. The adopted Economic Strategy will be key in identifying what these target markets are.

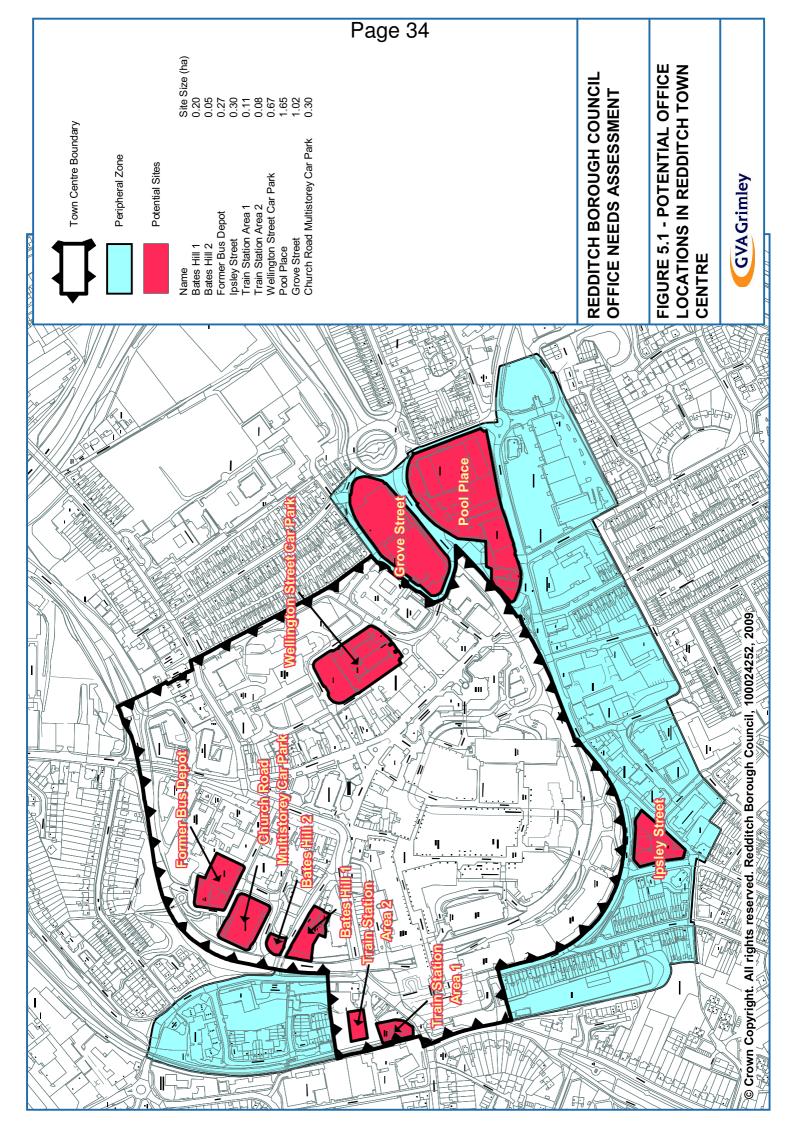
Potential Locations for Future Development

- 5.20 We have identified a number of potential locations for future office development within the study area. These have been identified through site visits and are shown in Figure 5.1 below.
- 5.21 We have undertaken an initial capacity assessment of the sites we have identified, which has shown them to be capable of providing around 21,500 sq m (233,000 sq ft), detailed in Table 5.1 below. For this capacity assessment we have assumed a plot ratio of 40%, 3,000 sq m per net hectare and building heights of between three and five storeys. We have also assumed some mixed use development in keeping with guidance for the town centre as set out in the Local Plan and accompanying documents.

Table 5.1 – Capacity Assessment for Potential Town Centre Sites

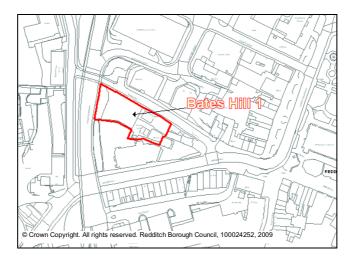
Name	Site Size (ha)	Assumed % for Offices	Potential Floorplate (sq m)	Assumed Storeys	Total Floorspace (sq m)	Total Floorspace (sq ft)
Bates Hill 1	0.20	100%	237	5	1,186	12,768
Bates Hill 2	0.05	100%	61	5	307	3,307
Former Bus Depot	0.31	50%	184	5	920	9,901
Ipsley Street	0.30	100%	358	3	1,074	11,563
Train Station Area 1	0.11	100%	127	3	380	4,088
Train Station Area 2	0.08	100%	101	3	302	3,247
Wellington Street Car Park	0.67	80%	647	5	3,235	34,823
Pool Place	1.65	80%	1,586	5	7,931	85,364
Grove Street	1.02	80%	978	5	4,892	52,659
Church Road Multistorey Car Park	0.30	80%	289	5	1,446	15,562
		•	•	Total	21,673	233,282

Source: GVA Grimley analysis, 2009



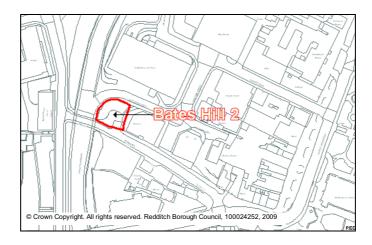
5.22 Below we give our view on each of these potential sites in turn:

Bates Hill 1



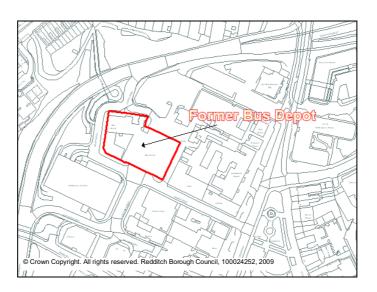
- 5.23 The site is 0.2ha in size and is located off Bates Hill to the north and the Redditch Ringway to the west. It is in close proximity to both the railway and bus stations via Windsor Street as well as the main shopping area of the town centre via Unicorn Hill.
- 5.24 The site consists of an area of incidental open space and derelict shop units. Immediately adjacent to the site are a number of shop units on the ground floor with offices above and the Chicago Rock Café. Located on the opposite side of Bates Hill are a Doctor's Surgery and a Health Centre.
- 5.25 The site falls within Town Centre (Policy E(TCR).1) and the Northwest Quadrant (Policy E(TCR).6) which are identified on the Local Plan Town Centre Inset Map (2006). The Redditch Ringway is a designated district distributor (Policy C(T).2) road. The Church Road Town Centre Supplementary Planning Document (2007) identifies that the buildings within this site would benefit from redevelopment. The remainder of the site adjoining the Redditch Ringway is identified as being suitable for a new building of five storeys in height. Our view is that this site would be suitable for redevelopment as offices.

Bates Hill 2



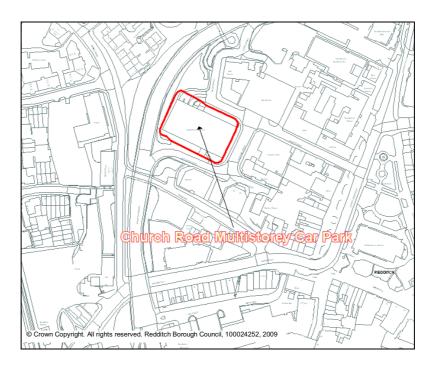
- 5.26 This site is 0.05ha in size and is located adjacent to the recently constructed Doctor's Surgery on Bates Hill and is currently unused. An elevated section of the Redditch Ringway lies immediately adjacent to the west of the site. Access to the site is currently via Bates Hill, which in turn links to Windsor Street providing easy access to the train station area. The main shopping area is also easily accessed via Unicorn Hill.
- 5.27 The site falls within the Town Centre (Policy E(TCR).1) and the Northwest Quadrant (Policy E(TCR).6) which are identified on the Local Plan Town Centre Inset Map (2006). The Redditch Ringway is a designated district distributor (Policy C(T).2) road. Our view is that this site would be suitable for a small scale office development.

Former Bus Depot



- 5.28 The Former Bus Depot site is 0.27ha in size. It is located off Church Road and consists of the former bus depot (which is now derelict) with a small car park to the rear. There is a nightclub adjacent and a large multi-storey car park situated on the opposite side of Church Road. The town centre is easily accessible via Church Green West and from here the railway station can be accessed via Unicorn Hill.
- The site falls within the Town Centre (Policy E(TCR).1) and the Northwest Quadrant (Policy E(TCR).6) which are identified on the Local Plan Town Centre Inset Map (2006). The Redditch Ringway is a designated district distributor (Policy C(T).2) road. The Church Road Town Centre Supplementary Planning Document (2007) identifies that the larger building within this site would benefit from redevelopment, whilst the smaller building fronting Church Road should be kept because of its 'streetscene group value'. Much of the site adjoining is identified as being suitable for mixed use development with buildings of four and five storeys in height. In line with the recommendations in the emerging Town Centre Strategy we have assumed that this site would be suitable for mixed use development including offices and have assumed a mix including 50% for offices, allowing for more active uses on the ground floor, such as retail, which would be local in nature and to serve the development, rather than being in competition with the primary retail outlets located in the town centre.

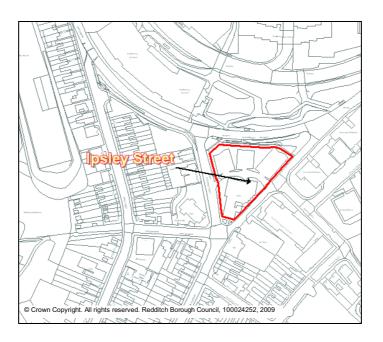
Church Road Multi-Storey Car Park



5.30 This site is located on Church Road and is bounded by Adelaide Street to the east and south and the Redditch Ringway to the west. The site is 0.3ha in size and consists of a multi-storey

- car park. Surrounding uses include the former Bus Depot, Doctors Surgery, Health Centre and a nightclub.
- 5.31 The town centre is easily accessible via Church Green West and from here the railway station can be accessed via Unicorn Hill.
- 5.32 The site falls within Town Centre (Policy E(TCR).1) and the Northwest Quadrant (Policy E(TCR).6) which are identified on the Local Plan Town Centre Inset Map (2006). The Redditch Ringway is a designated district distributor road. The Church Road Town Centre Supplementary Planning Document (2007) identifies that the site would benefit from redevelopment. The remainder of the site adjoining the Redditch Ringway is identified as being suitable for a new building of four and five storeys in height. The Redditch Town Centre Strategy (2009) states that there is a need to review the demand for car parking in the town centre to determine whether or not it is required.

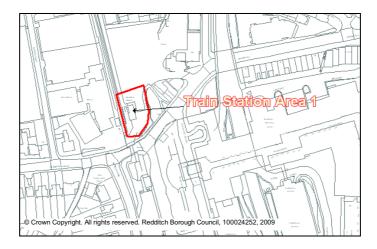
Ipsley Street



- 5.33 The site at Ipsley Street is bounded by Evesham Street to the west, Station Way to the north and Ipsley Street to the east. Both the bus and railway stations are accessible via Station Way. The main shopping area of the town centre is not as easily accessible as Station Way runs parallel with Redditch Ringway, which acts as a barrier to the town.
- 5.34 The site is 0.3ha in size and consists of a nightclub and a car park is currently underused.

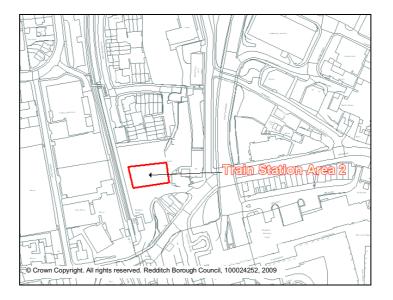
5.35 The site falls within the Peripheral Zone (Policy E(TCR).3) which is identified on the Local Plan Town Centre Inset Map (2006). A local distributor road (Policy C(T).2) borders the east and west boundaries of the site and a public transport route – buses and emergency vehicles only (Policy C(T).7) road borders the north of the site. The Redditch Town Centre Strategy (2009) states that there is a need to review the demand for car parking in the town centre to determine whether or not it is required. Due to its location in the peripheral zone, we have assumed that this site would be developed as a single use for offices, but at three storeys in keeping with building heights in the vicinity of the site.

Train Station Area 1



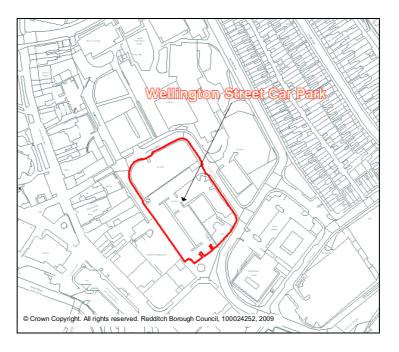
- 5.36 This site is 0.11ha in size and consists of the current Redditch Railway Station building and part of the car park. The railway line runs along the western boundary of the site and Windsor Road runs along the south. This road is elevated and there is a subway running under the road to the station. The entrance of the subway is included in the site.
- 5.37 The bus station is easily accessible from the site via the subway and the main shopping area of the town centre is easily accessed via links through the bus station.
- 5.38 The site falls within the Town Centre (Policy E(TCR).1) which is identified on the Local Plan Town Centre Inset Map (2006). The Redditch Town Centre Strategy (2009) identifies proposals to redevelop the train station area and commercial / office uses in this area are supported by the Strategy.

Train Station Area 2



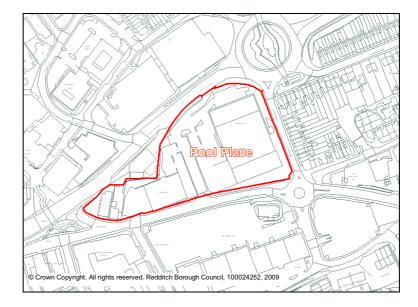
- 5.39 This site is 0.08ha in size and consists of the car park serving the current Redditch Railway Station. The railway line runs to the west of the site and Windsor Road runs to the south. This road is elevated and there is a subway running under the road to the station.
- 5.40 The bus station is easily accessible from the site via the subway and the main shopping area of the town centre is easily accessed via links through the bus station.
- 5.41 The site falls within the Town Centre (Policy E(TCR).1) which is identified on the Local Plan Town Centre Inset Map (2006). The site is identified an existing transport interchange. The Redditch Town Centre Strategy (2009) identifies proposals to redevelop this part of the train station area for a mix of uses including commercial and residential. This may present a conflict with the Strategy as any development at this site may be required to include residential uses, therefore more detailed work may need to be undertaken relating to the development viability of this site.

Wellington Street Car Park



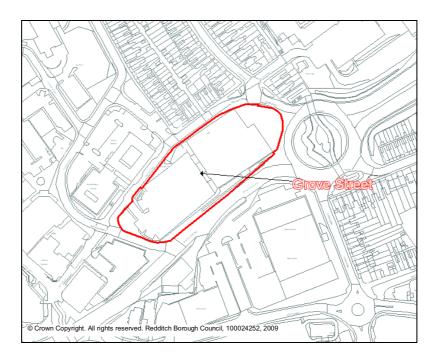
- 5.42 Wellington Street Car Park is 0.67ha in size. It is a surface car park with a small public house in the south east corner. The site is bounded by Wellington Street to the west, Peakman Street to the north, Victoria Street to the east and Queen Street to the south.
- 5.43 There are a number of options for accessing the main shopping area of the town centre, all of which involve walking through the Civic area and then into the shopping centre. The bus station is located at the opposite end of the main shopping area but can be accessed directly through the shopping centre.
- The site falls within the Town Centre (Policy E(TCR).1) which is identified on the Local Plan Town Centre Inset Map (2006). The Redditch Town Centre Strategy (2009) states that there is a need to review the demand for car parking in the town centre to determine whether or not it is required. We have assumed that redevelopment of this site could be up to five storeys in heights, with around 80% (1st floor and above) suitable for offices with more active uses, such as retail, cafés and restaurants on the ground floor. This is a key site for office development if Redditch is to come anywhere near to achieving the WMRSS target (or even the lower target we propose earlier in this section). The Council will need to review its strategy, particularly relating to the development of residential and / or the need for additional car parking within the town centre in determining the most appropriate mix of uses for this site.

Pool Place (Medium to Long Term)



- 5.45 Pool Place is 1.65ha in size and consists of a retail park and large surface car park. Key occupiers at the retail park include Halfords, Currys and Wickes. The site is bounded by Ipsley Street to the south, Redditch Ringway to the north and Other Road to the east. The surrounding area consists of other similar retail outlets with large surface car parks. Occupiers include Aldi, Iceland, KFC and Blockbuster Videos.
- 5.46 The main shopping area of the town centre is accessed via Redditch Ringway and then Silver Street. The bus station can then be accessed directly via the main shopping centre.
- 5.47 The site falls within the Peripheral Zone (Policy E(TCR).3) which is identified on the Local Plan Town Centre Inset Map (2006). Proposals within this area should complement the role and function of the Town Centre and comprise a single use or mix of uses including residential, retail, commercial, light industrial, warehousing, social, community, education, leisure or entertainment. We have assumed that with a five storey development and a mix of 80% offices / 20% to other uses, around 8,000 sq m (85,000 sq ft) of office floorspace could be provided on this site.

Grove Street (Medium to Long Term)



- 5.48 The site at Grove Street is 1.02ha in size. It consists of two large retail park units occupied by Lidl and Staples and a large surface car park. It is bounded by Grove Street to the north and Redditch Ringway to the south. There are further retail warehouse units located to the south of the site, such as those at the Pool Place site. To the north of the site is a residential area.
- 5.49 The main shopping area of the town centre is accessed via Redditch Ringway and then Silver Street. Key transport interchanges such as the bus station can be accessed directly via the main shopping centre.
- 5.50 The site falls within the Peripheral Zone (Policy E(TCR).3) which is identified on the Local Plan Town Centre Inset Map (2006). We have assumed that with a five storey development and a mix of 80% offices / 20% to other uses, around 4,900 sq m (53,000 sq ft) of office floorspace could be provided on this site.

Scale of Development

5.51 We recognise that the proposed redevelopment of the Pool Place and Grove Street sites represents a more radical reconfiguration of the town centre and would involve the relocation of some important town centre retailers. We have included them within our assessment in order to demonstrate the scale of change required to provide a significant proportion of Redditch's RSS office requirement within the town centre. Our assessments have shown that,

excluding the Pool Place and Grove Street sites, around 9,000 sq m (95,000 sq ft) of office floorspace could be developed, which represents around one fifth of the Borough's office requirements. With the two additional sites at Pool Place and Grove Street, we anticipate that the office capacity could increase to around 22,000 sq m (233,000 sq ft). This would provide almost half of the Borough's office requirement, based on the current WMRSS EiP Panel Report. Based on our adjusted target of 30,000 sq m, the town centre would be able to provide around three guarters of the predicted demand if all identified sites were redeveloped.

- 5.52 From our assessments of the potential sites within the town centre, it is evident that there are insufficient opportunity sites within the town centre and peripheral zone to accommodate the scale of office growth as indicated within the WMRSS. We would therefore recommend that the Council looks to sites outside the town centre and peripheral zone in accordance with Policy E(TCR).4 of the Redditch Local Plan. This would involve looking at potential sites sequentially firstly to areas within or adjoining a District Centre, then to out of centre sites.
- 5.53 Based on our assumptions of all sites being redeveloped and looking to our adjusted target of 30,000 sq m, we would recommend that the Council would need to identify at least an additional 2.3ha to accommodate the office requirements of the town centre that cannot be met within its boundaries. This is based on all identified sites above being redeveloped and assumes that for sites outside the town centre / peripheral zone an average building height of three storeys (this is at the lower end of our assumptions due to the development being outside the town centre), a plot ratio of 40% and 3,000 sq m per net hectare. It also assumes single use as offices would be preferred outside the town centre.
- 5.54 If larger sites such as Pool Place and Grove Street are not redeveloped, the additional requirement for land outside the town centre and peripheral zone would be increased to around 5.9ha.
- 5.55 The next section of this report provides our conclusions to the Study.

6. CONCLUSIONS

- 6.1 This section of the report provides our conclusions to the Study, based around the following key findings:
 - The desire for businesses to be located within the town centre is high and key occupier requirements within the town centre are affordable rental levels, flexible accommodation and a location accessible to major transport routes;
 - The provision of office space within the town centre is concentrated within five key buildings, and that unit sizes are generally small (less than 100 sq m (1,100 sq ft));
 - There are currently no pipeline office developments within the town centre or peripheral zone;
 - Lettings of office floorspace in Redditch Borough have seen a gradual increase over the period from January 2000 to March 2009, with average take up being around 3,800 sq m (41,000 sq ft) per annum, whilst the freehold sales market is more limited;
 - Rental levels within the town centre compare favourably to those in comparator centres and this, combined with Redditch's good transport links make it an attractive location in market terms;
 - Vacancy levels for office stock in the town centre are currently at their highest level in over a decade at around 19% of the total stock;
 - In attempting to provide the requirement of 45,000 sq m of new office floorspace will
 require a more focussed emphasis on development taking place in the town centre, rather
 than out of town as has been the case in the past;
 - Identified potential sites within the town centre and peripheral zone have the capacity to accommodate around half of the WMRSS requirement, therefore it will be necessary to look to sites outside the town centre and peripheral zone in order to fulfil the WMRSS offices requirement; and
 - We have identified a revised offices target of 30,000 sq m over the Plan period, based on a combination of take up rates and the Employment Land Review undertaken in 2008. Identified potential sites have the capacity to accommodate around three quarters of this demand.

6.2 Below we highlight some of the key issues that are affecting Redditch Town Centre and propose solutions to them that we feel could improve the town centre's office market.

Place Marketing

6.3 Our property market evidence has shown that in the past, potential investors to Redditch Borough have favoured out of town locations with them attaching greater importance to onsite car parking, security and motorway accessibility, and historically many occupiers have looked to the M42 corridor for accommodation. In recent years however, occupiers in certain sectors are increasingly looking to town centres for reasons of sustainability, profile, transport links and supporting amenities and the proximity of the train station to the town centre (with a frequent link to Birmingham city centre and the wider conurbation) provides Redditch with a advantage over competitor centres such as Bromsgrove and Worcester. It will be essential therefore, that there is a step change in the way that the Borough Council promotes the town centre and its image as an office location. This "place marketing" should be undertaken by the local authority, with the support of the Worcestershire Economic Development and Regeneration Unit and other inward investment agencies in the County in order to raise the profile of the town centre and attract potential occupiers. In addition, we have suggested that the Council identifies key market sectors that could be attracted to Redditch town centre, in particular those sectors that have higher levels of demand than current target sectors.

Creating Momentum in the Town Centre

The town centre has suffered from a lack of significant new office development in recent years. This has lead to stagnation in the market with a lack of big office occupiers locating in the town centre. The current extraordinary market conditions that are being experienced can be seen as an opportunity for increased public sector intervention in land assembly to ensure that the town centre has a portfolio of 'fit for market' land and premises available once investor confidence returns to the market. In terms of attracting occupiers, RBC should look to identifying regional / sub regional public sector organisations who may be looking to relocate to a town centre location in order to give the office market some momentum, if the private sector market remains stagnant.

Creating a Different Product

6.5 At present Redditch Town Centre lacks the balanced portfolio of office accommodation to attract high profile investors. Unit sizes are generally small, and there has been little new office development in the last 20 - 30 years. In order to deliver the scale of office

development required, Redditch town centre will need to offer a different office product to what is currently available, to include modern office buildings with flexible space capable of accommodating medium to large businesses. We would also suggest that supporting amenities are as important as the accommodation available and within Redditch Town Centre; the offer needs to be considerably improved, in order to create a comprehensive product to offer to the market.

Reviewing the Economic Strategy and Sector Focus for the Borough

- 6.6 Redditch has plenty to offer companies across a range of industries and sectors, but this has not been adequately communicated in the past. There needs to be a series of propositions developed that identify the opportunities, strengths and key assets of the area for businesses in different fields.
- 6.7 The recently adopted Economic Strategy needs to facilitate this and provide a more in-depth and holistic look at the types of sectors that should be prioritised, by weighing up the area's particular strengths and needs. There needs to be a particular focus on helping to raise the levels of skills across Redditch, especially NVQ Level 3 and upwards. The Economic Strategy will need to be reviewed regularly in order to ensure that the needs of the Borough are being met.

Land Use Policy Change & Land Assembly

This is a key point for the town centre, in particular if it is to accommodate the level of growth required by the WMRSS, or indeed the revised target of 30,000 sq m as set out in this report. In order for the town centre to grow as an office location, there will need to be a change in policy direction to prioritise the development of office uses within the town centre boundary. This would mean giving the development of offices a similar level of priority as other uses such as residential and leisure to create a vibrant and mixed town centre. To ensure that this programme of land assembly and land use change is effectively managed it is essential that closer working relationships are developed and a regular dialogue opened between economic development officers and policy planners within the Local Authority.

APPENDIX A - SURVEY QUESTIONNAIRE

CONSULTATION QUESTIONNAIRE

Business Background	
Company Name	
Company Name	
Address	
Is this your main address? ☐ Yes ☐ No	
Is this your head office?	
□Yes	
□No	
Contact name	
Position	
Phone	
	
Email	
Company type	
Year founded	
Main company activities	
mani company activities	
Please select any of the sectors	listed that you work in
☐ Automotive	
Aerospace	
Rail	
☐ Building Technologies	
☐ Food & Drink ☐ ICT	
☐ Medical Technologies	
☐ Manufacturing	
☐ Tourism & Leisure	
☐ Environmental Technologies	
Screen Image & Sound	
☐ Business & Professional Service	
High Added Value Consumer F	Products
Other (please state)	

No of employees	Page 52
Full time	
Dout time	
Part time	
Turnover for previous financial	years
Current year	ı
Last year	
Edot your	
2 years ago	
Location Information	
Why is the business in its curre	nt office accommodation?
Positive factors of the current p	premises
Negative facors of the current p	premises
Has the business moved within ☐ Yes	the last 3 years?
☐ No	
If yes, what were the reasons for	or moving?
What were the reasons for choo	osing the current premises?
_ ,,, _,,,,,	
Expectations & Aspiration	IS Control of the con
Business ambitions	
Business unbitions	
Aspirations for growth in the ne	ayt 5 years
Aspirations for growth in the ne	int 3 years

Are there any issues relating to premises that represe வெள்ளே challenges and threats to their aspirations? If yes, what?		
aspirations: if yes, what:		
Location/Expansion Plans		
Do you have current plans to extend or relocate?		
☐ Yes - Extend ☐ Yes - Relocate		
Yes - Extend or Relocate		
□No		
If yes, what are the requirements:		
Space		
Under 1,000ft ² (under 100m ²)		
$\frac{1}{1,000 \text{ft}^2} - 5,000 \text{ft}^2 \text{ (between } 100 \text{m}^2 - 500 \text{m}^2\text{)}$ $\frac{5,001 \text{ft}^2}{1,000 \text{ft}^2} - 10,000 \text{ft}^2 \text{ (between } 501 \text{m}^2 - 1000 \text{m}^2\text{)}$		
20,001ft ² – 50,000ft ² (between 2,001m ² – 5,000m ²)		
$\frac{1}{2}$ 50,001ft ² - 100,000ft ² (between 5,001m ² - 10,000m ²)		
Over 100,000ft ² (over 10,000m ²)		
☐ Actual figure (please state)		
Location		
Redditch		
Other (please state)		
Facilities		
Which of the following aspects do you consider to be essential when relocating?		
Flexible modular unites that can be adapted or expanded to meet changing requirements		
☐ Land to construct purpose built facilities to own requirements ☐ Affordable rent		
Location accessible to main transport routes		
Location close to sources of employees		
Other (please state)		

APPENDIX B - DETAILS OF CURRENT OFFICE PROVISION IN REDDITCH TOWN CENTRE

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Notes	VOA classifies part of gnd flr as "office/shop"	U Also in building but not included in figures:Gnd fir = retail of 24.3 sqm and office of 28.1 sqm; building used by estate agency	Also in building but not included in figures: Gnd fir = retail zone of 15.1 sqn and office of 11.8; unclear but assume office space on 1st floor available separately (building currently used by North Worcestershire Community Drug Team) Also in building: Gnd fir = retail of 32.94 sqm; unclear but assume office space on 1st floor available separately (building currently used by Tyrrell	Residential Lettings)	On VOA website category is office but fir use is currently specified as retail zone and storage (building occupied by Vizors estate agency)	On VOA website category is office but fir use includes retail area of 71.53 sqm on gnd fir - unclear but assume office space available separately (building currently occupied by Pertemps recruitment agency)	
Used / To let?	To let To let	Gnd and part of 1st iir (404.50 sqm) to let	To let	To let To let		2nd floor (25.01 sqm) to let	
Total floor space No. of (sqm) floors Which floors?	53.90 2 1st, 2nd 116.00 2 1st, 2nd 148.50 3 Gnd, 1st, 2nd 31.40 1 1st 279.42 1 1st 140.40 1 LGnd	1626.70 3 Gnd, 1st, 2nd 5621.80 6 LGnd-5th 55.70 2 1st, 2nd 194.70 3 Gnd, 1st, 2nd 225.50 2 1st, 2nd 433.30 4 LGnd-2nd		38.70 1 1st 112.91 2 Gnd, 1st 93.76 1 1st 58.57 1 2nd 49.10 1 1st 62.70 1 2nd	97.21 3 Gnd, 1st, 2nd 150.50 2 1st, 2nd	30.70 1 Gnd 152.10 2 1st, 2nd 76.81 3 Gnd, 1st, 2nd 18.50 1 Gnd	116.50 1 Gnd 1122.10 3 LGnd, Gnd, 1st 349.40 3 LGnd, Gnd, 1st 170.60 1 Gnd 348.80 2 Gnd, 1st 139.50 2 Gnd, 1st 152.77 1 Gnd
f Address (as on VOA website)	1, (1ST & 2ND FLRS) 3, (1ST & 2ND FLRS) 5, 7, 15, (UNIT 5) LGND FLR AT THE OLD CHURCH,	THREADNEEDLE HOUSE, TOWN HALL, 47, 6, 1.GTFLR REAR & 2ND FLR) 5 & BEECH HOUSE,	7, 8A,	11A, 12, (GND & 1ST FLR REAR) 12, (1ST FLR) 13, (2ND FLR) 14-15, (1ST FLR) 14-15, (2ND FLR)	17, 24-25, (1ST & 2ND FLRS)	6, 9, (1ST & 2ND FLRS) CROWN MEWS. REGISTRARS OFFICE, CHILD PROTECTION DEPARTMENT, SMALLWOOD HEALTH CENTRE, FIDICATION DEPARTMENT SMAIL WOOD	
Street	Alcester Street Alcester Street Alcester Street Alcester Street Alcester Street Alcester Street	Alcester Street Alcester Street Archer Road Bates Hill Church Green East Church Green East	Church Green East Church Green East	Church Green East Church Green East Church Green East Church Green East Church Green East Church Green East	Church Green East Church Green East	Church Green West Church Green West Church Green West Church Green West	Church Green West Church Green West Church Green West Church Road Church Road Church Road Easemore Road
Postcode	B98 8AE B98 8AE B98 8AE B98 8AE B98 8AE B98 8AE	B98 8AE B98 8AH B98 8DJ B97 4AN B98 8BP B98 8BP	B98 8BP B98 8BP	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	B98 8BP B98 8DE	B97 4DY B97 4DU B97 4DU B97 4DU B97 4DU	B97 4DU B97 4DU B97 4DU B97 4AD B97 4AB B97 4AB

To let	Tolet	1st floor suite to let To let	To let Various suites to let in building
1st, 2nd 2nd 2nd 2nd 2nd 2nd 2nd 2nd 2nd 2nd	Gnd 1st 1st 1st 1st 3rd 3rd 2nd 2nd 1st, 2nd 1st, 2nd 1st, 2nd 1st, 2nd	Gnd, 1st, 2nd Gnd, 1st Gnd, 1st 2nd 3rd	3rd Gnd 1st 2nd 2nd 2nd 3rd 4th 4th 4th 5th 5th
0		6 44 44	
181.60 76.40 122.10 176.60 87.80 237.50 88.10 88.20 102.10 225.20	221.70 221.70 77.10 47.00 27.00 19.70 33.40 34.60 183.76 80.00 34.70 151.80 116.40 202.30 124.30 163.00	183.40 940.18 1291.10 703.10 480.30	760.30 538.70 150.50 569.70 163.00 569.70 162.17 245.30 165.40 64.90 83.10
H & L LEGAL, SUITE A CANON NEWTON HOUSE SUITE A CANON NEWTON HOUSE SUITE D CANON NEWTON HOUSE SUITE C CANON NEWTON HOUSE SUITE E CANON NEWTON HOUSE SUITE F CANON NEWTON HOUSE SUITE G CANON NEWTON HOUSE SUITE H CANON NEWTON HOUSE SUITE J CANON NEWTON HOUSE SUITE A CANON NEWTON HOUSE	42A, 2, (1ST FLR) 6, (OFFICE 1 & 2) 6, (OFFICE 3 & 4) 6, (OFFICE 9) 6, (OFFICE 9) 6, (ST BASILS RELOCATION TEAM) 6, (ST BASILS RELOCATION TEAM) 6, (ST BASILS RELOCATION TEAM) 7, THE STEPS, 7, THE STEPS, 10-11, 11 ROYAL HOUSE, (OFFICES 1-2) 11 ROYAL HOUSE, (OFFICES 4-6)	3, PROSPECT HOUSE ST STEPHENS HOUSE, (GND & 1ST FLRS) ST STEPHENS HOUSE, (GND & 1ST FLRS) ST STEPHENS HOUSE, (2ND FLR WEST) ST STEPHENS HOUSE, (3RD FLR SOUTH)	ST STEPHENS HOUSE, (3RD FLR WEST) SUITE 1 GROSYENOR HOUSE, SUITE 4 GROSYENOR HOUSE, SUITE 5 GROSYENOR HOUSE, SUITE 6 GROYESNOR HOUSE, SUITE 7 GROSYENOR HOUSE, SUITE 94 GROSYENOR HOUSE, SUITE 10 GROSYENOR HOUSE, SUITE 110 GROSYENOR HOUSE, SUITE 111 GROSYENOR HOUSE, SUITE 111 GROSYENOR HOUSE, SUITE 111 GROSYENOR HOUSE, SUITE 111 GROSYENOR HOUSE,
Herbert Street (KSC) Evesham Walk	(KSC) Evesham Walk (KSC) Walford House Market Place Market Place Market Place Market Place Market Place	Prospect Hill Prospect Hill Prospect Hill Prospect Hill	Prosped Hill
B98 8BL B97 4HA B97 4HA B97 4HA B97 4HA B97 4HA B97 4HA B97 4HA B97 4HA	B97 4HA B97 4EX B97 4EX B98 8AA B98 8AA B98 8AA B98 8AA B98 8AA B98 8AA B98 8AA B98 8AA	B97 4BG B97 4DP B97 4DP B97 4DP	B97 4DP B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q B97 4BY/Q

Various suites to let in building Various suites to let in building Various suites to let in building Various suites to let in building To let	Under offer (as at Feb 2008)	Under offer (as at Feb 2008)	For sale
55 th 55 th 2 2 d 2 2 d 2 2 d 2 2 d 2 d 2 d 2 d 2 d	Gnd, 1st Gnd 2nd 1st 1st, 2nd 2nd 1st, 2nd 1st, 2nd	LGnd, Gnd, 1st 2nd 1st Gnd, 1st Gnd, 1st 1st 1st 1st 1st 1st 1st 1st Gnd	Gnd, 1st 1st Gnd, 1st
	00-0-	w 0 w 0	2 2 2 sq ft sq ft
43.10 63.90 166.50 162.70 209.30 191.40 21.70	202.14 70.48 32.90 50.60 193.20 58.60 204.30 71.90	374.60 60.35 76.80 157.77 17.50 42.50 222.56 36.10 40.60 26.20 102.70 102.70 101.50 49.10 35.90 101.70 49.10 35.90 101.70 49.10 35.90 101.70 49.55 49.55 49.55 49.55 49.59 49.50 40 40 40	408.95 77.10 73.79 294474 sq.ft 271,400 23.074 294,474
SUITE 11D GROSVENOR HOUSE, SUITE 11E GROSVENOR HOUSE, SUITE 12, GROSVENOR HOUSE, SHORT WING GROSVENOR HOUSE, 1-4, (ZND FLR) 7, (SUITE 21 & 3) 7, (PART SUITE 2) 7, (PART SUITE 2)	20, 22, (GND FLR FRONT) 22, (1ST & 2ND FLRS) 23, (1ST FLR & PART 2ND FLR) 41-43, (PART 2ND FLR) 4,	144-146 ESTATE HOUSE, 144-146 ESTATE HOUSE, 7-10	s HOUSE M HEATING AND PLUMBING, LD HOUSE, ITY HEAT, 25,214 2.144 27,358
B97 4BY/Q Prospect Hill B97 4BY/Q Prospect Hill B97 4BY/Q Prospect Hill B97 4BY/Q Prospect Hill B97 4EU Unicorn Hill B97 4QN Unicorn Hill B97 4CN Unicorn Hill B97 4EX Unicorn Hill			B97 4EN Ludlow Road 2, KINK B98 7DN Oswald Street OSWAI B98 7AZ Smallwood Street COUN' Source of data is tha valuation office agency Area sq m Town Centre Peripheral Zone Total

APPENDIX C - DETAILS OF LEASEHOLD / FREEHOLD SALES IN REDDITCH

Period - 01 Jan 2000 - 31 Mar 2000		
Market Status LET		
Band	No. of units	
0 - 500	2	
500 - 1000	1	
1000 - 2500	3	
2500 - 5000	0	
5000 - 10000	0	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 01 Jan 2000 - 31 Mar 2000				
Market Status SOLD				
Band	No. of units			
0 - 500	0			
500 - 1000	0			
1000 - 2500	0			
2500 - 5000	0			
5000 - 10000	1			
10000 - 20000	0			
20000 - 50000	0			
50000 - 100000	0			
100000+	0			

Period - 01 Apr 2000 - 30 Jun 2000			
Market Status LET			
Band	No. of units		
0 - 500	1		
500 - 1000	0		
1000 - 2500	0		
2500 - 5000	0		
5000 - 10000	0		
10000 - 20000	0		
20000 - 50000	0		
50000 - 100000	0		
100000+	0		

Period - 01 Apr 2000 - 30 Jun 2000			
Market Status SOLD			
Band	No. of units		
0 - 500	0		
500 - 1000	0		
1000 - 2500	0		
2500 - 5000	0		
5000 - 10000	1		
10000 - 20000	0		
20000 - 50000	0		
50000 - 100000	0		
100000+	0		

Period - 01 Jul 2000 - 30 Sep 2000				
Market Status LET				
Band	No. of units			
0 - 500	2			
500 - 1000	3			
1000 - 2500	2			
2500 - 5000	1			
5000 - 10000	0			
10000 - 20000	0			
20000 - 50000	0			
50000 - 100000	0			
100000+	0			

Period - 01 Oct 2000 - 31 Dec 2000	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2000 - 31 Dec 2000	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2001 - 31 Mar 2001	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	5
2500 - 5000	2
5000 - 10000	1
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2001 - 31 Mar 2001	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Apr 2001 - 30 Jun 2001	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Apr 2001 - 30 Jun 2001	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	0
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2001 - 30 Sep 2001	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	1
1000 - 2500	1
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2001 - 31 Dec 2001	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	3
2500 - 5000	0
5000 - 10000	0
10000 - 20000	1
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2001 - 31 Dec 2001	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	0
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2002 - 31 Mar 2002	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	2
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Apr 2002 - 30 Jun 2002	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	0
1000 - 2500	2
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2002 - 30 Sep 2002	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	1
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2002 - 31 Dec 2002	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2003 - 31 Mar 2003	
Market Status LET	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	3
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2003 - 31 Mar 2003		
Market Status SOLD		
Band	No. of units	
0 - 500	0	
500 - 1000	0	
1000 - 2500	1	
2500 - 5000	0	
5000 - 10000	1	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 01 Apr 2003 - 30 Jun 2003		
Market Status LET		
Band	No. of units	
0 - 500	0	
500 - 1000	1	
1000 - 2500	2	
2500 - 5000	0	
5000 - 10000	0	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 01 Apr 2003 - 30 Jun 2003	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2003 - 30 Sep 2003		
Market Status LET		
Band	No. of units	
0 - 500	2	
500 - 1000	0	
1000 - 2500	1	
2500 - 5000	0	
5000 - 10000	1	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 01 Jan 2004 - 31 Mar 2004		
Market Status LET		
Band	No. of units	
0 - 500	1	
500 - 1000	1	
1000 - 2500	0	
2500 - 5000	1	
5000 - 10000	0	
10000 - 20000	1	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 01 Jan 2004 - 31 Mar 2004	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Apr 2004 - 30 Jun 2004	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	3
1000 - 2500	2
2500 - 5000	1
5000 - 10000	0
10000 - 20000	1
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Apr 2004 - 30 Jun 2004	
Market Status SOLD	
Band	No. of units
0 - 500	1
500 - 1000	0
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2004 - 30 Sep 2004	
Market Status LET	
Band	No. of units
0 - 500	2
500 - 1000	1
1000 - 2500	1
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2004 - 31 Dec 2004	
Market Status LET	
Band	No. of units
0 - 500	4
500 - 1000	2
1000 - 2500	5
2500 - 5000	0
5000 - 10000	0
10000 - 20000	1
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2004 - 31 Dec 2004	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	1
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2005 - 31 Mar 2005	
Market Status LET	
Band	No. of units
0 - 500	4
500 - 1000	0
1000 - 2500	3
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2005 - 31 Mar 2005	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	0
5000 - 10000	0
10000 - 20000	1
20000 - 50000	1
50000 - 100000	0
100000+	0

Period - 01 Apr 2005 - 30 Jun 2005	
Market Status LET	
Band	No. of units
0 - 500	5
500 - 1000	1
1000 - 2500	4
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2005 - 30 Sep 2005	
Market Status LET	
Band	No. of units
0 - 500	4
500 - 1000	6
1000 - 2500	2
2500 - 5000	0
5000 - 10000	1
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jul 2005 - 30 Sep 2005	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	0
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Oct 2005 - 31 Dec 2005	
Market Status LET	
Band	No. of units
0 - 500	2
500 - 1000	0
1000 - 2500	3
2500 - 5000	0
5000 - 10000	2
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2006 - 31 Mar 2006	
Market Status LET	
Band	No. of units
0 - 500	3
500 - 1000	2
1000 - 2500	1
2500 - 5000	0
5000 - 10000	1
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 01 Jan 2006 - 31 Mar 2006	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 31 Mar 2006 - 30 Jun 2006	
Market Status LET	
Band	No. of units
0 - 500	2
500 - 1000	3
1000 - 2500	5
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Jun 2006 - 30 Sept 2006	
Market Status LET	
Band	No. of units
0 - 500	7
500 - 1000	1
1000 - 2500	2
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Sept 2006 - 31 Dec 2006	
Market Status LET	
Band	No. of units
0 - 500	5
500 - 1000	1
1000 - 2500	2
2500 - 5000	1
5000 - 10000	0
10000 - 20000	1
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 31 Dec 2006 - 31 Mar 2007	
Market Status LET	
Band	No. of units
0 - 500	2
500 - 1000	1
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 31 Mar 2007 - 30 Jun 2007	
Market Status LET	
Band	No. of units
0 - 500	4
500 - 1000	3
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Jun 2007 - 30 Sep 2007	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	1
1000 - 2500	4
2500 - 5000	2
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Jun 2007 - 30 Sep 2007	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	0
1000 - 2500	0
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Sep 2007 - 31 Dec 2007	
Market Status LET	
Band	No. of units
0 - 500	2
500 - 1000	3
1000 - 2500	2
2500 - 5000	2
5000 - 10000	1
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Sep 2007 - 31 Dec 2007	
Market Status SOLD	
Band	No. of units
0 - 500	0
500 - 1000	1
1000 - 2500	0
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

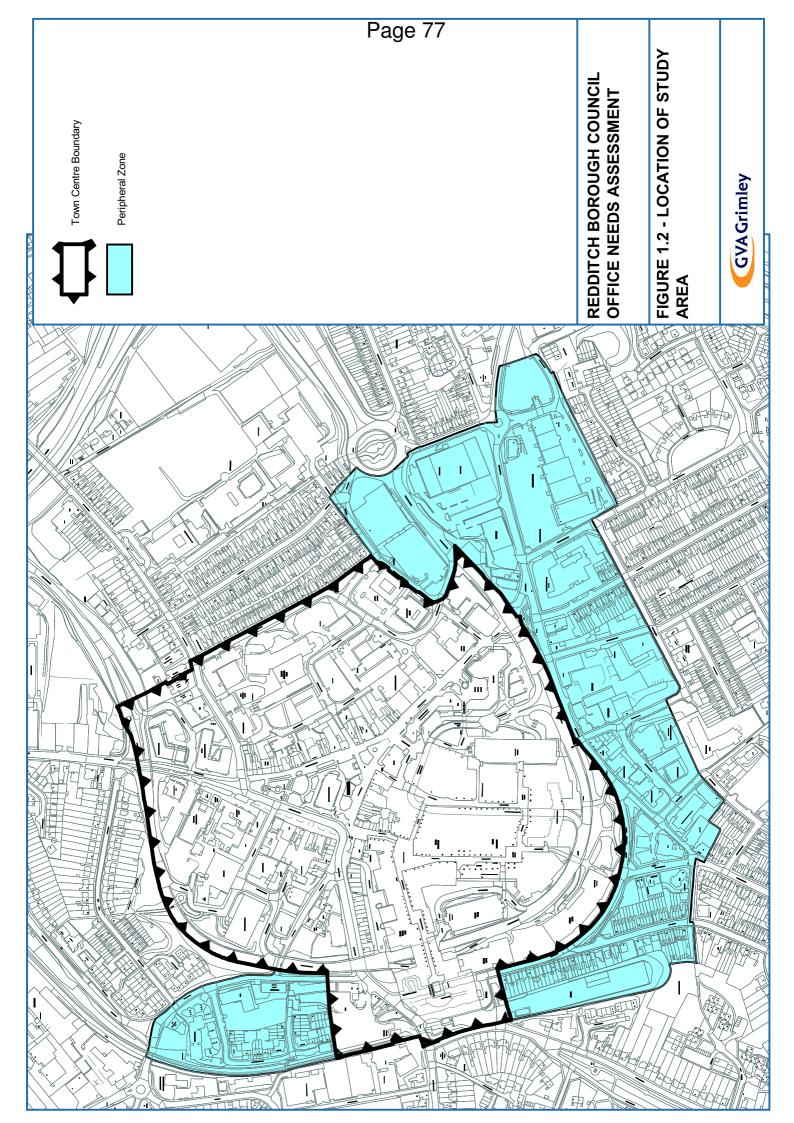
Period - 31 Dec 2007 - 31 Mar 2008	
Market Status LET	
Band	No. of units
0 - 500	1
500 - 1000	0
1000 - 2500	1
2500 - 5000	0
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 31 Mar 2008 - 30 Jun 2008		
Market Status LET		
Band	No. of units	
0 - 500	3	
500 - 1000	1	
1000 - 2500	1	
2500 - 5000	2	
5000 - 10000	1	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 30 Jun 2008 - 30 Sep 2008	
Market Status LET	
Band	No. of units
0 - 500	4
500 - 1000	2
1000 - 2500	6
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0

Period - 30 Sep 2008 - 31 Dec 2008		
Market Status LET		
Band	No. of units	
0 - 500	1	
500 - 1000	0	
1000 - 2500	0	
2500 - 5000	1	
5000 - 10000	1	
10000 - 20000	0	
20000 - 50000	0	
50000 - 100000	0	
100000+	0	

Period - 31 Dec 2008 - 31 Mar 2009	
Market Status LET	
Band	No. of units
0 - 500	5
500 - 1000	2
1000 - 2500	3
2500 - 5000	1
5000 - 10000	0
10000 - 20000	0
20000 - 50000	0
50000 - 100000	0
100000+	0



Redditch Borough Council

WATER QUALITY

Management Arrangements
for the Control of Legionella
and Maintenance of Wholesome Water Quality
in Redditch Borough Council owned and managed
Buildings

Prepared by: John Homer

Asset maintenance

Issued by: Asset Maintenance Team

Document last revised 25rd November 2009

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1 Introduction

1.1 Redditch Borough Council accepts that it has a responsibility to protect employees and others who may be affected by its business operations against the risk of legionella infection (legionellosis) arising from plant, equipment, facilities, work or work-related activities, and will implement the procedures in this document to ensure that this responsibility is met.

This document sets out the guidance and strategy that Redditch Borough Council will follow, and includes the framework of the procedures for achieving and maintaining it. This framework defines the stages and describes the objectives at each stage; specifies the management, operational and specialist responsibilities and lays down a clear management and communication structure to ensure that it fails safe, wherever practicable.

This document is designed to cover all water and air "risk systems" and not solely from the legionellosis viewpoint. The provision of safe and wholesome water supplies is also considered vital to the services provided from Redditch Borough Council owned and managed properties, and the document includes guidance and procedures for the checking, inspection, testing, recording and managing of all water and air systems within these buildings in order to achieve this.

This guidance has been produced based on the policy adopted by Worcestershire County Council and is a mechanism to formalise the water hygiene strategy that already exists within Redditch Borough Council.

This guidance further acknowledges that the Borough Council owns a number of buildings, many of which comprise several separate buildings. As such, the wording of the Approved Code of Practice (ACoP) must be interpreted in recognition of this property portfolio. Further attention is paid to the fact that property is bought, sold, leased, constructed, extended, modified and demolished on a regular basis. Hence, although the Council's Water Quality guidance itself may not change, the schedule of buildings to which it applies will be subject to continual change.

Appendix 1 will be kept under continual review, and revised as the property portfolio changes. It forms the basis of the Council's prioritised programme of Risk Assessments and remedial works.

1.2 **Definition of Risk Categories**

An initial assessment of risks has been undertaken. The risk assessment took into account:

- (a) the age, complexity and condition of the water and air system in the buildings
- (b) the susceptibility of the occupants and visitors

Within the vast majority of the Council's premises, the susceptibility of the occupants will be no greater than that of the general population, and the water and air services will be of average complexity and in reasonable condition. Most premises, therefore, will pose a STANDARD RISK.

However, certain sites such as Homes for Older People will have occupants whose susceptibility to infection could be higher than average. Some premises may have swimming pools, showers and other water and air systems which increase the risk of aerosol generation, or where the age and complexity of installed systems increase the risk of bacterial growth due to stagnation or other factors. They may also have shared-use sports facilities where members of the public are given access, where the occupants' susceptibility to infection cannot be defined or categorised. Such premises

will pose a higher than average risk. By comparison with Healthcare Premises, where the occupants can frequently be highly susceptible to infection or immuno-compromised by virtue of their condition or treatment, Local Authority premises do not pose a 'high' risk. By comparison with the average, however, these premises pose an increased level of risk and for the purposes of this policy they are classed as INCREASED RISK.

There will also be premises with minimal water systems, no mechanisms for aerosol generation and no water storage, such as Crematorium, museums and Industrial units. These premises have been assessed as posing a LOW RISK.

LIST PRIORITY	RISK FACTOR	TYPE OF PREMISES OR SYSTEMS	
A	Increased	Homes for Older People Residential Premises Hostels and Group Homes Day Centres for Older People Homes for Mentally III People Outdoor Education Centres Sport & Leisure Centres Football Changing Rooms Countryside Centre/ Youth afloat	
В	Standard (Non-Education)	Offices (larger/complex systems) Community Centres Youth Centres Theatre Void Housing stock	
С	Low	Crematorium Offices (smaller) Industrial Units Housing stock	

1.3 Risk Assessment and Methodology

This Water Quality guidance sets out to introduce the concept of Legionella Risk Assessment and Review. At present the authority is undertaking Bi-yearly risk assessments of the water systems and the cleaning and disinfection of storage tanks with some ad hoc disinfection of shower heads.

It is considered desirable to continue with the timescales of Legionella risk assessments that exist at Redditch Borough Council: - Public buildings and sheltered accommodation have the risk assessments carried out alternate years therefore spreading the cost over a 2 year period.

As part of the inspections, sampling will be undertaken to assess the potential for bacterial growth other than Legionella, and water quality degradation that may arise from storage or transmission of drinking water within Redditch Borough Council, owned and managed premises.

The following Table 1 sets out the sequence of management actions and priorities which Redditch Borough Council intends to implement in order to manage the control of legionella as part of its overall Water Quality management update and revision.

TABLE 1

STEP	ACTION	BY WHOM	TARGET COMPLETION
1	Undertake Full Risk Of Public Buildings	Specialist Contractor	Completed 2007 Resurveyed 2009
2	Undertake remedial works at Public Buildings	Specialist and Maintenance Contractors	High risk remedial works carried out
3	Undertake Full Risk Of Sheltered Accommodation	Specialist Contractor	Complete 2008
4	Undertake remedial works at Sheltered Accommodation	Specialist and Maintenance Contractors	High risk remedial works carried out
5	Undertake works to install temperature gauges and temperature monitoring points in all buildings	Heating Engineers	2010
6	Set up procedures and monitoring forms for temperatures and training of staff	Asset Maintenance/ Housing Capital	2010 "Subject to approval of revenue budget bids"
7	Complete schematic drawings of the heating schemes for each of the buildings	Asset Maintenance/ Housing Capital and Specialist contractor	2010
8	Review all Full Risk Assessments every 2 years or when original Assessment becomes invalid	Specialist contractor	Ongoing
9	Carry out programme of training for Staff, Consultants & Contractors	Professional Training Consultant	2010
10	Undertake 2-yearly refresher training	Training Consultant	On-going

2 Management Policy

The overall policy for the management of water services can be summarised as follows:

- 2.1 To have clear procedures for the design and management of water services in buildings.
- 2.2 To have specific lines of responsibility for the management of water services.
- 2.3 To identify locations with high risk users of premises.
- To identify, where possible, potential risk areas due to materials, storage methods, poor installation etc within the buildings.
- 2.5 To check on a regular basis the quality of the water within the buildings.

- 2.6 To train staff and contractors to ensure that works carried out on water services comply with legislation and Borough Council policy.
- 2.7 To ensure that any risk of contamination is removed or reduced in an efficient, cost effective manner with the minimum disruption to building users.

3 Management Roles and Responsibilities

3.1 Head of Legal, Democratic & Property Services

The Head of Legal, Democratic & Property Services will be regarded as the "Duty Holder" under HSE Guidance Note L8. The Head of Legal, Democratic & Property Services is responsible for the overall policies relating to the maintenance and operation of Redditch Borough Council buildings.

Note There will be a new management structure taking effect in April 2010, where after it will be the Head of Resources who will be regarded as the "Duty Holder"

3.2 Technical staff

Asset Maintenance Team (Public Buildings)

Water policy, strategy for implementation, resource allocation and monitoring of water services management.

It will be necessary to identify a member of the Asset Maintenance Team to be the water management officer as part of their roles and responsibilities

The water management officer will undertake the role of Responsible Person as laid down in the HSC Approved Code of Practice L8. Liaison with Contractors and monitoring of treatment programme.

Advising on technical issues and co-ordinating the work Recommending revisions to guidance and procedures in the light of technical development. Ensuring guidance is implemented during design, installation and commissioning of water services.

Housing Capital Team (Sheltered Accommodation and Housing stock)

Water policy, strategy for implementation, resource allocation and monitoring of water services management.

It will be necessary to identify a member of the Housing Capital Team to be the water management officer as part of their roles and responsibilities

The water management officer will undertake the role of Responsible Person as laid down in the HSC Approved Code of Practice L8. Liaison with Contractors and monitoring of treatment programme.

Advising on technical issues and co-ordinating the work Recommending revisions to guidance and procedures in the light of technical development. Ensuring guidance is implemented during design, installation and commissioning of water services.

Project Designers / Contract Administrators

Implementation of guidance in the context of the projects being managed.

3.3 Building Managers / Officers-in-Charge

Co-operating with Asset Maintenance/ Housing Capital for surveys Arranging for guidance to be complied with by other providers of service.

Undertaking the 'occupier's duties' in Section 4.3 and Table 3.

3.4 Contractors

All Specialist Contractors working on water supply systems should comply with the Recommended Code of Conduct for Service Providers (Appendix 4), produced jointly by the British Association for Chemical Specialties and the Water Management Society

4 Survey Programme

4.1 Full Legionella Risk Assessment

A full Legionella Risk Assessment is required by the HSC Approved Code of Practice ACoP L8 for premises where

- the existing Risk Assessment is no longer valid;
- the building is newly acquired;
- the building is newly constructed;
- the water services have been substantially modified

Paragraphs 23 – 38 of the ACoP define the requirements for a suitable and sufficient Risk Assessment.

Each risk assessment shall be presented in the form of a water risk assessment report

Report format

- A header page dated and signed by the assessor
- A brief description of the site/ Photo and its core activity
- A summary sheet listing all the systems found and inspected, to include a numerical assessment of the risks associated with each system
- The result of all inspection, temperature measurements and other tests undertaken including the time and date of measurement or sampling

Survey sheets

- Cold water storage tank survey- domestic
- Cold water storage tank survey- non domestic
- Calorifiers survey
- Electric water heater survey
- Domestic water services temperature survey (incorporating showers and TMV's)
- Ducted air handling units (incorporating humidifiers)
- Drinking water survey
- Photographs should be included where appropriate to highlight specific points
- Schematic drawings of the water systems
- A general evaluation of the management procedures and compliance with the ACOP
- A prioritised list of detailed recommended remedial works
- Other facilities (plant and systems) with a risk potential

The risk assessments will be stored centrally with the Asset Maintenance Team

4.2 Visual Survey and Risk Assessment Review

An inspection will be carried out on all water supplies, storage and distribution services in accordance with the following:

All properties

Inspection Risk Assessment Review

Annually Bi-annually (every other year)

All in compliance with ACoP L8 Paragraph 38. The Risk Assessment shall also be reviewed whenever a particular premises is substantially extended or modified.

4.3 Routine Maintenance and Operational Monitoring Requirements

The following Tables summarise the requirements of ACoP L8 and specify the organisation responsible for carrying out the relevant actions. References: ACoP paragraphs 181 – 182, Checklist 2, Table 3.

Table 3

Frequency	Action	Responsibility
1. Weekly	Flush little-used outlets to drain without release of aerosols. Record.	Occupier
2. Weekly	Check and record blended water temperatures from thermostatic mixing valves where fitted. Confirm that stable temperature is attained within one minute.	Occupier (2)
3. Monthly	Check water temperatures at sentinel taps. Hot water >50°C after 1 minute, cold water <20°C after 2 minutes. Record.	Occupier (2)
4. Monthly	Check calorifier temperatures. Flow 60°C, return >50°C. Record.	Occupier (3)
5. Quarterly or as necessary	Dismantle, clean and descale shower heads and hoses. Record.	Occupier (1)
6. Six monthly	Measure incoming water temperature to cold water cisterns and water temperature remote from float valve. Record.	Maintenance Contractor
7. Six monthly (January and July)	Measure cold water temperature rise between incoming main and most distant outlet. Should be less than 2-3°C. Record.	Occupier (4)
8. Annually	Take sample and record condition of water from HWS calorifier drains.	Maintenance Contractor
9. Annually	Open and inspect internal surfaces of HWS calorifiers for scale and sludge and clean or descale as necessary. Record.	Maintenance Contractor
10. Annually	Check and record temperatures at a representative number of taps throughout the system, on a rotational basis.	Occupier (2)
11. Annually	Inspect cold water cisterns and carry out remedial work as necessary. Record work done and report outstanding defects.	Maintenance Contractor
12. Annually	Physically inspect the hot and cold water systems and check accuracy of schematic drawings. Note changes. Check for under-used fittings and report recommendations.	Scientific Services and/or Specialist Contractors

Notes

- (1) May be undertaken by competent maintenance operative using proprietary domestic kettle descaler (COSHH Regulations apply to use of chemicals at work), or by Maintenance Contractor. However, the person responsible must be clearly defined by the Occupier.
- (2) Shall be done using a simple digital thermometer with immersion probe.
- (3) Readings to be taken from fitted temperature gauges.
- (4) Should be done using digital thermometer as in (2). Sample points can be the nearest tap to the incoming main, and the most distant tap. These 'sentinel taps' should be labelled permanently to identify them.

Samples are to be taken at the same time as the visual survey is undertaken. In addition samples will be taken at a greater frequency, to be agreed with Scientific Services, where the water supply is obtained from a private source.

4.4 Special Areas

Samples shall be taken at an increased frequency to be agreed with Asset Maintenance Team in special circumstances, such as:

Re-circulated / grey water systems Storm water storage systems Rainwater harvesting systems Private or untreated water supplies and bore holes

NOTE this section has been included for completion of all areas of risk, Redditch Borough Council at present does not have any special installations.

5 Routine Sampling and Testing for Legionella

Routine sampling and analysis of water for Legionella is not recommended under normal circumstances in hot and cold water systems. HSC guidance, in ACoP L8, does not recommend routine sampling for Legionella other than in specific circumstances, and lists the following requirements for particular systems where routine testing for Legionella should be undertaken.

- (a) Where water distribution temperatures are reduced and biocides are used to control bacterial growth monthly sampling.
- (b) Where biocide or temperature levels are out of control weekly sampling until system is back in control.
- (c) Where a Legionella outbreak is suspected.
- (d) Hospital wards.

The complexity of the system will determine the number of samples taken but should never be less than 2 samples of cold water and 2 samples of hot water.

Annual sampling of the water systems will be undertaken as part of the annual review of the water systems.

The complexity of the system will determine the number of samples taken but should never be less than 2 samples of cold water and 2 samples of hot water per water system.

5.1 Sampling and Testing for General Water Quality

Annual sampling of the water systems will be undertaken as part of the annual review of the water systems.

The complexity of the system will determine the number of samples taken but should never be less than 2 samples of cold water and 2 samples of hot water per water system.

5.2 **Testing and Analysis**

The samples will be taken in accordance with an agreed and documented sampling procedure to defined quality standards (Appendix 2 is an example).

Samples will be sent for testing and analysis to a United Kingdom Accreditation services UKAS accredited laboratory, under controlled environmental conditions. Reports will be sent to the Asset Maintenance/ Housing Capital Teams for action and / or recording.

5.3 Action following Legionella Sampling

The following guidance is extracted from HSE AcoP L8 Table 4:

Legionella Bacteria (cfu/ml)	Action required	
Less than 100	None specifically required	
Over 100 but less than 1,000	Either: (a) If only one or two samples are positive, system should be resampled. If a similar count is found again, a review of the control measures and risk assessment should be carried out to identify any remedial actions (b) If the majority of samples are positive, the system may be colonised, albeit at a low level, with legionella. Disinfection of the system should be considered but an immediate review of control measures and risk assessment should be carried out to identify any other remedial action required.	
Over 1,000	The system should be re-sampled and an immediate review of the control measures and risk assessment carried out to identify any remedial actions, including possible disinfection of the system.	

6 Maintenance of Records

- 6.1 Asset Maintenance/Housing Capital will hold a database for each property containing the records stipulated in Paragraphs 66 69 of the ACoP, including:
 - a) Records of most recent Full Legionella Risk Assessment
 - b) Test results of samples from survey, if applicable
 - c) Any amendments made to water services since survey
 - d) Record of any remedial works

6.2 Site-Based Records

The Head of Establishment or Officer-in-charge will ensure the creation and maintenance of a site log book containing records of the actions for which he / she is responsible, as detailed in Table 3 of this policy. Such records should be completed by the occupier, contractor or other responsible person at the time the checks or work are undertaken.

7 Cleaning and Disinfecting Procedures

Cleaning and disinfecting of water supplies when necessary, following adverse results from testing of sample or alterations carried out to water services, will be carried out by approved Contractors in accordance with BS 6700 and the Standard Conditions, Practices and Procedures for Contractors (Appendix 3).

7.1 Minor Plumbing Alterations

Where small alterations or maintenance tasks on water systems have been carried out, then re-commissioning may require no more than thorough flushing of the systems. This can be followed by sampling and analysis of the water if considered necessary by the Supervising Officer, although this is not expected to be required after minor maintenance-related works such as replacement of individual water fittings. This relaxation is only permissible where the extent of the work is small (fewer than 6 fittings and less than 5 metres of new pipe per service, as a guide) and all fittings and pipe used on the installation are new and EITHER taken from the manufacturer's sealed packing just before use, OR pre-chlorinated immediately before use.

Pre-chlorination can be simply achieved by immersing and agitating the fittings for 5 minutes in a 1,000ppm solution of sodium hypochlorite. This can be made up on site by diluting commercial or household bleach (containing approximately 5% sodium hypochlorite) with clean cold water in the ratio of 1:50 (20ml bleach per litre of water). The COSHH Regulations apply to the use of such solutions at work – a Risk Assessment should be prepared by the Contractor and the appropriate physical precautions must be taken.

To avoid the need to disinfect large systems following relatively minor extensions and alterations, it is recommended that biocide injection points are provided at the point where the new pipework joins the existing system. Biocide injection points take the form of valves, tees and a drain valve or physically removable section of pipe. This enables biocide to be injected into the new section of pipework and circulated or drawn through all new fittings. The removable section must be taken out or the drain valve locked open to prevent any possibility of biocide (a Class 5 fluid) from contaminating the existing fresh water pipework during the disinfection process.

Work should only be undertaken by properly trained, experienced and qualified operatives or Contractors.

7.2 Major Plumbing Alterations

On larger installations or where fittings have been re-used and are not new and sealed, the new or altered section of pipework must be cleaned and disinfected by a specialist Contractor using an approved biocide, in accordance with BS 6700 and / or Appendix 3, followed by sampling and analysis.

Major extensions and new buildings must be disinfected before being brought into use, and in many cases it may be more convenient for a specialist Contractor to disinfect the entire buildings systems from the tank or source, in accordance with Appendix 3.

Notification must be made to the Water Undertaker (Severn Trent throughout most of Worcestershire) in accordance with the Water Supply (Water Fittings) Regulations 1999. Work should only be undertaken by properly trained, experienced and qualified operatives or Contractors who are accredited under a quality assurance scheme for plumbers (Severn Trent 'Watermark' scheme or equivalent).

7.3 **Certification**

In accordance with standard conditions of contract, the following Certificates should be obtained from the Contractor before new or significantly altered water systems are accepted at hand-over:

Certificate of Disinfection in accordance with BS 6700

Results of water analysis from UKAS-accredited Laboratory.

7.4 Empty Housing Stock

Housing stock, standing empty for any period of time will give rise to situations where water systems stagnate and become contaminated. Housing remaining empty for long periods should be drained down (where appropriate), not only as a precaution against stagnated water but risk management from frost damage or vandalism. When re-commission/ letting the housing stock,

- 1. Carry out assessment of the water system and take as necessary steps to comply with the requirements as detailed in appendix 5.
- 2. Water system shall be thoroughly flushed. Shower heads to be cleaned as detailed in appendix 6
- 3. Carry out sampling and analysis of the water if considered necessary by the Supervising Officer, although this is not expected to be required unless significant changes to the water system as covered by 7.1.

Notes from the Water Supply (Water Fittings) Regulations 1999 on notifications to Water Suppliers.

NOTIFICATIONS

Under the Water Supply (Water Fittings) Regulations 1999 if any of the following are to be done or installed, the Water Undertaking must be notified before commencing the work:

Erection of a building or other structure

Extension or alteration of a water system (other than in a dwelling)

Change of premises use

Installation of any of the following, other than as a like-for-like replacement:

- Bath of over 230 litres capacity
- Bidet
- Shower unit of a specified type
- Pump or booster
- Reverse osmosis unit
- Water treatment unit
- RPZ valve or other mechanical device (category 4 or 5 fluids)
- Garden watering system
- Water system laid outside a building

Construction of a pond or swimming pool

The Water Undertaking has 10 days to grant or withhold consent and/or impose conditions. After 10 days have expired and nothing has been heard, consent is deemed to have been given. Approved contractors (members of 'Watermark' or similar approval schemes) are exempt from certain of the above, but on completion of the work they must send a copy of the Contractors Certificate to the Water Undertaking.

8 Management of Works

8.1 Strategy

Following receipt of the Full Legionella Risk Assessment, review or report from Maintenance Contractors, a scrutiny will be carried out by the Water Management Officer. This scrutiny will be recorded on the database together with the actions taken or proposed.

Proposals for remedial works will be prepared in conjunction with the appropriate Head of Service and or appropriate officers

8.2 **Emergency Procedure**

All staff at Redditch Borough Council should be aware of the risk from contaminated water services. Any member of staff identifying a possible risk of contamination must contact their supervisor immediately who will contact Asset Maintenance/ Housing Capital Team. The first point of contact should be Water Management Officer

If contamination of potable (drinking) water by pathogenic or harmful substances is suspected, all supply points should be labelled as unfit for drinking and a supply of bottled water obtained and used until the supply is checked and cleared by Asset Maintenance/ Housing Capital. Legionella contamination is not normally an issue for potable supplies, other causes for concern being more frequent / relevant.

If contamination of stored water or hot water system is suspected, showers and baths should be taken out of use until checked and cleared by Asset Maintenance/ Housing Capital teams

8.3 Action in the Event of an Outbreak of Legionellosis

Detailed procedures are given in HSE ACoP L8, Appendix 2. Members of the Asset Maintenance/ Housing Capital Teams will co-operate with any investigation undertaken by a properly constituted authority.

A copy of the relevant Clauses in the ACoP is attached to this policy as Appendix 7.

9 Air Conditioning and Mechanical Ventilation

Air conditioning and mechanical ventilation plant can create conditions in which legionella bacteria can multiply. The following operational recommendations are based on NHS Estates Health Technical Memorandum 2025, which is acknowledged to represent the best available guidance in this field.

9.1 **General**

Air conditioning and ventilation plant and ductwork should be inspected to see that it is clean and to report on its general condition. After several years in service, even in the case of a correctly filtered plant, there may be signs of dirt accumulation, and consideration should be given to cleansing the system. Accumulation of dirt in a relatively short period is indicative either of a failure of the filtration system or that the wrong filters are being used. In particularly polluted areas, it may be appropriate to consider the installation of a higher grade of filter as well as a pre-filter. The quality of

filter housing and, in particular the seals is a critical factor in maintaining the efficacy of the filtration system by ensuring that air does not bypass the filter panels.

9.2 Fresh Air Inlet

In the case of existing installations the use of portable smoke generators or smoke bombs may be helpful in visualising the discharge plume from cooling towers and discharges from extract systems in order to assess any potential risk.

9.3 Cooling / Chiller Coils

Cooling / chiller coils precipitate water by condensing the vapour present in the air. This will occur during 'sensible' cooling as well as during dehumidification. It is good practice to fit downstream eliminator plates. Consideration should be given to installing downstream eliminator plates in existing plant.

9.4 Humidifiers

If the humidifier is not to be used for an appreciable period of time, it and any break tank should be drained down, either manually or automatically, and left empty. Existing capillary cell humidifiers or systems which rely on recirculated water, for example spray coil systems, should be taken out of service or replaced.

The cleanliness of the water supply and the effectiveness of any water treatment regimen should be regularly checked to a procedure agreed by the infection control team. The addition of treatment chemicals for continuous control of water quality for humidifiers / air handling units should be avoided. Consideration could be given to installing a UV system to control microbiological growth. UV systems, however, rely on high quality filtration to ensure the effective exposure of micro-organisms to the UV irradiation. The performance of the filter and the UV detection system should be regularly checked.

Internal surfaces likely to be wetted should be regularly inspected. In the event of fouling, specialist cleaning may be necessary.

Providing the water supply is suitable, existing spinning disc humidifiers may be retained in service. Spinning disc humidifiers are known to present a considerable risk of causing humidifier fever once contaminated, and require to be kept clean and well maintained.

The frequencies utilised in ultrasonic humidifiers cannot be considered as effective for the control of micro-organisms. The supply of water to the humidifier should be free from viable bacteria. Regular inspection and cleaning is required.

There should be a clear statement of the microbiological and chemical COSHH assessment of the operation of all humidifiers, water treatment regimens and monitoring procedures.

The procedures should be detailed in both the operating and maintenance manuals produced for each plant.

9.5 **Drainage Traps**

Plant condensate drainage traps, where fitted, should be checked monthly to ensure that the water level is correct.

9.6 **Design of Air Conditioning and Mechanical Ventilation Systems**

The definitive design guidance for air handling and air conditioning plant and systems is NHS Estates Health Technical Memorandum 2025. Although such high standards are generally not applicable outside the Health Care Sector, they do represent the best practice. Appendix 8 is an extract from NHS Estates Guidance which summarises the requirements which will be applicable to Redditch Borough Council premises.

Schedule of Redditch Borough Council Properties

LIST PRIORITY	RISK	FACTOR	TYPE OF PREMISES OR SYSTEMS
A	Increased		Homes for Older People Residential Premises Hostels and Group Homes Day Centres for Older People Homes for Mentally III People Outdoor Education Centres Sport & Leisure Centres Foot ball Changing Rooms Countryside Centre/ Youth afloat
В	Standard (Non-Educa	ation)	Offices (larger/complex systems) Community Centres Youth Centres Theatre Void Housing stock
С	Low		Crematorium Offices (smaller) Industrial Units Housing stock

Water Sampling for Legionella and Other Bacteriological Testing

General guidance

Samples should be taken as follows if indicated:

- a) Cold water system from the cold water storage cistern or from the stored water outlet nearest to the cistern from which the outlet is supplied and the furthest outlet from the cistern.
 Samples may also be required from outlets in areas of particular concern, eg kitchen taps, aerosol-producing outlets such as showers, outlets off long pipe runs, etc.
- b) Hot water systems from calorifier outlet or nearest tap to the calorifier outlet plus the return supply to the calorifier or nearest tap to that return supply. Samples should also be taken if possible from the base of the calorifier where drain valves have been fitted. The furthest outlet from the calorifier should also be sampled.

The complexity of the system needs to be taken into account in determining the number of samples to take. For example if there is more than one ring main present in the building, taps on each ring will need to be sampled. In order to be representative of the system as a whole, samples should be of treated circulating water and not taken from temporarily stored water, eg a TMV controlled taps and showers. These may require sampling but this should be determined by risk assessment.

Water samples taken from cold water rising mains

Ensure tap is direct from rising main and not passing through a water softener or inline filter. Where possible, select a metal tap that is clean and that the washer or gland is not leaking. If possible select a tap without an anti-splash device. Sample in the manner specified by Severn Trent Water, OGC, PHLS, British Standards or other competent authority according to the analysis to be done.

Water sample taken from stored water system (hot or cold, mains or tank fed)

Establish that the supply is actually from a storage cistern or vessel, and that the outlet is likely to be representative of all such outlets. Where possible select a metal tap that is clean and that the washer or gland is not leaking. If possible select a tap without an anti-splash device. Sample in the manner specified by, Severn Trent Water, OGC, PHLS, British Standards or other competent authority according to the analysis to be done.

Sampling from a water storage cistern (directly)

Carefully remove access lid, wearing disposable gloves and use a sterile dipper to dip the cistern and fill an appropriate sample bottle. Do not fill sample bottle over cistern access to prevent contamination of cistern by inadvertently dropping cap or bottle into cistern.

Sampling from showers

Select a suitably representative shower. Sample in the manner specified by Severn Trent Water, OGC, PHLS, British Standards or other competent authority according to the analysis to be done. If contamination of the shower mixer, hose or spray head is suspected or is to be investigated, samples should be taken without first flushing the shower, taking normal precautions against contamination.

Identification and Transportation

Label each sample bottle as it is taken with site location for sampling point, date, time, temperature and sampler's name. Samples should be placed in a cool box or refrigerated container as necessary and transported to the analysing laboratory within 12 hours.

Redditch Borough Council

Standard Conditions, Practices and Procedures for Contractors engaged in cleaning and/or disinfection of water systems using stabilised CHLORINE DIOXIDE for and on behalf of Redditch Borough Council Asset Maintenance Team/ Capital Team

(1) General

- (a) The disinfection of water systems using chlorine dioxide must be carried out in compliance with the following conditions, practices and procedures. Any deviations from these conditions, practices and procedures must be agreed in writing with Asset Maintenance/ Capital Team before they can be implemented.
- (b) Prior to the commencement of all work the contractor must contact Asset
 Maintnenance/ Capital Team. Adequate notice of the proposed starting date must be
 given in order to ensure all arrangements necessary for each type of property can be
 made.
- (d) The contractor must ensure all staff working on the water supply will have received adequate training in respect of health and hygiene, cleaning and water treatment and this standard of training must be to the satisfaction of Asset Maintenance/Capital Team. At no time should any operative, who is suspected of, or is suffering from any infectious disease be permitted to work on the water supply until satisfactory medical clearance has been obtained.
- (e) Any special arrangements required by each property will be co-ordinated through Asset maintenance/ Capital Team, each contractor will be expected to adhere strictly to those requirements prior to the commencement of, and throughout any contract.
- (f) All inspections and on-site analysis will be carried out by or under the direction of staff from Asset Maintenance/ Capital Team. This will include all chlorine dioxide (Purogene) testing together with other necessary testing. Testing must be to acceptable standard methods.
- (g) During the cleaning and disinfecting operation, all contractors and their staff must comply with any operational and safety requirements (within the terms of the contract) requested by the member of staff on the site from Asset Maintenance/ Capital Team
- (h) The contractor must ensure that all staff are fully equipped and trained in accordance with the Health and Safety at Work Act 1974 and appropriate Codes of Practice. At no time must the contractor or his staff put other occupants of the building or employees at risk through non-compliance with the Health and Safety at Work Act1974 or any other regulations eg COSHH regulations etc.
- (i) The product "Purogene" will be used within the shelf life given to the product and in accordance with the manufacturer's recommendations.
- (j) Prior to the commencement of any contract, if pumping and discharging pipes are required, all this equipment must be fully cleansed and disinfected. On no account must this equipment have been used for any purpose other than potable water.
- (k) All waste water from the holding cisterns, vessels etc, must be discharged in a continuous pipe leading directly to the foul water drainage system. Care must be taken not to allow splashing or aerosol creation by the water.

- (I) All scale, rust, deposit and sludge must be suitably bagged in water-tight sacks and suitably disposed of at an approved waste disposal site. Records of such disposals must be available for inspection.
- (m) During the re-filling of the water cisterns/vessels, all equipment used, if via hydrant or holding cistern must be pre-disinfected to the approved standards. Approval to use any hydrant must be obtained from the Water Company.
- (n) The Contractor and his staff must ensure that the highest standard of hygiene precautions are taken during the final re-filling operation.
- (o) All lids and covers must be washed and disinfected prior to refitting.
- (p) Where any de-scaling of cisterns etc or calorifiers has been carried out, checks should have been made by the contractor to ensure that no immediate damage to the fabric of the cistern or calorifier has been made that would lead to leakage.
- (q) Prior to the contractor leaving the premises a final clearance certificate must be left with the person in charge of the premises, as to completion of the contract work and clearance of the water supply of all disinfectant.
- (r) All shower heads, spray taps and other tap outlets must be de-scaled and cleansed where necessary, and disinfected.
- (s) Following the cleaning and disinfection, bacteriological and chemical samples will be taken at agreed locations. These are to be analysed for all bacteriological and chemical parameters deemed necessary.
- (t) All sampling and testing is to be carried out in accordance with UKAS accreditation procedures where such exist, by a UKAS accredited laboratory.

2) Disinfection of the System

- (a) Prior to the commencement of the disinfection of the system all cisterns/vessels must be isolated from the main feed to the water distribution system.
- (b) An inspection of the system will dictate the sequence of operations in the cleaning and disinfection procedure.
- (c) If the inspection indicates a near absence of deposits in the vessels or cisterns and/or that the deposit will not be stirred up and distributed through the system during the operations laid down below, the following procedure will be adopted.
- (d) The water in the cisterns/vessels must be treated to a minimum of 60mg per litre of available chlorine dioxide.
- (e) This water must then be used to charge the distribution system to a minimum level of 60mg per litre of available chlorine dioxide at all outlets hot and cold. The whole system must be allowed to stand charged for a minimum period of 1 hour, during this period tests must be carried out every 20 minutes throughout the distribution system to ensure that the minimum level of 50mg per litre of chlorine dioxide has been maintained. All test and sampling points must be identified and the results of each test recorded. Systems with a large distribution network may require the cisterns refilling and treating several times to cope with water quantity needed.

- (f) Following the charging of the system, the vessels and cisterns will be cleaned as follows:-
 - (1) All cisterns/vessels must be isolated from the feed to the distribution system.
 - (2) The remaining water/disinfectant in the cistern/vessel must be emptied via a pumped system and discharged to a suitable foul water drainage system.
 - (3) All cisterns/vessels including floats and float operated valves must be thoroughly cleansed, using a brush method etc, to remove all scale, slime and deposits as is reasonably possible. All debris, scale, rust etc to be collected into water-tight plastic bags or and disposed of at an approved disposal site. At no time must a cleaning method be used that will cause an aerosol transmission. Following this operation the cistern must be thoroughly rinsed with cold mains water.
 - (4) All remaining water must be removed from the vessel/cistern by means of a wet vacuum cleaner and discharged to a foul water drainage system, if necessary repeating several times until water is clear.
 - (5) The cistern will be disinfected by spraying or wiping with an active disinfectant solution of 500mg/L of available chlorine dioxide. The spraying will include the cistern lids, floats and float operated valves etc. Instructions for the preparation of the disinfection solution are to be found at (5) below.
 - (6) Spray or wipe all internal surfaces of the vessel/cistern with disinfectant solution. Surfaces must be wetted for a minimum of 10 minutes.
 - Active disinfectant solutions may be mildly irritating when in prolonged contact with skin, suitable protection eg gloves/safety glasses must be used when preparing solutions and when in use. Suitable breathing apparatus should be used in areas with inadequate ventilation when spraying or fogging takes place.
 - (7) Following the above procedures the vessel/cistern must be refilled with clean mains water the whole system flushed and rinsed until an available chlorine dioxide level of 1 milligramme per litre or less has been obtained throughout every outlet or user point.
- (g) An alternative post-clean cistern disinfection procedure is as follows:-
 - (1) After isolation the clean cisterns/vessels will be refilled and will then be charged to the minimum level of 60mg/L of available chlorine dioxide. These must be allowed to stand for a minimum period of 1 hour, during which time, tests will be carried out to ensure that the minimum level of 50mg/L of available chlorine dioxide is maintained. After this time the treated water must be pumped directly to a foul water drain and cisterns/vessels flushed with clean mains water several times and again pumped directly to waste.
 - (2) The cisterns/vessels are then filled to a normal working level with clean mains water.
 - (3) When the cisterns have been filled, all outlets of the distribution system must be opened, together with outlet valves to all cisterns/vessels and the system completely flushed to remove the disinfectant to a maximum level of 1mg/L chlorine dioxide.

On-site tests must be carried out throughout the distribution system to ensure that the water left within the system following the cleaning and/or disinfection will be of the same standard of that of the incoming mains water supply. All

disinfectant used must have been removed to a maximum level of 1mg/L chlorine dioxide.

- (h) If the initial inspection indicates an excessive amount of deposit in the vessel/cistern, the following procedure is to be adopted for cleaning and disinfection:
 - (1) The vessel/cistern must be isolated from the feed to the distribution system and emptied via a pumped system with the deposit removed by a "wet" vacuum cleaner. The cistern is cleaned and any further deposit removed by the "wet" vacuum system. The cistern is then flushed with clean water several times (until the water is clear) and the resulting water pumped directly to a foul water drain.
 - (2) If the contents of the cistern were found to be stagnant, otherwise suspect, the water should be disinfected (60mg/L of available chlorine dioxide for 1 hour) before the cistern is emptied.
 - (3) The cistern may be disinfected by spraying (as at (2) (f) (s).
 - (4) The cistern is then charged with water and Purogene added to a minimum level of 60mg/L of available chlorine dioxide.
 - (5) The distribution system is charged with treated water as per (2) (e) above, with both cistern and system allowed to stand for a minimum of 1 hour.
 - (6) If the cistern has not been disinfected by spraying, it must be filled to the normal working maximum level with treated water and allowed to stand for a minimum of 1 hour as per (2) (e) above.
 - (7) The whole system is then flushed with clean mains water as per (2) (g) (3) above as that clean mains water is present throughout the system.

(3) Calorifiers

- (a) Where de-scaling and cleaning is required, first raise the temperature to a minimum of 70°C over the whole surface of the calorifier for at least one hour, with the flow valves closed in order to obtain pasteurisation.
- (b) Following the above, drain, clean and de-scale ensuring all sludge in the base is removed (with sufficient flushing to ensure complete removal of sludge and discoloured water). The sludge is to be bagged in water-tight containers and disposed of to a suitable disposal site. Following this operation allow the surface of the calorifier to dry.
- (c) When dry, refill, ensuring that all air has been removed. Raise the temperature to a minimum of 70°C for 1 hour. Before returning the calorifier to service, open the header valves slowly in order to reduce the risk of turbulence. Return the calorifier to its normal working temperature and draw the water through the distribution system until the correct distribution temperature has been obtained. During this procedure, all safety precautions must be taken to prevent the risk of scalding to the occupants of the building.

(4) Sprinkler, Water Cooling Towers and Air Conditioning Units

Where these are in place, any special arrangements and methods for treatment if required will be given prior to commencement of the contract for each building and details will be included in the particular specification.

(5) Solution for disinfection of Cisterns/Vessels by Spraying

Preparation of 500mg/L available Chlorine Dioxide Solution (advocated).

Place 125ml of Purogene in a clean plastic bucket then add 12.5 grams of citric acid. Prepare in a well ventilated area, avoiding breathing in any fumes. Wait 5 minutes for activation to take place and the crystals to dissolve completely. Dilute with 5 litres of potable water (gives 500 ppm available chlorine dioxide) for use.

THE CONTROL OF LEGIONELLOSIS

A RECOMMENDED CODE OF CONDUCT FOR SERVICE PROVIDERS

Legislative requirements for the control of legionellosis put the responsibility for compliance clearly with the owner/operator of water systems. Under the Health and Safety at Work etc Act 1974 and the Control of Substances Hazardous to Health Regulations 1994 as regards risks from legionellosis, all owner and operators of such systems have a responsibility to ensure that the risk is minimised and kept to an acceptable level. The HSC's Approved Code of Practice stresses that whilst the tasks required to be undertaken to minimise the risk may be contracted to an external specialist, the owner/operator must take all reasonable care to ensure the competence of the service provider to carry out the work on his behalf.

This Code of Conduct is intended to give guidance alone, on the standard of service that a Client should expect from those Service Providers who agree to abide by the Code. The responsibility for the prevention and control of legionellosis lies with the Client and the Service Provider.

The guidelines outlined in this document have been designed to help owner/operators select a competent service provider by highlighting six critical areas and detailing the commitment that the owner/operator should expect from prospective service providers when making the competence assessment.

A copy of the code of conduct

Produced jointly by the
British Association for Chemical Specialities
and the
Water Management Society

Conditions of Compliance

- (1) There should be a clearly defined written agreement between the service provider* and the client* setting out the individual responsibilities of both parties to ensure compliance with current legislation.
- (2) Service Providers should demonstrate and document a satisfactory level of competence of their staff* in order to achieve the objectives of this document.
- (3) The recommendations made by the service provider should be equal to, or better than, the relevant Codes of Practice and guidance documents pertaining to the system in question (see attached list).
- (4) Lines of communication and reporting between client and service provider should be defined as well as the management plan in the event of remedial or corrective action being required, including matters of evident concern outside contracted obligations.
- (5) Adequate and up to date monitoring and treatment records should be kept. These should be readily available.
- (6) The performance of the control measures should be reviewed jointly by the service provider and the client at least annually and the necessary remedial action plan agreed.

Definitions *

SERVICE PROVIDER

Companies or individuals or their sub-contractors who are involved with providing:- advice, consultancy, operating, maintenance and management services or the supply of equipment or chemicals to the Client.

CLIENT

The owner or occupier of the premises, or his appointed representative, or other person nominated to be the "Responsible Person" as defined in HSC document. "The control of Legionella bacteria in water systems" Approved Code of Practice L8 (2000) paragraphs 23 and 39.aphs 8 and 17.

STAFF

Any person directly or indirectly employed in meeting the requirements of this document.

Service Provider Commitments

1. Allocation of responsibilities:

The service provider will:

- explain in detail the client's obligations under the legionellosis legislation.
- identify those services covered by the contract and those which should be provided by the client to meet all current obligations.
- formalise an agreement detailing the respective responsibilities for each requirement.

2. Training and competence of personnel:

The service provider will:

- supply details of the training that is provided to his personnel associated with the control of legionellosis.
- indicate how personnel competence is assessed, training needs are established, and what measures are taken to ensure that personnel are kept up to date with best practice procedures.
- assist the client to assess and meet the training needs of the client's staff.

3. Control measures:

The service provider will:

- indicate how the design, monitoring and maintenance of an appropriate programme of control measures is assessed.
- show how his company would audit preventive and corrective actions.

4. Communication and management:

The service provider will:

- detail the management systems which operate if the control programme deviates from specifications, e.g. a positive legionella result, and show how these are audited.
- indicate how his management team would communicate with the client's team in the even of any necessary actions.
- also bring to his client's attention any significant matters affecting the control of legionellosis of which he has become aware, beyond the responsibilities of his contract.

5. Record keeping:

The service provider will:

- indicate which records should be kept by both parties and where they will be kept.
- establish with the client who will be responsible for the maintenance of these records.

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The service provider will:

 recommend a programme that will allow both parties to review formally all aspects of the agreement covering system management and the control of legionellosis.

In each instance the service provider will provide corroboration if requested to do so.

It is a condition of compliance with this Code of Conduct that the service provider supplies a copy of the Code to every client, together with a copy of the Registration Certificate

In the event that the client believes that a service provider has not complied with the Code of Conduct, he may write, with full details, to: Code of Conduct Secretariat, Mill House, Tolson's Mill, Fazeley, Tamworth, Staffs, B78 3QB

APPENDIX 5

SYSTEM DESIGN STANDARDS FOR HOT AND COLD WATER

Cold Water

Storage temperature: 20°C (maximum)

Storage capacity: 4 hours (where necessary)

24 hours (maximum)

Avoid installing cisterns if possible

Distribution temperature: 20°C (maximum)

Domestic Hot Water

Storage temperature: 60°C (minimum)

65°C (maximum)

Distribution temperature: 50°C (minimum)

DHWS Distribution Pipework

Maximum length of:

Spur - 5 metres

Dead leg / blind end - 5 pipe diameters

Blended pipework – 2 metres

Distances are measured from the circulating main to the point of draw-off, and INCLUDE any length of blended pipework, shower hose, etc.

Pumps

Secondary circulation - single pump, in return leg

provide 'dry' standby adjacent use electrical plug and socket

Anti-stratification - shall run for one hour per 24 hours

- must only run in times of low or no demand

- primary heat source to be 'on' during pump run period

Appendix 1

Distribution System Layout

Design temperature drop: 5K (maximum)

Hydraulic balancing: avoid multiple parallel loops, aim for 'single pipe' with short return leg

General

Avoid tank-fed systems if possible; use mains pressure

Select direct gas-fired water heaters in preference to calorifiers

Select electric mains-fed unvented point-of-use water heaters for small systems, but control to limit electrical maximum demand.

Avoid concealed pipework, cisterns and components and observe the requirements of the Water Regulations.

Spray taps are not to be specified.

Temperature Sensor Positions on New/Refurbished Projects

Include BEMS temperature sensors in:

- Incoming mains CWS downstream of stop valve
- Cold water feed into calorifiers or water heaters
- Cold water storage tanks
- HWS flow from calorifier or water heater
- HWS return to calorifier or water heater

Install dial-pattern thermometer in storage cisterns.

Where BEMS is not installed, provide 100mm dial thermometers in the above locations to permit manual observation.

APPENDIX 6

REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

Advice to building occupiers concerning regular flushing of showers

The statutory requirement relating to the above is the Health and Safety Commission's Approved Code of Practice L8 'Legionnaire's Disease - The control of legionella bacteria in water systems' which states as follows:

- "...consideration should be given to removing infrequently used showers..." (Clause 164)
- "... When outlets are not in regular use, weekly flushing of these devices for several minutes can significantly reduce the number of legionella discharged from the outlet. Once started, this procedure has to be sustained and logged..." (Clause 165)

"Where it is difficult to carry out weekly flushing, the stagnant and potentially contaminated water from the shower and associated dead-leg needs to be purged to drain before the appliance is used. It is important that this procedure is carried out with the minimum production of aerosols, eg. additional piping may be used to purge contaminated water to drain." (Clause 166)

Practical measures

Showers which are used less than once a week should strictly be considered as un-necessary, and be disconnected and removed in accordance with the Approved Code of Practice Clause 164.

If showers are required to remain installed for occasional use, it is important that the occupier institutes a programme of weekly flushing. So long as showers are flushed weekly, there are no special safety requirements other than to turn the shower fully on and allow to run to drain for a few minutes (five minutes is a reasonable period). However, it is important to make a written record of the date, time and name of the person who carried out the procedure. This could be kept in a simple log book.

If a shower has been unused for more than a week, for example at the start of the football season, then the water inside it could potentially be contaminated. In such cases, however, it is a wise precaution to avoid the creation of an aerosol or excessive splashing.

With flexible shower hoses, the spray head could be lowered temporarily into a bucket placed on a stool, and the water run to drain that way without creating an aerosol. In the case of fixed high-level shower heads, the most simple and practical way of achieving safe flushing is to fabricate a length of rigid plastic piping, of the required length to suit the shower, fitted with a tundish at the upper end. The tundish is positioned underneath the shower head and the discharged water is conveyed safely into the shower tray/outlet without generating an aerosol. With careful selection of the length of the pipe, the system can be made self-supporting.

Cleaning shower heads

This is no different to a shower in a domestic residence, with which most people are familiar and capable of keeping clean. Over time, scale may build up on the outlet plate but this can be removed by regular cleaning or scrubbing, or the use of a proprietary chemical descaler where a prolonged build-up has been allowed to occur (the COSHH Regulations apply to use of this at work). Public buildings and Communal showers in sheltered accommodations covered by the Redditch Borough Council will receive a six-monthly service to all showers, which includes cleaning and descaling of all shower heads. Normal domestic cleaning during the intervening period should prevent undue build-up of scale.

APPENDIX 7

REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

Action in the Event of an Outbreak (Extracted from HSC AcoP L8)

- Legionnaires disease is not notifiable under public health legislation in England and Wales but, in Scotland, legionellosis (ie all diseased caused by legionella) is notifiable under the Public Health (Notification of Infectious Disease) (Scotland) Regulations 1988.
- An outbreak is defined by the Public Health Laboratory Service (PHLS) as two or more confirmed cases of legionellosis occurring in the same locality within a six month period. Location is defined in terms of the geographical proximity of the cases and requires a degree of judgment. It is the responsibility of the Proper Officer for the declaration of an outbreak. The Proper Officer is appointed by the Local Authority under public health legislation and is usually a Consultant in Communicable Disease Control (CCDC). In Scotland it is the Consultant in Public Health Medicine (CPHM) employed by the Health Board and acting as Designated Medical Officer for the Local Authority.
- Local Authorities will have established incident plans to investigate major outbreaks of infectious disease including legionellosis. These are activated by the Proper Officer who involves an Outbreak Committee, whose primary purposes is to protect public health and prevent further infection. This will normally be set up to manage the incident and will involve representatives of all the agencies involved. HSE or the Local Authority EHO may be involved in the investigation of outbreaks, their aim being to pursue compliance with health and safety legislation.
- The Local Authority, CCDC, or EHO acting on their behalf (often with the relevant Officer from the enforcing authorities either HSE or the Local Authority) may make a site visit.
- As part of the outbreak investigation and control, the following requests and recommendations may be made by the enforcing Authority.
 - (a) To shut down any processes which are capable of generating and disseminating airborne water droplets and keep them shut down until sampling procedures and any remedial cleaning or other work has been done. Final clearance to restart the system may be required.
 - (b) To take water samples (see paragraphs 124 131, Part 2) from the system before any emergency disinfection being undertaken. This will help the investigation of the cause of the illness. The investigating Officers from the Local Authority/ies may take samples or require them to be taken.
 - (c) To provide staff health records to discern whether there are any further undiagnosed cases of illness, and to help prepare case histories of the people affected.

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Appendix 1

- (d) To co-operate fully in an investigation of any plant that may be suspected of being involved in the cause of the outbreak. This may involve, for example:
 - (i) tracing of all pipework runs;
 - (ii) detailed scrutiny of all operational records;
 - (iii) statements from plant operatives and managers;
 - (iv) statements from water treatment contractors or consultants.
- Any infringement of relevant legislation may be subject to a formal investigation by the enforcing Authority.

APPENDIX 8

REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

Design Guidance for Air Conditioning and Mechanical Ventilation Systems

General

The design of the plant and selection of equipment within an air-conditioning or supply ventilation system should aim to minimise the distribution of excess moisture within the ductwork. The installation, and in particular the plant room layout, should provide adequate access to items of plant for inspection and, when necessary, for affecting a cleansing regimen as part of the plant maintenance programme.

All materials used in the construction of cooling coils / chiller batteries and humidifiers should withstand bio-degradation; this applies in particular to surface finishes, mastics, gaskets, insulation, etc. Natural fibrous material should not be used.

Fresh Air Inlet

The fresh air supply inlet(s) must be located to avoid the possibility of air being carried over from evaporative cooling towers or being discharged from other extract systems and drawn into the system.

Cooling / Chillers Coils

The cooling coils / batteries and their components should be designed to allow regular cleaning.

Humidifiers

The cleanliness of the water supply is essential for the safe operation of humidifiers. Provision should be made for draining down supply pipework and break tanks for periodic disinfection and for periods when they are not required in service. Water supply should be potable quality from a rising main.

The addition of treatment chemicals for continuous control of water quality for humidifier / air handling units should be avoided. Consideration could be given to installing a UV system to control microbiological growth. Given the limitations of UV systems, however, this will require filtration to high quality to ensure the effectiveness of exposure of organisms to the UV irradiation. As with all water treatment systems the unit should be of proved efficacy and incorporate UV monitors so that any loss of transmission can be detected.

Overriding controls separate from the normal plant humidistat should be installed. Their purpose is to prevent excessive condensation when starting up. A time delay should be incorporated into the humidifier control system such that the humidifier does bit start until 30 minutes after the ventilation / plant start-up. In addition, a high limit humidistat should be installed to switch off the humidifier when the saturation reaches 70%. This humidistat is to control added moisture, it is not necessary to install a dehumidifier to reduce the humidity of the incoming air if it already exceeds 70%. The normal humidifier control system should ensure that the humidifier is switched off when the fan is not running.

Steam Humidifiers (Electric or Gas Fired)

The humidifier lance design should prevent steam impinging onto the side(s) of the duct, condensing and generating excess moisture. Water supply should be taken from a rising main with short pipe runs to minimise stagnation.

System Drainage

It is essential that cooling coils / humidifiers, fan scrolls (when necessary), eliminators and heat recovery systems are at a sufficient height from the floor to permit the installation of drainage pipework systems with access for maintenance.

Each device should have its own drainage trap.

A drainage / drip tray should be provided, to collect condensation on cooling coils (including the return bends and headers), and for humidifiers, eliminators and, if necessary, heat recovery devices. The drainage /drip tray should be constructed of a non-corrodible material and be so arranged that it will completely drain. To prevent 'ponding' it is essential that the drain outlet should not have an upstand. The tray should be large enough to trap all the water produced by the device. Provision should be made for easy inspection of the tray. Any jointing material used to seal the tray to the duct must not be of a type that will support microbial growth, (the Water Fittings Directory lists suitable materials). A slope of approximately 1 in 20 in all directions should be incorporated to the drain outlet position.

Drainage / drip trays should be connected to a drainage trap assembly that should discharge via a Type A air gap as laid down in BS 6281: Part 1: 1988. The depth of any trap should be at least twice the static pressure head generated by the fan so that the water seal is not 'blown out' during plant start-up. (See Figure 5, typical air-conditioning plant drain).

A trap need not be directly under the drainage tray if the pipework connecting the two has a continuous fall. Each trap must be of the transparent type to show (visibly the integrity of the water seal, and should be provided with a means for filling. Permanent markers on each trap should be provided to show the water seal levels when the system fan is running at its design duty. Each installation should incorporate quick release couplings to simplify removal of the traps.

If trace heating of drainage traps is necessary to provide frost protection, insulation should not be fitted, otherwise the trap will be obscured from view.

The pipework should have a minimum fall of 1 in 60 in the direction of flow. (Transparent pipework is not necessary). Water from each trap should discharge over either an open tundish connected to a drainage stack via second trap, or a floor gully (or channel). Where the drainage pipework from the tundish outlet, which should be ventilated, discharges into a surface water drainage stack or a dedicated plant drainage stack, the connection must be via an easy swept tee.

It will be necessary to disinfect humidifiers / cooling coils etc; thus it is preferable to discharge plant drains into the foul drainage system. The surface water drainage system may be used, for example when a plant is installed on the roof, but if chemicals are used during cleaning operations it will be necessary to discharge the effluent to the foul drainage system, for example by use of a hose.

The drainage system should be constructed of a corrosion resistant material. It should be capable of removing all the moisture produced, for example during periods of maximum dehumidification load and in the event of full discharge from the humidifier during fan failure, and provide a means of safely disposing of the water via an independent drain. Drainage / drip trays for coils should be provided with a means to prevent air by-passing the coil (for example by the inclusion of suitable baffle arrangements).

APPENDIX 9

REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

WRITTEN SCHEME FOR CONTROLLING THE RISK OF EXPOSURE TO LEGIONELLA BACTERIA IN REDDITCH BOROUGHCOUNCIL PREMISES

The following written scheme is issued in accordance with HSC Approved Code of Practice L8, and contains a summary of the requirements of the Redditch Borough Councils Water Quality Policy, 2009, to which reference should also be made.

(a) Schematic Diagram

The schematic diagram for the particular premises is contained in the Water Services Log Book, located at the premises. A further copy is held by the Asset maintenance Team/ Housing Capital team

(b) Description of correct and safe operation of systems

The water services systems at the premises operate under the following conditions of temperature:

Cold water storage cisterns: below 20°C

Hot water storage: 60–65°C Hot water distribution: 60–65°C

Hot water service return: 50°C or above

Hot water to be heated to 60–65°C before first draw-off takes place All outlets to be flushed weekly unless used more frequently Hot water outlets with blending valves set to 41-46°C as appropriate

(c) Precautions to be taken

Design and construction of new systems and alterations to be in accordance with HSC ACoP L8, BS6700, WCC Water Quality Policy and WCC Standard Mechanical Technical Clauses/Trade Preambles appropriate to the contract.

New and modified pipework to be disinfected and sampled as per BS6700 and WCC Water Quality Policy.

Hot water outlets which pose a scalding risk to be fitted with thermostatic mixing valves within 2 metres of point of draw-off.

Showers and outlets shall be flushed in a manner that removes the possibility of creating an aerosol. With flexible shower hoses, the spray head should be lowered temporarily into a bucket placed on a stool, and the water run to drain that way without creating an aerosol. In the case of fixed high-level shower heads, the most simple and practical way of achieving safe flushing is to fabricate a length of rigid plastic piping, of the required length to suit the shower, fitted with a tundish at the upper end. The tundish is positioned underneath the shower head and the discharged water is conveyed safely into the shower tray/outlet without generating an aerosol. With careful selection of the length of the pipe, the system can be made self-supporting.

(d) Checks to be carried out to ensure efficacy of scheme

Checks, their frequency and the persons responsible for carrying them out are in accordance with Table 1 of this document.

(e) Remedial actions to be taken

The expected results of the checks set out in Table 1, and the actions to be taken in the event of non-compliance, are listed below under the reference number for each check.

- (1) No reporting appropriate.
- (2) Temperature at blended outlets should be nominally 43°C but specifically in the range 39°C for bidets, 41-43°C for showers, washbasins and unattended baths, and 46°C for attended baths. Record discrepancies, call in Maintenance Contractor and request adjustment or replacement.
- (3) Temperatures at sentinel taps should be within range and times stated in Table 1. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (4) Temperatures at calorifiers should be within range stated in Table 1. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (5) If shower roses and hoses cannot be cleaned or descaled effectively, call in Maintenance Contractor and request replacement.
- (6) Temperatures at incoming main and storage tanks should be below 20°C in all cases. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (7) Cold water temperature rise should be less than 2-3°C under constant flow conditions. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (8) Water from calorifier drains should be clean and free from visible debris. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (9) Calorifiers should be clean internally and free from sludge or heavy scaling. Record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (10) Compare temperature of water from taps checked with original values measured at Risk Assessment. If any differ by more than 5 degrees or fall outside the control parameters in Table 1 (3) above, record discrepancies and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (11) Cold water storage cisterns should be serviced in accordance with the requirements of the Mechanical Maintenance Service Contract. Record work done and discrepancies, and report to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.
- (12) Report any discrepancies between the schematic drawing and the physical arrangements of water services found on site to Water Management Officer at Asset Maintenance/ Housing Capital, for investigation and remedial action.

Table 1

Frequency	Action	Responsibility		
1. Weekly	Flush little-used outlets to drain without release of aerosols. Record.	Occupier		
2. Weekly	Check and record blended water temperatures from thermostatic mixing valves where fitted. Confirm that stable temperature is attained within one minute.	Occupier (2) Occupier (2) Occupier (3) Occupier (1) Maintenance Contractor Occupier (4)		
3. Monthly	Check water temperatures at sentinel taps. Hot water >50°C after 1 minute, cold water <20°C after 2 minutes. Record.	Occupier (2)		
4. Monthly	Check calorifier temperatures. Flow 60°C, return >50°C. Record.	Occupier (3)		
5. Quarterly or as necessary	Dismantle, clean and descale shower heads and hoses. Record.	Occupier (1)		
6. Six monthly	Measure incoming water temperature to cold water cisterns and water temperature remote from float valve. Record.			
7. Six monthly (January and July)	Measure cold water temperature rise between incoming main and most distant outlet. Should be less than 2-3°C. Record.	Occupier (4)		
8. Annually	Take sample and record condition of water from HWS calorifier drains.	Maintenance Contractor		
9. Annually	Open and inspect internal surfaces of HWS calorifiers for scale and sludge and clean or descale as necessary. Record.	Maintenance Contractor		
10. Annually	Check and record temperatures at a representative number of taps throughout the system, on a rotational basis.	Occupier (2)		
11. Annually	Inspect cold water cisterns and carry out remedial work as necessary. Record work done and report outstanding defects.	Maintenance Contractor		
12. Annually	Physically inspect the hot and cold water systems and check accuracy of schematic drawings. Note changes. Check for under-used fittings and report recommendations.	Scientific Services and/or Specialist Contractors		

Notes

- 1) May be undertaken by competent Caretaker or maintenance operative using proprietary domestic kettle descaler (COSHH Regulations apply to use of chemicals at work), or by Maintenance Contractor. However, the person responsible must be clearly defined by the Occupier
- 2) Shall be done using a simple digital thermometer with immersion probe.
- 3) Readings to be taken from fitted temperature gauges.
- 4) Should be done using digital thermometer as in (2). Sample points can be the nearest tap to the incoming main, and the most distant tap. These points should be labelled permanently to identify them.
- 5) Water samples for analysis, where appropriate, are to be taken at the same time as the visual survey is undertaken. In addition samples will be taken at a greater frequency, to be agreed with Asset Maintenance where the water supply is obtained from a private source

Definitions and explanations

Sentinel tap: a 'sentinel' is a sentry who stands guard over something, watching and keeping an eye on safety, and the term is used to describe the taps which are used regularly to monitor, sample and check the water quality and temperature. Basically, the sentinel taps are defined as the first and last ones on the system. For the cold water, they will be the taps nearest to and furthest from the incoming cold water main, and for the hot water, they will be the nearest to and furthest from the hot water source, be it calorifier, tank, vessel or water heater. All buildings will have at least two cold and two hot sentinel taps, and they are usually easy to identify. For larger buildings, and campuses with several blocks, there may be more sentinel taps, which can be identified by reference to the water services schematic diagram for the site. Once identified and labelled, they will not change unless some major alterations are done to the water systems. Schematic diagrams are prepared when a formal Risk Assessment is undertaken

Calorifier: a calorifier is nothing more than an industrial-size version of the indirect domestic hot water cylinder found in houses. Calorifiers tend to be fitted in larger premises, whereas smaller properties often have point-of-use electric water heaters, which pose fewer risks. Calorifiers rely on thermal stratification where the hot water collects at the top and is drawn off for use. A pumped circulation main is often fitted in larger premises, and the returning slightly cooler water is injected back into the calorifier cylinder part way up. Cold feed water from a tank enters at the bottom. Close control and monitoring of the temperatures in and around the calorifier and pipework is necessary to ensure that water is heated to and held at 60degC before being drawn off, in order to kill any bacteria present in the feed water.

Contacts and further advice may be obtained from:

Redditch Borough Council Asset Maintenance 01527 64252 Redditch Borough Housing Capital Team 01527 64252

REDDITCH BOROUGH COUNCIL

WATER SERVICES LOG BOOK

CONTENTS

Written scheme for controlling the risk of exposure to Legionella bacteria in Redditch Borough Council premises

Advice to building occupiers concerning regular flushing of showers

Record sheets for Legionella precautions carried out by occupiers

Record sheets for Legionella precautions carried out by Service Contractors

Water Quality guidance document – Management Arrangements for the Control of Legionella and Maintenance of Wholesome Water Quality in Redditch Borough Council Buildings

Legionella Risk Assessment for the Premises

Schematic diagram of the water services

Any other relevant documents may be filed in this log, such as:

Maintenance Contractor's reports Disinfection and cleaning certificates Completed temperature record sheets

REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

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REDDITCH BOROUGHCOUNCIL

WATER QUALITY POLICY

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If a shower has been unused for more than a week, for example at the start of the football season, then the water inside it could potentially be contaminated. In such cases, however, it is a wise precaution to avoid the creation of an aerosol or excessive splashing.

With flexible shower hoses, the spray head could be lowered temporarily into a bucket placed on a stool, and the water run to drain that way without creating an aerosol. In the case of fixed high-level shower heads, the most simple and practical way of achieving safe flushing is to fabricate a length of rigid plastic piping, of the required length to suit the shower, fitted with a tundish at the upper end. The tundish is positioned underneath the shower head and the discharged water is conveyed safely into the shower tray/outlet without generating an aerosol. With careful selection of the length of the pipe, the system can be made self-supporting.

Cleaning shower heads

This is no different to a shower in a domestic residence, with which most people are familiar and capable of keeping clean. Over time, scale may build up on the outlet plate but this can be removed by regular cleaning or scrubbing, or the use of a proprietary chemical descaler where a prolonged build-up has been allowed to occur (the COSHH Regulations apply to use of this at work). Public buildings and Communal showers in sheltered accommodations covered by the Redditch Borough Council will receive a six-monthly service to all showers, which includes cleaning and descaling of all shower heads. Normal domestic cleaning during the intervening period should prevent undue build-up of scale.

Name of Premises

Name and Position of person undertaking checks

Week starting:												
Weekly Flush little-used outlets to drain, without release of aerosols. Record date done Check and record blended water temperatures from												
thermostatic mixing valves, where fitted. Initial to confirm that stable temperature is attained within 1 minute.	°C	°C	°C	°C	°C	°C	°C	°C	°C	°C	°C	°C
Monthly Check and record water temperatures at sentinel taps.			Hot:	°C			Hot:	°C			Hot:	°C
Hot water to be >50°C after 1 minute.			Cold:	°C			Cold:	°C			Cold:	°C
Cold water to be <20°C after 2 minutes Check and record calorifier			Flow:	°c			Flow:	°C			Flow:	°C
temperatures. Flow to be 60°C, return to be >50°C.			Return:	°C			Return:	°C			Return:	°C

.

Three Monthly

Dismantle, clean and descale shower heads and hoses.

Initial and record date done.

over /

Record for six monthly and annual checks (if they fall within currency of record form)

Date:	January 20	July 20
Six monthly Measure cold water temperature rise between incoming main and most distant outlet. Calculate and record temperature rise.	Cold water temperature at/near mains inlet = °C Cold water temperature at furthest outlet =°C Temperature rise (subtract) = °C	Cold water temperature at/near mains inlet = °C @ CODE COLD COLD COLD COLD COLD COLD COLD COLD
Annually Check and record temperatures at a representative number of taps throughout the system on a rotational basis.	Location of taps: a)	Water temperature Date =°C

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Duties to be undertaken by Service Contractor Sheet 1 of 2

Name of Premises

Name and Position of person responsible or Officer-in-Charge

Action	Date	Signature	Date	Signature	Date	Signature	Date	Signature
Six-monthly: Measure incoming water temperature at storage cistern float-operated valve and cistern outlet. Inspect storage cisterns and report defects or undertake remedial work Clause 3.21.1(a)	Notes		Notes		Notes		Notes	
	Date	Signature			Date	Signature		
Annually: Take sample and record								

		Appendix 2
condition of water from hot water system calorifier drains - Clause 3.21.18	Notes	

Duties to be undertaken by Service Contractor

Sheet 2 of 2

Action	Date	Signature	Date	Signature
Annually:				
Open up and inspect internal surfaces of hot water system calorifiers (where possible) for scale or sludge. Clean or descale as necessary, heat up to 60°C and hold for 1 hour before putting back on line - Clause 3.21.18	Notes		Notes	
	Date	Signature	Date	Signature
Annually: Inspect cold water				

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						Appendix 2
cisterns and carry out remedial work as necessary. Shut off incoming water and carry out 'drop test'. Record defects - Clause 3.21.1(b)	Notes			Notes		
	Date	Signature		Date	Signature	
Annually: Physically inspect hot and cold water systems and check accuracy of schematic drawings. Note changes. Check for under-used water fittings and report - Clause 3.21.28						
	Notes		Notes			

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APPENDIX 1

Redditch Borough Council

Private Sector Housing Strategy 2010-2015

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Forward

I am pleased to introduce Redditch Borough Council's Private Sector Housing Strategy for 2010 – 2015. The Borough has a thriving private housing sector, and the council are pleased to be supporting private sector landlords, private tenants and owner occupiers to ensure standards are kept high.

Redditch Borough Council aspires to ensure that homes in Redditch are decent, safe and secure places for people to live in. We want households that are entitled to support to improve housing conditions, to be able to receive that support. We are committed to ensuring households are well insulated and fuel poverty is reduced. These objectives contribute to the wider corporate vision of the council which is; "Redditch is an enterprising community, clean and green."

This council is committed to achieving the objectives detailed in the Private Sector Housing Strategy. This Strategy will help both staff, Members, Stakeholders and the Public to see clear direction for the Council and assist in their understanding of their own role and responsibilities for shaping the future of private sector housing in Redditch.

Councillor Brandon Clayton

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Housing, Local Environment and Health Portfolio Holder

Executive summary

- Central Government recognises the importance of a thriving private sector, and looks to local authorities to support this. Redditch Borough Council has already developed some outstanding initiatives to improve conditions in the private sector. To continue to make a real difference the objectives outlined in the action plan of this strategy need to be implemented.
- The Central ward has the greatest need for action to improve properties. This
 is due to the high number and density of pre 1919 dwellings. Adjacent wards
 with similarly aged dwellings (Abbey, Lodge Park and Headless Cross and
 Oakenshaw) also give a high percentage and a strong need for future
 investment in the stock.
- Astwood Bank and Feckenham ward give the second highest output, and in the Building Research Establishment (BRE) stock modelling survey (2009) analysis this ward is higher than the national BRE average in six out of nine categories. This ward has highest percentage of SAP less than 35 (24%). Astwood Bank and Feckenham ward contains some of the oldest properties in the Borough. Pre 1919 dwellings are more difficult to insulate, and many are not connected to mains gas. These factors can contribute to excess cold in dwellings, a HHSRS Category 1 hazard. There are parts of this ward that are affluent with the likelihood of no need of financial assistance. However the BRE data (2009) states this ward has 573 dwellings (28%) with Category 1 hazards. The council has a duty to act in cases of Category 1 hazards. Due to the age of the stock it is likely that the hazard in this area is excess cold. And with 373 households (19%) in fuel poverty there is clearly a need for support in this area.
- Work is required to assist rural dwellings where householders are in *need* of assistance. Although there are a lower percentage of vulnerable households in this area, it doesn't mean that there aren't households requiring support.
- The council will work with the priority areas to promote grants to improve energy efficiency, disabled facilities grants and lifetime loans, including those aimed at HMO landlords.
- Work is needed to support private landlords to raise standards and access support in the form of advice and financial assistance that is available to them.
 In particular encouraging landlords to become accredited by the Midland Landlord Accreditation Scheme (MLAS).
- Private sector tenants, landlords and owner occupiers were surveyed about their priorities for private sector housing services, the results are:
 - 1. Provide assistance to low-income households on property maintenance and helping arrange subsidised loans.

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- Helping older people and people with disabilities live independently in their own homes by providing stairlifts, wider doorways, ramps etc.
 Returning empty properties to use.

Introduction

The majority of Redditch residents live in the private sector, either as owner occupiers or private tenants (71% owner occupier and 4% private tenants – 2001 Census). It is therefore important that the Council has a clear understanding of the issues relating to this sector and the condition of the stock.

Chapter One identifies the strategic drivers; national, regional and local that influenced this strategy.

Chapter Two gives a profile of private sector housing in Redditch and reports on the stock modelling survey findings produced by Building Research Establishment (BRE), carried out in April 2009.

Chapter Three reports on findings from consultation with residents. This information helped identify priority areas for Redditch Borough Council to focus on. It then details the **priorities** for this strategy. It will outline the key areas that have emerged from a review of the strategic context, stock modelling and through engagement with stakeholders.

Chapter Four details the current functions carried out by the private sector housing team, and identifies where we want to be in the future and how we can achieve this.

The appendices to this document include an action plan outlining the delivery of this strategy. There is also a progress report from the 2004 Private Sector Housing Strategy.

Chapter 1: Private Sector Housing – a national, regional and local strategic priority

National policy drivers

At a national level, the Government is committed to improve the quality of private sector accommodation and has introduced legislation and policies that affect the way the council delivers services in the private sector. These are summarised as follows:

Quality and Choice: A Decent Homes for All (2000)

A green paper that introduced a new policy direction in terms of the Decent Homes Standard. It set national targets for social and private sectors for meeting the standard.

The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (RRO 2002).

This emerged from 'Quality and Choice - A Decent Home for All' and introduced wide-ranging discretionary powers for local authorities to provide more flexible ways in addressing private sector renewal. The centre of the RRO is a policy view that homeowners have a basic responsibility to maintain their properties using their own resources. This has resulted in a shift in national policy from the use of grants to loan-based models of assistance.

The RRO places a mandatory duty on local authorities to adopt a strategy to assist homeowners to maintain and improve their homes.

The Housing Act 2004

This is the most significant piece of primary legislation relating to private sector housing. It reinforces the link between housing and health and introduced a measure for assessing health and safety hazards. The Housing, Health and Safety Rating System (HHSRS) replaced the 'fitness' standard for housing. The Act also strengthens and increases the rights for private tenants. It introduced a system of tenancy deposit protection schemes, and most significantly a landlord licensing requirement for certain types of shared housing referred to as houses in multiple occupation (HMOs). Additional powers are also available under this legislation for councils to tackle empty properties, and to declare additional and selective licensing where there are problems associates with anti-social behaviour.

The 2004 Act places a number of mandatory duties on the Council which include:

- A duty to review the housing stock
- A duty to intervene where a Category One Hazard exists
- A duty to set up a Mandatory HMO licensing scheme and proactively seeks licensable HMOs
- A duty to issue Interim and Final Management Orders when appropriate

The Council also has the following discretionary powers:

- Power to deal with Category Two Hazards
- Power to set up an Additional Licensing Scheme
- Power to set up a Selective Licensing Scheme
- Power to issue Empty Dwelling Management Orders
- Power to issue Special Management Orders

There are additional mandatory duties placed on a local authority though legislation:

Housing Grants Construction and Regeneration Act 1996 (HGCR 1996)

 A duty to assist people with disabilities to enable them to live independently within their own home

Home Energy Conservation Act (HECA) 1995

• A duty to report on the standard of energy efficiency throughout the Borough

The Housing Act 1996 as amended by the Homelessness Act 2002

This requires local authorities to carry out and publish a homelessness review and formulate a homelessness strategy. Use of move-on accommodation and temporary accommodation in the private sector, as an alternative to bed and breakfast, is a component of the County Homelessness strategy.

Planning and Compulsory Purchase Planning Act 2004 and the Fire Safety Order (2005)

This Act introduced a new approach to how a local authority may acquire land and homes via powers of compulsory purchase orders for the purposes of assisting regeneration and development programmes.

The Fire Safety Order replaces many of the references to fire safety in other legislation such as the Fire Precautions Act, Licensing Act and Housing Acts with a simple, single order. It requires any person who exercises some level of control in premises to take reasonable steps in reducing the risk from fire and ensure occupants can safely escape. This entails greater partnership working between the fire service and local authorities in responding to fire and safety issues, particularly in the case of enforcing standards in the private rented sector.

The Housing Green Paper, Homes for the Future: More Affordable, More Sustainable (2007)

This sets out the government's policy proposals to remedy acute shortages of new affordable housing, through its home ownership and affordable housing programmes such as the National Affordable Housing Programme (NAHP) and the HomeBuy scheme. The paper advocates a need to reduce the number of empty properties and also reduce the number of people in temporary bed and breakfast accommodation.

Projected increases in the growth of the older (aged 60 or over) resident population, who will make up 48 per cent of the increase in the number of additional households by 2026, mean it's a major policy priority to ensure housing, health and care services are adequately joined up to respond to this demographic change. The importance of accessible homes and neighbourhoods that meet the needs of older people is contained in the 'National Housing Strategy for an Ageing Society: Lifetime Homes, Lifetime Neighbourhoods'. The strategy also sets out targets and measures to increase the number of accessible homes to meet the future housing needs and aspirations of older people. Targets are also set for more homes to achieve the Lifetime Homes Standard, which is the current recognised design code for accessible homes.

Housing is an important factor in enabling vulnerable people to live successfully as part of the community. The right support plays vital role in helping people to keep their tenancies and in preventing homelessness. Housing-related support through the government's **Supporting People** programme is one of the main ways that vulnerable people, including older people are given the opportunity to achieve or maintain independence and a better quality of life.

The Criminal Justice and Immigration Act 2008

This Act introduces the premises closure order which allows the police and local authorities to apply to magistrates' courts to close privately owned, rented, commercial and local authority premises at the centre of serious and persistent disorder or nuisance. This is an alternative if not appropriate to use an Interim Management Order.

The Protection from Eviction Act 1977 and the Housing Act 1988

Local Authorities have the power to start legal procedings for offences under the protection from eviction act. If the evidence justifies it then a local authority can carry out an investigation and prosecute.

The Government's commitment to raising the standards of the private sector is demonstrated in the aforementioned legislature. Central Government has taken a step further in its commitment to recognising the importance of the private sector, and commissioned a national review of this sector – *The Rugg Review*. The findings of this review, published October 2008 are currently out to consultation, but are summarised below:

The independent review into the Private Rented Sector (PRS), headed by Julie Rugg of the University of York, recommends a new drive to improve the quality of the sector through:

 Introducing a light touch licensing system for landlords and mandatory regulation for letting agencies, to increase protection for both vulnerable tenants and good landlords.

- Introducing a new independent complaints and redress procedure for consumers, to help end long drawn out disputes.
- Tax changes to encourage good landlords to grow, including changes to stamp duty to encourage them to buy more properties.
- Looking at ways for the PRS to be more accommodating towards households on lower incomes, including considering more support for landlords prepared to house more vulnerable people.
- Local authorities taking steps to better understand the sector and support good landlords whilst tackling poorly performing landlords and promoting tenants' rights.

Redditch Borough Council in partnership with Homestamp¹ responded to the consultation of this document and look forward to how this will be progressed.

Regional policy drivers

The national strategic drivers affecting private sector housing are translated at a regional level and summarised as follows.

West Midlands Regional Housing Strategy (RHS) June 2005

One of the core aims of this strategy is to see that the Governments' Decent Homes standards are met across all housing sectors including those in vulnerable circumstances in the private rented sector. The RHS encourages local authorities to:

- Work with financial institutions to develop schemes to allow those who wish to do so to mobilise capital tied up in their home.
- Work with businesses to continue to develop quality assure services to assist older people to maintain the fabric of their homes in the private sector. Demonstration projects should explore ways of offering a wider service and benchmark with other authorities in order to spread best practice in meeting the needs of older households.
- Vigorously pursue schemes to identify and assist vulnerable households in fuel poverty.
- Explore initiatives with private sector developers which bring private sector empty homes back into use. Look at grants to enable empty homes to achieve decent homes targets; which can then be let to homeless families.

The RHS expects local authorities to:

 Demonstrate they have a robust assessment to the extent to which vulnerable households in the private sector are housed in non-decent stock within their area and that they have a clear and effective strategy, within the context of their overall neighbourhood renewal strategy, to deal with this. All possible

¹ Homestamp are a regional consortium of local authorities, landlord associations, police and fire services

sorts of funding sources should be explored in order to establish the most effective means of obtaining sustainable improvements.

West-Midlands Kick Start

The renewal of existing private sector housing in the RHS is prioritised under a programme known as **Kick Start**. The initiative aims to provide home improvement assistance to around 4,000 vulnerable/low income households to improve their home towards, or to, the Decent Homes Standard. Funding for Kick Start has been increased on the basis that this will be the main funding source for private sector decent homes.

The underlying principles of the Kick Start programme are based on:

- The need to work in partnership, pool resources and add value to scarce public resources through joint commissioning of key services.
- The use of loans as a replacement for grant funding when helping homeowners improve house conditions in the private sector.
- The use of home improvement agencies and the good practice of caseworkers to offer home options advice and secure the most sustainable package of solutions in response to the homeowners' needs
- The use of fully regulated financial advice and fund management services offering a range of loan products and operating consistently to meet the standards and conditions of potential private sector funders.
- The need to operate and develop local delivery arrangements towards rationalisation and capacity building, improving the capacity for service providers regionally.

Local policy drivers

Worcestershire Sustainable Community Strategy and Worcestershire Local Area Agreement (LAA)

The Worcestershire Partnership brings together local government, public services such as health, learning providers, police and probation, voluntary and community organisations and local businesses within Worcestershire. The work of the Partnership is based on a shared common purpose and good will.

Its vision is for "a county with safe, cohesive, healthy and inclusive communities, a strong and diverse economy and a valued and cherished environment".

Redditch Local Strategic Partnership (LSP)

The vision of Redditch Partnership is for:

Redditch to be successful and vibrant with sustainable communities built on partnership and shared responsibility. We want people to be proud that they live or work in Redditch Redditch Partnership brings together representatives from public, private, community and voluntary agencies to work together effectively to deliver a range of local projects, services and initiatives. Redditch Partnership aims to provide a leadership and governing role through sharing information, resources and effort to efficiently and effectively meet the needs and aspirations of local communities.

Redditch Partnership is responsible for producing and delivering the **Redditch Sustainable Community Strategy (2008)**. It has core themes, built around the same core themes of the LAA that are:



Communities that are safe and feel safe



A better environment – for today and tomorrow



Economic success that is shared by all



Improved health and wellbeing



Meeting the needs of children and young people



Stronger communities

RBC Corporate Plan 2009-2012

The Council's Corporate Plan has established a new vision for the development of Redditch which is:

Our vision is for Redditch to be an enterprising community which is safe, clean and green.

To underpin the delivery of the Council's priorities it is recognised that the Council needs to be:

 A well managed organisation that uses its resources effectively in order to achieve its priorities and values and delivers high quality services that meet the need of its residents and provide value for money.

Redditch's corporate plan has priorities that fit into the themes of the Sustainable Community Strategy and the Private Sector Housing Strategy will fulfil the objectives of the Corporate Plan.

Redditch Housing Strategy Statement 2005 - 2009

The councils' Housing Strategy Statement identifies four strategic priorities for the further development of housing. This includes:

- Improving conditions in the private sector
 - Carry out enforcement activity against landlords and householders to maintain housing conditions
 - Develop an Empty Homes Strategy
 - o Improve financial assistance given based on hierarchy of assistance
 - o Improved communication with private landlords

The Housing Strategy identifies the need to engage with private landlords to promote greater understanding of Housing Benefit regulations, increase the uptake of energy efficiency grants, identify issues of concern, help develop our policies regarding the private sector and to raise standards in the sector. This Private Sector Housing Strategy will help deliver these priorities.

Homelessness Strategy – Working together to change lives and Homelessness and Housing Advice Review 2008

In 2005 a Scrutiny review was undertaken by Members which looked at Homelessness Prevention. One of the findings recommended greater use should be made of the Private Sector in housing homeless households.

The Homelessness Strategy highlights that the private rented sector in Redditch is very small, less than half the national average. Re-let supply is therefore also low and an assessment has been undertaken to assess turnover relative to need levels. Over three years the survey data suggests that around 510 units a year become available, but 660 households require market rented housing, a shortfall of 150 units.

The Homelessness strategy sets local goals, those that are relevant to, and will be incorporated in this private sector housing are summarised here:

 Research and improve links with private sector landlords to prevent homelessness and overcome issues of access to this sector

Another goal identified by this Strategy is to encourage the best use of existing stock. One of the ways of doing this is tackling empty homes, this links into Redditch Borough Council's Empty Homes Strategy.

Empty Homes Strategy May 2009

Redditch Borough Council's Empty Homes Strategy launched in May 2009 aims to reduce the number of empty homes that are having a detrimental impact on the communities in which they are situated, and can potentially contribute to increasing the level of affordable housing in the Borough.

Housing Assistance Policy 2005

Redditch Borough Council offers discretionary Lifetime Loans to homeowners and landlords.

- Grants for owner occupiers are limited up to a maximum of £10,000 per dwelling over a three year period²
- Interest free loans for landlords of HMOs are available up to the value of 50% of the work, subject to a maximum of £3,000 per unit of accommodation

Worcestershire Home Improvement Agency (HIA) Review

Redditch Borough Council in conjunction with the local authorities within the County are reviewing the Home Improvement Agency (HIA) as part of a move to have a countywide HIA. The HIA will look to join West Midlands Kick Start. Currently North Worcestershire Care and Repair Agency provide lifetime loans to the private sector to improve standards for vulnerable households and undertake Disabled Facility Grant (DFG) work on behalf of the Council.

Redditch Borough Council's private sector housing function is continually developing and has recently introduced new initiatives such as landlord accreditation, rent deposit guarantee scheme, a system on licensing HMOs and a strategy to bring empty properties back into use.

The Rugg review recommended that more support is needed for good landlords and this strategy recognises there is further room to develop in this area. The Rugg review also recommends that local authorities commit to promoting tenants rights, and this strategies' action plan sets out ways we can achieve this.

Although the role of the private sector housing service has grown, it is recognised that there are still areas that are underdeveloped. This strategy seeks to address these weaknesses and aims to give a clear direction of travel over the next five years. The next chapter gives a profile of the population and private sector housing stock in Redditch to illustrate areas requiring attention.

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² To qualify the homeowner must have an entitlement to an income related benefit with less than £6,000 in savings.

Chapter 2 Profile of private sector housing in Redditch

Issues in Redditch



Whilst the level of owner occupation in Redditch (71%) is above the national average, it is below the County average. In terms of owner occupation, more people in Redditch are purchasing their property with a mortgage than those who own their property outright.

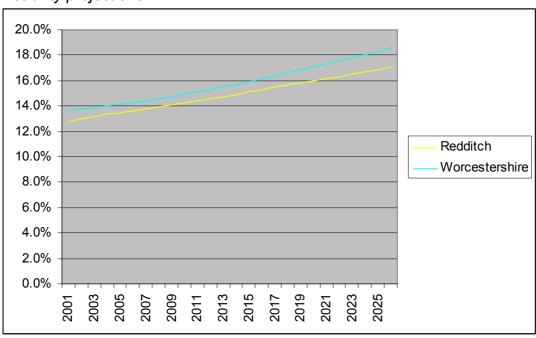
There is a variation across the district, (illustrated in the table below) particularly Central with a high level of privately rented accommodation.

Percentage of Homes in each te	Percentage of Homes in each tenure , by Ward						
Ward	Owned	Private rent	Social rent	Other	Total No		
Abbey	73%	4%	21%	3%	2,065		
Astwood Bank and Feckenham	82%	5%	11%	3%	2,190		
Batchley	49%	3%	44%	4%	2,724		
Central	68%	13%	15%	3%	2,194		
Church Hill	62%	2%	33%	3%	3,419		
Crabbs Cross	86%	3%	9%	2%	2,280		
Greenlands	63%	3%	32%	2%	3,166		
Headless Cross & Oakenshaw	74%	5%	19%	2%	3,703		
Lodge Park	67%	4%	25%	3%	1,976		
Matchborough	73%	2%	22%	3%	2,316		
West	85%	3%	10%	2%	2,212		
Winyates	74%	2%	22%	2%	3,407		
Redditch Total	71%	4%	23%	3%	31,652		
Source:2001 Census				•	•		

The Borough has two distinct areas within its boundaries of roughly equal size. There is the largely urban area of the north east which includes Redditch town centre (this area has 93% of the population) and the other essentially rural area to the south and west, including Astwood Bank and Feckenham (which has 7% of the population).

Population Profile

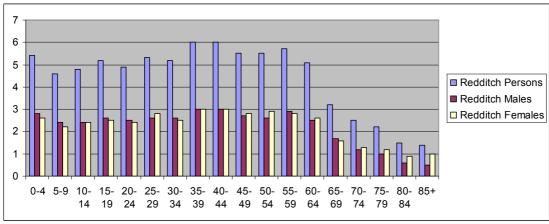
Disability projections



Source: Research & Intelligence Unit, Worcestershire County Council

In line with the rest of the County, households that are affected by a member with a disability are projected to increase. Redditch is projected to rise from 14.1% in 2009 to 15% in 2015, over the life of this Strategy and to almost 20% in 2025. This indicates that more support will be needed.

Population Projections



Official ONS Mid-2008 Population Estimates %

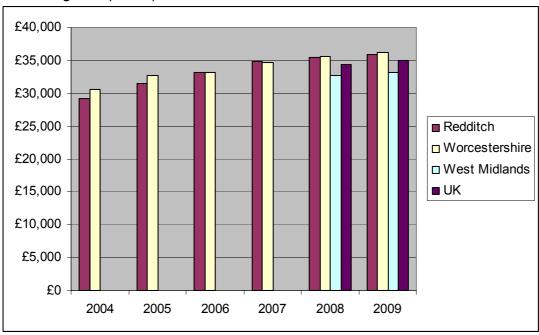
For Mid-2008 Redditch has an estimated population of 79,940. Projections indicate that by 2021, Redditch will have a significant section (over 30%) of the population over 65. This has implications on the development of housing stock in the borough

and emphasises the importance of having robust Private Sector Housing Renewal provisions.

Housing Need

The South Housing Market Area assessment for 2007/08 indicates there is a 171 annual affordable housing shortage for Redditch. Some of this demand can be met using the private rented sector. Many landlords work with the council to support the demand for affordable housing, and do meet the decent homes standard. To ensure that properties do meet this standard Redditch Borough Council has developed a Property Accreditation Scheme to trains and supports landlords.

Income figures (mean)



Source: PayCheck, CACI.

The mean income figures for Redditch are slightly lower than the Worcestershire average, but higher than the West Midlands and the UK mean average.

Stock modelling survey

Building Research Establishment (BRE) completed a stock modelling survey of Redditch private housing (all non-social) in April 2009. This stock modelling survey is a proven desk top method of surveying homes using national data sets. Their methodology can be found in appendix 4.

The research is broken down into the following categories:

- 1. Non decent
- 2. Inadequate thermal comfort
- 3. Housing Health and Safety Rating System (HHSRS) Category 1 hazards

- 4. Disrepair
- 5. Non modern
- 6. SAP less than 35
- 7. Fuel poverty
- 8. Vulnerable households
- 9. Vulnerable non decent

Definitions of these indicators can be found in appendix xx.

Summary of BRE findings

The BRE data has enabled the council to identify the specific areas where resources to improve conditions should be targeted. The maps are shaded by **census output** areas³.

A summary of the data broken down into **wards** can be found on the spreadsheets overleaf. When looking at the figures broken down into wards, it is important to note particular streets extending across ward boundaries can create a high output, these are clustered together particularly in the central ward area, with similar types of properties that form the centre of Redditch.

The maps are of particular importance when analysing the data because it shows areas of housing type, extending across ward boundaries that give a similar output.

Central ward, with high density housing and high numbers of pre 1919 dwellings has the *highest percentage*⁴ of dwellings in the following categories: non-decent dwellings, dwellings with inadequate thermal comfort, dwellings with category 1 hazards, dwellings in disrepair, non-modern dwellings, dwellings in fuel poverty, vulnerable households, vulnerable households living in non-decent accommodation.

Astwood Bank and Feckenham ward has the highest percentage⁵ of dwellings with a SAP less than 35, scores worst (lowest) in vulnerable households living in decent accommodation, the *second highest* percentage next to Central of non-decent dwellings, category 1 hazards, dwellings in fuel poverty and dwellings in disrepair. This is again due to the age of properties in this ward.

On some of the maps for example dwellings with inadequate thermal comfort, if you look at Batchley most of the ward appears to be in good condition, but a particular output area gives a high percentage. Therefore even in wards where properties appear to be in good condition there are hot spots where future policy and resources

³ A census output area is a cluster of streets with the same unit postcode and they fit within ward boundaries. If a postcode straddles a ward boundary it's split into two output areas.

⁴ BRE 2009 stock modelling survey

⁵ BRE 2009 stock modelling survey

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need to be directed to improve condition. This factor will be taken into consideration in action planning and must be considered in planning future grants schemes.

BRE stock modelling findings

			%	of dwellings					% of	households	
Ward	Dwellings (private)	Households (private)	Non decent	Inadequate thermal comfort	HHSRS Cat. 1	Disrepair	Non modern	SAP less than 35	Fuel poverty	Vulnerable ⁶ households	Vulnerable non decent
Abbey	1688	1647	31%	15%	20%	6%	1%	11%	13%	24%	9%
Astwood Bank and	2042	1968	41%	18%	28%	11%	1%	24%	19%	13%	7%
Feckenham											
Batchley	1633	1530	24%	15%	13%	6%	1%	6%	8%	25%	7%
Central	1990	1868	48%	30%	35%	23%	4%	15%	22%	39%	16%
Church Hill	2332	2276	25%	14%	14%	2%	0%	6%	10%	19%	4%
Crabbs Cross	2104	2069	22%	10%	14%	4%	1%	7%	6%	14%	5%
Greenlands	2311	2164	30%	18%	18%	6%	1%	11%	11%	27%	7%
Headless Cross and	3059	2997	31%	16%	18%	7%	2%	11%	10%	20%	8%
Oakenshaw											
Lodge Park	1518	1483	36%	21%	23%	11%	2%	11%	13%	28%	9%
Matchborough	1836	1799	26%	15%	16%	2%	0%	7%	9%	22%	5%
West	2062	1989	25%	12%	15%	5%	1%	8%	9%	13%	4%
Winyates	2717	2676	25%	14%	14%	2%	0%	6%	8%	19%	4%
Redditch	25291	24466	30%	16%	19%	7%	1%	10%	11%	21%	7%
England	18053000	17496000	36%	17%	24%	8%	2%	13%	12%	18%	8%

Key:

Above national average

The BRE survey is a model based on national and local data sets. The table above is a summary of percentages, displayed by ward. The table overleaf is a summary by ward of numbers of dwellings or households. This is broken down further into census output areas on maps in the next section.

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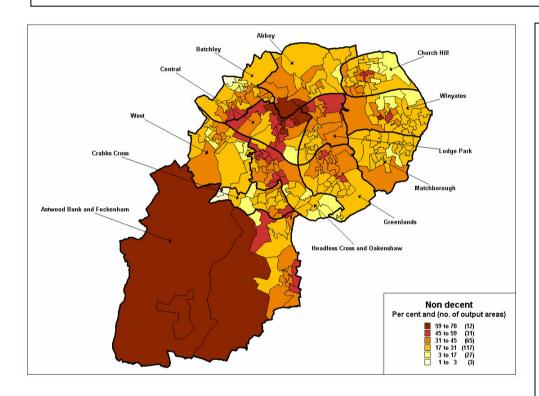
⁶ A definition of vulnerable used here uses the definition used by the CLG in its 2006 EHCS report. This included households who were in receipt of means tested and disability based benefits.

BRE data using numbers of households or dwellings

Ward	Dwellings (private)	Households (private)	Non decent	Inadequate thermal comfort	HHSRS Cat. 1	Disrepair	Non modern	SAP less than 35	Fuel poverty	Vulnerable households	Vulnerable non decent
Abbey	1688	1647	521	253	342	107	20	186	211	394	156
Astwood Bank and											
Feckenham	2042	1968	829	368	573	218	20	494	373	259	133
Batchley	1633	1530	392	246	213	92	24	102	119	378	113
Central	1990	1868	954	595	692	453	84	297	407	727	298
Church Hill	2332	2276	573	315	325	53	6	147	236	440	96
Crabbs Cross	2104	2069	464	217	286	81	12	141	134	292	95
Greenlands	2311	2164	697	415	426	129	17	263	244	580	153
Headless Cross and Oakenshaw	3059	2997	961	477	551	206	55	343	286	587	236
Lodge Park	1518	1483	550	323	351	160	24	162	188	422	128
Matchborough	1836	1799	486	275	286	42	4	134	153	399	86
West	2062	1989	506	239	314	108	11	158	174	259	78
Winyates	2717	2676	672	384	373	66	5	170	203	509	109
Redditch	25291	24466	7606	4109	4734	1716	283	2598	2729	5246	1682

Non Decent dwellings

Definition: To qualify as a 'Decent Home' a dwelling must satisfy four criteria, these are: 1) meeting the current statutory minimum standard for housing, 2) being in a reasonable state of repair, 3) having reasonable modern facilities and services, 4) providing a reasonable degree of thermal comfort. Non Decent dwellings would be failing in one or more of these four areas.



Two wards have higher than the national BRE average of 36%. Central ward has the highest percentage of non decent dwellings at 48% (954 dwellings). The second highest is Astwood Bank and Feckenham ward at 41% (829 dwellings). Lodge Park ward is the same as the national BRE average at 36% (550 dwellings), all other areas fall below the level of the national BRE average.

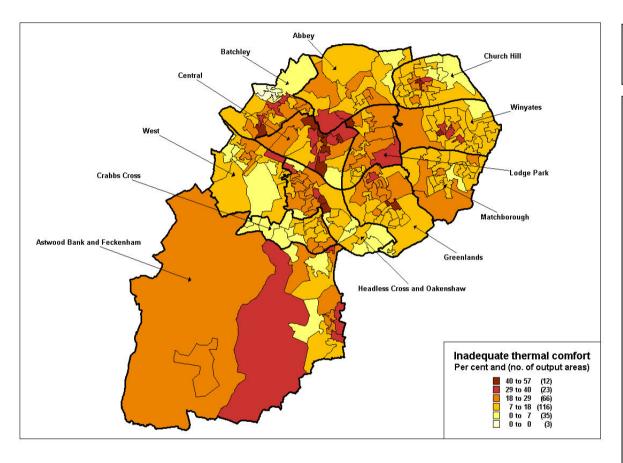
These two wards with the highest percentage of nondecency have older properties than the rest of the borough. The Central ward has a high number of private rented dwellings and many pre 1919 properties converted into houses in multiple occupation (HMO).

Due to the ribbon development of the town centre in the 19th century, some issues of non decency as detailed extend on the fringe of the Abbey and Lodge Park wards.

Parts of Feckenham and Astwood Bank have some of the oldest dwellings in the borough, this impacts on the findings.

Part of central Winyates ward is a hot spot that gives a high output for non decency, this area consists mainly of council housing, but with quite a high level of right to buy. This indicates that the now privately owned properties are not decent and the owners may be in need of assistance.

Dwellings with Inadequate Thermal Comfort



Definition: A dwelling is required to have both efficient heating; and effective insulation to meet standard for adequate thermal comfort.

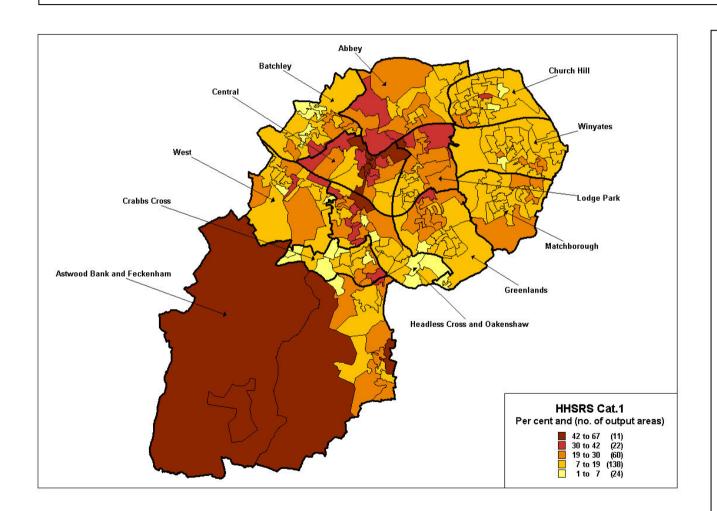
The area with the highest percentage of inadequate thermal comfort is Central ward with 30% (595 dwellings) in this category. There is a vast number of pre 1919 dwellings with typically difficult to insulate solid walls. Again the pre 1919 dwellings in the central area rate the poorest in this category, this being due to the age of the dwellings.

Lodge Park ward is the second highest with 21% (323 dwellings). Astwood Bank and Feckenham ward and Greenlands ward are at 18%, both higher than the national BRE average of 17%.

Analysis indicates some of the district centre town dwellings are hot spots, this is could be flats with difficult to insulate flat roofs.

Dwellings with HHSRS Cat 1

Definition: The HHSRS assesses 29 categories of housing hazard (e.g. damp, excess cold, crowding and space). A hazard rating is expressed through a numerical score, those with scores above 1000 are rated as having Category 1 hazards.



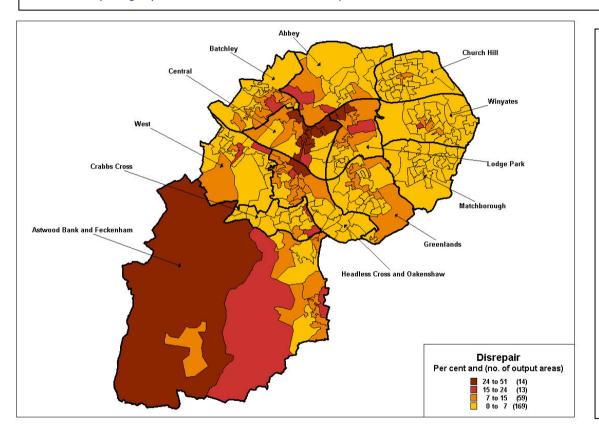
The ward with the highest number of Category One hazards is Central ward with 692 (35%), followed by Astwood Bank and Feckenham ward with 573 (28%). This compares to the national BRE average of 24%. Again this is attributed to the age of the stock.

Areas giving a high output in this category are the ribbon development dwellings in Mount Pleasant which are pre 1919. Feckenham and most of Astwood Bank (in particular the High street area that includes Evesham Road and Feckenham Road) have a high percentage of dwellings with Category 1 hazards.

It is likely that in Central ward and Astwood Bank and Feckenham ward that the cause of the category 1 hazards is excess cold due to the age of the dwellings. Promotion of grants to improve insulation and services to vulnerable households in this area is required.

Dwellings in Disrepair

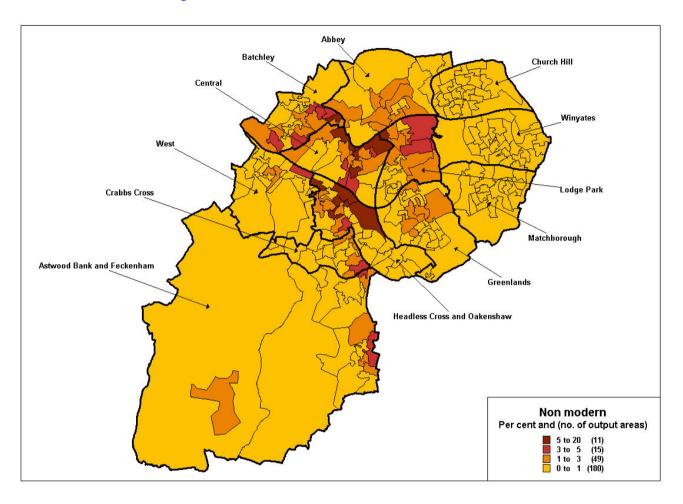
Definition: The condition of components are measured against their expected component lifetimes to measure disrepair. For example wall structure – 80 years, external doors – 40 years. To qualify as being in 'disrepair' the component must have over a set % in disrepair, e.g. wall structure requiring replacement of 10% or more or repair 30% or more.



Central ward has the highest level of disrepair at 23% (453 dwellings) compared to Redditch as a whole at 7%. There is a considerable margin between central and the second highest level of disrepair. The second joint highest both with 11%, and above the national BRE average of 8% are Astwood Bank and Feckenham ward (218 dwellings) and Lodge Park (160 dwellings).

Again the level of disrepair in these wards can be attributed to the high number of pre 1919 dwellings.

Non-Modern Dwellings

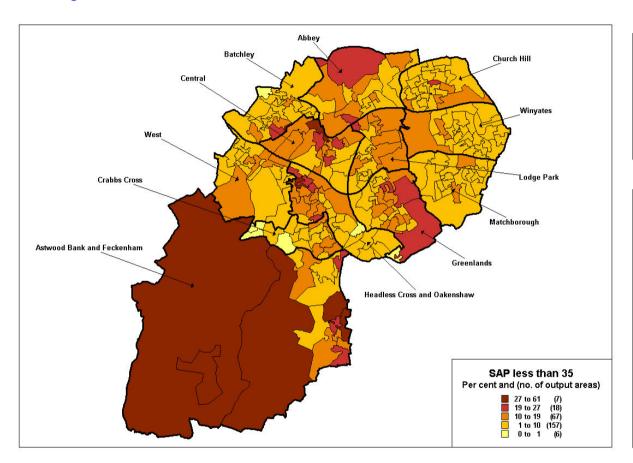


Definition: A dwelling is considered nonmodern if it lacks three or more of the following facilities;

- a kitchen which is 20 years old or less
- a kitchen with adequate space and layout
- a bathroom which is 30 years old or less
- an appropriately located bathroom and WC
- adequate noise insulation
- adequate size and layout of common entrance areas for blocks of flats.

The highest percentage of non-modern dwellings is in Central ward with 4% (84 dwellings), again considerably higher the rest of Redditch and the only ward above the BRE national average of 2%. This is again due to the higher proportion of private rented and pre 1919 dwellings in this area.

Dwellings SAP less than 35

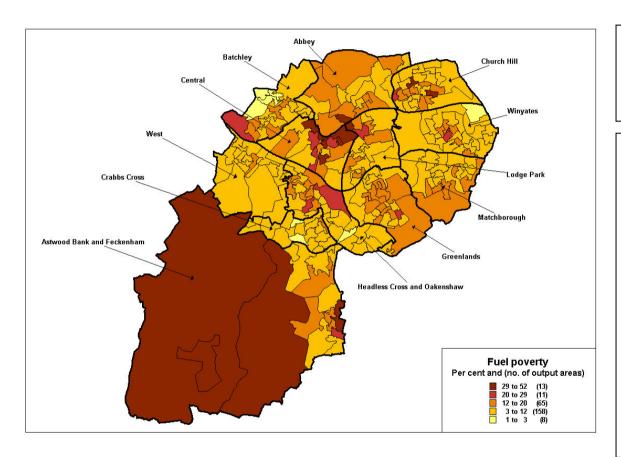


Definition: SAP is the Government's standard methodology for home energy cost ratings. SAP ratings allow comparisons of energy efficiency to be made, and can show the likely improvements to a dwelling in terms of energy use. A SAP rating runs from 1 (very inefficient) to 100 (very efficient).

Redditch has two wards with a SAP rating less than 35 and is above the national BRE average of 13%. These are Astwood Bank and Feckenham with 24% and Central with 15%.

These wards have a very high number in this category, most likely due to the high number of pre 1919 dwellings that are hard to insulate and heat, and a high number of households in fuel poverty.

Households in Fuel Poverty



Definition: A household is said to be in fuel poverty if it needs to spend more than 10% of its income on fuel to maintain an adequate level of warmth (usually defined as 21 degrees for the main living area, and 18 degrees for other occupied rooms).

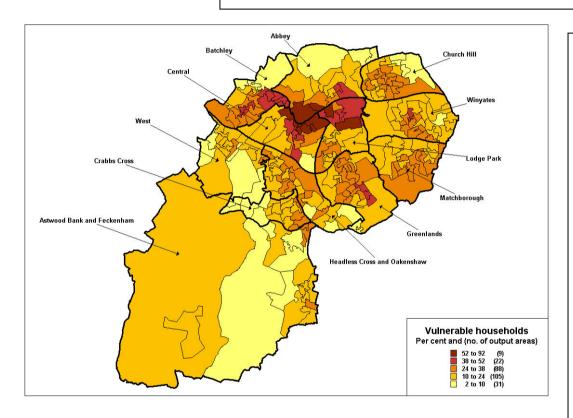
There are four wards with above BRE national average (12%) fuel poverty. Central ward has 22%, (407 dwellings) in fuel poverty. This is because it has the highest level of vulnerable households (see next section) and this combined with typically hard to insulate properties puts the in fuel poverty.

The next highest is Astwood Bank and Feckenhar ward with 19% (373 dwellings). This ward, as well as having many older properties it also has properties without mains gas, making energy more expensive therefore increasing fuel poverty.

Other areas with high output of fuel poverty are parts of Church Hill, Abbey and Lodge Park wards.

Vulnerable households

Definition: Vulnerable households are defined as those households in receipt of means tested or welfare related benefits. A full list can be found in appendix 3



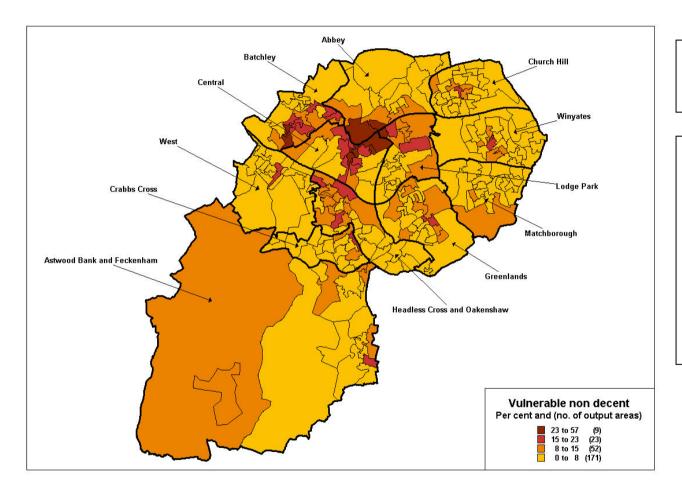
Central ward has a very high percentage of vulnerable households at 39% (727 households). There is a considerable margin between this ward and the second highest ward - Lodge Park with 28% (422 households).

Most wards (except for except for Crabbs Cross, Astwood Bank and Feckenham, and West) in Redditch are above the BRE national average (18%) for percentage of vulnerable households.

The highest output is from the pre 1919 dwellings in the town area, extending across ward boundaries (Central, Abbey and Lodge Park); an area with a high accommodation 5 percentage of private rented compared to the rest of Redditch. This is another indicator that resources should be targeted towards vulnerable households privately renting or owner occupiers in this area.

Astwood Bank and Feckenham ward have a very low percentage of vulnerable households - 13% (259 households), this is the lowest percentage of vulnerable households per ward in the borough (joint with West ward). This indicates that private households in this ward are less likely to require assistance with improving their properties.

Vulnerable non decent



Definition: vulnerable households (see previous definition) living in non decent dwellings (see non-decent definition).

The town centre wards (Central (16%), Abbey (9%), Lodge Park(9%)) give the highest output of vulnerable non decent households. With Central ward the highest at again at 16% (298 households). The BRE national average is 8%. Parts of Batchley also have a high percentage of vulnerable households living in non decent accommodation, although the overall percentage of for this ward is low at 7%.

Summary

The Central ward has the greatest need for action to improve properties. This is due to the high number and density of pre 1919 dwellings. Adjacent wards with similarly aged dwellings (Abbey, Lodge Park and Headless Cross and Oakenshaw) also give a high percentage and a strong need for future investment in the stock.

Central ward has the highest percentage in **eight** out of the **nine** categories examined by BRE;

- Non-decent (48% of dwellings),
- Dwellings with inadequate thermal comfort (30%),
- Dwellings with HHSRS Category 1 hazards (30%),
- Dwellings in disrepair (23%),
- Non-modern dwellings (4%),
- Households in fuel poverty (22%).
- Vulnerable households (30%),
- Vulnerable non decent (16%),

In the SAP less than 35 categories Central ward has the second highest percentage of 15% of dwellings, which is still higher than the national BRE average of 13%. It is the only ward to have a higher than the BRE national average non modern rating. The area that features most frequently in this ward is the ribbon development of properties stretching across Mount Pleasant where there is a high proportion of pre 1919, and three-storey buildings. Poor condition is strongly linked with the age of a dwelling, its use as a HMOs and the private rented sector, with this type of dwelling feature highly in this area. Redditch has above national average numbers of HMOs, the majority of these are located in the central area of the borough (wards including Central, Abbey, Lodge Park)

Astwood Bank and Feckenham ward give the second highest output, and in the BRE analysis is higher than the national BRE average in **six** out of **nine** categories. This ward has highest percentage of SAP less than 35 (24%). This ward ranks *second* highest in percentage of;

- Non-decent dwellings (41%),
- Dwellings with HHSRS Category 1 hazards (28%),
- Dwellings with disrepair (11% joint with Lodge Park),
- Households in fuel poverty (19%),

This ward has the *third* highest percentage of dwellings with inadequate thermal comfort (18% - joint with Greenlands).

Astwood Bank and Feckenham ward contains some of the oldest properties in the Borough. Pre 1919 dwellings are more difficult to insulate, and many are not connected to mains gas. These factors can contribute to excess cold in dwellings, a

HHSRS Category 1 hazard. There are parts of this ward that are affluent with the likelihood of no need of financial assistance. However the BRE data (2009) states this ward has 573 dwellings (28%) with Category 1 hazards. Due to the age of the stock it is likely that the hazard in this area is excess cold. And with 373 households (19%) in fuel poverty there is clearly a need for support in this area.

The North Worcestershire Care and Repair Agency give a very small number of grants to Astwood Bank and Feckenham. This may be due to fewer households being in receipt of qualifying benefits. There may be households in this ward that are eligible for council tax benefit for example that aren't claiming. Promotion of benefits lifetime loans, grants to improve insulation and other available support needs to be carried out in Redditch's rural areas.

Conclusion

Based on the evidence of the BRE stock modelling data this strategy recognises there are significant issues in older areas of the borough, and hot spots in part of the former new town areas. Resources and policies should be focussed towards the areas of most need, these being the older dwellings that are situated in Central and adjacent wards (Lodge Park and Abbey).

Work is also required to assist rural dwellings where householders are in *need* of assistance. Although there are a lower percentage of vulnerable households in this area, it doesn't mean that there aren't households requiring support. Particularly as there are a high number of households (373 households – 19%) living in fuel poverty in this area.

The council will work with the above priority areas to promote grants to improve energy efficiency, disabled facilities grants and lifetime loans, including those aimed at HMO landlords. Work is needed to support private landlords to raise standards and access support in the form of advice and financial assistance that is available to them. In particular encouraging landlords to become accredited by the Midland Landlord Accreditation Scheme (MLAS). This not only educates private landlords on required standards and best practice, but a benefit of being accredited by MLAS allows them to access grants for free loft and cavity wall insulation.

After the BRE data had been analysed the Housing Strategy team carried out a snap shot survey of private sector housing in the borough. This has helped to obtain residents priorities, and in conjunction with the BRE data, and the national, regional and local policy drivers will shape this strategies action plan. The strategic priorities are explained in the next chapter.

Chapter 3

Strategic Priorities for the future Redditch's Private Sector Housing

The process for establishing the strategic priorities for has been reached through examining the national, regional and local policy drivers, the BRE stock modelling data, and a snap shot survey. The results of the snapshot survey are outlined below.

Consultation with residents, homeowners and landlords

A snapshot survey took place during summer 2009 using face to face contact with customers, Redditch Borough Council's website and a postal/email survey of private tenants, landlords and owner occupiers to see which private sector housing services are seen as priority.

The survey asked respondents to select, **two** private sector housing services that they consider important for Redditch Borough Council to provide residents of Redditch.

There were 70 responses to the survey. It was mainly private tenants (57%) that responded, followed by owner occupiers (33%) then landlords (10%). Five respondents live outside of the borough, the remainder live in Redditch.

The response to this consultation prioritised the services in the following order:

	Service	%
1	Assistance to low-income households on property maintenance and helping arrange subsidised loans	17
2	Returning empty properties back to use	16
2	Helping older people and people with disabilities to live independently in their own homes by providing stairlifts, wider doorways, etc	16
3	Advice on reducing energy use and combating fuel poverty	15
4	Enforcing minimum house condition standards	12
5	Licensing of private landlords to encourage better standards of property management	10

6	Help with finding reputable builders	5
7	Advice to private landlords	5
8	Protecting private tenants from harassment from their landlords	3

This survey shows that residents' top priorities are:

- Assistance to low-income households on property maintenance and helping arrange subsidised loans
- Returning empty properties back to use
- Helping older people and people with disabilities to live independently in their own homes by providing stairlifts, wider doorways, etc
- Advice on reducing energy use and combating fuel poverty

The top priority; that respondents want the council to provide is assistance to low-income households on property maintenance and helping to arrange subsidised loans. This is reflected in the BRE data, households do need assistance to improve decency, reduce fuel poverty and improving thermal comfort. There is an opportunity to explore further assistance, in the form of loans using Black Pear (Worcestershire Credit Union), for those households that don't meet the criteria for the council's lifetime loans scheme, but are unable to access a loan to fund household maintenance through a bank.

This survey also highlights that private sector residents back the council's commitment to bringing empty properties back to use.

The BRE findings are also mirrored in this survey with 15% of respondents prioritising advice on reducing energy use and combating fuel poverty. The BRE research found that Central and Astwood Bank and Feckenham wards have a combination of 780 households in fuel poverty. The research finds that Redditch as a whole has 2729 dwelling in fuel poverty.

Merging priorities from research

The findings have been categorised in the following priority areas:

- 1. Improving housing conditions in the private sector
- 2. Support and advice to private sector tenants and vulnerable households

The table overleaf lists the priorities and shows from which process they have derived. It also links their relevance to the key themes in the Sustainable Community Strategy and Corporate Plan.

	Strategic Priority	Source	Sustainable Community Strategy Objective	Corporate Objective
1	Improving housing conditions in	the private sector		
	Fully implement Redditch Property Accreditation Scheme (PAS)	Snap shot survey BRE data 2009 Housing Act 2004 Protection form Eviction Act 1977 Housing Act 1988 Homelessness Strategy West Midlands Regional Housing Strategy 2005 – key objective		Enterprising Community Safe Clean and Green
	Develop a systematic approach to the inspection of licensable HMOs and the reissues of licenses	Housing Act 2004		Safe Clean and Green
	Returning empty properties back to use (Implement the Empty Homes Strategy)	Snap shot survey RBC Housing Strategy 2005 Homelessness Strategy Empty Homes Strategy 2009 Housing Act 2004 West Midlands Regional Housing Strategy 2005		Enterprising Community Safe Clean and Green
	Target areas with greatest need of support to improve thermal efficiency and fuel poverty	Snapshot survey BRE data 2009 West Midlands Regional Housing Strategy 2005 HECA 1995		Enterprising Community Clean and Green
	 Investigate what assistance can be given to off grid properties in rural areas. 	BRE data 2009 West Midlands Regional Housing Strategy 2005	36	Enterprising Community Clean and Green
	Provide assistance to low-income households on property maintenance and helping arrange subsidised loans and help older people and people with disabilities live independently in their own homes	Snap shot survey BRE data 2009 Decent Homes RRO 2002 HGCR 1996 West Midlands Regional Housing Strategy 2005 Disability projections		Enterprising Community Safe Clean and Green

	Explore and implement database system for recording PSHT work	Housing Act 2004 Housing Strategy KLOE	This is required to support the work carried out within the Private Sector Housing Team and underpins all of these objectives.
2	Give support and advice to privat	e sector tenants and vuln	erable owner occupiers
	Promote available grants lifetime loans and support schemes to Central (inc older style properties), Astwood Bank and Feckenham.	Snap shot survey BRE data 2009 West Midlands Regional Housing Strategy 2005	Clean and Green Enterprising Community
	Identify vulnerable private sector households, and promote energy efficiency grants, lifetime loans, and support	Snap shot survey BRE data 2009 West Midlands Regional Housing Strategy 2005	Clean and Green Enterprising Community
	Work with Redditch Credit Union or similar to develop a savings scheme for low income households to pay for home improvements	Snap shot survey BRE data West Midlands Regional Housing Strategy 2005 HGCR 1996	Enterprising Community
	Develop a proactive approach to liaising with and educating private tenants	West Midlands Regional Housing Strategy 2005	Safe Enterprising Community
	Develop a policy and procedure for dealing with harassment and illegal eviction	West Midlands Regional Housing Strategy 2005 Protection form Eviction Act 1977 Housing Act 1988	Safe
	Develop a policy and procedure for taking action in cases of serious ASB in privately rented property under the Criminal Justice and Immigration Act 2008	Criminal Justice and Immigration Act 2008	Safe Enterprising Community Clean and Green
	Produce tenants handbook	West Midlands Regional Housing Strategy 2005 Protection form Eviction Act 1977 Housing Act 1988 Homelessness Act 2002 Homelessness Strategy 2008	Safe

Analysis of Priorities

Improving housing conditions in the private sector

The majority of the population live in the in private sector either as owner occupiers or as private lets. The BRE data has helped the Council to identify which particular areas of the borough require support in improving conditions. The snap shot survey highlights that residents prioritise services that seek to improve conditions in the private sector, particularly:

- assistance to low-income households on property maintenance and helping arrange subsidised loans,
- returning empty properties back to use,
- helping older people and people with disabilities to live independently in their own homes by providing stairlifts, wider doorways, etc and
- advice on reducing energy use and combating fuel poverty.

It is well established that decent housing is an important factor of a healthy and socially stable population. Redditch PAS seeks to improve housing conditions in the private rented sector so that vulnerable households are not being put at risk.

Support and advice to private sector tenants and vulnerable households

By educating private tenants, they will be more empowered to manage private tenancies better, and make more of a positive contribution to their community, and be less likely to become homeless, in rent arrears and other debt. This strategy sees that this council has a responsibility to ensure that households that are entitled to assistance to improve their homes get that assistance. The council provides support in the form of lifetime loans for home owners on qualifying benefits. In addition there are those households not in receipt of qualifying benefits and on a low wage unable to access loans or mortgages, but still need support to finance essential property maintenance. An objective of this strategy is to develop a scheme that addresses this gap.

Summary

This strategy commits to delivering these priorities and the private sector housing team will:

- Intervene where housing conditions are statutorily unacceptable to ensure residents live in safe, healthy homes and.
- Provide education, information and support services to compliment the enforcement of legislation.

Chapter 4: Private Sector Housing Services

Where are we now?

What work are we doing now in the private sector?

There are staff working in four sections at Redditch Borough Council whose prime function is working with the private sector housing. They are located in Environmental Health, Housing Strategy, Care and Repair, and Housing Options.

Housing Options

The Homelessness Prevention Officer situated in Housing Options provides specialist advice regarding Assured Shorthold Tenancies and offers a mediation service between tenants and landlords with the aim of preventing homelessness. This post also manages the rent deposit scheme.

The table below shows how many priority need cases are being housed in the private rented sector.

Households assisted in the private rented				
sector	2005/06	2006/07	2007/08	2008/09
Priority need cases assisted with the private				
rented sector no deposit			22	21
Priority need cases assisted with the private				
rented sector with a deposit	5	26	15	37
Total	5	26	37	58

The use of the private rented sector for priority need cases is growing. The council has a responsibility to ensure the homes they are housed in are decent. The plan is to roll out Redditch Property Accreditation Scheme for vulnerable applicants.

The Housing Options Service is being enhanced via the Communities and Local Government Trailblazer Grant. This Trailblazer Programme includes projects that are to have a benefit to private sector tenants and owner occupiers, these include:

- Use Pod technology to tackle Overcrowding and Disability
- Information Packs for Offenders and Tackle Financial Exclusion
- Specialist Rent Deposit Scheme for Socially Excluded
- Shared House for Singles on Benefits
- Housing Options, Employment, Education, Benefit Link worker

North Worcestershire Care and Repair Agency (HIA)

The Care and Repair Agency is partly funded by a Supporting People contract and is currently undergoing a countywide review. A summary of the Agency has been included, but does not form part of the review of the private sector housing function.

What's happening operationally?

The Housing Surveyor and the Environmental Health Practitioner from the Environmental Health service currently carry out the tasks below relating to the private housing sector.

1.	Multi-occupied houses (HMOS, licensable and non-licensable)
1.1	Development of HMO licensing and re-licensing procedure for Redditch Borough
	Council
1.2	Proactively seeking licensable HMO's
1.3	Inspection of HMO's and issuing schedules of work to ensure compliance with the
	Housing Act 2004
1.4	Processing HMO lifetime loan applications, inspecting work and issuing lifetime loan
	payments in relation to these applications
1.5	Inspection of licensable HMO's to ensure that landlords comply with license conditio
	and to give general advice on regulations
1.6	Drawing plans for means of escape
1.7	Processing licence applications
1.8	Carrying out HHSRS inspections of all licensed HMO's, as required under Part 1 of
	Housing Act 2004
1.9	Proactively identify non-licensed HMO's and seek to prosecute landlords for non-
	compliance where
	appropriate

2.	General housing condition
2.1	HHSRS inspection of homes in the private sector based on complaints from the public regarding property conditions and as per requests from Housing Options
2.2	Dealing with complaints from the public about property conditions, inspecting and issuing notices where applicable
2.3	Dealing with housing prosecution cases under appropriate acts e.g. Housing Act 2004

3.	Grants and lifetime loans
3.1	Processing HMO lifetime loan applications, inspecting work and issuing lifetime loan
3.2	Dealing with grants enquiries for energy efficiency

4. Additional Inspections 4.1 Completing immigration inspections and reports, these are looked at primarily from the viewpoint of overcrowding under the Housing Act 1985, although there is an element of HHSRS inspection involved.

5.	Energy Efficiency
5.1	Promoting home energy efficiency
5.2	Dealing with grant enquiries for energy efficiency
5.3	Produce the annual home energy conservation report

What's happening strategically?

These roles are currently carried out by the Housing Policy Officer from the Housing Strategy service.

1.	Service development
1.1	Development, implementation and communication of strategies within private sector
	housing (e.g. empty homes)
1.2	Development, implementation and communication of private sector housing policies
	and procedures (e.g. Interim Management Orders)

2.	Energy efficiency			
2.1	Development and implementation of microgeneration technology scheme			
2.2	Promotion of energy efficiency to the private sector			
2.3	Delivery of the Warmer Worcestershire project			

3.	Working to raise standards in private sector housing
3.1	Development and education of staff and landlords on new policies
3.2	Developing and delivering training programme for colleagues and private sector landlords
3.3	Development and co-ordination the landlords' forum and newsletter
3.4	Development of private sector housing web pages
3.5	Communication of legislation affecting the private rented sector using leaflets, mail shots and Redditch Landlords' Forum.
3.6	Development and promotion of landlord accreditation scheme to private landlords and tenants
3.7	Development and promotion of Redditch property accreditation scheme
3.8	Work with partners (LA, police, fire service, Community Safety Partnership) to promote and share best practice and develop new initiatives in the private rented sector (e.g. Homestamp, MLAS)

Harassment and Illegal eviction

The Housing Policy Officer has also dealt with the investigation of reported cases of harassment and illegal eviction. In a period of six months a few cases have been investigated, and in 4 of these cases the tenant left the private landlord because they believed when the landlord told them to 'get out by tomorrow' they had no other option.

This indicates there is a need for educating private tenants, or prospective private tenants on their rights and responsibilities. The production of a private tenants' handbook and the provision of training would work to achieving greater understanding from landlords and tenant empowerment, and less homelessness applications.

North Worcestershire Care and Repair Agency

The key aim of the Agency is to help homeowners and private tenants remain safe, secure, comfortable and independent in their own homes by providing information and assistance if the house needs repairs, adaptations or improvements. The Agency is non-profit making and receives money from local government and other sources to operate the service. The Agency operates:

1. Disabled Facilities Grant (DFG)

This is a mandatory grant for people with disabilities for essential adaptations to give better freedom of movement into and around their home and to access essential facilities within it. Where necessary it can also provide the essential facilities themselves.

Who qualifies?

Anyone who has a disability or someone living with them who has a disability and requires adaptations to their property can apply. You must either be the owner of the dwelling, or be a private tenant and be able to provide the Local Authority with the necessary owners or tenants certificate. Confirmation from the owner that they are happy with the work being undertaken within their property is also required.

2. Lifetime Loans

Lifetime Loans are discretionary loans for essential repairs, improvements and minor adaptations to a dwelling or mobile home. It is given in the form of an interest free loan, that is repaid when the ownership of the property changes.

Who qualifies?

You must be a homeowner aged 18 or over, and have lived in the property for at least three years. You must have an entitlement to an income related benefit with less than £6,000 in savings.

Qualifying benefits include:

- Income support
- Income based Job Seekers Allowance
- Working Tax Credit
- Housing Benefit
- Council Tax Benefit
- Pension Credit

Expenditure

Grant	2005/06	2006/07	2007/08	2008/09
Disabled	£281K	£320K	£399K	£460K
Facilities				
Grant				
Minor	£78K	£95K	£189K	£163K
Works/Lifetime				
Loan				

Care and Repair: Grant expenditure

Progress report from Private Sector Housing Strategy 2004

The table at Appendix 2 is an updated version of the action plan from the existing Private Sector Housing Strategy (2004). The last two columns indicate whether the objective was completed, with an explanation where necessary, and whether any further action is required.

Some of this action plan has been implemented including the HMO licensing system for higher risk HMOs. To date 50 HMOs have been licensed, 9 are in the process of becoming licensed, and it is thought that there are a further 20-30 HMOs requiring licensing. This objective was achieved by using extra resources from the Regional Capital Housing Pot.

A successfully achieved objective has been the reestablishment of the Landlords' Forum, which is growing in popularity. The Forum has recently been accompanied by 'Ahead of the Game' the Redditch Landlords' Newsletter which goes out to in excess of 400 landlords. The Forum has been a useful aide in promoting the Midland Landlord Accreditation Scheme (MLAS). This Midland wide scheme has accredited almost 1000 landlords including 21 operating in Redditch.

However some areas still require work, and due to lack of resources some objectives, including those given a high priority are yet to be fulfilled:

- 1. To have a Private Sector Housing Team with adequately and appropriately skilled staff, given a high priority has not been completed. Lack of staff resources has impacted on the delivery of 2004 Strategy's Action Plan. A review of the private sector housing function is still required, is still considered to be a high priority.
- 3. A new systematic approach to inspection and enforcement in the private sector, this was given a *high* priority and has not been completed. This strategy still recognises this as high priority and it is in the action plan.
- 5. An accreditation system in partnership with local landlords, given a *low* priority. A scheme has been developed, however is yet to be fully implemented. Phase one of this scheme MLAS training and development of landlords has been implemented. Phase two the property accreditation scheme is pending introduction.
- 6. A formal approach to returning Empty Properties back to use, given a *medium* priority has been developed, but is yet to be fully implemented.
- 8. An agreement with a specialist financial provider to offer a range of equity release and similar financial packages, given a *medium* priority wasn't completed due to the Financial Service Authority requirements in local authorities providing financial advice regarding equity release. What has been developed are lifetime loans and the current review of the HIA which will introduce the Kickstart scheme. For those households experiencing financial exclusion and not eligible for lifetime grants the action plan seeks to develop a scheme with the Credit Union to

encourage households to save, then be in a position to borrow money for home improvements.

These objectives some modified still need to be met. The implementation of the accreditation scheme has been upgraded to a high priority because the scheme has been developed and approved by council and the risk of not completely rolling this out has an impact on vulnerable households.

Where do we want to be?

The evidence tells us that we should be working on the following:

A. Priorities from consultation

The top three priorities from the survey of private sector tenants, landlords and owner occupiers are:

- 1. Provide assistance to low-income households on property maintenance and helping arrange subsidised loans.
- 2. Helping older people and people with disabilities live independently in their own homes by providing stairlifts, wider doorways, ramps etc.
- 3. Returning empty properties to use.

The existing private sector housing team and the Care and Repair Agency are already working to meet these priorities, but can expand these, such as looking at ways of supporting households that don't qualify for lifetime loans, and ensuring the existing schemes operated by the council are publicised in the best way possible.

B. Priorities emerging from research

- Operating a proactive service, with a systematic approach that concentrates on areas identified by BRE research as in greater need. A strategic approach to inspection that moves away from the current complaint led approach.
- Devise a system to complete the HHSRS inspection of licensed HMOs
- Identify other multi-occupied properties which are non-licensable and investigate a procedure for ensuring compliance with requisite standards.
- Develop a targeted approach using the BRE data for the promotion of grants schemes for energy efficiency and lifetime loans for properties in need of repair.
- Work with landlords that own pre 1919 properties in the town centre areas to ensure that the buildings are as energy efficient as possible.
- Develop a policy and procedure to protect private tenants from harassment and illegal eviction from their landlords.

- Investigate providing assistance to low-income households on property maintenance and helping arrange subsidised loans. Look at developing a scheme with Black Pear (Worcestershire Credit Union).
- Promote lifetime grants to vulnerable households so that these households are aware of assistance available to them for home improvement works.

C. Building upon existing resources

It is recognised at all tiers of Government that local authorities need to work alongside landlords to encourage better standards of property management. Using the Redditch Property Accreditation Scheme (PAS) this council can achieve this goal. The scheme has a two tier approach to accrediting landlords. The first stage is about training and continuous professional development of the private landlord and the second stage is about ensuring property standards meet the decent homes standard. Redditch Borough Council utilise the Midland Landlord Accreditation Scheme (MLAS) for the first stage, and to date have 21 landlords, that operate in the area are MLAS approved.

The Redditch PAS has not yet been implemented, and it is proposed that a pilot is run on the second stage to test the resource requirements. Once this scheme is fully functioning the aim is that all private sector referrals of vulnerable applicants would be to Redditch PAS properties.

The private sector housing team currently deal with complaints from private tenants on unfitness, overcrowding and harassment and illegal eviction.

	07/08	08/09
Unfitness & Overcrowding	55	29
Harassment & Illegal Eviction	1	5

Note: due to the current system of recording complaints, not all incidents are reported above, these figures give an indication. The Housing Options team deal with a number of private landlord/tenant disputes in which they intervene and prevent homelessness.

Conclusion

Central Government recognises the importance of a thriving private sector, and looks to local authorities to support this. Redditch Borough Council has already developed some outstanding initiatives to improve conditions in the private sector. To continue to make a real difference the objectives outlined in the action plan at Appendix 1 now need to be implemented.

Appendix 1 Action Plan

What will we do?	Priority	When will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome?	What would success look like?	Comments
1.1 Fully implement Redditch Property Accreditation Scheme	HIGH The council relies heavily on the private landlords for housing applicants. Once implemented this scheme would ensure	Stage 1 April 2011 Stage 2 April 2011	Private sector housing team	Existing Resources	1. Ensure 100% of landlords used by Hsg Options are MLAS accredited 2.Staff resources in place to operate Redditch PAS – admin and inspections carried out by PSHT	April 2011 Only use MLAS accredited landlords in Hsg Options April 2011 have the staff in place to properly administer and inspect the PAS.	In 10 years have 75% of vulnerable referrals living in decent homes	Scheme already developed and agreed by council, this now needs to be fully implemented
	that vulnerable housing applicants are housed in decent private sector homes.	Stage 3 April 2020			3. Ensure that 75% of vulnerable applicants housed in the private sector are housed in Redditch PAS properties	By April 2020 use PAS properties for 75% of vulnerable referrals		

What will we do?	Priority	When will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome ?	What would success look like?	Comments
1.2 Develop a systematic approach to the inspection of licensable HMOs and the reissue of licenses	HIGH This is a legal requirem ent under the Housing Act 2004	April 2011	Private Sector Housing Team	Use data of existing licensed HMOS and CT records to ensure licenses in place. Then set plan for renewal process.	1. Look at hot spot areas as identified by BRE survey 2. Complete the HHSRS inspection of licensable HMOs (5 year period) 3. Devise a system to check licence conditions and reinspect HMOs. Self assessment for MLAS landlords 4. Have system for proactive inspection	To have a system in place for proactively identifying licensable HMOs	To have licensed 90% of projected licensable HMOs	Local authorities have a mandatory duty to licence and proactively seek licensable HMOs
1.3 Fully implement the Empty Homes Strategy	HIGH Essential housing resource s could be wasted without delivering the empty homes strategy	April 2011	Private sector housing team Housing Enabling Officer	Existing Resources	1. Have a dedicated role within an existing job dealing with empty homes. 2. Set up a system of recording and monitoring progress. 3. Targeted approach e.g. tackle dwellings with 2-3 bedrooms or with finance outstanding, links to mortgage rescue 4. Work with private landlords/RSLs to bring empty homes back into stock	Bring 90 empty homes back into use by 31 st March 2011		The strategy has already been approved by council. Bringing back empty homes into use has many benefits including: Reducing pressure on housing waiting list Reducing anti- social behaviour Utilising a wasted resource

What will we do?	Priority	When will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome ?	What would success look like?	Comments
1.4 Target areas with greatest need of support to improve thermal efficiency and fuel poverty	HIGH Central ward has a very high level (30%) of dwellings with inadequate thermal comfort and 22% in fuel poverty.	April 2013	Private Sector Housing Team Care and Repair Act on Energy	Existing Resources	Use the Warmer Worcestershire data combined with the BRE stock modelling data to identify streets in greatest need	National Indicators 186, 187 and 188	Achieved LAA NI target	
1.5 Investigate what assistance can be given to off grid properties in rural areas.	Properties off mains gas can be expensive to heat	April 2012	Private sector housing team	Existing Resources	1. Identify which properties are off gas 2. What schemes are available through suppliers (Eon scheme)? 3. What are other LAs doing? 4. Investigate external funding opportunities	National Indicators 186, 187 and 188	To have assisted in reducing the fuel bills for 10% of properties in these areas.	

What will we do?	Priority	Whe n will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome?	What would success look like?	Comments
1.6 Provide assistance to low- income households with property maintenance and helping arrange subsidised loans. Help older people and people with disabilities live independently in their own homes	High	Ong oing	HIA	Existing HIA resources, Kickstart funding	Complete HIA review	To deliver support services to qualifying Redditch households	Qualifying households to be given assistance where needed	
1.7 Explore and implement database system for recording PSHT work	High The current database(s) for recording is ad hoc. Uses 4 different computer systems, it doesn't show a true relection of complaints, inspections and work carried out within this team	April 2011	Private sector housing team	Existing Resources	Investigate what systems other LAs use – BDC Assess RBC needs Get quotes Report findings with recommendations Implement new system	To have suitable IT system for recording and reporting on Private sector housing inspections, actions etc. The system should be suitable for recording HHSRS inspections	PSHT to be trained on system. The system should allow the team to record and analyse all types of complaints and inspections	

2. Give sup	port and a	advice t	o private s	ector ten	ants and vulnerable own	er occupiers		
What will we do?	Priority	When will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome ?	What would success look like?	Comments
2.1 Promote available grants, lifetime loans and support, schemes to Central (pre 1919 properties), Astwood Bank and Feckenham.	HIGH These two wards have the poorest stock condition	Ongoing	Private sector housing team Care and Repair	Existing Resources	Use BRE data to identify areas in greatest need. Design promotional campaign e.g. work with Local/Village shops, Parish Council meetings, landlords Forum	An increased take up of lifetime loans and energy efficiency grants from residents in pre 1919 dwellings	To get maximum take up on loans and grants schemes	
2.2 Identify vulnerable private sector households, and promote energy efficiency grants, lifetime loans, and support.	HIGH Not all vulnerable households take advantage of the support available to improve property condition and reduce fuel poverty	Ongoing	Private Sector Housing Team Care and Repair	Existing Resources	Obtain data from CT records for those households in receipt of CT benefit and then promote lifetime loans to these households.	An increased take up of lifetime loans and energy efficiency grants from those deemed as vulnerable (in receipt of qualifying benefits)	To get maximum take up on loans and grants schemes	Commended by Care and Repair opt 09 1
2.3 Work with Redditch Credit Union or similar to develop a savings scheme for low income households to pay for home improvements	MED Households that are financially excluded from banks and/or don't have enough	April 2011	Private sector housing team Care and Repair	Within existing resources	Get data from C+R on applicants that didn't meet criteria for Lifetime loans. Look at hot spot areas on BRE maps, particularly former RTB, identify areas in greatest need Explore funding opportunities to kickstart savings plan with CU Develop and get scheme	To have 10 low-income households on savings scheme for the purpose funding of property maintenance	To have assisted 3 households with subsidised loans for home improvements	Easily achieved with minimum resource

	income to pay to repairs and not on qualifying benefits for lifetime loans would benefit from assistance from the CU				approved 5. Produce promo through website and target areas of highest need			
2.4 Develop a protocol with the Police for taking action in cases of serious nuisance in privately rented properties under the Criminal Justice and Immigration Act 2008	If a case arises where action under this act is appropriate it would help if a protocol had been agreed with the Police	April 2012	Private sector housing team	Existing Resources	Research Criminal justice and immigration Act 2008? What are other Las doing? Consultation with Police and relevant officers Agree protocol with the Police	To have agreed policy and procedure in place	For relevant officers to be trained in new policy and procedure so that if situation occurs where appropriate to use, officers confident to take this cause of action.	Page 181

What will we do?	Priority	When will we do it by?	Who will deliver this?	Resourc es Needed	Milestones	Target/Outco me?	What would success look like?	Commen ts
2.5 Develop a proactive approach to liaising with and educating private tenants	MED The Council assists many vulnerable tenants that have had bad experience s in the private rented sector	April 2012	Private sector housing team Housing Options Link Worker Reddi centre	Existing Resource s	1. Develop training and guidance for private tenants and YMCA tenants looking to move into private sector to incorporate budgeting and tenants rights and responsibilities 2. Produce leaflets/booklets available on RBC website 3. Link to a private tenants passport/accredited tenants scheme	A reduction in complaints from private sector tenants	A better understanding by private tenants of their rights and responsibilities resulting in more tenancies sustained, greater financial stability, less debt, a thriving private sector and less homeless applicants Vulnerable young people being more equipped to manage any tenancy, including private sector	
2.6 Develop a procedure for dealing with harassment and illegal eviction	MED Councils have power to start legal proceeding s under the relevant legislation. There is currently no corporate system in place for dealing with such cases.	October 2011	Private sector housing team Housing Options	Existing Resource s	June 2010 to have central reporting system in place on shared drive, used by trained staff in OSS/HO/PSHT April 2011 to have policy and procedure approved October 2011 to have completed training on new procedure	Procedure to be implemented and staff involved to have been trained by Oct 2011	Staff, private landlords and tenants to have been trained in how to deal with situations of possible harassment and illegal eviction. This should result in greater landlord knowledge, tenant empowerment and less homeless cases.	

What will we do?	Priority	When will we do it by?	Who will deliver this?	Resources Needed	Milestones	Target/Outcome?	What would success look like?	Comments
2.7 Produce tenants handbook	MED Private tenants and landlords would benefit from guidance on rights and responsibil ities with local support informatio n.	October 2010	Private sector housing team	Budget for printing required – within existing resources	1. Produce document in consultation with tenants, landlords, YMCA, Housing Options 2. The Homestamp Read this First booklet	October 2010 have document ready for distribution	Every tenant going into private accommodation through RBC to be used with a handbook Every MLAS landlord to distribute these at sign up Handbook available on website for download Handbook used as a training tool for YMCA and Inspire project CAB and YMCA to stock handbook	This is easily achieved within existing resources

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Appendix 2: Indicator definitions

The Decent Homes Standard

This section gives a detailed definition of the decent home standard and explains the four criteria that a decent home is required to meet. These are:

- it meets the current statutory minimum standard for housing;
- it is in a reasonable state of repair;
- it has reasonably modern facilities and services;
- it provides a reasonable degree of thermal comfort.

The decent home definition provides a minimum standard. Landlords and owners doing work on their properties may well find it appropriate to take the dwellings above this minimum standard.

Criterion A: the dwelling meets the current statutory minimum standard for housing

The purpose of the HHSRS assessment is not to set a standard but to generate objective information in order to determine and inform enforcement decisions. The guidance on inspections and assessments is contained in the Operating Guidance. This is an extensive document and can be found at http://www.communities.gov.uk/index.asp?id=1161785.

HHSRS assesses twenty nine categories of housing hazard, including factors which were not covered or were covered inadequately by the housing fitness standard. It provides a rating for each hazard. It does not provide a single rating for the dwelling as a whole or, in the case of multiply occupied dwellings, for the building as a whole. A hazard rating is expressed though a numerical score, which falls within a band. There are 10 bands. Scores in Bands A to C are Category 1 hazards. Scores in Bands D to J are Category 2 hazards.

The hazards that can be assessed are those associated with or arising from:

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Physiological Requirements	Protection Against Infection
Damp and mould growth	Domestic hygiene, pests and refuse
Excess cold	Food safety
Excess heat	Personal hygiene, sanitation and drainage
Asbestos (and MMF)	Water supply for domestic purpose
Biocides	Protection Against Accidents
Carbon monoxide and fuel combustion products	Falls associated with baths
Lead	Falling on level surfaces
Radiation	Falling on etc
Uncombusted fuel gas	Falling between levels
Volatile Organic Compounds	Electrical hazards
	Fire
Psychological Requirements	Flames, hot surfaces
Crowding and space	Collision and entrapment
Entry by intruders	Explosions
Lighting	Position and operability of amenities
Noise	Structural collapse and failing elements

The HHSRS assessment is based on the risk to the potential occupant who is most vulnerable to that hazard. For example, stairs constitute a greater risk to the elderly, so for assessing hazards relating to stairs they are considered the most vulnerable. The very young as well as the elderly are susceptible to low temperatures. A dwelling that is safe for those most vulnerable to a hazard is safe for all.

Action by authorities is based on a three-stage consideration: (a) the hazard rating determined under an HHSRS assessment; (b) whether the authority has a duty or power to act, determined by the presence of a hazard above or below a threshold prescribed by Regulations (Category 1 and Category 2 hazards); and (c) the authority's judgement as to the most appropriate course of action to deal with the hazard.

The threshold above which a hazard becomes a Category 1 hazard is currently a hazard rating score of 1,000.

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Criterion B: the dwelling is in a reasonable state of repair

A dwelling satisfies this criterion unless:

- one or more key building components are old and, because of their condition, need replacing or major repair; or
- two or more other building components are old and, because of their condition, need replacement or major repair.

BUILDING COMPONENTS

Building components are the structural parts of a dwelling (e.g. wall structure, roof structure), other external elements (e.g. roof covering, chimneys) and internal services and amenities (e.g. kitchens, heating systems).

Key building components are those which, if in poor condition, could have an *immediate* impact on the integrity of the building and cause further deterioration in other components. They are the external components plus internal components that have potential safety implications and include:

- External Walls
- Roof structure and covering
- Windows/doors
- Chimneys
- Central heating boilers
- Gas fires
- Storage Heaters
- Electrics

If any of these components are old and need replacing, or require immediate major repair, then the dwelling is not in a reasonable state of repair and remedial action is required.

Other building components are those that have a less immediate impact on the integrity of the dwelling. Their combined effect is therefore considered, with a dwelling not in a reasonable state of repair if 2 or more are old and need replacing or require immediate major repair.

'OLD' AND IN 'POOR CONDITION'

A component is defined as 'old' if it is older than its expected or standard lifetime. The component lifetimes used are consistent with those used for resource allocation to local authorities and are listed at the end of this appendix. Components are in 'poor condition' if they need major work, either full replacement or major repair. The definitions used for different components are as listed at the end of this appendix.

One or more key components, or two or more other components, must be both old and in poor condition to render the dwelling non-decent on grounds of disrepair. Components that are old but in good condition or in poor condition but not old would not, in themselves, cause the dwelling to

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fail the standard. Thus for example a bathroom with facilities which are old but still in good condition would not trigger failure on this criterion.

Where the disrepair is of a component affecting a block of flats, the flats that are classed as non decent are those directly affected by the disrepair.

Criterion C: The dwelling has reasonably modern facilities and services

A dwelling is considered not to meet this criterion if it lacks three or more of the

following facilities:

- a kitchen which is 20 years old or less;
- a kitchen with adequate space and layout;
- a bathroom which is 30 years old or less;
- an appropriately located bathroom and WC;
- adequate noise insulation;
- adequate size and layout of common entrance areas for blocks of flats.

The ages used to define the 'modern' kitchen and bathroom are less than those for the disrepair criterion. This is to take account of the modernity of kitchens and bathrooms, as well as their functionality and condition.

There is some flexibility inherent in this criterion, in that a dwelling has to fail on three criteria before failure of the decent homes standard itself. Such a dwelling does not have to be fully modernised for this criterion to be passed: it would be sufficient in many cases to deal with only one or two of the facilities that are contributing to the failure.

These standards are used to calculate the national standard and have been measured in the English House Condition Survey (EHCS) for many years. For example, in the EHCS:

- a kitchen failing on adequate space and layout would be one that was too small to contain all the required items (sink, cupboards, cooker space, worktops etc) appropriate to the size of the dwelling;
- an inappropriately located bathroom or WC is one where the main bathroom or WC is located in a bedroom or accessed through a bedroom (unless the bedroom is not used or the dwelling is for a single person). A dwelling would also fail if the main WC is external or located on a different floor to the nearest wash hand basin, or if a WC without a wash hand basin opens on to a kitchen in an inappropriate area, for example next to the food preparation area;
- inadequate insulation from external airborne noise would occur where there are problems with, for example, traffic (rail, road or aeroplanes) or factory noise. Reasonable insulation from these problems should be ensured through installation of double glazing;
- inadequate size and layout of common entrance areas for blocks of flats would occur where there is insufficient room to manoeuvre easily, for example where there are narrow access

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ways with awkward corners and turnings, steep staircases, inadequate landings, absence of handrails, low headroom etc.

Criterion D: the dwelling provides a reasonable degree of thermal comfort

The definition requires a dwelling to have both:

- efficient heating; and
- effective insulation.

Under this standard, efficient heating is defined as any gas or oil programmable central heating or electric storage heaters/programmable solid fuel or LPG central heating or similarly efficient heating systems1. Heating sources which provide less energy efficient options fail the decent home standard.

Because of the differences in efficiency between gas/oil heating systems and the other heating systems listed, the level of insulation that is appropriate also differs:

- For dwellings with gas/oil programmable heating, cavity wall insulation (if there are cavity walls that can be insulated effectively) or at least 50mm loft insulation (if there is loft space) is an effective package of insulation under the minimum standard set by the Department of Health;
- For dwellings heated by electric storage heaters/programmable solid fuel or LPG central heating a higher specification of insulation is required to meet the same standard: at least 200mm of loft insulation (if there is a loft) and cavity wall insulation (if there are cavity walls that can be insulated effectively).

Component lifetimes and definition of 'in poor condition' used in the national measurement of the disrepair criterion

COMPONENT LIFETIMES

Table B.1 shows the component lifetimes within the disrepair criterion to assess whether the building components are 'old'. These are used to construct the national estimates of the number of dwellings that are decent and those that fail.

Table D.1: Component lifetimes used in the disrepair criterion

Building components	Houses	All flats in	All flats in
(key components marked*)	and bungalows	blocks of below 6 storeys	blocks of 6 or more storeys
Wall structure*	80	80	80
Lintels*	60	60	60
Brickwork (spalling)*	30	30	30

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Wall finish*	60	60	30
Roof structure*	50	30	30
Chimney*	50	50	N/A
Windows*	40	30	30
External doors*	40	30	30
Kitchen	30	30	30
Bathrooms	40	40	40
Heating – central heating gas boiler*	15	15	15
Heating – central heating distribution system	40	40	40
Heating – other*	30	30	30
Electrical systems*	30	30	30

IN POOR CONDITION

Table B.2 sets out the definitions used within the disrepair criterion to identify whether building components are 'in poor condition'. These are consistent with EHCS definitions and will be the standard used to monitor progress nationally through the EHCS. The general line used in the EHCS is that, where a component requires some work, repair should be prescribed rather than replacement unless:

- the component is sufficiently damaged that it is impossible to repair;
- the component is unsuitable, and would be even it were repaired, either because the
 material has deteriorated or because the component was never suitable; (for external
 components) even if the component were repaired now, it would still need to be replaced
 within 5 years.

Table B.2: Component lifetimes used in the disrepair criterion

	Definition of 'in poor condition' used in EHCS
Wall structure	Replace 10% or more or repair 30% or more
Wall finish	Replace/repoint/renew 50% or more
Chimneys	1 chimney needs partial rebuilding or more
Roof structure	Replace 10% or more to strengthen 30% or more
Roof covering	Replace or isolated repairs to 50% or more

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Windows	Replace at least one window or repair/replace sash or member to at least two (excluding easing sashes, reglazing painting)
External doors	Replace at least one
Kitchen	Major repair or replace 3 or more items out of the 6 (cold water drinking supply, hot water, sink, cooking provision, cupboards
Bathroom	Major repair or replace 2 or more items (bath, wash hand basin,
Electrical system	Replace or major repair to system

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SAP Rating

SAP is the UK Government's standard methodology for home energy cost ratings. SAP ratings allow comparisons of energy efficiency to be made, and can show the likely improvements to a dwelling in terms of energy use. The Building Regulations require a SAP assessment to be carried out for all new dwellings and conversions. Local authorities, housing associations, and other landlords also use SAP ratings to estimate the energy efficiency of existing housing. The version on which the SAP<35 model is based is SAP 2005.

The SAP ratings give a measure of the annual unit energy cost of space and water heating for the dwelling under a standard regime, assuming specific heating patterns and room temperatures. The fuel prices used are averaged over the previous three years across all regions in the UK. The SAP takes into account a range of factors that contribute to energy efficiency, which include:

- thermal insulation of the building fabric;
- the shape and exposed surfaces of the dwelling;
- efficiency and control of the heating system;
- the fuel used for space and water heating;
- ventilation and solar gain characteristics of the dwelling.

SAP is not affected by the individual characteristics of the household occupying the dwelling or by the geographical location.

SAP scale

The SAP rating is expressed on a logarithmic scale, which normally runs from 1 (very inefficient) to 100 (very efficient).

Fuel Poverty

A household is said to be in fuel poverty if it needs to spend more than 10% of its income on fuel to maintain an adequate level of warmth (usually defined as 21 degrees for the main living area, and 18 degrees for other occupied rooms). This broad definition of fuel costs also includes modelled spending on water heating, lights, appliances and cooking.

The Fuel Poverty Ratio is defined as:

If this ratio is greater than 0.1 then the household is counted as being in Fuel Poverty.

Income

Two different classifications of incomes are used, and from these two different fuel poverty ratios are calculated. The official headline figure uses the full income definition whilst the basic income

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definition is also produced. For both definitions, income is measured net of income tax and national insurance.

- The basic income is a measure of household income and is calculated by adding the personal incomes of every member of the household together plus any benefit payments that the household receives (from private source, state benefits and savings) but excludes income related directly to housing;
- The full income definition is the official headline figure. In addition to the basic income measure, it includes income related directly to housing (i.e. Housing benefit, Income Support for Mortgage Interest (ISMI), Mortgage Payment Protection Insurance (MPPI), Council Tax Benefit (CTB).

Fuel Costs

Fuel costs are modelled, rather than based on actual spending. They are calculated by combining the fuel requirements of the household with the corresponding fuel prices. The key goal in the modelling is to make sure that the household achieves the adequate level of warmth set out in the definition of fuel poverty whilst also meeting their other domestic fuel requirements.

Vulnerable households

The term vulnerable can take on a number of meanings. The indicator used for the 2006 model includes households who were in receipt of the following benefits:

- Income support
- Housing benefit
- Council tax benefit
- Income based job seekers allowance
- Disability living allowance : Care Component
- Disability living allowance : Mobility Component
- Pension Credit
- Attendance allowance
- Industrial Injuries Disablement benefit
- War disablement pension
- When income below £15,050
 - Working tax credit and in receipt of a disability premium
 - Child tax credit

Predicting Housing Conditions

Every local authority housing officer needs to be able to target the worst areas. Robert Flynn explains how techniques developed by the Building Research Establishment can assist local authorities undertaking local house condition surveys and add value to existing data.

The full text of this article was originally published in the January edition of the Environmental Health Journal





Part of the process of designing house condition survey contracts is explaining to councillors and senior officers how impossible it is to provide the ward data they covet with any accuracy unless huge and economically unjustifiable samples are selected. It is more typical for authorities to use smaller, less expensive samples and then divide the area into three or four groups of wards for reporting purposes. While this might be sounder statistically, it is, and remains, of little value for targeting purposes. Occasionally, areas where problems are suspected can be surveyed using larger samples but this is rarely a complete solution. Because they are so expensive, surveys cover several purposes and a sample, which is suitable for one purpose eg unfitness, may be unsuitable for another such as fuel poverty.

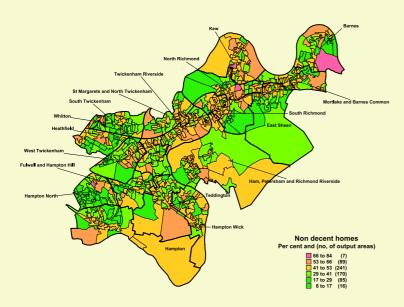
Recognising these problems, Chris Jarvis at the Greater London Authority, who advises London boroughs on local stock condition data gathering and Simon Nicol, director of the Building Research Establishment's Housing Centre had considered using English House Condition Survey (EHCS) data, which the BRE analyses for the Office of the Deputy Prime Minister, to produce a mathematical model to predict local housing conditions. In 2002, the BRE was successful in its bid to the Foundation for the Built Environment for a grant to fund the development of a local housing stock model.

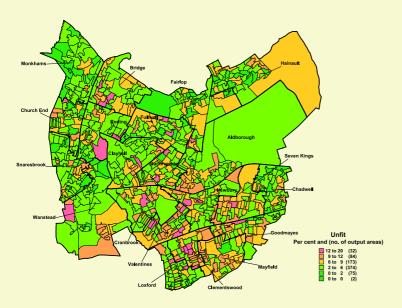
Eighteen months on, the BRE has designed a series of models which have taken EHCS 2001 data and combined it with data sources with national coverage (such as the census) to produce detailed maps for key indicators, notably non decent homes. BRE's initial development partner, the London Borough of Richmond provided invaluable feedback on ward data supplied by the preliminary models. This paved the way for the next stage in model development, which resulted in maps (see figures 1 and 2) that show typical outputs from the models for a local authority area (in this case non decent homes for the London Borough of Richmond and unfitness for the London Borough of Redbridge). Figures 1 and 2 show the percentage of non decent and unfit homes by census output area and statistical ward while box 1 (see over) provides a description of census output areas and statistical wards.

So far, the BRE has produced models for:

- dwellings which fail the decent homes standard;
- dwellings which fail the decent homes standard due to unfitness, inadequate thermal comfort, disrepair and non-modern facilities and services;
- non decent homes occupied by a vulnerable household;
- households in fuel poverty; and
- dwellings with a SAP rating less than 30.

Each model produces predictions of the percentages for each variable at the level of the local authority, the statistical ward and the census output area. The BRE was able to do this by using a method called CHAID, which is short for Chi-squared Automatic Interaction Detector.





Census geography

Census output areas: these are now the smallest geographical unit the census reports on. They were intended to have similar population sizes and be as socially homogenous as possible (based on tenure of household and dwelling type), avoid urban/rural mixes and irregular shapes and tended to be constrained by obvious boundaries such as major roads. The specified minimum size was 40 households to ensure the confidentiality of data and the recommended size above 125 households.

Statistical wards: census output areas in England and Wales have been designed to fit into 2003 statistical wards, which reflect administrative boundaries promulgated (laid down in statute) by 31 December 2002. Most 2001 census outputs however, use Census Area Statistics (CAS) wards – these are a subset of 2003 statistical wards, with particularly small wards merged to protect data confidentiality.

The method as the BRE used it can be broken downs into six stages:

- Select the dependent variable ie the EHCS statistic that is intended for modelling down to local level eg non decent homes.
- Prepare and establish links between national small area databases eg census and the EHCS data.
- Select the independent variables eg for non decent homes, any that may be related to the level of non decent homes such as dwelling type from the census, bearing in mind that one of the advantages of CHAID is it can accept large numbers of independent variables.
- Carry out the CHAID analysis. This is done using a computer programme called AnswerTree, which splits the database into groups that maximise the differences between them for each variable. This results in a diagram in the shape of an inverted tree with splits occurring at nodes (see figure 3). The independent variables that have greatest influence on the dependent variable are found at the top of the diagram. Once the differences become too small to be useful the programme stops splitting the database at what is known as a terminal node.
- The terminal nodes give predicted percentages for the dependent variable eg non decent homes, which can be assigned to every census output area in England.
- The percentages can then be summed to provide results to statistical ward and local authority level.

These six stages describe the process for the non decent homes model but each of the models was developed in a similar way.

While this may sound reasonably straightforward the process of preparing the data was a long and tortuous one of matching datasets that were difficult to reconcile. Until the 2001 census data and other related datasets arrived in August 2003, the BRE found it had been extraordinarily difficult to assemble the data in a usable format, which made it hard to establish whether the technique was yielding results of any real value. Now that the data has now been assembled and the models produce results, how reliable are they?

Before answering this question, it ought to be said that CHAID is considered to be a stage towards developing models rather than a tool, which produces a fully developed model. However, the results appear to be sufficiently encouraging to start making use of them.

The BRE has now supplied the models to two London authorities, Richmond and Redbridge, and their initial reactions have been very positive. Nevertheless, positive reactions are not proof of a model. The big problem has been and remains how can the models be proved when there is very little evidence to test against them? Furthermore, what should be regarded as proof?

To verify the models, the BRE has followed four approaches:

Comparison with private sector house condition surveys. The results have been encouraging with survey data showing good agreement with the unfitness and disrepair models. The comparisons have, however, been limited to highly targeted surveys that yielded data for a few wards.

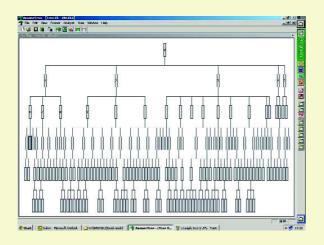


Figure 3: AnswerTree diagram illustrating how CHAID splits the data for non decent homes

Ward	Unfit (per cent)	
	Modelled 2001 data	1996 Survey
Clementswood	8	12
Valentines	8	12
Seven Kings	7	10
Mayfield	7	10
Newbury	6	10
Bridge	6	8
Cranbrook	6	8
Goodmayes	6	10
Aldborough	6	8
Fullwell	5	8
Clayhall	5	8
Barkingside	5	8
Church End	5	10
Wanstead	5	10
Roding	5	8
Loxford	5	12
Snaresbrook	5	8
Fairlop	5	8
Chadwell	4	8
Hainault	4	8
Monkhams	3	8
Borough	6	9

Table 1: Unfit dwellings: modelled and 1996 survey data

- Comparison with self-completion energy questionnaires. The problem of small samples is bound to dog any attempt at verification, so the large responses achieved by self completion energy questionnaires presented a means of verifying the SAP and fuel poverty models. However, in the one case where the BRE attempted this it found that problems of data quality and bias precluded their use at ward level or below.
- Comparison with data supplied by an energy company. The BRE used this information to develop a surrogate fuel poverty indicator, which had a correlation coefficient of 0.4 with the BRE's fuel poverty model. For the complex mix of social and physical data that make up the measure of fuel poverty the BRE felt that this was a good result at the level of the census output area. Certainly the fuel poverty model would have been of assistance in targeting the fuel poor in this local authority.
- Comparison with data supplied by specific local authority partners. The BRE was fortunate to be provided with good quality information by both of its local authority partners.
 As the data supplied by the London Borough of Redbridge provides the most recent comparison, it is important to consider this case in some detail.

The main statistic the London Borough of Redbridge provided was unfitness. Officers from the borough carried out high quality fieldwork for a 1996 survey, which was analysed by a team from the then London Research Centre. The wards were put into three groups for reporting purposes. The modelled data and the 1996 survey data are included in table 1.

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There are four important points that should be made at this stage:

- there was a 3 per cent decline in unfitness nationally between 1996 and 2001. If a similar decline took place in the London Borough of Redbridge then the modelled data is very close to the survey data;
- the modelled data tends to result in smoother data and therefore narrower ranges. The rank order is therefore of greater importance when making comparisons than the actual value predicted;
- the grouping imposed by the 1996 survey may mask real differences between wards within the groups; and
- the model includes all tenures whereas the 1996 survey excludes the social rented sector.

There are two very obvious areas of agreement between the model and the survey:

- two out of the three worst wards from the 1996 survey were predicted to be the worst and second worst wards by the model; and
- four out of the six wards in the second worst group of wards from the 1996 data were placed in the next six places.

This indicates a fairly good agreement between the model and the survey data at ward level although differences do exist.

The only other area comparison that could be made with the survey data was between substantial disrepair in the 1996 survey and the disrepair component of decent homes. While there are differences between these two measures they are sufficiently similar that a good agreement on rank order would be expected. In fact the disrepair model performed slightly better than the unfitness model and there was close agreement with the survey data.

So far, users of the models have been less interested in the reports of the BRE's attempts at verification than in their own gut reactions to data provided for them. The maps in particular provide an easily assimilated impression of the predicted conditions, which result in a rapid and usually positive response.

As we near the end of the FBE-funded project, the BRE is considering how the knowledge gained might best be taken forward. The options include:

- seeking funding to develop the CHAID analysis into more formalised models using techniques such as logistic regression;
- seeking partners to provide good quality data to help verify the models;
- providing a service to authorities using the existing models; and
- developing models for other EHCS variables such as the housing health and safety rating.

The techniques described are primarily intended for use before a local survey has been carried out. This supports ODPM guidance [1], which promotes the ideal of using all available data sources to understand the local housing stock before commissioning a survey. Most of the BRE's efforts have therefore concentrated on developing a tool that will be of use before commissioning a survey. However, the question that is inevitably asked is, can this be used instead of a survey? This depends on what the purpose of the survey is. If all that is required is a strategic overview of conditions in an authority to inform a housing strategy, then this will probably suffice in the short term. The results could then be used to stratify future survey samples to target areas of interest in a much more focused way, possibly in the form of a rolling programme. Authority-wide results could still be achieved by including small samples in the areas of lesser interest.

This is not to say that the outputs of the models should be approached uncritically but neither should local data sources or the received wisdom on local conditions. The models merely add to a cocktail of information that needs to be considered in developing a strategy.

There is one other area that may prove to have as much potential as those already mentioned. A lot of good local surveys are undertaken that are only prevented on reporting small area statistics by their small sample sizes. Where the authority has confidence in its data, there is no reason why it cannot be used in place of the EHCS data to model down to census output area level. This is more time consuming than using the national model as the CHAID analysis has to be repeated, but if the local data quality is good then it should provide a more accurate picture of local conditions. This means that these techniques are of potential interest not only to authorities about to embark on surveys but also those looking to gain added value from their existing data.

Reference

1 Collecting, managing and using housing stock information: a good practice guide, ODPM 2000.

Further information

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