Brighton & Hove City Council: Value for Money Programme

Housing Report



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Introduction

- 1. As part of improving our performance on the use of resources, the council is undertaking a corporate Value for Money (VfM) Programme looking at comparative spend on all leading service areas in a 12 month period.
- 2. This report focuses on VfM 'hot spot' areas within Housing and potential improvement opportunities. The action plan on page 16-19 provides an overview of the review findings and recommendations.
- 3. Brighton & Hove City Council's Housing division is composed of two services; Housing Strategy and Housing Management. The service as a whole achieved 3 out of 4 in the 2007 CPA assessment (comprising of 4:4 for Housing Strategy and 2:4 for Housing Management). This report has been split into three sections; Housing Strategy, Housing Management and crosscutting issues. More detailed performance and comparison tables and charts can be found in appendix 1.
- 4. Housing Management is currently undergoing a major service transformation which it is anticipated will bring significant financial benefits and improved outcomes for service users and tenants. Changes currently underway include the development of a housing Local Delivery Vehicle (LDV), a innovative long-term partnering Procurement Strategy for the council's housing stock and a 3 year Service Improvement Plan for Housing Management. The second phase of LDV development has recently been approved by Cabinet and this could bring in up to £45M in additional funding as well as improvements to units of temporary housing. The long term partnering contracts for the repairs and maintenance of the housing stock will commence in April 2010 and lead to substantial year on year savings in the council's maintenance costs. The 3 year Service Improvement plan will provide a new strategic focus and enable a service review with the aim of the overall unit cost of the service.

Approach

5. The approach is based on a good practice model developed by PricewaterhouseCoopers with review outputs including priorities for improvement and performance measures for monitoring and reporting. The focus of the review has been on analysing the service 'as is' rather than a detailed 'backward look' with an emphasis on developing a prioritised list of VfM opportunities that the service can begin to implement. The corporate methodology follows a five stage process detailed below:

Review stage	Key actions
1. Preparing for the review	 Agreeing scope Establishing review team Initial data gathering
2. Reviewing existing service provision	 Interviews with ADs & Heads of Service Analysis of data Analysis of best practise information
3. Prioritise areas of the service for improving VFM	 Analysis of data and interviews Development of VfM opportunities long-list
 Identify VFM improvement projects & final report 	 Opportunities short-listing workshop Development of report Reporting to VfM Steering Group
5. Target setting, monitoring and reporting	 Key deliverables and monitoring schedule agreed Start of implementation of quick-wins Development of transformation plan

A. Housing Strategy

6. Housing Strategy manages the council's strategic and community housing functions, including the following areas:

The Housing Strategy

- Housing Needs and Homelessness
- Temporary Accommodation
- Private Sector Housing
- Single Homelessness
- Supporting People
- 7. The net budget for 2008/9 is £6.1M (excluding support services costs). The service also manages the Supporting People grant which totals £12.5M for the same period. Housing Strategy has scored 4 out of 4 in recent CPA assessments. Supporting People was classed a 'good service with promising prospects for improvement' in a 2007 Audit Commission inspection. Brighton & Hove has well above average instances of homelessness and housing related problems. Housing is therefore a key priority for the council and this is reflected in the comparatively high level of funding in order to provide a high quality service.
- 8. Housing Strategy has taken account of Value for Money when planning and improving services through a service improvement exercises including a VfM review of Homeless spend and the strategic commissioning of services for single homeless people. Housing Strategy also manages services for people with Learning Difficulties and has made significant financial savings in this area. Learning Difficulties were included in the earlier VfM review of Adult Social Care are therefore not included in the scope of this review.

Homelessness and Temporary Accommodation

- 9. The Audit Commission VfM comparators identify BHCC second to top of its group from spend on homelessness per head of population (see appendix 1). Homelessness has traditionally been a key financial pressure for the council and the homeless budget was classed as a corporate critical budget. In the past this has been characterised as an intractable problem due to the high number of homeless people 'attracted' to the city and the higher than average size of the private rented sector.
- 10. The division has made considerable progress in developing a preventative approach to homelessness which has led to the budget no longer being classed as critical and improved outcomes for service users. The service has moved resources from dealing with statutory homelessness to supporting preventative actions and providing housing advice (and has the highest portion of overall spending on prevention amongst the authorities benchmarked in the Acclaim study below). Statutory homelessness acceptances have decreased from 925 in 2003/04 to 439 in 2007/8 (see appendix 1) and a reduction from 666 households in temporary

accommodation to 482 over the same period. Levels of homelessness prevention due to housing advice casework (BV213) remain top quartile compared to nearest neighbour authorities, and the council remains on track to meet the government's target to halve the number of households in temporary accommodation by 2010.

- 11. The service has recently undertaken a Value for Money exercise which included benchmarking led by Acclaim consulting. Acclaim used a comparator group based on London Boroughs which they argue have more similarities in terms of homelessness with Brighton & Hove than most authorities in the Audit Commission comparator group. BHCC compare well in the majority of areas of homelessness spend including:
 - Lowest unit costs per prevention (see appendix 1)
 - Low unit cost for emergency accommodation
 - The lowest annual cost for units of temporary accommodation.
- 12. The report also identified some areas where BHCC compares less favourably including the highest costs for storage in the group, high costs for non-block booked Bed & Breakfast and bottom quartile for percentage of people in Temporary Accommodation in Bed & Breakfast. The service has developed an action plan to address these issues.
- 13. The service has good partnership working with other BHCC directorates in the provision of housing need/homelessness support to Children and Young People's Trust (CYPT) and Adult Social Care (ASC). This has produced VfM benefits in providing a coordinated approach to housing need and temporary accommodation across the authority with improved procurement and less duplication of effort and spend. This has also improved outcomes for service users improving the timeliness and quality of temporary accommodation and its provision. More work need to be undertaken to identify the extent and financial benefits of this joint working. The Acclaim exercise identified that BHCC reporting used in the Audit Commission profiles includes non-statutory homelessness costs (particularly for ASC and CYPT). Exclusion would reduce from cost per head from £12 to closer to £7 and compare more favourably to the council's in the comparator group (see appendix 1).

Adaptations

- 14. The Private Sector Housing Team provide an adaptations service for council, housing association and private sector tenants, and owner occupiers. The annual adaptations budget is £750K for council tenants and £1M for others (provided through the Disabled Facilities Grant). The budget is in high demand and there is a waiting list of applicants.
- 15. The service has taken steps to ensure that housing options are considered at an early stage in the application processes so that a move to a more suitable adapted property is considered before expensive adaptations are undertaken. It is essential that this is further developed (in conjunction with ASC and

CYPT) to stop unnecessary waiting times and spend. Options to offer financial support to owner occupiers for moving to a more suitable property rather than adapting their existing home should also be investigated (as successfully used in Eastbourne and Hastings).

16. Adaptations have wider financial impacts. Time on the waiting list or adaptations to unsuitable properties can affect other service areas (e.g. need for Home Care whilst waiting or having to remove adaptations from unsuitable council properties once the resident has left). The Department for Local Government and Communities (DCLG) has presented a case for investing in adaptations in order to gain wider VfM benefits across council functions. Some initial work has been undertaken to develop a business case for BHCC, but further analysis needs to be completed to understand local costs and benefits. This work will continue and is included in the attached action plan.

Housing Strategy successes

17. Housing Strategy have successfully improved and developed some of their services to improve VfM and bring additional funding to the council. Recent successes include:

Supporting People

18. The Supporting People team have effectively developed their strategy in order to manage a reduction in their grant of 10% over 3 years. The service has improved its strategic approach to commissioning and managed (using a VfM tool) to increase the number of units of support it provides to vulnerable people within this reducing grant framework.

Single Homeless Integrated Support Pathway

- 19. The Single Homeless Team has managed the reduction in Supporting People funding whilst improving outcomes for single homeless people. The Integrated Support Pathway has aligned third sector organisations in the city to the council's strategic objectives and provided a higher level of support to enable single homeless people to gain employment and stable housing. This work has been recognised by the government as best practice and brought in additional funding.
- 20. Following the Supporting People Grant Announcement in January 2008, the Supporting People team were required to find savings of 11.5% over a three year period. This represented £776,827 from services within the 'Social Excluded Cluster Group', the majority of which sit within the Integrated Support Pathway.
- 21. In order to meet this savings target, and deliver new services identified as gaps in provision by the Supporting People Strategy Review, it was necessary to decommission some services that were not as closely aligned to the Supporting People Strategy as other services. The impact of the

decommissioning of these services is being mitigated through a combination of remodelling of existing services and exploring other move on options for service users whose complex needs cannot be met from within the Pathway.

BEST Private Sector Renewal funding

22. The Private Sector team have successfully led a regional bid for Private Sector Renewal funding. This has brought an additional £8M to the city which is being used to improve Private Sector properties.

B. Housing Management

- 23. Brighton & Hove Council owns around 12,000 council homes and manages 2,000 leasehold properties. The service was awarded 1 star out of a possible 3 in a 2005 inspection by the Audit commission and classed as 'a fair service with promising prospects for improvement'. The estimated cost of the service for 2008/9 is £46.2M. The service is funded through rent collection via the Housing Revenue Account (HRA).
- 24. In February 2007 Brighton & Hove tenants voted to retain the housing stock under the direct control of the council. This has resulted in a funding gap if the council is to bring all homes to meet the Decent Homes standard. Council officers and consultants have been working to reduce this funding gap with a programme of savings and a new 10 year Procurement Strategy. A large amount of council resource is already focused on addressing this issue and it has therefore been excluded from the scope of this review.

Unit costs and management structure

- 25. Unit costs for Housing Management are high at £17.28 cost per property for 2007/8. This puts BHCC close to the top quartile when compared to other local authorities. The service is making efforts to address this and unit cost has reduced from 2005/6 cost of £18.58 per property. Satisfaction amongst tenants is in the lowest quartile for Unitary Authorities at 72%.
- 26. Analysis of previous reviews and interviews with managers revealed concerns that the service's current structure is not effective. The current structure has dedicated teams for functions including rent collection, lettings and estate services, mixed with an area based tenancy management function. This has led to an element of confusion regarding lines of responsibility and inconsistencies in practices between areas (for example how Housing Officers deal with tenancy enforcement and interact with the dedicated teams). The resulting management structure is large to accommodate these responsibilities and therefore high cost. A new 3-year Service Improvement Plan for the service is currently under development and it is recommended that the service is responsibility and reduce unit costs.
- 27. Housing management has a devolved structure with separate access points for each of the management areas as well as for the repairs and specialist teams. This can mean that customer enquiries are often not resolved at first contact, whilst transaction costs are high and inefficiencies exist. The service would benefit from a customer access and business process review. This work should be linked to the council's corporate customer Access Strategy.

Repairs and Maintenance

28. Unit costs for maintenance are high and in the top quartile in the Audit Commission comparator group for 2006/7 (see appendix 1). However Housing Management costs fell to £17.37 in 2007/8 for the first time in several years from £18.82 in 2006/07. This was achieved through a reduction in responsive repairs, improved contracting/partnering and capitalisation of some costs. Work has also been undertaken to review all housing management assets and produce a prioritised model for improving the overall housing stock to meet the Brighton & Hove Standard.

29. The proposals in the Procurement Strategy for the repair and maintenance of the stock should lead to significant financial savings and improved outcomes for tenants. The service has also made VfM improvements to its current contracting arrangements (see point 33). However there is potential to gain efficiencies by joining contracts for works not covered by the 10 year agreements with other (non-housing) corporate contracts, for example lift maintenance, asbestos removal etc. Work should be undertaken to produce a forward plan of both corporate and housing contracts, and to tender them jointly where appropriate.

Income Collection

- 30. Income collection has seen a steady improvement since the establishment of the dedicated team. The team provide a more consistent and systematic approach than under previous arrangements where the function was devolved to area Housing Officers. Performance is now at 97.7% which has moved the council out of the bottom quartile for the first time in recent years and puts BHCC closer to the median when compared to other Unitary Authorities (see appendix 1).
- 31. There are opportunities for further improving performance and reducing the total amount of outstanding rent. The adoption of a 48 or 50 week rent year with those in arrears continuing to pay for 52 weeks has been effectively used by other providers. Other successful initiatives include marketing campaigns that emphasise the consequences of not paying rent. It is recommended that the council considers these examples of best practice in income collection.

Recharging

32. The authority is currently not maximising opportunities for recharging, for example properties that are left in poor condition and unauthorised repairs. Where recharges are made, payment is not always effectively pursued. Work should also be undertaken to ensure that those who leave properties in a state of disrepair or undertake unauthorised work on their homes are recharged, and that every effort is made to ensure that the outstanding charges are collected.

Housing Management successes

33. Housing management have successfully improved and developed some of their services:

Improved contracting

34. As well as developing the longer term Procurement Strategy, steps have been taken to improve current contracts and the service is working to develop an 'open book' approach with its key contractors. The service has made substantial savings through improved procurement; including a reduction in the unit cost from £4,779 to £3,100 for kitchens and from £2,800 to £1,780 for bathrooms between 2006/7 and 2007/8. Substantial savings have also been made in procurement of doors through the London Housing Consortia and improvements to cyclical repairs and redecorations.

Empty properties

35. Significant improvements have been achieved in empty property turn-around times. The average turn around time has been reduced over the past year, dropping from 35 days in 2006/7 to 31 in 2007/8 (see appendix 1). This results in people moving out of temporary or unsuitable accommodation more quickly and has a positive impact on the Bed & Breakfast budget. There is also a reduction in the amount of rent 'lost' through vacancy.

Estate Services review

36. A review of Estate Services is underway to look at the future provision of the service. The review has followed the recommendations made by tenants through councillor led focus groups and has already resulted in developments to the service that have been widely supported.

C. Cross cutting issues

37. A number of areas have been identified that have VfM implications for both Housing Strategy and Housing Management:

Housing Green Paper

- 38. Proposals to develop a detailed business case to establish a Local Delivery Vehicle (LDV) as outlined in the government's Housing Green Paper have recently been agreed by councillors and tenants groups. The council is committed to creating an LDV without the involvement of a Registered Social Landlord, freehold transfers or the transfer of tenanted properties. As well as bringing additional investment the LDV is expected to bring wider social benefits by helping to meet housing need in the city.
- 39. Work has been undertaken by leading financial and legal experts who have concluded that there are a number of viable options to create a LDV in Brighton & Hove within these constraints. Financial modelling by PwC will help ensure that the LDV delivers value for money and indicates that significant financial benefits are achievable. PwC estimate that the LDV will generate up to £45M in additional funding for improving the council's housing stock.

Links between Housing Strategy and Management

- 40. Housing Strategy and Management are arranged as two separate services with little shared functions. The separation is partly due to the differing funding arrangements (HRA, General Fund and the Supporting People grant) and historical factors. The proposal to transfer Housing Management created a logical need to keep the services separate in order to make the transition as smooth as possible in the event of a 'yes' vote. The tenants' decision to retain the council as their landlord means that opportunities exist to increase and improve joint working across the services. The new Housing Strategy 2008-2013 provides the strategic framework for improvement in this area.
- 41. The division currently has multiple customer access points across both services. There is scope for better integration of these access points and joining-up elements of customer access in line with the strategic 'housing options' approach to addressing housing need. Opportunities also exist for learning from best practice across the services, for example Housing Strategy's VfM focused approach to service improvement and Housing Managements improvements in void turn-around times. It is recommended that opportunities for integrating teams and joining-up elements of customer access in line with the council's 'Access Vision' are reviewed.

<u>ICT</u>

- 42. Issues with ICT systems were identified across both divisions and ICT was often cited as not supporting business processes and hampering improvements to the service. Particular frustration related to the OHMS system which is used across both services. Benchmarking of Housing Management costs via the Housemark network identifies BHCC as having a higher percentage of overall spend on IT than many other providers (Based on 2004/5 data). Although ICT should not drive improvements in the service it is important that the ICT infrastructure is effective in supporting any new customer access initiatives, the new Service Improvement Plan and the delivery of the Procurement Strategy for Housing Management.
- 43. The service is yet to implement effective mobile working and an initial pilot failed due to difficulties linking current systems to the mobile solution. Mobile working has been used effectively by other providers to improve working practices and deliver efficiencies. Successful examples include Lewisham LBC who have delivered £120K per year saving through mobile working for surveyors and Peterborough City Council who used mobile solutions to help deliver £1.8M of savings. Further development of mobile working should be investigated, but it is essential that any future projects have a robust business case.
- 44. Processes across housing are often paper-based and records are mainly manually stored and retrieved. The service may benefit from participation in the corporate Electronic Document and Record Management (EDRM) programme. Work should be undertaken to produce a business case identifying areas of Housing that would benefit from inclusion in the programme, as well as identifying the costs involved and efficiencies that could be gained.

Sickness absence

- 45. Sickness absence figures show that Housing Strategy and Housing Management have high levels of sickness absence within the authority. There are a number of long-term absences, however short-term absences account for a significant portion of the overall figure. Sickness absence has VfM implications for staffing levels, service delivery, and use of agency staff.
- 46. The council has recently initiated a sickness absence pilot in which Housing have been identified as a participants. The pilot includes improvements to reporting and monitoring, HR support, use of Occupational Health, use of flexible working and training for HR and Housing managers. Initial analysis shows a positive impact of this initiative with significant reductions in sickness absence in Housing Management.

Agency Staff

- 47. Both housing divisions had high spend upon agency staff in 2007/8. Housing Strategy's agency costs were predominantly used to cover for sickness absence and deal with service peaks (e.g. summer months when the number of homeless enquiries increases). Housing Management's costs related primarily to cover for vacancies in the Estate Services team whilst it was under review, and some sheltered housing posts that have been difficult to recruit to permanently. Anecdotal evidence suggests that agency employees can sometimes provide better value for money than other options, however more work needs to be undertaken to identify actual costs and benefits. It is recommended that targets are set for reducing the annual spend on agency staff.
- 48. Housing Management is currently completing reviews of the estate service and of sheltered housing. An expected outcome of these reviews is the reduction in the use of agency staff.

Value for Money opportunities and action plan

49. The various VfM opportunities identified in the review have been grouped and summarised into a VfM action plan (starting on the next page). A workshop was held with senior Housing managers in order to prioritise the opportunities and agree timescales for the action plan.

 Performance measures Increase in customer satisfaction (Target increase by % Increase in number and use of access channels Reduction in duplication of access channels 	Spend on agency staff (Target = reduction by 25%)	 Housing Management Unit Cost (target = reduction by £4) 	 Cost of ICT as % of overall spend (target = reduction % of overall spend)
Timescale Review completed by end Mar 2009 Implementation start by May 2009	Cost benefit analysis by December 2008 Targets set for reporting in April 2009	Housing Management 3 year Service Improvement Plan agreed by November 2008 Service structures reviewed and redesign implemented during 2009	Initial review complete by November 2008 • Business Case for joining
Lead Nick Hibberd and Jugal Sharma	Nick Hibberd and Jugal Sharma	Nick Hibberd	Steve Corbett
Objective Housing wide review of customer access. Link to customer Access Vision. • Including Business Process Improvement work.	Evaluate costs and benefits of key areas of agency staff use. Set clear targets for reducing annual spend on agency staff and consultants.	Service redesign to reflect new strategic framework for Housing Management	Review of ICT needs, costs and options for future
VfM issue Links between Housing Management (HM) and Housing Strategy (HS) PRIORITY = HIGH	Use of agency staff PRIORITY = HIGH	Unit costs for housing management service PRIORITY = HIGH	ICT systems not always fit for purpose PRIORITY =
Ref H1	H2	НЗ	H4

October 2008

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Ref	VfM issue MEDIUM	Objective	Lead	Timescale corporate Electronic Document & Record Management May 2009 • Business case for mobile working development/pilot May 2009	Performance measures
H5	Income collection performance PRIORITY = MEDIUM	Implement measures to increase rent collection	David Rook	 Introduce 48 or 50 week rent year from April 2010 Focused rent arrears marketing strategy agreed by Mar 09. Marketing campaign during 2009/10 	 % of rent collected (target = increase by 0.5%)
HG	level of sickness absence PRIORITY = HIGH	Participate in Sickness absence pilot	Nick Hibberd and Jugal Sharma	Evaluation of sickness pilot by March 09	 Average days per employee (reduction in average number of days. Target = 9 days)
2H	Storage costs for Homeless households in TA PRIORITY = MEDIUM	Introduce charge for storage/or sign-post only	Steve Bulbeck and Sylvia Peckham	Storage recharging implemented by December 2008	 Storage costs (target = reduction in storage costs to at least average in benchmarking exercise)

VfM	VfM issue	Objective	Lead	Timescale	Performance measures
Adaptations (cross cutting impact CYPT and ASC) PRIORITY = HIGH	ss YPT Hi	Identify local costs, impact and potential VfM benefits of changing policies and spend on adaptations. And identify spend to save opportunities	Martin Reid	Develop Business Case for increasing adaptations funding based on local cost benefit analysis by January 2009	 Performance measure should be identified as part of this work
Separate Housing Management and corporate procurement strategies and contracts PRIORITY = MEDIUM	<u>ی</u> و	Identify all potential repairs and maintenance areas with potential for single contract and develop forward plan	Nick Hibberd	Forward plan produced by December 2008	Number of joint contracts
Homeless cost per head PRIORITY = HIGH	GH GH	Ensure that costs and benefits of corporate commissioning of temporary contracts for social care clients are understood and identified.	Steve Bulbeck and Sylvia Peckham	Cost benefit analysis by April 2009	 Homelessness cost per head (target = reduction £)
		sts of statut from other lessness in		Separate reporting by April 2009	
		Implement Housing Need VfM review opportunities		Implement recommendations by November 2009	

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Appendix 1 – Charts and tables

Table 1: Housing CPA score (from Audit commission VfM profile)

Chart 1: Homeless applications and acceptances 2001/02-2007/08

 Table 2: Homelessness cost per head (from Audit commission VfM profiles)

Chart 2: Actual cost of homelessness/ \pounds pre head (from Acclaim benchmarking exercise)

Chart 2a Temporary Accommodation targets and projections

Table 3: Average management cost per unit (from Audit commission VfM profiles)

Chart 3: Brighton & Hove Housing management £ per property over time

Chart 4: BHCC percentage of rent collected over time

Table 5: Weekly maintenance £ per property (from Audit commission VfM profiles)

Table 1: Housing CPA score (from Audit commission VfM profile)

Authority name	2007
Blackpool Council	4
Bath And North East Somerset Council	4
Sefton Council	3
Southampton City Council	3
Brighton and Hove City Council	3
Reading Borough Council	3
Portsmouth City Council	3
Plymouth City Council	3
Trafford Metropolitan Borough Council	3
City of York Council	3
North Tyneside Council	3
Bournemouth Borough Council	2
Southend on Sea Borough Council	2
Bristol City Council	2
Coventry City Council	2
Torbay Council	2

Chart 1

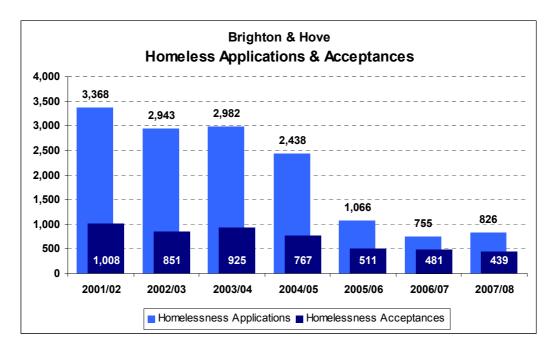


Table 2: Homelessness cost per head (from Audit commission VfM profiles)

Authority name	2007
Torbay Council	17.54
Brighton and Hove City Council	16.53
Bristol City Council	12.86
Southend on Sea Borough Council	8.56
Bournemouth Borough Council	8.34
Southampton City Council	6.54
Reading Borough Council	5.86
Bath And North East Somerset Council	5.22
Portsmouth City Council	4.10
City of York Council	4.05
Blackpool Council	4.04
Plymouth City Council	4.03
Coventry City Council	2.57
North Tyneside Council	2.28
Trafford Metropolitan Borough Council	2.08
Sefton Council	1.56

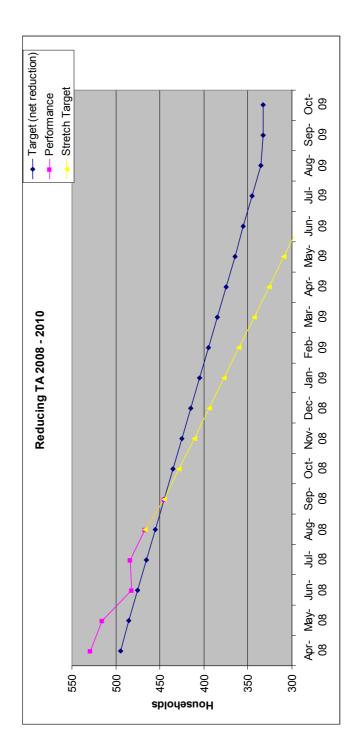
Chart 2: Actual cost of homelessness/£ pre head (from Acclaim benchmarking exercise)

Total homelssessness cost per head (adjusted population) (NB: Interim & Temporary Accommodation for Client Side only)			
up Results			
)%)			
9%)			
5%)			
%)			
(25 (79			

Appendix 1

Chart 2a Temporary Accommodation (Homeless Households) reduction target and projections 2007-8 to 2008-9

	385 375		343 326	
Mar-	385		(7)	
Feb-09	395		360	
Jan-09	405		377	
Dec-08	415		394	
Nov-08	425		411	
Oct-08	435		428	
Sep-08	445	445	445	
-	455		467	
Jul-08	465	484		
Jun-08	475	482		
May-08	485	516		
Apr-08	495	529		
	Target (net reduction)	Performance	Stretch Target	



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Table 3: Average management cost per unit (from Audit commission VfM profiles)

Authority name	2007
Southend on Sea Borough Council	29.50
Reading Borough Council	20.13
Brighton and Hove City Council	17.09
Bristol City Council	16.59
Blackpool Council	15.91
Southampton City Council	15.71
Bournemouth Borough Council	14.60
Portsmouth City Council	13.56
City of York Council	13.43
Plymouth City Council	13.39
North Tyneside Council	12.44

Chart 4

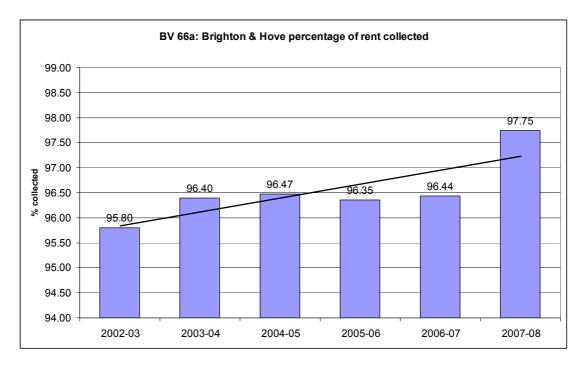


Table 5: Weekly maintenance \pounds per property (from Audit commission VfM profiles)

Authority name	2007
Portsmouth City Council	19.70
Brighton and Hove City Council	18.82
Blackpool Council	17.40
Southampton City Council	16.97
Plymouth City Council	16.74
Southend on Sea Borough Council	16.25
Reading Borough Council	16.24
Bristol City Council	15.07
North Tyneside Council	13.48
City of York Council	13.29
Bournemouth Borough Council	10.47