

# **EAST CAMBRIDGESHIRE DISTRICT COUNCIL**



## **The Private Sector Housing Renewal Policy Implementation 2022**

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## **SECTION 1 BACKGROUND**

### **1.1 Introduction**

The Private Sector Housing Renewal Policy (PSHRP) is an important part of the Environmental Services role in protecting public health.

It supports priorities identified in Cambridgeshire's Health and Wellbeing Strategy 2012-2017 which is currently under review, and at a local level the East Cambridgeshire Health and Wellbeing Strategy 2018-2021, where people's homes are recognised as one of the factors which can positively or negatively affect a person's physical and mental health and wellbeing.

[https://www.eastcambs.gov.uk/sites/default/files/agendas/rs071215\\_Q143%20Ap.pdf](https://www.eastcambs.gov.uk/sites/default/files/agendas/rs071215_Q143%20Ap.pdf)

#### **Cambridgeshire's Health and Wellbeing Strategy**

The Strategy focuses on the following six priorities to improve the physical and mental health and wellbeing of Cambridgeshire residents. In particular, within each of these priorities, it's focus is to work to improve the health of the poorest fastest. The priorities are:

1. Ensure a positive start to life for children, young people and their families.
2. Support older people to be independent, safe and well.
3. Encourage healthy lifestyles and behaviours in all actions and activities while respecting people's personal choices.
4. Create a safe environment and help to build strong communities, wellbeing and mental health.
5. Create a sustainable environment in which communities can flourish.
6. Work together effectively.

<https://cambridgeshireinsight.org.uk/wp-content/uploads/2018/01/4-HWB-Strategy-Full-Document.pdf>

(please note that an engagement exercise is being undertaken for the Cambridgeshire & Peterborough Joint Health & Wellbeing Integrated Care Strategy [Joint Health and Wellbeing Integrated Care Strategy - Cambridgeshire County Council](#))

#### **Cambridgeshire's Joint Strategic Needs Assessment (JSNA)**

The Health and Wellbeing Strategy was developed using national and local evidence of health needs as measured, analysed and reported in the Cambridgeshire Joint Strategic Needs Assessment (JSNA) and includes information about a wide range of health and wellbeing indicators.

The aim of a JSNA is to:

- Provide analyses of data to show the health and wellbeing status of local communities.
- Define where inequalities exist.
- Provide information on local community views and evidence of effectiveness of existing interventions which will help to shape future plans for services.
- Highlight key findings based on the information and evidence collected.

The summary report on all JSNA's can be found here:

<https://cambridgeshireinsight.org.uk/jsna/published-joint-strategic-needs-assessments/>

The 2013 JSNA on Housing and Health can be found here:

<https://cambridgeshireinsight.org.uk/wp-content/uploads/2017/08/Housing-and-Health-JSNA-2013.pdf>

The seven broad housing priorities for Cambridgeshire agreed by the Cambridge sub-regional housing board are to:

- Deliver new homes to support economic success.
- Enable better health and wellbeing through housing, affordable housing and housing-related support.
- Create mixed, balanced, sustainable and cohesive communities.
- Improve standards in existing homes and encourage best use of all housing stock.
- Extend housing choice and meet housing need.
- Prevent and tackle homelessness.
- Promote the benefits good partnership working can bring to housing related issues.

The PSHRP explains how East Cambridgeshire District Council will support local people and work with other agencies, both statutory and voluntary, to help with housing renewal in all its forms whether that is by mandatory and discretionary grant aid for disabled and vulnerable persons, improving standards in existing homes through encouragement and/or enforcement, or at the other end of the spectrum through encouraging and supporting the bringing of empty homes back into use.

The Env Health Team work with private landlords, tenants, RSL's and home owners on a range of housing issues, some of them statutory including:

- Works and advice to improve the condition of homes, to put right serious disrepair.
- Enforcement action if a property fails to reach a minimum

standard.

- Ensuring houses in multiple occupation (HMOs) pass standards and are licensed if necessary.
- Give advice to help bring empty homes back into use, using enforcement action against those empty for longest and which may be having a significant detrimental effect on the locality.
- Issues around hoarding behaviours and/or pest control.
- License mobile home parks.
- Make sure resources are directed to improve housing standards for the most vulnerable households.
- Support for energy efficiency improvements to address fuel poverty and cold homes.

Access to decent housing reflects affordability. Low income households and vulnerable groups are the most likely to occupy poor standard homes, often related to issues of overcrowding, fuel poverty, disrepair, damp and mould. East Cambridgeshire District Council recognises the importance of good quality housing that is affordable to its occupants. Furthermore, we recognise the role that housing plays in the wider community and the contribution it makes to people's quality of life.

As fuel prices rise more rapidly than income and benefit levels heating will become increasingly difficult to afford for some groups. The risk to vulnerable and older residents is likely to increase and measures to improve energy efficiency will be needed even more than at present to maintain health and independence at home.

East Cambridgeshire Care and Repair, Handyperson Schemes and fuel poverty and sustainable warmth initiatives are there to help support older and more vulnerable people to maintain safety and independence in their homes and to help those vulnerable residents in reducing fuel bills at a time when energy prices are increasing rapidly.

The Environmental Health Team works closely with the Housing Team to support the aim of preventing homelessness. Officers work with landlords to advise on the requirement to provide safe and statutorily compliant rented accommodation and signpost vulnerable tenants to the services offered by the council to help prevent homelessness.

The first PSHRP was adopted in 2003 in response to the introduction of the Regulatory Reform Order 2002. This order provided local authorities with general powers to provide assistance for repairs, improvements and adaptations to enable people to continue to remain in their homes.

In preparing this revised policy from the previous policy dated 2015, we have considered all current legislation relevant to the council's role in this area and have also reviewed the findings of the most recent East Cambridgeshire Housing Stock Model Report, which was published in 2021.

<https://www.eastcambs.gov.uk/sites/default/files/East%20Cambridgeshire%20Housing%20Stock%20Modelling%20Report%20FINAL%202021.pdf>

## **1.2 Legislative and Policy Background**

The Housing Act 2004 places a duty on local authorities to keep housing conditions under review. The Act introduced the Housing Health and Safety Rating System (HHSRS) risk assessment for residential properties.

The Act also introduced a mandatory duty on local authorities to licence Houses in Multiple Occupation in certain circumstances.

The Housing and Planning Act 2016 introduced an additional package of measures to help tackle rogue landlords in the private rented sector.

In 2020 the Electrical Safety Standards in the Private Rented Sector Regulations came into force and since April 2020 the Minimum Energy Efficiency Standards Regulations have applied to all domestic rented properties, subject to exemptions.

Local authorities are encouraged to work closely with landlords in the private rented sector but also to make full use of their enforcement powers for tackling dangerous and poorly maintained dwellings.

The Regulatory Reform Order 2002 repealed much of the Housing Renovation Grants regime of the previous Housing Grants, Construction and Regeneration Act of 1996 but left in place the Mandatory Disabled Facility Grants and discretionary grant duties.

In addition, the Home Energy Conservation Act 1995 continues to place a requirement on the authority to have a strategy for promotion and adoption of energy efficiency measures and to work towards the reduction of fossil fuel use.

Within the Council's Environment and Climate Change Action Plan one of the 20 Commitments for 2022/23 is to help improve the energy efficiency of existing housing stock in the district, in particular through:

- successfully implementing around £1.75m in home energy efficiency improvements, funding which has been awarded from the LAD3/HUG national funding stream;
- in partnership with Cambridgeshire Energy Retrofit Partnership (CERP), establish a framework of contractors that can undertake grant-funded and privately-funded retrofit schemes;

- establish with CERP a suite of communications (including a bespoke website) to assist residents in understanding the retrofit options available and access to potential contractors; and
- undertake further research to understand more fully from an East Cambridgeshire perspective the options and cost implications of achieving Government targets for 2035 and 2050 in relation to reducing carbon emissions from domestic dwellings.

The Government released its White Paper on Levelling Up in February 2022 with measures identified that will help support better housing standards, and in the private rented sector these measures include:

1. A commitment to consult on introducing a landlords register, and set out plans for a crackdown on rogue landlords
2. All homes in the private rented sector will have to meet a Decent Homes Standard, which currently only applies to the social rented sector
3. Re-confirming that Section 21 “no fault” eviction will be abolished which will stop renters being kicked out of their homes for no reason
4. Commitment to the new Social Housing Regulation Bill which will deliver upon the commitments that the government made following the Grenfell tragedy

Although at an early stage in the process and details must be agreed, East Cambridgeshire District Council welcomes the proposals and supports all future measures introduced that will address poor quality housing and which will help to improve the health and wellbeing of residents.

### **1.3 The Condition of the Local Housing Stock**

In 2021 the Building Research Establishment (BRE) was commissioned to undertake a series of modelling exercises on East Cambridgeshire District's Housing Stock. This was in place of a full Housing Stock Condition Survey. Commissioning the Housing Model rather than the Survey is a more cost-effective option whilst still complying with the Council's legal requirements to regularly review its private sector housing stock. The information provided has informed this policy and will facilitate a more targeted intervention approach to improve housing

The headline findings are as follows:

- i) There are 37,556 dwellings in East Cambridgeshire. 72% are owner occupied, 15% private rented and 13% social rented.
- ii) 5,338 dwellings in the private sector have category 1 Housing Health and Safety Rating System (HHSRS) hazards. This equates to 16% of properties.
- iii) 951 dwellings in the private rented sector have category 1



HHSRS hazards. This equates to 17% of properties in the private rented sector.

- iv) The highest concentrations of all HHSRS hazards in the private sector are found in the wards of Downham, Haddenham and Woodditton.
- v) The highest concentrations of fuel poverty (Low Income High Costs definition) in the private sector are found in the wards of Woodditton, Haddenham and Downham; and for excess cold the highest concentrations are in Downham, Haddenham and Woodditton.
- vi) The average Simple SAP rating for all private sector dwellings in East Cambridgeshire is 58, which is worse than both England (60) and East of England (60). For owner occupied stock the figure is 57 and for private rented stock it is 61.
- vii) The total cost of mitigating category 1 hazards in East Cambridgeshire's private sector stock is estimated to be £20 million – with £16.5 million in the owner-occupied sector, and £3.6 million in the private rented sector.
- viii) 10.7% (3,487) of private sector dwellings, and 8.6% (472) of private rented dwellings in East Cambridgeshire are estimated to have an EPC rating (based on Simple SAP) below band E.
- ix) In the private sector stock, there are an estimated 4,680 dwellings with un-insulated cavity walls, and 3,251 dwellings with less than 100mm of loft insulation.
- x) Analysis of the energy efficiency variables indicates that the owner- occupied stock has the highest average figures for the majority of variables (Simple CO2, energy and heat demand).

### **1.3.1 House Conditions**

#### **(i) Housing Health and Safety Rating System (HHSRS)**

The HHSRS is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to the health and safety of occupiers and visitors to a home. It assesses 29 categories of hazard and each hazard has a rating which helps determine whether the property is rated as having a Category 1 hazard (the most serious) and which requires formal action by the Council.

In the modelling results for all stock (private and social) the performance of the housing stock in East Cambridgeshire compared to the English House Condition England is mixed. East Cambridgeshire performs slightly worse for all hazards (15% compared to 12%) and fall hazards (8% compared to 7%) and notably worse for excess cold (15% compared to 12%). ECDC does better for disrepair (2% compared to 4%), fuel poverty and low-income households (19% compared to 26%).

When comparing East Cambridgeshire with the East of England region the picture is similar.

When looking at the private stock alone (discounting the social housing stock which is generally better than the private sector stock across the majority of variables) the private rented stock, in comparison to the owner-occupied stock, has slightly higher levels of all hazards, fall hazards, disrepair and fuel poverty. The owner occupied has the highest levels of excess cold at 8% and also has the poorest SimpleSAP rating at 57.

The data allows us to identify hazards which are most likely to occur and also those areas of the District where the higher concentrations of hazards occur, in addition to identifying the differences seen between tenures. This can help to target those areas where proactive work in raising understanding of the risks of hazards in the home can focus, thereby tackling potential poorer housing in the areas in which it is more likely to occur and on a more risk-based approach.

For example, the HHSRS Category 1 hazards map in the survey shows there are higher concentrations overall in Downham, Haddenham and Woodditton. Looking at tenure it can be seen that in Woodditton 24% and 18% of the owner-occupied stock is modelled as having a Category 1 hazards for all hazards and excess cold respectively, whereas the private rented stock shows 29% and 21% respectively.

(ii) Disrepair

The disrepair variable used in the modelling report was based on the disrepair component of the Decent Homes Standard.

<https://www.gov.uk/government/publications/a-decent-home-definition-and-guidance>

A dwelling fails the disrepair component if:

- 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.

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

- External walls
- Roof structure
- Windows/doors
- Chimneys
- Central heating boilers
- Electrics

Other building components are those which have a less immediate impact on the integrity of the dwelling. Their combined effect is therefore considered for example a kitchen and a bathroom in old and irreparable condition.

The housing model shows there are pockets of higher levels of disrepair distributed across the area, with the wards of Burwell, Downham and Fordham and Isleham showing the highest levels.

(iii) Energy Efficiency

Understanding the energy efficiency of the housing stock was an important aspect of the housing model report and a key element relating to energy efficiency is households in fuel poverty. A household is said to be in fuel poverty if they have required fuel costs that are above the average and were they to spend that amount, they would be left with a residual amount that leaves them below the official poverty line. Based on the low-income high costs' variable, areas of the District can be identified as having higher concentrations of fuel poverty than others.

When considering the amount of money, a household would require to remove them from fuel poverty (termed the fuel poverty gap and which is a measure that is more responsive to changes in energy prices and the economy) then under prices relevant to 2021 the estimated aggregated fuel poverty gap for fuel poor households in the private sector in East Cambridgeshire is £1.32 million of which £0.32 million is from the private rented sector.

The housing model allows us to identify where low-income households and therefore potentially vulnerable people are likely to be living in poor housing with an excess cold hazard. There are pockets distributed across the district but with an area to the west of Haddenham standing out.

### **1.3.2 Overall Conclusions from Survey**

The cost of making the necessary improvements to dwelling conditions, including repairs along with improvements to energy efficiency is high.

A wide range of measures needs to be provided to assist and support residents to improve and maintain their homes.

It is essential for the Council to continue to support the most vulnerable people struggling to maintain their houses to enable them to remain living in their own home.

To achieve this, the Council should continue to develop and maintain partnerships with other organisations to support the above and improve energy efficiency measures.

The government recommendation is that a housing stock survey should be undertaken every five years to provide evidence to support the development of an appropriate housing strategy.

## **SECTION 2 HOUSING IN CONTEXT**

### **2.1 Health and Financial Implications of Poor Housing**

It has long been recognised that poor housing has adverse effects on health and leads to demands on other budgets in other areas of the public sector, for example the National Health Service (NHS).

**Table 1: Causes of deaths and injuries in the UK (WHO Europe 2005)**

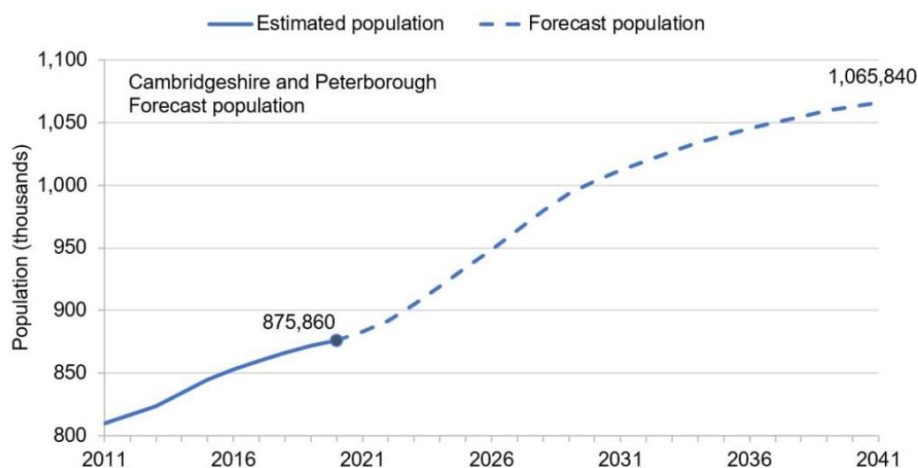
| <b>Per Year</b> | <b>Killed Persons</b> | <b>Injured Persons</b> |
|-----------------|-----------------------|------------------------|
| At work         | 380                   | 1,500,000              |
| On the road     | 3,600                 | 317,000                |
| In the home     | 4,100                 | 2,700,000              |

The above table highlights the importance of housing and the need to ensure adequate resources are allocated to address improvements needed and reduce the impacts of poor housing.

**Table 2:** Typical health outcomes and first year treatment cost for selected HHSRS hazards (CIEH 2013)

| Hazard                     | Class 1                             | Class 2                           | Class 3                       | Class 4                        |
|----------------------------|-------------------------------------|-----------------------------------|-------------------------------|--------------------------------|
| Damp and mould             | Not applicable                      | Type 1 allergy (£1,998)           | Severe asthma (£1,120)        | Mild asthma (£180)             |
| Excess cold                | Heart attack, care, death (£19,851) | Heart attack, (£22,295)           | Respiratory condition (£519)  | Mild pneumonia (£84)           |
| Radon (radiation)          | Lung cancer then death (£13,247)    | Lung cancer survival (£13,247)    | Not applicable                | Not applicable                 |
| Falls on the level         | Quadriplegic (£59,246)              | Femur fracture (£25,424)          | Wrist fracture (£745)         | Treated cut or bruise (£67)    |
| Falls on stairs and steps  | Quadriplegic (£59,246)              | Femur fracture (£25,424)          | Wrist fracture (£745)         | Treated cut or bruise (£67)    |
| Falls between levels       | Quadriplegic (£59,246)              | Head injury (£6,464)              | Serious hand wound (£1,693)   | Treated cut or bruise (£67)    |
| Fire                       | Burn, smoke, care, death (£11,754)  | Burn, smoke, care, death (£7,878) | Serious burn to hand (£2,188) | Burn to hand (£107)            |
| Hot surfaces and materials | Not applicable                      | Serious burns (£4,652)            | Minor burn (£1,234)           | Treated very minor burn (£107) |
| Collision and entrapment   | Not applicable                      | Punctured lung (£3,439)           | Loss of finger (£1,536)       | Treated cut or bruise (£67)    |

Cambridgeshire is forecast to experience significant growth over the coming years.



East Cambridgeshire has an ageing population and if forecast assumptions hold, by 2041 the proportion of the population of East Cambridgeshire aged 65+ may see an increase of 58.8% compared to an increase in population of those under 65 of 13.7%. Data obtained from Cambridgeshire Insight Local Population and Dwelling Stock Estimates and Forecasts 2020:

<https://cambridgeshireinsight.org.uk/population/population-forecasts/>

### **SECTION 3 THE COUNCILS ROLE IN PRIVATE SECTOR HOUSING**

The Council is committed to improving conditions across all tenures, including privately rented and owner-occupied houses. It is primarily an owner's responsibility to maintain their own home but the Council acknowledges that some homeowners, particularly the elderly and vulnerable do not have access to resources to keep their homes in good repair.

The result of poor-quality housing has an adverse impact on the health and safety of occupiers that in turn impacts upon other services provided throughout the district.

By improving housing conditions, contributions are made to broader policies such as health, regeneration, energy efficiency and environmental sustainability.

The Council has a number of legal duties as identified earlier in this policy in relation to private sector housing stock which it must undertake.

These may be summarised as follows:

1. Production and implementation of a Housing Renewal Policy.
2. Housing inspections using the HHSRS to address serious disrepair.
3. Fund and administer the provision of a Housing Adaptations and Repairs Policy.
4. Advice and support for energy efficiency improvements.

5. Operation of a licensing scheme for Houses in Multiple Occupation.
6. Issue site licences for mobile home parks and undertake annual inspections of the larger parks.
7. Action against properties that are considered long term empty and which may be having a significant detrimental effect on the locality.
8. The tackling of hoarding and/or pest control complaints.
9. Assessment of housing needs for Gypsy and Traveller Communities.
10. Production and implementation of a Homelessness Strategy

### **3.1 Housing Renewal Policy**

Key strategic objectives of this policy are to:

- Enable the elderly, vulnerable and disabled people to live in comfort and security in their homes.
- Increase the proportion of private sector housing that is of a decent standard, with a focus on those that are occupied by vulnerable households.
- To reduce fuel poverty.
- To support initiatives to bring long term empty homes back into use.
- To provide accessible information to the public to enable them to obtain assistance and advice on all matters around housing disrepair and energy efficiency.

### **3.2 Housing inspections**

Officers respond to all complaints received about property condition, whether that is from a tenant (social and private) with outstanding repairs, when concerns are raised about a property being used as an HMO, or when a neighbour is concerned about the condition of a property, its garden or the presence of vermin.

Officers will undertake inspections when required and will initially work with the owner or occupier if matters can be resolved informally. We will signpost residents to other forms of assistance when applicable, for example the Safe and Well service provided by the Fire Authority or Care and Repair if considered eligible for grant assistance etc. However formal enforcement action will be taken if issues cannot be resolved on this basis and there has been a clear and serious disregard for the safety of the tenants. Formal action against an owner occupier will only be taken as a last resort.

The Private Sector Housing Enforcement Policy 2022 identifies the actions Environmental Health will take in addressing poor quality rented accommodation. [Link to be added when approved policy on website](#)

### **3.3 Housing Adaptations and Repairs Grant Assistance**

The East Cambridgeshire Housing Adaptations and Repairs Policy 2019 stemmed from a county-wide review of Disabled Facilities Grants carried out during 2016-17, and the need for housing, health and social care services to work in a more joined up way.

<https://www.eastcambs.gov.uk/sites/default/files/Housing%20Adaptations%20Policy%202020.pdf>

Key principles for how the district councils' Disabled Facilities Grant Allocation could be better used to support wider health and social care outcomes formed part of a Cambridgeshire Housing Adaptations Agreement which was developed, following the review, between the district and county councils in partnership with the Cambridgeshire & Peterborough Clinical Commissioning Group.

The Policy incorporates some of these key principles and contributes to the Cambridgeshire Better Care Fund Plan vision, which involves diverting resources away from acute health services and ongoing social care, focusing on helping people to help themselves, and returning people to independence wherever possible.

It also helps to support some of the priorities identified in a number of key local strategies, including: Cambridgeshire's Health and Wellbeing Strategy, Older People's Accommodation Strategy; an Ageing Well Strategy; and the district councils' own Housing Strategies. There are also links with the Cambridgeshire Housing and Health Joint Strategic Needs Assessment.

The Policy also helps to meet each of the five district councils' wider responsibilities around tackling hazards in the home, and will form part or all of each council's Regulatory Reform Order Repair & Renewal policies. Housing adaptations represent just one of a range of other interventions helping people to remain living at home. These include reablement services, provision of assistive technology and other daily living equipment, and Cambridgeshire Handyperson Service, to name a few.

One of the findings of the Review was that in order to achieve better outcomes for people, and to make best use of the resources available, providing repairs and adaptations in the home in which someone is currently living will not always be the best solution

With limited funding available, for the Policy to be successful it will need to be implemented hand in hand with a new approach to considering people's wider housing options. Independent advice and information on alternative housing options – for example sheltered or extra care housing or moving to a more suitable home – will, where appropriate, be made available at an early stage.



This is particularly important where someone's home is unlikely to remain suitable in the longer term.

An ageing population will increase the demand for all assistance but when considering the demand on grant assistance for those disabled or more vulnerable this may be particularly challenging, especially when combined with increases in the requirement for adaptations in complex children's cases and with increased build costs generally.

**Table 3:** East Cambridgeshire Capital budget provision for grants to support the elderly or vulnerable

|                             | <b>2020/21</b>  | <b>2021/22</b>  | <b>2022/23</b>  |
|-----------------------------|-----------------|-----------------|-----------------|
| <b>Mandatory DFG</b>        | <b>£697,299</b> | <b>£697,299</b> | <b>£697,299</b> |
| <b>Discretionary Grants</b> | <b>£75,000</b>  | <b>£75,000</b>  | <b>£75,000</b>  |

### **3.4 Energy Efficiency**

ECDC works in partnership with 4 other District Councils and Cambridgeshire County Council as the Cambridgeshire Energy Retrofit Partnership (CERP) to play our part in helping meet national & international carbon reduction goals through retrofitting the county's domestic buildings. We use the branding Action on Energy.

The Council is supporting residents who are Able To Pay for energy improvement measures to access clear guidance and support whilst continuing to bid and administer, Government Grant Funding to improve energy efficiency for Low Income High Cost (fuel) households.

The CERP has recently successfully bid for 2 rounds of Government Grant Funding and plan to continue to bid for additional funding as it becomes available.

ECDC were awarded:

- £670,000 to support planned upgrades to Social Housing & Private Homes (Scheme closes July 22)
- £1.775,000 to provide improvements to private housing (owned or rented) (Sustainable Warmth Scheme ends March 23)

Individual grants for Sustainable Warmth scheme can be up to £25,000 (depending on the energy inefficiency of a home and whether it is on or off the gas grid).

This work links extremely well with the Cambridgeshire and Peterborough Climate Action Plan recently published by the Cambridgeshire and Peterborough Independent Commission on Climate Change, on behalf of the Cambridgeshire and Peterborough Combined Authority (CPCA). The report makes 58 recommendations to set the area on a pathway to net zero emissions and to prepare for climate change impacts and the joint procurement exercise currently being undertaken is seen as an example of good practice.

### **3.5 Houses in Multiple Occupation (HMO)**

There are 25 HMO's currently licensed or waiting for a licence within the District. These are properties where there are 5 or more people, from 2 or more households, with some shared facilities. All licensed HMO's are inspected at application stage to ensure compliance with all standards required within such higher risk properties. The Domestic Team work closely with the Fire Authority on premises which are considered higher risk from fire due to their size or construction.

Estimates of the number of HMO's that do not require a licence, as they are occupied by less than 5 persons, currently stands at 220. Inspections of such premises are only undertaken if a complaint is received, as there is no requirement on landlords to register with the local authority that they are operating a smaller HMO. Such premises must still comply with the Housing Act 2004, the HMO Regulations and other supporting legislation and the challenge arises in locating these premises. In addition, properties will change ownership over time or be reverted back to single occupancy. Local knowledge and close links with other Departments such as the Housing Team help in officers understanding of where such properties may be located.

### **3.6 Mobile Home Parks**

Mobile Home Parks provide much needed and more affordable accommodation within the District. There are currently 15 licenced caravan sites within the District, 10 of which are classed as relevant protected sites which are the larger sites with year-round occupation by residents.

Officers inspect all larger sites on an annual basis to check compliance with licensing conditions, making recommendations for site safety improvements when required.

### 3.7 Empty Homes

At a time of housing shortages empty homes are a wasted resource and can have a blight on the neighbourhood in which they are situated.

Statistics obtained from Anglia Revenue Partnerships (ARP) allows a comparison in the percentage of empty homes from neighbouring Districts and the changes that have occurred over the last few years.

|              | Total number of dwellings | Total number of Empty Homes – April 2022 and % of total | Change in number of empty properties between April 2016 and April 2022 |
|--------------|---------------------------|---------------------------------------------------------|------------------------------------------------------------------------|
| Breckland    | 63,436                    | 577 (0.9%)                                              | -52                                                                    |
| East Suffolk | 120,299                   | 1,376 (1.1%)                                            | -12                                                                    |
| Fenland      | 46,688                    | 526 (1.1%)                                              | +44                                                                    |
| West Suffolk | 82,133                    | 860 (1.04%)                                             | +131                                                                   |
| East Cambs   | 39,365                    | 601 (1.5%)                                              | +283                                                                   |

There are a number of issues with accurately identifying private sector vacant dwellings including the transient nature of vacant dwellings and the difficulties in identification. Properties are continually bought and sold, modernised and let, which means at any given time there will be naturally vacant properties in the district. The ones of most interest are those that are long term empty. Local authorities have a range of powers and incentives at their disposal to help bring empty homes back into use. These include compulsory purchase, empty dwelling management orders, council tax premiums or requiring the securing of vacant properties subject to, or at risk from antisocial behaviour.

### 3.8 Hoarding and other public health issues

Complaints or concerns are often raised about the condition of homes and/or gardens from a range of sources, for example from a neighbour or via a supported living representative who visits someone in their own home. These can sometimes include concerns about vermin.

Officers have a range of powers to investigate such issues, and will work with the occupier in the first instance to support and assist in addressing matters of a public health or housing concern, including partner agencies from both statutory and voluntary sectors to provide all the support options that may be available.

Enforcement action is taken when applicable, although in situations where an individual is exhibiting hoarding behaviours this is not usually considered an appropriate response.

The local authority is part of the Cambridgeshire Hoarding Forum. This is a forum for professionals who may come across and be required to support people who hoard, to come together and seek advice, best practice and guidance from others. It is a multidisciplinary forum that allows for a wide range of knowledge and experience to be shared, that ultimately helps to address the challenges that such situations pose.

## **SECTION 4 CURRENT INITIATIVES AND FUTURE CHALLENGES**

### **4.1 Energy Efficiency**

The Housing Model data has been used to identify 3 separate specific wards within the district, that may have larger numbers of eligible households experiencing an excess cold hazard and/or a higher fuel poverty gap. Woodditton was one of the wards identified and approximately 800 letters have been sent out to residents in this ward advising them that based on local information available, their property may be not be as energy efficient as it could be.

The offer is of full funding to eligible home owners to install measures such as loft, cavity, room in roof and external wall insulation and some clean heating and energy producing solutions such as Air Source Heat Pumps and Solar PV.

Depending on the success of this promotion, and the accuracy of the Model data, a similar exercise will be undertaken in the other areas of the District that have been identified as having a potentially higher concentration of cold homes and which are occupied by eligible homeowners.

The wide range of assistance available to help people to maintain warm and healthy homes will continue to be communicated widely, to reach as many people as possible, but in particular those most vulnerable.

## **4.2 Housing Adaptations and Repairs**

The wide range of assistance available to help disabled and vulnerable people to remain safe and warm in their own homes will continue to be communicated widely, to reach as many people as possible, but in particular those most vulnerable.

The provision of independent advice and assistance to help residents obtain the financial benefits to which they may be entitled will continue.

The provision of independent advice and assistance to help residents to consider the best housing option for them, will remain a focus.

## **4.3 Housing Disrepair**

Officers will continue to respond in a timely way, to all complaints about housing conditions, undertaking inspections as required and fully incorporating the guidance contained within the updated Private Sector Housing Enforcement Policy 2022, in any decisions made with respect to formal enforcement.

The Housing Stock Model data will continue to be interrogated to help identify those most likely to be in need and those areas where targeted promotions around housing disrepair and minimum energy efficiency standard requirements are likely to have the greatest impact. Such promotions could be undertaken using existing partner agencies, local community groups and other local resources, as well as using the option of mailshots, to help inform private rented occupiers of their rights and the assistance the council can provide.

Strong links will be maintained with other Council Departments and partner organisations who provide support to people in their own homes, to ensure that any concerns about housing conditions are directed at the earliest instance to the Domestic Team in Environmental Health.

Information about other support mechanisms and guidance that is available to residents will continue to be communicated when visiting people in their own homes, for example the Homelessness Prevention Service at the Council.

The Council website information will be regularly reviewed and updated to help landlords clearly understand their responsibilities with respect to housing conditions.

The Council website information will be regularly reviewed and updated to help tenants who may have concerns about property conditions, to understand the standards that rented properties are required to meet,

and how to seek help from the Council if such standards are not being met.

#### **4.4 Empty Properties**

The Domestic Team will investigate the range of options available to further encourage the bringing back into use of long-term empty properties within the District.

In comparison to some of our neighbouring districts East Cambridgeshire charges an additional empty property premium on its council tax charges of 50% after a property has been empty for longer than 2 years. Breckland, East Suffolk, West Suffolk and Fenland charge an additional premium of 100% on properties empty for greater than 2 years and this rises to a 200% premium for those empty for between 5 and 10 years and a 300% premium is charged for those empty for over 10 years.

Although this may not be the only factor in the higher rate of empty properties currently seen in East Cambridgeshire such financial penalties are likely to help encourage owners to sell or renovate empty properties and so this avenue will be explored in conjunction with ARP and the relevant council departments.

The Domestic Team will also be undertaking a fact-finding project, investigating schemes set up in other Districts, to understand the resource implications and the success of initiatives that have been developed to tackle the issue of long-term empty homes.

The Domestic Team will investigate the options available to the local authority should an Empty Dwelling Management Order be required, to understand the resource implications and the risk to the Council of either the Council taking over the management of a property or using a third party to take over the management of an empty property.

The Domestic Team will continue to monitor Empty Property numbers and will investigate complaints of empty properties, using advice and encouragement to help bring them back into use. Enforcement options will be fully considered, taking in to account the resources available and the circumstances of the case.

#### **4.5 HMO's**

Officers will continue to respond in a timely way, to all complaints about housing conditions in HMO's or complaints about potential unlicensed HMO's, undertaking inspections as required and fully incorporating the guidance contained within the updated Private Sector Housing Enforcement Policy 2022, in any decisions made with respect to formal enforcement.

Strong links will be maintained with other Council Departments and partner organisations who may become aware of unlicensed HMO's or HMO's that have unsafe conditions, to ensure that any concerns about housing conditions are directed at the earliest instance to the Domestic Team in Environmental Health.

The Domestic Team will continue to work in conjunction with the Housing Team to provide advice and guidance to prospective landlords of HMO's, on meeting the required standards for safe accommodation.

Information on unlicensed HMO's or those smaller shared houses can be difficult to obtain. Sources of data that may indicate a shared house are wide ranging and not easily accessible, for example actively searching rooms to rent websites and making enquiries as to availability would require a Covert Human Intelligence Source authority to be provided. Some data may be available from Anglian Revenues Partnership. Proactive searching for such properties is resource intensive. The Domestic Team will continue to maintain its own database of prospective HMO properties through its own intelligence gathering, and will continually review the resources available to undertake the proactive work required in this area.

The Domestic Team supports the Government proposals to develop a national landlord register and work may be required in this area going forward. Officers will monitor the implications of such a scheme and develop appropriate strategies should legislation be adopted.

#### **4.6 Other forms of assistance**

The Council will continue to work with the local landlord and managing agents' communities via landlord forums and other information sharing initiatives and/or publicity, to broaden the amount of information made available to these businesses and individuals around private sector housing conditions.

An example being that in August 2022 the Domestic Team contacted over 90 landlords and managing agents within East Cambs, to inform them of the open invitation to a landlord forum being run by the National Regional Landlord Forum and Cambridge City Council in September 2022. Topics of discussion included the highly relevant Government plans to introduce a legally binding Decent Homes Standard (DHS) in the private rented sector and the standards this may require for landlords/property managers to achieve.

## **SECTION 5 - ACCESS TO THE SERVICE**

### **5.1 Equality, diversity and inclusion**

The Council recognises and values the diversity of all people and communities in the district and in our workforce, and is committed to providing efficient, effective and relevant services to our residents and to ensuring that we are a good employer.

The policy can be accessed here <https://www.eastcambs.gov.uk/east-cambs-district-council/single-equality-scheme> or by telephone call, or personal, written or electronic inquiry.

A translation service is available at the District Council offices for non-English speaking inquiries. In addition, this document can be made available in large print or on audiotape if required. Please contact Customer Services on 01353 665555.

### **5.2 Sources of advice**

East Cambridgeshire District Council, through the Environmental Services Domestic Team, the Energy Efficiency Team and Care and Repair Services, provides information and technical advice for a range of housing functions, ranging from Housing Conditions (for all tenures and for houseboats and mobile homes), Houses in Multiple Occupation, Empty Properties and Energy Efficiency through to Disabled Facilities Adaptation options and access to grants and other forms of financial assistance. They can be contacted on 01353 665555. If your enquiry is relevant to repairs and adaptations for vulnerable persons then please contact Care and Repair Services on 01353 616950.

The Community and Housing Advice Team at the District Council provides free and confidential advice on housing rights and options, benefits, homelessness, harassment and can assist you in finding accommodation. They can be contacted on 01353 665555.



For any of the above services you can call into the Council offices during normal office hours. The full address and office hours are shown in Appendix A.

### **5.3 Complaints and Feedback**

East Cambridgeshire District Council is committed to providing a high standard of customer care, and aims to follow the published Customer Care Code at all times. This Council also has a complaints policy and welcomes comments and ideas on how individuals think the services can be improved. Details of how to do this are below.

Our Customer Care Standards can be found at:

<https://www.eastcambs.gov.uk/content/customer-charter-service-standards>

<https://www.eastcambs.gov.uk/customer-services/customer-feedback-complaints>

or these can be provided to you by contacting 01353 665555

## APPENDIX A

### Contact details

**Domestic Team,  
Environmental Services,  
East Cambridgeshire District Council  
The Grange,  
Nutholt Lane,  
Ely,  
Cambs  
CB7 4PL**

Tel: 01353 665555  
e-mail: [DomesticTeamEH@eastcambs.gov.uk](mailto:DomesticTeamEH@eastcambs.gov.uk)

Office hours: Monday – Thurs 8:45am – 5:00pm  
Friday 8:45am – 4:30pm

**East Cambridgeshire Care and Repair Services  
East Cambridgeshire District Council  
The Grange,  
Nutholt Lane,  
Ely,  
Cambs  
CB7 4PL**

Tel: 01353 665555 or 616950  
e-mail: [careandrepairservices@eastcambs.gov.uk](mailto:careandrepairservices@eastcambs.gov.uk)

Office hours: Monday – Thurs 8:45am – 5:00pm  
Friday 8:45am – 4:30pm

**Housing Advice  
East Cambridgeshire District Council  
The Grange,  
Nutholt Lane,  
Ely,  
Cambs  
CB7 4PL**

Tel: 01353 665555  
e-mail: [communityadvice@eastcambs.gov.uk](mailto:communityadvice@eastcambs.gov.uk)

Office hours: Monday – Thurs 8:45am – 5:00pm  
Friday 8:45am – 4:30pm