

# Public Document Pack



**TRAFFORD**  
**COUNCIL**

## **QUESTIONS FOR COUNCIL**

Date: Wednesday, 20 March 2024

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This is an opportunity for Members of Council to ask the Mayor, Members of the Executive or the Chairs of any Committee or Sub-Committee a question on notice under Procedure Rule 10.2.

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## Questions Submitted for Council – 20 March 2024

### **Question 1 - Submitted by Cllr Zhi**

Online, on change.org, there is an internet-based petition titled 'Improve the Safety and Quality of Crossing between Altrincham Girls Grammar School Sites' started by students of Altrincham Grammar School For Girls. This petition wants a better and safer crossing between the main school and the sixth form sites, as at present the current crossing is comprised of planks of wood across a very muddy sodden pathway. Altrincham Grammar School for Girls want a safe crossing that is well-maintained by the relevant authorities.

Can the Council inform me what the Council would like to do in order to solve this issue?

Response:

There are links and pathways between the Altrincham Grammar School for girls and sixth form sites that are unfortunately not adopted and pass through areas of land that is not in the councils ownership. Therefore there are limits to what the council can actually do to improve these paths. The damage to the adjacent greenspaces to this unadopted path has occurred due to the increase in footfall that has resulted following recent expansion of the school sites; the Council will work with the school to look at a solution to approve the widening of the path into the councils green space and elsewhere. However, this will also need permission of the owner of the paths.

### **Question 2 - Submitted by Cllr Zhi**

Under the Environmental Protection Act 1990, National Highways, formerly Highways England, is responsible for collecting litter on England's motorways. I have had multiple complaints from residents regarding the quantity of rubbish visible at the motorway entry-points in Trafford. Has Trafford Council written to National Highways to enquire about the accumulation of rubbish at the various motorway entry-points in Trafford?

Response:

The litter that accumulates on the slip lanes to and from junctions on the motorways that are within Trafford are the responsibility of National Highways and we do forward our concerns to them with regard to the accumulations of litter that do impact on our environment. If the public and members want to report issues they can also go online and report the issue direct via their website [National Highways Report a problem](#)

### **Question 3 - Submitted by Cllr Duncan**

Over 12 months ago, on the 25<sup>th</sup> January 2023, in this chamber, I highlighted the urgency to address damp and mould problems for our residents throughout Trafford, more specifically the ward I represent – Manor Ward. Duly, in your formal written reply, I received a barrage of mathematical percentages as to 'what this council is doing' to address this issue.

In the same response, and in order to address my serious concern within Trafford social housing stock, it was confirmed: 'We do not yet have full figures from May 2022 to 25<sup>th</sup> January 2023 but I can advise that since we changed our processes in November we have dealt with 30 damp and mould complaints across the Borough'. Do you now have these figures?

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The Secretary of State also asked for a full response by the 27<sup>th</sup> January 2023. The Leader of the Council, Councillor Tom Ross advised: 'he would check whether it could be published'. Can I enquire if this response was sent to the Secretary of State, and if so, can we see a copy of the letter?

Response:

The Council has a dedicated webpage for damp and mould which contains helpful information and advice [Damp and mould \(trafford.gov.uk\)](https://trafford.gov.uk)

Prior to November 2022 the Housing Standards Team did not have a specific code to record damp and mould complaints. Since the introduction of this new coding, the team have received 126 damp and mould complaints across the housing stock as a whole. We do not routinely record the specific tenures of the homes involved as our focus is to tackle the problems identified, however it is estimated that social housing properties account for less than 5% of all complaints.

Social housing tenants are advised to contact their housing provider to use their complaints process and if that is exhausted, make a complaint to the social housing ombudsman. The Council would then intervene if the situation is not resolved. This course of action is used to focus the limited resource we have to tenants of private rented properties, who don't have the same options for recourse as social tenants. The exception to this is if the social housing tenants are vulnerable and deemed unable to progress through the complaint's procedure or the damp and mould is assessed as severe, the Housing Standards Officers will prioritise these cases to intervene and assist.

Attached (at the end of the document) is the full response sent to the Secretary of State in January 2023 – this was submitted as an online form, as required by DLUHC.

### **Question 4 - Submitted by Councillor Frass**

At the Executive Meeting on 26th February 2024, plans were approved to accept a National Lottery Heritage Fund grant subject to conditions requiring shortfall in match funding to be made up by taking money away from approved schemes.

How can the Administration justify taking more and more money away from parks in South Trafford to plough into a park at the other end of the Borough?

Response:

The Longford Park project provides a unique opportunity to improve facilities within one of the oldest and most historic parks in the Borough. The original home of John Rylands, the Park has a long legacy of social improvement and community involvement. By upgrading many features within the park, we can help sustain its future for decades to come. At a time when more development is being directed to locations within our urban areas such as the nearby Civic Quarter, it is right that we invest in providing sustainable greenspace for existing and future residents to enjoy. For that reason it is wholly appropriate that the Council is committed to securing the benefits brought by the Longford Park initiative.

In the meantime we will not be neglecting parks elsewhere. Parks across the borough have received an annual capital investment of circa £250k p.a. for the previous 5 years and will continue at similar levels over the next couple of years as part of the MTFP. The budget will be supplemented using other grant funding and developer contributions that become available and will contribute towards improvements in infrastructure including play equipment, pathways and drainage across all the parks in the borough. The NLHF funding was a site specific bid for funds with a specific funding strategy to meet any match funding requirement over the next few years.

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### **Question 5 - Submitted by Councillor M. Taylor**

I would like to submit a question to Council about the state of Halecroft Park, which is within my ward.

I would like to know:

- When will the broken railings along the entrance of Halecroft Park will be repaired, as they are a health and safety issue and an eyesore.
- When will the pond will be drained and filled in as it is not fit for purpose. Indeed, the Friends of Halecroft Park are still waiting for it to be filled in due to how unsafe it is.
- When will the wildflower meadow start to be properly maintained as it looks a mess and hasn't been cut.
- What are the plans for the pavilion as currently it is not being utilised and as such is a wasted opportunity.
- What disabled access is being implemented to make the Park more accommodating for those with disabilities as some areas are currently inaccessible.

Response:

The issue of railings and the filling in of the pond are scheduled to be undertaken early in the new financial year. Together with maintenance of the wildflower meadow and parks activities these items are discussed with Friends of Halecroft Park during the regular walkabouts that take place. With reference to the pavilion this will require investment and a business case to justify any future use / re-opening. Disabled access to all our parks is being assessed on an ongoing basis and will form part of the 25/26 capital bid for parks.

### **Question 6 - Submitted by Councillor Evans**

It is acknowledged that secondary school places in the south of the borough are in the red zone of Trafford's Rag Reports. Should a selective school approach the council requesting to expand to accommodate the demand in their locality would the school be allowed to access this £43.08m available in the Capital Budget?

Response:

There are corrections to the question. At last night's All-Party Accounts and Audit Committee the secondary school places RAG rating was downgraded to Amber, as the Committee acknowledged the tremendous efforts that the school teams are undertaking to provide more places in the south of the borough, including the proposal to increase the PAN at Altrincham College by another 300 by 2025 – another 2 forms in every year group.

There is also not £43.08m available to spend. The unallocated balance of the Council's basic need grant allocation for 2025/26 is £9.315 million, as per the Education and Early Years Basic Need and High Needs Capital Report which went to Executive on 29 January 2024.

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Since 2015, around one third of pupils who achieve a place in our grammar schools live outside of Trafford. In 2023 this equated to 363 pupils. **Currently all Trafford residents who meet the entrance requirements for a selective school can achieve a local grammar school place** and so our priority is to invest in creation of additional non-selective places, for Trafford resident pupils, with the limited funding we do receive. We do not have a need for any additional selective school places.

The following table shows the proportion of non-Trafford residents in each of the year 7 cohorts at the October census each year between 2015 and 2023:

| School                                | % Non-Trafford Residents |            |            |            |            |            |            |            |            |
|---------------------------------------|--------------------------|------------|------------|------------|------------|------------|------------|------------|------------|
|                                       | 2015                     | 2016       | 2017       | 2018       | 2019       | 2020       | 2021       | 2022       | 2023       |
| Altrincham Grammar School for Boys    | 26%                      | 25%        | 21%        | 12%        | 6%         | 15%        | 18%        | 19%        | 15%        |
| Altrincham Grammar School for Girls   | 17%                      | 23%        | 19%        | 26%        | 28%        | 18%        | 24%        | 21%        | 20%        |
| Loreto Grammar School                 | 43%                      | 42%        | 44%        | 43%        | 42%        | 36%        | 40%        | 42%        | 43%        |
| Saint Ambrose College                 | 45%                      | 53%        | 49%        | 50%        | 55%        | 64%        | 50%        | 43%        | 54%        |
| Sale Grammar School                   | 18%                      | 16%        | 23%        | 15%        | 1%         | 20%        | 5%         | 5%         | 10%        |
| Stretford Grammar School              | 28%                      | 42%        | 48%        | 46%        | 29%        | 37%        | 43%        | 37%        | 33%        |
| Urmston Grammar School                | 23%                      | 32%        | 23%        | 29%        | 41%        | 18%        | 38%        | 38%        | 36%        |
| <b>All Trafford Selective Schools</b> | <b>27%</b>               | <b>32%</b> | <b>31%</b> | <b>31%</b> | <b>28%</b> | <b>28%</b> | <b>29%</b> | <b>28%</b> | <b>29%</b> |

Trafford Council is not the admission authority for any of the grammar schools in our area, the admission authorities for these schools (their Board of Trustees) could consider reviewing the oversubscription criteria within their admissions policies to support the sufficiency position and make sure there is a Trafford First approach.

School Place Planning and Sufficiency was scrutinised by the Children and Young People's Scrutiny Committee on 24 January 2024.

### **Question 7 - Submitted by Councillor Newgrosh**

"We are now in the final year of the five-year Trafford Empty Homes Policy, what measures have Trafford council actually employed, over the last four years, to bring privately owned long term empty houses back into use? And how many privately owned houses have been brought back into use over the entirety of this scheme?"

Response:

The Council seeks to take a comprehensive approach to Long-term empty homes – and the problem is tackled by a number of different teams within the Authority, including Council Tax, Housing Standards and Planning Enforcement. Housing Standards Officers make every effort to co-ordinate and tackle long-term empty homes however this is alongside other responsibilities such a tackling serious disrepair, which will always take priority when there is a risk to life or likelihood of harm.

The Council respond to complaints relating to empty properties by visiting the property and making an assessment using an 'Empty Property Matrix', in accordance with the Empty Property Strategy. The Matrix allows Officers to allocate each property a

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unique score which is used to rank and prioritise tackling long-term empty homes. In order to make the best use of available resources only the properties that have scored highest will be actioned. In these cases, officers will attempt to trace and engage with the owner and request their proposals and timescales to return the property to use. Where the property is insecure, giving rise to vermin infestation on the land, or causing statutory nuisance, officers will take appropriate steps to ensure the owner remedies these matters. If this is unsuccessful, the officer will undertake enforcement action and works in default.

Where owners can't be traced; or are unable or unwilling to bring the property back into use, the Council must adopt a longer-term enforcement strategy. Officers will identify if certain powers can be used that allows the Council to build a case for enforced sale or compulsory purchase - both of which are costly, complex and lengthy processes; and need to be adequately resourced to be successfully progressed.

During the period of the current Empty Property Strategy, the Housing Standards Team have used their enforcement powers on multiple occasions to minimise harm to the immediate locality to secure empty properties and/or clear harbourage, vermin or accumulations of refuse on land. Two long-term empty and problematic homes have been brought back into use through enforcement action leading to considerable debts and commencement of enforced sale, which were suspended after both Owners recognised the seriousness of the Council's action and agreed to sell their properties. Without the Council's intervention these properties would have otherwise remained vacant and in a deteriorating condition, causing harm to their locality and restricting housing supply.

The Council is in the process of initiating an enforced sale of another long-term empty property in Hale; and is actively pursuing enforcement action on three empty homes in Stretford. There are other examples where officers have been successful through informal engagement and negotiation with owners, or their representatives. Officers have been able to encourage / support them to act, with the result of bringing the property back into continued housing use.

Whilst action on empty homes is led by Housing Standards Officers, they will work alongside other teams, such as Planning Enforcement and Council Tax Recovery, to utilise the widest possible range of enforcement powers and apply pressure on owners of long-term empty homes so their properties are returned to use at the earliest opportunity. Planning Enforcement recently prosecuted the owner of two long-term empty properties in Stretford for failing to comply with a S.215 Notice after they failed to **clean up the land and deal with the poor state of their buildings.**

Council Tax "Empty Property Premium" continues to be applied to long-term empty homes. Through this premium, owners are charged a progressively higher rate of Council Tax, the longer their property is left empty. Housing Standards are currently involved with two active cases and are working alongside Council Tax colleagues to recover unpaid council tax debts through liability orders, bankruptcy proceedings and seizure of property assets to return the property to use.

Housing officers also work alongside the Council's Housing Options Team to identify suitable empty homes and promote the Council's Private Sector Leasing Scheme

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where the property is leased to us and used for re-housing. Where appropriate we will also promote other schemes that in operation across Greater Manchester such as 'Let Us', which is a similar property leasing scheme operated by social landlords with a lease rent in return. Officers have recently started an Empty Property Working Group bringing together representatives from Housing Standards with Council Tax and Estates, to try and work more effectively and cooperatively in tackling empty properties.





## Local authority returns form: damp and mould in private rented properties

### Overview

Why your views matter. We are requesting information on damp and mould in privately rented homes. Thank you for taking the time to respond.

### Introduction

This form is to collect information on damp and mould in privately rented homes from local authorities. It follows a [letter](#) from the Secretary of State dated 19 November 2022.

Local authorities play a vital role in enforcing standards in the private rented sector, supporting tenants and tackling rogue landlords. The tragic death of Awaab Ishak has highlighted the importance of ensuring that tenants do not have to live with unsafe damp and mould in their homes.

The information provided through this form will enable us to better understand the issues surrounding damp and mould and will inform future on policy in this space, including how we support local authorities. We will also share this data with the LGA to inform their work. In collecting this data, we are aware that the figures over the pandemic period may not be representative of usual times, and this will be taken into account.

We also recognise that data collection systems and practices will vary from council to council, and that precise data may not be available for all of the questions listed below. Some questions have been marked as optional: however, where there is enough information available to allow a relatively robust estimate, we would welcome your support in providing as detailed a picture as possible.

We thank you very much in advance for your help to address this important issue.

If you have any queries, please email us at [housingstandards@levellingup.gov.uk](mailto:housingstandards@levellingup.gov.uk)

Details:

**1**

Please provide the full name of your local authority:

Answer

*Trafford Borough Council*

**2**

Please provide an email address of a named person we can contact with any further queries:

Answer

**3**

Approximately how many private rented sector properties are in your area currently?

Answer. Please provide a number. If you cannot answer, please write 'NA'

**18,382**

4

What data sources do you normally use to inform your knowledge of the quality and condition of the privately rented stock in your area?

- a) **Stock condition survey**
  - b) Stock modelling
  - c) Estimate based on contact with landlords/tenants
  - d) Estimate based on general knowledge of local housing stock
  - e) Housing census
  - f) Other: e.g. licensing schemes(s), council tax, please provide details (below)
- Please select all that apply*

### **Prevalence of damp and mould**

The following questions relate to your assessment of damp and mould issues in your local authority area. If you are not able to provide a response to any of the following questions, please respond with 'n/a'.

5

Approximately what number of full-time equivalent (FTE) do you have in your housing enforcement team? In answering, please provide the number of all staff working on private rented sector standards, enforcement and licensing, including how many FTE Environmental Health Officers are carrying out enforcement, plus those that work in administrative and managerial roles, but not including legal resource. Also please do not include staff who only work on MEES. Where a staff member works on MEES alongside other housing enforcement, please include them in your FTE numbers.

3

6

Do you run any Selective and/or Additional Licensing schemes in your area?

**Neither**

7

If you do run any licensing schemes, approximately how many properties are covered by your scheme(s)? Please break down by each individual Selective/Additional licensing scheme

Optional

**N/A**

8

Based on your assessment of damp and mould issues affecting private rented sector properties in your area, approximately what proportion do you currently estimate to have category 1 damp and mould hazards?

**Less than 1% (estimate only and largely based on difficulty in scoring damp and mould as Category 1 under the scheme)**

9

What data sources do you normally use to come to the assessment provided in question 8?

- a) **Stock condition survey**

- b) Stock modelling
  - c) Estimate based on contact with landlords/tenants
  - d) Estimate based on general knowledge of local housing stock
  - e) Other e.g. licensing schemes(s), council tax etc.: (please specify below)
- Please select all that apply*

### **Enforcement Questions: complaints**

The following questions relate to damp and mould complaints and inspections in your local authority area. If you are not able to provide a response to any of the following questions, please respond with 'n/a'.

**10**

Based on your assessment of damp and mould issues affecting private rented sector properties in your area, approximately what proportion do you currently estimate to have category 2 damp and mould hazards?

12%

**11**

What data sources do you normally use to come to the assessment provided in question 9?

- a) Stock condition survey
  - b) Stock modelling
  - c) Estimate based on contact with landlords/tenants
  - d) Estimate based on general knowledge of local housing stock
  - e) Other e.g. licensing schemes(s), council tax etc.: (please specify below)
- Please select only one item*

**12**

If you have not collected the information requested or are not able to provide information in this way, please can you tell us why? Please put n/a if you have provided the above data.

Answer

N/A

**13**

Please tell us what steps you take when you receive a complaint about damp and mould from a private rented sector tenant. Where relevant, please refer to or provide links to any enforcement policies you have in place (e.g. on enforcing category 2 hazards) and any guidance you might provide for tenants experiencing damp and mould issues.

1. Request that the tenant completes our online disrepair reporting form found at <https://www.trafford.gov.uk/residents/housing/housing-standards/Report-disrepair-in-your-privately-rented-property.aspx>, including providing evidence of their written report about the issue to their landlord and/or agent. If property is owned by a Housing Association the tenant is asked to follow the Housing Association formal complaints procedure and contact the Housing Ombudsman, prior to completing our online referral.
2. Send tenant a link to an advice leaflet regarding damp and condensation (<https://www.nea.org.uk/wp-content/uploads/2020/07/Dealing-with-damp-and-condensation-2019.pdf>).
3. Send an initial letter to the landlord and/or agent to notify them of the issue and request that they make arrangements to inspect the property and contact the Council to outline their plans for remedial action within a specific time period (usually 28 days).

4. If no or an inadequate response is received, an inspection of the property will be arranged under section 239 of the Housing Act 2004 to assess any hazards and determine whether enforcement action is required. Where applicable, enforcement notices are then served following a HHSRS assessment.
5. If an inspection takes place but no defects are identified which relate to dampness and mould growth, a letter will be sent to tenants confirming the outcome of the inspection and providing advice.

14

Overall, how many complaints relating to housing standards have you received in the last three financial years that reference or relate to damp and mould issues in the private rented sector?

Answer - 2019/2020

89

Answer - 2020/2021

90

Answer - 2021/2022

80

#### **Enforcement Questions: category 1 damp and mould hazards**

The following questions ask for the number of category 1 damp and mould hazards identified broken down by inspections resulting from complaints, licensing, stock modelling and other reasons.

If you are not able to provide a response to any of the following questions, please respond with 'n/a'.

15

Of the complaints you received that reference damp and mould in the last three financial years, approximately how many resulted in inspections?

Answer - 2019/2020

26

Answer - 2020/2021

16

Answer - 2020/2021

19

16

If you have not collected the information requested or are not able to provide information in this way, please can you tell us why? Please put n/a if you have provided the above data.

Answer

Data has been provided for Q17 but this is not a true reflection of the number of inspections completed by officers. The true number will be a lot higher, but due to lack of coding being used to record visits in our management information system, this information is not readily

available. Officers are now using coding to record all visits, so in the future it will be easier to run figures off for future reports.

**17**

Approximately how many inspections have you undertaken overall in the last three financial years?

Answer - 2019/2020

44

Answer - 2020/2021

52

Answer - 2021/2022

82

**18**

Thinking now ONLY about all of the inspections that you undertook as a result of complaints, approximately how many have identified a category 1 damp and mould hazard?

Answer - 2019/2020

0

Answer – 2020/2021

0

Answer - 2021/2022

1

### **Enforcement Questions: category 2 damp and mould hazards**

The following questions ask for the number of category 2 damp and mould hazards identified broken down by inspections resulting from complaints, licensing, stock modelling and other reasons. If you are not able to provide a response to any of the following questions, please respond with 'n/a'.

**19**

Thinking now ONLY about all the inspections that you undertook as a result of licensing, approximately how many have identified a category1 damp and mould hazard?

Answer - 2019/2020

0

Answer - 2020/2021

0

Answer - 2021/2022

0

**20**

Thinking now ONLY about all the inspections that you undertook as a result of stock modelling, approximately how many have identified a category 1 damp and mould hazard?

Answer - 2019/2020

N/A

Answer - 2020/2021

N/A

Answer - 2021/2022

N/A

## 21

Thinking now ONLY about all the inspections that you undertook for reasons other than complaints, licensing or stock modelling, approximately how many have identified a category 1 damp and mould hazard?

Answer - 2019/2020

N/A

Answer - 2020/2021

N/A

Answer - 2021/2022

N/A

## 22

If you have not collected the information requested above or are notable to provide information in this way, please can you tell us why? Please put n/a if you have provided the above data.

answer

*Information is reported in q23 however not all visits will result in a HHSRS assessment being undertaken and recorded so these figures will be higher in reality. Formal HHSRS assessments will be undertaken when officers are considering taking formal enforcement action.*

*With regards to Q24, over the 3 years, damp has been identified in 8 licensable HMOs, which was raised informally with the licence holder and rectified accordingly. No HHSRS assessment was undertake however and so we are unable to confirm whether the hazards were category 1 or 2.*

## 23

Thinking now ONLY about all the inspections that you undertook as a result of complaints, approximately how many have identified a category 2 damp and mould hazard?

Answer - 2019/2020

5

Answer - 2020/2021

4

Answer - 2021/2022

6

## 24

Thinking now ONLY about all the inspections that you undertook as a result of licensing, approximately how many have identified a category2 damp and mould hazard?

Answer - 2019/2020

0

Answer - 2020/2021

0

Answer - 2021/2022

0

## 25

Thinking now ONLY about all the inspections that you undertook as a result of stock modelling, approximately how many have identified a category 2 damp and mould hazard?

Answer - 2019/2020

N/A

Answer - 2020/2021

N/A

Answer - 2021/2022

N/A

## 26

Thinking now ONLY about all the inspections that you undertook for reasons other than complaints, licensing or stock modelling, approximately how many have identified a category 2 damp and mould hazard?

Answer - 2019/2020

N/A

Answer - 2020/2021

N/A

Answer - 2021/2022

N/A

## Enforcement action

The following questions ask for figures on enforcement action taken in relation damp and mould hazards, including the number of improvement notices and civil penalty notices issued and the number of prosecutions.

If you are not able to provide a response to any of the following questions, please respond with 'n/a'.

## 27

If you have not collected the information requested above or are notable to provide information in this way, please can you tell us why? Please put n/a if you have provided the above data.

answer

N/A

## 28

Please provide the figures for all formal and informal enforcement action taken on damp and mould hazards:

Answer - 2019/2020

60

Answer - 2020/2021

70

Answer - 2021/2022

57

**29**

Please provide the figures for improvement notices issued in relation to damp and mould hazards:

Answer - 2019/2020

4

Answer - 2020/2021

7

Answer - 2021/2022

5

**30**

Please provide the figures for civil penalty notices issued in relation to damp and mould hazards:

Answer - 2019/2020

0

Answer - 2020/2021

0

Answer - 2021/2022

0

Wider context

**31**

Please provide the figures for prosecutions pursued in relation to damp and mould hazards:

Answer - 2019/2020

0

Answer - 2020/2021

0

Answer - 2021/2022

0

**32**

Please provide the figures for successful prosecutions in relation to damp and mould hazards:

Answer - 2019/2020

0

Answer - 2020/2021

0



Answer - 2021/2022

0

### 33

Please rank in priority order (1 - the highest impact / 6 - the least impact) how the following have had an impact on enforcement action relating to damp and mould in your area  
1 2 3 4 5 6

a) Capacity of your local authority. i.e. resource and funding hindering capacity to take enforcement action relating to damp and mould.

1

b) Experience and expertise in the local authority. i.e. a lack of officers with experience, for example, experience pursuing prosecutions or expertise within the team including, for example, legal expertise.

6

c) Strategic prioritisation of private rented sector enforcement. i.e. competing priorities leading to relatively lower prioritisation of enforcement action or proactively enforce.

3

d) The regulatory/ legal framework for enforcement activity. i.e. too much complexity in legislation.

2

e) Issues with gathering or providing evidence. i.e. tenants reluctant to provide statements or difficulties gathering the requisite evidence for issuing a fine or prosecuting.

4

f) Limited data on the private rented stock. i.e. difficulties identifying private rented properties or insufficient resource to map out private rented stock.

5

### 34

Please say why you have ranked the items on question 31 in this order

The highest impact on the Private Sector Housing team is capacity due to the small number of Officers and high workload. The number of complaints the team receive to investigate has increased significantly over the past 10 years. Issues such as the tragic death of Awaab Ishak in Rochdale and the subsequent media coverage has resulted in the team seeing an increase in the number of complaints regarding damp and mould. The second highest impact is the regulatory framework as additional legislation keeps coming into force but doesn't necessarily make it easier for the officers to undertake enforcement work. Strategic prioritisation has also been ranked highly due to conflicting priorities the team face. The Homes for Ukraine work for example is recognised as an important piece of work but has put the small team under increased pressure to deal with these inspections and follow up work, at a time when their complaint work for private rented properties has increased. This work is still continuing to place demands on the team, especially in a Borough like Trafford, where the uptake of the scheme has been especially high.

**35**

Does the Housing Health and Safety Rating System (HHSRS) allow for an effective assessment of how serious and dangerous damp and mould is in people's homes?

Yes

No

Not sure

**36**

If not, what changes should be made to the HHSRS, to the system for categorising hazards or to enforcement powers under the Housing Act 2004?

The system is too subjective and complicated. A set of minimum standards would therefore be welcomed.

**37**

What other measures would help you to better prioritise addressing housing enforcement issues such as damp and mould?

Additional funding provided to Council's specifically to use as a works in default budget so that property conditions can be improved, rather than just penalising landlords through notice charges, financial penalties and prosecutions.