Cumberland Council:

Private Sector Stock Condition Study 2024/25

Report of Findings

May 2025

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Contents

1. Introducing the Study

Background to the project

Introduction

1.1 Opinion Research Services (ORS) was commissioned by Cumberland Council to prepare a Private Housing Stock Condition Study (The HSCS 2024). Local authorities have an obligation under the Housing Act 2004 to keep housing conditions in their area under review for all tenures, including private sector housing. Figure 1 shows a map of the study area.

Figure 1: Map of the Study Area: (Source: Ordnance Survey)

1.2 In recent years, the modelling of housing stock condition has evolved considerably. Much more secondary data has been published, including access to all Energy Performance Certificates (EPC) conducted across the whole of England since 2008. This means that fewer households surveys are typically required for a stock condition study.

1.3 Using information from the English Housing Survey (EHS), the Council's own data, and a range of available secondary data, including the full Energy Performance Certificate (EPC) record, Census data, DWP benefit claim records, Valuation Office Agency (VOA) record for council tax, Land Registry records for house prices and a wide range of Office for National Statistics (ONS) data, it is possible to estimate the condition of the housing stock of the area without undertaking any physical surveys. For example, it is known that older properties and those in the private rented sector are likely to be in poorer condition, while new builds and those in the social rented sector are likely to be more energy efficient and in better condition. Using this information, it is possible to derive estimates at parish level for the condition of the housing stock.

1.4 While the central focus of this study is on the private sector stock; we have also included many instances of data relating to the affordable sector for purposes of completeness.

The Council's Obligations and Powers

1.5 Councils have an obligation to enforce certain statutory minimum standards in housing and have powers that they can use to do this, while further non-mandatory powers are available to the Authority under a range of legislation including the Housing Act 2004.

1.6 Local authorities are also required by Government to complete certain returns indicating the distribution of their housing stock by tenure and the condition of certain aspects of the stock.

Guidance regarding House Condition Surveys

1.7 Guidance on how to conduct surveys has evolved over time:

- Local House Conditions Survey Guidance (1993; updated 2000): the Department of the Environment issued a Guidance Manual setting out how Local House Condition Surveys should be conducted, including a detailed survey form in a modular format, and a step-by-step guide to implementing a survey.
- Housing Health and Safety Rating System Guidance (HHSRS) (guidance was issued in 2004; updated 2006).

1.8 Local authorities are encouraged, by both sets of guidance, to make full use of information gathered from house condition surveys in conjunction with data from other sources.

Comparing the Study Area with England

1.9 To gain an understanding of how the study area compares to the rest of England, ORS used the English Housing Survey (EHS) and other data for the whole of the North West and also for the whole of England in many of the tables. This places Cumberland's data into wider context.

1.10 The figures presented in this report are estimates. Quoting an exact figure for any number, for example: the number of privately rented dwellings which are non-decent is not necessary and would not be accurate.

Percentages within the report are only quoted to whole numbers or one decimal place for the same reason. An additional reason for doing this is that most issues will be changing on a daily basis across a housing stock of this size, so the results can only ever be a snapshot in time.

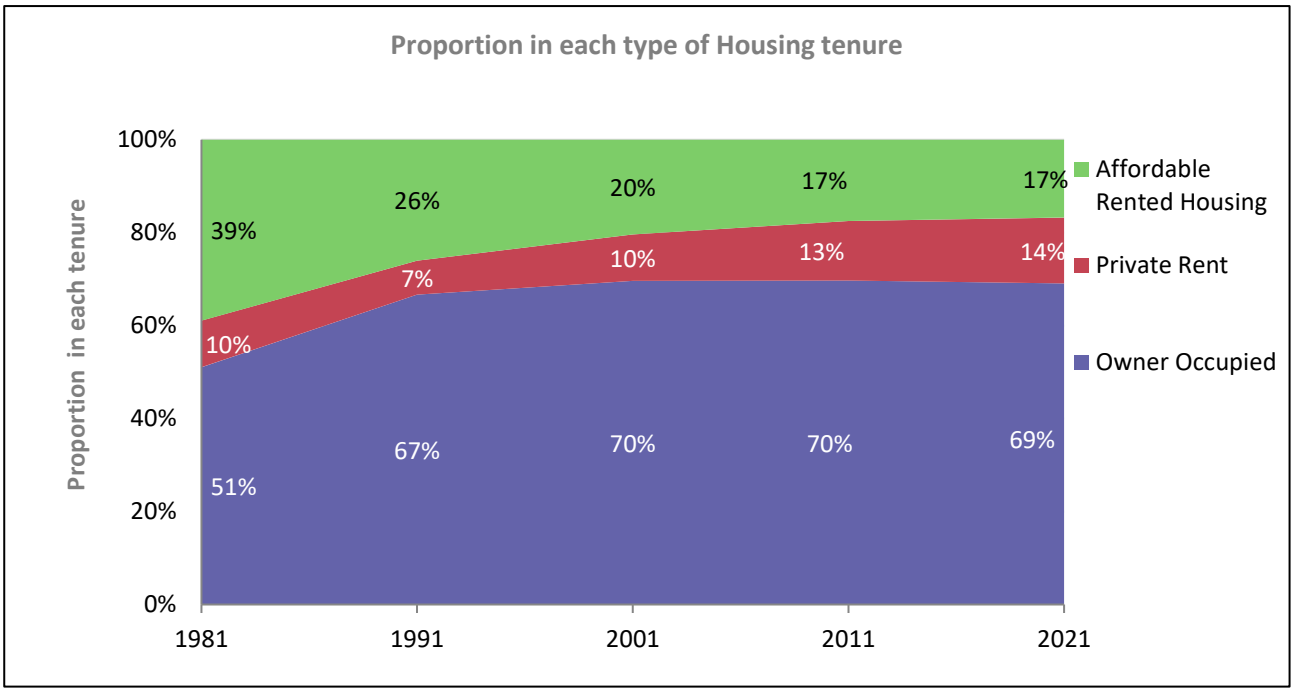
2. Housing Profile

The Housing Stock of Cumberland

Housing Tenure Trends

2.1 When considering the local housing market, it is worth noting the changes to tenure over the past forty years. Figure 2 shows how the most notable change has been the decline in the proportion of people in affordable rented properties from 39% in 1981 to 17% in 2021. In contrast, both private rent and owner-occupied properties have seen a growth. Between 1981 and 1991 there was a strong increase in owner occupiers, partly because of the introduction of Right to Buy policies. This peaked at 70% in Cumberland. Between 1981 and 2021 around 16,000 properties have been sold from affordable housing to become market housing, many of the which are likely due to the impact of Right to Buy policies introduced in 1985.

Figure 2: Housing tenure trends for Cumberland (1981 – 2021). Source: UK Census of Population



2.2 During the same period the actual volume of housing in Cumberland has risen from 95,060 to 125,425 households. Importantly, the volume of households in affordable rented housing has fallen in Cumberland between 1981 and 2021. Figure 3 below provides detailed data for the period.

Figure 3: Number of Households in Cumberland by Tenure 1981-2021 (Source: UK Census of Population)

	Number of Households					Net Change			
	1981	1991	2001	2011	2021	1981-1991	1991-2001	2001-2011	2011-2021
Owner occupied	48,540	70,286	78,826	84,515	86,688	21,746	8,540	5,689	2,173
Private rent	9,514	7,741	11,342	15,558	17,723	-1,773	3,601	4,216	2,165
Affordable Rented Housing	37,006	27,427	23,062	21,150	21,014	-9,579	-4,365	-1,912	-136
TOTAL	**95,060**	**105,454**	**113,230**	**121,223**	**125,425**	**10,394**	**7,776**	**7,993**	**4,202**

2.3 Figure 4 shows that owner occupation in Cumberland is much greater than the levels of the North West and England as a whole, while private rented housing is correspondingly lower.

Figure 4: Percentage of Households by Tenure 2021 (Source: UK Census of Population)

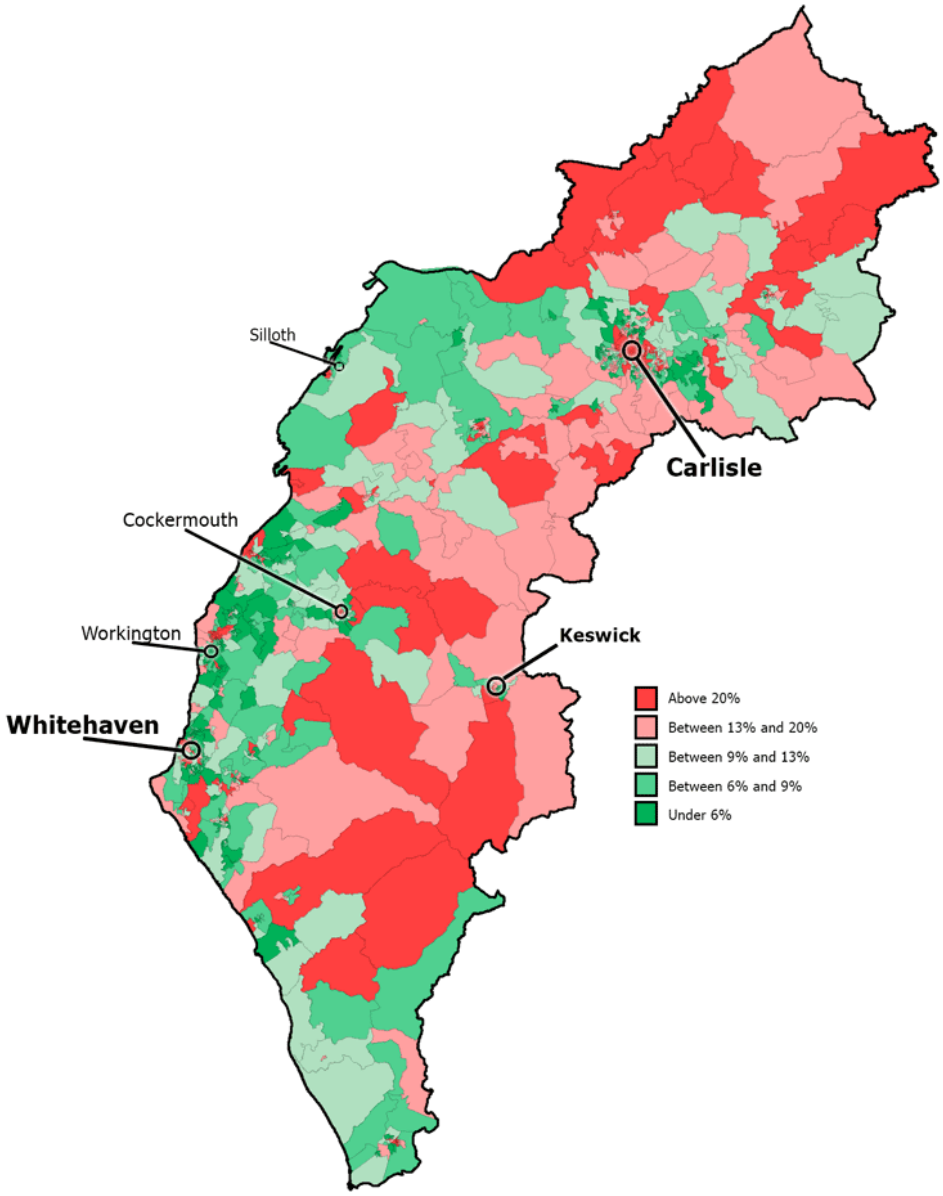
	Percentage of Households		
	Cumberland	North West	England
Owner occupied	69%	63%	62%
Private rent	14%	19%	21%
Affordable Rented Housing	17%	18%	17%
TOTAL	**100%**	**100%**	**100%**

Figure 5: Change in Percentage of Households by Tenure 2011- 2021 (Source: UK Census of Population)

	Percentage of Households		
	Cumberland	North West	England
Owner occupied	-0.6%	-2.0%	-1.8%
Private rent	1.3%	2.7%	2.4%
Affordable Rented Housing	-0.7%	-0.7%	-0.6%
TOTAL	**0%**	**0%**	**0%**

2.4 Figure 6 shows that the private rented sector forms a higher share of the dwelling stock in the centre of Carlisle, but also in many of the rural parishes. The colour runs from dark green for low figures to bright red for high numbers and each colour band represents 20% of the parishes in Cumberland. However, the type of private renting is likely to vary by area, with the rural areas including many who are renting tied accommodation or who are living rent free as part of the work.

Figure 6: Private Rented Sector by Parish 2021 (Source: UK Census of Population)



The Private Rented Sector

2.5 The long-term growth in the private rented sector in Cumberland is consistent with national trends. Growth in the sector seems likely to continue, driven by a combination of demand and supply factors:

- Increasing demand from more households;
- Recent reductions in incomes (in real terms);
- Affordability of owner occupation reducing;
- Changing Bank lending practices;
- The impact of inheritance and the difficulties involved in selling properties;
- Pensions reform: pension drawdowns invested in buy to let property.

2.6 As the PRS expands and other sectors contract, it is clear that many households who would traditionally meet their housing needs in other sectors are now renting privately. This includes many households currently unable to afford their housing costs, which can be seen from the expansion of families receiving housing benefit in the sector, in particular since the start of the most recent recession.

2.7 Importantly, the Government sees the PRS having a significant and long-term role in meeting the housing need of the nation; and although the National Planning Policy Framework (NPPF) and housing needs Planning Practice Guidance (PPG) do not mention the current or future role of housing benefit, the policy to support low-income households in the private rented sector with housing benefit is long-standing and housing benefit is explicitly factored into the long-term forecasts for public spending.

2.8 Policy by both Government and Local Authorities is focused on improving Management and Maintenance in the sector (via licensing or self-regulation schemes) and expanding supply[1] (including the Build to Rent investment scheme[2]). The Government published "*A Fairer Private Rented Sector*" in June 2022[3], and the Executive summary stated:

> *"The role of the Private Rented Sector (PRS) has changed in recent decades, as the sector has doubled in size, with landlords and tenants becoming increasingly diverse. Today, the sector needs to serve renters looking for flexibility and people who need to move quickly to progress their careers, while providing stability and security for young families and older renters."*

2.9 Given this context, it is important for local authorities to recognise the role of the private rented sector at a local level. It remains appropriate to recognise that the private rented sector will continue to make an important contribution towards providing housing options for households unable to afford their housing costs in the future.

Housing Property Type Trends

2.10 Figure 7 showed an overall increase in properties occupied from the 2011 Census to the 2021 Census, with the largest increase being in detached houses, followed by semi-detached. It is noteworthy that fewer terraced properties were occupied. Vacancy rates were higher in the 2021 Census, so it may be that some of these properties were empty, but many properties have also been converted into flats.

[1] https://www.gov.uk/government/publications/private-rented-homes-review-of-the-barriers-to-institutional-investment
[2] https://www.gov.uk/government/publications/build-to-rent-round-2-initial-due-diligence
[3] https://www.gov.uk/government/publications/a-fairer-private-rented-sector

Figure 7: Number of Households in Cumberland by Property Type 2011-2021 (Source: UK Census of Population)

	Number of Households		Change
	2011	2021	2011-2021
Detached	29,836	32,689	2,853
Semi-detached	43,114	45,301	2,187
Terraced	36,248	35,542	-706
Flat or maisonette (purpose-built or converted)	10,387	10,542	155
Other (e.g. caravan or other mobile/temporary structure)	1,399	1,350	-49
TOTAL	**120,984**	**125,424**	**4,440**

2.11 Figure 8 shows how flats in Cumberland have changed over time. The 2021 Census indicates a decrease in the number of purpose-built flats and flats associated with commercial buildings, but an increase in the number of converted / shared houses. Again, the data is consistent with terraced properties having been converted into flats.

Figure 8: Number of Households in Cumberland by Flat Type 2011-2021 (Source: UK Census of Population)

	Number of Households		Change
	2011	2021	2011-2021
Purpose-built flat	8,896	8,200	-696
Part of a converted or shared house including bedsits	1,491	2,342	851
In a commercial building	931	812	-119
TOTAL	**11,318**	**11,354**	**36**

2.12 Figure 9 brings together the information on property type and tenure. Detached and semi-detached houses are shown to form the core basis for the owner-occupied stock. The private rented sector is mostly terraced houses, semi-detached houses, and flats.

Figure 9: Number of Households in Cumberland by Property Type and Tenure 2021 (Source: UK Census of Population)

	Number of Households		
	Owner Occupied	Private Rented	Affordable Rented Housing
Detached	29,250	2,394	1,045
Semi-detached	31,772	4,434	9,095
Terraced	22,813	6,680	6,052
Flat or maisonette (purpose built or converted)	2,395	4,135	4,823
Other (e.g. caravan or other mobile/temporary structure)	458	81	0
TOTAL	**86,688**	**17,724**	**21,015**

2.13 The flats listed above in Figure 9 can be broken down into flat types, as seen below in Figure 10.

Figure 10: Number of Households in Cumberland by Flat Type and Tenure 2021 (Source: UK Census of Population)

	Number of Households		
	Owner Occupied	Private Rented	Affordable Rented Housing
Purpose Built Flat	1,699	2,156	4,345
Part of a converted or shared house including bedsits	186	876	287
Part of another converted building	337	517	137
In a commercial building	173	586	54
TOTAL	**2,395**	**4,135**	**4,823**

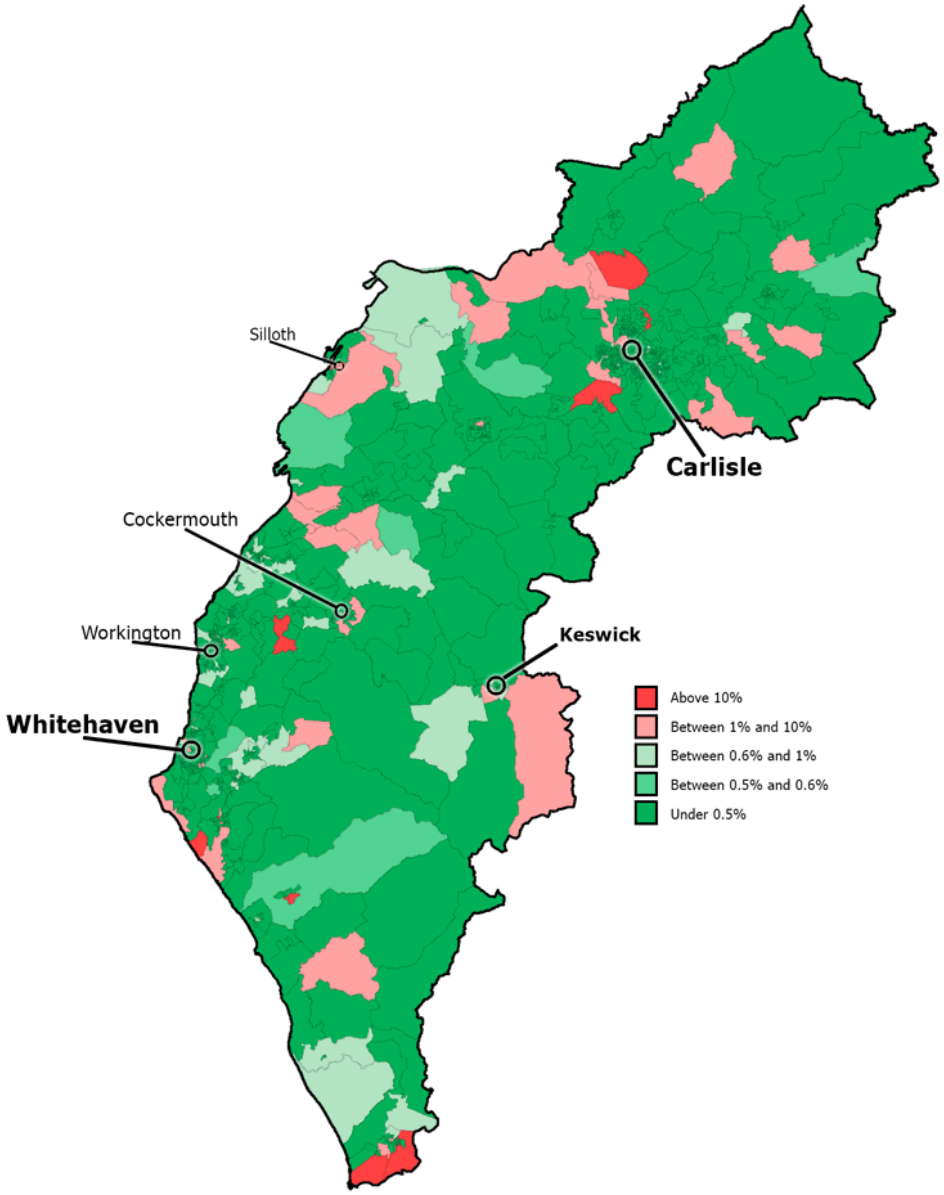
2.14 Figure 11 shows the proportions of each property type in Cumberland compared to the North West and England as a whole. There is a significantly higher proportion of detached properties in Cumberland compared to the North West and England. Flats form a lower proportion.

Figure 11: Percentage of Households by Property Type 2021 (Source: UK Census of Population)

	Percentage of Households		
	Cumberland	North West	England
Detached	26.1%	19.0%	22.9%
Semi-detached	36.1%	36.8%	31.5%
Terraced	28.3%	28.1%	23.0%
Flat or maisonette	9.1%	15.8%	22.2%
Caravan or other	0.4%	0.3%	0.4%
TOTAL	**100%**	**100%**	**100%**

2.15 In total, park homes make up only 0.4% of the housing stock of Cumberland, but this does vary by area. Figure 12 shows that for a small number of parishes they form more than 10% of the housing stock. This is important because when stock condition tests are applied to park homes, they are typically deemed to have issues with being difficult to heat and insulate.

Figure 12: Park Homes by Parish 2021 (Source: UK Census of Population)



Second Homes, Holiday Lets and Other Short Term Lets

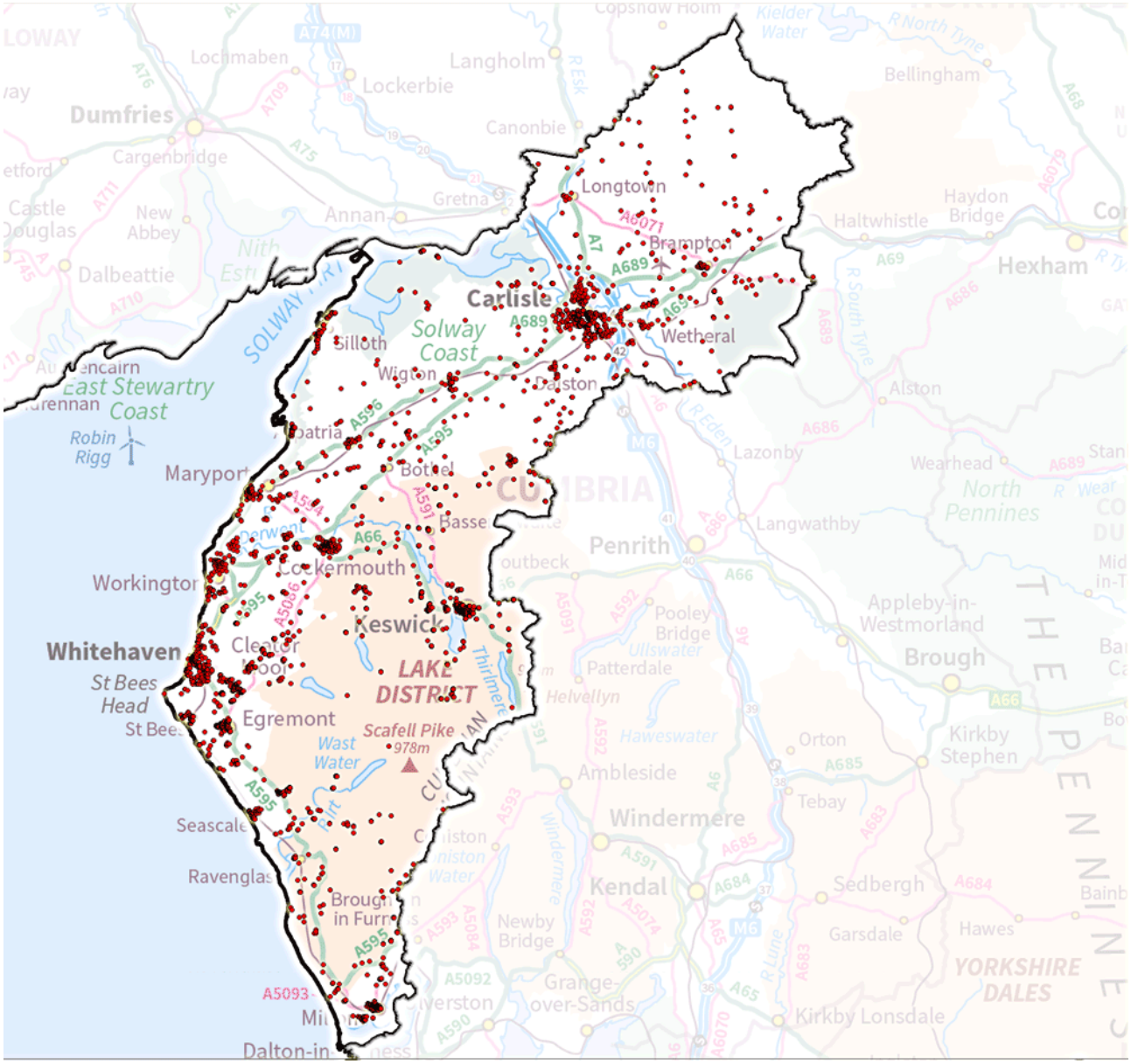
2.16 In recent years, an increasing share of the housing stock of the country has been moved to provide holiday lets through websites such as Airbnb, Booking.com and TripAdvisor while other property has been held either as second homes or as property which is held as a potential investment opportunity. In October 2024, a total of 1,679 properties (excluding private rooms) were listed in Cumberland, which represents over 1.5% of the private housing stock.

2.17 Data from the Census shows that the vacancy rate for Cumberland rose from 5.3% in 2011 to 6.9% in 2021, so short-term lets and second homes do not appear to explain all of this change. Unfortunately, there is little historic data for short-term lets so it is not possible to compare the data to the past situation.

2.18 Figure 13 shows the properties in Cumberland which are registered as second homes on their Council Tax. From 1st April 2025, a 100% council tax premium applies to unoccupied and substantially furnished properties that is no-one's sole or main residence (commonly referred to as second homes). While many are

in rural areas and in market towns like Keswick and Cockermouth, there are also a surprising number in Carlisle, Workington and Whitehaven. Therefore, the second homes are likely to not just be holiday homes used for part of the year, but also properties which have been inherited, or used on a part-time basis by workers who have their main home elsewhere in the country.

Figure 13: Second Homes in 2024 (Source: Council Tax Records)



Age of the Housing Stock

2.19 The Valuation Office Agency (VOA) Council Tax database contains records of when a property was built. For Cumberland, 25% of the total stock was built before 1900, and almost two fifths were built before 1939. It should be remembered that the best predictor for the overall condition of the housing stock of an area is the age of the properties.

Figure 14: Number of Households in Cumberland by Property Age 2024 (Source: VOA Council Tax: 2024)

	Number of Properties
Pre 1900	34,300
1900-1939	16,770
1945 - 1972	36,340
1973 - 1999	27,270
2000-2012	10,640
2013-2024	10,160
TOTAL	**135,480**

2.20 Across the parishes of Cumberland, there is a very large difference in the age of the properties (Figure 15 and Figure 16). Over 50% of the stock for large areas of the Lake District National Park and also for rural areas outside of Carlisle were built before 1900, which will clearly impact upon the condition of the stock in these areas.

Figure 15: Percentage of Dwellings Built Before 1900 by Parish (Source: VOA Council Tax: 2023)

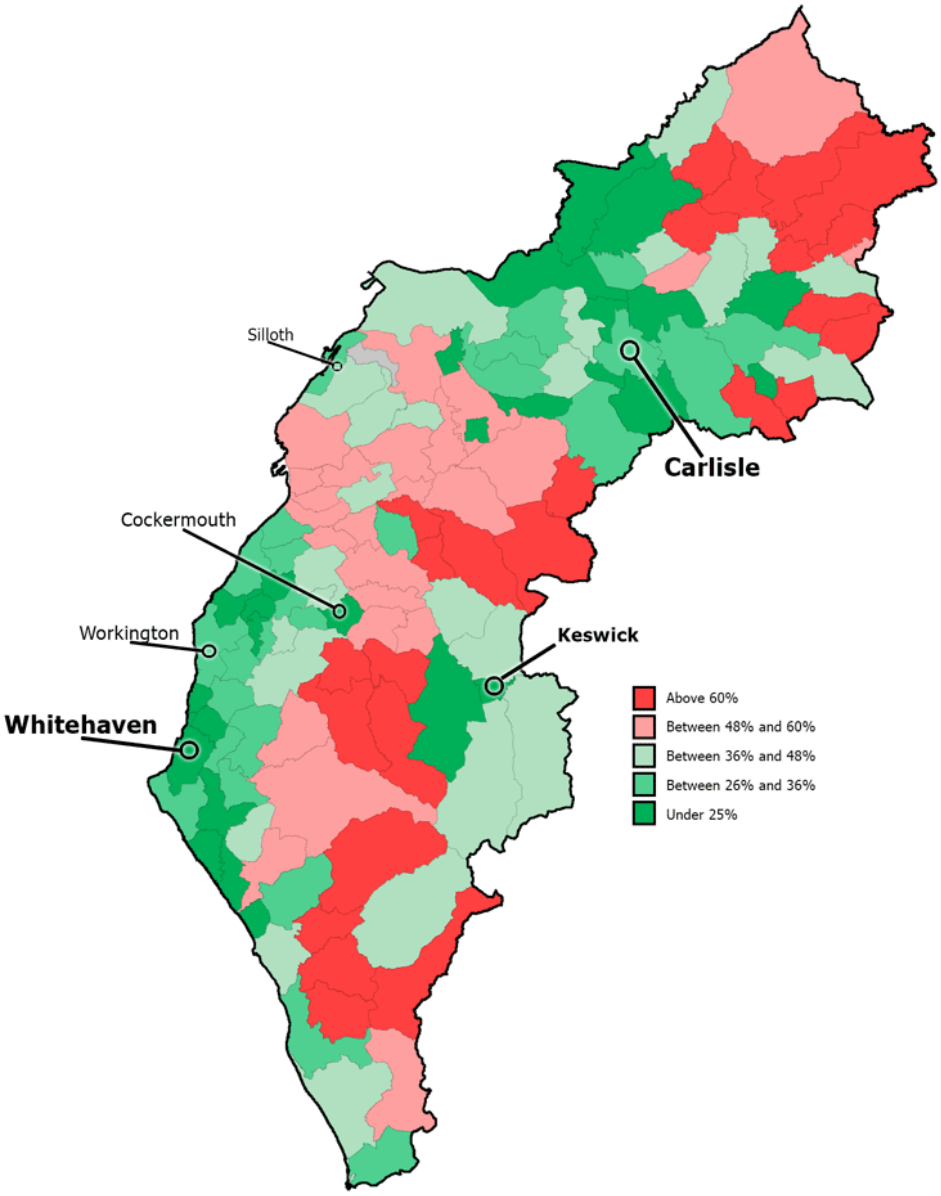
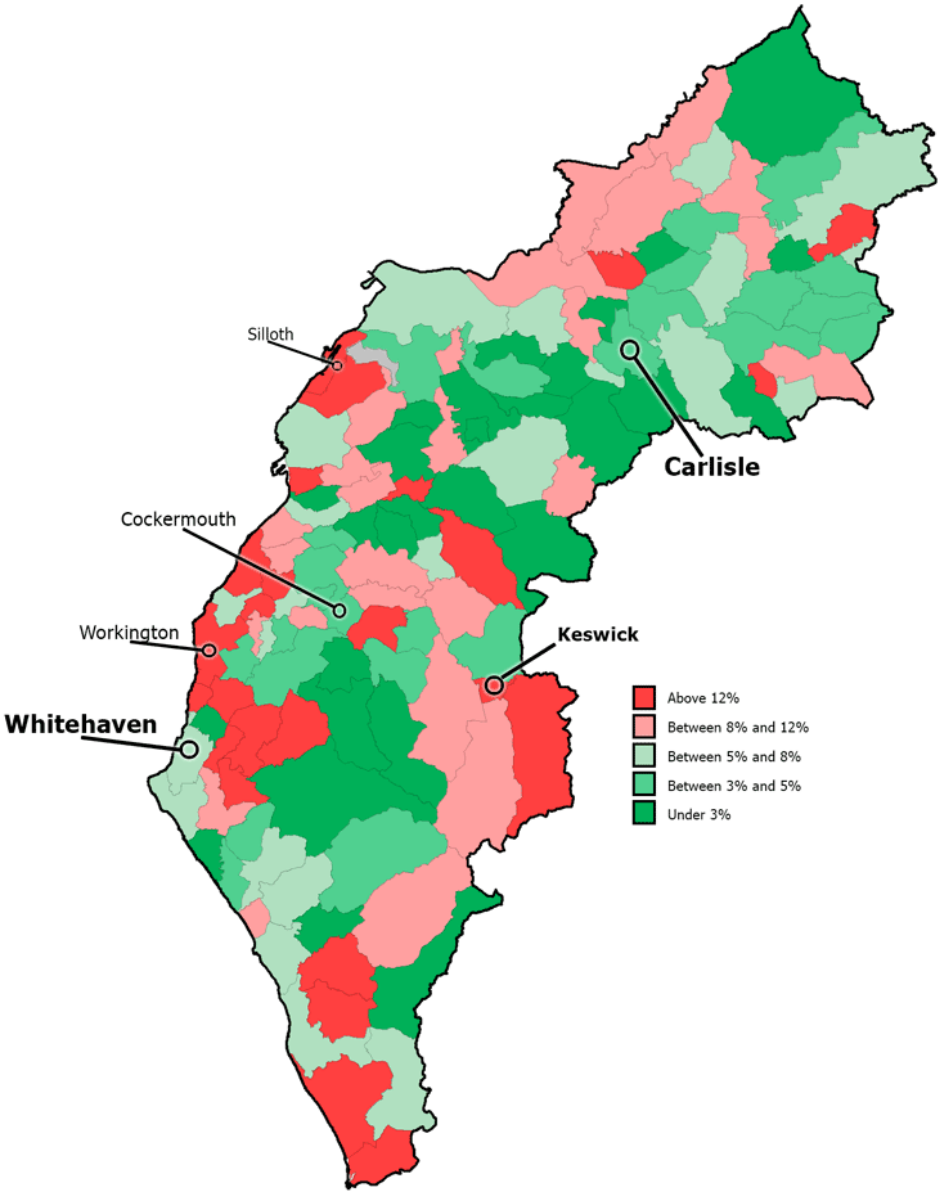


Figure 16: Percentage of Dwellings Built Between 1900 and 1939 by Parish(Source: VOA Council Tax: 2023)



2.21 Overall, the age of housing stock of Cumberland contains a far higher share of dwellings which were built before 1900 than that of the wider North West or for England as a whole (Figure 17). However, it may be noted that Cumberland has a lower proportion of properties built between 1900-1939 in comparison.

Figure 17: Percentage of Dwellings by Property Age 2024 (Source: VOA Council Tax: 2024)

	Percentage of Dwellings		
	Cumberland	North West	England
Pre 1900	25.3%	17.7%	15.2%
1900-1939	12.4%	22.5%	20.2%
1945 – 1972	26.8%	25.3%	25.9%
1973 – 1999	20.1%	19.2%	21.0%
2000-2012	7.9%	7.6%	8.7%
2013-2024	7.5%	7.8%	9.0%
TOTAL	**100%**	**100%**	**100%**

Overcrowding

2.22 The Census 2021 calculates whether a property is overcrowded or under-occupied based upon the bedroom standard. This is calculated by comparing the number of bedrooms the household requires to the number of available bedrooms.

2.23 The number of bedrooms the household requires is calculated according to the Bedroom Standard, where the following should have their own bedroom:

1. Adult couple
2. Any remaining adult (aged 21 years or over);
3. Two males (aged 10 to 20 years);
4. One male (aged 10 to 20 years) and one male (aged 9 years or under), if there are an odd number of males aged 10-20;
5. One male aged 10-20 if there are no males aged 0-9 to pair with him;
6. Repeat steps 3-5 for females;
7. Two children (aged 9 years or under) regardless of sex;
8. Any remaining child (aged 9 years or under).

2.24 An occupancy rating of:

- -1 or less implies that a household's accommodation has fewer bedrooms than required (overcrowded);
- +1 or more implies that a household's accommodation has more bedrooms than required (under-occupied);
- 0 suggests that a household's accommodation has an ideal number of bedrooms.

2.25 Across Cumberland as a whole, the proportion of overcrowded households declined slightly between the 2011 and 2021 Censuses. This saw the overcrowding rate decrease from 2.0% to 1.2% overall. It is important to note that 82% of all households technically under-occupy their housing according to the bedroom standard, with 43.4% of households under-occupying by 2 or more bedrooms. Only 0.1% of households are overcrowded by 2 or more bedrooms.

Figure 18: Under-occupation and Overcrowding in Cumberland 2011-2021 (Source: UK Census of Population)

	Percentage of Households		
	2011	2021	2011-2021
Under-occupied by 2+ bed rooms	39.9%	43.4%	3.5%
Under-occupied by 1 bedroom	39.4%	38.3%	-1.1%
Correct number of rooms	18.7%	17.1%	-1.6%
Overcrowded by 1 bedroom	1.8%	1.1%	-0.7%
Overcrowded by 2+ bedrooms	0.2%	0.1%	-0.1%
TOTAL	**100%**	**100%**	**0%**

2.26 The highest rate of overcrowding in Cumberland occurs in the affordable housing sector at 2.6%, while the private rented sector has a rate of 2.0% overcrowding, and owner occupied properties is at 0.7%.

Figure 19: Under-occupation and Overcrowding by Tenure 2021 (Source: UK Census of Population)

	Percentage of Households			
	Owner Occupied	Private Rented	Affordable Rented Housing	Total
Under-occupied by 2+ bed rooms	55.3%	20.9%	13.1%	43.4%
Under-occupied by 1 bedroom	34.9%	48.9%	43.4%	38.3%
Correct number of rooms	9.0%	28.2%	40.9%	17.1%
Overcrowded by 1 bedroom	0.6%	1.8%	2.4%	1.1%
Overcrowded by 2+ bedrooms	0.1%	0.2%	0.2%	0.1%
TOTAL	**100%**	**100%**	**100%**	**100%**

2.27 Overcrowding rates in Cumberland are much lower to those in the North West and England as a whole, with correspondingly higher rates of under-occupying.

Figure 20: Under-occupation and Overcrowding by Area 2021 (Source: UK Census of Population)

	Percentage of Households		
	Cumberland	North West	England
Under-occupied by 2+ bed rooms	43.4%	36.0%	35.6%
Under-occupied by 1 bedroom	38.3%	36.0%	33.2%
Correct number of rooms	17.1%	24.6%	26.8%
Overcrowded by 1 bedroom	1.1%	2.8%	3.6%
Overcrowded by 2+ bedrooms	0.1%	0.5%	0.7%
TOTAL	**100%**	**100%**	**100%**

Council Tax Bands

2.28 As well as identifying the age of properties, the Valuation Office Agency (VOA) database also highlights the Council Tax bands for areas. Just under half of all properties in Cumberland are in Band A, which is the lowest band (Figure 21). The Council Tax band of a property is not impacted by its Condition, but different Council Tax bands are linked to different stock condition issues, so the Council Tax band enters into our assessment of hazards and non-decent homes.

Figure 21: Percentage of Properties in Cumberland by Council Tax Band 2023/24 (Source: VOA Council Tax: 2024)

BAND	Percentage of Properties
A	46.7%
B	18.8%
C	14.7%
D	11.1%
E	6.0%
F	2.1%
G	0.7%
H	0.0%
TOTAL	**100%**

2.29 The housing stock of Cumberland sit in much lower Council Tax bands than the wider North West or England as a whole. In the North West as a whole, 60.5% of the stock is in Bands A or B versus 65.5% in Cumberland, with 5.1% in Bands F-H compared to 2.8% in Bands F-H in Cumberland.

Figure 22: Percentage of Dwellings by Council Tax Band 2023/24 (Source: VOA Council Tax: 2024)

	Percentage of Households		
	Cumberland	North West	England
A	46.7%	40.1%	23.8%
B	18.8%	20.4%	19.5%
C	14.7%	17.8%	22.0%
D	11.1%	10.5%	15.7%
E	6.0%	6.2%	9.8%
F	2.1%	3.0%	5.2%
G	0.7%	1.9%	3.5%
H	0.0%	0.2%	0.6%
TOTAL	**100%**	**100%**	**100%**

Homelessness

2.30 Statutory homelessness is a distinct concept from those who are rough sleeping and includes a much wider group of people. A 'main homelessness duty' is owed where the authority is satisfied that the applicant is eligible for assistance, unintentionally homeless and falls within a specified priority need group.

2.31 The 'priority need groups' include households with dependent children or a pregnant woman and people who are vulnerable in some way e.g. because of mental illness or physical disability and was extended in 2002 to include anyone:

- Aged 16 or 17;
- Aged 18 to 20 who were previously in care;
- Vulnerable as a result of time spent in care, in custody, or in HM forces;
- Vulnerable as a result of having to flee their home because of violence or the threat of violence.

2.32 Where a main duty is owed, the authority must ensure that suitable accommodation is available for the applicant and his or her household.

2.33 Department of Levelling up Housing and Communities (DLUHC) statistics on homeless show a total of 1,232 people were assessed in relation to potentially being homeless in Cumberland in 2022-23, and 1,227 were found to be owed a duty of care.

2.34 Figure 23 shows the reasons that each of the 1,227 were made homeless. The largest reason is that friends and family were no longer willing to accommodate them (313), but for 167 of the households it was because of domestic abuse, and 260 were due to the end of a private rented tenancy.

Figure 23: Reason for Homelessness for Persons Owed a Duty of Care 2023 (Source: DLUHC Local Authority Level Statutory Homelessness Statistics)

	Number of Cases
Family or friends no longer willing or able to accommodate	313
End of private rented tenancy - assured shorthold	260
Domestic abuse	167
Non-violent relationship breakdown with partner	165
End of social rented tenancy	61
Eviction from supported housing	34
End of private rented tenancy - not assured shorthold	54
Other violence or harassment	17
Left institution with no accommodation available	58
Required to leave accommodation provided by Home Office as asylum support	0
Other reasons / not known	98
TOTAL	**1,227**

2.35 Figure 24 shows that the use of temporary accommodation was 40 dwellings in 2024 in Cumberland, which represents quite a low percentage of the housing stock as around 0.03% of the housing stock. The England average is around 0.45% of the entire dwelling stock being used as temporary accommodation.

Figure 24: Use of Temporary Accommodation in 2024 (Source: DLUHC Local Authority Level Statutory Homelessness Statistics and 2021 Census)

	Total number		
	Cumberland	North West	England
2024			
Currently in temporary accommodation in communal establishments (Bed and breakfast or Hostels)	8	2,790	24,020
Currently in temporary accommodation in market housing (Private sector leased or Private landlord)	1	3,900	65,340
Currently in temporary accommodation in affordable housing (Local Authority or RSL stock)	31	1,180	28,090
TOTAL	**40**	**7,870**	**117,450**

Vacant Properties

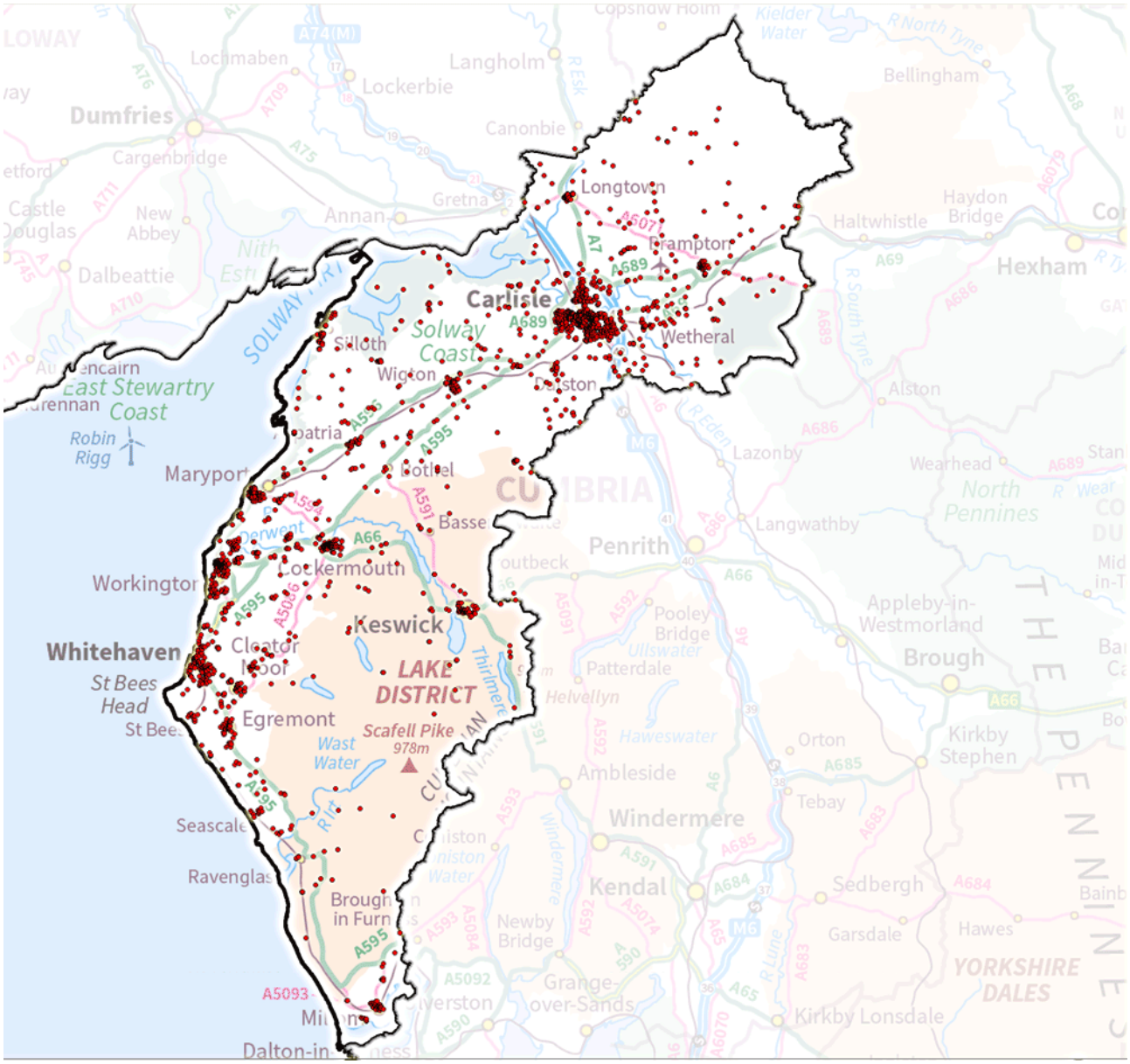
2.36 For much of England, the 2021 Census saw a rise in the dwelling vacancy rate, in part due to some student households not being at their term-time addresses, and also in part because the number of short-term lets through websites such as Airbnb has risen in recent years. However, the vacancy rate in Cumberland was 6.9%, well above the national average.

Figure 25: Percentage of Dwellings Vacant 2021 (Source: UK Census of Population)

	Percentage of Households		
	Cumberland	North West	England
TOTAL	6.9%	5.7%	5.4%

2.37 Figure 26 shows the distribution of long-term empty homes from the Council tax record. Currently homes which are empty while they undergo repairs are entitled to a discount in Cumberland, but any unfurnished property left empty for more than a year is subject to an additional 100% surcharge on its Council Tax. The pattern of empty homes in Cumberland shows a similar pattern to second homes, but they are different properties which qualify for different Council Tax categories.

Figure 26: Long-term Empty Homes in 2024 (Source: Council Tax Records)



Chapter Summary

2.38 When we consider how the tenure of properties has changed across time, affordable rented properties have decreased whilst owner occupied, and private rented properties have increased.

2.39 There was an overall increase in all types of properties from the 2011 Census to the 2021 Census, except for terraced houses, with the largest increase being in detached houses, followed by semi-detached. The decline in terraced housing is consistent with a growth in converted flats.

2.40 A quarter of the total stock was built before 1900. There is a significantly higher vacancy rate in Cumberland than the national average and this has grown since 2011. Some of this growth is likely to be due to a growth in holiday homes.

3. Population Profile

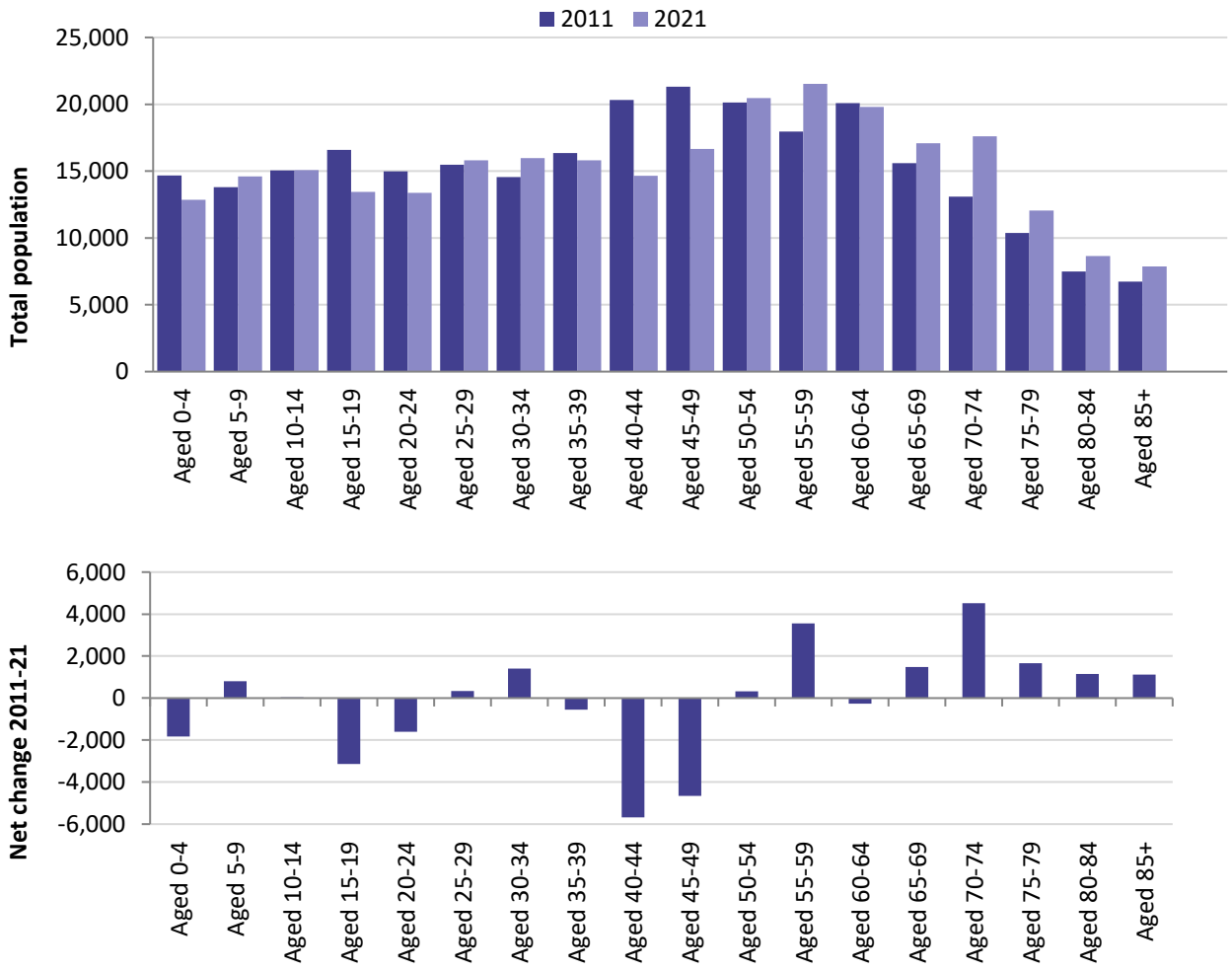
The Population of Cumberland

Population Age Profile

3.1 Figure 27 shows how the age profile of Cumberland has changed between the 2011 and 2021 Censuses. Along with almost every local authority in England, the population of Cumberland is becoming older on average. The total population fell by 1,295 persons and in the context of this wider decline, there was a growth of 9,939 in the population aged over 65 years.

3.2 This has long-term implications for housing in the form of the need to adapt more homes and also to deliver more dedicated older person housing.

Figure 27: Population Change 2011-21 by 5-year age cohort for Cumberland (Source: UK Census of Population)



3.3 Figure 28 shows how the age of the population varies by tenure. To understand the table, consider the example of the population aged 0-4 years, 3.8% of those living in owner occupied properties, 7.3% of those in private rent and 7.1% of those in affordable rented housing are aged 0-4 years. Therefore, the higher the percentage, the greater the share of a housing sector is occupied by that age cohort. Furthermore, the table also shows that 4.8% of the total household population are under 5 years also.

3.4 The data in Figure 28 shows that the affordable rented sector has the highest proportion of children, while the proportion of children in owner occupation is much lower. The population aged 20-44 years are much more concentrated in the private rented sector, while people aged 50 years and above are more likely to be in owner occupation.

Figure 28: Age of Population in Cumberland by Tenure 2021 (Source: UK Census of Population)

	Percentage of Persons by Age by Tenure			
	Owner Occupied	Private Rented	Affordable Rented Housing	Total
Aged 0-4	3.8%	7.3%	7.1%	4.8%
Aged 5-9	4.5%	6.7%	8.3%	5.4%
Aged 10-14	4.9%	6.0%	8.0%	5.6%
Aged 15-19	4.6%	4.9%	6.3%	4.9%
Aged 20-24	4.0%	8.9%	5.4%	4.9%
Aged 25-29	4.8%	11.0%	6.3%	5.8%
Aged 30-34	4.9%	9.7%	6.9%	5.9%
Aged 35-39	5.3%	8.0%	6.4%	5.8%
Aged 40-44	5.2%	6.5%	5.2%	5.4%
Aged 45-49	6.4%	5.7%	5.4%	6.1%
Aged 50-54	8.0%	6.0%	6.4%	7.5%
Aged 55-59	8.8%	5.4%	6.2%	7.9%
Aged 60-64	8.3%	4.0%	5.4%	7.3%
Aged 65-69	7.3%	3.0%	4.5%	6.3%
Aged 70-74	7.6%	2.7%	4.5%	6.5%
Aged 75-79	5.1%	1.8%	3.1%	4.4%
Aged 80-84	3.6%	1.2%	2.3%	3.1%
Aged 85+	2.9%	1.2%	2.2%	2.6%
TOTAL	**100%**	**100%**	**100%**	**100%**

Health

3.5 The overall health (in terms of the proportion of the population with limiting long term illnesses) of Cumberland is worse than the wider North West and England as a whole, with a key driving factor being the age of the population.

Figure 29: Percentage of Population with Limiting Long-term Illness (Source: UK Census of Population)

	Percentage of Population		
	Cumberland	North West	England
TOTAL	19.8%	19.4%	17.3%

3.6 In Cumberland, limiting long-term illness is highest in the affordable rented sector, with 32.3% of those in affordable rented having a limiting long-term illness. This is similar to the North West average for this group.

Figure 30: Limiting Long-term Illness in Cumberland by Tenure 2021 (Source: UK Census of Population)

	Percentage of households with at least one member with a limiting long-term illness			
	Owner Occupied	Private Rented	Affordable Rented Housing	Total
Cumberland	16.6%	18.5%	32.3%	19.4%
North West	16.2%	16.8%	32.1%	19.0%
England	14.9%	13.4%	28.6%	16.9%

The Link Between Health and Housing

3.7 Recent major news stories such as the Grenfell fire disaster and deaths which were assigned to the impact of mould in the household[4] have placed increasing focus upon the impact of housing on health.

3.8 In October 2022, the House of Commons Library produced a briefing note covering the links between health and housing ahead of a parliamentary debate on the issue[5]. This noted that:

> *''The causal link between poor housing conditions and poor health outcomes is long established.''*
>
> *''Poor-quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, cold, mould, noise) is strongly associated with poor health, both physical and mental.*
>
> *The longer the exposure to poor conditions, including cold, the greater the impact on mental and physical health. Specific physical effects are morbidity including respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality.*
>
> *In terms of mental health impacts, living in non-decent, cold or overcrowded housing and in unaffordable housing has been associated with increased stress and a reduction in a sense of empowerment and control over one's life and with depression and anxiety. Children living in overcrowded homes are more likely to be stressed, anxious and depressed, have poorer physical health, attain less well at school and have a greater risk of behavioural problems than those in uncrowded homes.''*

[4] Awaab's Law: Damp and mould complaints surge as action promised following toddler's death - Manchester Evening News
[5] The role of homes and buildings in levelling up health and wellbeing - House of Commons Library (parliament.uk)

3.9 Health and housing is a key part of the Levelling-up White Paper published in February 2022, which is expected to pass into legislation soon. This includes the government's current plans to address the problem of poor housing and includes plans to review the Decent Homes Standard (see Chapter 7) to ensure that it is fit for purpose and seeks to reduce the level of non-decent homes in the private rented sector by 2030.

3.10 The government also published The White Paper, "A Fairer Private Rented Sector" in June 2022, but its progress has stalled. If passed, this would require privately rented homes to meet the Decent Homes Standard for the first time.

Chapter Summary

3.11 The population of Cumberland is becoming older on average. The data shows that the affordable rented sector has the highest proportional share of children, while the share of children in owner occupation is much lower. The population aged 20-44 years are much more concentrated in the private rented sector, while people aged 50 years and above are more likely to be in owner occupation.

3.12 The health of the population is generally worse than the regional and national average.

4. Local Economy and Housing Market

Employment and Cost of Housing in Cumberland

Economic Activity

4.1 Figure 31 shows that the share of the population of Cumberland in employment is higher than the North West average. There is a significantly higher proportion of retired residents than the other averages. A high proportion of retirees also relates to Figure 32 which shows a high proportion of people claiming state pension.

Figure 31: Economic Activity for Those Aged 16 Years or More (Source: UK Census of Population)

	Area		
	Cumberland	North West	England
Economically Active			
In employment	55.0%	53.7%	55.7%
Unemployed	2.1%	2.8%	2.9%
Economically active student - employed	1.1%	1.7%	1.7%
Economically active student - unemployed	0.3%	0.6%	0.6%
Economically Inactive			
Retired	27.3%	22.2%	21.5%
Student	3.1%	5.6%	5.6%
Looking after family	3.6%	4.7%	4.8%
Long-term sick or disabled	4.9%	5.3%	4.1%
Other	2.7%	3.3%	3.1%
TOTAL	**100%**	**100%**	**100%**

Benefit Receipt

4.2 Figure 32 shows that households in receipt of housing benefit and/or Universal Credit in Cumberland is lower than the rate for England as a whole. The proportion in receipt of disability related benefits is higher in Cumberland, whilst state pension take-up is also higher.

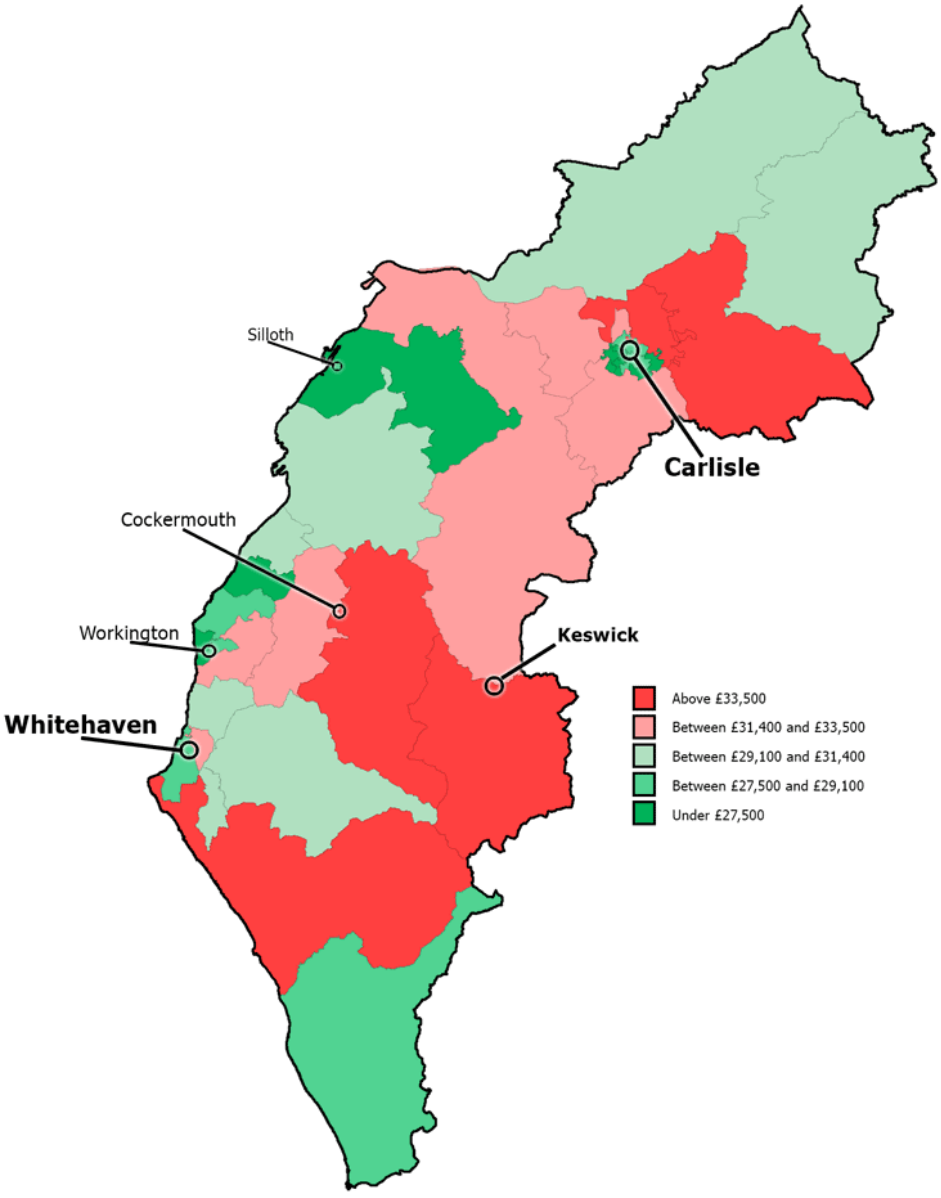
Figure 32: Benefit Take-up as Percentage of Population for Those Aged 16 Years or More (Source: DWP)

	Area		
	Cumberland	North West	England
Universal Credit/Housing benefit	9.7%	11.8%	10.7%
Disability related benefits	13.8%	13.7%	10.6%
State pension	26.7%	21.7%	21.6%

Income

4.3 An area where very little information is available for small areas is household income. The ONS do provide an estimate for average household incomes for Middle Super Output Areas (MSOAs), which are one of the building blocks for the Census and typically contain around 4,000-5,000 households. There are 26 of these areas covering Cumberland and the map below shows higher household incomes in rural areas around Carlisle, and in the National Park. However, some rural areas, including those around Silloth are in the lowest average income bracket.

Figure 33: Average Household income by MSOA in 2022 (Source: ONS)



Cost of Renting

4.4 Local Housing Allowance (LHA) is the maximum payment for private rented claimants in receipt of housing benefit based on Broad Rental Market Areas (BRMAs). The LHA was previously based on the 30th percentile private rent, however more recent increases have been based on CPI and rates were frozen in the July 2015 Budget before being increased in 2020. Rates were then frozen again, before being uplifted again in 2024.

4.5 Whilst BRMAs do not align with local authority boundaries, the Barrow in Furness, West Cumbria and North Cumbria BRMAs cover all of the area. However, the Barrow in Furness BRMA covers a very small area of Cumberland, so has been omitted from the table below. Figure 34 sets out the maximum local housing allowance by size of property in the BRMA in 2016 and 2024 and also shows the percentage rise in this time.

Figure 34: Maximum Local Housing Allowance thresholds 2016 & 2024 (Source: Valuation Office Agency)

Property type	2016 Weekly Rent £ North Cumbria BRMA	2016 Weekly Rent £ West Cumbria BRMA	2024 Weekly Rent £ North Cumbria BRMA	2024 Weekly Rent £ West Cumbria BRMA	Percentage Growth North Cumbria 2016-2024	Percentage Growth West Cumbria 2016-2024
Room only	£58.90	£63.25	£73.60	£73.60	25.0%	16.4%
1 bedroom	£80.55	£79.24	£90.90	£88.60	12.8%	11.8%
2 bedrooms	£94.36	£92.05	£109.32	£109.32	15.9%	18.8%
3 bedrooms	£112.77	£104.89	£135.78	£126.58	20.4%	20.7%
4+ bedrooms	£141.24	£134.02	£170.30	£161.10	20.6%	20.2%

4.6 Figure 35 sets out the weekly rents for different property sizes. This includes:

- Median and lower quartile private rent;
- Affordable rent (80% of median market rents); and
- Social rent based on existing average rents.

Figure 35: Weekly rent thresholds in Cumberland 2023 (Source: Private Rental Market Statistics, Valuation Office Agency; Regulator of Social Housing Statistical Data Returns. Note: Private rent data excludes housing benefit funded tenancies)

Weekly Rent (£)	Median Private Rent	Lower Quartile Private Rent	Affordable Rent	Social Rent
Cumberland				
1 bedroom	£99.19	£85.06	£84.23	£76.89
2 bedrooms	£115.23	£103.49	£96.96	£88.23
3 bedrooms	£142.17	£121.59	£107.99	£97.33
4+ bedrooms	£200.98	£157.05	£122.60	£107.13
North West				
1 bedroom	£126.49	£103.49	£95.13	£75.63
2 bedrooms	£149.49	£126.49	£110.54	£86.55
3 bedrooms	£172.48	£149.49	£120.08	£96.38
4+ bedrooms	£275.98	£201.23	£138.70	£105.60
England				
1 bedroom	£172.48	£132.24	£131.06	£87.79
2 bedrooms	£189.73	£149.49	£141.16	£100.43
3 bedrooms	£212.73	£169.03	£151.77	£111.00
4+ bedrooms	£356.47	£270.23	£192.00	£131.38

4.7 It is evident that for all property sizes, the median private rent is the highest followed in turn by the lower quartile private rent, affordable rent and target social rent. We would also note that rents in Cumberland are significantly lower than in England as a whole.

4.8 Figure 36 below compares the entry level lower quartile rents with the LHA rates and shows that all entry level rents are lower than their equivalent LHA rates. This implies that if a household is entirely dependent upon LHA to cover their rental costs, then they will be able to afford any property at the lower quartile rates in Cumberland.

Figure 36: Comparison of Lower Quartile Rents and LHA Rates (Source: Private Rental Market Statistics, Valuation Office Agency;)

Weekly Rent £	2023 Lower Quartile Private Rents	2024 Weekly Rent £ North Cumbria BRMA	2024 Weekly Rent £ West Cumbria BRMA
1 bedroom	£85.06	£90.90	£88.60
2 bedrooms	£103.49	£109.32	£109.32
3 bedrooms	£121.59	£135.78	£126.58
4+ bedrooms	£157.05	£170.30	£161.10

Chapter Summary

4.9 The share of the population of Cumberland in employment is slightly higher than the North West averages. The population who are retired is higher than the regional and national averages. This relates to benefit receipt, with a larger proportion of people in Cumberland claiming state pension.

4.10 The proportion of households in receipt of housing benefit or Universal Credit in Cumberland is lower than the rate for England. The receipt of disability related benefits is slightly higher in Cumberland than in England as a whole.

4.11 The cost of renting is relatively affordable in Cumberland, with private rents well below national averages and the LHA rates being currently sufficient to cover the cost of lower quartile rents.

5. Houses in Multiple Occupation

PRS Licensing Schemes

Houses in Multiple Occupation

5.1 Where three or more people in two or more households live in the same dwelling (for example, a group of adults sharing a house), this is considered to be a "House in Multiple Occupation" (HMO). Furthermore, a category of sub-divided dwellings (also classed under the broad umbrella term of HMO) known as S257 HMOs, as described below.

5.2 HMOs can be sub-divided into several broad groups depending on precisely how the property has been subdivided and the level of shared access to amenities, such as:

- A S257 building – Converted flats in a building where more than a third of the flats are privately rented, let on short-term tenancies, and the building conversion does not comply with 1991 (or later) building regulations.
- Shared houses – A dwelling that might otherwise be a family home being shared by a number (3 or more) of un-related adults.
- A Bedsit – A dwelling that has been converted for multiple occupation with individual rooms having some facilities of their own, and often a specified address (room number), but where there are still common parts and some shared amenities in the building.

5.3 The Housing Act 2004 defines HMOs containing 5 or more persons and at least 2 households as being mandatorily licensable anywhere in England. These properties do not require specific local licensing policies and for these HMOs there is an obligation on the landlord to apply to the local authority, where the HMO is located, for a licence. Local authorities, therefore, must be in a position to manage the application for licences. Local authorities can also introduce locally specific polices in the form of additional licensing, which encompasses a wider variety of HMO to include any which contain at least 2 households.

5.4 The Census 2021 identifies properties which it considers to be HMOs. However, the data identifies a total of 227 dwellings in total, which clearly is too low for Cumberland, particularly as 97 of these are flats. We have set out this data in Figure 37 below; but consider that it should be disregarded.

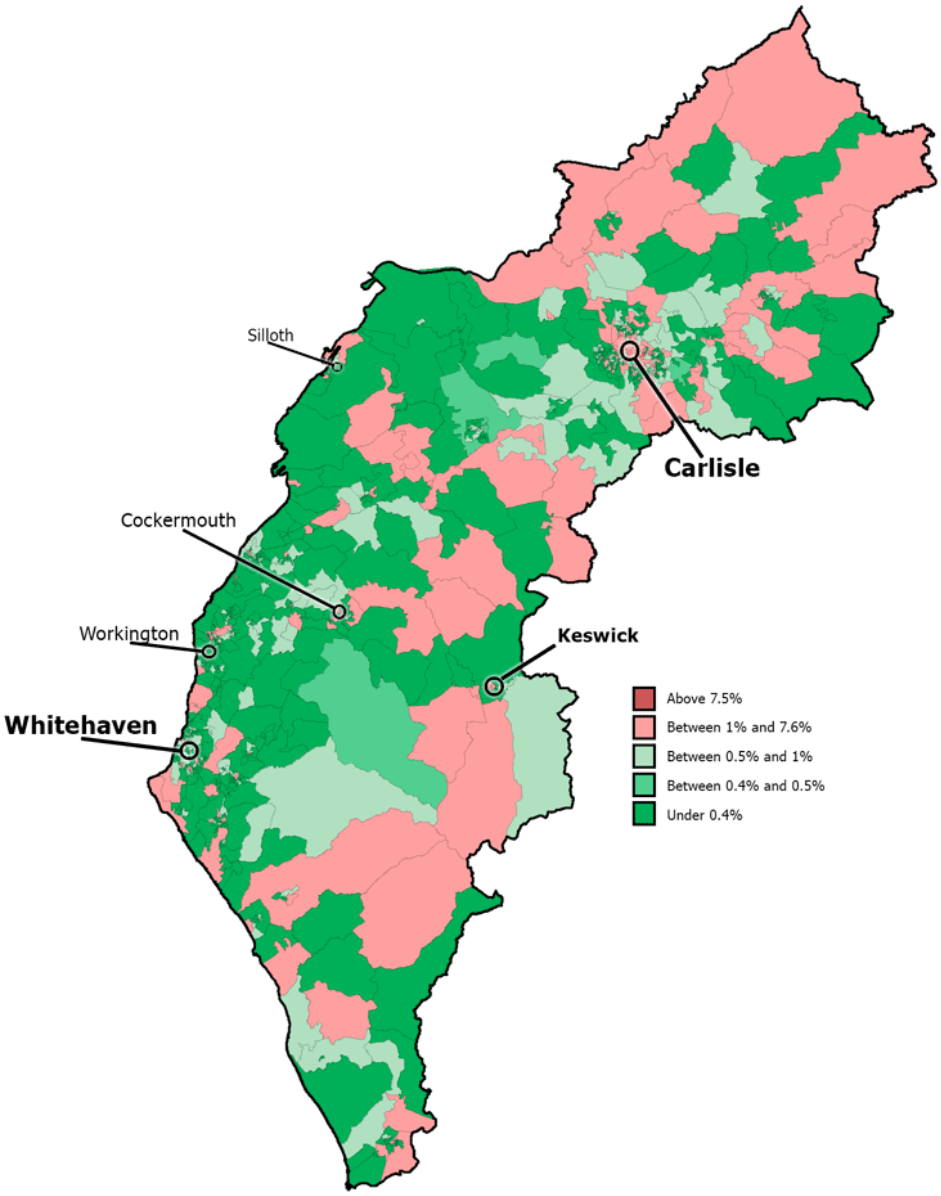
Figure 37: Number of Households in Cumberland by Property type 2021 (Source: UK Census of Population)

	Number of HMOs
Detached	9
Semi-detached	20
Terraced	101
Flat or maisonette	97
Caravan or other	0
TOTAL	**227**

5.5 The Census 2021 contains records of different household types in the private rented sector. One of these is the 'Other' household type. This covers groups such as all student households and a group of adults sharing a property but also a wider group of households such as multi-generational families who are sharing a property. In total, there were 2,424 such households in the private rented sector in Cumberland in 2021, which represents just over 2% of the total private sector dwelling stock.

5.6 Figure 38 shows the distribution of these properties containing Other Households in the private rented sector. There is clearly a concentration of such households in the centre of Carlisle, but beyond this, the majority of 'Other' households are to be found in rural areas, which are more likely to be associated with tenanted farmers and other groups who have housing tied to their work, rather than typical Section 254 HMOs. Therefore, the current licensable HMOs are likely to be a much smaller number than the 2,424 'Other' households.

Figure 38: Map of Other Households in the Private Rented Sector in Cumberland in 2021 (Source: UK Census of Population)

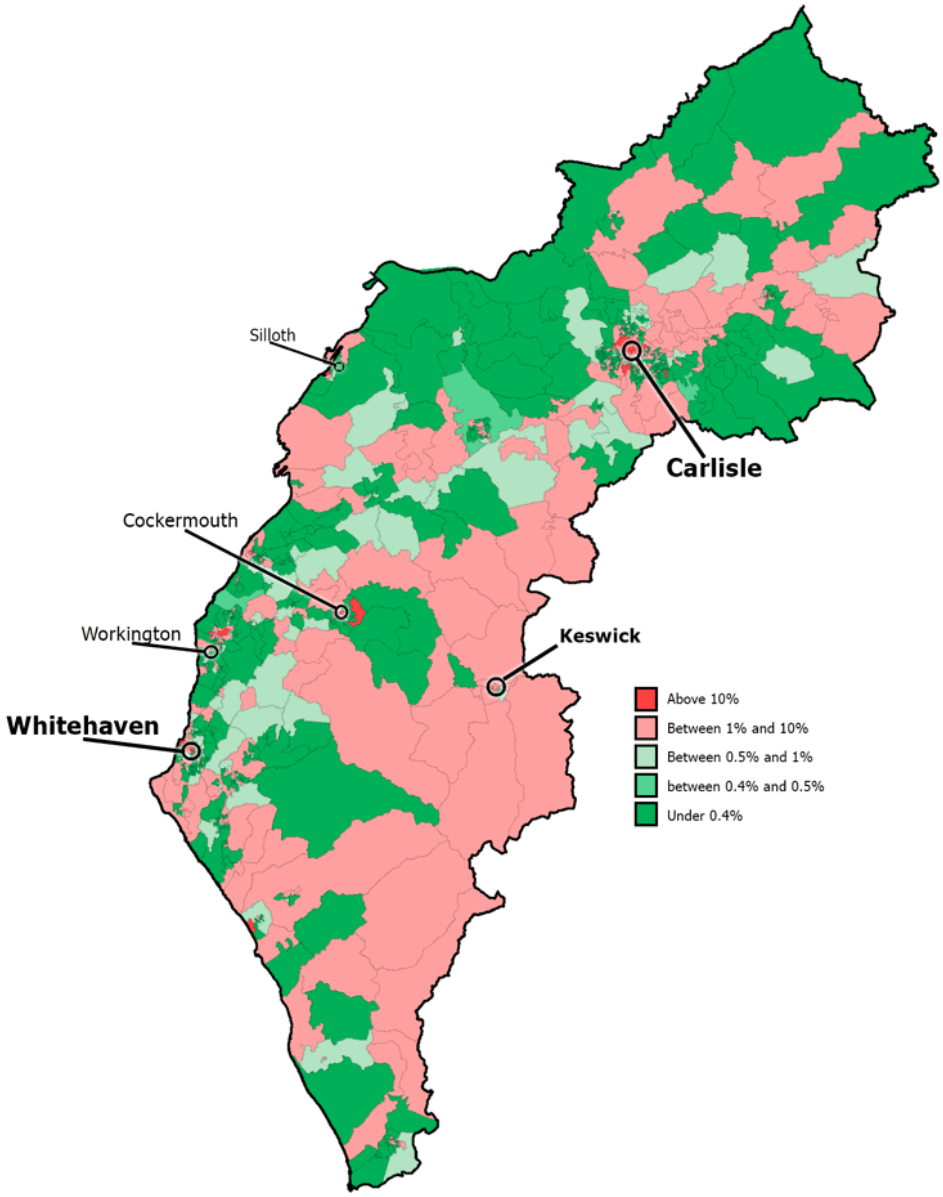


5.7 Figure 39 shows the distribution of student households, based upon records from Council tax discounts in 2024. Almost all are recorded as being the centre of Carlisle, around the University of Cumbria campus.

Figure 39: Student Households in Cumberland by Parish 2024 (Source: Council Records)

5.8 As set out in Figure 8, there has been a growth in terraced properties in Cumberland being converted to flats. Figure 40 shows the distribution of converted flats in 2021. The map shows a clear concentration of the housing stock in central Carlisle is formed from converted flats, but there are also areas of Workington, Whitehaven, Cockermouth and Keswick which have higher numbers for converted flats.

Figure 40: Converted Flats by Parish in 2021 (Source: UK Census of Population)



Chapter Summary

5.9 Over 2,000 households in Cumberland live in a single dwelling with a household type which either includes, only students, unrelated adults sharing, or multi-generation families. Around 340 of these households are all student households. Many of the remainder appear to live in rural areas and are likely to be multi-generation tenant farmers or other households whose housing is tied to their work.

5.10 There has been a growth in converted flats in Cumberland, with all urban areas showing areas with up to 10% of the stock being made up of converted flats.

6. Statutory Minimum Standards

The Housing Health and Safety Rating System (HHSRS)

Obligation to Tackle Housing Health and Safety Hazards

6.1 Tackling Health and Safety hazards in homes is an important issue both in terms of the quality of the housing stock but also in terms of the contribution this makes to Health and Wellbeing. The obligation to do so is set out in law.

6.2 From April 2006, Part 1 of the Housing Act 2004 repealed the former housing fitness standard and through statutory instruments and statutory guidance replaced it with the Housing Health and Safety Rating System.

6.3 The Act differentiates between Category 1 and Category 2 hazards. Local authorities have a duty to take 'the most appropriate course of action' in respect of any hazard scored under the HHSRS as Category 1. Authorities have discretionary power to take action with Category 2 hazards (which do not score past the threshold for Category 1). Further information on the HHSRS is given below.

Definition of Hazards under the HHSRS and Category Level

6.4 The Housing Health and Safety Rating System (HHSRS) is a prescribed method of assessing individual hazards, rather than a conventional standard to give a judgment of fit or unfit. The HHSRS is evidence based – national statistics on the health impacts of hazards encountered in the home are used as a basis for assessing individual hazards.

6.5 The HHSRS system deals with a much broader range of issues than the previous fitness standard. It covers a total of 29 hazards in four main groups:

- Physiological Requirements (e.g. damp & mould growth, excess cold, asbestos, carbon monoxide, radon, etc.);
- Psychological Requirements (crowding and space, entry by intruders, lighting, noise);
- Protection Against Infection (domestic hygiene, food safety, personal hygiene, water supply);
- Protection Against Accidents (e.g. falls on the level, on stairs and steps and between levels, electrics, fire, collision…).

6.6 The HHSRS scoring system combines the following elements:

- The probability that deficiency (i.e. A fault in a dwelling whether due to disrepair or a design fault) will lead to a harmful occurrence (e.g. An accident or illness);
- The spread of likely outcomes (i.e. The nature of the injury or illness);
- If an accident is very likely to occur and the outcome is likely to be extreme or severe (e.g. death or a major or fatal injury) then the score will be very high.

6.7 All dwellings contain certain aspects that can be perceived as potentially hazardous, such as staircases and steps, heating appliances, electrical installation, glass, combustible materials, etc. It is when disrepair or

inherent defective design makes an element of a dwelling significantly more likely to cause a harmful occurrence that it is scored under the HHSRS.

6.8 The HHSRS generates a numerical Hazard Score, and Hazard Bands have been devised as a simple means for handling the wide range of possible scores. There are ten Hazard Bands, with Band J being the safest, and Band A being the most dangerous:

- Hazard Bands A to C (i.e. Hazard Scores of 1,000 and above) are the most serious hazards, and these are known as **Category 1** (serious) hazards.
- Hazard Bands D to J (i.e. Hazard Scores below 1,000) are known as **Category 2** (other) hazards.

6.9 A local authority has a duty to deal with any Category 1 hazards found and has discretionary power to deal with Category 2 hazards. The HSCS focuses particularly on Category 1 hazards; but describes all hazards (including Category 2 hazards in Bands D and E) for comparative purposes. All of the main requirements facing local authorities have remained unchanged in the Housing and Planning Act 2016.

Current Category 1 Hazards in Cumberland

6.10 Until recently, the EHS was only published with outputs for England as a whole and for regions. No local authority level information was provided. The raw data from the EHS is available to use for modelling purposes, but this does not include any identifier for a property's location except for its wider region.

6.11 In June 2023, DLUHC (now MHCLG) published information from the 2019 EHS for English local authorities as experimental statistics. The data is based upon extrapolating outputs from the national survey to the local authority areas, so areas with older stock, worse energy performance scores, and more bungalows are modelled to have higher numbers of Category 1 hazards. Bungalows are typically older than the average stock of an area, so are more likely to experience excess cold or falls on the level. This data was then updated to the 2020 EHS in April 2024.

6.12 Figure 41 and Figure 42 compare the outputs for Cumberland with the North West and England as a whole by tenure and property type. It is important to note that the data does relate to 2020, the condition of the housing stock is improving over time, and also that it relates only to occupied dwellings, so vacant properties have not been considered.

6.13 The data shows that overall, Cumberland is estimated to have had 17.9% of its housing stock with Category 1 hazards in 2020, compared to 12.3% for the North West and 9.2% for England. The private rented stock is modelled to have the highest rate of Category 1 hazards, with terraced properties also scoring more highly.

6.14 To place this data in context, there are 296 local authorities in England, and Cumberland ranks 281st in this modelling exercise, so just on the brink of the bottom 5%. However, every local authority modelled to have a higher rate of Category 1 hazards than Cumberland are extremely rural and typically contains large areas of national park, so Cumberland is similar to comparable areas.

Figure 41: Percentage of Households with Category 1 Hazards by Tenure in 2020 (Source: EHS 2020 and DLUHC Modelling)

	Percentage with Category 1 Hazards		
	Cumberland	North West	England
Owner occupied	18.5%	12.6%	9.2%
Private rent	26.4%	17.0%	13.2%
Affordable Rented Housing	8.3%	6.6%	5.0%
TOTAL	**17.9%**	**12.3%**	**9.2%**

Figure 42: Percentage of Households with Category 1 Hazards by Property Type in 2020 (Source: EHS 2020 and DLUHC Modelling)

	Percentage with Category 1 Hazards		
	Cumberland	North West	England
Detached houses	14.4%	10.5%	9.1%
Semi-detached houses	12.2%	11.7%	8.7%
Bungalows	16.3%	9.0%	8.3%
Terraced houses	24.1%	5.9%	11.0%
Flats	19.6%	8.5%	8.0%
TOTAL	**17.9%**	**12.3%**	**9.2%**

6.15 The DLUHC data only shows local authorities, but the same process can then be applied to areas such as parishes within a local authority. For Category 1 hazards, ORS have developed our own model, which has been applied with a base date of 2023. This is not the same model used by DLUHC (now MHCLG) in their 2020 data, but it produces very similar results. The key factors in assessing the level of Category 1 hazards in each parish were, the age of the dwelling stock, the range of SAP scores derived from Energy Performance Certificates as set out in Chapter 8, the tenure mix and the range of property types.

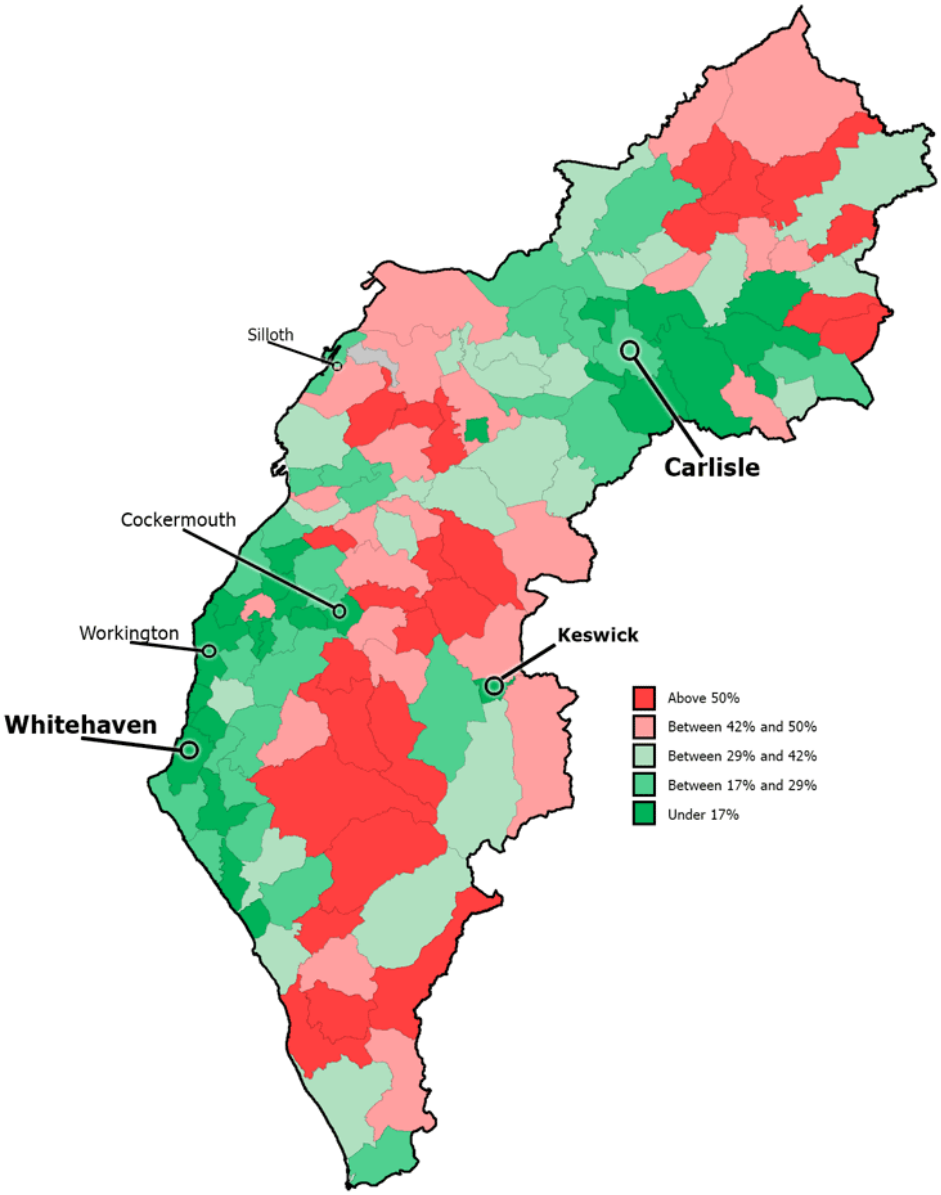
6.16 Figure 43 shows the modelled percentage of private sector dwellings which have Category 1 hazards in 2023. In total, the model gives 18.9% of all owner occupied dwellings and 23.1% of all private rented dwellings as having a Category 1 hazard. Overall, this equates to around 17,500 owner occupied and 4,000 private rented properties which contain a Category 1 hazard. We would note that these figures have been rounded to prevent any over-precision.

6.17 Almost all of the larger urban areas have less than 17% of the stock modelled as containing a Category 1 hazard, while for many rural areas, the level of non-decent stock is over 50%. Particularly, the Lake District National Park, the area to the north of Carlisle and the area around Silloth are modelled to show very high levels of non-decent homes.

6.18 We would note that the risk of flooding is not considered by the EHS as a separate hazard, but Cumberland has seen significant recent flooding. In December 2015 a total 7,465 properties were flooded, which is over 5% of the total dwelling stock.[6]

[6] Floods 2015 Impact Assessment

Figure 43: Percentage of Private Sector Households with Category 1 Hazards by Parish in 2023 (Source: ORS Modelling)



6.19 As noted earlier, the HHSRS system contains a total of 29 hazards, many of which are extremely rare. It is also the case that in many properties more than one hazard will be present. Until around 10 years ago, the English Housing Survey dataset contained a set of variables which allowed for the identification of key hazards, but this calculation has now been removed from the public data. It is now the case that only a small number of hazards are published as part of the reporting process. For example, in 2020 the English Housing Survey found that 2.8% of properties suffered from excess cold, with 3% of owner occupied and 4% of private rent properties. Meanwhile, 3% of properties suffered from damp, with around 11% of all private rented properties affected. However, very few properties are considered to suffer from a Category 1 hazard from damp and mould, with most seeing the presence of damp being noted, but not recorded as a hazard.

6.20 The most common hazards found in properties are falls on the stairs, excess cold and falls on the level, and as set out above, the share of properties experiencing Category 1 hazards in Cumberland is well above the number for England as a whole.

6.21 It is possible to consider excess cold separately because it can be identified through publicly available Energy Performance Certificate (EPC) data. The data below is for 2023, rather than 2020, so the national situation has improved in the intervening three years. England has an average of 1.9% of properties with excess cold, while Cumberland's average is 6.4% for owner occupied and 5.4% for private rented with a higher rate in detached properties (Figure 44 and

	Percentage with Excess Cold	
	Cumberland	England
Owner occupied	6.4%	3%
Private rent	5.4%	1%
TOTAL	**6.2%**	**1.9%**

6.23 Figure 45). This is around 6,100 owner occupied and 1,100 private rented properties in total.

Figure 44: Percentage of Households with Excess Cold by Tenure (Source: EPC Register and ORS Modelling)

	Percentage with Excess Cold	
	Cumberland	England
Owner occupied	6.4%	3%
Private rent	5.4%	1%
TOTAL	**6.2%**	**1.9%**

Figure 45: Percentage of Households with Excess Cold by Property Type (Source: EPC Register and ORS Modelling)

	Cumberland
Detached houses	11.9%
Semi-detached houses	4.1%
Terraced houses	4.4%
Flats	1.8%
Caravan or other	6.5%
TOTAL	**6.2%**

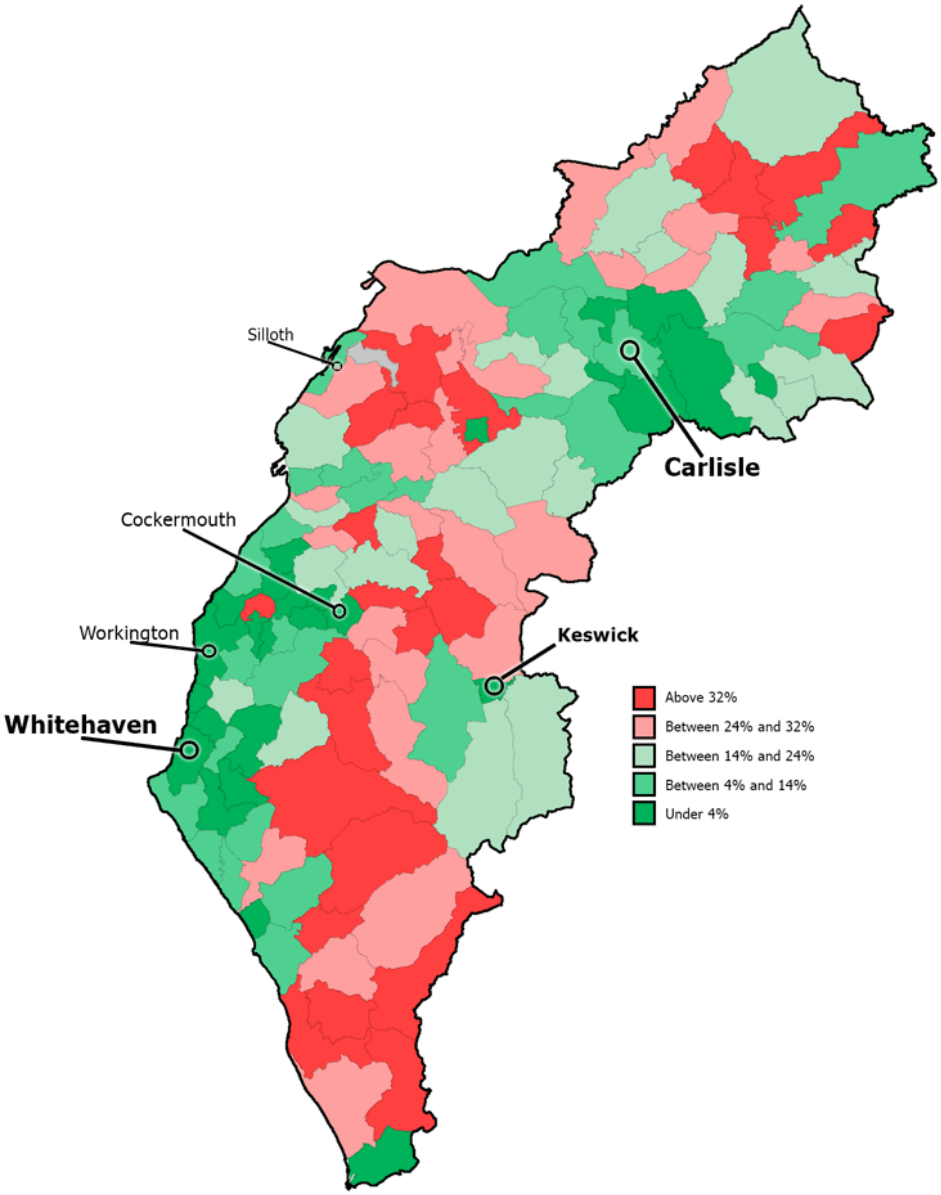
6.24 Unsurprisingly, there is a clear correlation between the age of properties and the percentage with excess cold. A significantly higher percentage of older properties contain the hazard, and the percentage increases the older the properties are (Figure 46). In practice, properties built before 1900 form around 75% of all of those with excess cold in Cumberland

Figure 46: Percentage of Private Households with Excess Cold by age of property (Source: EPC Register and ORS Modelling)

	Percentage with Excess Cold
	Cumberland
Pre 1900	19.4%
1900-1949	6.8%
1950-1975	3.7%
1976-1990	1.5%
1991-2002	0.8%
2003-2011	0.0%
2012 onwards	0.0%
TOTAL	**6.2%**

6.25 It is also possible to analyse excess cold at parish level (Figure 47). This shows that for large areas of Cumberland, more than a quarter of the private sector dwelling stock is modelled to experience excess cold, with many areas having more than a third of the stock experiencing excess cold.

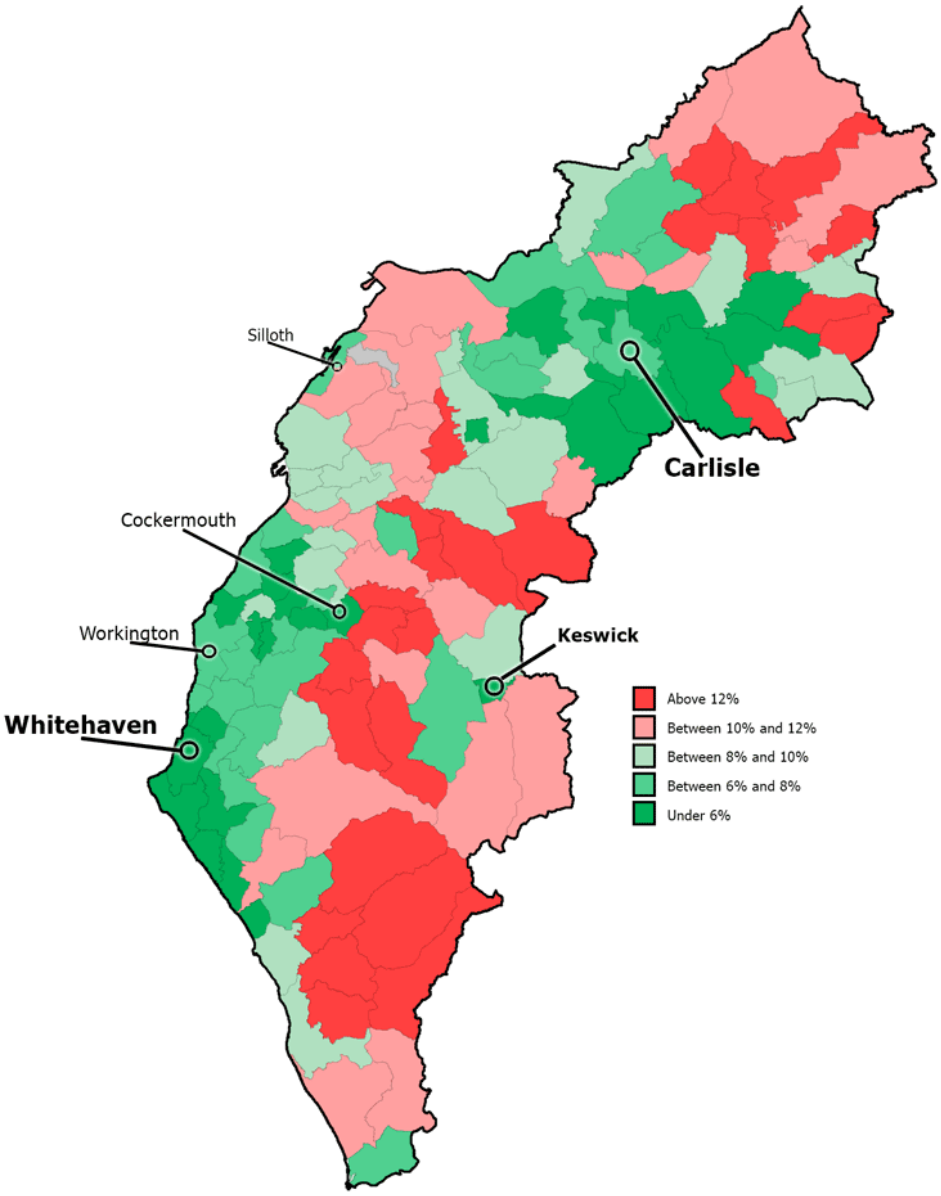
Figure 47: Number and Percentage of Private Sector Households with Excess Cold by Parish in 2023 (Source: EPC Register and ORS Modelling.)



6.26 Modelling can also consider the impact of damp. In the most recent EHS data, around 4% of all properties experience damp, but in very few of these would it form a Category 1 hazard. However, the modelling for Cumberland shows an average of 5.4% for owner occupied and 8.0% for the private rented sector. This is around 5,100 owner occupied properties and 1,400 private rented dwellings with damp.

6.27 Figure 48 shows that the distribution of damp is very similar to excess cold and there will be a very high overlap between the two issues.

Figure 48: Number and Percentage of Private Sector Households with Damp by Parish in 2023 (Source: ORS Modelling.)



Chapter Summary

6.28 Data from the EHS 2020 shows that Cumberland is estimated to have had 17.9% of its housing stock with Category 1 hazards in 2020, compared to 12.3% for the North West and 9.2% for England. The private rented stock is modelled to have the highest rate of Category 1 hazards, with terraced properties also scoring more highly.

6.29 Further modelling to 2023 shows that 18.9% of all owner occupied dwellings and 23.1% of all private rented dwellings having a Category 1 hazard. Overall, this equates to around 17,500 owner occupied and 4,000 private rented properties which contain a Category 1 hazard.

6.30 England has an average of 1.9% of properties with excess cold, while Cumberland's average is 6.4% for owner occupied and 5.4% for private rented. This is around 6,100 owner occupied and 1,100 private rented properties in total.

6.31 In the most recent EHS data, around 4% of all properties experience damp. However, the modelling for Cumberland shows an average of 5.4% for owner occupied and 8.0% for the private rented sector. This is around 5,100 owner occupied properties and 1,400 private rented dwellings with damp.

7. The Decent Homes Standard

Measuring Housing Condition against the Standard

Obligation to Tackle Housing Health and Safety Hazards

7.1 The Decent Homes Standard is a broad measure of housing condition which was introduced to ensure all public sector housing met a minimum standard by 2010. The percentage of vulnerable households in decent homes in the private sector has also been a focus for Government; whilst local authority targets were withdrawn following the Comprehensive Spending Review in 2007, the percentage has remained part of MHCLG's own Departmental Strategic Objectives (DSO2, 2.8).

7.2 Aside from governmental obligations and measures, the Decent Homes Standard has become the norm for measuring housing conditions, particularly in the social housing sector. It is less commonly used in private sector housing, but we have analysed the levels of non-decent homes for this study.

Introducing the Decent Homes Standard

7.3 To meet the Standard, a dwelling must achieve <u>all</u> four of the following criteria:

Figure 49: Categories for dwelling decency

A	It meets the current statutory minimum standard for housing: At present, this means that it should not have a Category 1 hazard under the HHSRS
B	It is in a reasonable state of repair – has to have no old and defective major elements
C	It has reasonably modern facilities and services: Adequate bathroom, kitchen, common areas of flats and is not subject to undue noise
D	Provides a reasonable degree of thermal comfort – has effective insulation and efficient heating

7.4 A detailed definition of the criteria and their sub-categories are described in the Office of the Deputy Prime Minister (ODPM) guidance: "*A Decent Home – The definition and guidance for implementation*" June 2006.

7.5 If a dwelling was to fail any one of these criteria, it would be considered "non-decent". The term 'non-decent' can be seen as derogative. However, a non-decent dwelling need not be in a terrible state of repair or in an appalling condition; something as simple as inefficient heating and a lack of insulation can cause a dwelling in otherwise pristine condition to be classified as non-decent.

7.6 The Decent Homes Standard is a relatively low one, so failure to meet it should be regarded as a trigger for action. In some cases, however, it may not be practical to make a dwelling decent and it may also not be in the best interests of the occupiers to do so. The guidance on recording outcomes recognises that there may be instances where it is appropriate to record cases, for example, where work to achieve only partial compliance with the standard has been achieved, or where non-compliance results from the occupier refusing to have work carried out.

7.7 It is possible for a dwelling to fail the Decent Homes Standard for more than one reason: for example, there is often a strong overlap between Category 1 hazards and thermal comfort failures. As a consequence, the number of fails in total will be more than the number of dwellings which fail because some dwellings have more than one fail.

Applying the Standard

7.8 The four criteria used to determine the decent homes standard have specific parameters. The variables used for the criteria are described below.

Criterion A: Current Minimum Standards for Housing – Category 1 Hazards identified under the Housing Health and Safety Rating System (HHSRS)

7.9 Criterion A is simply determined as whether or not a dwelling fails the current minimum standard for housing. This is now the Housing Health and Safety Rating System (HHSRS) – specifically Category 1 hazards as set out in the previous chapter.

Criterion B: Dwelling State of Repair – Disrepair to major building elements and amenities

7.10 Criterion B of the Decent Homes Standard looks at the issue of the state of general repair of a dwelling which will fail if it meets one or more of the following:

- One or more key building components are old (which are specifically defined in the criteria) 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 replacing or major repair.

7.11 A building that has component failure before the components' expected lifespan does not fail the Decent Homes Standard. A dwelling will be considered to be in disrepair if it fails on one or more major element or two or more minor elements.

Criterion C: Lacking Modern Facilities – Provision of kitchens, bathrooms and other amenities

7.12 The third criterion of the Decent Homes Standard is that a dwelling should have adequate modern facilities. A dwelling fails the modern facilities test only if it lacks three or more of the following:

- A kitchen which is 20 years old or less;
- A kitchen with adequate space and layout;
- A bathroom that is 30 years old or less;
- An appropriately located bathroom and WC;
- Adequate noise insulation;
- Adequate size and layout of common parts of flats.

7.13 For example, if a dwelling had a kitchen and bathroom older than the specified date, it would only fail the modern facilities test if it also failed another of the identified criteria (e.g. the kitchen had a poor layout, or the bathroom was not properly located).

7.14 It may be noted that the age definition for kitchens and bathrooms differs from Criterion B. This is because it was determined that a decent kitchen, for example, should generally be less than 20 years old but may have the odd item older than this. The same idea applies for bathrooms.

Criterion D: Thermal Comfort Failures – Provision of efficient heating and effective insulation

7.15 The dwelling should provide an adequate degree of thermal comfort. Originally this definition was based on the Standard Assessment procedure (SAP) rating of a dwelling, but a number of local authorities criticized this approach, as it requires a fully calculated SAP for each dwelling that is being examined. Whilst this is fine for a general statistical approach, such as this study, it does cause problems at the individual dwelling level for determining an appropriate course of action.

7.16 The alternative, laid out in the current guidance, is to examine a dwelling's heating systems and insulation types. The revised definition requires a dwelling to have both:

- Efficient heating; and
- Effective insulation.

7.17 Efficient heating is defined as any gas or oil programmable central heating or electric storage heaters or programmable LPG/solid fuel central heating or similarly efficient heating systems, which are developed in the future. Due to the differences in efficiency between gas/oil heating systems and other heating systems listed, the level of insulation that is appropriate also differs:

- For dwellings with gas/oil programmable heating: at least 50mm loft insulation (if there is loft space) is an effective package of insulation or cavity wall insulation (if there are cavity walls that can be insulated effectively);
- For dwellings heated by electric storage radiators/LPG/programmable solid fuel central heating a higher specification of insulation is required: at least 200mm of loft insulation (if there is a loft) and cavity wall insulation (if there are cavities that can be insulated effectively).

7.18 Any heating sources which provide less efficient options fail in terms of thermal comfort (e.g. all room heater systems are considered to fail the thermal comfort standard).

Prevalence of Non-Decency

7.19 As noted in the previous chapter, in June 2024, DLUHC published information from the 2020 EHS for English local authorities as experimental statistics. The data is based upon extrapolating outputs from the national survey to the local authority areas, so areas with older stock, more private rent, worse energy performance scores, and more bungalows are modelled to have higher numbers of non-decent homes.

7.20 Figure 50 and Figure 51 compare the outputs for Cumberland with the North West and England as a whole by tenure and property type. Again, we would note that the data does relate to 2020 and the condition of the housing stock is improving over time and also that it relates only to occupied dwellings, so vacant properties have not been considered.

7.21 The data shows that overall, Cumberland is estimated to have had 21.3% of its housing stock as non-decent in 2020, compared to 17.0% for the North West and 15.1% for England. The private rented stock is modelled to have the highest rate of non-decency, with terraced houses and flats scoring highest amongst property types.

7.22 Again, to place this data in context, there are 296 local authorities in England, and Cumberland ranks 270st in this modelling exercise, so it is in the bottom 10%. However, the bottom 10% of local authorities are typically extremely rural and contain large areas of national park, so Cumberland is again similar to comparable areas.

Figure 50: Percentage of Dwellings that are Non-Decent by Tenure in 2020 (Source: EHS 2020 and DLUHC Modelling)

	Percentage Non-decent		
	Cumberland	North West	England
Owner occupied	21.6%	16.6%	13.8%
Private rent	29.9%	24.1%	22.9%
Affordable Rented Housing	12.9%	11.3%	11.2%
TOTAL	**21.3%**	**17.0%**	**15.1%**

Figure 51: Percentage of Dwellings that are Non-Decent by Property Type in 2020 (Source: EHS 2020 and DLUHC Modelling)

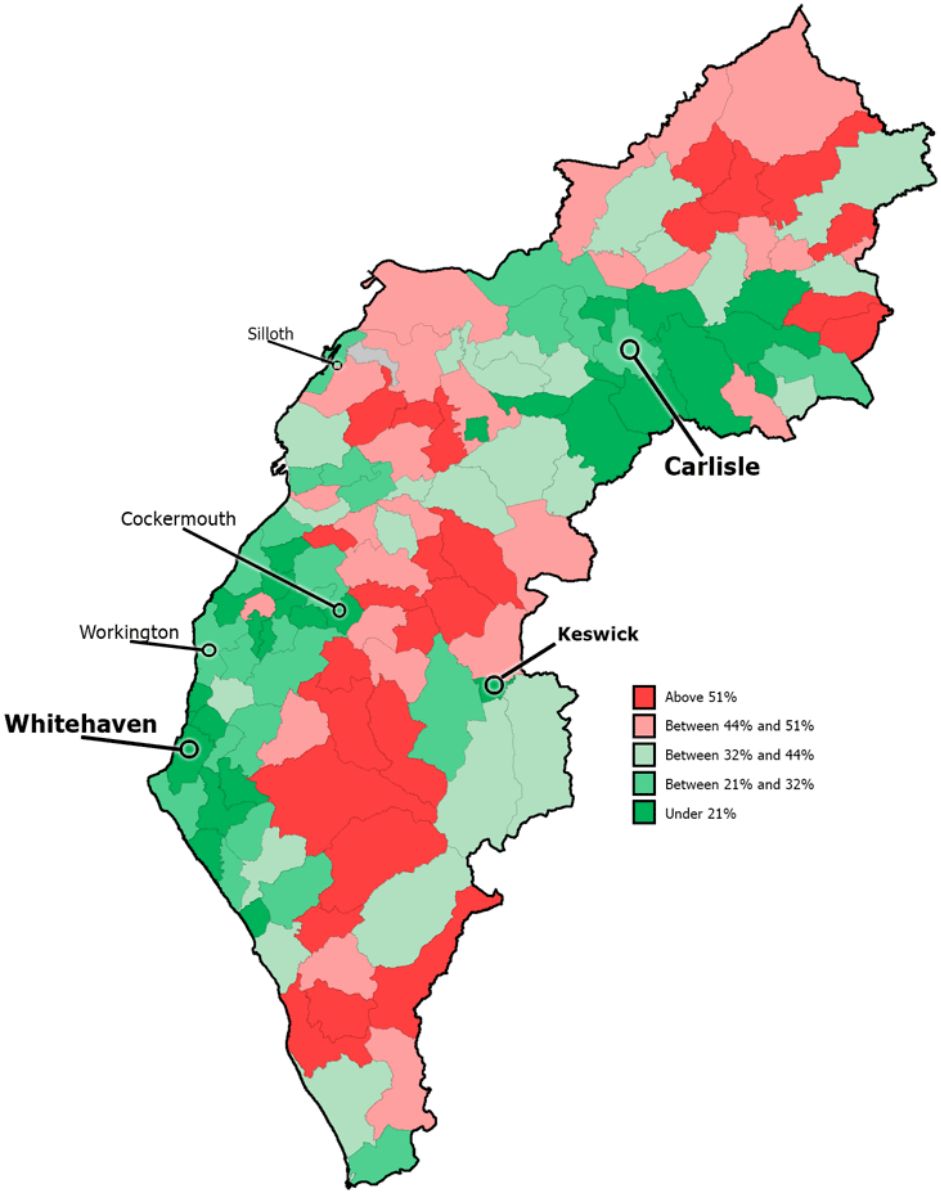
	Percentage Non-decent		
	Cumberland	North West	England
Detached houses	15.8%	8.8%	11.2%
Semi-detached houses	16.5%	7.8%	13.6%
Bungalows	21.1%	6.4%	13.2%
Terraced houses	27.2%	4.5%	16.3%
Flats	23.6%	5.3%	18.1%
TOTAL	**21.3%**	**17.0%**	**15.1%**

7.23 As with Category 1 hazards, ORS have developed our own model for non-decent homes which has been applied for 2023. Figure 52 shows the modelled distribution of non-decent private sector dwellings in 2023 for each parish in Cumberland. This is not the same model used by MHCLG in their 2020 data, but it produces very similar results.

7.24 The modelled outputs show that 23.1% of owner occupied and 27.9% of private rented are non-decent. This is around 20,000 owner occupied and 5,000 private rented properties in 2023.

7.25 Almost all of the larger urban areas have less than 21% of the stock modelled as being non-decent, while for many rural areas, the level of non-decent stock is over 50%. Particularly, the Lake District National Park, the area to the north of Carlisle and the area around Silloth are modelled to show very high levels of non-decent homes.

Figure 52: Percentage of Private Sector Dwellings that are Non-Decent by Parish in 2023 (Source: ORS Modelling)



Chapter Summary

7.26 Data from the EHS 2020 shows that Cumberland is estimated to have had 21.3% of its housing stock as non-decent in 2020, compared to 17.0% for the North West and 15.1% for England. The private rented stock is modelled to have the highest rate of non-decency, with terraced houses and flats scoring highest amongst property types.

7.27 Updated modelled outputs show that 23.1% of owner occupied and 27.9% of private rented are non-decent. This is around 20,000 owner occupied and 5,000 private rented properties in 2023.

8. Energy Performance and Fuel Poverty

Energy and fuel use

Energy Performance and SAP Ratings

8.1 The Standard Assessment Procedure or SAP is a government rating for energy efficiency. It is used in this report in conjunction with annual CO2 emissions figures, calculated on fuel consumption, and the measure of that fuel consumption in kilo Watt hours (kWh), to examine energy efficiency.

8.2 The Government's SAP rating has been changed a number of times over the years and these changes can have an important effect on comparing SAP ratings. The most significant changes came in 2001 and 2005, which involved a shift to a 1 to 120 scale in 2001 and then a reversion to a 1 to 100 scale in 2005.

8.3 The key methodology used for gathering SAP information is Energy Performance Certificates (EPCs). Every property in England requires an EPC to be conducted when it is bought and sold and also when it is being let. Social landlords must also maintain an up-to-date EPC for their properties. This means that around half of all properties in England have had an EPC conducted in the past 10 years. In Cumberland, we were able to analyse records for 63,907 different properties.

8.4 For Cumberland, we have utilised the most recent EPC for any property, so there is no double counting of multiple EPCs for any property which has been assessed more than once.

Main Heating

8.5 Figure 53 shows that across Cumberland, 92.3% of properties use central heating as their main heating source but many properties still do use storage or single room heaters which tend to be less energy efficient and more expensive. The England average is 92% of properties using central heating.

Figure 53: Main Heating System by Tenure in Cumberland (Source: EPC Register)

	Tenure			
	Owner occupied	Private rent	Affordable Rented Housing	Total
CUMBERLAND				
Central heating	92.6%	82.6%	96.2%	92.3%
Storage heaters	4.0%	9.1%	3.2%	4.2%
Single room heaters	3.4%	8.3%	0.6%	3.5%
ENGLAND				
Central heating	94.9%	81.6%	92.4%	92.0%
Storage heaters	3.2%	11.0%	6.3%	5.1%
Single room heaters	1.9%	7.4%	1.4%	2.8%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**

8.6 In terms of heating systems by the age of properties (Figure 54), properties that were built Pre 1900 have the lowest proportion of central heating.

Figure 54: Main Heating System by Property Age in Cumberland (Source: EPC Register)

	Property Age						
	Pre 1900	1900-1949	1950-1975	1976-1990	1991-2002	2003-2011	2012 onwards
Central heating	84.9%	92.5%	95.4%	90.0%	90.2%	92.9%	98.6%
Storage heaters	8.0%	3.6%	3.0%	7.4%	6.5%	1.2%	0.0%
Single room heaters	7.1%	3.9%	1.6%	2.5%	3.3%	5.9%	1.3%
TOTAL	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

8.7 Figure 55 shows heating system by property type and indicates that over 92% of houses in Cumberland run using central heating. However, less than three quarters of flats use central heating, with a correspondingly larger proportion heated by single room heaters and storage heaters.

Figure 55: Main Heating System by Property Type in Cumberland (Source: EPC Register)

	Property type					
	Detached	Semi-detached	Terraced	Flat or maisonette	Caravan or other	Total
Central heating	93.9%	95.4%	93.5%	72.8%	37.3%	92.3%
Storage heaters	3.5%	2.8%	3.3%	14.5%	4.0%	4.2%
Single room heaters	2.6%	1.8%	3.2%	12.7%	58.7%	3.5%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

8.8 In general, the heating systems of most properties in Cumberland are considered to be fairly good. However, around 13% of those in the private rent sector are considered to be of very or fairly poor quality (Figure 56):

Figure 56: Quality of Heating System by Tenure in Cumberland (Source: EPC Register)

Quality of Heating System	Tenure			
	Owner occupied	Private rent	Affordable Rented Housing	Total
Very Good	0.2%	0.0%	0.7%	0.4%
Fairly Good	78.2%	69.6%	93.2%	80.5%
Average	13.1%	17.7%	4.6%	11.5%
Fairly Poor	5.0%	4.1%	0.7%	3.9%
Very Poor	3.5%	8.5%	0.6%	3.8%
TOTAL	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Loft Insulation

8.9 Installing loft installation of at least 200mm can achieve energy efficiency gains quickly and relatively cheaply. Figure 57 shows the proportion of properties in Cumberland with 200mm or more loft insulation by the age of property. There is a notable lack of insulation on properties that were built prior to 1950.

Figure 57: Loft Insulation Where the Property Contains a Loft by Age of Property in Cumberland (Source: EPC Register)

	Percentage of dwellings with 200mm or more loft insulation
Pre 1900	39.4%
1900-1949	49.8%
1950-1975	64.3%
1976-1990	63.2%
1991-2002	62.9%
2003-2011	81.9%
2012 onwards	97.4%

8.10 Figure 58 shows the proportion of properties in Cumberland with 200mm or more loft insulation by the tenure of property. Social rented properties are more likely to have 200mm or more loft insulation than other tenures.

Figure 58: Loft Insulation Where the Property Contains a Loft by Tenure of Property in Cumberland (Source: EPC Register)

	Percentage of dwellings with 200mm or more loft insulation
Owned	54.4%
Private Rent	51.0%
Social Rent	79.7%

8.11 Figure 59 shows the proportion of properties in Cumberland with 200mm or more loft insulation by property type. Detached houses have a higher prevalence of 200mm or more loft insulation than other types of property. We would note that the data for caravans is derived from a relatively small sample.

Figure 59: Loft Insulation Where the Property Contains a Loft by Type of Property in Cumberland (Source: EPC Register)

	Percentage of dwellings with 200mm or more loft insulation
Detached	73.1%
Semi-Detached	65.0%
Terraced	51.0%
Flat	63.1%
Caravan / Other	94.3%

Cavity Wall Insulation

8.12 Across the whole of England, 70% of properties which have cavity walls also contain insulation of those walls (Figure 60). Across Cumberland this figure is 77.6%; with the private rented sector having a higher prevalence than owner occupied properties.

Figure 60: Percentage Cavity Wall Insulation by Tenure in Cumberland and England (Source: EPC Register)

	Tenure			
	Owner occupied	Private rent	Affordable Rented Housing	Total
Cumberland	75.9%	77.1%	82.8%	77.6%
England	70.7%	60.7%	77.1%	70%

8.13 Insulation of solid wall properties is much rarer, with only 11% covered in England, and 13.7% of the solid wall properties in Cumberland have been insulated. Affordable rented solid wall properties have a much higher rate of coverage for insulation. Due to the nature of solid wall properties, insulation is much more difficult to implement.

Figure 61: Percentage Solid Wall Insulation by Tenure in Cumberland and England (Source: EPC Register)

	Tenure			
	Owner occupied	Private rent	Affordable Rented Housing	Total
Cumberland	10.7%	12.2%	52.3%	13.7%
England	8.5%	10.5%	27.3%	11%

Windows

8.14 Figure 62 shows that 91% of properties in Cumberland are fully double glazed, but only 83.2% of private rented properties are fully double glazed. When combining this with a similar pattern for heating systems, it may suggest that private rented properties are less efficiently heated and insulated. Affordable rented housing is close to 100% double glazed.

Figure 62: Double Glazing by Tenure in Cumberland (Source: EPC Register)

	Tenure			
	Owner occupied	Private rent	Affordable Rented Housing	Total
Fully double glazed	91.0%	83.2%	97.6%	91.0%
Partial double glazed	6.9%	11.5%	1.5%	6.6%
Single glazed	2.1%	5.3%	1.0%	2.4%
TOTAL	**100%**	**100%**	**100%**	**100%**

8.15 There is a clear correlation between the age of a property and its likelihood of being fully double-glazed (Figure 63). Older properties (i.e. pre-1950) have higher levels of single glazing compared to those built after 1950.

Figure 63: Double glazing by age of dwelling in Cumberland (Source: EPC Register)

	Property Age						
	Pre 1900	1900-1949	1950-1975	1976-1990	1991-2002	2003-2011	2012 onwards
Fully double glazed	74.6%	90.0%	96.2%	97.2%	98.3%	98.9%	99.5%
Partial double glazed	17.7%	7.9%	3.2%	2.2%	1.1%	0.7%	0.2%
Single glazed	7.7%	2.1%	0.5%	0.7%	0.6%	0.4%	0.2%
TOTAL	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Floor Area

8.16 The EPC database also contains a measurement of the floor area of a property. As shown in Figure 64, detached homes are much bigger on average than other dwellings in Cumberland.

Figure 64: Average Floorspace by Property type in Cumberland (Source: EPC Register)

	Average Floorspace (m^2)
Detached	166.7
Semi-detached	106.4
Terraced	73.6
Flat or maisonette	41.0
Caravan or other	57.8
TOTAL	**101.1**

8.17 Figure 65 below contains the detailed data by tenure, showing that owner occupied properties are typically much larger.

Figure 65: Average Floorspace by Tenure in Cumberland (Source: EPC Register)

	Average Floorspace (m^2)
Owner occupied	114.6
Private rent	107.4
Affordable Rented Housing	71.9
TOTAL	**101.1**

CO_2 Emissions

8.18 Figure 66 considers the side effect of energy use in the home, i.e. the level of CO_2 emissions produced by a property. The highest CO_2 emissions come from the private rented sector; and this is notably high amongst older properties (pre-1949). This again likely reflects the comparatively low levels of insulation in these older properties.

Figure 66: Average CO2 Emissions by Tenure and Age of Dwelling (Source: EPC Register)

	CO2 per annum (Tonnes)
Owner occupied	6.1
Private rent	6.4
Affordable Rented Housing	2.3
Pre 1900	8.7
1900-1949	5.5
1950-1975	4.5
1976-1990	4.0
1991-2002	4.2
2003-2011	3.4
2012 onwards	1.8

Energy Performance

8.19 Overall, across Cumberland, around 13% of properties are in the highest performance bands for SAP and 7% are in the two worst bands (F and G).

Figure 67: Percentage of Properties in Cumberland by SAP Band 2023 (Source: EPC Register)

EPC SAP Range Banded	Percentage
Band A (92-100)	0.2%
Band B (81-91)	12.9%
Band C (69-80)	23.2%
Band D (55-68)	41.3%
Band E (39-54)	15.2%
Band F (21-38)	5.1%
Band G (1-20)	2.0%
Total	100%

8.20 The EPC ratings of affordable housing in Cumberland show better results than owner occupied and private rented properties. Overall, the EPC ratings of owner-occupied properties are slightly worse than for private rented ones as shown in Figure 68:

Figure 68: SAP Score by Band for Cumberland by Tenure (Source: EPC Register)

BAND	Percentage of Dwellings			
	Owner Occupied	Private Rented	Affordable Rented Housing	Total
Band A (92-100)	0.2%	0.0%	0.0%	0.1%
Band B (81-91)	6.8%	0.9%	1.3%	5.0%
Band C (69-80)	19.6%	24.0%	45.4%	24.5%
Band D (55-68)	45.4%	43.0%	48.7%	45.6%
Band E (39-54)	18.3%	24.3%	4.0%	16.8%
Band F (21-38)	6.9%	5.7%	0.5%	5.7%
Band G (1-20)	2.8%	2.2%	0.1%	2.3%
TOTAL	100%	100%	100%	100%

8.21 A steady rise in the most prevalent SAP score can be seen when considering properties by age (Figure 69). The largest proportion of properties built before 1975 are Band D, similarly in those built 1976-2002, but with a notably larger proportion of Band C amongst the more recently built. A definite increase to Band C as the most common is present in the 2003-11 group, with a further increase to Band B post 2012.

Figure 69: Percentage of Dwellings by age and SAP score in Cumberland (Source: EPC Register)

	Property Age						
	Pre 1900	1900-1949	1950-1975	1976-1990	1991-2002	2003-2011	2012 onwards
Band A (92-100)	0.0%	0.0%	0.0%	0.1%	0.1%	0.4%	2.5%
Band B (81-91)	0.2%	0.2%	0.8%	1.1%	1.7%	4.9%	83.3%
Band C (69-80)	7.0%	16.5%	24.2%	40.3%	45.5%	73.2%	12.9%
Band D (55-68)	39.1%	53.6%	56.9%	46.0%	45.1%	18.6%	1.0%
Band E (39-54)	31.5%	21.6%	13.5%	10.4%	6.4%	2.7%	0.3%
Band F (21-38)	14.9%	5.8%	3.6%	1.9%	1.0%	0.2%	0.0%
Band G (1-20)	7.2%	2.2%	0.9%	0.3%	0.1%	0.0%	0.0%
TOTAL	100%	100%	100%	100%	100%	100%	100%

Cost to Remedy

8.22 A key national and local policy is to improve the quality of the private rented sector and, as noted above, 7.9% of the private rented sector in Cumberland sits in EPC Bands F or G (5.7% + 2.2% from Figure 68). To estimate the cost to remedy for Band F and G properties to bring them up at a Band C, we firstly considered if they had any options to effectively improve the property. 1% of these properties in Cumberland had no realistic means to improve the property to Band E or better. 24% would be able to improve the property to a Band E or Band D, but not be able to reach a Band C, leaving 76% of these properties able to improve to at least a Band C.

8.23 Of those private rented properties with an EPC of F or G that can improve to an E, but cannot realistically reach a C (24%), they would require on average £26,486 to reach an EPC rating of Band E. For those capable of achieving at least a Band C (76%), this would require an average of £31,418. However, it may be noted that the distribution of cost to remedy is quite large. As can be seen in Figure 70 below, over 13.1% of the properties able to be remedied to Band C can achieve this for less than £10,000; and over 17.6% of those that can only reach a Band E could also be brought up to that level for less than £10,000.

Figure 70: Cost to Remedy from Band F or G to Band C (Source: EPC Register)

	MEET BAND E	MEET BAND C
Less than £1,000	-	-
between £1,000 and £4,900	1.1%	0.3%
between £5,000 and £9,999	16.5%	12.8%
Between £10,000 and £14,999	15.4%	20.1%
£15,000 or more	67.0%	66.8%

8.24 In considering the figures above, it should be borne in mind that this refers to a comparatively small number of properties. As stated, only 7.9% of properties in the private rented sector are EPC F or G. Based on the census data in Figure 3, this amounts to only around 1,400 properties (7.9% of 17,723 private rented in 2021). Of these 1,400, given that 1% of them have no realistic way to improve to Band E or better, this is approximately only 14 dwellings. When discussing such small numbers of properties, it should be made clear that any analysis can only be considered an indicative approximation.

Fuel Poverty

8.25 A key issue in reducing energy consumption is tackling fuel poverty. Not only do dwellings where fuel poverty exists represent dwellings with poor energy efficiency, they are, by definition, occupied by residents with low incomes least likely to be able to afford improvements.

8.26 The Low-Income High Costs (LIHC) definition of fuel poverty was adopted by the government in 2013. Under the LIHC definition, a household is considered to be fuel poor if:

- Its required fuel costs are above the median level;
- Spending this amount on fuel costs would leave the household with a residual income below the official poverty line.

8.27 For each individual dwelling surveyed in an EPC, the energy efficiency software not only calculates the SAP rating and CO_2 emissions for a dwelling, but also the cost of heating that dwelling per annum. This cost is based on the standard model of heating the dwelling to 21 degrees Celsius in the main living rooms and 18 degrees Celsius in bedrooms and other rooms, over the course of a year.

8.28 The government now publish estimates of the number of households in fuel poverty by Lower Super Output Area (LSOA). An LSOA is a geographic building block of the Census, and typically contains between 500 and 1,000 dwellings. LSOAs do not match to parish boundaries but do match to local authority boundaries.

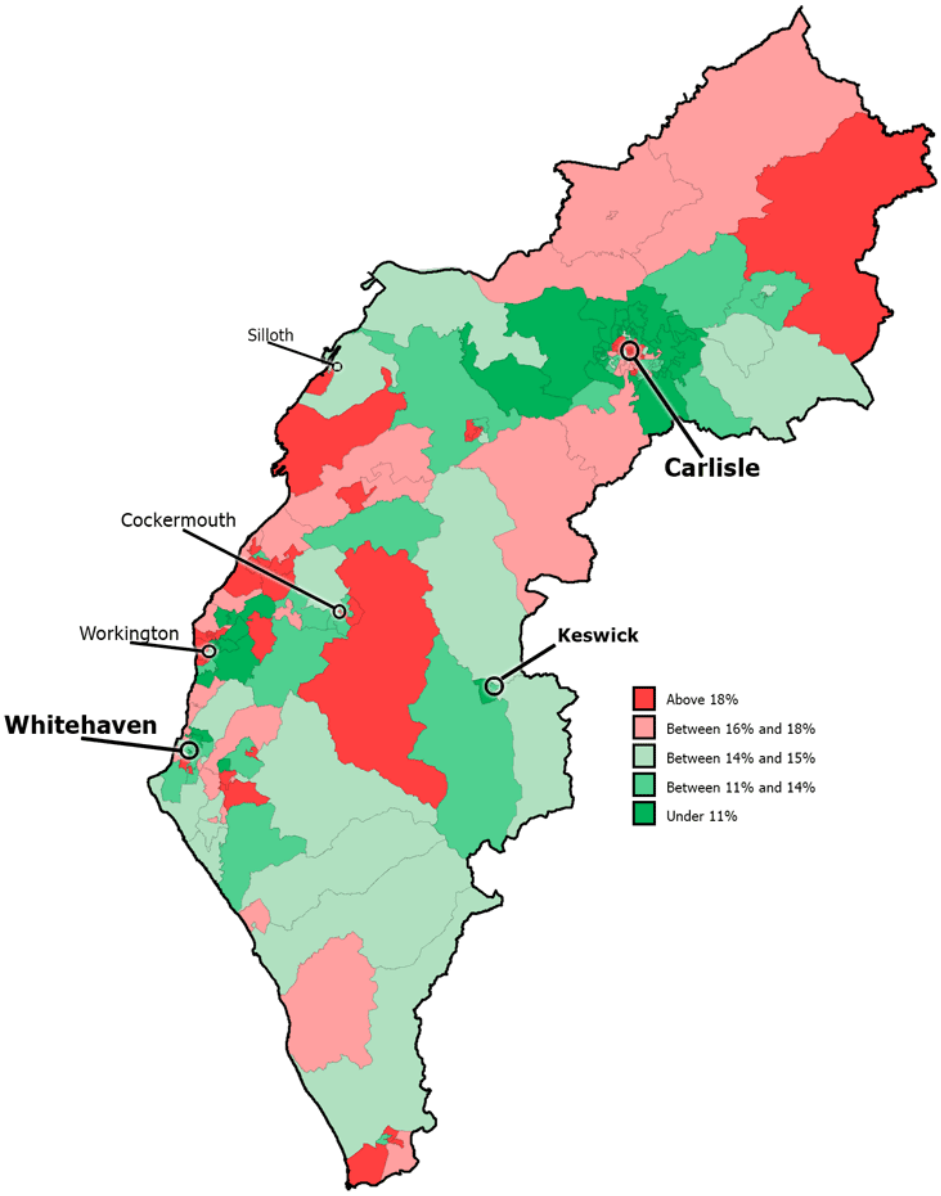
8.29 Government data now indicates that 14.4% of all households in Cumberland live in fuel poverty, as of 2022, which is above the North West and England average.

Figure 71: Percentage of Households Experiencing Fuel Poverty in 2022 (Source: Department for Business, Energy & Industrial Strategy)

	Percentage of Households		
	Cumberland	North West	England
TOTAL	14.4%	14.1%	13.1%

8.30 Figure 72 shows the distribution of fuel poverty by LSOA. While the highest rates for Category 1 hazards and Excess Cold are to be found in rural areas, these LSOAs also typically contain higher incomes. Therefore, highest concentration of fuel poverty is to be found in urban areas.

Figure 72: Percentage of Households Experiencing Fuel Poverty by Lower Super Output Area in 2022 (Source: Department for Business, Energy & Industrial Strategy)



Chapter Summary

8.31 Across Cumberland, around 92% of properties have central heating as their main heating source but many properties, especially in private rent, still do use storage or single room heaters which tend to be less energy efficient and more expensive. In general, the heating systems of most properties are considered to be fairly good. However, around 13% of those in the private rent sector are considered to be very or fairly poor.

8.32 A higher prevalence of 200mm or more loft insulation has been observed in newer properties, social rented properties and detached properties.

8.33 78% of properties which have cavity walls also contain insulation of those walls in Cumberland, which is higher than the national average, with the private rented sector being particularly high when compared to the rest of England.

8.34 Most properties are fully double glazed but private rented properties are more likely to be exclusively single glazed than other tenure types. Newer properties have higher levels of double glazing than older properties.

8.35 Older housing stock in Cumberland have higher rates of CO_2 emissions and energy use which likely reflects their lower levels of insulation.

8.36 Overall, across Cumberland, around 13% of properties are in the highest performance bands for SAP and 7% are in the two worst bands (F and G). Overall, the EPC ratings of owner-occupied properties are slightly worse than for private rented ones as shown in Figure 68.

8.37 Government data now indicates that 14.4% of all households in Cumberland live in fuel poverty, as of 2022, which is above the North West and England average.

9. Conclusions

Overall Key Points

Tenure Trends

9.1 Across the whole of Cumberland, owner occupation rates appear to have stabilised, but the private rented sector is still growing. The private rented sector is still smaller than for England or the North West as a whole, but going forward the current tenure split is likely to remain relatively stable without major changes in government policy driving new affordable housing development.

9.2 For Cumberland, over 25% of the stock was built before 1900. This has large implications not only for the current condition of the stock, but also for the cost of remedying any Category 1 hazards or non-decent properties.

Homelessness

9.3 40 households in Cumberland are currently in temporary accommodation. 1,227 households were made homeless in 2022/23. The largest reason is that friends and family were no longer willing and/or able to accommodate them (313), and 260 were due to the end of a private rented tenancy.

9.4 This situation is clearly not good, but the Council has limited policy options to respond to it. It can be assumed that all the households in temporary accommodation in the private rented sector are unable to address their own housing needs and would ideally require affordable rented accommodation. However, this does not exist in sufficient quantity to meet their needs.

9.5 The private rented sector in Cumberland contains many households receiving housing benefit support, and a lack of security of tenure and ability to maintain financial stability will continue to see many households facing statutory homelessness.

Overall Population

9.6 Between 2011 and 2021, the population of Cumberland fell by 1,295 persons. There was a growth of 9,939 in the population aged over 65 years, while the population aged under 65 years dropped. Therefore, the population of Cumberland is becoming older on average.

9.7 The data shows that relatively the affordable rented sector has the highest share of children, while the share of children in owner occupation is much lower. The population aged 20-44 years are much more concentrated in the private rented sector, while number of people aged 50 years and above are more likely to be in owner occupation. In the longer-term, the outstanding question remains how households who are currently renting will transition into becoming owner occupiers. Central Government has created schemes such as First Homes to assist households into owner occupation and many will also inherit property, but it is also the case that many current private rented tenants will remain in this tenure for the long run. It is therefore important that the stock condition and tenure security of the private rented sector continue to improve.

Employment and Income

9.8 There are a number of key statistics around the employment and income data for Cumberland:

- The share of the population of Cumberland in employment is higher than the North West average but slightly lower than the average for England;
- The population who are long-term sick is higher than the rate of the English average but lower than the North West average;
- Households in receipt of housing benefit and/or Universal Credit in Cumberland are lower than the rate of the North West and the rate for England;

9.9 On this basis the population of Cumberland has poorer health when compared to the rest of England. However, this is likely due to the age profile of the area given that the State Pension is the main means of support, with the average number of claimants being higher than the averages for England and the North West.

Rental Costs

9.10 The cost of renting in Cumberland is notably lower than the regional and national averages. Entry level rents were also shown to be lower than their equivalent LHA rates which implies that if a household is dependent upon housing benefit to cover their rental costs, then they will currently be able to afford property at the lower quartile rates in Cumberland.

9.11 However, the LHA rates are now expected to be frozen until 2027/28. This could see a growing gap between rents in Cumberland and the level of LHA and is likely to have contributed to the growth in statutory homelessness. Households will find it increasingly difficult to find a property compatible with their LHA benefit; and any additional money required to cover rents must come from the rest of their budget.

Stock Condition

9.12 Data from the EHS 2020 shows that Cumberland is estimated to have had 17.9% of its housing stock with Category 1 hazards in 2020, compared to 12.3% for the North West and 9.2% for England. The private rented stock is modelled to have the highest rate of Category 1 hazards, with terraced properties also scoring more highly.

9.13 Further modelling to 2023 shows that 18.9% of all owner occupied dwellings and 23.1% of all private rented dwellings having a Category 1 hazard. Overall, this equates to around 17,500 owner occupied and 4,000 private rented properties which contain a Category 1 hazard.

9.14 England has an average of 1.9% of properties with excess cold, while Cumberland's average is 6.4% for owner occupied and 5.4% for private rented. This is around 6,100 owner occupied and 1,100 private rented properties in total.

9.15 In the most recent EHS data, around 4% of all properties experience damp. However, the modelling for Cumberland shows an average of 5.4% for owner occupied and 8.0% for the private rented sector. This is around 5,100 owner occupied properties and 1,400 private rented dwellings with damp.

9.16 Modelled outputs show that 23.1% of owner occupied and 27.9% of private rented are non-decent. This is around 20,000 owner occupied and 5,000 private rented properties in 2023.

Energy Efficiency

9.17 There are a number of areas where energy efficiency could be improved across Cumberland:

- While most properties have fairly or very good heating systems, 13% of those in the private rented sector are considered to be poor;
- The number of properties with 200mm of loft insultation is lower in older private rented properties;
- A similar story applies for double glazed windows, which are less frequent in the private rented sector; and
- All of the above factors see considerable variation in energy use across properties in Cumberland, with older properties having higher energy use, as reflected by CO2 emissions.

9.18 Around 7.9% of properties in the private rented sector are in the lowest energy performance bands, which is around 1,400 properties. The cost to bring these up to Band E would typically be over £10,000 per property.

9.19 Government data now indicates that 14.4% of all households in Cumberland in 2022 live in fuel poverty, which is above the North West and England averages.

9.20 Therefore, the housing stock of Cumberland has improved considerably in recent years, but there is still potential for further improvements, which would not only benefit the tenants and owner occupiers of Cumberland, but also could offer a wider economic boost to the area through job creation.

Key Policy Issues

9.21 Around one in four properties in Cumberland was built before 1900. Many of the properties which do experience Category 1 hazards, damp and non-decency in Cumberland were built before 1900. Around 75% of all excess cold cases are to be found in these properties, and similar percentages will apply to falls on the stairs and the level. However, many of these properties are highly prized for their characteristics and locations, but removing Category 1 hazards from them is often difficult and expensive. Even with a very large investment, the overall stock of Cumberland is likely to remain poor compared to the English average because of the age of the housing stock. However, this does not mean that improvements cannot continue to be made.

9.22 For government policy and also for most stock condition studies, a key consideration is how to improve conditions in the private rented sector. However, in Cumberland, approximately four times more owner occupied properties are impacted by Category 1 hazards, damp and non-decency than is the case for private rented properties. As noted in Chapter 2, Right to Buy policies have seen around 16,000 properties sold from affordable housing to become market housing since 1985. Many of these were built in the 1950s-1970s and have seen little investment since they were sold. These properties are likely to make up a significant share of the total owner occupied stock condition problems for properties, other than those build pre 1900. The owners of these properties are now often older households with limited income, so the continued funding of schemes targeting low income owner occupiers will remain important.

9.23 The 2021 Census saw a reduction in the number of terraced properties, with a growth in converted flats. This is turn will have seen a rise in the number of Section 257 HMOs in the private rented sector. In parts of all urban areas around 10% of the stock is formed from converted flats, so the continued monitoring and enforcement of housing standards for converted flats is an important policy issue.

9.24 The EPC data shows that there is still room for some improvement in the insulation, windows and heating systems of Cumberland. While, many of the simpler cases will have already been addressed, only 1.2% of stock has a heat pump as part of its primary heating system, with many of these being fitted in new properties. Therefore, there is room for improvement in many properties by upgrading the heating system, combined with improved insulation and windows.

9.25 As noted in Chapter 6, the risk of flooding is not typically considered as a separate hazard but Cumberland has seen significant recent flooding. Therefore, continued measures to improvement flood defences and property flood resilience should remain priorities for the Council.

9.26 Empty homes numbers in Cumberland are above national averages, with much of this linked to second and holiday homes. However, there will still be many existing homes which can be brought back into use with investment and these will help address housing delivery targets as well as providing suitable accommodation for a household.

Appendix A

Table of Figures

Appendix B
Housing Legislation and Requirements

Housing Acts and other Legislation

Section 605 of the Housing Act 1985 (as amended) placed a duty on local authorities to consider the condition of the stock within their area, in terms of their statutory responsibilities to deal with unfit housing, and to provide assistance with housing renewal. Section 3 of the Housing Act 2004 replaced this with a similar duty to keep housing conditions under review.

The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 came into effect on the 19 July 2003 and led to major change in the way local authorities can give financial help for people to repair or improve private sector homes. Before the Order, the Government set clear rules which controlled the way financial help could be given and specified the types of grants which could be offered. The Order set aside most of these rules (apart from the requirement to give mandatory Disabled Facility Grants). It now allows Local Authorities to adopt a flexible approach, using discretion to set up their own framework for giving financial assistance to reflect local circumstances, needs and resources.

The Office of the Deputy Prime Minister (ODPM), published guidance under Circular 05/2003. In order to use the new freedom, a local authority must prepare and publish a Private Sector Renewal Policy. The policy must show that the new framework for financial assistance is consistent with national, regional and local policies. In particular, it has to show that the local priorities the strategy is seeking to address have been identified from evidence of local housing conditions including stock condition.

The Housing Act 2004 received Royal Assent in November 2004. The Act makes a number of important changes to the statutory framework for private sector housing, which came into effect in April 2006:

- The previous fitness standard and the enforcement system have been replaced by the new Housing Health and Safety Rating System (HHSRS).
- The compulsory licensing of higher risk houses in multiple occupation (HMO) (five or more tenants and two or more households).[7]
- New discretionary powers including the option for selective licensing of private landlords, empty dwelling management orders and tenancy deposit protection.

Operating Guidance was published on the Housing Health and Safety Rating System in February 2006. This guidance describes the new system and the methods for measurement of hazards, as well as the division of Category 1 and 2 hazards. Guidance has been issued by the ODPM on the licensing provisions for HMOs, which describes the high-risk HMOs that require mandatory licensing and those that fall under additional, discretionary licensing.

As the Rating System has now replaced the fitness standard, this report deals with findings based on statutory hazards, not unfitness.

[7] A requirement for the property to be 3 storeys was removed in 2018, so now the key determinant is 5 or more people and 2 or more households.

The Housing Act 2004 was updated and amended as part of the Housing and Planning Act 2016 which received royal assent in May 2016. However, the amendments do not have any major impact on the regulatory powers available to local authorities with the exception of changes relating to rights to prosecute private landlords.

Mandatory Duties

Unfit houses (Housing Act 1985) *- to take the most satisfactory course of action – works to make property fit, closure/demolition or clearance declaration.*

With effect from April 2006 replaced by:

Category 1 hazards, Housing Health and Safety Rating System (HHSRS) (Housing Act 2004) *– to take the most satisfactory course of action – improvement notices, prohibition orders, hazard awareness notices, emergency remedial action, emergency prohibition orders, demolition orders or slum clearance declaration.*

Houses in Multiple Occupation (Housing Act 1985) *- to inspect certain HMOs, to keep a register of notices served, to require registration where a registration scheme is in force.*

With effect from April 2006 replaced by:

HMO Licensing by the Authority (Housing Act 2004) *of all HMOs with five or more residents and two or more households. Certain exceptions apply and are defined under sections 254 to 259 of the Housing Act 2004.*

Overcrowding - (Housing Act 1985) *- to inspect and report on overcrowding*

Now in addition:

Overcrowding – (Housing Act 2004) *– to inspect and report on overcrowding as defined under sections 139 to 144 of the Housing Act 2004 along with statutory duty to deal with any Category 1 overcrowding hazards found under the HHSRS.*

The provision of adaptations and facilities to meet the needs of people with disabilities ***(Housing Grants, Construction and Regeneration Act 1996)*** *- to approve applications for Disabled Facilities Grants for facilities and/or access*

Energy Conservation (Home Energy Conservation Act 1995*) - to have in place a strategy for the promotion and adoption of energy efficiency measures, and to work towards specified Government targets to reduce fossil fuel use. This should contain assessment of:*

The cost of proposed energy conservation measures

The extent of decreases in nitrogen and sulphur dioxide into the atmosphere

The extent of decreases in carbon dioxide into the atmosphere

The number of jobs created from the measures taken

Requirements of authorities under the Act

Under revised Guidance (March 2013) all English authorities need to prepare further reports (by 31 March 2013) setting out the energy conservation measures that the authority considers practicable, cost-effective and likely to result in significant improvement in the energy efficiency of residential accommodation in its area.

Authorities should have regard in their reports to:

(i) measures that take advantage of financial assistance and other benefits offered from central Government initiatives, such as the Green Deal, ECO and Renewable Heat Incentive or other initiatives, to help result in significant energy efficiency improvements of residential accommodation; and

(ii) measures which an authority has developed to implement energy efficiency improvements cost-effectively in residential accommodation by using area based/street by street roll out involving local communities and partnerships (e.g. social housing partners, voluntary organisations and town/parish councils).

Reports should set out any existing timeframe for delivery and national and local partners they propose to work with in effecting such measures to support local accountability.

Progress reports to be made at 2 yearly intervals, starting March 2013, and to publish these electronically on their website with a link to be forwarded to the Secretary of State.

Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

The Regulations came into force on 1 June 2020 and form part of the work to improve safety in all residential premises - and particularly in the private rented sector.

The Regulations require landlords to have the electrical installations in their properties inspected and tested by a person who is qualified and competent, at least every 5 years. Landlords must provide a copy of the electrical safety report to their tenants, and if requested to their local authority. Local authorities can require landlords to carry out vital remedial works or even arrange for the repairs to be done and recover their cost from the landlord.

Homes (Fitness for Human Habitation) Act 2018

The Act came into force on 20 March 2019. The aim of the Act is to help drive up standards in rented homes in both the social and private sectors and provide an alternative means for tenants to seek redress from their landlord if their rented property presents a risk of harm to the health and safety of the occupiers.

Under the Act, sections are inserted into the Landlord and Tenant Act 1985 requiring all landlords (private and social) to ensure that their properties, including any common parts of the building, are fit for human habitation at the beginning of the tenancy and throughout. The Act does so by implying a covenant to this effect in the tenancy agreement.

Environmental Protection Act 1990

Statutory nuisance is defined in section 79 of the Environmental Protection Act 1990. The Act contains a specific list of matters that amount to statutory nuisances and a more general category comprising 'any other matter declared by any enactment to be a statutory nuisance'. Specific matters include issues like smoke, fumes or dust from premises, noise and light and accumulation of waste. The Act allows local authorities to bring enforcement action to address the statutory nuisance.

Domestic Minimum Energy Efficiency Standard (MEES) Regulations

The MEES Regulations set a minimum energy efficiency level for domestic private rented properties. The Regulations apply to all domestic private rented properties that are:

- *let on specific types of tenancy agreement*
- *legally required to have an Energy Performance Certificate (EPC)*

If the property has an EPC rating of F or G, the landlord must take appropriate steps to comply with the requirements of the MEES Regulations. The (MEES) regulations changed with effect from 1 April 2024, such that the prohibition on new lettings of sub-standard, non-domestic properties now extends to the continuation of any existing lease of a sub-standard, non-domestic property.

Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 came into force on 1 October 2015 . The updated Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 came into force on 1 October 2022. From that date, all private and social landlords must:

1. Ensure at least one smoke alarm is equipped on each storey of their homes where there is a room used as living accommodation. This has been a legal requirement in the private rented sector since 2015.

2. Ensure a carbon monoxide alarm is equipped in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers).

3. Ensure smoke alarms and carbon monoxide alarms are repaired or replaced once informed and found that they are faulty.

HMO Requirements

The legal minimum standards for Houses in Multiple Occupation (HMOs) are contained in Statutory Instrument 2006 No 373, with amendments contained in Statutory Instrument 2007 No 1903. These standards apply to all HMOs, whether or not they need to be licensed.

The standards set out in Statutory Instrument 2006 No 373, schedule 3 stipulate the following:

- An adequate means of space heating must be provided in each letting and in bathrooms, whether shared or not;
- Kitchens and bathrooms must be adequately ventilated, including extractor fans in kitchens;
- Kitchens, bathrooms and toilets must be of adequate size and layout and be suitably located in the HMO in relation to the lettings;
- All baths, showers, wash hand basins and sinks must be fitted with taps supplying cold water and a constant supply of hot water;
- For up to 4 occupiers, there must be at least one bathroom and toilet (which can be in the bathroom). This has been amended by Statutory Instrument 2007 No 1903 to say that there must be an adequate number of bathrooms, toilets and wash hand basins for personal washing for the number of persons sharing those facilities, and where reasonably practicable there must be a wash hand basin with appropriate splash back in each unit;
- For five or more occupiers, there must be at least one bathroom for every 5 sharers, and a separate toilet for every 5 sharers. This has been amended by Statutory Instrument 2007 No 1903 to say that there must be an adequate number of bathrooms, toilets and wash hand basins for personal washing for the number of persons sharing those facilities, and where reasonably practicable there must be a wash hand basin with appropriate splash back in each unit;
- Adequate size and layout kitchen for the number of sharers, containing sinks with draining boards, cooking equipment, worktops, storage cupboards, for food and crockery and utensils, fridge/freezers (combined or separate), and electrical sockets;
- Adequate refuse disposal facilities;
- Adequate fire precautions including fire doors and fire blankets as appropriate.

HMOs should also be assessed against the Housing Health and Safety Rating System and the appropriate enforcement action should be taken, where necessary, to ensure any deficiencies are rectified.

The Management of Houses in Multiple Occupation England 2006 and Licensing and Management of Houses in Multiple Occupation and other houses (miscellaneous provisions) (England) Regulations 2006. Regulation 8 and Schedule 3 govern the following requirements for heating, space, light and ventilation in HMOs.

Heating

The normally accepted standard is a central heating system (preferably gas fired), or fixed heaters (electric heaters should be hard wired, not plugged into the room sockets). Portable electric fires, convector heaters or oil filled radiators, gas cylinder powered heaters or paraffin heaters are not acceptable.

Space

Letting rooms should be not less than 10 m^2 for a single letting, which can be reduced to 7 m^2 if there is a communal lounge. Double rooms should be 15 m^2 and 11 m^2 respectively.

Natural Light and Ventilation

Clear glazing equivalent in area to 10% of the floor area of the room should be provided in each letting. Openable windows equivalent in area to 5% of the floor area of the room should be provided in each letting. Doors to open air cannot be included in the reckoning.

Fire Safety

Fire safety provisions and equipment should be provided as appropriate to the accommodation in line with the domestic fire safety standard.

Fire Alarms

Fire can break out in even the most safety conscious household, and should this happen, toxic smoke can very quickly spread throughout the house. It is most important, therefore, to alert the occupants as soon as possible that a fire has broken out in the house. The most effective way of providing this early warning is to fit electrically operated fire detection and alarm systems.

These can range from single, battery-operated smoke alarms which are widely available from only a few pounds to quite sophisticated mains operated systems linked to a remote monitoring service who will alert East Sussex Fire & Rescue should the alarm be actuated in the property. Both Worcester City Council and East Sussex Fire & Rescue recommend a system of smoke and heat alarms which are mains operated and have a battery backup. Smoke alarms must be interlinked, either by physical inter-wiring or by a wireless signal, so that when one alarm detects a fire, all the alarms in the building will sound.

In single family homes and low risk houses in multiple occupation the normal standard would be to provide smoke alarms in the circulation space (hall, stairs and landing) and heat alarms in the kitchen. In most other types of HMO additional alarms are located inside the lettings.

Means of Escape

In all cases there should be a clear escape route from all parts of the house to open air. This is usually the landing, staircase and hallway to the front door. These routes must be kept clear of obstruction and a lockable door should be able to be opened from the inside without using keys. In all but the low risk Houses in Multiple Occupation, doors onto the escape route should be to an approved fire resisting standard. Windows are not accepted as means of escape however ground and first floor windows must be openable to allow exit or access for rescue should the normal escape route not be available.

Landlord Fire Safety Responsibilities

Since the introduction of the 2015 Smoke alarm and Carbon Monoxide Alarm (England) Regulations (amended in 2022), most private landlords (there are exceptions to the statutory instrument in cases such as student halls of residence, social landlords, long leases, care homes etc.) are required to fit a smoke alarm on every floor of their property and a carbon monoxide alarm in any room containing a fixed combustion appliance (excluding gas cookers), such as log burners or open fires. There is a further requirement that these are repaired or replaced when the landlord is informed, and the alarms are confirmed to be faulty. The enforcement of these regulations is the responsibility of the local housing authority; and landlords can be fined for failure to comply with the requirements.

Mandatory, Additional and Selective Licensing

The licensing of rental properties is a process whereby the person responsible for the property must apply for a license to rent from the relevant authority. The authority then ensures that the licensee is a "fit and proper person", and that the property itself is suitable for occupation by the number of tenants proposed. Tenants should have a system to report defects (including responses), periodic inspections should take place, and adequate funding for repairs should be confirmed where necessary (e.g. such as if the landlord is not the manager of the property).

In addition, in the case of HMOs, the license ensures that there is compliance with The Management of Houses in Multiple Occupation (England) Regulations 2006 (note that this legislation applies to all HMOs). These regulations require that the HMO is kept safe (e.g. fire safety provision, gas safety certificates, PAT testing of electrical items), a reasonable state of cleanliness (for common areas) and in an appropriate state of repair.

The Housing Act of 2004 prescribed that it is mandatory for any HMO meeting all three of the following criteria to be licensed:

The property is three or more storeys high[8]

The property has five or more people in more than one household, and

The occupants share amenities such as bathrooms, toilets or cooking facilities.

Exceptions are made in cases where the property is managed by a housing association or other social authority, where the property is wholly in the form of self-contained flats, or where the basement is in commercial use with only two residential storeys above. This legislation therefore broadly covers large HMOs; which government consider high risk. The majority of HMOs in the study area are S257 HMOs and as such are not subject to mandatory licensing since they do not satisfy the above criteria.

Councils have the power to impose licensing on other HMOs not covered by the above. This is known as Additional Licensing and can be introduced if there is an issue with a significant proportion of other types of HMO being poorly managed and giving rise to problems for tenants or the wider neighbourhood. Additional Licensing means that all HMOs in the affected area are required to apply for a license in the same way as the mandatorily licensed large HMOs.

The Housing Act also gives local authorities the power to require further classes of property to be licensed; and is an option to be considered to tackle problems such as antisocial behaviour, low demand for rental properties, poor property conditions or high levels of crime, migration or deprivation. This is known as Selective Licensing and requires almost all private landlords (again there are certain exceptions) in the designated area to apply for a license. Since 2010, there has been a General Approval for all such schemes, modified in 2015 to being generally approved as long as they encompass less than 20% of the authority, or less than 20% of the private rental market. If either of these criteria are exceeded, the scheme requires confirmation from the Secretary of State. This stipulation is designed to ensure that local authority focus is on problem areas, rather than simply applying licensing to the whole area.

[8] The requirement for the property to be 3 storeys was removed in 2018, so now the key determinant is 5 or more people and 2 or more households.