



Private Sector Housing Strategy

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EXECUTIVE SUMMARY

This strategy sets out the strategic direction for Private Sector Housing Enforcement as delivered by the Private Sector Housing Team.

Its purpose is to set the context as to how we intend to meet the challenges and opportunities confronting the service and to set out the key priorities for action and delivery. Whilst housing conditions in the private sector are generally good, there are still a number of properties that present serious hazards within the private sector.

Our priorities will focus on raising standards in the private sector, paying particular attention to ensuring fire safety in Houses of Multiple Occupation (HMOs) and removing or reducing serious hazards across both single and multiple occupancy households. We will work with private and registered social landlords to encourage and support them to improve standards and increase the supply of affordable accommodation, taking robust action against landlords who fail to remedy hazards, licence HMOs or comply with property management regulations in line with the Council's adopted enforcement policy.

We will consider using various means of enforcement under housing legislation to tackle rogue landlords with financial penalties being considered as an alternative to prosecution. As housing supply continues to be a challenge with numerous empty homes in the district, a priority will be to maximise existing housing stock by focused interventions to return empty homes to use with the development of an existing Long-Term Strategy for Empty Properties.

1.0 INTRODUCTION

At Cotswold District Council, we are committed to ensuring that all our residents live in homes that are safe and meet the required standards. We recognise most landlords want to be compliant and provide a good standard of home to their tenants.

This strategy outlines the Council's approach to regulating the private sector for residents as having safe, secure and affordable accommodation is a key foundation for living well. By identifying deficiencies in a dwelling, evaluating the potential risks to a person's health or safety, including person's physical or mental health we can ensure the relationship between housing and health is a continuing process to achieve well living and a required standard of housing.

The strategy mainly focuses on homes in the Private Rented Sector (PRS) but also considers owner-occupiers and Registered Providers. Through 'proactively and effectively tackling poor conditions in the private housing sector', we can ensure that the private sector provides a safe and accessible housing option.

The following sections of the strategy identify the key challenges in the pursuit of improving housing conditions within the private and public sector. Our vision is:

“ Ensuring that private sector housing is always a safe and suitable housing option. We will achieve this by tackling poor and ‘rogue landlords’ who have a clear disregard for their responsibilities and the safety of their tenants, taking appropriate enforcement action and offering advice and assistance to homeowners, landlords and tenants.”

In order to realise this vision, the Council has agreed the following four strategic priorities:

- Raising standards in the private sector
- Maximising use of existing private sector stock
- Regulating the private sector
- Collaborative working

We are committed to continuously reviewing and improving the private sector housing services we deliver by working with partners, other public bodies, landlords and Registered Housing Providers. Making sure that homes meet required standards means that residents can thrive in safe and clean environments.

2.0 NATIONAL AND LOCAL CONSIDERATIONS

On a national scale, the private rented sector is the fastest growing housing tenure type, having more than doubled in size over the last decade. This growth, alongside the gradual decline of social rented stock due to the success of policies such as the ‘Right to Buy’, means that private renting is increasingly becoming the primary option for addressing housing need across the country.

One of the key aspects of our work within the private rented sector is to ensure that homes are safe places to live. When problems causing a health and safety implication are found in rented properties, the landlord will be required to put these right or otherwise face enforcement action. This action would follow guidance from the Housing Health and Safety Rating System (HHSRS).

Central government is in the process of introducing wholesale changes to the national housing regulation system through its Renters Rights Act 2025. The changes to the legal framework will introduce statutory duties to local authorities, bring social housing providers into a scheme for response to dampness and mould hazards (Awaab’s law) from 27 October 2025 and abolish no fault evictions. While additional funding will likely be provided for implementing the new law, funding in the future is probably going to be derived from civil penalties. This will place an impetus on local authorities to enforce

housing standards better. The Government is considering the introduction of a standard policy for civil enforcement to promote consistency across the country, which is expected to be in line with the Council's newly adopted Civil Penalties Policy.

3.0 RELATED POLICIES

The Private Sector Housing Strategy aligns with a number of related Policies which are outlined in Table 1 below.

Table 1

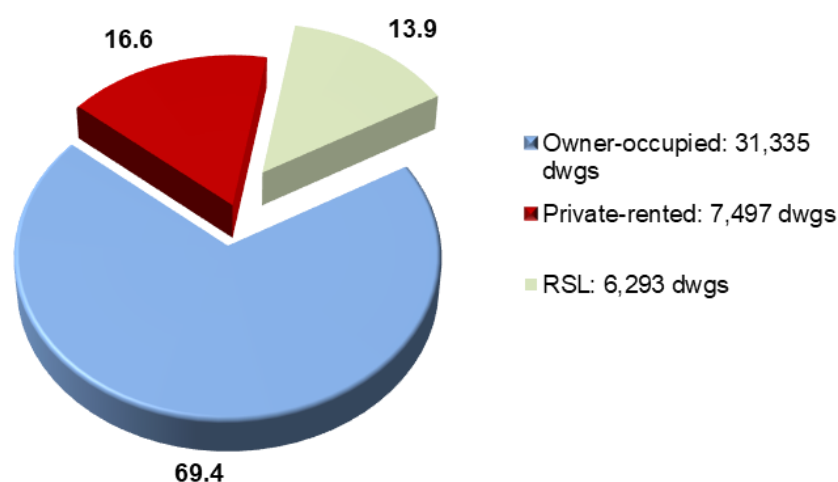
Strategy/Plan/Service	Relevance to Policy
The current Housing Plan sets out our plans for housing in the Cotswold district and links government policy on housing with the local approach to addressing housing-related issues in the Cotswold district.	The work in responding to potential illegal evictions and to regulated and improve standards rental accommodation fosters partnership working, provide better and more secure accommodation, particularly for more vulnerable residents.
Long Term Empty Property Strategy 2024 to 2029	The Private Sector Housing Strategy advocates the use of regulatory powers to tackle empty properties that are blighting a neighbourhood, to adopt a holistic approach to bringing these properties back into use.
Gloucestershire Health and Wellbeing Strategy 2019 to 2030, Gloucestershire County Council	The principles of this strategy of preventing ill health, tackling health inequalities and closer collaboration align with the Private Sector Housing Strategy to improve the living environment of its residents, reducing their exposure to poor conditions and the impacts on health from these.
Joint Strategic Needs Assessment	This is the means by which the Primary Care Trust (PCT) and local authorities work together to understand the future health, care and well-being needs of their community. The Private Sector Housing Strategy, seeks

Strategy/Plan/Service	Relevance to Policy
	to improve the living conditions of residents, which is relevant to determining future need.
Climate Change Policy	Aimed at reducing CO2 emissions in the Cotswold District, it supports energy efficiency measures in homes. The Private Sector Housing Strategy is concerned with compliance with minimum standards for energy efficiency and signposting to the Warm and Well Initiative.

4.0 STANDARD OF PRIVATE STOCK

Nationally there has been an increase in the percentage of households in privately rented accommodation over the past decade. With this increasing trend it is important for the Council to understand the condition of the private sector accommodation within the area to plan effective resourcing. The most effective way of collating this information is to undertake a periodic stock condition survey, historically on a 10-year rolling programme, which the Council has been conducting for several decades. The current housing stock data for Cotswold District, undertaken in 2023 shows the following breakdown of dwelling tenure:

Chart1- Total private sector housing



District Wide House Conditions Survey 2023

5.0 DECENT HOMES

For a dwelling to be considered 'decent' under the Decent Homes Standard it must:

- meet the statutory minimum standard for housing (the Housing Health and Safety System (HHSRS) since April 2006), homes which contain a Category 1 hazard under the HHSRS are considered non-decent
- provide a reasonable degree of thermal comfort
- be in a reasonable state of repair
- have reasonably modern facilities and services

In 2022, 15% or 3.7 million dwellings in England failed to meet the Decent Homes Standard. Private rented dwellings had the highest proportion of non-decent homes (21%) while the social rented sector had the lowest (10%). Among owner occupied homes, 14% failed to meet the Decent Homes Standard. The new Renters Reform Bill will introduce a mandatory requirement to meet the Decent Homes Standards for private sector Housing as well as social housing.

Table 2 Non-Decent Homes and Category 1 Hazards by tenure, England, 2023, number and percentage.

Tenure	Non-Decent Homes		HHSRS Category 1 Hazards	
	Number	Percentage	Number	Percentage
Owner Occupied	2,337,000	14.3	1,322,000	8.1
Private Rented	1,031,000	21.1	496,000	10.2
Local authority	191,000	12.1	91,000	5.8
Housing Association	240,000	9.3	85,000	3.3
All housing	3,799,000	15.0	1,995,000	7.9

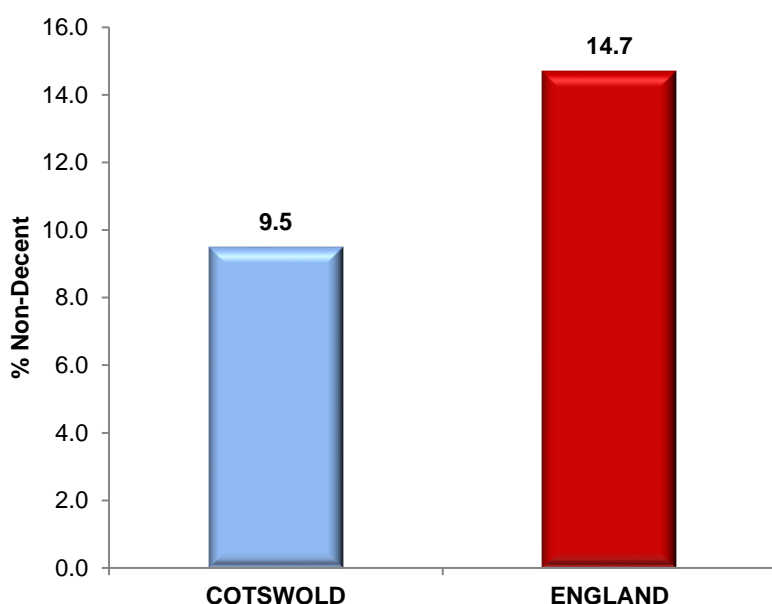
(Source: 2023-2024 English Housing Survey Headline Report: Housing Quality and Energy Efficiency, Chapter 1, Annex Tables)

Key Findings

- **There are an average of 15% Non-Decent Homes across England with rates of incidence highest in the private rented sector (21%) and lowest in the housing association sector (9%);**

- There are category 1 hazards in an average of 8% homes across England with rates of incidence highest in the private rented sector (10%) and lowest in the housing association sector (3%);
- Although the percentage is lower, the actual numbers of owner-occupied homes which are either Non-Decent or have a category one hazard is actually higher than for all other tenures.

Chart 2: Non-Decent Homes – Cotswold 2023, England 2021

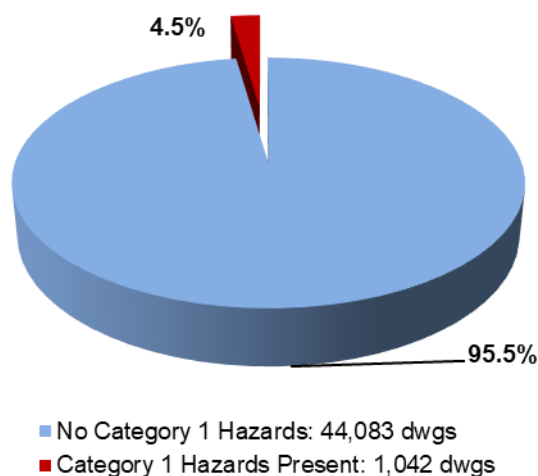


District Wide Stock Conditions Survey 2023

6.0 HOUSING HEALTH AND SAFETY RATING SYSTEM (HHSRS)

The HHSRS is a risk-based assessment that identifies hazards in dwellings and evaluates their potential effects on the health and safety of occupants and their visitors, particularly vulnerable people. The most serious hazards are called Category 1 hazards and where these exist in a home it fails to meet the statutory minimum standard for housing in England. In 2022, 8% or 2.1 million dwellings in England had a HHSRS Category 1 hazard, less than in 2021 (9%). Such hazards were more prevalent in the private rented dwellings (12%) than owner occupied (9%) or social rented dwellings (4%) (Department for Levelling Up, Housing and Communities). The Chart below shows the current data on category 1 hazards:

Chart 3: Category 1 Hazard Failure



7.0 DAMP

In the English Housing Survey, a home is considered to have damp or a problem with damp if the surveyor records damp which is significant enough to be taken into consideration when making their HHSRS assessments. Therefore, minor issues of damp are not recorded and, for consistency, would not be part of the modelled data. In 2022, 4% or 1 million dwellings in England had a problem with damp. Between 1996 and 2011, there was a sizable reduction in the prevalence of all dwellings with any damp problems, however incidences of damp have increased since 2019 from 3%. While this goes against the general trend of improvement, it is not necessarily surprising - due to the COVID-19 national lockdowns the rate of maintenance and repairs could have slowed or stalled, making remediation of damp problems difficult (Department for Levelling Up, Housing and Communities).

8.0 RAISING STANDARDS IN THE PRIVATE SECTOR OFFERING INFORMATION, ADVICE AND SPECIALIST SUPPORT

The overriding aim of the Environmental Health Team is to secure the best possible standards in the private sector. The team's core function is to ensure that statutory standards are met using enforcement powers as and when necessary. However, its work goes beyond that, advising and intervening to help tenants, owner occupiers and landlords with a wide range of housing issues.

9.0 ENGAGING WITH LANDLORDS

As in many parts of the country, the privately rented sector makes a very valuable contribution to the supply of affordable housing. A well-managed, well maintained private rented sector can play a very valuable role in Gloucestershire by helping:

- to make more properties available to vulnerable households;
- help vulnerable households to find suitable accommodation;
- to reduce homelessness.

In recent years, officers in both the Housing Standards Team and the Homelessness/Housing Needs/Advice Team have worked to develop a positive working relationship with landlords who want to deliver good quality housing. Landlords forums are run jointly with Decent and Safe Homes (DASH) as well as the National Residential Landlords Association (NRLA). The Forums allow a positive exchange of information on housing issues and standards. The Covid period suspended this work, and the new strategy aims to reinvigorate this partnership work, not least because of the new requirements to be introduced under the Renters Reform Bill.

10 ENERGY EFFICIENCY

The Domestic Minimum Energy Efficiency Standard (MEES) Regulations set a minimum energy efficiency level for domestic private rented properties. Since 1 April 2020, landlords can no longer let or continue to let properties covered by the MEES Regulations if they have an Energy Performance Certificate (EPC) rating below E, unless they have a valid exemption in place. Government proposals have outlined plans to uplift the minimum standard to EPC rating C by 2030 with further consultation expected shortly.

Improving EPC ratings through measures such as insulation, solar panels and low-carbon heating achieves multiple outcomes:

- helping to reduce utility costs and tackle fuel poverty,
- reduce domestic carbon emissions and
- improve housing standards through addressing issues which can be linked to damp, mould and general disrepair.

The Council's Climate Change Service is available to assist both landlords and tenants to improve energy efficiency standards and reduce utility costs through practical advice and support with accessing available funding for insulation and heating measures. Landlords and tenants are also signposted to the Severn Wye Energy Agency, which works to reduce the number of people in fuel poverty and improve domestic warmth and wellbeing.

11 MAXIMISING USE OF EXISTING PRIVATE SECTOR STOCK

Our vision is to bring long term empty homes back into use to improve the quality and supply of housing and to enable our residents to fulfil their potential.

Empty homes represent a wasted resource and a missed opportunity which can have a negative impact on local communities. The problems associated with empty homes include:

- Denying a home to those in housing need.
- Causing damage to neighbouring properties.
- Affecting neighbouring house prices.
- Becoming a potential focal point for illegal activities and anti-social behaviour.
- Attracting fly tipping and vermin.
- Presenting a strain on other public services, including the Police and Fire Service.
- Presenting a risk to the public through unsafe structures.

Bringing empty homes back into use will support our communities by improving the local environment and the quality of life of local residents. It will provide much-needed accommodation for the private sector, easing the pressure for local residents wishing to remain in the area. By removing boarded up and problematic empty properties it will improve the visual appearance of an area and reduce antisocial behaviour and crime and help to make our communities more sustainable.

This will increase confidence in an area, encouraging investment in the repairs and renovation of properties, making our communities more sustainable. In order to effectively tackle the issue of empty homes the Council has produced its strategy to bring Long Term empty properties back into use and the PSH Strategy will be to support this and explore options available to reduce the number of empty homes in the area.

12 REGULATING THE PRIVATE SECTOR: THE HOUSING HEALTH AND SAFETY RATING SYSTEM (HHSRS)

The means of assessing housing standards, as per section 9 of the Housing Act 2004, is the Housing Health and Safety Rating System (HHSRS). Officers use it to risk rate the severity of a deficiency in a dwelling by determining how serious the health effect of that deficiency would be, on residents and potential visitors to the dwelling. Officers do all they can to educate, inform and encourage property owners and managing agents to fulfil their responsibilities. However, enforcement action to protect the health and safety of tenants, occupiers and others will sometimes be required.

The initiation of formal enforcement action will only occur when other measures have failed to produce the necessary response or where there is an urgent need for action. Upon consideration of all available evidence, the Council has a number of options to resolve a housing issue with these ranging from; taking no action, offering informal

advice, service of a statutory notice, issuing of a formal caution, carrying out works in default, service of a financial penalty (also known as a civil penalty) and in the most extreme cases, prosecution at Tribunal.

These courses of action are not necessarily mutually exclusive, and an act of enforcement could involve a number of these options. We work under the Council’s Enforcement Policy to ensure consistent and proportional legal action.

13 HOUSES IN MULTIPLE OCCUPATION (HMO’s - INCLUDING LICENSING)

Some privately rented houses are let to people from several different families, either as bedsits or as shared houses. Houses like this are known as houses in multiple occupation (HMOs). HMOs provide a valuable source of affordable rented housing to primarily single people in the area. However, this form of housing is often associated with deprived areas and can be problematic due to fire safety issues and poor standards such as dampness, lack of affordable heating etc. HMOs represent higher risk accommodation particularly when considering fire safety. For that reason, national legislation stipulates larger HMOs (housing 5 or more people) require a licence. The table below details the number of licensed HMOs, in comparison to the estimated number of non-licensable HMOs (data as of December 2024). HMOs that fall below the 5-person threshold are not required to be licensed. As such the number of HMOs across the Council’s area fluctuates on a regular basis. Throughout recent years there has been a growth in HMO accommodation. Officers are working proactively to identify HMOs in order to safeguard the occupiers. There are specific policies on HMOs that set out the fees for licensable HMOs, the licence period, and the Amenity Standards for HMOs.

Table 3

	Number of Licensable HMOs	Estimated total no of HMOs
Cotswold District	*25	**134

* October 2025

**District Wide Conditions Survey 2023.

14 CIVIL PENALTIES

Under the Housing and Planning Act 2016, financial penalties (also known as civil penalties) are able to be issued as an alternative to prosecution for relevant housing offences under section 249A of the Housing Act 2004. The maximum amount per offence

is capped at £30,000 although this is expected to increase to £70,000 under the Renters Reform Act.

A Civil Penalty Policy was first approved in 2018 and was renewed September 2025.

Officers will consider serving financial penalties where there is clear evidence of a relevant housing offence having been committed or with the conduct still occurring following the local housing authority's involvement.

The Crown Prosecution Service Code for Crown Prosecutors shall be consulted in conjunction with all local policies as well as the Enforcement Concordat as it provides advice on the extent to which there is likely to be sufficient evidence to secure a conviction. The Code has two stages the evidential stage and the public interest stage. There are seven factors to which the local housing authority will take into consideration upon service of a civil penalty and the 2025 Civil Penalties Policy outlines this in detail.

Banning orders for the most serious offenders, as well as a database of rogue landlords/property agents against whom a banning order has been made, are available to each Council and the provisions for these are being strengthened through the Renters Reform Bill. The database may include persons convicted of a banning order offence or who received two or more financial penalties within a twelve-month calendar period. The Council will adopt and enforce all necessary provisions in the keeping of a landlords database, making entries concerning rogue landlords when required, and considering the use of banning orders as part of its enforcement policy.

15 COLLABORATIVE WORKING

Due to the nature of the enforcement work carried out by the team, it is essential that the team works closely with colleagues from other internal services and external agencies, including Homelessness and Housing Options Teams who play a crucial role in assisting residents who find themselves homeless or in need of alternative accommodation. Due to the nature of enforcement work, there are occasions when residents may require assistance from the Homelessness/ Housing Options Team, such as when Emergency Prohibition Orders are served.

Neighbourhood and Community Safety officers work together to tackle a range of issues such as waste collection, fly tipping and anti-social behaviour. Police / Home Office / Fire and Rescue will regularly gain intelligence of multi-occupied, overcrowded and sub-standard properties within the area. Through information sharing agreements, officers from the Councils share and receive intelligence with the emergency services in relation to private sector accommodation. Immigration inspections to verify that the accommodation

being provided is suitable for those coming overseas. In addition, there is a need to verify tenure is lawful, for tenants to have the right to reside and recourse to public funds to begin with.

Health and wellbeing services are provided countywide in Gloucestershire, supporting adults across the counties to achieve confident, fulfilled and independent living. Many of the residents who request assistance from the PSH and Housing Teams may also need a helping hand through life's changes, such as ill health, disability, changes to financial circumstances.

DASH Services is a Private Rented Sector service for local authorities, landlords and tenants and is hosted by Derby City Council on behalf of numerous councils across England. The service has operated successfully for almost 20 years, providing a valuable, low cost, service for local authorities and a place for landlords to gain useful information to aid their businesses. The Council can work with DASH to provide landlord forums, newsletters and guidance on housing standards to private sector landlords and agents. In addition to their work with landlords, DASH can provide the Council with training for enforcement officers to ensure competence and consistency is achieved in the work that is being carried out.

Warm and Well provides a one-stop-shop for information and advice on all aspects of housing improvement, maintenance and repair to help people stay safe, warm and well at home. Funded by Councils, the service provides information and signposting to residents of all tenures as well as targeted advice and support. A range of services link across the County who have direct contact with households and connecting with organisations, both statutory and voluntary, that provide housing, health and wellbeing related services. The goal is to ensure residents receive the advice and support they need to help them live in warm, safe homes.

16 OUR COMMITMENTS

To develop this strategy, we considered several key areas in the private housing sector, on both a national and local scale, as well as the needs of the service. Our housing stock condition survey data, helps shape this further by identifying dwellings in the private sector and allocating them into categories, likely tenure, condition and household vulnerability of the stock and the geographical distribution of properties, which helps to understand the issues by tenure type across the sub-region. This helps to:

- establish the extent of dwellings suffering from the presence of a HHSRS Category 1 hazard,
- Energy Performance Certificate (EPC) rating bands,
- the number of empty homes across the sub-region, and

- a robust approach to mandatory HMO licensing.

From this we have developed four outcome-based commitments:

Commitment 1: to proactively and effectively tackle poor conditions across the private housing sector.

Commitment 2: to continue to work with partners, landlords and registered providers to ensure that homes meet required standards so that residents can thrive in a safe home;

Commitment 3: to support the Strategy to bring long term empty properties back into use to work effectively to reduce the number of empty homes;

Commitment 4: to tackle unlicensed HMOs.

WHAT DO THESE COMMITMENTS MEAN IN PRACTICE?

Commitment 1: *We proactively and effectively tackle poor conditions across the private housing sector.*

This commitment focuses on the development of our approach to regulating and improving conditions in the private housing sector within the sub-region. It is important that we build a robust approach to tackling rogue landlords and strive to ensure that the private sector offers a safe and suitable housing option for our residents.

To achieve this, we will:

- Take appropriate enforcement action when required, following our enforcement policy, that sets out how we will tackle rogue landlords and sub-standard property conditions.
- Work with landlords to identify and appropriately license all Houses in Multiple Occupation (HMOs) across the sub-region.
- Review our approach to supporting tenancy sustainment in the private rented sector.

Commitment 2: *We will continue to work with partners, landlords and registered providers to ensure that homes meet required standards so that residents can thrive in a safe home.*

It is important that we continue to build good relationships and education for tenants and landlords.

To achieve this, we will:

- Ensure the landlords Forum meets the needs of the landlords, by providing a wide range of advice, education from a variety of departments, agencies and local services.
- Continue to work with landlords to promote good housing management and to enable tenants to remain in their homes.
- Review the information provided on our website.
- Carry out consultation surveys with tenants and landlords to promote education and to ensure we are meeting customer satisfaction.

Commitment 3: *We will work effectively to reduce the number of empty homes across the three Councils.*

Working effectively to reduce the number of empty homes across the sub-region and bringing them back into use for the community will assist in addressing the local shortage of affordable residential properties. This will also reduce the detrimental impact that empty properties can have on the local area.

To achieve this, we will support the Long-Term Empty Properties Strategy 2024 to 2029 and Work in partnership with internal departments to ensure delivery of aims:

- Develop Support a strategic approach to identify and investigate empty homes throughout the sub-region both reactively and proactively.
- Engage with owners to encourage and support them in bringing empty homes back into use.
- Consider rent schemes, grant programmes and other available options to assist owners in bringing empty homes back into use.
- Take appropriate enforcement action when required in support of the Strategy.

Commitment 4: *We will tackle unlicensed HMOs across the three Councils.*

Tackling unlicensed HMOs across the sub-region to proactively ensure landlords are meeting the minimum housing standards, fire safety and management standards will ensure that this type of housing is always a safe option for those needing an affordable home of their own.

To achieve this, we will:

- Carry out proactive project work, including partnership working with other departments across the Council and external partners, to identify and investigate all suspected HMOs across the district.

- Target enforcement work towards non-compliant landlords.
- Encourage landlords to obtain accreditation to ensure good management standards and an understanding of legislation.

17 DELIVERY

The Council has developed a Houses in Multiple Occupation Licensing Policy. The policy covers how the Council will apply the relevant legislation to applications for licences for Houses of Multiple Occupation to ensure that all actions undertaken are fair, equitable and consistent.

The Council will explore options available to reduce the number of long term empty homes across the sub-region. The policy will identify the approaches available along with the resources required to tackle the issue of empty homes.

The Council will report on its performance regularly particularly against the emerging central government indicators, but also on indicators developed locally to ensure what matters is measured.

With the introduction of the Renters Rights Act 2025, this strategy will be reviewed after one year of operation to ensure the strategy meets the needs of the district and the requirements of the Government.

18 REVIEW PERIOD

The policy will be reviewed within twelve months to accommodate the changes to be introduced by the Renters Reform Act 2025, and thereafter, every three years.