

PRS 03

Ymgynghoriad ar y sector rhentu preifat

Consultation on the private rented sector

Ymateb gan: Cyngor ar Bopeth Cymru

Response from: Citizens Advice Cymru

Left in the cold: how to protect private renters in Wales from cold, damp homes

Private renters in Wales continue to have problems with cold, damp and mouldy homes, driven by the poor energy efficiency of homes in the private rented sector.

At a time when many renters are struggling to keep their heads above water, with record rises in energy bills and rent, the average tenant is facing annual energy bills that are £350 more expensive due to poor insulation.

Whilst new regulations strengthen the requirements for privately rented homes in Wales to be 'fit for human habitation', many continue to live in poorly insulated homes. Improving the energy efficiency of homes must be a priority in order to bring renters in Wales in from the cold.

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Our latest analysis found that¹:



1 in 4 (28%) private renters in Wales feel **unable to heat their home** to a comfortable temperature.



7 in 10 (70%) private renters have experienced **excessive cold, damp or mould** in their privately rented home



Renters in a home with an EPC of D or below are **73% more likely** to have experienced damp



1 in 5 (21%) of those who didn't complain to their landlord said this was because they were **worried about eviction**

Homes with a low EPC rating cost more to heat

The energy efficiency of a property has a significant impact on the cost of keeping it warm.

Two thirds (66%) of all privately rented homes in Wales have an EPC rating of D or below.² The average home, with an EPC D, costs £350 a year more on energy bills than homes with an EPC C, with those in homes below a D losing as much as £950³ compared to homes with an EPC C.

- **40%** of those who've experienced cold, damp or mould **felt this had increased their energy bills**
- **12%** said it had increased their energy bills to the extent **they've fallen into debt**

Private renters are one of the groups hit hardest during the cost of living crisis, with 10% in Wales saying they are behind on their energy bills compared to 6% of homeowners.⁴

At a time when all bills are rising, this adds further pressure to people's budgets and makes it harder for them to keep their homes warm.

The damp problem

Renters in inefficient homes are also more likely to experience problems with damp and mould. These problems are considered 'category 1' environmental health hazards, yet remain widespread in the private rented sector.⁵

In Wales, **43% of private renters said they've experienced damp** in their privately rented home (rising to 53% of those living in EPC D-G rated homes) and **52% said they had experienced mould** (67% of those living in EPC D-G rated homes).

This has serious consequences for the health and wellbeing of renters.

- 42% say they have felt **stressed as a result of damp, mould and excessive cold**
- 42% said it made them feel **anxious**
- 13% said they spent **less time at home**
- 11% said it had made their **respiratory illness worse**

Improving Minimum Energy Efficiency Standards

Minimum Energy Efficiency Standards require all landlords in England and Wales to provide their tenants with an EPC and all rental properties to be at least EPC E, unless exempt (costing more than £3,500 to upgrade to EPC E).⁶ While existing regulations have helped improve the energy efficiency of some homes, renters in EPC E properties are still paying nearly £850 more than tenants in more efficient properties.⁷ **The average cost to upgrade a home to EPC C is £3,800, but some homes that need more expensive improvements such as solid wall insulation or double glazing will be significantly more.**⁸ Our previous research showed that half of landlords would not spend more than £1,000 out of pocket to improve the energy efficiency of their properties, meaning there is a risk that without action, renters won't see the changes needed.⁹

An evaluation of these current standards also found that landlords did not believe that enforcement action would be taken against them if they were breaking the rules.¹⁰ This is shown in our latest data, with 2 in 5 (38%) tenants in Wales saying their landlord did not provide them with an EPC, despite it being a legal requirement.



38% of private tenants in Wales said their landlord did not provide them with an EPC



The average cost to upgrade a home to EPC C is **£3,800**

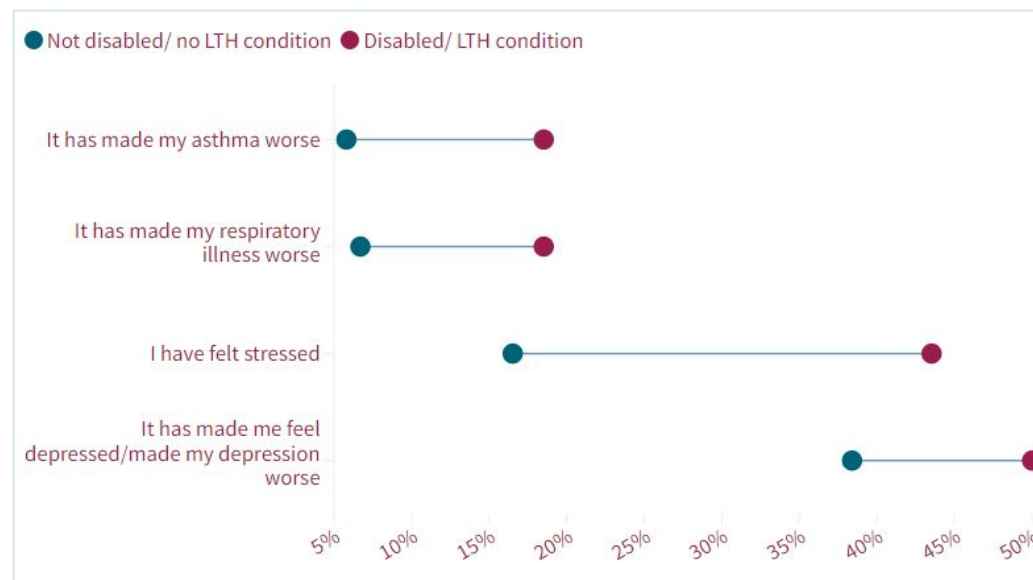
Fear of eviction can stop people from complaining

Nearly 30% of those who have experienced damp, mould or excessive cold in their home did not complain to their landlord about the issue and most did not complain to their local authority (83%). **Of those who did not complain to their landlord, 1 in 5 (21%) said this was because they were afraid of being evicted.** Whilst the implementation of the Renting Homes Wales Act (2016) ensures new contract holders get 6 months notice when issued with a 'no-fault' notice, these findings suggest security of housing remains a significant concern when deciding whether to raise issues. Other reasons given for not complaining included believing it wouldn't change anything (42%) and being worried about rent increases (25%).

Poor housing has serious impact on the health and wellbeing of renters

We found that disabled people and people with a long-term health condition were more likely to have experienced cold, damp or mould in their privately rented home, with more than three quarters (77%) of disabled people saying they had experienced these types of problems, compared to 68% of those who are not disabled.

People who are disabled or living with a long-term health condition were also more likely to have seen their health or wellbeing worsen as a result, such as impacting on their mental health or exacerbating respiratory illnesses.



People who reported being disabled or living with a long-term health condition were more likely to say that cold, damp or mould had a negative impact on their health or wellbeing.

Laura's story

Laura lives in South Wales and has a teenage son. The privately rented property she lives in has ongoing problems with black mould which has become so severe that she can no longer use all the rooms in the house and her son has had to go and stay with relatives. Laura also has multiple health issues, which she feels have been exacerbated by the poor conditions of the house.

Laura has raised the issue of the mould with her landlord but they have taken no action to remedy the problem. She has been issued with a 'no-fault' eviction notice and she feels that this is in reaction to her complaint. She has a low income and is currently on the waiting list for housing with her local authority but currently has no alternative accommodation.



Bringing the private rented sector in from the cold

Renters are being squeezed on all sides by record increases in energy bills and rental costs. Energy efficiency improvements can slash bills and prevent problems with damp and mould. Taking action on inefficient homes has also been shown to have wider public cost-savings, particularly in relation to households with additional vulnerabilities where the health impact of a cold home can be exacerbated.¹¹ Action is needed from both the Welsh and UK governments to deal with the problem of poor standards in the private rented sector.

We're calling on the Welsh Government to:

- Welsh Government should help raise awareness of funding that is available for tenants and landlords to carry out energy efficiency measures and the benefits of energy efficiency with a consumer awareness campaign
- Welsh Government should ensure insulation and other fabric improvements become the cornerstone of the next iteration of the Warm Homes Programme and that the scheme utilises all funding sources to maximise benefit to eligible tenants and landlords
- Welsh Government should explore finance options for the 'able to pay' market, including landlords, by fast-tracking proposals to develop and trial alternative finance products to support owner occupiers to retrofit.

We're calling on the UK Government to:

- Implement the government recommendation to raise the cap on costs to landlords to make upgrades from £3,500 to £10,000
- Strengthen Minimum Energy Efficiency Standards in legislation, so all private rented properties reach EPC C by 2025
- Kickstart the market for green finance to help landlords cover the costs of retrofitting their properties, through low interest loans and green mortgages

1. Unless otherwise stated, figures are from an online survey of 2000 private renters, including 484 respondents living in Wales. The results for Wales are unweighted. Yonder Solutions, 23-27 February 2023, 2. Rent Smart Wales, [Energy Performance Dashboard](#), 2023, 3. Citizens Advice, [Insulation Nation: The roadmap to a future of affordable energy bills](#), 21 September 2022, 4. Online Survey of 6000 UK adults, including 520 people in Wales, Walnut Unlimited, December - January 2023. 5. Shelter, [Health and Safety standards for rented homes \(HHSRS\)](#), 18 July 2022, 6. [www.gov.uk, Domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK](#) 7. Citizens Advice, analysis based on Insulation Nation the roadmap to a future of affordable energy bills, 21 September 2022, 8. [www.parliament.uk, Energy Efficiency of Existing Homes](#), 22 March 2021, 9. Online survey of 2002 people, Public First, 21-25 Oct, 10. Department for Business, Energy & Industrial strategy, [Domestic private rental sector minimum energy efficiency standards: interim evaluation 2020](#), 17 March 2021., 11. Public Health Wales, [Making a Difference Housing and Health: A Case for Investment](#), 2019, 12. The full report for England and Wales accessed here: [Damp, cold and full of mould - Citizens Advice](#).