

DRAFT

EMPTY HOMES STRATEGY – GUIDE TO ENFORCED SALES OF EMPTY HOMES

READING BOROUGH COUNCIL

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DRAFT

PURPOSE/ SCOPE

This guidance sets out why and how the Council may use Enforced Sales to recover debts registered as charges on empty homes and so assist with bringing empty homes back into use.

POLICY BACKGROUND

The Enforced Sales Procedure (ESP) allows the Council to recover charges it has registered against an empty home by forcing the sale of the home. It is used as a means to “sell on” a long-term vacant house to a new owner, in circumstances where the present owner is either unwilling or unable to deal with the house and its associated problems.

As with Compulsory Purchase Orders (CPO), it should only be used as a last resort and can only be used in particular circumstances.

In order for a property to be considered suitable for ESP under this procedure, it must satisfy the following ESP conditions.

- A. The property is a vacant dwelling.**
- B. A debt is created by the Council carrying out works in default of a statutory notice.**
- C. The debt is registered on Part 2 of the Local Land Charges Registry**
- D. The total debt on the property owing to the Council should exceed £500.**
- E. The proprietor shows no commitment to bringing the property back into use and/or to settle his debt with the Council.**

ESP does not bring an empty home straight back into use but forces a change of ownership. The new owner is more likely to invest in the property and ensure its likely reoccupation.

The strategic reasons for using ESP are set out in the Reading’s Empty Homes Strategy.

IDENTIFYING AND PRIORITISING EMPTY HOMES

The Empty Homes Strategy and associated guidance notes set out how the Council identifies empty homes and engages owners. Our approach involves a mix of the following steps:

- Identify and assess the empty home
- Trace and contact the owner

- Offer help to bring the home back into use
- Gather and collate evidence
- Take formal action to remedy problems with the home
- Take formal action that may lead to a change of ownership/occupation of homes. Such action includes Compulsory Purchase, Empty Dwelling Management Orders or Enforced Sales. These would only be used in cases where negotiation/informal methods have failed due to the owner being unwilling or unable to re-use the home.

Any privately owned empty home could be subject to ESP. However, in the context of the Council Enforcement Policies and the Empty Homes Strategy, ESP is to be used only for the most problematic empty homes after other efforts have been exhausted.

A home can be proved to be empty by visiting the property, through confirmation by the owner, and a search of Council Tax records.

Once a property is confirmed as empty for the qualifying period, **ESP Condition A** is met. However, one must be aware that the property could be brought back into use without the Council knowing, thus subsequent checks on the empty status of the home should be made.

The Empty Homes Officer gathers information and inspects empty homes. The Empty Home Priority Score combines the weighted factors below.

RISK FACTOR	WEIGHTING
Property size and type	10%
Location, prominence	15%
length of time the property has been vacant	15%
Impact on the local neighbourhood and neighbours	30%
Traceability and responsiveness of owner	20%
Potential to generate housing units	10%

Final scores will influence the timescales for and the balance of informal/formal Council action. High scores trigger a quick inspection and may indicate that formal action is likely to be needed. A high score does not necessarily mean that the Council will use the ESP.

The Risk Matrix and Priority Score gives accountability to the choice of candidate properties for formal action, including ESP. Thus the use of ESP can be controlled, taking account of the relative benefits of dealing with one home against another and of the available staff resources. The Priority score also helps to manage people’s expectations of the Empty Homes Strategy.

Individual property records are held on the FLARE property database in Regulatory Services, in hard copy files and the shared S-drive.

SERVICE OF NOTICE.

All enforcement action is taken in line with the Council's Corporate Enforcement Policy 2012. Service of Notice should be considered if a home presents health and safety or environmental risks or hazards, or if it is in a condition that is detrimental to amenity. Consideration must be given to the aspirations of the owner, but the word of some owners of the most problematic properties should be treated with caution.

The choice of Notice and decision to serve is based on the risks presented by the empty home and not simply to suit a potential ESP case. The threat of formal action may be enough to persuade the owner to take their responsibilities of property ownership more seriously.

Appendix X shows the statutory notices that are used as part of the Empty Homes Strategy and where debt from Works in Default can be registered in Part 2 of the Local Land Charge Register.

The recipient of the Notice is determined from information held on the Land Registry backed up with information gathered using request for information or documents Notices.

WORKS IN DEFAULT

If an owner does not comply with certain Notices, the Council may carry out the works in default and charge the owner costs including reasonable legal and administrative costs. A debt arises once an owner fails to pay the Council invoice. **ESP Condition B is therefore met.**

ESP cannot be used once the debt has been settled. The Council would therefore consider using Compulsory Purchase or a Management Order to bring the home back into use.

LOCAL LAND CHARGES

ESP Condition C is met once debt is registered on the Local Land Charges Register.

ESP Condition D is met if the registered debt exceeds £500. Checks should be made with Council Tax on any potential Council Tax arrears that might be added to the debt.

The Empty Homes Officer will have compiled case notes that will illustrate the owner's levels of non-cooperation and non-compliance. Examples of non-cooperation include:

- Refusing to engage with the Council.
- Failing to provide plans to bring the home back into use.
- Non-attendance at appointments.
- Failure to provide information requested either informally or under Notice.
- Refusing access to the property.
- Absenteeism.
- The need for the Council to take enforcement action.

ESP Condition E is often met with any case that has required enforcement action and is always met on non-compliance with a notice and failure to pay for works within 30 days of first invoice.

The Council can now decide whether to pursue ESP. The next steps are to confirm the validity of the debts and charges, obtain authorisation from the Director of Environment and Neighbourhoods to pursue ESP, and instruct Legal Services.

Checks should be made of information systems in Environmental Health, Building Control, Planning Enforcement, StreetCare and Highways. The status of Local Land Charge debts should be confirmed with the Land Charges Team and a check of the Land Registry.

1. Is the debt correctly registered as a Local Land Charge? Note that debts arising from Works in Default carried out under certain notices are only Contract Debts and are not registerable as a Local Land Charge.
2. Has the charge period expired? Each Statute allows for charges to remain recoverable for a fixed period – check the Statute in question and effect of Limitations Acts on debts raised under that Statute.
3. Were Notices served correctly?
4. Are original copy Notices held on file and available for copying?
5. What attempts have been made to recover the debts? Has the debt been settled?
6. Can compound interest be charged on the charge?
7. Does the statute under which the Notice was served “confer a charge on all estates and interests in the property concerned and also confer Law of Property rights?

While all 7 questions above are crucial to the success of ESP, Question 7 is paramount. **Does the statute under which works were carried out in default confer the powers and rights needed to allow the use of ESP?**

If the statute confers a charge on all estates and interests in the property concerned AND also confers Law of Property rights and powers, ESP may be used.

If the statute does not bind all estates and interests or does not confer Law of Property rights, section 7 of the Local Land Charges Act 1975 might be used to recover the debt. This allows the use of ESP, but is limited in that only the estate of the debtor is bound and not all the estates or interests of other parties. The Local Land Charges Act 1975 is not as effective a recovery mechanism nor as a means to encourage re-use of the home as LPA 1925.

If the statute(s) does not confer powers and rights under Law of Property Act 1925 and the Local Land Charges Act 1975, ESP cannot be used.

Empty Homes Officer will prepare and submit the empty home case file to Legal Services to advise on the appropriateness and viability of ESP. The case file must include:

- Property Address
- Name of Current Owner and Address (as per Land Registry)
- Details of each Notice served on which debt is still outstanding. Legislation, Act and Section.
- Proof of Service form
- Date of Service
- Full Name and Address of Person(s) on whom Notice served
- Description of Works Required
- Details of Outstanding Debts created by Works in Default
- Dates Works Carried Out (start & finish dates if known)
- Cost of Works
- Date registered in Part 2 of the Local Land Charge Register
- Copies of any relevant correspondence sent to, or received from, the Owner

Because of prior involvement in cases that may lead to ESP, Legal Services checks will mainly focus on the probity of outstanding charges.

If all ESP Conditions are met, and if all the answers to Questions at point **XX** are good, it is good practice to re-serve the original Notices (both enforcement and demands for payment) as a clear warning that the Council intends to recover costs. Notices must be served on all parties with an interest in the property. Legal Services should also notify the Land Registry of the proposal to use the Law of Property Act to recover the debt.

Even though some Statutes do not permit entry in the Local Land Charges Register, the debt might still be recovered if the property is sold using ESP pursuant of a qualifying statute.

Council Tax debts are personal rather than property based and can neither be registered nor recovered through this process. The Local Tax Recovery Team may be taking action against an owner to recover their debt. Forced sales by Local Tax Recovery and by the Empty Homes Strategy are not mutually exclusive, but both teams should coordinate efforts to maximize the level of recovery. Cases should be discussed with David Colegrove, Legal Services Manager.

LEGAL SERVICES AND THE ENFORCED SALES PROCEDURE

This section is a basic guide to ESP for staff working on empty homes who do not work within Legal Services. In the main, Legal Services carry out the ESP steps.

ESP is used where there is an outstanding financial Charge registered in Part 2 of the Local Land Charges Register. This gives the Council the power to enforce that Charge because the Council has all the powers and rights available to a mortgagee under the Law of Property Act 1925.

Section 7 of the Local Land Charges Act 1975, provides that a financial Local Land Charge takes effect, as if it had been created by a Deed of Charge within the meaning of the Law of Property Act 1925.

Section 101(i) of the Law of Property Act 1925, confers on a mortgagee a power of sale. An Order of the Court is not necessary as the legislation itself provides that power.

Section 87(1) of the Law of Property Act 1925, confers a right of possession. In addition, many of the statutes used by the Council, which result in carrying out Work in Default, give to the Council a power of sale and a right of priority over other Charges.

Table XX below sets out key stages in the legal process of forcing sale

1	Enforcement Team	Reissue original Notices and Invoices.
2	Enforcement Team/Debt Recovery	If no payment within 30 days, issue final 5-day demand and notify Legal Services.
3	Enforcement Team/Debt Recovery	If no payment within 5 days, standard letter to owner/interested parties stating that all further correspondence should be addressed to the Borough Solicitor.

4	Legal Services	Serve section 103(1) Demand Notice requiring payment of debt within 28 days. Owner must make payment with the agreement of the Borough Solicitor.
5	Legal Services	If payment is still not made 3 months after service of S.103(1) Notice and Demand, write to the Owner and any other interested party of intention to recover debts by selling the property. Copy all records to Empty Homes Officer.
6	Legal Services	Letters to Owner and Chargees requesting deeds.
7	Empty Homes Officer	Prepare ESP authorization form and submit to Head of Service for decision to proceed.
8	Director (Environment and Neighbourhood Services)	Authorises use of ESP and instructs Borough Solicitor. Suspend all other debt recovery.
9	Legal Services	List all Works in Default charges. Assess correct service of Notice and validity of charges.
10	Legal Services	Write to owner and interested parties to confirm outstanding charges, giving notice of intent to force sale and request Deeds. Allow 21-day response time then register charges against title.
11	Legal Services	Apply to register charges with the Land Registry
12	Legal Services	On receipt of Charge Certificate, send letter to owner/mortgagee of intent to sell.

REGISTRATION OF CHARGES WITH THE LAND REGISTRY.

The debt as a Local Land Charge will be registered as a charge on the property and will be entered on the Title to the property at the Land Registry.

If no-one responds to the letter of intention to pursue the ESP (step 3 above), the Council can apply to the Land Registry for registration of the Charge, claiming priority over all other Charges.

The Land Registry require the following papers, which would be prepared by Legal Services:

1. Sealed Resolution of the Council with certified copy.
2. Form AP1 – Application to change the Register with the appropriate fee
3. Form SC – Application for noting the overriding priority of a statutory charge
4. Certificate as to the value of the Charge (unless stated in the resolution)

The Resolution of the Council mentioned at 1 above provides:

- The statutory provisions used to take enforcement action, to recover debts, to register a Local Land Charge.
- Proof of service of notices.
- The Schedule of works, works order and bill of works.
- The list of Local Land Charges, with particular attention to those charges that confer Law of Property Act rights and powers.
- A certificate by the Council that the Council has the rights and powers to make the application for registration of the charges.
- Confirmation that the Council has taken all the above steps in accordance with the statutory provisions at point 1.

Once the Charge is registered at the Land Registry, the property can be marketed for sale. Further letters are sent to the Owner and other interested parties to warn them the Council is now fully prepared to sell the property.

The Council must consider the provisions of the Human Rights Act 1998 when considering a forced sale. A balance must be struck between the rights of the owner and of the wider community. The rights of the owner can be found at Part 1, Article 8 “the right to respect for... private and family life..., home and... correspondence”, and Protocol 1, Article 1 “peaceful enjoyment of... possessions”. Letters to Owners and Chargees should include a statement that the intended action of the Council in exercising its power of sale is considered to be proportionate and in accordance with the Act.

If the property is unregistered at the Land Registry, the Council cannot apply to be registered as mortgagee though Enforced Sale can still be used. The buyer would apply for the First Registration when the ESP property is sold.

The extent of the property bound by the charge and that can be sold is ascertained by applying the facts to each case, and the particular statutory provisions that have given rise to the Local Land Charge. The position is clear in the case of Charges which arise under the following legislation.

- Public Health Act 1936 Sec 291
- Prevention of Damage by Pests Act 1949
- Building Act 1984 Sec 107

It does not matter, in either scenario, whether the property then subsequently changes ownership. Once the Charge against the property is established, the land continues to be subject to the Charge even if it has passed to subsequent (possibly entirely innocent) owners.

Care must be taken when using ESP to recover debts arising from action under the Environmental Protection Act 1990. The debt may only be recovered from the original recipient of the Environmental Protection Act Notice. Where the statutory charge binds all the estates and interests in the property, any registered charges will be of no great significance other than for the purposes of giving notice to any charging as to the Council's intentions. Where this is not the case it is critical to ascertain if any prior charges affect the property. If the statutory charge does not bind all the estates and interest, it would probably be inadvisable to proceed with the ESP unless it is certain there are no prior charges and the statutory charge binds the freehold or a long-leasehold.

The Limitation Act provides that any debts over 12 years old (generally from the date when the expense was incurred) are no longer recoverable. Attempts to recover debts through Local Land Charges or by using ESP are not permissible after this time has passed.

ESP AND READING BOROUGH COUNCIL GRANTS OR LOANS.

Some empty homes will have been awarded Empty Home Grants or Loans. The award of such assistance is subject to Conditions set out in the Private Sector Renewal Policy.

The award of a grant or loan normally indicates that the owner is working with the Council. However, one must be alert to the sort of owner who is awarded a grant or loan, yet decides to leave the property vacant. The loan/grant secured as a charge against the property would therefore be repayable because the owner had breached grant conditions. The Council would take action to recover such a charge through normal debt recovery procedures.

INSTIGATING SALE

Some ESP properties will fall out of the process before sale because they have become occupied, been sold or the owner has settled the qualifying debt. If the debt is paid but there appears to be no other positive progress, Compulsory Purchase Order (CPO) action may be considered as being the only appropriate alternative course of action.

Close liaison and co-operation needs to be maintained with Legal Services throughout the pursuance of ESP. The property can be marketed for sale once the Land Registry has issued the Charge Certificate to Legal Services.

MARKETING AND SALE

The Council has a duty to secure the best possible price on sale. Marketing techniques must be sufficiently wide to ensure that a proper competitive bidding process takes place. Failure to be able to demonstrate this could mean the Council being legitimately challenged by the Owner (whether currently known or not), at a later date.

Whatever the preferred method of sale, the same rules apply to a sale under the ESP as to any other sale of a property by a mortgagee. Auction or sealed offers with a guide price will be considered to be the most expedient method of disposal and generally a mortgagee can accept the highest bid for a property described and advertised in a properly published auction. This will be carried out by the Valuations Team, who will also carry out valuation.

Ward councilors and concerned neighbours should be kept informed of progress.

As the Council at no time takes possession of the ESP property, it has no more rights of access than it does for other private houses. So, whilst the Council may exercise its legitimate Powers of Entry from time to time, using the proper procedures, it is neither able to permit viewings of the property to potential purchasers nor has power to put up "For Sale" signs.

As access cannot be gained, there is no requirement to complete a Void Property Form or carry out a risk assessment.

One of the intentions of ESP is to try and change ownership of the property in a positive way. But, as viewings are not permissible, it seems unlikely that many potential owner-occupiers are likely to outbid private landlords, due to the level of risk involved.

Members of the Landlord Accreditation Scheme will be informed of the availability of a property so as to increase the scope of marketing to known responsible landlords. The letter can include photographs and marketing material, and details of how to make further enquiries and put in a bid. This function is dealt with by the Empty Homes Officer.

The Empty Homes Officer must check and take photographs of the property throughout the ESP process. This is most important immediately prior to the sale date. The Council must be alert to signs of occupation and should check with neighbours that the property remains vacant.

If the property is unregistered, there may be no Deeds or details of encumbrances affecting the property. On completion of sale the Council must provide a letter to the Land Registry certifying that they have the necessary rights and powers to dispose of the property.

CONTRACT

The contract for sale will be the same as any contract for sale by a mortgagee if one is disposing of a registered property.

For unregistered properties, the form of the resolution prepared in respect of registered land is incorporated into the contract as a recital. The Council needs to state where the Council's power to sell the property comes from.

On completion of sale the Council must provide the Land Registry with a letter of proof that the Council has all the necessary rights and powers to dispose of the property and that it has taken out all appropriate steps in accordance with the statute(s) in question.

The purchaser's solicitor will need to submit the letter of proof to the Land Registry along with their client's application for first registration.

DISTRIBUTION OF PROCEEDS FROM THE SALE

If the proceeds of sale do not cover the debt, the Council will pursue the original owner to settle the debt through normal debt recovery proceedings.

The costs of selling the property and debts are deducted from the proceeds of the sale. If the debts are greater than the proceeds of the sale, consider whether the fees are to have first call on the proceeds or not. The auctioneers fees would have to be paid in all events.

Where the proceeds do not cover the total costs of the sale and the outstanding debt (including interest), the remaining debt is taken off the property and placed against the owner after the sale. This then takes the form of a personal debt.

If there are any balance proceeds of the sale, if the Council is aware of the owner(s) whereabouts, the balance is paid over in the usual way.

If the whereabouts of the owner is unknown, the money can be paid into court where the money can be held against the property in an interest bearing account. This is held for a period of 12 years, thereafter the Council is free to allocate such money as it pleases.

Appendix 1 - ENFORCED SALES PROCEDURE - LETTER 1

According to our records, the above property for which I believe you are the owner is still unoccupied and has been for a considerable period of time.

As you may appreciate void properties can often lead to social problems in the locality, as they become targets for vandalism and havens for anti-social behaviour. They are also a wasted resource for their owners and for the community.

I am currently considering options for bringing the above property back into use. One option is to use the Enforced Sales Procedure. The Enforced Sales Procedure allows Local Authorities the opportunity to bring empty properties back into use as well as enabling them to recover any debts that may be owed to them. The power which dates back to the **Law of Property Act 1925** provides Local Authorities the power to sell properties in order to release the money tied up in the value of the property.

At this stage, I have not reached a conclusion as to the best course of action with regards to this. I ask you to contact me as a matter of urgency to advise me what you intend to do to bring the property back into use.

Appendix 2 - ENFORCED SALES PROCEDURE - LETTER 2

Further to previous correspondence, I am extremely disappointed to find that the above property is still empty and there has been no or very little progress in bringing this property back into its proper use.

I must remind you that the Council is committed to working with owners to resolve the issues around empty properties and at a time when housing supply is in such demand, we cannot allow properties to fall in decline.

Unless I hear to the contrary within 28 days, I will assume that you still have no definite proposals to bring the property back into use.

In this event, I shall have no option but to review the position with regards to submitting a report to the appropriate committee recommending that the Council acquire the property by using the Enforced Sales Procedure. It is still possible to discuss this matter with me in order to prevent any further action being taken.

Appendix 3 - ENFORCED SALES PROCEDURE - LETTER 3

I refer to my previous correspondence and assume in the absence of a reply that you still do not have any proposals for the comprehensive improvement of the above property.

Therefore, I am writing to inform you that I have submitted a report to the relevant committee recommending that Reading Borough Council acquire the property using the Enforced Sales Procedure.

As mentioned in my previous letter, even at this late stage the Council would prefer to see the property improved to a satisfactory standard and be property managed and maintained on a voluntary basis. If you have any firm proposals in this respect, it is essential that you inform me.

APPENDIX 4 - Notice which should be served under Section 81A of the Environmental Protection Act 1990 and Section 103 of the Law of Property Act 1925.

I have examined the provisions of Section 81A of the Environmental Protection Act 1990 and a Notice served under this section shall:

- (a) specify the amount of expenses that the Local Authority claims is recoverable;
- (b) state that the expenses shall carry interest and the rate of interest determined by the Local Authority;
- (c) the expenses shall carry interest from the date of service of the Notice until the whole amount is paid;
- (d) state the accrued interest shall be a charge on the premises as from the end of a period of 21 days beginning with the date of service of the Notice or where an appeal is lodged to the Notice interest accrues from the final determination of the appeal.
- (e) stipulate that a person served with a copy of the Notice may appeal against it to the County Court within the period of 21 days beginning with the date of service.

In respect of Section 103 of the Law of Property Act 1925, the Council shall not exercise its power of sale conferred by that Act unless and until it has given notice. The notice simply requires the Council to state in the following terms:

Notice requiring payment of the money has been served on the owner and default has been made in payment of the mortgage money, or a part thereof for 3 months.

(Note that the matters above need to be incorporated into correspondence as there is no Prescribed Form for service of this Notice)

Appendix 5 - Charges Form

Address of property:.....

Charges registered in Part 2 of the Register of Local Land Charges as at <DATE>

Date registered in Part 2	Amount of charge	To be registered against title (Yes or No)

Appendix 6 - Letter to First Mortgagee (Registered Property)

Dear Sirs

Premise Address:.....

Your charge dated:.....

I am aware from the contents of the registers of title number [], which relates to the above property, that you have a charge registered against the same. That charge is dated [] and the owner of the property is shown to be [].

The Council has, pursuant to its statutory powers, carried out certain works to the above premises, the costs of which have been registered in Part 2 of the Register of Local Land Charges as financial charges.

The statutes pursuant to which the Council has carried out such works confer, in favour of the Council, a charge on the premises and all estates and interests therein and the Council has, for the purposes of enforcing the charge, all the same powers and remedies under the Law of Property Act 1925, and otherwise as if it were a mortgagee by deed having powers of sale of lease of accepting surrenders of leases and of appointing a Receiver. The said statutes confer a priority on the Council's charge over your own charge and therefore when registered the Council will be the first chargee.

The Council proposes, pursuant to its statutory powers, to register the financial charges against the title to the property. Thereafter the Council may exercise its power of sale over the property and apply the proceeds of sale towards the discharge of the debt due to the Council.

If you wish to repay the outstanding debt due to the Council, I can provide details of the outstanding amount. Otherwise I would be grateful if you could forward all the title deeds and documents in your possession that relate to the above property. If you do not have the deeds and documents in your possession, please advise me of the whereabouts of the deeds.

Appendix 7 - Letter to owner (Registered Property)

Dear Sirs

Premise Address:.....

The Council has, pursuant to its statutory powers, carried out certain works to the above premises, the costs of which have been registered in Part 2 of the Register of Local Land Charges as financial charges. Notice(s) detailing the works and the costs have been served together with Notice(s) of demand for payment of the amount(s) due to the Council in order to satisfy the requirements of Section 103(1) of the Law of Property Act 1925.

The statutes pursuant to which the Council has carried out such works confer, in favour of the Council, a charge on the premises and all estates and interests therein and the Council has, for the purposes of enforcing the charge, all the same powers and remedies under the Law of Property Act 1925, and otherwise as if it were a mortgagee by deed having powers of sale of lease of accepting surrenders of leases and of appointing a Receiver.

The Council proposes, pursuant to its statutory powers, to register the said financial charges against the title to the above premises. Once the charge(s) have been registered the Council may then sell the premises and apply the proceeds of sale towards the discharge of the debt. However, if the debt is greater than the proceeds of sale on any sale received the Council has the right to pursue you for any balance owing, if necessary by legal action.

I will be grateful if you would make arrangements through me for the discharge of the outstanding debt. If you are not prepared to do this then please forward to me all the deeds in your possession relating to the above property. If they are not in your possession, please notify me and advise me of the whereabouts of the deeds.

If I fail to hear from you within 28 days from the date hereof, I will proceed to register the Council's charges against your title to the above premises.

Appendix 8 - Notices and Charges used in the Enforced Sales Procedure

STATUTE	PRIORITY CHARGE	DOES INTEREST ACCRUE?
Public Health Act 1936. S45 (works to closets) & S83 (filthy or verminous)	YES	YES
Local Government (Miscellaneous Provisions) Act 1976. S33 (restore services) & S35 (private sewer)	YES	NO
Local Government (Miscellaneous Provisions) Act 1982 S27 (drains) & S29 (boarding up)	NO	NO
Highways Act 1980 S154 (hedges, trees) & S165 (unfenced land)	YES	NO
Building Act 1984 S59 (drainage), S60 (soil pipes), S76 (defective premises), Ss 77/78 (dangerous buildings), S79 dilapidated building & S84 (yards)	YES	NO
Housing Act 2004 Ss 11/12 (improvement), S40(2) (emergency remedial action), Ss49/50 (recovery of charges for enforcement action)	YES	YES
Town & Country Planning Act 1990 S215 (land condition)	NO	NO
Environmental Protection Act 1990 S80 (statutory nuisance)	YES	YES
Prevention of Damage by Pests Act 1949 S4 (rats and mice)	YES	YES