

Strategic Housing Policy

Summary and Recommendations

This report provides the Community Wellbeing Board with an update on the Housing to 2040 Strategic Advisory Board (SAB), as well as on COSLA's Housing Special Interest Group (SIG). In addition, the paper seeks the views of members to inform COSLA's oral evidence to the Parliament's Local Government, Housing and Planning Committee on 20 February, as well as our response to the Social Housing Net Zero Standards (SHNZS) consultation.

This paper invites members to:

- i. Note that a Housing to 2040 (SAB) workshop will have taken place on 8 February and a copy of COSLA's pre-workshop submission is outlined in Annex 1;
- ii. Note the draft note of the first Housing SIG meeting in Annex 2;
- iii. Note that Cllr Chalmers, COSLA will be providing oral evidence to the Parliament's Local Govt, Housing and Planning Committee on 20 February on Housing to 2040 and a copy of our written evidence is in Annex 3;
- iv. Provide views on the Housing to 2040 Strategy, in particular the impact of the Affordable Housing Supply Programme (AHSP) budget cut; and
- v. Provide any initial views on the Scottish Govt's proposed Social Housing Net Zero Standard (SHNZS) consultation.

References

Previous reports:

- 23-12-08 Housing to 2040 and Housing SIG
- 23-10-20 Solace Housing Report

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Strategic Housing Policy

Purpose

1. This report provides the Community Wellbeing Board with an update on the Housing to 2040 Strategic Advisory Board (SAB), as well as on COSLA's Housing Special Interest Group (SIG). In addition, the paper seeks the views of members to inform COSLA's oral evidence to the Scottish Parliament's Local Government, Housing and Planning Committee on 20 February, as well as initial views on the Social Housing Net Zero Standard consultation.

Current COSLA Position

Housing to 2040 Strategic Advisory Board (SAB) and Housing SIG

2. A special workshop session of the Housing to 2040 Strategic Advisory Board (SAB) co-chaired by the Housing Minister and Cllr Chalmers, COSLA will have been held on 8 February. The objectives of the session were to share insights on the current context of the housing sector. In addition, develop advice on how to deliver Housing to 2040 in this context, as well as identify areas of focus for the Strategic Advisory Board.
3. In advance of the Housing to 2040 SAB workshop members were asked to provide a 2 page submission in advance of it. As a result, a copy of the COSLA's pre-workshop submission is outlined in Annex 1. This covers the current position of the housing sector, challenges and opportunities.
4. COSLA's Housing Special Interest Group (SIG) also met for the first time in mid-December and was well attended. A number of actions were agreed to further review and consider the recommendations from the Solace Housing Report, as well as gather information on vacant land with the Scottish Govt that could be used for housing. A draft note of the first Housing SIG is shown in Annex 2.

COSLA's Evidence to the Parliament's Local Govt, Housing and Planning Committee.

5. COSLA has been invited by the Scottish Parliament's Local Government, Housing and Planning Committee to provide evidence on the Scottish Government's Housing to 2040 Strategy on 20 February. In advance of the oral evidence session COSLA submitted written evidence that is outlined in Annex 3.
6. The evidence covers the Affordable Housing Supply Programme budgetary cut as well as questions on building homes, placemaking, creating a mix of homes that are accessible, energy efficiency and ensuring that new and existing homes are safe.

EESSH2 Review

7. The Energy Efficiency Standard for Social Housing (EESSH2) that aimed to encourage social landlords to help remove poor energy efficiency as a driver of fuel poverty and contribute to climate change emission reductions is under review by the

Scottish Government. As a result, a consultation on its proposed successor namely the Social Housing Net Zero Standard (SHNZS) was announced in November, 2023 and will close on 8 March, 2023.

What is Changing?

Housing to 2040 Strategic Advisory Board and Housing SIG

8. The Housing to 2040 workshop session on 8 February involved members of the Housing to 2040 Strategic Advisory Board including the Housing Minister and Cllr Chalmers, COSLA as co-chairs. Members will be updated verbally on how the workshop went at the Board meeting.
9. Members should also note that a first meeting of the Strategic Affordable Housing Delivery Board (SAHD) officer group that will report to the Housing to 2040 SAB met on 7 February and a verbal update will also be provided on this at the meeting. The new SAHD officer group's role is to undertake a strategic role of oversight, assurance and escalation for the Affordable Housing Supply Programme (AHSP) within the context of wider housing policy.
10. It is anticipated the next Housing SIG will be held on a date to be confirmed in early March. A draft note of the first Housing SIG is shown in Annex 2 and the next meeting will involve external contributions, as well as input from the Scottish Government on vacant land in local areas that can be potentially used for housing.

COSLA's Evidence to the Parliament's Local Govt, Housing and Planning Committee.

11. Cllr Chalmers, COSLA will provide oral evidence concerning the Housing to 2040 Strategy to the Local Government, Housing and Planning Committee chaired by Arlene Burgess MSP on 20 February. It is anticipated this committee session will focus on the recent cut in the Scottish Government's budget to the Affordable Housing Supply Programme (AHSP), as well as other elements of the Housing to 2040 Strategy.
12. Members are asked to provide their views on the Housing to 2040 Strategy in respect of the AHSP, as well as comment on any other issues raised by the Committee in relation to the Housing to 2040 Strategy.
13. Additionally, the Parliament's Local Government, Housing and Planning Committee are interested to explore the recently laid regulations that make provisions about rent control as a consequence of the expiry of Part 1 of the Cost of Living (Tenant Protection) (Scotland) Act.

Consultation on Social Housing Net Zero Standard (SHNZS)

14. The Scottish Government's current consultation on Social Housing Net Zero Standard (SHNZS)¹ seeks views on its principles and its proposals. The consultation outlines how the proposals would apply to mixed tenure housing, gypsy/traveller sites, as well as the cost and funding associated with the proposals and the timing.

¹ <https://www.gov.scot/publications/consultation-new-social-housing-net-zero-standard-scotland/>

15. The initial views of ALACHO who represent Chief Housing Officers are that the consultation on SHNZS is welcome as the proposals seem more realistic to timeline and the EPC requirement for council and RSL houses. However, it is still unaffordable for social landlords based on a rent based funding model. In addition, other sources of grant based funding need to become available to social landlords to take the pressure away from increasing the rents of tenants to meet the new standard.
16. Members are invited to provide any initial views on the SHNZS consultation from their local authority.

Proposed COSLA Position

17. Feedback from the Board informs COSLA's oral evidence to the Local Govt, Housing and Planning Committee on 20 February and the ongoing discussions with the Housing to 2040 Strategic Advisory Board (SAB).
18. Comments and views on the Scottish Govt's Social Housing Net Zero Standard consultation inform COSLA's response.

Next Steps

19. We will reflect the views from the Board to the Parliament's Local Government, Housing and Planning Committee on 20 February 2024, as well as future meetings of the Housing to 2040 Strategic Advisory Board and to the Scottish Govt's consultation on Social Housing Net Zero Standard.

February 2024

ANNEX 1 – COSLA Submission to the Housing to 2040 Strategic Board Workshop

ASSESSMENT OF THE CURRENT POSITION OF THE HOUSING SECTOR

In Scotland there is a major housing crisis in many parts of the country with housing emergencies declared in three local authorities. Local Government and in particular its largest city councils do not have enough homes available or in the pipeline to meet the needs of Scotland's existing and new populations. This lack of housing represents one of the biggest challenges that Local Govt and its partners face.

Over the course of the last year there has been a record number of homelessness applications in Scotland, reaching around 30,000 that represents a 15% rise. As well as the increasing and very high levels of demand on housing waiting lists within the housing system with around 15,000 people in Temporary Accommodation including 9,500 children.

Housing demand is also increasing as a result of pressures from the humanitarian protection programmes that local authorities participate in. As a result, there has been an increase in the number of Unaccompanied Asylum Seeking Children (UASC) that LAs are required to accommodate, partly due to a streamlined asylum process last year which meant that there was an increase in the number of asylum seekers in Scotland. Also related to this humanitarian work are the housing needs of around 32,975 (January 2024*) displaced people in Scotland fleeing the war in Ukraine through the Homes for Ukraine, Scottish Super Sponsor, Visa and Extension Schemes.

Effective policy interventions are made more difficult because of the lack of coherence between the UK and Scottish Government humanitarian programmes and with approaches to address the unprecedented housing and homelessness challenges that Local Government faces more broadly.

Additionally, the recent significant cut to the Affordable Housing Supply Programme means that the Housing to 2040 target for around 110,000 additional homes by 2032 is very unlikely to be met.

CHALLENGES FACING THE HOUSING SECTOR

A list of current and **ongoing housing challenges** for local authorities and partners is outlined under the following four broad headings:

- **People (local community, asylum seekers and refugees);**
- **Property (housing need, scale of the challenges, link to government housing targets etc);**
- **Regulatory/Statutory challenges; and**
- **Finance (debt, investment levels, etc).**

People

- Record number of people classed as homeless in Scotland
- Lack of housing to support labour mobility, meeting needs of students and others.
- Prioritising housing rights/personal safety of domestic abuse victims

- Managing depopulation in a number of LA areas versus population growth in others
- Streamlined asylum decision making process reducing lengthy backlog, but also increasing housing pressures and not aligning with housing capacity
- Widening of asylum dispersal across all councils
- Ukrainian arrivals to Scotland
- Other refugees arriving through various resettlement routes

Property

- Homelessness crisis in parts of the country with 3 housing emergencies declared in LAs, as well as record numbers of people in temporary accommodation.
- High demand on social rented housing along with shortages and long waiting lists.
- Access to permanent accommodation very limited in certain parts of country.
- Damp and mould issues resulting from property conditions or fuel poverty or both.
- RACC issues for some properties in local authority areas.
- Increasing demand on private rented sector particularly with shrinking sector.
- Housing to 2040 target of 110,00 new homes by 2032 very unlikely to be met.

Regulatory, Statutory and other challenges

- Mandated National Transfer Scheme for UASC, as well as mandatory role for councils in asylum dispersal
- A need for humanitarian programmes to be coherent across Scottish Local Government, Scottish Government and the UK Government.
- Macro economic pressures on the construction of energy efficient affordable housing due to inflationary pressures, supply chain issues and increases in the cost of materials.
- Determination of LAs and RSLs to keep rents low has had an impact on HRA business plans that has meant a lack of resources to build new energy efficient housing to meet AHSP/ESSH2 targets.

Finance

- The Scottish Budget recently cut the Affordable Housing Supply Programme by £196m, around 30%. The impact of this will mean there is a reduction in the number of affordable homes available within local communities, which are intrinsic to addressing homelessness. It will also mean a key target for the Housing to 2040 Strategy in respect of 110,000 homes by 2032 will very unlikely be met.
- Inflationary pressures impacting on all aspects of housing and quality of life issues.
- Higher rents in private rented sector due to lack of availability.
- LA Leaders (and RSLs) commitment to ensure rental increases are kept low over recent years has impacted on housing revenue accounts.
- Rising interest rates causing homeowners to miss mortgage payments that results in some people potentially presenting as homeless.
- Pressure on available housing supply along with a significant cut in the AHSP budget.
- Differential treatment underpinning benchmarking framework for AHSP for LAs - greater costs for LAs to build houses e.g. circa £12K in Highlands and £6K in urban areas.
- Inadequate funding across a number of the humanitarian schemes

OPPORTUNITIES FOR THE HOUSING SECTOR

Build to Rent - The Build to Rent (BTR) sector potentially provides a housing option that could meet the needs and affordability of some households and also offers security of tenure due to the commercial nature of the BTR market. However, the ongoing uncertainty around rent controls in Scotland continues to unnerve investors, who are willing to work within the framework of rent controls but require economic stability and transparency to rebuild their confidence to invest.

Acquisitions - A significantly expanded acquisitions programme is required so that LAs may purchase more properties on the private market to benefit local communities.

Properties in Void - There are around 43,000 homes in Scotland that have been empty for six months or more, of these about 28,000 have been empty for more than 12 months. Some action has been taken in regard to empty homes including the Scottish Empty Homes Partnership and the ability for Councils to increase the tax payable on these properties through the Local Govt Finance (Unoccupied Properties etc) (Scotland) Act 2012, albeit despite the numbers involved and the good will to make the repurposing of empty homes a key component of the solution to the housing crisis, the complexities involved mean this is not a panacea. The vast majority of empty homes are uninhabitable, in locations that would be unsuitable, with owners that cannot be traced or are unwilling to take action to bring them back into use.

Using AHSP Grant for Temporary Accommodation – Consideration of the use of the AHSP grant to fund the development of high quality temporary accommodation in LA areas where there is evidence of high demand and expenditure on temporary accommodation and low turnover of existing social rented housing supply.

Embedding the Vision in Housing to 2040 - The vision in H2040 requires to be embedded across all central government departments to translate into policy and resource allocation, given the wider benefits of the provision of housing.

Provision of Better Quality Homes - The wider benefits to building more and better quality homes is well documented. Better health and an improved quality of life, better educational attainment for young people, significant economic benefits and achieving net zero ambitions are all inextricable linked to housing.

ANNEX 2 – Draft Note of COSLA Housing Special Interest Group (SIG)



Draft Note of COSLA Housing Special Interest Group – 13 December 2023

Present

Cllr Maureen Chalmers (Chairperson)	COSLA
Cllr Kenny Braes	Angus Council
Cllr Ben Parker	Edinburgh Council
Cllr Anne Stirling	Aberdeenshire Council
Cllr Craig Fotheringham	Angus Council
Cllr David Ross	Fife Council
Cllr Kenny Maclean	Glasgow City Council
Cllr Mark Flynn	Dundee City Council
Cllr Gary Robinson	Shetland Islands Council
Cllr Russell Jones	Highland Council
Cllr Stuart Mackenzie	Midlothian Council
Cllr Peter Barrett	Perth and Kinross Council
Cllr Cammy Day	Edinburgh Council
Mike Callaghan	COSLA
Anil Gupta	COSLA
James Fowlie	COSLA
Ed Gordon	COSLA
John Mills	ALACHO
Tony Cain	ALACHO
Pippa Milne	Solace
Catherine Whittaker	Solace
Ailsa Anderson	HOPs

1. Welcome and Introductions

Cllr Chalmers welcomed everyone to the first meeting of the COSLA Housing Special Interest Group (SIG).

Apologies were provided from Cllr Marie McGurk (Renfrewshire Council), John Kerr (ALACHO/West Dunbartonshire Council) and Ishbel Bremner (SLAED/Argyll and Bute Council).

2. Background/Context

• Solace Overview

Pippa Milne, Solace delivered a presentation outlining the findings of the Solace/ALACHO report. The presentation noted:

- The context of greater demand and reduced supply in which Local Government finds itself.
- The increased pressure that the social lets sector is experiencing due to increased demand and greater costs in the private rented sector.
- The challenges faced by local authorities in acquisitioning properties.
- Increased costs in construction as a result of unprecedented inflation and the cost of living crisis.
- The wider strategic context within which housing plays a key role – i.e. education, health, workforce issues, and community infrastructure.
- The rising trend of homelessness, with homeless children increasing by 17% from 2021 to 2022.
- 1800 new properties are required each year across Scotland just to keep up with demand.

The presentation concluded by updating the Group on governance arrangements, noting the establishment of the Strategic Affordable Housing Delivery Board in early 2024.

- **ALACHO's Perspective**

John Mills delivered a presentation from ALACHO focusing on housing and homelessness. The presentation:

- Confronted the question as to what a housing emergency means in-practice?
- Asked the Group what the scale and scope of Scotland's housing and homelessness challenges are.
- Noted a steady increase to local authorities at risk of being unable to deliver statutory duties, with systemic failure now apparent across 14 to 15 councils.
- Outlined a steady increase in homeless presentations, households in temporary accommodation, children in temporary accommodation, and UAOs.
- Updated the Group on the results of the ALACHO RAG survey in November 2023 and presented a number of short-term actions.

In the discussion that followed, members of the Group requested that further work by the SIG should look at the availability and cost of land to local authorities, whether further engagement with large public and private sector landowners could be utilised, and if work setting up a land commission could be explored.

ALACHO confirmed that they have approached the Minister regarding reforms to compulsory sales and purchases, agreeing that the full use of empty stock should be considered regardless of the owner.

It was agreed that analysis of the recommendations in the ALACHO report should be undertaken, noting those areas which are politically unrealistic or could be classified as quick wins.

3. TOR and Membership of the Housing SIG

The Group noted the TOR and Membership and were invited to comment. It was agreed that these could be further developed as the work of the SIG progresses.

4. Future Work Programme of the Housing SIG – Discussion Paper

The Group considered the discussion paper on Future Work.

Members of the Group noted the local variation in housing issues while acknowledging national issues. There was agreement that the work should be divided or 'chunked' into thematic topics or categories to aid structure. Suggestions for work not listed included a focus on transient visitors and student populations, as well as considering how to free up existing housing stock.

On suggested speakers to contribute to the SIG, members recommended inviting speakers from the NHS and tenants groups, as well as practitioners from local authorities.

The Group were advised that planning reforms were still in progress, with the full implications of these changes not yet known in full.

Additionally, it was suggested a future joint meeting be held with the Housing and Planning Ministers.

5. Next Steps

The Group agreed that the following work should take place:

- Analysis of the work produced by Solace and ALACHO and the timeline produced in the paper.
- A response to the provisions of the Housing Bill, which are due to be published in early 2024.
- Dividing the work conducted into general categories and topics.

ANNEX 3 - COSLA Submission to the Scottish Parliament's Local Govt, Housing and Planning Committee



COSLA Submission to the Scottish Parliament's Local Government, Housing and Planning Committee

COSLA welcomes the opportunity to provide written evidence to the Scottish Parliament's Local Government, Housing and Planning Committee on the Housing to 2040 Strategy. As well as oral evidence on 20 February to the Committee.

We have taken the opportunity to provide views on the fairly recent announcement on the Affordable Housing Supply Programme (AHSP) that impacts upon a key headline target of the Housing to 2040 Strategy, as well as briefly responded to the questions posed by the Committee. Our response has also been informed by Local Government professional practitioners from ALACHO and Solace.

Presently, there is a major housing crisis in many parts of Scotland. Local Government and in particular its largest city councils do not have enough homes available or in the pipeline to meet the needs of Scotland's existing and new populations. This lack of housing represents one of the biggest challenges that Local Government and its partners face.

Over the course of the last year there has been a record number of homelessness applications in Scotland. As well as the increasing and very high levels of demand on housing waiting lists within the housing system with around 15,000 people in Temporary Accommodation including 9,500 children.

Housing demand is also increasing as a result of pressures from the humanitarian protection programmes that local authorities participate in. Also related to this humanitarian work are the housing needs of around 32,975 (*January 2024**) displaced people in Scotland fleeing the war in Ukraine through the Homes for Ukraine and Scottish Super Sponsor schemes as well as Visa and Extension Schemes.

Effective policy interventions are made more difficult because of the lack of coherence between the UK and Scottish Government humanitarian programmes and with approaches to address the unprecedented housing and homelessness challenges that Local Government faces more broadly.

COSLA has responded to the housing crisis politically by establishing a Housing Special Interest Group (SIG) chaired by COSLA's Community Wellbeing Spokesperson.

Background

Investment in housing is critical for everyone and supports our ambition for local and national economic growth and the Housing to 2040 Strategy. Housing investment also

needs to be prioritised, given its impact on poverty, communities and the economy, and this is supported by COSLA Leaders.

The recent Scottish Budget cut of the Affordable Housing Supply Programme funding by £196.1m – about 30% was very disappointing. The Programme provides funding for councils and registered social landlords to build or buy houses.

As mentioned councils across Scotland are already experiencing a housing crisis with some local authorities declaring a housing emergency. The impact of the budget cut to the Affordable Housing Supply Programme will mean there is a reduction in the number of affordable homes available within our communities, which are intrinsic to addressing the record level of homelessness across the country.

The housing construction industry is also vital to support our local and national economy, given it supports local jobs and skills. This cut will impact this important sector as well as local council teams, registered social landlords, and will have a negative impact for both local and national construction businesses, with some already going into administration

The cut to the Affordable Housing Supply Programme (AHSP) has been severe and this will cause disruption in the planning and construction of housing over future years due to the inconsistency with the level of funding to meet the Housing to 2040 Strategy. The huge cut in the AHSP will also have an impact on local economies and more importantly homelessness.

Additionally, the budgetary cut could make it difficult for local authorities to deal with other issues such as RACC. As well as put local authorities at potential risk of not being able to meet their statutory duties with respect to homelessness and unsuitable accommodation.

- **Building enough homes or bringing enough homes back into use to meet Scotland's current and future housing needs**

Our view is that not enough homes are being built or being brought back into use to meet Scotland's current and future housing needs, especially in the context of the recent significant cut to the Affordable Housing Supply Programme (AHSP) that will highly likely impact the Housing to 2040 Strategy's key target for the provision of 110,000 new homes by 2032.

Presently, there are around 43,000 homes in Scotland that have been empty for six months or more, of these about 28,000 have been empty for more than 12 months. Some action has been taken in regard to empty homes including the Scottish Empty Homes Partnership and the ability for local authorities to increase the tax payable on these properties through the Local Government Finance (Unoccupied Properties etc) (Scotland) Act 2012. We also welcome the recent changes to be made to LBTT and ADS that will mean local authorities receive tax relief similar to housing associations, when they purchase residential properties for the benefit of increasing housing availability in local communities.

That said, despite the number of empty properties involved and the good will to make the repurposing of empty homes a key component of the solution to the housing crisis,

the complexities involved mean this is not necessarily a panacea. This is because the vast majority of empty homes are uninhabitable, in locations that would be unsuitable, with owners that cannot be traced or are unwilling to take action to bring them back into use.

- **Building homes with a focus on placemaking**

We understand post occupancy surveys in the social housing sector appear to show high levels of satisfaction with new build developments. There is also a great deal of guidance on 20 minute neighbourhoods. These developments are positive, if investment levels are maintained.

Regional variations in the demand for housing are likely to be exacerbated in future years as a result of demographic change and migration. Across the Central Belt of Scotland there is a declining population in a number of local authority areas in the West of Scotland, and population growth in the east of the country.

COSLA and its member councils are seeking to work with the Scottish Govt to ensure that its work on both population distribution and migration reflect the needs and concerns of councils. It is also vital that this work is aligned to the Housing to 2040 Strategy.

- **Creating and sustaining a mix of housing that is financially and physically accessible to all**

Given the projected demography of Scotland's population it will be important in the future there is a greater mix of housing that is financially and physically accessible to all e.g. more homes available to meet the needs of more older people who require accessible housing that has adaptations. As well as housing for the following partnerships, services and groups in our local communities:-

- Health and Social Care Partnerships (HSCPs) and Children's Services (e.g. Kinship carers and Foster carers);
- Veterans who have specific needs requiring a bespoke approach and represent a group with a high priority for housing; and
- Care experienced people in Throughcare and Aftercare.

Additionally, issues such as an emerging demand from those eligible for early release from prison linked to the SHORE Standards and with wider use of Home Detention Curfews (HDCs) will require to be addressed as a means to prevent offenders from reoffending. As well as the shortfall in the supply and quality of accommodation suitable for the Gypsy/Traveller community and an identified group of adults with learning disabilities in hospital long term due to a lack of appropriate local housing and sustainable care and support.

- **Building homes and retrofitting existing homes to provide for affordable warmth and zero emissions**

The Scottish Parliament's Net Zero, Energy and Transport Committee concluded a year ago an inquiry that stated Scotland will not meet targets to be net zero without a more empowered local government sector. Essentially, ensuring that new builds meet stringent environmental standards as well as decarbonising and retrofitting existing housing stock will be key to this however both come with a significant cost.

Last year the Scottish Government announced plans to introduce new minimum environmental design standards for all new build housing to meet a Scottish equivalent to the Passivhaus standard. The cost implications of this are substantial. While it currently costs around £200k to build a new social rented home, this will rise significantly with the new standards. The costs associated with meeting energy efficiency standards for social housing are also significant and we note the Scottish Government's current consultation on the new Social Housing Net Zero Standard.

- **Ensuring that new and existing homes are safe and of a high quality**

We understand issues around internal air quality, dampness and mould can be complicated. That said, we do know that cold damp homes cost lives and cause a lot of ill health. However, there are people in fuel poverty living in cold homes across the country. In addition, there are RACC issues for some properties that require to be addressed.

Undoubtedly, climate change will bring wider challenges in terms of more severe weather events including storms, higher rainfall etc. As a result, flooding including coastal flooding is likely to be much more of an issue in the future. There is also a question of how prepared the country is for those changes e.g. flood defences, deep flow gutters and the capacity of the ground water system.

Additionally, we understand there have been instances of raw sewage being flushed into local rivers in stormy weather due to a lack of monitoring across the country which is a public health hazard for local communities. As well as some flooding incidents caused by reduced maintenance of the drainage system resulting in blockages.

COSLA
February, 2024