

Report of the Strategic Director of Place to the meeting of Regeneration and Environment Scrutiny Committee to be held on the 5th September 2023

Subject:

Empty Homes Update

Summary statement:

This report provides an update on the Council's empty homes programme of work.

EQUALITY & DIVERSITY:

Bringing empty properties back into use has a positive impact on those groups and individuals who suffer multiple disadvantages associated with inadequate supply of housing.

In taking action to bring empty properties back into use the Council is always mindful of its Public Sector Equality Duty (PSED). Before taking any action, formulating or applying policy and exercising discretion the Council will always decide the extent to which the aims of the PSED are relevant and whether people with a protected characteristic may be impacted.

Decisions relating to the use of enforcement action are taken on a case by case basis and relate to a property and the need to bring it back into use.

However, where a specific case involves a person with a recognised shared characteristic, appropriate action will be taken to ensure that the information provided and support given ensures they are not placed at a disadvantage with regard to the process.

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1. SUMMARY

This report provides an update on the Council's empty homes programme of work.

2. BACKGROUND

- 2.1 First and foremost the Local Authority has a statutory responsibility to deal with various matters relating to empty residential dwellings, these include (with examples) the following;
 - The prevention of statutory nuisance from an empty property, such as defects which cause the ingress of dampness to a neighbouring property or the temporary removal of a water supply to an occupied property on a shared supply, usually as a result of the supply being interrupted (turned off) or a defect such as a frozen supply pipe;
 - Securing empty properties against unauthorised entry;
 - Resolving defective drainage, such as defective rainwater goods / gutters resulting in dampness issues;
 - The prevention of damage by pests, such as pigeons nesting in empty properties, infestations of pests and / or vermin (most commonly from overgrown gardens or dilapidated outbuildings).
- 2.2 Furthermore, the provision of quality and affordable housing and communities and neighbourhoods where people want to live is a key strategic priority within both the District Plan and the Council Plan. Tackling empty homes in the district contributes towards the issues of housing supply, housing quality and creating neighbourhoods which are clean and where people feel safe.
- 2.3 As the district has over 226,000 residential properties it is recognised that there are always a number of homes that are empty due to people moving home, ending tenancies, etc. Known as "transactional" empties, these properties are generally empty for less than six months (however due to the current housing market it is not uncommon for properties to remain empty for up to 12 months whilst being sold). These properties do not generally need any intervention from the Housing Service so resources are focussed on properties that have been empty for more than six months (known as long term empties). However, the statutory responsibility relating to empty properties applies irrespective of how long an empty property has been vacant for.
- 2.4 The responsibility and work around empty homes applies to properties of all ownership, both privately owned or social housing, however activity tends to be lesser in social housing as social housing providers generally take more responsibility for their stock and empty properties are usually as a result of a planned programme of lettings or strategic replacement.

The team does not have responsibility for empty commercial properties however will become involved in buildings which have a mixed use, i.e. a flat over a shop. Colleagues in the Environmental Health Service have responsibility for the enforcement around securing empty commercial buildings against unauthorised entry.

- 2.5 The empty homes function forms part of the wider Empty Homes and Loans Team within the Housing Service. For the purposes of this report, the staff dealing with empty homes will be referred to as the Empty Homes Team. The team consists of 3 Environmental Health Officers (2 FTE) and 2 Empty Homes Advisors.
- 2.6 The team has a very close connection with and works very closely with the Council's Revenues and Benefits Service (Council Tax) as this is the main source of statistical information relating to whether the Council 'classes' a property as empty and in which category. The team provides support to the Council Tax team in confirming that a property is empty but not a wider inspection service determining occupancy as this is a Council Tax function.
- 2.7 All local authorities provide a statistical return to central government on an annual basis (in October) of data extracted from the Council Tax database. This includes data on empty properties such as the total number of empty properties and the number of long term empty properties. Long term empty properties, for these purposes, are classed as any property empty for 6 months or more. These figures are published by central government and provide the Council's official position.
- 2.8 At October 2022 there were 3,416 long term empty properties compared with 7,302 long term empty properties in 2009, therefore the current figure shows a reduction of 3,262 long term empty homes since 2009.

3. **REPORT ISSUES**

- 3.1 The scale of the issue with empty homes can be partly represented by the number of them in the district, although the scale of the issues they create and the impact that it has on the neighbourhood, community and residents when a long term empty property is brought back into use is harder to represent and is immeasurable. The following points demonstrate the scale and nature of the empty homes landscape in the district.
- 3.2 Understandably, data and figures fluctuate from month to month, especially those relating to the housing market and empty properties. At July 2023, 3,484 empty properties have been empty for more than six months (long term). For those, the length of time they have been empty for is summarised below (including a comparison with 2020 data):

Length of time empty	Number of properties (2020)	Number of properties (2023)	% of long term empty properties (2023)
6 months – 1 year	1,559	1,157	33.2
1 - 2 years	1,345	1,160	33.3 (increase)
2 - 3 years	444	416	11.9 (increase)
3 - 5 years	467	378	10.9
5 - 10 years	264	242	6.9
Over 10 years	189	131	3.8
Total	4,268	3,484	

- 3.3 Of the 3,484 long term empty properties in July 2023, 2,481 properties were owned by individual owners, i.e. owners that only own one property. A further 137 owners only own two properties, 35 owners own three properties and 11 owners own 4 each (and so on). What this demonstrates is that, overwhelmingly, empty properties in the Bradford district are owned by people who are not large portfolio holders or landlords operating multiple properties, they are individuals who own single properties, most commonly as a result of inheritance, a family or relationship breakdown, older people going into care, financial difficulties, etc. There are some larger 'portfolio' holders that own 10 or more properties however these are very small in number (14).
- 3.4 The most significant portfolio owner in the district is Incommunities Housing Group, being the largest stock owning housing association in Bradford. Some of Incommunities strategic long term investment / regeneration plans currently contribute to the number of empty homes in Bradford. At July 2023, Incommunities owned 201 empty properties in the district, 147 of which are long term empty properties (empty for longer than six months). 79 of these units are flats contained within a development which is earmarked for demolition in 2024 and there are a smaller number located in other buildings where feasibility assessments are being carried out for either renovation or demolition. Incommunities have initiated a programme of review for all of their longer term empty

properties with a view to categorising them for action in the future, this being either demolition, renovation, reconfiguring with adjoining properties, and so on.

3.5 The Council maintains close contact with Incommunities regarding their empty properties, their long term strategy and opportunities to work in partnership on either their own empty properties or privately owned properties.

In particular, the Council initially offers any property acquired through either compulsory purchase or voluntary acquisition that is located on the ex-local authority housing 'estates' to Incommunities for purchase so that they can increase their stock and manage them amongst their existing properties.

3.6 Prior to 2015 the only indicator relating to empty homes reported on the <u>net</u> number of long term empty homes in the district. This figure represented the number of long term empties as a net figure resulting from properties becoming empty and all those no longer being empty. This indicator did not easily illustrate how many empty properties were no longer empty in the district or allow us to appreciate the scale of the 'churn' of empty properties and the impact this would have on communities. Consequently, in 2015, the Council introduced an additional performance indicator relating to empty homes.

The additional indicator reports on the total number of long term empty properties that have ceased to be empty. This is reported on a monthly basis as a rolling 12 month figure. The July 2023 outturn for this indicator is 2,128, meaning that in the year July 2022 to July 2023, 2,128 long term empty properties ceased to be empty.

3.7 Demand for the investigations and action by the Empty Homes Team continues to be high with 311 service requests being responded to in the year 2022/23 and 95 so far (July) in the current year 2023/24.

- 3.8 The work of the team is a mixture of this reactive work as well as proactive work generated from the Councils' own data, intelligence and surveys of the district. The team are dealing with around 1,000 live cases of empty properties at any one time.
- 3.9 At the end of July 2023, the breakdown of the type of request for service or investigation relating to these live cases is given below:

Nature of Request / Intervention	No.
Long Term Empty Property – General Issues / Concerns	352
Request for Empty Property Advice	210
Proactive Empty Property Investigation	339
Defective Gutters at an Empty Property	11
Damp causing a nuisance from an Empty Property	25
Complaint of Pests from an Empty Property	20
Filthy & Verminous Empty Property	2
Request from Council Tax	9
Empty Property Referred from WY Police	7
Insecure Empty Property	1
Empty Property Loan Enquiry	13
Empty Property Loan or Assistance Case	2
Total	991

- 3.10 The activity of the team and the wards in which the team are most active mirror generally the wards which contain the higher number of long term empty properties, these being highlighted in Appendix 1. This table shows the number of long term empty properties at July 2023 by ward, compared with the figures in February 2020 (the last report presented to Committee). Positively, the number of long term empties has reduced considerably and this is spread across nearly all wards with the exception of 7 wards where there has been a small increase in each. The exception there is the 8th ward, Eccleshill, where there has been a significant increase of more than double. However, this increase is predominantly as a result of an Incommunities property which is discussed in item 3.4 above. Removing this figure of 79 flats results in a small increase of 5 from 2020.
- 3.11 The team's focus is on the most problematic long term empty properties and those considered to be of a higher risk (following a risk assessment by officers) are targeted more intensely by officers for action. Of the live cases being dealt with by the team there are currently 92 high risk long term empty properties. Every one of these properties is being dealt with according to the circumstances and the willingness/activity of the owner/s.
- 3.12 Again, the higher risk properties that the team are dealing with also tend to mirror the wards which contain the higher proportion of long term empty properties.
- 3.13 The team works with owners to explore the full range of options available to them to bring properties back into use. A proportion of the work and response provided by the team relates to resolving issues through formal enforcement powers such as nuisance from empty properties (i.e. dampness) and securing empty properties against unauthorised access.

- 3.14 Empty Homes Advisors work both reactively and proactively to investigate the circumstances surrounding empty properties and provide advice to owners on their options, including products available and organisations that may be able to help. They also provide investigative work which supports enforcement action carried out by Environmental Health Officers in the team.
- 3.15 The team has built up many years of experience in carrying out investigations into the ownership of empty properties, which can be complex. Owners are traced in a number and combination of ways involving access to and cross checking of systems such as Council Tax, Land Registry, Probate Registers, Companies House, the use of search agents, knowledge of the district and ownership and investigation skills using local intelligence. Where the team is permitted to, information is shared other enforcement agencies and internal Departments to help them resolve issues they are facing.
- 3.16 Such organisations and teams include WY Police, Adult Services, Environmental Health, Highways, Council Tax, DWP, Council Wardens and Yorkshire Water. The team attends ward partnership meetings to share intelligence about empties and pick up any issues that are being reported to other agencies and agree a joined up approach. The team also receives referrals from WY Police relating to empty properties that have been used as cannabis farms and shares intelligence relating to ownership. It also allows the team to follow up future use of the property with the owner, who is often unaware of the illegal activity.
- 3.17 The team is often the only Service or body that has the power to gain entry to abandoned empty properties that are causing severe issues that may be causing multiple problems for neighbourhoods and multiple organisations. This often involves obtaining warrants for entry.
- 3.18 The team is proud to be nationally recognised and have a strong presence and expertise in the field of long term empty properties and be a source of advice and guidance for other authorities. The team has been recognised nationally by the Empty Homes Network, being a standout winner of an award for 'Meeting the Challenge' because of the individual approach it takes to all empty homes cases and the variety of options available to empty homes owners within our area in addition to an Innovation Award for offering Sharia approved equity loans for the owners of empty properties. An individual member of the team has also been awarded 'Empty Property Practitioner of the Year' for their dedication and work in bringing empty properties back into use.
- 3.19 In some cases, normally those considered to be high priority, officers have to use the ultimate sanction against uncooperative owners which is compulsory purchase. Since 2010, the service has voluntarily acquired 53 properties and compulsorily purchased 47 properties. There are a further 26 cases currently ongoing where the Council is attempting to acquire properties, 18 of which are through compulsory purchase and 8 are through voluntary acquisition.
- 3.20 Should the compulsory purchase of an empty property be objected to by an interested party the case is subject to a Public Inquiry where the Council is required to make its case to the National Planning Inspectorate in pursuing the order, as is the owner for retaining ownership. There is one such case at this stage (July 2023) and the Council

is awaiting notification of a date for the public inquiry.

- 3.21 The team developed two financial products that can provide essential funding to an empty property owner to help bring their properties back into use. The Empty Property Loan (EPL) is an equity share loan which is repayable after a five year period and relies on their being spare equity in a property for the owner to borrow against. This acknowledges the lack of disposal income that many empty property owners have available to renovate their property. For the period of the loan the Council registers a charge against the property. In order to repay the loan, which has to be a serious consideration for the owner, they may consider using net income accumulated from renting the property, remortgaging the property, selling the property and so on. To date, just under 600 enquiries have been received and 36 loans have been completed.
- 3.22 Empty Property Assistance (EPA) is a small grant of up to £5,000 which owners can only access where they have been unable to access the Empty Property Loan due to a lack of equity. This is a none repayable grant and a last resort, providing help to empty property owners who have no other means of funding and who have exhausted all other ways to raise finance. It will only suit circumstances where works costing up to £5,000 will bring the property back into use. Since it was introduced in late 2014, 20 of these have been completed.
- 3.23 It is acknowledged that the take up of financial assistance products from the Council is disappointing and this is reflective of a number of factors, such as:
 - There is often very little equity available in the empty property which affects the ability for the owner to take up a loan. Many owners are in fact in 'negative equity';
 - The work required to bring the property back into use often exceeds the loan or grant that can be offered;
 - Owners have a preference not to take out a loan against a property as they see this as lessening their asset;
 - Empty property owners are frequently indecisive about their long term objective for the property.
- 3.24 Overwhelmingly, empty property owners are notoriously very difficult to engage with. Officers have an accumulated wealth of experience in trying to engage with owners who have an asset but are commonly not in a position to or prepared to deal with that asset due to any one of a number or combination of barriers. As mentioned earlier in the report, owners suffer from inheritance anxiety, family or relationship breakdowns, older owners have gone into care, they have financial difficulties or mental health issues and many properties are linked with criminal activity. Owners who may appear to be responsible, professional and capable individuals often leave properties empty for sustained periods of time and many distant owners often fall into the 'out of sight, out of mind' category.

4. FINANCIAL & RESOURCE APPRAISAL

4.1 The service continues to recycle the capital funding for the empty homes programme through repaid Empty Property Loans and the sale of properties acquired through CPO and agreement. Properties that have been acquired are marketed and sold with

a condition of the sale being that the property must be renovated within 12 months. The funding supports the team going forward and bringing homes back into use.

- 4.2 The team contributes significantly to the reduction of debt to the Council through its activity.
 - The team works closely with colleagues in Council Tax to identify debt, either Council Tax or other previous enforcement action where debt has been accrued and this provides cases for Enforced Sale where the sale of the property is forced through a legal process (by Council Tax and Legal Services) and the debt to the Council is recovered through the sale amount.
 - Access to the financial assistance that the team offers through the Empty Property Loan and Empty Property Assistance is only allowed if the owner has cleared any outstanding debt to the Council first.
 - In cases where the team acquires properties, either through CPO or voluntary acquisition, any debt associated with the property, whether this be care home fees (through a charge on a property), Environmental Enforcement default work, Housing default work, Council Tax, etc is recovered and brought back into the Council in that this debt is paid to the relevant department first before the owner or estate receives the remaining sale amount.
- 4.3 The financial benefit to the Council of bringing empty homes back into use can be measured in a number of ways with one of the most significant being its contribution to the New Homes Bonus (NHB) awarded by Government. The NHB Scheme, which started in 2011, provides funding, based on an amount per property, for areas that allow new homes to be built and the number of empty homes brought back into use contributes to this. Government funding is set aside for local Councils that welcome new housing development and bring empty homes back into use. This funding does not come directly into the Housing Service or Empty Homes Team, it is received corporately and can be spent to benefit the local community.

Unfortunately the government has not confirmed whether there will be a further round of NHB payments in 2023/24 however civil servants have indicated to some sector representatives that payments are likely to continue.

- 4.4 Since April 2013 the Council has been charging a Council Tax premium on empty homes which have been vacant for more than two years.
- 4.5 At the Council's meeting of the Executive Committee on the 4th December 2018, and in accordance with The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 it was agreed that the Council would further increase Council Tax premiums on empty properties with this increase being phased in over three years. The purpose of the change was to incentivise owners to bring their property back into use.

The impact of these further premiums was:

- From 1st April 2019 properties empty for at least 2 years were charged 200% Council Tax.
- From 1st April 2021:
 - properties empty for between 2 and 5 years are charged 200% Council Tax.
 - properties empty for between 5 and 10 years are charged 300% Council Tax.

- properties empty for 10 years or more are charged 400% Council Tax.
- 4.6 At any one time there are between 1,000 and 1,300 properties that have been empty for more two years. Using Council Tax data, the number of empty homes vacant for more than two years in 2013 was 1,756 and in July 2023 it was 1,167. This represents a drop of over 33% in the number of properties empty for over two years.
- 4.7 The government is taking steps to strengthen the existing long term empty homes premium and introducing a new second homes premium through the Levelling Up and Regeneration Bill. Consultation, which ends on the 31st August 2023, seeks views on a range of circumstances where it may not be appropriate for a council tax premium to apply (exemptions/exceptions). The main changes in the Bill for which this is relevant are:
 - The Bill proposes to amend the definition of 'long term empty homes <u>for Council</u> <u>Tax purposes</u>' so that, for financial years from 2024/25 onwards, dwellings unoccupied and substantially unfurnished for a continuous period of at least one year are liable to the council tax premium (this currently starts at 2 years and the change would result in, using July 2023 figures, an additional 1,160 owners paying 200% Council Tax;
 - The Bill proposes powers for Local Authorities to charge a discretionary council tax premium of up to 100% for second homes.
 - The consultation asks Local Authorities for their views on the following as potential exemptions from the above premiums;
 - Following Class F exemption (awaiting probate after death of owner) the period before a premium would be charged after probate is obtained, for either an empty property or second home, is 12 months rather than the existing 6 months,
 - Where a property is empty for 12 months, or a second home, an exemption of 6 months from the premium where the property is being actively marketed for sale or to let,
 - Empty properties undergoing major repair works or structural alterations should be an exception to the premium for up to 6 months,
 - Owners may also combine the above exemptions to give longer periods of time without being charged the premium if relevant.
- 4.8 Colleagues in Revenues and Benefits are leading on the response to the consultation and at the time of writing this report a consultation response has not been finalised.

5. RISK MANAGEMENT AND GOVERNANCE ISSUES

No significant risks have been identified.

6. LEGAL APPRAISAL

6.1 The team takes enforcement action under a number of pieces of legislation, the most commonly used are;

- The Local Government (Miscellaneous Provisions) Act 1982 securing empty properties against unauthorised entry;
- The Prevention of Damage by Pests Act 1949 dealing with accumulations that can attract and harbour pests/vermin and infestations;
- The Public Health Act 1936 dealing with empty properties that may be filthy and/or verminous;
- The Environmental Protection Act 1990 dealing with statutory nuisance from an empty property;
- The Building Act 1984 dealing with defective drainage at an empty property;
- The Housing Act 1985 carrying out the compulsory purchase of empty properties.
- 6.2 The Housing Service provides funding for a Legal Officer to deal with all legal matters relating to empty homes activity. This work utilises 100% of the officers time and relates predominantly to the legal process and conveyancing around compulsory purchase and purchasing properties through voluntary acquisition.
- 6.3 The officer also advises on other property related matters and assists the service when empty property owners take up the legal assistance scheme.
- 6.4 When necessary, Legal Services also provide advice on the format of legal documents and procedures required to implement statutory responsibilities.

7. OTHER IMPLICATIONS

7.1 SUSTAINABILITY IMPLICATIONS

The Councils work on bringing empty homes back into use supports the objective of making use of existing resources to provide housing wherever possible rather than using new materials to construct new housing. Significant CO_2 emissions occur through construction which may be avoided by maximising the existing housing stock. Greenfield sites in particular comprise a valuable resource for biodiversity, recreation and resilience to climate change which further strengthens the case for consolidating existing housing stock and previously developed land.

7.2 TACKLING THE CLIMATE EMERGENCY IMPLICATIONS

Inevitably, occupied homes will contribute additional emissions of around 6 tonnes of CO2 annually, thereby increasing overall emissions for the district. The objective therefore will be to influence energy efficiency refurbishments including internal wall insulation, under floor insulation and an efficient new heating system.

7.3 COMMUNITY SAFETY IMPLICATIONS

7.3.1 The presence of empty homes within communities impacts significantly on community safety, the fear of crime and the feelings that residents have towards their neighbourhood. As a result, the success of the team, and returning a property into occupation, impacts significantly on whole streets and neighbourhoods.

- 7.3.2 Empty homes often attract antisocial behaviour, accumulations of refuse and also criminal activity, i.e. cannabis farms, squatting, drug related activity and fraud. The team often work with neighbourhood wardens, Neighbourhood Services and the police to highlight and tackle problematic properties, ensuring that action can be taken where possible.
- 7.3.3 The team attends Ward Partnership meetings, providing and gathering information about problematic properties and the service attends the Serious Organised Crime operational meetings and strategy meetings in order to share intelligence and strategies.

7.4 HUMAN RIGHTS ACT

- 7.4.1 A key element of the teams' work in the enforcement of legislation, and in particular in the compulsory purchase of properties is the consideration of individuals' human rights, both those of the property owner/s and the residents in the neighbouring properties or community.
- 7.4.2 All actions taken by the team are in line with the Private Sector Housing Enforcement Policy (reviewed and agreed by the Council's Executive Committee on the 8th March 2022).

7.5 TRADE UNION

No Trade Union implications have been identified.

7.6 WARD IMPLICATIONS

- 7.6.1 The team responds to all service requests across the district and works proactively to target the most problematic empties on a risk assessed basis regardless of location.
- 7.6.2 The team also attend Ward Partnership meetings, providing and gathering intelligence about problematic properties.

7.7 IMPLICATIONS FOR CHILDREN AND YOUNG PEOPLE

- 7.7.1 Tackling empty homes can have a significant impact on young people in the district by removing properties that impact adversely on the feeling of safety in a community and reducing the fear of crime. The anti-social behaviour often associated with empty properties can provide a source of anxiety for young people but also provide a temptation for young people to be drawn into this activity and even worse crime, ultimately risking their own safety and future potential.
- 7.7.2 In the longer term, bringing more properties back into use in the district and increasing housing supply provides more opportunities for young people to find

housing and remain in the communities in which they feel a belonging and a comfort.

7.7.3 The team works closely with a number of charities and has partnership agreements in place with them which enables, where appropriate, the disposal of properties acquired to them. In particular, one such charity is Bradford Youthbuild who take properties into a portfolio and renovate them for future affordable rental use, with the use of a partnering contractor who employs and trains young people, often from chaotic backgrounds, in building and technical trades. Trainees themselves have been offered housing in the resulting accommodation and the owner of the contracting company himself was an original Youthbuild trainee.

7.8 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT

The Housing service routinely completes Privacy Impact Assessments in line with legislation where there is a change in policy and/or practice. Any issues identified through those assessments are then addressed.

8. NOT FOR PUBLICATION DOCUMENTS

None.

9. OPTIONS

None

10. RECOMMENDATIONS

That the Committee notes the report and requests a further update on the work of the Empty Homes Team in 2 years.

11. APPENDICES

Appendix 1 – Breakdown of <u>long term</u> empty properties at July 2023 and comparison with February 2020, by Ward

12. BACKGROUND DOCUMENTS

None

Appendix 1 – Breakdown of <u>long term</u> empty properties at July 2023 and comparison with February 2020, by Ward

Ward	No. Long Term Empty Properties Feb 2020	No. Long Term Empty Properties July 2023	Change Since 2020 (Increase / Decrease)
Baildon	48	63	1
Bingley	86	102	^
Bingley Rural	109	94	◆
Bolton And Undercliffe	118	107	◆
Bowling And Barkerend	213	159	◆
Bradford Moor	168	125	◆
City	680	355	↓
Clayton And Fairweather Green	85	94	1
Craven	109	78	◆
Eccleshill	82	166	^ *
Great Horton	216	167	V
Heaton	147	150	1
Idle And Thackley	88	68	◆
llkley	106	98	◆
Keighley Central	211	182	↓
Keighley East	164	98	◆
Keighley West	189	101	◆
Little Horton	152	119	↓
Manningham	202	156	◆
Queensbury	86	77	•
Royds	115	86	↓
Shipley	98	107	1
Thornton And Allerton	109	105	◆
Toller	146	130	◆
Tong	116	110	↓
Wharfedale	44	31	◆
Wibsey	110	92	↓
Windhill And Wrose	79	60	◆
Worth Valley	114	116	1
Wyke	78	88	1
Total	4,268	3,484	Voverall 🗸

* See Report items 3.4 and 3.10