

Summary of Empty Homes consultation and Audit Commission comments to draft Empty Homes strategy

Part A below is a summary of the Parish Council response with initial Head of Service comments to the responses.

Part B is a copy of a more detailed response from Aspley Guise Parish Council, who are generally more critical of the draft strategy.

Part C is a summary of the Audit Commission comments on the draft strategy made during the recent Strategic Housing Services advice and assistance inspection.

Part A - summary of the Parish Council responses

1. The draft strategy proposes a focus on longer term empty homes. Do you agree with this?

Your view or response?

Yes (Dunton Parish Council)

Yes (Ampthill Town Council)

Yes – over 1 year (B Smith)

Yes (Chalton Parish Council)

Yes (Brogborough Parish Council)

Should focus on those properties having greatest community impact, regardless of time considerations (Pulloxhill Parish Council)

Yes (Husborne Crawley Parish Council)

Members support this proposal (Sandy Town Council)

Yes (Flitton and Greenfield Parish Council)

Yes (Shefford Town Council)

Yes (Clophill Parish Council)

If by longer you mean 1 year, YES (Streatley parish Council)

Yes (Toddington Parish Council)

Yes (Sundon Parish Council)

Yes (Shefford Cllr Fisher)

Yes (Millbrook Parish Council)

As there are only 158 homes empty for more than 5years, we feel that a lot of time, resources and money is being spent that could be used more beneficially elsewhere (Chalgrave Parish Council)

Yes (P Meadows)

No (Aspley Guise Parish Council) – see detail below

Head of Service comments

Of the 19 responses, 16 agreed with the proposal to focus on the longest term empty homes. The comment made by Pulloxhill is valid and also proposed within the strategy

(tackling all empty homes having an impact on the local community). Chalgrave PC assumed that “long term” meant over 5 years, whereas the strategy proposes a focus on those empty for more than 6 months, with a priority focus on those empty for more than 5 years. Only Aspley Guise strongly disagreed – see Part B below.

2. The strategy proposes five key delivery actions to help achieve the overall aim to bring long term empty homes into use. Are these actions the right approach?

Your view or response?

Yes (Dunton Parish Council)

Yes (Amphill Town Council)

Mainly Yes (B Smith)

Yes (Chalton Parish Council)

Yes (Brogborough Parish Council)

Yes (Pulloxhill Parish Council)

Yes (Husborne Crawley Parish Council)

Members support this proposal (Sandy Town Council)

Yes (Flitton and Greenfield Parish Council)

Yes (Shefford Town Council)

Yes (Clophill Parish Council)

Yes. But item 4 should be the 2nd priority (Streatley Parish Council)

Yes (Toddington Parish Council)

Yes (Sundon Parish Council)

Yes (Shefford Cllr)

Yes (Millbrook Parish Council)

Yes (P Meadows)

No (Aspley Guise Parish Council) – see detail below but essentially require greater involvement and resource to tackle all empty homes

Head of Service comments

Of the 18 responses, 17 agreed with the proposed 5 key delivery actions. Aspley Guise strongly disagreed – see Part B below.

3. The draft strategy suggests that the Council needs to better understand why so many homes are left empty for long periods, do you agree with the need to research this?

Your view or response?

Yes (Dunton Parish Council)

Yes (Amphill Town Council)

Not necessarily (B Smith)

Yes (Chalton Parish Council)

No (Brogborough Parish Council)

If it is done quickly and cheaply and effectively there is a lot of data on this already available and Central Beds is unlikely to be unusual (Pulloxhill Parish Council)
 Very much so (Husborne Crawley Parish Council)
 Members support this proposal (Sandy Town Council)
 Yes (Flitton and Greenfield Parish Council)
 Yes (Shefford Town Council)
 Yes, but concerned to keep costs of research to a minimum (Clophill Parish Council)
 Yes, but this problem has not suddenly arisen (Streatley Parish Council)
 Yes (Toddington Parish Council)
 Yes. Incentives should be made by the Council to encourage owners to let to reduce housing lets (Sundon Parish Council)
 Yes (Shefford Cllr)
 No, what people do with their own property is a matter for them (Millbrook Parish Council)
 Yes (P Meadows)
No (Aspley Guise Parish Council) – see detail below but essentially Aspley Guise feel that there is enough known about the reason why homes are empty.

Head of Service comments

Of the 18 responses, 13 agreed with the proposals to undertake research into why longer term homes remain empty and 1 only if the research was “cheap and effective”. 4 did not agree with the proposal, although Aspley Guise felt that this was because there was already sufficient information known locally, which does not appear to be the case.

4. The draft strategy suggests that a simple “scoring” of empty homes is used to prioritise action; do you agree with this approach?

Your view or response?

Yes (Dunton Parish Council)
 Yes (Ampthill Town Council)
 Need if awareness of the criteria required (B Smith)
 Yes (Chalton Parish Council)
 Yes (Brogborough Parish Council)
 Simpler the better (Pulloxhill Parish Council)
 Need to understand better to comment (Husborne Crawley Parish Council)
 Members support this proposal (Sandy Town Council)
 Yes (Flitton and Greenfield Parish Council)
 Yes (Shefford Town Council)
 Yes (Clophill Parish Council)
 Yes (Streatley Parish Council)
 Yes (Toddington Parish Council)
 Yes (Sundon Parish Council)
 It might work (Shefford Cllr Fisher)
 No (Millbrook Parish Council)
 Yes (P Meadows) but with flexibility

No (Aspley Guise Parish Council) – see detail below. Aspley Guise feel that a simple scoring of empty homes is the right approach but not as suggested.

Head of Service comments

Of the 18 responses, 14 agreed with the proposals to “score” priority empty homes and 1 said that it might work. 1 was unsure. 2 did not agree with the proposal, although Aspley Guise felt that a different type of scoring criteria should apply, so agreed with the principle.

5. The draft strategy suggests that the Council needs to harmonise the Council Tax discount rate for empty homes. What do you feel is the right level of discount?

Your view or response?

Not sure / no comment (Dunton Parish Council)

Yes (Amphill Town Council)

75% (B Smith)

50% for 12 months only (Chalton Parish Council)

50% first 6 months, then full Council Tax amount (Brogborough Parish Council)

None, unless development or improvement work is ongoing within an agreed timescale (Pulloxhill Parish Council)

If they are empty for a good reason, No charge should be made, otherwise no discount (Husborne Crawley Parish Council)

Town Council suggests that the scoring system suggested in the question above should be used to decide the level of discount (Sandy Town Council)

50% (Flitton and Greenfield Parish Council)

75% of full tax (Shefford Town Council)

We believe that the level should be ‘high’ to discourage lengthy periods of emptiness (Clophill Parish Council)

25% - 50% (Streatley Parish Council)

Not known (Toddingon Parish Council)

Exactly (Sundon Parish Council)

20-25% (Shefford Cllr)

50% (P Meadows)

Discount should depend on the reason the property is empty (Millbrook Parish Council)

Aspley Guise Parish Council – suggest 50% discount with conditions

Head of Service comments

Of the 17 responses, there were a wide range of views;

1 suggested 75% discount

3 suggested a straight 50% discount

2 suggested a 50% discount for a limited time

1 suggested a 25% to 50% discount

1 suggested a 20% to 25% discount

1 suggested a straight 25% discount
2 suggested no discount (unless good reasons why empty, e.g. renovation)
2 suggested that discount should depend on why homes were empty, (scoring system suggested)
1 suggested a “low” discount to encourage re-occupation
4 responses did not give indication/view

6. At a time when resources are under pressure, should the Council provide some level of resource towards tackling the highest priority empty homes?

Your view or response?

Yes (Dunton Parish Council)
Yes (Amphill Town Council)
Only when absolutely necessary finance is required (B Smith)
Only very limited resources (Chalton Parish Council)
Yes (Brogborough Parish Council)
Yes. It is cost effective if homes are brought back into occupation (Pulloxhill Parish Council)
Yes (Husborne Crawley Parish Council)
Members support this proposal (Sandy Town Council)
No – very low priority (Flitton and Greenfield Parish Council)
No (Shefford Town Council)
Yes, at low cost and combined with Council Tax charging (see answer to number 5).
(Clophill Parish Council)
Yes (Streatley Parish Council)
Yes (Toddington Parish Council)
Yes. We need affordable homes (Sundon Parish Council)
Yes (Shefford Cllr)
No (Millbrook Parish Council)
Yes (P Meadows) tackling empty homes should be a high priority for the Council
Yes (Aspley Guise) but resources should be for all empty homes

Head of Service comments

Of the 18 responses, 13 supported the view that Central Bedfordshire Council should provide some level of resource, and a further 2 suggested only where necessary or limited resource only. 3 suggested that the Council should not resource empty homes work.

Please provide any further comments here.

Presumably need to identify owners and their reasons for property being unoccupied (B Smith)
This will be useless unless prompt and effective action is taken against empty home owners (Pulloxhill Parish Council)

I am interested in this issue but have been very busy, Happy to talk... (Husborne Crawley Parish Council)

Members thought it would be helpful if CBC provided a breakdown of the successful methods of achieving re-occupancy and the proportion of empty homes owned by Housing Associations and CBC (Sandy Town Council)

All actions should be at the cost of the property owner (Shefford Town Council)

This policy could mitigate (offset) the new housing requirement and should be a major policy requirement (Streatley Parish Council)

This is an area with high demand for property and as such there are few empty properties (Toddington Parish Council)

Some empty homes need a lot doing to them. Help to bring them up to scratch may help (Shefford Cllr)

Surprised at the number of empty homes (P Meadows)

Head of Service comments

The comments above cover a range of issues. The comments from Sandy are interesting and will try to be incorporated into monitoring of empty homes following implementation.

Aspley Guise Parish Council

Key question	Your view or response?
1. The draft strategy proposes a focus on longer term empty homes. Do you agree with this?	<p>No – we consider that this skews the whole document, towards dealing expensively with long term problem properties, rather than a strategy that</p> <ul style="list-style-type: none">a) puts forward robust partnership processes to identify empty properties and the reasons for non use at an early stageb) puts forward robust partnership process to identify reasons for existing empty propertiesc) puts forward cost effective processes for monitoring and appropriate financial and non financial interventions/incentives targeted at the particularity that could be considered to bring the property back to use andd) selectively addresses robustly long term empty properties both to deal with blighted neighbourhoods but also to give a message to owners and landlords that enforcement action will be taken. <p>We would further add that the strategy should not just focus on private sector empty homes but include public sector empty homes (council and housing association) and non residential buildings.</p>
	<p>Head of Service comments Re a), tackling empty homes <u>early</u> would include</p>

	<p>those that may be empty for only a short time for understandable reasons (between rents, for sale, job related). These are not normally the homes that blight neighbourhoods, and the Council does not have the resources to put towards homes that may be empty for only a short time</p> <p>Re b), the strategy does suggest a partnership approach. The partners mentioned in the strategy are not exhaustive and we envisage developing new, robust partnerships as the strategy and service develops. We are at a starting point and recognise that robust partnerships have not developed yet.</p> <p>Re c), the issue on cost effectiveness of approach was also mentioned by the Audit Commission. This will have to be examined in more depth as part of the overall examination of services in the context of cost cuts during 2011/12 and beyond. If long term homes are brought back into use through the strategy implementation, the costs per property can be examined and compared to new build. The strategy does suggest a number of incentives/interventions as policy tools, although recognises that they will be subject to resources.</p> <p>Re d), the strategy does suggest a more robust approach on those homes empty for 5 years or more and those blighting neighbourhoods</p> <p>The strategy intentionally focuses on empty private sector homes as there are more robust targets, monitoring processes and financial incentives to return social housing (CBC and RSL's) back into occupation as soon as possible. CBC has given particular focus to minimise void times over the last 3 months. It is accepted that empty commercial properties can blight neighbourhoods but policy tools included in the strategy are not relevant or available to tackle commercial properties. This is a housing related strategy.</p>
<p>2. The strategy proposes five key delivery actions to help achieve the overall aim to bring long term empty homes into use. Are these actions the right approach?</p>	<p>No – The five key priority actions should be much more robust and focused.</p> <ol style="list-style-type: none"> 1. To communicate the importance of the empty homes and properties issue in Central Bedfordshire.

	<ol style="list-style-type: none"> 2. To identify through internal and external partners all empty properties and the reasons why properties are empty. 3. Set up monitoring and review processes for each property identified. 4. Take appropriate actions to return empty properties back into use 5. Monitor and review the effectiveness of those actions
	<p>Head of Service comments</p> <p>Re 1, as part of raising awareness, we will aim to communicate the importance of empty homes in Central Bedfordshire.</p> <p>Re 2, see comment above, we do not intend to identify empty homes that have been empty for less than 6 months. We do intend to identify long term empty homes through partnerships and this will be an intended outcome from delivery action No 3 in the strategy.</p> <p>Re 3, there will be a monitoring and review process for the highest priority empty homes but there is not the resource to undertake this for all empty homes.</p> <p>Re 4, and 5, as in strategy</p>
<p>3. The draft strategy suggests that the Council needs to better understand why so many homes are left empty for long periods, do you agree with the need to research this?</p>	<p>It is not cost effective to spend time researching when a lot is already known, and when by early identification of the reasons and monitoring and review this information will be readily available to reflect changing trends – so that interventions can be targeted.</p>
	<p>Head of Service comments</p> <p>Some information is known locally but not much. The Audit Commission recommend that we undertake local research to better inform the strategy.</p>
<p>4. The draft strategy suggests that a simple “scoring” of empty homes is used to prioritise action; do you agree with this approach?</p>	<p>We would agree with a scoring criterion in respect of prioritising formal enforcement action, although not supportive of the criteria as set out. We would not be supportive of this criteria being used before the council identifies the reason for the property being empty, uses informal non-enforcement</p>

	<p>interventions and incentives and monitoring and review of empty properties. The strategy text appears to state that the council will do nothing until a property is empty for 5 years and that we consider is unacceptable.</p>
	<p>Head of Service comments</p> <p>The strategy does not intend to state that the Council will do nothing until a property has been empty for 5 years or more. No other responder has formed that view. The proposal is to focus main efforts on those homes that have been a problem to communities AND those empty for 5 years or longer (even if they have not been the subject of complaint from communities). There will be monitoring of, and lesser focus on homes empty for 6 months or longer but the Council does not realistically have the resources to closely monitor and robustly, regularly progress action in respect of over 1,100 empty properties.</p> <p>The comments about the scoring criteria will be taken on board when these are more fully developed by the Team Manager leading on empty homes.</p>
<p>4. The draft strategy suggests that the Council needs to harmonise the Council Tax discount rate for empty homes. What do you feel is the right level of discount?</p>	<p>We consider that Council Tax and Business Rate is a very useful tool both in incentivising landlords/owners to identify empty properties and the reasons why they are empty, and the use of time limits as an encouragement to bring them back into use or sell.</p> <p>We have also considered the exemptions – and where in local control these should be revisited – with more time limits applied and where not within local control, consideration of making a neighbourhood charge against a property in specific cases, e.g. repossession, where the mortgage lender is awaiting improved housing prices to realise their assets.</p> <p>If the council does not consider using Council Tax and Business Rate as an effective tool, then harmonisation discounts should be the 50% discount. A 10% discount provides little incentive for</p>

	landlords or owners to identify and provide reasons for an empty property. However if all discounts should be time limited and provision of evidence required before any consideration of extension
5. At a time when resources are under pressure, should the Council provide some level of resource towards tackling the highest priority empty homes?	The Council should provide some level of resource to bring empty properties back into use, given the strong need for affordable homes – not just the highest priority empty properties. We would also add that considering Appendix A which provides data on empty homes by parish lacks data value in that 1003 homes have been empty between 6 months and 5 years. This should be broken down to show empty at 6 months, 1 year, 2years, and then 5years.
	Head of Service comments Analysis of data at different time values is possible but presentation may have been “messy”. The intention was to provide a snapshot of data.
Please provide any further comments here or separately.	We consider that this strategy is a weak strategy, and reflects the current low priority given to empty properties until they become a social problem. We fully understand the current economic situation however a strategy should reflect the longer term view of empty properties not current exigencies.
	Head of Service comments It is disappointing that the strategy is perceived as weak. It attempts to move from a low intervention base to a more pro-active and harmonised approach within the context of scarce resources. The strategy recognises that empty homes are a wasted resource, particularly in the context of housing growth, but the extent of intervention has to be set and balanced in the context of resources available.

This response is from: ASPLEY GUISE PARISH COUNCIL,
molly.fitz@hotmail.co.uk

Part C Audit Commission feedback comments on draft empty homes strategy

Comment - The empty homes strategy is weakened by a lack of comprehensive understanding of why homes are empty

Response – this issue is recognised within the strategy itself. In addition, the owners of homes that have been empty longest have been asked to complete a questionnaire for response prior to adoption of the strategy, so that this information can be incorporated into the strategy.

Comment – empty homes data is “reasonably well collected”, with plans to improve the approach.

Response – as above

Comment – 35% of MOD properties are empty, but this and the MOD has not informed the strategy

Response – CLG have recently announced an initiative to offer empty MOD properties to local authorities for ex service personnel presenting themselves as homeless. MOD contacts were provided and the Council have begun making contact with MOD. However, this initiative is only really an option where there is a demand for accommodation from ex-service personnel, and where those empty homes are not allocated to servicemen currently working overseas.

Comment – the empty homes strategy action plan is under developed and not SMART.

Response – the action plan will be reviewed against the Central Bedfordshire Council Guide to Developing Strategy and Policy with a view to improving the action plan before being presented to Members in October and November.

Comment – the Audit Commission see the provision of capital funding for Loans Assistance and empty dwelling management orders as a strength for the council’s approach.

Response – agree but this is obviously subject to availability of capital resources in difficult times for Central Bedfordshire Council

Comment – the Audit Commission see the framework agreement signed with Pathmeads Housing Association as a strength for the council’s approach.

Response – agree, the services offered by Pathmeads are essential for EDMO progress

Comment – the number of long term empty homes is seen as negative and a result of a lack of a long term (historical) sustained approach to reducing numbers of empty homes

Response – agree but the new strategy for Central Bedfordshire Council will itself provide the direction for a sustained approach going forward

Comment – the Audit Commission feel that promotional activity in relation to empty homes is not maximised or analysed to assess what is most cost

effective. An example provided is working with the local media to highlight empty homes problems. The information on the Council's website is also in need of improvement to better inform customers, both owners and neighbours of empty homes.

Response – agree, but activities are already planned to improve publicity. This includes participation in National Weeks of Empty Homes, working with Village care schemes, promotion at Health related and Older Persons events in autumn 2010. Plans to improve the Housing pages on the website have been made.