



18<sup>th</sup> October 2008

The latest selection of news of interest to Empty Property Practitioners. If you want a news item published here or on the website please contact [news@naepp.org.uk](mailto:news@naepp.org.uk). If you are not a member of NAEPP and want to join, please create an account by [registering here](#).

### CLG starts consultation on housing data

Following the meeting between NAEPP and CLG on 17<sup>th</sup> September to discuss the government's plans to revise the collection of empty homes statistics, CLG has now started its formal consultation on local authority Housing Stats returns.

The review is of course much wider than empty homes statistics, covering as it does all aspects of the Housing Strategy Statistical Appendix (HSSA) and Business Plan Statistical Appendix (BPSA) and, in the case of empty homes, the Council Tax Base (CTB) returns).

#### The survey of members' views

We had reasonable feedback from NAEPP members to the survey conducted in early September about the first draft of CLG proposals. (Thanks for those of you who took the time to respond). Outline NAEPP proposals were accepted by the majority of people.

In particular, there was general enthusiasm for authorities being required to report on their empty homes work - effectively a replacement for BVPI64 but without the competitive "performance measurement" aspect. Views about whether the threshold for reporting successes with long-term properties should be set at 6 or 12 months were slightly more in favour of 12 months.

Members were also keen to see consistency in the counting and reporting of second homes and - in the absence of a more robust methodology - broadly supportive of an approach that would allow furnished empties to be treated as second homes only if they had been empty for more than 12 months (thus ensuring transactional furnished empties would continue to feature in the overall number of empty properties).

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#### CLG housing data consultation (continued)

Members expressed concerns about the accuracy of council tax records as a basis for counting empties but mostly accepted there was little alternative. Members were happy to endorse the idea that data such as RSL empties could be derived from other sources but there were strong issues with CLG's apparent willingness to allow "other public sector" empties to be rolled in with private sector empties.

#### The meeting with CLG

All the key points were raised by us in our meeting with CLG in September. **These have been collected together in what is effectively a consultation response that is now available on the NAEPP website.** You won't need to log in to access the document which is at <http://naepp5.planetdrupal.ca/node/458>

#### Second homes bombshell

CLG did drop one bombshell that is relevant to the consultation. We were told that **CLG is already reporting empty homes statistics to Parliament from CTB (council tax) returns.** Or - to look it another way - they have **not** been reporting from the HSSA returns that many empty homes practitioners will have been involved in completing. We don't know when this change came in but we will be trying to find out, if necessary by an FOI request.

The main implication of this is that **CLG has already been using the Council Tax definition of "second homes" in calculating the headline total of empty homes** (bearing in mind that second homes are excluded from the total and that CLG would have no other source of information to rely on, as the estimated number of second homes is not reported in HSSA).

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### Second homes bombshell (continued from p1)

A key part of NAEPP's agenda has been to get an appropriate and consistent definition of "second homes" into use. **We strongly deprecate the use of the Council Tax definition of second homes** as it clearly includes properties that are not, by any common sense definition, "second homes" (eg furnished properties in the private rented sector that are empty between lets)

Moreover, it is a definition that cannot be consistent with the criteria that local authorities would have been using historically in their HSSA returns: thus switching to the Council Tax definition of second homes will surely have led to a reduction in the headline figure for empty homes. This in turn lays the government open to the criticism that it has manipulated empty homes statistics.

### Making your voice heard

**The consultation lasts for only two weeks, closing on Friday 31<sup>st</sup> October** so there is limited time to become involved.

The first job, if you want to influence the outcome, is to **find out who is co-ordinating the consultation process within your council.**

As far as we are aware, consultation is via emails to "stakeholders" - we assume there'll be at least one stakeholder per authority. There is **no** publicly available consultation mechanism that we have been able to identify: for example there is no consultation listed on the CLG website. The most likely recipient of the email within your authority is likely to be whoever is responsible for submitting the HSSA and BPSA returns. On arriving at your authority the consultation could well get split several ways, particularly if you are a stock-holding authority: housing strategy, homelessness, housing management, private sector housing. There are 6 themes in all.

### What needs to be said

We encourage you to take on board the points NAEPP has made to date and we hope that you will successfully get your local authority to incorporate into its response views that will

- produce robust data about empty homes
- recognise the importance of empty homes work

The key points we think need to be picked up by CLG are stated in the column overleaf. We will shortly produce a draft response document that may help you with your own response document.

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### Key points for consultation responses

We think the key points that need making are:

1. we broadly welcome the proposal to use Council Tax data as the basis for empty homes statistics
2. we broadly welcome the use of other data sets such as the RSR (housing association returns) to reduce duplication and lift the burden on local authorities
3. we do not agree that "other public sector" dwellings should be rolled in with private sector dwellings in either the total dwelling stock or in the count of empties
4. instead, we propose that all public sector agencies should submit returns to the government of their total number of dwellings and of transactional and long-term empties and that these returns should be at local authority level
5. council-tax-derived data about empty homes needs to be supplemented with data from Valuation Offices about dwellings removed from valuation lists and the reasons for doing so (eg empty and uninhabitable)
6. we do not understand or see any justification for requiring local authorities to continue to report separately on "private sector" dwellings and empties if figures are to be produced from other data sets such as CTB and RSR; this seems duplication and likely to lead to inconsistency between CLG figures produced from one data set and LA figures produced from others (eg RSR data would not be available at the time of completing HSSA returns)
7. we think if "second homes" are to be excluded from the total count of empty homes, the criteria should not be all "furnished empties" as defined in Council Tax, but instead should be a sub-set of that cohort
8. we believe that there should be consistency between the exemption categories that apply to EDMOs and those used in reporting empty homes as local authority level
9. we strongly believe that local authorities should report their activities in bringing empty homes back into use and that successes should be segregated by how long properties were empty prior to re-occupation; the criteria to be used should be based on the NAEPP *BVPI64 Guidelines*