1. What, in your view, are the main causes of empty homes?

Before looking briefly at this question we would stress that not all empty homes are a problem, it is poorly maintained empty homes that impact on the amenity of neighbourhoods and long term empties that impact on local housing markets and housing shortages.

With these comments in mind it is difficult to generalise about the causes of empty homes, each home has its own story and each owner their own set of reasons, challenges or obstacles that result in the property remaining empty. The experience of ALACHO members is that whilst there are some common factors including:

- disputes within families following the death of an owner or relationship breakdown;
- fire damage where the owners is uninsured;
- difficulties in getting agreement to common repairs needed to bring a property to a habitable condition;
- a reluctance to sell in slow or flat markets where the price may not meet expectations;
- the cost of works to bring a property up to a reasonable standard for letting or selling sometimes made more problematic by vandalism or other damage whilst the property is empty; and
- a lack of confidence on the part of owners who may need advice and support to progress the necessary works.

Reasons will vary between urban and rural areas and in particular across remote and island communities where empty homes can be closely associated with population decline and market failure.

Whilst it is important to understand the local drivers of empty homes from a strategic point of view, the day to day work of supporting owners to bring them back into use is a bespoke activity that will require a specific response in each instance.

In these circumstances what is most important is a clear focus on working with owners to bring homes back into use and a variety of tools and policy options that can be adapted to each specific circumstance.

2. Is this a problem which affects all tenures of housing? Please provide further information to explain your answer.

The short answer to this question is yes. Problematic empty homes can arise in all tenures including social housing. However, in social housing there are mechanisms to address problem where they arise both through the governance structures of
housing associations and Councils and the activities of the Scottish Housing Regulator.

As a practical policy issue, it is empty homes in the private sector that are of most concern, and more particularly those that are impacting on the amenity of the area and the safety of its residents.

3. What is the impact on communities in areas where there are large numbers of empty homes?

Broadly speaking there are two main types of impact, those relating to the appearance, amenity and attractiveness of an area as a place to live. This can include:

- impacting on the value or marketability of owner occupied or rented property;
- creating or reinforcing stigma;
- attracting antisocial behaviour and vandalism;
- creating an impression of neglect and disrepair that can impact on the satisfaction and wellbeing of residents; and
- health and safety risk where properties are insecure or attract vermin.

And the loss of much needed homes in areas of shortage or rising demand.

Either impact should be sufficient grounds to prompt action by public authorities to bring a property up to standard and back into use.

4. Is the issue of empty homes a problem in particular areas and if so, why?

Empty homes can occur in any community and any type of housing, but they are most problematic where there are even quite small concentrations; in areas that already face problems with property condition or stigma or where housing shortages are particularly acute, and choice is already limited. Urban and rural Areas were low demand and low value are a factor are most likely to be affected by problematic empty homes.

But they can also be a symptom of market failure, economic decline or a falling population.

Empty homes in rural and island communities can be particularly problematic but in every case it’s important that the response is locally driven, specific to that community and that situation and sensitive to the views of the wider community.

What ever causes a home to lie empty long term it’s unlikely that a “one size fits all” approach will be appropriate.

5. Are you aware of any areas which have made progress in addressing the issue of empty homes and if so, what other local authorities could learn?

ALACHO is aware that a number of local authorities and the Shelter have also responded to this consultation and have provided examples of good practice and
effective action to bring empty homes back into use. We hope these submissions provide the range of good practice examples that the Committee is looking for.

We share the view of Shelter that a dedicated Empty Homes Officer can be a key resource and an important catalyst to create a focus on empty homes. However, we are also clear that how empty homes are tackled, and the priority given to the activity in a period of limited and reducing resources is a decision that should be taken locally as part of the wider Local Housing Strategy. As we have already noted, a one size fits all approach is unlikely to be successful and where the problem is significant the communities themselves should be involved in designing and delivering solutions.

6. How effective are current tools open to local authorities/central government to deal with empty homes? Should they have more powers?

The tools available have improved in recent years and in particular the greater flexibility to impose higher rates of Council tax and/or suspend such a surcharge whilst a property is being improved have been particularly effective.

The support provided through the Empty Homes Partnership has been important in supporting local authorities to prioritise work to bring empty homes back into use.

There are also some examples of low interest loans and grants being used to good effect. However, we do not think that direct subsidy for owners is an appropriate use of public money, we would hold to the view established early in the life of the reconvened Scottish Parliament that the responsibility for the maintenance of privately-owned homes sits firmly with the owner. If they are not capable of meeting that responsibility, for what ever reason then the appropriate next step is to move the property on to an owner that can.

We are also aware of a widely held view that, despite significant work by the Scottish Government to improve the process, Compulsory Purchase Powers (CPO) are slow, cumbersome and risky. We think that more use could be made of CPOs if Councils had more confidence in the likely outcome and the time the process is likely to take. But we also think Councils, both officials and elected members are concerned about adverse public comment in the press and on line where there is a perception that CPO powers are being used to infringe the rights of owners.

In this context we are of the view that a clearer lead around the importance of public policy objectives and their relationship to private rights would be helpful. We need to be clear and have the confidence to say, that it is not OK or an owner to sit on an empty home, depriving others of a place to live and damaging a local community and where these situations arise it is a legitimate function of a local authority to take control of that property and see that it is returned to use.

7. Should there be more enforcement powers for local authorities/central government to deal with the issue? If so, what could these be?

We agree with the widely held view that the long-promised introduction of a Compulsory Sales Power would be a useful addition to the range of powers that already exist. But we would repeat the comments made in other submissions that
such a power must be relatively quick and uncomplicated to operate and appeals against their use should be dealt with as swiftly as practicable.

8. Is there enough information/data to provide an accurate picture of empty homes in Scotland? If not, how could this be improved?

On the assumption that it is kept accurate and up to date the council tax register should provide sufficient information to identify and track empty homes and in particular to focus on those that are empty long term.

However, we are aware that some owners will seek to avoid any Council Tax surcharge by not declaring that a property is vacant. Some further thought on how this aspect of the system can be better policed would be helpful.

There are also a significant number of empty properties that are “unfit” for occupation including some that are subject to long standing Closing Orders that prevent them from being occupied. We think there is a case for re-examining these exemptions particularly where “unfit” properties have been unimproved over an extended period.

17 May 2019