EMPTY HOMES STRATEGY

2012 - 2017

Newcastle-under-Lyme Borough Council

Housing and Regeneration Services



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1. SUMMARY

The Empty Homes Strategy links with the Housing Strategy and Private Sector Housing Renewal Policy and aims to bring long-term empty dwellings in the Borough of Newcastle-under-Lyme back into use. Good partnership working with other service areas of the Council and with external partners as well as the co-operation of property owners is vital to ensure the success of the strategy.

Bringing homes back into use links into Government objectives; including creating sustainable communities, tackling low demand and market failure, tackling anti social behaviour, the provision of affordable homes and ensuring that homes meet a decent standard.

Within Newcastle Borough in 2011/12 there were 1,829 empty homes; 1,725 in private ownership, 102 owned by Housing Associations. 655 private homes were empty for more than 6 months of which 312 of those have been empty for more than two years.

The aim of the strategy is to bring empty properties back into use. To achieve this we have identified two key approaches:

- To provide encouragement and support to owners of empty homes to bring them back into use.
- To use appropriate enforcement action to bring empty homes back into use.







2. INTRODUCTION

All empty homes represent waste, financial expense and missed opportunity. They can blight communities, attract fly tipping, vandals and squatters and tie up the resources of the Council and the emergency services. Bringing empty homes back into use is also a sustainable way to meet future housing demand and helps to alleviate pressure to develop green field sites. Bringing long-term empty homes back into use has a positive effect on the whole community.

The number of empty homes in England has declined steadily from a high of 869,000 in 1993 to 660,000 in 2006 however the number had increased again in 2011 to 720,000. Currently 279,000 of empty homes in England are long-term empties of six months plus. There remains a significant and long standing problem of empty homes, particularly those in the private sector which accounts for over 80 per cent of all empty homes.

How to distinguish an empty property

There is no widely accepted definition of an empty property and a range of terms, such as



vacant and redundant are also often used. Generally speaking, a vacant dwelling is defined as a unit of residential accommodation that is empty at a particular point in time. This includes dwellings that are empty between change of occupants or undergoing modernisation, repair or conversion, or awaiting demolition, or newly completed but not occupied. Due to this wide definition, true 'empty properties' are not always as straightforward to identify as it may seem. For example:

- A home which appears empty may be a person's second home and occupied infrequently.
- An empty property may have been earmarked as part of a regeneration programme and demolition may have already been planned.
- Properties could be empty pending planning consent, refurbishment or whilst awaiting the new resident to move in.
- There may be sign of occupation but this may be from squatters.
- A property may be occupied but the garden may be overgrown and the home neglected.

Guidance contained in the ODPM Implementation Handbook (2003, p17) states that empty properties are those that;

- have been unoccupied for six months or more;
- have been unoccupied for less than six months and are a special case ie. Legal action is being taken by the Local Authority as a result of serious disrepair or other problems being caused by the property;
- are occupied, but the space is capable of more beneficial use;
- do not have a reasonable prospect of being brought back into use by the owner

working alone.

Information can be obtained from Council Tax records for the purpose of identifying vacant dwellings and for taking steps to bring vacant dwellings back into use.

Reasons why dwellings become empty

Individual factors:

- Unresolved ownership usually following the death of the owner.
- Bankruptcy of owner.
- Relationship breakdown.
- Owner may be institutionalised hospital, prison etc.
- Lack of expertise in property and tenancy management.
- The owner may not be aware of the property's existence.

Property factors:

- The property may have been acquired solely for speculative investment purposes.
- The owner may not fully appreciate the financial benefits of bringing the empty property back into use.
- Poor property condition where the costs of bringing the property back into use may be prohibitive, relative to the income that could be generated.
- · Repossession.

Housing Market Factors:

- · Low demand.
- Housing market collapse repossession, negative equity.
- Over supply of certain property types.
- Area regeneration may result in properties being empty pending renovation or demolition.
- Slow property sales.

The negative effects of empty property

These include:

- wasted financial resources for the Council and also for the owners;
- increased dereliction, vandalism, litter and other anti social behaviour;
- reduced market values in neighbouring properties; contributing to a spiral of decline
- reduced demand for goods and services in the area:
- · waste of useful and much needed units of accommodation.



The benefits of this Strategy

The re-use of empty homes brings financial and social rewards to the Council, private owners and the community in the following ways;

Council:

- provides greater housing choice, whether this be through housing sales or rental;
- improves/restores older buildings and homes to modern standards;
- provides a range of good quality homes for people in need of affordable rented property;
- generates additional revenue through Council Tax;
- prevents properties from falling into disrepair and becoming a focus of vandalism and anti-social behaviour;
- reduces the need to build new dwellings on Greenfield sites.

Community:

- prevents empty properties becoming the focus of anti social behaviour;
- improves market values in neighbouring properties and the local area by reducing a spiral of decline.

For the purpose of the strategy, efforts will principally be focused on the problematic properties which are usually those houses which are inactive in the housing market, often in poor condition and empty for six months or more. This definition usually allows enough time for market forces to return an empty property into use without intervention from an external agency.

3. STRATEGIC FRAMEWORK

The Empty Property Strategy and it key components have been developed to reflect national regional and local housing strategies and polices.

National Context

Bringing homes back into use into use links into wider Government objectives including; creating sustainable communities, tackling low demand and market failure, tackling antisocial behaviour, the provision of affordable homes and ensuring that homes meet a decent standard. The following Government documents reflect this.

In May 2010 the Coalition Agreement set out a commitment to look at a range of measures to bring empty properties back into use. It was recognised that potential empty homes could meet pressing housing need, if these homes were brought back into use.

Laying the Foundations a Housing Strategy for England 2011

The coalition government's new housing strategy *Laying the Foundations* a Housing Strategy for England identifies the importance of returning empty homes stating:

"We are committed to bringing empty homes back to use, as a sustainable way of increasing the overall supply of housing and reducing the negative impact that neglected empty homes can have on communities."

This strategy outlines a number of objectives including:

- award of the New Homes Bonus to encourage local authorities to increase housing stock;
- providing information and advice to deal with empty homes; investing £100million to enable housing associations to support local authorities to bring over 3,000 empty homes back into use as low cost housing;
- · consultation on Council premium for long term empty homes;
- proposing changes to EDMO's to tackle the worst long-term empty homes."

• Housing Act (2004)

The Housing Act 2004 provides local authorities with new powers to tackle long term empty homes. It introduced Empty Dwelling Management Orders to enable local authorities to take over the rights and responsibilities of the owner and to refurbish and rent out the property without becoming the legal owner.

The Act also introduced the Housing Health & Safety Rating System to access hazards in dwellings and a new power of selective licensing to target areas suffering from low demand and/or high levels of anti-social behaviour.

Local Government Act (2003)

This legislation allows information to be obtained from Council tax records to be used for;

- a) identifying vacant dwellings;
- b) taking steps to bring vacant dwellings back into use.

The Act also allows local authorities to reduce or remove entirely discounts for homes that have been empty for over 6 months.

• Technical reform for council tax: Summary of responses report

The Government have recently consulted on Council Tax technical reforms. The proposals advocated give billing authorities greater discretion over the reliefs from Council Tax available in respect of some empty properties. The proposed changes affecting empty homes are:

 replacing exemption Classes A and exemption classes C with discounts, the amount of which would be for billing authorities to determine

- abolishing Class L exemption and making mortgagees in possession of empty dwellings liable to Council Tax in respect of them
- allowing billing authorities to levy an 'empty homes premium'.

National Planning Policy Framework (2012)

"Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate."

Unlocking the Potential(2003)

This is guidance issued by the Office of Deputy Prime Minister aimed at owners and local authorities to bring empty homes back into use.

Regional and Sub Regional Context

The Borough Council together with Stoke on Trent and Staffordshire Moorlands Councils' form the recognised 'sub region' of North Staffordshire. Bringing empty properties back into use is essential in the restructuring of the housing market and will be encouraged by market renewal.

Stoke-On-Trent city council has adopted enforcement policies to deal with problematic empty properties where the owner does not engage with their officers to bring the properties back into use. They have successfully used Compulsory Purchase Orders and are in the process of adopting an Enforced Sales policy.

Local Context

Corporate Plan

The future priorities for the Borough are contained in the Corporate Plan 2012-13 to 2012-15 which sets out the vision and outcomes for the next five years. The empty property strategy has a particularly important contribution to meeting some of the priorities outlined in the Corporate Plan. In particular;-

- Creating a Cleaner, Greener and Safer Borough-by reducing dereliction, vandalism, litter and anti social behaviour such as damage, theft and arson.
- Creating a Borough of opportunity- by improving market values and the attractiveness of areas adjoining vacant homes reducing a spiral of decline and helping increase the number of residents who feel the Council is making the area a better place to live.

- Creating a Healthy and Active Community –by ensuring access to a range of quality homes.
- Transforming our Council to achieve excellence by working in partnership with relevant organisations to deliver dwellings which can be occupied.

Housing Strategy

This policy contributes to the following objectives in the councils housing strategy:

- To contribute to the prosperity and sustainability of Newcastle bringing empty homes back into use will improve neighbourhoods.
- To meet housing needs and develop housing choice for Newcastle Residents bringing empty properties back into use will improve choice of housing within the Borough.
- To support vulnerable people and prevent homelessness in the Borough of Newcastle-Under-Lyme bringing empty homes back into use will increase the supply of housing within the Borough.

4. EMPTY PROPERTIES IN THE BOROUGH OF NEWCASTLE -UNDER -LYME



The Borough of Newcastle-under-Lyme covers an area of 210 square kilometres with an estimated population of approximately 124,000. It is the second largest of Staffordshire's eight district council authorities, excluding Stoke-on-Trent, which is a unitary authority.

The Borough contains both high quality countryside and pockets of urban settlements, some of which show signs of deprivation. The Indices of Deprivation (source DETR 2011)

place three of the Borough's wards in the 10% most deprived in England. These are Knutton and Silverdale, Chesterton and Cross Heath. A further nine are in the 20% band.

The housing stock consists of approximately 52,000 dwellings, of which 74% are owner-occupied, 22% in the ownership of Registered Social Landlords (including the Council's former housing stock which was the subject of Large Scale Voluntary Transfer in 2000) and 4% in the private rented sector. Approximately 35,000 of the dwellings were built after 1944, 10,000 dwellings were built between 1919 and 1944 and almost 7000 dwellings prior to 1919.

In 2011 according to Housing Investment Programme, data submitted by the Local Authorities in Staffordshire there were a total of 16,658 empty homes in the county which represented 3.49% of the total stock. Of these homes 37% (6,188) were privately owned and had been empty for more than six months.

Table 1 – Empty Properties in Staffordshire by Local Authority 2011

County	Local Authority/Borough		Total empty homes	% of homes empty	Local Council	Housing Association	Other Public body	Private inc Landlords	Private homes empty more than 6 months
Staffordshire	Cannock Chase		1,067	2.56%	44	17	0	1,006	383
	East Staffordshire		1,734	3.57%	0	54	0	1,680	700
	Lichfield		1,258	2.93%	0	48	28	1,182	514
	Newcastle-under-Lyme		1,829	3.37%	2		0	1,725	655
	South Staffordshire	*	1,218	2.67%	0	54	3	1,161	450
	Stafford	*	1,806	3.21%	0	34	9	1,763	800
	Staffordshire Moorlands		1,816	4.22%	0	39	3	1,774	825
	Stoke-on-Trent	*	5,196	4.59%	502	156	0	4,538	1,570
	Tamworth		734	2.30%	36	3	0	695	291
Total		*	16,658	3.49%	584	507	43	15,524	6,188

Source Empty Homes Agency * Figures in italics are based on incomplete figures provided by local authorities and are lower than actual totals

Within Newcastle Borough in 2011/12 there were 1,829 empty homes; 1,725 in private ownership, 102 owned by Housing Associations. 655 private homes were empty for more than 6 months of which 312 of those have been empty for more than two years.

As table one shows, the total percentage of homes empty in the Borough was 3.37% which was lower than the neighbouring North Staffordshire authorities of Stoke and Staffordshire Moorlands.

5. AIM AND KEY APPROACHES

The aim of the strategy is to bring empty properties back into use. To achieve this we have identified two key approaches:

- To provide encouragement and support to owners of empty homes to bring them back into use.
- To use appropriate enforcement action to bring empty homes back into use.

6. DELIVERING THE STRATEGY

To achieve the aim of bringing empty homes back into use we will consider the following key elements:

- The length of time the property has been empty, with officers focussing on those empty for more than 6 months,
- If the property is having a negative impact in the area
- If the owner is taking steps to deal with the problems and return the property back to occupation.

As outlined in the Introduction there are many reasons why properties become empty. It is important, therefore, for the Council to be able to offer solutions to suit the individual circumstances. This flexible approach is shown in the procedure flow chart for dealing with empty properties – see Appendix 2. Initially advice will be provided prior to taking enforcement action (unless there is a serious safety issue).

First Approach: To provide encouragement and support to owners of empty homes to bring them back into use

Knowledge of empty homes

The Council may become aware of the existence of empty properties through various routes including;

- Council tax records.
 - Complaints usually from residents,
- Residents Associations active in an area,
- Council officers working in the Borough,
- Owners/landlords requesting help or advice.

It is essential to maintain a good knowledge of the location and type of empty homes in the Borough. Whilst we use the Council Tax records to update information held on problematic properties we recognise that these may not be fully accurate for our purpose. We will therefore use the APP database to register empty properties for which we are taking action against, this enables officers to keep up to date records of the property and possible reasons why the property is empty or if works are being undertaken.

Awareness raising

It is appreciated that there is a need to raise awareness of issues and problems associated with long-term empty property issues and provide more publicity about the strategy and our approach to tackling empty homes.

Through raising awareness of the issues of empty properties and encouraging home owners to think about the future of their empty properties we will seek to ensure that home owners make decisions leading to the use of the property rather than leaving them empty.

Advice and Assistance

Where owners of short term empty properties ask for help we will visit and provide advice and assistance.

We maintain a comprehensive section on our website for issues relating to housing. This site is updated with changes in legislation, topical issues and has direct links to specialist sites. Additional and relevant information concerning empty homes will be posted on this webpage and kept updated.

We currently write to owners of empty properties which have been included on our database as being the subject of complaint and then offer appropriate advice and assistance. As part of this correspondence we will send out a questionnaire to all owners of long term vacant homes to find out what these owner's intentions are so that our advice can be appropriate to the issues facing the owner.

In some cases owners are not able to deal with the property. We will provide advice to help owners to sell their properties. In particular where the owner wishes we will refer them to a Housing Association for it to purchase the house and then improve, let or sell it. As part of our promotion of the issues surrounding empty homes and to encourage either purchase or management lettings we will promote tackling empty homes with private landlords through the landlord forum and our database of accredited landlords. We will also investigate creating a webpage where owners can advertise their empty properties for sale to potential purchasers.

Where an owner requires assistance in finding building contractors that meet minimum standards we will provide information through the Home Improvement Agency.

Second Approach: To use appropriate enforcement action to bring empty homes back into use.

Whilst, whenever possible, voluntary measures will be used to encourage owners to bring properties back into use, it must be recognised that in some cases owners will refuse to co-operate and enforcement action will be necessary.

The statutory action which can be taken will depend upon the condition and location of a property and the circumstances of the owner. Properties in a poor condition which are a hazard to the health and safety of the public will be a prime target for enforcement action.

The available options for enforcement are:

Building Act 1984 Section 77- enables the Council to deal with buildings that it considers to be dangerous. It can apply to a Magistrates' Court for an order requiring the owner to make the building safe or demolish it.

Building Act 1984 Section 78- allows the Council to deal with buildings that pose an immediate danger. This emergency measure allows the local authority to carry out remedial works itself without giving the owner the opportunity to deal with it himself. The Council is only entitled to carry out works that remove the danger.

Building Act 1984 Section 79 – This empowers the Council to deal with ruinous and dilapidated buildings or structures and neglected sites and if necessary carry out work in default

Environmental Protection Act 1990 Sections 78-81-allows the Council to require the abatement of statutory nuisances. The term statutory nuisance applies to a range of problems that might arise from empty homes, including accumulations of rubbish or dampness affecting neighbouring properties. The Council can serve an abatement notice on the owner of the premises requiring works to abate the nuisance and if the notice is not complied with can carry out works in default.

Housing Act 1985. **Section 17**- allows the Council to acquire under-used or ineffectively used property/land etc for residential purposes if there is a general housing need in the area through compulsory purchase.

Compulsory Purchase is perhaps the strongest power available to tackle empty homes. It is not, however, a power that rests with the Council and it must apply to the Secretary of State for an order to be made. The whole process is drawn out complex and resource intensive as the Council will need to demonstrate that there is a compelling case in the public interest for the property to be compulsorily purchased, and that other methods of returning the property to use have been tried and have failed. In addition, the Council will need to show that it has clear intentions for the use of the property/land and be able to show that it has the necessary resources available to go through with the Compulsory Purchase Order. This means that compulsory purchase will be a method of last resort.

Housing Act 1985 Part 9-gives the Council powers to make Demolition Orders and Slum Clearance Areas to require the demolition of individual or groups of unsafe houses where that is the most satisfactory course of action

Housing Act 2004 Part 1-requires the Council to serve a notice to deal with category one hazards to which a member of the public may be exposed to.

Housing Act 2004 Section 132 –138-allows the Council to over the management of an empty property, undertake works, let out the property and collect rent. The Council must notify the owners of its proposal and try to work voluntarily to find an acceptable solution. Only if no agreement can be reached can the Council seek approval to make an Interim Empty Dwelling Management Order initially for 12 months. If agreement is still not possible a final order, which can last for 7 years, can be made. The process is time consuming and will require the Council to prepare a plan as to how it intends to manage any property throughout the duration of the Order.

The Council will develop a process for using such Orders and consult with Housing Association partners to determine the most practical way of carrying out and delivering the

management of a scheme. It is anticipated that providers will competitively tender to manage such properties on a one to one basis ensuring value for money in terms of management costs and that any particular issues with the property are considered on an individual basis.

Law of Property Act 1925 –the Council can force the sale of an empty property where abatement notices have been served and the work has been carried out in default by the Council. An enforced sale can only be pursued if the cost of the default works is comparable with the market value of the property.

Council Tax (Administration and Enforcement) Regulations 1992 – the Council can also force the sale of an empty property where council tax debt is owed. The council can apply for a charging order then force the sale of the property to recover the debt.

Local Government (Miscellaneous Provisions) Act 1982 Section 29- allows the Council to carry out works to an unoccupied building to prevent unauthorised entry or to prevent it from becoming a danger to public health. 48 hours notice is needed unless the works are required immediately

Town and Country Planning Act 1990 Section 215 -allows the Council to deal with unsightly land or the external appearance of property.

Town & Country Planning Act 1990 Section 226 (as amended by Section 99 Planning and Compulsory Act 2004) allows the council to acquire land or buildings if acquisition will allow improvements or redevelopment to take place provided the improvement, development, or redevelopment will contribute to the promotion or improvement or economic, social or environmental well being. This power can be used to acquire empty properties that adversely affect the street scene because of the dilapidated condition.

Longer Term Empty Homes

It is important that we recognise that the properties that have been empty for two years or more are targeted as these properties are most likely to be in disrepair and attracting antisocial behaviour.

We aim to visit all empty properties that have been empty for two years or more and write to the owners indicating any issues or complaints and offering advice and assistance in bringing their properties back into use. It is however acknowledged that if a home owner has refused to engage with the Council in the preceding 2 years then it is very unlikely that they will accept advice and return their empty property back into use. It is therefore anticipated that in all of these circumstances enforcement action under the relevant legislation outlined above will be taken.

7. RESOURCES

Staff

The key resource available to deliver the strategy is staff within the Housing and Enforcement Teams.

The lead positions for delivering are indicated on the action plan, the position of Technical Assistant is currently temporary so therefore the number of homes returned to use may be reduced if this post is not continued after March 2013. The overall responsibility for overseeing the implementation of the strategy will be the Housing Manager.

Budget

Staff time will be met from the Revenue budget. The amount of capital resources allocated annually by the Council will be dependent upon the Housing Capital Programme. This is funded through central Government and the Council's capital programme.

As highlighted in the Action Plan the Council will wherever possible seek to work in partnership with appropriate agencies to maximise expertise. Where opportunities arise the Council will seek to establish appropriate partnerships and make funding bids to secure external funding.

Where significant financial resources are required or compulsory purchase / enforced sale are recommended by officers then the case will be reported to the Public Protection Committee or Portfolio Holder for authorisation. As it can be costly to take action, whether by default or legal proceedings the Council will seek to keep costs to a minimum level and reclaim costs incurred from home owners.





8. MONITORING AND REVIEW

The Council monitors the number of private sector empty properties that are brought back into use or demolished during the year as a direct result of action by the local authority.

The out turn figures for:

- 2009/10 were 55 empty properties back into use,
- 2010/11 were 74 empty properties back into use,
- 2011/12 were 75 empty properties back into use.

The Council recognises that there is a need to consider empty properties in the form of those empty for more than 6 months and longer term empty properties which have been vacant for more than 2 years.

We aim to bring 75 empty properties of which 10 will have been empty for two years or more back into for each year of the Strategy.

Progress against targets are monitored within the Housing Service and reported quarterly through the Councils performance management framework.

This Strategy will be reviewed after 12 months to ensure that the approach and policies adopted are appropriate. A full review leading to the production of a new strategy will be undertaken in 2017.

9. CONSULTATION ON DRAFT STRATEGY

The Council will seek comments on the draft strategy as part of twelve weeks consultation in line with Council consultation best practice. The consultation will be promoted to ensure a range of internal and external views are gained, representations from the following range of external organisations will be sought:

- Empty property owners
- Landlords
- North Staffordshire Landlords Association
- Registered Housing Providers
- West Midlands Empty Property Group
- Citizens Advice Bureau

It is also intended that the draft Strategy will be considered by the Economic Development and Enterprise Overview and Scrutiny Committee as part of the consultation process.





10. ENQUIRIES

A copy of the Strategy and associated Policies can be obtained upon request from the address below or by visiting the Council's website at: www.newcastle-staffs.gov.uk

Newcastle-under-Lyme Borough Council, Civic Offices, Merrial Street, Newcastle-under-Lyme, Staffordshire, ST5 2AG.

Telephone 01782 717717 Textline 07800 1400 48

Email: housing@newcastle-staffs.gov.uk

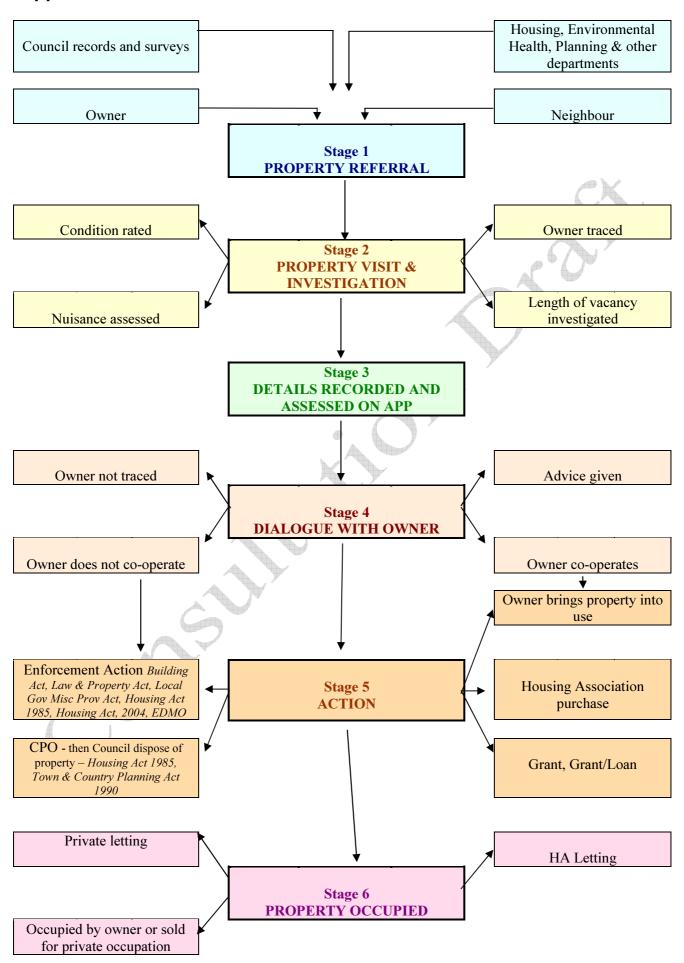
Appendix 1

EMPTY HOMES STRATEGY 2012 / 2017 ACTION PLAN

Actions	Target Date	Progress / Completed Date	Lead Officer	Outcomes
Review and update current publicity material.	March 2013		Housing Standards Officer	
Publicise through the Councils newspaper and website the importance of bringing empty properties back into use.	Annual articles		Housing Standards Officer	Increased awareness of empty property issues in the Borough. Owners making decisions and taking action to stop homes becoming vacant, thus
Share empty property information at landlord's forums.	Ongoing	Ongoing	Housing Standards Officer	preventing the problem.
Investigate options to support home owners to sell their empty properties, including potential web based marketing.	Aug 13		Technical Assistant	Home owners assisted to dispose of empty properties with the aim of enabling someone to utilise them.
Review the Strategy, in particular the reasons for empty homes and to ascertain if area based intervention and enforcement is required	January 2014	There is no evidence at present to take this approach.	Housing Standards Officer	Areas with concentrations of empty homes targeted where appropriate.
To maximise cross department working to ensure that empty properties are appropriately tackled using the correct legislation and up to date information.	On-going		Technical Assistant / Housing Manager	A more coordinated approach to empty home work, utilising the best approaches for
Continue to research and share good practice with other local authorities.	August 2014		Housing Standards Officer / Technical Assistant	each property.

Explore funding options for grants and/or loans and link in to National Funding Schemes	On going		Housing Standards Officer	To maximise opportunities for property owners and ensure services are delivered in a cost effective way.
Respond to complaints concerning empty homes	Ongoing	Ongoing	Housing Standards Officer / Technical Assistant	Ensure that neighbouring residents don't suffer from the problems associated with empty properties.
Contact owners of owners of problematic empty homes or homes empty for more than 6 months to provide advice and assistance.	Ongoing	Ongoing	Housing Standards Officer / Technical Assistant	Owners of empty homes are supported and encouraged to bring them back into use.
To take enforcement action against problematic empty homes or homes empty for more than 6 months.	Ongoing	Ongoing	Housing Standards Officer / Technical Assistant / Housing Manager	That empty properties are returned to use and problems effectively dealt with.

Appendix 2 DEALING WITH EMPTY DWELLINGS



Appendix 3 Enforcement policies

