Bridgend County Borough Council



Empty Property Strategy consultation 2018/19

Consultation report

Date of issue: 1 May 2019



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1. OVERVIEW

The Empty Property Strategy was developed to:

- Outline an approach to identify, prioritise and reduce empty private sector residential
 properties across the county borough and help contribute towards increasing the availability
 of housing for sale or for rent.
- Adopt an approach that seeks to work cooperatively with owners to bring their empty properties back into use.
- Consider the use of legislative powers where properties continue to remain empty and are in a state of disrepair, are detrimental or a nuisance to the community.

The draft strategy was available alongside the consultation document and the main aims and objectives of the strategy were detailed for consideration:

- Approach to identify and prioritise empty properties;
- Approach to provide help and assistance to owners;
- Approach to ensure effective communication is undertaken;
- Approach to Work closely with internal and external partners;
- Consider the use of enforcement action.

A public consultation outlining the strategy was undertaken over a twelve week period following the presentation of the strategy to Cabinet on 22 January 2019. A letter outlining the strategy proposals and details of the consultation was sent to all owners of empty properties across the county borough (Appendix one). This letter was sent to 1861 residents. The consultation received 109 (107 online and two paper) responses from owners of empty properties and the public. This paper details the analysis associated with the consultation.

2. INTRODUCTION

A public consultation based on Bridgend County Borough Council's Empty Property Strategy was conducted over a twelve week period between 1 February 2019 and the 28 April 2019. The survey was available to complete online on the consultation page of the council's website and residents could also request a paper copy or another alternative format by telephone or email. The survey was available in English and Welsh as standard and accessible versions.

In total, there were 12 questions which required a reply from respondents; all questions in the survey were optional. All survey responses offered the option of anonymity. The council's standard set of equalities monitoring questions were also included with the survey, as is now recommended good practice for all public facing surveys carried out by the council.

The content of the consultation remains available online in closed consultations.

Comments regarding the consultation were also invited via letter, email and phone call.

3. PROMOTIONAL TOOLS AND ENGAGEMENT METHODS

This section details the specific communications and engagement methods used to reach people and encourage them to share their views during the consultation period.

3.1 Social media and online



Facebook and Twitter have been used to promote the consultation.

Information was posted to the council's corporate Twitter and Facebook accounts throughout the consultation period to raise awareness of the consultation and to encourage citizens to share their views on the proposals. The council currently has 11,302 followers on its corporate Twitter accounts and 12,148 on Facebook. During the period, the authority 'tweeted' twice and the information was seen 4,306 times. One post was made to the council's Facebook page, which reached 7,444 people.

3.2 Local press

A press release entitled Council reveals strategy for bringing empty properties back into use was issued on 25 January 2019, and a further press release entitled Have your say on plans for empty properties was issued on 18 March 2019. These were covered in the local and national press as follows:

- 25 January 2019 Newsfeed Cymru
- Bridgend Council to consult on stricter empty homes policy
- 29 January 2019 Glamorgan Gem
- Plan to end council tax relief on empty properties
- 30 January 2019 Bridgend Gem
- BCBC 'finally to tackle the blight' of empty properties
- 1 February 2019 MSN website
- There are 1,200 empty homes going to waste in Bridgend and the council says that needs to change
- 6 March 2019 Wales Online / Glamorgan Gazette
- People with empty homes in Bridgend could be forced to sell them
- 30 April 2019 Oggy Bloggy Ogwr
- 1,500 empty properties: What is BCBC doing?





4. RESPONSE RATE

In total, there were 109 interactions, representing 0.08 per cent of the Bridgend county borough population. The response rate has been divided into several areas including: consultation survey responses, emails, letters and social media interactions:

- We received 109 survey responses in total (107 online submissions and two paper versions);
- During the consultation period, there were 12 comments on our social media channels;
- One comment was received by telephone;
- One letter was received (via email).

5. HOW EFFECTIVE WAS THE CONSULTATION?

The Empty Property Strategy consultation was conducted over an twelve week period during which a range of marketing methods were used to create awareness of the consultation and encourage members of the public to engage with the council.

The social demographic data reflects a good cross section of the county borough's population.

The data collection methods, which include the online survey, a paper survey and an accessible survey, were all developed using plain English to maximise understanding. These response methods were designed to give a consistency to the survey across multiple platforms.

6. HEADLINE FIGURES

- 98% of respondents stated that the strategy was written in plain language and was easy to understand;
- 97% of respondents felt that the strategy clearly explained why empty properties were a priority for the council;
- 95% of respondents said that the aims and objectives outlined within the strategy were the most relevant;
- 91% of respondents agreed with the council approach to identify and prioritise empty properties;
- 84% of respondents agreed with the councils approach for providing help and assistance to owners of empty properties;
- 90% of respondents agreed that the planned approach to ensure effective communication with owners and the public is appropriate;
- 94% of respondents agreed that working closely with internal and external partners is needed to deliver the strategy;
- 68% of respondents said that they agreed that the use of enforcement action was appropriate to deliver the strategy;
- 73% of respondents did not feel that there was anything missing from the strategy.



7. QUESTION AND ANALYSIS - CONSULTATION SURVEY

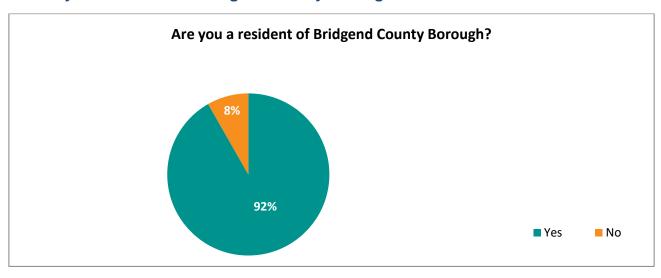
Section seven of the report looks at the questions asked in the consultation survey – with 109 respondents in total.

7.1 Please select a language to begin the survey.

Respondents to the consultation survey were initially asked in which language they would like to complete the survey. Overall, 99.1% of respondents selected English with 0.9% selecting Welsh.

Language	#	%
English	108	99.1
Welsh	01	0.9
Total	109	100.0

7.2 Are you a resident of Bridgend county borough?



92% (100) of respondents said they were a resident of the county borough, 8% (9) of respondents said they lived outside the county borough.

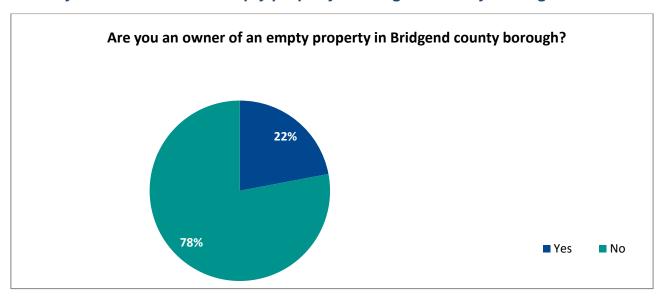
7.3 If no, where do you live?

The respondents who lived outside the county borough were asked where they lived. The following responses were received:

- Pembrokeshire;
- Vale of Glamorgan (2);
- Rhondda Cynon Taf (2);
- Cardiff;
- Torfaen;
- Monmouthshire.

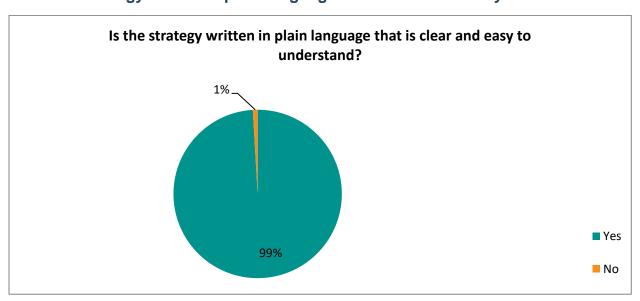


7.4 Are you the owner of an empty property in Bridgend county borough?



22% (24) of respondents were owners of empty properties in the county borough. 78% (85) were not empty property owners.

7.5 Is the strategy written in plain language that is clear and easy to understand?

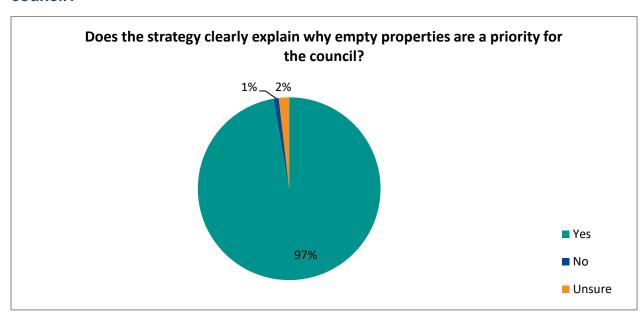


99% (108) respondents stated that the strategy was written in plain language and was easy to understand. 1% (1) stated that it was not.

Respondents who replied 'no' were asked to please tell us why. The one respondent who answered no to this question did not provide any further information.



7.6 Does the strategy clearly explain why empty properties are a priority for the council?



The graph shows that 97% (106) of respondents felt the strategy clearly explained why empty properties were a priority for the council, 1% (1) said that they strategy did not explain this and 2% (2) were unsure.

Respondents who replied 'no' or 'unsure' were asked to 'please tell us why'. The three responses are themed below:

	Number of
Theme	responses
Provided feedback on the consultation questions	2
More should be done to assist owners of empty properties	1

Response:

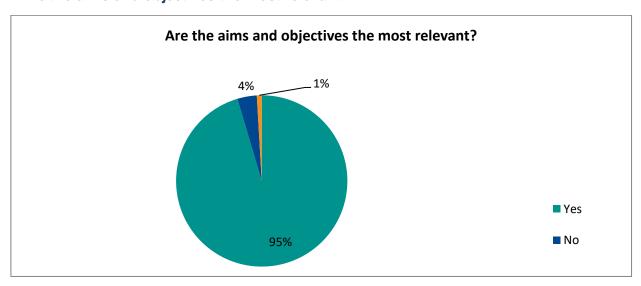
Comments noted

The Consultation Team have taken on board feedback and comments made in relation to the consultation questions

The Strategy sets out the many variable in dealing with empty properties and outlines the assessment process to determine priority properties



7.7 Are the aims and objectives the most relevant?



The graph shows that 95% (104) of respondents said the aims and objectives outlined within the strategy were the most relevant. 4% (4) of respondents said they did not feel the aims and objectives were most relevant and 1% (1) did not provide a response to this question.

Where respondents stated no, they were able to give reasons for their answer. Three responses were received and the responses are themed below:

Theme	Number of responses
Concentrate on alternative areas rather than just town centre	2
Provided feedback on the consultation questions	1

Response:

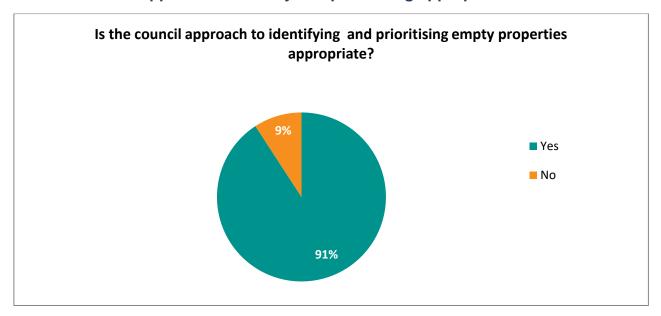
Comments noted

The Strategy sets out the many variable in dealing with empty properties and outlines the assessment process to determine priority properties and priority areas

The Consultation Team have taken on board feedback and comments made in relation to the consultation questions



7.8 Is the council approach to identify and prioritising appropriate?



The graph shows that 91% (99) of respondents agreed with the councils approach to identify and prioritise empty properties, 9% (10) of respondents did not agree with the councils approach to identify and prioritise empty properties.

Where respondents stated no, they were able to give reasons for their answer. Eight responses were received and the responses are themed below:

Theme	Number of responses
Provided feedback on the consultation questions	2
Property is privately owned so the council should not have the right to get involved	2
Concentrate on alternative areas rather than just town centre	1
Consideration should be given to properties being developed to be returned to	_
use	1
All circumstances are different and this should be considered	1
Properties are left empty for too long and the council have been too lenient	1

Response:

Comments noted.

The Strategy recognises the many variables in dealing with this issue and contains information on what steps are taken to prioritise properties and areas.



The Consultation Team have taken on board feedback and comments made in relation to the consultation questions

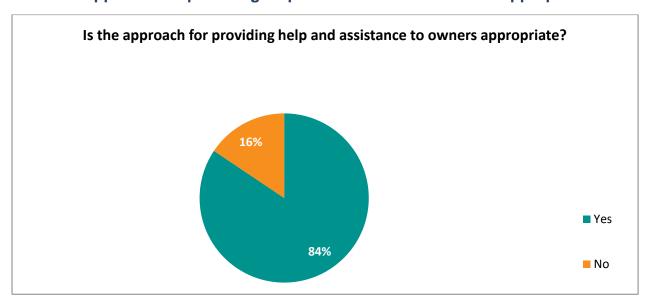
The Council has an obligation to ensure that Empty Properties are dealt with appropriately

The Strategy outlines the intention to bring properties back into use

The Strategy recognises that all circumstances are different and treats each case on a case by case basis

The Strategy is a statement of the Council's intentions to deal with empty properties currently and in the future

7.9 Is the approach for providing help and assistance to owners appropriate?



The graph shows that 84% (92) of respondents agreed with the councils approach for providing help and assistance to owners, 16% (17) of respondents did not agree with this approach.

Where respondents stated no, they were able to give reasons for their answer. 13 responses were received and the responses are themed below:

Theme	Number of responses
There is a need for more financial help	5
Owners should maintain their properties and fund these themselves	3
Should be higher council tax for empty properties	2
The council should force the sale of a property after two years	1



All circumstances are different and this should be considered	1
The process takes too long	1

Response:

Comments noted.

The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

Owners do have a responsibility to maintain their properties and the Strategy sets out the actions the Council will take to enforce this obligation. The Strategy also outlines the key steps taken to communicate and engage with property owners

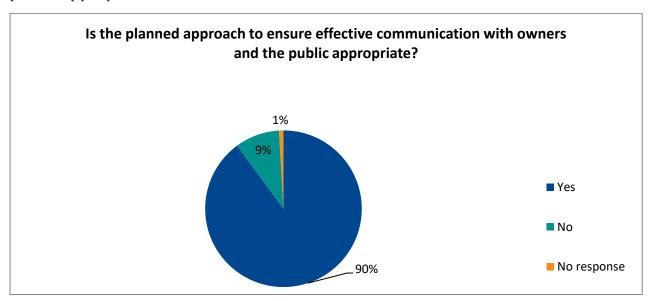
The Council has made changes to the level of council tax payable for empty properties

The Strategy sets out the enforcement options that are available to the council including enforced sale

The Strategy recognises that all circumstances are different and treats each case on a case by case basis

The Strategy sets out the different levels of actions that are undertaken by the Council

7.10 Is the planned approach to ensure effective communication with owners and the public appropriate?



The graph shows that 90% (98) of respondents agree that the planned approach to ensure effective communication with owners and the public is appropriate, 9% (10) disagreed and 1% (1) were unsure.

Where respondents stated no, they were able to give reasons for their answer. Eight responses were received and the responses are themed below:



Theme	Number of responses
Better communication about empty properties is needed	6
Property is privately owned so the council should not have the right to get	
involved	2

Response:

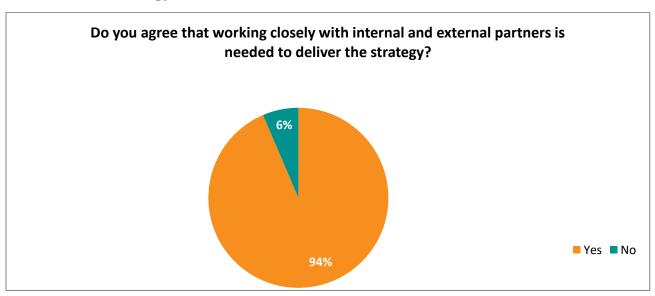
Comments noted.

The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

The Strategy also outlines the key steps taken to communicate and engage with property owners

Owners do have a responsibility to maintain their properties and the Strategy sets out the actions the Council will take to enforce this obligation. The Strategy also outlines the key steps taken to communicate and engage with property owners

7.11 Do you agree that working closely with internal and external partners is needed to deliver the strategy?



The graph shows that 94% (102) of respondents agree that working closely with internal and external partners is needed to deliver the strategy, 6% (7) disagreed.

Where respondents stated no, they were able to give reasons for their answer. Seven responses were received and the responses are themed below:

Theme	Number of responses
There should be less private business involvement	2



Provided feedback on the consultation questions	2
The council shouldn't end up with the costs associated with empty properties	1
Property is privately owned so the council should not have the right to get	
involved	1
"Internal partners are enough"	1

Response:

Comments noted.

The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

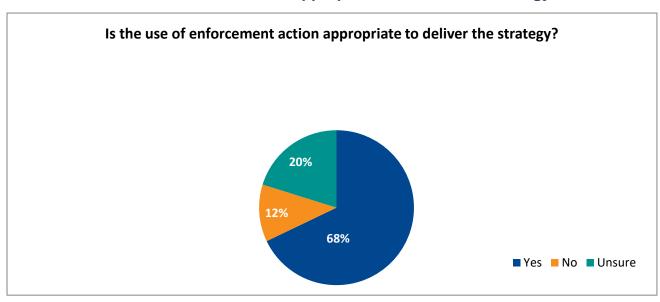
The Consultation Team have taken on board feedback and comments made in relation to the consultation questions

The Strategy outlines the need to involved internal partners as well as the home owners and partner agencies

The Strategy outlines the economic and social costs relating to empty properties. The Council has an obligation to ensure that Empty Properties are dealt with appropriately

Owners do have a responsibility to maintain their properties and the Strategy sets out the actions the Council will take to enforce this obligation. The Strategy also outlines the key steps taken to communicate and engage with property owners

7.12 Is the use of enforcement action appropriate to deliver the strategy?



The graph shows that 68% (74) of respondents said they agreed that the use of enforcement action was appropriate to deliver the strategy. 12% (13) disagreed and, 20% (22) were unsure.



Where respondents stated no, they were able to give reasons for their answer. 27 responses were received and the responses are themed below:

Theme	Number of responses
THOMO	1000011000
All circumstances are different and this should be considered	14
Property is privately owned so the council should not have the right to get involved	6
Empty property owners need more help financially	2
The council should be more forceful in the sale of empty properties	1
"Cost of legal action to the Council"	1
The strategy is not clear how families of deceased owners are supported	1
Owners should maintain their properties at no cost to the council	1
Unsure of enforcement actions and outcomes	1

Response:

Comments noted.

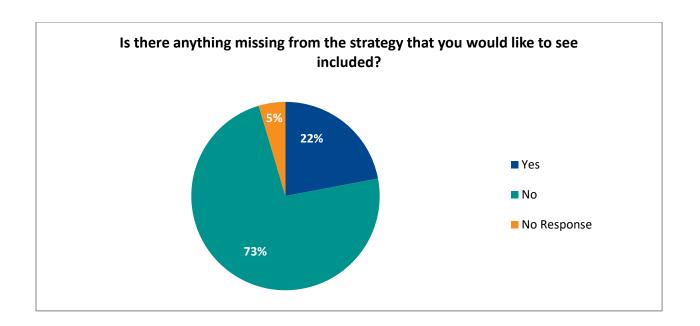
The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

The Strategy already addresses the comments outlined above in relation to enforcement, support available for property owners and how each circumstance is recognised by dealing with cases on a case by case basis

The Strategy outlines the economic and social costs relating to empty properties. The Council has an obligation to ensure that Empty Properties are dealt with appropriately

7.13 Is there anything missing from the strategy that you would like to see included?





22% (24) of respondents told us that they felt that there was something missing from the strategy that they would like to see included. 73% (80) did not feel that there was anything missing and 5% (5) did not respond to this question.

Where respondents stated yes, they were able to give details of what they thought should be included. 22 responses were received and the responses are themed below:

	Number of
Theme	responses
There needs to be more awareness of support available	9
Commercial empty properties should be included in this strategy	3
Introduce timeframes for work to be completed around the process	3
Owners to take full responsibility of costs, with no costs to the council	2
All circumstances are different and this should be considered	2
The public need more information on how to report empty homes	1
Query around what council will do with properties following compulsory	
purchase	1
There is a need for better communication between owners and authority	1

Response:

Comments noted.



The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

More awareness of the support available – this has already been addressed in the Information Pack and information available on-line on the Council's website

Commercial Empty Properties to be includes – specific reference to our approach is made on page 12 of the Strategy which confirms that opportunities will be considered on a case by case basis

Introduce timeframes for work to be completed – this is dealt with on a case by case basis due to the different circumstances related to each property

Other generic responses on information and communication are addressed throughout the Strategy document

7.14 Please use this space to provide any further comments on this strategy.

Respondents were given the opportunity to give any further comments on the strategy.

27 comments were provided which are themed below:

Thoma	Number of
Theme	responses
All circumstances are different and this should be considered	8
The Scheme is a great idea	7
Commercial empty properties to be included in this policy	3
Need more information in order to make an informed decision	3
This policy would mean additional cost to the council	2
Strategy needs to be implemented urgently	2
The council should increase council tax for empty properties	1
Introduce timescales for application process	1

Response:

Comments noted.

The Strategy recognises the many variables in dealing with this issue and contains information on what support can be made available for home owners to bring their property back into use.

More awareness of the support available – this has already been addressed in the Information Pack and information available on-line on the Council's website



Commercial Empty Properties to be includes – specific reference to our approach is made on page 12 of the Strategy which confirms that opportunities will be considered on a case by case basis

Each case is dealt with on a case by case basis due to the different circumstances related to each property

Council tax changes have already been introduced

Introduce timeframes for work to be completed – this is dealt with on a case by case basis due to the different circumstances related to each property

The Strategy outlines the economic and social costs relating to empty properties. The Council has an obligation to ensure that Empty Properties are dealt with appropriately

Other generic responses on information and communication are addressed throughout the Strategy document

8. EMAILS, SOCIAL MEDIA TELEPHONE AND LETTER COMMENTS

Additional comments were invited by letter, phone call or email as well as via our corporate social media channels during the consultation period.

8.1 Email and letter comments

One letter was received during the live period from the Registered Landlords Association. The letter is included in Appendix one. The letter contained multiple themes as detailed in the table below:

Theme
There is a need for robust strategy
Empty properties can have a negative impact upon surrounding properties
There is a potential increase in crime, vandalism and antisocial behaviour where there are empty properties
There should be more engagement with private rented sector landlords
Welcome the proposed financial incentives in this policy
Provides opportunities for non-residential properties
Clarification on enforcement and sanctions is needed

Response:

Comments noted

8.2 Social media and telephone comments



We received 12 comments over social media and one comment was received via telephone during the live period, all comments have been themed and are detailed in the table below:

Theme	Number of responses
Make use of unused properties instead of building new houses	4
Lots of empty properties in the valleys	3
The look of a property shouldn't be the main priority	2
Charge owners for letting properties get into a state of disrepair	1
Damage to neighbour's properties should be taken into consideration	1
Invest in town centre is positive	1
Funding should be provided for people to move into the empty properties themselves	1

Response:

Comments noted. The Strategy is focused on making best use of empty properties and takes into account the comments made above

9. CONCLUSION

A sample of 109 survey completions is subject to a maximum standard error of +1.96% at the 95% confidence level. Therefore, we can be 95% confident that responses are representative of those that would be given by the total adult population, to within ±9.38% of the percentages reported.

This means that if the total adult population of Bridgend had taken part in the survey and a statistic of 50% was observed, we can be 95% confident that the actual figure lies between 40.62% and 59.38%.

9.1 Equality Impact Assessment

The EIA screening informed the development of the consultation questionnaire. The EIA screening identified that there was no impact on any protected characteristic groups therefore a full EIA is not necessary for this strategy.

9.2 Empty Property Strategy consultation

Overall the Empty Property Strategy was supported by the survey respondents as follows:

- 98% of respondents stated that the strategy was written in plain language and was easy to understand
- 97% of respondents felt that the strategy clearly explained why empty properties were a priority for the council



- 95% of respondents said that the aims and objectives outlined within the strategy were the most relevant
- 91% of respondents agreed with the council approach to identify and prioritise empty properties
- 84% of respondents agreed with the councils approach for providing help and assistance to owners of empty properties
- 90% of respondents agreed that the planned approach to ensure effective communication with owners and the public is appropriate



10. APPENDIX ONE

Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr Bridgend County Borough Council



Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont, CF31 4WB / Civic Offices, Angel Street, Bridgend, CF31 4WB

Adfywio Tai a Chymuned/
Housing & Community Regeneration
Deialu uniongyrchol / Direct line: (01656) 643664
Gofynnwch am / Ask for:

Ein cyf / Our ref: Empty Property Strategy 2019-2023 Consultation Eich cyf / Your ref:

Dyddiad / Date: 15/02/2019

Dear Sir / Madam

Empty Property Strategy Consultation:

We are writing to you as we believe you may have an interest in the below consultation exercise that is being undertaken by Bridgend County Borough Council.

The Council is committed to working with owners of empty properties so that they can be brought back into use and re-occupied.

An Empty Property Strategy has therefore been developed to:



- Outline an approach to identify, prioritise and reduce empty private sector residential
 properties across the County Borough and help contribute towards increasing the
 availability of housing for sale or for rent.
- Adopt an approach that seeks to work cooperatively with owners to bring their empty properties back into use.
- Consider the use of legislative powers where properties continue to remain empty and are
 in a state of disrepair, are detrimental or a nuisance to the community.

Ffön/Tel: 01656 643643

Negeseuon SMS/ SMS Messaging: 07581 157014

Twitter@bridgendCBC

Cyfnewid testun: Rhowch 18001 o flaen unrhyw un o'n rhifau ffon ar gyfer y gwasanaeth trosglwyddo testun

Text relay: Put 18001 before any of our phone numbers for the text relay service

Rydym yn croesawu gohebiaeth yn Gymraeg. Rhowch wybod i ni os mai Cymraeg yw eich dewis iaith

We welcome correspondence in Welsh. Please let us know if your language choice is Welsh

We would like to hear your views on the strategy. The consultation will be live between 01/02/19 and 28/04/19 and the consultation documents with the full strategy can be accessed online at:

www.bridgend.gov.uk/my-council/equalities-and-engagement/consultations/current-consultations/proposal-to-consult-on-the-empty-property-strategy-2019-to-2023/

Alternatively, you can view the consultation documents by attending the Civic Offices, Angel Street, Bridgend, CF31 4WB, or by telephoning 01656 643664 to request them in the post.

If you have any queries regarding the consultation, please contact 01656 643664.

Please accept our apologies if you have received this letter in error. This letter has been sent to you as part of a widespread mailshot to all owners of empty properties throughout the Borough.

Yours faithfully

Housing Strategy Team





11. APPENDIX TWO



6th of March 2019

Bridgend County Borough Council | Consultation and Engagement Team Civic Offices Angel Street Bridgend CF31 4WB

Dear Sir/Madam,

Bridgend County Borough Council Empty Property Strategy 2019-2023

Thank you for the opportunity to respond to Bridgend County Borough Council's Empty Property Strategy 2019-2023. We broadly support the proposal and we would be delighted to collaborate with Bridgend County Borough Council in promoting the scheme.

The Residential Landlords Association (RLA) represents over 50,000 private sector residential landlords in England and Wales. The RLA provides support and advice to members and seek to raise standards in the Private Rented Sector through our code of conduct, training, accreditation and the provision of guidance and updates on legislation affecting the sector.

Why we have responded to this consultation.

According to the Welsh Government, the latest figures suggest there are in addition of 23,000 empty properties in Wales. Some of these properties could provide homes to people who need them such as vulnerable people and people on housing waiting lists to prevent homelessness. According to your strategy, as of June 2018, 1,225 private sector residential properties within Bridgend County had been left empty for six months or more, which is strong evidence that a clear and robust strategy is required to bring these properties back into use.

The RLA fully recognises the priority for Welsh local authorities in bringing empty properties back into use as houses rather than leaving them empty. Not only is providing more housing important, but where homes are left empty for significant periods of time, the impact can cause deterioration for the surrounding community. Accordingly, empty homes not only reduce the value of the house in question but have an impact on surrounding properties. Empty properties can also become targets for vandalism, crime and anti-social behaviour such as fly-tipping.





Council Tax reduction for empty properties

While not a matter specifically related to this consultation, we note that the council are considering ending the Council Tax discount for empty properties. We hope that in doing so the authority would consider exempting landlords who can prove that their property is being renovated for structural improvements or to ensure that it is fit for human capacity. There is precedent for this form of action with many local authorities in England and Wales taking this form of exception.

The Council's approach

The RLA welcomes the general approach adopted by Bridgend County Borough Council in pledging to work cooperatively with landlords who have empty properties and by ensuring regular and effective communication with landlords is maintained. Where positive dialog can be maintained, the RLA would be delighted to support Bridgend Council in communicating with local landlords.

When properties become vacant for long periods of time, there is often a sound reason why the property is empty. Vacant properties are generally undesirable for landlords who are effectively operating in a business model. Some of the main reasons why a private rental property might be vacant could be that the property requires structural improvements, or the property requires work to ensure it is fit for human capacity. Where this is the case, we welcome the opportunity for landlords to apply for empty property interest free loans and empty property grants. We particularly welcome the opportunity for landlords to receive grants to bring empty properties back into homes for rental at local housing allowance rates into use. However, we require clarification on how much funding is available and if such a grant could be used to achieve the UK Government's Minimum Energy Efficiency Standards? We would like to point out that current UK Government legislation stipulates that any new or a renewal tenancy may only lawfully be granted for a property that has an EPC rating of A to E and that by 2030 the minimum EPC will be a C. This is a major obstacle for many Welsh landlords given the age of housing stock and with many properties having single walls. If any efforts were made by the authority to improve EPC ratings, it would be our recommendation that achieving above E ratings will be most beneficial.



For the case of landlords operating within the private rented sector, it makes sound business sense for landlords to have their properties occupied with tenants rather than left empty. In this context, it should be acknowledged that PRS landlords are operating in a difficult climate in providing an important part of the solution in tackling the housing crisis with significant and growing evidence illustrating the importance of the PRS in housing local people – including the most vulnerable and needy in society. For this reason, and to maintain high standards within the local community, the RLA applaud the overall aims and objectives of the strategy providing the local authority continues to engage with PRS landlords and offers support for those that require additional help in ensuring their properties are occupied.

RESIDENTIAL LANDLORDS ASSOC.

1 Roebuck Lane, Manchester, M33 7SY T+44 (0) 3330 142 998 E info@rla.org.uk
Residential Landlords Assoc. is a trading name of Residential Landlords Association Ltd. Company No. 2869179.

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While we welcome the proposed financial incentives, in our experience, the issuing of loans being granted on the basis of enabling charges on a property is not always effective. This we believe would be also be the case for the Houses into Homes Loan as it will not take the combined loan and current mortgage above 80% of the property value. Given the low value of stock in some areas of Bridgend County, particularly in parts of the Ogmore and Llynfi Valley, it might be the case that some of the houses completed are not worth more than £50,000, which doesn't take into consideration conditions and the extent to the cost in getting stock up to standard.

We also welcome the Council drawing attention to possible VAT discounts for energy saving materials and building and construction for landlords that bring empty properties back into use that have not been lived in for two or more years through VAT Notice 708 and VAT Notice 708/6. We applaud the cooperative approach of the council in supplying landlords with the necessary official documentation which can be forwarded to the Inland Revenue as evidence of eligibility for these notices.

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Another reason why properties might remain unoccupied could be that the property has poor access. For example, access to the dwelling could be from a commercial premise including a shop. Alternatively, the dwelling could be in an area that is not highly sought after or an area of low rental demand. We believe that any financial support should be used to add additionality to properties that are hard to rent. This could include improving access or adding additional benefits and improvements to the property to make them more appealing to the market. However, we would also welcome additional support from the local authority, to enhance its relationship with the PRS in providing support for marketing hard to rent properties. For PRS properties that have been vacant for long periods of time that are suitable for the rental market in terms of condition and legalities, we would welcome additional support from the council in finding suitable tenants from their housing waiting lists.



We also welcome opportunities for non-residential properties, such as commercial properties, churches and chapels and those properties that the Inland Revenue's Valuation Office Agency has deleted from the Valuation List, to be brought back into residential properties. We would, however, like clarification on how the authority will engage with PRS landlords in how they can purchase such properties when they are suitable for the rental market?

Former commercial properties would inevitably require substantial improvements in order to be suitable for residential purposes. We believe the conversion work is a good opportunity for small builders and traders to get access to work. We would welcome clarification on how small traders could gain access to this work and whether the local authority will prioritise local small traders to carry out this work? Likewise, we note that the authority recognises that some larger empty properties could be converted into smaller units or converted into specialist housing, which could house vulnerable groups such as the low waged or those dependent on welfare. We believe that this type of conversion work would also be most desirable for small traders and builders and would welcome clarification on how such traders will be engaged in the process?

We believe that the scoring criteria used to prioritise which empty homes to tackle is relatively sound in that a series of areas are considered including if the property is a nuisance, if there have been complaints from elected members or if the property is detrimental to the local community etc. We also welcome additional scoring for areas of high need in housing.

While there is a lot to commend the strategy in terms of support outlined, we appreciate that on a small number of occasions, enforcement activity and sanctions will be necessary including enforced sales as well as more serious sanctions such as Empty Dwelling Management Orders (EDMO) and Compulsory Purchase Orders (CPO.) For CPOs and EDMOs, we would hope these would be used as a very last resort and welcome clarification on the process before getting to this stage and how the authority would consider communicating with landlords. We would hope that given many landlords have multiple houses and use the services of agents, that a data sharing agreement with Rent Smart Wales would be sought after in order to make sure the correct correspondent is contacted?

We once again thank you for the opportunity to engage with the local authority on this subject and would welcome any future dialog on this or any other matters relating to the PRS.

Kind Regards,

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