

**SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE
DATA PROTECTION FORM**

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Date:	17/05/2019
Organisation: (if required)	BEFS (Built Environment Forum Scotland)
Topic of submission:	Call for Evidence on Empty Homes in Scotland

- I have read and understood the privacy notice about submitting evidence to a Committee.**
- I am happy for my name, or that of my organisation, to be on the submission, for it to be published on the Scottish Parliament website, mentioned in any Committee report and form part of the public record.**
- I would like to be added to the contact list to receive updates from the Committee on this and other pieces of work. I understand I can unsubscribe at any time.**

Non-standard submissions

Occasionally, the Committee may agree to accept submissions in a non-standard format. Tick the box below if you would like someone from the clerking team to get in touch with you about submitting anonymously or confidentially (not for publication). It is for the Committee to take the final decision on whether you can submit in this way.

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LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

CALL FOR VIEW ON EMPTY HOMES IN SCOTLAND

SUBMISSION FROM

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment.

The reasons which lead to any home being empty are complex and manifold. These reasons can include, but are not limited to:

- A current economic system which benefits and prioritises new-build, rather than reuse, the lack of VAT parity for new-build and renovation being part of this (albeit VAT reduction can be available for empty properties in some circumstances).
- Lack of ability (either legislatively or capacity) to possess abandoned/empty homes by Local Authorities. Scottish councils have backed government plans for compulsory sales orders (CSOs – which are seen as more straightforward than compulsory purchase orders) for empty homes. Holyrood has pledged to bring in the powers by 2021, which would enable councils to force a home which has been vacant for an undue period of time to be sold at public auction. Rural Housing Scotland also backs CSOs, as does housing and homelessness charity Shelter Scotland and the Scottish Empty Homes Partnership.
- Lack of funding to bring empty homes back onto the market – particularly if in an area where housing is needed, but not seen as an 'investment'. High administrative costs to bringing back individual properties, rather than working on a larger-scale 'developments' can be seen as preventative. (Despite the cost-per-property to reinstate an empty home being between £6k-£25k; whilst the average cost of a new-build is £100k+.)
- Where an empty home is a traditionally-built property they can be viewed as potentially:
 - o having poor potential under EPC ratings (due to a system which does not, yet, correctly assess traditionally built homes)
 - o difficult/expensive to retrofit with energy saving measures.

These perceptions demonstrate a lack of appropriate knowledge and understanding around traditional buildings; but there is also often a skills-gap in trained workers to carry out appropriate repair and adaptation. This can severely delay (and potentially increase cost due to market pressures) any works to bring a property back into use.

- At times, empty buildings may be listed buildings, this listing can be perceived as a barrier to change, which may not be the case. There is clear guidance available on Managing Change from Historic Environment Scotland.

There can be a sense of blight for a community, where homes are left to deteriorate. Unfilled homes can have knock-on effects, with reduced amenities and reduced localised investment. Rural and urban areas impacted. Areas where investment is low will be unfairly disadvantaged as the draw to reinstate an empty home may be lower than more affluent areas (or where there is a more buoyant property market).

The Scottish Government have a strong community empowerment agenda which has brought in a variety of new rights and responsibilities. Areas that could become pertinent to empty homes are Community Right to Buy and Part 3A of Land Reform Act Abandoned, Neglected or Detrimental land. Whilst funds have been made available to enable communities to buy land, it could be questioned whether the resources and skills necessary to run, maintain and sustain some of these endeavours has been as equally supported. Only time will tell if this has been an effective use of resources for the long term. Communities need to be genuinely empowered, not burdened by default. Currently the legislation does not cover empty homes, perhaps this is an area for further research and exploration?

Empty Homes Network does excellent work across Scotland, and numbers of homes re-occupied continue to climb, but there is only so much capacity/finance available. Without additional policy incentives to realise the potential to both people and place this situation seems unlikely to change.

Preventative work to stop homes falling empty, and to enable repair could help to reduce the numbers of empty homes.

With the recent Scottish Government statement on the [declared climate emergency](#) the role that empty homes can play in mitigation is clear. Net-zero will only be possible through reuse of our existing resources, as well as technological advances. Empty homes can be an adaptable resource, and a source of embodied energy, capable of mitigating against negative impact on our climate. These benefits can only be fully realised should the appropriate skills, resources, and policies, be in place. They may exist in places where there is already transport and social infrastructure, providing much less carbon impact than other, less well connected, options.

Policy changes enabling further re-use of these resources support not only the NPF but also the UN Sustainable Development Goals (particularly UN-SDG 11 – Sustainable Cities and Communities).

At times there is a period of decline before a property is declared long-term empty. Further preventative measures may be appropriate, and cost-effective. Current statistics show the levels of disrepair across all tenures and property types as:

- 50% of all of Scotland's homes have disrepair to critical elements (SHCS [Scottish House Condition Survey]2017)

- 68% of traditionally built homes (pre-1919) have disrepair to critical elements (SHCS 2017)
- Traditionally dwellings constructed before 1919, make up approximately 20% of Scotland's building stock (STBF 2016)
- In 2017, 40% of all dwellings failed to meet Scottish Housing Quality Standards (SHQS) (SHCS 2017)
- 30% of homes in Scotland failed the SHQS due to Energy Efficiency, while 10% failed due to not being Healthy, Safe and Secure properties (SHCS 2017)

Ways to address this include (but are not limited to) improving the ease and ability of repairing and maintaining our tenemental properties. There are well over half a million tenement properties in Scotland. They make up 24% of its domestic housing property.

Proposals for improvement in this area will be put before the Scottish parliament in 2019 by the Scottish Parliamentary Tenement Maintenance Working Group.

Open data, and access to data, is key to enabling further developments in this area. Registers of Scotland will have a role to play in this.

Recent announcements by the UK Government in relation to a high-street ownership register – to make it easier to regenerate high-streets could, in the longer-term, be applied to empty homes too.

BEFS would be happy to discuss any aspects to this response further.