

Nobody's home

How wealth investment locks
Londoners out of housing

September 2021



This project was supported by Trust for London.
For more on housing and poverty in London,
see London's Poverty Profile:
www.trustforlondon.org.uk/data

Action on Empty Homes campaigns for more empty homes to be brought into use for people in housing need. Our aims are to:

- Raise awareness of the waste of long-term empty homes.
- Campaign for changes to national policy.
- Support local communities in transforming their neighbourhoods.
- Provide advice for those seeking to bring empty homes back into use.
- Research and develop ideas for bringing long-term empty homes back into use for those in housing need.



Action on Empty Homes

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Contributors

The following people and organisations were interviewed or consulted during the production of this report:

Borough wide meetings:

- Action on Empty Homes (AEH) held meetings in five London boroughs: Brent, Camden, Hackney, Haringey, and Southwark. These were attended by local housing activists and borough NGOs concerned about housing issues. Local councillors also attended some borough events.

London Empty Homes Officers:

- Officers from the following boroughs took part in our online meetings and discussion: Barking & Dagenham, Barnet, Camden, Croydon, Ealing, Enfield, Hackney, Hounslow, Kensington & Chelsea, Kingston upon Thames, Lambeth, Lewisham, Merton, Wandsworth, Waltham Forest; as well as the Secretary of the national Empty Homes Officers Network.

There was additional input outside the meeting from council officers in Bromley, Southwark and Tower Hamlets, meaning 18 boroughs were involved in total.

Cabinet Members with Housing Responsibility in London boroughs:

- Camden - Cllr Meric Apak.
- Islington – Cllr Diarmid Ward.
- Kensington and Chelsea – Cllr Kim Taylor-Smith (also Deputy Leader).
- Kingston upon Thames – Cllr Emily Davey.
- Merton – Cllr Martin Whelton.
- Southwark – Cllr Leo Pollak and his successor Cllr Helen Dennis.

AEH also received written responses to queries from Tower Hamlets – where the cabinet member Cllr Sirajul Islam was ill with covid and then recuperating.

Data leads and Council Tax collection departments:

- Our initial research received responses from nine boroughs: Barnet, Camden, Enfield, Haringey, Hounslow, Kensington & Chelsea, Lewisham, Southwark, Tower Hamlets.

We conducted more detailed discussions with: Enfield, Haringey, Kensington & Chelsea, Southwark; and Tower Hamlets. Further boroughs and officers also contributed to our research on an anonymised basis.

London boroughs:

- AEH drew publicly available data from all 32 London boroughs and the City of London and communicated with relevant cabinet members or Committee chairs in every borough.

Greater London Assembly Housing Committee Members:

- Sian Berry (Green Party); current Committee Chair.
- Andrew Boff (Conservative).
- Murad Qureshi (Labour); Committee Chair at time of interview.

AEH also spoke with Southwark Liberal Democrat Councillor Adele Morris, who is not on the Committee but was interviewed to gain input on housing policy on behalf of Liberal Democrat councillors.

Mayor of London and Greater London Assembly:

- AEH is part of the Mayor of London's London Housing Panel, an initiative supported by Trust for London. The Panel works with the Deputy Mayor for Housing and relevant officers in areas including research on empty and under-used homes in London.

Ministry of Housing Communities and Local Government:

- Sandra Tudor, Head of Profession for Statistics.

Office for National Statistics:

- National and local housing data and verification.

Office for Statistics Regulation:

- Oliver Fox-Tatum, Statistics Regulator for Housing, Planning and Local Services

Introduction

Following the publication of our *Pretty Vacant*¹ report in 2020, Action on Empty Homes (AEH) received support from Trust for London to pursue the report's findings about growing levels of vacancy and under-use in London housing at a time of intense housing crisis.

London councils place two thirds of the national total of homeless households into temporary accommodation.² With up to 40% of new homeless applicants in 2019/20 placed in out of borough accommodation this has knock-on impacts on many areas both within and outside Greater London. At the end of 2020 over 55,000 Londoners were in temporary accommodation outside their home boroughs.³

In *Pretty Vacant*, AEH investigated the increasing role of empty and underused homes in locking Londoners out of access to decent and genuinely affordable housing. *Pretty Vacant* showed how the financialization of housing in London is driving up prices and driving down accessible supply.

In our next phase of work, Action on Empty Homes has been examining how it is that we keep building housing that doesn't house anyone and what can be done to stop it. We also look at the broader issue of growing numbers of empty and under-used homes in London and offer recommendations on policies to bring them back into use.

We set out to test *Pretty Vacant*'s conclusions through meetings and discussions with those at the heart of the housing crisis in the capital:

- Housing advocates and campaigners in a series of borough-based meetings
- Policy makers at GLA and borough levels

- Organisations who manage housing data both nationally and in London.

During these discussions, in particular those with local communities and borough-based NGOs, some clear themes emerged. In this report we draw together their insights to advocate for change.

What is going wrong with London's housing?

■ A failure to meet local needs

Communities recognise what is going wrong in their neighbourhoods: the common factors are failure to meet local needs and priority given to residential property investment which excludes most Londoners and brings housing poverty in its wake.

■ London is becoming hollowed out by emptiness

Increasingly areas of London are becoming hollowed out by emptiness, unable to support a balance of services as residence drops. Even schools are now closing in some places as rolls fall in response to areas becoming too expensive for families on average incomes.⁴

■ London's homes must be more than an easy route to investor returns

London housing must be more than an easy route to high investment returns and a safe place to wash dirty money.⁵ Investors exploit London's housing crisis at the expense of those on low and average incomes, who are increasingly forced into poverty by housing costs, or driven out of gentrified neighbourhoods altogether.

... London's homes must be more than an easy route to high investment returns and a safe place to wash dirty money

...



... some clear themes emerged. In this report we draw together their insights to advocate for change ...

■ **Successful recovery from the pandemic is about building a future that includes all Londoners**

As London recovers from the pandemic it will be increasingly important that housing costs are not an obstacle to a successful recovery for all Londoners.⁶ Yet while tens of thousands were living in temporary and over-crowded accommodation at the height of the pandemic,⁷ at least 125,000 properties stood empty across London,⁸ further highlighting the need to address the question of why the capital has both high levels of vacancy and huge numbers of people in acute housing need.

Sustainability also must be at the heart of London's post-pandemic recovery. Currently, 20% of all greenhouse gas emissions in the UK are from residential housing. At the same time, around 12% of Londoners live in fuel poverty, facing soaring fuel costs in homes that are hard to heat. The answer to this is retrofitting homes to slash emissions: empty homes can lead this retrofitting revolution. The socially and environmentally harmful practice of demolishing structurally sound estates should also end.

What can we do about it?

■ **Advocating for change – a new campaign coalition**

As a direct outcome of the work carried out to produce this report, from March 2021 we began working with a coalition of organisations to create a wider

campaign to tackle the empty homes problem. This will be launched in September 2021 as the Campaign Against Empty Homes.

The first initiative of this campaign is a National Day of Action on 9 October under the banner 'We are in a housing, climate and health emergency - take action on empty homes', drawing attention to the role that retrofitting while renovating empty homes can play in helping to tackle the climate emergency.

■ **We need to campaign for change: London's 2022 borough elections**

London's failed development model needs to be challenged. It is reproducing emptiness and unaffordability year on year. As Albert Einstein is widely credited with saying, 'The definition of insanity is doing the same thing over and over again but expecting different results.' It is high time that we in London heeded his warning and stopped repeating the same mistakes in housing.

As we look forward to borough elections in 2022, AEH and the wider Campaign Against Empty Homes will be calling on candidates, Councillors and MPs to back our campaign to ensure housing is used and built to meet local needs first.

■ **The campaign demands will draw on the detailed recommendations contained at the end of this report. In summary, these are:**

- *The adoption of more robust strategies on the part of London boroughs to challenge emptiness of all types*
- *The introduction of a RetroFirst approach and the reintroduction of empty homes to the residential stock, as crucial initiatives in addressing the climate emergency*
- *Tighter regulation of Airbnb and full data sharing with borough enforcement teams*
- *A Vacancy tax based on the Vancouver model*
- *The reform or abolition of the second homes category*
- *A transparent national register of residential property ownership and usage*
- *A new Government-funded Empty Homes Programme of support for enforcement, incentives and investment at a local level*



The paradox of London's housing crisis: What GLA Housing Committee Members told us

The role of the Greater London Assembly Housing Committee

The Committee⁹ scrutinises Mayoral housing policy and delivery on behalf of the Greater London Assembly and by extension on behalf of Londoners. We interviewed the Chair in 2021 Murad Qureshi (Labour), Deputy Chair Andrew Boff (Conservative) and Sian Berry (Green) who now chairs the Committee.

We also spoke with Liberal Democrat Councillor in Southwark, Estelle Morris, as well as Lib Dem Councillor and Housing Portfolio Holder on Kingston Council, Emily Davey, due to the unavailability of a Liberal Democrat Committee member.

How Committee Members see London's Housing Crisis:

The paradox of London's housing crisis is that every politician agrees that it exists, and that policy failure is contributing to it; there is even a remarkable level of agreement on some of the solutions. In order to chart a path through this, our summary of interviews with Committee members will draw attention to both differences of opinion and areas of agreement. It should not, however, be seen as an attempt to comprehensively describe each of the politician's positions.

Sian Berry MLA (Green Party)

Sian Berry has been critical of mayoral funding for estate renewal programmes across London, drawing attention to net losses of social housing in many boroughs.¹⁰ In January 2021 she issued a briefing which showed that over 6,700 social

homes have been lost in completed schemes involving demolition of council or social housing given planning permission since 2003.

Regarding her experience of interrogating the ruling Labour Party's plans in Camden for development through the Community Investment Programme or CIP,¹¹ Berry describes how she believes that safeguards have been put in place to limit some of the most obvious problems apparent in some existing residential developments from emerging in those that are part of the CIP. Notable amongst these is a restriction on the use of properties as short lets.

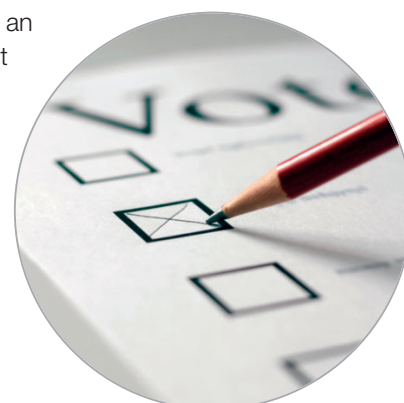
At the time she spoke with AEH for this project Berry was in the midst of the London Mayoral Election campaign and her main new housing proposal was concerned with key worker housing.¹² Berry's plan showed how the Mayoral budget could be amended to allow the mayor to purchase unsold newbuild or empty rental homes at an average price of around £440,000 to use as key worker homes and produce an income stream to pay back the investment and allow further borrowing at a pan-London level. The Plan, which the Green Party argue was fully costed, proposed using unallocated money within Mayoral housing budgets as a crisis response to address key worker housing needs.

Her Manifesto also proposed rent controls, which would require Central Government



Sian Berry

... her manifesto included a proposal to support tenant-led development ...



... the paradox of London's housing crisis is that every politician agrees that it exists, and that policy failure is contributing to it ...

legislation to be enacted effectively. Berry also advocates controls on Airbnb, including via lease constraints within newbuild developments, which would not require legislation but might be challenged by some private sector developers through planning appeals.

She believes more radical housing solutions are needed: her manifesto included a proposal to support tenant-led development. Although her emphasis is not development-led it is not anti-development and her manifesto¹³ argued the need to:

'do more to involve residents in devising plans from the start and give firmer guidance on neutrality in [estate regeneration] ballot publicity', and stated, 'We will support the production of credible People's Plans for residents on estates with a funded expert team in City Hall to help.'

Andrew Boff MLA (Conservative)

Andrew Boff describes himself as 'a big fan of council housing'; indeed, he was born in one. However, he is also keen on market-led solutions and prefers planning policy and regulation to bans as a solution to issues like the Airbnb explosion. He describes himself as believing in 'low taxes, not no taxes'.

When presented with questions about whether current London development is building the right housing to meet Londoners' needs, Boff says, 'This is where my fundamental difference from other parties is: the debate obsesses about tenure and I don't.' Boff claims that tenure obsession, as he terms it, reduces the quality of homes built. This might sound like blaming the poor for the poor doors, but Boff says that London housing needs to address 'all people' not just those defined as in most housing

need. He highlights what he calls 'the middle band who don't get subsidy' as a big issue.

He also argues, 'if you build more the price comes down' and says that the (Labour) Mayor is underperforming by not building enough. He is also concerned by the relationship of current building models to the Building Safety Crisis. He describes some new development in Barking, where he lives, as building 'prisons for people during the next pandemic', made worse by high service charges and huge re-cladding bills.

Boff is no fan of 'investor towers' or 'modern construction methods', which he says have failed Londoners and created an explosion of buy to let and short lets, citing Southwark as what he calls a 'follow the money' example. However, he views planning controls as the way to combat these in future.

Boff stated that he was not averse to conditions being imposed on new developments at this stage, including the primary residence conditions which Labour councillors in Islington have attempted to impose on some developments, albeit with relatively little evidence of successful enforcement or verification. However, he feels buyers should have freedom to use 'their assets' as they see fit; he sees no problem with flats being rented out but is willing to accept a restriction on use as short lets, because of the impact on housing supply. He also wants to see more council homes built and supports Right To Buy continuing but with councils allowed to spend the proceeds of sales on building more homes.

Murad Qureshi, Chair GLA Housing Committee

When asked about the biggest housing challenge facing London, Murad said that in terms of immediacy he saw the Building Safety Crisis as paramount, because it resulted in so many potentially unsafe homes, and because of the knock-on impacts from that. However, he added that if you asked Housing Association tenants, they might cite regulatory issues over the performance of social landlords.



Andrew Boff

Murad went on to say that overall, the lack of a healthy stock of social housing was London's greatest long-term challenge. He recounted speculation about an 8% drop in London population post-Brexit and post-pandemic in recent *Financial Times* articles anticipating census results, but noted that despite this, numbers of homeless families and families placed in temporary accommodation by London boroughs continued to rise. Furthermore, while the stock of empty homes and unused Airbnbs might be significant and rising, this stock was not becoming available to the groups in most housing need.

With regard to this, he drew attention to the trend toward new housing supply being dominated by high service charged so-called (or actual) luxury developments. This in effect ensured the long-term pricing out of ordinary Londoners from such developments. For this reason, he has supported calls for Vacancy Taxes, to shift the economic balance that allows investors to profit from owning flats in such developments without ever making them available for rental as primary residences (or living there themselves). He also drew attention to the relatively low rate of property taxation in London both by national and international standards a subject on which he had recently had a letter published in the *Financial Times*.¹⁴

Qureshi also called for reform of both compulsory purchase and Empty Dwelling Management Order Powers to allow councils to take stronger action against recalcitrant or unresponsive empty property owners. In particular, he highlighted the fact that he felt the two-year wait before councils could levy Empty Homes Council Tax Premiums was far too long and that a one-year term would be a more reasonable period.

Adele Morris

Although Adele Morris is not on the GLA Housing Committee we spoke to her as a prominent and experienced Lib Dem spokesperson and a Southwark councillor; no

Lib Dem GLA Housing Committee member was available for interview. Adele highlighted the need for more social housing and drew attention to the deficit in what could be called genuinely affordable intermediate housing. In other words, a housing solution for those in jobs vital to the London economy, with longstanding family connections to London boroughs where they had grown up and worked but who were now forced out by the lack of affordable housing options.

The only options available for people, especially those who have no hope of ever reaching the top of a local authority housing waiting list, for example single people, were very poor housing conditions, poverty, relocation out of London, or combinations of the three, together with lengthy bus commutes to inner London jobs. With average deposits requiring tens of thousands of pounds in savings, buying was never going to be an option for the majority of these Londoners, Adele said.

Key worker housing was also an issue she said had fallen off the agenda but that she felt was beginning to gain traction again, and she cited some positive if limited moves in recent Southwark developments. If this was not addressed at greater scale London public services were likely to face ever-greater recruitment difficulties for many roles.

She also drew attention to the way current public data hides emptiness through categories such as second homes which have no residential use, and buildings where many or all flats are used for short-term rental only. Adele cited the One Blackfriars development¹⁵ and the number of homes that have never been occupied as an example of building the wrong homes to meet need. She also supported moves to build requirements for primary residence clauses into leases as a way forward.



Murad Qureshi

... The only options available were very poor housing conditions, poverty, relocation out of London, or combinations of the three, together with lengthy bus commutes ...

Adele Morris



The temporary accommodation crisis: What London borough Cabinet Members told us

The most striking thing about interviewing cabinet members from London boroughs for this project was the common theme that they are facing a temporary accommodation crisis, in the wider context of an acute shortage of social housing.

This is the sharp end of London's housing crisis and it is also the reason that London's crisis is not contained within its own boundaries but also increases pressure on the wider South Eastern and Eastern counties surrounding it.

Boroughs with which we conducted interviews pursued a range of different strategies with regard to supply, ranging from building council homes on existing local authority-owned sites, through to purchasing homes from developers (including the notable purchase of homes from Notting Hill Genesis to be re-purposed as council housing for social rent by Southwark¹⁶). Kensington & Chelsea has also looked at the option of developing key worker housing in other boroughs, while several councils have created housing development arms to build new housing across a range of tenures.

Cllr Taylor-Smith from Kensington & Chelsea was one of several cabinet members to highlight how weak council powers were to bring empty homes into use. Indeed, the Council wrote to Kit Malthouse, then Housing Minister, in October 2018 calling for Empty Dwelling Management Order (EDMO) powers to be strengthened,¹⁷ primarily through a removal of restrictive ministerial guidance introduced under the Coalition (Cameron-Clegg) Government, a call they reiterated during Empty Homes Week 2021.

Cllr Emily Davey (Lib Dem) of Kingston also drew attention to the weakness of these powers

in our discussion with her, and while Cllr Alison Butler of Croydon praised the Croydon officers' work on bringing empties into use, she reflected that despite additional resources being put into this area numbers were still rising. Cllr Martin Whelton of Merton echoed recent Local Government Association calls for improved CPO powers as an ultimate sanction against recalcitrant empty property owners.¹⁸

Cllr Diarmaid Ward of Islington drew attention to a recent cause celebre in his borough where 29 large (3 and 4 bed) flats had been kept empty by the Ministry of Justice for many years (originally these were housing staff working at Pentonville Prison). After strenuous complaints from the local authority, negotiations on leasing these to the council had begun, only to be broken off by the Government which then decided to sell them to a private sector developer.¹⁹

Cllr Ward said that EDMO powers needed strengthening to allow action against investor owners who would not make empty homes available for rent and suggested existing powers were particularly ill-suited to high demand areas. He added that CPO powers were weak, and that the local housing crisis was not a legal ground to compulsory purchase empty homes.

Cllr Ward also cited Airbnb sucking homes out of residential supply as a particularly significant problem in Islington with its proximity to the city centre, and said that enforcement of the 90-day limit on Airbnb rental was very difficult and primarily relied on people 'shopping their neighbours'. He also felt that London's devolution of housing powers was inadequate, and that centralisation of powers was a general problem in England, with central Government

determining issues like local landlord licensing when strategic housing responsibility supposedly rested at London level.

Cllr Whelton of Merton was one of several cabinet members to draw attention to the impact of the Building Safety Crisis and its relationship to current development models and volumes. High rise development was seen as an answer to meeting housebuilding targets in many areas, he said, but a deregulated inspection regime had proved 'highly problematic'.

Cllr Whelton expressed frustration at areas such as Battersea where he said thousands of flats had been built with a large number having no one living in them. He also noted, as did other cabinet members from across London, how thousands of social homes had been lost across London to Right to Buy and never replaced, while the current Government focus on shared ownership was creating many homes outside the reach of those in most housing need.

A Rising Tide of Emptiness: What the Empty Homes Officers told us

Empty Homes Officers are responsible for bringing empty homes back to use. Our discussions with London borough Empty Homes Officers in October 2020 were joined by officers representing over half of London boroughs:

Predicting rising numbers of empties

All officers predicted a significant rise in numbers of empties. Some attributed this to the pandemic slowing down the market and reducing demand from flexible renters. Others saw unsold newbuild as significant with pandemic and Brexit uncertainties believed to be combining to impact on city centre newbuild demand. Around this time reports were beginning to circulate suggesting the first drop in London population of the 21st century and that this could be as big as a 700,000 reduction.²⁰

There was also a growing perception that more mobile younger workers and richer families were moving further out, in the case of younger workers to join family and friends or work from parental homes, and in the case of more

affluent owners to seek suburban locations with gardens.

Officers explained how dealing with the pandemic had decimated council budgets despite central Government offering some additional support. Additional workloads and the need to maximise homeworking had in many cases limited inspection and site visits and made outreach to owners of empty homes more complex.

Many had also taken on additional responsibilities to support local services. Some officers felt that these pressures – alongside the pandemic impacting 'lettings of little choice' for city workers, who could now choose cheaper work from home options – were contributing to rising empty homes numbers.

Airbnb's impact revealed

Officers in boroughs such as Camden reported councils being offered a wider and better variety of private lets for families in housing need, though some were reportedly unsuitable, having been converted with small space allocations for Airbnb type usage, rather than as permanent

... officers explained how dealing with the pandemic had decimated council budgets despite central Government offering some additional support ...

... the second homes category in Council Taxbase data reported to Government was seen by many officers as problematic ...

homes. Reports on commercial sites also suggested falls in rental prices, while sale prices of property, in desirable suburban locations in particular, continued to rise, propped up by the stamp duty holiday introduced by Government.²¹

Many officers felt that Airbnb had impacted supply in their boroughs, with an untold number of conversions. There was a general belief that even London Council's one in 50 homes estimate for homes sucked out of residential supply might be a significant under-estimate in more central locations.²² The pandemic was seen to be revealing this in a number of ways as empty Airbnbs entered empty homes or second homes Council Tax categories, or owners sought to switch them to longer term rentals or offer them to councils as temporary accommodation.

Officers from some outer boroughs also reported 'hidden Airbnbs' or other types of lettings where homes had been split into smaller units or partially converted to Airbnb use. There were reports of some 'rental units' being little better than garden sheds or illegally erected extensions let on an unlicensed and poor quality dark market.

Calls for better licensing

All this was felt to support calls for better licensing of the private rented sector as a whole and to emphasise the need for properly

resourced Airbnb licensing schemes at borough level, supported by an income stream such as registration charges and potentially agreed on a pan-London basis.

Several inner London borough officers estimated that as much as 5% of housing stock could be used wholly for Airbnb lettings. Given that several boroughs (Camden, Tower Hamlets and RBKC for example) have between 5 and 10% of stock registered as second homes, this does not seem an unreasonable estimate, while during the pandemic most inner London boroughs still saw thousands of whole home Airbnb lets advertised in each borough.

One officer contended that Unexplained Wealth Orders should be applied to some large empty property holdings in central locations, in some cases bought for cash. There was speculation that the National Crime Agency might be a better investigating body than the local Empty Homes Officer, who had seen large chunks of property bought and converted or simply acquired for development but left vacant, but in both cases remaining out of current residential use.

Second homes aren't what they used to be

The second homes category in Council Taxbase data reported to Government was seen by many officers as problematic. Some officers simply

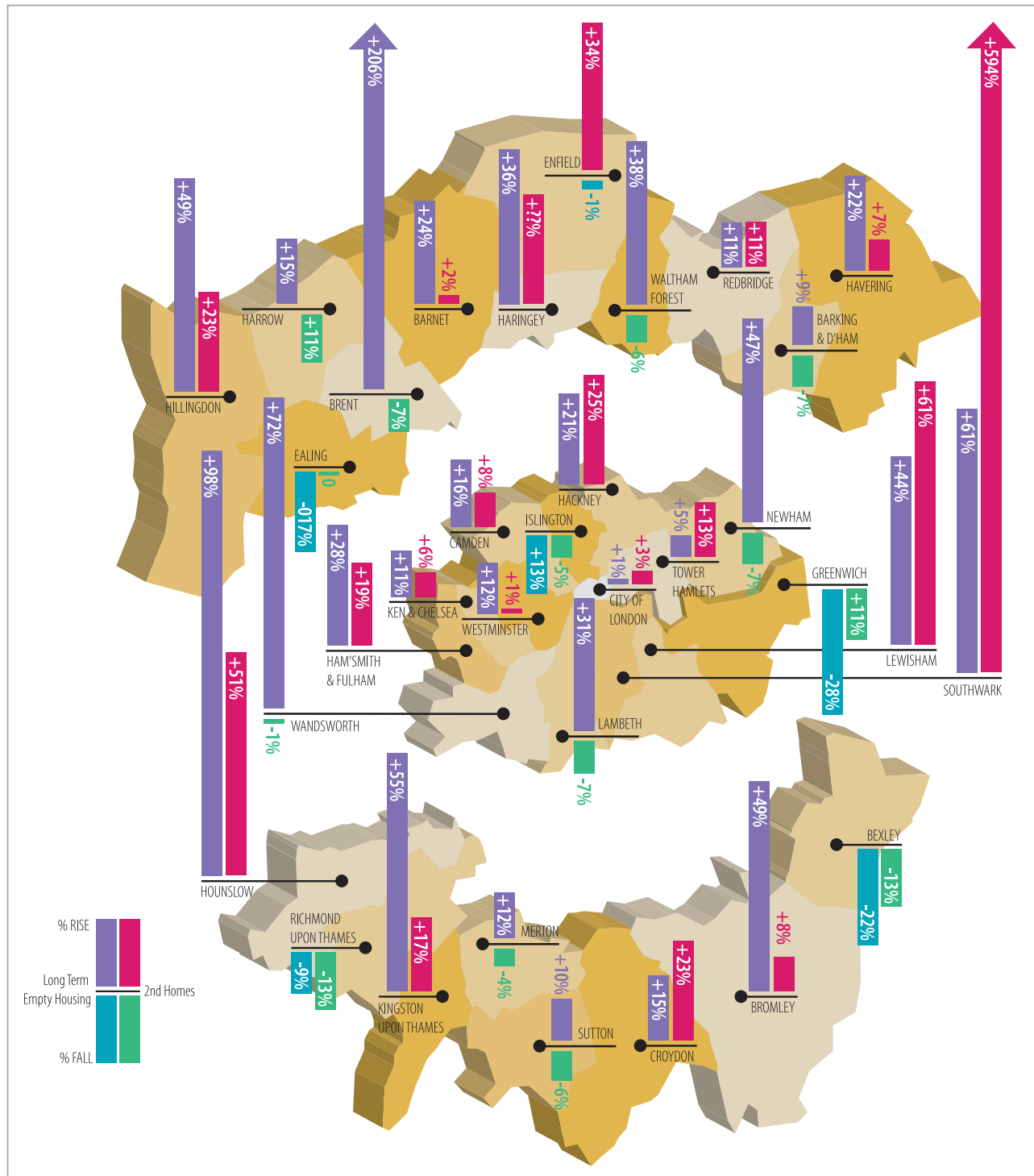
London LTEH inc. change and second homes to show total % housing not in primary residential use

Local Authority	LTEH 2019	LTEH 2020	LTEH CHANGE	LTEH % CHANGE	Second Home 2019	Second Home 2020	Second Home CHANGE	Second Home % CHANGE	Total % not in Primary Residential Use 2020	Pre-pandemic Airbnb 2019 Whole Homes	During Pandemic Airbnb 2020 Whole Homes
Camden	1,241	1,445	204	16	7,525	8,150	625	8	8.60 1 in 12	3,852	1,864
Hackney	1,154	1,392	238	21	728	909	181	25	1.96 1 in 50	3,428	1,167
Haringey	996	1,355	359	36	0	0	0		1.23 -	984	400
Southwark	1,469	2,358	889	61	523	3,630	3,107	594	4.18 1 in 24	2,635	954
Tower Hamlets	984	1,035	51	5	6,240	7,405	1,165	19	6.13 1 in 16	3,950	1,573
Inner Lon. total	12,136	15,457	3,321	27	32,465	38,586	6,121	19	3.39 1 in 29	-	-
Brent	336	1,029	693	206	252	235	-17	-7	1.01 -	1,160	
London total	24,677	30,548	5,871	24	45,731	52,916	7,185	16	2.26 1 in 44	53,445	23,007

referred to these as furnished empties while others contested how their Council Tax departments classified such homes. They argued self-reporting by owners was allowing many

effectively empty homes to shelter within this category with no risk of acquiring Empty Homes Council Tax Premiums. We explore this issue in more detail with data officers overleaf.

Change in numbers of long-term empty homes and second homes in London Boroughs 2019 – 2020
(Official Data from MHCLG Council Taxbase 2020)



Ask me no questions and I'll tell you no lies? What the Council Tax data leads told us

... Haringey chose to declare zero second homes or furnished empties, while other councils declared large numbers ...

Following discussions with Empty Homes Officers and Cabinet Members from across London, we conducted further research with council officers responsible for the collection and classification of Council Tax data.

We received responses from nine boroughs and conducted further detailed explorations of the processes involved with six of these. Responses to general queries confirmed that all the boroughs relied on an initial reporting of the status of an empty property from owners or landlords.

The majority said that the status of a property could be confirmed by a verification visit by officers, but this was likely to occur only if other information suggested a report to be inaccurate, for example if a complaint about problems relating to emptiness contradicted an assertion that a home was in use.

Where a home was classified as a second home this could be based on two factors: either declaration to that effect by the owner, or a council would classify the home as a furnished empty second home on the basis that prior to emptiness it was recorded by the council as a furnished let.

This was where divergence between councils became of interest. Haringey chose to declare zero second homes or furnished empties, while other councils declared large numbers. Looking at Council Taxbase data, we see three London councils plus the City of London with over 5% (1 in 20) of all homes classified as second homes and therefore identifiably not in primary residential use. These were Camden (7%), Tower Hamlets (5%) and Kensington and Chelsea, where a massive 10% of homes are recorded as second homes. In the much smaller City of London 27% of all homes are classified as second homes.

In each case these numbers were broadly around this level pre-pandemic, although all showed rises in 2020, the largest in this group being Tower Hamlets' 19% rise in second home numbers.

Some larger rises were reported in a further group of 5 councils with levels of 2% to 5% second homes, namely Hammersmith and Fulham (up 19%), Hillingdon (up 23%) and Southwark (up 594%), while Westminster (up 1%) and Barnet (up 2%) saw smaller rises. Amongst councils with lower levels of reported second homes, Lewisham's 61% rise and Enfield's 34% were also significant.

Are Airbnbs hiding in the official data?

In Southwark, 3,150 additional second homes were reported in 2020, meaning that numbers rose from around 500 in 2019 to over 3,600 in the riverside Borough, the country's largest rise. Officers reported the majority of the 3,150 newly reported second homes were previously classified as furnished lets; thus, on becoming empty they were formally re-classified as second homes for the purpose of the Council Taxbase.

Tower Hamlets also reported a similar process of classification within its 7,400 so-called second homes in 2020, with 5,630 classified as normally let and 1,635 as not let – that is, out of primary residential use long-term, but potentially used occasionally by owners, or perhaps let on Airbnb.



However, with Tower Hamlets reporting 6,240 second homes in 2019, this classification seemed to have a different relationship to the 2020 data to that in Southwark.

Pre-pandemic commercial data showed around 4,000 whole home Airbnb lets listed as available in Tower Hamlets, suggesting that either a large proportion of its 'normally let (empty) second homes' could be let on Airbnb or that these Airbnb-let homes were normally recorded as primary residences.

The shift in official status to second home for 'normally let but empty' properties was described by Council Tax officers as an unverified administrative process. This raises the question of how London's tens of thousands of whole home Airbnb flats are normally classified. In a more typical year, are many classed as furnished lets or simply as primary residences, or a mix?

In Westminster, several local councillors have raised this issue and are supported by commercial tracking data showing high levels of Airbnb usage of housing. This poses very real questions about the number of homes in primary residential use in that Borough too and how these are recorded and taxed. Without a transparent licensing system and data sharing by short-let platforms, local people and policymakers are left guessing in Tower Hamlets, in Southwark, and across London.

Does Haringey have an answer for second homes?

What is clear is the inaccurate and unhelpful second home definition muddies the water and diminishes public understanding of property use and vacancy. So why not classify such empty furnished homes as simply empty homes, as Haringey claim to do?

Doing this would put them on a pathway toward charging Council Tax Empty Homes Premium after two years, potentially doubling Council Tax, with further increases after longer periods of vacancy.

Oddly, Haringey has one of the lowest levels of Empty Homes Council Tax Premium charging in London, along with Westminster and Tower Hamlets, which both intriguingly feature high levels of second homes. Again, this suggests a

lack of transparency or consistency in how various types of empty home are classified in different boroughs, and in what levels of tax they pay.

Several boroughs, including Southwark, suggested that with no discount available for such so-called second homes any lack of verification of the homes' status was irrelevant, as full Council Tax was being paid. However, the potential income from Empty Homes Premium went unmentioned in this respect, as well as its potential role in encouraging primary residential use.

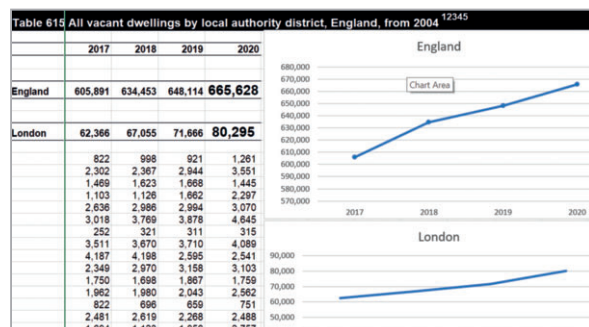
Southwark offer Council Tax discounts on 'genuine' second homes where proof of Council Tax being paid on another home is produced, alongside proof of the genuine second home being a requirement of a work contract. But Southwark currently offer none of these genuine second home discounts on any of the Borough's recorded 3,630 second homes and in recent years state that only a handful (five) have ever been given. So, what exactly are all these 'non-genuine' second homes, if not simply empty homes allowed to stay out of use for as long as owners like, with no extra Council Tax to pay, perhaps waiting until Airbnb demand picks up?

Surplus homes, empty homes and nobody's home at all...

What seems certain from our discussions is that councils' classification of vacancy is at best inconsistent and full of loopholes which can make it difficult to classify many homes kept out of residential use as empty.

This allows those lobbying for development to claim higher levels of occupancy and to effectively conceal the true levels of housing in London kept out of primary residential use. This becomes particularly relevant as an increasing number of analysts and commentators argue that we cannot build our way out of the housing crisis while developments take place in a largely laissez-faire environment, with little constraint on building huge numbers of unaffordable and investor-oriented homes, including homes destined never to actually house anyone.

MHCLG Table 615: All Vacants, London and England totals



AEH has explored the apparent deficiencies in data with the Office for National Statistics and Ministry of Housing Communities and Local Government (MHCLG) and are continuing these conversations. Sandra Tudor, Head of Profession for Statistics at MHCLG, said in a written response "We are aware that there is some variance between numbers across different authorities and indeed authorities do regularly report that they carry out exercises to ensure they have identified properties appropriately. For this reason, we do flag in the statistical release that the results of these exercises can change the number of empty dwellings or second homes between years. Similarly Table 615 which shows vacant dwelling by local authority district in England includes a specific warning that there may be under reporting of some empty properties."

Local planning campaigns and the dominant development model in London

It is important to recognise the pro-development strand in local campaigns as well as the widespread opposition to the current dominant development model. Portraying local campaigners as simply nimbys is inadequate, particularly when so many local campaigns are driven by recognition of local housing pressure and rising homelessness. They contain a strong element of social justice campaigning often founded on the recognition of the contribution made by past investments in social housing stock.

The current development model is seen by such campaigns as focused on bringing in investment while frequently leaving out anything more than a symbolic nod to local housing need. At the core of the argument is that

such development reduces opportunities to address local housing need, rather than simply missing them. They argue that in many cases such models are effectively pursued by both private and local authority developers.

Those boroughs adding social housing stock through estate in-fill projects like Islington will argue they are doing their best to reverse this trend on their own sites, while Camden will argue that its Community Investment Programme has avoided the worst excesses of the investor-led development model on Camden council estates. But it is likely that current controversies will intensify as more radical plans are brought forward, such as proposals to demolish and replace the West Kentish Town Estate.²³

Local planning and housing campaigns offer the prospect of building local coalitions behind development plans which prioritise adding greater numbers of homes that contribute to meeting widely agreed local housing needs. The challenge is in putting together the planning, funding, and site acquisition in an environment of what is in effect global competition for London development sites.

A key point of discussion is whether we can expect to see local politicians of all parties pushing a more ambitious and locally responsive set of housing policies at borough as well as Mayoral level.

Otherwise, as national so-called planning reform moves forward,²⁴ we anticipate a continued descent into a developers' free-for-all in London, as even public ownership of potential sites for development is challenged by national Government policy in the so-called Right to Regenerate.²⁵



What campaigners told us about London's current development model

In London, there is a much-discussed lack of housing, and yet one can barely turn a street corner without seeing clusters of cranes and hoardings boasting 'new luxury apartments coming soon'.

As part of this project, AEH convened borough meetings to examine how our work on empty homes and under-use relates to what motivates local communities. Our aim was to share insights and to learn from those with local knowledge. From this basis we hope to build a coalition of like-minded organisations campaigning around housing access issues in London as we approach borough elections in 2022.

Southwark

Our meeting on Southwark involved a number of local campaign groups including Southwark Defend Council Housing, from whom Tanya Murat spoke at the meeting, along with Bandi Mbubi, director of the Manna Centre for homeless people and families.

A large attendance of over 30 local people included one retired ex-councillor concerned about the direction of local housing policy and the recently appointed Cabinet Member for Housing Cllr Helen Dennis. The Cabinet Member was not a speaker, as meetings were designed to be community and front-line support organisation led.

Southwark has been at the centre of recent housing controversy with a major estate regeneration programme involving the largest remaining stock of council housing in London. Southwark is projected to lose more social homes as a result of its own 'regeneration' policies than any other London borough: it has

already seen a net loss of 860 council homes from completed regeneration schemes, while a further 1,700 losses are projected from schemes already granted planning approval by 2020.²⁶

However, a shift may be becoming apparent, with a major purchase of homes to add to social housing stock on the Aylesbury Estate Regeneration,²⁷ and the launch of a new and more ambitious Empty Homes Strategy to coincide with National Empty Homes Week 2021.²⁸

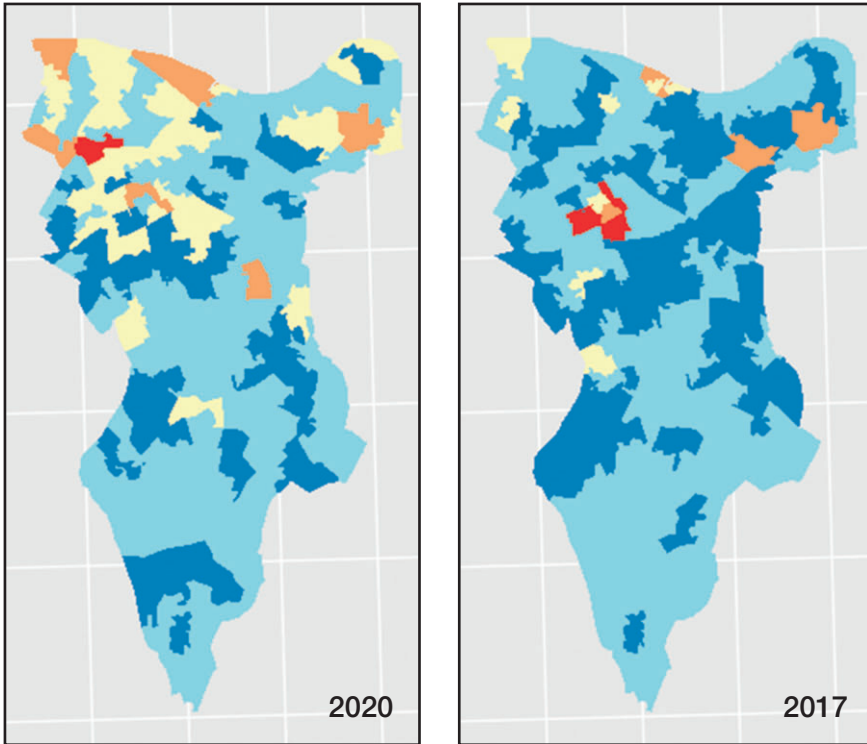
The council also called for, '*a "quicker, cheaper, and simpler" compulsory purchase process for long-term empty homes, lifting the caps on Council Tax premiums for empty homes, new planning powers that require occupation a certain period after the home is completed, and a review of second homes in general.*'

The Council have also promised to consider the use of empty council stock awaiting 'regeneration' for homeless families as a means of reducing the use of out of borough temporary accommodation.

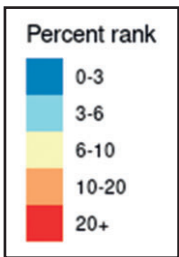
Southwark saw huge rises in empty and second homes numbers in 2020 (60% and almost 600% respectively²⁹). The latest official data takes known vacancy to around 6,000 long-term empty and second homes – or one home in every 24 in Southwark with no primary residential use.

Furthermore, data gathered from Freedom of Information requests by University College London researcher Jonathan Bourne showed a significant increase in vacancy across the Borough between 2017 and 2020 – with particular concentrations in areas, including the

... there is a much-discussed lack of housing, and yet one can barely turn a street corner without seeing clusters of cranes and hoardings boasting 'new luxury apartments coming soon' ...



Southwark discrete Change in Empty Homes 2017 to 2020



riverside, featuring large numbers of recently constructed investor-oriented housing developments.

In the March 2021 meeting, much debate focused on such riverside ‘dark towers’, as well as blocks of both private and social housing reportedly completed but unoccupied. Examples were cited of developments dominated by under-occupation and huge numbers of Airbnb flats, which have no residential use year-round. Our meeting presentation featured AirDNA data showing that even at the height of the pandemic, over 1,000 whole homes in Southwark were being advertised on Airbnb.

Hackney

AEH’s meeting in Hackney featured organisations involved in front-line homelessness alleviation and support, including Street Storage³⁰ and Hackney Community Law Centre,³¹ as well as the Morning Lane Peoples Space (MOPS) campaign³² and local individuals and campaigners. Local debate in Hackney has focused on definitions and proportions of affordable and what is now termed ‘genuinely affordable’ housing, as well as the need for new homes at ‘council housing rents’.

Local activists in the MOPS campaign have focused on concerns about redevelopment proposals for a site on Morning Lane,³³ currently occupied by a Tesco superstore. The site has been acquired for £60m by Hackney Council. Concerns over the choice of developer³⁴ and lack of transparency were compounded by the absence from development proposals of the social housing desperately needed in one of London’s poorest boroughs.

Hackney Council has only demanded a minimum of 20% ‘affordable housing’ on the site,³⁵ local campaigners have pointed out that this is well below Mayor of London, Sadiq Khan’s 50% target.³⁶ This raises the question of whether the Mayor can intervene to raise this, as he has previously on other key sites, often pushing through planning permission after raising affordable housing elements in the schemes.³⁷

The elected Mayor of Hackney, Philip Glanville, said in a Mayor’s Question Time (May 2021)³⁸ that the future of the Morning Lane site is not finalised, stating ‘the ball is still with the developer’, who is yet to submit a final planning application, while the deal between the selected developer and Hackney Council is set to run out in May 2022. Mayor Glanville’s assertion during this question time that the cost of acquisition of the site would make the delivery of council housing difficult seems arguably unambitious. However, he concedes there may be a greater role for the council in the development’s future, should the current deal expire.

The Morning Lane People’s Space (MOPS) Campaign says, ‘*We oppose the current plans for 55 Morning Lane in Hackney Central and demand an alternative plan including at least 50% council housing. The developer’s current proposal includes tower blocks of up to 19 storeys with over 500 housing units, NO council housing and only 20% of the units being “affordable”.*’

Camden

Our meeting in Camden explored the local debate about council development and estate regeneration priorities. It featured a number of tenants’ representative organisations and local group Neighbours of West Kentish Town, who campaign for more social homes and the preservation of local green spaces.

The meeting also featured a presentation from local planning and housing campaigner Fran Heron (Chair of Camden Town District Management Committee³⁹), who recently campaigned against a Camden Council decision to sell a portion of Purchase Park in Somers Town to Hong Kong-based developer Prime Pacific *‘to create an investment platform for Asian investors with keen interest to invest in the London residential market’*.⁴⁰

Heron’s presentation, ‘Housing is Key’,⁴¹ focused on the factors currently preventing new social housebuilding at scale, ranging from ‘global speculative development in capital cities’ like London, to the classification of areas of London as ‘opportunity areas’ for intensive development under Mayor Boris Johnson⁴² (a policy continued under the current Mayor); and the overlapping impact of ‘multi-layer planning policies’ (the National Planning Policy Framework, GLA / Mayoral level, Camden Borough policies and the Euston Opportunity Area).

Her presentation went on to look at ‘factors preventing building low-cost homes for working class families’ in which she included the revolving door between local councils and higher political office or property development, and the similarity of objectives between senior planners, developers and ‘regen gurus’. Heron argued that it is not only Conservative boroughs where housing in accordance with need is no longer a priority, while even existing insufficient ‘affordable’ housing targets are often not met.

Beyond individual developments, debate in Camden centres upon controversial aspects of the Council’s Community Investment Programme (or CIP).⁴³ Working with local supporters, the local Green Party has produced a significant body of work challenging some of the CIP’s original assumptions.⁴⁴ They believe scrutiny has improved the Programme, although this hasn’t stopped Somers Town’s investment tower on the contested Purchase Park site.

Thus far the CIP has added council homes to Camden’s stock, through a mix of infill and replacement. In total CIP aims to build 3,050 homes including 1,100 council homes and 300 affordable homes. To date 975 new homes have been built through CIP, of which 433 were council homes (197 of which were replacement).

Future phases of the programme continue to prove controversial as plans for the demolition and replacement of West Kentish Town Estate progress,⁴⁵ having been put to a resident ballot, with 93% of eligible voting residents vote ‘Yes’ to the council’s proposals.

Haringey

Our meeting in Haringey came following a period of significant engagement with local campaigners, councillors, and local MP Catherine West, after AEH published a briefing⁴⁶ on Haringey’s housing in mid-2020 which included an examination of its unique status as the only borough in the country to report no so-called second homes or furnished empties. The briefing noted that while Haringey reported no data to the Government in the ‘second homes’ category of the Council Taxbase, ‘Neighbouring boroughs contain over 13,000 second homes, and London’s other 32 boroughs declare 46,000.’ This figure has now risen to 53,000, while Haringey still declares none. Following questions about its empty homes strategy, the Council has adopted new policies that toughen its stance.⁴⁷

Discussion on housing in the Borough still clearly bore the legacy of the previous council political leadership’s efforts to drive through the Haringey Development Vehicle deal with Lendlease which would have seen the council hand over its whole housing stock to the joint venture for eventual renovation or in most cases demolition and replacement.

Deep suspicion of local housing policy remained among local campaigners and civil society organisations, many of whom had united in opposition to the council’s ‘all eggs in one international property company’s basket’ strategy. The new administration, at that time led by Cllr Joseph Ejiofor, had inherited a host of development headaches, such as the Seven Sisters ‘Latin Corner’⁴⁸ development proposals and proposals for the Love Lane Estate.⁴⁹

Local activists drew attention to housing developments prioritising small private rental and private sale flats over family homes and the low level of social housing contributions in many major development schemes. New

... local activists drew attention to housing developments prioritising small private rental and private sale flats over family homes and the low level of social housing contributions in many major development schemes ...



hi-rise towers aimed at investor purchasers boasting of rental yields and featuring overseas sales brochures were also highlighted. This is

particularly pertinent in a borough which classes all homes as either a

primary residence or an empty home, yet fails to demonstrate

that it is accurately assessing the impact of non-residential lettings - so-called Airbnb flats or Airbnb hotels, as mentioned in the 2020 report and reported in *Wired*.⁵⁰



Haringey currently boasts a number of major developments featuring thousands of new homes being built for private sale or private rental, primarily in Tottenham and the Haringey Heartlands (Wood Green) area. The Borough has also recently committed to a new 1,000 home council housebuilding programme.⁵¹

The Latin Village development proposal now appears dead in the water after developer Grainger pulled out citing local opposition and rising costs for its 190 unit Build to Rent scheme.⁵²

Brent

Our Brent meeting, arranged jointly with local campaigners Fairer Housing in Brent – Partners for Change, differed from other meetings in having a local council speaker as well as community organisations and residents, at the request of the local organisers. It was attended by a wide mix of local housing campaigners, interested residents and several councillors (over 40 people attended via Zoom).

Speakers included, among others, Sahra Jama, of Stream Skills Advancement; Cllr Margaret McLennan, Deputy Leader of Brent; and Jacky Peacock of Advice for Renters. Other local organisations included Wembley Matters.

The meeting focused on the lack of affordable and secure tenancies and the poor quality of council temporary accommodation in a converted office building, Prospect House, where speaker L'Oreal Williams had been housed by Brent Council in 2016.⁵³

Difficulties in dealing with both private and social landlords were discussed, with one resident saying, 'It's as if they think you should just shut up because you're so lucky to have a home'.

2020 Housing data saw Brent report a rise of 206% in long-term empty homes (London's largest percentage rise) up by 693 to 1,029. Local residents noted how the pandemic had revealed increased numbers of empty homes – some possibly used as short-term lets in a borough that had over 1,100 whole home Airbnb lets pre-pandemic and over 750 still advertised during national lockdown.

Local campaigners argued that Right to Buy sales should be at local boroughs' discretion, and that new mixed (market and social) developments should be built to be 'tenure blind', so as to encourage community cohesion. Calls were also made for a campaign to get landlords and owners of empty property on-side regarding getting homes into use, to help alleviate a desperate local housing crisis which saw 3,000 households on the council's priority register and 17,000 with no priority and little hope of ever obtaining social housing. Brent's social housing stock has been more than halved since the 1980s.

One attendee suggested failure to crack down on poor landlords and those sitting on unlet empty homes might indicate that many councillors are themselves landlords, given the explosion of buy-to-let purchases since the 1990s.

Empty Homes enforcement action was felt to be weak locally, though recent efforts to build new council homes⁵⁴ were praised, as was council interest in buying street properties as part of a programme to move homeless families out of temporary accommodation. However, past purchases had included many homes outside Brent and around a third outside London.⁵⁵ Reference was made to the findings of the Brent Poverty Commission (2020),⁵⁶ which states, '*The cost of housing in the Borough is a particular challenge and impacts directly on the levels of poverty... Poverty rates [in Brent] almost double when housing costs are included.*'

Conclusion: It's time we stopped building empty homes

We need to end the reliance of our current development model on the sale of large numbers of homes to investors, who can then choose to leave them empty or let them exclusively on short-term platforms like Airbnb.

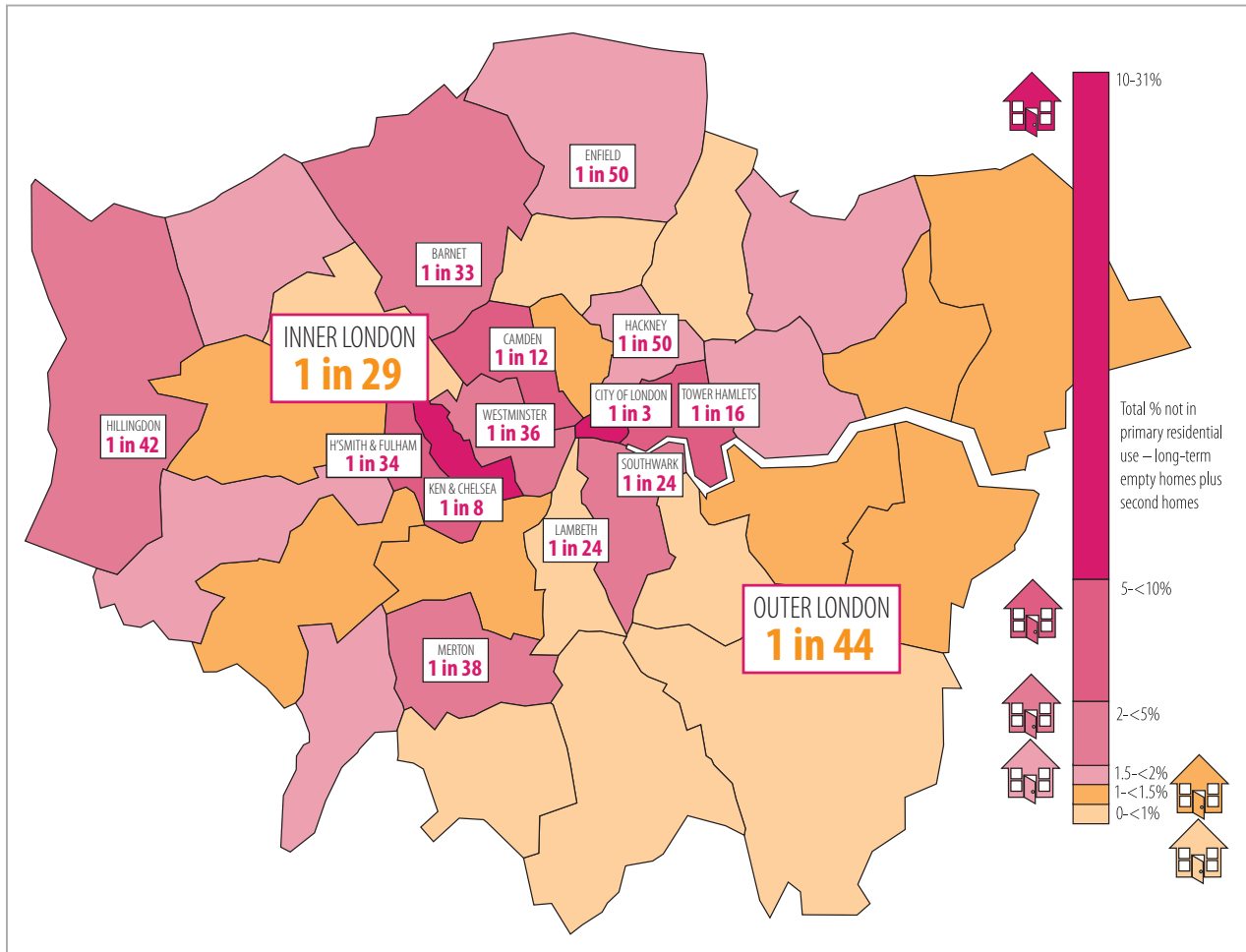
Boroughs including Islington and Camden have used planning powers or leasehold constraints to try to ban some newbuild homes from entering this market. This is a positive step, not least because it recognises the issue those protesting about 'dark towers' and 'lights out London' have long complained of: that a significant proportion of housing counted as

part of much-needed residential supply never actually houses anyone at all.

Enforcement of planning measures in particular is complex and requires resourcing. A licensing scheme for short-term lets, alongside a wider landlord licensing scheme and register of property usage, could resource this via license fees and penalties and aid its implementation through improved and more comprehensive data.

Once such data is available, other measures to shift the balance toward primary residential occupation could be examined, such as vacancy taxes on unused homes, as in Vancouver.⁵⁷

Nobody at Home: The Homes kept out of residential use long-term in London Boroughs
(Official Data from MHCLG Council Taxbase 2020)



Looking forward to 2022 and building a Coalition calling for Action on Empty Homes

AEH will be campaigning to raise the issue of under-use and vacancy across London in the run-up to the 2022 London Borough Elections.

It is time local communities were given the power to prioritise the use of wasted empty homes for those in housing need and to stop the development of empty, under-used and unaffordable housing while acute local housing needs go unmet.

As part of this work, we are collaborating with other organisations to build a broad coalition of organisations to campaign for change, the Campaign Against Empty Homes. This campaign already involves members of many political parties and the following organisations:

- Action on Empty Homes
- The Big Issue
- Defend Council Housing
- Disabled People Against Cuts
- Fuel Poverty Action
- Greater Manchester Housing Action
- Homes for All
- Labour Homelessness Campaign
- People Before Profit
- Radical Housing Network
- Renters' Rights London
- Social Housing Action Campaign
- Streets Kitchen
- Street Storage
- Unite Union London and South East and London Region
- Unite Community London and Eastern Region
- Yes to Fair Redevelopment

To join the campaign or find out more see: www.actiononemptyhomes.org/campaign

On 9 October the Campaign Against Empty Homes will be holding a National Day of Action under the banner 'We are in a housing, climate and health emergency - take action on empty homes', drawing attention to the role that retrofitting empty homes can play in helping to meet the climate emergency.

The following recommendations are drawn from our discussions with local communities and key stakeholders and will be at the heart of our campaign.

Recommendations

- *London boroughs need to take action on empty homes, adopting more robust strategies to challenge emptiness of all types*

We have seen some positive steps from boroughs as diverse as Haringey and Southwark, but strategies need resourcing and enforcing to impact on growing numbers of homes not in residential use.

It is undoubtedly true that central Government could better support and resource this through legislative changes offering councils better, easier and quicker powers such as the reformed Empty Dwelling Management Orders suggested by several boroughs including Conservative-led Kensington & Chelsea.

Southwark, meanwhile, is just one of many boroughs to have backed the Local Government Association's call for a streamlining of compulsory purchase powers as an ultimate sanction against the most recalcitrant owners, who seem happy to let property fall apart,



perhaps to facilitate demolition and redevelopment, or simply through neglect and intransigence or lack of capacity.⁵⁸

■ *Bringing wasted empty homes into use is critical for sustainability and a RetroFirst approach is crucial in addressing our climate emergency*

The UK has Europe's oldest and worst insulated housing, but increasingly is also being challenged by the need to cool some homes in summer, as average temperatures rise. Addressing our climate emergency is intricately linked to modernising and retrofitting our housing stock and improving housing standards for those on lower incomes.

Arguments around the redevelopment of council estates are often linked to improving insulation and modernising services such as heating, or cooling. However, the latest work on measuring the carbon footprint of development has led a wide coalition of organisations to argue for a RetroFirst approach.

In this context, empty homes and council estates in need of refurbishment can help lead the retrofit revolution needed to respond to the climate emergency; as Architects Journal have said as part of their RetroFirst campaign, 'the most sustainable home is always the one that is already built'.⁵⁹

This argument has a more fundamental resonance for campaigns to bring empty and under-used homes into residential use, because if the most sustainable home is the one already built, then the least sustainable home is the one built with a huge carbon footprint in a modern hi-rise tower and never lived in by anyone at all.

■ *Airbnb needs tighter regulation and data sharing with borough enforcement teams*

In boroughs with a huge stock of homes out of residential use, many counted as second homes, as well as thousands of Airbnbs, there are clear gains to realise from restricting short lets to ensure large numbers of homes cannot be used exclusively for this purpose, instead of

as residences. Evidence suggests the problem is widespread, with London Councils reporting one home in 50 across London may have been sucked out of use in this way - a loss of up to 70,000 homes.⁶⁰

At the very least licensing of short lets is required with the option to restrict license numbers as introduced in Barcelona.⁶¹

With Airbnb now sharing host lettings data with the Inland Revenue, the argument against its sharing this with council enforcement teams appears ever more spurious.⁶²

■ *A Vacancy tax is needed*

Vacancy taxes on the Vancouver⁶³ model penalise owners of any home not actually lived in as a primary residence. In a city like London with Europe's largest and most lucrative short-let market this is not the only measure required. Planning controls and locally determined licensing of Airbnbs, at borough level, are also needed to ensure the balance is shifted towards primary residential use for many of the so-called homes currently only available as short lets for leisure and tourist use.

■ *The second homes category must be reformed or abolished*

While some categories of empty evade Council Tax premiums and other enforcement through sheltering under the guise of second homes, this status can be challenged. Haringey's insistence that it counts all homes out of residential use as empty homes opens an intriguing question as to whether this Council



... we are collaborating with other organisations to build a broad coalition of organisations to campaign for change, the Campaign Against Empty Homes ...



Tax status can be voluntarily abandoned by boroughs to put more empty homes on the path toward enforcement action. AEH supports the calls increasingly being made from boroughs like Southwark for a review of this category by Government, and MHCLG specifically, to accurately determine the real use, if any, of these so-called 'homes'.

■ **A transparent national register of residential property ownership and usage is required**

Local communities need to be able to distinguish in planning terms the usage of homes and where relevant to control the impact of non-residential usage such as holiday homes and short lets.

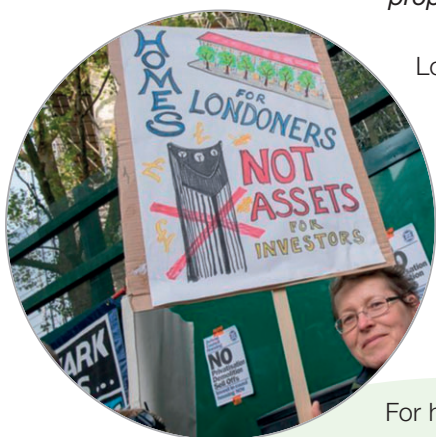
Such uses must not be allowed to drive local people into poverty or homelessness.

For housing targets to be meaningful, local policymakers require accurate assessments of housing usage and ownership, which can only be delivered by transparency around the beneficial ownership and usage of residential property.

This is why a transparent national register of residential property ownership and usage is required alongside a national landlord register and effective, locally determined licensing of the leisure rental and short-let markets.

■ **A new Government-funded programme of support for enforcement, incentives and investment at local level is needed**

The London Mayor has recently made central Government Affordable Housing funds available to buy back council homes sold through right to buy.⁶⁴ AEH agrees with the Affordable Housing Commission suggestion that a similar approach should be taken to buy empty homes and private rented sector empties for renovation and refurbishment as council or social housing.⁶⁵



Several boroughs including Camden and Barnet currently offer leasing or council tenant nomination schemes to empty homes owners accompanied by hefty grants of around £25,000 to help bring homes back into use at a decent standard, while Brent is actively leasing and buying homes to move homeless families out of temporary accommodation.

London needs more of this and needs it better resourced, both to meet urgent housing need in London and to avoid the negative impacts on neighbours and neighbourhoods of housing left unoccupied for long periods.

■ **Local Planning must be meaningful, informed and not undermined by national planning policy**

Local efforts to determine social housing contributions and to regulate rental markets should be supported, not undermined, by the National Planning Policy Framework; moves to further centralise and de-regulate planning threaten the limited powers now available to local communities and their political representatives.

Even prior to current controversial proposals⁶⁶ to zone all land across the country for potential development or preservation,⁶⁷ national planning guidance has generally undermined local communities' attempts to develop neighbourhoods in line with local priorities. In particular, the 'presumption in favour of sustainable development' and the Government's building-in of a 20% minimum net margin for developers⁶⁸ have both helped developers challenge local communities' efforts to oppose or amend proposals, and both have been used



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