



HOME AGAIN

A 10-City Plan to rapidly convert empty homes into social rent homes

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EXECUTIVE SUMMARY	03
1 – INTRODUCTION	05
2 – CAUSES AND IMPACTS	07
3 – THE 10-CITY PLAN	10
4 – HOW WOULD IT WORK?	16
- Sufficient capital grant - 17	
- Clear strategic direction - 18	
- Significant resource to build capacity - 23	
- Legal and tax changes - 26	
5 – SOCIAL HOMES OVER EMPTY HOMES	29
Annex 1 & Annex 2 – <u>see separate document</u>	

CONTENTS

Executive Summary

There is a housing emergency in this country, with 1.3 million households on social housing waiting lists across England and over 140,000 homeless children in need of good quality and genuinely affordable social homes.¹

10,500

Long-term empty homes could be turned into social rent homes in three years across 10 cities.

We need at least 90,000 social rent homes delivered every year in England, for 10 years, to end homelessness and house most of the people on waiting lists.²

To get to 90,000 new social rent homes a year we need a comprehensive plan. Later in 2024, Shelter will set out measures to hit this target. An upcoming report will focus on how government can: 1) increase direct social rent delivery by councils, housing associations and Community Land Trusts, 2) unlock a higher delivery of social rent homes through the planning system, 3) introduce innovative land value capture reforms to secure additional social rent homes and speed up delivery, and 4) bring forward brownfield sites for social rent delivery.

20%

Cheaper than the usual cost to deliver social rent homes in the 10 target cities.

In the meantime, a smaller, but crucial part of this puzzle is the need to tackle privately-owned long-term empty homes (LEH).³ This 10-City Plan sets out how a new government could invest £1.25bn in central grant funding to rapidly convert 10,500 empty homes into social rent homes in the first three years of a new government.

There are challenges in implementing an empty homes programme so it can only form part of a wider programme of mass social housebuilding. To be suitable for use as social rent, empty homes must be well located and in reach of health, education, and transport infrastructure.

This is why the 10-City Plan models what an empty homes programme could look like for **Newcastle, Greater Manchester, Liverpool, Bradford, Sheffield, Birmingham, Bristol, Greater London, wider Bournemouth area, and Plymouth.**

This report finds that, across these 10 cities, an empty homes programme:

- **Offers substantial societal benefit** – over three years, empty home acquisition and conversion could quadruple current social rent delivery across the 10 cities, helping these local authorities tackle local waiting lists and decrease reliance on expensive temporary accommodation.
- **Has a strong fiscal rationale** – converting homes costs comparatively less to central government, with required grant funding on average 20% below the usual cost to deliver social rent homes in these areas, and in some cities reaches 55%

¹ Homelessness figures are from: DLUHC, Statutory homelessness statistics, table TA1. Waiting list figures are from DLUHC: Table 600.

² Bramley, G. (2018) *Housing supply requirements across Great Britain: for low-income households and homeless people*. London: Crisis and National Housing Federation and Shelter (2018) *A vision for social housing*.

³ See Annex 1 for a definition and explanation of the category 'long-term empty home'.

less cost.⁴ In addition, the 10-City Plan would create £28.7m in housing benefit savings per year.⁵

- **Would reduce embodied carbon and support retrofit** – refurbishment is associated with between 50 and 75% less embodied carbon on average per unit than a new build.⁶ It also offers a golden opportunity to retrofit these homes in the process of conversion.

To make this plan a reality, this report sets out 10 key recommendations for the next government:

£1.25bn

Investment in empty home acquisition and conversion to social rent.

1. **Invest £1.25bn grant in a long-term empty homes programme** to bring suitable empty homes back into use in the target 10 cities. Back this with a clear strategy to convert them into social rent homes and include potential to expand funding beyond this geography once proof of concept is established.
2. **Ringfence empty and second home Council Tax premiums** for LEH acquisition and conversion.
3. **Ensure there is available low-cost patient capital** for empty home conversion (e.g. through government offering a guarantee for private loan financing).
4. **Support for local authorities and social landlords to boost capacity** – with resource funding to expand councils' empty homes teams; knowledge sharing roadshows between councils already taking action and those that want to; and a central compulsory purchase and empty homes 'flying squad' to support ambitious local authorities across the country.
5. **Funding for community organisations** to take the initiative in their local area.
6. **Exempt sellers of long-term empty homes from a proportion of Capital Gains Tax** if selling to a council, housing association or community group for social rent.
7. **Strengthen compulsory purchase powers** (see Annex 2) for social rent delivery and streamline Empty Dwelling Management Orders and Enforced Sale enforcement mechanisms.
8. **Tighten the definition of the long-term empty home category** to ensure empty homes that are meaningfully empty but misclassified as second homes are correctly classified. Put the onus on the owner to prove regular use.
9. **Further increase the Council Tax premium for long-term empty properties**, reducing the length of time before they apply and making the maximum application mandatory for local authorities.
10. **Ensure** business rates and a Council Tax premium apply to short-term lets.

The next government has the power and capability to end the housing emergency – full stop. They must urgently act to ramp up the construction of 90,000 new social rent homes per year across England. As demonstrated here, those in power can start by supporting a locally driven plan to convert LEHs into desperately needed social rent homes.

⁴ The average grant funding needed to deliver a social home across the 10 cities is around £184,500, compared to the estimated £147,500 grant required to purchase and refurbish a long-term empty home across the 10 cities. Average grants rates are from [NHF figures, updated by CEBR](#), page 16

⁵ Figures on the average housing benefit saving per household moved into social housing in each region are [from CEBR: The economic impact of building social housing](#), page 49. To work out the amount that could be saved in the 10-city plan, we multiplied the number of homes proposed to be acquired in each area by the average housing benefit saving in the relevant region.

⁶ American Institute of Architecture. [Embodied Carbon](#).

1. Introduction

1.3m

Households on the social housing waiting list.

261k

Long-term empty homes.

England is in the grip of a housing emergency, driven by a chronic lack of investment in social housebuilding.

We have seen our social rent housing stock reduce by hundreds of thousands in the last decade alone.⁷ As a result, 1.3 million households are now on the social housing waiting list, while 230,000 families live in damaging temporary accommodation (TA). The next government must build at least 90,000 new social rent homes each year for a decade in England to end the housing emergency. But a properly resourced mass social housebuilding programme will take time to begin delivering at these levels.

The acquisition and conversion of privately-owned long-term empty homes has the potential to rapidly expand social rent delivery in the early years of a new parliament and can act as a cost-effective and greener complement to a mass social housebuilding programme.

Public frustration at the inefficient distribution of housing across England is growing and people are demanding urgent action on empty homes. There exists no



⁷ Net reduction in social homes is due to private sales through Right to Buy, conversions to other tenures, and demolition.

“Market-only solutions that prioritise private housing delivery at the cost of genuinely affordable social homes will only worsen the affordability crisis”

greater symbol of our country’s failed housing policies than the 261,000 homes that sit long-term empty, unoccupied and unused, while 309,000 people across England are homeless. By bringing empty residential properties back into use as social housing we can start to put things right and transform England’s empty housing stock into homes again.

Addressing empty homes will not solve England’s housing problems alone. And market-only solutions that prioritise private housing delivery at the cost of genuinely affordable social homes will only worsen the affordability crisis at the heart of our housing system. Too many new private builds end up empty, bought as buy-to-leave financial assets for investors, and too many local people see homes built that they could never afford. Social rent homes are the only type of housing that guarantees genuine affordability, and we need 90,000 of them delivered every year for 10 years to end the housing emergency. Only an expansion in social housebuilding construction across England can deliver the scale of social homes we need.

But empty homes can help us make a start. Utilising a bespoke data set and evidence-based assumptions, the 10-City Plan shows how many LEHs could be acquired and converted in 10 target cities within the first three years of a new government, and at what cost. It’s been done before – both at scale with the post-war housing initiatives and on an ad hoc basis in more recent funding programmes. And although more comprehensive current strategies like the Greater London Authority’s (GLA) Right to Buy Back programme haven’t specifically focussed on empty homes, they too prove there is a strong rationale to acquire as well as build.

If the future leaders of this country are to do all they can to end the housing emergency, large-scale acquisition of empty homes is a worthwhile addition to our national and regional policy tool kit. We must rapidly expand social rent delivery as early as possible during the next parliament to meet this country’s urgent housing need. We’ve used empty homes to achieve this in the past. We can use empty homes to help do it again.

Credit: [Canopy Housing Leeds](#)



2. Causes and Impacts

What are the causes of empty homes?

Broadly, there are two main overarching reasons for empty homes:

- Personal reasons – this includes circumstances like deaths and inheritance, family disagreements, mental and physical health, moving into care homes, personal finances and capacity, or a general unwillingness to bring an empty home back into use.
- Housing market inefficiencies in:
 - Low demand areas – where there are relatively low land values and rents, private housing can often sit empty because private investors and landlords see limited financial returns in bringing them back into use on the private market e.g. as a private rental or sale. Crucially, many of these areas have significant social housing shortages and major shortfalls in low-cost long-term quality rented homes, so there is significant need at the low-end of the market.
 - High demand areas – where land values and rents are high, house prices tend to increase significantly over time. This is often exploited by ‘buy or build to leave’ investors who treat housing purely as a financial asset rather than a home. See Box 1 below for more details.

The focus of this report is on privately-owned ‘long-term empty homes’ as a specific category of empty home. This category excludes homes that are empty for ‘legitimate’ reasons or empty for less than 6 months – see Annex 1 for more details.

What are the impacts of empty homes?

LEHs are worsening the housing emergency. They are a waste of England’s housing stock and exacerbate housing shortages and affordability issues.

In areas where there are high concentrations of empty homes, they degrade our communities.

Greater Manchester resident, Hope Barnes:

"Walking round Greater Manchester, it's all too clear that the city is littered with high numbers of empty homes, many unoccupied for years. For those of us struggling to find decent housing we can genuinely afford, it's insulting that many homes sit empty for long periods. It's a sharp reminder of successive governments' failure to address the housing emergency. We need more social rent homes and we need them now!"

“We need more social rent homes and we need them now!”

“Housing has become an asset, not a home”

BOX 1. EXPLAINER – EMPTY HOMES AS ASSETS: STRUCTURAL CAUSES AND SOLUTIONS

Housing has become an asset, not a home, bought and sold for its financial value, increasingly detached from its social purpose as a place of shelter and comfort.⁸ Many current and newly built private houses are bought by investors to sit empty, or immediately rented out as luxury flats, and won't be lived in by those with a housing need.^{9,10}

Successive governments' over-reliance on a private-only housing delivery model will not fix the housing emergency. In fact, it has helped cause it. The Letwin Review confirmed how private developers have little incentive to improve local market affordability. To sustain a profitable business model most will only build as fast as the absorption rate will allow.^{11,12} The fact that empty homes exist and that there are extremely low levels of housing delivery in areas where there are high levels of homelessness and low land values shows that relying on profit incentives is not sufficient for an efficient and effective housing system. As such, rents within the private rented sector continue to skyrocket all over the country¹³, while homeownership stays out of the reach of the vast majority of people who do not already own property.¹⁴

Social housing is the answer. Only the delivery of a new generation of social rent homes, with rents tied to local incomes, will end the housing emergency, providing genuinely affordable housing for our families, our friends, and our communities. The 10-City Plan will help to achieve this, while correcting inefficiencies in how our housing stock is used.

But there are wider structural problems that need addressing to make housing home again. As the only form of recurrent property taxation in England, Council Tax ought to incentivise the most societally beneficial use of our housing stock. But the regressive and inequitable nature of Council Tax is in dire need of improvement if it is to effectively curtail the use of property as a financial asset and reassert the social use value of our housing as a home.¹⁵ It can also be used to speed up the build out rates of private developments to make private housing delivery work for society as well as the developer.¹⁶

A forthcoming report from Shelter will set out our proposals for Council Tax reform to address housing market inefficiencies and help deliver the building of new homes for social rent.

8 Josh Ryan-Collins et al. 2017. Rethinking the Economics of Land and Housing. New Economics Foundation.

9 Private housing demand is elastic – it can usually absorb increases in private supply. Elasticity in housing demand has been fuelled by the wide availability of mortgage debt, the explosion of property prices since the 1970s, and England's relatively very low taxes on property which have made housing an extremely financially attractive investment.

10 Action on Empty Homes. 2020. [Homes without residents](#).

11 Absorption rate is the speed at which new private housing delivery is consumed by the market.

12 Sir Oliver Letwin. 2018. [Independent review of build out: final report](#). Ministry of Housing, Communities & Local Government and HM Treasury.

13 Shelter. 2023. [814,000 private renters under threat of eviction this winter](#).

14 FT Adviser. 2022. [Three quarters of Britons feel homeownership is out of reach](#).

15 Institute for Fiscal Studies. 2020. [Revaluation and reform: Bringing council tax in England into the 21st century](#).

16 LGA. 2021. [Over 1.1 million homes with planning permission waiting to be built - new LGA analysis](#).

17 Wendy Wilson. 2023. [Empty housing \(England\)](#). House of Commons Library



3. The 10-City Plan

It's time for the next government to spark the most ambitious and societally beneficial transformation of empty homes in recent political history.

Within just 10 cities, £1.25bn in central grant funding for empty home acquisition and conversion would likely deliver more than 10,500 social rent homes over the first three years of a new government and significantly increase social rent delivery rates locally in the short-term. This will transform lives, providing genuinely affordable homes for people stuck on the social housing waiting list or trapped living in TA.

The findings of the 10-City Plan are built upon evidence-based assumptions and modelling data inputs (explained further in Annex 1 - Methodology), namely:

- an evidence-informed baseline assumption that, with sufficient investment in empty home acquisition and conversion and necessary legislative change, 20% of LEHs across the 10 cities could be brought into use as social rent homes over the next three years
- a time period of approximately eight months is required to acquire, refurbish, and convert a long-term empty residential property into a social rent home, based on consultation with councils and additional experts
- cost-modelling of average LEH prices across different Local Authority District (LAD) areas within England, provided by University College of London (UCL)

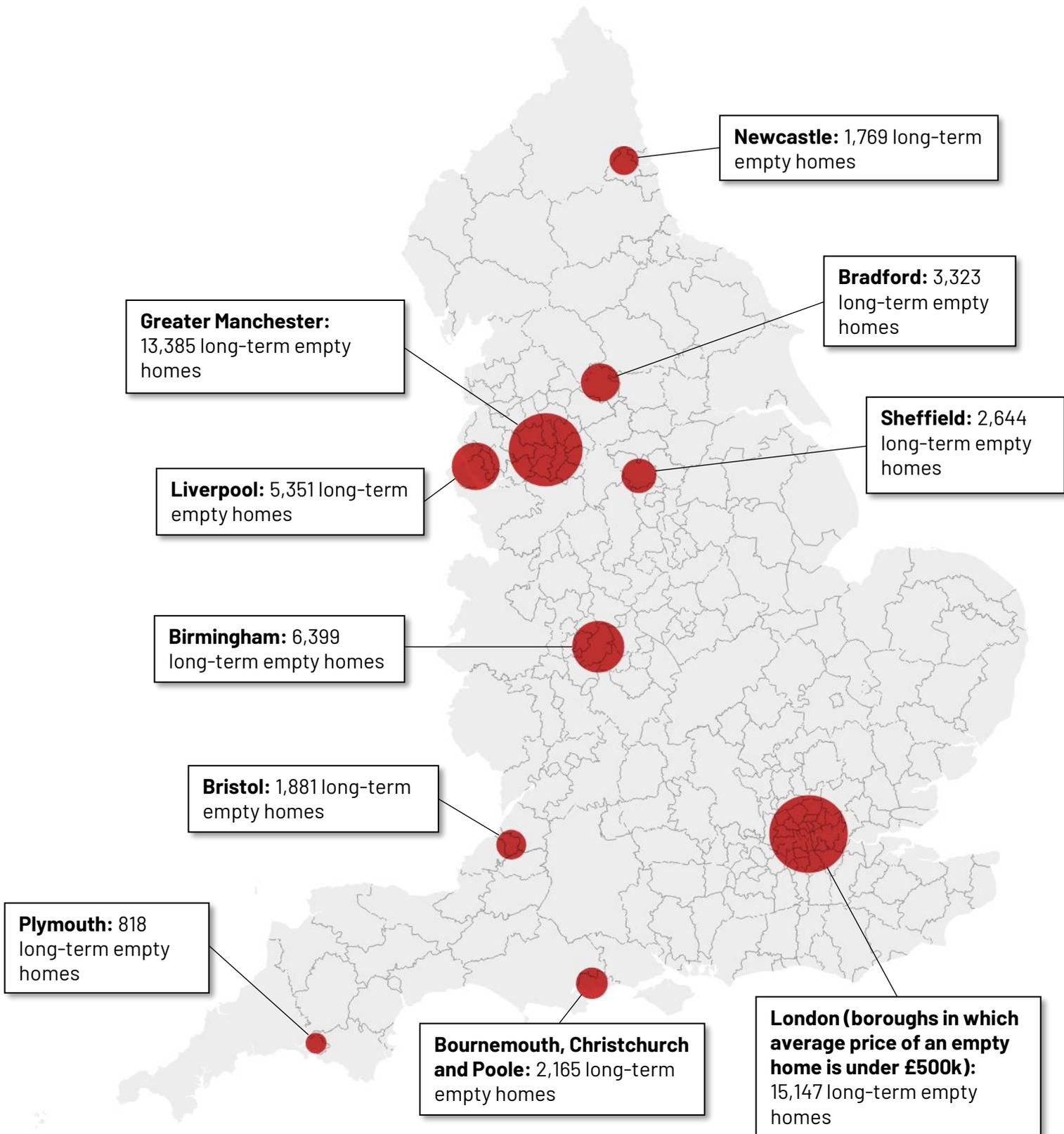
Newcastle, Greater Manchester, Liverpool, Bradford, Sheffield, Birmingham, Bristol, Greater London, wider Bournemouth area (BCP), and Plymouth¹⁸. In all of these 10 city areas, like the rest of England, there exists a huge demand for social rent homes. Similarly, like much of England, these cities have a staggering number of LEHs. The 10-City Plan tackles these issues head on, delivering desperately needed new social rent homes while reducing the number of empty residential properties. Our findings are presented in Table 1, and Map 1 shows the geographic scope of the plan.

Just the 10 cities? The 10-City Plan should be monitored and once proof of concept is established, government should consider expanding funding beyond the scope of the 10-City Plan into other areas within England.

¹⁸ For the purposes of this report, our definition of 'Greater London' only includes boroughs where the average price of a long-term empty home is below £500,000. Our definition of the 'wider Bournemouth area' is based on the Bournemouth, Christchurch and Poole singular Local Authority District area. See Annex 1 for more details.

10 Cities Mapped

The number of long-term empty homes in 10 cities across England.



Source: DLUHC Table 615 • Created with Datawrapper

10 CITY PLAN - DATA AND FINDINGS

Number of long-term empty homes converted into new social rent homes within LAD areas

City-based Local Authority District (LAD) areas	Number of long-term empty homes in 2023 (DLUHC data)	Average purchase cost of long-term empty homes (UCL data)	Current grant funding to build a new social rent home	Estimated total grant needed per empty home - (50% of average cost of home + cost refurbishment)	Number of new social rent homes in the last 3 years (2020/21 to 2022/23)	10-city modelled scenario - 20% converted	Estimated total grant required
Birmingham	6,399	£185,617	£141,948	£110,650	521	1,280	£113m
Greater Manchester	13,385	£166,541	£156,468	£101,082	1,113	2,677	£216m
Bournemouth, Christchurch and Poole	2,165	£379,642	£159,953	£207,962	87	433	£72m
Newcastle	1,769	£146,146	£149,242	£90,853	95	354	£26m
Sheffield	2,644	£169,485	£165,764	£102,559	2	529	£43m
Bradford	3,323	£115,339	£165,764	£75,402	7	665	£40m
Bristol	1,881	£335,636	£181,154	£185,891	413	376	£56m
Plymouth	818	£170,368	£181,154	£103,002	85	164	£13m
Liverpool	5,351	£186,730	£156,468	£111,208	10	1,070	£95m
Greater London (all 15 boroughs with average long-term empty house price <£500k)	15,147	£436,676	£252,646	£236,567	1,074	3,029	£572m
All ten cities	81,414	£259,313	£184,469	£147,611	3,427	10,576	£1.25bn
All cities excluding Greater London	51,120	£188,118	£157,103	£111,904	2,535	7,547	£674m

Table 1



Our modelling of the 10-City Plan, as set out in Table 1, provides three major findings:

- **Substantial societal benefit** - over three years, empty home acquisition and conversion would dramatically increase current social rent delivery across the 10 cities overall, potentially quadrupling it.
- **A strong economic rationale** - costs would remain low to central government, with required grant funding on average 20% below the usual cost to deliver social rent homes in these areas.¹⁹ In Bradford, findings show a 55% reduction in cost. In addition, as our recent report on the economic impacts of increasing social housing supply shows, delivering social rent homes creates savings in housing benefit and TA spending. For instance, the 10-City Plan would create an estimated £28.7m in housing benefit savings per year.²⁰
- **Tip of the iceberg** - the 10-City Plan's 10,500 new social rent homes are locally significant, but with 1.3 million households on the social housing waiting list, empty home conversion will not end the housing emergency. Even a national-scale empty home conversion programme that achieved higher acquisition rates than the 10-City Plan would be nowhere near enough on its own to meet this need.

£28.7m

In housing benefit savings per year.

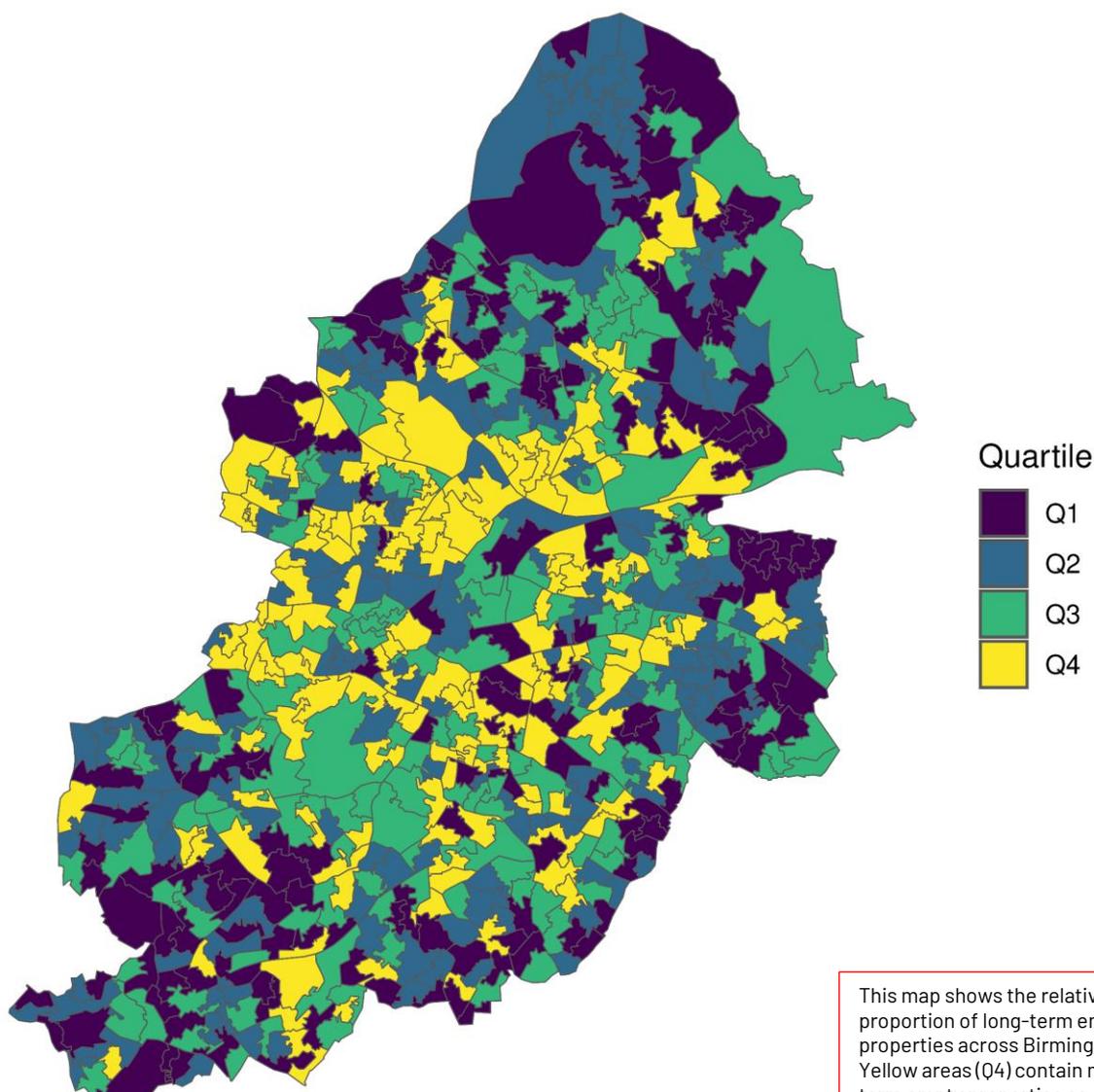
¹⁹ The average grant funding needed to deliver a social home across the 10 cities is around £184,500, compared to the estimated £147,500 grant required to purchase and refurbish a long-term empty home across the 10 cities. Average grants rates are from NHF figures.

²⁰ Figures on the average housing benefit saving per household moved into social housing in each region are from [CEBR: The economic impact of building social housing](#), page 49. To work out the amount that could be saved in the 10-city plan, we multiplied the number of homes proposed to be acquired in each area by the average housing benefit saving in the relevant region.

Box 2. Birmingham City Council area – Case study

Over the last 40 years, the chronic lack of government funding for new social rent homes has massively hindered the ability of local councils to build. National governments have prioritised the delivery of private and ‘affordable housing’ (with rents at up to 80% of market rate) over social rent homes. At the start of the 1990s, Birmingham was delivering on average around 1,350 social rent homes a year. This number was well below pre-1980s levels. But it’s got worse. Over the last three years, Birmingham City Council has only been able to deliver 173 social rent homes on average per year. With over 20,000 households on its social housing waiting list, the council has now declared a housing emergency.

Only a mass social housing construction programme will address this staggering level of need. While this is being ramped up, LEH acquisition and conversion could alone more than triple the average annual delivery of social rent homes in Birmingham from 173 to around 600 social rent units over the next three years. With over 500 Birmingham households in bed and breakfast temporary accommodation, this could provide rapid, life-changing new homes for the people of Birmingham within just one year. It would also alleviate some of the huge daily financial strain on the council’s budget from the housing emergency. The next government must provide sufficient funding and support early on in its term to ensure this happens.



Map: Jonathan Bourne, UCL²¹

This map shows the relative proportion of long-term empty properties across Birmingham. Yellow areas (Q4) contain more long-term empty properties as a proportion of the total properties in that area, and dark blue (Q1) areas contain fewer.

21 Custom map created by Bourne. Map data is from Bourne, J. (2019): *Empty homes: mapping the extent and value of low-use domestic property in England and Wales*. Palgrave Commun.



“Refurbishment in comparison to new builds is associated with between 50 and 75% less embodied carbon on average per unit.”

Empty home acquisition and conversion reduces embodied carbon and supports retrofit. It’s vital that carbon involved in the delivery of new housing, including new social homes, is minimised. Driving a more efficient use of our vacant housing stock is a great way to do this. On average, refurbishment in comparison to new builds is associated with between 50 and 75% less embodied carbon on average per unit.²² Empty home acquisition and conversion is also an important opportunity to retrofit England’s housing stock. Current and new housing, including social homes, must meet high energy-efficient standards. This is a prerequisite to ending fuel poverty for the 3.26m households experiencing this injustice²³ and delivers a range of additional co-benefits such as better health outcomes and local stimuli to job creation and the economy.²⁴

The review of the Decent Homes Standard presents an opportunity to reduce the environmental impact of this regulation while also strengthening the minimum standards it sets for social housing. This could thereby decrease the embodied carbon involved in empty home refurbishment even further.²⁵

The refurbishment and retrofit of empty homes should not leave work to do later at greater expense to tenants and the public purse. Government must get it right the first-time round. There is no more opportune moment to retrofit a home than when it is empty and recently brought into social ownership.

22 American Institute of Architecture. [Embodied Carbon](#).

23 Department for Energy Security and Net Zero. [Annual Fuel Poverty Statistics in England, 2023 \(2022 data\)](#). Fuel poverty statistics.

24 Becci Taylor. [How retrofitting homes can also tackle health issues and inequality](#). Arup.

25 The removal of ‘age’ from the definition of disrepair would prevent this inaccurate indicator of standard leading to perfectly functional components, e.g. kitchens and bathrooms, being ripped out and taken to landfill.

4. How Would it Work?

To unlock the benefits of the 10 City Plan, central and regional government must take the following four steps forward.

-
- 1 Sufficient capital grant** to social landlords and community organisations to fund the acquisition and conversion of empty homes.
 - 2 Clear strategic direction** for social landlords and community organisations addressing empty homes to focus their efforts on acquisition and conversion to deliver social rent homes.
 - 3 Significant resource to build capacity** within social landlords and community organisations to fulfil this directive.
 - 4 Legal and tax changes** to maximise the number of empty homes that social landlords and community organisations can acquire.

The following four subsections set these out in more detail.

1

Sufficient capital funding from central government

To secure the 10,500 new social rent homes that could be delivered by the 10-City Plan, government will need to provide approximately £1.25bn in grant funding²⁶ over three years to social landlords and community groups, so they can acquire and convert LEHs into social rent homes. Government should work with key stakeholders such as regional and city mayors to achieve this. Cost modelling within the 10-City Plan provides a good basis for the next government to design funding levels, whether that be a separate funding pot or an incorporation of extra grant into the current and future Affordable Homes Programmes.

“Government should work with key stakeholders such as regional and city mayors”

If the income from empty and second home Council Tax premiums was ringfenced for LEH acquisition and conversion, indicative estimates suggest this could provide the councils included within the 10-City Plan with around £89m a year overall to support their empty homes programmes.²⁷

Funding the conversion of the right type of homes. The provision of new central funding should contain a precondition that empty homes for acquisition and conversion are located in areas with sufficient amenities, infrastructure and economic opportunity (hence our broad-brush urban focus on 10 cities).

Empty homes that do not meet these preconditions should only be acquired and converted into social rent homes if accompanied by a wider investment strategy for the area. For instance, this could be especially important to address clusters of empty homes in remote areas or neighbourhoods that have been subject to systemic underinvestment by government. Empty home conversion in itself can be used to catalyse community based, positive regeneration initiatives.^{28 29}

Predetermined regional thresholds on maximum acquisition and refurbishment costs should also be incorporated to secure value for money in an appropriate manner.

While the 10-City Plan’s findings are based on LEH acquisition, there is no blanket reason why social landlords and community organisations shouldn’t open-market acquisition other low-use categories of homes where sensible and appropriate.³⁰

Cheap and reliable financing. Government should ensure cheap finance is easily available for social landlords and community groups to access.³¹ Those who receive grant funding to acquire and convert LEHs into social rent homes will likely borrow money in addition to capital grant funding. As is usually the case, private borrowing helps to cover the rest of the cost of social housing delivery that isn’t fully funded by central government grants.³²

26 Grant funding is the amount of initial investment from central government to deliver a social rent home.

27 In line with our calls for a mandatory application of increased Council Tax premiums (see Subsection 4.4), we have assumed an average 100% premium on all long-term empty homes within each city area. This is an indicative estimate as 1) the Council Tax premium percentage applied on long-term empty homes varies significantly across the time period a home is empty for and between different authorities, 2) there is no comprehensive data available on this.

28 Alex Diner. 2023. [The community right to buy: how housing acquisitions can regenerate left behind communities, improve standards, and decarbonise homes](#). New Economics Foundation

29 Scottish Empty Homes Partnership. 2020. [Empty Homes Value Tool](#).

30 See Annex 1 for more detail on other types of empty home.

31 For instance, the Public Works Loan Board and the Affordable Homes Guarantee.

32 As set out in the methodology in Annex 1, our modelling assumes a grant rate of 50%.



2

Clear government direction to focus efforts on social rent delivery

To initiate a step change in approach to addressing empty homes within the sector, central and regional government must provide clear strategic direction, alongside ample funding and resource to social landlords and community organisations for acquisition and conversion, as guided by the 10-City Plan's recommended process below. The success of the Scottish Empty Homes Partnership (SEHP)³³ in driving a national shift towards tackling empty homes stands as a powerful testament to the potential for Westminster to deliver positive changes in how we tackle empty homes here in England.

1) Identify, 2) engage, 3) acquire, 4) take ownership, 5) refurbish and convert, 6) allocate.

These are the six key steps to transform a privately owned, long-term empty residential property into a social rent home. From a societally wasteful and damaging stain on our communities to an urgently needed, genuinely affordable home for our families, friends, and neighbours to live in and enjoy, and for future generations to benefit from too. Diagram 1 below sets out the necessary steps for acquisition and conversion by councils ('1st' and '2nd' choice approaches) to deliver social rent homes, as well as alternative routes to bring empty homes back into use that should be explored when acquisition is not possible.

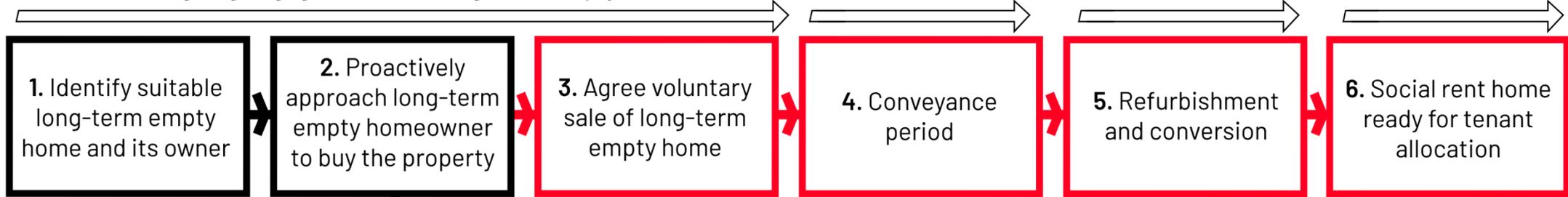
Steps 1 & 2. In line with current practice, **proactive and continuous dialogue and engagement** by local councils with long-term empty homeowners will be crucial to **identify acquisition opportunities**. Councils, as is normally the case, can use Council Tax records to identify and contact empty homeowners.

The SEHP was set up in 2010. It is hosted by **Shelter Scotland** and funded by the Scottish Government. Its work supports the Scottish Government's commitment to bring empty homes back into use as affordable housing where possible and support local housing priorities. As part of this, it supports and encourages local authorities to develop and implement a strategic approach to mapping and managing empty homes work. 27 out of 32 Scottish local authorities have employed Empty Homes Officers since the partnership commenced.

³³ See box to the right

PROCESSES TO BRING LONG-TERM EMPTY HOMES BACK INTO USE

Continuous ongoing engagement with long-term empty homeowners



Local authority undergoes a Compulsory Purchase Order (CPO) in cases where appropriate and applicable to deliver a social rent home (see our recommendations for CPO reform in Annex 2 of the report). The threat of CPO alone can also encourage the empty homeowner to sell voluntarily.

Unable to convince long-term homeowner to sell voluntarily

Alternatives to acquisition that deliver temporary affordable housing:

- Empty Dwelling Management Orders (EDMO) enable a local authority to take temporary management of a property empty for a minimum of two years and use it as affordable housing for a period of time up to 7 years before returning it to the owner.
- Purchase/lease and repair are voluntary schemes which involve a social landlord or community organisation offering to refurbish the empty property of an empty homeowner. In exchange, the social landlord or community organisation can arrange to temporarily manage the property as social housing or secure a sub-market let by the owner themselves for a set time period.

Alternatives to acquisition that bring empty homes back into private use:

- Low-interest loans and/or grants can be provided to an empty homeowner to encourage them to refurbish their property and bring it back into use (e.g. by living in it themselves or renting it out privately).
- If the long-term empty homeowner is in significant council tax debt, a local authority can use Enforced Sale powers to force a change in ownership. This route does not guarantee a new use for the property.

KEY

- Initial default approach
- 1st choice approach
- 1st choice approach timeline
- 2nd choice approach
- Standard alternative processes



“Most acquisitions will be through voluntary sale”

Step 3. Based on our modelling of the 10-City Plan, during the first three years of a new government, and subject to necessary resourcing and legislative change, social landlords and community organisations should be able to identify a continuous, **rolling supply of LEH acquisitions.**

Most acquisitions will be through **voluntary sale** but, as is currently the case if an empty homeowner refuses to bring their property back into use, **Compulsory Purchase Orders (CPO)** should be used by local councils in a supportive capacity where appropriate. This will help to acquire long-term empty properties in certain cases when open-market acquisition is not possible. CPO has repeatedly been shown to be an effective, although currently cumbersome, tool to bring empty homes back into use (see Box 3 and Annex 2).³⁴

- Note: in cases of compulsory purchase, this will add an additional stage to the process, thereby lengthening the timescale for acquisition and conversion. However, the threat of a CPO is often sufficient to prompt empty homeowners to sell.³⁵ Furthermore, in line with our recommendations on CPO reform set out in Annex 2, a streamlined and more effective CPO process will help to ensure councils embark on the CPO route sooner in their approach, as opposed to it being an absolute last resort.

It's vital that councils, housing associations, and community organisations work together to acquire, refurbish, and convert empty homes into social rent homes:

- in addition to their own proactive work, housing associations and community organisations should also liaise with councils to identify acquisition and conversion opportunities and vice versa
- small and/or specialist housing associations and community organisations may often be best placed to own and manage individual properties that might otherwise create a challenge for stock holding local authorities and large housing associations
- it's useful for non-stock holding authorities to transfer empty homes that they acquire to local housing associations and community groups to take on and manage³⁶

³⁴ CPO is a common approach for councils in England. In Scotland, [Glasgow City Council](#) have pursued 52 homes for compulsory purchases since 2019 under current CPO regulations. Almost three quarters of these have been progressed or confirmed. Glasgow, as a non-stock holding authority, use 'back-to-back deals' whereby they have a further sale to a housing association lined up when they commence CPO proceedings to ensure these properties come back into use as social housing and don't just sit on their books.

³⁵ Following on from Footnote 34, of the 'unsuccessful' CPO orders out of the 52 pursued by Glasgow City Council, 13 owners opted to sell voluntarily to housing associations and a further 2 properties have either been sold or occupied by family members meaning that the planned CPOs were discontinued.

³⁶ Non-stock holding authorities are local councils who no longer directly own any social housing. This is usually because they have transferred their social housing stock to housing associations. Non-stock holding authorities should be encouraged and supported to directly build, own and manage social housing again.



Credit: [Canopy Housing Leeds](#)

Step 4. Once acquisition is secured, **conveyance periods to transfer ownership** through open-market acquisition will generally take around three months.

Step 5. Once the legal transfer of the property to the appropriate party has been finalised, **refurbishment** will generally take between one and five months depending on the standard of the property. This is a generous time period³⁷ and is still far quicker than traditional development through planning permission which generally takes 18 months to 5 years for completion even from grant of outline planning permission.³⁸ The property can then be **converted to a social rent home**.

While some empty homes will be in significant disrepair, in the absence of national data, The Empty Homes Network estimate that around 80% of these homes require minimal work and will therefore be quick and cost-effective to refurbish to a decent standard.³⁹ This stage of refurbishment is also an ideal time for **retrofit**. Shelter is currently undertaking further research into social rent delivery under the Future Homes Standard and meeting net zero targets. Our cost modelling (as set out in Annex 1) includes an ample £35,000 in refurbishment cost per unit which takes into account some of the potential to retrofit which other funding pots should also contribute to. Many empty homes will require far less investment and some none at all.

“Around 80% of empty homes require minimal work and will therefore be quick and cost-effective to refurbish to a decent standard”

Step 6. And then, it's ready for **allocation**. Delivered to an energy-efficient, high-quality standard. Ready to be lived in and enjoyed.

³⁷ As informed by consultation with local councils, experts on empty homes, and examples of previous acquisition programmes and general refurbishment times.

³⁸ Lichfields. 2020. [Start to Finish - What factors affect the build-out rates of large scale housing sites?](#)

³⁹ It is also the case that derelict properties are not included in categories of empty homes within Council Tax records.

Wasted opportunities. In tackling empty homes, acquisition is the only way to deliver permanent social rent homes and should therefore be prioritised. But countless possibilities to deliver social rent homes have been and are being missed. Under the current Affordable Homes Programme 2021-26, cash-strapped social landlords and community organisations cannot access sufficient funding to acquire and retain ownership of empty residential properties to convert them into social rent homes.⁴⁰

Despite the incredible work these organisations do, they are therefore generally limited to bringing empty homes back into use as temporary affordable housing or for private use, as set out in the ‘standard alternative processes’ boxes within Diagram 1 above. The case study in Box 3 demonstrates this point, while Box 4 below provides additional context of previous government programmes.

A shift in government direction would immediately change the game and help to end this opportunity cost, delivering much needed social housing.

As Bradford City Council, a non-stock holding authority⁴¹, explains in relation to empty homes:

“Additional funding directed at our housing partners would help ensure that suitable properties acquired by the local authority could be disposed of to the social provider sector, giving us the confidence that the property will be renovated to a good standard and would represent an increase in the number of permanent social rent homes which in turn will help alleviate the social housing waiting list.”

Box 3. Birmingham City Council – strong local effort, weak national government

Underfunding by successive governments is leading to substantial opportunity costs in tackling empty homes. This drives inefficiencies that can undermine the efforts of social landlords. For instance, where empty homeowners cannot be traced or are unwilling to bring their property back into use, Birmingham City Council’s empty homes team carries out important work to compulsorily purchase these properties. However, the limited funding available for their empty homes operations means they must normally sell these properties on the open market to quickly recuperate their costs.

In one such example, the council’s empty homes team compulsorily purchased an empty home and as usual sold it on the open market, in this case for £155,000, only for the council’s Property Acquisition Service to later secure funding to buy the property back to provide valuable accommodation for a family who were previously in immense housing need. Government funding should have been available from the start.

Make social rent homes delivered through acquisition permanent. Government should require that social landlords and community organisations exempt new social rent homes from Right to Buy and tenure conversion if delivered through empty home conversion, perhaps as a further precondition for funding. Government must enable this to happen. Privatisation of this stock runs the risk of these homes becoming empty again in the longer term.

⁴⁰ The current Affordable Homes Programme 2021-26 actually recommends a purchase and repair model as its favoured approach to bring empty homes back into use but still does not provide sufficient funding for this. See MHCLG. 2020. [Capital Funding Guide](#).

⁴¹ See footnote 36.

3 Significant resource to build capacity within social landlords and community organisations

Building capacity in social landlords. Government must provide sufficient revenue funding to grow the capacity of social landlords to tackle empty homes and convert them into social rent homes if the 10-City Plan's full potential is to be unlocked. As explored in Boxes 4 and 5, this could help kickstart an increase in social rent delivery within councils. The use of an CPO and Empty Homes 'flying squad' would be useful to get councils up to speed.⁴²

"In the late 1970s in England, local authorities purchased up to 14,000 properties annually, many of which were empty, as a way to deliver social housing."

BOX 4. Why has social rent delivery through empty homes initiatives reduced to a trickle?

Government initiatives to acquire empty residential properties and convert them into social rent homes have been commonplace historically but only happen today on a very small, ad hoc scale. During the **Second World War and post-war period** up to the 1980s, acquisitions were a common route for social landlords to expand their housing stock.^{43 44} In the late 1970s in England, local authorities purchased up to 14,000 properties annually, many of which were empty, as a way to deliver social housing.⁴⁵

However, the delivery of social rent homes ceased to be a national priority in the 1980s. Instead, national focus moved towards the delivery of private housing and, as time went on, new types of 'affordable housing' which, with rents at up to 80% of the market rate, aren't really that affordable at all. This shift in focus was reflected in how empty homes were addressed too.

For instance, £1.7bn was invested by the last **Labour government's New Deal** to regenerate deprived communities and tackle empty homes, with an additional £730m levered in from other public, private and voluntary sector sources.⁴⁶ But insufficient emphasis was given to expanding social housing stock. New Labour also introduced the Empty Dwelling Management Order (EDMO) which enabled local authorities to compulsory lease LEHs, for example to provide temporary affordable housing. As a House of Commons report states, the Coalition government brought in a series of reforms to restrict the use of EDMOs.⁴⁷ Because of the many hoops that local authorities must jump through to implement an EDMO, as well as the restriction on the use of EDMOs as an absolute last resort, uptake of this measure has been relatively low, even before its watering down.⁴⁸ Our plans for CPO reform in Annex 2 will prevent a repeat of this problem occurring for CPO deployment in the 10-City Plan.

The **2010-2015 Coalition Government** implemented a specific Empty Homes Programme as part of the 2011-15 Affordable Homes Programme, the last of its kind to date. This provided over £100m in grant funding to social landlords and a further £50m to community organisations to bring empty homes back into use. However, grant funding was again insufficient to deliver permanent social rent homes through this scheme. Temporary affordable homes (for instance through lease and repair models as set out in Diagram 1 and Box 6) and private housing were therefore the main output of this programme.

Between **2016 and 2021**, empty homes ceased to be a national priority. There was minimal emphasis on bringing empty homes back into use within relevant funding programmes.⁴⁹ This has allowed empty homes to proliferate, with the number of long-term empty homes across England increasing by 31% since 2016.

As such, while societally beneficial, recent initiatives to address empty residential properties have missed a significant opportunity to deliver more social rent homes. Only social rent homes guarantee a permanent, genuinely affordable housing option for current and future generations to live in and enjoy.

42 See Annex 2 for more detail.

43 Affordable Housing Commission. 2020. [A National Housing Conversion Fund: Buying properties to boost affordable housing supply.](#)

44 Alan Holmans. 2005. [Historical Statistics of Housing in Britain.](#) Cambridge Centre for Housing and Planning Research.

45 Alex Diner. 2023. [The community right to buy: how housing acquisitions can regenerate left behind communities, improve standards, and decarbonise homes.](#) New Economics Foundation.

46 Elaine Batty. 2010. [The new deal for communities experience: a final assessment.](#) Department for Communities and Local Government. London: Communities and Local Government. 2010.

47 Wendy Wilson. 2023. [Empty housing \(England\).](#) House of Commons Library.

48 Wendy Wilson. 2019. [Empty Dwelling Management Orders \(EDMOs\).](#) Housing of Commons Library.

49 Homes and Communities Agency. 2016. [Shared Ownership and Affordable Homes Programme 2016-2021 prospectus.](#)

The good news is that empty home acquisition and conversion is not overly-resource intensive (typical empty homes council teams operate with around 1-4 officers) and substantial capacity already exists within the sector to ramp up acquisition straight away. The majority of local councils across England already have an empty homes function. Those councils that do not have an empty homes team could generally set one up within 3-6 months, as advised by the Empty Homes Network.⁵⁰ The Scottish Empty Homes Partnership confirms the achievability and benefits of building up capacity: in Scotland in 2022, 95% of the empty homes brought back into use were in areas where the council employs staff with time dedicated to tackling the issue of empty property.⁵¹

Councils should also ensure that empty homes teams and property acquisition teams collaborate effectively. Current council acquisition teams are a significant available resource to support empty home acquisition.

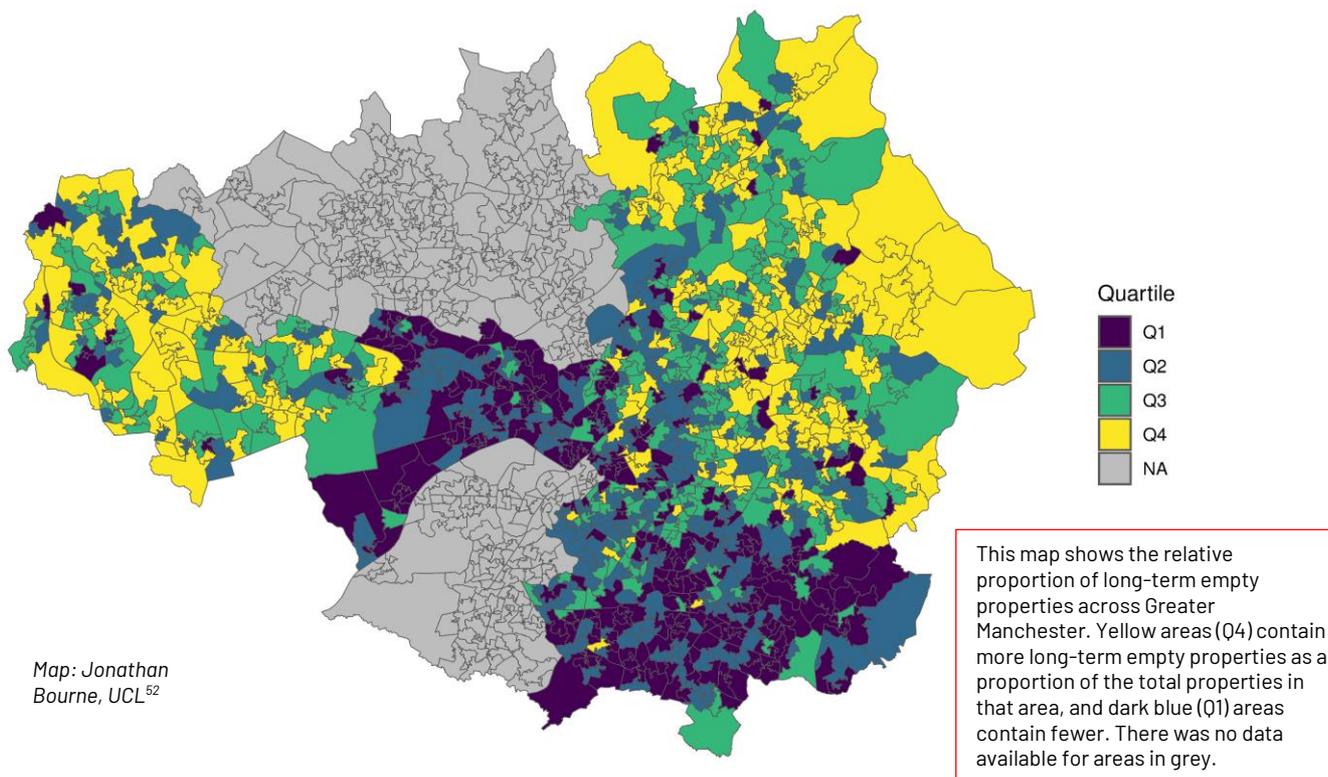
BOX 5. Greater Manchester case study

Local authorities across Greater Manchester are experiencing unprecedented levels of housing need. This is placing them under increasing financial pressure from the huge outgoings on TA and emergency homeless intervention. Shelter has heard directly from leaders of local authorities in Greater Manchester about the urgent need to deliver far more social rent homes and the strong appetite of these councils to do exactly this.

If the next national government increases funding for new social rent homes, councils and housing associations will be able to ramp up construction levels over the medium term. But in the meantime, Manchester’s social landlords, if given sufficient support and direction from national government and the Manchester Combined Authority, could start converting many of the 13,385 homes which sit long-term empty in this region into social rent homes.

In accordance with our modelling, this alone could more than triple the current annual delivery of social rent homes within Greater Manchester from 371 to around 1,260 units within the first three years of the next government. This would transform the lives of hundreds of families and households each year.

The relatively light resourcing requirements to acquire and convert LEHs could thereby act as a transformative stepping stone that many councils need to start ramping up their delivery of new social rent homes. Our findings indicate that only around £72m extra in central grant funding per year would be required to deliver this increase of 2,677 social rent homes over three years, at about 65% of the cost if delivered through traditional means.



50 This estimation is based on the time taken for a local authority to implement an empty homes strategy, set up a service and employ a dedicated officer from scratch. This timescale includes provision scrutiny meetings, budget and proposal writing, and approval from cabinet.

51 Scottish Empty Homes Partnership. 2022. [Annual impact report 2021-2022](#).

52 Custom map created by Bourne. Map data is from Bourne, J. (2019): Empty homes: mapping the extent and value of low-use domestic property in England and Wales, *Palgrave Commun.*



Building capacity in communities. In addition to social landlords, communities often rally together to address empty homes within their areas, harnessing local skills and the efforts of volunteers whose capacity would otherwise remain untapped.⁵³ Addressing empty homes also brings significant direct and indirect social and economic benefits to the respective local community.⁵⁴

This should be supported and harnessed. There are countless inspiring examples of community organisations and volunteers working to bring empty homes back into use, often as genuinely affordable homes for their neighbourhood. However, government's lack of funding and strategic direction risks wasting this valuable resource.⁵⁵

The case of Groundwork, as set out in Box 6 below, is a compelling example of both the strength of community organisations to address empty homes, as well as the threat they now face due to underfunding.

BOX 6. The success and limitations of the Groundwork model

The success. For the last 12 years, Groundwork Greater Manchester, a community-based registered charity, has delivered a housing refurbishment programme, focused on bringing empty homes back into use as temporary affordable housing and training local people with green skills.

Kickstarted with a £200k grant from the Coalition Government's Empty Homes Community Grants Programme (EHCGP), Groundwork renovated 16 empty properties between 2012 and 2015 and worked with pre-approved registered providers to manage the properties at affordable rents based on Local Housing Allowance rates. They also used this opportunity to include retrofitting energy efficiency to reduce emissions and tenants' bills. Groundwork leased the properties from their owners for an agreed time period based on the extent of refurbishment after Rochdale Borough Council supported Groundwork to identify empty homes to target.

The initial injection of capital expenditure from the EHCGP allowed Groundwork to use the rental income it received to reinvest in additional properties and continue the refurbishment cycle. As of 2024, Groundwork has now refurbished an additional 11 properties.

An existential threat. The 16 properties that Groundwork originally brought back into use between 2012 and 2015 under the EHCGP are now seeing their leases come to an end and are being handed back to their original owners. The financial impact of this on Groundwork, along with the chronic lack of central government funding for community organisations to tackle empty homes, is making Groundwork's business model increasingly unsustainable. Groundwork is going to decide shortly whether they can secure investment from other sources or if they will have to continue to gradually reduce their portfolio of properties over the next decade, and perhaps eventually cease running an empty homes programme altogether.

The solution? Simple. Government must provide the funding for social landlords and community-based organisations, such as Groundwork, to begin a new round of action to address empty homes. But this time, with a strong focus on delivering social rent homes through acquisition and conversion. Not only does acquisition and conversion deliver permanent solutions, but it also ensures the long-term sustainability of community-based organisations like Groundwork. When they reinvest rental income in future new empty home initiatives, these organisations can continue supporting our local communities.

⁵³ Scottish Empty Homes Partnership. 2020. [Empty Homes Value Tool](#).

⁵⁴ Ibid.

⁵⁵ Alex Diner. 2023. [The community right to buy: how housing acquisitions can regenerate left behind communities, improve standards, and decarbonise homes](#). New Economics Foundation.



4

Legal and tax changes to maximise acquisition rates

To convert enough empty homes into the social rent homes we desperately need, long-term empty homeowners will have to start selling up. The next government must be bold on this issue. It's in the public interest to drive as many LEHs into social rent conversion as possible. It's time government put some teeth behind bringing empty homes back into use, specifically as social rent homes. National government should implement the following 'pull' and 'push' policy changes:

Pull factors

The open-market sale of an LEH to a social landlord's empty homes team can be a very **attractive offer for empty homeowners**. For instance, councils are trusted and efficient buyers without a mortgage chain and can largely cover legal and administrative costs.

In addition, Shelter has heard anecdotally about how the **positive social impact** of bringing an empty home back into use can often compel empty homeowners to act. As a further incentive, national government should consider exempting the sellers of LEHs from a prescribed proportion of **Capital Gains Tax** if they sell to a local council, housing association, or community group for social rent conversion.⁵⁶ A future Shelter report will also explore changes to the New Homes Bonus to incentivise delivering specifically social rent homes both through new build and acquisition across England.

Push factors

For the 10-City Plan to deliver its potential and provide the crucial short-term stimulus in social rent delivery we need, the guidance and surrounding

legislation for **Compulsory Purchase Orders** must be reformed and made more efficient to enable a wider deployment of CPO powers by local councils.

In a housing emergency, when 300,000 people are homeless, government must use its powers to ensure the efficient and socially beneficial use of our housing stock. Specific recommendations for CPO reform are set out in Annex 2. For cases where CPO is not appropriate or possible, government should also streamline and strengthen EDMOs and Enforced Sale enforcement mechanisms, as recommended by Crisis⁵⁷ and Action on Empty Homes.⁵⁸

56 As is currently the case for registered providers, community organisations should also be exempt from paying Stamp Duty Land Tax under the Finance Act 2003 if they acquire an empty property with the intent to convert it (either by themselves or through a partner) into a social rent home. This exemption should include both open-market acquisition and CPO. See Annex 1 for further information.

57 Crisis. 2023. [Unlocking the potential of England's empty buildings](#).

58 Action on Empty Homes. [What the government needs to do](#).



“Weak CPO powers means our hands are tied locally”

There is significant appetite amongst councils for strengthened CPO powers.⁵⁹ As Cllr Arooj Shah, Leader of Oldham Council, states:

“Oldham is experiencing unprecedented levels of housing need not seen in recent history. Empty homes present a significant opportunity to rapidly deliver social rent homes through acquisition and conversion to help meet this need. And yet, the severe lack of national funding combined with weak CPO powers means our hands are tied locally. With the right central resourcing and reform to CPO, we would be able to expand our use of CPO powers to deliver much needed social rent homes.”

Increases in Council Tax premiums

enabled by the Levelling Up and Regeneration Act 2023 will make holding onto an LEH less financially attractive and disincentivise the creation of new ones too.

These premiums ensure that the owners of long-term empty homes contribute to the local area in which these properties are situated. Evidence shows that increasing the level of Council Tax on empty homes can drive significant reductions in their number.⁶⁰ This churn in the market will provide additional opportunities for local councils, housing associations, and community groups to acquire empty homes for social rent conversion. Through legislative change, for instance secondary legislation under the Levelling Up and Regeneration Act 2023, the next government should:

1) further increase Council Tax premiums for both empty and second home to equal levels

2) reduce the length of time before initial and maximum premiums apply

3) make their maximum application mandatory for local authorities

Appropriate exemptions will be needed for instances where an empty homeowner can prove they continuously make meaningful attempts to sell their empty home but fail due to issues outside their control like their being low local demand for private housing. In these scenarios, owners would benefit from selling to social landlords and community groups who could deliver social rent homes for which there will be high demand. Council Tax reform, as discussed in Box 1 earlier in this report, would also ensure these premiums are applied progressively in a socially just manner.

As Box 7 below discusses, government must also shut down Council Tax loopholes regarding empty and second homes.

⁵⁹ For example, see calls from [Oldham Council](#) and [Brent Council](#).

⁶⁰ IRRV Insight: The Impact of Council Tax Charges on the Numbers of Empty Homes. Accessed here: [The Impact of Council Tax Charges on the Numbers of Empty Homes - Destin Solutions](#)



“Weaknesses in government tax policy and implementation leave the door open for tax avoidance”

BOX 7. Government must shut down Council Tax loopholes

Current weaknesses in government tax policy and implementation leave the door open for owners of low-use housing to avoid enforcement action and paying their fair share in higher Council Tax premiums.⁶¹ If left unaddressed, these issues threaten to undermine the success of the 10-City Plan by 1) reducing the pool of properties available for acquisition, and 2) reducing the Council Tax revenues that could be recycled into empty home acquisition and conversion.

Government must urgently review and address these weaknesses of the taxation system. Specifically:

1. The government definition of the LEH category should be tightened to ensure empty homes that are meaningfully empty but misclassified as second homes are correctly classified. Government should ensure that, like in the case of HMO licensing, the onus is on the owner to provide sufficient evidence that, beyond reasonable doubt, their home is frequently used as a second home.
2. In line with our calls for Council Tax premiums to be raised, it's important that rates are applied equally to both 'empty' and 'second' homes. This will ensure that higher Council Tax premiums cannot be avoided by owners self-reporting their homes as falling into the category with the lower tax rate. A higher rate on both types of low-use property will also help to bring more properties back into use and raise additional funds for local services.
3. Government should review how business rates and relevant tax relief are applied to short-term lets and remove the option for Council Tax premiums to be evaded completely by short-term letting. Short-term lets are damaging local communities and exacerbating the housing emergency.

⁶¹ For instance, we have heard from numerous councils and experts about long-term empty homeowners purposefully misclassifying their properties as 'second homes' to avoid generally higher Council Tax and evade enforcement action.

5. Social homes over empty homes

For all the lives being damaged by the housing emergency; government must work to convert England's empty housing stock into homes again and deliver the new generation of social rent homes that this country desperately needs.

**FIGHT
FOR
HOME**

We need a national suite of mechanisms to urgently ramp up the delivery of social rent homes to 90k per year. This is how we will end the housing emergency. Empty home acquisition and conversion is a fast, cost-effective, and greener way for the next government to quickly increase the delivery of social rent homes early in its term and reduce the number of empty homes.

The more central government puts in to address empty homes, the more social rent homes we will get out. At the least, government should unlock the benefits of the 10-City Plan.

- 1) £1.25bn in central grant funding
- 2) clear direction from national and regional government to prioritise social rent delivery
- 3) sufficient resource for social landlords and community organisations
- 4) legal and tax changes to maximise social rent delivery.

Four simple actions for national government, in cooperation with regional mayors and local councils, to provide thousands of families and households in housing need with a safe, secure place to call home.

We exist to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society.

We do this with campaigns, advice and support – and we never give up. We believe that home is everything.

We would like to give a huge thanks to the following people and organisations – their input, expertise, and support has been invaluable to the creation of this report:

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