Empty Property Strategy 2013-2018

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1 Introduction

Oxford City has a high demand for housing in all tenures, including, student accommodation, second homes, housing for key workers, rented accommodation for those living and working within the City, privately owned and social housing. The demand for housing from a growing population combined with a severely restricted bank of land to develop housing on, has contributed to acute problems of affordability in all tenures, a homelessness crisis and unprecedented demand for affordable rented housing.

Council tax data from February 2013 shows that there are 440 long term empty dwellings (empty for more than 6 months) in Oxford City. Since the introduction of the Empty Property Strategy in 2009 the number of empty dwellings in the City has decreased which in part, is due to the work the Council has undertaken to ensure empty dwellings do not remain so. Table 1. Appendix A provides figures on empty dwellings from 2009 to October 2012.

There are approximately 6000 households on the Council's housing register. The impact of the shortage of housing within the city is not only reflected in the number of households on the Council's housing register but also by those renting or purchasing within the City. On the 21^{st} June 2012 Radio 4 reported on the housing crisis within Oxford City and described it as 'one of the worst outside of London'. The demand for housing has inflated the cost of both renting and purchasing property within the City. Private rents average out at £800, £1200 and £1800 for 2, 3, and 4 bed properties¹. The average house price in Oxford is £376,116², 14 times the median national earnings £26,500³

Apart from contributing to a shortage of housing empty properties can also have a negative impact on a neighbourhood. Empty properties increase the risk of, a fear of crime, vandalism, squatting, vermin infestation and structural damage to an adjoining property. A build up of empty properties in any area can very quickly have a detrimental impact for the aforementioned reasons.

Bringing empty properties back into use can be a cost effective and sustainable way to increase the supply of housing and makes the best use of existing buildings to meet local needs. It can reduce the demand for building new homes, improve neighbourhoods, increase access to housing and help to improve quality of life for those living within the City. The Audit Commissions' publication 'Building Better Lives' identifies the financial advantages of bringing empty homes back into use noting that the cost of bringing 6 empty properties back into use to provide housing for 14 people can cost the same money as building one affordable home for 2 people.

¹ Valuation Office Agency, Summary of monthly private sector rents recorded over the 12 months to the end of December 2011

² Land Registry of England and Wales, Crown copyright. The information above is based on mean figures provided by the Land Registry of England and Wales. Figures for England and Wales are for the period July to September 2012

³ 2012 Annual Survey of Hours and Earnings

2. Aims and Objectives

Aim of the empty property strategy is to,

Introduce a range of measures that will,

- Prevent empty properties from becoming long term empty
- Bring empty properties back into use
- Encourage and support affordable housing and sustainable development
- Improve the environment

Objective of the strategy is to,

- 1. raise public awareness of empty properties through the Council's website, promotions and articles.
- 2. maintain records on empty properties in Oxford City and monitor trends.
- 3. provide positive support to owners and people within the community affected by empty properties
- 4. be proactive through enforcement action where owners are unable to, or will not, bring a property back into use.
- 5. develop effective working relationships between internal departments in order to be proactive through enforcement.
- 6. develop effective working relationships with the private sector and representative bodies such as registered social landlords, housing associations, housing cooperatives, Police and Fire Service.
- 7. be aware of, and enable the potential to maximise the use of an empty property, including commercial and land through development where appropriate.
- 8. help identify wider implications of empty properties in Oxford City and carry out relevant research.
- 9. ensure that targets set by Oxford City Council are met.

3. National and Local Context

National

Housing Strategy for England

Laying the Foundations: A Housing Strategy for England was published in 2011 and sets out the Governments Strategy for Empty Homes.

- awarding the New Homes Bonus to empty homes brought back into use
- providing information and practical advice to local authorities and communities to help them address empty homes
- investing £100 million funding to bring problematic empty homes back into use and announcing £50 million of further funding to tackle some of the worst concentrations of empty homes
- consulting on options to levy an 'empty homes premium' on the Council Tax payable
- proposing changes to Empty Dwelling Management Orders to target their use on the very worst long-term empty homes causing a nuisance to the community

Council Tax

The Local Government Act 2003 allowed local authorities to change the discount on Council Tax for second homes and empty homes. Oxford City Council charge 100% Council Tax on properties unoccupied for 6 months or more to discourage owners from leaving properties empty. The Council do however recognise that some empty properties require renovation works and time to be sold on the housing market. Certain discounts and exemptions exist for properties being renovated and for properties unoccupied for less than 6 months.

Recent government reforms give billing authorities greater discretion over the reliefs from Council Tax available in respect of some empty properties. Oxford City Council has recently agreed to raising the Council Tax levy on dwellings unoccupied for more than 2 years to 150%.

Homes and Communities Agency (HCA) empty homes fund

Within the 2011-2015 Affordable Homes Programme the government have allocated £100million to tackle long-term empty properties.

Communities and Local Government (CLG)

On the 6 September 2012 the CLG announced £300 million funding as part of the housing and growth package.

Recent national news

Living-over-the-Shop and other conversion initiatives look set to receive a boost via a more relaxed planning regime in the not-too-distant future. Other changes to General Permitted Development Order are also being taken forward separately: making it easier for commercial properties to be converted to residential use; and encouraging the reuse of existing buildings through making changes of use easier.

Oxford context

The Empty Property Strategy is one part of a suite of strategies developed to cover a range of housing priorities within the City which includes,

- Oxford City Council Corporate plan Meeting Housing Need
- Oxford Core Strategy core policy 7- Maintaining a balanced housing supply including the use of windfall sites.
- Housing Strategy 2012-2015
- Affordable Housing Policy
- Homelessness Strategy 2013-18 (to be adopted by April 2013)

4. What is an empty property under this strategy?

The definition of an empty property for the purpose of this strategy is a dwelling that has been unoccupied for more than six months. The target property under this strategy is a privately owned residential dwelling and includes,

- Single-family dwelling houses
- Flats
- Houses used for multiple occupation
- Residential accommodation over/adjoining commercial property

There are instances where a dwelling has been unoccupied for more than six months but which, due to certain circumstances, would be exempt from intervention by the Council under the Housing Act 2004 (empty dwelling management orders). They are listed in Appendix B.

Not all empty property brought to the attention of the Council, fall within the category described above, for example commercial properties, however the Council may make further inquiries to assist in resolving issues of concern or to provide advice on making better use of such a property.

5 Why Oxford City Council targets empty homes.

Public Support

In autumn 2012 an Oxford Talkback (Oxford Citizens Panel) survey was carried out and there were 362 responses. The survey revealed an overwhelming support for the Council's commitment to ensuring empty dwellings are brought back into use. 94% of respondents thought it was important and of those 68% thought it was very important. Similarly 85% said yes to the Council taking formal action to bring a property back into use. When asked about the impact an empty dwelling had on a neighbourhood 76% referred specifically to the issue of unsightliness.

In January 2013 further consultation took place using the Councils online consultation portal 'E consult Empty Property Questionnaire'. There were 27

respondents. Questions asked included, difficulty in finding somewhere to live, whether they knew of an empty dwelling in their area, and whether they considered it important for the Council to intervene to ensure empty dwellings were occupied. In respect of the last question there was overwhelming support, 86% of respondents considered it very important.

Increase Provision of housing

Bringing empty properties back into use can be a cost effective and sustainable way to increase the supply of housing.

Development of windfall sites through empty property work.

In some instances and where appropriate advice is given with regard to the potential to development of the site. This may be by sub-division of a dwelling, development of amenity area or complete demolition and redevelopment of the site.

Impact on neighbourhoods

Empty properties can be a nuisance to those living directly next door and to the neighbourhood. They increase the risk of, anti-social behaviour, vandalism, unsightliness, vandalism, squatting, and vermin infestation and may cause structural damage to an adjoining property. A build up of empty properties in specific areas can damage confidence in an area as a whole and lead to a depressing downward spiral.

Financial Impact

Empty homes can mean a loss in council tax revenue.

In 2011 the New Homes Bonus was introduced. The New Homes Bonus is designed to strengthen the incentive for local authorities to identify empty properties and work with property owners to find innovative solutions that allow these properties to be brought back into use. The New Homes Bonus is drawn from central government funding set aside for this purpose. A bid for the New Homes Bonus is made in October of every year. The Bonus is based on the council tax of additional homes, and those brought back into use, with a premium for affordable homes and are paid for the following six years.

6. Barriers to bringing empty properties back into use.

The main obstacle to reducing the number of empty homes is the complexity of the reasons behind why a property has been left unoccupied. These may involve:

- Inheritance issues/delays with probate
- lack of finance to carry out essential repairs,
- problems with achieving a sale
- perceived problems with letting
- the owner may be in residential care

- the owner may lack the personal ability/skills to deal with the property
- the ownership of the property may be unclear
- unwillingness to bring the property back into use.

Encouraging and facilitating the return to use of an empty property can be a lengthy and time consuming process; there is no single or simple solution to the problem. The provision of financial assistance for repairs may be all that is required in some situations, but some owners also need significant encouragement and support to take positive action.

7. What we can and do to bring empty dwellings back into use.

There are a variety of tools available to the Council to bring empty homes back into use. These range from advice and encouragement and if an owner is unable or unwilling, escalating to enforcement action. Priority in all cases will be given to those properties considered to be in a dangerous state or that are having an adverse impact on the neighbourhood. Appendix E details the process followed when dealing with empty properties and their owners.

Information and Support

The Council provides comprehensive information on,

- selling
- letting
- free pre-planning application advice
- VAT relief
- Council contacts, Home Choice Scheme and landlord Forums
- details of persons interested in purchasing an empty property information on contractors

The Council often receives requests for details of empty homes in the City this is generally from potential purchasers, developers, etc. Unfortunately, under the Data Protection Act we are unable to give out personal details regarding empty properties and ownership. The Council has an Interested Purchasers Database, providing an interface between empty property owners and interested purchasers and developers.

Other sources of information available include the Empty Homes Agency reporting website. This enables members of the public to get local reports on properties reported as empty.

There are numerous sources of information about empty properties that are marketed for sale. There are specialist agencies that sell property in need of renovation. A high proportion of the residential properties sold at auction are empty homes. Further information about sources of information and buying empty homes is available on the Empty Homes Agency website.

The HCA Empty Homes Toolkit also provides information on finding out who owns empty homes

Enforcement

Priorities for Action

Whilst it is important to bring all empty homes back into use, the Council recognises that some homes cause greater concern than others. In order to maximise the effectiveness of limited resources and to protect individual property rights, we must prioritise intervention. The information gathered would allow the Council to take into consideration the location of the home and its effect on the surrounding neighbourhood.

Formal Action

The Council has a number of measures it can use to assist in returning empty homes back into use apart from those described above and includes enforcement. Where the Council considers enforcement action to be appropriate the approach will be fair, equitable and incremental. There is a need to carry out enforcement functions in a consistent, practical and equitable manner, which, in turn, will help to promote a thriving local and national economy. Legislation used is listed in Appendix D

Formal action is considered to be the option of "last resort" some empty homes can become a blight or nuisance to a neighbourhood and can pose a danger to the public health. There is a range of statutory powers available to the Council to deal with specific problems associated with an empty home. Issues such as nuisance, vermin infestation, fly tipping and dangerous or insecure buildings can be addressed by statutory action and this permits the Council to serve notice and carry out works in default and/or to prosecute for non-compliance. Such powers include:

Town and Country Planning Act 1990 (S.215)

A notice can be served on the homeowner where a home is considered to be 'detrimental to the amenities of the neighbourhood'

Building Act 1984 (S. 76-79)

101 Provides powers to tackle 'dangerous and ruinous' structures.

Local Government (Miscellaneous Provisions) Act 1982

Under Section 9, the Council has the power to secure empty homes against access, where there is considered to be a danger to public health.

Environmental Protection Act 1990 (S.79-80)

These powers are used to remedy conditions that are detrimental to health or circumstances that constitute a statutory nuisance.

Housing Act 2004

The Council has the power to remedy property conditions that pose a threat to the health and safety of potential occupiers and visitors.

Recovery of Costs

In most cases, failure by the owner to comply with a notice can lead to the Council arranging for the works to be done in default. If the costs cannot be recovered by billing the owner, a charge is placed on the property. Where large debts occur to the Council and there is no prospect of that debt being recovered, the Council may consider forcing the sale of the home under the Law of Property Act 1925 s-103 Enforced Sale.

Final resort measures

Enforced Sale

This option may be considered for homes where the Council has had to use its enforcement powers (see above) to abate nuisances or to secure a home. The owner must pay charges that are raised against the property by the Council for carrying out the works in default. Such charges can be made against the home and unless the owner pays, the Council can force its sale to recover its costs. With this process, the Council's charge takes precedent over any outstanding loans or debts secured against the home. The owner will receive whatever money is left when the Council and other debtors have recovered their costs, and the owner will also be responsible for their own legal costs. The Council will seek to ensure that the enforced sale of any home leads to its rapid re-occupation or redevelopment and does not perpetuate the misery of empty homes into the future.

Empty Dwelling Management Orders

Empty Dwelling Management Orders (EMDO) are a welcome addition to the powers available to the Council to bring empty homes back into use. EDMO's are a means by which the Council can temporarily take over the management of a home to repair and then let the property. EDMO's may be suitable where, despite the Council's best endeavours, owners have failed to bring a home back into use and it is cost effective to do so. Each case will be considered on its own merits.

Compulsory Purchase Orders

Compulsory Purchase Orders (CPO) can be made under either Section 17 of the Housing Act 1985 s17 or Section 226(1)(a) Town and Country Planning Act 1990 are a means by which the Council can acquire land and buildings for housing purposes. Often the threat of a CPO will be sufficient to persuade an owner to take appropriate action without proceeding to obtain possession. If possession is gained the Council will seek to dispose of properties with safeguards to ensure that they are made habitable and occupied. CPOs are a lengthy legal process that is not to be undertaken lightly but CPOs will be used in appropriate cases where, despite the Council's best endeavours, owners have consistently failed to bring homes back into occupation. As with EDMO's, each case will be considered on its own merits.

8. What we have done and what we have achieved.

Dwellings brought back into use through intervention.

In 2005 the Council appointed an Empty Property Officer and in 2009 the Council's Empty Property Strategy was introduced. Since the appointment of the Empty Property Officer and the introduction of the Councils Empty Property Strategy 2009-2013 the Council has been successful in bringing 84 long term empty dwellings back into use.

Development of windfall sites through empty property work

In addition to empty dwellings being brought back into use a further 14 units of accommodation have been created through the development of 3 empty properties. Recently 2 empty dwellings have been the subject of free preplanning application advice and are likely to be progressed to a full planning application. The first property proposal is for 5 units of accommodation and the second property proposal is for 9 units of accommodation.

Empty Homes Questionnaire

Each year a questionnaire is sent to owners of empty dwellings identified through council tax data. In August 2012 a questionnaire was sent out to 455 owners. A 150 were returned. 101 properties were shown to be unoccupied. Regular monitoring of those properties identified as unoccupied is on-going and those found to be occupied are notified to Council Tax to enable records to be amended accordingly. Table 3 Appendix C details responses to the latest questionnaire.

Using the information provided within the questionnaire, the empty property officer has been able to offer advice on such things as VAT relief, contractor details, and the Councils Home Choice Scheme.

Home Choice Scheme

The Home Choice Scheme is designed to encourage and attract private landlords to rent their properties to people either on our housing register or those that are known to be in housing need. Owners responding to the annual questionnaire who state that they intend to rent are contacted by the empty property officer. Information is provided on the Council's Home Choice Scheme. Recently an owner of three houses agreed to let his properties through the Home Choice Scheme in doing so preventing three families from becoming homeless.

Oxford City Website

The Council's website now includes a page on Empty Homes which provides the facility to report an empty property, advice on the Council's Home Choice Scheme and information on what the Council can do to assist owners and to ensure properties are brought back into use. Since the Empty Homes Page was introduced in May 2011 there have been 5681 users.

Empty Dwelling Management Orders (EDMOs)

Since the introduction of the Empty Property Strategy in 2009 Oxford City Council have applied for 3 EDMO's, one of which was withdrawn following the property being placed on the open market. The remaining 2 applications were granted. All three properties had been unoccupied for more than 5 years and despite at least a year of negotiation with the owners continued to remain unoccupied. All three properties have since been occupied and without the implementation of a full EDMO.

Law and Property Act 1925 s-103. Enforced Sale

In 2009 the Council recognised the potential to use the Law of Property Act in order to recover debts incurred following work in default of a notice being carried out. An Enforced Sale procedure is now in place and has been used with great success and without the necessity to proceed to enforcing the sale of a property. In one instance a sum of £40,000 was recovered.

9. New Developments

Budget for works in default of notices served on empty dwellings

The Council now have a budget of £5000 to support works required following non-compliance with a notice. Works required to be carried out to an empty dwelling are usually in order to, secure a property or to alleviate harm to the locality such as unsightliness.

New Homes Bonus Oxford

When an empty dwelling is identified as being occupied and Council Tax data is amended accordingly the Government match the council tax raised for that empty property and is paid for a period of 6 years.

There are 2 principal ways in which the empty homes are brought back into use for the purpose of the New Homes Bonus, firstly by direct intervention whereby the empty property officer contacts owners and works with them to bring the property back into use and secondly, by carrying out a survey of owners of alleged empty properties. A questionnaire is sent to owners of empty properties and specifically asks if the property is occupied or not. If a property is acknowledged to be occupied Council Tax records are updated to reflect this. Table 2 Appendix C details how much New Home Bonus is being received and projected to be received over six years.

Empty Commercial Property

It is intended to extend surveys of empty dwellings to that of empty commercial properties. There are three potential benefits,

• to identify those commercial properties that are unoccupied, and following discussions with planning and agreed appropriateness, provide advice to

owners in respect of the potential to apply for change of use from commercial to residential.

- to identify and forward on information to revenues on those properties found to be occupied.
- to enable the provision of additional housing within the city.

10. The Future

The Council will continually review best practice throughout the UK and to develop the approach set out in this strategy. There are no direct revenue consequences in broadly meeting the aims of the strategy but full implementation will depend on additional resources being made available in support of detailed surveys of empty properties and formal action taken.

The option of utilising the Councils Compulsory Purchase Powers under the Housing Act 1985 s17 to support the Empty Property Strategy will be the subject of a report to CEB. This will develop in more detail the timescales and costs. Where a property has been identified as being suitable in terms of applying for a Compulsory Purchase Order a separate report will be submitted to CEB.

Further investigation will take place into the possibility of developing opportunities to bring empty space back into use as dwellings e.g. space over shops and non-viable commercial premises.

It is intended that the strategy will be active, growing and evolving as further work to tackle the issue of empty property and land takes place. There will be continuous monitoring of the strategy to assess whether amendments and additional resources may be required. An action plan is listed at Appendix F

Appendix A

Table No. 1 Council Tax list of Empty Properties and Second Homes from April 2009 to October 2012

	April 1st 2009	Oct 24th 2009	Jan 23rd 2010	Mar 27th 2010	Apr 17th 2010	Mar 31st 2011	Aug 25th 2012	Oct 6th 2012	Feb 23rd 2013
Second Homes	1,088	1,173	1,056	940	954	879	1,312	1,192	875
Long Term Empties (over 6mths	717	657	633	661	643	586	451	455	440
Short Term Empty (internal use only)	915	843	820	759	828	783	806	826	710
Total Empty Homes (b plus c)	1,632	1,500	1,453	1,420	1,471	1,369	1,257	1,281	1,129
No. of properties	57,638	57,771	57,849	57,882	57,980	58,568	58,874	59,040	59,123
* Total Empties + Second Homes	1805	1,830	1,689	1,601	1,597	1465	1,763	1,647	1,315
Total Empties as % of total properties	2.83%	2.60%	2.51%	2.45%	2.54%	2.34%	2.14%	2.17%	1.91%
72	Sources:	Council Tax	reports ct6140	b/d					

*Second homes, whilst technically excluded in terms of the definition of an empty dwelling, do impact on the long term housing provision and are therefore worthy of note. Whilst some of the properties listed as second homes by Council Tax are occupied at fairly regular intervals there are some which remain unoccupied. These properties continue to be anomaly whilst they are listed as a second home and only come to the attention of the empty property officer if they become unsightly and/or a nuisance.

Appendix B Prescribed Exceptions

Empty Dwelling Management Orders do not apply to:

- Any property empty for less than six months (but in practice most cases will involve properties empty for several years).
- A person's only or main home if they are:
 - temporarily living elsewhere (e.g. working away from home);
 - being cared for or caring for someone away from home.
- Second homes and holiday homes.
- Properties that are in the process of being sold or let.
- Properties that are going through probate or where probate was obtained within the previous six months.
- Usually occupied by an employee of the relevant proprietor in connection

with the performance of his duties.

- For occupation by a minister of religion as a residence from which to perform his duties.
- The property frozen subject to a court order
- The property is subject of criminal proceedings
- Mortgagee has entered into and is in possession of the dwelling

Appendix C

Table No. 2 Amount of New Homes Bonus being received and projected six year balance, as a result empty property initiative.

Year	Empty Dwellings	Empty Dwellings now occupied	Total empty homes brought back into use x £1439.33*	Six year total value £	Total value minus 20%
2010	610				
2011	465	145	208,702.85	1,252,217.10	1,001,773.68
2012	417	58	69,087.84	414,527.04	331,621.56

Council tax for a dwelling in band D (3 bed-semi detached) = $1439.33 \times 6(yrs) = 8636.98$.To date there have been 200 empty dwellings brought back into use. Using band D as an average, revenue gained is $8636.98 \times 200 = \pounds1727396$.

*average yearly council tax figure (Band D) is used. 20% of this value goes to Oxfordshire County Council.

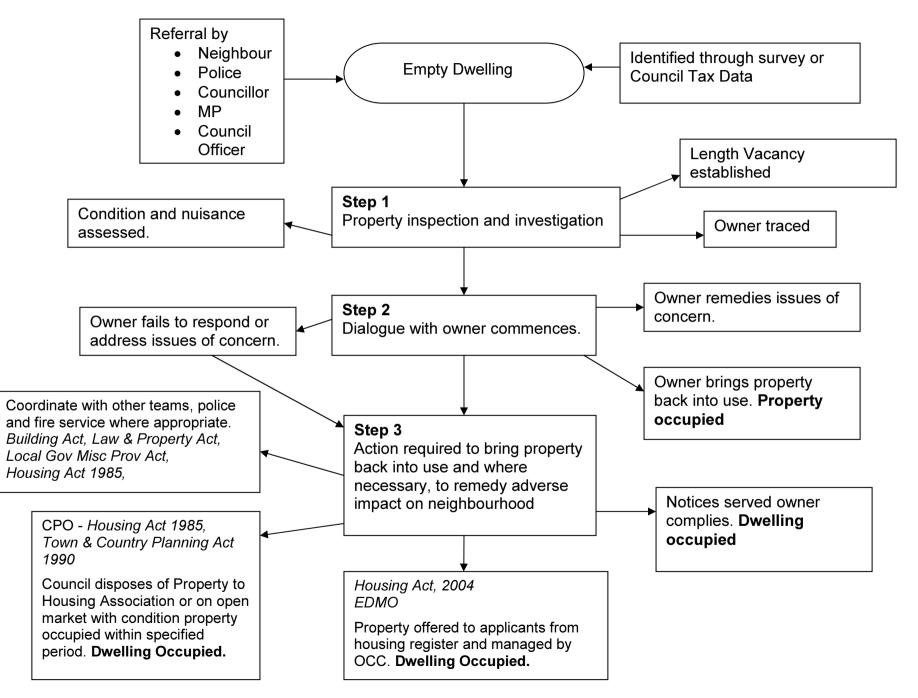
Table 3. Results of Questionnaire sent out in August 2012

Occupancy status			
	Occupied		
	Unoccupied	101	
Unoccupied Dwelling	Туре		
	Flat	29	
	Terraced	26	
	Semi	25	
	Detached	9	
No. Bedrooms			
	4		
	3 26		
	2 19		
	1 18		
	Not 13		
	specified		
Reasons given for en	npty status &	intentions for the	ne
property.			
	Being renova	53	
	To be sold	23	
	To be let	6	
	Site redevelo	5	
	Financial res	3	

Appendix D Legislative Framework

Building Act 1984 Clean Neighbourhoods and Environment Act 2005 **Environmental Protection Act 1990** Housing Act 2004, Empty Dwelling Management Orders/Housing Health and Safety Rating System. Section 17 Housing Act 1985 Compulsory Purchase Orders Section 226(1)(a) Town and Country Planning Act 1990 Land Compensation Act 1973 Compulsory Purchase Section 103 Law and Property Act 1925 Enforced Sale Local Govt and Housing Act 1989 Local Govt' (Miscellaneous Provisions) Act 1976 Local Govt' (Miscellaneous Provisions) Act 1982 Prevention of Damage by Pests Act 1949 Public Health Acts 1936 and 1961 **Regulation of Investigatory Powers Act 2000** Section 215 Town and Country Planning Act 1990. Land adversely affecting amenity.

Flow chart detailing processes used to bring an empty property back into use.



GOAL	ACTION REQUIRED	TIMESCALE	RESPONSIBILITY
Maintain and develop the Empty Homes Database to increase functionality and reporting facilities	Council Tax to provide data 6 monthly on all empty properties vacant for over 6 months	Achieve a year on year reduction in the number of empty homes due to implementation of the Empty Homes Strategy. Numbers currently stand at 455	Empty property Officer Community Housing and Council Tax
Raise public awareness of the Council's commitment to ensure Empty Dwellings in the City are brought back into use including publicising the Empty Property Strategy	Liasing with Policy, Culture and Communications to highlight empty homes issues through local media. Use of OCC web page for empty properties.	During National Empty Homes week. In response to national news reports/announcements	Empty Property Officer Community Housing and Communications Team Leader, Policy, Culture and Communication
Loan Facilities to financially assist owners to bring their empty property back into use. Affordable Housing Loans	Investigate, • potential provision of loans • terms and conditions loans would be granted • Implementation of a policy	April 2013	Empty Property Officer Community Housing. Environmental Development
Flexible empty home loans.	for the provision loans to bring empty homes back into use		
Interested purchasers database	Develop a database Developers, members of the public, Registered Social Landlords who are interested purchasing Empty Property	On going	Empty property Officer
Proactive enforcement against the target group to ensure an efficient and coordinated approach when dealing with unoccupied and nuisance properties.	Have regular empty property working groups to highlight empty property work and making decisions to take formal action	Three monthly and as and when required.	CaNACT, Environmental Control, Building Control, City Development, Legal Police, Fire Service
Compulsory Purchase Housing Act 1985	Introduction of city wide policy to compulsory purchase empty dwellings	April 2013	Head of Housing and Corporate Assets
Empty Space and Empty Commercial site to assist in the development of housing provision in the City	Surveys of, accommodation above shops and under used or vacant commercial property.	On going	Empty Property Officer Community Housing, City Development, Council Tax Manager and Head of Finance.

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