

4. Written Responses – Questions

The Government’s Proposal

1) Do you agree, in principle, that vacant non-household properties should be charged for water, sewerage and drainage services?

Yes No

RICS cannot see the benefit in charging for services that are not used.

This proposal could harm the commercial sector in Scotland as landlords look to fill vacant properties, at under market-value rent, to ensure they do not have to pay for services they do not use, nor invoke 90% EPR after three months.

Furthermore, this consultation proposes that no distinction should be made in the charging regime to recognise the cause or nature of the vacant status; for example, there is no difference between properties undergoing a refurbishment and those simply without a tenant - RICS believes this is a missed opportunity. If charges could be evaded by refurbishment, that could encourage landlords to enhance an empty property.

This consultation does make provisions for compliance or enforcement i.e. checking the supply has been sufficiently ‘cut off’.

2) Do you agree that water and sewerage charges for vacant properties should be the same as those for occupied properties regardless of the reason for the vacant status?

Yes No

See above

Charges – Drainage Services

3) Do you agree that drainage charges should be the same as those for occupied properties?

Yes No

Drainage is imperative to a building – whether it is in use or vacant. As such, we would consider charging for drainage as necessary, to an extent; but vacant and occupied properties should be charged at different rates.

Timetable for introduction

4) Do you agree that the current exemption should be removed from 1 April 2017?

Yes No

We disagree that the current exemption should be removed from 1 April 2017 as we do not believe that the exemption should be removed.

However, should this proposal go ahead, 18 months should be a reasonable lead-in time, if sufficient notification is provided.