

Person ID	ID	Question 5.4 - Do you have any views on our preferred approach for promoting the re-use of empty homes and buildings to provide for additional housing within the Plan period? Do you support (please select one option):	Question 5.4a - If you answered Other, give details here:	Question 5.4b - Please explain why you have chosen this option:	Question 5.4c - Do you think we should include (please select one option):	Question 5.4d - Please state what the annual empty homes allowance should be and why?	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1247176	LPIO-23180	0		We most definitely agree that all long-term empty properties should be brought back into use, by compulsory purchase if necessary.								
1248326	LPIO-23220	0		instead of building new houses there are many houses and buildings that are currently unoccupied that would be more than suitable housing , there are enough spaces for everyone in this world .								
1237870	LPIO-2327	Option 3		There should be no long-term empty housing n Wirral. Compulsory Purchase could be used if the owners are reluctant to bring these houses back into use.								
1247177	LPIO-23325	0		We most definitely agree that all long-term empty properties should be brought back into use, by compulsory purchase if necessary.								
1247178	LPIO-23326	0		We most definitely agree that all long-term empty properties should be brought back into use, by compulsory purchase if necessary.								
1247179	LPIO-23327	0		We most definitely agree that all long-term empty properties should be brought back into use, by compulsory purchase if necessary.								
1248345	LPIO-23509	0		I agree with Wirral council's plan to work with private landlords to convert more empty properties into homes. Wirral has some of the finest historic buildings, such as Hamilton Square, and it would be tragic to lose these historic properties by allowing buildings to become derelict by neglect and lack of investment. If I had to chose between Hamilton Square and Shanghai-there would be no hesitation...the quick build tower blocks have a very short life span compared to the traditionally built brick.								
1241770	LPIO-23644	0		The rate of empty homes being brought back into the market needs to be accelerated and increased, not reduced as the local plan suggests. This could be done by issuing compulsory purchase orders or applying punitive council tax rates.								
1248420	LPIO-23730	0		The Council refuses to accept its historical rate of empty home conversions of 250 per annum. A figure of only 90 is used, undermining their own argument of regenerating the deprived areas. There are some 4,000 to 6,000 empty homes in the Borough.								
1239377	LPIO-23731	0		There currently stands, some 4-6000 empty homes in Wirral which should be prime candidates for regeneration.								
1248091	LPIO-23810	0		The Council refuses to accept its historical rate of empty home conversions of 250 per annum. A figure of only 90 is used, undermining their own argument of regenerating the deprived areas. There are some 4,000 to 6,000 empty homes in the Borough.								
1248448	LPIO-23852	0		We fully support the Council in their strategies to bring empty homes into use, but for this local plan it is necessary to have clear evidence that these strategies will result in a net increase in dwellings. Whilst empty homes returned to use each year has been from around 150 to 250 per annum since 2011, Council tax records shows that between 2011 and 2019, there was a minor increase in the number of empty homes in Wirral. In 2011, there were 2,609 empty homes whereas in 2019 (the latest statistics), there were 2,620. This shows that despite the empty homes brought back into use, it is clear that others are falling into the Long-term Empty category. This is not addressed in the evidence base in HP3.1 or HP3.2. Therefore based on past trends the allowance for 1,350 should not be relied upon and should be discounted.			https://wirral-consult.objective.co.uk/file/5656108	https://wirral-consult.objective.co.uk/file/5656110				
1242185	LPIO-23919	0		We welcome the inclusion of an allowance for the return of empty homes but query why only 90 dwellings per annum, when a figure of 238 dwellings has been successfully achieved in 2016/17 and 2017/18, as shown in Table 5.2. This success ought to be better celebrated and we see no reason why this past trend would change. In fact, with emerging powers for Council's to acquire finance to deliver homes, more action may occur over the next 15 years to boost the supply of housing. Therefore, we encourage an increase in this figure from 1,350 to 3,450 dwellings over the plan period. This would also reduce the case for 'exceptional circumstances' and save our greenfields from having to be allocated for development.			https://wirral-consult.objective.co.uk/file/5659121	https://wirral-consult.objective.co.uk/file/5684263	https://wirral-consult.objective.co.uk/file/5657006			

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1248490	LPIO-24094	0		Commends the Council's aspirations of returning empty homes to the market but a separate allowance should not be made for this source of supply outwith the general windfall allowance included in the Local Plan housing trajectory. The figure being included in the Council's housing trajectory is unjustified and unrealistic. There will always be empty properties in any housing market and an aspiration to reduce this significantly is commendable but not realistic or deliverable for the reasons set out in our attachment.			https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684866	https://wirral-consult.objective.co.uk/file/5684853
1248466	LPIO-24275	0		We fully support the Council in their strategies to bring empty homes into use, but for this local plan it is necessary to have clear evidence that these strategies will result in a net increase in dwellings. Whilst empty homes returned to use each year has been from around 150 to 250 per annum since 2011, Council tax records shows that between 2011 and 2019, there was a minor increase in the number of empty homes in the Wirral. In 2011, there were 2,609 empty homes whereas in 2019 (the latest statistics), there were 2,620. This shows that despite the empty homes brought back into use, it is clear that others are falling into the Long-term Empty category. This is not addressed in the evidence base in HP3.1 or HP3.2. Therefore based on past trends the allowance for 1,350 should not be relied upon and should be discounted.			https://wirral-consult.objective.co.uk/file/5674415	https://wirral-consult.objective.co.uk/file/5674416	https://wirral-consult.objective.co.uk/file/5685040	https://wirral-consult.objective.co.uk/file/5674418	https://wirral-consult.objective.co.uk/file/5674417	
1244826	LPIO-2435	0		I most definitely agree that all empty properties should be brought back into use, by compulsory purchase if necessary.	a Higher numbers of empty homes in the housing land supply	I most definitely agree that all empty properties should be brought back into use, by compulsory purchase if necessary.						
1248557 Environment Agency	LPIO-24452	0		Not specifically although we would point out empty houses are often of an older stock and therefore less environmentally efficient while some could be located in areas at risk of flooding. All of this should be addressed prior to occupancy to improve the sustainability of that housing asset.								
1245996	LPIO-24583	0		We support the Council in their strategies to bring empty homes into use, but for this local plan it is necessary to have clear evidence that these strategies will result in a net increase in dwellings. Whilst empty homes returned to use each year has been from around 150 to 250 per annum since 2011, Council tax records shows that between 2011 and 2019, there was a minor increase in the number of empty homes in the Wirral. In 2011, there were 2,609 empty homes whereas in 2019 (the latest statistics), there were 2,620. This shows that despite the empty homes brought back into use, it is clear that others are falling into the Long-term Empty category. This is not addressed in the evidence base in HP3.1 or HP3.2. Therefore based on past trends the allowance for 1,350 should not be relied upon and should be discounted.			https://wirral-consult.objective.co.uk/file/5681950					
1242697	LPIO-24692	0		Wirral has made good progress, with an average of 125 pa in 10 years (Empty Homes Task 1 Report). However, the Council has failed to fully work up a successor programme or allow for the gap between the so-called household need and the existing stock. Government statistics show the dwelling stock was 148,340 in 2018 and 4,955 were vacant (at early October 2018). The 2014 household projections give 145,400 households and the 2016 projections give 143,010. The gap is then nearly 3,000 to 5,300, depending on the projection used and the empty stock is above the English average (in percentage terms). The attached documents provide more detail on how many dwellings could be recovered if the Council vigorously pursued empty stock, at least down to the English average. The Long-Term Vacant (LTVs) dwellings runs from 2,940 & 2,980 in 2009 & 2010 down to 2,097 in 2018. If the percentage of LTVs is to be lowered to the English average (of 0.89%), then Wirral could bring over 770pa back into use. Given the success of Wirral, at 125 pa and the full potential of up to 770 pa (only to reach the English average), the 3 options seem to limit future targets & work and understate future success. Empty Homes Task 2 Report estimates that an allowance for empty homes to be added to the future supply is 189.5 pa (1,895 in 10 years). The stepped approach seems unnecessarily pessimistic. Given the past success, the target should be 125 pa, not 90.			https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121		

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1248749	LPIO-24887	Other (please state)		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5684847	https://wirral-consult.objective.co.uk/file/5684848	https://wirral-consult.objective.co.uk/file/5684845			
1248769	LPIO-25007	Other (please state)		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5659045	https://wirral-consult.objective.co.uk/file/5684957	https://wirral-consult.objective.co.uk/file/5659039	https://wirral-consult.objective.co.uk/file/5659038	https://wirral-consult.objective.co.uk/file/5684956	
1248823	LPIO-25111	0		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5674317	https://wirral-consult.objective.co.uk/file/5684865	https://wirral-consult.objective.co.uk/file/5684849			
1248832	LPIO-25221	0		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5684857	https://wirral-consult.objective.co.uk/file/5659562				
1248833	LPIO-25325	0		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5661125	https://wirral-consult.objective.co.uk/file/5661100	https://wirral-consult.objective.co.uk/file/5661124	https://wirral-consult.objective.co.uk/file/5661129		
1248956	LPIO-25393	0		Do not consider that the evidence justifies the inclusion of 1,350 units within the supply. We do not consider that a separate allowance should be made for this source of supply outside the general windfall allowance included in the Local Plan housing trajectory. The figure being pursued by the Council is unjustified and unrealistic. There will always be empty properties in any housing market and an aspiration to reduce this significantly is commendable but not realistic or deliverable. Over the last 10 years, the number of long term empty homes reduced by 844, compared with 1,588 long term homes brought back into use, which reflects the fact that as certain types of empty homes are brought back into use others that were previously occupied will become empty. This is a natural cycle of the housing market. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included in the Council's housing trajectory going forward. The Council's suggested figures of 100 brought back into use in years 1-5, then 90 in years 6-10 and 80 in years 11-15, does not reflect the 84 homes per year reduction achieved over that last decade. If the Council's trajectory was correct, the Borough would have an empty home ratio of just 0.5% by the end of the plan period. This compares to a 0.9% average across the UK. The Council have provided no compelling evidence to indicate how they would get from a current ratio of 1.4% down to 0.5%. Ultimately, we are of the view that the Council would be able to achieve a ratio of 0.9% like the national average and that this would only result in 500 empty homes coming back into use over the plan period.			https://wirral-consult.objective.co.uk/file/5677474	https://wirral-consult.objective.co.uk/file/5684859				
1248986	LPIO-25535	0		We would generally expect the re-use of empty homes to be included in the windfall allowance, to prevent double counting of 'new' homes. It is usually expected that no windfall allowance is put forward in the first 3 years of a housing supply trajectory to again avoid double counting. A revised windfall trajectory should be proposed and consulted on before the Draft Local Plan is prepared.			https://wirral-consult.objective.co.uk/file/5662723	https://wirral-consult.objective.co.uk/file/5662725	https://wirral-consult.objective.co.uk/file/5662770			

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1249015	LPIO-25591	0		The Council's suggested figures of 100 brought back into use in years 1-5, then 90 in years 6-10 and 80 in years 11-15, does not reflect the 84 homes per year reduction achieved over that last decade. If the Council's trajectory was correct, the Borough would have an empty home ratio of just 0.5% by the end of the plan period. This compares to a 0.9% average across the UK. The Council have provided no compelling evidence to indicate how they would get from a current ratio of 1.4% down to 0.5%. Ultimately, we are of the view that the Council would be able to achieve a ratio of 0.9% like the national average and that this would only result in 500 empty homes coming back into use over the plan period.			https://wirral-consult.objective.co.uk/file/5684897					
1246458	LPIO-25756	0		I most definitely agree that all empty properties should be brought back into use, by compulsory purchase if necessary.								
1246459	LPIO-25757	0		I most definitely agree that all empty properties should be brought back into use, by compulsory purchase if necessary.								
1249070	LPIO-25759	0		Do not consider that the evidence justifies the inclusion of 1,350 units within the supply. We do not consider that a separate allowance should be made for this source of supply outside the general windfall allowance included in the Local Plan housing trajectory. The figure being pursued by the Council is unjustified and unrealistic. There will always be empty properties in any housing market and an aspiration to reduce this significantly is commendable but not realistic or deliverable. Over the last 10 years, the number of long term empty homes reduced by 844, compared with 1,588 long term homes brought back into use, which reflects the fact that as certain types of empty homes are brought back into use others that were previously occupied will become empty. This is a natural cycle of the housing market. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included in the Council's housing trajectory going forward. The Council's suggested figures of 100 brought back into use in years 1-5, then 90 in years 6-10 and 80 in years 11-15, does not reflect the 84 homes per year reduction achieved over that last decade. If the Council's trajectory was correct, the Borough would have an empty home ratio of just 0.5% by the end of the plan period. This compares to a 0.9% average across the UK. The Council have provided no compelling evidence to indicate how they would get from a current ratio of 1.4% down to 0.5%. Ultimately, we are of the view that the Council would be able to achieve a ratio of 0.9% like the national average and that this would only result in 500 empty homes coming back into use over the plan period.			https://wirral-consult.objective.co.uk/file/5684896	https://wirral-consult.objective.co.uk/file/5679650				
1243721	LPIO-2596	Option 2										
1249100	LPIO-25963 1 of 3	0		Do not consider that the evidence justifies the inclusion of 1,350 units within the supply. We do not consider that a separate allowance should be made for this source of supply outside the general windfall allowance included in the Local Plan housing trajectory. The figure being pursued by the Council is unjustified and unrealistic. There will always be empty properties in any housing market and an aspiration to reduce this significantly is commendable but not realistic or deliverable.			https://wirral-consult.objective.co.uk/file/5677510	https://wirral-consult.objective.co.uk/file/5684895	https://wirral-consult.objective.co.uk/file/5677508	https://wirral-consult.objective.co.uk/file/5677511	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5677516
1249100	LPIO-25963 2 of 3	0		Over the last 10 years, the number of long term empty homes reduced by 844, compared with 1,588 long term homes brought back into use, which reflects the fact that as certain types of empty homes are brought back into use others that were previously occupied will become empty. This is a natural cycle of the housing market. We consider that a total windfall allowance (including new-build windfalls, conversions and changes of use and empty homes) of no more than 10% of the annual requirement should be included in the Council's housing trajectory going forward. The Council's suggested figures of 100 brought back into use in years 1-5, then 90 in years 6-10 and 80 in years 11-15, does not reflect the 84 homes per year reduction achieved over that last decade.			https://wirral-consult.objective.co.uk/file/5677514	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5684898	https://wirral-consult.objective.co.uk/file/5684949	https://wirral-consult.objective.co.uk/file/5677509	https://wirral-consult.objective.co.uk/file/5684951

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1249100	LPIO-25963 3 of 3	0		If the Council's trajectory was correct, the Borough would have an empty home ratio of just 0.5% by the end of the plan period. This compares to a 0.9% average across the UK. The Council have provided no compelling evidence to indicate how they would get from a current ratio of 1.4% down to 0.5%. Ultimately, we are of the view that the Council would be able to achieve a ratio of 0.9% like the national average and that this would only result in 500 empty homes coming back into use over the plan period.			https://wirral-consult.objective.co.uk/file/5677507					
1249269	LPIO-26162	0		Support the need to return empty properties back into homes but, as indicated in our attachment, this source of supply is not realistic or deliverable and should not be applied outside a general allowance for windfalls in the Local Plan housing trajectory.			https://wirral-consult.objective.co.uk/file/5675699					
1249782	LPIO-26434 1 of 2	0		The Council's current preferred approach is to allow for 1,350 additional empty homes being brought back into reuse over the plan period. Whilst this is a commendable aspiration and very much in line with the brownfield first approach, we are concerned that this figure is not realistic. With the best willpower in the world, it is notable that there is an ever revolving cycle in empty housing which undermines this aspiration i.e. as empty properties become re-used, previously occupied properties become empty. In relation to the most recent 10-year period, as demonstrated in Table 5.3 of the Issues and Options Consultation report, the Council have achieved a reduction of 844 long term empty homes between 2009 and 2018. This compares to 1,588 long term homes being brought back into use over the same period, which reflects the fact that as certain types of empty homes are brought back into use other that were previously occupied will become empty. This is a natural cycle of the housing market.			https://wirral-consult.objective.co.uk/file/5683892					
1249782	LPIO-26434 2 of 2	0		Furthermore, the Council's suggested figures at 100 empty homes being brought back into use in years 1-5, then 90 in years 6-10 and 80 in years 11-15 does not respect the previous average of 84 homes per year reduction over that last decade. Moreover, if the Council trajectory was correct, it would mean that the Borough would have an empty home ratio of just 0.5% by the end of the plan period. This compares to a 0.9% average across the UK. In short, there is no compelling evidence to justify the optimistic figures in relation to empty homes. There is no compelling evidence to indicate how the Council would get from a current ratio of 1.4% down to 0.5%. Until this evidence is provided, we are of the view that the position on the number of empty homes that can be brought back into re-use is overly optimistic. This in turn further constrains the need to release suitable Green Belt sites to contribute towards the overall supply of housing.								
1249219	LPIO-26477	0		We most definitely agree that all long-term empty properties should be brought back into use, by compulsory purchase if necessary.			https://wirral-consult.objective.co.uk/file/5677529	https://wirral-consult.objective.co.uk/file/5677528				
1249812	LPIO-26554 1 of 2	0		There is no evidence to support the figure of 1,350 empty homes being brought back into use across the plan period. The SHMA estimates that there are 507 surplus empty homes, ie the difference between the national average of vacant homes and the number of vacant homes in Wirral. Whilst reducing the stock of empty homes by 507 is reasonable, there is no evidence and no reasonable case to assume a further 950 will not be empty by 2035. There are always vacant homes to enable the flow of people moving homes, and if/when equilibrium is achieved after five years, it cannot be assumed there'd be further reduction. The Council's Empty Homes Report provides a high level overview of bringing empty homes back into use. However, the report relies heavily on case studies from authorities across the UK, given the differing scales, demographic makeup and population differences, it is difficult to see how comparisons including Birmingham can influence the Wirral Local Plan. Indeed, the report itself acknowledges that going forward; There may be potential impacts from any future changes in national policy, the overall policy landscape and market conditions which may have the potential to significantly impact on the number of long term empty homes. Consequently, predicting future supply can be difficult. And that: 'There is a need to have evidence of a realistic and deliverable supply for the future.'			https://wirral-consult.objective.co.uk/file/5684813	https://wirral-consult.objective.co.uk/file/5684811	https://wirral-consult.objective.co.uk/file/5684812			

