

Wirral Council
Empty Homes
Task 1 Report

Issue | 9 January 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Appendices

Appendix A

Empty Property Contribution to the Local Plan

Appendix B

Development Options Review 2018 Consultation Responses

1 Overview

1.1.1 Ove Arup and Partners (Arup) has been appointed to provide planning policy support for Wirral Council (herein referred to as ‘the Council’) in relation to their Regulation 18 consultation. This report sets out the Council’s position and current approach towards addressing empty homes.

1.1 Report Structure

1.1.2 To explore empty homes within Wirral, this paper comprises of 8 sections reviewing the Council’s current extent of and approach to empty homes within the context of Wirral’s housing trajectory;

- Section 2 – introduces the topic of empty homes and their current extent within Wirral.
- Section 3 – reviews the ‘Empty Property Contribution to the Local Plan’ paper (Appendix A), exploring in more detail the scope of empty homes within Wirral.
- Section 4 – explores the Council’s current approach to empty homes including empty homes premium, empty property grants and the strategic plan outlined in the Council’s housing strategy.
- Section 5 – reviews the 2017 SHLAA methodology and consultation responses from the 2016 Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA) consultation and the 2018 Development Options Review consultation.
- Section 6 – analyses the Council’s housing trajectory.
- Section 7 – analyses the Council’s current windfall approach.
- Section 8 – examines surrounding local authorities approaches to managing empty homes and recognising the local conditions resulting in empty homes.

1.2 Key Findings

- 1.2.1 Wirral Council have a proactive approach to addressing the number of empty homes within the Borough. Initiatives currently include Long Term Empty Homes Premium, empty property grants and appropriate assistance to support empty property owners via various schemes outlined in their corporate Housing Strategy. These initiatives have achieved a continued and sustained decrease in empty home numbers, with over 250 homes brought back into active use each year through the Council's intervention.
- 1.2.2 There is support within previous consultations to focus on bringing empty homes back into use and including them within the Council's housing supply or within their windfall allowance. Currently, empty homes are not included within the housing trajectory, which will be the topic of Task 2 within this workstream.

1.3 Next Steps

- 1.3.1 Greater clarity is needed on the current role of empty homes within the Council's housing supply and windfall allowances.
- 1.3.2 There is believed to be scope for the inclusion of long term empty homes as part of the housing supply numbers through the Council's windfall allowance. Task 2 of this workstream will explore the potential for this in greater detail and identify local authorities where this approach has been successfully taken.

2 Introduction

- 2.1.1 Empty homes are an important and complicated issue both nationally and locally in Wirral. The overall number of empty homes within Wirral in 2018 was 4,955 dwellings with an overall sustained decrease in the number of empty homes since 2004 (Table 1).
- 2.1.2 To achieve this sustained decrease, the Council have a proactive and positive approach to managing empty homes which includes:
- Long Term Empty Homes Premium through Council Tax;
 - The Wirral Council Developers List;
 - Financial assistance with empty property grants;
 - Enforcement;
 - Enforced sale;
 - A range of support and advice measures and linkages with housing options;
 - Property accreditation; and
 - Overall strategic aim through the Wirral Housing Strategy.
- 2.1.3 Wirral Council held three consultations in 2016, 2017 and 2018 relating to development options and housing land supply, receiving numerous responses from people engaging in the Local Plan process. Responses from these consultations have been supportive of the Council's housing initiatives and encourage bringing empty homes back into active use, as well as including them within the Council's housing trajectory to reduce the demand on the Borough's future housing land supply.
- 2.1.4 Empty homes are not currently included within the Council's housing trajectory. Windfall sites are considered within the SHLAA and are subject to annual monitoring. The SHLAA outlines that an allowance for unidentified windfalls will be included within the five-year housing land supply and long-term housing trajectory. This is due to their consistent availability and because they have proven to be a reliable source of supply.
- 2.1.5 Wirral is neighboured by Liverpool, Sefton and Cheshire West and Chester Councils and part of a wider city region including Halton, Knowsley and St Helens Councils. Each Local Authority operates their own strategies to manage empty homes within their areas and

include empty homes numbers as an indicator for monitoring within their local plan. Across the authorities there are a range of initiatives being used to bring empty homes back in to use, including Empty Dwelling Management Orders, grants, Enforcement Sales Procedures and the Liverpool 'Homes for a Pound' scheme. Officers from the authorities meet regularly on a sub-regional basis to share best practise and co-ordinate sub-regional events.

Table 1: Numbers of Empty Homes in Wirral¹

Empty Homes	2004	2008	2012	2016	2018
All Vacant	5,825	6,282	5,871	4,941	4,955
Long Term	3,000	3,212	2,495	2,014	2,097
Local Authority Owned	708	0	0	9	1
Private Registered Provider	308	443	622	444	360
Private Registered Provider Long Term	77	172	448	265	290
Other Public Sector Vacant	7	4	0	0	0

¹Table 615 – Vacant Dwellings by Local Authority District: England, from 2004. Source: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

3 Empty Property Contribution Position Paper Review

3.1 Overview

3.1.1 This section reviews Wirral's Empty Property Contribution to the Local Plan paper, prepared by the Council's housing officers (Appendix A). This is to understand the Council's current position and the extent of empty homes within Wirral, including those properties which are classed as long term empty homes and private sector empty homes.

3.2 Scope of Empty Homes in Wirral

3.2.1 In 2018 the total number and percentage of vacant residential dwellings, as part of Wirral's overall number of residential dwellings, was 3.34%, with 4,955 empty homes (Table 1, Table 2, Table 3 and Table 4). There has been a continual reduction in the number of empty homes, including short and long-term empty homes, in Wirral over the last 10 years, with a decrease of 1,405 dwellings since 2009 (Table 4).

3.2.2 Historically, the number of vacant dwellings was higher but had been reduced by the Housing Market Renewal Initiative and the Estate Reconfiguration demolition programmes from 2003 to 2011. However, the numbers have remained steady over the past eight years (Table 2).

3.2.3 There has been a decrease of 870 empty homes since 2004 (

3.2.4 Table 1). This indicates that while progress has been made to bring back empty homes into active use, there is still a continued source of both long and short term empty homes in Wirral (

3.2.5 Table 1). This trend is in line with the national average, with empty homes falling from 710,935 in 2004 to 634,453 in 2018 across England¹.

Table 2: Empty Homes within Wirral²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
6,360	6,318	5,935	5,871	5,424	5,158	4,989	4,941	4,649	4,955

Table 3: Percentage of Empty Homes as a Proportion of all Dwellings²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
4.39%	4.35%	4.07%	4.03%	3.71%	3.53%	3.40%	3.35%	3.15%	3.34%

Table 4: Total Number of Dwellings within Wirral²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
144,690	145,240	145,690	145,720	145,970	146,270	146,810	147,300	147,630	148,340

Long Term Empty Homes

3.2.6 Long term empty homes have been empty for six months or longer¹. The causes of long term empty homes are complex with a wide variety of potential issues including family concerns, financial problems, damage from previous tenants or unwillingness of the owner to act. There has been progress to reduce the number of long term empty homes within Wirral since 2004, with a decrease of 844 long term empty homes since 2009 (Table 5 and Table 6).

Table 5: Long Term Vacant Dwellings²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2,941	2,982	2,609	2,495	2,219	2,047	2,208	2,014	1,936	2,097

Table 6: Percentage of Long Term Vacancy as a Proportion of all Dwellings²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2.03%	2.05%	1.79%	1.71%	1.52%	1.40%	1.50%	1.37%	1.31%	1.41%

Private Sector Empty Homes

3.2.7 Managing long term empty homes in the private sector can be difficult, due to a lack of control. However, interventions by the Council have proved successful with the proportion of long term empty private sector homes decreasing from 2.40% to 1.67% from 2009 to 2018 and the overall proportion of empty private sector dwellings from 5.20% to 2.95% in 2009 to 2018 (Table 7 and Table 8).

Table 7: Percentage of Empty Private Sector Dwellings²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
5.20%	5.15%	4.82%	4.74%	4.39%	4.17%	4.02%	3.97%	3.72%	3.95%

² Empty Property Contribution to the Local Plan. Pg 1. Appendix A.

Table 8: Percentage of Long Term Empty Private Sector Dwellings²

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2.40%	2.43%	2.12%	2.02%	1.80%	1.65%	1.80%	1.62%	1.55%	1.67%

Empty Homes brought back into use

3.2.8 The number of empty homes brought back into use in 2018/19 was 278, with an overall total of 2,620 homes brought back into residential use since 2010/11 (Table 9). The methods that the Council have used to achieve this positive outcome are outlined in Section 4.

Table 9: Number of Empty Properties Brought back into Use³

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
N/A	270	294	296	300	302	289	308	290	278

3.3 Summary of Findings

3.3.1 Overall, empty homes in Wirral are being actively brought back into use with sustained progress in reducing the overall proportion of empty homes across the borough, including long term and private sector empty homes being brought back into use. Key findings include:

- There has been a continued reduction in the number of total empty homes from 6,360 in 2009 to 4,955 in 2018.
- While the overall numbers of private dwellings within Wirral are increasing, the number of private empty dwellings is showing a sustained decline.
- There has been a constant supply of empty homes being brought back into use following Wirral Council interventions since 2010, of over 250 private sector homes each year, or 291 per annum on average.

³These figures are provided by the Housing Team.

4 Current Approach to Empty Homes within Wirral

4.1 Introduction

4.1.1 This section reviews the Council's current approach and the mechanisms used to bring empty homes back into use. These include:

- Long Term Empty Home Premium;
- Empty Property Grant;
- Developers List;
- Advice and Support;
- Landlord Accreditation, Housing Options and Property Pool Plus;
- Enforcement and Legislation and;
- The Council's Housing Strategy.

4.1.2 Details of these initiatives and their effectiveness in reducing empty homes numbers have been set out below.

4.1.3 It is also important to consider the impacts of any future Government changes for example, fiscal tax changes or mortgage relief, as well as the overall national policy landscape and market, which also has the potential to significantly impact the numbers of empty homes. These elements are outside the Council's control but may impact on their approach and success to bringing empty homes back into use.

4.2 Long Term Empty Premium

4.2.1 Programmes being used to bring back empty homes into use include Long Term Empty Premium (LTEP) through Council Tax legislation. Currently, local authorities can impose an additional premium charge through legislation introduced in 2013, raising to 100% from 50% from April 2019. This premium will rise again for homes which have been vacant for at least 5 years to a 200% premium from April 2020 and a 300% premium for properties which have been empty for at least 10 years from April 2021. This is a financial mechanism to bring back empty properties to active use and requires no planning or housing interventions to be achieved.

4.2.2 Within Wirral, the Empty Property Contribution to the Local Plan Paper outlines that²;

*“The number of properties being charged the LTEP has remained somewhat consistent since 2014 but latest Council Tax records indicate a **reduction from 1st July 2019 to 645 properties** since implementation of the 100% LTEP.*

*This figure represents a decrease of 102 LTEP properties, 13.7%, within a period of 10 months and significantly a **reduction of 54 properties**, 7.7%, since the additional premium was introduced on the 1 April 2019.*

If this trend were to continue across the financial year this would see a potential reduction of over 200 properties long term empty over two years, 28.6% of the total number at 1 April 2019, with properties remaining registered as long term empty over two years reducing to around 500.”

4.3 Empty Property Grant

4.3.1 The Empty Property Grant is an initiative to support private sector property owners of homes which have been vacant for more than six months⁴. This money can be used for structural or improvement works². Once the house is refurbished, the property needs to be occupied for at least the following two years². Grants can be for up to £5,000⁵ if the property is located within a Selective Licensing Area, for which the authority requests nomination rights for one year to support Wirral Council's obligations to Homelessness Reduction, or up to £3,000 in non-Selective Licensing areas. The Council's Housing Options program can support this process.

4.3.2 As outlined within the Empty Property Contribution to the Local Plan Paper, to date 15% of empty homes brought back into use through council intervention have used the grant scheme, with usual timescales for renovating the properties being around six months². Timescales can vary due to potential delays in the refurbishment process². This mechanism has been targeted towards Selective

²Empty Property Contribution to the Local Plan. Pg 2 and Pg 3. Appendix A.

⁴ Empty Property? Don't be left counting the cost! Source: <https://www.wirral.gov.uk/sites/default/files/all/Housing/Empty%20properties%20leaflet.pdf>

⁵ Empty Properties. Source: <https://www.wirral.gov.uk/housing/information-and-advice/empty-properties>

Licensing areas to provide a strategic focus which has proven to provide positive results, with other property owners within these areas coming forward and enquiring about the grant².

4.4 Developers List

- 4.4.1 Wirral Council's 'Developers List' scheme enables empty property owners who are looking to dispose of their property to advertise the availability of their premises for sale to developers who have expressed an interest in being alerted to opportunities to purchase vacant properties in Wirral³. Following an assessment of the property for likely hazards, an invitation is circulated to developers inviting them to attend an open morning to enable them to view the property and consider if they wish to submit a bid to purchase the premises.
- 4.4.2 If developers are interested in acquiring the property they are required to submit an offer within a sealed envelope for the consideration of the property owner within a week of the open morning taking place. If any bids are received from interested parties these are provided to the empty property owner for their consideration. There is no requirement for the property owner to accept an offer if they do not believe the proposals received are suitable.
- 4.4.3 Should the owner receive a submission they would like to discuss further with a developer they have the opportunity to do so or alternatively if they believe an offer to be suitable for their purposes it is suggested they take legal advice to look to progress a sale. The Developers List has been used successfully on numerous occasions by empty property owners to dispose of their premises.

4.5 Advice and support

- 4.5.1 Wirral Council's Housing Standards Team engages with empty property owners in a variety of ways to promote the availability of advice and support to enable the return to use of long term vacant properties. This has included:
- Writing to owners to inform of issues and highlight concerns regarding vacant premises;
 - Production of a bespoke leaflet with advice on the costs incurred in keeping a property empty;

- The support available from the Council;
- Distribution of a survey to gain further insight of issues affecting empty property owners;
- Publicity and drop-in sessions for empty property owners as part of National Empty Homes Week;
- Sub Regional events publicising empty homes work; and
- Proactively engaging with managing agents and estate agents.

4.6 Landlord Accreditation / Housing Options / Property Pool Plus

4.6.1 Through liaison with owners, the Housing Options Team is able to assist those in possession of empty properties which meet accreditation standards, to find tenants for their property and receive support to assist in maintaining tenancies. Accredited properties can also be advertised to thousands of potential tenants through the Council's Property Pool Plus website. Additionally, the Housing Standards Team continue to actively market the benefit of the Landlord Accreditation Scheme to empty property owners to enable the return to use of vacant properties.

4.7 Enforcement and Legislation

4.7.1 A range of legislative powers are available to tackle issues associated with empty properties, should the informal route prove unproductive. The most commonly used powers in Wirral are:

- The Building Act 1984: Sections 77 and 78 powers to deal with dangerous or dilapidated buildings and insecure properties in addition to Section 79 powers to deal with the unsightly appearance of a building;
- The Local Government (Miscellaneous Provisions) Act 1976: Section 29 power to deal with insecure properties;
- Public Health Act 1961: Section 17 powers to deal with defective drains;
- Prevention of Damage by Pests Act 1974: Section 4 power to deal with vermin and harbourage;
- The Town and Country Planning Act 1990: Section 215 powers to deal with the condition of a building affecting the amenity of the neighbourhood; and

- The Housing Act 1985: Section 17 of the Act allows for the Compulsory Purchase of land (including buildings) for housing purposes.

4.7.2 Wirral Council's Enforced Sale Policy enables recovery of outstanding debts owed by owners of long term empty residential properties which have been subject to legislative action and where the Council considers it appropriate to force the sale of the property to recover its costs in undertaking default works and facilitate the property's return to use.

4.8 Wirral Housing Strategy

4.8.1 Reducing the number of empty homes is a core priority within the Wirral Housing Strategy, which provides a strategic objective and direction to managing empty homes within the Borough. The Housing Strategy states that "almost 1,200 empty properties were brought back into use since 2010"⁶. The strategy continues to state that the Council "will work with our partners to target empty property interventions and bring long term empty properties back into use, improve neighbourhoods and the housing offer in Wirral."⁷

4.8.2 To do this, the accompanying action plan sets out that the Council will refresh the empty homes delivery plan and "undertake a survey to identify barriers to preventing long term empty properties being brought back into use and what incentives would encourage owners of empty properties to bring them back into use"⁸. A target was included within the Wirral Plan that "1,250 empty homes are brought back into use by 2020"⁵, which due to be achieved in 2019, ahead of the March 2020 deadline.

4.9 Summary of Findings

4.9.1 Overall, the Council is using multiple initiatives to bring empty homes back into use. These have proven to be successful, as

⁶ The Wirral Plan: A 2020 Vision Wirral's Housing Strategy July 2016. Pg 7. Source: <https://www.wirral.gov.uk/sites/default/files/all/About%20the%20council/Wirral%20Plan/Housing%20Strategy.pdf>

⁷ The Wirral Plan: A 2020 Vision Wirral's Housing Strategy July 2016. Pg 13. Source: <https://www.wirral.gov.uk/sites/default/files/all/About%20the%20council/Wirral%20Plan/Housing%20Strategy.pdf>

⁸ The Wirral Plan: A 2020 Vision Wirral's Housing Strategy July 2016. Pg 20. Source: <https://www.wirral.gov.uk/sites/default/files/all/About%20the%20council/Wirral%20Plan/Housing%20Strategy.pdf>

shown by the continual reduction in empty homes in Wirral as outlined in Section 3. Key findings include;

- Number of properties subject to the Long Term Empty Premium has reduced in 2019 by 102 empty homes since implementation of the legislation in 2014.
- The Empty Property Grant has supported owners of empty homes by providing funding to refurbish long term empty homes, contributing to around 15% of the total number of empty homes brought back into use through Council intervention each year.
- Reducing the number of empty homes is a priority within the Council's Housing Strategy. The Council will have met the goal for bringing 1,250 empty homes into use by 2020 by meeting the target during Q2 of 2019.

5 Housing Methodology Reviews

5.1 Introduction

5.1.1 This section reviews Wirral Council's Strategic Housing Land Availability Assessments (SHLAA), Strategic Housing Needs Assessment (SHMA) and Development Options Review, to establish the current methodology for calculating housing supply numbers. This section also considers the consultation responses which were received to understand the wider opinions and perspectives on the Council's approach.

5.2 Strategic Housing Market Needs Assessment and SHLAA Consultation 2016

5.2.1 The SHLAA is a technical exercise to assess the supply of available land which could be used for future residential development. The assessment provides a high-level assessment of the likely potential suitability, availability, achievability and deliverability of sites to inform the Council's Local Plan. The SHMA is an assessment of the Borough's more detailed market and affordable housing requirements, replacing the figures identified in the Regional Spatial Strategy⁹.

5.2.2 Wirral Council held a public consultation on the Wirral SHMA (May 2016) and the Wirral SHLAA (April 2016) from 10 August 2016 to 23 September 2016¹⁰. The consultation drew 656 comments from 82 respondents. Table 10 summarises the comments received surrounding the theme of empty and vacant homes and outlines support for bringing empty homes back into active use within Wirral.

⁹ Wirral SHLAA Update 2016. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20Planning%20Evidence%20Base%20and%20Research/Wirral%20Documents/Wirral%20Strategic%20Land%20Availability%20Assessment%202016/Wirral%20SHLAA%20Update%202016%20Main%20Report.pdf>

Table 10: Summary of the SHLAA 2016 Consultation Responses¹⁰

ID	Summary of Comments Received
018 427	Further information is required on the assessment of the 'availability' of vacant sites to show they are "otherwise available for new development"
166	More emphasis must be given to bringing empty properties back in use.
352	Share concern that there are insufficient properties available at the appropriate value that can allow the elderly to downsize. Has the increased longevity of the elderly been taken into account? This must have resulted in a growing number of properties that are not yet vacant but soon will be.
495	Less than estimated. Vacant stock could be regenerated rather than demolished.
531	Consider existing empty dwellings. There is a partially completed house next to me that has remained empty for 20 years. More family-sized households could be accommodated if fit older people had smaller houses or bungalows to move in to. Why not do an audit of empty properties, such as flats above shops or businesses, to see if any more empty dwellings can be freed up You could also consider whether businesses could move towards more suitable premises by offering an incentive if it freed up land for houses or flats
576	Use vacant sites that are not designated as Green Belt.

5.3 2017 SHLAA Methodology

5.3.1 The SHLAA, is part of the Council's methodology for determining the Borough's housing land supply. A revised methodology for preparing the Wirral SHLAA was made subject to public consultation in July 2017. The SHLAA methodology consists of five stages as outlined below¹¹:

- Stage 1 – Site/Broad Location Identification
- Stage 2 – Site/Broad Locations Assessment
- Stage 3 – Windfall Assessment
- Stage 4 – Assessment Review

¹⁰ Report of further consultation on Housing Needs and Land Supply 2017. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Report%20of%20Further%20Consultation/Report%20of%20Further%20Consultation%20on%20Housing%20Needs%20and%20Land%20Supply.pdf>

¹¹ Wirral Strategic Housing Land Availability Assessment Proposed Revised Methodology for Public Consultation 2017. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Development%20Options%20Review/Proposed%20Revised%20SHLAA%20Methodology%20July%202017.pdf>

- Stage 5 – Final Evidence Base

5.3.2 The revised methodology for the SHLAA Update 2017 is broadly in line with the revised SHLAA 2014 and preceding SHLAA Update with few amendments¹¹:

Stage 1 – Site/Broad Location identification: A minimum site size threshold was not proposed to be applied in the SHLAA Update 2017 as a previous assessment of sites with extant planning permission for new build housing development at April 2016 demonstrated the significant contribution of small sites to Wirral’s housing land supply.

Stage 2 – Site/Broad Locations Assessment: Although the original scoring system remains broadly unchanged, an additional category (category 4) has been added to allow for greater transparency on the status and reasons for excluding sites from the SHLAA Assessment.

5.3.3 As national policy and guidance has since been amended the 2019 SHLAA will replace the 2017 SHLAA as part of the Regulation 18 consultation for the Local Plan.

5.4 2018 Development Options Review

5.4.1 Building on the previous 2016 and 2017 consultations, Wirral Council consulted on potential development options between the 3rd of September to the 26th of October 2018. The consultation was to inform the emerging Core Strategy Local Plan which included a diverse range of studies, updates, documents and assessments¹²;

- Cabinet Report 27 February 2017
- Cabinet Report 23 July 2018
- Playing Pitch Strategy Update November 2017
- Employment Land and Premises Study Update December 2017
- Proposed Employment Allocations
- Proposed Housing Allocations
- Proposed Mixed-Use Allocations

¹² Report of Consultation on Development Options 2019. Pg 3 – 4. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Development%20Options%20Review/Report%20of%20Consultation/Report%20of%20Consultation%20on%20Development%20Options%20-%20New.pdf>

- Initial Review of the Green Belt Revised Methodology
- Initial Green Belt Review Background Report
- Summary of Initial Green Belt Assessment
- Proposed Green Belt Sites for Further Investigation
- Proposed Green Belt Boundary Corrections

5.4.2 The consultation received 3,221 responses from 2,989 individual respondents⁹. These responses also highlight support for bringing empty homes back into active use within Wirral. The responses can be found in Appendix A.

5.5 Summary of Findings

- 5.5.1 The 2017 SHLAA methodology was reviewed to establish the current methodology for determining the Borough's housing supply. The 2018 development options consultation responses and the 2016 SHMA and 2017 SHLAA consultation responses were also analysed to understand the communities' views on empty homes within the housing supply.
- 5.5.2 There is strong support for empty homes to be brought back into active use within the consultation responses from in 2016 and 2018.

6 Housing Trajectory

6.1 Introduction

6.1.1 This section reviews how empty homes currently contribute to Wirral's current housing trajectory.

6.2 2018 Housing Trajectory

6.2.1 The Council's 2018 monitoring report provides the most up to date housing trajectory information. The total dwelling stock is 148,340 dwellings with 3.1% being vacant (Table 11). 86% of empty homes were within the private sector¹³. The report states that within the monitoring year 2017/18, 290 empty homes were brought back into use with 238 of them being vacant for more than two years¹³.

Table 11: Wirral Dwelling Stock as at April 2018¹³

Dwelling Stock by Sector (number of dwellings)	Total Stock	Vacant	Percentage Vacant
Registered Provider	23,183	664	2.9%
Private Sector	129,357	4,076	3.2%
Totals	148,340 ¹⁴	4,740	3.1%

6.2.2 The Borough's housing land supply comprised of 2,637 units with 13,521 units with outline permission as at March 2018¹³. The Council estimated that there were an additional 4,097 potential units which could be delivered as at April 2018 through the Strategic Housing Land Availability Assessment (Table 12).

¹³Authorities Monitoring Report 2018. Pg 26. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Development%20monitoring/2018/Monitoring%20Report%202017-18.pdf>. Please note – these figures are from the 2017/18 AMR report from the Council Tax Statistical base produced in October 2017.

¹⁴ This figure has been updated to the correct overall total dwelling stock number.

Table 12: Capacity of Additional Housing Land Supply¹⁵

Source of Supply	April 2016	April 2017	April 2018
Category 1 Sites – developable within five years	1,249	825	549
Category 2 Sites – deliverable within ten years	1,443	1,243	847
Category 3 Sites – not currently deliverable	2,959	2,463	2,701
Total	5,651	4,531	4,097

6.2.3 In terms of housing delivery, the Council reported 806 gross completions during the 2017/18 monitoring year, compared to 384 gross completions during the previous year¹³. Residential completions on previously developed land was 83% of the total completions¹³. Overall completions are shown in Table 13. Empty homes were not included within the reported completions.

Table 13: Completed Dwellings in Wirral from 2011/12 to 2017/18¹⁶

Completed Dwellings	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Gross New Build	254	463	420	395	468	261	669
Demolitions	242	355	181	16	52	19	56
Net New Build	12	108	239	379	416	242	613
Gross Conversions	14	177	80	168	94	123	137
Net Conversions	10	144	63	158	82	86	91
Total Gross Additional	268	640	500	563	562	384	806
Total Net Additional	22	252	302	537	498	328	704

¹⁵ Authorities Monitoring Report 2018. Pg 28. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Development%20monitoring/2018/Monitoring%20Report%202017-18.pdf>

¹⁶ Monitoring Report 2018. Pg 29. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Development%20monitoring/2018/Monitoring%20Report%202017-18.pdf>

6.2.4 Empty homes were however considered as part of the Liverpool City Region 2017 SHELMA¹⁷ and as part of Wirral's 2016 SHMA with the report stating that ¹⁸;

"It is also worth recognising that were the Council able to robustly demonstrate that the proportion of vacant homes was going to fall by the end of the plan period as a result of programmes designed to bring empty homes back into use, then this could potentially justify a lower figure at the bottom end of the range [regarding predicated dwellings per annum]. However, this is a policy response for the Council to consider in defining their housing requirement, rather than influencing the objectively assessed need for housing in this report."

6.3 Summary of Findings

6.3.1 The 2018 housing trajectory was reviewed to understand the relationship between empty homes and the current housing land supply. Key findings include;

- There were 806 gross completions during the 2017/18 monitoring year, which was an increase of 422 dwellings from the previous year
- Empty homes were considered as part of the Liverpool City Region 2017 SHELMA and as part of the 2016 SHMA but not as part of the Council's evaluation of the ongoing housing land supply.

¹⁷ Liverpool City Region 2017 SHELMA. Source:

<https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/LCR%20Consultations/Draft%20SHELMA%20Summary%20October%202017.pdf>

¹⁸ Wirral SHMA and Housing Needs Study Final Report 2016. Pg 133. Source:

<https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20Planning%20Evidence%20Base%20and%20Research/Wirral%20Documents/Wirral%20SHMA%20Final%20Report%20May%202016.pdf>

7 Windfall Sites Approach

7.1 Introduction

7.1.1 This section reviews the Council's approach to windfall sites.

7.2 2018 Windfall Generation

7.2.1 Empty homes brought back into use are not currently considered within the windfall sites allowance unless they require planning permission for new development as conversions or changes of use. Overall windfall site generation is recorded within the 2018 Authorities Monitoring Report (Table 14).

Table 14: Windfall Site Generation¹⁹

A - Year	B – Base New Build Supply (gross)	C – Gross Completions (including conversions)	D – Draft Year End Residual Supply (B – C)	E – Actual Year End New Build Supply	F – Derived New Build Windfalls (E – D)
2001/2002	2,426	525	1,901	2,289	388
2002/2003	2,289	645	1,644	1,580	-64
2003/2004	1,580	686	894	1,764	870
2004/2005	1,764	531	1,233	2,590	1,357
2005/2006	2,590	511	2,079	3,249	1,170
2006/2007	3,249	736	2,513	3,143	630
2007/2008	3,143	820	2,323	3,244	921
2008/2009	3,244	599	2,645	3,596	951

¹⁹ Authorities Monitoring Report 2018. Pg 52. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Development%20monitoring/2018/Monitoring%20Report%202017-18.pdf>

A - Year	B – Base New Build Supply (gross)	C – Gross Completions (including conversions)	D – Draft Year End Residual Supply (B – C)	E – Actual Year End New Build Supply	F – Derived New Build Windfalls (E – D)
2009/2010	3,596	340	3,256	2,806	-450
2010/2011	2,806	272	2,534	2,474	-60
2011/2012	2,474	268	2,206	2,581	375
2012/2013	2,581	640	1,941	2,532	591
2013/2014	2,532	500	2,032	1,639	-393
2014/2015	1,639	563	1,076	1,636	560
2015/2016	1,636	562	1,074	1,786	712
2016/2017	1,786	384	1,402	2,004	602
2017/2018	2,004	806	1,198	2,018	820

7.2.2 Wirral’s more specific approach is outlined within the 2017 SHLAA methodology. They are considered as part of the SHLAA within Stage 3 ‘Windfall Assessment’. The SHLAA states that “Wirral has a long history of windfall generation”²⁰. With regard to residential conversions and changes of use, the SHLAA states:

“As it is difficult to reliably assess the future delivery of small sites with potential for conversion or a change of use, these sites will again be excluded from the SHLAA Update 2017, in favour of an annual allowance, based on actual recorded rates of delivery; and an updated analysis based on conversions and changes of use

²⁰ Wirral Strategic Housing Land Availability Assessment Proposed Revised Methodology for Public Consultation. Pg 27. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Development%20Options%20Review/Proposed%20Revised%20SHLAA%20Methodology%20July%202017.pdf>

completed between 2003 and 2017 will be prepared for inclusion in the SHLAA Update 2017.”

7.2.3 For other new build windfalls, Wirral has granted permission for 430 dwellings on previously developed land from 2008 to 2016 with an average 54 dwellings per annum¹⁷. Windfalls are currently considered within the five-year housing land supply as well as years 6 – 15¹⁷;

“As windfalls have continued to consistently become available and are still considered to provide a reliable source of supply, it is proposed that an allowance for windfalls will continue to be included within the five-year supply set out in the Council’s monitoring reports.

An allowance for windfalls will now also be included for years 6-15 in the SHLAA Update 2017 and will remain the subject of ongoing monitoring, for inclusion in the Core Strategy Local Plan.”

7.3 Summary of Findings

7.3.1 The Council’s windfall approach was reviewed to establish the current scope of windfalls within Wirral. Key findings include;

- The current approach to windfalls is outlined within the 2017 SHLAA methodology which are considered to provide a reliable source of housing supply and are therefore included within the housing trajectory
- Empty homes were not considered as part of the windfall supply unless they required planning permission for conversion or change of use.

8 Surrounding Local Authorities Approaches to Empty Homes

8.1 Introduction

8.1.1 This section seeks to understand the surrounding local councils' current approaches to managing empty homes and bringing them back into use. This is to acquire a baseline of information across Merseyside. The local authorities surrounding Wirral, including Liverpool, Halton, Sefton, Knowsley and Cheshire West and Chester Councils, were analysed to give baseline information to understand their approaches to empty homes.

8.2 Level of Empty Homes

8.2.1 Liverpool City Council has the largest amount of empty homes across the other local authorities with over 10,000 dwellings currently vacant (Table 15). Sefton possesses a similar number of empty homes to Wirral, at just under 5,000. Furthermore, the boroughs of Halton and Knowsley currently have approximately 2,000 empty homes each (Table 15).

Table 15: Empty Homes in Wirral and the surrounding Local Authorities^{21 22 23}

Council	2016	2017	2018	Overall Dwelling Stock
Cheshire West and Chester	1,756 <i>1.112%</i>	1,749 <i>1.108%</i>	1,630 <i>1.032%</i>	157,920
Halton	1,230 <i>2.120%</i>	1,037 <i>1.787%</i>	1,193 <i>2.056%</i>	58,030
Liverpool	9,535 <i>4.205%</i>	10,512 <i>4.636%</i>	10,353 <i>4.566%</i>	226,750
Knowsley	2,113 <i>3.217%</i>	2,029 <i>3.089%</i>	2,120 <i>3.228%</i>	65,680
Sefton	5,054 <i>3.998%</i>	5,231 <i>4.138%</i>	4,986 <i>3.945%</i>	126,400
Wirral	4,941 <i>3.331%</i>	4,649 <i>3.134%</i>	4,955 <i>3.340%</i>	148,340

8.3 Policy Approaches

8.3.1 The surrounding councils take different approaches to managing empty homes with different policy approaches supported by empty home strategies and schemes (Table 16).

²¹ Table 615 – Vacant Dwellings by Local Authority District: England, from 2004. Source: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

²² Table 100 – Number of Dwellings by Tenure and District: England. Source: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

²³ Percentage vacancy rates are displayed below each year's number of empty homes in italics for comparison purposes.

Table 16: Approaches to Empty Homes in Surrounding Local Authorities

Council	Local Plan Approach	Supporting Strategies
Cheshire West & Chester Council	Policy SOC 1 The re-use of long term empty homes was mentioned as a strategy for delivering affordable housing ²⁴ .	<p>Housing Strategy 2014-2020²⁵ and Empty Homes Strategy 2016 - 2021²⁶</p> <p>Refresh the existing property strategy</p> <p>Establish a service level agreement with the regulatory services team and protocols for the use of Empty Dwelling Management Orders and Compulsory Purchase Orders.</p> <p>Investigate current innovations and good practice for bringing empty homes back into use employed by other local authorities, including purchase or lease and repair schemes.</p> <p>Benchmark performance on tackling empty homes with neighbouring authorities.</p>

²⁴ Cheshire West and Chester Council's Local Plan (Part One). 2015. Source: http://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/adopted_cwac_lp/lp_1_adopted?tab=files

²⁵ Cheshire West and Chester Council's Housing Strategy. 2014 – 2020. Source: http://inside.cheshirewestandchester.gov.uk/policies_plans_and_strategies/housing_strategies_policies_and_research

²⁶ Cheshire West and Chester Council's Empty Homes Strategy. 2016 – 2020. Source: <https://www.cheshirewestandchester.gov.uk/documents/housing/empty-homes-strategy/empty-homes-strategy-2016-2021.pdf>

Council	Local Plan Approach	Supporting Strategies
		<p>Develop a partnership approach to returning empty homes to use for affordable housing in association with Registered Providers and other key stakeholders.</p> <p>Investigate potential to introduce a sub-regional approach to preventing and tackling empty homes through the Cheshire and Warrington Housing Alliance.</p> <p>Empty Homes Strategy 2016-2021</p> <p>Enablement – letter sent to empty home owners asking why the property is empty and provide assistance and technical advice to bring empty home back to standard.</p> <p>Provision of loans and grants to help owners of empty homes to bring their home back into use.</p> <p>Landlord Accreditation Scheme and Empty Homes Matching Service.</p> <p>Enforcement – enforced sale if the owner has a financial debt owed to the Council and it is registered against the property. Compulsory purchase order is also introduced as part of the enforcement policy.</p>

Council	Local Plan Approach	Supporting Strategies
Halton	Empty homes are not considered within the Core Strategy, the borough will be more dependent on delivering housing on remaining greenfield sites at the periphery of the urban area. ²⁷	None
Liverpool	<p>Empty homes are included within business neighbourhood planning text for Hartley's village.</p> <p>Empty homes are also mentioned in the explanatory text within policy H1 'Housing Requirement'.</p> <p>Policy H9 'Vacant Housing, Refurbishment/Extensions and Housing Renewal' supports reducing vacant housing.</p> <p>References to generally vacant or underutilised buildings throughout the plan with support to bring them back into use and redevelop them.²⁸</p>	<p>Housing Strategy 2013 – 2016²⁹</p> <p>Mayoral Priority: 1,000 empty homes brought back into use over the next four years through refurbishment programmes.</p> <p>Empty Homes Strategy 2014 – 2016³⁰</p> <p>Healthy Homes Vacant Dwelling Programme, with the use of available enforcement powers under current legislation such as the Law of Property Act, Empty Dwelling Management Order and Compulsory Purchase order.</p> <p>Partnership working with Registered Providers with the allocation of £1.1 million to bring 105 properties back into use. Sub-regional bid for Clusters of Empty Homes funding, of which £15.3 million is allocated to Liverpool.</p>

²⁷ Halton Core Strategy Local Plan 2013. Source: <https://www3.halton.gov.uk/Pages/planning/policyguidance/planningplans.aspx>

²⁸ Liverpool Local Plan 2013-2033 (Pre-submission draft January 2018). Source: <https://liverpool.gov.uk/media/1356834/01-local-plan-january-2018-final.pdf>

²⁹ Liverpool's Housing Strategy 2013-2016. Source: <https://liverpool.gov.uk/media/9204/housingstrategy20132016.pdf>

³⁰ Liverpool Empty Homes Strategy 2014-2016. Source: <https://liverpool.gov.uk/council/strategies-plans-and-policies/housing/housing-strategy/empty-homes-strategy/>

Council	Local Plan Approach	Supporting Strategies
		<p>Empty Homes Round 2 funding has presented further opportunities.</p> <p>The formation of the Restore Steering Group to deliver the CoEH programme, to further develop sub-regional working and to share best practice.</p> <p>'Ten Point Pledge' aimed at driving up standards in the Private Rented Sector.</p> <p>The 'Homes for a Pound' pilot is providing an opportunity for first time buyers to purchase homes from the council for a pound and to take on the refurbishment of them.</p>
Knowsley	<p>Empty homes are included within the explanatory text within policy CS15 'Delivering Affordable Housing'.³¹</p> <p>Empty homes are also included as targets within CS15 and CS3 'Housing Supply, Delivery and Distribution' policies to decrease number of empty homes and to increase empty homes brought back into use.</p>	<p>Housing Strategy 2016 – 2021 'Building on Success'³²</p> <p>Empty homes programme stated as opportunities for delivery for housing and health.</p> <p>Knowsley Empty Homes Strategy 2016 – 2021³³</p>

³¹ Knowsley Local Plan Core Strategy 2016. Source: <https://localplanmaps.knowsley.gov.uk/documents/knowsley-local-plan-adopted-core-strategy.pdf>

³² Knowsley Housing Strategy 2016-2021. Source: <https://www.knowsley.gov.uk/knowsleycouncil/media/Documents/knowsley-housing-strategy-2016-2021-building-on-success.pdf>

³³ Knowsley Empty Homes Strategy 2016-2021. Source: <https://www.knowsley.gov.uk/knowsleycouncil/media/Documents/empty-homes-strategy-2016-2021.pdf>

Council	Local Plan Approach	Supporting Strategies
		<p>Living Over the Shops Scheme in Prescot – convert disused commercial space in Prescot Town Centre.</p> <p>Empty Dwelling Management Orders – gives the Council the power to improve the standard of a property and identify a tenant.</p> <p>The Empty Homes Programme - 140 empty homes being targeted in the over two to five years empty category. Empty home owners who are not actively trying to bring their property back into use will face enforcement action and this work will be supported by the Council investment of £0.3m which will be used to support engagement and enforcement action as required. With funding to support improvement works.</p>
Sefton	<p>Empty homes are referenced in the context chapter within Homes and Neighbourhoods and Vacant Building Credit within the policy.³⁴</p> <p>Policy HC1 'Affordable and Special Needs Housing' references empty homes and vacant building credit in the supporting text.</p>	<p>Empty Homes Plan 2019 – 2024³⁵</p> <p>Letters & advice to remind owner of their responsibilities whilst properties are empty.</p> <p>Council Tax charges - There is a 100% discount for empty and unfurnished properties for one month. There is a 50% discount up to 1 year for properties undergoing major structural repair or structural</p>

³⁴ Sefton Local Plan 2017. Source: <https://sefton.gov.uk/planning-building-control/planning-policy-including-local-plan-and-neighbourhood-planning/local-plan.aspx>

³⁵ Sefton Council Empty Homes Plan 2019-2024. Source: <https://sefton.gov.uk/media/1536749/Empty-Homes-Plan-2019-24.pdf>

Council	Local Plan Approach	Supporting Strategies
	<p>Vacant Home Rate is an indicator within the Local Plan and will be monitored.</p>	<p>alteration. Properties that have been empty for over 2 years have a 50% premium, meaning a council tax charge of 150%.</p> <p>Property Accreditation - promotes good quality and well managed private rented accommodation within Sefton as a whole. Each accredited property will receive accreditation status for 5 years.</p> <p>Enforcement work – Local Government Miscellaneous Provisions Act 1982, Prevention of Damage by Pests Act 1949, The building Act 1984, Housing Act 2004 and Town & Country Planning Act 1990.</p> <p>Enforced Sales Procedure - The ESP is an existing power using section 103 of the law of Property Act 1925, although primarily designed as a debt recovery process it provides a method for getting long term, problematic properties back into use.</p> <p>Order For Sale - When there are large council tax debts owing on a property, a Charging Order can be placed on the property to secure the council tax debts.</p> <p>Empty Dwelling Management Order (EDMO) - allow local authorities to secure proper management and occupation of privately owned houses that have been empty for two years or more and that have become a blight on the local neighbourhood.</p>

Council	Local Plan Approach	Supporting Strategies
		<p>Compulsory Purchase Order - Providing there is a housing need, Local Authorities have the power to compulsorily acquire buildings and land to provide housing accommodation when owners refused to take action or cannot be traced.</p> <p>Housing Strategy 2016 – 2021 ³⁶</p> <p>Priority Theme: Driving housing quality in communities and neighbourhoods to tackle the number of empty homes in the borough.</p>

³⁶ Sefton Housing Strategy 2016-2021. Source: <https://sefton.gov.uk/media/1039507/Sefton-Housing-Strategy-2016-2021.pdf>

9 Other Local Authorities Approaches

- 9.1.1 Kensington and Chelsea’s Local Plan was considered sound in July 2019 and is expected to be adopted in September 2019 with an allowance of 46 dwellings per year from vacant units returning to use, forming part of the Council’s five-year housing land supply based on London’s 2013 SHLAA (Table 17). This approach was outlined in London’s 2013 SHLAA, supporting the London Plan.
- 9.1.2 The 2013 SHLAA states that “The London Plan aims to reduce the number of long term empty properties down to 1% of the housing stock. Previous SHLAAs have been based on the premise that London will aim to reduce private sector long term vacants to 1% of the private sector stock in each borough over ten years”³⁷ continuing to state that London has an “on-going commitment to bring empty properties back into use.”³⁸

Table 17: Kensington and Chelsea’s approved five-year housing land supply³⁹

Year	Projected Completions	Small Sites Estimate	Vacant Units	Total
2017-18	461	0	46	507
2018-19	389	0	46	435
2019-20	1,083	0	46	1,129
2020-21	1,003	152	46	1,201
2021-22	940	152	46	1,138
Total	3,876	304	230	<u>4,410</u>

- 9.1.3 It should be noted that the next London Plan will not be including empty homes within the housing trajectory;

“For the reasons outlined in the draft methodology, assumptions about the number of vacant homes returning to use will now not be included in the SHLAA study. However, the number of empty homes will continue to be a key Mayoral priority and addressed by policies in the London Plan and Housing Strategy, as well as targeted local interventions, it is recommended that this issue is not

³⁷ The London Strategic Housing Land Availability Assessment. Source: <https://www.london.gov.uk/file/15569/download?token=M9dckY12>. Pg 39

³⁸ The London Strategic Housing Land Availability Assessment. Source: <https://www.london.gov.uk/file/15569/download?token=M9dckY12>. Pg 41

³⁹RBKC Five Year Housing Land Supply and Housing Trajectory Supplementary Statement <https://planningconsult.rbkc.gov.uk/consult.ti/LPPRexam> Pg 11

considered in the next SHLAA or in terms of monitoring forthcoming targets in the next London Plan.”⁴⁰

Inspector’s Comments

9.1.4 The Inspector did not question in written evidence utilising empty homes within the housing supply or question the 46 homes planned to be brought back into use each year. The Inspectors letter supports the Council’s approach, stating that “...The remainder of the supply will largely come from the annual windfall allowances for small sites and vacant units coming back into use...”⁴¹. The inspector continues to agree with the Council’s approach with the inclusion of empty homes being included as part of the five-year housing land supply; “finally the allowances for small sites (152 dpa) and vacant homes brought back into use (46 dpa) are based on reliable SHLAA evidence of consistent historic delivery from these sources which informed the London Plan.”⁴²

9.1.5 The Inspector continues to support the Council’s approach to exempt vacant building credit to support the delivery of affordable housing, no need to incentivise the delivery of housing and no viability concerns within the borough. Similarly, the Inspector supports the Council’s approach and removes the requirement for a 20% buffer by stating that;

“Therefore, whilst the borough has a persistent record of under delivery against its housing targets based on completions from 2010-2017, given the constraints on the borough’s housing supply and without a supply of sites to bring forward from later in the plan period, the application of a 20% buffer would do little to improve the prospects of meeting the borough’s housing requirement more quickly. Rather it would potentially undermine the policies for the protection of commercial, cultural and community uses which are critical to supporting the

⁴⁰ London SHLAA Methodology. Source: https://www.london.gov.uk/sites/default/files/shlaa_methodology_6_feb_2017.pdf. Pg 23

⁴¹ Inspectors Letter. Source: <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan>. Pg 20.

⁴² Inspectors Letter. Source: <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan>. Pg 23.

borough's local communities and the balance of uses in Kensington and Chelsea."⁴³

9.1.6 Additional information can be found regarding these topics within the Inspector's letter.

Precedent

9.1.7 Due to empty homes being included within the 2013 London SHLAA and the London Plan, London authorities include empty homes within their housing supplies. However, a full analysis has not been undertaken for every London authority.

9.1 Summary of Findings

9.1.8 This section has explored the current approaches of surrounding councils to managing empty homes and bringing them back into use. This was done to gain a greater understanding of the surrounding region and explore different strategies utilised by local authorities. These councils are not in comparable markets, therefore progress in reducing empty homes is different across the region due to different market forces. Key findings include;

- A diverse range of mechanisms were utilised by the authorities to manage empty homes which included enforced sales procedures, empty dwelling management orders, enforcement action, funding, grants, vacant dwelling programmes and an empty home matching service
- The majority of Councils had a specific empty homes strategy with empty homes referenced in at least one of their Local Plan policies. This may have involved monitoring the number of empty homes with targets to decrease the amount over the plan period

⁴³ Inspectors Letter. Source: <https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan>. Pg 21.

10 Conclusion

10.1.1 While the number of empty homes within Wirral have tended to fluctuate, there has been a downward trend since 2004. The number of long term empty homes has fallen by almost a third since 2004, an absolute figure of 903 homes.

10.1.2 In order to achieve and maintain this downward trend, Wirral Council have employed various policies, including:

- Long Term Empty Homes Premium through council tax;
- The Wirral Council Developers List;
- Financial assistance with the empty property grants;
- Enforcement;
- Enforced sale;
- A range of support and advice measures and linkages with housing options;
- Property accreditation; and
- Overall strategic aim through the Wirral Housing Strategy.

10.1.3 Following consultations held in 2016, 2017 and 2018 regarding development options and housing land supply, Wirral Council recorded many responses and much support for the reintroduction of empty homes into active use. The reuse of empty homes will reduce demand on the future housing land supply which is something the residents of Wirral were particularly supportive of.

10.1.4 Currently, empty homes are not included in Wirral Council's housing trajectory. Windfall sites are included in the SHLAA, as they are consistently available and are considered to be a reliable source of supply. Due to these reasons, they have been included within the five-year housing land supply and long-term housing delivery.

10.1.5 Local authorities in the wider Mersey area have addressed their empty homes volume separately, monitoring numbers within their respective local plans. Methods used include Empty Dwelling Management Orders, grants, Enforcement Sales Procedures and the 'Homes for a Pound' scheme. Coordination between these authorities has proved successful and officers now meet regularly on a sub-regional basis to share best practice and co-ordinate sub-regional events.

10.1 Key Findings

10.1.6 Wirral Council has a proactive approach to addressing the number of empty homes within the Borough. Initiatives currently include Long Term Empty Homes Premium, empty property grants and appropriate assistance to support empty property owners via various schemes outlined in their housing strategy. These initiatives have achieved a continued and sustained decrease in empty home numbers, with over 250 homes brought back into active use each year through the Council's intervention.

10.1.7 There is support from previous public consultation to focus on bringing empty homes back into use and include them within the Council's housing supply or within their windfall allowance. Currently, empty homes are not included within the housing trajectory, which will be the topic of Task 2 within this workstream.

10.2 Next Steps

10.3.1 At present, there is believed to be scope for the inclusion of long term empty homes as part of the housing supply numbers through the Council's windfall allocations. Task 2 of this workstream will explore the potential for this in greater detail and identify local authorities where this approach has been successfully taken.

Appendix A

Empty Property Contribution to the Local Plan

A1 Empty Property Contribution to the Local Plan

EMPTY PROPERTY CONTRIBUTION TO THE LOCAL PLAN

1 Empty Property Figures Overall and LTE with %

Total number of dwellings ⁽³⁾

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
144,690	145,240	145,690	145,720	145,970	146,270	146,810	147,300	147,630	148,340

All vacant dwellings ⁽¹⁾

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
6,360	6,318	5,935	5,871	5,424	5,158	4,989	4,941	4,649	4,955

Average number of all vacant dwellings for period - **5,460**

% All vacant of total number of dwellings

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
4.39%	4.35%	4.07%	4.03%	3.71%	3.53%	3.40%	3.35%	3.15%	3.34%

Average % all vacant of total number of dwellings - **3.73%**

In Wirral the number of all tenure vacant properties in 2004 was 5,825 and in 2018 there were 4,955, a reduction of 870 (14.9%). The number of long term empty properties in Wirral in 2004 was 3,000 and had reduced to 2,097 by 2018, a decrease of 903 vacant dwellings (30.1%), which is a similar reduction to the current situation both locally and nationally. The issue of empty properties in Wirral is complicated one and is affected by a number of factors including; larger than average pre1919 housing stock, distinct local housing markets, an above average aging resident population, socio-economic impacts, willingness of empty property owners to engage, etc.

All long-term vacant dwellings ⁽²⁾

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2,941	2,982	2,609	2,495	2,219	2,047	2,208	2,014	1,936	2,097

Average number of long-term vacant dwellings for period - **2,355**

% All long-term vacant of total number of dwellings

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2.03%	2.05%	1.79%	1.71%	1.52%	1.40%	1.50%	1.37%	1.31%	1.41%

Average % of long term vacant of total number of dwellings - **1.61%**

Long term vacant's are those properties which have been empty for a period longer than six months. The reasons for a property being long term vacant can be many and varied with reasons such as; abandoned premises, private rented properties subjected to damage by tenants, properties vacated following death of an owner, issues with the granting of probate and a lack of willingness to act in respect of a family residence for example. These are some of the more challenging vacant properties encountered.

Total number of Private Sector dwellings ⁽³⁾

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
122,341	122,700	123,210	123,790	123,610	123,820	124,060	124,440	124,830	125,480

% All vacant of Private Sector dwellings

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
5.20%	5.15%	4.82%	4.74%	4.39%	4.17%	4.02%	3.97%	3.72%	3.95%

Average % all vacant of total number of dwellings - **3.89%**

% All long-term vacant of Private Sector dwellings

2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
2.40%	2.43%	2.12%	2.02%	1.80%	1.65%	1.80%	1.62%	1.55%	1.67%

Average % long term vacant of total number of dwellings - **1.66%**

As the issue of empty properties has become more of a focus at both a national and local level action taken by the council in dealing with vacant premises has necessitated an approach which is both reactive, requiring action to deal with vacant properties highlighted as causing immediate concern by officers / MP's / Councillors / residents / neighbours and external agencies as more vacant properties are reported, and proactive in identifying programmes and schemes which assist owners of long term empty properties return their premises to use. As reporting of empty properties has increased the number and time spent on referrals which ultimately don't turn out to be vacant premises has grown.

2 Numbers of empties brought back into use p.a.

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
	270	294	296	300	302	280	308	290	280

Average number of properties brought back into use each year during the period is 291, this information is monitored on a financial year basis. For a number of years during this time additional legislation / proactive actions have taken place which have contributed toward an improvement in the number of properties brought back into use. Implementation of government legislation for the Council Tax Long Term Empty Premium (LTEP) from 1st April 2013 provided an incentive for owners to return their property to use rather than pay the additional premium whilst their property was vacant. In 2017 a data cleansing exercise of council tax records undertaken by Capita resulted in the occupancy status of property records being updated which had not been previously notified. Actions of colleagues from other Strategic Housing Services such as Housing options also contribute toward the number of properties brought back into use through the assistance they provide in securing tenancies for vacant properties. Occupation of properties subject to LTEP by council tax also supports the outputs for the number of premises returned to use.

3 Yearly Capital Programme spent on empty properties

EP Loan £10k	EP Loan £10k	EP Grant £2k	EP Grant £2k/£3k	EP Grant £3k	EP Grant £3k	EP Grant £3k	EP Grant £3k	EP Grant £3k	EP Grant £3k
2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
£49,884	£58,527	£15,970	£116,086	£172,521	£134,690	£97,211	£141,649	£165,154	£128,356

Average EPG financial year spend since 2012/13 - **£136,524**

Number of properties brought back into use via EP loan / EP grant assistance

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
5	6	8	24	61	51	35	46	56	44

Average number of properties returned to use via EPG since 2012/13 - **45**

Empty properties returned to use via support of Empty Property Grant (EPG) financial assistance make up around 15% of the total number of empties brought back into each year via assistance of Wirral Council. The usual timescale for completion of the EPG process is six months but occasionally additional time is required by applicants due to issues encountered with completion of the refurbishment process which can cause delays and result in the timescale for completion being extended and finalised, this can sometimes extend between financial years. Recently resources have been targeted at increasing volume of applications for assistance from empty property owners in Selective Licensing areas as a strategic focus and this is beginning to show an increase in owners enquiring as to assistance available to return their properties to use.

4 Average house prices for Wirral Council

Mean

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
£158,504	£164,971	£164,108	£159,403	£161,208	£168,490	170,378	186,960	193,570

Median

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
£135,000	£135,000	£138,000	£135,000	£135,500	£140,000	142,000	149,000	152,000

Volume

2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
2,826	2,703	2,942	2,985	3,531	4,549	4,921	4,724	5,583

5 Long Term Empty over 2 Years

01/07/2019	01/04/2019	01/10/2018	01/10/2017	01/11/2016	01/10/2015	01/04/2014
645	699	747	745	722	694	741

Figures are for number of empty properties where Long Term Empty Premium (LTEP) being charged by Council Tax, LTEP legislation became available to LA's to impose additional 50% premium charge from 1st April 2013. Following an amendment to Council Tax legislation in 2018 Wirral Council exercised its discretion to increase the LTEP charged on empty properties from 50% to 100% from 1st April 2019. The 747 properties being charged the LTEP at 1/10/2018 was 36% of the 2,097 properties recorded as long term vacant at that date, these are the empty properties Strategic Housing Services have been tasked with monitoring where action has been taken and properties have been brought back into use through a target included within the Wirral Plan 2019-20 Action Plan.

The number of properties being charged the LTEP has remained somewhat consistent since 2014 but latest council tax records indicate a reduction from 1st July 2019 to 645 properties since implementation of the 100% LTEP. This figure represents a decrease of 102 LTEP properties, 13.7%, within a period of 10 months and significantly a reduction of 54 properties, 7.7%, since the additional premium was introduced on the 1st April 2019. If this trend were to continue across the financial year this would see a potential reduction of over 200 properties long term empty over two years, 28.6% of the total number at 1st April 2019, with properties remaining registered as long term empty over two years reducing to around 500. In order to verify the validity of the change in occupancy status notified, officers from Strategic Housing Services liaise with colleagues in council tax and inspect each property to minimise possibility of council tax fraud and confirm the property's return to use.

Council Tax legislation allows for further increases in the LTEP, from 1st April 2020 a maximum of 200% premium for properties empty for at least 5 years and from 1st April 2021 a maximum of 300% premium for properties empty for at least 10 years, this is likely to have a further impact on owners deciding to return their property to use and result in a further reduction in the number of long term empties.

In summary

There are a range of tools and products/initiatives which the Council is undertaking to reduce the level of empty homes in the borough, Through some of these such as the LTEP it is reducing and making it harder to identify properties and as mentioned above some complaints we get where people think properties are empty are not and that requires a different response in terms of housing standards. The long term vacants are properties which usually require significant resources and time to investigate for ownership or where they are unregistered with Land Registry and are complex in nature. I do not feel that these will be able to deliver any significant input into Local plan projections for the 5 year period apart from and would need to feature more in years 6-15. This leaves a very small residual number of empties to work with. Average empties over a 10 year period run at 1.61% however the last 3 years this has reduced to 1.36% of all empties. Once long term vacants over 2 years are excluded from this overall rate you are then down to 0.97% of the LTV's in the Borough. Considering the net change overall over the last 4 years for the reduction in private LTV which is where you could target the most activity is 0.28% means the numbers to effectively consider

are going down. This is positive for the Council overall as it has been the drive of the Council to reduce empties in the longer term and significant resources have been targeted to help achieve this objective.

I would recommend some further work is undertaken with regards to the above analysis in order to obtain a true robust projection on what levels of empties could be considered as a contribution to the Local Plan and which would stand the scrutiny and objections from developers, landowners and the planning inspectorate.

- (1) Live tables on dwelling stock (including vacants) Table 615 All vacant dwellings by local authority district, England (as at October of each year)
- (2) Live tables on dwelling stock (including vacants) Table 615 All long-term vacant dwellings by local authority district, England (as at October of each year)
- (3) Live tables on dwelling stock (including vacants) Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Appendix B

Development Options Review 2018 Consultation Responses

B1 Development Options Review Consultation Responses

These responses support bringing empty and vacant homes back into use and to include them within the housing supply in the Local Plan⁴⁴;

ID	Consultation Response Excerpt
DOR01012	...Let's regenerate areas such as Birkenhead, Wirral waters, new ferry, let's bring life, business and a hub back to the Wirral in these areas that always used to be the heart of the Wirral. Let's use brown land, waste land, industrial land and empty homes if we need to build. Please do not touch our beautiful green space! ...
DOR01016	...improve governance and management of the hundreds of existing empty homes located throughout the borough to ensure they are occupied; ...
DOR01028	...The development at Wirral Waters, along with Brownfield site availability and the 4000 - 6000 empty units that exist that could be brought back into habitable use will more than suffice the requirement of 7320 units over the 15 year period.
DOR01042	...There are also thousands of Brownfield Sites and approved schemes, 16,000 existing planning consents and up to 6,000 empty houses to be brought back into use, plus opportunities for significant conversions, normal applications and 'Windfall' supply and more...
DOR01045	...Wirral borough has, I gather, one of the highest numbers of empty homes in the country – which need to be brought back into use. I have also learned that there is more land categorized as 'Brownfield' available in the borough than is included on your Council's Register. So it seems that there is no need to review the Wirral Green Belt and the Council should be directing its efforts to bringing underused houses and land back into use....
DOR01056	...The Council should demonstrate that it has fully explored the potential from - Wirral Waters to 2035 - All non-Green Belt sites (urban and brownfield) - Creatively developing plans for reusing existing empty and under-utilised properties...
DOR01057	...There is sufficient land in urban areas, which are already in need of regeneration, (in particular New Ferry) to build upon. Wirral has around 5,000 empty properties and there are brownfield sites which could be used for 12,000 homes. Labour's Shadow Housing Minister has undertaken an analysis of land granted planning permission but where no new homes have been built. North West England and London had the worst difference with only 50% new homes being built...
DOR01062	...Especially, when there are already numerous empty properties in the local area either unsold or not on the market. Incentivising the owners of such properties to free the vacant accommodations will aid in moving the entire housing market on Wirral and freeing affordable housing for first time buyers...

⁴⁴ Development Options Review 2018 Appendix 2. Source: <https://www.wirral.gov.uk/sites/default/files/all/planning%20and%20building/Local%20plans%20and%20planning%20policy/Local%20plans/Core%20strategy%20local%20plan/Development%20Options%20Review/Report%20of%20Consultation/Appendix%202%20DOR01001-DOR02000%20v.2.pdf>

ID	Consultation Response Excerpt
DOR01065	...The utilisation of Wirral's Brownfield Sites MUST be accounted for first within any summary of figures. This, together with nearly 6,000 existing empty properties and Peel Holdings "promise" to continue development in Wallasey and Birkenhead, should supply an ample sufficiency of residential development accompanied by industry. Having examined the future plans for Wirral Waters, it would appear that their projections would totally enhance a very "run down", area of Wirral, complementing...
DOR01073	...Instead of planning on Greenbelt the council should have been planning Wirral Urban regeneration by encouraging the recycling of derelict urban land. Think Eco. Refurbishment of existing empty housing stock and buildings...
DOR01074	...There are approximately 5,000 empty properties on the Wirral... Wirral has brown field sites, proposed developments on dockland and existing empty housing...
DOR01094	...can consideration on empty homes and shops be used across Wirral be an alternative...
DOR01098	...Wirral already has at least 5,000 empty houses - Wirral has ample land in urban areas & brownfield sites to build on...
DOR01100	...There are enough brownfield sites to fulfil our need and this is where development should occur. There is no 'shortage' of band H houses as Cllr George Davies suggests. We need to bring empty properties back in to use. ...
DOR01104	...There are many empty properties unused in the area...
DOR01114	...The key concern is not that houses will be built but where they will be built at the expense of the environment, the nature and the character of The Wirral. Hence, I especially urge the council to vastly reduce any proposal to release greenbelt and to greatly increase the focus on the use of brownfield sites and use of empty houses, plots and large buildings to create homes (houses and flats) ...
DOR01120	Figures released by the ONS, along with the empty homes we have in Wirral clearly demonstrate that there is no need to build on green belt in Wirral, and that includes the plan to build executive homes as part of the councils Hoylake Golf Resort folly
DOR01121	The council must include all brown field land suitable for building dwellings to mitigate the use of green belt land. To this end it is paramount that the whole of the Wirral Waters scheme are included in any targets for housing units along with the existing empty housing stock...
DOR01134	...As Wirral currently has 4,600 empty properties, and the population is decreasing, there is no requirement to build more...
DOR01138	... FOI request by me to you states that in 2017 there were over 4,500 properties, of which almost 2,000 were classified as long term empty. Releasing these dwellings could go a long way towards not needing to use Green belt land and has been identified previously by Wirral Council members as being suitable to meet the entire waiting list for Wirral social housing (acknowledging that the mix may not be entirely suitable) ...
DOR01140	...It was confirmed at the meeting I attended by council officials that there were 4600 empty homes in Wirral. It is unclear how these homes have been factored into the local plan and these should be a primary focus along with development of brown field sites before any consideration of development of green belt should be considered... Affordable housing is required, but should come within the use of empty homes and brownfield development, which is where this would be expected to come from...

ID	Consultation Response Excerpt
DOR01153	...have not factored in here the 6,000 empty properties known to be on the Wirral. In recent years the council has recovered ~300 per annum...
DOR01155	...There are numerous empty houses in the area, there is brown land suitable for building on and finally much of the land around and in Lever Causeway is used for agriculture...
DOR01166	...Why is the council not regenerating areas where houses exist but are empty, a figure that ranges between 4000 and 6000 empty units that could be brought back into habitable use. Is it 4000 or is it 6000, how can the figure vary by 50%?...In addition we are certain that the council has the financial wherewithal to assist in the development of brownfield sites, empty properties and the development at Wirral Waters since it has recently voted to lend £26MILLION to fund the potential Hoylake Golf Resort, something which is still an idea....
DOR01170	...Ensuring that vacant housing stock is brought back into use is another area where the Council needs to be more proactive to ensure that wherever possible these properties are made fit for habitation and included on the overall figures for housing stock. We feel that the council have an obligation to ensure that the use of existing vacant housing stock is maximised and that Brownfield sites are developed to their full potential before considering any building on Green Belt land...
DOR01173	...We do not need 12,000 new ones while 11,000 properties stand empty across this borough. ...
DOR01176	...Housing Needs: The availability of equitable social housing, affordable housing and the need to incentivise property owners to bring empty properties into the habitable market (c.f. penalising them) are important elements of an integrated approach to meet housing needs...
DOR01184	...Brownfield sights could be located and used, maybe some incentive to be given by the Council to help builders clear these sites. Has empty properties been located and included in the report? ...
DOR01204	...I am extremely concerned about the plan to build on Wirral's Green Belt, this will be an ir-reversible tragedy and must not be considered until the Brown field sites and empty properties are utilised....
DOR01206	...Why are you considering building on green belt land when all other areas have not been exhausted ie. Empty housing approx Three thousand six hundred empty properties and Brownfield sites SHOULD be used even if there re extra costs to builders? ...
DOR01227	...Eastham mews a poor development which should not have been allowed. Sadly so much is wrong. Difficult to sell so stand empty I can't sublet...
DOR01234	...There must be lots of land around the borough that can be used before greenbelt. Run down areas could be rejuvenated by knocking down empty properties and building new ones. All the areas around corporation road, by docks it is all empty these areas could be made into nice areas to live...
DOR01254	I don't think you should use greenbelt land. Try to use vacant properties...
DOR01262	...Why aren't the empty properties being taken into consideration? We can't afford to take all our beautiful green spaces...
DOR01266	...The Wirral needs its town centre and surrounding residential areas to be invested in, with houses that the majority of people can afford either to buy or rent not outlandishly priced new developments on greenbelt land with commuting to work only possible by car. Current housing stock should be refurbished and upgraded including any properties currently empty...

ID	Consultation Response Excerpt
DOR01268	...At present everyone I know by-passes Birkenhead Centre and spend their money in Liverpool or Chester. As a matter of urgency this needs to be halted! Otherwise the area will spiral down as Liscard clearly has. I submitted a freedom of information request reference the number of empty houses and to date have not received a reply? Wirral is a desirable place to live and visit, please do not destroy our peninsula!...
DOR01271	...There is a small (3 bedroom) terraced house- 27 Mainwaring Road Seacombe standing empty for years. It has been significantly refurbished, but at the front in very overgrown. Empty property. Can you sort it? ...
DOR01207 6	... I object to the taking of the Green Belt Land between Pensby and Irby, and now that the Peel Group are going to Start building Property on the East Float and the Council to revive empty homes, I see no reason to take so much Green Belt Land...
DOR01278	... There are figures that indicate that there are between 4000/6000 empty homes on the Wirral. What action is the council taking to get landlords & developers to get these all back into occupancy?? ...
DOR01301	Why are we building more houses when there is clearly no need for them and will they just be houses that remain empty? ...
DOR01310	...Also, if 4,000 properties are already lying empty in Wirral – how do you justify the demand for all the entire development?? ...
DOR01314	1. How many empty houses are there on Wirral and what is the councils plan regarding continually uninhabitable houses...
DOR01334	...The Council has not demonstrated that it has planned fully for (i) bringing empty houses back into use and/or the current dwelling stock, (ii) fully securing development on brownfield sites, and (iii) accounting for the full potential of regeneration in the docklands and "Wirral Waters"... Wirral's head of planning has publically referred to 2,634 dwellings with planning permission, 2,400 dwellings possible on brownfield sites, 4,600 empty homes, and 6,450 dwellings/houses committed by Peel Holdings (see annex)... The above latest calculations and the Council's failure to account for empty houses and brownfield sites do not constitute exceptional circumstances... Another issue is the Council's failure to take into account the current number of dwellings (habited and empty). It appears that Wirral has about 3,000 to 5,000 dwellings towards the assessment need (depends on how empty homes and excess dwellings over households are counted). If the Council pursued work on bringing empty homes back into use, gave positive support to developers of brownfield sites, and worked in a pragmatic and positive way with Peel Holdings, then along a 15 year plan, about 16,000 dwellings would be secured...
DOR01337	...From the meeting that I attended in Pensby, I appreciate that vacant properties cannot be included in the new housing figure. However it is surely feasible to use the "Compelling Circumstances" argument to show Government that this is a sensible and proactive method of increasing housing stock. At the meeting in Pensby it was openly stated that there are between 2000 and 6000 empty properties on the Wirral. If Liverpool can release vacant run down properties for £1 then surely Wirral can do the same. If those properties are privately owned, then compulsory purchase them and return them to use, at a profit to the council. The council could employ its own trade people to undertake the work and create revenue...
DOR01338	Firstly, why develop green belt when there are enough brownfield sites or empty properties to use. I believe there is space for 18000 houses on brownfield sites plus 3000 empty houses on the Wirral...
DOR01348	...There are also 6000 empty properties on the Wirral, it is outrageous that the Council is considering releasing invaluable Green Belt Land while these properties lie empty.

ID	Consultation Response Excerpt
DOR01352	...To dismiss the redevelopment of derelict or run down houses and buildings will lead to urban sprawl and undesirable areas. If these are redeveloped it would show better use of council funds and would be more agreeable to Wirral residents. In turn, if decent housing is available in these run down areas, residents are more likely to improve standards of living resulting in increasingly positive contributions to society. I understand that there are around 4000 empty properties in Wirral...
DOR01354	...With the possible development of Brown Field sites (18000) homes and utilising the empty houses on the Wirral (approx 4000) this will adequately cover the inaccurate SHMA figure of 15.000 homes in 15 years...
DOR01356	...When there are already numerous empty homes sitting throughout the Wirral, when there are still ample Brownfield sites available for development, how can anyone possibly think it is a good idea to develop any part of the Green Belt? ...
DOR01361	...Green Belt is a valuable commodity for our heritage and should be used only after all of the Brownfield sites and vacant homes including suitable other have been used...
DOR01372	There are plenty of old empty houses on the Wirral that can be used for this! ...
DOR01374	...There is plenty of brown belt land, look at the docks in Birkenhead, all the land around Birkenhead North station where housing was knocked down. All the empty properties in Birkenhead, Wallasey & surrounding areas...
DOR01383	...Using the empty existing properties should be first. There are many; and landlords with such properties or with planning permissions in place but unused should be fined...
DOR01403	...Whilst it would be preferable to protect all of our Green Belt from development, the revised figure might be justified if all Brownfield sites and empty buildings had been accounted for correctly and utilised and there was still a shortfall against the new figures...
DOR01415	...Empty properties should have CPO's and that would bridge a large gap. ...
DOR01421	...There are tons of old buildings, rows of closed shops with empty flats above and so much wasteland around the whole of the Wirral to develop...
DOR01423	...What possible justification can there be to increase the number of new builds on greenbelt when there are thousands of empty properties on the Wirral, and an abundance of Brownfield available...
DOR01425	...There are hundreds of empty properties across Wirral which just require renovation to be habitable...
DOR01435	...The Council should be following a "Brownfield first" policy and not release any Green belt land until all the Brownfield has been exhausted and the 6000 empty properties on the Wirral have been brought back in to use.
DOR01527	Redeveloped run down areas & empty properties first & foremost. Then use all Brownfield sites. Affordable housing would not be possible on green belt areas.
DOR01533	...There is no excuse for building on greenbelt when so much needs doing to Birkenhead and Wallasey. What is needed is more creative thinking but that takes time and energy and what about houses that are standing empty...
DOR01546	...Wirral housing needs can mostly be met with using brownfield sites. Many sites have not been put into the plan, empty homes to be used and renovated most people want to live in the community they have family in...

ID	Consultation Response Excerpt
DOR01555	...There are significant areas of brownfield land that should be utilised and Peel already have consent for 13,000 houses at Wirral waters, not to mention the existing vacant housing stock...
DOR01561	...You need to look at industry, services, transport also and ensure funding is in place before house building, particularly when there are hundreds of empty neglected properties over in Liverpool in the ownership of the council.
DOR01573	...Read this from Liverpool CC website: "Homes for a Pound is one of a range of measures Liverpool City Council is using to bring a total of 6,000 empty houses back into use. 1,500 properties have already been brought back into use since 2014, and in 2018 we are establishing a new housing company which is set to build or refurbish approximately 10,000 homes over a 10-15 year period." The £1 home scheme has proved to be so popular, it has become oversubscribed. So the desire and ambition to own and improve a derelict property is proven! I believe this is the way forward in Wirral too. Create gated communities while older housing stock is being developed to safeguard the properties and their owners. Make people feel proud of their homes and work with the genuine ones (not people trying to make a fast buck) to revitalise derelict and boarded up properties in Birkenhead....
DOR01583	...There are so many empty homes in Wirral and Liverpool, empty houses on empty streets, warehouses, pubs etc. that can easily be transformed in to affordable housing. Why target green belt land...
DOR01590	...Even so, there are Brownfield sites that can be developed in order to meet housing targets without the need to release Green Belt land. There should be a Brownfield First policy and also a drive to make use of the 6000 empty properties on Wirral...
DOR01607	..There are empty homes and unused brownfield sites all over Wirral which should be used first...
DOR01612	... Use Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes...
DOR01622	...Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes...
DOR01652	...Because this council is inept in its dealings with and managing its current housing stock, bringing empty houses back into use and building on Brownfield sites it now wants to make the panic decision to build on Green Belt which is morally wrong in so many ways!...
DOR01688	...There are 6000 empty homes on the Wirral. They should be brought into use before the green belt is threatened...
DOR01700	...Please look at existing buildings that are empty at present but could be converted...
DOR01722	...The local council have failed to utilise brownfield sites to build affordable houses, and have not done all they can to ensure that empty affordable houses are developed...
DOR01724	...Existing empty housing stick should be converted for these people and Brown sites must be developed for Wirral to improve...
DOR01726	...There are plenty of empty shops and houses that could be renovated and brown belt land that should be developed first...
DOR01734	I am aware that there are considerable brownfield sites available for building on. This coupled with the 6000 empty homes and the available land held by Peel Holdings should negate any need whatsoever for intrusion onto Wirral's Green belt to build homes...
DOR01736	Greenbelt should not be built on when so many brownfield sites and empty properties available across Wirral.
DOR01744	Surely you should be building on brownfield sites first. What about all the empty houses? Green belt should be protected isn't that why we have the town and country planning act.

ID	Consultation Response Excerpt
DOR01745	It saddens me to see empty and derelict buildings, units and houses these should be renovated or restored first before any green belt land is used.
DOR01755	Would it not be pertinent to look at all the brown sites first? Also there are many empty houses on Wirral which could be refurbished or the site they stand on be rebuilt.
DOR01769	If new housing is genuinely needed then the priority should be to restore existing buildings - empty, derelict houses, shops and industrial units and turn them into affordable homes.
DOR01788	...How Many Empty Properties are there on the Wirral? 6000? These sites need to be brought back into use, before attacking Greenbelt is ever considered. ...
DOR01798	...Wirral has 6,000 empty properties. The Wirral has plenty of as yet undeveloped brownfield sites and as we understand it, has 6,000 empty properties. These alone would make up half the proposed number. If the housing needs of Wirral were so desperate then surely these properties would be quick and economic to transform into modern homes without building on greenbelt land. Brownfield sites should always be built on before greenbelt...
DOR01819	...Hence some, if not all of Wirral Waters 13,000 units must be considered. Whilst I can appreciate that the rules by the government are for new builds only, there must surely be a process to consider: - Existing empty houses (6,000)...
DOR01824	...If more houses are needed, then put the funds into existing communities where there are empty houses and rejuvenate them. It seems nonsensical to build on the existing green space on the Wirral, we cannot expand...
DOR01843	...The Council should be following a "Brownfield first" policy and should not release any Green belt land until all the Brownfield has been exhausted and the 6000 empty properties on the Wirral have been brought back in to use...
DOR01844	It is imperative that ALL currently unused and empty properties and brownfield sites are considered for development BEFORE any thought is given to building on the Greenbelt, which is protected for good reasons...
DOR01869	...The Council could be campaigning for housing to be made available via refurbishment and renovation of empty and unused domestic and commercial properties...The Council should be following a "Brownfield first" policy and should not release any Green belt land until all the Brownfield has been exhausted and the 6000 empty properties on the Wirral have been brought back in to use...
DOR01873	Use brownbelt land & existing empty housing as a priority.
DOR01895	...We have enough empty houses, brownfield sites (Peel holdings having been given pp for 1,000's of properties) and Levers being currently up for sale to satisfy the declining population of Wirral...
DOR01897	There are several houses in our area that have been empty for over 12 months can't the owners be encouraged to sell. There are small plots of brown field available as well.
DOR01912	There are plenty of empty houses and brown belt land that should be utilised before using green belt.
DOR01920	...There is sufficient land in urban areas to build upon. Use the Wirral's already empty 5,000 properties and the already existing space on brownfield sites for 18000 homes.
DOR01922	Please use all possible brown belt sites and empty properties...
DOR01922	...Redevelop empty properties and derelict property in other sites or use brown belt.

ID	Consultation Response Excerpt
DOR01942	There is enough empty housing on the Wirral, destroying the green belt when there are empty houses sitting everywhere (why is the council not buying them from the landlords or forcing the landlords to actually rent them instead of keeping them empty? I lived next door to an empty house with no front door on it for 6 months.
DOR01944	...According to Wirral Council there are 1,250 empty homes - let's get those back into use...
DOR01946	It has become clear that there are 3,000 empty properties in Wirral and enough brownfield land to build several thousand new properties, so the easy option of building on greenbelt land is unacceptable and will reflect in local elections in future.
DOR01951	I find it incredible that Wirral's green belt is even up for consideration which makes it very clear that the local council has not really put enough effort into planning and considering how Wirral could in fact be improved by redeveloping some of the areas where derelict properties exist and properties are already empty. The emphasis should be put on brown field sites and regeneration...
DOR01956	...Brown sites must be a priority as well as empty houses that can be renovated...
DOR01971	...There are plenty of brown field sites on the Wirral which should be built on first. Wirral does not have a great homeless community but just needs truly affordable housing to be built. There are a good number of empty houses on the Wirral which should be refurbished for housing.
DOR01974	I believe that Wirral requires more housing and, it requires existing vacant properties to be put to appropriate use whether for housing, commercial benefit or demolished with appropriate properties rebuilt in their place...
DOR01976	Don't use the green belt, do up the empty houses!
DOR01980	I believe that there are a lot of unused premises, empty housing and brown belt land that can be used instead of Greenbelt...