Impact of Housing Restraint Policy 2003-2008 Questions from the inspector with Council responses, via email exchange February 2016

The Inspector has identified one factual matter which he omitted to raise during the hearings, this is the impact on housing delivery in Sefton of the housing restraint policy during the mid 2000s. He understands that the policy framework at the time included the following:

a. UDP policy H1 sought an annual average rate of 350 dwellings per annum (dpa) during 2002-2017 net of miscellaneous demolitions, plus up to 500 dwellings in South Sefton as replacement for Housing Renewal Area demolitions.

b. UDP policy H3 clause 2 stated that when the number of dwellings built over the previous 3 years exceeds the policy H1 requirement by more than 20%, proposals for additional housing would have to satisfy certain "exceptional circumstances" tests.

c. In December 2008 the Regional Strategy relaxed the restraint mechanism of policy H3 by increasing the housing target to 500 dpa and applying it retrospectively from 2003 onwards.

The Inspector has the following questions for the Council:

1. Is his understanding of the policy framework (set out above) correct? If not, please explain.

   Yes, this is correct

2. How many dwellings over the 2003-2008 period were prevented from being developed solely by the restraint mechanism in clause 2 of policy H3? One measure of this might be planning applications for residential development (say 10+ dwellings) which were refused permission by the Council solely under the restraint mechanism of policy H3 and not subsequently allowed at appeal. If the Council monitored the implementation of policy H3 clause 2 in some other way, then that information will be fine – the Inspector is seeking generalised information about the impact of the restraint mechanism.

   This information was never specifically monitored. The success of the restraint policy was monitored purely in terms of number of dwellings completed against the requirement. Mr Young, who was involved in many site specific discussions at the time has advised me that the number of prospective planning applications discouraged would not be insignificant.

3. The Inspector appreciates that planning application data will not address situations in which potential housing developers decided not to apply for permission because they knew the policy H3 restraint mechanism would be invoked. Is the Council aware of

any such situations? If so, a brief comment on the scale of housing development that didn't reach application stage would be helpful.

Anecdotally, Officers at Sefton involved in housing / planning at the time turned away a significant number of enquiries for housing development on urban sites outside of designated 'regeneration areas'. A conservative estimate would be that at least another 100 dwellings per annum could have been delivered over the restraint period, albeit many of these sites subsequently came forward once the restraint was lifted.

4. There is one further factual matter on which the Inspector seeks clarification, concerning the vacancy rate. At the hearings Mr Young stated that the long term trend is a vacancy rate of around 5% because of the impact of the housing renewal programme. However in the UDP (paragraph 6.23) the Inspector notes that vacancies at April 2002 were 3.49% of private sector housing, 3.3% of Council stock and 2.7% of other social housing. Were these figures prepared on the same basis as the figures given at the examination, and if so, would it be reasonable to assume that the overall vacancy rate in 2002 was below 3.5%? In addition, do the 2002 figures pre-date the large scale demolitions of the Housing Market Renewal programme? It would also be helpful to have the vacancy rate recorded at the 2001 Census as a direct comparator with the 2011 Census figure (5.36%) given in evidence.

The ten year average for all vacant homes since 2006 is 5.1%. The fifteen year average is 4.69% - [please see the attached Sefton Vacant Property Timeseries spreadsheet]. These rates were recorded within the various annual housing statistical returns submitted to the DCLG and its predecessors using set monitoring guidelines. The HIP 2002 return (part of the Sefton Housing Strategy Statistical Appendix 2002 - also attached) recorded the total vacancy rate as 3.67% (rounded to 3.7% - Total of Q6 divided by Total Q1*100) as at April 1st 2002.

With regard to the vacancy rates in the Sefton 2006 UDP (para 6.23) the 'Council-owned' and 'other social housing' figures are correct at 3.3% and 2.7% respectively. However, we think that the 'private sector housing stock' vacancy rate should have been 3.8% (rounded) and not 3.49%. It is believed, for unknown reasons, that this was an error in the Sefton Unitary Development Plan. These figures are recorded by the DGLC in the Sefton Housing Strategy Statistical Appendix 2002 table as the second attachment.

It may also be of relevance (and complicate matters) that the Census figures for vacant homes are not measured in the same way as the Housing Strategy Statistical Returns and they are also measured at a different time period.

The Census 2001 measures the total vacancy rate at 3.31% (Census 2001

KS016 Household spaces and accommodation type)

The Census 2011 measures the total vacancy rate at 5.36% (Census 2011 KS401EW - Dwellings, household spaces and accommodation type)

Analysis

The definition of vacant homes has changed over time, as has the reliability of measuring it in Sefton, the latter because we spend a significantly greater staff resource time in monitoring it currently than we did in the past. To complicate matters further, from 2011 onwards the attached time series spreadsheet excludes second homes from the vacant homes calculation.

For clarification HMRI vacant homes demolitions that have taken place are as follows:

Year	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Gross Demolitions	21	59	150	110	194	129	159	59	41	0	141	333	1396

Whilst it may be anecdotal, the analysis of household relocations relating to the Klondyke HMRI area has indicated that 94.5% (397 out of 420 households) of people moved to a new home within the Sefton Borough boundary. This evidence suggests that although vacancies were created to ensure that HMRI housing regeneration initiatives could take place, a number of existing vacant homes, both new build and other properties elsewhere within Sefton, were occupied by those household 'displaced' by the HMRI process. Also we would also suggest caution against any assumption that the uplift in borough vacancy rates during the HMRI period was solely a consequence of this process. Other factors will have played a role too.

In addition, although we have an Empty Homes Strategy in Sefton, there are few enforceable powers to ensure that the number of vacant homes can be controlled. By way of evidence, in 2014 (the last full monitoring year), 48 properties (a gross figure and not net) were brought back into use after action by the Council's Empty Homes Officer. This equates to 0.9% of the total empty properties recorded in 2014.

Furthermore, we understand that government funding to tackle vacant homes will likely continue to be limited. In October 2015 a Parliamentary Question asked whether the Government intended to introduce a scheme similar to the Empty Homes Programme. In response, Brandon Lewis, the Housing and Planning Minister, stated that the Government had no plans to introduce additional funding.

In conclusion, it is clear that making assumptions about future vacant homes levels for local plan purposes is a complicated matter. As a consequence, we consider that NLP's modelling work assuming a vacant and second home rate of 4.6% i.e. 4.3% vacancy plus 0.3% second homes rate (equal the average over the last two years 2012/13 to 2013/14 Council Tax base data), represents a robust and cautious view about future vacancies in Sefton. That noted, a lower vacancy figure than we are assuming might be achieved over the Local Plan period – we are just not confident we can justify such a position.

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	10yr Avge
Total Dwellings	122113	121512	120964	122528	123125	123397	123838	124193	124479	124622	124842	125546	125413	125701	126148	124817.9
Total Vacant Dwellings	4250	4460	3714	5531	6182	6777	7510	7652	6965	6454	5635	5697	5426	5363	5519	6299.8
Proportion of Vacant Dwellings	**3.5**	**3.7**	**3.1**	**4.5**	**5.0**	**5.5**	**6.06**	**6.16**	**5.60**	**5.18**	**4.51**	**4.54**	**4.33**	**4.27**	**4.38**	5.1
Long-Term Vacant Dwellings	1722	1941	2707	2211	2898	2994	2466	2829	3227	2973	3483		3315	2486	3043	2979.6
Proportion of Long-Term Vacant Dwellings	**1.4**	**1.6**	**2.2**	**1.8**	**2.4**	**2.4**	**2.0**	**2.3**	**2.6**	**2.4**	**2.8**		**2.6**	**2.0**	**2.4**	2.4

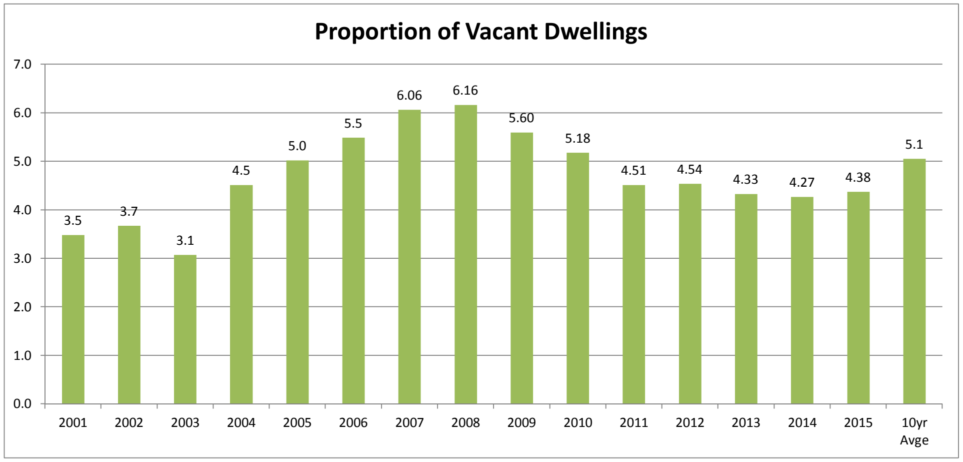
Sources:

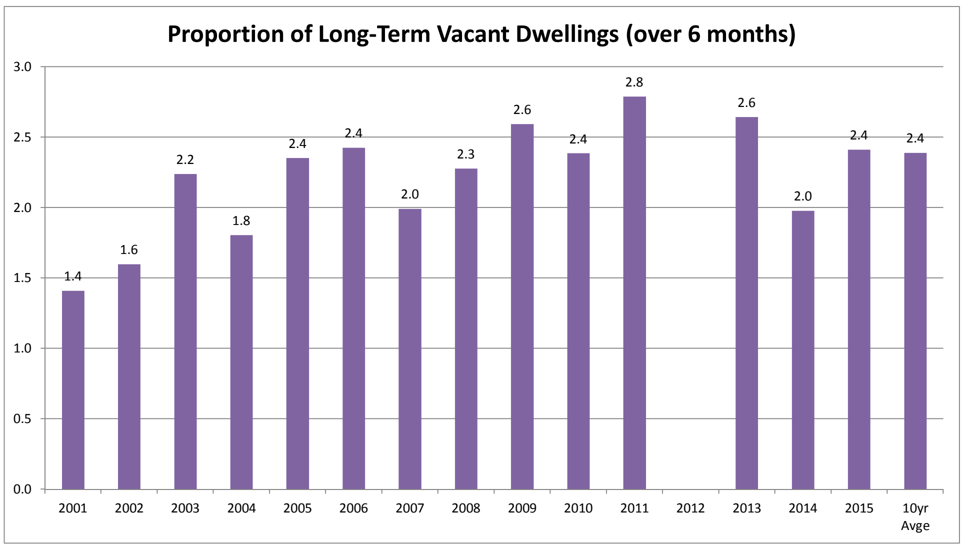
As reported to CLG on HSSA and HIP returns (2001-2010)

2011 onwards from Vacant Dwelling analysis work which excludes second homes from the definition of vacant.

2012 LTV data not yet available.

Please Note: These vacant homes statistics are based on the figures reported to CLG on the Housing Strategy Statistical Appendix (HIP and HSSA) and are base-dated 1st April. Therefore the total vacant dwelling figure will be different to the Council Tax Base vacancy rate collected in October each year.





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Sefton (M4320) **Last Updated by DCLG - 24/10/02 15:43**

HIP 2002: Housing Strategy Statistical Appendix - Read Only Access

- Completed Return held by DCLG

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Section A: Dwelling stock position in authority area at 1st April 2002

	Local Authority	Registered Social Landlord	'Other public' sector	'Other private' sector: Total	'Other private' sector: of which: Owner Occupied*	Total
1. Total dwellings (including non-permanent dwellings)	_13210	__6872	_____0	101430	_91287	121512
2. Number of lone parents under the age of 18 occupying dwellings and units in non self-contained accommodation at 1 April 2002 which have:						
a. on-site support	_____0	_____0				
b. floating support	_____0	_____0				
3. Unfit dwellings	_____4	__149	_____0	_12440	__9488	_12593
4. Difficult to let dwellings	__1029	__1475				
5. Low demand dwellings	___983	___252		__4300	__4000	
6. Vacant dwellings:						
a. Total	___436	___185	_____0	__3839	__3452	__4460
of which:						
1. vacant for more than 6 months				__1941	__1598	

* Note vacant 'other private' sector owner occupied dwellings should include those planned to be occupied or that were previously owner occupied

Section B: Condition of 'other private' sector housing (RSL dwellings should not be included in this section)

Unfitness

1. What is the estimated cost (£ thousand) of making fit the unfit 'other private' sector dwellings in A3d above? ___200

Guidance Notes Form

Section A - Dwelling stock position in authority area at 1st April 2002

For HRA dwellings the definition (of a dwelling) should be the same as on the Housing Subsidy Claims form. For all other tenure, a dwelling is defined as a self-contained unit of accommodation consistent with the definition in the current Census. A dwelling is self-contained where all the rooms (including kitchen, bathroom and toilet) in a households accommodation are behind a door which only that household can use. Non self-contained household spaces at the same address should be counted together as a single unit of accommodation (e.g. bedsits)

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