# WIRRAL LOCAL PLAN 2021 - 2037 SUBMISSION DRAFT



## SITE SELECTION BACKGROUND PAPER

MAY 2022 Version 2





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#### Contents

1. Introduction	1
2. The Wirral Local Plan Preparation Stages	3
3. The Housing and Employment Land Requirements	5
4. The Housing and Employment Site Selection Process and Findings	7

### Page

### 1. Introduction

#### Purpose of this paper

- 1.1 Wirral Council is preparing a new Local Plan which will cover the period 2021 to 2037. The Local Plan will replace the saved policies in the Unitary Development Plan adopted in February 2000. The Local Plan will set out policies and proposals to guide where future development will take place and allocate sufficient land in appropriate locations to meet housing and employment requirements over the Plan period. The Local Plan will also seek to protect the most important characteristics of the Borough, by preserving its unique natural and historical assets from development.
- 1.2 This paper sets out the site selection process that the Council has followed to assess sites for allocation in the new Local Plan to meet Wirral's identified development needs in accordance with the National Planning Policy Framework (NPPF, July 2021) and national Planning Practice Guidance.
- 1.3 The Council has followed a series of defined stages to reach the Submission Draft stage. Each stage of the process is summarised in this paper. The Sustainability Appraisal is an iterative process in the development of the Plan and the different stages of the Sustainability Appraisal are also incorporated into this paper. Cross-references to the Local Plan evidence base are included where these are relevant to the site selection process.
- 1.4 Alongside this background paper the Council has produced a range of supporting documents to accompany and supplement the Wirral Local Plan 2021-2037 which explain and justify the approach to the delivery of planned growth and infrastructure. These include:
  - Housing Delivery Strategy provides further clarification and explanation on all matters relating to the future strategy for the delivery of housing planned as part of the Local Plan up to 2037, and where possible beyond. The document seeks to demonstrate how the key expectations of national planning policy and guidance have been addressed through the production of the Local Plan, with reference to evidence which has been collated to support the production and delivery of the Plan.
  - Infrastructure Delivery Plan identifies infrastructure to support growth from planned development. It identifies the costs of necessary infrastructure for development, how these costs will be met and provides information on how infrastructure will be delivered.
  - Viability Assessment provides an evidence base to assist in identifying the viability impacts of planning policies in the Local Plan, helping to ensure that the policies will not render development unviable and undeliverable.

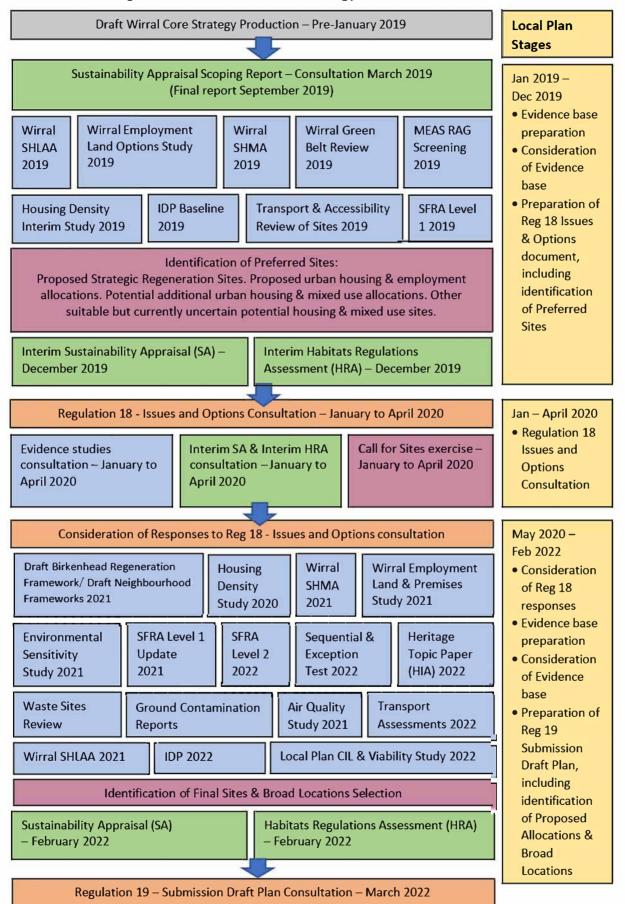
- **Birkenhead 2040 Regeneration Framework** provides a framework for the transformational regeneration of Birkenhead.
- **Birkenhead Housing Market Study** provides supporting evidence to inform and ultimately demonstrate and justify the delivery of proposals in the Local Plan for the regeneration of Birkenhead.
- 1.5 These documents should be read in conjunction with one another and may be updated over time as new evidence and information becomes available. In addition, this background paper should be read alongside the Wirral Local Plan Submission Draft Sustainability Appraisal (2022, SA), Wirral Strategic Housing Land Availability Assessment (2021, SHLAA) and Wirral Employment Land and Premises Study (2021, WELPS).

#### Structure of this paper

- 1.6 This paper is structured as follows:
  - Chapter 2 sets out the Wirral Local Plan preparation stages;
  - Chapter 3 contains an introduction to Wirral's housing and employment land requirements; and
  - Chapter 4 provides a high-level summary of the site selection process followed to identify housing and employment sites for allocation in the Council's Submission Draft Local Plan.

### 2. The Wirral Local Plan Preparation Stages

- 2.1. This chapter sets out the Wirral Local Plan preparation stages.
- 2.2. The Wirral Local Plan has been prepared in accordance with the stages set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. These Regulations prescribe the form and content of plans and the procedure to be followed in their preparation. The Regulations set out the following statutory stages:
  - Regulation 18 Public Participation from Commencement to Proposed Submission
  - Regulation 19 Publication of the Proposed Submission Local Plan (also known as the Submission Draft Plan)
  - Regulation 22 Submission of the Local Plan
  - Regulation 24 Independent Examination of the Local Plan
  - Regulation 25 Publication of the Inspector's Report
  - Regulation 26 Adoption of the Local Plan
- 2.3. The Local Plan has been the subject of a fully integrated Sustainability Appraisal and Strategic Environmental Assessment in line with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004; the Planning and Compulsory Purchase Act 2004; and the National Planning Policy Framework 2021.
- 2.4. The Council commissioned AECOM to undertake the independent Sustainability Appraisal of the Local Plan throughout the key stages of Plan preparation. AECOM has also undertaken an independent Habitats Regulations Assessment of the Local Plan in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).
- 2.5. The Sustainability Appraisal process comprises the following main stages:
  - Stage A: Scoping
  - Stage B: Options development and assessment
  - Stage C: Preparing the Sustainability Appraisal Report
  - Stage D: Consulting on the SA report and the Plan
  - Stage E: Monitoring the significant effects of implementing the Plan
- 2.6. The specific stages of the Wirral Local Plan preparation process including the stages of the Sustainability Appraisal and the Habitats Regulations Assessment are set out below in chronological order with the key evidence that informed the site selection process.



#### Diagram 1 - Wirral Local Plan Chronology and Site Selection Process

### 3. The Housing and Employment Land Requirements

3.1. This chapter contains an introduction to Wirral's housing and employment land requirements to be met in the Wirral Local Plan which sets the context for the site selection process.

#### Wirral's Identified Housing Needs

- 3.2. The Wirral Strategic Housing Market Assessment (SHMA 2019) identified the minimum annual housing need for the Borough for the period 2020-2035 as 783 dwellings each year, a total need of 11,745 dwellings. This equated to approximately 12,000 dwellings plus an allowance for demolitions of 750 dwellings. This figure informed the Council's Regulation 18 Issues and Options document which was published in January 2020 for consultation.
- 3.3. The Wirral SHMA 2019 was updated in 2021 and established the housing need using the standard methodology and 2018 affordability ratios. It identified that the annual housing need for the Borough for the period 2021-2037 is 835 dwellings each year<sup>1</sup>. The total need identified over the Plan period is 13,360 dwellings.
- 3.4. The Local Plan Submission Draft makes provision for the delivery of 17,750 dwellings (gross) over the plan period 2021-2037. This provides sufficient flexibility over and above the housing requirement of 13,360 over the plan period to cater for unexpected change, and to account for any unanticipated failure of sites to deliver at the rate planned.
- 3.5. Further details on the assumptions and approach to identifying housing needs and the supply to meet the needs are set out within the Housing Delivery Strategy<sup>2</sup>.

#### Wirral's Employment Land Requirement

3.6. Following the Issues and Options Regulation 18 consultation, between January – April 2020, the Council commissioned a new Wirral Employment Land and Premises Study (WELPS) to update the 2017 Wirral Employment Land and Premises Study and the 2019 Employment Land Options Study that informed the Issues and Options document. The draft WELPS was published for consultation between February – March 2021. The final WELPS (2021) is now completed and published alongside the Submission Draft Local Plan.

<sup>&</sup>lt;sup>1</sup> SHMA p 120 para 7.4 which includes 779 dwellings per annum based on the Government's standard methodology for calculating housing need, plus an uplift of 6 dwellings per annum to support economic growth and an allowance of 50 dwellings each year to make up for demolitions (totaling 835 dpa). <sup>2</sup> Wirral Local Plan Housing Delivery Strategy.

- 3.7. The 2021 WELPS sets out a demand analysis of the amount of land forecast to be required for B land use classes in the Borough to 2037 and 2040, testing three alternative demand scenarios against the base forecast to understand how different strategy or market influences could alter the balance and quantum of floorspace requirements for the B use classes.
- 3.8. The 2021 WELPS concluded that the 'Economic capacity impact' scenario represents the best estimate of the employment space requirement for Wirral. Based on this scenario, the requirement for additional employment land to 2037 for the Borough is 52.9 hectares. This is broken down as follows:

Change 2020-2037 (B Class Only)	Economic Capacity Impact
Total Land (Ha)	52.9
Office (B1a)	3.7
Other Business Space (B1b/c, B2)	23.0
Warehouse (B8)	26.2

#### Employment Land Requirement by Use Type, 2037<sup>3</sup>

3.9. The WELPS also concludes that given the changes to the use class order, which removed B1 uses in September 2020<sup>4</sup>, the employment land allocation in the Local Plan will only be for B2 and B8 uses and not for previous B1 uses. Furthermore, the WELPS concludes that the office requirement is likely to be met in the existing pipeline developments and therefore, there is no need for further land to be allocated for B1 uses/ offices in the Local Plan.<sup>5</sup>

<sup>&</sup>lt;sup>3</sup> Wirral Employment Land and Property Study, 2021, Table 8.18, Page 117.

<sup>&</sup>lt;sup>4</sup> The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

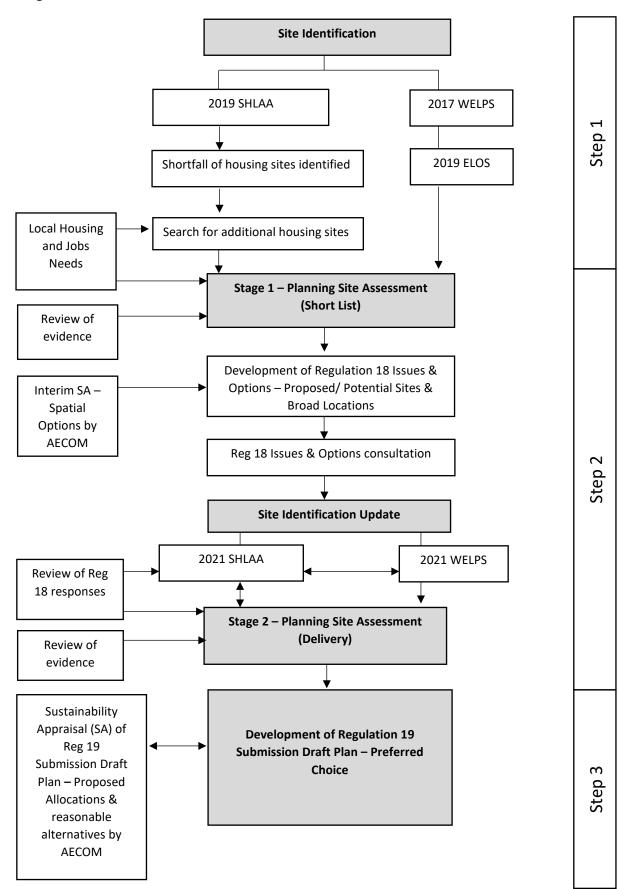
<sup>&</sup>lt;sup>5</sup> WELPS 2021, Paragraph 10.15, PP. 144-145.

# 4. The Housing and Employment Site Selection Process and Findings

- 4.1. This chapter provides a high-level summary of the site selection process followed to identify housing and employment sites for allocation in the Council's Submission Draft Local Plan.
- 4.2. The site selection process for the new Local Plan follows on from:
  - the publication of a Proposed Submission Draft Core Strategy in December 2012 and consultation on pre-submission modifications in July 2013 and December 2014;
  - the revocation of the former Regional Spatial Strategy for the North West;
  - consultation on the Borough's housing needs and land supply following the subsequent publication of the Wirral SHMA 2016 and SHLAA 2016, which were subject to public consultation in August 2016; and
  - a comprehensive review of development options, including a series of proposed development allocations, which were subject to public consultation in September 2018<sup>6</sup>.
- 4.3. The three main steps of the housing and employment land site selection process are set out below in Diagram 2. Each step is then explained with reference to the main sources of evidence and other inputs to the process, and an explanation of the planning assessment undertaken of the sites.

<sup>&</sup>lt;sup>6</sup> Further information on the background and principal findings of these consultations can be viewed at <u>https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-plans/core-strategy-local-plan-6</u>

Diagram 2 – Wirral Local Plan Site Selection Process



#### Step 1 – Identification of Sites

4.4. The first step of the site selection process was the identification of housing and employment sites. To explain the process in this background paper this step has been divided into Step 1A for housing sites and Step 1B for employment sites.

#### Step 1A - Identification of Housing Sites

4.5. Step 1A identified potential housing sites. The potential sites were primarily identified and assessed through the Wirral Strategic Housing Land Availability Assessment (SHLAA 2019)<sup>7</sup>. This was then followed by a search for additional sites following the identification of a shortfall in potential housing sites compared with the local housing need.

#### Strategic Housing Land Availability Assessment 2019

- 4.6. In 2019 the Council prepared a new SHLAA. This superseded the 2016 SHLAA which had been subject to public consultation in 2016. A proposed revised SHLAA methodology had also been subject to consultation in 2017, and the responses to both these consultations and the review of development options in 2018 were incorporated into the preparation of the 2019 SHLAA.
- 4.7. The 2019 SHLAA reviewed sites previously identified in the 2016 SHLAA and assessed new identified sites. The 2019 SHLAA, which continued to identify a shortfall in potential housing sites<sup>8</sup>, informed the preparation of the Issues and Options document which was subject to public consultation in January April 2020<sup>9</sup>.
- 4.8. Section 2 of the 2019 SHLAA set out the assessment methodology used to identify and assess sites to inform the preparation of the Local Plan. This five stage process uses the same methodology as set out in the national Planning Practice Guidance (PPG). Figure 1 from the 2019 SHLAA shows this process and is included as Appendix 1 of this background paper. Each stage of the process the Council followed is briefly summarised below. Full details are set out in the 2019 SHLAA.

#### Stage 1: Site Identification

4.9. As small sites make a significant contribution to Wirral's housing land supply, a minimum site size threshold was not applied in the 2019 SHLAA and all sites were assessed.

 <sup>&</sup>lt;sup>7</sup> The SHLAA 2019 is the result of a continuous process of 'calls for sites' and the preparation and publication of SHLAAs since 2008, used to inform public consultation at key stages in the plan preparation process.
<sup>8</sup> SHLAA 2019 Table 2.8, Page 26 refers.

<sup>&</sup>lt;sup>9</sup> Further information on the background and content of the Issues and Options Consultation can be viewed at <u>https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/wirrals-new-local-plan/new-local-plan</u>

- 4.10. Sites were identified from the following sources of supply, to ensure that as wide a range as possible of potential sites were identified for assessment:
  - Relevant sites contained in previous versions of the SHLAA (2008, 2011, 2012, 2014, 2015, 2016) and draft SHLAA 2018 (unpublished);
  - Sites already subject to the planning process including refused, lapsed or withdrawn applications;
  - Sites submitted for consideration by landowners, developers or the public as part of the preparation of the Wirral Local Plan, including at the end of an ongoing 'Call for Sites' exercise in June 2019;
  - Other sites proposed to be included on the statutory Register of Brownfield Land;
  - Vacant sites allocated or designated for employment or commercial development in the Unitary Development Plan for Wirral as identified in a draft Employment Land Options Study 2019;
  - Sites identified by the Council or by its public sector partners for potential future disposal;
  - Urban open space not in active use for recreation or subject to a designation for protection from development; and
  - Any additional available sites made known to the Council through other partnership working, development management and site disposal processes.
- 4.11. Site assessments were carried out for all sites to record:
  - Site size, boundaries and location;
  - Current land use and character;
  - Land uses and character of surrounding area;
  - Physical constraints<sup>10</sup>;
  - Potential environmental constraints<sup>11</sup>;

<sup>&</sup>lt;sup>10</sup> Including access, contamination, land contours, flood risk, natural features or significance, location of infrastructure and utilities, Aviation Zone Noise Control, Wastewater Treatment Works, Electricity High Voltage Lines, Oil Pipelines and COMAH sites.

<sup>&</sup>lt;sup>11</sup> Undertaken using data provided by the Merseyside Environmental Advisory Service including RAMSAR, WeBs count areas, Nature Improvement area, Special Area of Conservations, Special Protection Areas, Local Nature Reserves, Sites of Special Scientific Interest, Local Wildlife, Ancient Woodland, Biodiversity Action Plan area, Tree Preservation Orders, High quality agricultural land, Flood risk zones and surface water flooding, Groundwater special protection zones and Local Geological Sites.

- Potential heritage constraints<sup>12</sup>;
- Consistency with national and Development Plan policies<sup>13</sup>;
- Proximity to services and other social infrastructure<sup>14</sup>; and
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 4.12. The full list of evidence used in the 2019 SHLAA is set out in Appendix 1 of the 2019 SHLAA report. This also included updates from relevant Council Officers and information obtained through site visits.
- 4.13. Sites with extant planning permission were excluded from the SHLAA site assessment process but added to the list of sites with planning permission as part of the future land supply calculation and housing trajectory.

#### Stage 2: Site Assessment

4.14. Each site was assessed for 'suitability', 'availability and 'achievability' including whether the site was economically viable. This provided the information on which a judgement could be made as to whether a site could be considered 'deliverable' within the next five years or 'developable' over a longer period.

#### Assessment of 'Suitability'

4.15. Each site was assessed to identify its overall suitability for new housing development using the information collected as summarised in Paragraph 4.11 above<sup>15</sup>.

#### Assessment of 'Availability'

- 4.16. Each site was assessed to determine if it was free of legal or ownership problems and that a willing landowner or developer was in control of the site. Land ownership constraints were examined in the following ways:
  - Information submitted in response to public consultation or through 'call for sites' exercises;
  - Determining whether a site is in active use and how likely it is that this will cease, and whether the site is likely to be available for other uses;

<sup>&</sup>lt;sup>12</sup> Including Registered Park and Gardens, Scheduled Ancient Monuments, Listed Buildings, Conservation Areas, and Sites of Archaeological Importance.

<sup>&</sup>lt;sup>13</sup> Including Green Belt, Mineral Safeguarding Areas, designated open space, Article 4 Directions, Public Rights of Way.

<sup>&</sup>lt;sup>14</sup> Such as public transport including distance to GP, bus stop, train station, primary and secondary school, and the most accessible facilities within 400m and 600m.

<sup>&</sup>lt;sup>15</sup> SHLAA 2019, Paragraphs 2.10 to 2.15.

- Identifying the likely disposal date and decision-making process for any Council or other public sector land;
- Ownership information from planning application forms;
- Whether a site is owned by a developer, has had developer interest or has been marketed for sale;
- By contacting landowners to establish whether they are interested in the possibility of development and when their site is likely to become available for development.
- 4.17. Only where a positive response was received was a site treated as 'available' and added to the SHLAA future housing trajectory.
- 4.18. Where potential problems were identified, sites were deemed 'uncertain' or 'unavailable', depending on the nature of the information available and their likely implications for the future availability of the site. The availability of sites where the intentions of the landowner were unknown or no further information was obtained were deemed 'uncertain' and the site was not included in the SHLAA future housing trajectory.

#### Assessment of 'Achievability'

- 4.19. The 2019 SHLAA took into account developer interest and assessed market, cost and delivery factors through the Council's Development Viability Baseline Report (updated 2018), which tested the likely profitability of a range of development typologies, set within the existing planning policy framework, based on four geographical viability zones, reflecting variations in housing market strength.<sup>16</sup>
- 4.20. The planning background of a site, such as a history of unimplemented or refused permissions was also considered.
- 4.21. Sites where funding or support had been secured or programmed, for example, as part of the Council's affordable housing programme, were deemed to be 'achievable' and added to the SHLAA housing trajectory, as appropriate.
- 4.22. Only sites that could be shown to be 'viable' or which were supported by a programmed initiative were categorised as 'achievable' and added to the SHLAA housing trajectory. Sites that were 'marginal' were categorised as 'uncertain' and excluded from the trajectory. Sites that were identified as 'unviable' were also excluded from the SHLAA trajectory.

<sup>&</sup>lt;sup>16</sup> SHLAA 2019, Paragraphs 2.21 - 2.27.

4.23. The potential number of dwellings that could be delivered on a site was estimated having regard to the site size, net developable area and the potential density of development. Higher densities were applied on sites within 400 metres walking distance of a shopping centre or high frequency public transport corridor and in areas of greatest need of social, economic and environmental regeneration. Lead-in times and build-out rates were also calculated. The future delivery of existing planning permissions was also reviewed.<sup>17</sup>

#### Stage 3: Windfall Assessment

4.24. An assessment was made of the potential for windfall development and a windfall allowance included in the future housing supply. An allowance was also included for dwellings that would need to be replaced after being cleared or lost from the housing stock.<sup>18</sup>

#### Stage 4: Assessment Review

- 4.25. Stage 4 of the 2019 SHLAA presented the overall findings, including the identification of the Borough's 'deliverable' and 'developable' housing land supply over the next five years.
- 4.26. A total of 821 sites had been identified and included within the initial SHLAA assessment process. Of these 756 sites were rolled forward from the 2016 SHLAA and 65 were new sites. Table 2.6 of the 2019 SHLAA set out a summary of the initial SHLAA 2019 results as follows:

Number of Sites	Percentage	Status	
Sites included in the housing trajectory			
62	8%	Suitable – included in trajectory	
Sites not currently included in the housing trajectory			
183	22%	Suitable – further information required	
73	9%	Uncertain – further information required	
302	37%	Unsuitable	
201	24%	Removed from SHLAA	

Table 2.6: Summary of Initial SHLAA Results<sup>19</sup>

4.27. 62 sites were assessed as 'Suitable – included in trajectory'. The total potential dwelling yield from these 62 sites in the 15-year trajectory for 2019/20 to 2033/34 was 5,012 dwellings.<sup>20</sup>

<sup>&</sup>lt;sup>17</sup> SHLAA 2019, Paragraphs 2.28 - 2.48.

<sup>&</sup>lt;sup>18</sup> SHLAA 2019, Paragraphs 2.49 - 2.62.

<sup>&</sup>lt;sup>19</sup> Source: SHLAA 2019, Pages 20 – 21.

<sup>&</sup>lt;sup>20</sup> SHLAA 2019, Appendix 2, Housing Trajectory, Page 35.

- 4.28. 183 sites were assessed as 'Suitable further information required'. These sites were considered suitable for new housing development, but their availability was currently uncertain, mainly due to the lack of an up-to-date contact with a landowner or developer. In some cases, these sites had also been subject to a previous planning permission which had now lapsed.
- 4.29. The Council's Development Viability Baseline Report 2018 indicated that some of these sites might have viability issues and due to the economic climate were not currently considered deliverable in the current market. If the economic situation improves or funding can be secured, it was considered reasonable to assume that some of these sites, particularly where development was only currently marginal, could come forward sooner but they were not included in the housing trajectory in the 2019 SHLAA. The 2019 SHLAA noted that the Council had commissioned further work in relation to land ownership and viability which would inform an update to the SHLAA.
- 4.30. 73 sites were also not included in the SHLAA trajectory because they were deemed 'Uncertain further information required' and may or may not be suitable because of a known physical or policy constraint that would need further, more detailed resolution before their suitability for a residential development could be confirmed. This included sites containing sports facilities that may require relocation, sites in Conservation Areas which would require a more detailed heritage appraisal, and sites where flood risk may need to be resolved before permission for development could be granted. It was considered that these sites could only currently be brought forward through a detailed planning application which directly addresses the issues of concern, before they could be included in the housing trajectory.
- 4.31. A further 302 sites were assessed as 'Unsuitable' and had major physical or policy constraints that were currently unlikely to be capable of being resolved. 197 of these sites were within the Green Belt. All greenfield Green Belt sites were deemed 'Unsuitable' pending further consideration of whether exceptional circumstances justified the release of the land for these sites from the Green Belt.
- 4.32. 201 sites were removed from the SHLAA assessment. 166 sites were removed as they were no longer available for development and 36 were removed as they now had planning permission for development.
- 4.33. The 2019 SHLAA also set out the approach that had been taken to sites subject to the following ongoing initiatives<sup>21</sup>:
  - Wirral Waters only sites within the project that had a current development programme at April 2019 were included in the 2019 SHLAA housing trajectory;

<sup>&</sup>lt;sup>21</sup> SHLAA 2019, Paragraphs 2.74 - 2.85.

- Wirral Growth Company Council sites already identified as subject to the joint venture partnership were included in the 2019 SHLAA housing trajectory;
- Council Owned Sites suitable sites were included in the assessments where they had been subject to a service level review, and sites were included in the 2019 SHLAA housing trajectory where a resolution had been passed for the site's disposal or development, and where that sale or development was known to be proceeding at April 2019;
- Re-designation of Employment Land at the time of the 2019 SHLAA the Council had commissioned an Employment Land Options Study to consider the potential to re-designate employment land for housing this study was still ongoing, therefore none of the potential sites that might be identified were yet included in the SHLAA housing trajectory; and
- Draft Birkenhead Regeneration Framework at the time of the 2019 SHLAA the Council had commissioned the preparation of the Birkenhead Regeneration Framework and this work was still ongoing, therefore only sites that were subject to major regeneration initiatives that were already underway or which were being brought forward by the Wirral Growth Company were included in the SHLAA housing trajectory.
- 4.34. The 2019 SHLAA housing trajectory at April 2019 identified a total supply for the period 2019-2034 of 9,256 dwellings comprised of:
  - 5,012 dwellings on sites assessed as 'suitable' in the SHLAA<sup>22</sup>
  - 1,994 new build dwellings with planning permission under construction or not started<sup>23</sup>
  - 1,050 dwellings allowance for new build windfalls<sup>24</sup>
  - 1,200 dwellings allowance for net gains from conversions and changes of uses<sup>25</sup>.
- 4.35. This was a shortfall of 3,494 dwellings compared with the total housing requirement as identified at that time of 12,750 dwellings. The 12,750 dwellings comprised the local housing need (based on the MHCLG Standard Method) of 12,000 dwellings for the period 2019-2034 plus an allowance of 750 dwellings for demolitions.

<sup>&</sup>lt;sup>22</sup> SHLAA 2019, Appendix 2, Page 35.

<sup>&</sup>lt;sup>23</sup> SHLAA 2019, Appendix 2, Page 67.

<sup>&</sup>lt;sup>24</sup> SHLAA 2019, Paragraph 2.57 - 70 pa x 15 years

<sup>&</sup>lt;sup>25</sup> SHLAA 2019, Paragraph 2.55 - 80 pa x 15 years.

#### Search for additional urban housing sites, 2019

- 4.36. In the light of the results of the 2019 SHLAA the Council sought to establish if the supply of deliverable and developable land in the urban areas could be increased by identifying additional housing sites and increasing the supply from sites already identified by undertaking the following actions:
  - a) Identifying additional potential sites or sources of sites and the potential for increasing capacity by:
    - reviewing all lapsed and soon to lapse planning permissions;
    - examining whether some existing employment sites would be better used for housing purposes through the commissioning of the Wirral Employment Land Options Study (see paragraphs 4.57 - 4.65 below of this background paper for further details);
    - commissioning the Wirral Density Study and the Wirral Empty Homes Report to seek additional housing supply through increasing urban density and bringing empty homes back in to use;
    - undertaking a comprehensive review of all Council owned land to identify new opportunities for housing;
    - reviewing the provision of urban open space through the commissioning of an Open Space Assessment and Standards Paper and an up-to-date Playing Pitch and Outdoor Sport Strategy;
    - commissioning the preparation of the Birkenhead Regeneration Framework and Neighbourhood Frameworks<sup>26</sup> to identify any further areas of opportunity for housing-led regeneration within and around the central areas of Birkenhead and create a series of high quality 'green mixed-use urban villages';
    - identifying other medium to longer term broad locations for regeneration growth, including the river corridor between Seacombe and New Brighton, and within New Brighton itself; and
    - undertaking a further comprehensive 'Call for Sites', as part of the Regulation 18 Issues and Options consultation.
  - b) Confirming the availability of sites by:
    - proactively contacting landowners who had not recently contacted the Council to confirm that they were still willing to bring their sites forward for development.

<sup>&</sup>lt;sup>26</sup> Formerly known as Delivery Action Plans.

c) Confirming the achievability and deliverability/ developability of sites by:

- undertaking further, more detailed, research on the viability of housing development and how this might best be tackled and addressed;
- working proactively with developers and funding partners to accelerate the development of sites;
- working with the Council's Joint Venture Partner MUSE to deliver an accelerated housing programme through the Wirral Growth Company;
- seeking to further accelerate housing delivery on large strategic sites, by working with Peel Developments at Wirral Waters and the owners of sites at Hind Street and Woodside; and
- working with Registered Social Landlords to utilise their expertise and resources to bring forward new social rented housing across the Borough, particularly on sites that might not currently be viable for market development.
- 4.37. The emerging results of this search for additional housing sites and supply were fed into the Stage 1 Planning Site Assessments in Step Two of the site selection process. This was in terms of:
  - updating the list of sites for assessment by adding new potential sites, such as the existing employment sites identified for potential release for housing from the emerging Employment Land Options Study;
  - updating the capacity of sites; and
  - updating the availability and achievability of sites/ deliverability.

#### Interim Green Belt Site Assessment, December 2019

- 4.38. Following the Wirral Green Belt Review in 2019 the Council undertook an Interim Green Belt Site Assessment. This is included as Appendix 4.7 in the Issues and Options document.
- 4.39. The Wirral Green Belt Review 2019 assessed the whole of the Wirral Green Belt against the five purposes of Green Belt set out in the National Planning Policy Framework. This process identified weakly performing parcels with potential for release from the Green Belt for development.<sup>27</sup>
- 4.40. The Council identified two main high-level Green Belt Options by considering the potential land for release from the Green Belt for development using the following steps and assumptions:

<sup>&</sup>lt;sup>27</sup> Wirral Local Plan 2020-2035(Regulation 18) Issues and Options Consultation document, Appendix 4.7, Map A.

- Excluding land in flood zone 3;
- Excluding land with statutory environmental designations;
- Including parcels identified as performing 'weakly' against Green Belt purposes; and
- Prioritising 'weakly' performing parcels with a known developer or landowner interest (to ensure evidence of developability).
- 4.41. More detailed assessments of the suitability, availability and achievability of the proposed areas of land were not undertaken at this stage as the intention was to undertake further work if it was still concluded that insufficient urban land could be identified as 'deliverable' or 'developable' within the Plan period.
- 4.42. The Green Belt options were refined by considering the likely development potential within each of the 'weakly' performing parcels identified.<sup>28</sup>
- 4.43. Two areas were initially identified for potential larger urban extensions, which might have the potential to deliver sufficient capacity to meet the scale of the potential shortfalls then being identified to the west of Barnston Road at Heswall; and to the east of the M53 motorway at Eastham.<sup>29</sup>
- 4.44. The land at Eastham was discounted because existing evidence suggested that significant parts of this area would not be suitable for development and that the remaining sites would be too small and too sparsely distributed to form a logical single urban extension of sufficient size. The basis for this conclusion is set out in Tables A and B of Appendix 4.7 in the Issues and Options document.
- 4.45. The second Green Belt Option was a dispersed release of sites that would also meet the initial screening criteria set out in paragraph 4.40 above.
- 4.46. In order to identify the land that could potentially be released from the Green Belt, the Council reviewed the 'weakly' performing parcels containing submitted sites identified in the Green Belt Review against the evidence that had been collected on each site as part of the earlier preparation of the Local Plan. The interim conclusions and the information on which they were based is set out in Table B of Appendix 4.7 in the Issues and Options document. Table B also identified outstanding issues for further consideration and detailed assessment if the sites were to be considered further for allocation.

 <sup>&</sup>lt;sup>28</sup> Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options consultation document, Appendix 4.7, Map B.
<sup>29</sup> Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options consultation document, Appendix 4.7, Map C.

#### <u>Step 1B – Review of Existing Employment Sites and Identification of</u> <u>New Employment Sites</u>

4.47. Step 1B in relation to the employment sites comprised two elements: reviewing existing employment sites and identifying potential sites for allocation as new employment sites. This was originally undertaken as part of the Wirral Employment Land and Premises Study in 2017 and then supplemented by the Wirral Employment Land Options Study in 2019.

#### Wirral Employment Land and Premises Study 2017

- 4.48. The Wirral Employment Land and Premises Study (WELPS) was commissioned in 2017 with the aim of recommending an appropriate employment land portfolio for the Borough to inform the emerging Local Plan.
- 4.49. The 2017 WELPS assessed the current employment land portfolio to determine the suitability and deliverability of sites and land, considering whether they should be retained or released for other issues. The study recommended an employment land portfolio for Wirral to inform the emerging Local Plan having regard to both quantitative and qualitative factors. The study considered B-class land uses only.
- 4.50. The strategic approach to determining Wirral's employment land demand and supply balance was framed by three key objectives including:
  - protect and provide good quality sites suitable for employment uses with the greatest prospect of delivery over the Local Plan period and to respond to areas of strong market demand, principally Bromborough;
  - remove policy protection for employment designations and de-allocate poorer quality sites that don't meet business needs, and those which have significant deliverability and viability issues; and
  - distinguish between meeting Wirral's Local Business needs and those strategic requirements generated by the wider Liverpool City Region and Inward Investment.
- 4.51. Chapter 7 of the 2017 WELPS set out in detail the approach, including the criteria and criteria rating categories used, and the findings of the employment land supply assessment. The assessment considered the characteristics and quality of land and sites in Wirral, and their suitability and deliverability to meet future employment development needs.
- 4.52. The review focused upon sites and land currently in existing employment uses, or allocated for employment use within the adopted Unitary Development Plan. This represented Wirral's current employment land supply. Additional potential sites were also assessed to determine their suitability for employment use. These were mostly sites with no notation in

the UDP along with those subject to designations such as Key Town Centre. These sites were not currently part of Wirral's allocated employment land supply but were assessed to determine whether they were suitable for such uses.

- 4.53. In total 93 sites were assessed covering 237 ha (gross land), with 41 sites (with a net developable area of 59.5 ha) recommended to form the employment land supply. These comprised:
  - 8 retained Employment Development Sites;
  - 26 retained Primarily Industrial Area designations;
  - 4 potential sites considered suitable employment sites and recommended to be allocated for B-class use; and
  - 3 extant planning permissions for B-class employment use.<sup>30</sup>
- 4.54. A further 42 sites were discounted from the recommended employment land supply but retained in the overall portfolio. These included 13 Wirral Waters sites of strategic importance to the wider Liverpool City Region, 12 sites appropriate for mixed use development, and 17 sites safeguarded for long-term employment use. 13 sites were recommended for de-allocation, released for other uses or not allocated for B-class employment use.
- 4.55. The 2017 WELPS concluded that compared with the 'Past Completions' demand scenario there would be a shortfall of approximately 20 hectares within the Plan period, against a total need of 80 hectares.
- 4.56. Further details of the 2017 WELPS site assessment are set out in Appendices 4 7 of the Study as follows:
  - details of the criteria used to rate the sites (Appendix 4);
  - the individual sub-area maps for the assessed sites (Appendix 5);
  - tables summarising the assessment of each site against the appraisal criteria (Appendix 6); and
  - the detailed site pro-formas containing photographs, red-line boundaries on aerial maps, descriptions, assessments, the final rating and recommendation for each of the assessed sites (Appendix 7).

<sup>&</sup>lt;sup>30</sup> Wirral Employment Land and Premises Study 2017, Paragraph 7.17, page 68. Three sites with extant planning permission were identified as of July 2017. These sites formed part of the Borough's employment land supply and were not assessed as part of the Study.

#### The Employment Land Options Study 2019

- 4.57. In the light of the identified shortfall of employment sites identified in the 2017 WELPS and the identified shortfall of housing sites identified in the 2019 SHLAA, the Council commissioned the 2019 Employment Land Options Study (ELOS) to:
  - a) review the existing local and sub-regional economic evidence base;
  - assess key employment sites to determine whether they continue to be suitable and deliverable employment sites having regard to specific site characteristics, constraints, market demand, local economic requirements and trends;
  - c) review the 13 strategic sites at Wirral Waters assessed as part of the WELPS to consider which sites, if any, could be reclassified as part of the deliverable employment land supply.
  - d) assess the cumulative impact of any sites recommended for release for alternative use on the quantitative and qualitative supply of employment land required to meet the emerging Local Plan requirements; and
  - e) subject to (c), provide an assessment of the most suitable location for meeting any shortfall in quantitative and / or qualitative supply including Green Belt locations.
- 4.58. The 2019 Employment Land Options Study (ELOS) assessed 36 existing or potential employment sites to determine whether they continued to be suitable and deliverable employment sites having regard to specific site characteristics, constraints, market demand, local economic requirements and trends.
- 4.59. The 36 sites assessed in the ELOS comprised: 25 sites from the 2017 WELPS which were being promoted, or were close to sites being promoted, for residential development; an additional 10 existing employment sites identified as potential housing sites in the 2019 SHLAA; and one new potential employment site.
- 4.60. The ELOS also considered whether the Wirral Waters sites, which the 2017 WELPS had excluded from the employment land supply because of their strategic significance and the likelihood that they would not be meeting local needs, could now be included in the general employment land supply given greater understanding and evolution of the proposals there.
- 4.61. Chapter 3 of the ELOS sets out the site assessment criteria and Chapter 4 summarises the findings of the ELOS site assessment exercise, specifically identifying those sites that it considered most appropriate for the Council to consider releasing from the employment land supply. Figure 8 in the ELOS sets out the net impact on the 2017 WELPS recommended land supply of the ELOS' recommendations.

- 4.62. The ELOS concluded that 24 of the 36 sites assessed could be released in full or part for residential or mixed use development as part of a wider comprehensive approach or strategic regeneration area. The remaining 12 assessed sites were recommended to be retained as part of a Primarily Industrial Area or allocated for employment land.<sup>31</sup>
- 4.63. In relation to the Wirral Waters sites the ELOS concluded that five sites be considered as part of general employment land supply able to meet land requirements over the plan period rather than forming part of the group of Wirral Waters strategic employment sites which the 2017 WELPS recommended should not be included in the deliverable employment land supply. Three sites were considered to not be appropriate for inclusion in the general employment land supply, and two sites were considered to be mixed use opportunities.<sup>32</sup>
- 4.64. The cumulative impact of the recommendations of the ELOS was a net increase of 14.49 ha that could be treated as part of the recommended employment land supply for allocation in the Local Plan.
- 4.65. Appendices I and II of the ELOS include the site plans and completed site assessments.

#### Step 2 – Planning Assessment of Sites

- 4.66. Step 2 of the housing and employment site selection process was divided into two stages.
- 4.67. The first stage involved an initial planning assessment of all the reasonable alternative sites to determine whether the sites should be ruled out or taken forward to the next stage, the findings of which were presented in the Issues and Options consultation.
- 4.68. The second stage followed the Regulation 18 Issues and Options consultation, updates to the SHLAA and WELPS, as well as new/ updated evidence, and entailed a more detailed planning assessment to determine whether each of the alternatives should be allocated in the Regulation 19 Submission Draft Plan.

#### Stage 1 - Planning Site Assessment (Short List), 2019

4.69. The Stage 1 Planning Site Assessment considered each of the reasonable alternative sites against the emerging Preferred Spatial Strategy for Urban intensification. The assessment also considered deliverability using the information contained in the 2019 SHLAA and from previous consultation, as to whether the site was 'Available', 'Suitable', 'Achievable' for the housing sites and the information contained in the 2017 WELPS and 2019 ELOS for

<sup>&</sup>lt;sup>31</sup> Wirral Employment Land Options Study, Figure 7: ELOS Site Recommendations, pages 28 -42

<sup>&</sup>lt;sup>32</sup> Wirral Employment Land Options Study 2019, Figure 5: Wirral Waters ELOS Site Recommendations, Pages 22 – 23 and Paragraph 4.3, Page 44.

the employment sites. The SA conclusion from the Interim SA Spatial Options was also considered (see paragraphs 4.75 - 4.76 below).

- 4.70. For the housing sites the primary source of evidence for the Stage 1 Planning Site Assessment was the 2019 SHLAA. As explained in Paragraph 4.11 above of this background paper, the 2019 SHLAA used an extensive list of evidence to assess the suitability of the sites considered in the SHLAA. Consequently, whilst the evidence base for each site was checked as part of the Stage 1 assessment it was not necessary to repeat the suitability assessment undertaken for the SHLAA in the Stage 1 Planning Site Assessment.
- 4.71. None of the sites assessed as 'suitable' in the 2019 SHLAA were rejected or 'ruled out' at the Stage 1 Planning Site Assessment:
  - 60 sites were assessed as 'potential housing allocations' and taken forward to the next stage for inclusion in the Stage 2 assessment;
  - A further 25 sites were assessed as 'potential additional urban housing allocations' (including sites identified through the emerging Employment Land Options Study) and taken forward to the next stage for inclusion in the Stage 2 assessment; and
  - 52 sites were assessed as 'suitable but currently uncertain' potential housing allocations and taken forward to the next stage for inclusion in the Stage 2 assessment. These sites were mainly where progress was known to have stalled or viability was known to be an issue.
- 4.72. In addition to considering specific sites, additional broad locations were identified from the search for additional housing sites and supply work (see Paragraph 4.36 above) and existing regeneration priorities, including land at Wirral Waters, Hind Street, Woodside and in and around Birkenhead Town Centre. These broad locations were assessed as part of the Stage 1 Planning Site Assessment and all taken forward to the next stage for inclusion in the Stage 2 assessment.
- 4.73. As noted in Paragraph 4.31 above, 197 sites within the Green Belt were considered in the 2019 SHLAA. All the greenfield Green Belt sites were deemed 'Unsuitable' pending further consideration of whether exceptional circumstances justified the release of land for these sites in the Green Belt. Potential land for release from the Green Belt for development was subject to its own assessment (as explained in Paragraphs 4.38 4.46 above) through the Wirral Green Belt Review 2019 and the Interim Green Belt Site Assessment 2019. The conclusions of this assessment were considered as part of the development of the Regulation 18 Local Plan Issues and Options document, as explained below.

4.74. For the employment sites the primary source of evidence for the Stage 1 Planning Site Assessment was the 2017 WELPS and the 2019 ELOS. The suitability of the employment sites was considered in relation to the same sources of data and evidence as for the housing sites in the SHLAA. 36 urban sites were assessed as potential allocations for employment B-class uses and were taken forward to the next stage for inclusion in the Stage 2 assessment.

#### Interim Sustainability Appraisal: Appraisal of Spatial Options, 2019

- 4.75. The Interim Sustainability Appraisal (SA) report was prepared in 2019 and published for consultation alongside the Issues and Options document in January 2020. The Interim SA set out the high-level findings of an appraisal of the main spatial options for the spatial strategy which included Option 1A Urban Intensification; Option 1B Urban Intensification with Stepped Approach; Option 2A Dispersed Green Belt Release; and Option 2B Single Urban Extension as set out in the Issues and Options Consultation documents. The purpose at that stage was to inform the decision-making process in relation to the emerging spatial strategy.
- 4.76. A range of housing sites were identified for each option, with an assumption that these would come forward as part of each option to meet the housing delivery target. There were also assumptions about committed sites, windfall and conversions, and the amount of growth that could practically be delivered at Wirral Waters (then estimated by the site promoter at 4,650 dwellings over the plan period)<sup>33</sup>, which were constant elements in each of the options. The differences related to where 'residual' housing needs would be met, which was estimated to be a shortfall of at least 2,444 dwellings to 2035, if urban intensification and additional housing allocations could not be secured<sup>34</sup>. The impact of individual sites was not assessed in detail at this stage.

## Development of the Regulation 18 Local Plan Issues and Options – Proposed/ Potential Sites and Broad Locations, 2019

- 4.77. The Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options Consultation document published in January 2020 set out the following:
  - Key issues the Local Plan must address;
  - Draft vision and strategic priorities;
  - Housing and employment development needs which the Plan must allocate sufficient land for;
  - Preferred option for meeting these needs within the urban area, and other alternative options for meeting any remaining need through Green Belt release;
  - Proposed urban housing and employment allocations;

 <sup>&</sup>lt;sup>33</sup> A long term outline permission for up to 13,521 new dwellings, extending for 22 years subject to the phased submission of reserved matters, was granted for the creation of a new mixed-use city neighbourhood at East Float, in May 2012, only part of which would be able to be delivered within the Plan period.
<sup>34</sup> Issues and Options Consultation January 2020, Table 4.1, Page 55 and Table 4.2 page 58 refer).

- Potential Broad Locations for Growth<sup>35</sup>;
- Information on key strategic sites<sup>36</sup>; and
- The proposed policy approach across a range of topics including environment, climate change, infrastructure, open space and heritage.
- 4.78. As explained in Section 2.3 of the Issues and Options document, at that time the housing need for Wirral was identified as a minimum of 12,000 net new dwellings for the Plan period of 2020-2035 plus an allowance for demolitions of 750 dwellings. Section 2.5 of the Issues and Options document explained the employment land need for Wirral was 80.4 ha based on the past completions scenario in the WELPS 2017, updated to take account of the latest employment completion figures.<sup>37</sup>
- 4.79. Four spatial options were identified in Section 4 of the Issues and Options document to meet Wirral's housing and employment requirements:

Urban only options:

- Option 1A: Urban Intensification (Preferred Approach)
- Option 1A: Urban Intensification with stepped delivery

Options for meeting any residual development requirements through Green Belt release:

- Option 2A: Dispersed Green Belt Release
- Option 2B: Single Urban Extension
- 4.80. A strategy of Urban Intensification (Option 1A) was identified as the Council's preferred option, to promote urban regeneration and prevent the need to identify land for development in the Green Belt. This strategy involved maximising the use of all available land, including suitable previously developed brownfield sites.
- 4.81. The results of the Stage 1 Planning Site Assessment of potential housing sites were fed into the preparation of the Issues and Options document in terms of updating the potential supply of housing including identifying proposed housing allocations and a list of potential additional urban housing allocations.
- 4.82. The 60 sites that passed the Stage 1 Planning Site Assessment were identified as 'proposed urban housing allocations' in the Regulation 18 Local Plan Issues and Options. These sites were predominantly previously developed brownfield sites but also included some urban greenfield sites. The total housing supply from these proposed urban housing allocations was 5,310 dwellings. These sites are listed in the Issues and Options document, Appendix 4.5, pages 2-7.

<sup>&</sup>lt;sup>35</sup> Including Hind Street, Woodside, Central Birkenhead, Wirral Waters and its partnership neighbourhoods at Hamilton Park, Scott's Quay and Seacombe, and New Brighton.

<sup>&</sup>lt;sup>36</sup> Including Wirral Waters, Hind Street, Woodside and Birkenhead Town Centre.

<sup>&</sup>lt;sup>37</sup> Wirral Local Plan 2020-2035 Issues and Options, Table 2.6, Page 32.

- 4.83. A further 25 sites that passed the Stage 1 Planning Site Assessment were identified as 'potential additional urban housing allocations'. These were the sites identified through the search for additional sites as part of Step 1 of the site selection process (see Paragraph 4.36 above). The total housing supply from these potential additional housing allocations was 2,124 dwellings. These sites are listed in the Issues and Options document, Appendix 4.2.
- 4.84. The 52 sites that were assessed in the Stage 1 Planning Site Assessment as 'suitable but currently uncertain' were also taken forward to the next stage for inclusion in the Stage 2 assessment to see if the constraints identified could be overcome. These sites were considered suitable for housing development but currently unable to meet the tests of being deliverable and developable within the Plan period. These sites included sites where planning permission has previously been granted but has now lapsed; where the landowner has not recently indicated that they are still willing to take the site forward for development; and sites which have been identified as unviable in the current market. The total housing supply from these sites was 721 dwellings. These sites are listed in the Issues and Options document, Appendix 4.3.
- 4.85. The Council concluded that subject to the intensification and re-scheduling of 'deliverable' and 'developable' sites and confirming that the 'potential additional urban housing allocations' met the test of being deliverable and developable within the Plan period, no land would need to be released from the Green Belt. However, until that could be demonstrated the Council considered that other potential alternative options should continue to be identified, including the possible release of land from the Green Belt.
- 4.86. The Issues and Options Consultation document therefore also set out two main Green Belt options, that would each be able to deliver the 2,500 homes that it was considered, at that stage, might be needed if the necessary 'deliverable' and 'developable' urban land supply could not be secured. Option 2A was the potential for a dispersed release of land from the Green Belt and Option 2B was the potential for a single urban extension to be identified.
- 4.87. Twelve parcels for potential release from the Green Belt were identified under Option 2A in Table 4.5 and Figure 4.6 of the Issues and Options document<sup>38</sup>.
- 4.88. Four parcels (of which two were identified together) for potential release from the Green Belt were identified under Option 2B in Table 4.7 and Figure 4.7 of the Issues and Options document<sup>39</sup>.
- 4.89. The results of the Stage 1 Planning Site Assessment of potential employment sites were also fed into the preparation of the Issues and Options document.

<sup>&</sup>lt;sup>38</sup> Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options Consultation document, Pages 98 – 100.

<sup>&</sup>lt;sup>39</sup> Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options Consultation document, Pages 104 – 105.

4.90. The 36 sites that passed the Stage 1 Planning Site Assessment were identified as 'proposed urban employment allocations' in the Regulation 18 Local Plan Issues and Options. These sites were proposed for allocation for employment B-class uses. The sites were all within the existing urban areas and predominantly previously developed brownfield sites but also included some urban greenfield sites, where they were also considered suitable to accommodate new employment development. Collectively these sites could provide up to 105 hectares and would therefore meet the required amount of employment land of 80 hectares. The proposed urban employment allocations are listed in the Issues and Options document, Appendix 4.6, pages 1-3.

#### Site Identification Update

4.91. Following the Regulation 18 Issues and Options consultation the Council prepared an update to the SHLAA and commissioned an update to the 2017 WELPS.

#### Strategic Housing Land Availability Assessment 2021

- 4.92. Following the Regulation 18 Issues and Options consultation the Council prepared an updated SHLAA for publication alongside the Regulation 19 Local Plan. The 2021 SHAA supersedes the published 2019 assessment by reviewing the status and conclusions previously reached for sites already within the SHLAA process, identifying the sites that will be relied upon as part of the Local Plan housing trajectory, and assessing new sites which have emerged.
- 4.93. The assessment methodology used to identify and assess sites in the 2021 SHLAA was the same as the methodology used in the 2019 SHLAA, further informed by the findings of:
  - Wirral Density Study 2021;
  - Wirral Employment Land and Premises Study Update 2021;
  - Wirral Open Space Assessment and Standards Paper 2021;
  - Wirral Playing Pitch and Outdoor Sports Strategy 2021;
  - Wirral Strategic Flood Risk Assessment 2021;
  - Draft Birkenhead Regeneration Framework and associated documents, and work for the regeneration frameworks/ masterplan for New Brighton, Liscard and New Ferry; and
  - Wirral Local Plan CIL and Viability Assessment Study 2022 emerging results.
- 4.94. Each stage of the process the Council followed is briefly summarised below. Full details are set out in the 2021 SHLAA.

#### Stage 1: Site Identification

- 4.95. The same sources of supply were identified for the 2021 SHLAA as the 2019 SHLAA with the addition of the following:
  - sites submitted for consideration by landowners, developers or the public in response to the 'Call for Sites' exercise conducted as part of the Regulation 18 Issues and Options Consultation in January – April 2020; and
  - sites identified from the search for additional housing sites and supply work (see paragraph 4.36 above) including existing employment sites with the potential to be released for housing, additional Council owned land, housing-led regeneration opportunities, and broad locations for regeneration.
- 4.96. The same approach to site assessment was followed for the 2021 SHLAA as for the 2019 SHLAA using the same assessment criteria as previously with the inclusion of additional information for density and viability.
- 4.97. The broad locations previously identified from the search for additional housing sites and supply work in 2019 were still being further refined through additional work undertaken as part of the preparation of the Draft Birkenhead Regeneration Framework and work for the regeneration frameworks and masterplans for other emerging opportunities at New Brighton, Liscard and New Ferry<sup>40</sup> for details). Consequently, sites within the broad locations that are not proposed to be brought forward as site-specific land allocations have been excluded to avoid double-counting.
- 4.98. An updated Employment Land and Premises Study was completed in February 2021. The Study considered the potential to re-designate land currently designated for employment uses to accommodate new housing development, while ensuring the appropriate provision of land for employment. The Study's conclusions were used to guide decisions on individual sites within the 2021 SHLAA.
- 4.99. Sites in the Green Belt have continued to be discounted in the absence of exceptional circumstances.

#### Stage 2: Site Assessment

4.100. The same approach to the site/ broad location assessment was followed for the 2021 SHLAA as for the 2019 SHLAA. Each site was assessed for 'suitability', 'availability' and 'achievability' including whether the site was economically viable. This provided the information on which a judgement could be made as to whether a site could be considered 'deliverable' within the next five years or 'developable' over a longer period.

<sup>&</sup>lt;sup>40</sup> Housing Delivery Strategy, Paragraphs 2.58 - 2.66.

#### Assessment of 'Suitability'

- 4.101. Each site was assessed to identify its overall suitability for new housing development using the information collected as summarised in Paragraph 4.11 above and using the most up to date information available.
- 4.102. The full list of evidence used in the 2021 SHLAA is set out in Appendix 1 of the 2021 SHLAA report and included the Wirral Local Plan CIL and Viability Study, the Wirral Employment Land and Premises Study 2021, the updated Wirral Level 1 Strategic Flood Risk Assessment and the Level 2 Strategic Flood Risk Assessment.

#### Assessment of 'Availability'

4.103. The same approach to the assessment of 'availability' was followed for the 2021 SHLAA as for the 2019 SHLAA.

#### Assessment of 'Achievability'

- 4.104. The assessment of 'achievability' in the 2021 SHLAA has been informed by the Wirral Local Plan CIL and Viability Assessment Study, which provides a more up-to-date evidence base to assist in identifying the viability impacts of planning policies in the emerging Local Plan.
- 4.105. In the 2021 SHLAA a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 4.106. The assumptions and findings of initial advice from the Wirral Local Plan CIL and Viability Assessment Study were used to guide the judgements made in the 2021 SHLAA regarding achievability of sites, in conjunction with the following considerations:
  - Whether there is active developer interest in the site;
  - Whether similar sites have been successfully developed in recent years; and
  - Whether there are any known abnormal development costs.
  - Whether the site has any known grant funding or financial support to make it viable.
- 4.107. As in the 2019 SHLAA, the planning background of a site, such as a history of unimplemented or refused permissions has also been considered.

- 4.108. Also, as in the 2019 SHLAA, only sites that can be shown to be 'viable' or which will be supported by a programmed regeneration initiative have been categorised as 'achievable' and added to the housing trajectory in the 2021 SHLAA. Sites that are 'marginal' have been categorised as 'uncertain' and excluded from the trajectory. Sites that have been identified as 'unviable' have also been excluded from the trajectory.
- 4.109. The potential number of dwellings that could be delivered on a site was estimated having regard to the site size, net developable area and the potential density of development. In the absence of other site specific evidence, the density assumptions recommended in the Wirral Density Study 2021 have been applied. The lead-in times and build-out rates used in the 2019 SHLAA, where no further site-specific evidence has been provided, continue to reflect the results of previous industry consultation.

#### Stage 3: Windfall Assessment and Small Sites Allowance

4.110. In the 2021 SHLAA the windfall allowance included in the future housing supply has been updated. The allowance for demolitions remains unchanged but the allowance for conversions and changes of use has been increased to 100 dwellings per annum, to better reflect actual rates of delivery over the last five to ten years.

#### Stage 4: Assessment Review

- 4.111. Stage 4 of the 2021 SHLAA is presented within Section 3 of the report. This sets out the overall findings, including the identification of the Borough's 'deliverable' and 'developable' housing land supply over the next five years. The 2021 SHLAA results are summarised below.
- 4.112. A total of 759 sites had been identified and included within the initial 2021 SHLAA assessment process. Of these 601 sites were rolled forward from the 2019 SHLAA and 158 were new sites.

Number of Sites	Percentage	Status		
Sites Suita	Sites Suitable, Available, Deliverable & Developable (included in Trajectory)			
42	5.5%	Assessed as 'suitable' and included in future land supply (included in Appendix 2)		
Sites within	Sites within a Broad Location			
65	8.5%	Identified as a site within a future broad location for growth but not yet included in the future land supply (included in Appendix 3)		
Sites Suita	Sites Suitable but further information required			
179	23.5%	Assessed as 'suitable' but further information is required before they can be included in the future land supply (included in Appendix 4)		
Unsuitable	Unsuitable sites			
164	21.5%	Assessed as 'unsuitable' or 'uncertain' and not included in the future land supply (included in Appendix 5)		
210	28%	Identified as a site in the Green Belt and not subject to further assessment (included in Appendix 6)		
99	13%	Removed from SHLAA 2021 and not subject to further assessment (included in Appendix 7)		

- 4.113. 42 sites were assessed as 'Suitable' and included in future land supply. The total potential dwelling yield from these 42 sites in the 16 year trajectory for 2021-2037 was 7,755 dwellings.
- 4.114. 179 sites were assessed as "suitable" in principle for future residential development but have not been included in the trajectory or in the calculation of the future land supply because further information would be required before they could be deemed as being 'deliverable' or 'developable'. This includes sites which would require a further, more detailed specialist appraisal or investigation to be completed or a particular site-specific issue to be resolved before development could be permitted.
- 4.115. 473 sites were assessed as 'unsuitable' including 164 sites which had major physical or policy constraints that are currently unlikely to be capable of being resolved.

<sup>&</sup>lt;sup>41</sup> Source: 2021 SHLAA

- 4.116. The 2021 SHLAA housing trajectory at April 2021 identified a total supply for the period 2021-2037 of 12,953 dwellings comprised of:
  - 7,755 dwellings on sites assessed as 'suitable' in the SHLAA<sup>42</sup>
  - 2,798 new build dwellings with planning permission under construction or not started<sup>43</sup>
  - 800 dwellings allowance for new build windfalls<sup>44</sup>
  - 1,600 dwellings allowance for net gains from conversions and changes of uses<sup>45</sup>.
- 4.117. The conclusions of the 2021 SHLAA were fed into the Stage 2 Planning Site Assessment.

#### Wirral Employment Land and Premises Study 2021

4.118. Following the Wirral Local Plan 2020-2035 (Regulation 18) Issues and Options consultation the Council commissioned an update to the 2017 WELPS. The 2021 WELPS updated the anticipated demand for employment land in the Borough over the Local Plan period to 2037 and identified potential employment sites that could address this requirement and a strategy for release of any surplus employment land. The study also built on the 2019 ELOS and undertook a more detailed review of 35 of the sites considered in that study. The 2021 WELPS also updated the employment land portfolio in the 2017 WELPS.

#### WELPS 2021 Methodology

4.119. Chapter 9 of the 2021 WELPS sets out the employment land supply analysis methodology and findings. The assessment considered the level and quality of employment land supply to meet the demand. Supply was considered across Wirral as a whole on an individual site level as well as within each of the sub-areas to look at the availability of employment development land across the Borough.

<sup>&</sup>lt;sup>42</sup> SHLAA 2021, Appendix 8 page 4.

<sup>&</sup>lt;sup>43</sup> SHLAA 2021, Appendix 8 page 22.

<sup>&</sup>lt;sup>44</sup> SHLAA 2021, Paragraph 2.76 - 50 pa x 16 years.

<sup>&</sup>lt;sup>45</sup> SHLAA 2021, Paragraph 2.75 - 100 pa x 16 years.

- 4.120. As explained in Chapter 9 of the 2021 WELPS the approach to the supply analysis was in-line with the approach taken in the 2017 WELPS to allow comparison and update of the previous reports. Each site was inspected individually and scored on the following criteria:
  - Strategic Road Access
  - Local Accessibility
  - Proximity to Urban Areas/ Access to Labour and Services
  - Compatibility of Adjoining Uses
  - Developmental and Environmental Constraints
  - Market Attractiveness
- 4.121. Each site was scored on the range of 'very good', 'good', 'average', 'poor' and 'very poor' for each category; as well as being given an overall score within this range as well. More detail on the criteria used to assess each of these is contained in Appendix 3 of the 2021 WELPS. For consistency of approach these criteria replicate those used in the previous 2017 WELPS. A site by site summary of the analysis and scoring for each category are set out in Appendix 4 of the 2021 WELPS and individual proformas for each site on a criterion by criterion basis are in Appendix 5 of the 2021 WELPS. It is noted in the supply analysis in the 2021 WELPS that the site scoring is not meant as a direct comparison of sites but to provide an overall quality of land supply. Furthermore, 'lower scoring overall' sites might be assessed to be appropriate for certain use types and come forward in this instance.
- 4.122. Prior to undertaking the analysis, an initial review of the overall portfolio assessed in the 2017 WELPS was undertaken by the 2021 WELPS consultants, Avison Young, and Wirral Council to assess whether sites should be removed from the previous analysis based on their already assessed low development potential, the fact that development had now taken place on these sites in the ensuing time period, or that planning permission has been granted, meaning they should be removed from the supply (unless there was a risk that the permission could lapse). Furthermore, additional sites identified through the emerging Birkenhead 2040 Framework and wider Wirral Council discussions were included in the study where not previously identified or assessed. These sites were mainly in existing employment areas but also in the vicinity of Birkenhead Town Centre.
- 4.123. Overall, 83 sites were assessed across Wirral based on the categories set out above. These sites had a gross site area of 221 hectares and a net developable area (NDA) of 156 hectares.

4.124. As well as the overall analysis, the potential supply by sub-area was also assessed using the same five market areas as per the 2017 WELPS. Table 9.3 of the 2019 WELPS set out the potential supply of employment sites by sub-area or market area as follows:

Market Area	Number of Sites	Total Area (ha)	NDA (ha)	NDA (%)
Wirral Waters	10	38.48	23.78	15.28%
Birkenhead & Wallasey	48	81.10	53.04	34.07%
Bromborough	21	93.76	74.10	47.60%
Mid-Wirral	4	7.82	4.74	3.05%
West Wirral	0	0.00	0.00	0.00%
Total	83	221.16	155.66	100.00%

Table 9.3: Sub-Area Site Breakdown<sup>46</sup>

Source: Avison Young (2021)

- 4.125. The analysis showed a significant potential level of supply across three main areas of Wirral Waters, Birkenhead & Wallasey and Bromborough but limited supply in Mid-Wirral and no supply at all in West Wirral.
- 4.126. In addition, each site was assessed on whether it was greenfield or brownfield land as well as a brief description of the current use type. A review of planning designations was also undertaken to assess whether these could restrict future development. These factors were not scored, but provided an overview of the site, and an understanding of the current status of the site in planning terms.
- 4.127. The 2021 WELPS included viability analysis. Details of the methodology, assumptions and appraisal results are set out in Chapter 6 of the 2021 WELPS<sup>47</sup>. The appraisal results pointed to a very challenging viability position across all development types, in particular office development. An improvement in the viability position in smaller industrial units was noted since the 20217 WELPS but viability challenges remained, with a general worsening for larger units.
- 4.128. Any other factors which would limit or restrict potential development on a site were also raised, for example if there was existing occupation on site or the need for significant infrastructure investment to bring the site forward. This was informed by the assessments made in the earlier categories of this assessment. These were not scored but were used to inform the assessment of a likely five year delivery window within the 15 year local plan period (0 to 5 years, 6 to 10 years, 11 to 15 years).

<sup>&</sup>lt;sup>46</sup> Wirral Employment Land and Premises Study 2021, Table 9.3, Page 121.

<sup>&</sup>lt;sup>47</sup> The Wirral Employment Land and Premises Study 2021 viability appraisal outputs were provided to the consultants preparing the Wirral Local Plan CIL and Viability Assessment Study.

4.129. The planning history for each site was assessed looking at historic planning applications on the site to assess potential future delivery.

#### Findings of the site assessment process

4.130. Table 9.1 in the 2021 WELPS sets out the quality of the assessed employment sites and is included below. 40.78% or 63.48ha (net developable area) of the supply was assessed as 'good' or 'very good'. However, 48.50% or 75.49 (net developable area) of the supply was assessed as 'poor' or 'very poor', showing significant development challenges.

Site Class	Number of Sites	Total Area (ha)	NDA (ha)	NDA (%)
Poor / Very Poor	22	89.67	75.49	48.50%
Average	34	46.95	16.69	10.72%
Good / Very Good	25	79.87	63.48	40.78%
Under development	2	4.67	0.00	0.00%
Total	83	221.16	155.66	100.00%

#### Table 9.1: Quality of Employment Sites, Wirral<sup>48</sup>

Source: Avison Young (2021)

4.131. The assessment of potential delivery suggested a good level of early and medium availability, with supply tailing off in the later stages of the Local Plan period as set out in Table 9.2 in the 2021 WELPS and included below:

Table 9.2: Potential Delivery Timescales for Employment Sites, Wirral<sup>49</sup>

Site Class	Number of Sites	Total Area (ha)	NDA (ha)	NDA (%)
0 – 5 years	40	74.12	53.96	34.67
6 – 10 years	16	64.43	61.29	39.37
10 – 15 years	7	48.25	38.76	24.90
Existing Use	18	34.36	1.65	1.06
Total	83	221.16	155.66	100.0

Source: Avison Young (2021)

## 4.132. Chapter 10 of the 2021 WELPS sets out the study's conclusions and recommendations.

<sup>&</sup>lt;sup>48</sup> Wirral Employment Land and Premises Study, 2021, Table 9.1, Page 120.

<sup>&</sup>lt;sup>49</sup> Wirral Employment Land and Employment Study, 2021, Table 9.2, Page 120.

- 4.133. The study concluded that comparing the employment land demand against the overall portfolio of employment sites reviewed in the study there was a potential significant excess amount of supply to cater for the demand of 49 ha.<sup>50</sup>
- 4.134. However, the study noted that within the assessed supply sites provided a mix of quality and had greater and lesser challenges for delivery, with some sites not currently vacant, under development or already benefiting from planning permission for industrial/ businesses uses. In addition, it was noted that some of the more difficult sites might not come forward in the Local Plan period. These sites would not normally be proposed for inclusion in a deliverable employment land supply for allocation in a Local Plan.
- 4.135. The study also noted that it is important not to over-allocate land in areas with plentiful supply as this creates the risk of diluting the market and leaving land vacant which could come forward for alternative uses. Furthermore, any excess demand may be accommodated through intensification of use on existing or new development sites.
- 4.136. With this in mind it was recommended that particular focus should be given to the sites with an overall rating of 'Good' and 'Very Good' in the analysis as these were considered to be the sites which could most readily come forward. There were 63.5 ha NDA of sites rated as 'Good' or 'Very Good', still higher than the 49 ha of demand. This indicated that no 'Average', 'Poor' or 'Very Poor' sites would be required to deliver the required levels of employment development over the Local Plan period. The study concluded that, in fact, not even all of the 'Good' sites would be required and consideration could be given to the release of certain sites for alternative uses, where appropriate.
- 4.137. Furthermore, based on the detailed analysis of the 'Good' and 'Very Good' sites<sup>51</sup> undertaken as part of the study, all these sites were located in three sub-areas: Wirral Waters, Birkenhead and Bromborough. This highlighted a potential reliance on just two locations given that Wirral Waters is effectively part of Birkenhead which should be considered as part of the strategy for allocation or release of employment land.
- 4.138. In terms of the strategy for allocation of employment sites, the study recommended that this should be on the basis of the following overarching principles (with other considerations also noted<sup>52</sup>):
  - 1. Protection of highest quality sites for employment development
  - 2. Protection of employment sites in secondary locations.

<sup>&</sup>lt;sup>50</sup> Wirral Employment Land and Premises Study 2021, Paragraph 10.6.

<sup>&</sup>lt;sup>51</sup> Wirral Employment Land and Premises Study, 2021, Appendix 6.

<sup>&</sup>lt;sup>52</sup> Wirral Employment Land and Premises Study 2021, Paragraph 10.14.

- 4.139. The study sets out in detail in Chapter 10 the recommended approach to allocation of employment sites based on these two principles, as well as consideration of other sites. Paragraph 10.27 in the study sets out the overall classification of each of the sites assessed based on the principles (and other considerations) set out above. Table 10.2 in the study summarises the site by site categorisation of each site assessed in the WELPS<sup>53</sup>. The site categories, numbers of assessed sites in each category and the net developable area (ha) for each category are listed (see Table 10.2 for further details):
  - 1. Highest quality sites to be allocated for employment. 7 sites identified in this category. Total net developable area 26.18 ha.
  - 2. Good quality sites to be considered for employment allocation upon review of other evidence. 13 sites identified in this category. Total net developable area 35.02 ha.
  - Sites in secondary locations to be considered for allocation for employment to provide a spread of employment sites across the Borough. 6 sites identified in this category. Total net developable area 20.54 ha.
  - 4. Strategic lower quality sites to be allocated for employment. 1 site identified in this category. Total net developable area 1.80 ha.
  - 5. Employment land portfolio sites to be included in the general employment land portfolio. 45 sites identified in this category. Total net developable area 67.87 ha.
  - 6. Remove from employment land supply sites to be taken out of the employment land supply. 8 sites identified in this category. Total net developable area 4.25 ha.
- 4.140. The conclusions of the 2021 WELPS were fed into the Stage 2 Planning Site Assessment.

## Stage 2 - Planning Assessment of sites (Delivery), April 2020 to February 2022

4.141. The Stage 1 Planning Site Assessment provided the baseline for Stage 2 of the Planning Site Assessment. This next phase considered each site in further detail and was an iterative process with the assessments updated as evidence studies were finalised.

<sup>&</sup>lt;sup>53</sup> A full list of the categorisation of each site in included in Appendix 5 of the Wirral Employment Land and Premises Study 2021.

- 4.142. Stage 2 considered the following areas in more detail:
  - Sustainable Transport and Highways;
  - Infrastructure;
  - Viability;
  - Flood risk;
  - Air quality; and
  - Issues related to the practical delivery of the site.
- 4.143. The findings of the following studies/ consultations informed the site assessments listed above:
  - a. Wirral Local Plan Transport Assessments:
    - A Transport and Access review has been undertaken, of the potential housing sites of over 50 dwellings and employment site allocations, to identify the transport requirements to ensure access can be achieved to sites by all modes. This has been ratified by Wirral Council Highways Officers and Merseytravel.
    - A cumulative impact assessment has been undertaken using the Wirral Traffic Model to consider traffic changes associated with potential housing and employment allocations together with any committed network updates.
  - b. Wirral Infrastructure Delivery Plan:
    - Infrastructure capacity implications of housing sites of over 50 dwellings and large employment site allocations have been assessed in partnership with key stakeholders, site promoters/ developers, infrastructure providers, and through interdepartmental working with Wirral Council colleagues. Assessments include utility requirements and education, health, and emergency service needs.<sup>54</sup>
  - c. Wirral Local Plan CIL and Local Plan Viability Study.
    - The conclusions of the Wirral Local Plan CIL and Viability Study were fed into the Stage 2 Planning Site Assessment.
  - d. Wirral Level 1 Strategic Flood Risk Assessment (SFRA), Wirral Level 2 SFRA, and the Wirral Local Plan Flood Risk Sequential and Exception Test paper:
    - The 2019 Level 1 SFRA informed the suitability assessment in the 2019 SHLAA. The Level 1 SFRA was updated in 2021 and along with the Level 2 SFRA fed into the 2021 SHLAA. The conclusions of the Flood Risk Sequential and Exception Test<sup>55</sup> were fed into the Stage 2 Planning Site Assessment.

<sup>&</sup>lt;sup>54</sup> Wirral Infrastructure Delivery Plan, Chapters 6, 7 and 8.

<sup>&</sup>lt;sup>55</sup> Wirral Local Plan Flood Risk Sequential and Exception Test paper.

- e. Wirral Air Quality Study:
  - The effects on local air quality resultant from Local Plan development allocations were predicted using screening model methods for the whole district, and for five discrete areas using detailed dispersion modelling.<sup>56</sup>
- f. Phase 1 Ground Contamination Reports for potential allocations.
- g. Review of Current Waste Management Facilities and Historic Waste Sites at or close to potential allocations and broad locations.
- 4.144. The Stage 2 Assessment also included considering the representations received to the Regulation 18 Issues and Options consultation including site specific comments received from statutory bodies, infrastructure and service providers, community groups, local residents/ businesses and the public and ongoing engagement with relevant landowners/ developers with regard to emerging policies, infrastructure and site-specific viability.
- 4.145. Only sites that were found to be 'deliverable' or 'developable' within the Plan period have been included in the future housing land supply in the Regulation 19 Local Plan Submission Draft.
- 4.146. In deciding the sites to be allocated for employment development, in addition to considering findings of the 2021 WELPS and the other studies listed above, the following matters were also taken into account:
  - A focus on sites which were not in active use for employment;
  - Exclusion of sites which had been developed since the Regulation 18 Issues and Options and those sites proposed for allocation for other uses such as residential;
  - Balancing provision between the market areas as reviewed in the 2021 WELPS to safeguard provision of employment land in areas other than Birkenhead and Bromborough;
  - Future requirements of Peel Ports in relation to their land holdings adjacent to the Twelve Quays Ro-Ro Terminal and in the West Float of Birkenhead Docks, including the need to accommodate potential relocation of businesses from East Float to facilitate residential development at Vittoria Studios;
  - Discussions with landowners and site promoters;
  - Progress with securing grant funding;

<sup>&</sup>lt;sup>56</sup> Wirral Local Plan Air Quality Study, Chapters 9 and 11 and Appendices A, E, F and G for details.

- Implications of the Birkenhead 2040 Framework including the potential need for business relocations; and
- Implications of the new Use Class E.
- 4.147. In November 2020 a high-level appraisal of the housing and employment urban site options was undertaken by AECOM as part of the preparation of the Sustainability Appraisal and provided to the Council for iterative purposes. This appraisal is set out in Chapter 7 and Appendix E of the Submission Draft Local Plan - Sustainability Appraisal report. The key positive and negative effects identified for each site in the appraisal were fed into the Stage 2 Planning Site Assessment.

#### Step 3 – Preferred Choice

4.148. Step 3 of the housing and employment site selection process was an iterative approach using the refined shortlist from the second stage of Step Two to develop a preferred choice taking into account delivery and the work undertaken to identify the housing and employment land need over the Plan period. This step included appraisal of the proposed allocations and broad locations as part of the Sustainability Appraisal of the Submission Draft Local Plan <sup>57</sup>.

<sup>&</sup>lt;sup>57</sup> Wirral Local Plan: Submission Draft – Sustainability Appraisal Report.



This document has been produced by the Director of Regeneration and Place, Wirral Council, PO Box 290, Wallasey CH27 9FQ

For enquiries please email **localplan@wirral.gov.uk** 





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