

1. BACKGROUND

ID	Comment Received	Recommended Response
27, 48, 90	Supporting text should make specific reference to NPPF paragraph 47 on the need to “boost significantly the supply of housing” and to Footnotes 11 and 12 on the definition of “deliverable” and “developable” sites.	NPPF paragraph 73 is now referred to in paragraph 1.4 and the definition of “deliverable” and “developable” in paragraph 2.7 of the SHLAA 2019
69	Supporting text should make specific reference to NPPF paragraph 158, on up-to-date evidence; paragraph 159, on the preparation of the SHLAA; paragraph 47, to boost significantly the supply of housing; and to Footnotes 11 and 12 on the definition of “deliverable” and “developable”.	NPPF paragraph 59 is now referred to in paragraph 1.5, NPPF paragraph 73 in paragraph 1.4 and the definition of “deliverable” and “developable” in paragraph 2.7 of the SHLAA 2019

Future Changes in National Policy

ID	Comment Received	Recommended Response
465	Question the value of this revision given that City Region will be considering a SHELMA in the near future.	The calculation of local housing need has been overtaken by the standard method in national planning guidance (NPPF, paragraph 60 refers) and is reflected in Table 2.7 of the SHLAA 2019
466, 603	Question the value of this revision given the changes to the NPPF proposed in the recent Housing White Paper.	The revisions to NPPF and PPG are now reflected in the SHLAA 2019

Evidence Base

ID	Comment Received	Recommended Response
32, 53, 73, 95	The evidence used to inform the site-specific criteria and assumptions is out-of-date. An updated employment land study and playing pitch strategy should inform the final methodology.	The SHLAA 2019 has been based on evidence available at April 2019 including the findings of the Council’s Playing Pitch Strategy Update 2016 and the Employment Land and Premises Study Update 2017. A further review of employment land will be published for public consultation in January 2020.
47, 67, 78, 103	The Council should have updated the Economic Viability Study before the revised methodology was published, because it is reliant on a number of assumptions which may change.	The SHLAA 2019 has been based on the findings of the Council’s Development Viability Baseline Update 2018

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ID	Comment Received	Recommended Response
491, 504, 517	Support a comprehensive review of the Borough's employment land and premises.	The SHLAA 2019 has been based on the findings of the Council's Employment Land and Premises Study Update 2017. A further review of employment land will be published for public consultation in January 2020.
534	The Council's SHLAA and the LCR SHELMA should be prepared to provide a consistent approach to assessing land supply.	The calculation of local housing need has been overtaken by the standard method in national planning guidance (NPPF, paragraph 60 refers) and is reflected in Table 2.7 of the SHLAA 2019
535	Whilst broadly supporting the Council's methodology, assessments of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land.	The SHLAA 2019 has been based on the findings of the Council's Employment Land and Premises Study Update 2017. A further review of employment land will be published for public consultation in January 2020.

2. METHODOLOGY

Inclusion of Sites

ID	Comment Received	Recommended Response
28, 49, 70, 91	Sites should be discounted where planning permission has lapsed where there is no evidence of a willingness to see those sites developed.	Paragraphs 2.64 to 2.66 now refer
30, 51 93, 72	It is not clear whether urban open space not in active recreational use will be suitable for housing, which should be informed by a comprehensive Borough wide review of open space provision and requirements.	The approach to open space is set out in Table 2.1 of the SHLAA 2019. A review of open space will be published for public consultation in January 2020.
31, 52, 94	Welcome the commitment to re-assess sites which remain undeveloped against the revised SHLAA methodology.	Support noted.
29, 50, 71, 92	Sites identified by public sector partners for future disposal must be genuinely deliverable, particularly where no firm resolution to dispose has been recorded.	Only sites that have been identified as 'deliverable' or 'developable' have been included in the housing trajectory in the SHLAA 2019

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ID	Comment Received	Recommended Response
172, 417, 574	It is not sufficient to state that the Council must consider a wide range of land without clearly identifying on what basis the land is being considered and which specific policy requirement is being addressed by considering the land in question.	The policy basis of the SHLAA is set out in national policy and guidance, driven by the standard method for assessing local housing need set out in NPPF paragraph 60
185	It is essential that the SHLAA considers a comprehensive range of sites as far as possible without screening out potential sites.	Noted. Paragraph 2.2 of the SHLAA 2019 now refers
411	Concerned about housing development being proposed on Green Belt land; agricultural land; land with nature conservation value; and land with access and infrastructure or drainage and water supply constraints.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
415, 572	It is not appropriate to revise the methodology to include areas of land offered by a landowner which cannot be developed due to current planning restrictions.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
421, 578	The SHLAA fails to include sufficient reasons for particular proposals, such as why certain land is being considered, how it came to be considered and what need is being addressed by the inclusion, which prevents intelligent consideration of the extent of each of the categories and how the land will be dealt with within the Local Plan.	The policy background is set out within paragraph 1.3 and following of the SHLAA 2019
468	In paragraph 3.3, the significant contribution of small sites to the Wirral housing land supply would surely imply a <i>mode</i> of one unit.	Paragraph 2.1 of the SHLAA 2019 now refers
536	Support the inclusion of sites that are no longer considered viable for employment but employment allocations which are considered to have a reasonable prospect of re-use should be excluded, to avoid the loss of viable employment sites.	The SHLAA 2019 has been based on the findings of the Council's Employment Land and Premises Study Update 2017
667	Undeveloped sites in the Green Belt should continue to be excluded from the calculation of future land supply.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
670	The capacity of Wirral Waters should be addressed with complete clarity in the SHLAA. The SHMA/SHLAA Cabinet Report only indicates 1,000 dwellings.	Further information on Wirral Waters is provided in Table 2.6 of the SHLAA 2019
677	A minimum site threshold of 5 dwellings should be applied as small sites will be picked up as windfalls.	A minimum site threshold has not been applied. Paragraph 2.1 of the SHLAA 2019 refers

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ID	Comment Received	Recommended Response
678	It should not be assumed that that all sites approved subject to signing of a s106 agreement or undeveloped site allocations from the Unitary Development Plan will come forward.	Only sites that have been identified as 'deliverable' or 'developable' have been included in the SHLAA 2019 housing trajectory

Site Assessment - General

ID	Comment Received	Recommended Response
156	Sites along the Dee coast should be classed in the proposed Category 4.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
176, 177, 422, 579	The consultation provided no detail on the creation of the Local Plan or on the intentions for land that is categorised as falling within each of the categories. The Consultation suggests that the Council will have the ability to bring forward development despite any specific categorisation but is silent on the circumstances that could allow this. Please explain the effect of including land with a theoretical categorisation and the powers of the Council to review current planning restraints to such land in the future.	Paragraphs 1.9 and 1.10 refer. The inclusion of sites for allocation for development in the Council's Local Plan and the determination of planning applications are separate decisions, based on all the available evidence, including the need for additional development and national policy. Proposed allocations are subject to statutory public consultation before adoption.
237	Welcome the inclusion of Category 4, particularly in relation to national and international nature conservation designations and supporting habitat, to enable sites to be transparently excluded from the assessment.	The approach to biodiversity is now set out in Table 2.1 of the SHLAA 2019
525	Regardless of the scoring criteria, the Council must formally acknowledge that evidence can be considered by the Council that may require them to amend the scoring of a particular site.	A scoring system is no longer used. Each site is now assessed for its suitability, availability and achievability based on professional judgement, subject to public consultation
587	If a site is classed as unsuitable it should not be tested for availability and achievability.	Only sites that have been identified as suitable have been included in the SHLAA 2019 housing trajectory
669	All sites excluded from the calculation of future land supply, including undeveloped sites in the Green Belt, should be in one grouping, with the application of 'identifiers' which indicate the reason for exclusion.	The final categorisation of sites is summarised in Table 2.5 of the SHLAA 2019. Further information on each site is provided in Appendix 3 and Appendix 4.

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Site Scoring Criteria - Suitability

ID	Comment Received	Recommended Response
74	Information from the Environment Agency on flooding can often be inaccurate and not site-specific. The Council should produce an up-to-date Strategic Flood Risk Assessment to inform their assessment of flood risk.	The SHLAA 2019 has been based on the findings of the Council's Strategic Flood Risk Assessment 2019
158	People living in crowded urban areas have the right to accessible playing/recreational fields. Any 'surplus' is caused by the lack of interest from Wirral Council and schools not promoting recreational spaces.	The SHLAA 2019 has been based on the findings of the Council's Playing Pitch Strategy Update 2016
178, 424, 438, 581	The specific issues of wildlife preservation, conservation, infrastructure, coastal plains preservation, detriment to the natural environment and destruction of Green Belt in specific areas should be addressed prior to the drawing up of a Local Plan.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
183	Accept that adopted planning policy and emerging planning policy are valid considerations but they should not prevent sites from being considered within the SHLAA, as many of these policies can be overcome and mitigated against.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
186	An area can be used for agricultural/horticultural uses but not contain high grade agricultural land. A further distinction should be made, in addition to sites with Grades 1, 2 or 3a land.	The approach to agricultural land is set out in Table 2.1 of the SHLAA 2019
187	The methodology should be in accordance with national guidance on acceptable walking distances. The Institution of Highways and Transportation (IHT) 'Providing for Journeys on Foot' provides a range of suggested acceptable and preferred maximum walking distances. The focus on existing centres or high-frequency public transport corridors, ignores other important individual facilities and services.	Distances of 400 and 600 metres have been used to identify the most accessible areas (Appendix 1 refers)
196	Welcome paragraphs 3.43 to 3.48 on heritage assets but heritage assets and their setting can also be affected by development that is not within or adjacent to the site. Each site will need to be considered on their own merit.	The approach to heritage assets is set out in Table 2.1 of the SHLAA 2019

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200	The assessment of impact on nature conservation is too simplistic and may lead to suitable sites being overlooked. Criteria should have regard to the potential impact on a designated/protected area, rather than merely proximity to it.	The approach to biodiversity is set out in Table 2.1 of the SHLAA 2019
201	The assessment of flood risk is too simplistic and fails to identify whether the potential for flooding is a significant risk to the development of a site and whether this can be adequately mitigated. The identification of 'critical drainage problems' must be substantiated and should not be based upon strategic level flood risk mapping only.	The approach to drainage and flood risk is set out in Table 2.1 of the SHLAA 2019
238	There is no reference to landscape character, which should be considered as set out in national planning guidance.	Issues related to visual impact will determined at land allocation or planning application stage, when a detailed proposal is being considered
239	The section on recreation does not make any reference to long distance recreation routes, such as the Wirral Way, which should be included within the recreation suitability criteria or as part of an additional set of suitability criteria.	Public rights of way have been included in the list of evidence used in the assessment (Appendix 1 refers)
349	Consider that the sites proposed in the SHLAA have not been adequately assessed for their impact on the historic environment, and with particular regard to non-designated heritage assets.	The approach to heritage assets is set out in Table 2.1 of the SHLAA 2019
350	The proposed methodology does not conflict with the Merseyside and Halton Joint Waste Local Plan. Site surveys should record nearby waste sites and 'impacts on adjoining uses' (Table 3.11) should address potential issues/constraints arising from nearby waste facilities.	The approach to hazards and risk is set out in Table 2.1 of the SHLAA 2019
351	Minerals infrastructure should also be taken into account in terms of constraints when undertaking the SHLAA methodology.	Minerals safeguarding has been included in the list of evidence used in the assessment (Appendix 1 refers)
352	The ground conditions suitability criterion is very simplistic. A higher score is applied for those sites which have not been developed nor require treatment. There is no consideration of former uses which could have a significant impact on the likely need for treatment in terms of timeframe, scale and cost.	The approach to ground conditions is set out in Table 2.1 of the SHLAA 2019

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425, 582	The Coastal Zone, prime arable land within the Dee Estuary Ecological Designations, The Wirral Way, Sites of Special Scientific Interest and Special Protection Areas should not simply be eroded by the potential circumvention of current development restraints, at the request of developers and landowners.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
454	The proposed methodology does not align with public transport policy. Any release of land should be after a commitment to improved public transport in the area (e.g. tram/electrification of Bidston line)	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019
470	Sites not containing housing, which were demolished under the "Newheartlands Pathfinder" scheme, must be considered free of ground condition constraints.	The approach to ground conditions is set out in Table 2.1 of the SHLAA 2019
471	Welcome the consideration of the impact from flood risk, since the Environment Agency has dramatically redrawn its flood maps.	Support noted. The approach to flood risk is set out in Table 2.1 of the SHLAA 2019
487, 500, 513	Support consideration of Neighbourhood Plans as it ensures that all local planning policy is taken into consideration when considering what sites are suitable and most preferable to facilitating housing development.	Support noted. Only sites that have been identified as suitable have been included in the SHLAA 2019 housing trajectory
488, 501, 514	Protecting open spaces that are not designated for protection seems restrictive and does not consider the environmental quality of each site.	Only sites that have been identified as 'deliverable' or 'developable' have been included in the SHLAA 2019 housing trajectory. The approach to recreational land is set out in Table 2.1 of the SHLAA 2019
489, 502,515	Support the changes within Table 3.4 'Impact on Employment Land' of the Proposed Revised Methodology	The approach to employment land is set out in Table 2.1 of the SHLAA 2019
490, 503, 516	Sites that are or have been used for industrial or large- scale commercial enterprise should not be included given the shortfall in the employment land supply.	The approach to employment land is set out in Table 2.1 of the SHLAA 2019
492, 505, 518 529, 530	Criteria for agricultural land should not be included. Automatically applying a score of '0' regarding the Impact on High Quality Agricultural Land in the absence of further information will mean that landowners or potential developers would be incurring considerable costs if they intended to obtain a higher score.	The approach to agricultural land is set out in Table 2.1 of the SHLAA 2019

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527, 528	A new criterion should be added in Table 3.3 'Impact on Nature and Earth Science Conservation Assets', to assess the potential of a site to provide improved/enlarged nature conservation areas and increase biodiversity.	The approach to geological assets is set out in Table 2.1 of the SHLAA 2019
531	Table 3.12 'Transport Accessibility' should be split into two, one to cover accessibility to centres and the other to cover accessibility to public transport, with a revised scoring mechanism.	Distances of 400 and 600 metres have been used to identify the most accessible areas (Appendix 1 refers)
537	The assessment of suitability should have full regard as to whether any perceived adverse impact would significantly and demonstrably outweigh the benefits of bringing the site forward for housing.	The SHLAA 2019 is a high-level assessment of the suitability, availability and achievability of potential sites for future housing development. The test of significantly and demonstrably outweighing the benefits applies to the Local Plan and to the determination of planning applications in national policy
538	Further consideration should be given as to whether any identified constraints could be overcome through the development management process and/or secured through planning obligations.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
545	The methodology does not consider the availability of local schooling or the availability of places within the schools. Schooling is a principal consideration for the majority of house purchasers especially in the lower cost market and therefore should be considered in the point scoring system.	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019. School capacity will be considered as part of the infrastructure development plan prepared alongside the Council's Local Plan.
546	The methodology does not include an engineering review of all of the traffic routes and junctions that would/could be affected by increased traffic flows.	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019. More detailed transport modelling and assessment would be undertaken at land allocation and planning application stages.
547	In some areas upgrades to high speed broadband systems will be difficult and expensive to install because of the high occurrence of shallow sandstone bedrock, which should be included in the scoring and made subject to prior consultation with the telecom companies whom may have limits on their future allocated capital cost expenditure.	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019. More detailed requirements would need to be considered at the land allocation and planning application stages.

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548	The criteria for 'Bad Neighbours', in Table 3.11, should include the impact of providing social housing on sites.	Although the land use and character of the surrounding area is a consideration in site assessments (paragraph 2.3 of the SHLAA 2019 refers), social housing is not considered to be a development constraint
549	The criteria for drainage and flood risk do not seem to comply with "SUDS".	The approach to drainage and flood risk is set out in Table 2.1 of the SHLAA 2019. A more detailed policy will be included in the Council's Local Plan.
604	It is inappropriate to score sites against historic UDP policies, given that the SHLAA will support site allocations in a new Local Plan produced under an updated national planning policy regime.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019.
607	Broadly support the criteria in Table 3.2 'Impact on Recreational Open Space' but there is no justification for giving the same score to designated and non-designated open spaces. Non-designated spaces should achieve a maximum score.	The approach to recreational land is set out in Table 2.1 of the SHLAA 2019.
608	An additional score of 4 should be awarded to sites adjoining a key nature / wildlife conservation area, in Table 3.3 'Impact on Nature and Earth Science Assets', to differentiate them from sites that partially contain such an area.	The approach to biodiversity assets is set out in Table 2.1 of the SHLAA 2019.
609	Do not agree that any part of a site located within a national or international designation should necessarily be placed in Category 4. Likewise, at paragraph 3.34, we do not agree that 'supporting habitat' to designated European Sites should automatically be placed in Category 4. Such sites may be suitable for development subject to appropriate mitigation measures, so we suggest that they should be assessed in line with Table 3.3.	The approach to biodiversity assets is set out in Table 2.1 of the SHLAA 2019.
610	Broadly support the criteria in Table 3.4 'Impact on Employment Land' but a separate higher score should be included for land that has 'previously been used for employment' rather than land 'currently used for employment'.	The approach to employment land is set out in Table 2.1 of the SHLAA 2019.
611	Seek clarification that 'employment' only relates to the B-Class Uses and does not relate to any other uses that may generate jobs.	The approach to employment land is set out in Table 2.1 of the SHLAA 2019.

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612	The scoring system around impact on heritage assets should be amended to take into account the relative importance of heritage assets, perhaps reflecting the differing status of Grade 1, Grade II* or Grade II listed buildings and Scheduled Ancient Monuments.	The approach to heritage assets is set out in Table 2.1 of the SHLAA 2019.
613	Greater flexibility should be introduced, to allow a more nuanced assessment of the relative impact on agricultural land and allow a range of scores between 0 and 3. Agricultural land quality and associated issues would be better considered at the planning application stage.	The approach to agricultural land is set out in Table 2.1 of the SHLAA 2019
614	Support the criteria set out in Table 3.7 relating to access infrastructure.	Support noted. The approach to access and infrastructure is set out in Table 2.1 of the SHLAA 2019
615	Drainage and water supply constraints should refer to existing infill villages, which might achieve a maximum score if they benefit from suitable provision. The Council should clarify what it means by 'drainage and water supply infrastructure' and whether the Council has undertaken a Borough-wide assessment of existing infrastructure.	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019
616	There should be greater flexibility in assessing ground condition constraints, so as not to prejudice sites requiring demolition.	The approach to ground conditions is set out in Table 2.1 of the SHLAA 2019
617	Suggested amendment to assessing flood risk to allow sites containing small elements of Flood Zones 2 and 3 to achieve the maximum score and clarification on 'critical drainage problems'. Suggest that the scoring methodology be amended to enable a score of 5 to be achieved where the site is mainly within Flood Zone 1, with any detailed drainage strategy to be formulated at the planning application stage.	The approach to drainage and flood risk is set out in Table 2.1 of the SHLAA 2019
618	Are the details regarding drainage issues are publicly available and what matters constitute 'critical drainage problems' to prevent sites in Flood Zone 1 from attaining the highest score?	The SHLAA 2019 has been based on the findings of the Strategic Flood Risk Assessment 2019
619	Support the criteria set out in Table 3.11 'Impact on Adjoining Uses'.	Support noted.
620	The criteria in Table 3.12 'Accessibility' do not specify where the distance will be measured from (e.g. entrance of the site or from within the site (e.g. from the centre). Proximity to smaller villages, which may also contain local shops and services, should also be considered.	Distances of 400 and 600 metres have been used, with a buffer drawn from the edge of the site

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621	It may not be appropriate to base the scoring upon Policy CS2 of the draft Core Strategy, which will be revisited as part of the emerging Local Plan process.	Only site density has currently been based on Policy CS2, paragraph 2.33 of the SHLAA 2019 refers
622	There is no explanation why over 44 points is a 'cut-off' for achieving the maximum suitability score of 3/3, and likewise for 33 points.	A site scoring system is no longer used. Only sites which are identified as 'deliverable' or 'developable' as defined in the NPPF Glossary are included in the SHLAA 2019 housing trajectory
643	Support the criteria set out in Table 3.2 (Impact on Recreational Open Space) and paragraphs 3.22 to 3.27. The proposal to revise the criteria to recognise recreation facilities on un-designated sites and to use the Playing Pitch Strategy Update is also welcomed.	The approach to recreational land is set out in Table 2.1 of the SHLAA 2019
652	The Draft SHLAA methodology should be updated to reflect an assessment of the relevance of UDP policies.	The approach to potential constraints is set out in Table 2.1 of the SHLAA 2019
654	The identification of infrastructure constraints should not mean that land is considered less suitable for development in principle.	The approach to infrastructure is set out in Table 2.1 of the SHLAA 2019
663	Solid and drift geology, water-course patterns and flood-risk areas should also be taken into account.	The approach to drainage and flood risk and to ground conditions is set out in Table 2.1 of the SHLAA 2019
137, 671	Support addition of Table 3.6 'Impact on High Quality Agricultural Land'.	The approach to agricultural land is set out in Table 2.1 of the SHLAA 2019
680	Sites in Primarily Industrial Areas should be given the same score as Employment Allocation and sites currently in employment use should only score 1.	The approach to employment land is set out in Table 2.1 of the SHLAA 2019
681	Sites containing entirely high-quality agricultural land should be given a score of 1 whereas sites with only some high-quality agricultural land should be given a 2 and that other grades of agricultural land should be given 3. The Council should also be prepared to split sites to assess more accurately.	The approach to agricultural land is set out in Table 2.1 of the SHLAA 2019

Site Scoring Criteria – ‘Availability’

ID	Comment Received	Recommended Response
35, 55, 76, 97	In relation to “has been the subject of a recent planning application”, it remains unclear if this refers to sites with current planning permission, expired planning permission, or an application which has been refused or withdrawn. Clarification is required on what constitutes “recent.”	Sites with planning permission are not assessed as part of the SHLAA but are included in the land supply calculation. Paragraph 2.23, 2.27 and 2.64 refer
36	Clarification is required in relation to sites with “resolution for disposal”, what date the resolution to dispose applies from, and what evidence is required to confirm this.	Paragraph 2.79 of the SHLAA 2019 now refers
37, 56, 99	The Council has also failed to provide clarity in relation to “sites which are vacant and are otherwise available for new development”.	Paragraphs 2.15 and 2.16 of the SHLAA 2019 now refer
202	Support the approach to scoring the ‘availability’ of sites.	Support noted
228	Did the Call for Sites verify that the people who responded actually owned the land they were offering?	Yes
539	Whilst a planning application may provide an indication that a site is available, further consideration should be given to who the applicant is and the likelihood that the application will be implemented.	Paragraph 2.41 and following and paragraphs 2.17 and 2.18 of the SHLAA 2019 now refer
540	At present, the Council’s methodology does not differentiate the availability of a site being promoted by a developer with a proven track-record of delivery and a landowner who wishes to see their land developed, but with little or no experience of development. The scoring criteria under Table 3.13 should be revised accordingly.	Paragraphs 2.15 to 2.18 of the SHLAA 2019 now refer
541	Supports paragraph 3.83 which sets out that where a site is within single or multiple ownership but is held by a developer, willing owner or public sector body with the intention of disposal for development, the site will be assigned an overall availability score of 3.	Support noted
623	Support approach to assessing market interest	Support noted.
624	Support approach to assessing site ownership	Support noted.
682	Single ownership sites with a single contracted developer should score a 5 while sites with multiple owners/developers should score a 3.	A scoring system is no longer used. Only ‘deliverable’ or ‘developable’ sites have been included in the SHLAA 2019 housing trajectory

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683	With regard to the assessment of site ownership, consider that the scores should be 5, 3, 1 and 0. Some established uses are difficult to remove hence a score of 1 would be more appropriate.	A scoring system is no longer used. Paragraph 2.16 of the SHLAA 2019 now refers
684	Sites subject to several land ownerships should score less than those in the same ownership unless there is clear evidence of collaboration agreements. Land subject to option agreements are readily available and should score 5.	Noted. Only 'deliverable' or 'developable' sites have been included in the SHLAA 2019 housing trajectory

Site Scoring Criteria – 'Achievability'

ID	Comment Received	Recommended Response
38, 57, 100	No clarification has been provided as to what is meant by "achievability constraints". Additionally, there is no certainty in the information provided by developers that the sites will be developable.	Paragraph 2.19 and following of the SHLAA 2019 now refer
159	Significant weight should be given to the deliverability of development, considering the infrastructure requirements in determining which locations to allocate.	Only 'deliverable' or 'developable' sites have been included in the SHLAA 2019 housing trajectory
542	Significant emphasis should be placed on the track record and capabilities of the developer involved to bring the site forward. Those sites which are being promoted by a Company with the financial capability and experience to deliver a scheme should be considered significantly more achievable than those promoted by others.	Paragraph 2.19 and following of the SHLAA 2019 now refer
543	Whilst some unimplemented consents may be delivered within five years, such assumptions should also be based on sufficiently robust evidence to demonstrate delivery.	Paragraph 2.41 and following of the SHLAA 2019 now refer
625	Support approach to assessing achievability.	Support noted.
626	Although we offer broad support to the scoring of sites with planning permission it is unclear as to how the scoring will be used in determining the overall score of sites.	A scoring system is no longer used. Only sites which are identified as 'deliverable' or 'developable' as defined in the NPPF Glossary are included in the SHLAA 2019 housing trajectory

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655	The Viability Assessment typically assumes that greenfield land has a lower land value than brownfield land on the basis that greenfield land is at present subject to additional planning policy constraints. It does not reflect current market conditions and it will be significantly older at the point at which the emerging Local Plan reaches examination.	The SHLAA 2019 has been based on the findings of the Council's Development Viability Baseline Update 2018
685	Consider that a higher score for land availability should weigh in favour of scoring of viability.	Sites have continued to be assessed separately for suitability, availability and achievability, as the availability of a site does not automatically mean a site will be economically viable.

Calculation of Site Capacity

ID	Comment Received	Recommended Response
39, 58, 79,101	Support use of officer site visits to help assess permanent features	Support noted
40, 59, 80, 102	The assumption that all developments over 2 ha will be delivered at a 75% net developable area is not realistic – particularly when taking into account open space standards, infrastructure, potential flood mitigation and ecological impact. An additional category for sites over 10ha should be included, at a rate of 70% net developable area.	Paragraph 2.30 and Table 2.2 of the SHLAA 2019 now refers
41, 60, 104	The Council is also seeking to apply a 50 dph for sites “within areas of greatest need or within an easy walking distance of an existing centre or high frequency public transport corridor”. Whilst the Council has clarified what they mean by this distance, the footnote that has been referenced within their response is incorrect and does not correlate with the SHLAA Update.	The approach to density is set out in paragraph 2.31 and following of the SHLAA 2019
81	Our Client is generally supportive of the density assumptions set out within 5.13 to 5.15 of the methodology in the absence of an up-to-date Local Plan and Baseline Viability Study.	Noted. Paragraph 2.26 and following of the SHLAA 2019 now refers

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197	Paragraph 2.48 makes reference to density, particularly the need to reduce density where sites can affect heritage assets. Density is not the only element of a development proposal which can mitigate the harm to a heritage asset and its setting therefore this paragraph should be amended to reflect this.	The approach to heritage assets is set out in Table 2.1 of the SHLAA 2019
493, 506, 519	We generally support the Council's intention to maximise development potential on suitable sites within urban areas, acknowledging the fact that developers are often forced to increase housing densities on sites which are in difficult to market areas and areas of the greatest need in terms of economic regeneration.	Noted
687	A density of 30 dph should be applied, partly to improve living conditions in densely populated urban area.	The approach to density is set out in paragraph 2.31 and following of the SHLAA 2019

Build Out Rates

ID	Comment Received	Recommended Response
42, 61, 83, 105	No differentiation has been provided between sites with full or outline permission, the latter of which would require a reserved matters application. This needs to be addressed as part of the proposed lead in times and build out rates.	Paragraph 2.36 and following of the SHLAA 2019 now refer
43, 62, 106	The Council need to ensure that the implications of greater competition on delivery rates is given due consideration, because this could dampen the rate of sales.	Noted. Paragraph 2.36 and following of the SHLAA 2019 now refer
44, 63, 86, 107	No clarification has been provided by the Council as to what "construction" means and if this refers to the first implementation of site preparation, installation of roads and utilities, the starting of dwellings, or the completion of dwellings. Lead in times must refer to the completion of new dwellings, and the word "completion" must mean complete with NHBC sign off.	Paragraph 2.36 and following of the SHLAA 2019 now refer
45, 64, 87, 108	Consider that the sale of houses commences earlier than that proposed, as many potential house-buyers purchase "off-plan" prior to the construction of the houses.	Paragraph 2.36 and following of the SHLAA 2019 now refer

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ID	Comment Received	Recommended Response
65	Suggests an alternative set of lead times, as follows: For sites of fewer than 50 dwellings, sites with full planning permission/reserved matters would be subject to a 1.5 year lead time; those with outline permission 2 years; and sites without planning permission would be subject to a 2.5 year lead time. For sites of more than 50 dwellings, sites with full planning permission/reserved matters would be subject to a 2-year lead time; those with outline permission 2.5 years; and sites without planning permission would be subject to a 3 year lead time. A further category should be included for sites over 150 dwellings. For these sites, a 4-year allowance should be made for sites without planning permission and 3.5 year allowance for sites with outline planning permission.	Paragraph 2.36 and following of the SHLAA 2019 now refer
82	The assumptions at Table 5.2 of the methodology document cannot be considered robust. Where a housebuilder, landowners and developer can advise on alternative build rate for individual sites, this information should be considered to be more favourable than using assumptions.	Paragraph 2.36 and following and paragraph 2.43 of the SHLAA 2019 now refer
84	Permission obtained by landowners and promoters can often have longer lead-in times as they need to dispose of the site once planning permission has been granted.	Noted
85	No consideration has been given to the instances where two or more housebuilders deliver a single site and the potential to increase the output of units delivered on a site.	Where this is known, a higher figure can be included in the housing trajectory
188	The proposed build out rates do not take account of difficulties in promoting larger sites such as site assembly, infrastructure requirements, land reclamation, time taken from the submission of an application to planning approval, marketing of the site etc. The Council should therefore not be reliant on a fixed assessment should more up-to-date evidence on delivery indicate otherwise.	Paragraph 2.36 and following and paragraph 2.43 of the SHLAA 2019 now refer
688	The build out rates in Table 5.2 exaggerate delivery from sites - sales on larger sites will not take place until longer into the programme as these sites invariably have large infrastructure requirements. Proposes a revised table of build out rates.	Paragraph 2.36 and following and paragraph 2.43 of the SHLAA 2019 now refer

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Windfalls

ID	Comment Received	Recommended Response
46, 66, 88, 109	A thorough assessment of land including Green Belt sites should be undertaken and further land should be released and allocated within the emerging Local Plan. This will in turn reduce the number of windfall sites in the future.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
189, 656	It is essential that the Council's calculation of windfall allowance is robust and justified with respect not only to previous levels of windfall delivery but also to the prospect that they will continue to come forward even when the emerging Local Plan is adopted.	Paragraph 2.47 and following of the SHLAA 2019 now refer
496, 509, 522,533	Consider the proposed approach towards windfalls is effective as it avoids double counting sites as most, if not all, will be delivered in years 1 and 2 will already have planning permission.	Noted
689	Windfalls sites should not be included in the SHLAA; the purpose of which should be to assess known sites.	An assessment of windfalls is included in the land supply calculation. Paragraph 2.47 and following and Table 2.7 of the SHLAA 2019 now refer

Assessment of Sites in the Green Belt

ID	Comment Received	Recommended Response
33	The scoring approach to Green Belt sites will have the effect of neutralising the ability of the SHLAA to properly assess the suitability of Green Belt Sites because they will all score '0' overall in terms of suitability.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
54	We consider that given the policy constraints that exist within the Wirral that a Borough-wide Green Belt assessment should be undertaken. Green Belt release is essential to meet future housing needs in the Borough.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.

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ID	Comment Received	Recommended Response
75	We object to all Green Belt sites scoring '0' in terms of suitability. This will effectively nullify the ability of the SHLAA to properly assess the suitability of Green Belt sites. Green Belt land should only be released in exceptional circumstances, however, believe it to be fundamental to the soundness of the Local Plan that a review of the Green Belt is undertaken to meet the Borough's future housing need.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
170	It is important that the score of Green Belt sites in the SHLAA should not be used solely to determine site allocations e.g. Green Belt sites could be suitable for development.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
199	Paragraph 3.15 - Suitability Criteria - Impact on Green Belt. Whilst it is recognised that some factors may require an increased weighting in terms of potential impacts on certain criteria, the insertion of this clause does not allow for a fair assessment of sites in the context of demand for housing land, and the fact that a review of designated Green Belt is likely to be required. We suggest that the criteria relating to Green Belt ought not to be marked by an asterisk to allow a fair assessment of which sites are most suitable for development.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
203	Our client welcomes the intention to assign a 'theoretical category' to Green Belt sites, however, the way the overall scoring system is weighted, and the fact that sites in the Green Belt are only able to score a maximum of 1 for 'suitability', means that Green Belt sites are incapable of being scored in Categories 1 and 2. Green Belt sites should no longer be restricted to a score of 1 for 'suitability'.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
209	Strongly supports the revised approach to scoring previously undeveloped sites in the Green Belt	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
389	It is at the stage of assessment, prior to the drawing up of a Local Plan that the specific issues of wildlife preservation, conservation, infrastructure, coastal plains preservation, detriment to the natural environment and destruction of Green Belt in specific areas should be addressed.	A detailed review of the Green Belt will be published in January 2020. Further specialist studies will be necessary to comply with national policy before any final decisions are taken.

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ID	Comment Received	Recommended Response
410	If the Council are serious about protecting Green Belt land then undeveloped sites in the Green Belt should automatically be placed in the new Category 4 and in fact under para 3.11 of the proposed SHLAA undeveloped Green Belt land should be an included category.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
432	We fail to understand why specific land types, Green Belt, has been included within the land availability assessment and therefore question the reasons behind its inclusion	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
434	The Consultation documentation does not identify any “exceptional Circumstances” that could apply to allow development with the land, nor has it identified: Why these areas should be developed? What need is served by developing this land? How it has it identified why that need cannot be better served elsewhere.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
436	The Consultation implies that the Council has the ability to bring forward development in certain circumstances but does not provide reason as to why or how this will be enacted. What information is available to address this point? We believe that the current Moratorium regarding the use of Greenbelt land is still in place. If this has been lifted please provide detail of the consultation and government endorsement. Further the consultation documentation fails to provide information setting out what happens to land once a new categorisation is allocated.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
440	We request that revised consultation documentation and information events are created and that the Wirral Strategic Housing Land Availability Assessment is re-run with Greenbelt land re-categorised and removed.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
463	Very concerned that the basic thrust of this revised methodology is to include Green Belt land in the assessment of deliverability and yet then exclude it as it is contrary to the UDP - This approach would seem to be a huge waste of time for a Council facing massive financial cuts. The Council should be reviewing Green Belt land in terms of their purpose and value. This analysis of their deliverability as if they were urban or Brownfield sites is a completely wrong.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.

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ID	Comment Received	Recommended Response
472	Para 3.77, for a Green Belt site a “willing developer” is completely irrelevant, the value of the Green Belt site is the value it has in protecting the Green Belt.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
473	I am concerned that Green Belt land is now being included in the calculation of the future land supply and while I understand that this would still only be if released for development in an adopted Local Plan, I feel this is setting a very harmful precedent in terms of protecting our vital green spaces. I am also concerned about the protection of any other open spaces within the borough, particularly those of significance for wildlife.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
486, 499, 512	Another option to facilitating development within the Green Belt would be to score sites on their proximity to defined urban settlement boundaries. This option would help facilitate a strategic Green Belt review for potentially releasing land from the Green Belt release.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.
524	There is a need to consider potential for mixed-use development from the outset, to inform suitability scores particularly for larger sites that could be considered as a Sustainable Urban Extensions (SUEs).	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
526	It is considered that a new score of '2' should be applied where the site is located within the Green Belt and would form an extension to the existing defined urban edge of a settlement. Whilst the current scoring is in line with the sentiment of national Green Belt policy, the drop from category 3 to category 0 does not allow for differentiation between sites which are located within isolated positions in the Green Belt or Green Belt sites next to urban areas.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.
485, 498, 511, 532	Support 'theoretical categories' for Green Belt sites but feel that the recognition of Green Belt sites does not go far enough. We particularly focus on the addition of a category which recognises Green Belt sites located immediately adjacent to the existing urban area. Whilst SUEs may not always be located within the recommended walking distances to existing Centres or public transport facilities, their large size offers the opportunity to provide infrastructure on site.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.

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ID	Comment Received	Recommended Response
544	Supports the intended approach to the assessment of Green Belt sites in the SHLAA as set out at paragraph 4.5. The assessment of such sites should be given full consideration as part of any future Green Belt review to ensure a suite of Local Plan allocations which can be demonstrated as being both acceptable in Green Belt policy terms but are also those sites which are most likely to deliver development.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.
550	Sites in Green Belt should be assessed by environmental specialists including tree preservation officers, bird and animal specialists, climate change impact specialists etc.	A detailed review of the Green Belt will be published in January 2020. Further specialist studies will be necessary to comply with national policy before any final decisions are taken.
553	Whilst we are naturally pleased that the Council now considers that greenfield sites within the Green Belt can be placed within a theoretical category tier – based upon the specific merits of each site, as opposed to being automatically placed within the lowest category tier of the SHLAA – we consider that this measure does not go far enough.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
586	If the Council abided by national guidelines regarding Green Belt land, there should be no theoretical scoring system.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
605	We wish to draw the Council’s attention to the intentions introduced by the government in the Housing White Paper (paragraph 1.39). The White Paper proposes that where land is removed from Green Belt, the impact should be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land. The Council should note that the wider landholding of the Estate offers significant opportunity for such compensatory improvements across the Wirral.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. Any compensatory improvements would need to be considered in the Local Plan and secured as part of a subsequent planning application.

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ID	Comment Received	Recommended Response
606	Our understanding of the approach put forward is that where a Green Belt constraint is removed a site would then fall to be considered as either within the urban area, within a major developed site or within an Infill Village and scored accordingly. Green Belt sites adjacent to an urban area may be assigned a score of '5' and those adjacent to an infill village assigned a score of '4' to reflect their location. If this is the case we support this approach as it would enable a direct comparison between sites on all other suitability criteria. We would welcome clarification as to whether the 'theoretical' scoring will be undertaken in line with our assumptions above.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.
653	The designation of land as Green Belt is of no relevance to its physical suitability for development and it should not be factored into the assessment of development suitability in the same way as other site-specific and environmental designations such as flood risk, heritage or ecological constraints. A Green Belt review – rather than the SHLAA – is the most appropriate process with which to assess the merits of land designated as Green Belt for development.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019. A detailed review of the Green Belt will be published in January 2020.
668	We have a concern about the introduction of the 'theoretical' categories for Green Belt Land and their listing and of the proposed 'Category 4'. It would seem that all 'Undeveloped Green Belt Sites' will have a Suitability Score of 1 and would therefore fall in a Theoretical Category 3.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
673	Object to the different treatment of land in the Green Belt set out in paragraphs 4.3 to 4.5	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019
674	Section 3.20 states that limited infill development will be allowed within the boundaries of "Infill Villages in the Green Belt". Would like to see the word 'limited' quantified.	Paragraph 145 of the National Planning Policy Framework makes provision for limited infilling in villages but 'limited' is not defined and must therefore be assessed on a case by case basis.
679	Table 3.1 should include a score for sites, PDL or GF, which can be developed to meet the needs of the Borough without prejudicing those purposes of the Green Belt other than the need to keep land open.	Paragraph 2.70 of the SHLAA 2019 now refers

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ID	Comment Received	Recommended Response
686	Consider that all sites should be included in main body of SHLAA and that Green Belt sites should not be assessed separately. The Council include other sites which are protected in the development plan therefore Green Belt sites should not be considered differently.	The approach to Green Belt is set out in Table 2.1 and paragraphs 2.69 and 2.70 of the SHLAA 2019

Disagree (Reasons Not Specified)

ID	Comment Received	Recommended Response
192	Disagree with the proposals.	Noted
693	Disagree.	Noted

No Comments

Responses indicating no comment were submitted on behalf of National Grid, by the Canal and Rivers Trust and by the Health and Safety Executive.