

Person ID	ID	Question 2.2 - Do you think there are exceptional local circumstances to deviate from the standard method for calculating local housing need?	Question 2.2a - If you believe there are exceptional local circumstances, please let us know what they are, or you can explain why you don't think there are any exceptional local circumstances.	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1241319	LPIO-10037	no	I believe the need for housing should be based on local expert knowledge on the matter, such as the calculations made by Liverpool and Manchester universities. Wirral Borough Council should be using figures between 2,500 - 5,000						
1246743	LPIO-10052	yes	The UK formally left the EU on 31 January 2020. The NPPF dates February 2019?						
1246760	LPIO-10065	yes	Three studies commissioned by the Council with experts at the Universities of Liverpool and Manchester concluded that the Office of National Statistics (ONS) 2016 projections were both "robust and internationally accepted" and implied between 6,100 and 7,100 new homes would be required on Wirral between 202-2035, and recommended the Council should consider a baseline figure of 430 dwellings per annum on average. I do not accept the Council's arguments for dismissing these reports. The Standard Method does not have to be applied if exceptional local circumstances can be demonstrated. Public submissions and two academic institutions have all come up with estimates around half of that projected by the Standard Method. This surely demonstrates that exceptional circumstances must exist. If not, where is the evidence that it doesn't? Over egging the targets to make up for historic under-delivery is nonsense. Targets have to be realistic otherwise you are simply setting yourselves up for failure yet again. Realistic targets will lead to a realistic plan. There is no evidence that building more homes will bring the price down to combat declining affordability. Indeed, the Manchester study concludes that suppressed demand rather than an increase in ability to buy or occupy housing is more likely and may reduce the housing need to 250 dwellings per annum in 2020 -2035.						
1246792	LPIO-10120	yes	The housing need is much less than the local plan caters for. It is essential that green belt land is protected for all wildlife and agricultural needs and for the well being of wirral residents and visitors from the wider area. there has been a good deal more use being made of wirral's green spaces over recent years with walking maps being more widely available of people appreciating the value of getting outside and exercising - this will be ever more so since the Covid-19 outbreak. Wirral is the lungs of the densely populated north west. Climate change alerts us to the need to retain green land to produce food locally and for the planting of trees. Never before has the need to protect as much land as possible from unnecessary development been greater than now. the council should be prepared to put forward alternative calculations that will better reflect true need. This is a time to be proactive rather than passively accept calculations that do not apply.						
1241065	LPIO-10123	no							
1246772	LPIO-10220	yes	The model needs to take into account the specific geography economy and business and organisational needs of Wirral rather than a national average model						
1246778	LPIO-10344	yes	Peninsular - surrounded by water 3 sides. So limited room for expansion. Areas of outstanding natural beauty, leisure peninsular and no influx of people demanding this level of building. Standard method not effective way for Wirral to determine demand of housing. Residential area with no evidence for high demand for housing.						
1238582	LPIO-10554	yes	Applying the same calculation to say West Kirby and Birkenhead is not justified, so the method needs to recognise the residential/business ratio differences and take into account availability of parking spaces for new residents						
1241401	LPIO-106	yes							
1246808	LPIO-10627		Wirral is an area surrounded on 3 sides by water. we have no ability to grow and as we have no nee for the extra houses due to our death rate and birth rate being so low						
1243890	LPIO-1073	yes	The population of Wirral is fairly static so needs a local approach rather than a 'one size fits all' national approach. A government minister confirmed that Wirral doesn't have to follow the standard method.						
1247062	LPIO-10795		For Wirral a priority should be given to regeneration. In other words a 'brown field first' approach to give priority to regeneration sites over green field sites in other parts of Wirral. Hence the boundary of the Green Belt needs to be kept round the urban area to encourage the building of new homes on brown field sites near those deprived areas that would be expected to be helped by construction and related jobs. Regeneration as the stated approach would be undermined by any unnecessary release of Green Belt land and therefore one of the exceptional local circumstances that requires a careful analysis of methods for calculating future housing needs. It appears that Wirral's actual need is nearer 3,000 rather than the 12,000 figure produced by a standard method.						
1247066	LPIO-10801	yes	It seems that Government has recently reduced the National Housing Target by approx. 33% so I would think Wirral Council should do the same, which would mean max 8,000 new homes needed.						
1237930	LPIO-10837	yes	There are exceptional circumstances because there is absolutely no evidence to suggest Wirral needs anywhere near 12000 homes. The Council have already made it clear there is very low growth on Wirral, infact between 1997 and 2017 population growth was just 100.						
1247077	LPIO-10853	yes	There are exceptional circumstances because there is absolutely no evidence to suggest Wirral needs anywhere near 12000 homes. The Council have already made it clear there is very low growth on Wirral, in fact between 1997 and 2017 population growth was just 100.						
1247079	LPIO-10870	yes	Between 1997 and 2017 population growth was just 100. There is very low growth on the Wirral.						
1247087	LPIO-10886	yes	Firstly, in recent history, Wirral has shown negligible growth. With the move away from local manufacturing (Cadbury, Champion, and soon Vauxhall), there will be few local jobs available, thus reducing the demand. Secondly, we are a peninsula - we cannot expand housing capacity significantly without adversely impacting the environment.						

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1247098	LPIO-10916	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247103	LPIO-10934		I think there are exceptional local circumstances for deviations, because there is no evidence to suggest the Wirral needs 12,000 new homes. Wirral council have already stated that there is very low growth on Wirral for either economic or population growth. In the last 20 years pop growth was just 100.						
1247120	LPIO-10952	yes	Yes, when local growth clearly indicates a much lower rate of growth (as has been consistent for some years)						
1247128	LPIO-11020		The calculations are not relevant to the Wirral. Due to the Wirral being split into two clear groups. Fortunate and less fortunate! The West side of the Wirral, has a much older population nearing retirement or retired. There is less future employment in the Wirral area, due to the decline in local businesses and the geographical restrictions of the Wirral. Resulting in working families moving away in search of employment and housing. The industrial Birkenhead docklands zone has seen decline over a number of decades and virtually collapsed. This can be seen with land and commercial property values, when compared to the rest of the United Kingdom. With no strategy to build it back up again which in turn would create employment. Other councils have reported building houses does not make jobs for the local people. Working families leaving the Wirral to find employment and housing. Collapse of Birkenhead industrial area. Market failure land and property values in Birkenhead area. No strategy to rejuvenate commercial areas in Birkenhead. Decades of decline in Birkenhead region. If there are low employment opportunities, there is no reason for the high housing calculations across the Wirral. Whatever the housing strategy is, there needs to be an employment strategy to run alongside.						
1247129	LPIO-11036		The population of the Wirral has shown very little growth and still sits 30K below its peak in the 1960's, population growth has been over estimated and with a largely older population a generational shift is due to adjust this figure naturally. The government themselves reduced their figures in the latest Queens speech, with large semi-rural areas and deprived urban areas in greater need of regeneration, there is very little to justify 12,000 people coming to the Wirral as it simply doesn't have this growth from within or externally. Plus, how any of this can hold any relevance post corona virus makes these pretty exceptional times to be considering this.						
1247132	LPIO-11069		Wirral is a peninsular already groaning under the weight of insufficient infrastructure, Hospitals closed, Fire Stations closed, Colleges closed. People are born here and stay here - so no in and out of population figures. I do not agree with the Councils Calculations.						
1247133	LPIO-11084		Yes, between 1997 and 2017 population growth was just 100. There is very low growth on the Wirral.						
1247135	LPIO-11098		Population growth on the Wirral does not justify using the 'Standard Method'.						
1245190	LPIO-11119		Yes, as detailed above. Independent surveys of future housing needs and the Council's own Compendium of Statistics 2019 clearly indicate significantly fewer homes will be required over the Plan period.						
1247144	LPIO-11133		Studies commissioned by WBC carried out by Liverpool & Manchester universities, show that there is no need for 12,000 houses & building change emergency it announced in July 2019. In the recent Queen's speech th Government Housing Target was out by a third.						
1247146	LPIO-11150		There are exceptional local circumstances because there is absolutely no evidence that Wirral need anywhere near 12,000 homes. Studies commissioned by WBC from Universities of Liverpool & Manchester point to significantly lower figures. Compelling evidence from consultants, universities, WGSA experts is in the possession of the council, showing that the figure of 12,000 is over inflated. The minister for Housing stated (in letter Jan 19) that the standard method 'does not produce a target' it is a starting point!						
1247154	LPIO-11186	yes	Yes, there is no evidence to suggest the level of growth is anything like that suggested.						
1241412	LPIO-113	no							
1247250	LPIO-11394		I am aware that information has been provided to the Council by the Wirral Green Space Alliance that indicates the need is significantly lower than the Local Housing Need calculation. If this is indeed the case, then the Council should conclude that exceptional circumstances justify an alternative approach. I urge the Council to seriously consider this information and review its proposals as appropriate.						

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1247015	LPIO-11419	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247290	LPIO-11474		The Wirral population has not grown over the last 25 years and shows no sign of growing in the near future. Your hoped-for jobs creation of between 6,600 and 11,500 is pie in the sky. If the Brexit negotiations with the EU fail, we would see jobs disappear and even if they succeed, the economy will grow at a much slower rate. EU funding has dried up, as has the Chinese. The population isn't increasing, it is simply growing older. In 1996, 66% of the population was under 50, now it is just 58% with 21% of us over 65. Wirral Borough Council has a legal and a moral duty to look after the best interests of the residents of the borough both present and future. By blindly sticking to this unrealistic figure of 12,000 the council is failing it this duty. You need to reassess as a matter of urgency. Studies carried out by reputable bodies such as the Universities of Liverpool and Manchester and the Wirral Green Space Alliance have shown the figure to be wildly excessive. The Government recently downgraded its national housing target by 33% yet WBC is ignoring this significant reduction and is still using 2014 figures - 6 years out of date. The Council's figures include bringing empty properties back into use and suggest a figure of between 1,125 and 1,425 over the period of the plan (75-95p.a.) In the 8 years from 2011-2019, 1,580 properties were brought back into use (197p.a.). Over a 15 year period this would work out at 2,960 and with a little effort on the part of the Council could be even higher as there are more than this figure currently empty. The difference between 2,960 and 1,125 is 1,835, not far short of the total number of houses you propose to build on SP062 in Option 2b. Once again, your figures are flawed. Why are you using unrealistic figures? It is only because you are sticking to this inflated figure that you even need to consider building on greenbelt.						
1247196	LPIO-11551	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247031	LPIO-1168	yes	Wirral is a peninsular, surrounded on three sides by water. WBC have commissioned and paid for 3 reports from Liverpool and Manchester Universities. They have chosen to ignore these reports which show much lower housing need figures. They have also chosen to ignore reports from local experts which also come to the conclusion that the housing numbers should be much lower than the 803 per year resulting from the standard method calculation. The Wirral Compendium of Statistics (also compiled by WBC) also shows that this housing number is not required. In fact, table 1H in this report shows that the population of the Wirral has only increased by 100 in the last 21 years, so how can it imagine that we will need dwellings for just under 29,000 people over the next 15 years (based on the average household of 2.4 fullfact.org and statista.com) The councillor in charge of the Local Plan herself has said in a meeting I attended, that she and the council officers believed that the 12,045 figure was too high.						
1244681	LPIO-1202	yes	Local demographic trends are much lower than assumptions made when the 12 000 figure was arrived at. See the 2019 Wirral Compendium of Statistics.						
1244629	LPIO-1230	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247214	LPIO-12376	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247492	LPIO-12472	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1243254	LPIO-12636 1 of 2		Included here is a (tiny) section of the Responses produced by a local resident and expert: I ask the Council what 'very special circumstances' outweigh the harm described above? If the answer is: necessity forced on the Council, my enclosed submission challenges that claim (3). The Council has repeatedly argued in the media during 2018/19 that they 'have no choice' but to build on Green Belt sites due to 'government imposed' housing targets and a shortfall of brownfield sites for development. In fact the Council has considerable room for manoeuvre if we consider the statement of Sajid Javid, on behalf of the MHCLG, to Parliament on 14.09.17: We're not dictating targets from on high ...these 3 steps [in the Standard Method] will provide a 'starting point', [for] an honest appraisal of how many homes an area needs. But it should not be mistaken for a hard and fast target...How to meet demand ...where to develop, where NOT to develop...and so on, remains a decision for local authorities and local communities. More recently other ministers have repeated this policy statement. Recent ONS technical reviews have confirmed the position on the use of ONS SNPPs [as follows]: Projections are not forecasts and, because of the inherent uncertainty of demographic behaviour, any set of projections will inevitably differ from actual future outcomes to a greater or lesser extent. As such, the sub-national population projections should be used as a 'starting point' and supplemented with local information for planning purposes [from] 'SNPPs Quality & Methodology Information'; 'Accuracy & Reliability' section ONS technical report, 09.04.19 Eminent sources [Universities of Manchester and Liverpool, and WCGSA experts,] have each independently provided the Council with compelling evidence that its 12,000 Housing Requirement figure is inflated by a factor of 2 to 4 times.						
1243254	LPIO-12636 2 of 2		The Council must, therefore, act more rationally and boldly, using lower figures which Cabinet Members and Senior Officers have accepted are more applicable and, if adopted, would not delay the Local Plan. Not challenging the figures for actual need, especially in the light of the recent Queen's Speech which reduces the National Homes Target by 33%, gives landowners and developers an 'open goal' to argue for green belt development, emphasising the problems related to delivering so much, so quickly using the more difficult brownfield sites with unsecured funding. The solution and 'Preferred Option' should be to work with the support of so many community groups and individuals, and to put forward more realistic targets and proposals (backed by real local, historic, current and future trend official data) and get on with securing available Government and Private Sector funding. After admission that, until last May's local elections, there was indeed an undisclosed, even refuted, policy of house-building in green belt in order to "kick start the local economy" and increase Council Tax receipts, the high figures and dire conclusions of Local Plan reports leave one wondering. Please take the opportunities on offer to produce a Local Plan based on much more realistic (lower) figures, ones suited to Wirral's needs and more likely to attract support and thereby succeed, which is what we all seek.						
1240843	LPIO-12641	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247578	LPIO-12839	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1243700	LPIO-1284	yes	The Wirral is a unique peninsula with no other comparable site in the UK. WBC has not stated which circumstances it has considered and ruled out as not exceptional. ONS figures do not confirm a forecasted population growth to warrant the building of 12000 net new dwellings. There are no evidentiary signs of ant transformation of Wirral's economic expansion. the economy is actually declining. The Green Belt is the success story of Wirral. It has great significance for carbon capture, the biodiversity and heritage assets of the borough. has flood prevention capacity, has an agriculture value and a positive effect on air quality. The issues and options restricts its view to planning matters and has not considered its wider aspects. There are NO weakly performing parcels when the wider aspects are taken account of. The Boroughs of Wirral and Cheshire West should be viewed as one planning area (a peninsula), what happens in one borough affects the other. A joint plan is the best option.						
1247510	LPIO-12962	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246335	LPIO-13085	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246578	LPIO-13326	yes	There is no evidence of significant economic or population growth on the Wirral						
1246853	LPIO-13354	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1244819	LPIO-1337	yes	Few jobs/industries are actually growing on Wirral to support such a large housing increase. Many people commute to Liverpool, Manchester or Chester to work, as these are the main employment areas. Increased new housing should be concentrated close to the potential job sites to minimise environmental impact. The development plan should be based on a sound assessment of economic growth on the Wirral, and one that is realistic						

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1246852	LPIO-13476	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1238043	LPIO-1349	yes	See question 2.1. The trend within the population figures is for an ageing population. This must impact on the need for new builds. A large proportion of Wirral residents travel outside the Wirral for work. If as is hoped new employment opportunities are created, this will not translate fully into a need for new houses as a proportion of existing residents may take these jobs especially if they are of high quality. Commuting is becoming more expensive and more environmentally unacceptable.						
1247746	LPIO-13631	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1238192	LPIO-13826	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247012	LPIO-13880	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247014	LPIO-13934	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict "brownfield first" approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1242183	LPIO-13948	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247218	LPIO-14044	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247219	LPIO-14149	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247220	LPIO-14247	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247222	LPIO-14378	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1244898	LPIO-1439	yes	1. The huge difference between the 12,000 formula figure and Wirral's actual Need, which is nearer 3,000, is an exceptional circumstance in itself, sufficient enough to trigger the challenge and to base the Local Plan on a lower figure. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts who are members of the Group of 20+ Wirral community, environmental and other societies; also by others. 2. Wirral's population has basically flat-lined for years and growth in population or the local economy does NOT support a higher figure. There is a NIL chance of 12,000 being correct nor is Wirral about to be invaded by 20 to 30 thousand people. It is nonsense to suggest this and our Council knows it. Does it still want green belt development for the money? 3. Wirral's Green Belt was tightly drawn around existing areas of housing specifically to address the main demand and need which was Regeneration ... Insufficient space so please see the attached File: LP Consultation Feb2020	https://wirral-consultobjective.co.uk/file/5677285					
1247226	LPIO-14466	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247245	LPIO-14556	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1247829	LPIO-14599		I disagree, 800 new houses to be built p.a. is too high, not achieved in recent past, unlikely occurrence of a great influx of people or of sufficient local young people needing houses. Also Wirral is a peninsula, trying to attract more tourism with its green areas (Green Belt and Urban Green Spaces) and its sea shores, has not got the necessary suitable non-urban space available for such a high number of additional dwellings. The green areas, particularly the Green Belt and its wildlife, would suffer not just where disappearing under the new houses and gardens but also through additional use of the Greenfield land through leisure pursuits. Protection of habitats, animal and plant species and maintenance of high biodiversity would be (further) compromised.						
1239377	LPIO-1460	yes	There is no reasonable evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear there is very low growth on Wirral regarding its economy and population. For example, between 1997 and 2017, population growth was just 100!						
1246827	LPIO-14684	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247016	LPIO-14870	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247018	LPIO-14940	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247246	LPIO-15305	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247248	LPIO-15400	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247251	LPIO-15522	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1242519	LPIO-1554	yes	Wirral is a peninsular with limited access into or out of the borough it does not require this amount of development.						
1247252	LPIO-15614	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247274	LPIO-15702	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1238835	LPIO-1575	yes	There are exceptional circumstances to deviate from the UK Government's standard method proposed by Wirral Borough Council (WBC), owing to the fact that the Council's own Intelligence service (Compendium of Statistics for 2019) makes the case quite clearly that there is absolutely no evidence to suggest that Wirral needs anywhere near the 12,000 units suggested. Already, WBC have made it categorically clear that there is little or no growth on the Wirral in both population and economic terms. The WBC's own Intelligence Service Compendium show that during the period 2004 to 2017, we have a falling birth rate but a stable population showing marked decrease in the economically productive segment ie those in age ranges 16 -50. To compound this data, I understand that two independent University reports, funded by WBC both concluded that housing units required during the period 2020-2035 were less than half of the 12000 units proposed.						
1247275	LPIO-15808	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1237922	LPIO-1582	yes	Evidence from experts has been presented to the Council. This shows the real need which is much lower						
1247935	LPIO-15869	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth.						
1244969	LPIO-1589	yes	Calculations by other professional bodies, identified previously, have resulted in significantly different to WBC. If they have identified specific exceptional circumstances which apply then it is the duty of WBC to explore this and liaise with said bodies to identify the real housing need number						
1247936	LPIO-15960	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247287	LPIO-16180	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247344	LPIO-16267	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247349	LPIO-16355	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247353	LPIO-16442	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247354	LPIO-16531	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247434	LPIO-16627	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1247436	LPIO-16737	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247437	LPIO-16833	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247439	LPIO-16834	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1238156	LPIO-17	yes	As I have answered to Question 2.1, I am concerned that the approach is too generic, and perhaps places too great an emphasis on Wirral as part of the Liverpool City Region, and not enough on our independence? My experience working in the North End (and previously in Tranmere and Rock Ferry) is that people in urban "inner-city" areas such as these consider Liverpool to be "another place" they wouldn't consider within commuting distance for employment.* *Except when it comes to football.						
1247441	LPIO-17042	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247960	LPIO-17163	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247962	LPIO-17250	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247966	LPIO-17355	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247971	LPIO-17457	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1241726	LPIO-17550	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245062	LPIO-1764	yes	I am an immigrant to the Wirral. Having known the Wirral for only 10 years now, I feel the Wirral community is a unique homogenous one. A geographical background placed between one small country and a small vibrant city prised since viking times. Perhaps what makes this small spit of land, this peninsula is the restrained building history. Creating the proposed numbers in this area, of this size will open the floodgates for more vast build plans. In 20 years the peninsula could become just another urban sprawl. Rather than the vibrant urban and semi rural place we all know and enjoy today.						
1247979	LPIO-17648	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1247980	LPIO-17649	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1242541	LPIO-1765	yes	Exceptional local circumstances are population historic and predicted trends for the Wirral which are lower than those used in the local plan for housing projections.						

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1245069	LPIO-1775	yes	Wirral is a very unique peninsular and consequently attracts people a) to live here and b) to visit as tourists. In addition Wirral's population has remained unchanged over the years with the figure in 2017 the same as that in 1996, therefore the demand for dwellings is non-existent. Geographically the area is relatively small and further expansion will have a significantly detrimental effect on the overall environment. Any such change will deter people from living in Wirral and lead to a reduction in the wealth attracted to the area, with knock-on effects to the local economy.						
1245502	LPIO-17842	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245060	LPIO-1785	yes	I do not agree with the Council's calculations using the standard method set out in national guidance because I see no evidence within the options and issues document to support the amount of growth that the Council are projecting. Indeed, in their own Compendium of Statistics 2019 it clearly states that there should be 327 homes per year, not 803. This is also confirmed by the Government's Queen's speech where National Housing Figures have been dropped from 300,000 per year to 200,000 per year. I believe the Council should recalculate their figures based on local projections and government national housing targets.						
1247541	LPIO-17944	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1241669	LPIO-180	no							
1247539	LPIO-18046	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1237857	LPIO-18116	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100. WBC commissioned reports on Wirral housing need from Liverpool & Manchester Universities but dismissed them despite their eminence. These reports showed a fraction of the 12,000 figure.						
1247996	LPIO-18203	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245070	LPIO-1834	yes	In order to justify building 800 additional homes each year for 15 years there would need to be a very significant increase in job opportunities on the Wirral, bearing in mind that there is already a shortage of employment opportunities in the area.						
1247021	LPIO-18421	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive Standard Method.						

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1247022	LPIO-18475	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247023	LPIO-18530	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247024	LPIO-18585	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247025	LPIO-18689	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247038	LPIO-18691	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247039	LPIO-18807	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247040	LPIO-18808	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247041	LPIO-18875	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247042	LPIO-18943	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247060	LPIO-19050	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247061	LPIO-19051	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247063	LPIO-19116	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247064	LPIO-19170	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247068	LPIO-19224	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247071	LPIO-19281	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247072	LPIO-19339	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247078	LPIO-19394	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1237833	LPIO-19502 1 of 2		Planning Practice Guidance (PPG) sets out circumstances where it might be appropriate to consider whether the actual housing need figure than the standard method indicates. These include, but are not limited to: • Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (eg Housing Deals); • Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; • An authority agreeing to take on unmet need from neighbouring authorities; or • Where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method. The Council will need to consider if any of these circumstances apply in their area. It is noted that the Strategic Housing Market Assessment (SHMA) Final Draft Report (Jan 2020) suggests that due to evidence in relation to past delivery that the local housing need identified by the standard method is an ambitious target and further uplifts are not recommended. The HBF consider that the Issues and Options Report and the evidence that underpins it, has not had sufficient regard to the issues that could justify a higher figure than that currently proposed. The HBF consider that the Council will need to take into account the aspirations of the 'Northern Powerhouse' agenda, the Liverpool City Region (LCR) Combined Authority Devolution Deal, the LCR Local Enterprise Partnership's Strategic Economic Plan and the Wirral Growth Plan amongst others. The NPPF is clear that planning policies should 'seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment', there is a clear risk that if sufficient housing is not provided these growth strategies will not be delivered, that jobs growth will not be met or that unsustainable commuting patterns will be created. The HBF consider that the Council will also need to give consideration to Strategic Infrastructure Improvements in the Borough. Including, on a regional scale the Transport for the North (TfN) Strategic Transport Plan, which sets a commitment to Northern Powerhouse Rail (NPR) connecting the Liverpool City Region to HS2.						

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1237833	LPIO-19502 2 of 2		And on a more local level the Strategic Regeneration Framework, which sets a number of key infrastructure improvements for the A41 a key strategic route supporting growth and opportunities within Wirral. Furthermore, new replacement Merseyrail Trains will begin to be introduced on the Merseyrail network this year. This will increase capacity on the network, with trains also expected to run on an extended network beyond the current Merseyrail boundaries. The HBF also consider that the Council should give further consideration to the affordable housing need. PPG (ID: 2a-024) states that 'the total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes'. Given that the Draft SHMA (2019) identifies a net annual imbalance of 705 affordable dwellings across the Borough, it would seem appropriate to consider an increase in the housing requirement above that set out in the LHN. The HBF does not consider that the lower levels of housing delivery over the recent past should be utilised to evidence the currently proposed housing requirement, it is likely that the lower levels of delivery have more to do with the failure to maintain an up to date Local Plan, rather than the level of household demand and aspiration. The HBF consider that there are local circumstances as set out above which mean that the Council should increase the housing need figure and the housing requirement above the LHN calculated purely on the standard method.						
1247080	LPIO-19507	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247081	LPIO-19508	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1239386	LPIO-19579		Economic prospects are an important factor in deciding on future housing need. Brexit and the ongoing Covid-19 pandemic are likely to severely impact on the economic prospects of Wirral especially as global capitalism has not yet recovered from the 2008 financial crash. Bearing this in mind it is reasonable to expect a dramatic downturn in the economy. The economy impacts local housing need in several ways. This is because people move into an area when more jobs are available, and people will tend to have bigger families when they can afford them. Wirral has had no population growth for 30-40 years and this must be recognized as a good thing. One can only imagine what a Wirral with a significantly larger population would look like with more houses, more roads, more cars and less green space and importantly less farmland to grow our food. The impact on air quality and health would be significant.						
1248131	LPIO-19608		I object for the following reasons: 1. There is no evidence to support the need for 12,000 2. The councils own Consultants have produced figures which are significantly lower than 12000 3. Studies from the Universities of Liverpool and Manchester estimate a significantly lower number of new homes are required						

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1247082	LPIO-19662	yes	Exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247083	LPIO-19716	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247084	LPIO-19780	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247085	LPIO-19836	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247088	LPIO-19901	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247089	LPIO-19962	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247090	LPIO-20017	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1245083	LPIO-2004	yes	No evidence to suggest Wirral needs 12,000 homes. Between 1997and 2017 population growth was only 100						
1247091	LPIO-20072	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247092	LPIO-20131	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247093	LPIO-20195	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247094	LPIO-20250	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247095	LPIO-20305	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1245086	LPIO-2033	yes	Prof Simpson of Manchester University in a document entitled "An objective assessment of the latest ONS Household Projections for Wirral Metropolitan Borough" published in December 2018 that "The latest ONS projections, 2016-based, indicate a projected growth in the need for housing during 2020-2035 of 430 dwellings per annum in Wirral. This is fewer by some 200 per annum than the previous two projections based on data to 2012 and to 2014" Even the 2014 figures did not predict a need for 800 new homes a year in the Wirral & the data from 2016 indicates an even lower number. Local needs should dictate the number of new houses built and not national trends, which incidentally show that the population growth is slowing down (annual population growth rate published in 2018 was only 0.6%, slower than any year since 2004). Wirral does not need 12000 new homes.	https://wirral-consult-objective.co.uk/file/5675144					

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1247096	LPIO-20361	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1237870	LPIO-2040	yes	YES - there are exceptional circumstances. Wirral DOES NOT need anything like 12,000 new homes. The Council has already stated that there is very little population growth in Wirral. A population growth of 100 in the 20 years between 1997 and 2017 certainly does not warrant the building of 12,000 houses.						
1247099	LPIO-20417	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1245100	LPIO-2047	yes	Local demographic trends as in Wirral's Compendium of Statistics 2019 which indicates that fewer homes per annum are required. 327/annum rather than 803/annum.						
1247101	LPIO-20471	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247108	LPIO-20487	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247102	LPIO-20488	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1245105	LPIO-2067	yes	As set out in your consultation document (para 1.5) 'Wirral is at a crossroads'. Good quality well planned urban regeneration would provide huge long-term benefits. Using greenfield sites in order to meet targets that are not tailored to the local areas needs could have a devastating impact on these positive plans for regeneration, as well as on the environment and quality of living on the Wirral. I believe Wirral has 'exceptional circumstances' in regard to the need to: - provide urban regeneration; - protect greenfield; and - allow housing development in line with more accurate projections of housing needs. In addition, the long term absence of an agreed local plan means that the Wirral needs a more tailored and specific target.						
1247106	LPIO-20675	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247105	LPIO-20676	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247109	LPIO-20741	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247110	LPIO-20837	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247111	LPIO-20838	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1248141	LPIO-20870		Furthermore WBC has not yet identified sufficient 'Brownfield' sites to avoid Green Belt Release. These are areas which could be regenerated in the north and east of the Peninsula to produce well-serviced 'green' communities with affordable housing. We need to preserve the existing Green Belt for secure food production, tree planting, cleaner air, health and welfare, wildlife habitats, enhancing heritage assets, enjoyment of fabulous views and walks and the leisure and tourist economy. Underpinning all of this is the essential role open 'green' spaces contribute to everyone's mental wellbeing.						
1238036	LPIO-2094	no							
1247112	LPIO-20961	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247113	LPIO-21015	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247115	LPIO-21071	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247116	LPIO-21125	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1246851	LPIO-21137	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246918	LPIO-21224	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246924	LPIO-21225	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246928	LPIO-21226	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245112	LPIO-2124	no							
1246920	LPIO-21487	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246926	LPIO-21488	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1247117	LPIO-21747	yes	<p>Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.</p>						
1247118	LPIO-21748	yes	<p>Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.</p>						
1247145	LPIO-21855	yes	<p>Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.</p>						

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1247147	LPIO-21856	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247148	LPIO-21964	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247150	LPIO-21965	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1244329	LPIO-22039	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247119	LPIO-22136	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1246678	LPIO-22137	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1243721	LPIO-2224	yes	Regeneration and development on brownfield sites should have priority. The existing green belt needs protecting - there is ample opportunity based on brownfield, old industrial land for new housing which will also be a positive improvement to areas of deprivation. Wirral is not surrounded by other land, we must work within our watery boundaries to keep a variety of land uses. Diverse opinions re the number of new households required, and we support the Council's efforts to get this re-examined and calculated.						

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1247151	LPIO-22244	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247152	LPIO-22245	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247153	LPIO-22258	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247155	LPIO-22359	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247156	LPIO-22472	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247158	LPIO-22473	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247159	LPIO-22503	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247160	LPIO-22504	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247161	LPIO-22717	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247164	LPIO-22718	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247167	LPIO-22846	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247168	LPIO-22847	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247169	LPIO-22874	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247170	LPIO-22875	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1248318	LPIO-23025		Development of greenfield sites I am alarmed by the statement that Greenfield sites will be defaulted to if brownfield targets cannot be met. As any planner, developer knows this simply allows the developers at any point to say that they cannot meet the brownfield targets. Simply defaulting to Greenfield sites for ease and maximum profit. Fundamentally if up to date ONS figures were used there would be no need to identify greenfield sites to be removed from Wirral Greenbelt . The Strategy and statement is not satisfactory and must be changed to ensure that development of any greenfield site cannot occur without having completely exhausted all brownfield sites. The default caveat must be robust and publicly measurable before a site can be developed and must be open prior and during to public scrutiny and subject additional consultation. Otherwise The Local Plan will be developer led and will result in all green field sites being immediately developed.						
1245146	LPIO-2307	yes	Significant urban regeneration of deprived areas is required as a priority in Wirral. Release of green belt would be contrary to assisting in urban regeneration. New housing and infrastructure in brownfield sites will assist in improving deprived areas and the local environment by bringing new life to neglected parts of Wirral. Wirral's population is not increasing and so future housing needs are not correctly computed. 12,000 target figure is significantly excessive according to other experts.						

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1247173	LPIO-23111	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247174	LPIO-23112	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247175	LPIO-23228	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247176	LPIO-23229	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1245145	LPIO-2323		The calculation of housing need can only realistically be based upon a. past experience of population trends , and b. future projection of proven need Given that the past experience suggests that there has been no population growth in this century, and that there are no identifiable factors which suggest that that factor will change, this is a clearly identified exceptional local circumstance which it is mandatory to consider Not the least of the factors which suggests that there will be no population growth is that employment opportunities within Wirral and its surrounding areas have been steadily diminishing since about 1980 Furthermore , one of the results of the loss of industrial activity has been that a considerable amount of brownfield land has been freed which will in large measure be suitable for any satisfaction of future need, and the only sensible use of resources is to use such brownfield sites in preference to any encroachment upon green belt						
1247177	LPIO-23385	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1247178	LPIO-23386	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict 'brownfield first' approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						

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1247179	LPIO-23387	yes	Yes, there are exceptional circumstances 1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral (compare to national averages). This requires a strict "brownfield first" approach to give regeneration sites priority over the green field sites located in less deprived areas of the Wirral. Therefore, the Green Belt boundary needs to be kept tightly drawn around the urban area in order to force new development for housing and employment onto brownfield sites close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Releasing Green Belt land unnecessarily would result in the imperative of regeneration being undermined. These are exceptional circumstances which require a more tailored analysis, when considering future housing requirements, than an increasingly insensitive national standard method. 2. There is a huge difference between the 12,000-formula figure and Wirral's actual need, which is nearer 3,000. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. 3. Wirral's population has basically flat-lined for years and even declined in population compared with historic figures and this does NOT support the 12,000 figure. 4. We understand from Wirral Green Spaces Alliance (WGSA) discussions with the Council that Cabinet Members and Officers do not believe in the 12,000-figure – as per WGSA notes of meetings and letters to the Government. 5. The Council's stated approach recognises the urban deprivation and poverty prevailing in parts of Wirral and the need for housing and employment on brownfield site close to areas of deprivation where new housing and jobs will help to solve the problems of deprivation. Use of exaggerated housing need forecasts would result in Unnecessary release of Green Belt land that would undermine this approach. These circumstances warrant an alternative more tailored approach to calculating housing need than the insensitive the Standard Method.						
1248376	LPIO-23564		Climate change, Brexit and now the Coronavirus are all "Exceptional Circumstances" for Wirral to reduce the target. Now, more than ever, we need Green Fields to mitigate against climate change, produce food and for people's health and well being. The Barnston Road site will mean a significant increase of cars in the area, increasing traffic and pollution.						
1248383	LPIO-23578		The massive increase in housing and population proposed must surely run counter to the Council's own "Climate Change Emergency" and will certainly not lead to a reduction in CO2 nor an improvement in air quality in the borough.						
1248383	LPIO-23579		The township of Birkenhead was not created on the off chance of major industries being established in the Victorian era. It was created to provide housing for the many workers required as the new industries expanded rapidly. Most of these industrial jobs have now disappeared.						
1248383	LPIO-23580		The Council refuses to accept its historical rate of empty home conversions of 250 per annum. A figure of only 90 is used, undermining their own argument of regenerating the deprived areas. There are some 4,000 to 6,000 empty homes in the Borough.						
1248426	LPIO-23696		I understand that WBC is charged with delivering 12,000 new homes over a 15 year period – a figure which has 'been established through (your) evidence base' (1.14); however, the most recent information regarding population growth indicates that the population on Wirral is either static or falling (see University of Liverpool Centre for Sustainable and Resilient Cities paper from 5th December 2018 in which it states that the figures used by WBC do not represent the most robust approach to assessing demographic change). Even using data produced by the ONS, the population of Wirral is expected at the most to rise by a mere 1.3% by 2026 with the most significant increase being in the post-65 age group. If the proposed 12,000 homes are to accommodate about 35,000 people, this represents a population increase of about 10%. Obviously, the impact of such a rise is enormous but also highly unlikely.						
1244826	LPIO-2371	yes	Absolutely - Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council has already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100. The Wirral population is aging and declining therefore current housing stock will become available on the secondhand market as the residents will have deceased or moved on to live nursing homes or with family members.						
1248463	LPIO-23741		It is our view that exceptional circumstances may exist to depart from the Local Housing Need figure, derived from the standard method. We are aware that information has been provided to the Council that indicates the need is significantly lower than the Local Housing Need calculation. We urge the Council to seriously consider this information and review its proposals as appropriate.	https://wirral-consultobjective.co.uk/file/5657858					
1248438	LPIO-23753		It is unclear what, if any, further adjustment has been made to the housing requirement to factor in future economic growth in the Borough. It is imperative that the emerging Local Plan delivers sufficient new housing to support the economic growth of the Borough. Whilst the SHMA 2020 does not consider that an uplift to the housing requirement should be advanced having regard to past delivery levels, it should be noted that delivery levels in were significantly impacted by the Council's Interim Housing Policy (2005-2012), the economic recession of 2008, the lack of available land on which to deliver owing to the tight Green Belt constraints across the Borough and the continued absence of an up-to-date Local Plan, which means that there remains a significant unmet demand for market and affordable housing in the Borough. Net housing completions during the UDP period 1986 to 2001 demonstrate that housing delivery is capable of being much higher than the net average of 544 dwellings per year over the last five years, and there is developer appetite to build new homes in the Borough. The Council should have regard to these mitigating factors and historic delivery rates to ensure that the final housing requirement set out in the emerging Local Plan is capable of meeting the economic needs and growth potential of the Borough over the next 15 years.	https://wirral-consultobjective.co.uk/file/5684850	https://wirral-consultobjective.co.uk/file/5657890				

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1248091	LPIO-23805		Special Circumstances for the Borough 3. The population is aging and declining, as shown over the last 30? years. Over the next twenty years (say) the only reality will be their houses becoming available on the second-hand market as the residents will have "passed on" in one way or another. The decline in occupants per household may be seen as a "need" for housing in some parts of the country. For the Wirral it merely reflects the demographics with residents leaving households... in a box. 4. This supposed "need" for some 12,000 new homes is contrary to the Council's OWN Compendium of Statistics that clearly states a figure nearer a third of 12,000+. The Council's 12,000+ housing "need" is based on optimism that borders on "creativity with the truth". It would imply a growth of population of some 20,00 to 30,000 people. Where are the high value jobs for such numbers, enabling them to buy or even rent these new houses? With the ageing population literally "dying off" is there any need for new housing? The latest ONS and Government figures show a much reduced "need". The "need" for such housing numbers seems to be based on the Council's budget forecast "need" for new income from Council Tax in the coming years. This is therefore a deeply flawed business case, not a Local Plan. Without new jobs the costs associated with the "new residents" in social care, health needs and new infrastructure would outstrip any increased income from extra Council Tax. (Assuming any houses are actually built and the taxes are actually paid (on time)). The township of Birkenhead was not created on the off-chance of major industries being established in the Victorian era. It was created to provide housing for the many workers required as the new industries expanded rapidly. Most of these industrial jobs have now disappeared.						
1248445	LPIO-23818		The plan's Green Belt proposals should be replaced by the exceptional case that Wirral, as a peninsula, with its limitations of communications, of population growth and its major areas of brownfield potential is an exceptional case for relief from the standard methodology of household projections. The figures used and assumptions made for housing needs across Wirral are flawed. Wirral's population is stagnant. Using a number of sources, including the Council's own figures, the most credible analysis is that the Wirral population grew from 314,700 in 2001 to 321,238 in 2018, a growth of 6,538 (or 2% over this whole period) which is annually approx 380 people per year. There is little employment in Wirral, other than the service industries. People work in Liverpool, Manchester and Chester. Young people leave the Wirral to seek work.	https://wirral-consult.objective.co.uk/file/5659115	https://wirral-consult.objective.co.uk/file/5659116				
1242185	LPIO-23874 1 of 2	yes	Yes. The standard method results in a figure that is between three and four times higher than the average past trend. The scale of difference between the 12,000 formula figure and Wirral's actual need, which is nearer 3,000, is an exceptional circumstance in itself, sufficient to trigger a challenge and to base the Local Plan on a lower figure. The 3,400 figure comes from the Council's own statistics and other official public records, is validated by independent experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts. The background papers to the Queen's Speech refer to 33% lower national level annual requirements. The Council could articulate on this and seek a lower figure. Wirral's population has been static for a number of years. Demographic data does not support a higher growth figure. The 12,000 requirement is unachievable and unrealistic. We understand the Council's own members and officers do not believe in this high requirement. Wirral is a peninsular with a long coastline stretching around three of its sides with associated environmental designations, some of international importance, relating to protected species, particularly migratory birds. Much of the area is designated Green Belt, land serving important Green Belt purposes that would be harmed if allowed for development. The Green Belt of Wirral was purposefully drawn tightly to respond to threats posed to the countryside from unrestricted growth and the need to revitalise previously built areas. Regeneration has been a long standing ambition of the Council, and other tiers of Government.	https://wirral-consult.objective.co.uk/file/5659121	https://wirral-consult.objective.co.uk/file/5684263	https://wirral-consult.objective.co.uk/file/5657006			
1242185	LPIO-23874 2 of 2	yes	The Merseyside County Council policy, agreed by all constituent Local Authorities, was to use Green Belt designation, now reinforced by National Planning Policy Framework, Paragraph 134 purpose e), to steer investment to areas in need of regeneration. We believe this ambition is unchanged. The brownfield first focus of the NPPF, emerging Liverpool City Region Spatial Development Strategy and the Local Plan remains clearly stated. The Council has repeatedly made declarations and passed motions to protect Green Belt land, not release of farmland for development and increase tree planting. Wirral has heritage assets, which have the potential to support a vibrant visitor economy. We want the heritage assets to be thoroughly assessed and in planning for future land use, best protected. Heritage assets are located within the parts of Green Belt, which is proposed for release. The Council has statutory obligations to protect the area's heritage assets commensurate with their status. Wirral's economy has declined significantly and regeneration will take a long time to help its recovery. The visitor economy is a growth sector, with tourism, recreation and leisure dependent upon the continued protection and enhancement of the rural parts of the Borough. This combination leads to exceptional circumstances for the Council to adopt an alternative housing method. If the Council wrongly proceeds with the high housing requirement it will fail to properly have regard for environmental impacts, including the cumulative impacts of development. Please refer to our Housing Report, to the March 2020 update and our other attachments.						
1248472	LPIO-24004		Exceptional circumstances do not need to be demonstrated to justify a housing requirement higher than the standard method. The PPG explains 'circumstances' must exist to support a higher figure, whereas 'exceptional circumstances' must exist for a lower figure. The PPG allows authorities to take the need for affordable housing into account and establish a higher level of need than the standard method suggests.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823				
1248487	LPIO-24062		We are not aware of any exceptional local circumstances which would justify a deviation from the use of the standard methodology as a means for calculating the minimum housing need. We consider it of the utmost importance that the standard methodology is used as a baseline for determining the minimum housing requirement.	https://wirral-consult.objective.co.uk/file/5656330	https://wirral-consult.objective.co.uk/file/5656329				
1237647	LPIO-241	no							

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1247798	LPIO-24226		The lack of new housing delivery during the time in which the Interim Housing Policy (2005-2012) was in place means that there remains a significant unmet demand for market and affordable housing in the Borough. It is unclear what, if any, further adjustment has been made to the housing requirement to factor in future economic growth in the Borough. It is imperative that the emerging Local Plan delivers sufficient new housing to support the economic growth of the Borough. Whilst it is noted that the SHMA 2020 does not consider that an uplift to the housing requirement should be advanced having regard to past delivery levels, it should be noted that delivery levels in the Wirral since 2005 have been significantly impacted by the Council's Interim Housing Policy, the economic recession of 2008, and the lack of available land on which to deliver owing to the tight Green Belt constraints across the Borough and the continued absence of an up-to-date Local Plan. The net housing completions during the UDP period 1986 to 2001 demonstrate that housing delivery is capable of being much higher than the net average of 544 dwellings per year over the last five years, and there is developer appetite to build new homes in the Borough. Accordingly, the Council should have regard to these mitigating factors and historic delivery rates to ensure that the final housing requirement set out in the emerging Local Plan is capable of meeting the economic needs and growth potential of the Borough over the next 15 years.	https://wirral-consult.objective.co.uk/file/5684846					
1248551	LPIO-24407		An increase in the total housing requirement included in the plan should be considered where it could help deliver the required number of affordable homes.	https://wirral-consult.objective.co.uk/file/5655918					
1248588	LPIO-24592		There are exceptional local circumstances for deviating from the standard method for calculating local housing need. The standard method only results in the minimum amount of housing needed. The Government is already committed to revising the standard method so that it results in a national figure of 300,000 dwellings per year. The current method only results in a figure of around 265,000 dwellings per year nationally. There has been a history of under delivery in Wirral. The average rate of delivery over the period 1 April 2001 to 31 March 2018 has been 322 dwellings. Regard should be had to the 2016 and 2020 Strategic Housing Market Assessments (SHMAs) and the adverse impacts which would be generated by planning for a figure less than that required to meet needs, including affordable housing need of 705 new homes per year and the need for specialist (C2) homes.	https://wirral-consult.objective.co.uk/file/5681617					
1242697	LPIO-24639		It is critical that Household Projections (HPs) are based on recent and suitable population projections (PPs). The 2014 and 2016 PPs for Wirral differ considerably, in overall number and age profile. The 2016 PPs are modelled on more recent demographic change and longevity changes. The 2016 based projections offer a more realistic projection from past trends while the 2014 projections are wrong in that they overstate natural change and hence mislead about future levels of it. The attached documents explore in detail the impact of the 2016 data compared with 2014 data on both population and household projections. Any HPs should be based on the 2016 PPs. Further analysis is set out in the attached documents.	https://wirral-consult.objective.co.uk/file/5659118	https://wirral-consult.objective.co.uk/file/5659119	https://wirral-consult.objective.co.uk/file/5659120	https://wirral-consult.objective.co.uk/file/5659121		
1248749	LPIO-24805		Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.	https://wirral-consult.objective.co.uk/file/5684847	https://wirral-consult.objective.co.uk/file/5684848	https://wirral-consult.objective.co.uk/file/5684845			

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1248769	LPIO-24930		Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirkby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.	https://wirral-consult.objective.co.uk/file/5659045	https://wirral-consult.objective.co.uk/file/5684957	https://wirral-consult.objective.co.uk/file/5659039	https://wirral-consult.objective.co.uk/file/5659038	https://wirral-consult.objective.co.uk/file/5684956	
1248823	LPIO-25031		Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirkby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.	https://wirral-consult.objective.co.uk/file/5674317	https://wirral-consult.objective.co.uk/file/5684865	https://wirral-consult.objective.co.uk/file/5684849			
1248832	LPIO-25135		Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirkby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.	https://wirral-consult.objective.co.uk/file/5684857	https://wirral-consult.objective.co.uk/file/5659562				

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1248833	LPIO-25245		<p>Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.</p>	https://wirral-consult.objective.co.uk/file/5661125	https://wirral-consult.objective.co.uk/file/5661100	https://wirral-consult.objective.co.uk/file/5661124	https://wirral-consult.objective.co.uk/file/5661129		
1244896	LPIO-2526	yes	<ol style="list-style-type: none"> 1. The huge difference between the 12,000 formula figure and Wirral's actual Need, which is nearer 3,000, is an exceptional circumstance in itself, sufficient enough to trigger the challenge and to base the Local Plan on a lower figure. The 3,000 figure comes from the Council's own statistics and other official public records. It is also supported by experts employed by the Council (Liverpool and Manchester Universities) and by two local highly qualified experts who are members of the Group of 20+ Wirral community, environmental and other societies; also by others. 2. Wirral's population has basically flat-lined for years and growth in population or the local economy does NOT support a higher figure. There is a NIL chance of 12,000 being correct nor is Wirral about to be invaded by 20 to 30 thousand people. It is nonsense to suggest this and our Council knows it. Does it still want green belt development for the money? Local statistics provide exceptional circumstances. 3. Wirral's Green Belt was tightly drawn around existing areas of housing specifically to address the overriding demand and need which was Regeneration ... Insufficient space so please see the attached File: LP Consultation Feb2020 - ITPAS20 - Q2.2a 	https://wirral-consult.objective.co.uk/file/5677267					
1248546 Wirral Wildlife	LPIO-2532	yes	<p>Wirral is already 45% urban development, and the wildlife is spread across the remaining coast and countryside, with pockets within the urban area itself. In the Development Options Review in 2018, of the 54 parcels of Green Belt land considered for release, we (Wirral Wildlife) objected to 48 out of the 54 because wildlife would be harmed. In the current ARUP review, out of the "weakly-performing sites" (10 put forward for release and 33 others), there are serious objections on wildlife grounds to 22, concerns about wildlife impacts on another 10. Intensive development in the existing urban area carries less dangers, but there are implications from greatly increased numbers of people for the Dee and Mersey Estuaries, North Wirral Foreshore, Mersey Narrows and for the urban wildlife sites, parks and green spaces. All would suffer increased disturbance from noise, light, recreation, pollution, etc (Habitats Regulations Assessment 5.9). Mersey Narrows and North Wirral Foreshore are already in the worst 5 Habitat Sites for vulnerability to recreational pressure (HRA 5.10, 5.21-5.25). Under paragraph 11b of the NPPF there is provision for limiting the overall scale of development in a plan area. We therefore argue that Wirral does not have the capacity for the 800/year originally proposed, and according to ONS 2018 figures Wirral does not need such amounts. We therefore submit that any Green Belt release should be phased to not occur until at least the last stage of the plan period (11-15 years), and only when 90% of the available brownfield and urban sites have been built. This is in agreement with the provisions of the NPPF [137] for using brownfield land in preference and phasing of release of development areas [139]. Such phasing would allow the 5-yearly review to decide which of the numbers proposed are really necessary, or achievable in the financial climate then obtaining.</p>						
1248956	LPIO-25347 1 of 2		<p>There are exceptional circumstances to go beyond the minimum standard method and to plan for a higher housing requirement in Wirral. The standard method must be treated as the minimum starting point. The Council then needs to consider whether achieving the minimum standard method figures provides for a sufficiently 'positive' and flexible plan that would meet the needs of the area and the needs of all forms of development. The lack of an up to date Local Plan over the last 20 years and tight Green Belt boundaries have had an impact on delivery and will have an impact on the standard method calculation, through past trends. The Liverpool City Region (LCR) has a devolution agreement to promote economic growth, committing an extra £900million of funding over the next 30 years. The LCR Growth Strategy 2016, aspires to over 100,000 additional jobs by 2040 and to increase businesses by 20,000 over the next 25 years, and support an additional 50,000 people coming to live in the LCR by 2040. The LCR is subject to major strategic infrastructure investment such as the Liverpool / Superport initiative, with phase one having opened in 2016 creating a deep-water container terminal creating the UK's largest transatlantic port and a phase two in the pipeline; the £600m Mersey Gateway Crossing; new railway stations planned at Kirby and the Baltic Triangle; and new Merseyrail trains to serve the area including Wirral. Recent economic growth has created an additional 40,300 jobs within the LCR between 2016-18 (representing 6.0% growth compared to a UK average of 1.4%), which the standard method does not take into account. Wirral may need to accommodate some of Liverpool's housing needs, when the Mayor's Spatial Development Strategy is advanced, given the geographical relationship and Liverpool's lack of suitable land for family housing. Wirral's own forecast and planned jobs growth should be reflected.</p>	https://wirral-consult.objective.co.uk/file/5677474	https://wirral-consult.objective.co.uk/file/5684859				

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1248956	LPIO-25347 2 of 2		Our assessment indicated that a requirement based on the standard method would only support 101 jobs per annum, significantly less than the Council forecasts and significantly less than the increase in jobs achieved between 2016-18. Even the lower range of the Council's Strategic Housing Market Assessment (SHMA) 2016 is above the standard method. Past trends have seen a complete reverse in the outflow and inflow of internal migrants to the LCR, which is not picked up by the standard method and 2014-based household growth projections. 800 dwellings per annum (dpa) will fail to address affordable housing need, which the 2020 SHMA identifies at 705 dpa. An alternative housing target based on our demographic modelling set out in our attachment indicates up to 1,300 dwellings per annum would be needed. Our submission to the Mayor's Spatial Development Strategy, attached, considers the implications of the jobs growth forecast of 0.7% per annum set out in the LCR Strategic Housing and Employment Land Market Assessment (SHELMA), which would lead to 556 new jobs being created in Wirral per annum. To support this level of growth, Wirral would need to accommodate 1,539 dwellings per annum (dpa). We acknowledge this would require a significant step change in delivery but suggest a stepped approach, to accommodate 328 new jobs and 1,169 dpa, under the proviso that the Council would achieve circa 1,500 dpa in the latter parts of the plan period.						
1248986	LPIO-25441		Exceptional local circumstances that would indicate the need for a greater housing need requirement include: The Wirral Growth Strategy 2016; the Wirral Growth Company, involved in the regeneration and growth of Birkenhead; the devolution agreement to promote economic growth and the powers given to the Liverpool City Region (LCR) Mayor, including an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) to 'help accelerate economic growth and housing development throughout the City'; the LCR Growth Strategy 2016, to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and an additional 50,000 people coming to live in the LCR by 2040.; major strategic infrastructure investment such as Liverpool / Superport initiative, creating the UK's largest transatlantic port, with Phase 2 in the pipeline, the £600m Mersey Gateway Crossing, new railway stations planned at Kirby and the Baltic Triangle and new Merseyrail trains to serve the area including Wirral; significant economic growth within the LCR, which created an additional 40,300 jobs between 2016-18, representing 6.0% growth compared to a UK average of 1.4% - as the second largest economy and second largest residential conurbation in the LCR it is likely that this growth will have large impacts on Wirral's housing requirement; from 2009-2014 there was large levels of annual migration out of the LCR, which since 2015 has switched to substantial flows of in-migration to the LCR brings an increased housing need which is not covered by the ONS housing projections; the need to accommodate some of Liverpool's housing needs when the LCR Strategic Development Plan is advanced, given the geographical relationship, Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; the annual housing need for Wirral of 855-1,185 homes shown in the LCR SHELMA 2016, significantly greater than the ONS figure; the prolonged lack of an up to date Local Plan and tight Green Belt boundaries, which have had an impact on the delivery of new homes and the past trends used within the standard method calculation; the scale of the SHMA affordable housing need of 705 dpa; and persistent under delivery of housing between 2,354 and 3,479 dwellings since 2003 based on RSS requirements and the annual requirement set out in the Council's 2016 SHMA from 2014/15.	https://wirral-consult.objective.co.uk/file/5662723	https://wirral-consult.objective.co.uk/file/5662725	https://wirral-consult.objective.co.uk/file/5662770			
1249100	LPIO-25838 1 of 3		There are exceptional circumstances to go beyond the minimum standard method and to plan for a higher housing requirement in Wirral. The standard method must be treated as the minimum starting point. The Council then needs to consider whether achieving the minimum standard method figures provides for a sufficiently 'positive' and flexible plan that would meet the needs of the area and the needs of all forms of development. The lack of an up to date Local Plan over the last 20 years and tight Green Belt boundaries have had an impact on delivery and will have an impact on the standard method calculation, through past trends. The Liverpool City Region (LCR) has a devolution agreement to promote economic growth, committing an extra £900million of funding over the next 30 years. The LCR Growth Strategy 2016, aspires to over 100,000 additional jobs by 2040 and to increase businesses by 20,000 over the next 25 years, and support an additional 50,000 people coming to live in the LCR by 2040.	https://wirral-consult.objective.co.uk/file/5677514	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5684898	https://wirral-consult.objective.co.uk/file/5677509	https://wirral-consult.objective.co.uk/file/5684951	
1249100	LPIO-25838 2 of 3		The LCR is subject to major strategic infrastructure investment such as the Liverpool2 / Superport initiative, with phase one having opened in 2016 creating a deep-water container terminal creating the UK's largest transatlantic port and a phase two in the pipeline; the £600m Mersey Gateway Crossing; new railway stations planned at Kirby and the Baltic Triangle; and new Merseyrail trains to serve the area including Wirral. Recent economic growth has created an additional 40,300 jobs within the LCR between 2016-18 (representing 6.0% growth compared to a UK average of 1.4%), which the standard method does not take into account. Wirral may need to accommodate some of Liverpool's housing needs, when the Mayor's Spatial Development Strategy is advanced, given the geographical relationship and Liverpool's lack of suitable land for family housing. Wirral's own forecast and planned jobs growth should be reflected. Our assessment indicated that a requirement based on the standard method would only support 101 jobs per annum, significantly less than the Council forecasts and significantly less than the increase in jobs achieved between 2016-18.	https://wirral-consult.objective.co.uk/file/5677510	https://wirral-consult.objective.co.uk/file/5684895	https://wirral-consult.objective.co.uk/file/5677508	https://wirral-consult.objective.co.uk/file/5677511	https://wirral-consult.objective.co.uk/file/5677513	
1249100	LPIO-25838 3 of 3		Even the lower range of the Council's Strategic Housing Market Assessment (SHMA) 2016 is above the standard method. Past trends have seen a complete reverse in the outflow and inflow of internal migrants to the LCR, which is not picked up by the standard method and 2014-based household growth projections. 800 dwellings per annum (dpa) will fail to address affordable housing need, which the 2020 SHMA identifies at 705 dpa. Our submission to the Mayor's Spatial Development Strategy, attached, considers the implications of the jobs growth forecast of 0.7% per annum set out in the LCR Strategic Housing and Employment Land Market Assessment (SHELMA), which would lead to 556 new jobs being created in Wirral per annum. To support this level of growth, Wirral would need to accommodate 1,539 dwellings per annum (dpa). We acknowledge this would require a significant step change in delivery but suggest a stepped approach, to accommodate 328 new jobs and 1,169 dpa, under the proviso that the Council would achieve circa 1,500 dpa in the latter parts of the plan period. An alternative housing target based on our demographic modelling set out in our attachment indicates up to 1,300 dwellings per annum would be needed.	https://wirral-consult.objective.co.uk/file/5677516	https://wirral-consult.objective.co.uk/file/5677507	https://wirral-consult.objective.co.uk/file/5684949			

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1249100	LPIO-25838 1 of 3	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.	https://wirral-consult.objective.co.uk/file/5677514	https://wirral-consult.objective.co.uk/file/5677512	https://wirral-consult.objective.co.uk/file/5684898	https://wirral-consult.objective.co.uk/file/5677509	https://wirral-consult.objective.co.uk/file/5684951	
1249100	LPIO-25838 2 of 3	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.	https://wirral-consult.objective.co.uk/file/5677510	https://wirral-consult.objective.co.uk/file/5684895	https://wirral-consult.objective.co.uk/file/5677508	https://wirral-consult.objective.co.uk/file/5677511	https://wirral-consult.objective.co.uk/file/5677513	
1249100	LPIO-25838 3 of 3	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.	https://wirral-consult.objective.co.uk/file/5677516	https://wirral-consult.objective.co.uk/file/5677507	https://wirral-consult.objective.co.uk/file/5684949			
1249116	LPIO-25917		The standard method set out in the Planning Practice Guidance is a minimum starting point only. In Wirral, exceptional circumstances exist for an uplift to be applied. It is entirely appropriate to plan for a higher housing need figure than the standard method indicates.	https://wirral-consult.objective.co.uk/file/5674092	https://wirral-consult.objective.co.uk/file/5674093	https://wirral-consult.objective.co.uk/file/5674095	https://wirral-consult.objective.co.uk/file/5674096	https://wirral-consult.objective.co.uk/file/5684833	https://wirral-consult.objective.co.uk/file/5684836
1237944	LPIO-260	no							
1249116	LPIO-26018		The standard method set out in the Planning Practice Guidance is a minimum starting point only. In Wirral, exceptional circumstances exist for an uplift to be applied. It is entirely appropriate to plan for a higher housing need figure than the standard method indicates.	https://wirral-consult.objective.co.uk/file/5684802	https://wirral-consult.objective.co.uk/file/5684835	https://wirral-consult.objective.co.uk/file/5677041	https://wirral-consult.objective.co.uk/file/5677037	https://wirral-consult.objective.co.uk/file/5684804	
1249271	LPIO-26113 (1 of 4)		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.	https://wirral-consult.objective.co.uk/file/5677492	https://wirral-consult.objective.co.uk/file/5678239	https://wirral-consult.objective.co.uk/file/5678247	https://wirral-consult.objective.co.uk/file/5684889	https://wirral-consult.objective.co.uk/file/5678241	https://wirral-consult.objective.co.uk/file/5678248
1249271	LPIO-26113 (2 of 4)		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.	https://wirral-consult.objective.co.uk/file/5677491	https://wirral-consult.objective.co.uk/file/5677493	https://wirral-consult.objective.co.uk/file/5678242	https://wirral-consult.objective.co.uk/file/5684854	https://wirral-consult.objective.co.uk/file/5678236	https://wirral-consult.objective.co.uk/file/5678244

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1249271	LPIO-26113 (3 of 4)		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.	https://wirral-consult.objective.co.uk/file/5677494	https://wirral-consult.objective.co.uk/file/5685010	https://wirral-consult.objective.co.uk/file/5678243	https://wirral-consult.objective.co.uk/file/5678240	https://wirral-consult.objective.co.uk/file/5677490	https://wirral-consult.objective.co.uk/file/5678246
1249272	LPIO-26113 (4 of 4)		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.	https://wirral-consult.objective.co.uk/file/5678238					
1249269	LPIO-26138		The Council must ensure that they robustly test whether there are any circumstances that indicate a higher figure above the standard method for calculating Local Housing Need (LHN) should be used. The 2020 Strategic Housing Market Assessment (SHMA) simply states that "...evidence of past delivery would suggest that the LHN is an ambitious target and further uplifts to the standard method figure are therefore, not recommended." There is also no further consideration of this matter within the Issues and Options document. Our attachment sets out the exceptional circumstances that may apply to justify an increase in the proposed housing requirement for Wirral, which include: Wirral's role in the City Region; the absence of a Local Plan and sites to deliver housing development; the need to support employment growth; and the extent of affordable housing need.	https://wirral-consult.objective.co.uk/file/5675699					
1249263	LPIO-26164		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.	https://wirral-consult.objective.co.uk/file/5684852					
1249309	LPIO-26190	no							
1249315	LPIO-26198		I understand you have at least 2 independent reports plus 2 further authoritative statements presented to you by Wirral Green Space Alliance, demonstrating that the demographic you rely on is erroneous. Hence there are exceptional local circumstances to warrant departure from the standard method and as our representatives you should fight our corner.						

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1249320	LPIO-26211		I believe you have received independent reports commissioned by Wirral B.C. plus 2 independent reports presented by Wirral Green Space Alliance which demonstrate that the current and future population figures for Wirral warrant contending that there are exceptional local circumstance to depart from the standard method. It is irresponsible in the light of this evidence not to so contend and may justify application for judicial review of you're failure to do so. Why destroy Green Belt land to build houses to satisfy developers and fill your coffers when the figures demonstrate it is unnecessary developments.						
1249321	LPIO-26222		Because there is not the evidence for Wirral needing 12,000 homes. The Council have made it clear that population growth of Wirral is low (only 100 between 1997 and 2007)						
1247414	LPIO-26237		Again can you justify any need for 12,000 homes against the back drop of very low growth on the Wirral. Also bearing in mind the drop in population growth which increased by 100 in ten years.						
1248490	LPIO-26333		The Practice Guidance states that an uplift should be applied where funding is in place to promote and facilitate growth. Wirral Waters represents one of the largest regeneration projects in the UK with the potential to create up to 20,000 jobs through a mixed-use sustainable development, with housing likely to play a key role in supporting this. By any measure, this significant economic potential represents a departure from the 'business as usual' trend based demographic growth that the LHN represents and meets the exceptional circumstances test set in the Framework that mean that it would be appropriate to plan for a higher housing need figure than the standard method indicates.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684853
1248490	LPIO-26334		An annual housing requirement of 800 dpa is insufficient to meet housing needs in Wirral and exceptional circumstances exist to move away from the minimum starting point. An uplifted housing target in the range of between 1,045 dpa to 1,300 dpa would allow for the improvement of negatively performing market signals through the provision of additional supply, help to meet affordable housing needs and support economic growth. Using a figure within this range would ensure compliance with the Framework by significantly boosting the supply of housing and ensuring that the planning system does everything it can to support sustainable development.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684853
1248490	LPIO-26335		Housing delivery in Wirral has been suppressed over a considerable period of time due to the lack of an up to date and adopted development plan. There is considerable developer appetite and market demand for additional housing in Wirral but a significant shortage of suitable sites on the market. Recent years has been characterised by low levels of housing delivery which is at variance with the achieved delivery rates prior to the last recession with 959 net completions in 2006/07 and 1,052 in 2007/08. The reason for this can be mainly attributed to the lack of an up to date and adopted development plan in place for Wirral over recent years. It is unsurprising that housing has slowed, not least because the Council's current UDP is now 19 years out of date. This has undoubtedly inhibited the delivery of readily-available sites.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684853
1248490	LPIO-26336		The Council's emerging WLP is failing to align economic and housing needs. The Council is targeting the provision of 80 hectares of B-Class employment land. This is almost double the 41 ha of B-Class land that their own evidence base suggests aligns with 737 dpa. It does not appear tenable that pursuing the LHN of 800 dpa could possibly sustain significant levels of employment growth, given that the 2014-based SNPP on which it is founded suggests that the working age population will fall by over 2,500 residents over the Plan period. In order to deliver 80 ha of employment land whilst retaining an aligned housing requirement, it is probable that the Council would need to effectively double its housing requirement.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684853
1248490	LPIO-26337		The WLPIO states that the Council's preferred approach will be to seek to achieve up to 30% affordable housing on all schemes of 10 or more dwellings. This would mean that, at best, and notwithstanding the challenging viability of brownfield sites in many parts of the Borough for delivering anywhere near that level of social housing, only 240 affordable homes could be delivered from an overall LHN of 800 dpa. This equates to only 34% of the affordable housing need identified in the Council's own SHMA 2020 evidence of 705 per annum. This suggests that there could be a justification for uplifting the housing need, particularly in the short term. This is only justified if the affordable housing need figure is correct. We also have concerns regarding elements of the methodology in the SHMA that could justify a higher affordable housing need figure. Further comments have been submitted on the SHMA 2020.	https://wirral-consult.objective.co.uk/file/5676992	https://wirral-consult.objective.co.uk/file/5673252	https://wirral-consult.objective.co.uk/file/5673251	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684856	https://wirral-consult.objective.co.uk/file/5684853
1245180	LPIO-2640	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1249761	LPIO-26405		It is important to note that the draft SHMA, which has been published in support of the emerging Local Plan, identifies an annual shortfall of 705 affordable dwellings across the Borough. This comprises some 90 per cent of the current LHN upon which the emerging Local Plan is based. The Council's own evidence therefore points towards the requirement for a substantial uplift in the housing requirement currently being progressed within the emerging Local Plan. In addition to the need to apply an uplift to the minimum LHN figure, based on the Council's own evidence on affordable housing needs, the housing requirement which is advanced in the emerging Local Plan should also ensure alignment with the economic aspirations of the Local Plan and the wider Liverpool City Region. We note that the Baseline Scenario contained within the LCR Strategic Housing and Employment Land Market Assessment (SHELMA) identifies that up to 6,600 additional FTE jobs could be created in Wirral by 2037, with up to 11,500 FTE jobs created under a Growth Scenario, based on the improved performance of local growth sectors and identified development projects. It is important to ensure that the emerging Local Plan allows for sufficient homes of the right types and in the right places to be developed, to ensure that these economic growth aspirations can be fully realised.	https://wirral-consult.objective.co.uk/file/5684814	https://wirral-consult.objective.co.uk/file/5684810				

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1249782	LPIO-26413 1 of 2		In relation to the NPPF's requirement to provide flexibility and the preparation of a positive plan, there are a number of exceptional circumstances that apply to Wirral within the context of how long it has taken to produce this emerging Local Plan. The Wirral is one of just a handful of local authorities that has been put under the threat of special measures by Government to get their Local Plan adopted quickly due to the age of the current adopted UDP. This is an exceptional position to be in. The Borough has been without an up to date plan since 2001 and therefore at least two decades will have passed until this new Local Plan is adopted. The length of time spent without an up to date Local Plan has led to a 'black hole' in progressive planning policy terms within Wirral. This is exceptional. The preparation of a new development plan first started in 2005, which led to a Submission Draft Core Strategy in 2012. Now fifteen years on, there is still some way to go before the Council have a new Local Plan in place. Again, this is an exceptional timeframe associated with the production of a new Local Plan. Such delays have no doubt been caused by a number of factors, which may include a lack of funding, expertise, political will, political impasse, constant changes to national, regional or sub-regional policies or a host of other reasons. Whatever the reasons, we do recognise that Wirral are now moving forward with their Local Plan and support and commend this, but the above demonstrates that it can take an inordinate amount of time in certain locations and under certain circumstances to deliver a new Local Plan. In the context of Wirral, the timeframes and circumstances appear exceptional and Wirral is no different to any other Local Authorities in the country who have managed to prepare an up to date Local Plan. Whilst there are evident reasons for such delays in the plan-making process, these should not be viewed as mitigating factors to justify a do minimum approach to the plan making process, including adopting a 15-year plan period going forward. Political and resourcing reasons aside, the current plan making process is amidst a backdrop of an acute housing crisis, with well-documented challenges for the younger generations ability to get on to the property ladder. This is why we strongly advocate that the Council considers extending the plan period beyond the minimum 15-year time period. The NPPG also provides useful guidance on the use of the standard housing method and highlights a number of other circumstances that should be considered. It states the following under the question 'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?': [NPPG Paragraph: 010 Reference ID: 2a-010-20190220 Quoted] In the context of this Local Plan and the NPPG guidance, the following exceptional circumstances exist:	https://wirral-consult.objective.co.uk/file/5683892					
1249782	LPIO-26413 2 of 2		The lack of an up to date Local Plan for the area over the last 20 years and tight Green Belt boundaries around the main settlement areas has had an impact on the delivery of new homes. The standard method is geared on past trends of housing delivery so this will have an impact on the standard method calculation. Wirral is part of the LCR which as has a devolution agreement to promote economic growth and powers have been provided to the LCR Mayor to facilitate this. Whilst this is becoming more common for certain locations, it is still an exceptional circumstance, when compared to most planning authorities. The original devolution deal committed an extra £900million of funding over the next 30 years through the Single Investment Fund (SIF) and a key obligation associated with that was for the LCR Mayor to exercise powers (including planning powers) to 'help accelerate economic growth and housing development throughout the City.' As part of the LCR Growth Strategy, published in 2016, there is an aspiration to create over 100,000 additional jobs by 2040, an increase in 20,000 businesses over the next 25 years, and support an additional 50,000 people coming to live in the LCR by 2040. The LCR is subject to major strategic infrastructure investment such as Liverpool2 / Superport initiative, with Phase 1 having opened in 2016 creating a deep-water container terminal creating the UK's largest transatlantic port and a Phase 2 in the pipeline; the £600m Mersey Gateway Crossing; new railway stations planned at Kirkby and the Baltic Triangle; and new Merseyrail trains to serve the area including Wirral. Wirral may need to accommodate some of Liverpool's housing needs as and when the LCR Strategic Development Strategy is advanced, particularly given the geographical relationship of Wirral adjacent to Liverpool and Liverpool's tight geographical/political boundaries and lack of suitable land for family housing; Wirral's own forecast and planned jobs growth through the Local Plan is high and this should be reflected in required housing provision. If the Council apply the standard method requirement, our own assessment indicated that this would only support a workplace employment change of 101 jobs per annum. This is significantly less than what the Council forecast in terms of jobs growth and is significantly less than Wirral's 12.7% total jobs growth change achieved between 2016-18. The Council's 2016 SHMA confirmed there was a need for between 875-1,235 dwellings per annum required. Even the lower end of this range is above the standard method.						
1249812	LPIO-26507		It is our view that the Council should reflect the existing shortfall within calculating their housing requirement, including an uplift to address the existing shortfall, rather than simply claim that the proposed target is already ambitious. The current approach is flawed and does not engage with principles of positively preparing a Local Plan. It is our view that the Council are seeking to dilute the housing requirement and essentially wipe out over 15 years of historic under delivery. Wirral's poor delivery and existing significant shortfall justifies 'exceptional circumstances' to depart from the standardised methodology in order to propose a higher level of development. This process has been implemented by a number of authorities who are currently preparing a new Local Plan or have already submitted for Examination. As of September 2019, 11 local authorities had submitted a Local Plan to the Secretary of State with a further 53 authorities outlining housing requirements within emerging policy documents, of these, 22 authorities chose to plan for additional growth in order to dispel past rates of below target delivery. In light of the above, the Wirral has not positively planned to deliver its housing requirement. The figure of 800 dwellings per annum is artificially low and fails to attempt to deliver any previous shortfall. Little justification is given for adopting this approach. The Council should depart from the standardised methodology of calculating supply in order to propose an OAN of a minimum of 880 dwellings per annum in order to meet current housing need and reduce the historic shortfall, ie an uplift of 10%.	https://wirral-consult.objective.co.uk/file/5684813	https://wirral-consult.objective.co.uk/file/5684811	https://wirral-consult.objective.co.uk/file/5684812			

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1246736	LPIO-26556 1 of 2	yes	There are exceptional local circumstances from deviating from the standard method for calculating local housing need. Firstly, the standard method only results in the minimum amount of housing needed. Paragraph 60 of the Framework states: "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (emphasis added) Paragraph 2a-002 of the PPG2 states that the Framework expects strategic policy-making authorities to follow the standard method for assessing local housing need. However, the PPG goes on to state that the standard method "identifies a minimum annual housing need figure. It does not produce a housing requirement figure." As such, local housing need does not translate directly into the housing requirement for an area, rather it provides a minimum starting point. Therefore, the proposed housing requirement of 800 dwellings per annum is based on the bare minimum amount of housing need for the Borough. This is not consistent with the objective of national policy to significantly boost the supply of homes. Secondly, the Government is already committed to revising the standard method so that it results in a national figure of 300,000 dwellings per year. The current method only results in a figure of around 265,000 dwellings per year nationally. "Planning for the Future" (March 2020) states that the Government will be: "Reviewing the formula for calculating Local Housing Need – we will introduce a new approach which encourages greater building within and near to urban areas and makes sure the country is planning for the delivery of 300,000 new homes a year" Therefore, by proposing the bare minimum housing required, the plan is at risk of being found unsound when the revised standard method is introduced. Thirdly, there are local circumstances, which justify an alternative approach, which results in a higher figure. Paragraph 2a-010 of the PPG3 considers when it might be appropriate to plan for a higher housing need figure than the standard method indicates. It states: "The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.	https://wirral-consult.objective.co.uk/file/5681309					
1246736	LPIO-26556 2 of 2		It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates." Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of: * growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); * strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or * an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests." There has been a history of under delivery in Wirral. The delivery rates are shown in the table in the attachment. The Annual Monitoring Report (AMR 2018) confirms that the average rate of delivery over the period 1st April 2001 to 31st March 2018 has been 322 dwellings. The low level of completions in the Wirral is partly explained due to the lack of available land due to constraints such as the Green Belt as we discuss elsewhere in our representations. However, the shortfall accumulated against the applicable housing requirements is very significant, and considerably greater than the uplift provided by the application of the affordability adjustment in the standard method of around 100 homes per annum.						
1246736	LPIO-26557	yes	The Strategic Housing Market Assessment (SHMA, Arc4, January 2020) does not provide an alternative assessment of need. It only uses the standard method to calculate housing need. However, the previous SHMA was recently produced in 2016. It concluded that the resultant (rounded) Objectively Assessed Need (OAN) ranges of 875 to 1,235 dwellings per annum to 2032, and 855 to 1,185 dpa dwellings per annum to 2037 as set out in the Strategic Housing Market Assessment (SHMA, 2016). This is significant because the 2016 SHMA concluded that any figure below the ranges identified would result in adverse impacts in terms of addressing affordable housing needs and a reduction of jobs. Within the context of paragraph 2a-010 of the PPG, it is a recently produced SHMA which concludes that the housing need is significantly greater than the outcome of the standard method. Whilst it does not depart from the standard method in terms of identifying housing need, the 2020 SHMA identifies that the net affordable housing shortfall in Wirral is 705 dwellings, which equates to 10,575 (net) over the plan period. This represents 88% of the overall requirement of 12,000 as proposed. There is no prospect of achieving this level of affordable housing in the context of the proposed housing requirement. Paragraph C.45 of the SHMA states: "C.45 The overall gross imbalance across Wirral Borough is 1,489 affordable dwellings each year. After taking into account supply of affordable accommodation, the net imbalance is 705 each year. This justifies a continued need for a robust affordable housing policy." The scale of need is so significant that an uplift in the housing requirement is the only logical response. The response must be to significantly boost the release of viable and deliverable open-market schemes to bridge the gap, and meet the identified need for affordable homes. The release of greenfield and Green Belt land is the only logical way to deliver policy compliant affordable housing across the Wirral and sites should only be allocated on the basis that demonstrate they can deliver the required level. The 2020 SHMA also identifies a need for 1,330 C2 units in addition to the number of dwellings calculated by the standard method. Therefore, the Council's own evidence base indicates that the housing requirement should be significantly higher than the 800 dwellings per annum figure the Council is currently relying on.	https://wirral-consult.objective.co.uk/file/5681308					
1245058	LPIO-2658	yes	Local demographic trends as noted in Wirral Compendium of Statistics (The population of Wirral is projected to increase by just 1.6% overall by 2039 according to the Office for National Statistics, from 323,200 to 328,500)						

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1240932	LPIO-26583		Yes, we believe there are exceptional circumstances to deviate from the standard method for calculating LHN in accordance with the provisions of paragraph 60 of the Framework. The Government is clear that the figure derived from the standard method is intended to be a minimum figure, population changes are only one aspect of the driver for housing demand and the standard method does not attempt to predict the impact of government and local policies, changing economic circumstances or other factors. A detailed consideration of the exceptional circumstances which can currently be found in Wirral are outlined in the attached Technical Assessment which reveals three main factors. Firstly, projections show that Wirral faces some stark demographic issues over the years ahead and the Council needs to encourage higher levels of net inward migration amongst economically active age groups if it is to support a healthy economy in the years to come. Secondly, housing in Wirral is comparatively unaffordable and should this continue, fewer Wirral residents will be able to get on the housing ladder in future. The Council's approach therefore must align with the Government's objective of significantly boosting the supply of homes in sustainable and viable locations and the Local Plan needs to provide more than the minimum required of the Borough. Thirdly, we are also concerned that the Council's ambitious targets for economic growth and that the much-increased provision of employment land outlined in the draft Local Plan will not be adequately supported by the requisite level of appropriate family and affordable housing across the Borough should the Council adopt a standard 'business as usual' minimum housing requirement.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701			
1249947	LPIO-26657		It is important to note that the draft SHMA, which has been published in support of the emerging Local Plan, identifies an annual shortfall of 705 affordable dwellings across the Borough. This comprises some 90 per cent of the current LHN upon which the emerging Local Plan is based. The Council's own evidence therefore points towards the requirement for a substantial uplift in the housing requirement currently being progressed within the emerging Local Plan. In addition to the need to apply an uplift to the minimum LHN figure, based on the Council's own evidence on affordable housing needs, the housing requirement which is advanced in the emerging Local Plan should also ensure alignment with the economic aspirations of the Local Plan and the wider Liverpool City Region. We note that the Baseline Scenario contained within the LCR Strategic Housing and Employment Land Market Assessment ('SHELMA') identifies that up to 6,600 additional FTE jobs could be created in Wirral by 2037, with up to 11,500 FTE jobs created under a Growth Scenario, based on the improved performance of local growth sectors and identified development projects. It is important to ensure that the emerging Local Plan allows for sufficient homes of the right types and in the right places to be developed, to ensure that these economic growth aspirations can be fully realised. There is a disconnect between the minimum housing needs figure that the Council is currently pursuing and meeting the Borough's suppressed affordable needs along with the region's economic growth ambitions. The Council should therefore ensure that such matters are fully accounted for whilst formulating an appropriate housing requirement, which is cognisant of local circumstances.	https://wirral-consult.objective.co.uk/file/5683693					
1245073	LPIO-2682	yes	After some Google searching, I did eventually find three studies commissioned by the Council with experts at the Universities of Liverpool and Manchester. Despite being relatively recent documents, these were archived (hidden?) on the Council planning web site with much older material and they were not included in the list of evidence base documents. Why? Probably because both organisations concluded that the Office of National Statistics (ONS) 2016 projections were both "robust and internationally accepted" and implied between 6,100 and 7,100 new homes would be required on Wirral between 202-2035, and recommended the Council should consider a baseline figure of 430 dwellings per annum on average. I do not accept the Council's arguments for dismissing these reports. The Standard Method does not have to be applied if exceptional local circumstances can be demonstrated. Public submissions and two academic institutions have all come up with estimates around half of that projected by the Standard Method. This surely demonstrates that exceptional circumstances must exist. If not, where is the evidence that it doesn't? Over egging the targets to make up for historic under-delivery is nonsense. Targets have to be realistic otherwise you are simply setting yourselves up for failure yet again. Realistic targets will lead to a realistic plan. There is no evidence that building more homes will bring the price down to combat declining affordability. Indeed, the Manchester study concludes that suppressed demand rather than an increase in ability to buy or occupy housing is more likely and may reduce the housing need to 250 dwellings per annum in 2020 -2035. For those that are interested the University studies can be found at: https://www.wirral.gov.uk/planning-and-building/local-plans-and-planning-policy/local-planning-evidence-and-research-report-13						
1241891	LPIO-274	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100						
1245159	LPIO-2951	yes	ONS base information used for the calculation of trends and forecasts are overstated and therefore the forecast need is less.						
1244896	LPIO-3010	yes	Additional Response to Q2.2 The failure of the Council to adopt a realistic Locally Assessed Housing Need (as directed to by successive Secretaries of State and prevailing circumstances) when there are sufficient grounds and 'exceptional circumstances' have been demonstrated has been highlighted throughout our various Responses. We have referred assessors to a list of 'exceptional circumstances' in our earlier Responses but in addition we would refer assessors to a further Report produced by Graham Stevens, a Member of WGSAs (File Ref: Wirral Household Projections and Standard Method IOD). Please take account of the section relevant to this Question.	https://wirral-consult.objective.co.uk/file/5677108					
1245289	LPIO-3015	yes	According to Wirral Intelligence Service (part of Wirral Council) Wirral has: 1) a higher proportion of older people and a lower proportion of working age people compared to England. 2) the population is projected to increase by 1.6% overall by 2039 according to the Office for National Statistics. 3) This small overall increase hides large variation by age, with the population of children and young people decreasing by -7.2% while the population of older people aged 90+ is projected to increase by 103%. Based on this I don't understand why we would need the housing stock to increase by nearly 9%						

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1241315	LPIO-3019	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1238645	LPIO-3054	yes	Local demographic trends - as noted in Wirral Compendium of Statistics						
1237904	LPIO-3141	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245311	LPIO-3199	yes	As per 2.1a. The methodology used as a matter of course gets to an answer but not necessarily the appropriate one. If this isn't a case to use exceptional circumstances its not clear what is.						
1245311	LPIO-3204	yes	As per 2.1a. The methodology used as a matter of course gets to an answer but not necessarily the appropriate one. If this isn't the instance to use 'exceptional circumstances. it is not clear what is.						
1245320	LPIO-3214	yes	Evidence provided by experts at Liverpool and Manchester universities, and local experts has been provided to the council. This should provide evidence for exceptional circumstances. The council's current proposal to consider release of green belt is at variance with the chancellor's financial support for preservation of green belt in yesterday's budget.						
1245158	LPIO-3218	yes	regeneration needs should be the priority - brownfield first. Wirrals actual need for houses is nearer 3000 than 12000 according to your statistics and expert comment						
1245346	LPIO-3244	yes	Local demographic trends as noted in Wirral Compendium of Statistics						
1244720	LPIO-3260	yes	Wirral is a small area which is already supporting a large population. We are a smaller borough than say, Halton, yet are proposing more new build homes than Halton. We have finite land available. Greenbelt in Wirral makes up less than 3/5 of the total area and has to be protected in order to retain the character of the borough, and to prevent urban sprawl. Wirral is adjacent to areas of special significance for wildlife such as the Dee Estuary, Hilbre, the Mersey Narrows, North Wirral foreshore and the Liverpool Bay and Alt Estuary. New development, and in some circumstances building on some brownfield eg the Wirral Waters site, will adversely impact wildlife. The above reasons, I believe are exceptional circumstances in which our area finds itself.						
1238549	LPIO-332	yes	Use of Green belt conflicts with housing needs for elderly who require housing closer to developed towns with good support infrastructure. The University and WGSA Experts all have advised the housing need, calculated using their formulae differs significantly (LESS) than the figures being used by the council. The figures suggest somewhere between 2,500 and 5,000 maximum. The council should regard this point as an Exceptional circumstance and demand that a more realistic figure as suggested is used to complete their plan.						
1239571	LPIO-3335	yes	There is a prior requirement to address deprivation and lift areas of Birkenhead and other parts of the eastern side of the peninsula through a clear focus on brown site regeneration. The higher figure of 12,000, forcing inclusion of green belt options, militates against this important focus and urgent priority.						
1245416	LPIO-3349	no							
1237823	LPIO-3378	no							
1241770	LPIO-3389	yes	Wirral's current population growth is not reflected in the housing need formula. Current empty housing stock needs to be considered and taken back into council ownership.						
1240653	LPIO-3404	yes	While the standard method is mandated by the National Government it results in targets that are clearly inappropriate for the local circumstances						
1245437	LPIO-3499	yes	The exceptional circumstance is that the Council's target of 12000 is wildly over inflated. Studies from the Universities of Manchester and Liverpool, as well as the council's own consultants, have show this figure is in fact far lower. Net growth between 1997 and 2017 was only 100.						
1245457	LPIO-3573	yes	Wirral has no need for 12000 new houses. The population was 334k in 1991, and has dropped since then to 323k in 2018. There are not 12000 job vacancies in Wirral or the Greater Merseyside region.						
1237667	LPIO-3657	yes	The change in circumstances identified by the reference to the recent reports from Liverpool University and local experts is quite clearly capable of being an exceptional circumstance. Whereas the population in the UK as a whole is increasing the population in Wirral is decreasing which again clearly results in the Wirral situation being exceptional. In many ways Wirral is quite unique. It is a finger peninsular between two large river estuaries, the Mersey to the east and the Dee to the west. The borough effectively has the sea on three sides with a narrow land link to other areas in the south. This location has played a major part in the way Wirral has developed over the centuries and has influenced the character of Wirral. The geographic location and nature of Wirral are important both when considering the housing "need" and the significance of the "Green Belt". It is fair to say that a significant proportion of the working population of Wirral commute to work elsewhere. The same may not be true when considering the leisure facilities offered including the substantial amenity of the "Green Belt" which attracts leisure visitors. It may be that the unique Wirral situation, bounded by water on 3 sides and with a reducing population also amounts to exceptional circumstances when considering the question of "need".						

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1245443	LPIO-3672	yes	we need to regenerate areas and update housing and amenities. Not destroy the green belt areas						
1245288	LPIO-3691	yes	The earliest evidence of human occupation of Wirral dates from the Mesolithic period, around 7000BC. Evidence from excavations at Greasby. Other evidence from the same period has been found at Irby, Meols, West Kirby and Hilbre too. This history is important to all and should be protected.						
1237827	LPIO-3763	no							
1245496	LPIO-3846	yes	Yes , there are exceptional circumstances for deviation from the standard method because there is no evidence to suggest Wirral needs 12000 homes. Wirral Borough Council have already made it clear there is very little growth in Wirral for either economic or population growth. Indeed between 1997 and 2017 population growth was only 100.						
1242359	LPIO-388		The Wirral is a small place with very limited industry. There are therefore not great job opportunities and hence little potential for population growth other than in the expensive areas along the Dee estuary. Urban regeneration for North Birkenhead is essential and many empty shops and small business premises could be used for housing areas. I see little in the plan that disturbs the quiet enjoyment of the landscape for the people who live along the Dee, whereas the lovely countryside along the Mersey, with outstanding views across to the heritage site of Liverpool would make perfect areas to live if infrastructure was improved. We are becoming a two speed economy, with expensive housing for professionals and those with good pensions and inadequate housing for the less well off. The greenbelt amenities along the Mersey side of the Wirral must not be touched as they go to improving the quality of life for the less well off.						
1245498	LPIO-3921	yes	Historically minimal population growth and no evidence of economic growth in the Merseyside region that would justify the forecasted level of population growth that would lead to a need for 12000 additional homes. WBC also have more up to date ONS data to apply to the formula rather than outdated 2014 figures they are using. Research has been conducted by respected academic experts at Liverpool and Manchester universities using official local data that evidences a far lower level of housing demand ie 2500-6000 new homes. Therefore I demand that WBC uses the lower range of figures rather than applies a standard generalised formula that doesn't account for the realities of the Wirral/Merseyside region. Legal advice provided to residents states that there is "exceptional circumstances" to justify challenge and a lower new homes target						
1245500	LPIO-3935	yes							
1245501	LPIO-3950	yes	There is no credible evidence to suggest that Wirral needs the 12,000 homes proposed. Wirral Borough Council have already communicated very low growth for both economic and population growth, e.g. between 1997 and 2017 population growth was just low compared to Liverpool or Manchester. Therefore, there are exceptional circumstances for deviations from the standard method.						
1241491	LPIO-3959	yes	Evidence provided by experts at Manchester and Liverpool Universities, and Prof David Gregg and Graham Stevens, has been provided to the Council. This evidence produces a revised figure that represents the real need that exists in the Borough.						
1245502	LPIO-3987	yes	There is NO evidence to suggest that Wirral needs 12000 homes. Between 1997 & 2017 population growth was just 100.						
1238379	LPIO-399	yes	There are clearly exceptional circumstances for deviation from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 new homes. Statistics have shown that over the past few decades Wirral's population is aging and declining. The Council's own statistical data has already made it clear that there is very low growth on Wirral for either economic or population growth and points to an actual need a fraction of the 12,000 figure. In addition, independent analysis of housing targets by a local professor has also shown that using actual recent local population trends has proved that the Government's figures are far too high. Indeed, between 1997 and 2017 population growth was just 100. The 12,000 figure suggests an additional 20 - 30,000 people which is nonsense! Also, the very fact that Wirral is a peninsula is also a special circumstance as it physically cannot grow like other sites due to its many physical constraints. This also prevents any opportunity to "land swap" on three sides as they are water. The ex leader himself in his letter to Wirral residents of August 2018 states there are special circumstances!						
1245513	LPIO-4028	yes	Incapacity of the Wirral with its island similarities to naturally sprawl. The impact of an assesment not adequately taking this in to account directly contradicts the Councils mandated requirement to protect Green belt land at all costs. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified - there is absolutely no evidence to suggest that Green Belt boundaries need to be altered to deliver the housing needs of the Wirral nor is this an exceptional circumstance by any definition. The impact of even proposing a single large urban extension is comical in its total disregard for government policy to protect the land and prevent urban sprawl. The housing need assesment itself is so flawed that experts suggest the need to be a fraction of that currently quoted. Let alone including a 20% buffer penalty which has absolutely no evidencial backing to justify its inclusion.						
1240939	LPIO-4094	no							
1245638	LPIO-4191	yes	There are exceptional circumstances for deviations from the standard method. There is no evidence to suggest that Wirral needs 12,000 homes or anywhere near that figure. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either population or economic activity. Indeed, between 1997 and 2017 population growth was approximately 100 people.						

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1241868	LPIO-4203	yes	The figure of 12,000 homes is not a mandatory target and local authorities can adjust figure to suit local housing need. Wirral has a low population growth. Between 1997 and 2017 population growth was just 100. Wirral Council's Compendium of Statistics 2019 states that there should be 327 homes per year, not 803.						
1245641	LPIO-4211	yes	See response to 2.1						
1237724	LPIO-4250	yes	Yes there are exceptional local circumstances to deviate from the standard method. There is no evidence that Wirral needs anything like 12,000 homes. Wirral growth both in population and economic terms has been very low, between 1997 and 2017 population growth was just 100. Given the effect of corona virus there is no reason to accept the unrealistic growth plans which Wirral have posited. Evidence provided to the council by Universities of Liverpool and Manchester and Prof David Gregg and Graham Stevens show that the housing need is not as great as calculated by the standard method. As such the experts' calculation would meet national guidelines on providing sufficient housing numbers. The east of Wirral is in dire need of regeneration. By honouring the greenbelt this will help ensure building on the brownfield sites and help the regeneration. If the greenbelt is thrown open then the much needed regeneration will not take place and the brownfield sites will continue to blight the area. The east of Wirral has long been a dormitory area for workers in Liverpool. If the Council's ambitions for Wirral economic turnaround are not completely successful then there is the opportunity for employment in Liverpool which is at the moment thriving. Transport links from this part of Wirral to Liverpool are good and would be easy to improve. Transport from West Wirral to Liverpool is not easy and would be difficult to improve in any substantial way.						
1244215	LPIO-4500	yes	I am unclear as to how the Council will balance high projected housing build in East Wirral, with a fall-back to building in West Wirral if the targets for Birkenhead/Wirral Waters are not achievable. I think there should be a two-tier response. Wirral East targets for achieved housing should be set as exceptional need. If Wirral East fails to meet those targets, Wirral's overall target should be reduced, rather than transferring the full 'need' to the rest of the Wirral to try to meet through infill, and/or green belt appropriation as far as possible						
1242528	LPIO-459	yes	we dont need this many houses. we should not be forced to build on any green site we should only build social housing						
1245607	LPIO-4612	yes	Wirral's own population figures (taken from their compendium of statistics) have shown that over the last 25 years the population has remained very similar with little concrete evidence of overall long term growth. In fact the total population has only varied by about 3% over this period. Set against the background of national population growth it appears that Wirral is different due its unique demographic issues, and needs to evaluate its future needs using different methods.						
1241495	LPIO-4658	yes	The Standard Method was developed primarily for south-east England and does not take into account the fact that the Wirral is a peninsula surrounded by water on three sides. Wirral does not have the capacity for the proposed number of houses, and does not need them. According to the latest figures (2018) from the Office of National Statistics, there is no need for the numbers of houses being proposed. The Queens Speech (December 2019) also reduced the national housing target by 33%. Experts from both Liverpool and Manchester Universities calculate that only 2,500 to 6,000 new houses are required. I understand the council's own data does not support the number of proposed houses. There has been no population growth in recent years and there is no indication that this is about to change.						
1237696	LPIO-4665	no							
1241133	LPIO-47	yes	Again there is a lot of unpopulated building in the borough - redevelop that ...						
1245768	LPIO-4742	yes	The high figure used by WBC from the standard method is flawed and WBC should have challenged it and used official local data and a recognised method to come up with a more realistic figure for our area. The figure of 12,000 homes equates to 20,000 extra people, which is absurd, when there has been nil or very small population growth in previous years. Please see reply to my q.2.1a also as the Wirral Waters scheme would build houses where people would be nearer to transport links to Liverpool and beyond.						
1237873	LPIO-4807	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245782	LPIO-4840	yes	Various studies and reports show that Wirral does not need this number of houses. The population growth over the last 21 years has only been 100 and large companies such as Savills consider the Wirral as an area of low housing need where houses are most affordable. Wirral is also a peninsular so we live in a confined area with water on three sides. This in itself is a special circumstance due to our geographical position.						
1245794	LPIO-4885	yes	Urban regeneration should be a top priority in meeting housing need. This means a "brownfield first" approach to new development. Releasing Green Belt unnecessarily weakens this focus on urban regeneration. Wirral's actual housing need is 3,000 based on WBC's own statistics, supported by experts from Liverpool and Manchester Universities (employed by WBC). The quoted need of 12,000 is simply a mechanically-produced formula figure, and should be discounted. Wirral's population stats and trends cannot justify a 12,000 figure. I understand Senior WBC Members and Officers have no confidence in the 12,000 figure.						
1245713	LPIO-4929	yes	There is no evidence to suggest that Wirral requires 12,000 new homes. WBC have made it clear that there is very low growth on Wirral for Economic or Population growth. Population growth has shown to be only 100 between 1997 and 2017						

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1243171	LPIO-4936	yes	<ol style="list-style-type: none"> The population of Wirral is stable and even trending downwards slightly. No factors have been stated which would result in some 20-30000 new residents to occupy the new housing. Within the current population the fastest growing sector is retired people. Increased density of housing within existing built-up areas is already responding to this trend. The Council commissioned two studies by two universities to assess Wirral's future housing needs. Both came up with much reduced figures of between 3000 and 6000. In the new Government's Queen's Speech in January 2020, the national housing target was reduced by about 30%. This needs factoring into the WBC target. 						
1241327	LPIO-4946	yes	It is exceptional that the council are part of only 3 of 343 local constituencies to have been threatened with government intervention over the failure to produce a local plan in the given timeframe. There is significant and mounting evidence that the standard methodology is grossly over estimating housing need in this area.						
1239029	LPIO-496		Yes. The Wirral has a zero growth in population. It has little industry to attract any new residents. Therefore any small increase in housing need can be accommodated on existing brownfield and regeneration sites.						
1245867	LPIO-5008	yes	Local need has been shown to be significantly lower than the Local Housing Need calculation. This should allow the Council to conclude that exceptional circumstances justify an alternative approach. The Council should carefully read the data supplied by the universities and other well informed and able bodies and review its proposals as appropriate						
1245816	LPIO-5011	yes	Any proposal to release Green Belt land requires consideration of an approach based on 'exceptional circumstances'. I have compared the Council's plans for new properties required with figures resulting from expert analysis by independent bodies, and it is clear that number in the plans are far in excess of demand. I believe the Council itself must recognise this to be true and should therefore argue rigorously and with justification that exceptional circumstances apply.						
1237923	LPIO-5032	yes	There are exceptional circumstances as no actual need for 12000 houses has been proven - evidence produced from studies commissioned by WBC from Liverpool & Manchester University point to significantly lower figures as does compelling evidence already in the possession of WBC from WGSAs experts, also recent office for national statistics 2019 show projections for the population to be lower than those of 2014. The government's housing targets were cut by a third in the recent Queen's Speech - all these factors prove that the calculations used in the standard methodology calculations are completely outdated and should be re-worked.						
1242947	LPIO-530	yes	Yes I do, Wirral is a peninsula and it is surrounded by water and is a beautiful place to be. You cannot keep building within a small land area, we are not like other counties we have nowhere to go if you overbuild. This must be a consideration and every opportunity must be explored to use other parcels of land and not take virgin countryside.						
1242372	LPIO-5300	yes	Wirral is a peninsular surrounded by water on three sides which means restricted travel routes in and out of the borough which can already lead to congestion.						
1241733	LPIO-5383	yes	There is a need to deviate from the standard method of calculations because there is no evidence to suggest Wirral needs 12,000 new homes. Population growth on Wirral has been very low.						
1240383	LPIO-5403	yes	<ol style="list-style-type: none"> Some neighbourhoods on Wirral are both currently and historically within the top 10% nationally deprived areas. Alarming, the index of multiple deprivation (IMD) indicates that Wirral is an upward trajectory in terms of deprivation between 2015 and 2019. This Local Plan gives all the residents of Wirral the opportunity to at last target regeneration in the East and North of the borough and support this further by developing employment and housing land with Green infrastructure on Brownfield land to the East of the M53 corridor. This is the duty of a responsible Council. An exceptional circumstance exists here. A relaxation of the Green Belt boundary fails to unlock the full potential of regeneration. Physical and Environmental Constraints. The geography of this peninsular defines the Wirral and this provided an exceptional circumstance. The Dee and Mersey estuaries have International marine and Wetland designations with additional SSSI designated sites dispersed along the Wirral coastline. Any significant development anywhere on Wirral should have particular regard to these designations. The central swathe of land on the Wirral is primarily enclosed within a tight Green Belt boundary which serves five purposes defined by the NPPF and was created to control development and protect Green space. In Barnston Green Belt serves all five purposes, allows sustainable Agriculture to continue, protects habitats and wildlife including European protected species, protects landscape and enhances the setting and characteristics of the Barnston Conservation Area, WBC policy protects all these attributes. 						
1246030	LPIO-5468	yes	Evidence provided by experts at Manchester and Liverpool Universities, and Prof David Gregg and Graham Stevens, has been provided to the Council. This evidence produces a revised figure that represents the real need that exists in the Borough.						
1246035	LPIO-5476	yes	Evidence provided by experts at Manchester and Liverpool Universities, and Prof David Gregg and Graham Stevens, has been provided to the Council. This evidence produces a revised figure that represents the real need that exists in the Borough.						
1246041	LPIO-5529	yes	That University and WGSAs experts all calculate "housing need" at a fraction of the 12,000 figure is in itself a sufficient exceptional circumstance for challenge. I consider a figure between 2,500-5000 a better estimate.						

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1245984	LPIO-5665		There is no evidence the Borough needs 12,000 new homes. In addition we do not see any evidence of the Council exploring alternative ways of providing housing such as subdivision of large Victorian properties, repurposing retail and industrial properties for residential purposes, multigenerational housing models and co-housing.						
1246242	LPIO-5690	yes	There certainly are exceptional circumstances for deviating from the standard method. Wirral Borough Council have already stated there is very low economic & population growth. In the twenty year period 1997. - 2017 population grew by 100.						
1242751	LPIO-576	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100. On Wirral MBC's website it states "Wirral is legally obliged to make enough land available to allow for 12,045 houses to be built over 15 years – 803 every year." This is not true. The Secretary of State has said that this is a suggested figure. Councils can contest to build more or less. There is no "obligation" if alternatives are considered and approved. To use the word "obliged" is a blatant lie.						
1246284	LPIO-5807	yes	Birth rates in wirral should be taken into account.						
1245767	LPIO-5810	yes	By basing policy on a hugely overstated calculation of Wirral's housing need, and a wrongly perceived need to open up areas of Green Belt for development, the Council risks undermining the priority of regenerating existing urban areas where development of brownfield sites can best help address urban deprivation and poverty. I understand that Wirral's true housing need has been assessed to be in the order of 3,000 by experts appointed by the Council from both Liverpool and Manchester Universities, as well as others. Looking backwards, Wirral's population over recent years has been static if not declining.						
1246303	LPIO-5858	yes	Yes, there are exceptional circumstances for deviations from the standard method because I do not consider that there is evidence to suggest that Wirral needs even close to 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, I understand that between 1997 and 2017 population growth was just 100. Wirral as a peninsular does not have a robust infrastructure to link to key national employment growth areas that would sustain this level of increased housing. Indeed in my experience many of our young people look to move away from the area to progress their careers. I believe that they are not moving from the area simply due to lack of housing.						
1246310	LPIO-5890	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100 and in addition there are a large number of unoccupied home!!!						
1246306	LPIO-6000	yes	Any local plan that identifies a risk of green belt development should necessarily be considered an exceptional local circumstance.						
1246342	LPIO-6002		If the national target has been reduced by 33%- why not Wirral also? There has been nil population growth for many years, aspirational growth has been far too high. Land classified for "other uses" has lain unused for years.						
1246348	LPIO-6028	yes	Exceptional circumstances are Wirral is a narrow peninsula - 7 miles wide. We are talking about 60 square miles. There are only 3 roads to the south of out Wirral (already often congested) and 2 roads via tunnels to Liverpool. There is a higher than average older population. The ONS figures show there has been an increase in people aged 74 and over but a decline in the rest of the age groups. There is little increase in population numbers shown by the council's compendium of statistics. There is less industry than there used to be - Cadbury, Manganese Bronze gone and Cammell Laird scaling back. There may be some need for social housing but this council are more interested in building high band properties. Farmland required for growing food more important than ever after the coronavirus. Something like this virus may occur again and people are now using the greenbelt for recreation and fresh air as never before. Viruses such as this spread quickly in cities and cramped places not nearly so much in rural areas. Green belt, open spaces, farmland, school playing fields, trees etc, essential in respect of meeting council's own climate change objectives. Likes to be known as the leisure peninsula which is how it gets much of its income. This will not be the case if building takes place on the green belt.						
1246352	LPIO-6041		The population of the Wirral has increased by 100-120 since 2000, what makes the council think we need 12,000 more houses (i.e. 20,000 & more residents) by 2015. What does the "man-in-the-street" know about the 'standard method' set out in national Guidance? I bet over 75% won't know anything. (paragraph 1 Government figure for housing targets are NOT MANDATORY only a guideline.						
1246339	LPIO-6060	yes	Wirral's population only grew by 100 people in the twenty year period 1997 - 2017 and nothing suggests that this growth curve is likely to change. Housing figures should reflect this.						
1240964	LPIO-6069	yes	The housing forecast is too long term, but I appreciate that it needs to be long-term to satisfy government needs. A better method would be a best guess yearly increase that is strategised for who actually needs housing in the wirral and what value and size housing is required by these buyers/renters? The plan should not be in the slightest geared towards developers needs, there is a massive development proposed that fills in all the greenbelt between Heswall, Barnston, Irby and Pensby. Who exactly are the council expecting to live there? What are the forecast property prices? Are there going to be that many new jobs to support the borrowing by households moving to the site? Money that the developers require to please their shareholders.						

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1238310	LPIO-6101	yes	Yes there are exceptional circumstances. WBC commissioned reports by Manchester and Liverpool University provide the evidence that Wirral does not need 12000 homes. A further report from WGSa supports this. The actual requirement is stated at less than half of this figure. The Wirral specific figure is so far apart from the standard figure it is in itself an exceptional circumstance. WBC has already confirmed that there is very low population growth. The Wirral compendium of statistics table 1h shows that between 1997 and 2017 population growth on Wirral was just 100 people. Table 1i projects a 1.6% growth by 2039 that's 5300 (4700 in 2034) people for 12000 homes. This is an exceptional circumstance. WBC has proved to the people of Wirral that there is no need for 12000 additional homes. Pursuing the unrealistic 12000 figure leaves the council with problems. WBC will not be able to build 800 homes per year for 15 years. Wirral is currently averaging 214 new dwellings per year. (Compendium of statistics) WBC must challenge the standard figure on behalf of the Wirral. There is absolutely no valid reason not to. Brexit is a national exceptional circumstance that will undoubtedly have an effect on local housing need figures. Brexit uncertainty regarding migration and economic growth adds support to the argument for WBC to use area specific figures at this time of uncertainty The Climate change emergency is a global exceptional circumstance but it can only be addressed if each local community acts. Studies indicate the construction of a new house emits 68 tonnes of CO2. 6000 less unnecessary homes would save 408000 tonnes of CO2 emission That is an exceptional opportunity.						
1246161	LPIO-6213	no	We do not believe there are any exceptional circumstances to warrant deviation from this method.						
1246372	LPIO-6230	yes	The economy of the North West is no where near a successful as in the South and migration for work is less.						
1246389	LPIO-6296	yes	There are exceptional circumstances. As a peninsula Wirral is surrounded on three sides by water. leaving it no room to draw on land to the west, north or east for housing or access to open space in an adjacent borough. Few, if any, other authorities share this characteristic, making Wirral exceptional.						
1244729	LPIO-6307	yes	There should always be local circumstances to adjust a National Plan. Local birth rate, number of current vacant houses etc.						
1246397	LPIO-6364	yes	Some areas in the Wirral are clearly old & out of date, and could therefore, in part, be added to the "Open spaces" description. A case in point is that very recently, it is becoming clear that the construction & development of vehicles may be reduced in the U.K., due in part to the costs of electric vehicles.						
1246402	LPIO-6372		I believe there are exceptional circumstances for deviations from the standard method because the figures do not stack up. Wirral does not need 12,000 homes because as Wirral Borough Council have already made clear there is very low population or economic growth on Wirral for example the population figures show that, between 1997 and 2017 population growth was only 100.						
1242183	LPIO-6376		Certainly - there is no evidence that Wirral need anywhere near 12,000 houses. The forecast from the councils is predicting a fall in population over the next 20 years of 2.9%. During the last 20 years the population increased by 100 from 1997 - 2017.						
1246410	LPIO-6403	no							
1246415	LPIO-6425		Maybe these figures were set for a boom growth. Which I think has slowed on the Wirral.						
1246419	LPIO-6483	no	Large numbers of people live in Wirral but do not work in Wirral. More homes is likely to increase this.						
1246420	LPIO-6508	yes	There appears to be no evidence to suggest Wirral needs 12,000 new homes. WBC has already shown there is very low growth on Wirral - population or economic.						
1241723	LPIO-6529	yes	As mentioned, local demographic trends as noted in Wirral Compendium of Statistics						
1246431	LPIO-6602	yes	I refer to the submission sent on behalf of Wirral Green Space Alliance, and the detailed work carried out on housing numbers. Also the numbers calculated by Liverpool and Manchester universities for the council.						
1246435	LPIO-6622	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral borough council have already made it clear that the Wirral is a low growth area for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1245286	LPIO-6639	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral borough council have already made it clear that the Wirral is a low growth area for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246438	LPIO-6657	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral borough council have already made it clear that the Wirral is a low growth area for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1241910	LPIO-6674	yes	Yes, there are exceptional circumstances because there is no EVIDENCE to suggest that Wirral needs anywhere near 12,000 homes. Wirral MBC have already made it clear that there is low growth on Wirral for either economic or population growth. Between 1997 and 2017 population growth was just 100.						
1246441	LPIO-6712	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral borough council have already made it clear that the Wirral is a low growth area for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1246445	LPIO-6732	yes	Being a peninsula, Wirral has limited expansion potential a large part of its appeal as a place to live is the Green Belt and separation of communities, especially west of M53.						
1246447	LPIO-6761	yes	Yes, There is no evidence to suggest we need 12,000 new homes. WBC have themselves stated that there is very LOW economic and population growth.						
1246452	LPIO-6780		There is no evidence which suggests the Wirral needs 12,000 homes. The Council's own figures show there is very low economic and population growth.						
1246455	LPIO-6797	no							
1246401	LPIO-6825	yes	Yes, there are exceptional circumstances to deviate from the standard method. Wirral Borough Council has not put forward compelling figures to suggest a need for 12,000 homes. Growth levels on Wirral are historically low coupled with an ageing population. The lowered National Housing Figures should be taken into account. Certainly there are no exceptional circumstances to be putting forward green belt sites when it is clear a proper appraisal of available brown field sites and re-development opportunities has not been properly considered. The Council is not engaging with local groups and experts to put forward a realistic plan based on actual trends and growth.						
1246482	LPIO-7001	yes	There is no employment for the additional people who would live in these homes. The population growth 1997 to 2017 was only 100 additional people.						
1246456	LPIO-7064	yes	University and WGSa experts suggest a figure between 2,500 and 5,000 houses (dwellings) required.						
1246486	LPIO-7082	yes	There is no evidence to suggest that Wirral needs 12,000 homes, nowhere near in fact. WBC have already made it clear, that there is only low growth between 1997 and 2017 in fact it was just 100, yes one hundred. All experts agree. University and WGSa all calculate housing needed is for lower than the 12,000 suggested.						
1246488	LPIO-7085	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246495	LPIO-7140	no							
1246501	LPIO-7158	yes	Yes there are exceptional circumstances. There is no evidence to suggest Wirral needs 12,000 homes, population growth between 1997 & 2017 was just 100.						
1246504	LPIO-7178	yes	Yes, there is a low growth in the population on the Wirral, partly due to the economic decline of the area over the last two decades. The Wirral being a unique peninsula in England, should be regarded as an exceptional local circumstance in itself.						
1244604	LPIO-7207	yes	Yes, the Wirral is a peninsula - therefore surrounded on 3 sides by water. Looking ahead (say 15 years) the main thrust of industry should be tourism based. Therefore open, green spaces are needed to attract visitors. Housing estates built on Greenbelt and the like will detract and deter visitors.						
1246515	LPIO-7241		Peninsula situation - risk of intense urbanisation. Need green "buffer areas" i.e. green-belt.						
1246518	LPIO-7263		Here on the Wirral we are a special place. It is a hidden gem but is cut off by the fact it is a peninsula - therefore....you cannot "space out" developments. Great care has to be taken to ensure we don't have urban sprawl i.e. need to preserve GREEN BELT at all costs.						
1238102	LPIO-7292	yes	Wirral is different in that :- a) It has a declining population. b) Industry is declining. c) The population is aging.						
1246524	LPIO-7318		Wirral is not just any town in the north of England. No other Borough can offer the diverse mix of living, working and relaxing in countryside or on a beautiful coastline. It needs to be preserved!						
1246545	LPIO-7396	yes	The population of Wirral is not growing sufficiently to need 12,000 new homes, it has been stagnant for some years, and only 8,000 would be needed.						
1237978	LPIO-7416	yes	The population trend in Wirral is for an ageing population. The requirement is for more apartments as shown by the current planning applications. This increases housing density and reduces the need for new build.						
1246549	LPIO-7433	yes	We will need every bit of land to grow our own food. You cannot grow food on bricks.						
1246550	LPIO-7449	yes	There is no evidence that Wirral needs 12,000 homes. The population growth of the borough is very low. The council has an obligation to ensure the quality of life for existing residents such as maintaining and sustaining the Green belt.						

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1240932	LPIO-7577	yes	Yes, Our Client believes there are exceptional circumstances to deviate from the standard method for calculating LHN in accordance with the provisions of paragraph 60 of the Framework. The Government is clear that the figure derived from the standard method is intended to be a minimum figure, population changes are only one aspect of the driver for housing demand and the standard method does not attempt to predict the impact of government and local policies, changing economic circumstances or other factors. A detailed consideration of the exceptional circumstances which can currently be found in Wirral are outlined at paragraphs 4.1 to 4.150 of the accompanying Stage 1 Technical Assessment report prepared by Consultants, whose analysis reveals three main factors. Firstly, projections show that Wirral faces some stark demographic issues over the years ahead and the Council needs to encourage higher levels of net inward migration amongst economically active age groups if it is to support a healthy economy in the years to come. Secondly, housing in Wirral is comparatively unaffordable and should this continue, fewer Wirral residents will be able to get on the housing ladder in future. The Council's approach therefore must align with the Government's objective of significantly boosting the supply of homes in sustainable and viable locations and the Local Plan needs to provide more than the minimum required of the Borough. Thirdly, Our Client also has clear concerns that the Council's ambitious targets for economic growth and that the much-increased provision of employment land outlined in the draft Local Plan will not be adequately supported by the requisite level of appropriate family and affordable housing across the Borough should the Council adopt a standard 'business as usual' minimum housing requirement.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701			
1246581	LPIO-7579	yes	1. Regeneration needs should be a priority given the urban deprivation and poverty prevailing in parts of the Wirral. Brownfield first should be the priority and releasing Green Belt would just divert development away from brownfield sites 2. There is a huge difference between the 12,000 formula figure and the actual need which is nearer 3,000 3. Wirral's population growth has been flat for years and does not support the 12,000 figure 4. A more tailored method to calculate housing need rather than the insensitive Standard Method is needed. Otherwise the release of Greenbelt will not drive development to Brownfield sites						
1246592	LPIO-7678	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246594	LPIO-7715	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1240903	LPIO-7736	yes	The housing need calculation used in this consultation is clearly unrealistically high. A Housing Need figure of 12,000 new homes would mean an additional 20,000 residents when the evidence clearly shows that Wirral's population has remained stable for years and there is no indication that this is about to change. Surely, this is utter nonsense, especially when the Council's own statistical data points to an actual need at a fraction of this figure! Consequently, demand will be much lower than the stated need would suggest. Such a high figure is simply not justified by historic or current trends. It is incomprehensible that the Council seem unprepared to challenge a formulaic starting point, despite I understand, having been urged to do so by Secretaries of State, many local politicians, the majority of community and interest groups, and most importantly, huge numbers of Wirral's residents. Not doing leaves ALL our Green Belt at unnecessary risk for NO good reason.						
1246591	LPIO-7871	yes	Yes - the pattern of population growth/decline in the Wirral is not typically when compared to other parts of the country. A bespoke Wirral methodology is required to reflect the nature of a peninsula and the economic challenges it faces.						
1246596	LPIO-7919	yes	I do think there are exceptional circumstances. I think that there is a huge difference between the 12000 formula figure and Wirral's actual need which is nearer 3000 and this is supported by the Council's own statistics and other official public records. Wirral population has flattened for years and does not support the 12000 figure.						
1246523	LPIO-7964	yes	The very nature of the mix in Wirral, urban, industrial, rural and coast is should have greater weight than this plan offers. Population growth in recent decades does not support the standard approach.						
1243448	LPIO-798	yes	There is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1240925	LPIO-8062	yes	The core principle of green-belt policy is to prevent urban sprawl. Essential characteristics of green-belt are openness and permanence. Established green-belt boundaries should only be altered in exceptional circumstances; with evidence and justification. There is no evidence that green-belt boundaries must be amended to deliver local housing needs and nor is there any justification for this being an exceptional situation.						
1246598 (Hoylelake Vision)	LPIO-8075	yes	Coastal towns have a reduced catchment and land availability, often exacerbated by further spatial constraints, such as railways and greenbelt land. As a result, options to develop on the periphery of such towns are less than would be the case for an inland town. There is therefore a risk that developer pressure will lead to increased density; eg more infill development or replacing larger residential properties with smaller units or flats. The standard methodology needs to be applied but with a weighted preference for development away from the coast.						

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1246605	LPIO-8103	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246612	LPIO-8228	yes	There has been very little population growth in Wirral over the last 2 decades and there is nothing to suggest this will change. There is no evidence that the Wirral needs anything like 12000 new homes						
1237882	LPIO-8233	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. For example, between 1997 and 2017 the population growth was just 100. Also, information has also been provided that indicates that significantly lower than the Local Housing Need calculation is required. I urge the Council to seriously consider this information and review its proposals as appropriate.						
1245044	LPIO-8273	yes	Yes, you already have the evidence from the Wirral Green Space Alliance expert reports, your own consultant reports, the University of Liverpool / Manchester studies and the Wirral Compendium of Statistics. Wirral is a peninsula, surrounded on 3 sides by water. The recent population trends do not support the proposed figure of 12000 houses. Wirral has one of the largest potential brown field development sites in the country at Wirral Waters. The social deprivation in Wirral is some of the worst in the country and this alone should be an exceptional circumstance and should mean that all house building should be targeted at sustainable Brownfield urban regeneration and social / affordable housing. The significant number of empty homes should also be an exceptional circumstance. The impending climate change disaster, Brexit and now the Coronavirus outbreak should also be an exceptional circumstance to justify not building on the Green Belt. The Coronavirus has proved how important green spaces are for people's health and wellbeing and for food production etc.						
1244670	LPIO-8362		Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1237748	LPIO-8487	yes	Calculations by WGSa experts, Manchester University and Liverpool University have all clearly shown that the estimated housing is around half that given by the use of the Standard Method. Wirral's population is approx static, the economy is also not growing and geographically Wirral is constrained on three sides by water severely limiting development options.						
1246624	LPIO-8492	yes	Yes, because there is no evidence to suggest that Wirral needs 12,000 homes. Wirral Borough Council have already made it clear that there is very low economic and population growth within the borough						
1240872	LPIO-8497	yes	We are a Peninsula unable to grow like other towns and cities. How can the standard methodology apply when there are physical constraints that have not been accounted for? Wirral has a declining population due to lack of jobs and migration of young people. Before homes are built, jobs are needed. If this isn't addressed first our roads and burden to services will become even worse than they are today. The issue of land banking must be addressed first before releasing even more land. This is immoral and to the detriment of every Wirral resident. It is already known that Wirral Waters will provide over 15000 homes in a planned way that matches demand and justifies the need, why should our local plan be any different? Birkenhead is one of the most deprived areas in the UK. Why are we not focussing our effort here rather than building more 4-5-bedroom luxury homes in the greenbelt? WBC have also just declared a climate emergency, there are exceptional circumstances when WBC are having to consider removing sites like SP043 to meet the 12000 figure. This site holds a nature reserve, ancient woodland, the highest-grade agricultural land on the Wirral, is acknowledged for its biodiversity and provides a corridor to the open countryside. Just by assessing SP043 you are clearly demonstrating the exceptional circumstances Wirral faces, having to contemplate assessing SP043 should have raised serious concerns and raised the issue that Exceptional circumstances exist.						
1246544	LPIO-8526	yes	As noted above, the Wirral Compendium of Statistics illustrates local demographic trends which refute the necessity for such a high number of houses						
1237832	LPIO-8583	yes	Current and projected population figures. They produce a much smaller trend						
1243903	LPIO-8589		We need smaller properties to be built. A curb on larger properties taking up space which could accommodate smaller affordable homes is better for our community. This provides a better mix of housing which benefits all society. Parts of Wirral are becoming totally absorbed by large houses on estates.						

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1246631	LPIO-8636	yes	The key point here is that the population figures of Wirral have remained fairly static since we moved here 34 years ago. As a secondary school teacher in the borough for just under 30 years, I am well aware of the number of young people who move away to study, after finishing school, and who then find employment and homes elsewhere. The figure of 12,000 new homes is based on greatly exaggerated claims about the economic potential of the area. Indeed, the Council's own data indicates that the figure is grossly inflated and that a figure of approximately 3,000 new homes would be a much more realistic target. Wirral has marketed itself as the 'leisure peninsula', which surely means preserving and protecting its green spaces. The borough is already to some extent a dormitory for people who work in the wider Liverpool City Region or even further afield. This does not bring particular economic benefit to the borough and the situation would be worsened by building very large numbers of new homes. The current Covid-19 crisis is also providing a powerful demonstration of the value of having green spaces right on the doorstep, where people can walk and take exercise, without the need to travel in a car. In addition, it is demonstrating the importance of having a plentiful supply of locally grown and produced food, which will not be possible if swathes of local farmland are built on.						
1237807	LPIO-8641	yes	Wirral is constrained on three side by water. It cannot afford to give up any of its green belt. People need open spaces. Where is the soul in building more and more houses. Where will the people who live in them come fro? How will they enjoy their recreation? What effective will the current Coronavirus epidemic have on all of this anyway?						
1246638	LPIO-8664	yes	Various community groups and experts appear to have called into question the adoption of this figure. WBC should re-examine their decision for adopting it.						
1246622	LPIO-8701	yes	Clear geographical features at risk of mutilation with excessive urbanisation. Its rural nature and contribution to national food supply lack of evidence of exponential increase in population or population mix. it is of national interest to keep the wirral within its current housing framework as exemplified by the Covid-19 pandemic						
1246651	LPIO-8772	yes	Local demographic trends as set out in the Wirral Compendium of Statistics						
1243593	LPIO-8824	yes	1. existing population growth in Wirral. 2. University and WGSA experts all calculate the housing need at a fraction of the 12k figure.						
1238116	LPIO-884		Yes. See above. Government has to acknowledge the fact that Wirral's population is declining not growing.						
1241852	LPIO-898	yes	As we are mainly a small leisure and greenbelt peninsular, we on the Wirral do not have enough businesses or job opportunities for 12000 properties (probably 25000 employable residents). Its an impossibility !!!!!						
1246666	LPIO-8983	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral borough council have already made it clear that the Wirral is a low growth area for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246670	LPIO-9053	no							
1246671	LPIO-9093	yes	800 Homes per year seem an awful lot considering businesses are closing down & the Wirral does not have many employment opportunities. Don't see how people will be able to afford to buy or rent.						
1246672	LPIO-9140	yes	As the Wirral does not have many employment opportunities people will not be able to buy/rent the additional 800 homes per year.						
1246678	LPIO-9261	yes	The method used needs to be pertinent to the needs of Wirral, not the standard method.						
1246693	LPIO-9509	yes	Yes absolutely and to not challenge the figure would be a massive failure on behalf of the council. There are exceptional circumstances for deviations from the standard calculation and this has been well documented by the Council itself in the Compendium of Statistics 2019 it clearly states that there should be 327 homes per year, not 803. Wirral Borough Council have already acknowledged there is very low growth on Wirral for either economic or population growth with a population growth of 100 between 1997 and 2017 - 20 years!!! There is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes.						
1246699	LPIO-9518		Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246705	LPIO-9539	yes	Wirral is a peninsula with a small access isthmus and therefore its ability to expand its area is extremely limited. Thus to increase its housing stock significantly it would become necessary to consume green belt land, thus impairing the residents' amenities for recreation, etc.						
1246712	LPIO-9553	yes	Please see our attached statement.						
1246691	LPIO-9554	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						

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1242554 Port Sunlight Village Trust	LPIO-9612	yes							
1238424	LPIO-9685	yes	As many Wirral residents work in Liverpool, the housing demand is inter-related with the economy of Liverpool, jobs created etc. It should not therefore be taken in isolation.						
1246720	LPIO-9689	yes	The overall housing requirement of 12,000 dwellings over the plan period (2020-2035) is too low. The circumstances in Wirral provide clear justification for planning for a higher housing need figure than the standard method. These are as follows: The impacts of previous housing under-delivery are quantifiable and significant. The period of extreme under-delivery coincides with the following stark statistics which show that there are 5,201 households in critical housing need: overcrowding - a total of 3,621 households living in overcrowded conditions (2.5% of all households); and, homelessness - a total of 1,580 households who are either homeless or living in temporary accommodation. The identified need for affordable housing will not be met. The Draft SHMA (January 2020) concludes that there are 12,705 existing household in affordable need. That figure nor the net need of 705 per annum are conspicuous by their absence in the Issues and Options Plan. Even the 5,201 households in critical housing need equate to 43% of the total requirement. Therefore the Wirral faces an unprecedented affordability crisis that requires urgent and radical policy responses through the Local Plan. These figures show that the mathematical formula (standard method) is not appropriate to derive the housing requirement and those real people in housing need now will be failed by the Local Plan. Whilst the standard method is the starting point, under such circumstances the Council should strongly consider a significant increase in the housing requirement in accordance with the PPG.						
1246719	LPIO-9741	yes	Wirral is a peninsula, steeped in history within a natural setting. It would be unable to cope with such an increase in housing, it can't expand to accommodate the additional traffic, schooling and hospitals which would be needed to support such an increase in population. The quality of life of it's present residents would be severely compromised if such building, particularly on Greenbelt land were to proceed.						
1238147	LPIO-9751	yes	The need for urban regeneration in Birkenhead fully justifies a deviation from standard methodology, especially as the standard methodology uses misleading population growth projections.						
1241337	LPIO-9764	yes	Regeneration needs should be a priority given the urban deprivation and poverty in parts of the Wirral. This requires a strict 'brownfield first' approach to ensure development where new jobs and housing will help to solve problems of deprivation. Releasing green belt land unnecessarily would result in the need for this regeneration being undermined. The Council's stated approach recognises this need. Use of exaggerated housing need forecasts would result in the unnecessary release of green belt land that is vital for human wellbeing -we need to do all we can to slow down climate change by maintaining our green spaces, tree cover and wildlife habitats.						
1240711	LPIO-979	yes	Population growth on the Wirral between 1997 and 2017 was just 100. The Council have said that there is very low growth in either economic or population growth. Please be honest and objective in how you determine the housing target for the period 2020 to 2035. You have come up with a fictitious figure that cannot be factually supported.						
1246724	LPIO-9811	yes	Yes, there are exceptional circumstances for deviations from the standard method because there are absolutely no evidence the suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed between 1997 and 2017 population growth was just 100.						
1246724	LPIO-9842	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12,000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246732	LPIO-9898	yes	The Liverpool University assessment of household growth - available on the wirral.gov website shows a fall in the estimated number of households in 2035 when the 2016 figures are used compared to the 2014 figures - table appended. Household projection Wirral households, 2035 2012-based 155,557 2014-based 156,528 2016-based 150,080 Table 2: Trends in the projected number of Wirral households in 2035						
1244412	LPIO-992	yes	There is no evidence that 12000 new homes need to be provided on Wirral. The council has already admitted there is very low growth on Wirral in terms of both economic and population growth. From 1197 to 2017 total population only rose by 100 supporting this view.						

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1245994	LPIO-9924	yes	After some Google searching I did eventually find three studies commissioned by the Council with experts at the Universities of Liverpool and Manchester. Both organisations concluded that the Office of National Statistics (ONS) 2016 projections were both "robust and internationally accepted" and implied between 6,100 and 7,100 new homes would be required on Wirral between 202-2035, and recommended the Council should consider a baseline figure of 430 dwellings per annum on average. I do not accept the Council's arguments for dismissing these reports. The Standard Method does not have to be applied if exceptional local circumstances can be demonstrated. Public submissions and two academic institutions have all come up with estimates around half of that projected by the Standard Method. This surely demonstrates that exceptional circumstances must exist. If not, where is the evidence that it doesn't? Over egging the targets to make up for historic under-delivery is nonsense. Targets have to be realistic otherwise you are simply setting yourselves up for failure yet again. Realistic targets will lead to a realistic plan. There is no evidence that building more homes will bring the price down to combat declining affordability. Indeed, the Manchester study concludes that suppressed demand rather than an increase in ability to buy or occupy housing is more likely and may reduce the housing need to 250 dwellings per annum in 2020 -2035.						
1246747	LPIO-9937	yes	Yes - as referred to in my previous response, I'm concerned that we're a peninsular with limited transport/roads in and out of the area and nowhere to 'expand' to... Our green spaces/green belt are so valuable, and if they're built on we risk creating a peninsular which was largely urban/suburban, and residents would have to travel a long way to access the countryside.						
1241924	LPIO-999	yes	Population and local job opportunities						
1246458	LPIO-25677	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1246459	LPIO-25678	yes	Yes, there are exceptional circumstances for deviations from the standard method because there is absolutely no evidence to suggest that Wirral needs anywhere near 12, 000 homes. Wirral Borough Council have already made it clear that there is very low growth on Wirral for either economic or population growth. Indeed, between 1997 and 2017 population growth was just 100.						
1249271	LPIO-26113		The Council is required to consider whether it is appropriate to plan for a higher level of need than the standard model suggests. The implications of the emerging growth strategy within the Wirral or its role within the wider Liverpool City Region (LCR) have not been properly considered. The current proposed housing requirement will not sufficiently support the rebalancing of the economy and the implementation of the Devolution Deal and further growth is needed to support the wider economic aspirations of the LCR and to deliver the range of housing type and tenure required to secure future sustainability. Work undertaken aimed at 'Defining the Housing Market Area (HMA) and Functional Market Area' in support of the later Strategic Housing and Employment Market Assessment (SHELMA) concluded that the LCR is an HMA in its own right. The work undertaken by the authorities of the LCR in the preparation for a Liverpool City Region Spatial Development Strategy, underpins that conclusion. Neither Liverpool City Council nor the Combined Authority are clear on how the qualitative need for larger properties set out within Liverpool's evidence base will be provided for. Wirral, along with other boroughs within LCR, will have a combined role to play in delivering the types of housing which cannot be met within Liverpool, which will inevitably require the release of new greenfield sites to provide the larger and higher value aspirational housing required within the City Region. The delivery of housing has been the key weakness of the housing market in recent history and boosting of the housing supply is needed to overcome the huge backlog in the provision of affordable housing, through the delivery of additional market led affordable housing and to close the worsening affordability gap in Wirral, which is more acute than the majority of any of its neighbouring authorities, the North West region and the national average.						
1249116	LPIO-25953 1 of 2		The standard method set out in the Planning Practice Guidance is a minimum starting point only. In Wirral, exceptional circumstances exist for an uplift to be applied. It is entirely appropriate to plan for a higher housing need figure than the standard method indicates.	https://wirral-consult.objective.co.uk/file/5675693	https://wirral-consult.objective.co.uk/file/5675700	https://wirral-consult.objective.co.uk/file/5675694	https://wirral-consult.objective.co.uk/file/5675696		
1249116	LPIO-25953 2 of 2		The standard method set out in the Planning Practice Guidance is a minimum starting point only. In Wirral, exceptional circumstances exist for an uplift to be applied. It is entirely appropriate to plan for a higher housing need figure than the standard method indicates.	https://wirral-consult.objective.co.uk/file/5675698	https://wirral-consult.objective.co.uk/file/5675692	https://wirral-consult.objective.co.uk/file/5675697			

