

Person ID	ID	Question 4.11 - Based on the fact that some of the proposed Urban sites will take longer to develop, do you agree with a 'stepped housing trajectory approach' provided that our housing targets are met by the end of the plan?	Question 4.11a - Please give reasons for your answer:	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1238147	LPIO-10008	yes	The housing demand in the earlier part of the plan has been set higher due to a perception of under-delivery in the past. I believe a proper analysis of past delivery as conducted by the Wirral Green Space Alliance and the Heswall Society will show a higher delivery and reduce pressure early in the Plan period, thereby facilitating a stepped approach						
1241337	LPIO-10054	yes	This would seem to be very essential to give the Council more time to consolidate its regeneration strategy. I am reliably informed that figures for past completions of dwellings have failed to take account of a number of unregistered completions which would reduce the requirement for number of dwellings in the first 5 year phase of the plan.						
1245044	LPIO-10079	yes	Yes. Due to the scale of transformational change at Wirral Waters a stepped approach would be entirely reasonable and appropriate to the national and local policies for more effective use of land						
1246747	LPIO-10097	yes							
1246760	LPIO-10115	yes	This seems eminently sensible so long as the release of green belt is ruled out to begin with. The stepped approach will lead to a greater chance of success for the Wirral Waters concept and will also allow the Council to gauge the take-up of new houses and tailor the build programme to demand/population growth over the duration of the plan. It will give greater chance to obtain external funding and ensure the areas that are in greatest need of development are not left out.						
1241629	LPIO-10282	yes							
1246763	LPIO-10309	yes	We will support the principle of a stepped approach to facilitate delivery of the Site, under the assumption that in order to implement the necessary infrastructure and site preparation there will have to be a longer lead in period until maximum housing numbers can be achieved. The Wirral has failed the new Housing Delivery Test, highlighting the historic under-delivery of new housing against the assessed requirement for new homes in the Borough. As such, there is a need for significant change in the level of housing required, and this would justify a scaling up in delivery, possibly through allocations that encourage developers to gain planning consent and push through delivery. In November 2016 an investigation into lead-in times and build-out rates of large (500+) and small (50-499) strategic housing sites titled 'Start to Finish How Quickly do Large-Scale Housing Sites Deliver?' was published by Lichfield's. The research highlighted several important matters which have a bearing on the delivery rates of large site, including lead-in times; planning approval periods; and time taken for first housing completion after planning approval. In essence larger sites, especially those on Brownfield land, have longer lead-in times but yield greater annual delivery rates when work commences. As none of the sites listed in Appendix 4.2 are over 1,000 dwellings in size, a stepped trajectory would not have a significant impact on the ability of the Council to meet the annual target for housebuilding, especially in the earlier years of the plan period.						
1244412	LPIO-1032		a stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1241065	LPIO-10385	yes							
1246724	LPIO-10423	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246772	LPIO-10454	yes							
1246778	LPIO-10506	yes							
1248825	LPIO-10684		Urban Intensification Option 1B proposes stepped delivery, with lower numbers in the early years of the plan. No trajectory is provided for this option and no details of the sites which would be delivered later in the plan period. If this option (or another yet to be determined option that involves lower initial requirements) is progressed, it underlines the importance of prioritising and seeking to maximise delivery from sites which are better placed to deliver in the early years of the plan, such as Wirral Waters.	https://wirral-consult.objective.co.uk/file/5684264					
1246242	LPIO-10779		A stepped approach to land and land owners of Brownfield sites in the Birkenhead area has to be adopted. Green Belt should never be favoured by virtue that a developer may find it easier to develop.						
1243890	LPIO-1101	yes							
1247196	LPIO-11576		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247015	LPIO-11782		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1240731	LPIO-1192	yes							
1247214	LPIO-12403		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1244681	LPIO-1242	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option1b (allowing a lower build-number in the first phase, to be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) – provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						

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1247492	LPIO-12502		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1240843	LPIO-12666		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247578	LPIO-12864		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247510	LPIO-12988		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246335	LPIO-13120		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246853	LPIO-13380		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1241412	LPIO-135	yes	Brownfield sites should be the priority in any stepped approach and the regeneration of empty houses and conversions of shops to housing.						
1246852	LPIO-13502		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1243700	LPIO-1365	yes	A stepped approach to developments would be acceptable provided the Green Belt was excluded. A stepped approach would also test the need for 12,000 net new dwellings over the plan period.						
1247746	LPIO-13657		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1238192	LPIO-13795		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247012	LPIO-13850		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247014	LPIO-13904		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1242183	LPIO-13975		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247218	LPIO-14069		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1244900	LPIO-1415	yes							
1247219	LPIO-14174		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247220	LPIO-14274		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247222	LPIO-14404		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247226	LPIO-14491		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247245	LPIO-14582		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247829	LPIO-14634		A stepped approach seems to be more rational than trying to tackle all available sites from the beginning, ie make the sites with the fewest problems available for development first, have more time to work on more difficult sites. Brownfield sites may present problems that are difficult to track and solve, therefore dealing with them must not be delayed too much. Clearly some work is required initially to identify difficulties and then put sites into a rational order of increasing difficulty.						
1247829	LPIO-14653		A stepped approach seems to be more rational than trying to tackle all available sites from the beginning, ie make the sites with the fewest problems available for development first, have more time to work on more difficult sites. Brownfield sites may present problems that are difficult to track and solve, therefore dealing with them must not be delayed too much. Clearly some work is required initially to identify difficulties and then put sites into a rational order of increasing difficulty.						
1246827	LPIO-14710		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247016	LPIO-14840		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247018	LPIO-14906		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247246	LPIO-15329		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						

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1244901	LPIO-1539	yes							
1247248	LPIO-15442		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247251	LPIO-15547		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247252	LPIO-15640		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247274	LPIO-15738		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247275	LPIO-15851		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247936	LPIO-15992		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247287	LPIO-16205		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1244969	LPIO-1622	yes	Without doubt the preferred option. As I have stated before, Wirral has more than sufficient Urban, Brown Field and land to be recycled available to fulfill all requirements. A strategic delivery timetable should be presented to Government as an exceptional circumstance.						
1247344	LPIO-16292		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247349	LPIO-16380		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247353	LPIO-16468		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247354	LPIO-16556		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247935	LPIO-16654		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247434	LPIO-16660		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247436	LPIO-16769		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247437	LPIO-16902		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247439	LPIO-16903		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247441	LPIO-17067		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247960	LPIO-17188		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247962	LPIO-17275		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247966	LPIO-17380		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247971	LPIO-17485		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1241726	LPIO-17579		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247979	LPIO-17698		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247980	LPIO-17699		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245502	LPIO-17870		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247541	LPIO-17969		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247539	LPIO-18078		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247996	LPIO-18229		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1237857	LPIO-18232		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245060	LPIO-1838		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247021	LPIO-18391		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247022	LPIO-18445		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247023	LPIO-18500		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						

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1247024	LPIO-18555		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247025	LPIO-18625		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247038	LPIO-18626		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247039	LPIO-18747		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247040	LPIO-18748		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247041	LPIO-18843		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247042	LPIO-18909		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247060	LPIO-18990		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247061	LPIO-18991		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247063	LPIO-19093		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247064	LPIO-19139		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247068	LPIO-19194		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247071	LPIO-19251		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247072	LPIO-19306		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247078	LPIO-19363		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						

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1247080	LPIO-19432		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247081	LPIO-19433		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1245069	LPIO-1946	yes	A stepped approach will enable ongoing assessment of actual housing needs to be more accurately assessed and then adjusted as appropriate..						
1247082	LPIO-19631		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247083	LPIO-19686		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247084	LPIO-19741		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247085	LPIO-19804		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247088	LPIO-19870		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247089	LPIO-19931		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247090	LPIO-19987		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247091	LPIO-20041		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247092	LPIO-20099		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247093	LPIO-20159		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247094	LPIO-20219		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247095	LPIO-20275		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						

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1247096	LPIO-20330		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247099	LPIO-20387		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247101	LPIO-20441		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247108	LPIO-20575		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247102	LPIO-20576		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247106	LPIO-20615		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247105	LPIO-20616		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247109	LPIO-20711		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247110	LPIO-20777		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247111	LPIO-20778		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1237870	LPIO-2083	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone						
1245105	LPIO-2084	yes	I strongly agree that a slower considered process would be much more beneficial in the long term. An effective regeneration plan in Birkenhead could have immense benefits to a huge number of people. If greenbelt is built on it is irreversible.						
1247112	LPIO-20931		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247115	LPIO-21041		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247116	LPIO-21095		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1246851	LPIO-21162		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246918	LPIO-21300		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						

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1246924	LPIO-21301		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246928	LPIO-21302		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245112	LPIO-2148	yes							
1241016	LPIO-215	yes	Given the genuine ambitious and vision of the planned regeneration of East Wirral, a stepped approach would seem sensible and the approach should be understood and accepted by National Government. It would allow time to make sure the development takes place in line with environmental policies and the council has the time to ensure the right decisions are made.						
1246920	LPIO-21537		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246926	LPIO-21538		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1247117	LPIO-21687		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247118	LPIO-21688		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247145	LPIO-21795		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247147	LPIO-21796		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247148	LPIO-21903		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247150	LPIO-21904		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1244329	LPIO-22007		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247119	LPIO-22076		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1246678	LPIO-22077		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247151	LPIO-22184		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247152	LPIO-22185		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247153	LPIO-22298		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						

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1247155	LPIO-22299		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247156	LPIO-22406		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247158	LPIO-22407		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1238835	LPIO-2242	yes	Clearly, a stepped approach is the more sensible option. This will allow for more manageable conditions whilst providing future Council's the opportunity to measure demand for housing units. Using a stepped approach, quite quickly we will see the true demand for housing emerge. I would hope that Council is in dialogue with owners of identified brownfield sites, in order to deliver this type of programme.						
1245100	LPIO-2244	yes	Given the possible difficulties of bringing forward all the brown field land in 5 years it seems reasonable to consider option 1b below (allowing a lower build number in the 1st phase), to be compensated later by higher build numbers subsequently as a back up to 1a (assuming that building on brown field sites can go ahead at the required rate) and provided that all efforts are made to deliver option 1a. There is still the possibility that the estimated 12,000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						
1247159	LPIO-22601		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247160	LPIO-22602		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247161	LPIO-22641		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247164	LPIO-22642		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247167	LPIO-22774		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247168	LPIO-22775		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247169	LPIO-22969		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247170	LPIO-22970		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247173	LPIO-23051		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						

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1247174	LPIO-23052		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247175	LPIO-23159		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247176	LPIO-23160		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247177	LPIO-23295		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247178	LPIO-23296		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1247179	LPIO-23297		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1245146	LPIO-2334	yes	The Council needs to allow more time to develop regeneration strategy. Housing targets are excessive as mentioned before.						
1242967	LPIO-23710		As a local resident I wish to respond to the Local plan Issues and Options consultation 2020 as follows: 4. Support a sequential approach to development with sustainable sites being used rather than sites with heritage value or green belt.						
1248389 Highways England	LPIO-23774		In relation to delivering the Option 1B in relation Urban Intensification, pressures on the existing network are of concern to Highways England and sufficient infrastructure will be required to support the level of planned growth. Density in certain area in close proximity to the M53 are of key concern.						
1248438	LPIO-23778		Objects to a stepped approach. There is an urgent need to deliver new housing in Wirral following years of under-delivery and affordable housing needs to be met in the short-term. Deferring housing delivery until later in the emerging Local Plan period (and thus reducing the five-year requirement between 2020-2025) to allow for 'potential' other urban sites to come forward (with no certainty that they will) simply re-affirms what appears to be a determination to avoid any Green Belt release at all costs. Such an approach is not reflective of positive plan-making as set out in paragraphs 15 and 16 of the NPPF. Spatial Option 1B isn't positively prepared or justified and is not consistent with national policy. It should not be pursued.	https://wirral-consult.objective.co.uk/file/5684850	https://wirral-consult.objective.co.uk/file/5657890				
1248448	LPIO-23853		A stepped approach will fail to address the significant under delivery to date and would be contrary to the Framework. The Council accepts that it cannot demonstrate a deliverable five-year supply of housing land. Footnote 6 of the NPPF explains that this means that the tilted balance set out in paragraph 11(d) of the NPPF is engaged and planning permission should be granted unless there are specific policies in the NPPF which provide a clear reason for refusing development or any adverse impact of doing so would significantly or demonstrably outweigh the benefits. Additional deliverable sites are therefore required to address the shortfall and assist the Council in being able to demonstrate and maintain a five-year supply of housing land plus a buffer as required by paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5656108	https://wirral-consult.objective.co.uk/file/5656110				
1242155	LPIO-23864		Option 2a It is proposed that all sites in in table 4.5 should be reviewed against the updated evidence base. In accordance with the proposed Local Plan Objective 7 (Housing) efforts should be made to establish a longer more dispersed list of sites around the Borough. However it is acknowledged that political challenge as opposed to a sound planning methodology is stifling this. The dispersed Green Belt model seems to overly focus on the negative impacts of development. It 'refers to spreading the impact'. This is generally reflected throughout the Issue and Options report with little reference or effort made to acknowledge the benefits of new development, for example to provide homes, jobs, new accessible green spaces and public, income to fund local services, supporting viability of local retail and so on.						

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1242185	LPIO-23906	yes	Yes. Due to the scale of transformational change at Wirral Waters a stepped approach would be entirely reasonable and appropriate to the national and local policies for more effective use of land. We support a stepped approach. There is concern that the local housing need is excessive and that there should be a stepped approach to the first, second and third five years to provide Wirral the possibility of significantly ramping up delivery. There is a genuine capacity issue, relating to the supply of labour and materials associated with the construction sector, particularly during the transitional phase of Brexit, and more recently Coronavirus which has impacted on Chinese production of construction related goods. Therefore we consider a more modest development quantum is adopted with an early review of the housing and employment figures based on performance review of actual completions and market absorption. The Birkenhead Regeneration Framework, which is supported by the Government, the Council, strategic landowner Peel ought to be allowed the chance to succeed. It is considered the over-allocation of Green Belt land would negatively compromise the chances of success.	https://wirral-consult.objective.co.uk/file/5659121	https://wirral-consult.objective.co.uk/file/5684263	https://wirral-consult.objective.co.uk/file/5657006			
1248471	LPIO-23993		There are other strong supporting arguments for a stepped approach. The stepped approach is allowed where there is a significant change in the level of housing required between emerging and previous policies. This is the case on Wirral. The standard method is under review again and the 2018 SNPP releases present lower national and local HH projection numbers than the 2014 and 2016 releases (see 8). Caution is therefore needed in setting medium and long term housing targets. The NPPF requires that local plans be capable of adaptation to rapidly changing circumstances. A stepped approach allows this. In 2021 the next Census may provide a definitive answer on current Wirral population growth. This is just within the start of the first 5-year period of the local plan. A stepped approach can take advantage of this new evidence with no cost to the overall delivery plan. Significantly lower immigration and lower economic growth for several years must reduce the pressure on housing demand. A stepped approach will give time to assess the practical impact on Wirral's needs while protecting the Green Belt. The Council's strategy should lead with Option 1B for flexibility in delivery in the light of the several uncertainties discussed, while demonstrating the potential to meet the full 12,000 government mandated housing number if that should prove necessary; i.e. mandated at the LP inspection. This ideally should be by establishing the 'additional urban housing allocations' proposed in 'Issues & Options' as swiftly as possible to a standard of evidence likely to convince an inspector.	https://wirral-consult.objective.co.uk/file/5657006	https://wirral-consult.objective.co.uk/file/5656963	https://wirral-consult.objective.co.uk/file/5682447	https://wirral-consult.objective.co.uk/file/5684838	https://wirral-consult.objective.co.uk/file/5655882	https://wirral-consult.objective.co.uk/file/5656957
1248472	LPIO-24023		We OBJECT to the possibility of the stepped approach (Option 1b). In this specific area a stepped approach will not assist in meeting the overall number of new homes required in the Plan period due to the viability issues already highlighted by the Council. Having a stepped approach will not mean unviable sites will suddenly be delivered in the Plan period. Additionally, the lead in times and delivery rates of major previously developed sites are not adequately justified at this stage further questioning the appropriateness of a stepped approach.	https://wirral-consult.objective.co.uk/file/5684824	https://wirral-consult.objective.co.uk/file/5684823				
1248487	LPIO-24075		We do not support the proposed 'stepped approach' towards the delivery of new homes in the borough. The Council has not delivered a sufficient supply of new homes in the borough for a considerable period of time. This can be attributed to not having an up-to date development plan with residential allocations which has suppressed the delivery of new homes in the borough. In this context, the Council has failed to deliver its identified need for housing for a significant period of time. It would therefore be inappropriate to adopt a plan which does not allocate a sufficient supply of deliverable land which can come forward in the first five years to meet the identified housing need. This is particularly relevant when we are actively promoting a Site for residential development. The Site has the capacity to deliver up to 33 new dwellings and could come forward in the first five years of the plan period to meet the immediate need for family housing. In this regard, we strongly recommend that that Council identifies a sufficient supply of deliverable land which can come forward in the first five years of the plan period to meet the immediate need, thereby avoiding the need to implement a 'stepped approach' in housing delivery.	https://wirral-consult.objective.co.uk/file/5656330	https://wirral-consult.objective.co.uk/file/5656329				
1244826	LPIO-2416	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1248496	LPIO-24208		United Utilities would suggest a preference for Option 1B, to encourage a higher delivery rate towards the end of the plan period to accommodate the required supporting water supply network to accommodate the levels of growth proposed in areas towards the top of the peninsula in Birkenhead/Bromborough/existing urban areas. This is to assist with any possible lead times to provide the necessary infrastructure and to delay the high delivery rates until we can accommodate any supporting infrastructure	https://wirral-consult.objective.co.uk/file/5684806					
1247798	LPIO-24254		Objects to a stepped approach. There is an urgent need to deliver new housing in Wirral following years of under-delivery and affordable housing needs to be met in the short-term. Deferring housing delivery until later in the emerging Local Plan period (and thus reducing the five year requirement between 2020-2025) to allow for 'potential' other urban sites to come forward (with no certainty that they will) simply re-affirms what appears to be a determination to avoid any Green Belt release at all costs. Such an approach is not reflective of positive plan-making as set out in paragraphs 15 and 16 of the NPPF. Spatial Option 1B isn't positively prepared or justified and is not consistent with national policy. It should not be pursued.	https://wirral-consult.objective.co.uk/file/5684846					
1248466	LPIO-24276		A stepped approach will fail to address the significant under delivery to date and would be contrary to the Framework. The Council accepts that it cannot demonstrate a deliverable five-year supply of housing land. Footnote 6 of the NPPF explains that this means that the tilted balance set out in paragraph 11(d) of the NPPF is engaged and planning permission should be granted unless there are specific policies in the NPPF which provide a clear reason for refusing development or any adverse impact of doing so would significantly or demonstrably outweigh the benefits. Additional deliverable sites are therefore required to address the shortfall and assist the Council in being able to demonstrate and maintain a five-year supply of housing land plus a buffer as required by paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5674415	https://wirral-consult.objective.co.uk/file/5674416	https://wirral-consult.objective.co.uk/file/5685040	https://wirral-consult.objective.co.uk/file/5674418	https://wirral-consult.objective.co.uk/file/5674417	
1248517	LPIO-24284		Option 1B is an unsound approach to plan making, compounding the issues associated with Option 1A. Option 1B clearly fails to make provision to meet the needs of the Borough in the unjustified hope that further land will be brought forward. There is no available evidence to underpin this approach to delivery.						

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1245996	LPIO-24584		A stepped approach will fail to address the significant under delivery to date and would be contrary to the Framework. The Council accepts that it cannot demonstrate a deliverable five-year supply of housing land. Footnote 6 of the NPPF explains that this means that the tilted balance set out in paragraph 11(d) of the NPPF is engaged and planning permission should be granted unless there are specific policies in the NPPF which provide a clear reason for refusing development or any adverse impact of doing so would significantly or demonstrably outweigh the benefits. Additional deliverable sites are therefore required to address the shortfall and assist the Council in being able to demonstrate and maintain a five-year supply of housing land plus a buffer as required by paragraph 73 of the NPPF.	https://wirral-consult.objective.co.uk/file/5681950					
1248588	LPIO-24598		There has been years of under delivery against housing requirements in Wirral. The housing need should be addressed now by allocating sites that can deliver in the short term rather than push back delivery. Within the context of the Government's requirement to review housing requirements within every five years, there is no justification for a 'stepped approach'.	https://wirral-consult.objective.co.uk/file/5681617					
1242697	LPIO-24678		All of the project work, the EOI, Wirral Waters and the rest of Commercial Core, identification of brownfield sites can go ahead and be intensified. The regeneration plans with brownfield there and elsewhere is ripe for the stepped approach. The Local Plan should specify this option in order to synchronise with the regeneration projects, and to ensure regeneration by not diverting development away from regeneration into greenspace. The potential figure of 14,841 in Table 4.2 gives a balance of +2,091 dwellings, which would meet the proposed requirements. This wide range of projected delivery, the inevitable staged nature of development and the three 5-yr phases, point to a stepped approach where Green Belt is not needed in the first 5 years but a further review during the second 5 years could be considered.	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		
1245936	LPIO-24737		<ul style="list-style-type: none"> We do not agree with that the 'stepped approach' would be appropriate to apply. With regards to the referenced site (SHLAA 0642), paragraph E.8 of the Draft Wirral SHMA Report states how Heswall offers "little scope for lower income groups getting a 'foot on the ladder'." The settlement is also recognised as the second highest sub area for overall affordable housing need. There is an annual gross need of 199 affordable units, predominantly 2/3 bed properties, in this area. Any development by us in the borough would seek to be compliant with the preferred approach of affordable housing and provide a minimum of 30%affordable dwellings on-site. Should the Council decide to select smaller, less complicated sites they would begin to meet their clear immediate need for housing in the borough and within Heswall. 						
1248749	LPIO-24869		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	https://wirral-consult.objective.co.uk/file/5684847	https://wirral-consult.objective.co.uk/file/5684848	https://wirral-consult.objective.co.uk/file/5684845			
1248769	LPIO-24990		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	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	

Person ID	ID	Question 4.11 - Based on the fact that some of the proposed Urban sites will take longer to develop, do you agree with a 'stepped housing trajectory approach' provided that our housing targets are met by the end of the plan?	Question 4.11a - Please give reasons for your answer:	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1242541	LPIO-2507	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option 1b (allowing a lower build-number in the first phase, to be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) – provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						
1248823	LPIO-25093		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	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-25201		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	https://wirral-consult.objective.co.uk/file/5684857	https://wirral-consult.objective.co.uk/file/5659562				
1248833	LPIO-25307		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	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		

Person ID	ID	Question 4.11 - Based on the fact that some of the proposed Urban sites will take longer to develop, do you agree with a 'stepped housing trajectory approach' provided that our housing targets are met by the end of the plan?	Question 4.11a - Please give reasons for your answer:	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1248956	LPIO-25369		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible. Our analysis indicates the jobs growth forecast of 0.7% per annum set out in the Liverpool City Region Strategic Housing and Employment Land Market Assessment, 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 would 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.	https://wirral-consult.objective.co.uk/file/5684859	https://wirral-consult.objective.co.uk/file/5677474				
1246763	LPIO-25419		We will support the principle of a stepped approach to facilitate delivery of the Site, under the assumption that in order to implement the necessary infrastructure and site preparation there will have to be a longer lead in period until maximum housing numbers can be achieved. The planning practice guidance states that "a stepped requirement may be appropriate where there is a significant change in the level of housing required and/or where strategic sites may take longer to come forward, but this will need to be evidence based and must not be used to delay unnecessarily delivering development needs". The Wirral has failed the new Housing Delivery Test, highlighting the historic under-delivery of new housing against the assessed requirement for new homes in the Borough. As such, there is a need for significant change in the level of housing required, and this would justify a scaling up in delivery, possibly through allocations that encourage developers to gain planning consent and push through delivery. In November 2016 an investigation into lead-in times and build-out rates of large (500+) and small (50-499) strategic housing sites titled 'Start to Finish How Quickly do Large-Scale Housing Sites Deliver?' was published. The research highlighted several important matters which have a bearing on the delivery rates of large site, including lead-in times; planning approval periods; and time taken for first housing completion after planning approval. In essence larger sites, especially those on Brownfield land, have longer lead-in times but yield greater annual delivery rates when work commences. As none of the sites listed in Appendix 4.2 are over 1,000 dwellings in size, a stepped trajectory would not have a significant impact on the ability of the Council to meet the annual target for housebuilding, especially in the earlier years of the plan period.						
1248986	LPIO-25507		We do not consider that a stepped trajectory is appropriate in this case. National guidance states that 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period'. The Council have not had an up to date Local Plan since the UDP which ran until 2001. The housing market along with national planning policy has significantly changed over the past 20 years. Wirral has restricted the housing supply to a point where there is now a large undersupply, which is also reflected in Housing Delivery Test results. There is an historic shortfall of between 2,354 and 3,479 new dwellings based on the former RSS requirement and the Council's 2016 SHMA. To further delay the development of much required housing will not be in line with the guidance to prepare a positive plan which responds to the housing needs of the Borough. There are still multiple uncertainties over the deliverability of large brownfield sites and regeneration projects. The viability of these projects is questionable and historic evidence suggests that these sites will not be able to be brought forward in the timescales that the Council are proposing. Schemes such as Wirral Waters have had outline planning permission since 2010 and not one house has been delivered. It is not yet confirmed whether these sites, as well as others across Birkenhead, are viable in their current form. This does not provide confidence that these projects are going to be delivered quickly in line with Wirral's proposals. To undertake a stepped approach which relies heavily on the delivery of these sites within the 15-year plan period is unreasonable when over the past 10 years these regeneration projects have delivered minimal housing. A front-loaded phased trajectory would best counteract the undersupply, assist in achieving housing targets and provide the development industry with more confidence, which could lead to further investment into the allocated regeneration schemes put forward for development.	https://wirral-consult.objective.co.uk/file/5662723	https://wirral-consult.objective.co.uk/file/5662725	https://wirral-consult.objective.co.uk/file/5662770			
1249015	LPIO-25577		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible. Our analysis indicates the jobs growth forecast of 0.7% per annum set out in the Liverpool City Region Strategic Housing and Employment Land Market Assessment, 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 would 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.	https://wirral-consult.objective.co.uk/file/5684897					

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1249070	LPIO-25665		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible.	https://wirral-consult.objective.co.uk/file/5684896	https://wirral-consult.objective.co.uk/file/5679650				
1243721	LPIO-2572	yes	It would be impossible to deliver everything at once!! And a focus on the end-goal will help manage pressures by developers to take an easy option by applying for development on green field areas.						
1246458	LPIO-25727		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246459	LPIO-25728		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1242155	LPIO-25863		No this is absolutely not an appropriate approach. Option 1B is effectively pre-meditated planning for failure. Whilst this is clearly a very politically attractive option to appease residents concerns around development it is simply further delaying difficult and challenging decisions that need to be made to support the creation of much needed new homes and employment opportunities. Significant ground on the lack of delivery of homes needs to be made up as a result of many years of under delivery, to suggest accepting yet further delay is wholly unacceptable. It is envisaged that any Local Plan for Wirral making such suggestions against the back drop of lack progress to adopting a Local Plan to date would be held unsound.						
1249100	LPIO-25899 1 of 3		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible. Our analysis indicates the jobs growth forecast of 0.7% per annum set out in the Liverpool City Region Strategic Housing and Employment Land Market Assessment, 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 would 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.	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/5684949	https://wirral-consult.objective.co.uk/file/5677509	https://wirral-consult.objective.co.uk/file/5684951
1249100	LPIO-25899 2 of 3		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible. Our analysis indicates the jobs growth forecast of 0.7% per annum set out in the Liverpool City Region Strategic Housing and Employment Land Market Assessment, 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 would 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.	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	https://wirral-consult.objective.co.uk/file/5677516
1249100	LPIO-25899 3 of 3		Major sites, including Wirral Waters, delivering a large number of homes will require a phased delivery due to the works required to be able to develop them, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes within a small area. However, we do not consider this a sufficient basis for a wider stepped approach, particularly given the delays in producing this Local Plan to date, as this would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39). This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible. Our analysis indicates the jobs growth forecast of 0.7% per annum set out in the Liverpool City Region Strategic Housing and Employment Land Market Assessment, 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 would 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.	https://wirral-consult.objective.co.uk/file/5677507					
1249206	LPIO-26095		I support a sequential approach to development to ensure sustainable sites are developed before those with a heritage value.						
1249271	LPIO-26123 1 of 4		Option 1B is less favourable than Option 1A insofar as it further undermines the Council's ability to deliver housing early within the Plan period and meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73.	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

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1249271	LPIO-26123 2 of 4		Option 1B is less favourable than Option 1A insofar as it further undermines the Council's ability to deliver housing early within the Plan period and meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73.	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
1249271	LPIO-26123 3 of 4		Option 1B is less favourable than Option 1A insofar as it further undermines the Council's ability to deliver housing early within the Plan period and meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73.	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
1249271	LPIO-26123 4 of 4		Option 1B is less favourable than Option 1A insofar as it further undermines the Council's ability to deliver housing early within the Plan period and meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73.	https://wirral-consult.objective.co.uk/file/5678238					
1249269	LPIO-26151		Option 1B would further undermine the Council's ability to deliver housing early within the Plan period and to meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73. If the Council choose to take this approach, they will need to ensure that identified development needs will be fully met in the Plan period. The Council has not provided the evidence to robustly demonstrate that the sites identified for delivery later in the Plan period are viable, deliverable and developable. We would, therefore, not advocate that the Council takes this approach as it will not ensure that housing needs are met.	https://wirral-consult.objective.co.uk/file/5675699					
1249263	LPIO-26176		Option 1B is less favourable than Option 1A insofar as it further undermines the Council's ability to deliver housing early within the Plan period and meet the requirements of the Housing Delivery Test set out within NPPF Paragraph 73.	https://wirral-consult.objective.co.uk/file/5684852					
1249782	LPIO-26427		In Wirral, a large number of homes will be delivered on major sites, including Wirral Waters, which require phased delivery due to the works required to be able to develop sites, resulting in long lead-in times, as well as ensuring the market is not swamped with new homes in a small area. That said, we do not consider this a sufficient basis for a case for a stepped approach, particularly given the experienced delays in producing this Local Plan to date. Such a stepped approach would simply push housing delivery further down the line when there is an evident and acute need for housing delivery now, to deliver the market and affordable homes that are required. The Housing Delivery Test ("HDT") in 2019 shows that the delivery of new homes in Wirral over the previous 3 years was 76%, below the 85% requirement set by Government (NPPF paragraph 73c and footnote 39) and subsequently results in the need to apply a 20% buffer for the first five years of the plan period, to improve the prospect of achieving the planned supply. This poor performance supports a front-loaded trajectory, to rectify the deficits as quickly as possible.	https://wirral-consult.objective.co.uk/file/5683892					
1249219	LPIO-26467		This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.	https://wirral-consult.objective.co.uk/file/5677529	https://wirral-consult.objective.co.uk/file/5677528				
1249812	LPIO-26536		Option 1B follows the same approach outlined under 1A, however, seeks to step delivery so that more dwellings are delivered during years 6-15 with a lower proportion of dwellings during years 1-5. The PPG sets out that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Furthermore, it states that strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs. Given that there has not been a significant change in the level of housing requirement between emerging and existing policies within the Wirral requiring between 680 - 795 homes between 2016 and 2019 and that strategic sites are proposed to deliver across the whole plan period, not just the latter years, a stepped approach is not justified. Our analysis has shown that delivery rates for Wirral Waters are overly optimistic and based on little evidence and as such will not deliver the quantum of development suggested by the Council. As a result, Wirral waters cannot be relied upon immediately or over the lifetime of the plan or used to justify a stepped approach. Given the Wirral's poor previous delivery rates and existing shortfall of 2,304 dwellings, a stepped trajectory with a lower housing requirement in the first 5 years is not appropriate, justified or realistic. Furthermore, the Wirral have an existing shortfall of market homes and affordable homes. In reality this means that a significant number of people cannot access the housing they desperately need. Over 5,500 homes are overcrowded, yet the Council are suggesting a lower delivery rate in the first years. This does not seek to help people buy their own home or raise the quality of lives. It is the wrong approach to deliver less housing over the first five years of the plan, if anything the Council should seek to overdeliver during this period to provide real people with real homes. It is our view that this option simply demonstrates the Council's weak housing supply position, particularly within the first five years where it is impossible to demonstrate a sufficient supply. In light of the above, Option 1B fails the tests of soundness as set out at paragraph 35 of the NPPF.	https://wirral-consult.objective.co.uk/file/5684813	https://wirral-consult.objective.co.uk/file/5684811	https://wirral-consult.objective.co.uk/file/5684812			
1246736	LPIO-26564	no	There has been years of under delivery against housing requirements in Wirral. The housing need should be addressed now by allocating sites that can deliver in the short term rather than push back delivery. Within the context of the Government's requirement to review housing requirements within every five years, there is no justification for a 'stepped approach'						

Person ID	ID	Question 4.11 - Based on the fact that some of the proposed Urban sites will take longer to develop, do you agree with a 'stepped housing trajectory approach' provided that our housing targets are met by the end of the plan?	Question 4.11a - Please give reasons for your answer:	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1240932	LPIO-26605	no	No, we disagree with the Council and believe it would not be appropriate to apply a 'stepped approach' as envisaged by Option 1B. Wirral's critical need for market and affordable homes needs meeting now, rather than kicking the can down the road to later in the plan period and merely delaying the implementation of an unsound strategy. Wirral has experienced persistent and historic under-delivery of homes, accelerating the housing crisis locally at a time when the Government is actively seeking to boost housing numbers. The lack of an up-to-date Local Plan to provide a proactive policy environment has inhibited the delivery of readily-available allocated sites. There is now a severe shortage of new homes, especially affordable homes, in the Borough and Wirral needs a Local Plan which allocates sites that are capable of delivering homes in the short term rather than extending the period of under-delivery even further. It is widely accepted that large housing schemes take time to deliver. The Council needs to allocate sites in its new Local Plan that can deliver in the shortest possible time rather than employing a stepped approach, spreading out delivery from brownfield sites, which in any case, putting aside the viability and deliverability issues outlined elsewhere in our representations, take longer to deliver much-needed new homes than their greenfield equivalent.	https://wirral-consult.objective.co.uk/file/5683689	https://wirral-consult.objective.co.uk/file/5682697	https://wirral-consult.objective.co.uk/file/5682701			
1245180	LPIO-2707	no	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245058	LPIO-2723	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option1b (allowing a lower build-number in the first phase, to be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) – provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						
1237944	LPIO-2732	yes	A stepped approach will allow structural surveys & remedial work on listed Brownfields sites to be completed in the first years of the proposed Local Plan						
1237546	LPIO-2843	yes	Wirral Wildlife supports the stepped approach, as it is not at all certain that Wirral really needs 800 homes pa, given the 2018 ONS statistics and change in policy by central government. If not changed before the Plan is passed, the 5-year review may well show this to be the case. It is important to environmental value and to regeneration that Green Belt sites are not released prematurely. Green Belt release, even if judged necessary, should not be allowed until after the first or second 5-yearly review, so that we do not get the case of Green Belt sites being built first and unnecessarily, causing environmental damage, and sites needing regeneration staying derelict.						
1245159	LPIO-2987	yes							
1245287	LPIO-3105	yes							
1238645	LPIO-3116	no	Whilst a stepped approach would seem to be easier, it will lead to further delay in development. It is impractical to deliver everything at once, however initial planning and preparation can be carried in one place whilst actual development is being carried out elsewhere, so that no site is left to rot and all are ready to go to create a rolling programme of works.						
1241315	LPIO-3274	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245416	LPIO-3370	yes							
1245346	LPIO-3418	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option1b (allowing a lower build-number in the first phase, to be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) – provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						
1238549	LPIO-352	yes	The use of Greenbelt must be opposed. The plan step approach must consider the development phasing without any impact on Wirral green belt.						
1245451	LPIO-3556	yes							
1245462	LPIO-3625	yes							
1237827	LPIO-3787	yes							
1245498	LPIO-3949	no	there should be no building on greenbelt						
1240939	LPIO-4128	yes							
1245638	LPIO-4243	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone. Housing targets must be re-evaluated.						
1239029	LPIO-4336	yes	You will find you do not need 12000 new houses so your problem will solve itself.						
1238379	LPIO-436	yes	Stepped approaches should be to the land that landowners of brownfield are proposing to sell within the Birkenhead zone.						
1245153	LPIO-4364	yes							

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1245501	LPIO-4391	yes	Whilst it may be predicted that a stepped approach is needed to develop required housing in urban areas due to urban clearance and renewal, this should in no way be used as a crutch/reason/excuse to embark on a process where greenfield sites of any origin are developed instead. A brownfield site, by its nature has been previously developed, thus it is impossible to return to its natural pre-developed state i.e. to the same degree of biodiversity and historical natural habitat. Such sites should therefore be the priority. To readily convert green field sites for development due to poor project planning or because bureaucratic incompetence hampers the rapid development of brownfield sites, is neither acceptable, nor recognisable as the actions of a responsible leadership attuned to the opinions of its local residents, nor the future existence natural wildlife inhabitants.						
1244215	LPIO-4538	yes							
1237667	LPIO-4552	yes							
1244629	LPIO-4555		I think this has certain advantages that are worth following. Stepped approaches should be to the land that landowners of brownfield sites are able to sell within the Birkenhead zone. If it takes longer the develop a certain site but the advantages are worth it, then these sites should be prioritised and the funding sort from government.						
1244720	LPIO-4628	yes	a step by step approach to planning is crucial, since central government policy and legislation is likely to change , constant review is needed.						
1237696	LPIO-4704	yes							
1244896	LPIO-4829	yes	ITPAS supports the Stepped Approach of Option 1B. This might also be beneficial in the event that the Council adopts a realistic Need Figure and not the ridiculous 12,000 one. See attached File as text length exceeds 300 words. Yes. Due to the scale of transformational change at Wirral Waters, a stepped approach would be entirely reasonable and appropriate to the national and local policies for more effective use of land. We support a stepped approach.						
1237873	LPIO-4846		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1244896	LPIO-4880	yes	Further Answer as first submission was not recorded fully and accurately: ITPAS supports the Stepped Approach of Option 1B. This might still be beneficial in the event that the Council adopts a realistic Need Figure and not the ridiculous 12,000 one. Yes. Due to the scale of transformational change at Wirral Waters, a stepped approach would be entirely reasonable and appropriate to the national and local policies for more effective use of land. We support a stepped approach.						
1245794	LPIO-4909	yes	Only sensible and realistic way forward.						
1243171	LPIO-4965	yes	Yes with the proviso that your targets are in any case fantasies, and a stepped approach will enable reality to kick in. It should not be used as an excuse to release green belt early in the plan just because it is an easier option to develop.						
1241868	LPIO-5026	yes	Proviso: Landowners may try to "land bank".						
1245713	LPIO-5058	no							
1239571	LPIO-5256	yes	I recognise the significant challenges which will be faced in regeneration of some sites. Time will be needed.						
1242372	LPIO-5318	yes							
1245607	LPIO-5361	yes	The consultation summary document indicates that the option eventually to be taken forward by may be a combination of the options including an element of urban densification and greenbelt development. I am concerned that if this approach was followed, then land owners and developers would prioritise the greenfield sites. This is because they would be more profitable due to there being lower abnormal costs, and higher sale prices. This could leave many areas of urban brownfield undeveloped. I strongly object to any Greenbelt release as Wirral is already significantly urbanised with around 50% developed. Any increase in developed areas would in my opinion adversely affect the appeal to visitors, and future and existing residents. I am also concerned that any development in greenspace could have an adverse impact on the Ecology of the peninsula with loss of trees and vegetation which I feel would send out the wrong message in terms of the Climate Emergency.						
1240383	LPIO-5425	yes	The vision for Wirral Waters clearly identifies that it is capable of delivering large areas to address both housing and employment needs in the future and a stepped approach serves to unlock the availability within an appropriate time scale.						
1245954	LPIO-5502	yes							
1246159	LPIO-5601	yes							
1245073	LPIO-5626	yes	This seems eminently sensible so long as the release of green belt is ruled out to begin with. The stepped approach will lead to a greater chance of success for the Wirral Waters concept and will also allow the Council to gauge the take-up of new houses and tailor the build programme to demand/population growth over the duration of the plan. It will give greater chance to obtain external funding and ensure the areas that are in greatest need of development are not left out.						
1241661	LPIO-5651	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option1b (allowing a lower build-number in the first phase, to be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) – provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive.						

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1245984	LPIO-5723	yes	we would agree with the stepped approach particularly if it preserves the greenbelt by bringing forward brownfield sites at a later period rather than rushing to provide housing early on in the plan period.						
1245767	LPIO-5853	yes	A stepped approach is sensible given that sites will vary according to their deliverability. Concern over shortage during the early years is likely to be overstated given the hugely overstated assessment of housing need.						
1246303	LPIO-5883	yes	A stepped approach seems sensible given the uncertainty of the future. A clearer understanding of the intentions landowners of brownfield sites have is required before completing plans.						
1246310	LPIO-5933	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1242751	LPIO-606	no	Once again assuming that Wirral needs 12000 new dwellings and that Greenbelt will be used. Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246306	LPIO-6071	yes	Far better this than seek development of green belt sites.						
1246339	LPIO-6139	yes							
1238310	LPIO-6151	yes	I believe the stepped approach is the most appropriate approach for the plan Option 1b should have been WBC preferred option. Over 15500 urban plots have been identified. The greenbelt options do not need to be considered using option 1b It keeps the focus on regeneration. It provides a more practical lead in time for approval, planning and procurement of sites. It does not need greenbelt release to be viable option It achieves all the main principles of the NPPF. It can meet the standard target figure without greenbelt release although the practicality of physically delivering 12000 homes at the rate required is unfeasible and the number should be challenged to avoid year on year penalties. All the brownfield sites can be brought forward on typology assessments to enter into the plan at this stage. Guidance Viability 1 Sept 2019 Ministry of Housing, communities and local gov Should every site be assessed for viability in plan making? Assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Plan makers can use site typologies to determine viability at the plan making stage WBC should delay the issue final draft plan to allow time for further assessment and consideration. It also allows a few years for the effect of Brexit on the economy, employment and housing need to filter into the relevant figures before the 5 year local plan review.						
1246161	LPIO-6232	no	From a healthcare perspective this may present an opportunity to access investment and improve health infrastructure but recognises a stepped approach may put unnecessary pressure on health systems in comparison to a phased, more gradual growth in demand.						
1246389	LPIO-6300	yes	The stepped approach is the best one for Wirral as it allows the council to focus new development on brownfield sites mainly in Birkenhead, Liscard and Seacombe, all areas badly needing regeneration.						
1246402	LPIO-6424	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone						
1246425	LPIO-6540	no	As set out in the Framework, local planning authorities should identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Local plans may be able to satisfy the tests of soundness where that have not been able to identify specific sites or broad locations for growth in years 11-15. However, if longer term sites are to be included, for example as part of a stepped requirement, then plan makers will need to demonstrate that there is a reasonable prospect that they are likely to come forward within the timescale envisaged (68-019-20190722, PPG). The viability evidence demonstrates that there is not a reasonable prospect that many of the proposed sites for development will come forward within the timescale envisaged and so a stepped approach is unlikely to satisfy the tests of soundness. Eastham contains sites (including SP050 West of Rivacre Road (parcel 4.14)) that are specific and deliverable for years one to five of the plan period, meaning that a stepped approach is not required.	https://wirral-consult.objective.co.uk/file/5669565					
1241723	LPIO-6562	yes	Given the possible difficulties of bringing forward all the proposed brownfield land for re-development within 5 years, it seems reasonable to consider option 1b (allowing a lower build-number in the first phase. This can then be compensated by higher build numbers subsequently) as a back-up to 1a (assuming that building on brownfield can go ahead at the required rate) Provided that all efforts are made to deliver option 1a. There is still the possibility that the estimate of 12000 new homes being needed, will turn out before the end of the proposed 15 year plan to have been excessive. We may still then work to a possible reduced figure should numbers change.						
1245086	LPIO-6608	yes	I certainly agree with the stepped approach as we definitely need to make full use of the brownfield sites & this will probably need more time. However, I reiterate that the current housing targets are too high.						
1237647	LPIO-676	yes	Beware of using this stepping option to avoid rigorous pressure to achieve the strategic goals.						
1246348	LPIO-6871		Only on brownfield land. Actually no-one knows what any future situation holds - market forces are very tricky to predict. We should value farm and green belt land - that's a priority.						
1241096	LPIO-6899	yes	It makes absolute sense to expect early development to go more slowly, as brownfield sites have to undergo greater preparation, so the stepped approach will take this into account.	https://wirral-consult.objective.co.uk/file/5684262	https://wirral-consult.objective.co.uk/file/5661944				
1246482	LPIO-7028	yes	A stepped approach should also allow landowners of brownfield sites are proposing to sell within the Birkenhead zone.						

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1246488	LPIO-7131		Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1241958	LPIO-741	yes							
1246551	LPIO-7486	no	In response to Q4.11 a stepped approach for the Local Plan would not meet NPPF requirements of achieving deliverability and the Local Plan should therefore bring forward the particular site of Paulsfield Drive Woodland for future housing development immediately so as to make the plan sound in respect of delivering a housing supply within 1-5 years.	https://wirral-consult.objective.co.uk/file/5679681					
1240653	LPIO-7537	yes							
1241770	LPIO-7538	yes							
1240932	LPIO-7612	no	No, Our Client disagrees with the Council and believes it is not appropriate to apply the 'stepped approach' as envisaged by Option 1B. Wirral critically needs market and affordable homes now rather than delaying the implementation of an unsound strategy relying primarily on brownfield sites. Wirral has experienced persistent and historic underdelivery of homes, accelerating the housing crisis locally. The lack of an up-to-date Local Plan to provide a proactive policy environment has inhibited the delivery of readily-available allocated sites. There is now a severe shortage of new homes, especially affordable homes, in the Borough and Wirral needs a Local Plan which allocates sites that are capable of delivering homes in the short term rather than extending the period of underdelivery even further. It is widely accepted that large housing schemes take time to deliver. Research shows that if a scheme of more than 500 dwellings has an outline planning permission, then on average it delivers its first home in around three years. However, large scale brownfield sites deliver at a slower rate than their greenfield equivalents; the average build-out rate for greenfield sites was 34% greater than the equivalent brownfield. Greenfield sites also have shorter planning to delivery periods. It is clear that the Council needs to allocate sites that can deliver the right homes in the shortest possible time. Our Client's approach outlined in our supporting Vision Document of bringing forward development of varying scales across our landholding would deliver new dwellings and supporting infrastructure from early-on in the plan period, negating the need for a stepped approach relying on unviable, undeliverable and inappropriate sites. We look forward to engaging proactively with the Council in bringing forward land immediately to meet the Borough's needs. More details can be found at paragraphs 5.22 to 5.26 of our full representations.	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-7644	yes	This is essential because the Council needs more time to consolidate its regeneration strategy. Figure for post completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision of new dwellings required in the first five year phase of the Plan						
1243342	LPIO-773	yes							
1246592	LPIO-7735	yes	So long as no greenbelt land is released						
1246594	LPIO-7803	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1245690	LPIO-7893	yes							
1246591	LPIO-7896	no	We should not seek to take the easy option - site viability can be achieved through hard work and collaborative working						
1240903	LPIO-7901	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246596	LPIO-8032	yes							
1246605	LPIO-8144	no	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone						
1245434	LPIO-8311	yes							
1246612	LPIO-8314	yes	Get plan right first and it will take time to get everyone, and investment, on-board but plan will then deliver for generations to come. As housing need is over-exaggerated at this time there is no urgency for houses now anyway Get the vision and the plan right						
1237882	LPIO-8345	yes	Stepped approaches should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1237748	LPIO-8501	yes	This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1237832	LPIO-8608	yes	It would seem sensible to phase the development work so as to deal with the planning difficulties in the earlier years. It is also possible that the overall figure for housing development will not sustain over the 15 year period and could be reduced						
1246598 Hoylake Vision	LPIO-8689	yes							
1243448	LPIO-869	yes	To preserve green belt/field sites and to allow periodic reviews of housing need and corresponding adjustments to proposed development plans and therefore the numbers and locations of homes to be built.						
1246631	LPIO-8713	yes							

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1246544	LPIO-8783	yes	Given the acknowledged difficulty of developing the larger intended sites, the stepped approach makes eminent sense, particularly if the alternative is building on Green Belt, but with the proviso that every effort is made to deliver option 1a. If the widespread concern proves correct, that the estimates of housing need may be excessive, it is quite possible that the 12,000 proposed homes will not in fact be needed before the end of the plan.						
1245034	LPIO-8826	yes							
1246286	LPIO-8896	yes							
1246651	LPIO-9005	yes	Given the possible difficulties of bringing forward all the proposed Brownfield land for redevelopment within 5 years, it seems reasonable to consider option 1B (allowing a lower build number in the first phase to be compensated by higher build numbers subsequently) as a backup to 1A (assuming that building on Brownfield can go ahead at the required rate) - provided that all efforts are made to deliver option 1A. There is still the possibility that the estimate of 12000 new homes being needed will turn out before the end of the proposed 15-year plan to have been excessive.						
1239377	LPIO-9012	yes	Due to the magnitude of transformation at Wirral Waters, a stepped approach would be both reasonable and appropriate in keeping with national and local policies for more effective land use.						
1246667	LPIO-9030	yes							
1240872	LPIO-9036	yes	If you have to deliver so many houses and will protect the greenbelt then its inevitable that you will have to deliver more houses in the later years. Given though that future growth projections will likely show further reduction in demand its difficult to see why it is even necessary in the first place.						
1237724	LPIO-9085	yes	If this contains an element of green belt first then brownfield sites - this would be absolutely the wrong way around. However if the approach is merely to delay building in the early years and then make up for it later then this will fit well with the new economic regime that we will all be facing. The Council now needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings failed to take account of unregistered completions and this would reduce the size of new dwellings required in the first five years of the Plan.						
1237807	LPIO-9194	yes	Provided that you know what your revised housing targets are						
1246678	LPIO-9318	yes	This would allow for the reduction in the number of dwellings required, as per the studies that have been carried out but that the Council have chosen to ignore.						
1246624	LPIO-9335	yes							
1241495	LPIO-9429	yes	I support the stepped approach. It is doubtful if Wirral needs 800 homes pa. It is important that Green Belt sites are not released prematurely. Green Belt land should only be released as a last resort and when judged to be absolutely necessary. It should not be allowed until after the first or preferably the second 5-yearly review. Green Belt sites should not be developed whilst urban sites, in need of regeneration, remain derelict.						
1245289	LPIO-9445	yes							
1246712	LPIO-9592	no	Please see our attached statement for our full case.						
1242554 Port Sunlight Village Trust	LPIO-9650	yes							
1246693	LPIO-9705		Again I'm not prepared to answer yes or no as I believe this will be mis used by the council. The question seems flawed as the council are insisting on using the standard calculation. If a stepped approach were to be used this should be to the land that landowners of brownfield sites are proposing to sell within the Birkenhead zone.						
1246720	LPIO-9717	no	No, a stepped approach will fail to address the significant under delivery to date and would be contrary to the Framework. Indeed, the Council accepts that it cannot demonstrate a deliverable five year supply of housing land. Footnote 6 of the NPPF explains that this means that the tilted balance set out in paragraph 11(d) of the NPPF is engaged and planning permission should be granted unless there are specific policies in the NPPF which provide a clear reason for refusing development or any adverse impact of doing so would significantly or demonstrably outweigh the benefits. Additional deliverable sites are therefore required to address the shortfall and assist the Council in being able to demonstrate and maintain a five year supply of housing land plus a buffer as required by paragraph 73 of the NPPF.						
1246691	LPIO-9762	yes	This is essential because the Council needs more time to consolidate its regeneration strategy. Figures for past completions of new dwellings in the Plan have failed to take account of a significant number of unregistered completions which would reduce the size of the provision for new dwellings required in the first five-year phase of the Plan.						
1245994	LPIO-9963	yes	Yes This seems eminently sensible so long as the release of green belt is ruled out to begin with. The stepped approach will lead to a greater chance of success for the Wirral Waters concept and will also allow the Council to gauge the take-up of new houses and tailor the build programme to demand/population growth over the duration of the plan. It will give greater chance to obtain external funding and ensure the areas that are in greatest need of development are not left out.						