

Person ID	ID	Question 5.2 - Do you agree with our preferred approach of seeking to achieve 30% affordable housing from all new developments of 10 dwellings or over subject to viability, based on the mix of size and tenure recommended in the Draft SHMA 2020? If not, what alternative approach would you suggest and why?	Question 5.2a - If you answered No, what alternative approach would you suggest and why? If you answered Yes, you can comment here.	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246544	LPIO-10038	no	An "aspiration" for 30% so-called affordable homes is too weak and too low. The commutable sum scheme does not work; the lower cost housing simply doesn't get built. If necessary, the Council should borrow to ensure the building of the appropriate housing - as long as this would not allow developers to make excess profit at the tax-payer's expense. There are good examples in the country, such as (the award-winning) development of Goldsmith St in Norwich, and the planned Parc Hadau in Pontardawe.						
1241337	LPIO-10170	yes							
1245044	LPIO-10182	no	You should be more ambitious and increase the percentage as much as possible. 30% is not enough.						
1246747	LPIO-10196	yes	However, I would want to see a guarantee that this affordable housing went to those who needed it and was not snapped up by landlords.						
1246763	LPIO-10349	no	The Issues & Options paper states that "A final judgement on what will be viable to require and where can only be made once the full range of likely Local Plan requirements have been agreed and assessed and will be included in the draft Local Plan, taking account of any comments submitted, based on the viability assessment to be prepared alongside the draft Local Plan." This approach is supported, subject to the presentation of evidence that states future schemes will continue to be viable. Within the Wirral, the average past annual delivery rate for affordable housing has been 175 dwellings per annum, from the period of 2004-05 to 2014-15. Despite the very high need for affordable housing identified in the Wirral SHMA and Housing Needs Study (May 2016), and there is a clear need to consider an uplift in order to correct for past under-supply. As is outlined within the Planning Practice Guidance, a fundamental element of calculating the OAN for housing is considering market signals and where worsening trends are identified, adjusting planned housing figures upwards, as stated within the PPG which advises that: "An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." Our Client would assist Wirral Borough Council in providing evidence to support the level of development on the Site. In order to seek to deliver the overall affordable housing targets over the plan period and to allow for viability to be fully considered, we therefore consider that the overall housing need figure for the Wirral to be increased to take into account the acute need for affordable housing.						
1246717	LPIO-10409	yes	Any such future affordable housing policy that requires a certain proportion of units within residential developments to meet the definition of affordable should be subject to viability, so as to not constrain development on sites with site specific constraints. Affordable housing need analysis set out in within the SHMA 2020 reveals that there is a net annual imbalance of 705 affordable dwellings across the borough. The SHMA considers a 30% affordable housing target therefore necessary. As acknowledged within Table 4.4 reliance on less viable sites could reduce 'planning gains', such as the future provision of affordable housing in market housing development. The allocation of additional suitable sites within the Green Belt would help deliver significant amounts of affordable housing necessary to enable the Wirral Local Plan to be considered sound. Given that the vast majority of Settlement Area 8 in which the Site is located lies within the Green Belt, Land to the south of Clatterbridge Hospital represents perhaps one of the few substantial opportunities to deliver new affordable housing on previously developed land.						
1241065	LPIO-10413	yes							
1241629	LPIO-10419	yes							
1246724	LPIO-10481	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1246778	LPIO-10551	no	That does suit some areas with higher deprivation indices, particularly in East side of Wirral, but inappropriate in other areas on West Wirral. Need to differentiate between the various areas.						
1248825	LPIO-10694	no	It is necessary for the approach to affordable housing (and other contributions) to reflect the viability challenges in inner Wirral.	<a href="https://wirral-consult.objective.co.uk/file/5684264">https://wirral-consult.objective.co.uk/file/5684264</a>					
1246242	LPIO-10966		Yet another devious question. The housing numbers advocated are wrong, therefore any percentage figure is vastly disproportionate. There is a need for social / council housing which can adequately be achieved by developing Wirral Waters. Why are the Council reluctant to further this development?						
1243890	LPIO-1112	yes							
1247196	LPIO-11588	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247214	LPIO-12415	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247492	LPIO-12515	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						

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1244681	LPIO-1265	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1240843	LPIO-12678	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247578	LPIO-12876	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247510	LPIO-13000	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246009	LPIO-13078		I very much support the proposals to increase the amount of social and affordable housing.						
1244531	LPIO-13121	yes	Yes. Affordable Housing is the greatest need on the Wirral at present and for the foreseeable future.						
1246335	LPIO-13135	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246578	LPIO-13340		I continue to challenge the need for the number of housing suggested. The housing that is required is social housing in existing urban areas						
1246853	LPIO-13391	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246852	LPIO-13514	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247750	LPIO-13604		Having studied the options for Wirral's Local Plan ,we should like to make the following comments. It is apparent that there is a requirement for affordable homes to be built on the Wirral and this must be done in a way that minimises changing the unique characteristics and charm of the Wirral .						
1247195	LPIO-13615		<ol style="list-style-type: none"> <li>1. The Council has not yet established that there will be a demand for affordable homes. I cannot recall Birkenhead, Wallasey being in a "worse" state. What will be the effect of Brexit? Will the position become worse as a result? Liverpool has certainly attracted customers away from Wirral. Birkenhead, as a shopping centre, appears to be dead!</li> <li>2. Wirral has plenty of land available, i.e. the docks and brown belt land and in probability there would be no need to release any significant green belt land in the area.</li> <li>3. The Deeside part of the Wirral has significant greenbelt land BUT the release of such land would not satisfy demand for affordable homes as any properties on such land would be too expensive.</li> <li>4. The whole property market in Wirral is "fragile" to say the least. Demand for affordable homes will inevitably start at the bottom end of the market, not at the top.</li> <li>5. If there is an unsatisfied demand for more expensive homes, then the Council will have to reconsider its greenbelt policy and, if necessary, release land to satisfy such demand.</li> <li>6. Developers wish to develop greenbelt land as fewer costs involved in clearing the site, Brown belt land can obviously be more expensive for a developer to use.</li> <li>7. What happens in the South, is of no consequence to the Wirral. The Council MUST consider the needs of Wirral as a whole and not a particular section of it, or any requirements of the Government. Wirral needs a sensible, stable property policy based on facts and not on some unsustainable growth proposal. The Council needs to "stop" the existing divide between Merseyside and Deeside; needs all residents to work towards a common goal, it needs to raise money creatively and it needs to spend such money prudently. So far, the Council has been totally divisive.</li> </ol>						
1247746	LPIO-13670	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1241412	LPIO-138	no	There should be a higher percentage of affordable housing. New housing should also not be sold to buy to let investors but to real residents.						
1242183	LPIO-13988	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247218	LPIO-14082	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247219	LPIO-14186	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						

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1243700	LPIO-1426	no	Comment the same as 5.1						
1247220	LPIO-14287	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247222	LPIO-14416	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247226	LPIO-14505	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247245	LPIO-14595	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247829	LPIO-14658		I would agree to the principle of setting a minimum proportion of affordable housing in developments of say 10 dwellings or over, without the caveat 'subject to viability'. Affordable should not mean of lesser building quality.						
1246827	LPIO-14722	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1245343	LPIO-1483	yes							
1247246	LPIO-15341	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1244901	LPIO-1545	yes							
1247248	LPIO-15456	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247251	LPIO-15560	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247252	LPIO-15651	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247274	LPIO-15751	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247275	LPIO-15878	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247936	LPIO-16011	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247287	LPIO-16217	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247344	LPIO-16305	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247349	LPIO-16392	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1244969	LPIO-1644	yes	The WBC housing numbers figure needs to be revisited						
1247353	LPIO-16480	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247434	LPIO-16672	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247935	LPIO-16729	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1247436	LPIO-16781	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						

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1244782	LPIO-1685	yes							
1247437	LPIO-16926	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247439	LPIO-16927	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247441	LPIO-17079	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247960	LPIO-17200	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247962	LPIO-17287	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247966	LPIO-17393	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247971	LPIO-17497	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1241726	LPIO-17596	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247979	LPIO-17722	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247980	LPIO-17723	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1245502	LPIO-17884	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247541	LPIO-17982	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1238043	LPIO-1799	yes	A strict approach is necessary to rule out any subsequent pleas of unavailability.						
1242537	LPIO-17991		The Council's targets for affordable housing are too low as we should be aiming for enough affordable housing to meet the needs of the homeless and people on waiting lists. If developers do not wish to provide a high proportion of affordable housing the Council should obtain funds to build Council houses or incentivise social housing providers to build them.						
1247539	LPIO-18091	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1247983	LPIO-18132		I believe we need far more affordable housing than that put forward by the Council to meet the needs of the homeless and those on waiting lists for social housing. If developers do not wish to provide a high proportion of affordable housing the Council should.						
1247996	LPIO-18248	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1237857	LPIO-18271		No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1245060	LPIO-1852	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1248026	LPIO-18890		I would like to take the opportunity to submit some comments on the above plan. I prefer to write them in the form of this letter rather than take the opportunity to provide answers to the related questionnaire. My comments are as follows: I very much support the proposals to increase the amount of social and affordable housing.						

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1237833	LPIO-19770		The Draft SHMA (2019) identifies a net annual imbalance of 705 affordable dwellings across the Borough. It suggests a tenure split of 60% social rented and 40% intermediate tenure. It provides a general split in dwelling size based on the household survey of 17.2% 1-bed, 46.8% 2-bed, 29.7% 3-bed and 6.3% 4-bed. The HBF does not dispute the need for affordable housing within the Wirral and indeed supports the need to address the affordable housing requirements of the borough. However, the NPPF is clear that 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'. The 2018 Local Plan Baseline Viability Study shows that affordable housing is not viable in Zone 1 on brownfield or greenfield sites. It also shows that within Zone 2 affordable housing is not viable in Zone 2 on brownfield sites at 30dph, at 35dph on brownfield sites only three of the five schemes tested can support 10% affordable housing. No brownfield development in Zone 2 can support above 20% affordable housing. Greenfield sites in Zone 2 also show viability issues with no greenfield sites at 30dph being able to support the 30% affordable housing requirement and only three of the 35dph schemes able to support the 30% requirement. Therefore, the HBF recommend that the Council consider a lower affordable housing requirement across the Borough to ensure viability and housing delivery. It is also noted that the Viability Assessment has been undertaken with a tenure split of 50% Affordable Rent and 50% Intermediate dwellings, this differs from the Preferred Approach requirements, and may have over-inflated the viability of development. The HBF would also highlight, that the housing mix from the SHMA only provides a snapshot in time and there may be more up to date or appropriate evidence at the time of the application, that may impact on the appropriate tenure split or house size. Therefore, the HBF would recommend that the Council provide greater flexibility within the policy to acknowledge that the split may be different from that identified in the Preferred Approach.						
1241989	LPIO-20891		The Council's targets for affordable housing are too low. We should be aiming for enough affordable housing to meet the needs of the homeless, sofa surfers and people on waiting lists for social housing. If developers do not wish to provide a higher (45% minimum) proportion of affordable housing the Council should obtain funds to build Council houses or incentivise social housing providers to build them.						
1246851	LPIO-21174	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246918	LPIO-21336	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246924	LPIO-21337	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246928	LPIO-21338	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246920	LPIO-21561	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246926	LPIO-21562	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1245112	LPIO-2157	yes							
1238379	LPIO-2219	no	The Council should be providing social housing in the areas that need them.						
1248150	LPIO-22464		The Council's targets for affordable housing are too low. We should be aiming for enough affordable housing to meet the needs of the homeless, sofa surfers and people on waiting lists for social housing. If developers do not wish to provide a higher (45% minimum) proportion of affordable housing the Council should obtain funds to build Council houses or incentivize social housing providers to build them.						
1245100	LPIO-2255	no	An "aspirational" 30% "affordable homes is too weak. If private developers "cannot afford" to supply affordable homes then the council needs to borrow to build homes. Providing publicly owned housing will address affordability far more effectively than loosely worded "affordability targets", which developers can easily avoid.						
1248151	LPIO-22670		Require that the new homes to be built are for social housing and that they are genuinely affordable (I suggest in line with housing benefit levels and not to be based on a random percentage of market rents).						
1248296	LPIO-22793		Building should also reflect the need to build new council and social housing homes, rather than market value homes of which there are already plenty. The need for social housing is far greater at a time when house prices are several times the median income even for those fortunate enough to be working in regular employment. We should focus first on regenerating the most deprived areas, such as Seacombe.						

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1248311	LPIO-23001		The Council's targets for affordable housing are too low. We should be aiming for enough affordable housing to meet the needs of the homeless, sofa surfers and people on waiting lists for social housing. If developers do not wish to provide a higher (45% minimum) proportion of affordable housing the Council should obtain funds to build Council houses or incentivise social housing providers to build them.						
1237870	LPIO-2321	no	I disagree with any houses being built on GREENBELT. If "Affordable" houses are to be built it is IMPORTANT that they are built close to where the jobs are. At present there is a need for affordable housing on East Wirral. The Development Plan should concentrate on these areas and bring those areas in need of regeneration up to "standard".						
1245146	LPIO-2344	yes							
1248438	LPIO-23795		In view of the affordability issues facing the Borough, we have no objection to the proposed requirement provided that it is fully viability tested. ; Paragraph 5.11 refers to further viability work which will be undertaken prior to the publication of the draft Local Plan to inform the Council's final position. Accordingly, we reserve final judgment on this until such time that all other emerging Local Plan policies have been tested to assess their impact on scheme viability. However, we do have concerns with the specific affordable housing mix requirements which are set out in the Council's preferred approach. A 'one size fits all' to housing mix should not be adopted, as it is not the case that the same housing mix is appropriate for each location taking account of local needs, site characteristics and surroundings and viability issues. Requiring developers to adhere to a specific affordable housing mix is likely to result in lengthy discussions around viability (should a different mix be proposed), ultimately resulting in delays to the planning process and housing delivery. These are delays which Wirral simply cannot afford and can be avoided through the plan-making process. Instead, it is considered that any housing mix, if one is pursued, should be presented as an indicative mix, with a range per dwelling type (i.e. X% - X%).	<a href="https://wirral-consult.objective.co.uk/file/5684850">https://wirral-consult.objective.co.uk/file/5684850</a>	<a href="https://wirral-consult.objective.co.uk/file/5657890">https://wirral-consult.objective.co.uk/file/5657890</a>				
1242185	LPIO-23917	yes	Yes. We agree that 64% of the affordable housing provision should be two bedroomed or less, as it is important to reflect the demographic structure and this identifies a large proportion of elderly households. If older occupants of affordable housing have quality smaller homes to relocate into it would help to free up larger family homes for those that need them. Local Plan policies need to accord with NPPF Paragraphs 34, 57 and 62 so that the contributions expected from developers are clearly set out and "planning applications that comply with them should be assumed to be viable", and importantly that affordable homes of the size and type required are delivered on-site. It is more difficult to achieve affordable homes completed by developer contributions for off-site provision due to the lack of land availability and the fact most Councils are not geared up to build homes themselves, even if the Government may allow Councils to raise funds for this purpose. The legal judgment in [2018] EWHC 991 (Admin) established that land value must be informed by policy, and consequently, it is not acceptable for the Council to grant permission for an application that is deficient in developer contributions. Therefore the policy must be right. If not, it would be contrary to the principle of plan-led sustainable development and it would set a worrying precedent for Wirral's communities.	<a href="https://wirral-consult.objective.co.uk/file/5659121">https://wirral-consult.objective.co.uk/file/5659121</a>	<a href="https://wirral-consult.objective.co.uk/file/5684263">https://wirral-consult.objective.co.uk/file/5684263</a>	<a href="https://wirral-consult.objective.co.uk/file/5657006">https://wirral-consult.objective.co.uk/file/5657006</a>			
1248472	LPIO-24047		The SHMA states that the net shortfall of affordable homes each year is 705 dwellings. Given that the housing requirement is being set at 800 dwellings per annum it is evident that continuing problems with affordable housing delivery will persist under the provisions of the emerging Plan. The PPG allows authorities to take these circumstances into account and establish a higher level of need than the standard method suggests.	<a href="https://wirral-consult.objective.co.uk/file/5684824">https://wirral-consult.objective.co.uk/file/5684824</a>	<a href="https://wirral-consult.objective.co.uk/file/5684823">https://wirral-consult.objective.co.uk/file/5684823</a>				
1248475	LPIO-24050		It is strongly recommended that the Council updates its Strategic Housing Market Assessment [SHLMA] to take into account the full range of affordable tenures listed within the definition of affordable housing at Annex 2 of the NPPF. This will provide the Council with a firm evidence base upon which it can take Local Plan production forward, which can then be subject to testing at Examination. We note that the SHMA includes tables (4.19 & 4.22), outlining the annual income required to rent and purchase a property in the area and comparing house prices to various incomes. This analysis clearly demonstrates the difficulties faced by many households in accessing housing on the open market, particularly due to the deposit barrier. The analysis shows this also affects important key workers such as teachers, nurses and police officers. As such, rent to buy and more specifically our model of affordable rent-to-buy can play a vital role in helping those hard-working families and households unable to access ownership. We can assist in meeting local need, allocating all of its residents through the Housing Allocation Scheme; by enabling real savings to be built-up while renting at an affordable rent the Council can help meet the needs of low and middle income households, providing greater choice and flexibility in the planning system.	<a href="https://wirral-consult.objective.co.uk/file/5684851">https://wirral-consult.objective.co.uk/file/5684851</a>					
1248487	LPIO-24078		Whilst we acknowledge the requirement for new developments to secure the delivery of affordable homes, this needs to be balanced against the viability of schemes, and the need for affordable homes in the area. The Council needs to undertake a robust assessment of sites to understand whether the viability of schemes would be compromised with a requirement to deliver 30% affordable housing. This needs to be considered in the context of other policy requirements, together with site specific infrastructure requirements. Whilst we acknowledge the Local Plan Viability Study, this was undertaken in 2018 and does not reflect the current market situation and should be updated.	<a href="https://wirral-consult.objective.co.uk/file/5656330">https://wirral-consult.objective.co.uk/file/5656330</a>	<a href="https://wirral-consult.objective.co.uk/file/5656329">https://wirral-consult.objective.co.uk/file/5656329</a>				
1248487	LPIO-24079		We request that any policy pertaining to affordable housing incorporates a degree of flexibility whereby offsite provision or contribution in lieu can be delivered where it has been demonstrated that onsite provision is neither achievable nor appropriate. The latter is particularly pertinent in the context of a Site where it would be more appropriate to deliver a contribution in lieu of onsite provision. This is due to the Site's location, and also on the premise that the proposed scheme comprises four and five bedroom dwellings which have received limited interest from Registered Providers. The feedback from our public engagement was that there was no local demand for affordable housing within the area of the Site. This was on the premise that affordable housing provision would require smaller housing types which would not reflect the character of the surrounding residential development and the local built vernacular.	<a href="https://wirral-consult.objective.co.uk/file/5656330">https://wirral-consult.objective.co.uk/file/5656330</a>	<a href="https://wirral-consult.objective.co.uk/file/5656329">https://wirral-consult.objective.co.uk/file/5656329</a>				

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1248490	LPIO-24104		The emerging WLP ignores the housing affordability crisis and makes no provision to address this issue. If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs. The WLP/O document does not acknowledge that by providing the bare minimum housing figure risks worsening the housing crisis in Wirral, which is one of the least affordable areas on Merseyside, with recent ratios outstripping even national growth rates. Affordable housing need in Wirral is extremely high as indicated in the Council's own evidence and simply cannot be addressed if pursuing an overall housing target of 800dpa. The Council's 2020 SHMA (prepared by Arc4) suggests that 705 affordable homes are needed per annum and our analysis indicates that a more realistic level of housing need would be in the order of 1,223 dpa with the backlog addressed in fully over 5 years. An increase in the housing requirement for Wirral is required to align with economic aspirations and deliver additional affordable housing in Wirral to meet the considerable need.	<a href="https://wirral-consult.objective.co.uk/file/5676992">https://wirral-consult.objective.co.uk/file/5676992</a>	<a href="https://wirral-consult.objective.co.uk/file/5673252">https://wirral-consult.objective.co.uk/file/5673252</a>	<a href="https://wirral-consult.objective.co.uk/file/5673251">https://wirral-consult.objective.co.uk/file/5673251</a>	<a href="https://wirral-consult.objective.co.uk/file/5684856">https://wirral-consult.objective.co.uk/file/5684856</a>	<a href="https://wirral-consult.objective.co.uk/file/5684866">https://wirral-consult.objective.co.uk/file/5684866</a>	<a href="https://wirral-consult.objective.co.uk/file/5684853">https://wirral-consult.objective.co.uk/file/5684853</a>
1247798	LPIO-24261		In view of the affordability issues facing the Borough, we have no objection to the proposed requirement provided that it is fully viability tested; it is noted that paragraph 5.11 of the I&O document refers to further viability work which will be undertaken prior to the publication of the draft Local Plan to inform the Council's final position. Accordingly, we reserve final judgement on this until such time that all other emerging Local Plan policies have been tested to assess their impact on scheme viability. However, we do have concerns with the specific affordable housing mix requirements which are set out in the Council's preferred approach. It is considered that a 'one size fits all' to housing mix should not be adopted – it is not the case that the same housing mix is appropriate for each location taking account of local needs, site characteristics and surroundings and viability issues. Requiring developers to adhere to a specific affordable housing mix is likely to result in lengthy discussions around viability (should a different mix be proposed), ultimately resulting in delays to the planning process and housing delivery. These are delays which Wirral simply cannot afford and can be avoided through the plan-making process. Instead, it is considered that any housing mix, if one is pursued, should be presented as an indicative mix, with a range per dwelling type (i.e. X% - X%).	<a href="https://wirral-consult.objective.co.uk/file/5684846">https://wirral-consult.objective.co.uk/file/5684846</a>					
1244826	LPIO-2432		No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers of 12,000 so the objective is wrong to start with.						
1248542	LPIO-24392	yes	Strongly agree that any threshold should be imposed with a 'subject to viability' clause. There are many brownfield development sites in Wirral where the viability is finely balanced and requiring 30% provision of affordable homes could sterilise their development. It is suggested that the Council should consider whether there is an opportunity to categorise the Wirral's housing market by its market performance (i.e. 'hot', 'moderate' and 'cold' or similar), so that policy targets for affordable housing (and where necessary associated off-site contributions) could be set based on the individual housing sub-market aligned with the market condition (i.e. poor, normal and good) at any specific point in time during the life of the plan period.	<a href="https://wirral-consult.objective.co.uk/file/5684894">https://wirral-consult.objective.co.uk/file/5684894</a>					
1248551	LPIO-24416		In principle, we support the preferred approach which seeks to achieve up to 30% affordable housing on all qualifying schemes of 10 dwellings or more. This policy will need to be tested in more detail through a full viability assessment to take account of the Local Plan requirements as a whole. Notwithstanding this, we are concerned that the level of affordable housing the Council is seeking to deliver will fall significantly short of the Borough's full affordable housing needs. The Council's evidence suggests an imbalance of over 700dpa. This is a significant figure representing 90% of total annual housing needs. Given the viability pressures within the Borough, it is essential that affordable housing needs are delivered in full. In accordance with the PPG, the total affordable housing need will need to be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing requirement included in the plan should be considered where it could help deliver the required number of affordable homes.	<a href="https://wirral-consult.objective.co.uk/file/5655918">https://wirral-consult.objective.co.uk/file/5655918</a>					
1245996	LPIO-24590		The proposed strategy would not deliver the proposed target of 705 affordable homes per annum and there is no substantive analysis provided in the Local Plan as to how this affordable housing need will be met. There is an overreliance upon locations and sites where affordable housing is unlikely to be viable.	<a href="https://wirral-consult.objective.co.uk/file/5681950">https://wirral-consult.objective.co.uk/file/5681950</a>					
1242697	LPIO-24690		Most development in Wirral is on smaller sites where 30% (or even 10%) makes no sensible or economic sense whatsoever. Sites with 10 dwellings (houses or flats) would be expected to have 3 affordable dwellings – 3 out of 10 or even 6 out of 20 would reduce significantly the viability of such developments. Developers will present cases to have the lowest or zero affordability. The trajectory of affordable housing is then uncertain. Affordability is clearly best in the lowest price settlement areas. It makes more sense to focus affordable housing in such areas. This may not mean securing a percentage to be affordable but working with developers to create an affordable area/ development as a whole. In some settlement areas (Settlement Areas 2 and 3 in particular) this should be explored to maximise the potential of cheaper land. It seems viable and sensible to continue with the 10% provision which NPPF, para 64 sets out.	<a href="https://wirral-consult.objective.co.uk/file/5659118">https://wirral-consult.objective.co.uk/file/5659118</a>	<a href="https://wirral-consult.objective.co.uk/file/5659119">https://wirral-consult.objective.co.uk/file/5659119</a>	<a href="https://wirral-consult.objective.co.uk/file/5659120">https://wirral-consult.objective.co.uk/file/5659120</a>	<a href="https://wirral-consult.objective.co.uk/file/5659121">https://wirral-consult.objective.co.uk/file/5659121</a>		
1248749	LPIO-24884		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5684847">https://wirral-consult.objective.co.uk/file/5684847</a>	<a href="https://wirral-consult.objective.co.uk/file/5684848">https://wirral-consult.objective.co.uk/file/5684848</a>	<a href="https://wirral-consult.objective.co.uk/file/5684845">https://wirral-consult.objective.co.uk/file/5684845</a>			

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1248769	LPIO-25004		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5659045">https://wirral-consult.objective.co.uk/file/5659045</a>	<a href="https://wirral-consult.objective.co.uk/file/5684957">https://wirral-consult.objective.co.uk/file/5684957</a>	<a href="https://wirral-consult.objective.co.uk/file/5659039">https://wirral-consult.objective.co.uk/file/5659039</a>	<a href="https://wirral-consult.objective.co.uk/file/5659038">https://wirral-consult.objective.co.uk/file/5659038</a>	<a href="https://wirral-consult.objective.co.uk/file/5684956">https://wirral-consult.objective.co.uk/file/5684956</a>	
1248823	LPIO-25108		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5674137">https://wirral-consult.objective.co.uk/file/5674137</a>	<a href="https://wirral-consult.objective.co.uk/file/5684865">https://wirral-consult.objective.co.uk/file/5684865</a>	<a href="https://wirral-consult.objective.co.uk/file/4684849">https://wirral-consult.objective.co.uk/file/4684849</a>			
1248832	LPIO-25217		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5684857">https://wirral-consult.objective.co.uk/file/5684857</a>	<a href="https://wirral-consult.objective.co.uk/file/5659562">https://wirral-consult.objective.co.uk/file/5659562</a>				
1248833	LPIO-25322		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5661125">https://wirral-consult.objective.co.uk/file/5661125</a>	<a href="https://wirral-consult.objective.co.uk/file/5661100">https://wirral-consult.objective.co.uk/file/5661100</a>	<a href="https://wirral-consult.objective.co.uk/file/5661124">https://wirral-consult.objective.co.uk/file/5661124</a>	<a href="https://wirral-consult.objective.co.uk/file/5661129">https://wirral-consult.objective.co.uk/file/5661129</a>		
1248956	LPIO-25391		Given the known affordability issues, we support the Council's preferred approach for 30% affordable housing. We are encouraged that the policy requirement will be fully tested and accommodated in the high-level viability appraisal, before being included in the Draft Local Plan. However, the current sites that are included within the proposed urban housing allocations and those which are intended to be intensified, are not viable to deliver affordable housing, which will result in a significant shortfall of affordable housing within the Borough. The Council's Strategic Housing Market Assessment 2020 identifies affordable housing need at 705 dwellings per annum (dpa), which would require 88-90% of all new housing development to be affordable, if affordable housing need was to be addressed in full at 800 dpa. As almost all housing growth in the Council's preferred spatial option is directed to Viability Zone 1 which is generally not viable, most of the new homes will be directed to a zone which cannot support the delivery affordable housing. It is the Urban Settlements within Viability Zones 3 and 4 where market and affordable housing is viable, especially on greenfield sites.	<a href="https://wirral-consult.objective.co.uk/file/5677474">https://wirral-consult.objective.co.uk/file/5677474</a>	<a href="https://wirral-consult.objective.co.uk/file/5684859">https://wirral-consult.objective.co.uk/file/5684859</a>				
1246763	LPIO-25421		The Issues & Options paper states that "A final judgement on what will be viable to require and where can only be made once the full range of likely Local Plan requirements have been agreed and assessed and will be included in the draft Local Plan, taking account of any comments submitted, based on the viability assessment to be prepared alongside the draft Local Plan." This approach is supported, subject to the presentation of evidence that states future schemes will continue to be viable. Within the Wirral, the average past annual delivery rate for affordable housing has been 175 dwellings per annum, from the period of 2004-05 to 2014-15. Despite the very high need for affordable housing identified in the Wirral SHMA and Housing Needs Study (May 2016), and there is a clear need to consider an uplift in order to correct for past under-supply As is outlined within the Planning Practice Guidance, a fundamental element of calculating the OAN for housing is considering market signals and where worsening trends are identified, adjusting planned housing figures upwards, as stated within the PPG which advises that: "An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes." X would assist Wirral Borough Council in providing evidence to support the level of development on the Site. In order to seek to deliver the overall affordable housing targets over the plan period and to allow for viability to be fully considered, we therefore consider that the overall housing need figure for the Wirral to be increased to take into account the acute need for affordable housing.						

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1248986	LPIO-25532		Support the implementation of the 30% affordability policy subject to viability. This will not, however, be supported in most urban conurbation locations. A brownfield-led approach will lead to a very low delivery rate of affordable homes and the net annual imbalance will continue to grow well above the 705 homes outlined in the Council's Strategic Housing Market Assessment (SHMA). A target of 30% would result in 240 affordable homes per annum at 800 dwellings per annum (dpa), just 34% of the 705 dpa affordable housing need identified in the 2020 SHMA. A greater housing number is needed to counteract the undersupply of affordable housing of over 700 dpa. We would expect to see a variable affordable policy dependent on the location of development in line with the viability appraisal in order to promote greater levels of affordable housing across the Borough. The maximum affordable housing percentage should be at 30%, to ensure that the right type of housing is deliverable in all locations.	<a href="https://wirral-consult.objective.co.uk/file/5662723">https://wirral-consult.objective.co.uk/file/5662723</a>	<a href="https://wirral-consult.objective.co.uk/file/5662725">https://wirral-consult.objective.co.uk/file/5662725</a>	<a href="https://wirral-consult.objective.co.uk/file/5662770">https://wirral-consult.objective.co.uk/file/5662770</a>			
1249015	LPIO-25589		Given the known affordability issues, we support the Council's preferred approach for 30% affordable housing. We are encouraged that the policy requirement will be fully tested and accommodated in the high-level viability appraisal, before being included in the Draft Local Plan. However, the current sites that are included within the proposed urban housing allocations and those which are intended to be intensified, are not viable to deliver affordable housing, which will result in a significant shortfall of affordable housing within the Borough. The Council's Strategic Housing Market Assessment 2020 identifies affordable housing need at 705 dwellings per annum (dpa), which would require 88-90% of all new housing development to be affordable, if affordable housing need was to be addressed in full at 800 dpa. As almost all housing growth in the Council's preferred spatial option is directed to Viability Zone 1 which is generally not viable, most of the new homes will be directed to a zone which cannot support the delivery affordable housing. It is the Urban Settlements within Viability Zones 3 and 4 where market and affordable housing is viable, especially on greenfield sites.	<a href="https://wirral-consult.objective.co.uk/file/5684897">https://wirral-consult.objective.co.uk/file/5684897</a>					
1246458	LPIO-25751	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246459	LPIO-25752	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1249070	LPIO-25753		Given the known affordability issues, we support the Council's preferred approach for 30% affordable housing. We are encouraged that the policy requirement will be fully tested and accommodated in the high-level viability appraisal, before being included in the Draft Local Plan. However, the current sites that are included within the proposed urban housing allocations and those which are intended to be intensified, are not viable to deliver affordable housing, which will result in a significant shortfall of affordable housing within the Borough. The Council's Strategic Housing Market Assessment 2020 identifies affordable housing need at 705 dwellings per annum (dpa), which would require 88-90% of all new housing development to be affordable, if affordable housing need was to be addressed in full at 800 dpa. As almost all housing growth in the Council's preferred spatial option is directed to Viability Zone 1 which is generally not viable, most of the new homes will be directed to a zone which cannot support the delivery affordable housing. It is the Urban Settlements within Viability Zones 3 and 4 where market and affordable housing is viable, especially on greenfield sites.	<a href="https://wirral-consult.objective.co.uk/file/5684896">https://wirral-consult.objective.co.uk/file/5684896</a>	<a href="https://wirral-consult.objective.co.uk/file/5679650">https://wirral-consult.objective.co.uk/file/5679650</a>				
1242155	LPIO-25883	yes	Yes, but wholly subject to viability. In addition it should be noted that the ability to deliver up to 30% affordable housing is likely to be increased alongside the viability of proposed sites. On this basis by identifying sites in higher value areas of the Borough the ability to deliver affordable housing targets is increased (noting land value uplift). Delivery of housing schemes in lower value areas will generally increase the challenge of viability and hence reduce the likelihood of delivering up to the 30% target.						
1249100	LPIO-25952		Given the known affordability issues, we support the Council's preferred approach for 30% affordable housing. We are encouraged that the policy requirement will be fully tested and accommodated in the high-level viability appraisal, before being included in the Draft Local Plan. However, the current sites that are included within the proposed urban housing allocations and those which are intended to be intensified, are not viable to deliver affordable housing, which will result in a significant shortfall of affordable housing within the Borough. The Council's Strategic Housing Market Assessment 2020 identifies affordable housing need at 705 dwellings per annum (dpa), which would require 88-90% of all new housing development to be affordable, if affordable housing need was to be addressed in full at 800 dpa. As almost all housing growth in the Council's preferred spatial option is directed to Viability Zone 1 which is generally not viable, most of the new homes will be directed to a zone which cannot support the delivery affordable housing. It is the Urban Settlements within Viability Zones 3 and 4 where market and affordable housing is viable, especially on greenfield sites.	<a href="https://wirral-consult.objective.co.uk/file/5677514">https://wirral-consult.objective.co.uk/file/5677514</a>	<a href="https://wirral-consult.objective.co.uk/file/5677512">https://wirral-consult.objective.co.uk/file/5677512</a>	<a href="https://wirral-consult.objective.co.uk/file/5684898">https://wirral-consult.objective.co.uk/file/5684898</a>	<a href="https://wirral-consult.objective.co.uk/file/5684949">https://wirral-consult.objective.co.uk/file/5684949</a>	<a href="https://wirral-consult.objective.co.uk/file/5677510">https://wirral-consult.objective.co.uk/file/5677510</a>	<a href="https://wirral-consult.objective.co.uk/file/5684951">https://wirral-consult.objective.co.uk/file/5684951</a>
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1249271	LPIO-26134		The Local Plan must have regard to meeting the need for specific tenures of accommodation but the sites identified will not deliver the types of homes that are needed, including affordable housing. We consider that the Council's approach completely underestimates the need for affordable housing within the Borough and the social implications of continuing to fail to meet affordable housing need. There should be a strong impetus to increase housing delivery as far as possible, alongside a robust affordable housing policy, to help tackle the current shortfall in affordable housing delivery. Affordable housing needs to be provided in areas where the need for that type of housing has been identified.	<a href="https://wirral-consult.objective.co.uk/file/5677492">https://wirral-consult.objective.co.uk/file/5677492</a>	<a href="https://wirral-consult.objective.co.uk/file/5678239">https://wirral-consult.objective.co.uk/file/5678239</a>	<a href="https://wirral-consult.objective.co.uk/file/5678247">https://wirral-consult.objective.co.uk/file/5678247</a>	<a href="https://wirral-consult.objective.co.uk/file/5684889">https://wirral-consult.objective.co.uk/file/5684889</a>	<a href="https://wirral-consult.objective.co.uk/file/5678241">https://wirral-consult.objective.co.uk/file/5678241</a>	<a href="https://wirral-consult.objective.co.uk/file/5678248">https://wirral-consult.objective.co.uk/file/5678248</a>
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1249271	LPIO-26134		The Local Plan must have regard to meeting the need for specific tenures of accommodation but the sites identified will not deliver the types of homes that are needed, including affordable housing. We consider that the Council's approach completely underestimates the need for affordable housing within the Borough and the social implications of continuing to fail to meet affordable housing need. There should be a strong impetus to increase housing delivery as far as possible, alongside a robust affordable housing policy, to help tackle the current shortfall in affordable housing delivery. Affordable housing needs to be provided in areas where the need for that type of housing has been identified.	<a href="https://wirral-consult.objective.co.uk/file/5677494">https://wirral-consult.objective.co.uk/file/5677494</a>	<a href="https://wirral-consult.objective.co.uk/file/5685010">https://wirral-consult.objective.co.uk/file/5685010</a>	<a href="https://wirral-consult.objective.co.uk/file/5678243">https://wirral-consult.objective.co.uk/file/5678243</a>	<a href="https://wirral-consult.objective.co.uk/file/5678240">https://wirral-consult.objective.co.uk/file/5678240</a>	<a href="https://wirral-consult.objective.co.uk/file/5677490">https://wirral-consult.objective.co.uk/file/5677490</a>	<a href="https://wirral-consult.objective.co.uk/file/5678246">https://wirral-consult.objective.co.uk/file/5678246</a>
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1249269	LPIO-26160		In principle, we support the Council's Preferred Approach but are concerned a total reliance on brownfield sites will minimise the opportunities to provide affordable housing, given the problems associated with bringing these sites forward. Table ES2 of the Council's 2020 SHMA demonstrates that the type and size of homes needed is different across the Settlement Areas. As such, the Council should not seek to take a blanket approach to the mix of affordable housing, which should be negotiated with the developer during the determination of the application.	<a href="https://wirral-consult.objective.co.uk/file/5675699">https://wirral-consult.objective.co.uk/file/5675699</a>					
1249263	LPIO-26185		The Local Plan must have regard to meeting the need for specific tenures of accommodation but the sites identified will not deliver the types of homes that are needed, including affordable housing. We consider that the Council's approach completely underestimates the need for affordable housing within the Borough and the social implications of continuing to fail to meet affordable housing need. There should be a strong impetus to increase housing delivery as far as possible, alongside a robust affordable housing policy, to help tackle the current shortfall in affordable housing delivery. Affordable housing needs to be provided in areas where the need for that type of housing has been identified.	<a href="https://wirral-consult.objective.co.uk/file/5684852">https://wirral-consult.objective.co.uk/file/5684852</a>					
1249782	LPIO-26432		Whilst at this stage we have not examined the detailed methodology which underpins the 30% figure, there are well known viability issues in the Wirral in what is a polarised housing market. Indeed, whilst we welcome the flexible wording in relation to subject to viability, the fact that the Wirral has a polarised housing market is of particular note when setting this strategic housing policy. In particular, we raise concerns with the ability of the proposed urban housing allocations, and those sites which are intended to be intensified, to deliver affordable housing. Due to viability issues, these brownfield sites are unlikely to be able to deliver anywhere near 30% affordable housing on site. This will result in a significant shortfall of affordable housing, not least due to the fact that the 2020 SHMA identifies an affordable housing need of 705 dwellings per annum. This would require 88% of all new housing development to be affordable if the Borough's affordable housing needs are to be addressed in full. Put simply, we again raise significant concerns in relation to the proposed housing requirement of 800 dwellings per annum, as well as the currently preferred spatial strategy to focus on urban intensification and brownfield development in the existing urban areas. The current approach will fail to deliver the amount of affordable housing that the Borough needs. To overcome this a mixture of sites located across the Borough, including viable Green Belt release sites such as Raby Hall Road, need to be allocated if affordable housing is to come forward on viable sites.	<a href="https://wirral-consult.objective.co.uk/file/5683892">https://wirral-consult.objective.co.uk/file/5683892</a>					

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1249812	LPIO-26553		Each settlement area has an imbalance of affordable dwellings; SA8 (rural areas) only has an imbalance of 31, but the other seven settlement areas have an imbalance of between 116 and 428 homes. Wirral has the highest affordable need across the whole of the Liverpool City Region with 2,585 dwellings needed to meet the need. SA6 (Hoylake and West Kirby), has a net annual need for 55 new affordable homes, assuming the methodology and calculations in the SHMA is correct. However, the predicted supply of affordable homes across the plan period in Hoylake and West Kirby is significantly less than required given that are only 4 proposed allocations in Holylake and West Kirkby of over 10 dwellings providing 92 dwellings in total. Clearly, even if all schemes delivered an affordable compliant mix, there would still be a significant shortfall in affordable need. It is noted that 36% of new affordable homes across the Wirral should be three or more bedrooms. It is a fact that a brownfield only strategy will not provide the affordable family homes that are needed, with the strategy focussed on delivering apartments. It is questioned how the general imbalance will be addressed given that the Council is proposing to allocate 113 individual sites of less than 10 dwellings whereby affordable housing cannot be sought. Combined with unviable brownfield sites failing to deliver affordable housing, the Council are simply exacerbating the lack of affordable homes rather than addressing it. Page 15 of the SHMA notes that the scale of affordable delivery will depend on three factors: government funding, housing association programmes, and viability. The Local Plan only controls one element of these three variables, that of viability. Therefore it is essential that the Local Plan allocates viable sites that will provide affordable housing.	<a href="https://wirral-consult.objective.co.uk/file/5684813">https://wirral-consult.objective.co.uk/file/5684813</a>	<a href="https://wirral-consult.objective.co.uk/file/5684811">https://wirral-consult.objective.co.uk/file/5684811</a>	<a href="https://wirral-consult.objective.co.uk/file/5684812">https://wirral-consult.objective.co.uk/file/5684812</a>			
1240932	LPIO-26621		No, we disagree with the Council's Preferred Approach. Wirral has worsening affordability issues and disproportionately high affordable housing needs and the latest SHMA recognises that there is a considerable need to deliver large proportions of affordable housing over the plan period to meet the annual net affordable need of 705 dwellings per annum in Wirral. Setting aside our concerns with the methodology assumed in the SHMA and how it has informed the content and strategy in the emerging Local Plan, we believe that based on the identified supply of housing sites, the affordable housing need will not be achieved. We consider that an alternative strategy needs to be adopted. The Council needs to identify and release sustainable and suitable Green Belt sites on land which do not suffer from the same viability issues being experienced on brownfield sites in order to meet the affordable housing needs of its residents.	<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>			
1245180	LPIO-2721	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1237944	LPIO-2768	yes							
1245058	LPIO-2779	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1238835	LPIO-2833	no	Until Council can stimulate our economy, there is little point in making 30% of all new developments affordable, because as we are well aware, there is little or no demand for them. Council needs to focus on building social housing units in the areas that need them most.						
1237546	LPIO-2867	yes	Wirral Wildlife supports at least 30% affordable homes on developments of 10 dwellings and over. These must be "zero carbon in use" not just to fight climate change, but to greatly benefit their tenants/owners by drastically reducing fuel bills.						
1245159	LPIO-2982	yes							
1245287	LPIO-3119	yes	With the proviso that this should be viewed as a minimum, and the role of Council House building be considered to enhance the provision.						
1238645	LPIO-3131	no	30% affordable homes is too weak and too especially in the proposed areas for regeneration. If private developers cannot supply affordable homes, the Council needs to build such homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than private development.						
1245311	LPIO-3240	no	Should be based on projected needs of Wirral population - age, income, size of accommodation needed, type of accommodation, plus projections regarding access to finance in future - mortgages.						
1241315	LPIO-3285	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1245416	LPIO-3376	yes							
1245346	LPIO-3435	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1238549	LPIO-361	yes	The definition of Affordable housing needs challenged and the comments of Birmingham Mayor should be understood to ensure that homes are truly affordable.						
1245462	LPIO-3655	yes							
1237827	LPIO-3796	no	Needs to be at least 50% affordable housing in all developments.						

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1245288	LPIO-3860	no	30% affordable housing is not good enough and in West Wirral the amount deemed to be affordable would be subjective. Council houses need to be built by our council.						
1245498	LPIO-3968	yes							
1240939	LPIO-4142	yes							
1245638	LPIO-4264	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1245153	LPIO-4382	yes							
1245501	LPIO-4423		There should be affordable, social and council housing in the areas that need them. These would correlate to the areas where the majority of Wirral residents are employed, as the council wishes to reduce carbon costs through unnecessary daily commuting.						
1237667	LPIO-4567	yes	Provided that it is properly enforced. Too many developers have stated an intention to provide affordable housing but have been allowed to modify their position after work has begun.						
1244720	LPIO-4640	no	Developers have wriggled out of providing "affordable Homes" in the past; see research. It should be made compulsory for developers to build for people who are not able to afford house prices. We need homes for rent. Definition of "affordable" is needed. 30% seems low. Why not make this a bigger percentage? Developers will say they are unable to provide and use loopholes to avoid loss of profit. Target figures for affordability should be watertight. Building in areas like Pensby, Thingwall and Heswall for example is a developers dream come true, as they can realise huge figures for their new builds. This is not helping those on a low income who are the ones needing help to find places to live. More well off folk have a choice of places to buy on the Wirral.						
1244629	LPIO-4758		Our borough does not need the number of houses (12,000) suggested. There is no evidence for this.						
1237873	LPIO-4861	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1245713	LPIO-5077	no							
1240590	LPIO-5100	yes	Whilst we do not dispute the need to provide sufficient levels of quality and affordable housing for younger residents and families, there nevertheless exists an ever-growing demand within Wirral for specialist accommodation for the elderly, a need clearly identified in the draft SHMA 2020. It is important to note that those schemes providing specialist elderly accommodation and falling into Use Class C2 of the Town and Country Planning (Use Classes) Order 1987 (as amended) owing to the care provided, communal facilities and occupancy restrictions, should not be required to provide affordable housing. This is because: (i) there is a critical nationwide shortage of specialist extra care accommodation across the UK which is disproportionately greater than the need for general market housing; (ii) the 'upfront' capital costs of bringing forward a C2 development are necessarily greater than for a general market housing developer; (iii) because of the extensive communal accommodation which is provided the overall cost of providing specialist accommodation of this kind is significantly greater than providing standard apartments or even specialist retirement flats. (iv) the ongoing costs and set up costs of C2 accommodation are significantly greater than other forms of accommodation; (v) nonetheless proposers of C2 accommodation are in competition with other housing developers for sites, which are ordinarily located in highly sustainable locations on brownfield land. The planning justification for the requirement for general market housing development to provide affordable housing is clear; if there is an imbalance in the housing stock and a proposal comes forward which worsens that imbalance then it ought not to be permitted unless it makes a contribution to ensure that the imbalance is not materially worsened e.g. if market housing were proposed in an area with a shortfall of affordable housing then to grant permission for an exclusively market housing scheme would worsen that imbalance and provide justification for refusal. Whereas, for specialist housing for the elderly within class C2 (such as the extra care delivered by a position specialist housing provider, different. The NPPG recognises a critical national need for such accommodation. Similarly, a significant need is identified in the area in the draft SHMA 2020. Thus, provision of such specialist housing would not perpetuate or worsen any imbalance, it would in fact diminish it.	<a href="https://wirral-co-consult.objective.co.uk/file/5656296">https://wirral-co-consult.objective.co.uk/file/5656296</a>					
1241800	LPIO-5131	no	I think the 30% "affordable" homes is not enough. If private developers find that they "cannot afford" to supply affordable homes, the Council needs to borrow to build homes too. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe.						
1245496	LPIO-5226	no	No I disagree with 30% affordable dwellings.						
1239571	LPIO-5266	yes							
1246006	LPIO-5324	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1240383	LPIO-5433	yes							
1245954	LPIO-5509	yes							

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1245073	LPIO-5637	no	The 30 % figure is unrealistically high. In many instances the developers will not be interested in building affordable houses - particularly on green belt sites where larger houses means larger profits and the price of smaller houses will still be too high to be affordable. This will inevitably lead to developers paying compensation to the council to "buy off" their liability to build affordable housing which will then get squandered on stuff like useless news letters and parking meters, and not go to fund affordable houses. 30% is unrealistically high and just a means of ensuring that these compensation payments are as high as possible. Instead the council should concentrate on focusing developers towards urban sites where affordable housing is more appropriate and provide incentives to develop these. The construction of council housing should also be considered.						
1241661	LPIO-5655	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1245984	LPIO-5734		We think that the levels of affordable housing should be higher as this is where demand is higher. Wirral has large proportions of luxury housing. Wirral Council should conduct a housing needs survey for affordable housing and focus on this area. Developers will want to build luxury housing as they get a greater profit. Households in lower income brackets have fewer cars and rely on public transport more. Focusing on housing for these groups will help reduce carbon emissions. The Council could also ask Developers for a proportional contribution towards affordable housing on sites of less than 10 dwellings of 30%, this contribution could then be used when larger sites become available (brownfield) to increase the levels of affordable housing.						
1244896	LPIO-5799	no	No. We do NOT agree with the terms of the Question. Firstly, there is no statement about the location of 'affordable' provision. This should be 'on site' in all cases without exceptional circumstances and even then should be provided by the same developer 'off site' under a 106 legal agreement covering both location, approved details and timescale, with penalties for non or underprovision. The 'viability loophole' must be closed. Secondly, we do not agree with the mix of size and tenure recommended in the flawed SHMA 2019. See separate comments including those of WGSA's Planning Consultant. During our preparations for this Consultation, we met with Registered Providers (RPs). They indicated frustration at the Council's lack of Vision, Housing Policy and Guidance on extent and location of provision which had meant that much-needed house-building had not taken place when they had considerable capacity and desire to do so. The Cabinet Lead on the Local Plan agreed this had been the situation and stated that things were underway to address this. Consequently, the RPs must be highly involved in the Regeneration Project, developing in the 'hinterland' of Wirral Waters and elsewhere in parallel with Peel's schemes at 'Wirral Waters' in order to address the quantum of need, urgency and all-round effort required to address market-resistance arising from many years of inaction and decline. ITPAS (like WGSA) agree it is important to have adequate affordable housing contributions. Wirral needs a steady stream of 'on-site' affordable housing to be delivered. A smaller unit bias is relevant to local circumstances and demographics, so we agree that at least 50% is two-bedroomed or less. See uploaded file for further comment.	<a href="https://wirral-consult.objective.co.uk/file/5677116">https://wirral-consult.objective.co.uk/file/5677116</a>					
1246310	LPIO-5943	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1245599	LPIO-6128	no	Social housing/council housing is needed which makes it affordable for people needing to be housed. Buiding on greenbelt is not affordable housing with the nature of the area.						
1242751	LPIO-617	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1238310	LPIO-6171	no	Unfortunately there is no set definition of affordable homes. Council built homes are the only real answer to providing affordable homes, reducing the housing list and helping the homeless. Successive governments and councils of all persuasions have failed to reintroduce council building programmes. Housing associations and government funded schemes are the best chance of providing housing solutions for all. Despite the statements in the viability study to the contrary the regeneration zones 1 and 2 will be the place where more affordable homes will be built. WBC must allocate more homes to these regeneration projects if they wish to increase the number of affordable home built. The good aims of this principle are rendered useless by the phrase subject to viability. This allows developers to determine if they are to provide 30% affordable homes. Developers will build expensive homes on expensive greenbelt sites undermining WBC good aspirations.						
1246161	LPIO-6241	yes							
1242541	LPIO-6323	no	An "aspiration" for 30% "affordable" homes is too weak and too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1246402	LPIO-6446	no	No there should be decent council/social housing instead.						

Person ID	ID	Question 5.2 - Do you agree with our preferred approach of seeking to achieve 30% affordable housing from all new developments of 10 dwellings or over subject to viability, based on the mix of size and tenure recommended in the Draft SHMA 2020? If not, what alternative approach would you suggest and why?	Question 5.2a - If you answered No, what alternative approach would you suggest and why? If you answered Yes, you can comment here.	Attachment 1	Attachment 2	Attachment 3	Attachment 4	Attachment 5	Attachment 6
1246425	LPIO-6549	yes	Consistent with national policy, we agree that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments (67-008-20190722). Eastham contains sites (including SP050 West of Rivacre Road (parcel 4.14)) that are demonstrated to be viable for meeting different types of housing across the Borough.	<a href="https://wirral-consult.objective.co.uk/file/5669692">https://wirral-consult.objective.co.uk/file/5669692</a>					
1241723	LPIO-6568	no	An "aspiration" for 30% "affordable" homes is far too weak and far too low. If private developers "cannot afford" to supply affordable homes, the Council needs to borrow to build these homes. There are good examples in the country, such as Goldsmith Street in Norwich, and the planned Parc Hadau in Pontardawe. Providing publicly-owned housing will address affordability far more effectively than loosely worded "affordability" targets which developers can easily avoid.						
1245086	LPIO-6619 1 of 3	yes	There should definitely be a substantial allocation in the plan for affordable housing. However, I have no idea what the percentage should be. 1. The Wirral Local Plan 'Empty Homes' Reports (Jan 2020) are considered to be flawed in significant ways and in the conclusions. 2. Having praised Wirral's regime for delivery of 'Empty Homes' back into use in all critical aspects, it concludes that the contribution to the Housing Supply should be meagre when compared with Wirral's insistent past delivery. 3. There is a lack of confidence and ambition shown, with a minimising of potential which is unjustified. The findings should have led to a commitment to expand the programme. 4. The current situation is given in the 'Key Findings' of the Task 1 Report: 1.2 Key Findings 1.2.1 Wirral Council have a proactive approach to addressing the number of empty homes within the Borough. Initiatives currently include Long Term Empty Homes Premium, empty property grants and appropriate assistance to support property owners via various schemes outlined in their corporate Housing Strategy. These initiatives have achieved a continued and sustained decrease in empty home numbers, with over 250[1] homes brought back into active use each year through the Council's intervention. 1.2.2 There is support within previous consultations to focus on bringing empty homes back into use and including them within the Council's housing supply or within their windfall allowance. 5. That Report goes on to say in the 'Introduction': "2.1.1 - Empty homes are an important and complicated issue both nationally and locally in Wirral. The overall number of empty homes within Wirral in 2018 was 4,955 dwellings with an overall sustained decrease in the number of empty homes since 2004.						
1245086	LPIO-6619 2 of 3	yes	2.1.2 - To achieve this sustained decrease, the Council have a proactive and positive approach to managing empty homes which includes: • Long Term Empty Homes Premium through Council Tax; • The Wirral Council Developers List; • Financial assistance with empty property grants; • Enforcement; • Enforced sale; • A range of support and advice measures and linkages with housing options; • Property accreditation; and • Overall strategic aim through the Wirral Housing Strategy." 6. This is more than good, it is exemplary as a 'model' set-up. Enviably consistent delivery includes a steady overall reduction in the number of 'Empty Homes' and great consistency of numbers delivered, as shown: Numbers of empties brought back into use p.a. 2010/11 - 270 2011/12 - 294 012/13 - 296 2013/14 - 300 2014/15 - 302 2015/16 - 280 2016/17 - 308 2017/18 - 290 2018 - 280 Average number of properties brought back into use each year during the period is 291.						
1245086	LPIO-6619 3 of 3	yes	7. A case could be made for either 'sustained delivery' or 'increased delivery' by showing continued support and possibly an increased commitment within the existing Policy. Instead, the Council has meekly agreed to an average figure of just 90 pa. This is a disgrace and throws away a potential Supply capacity of over 2,000 homes over the Period. The excuse is concern that the Inspector may rule 'Empty Homes' out entirely. 8. That dismal outcome is considered unlikely having regard to the history of Inspectors' decisions when faced with such a good, consistent delivery, a Policy in place, commitment by the Council and a large supply of 'Empty Homes'. In such circumstances, surely having a 'sustained delivery' or 'increased delivery' within the Local Plan would more likely see the outcome as one of: ? 'increased delivery' accepted or subject to 'main modification' ? 'sustained delivery' accepted or subject to 'main modification', or ? 'sustained delivery' less, say, 25% for caution as subject to 'main modification'. 9. Four Case Studies are included. All are unsuitable for the drawing of parallels. 9.1. Royal Borough of Kensington & Chelsea. A London council is hardly comparable, especially one with low delivery and negative delivery for 3 of the last 10 years when Wirral has had a consistent delivery more than six times as many. 9.2. Barrow in Furness. A council with NO 'Empty Homes' Strategy or Policy unlike Wirral. Despite this, the Inspector insisted an allowance be added through 'Main Modification'. This should give confidence. 9.3. East Lindsey Council. A council with a small population and a tiny delivery. 9.4. Birmingham City Council. A very dissimilar council with a population 3.5 times the size of Wirral but with a much less successful delivery record. 10. As Case Studies, they are not suited to Wirral's case, except in as much as they should give the Council great confidence, ambition and resolve - sadly absent. The hope is that at Regulation 19, the Council will believe in themselves and include a much higher figure. 11. Including a higher figure would suit the Council's stated Aim of delivering the homes needed without any release of Green Belt land. Delivery over last 9 years has been between 270 and 308, averaging 291 per annum						

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1246445	LPIO-6748	yes							
1237647	LPIO-684	yes							
1246482	LPIO-7039	yes	No, I would like to see more than 30% affordable dwellings. We need more council housing in the areas that need them. However, I disagree with the housing numbers.						
1246488	LPIO-7200	no	No, I disagree with 30% affordable dwellings, there should be social housing/council housing in the areas that need them. However, I disagree with the housing numbers.						
1246348	LPIO-7225	no	Affordable houses should be built as and when they are required.						
1246553	LPIO-7454	no	We need Council Houses not "affordable" housing. Why is there no provision for any Council Housing? If 30% are affordable, that means that 70% is unaffordable. Wirral is working class area and should have good sized and quality Council Housing.						
1246551	LPIO-7488	no	In response to Q5.2 Local Plan policy should make provision for cases where developers wish to exceed targets for affordable housing with 100% and this approach should be reflected in the re-allocation of the particular site located at Paulsfield Drive Woodland for residential development.						
1240932	LPIO-7618	no	No, Our Client disagrees with the Council's Preferred Approach. Wirral has worsening affordability issues and disproportionately high affordable housing needs and the latest SHMA recognises that there is a considerable need to deliver large proportions of affordable housing over the plan period to meet the annual net affordable need of 705 dwellings per annum. Setting aside our concerns with the methodology assumed in the SHMA and how it has informed the content and strategy in the emerging Local Plan, we believe that based on the identified supply of housing sites, the affordable housing need will not be achieved. The Consultant's independent analysis confirms that the percentage of affordable homes being delivered on sites currently in Wirral is considerably less than the aspiration set out in the emerging Local Plan. Furthermore, the number of sites offering no onsite affordable housing or reduced provisions for affordable units indicate that there are significant viability issues associated with the incorporation of affordable units on brownfield sites in Wirral. This is also supported by the conclusions of the Consultant's Viability Assessment for Wirral. Our Client considers that an alternative strategy needs to be adopted. The Council needs to identify and release sustainable and suitable Green Belt sites on our Clients land which do not suffer from the same viability issues being experienced on brownfield sites in order to meet the affordable housing needs of its residents. Our Client Vision provides for the delivery of high quality affordable housing within healthy, sustainable communities and sets out an appropriate way to meet the affordable housing needs of Wirral. This solution should be taken forward in the next iteration of the Plan. Further detail on our response to this question can be found in Stage 4 of the Consultant's Technical Assessment and our suggested alternative approach in the Vision Document.		<a href="https://wirral-consult.objective.co.uk/file/5683689">https://wirral-consult.objective.co.uk/file/5683689</a>	<a href="https://wirral-consult.objective.co.uk/file/5682697">https://wirral-consult.objective.co.uk/file/5682697</a>	<a href="https://wirral-consult.objective.co.uk/file/5682701">https://wirral-consult.objective.co.uk/file/5682701</a>		
1246592	LPIO-7753	no	The percentage of affordable homes should be higher, emphasis should be on creating more social housing						
1243342	LPIO-782	yes							
1246594	LPIO-7830	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers.						
1246591	LPIO-7916	yes	See previous comment - the "subject to viability" caveat means that the target will not be met - WMBC will be played by the developers unless it is robust.						
1240903	LPIO-7928	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers. Wirral simply do not need this amount of housing.						
1246605	LPIO-8157	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. However, I disagree with the housing numbers						
1240653	LPIO-8190	yes							
1241770	LPIO-8196	yes							
1245607	LPIO-8213	no	I consider that the 30% target is excessive and will deter developers. Something closer to 15% would be acceptable. I am not clear how the Council have arrived at the 30% target.						
1246612	LPIO-8349	no	I agree that we need a lot of social housing, and will certainly need it if we can develop Birkenhead as planned. Building social housing in areas where it is not needed is not useful. Builders, who are only in it for the money, are not likely to build any social housing at all if allowed to build in areas like Caldly. They might say that they will, but history says, they won't!!!						
1237882	LPIO-8387	no	No, I disagree with 30% affordable dwellings, there should be social housing / council housing in the areas that need them. The plan should accommodate the need for specific housing to meet an ageing populations need and also plan for housing that meets the requirements of first time buyers. These needs may be concentrated in various areas within Wirral and should not be blanket figures in all areas. A more flexible plan is needed to ensure that is accommodates changes in lifestyle and needs. I also disagree with the housing numbers.						

